



CAMPBELLTOWN
CITY COUNCIL

EXTRAORDINARY BUSINESS PAPER

29 SEPTEMBER 2020

COMMON ABBREVIATIONS

AEP	Annual Exceedence Probability
AHD	Australian Height Datum
BASIX	Building Sustainability Index Scheme
BCA	Building Code of Australia
BIC	Building Information Certificate
BPB	Buildings Professionals Board
CLEP 2002	Campbelltown Local Environmental Plan 2002
CLEP 2015	Campbelltown Local Environmental Plan 2015
CBD	Central Business District
CPTED	Crime Prevention Through Environmental Design
CSG	Coal Seam Gas
DA	Development Application
DCP	Development Control Plan
DDA	<i>Disability Discrimination Act 1992</i>
DPE	Department of Planning and Environment
EIS	Environmental Impact Statement
EPA Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	Environmental Protection Authority
EPI	Environmental Planning Instrument
FPL	Flood Planning Level
FFTF	Fit for the Future
FSR	Floor Space Ratio
GRCCC	Georges River Combined Councils Committee
GSC	Greater Sydney Commission
HIS	Heritage Impact Statement
IDO	Interim Development Order
IPR	Integrated Planning and Reporting
KPoM	Koala Plan of Management
LEC	Land and Environment Court
LEC Act	<i>Land and Environment Court Act 1979</i>
LEP	Local Environmental Plan
LGA	Local Government Area
LG Act	<i>Local Government Act 1993</i>
LPP	Local Planning Panel
LTFP	Long Term Financial Plan
NGAA	National Growth Areas Alliance
NOPO	Notice of Proposed Order
NSWH	NSW Housing
OEH	Office of Environment and Heritage
OLG	Office of Local Government, Department of Premier and Cabinet
OSD	On-Site Detention
OWMS	Onsite Wastewater Management System
PCA	Principal Certifying Authority
PoM	Plan of Management
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
PMF	Probable Maximum Flood
PN	Penalty Notice
PP	Planning Proposal
PPR	Planning Proposal Request
REF	Review of Environmental Factors
REP	Regional Environment Plan
RFS	NSW Rural Fire Service
RL	Reduced Levels
RMS	Roads and Maritime Services
SANSW	Subsidence Advisory NSW
SEE	Statement of Environmental Effects
SEPP	State Environmental Planning Policy
SREP	Sydney Regional Environmental Plan
SSD	State Significant Development
STP	Sewerage Treatment Plant
SWCPP	Sydney Western City Planning Panel (District Planning Panel)
TCP	Traffic Control Plan
TMP	Traffic Management Plan
TNSW	Transport for NSW
VMP	Vegetation Management Plan
VPA	Voluntary Planning Agreement
PLANNING CERTIFICATE	– A Certificate setting out the Planning Rules that apply to a property (formerly Section 149 Certificate)
SECTION 603 CERTIFICATE	- Certificate as to Rates and Charges outstanding on a property
SECTION 73 CERTIFICATE	- Certificate from Sydney Water regarding Subdivision



22 September 2020

You are hereby notified that the next Extraordinary Council Meeting will be held at the Civic Centre, Campbelltown on Tuesday 29 September 2020 at 6.30pm.

Lindy Deitz
General Manager

Agenda Summary

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1. ACKNOWLEDGEMENT OF LAND

I'll acknowledge the Dharawal people whose ongoing connection and traditions have nurtured and continue to nurture this land.

I pay my respects and acknowledge the wisdom of the Elders – past, present and emerging and acknowledge all Aboriginal people here tonight.

2. APOLOGIES/ LEAVE OF ABSENCE

3. DECLARATIONS OF INTEREST

Pecuniary Interests

Non Pecuniary – Significant Interests

Non Pecuniary – Less than Significant Interests

Other Disclosures

4. REPORTS FROM OFFICERS

4.1 Draft Local Housing Strategy - Public Exhibition

Reporting Officer

Executive Manager Urban Centres
City Development

Community Strategic Plan

Objective	Strategy
4 Outcome Four: A Successful City	4.3 - Responsibly manage growth and development, with respect for the environment, heritage and character of our city

Officer's Recommendation

1. That the updated draft Campbelltown Local Housing Strategy (attachment 1) be endorsed by Council and forwarded to the Department of Planning, Industry and Environment for endorsement.
2. That all persons/groups making a submission during the exhibition of the draft Campbelltown Local Housing Strategy be advised of Council's decision.

Executive Summary

The preparation of the draft Campbelltown Local Housing Strategy (draft LHS) has been undertaken in accordance with the Western City District Plan (WCDP) and Campbelltown Local Strategic Planning Statement (LSPS) to guide future local and regional decisions on housing provision and growth in the Campbelltown Local Government Area.

Council has received funding under the Western Sydney City Deal to conduct an accelerated review of the Campbelltown Local Environmental Plan 2015 (CLEP 2015). As part of the CLEP 2015 review funding process, the draft LHS is required to be approved by Council and referred to the Department of Planning, Industry and Environment for endorsement by 30 September 2020.

At its meeting on 11 August 2020, Campbelltown City Council considered a report on the draft LHS and resolved as follows:

1. That the draft Campbelltown Local Housing Strategy be endorsed and placed on public exhibition for a period of 28 days.
2. That the outcome of the exhibition of the draft Campbelltown Local Housing Strategy be reported back to Council.

The draft LHS was publicly exhibited from 12 August 2020 to 9 September 2020 in accordance with the above resolution of Council. Thirteen submissions were received during the public exhibition period, either expressing broad support, or seeking specified changes to the draft LHS.

All submissions received by Council during the exhibition period have been considered as outlined in this report, and in response a number of minor amendments are proposed to the exhibited draft LHS for Council's consideration and endorsement.

It is recommended that the updated draft LHS be endorsed by Council and forwarded to the Department of Planning, Industry and Environment for endorsement.

Purpose

The purpose of this report is to:

- Review the submissions received during the public exhibition of the draft LHS
- Outline the amendments undertaken to the draft LHS in response to those submissions
- Seek Council's approval to forward the amended draft LHS to the Department of Planning Infrastructure and Environment for finalisation.

History

The WCDP requires local housing strategies to be prepared by Councils in the Western City District. The approval of the Campbelltown LSPS by the Greater Sydney Commission, which came into effect on 31 March 2020, was an important first step in the broader LEP review process and has informed the preparation of the draft LHS.

The preparation of the draft LHS (attachment 1) complies with the Campbelltown LSPS and forms part of the broader review of Campbelltown Local Environmental Plan 2015 (CLEP 2015). As part of the LEP review funding process, the draft Strategy is required to be approved by Council and referred to the Department of Planning, Industry and Environment for endorsement by 30 September 2020.

In order to have effect, the draft LHS must be endorsed by both Council and the Department of Planning, Industry and Environment. Thereafter, future planning proposals and policy actions relating to housing provision in the LGA will need to align with the final Campbelltown Local Housing Strategy.

At its meeting of 11 August 2020, Council considered a comprehensive report on the draft LHS and resolved as follows:

1. That the draft Campbelltown Local Housing Strategy (attachment 1) be endorsed and placed on public exhibition for a period of 28 days.
2. That the outcome of the exhibition of the draft Campbelltown Local Housing Strategy be reported back to Council.

The following report outlines the public exhibition process undertaken by Council in accordance with the above resolution.

Report

Introduction

The Campbelltown Local Housing Strategy (LHS) is a housing review undertaken at local government level and prepared in accordance with Sydney regional and district planning framework, and the specific actions of the Campbelltown LSPS.

The draft LHS is an evidence based document setting out relevant priorities and actions to deliver suitable and diverse housing growth to meet the needs of the Campbelltown community over the next 20 years. The draft LHS considers housing delivery outcomes that respect local amenity and character, open space and ecological values, and align with infrastructure provision.

The key objectives of the draft LHS are to:

- a) Provide an evidence based assessment of the supply and demand of housing in the Campbelltown LGA, including consideration of demographic factors, housing trends, local land use opportunities and constraints, and infrastructure limitations.
- b) Identify and respond to the constraints and opportunities for the delivery of new housing in the Campbelltown LGA having regard to the requirements of the Greater Sydney Region Plan and the WCDP.
- c) Promote the efficient use of land and infrastructure by aligning housing growth with supporting infrastructure and social services, such as schools, health facilities and public transport.
- d) Comply with the requirements of the Department of Planning, Industry and Environment's (DPIE) Local Housing Strategy Guidelines.

As outlined in the report to Council of 11 August 2020, the drafting of the LHS included consideration of community feedback from the LSPS, concurrent work undertaken on the draft Campbelltown Employment Lands Strategy, and early consultation undertaken with key community groups and stakeholders in the LGA.

The draft LHS has been prepared by Council with assistance by planning consultants Hill PDA, engaged by Council through an open tender process in early 2020. The engagement of planning consultants was necessary to assist the delivery of this project given the limited in-house resources available to undertake the significant work required to complete this project in the required timeframe.

Post Exhibition Review

The draft LHS was publically exhibited from 12 August 2020 until 9 September 2020 in accordance with the Council report and resolution of 11 August 2020.

Exhibition material was made publicly available in electronic form on Council's website, and notification provided to proponents of current planning proposals, key housing and community groups, and those persons/groups who had registered an interest in the preparation of a housing strategy under Campbelltown LSPS exhibition process.

During the public exhibition period, 13 submissions on the draft LHS were received. Council officers also fielded several phone calls during the exhibition period, assisting residents and stakeholders with their enquiries.

Copies of all submissions are provided as an attachment to this report. Discussion of the key issues outlined in each submission is provided below, including an outline of revisions undertaken to the draft LHS where considered appropriate.

Submission from the Macarthur Women's Domestic Violence Court Advocacy Service

Macarthur Women's Domestic Violence Court Advocacy Service (MWDVCAS) has expressed concern that the LHS does not consider the impacts of domestic and family violence on housing. The Service is experiencing strong and increasing demand as domestic and family violence is a significant issue in the Campbelltown LGA and Macarthur region. The most recent Bureau of Crime Statistics report (June 2020) showed that in relation to Breach ADVO (Apprehended Domestic Violence Orders) the Campbelltown Police Area Command (PAC) had over a two year trend an increase of 19.3 percent. Accommodation is therefore a big issue for the service and housing is almost a daily issue for the key domestic and family violence service providers in the area. The service advocates that enabling women to find affordable accommodation allows them to focus on other needs such as employment, further education, wellbeing – both psychological and physical health, and supporting their children.

Response

The work undertaken for the draft LHS focuses on broader housing supply and demand issues in accordance with the WCDP and LSPS. In this respect, it is acknowledged that further work will need to be undertaken to examine and address housing issues relating to domestic and family violence.

The Campbelltown community includes some demographics with high levels of need for crisis accommodation, and for this purpose the draft LHS recommends increasing the supply of affordable rental housing to address the growing needs of those with high support needs, as well as workers on low to moderate income levels. These housing issues are to be examined as part of consideration by Council of a potential stand-alone Affordable Rental Housing Strategy (ARHS) for the Campbelltown LGA. The development of a Campbelltown ARHS would include a strong social sector engagement piece in order to pick up on the points that MWDVCAS is making.

To better address the issues raised by MWDVCAS, the draft LHS has been amended by inserting a new section 5.2.8 that specifically relates to housing for victims of domestic violence and sections 5.2.9 and 5.2.10 have been amended to specifically refer to those escaping domestic and family violence as a group with specific housing needs including access to affordable rental housing.

Submission from Macarthur Legal Service

A feed-back form was submitted which expressed a succinct concern that the draft LHS does not consider domestic violence issues.

Response

As noted above, the LHS has been amended by inserting a new section 5.2.8 that specifically relates to housing for victims of domestic violence and sections 5.2.9 and 5.2.10 have been amended to specifically refer to those escaping domestic and family violence as a group with specific housing needs including access to affordable rental housing.

Submission from Resident (1)

A submission from a resident and local disability advocate, expressed strong support for the recommendations in the LHS that relate to accessible housing. The submission articulated a view that more emphasis could be given to providing more group homes for those with disability, as this may be more suitable for some clients than public housing. Providing purpose-built housing that can be used for independent supported living arrangements allows a person with a disability to live independently from their parent/carer and thus develop important skills for future independence with external support. The submission also expressed a desire for the standard of public housing to be improved and for public housing to be distributed throughout the community, rather than clumped together to reduce stigma, similar to the redevelopment of Minto Social Housing Estate.

Response

The draft LHS recommends a strengthening of DCP provisions to encourage more housing that is suited to independent living by people with a disability. Group homes are currently permitted in R2 Low Density Residential, R3 Medium Density residential, R4 High Density Residential and B4 Mixed Use zones and this is considered appropriate. While acknowledging the comments in relation to social housing, the ability of Council to influence social housing outcomes is limited, as social housing is provided by the NSW Government. Additional information has been inserted into section 5.1.4 of the draft LHS to reflect current commitments of the NSW Government under the Communities First program to renew social housing estates in Airds-Bradbury, Rosemeadow and Claymore. A new Action 4.8 has been inserted into section 9.1.4 of the draft LHS to encourage Council to continue to advocate for improved social housing outcomes through the renewal of estates and delivery of new social housing in locations with access to jobs and services.

Submission from Resident (2)

A submission from a local resident via the online feedback form indicated support for the draft LHS including the growth of Campbelltown. The submitter expressed concern at the ability of Council to undertake timely assessment of development applications once the projected growth occurs.

Response

The draft LHS discusses the need to manage growth efficiently. A new item has been added to action 3.1 in section 9.1.3 to encourage Council to monitor Council's resourcing needs to process development applications in a timely manner.

Submission from Resident (3)

The submitter expressed support for the draft LHS, particularly for the encouragement of higher density housing around rail stations including around both sides of Campbelltown, Macarthur and Leumeah Stations to form the CBD. Large car parking in each of these areas occupy valuable accessible sites for housing/commercial and these areas should be re-evaluated as sites for potential housing and development contributions considered for reconstruction as underground or multilevel parking. Provision for planning of these major future facilities (entertainment, civic, cultural, sporting etc) and transport linkages to reduce car dependency (pedestrian, cycleways and public transport) should begin now not when constraints which occur with short term opportunities, make such provision far more difficult and expensive.

Response

The support is noted. The draft LHS suggests the preparation of precinct Masterplans as a way to plan for infrastructure delivery to be aligned with housing delivery.

Submission from the Hon Member for Macquarie Fields

A detailed submission from Hon. Anoulack Chanthivong MP raises a significant number of issues. Details of each issue and a corresponding response is provided in the table below.

Issue raised	Response
Concern is expressed regarding political motivations and process for preparing the LHS: "I understand the LHS is based on housing targets and mandates set by the NSW Liberal Government. However, I would expect Council and Councillors to stand up for what's best for our local community, not simply rubber stamp over development plans."	The exhibited draft LHS responds to the requirements of the GSC and NSW Government requirements. It presents a comprehensive evidence base to inform Council's decision making. The draft LHS does not adopt the Housing Targets put forward by the Greater Sydney Commission. Instead it proposes different housing targets that will need to be discussed and negotiated with the Department of Planning Industry and Environment (DPIE).
Concern is expressed that Council is adopting the housing targets set by GSC/state government without question.	The exhibited draft LHS responds to the requirements of the GSC and the NSW Government requirements and proposes a lower housing target for the LGA than the one put forward by GSC.
The submission raised objections to over-development and associated problems such as traffic caused by additional density and loss of urban character.	The draft LHS is a 20 year plan. It advocates for different housing targets than those put forward by GSC. It also promotes infrastructure delivery aligned with population and housing growth. New development is encouraged near train stations to minimise traffic impacts. Large areas for the LGA are to be retained for low density residential development to maintain the current character of many suburbs. Areas outside of the urban footprint and designated growth areas are to be protected.

Suggest the LHS should detail specific items of supporting infrastructure needed to accommodate the state government's housing target.	The draft LHS is a 20 year plan. It advocates for lower housing targets than those put forward by GSC. It proposes incremental planning for areas to undergo change including strategies to plan for and fund infrastructure.
The "planned infrastructure" listed in section 8.4 of the LHS is inadequate.	The infrastructure items listed in section 8.4 are items currently in the planning processes. Further infrastructure will be needed beyond that which is currently in the planning stage. The draft LHS suggests at section 8.5.3 that Council prepare a costed infrastructure plan for each renewal and greenfield area to ensure that housing delivery is matched with investment in infrastructure.
Supports Council's commitment to limiting residential growth to the current and planned urban area.	Support noted.
Concern that level of growth predicted in the LHS will inevitably impact on the character of the LGA. Concern the high rise development along the rail line juxtaposed with the rural lands nearby will change the character.	Concern noted. Growth will occur with or without the draft LHS. The draft LHS puts forward a strategy to manage growth to deliver good housing outcomes for the LGA while preserving the important rural setting.
Notes that the community survey indicates that residents value suburban character not high density.	In response to the community's support for existing suburban character, the draft LHS supports the retention of the existing suburban character in all urban areas excluding the urban renewal corridor.
The submission questioned what is meant by self-reliant in the context of 'new housing will support a self-reliant growing population and be strategically located to support business and employment in commercial centres' [pg 11].	The draft LHS supports housing growth close to jobs and Council is encouraging jobs growth so that fewer people have to travel outside the LGA for work. The draft LHS and LSPS encourage the needs of the population to be met locally, rather than relying on jobs and services in other LGA's.
How does council define 'liveable' and 'high amenity'? "New housing will contribute to liveable neighbourhoods that encourage the community to interact in a walkable, high amenity and urban environment" [pg 11].	A liveable neighbourhood is one which is a great place to live in. Amenity refers to how pleasant a place is.
What is meant by 'healthy urban design' "support the health and wellbeing through healthy urban design and inclusive design" [pg 66].	Healthy urban design is a planning concept. It means putting the needs of people and communities at the heart of the urban planning process and considering the implications of decisions for human health and well-being. ¹
What is the status of the employment lands strategy? [pg 66] Requests a comprehensive job strategy.	A Strategic Review of Employment Lands Strategy was considered by Council at its meeting on 8 September, 2020 and will be placed on public exhibition in the near future.

¹ <https://www.euro.who.int/en/health-topics/environment-and-health/urban-health/activities/healthy-urban-design>

Concern that the LHS supports the growth along the rail corridor but the railway line is specifically identified as a constraint to development due to noise "the railway line can limit residential use due to noise impacts. Residential lands should not be planned in locations where [sic] mechanical ventilation is required to meet noise standards" [pg 67].	Noise from the rail line is a constraint that will need to be considered when planning for the urban renewal areas. Locating housing near rail stations is common practice internationally because it provides convenient access to jobs and services. The typographical error has been corrected.
Concern the values the community noted in the survey will be negatively impacted by the densification.	In response to the community's support for existing suburban character, the LHS supports the retention of the existing suburban character in all urban areas excluding the urban renewal corridor.
Concern that private open space is highly valued and not available for high-rise buildings.	Planning for public and private open space is a key consideration in planning for urban renewal areas. The draft LHS acknowledges the need for detailed masterplans be prepared for each renewal area to ensure that adequate open space is delivered and appropriate lands are reserved and protected from development.
The majority of the LHS directly contravenes the views of the community regarding density [pg 142] 'how can council justify the development plans suggested in the LHS when the community has made it clear high-density living is not what they want in the LGA?'	In response to the community's support for existing suburban character, the draft LHS supports the retention of the existing suburban character in all established residential areas excluding the urban renewal corridor. Focussing housing growth in locations already identified for growth will allow other parts of the LGA to remain low density.
What is meant by the observation "design controls for the CBD area do not appear to align with market conditions"? in what way do the design controls not align with market conditions?	The report has been amended clarify this matter, that recent development has not achieved the maximum height limit.
Concern regarding suggested reduction in parking requirements for development proposals and lack of car share schemes.	Parking reductions are put forward as one of a number of options to reduce costs and provide more affordable housing. Any proposals for reduced parking would need to be considered by Council as part of the development assessment process. While shared car schemes are not currently available in the LGA, they are available in many other parts of Greater Sydney and are likely to become available within the 20 year timeframe of the draft LHS.
Concern the suggested action that floor space could be negotiated as part of voluntary planning agreements in the CBD would result in developers expecting the same treatment throughout the LGA.	Negotiated floorspace through a VPA in return for affordable rental housing has been successfully implemented in other parts of Greater Sydney. It is put forward as one of several options available to Council. Council can control the circumstances in which it would be willing to enter into such arrangements in a Voluntary Planning Agreement Policy.

