



PLANNING PROPOSAL

Amendment to Campbelltown LEP 2015

Appin Road & Kellerman Drive

ST HELENS PARK

MAY 2019



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Appin Road & Kellerman Drive ST HELENS PARK

MAY 2019

Prepared for: **Mir Group**
Suite 1B / 9 Lyn Parade
LIVERPOOL NSW 2170

Prepared by: **Design+Planning**
Suite 401, 171 Clarence Street
PO Box 1778
SYDNEY NSW 2000
P: (02) 9290 3636 E: admin@designandplanning.com.au

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CONTENTS

- EXECUTIVE SUMMARY 1**
- 1 INTRODUCTION 2**
- 2 SITE DESCRIPTION AND CONTEXT 3**
 - 2.1 Land Details 3
 - 2.2 Location 4
 - 2.3 The Site and Surrounds 4
- 3 PLANNING CONTEXT 7**
 - 3.1 Existing Zoning and Provisions 7
 - 3.2 Development Consent No. 39/2013 9
- 4 CONCEPT PLAN 10**
- 5 ECONOMICS ANALYSIS 13**
 - 5.1 Economic Impacts 13
- 6 THE PLANNING PROPOSAL 15**
 - 6.1 PART 1 – Objectives or Intended Outcomes 15
 - 6.2 PART 2 – Explanation of Provisions 15
 - 6.3 PART 3 - Justification 22
 - 6.4 PART 4 – Mapping 35
 - 6.5 PART 5 – Community Consultation 35
 - 6.6 PART 6 – Project Timeline 36
- 7 CONCLUSION 37**

APPENDICES

- Appendix 1 Architectural Concept Design (Clarke Hopkins Clarke – January 2019)
- Appendix 2 Economic Impact Assessment (MacroPlan Dimasi – May 2019)
- Appendix 3 Existing & Proposed Land Zoning Map
- Appendix 4 Existing & Proposed Lot Size Map
- Appendix 5 Existing & Proposed Height of Building Map
- Appendix 6 Existing & Proposed Lot Size for Dual Occupancy Map
- Appendix 7 Existing & Proposed Additional Permitted Uses Map



EXECUTIVE SUMMARY

The proposal seeks to rezone a site measuring approximately 7,617m² on the corner of Appin Road and Kellerman Drive, St Helens Park. The rezoning seeks a change from *R2 Low Density Residential* to *B1 Neighbourhood Centre* under *Campbelltown Local Environmental Plan 2015*. Further, the proposal seeks an increase in the permitted Building Height limit for the site from the current 8.5m to 9.0m to align with the height limit of other B1 zoned land in the locality. Upon rezoning the existing Additional Permitted Uses applicable to the site of *service station and neighbourhood shops* will no longer be relevant or required and accordingly are sought to be removed.

A service station with convenience store, vehicle access to Appin Road and Kellerman Drive, and internal roads was approved by Campbelltown City Council under DC 39/2013, dated 10 December 2013 and has since been constructed.

The Planning Proposal will enable additional local services and facilities for the local St Helens Park community and the users of St Helens Park Reserve, including the new Skate Park and future multi-functional activities planned by Campbelltown City Council.

The proposed B1 zone will provide new local employment opportunities for local residents, estimated to be around 39 additional jobs.

The Proposal will enable the addition of 1,710m² retail, commercial and business use floor space on the site, which could comprise local business and employment opportunities such as a neighbourhood supermarket, neighbourhood shops, restaurants, cafés, take away food and drink premise, together with business premises and shop top housing. Further, the concept proposal seeks to provide a gateway building at a prominent corner to the entry of the local neighbourhood of St Helens Park and more broadly the southern fringe of Campbelltown.

It is demonstrated that the proposed small local neighbourhood centre will have a negligible impact on exiting centres in the locality.



Concept Plan (Source: ClarkeHopkinsClarke, 2019)

1 INTRODUCTION

This Planning Proposal seeks to amend *Campbelltown Local Environmental Plan 2015* (CLEP 2015) to allow the establishment of a local neighbourhood centre, including shop top housing and take away food and drink premises to complement the constructed service station on the site. This is to be achieved by rezoning the site from *R2 Low Density Residential* to *B1 Neighbourhood Centre*. Further, the Planning Proposal seeks an increase in the height limit permitted for the site, to facilitate the delivery of the envisaged shop top housing.

The intended outcome is to provide local services and facilities for the community of St Helens Park and the users of St Helens Park Reserve, which is being transformed into a Regional Park by Council. The proposal seeks to facilitate local scale business and retail commercial uses servicing the daily needs of the surrounding residential area. Other higher order facilities to satisfy the less frequent weekly household needs can be provided at the higher order Rosemeadow centre or the Campbelltown/Macarthur Regional Centre.

The proposal for shop top housing will improve housing affordability and housing choice in the area, will provide passive surveillance to the proposed local neighbourhood centre and improve the feasibility of the centre. To deliver a feasible amount of shop top housing on the site and facilitate an appropriate scale of building this proposal also seeks to increase the height limit of the site from the current 8.5m to 9.0m. The increased height will facilitate the delivery of a landmark gateway building at this prominent corner site being the entry of the local neighbourhood of St Helens Park and more broadly the southern fringe of Campbelltown. Further, the increased height limit will align the site with other B1 zoned land in the locality.

The proposal will significantly improve the amenity and convenience for a significant portion of the St Helens Park and southern Campbelltown LGA community and provide new job opportunities for local residents, including the youth.

An amendment to CLEP 2015 is the most appropriate method to achieve the objectives and intended outcomes of this Planning Proposal.

2 SITE DESCRIPTION AND CONTEXT

2.1 Land Details

The land subject to this proposal is owned by Mir Group and incorporates a single Land Title with an approximate area of 7,560m² known as Lot 6202 DP1203930.



Figure 1: Land Details (Map source: SIX Maps NSW Spatial Services)

2.2 Location

The site is located within the South West Region of the Sydney Metropolitan Area in the locality of St Helens Park within the Local Government Area of Campbelltown City Council. The site is 5km south of the Campbelltown City Council Civic Centre.

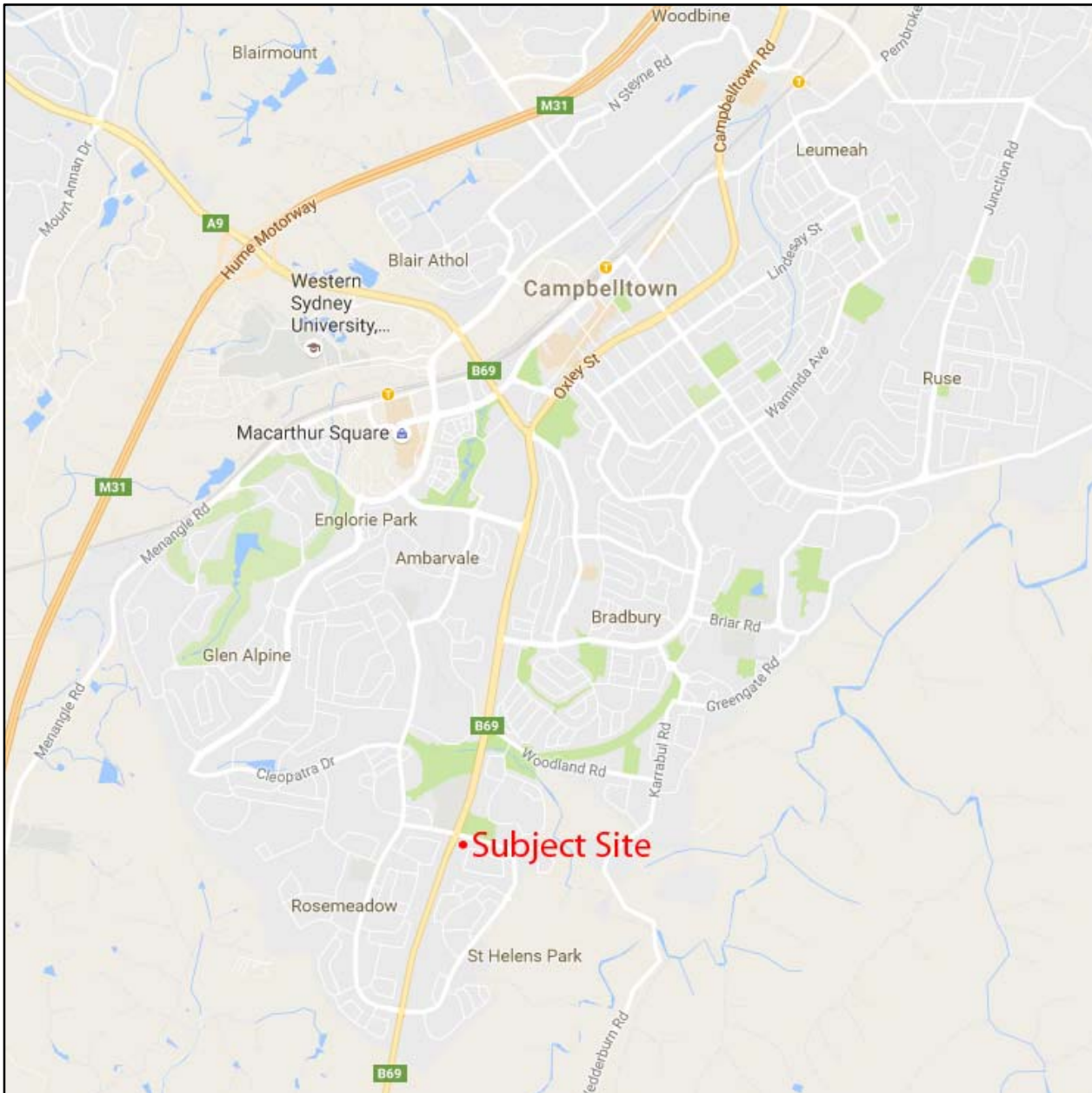


Figure 2: Regional Location (Map source: Google Maps)

2.3 The Site and Surrounds

2.3.1 Site

The site fronts Appin Road to the west and Kellerman Drive to the north. Residential development abuts the eastern and southern boundaries.

A service station is existing on the site and contained to the southern portion of the lot and includes concrete access driveways to both Appin Road and Kellerman Drive. The remaining area of the site has been cleared and slopes toward the north east.

2.3.2 Surrounds

Appin Road, which is a major transport route between Appin and the Illawarra to the south and Campbelltown and Greater Sydney to the north, has traffic volumes in excess of 20,000 vehicles per day. Kellerman Drive intersects Appin Road from the east and provides collector road access between the dwellings in St Helens Park and the broader road network. There are over 6,000 people living in the suburb of St Helens Park.

The surrounding areas are defined by Rosemeadow to the west of Appin Road and Bradbury to the north. Like St Helens Park, these areas are residential in character containing dwellings, schools, parks, churches and each has a dedicated local neighbourhood centre. St Helens Park has a site zoned for a neighbourhood centre further south but this site has not been developed for a local neighbourhood centre purpose to date.

The Rosemeadow Marketplace Shopping Centre services the weekly shopping needs for the nearby suburbs and contains a Woolworths, BWS, Reject Shop, McDonalds, Pizza Hut, medical centre, pharmacy and other specialty stores. There is also a Caltex service station adjacent to the Shopping Centre. Ambarvale High School is diagonally opposite to the site on the western side of Appin Road, which is located between the Shopping Centre and Appin Road.



Figure 3: Site and Surrounds Plan (Map source: SIX Maps NSW Spatial Services)

The 888 bus service services St Helens Park via Kellerman Drive and a bus stop is located less than 100 metres from the site. The 888 bus is a frequent service with 4 services in peak hours and typically 3 buses per hour at other times. The 888 service connects St Helens Park with the Campbelltown and Macarthur centres as well as the railway stations at each centre.

St Helens Park Reserve is immediately north of Kellerman Drive. The Reserve is substantial in size being over 3.5 hectares and Council is progressing the 'St Helens Park Reserve Master Plan' to better utilise the land and expand its functions to the local and broader community.

Bringing new facilities and activities to the Reserve and elevating its status to a Regional Park will create a popular place for local residents and the Campbelltown community. Some new facilities have already been provided by Council with the St Helens Park Skate Park. The Skate Park is of latest design standards and is a popular meeting place for the local community, particularly on weekends.



