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SITE COMPATIBILITY CERTIFICATE APPLICATION 124-142 Beamish Street and 16-18 Ninth Avenue, CAMPSIE, NSW, 2194



Pacific Community Housing[®]

PROMOTING AND PROVIDING ACCESS TO SAFE
AND SECURE AFFORDABLE HOUSING

Submitted to Department of Planning
Industry and Environment
August 2022

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Appendix C	Second Concept Design Report (Urbanlink)
Appendix D	Campsie Town Centre Feasibility Assessment
Appendix E	Heritage Impact Statement
Appendix F	Traffic & Parking Assessment
Appendix G	Preliminary Site Investigation
Appendix H	Hazardous Materials Assessment
Appendix I	Confirmation of Community Housing Provider
Appendix J	Authority to Lodge

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1. Introduction

1.1 Overview

This Report has been prepared by Pacific Planning on behalf of Pacific Community Housing to accompany an application to the NSW Department of Planning and Environment (DPE) for a Site Compatibility Certificate (SCC) under Division 5 of Part 2 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP). The application relates to land located at 124-142 Beamish Street and 16-18 Ninth Avenue, Campsie.

The SCC supports the development of the site which will facilitate 320 dwellings, of which at least 50% (160 dwellings) will be designated affordable housing units, managed by Pacific Community Housing, a registered and accredited housing provider, for a period of 15 years in accordance with the provisions of Clause 40 of the Housing SEPP.

The subject site is zoned B2 Local Centre within which development for the purpose of a '*residential flat building*' is prohibited. The site is approximately 150 metres from the entrance to Campsie railway station and is therefore within the 800 metres designated by Clause 36 of the Housing SEPP. Therefore, as per Section 36(1)(a) the provisions of Division 5 of Part 2 of the Housing SEPP apply.

A meeting with the Department of Planning, Industry and Environment (DPIE) was held on Monday, 25 July 2022, where the site was identified and the development proposal presented, having regard to the compatibility of the site with its surroundings, and assessment pathways under the provisions for built-to-rent housing under the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP). A Scoping request for the Secretary's Environmental Assessment Requirements (SEARs) was lodged on 16 August 2022.

At the meeting, the following key items were also discussed:

- Compatibility with Council's draft Master Plan for Campsie and Council's intention to rezone the site to B4 Mixed Use, also noting the existing surrounding uses and future anticipated uses associated with the zone, densities and heights.
- Viability studies for previous proposed schemes for the site, showing Council's 20-storey and 6.2:1 FSR will not be viable for a fully commercial development on the site, and provides no increase in density than is currently permitted on the site.
- The prime location of the site, within the Campsie Town Centre.
- The unique opportunity to revitalise the centre that this proposal presents, given that the site is the largest and most strategically located landholding within Campsie Town Centre.

This report describes the site, its context and existing environment. It also outlines the proposal, the project justification and provides an environmental assessment of the concept facilitated by the SCC against the provisions of the Housing SEPP and relevant matters for consideration, including relevant legislation, environmental planning instruments, planning policies and strategies.

The SCC application is supported and should be read in conjunction with the following reports and documentation:

Appendix	Report	Author
Appendix A	Site Plan	Turner
Appendix B	First Concept Urban Design Report	Turner
Appendix C	Second Concept Urban Design Report	Urban Link Architects
Appendix D	Campsie Town Centre Feasibility Assessment	Urbis
Appendix E	Heritage Impact Assessment	Urbis
Appendix F	Traffic and Parking Assessment	Varga Traffic Planning
Appendix G	Preliminary Site Investigation	Benviron Group
Appendix H	Hazardous Materials Assessment	Benviron Group
Appendix I	Confirmation of Community Housing Provider	Pacific Community Housing
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Table 1: List of SCC supporting documentation

1.2 Housing SEPP

The Housing SEPP was introduced on 26 November 2021, to deliver housing to meet the needs of the whole community, by providing for more affordable homes, more choice of homes and creating new types of homes to meet these changing needs. The new SEPP will incentivise the supply of affordable and diverse housing in the right places and for every stage of life and help support the economic recovery of the home building sector in NSW following the COVID-19 pandemic.

Throughout NSW there is a strong need for a range of affordable housing options amongst the community, and it is well recognised that government at all levels, private industry and the non-government sector must work in partnership towards finding innovative ways to provide more affordable housing. The Affordable Housing SEPP is a policy mechanism to facilitate this co-operation.

As stated above, the Housing SEPP applies to the subject land. Clause 36 *Land to which Division applies*, states:

This Division applies to the following land—

(a) *land in the Greater Sydney region within 800m of—*

- (i) *a public entrance to a railway station or light rail station, or*
- (ii) *for a light rail station with no entrance—a platform of the light rail station,*

(b) *land in the following towns within 400m of land in Zone B3 Commercial Core or Zone B4 Mixed Use, or an equivalent land use zone—*

Albury, Ballina, Batemans Bay, Bathurst, Bega, Bowral, Cessnock, Charlestown, Coffs Harbour, Dapto, Dubbo, Glendale–Cardiff, Gosford, Goulburn, Grafton, Lismore, Maitland, Morisset, Newcastle, Nowra, Orange, Port

Macquarie, Queanbeyan, Raymond Terrace, Shellharbour, Tamworth, Taree, Tuggerah–Wyong, Tweed Heads, Wagga Wagga, Warrawong, Wollongong.

Therefore, the SEPP applies as follows:

- the land is within the 800-metre requirement of Campsie train station (see Figure 1 below); and
- is zoned B2 Local Centre under the Canterbury LEP 2012 under which ‘residential flat buildings’ are prohibited.



Figure 1: Distance from train station – approx. 150 metres

Further, in accordance with the requirements of the SEPP, this report will demonstrate:

- Compatibility with surrounding land uses.
- Acceptable impact, in respect to bulk and scale, on existing and approved uses.
- Sufficient services and infrastructure to meet the demands arising from the development.
- That the development concerned will not have an adverse effect on the environment.

2. Site Description and Context

2.1 Site Description

The land to which this SCC application applies is located at 124-142 Beamish Street and 16-18 Ninth Avenue, Campsie. The site is located to the north of the Campsie train station, which is approximately 150 metres from the entrance to the station on Beamish Street, which is south of North Parade.

The site has a frontage of 85 metres to Beamish Street and Ninth Street, adjoining the local centre. The land the subject of this SCC application is identified in Figure 2. It is noted that development on the site has recently been demolished and the site is now vacant in anticipation of development and urban renewal.

The subject site comprises one lot and is known legally as follows:

Address	Lot details	Area
124-128 Beamish Street	Lot 101 DP 739066	3,845sq.m
132 Beamish Street	Lot 1 DP 575837	
134-138 Beamish Street	Lot 2 Section A DP 4190	
142 Beamish Street	Lot 1 Section A DP 4190	
16 Ninth Avenue	Lot 2 DP 176308	
18 Ninth Avenue	Lot 1 DP 176308	

Table 2: Site details



Figure 2: Aerial view of the subject site (prior to demolition)

As mentioned above the site has recently been cleared with existing development demolished in anticipation of future development and the urban renewal of the Campsie town centre.

The images below provide context of surrounding development to the site and the current status of development on the site.



Image 1: Beamish Street looking south



Image 2: Subject site looking towards Beamish Street and the Orion Theatre



Image 3: Adjoining 7 storey residential apartment development to the west (17-21 Campsie Street)



Image 4: Nearby existing town centre development

2.2 Site Context

The site is currently zoned B2 Local Centre under the Canterbury Local Environmental Plan 2012. Division 5 of Part 2 of the Housing SEPP applies as '*residential flat buildings*' are prohibited in the B2 Local Centre zone under the Canterbury LEP 2012.



Figure 4: Zoning Map under Canterbury LEP 2012

The site is within the Campsie Town Centre, which is a mixed use urban environment. The whole of the Campsie Town Centre is zoned B2 Local Centre. There is some residential flat development. Much of the area is currently underdeveloped to its capability to support the role of the Campsie town centre. The location of the subject site is ideally located within the context of the town centre, already adjoining four storey residential apartment development, and multi-dwelling housing.

2.3 Existing Environment

The site was occupied by a 2-storey dwelling with double garage and paved driveway, which has now been demolished. While the site is generally cleared, there is a large garden to the rear of the site containing trees being a combination of remnant endemic specimens and planted specimens of exotic species.

None of the trees on the site are listed within the Councils Significant Tree Register or are endangered species, however nine trees are part of an indigenous plant community.

The site has a diagonal cross fall from the southeast corner of the site to the north west corner (Rosebery Street) of 2.24 metres. The site falls 1.11 metres along Rosebery Street to the north and 0.93 metres along rear boundary to the north.

The site is in an urban context and there are no known hazards or other natural constraints to the site.

3 Description of the Proposal

This report provides a detailed description of the development proposal in support of the application for a SCC that will facilitate 320 dwellings, of which a minimum of 50% (160 dwellings) of the accommodation will be used for the purpose of affordable housing.

3.1 Development Overview

An overview of the development proposal is included in Table 3 below:

Address	124-142 Beamish Street and 16-18 Ninth Avenue, Campsie
Site Description	Lot 101 DP 739066 Lot 1 DP 575837 Lot 2 Section A DP 4190 Lot 1 Section A DP 4190 Lot 2 DP 176308 Lot 1 DP 176308
Area	3,845sq.m
Community Housing Provider	Pacific Community Housing
LGA	Canterbury-Bankstown
Zoning	B2 Local Centre
Permissibility	The site is zoned B2 Local Centre under the Canterbury LEP 2012. 'Residential accommodation' is prohibited in the B2 Local Centre zone. Therefore, Division 5 of Part 2 of the Housing SEPP 2021 applies.
Development Description	This application seeks a SCC to facilitate the progression of a concept for redevelopment of the site, including approximately 320 apartments. The concept is subject to a major project application with the Department of Planning and Environment which will be subject to a design process through the State Design Review Panel, which will refine the scheme and its dwelling yield.

Table 3: Proposal Overview

3.2 Development Background

The 'Supporting Economic Recovery in NSW' report, released on 14 May 2020 to help the state recover from the COVID-19 pandemic argues the most immediate challenges are rapidly rising unemployment, the widespread failure of small and medium enterprises, falling incomes and wealth, and rising inequality and disadvantage. The ideal policy response would simultaneously address these issues, with greater investment in social and affordable housing presenting a possible solution, the report states.

"This is a prime opportunity for the NSW government to work with the community housing sector and the construction industry to invest in social and affordable housing, and support jobs, SMEs and NSW's vulnerable citizens", NCOSS chief executive Joanna Quilty is quoted as saying when the report was released. The Equity Economics modelling was commissioned by the NSW Council of Social Service, Homelessness NSW, Shelter NSW, the Community Housing Industry Association and the Tenants' Union of NSW.

As noted in the revised draft Campsie Town Centre Master Plan, *"CBCity's Housing Strategy has identified a need for 5,600 new homes in the Campsie Town Centre with approximately 760 new homes within the node between Canterbury Road and Beamish Street."* Furthermore, *"It is necessary to increase the capacity of our planning controls in Campsie. Current controls do not have capacity to accommodate targeted dwelling and population growth to 2036."*

The Master Plan has an action to *"Introduce an Affordable Housing Contributions Scheme in the Local Environmental Plan as part of achieving an incentive height and floor space ratio, requiring new developments to provide 3% of total dwellings as affordable dwellings, or a monetary contribution of \$198 per square metre* of total residential gross floor area to be dedicated to the development of affordable housing. Developments providing on-site infrastructure and/or substantial proportions of floor space for employment generating floor space will be exempt from the provision of affordable housing."* (Action 9.2.1)

However, provided the allowable FSR makes development economically viable and sustainable, this proposal has the capacity to provide at least 160 affordable apartments as part of a built-to-rent scheme on this site without the need to invoke a contributions scheme. In the context of the findings of the Urbis report mentioned under heading 3.6, it is anticipated that a contributions scheme (if applied) would fail to meet the economic sustainability requirements of the Act or the relevant Ministerial direction unless significant higher densities are applied to the precinct and this site. Higher yields drive lower per unit delivery costs to projects to enable the viable supply of new affordable rental housing without significant unintended economic impacts of lower supply and higher housing costs in the medium to long run.

As shown in Table 4, 52.8% of occupied private dwellings are rented in Campsie. This is over 20 percentage points higher than in NSW as a whole. Only 20.3 per cent own their home outright, while 23.3 per cent own with a mortgage; for owned and mortgaged, this is 20.5 percentage points lower than NSW as a whole. This makes renting and rental affordability a pressing concern among the residents of Campsie.

Tenure type	Campsie (no.)	% Campsie (%)	NSW (%)
Owned outright	1,843	20.3	31.5
Owned with a mortgage (a)	2,099	23.2	32.5
Rented (b)	4,783	52.8	32.6
Other tenure type (c)	133	1.5	1.9
Tenure type not stated	201	2.2	1.5

Table 4: Tenure Type, Campsie* (Source: ABC Census 2021)

* Occupied private dwellings (excl. visitor only and other non-classifiable households)

In June 2022, SQM Research recorded the lowest rental vacancy rate for Campsie since November 2017. The rental vacancy rate for Campsie was 1.5 per cent in June 2022. A vacancy rate of 3% is considered healthy because it represents a market balanced between tenants and owners. Areas with vacancy rates of less than 2% mean low supply relative to demand, while vacancy rates above 4% mean that there is more housing supply than demand.