Concern regarding the lack of local character statements prior to the LHS that were reported to Council to be prepared in 2018.	In 2019 the then Department of Planning and Environment released a discussion paper on Local Character overlays. It proposed an amendment to the Standard Instrument LEP to enable Council's to prepare local character overlays. That amendment has not yet been made. There are potential benefits to local character statements for particular locations and their preparation remains an action (action 1.35) for Council under the LSPS.
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Submission on behalf of land owner near Campbelltown CBD

A submission was received from BBC Consulting Planners on behalf of the Campbelltown Central 2 Pty Ltd and Campbelltown Central 8 Pty Ltd who are the respective owners of No. 2 and 8 Farrow Road, Campbelltown. A request for a planning proposal is before Council for No. 2 Farrow Road. Both of these properties are within the 'deferred matter' area to the west of Campbelltown station.

A key part of the submission is that the Glenfield to Macarthur Corridor Strategy, in its Campbelltown Precinct Plan, nominates the land owners property as future high rise residential (7 storeys and over). The State Government's position is to be enforced through Ministerial 9.1 Direction 7.7 which states that "development within the precincts between Glenfield and Macarthur is consistent with the plans for their precincts." This issue is detailed in section 2.1.5 of the draft LHS.

The submission claims that the draft LHS fails to implement the relevant NSW Government strategy for the Campbelltown Precinct, as it refers to subsequent planning work by Council in the Reimagining Campbelltown Masterplan. The submission also suggests that the Hill PDA diagram (Figure 61) entitled "Lots with development potential in Campbelltown" is incorrect as it identifies only two locations in Campbelltown as containing lots with development potential.

Response

The draft LHS makes no specific recommendations in relation to the "deferred matter" areas. Consistent with the submission, the draft LHS correctly states the Ministerial Direction requires planning proposals in the Glenfield to Macarthur corridor to align with the State Government's precinct plans. The draft LHS articulates that Council is working on a new vision for Campbelltown as set out in the Reimagining Campbelltown City Centre Masterplan. The planning framework for implementing Reimagining Campbelltown is yet to be prepared. For this reason, the draft LHS has considered housing needs overall in Campbelltown CBD rather than looking at the potential of the deferred matter area. The draft LHS makes no specific recommendations for the "deferred matter" area. Amendments have been made to section 8.4.2 of the draft LHS to make clear that the comments therein refer to Campbelltown CBD in general and are not specifically directed to the deferred matter area.

The statement in the submission that Figure 61 identifies only two locations in Campbelltown as containing lots with development potential is not correct. There are many lots with development potential shown on the map as is indicated by the lots shaded light grey through to dark blue. Additional text has been inserted into the draft LHS to assist interpretation of this and similar maps. A footnote has been added to Figure 61 to make clear that the deferred matter area was excluded from the analysis.

NSW Education – School Infrastructure (SINSW)

The submission by SINSW identifies the potential impacts to multiple schools affected by planned population growth within the Campbelltown LGA, and requests that consultation between SINSW and Council occurs before the finalisation of future strategic directions and planning proposals that propose higher density residential development within the Campbelltown LGA. This is to ensure appropriate resourcing is provided for public schools to respond to all new population projections.

SINSW is supportive of various actions that deliver increased use of public transport opportunities, including measures such as upgraded pedestrian links to bus stops for school students, traffic calming measures around schools, and higher bus priority on roads to decrease bus journey times. SINSW is also supportive of updating the local contributions framework, though recommends a number of matters be considered including an exemption for public schools and collection of contributions to support future public school upgrades.

Response

The NSW government has responsibility for identifying government agency consultation requirements in regards to planning proposals. Where the Gateway determination for a planning proposal to increase population density requires consultation with either SINSW or the Department of Education it will be undertaken. There are no proposed changes in the draft LHS to the continuation of this consultation process.

The recommendations for improved urban design outcomes to support accessibility to bus services for the community is generally supported through the accessibility objectives of the draft LHS encouraging sustainable population growth in proximity to public transport services. The suggestions by SINSW regarding road and pathway design are appropriately addressed for new housing developments through the Campbelltown (Sustainable City) Development Control Plan, 2015.

In response to the infrastructure related comments, Council has already prepared, exhibited and adopted the Campbelltown Local Infrastructure Plan 2018, as a City Wide contribution plan to cater for the anticipated growth for the 15 year period 2018-2033. The Work Schedule for the Plan contains numerous infrastructure items associated with Public Domain, albeit focussed on the town centres, traffic and transport infrastructure and numerous cycleways. Under this Plan, any applications associated with NSW Government schools are already exempt from payment of contributions.

The NSW Department of Education also have funding options through the annual State Infrastructure Contributions program for some of the facilities listed, in addition to future SIC contributions planned for the Glenfield to Macarthur growth corridor.

Submission from the Salvation Army - Australia

A detailed submission by the Salvation Army (SA) expresses support for the Strategy outcomes and the implementation of actions under all 10 of the Housing Objectives provided in section 8.1 of the draft LHS. In particular, the SA support the provision of affordable housing, accessibility and inclusive housing design, and higher density and mixed use development within walkable distance to train stations.

Support is also expressed for the reinvigoration of the town centres as provided in the Glenfield to Macarthur Urban Renewal Corridor precinct plans, with the appropriate provision of social services, affordable and social housing. SA supports the implementation of the draft LHS to ensure appropriate and timed actions with a planning framework that delivers the correct resources and appropriate allocations and accountability.

The SA question why their property at 27-31 Rudd Rd, Leumeah is not identified in Figure 67 of the draft LHS as it provides significant opportunity for housing provision, as identified in the NSW Governments Vision.

Response

The support of the SA is noted and welcomed. The properties shown on Figure 67 excludes land owned by non-government organisations and/or used for social infrastructure. In response to the SA's submission, the figure has been amended to show their property at 27-31 Rudd Rd, Leumeah.

Submission from Lend Lease

A submission was received from Lend Lease who manage Macarthur Square on behalf of the owners of the Centre, GPT Wholesale Shopping Centre Fund and Australian Prime Property Fund Retail (the Owners). Lend Lease support the draft LHS as the logical extension of Council's Reimagining Campbelltown vision.

Lend Lease advise that Macarthur Square has significant growth potential being located within an established centre and having capacity to integrate high density residential on the site would act as the catalyst to transform Macarthur Square into a truly 24/7 mixed use centre and ensure that commercial and retail uses remain viable. Lend Lease believe that residential uses will form an important part of delivery of this mixed use development including the diversification and expansion of services offered and the integration of complementary non-retail uses including offices, health care, aged care, retail and innovation, and education. They encourage a flexible approach to land use planning will ensure Lend Lease can better respond to, and assist in, achieving growth targets and projections identified in the draft LHS. They recommended that Council consider the cumulative impact of infrastructure levies and value capture mechanisms on the future development potential of sites, and the ability for Council to achieve the strategic objectives and housing targets of the draft LHS.

Response

Lend Lease's support for the draft LHS is noted. The draft LHS has been amended in section 8.7 and 9.1.5 to reflect the issues raised by Lend Lease regarding the testing of the cumulative impact of infrastructure levies and value capture mechanisms on the future development potential of sites, and the ability to achieve the strategic objectives and housing targets.

Submission from WaterNSW

A submission from WaterNSW expresses interest in the draft LHS because the new housing stock required to accommodate Campbelltown's growing population will be accommodated in areas in proximity to the Upper Canal Corridor. WaterNSW indicate that it is important that new housing development be set back from the Corridor and buffered by public open space, perimeter roads or road reserve. The Upper Canal Corridor is a Controlled Area declared under the *Water NSW Act 2014* and Water NSW Regulation 2020, and public access is prohibited. Further about 1170ha of the Campbelltown LGA also overlaps with the Sydney Drinking Water Catchment including part of the Woronora Special Area and Lake Woronora water storage area in the south-east of the LGA which are owned and managed by WaterNSW.

WaterNSW has suggested that the list of planning proposals in Table 14 of the draft LHS is not current. They also question the dwelling capacity stated in Table 33. They suggest that additional maps be inserted to show the location of Gilead and Menangle Park and that the upper canal corridor be displayed on the maps. Lot yield projections for Gilead may need to be revised given the recent 28 August 2020 listing of the Mount Gilead Estate on the State Heritage Register.

Response

The upper canal traverses land designated for future green-field residential development within the Greater Macarthur Priority Growth Area. Any future planning proposals and development applications within this area will need to address the potential impacts of new residential development on the Upper Canal corridor as raised by WaterNSW.

In response to the broader matters raised by WaterNSW, the draft LHS has been amended in sections 3.6.6 and 3.7 to refer to the Woronora Special Area and the Upper Canal. The planning proposals listed in Table 14 have been updated to incorporate new planning proposals since the draft LHS was prepared and to reflect the current status of the planning proposals on 15 September 2020. The dwelling capacity provided in Table 33 is consistent with the LSPS. It is anticipated that the dwelling potential will be revised as planning proceeds for each of the greenfield and urban renewal areas.

Submission on behalf of Macarthur Grange Golf Course

The submission prepared on behalf of Macarthur Grange Golf Course makes reference to a planning proposal before Council for their Golf Course site which was lodged with Council in June 2020, seeking to achieve a rural living concept comprises approximately 63 environmental living lots ranging from 0.5 to 2.75ha (1.3ha average lot size) and a 6ha lot fronting Raby Road for recreation, entertainment, and community uses including the existing club house. The proposal is considered by the submitter to be consistent with the core values of the Scenic Hills.

The submission suggests that the draft LHS should recognise the need for a long term land use and management arrangement for privately held land in the Scenic Hills. The submitter requests that the LSPS be amended to acknowledge the need for a long term management arrangement for private landholdings in the Scenic Hills, and to outline the key principles which may inform this approach. Further, that consider action should be given to the role that limited rural residential / environmental living housing can play in enhancing the diversity of housing within the area whilst supporting the ongoing protection of the visual, ecological and rural values of the Scenic Hills.

Response

The draft LHS responds to and is consistent with the Local Strategic Planning Statement in regards to these issues. Amendments have been made to page 15 of the draft LHS to reflect the need for additional housing that offers lifestyle choice including some large lot housing to meet the anticipated medium to long term growth in jobs for professionals associated with the implementation of Reimaging Campbelltown.

The LSPS has been finalised and adopted by Council and no further revisions regarding actions to protect the Scenic Hills are envisaged at this time. Management of private land holdings within the Scenic Hills is beyond the scope of the draft LHS, and may be separately pursued by Council outside of the draft LHS process if warranted.

Submission from Shelter NSW

A submission was received from Shelter NSW with comments generally relating to the delivery of affordable housing outcomes in the Campbelltown LGA, including opportunities to better promote extra housing choice and diversity.

The submission discussed a number of matters for Council to consider in the draft LHS, including delivery of homes that meet the needs of younger residents and deliver alternative housing options for older residents to age in place. This includes more medium density housing within town centres, mixed use development outcomes, and development controls for design outcomes. The submission recommends a number of actions for Council, including consideration of climate change, COVID-19, and Council providing advocacy for the review of State planning policies affecting affordable rental housing outcomes.

Response

The draft LHS has been prepared in close consultation with community groups and supports the increased delivery of affordable rental housing and the delivery of the right housing in the right locations. The draft LHS advocates for greater housing diversity in accessible areas close to services and transport, including opportunities for greater housing choice in the nominated Glenfield to Macarthur urban renewal corridor.

Section 8.7 of the draft LHS provides an analysis of affordable housing issues in the Campbelltown LGA, and provides a number of clear actions for Council's consideration to improve delivery of affordable housing outcomes. These actions include the preparation a stand-alone affordable rental housing policy for Campbelltown, and continuing work with the Western City Planning Partnership to collectively examine affordable rental housing demand, gap and cost analysis in the Western City District.

The draft LHS promotes environmental conservation through containment of urban growth, and promotes energy efficient and accessible housing outcomes to improve housing choice. The draft LHS acknowledges differences in dwelling production that may eventuate from the COVID-19 crisis, and this issue will be monitored as required. Importantly however, many of the housing issues raised by Shelter NSW are more relevant to consider in the potential preparation of a stand-alone 'Affordable Rental Housing Strategy' for the Campbelltown LGA, as recommended by the LHS. In this respect, Council staff will continue consultation with Shelter NSW regarding the affordable rental housing issues raised in their submission during this separate process.

Other minor changes

Minor changes have been made to the draft LHS to better recognise Aboriginal cultural heritage throughout the document. Other minor typographical changes have been made to the exhibited document.

Conclusion

The preparation of the draft LHS has been undertaken in accordance with the WCDP and Campbelltown Local Strategic Planning Statement to guide future local and regional decisions on housing provision and growth in the Campbelltown Local Government Area.

The draft LHS is underpinned by evidence-based research and has been informed by early community engagement, and initial targeted consultation with community groups and key stakeholders, including real estate agents, housing groups and social service agencies.

When finalised, the draft LHS will play an important role in informing future LEP and DCP amendments, underpin the preparation of an Affordable Rental Housing Strategy for the LGA, and guide the decision making process of future planning proposals in the LGA relating to the provision of housing.

The draft LHS was publically exhibited from 12 August 2020 until 9 September 2020, and 13 individual submissions were received. In response to these submissions, minor amendments have been undertaken to the LHS as outlined in the body of this report.

As part of the CLEP 2015 review funding process, the draft LHS is required to be approved by Council and referred to the Department of Planning, Industry and Environment for endorsement by 30 September 2020.

It is recommended that Council endorse the updated draft LHS (attachment 1) and forward it to the Department of Planning, Industry and Environment for their endorsement.

Attachments

1. Draft Campbelltown Local Housing Strategy (due to size - 229 pages) (distributed under separate cover)
2. Copy of Submissions (contained within this report)
3. Copy of report to Council 11 August 2020 (contained within this report)



9 September 2020

Ms Lindy Dietz
General Manager
Campbelltown Council
PO Box 57
Campbelltown NSW 2560

Submission to public exhibition of draft Campbelltown Local Housing Strategy

This letter makes submission in response to the draft Campbelltown Local Housing Strategy released in August 2019. The submission relates specifically to a 129ha parcel of land currently used as the Macarthur Grange Golf Course which is located within the Scenic Hills.

On behalf of the landowner, we have prepared a Planning Proposal for the site which seeks to establish a long term land use that is consistent with Council's ambition for the protection of the Scenic Hills landscape unit. The Planning Proposal for this site was lodged with Council in June 2020.

The proposal which has been developed for the Scenic Hills incorporates the following design principles:

- Maintain current balance of open grassy paddock and natural bushland
- Use existing land forms, ridges and gullies to define future property boundaries and access
- Situate built form in lower areas (gullies) but as close to the vegetation as the APZ will allow
- Average lot size to be 1ha to 1.5ha
- Provide scenic public access through the site and to new open space, along with vantage points to key views on higher ground
- Avoid development on gradients of steeper than 1:4 (25%) to minimise earthworks.

The resulting rural living concept comprises approximately 63 environmental living lots ranging from 0.5 to 2.75ha (1.3ha average lot size) and an 6ha lot fronting Raby Road for recreation, entertainment, and community uses including the existing club house. The proposal is characterised by a rural landscape character, retained natural vegetation and scattered buildings that are nestled in the landscape which is considered to be consistent with the core values of the Scenic Hills. This effectively provides for a "green belt" between the urban areas to the east and west.

We have also given consideration how this approach could be applied to the wider Scenic Hills area, through preparation of a high level constraints analysis which is included in the attached urban design report. I am of the view that this approach would provide a long term management arrangement for the golf course site as well as the wider Scenic Hills area and end speculation over future land use options for the area.

I note that the draft Local Housing Strategy maintains Council's long held position on the value of the Scenic Hills and the need to protect this area from significant urban development and to retain its rural landscape character. In this regard it includes an objective to: *To support urban containment, protect the important semi - rural character of the eastern and western flanks of the LGA and respect Campbelltown's scenic hills and East Edge Protection Lands by providing housing within the existing urban area and the Greater Macarthur Priority Growth Areas.*

File Planning and Development Services
PO Box H219, Australia Square NSW 1215

It also includes the following actions which seek to implement this objective:

- *Proposed Action 1.3: Commit to an urban containment policy which seeks to limit future housing growth to the already zoned residential areas.*
- *Proposed Action: 3.2: Enforce the zoning and urban renewal framework by:*
 - *Limiting residential growth to within the existing and planned residential zoned areas of the urban area below the urban growth boundary*
 - *Enabling coordinated development of medium and higher density housing in station precincts based upon a transit - oriented development model*
 - *Prioritising housing growth around Campbelltown CBD and Macarthur.*

Whilst Council's position on the protection of the Scenic Hills is accepted, the draft Strategy does not clearly recognise the need for a long term land use and management arrangement for privately held land in the Scenic Hills. The Council has previously acknowledged the need to provide for some limited development in the Scenic Hills with the Campbelltown Local Planning Strategy 2014 including a future action to: *propose and implement a development model for the Scenic Hills.*

Whilst there may be opportunities for some areas of the Scenic Hills to be transferred to public ownership, there remains the need as a long term sustainable economic use and management regime for these private landholdings to ensure the values of this area are to be preserved.

This position is supported by the Western District Plan which highlights that: *limited growth of rural-residential development could be considered where there are no adverse impacts on the amenity of the local area and the development provides incentives to maintain and enhance the environmental, social and economic values of the Metropolitan Rural Area, including the protection of scenic landscapes.*

It is also noted that a Goal of the draft Strategy is to Increase Housing Diversity. The Strategy does not consider the role that limited rural residential / environmental living housing can play in enhancing the diversity of housing within the area whilst supporting the ongoing protection of the visual, ecological and rural values of the Scenic Hills.

This style of development provides lifestyle choice and a type of housing diversity likely to attract a wider demographic. It will attract those looking for alternative housing to the small lot product presently available in the locality. This typology has shown to be effective at preserving landscape qualities and lifestyle choice in similar locations such as Kirkham, Grasmere and in the North West areas of Dural, Kenthurst, Arcadia.

Accordingly, it is requested that the draft LSPS be amended to:

- **Acknowledge the need for a long term management arrangement for private landholdings in the Scenic Hills, and to outline the key principles which may inform this approach**
- **Consider the role that limited rural residential / environmental living housing can play in enhancing the diversity of housing within the area whilst supporting the ongoing protection of the visual, ecological and rural values of the Scenic Hills.**

Thank you for your consideration of this submission.

Regards,

Michael File
Director
Phone:
E-mail:



8 September 2020

RJC:15-221

The General Manager
Campbelltown City Council
P O Box 57
Campbelltown NSW 2560

Attention: Mr Jeff Burton

council@campbelltown.nsw.gov.au

Dear Mr Burton,

**Re: Draft Campbelltown Local Housing Strategy
2 and 8 Farrow Road, Campbelltown**

We write on behalf of Campbelltown Central 2 Pty Ltd and Campbelltown Central 8 Pty Ltd ("our clients") who are the respective owners of Lot 1 in DP 406940, being 2 Farrow Road, and Lot 116 in DP 1141484, being 8 Farrow Road, Campbelltown ("our clients' properties").

Our clients have asked us to review and provide comment to you on the Draft Campbelltown Local Housing Strategy ("the Draft Housing Strategy") which has been exhibited for public comment.

At page 10, the Draft Housing Strategy states: -

"The Local Housing Strategy will inform future reviews of the Campbelltown Local Environmental Plan 2015 and Campbelltown (Sustainable City) Development Control Plan 2015. It will also guide future planning decisions for the Glenfield to Macarthur Urban Renewal Corridor and greenfield urban release areas"

Our clients' properties are in the Campbelltown Precinct as identified in the Glenfield to Macarthur Urban Renewal Corridor Strategy. That strategy is addressed in Section 2.1.5 of the Draft Housing Strategy. Section 2.1.5 states: -

"The Strategy [i.e. the Glenfield to Macarthur Urban Renewal Corridor Strategy] established a strategic planning framework to guide future development and infrastructure delivery throughout the corridor over the next 20 years".

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EMAIL: bbc.administration@bbcplanners.com.au ~ WEB SITE: www.bbcplanners.com.au

ABN 24 061 868 942

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The relevance of the Glenfield to Macarthur Urban Renewal Corridor Strategy and the Campbelltown Precinct Plan prepared as part of that Strategy to this submission is significant so we have attached pages 29, 30, 31 and 32 in Section 2.15 of the Draft Housing Strategy hereto. Please see **Attachment 1**.

Section 2.1.6 of the Draft Housing Strategy deals with Greater Macarthur 2040. Pages 33 - 36 of the Draft Housing Strategy in which Greater Macarthur 2040 is discussed are provided in **Attachment 2**.

Section 8 of the Draft Housing Strategy is entitled "Housing Framework" and Section 8.4.2 deals specifically with Campbelltown, stating: -

"Reimagining - Campbelltown City Centre Master Plan suggests that to effectively serve the Macarthur region as the metropolitan CBD, it is likely that Campbelltown may ultimately need to accommodate a population in the order of 120,000 to 180,000 people in the City Centre. The Reimagining - Campbelltown City Centre Master Plan has capacity to deliver an additional 15,609 homes across the three centres of Macarthur, Campbelltown and Leumeah by 2040. Significant housing development will be needed to support this population growth.