(Source: www.campbelltown.nsw.gov.au)

Other existing features of St Helens Park Reserve include lights, parking, toilets and park furniture (i.e. seating), and a safety fence is provided along the boundary with Appin Road.

The opposite side of Appin Road is residential housing. The houses are accessed from local residential streets and their rear fences are orientated to Appin Road. The rear fences are a prominent visual feature of the locality, which is demonstrated in **Figure 4** below.

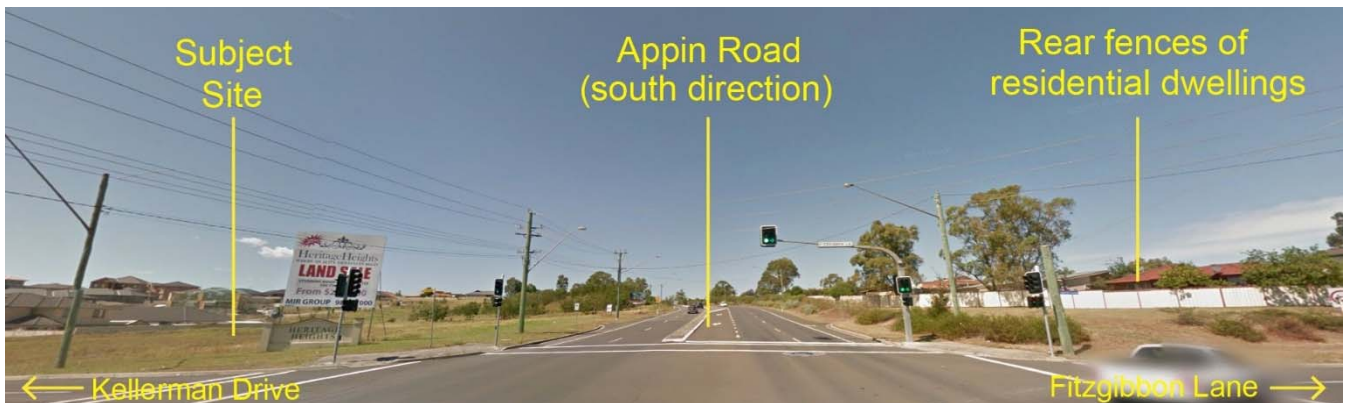


Figure 4: Residential Interface to Site

3 PLANNING CONTEXT

3.1 Existing Zoning and Provisions

The site is currently zoned 'R2 Low Density Residential' in Campbelltown Local Environmental Plan 2015 (Campbelltown LEP 2015) as shown in **Figure 5** below.

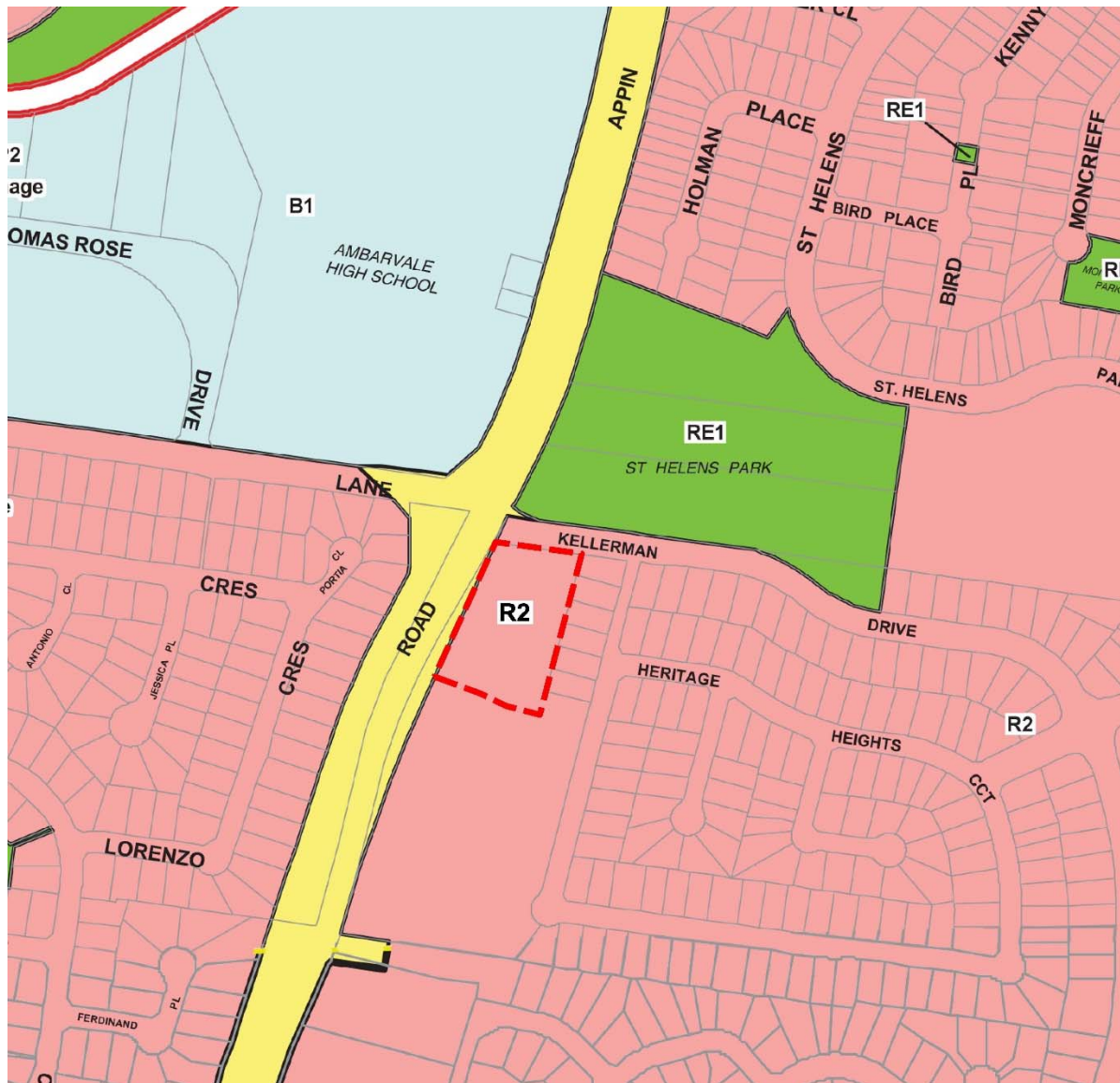


Figure 5: Existing Zoning in Campbelltown LEP 2015

Other Principal Development Standards in Part 4 and the Map set in Campbelltown LEP 2015 that apply to the site are in **Table 1**.

Table 1: Principal Development Standards applying to site

Type of Standard	Numerical Standard
Minimum Lot Size	500m ²
Lot Size for Dual Occupancy (minimum)	700m ²
Height of Buildings	8.5m

A submission was made on the Draft Campbelltown LEP 2015 for the subject site, which sought to rezone the site to *B1 Neighbourhood Centre* as part of the finalisation of Council's new LEP. However, Council during its consideration of the Draft LEP at the meeting of 28 April 2015 was not able to support the request as it was considered that more detailed 'retail/economic analysis' needed to be presented to support the proposed *B1 Neighbourhood Centre* zone.

This Planning Proposal includes more detailed specialist analysis on retail and economic effects of the proposed neighbourhood centre, which is explained in detail under Section 5 of this report.

3.1.1 Additional Use for a Service Station/Convenience Store

The land has been subject to LEP provisions to allow an additional use for a service station and convenience store/neighbourhood shop. A site specific additional use was applied to the site under Campbelltown (Urban Area) Local Environmental Plan 2002, which no longer applies to the site. This was listed in 'Schedule 2 Additional development' which read:

2 *Development for the purpose of a service station/convenience store:*

Lot 1112 DP 1025751, Appin Road, corner of Appin Road with northern end of Kellerman Drive, St Helens Park,

The additional use applied to a large superlot being Lot 1112, which has been progressively subdivided over time for residential purposes.

The additional use for the service station and neighbourhood shop was adopted in Campbelltown LEP 2015, which is now the relevant Planning Instrument applying to the site. The additional use was listed at No.38 in 'Schedule 1 Additional permitted uses' as outlined below and annotated on the Additional Permitted Uses Map (refer **Figure 6**).

38 Use of certain land at Appin Road, St Helens Park

(1) This clause applies to land at Appin Road, corner of Appin Road with northern end of Kellerman Drive, St Helens Park, being Lot 1112, DP 1025751.

(2) Development for the purpose of a service station and neighbourhood shop is permitted with development consent.



Figure 6: Additional Use No.38 in Campbelltown LEP 2015

Upon rezoning to *B1 Neighbourhood Centre*, the additional permitted uses of *service station and neighbourhood shops* is no longer relevant or required. Accordingly, this proposal seeks to remove these additional permitted uses from the site.

3.2 Development Consent No. 39/2013

Development Consent 39/2013 was approved by Council on 10 December 2013. The consent approved the “construction and operation of a 24 hour service station and convenience store, including ancillary site works and landscaping”. These works are now complete as demonstrated in Figures 1 and 3 above.

The service station and associated uses and activities were approved under the additional use provisions within Council's LEP.

The consent imposed conditions to mitigate noise impacts on adjoining residents from the approved activities, which included the submission of an Acoustic Assessment Report. The Acoustic Assessment Report prepared by SLR consulting recommended the following:

- Placement of mechanical ventilation appliances in locations that meet compliance standards in relation to impacts on residential development.
- Forecourt vehicle noise would not exceed existing ambient noise levels and must comply with night-time sleep disturbance criterion of 53dBA.
- Tanker and truck deliveries would meet acceptable standards for daytime, evening and night-time criteria.
- A barrier of 3m in height is to be installed along the southern and eastern boundaries, which interface with the surrounding residential receivers.

The above acoustic mitigation measures have been required for the approved service station use and it is envisaged that this will be the activity that would have the highest impact on local residents. Other uses that could be established as a consequence of this proposal would be of lesser impact and could be managed under the requirements imposed for the Development Application for the 24 hour service station.

Since it is demonstrated that amenity impacts associated with the service station activity can be appropriately managed, it is reasonable that other potential uses in the small local neighbourhood centre would have lower levels of impact on adjoining residences, while also typically operating during the more active times of the day. Further, the proposed new building will itself contribute to buffer road noise emanating from Appin Road and therefore have a positive impact on the residences to the east.

The consent also restricted heavy vehicle access to the site from Appin Road only and prohibits access from Kellerman Drive. The condition on page 4 of the consent letter states:

18 Heavy Vehicle Access

Articulated and heavy rigid vehicles servicing the site shall not enter from Kellerman Drive at any time.

Rezoning the site for a neighbourhood centre with shop top housing will not impact this access arrangement and would be logically applied to any proposal envisaged through this rezoning.

4 CONCEPT PLAN

A Concept Plan has been developed to inform the configuration and potential activities to be delivered on the site. The Concept Plan adopts the approved and constructed service station facility, internal roads and external access points. The Concept Plan also includes activities permitted within the proposed B1 zone such as business premises, neighbourhood shop, recreation facilities (indoor), restaurants or cafes, shop top housing, and take away food and drink premises. A copy of the Concept Plan is provided as **Appendix 1**.

As a guide the anticipated potential uses include:

- Neighbourhood supermarket
- Restaurant/café
- Medical centre/consulting rooms
- Fitness centre / Gymnasium
- Specialty shops (hairdresser, beautician, bakery, newsagency)
- Takeaway food
- Real estate agent



Figure 7: Concept Plan (Ground Floor) (ClarkeHopkinsClarke, 2019)



Figure 8: Concept Plan (Perspective) (ClarkeHopkinsClarke, 2019)

The Concept Plan provides additional floor space potential of approximately 1,710m², which will be subject to more detailed design at the Development Application stages. The Concept Plan layout retains the access arrangements to and from Appin Road and Kellerman Drive as per the approved and constructed Petrol Station development. Provision for a loading dock for the retail commercial building has also been provided.

The small local neighbourhood centre will enable a range of local services for the local community of St Helens Park, which will also benefit from its accessibility from the movement economy of Appin Road. This will ensure greater economic sustainability for the local services in the neighbourhood centre to ensure they are maintained for the residents of St Helens Park.