As shown in Table 5, the vacancy rate has dropped to 1.5% (in June 2022). Falling vacancy is placing upward pressure on rents which have risen by \$78 per week between January and August, a rise of 21.7%. Since March 2022, rents have risen by at least 2% every month; between May and June rents rose by 5.3%.

There were only 91 properties available for rent in Campsie in June 2022, suggesting that the rental market is extremely tight and that providing more affordable housing in the area is a very pressing serious social concern.

	Rent (\$)	Change MoM (%)	Change YoY (%)	Vacancies (no.)	Vacancy Rate (%)
Aug-19	419			164	3.0
Sep-19	427	1.9%		142	2.6
Oct-19	414	-3.0%		197	3.5
Nov-19	415	0.2%		207	3.7
Dec-19	424	2.2%		240	4.3
Jan-20	430	1.4%		225	4.0
Feb-20	435	1.2%		208	3.7
Mar-20	429	-1.4%		230	4.1
Apr-20	421	-1.9%		267	4.7
May-20	402	-4.5%		262	4.6
Jun-20	400	-0.5%		264	4.6
Jul-20	394	-1.5%		281	4.9
Aug-20	388	-1.5%	-7.4%	236	4.1
Sep-20	393	1.3%	-8.0%	264	4.6
Oct-20	399	1.5%	-3.6%	265	4.6
Nov-20	393	-1.5%	-5.3%	289	5.0
Dec-20	381	-3.1%	-10.1%	338	5.8
Jan-21	380	-0.3%	-11.6%	311	5.3
Feb-21	375	-1.3%	-13.8%	316	5.4
Mar-21	366	-2.4%	-14.7%	322	5.5
Apr-21	375	2.5%	-10.9%	319	5.4
May-21	358	-4.5%	-10.9%	282	4.8
Jun-21	360	0.6%	-10.0%	280	4.7
Jul-21	369	2.5%	-6.3%	263	4.4
Aug-21	372	0.8%	-4.1%	282	4.7
Sep-21	379	1.9%	-3.6%	270	4.5
Oct-21	377	-0.5%	-5.5%	268	4.4
Nov-21	376	-0.3%	-4.3%	278	4.6
Dec-21	363	-3.5%	-4.7%	284	4.7
Jan-22	360	-0.8%	-5.3%	241	4.0
Feb-22	365	1.4%	-2.7%	205	3.4
Mar-22	373	2.2%	1.9%	162	2.6
Apr-22	384	2.9%	2.4%	134	2.2
May-22	393	2.3%	9.8%	103	1.7
Jun-22	414	5.3%	15.0%	91	1.5
Jul-22	426	2.9%	15.4%		
Aug-22	438	2.8%	17.7%		
Since Jan 2022	78	21.7%		-150	-2.599

Table 5: Rent, Change in Rent, Vacancies and Vacancies Rates, All Units, Campsie (Source: SQM Research, Postcode 2194, Week Ending 5 August 2022, PPM Economics and Strategy)

3.2.1 Development Overview

Future development proposes the construction of a dual tower apartment development with 320 units and commercial/retail space. A concept has been established, although this will be developed as part of the State Significant Development (SSD) process, for which a separate application has been lodged. The proposed schemes for the site have been prepared by Turner Architects at Appendix B and UrbanLink at Appendix C.

The proposed development outcome for the site follows the key design principles established for the future development of the site having regard to its context and strategic location, the need for affordable housing in the Canterbury-Bankstown LGA, and the compatibility of future development with the existing and preferred future development surrounding the site. The key design principles include:

- A building height that is compatible with surrounding proposed and preferred future heights under the draft Campsie Master Plan;
- To maximise the amenity of apartments with generous northern exposure;
- Provide an appropriate interface to Beamish Street that contributes to the streetscape; and
- Consider built form and orientation in the context of the site location, including northern exposure and potential future development.

The development facilitated by this SCC application has been designed in accordance with the design principles of SEPP 65 and demonstrates compatibility within its context. In particular, the proposed development seeks to achieve the following outcomes for the site:

- A maximum height of 25 storeys, with two towers (plus rooftop open space and servicing), with a 2-8 storey podium. While the Housing SEPP prevails where there may be an inconsistency with the principal development controls within an LEP, it is important in demonstrating compatibility with existing and future development in the surrounding area to respond to the local context.
- To incorporate a design that complements a mixed residential setting and its location to the Campsie town centre and railway station.
- To maximise articulation and solar access by incorporating deep recesses within the massing form to amplify the sun and animate the facades. The building layout is planned to capture sunlight into apartments and communal open spaces throughout the day, all year round.
- To maximise the amount of landscaping and communal open space, to be accessible to residents and planted with flowering trees, lush planting with a mix of colour and texture and low-level planting with trailing plants along the edges of planters

3.2.2 Meeting with Department of Planning, Industry and Environment

A meeting with the Department of Planning and Environment (DPE) was held on Monday, 25 July 2022, where the site was identified and the development proposal presented, having regard to the compatibility of the site with its surroundings.

The following provides a summary of matters discussed at that meeting:

- Currently zoned B2 Local Centre with a 21 metre height limit.
- The site does not have a density control.
- The site is 150 metres from Campsie railway station.

- The site has been identified in the Campsie Master Plan (draft) as suitable for intensification.
- Council's intention is to rezone the site to B4 Mixed Use.
- The Campsie Master Plan includes a new height restriction for the site of up to 20 storeys.
- It also includes a proposal to introduce a Floor Space Ratio (FSR) restriction of 4.1-6.2:1.
- Previous analysis suggests that 20 storeys does not provide a Gross Floor Area that would be viable.
- The proposed controls do not facilitate the redevelopment of the site.
- Council's proposed strategy would only allow for what can currently be achieved under current land use controls at a height limit of 21 metres – despite the increase in allowable height, there would be no increase in density under the FSR controls.
- Studies have modelled an 8-9.5:1 outcome, which work well from an urban design outcome and likely (to be tested) economic sustainability outcome.
- The project proposes a 25-level built form at a density and form that would support the viable redevelopment of the site as Build to Rent and Affordable Housing.
- We will seek the statutory outcome via the application of an SCC on the land as the planning process now and have a continuing SSD process to deliver.
- The site occupies a prime location within the Campsie Town Centre, within easy walking distance to shops, services and transport.
- This site is the largest and most strategically located landholding within Campsie Town Centre. Accordingly, the proposal presents a unique opportunity to revitalise the centre.

3.3 Development and Design Principles

3.3.1 Built Form and Scale

The building form will be developed in collaboration with the Department of Planning and Environment, the Government Architect and other stakeholders. The development will be designed to fit within the context of Beamish Street and the Campsie Town Centre.

An earlier scheme had the following attributes, however the design will evolve:

- 2 x 25 storey (plus rooftop open space and servicing)
- 2-8 storey podium
- FSR – 8.03:1
- Total GFA – 30,777
- Residential GFA – 26,032sq.m
- Commercial GFA – 4,745sq.m
- Units – 320

The earlier scheme had a built form massing shown in Figure 5, with the later massing illustrated in Figure 6.



Figure 5: Indicative built form massing (source: Turners Scheme)



Figure 6: Indicative built form massing (source: Urbanlink)

3.3.2 Apartment Size and Layout

The apartment size and layout will be determined by the final built form. However, they will be suited to older people, people with a disability, essential key workers and first home buyers. There is also the potential to include dual-key apartments to further diversify the apartment types. Apartments will vary in size, with the smallest being from approximately 51sq.m and the largest being 104sq.m.

20% of apartments will be designed to achieve 'silver level' Liveable Housing Guideline's universal design features.

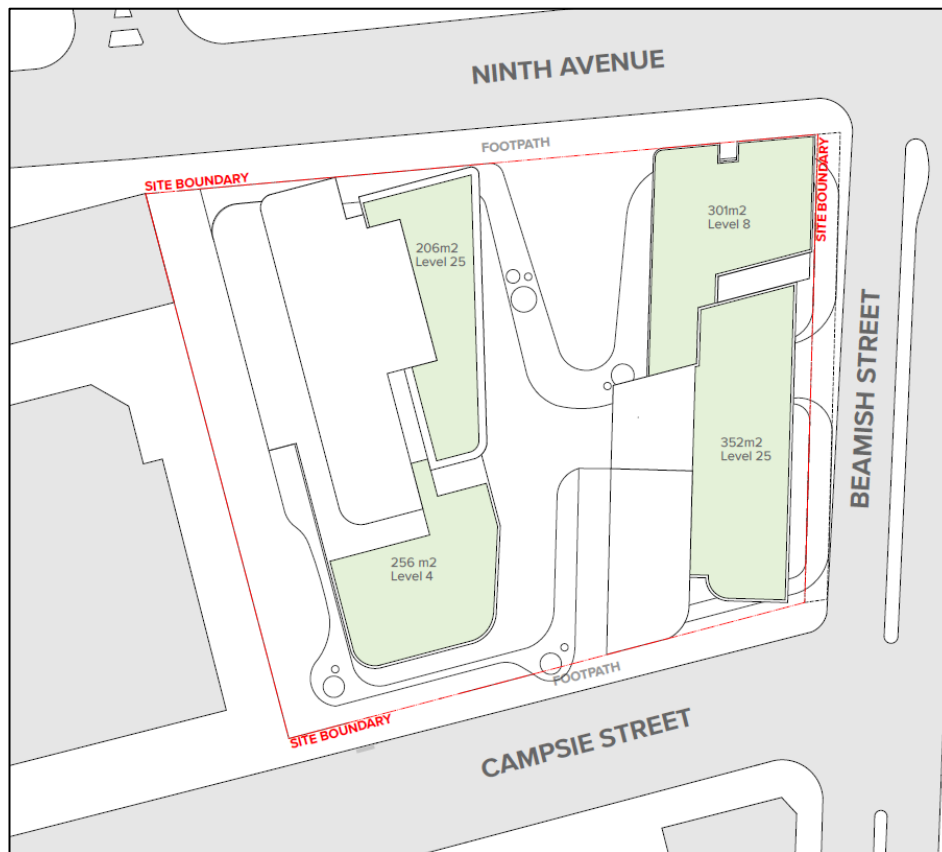
3.3.3 Landscape and Common Areas

The site is an iconic one within the Campsie Town Centre. The built form will be designed to ensure that it is in keeping with the site, its surrounding area and the nearby heritage sites.

The design recognises the importance of the landscape and integrates this into the via several communal open spaces over podium, and the publicly accessible plaza and through-sitelinks, to increase amenity for residents as well as visitors to the site.

The building alignment for the residential buildings over podium will allow for passive surveillance of the communal open spaces while the active retail ground will encourage greater use of the ground level plazas and landscaped spaces.

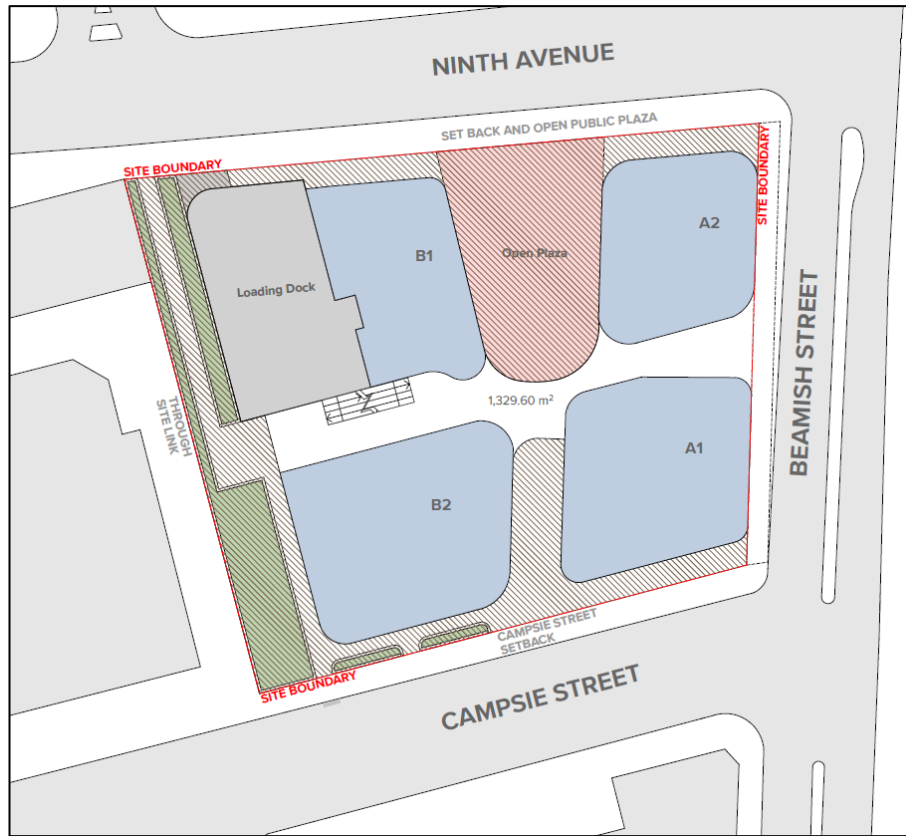
The through-site-link provides for 200sqm of deep soil planting



LEGEND

- - - - - Boundary
- Communal Private Open Space Area
1115 m² 28 % of Site Area.