Housing development will need to contribute to overall liveability and place outcomes for Campbelltown CBD by providing higher density, integrated urban outcomes within a walkable mixed use precinct.

Within the timeframe of this LHS, the Department has identified housing growth potential for 8,250 dwellings for the Campbelltown, Macarthur and Leumeah precincts. In this regard, the land use vision under the Reimagining - Campbelltown City Centre Master Plan provides for higher housing growth near the city centre than envisaged under the Department's Campbelltown Precinct Plan.

Providing high rise buildings close to Campbelltown Station will maximise pedestrian activity and increase trade for local businesses in the Queen Street Commercial Core. A mixture of detached dwellings, townhouses and terraces is envisaged to the east of Lindesay Street to retain the character of that area."

Pages 160-164 of the Draft Housing Strategy are provided in **Attachment 3**. Page 161 reproduces the Campbelltown Precinct Plan on which our clients' properties are identified for High Rise Residential whilst page 163 contains, a Hill PDA diagram (Figure 61) entitled "Lots with development potential in Campbelltown". That diagram identifies only two locations in Campbelltown as containing lots with development potential: those two locations comprise the Campbelltown Mall Shopping Centre and the Campbelltown Catholic Club. Just why these two properties are the only ones in Campbelltown which are identified as having "development potential" is not explained.

This is odd on two counts: -

- firstly, as shown on page 161 of the Draft Housing Strategy, our clients' lands, and other adjoining land, is identified for High Rise Residential in the Campbelltown Precinct Plan; and



- secondly, Item 4.2 in the list of actions under the heading “Increase housing diversity and choice” in Section 9.1.4 of the Draft Housing Strategy identifies as an action “continue to implement the NSW Government’s Precinct Plans for Glenfield to Macarthur Urban Renewal Corridor” (This action however is only in relation to “encouraging medium density housing development”).

No explanation is provided in the Draft Housing Strategy of its failure to implement the relevant NSW Government strategy for the Campbelltown Precinct. In this regard, Ministerial 9.1 Direction 7.7 relevantly states:-

“7.7 Implementation of Glenfield to Macarthur Urban Renewal Corridor

Objective

- (1) The objective of this direction is to ensure development within the precincts between Glenfield and Macarthur is consistent with the plans for their precincts.”*

If the Draft Housing Strategy was made consistent with the Campbelltown Precinct Plan significantly reduced development pressure would be placed on greenfield locations in Campbelltown which are far less well-located in relation to the public transport and proximity of the CBD. Also, such action will also make the Draft Housing Strategy more consistent with the Greater Sydney Region Plan (2018) and with Western City District Plan (2018).

We would like an opportunity to meet with you to discuss the issues we have raised above. Ideally, however, we would like to see the Draft Housing Strategy amended to be consistent with the Campbelltown Precinct Plan at least insofar as that Plan provided for High Rise Residential development on our clients’ properties.

Yours sincerely,

BBC Consulting Planners

Robert Chambers
Director
Email

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2.1.4 Local Housing Strategy Guideline

The Department of Planning Industry and Environment's *Local Housing Strategy Guideline* (2018) sets out requirements for the LHS, including a template. The template is to be used by all councils within Greater Sydney to prepare their housing strategies. This document complies with the requirements of that guideline. Some sections of this report are presented in a different order to the template in response to local issues or readability of the report. The table below identifies the location of the required information.

Table 3: Compliance with Local Housing Strategy Guideline

Guideline reference	Required information	Location in this document
	Executive summary	Executive summary
1.1	Planning and Policy context (Provided in a separate section due to the length of content)	Section 2
1.2	LGA snapshot	Section 1.2
1.4	Housing Vision	Section 2.1
2.1	Demographic overview	Section 4.0
2.2	Housing demand	Section 5.2
2.3	Housing supply	Section 5.1
2.4	Land use opportunities and constraints	Section 3
2.5	Housing supply gaps	Section 5.2.11
2.5	Identifying areas with development capacity	Section 8.4
3.1	Housing strategy objectives	Section 8.1
3.2	Land Use planning approach	Section 8.5/8.6
3.3	Mechanisms to deliver the options	Section 8.5/8.6
3.4	Evaluation of the options	Section 8.5/8.6
4.1	Implementation and delivery plan	Section 9
4.2	Planning proposal	N/A
4.3	Monitoring and review	Section 9

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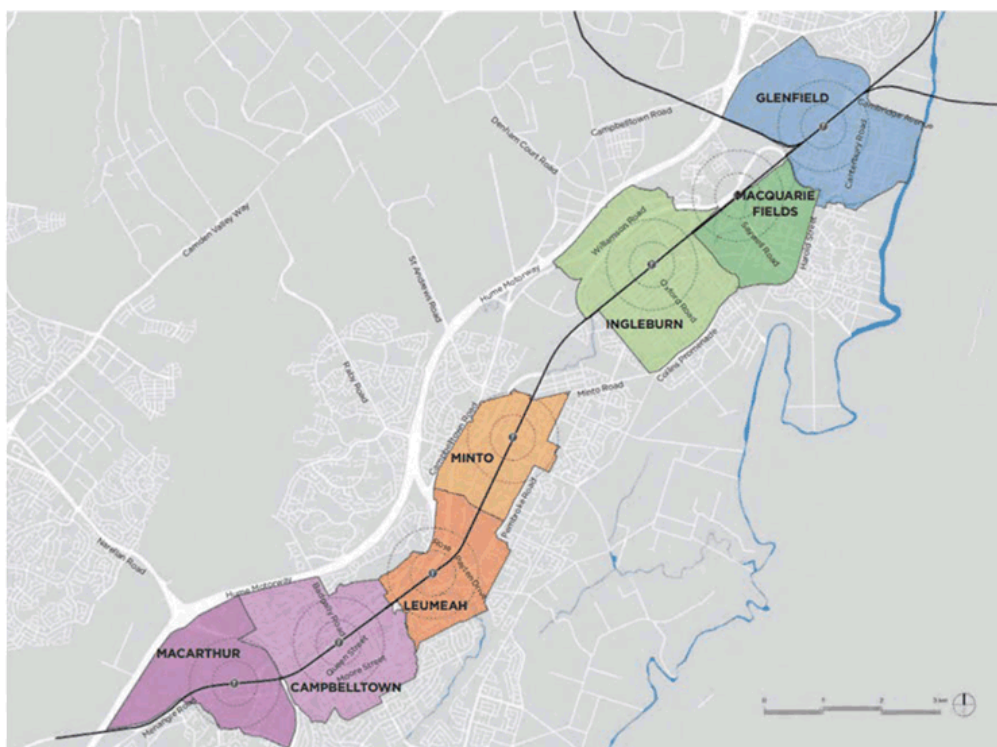


2.1.5 Glenfield to Macarthur Urban Renewal Corridor Strategy

The *Glenfield to Macarthur Urban Renewal Corridor Strategy* (2015) provides a plan to guide future growth of homes and jobs in accordance with the '30-minute city' concept, delivering outcomes in seven 'station precincts' – Glenfield, Macquarie Fields, Ingleburn, Minto, Leumeah, Campbelltown and Macarthur (Figure 3). The corridor is focussed along 15km of the existing Rail Line with the boundaries for each precinct generally within an 800-metres to 1.5-kilometre radius from the rail stations to provide for more homes and jobs within the '30-minute city.'

Each of the station precincts have precinct plans as prepared as part of DPIE planned precinct work prior to 2020. Centre precincts are subject to individual planning proposals that Council is currently commencing. This LHS considers the order of priority for planning proposals for the key centres.

Figure 3: Glenfield to Macarthur Urban Renewal corridor



Source: Department of Planning and Environment, 2015

The Strategy establishes a strategic planning framework to guide future development and infrastructure delivery throughout the corridor over the next 20 years.

The Strategy aims to:

- Identify the environmental and built form constraints and opportunities for renewal
- Develop a vision and land use plan for each precinct
- Project appropriate housing and employment growth to 2036
- Be informed by market demand and economic feasibility analysis
- Incorporate a high-level infrastructure capacity analysis

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- Identify the infrastructure required to support projected growth
- Develop a framework to guide future land use change
- Provide an evidence base for more detailed precinct planning
- Establish an implementation and monitoring framework.

The Strategy to be delivered under the Land Use and Infrastructure Strategy will provide a projected 15,000 additional dwellings to 2036. The Strategy seeks to increase building heights in areas within close proximity to train stations. Generally, areas within 800m of the station are identified for gradual increases in building heights.

The DPIE publicly exhibited plans for the Glenfield - Macarthur Urban Renewal Corridor in late 2015. After considering submissions received, plans were finalised for six of the seven station precincts in late 2017.

A Section 9.1 Planning Direction applies to planning proposals within the Glenfield to Macarthur precincts as follows:

What a Relevant Planning Authority must do if this direction applies

(4) A planning proposal is to be consistent with the precinct plans approved by the Minister for Planning and published on the Department's website on 22 December 2017.

Consistency

(5) A planning proposal may be inconsistent with this direction only if the relevant planning authority can satisfy the Secretary of the Department of Planning and Environment (or an officer of the Department nominated by the Secretary), that:

(a) the provisions of the planning proposal that are inconsistent are of minor significance, and

(b) the planning proposal achieves the overall intent of the precinct plans and does not undermine the achievement of its objectives, planning principles and priorities for the urban renewal corridor.

(Direction 7.7)

The Section 9.1 Planning Direction creates an opportunity to implement planning controls that support substantial housing delivery, subject to market and developer interest.

2.1.6 Greater Macarthur 2040 (2018)

Greater Macarthur 2040 is a land use and infrastructure implementation plan to set a vision for the Greater Macarthur Growth Area as it develops and changes. The plan sets a long-term vision and provides a framework for the future of the Glenfield to Macarthur urban renewal corridor and the land release areas from Menangle Park to Appin.

The structure plans (Figure 5 and Figure 6) are shaped around:

- Establishing a koala reserve by using public land for koala park and securing green corridors for other species
- Designing new infrastructure to protect koalas by using koala proof fences to prevent the risks of roadkill
- Transport-oriented development in both urban renewal and land release precincts
- Homes in a variety of forms to meet the needs of people of different ages and incomes
- A highly accessible transport corridor connecting Campbelltown-Macarthur, Gilead, Appin and Douglas Park
- Three new east-west connections to the Hume Motorway to support the delivery of the Growth Area in sectors
- Public open space and amenities for new communities
- Walkable neighbourhoods for all age groups
- Cycle paths connecting neighbourhoods with public transport, jobs, education and open space
- Economic development opportunities through an economically strong Campbelltown-Macarthur with new centres at Glenfield, Menangle Park, Gilead and Appin (noting Appin is outside of the Campbelltown LGA).



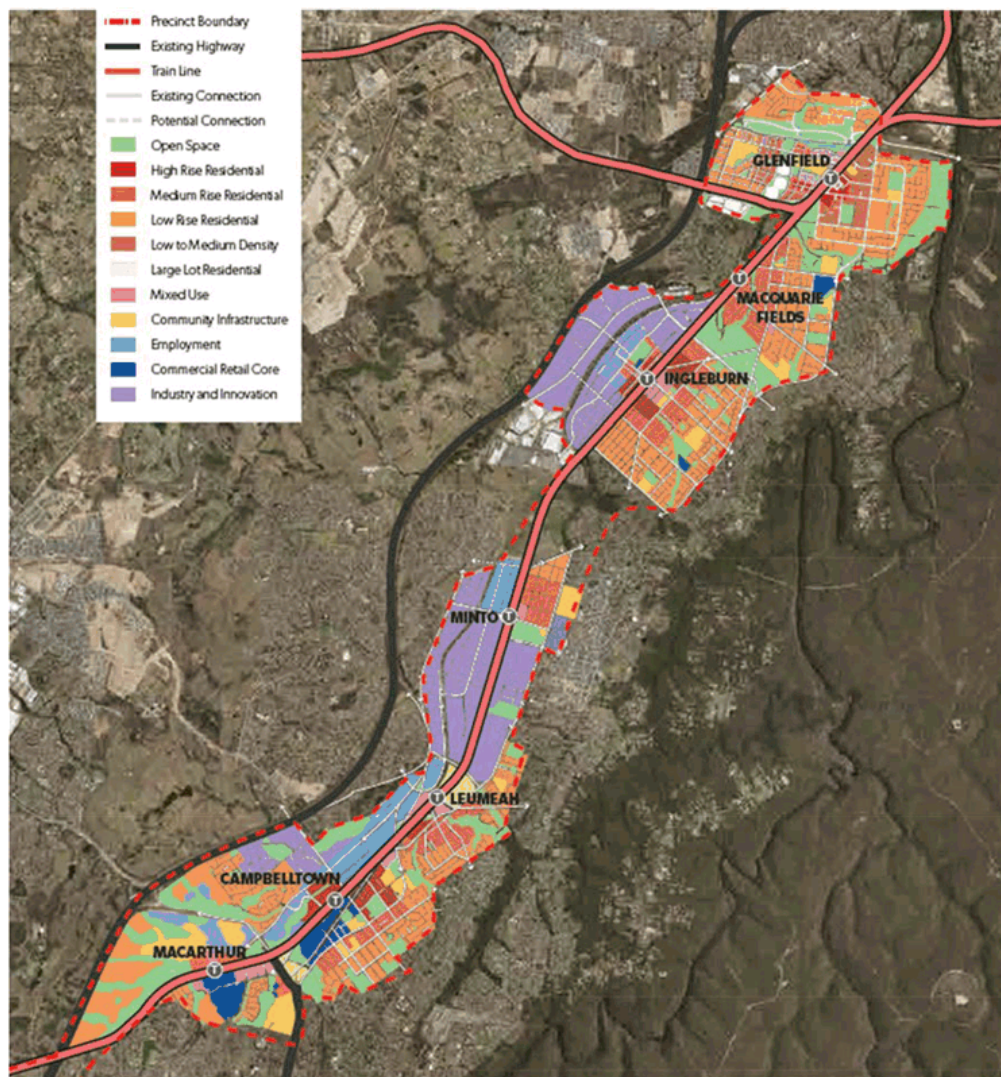
In the plan, each of the Growth Area's 12 precincts has a distinct character and development capability. Seven precincts are located along the rail corridor with the vision that they will be renewed to provide medium to high density homes and jobs. The new land release precincts will deliver low to medium density homes and employment. The plan highlights Menangle Park to deliver 4,000 new homes and Gilead to deliver 15,000 new homes within the Campbelltown LGA.

The plan recognises the regions natural landscape as a great asset and attractor and through the individual precinct plans and the new release area plans the landscape and visual qualities of the Growth Area are envisioned to be conserved. According to the Plan each precinct plan must be informed by a landscape assessment, provide street and open space networks and be informed by a Green Plan that focuses on the provision of tree canopy and high quality integrated open spaces. The residential development as part of the Greater Macarthur 2040 plan is not envisioned to go beyond the bounds of the structure plan

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Figure 5: Greater Macarthur 2040 Structure Plan (urban renewal areas)

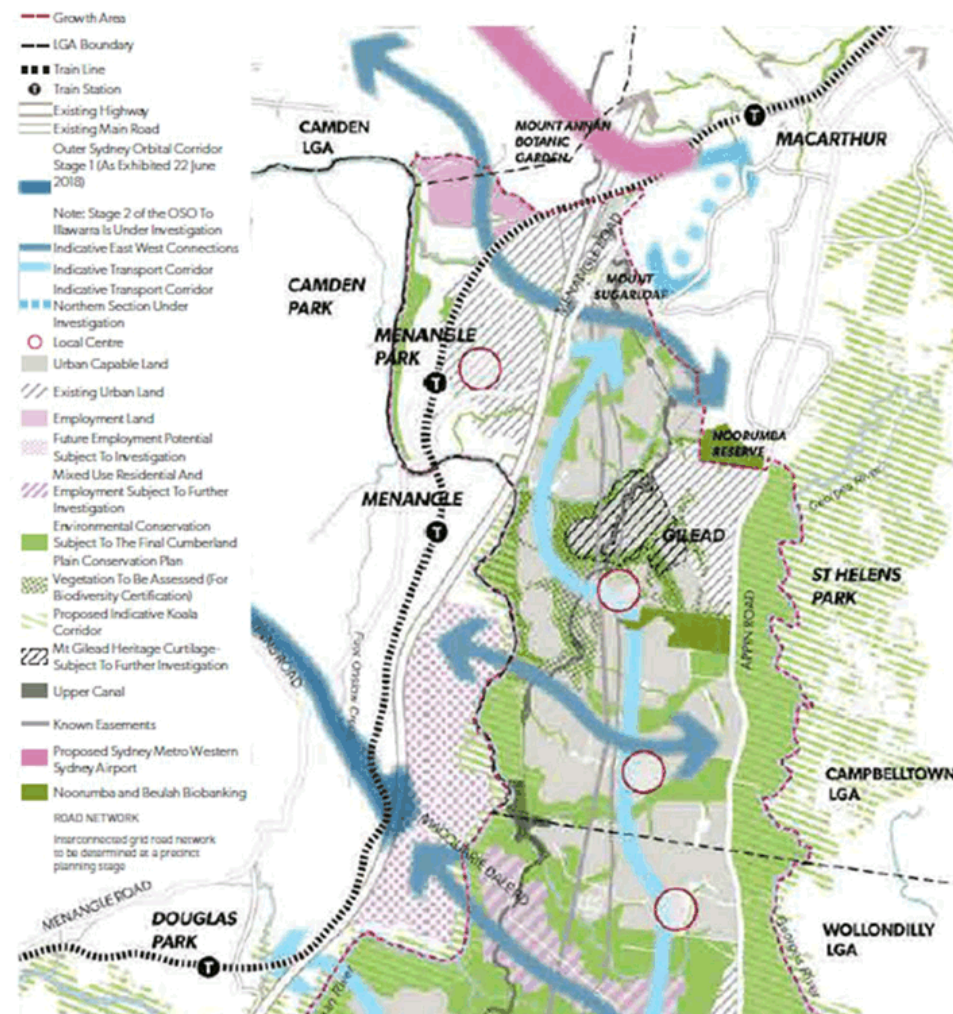


Source: Department of Planning and Environment, 2018

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Figure 6: Greater Macarthur 2040 Structure Plan (land release areas)



Source: Department of Planning and Environment, 2018

2.1.7 Key Findings

The key findings relevant to the LHS from the above document review are:

- The preparation of this strategy is a key action of the LSPS and is required to comply with the DPIE and GSC requirements as outlined in the guideline
- This strategy must use the DPIE population projections as per the Western City District Plan however, Council have also had projections provided by .id that project larger growth. The direction from Council is to compare both sets of data for the LHS.
- Housing needs be a range of types, tenures and price points to cater for different stages of life and diversity of household types
- Residential development needs to be linked to infrastructure development.

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- Residential growth should be aligned with jobs and connectivity under the 30 minute city concept.
- Campbelltown is expected to see a significant growth to 2041, particularly in school aged children and families increasing demand on education and social infrastructure.
- Glenfield to Macarthur urban renewal corridor is a key outcome for the Western City District Plan and will provide growth in areas with access to existing transport infrastructure.
 - The six precinct plans include plans for increased density as well as employment and services lands with approximately 18,000 additional dwellings.
 - The growth areas to the south of Macarthur in Menangle Park and Gilead are expected to provide approximately 19,000 additional dwellings by 2036.
 - Development is to be integrated with open space and active transport networks to promote high amenity and connected communities.
- Growth with appropriate infrastructure is a key concern of the community with housing affordability and availability a popular issue.
- Future residential development should be focused in the existing urban settlement area to maintain and protect the scenic and environmental character of the area.

2.2 Campbelltown City Council policies

2.2.1 Campbelltown 2027 – Community Strategic Plan

The Campbelltown Community Strategic Plan (CSP) was prepared in 2017 and intended as the primary strategic planning document for Campbelltown LGA. The document outlines the aspirations of the city's people, and details how Council and other key stakeholders envision achieving them over a 10 year period to 2027.

The CSP acknowledges population growth as a key pressure on the Campbelltown LGA for this period. Campbelltown was named a priority growth area and a strategic centre by the NSW government. This sentiment has been carried through to the more recent Greater Sydney Commission strategic plans and strategic documents released by Council.