There are major plans underway for St Helens Reserve to the north with the intent to provide a range of cultural and recreational functions through a master plan design process to create a park of regional significance. The Skate Park has already been provided which attracts many members from the local community. The establishment of the proposed local neighbourhood centre will provide local services immediately adjacent to the Reserve providing the opportunity for users to obtain refreshments in conjunction with the use of the Reserve. Pedestrian access to the site from the Reserve is also available without the need to cross Appin Road, improving safety for users.

The local neighbourhood centre will create a significantly improved interface with the intersection of Appin Road and Kellerman Drive. The opposite corner of Appin Road and Fitzgibbon Lane has visually prominent rear colorbond fences that present a poor interface with the intersection. If the site was developed for residential purposes as intended by the current R2 low density residential zone, a similar outcome of rear residential fences that are visually obtrusive and have poor appearance would result. If the local neighbourhood centre development does not occur, then the site will be developed with residential allotments and result in a poor design outcome.

The small local neighbourhood centre will provide a significantly better visual interface with the site that will also improve the visual character around the intersection. The main retail commercial building is setback from Appin Road and Kellerman Drive, and with an internal access road from Kellerman Drive, the site will open and become a distinctive entry feature and gateway building to St Helens Park and more broadly the southern fringe of Campbelltown. Accordingly, the local neighbourhood centre will result in a significantly improved urban design outcome in comparison to residential development.

The mass of the building will contribute to acoustic mitigation for the residents behind the local neighbourhood centre. While the acoustic and overlooking impacts of the activities on the site are managed by acoustic barriers and conditions under the development consent.

5 ECONOMICS ANALYSIS

To assess the impact of the proposal on the existing surrounding retail and convenience centres an Economic Impact Assessment (EIA) has been commissioned and is provided as **Appendix 4**. The report presents an independent assessment of the needs and demand for the proposed retail and convenience centre and the consequential impacts on surrounding centres.

The EIA demonstrates an appreciation of the site context, including identifying the main trade areas of St Helens Park, parts of Bradbury and Rosemeadow, as well as the prominent position with frontage to Appin Road. Further the report considers the likely increase in population expected in the area including from the completion of the Heritage Heights estate which adjoins the site to the east and south; the greenfield fringe land identified along Kellerman Drive and which Council is currently assessing a Development Application for the construction of 348 residential lots (refer to DA 2675/2008); the Mount Gilead Estate Retirement Village currently under construction and planned to accommodate 840 retirement villas and 270 aged care units; land within Rosemeadow around Julius Reserve anticipated to yield 170 residential lots; and the Greater Macarthur Land Release Investigation Area which has the potential to accommodate 18,000 dwellings over the longer term. All of these projects are expected to result in increased demand for retail facilities in the area.

5.1 Economic Impacts

The EIA considers the competitive environment which the site is located and identifies the Campbelltown-Macarthur Regional City as containing the highest order retail facilities in the region and include a regional shopping centre (Macarthur Square) a sub-regional shopping centre (Campbelltown Mall) a supermarket based centre (Market Fair) and an extensive retail strip. Further the assessment identifies the smaller convenience oriented supermarket based shopping centres within the locality including Rosemeadow, Ambarvale, Bradbury, Airs and Ruse. Food catering facilities are also reviewed with the closest outside of the Campbelltown-Macarthur Regional City, being the McDonalds and Pizza Hut contained at Rosemeadow.

The assessment concludes that the estimated impacts across the identified centres are considered to be within an acceptable range and when considered in the context of a lack of food catering and retail facilities in the area, as well as the size, performance, role and function of the surrounding centres, the proposal would be highly unlikely to result in any reduction in the provision of retail outlets across the region. Further, the assessment identifies the following economic benefits of the proposal:

- i) Total retail expenditure is expected to grow at 1.9% per annum within the primary trade area.
- ii) Local food catering facilities (restaurants, fast food/takeaway, etc.) are all contained within the Campbelltown-Macarthur Regional City except for some facilities at Rosemeadow incorporating McDonalds and Pizza Hut. Therefore, these are the only catering services available to the St Helens Park community unless they travel to the Regional City centre.
- iii) The proposed small supermarket based centre has potential to generate sales volumes of \$9.5M per annum at 2021/22, representing 3.1% of the available retail expenditure within the main trade area.
- iv) Trade impacts below 10% are considered to be 'relatively moderate' and impacts below 5% are considered 'minor/negligible'. The proposal is modelled to have a trade impact of 5.3% on the Rosemeadow centre and only minor on the other existing smaller neighbourhood centres.
- v) It is estimated the local neighbourhood centre when operational will create a net increase in jobs of 77.
- vi) Other positive economic benefits including:
 - Increased choice and amenity for the population of the main trade area as well as likely increased competition for the benefit of consumers.
 - More convenient access to new convenience-oriented amenities, to serve both the main trade area population, as well as passing traffic along Appin Road.
 - Reduced travel distances, leading to savings on time for main trade area residents, due to a better provision of retail and non-retail facilities at the local level.
 - Providing jobs near people's homes and consequent economic multiplier impacts, which will boost the local economy.

5.1.1 Existing B1 Zoned Land – Kellerman Drive

The EIA considers the impact of the proposed rezoning on the existing site zoned *B1 Neighbourhood Centre* located on Kellerman Drive. This site is presently occupied by the St Helens Park Public School and the St Helens Park Community Hall, with the remaining land vacant. The site has been subject of previous studies produced by Hill PDA on behalf of Campbelltown Council when preparing the *Campbelltown City Business Centres Strategy* (2005) and a separate letter dated 28 October 2014.

The key points of the previous economic study and letter include:

- The Kellerman Drive B1 zoned site is unlikely to capture any reasonable level of expenditure beyond St Helens Park given its location on Kellerman Drive, inboard from Appin Road. This limits the potential for any retail development to viably establish at the site.
- High car ownership levels and the influence of other centres within the region undermine the viability of any supermarket based neighbourhood centre on the B1 zoned site on Kellerman Drive.
- No retail development has occurred on the B1 zoned site since St Helens Park was developed in the 1990s.
- The *Campbelltown Business Centres Strategy* highlights the benefits of a commercial centre being provided at the site subject of this proposal, as opposed to the Kellerman Drive B1 zoned site, including the ability to service a larger trade area; exposure to passing trade; greater convenience; and less commercial risk.
- It is understood that the vacant part of the B1 zoned site at Kellerman Drive and the subject site are under the same ownership, therefore any impacts on this centre would be incurred by the same owner.

6 THE PLANNING PROPOSAL

6.1 PART 1 – Objectives or Intended Outcomes

The objective of this Planning Proposal is to rezone a site with an area of approximately 7,560m² from *R2 Low Density Residential* to *B1 Neighbourhood Centre* to facilitate a small local neighbourhood centre. The site already contains an approved service station with access to Appin Road and Kellerman Drive and internal access roads. The proposed rezoning has the potential, as demonstrated through the provided Concept Plan to enable approximately 1,710m² of additional business and retail floor space on the site, which could comprise neighbourhood shops, restaurants, cafés, take away food and drink premise, together with business premises, a gym and shop top housing. To deliver the outcomes envisaged as part of the concept plan, the Planning Proposal also seeks an increase in the maximum building height from 8.5m to 9.0m. The increased height will facilitate the delivery of a landmark gateway building at this prominent corner site being the entry of the local neighbourhood of St Helens Park and more broadly the southern fringe of Campbelltown. Further, the increased height limit will align the site with other B1 zoned land in the locality.

The intended outcome is to provide an economically viable local neighbourhood centre, which provides a diversity of housing to the area combined with services and facilities for the community of St Helens Park including the users of St Helens Park Reserve. This will ensure the local community is provided with local services and facilities to meet their daily needs within walking distance or a short drive. Other higher order facilities to satisfy weekly needs can be provided at the Rosemeadow centre or the Campbelltown/Macarthur Regional Centre.

The proposal will significantly improve the amenity and convenience for a significant portion of the St Helens Park and Campbelltown Local Government Area community and provide new job opportunities for local residents, including the youth.

6.2 PART 2 – Explanation of Provisions

All amendments apply to *Campbelltown Local Environmental Plan 2015*. To achieve the outcomes envisaged through the concept plan, the Planning Proposal seeks to amend the Maps applying to the subject site and amend text in the LEP. In summary, the amendments include:

- Amendment to the Land Zoning Map, Lot Size Map, Height of Buildings Map and Lot Size for Dual Occupancy Map.
- Amendment through deletion of the existing 'Schedule 1 Additional Permitted Uses' pertaining to the site.
- Amendments to Additional Permitted Use Maps.

A summary of changes to the Maps is outlined in **Table 2**.

Table 2: Summary of amendments to Campbelltown LEP 2015 Maps

Map	Summary of Changes
<i>Land Zoning Map - Sheet LZN_009A</i>	<ul style="list-style-type: none"> • Amend current zoning of '<i>R2 Low Density Residential</i>' applying to the site to '<i>B1 Neighbourhood Centre</i>'.
<i>Lot Size Map - Sheet LSZ_009</i>	<ul style="list-style-type: none"> • Remove the lot size annotation of "I" which applies a minimum lot size of 500m², from the area being rezoned to B1.
<i>Height of Buildings Map – Sheet HOB_009</i>	<ul style="list-style-type: none"> • Amend the Maximum Building Height to 9.0m for the area being rezoned to B1.
<i>Lot Size for Dual Occupancy Development Map - Sheet LSD_009</i>	<ul style="list-style-type: none"> • Remove the lot size annotation of "Q", which applies a minimum lot size of 700m², from the area being rezoned to B1.
<i>Additional Permitted Uses Map - Sheet APU_009AB</i>	<ul style="list-style-type: none"> • Removal of the site from the Additional Permitted Use Map.

6.2.2 Amendment to Lot Size Map

The lot size annotation “1” currently applies a minimum lot size of 500m² to the site. As minimum lot size requirements do not apply to the areas zoned *B1 Neighbourhood Centre* in Campbelltown LEP 2015, it is proposed to remove the minimum lot size annotation from the area being rezoned to *B1 Neighbourhood Centre*. It is also proposed that the section of Kellerman Drive abutting the site affected by the minimum lot size requirements be removed from the Map. A comparison of the current and proposed minimum lot size annotations is included in **Appendix 6** with the proposed minimum lot size requirements below.



Figure 10: Proposed Lot Size Map

6.2.3 Amendment to Height of Buildings Map

The height of building annotation “I” currently applies a minimum building height of 8.5m to the site. To align the site with other B1 zoned land within the locality and facilitate the delivery of an economically viable local neighbourhood centre which brings a diversity of housing to the area through the provision of ‘shop top housing’ the Planning Proposal seeks to amend the maximum building height to 9m. A comparison of the current and proposed Height of Buildings Map is included in **Appendix 7** with the proposed maximum building height for the site shown below.



Figure 12: Height of Building Map

6.2.4 Amendment to Lot Size for Dual Occupancy Map

The lot size for dual occupancy annotation of “Q”, which applies a minimum lot size of 700m², currently applies to the subject site. As minimum lot size for dual occupancy requirements do not apply to the areas zoned *B1 Neighbourhood Centre* in Campbelltown LEP 2015, it is proposed to remove the minimum lot size for dual occupancy annotation from the area being rezoned to *B1 Neighbourhood Centre*. It is also proposed that the section of Kellerman Drive abutting the site affected by the minimum lot size for dual occupancy requirements be removed from the Map. A comparison of the current and proposed minimum lot size for dual occupancy annotations is included in **Appendix 8** with the proposed minimum lot size for dual occupancy requirements below.