Figure 7: Communal Open Space diagram



LEGEND

- - - Boundary
- Public Accessible Open Space 1329.6 m²
- Open Plaza Area Takes up 445m² of 1329.6 m² Total Area of Public Accessible Open Space

Figure 8: Publicly accessible open space

3.3.4 Access and Vehicles

While parking is not required under Clause 38(4) of the Housing SEPP, given its proximity to public transport, car parking spaces will be provided across five basement levels.

Vehicular and service access has been diverted away from Beamish Street, utilising Ninth Avenue to minimise any direct conflicts between vehicular traffic and pedestrian access.

Service vehicles, loading dock and the basement carpark ramp off Ninth Avenue are located away from the public plaza.

The accompanying Traffic Report provides further details on the proposal and analysis the effects of the proposed development and the resulting trip generations on to the surrounding street network.

Five levels of basement carparking provides 355 carparking spaces for visitor, retail patron, worker and the residents on site, providing relief to the on-street parking.

3.3.5 *Amenity*

The development will be designed to provide excellent amenity to all residents:

- The scheme provides opportunity for natural cross ventilation of buildings and increase sunlight access to units.
- From the overall 320 apartments, 235 or 73.4% receive 2 hours of sun during winter and 68.6% are naturally cross ventilated.
- Separation of the buildings over podium will allow better solar access for a significant period of the day while the open connections to the surrounding streets promotes natural cross ventilation of the space.
- The crafting of the plaza's roofscape will provide for natural light to the centre of the internal plaza by peeling back solid parts of the roof.
- Weather protection is provided by awnings adjacent to the tenancies.

3.3.6 *Crime Prevention*

- The proposed concept plan retains active interface on all streets to allow for greater passive surveillance. The public plaza is engaged and connected to the surrounding streets and forms part of the precinct-wide network of pedestrian connections.
- The proposal is also consistent with Crime Prevention Through Environmental Design (CPTED) and optimises the safety of the public domain.

3.3.7 *Infrastructure and Services*

The site is part of a long established residential and business urban area, which is well served by all urban services and infrastructure. The site is well serviced by utilities infrastructure required to support residential land uses in accordance with the Housing SEPP.

Notwithstanding, utilities, infrastructure and services will be addressed, and relevant utility providers consulted as part of future development applications for the site to support the provision of gas, water, sewer and electricity.

4 Statutory Context

4.1 Environmental Planning & Assessment Act 1979

The proposal is consistent with the objects of the Environmental Planning & Assessment (EP&A Act) 1979 as it is considered to promote the orderly and economic use and development of land without resulting in an adverse impact on the environment while promoting the delivery and maintenance of affordable rental housing.

Relevant objectives under Section 1.3 Objects of the Act of the EP&A Act 1979 include:

- (d) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,*
- (c) to promote the orderly and economic use and development of land,*
- (d) to promote the delivery and maintenance of affordable housing,*
- (g) to promote good design and amenity of the built environment,*

The development is consistent with the above objectives as follows:

- The application for a SCC will facilitate the orderly and economic development of a site and the Campsie town centre, which contains major rail infrastructure.
 - The development is orderly in that it is generally compliant with the proposed future maximum building height in the Draft Campsie Master Plan.
 - The draft height limit of 20 storeys is a reflection of the preferred future heights within the site context and future development outcomes within the surrounding area, and given the proximity to major public transport infrastructure the proposed development will contribute to meeting the needs of the community within a high density environment.
 - The development will be designed to ensure that it is economic in that the site is within the Campsie town centre and is within short walking distance of the Campsie train station. Given the connectivity of the site to the region and the Sydney CBD, the site could be considered underutilised in its ability to support a social and community need for affordable housing without the need for private transport use.
 - At the scale and yield proposed future development can provide additional affordable housing supply to meet the social needs of the community.
 - The development proposition seeks the orderly and efficient use of land to assist the housing needs of those in need. The proposal is aimed to be sustainable through an appropriate balance of social, economic and ecological considerations.
- The Development will directly achieve the objectives of Section 1.3 of the EP&A Act 1979 to promote the delivery and maintenance of affordable rental housing. It does this by facilitating the development of 320 dwellings, of which a minimum of 160 will be affordable homes in accordance with the Housing SEPP 2021 in an area of Sydney with increasingly significant housing stress;

- The design, layout and bulk of future development facilitated by this application will be advanced with particular attention to the following:
 - Compatible height with existing and future development surrounding the site;
 - An architectural response to the site's location within a residential environment, near the Campsie town centre and train station;
 - The architectural character will be compatible with the existing developments in the immediate context, but be clearly defined to give a variety of grain and character within this framework.; and
 - Layout and orientation of apartments will be designed to maximise amenity.

4.2 State Environmental Planning Policies

4.2.1 Housing SEPP 2021

The Housing SEPP commenced on 26 November 2021 consolidating five existing housing-related policies, with the intention of delivering more affordable, more diverse forms of housing and create new types of homes to meet the changing needs of people across NSW.

Division 5 of Part 2 of the Housing SEPP applies to land in the Greater Sydney region within 800 metres of a public entrance to a railway station of light rail station but *“does not apply to land on which development for the purposes of a residential flat building is permitted under another environmental planning instrument”*.

The principles of the Housing SEPP are as follows:

- (a) *enabling the development of diverse housing types, including purpose-built rental housing,*
- (b) *encouraging the development of housing that will meet the needs of more vulnerable members of the community, including very low to moderate income households, seniors and people with a disability,*
- (c) *ensuring new housing development provides residents with a reasonable level of amenity,*
- (d) *promoting the planning and delivery of housing in locations where it will make good use of existing and planned infrastructure and services,*
- (e) *minimising adverse climate and environmental impacts of new housing development,*
- (f) *reinforcing the importance of designing housing in a way that reflects and enhances its locality,*
- (g) *supporting short-term rental accommodation as a home-sharing activity and contributor to local economies, while managing the social and environmental impacts from this use,*
- (h) *mitigating the loss of existing affordable rental housing.*

This application is made pursuant to the provisions of Division 5 Part 2 to enable affordable housing to meet the needs of the more vulnerable members of the community, providing residents with a reasonable level of amenity in a location where it will make good use of existing and planned infrastructure and services. The development directly meets the principles of the Housing SEPP listed above.

The critical provision of Division 5 Part 2 of the Housing SEPP is clause 39(6), which provides:

- (6) *The Planning Secretary must not issue a certificate unless the Planning Secretary—*
- (a) *has taken into account comments, if any, received from the council within 14 days after the application for the certificate was made, and*
 - (b) *is of the opinion that the residential flat building is compatible with the surrounding land uses considering the following matters—*
 - (i) *the existing uses and approved uses of land in the area,*
 - (ii) *the impact that the residential flat building, including its bulk and scale, is likely to have on the existing uses, approved uses and uses that, in the opinion of the Planning Secretary, are likely to be the preferred future uses of the land,*
 - (iii) *the services and infrastructure that are or will be available to meet the demands arising from the development, and*
 - (c) *is of the opinion that the development is not likely to have an adverse effect on the environment and will not cause unacceptable environmental risks to the land.*

There are six express factors for consideration. First the Planning Secretary must take into account any comments received from the Council. The second matter is under the general rubric of compatibility with existing and future surrounding land uses. This is an opinion which must be formed before the certificate can be issued.

In forming the opinion about compatibility, the SEPP requires the Secretary to have regard to three matters: existing and approved neighbouring uses, the impact of the development on those uses and "*uses that, in the opinion of the Planning Secretary, are likely to be the preferred future uses of that land*" and the availability of services and infrastructure. By far the most important matter in this context is the likely preferred future uses of neighbouring land. Subclause (7) provides that the certificate if issued may certify that the development is only compatible if it satisfies the requirements specified in the certificate.

Finally, another opinion must be formed, that the development is not likely to have an adverse effect on the environment or cause any unacceptable environmental risks to the land.

What is a mandatory consideration is the question of compatibility. It is unnecessary to imply any further factors for consideration and it would seem to be contrary to the scheme of compatibility certification that other issues should interfere with the express statutory purpose, which clearly is not to set aside existing prohibitions unless the Secretary considered that the proposal was or could be made compatible with surrounding land uses.

The opinion of compatibility is wholly concerned with surrounding land, not the land proposed for development. Paragraph (b)(ii) requires regard to be had to the impact of the development including its bulk and scale "... on the existing uses, approved uses and uses that... are likely to be the preferred uses of **that land**". The reference to existing and approved uses picks up the reference in the preceding paragraph to the uses of land "in the vicinity of the development". The reference in paragraph (ii) to "that land" is to the land referred to in paragraph (i), and there can be no other construction of that provision, given that the opinion to be formed related to compatibility with "the surrounding land uses".

Compatibility is not a question of how well the proposed development measured up against the standards and requirements of the LEP for the subject land. Rather, it was a comparison between the proposed development and the surrounding land, including existing and future uses.

In this context, the draft Campsie Master Plan defines the future character of the area. It is reasonable to anticipate that development of the site will incorporate a much taller tower, while the development of surrounding land will also incorporate greater heights and dwelling densities to support the growth and urban renewal of Campsie.



Figure 9: Draft Height diagram – Draft Campsie town centre Masterplan

A detailed consideration of Division 5 of the Affordable Housing SEPP is included below:

Housing SEPP 2021	
Clause	Comment
3 Principles of Policy (a) enabling the development of diverse housing types, including purpose-built rental housing, (b) encouraging the development of housing that will meet the needs of more vulnerable members of the community, including very low to moderate income households, seniors and people with a disability,	The SCC will facilitate the development of 160 affordable dwellings (50% of the development) to be managed by a community housing provider for a minimum of 15 years in an area where it is urgently required. The NSW Communities & Justice Local Government Housing Kit database, states that as of September 2017, only 32.7% of rental stock in the Canterbury-Bankstown LGA was affordable for low income

<ul style="list-style-type: none"> (c) ensuring new housing development provides residents with a reasonable level of amenity, (d) promoting the planning and delivery of housing in locations where it will make good use of existing and planned infrastructure and services, (e) minimising adverse climate and environmental impacts of new housing development, (f) reinforcing the importance of designing housing in a way that reflects and enhances its locality, (g) supporting short-term rental accommodation as a home-sharing activity and contributor to local economies, while managing the social and environmental impacts from this use, (h) mitigating the loss of existing affordable rental housing. 	<p>housing households and 4.7% of rental stock was affordable for very low-income households. As a comparison to NSW standards as a whole, 54.1% of rental stock was affordable for low income housing households and 1.1% of rental stock was affordable for very low-income households. The comparison to NSW as a whole paints a bleak outlook for low and very low income families in the Canterbury-Bankstown LGA.</p> <p>Further, the ‘Supporting Economic Recovery in NSW’ report, released on 14 May 2020 to help the state recover from the COVID-19 pandemic argues the most immediate challenges are rapidly rising unemployment, the widespread failure of small and medium enterprises, falling incomes and wealth, and rising inequality and disadvantage.</p> <p>As noted earlier, the rental crisis in Campsie is profound and requires affordable rental housing to be built to ensure supply.</p> <p>The ideal policy response would simultaneously address these issues, with greater investment in social and affordable housing presenting a possible solution, the report states.</p> <p>In response to this, the development facilitated by the subject SCC supports the principles of the Housing SEPP by providing affordable dwellings within the Campsie town centre, within walking distance of the Campsie train station, connecting future residents to places of work, services and amenities and entertainment and recreation.</p> <p>The subject site is such land that the Housing SEPP contemplates for such a development. The subject site, is zoned for shop top housing, is anticipated to be zoned for mixed use in the future, is within the town centre, is located near existing residential flat buildings and is within walking distance of major transport infrastructure. The ability to gain the additional permitted use not available to other market sectors specifically supports the project financial model to deliver the social need.</p>
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	The proposed development is therefore consistent with the principles, and meets the locational requirements for compatibility.
<p><u>36 Land to which Division applies</u></p> <p>(1) This Division applies to the following land—</p> <ul style="list-style-type: none"> (a) land in the Greater Sydney region within 800m of— <ul style="list-style-type: none"> (i) a public entrance to a railway station or light rail station, or (ii) for a light rail station with no entrance—a platform of the light rail station, (b) land in the following towns within 400m of land in Zone B3 Commercial Core or Zone B4 Mixed Use, or an equivalent land use zone— <p>Albury, Ballina, Batemans Bay, Bathurst, Bega, Bowral, Cessnock, Charlestown, Coffs Harbour, Dapto, Dubbo, Glendale–Cardiff, Gosford, Goulburn, Grafton, Lismore, Maitland, Morisset, Newcastle, Nowra, Orange, Port Macquarie, Queanbeyan, Raymond Terrace, Shellharbour, Tamworth, Taree, Tuggerah–Wyong, Tweed Heads, Wagga Wagga, Warrawong, Wollongong.</p> <p>(2) This Division does not apply to land on which development for the purposes of residential flat buildings is permitted under another environmental planning instrument.</p>	<p>As illustrated in Figure 1 on page 3, the land is within 800 metres of the entrance to Campsie train station.</p> <p>The site is zoned B2 Local Centre under the Canterbury LEP 2012 under which '<i>residential accommodation</i>' is prohibited, which includes '<i>residential flat buildings</i>'.</p> <p>Therefore, Division 5 of Part 2 of the Housing SEPP applies to the subject site.</p>
<p><u>37 Development to which Division applies</u></p> <p>(1) This Division applies to development for the purposes of residential flat buildings carried out on land to which the Division applies —</p> <ul style="list-style-type: none"> (a) by or on behalf of a public authority or social housing provider, or (b) by a person who is carrying out the development with the Land and Housing Corporation. <p>(2) The Division does not apply to —</p> <ul style="list-style-type: none"> (a) development to which this Part, Division 1 applies, or (b) development to which Chapter 3, Part 4 applies. 	<p>Future development will be on behalf of Pacific Community Housing who will manage the affordable housing component of the future development for a period of 15 years.</p> <p>See Appendix I for communication from the community housing provider.</p>