Two key goals that drive the outcomes of the CSP are:

"Our community is able to celebrate its diversity, make a contribution to, and enjoy the lifestyle opportunities offered by our city. Our city is a place where people want to live – it is creative, innovative, vibrant and resilient. It is a city that is designed for people, with easy access to high quality housing, services, amenities and open space. It is a community where people feel safe, socially connected and included. We celebrate our rich heritage and diversity and respect our strong ties to Aboriginal culture. Our people enjoy the lifestyle offered by the city – a city which is a destination of choice."

and

"We are a modern, forward thinking, connected city. We have built on our history and character and shaped a city which transforms in line with its community and its needs. Our people value a balance between the built form and open space, and are kept informed of infrastructure delivery, including better health and education infrastructure and services. Our city and our people are connected through strategic road networks, transport systems and pedestrian facilities. Council strategies are developed in line with the draft South West District Plan and complement State Government plans for the city. Our city is reinvigorated – it is a city where people choose to be."

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The section below includes maps of lots with development potential in each location. Development potential excludes heritage sites, strata lots and bush fire prone land, with a desktop review to filter out land with non-residential uses such as schools and churches, where clearly identifiable. Additional information regarding transport and social infrastructure and servicing were sourced from publicly available records.

8.4.2 Campbelltown

Reimagining – Campbelltown City Centre Master Plan suggests that to effectively serve the Macarthur region as the metropolitan CBD, it is likely that Campbelltown may ultimately need to accommodate a population in the order of 120,000 to 180,000 people in the City Centre.²⁶ The *Reimagining – Campbelltown City Centre Master Plan* has capacity to deliver an additional 15,609 homes across the three centres of Macarthur, Campbelltown and Leumeah by 2040. Significant housing development will be needed to support this population growth. Housing development will need to contribute to overall liveability and place outcomes for Campbelltown CBD by providing higher density, integrated urban outcomes within a walkable mixed use precinct.

Within the timeframe of this LHS, the Department has identified housing growth potential for 8,250 dwellings for the Campbelltown, Macarthur and Leumeah precincts. In this regard, the land use vision under the *Reimagining – Campbelltown City Centre Master Plan* provides for higher housing growth near the city centre than envisaged under the Department's Campbelltown Precinct Plan.

Providing high rise buildings close to Campbelltown Station will maximise pedestrian activity and increase trade for local businesses in the Queen Street Commercial Core. A mixture of detached dwellings, townhouses and terraces is envisaged to the east of Lindesay Street to retain the character of that area.


Table 34: Campbelltown profile

Campbelltown	
Characteristics	Campbelltown is the administrative, cultural and transport centre of Campbelltown LGA, approximately 41 kilometres from Sydney's CBD. The eastern side of the rail line is a mix of civic and retail functions as well as low, medium and high density residential housing which is complimented by considerable at-grade parking and open space. Light industrial and bulky goods uses are predominant on western side of the railway station. Campbelltown Railway Station is between Leumeah and Macarthur Stations on the Cumberland, Airport, Inner West and South Lines.
Predominant housing type	Primarily commercial core and mixed use land zones with areas of high density residential to the west of Moore Street and low/medium density residential to the east. To the west of the railway station is the Western Sydney University and TAFE NSW campuses and business development zoned lands with residential lands beyond.
Lots size	The residential lots in this area are generally between 400 m ² and 800 m ² . Minimum lot size in the CLEP 2015 residential area is generally 500m ² . The areas closest to the station are generally unspecified minimum lot size.
Estimated dwelling potential	LSPS refers to the Greater Macarthur 2040 plan that states the Campbelltown precinct has potential for 3,600 new homes.
Existing facilities and services	<ul style="list-style-type: none"> Seven parks and reserves as well as the community hall, art centre, showground, rugby club, aquatic centre, library, scout hall, civic hall, Eight schools

²⁶ Campbelltown City Council (2020) *Reimagining Campbelltown – City Centre Master Plan 2020*

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Campbelltown		
	<ul style="list-style-type: none"> 11 preschools, kindergartens and family day care centres A fire station, police station Anglicare, Burnside family centre and St Vincent de Paul, Catholic club and five places of worship Campbelltown Mall, RSL Community services centre, sexual health clinic, infant, child and adolescent mental health service, youth health service, family and community services, Six medical centres 	
Frequency of peak hour train services	Trains depart approximately every 15 minutes.	
NSW Government's vision		
Planned infrastructure	<ul style="list-style-type: none"> Mawson Park and Campbelltown Showground upgrades Local community centre within the sports precinct Broughton and Badgally Road Bridge upgrade Upgrade to signalised intersection a Pembroke Road and O'Sullivan Road, Rose Payten Drive and Airds Road, Badgally Road, Johnson Road and North Steyne Road and Bradbury Ave and Oxley Street. Cycleway works heading east towards Mawson Park connecting to Condamine St and heading west towards Blaxland road Footpath improvements, pedestrian crossings, street tree planting, bicycle storage facilities and lighting 	
Development pipeline for Campbelltown and Macarthur combined	Short-Term 2020 to 2021	101 x apartments 26 x townhouses 22 x residential dwellings
	Medium-Term 2022 to 2023	42 x apartments 86 x townhouses 8 x dual occupancies

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Campbelltown				
	Long Term 2024 to 2025			144 x townhouses 172 x townhouses
Housing prices	Median house price	\$557,500	Median unit price	\$420,000
	Median rent for house	\$400 PW	Median rent for unit	\$370 PW
Strategic vision	<ul style="list-style-type: none"> Revitalise Queen Street to be a safe, active, green and unified public space Provide a new state of the art City Library where people come to meet, connect, create, learn, engage, work and relax - becoming the heart of the community. Establish vertical education campuses where they can directly connect with and leverage surrounding uses and industry clusters. For example, a second WSU campus focussed on law and business would support a revitalised commercial office cluster and support retail growth. Establish a Community and Justice Precinct to leverage the expansion of Campbelltown's existing Local, District and Childrens' Courts along with associated support services. Provide opportunities for next generation industrial uses to the west of the train station for higher value industrial uses benefitting from proximity to the Core CBD Enhance city centre station interchange as the gateway, delivering commuters and visitors from all around Greater Sydney Create new pedestrian and cyclist connections to bridge major transport corridors and create a more integrated and accessible city centre Develop the Campbelltown Billabong Parklands to provide unprecedented and distinctive recreational facilities as a focal point for the community, region and beyond Establish the Cultural Precinct at the heart of located at the centre of the city including a National Aboriginal Cultural Centre and Campbelltown Arts Centre as the premier cultural facility in Sydney's South West. 			
Development outlook	Development outlook is strong, subject to the current market downturn. Recent high rise housing development in or adjacent to the CBD demonstrates developer interest in this product under the "right conditions." Planned investment in the CBD will encourage future residential development activity. The CBD has significant capacity as indicated in Figure Amalgamation of lots could be encouraged through developer centres where a public benefit would result.			
Suited for Affordable housing contributions scheme	Yes, subject to feasibility testing (see Section 8.7). Campbelltown CBD is an ideal location of affordable housing as there is significant potential for new residential development and the location offers access to jobs, transport and services.			
Suggested development timeframe	Ongoing			

DRAFT - NOT COUNCIL POLICY



Figure 61: Lots with development potential in Campbelltown



Reimagining – Campbelltown City Centre Master Plan provides a comprehensive implementation plan to achieve the vision summarised above and the delivery of housing and employment growth in a sustainable manner. Housing development in the CBD has an important role to play in delivering population growth to support local businesses and investment in the Campbelltown CBD. Increased population and pedestrian movement will assist in activating the CBD and creating a vibrant, liveable and interesting regional and strategic centre.

The current planning controls permit significant housing within the CBD. Ten and six storey shop-top housing typologies have been emerging in the CBD and surrounds over the past five years, demonstrating market interest. Housing development in the CBD is important to meeting the housing needs of the future population including diversifying the housing stock improving affordability and choice.

Under the *Reimagining – Campbelltown City Centre Masterplan*, housing growth for the Campbelltown Centre is generally limited to the eastern side of the rail line, within mixed / use high density and medium density residential areas. In this respect, the western side of the rail line, in the vicinity of Blaxland Road, is identified as having future potential for residential to be integrated as part of a future Tech and City Servicing Innovation Precinct.

DRAFT - NOT COUNCIL POLICY



Suggested actions

The following planning options are relevant to Campbelltown CBD:

- Consider stimulating development activity by providing planning incentives through amendments to CLEP 2015. Creating opportunities to improve development feasibility may encourage developers to take up the available development potential, particularly as lot amalgamations will be required to achieve development outcomes (see Figure 61). Incentives that could be considered include:
 - The potential for bonus floorspace in return for provision of community facilities or public benefits and design excellence
 - The potential to negotiate increased floor space as part of voluntary planning agreements
 - Reduced parking requirements given proximity to rail station and introduction of shared car schemes.
- Encourage an appropriate mix of apartment sizes to meet the growing need for diversity in dwellings and more affordable dwellings. Council has the option to prescribe a dwelling mix through their development control plan. Currently, working with developers to achieve a desired dwelling mix is considered appropriate.
- Consider an affordable housing contribution in new apartment and shop top housing development either:
 - As part of an Affordable Housing Contributions Scheme whereby the contribution rate is set subject to feasibility testing
 - As part of a Voluntary Planning Agreement whereby the contribution is subject to negotiation but should generally be a minimum of 2 per cent (For further details see section 8.7)/
- Review planning provisions for high rise developments noting the need to:
 - Ensure built form controls permit feasible development
 - Ensure planning controls can be easily interpreted and understood by industry
 - Require demonstrated design excellence for larger developments
 - Consider restrictions on the potential to overshadowing key public spaces
 - Development should contribute to the provision of a public benefit through amenity improvements, which once implemented will improve property values and marketing opportunities.
- Collaborate with landowners, developers and government agencies to unlock the development potential of strategic holdings in Campbelltown CBD to deliver housing and improved amenity, including car park sites owned by Council.
- In five to 10 years, reassess the needs for additional capacity in the Campbelltown CBD based on trends in development activity and take up, with a view to increasing development capacity, if needed, including:
 - Small scale up-zonings such as continuing the R3 zone between Apex Park and Campbelltown Public School, bound by Bland Street, Bradbury Avenue, Lindesay Street, Allman Street and Oxley Street, to provide more opportunity for medium rise infill residential development
 - Rezoning northern end of Campbelltown to R4 High Density to assist in consolidating the centre or alternatively, in the B4 Mixed Use zone enable a greater diversity of ground floor uses such as light industry and specialised retail, which currently do not qualify under the 'shop top housing' use
 - Review the suitability of land to the west of the railway for city centre living opportunities.



9 September 2020

City Development - Draft Local Housing Strategy
Campbelltown City Council
PO Box 57
Campbelltown NSW 2560

Dear Campbelltown City Council,

Submission in respect of: Draft Campbelltown Local Housing Strategy

Introduction

This letter is submitted by The Salvation Army Australia in response to the exhibition of the Draft Campbelltown Local Housing Strategy (Housing Strategy). The Salvation Army have a long and proud history of providing spiritual and social assistance in the local, Sydney and Australian Community. We provide critical outreach and support where it is needed most to better physical, emotional and spiritual health. Our property holdings are fundamental to the services we provide and to reflect the importance of the future planning in the Council area and the local community we have been actively involved with Council and the Department of Planning, Industry and Environment in the Greater Macarthur Growth Area Plan, Reimagining Campbelltown plan and Local Strategic Planning Statement.

The Salvation Army are significant stakeholders in the Local Government Area and appreciate the opportunity to make a submission on the Housing Strategy and for the consultation undertaken by Council. Further, we acknowledge the work and forward planning in compiling the Housing Strategy to better plan for the future housing of our community. The Salvation Army agree and support The Strategy outcomes and the implementation of actions to implement the key objectives. The Salvation Army, believe of key importance are:

- Provision of affordable housing;
- Accessibility and inclusive design; and
- Support for higher density and mixed use within walkable distance to train stations.

With the implementation of these key considerations within the right framework, the appropriate environmental protections and investment in community infrastructure can be enacted to ensure a wholistic planning approach for the improved health of the community and environment.

In the delivery of our social services and community outreach provisions, our model is to locate where we can provide the most impact, to the most people, with this generally in town centres, close to public transport. To this end we support the reinvigoration of the town centres as provided in the Glenfield to Macarthur Urban Renewal Corridor precinct plans with support and consideration for the provision of social services and affordable and social housing.



Existing Policy Framework

The Housing Strategy provides a thorough review of the existing planning policy. The existing body of reviews are substantial, with the review of these documents reflecting key findings that:

- The Campbelltown City Council area will experience substantial growth in the population and requirement for housing over the next 16 years (with larger growth forecast by .id on behalf of Campbelltown City Council);
- A greater range of housing types and price points are required to cater for the current and future needs of the residents;
- Growth (employment and housing) should be focused around existing transport infrastructure;
- Increased infrastructure is required to support this growth, particularly education and social infrastructure;
- Housing affordability and availability is a key concern from the community; and
- Residential development should be focused in the existing urban settlement to protect the scenic and environmental character of the area.

The Salvation Army support these key findings, however encourage the appropriate and timely planning implementation and changes. Through appropriate, timed actions in implementing the planning outcomes, Campbelltown City Council and the other key stakeholders can provide this framework. This is illustrated in table 6: opportunities and constraints. This table highlights the opportunities to embrace existing infrastructure and town centres, whilst creating a framework for future investment to provide service for current and future residents through increased housing. This focus of development in the existing town centres is supported as it:

- Can meet the varied housing needs of the community now and into the future;
- Efficiently utilises the existing infrastructure whilst creating a framework for future infrastructure to service the current and future community;
- Protects the environment through limiting urban sprawl and loss of native vegetation;
- Provides increased opportunity and viability of town centres through increased utilisation which has the reciprocal benefit of creating further services and employment opportunities to the community;
- Increases public transport utilisation reducing car dependency and associated traffic and pollution impacts; and
- Increases accessibility of the residents and community to services, employment and other community infrastructure to improve the health of the population.

Through careful planning and an appropriate and considered design response, the constraints can be limited, and the opportunities embraced. These planning outcomes will result in an improved environment for us all with efficient use of our natural and manmade resources and infrastructure. The implementation of this plan is important, to ensure appropriate and timed actions with the correct resources and appropriate allocations and accountability.

**Local Context and Demographics**

The Housing Strategy covers in detail the existing local context and current and future demographics. It provides a picture of a growing, young and a multiculturally diverse community which creates substantial opportunities. Additionally, it does highlight the disadvantage in our community, with social and economic challenges including high unemployment. The review undertaken highlights the need for additional housing, it also highlights the need for a diverse range of housing to meet the varying household structures, price points and affordability requirements.

The planning and policy framework will guide the various inputs to create the appropriate type and amount of housing for the community. It is therefore imperative to get this right. Further, it is important to consider the time taken from strategic planning, to control drafting and implementation, market response and development application, development approval, housing construction and availability. This is a process that takes many years from initial strategic planning to housing creation. For this reason, it is critical that the correct framework is created and implemented early. Further, it is important to consider that planning and housing provision is not a perfect, linear outcome. Despite the framework being created, market forces, economic pressures and personal decisions can accelerate or decelerate the process. It is therefore important to create the framework in a timely manner and not delay progress, however ensure appropriate and timely reviews and forecasting are undertaken throughout the process.

Housing Framework, Objectives, Implementation and Outcomes

As highlighted above, The Salvation Army support Council's forward planning, creation of objectives and the implementation of these objectives to meet the needs of the community now and into the future and supports all 10 of the Housing Objectives provided in section 8.1 of the Housing Strategy. Further, the planning to utilise existing town centres and infrastructure to facilitate the substantial housing creation required is supported. The planning framework including the LEP and DCP will therefore need to facilitate this planning outcomes to create additional housing, infrastructure and employment with the associated community services to support this.

The Department of Planning, Infrastructure and Environment has undertaken substantial works reflected in the Greater Macarthur 2040 which was completed and exhibited late 2018 and early 2019, and the Glenfield to Macarthur Urban Renewal Precincts works commencing in 2015 and being completed in late 2017 for implementation. The Housing Strategy also incorporates more recent input from Reimagining – Campbelltown City Centre Master Plan into the Campbelltown town centre review in section 8.4. Substantial and important time has passed in the implementation of the NSW Governments reviews. It is therefore critical in the adoption and implementation of this Housing Strategy that the suggested actions are interrogated, with the outcome of creation of steps that are set to a time and delegated to an appropriate and accountable resource to ensure timely execution.



Leumeah Station Precinct

As highlighted in the Housing Strategy the Leumeah Station Precinct is ideal for housing including affordable housing, with substantial potential for new residential development with existing infrastructure that provides access to jobs, transport and services. It is further indicated that the Development Pipeline is very limited, with 22 dwellings being created in the short-term (2020-21) and 13 dwellings in the medium-term (2022-2023). Further, The Salvation Army support the findings from the Glenfield to Macarthur Urban Renewal Precincts findings and implementation of this plan in Leumeah.

This high potential and current limited supply are also coupled with the community interest in progressing the precinct early and the need for reinvigoration of the area. As can be seen in table 42, Leumeah scores mid to highest of the town centres in regional/local attractors, amenity and access to infrastructure / services. The lowest scores of market depth and development pipeline reflect a need for reinvigoration through planning and investment. It is also flagged that the low score of train frequency reflects a train indicatively every 15 minutes, this however could be improved through trains not bypassing the station if the demand necessitated it i.e. the infrastructure to improve this in Leumeah already exists. With the first suggested actions for the town centre in the Housing Strategy being *"Monitor the progress of housing delivery in the LGA to determine when Leumeah should be rezoned, likely beyond 2021"* it is highlighted that the lag between commencing a planning proposal and housing creation is long. It is therefore imperative that the planning and implementation commences early to progress the other suggested action to *"Prepare a planning proposal, when needed, to implement the NSW Government's Leumeah precinct plan"*.

The above suggested actions are supported by The Salvation Army. Additionally, we consider it appropriate that unsolicited Planning Proposals are considered by Council to expedite housing delivery to reflect market demand and community requirements. This is as supported by the other suggested action of *"Set clear expectations for unsolicited planning proposals and assess them on their individual merit, with respect to the broader strategic vision"*.

Attached to this submission is the previous LSPS submission to provide background. It is highlighted that The Salvation Army property at 27-31 Rudd Rd, Leumeah provides significant opportunity for housing provision, as identified in the NSW Governments Vision. Further, it is noted that the site, being of 6,300m² is not identified in Figure 67 - Lots with development potential in Leumeah. The summary of the property is below, with further detail provided in the attached LSPS submission.

- Strategic location in an identified centre: within walking distance to rail supporting the proposed increased densities on the site.
- Site Attributes: large size, single owner, unencumbered by constraints e.g. heritage, vegetation, bushfire;
- Existing context: has existing surrounding medium density - so additional height and density in a strategic location can be accommodated.

**Conclusion**

The Salvation Army support Campbelltown City Council in progressing future planning in the Draft Campbelltown Local Housing Strategy and encourage the implementation of the suggested actions in a timely manner, delegated to an appropriate and accountable resource to ensure execution. This planning will create the framework for the growth and health of the community, with appropriate, affordable and sufficient housing that will generate investment in infrastructure, and create employment sources, community services and a better community and environment.

We acknowledge the work and forward planning in compiling the Housing Strategy to better plan for the future housing of our community. The Salvation Army agree and support The Strategy outcomes and the implementation of actions to implement the key objectives in a timely manner. The Salvation Army, believe of key importance are:

- Provision of affordable housing;
- Accessibility and inclusive design; and
- Support for higher density and mixed use within walkable distance to train stations.

With the implementation of these key considerations within the right framework, the appropriate environmental protections and investment in community infrastructure can be enacted and ensure a wholistic planning approach for the improved health of the community and environment.

We appreciate the opportunity Campbelltown City Council has provided us and offer our time to continue to consult and collaborate on the future progress of this Housing Strategy and plans in the Campbelltown area.

Yours Sincerely

Oliver McGeachie

Senior Development Manager
National Property Group
The Salvation Army Australia

Attachment:

- Submission in respect of: Draft Local Planning Statement – Campbelltown dated 22 July 2020
- Submission in respect of: Greater Macarthur Growth Area dated 8 February 2019



22 July 2019

Lindy Deitz
General Manager
Campbelltown City Council
PO Box 57
Campbelltown NSW 2560

Dear Madam,

Submission in respect of: Draft Local Planning Statement - Campbelltown

Introduction

This letter is submitted by The Salvation Army Australia in response to the exhibition of the Draft Location Planning Statement – Campbelltown. The Salvation Army own several properties in the Local Government Area and appreciate the opportunity to make a submission on the Statement and for the consultation undertaken by Council. The Salvation Army properties highlighted to Council are:

- 1 Mountain Ash Road, Macquarie Fields; and
- 27-31 Rudd Road, Leumeah.

We would appreciate the chance to further consult with Council on the Statement and these properties.