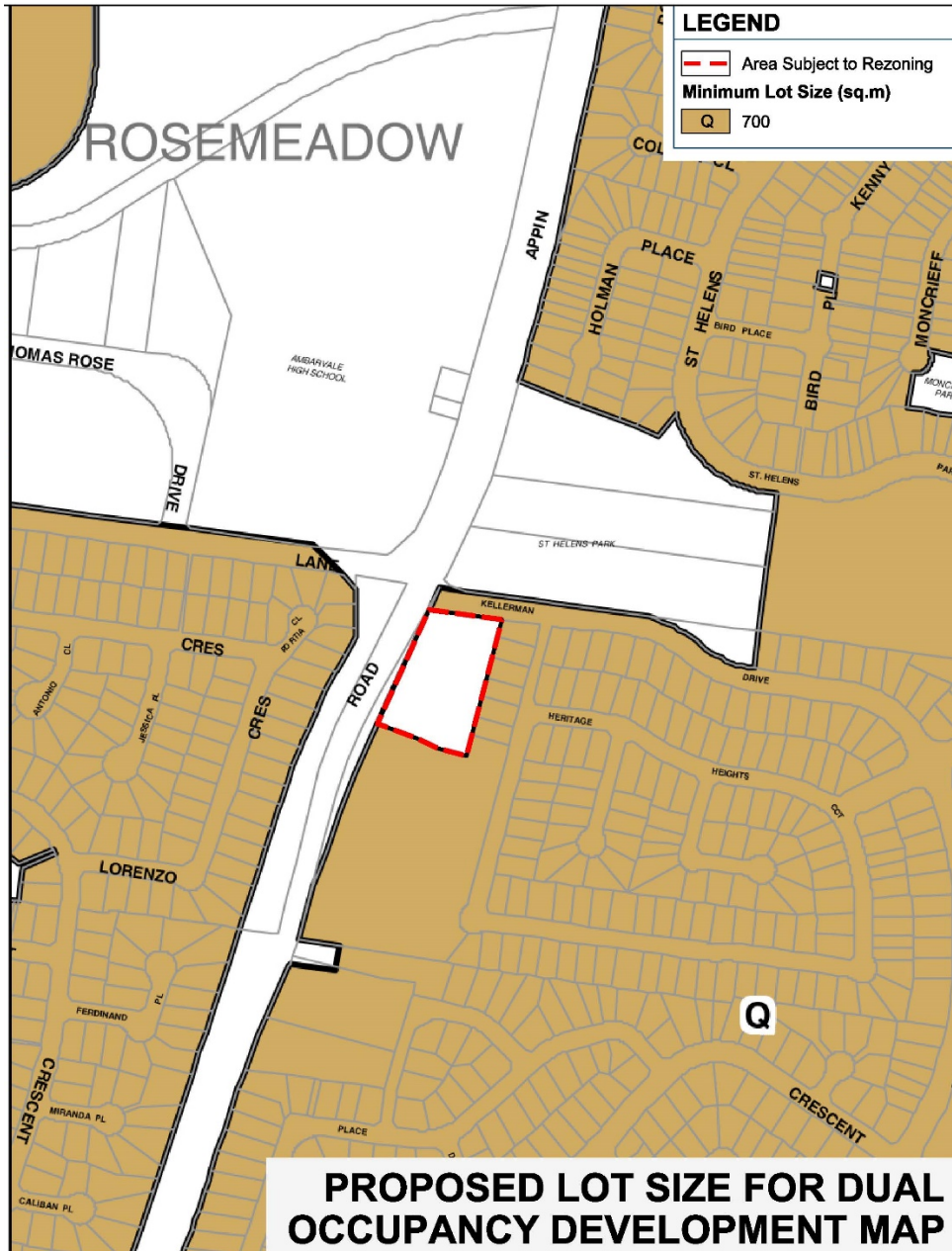


Figure 13: Proposed Lot Size for Dual Occupancy Map

6.2.5 Amendment to Text in Schedule 1 Additional Permitted Uses and Maps

Additional permitted use No.38 in 'Schedule 1 Additional Permitted Uses' applies to the site and allows a service station and neighbourhood shop. However, these additional permitted uses would be redundant in the circumstance that the site is zoned *B1 Neighbourhood Centre*, as these uses are permitted within the B1 zone.

This additional permitted use is the second last listing in Schedule 1 and this amendment will affect the numbering of the subsequent list of additional use No.39. The existing and proposed text in Schedule 1 is as follows:

Existing text in Schedule 1:

38 Use of certain land at Appin Road, St Helens Park

- (1) *This clause applies to land at Appin Road, corner of Appin Road with northern end of Kellerman Drive, St Helens Park, being Lot 1112, DP 1025751.*
- (2) *Development for the purpose of a service station and neighbourhood shop is permitted with development consent.*

39 Use of certain land at Woodland Road, St Helens Park

- (1) *This clause applies to land at Woodland Road, St Helens Park, being Lot 2, DP 746511.*
- (2) *Development for the purpose of a place of public worship is permitted with development consent.*

Existing text above to be replaced with:

38 Use of certain land at Woodland Road, St Helens Park

- (1) *This clause applies to land at Woodland Road, St Helens Park, being Lot 2, DP 746511.*
- (2) *Development for the purpose of a place of public worship is permitted with development consent.*

The amendments to the Additional Permitted Uses Map set include:

1. Remove the Map titled 'Additional Permitted Uses Map - Sheet APU_009AB'.
2. Renumber Additional Permitted Use No.39 to No.38.
3. Amending the reference for existing Additional Permitted Uses Map 'Sheet APU_009AC' to 'Sheet APU_009AB'.

Other than removing the existing Additional Permitted Use No.38 from the Maps, there are no changes to the existing planning provisions or allowances for any other Additional Permitted Use in Campbelltown LEP 2015.



Figure 13: Proposed Additional Permitted Uses Map

6.3 PART 3 - Justification

6.3.1 Section A – Need for the Planning Proposal

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

This Planning Proposal for St Helens Park is not the result of any specific strategic study or report. It has been prepared to formalise the approved and intended land uses activities on the site and include a broader range of local services and facilities for nearby residents, which will provide around 1,710m² of additional floorspace for permissible neighbourhood supermarket, neighbourhood shops, restaurants, cafés, take away food and drink premise, together with business premises and shop top housing.

This Proposal provides an opportunity to improve the amenity for the local community by providing convenient access to daily shopping needs in walking distance to their homes within a landmark building at a prominent corner site. In addition to this Planning Proposal report, the comprehensive economic analysis has been undertaken to demonstrate the proposal is of negligible impact from an economic standpoint, while providing the benefit of additional employment for the local area. The addition of shop top housing will improve housing choice and affordability in the area and will create opportunities for passive surveillance to the development.

The Proposal also satisfies the policies and objectives of State and local level strategies applying to the site, which is discussed in greater detail in Section B.

2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

Rezoning the land to *B1 Neighbourhood Centre* is best means in achieving the outcomes in this Planning Proposal and envisaged within the Concept Plan, while ensuring flexibility in the ultimate operations to be accommodated on site.

The land is currently subject to an Additional Permitted Use that allows a service station (approved under DC 39/2013) and neighbourhood shop, with a restricted floor area of 100m² (per shop). To enable additional local services and facilities to improve amenity, accessibility and convenience for the community of St Helens Park and the users of St Helens Park Reserve, the site needs to be rezoned as proposed. The rezoning will facilitate greater flexibility in the type of retail commercial uses and the extent of floor area for each use permitted on site, providing greater certainty that the intended retail commercial outcome can be fulfilled to service the growing need (refer to the Economic Impact Assessment contained in **Appendix 4**).

Rezoning the site for *B1 Neighbourhood Centre* will also establish a clear understanding of intent to the community of St Helens Park and the broader community for creating a small local neighbourhood centre at the proposed site.

6.3.2 Section B – Relationship to Strategic Planning Framework

3. Is the planning proposal consistent with the objectives and actions of the applicable regional or sub-regional strategy?

In December 2014 the NSW Government released '*A Plan for Growing Sydney*', which provides the NSW Government's plan for the future of the Sydney Metropolitan Area over the next 20 years. The Plan provides key directions and actions to guide Sydney's productivity, environmental management, and liveability including the delivery of housing, employment, infrastructure and open space.

The NSW Government has since created the Greater Sydney Commission, who recently released the *Greater Sydney Region Plan A Metropolis of Three Cities* (the Greater Sydney Region Plan), which proposes to reframe the planning for the Greater Sydney Region through the establishment of a polycentric Sydney. The Region Plan sets objectives and actions based on five key areas, including *Infrastructure and Collaboration, Liveability, Productivity and Sustainability*.

The *Western City District Plan* has also been released by the Greater Sydney Commission. The Western District is Sydney's fastest growing district, with the plan outlining a 20-year vision for the area as follows:

The vision for Greater Sydney as a metropolis of three cities – the Western Parkland City, the Central River City and the Eastern Harbour City and a 30-minute city – means residents in the Western City District will have quicker and easier access to a wider range of jobs, housing types and activities. This vision will improve the District's lifestyle and environmental assets.

Tables 3 and 4 below demonstrates how the Planning Proposal is consistent with the *Greater Sydney Region Plan* and the *Western City District Plan*.

Table 3: Greater Sydney Region Plan

Greater Sydney Region Plan Priority	Compliance Statement
Infrastructure and Collaboration	
<p>Objective 1: Infrastructure supports the three cities Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Prioritise infrastructure investment to support the vision of a metropolis of three cities. • Sequence growth across the three cities to promote north-south and east-west connections. 	Not applicable to a Planning proposal of this scale.
<p>Objective 2: Infrastructure aligns with forecast growth – growth infrastructure compact Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Align forecast growth with infrastructure. • Sequence infrastructure provision across Greater Sydney using a place-based approach. 	Not applicable to a Planning proposal of this scale.
<p>Objective 3: Infrastructure adapts to meet future needs Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Consider the adaptability of infrastructure and its potential shared use when preparing infrastructure strategies and plans. 	Not applicable to a Planning proposal of this scale.
<p>Objective 4: Infrastructure use is optimised Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Maximisation of the utility of existing infrastructure assets and consideration to the strategies to influence behaviour changes, to reduce the demand for new infrastructure, including supporting the development of adaptable and flexible regulations to allow decentralised utilities. 	Not applicable to a Planning proposal of this scale.
<p>Objective 5: Benefits of growth realised by collaboration of governments, community and business</p>	The site is ideally located to provide the local services to meet the daily needs of the surrounding community, as permitted within the B1 zone proposed through this Planning Proposal. Through collaboration with Council and the community, maximum community benefit can be achieved on the site as advocated through the submitted concept plan and proposed rezoning.

Liveability	
<p>Objective 6: Services and infrastructure meet communities changing needs</p> <p>Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Deliver social infrastructure to reflect the needs of the community now and in the future. • Optimise the use of available public land for social infrastructure. 	<p>Not applicable to a Planning proposal of this scale.</p>
<p>Objective 7: Communities are healthy, resilient and socially connected.</p> <p>Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Deliver inclusive places for people of all ages and abilities that support healthy, resilient and socially connected communities by: <ul style="list-style-type: none"> – Providing walkable places with active street life and a human scale. – prioritising opportunities for people to walk, cycle and use public transport. – co-locating schools, social, health, sporting, cultural and shared facilities. – promoting local access to healthy fresh food and supporting local fresh food production. 	<p>The Planning Proposal will facilitate a land use that promotes public activity and social interaction adjacent to a public open space asset delivered for the community. A neighbourhood centre at the site will enhance surveillance, territorial reinforcement and space management for St Helens Park Reserve helping to build a safe community with a strong sense of place built on the guidelines of <i>Crime Prevention Through Environmental Design</i>.</p> <p>The proposal will be an attractive addition to the neighbourhood, offering everyday convenience for people of all ages and abilities and a mix of land uses including business and retail uses together with residential shop top housing. This will encourage walking and a socially connected community.</p>
<p>Objective 8: Greater Sydney's communities are culturally rich with diverse neighbourhoods</p> <ul style="list-style-type: none"> • Incorporate cultural and linguistic diversity in strategic planning and engagement. • Consider the local infrastructure implications of areas that accommodate large migrant and refugee populations. 	<p>The Planning Proposal, through the delivery of shop top housing, will facilitate the creation of housing choice within St Helens Park assisting in the creation of diverse neighbourhoods.</p>
<p>Objective 10: Greater housing supply</p> <p>Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Prepare housing strategies • Develop 6-10-year housing targets 	<p>Not applicable to a Planning proposal of this scale.</p>
<p>Objective 11: Housing is more diverse and affordable</p> <p>Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Prepare Affordable Rental Housing Target Schemes. • State Agencies, are required to address housing diversity when disposing of land. 	<p>This Planning Proposal seeks to increase the supply of residential housing in Western Sydney which will have positive impacts on housing diversity and affordability.</p>
<p>Objective 12: Great Places that bring people together</p> <p>Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Deliver great places by prioritising people friendly public realms, balancing the function of streets, providing fine grain urban form and walkability, encourage contemporary heritage where possible and used a placed based approach. • In Collaboration Areas, Planned Precincts and Planning for Centres investigate the need for precinct based provision of adaptable car parking and infrastructure in lieu of private provision of car parking. Ensure parking availability takes into account the level of public transport and consider the capacity for places to change and evolve to accommodate different activities over time. 	<p>The Planning Proposal will facilitate a land use that promotes public activity and social interaction adjacent to a public open space asset delivered for the community. A local neighbourhood centre at the site will enhance surveillance, territorial reinforcement and space management for St Helens Park Reserve helping to build a safe community with a strong sense of place.</p> <p>Car parking is provided to cater for the needs of the centre and the residents.</p>