<p><u>38 Development may be carried out with consent</u></p> <ol style="list-style-type: none"> (1) Development to which this Division applies may be carried out with consent. (2) Development consent must not be granted under this Division unless the consent authority is satisfied that— <ol style="list-style-type: none"> (a) the Planning Secretary has certified in a site compatibility certificate that, in the Planning Secretary’s opinion, the residential flat building is compatible with the surrounding land uses, and (b) if the development relates to a building on land in a business zone—no part of the ground floor of the building that fronts a street will be used for residential purposes unless another environmental planning instrument permits the use. (3) Nothing in this section prevents a consent authority from— <ol style="list-style-type: none"> (a) consenting to development on a site by reference to site and design features that are more stringent than the ones identified in a site compatibility certificate for the same site, or (b) refusing consent to development by reference to the consent authority’s own assessment of the compatibility of the residential flat building with the surrounding land uses, or (c) considering another matter in determining a development application. (4) Car parking is not required to be provided in relation to development to which this Division applies. 	<p>This application seeks a SCC for land at 124-142 Beamish Street and 16-18 Ninth Avenue, Campsie for the purpose of a residential flat building with a 50% component of affordable housing in accordance with the provisions of the Housing SEPP.</p> <p><i>‘Residential accommodation’</i> is prohibited in the existing B2 Local Centre zone under the Canterbury LEP 2012.</p> <p>The development outcome facilitated by the SCC application seeks to provide a development up to 25 storeys supporting the provision of approximately 320 units (160 affordable units), open space, a landscaped ground floor and parking spaces.</p> <p>This application specifically considers the compatibility of residential flat buildings within the context of the surrounding area and the future anticipated use under the draft Campsie Town Centre Master Plan. Residential flat buildings are near the site, which the draft Master Plan proposes zoning as B4 Mixed Use, within which a 20-storey residential flat development would be permitted. Therefore, the use itself is not uncommon in the area, and this also informs the anticipated future uses in the area.</p> <p>In terms of the compatibility of the bulk and scale, the proposed future development facilitated by the SCC generally complies with the maximum height limit anticipated by the draft Campsie Master Plan. The built form will be designed to ensure the development responds to its context and surroundings to ensure compatibility, including supporting the provision of ground floor non-residential uses given the existing and future business zones (refer to clause 38(2)(b)).</p> <p>The site does not have a density control currently applying to it. The future anticipated FSR for the site would not allow any uplift in density on the site. The additional density sought through the SCC process would be enough to facilitate a minimum of 160 affordable homes for a minimum of 15 years. In the context of the site’s location, surrounding controls and existing adjoining development, the proposal is considered compatible.</p>
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	<p>Having addressed the issues of compatibility, the proposed development will be subject to further assessment and refinement under an SSD process and at the development application stage.</p> <p>Finally, noting the location of the site to the train line and local bus network, active transport is encouraged. The development seeks to provide car parking spaces and bicycle parking and will support green modes of transport through a travel plan.</p>
<p><u>39 Site compatibility certificates</u></p> <p>(1) An application for a site compatibility certificate under this Division may be made to the Planning Secretary:</p> <p>(a) by the owner of the land on which the development is proposed to be carried out, or</p> <p>(b) by any other person with the consent of the owner of that land.</p> <p>(2) An application under this clause:</p> <p>(a) must be in a written form approved by the Planning Secretary, and</p> <p>(b) must be accompanied by the documents and information required by the Planning Secretary, and</p> <p>(c) must be accompanied by the fee, if any, prescribed by the regulations.</p> <p>(3) The Planning Secretary may request further documents and information to be furnished in connection with an application.</p> <p>(4) Within 7 days after the application is made, the Planning Secretary must provide a copy of the application to the council for the area in which the development is proposed to be carried out, unless the Planning Secretary refuses, before those 7 days have elapsed, to issue a certificate.</p> <p>(5) The Planning Secretary may determine the application by issuing a certificate or refusing to do so.</p> <p>(6) The Planning Secretary must not issue a certificate unless the Planning Secretary—</p> <p>(a) has taken into account comments, if any, received from the council within 14 days</p>	<p>This report supports the application for a SCC to facilitate the development of affordable housing, in an area, being the Canterbury-Bankstown LGA, in urgent need, on land within an established town centre and train station.</p> <p>The report addresses in detail the issues of compatibility with the surrounding uses, the impact the development may have on surrounding approved uses and uses that, in the opinion of the Planning Secretary, are likely to be the preferred future uses of that <i>surrounding</i> land. In summary, the key findings of the assessment of compatibility with surrounding development include:</p> <ul style="list-style-type: none"> • The site is ideally situated with the Campsie town centre, and within 150 metres of the entrance to the Campsie train station. • Council anticipates large scale change to the existing character of the area, as shown in the draft Campsie Town Centre Master Plan. • While there are a number of single storey dwelling houses in proximity of the site (mainly opposite on R4 High Density Residential zoned land), the proposed development is generally within the height limit of 20 storeys anticipated by the draft Master Plan. It is therefore reasonable to assume that future surrounding development would be of a medium and high density character with heights of up to 20 storeys, as illustrated in the Campsie Town Centre Masterplan height diagram.

<p>after the application for the certificate was made, and</p> <p>(b) is of the opinion that the residential flat building is compatible with the surrounding land uses considering the following matters—</p> <p>(i) the existing uses and approved uses of land in the area,</p> <p>(ii) the impact that the residential flat building, including its bulk and scale, is likely to have on the existing uses, approved uses and uses that, in the opinion of the Planning Secretary, are likely to be the preferred future uses of the land,</p> <p>(iii) the services and infrastructure that are or will be available to meet the demands arising from the development, and</p> <p>(c) is of the opinion that the development is not likely to have an adverse effect on the environment and will not cause unacceptable environmental risks to the land.</p> <p>(7) A certificate may certify that development is compatible with the surrounding land uses only if it satisfies certain requirements specified in the certificate.</p> <p>(8) A certificate continues to apply to the land in relation to which it was issued despite any change in the ownership of that land.</p> <p>(9) A certificate is valid for—</p> <p>(a) 5 years, or</p> <p>(b) otherwise—the period specified in the certificate.</p>	
<p><u>40 Must be used for affordable housing for 15 years</u></p> <p>(1) Development consent must not be granted under this Division unless the consent authority is satisfied that, for at least 15 years from the date of the issue of an occupation certificate—</p> <p>(a) at least 50% of the dwellings to which the development relates will be used for affordable housing, and</p>	<p>It is proposed that 50% of the accommodation of the future development will be used for the purpose of affordable housing.</p> <p>The community housing provider that will manage the affordable housing is Pacific Community Housing. See Appendix I for confirmation.</p>

<p>(b) the dwellings used for affordable housing will be managed by a registered community housing provider.</p> <p>(2) Subclause (1) does not apply to development on land owned by the Land and Housing Corporation or to a development application made by a public authority.</p>	
<p><u>41 Continued application of SEPP 65</u></p> <p>Nothing in this Policy affects the application of <i>State Environmental Planning Policy No 65—Design Quality of Residential Flat Development</i> to development to which this Division applies.</p>	<p>It is noted that SEPP 65 applies to any DA lodged against the site compatibility certificate as it relates to the land.</p> <p>While this application is for a SCC and is not for development, the built form will achieve compliance with SEPP 65.</p> <p>An SSD application has been lodged, anticipating this SCC application. The EIS process will ensure a design that addresses the principles of the SEPP relevant to the assessment of the SCC application that relates to context, neighbourhood character, built form and scale, and density. It is noted that there is some flexibility in the application of certain design requirements and criteria of the ADG as per Clause 75 of the Housing SEPP.</p>

Table 6: Assessment of Affordable Housing SEPP

4.2.2 Relationship with other environmental planning instruments

This application demonstrates the proposed development of a residential flat building at the controls sought, is compatible with the existing and future surrounding uses of the land.

4.2.3 SEPP (Resilience and Hazards) 2021

Clause 4.6 of State Environmental Planning Policy (Resilience and Hazards) 2021 requires the consent authority to consider whether land is contaminated during the development application process. A Phase 1 Contamination Investigation was conducted in 2015 by Benviron Group to “*determine the potential for onsite contamination arising from any areas of concern located within the site and its surrounding area*”.

A site visit was undertaken on 25th November 2015. The Study, which is included at Appendix G, concludes:

*Based on the results of this investigation it is considered that the risks to human health and the environment associated with soil contamination at the site are medium in the context of the proposed use of the site. The site **can be made suitable** for the proposed development, subject to the following recommendations:*

- *A Detailed Environmental Site investigation should be undertaken across the entire site area in order to clarify the data gaps identified within this report.*
- *A hazardous materials assessment of the buildings should be undertaken prior to demolition being carried out on site.*

If during any potential site works any significant unexpected occurrence is identified, site works should cease in that area, at least temporarily, and the environmental consultant should be notified immediately to set up a response to this unexpected occurrence.

A Hazardous Materials Assessment was also undertaken in April 2022 by Foundation Earth Sciences. The report is included at Appendix H. That report concluded:

“In conclusion, our findings have identified for a hazardous materials survey (as per the materials register below) to be conducted at the property and have determined that the site, as it currently stands, that asbestos/cadmium/lead/PCB/chemical was identified to be present within the site. Further delineation is required when access to the inaccessible areas becomes available prior to demolition. Only when the identified buildings are to be renovated or demolished do all materials containing asbestos need to be appropriately removed”.

A further Assessment in the form of a Stage 2 Investigation will be prepared as part of the SSD process.

4.2.4 SEPP 65 Design Quality of Residential Apartment Development

SEPP 65 seeks to improve the design quality of residential apartment development and enhance streetscapes and neighbourhoods in New South Wales to deliver a better living environment for the residents now choosing this form of housing. It does this by establishing a consistent approach to the design and assessment of apartments and the way they are assessed.

Compliance with SEPP 65 and the Apartment Design Guidelines informed the building footprint and proposed massing envelope sought by the proposed development outcome.

The previous architectural design concept illustrates how the design decisions can be based on opportunities and constraints of the site conditions and their relationship to the surrounding context. This is included in the former indicative Architectural Design Concept at Appendix B and C.

A Design Statement is not included, although as the concept for the built form evolves, it will consider the key criteria of SEPP 65 in support of the application. The EIS process will ensure that the future development of the site can comply with the SEPP 65 Design Principles. This is also demonstrated by the indicative floor plans in the attachments. Additional detailed assessment against SEPP 65 and the Apartment Design Guidelines will support future applications for development.

4.3 Canterbury LEP 2012

Canterbury Local Environmental Plan (LEP) commenced on the 21 December 2012 when it was published on the NSW Government Legislation website.

Table 7 below summarises the Canterbury LEP 2012 principal development standards that currently apply to the subject site:

Land Zoning	Maximum Building Height	Maximum Floor Space Ratio (FSR)	Minimum Lot Size
B2 Local Centre	21 metres	N/A	N/A

Table 7: Site Development Standards

The development is consistent with the objectives of the Canterbury LEP 2012. The following are of relevance:

- a) to provide for a range of development that promotes housing, employment and recreation opportunities for the existing and future residents of Canterbury,
- (b) to promote a variety of housing types to meet population demand,
- (c) to ensure that development is of a design and type that supports the amenity and character of an area and enhances the quality of life of the community,
- (d) to create vibrant town centres by focusing employment and residential uses around existing centres and public transport nodes,

The site is within the Campsie town centre and nearby the train station entrance so is perfectly located with regards to access to public transport infrastructure and services and public amenities. This also connects residents to the region, the Sydney CBD and Greater Sydney. Concentrating development, such as that proposed, in such a location, that is compatible with its surroundings therefore directly achieves this objective, while also providing housing choice for residents within the Campsie Town Centre and broader Canterbury-Bankstown LGA.