The Salvation Army and Properties

The Salvation Army are significant stakeholders in the Campbelltown City Council area and have a long and proud history of providing spiritual and social assistance in the Community. The Salvation Army support future planning for the growth and health of the community, with investment in infrastructure, housing (especially social and affordable housing), employment sources, community services and creating a better community and environment as proposed in the Draft Local Strategic Planning Statement.

The Salvation Army have consulted with Council recently in relation to 27-31 Rudd Rd, Leumeah and additionally in relation to the social services we can be providing in the community in the short and long term. Attached is the submission issued to the Department of Planning and Environment and Campbelltown City Council in relation to the property at 27-31 Rudd Rd, Leumeah. It is highlighted within this submission:

- Strategic location in an identified centre: within walking distance to rail supporting the proposed increased densities on the site.
- Site Attributes: large size, unencumbered by constraints e.g. heritage, vegetation, bushfire;
- Existing context: has existing surrounding medium density - so additional height and density in a strategic location can be accommodated.



The Department of Planning provide for seven storeys and over and therefore the extent of height above seven storeys is not defined. As part of this submission it is highlighted that we are available to provide further supplementary information to validate and confirm the proposed height and density.

Further investigations are to occur on the property at 1 Mountain Ash Road, Macquarie Fields and we would welcome the opportunity to be involved in this review with Council.

Conclusion

The Salvation Army support Campbelltown City Council in progressing future planning in the Draft Location Planning Statement – Campbelltown. Further, the future planning for the growth and health of the community, with investment in infrastructure, housing (especially social and affordable housing), employment sources, community services and creating a better community and environment as proposed in the Draft Local Strategic Planning Statement is supported.

We appreciate the opportunity Campbelltown City Council has provided us and offer our time to continue to consult and collaborate on the future progress of this Statement and plans in the Campbelltown area.

Yours Sincerely

Oliver McGeachie
Senior Development Manager
National Property Group
The Salvation Army Australia

Attachment:

- Submission in respect of: Greater Macarthur Growth Area dated 8 February 2019



8 February 2019

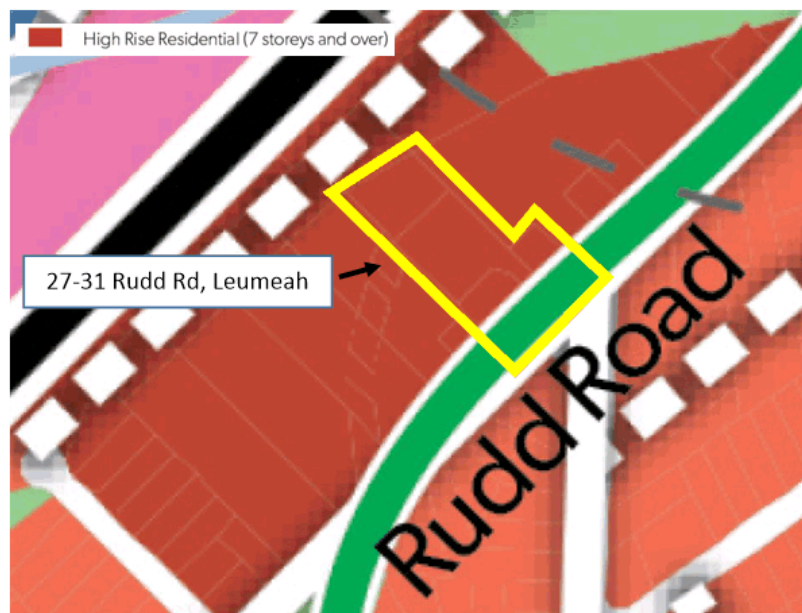
The Secretary
Department of Planning & Environment
320 Pitt Street
Sydney NSW 2000

Dear Madam,

Submission in respect of: Greater Macarthur Growth Area

Introduction

This letter is submitted by The Salvation Army Australia in response to the Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area currently being exhibited by the Department of Planning and Environment (Department). The Salvation Army are significant stakeholders in the Macarthur area and have a long and proud history of providing spiritual and social assistance in the Community. Additionally, we own land at 27-31 Rudd Rd, Leumeah (see Leumeah Precinct Map Excerpt below). The Salvation Army support the investment in infrastructure, housing (especially social and affordable housing), employment sources, community services and creating a better community as proposed in the Greater Macarthur Growth Area by the Department and additionally support the proposal to amend the zoning of our property. We understand the rezoning is to occur through a Council-led local environmental plan amendment undertaken by Campbelltown City Council and wish to offer our assistance to Council in this process.



Leumeah Precinct Map - Excerpt



27-31 Rudd Rd, Leumeah

The Salvation Army own the property situated at 27-31 Rudd Rd, Leumeah (including Lot 2) as shown in the map below. The property is approximately 5,300m² and is shown below.



Map of 27-31 Rudd Rd, Leumeah (including Lot 2)

The current Leumeah Precinct Map has designated the area for High Rise Residential (7 storeys and over). The adoption of this planning outcome is supported by The Salvation Army for the following reasons:

- **Large Property size** - The property size allows for flexibility in its urban design resolution to meet dwelling creation targets, whilst optimizing urban design;
- **Proximity to the Train Station, Bus Stops and Town Center** - The property is approximately 450m from the town center and station. Additionally a bus stop is located at the front of the property on Rudd Rd, in both directions which provides access to Campbelltown in the south-east and Liverpool to the north. This service and access provides amenity for future residents and encourages use of public transport;
- **Access to Open Space** – Directly adjoining the property to the north is passive open space, with a range of other passive open spaces in close walking distance. Further Campbelltown Sports Stadium is located around 600m to the east;
- **Vegetation classified as Endangered Ecological Communities** – The property has not been identified as containing Endangered Ecological Communities;
- **Bushfire Risk** – The property is not designated as bushfire prone;
- **Heritage** – The property is not heritage listed. The future proposal for the property will need to consider the heritage items in the vicinity;



- **Land Ownership** – The property is owned in its entirety by The Salvation Army and not Strata titled. Many of the properties located in the High Rise residential area are Strata titled, which causes a significant impediment to redevelopment. The ownership of this land by a single owner provides the opportunity to provide housing in a substantially shorter period of time.

For the reasons outlined above The Salvation Army believe that the land at 27-31 Rudd Rd, Leumeah should be designated for High Rise Residential and as such support the Department's plan.

Conclusion

The Salvation Army support the Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area and the plans for Leumeah including the proposal to amend the zoning of our property. This support is in concurrence with the associated investment in infrastructure, housing, employment sources, community services and generally creating a better community. We understand the rezoning is to occur through a Council-led local environmental plan amendments process undertaken by Campbelltown City Council and wish to offer our assistance to Council in this process.

Yours Sincerely

Oliver McGeachie
Senior Development Manager
National Property Group
The Salvation Army Australia

08 September 2020

City Development - Draft Local Housing Strategy
Campbelltown City Council
PO Box 57
Campbelltown NSW 2560

Re: Draft Local Housing Strategy 2020

To Who it may concern

I am writing in response to the Campbelltown Local Housing Strategy in my capacity as a resident and disability advocate. I would like to raise three points that I think require further consideration.

Firstly, I strongly agree with the recommendation in the strategy that it is crucial to provide a range of accessible public housing options for people with disability and their families, as per section 5.2.7. As a disability advocate, I have experienced several occasions where clients have been unable to obtain public housing that meets both their accessibility needs and the needs of their family. This has included clients on the priority list for public housing, who, despite their priority status, have been waiting more than five years (and in some cases up to eight years) for a home that they can physically move around and which also accommodates their family members.

However, the strategy does not reflect the importance of providing more group housing for those with disability, which may be more suitable for some clients than public housing as a family. Since the inception of the NDIS, funding for Independent Supported Living has been available to some disability support clients. This living arrangement allows a person with a disability to live independently from their parent/carer and thus develop important skills for future independence with external support. The strategy must consider providing purpose-built housing that can be used for Independent Supported Living. Currently, most Independent Supported Living occurs in existing homes which must be modified using NDIS funding to be made accessible for clients. The outcome of this is that many Independent Supported Living homes do not fully meet the needs of their occupants straight away, as there is a lengthy process to obtain NDIS funding for building modifications. Clients are therefore prevented from entering Independent Supported Living until such funding can be accessed. Independent Supported Living is likely to be an area of substantial growth in the coming years due to the large percentage of children and adolescents currently requiring living support, as shown in Figure 45 of the strategy. These young people are likely to be looking to increase their independence from their parents/carers in the near future and would likely benefit from Independent Supported Living. It would therefore be beneficial to

include designated Independent Supported Living residences in the strategy. Further consultation with disability service providers would also improve the strategy.

Additionally, while the report acknowledges the need for increased quantity of public/social housing within the LGA, it is important to consider the quality of currently available public housing, which in most cases requires improvement. Substantial amounts of public housing in the Macquarie Fields, Ingleburn, Ambarvale and Rosemeadow areas were built 30 or more years ago. Over this period, standards for housing have changed dramatically, and so many of these homes are of very poor quality compared to current developments. The strategy could address plans to improve current public housing, as well as increasing the amount of public housing available.

Finally, the strategy identifies that public housing in the Campbelltown LGA tends to be concentrated in certain areas/suburbs. However, it would be helpful to consider where new public housing might be located in future. I would advocate for public housing to be distributed throughout the community, rather than clumped together. The concentration of public housing in certain areas has been a source of stigma/tension which could be eased through broader distribution. For example, some public housing in Minto has been redeveloped, resulting in a greater mixture of public housing with other housing types. The outcome of this has been reduced stigma attached to the area, and there appears to be greater interaction between public and private housing tenants.

The Campbelltown Local Housing Strategy reaffirms much of what we already know about the housing diversity needed in the Campbelltown LGA, currently and into the future. I ask that the above points be considered as part of the strategy review.

Your Sincerely

Ben Gilholme
Ingleburn Resident



9 September 2020

Lindy Deitz
The General Manager
Campbelltown City Council
PO Box 57
Campbelltown NSW 2560

Dear Ms Deitz,

RE: Submission to the Public Exhibition of the Campbelltown Local Housing Strategy

EXECUTIVE SUMMARY

Lendlease welcomes the opportunity to provide a submission to the Draft Campbelltown Local Housing Strategy (the Draft LHS). Lendlease continues to work with Council on the strategic vision for the Gilead precinct and notes that this is an immediate opportunity to help deliver new housing supply in close proximity to the city centre. The Gilead precinct will deliver a significant rate of housing supply at price points which are relatively affordable when measured against the Greater Sydney average.

The Campbelltown Macarthur CBD remains a significant opportunity to increase housing supply and the diversity of housing types within the LGA. The strategy to increase housing within the CBD should be recognised as an opportunity to transform the centre into a vibrant mixed-use place at all times of day and night. In that sense, we support the housing diversity strategy as the logical extension of Council's Reimagining Campbelltown vision.

Lendlease manage Macarthur Square on behalf of the owners of the Centre, GPT Wholesale Shopping Centre Fund and Australian Prime Property Fund Retail (the Owners).

Lendlease is supportive of Council's insightful and aspirational vision that has been presented in the Draft LHS. Lendlease has a long history of investment in the City of Campbelltown. We invested early in the Macarthur Square asset and over the years we built some of the early residential expansions at Bradbury. Lendlease and our partners are committed to supporting the future success of the Campbelltown-Macarthur CBD and the Campbelltown LGA more broadly.

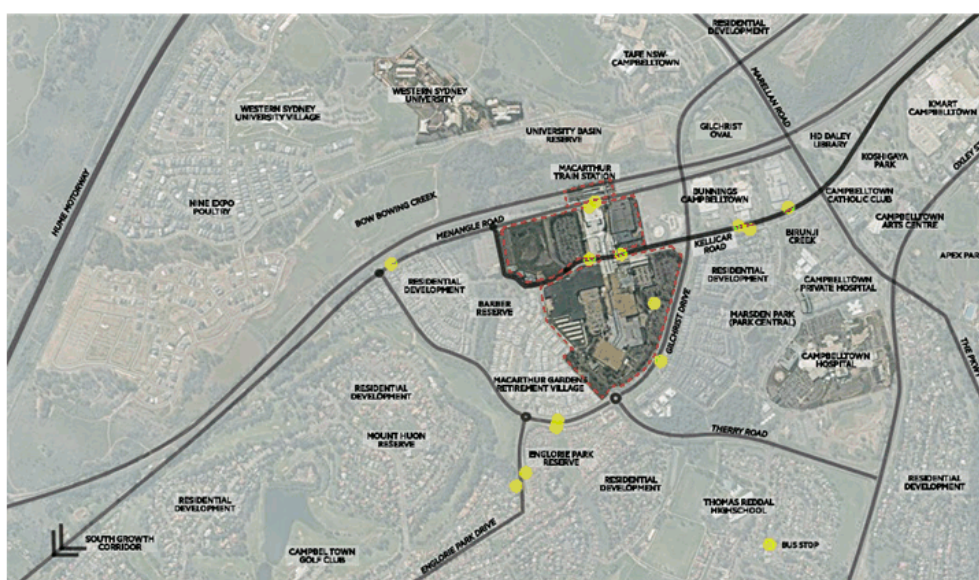
We understand that the LHS will inform future reviews of Campbelltown's local planning instruments and will also guide future planning decisions for the Glenfield to Macarthur Urban Renewal Corridor and greenfield urban release area. Macarthur Square has significant growth potential being located within an established centre. Integrating high density residential on the site will both act as the catalyst to transform Macarthur Square into a truly 24/7 mixed use centre and ensure that commercial and retail uses remain viable.

Lendlease, through the preparation of a preliminary draft masterplan, are committed to exploring potential future high density mixed development opportunities for Macarthur Square. Residential uses will form an important part of delivery of this mixed use development including the diversification and expansion of services offered and the integration of complementary non-retail uses including offices, health care, aged care, retail and innovation, and education.

This submission details recommendations to assist Council in finalising the Draft LHS. Lendlease look forward to the opportunity to discuss how the Owners' landholdings can contribute to the delivery of Council's future vision including presenting our masterplan for Macarthur Square to Council for comment.



The land on which Macarthur Square sits is a strategic landholding, and the asset has played an important role in the LGA for the past 40 years. It is the largest shopping centre in the region and is located at the heart of Macarthur town centre, adjacent to Macarthur train station and in between Campbelltown – Macarthur's Health and Education precincts, refer to **Figure 1** below for the site context.



Macarthur Square comprises of approximately 107,000sqm (Gross Lettable Area) with approximately 280 specialty stores and sees around 12.2 million visitors each year. It is the major regional retail centre servicing the south-west Sydney area.

Shopping centres such as Macarthur Square must be able to adapt and respond to the evolving customer demands, expectations and market trends. As outlined in the following section, the future vision for Macarthur Square is to evolve from a traditional enclosed shopping centre to a true twenty-first century 'Urban Growth Centre', offering more engaged and public-focused environments with active open spaces and a diversity of land uses (such as offices, health care, aged care, retail and innovation, education, and residential land uses). A flexible approach to



land use planning is therefore critical to ensure the centre can better respond to consumer demands and a changing retail environment over time.

2. Future Strategic Development Opportunities at Macarthur Square

As previously signaled to Council, Lendlease are in the process of developing a long-term Masterplan vision for Macarthur Square. Lendlease are working collaboratively with Council to consider future land use outcomes for the centre.

Macarthur Square is a significant site that is critical to the future realisation of the Campbelltown City Centre. It has immense potential to catalyse positive transformation for the Macarthur town centre. Lendlease considers that Macarthur Square can, and indeed, will need to evolve as more than just a retail centre over time. Land use and spatial planning must adapt to emerging quality public domain expectations and a changing retail landscape.

In this regard, Lendlease has commenced work on a visioning exercise to explore potential future development opportunities for Macarthur Square, including the diversification and expansion of services offered and the integration of complementary non-retail uses such as residential and office land uses. The current master planning work for the centre has identified significant redevelopment potential, to incorporate a wider range of uses that could unlock residential and employment growth over the next 20 years and beyond.

Specifically, the future masterplan vision for Macarthur Square has the potential to deliver the following benefits to Campbelltown-Macarthur and establish Macarthur Square as a twenty first century mixed use 'Urban Growth Centre':

- Consolidate Macarthur Square as the retail and mixed-use centre of Campbelltown-Macarthur.
- Contribute to meeting projected increased growth in commercial floorspace and employment.
- Opportunities to focus high-density land use activities around Macarthur Train Station.
- Delivery of a range of housing types to contribute to meeting projected population growth.
- Increased pedestrian activity and employment and economic activity for local businesses.
- Capitalise on proximity to educational and health facilities, including Campbelltown TAFE, University of Western Sydney, Campbelltown Private Hospital, and Campbelltown Hospital.
- Strengthen the identity and sense of place of the town centre.
- Urban renewal of underutilised land that is generally unconstrained in terms of heritage, riparian, flooding, vegetation, threatened ecological species, topography, bushfire, and land ownership.
- Land use diversification to better suit changing retail patterns and consumer expectations.
- A high-quality urban environment with active public open spaces and new pedestrian plaza.
- Transformation and diversification of existing land use offerings to deliver high quality local employment, education, aged care, medical, entertainment, tourism (hotel), leisure, and health uses in line with market demand.



It is requested that Council specifically reference the ongoing work that is being undertaken by Lendlease in consultation with Council to develop a masterplan for Macarthur Square in the Draft LHS.

Macarthur Square is centrally located within the Macarthur Growth Area. This places significant importance on the wider Campbelltown-Macarthur metropolitan cluster to perform multiple roles in terms of employment, connections, living, and quality of place. The Greater Sydney Region Plan – A Metropolis of Three Cities identifies Macarthur town centre as a key nodal point for a future north-west transport corridor that connects to the Western Sydney Aerotropolis.

3. SUPPORT FOR DRAFT CAMPBELLTOWN LOCAL HOUSING STRATEGY AND RECOMMENDATIONS

3.1 Overview

Lendlease is fundamentally supportive of Council's aspirations, vision, and strategic planning policy direction as presented in the Draft LHS. We also believe the Draft LHS can be further strengthened to ensure Council's twenty-year housing vision for the LGA can be achieved.

Below are key recommendations that will enable the Draft LHS to be the mechanism to achieve the housing diversity and growth in the right locations within the Campbelltown LGA.

3.2 Location of Housing Growth

The Greater Sydney Commission has set a 20-year strategic housing target of 184,500 additional dwellings in the Western City District by 2036. Part 8.4 of the Draft LHS notes that the LGA can achieve 42,250 dwellings to 2036 predominately within the Glenfield to Macarthur Corridor and greenfield areas identified in the Greater Macarthur 2040 Interim Plan.

A total of 4,800 dwellings are to be provided in Macarthur which can be achieved through development in the pipeline and would not require rezoning.

Integrating high density residential development into the site's future evolution of a multi-use centre is part of our long term plan. Residential uses are essential to the masterplan and will act as the catalyst to transform Macarthur Square into a truly 24/7 mixed use centre and ensure that commercial and retail uses remain viable on the site.

Lendlease are of the view that Macarthur Square has significant growth potential being within an already established centre which warrants consideration of accommodating higher density mixed use transit-oriented development within Macarthur. This may ultimately require Council support of future rezoning to meet the changing market demands for the Campbelltown population.

A flexible approach to land use planning will ensure Lendlease can better respond to, and assist in, achieving growth targets and projections identified in the Draft LHS.

Therefore, we request that the Draft LHS specifically identify the site as having significant potential for future high-density residential development opportunities.

3.3 Governance and Funding

The Draft LHS states that that Council are considering adopting a policy position that supports the delivery of affordable housing specifically in the Macarthur Town Centre. Whilst we understand this policy is in preliminary stages and has not yet been progressed, the Draft LHS suggests that affordable housing could be delivered through a range of mechanisms including provisions in local planning instruments.



Developer contributions have a direct influence on the market's ability to deliver additional housing delivered by the Draft LHS. To achieve these targets, it is important that Council ensure that the cumulative impact of infrastructure levies, which are often combined with a site specific VPA, do not create a restriction on the delivery of housing in the Macarthur centre.

It is important that Council consider the cumulative impact of infrastructure levies and value capture mechanisms, including potential State Infrastructure Contributions, on the future development potential of sites and the ability for Council to achieve the objectives of the Draft LHS. We recommend that Council ensure the process of developing such frameworks is transparent, and landowners and stakeholders are given the opportunity to provide input into this process.