<p>Objective 13: Environmental heritage is conserved and enhanced</p> <p>Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Conserve and enhance environmental heritage by engaging with the community early in the planning process to understand Aboriginal, European and natural heritage values. • Conserve and interpret Aboriginal, European and natural heritage to foster distinctive local spaces. 	<p>Not applicable to a proposal of this scale. The site has been assessed as being suitable for development.</p>
<p>Productivity</p>	
<p>Objective 14: A metropolis of three cities – integrated land use and transport creates walkable and 30-minute cities</p> <p>Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Integrate land use and transport plans to deliver the 30-minute city. • Investigate, plan and protect future transport and infrastructure corridors. • Support innovative approaches to the operation of business, educational and institutional establishments to improve the performance of the transport network. 	<p>The Planning Proposal contributes to local job growth and creation and provides opportunities for people to live and work in their community. The planning proposal will deliver a local neighbourhood centre that compliments the growth and evolution of the existing established residential neighbourhood, including the embellished St Helens Park Reserve.</p> <p>The delivery of the Concept Plan as envisaged inclusive of shop top housing supports the principles of the 30-minute city.</p>
<p>Objective 16: Freight and logistics network is competitive and efficient</p> <p>Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Manage the interfaces of industrial areas, trade gateways and facilities by land use activities that protect sensitive receivers, and do not encroach on commercial, residential and other non-compatible land uses. 	<p>This Planning Proposal has considered the interface between the residential land surrounding the proposal. The development may act as a noise barrier to the busy intersection at Appin Road with further details relating to overlooking and solar access to be considered as part of a future development application.</p>
<p>Objective 22: Investment and business activity in centres</p> <p>Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Provide access to jobs, goods and services in centres • Create new centres in accordance with the principles for Greater Sydney's centres. 	<p>The proposed neighbourhood centre will provide local convenience shopping which will have a negligible trade impact on the assessed local centres of Rosemeadow, Airs, Bradbury, Ambarvale and Ruse along with the Regional centre of Campbelltown-Macarthur. The proposal will facilitate the delivery of local convenience shopping and employment within walking distance of the local community, supporting liveability outcomes of the region plan.</p>
<p>Sustainability</p>	
<p>Objective 27: Biodiversity is protected, urban bushland and remnant vegetation is enhanced</p> <p>Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Supporting landscape-scale biodiversity conservation and the restoration of bushland corridors. • Managing urban bushland and remnant vegetation as green infrastructure. • Managing urban development and urban bushland to reduce edge-effect impacts. 	<p>The subject land is clear of vegetation and will not impact local biodiversity.</p>
<p>Objective 30: Urban tree canopy cover is increased.</p> <p>Applicable Actions and Strategies:</p> <ul style="list-style-type: none"> • Expand urban tree canopy in the public realm. 	<p>The site is currently cleared of all vegetation. Development of the site will require landscape objectives and outcomes to be delivered adding to the surrounding urban tree canopy. Landscape details will form part of future development applications on the site.</p>
<p>Objective 31: Public open space is accessible, protected and enhanced</p>	<p>The planning proposal will deliver a neighbourhood centre that compliments the growth and evolution of the existing established residential neighbourhood, including the embellished St Helens Park Reserve.</p>

	<p>The Planning Proposal will facilitate a land use that promotes public activity and social interaction adjacent to a public open space asset used by the community. A neighbourhood centre at the site will enhance surveillance, territorial reinforcement and space management for St Helens Park Reserve helping to build a safe community with a strong sense of place.</p> <p>The proposed neighbourhood centre is located to encourage people to walk to the site and will be of benefit to those utilising the open space adjacent.</p>
Objective 32: The Green Grid links parks, open spaces, bushland and walking and walking paths	The adjacent St Helens Park Reserve has the potential to be utilised as part of the Green Grid.

Table 4 below outlines each District Priority and how this proposal meets the respective requirements.

Table 4: Response to Western City District Plan Priorities

Western City District Plan Priority	Compliance Statement
Infrastructure and Collaboration	
<p>Planning Priority W1: Planning for a city supported by infrastructure</p> <p>Applicable Actions:</p> <ul style="list-style-type: none"> (2) Infrastructure aligns with forecast growth – growth infrastructure compact (4) Infrastructure use is optimised. 	<p>The planning proposal will deliver a neighbourhood centre that compliments the growth and evolution of the existing established residential neighbourhood, including the embellished St Helens Park Reserve.</p> <p>The Planning Proposal will facilitate a land use that promotes public activity and social interaction adjacent to a public open space asset used by the community. A neighbourhood centre at the site will enhance surveillance, territorial reinforcement and space management for St Helens Park Reserve helping to build a safe community with a strong sense of place.</p> <p>The proposed neighbourhood centre is located to encourage people to walk to the site and will be of benefit to those utilising the open space adjacent.</p>
<p>Planning Priority W2: Working through collaboration</p>	<p>The site is ideally located to provide the local services to meet the daily needs of the surrounding community, as permitted within the B1 zone proposed through this Planning Proposal. Through collaboration with Council and the community, maximum benefit can be achieved on the site as advocated through the submitted concept plan and proposed rezoning.</p>
Liveability	
<p>Planning Priority W3: Providing services and social infrastructure to meet people's changing needs</p> <p>Applicable Actions:</p> <ul style="list-style-type: none"> (9) Deliver social infrastructure to reflect the needs of the community now and in the future. 	<p>The Planning Proposal will generate new employment opportunities within the St Helens Park community. A neighbourhood centre provides valuable youth employment opportunities close to home, improving productivity of the local economy.</p> <p>The delivery of a neighbourhood centre at the site will encourage local residents to walk to their local convenience store or café, making these everyday activities easier and more enjoyable.</p> <p>The Planning Proposal will facilitate a land use that promotes public activity and social interaction adjacent to a public open space asset used by the community. A neighbourhood centre at the site will enhance surveillance, territorial reinforcement and space management for St Helens Park Reserve helping to build a safe community with a strong sense of place built on the guidelines of <i>Crime Prevention Through Environmental Design</i>.</p>

<p>Planning Priority W4: Fostering healthy, creative, culturally rich and socially connected communities</p> <p>Applicable Actions:</p> <ul style="list-style-type: none"> • (11) Deliver healthy, safe and inclusive places for people of all ages and abilities that support active, resilient and socially connected communities by: <ul style="list-style-type: none"> a. providing walkable places at a human scale with active street life b. prioritising opportunities for people to walk, cycle and use public transport c. co-locating schools, health, aged care, sporting and cultural facilities d. promoting local access to healthy fresh food and supporting local fresh food production.. 	<p>The Planning Proposal will facilitate a land use that promotes public activity and social interaction adjacent to a public open space asset used by the community. A neighbourhood centre at the site will enhance surveillance, territorial reinforcement and space management for St Helens Park Reserve helping to build a safe community with a strong sense of place built on the guidelines of <i>Crime Prevention Through Environmental Design</i>.</p> <p>The delivery of a neighbourhood centre at the site will encourage local residents to walk to their local convenience store or café, making these everyday activities easier and more enjoyable.</p> <p>The co-location of the neighbourhood centre adjoining the constructed St Helens Park Reserve will enhance the community benefit of these two land uses, while further encouraging the use of local pedestrian and cycle paths.</p>
<p>Planning Priority W5: Providing housing supply, choice and affordability, with access to jobs and services</p> <p>Applicable Actions:</p> <ul style="list-style-type: none"> • (15) Prepare local or district housing strategies that address the following: <ul style="list-style-type: none"> a. the delivery of five-year housing supply targets for each local government area b. the delivery of 6–10 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 District d. the housing strategy requirements outlined in Objective 10 of the A Metropolis of Three Cities that include: <ul style="list-style-type: none"> i. creating capacity for more housing in the right locations ii. supporting planning and delivery of growth areas and planned precincts as relevant to each local government area iii. supporting investigation of opportunities for alignment with investment in regional and district infrastructure iv. supporting the role of centres. 	<p>The Planning Proposal will facilitate the delivery of a neighbourhood centre which caters for the needs of the local community whilst facilitating an increase in employment opportunities, housing supply and improving housing choice. The site will make use of existing public transport options. The site will generate new jobs and services for the local community, including a mix of neighbourhood shop uses.</p> <p>The proposed new local neighbourhood centre promotes walkability and a sense of community, providing opportunities for people to interact. The coexistence of multiple uses including retail and residential also increases the vibrancy and viability of the centre.</p> <p>The location of the site at the corner of Appin Road and Kellerman Drive ensures maximum convenience improving productivity, liveability and sustainability of the local community.</p>
<p>Planning Priority W6: Creating and renewing great places and local centres, and respecting the District’s heritage</p> <p>Applicable Actions:</p> <ul style="list-style-type: none"> • (19) Deliver great places by: <ul style="list-style-type: none"> a. prioritising a people-friendly public realm and open spaces as a central organising design principle b. recognising and balancing the dual function of streets as places for people and movement c. providing fine grain urban form, high amenity and walkability d. integrating social infrastructure to support social connections and provide a community hub e. encouraging contemporary interpretation of heritage where possible f. using a place-based and collaborative approach throughout planning, design, development and management. • (21) Identify, conserve and enhance environmental heritage by: <ul style="list-style-type: none"> a. engaging with the community early in the planning process to understand heritage values and how they contribute to the significance of the place b. applying adaptive re-use and interpreting of heritage to foster distinctive local places 	<p>The Planning Proposal will facilitate a land use that promotes public activity and social interaction adjacent to a public open space asset used by the community. A neighbourhood centre at the site will enhance surveillance, territorial reinforcement and space management for St Helens Park Reserve helping to build a safe community with a strong sense of place built on the guidelines of <i>Crime Prevention Through Environmental Design</i>.</p> <p>The proposal will be an attractive addition to the neighbourhood, offering everyday convenience for people of all ages and abilities and a mix of land uses including business and retail uses together with residential shop top housing.</p>