4.3.1 Zoning

The site is zoned B2 Local Centre the Canterbury LEP 2012. 'Residential accommodation' is prohibited in the B2 Local Centre zone. Therefore, Division 5 of Part 2 of the Housing SEPP applies.

B2 Local Centre

1 Objectives of zone

To provide a range of retail, business, entertainment and community uses that serve the needs of people who live in, work in and visit the local area.

- To encourage employment opportunities in accessible locations.
- To maximise public transport patronage and encourage walking and cycling.

- To facilitate and support investment, economic growth and development for active, diverse and well-designed centres.

2 Permitted without consent

Home occupations

3 Permitted with consent

Boarding houses; Centre-based child care facilities; Commercial premises; Community facilities; Educational establishments; Entertainment facilities; Function centres; Hostels; Information and education facilities; Light industries; Medical centres; Oyster aquaculture; Passenger transport facilities; Recreation facilities (indoor); Registered clubs; Respite day care centres; Restricted premises; Roads; Service stations; Shop top housing; Tank-based aquaculture; Tourist and visitor accommodation; Any other development not specified in item 2 or 4

4 Prohibited

Agriculture; Air transport facilities; Airstrips; Animal boarding or training establishments; Biosolids treatment facilities; Boat building and repair facilities; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Correctional centres; Crematoria; Depots; Eco-tourist facilities; Electricity generating works; Environmental facilities; Exhibition homes; Exhibition villages; Extractive industries; Forestry; Freight transport facilities; Heavy industrial storage establishments; Helipads; Highway service centres; Home occupations (sex services); Industrial retail outlets; Industrial training facilities; Industries; Jetties; Marinas; Mooring pens; Moorings; Mortuaries; Open cut mining; Pond-based aquaculture; Recreation facilities (major); Recreation facilities (outdoor); Research stations; Residential accommodation; Resource recovery facilities; Rural industries; Sewage treatment plants; Storage premises; Transport depots; Truck depots; Vehicle body repair workshops; Waste disposal facilities; Water recreation structures; Water recycling facilities; Water supply systems; Wharf or boating facilities



Figure 10: Canterbury LEP 2012 Land Zoning Map

Clause 36 of Division 5 of Part 2 of the Housing SEPP states:

This Division applies to the following land:

- (a) *land in the Greater Sydney region that is within 800 metres of:*
 - (i) *a public entrance to a railway station or light rail station, or*
 - (ii) *for a light rail station with no entrance—a platform of the light rail station,*

This Division does not apply to land on which development for the purposes of residential flat buildings is permitted under another environmental planning instrument.

As discussed, residential accommodation is not permitted in the B2 Local Centre zone. The site adjoins B2 Local Centre zoned land, which forms part of the Campsie town centre. Existing surrounding heights range within many buildings below the maximum building height, with some redevelopment having occurred up to 6 or 7 storeys. The Campsie train station is 150 metres away being the main public transport hub serving the centre.

All structures on the site were recently demolished. The site is within the Campsie Town Centre. The draft Campsie Town Centre Master Plan anticipates large scale changes to the character of the area along Beamish Street and surrounds.

In this regard, the extension of permissibility of 'residential flat building' development to this site would be consistent nearby existing neighbouring development, the anticipated future development and character of

the area, and the desired future development intensity of the Campsie town centre. It is noted the minimal redevelopment has occurred to date as the controls do not facilitate and encourage viable redevelopment. Therefore, considering the objectives of the existing B2 Local Centre zone, the development achieves the following:

To provide a range of retail, business, entertainment and community uses that serve the needs of people who live in, work in and visit the local area

- The application will facilitate a future development that provides for the housing needs of the community, as identified by the Greater Sydney Plan, the South District Plan and the Canterbury-Bankstown Local Strategic Planning Statement.
- The application will facilitate a housing product which is currently very short on supply but high in demand. The provision of affordable housing directly supports the need to supply housing that meets the needs of the LGA's population.

To maximise public transport patronage and encourage walking and cycling.

- The site adjoins B2 Local Centre and R4 High Density Residential zoned land and is within the Campsie town centre, which accommodates all the goods, services and convenience shops associated with a local centre.
- The site is also 150 metres from Campsie train station. The site therefore achieves many of the locational attributes identified by the objectives having excellent proximity to public transport, jobs and employment opportunities within a walkable catchment area.

4.3.2 Height of Buildings

Under the Canterbury LEP 2012, the maximum height of building control that applies to the subject site is 21 metres, as illustrated in Figure 11 below.

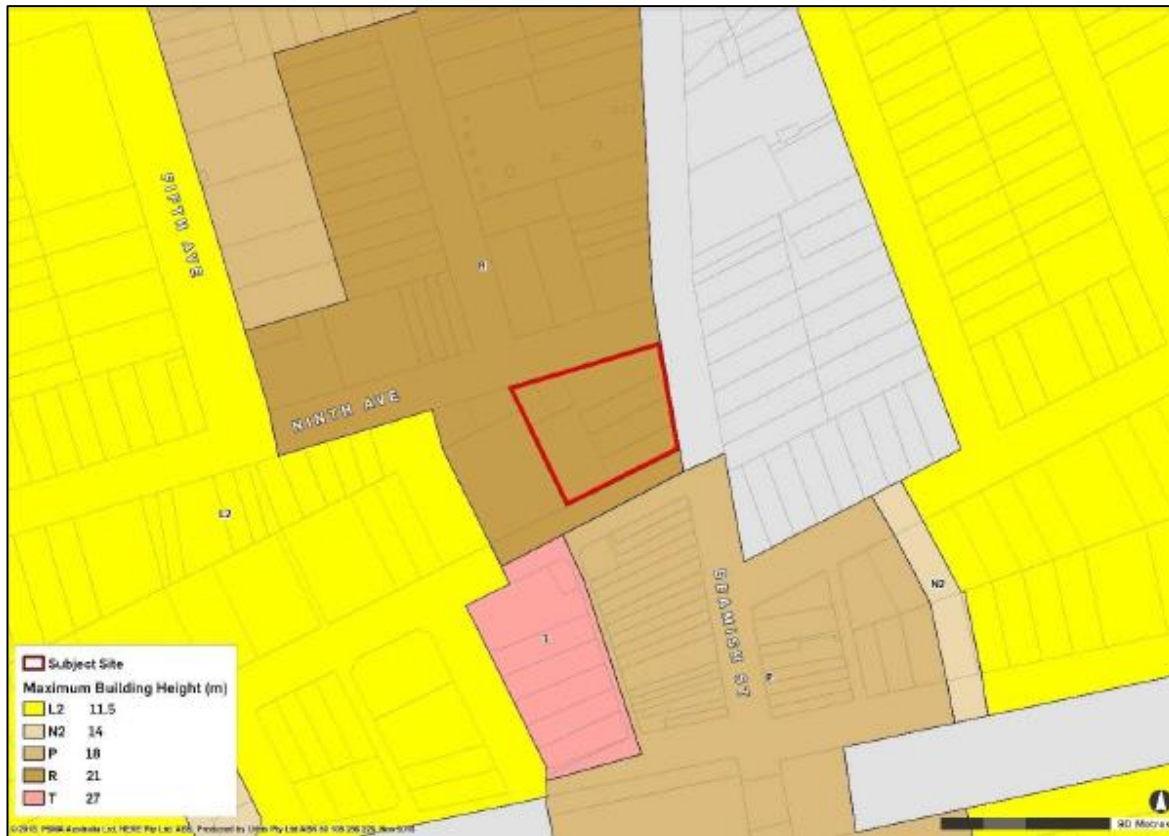


Figure 11: Canterbury LEP 2012 Building Height Map

While the current built form of the area is lower density commercial, and some 6 to 7 storey shop top housing, the anticipated future built form is medium and high density development to meet the objectives of a 'strategic centre' and the aspirations of the Greater Sydney Plan and Canterbury Bankstown LSPS.

The proposed development facilitated by the SCC is a development with two 25-storey towers.

In this respect, the development exceeds the current maximum height limit and the future anticipated height limit. The adopted heights and elevation will be designed specifically for this site, to support the viable redevelopment of the site, support the provision of affordable housing, minimise any adverse impacts from overshadowing and ensure compatible with the future anticipated character and built form.

In terms of overshadowing associated with the proposed height, the Campsie Town Centre masterplan has studied potential greater heights in the centre, identifying 20 stories as appropriate for the subject site. The additional impact from the additional 5 storeys is minimal, as illustrated in the supporting design reports which include overshadowing analysis. Notwithstanding, it is proposed to undertake further detailed study of the overshadowing impact and how design features and orientation can ensure acceptable outcomes to existing and future development to the south.

Therefore, in relation to compatibility of the height to surrounding development and future anticipated built form, the development is compatible with the "existing uses and approved uses of land in the area" and "the

impact that the residential flat building, including its bulk and scale, is likely to have on the existing uses, approved uses and uses that, in the opinion of the Planning Secretary, are likely to be the preferred future uses of the land”, in accordance with Clause 39(6) of the Housing SEPP.

4.3.3 Floor Space Ratio

Under the Canterbury LEP 2012, there is no maximum floor space ratio (FSR) control that applies to the subject site. The development concept that supports this SCC application provides approximately 320 units at a density of 8.03:1. Note the application is supported by two concepts which will be subject to future detailed design through the SSD EIS process and through presentations with the State Design Review Panel.

4.3.4 Heritage

Opposite the site on Beamish Street is the former Orion Theatre which is identified as an item of local environmental heritage under the Canterbury LEP 2012. The proposed increased maximum building height on the site will potentially impact on the values of the heritage item. This potential impact is considered insignificant and can be appropriately addressed as part of any future development application for the site. It is noted that the shadow associated with the future development at 25 storeys does not begin to start to impact the Orion Theatre until between 2pm 3pm on the 21 June.

A heritage impact assessment addressing this matter prepared by Urbis is attached in Appendix E.

4.3.5 Acid Sulfate Soils

This clause and associated mapping details acid sulphates soils within the Canterbury-Bankstown LGA. The site is identified in the Canterbury LEP 2012 as having Class 5 Acid Sulfate Soils risk. Although the proposal seeks to intensify the land use on the site, the zone already permits residential in the form of shop top housing (albeit prohibits ‘residential accommodation’). Therefore the risk of potential exposure or disturbance of acid sulfate soils will not increase as a result of the proposal. The consideration of potential acid sulfate soils will be addressed as part of any future development application for the site.

5 Strategic Context

This section considers the strategic planning framework relevant to the subject site. The strategic context is considered having regard to the existing zone, the surrounding zones and development patterns, and the proposal for the site that seeks to facilitate a 25 storey development supporting an important affordable housing contribution to the Canterbury-Bankstown LGA.

5.1 A Metropolis of Three Cities – The Greater Sydney Region Plan

In March 2018, the NSW Government published A Metropolis of Three Cities – The Greater Sydney Region Plan (The Plan). The Plan is built on a vision of three cities where most residents live within 30 minutes of their jobs, education and health facilities, services and great places. This is consistent with the 10 Directions in Directions for a Greater Sydney which establish the aspirations for the region over the next 40 years and are a core component of the vision and a measure of the Plan's performance.

The Plan further projects the population of Greater Sydney to grow to 8 million over the next 40 years. The Plan seeks to rebalance the economic and social opportunities and leverage that growth and deliver the benefits more equally across Greater Sydney. The goals are for:

- residents to have quick and easy access to jobs and essential services;
- housing supply and choice to increase and meet the growing and changing needs of the community;
- the environment and precious resources to be protected; and
- Infrastructure to be sequenced to support growth and to be delivered concurrently with new homes and jobs.

To meet the needs of a growing and changing population the vision seeks to transform Greater Sydney into a metropolis of three cities:

- the Western Parkland City
- the Central River City
- the Eastern Harbour City.

The site is located in the Eastern Harbour City. The population of the Eastern Harbour City is projected to increase from 2.4 million people to 3.3 million people over the next 20 years.

The subject site is 150 metres of the entrance to the Campsie train station, connecting the site to the wider region and the Sydney CBD.

The site is within the Campsie town centre, with all the goods, services and convenience shops associated with a town centre. The site therefore achieves many of the locational attributes identified in the Plan having excellent proximity to public transport, jobs and employment opportunities within a walkable catchment area.

Campsie is identified as a “strategic centre” the Greater Sydney Region Plan. Under the Plan, a strategic centre is expected to accommodate high levels of private sector investment, enabling them to grow and evolve. The increased development potential for the site facilitated by this proposal will contribute to the provision of jobs and homes identified in the Greater Sydney Region Plan and for Campsie as a “strategic centre”.