4. Summary and Next Steps

In summary, we provide the following submission points to the Draft LHS:

- Lendlease is fundamentally supportive of Council's aspirations, vision, and strategic planning policy direction as presented in the Draft LHS. We also believe the Draft LHS can be further strengthened to ensure Council's twenty-year housing vision for the LGA can be achieved.
- Integrating high density residential development into the site's future evolution of a multi-use centre is part of our long term plan. Residential uses are essential to the masterplan and will both act as the catalyst to transform Macarthur Square into a truly 24/7 mixed use centre and ensure that commercial and retail uses remain viable on the site.
- Macarthur Square has significant growth potential being within an already established local centre which would warrant consideration of accommodating higher density mixed use transit-oriented development within Macarthur. This may ultimately require Council support of future rezoning to meet the changing market demands for the Campbelltown population.
- Noting the preliminary masterplan work already undertaken by Lendlease for Macarthur Square, in consultation with Council, it is also recommended that the Draft LHS specifically identify the site as having significant future high-density residential development opportunities.
- It is recommended that Council consider the cumulative impact of infrastructure levies and value capture mechanisms on the future development potential of sites and the ability for Council to achieve the strategic objectives and housing targets of the Draft LHS.

Lendlease is fundamentally supportive of the aspirations, vision, and strategic planning policy direction as presented in the Draft LHS. We would welcome any opportunity to discuss the key additions and recommendations in our submission.

We acknowledge the effort to prepare such a detailed strategic plan and thank Council for the opportunity to respond in anticipation of delivering a collaborative plan. Please do not hesitate to contact with any queries on this submission.

Yours sincerely,

Gavin Biles

Head of Retail Development – Urban Regeneration



Macarthur Women's Domestic Violence Court Advocacy Service

9th September, 2020.

TO WHOM IT MAY CONCERN.

Dear Sir/Madam,

This submission is a very brief outline on the concerns that the Local Housing Strategy by Campbelltown Council (2020) does not appear to have any consideration around the impacts of Domestic and Family Violence (D&FV) with a focus on housing.

Macarthur Women's Domestic Violence Court Advocacy Service (MWDVCAS) is one of 27 WDVCS' statewide that covers the Macarthur area. We are auspiced by Macarthur Legal Centre and the funding is administered by Legal Aid NSW. MWDVCAS has never had a decrease in clients with this service – in fact every six months numbers are increased significantly. Noted that the data below is for the whole of Macarthur, this service (alone) has the following:

January to June 2020:

Number of total clients: 1,694 (increase of 5% from previous six months);

Number of service events (everything done with/for client): 17,822 (an increase of 9% from the previous six months);

Number of Interim/Provisional Orders issued for our clients: 665 (an increase of 15% from previous six months);

Number of Final ADVO's issued for our clients: 306 (an increase of 7% - even over the Covid-19 period where court matters were changed dramatically);

Number of total clients case managed (ie: complex clients): 883

Number of Aboriginal clients: 164

Number of Multicultural clients: 466

Number of clients with a Disability: 349

Number of referrals from Police (directly) through the Central Referral Point (CRP) under Safer Pathway: 2,521 (an increase of 10.5% from January to June 2019 comparison).

It is acknowledged that the above data reflects all of Macarthur. However, a significant portion of our clients are in the Campbelltown LGA.

As is well documented D&FV is a significant issue in the Campbelltown LGA. The most recent BOCSAR report (June 2020) showed that in relation to Breach ADVO (Apprehended Domestic Violence Orders) the Campbelltown Police Area Command (PAC) had over a 2 year trend an increase of 19.3%. This is significant and shows two strong points:

1. Victims of D&FV (women) are feeling comfortable and confident to report Breaches of their ADVO to Police and Police are acting on those reports;
2. Police are very present in compliance of ADVO's and policing generally of Breach ADVO's.

.../2

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Auspiced by



Funded by



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While the Local Housing Strategy has a significant amount of data reflecting community groups, transport, social infrastructure etc. there appears to be no recognition of the issue of D&FV. A search of the document with "Domestic Violence" returns no results.

One of the biggest issues seen by MWDVCAS and all DFV Specialist Services in Campbelltown is that of accommodation. It is submitted that all community groups highlighted in this Strategy are clients of this service (females). Housing is an almost daily issue for the key D&FV service providers in this area.

If the vision is for "sustainable, high quality housing options to meet the diverse accommodation needs of the local community and future population growth" – then why is D&FV not considered in this at any point?

How would Campbelltown Council expect to support one of the most vulnerable groups in the LGA – that of women dealing with the complexities of D&FV with one of the most key needs – housing and accommodation?

If there is an expected projection over the next two decades then there must be consideration for supporting vulnerable community members with housing. Campbelltown Council can have a key role in this by ensuring that there is affordable, safe and adequate housing options for women leaving D&FV.

It is submitted that without this consideration Campbelltown Council is not "meeting the needs of the future population noting up to 36,000 additional dwellings may be needed by 2036." It is also submitted that without this consideration Campbelltown Council is not providing "for housing that meets the needs of all households".
How can that be done if there is no consideration in the strategy at all for D&FV?

Currently our clients struggle to find affordable rental properties. With continued growth, more expensive housing, developments for housing etc. the realistic cost of a property will be higher. If the house costs more to build, then the house costs more to rent out. A key consideration with Campbelltown Council – specific to D&FV – is how they manage and support affordability for (potentially) lower income families to rent a house.

It is disappointing that there has been no consultation that this service – nor other DV specialist services – are aware of that are specific to victims of D&FV.

It is disappointing that one of the biggest impacts economically and with health ie: Domestic and Family Violence – is not considered in this Strategy.

Enabling women to find affordable accommodation allows them to focus on other needs such as :

- Employment,
- Further education,
- Wellbeing – both psychological and physical health;
- Supporting their children.

This – in turn – contributes to families gaining employment, having money to put back into the local community and a safe and healthy family dynamic.

MWDVCAS submit that there needs to be significant consultation and discussions with the stakeholders in the Campbelltown LGA who support victims of Domestic and Family Violence – including mainstream services, Aboriginal services, Multicultural services, Disability services and Youth services. This important group - that is already vulnerable - have no voice in a Strategy that directly impacts them.

Tanya Whitehouse OAM
Manager

From: Stacey Miers
Sent: Wednesday, 16 September 2020 1:52 PM
To: Jeff Burton ; Shelter Admin
; Council >
Cc: John Engeler ; David Smith
>
Subject: RE: Draft Campbelltown Housing Strategy - request for extension on submission

Hi, Jeff, I tried to ring you but I couldn't get through. I have quickly put together some comments which are outlined in the Table below from Shelter NSW re your Draft housing strategy. I hope these are helpful. Your Stacey

About Shelter NSW

Shelter NSW was established in 1975, as the NSW State Housing peak body to advocate for better housing outcomes in response to urban and regional redevelopment pressures. We grew from this to now representing the interests of a diverse network of partners and members who include organisations and individuals that share our vision of a secure home for all NSW residents. We pursue this vision through critical engagement with policy and collaborative leadership initiatives.

Shelter NSW Comments on your Draft Housing Strategy

Shelter NSW has provided the following comments for Council draft housing strategy. In situations where Shelter NSW suggestions go beyond the direct control of the Council, we are happy to collaborate on any future advocacy-based actions.

Maintain and encourage housing supply in the right locations.

Shelter NSW sees basing new residential developments on clustering dwelling patterns as one way to deliver healthier long-term housing outcomes that improve the social connection for both older and younger residents. It also has the benefit of reducing the impact of climate change and natural hazards.

Shelter NSW Recommendations

Maintain and encourage housing supply in the right locations

The following recommendations aim to support the delivery of homes that meet the needs of younger residents and deliver alternative housing options for older residents to age in place:

- increase housing choice in the form of more townhouses, villas and apartments connected to existing centres and essential infrastructure,
- deliver infill development that aims to revitalise established residential areas,
- close the mismatch between current and future housing needs by supporting ways to deliver seniors housing in locations close to town and village centres (taking into consideration land and environmental constraints)
- aim to deliver more housing diversity as part of any CBD or 'town centre' master planning process,
- introduce more medium-density (R3) zones within town centres.

Recognise affordable housing (including public and community housing) as essential infrastructure

We would also encourage the Council to support the recognition of affordable housing (including public and community housing) as essential infrastructure in any future planning document (This definition is from the Australian Infrastructure Audit 2019). This recognition acknowledges the essential relationship between infrastructure, jobs, services, open space, public transport and affordable housing supply.

Diversify housing type and tenure across the LGA to provide for a range of housing needs.

Shelter NSW Recommendations

Low Rise Housing Diversity Code

Shelter NSW feels that some of the housing products in the NSW Government new 'Low Rise Housing Diversity Code' has the capacity to delivering extra housing choice and diversity. However, Shelter is concerned that several requirements in the 'Code' disincentivise the provision of different housing products.

Some standards in the Code such as building height, maximum gross floor area, setback and landscaping requirements would make it hard to deliver many of these housing products in a regional main street setting. Furthermore, some of the standards would diminish the main street character of regional centres and be rejected by local communities.

One obvious example with the capacity to deliver more choice is the Manor Houses as it could potentially deliver smaller dwellings within a main street setting, catering to the needs of older and younger residents. However, the setback requirements are determined based on the two nearest residential buildings, which diminishes any opportunity to deliver Manor Houses in the main street environment.

In response Shelter NSW suggests that the Council approach the NSW Department of Planning, Industry and Environment to work on the development of a modified version of the 'Low Rise Housing Diversity Code'. Alternatively, Council could develop its strategic framework to support the delivery of alternative housing options.

Mandate bedroom Mix

The Council could also consider mandating for a proportion of new dwellings to have a certain number of bedrooms in strategic centres (for example, mandate for 10% of new dwellings in strategic centres to be one or two bedrooms).

Increase the availability of accessible and adaptable housing.

Shelter NSW Recommendations

Deliver accessible housing options

Shelter NSW suggests that the Council look at ways to deliver seniors housing options in locations close to the CBD and town centres (taking into consideration land and environmental constraints) to close the mismatch between current and future housing supply and the needs of older residents.

The Council develop guidelines to increase the provision of adaptable and accessible housing units in line with universal housing design principles
(<http://universaldesign.ie/What-is-Universal-Design/Definition-and-Overview>).

Increase the supply of affordable rental housing.

Shelter NSW Recommendations

Understanding the issue of Key workers and housing need in the era of Covid 19

Shelter NSW would like the Council to consider the role of 'key workers' and the delivery of affordable housing over the next few years through the economic disparities resulting from the Covid-19 pandemic.

The pandemic has highlighted the inequality between essential workers with secure employment and those without. We have seen the growth of a highly casualised workforce, and growth in insecure employment.

The impacts of Covid 19 will see an increasing need for many key workers without secure employment need access to affordable housing options over the coming years. Shelter recommends that any commitment in the Council Housing policy include the impact of Covid 19 and expand the definition of key worker to include the retail, hospitality public and private transport sectors.

Council make an explicit commitment to deliver affordable housing by seeking inclusion into SEPP 70 (Affordable Housing Contributions Scheme)

Some policies and instruments can be used to generate more affordable housing through the planning system and these are relevant to the Councils Local Housing Strategy. One is the NSW Department of Planning, Industry and Environment (DPIE) State Environmental Planning Policy No 70 (SEPP70) – Affordable Housing (Revised Schemes) which allows Councils in NSW to use the inclusionary zoning provisions available in the Environmental Planning and Assessment Act 1979.

SEPP 70 allows affordable housing units to be acquired via a local housing strategy. This usually includes that specify areas undergoing redevelopment or master planning processes identify where an affordable housing contribution scheme can be applied. The following the Councils have been included into SEPP70 and they all provide good examples of a SEPP 70 delivery framework; City of Sydney, Willoughby, Randwick, Inner West, Northern Beaches, Ryde and Canada Bay.

SEPP 70 is the primary tool in NSW for delivering new affordable housing products via the planning system and as such Shelter NSW suggests that the Council seek approval for inclusion into the SEPP.

Affordable Housing Contribution Rate

Shelter NSW suggests that as part any SEPP 70 framework that the Council has an affordable housing contribution rate for both residential and non-residential land use zones. This is the case with the City of Sydney who has the following:

- Residential development
- On-site: 3% of the total residential floor area must be provided as affordable housing.
- Monetary: \$214.17 per square metre of the total residential floor area.
- Non-residential development
- On-site: 1% of the total non-residential floor area must be provided as affordable housing.
- Monetary: \$71.36 per square metre of the total non-residential floor area.

Planning Agreement Framework to Include Affordable Housing

An additional framework to deliver affordable housing is to include a provision to provide affordable housing in the Councils' Planning Agreement framework. This allows the Council to acquire a community contribution in the form of affordable housing on major development sites or masterplans.

The benefits of having a planning agreement system are that it can often take years for the Council affordable housing scheme to be outlined and adopted as part of its LEP and then included into SEPP70. To address this issue, Shelter NSW suggests that a complementary planning agreement framework in place capture uplift and deliver affordable housing in the meantime.

Two best practice planning agreement policy options are provided below:

1. Canterbury Bankstown draft Planning Agreement Policy has the following clause. Where a Planning Proposal is seeking an uplift of residential floor space that exceeds 1,000 sqm of gross floor area (as defined in the applicable local environmental plan), the equivalent of at least 5 percent of the increased residential floor space should be dedicated to the Council in the form of residential dwellings for affordable housing, or as a cash payment for affordable housing.
2. Randwick The Council:
https://www.randwick.nsw.gov.au/__data/assets/pdf_file/0007/25990/Planning-Agreements-Policy.pdf.

Council develop an Affordable rental housing target for the LGA

Shelter NSW suggests that the Council set a broad affordable housing target that's around 15% of all housing stock. This could then be broken down by, affordable, community, and public housing. One example of this is The City of Sydney Council [Sustainable Sydney 2030](#) report which establishes the following targets by 2030, 7.5% of all housing in the local area will be social housing provided by the government and community providers, and 7.5% will be affordable housing delivered by not-for-profit or other providers.

Incentives to organisation or authorities that deliver affordable housing in perpetuity

Council considers including in its local housing strategy the following incentives to organisation or authorities that deliver affordable housing in perpetuity: a fast track DA process, fee reduction or waiver, density bonus, car parking reduction bonus, waving or varying s7.11 contributions. We recommend that any incentives be targeted at public housing or not-for-profit developers (CHPs), linked to the affordable housing being secured in perpetuity, not for a minimum of ten years.

Analyse and update data related to affordable housing

Shelter NSW recommends that the Council also track any affordable housing approvals to enable a clear understanding of what type of affordable housing is being delivered across the LGA. This will enable the Council to respond proactively to the needs of its communities and any losses or increases in housing stock for lower income households in housing need.

Acknowledge and Support for Local Aboriginal Land the Council to delivery additional housing opportunities

Shelter NSW would like to see a commitment by the Council to work with the Local Aboriginal Land the Council on the development of a strategic plan for their landholders aimed at supporting the delivery of additional housing opportunities.

The primary aim would be to support additional housing opportunities and appropriate housing design outcomes on Aboriginal owned land. This work can be based on the Aboriginal Land Framework (introduced by the NSW Planning System in 2019). Proposed Actions:

- work cooperatively with LALC to rezone land so that it can be used for additional social housing.
- explore ways to support secondary dwellings/granny flat accommodation on existing Aboriginal/social housing lots.
- encourage the construction of additional Aboriginal social housing stock so that the underutilisation of existing housing and essential service can be addressed.
- work with public, community and Aboriginal housing providers to ensure dwellings are adequately maintained to improve the survivability of structures under bushfire or drought threat.

Crown Land and Opportunities to deliver Affordable housing

The NSW Government is currently undertaking a State Strategic Plan- A Vision for Crown Land review. We are aware that many NSW Councils have a strong view on the management and transfer of Crown lands. However, we would encourage the Council to work with the Crown Land Authority to deliver affordable housing projects across the Newcastle LGA.

Protection and Support for residents in Land Lease communities

Due to housing affordability issues, many residents who don't own a home and can't access public housing live in Residential land lease communities such as residential parks, caravan parks, manufactured home estates.

As pointed out by the Tenants' Union of NSW (TU) review of the Residential (Land Lease) Communities in 2017, many of the reforms failed to deliver protections for tenants or owners in these communities.

Many of the following matters impact the people who live in these communities:

- A lack of an effective compliance regime and site agreement fees set at unfair market values,
- Overcharging on utility usage,
- Site maintenance and repair costs being passed on to dwelling owners, despite the repairs being part of essential infrastructure,
- Other matters, such as the value of homes, decrease due to discriminatory

agreement terms.

In light of the matters outlined above we suggest that the Council include these communities in its housing strategy and that the Council aim to ensure that land lease (Caravan or mobile home park) managers or owners are encouraged to address the following matters:

- strict compliance and enforcement based on fair and transparent standards,
- encourage the introduction of minimum energy efficiency standards,
- support the introduction of fixed-term leases as opposed to the periodic agreement.
- encourage fair and transparent water management practises and chargers.

Ensure new housing and changes to existing housing reflect the desired future local character of the area.

Shelter NSW Recommendations

Maintain Local Built Form Character Through Best Practice Design Outcomes

To ensure that any new, infill or residential developments enhance the existing build form of regional cities, main streets and town centres, Shelter NSW recommends the Council develop local character assessment requirements that include particular design elements, for its DCP and Master plans proposals. In line with this initiative, we suggest that Council might like to review the following two documents; 'Implementing Good Design' and Evaluating Good Design (2018) by NSW Governments Architect (<https://www.governmentarchitect.nsw.gov.au/guidance/implementing-good-design>)

Homes are designed on ecologically sustainable principles.

Shelter NSW Recommendations

Housing Development that builds Resilient to Climate Change Impacts

In line with the stated strategies and objectives, we suggest that Council encourage clustered development patterns to consolidate landscaping and vegetation, reduce the risk of bushfire/floods and facilitating the delivery of better water management practices. Connected to these consolidation initiatives we recommend that new residential fringe or semiurban release development areas be based on the General Residential (R1) zones combined with bush fire and flood management criteria as opposed to Low-Density residential subdivision zones

Reducing climate change impacts

To build resilience to the changing climate, Shelter NSW suggest that Council and the NSW Government work together particularly in regional NSW, to deliver green landscape spaces in regional towns combined with an active tree planting and employment initiatives.

Stacey Miers Principal Project Officer
 Level 1, 241 Castlereagh Street, Sydney NSW 2000
 Email:
 Tel:
www.shelternsw.org.au | [Facebook](#) | [Twitter](#)

Submission: Draft Campbelltown Local Housing Strategy

Hi,

A Draft Campbelltown Local Housing Strategy feedback form has been submitted.

Attached is the detailed response or supporting documentation:

Question	Response
What do you think of the LHS	
Is your submission/feedback?	Supportive
Please enter your submission	I support the growth of Campbelltown cause I understand Sydney CBD is just getting over populated. But what my concern is the approval process. If now the council is taking 4 months for housing approvals how long will they take when the Campbelltown population doubles?
Please attach your submission	
Given name	Robert
	I have read and understood the privacy statement noted above.
Surname	Moreno
Email address	!
Phone number - Business hours	



10th September 2020

City Development - Draft Local Housing Strategy
Campbelltown City Council
PO Box 57
Campbelltown NSW 2560

Attn: Jeff Burton

council@campbelltown.nsw.gov.au

Dear Sir

RE: SUBMISSION TO CAMPBELLTOWNS DRAFT LOCAL HOUSING STRATEGY

School Infrastructure NSW (SINSW), as part of the Department of Education (DoE), welcomes the opportunity to provide comment on the Campbelltown draft Local Housing Strategy.

Population Growth

The Draft Strategy notes that the Department of Planning Industry and Environment's (DPIE) population projections forecast a population of approximately 227,946 for the Campbelltown Local Government Area (LGA) by 2036. This represents a 41 per cent increase in the population from 2016.

SINSW notes that the LGA currently has capacity for 42,250 additional dwellings. Many of these will be accommodated within the Greater Macarthur Priority Growth Area, which has an estimated dwelling capacity of 18,050 dwellings. Greenfield release areas including Menangle Park and Gilead will provide 19,000 dwellings, whilst approximately 2,700 infill opportunities are available in established areas such as Maryfields and Blairmount.