<p>c. managing and monitoring the cumulative impact of development on the heritage values and character of places.</p>	
<p>Productivity</p>	
<p>Planning Priority W7: Establishing the land use and transport structure to deliver a liveable, productive and sustainable Western Parkland City</p> <p>Applicable Actions:</p> <ul style="list-style-type: none"> • (24) Integrate land use and transport plans to deliver the 30-minute city. 	<p>Not applicable.</p>
<p>Planning Priority W9: Growing and strengthening the metropolitan city cluster</p> <p>Campbelltown-Macarthur is developing into Greater Sydney's newest health and medical hub with research and specialist community based care in paediatrics and gastrointestinal disorders. It contains Campbelltown public and private hospitals, Western Sydney University Campbelltown Campus, and TAFE NSW Western Sydney. Collectively, these elements form the health and education precinct and the Collaboration Area also includes Macarthur Square, Campbelltown Mall and surrounding government services.</p> <p>The Collaboration Area will enable a focus on opportunities to generate growth in economic activity, employment and investment. There are opportunities to:</p> <ul style="list-style-type: none"> • protect and grow core health and education activity • provide new research facilities and related commercial premises • plan for complementary uses and increased cultural, creative, digital or technology businesses and employees • establish, enhance and promote the interdependencies between health and education to grow innovation, start-up and creative industries • improve east-west connections and liveability of the area • support affordable housing opportunities for students and moderate-income households. 	<p>The proposal will support and strengthen high level government initiatives in the Campbelltown-Macarthur region through the improved liveability outcomes, housing affordability and job creation.</p>
<p>Planning Priority W11: Growing investment, business opportunities and jobs in strategic centres</p> <p>The growth, innovation and evolution of centres will underpin the economy of the Western City District.</p> <p>Centres provide important services and jobs for local residents and places for communities to meet. Well-planned centres help to stimulate economic activity and innovation through the co-location of activities, provide jobs closer to where people live and use infrastructure more efficiently.</p>	<p>The Planning Proposal is submitted accompanied by an Economic Impact Assessment (produced by MacroPlan Dimasi), with the findings summarised within this report. The proposed neighbourhood centre will provide local convenience shopping which will have a negligible trade impact on the assessed local centres of Rosemeadow, Airds, Bradbury, Ambarvale and Ruse along with the Regional centre of Campbelltown.</p> <p>The proposal will facilitate the delivery of convenience shopping for the local community, while also supporting jobs growth within the local area. A neighbourhood centre at the site will enhance the community benefit and public domain outcomes which emanate from the constructed St Helens Park Reserve.</p>
<p>Sustainability</p>	
<p>Planning Priority W12: Protecting and improving the health and enjoyment of the District's waterways</p>	<p>Waterway health will be maintained through the process of development in accordance with Councils relevant controls.</p>
<p>Planning Priority W15: Increasing urban tree canopy cover and delivering Green Grid connections</p>	<p>The existing site is generally clear of vegetation, with landscape improvement to occur as part of the ultimate development of the site.</p>
<p>Planning Priority W18: Delivering high quality open space</p>	<p>Not applicable. However, the site will provide amenity for the users of the adjoining open space.</p>

4. Is the planning proposal consistent with a Council’s local strategy or other local strategic plan?

Campbelltown Council’s endorsed local strategic plan is *Creating Our Future Together: Campbelltown’s Community Strategic Plan 2013 – 2023*. The Strategic Plan incorporates 5 core objectives and 15 strategies. The core objectives are:

- A sustainable environment,
- A strong local economy,
- An accessible city,
- A safe, healthy and connected community, and
- Responsible leadership.

The Planning Proposal is consistent with all of the relevant themes and directly responds to a number of objectives and strategies.

Objective 2 – A strong local economy incorporates *Strategy 2.2 Attraction of business to the local area to create jobs*. The Planning Proposal will rezone the subject land to *B1 Neighbourhood Centre*, which permits land uses such as a neighbourhood supermarket, neighbourhood shops, food and drink premises and other forms of local business. As such, the proposal is consistent with *Strategy 2.2* as it will contribute to attracting business to the local area and creating jobs for the residents in the area.

The Strategic Plan also incorporates a strong focus on ensuring a safe, healthy and connected community (*Objective 4*) is achieved. *Strategy 4.1* aims to achieve *Objective 4* through provision of a balanced range of services to the community. The Planning Proposal will rezone the site to *B1 Neighbourhood Centre* which will deliver services and facilities to meet the daily needs of the community.

The proposal is also consistent with *Strategy 4.3 – Provision of activities that foster a sense of community spirit* as the land will become a local area of activity that is compatible with the adjoining St Helens Park Reserve.

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

Consistency with the State Environmental Planning Policies and Deemed SEPPs are outlined in Table 5 below.

Table 5: SEPP Assessment

SEPP	Comment	Consistency
State Environmental Planning Policy No 1—Development Standards		Not applicable.
State Environmental Planning Policy No 14—Coastal Wetlands		Not applicable.
State Environmental Planning Policy No 19—Bushland in Urban Areas		Not applicable.
State Environmental Planning Policy No 21—Caravan Parks		Not applicable.
State Environmental Planning Policy No 26—Littoral Rainforests		Not applicable.
State Environmental Planning Policy No 30—Intensive Agriculture		Not applicable.
State Environmental Planning Policy No 33—Hazardous and Offensive Development		Not applicable.
State Environmental Planning Policy No 36—Manufactured Home Estates		Not applicable.
State Environmental Planning Policy No 44—Koala Habitat Protection	The subject land does not contain any vegetation that could support a koala habitat. The site is cleared and does not contain any trees.	Consistent

SEPP	Comment	Consistency
State Environmental Planning Policy No 47—Moore Park Showground		Not applicable.
State Environmental Planning Policy No 50—Canal Estate Development		Not applicable.
State Environmental Planning Policy No 52—Farm Dams and Other Works in Land and Water Management Plan Areas		Not applicable.
State Environmental Planning Policy No 55—Remediation of Land	The site is currently zoned <i>R2 Low Density Residential</i> . All issues in relation to contamination have been resolved prior to this proposal as part of the residential zoning process.	Consistent
State Environmental Planning Policy No 62—Sustainable Aquaculture		Not applicable.
State Environmental Planning Policy No 64—Advertising and Signage	The proposal allows future development to meet the requirements of this SEPP.	Consistent
State Environmental Planning Policy No 65—Design Quality of Residential Flat Development		Not applicable.
State Environmental Planning Policy No 70—Affordable Housing (Revised Schemes)		Not applicable.
State Environmental Planning Policy No 71—Coastal Protection		Not applicable.
State Environmental Planning Policy (Affordable Rental Housing) 2009		Not applicable.
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	The proposal allows future development to meet the requirements of this SEPP.	Consistent
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008	The proposal allows future development to meet the requirements of this SEPP.	Consistent
State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004		Not applicable.
State Environmental Planning Policy (Infrastructure) 2007	The site fronts Appin Road, which is a classified road. The proposal allows future development to meet the requirements of this SEPP.	Consistent
State Environmental Planning Policy (Integration and Reveals) 2016		Not applicable.
State Environmental Planning Policy (Kosciuszko National Park—Alpine Resorts) 2007		Not applicable.
State Environmental Planning Policy (Kurnell Peninsula) 1989		Not applicable.
State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007		Not applicable.
State Environmental Planning Policy (Miscellaneous Consent Provisions) 2007		Not applicable.
State Environmental Planning Policy (Penrith Lakes Scheme) 1989		Not applicable.
State Environmental Planning Policy (Rural Lands) 2008		Not applicable.
State Environmental Planning Policy (State and Regional Development) 2011		Not applicable.

SEPP	Comment	Consistency
State Environmental Planning Policy (State Significant Precincts) 2005		Not applicable.
State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011	The site is not within a Sydney drinking water catchment area.	Not applicable.
State Environmental Planning Policy (Sydney Region Growth Centres) 2006		Not applicable.
State Environmental Planning Policy (Three Ports) 2013		Not applicable.
State Environmental Planning Policy (Urban Renewal) 2010		Not applicable.
State Environmental Planning Policy (Western Sydney Employment Area) 2009		Not applicable.
State Environmental Planning Policy (Western Sydney Parklands) 2009		Not applicable.
Sydney Regional Environmental Plan No 8 (Central Coast Plateau Areas)		Not applicable.
Sydney Regional Environmental Plan No 9—Extractive Industry (No 2—1995)		Not applicable.
Sydney Regional Environmental Plan No 16—Walsh Bay		Not applicable.
Sydney Regional Environmental Plan No 20—Hawkesbury-Nepean River (No 2—1997)	The site is currently zoned for residential purposes and has a service station approved and constructed at the site. The proposal allows future development to meet the requirements of this SEPP.	Consistent
Sydney Regional Environmental Plan No 24—Homebush Bay Area		Not applicable.
Sydney Regional Environmental Plan No 26—City West		Not applicable.
Sydney Regional Environmental Plan No 30—St Marys		Not applicable.
Sydney Regional Environmental Plan No 33—Cooks Cove		Not applicable.
Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005		Not applicable.

6. Is the planning proposal consistent with applicable Ministerial Directions (s.117 directions)?

A review of the consistency of this Planning Proposal with the relevant directions under Section 117 has been undertaken. Each s117 Ministerial Direction is listed below with an annotation stating whether it is relevant to the Planning Proposal and confirming consistency.

Table 6: Consistency with Section 117 Directions

S.117 Direction	Comment	Consistent
1. Employment and Resources		
1.1 Business and Industrial Zones	The proposal will increase the floor space available within the site to provide services and facilities to meet the daily needs of the community.	Consistent

S.117 Direction	Comment	Consistent
	<p>The existing B1 zoned land located on Kellerman Drive within St Helens Park is adjoined by the St Helens Park Public School to the south-west and the St Helens Park Community Centre to the north-east. This land is under the same ownership as that subject of this planning proposal and any impact would be incurred by the same owner. This site is also discussed within the Economic Impact Assessment (refer Appendix 4) which highlights the benefits of commercial facilities at the site subject of this proposal, as opposed to Kellerman Drive. Those include: given its location the Kellerman Drive site is unlikely to capture any reasonable level of expenditure beyond St Helens Park, impacting the viability of establishing a centre at this location; high car ownership levels and the influence of other centres within the region undermine the viability of any supermarket based neighbourhood centre on the B1 zoned site on Kellerman Drive; no retail development has occurred on the Kellerman Drive B1 zoned site since St Helens Park was developed in the 1990s; and the Campbelltown Business Centres Strategy highlights the benefits of a commercial centre being provided at the subject site (corner of Appin Road), as opposed to the B1 zoned site, including the ability to service a larger trade area; exposure to passing trade; greater convenience; and less commercial risk.</p> <p>It has been demonstrated that the retail expenditure is expected to grow within the vicinity, contributed to by the various residential developments which are planned for the area. This growth will contribute to the proposal having a negligible impact on the surrounding centres and therefore the proposal will not adversely impact on the viability of other commercial premises in the region. Further, food catering facilities (restaurants, fast food/takeaway, etc.) are all contained within the Campbelltown-Macarthur Regional City except for some facilities at Rosemeadow incorporating McDonalds and Pizza Hut. Therefore, these are the only catering services available to the St Helens Park community unless they travel to the Regional City centre.</p> <p>The site is appropriately located to support local services for residents within St Helens Park to the east of Appin Road. The proposal will also allow for commercial services that complement the approved service station at the site and proximity to Appin Road.</p>	Consistent
1.2 Rural Zones	The site is zoned <i>R2 Low Density Residential</i> . As such, this Ministerial Direction is not relevant to the proposal.	Not applicable.
1.3 Mining, Petroleum Production and Extractive Industries	This direction does not apply as the Planning Proposal does not propose any modification to the permissibility or operational restrictions relating to extractive industries.	Not applicable.
1.4 Oyster Aquaculture	This Ministerial Direction is not relevant to the proposal.	Not applicable.
1.5 Rural Lands	<i>State Environmental Planning Policy (Rural Lands) 2008</i> excludes land within Campbelltown Shire Council, and therefore, this Ministerial Direction does not apply.	Not applicable.
2. Environment and Heritage		
2.1 Environment Protection Zones	This direction does not apply as the Planning Proposal does not propose any modification to the permissibility or operational restrictions relating to Environmental Protection Zones.	Not Applicable
2.2 Coastal Protection	This Ministerial Direction is not relevant to the proposal.	Not applicable.
2.3 Heritage Conservation	The direction does not apply as no heritage items or areas exist within the subject site.	Not Applicable
2.4 Recreation Vehicle Areas	This Ministerial Direction is not relevant to the proposal.	Not applicable.
3. Housing, Infrastructure and Urban Development		
3.1 Residential Zones	<p>The proposal seeks the delivery of shop top housing which will improve housing choice, diversity and affordability in the area.</p> <p>The nature of shop top housing as a mixed-use development, also ensure the efficient use of existing infrastructure and services while reducing the consumption of land for housing and associated urban development.</p> <p>Further, the proposal seeks the delivery of a landmark building located at a prominent corner, with good design a feature of the proposed concept.</p> <p>Accordingly the proposal meets the ministerial direction.</p>	Consistent
3.2 Caravan Parks and Manufactured Home Estates	This Ministerial Direction is not relevant to the proposal.	Not applicable.