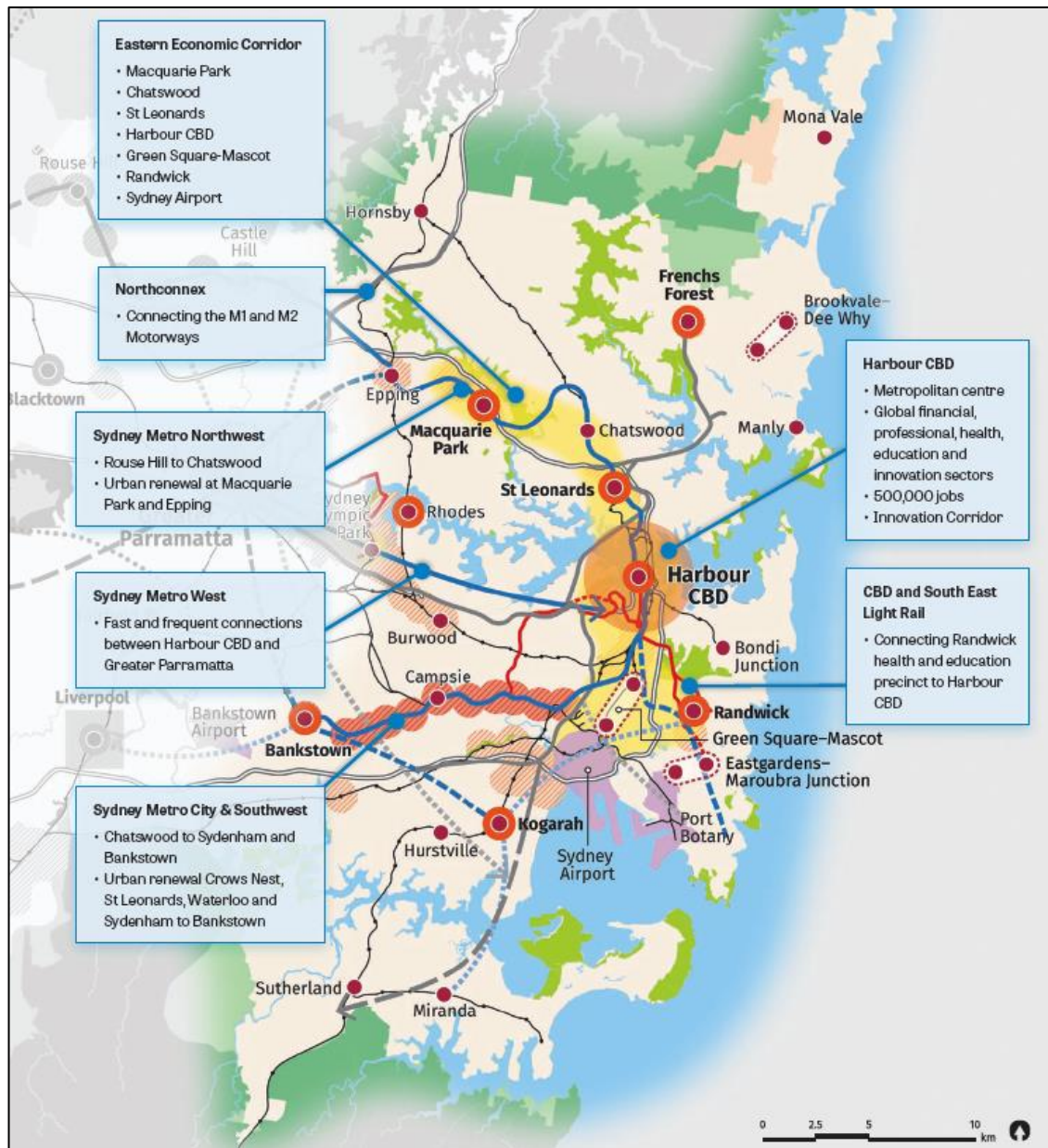


Figure 12: Eastern Harbor City Structure Plan

To achieve the objectives for the Eastern Harbour City, the plan includes 10 directions and 40 objectives, supporting actions and priorities for each “City”.

To improve liveability, The Plan seeks to create new great places, with well-connected communities which have access to a range of jobs and services, starting with public places, open spaces and transit-oriented

developments. This SCC application seeks to deliver affordable housing close to public transport connecting residents to a network of jobs and opportunities.

Direction 4 “Housing the City” of the Greater Sydney Plan seeks to provide housing choice for people, which can be achieved through “greater housing supply”, “increased housing completions” and “more diverse and affordable” housing.

The NSW Communities & Justice Local Government Housing Kit database, states that as of September 2017, only 32.7% of rental stock in the Canterbury-Bankstown LGA was affordable for low income housing households and 4.7% of rental stock was affordable for very low-income households. As a comparison to NSW standards as a whole, 54.1% of rental stock was affordable for low income housing households and 1.1% of rental stock was affordable for very low-income households. SQM Research shows that only 91 dwellings were available for rent in the whole of Campsie in June 2022. The comparison to NSW as a whole paints a very bleak future for low-income families in the Canterbury-Bankstown LGA.

This application for a SCC will facilitate and contribute 320 dwellings, increasing housing supply, 50% of which will be affordable homes. The site benefits from its location close to Campsie train station connecting the site to the region and other parts of Greater Sydney.

The site is underutilised in its context of being within an established town centre, located near a train station connecting the site to Sydney, and a future anticipated built form allowing medium and high density development. The site has the ability to redevelop in the short term, meeting the desire and strategic planning framework of urban renewal in this location, connecting new residents with other parts of the region, the Harbour CBD and nearby residents with new jobs. The site is within the 30-minute city objective.

The purpose of the Housing SEPP is to promote the delivery of housing in locations where it will make good use of existing and planned infrastructure and services and to meet the needs of more vulnerable members of the community, including low to moderate income households. Division 5 of Part 2 of the Housing SEPP seeks to achieve this purpose by supporting affordable housing in locations where development is compatible with its surroundings and context.

The site is located in an evolving high density urban environment. It can be concluded that the application for an SCC meets a key objective of the Act, meets the objectives of the SEPP, and is consistent with the provisions of the LEP; which contemplates provisions of a SEPP that may prevail over the LEP under Section 3.38 of the EP&A Act 1979.

While the subject SCC application does not seek consent for any development, it will facilitate the provision of additional housing while balancing this with high standards of amenity and design. The actions of the Greater Sydney Region Plan will be realised through future applications for development.

5.2 South City District Plan

Greater Sydney’s three cities identified in the Greater Sydney Region Plan – A Metropolis of Three Cities reach across five districts. The South District covers the Canterbury- Bankstown, Georges River and Sutherland local

government areas. The district connects to the Central River City through Bankstown and to the Western Parkland city through Liverpool.

The South District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to achieve the 40-year vision for Greater Sydney. The goal of the Plan is to “*have well-coordinated, integrated and effective planning for land use, transport and infrastructure*”. The District Plan provides the means by which the Greater Sydney Region Plan can be put into action at the local level.

“The South District will continue to grow over the next 20 years with demand for an additional 83,500 dwellings. This will be provided through urban renewal, around new and existing infrastructure, and infill developments. The focus of growth will be on well-connected, walkable places that build on local strengths and deliver quality public places.”

In undertaking strategic planning processes, and/or preparing or considering planning proposals, planning authorities must give effect to the District Plan, specifically the Planning Priorities and Actions. While this application is not for development and does not seek to amend the Canterbury LEP 2012, it does seek to facilitate a significant benefit of affordable rental housing through the provisions if the Housing SEPP, which will be realised through future DAs.

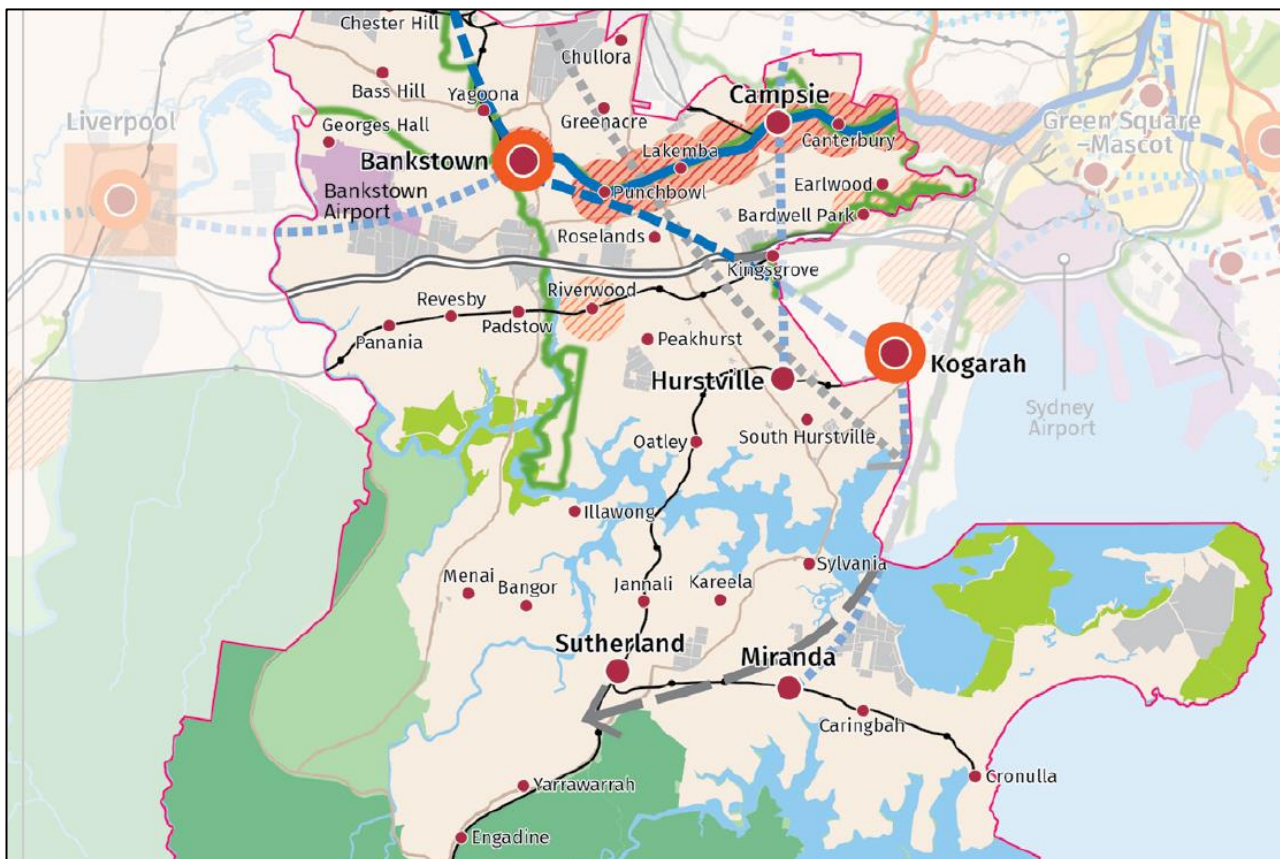


Figure 13: Extract from South District Structure Plan

In the South District the greatest increase in population is expected in Canterbury-Bankstown Local Government Area, where 70 per cent of new residents (142,450 additional people by 2036) will be accommodated due to anticipated urban renewal. *“The South District will continue to grow over the next 20 years with demand for an additional 83,500 dwellings. This will be provided through urban renewal, around new and existing infrastructure, and infill developments.”*

Further, the Plan sets a 0-5 year housing target for the District of 23,250, with 13,250 of these new dwellings targeted to be built in the Canterbury Bankstown LGA. The SCC application will facilitate future development applications that support an additional 320 dwellings of which 50% will be affordable – this is nearly 2.5 per cent of the new dwellings target for the LGA for the next 0-5 years.

5.3 Sydenham to Bankstown Urban Renewal Corridor Strategy

The site is within the Campsie Precinct under the Sydenham to Bankstown Urban Renewal Corridor which has been identified for urban renewal in the Greater Sydney Regional Plan and in conjunction with the increased capacity of the public transport network resulting from the Sydney Metro City and Southwest upgrade of the Sydenham to Bankstown Railway corridor.

While the Department of Planning and Environment has announced a new approach to the corridor to develop a high-level, principle-based planning strategy for the corridor, the Sydenham to Bankstown Urban Renewal Corridor Strategy provided a framework and identified a strategic direction for growth through the corridor. For background context, that strategy proposed changes to land use and built form controls that would provide over 35,000 dwellings to be constructed across the 11 existing station precincts in the corridor. For Campsie, the strategy envisaged approximately 6,000 additional dwellings within the precinct by 2036.