Population growth in the above locations is anticipated to affect the future student population of the following schools, which are located or have intake areas within the precincts:

Area	Dwelling Potential	Affected Schools
Campbelltown	3,600 dwellings	<ul style="list-style-type: none"> • Campbelltown Public School (PS) • Campbelltown East PS • Campbelltown North PS • Campbelltown Performing Arts High School (HS) • Lomandra School • Beverley Park School • Blairmount PS • Eagle Vale HS
Macarthur	4,650 dwellings	<ul style="list-style-type: none"> • Thomas Reddal HS • Ambarvale PS



		<ul style="list-style-type: none"> • Bradbury PS
Glenfield	2,800 - 3,500 dwellings	<ul style="list-style-type: none"> • Hurlstone Agricultural HS • Glenfield PS • Glenwood PS • Casula HS • Guise PS • Curran PS
Macquarie Fields	300 dwellings	<ul style="list-style-type: none"> • Macquarie Fields PS • James Meehan HS
Ingleburn	1,000 - 3,200 dwellings	<ul style="list-style-type: none"> • Ingleburn PS • Ingleburn HS • Sackville Street PS
Minto	360 dwellings	<ul style="list-style-type: none"> • Minto PS • Passfield Park School • Sarah Redfern PS • Sarah Redfern HS • The Grange PS • Campbellfield PS
Leumeah	1000 dwellings	<ul style="list-style-type: none"> • Leumeah PS • Leumeah HS
Menangle Park	4,000 dwellings	<ul style="list-style-type: none"> • Potential flow on effects to Rosemeadow PS, Thomas Acres PS and Mary Brooksbank School
Gilead	15,000 dwellings	<ul style="list-style-type: none"> • Potential flow on effects to St Helens PS, Rosemeadow PS

SINSW has determined that a combination of asset improvement and non-asset solutions across multiple schools will likely be required to accommodate the projected enrolment demand, these may include:

- Intake area (catchment) boundary changes
- Additional temporary and permanent teaching spaces on existing school sites
- Upgrades to existing schools
- Additional school sites

SINSW is committed to working with Council to ensure that public schools are supporting community needs and continue to be appropriately resourced to respond to changes to its student population. As such, SINSW requests that consultation between SINSW and Council occurs before the finalisation of future strategic directions and planning proposals that propose higher density residential development within the Campbelltown LGA. This is to ensure appropriate resourcing is provided for public schools to respond to all new population projections.



Traffic Impacts and Sustainable Travel

Increased growth will also place further pressure on the existing transport networks. As a result, it is essential that all modes of travel throughout the LGA are catered for. SINSW is therefore supportive of various actions that seek to deliver opportunities for greater active and public transport opportunities. SINSW recommends that the proposal consider the following actions to encourage and promote active and sustainable travel:

- Provide new and upgraded footpaths supported with lighting and way-finding, particularly to local bus stops where schools have a large enrolment boundary and to the 1.6 km SSTS (Student Subsidy Transport Scheme) exclusion zone for schools with a small enrolment catchment
- Provide additional pram ramps, bus shelters, kerb outstands, refuges crossings, particularly around schools
- Provide new and upgraded Shared User Paths and scooter / bicycle parking, particularly around schools where a majority of students live outside a 15 minute walk catchment
- Implement lower vehicle speeds around sensitive land-uses, including schools
- Implement local area traffic calming, particularly around schools
- Improve pedestrian access to bus stop access and higher bus priority on roads to decrease bus journey times. This includes for school buses
- Provide bus shelters for departure bus stops adjacent to schools

Infrastructure Contributions

The draft strategy recommends 'revisiting the development contributions approach' for the Glenfield to Macarthur Urban Renewal Corridor, to ensure the works proposed align with the infrastructure needs of the local population. SINSW notes that Educational Establishments are currently subject to a Section 7.12 levy under the *Campbelltown Local Infrastructure Plan 2018*.

SINSW is supportive of updating the local contributions framework, though recommends that any potential future local contribution plan/s for the LGA consider the following:

- An exemption for public schools. This request is sought on the basis DoE, in conjunction with SINSW, provides essential social infrastructure for the direct benefit of the local Campbelltown community
- Requirements for public domain, transport and other infrastructure works required to support public schools in the Campbelltown LGA
- The collection of specific contributions from new residential developments surrounding public schools and key residential sites in the LGA. This is to support future public school upgrades

Should you require further information about this submission, please contact
Lincoln Lawler at or Katie Weaver at



Yours Sincerely,

Alix Carpenter
Director - Statutory Planning



Anoulack Chanthivong MP

MEMBER FOR MACQUARIE FIELDS

The General Manager
Campbelltown City Council
PO Box 57
CAMPBELLTOWN NSW 2560

7 September 2020

Submission re Campbelltown Local Housing Strategy

Dear Lindy,

I write in relation to the public exhibition of the Campbelltown Local Housing Strategy (LHS) and make the following comments.

I understand the LHS is based on housing targets and mandates set by the NSW Liberal Government. However, I would expect Council and Councillors to stand up for what's best for our local community, not simply rubber-stamp overdevelopment plans.

Council wrote to me on 6 February 2020 to take the stance that Councillors should be more involved in the decision-making process for development applications, advocating for changes to current planning regulations to better reflect the role of Councillors as community advocates.

It would have been encouraging to see Council and Councillors commit to their roles as community advocates by not blindly following housing targets dictated by the Liberal Government. In fact, the LHS process could have been used as the catalyst for Council to defend our local area against the Liberal Government's plans for drastic densification.

Overdevelopment is a significant problem in our City. Inappropriate planning decision and housing targets – without significant investment in supporting infrastructure – will only lead to congestion, overcrowding and destruction of our suburban character and green open spaces.

I encourage Council to edit the LHS to identify specific infrastructure needed to accommodate the draconian housing targets set by the NSW Liberal Government and push for funded commitments before implementing changes to local development plans.

Unfortunately, the "planned infrastructure" listed in section 8.4 of the LHS is inadequate. Where are the new roads and upgrades, parking facilities, schools and classrooms required

1

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Website: www.letsbackanoulack.com

to accommodate such growth? It would be a mistake to greenlight a major push to densification and then play catch-up with infrastructure.

It is imperative Council champions the needs of the local community instead of submitting to the NSW Liberal Government's unfair overdevelopment edicts that will irreversibly change our local suburbs and their much-valued character.

I believe the most positive part of the LHS is Council's commitment to limiting residential growth to within the urban growth boundary, thereby seemingly ensuring the protection of the Scenic Hills.

However, the level of development to be allowed within the urban growth boundary is problematic.

Page 59 states: "A key requirement of this LHS is to ensure that housing growth does not compromise this rural character element of the LGA, in part represented by its picturesque setting and high value heritage and natural environments".

Whilst I agree with the sentiment above, the implementation of the LHS will inevitably compromise the rural character of the LGA. The juxtaposition of the rural landscape and high-rise development along the rail corridor will ruin the character that local residents value about the LGA.

Council's own community survey, detailed in Section 7 of the LHS – makes it clear that residents value our suburban character not high-density.

I wish to make comments and ask questions in relation to the following specific aspects of the LHS:

1. Page 11 states: "New housing will support a self-reliant growing population and be strategically located to support businesses and employment in commercial centres". What is meant by self-reliant in this context?
2. Page 11 states: "New housing will contribute to liveable neighbourhoods that encourage the community to interact in a walkable, high amenity and urban environment". How does Council define "liveable" and "high amenity"?
3. Page 66 lists the following opportunity under 'Urban form and liveability': "Support the health and wellbeing through healthy urban design and inclusive design". What is meant by "healthy urban design"?
4. Page 66 lists the following opportunity under 'Employment centres': "Aligning residential development with employment centres in accordance with the employment lands strategy to support local employment and the 30-minute city". What is the status of the employment lands strategy?

I make the comment that a comprehensive jobs strategy is needed to ensure sufficient employment opportunities to support a growing community. It is not enough to simply state that more dwellings will result in more jobs. The focus should be on long-term and more permanent employment opportunities.

5. Page 67 states: "The railway line can limit residential use due to noise impacts. Residential lands should not be planned in locations where [sic] mechanical ventilation is required to meet noise standards".
This statement is contradictory. The majority of the LHS supports growth along the rail corridor but the railway line is specifically identified as a constraint to development due to noise. I would appreciate clarity on this issue.
6. I wish to reiterate the need for Council to uphold the views and champion the needs of the community. Section 7 of the LHS makes it clear what the community wants, as evidenced below:

Page 120 states: "Analysis of sales data, while limited, suggests that detached, low-rise residential housing attracts the highest level of demand across the LGA".

Page 130 states: "Of those who would like to live in a different home, 83% per cent noted that home would be a single dwelling house".

Page 140 refers to residents valuing good street character and being near to open space as the most important factors when choosing where to live. Other popular factors included low traffic and congestion levels as well as a good sense of community.

I make the comment that the factors detailed below are likely to be negatively impacted by the densification of our suburbs, as advocated in the LHS.

Page 141 states: "When considering a dwelling to live in the respondents noted the most important thing, outside of cost, to influence their decision in the amount of private open space with 86 per cent of respondents including this in their top-five considerations".

I make the comment that private open space is not available in high-rise buildings.

Page 142 states: "The general interest in terraced housing and apartments was comparatively low". Similarly, page 142 also states: "However, a significant number of responses showed a strong negative sentiment to growth and densification. The respondents highly value existing green space and semi-rural/suburban character of the LGA with a desire for existing housing to be supported by better infrastructure before any additional housing is added. Numerous responses noted they did not know where there was opportunity for new housing in the existing urban area".

I make the comment that the majority of the LHS directly contravenes the views of the community. The prevalence of high-density living in the LHS is not supported by the stakeholder engagement carried out by Council.

How can Council justify the development plans suggested in the LHS when the community has made it clear high-density living is not what they want in the LGA?

7. Page 131 includes the following observation: "Design controls for the CBD area do not appear to align with market conditions".
What is meant by this observation? In what way do the design controls not align with market conditions?
8. Pages 131 and 209 make reference to parking requirements. Page 131 states: "Prescriptive controls, such as underground car parking, may increase cost and limit the viability of development". Page 209 details the proposed action: "Reduced parking requirements given proximity to rail station and introduction of shared car schemes such as GoGet".
The LHS, and subsequent Council planning documents, must not reduce parking requirements for development proposals.

An analysis of the GoGet website on 4 September 2020 showed the closest car sharing vehicle was located in Liverpool, with no vehicles available in Campbelltown.

How can Council justify a reduction in parking requirements based on flawed logic that shared car schemes are available locally when evidence suggests otherwise? Further, the reduction in parking requirements would only serve to economically advantage developers. As a result, local streets will be overtaken by the overflow of vehicles not accommodated by the high-density development. It is unsubstantiated that residents in our local area do not use motor vehicles because they live in apartments.

9. Page 164 includes the 'suggested action' in relation to the Campbelltown CBD: "The potential to negotiate increased floor space as part of voluntary planning agreements".
I am concerned that this suggested action will result in Council and developers ignoring the development controls that are in place to try to protect the character of the area.
If Council allows for development controls to be 'negotiated' in the CBD, what is to stop developers expecting the same treatment throughout the LGA?
10. Page 194 relates to the introduction of local character statements. I note that a report to Council's extraordinary meeting on 30 October 2018 noted that local character statements would be produced and utilised for urban renewal and land release areas "to provide the foundation for the planning policies that would in turn guide transforming the built environment into areas that would respond to the daily needs of the residents".

Can Council provide an update on progress made in relation to local character statements in the almost two years since the October 2018 report was presented to Councillors?

Given the October 2018 report stated that "Character statements will also serve to identify areas where the current character is one that needs to be protected" – finalising local character statements should have been Council's first priority when the LHS.

Omitting local character statements from the LHS process is short-sighted and can only be detrimental for local communities.

In finalising my submission, it appears the purpose of the LHS is to rehash and commit to the multitude of NSW Liberal Government planning policies already in place such as the Western City District Plan, Greater Sydney Region Plan, Glenfield to Macarthur Urban Renewal Corridor Strategy and Greater Macarthur 2040.

I reiterate the need for Council to serve the best interests of the local community. Increased densification, and the resulting congestion and overcrowding, is not what our community wants or deserves.

Communities, and Councils, do not need to simply sit back and accept the overdevelopment agenda of the NSW Liberal Government. In fact, just recently opposition to NSW Government planning controls resulted in development plans in North Sydney being scaled back due to community concerns¹.

I encourage Council and Councillors to embrace their role as community advocates and stand up for our local residents. Our City has already had to bear the brunt of overdevelopment. It is time to push back against the NSW Liberal Government's plan for densification. Unfortunately the current LHS merely endorses unsustainable housing targets that will have a detrimental impact on our community.

Yours sincerely,

Anoulack Chanthivong MP
Member for Macquarie Fields

¹ <https://www.smh.com.au/national/nsw/development-plans-for-sydney-s-north-shore-scaled-back-after-outcry-20200828-p55a9w.html>

HYS - Draft Campbelltown Local Housing Strategy

Submission date: 9 September 2020, 9:22AM

Receipt number: 2

Related form version: 3

Question	Response
What do you think of the LHS	
Is your submission/feedback?	Supportive

Please enter your submission	<p>I regard the document very informative and helpful for the future planning of Housing in Campbelltown.</p> <p>I support many of the goals and actions listed, in particular the encouragement of high density housing around all railway station but in particular around both sides of Campbelltown, Macarthur and Leumeah Stations forming the CBD.</p> <p>Large car parking in each of these areas occupy valuable accessible sites for housing/commercial and these areas should be reevaluated as sites for potential housing and contributions considered for reconstruction as underground or multilevel parking.</p> <p>The area around the Macarthur station in particular as it is vacant, as close to the University, Hospital and major commercial and thus presents a unique opportunity as a multi use Housing/Civic/Cultural/Educational/commercial hub in the long term. However, planning and provision for a 30-40 year plan needs to start now otherwise the opportunity will be lost if short term plans are made.</p> <p>Contributions via Voluntary agreements, control planning, sect 94 and 95 and other means must be included to ensure provision of not a broad range of housing types and affordability, but also to provide for the cultural, civic, educational needs of the future population; and importantly also the provision of excellent pedestrian pathways and cycleways, and an efficient and convenient transport system, whether by light rail or trackless.</p> <p>Provision for planning of these major future facilities (Entertainment, Civic, Cultural, Sporting etc) and transport linkages to reduce car dependency (pedestrian, cycleways and public transport) should begin now not when constraints which occur with short term opportunities, make such provision far more difficult and expensive.</p> <p>The area around</p>
Please attach your submission	

	I have read and understood the privacy statement noted above.
Given name	Mario
Surname	Majarich
Email address	
Phone number - Business hours	

HYS - Draft Campbelltown Local Housing Strategy

Submission date: 9 September 2020, 5:49PM

Receipt number: 3

Related form version: 3

Question	Response
What do you think of the LHS	
Is your submission/feedback?	Neutral
Please enter your submission	This submission is a very brief outline on the concerns of no consideration of Domestic Violence.
Please attach your submission	Ctown Council Local Housing Strategy_2020.pdf
	I have read and understood the privacy statement noted above.
Given name	Tanya
Surname	Whitehouse
Email address	
Phone number - Business hours	



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Parramatta NSW 2150
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ABN 21 147 934 787

9 September 2020

General Manager
Campbelltown City Council
PO Box 57
CAMPBELLTOWN NSW 2560

Contact: *Stuart Little*
Telephone:
Our ref: *D2020/94926*

Dear Sir/Madam,

RE: Draft Campbelltown Local Housing Strategy

I refer to the public exhibition of the draft Campbelltown Local Housing Strategy that examines the housing needs of Campbelltown's current and future residents, and seeks to manage sustainable housing growth across the local government area (LGA) to 2036.

WaterNSW is particularly interested in the Strategy as the Upper Canal Corridor traverses the western part of Council's LGA (Attachment 1), conveying bulk water from Pheasants Nest and Broughton Pass Weirs through to the Prospect Water Filtration Plant and Prospect Reservoir. The Upper Canal Corridor is a Controlled Area declared under the *Water NSW Act 2014* and *Water NSW Regulation 2020*, and public access is prohibited. We understand that most of the new housing stock required to accommodate Campbelltown's growing population will be accommodated in the Greater Macarthur Priority Growth Area, including Menangle Park and Gilead. The Housing Strategy will therefore place significant development pressure on the Canal.

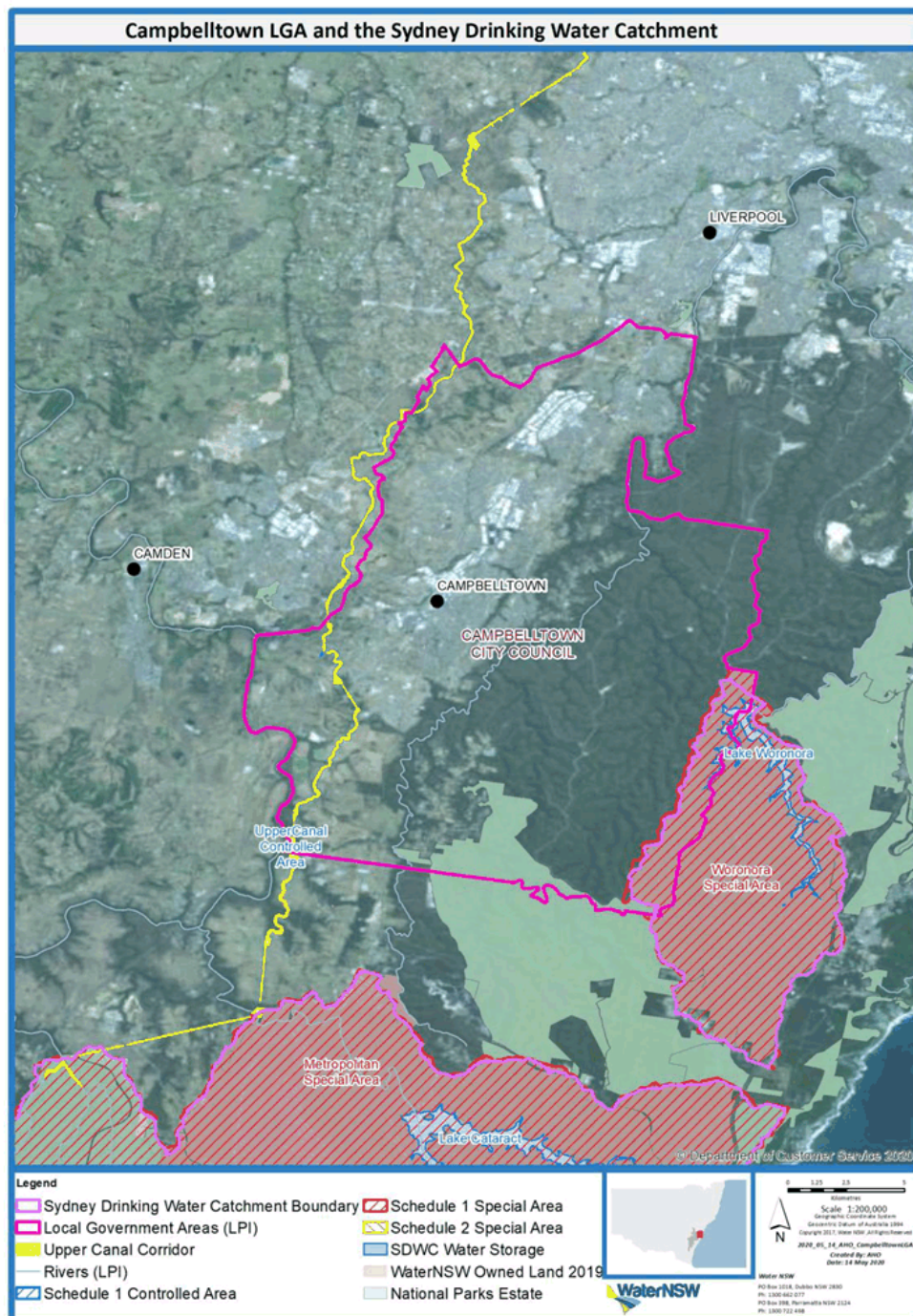
It is a priority for WaterNSW to operate the Upper Canal infrastructure efficiently and effectively and with minimal risk of illegal trespass or contamination to the open waters. It is therefore important that new housing development be set back from the Corridor and buffered by public open space, perimeter roads or road reserve. Further information on the Upper Canal corridor can be found on the Water NSW website, and in the WaterNSW publication [*Guidelines for development adjacent to the Upper Canal and Warragamba Pipelines*](#).

About 1,170 ha of the Campbelltown LGA also overlaps with the Sydney Drinking Water Catchment. This includes part of the Woronora Special Area and Lake Woronora water storage area in the south-east of the LGA which are owned and managed by WaterNSW. These areas are designed as Schedule 1 Special Area under the *Water NSW Act 2014* and *Water NSW Regulation 2020*. Both the Upper Canal and Lake Woronora (forming part of the item known as 'Woronora Dam') have State Heritage significance and are listed under Schedule 5 of the Campbelltown Local Environmental Plan (LEP).