S.117 Direction	Comment	Consistent
3.3 Home Occupations	This Ministerial Direction is not relevant to the proposal.	Not applicable.
3.4 Integrating Land Use and transport	<p>The proposal integrates land uses and transport as it will significantly improve access to services for the St Helens Park community to the east of Appin Road. This proposal has been prepared in consideration of the embellished St Helens Park Reserve to the north and Service Station which is an approved use within the site.</p> <p>The proposal will reduce the local community's dependence on cars as they will be provided with services such as cafes and convenience stores within walking distance and provide an alternative to Rosemeadow Marketplace.</p> <p>The proposal does not require any modifications to the existing road network and is ideally located adjoining Appin Road.</p>	Consistent
3.5 Development Near Licensed Aerodromes	This Ministerial Direction is not relevant to the proposal.	Not applicable.
3.6 Shooting Ranges	This Ministerial Direction is not relevant to the proposal.	Not applicable.
4. Hazard and Risk		
4.1 Acid Sulfate Soils	The site is zoned for residential purposes. The site is not identified as being subject to risk on the Acid Sulfate Soils Planning Maps held by the Department of Planning & Environment, and therefore, this Ministerial Direction is not relevant to the proposal.	Not applicable.
4.2 Mine Subsidence and Unstable Land	This Ministerial Direction is not relevant to the proposal.	Not applicable.
4.3 Flood Prone Land	The site is zoned <i>R2 Low Density Residential</i> and is not identified as flood prone by any study or existing environmental planning instrument.	Consistent
4.4 Planning for Bushfire Protection	The subject land is not identified as bush prone on Campbelltown Council's bushfire prone land map.	Consistent
5. Regional Planning		
5.1 Implementation of Regional Strategies	Revoked 17 October 2017	
5.2 Sydney Drinking Water Catchments	The site is not within a Sydney drinking water catchment listed in this Ministerial Direction.	Not applicable.
5.3 Farmland of State and Regional Significance on the NSW Far North Coast	The site is zoned for residential development.	Not applicable.
5.4 Commercial and Retail Development along the Pacific Highway, North Coast	This Ministerial Direction is not relevant to the proposal.	Not applicable.
5.8 Second Sydney Airport: Badgerys Creek	This Ministerial Direction is not relevant to the proposal.	Not applicable.
5.9 North West Rail Link Corridor Strategy	This Ministerial Direction is not relevant to the proposal.	Not applicable.
5.10 Implementation of Regional Plans	Refer Table 3 of this report for an assessment of the Planning Proposal against the key actions and strategies of the Greater Sydney Region Plan.	Consistent
6. Local Plan Making		
6.1 Approval and Referral Requirements	The Planning Proposal is consistent with this direction as it does not alter any approval or referral requirements.	Consistent
6.2 Reserving Land for Public Purposes	This direction is not applicable as it does not affect land identified under the SEPP to be reserved for public purposes.	Not Applicable
6.3 Site Specific Provisions	This direction is not applicable as it does not propose any site specific provisions.	Not Applicable

S.117 Direction	Comment	Consistent
7. Metropolitan Planning		
7.1 Implementation of the A Plan for Growing Sydney.	The Planning Proposal is consistent with this Ministerial Direction. It meets the objectives of the Metropolitan Strategy through facilitating urban growth by enhancing and providing residential and employment generating development conveniently located for an existing residential community.	Consistent
7.2 Implementation of the Greater Macarthur Land Release Investigation.	The site is located outside the Macarthur Land Release Investigation area.	Not applicable.

6.3.3 Section C – Environmental, Social and Economic Impact

7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The site is located within an existing urban context and includes an existing petrol station. The site has been cleared and is devoid of any critical habitat or threatened species, populations or ecological communities, or their habitats.

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

Possible environmental impacts resulting from the proposed rezoning, include the potential for noise from the commercial operations and overshadowing and overlooking from the envisaged shop top housing.

With regard to noise, the established service station is considered to have the highest impact of any activity that would be permissible under the proposed *B1 Neighbourhood Centre* zone. Impacts relating to the service station have been assessed and managed as part of the development process, and is not a result of this Planning Proposal. Further, it would be reasonable to that other potential uses in the small local neighbourhood centre would have lower levels of impact and typically operate during the more active times of the day. Further, the proposed building would act as a noise buffer from Appin Road to the dwellings adjacent to the eastern boundary of site.

Impacts such as overlooking and overshadowing from the envisaged shop top housing are able to be managed through the detailed design process. Design elements such as ground level screening, screening on the building, high level and obscure windows along with appropriately positioned balconies will provide opportunities to manage the impact of actual or perceived overlooking. Further, upper floor setbacks will reduce opportunities for overlooking, while also mitigating undue overshadowing on neighbouring allotments.

9. Has the planning proposal adequately addressed any social and economic effects?

Comprehensive assessment of the economic impacts associated with the rezoning of land have been undertaken by MacroPlan Dimasi in their report titled 'Appin Road, St Helens Park Economic Impact Assessment, May 2019' (refer to **Appendix 4**).

The Economic Impact Assessment (EIA) reviewed the Proposal, being an additional 1,710m² of retail commercial and business floorspace under a B1 zoning, in the context of nearby local service centres and the Campbelltown-Macarthur Regional City.

To recap, the key findings in the MacroPlan Dimasi EIA outlined in Section 5 of this proposal include:

- i) Total retail expenditure is expected to grow at 1.9% per annum within the primary trade area.
- ii) Food catering facilities (restaurants, fast food/takeaway, etc.) are all contained within the Campbelltown-Macarthur Regional City except for some facilities at Rosemeadow incorporating McDonalds and Pizza Hut. Therefore, these are the only catering services available to the St Helens Park community unless they travel to the Regional City centre.
- iii) The proposed small supermarket based centre has potential to generate sales volumes of \$9.5M per annum at 2021/22, representing 3.1% of the available retail expenditure within the main trade area.

- iv) Trade impacts below 10% are considered to be 'relatively moderate' and impacts below 5% are considered 'minor/negligible'. The proposal is modelled to have a trade impact of 5.3% on the Rosemeadow centre and only minor on the other existing smaller neighbourhood centres.
- v) It is estimated the local neighbourhood centre when operational will create a net increase in jobs of 77.
- vi) Other positive economic benefits including:
 - Increased choice and amenity for the population of the main trade area as well as likely increased competition for the benefit of consumers.
 - More convenient access to new convenience-oriented amenities, to serve both the main trade area population, as well as passing traffic along Appin Road.
 - Reduced travel distances, leading to savings on time for main trade area residents, due to a better provision of retail and non-retail facilities at the local level.
 - Providing jobs near people's homes and consequent economic multiplier impacts, which will boost the local economy.

The social effects resulting from the proposal are positive for the local St Helens Park community. The establishment of a small local neighbourhood centre for the St Helens Park community and the users of St Helens Park Reserve will provide highly accessible local services and facilities, which will be within walking distance for the majority of local residents. This creates shorter travel times, potentially reduces car usage and encourages walking, which has a positive effect on health and wellbeing. There are no significant adverse social effects perceived to result from the Proposal.

6.3.4 Section D – State and Commonwealth Interests

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

The site is connected to essential services infrastructure and is located on a major road that accommodates over 10,000 vehicles per day. The proposed small local neighbourhood centre does not require additional services or road upgrades, and therefore, the proposal is adequately services with public infrastructure.

11. What are the views of the state and Commonwealth public authorities consulted in accordance with the Gateway determination?

The Planning Proposal needs to be considered by Campbelltown City Council for resolution to proceed to Gateway Determination.

Notwithstanding, the Roads & Maritime Services (RMS) has been consulted as part of the Development Application for the approved service station and the various access points to Appin Road, which is a 'Classified Road'. The RMS supported the service station development including the two access points to Appin Road, and it is expected it will be further consulted as part of this rezoning process and any future Development Applications.

6.4 PART 4 – Mapping

As outlined in Section 6.2 of this proposal, the following maps in the Campbelltown LEP 2015 will require creation/amendment:

- Land Zoning maps: Sheet LZN_009A;
- Lot Size maps: Sheet LSZ_009;
- Height of Buildings maps: Sheet HOB_009;
- Lot Size for Dual Occupancy Development Map: Sheet LSD_009
- Additional Permitted Uses Map: Sheet APU_009AB

These proposed amendments are shown at Appendices 3 – 7.

6.5 PART 5 – Community Consultation

Community consultation will be undertaken consistent with Campbelltown Council requirements and the Department of Planning and Environment's Gateway Determination conditions should the Planning Proposal proceed.

6.6 PART 6 – Project Timeline

Below is a suggested project timeline for the Proposal:

Table 7 - Project Timeline

Project Milestone	Timeline
Anticipated commencement date (Gateway Determination)	August 2019
Anticipated timeframe for the completion of required supporting information – post-gateway	September/October 2019
Commencement and completion dates for public exhibition period & government agency consultation – after amending Planning Proposal, if required	October/November 2019
Dates for public hearing, if required	November 2019 (if necessary)
Timeframe for consideration of submissions	December 2019
Timeframe for the consideration of proposal post-exhibition, including amendments and report to Council	January 2019
Date of submission to the Department to finalise the LEP	February 2019

7 CONCLUSION

The purpose of this Planning Proposal is to amend Campbelltown LEP 2015 to allow the establishment of a local neighbourhood centre to complement the service station constructed at the corner of Appin Road and Kellerman Drive. This is to be achieved by rezoning the site from *R2 Low Density Residential* to *B1 Neighbourhood Centre* and through the increase in the permitted building height to 9.0m.

The intended concept will provide local services and facilities for the community of St Helens Park and the users of St Helens Park Reserve, which is being transformed into a Regional Park by Council. The proposal seeks to facilitate local scale business and retail commercial uses servicing the daily needs of the surrounding residential area. Other higher order facilities to satisfy weekly needs can be provided at the Rosemeadow centre or the Campbelltown-Macarthur Regional Centre. Further, the proposal seeks to increase the building height limit within the site for *'shop top housing'*, ensuring the development envisaged through the Concept Plan can be delivered.

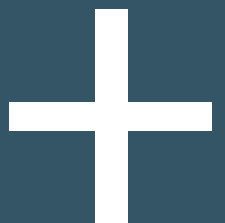
The proposal will significantly improve the amenity and convenience for a significant portion of the St Helens Park and Campbelltown Local Government Area community and provide new job opportunities for local residents, including the youth.

An amendment to Campbelltown LEP 2015 is the most appropriate method to achieve the objectives and intended outcomes of this Planning Proposal. Accordingly, endorsement to progress this Planning Proposal to Gateway Determination by the Campbelltown City Council is sought.