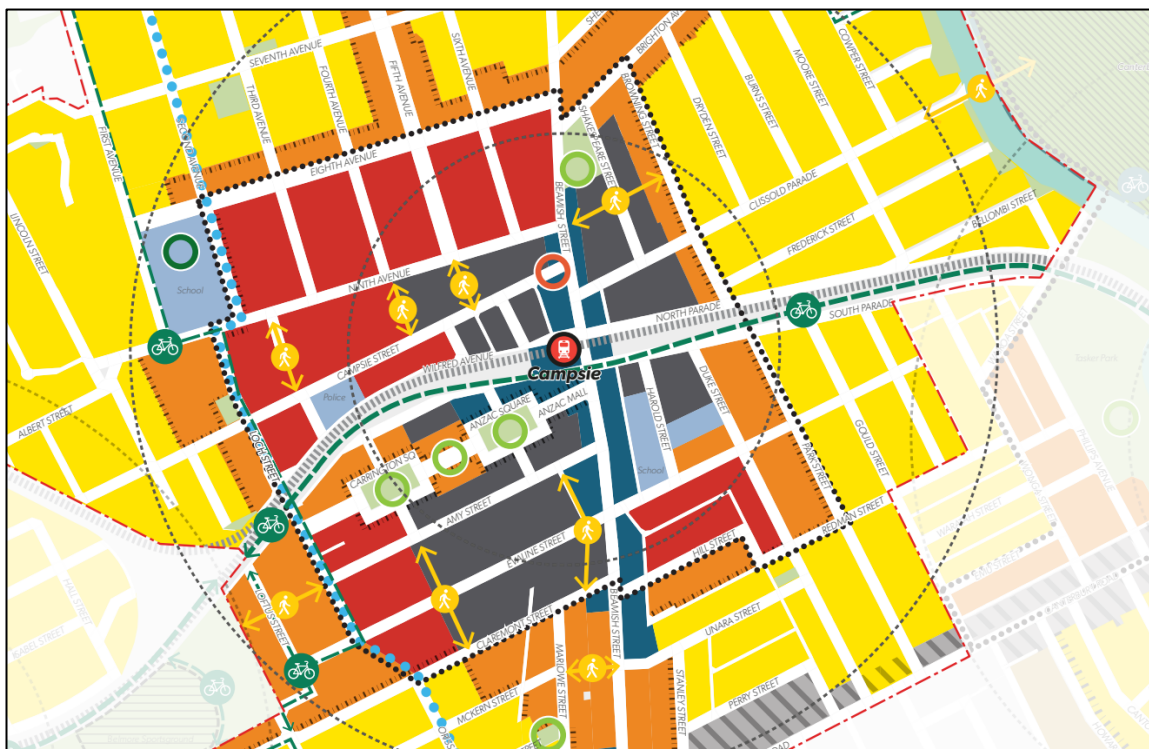


Figure 14: Campsie Precinct exert (source: Sydenham to Bankstown Corridor Strategy)

The Sydenham to Bankstown Urban Renewal Strategy includes precinct plans for each of the station precincts in the area. The area around the Campsie Railway Station (including the subject site) is identified as suitable for high rise and/or mixed-use development. The precinct plan identifies the Beamish Street retail strip as suitable for increased height and density as part of the revitalisation of the Campsie town centre.

While no Section 9.1 Direction was released to enforce the strategy, the proposal aligns with the desired future character and the emerging strategic planning direction identified in the council's local strategic planning statement and draft town centre masterplan. These strategies reflect the work previously undertaken as part of the corridor strategy.

5.4 Canterbury Bankstown Local Strategic Planning Statement

Canterbury-Bankstown's commercial centres are distributed across the City. They form the focus for surrounding residential areas, with local services, community and civic places and public transport. They are intended to be convenient and cost effective for small business. There is a total of 88 centres, with 34 larger centres that provide for the needs of surrounding residential areas. The site is identified as a Town Centre. Connective City 2036 sets directions for town centres, noting the following:

"Bankstown and Campsie are Canterbury- Bankstown's primary centres. These will continue to see an increase in well-designed medium and high-density housing along with infrastructure improvements, jobs and business opportunities. We aim to match this growth with improved building and public domain design, pedestrian safety and public transport."

The site has an important role to play in the future of the Canterbury Bankstown LGA. Housing, job growth and local economies are expected to increase in line with transport infrastructure investment and required strategic planning to ensure appropriate outcomes are achieved. Connective City 2036 makes the following statement:

"The Sydenham to Bankstown Metro corridor has been identified by the NSW Government as a location for new housing. We will aim to maintain the character of these areas and plan to develop adjoining and surrounding lands and sites, including high-density development. We will work with the NSW Government on a high-level principles-based strategy and place plans for each centre in consultation with the community."

"Greatest growth will be planned for the centres of Canterbury, Campsie, Belmore, and Lakemba, with more modest growth in Punchbowl, Wiley Park and Hurlstone Park."

While the site is earmarked for an increase in density and land use mix, incentive is required to attract investment to ensure intentions from within the Connective City 2036 are realised. Without a clear incentive to facilitate the objectives at both a local and state level, it will be difficult to ensure the strategic visions are realised. The proposal seeks to deliver on this increase in density and land use and is consistent with the intentions of the Connective City 2036.

5.5 Draft Campsie Town Centre Master Plan

The draft Campsie Master Plan aims for “*Beamish Street to evolve into one of Sydney’s premier main street destinations. Building on the strength and character of Beamish Street as a high street and increase its attractiveness as a 24-hour destination providing a range of activities and uses both day and night- ranging from outdoor dining, to entertainment, retail and events.*”

The Master Plan also calls on The Intensification Strategy, that identifies the “*areas of Campsie that are seen to have the potential to respond to the increased demand for dwellings and employment. The areas identified will require updated planning controls and will help establish Campsie as a Strategic Centre. The Intensification Strategy is based on the analysis of opportunities and constraints included in the earlier phases of this Master Plan, the analysis performed as part of the Tall Buildings Study, and finally the Spatial Actions...*”

Intensification is to happen within walking distance of the Metro Station, leveraging key sites under single ownership, as key land holders which can have a positive role in achieving the vision for Campsie, while retaining the character of Beamish Street, by maintaining the active frontages and multiple shops along the street.

The subject site at 124-142 Beamish Street and 16-18 Ninth Avenue is slated for intensification. The following figures illustrate the strategic direction and desired future character for the site and surrounding land. The figures should be considered in the context that they have not been endorsed by the council of the DPE as of August 20022.

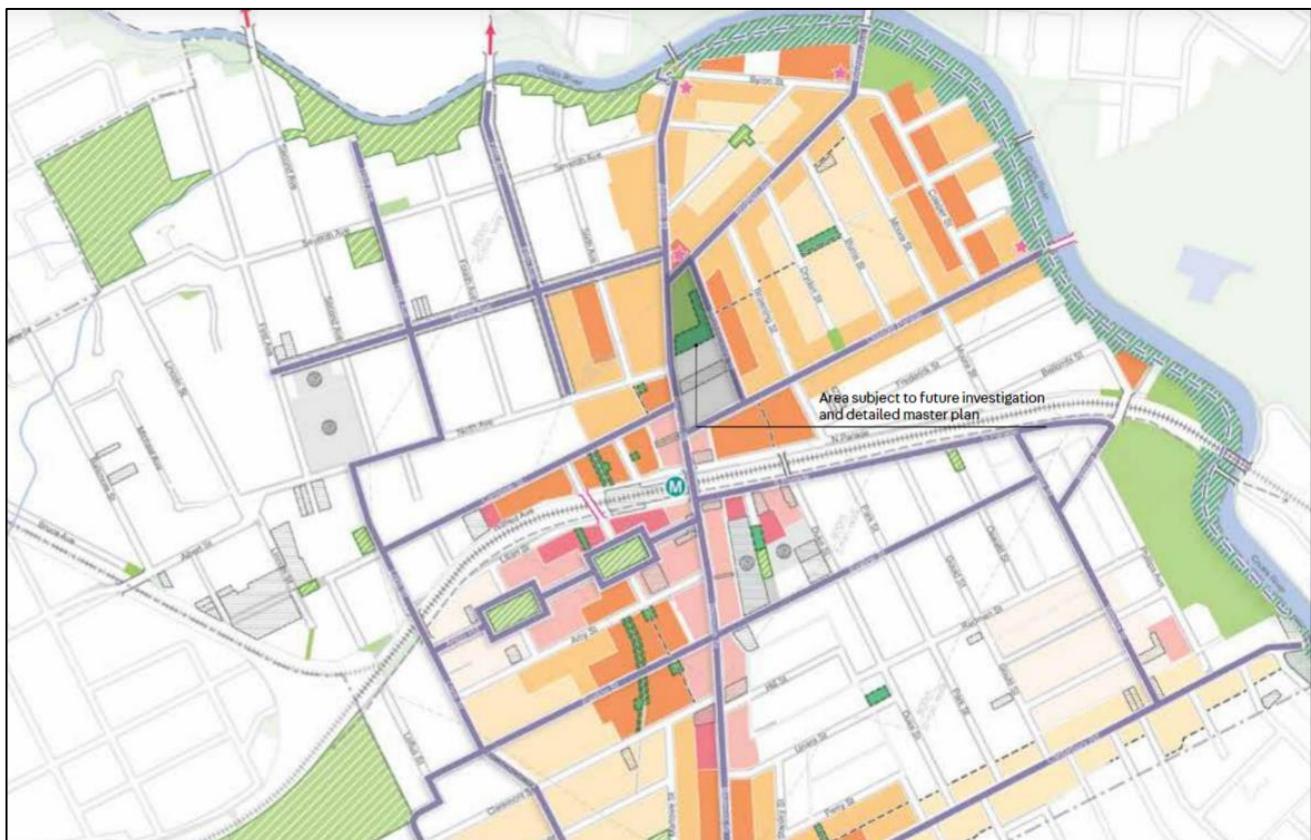


Figure 15: Draft Campsie town centre Masterplan



Figure 16: Proposed Maximum Height of Buildings, Campsie Town Centre Master Plan

The Strategy proposes the following planning controls and design outcomes for the site:

Control/design	Strategy
Land Use	Mixed use
Building typology	Mixed use podium with tower Open Space
Building Height	Up to 20 storeys
Street Wall	1-3 storeys
Open Space	Small civic plaza
Connections	Rear laneway
FSR	Base FSR – 1.8:1 Proposed FSR – 4.5:1
Affordable Housing	<i>Introduce an Affordable Housing Contributions Scheme in the Local Environmental Plan as part of achieving an incentive height and floor space ratio, requiring new developments to provide 3% of total dwellings as affordable dwellings, or a monetary contribution of \$198 per square metre* of total residential gross floor area to be dedicated to the development of affordable housing.</i>

Table 8: Draft Campsie town centre planning controls

The Master Plan also provides objectives and actions to increase housing supply and deliver affordable rental housing as part of new developments. This will help mitigate impacts and encourage gentrification and enable very low, low and low-moderate-income households remain in Campsie. Campsie currently provides lower cost housing compared to other neighbouring centres, although over the course of 2022, this has become less so.

The Master Plan also seeks to *“Increase residential dwelling capacity consistent with the intensification strategy, land use strategy and the proposed height and floor space ratios outlined in this Plan.”* However, the base FSR proposed for the site at 124-142 Beamish Street at 1.8:1, will not result in any new development on the site, let alone intensification and viable affordable housing. Figure 17 shows the proposed FSR.

Urbis, independently from this firm, tested two development scenarios for the previous scheme, a 20-storey mixed use development at 6.2:1 and a 25 storey mixed use development at 8.0:1. Urbis found that the 20-storey scheme was not viable (with a developer profit and risk margin of less than 20 per cent) and that a 25-storey scheme would be just viable. This study is attached at Appendix D for reference and to support the proposed height and density advanced by this proposal.

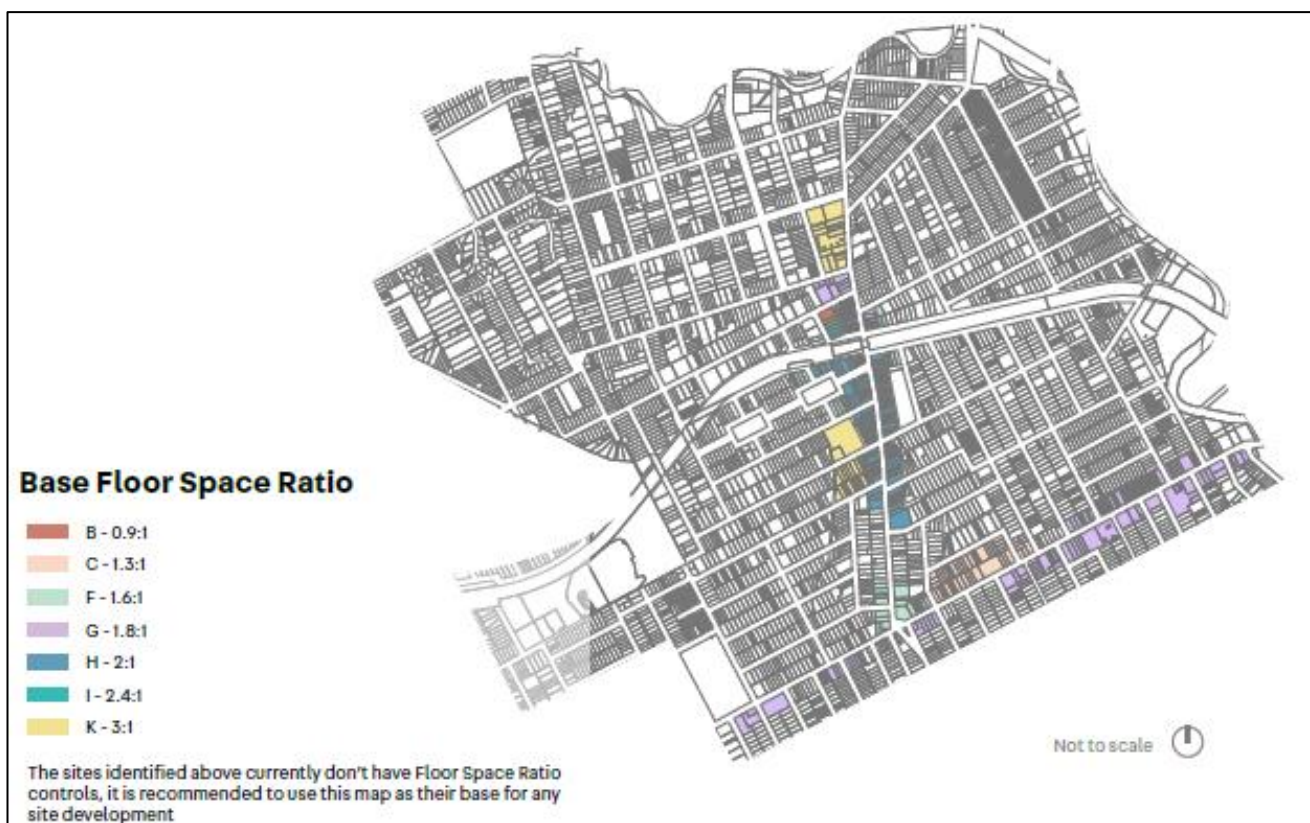


Figure 17 Proposed Base Floor Space Ratio (Source: Revised Draft Campsie Town Centre Master Plan, Canterbury Bankstown Council, February 2022)

6 Need for Affordable Housing

6.1 Social and Economic Impact

The proposed development would be facilitated through the provisions of the Housing SEPP 2021. The Housing SEPP requires that 50% of the units in a development are rented as affordable housing by a community housing provider (CHP) for no less than 15 years. Under the proposed scheme, 160 apartments would be leased and managed by Pacific Community Housing.