Additional comments on the draft Strategy are provide in Attachment 2. If you have any questions regarding the issues raised in this letter, please contact Stuart Little at

Yours sincerely

CLAY PRESHAW
Manager Catchment Protection

ATTACHMENT 1

ATTACHMENT 2 – Additional Comments

The draft Housing Strategy does not currently refer to the Sydney Drinking Water Catchment, Woronora Special Area, or Upper Canal Corridor. The Strategy would benefit by:

- including in section 3.6.3 Natural Environment, that the Woronora Special Area occurs in the east of the LGA (as well as Australian Defence force base at Holsworthy and Dharawal National Park as currently stated)
- adding the Upper Canal (water supply) Corridor under the subheading 'Incompatible uses' of the Opportunities and Constraints Table (Table 6; page 67). The Canal corridor acts as a boundary to development and should be buffered by public space, perimeter roads or road reserve
- adding the Woronora Special Area in the east of the LGA (as well as Australian Defence force base at Holsworthy and Dharawal National Park) under the subheading 'Conservation Resources' of the Opportunities and Constraints Table (Table 6; page 67), and
- clarifying the land covered by the 'Visual and Landscape Analysis of Campbelltown's Scenic Hills and the East Edge Scenic Protection Lands'. This term is referenced on page 67 as a constraint to Conservation resources. It is also referred to with respect to bushfire risk on page 63. It would be useful if a map of these lands was provided to understand the area of land operating as a development constraint. It is unclear whether these lands include the Woronora Special Area within the Sydney Drinking Water Catchment.

A summary of the Planning Proposals that have proceeded past the initial review stage since review 25 June 2014 is presented in Table 14 (pp. 100-101). This 'Planning Proposal Pipeline' identifies that nine Planning Proposals are at pre-exhibition or being assessed by DPIE and that 11 have been approved by Minister. Our examination of the LEP Tracker (27 August 2020) identifies 25 Planning Proposals have arisen since 25 June 2014. Importantly, the summary table appears to be missing reference to the Planning Proposals for Menangle Park (1,850 dwellings, 2,700 jobs) and Gilead Stage 1 (1,700 jobs). Consequently, the figure of 5,700 dwellings (p.102) seems to be an underestimate of the urban development pressure likely to be experienced by Campbelltown due to the Planning Proposal Pathway. These sections of the report warrant updating.

The dwelling capacity of the Campbelltown LGA is presented in Table 33 (pp.157-158). This includes dwelling estimates reliant on Planning Proposals for rezoning as well as lands that are already rezoned, not requiring rezoning, or under development. Table 33 estimates 15,000 dwellings for Gilead. It also states that the land was rezoned in 2017 to provide 1,700 lots. Given the disparity of these two totals, greater explanation is required how the figure of 15,000 dwellings has been estimated. For many suburbs, the dwelling capacity estimates also do not align with the explanatory text given in this table. Also, even taking in account that Table 33 includes land that has been rezoned or doesn't require rezoning, there is a significant difference between the 5,700 dwellings provided by recent Planning Proposals (Table 14) and the 42,250 dwelling capacity estimates provide in Table 33. Table 33 may benefit by more clearly stating the assumptions used in the table or the timeframe over which the dwellings are likely to arise.

The location information for housing growth for Menangle Park and Gilead (pp.184-188) would benefit by including maps of the proposed development or investigation areas. Such maps should also include the location of the Upper Canal Corridor so that this water supply infrastructure can be visible to developers and readers referring to the Strategy, and so it can be taken into account as a development constraint. Relevant spatial layers can be provided by WaterNSW if required.

Lot yield projections for Gilead may need to be revised given the recent 28 August 2020 listing of the Mount Gilead Estate on the State Heritage Register.



Ordinary Council Meeting

11/08/2020

8.2 Draft Local Housing Strategy - Public Exhibition

Reporting Officer

Executive Manager Urban Centres
City Development

Community Strategic Plan

Objective	Strategy
4 Outcome Four: A Successful City	4.3 - Responsibly manage growth and development, with respect for the environment, heritage and character of our city

Officer's Recommendation

1. That the draft Campbelltown Local Housing Strategy (attachment 1) be endorsed and placed on public exhibition for a period of 28 days.
2. That the outcome of the exhibition of the draft Campbelltown Local Housing Strategy be reported back to Council.

Purpose

The purpose of this report is to inform the Council of the draft Campbelltown Local Housing Strategy (draft Strategy), seek its endorsement of the draft Strategy and its approval to place the draft Strategy on public exhibition for a period of 28 days.

The preparation of the draft Strategy (attachment 1) is a required action of the Campbelltown Local Strategic Planning Statement (LSPS) and forms part of the suite of plans required to inform the review of Council's Local Environmental Plan 2015 (CLEP 2015).

History

Sydney Region Planning Framework

In March 2018, the NSW Government released the Greater Sydney Region Plan, A Metropolis of Three Cities (GSRP), which is built on a vision of three cities where most residents live within 30 minutes of their jobs, education, health facilities and services. The vision identifies three cities known as the Western, Central and Eastern Cities. The vision identifies goals and objectives for the three respective cities.

The GSRP has four key components that are in place to drive the three cities' vision including:

- Infrastructure and collaboration
- Liveability
- Productivity
- Sustainability

Five district plans were prepared to guide the implementation of the GSRP. Campbelltown falls under the Western City District Plan (WCDP).

The WCDP requires councils to develop housing strategies to deliver housing targets in the short, medium, and long-term housing growth. The following targets are provided:

- a) The delivery of five year (2016-2021) housing supply targets for the Campbelltown local government area of 6800 dwellings.
- b) The delivery of six to 10 year (when agreed) housing supply targets for each local government area.
- c) Capacity to contribute to the longer term 20 year strategic housing target for the Western City District of 184,500 dwellings.

The WCDP requires housing strategies to be prepared and given effect through a number of planning priorities and actions that Councils are required to undertake as part of the review of their Local Environmental Plans (LEPs). The approval of the LSPS by the Greater Sydney Commission, which came into effect on 31 March 2020, was an important first step in the LEP review process and has informed preparatory work on the draft Strategy.

Campbelltown Local Strategic Planning Statement

The LSPS came into effect on 31 March 2020, and provides planning priorities and actions for Council to align with Region and District planning initiatives and feedback from the local community on the future of the City of Campbelltown.

The following specific actions of the LSPS relate to the preparation of a draft Strategy for the Campbelltown LGA:

Action 2.1:

Develop a comprehensive Local Housing Strategy for the Campbelltown LGA that identifies and prioritises the areas for growth having regard to housing demand, growth trends, and the existing and likely future housing stock

Action 2.2:

Use the Local Housing Strategy to provide the evidence base for Campbelltown City's 10 and 20 year housing targets and dwelling mix, and to determine infrastructure capacity constraints and potential sequencing of housing delivery across the Campbelltown LGA.

The draft Strategy has been prepared in accordance with the above actions of the Campbelltown LSPS, and higher order requirements of the WCDP and GSRP. The Strategy will inform future reviews of the LSPS and the CLEP 2015. It will also assist in the future planning of the growth priority areas, urban renewal corridor and precincts in collaboration with Department of Planning, Industry Environment (DPIE) and the Greater Sydney Commission.

LEP Review - Timeline and Funding

Council has received funding under the Western Sydney City Deal to conduct an accelerated review of the CLEP 2015.

The preparation of a draft Strategy is required to inform further reviews of the CLEP 2015 by providing:

- An evidence based assessment of unique housing needs of Campbelltown current and future residents
- Recommendations for housing supply for projected population growth, including diversity and affordability
- Guidance on sustainable growth aligned with infrastructure capacity and provision
- Recommendations and actions for housing in the LGA, and inform review of Council's LSPS, LEP and DCP
- Guidance on the application of housing related actions from the LSPS
- Identifies policy positions and non-statutory planning actions to support the delivery of housing objectives and goals

As part of the LEP review funding process, the draft Strategy is required to be approved by Council and referred to the Greater Sydney Commission for finalisation by 30 September 2020.

Report

Introduction

The Local Housing Strategy is a housing review undertaken at local government level and has been prepared in accordance with regional and district planning framework, and the specific actions of the Campbelltown LSPS.

The draft Strategy (attachment 1) is an evidence based document and sets out the priorities and actions to deliver suitable housing in the right locations to meet the needs of the Campbelltown community over the next 20 years. It ensures that housing delivery protects local amenity and character, open space and ecological values and is aligned with infrastructure provision.

The draft Strategy has been prepared by Council with assistance by planning consultants Hill PDA, engaged by Council through an open tender process in early 2020. The drafting has included consideration of community feedback under the LSPS, early work undertaken on the Campbelltown Employment Lands Study, and has been informed by preliminary consultation with key community groups and stakeholders in the LGA.

The draft Strategy must be approved by Council and referred to the Greater Sydney Commission for its finalisation. Future planning proposals and policy amendments will be required to align with the outcomes of the final Local Housing Strategy.

Campbelltown Local Strategic Planning Statement

The LSPS was prepared to outline strategic planning priorities and actions for the Campbelltown LGA, and set out a 20 year vision for meeting the community's land use planning needs. The LSPS provides an overview of the characteristics and values of Campbelltown, a direction for growth, recommendations for revising planning controls, implementation pathways for the Region and District plans and identification of where further strategic planning is required.

The LSPS was endorsed by Council on 18 February 2020 and came into effect 31 March 2020 following approval by the Greater Sydney Commission. The preparation of the draft Strategy is a priority action for Campbelltown City Council under the directions of the LSPS to address housing supply and delivery.

The LSPS was informed by community consultation undertaken on the draft LSPS document in June and July 2019, as well as earlier consultation related to the Campbelltown Community Strategic Plan (CSP), and Reimagining Campbelltown CBD.

The LSPS has established the following strategic policy issues relevant to housing growth in the Campbelltown LGA for consideration under the draft Strategy:

- Contain urban growth within the existing urban area or within the identified priority growth and urban investigation areas
- Housing supply, diversity, choice and quality respond to community needs and contribute to housing requirements at the District level
- Inform the Affordable Rental Housing Target Schemes for development precincts
- Coordinate the planning and delivery of local and State infrastructure.

These LSPS outcomes have been considered in the preparation of the draft Strategy as outlined below. The housing strategy, once finalised, will inform the next review of the LSPS.

Draft Campbelltown Local Housing Strategy

The draft Campbelltown Local Housing Strategy (attachment 1) comprises four parts as outlined below.

Part 1 Introduction and Policy Context - Establishes the purpose of the Strategy and provides an overview of the Campbelltown LGA and the policy context.

Part 2 Evidence - Provides an overview of population and housing forecasts and drivers of change that will influence the future housing needs of the Campbelltown LGA.

Part 3 Planning Priorities - Provides planning priorities and a long-term strategy to meet the housing needs of our community, including specific objectives, actions and performance indicators.

Part 4 Implementation – Establishes a clear framework for planning for housing in the LGA, including urban renewal development and greenfield areas, and increasing housing diversity and choice.

When finalised, the Campbelltown Local Housing Strategy is intended to guide the delivery of housing across the LGA to 2036 by identifying anticipated housing needs of the current and future population, and setting out statutory planning measures to ensure the appropriate delivery of housing related outcomes.

The draft Strategy includes potential policy positions and non-statutory planning actions to support the delivery of the regional and district dwelling targets identified by the DPIE.

The key objectives of the draft Strategy are to:

- (a) Provide an evidence based assessment of the supply and demand of housing in the Campbelltown LGA, including consideration of demographic factors, housing trends, local land use opportunities and constraints, and infrastructure limitations.
- (b) Identify and respond to the constraints and opportunities for the delivery of new housing in the Campbelltown LGA having regard to the requirements of the Greater Sydney Region Plan and Western City District Plan.
- (c) Promotion of the efficient use of land and infrastructure by aligning housing growth with supporting infrastructure and social services, such as schools, health facilities and public transport.
- (d) Comply with the requirements of the Department of Planning, Industry and Environment's Local Housing Strategy Guidelines.

The key components of the draft Strategy to deliver the above objectives are summarised as follows:

- Provision of a clear plan that will direct housing delivery in the Campbelltown LGA over the next 20 years, and align with the relevant requirements of the Sydney Regional Plan, Western City District Plan, and Council's LSPS.
- Identification of the preferred sequencing of housing delivery in the LGA to achieve growth targets in an orderly and efficient manner, including identification of areas that would not be appropriate for new housing due to local constraints.
- Details of engagement undertaken with the community and relevant stakeholders to identify local housing needs and aspirations.
- Discussion of opportunities to deliver affordable and social housing outcomes to meet the needs of the community, including consideration of Affordable Rental Housing Target Schemes.
- Discussion of opportunities to deliver housing outcomes to meet the needs of students and seniors.
- Recommendations on local planning mechanisms that may be implemented by Council, including potential amendments to CLEP 2015, to facilitate the delivery of housing outcomes identified in the Strategy.

Preliminary Consultation

The draft Strategy has been prepared following preliminary consultation with the public and key stakeholder groups, summarised as follows:

- On Line Public Survey (May 2020). In total 138 responses to the survey were received, 114 of which were general public who accessed the survey via the Council website
- Targeted phone calls and meetings with key housing providers and community groups, including real estate agents, housing groups and social service agencies
- Internal Workshop with Council staff – 2 July 2020
- Councillor Briefing Session and Feedback – 28 July 2020

In addition to the above, the draft Strategy has been prepared having regard to previous feedback from residents from consultation undertaken on the LSPS, Reimagining Campbelltown, and the Community Strategic Plan as relevant to the future of housing in the Campbelltown LGA.

The key issues identified for housing provision in the Campbelltown LGA identified under the preliminary consultation process have informed the preparation of the draft Strategy, and are summarised as follows:

- Provision of affordable housing
- Provision of a diversity housing typologies
- Accessibility and inclusive design
- Preservation of scenic hills
- Protection and enhancement of rural residential land
- Protection of koala habitat and other general biodiversity matters
- Support for higher density and mixed use within walkable distance to train stations
- Protection of heritage assets through revitalisation and adaptive reuse
- Celebration of arts and culture
- Appropriate and accessible open spaces and sports and recreation facilities

Initial Findings of Evidence Assessment

The key findings from the evidence based review component of the drafting process for the draft Strategy are summarised follows:

- Campbelltown is expected to see a significant growth to 2041, particularly in school aged children and families increasing demand on education and social infrastructure.
- The synchronisation of residential growth with jobs and connectivity under the 30 minute city concept is an important requirement for sustainable growth.
- Glenfield to Macarthur urban renewal corridor is a key outcome for the Western City District Plan and will provide growth in areas with access to existing transport infrastructure. The six precinct plans include plans for increased density as well as employment and services lands with approximately 18,000 additional dwellings.

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- The growth areas to the south of Macarthur in Menangle Park and Gilead are expected to provide approximately 19,000 additional dwellings by 2036.
- Dwelling construction and completions in the Campbelltown LGA are trending to achieve the five year housing target (2016-2021) of 6800 dwellings under the WCDP.
- There is sufficient residential zoned greenfield land available in the Campbelltown LGA to replicate the five year housing target of 6800 dwellings under the WCDP for the rolling six to 10 year period (2021-2026), with identified housing capacity as follows:
 - Menangle Park (4000+ dwellings)
 - Glenfield (200 dwellings)
 - Bardia (800 dwellings)
 - Willowdale (1500 dwellings)
 - Claymore (250 dwellings)
 - Maryfields (650 dwellings)
 - Western Sydney University precinct (500 dwellings)
 - Airs (300 dwellings)

In addition to these locations, there are several other planning proposals progressing through the planning system which will provide additional housing capacity as follows:

- Campbelltown RSL (438 dwellings)
- 22-32 Queen St (750 dwellings)
- Ingleburn CBD (3240 dwellings)
- 26 Mercedes Road (12 dwellings)
- Removal of dwelling cap for three sites (400 additional dwellings)
- Evelyn St Macquarie Fields (28 dwellings)
- Kellicar Road Planning Proposal (1800 dwellings)
- Minto Urban Renewal Precinct (1500 dwellings)

All of this is in addition to the current capacity for infill development, eg secondary dwellings, which add to overall housing capacity.

- This strategy must use the DPIE population projections as per the WSDP however, alternate projections developed by Council for higher growth outcomes are also being considered within the strategy.
- Housing needs be a range of types, tenures and price points to cater for different stages of life and diversity of household types.
- Residential development needs to be supported by the timely provision of required infrastructure development.
- Housing affordability and availability is a key concern of the community.
- Future residential development should be focused in the existing urban settlement area and identified already growth centres to maintain and protect the scenic and environmental character of the area.

Affordable Rental Housing

Housing affordability includes the provisioning of affordably priced rental housing that meets the needs of very low to moderate income households. Affordable Rental Housing (ARH) dwellings are generally benchmarked at a maximum rental cost of 30 percent of gross household income to reduce 'rental stress'.

The draft Strategy identifies a number of opportunities for Campbelltown City Council to enable ARH development through a number of local and state planning mechanisms. This includes ARH targets for new development, potential contributions by developers, incentives for ARH under Councils LEP, as well as through voluntary planning agreements. The draft Strategy identifies these options for detailed investigation by Council under an Affordable Rental Housing Strategy for the Campbelltown LGA.

To assist this outcome, Council has partnered with other local Councils in the Western City Planning Partnership to collectively examine affordable housing demand, gap and cost analysis in the WCDP. This work is anticipated to be completed later this year and will provide the foundation for an affordable rental housing strategy for the Campbelltown LGA, and ensure a consistent and best practice approach across all Western Sydney Councils involved in the partnership.

The DPIE is also reviewing its policy framework in regards to housing affordability, housing diversity and affordable rental housing having just placed on exhibition an explanation of intended effect in regards to a proposed Housing Diversity SEPP. It is proposed that the new Housing Diversity SEPP will:

1. Introduce new definitions for student housing, build-to-rent housing and co-living.
2. Amend some state-level provisions, particularly for boarding house and seniors housing development.
3. Amend some state-level planning provisions to support social housing developments undertaken by the NSW Land and Housing Corporation (LAHC) on government-owned land; and
4. Consolidate three housing-related SEPPs being:
 - State Environmental Planning Policy No. 70 Affordable Housing (Revised Schemes)
 - State Environmental Planning Policy (Affordable Rental Housing) 2009
 - State Environmental Planning Policy (Housing for Seniors and People with a Disability) 2004

Notwithstanding the above most recent policy movement by the DPIE, the draft Campbelltown Local Housing Strategy needs to be completed despite the exhibition of the explanation of intended effect. If the changes proposed in the explanation of intended effect are made in the future by the DPIE then they will need to be incorporated in future reviews of the draft Strategy.

Reimagining Campbelltown

The draft Strategy has been prepared using the evidence base prepared for the Reimagining Campbelltown City Centre Master Plan (RCCCMP). The draft Strategy applies to the whole LGA, whereas the RCCCMP only applies to the City Centre.

The City Centre will play an important part in the future accommodation of housing diversity and affordability. City centre living opportunities will provide for a range of apartment sizes from studio apartments, through to larger apartments with 3 or more bedrooms, with the proportion of the same moving with the City Centres identified demographic needs.

The draft Strategy is considered to be consistent with the RCCCMP.

Campbelltown Residential Development Strategy 2014

The Campbelltown Residential Development Strategy 2014, was used to inform the preparation of the CLEP 2015 and has been used since as a reference document when assessing planning proposals. It is intended the draft Strategy once adopted would replace the Residential Development Strategy 2014.

Public Exhibition

It is proposed to publicly exhibit the draft Strategy for comment for a period of 28 days.

Any comments received during the community consultation period will be considered in a final review of the draft Strategy and reported back to the Council. In this respect the final version of the draft Strategy will be reported back to Council seeking its approval, including any amendments undertaken to address issues raised during the public exhibition period.

It should be noted that community consultation will be primarily undertaken on Council's website with limited physical engagement to address Government Policy on social distancing requirements due to the COVID-19 pandemic. Letters will also be sent to the proponents of planning proposals currently under assessment by Council, community housing providers and anyone who made a housing related submission during consultation on the draft LSPS.

Conclusion

The draft Strategy is underpinned by evidence-based studies and has been informed by preliminary community engagement, and initial targeted consultation with community groups and key stakeholders, including real estate agents, housing groups and social service agencies.

The draft Strategy is required to deliver on the housing related actions and priorities of Council's LSPS 'Campbelltown 2040', and comply with the requirements of the GSRP and WCDP with respect to strategic land use planning for housing growth in the Campbelltown LGA.

The draft Campbelltown Local Housing Strategy considers and responds to key trends and opportunities to ensure that housing growth in Campbelltown is appropriately managed in accordance with the strategic planning framework for Campbelltown.

Ordinary Council Meeting

11/08/2020

When finalised, the draft Strategy will play an important role in informing future LEP and DCP amendments, underpin the preparation of an Affordable Rental Housing Strategy for the LGA, and guide the decision making process of future planning proposals in the LGA relating to the provision of housing.

It is recommended that Council place the draft Campbelltown Local Housing Strategy on public exhibition for 28 days.

Attachments

1. Draft Campbelltown Local Housing Strategy (distributed under separate cover)

5. URGENT GENERAL BUSINESS

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