The proposed development is likely to have few negative social impacts. It is likely that the positive impacts will far outweigh the negative impacts, with affordable housing need significantly increased in the LGA.

6.1.1 Strategic Context

An examination of housing needs reaffirms the critical importance of providing a diversity of housing across the housing continuum in Greater Sydney. The continuum recognises the fundamental importance of household income on the ability to access housing of different types, cost and tenure. Households on moderate, low or very low incomes, who spend more than 30 per cent of their income on housing, are impacted in their ability to pay for essential items like food, clothing, transport and utilities.

Lower income households (earning up to approximately \$67,600 per annum) without other financial support cannot afford the average rental cost for even more moderately priced areas of Greater Sydney, which are generally on the outskirts of Greater Sydney.

Cities require a range of workers to be close to centres and jobs. An absence of affordable housing often results in workers having to commute for long distances.

Many moderate-income households face housing diversity and affordability challenges – typically households with incomes of \$67,400–\$101,400 per annum. Recent research indicates that about half of young Greater Sydney residents are considering leaving Greater Sydney within the next five years, with housing affordability being a key issue. It also highlights that smaller well-located dwellings are considered an acceptable approach to reducing housing cost.

As previously discussed, the NSW Communities & Justice Local Government Housing Kit database, states that as of September 2017, only 32.7% of rental stock was affordable for low income housing households and 4.7% of rental stock was affordable for very low-income households in the Canterbury Bankstown LGA. As a comparison to NSW standards as a whole, 54.1% of rental stock was affordable for low income housing households and 1.1% of rental stock was affordable for very low-income households. Compared with NSW as a whole, the proportion of affordable rental stock is low in the Canterbury-Bankstown LGA.

Further, the ‘Supporting Economic Recovery in NSW’ report, released on 14 May 2020 to help the state recover from the COVID-19 pandemic argues the most immediate challenges are rapidly rising unemployment, the widespread failure of small and medium enterprises, falling incomes and wealth, and rising inequality and

disadvantage. The ideal policy response would simultaneously address these issues, with greater investment in social and affordable housing presenting a possible solution, the report states.

"This is a prime opportunity for the NSW government to work with the community housing sector and the construction industry to invest in social and affordable housing, and support jobs, SMEs and NSW's vulnerable citizens," NCOSS chief executive Joanna Quilty is quoted as saying when the report was released. The Equity Economics modelling was commissioned by the NSW Council of Social Service, Homelessness NSW, Shelter NSW, the Community Housing Industry Association and the Tenants' Union of NSW.

Further, council's LSPS nominates Bankstown and Campsie as Canterbury- Bankstown's primary centres, that will continue to see an increase in well-designed medium and high-density housing along with infrastructure improvements, jobs and business opportunities. Council aims to match this growth with improved building and public domain design, pedestrian safety and public transport. The site has an important role to play in the future of the Canterbury Bankstown LGA. Housing, job growth and local economies are expected to increase in line with transport infrastructure investment and required strategic planning to ensure appropriate outcomes are achieved. Connective City 2036 makes the following statement:

"The Sydenham to Bankstown Metro corridor has been identified by the NSW Government as a location for new housing. We will aim to maintain the character of these areas and plan to develop adjoining and surrounding lands and sites, including high-density development. We will work with the NSW Government on a high-level principles-based strategy and place plans for each centre in consultation with the community. Greatest growth will be planned for the centres of Canterbury, Campsie, Belmore, and Lakemba, with more modest growth in Punchbowl, Wiley Park and Hurlstone Park."

If the proposed use of a residential flat building was able to be provided without the incentives of an additional permitted use under Division 5 of Part 2 of the Housing SEPP, the ability to provide the social need in the form of lower cost housing for those in the community that qualify would not be possible. History shows that new housing supply generated in the local market is targeted at significantly higher cost housing. The increased value created through the additional use, specifically enables those gains of increased value into the financial model of the project to support the provision of the social need without the burden of a specific levy that transfers those deadweight costs to other market sectors.

The proposal is compatible within its context and supports the Government's and Council's objectives to increase the provision of affordable housing while promoting the efficient use of public transport and existing infrastructure.

6.1.2 Affordable Housing Taskforce Report

The NSW Affordable Housing Taskforce released their interim report in March 2012. In this report, the Taskforce notes that *"Housing NSW has strategically facilitated the growth of the community housing sector in recent years, providing a range of capacity building opportunities. NSW government now has the opportunity to benefit from this increased capacity."*

Furthermore, the Taskforce said that inclusionary zoning policies do not work to provide affordable housing in all markets. While these policies provide a level of certainty about the type of contribution required for

affordable housing and avoid the need for site based negotiation processes and the mandatory nature of the provisions support the delivery of scale, they have been shown to work most effectively in very high value land locations and have limited application in lower cost markets.

Inclusionary zoning provisions may be considered to increase the costs of development which may be passed on to individual home purchasers. The application of such policy is complicated and can lead to a lowering of dwelling supply and an increase in market costs as suppliers seek to pass on the inclusion cost by raising general market prices or lowering delivery costs or both which can lead to lower supply and higher costs thus exacerbating the affordability problem.

6.1.3 Housing Affordability Report to the Premier

In 2017 the Governor of the Reserve Bank of Australia (RBA) Mr Glenn Stevens AC was asked by the Premier of NSW to provide a Report to the Premier of NSW on the issue of Housing Affordability including any recommendations that he advised should be implemented into the NSW Planning system. It is noted that report and recommendations were accepted by the NSW Government.

On the challenge of affordability Mr Stevens noted:

“Certainly, if our objective is housing being “affordable” in an environment of growth in population and income, we need to have the market clearing at lower prices for dwellings. This means we need to have the supply side able to respond to demand in a more elastic way. The only alternative would be to find other, non-price, ways of rationing demand. Tempting as these might be at times, they are likely to have serious unintended consequences. Even if they did not, suppressing demand at any given price level is surely inferior to meeting genuine demand through higher productivity.”

Stevens progresses to state that Sydney has attributes and challenges that work against affordability.

“So if government is serious about tackling the issues at the heart of the ‘affordability’ problem, and not just responding to symptoms, it needs a plan for growth. It also needs to articulate to a sometimes-sceptical populace – those who are already here - what we need to do to accommodate more people, why growth without a plan is a not a good outcome but also why an even worse outcome would be stagnation. After all, houses tend to be quite affordable in locations that are declining - because people don’t want to live there.”

“To be sure, Sydney has geographical challenges that some other capitals do not. But it is worth asking the question why land has to be so expensive. Are there artificial constraints to land supply that may be exacerbating this problem? The costs are compounded by unwillingness to contemplate smaller lot sizes, in contrast to some other cities. If land is genuinely scarce, then we need to be prepared to use it more efficiently.”

This SCC application in using the planning systems policy for a change in land use and more efficient assessment systems that seeks to supply increases of density in an area where people want to live assists directly to provide a scheme that is responding to the challenges of affordability.

6.1.4 Development Under the Housing SEPP

The proposed development would be facilitated by the provisions of the Housing SEPP. The Housing SEPP requires that 50 per cent of the units in a development are rented as affordable housing by a community housing provider for no less than 15 years (which allows for asset recycling). Under the proposed scheme, 160 apartments would be leased and managed by Pacific Community Housing.

The Housing SEPP gives the state and council the opportunity to work with a community housing provider to get an affordable outcome that provides housing choice and access for housing singles, families and couples. Specifically, the Canterbury-Bankstown Local Strategic Planning Statement observes:

“The Sydenham to Bankstown Metro corridor has been identified by the NSW Government as a location for new housing. We will aim to maintain the character of these areas and plan to develop adjoining and surrounding lands and sites, including high-density development. We will work with the NSW Government on a high-level principles-based strategy and place plans for each centre in consultation with the community. Greatest growth will be planned for the centres of Canterbury, Campsie, Belmore, and Lakemba, with more modest growth in Punchbowl, Wiley Park and Hurlstone Park.”

The subject site is underutilised in its locational context within the Campsie town centre and near the Campsie train station, which connects the site to other centres and the Sydney CBD.

This application has demonstrated that the development will avoid any perceived land use conflict, is a logical residential development, and enables the capture of the increased permissibility gains to be deliberately and directly applied to support the provision of affordable housing in an unaffordable area for low and very low-income families.

6.1.5 Objectives of the EP&A Act

When performing functions under the Act, authorities will be guided by three additional new objects promoting:

- good design and amenity of the built environment
- the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)
- the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants.
- to promote the delivery and maintenance of affordable housing

The new objects of the Act commenced from 1 March 2018.

The objects of the Act are guiding principles that need to be considered by planning authorities, such as councils and Local Planning Panels, when making decisions under the Act.

According to the Department's own explanatory notes guiding how the new objects are to be interpreted, *"promoting social equity through the provision of Affordable Housing and directly dealing with the issues of housing stress in Sydney is already a relevant consideration that may be considered by decision-makers."*

The explanation goes on to highlight the increased importance of affordable housing as a consideration: *"Having an affordable housing object elevates the importance of promoting and facilitating the provision of Affordable Housing as part of the planning system as a whole and will ensure that affordable housing provision is considered and balanced with the other objects of the Act."*

As noted earlier, the Affordable Housing Taskforce report that was released in 2012, provides further evidence analysis of the need for the planning system to support the delivery of Affordable Housing.

It is clear that, the new Housing SEPP 2021 seeks to implement a critical key objective of the Act. Therefore, it can be seen that there is a deliberate planning approach applied about the practical application of the objectives of the Act and the use of an EPI to achieve the objective.

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7 Conclusion

This report supports an application to the NSW DP&E for a SCC under Division 5 Part 2 of the Housing SEPP 2021. The subject site is at 124-142 Beamish Street and 16-18 Ninth Avenue, Campsie.

The SCC supports the development of the site which will facilitate 320 dwellings, of which 50% (160 dwellings) will be designated affordable housing units, managed by Pacific Community Housing, for a period of 15 years in accordance with the provisions of the Housing SEPP.

The subject site is zoned B2 Local Centre within which development for the purpose of '*residential accommodation*' is prohibited, which includes '*residential flat buildings*'. Further, the site is approximately 150 metres from the entrance to the Campsie train station and is therefore within the 800 metres requirement and as per Section 36(1)(a) of Division 5 of Part 2 of the Housing SEPP.

Due to the high unmet demand for affordable housing in Campsie and the Canterbury Bankstown LGA more generally, the site at 124-142 Beamish Street and 16-18 Ninth Avenue, Campsie offers a real opportunity in a suitable/compatible location to support the provision of affordable housing. The subject site is underutilised in its locational context near a train station entrance that connects the site to a number of centres within a short time, directly achieving the aims and objectives of the strategic planning framework, including the Greater Sydney Plan, South City District Plan, the Canterbury Bankstown Local Strategic Planning Statement and the draft Campsie Town Centre Master Plan

As discussed in this report, the purpose of the Housing SEPP is to incentivise the supply of affordable and diverse housing in the right places and for every stage of life. This application demonstrates that proposed residential flat development at the height and density proposed will not have any unacceptable environmental impact and is compatible with the surrounding land uses having regard to existing and approved land uses and the bulk and scale and the preferred future land uses on land surrounding the subject site.