design+
PLANNING

Suite 801, 171 Clarence Street
SYDNEY NSW 2000

PO Box 1778 SYDNEY NSW 2001



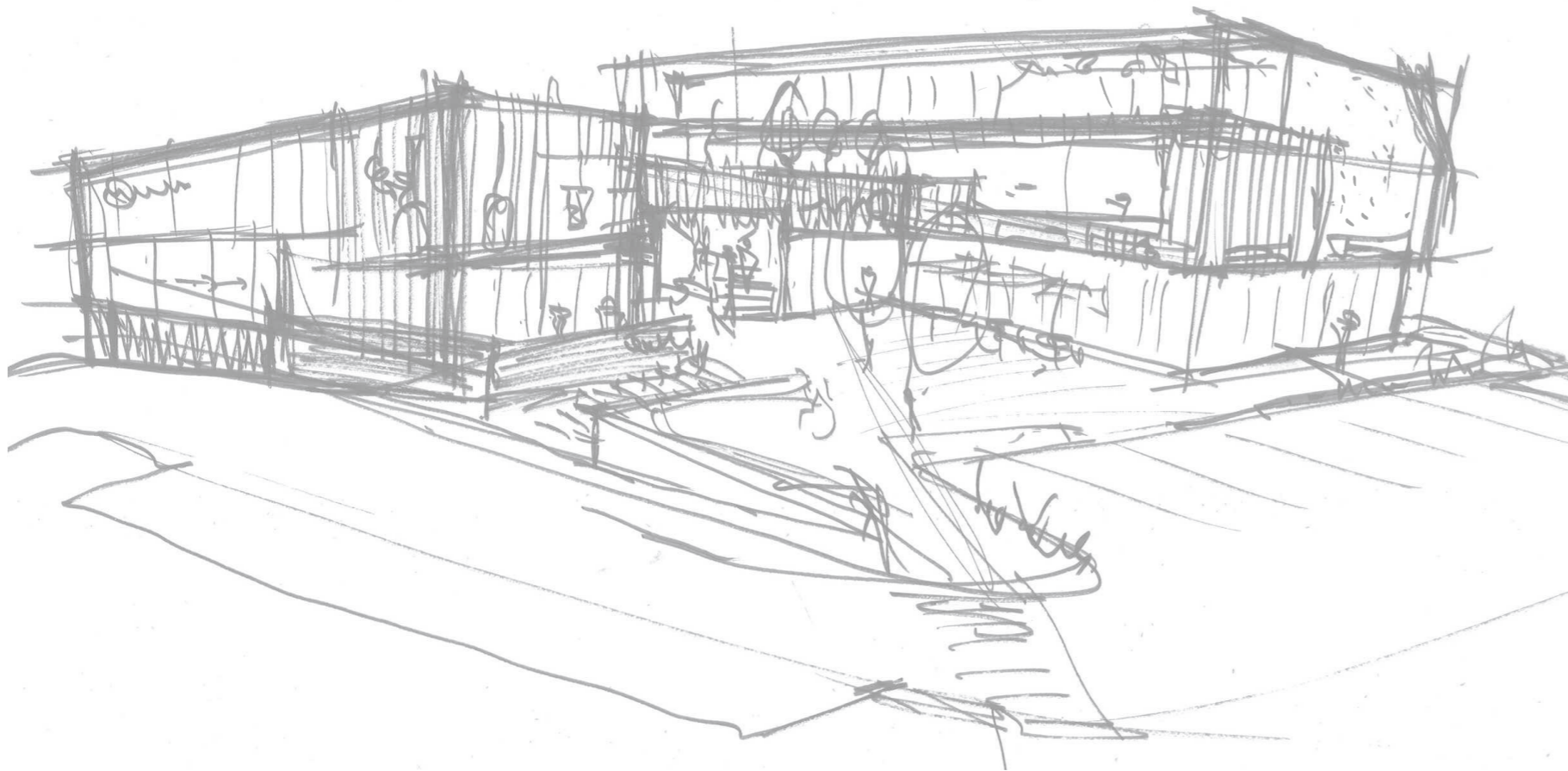
**Appendix 1 Architectural Concept Design (Clarke
Hopkins Clarke – January 2019)**

Concept Package

January 2019

MIR GROUP

Cnr Appin Rd & Kellerman Dr,
Campbelltown NSW 2560





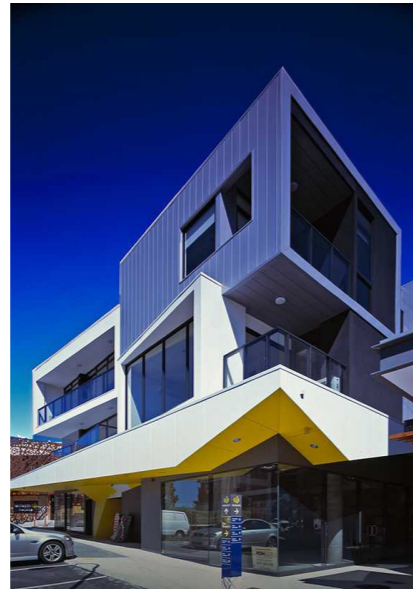
Development Locality

Cnr Appin Rd & Kellerman Dr,
Campbelltown NSW 2560



Precedent Images

Mixed use and sculptural form



Integrated residential and public realm



APPIN

ROAD

KELLERMAN

NTON PLACE

DRIVE

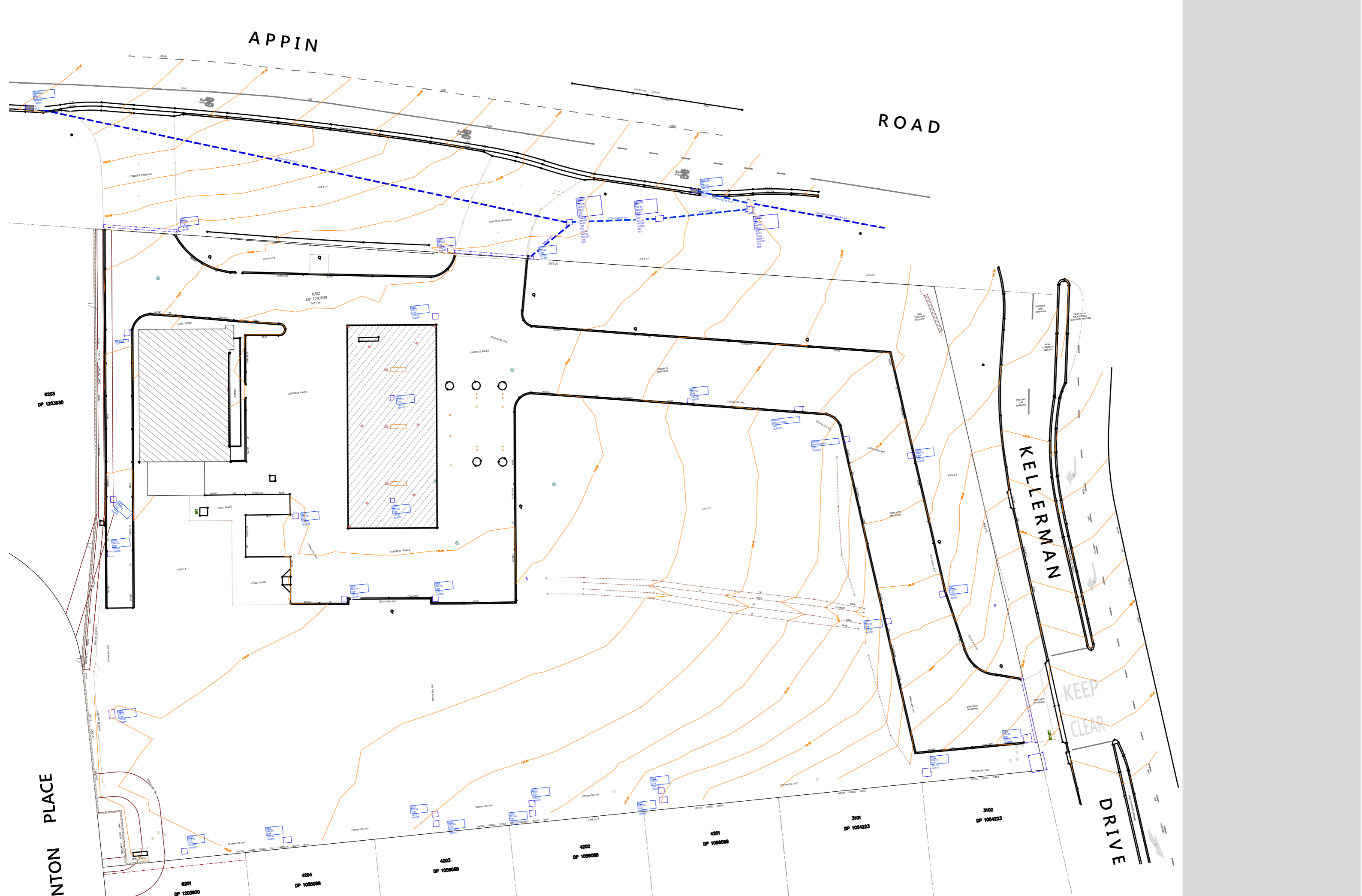
KEEP CLEAR

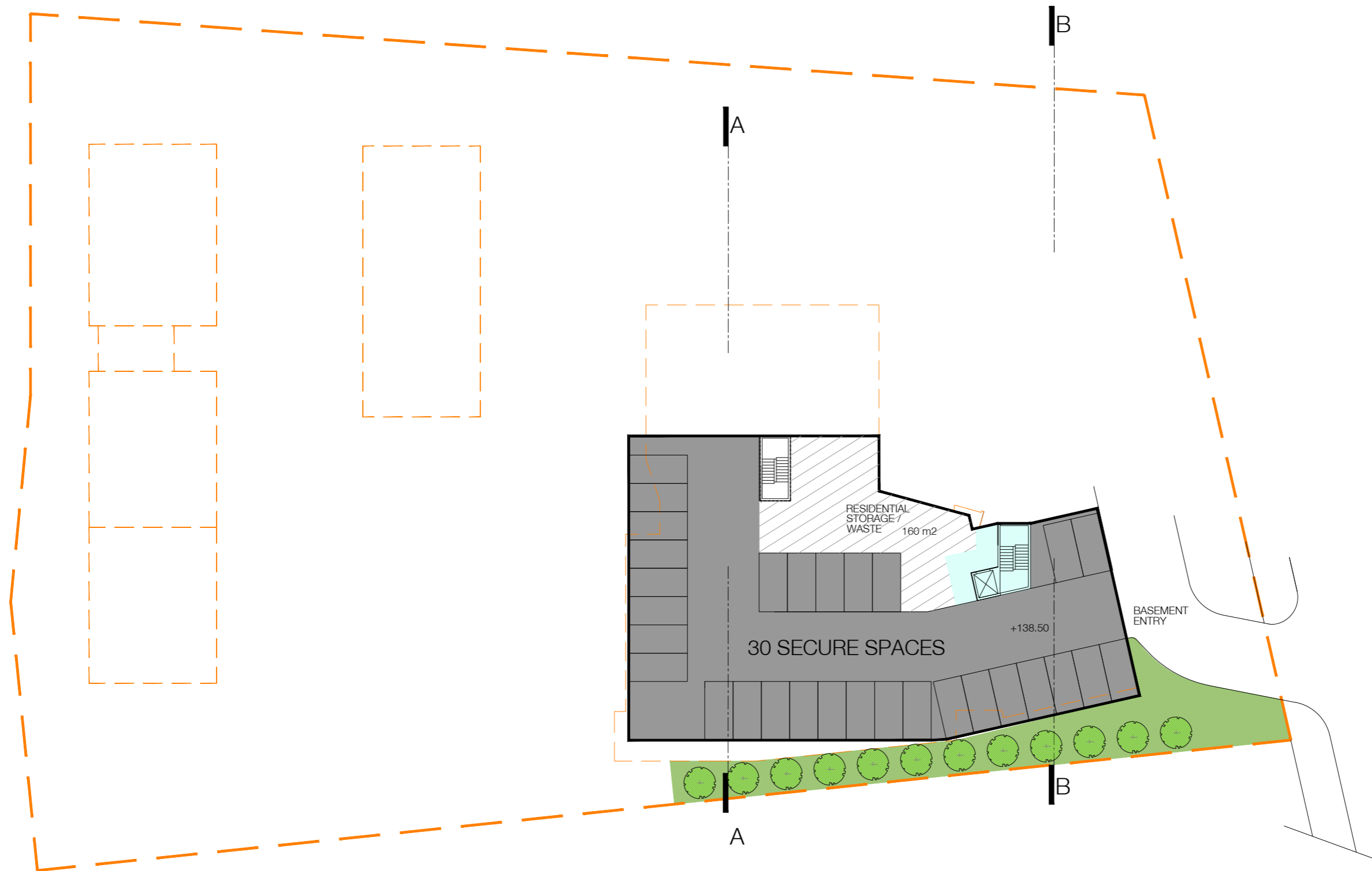
EXISTING CONDITIONS
St. Helens Park Expansion (cnr Appin Road & Kellerman Drive)

ClarkeHopkinsClarke
115 Sackville Street
Collingwood VIC Australia 3066
Telephone (03) 9419 4340
Facsimile (03) 9419 4345
Email studio@chc.com.au
www.chc.com.au



5 October 2018
170164/SK01





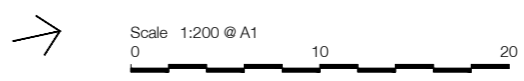
GROUND FLOOR SCHEDULE

FUEL (EXISTING)	200m ²
NEIGHBOURHOOD SUPERMARKET	660m ²
TAKE AWAY (x2)	320m ²
NEIGHBOURHOOD SHOPS (x4)	270m ²
RESTAURANT	210m ²
ON-GRADE PARKING	91 SPACES



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 115 Sackville Street
 Collingwood VIC Australia 3066
 Telephone (03) 9419 4340
 Facsimile (03) 9419 4345
 Email studio@chc.com.au
 www.chc.com.au

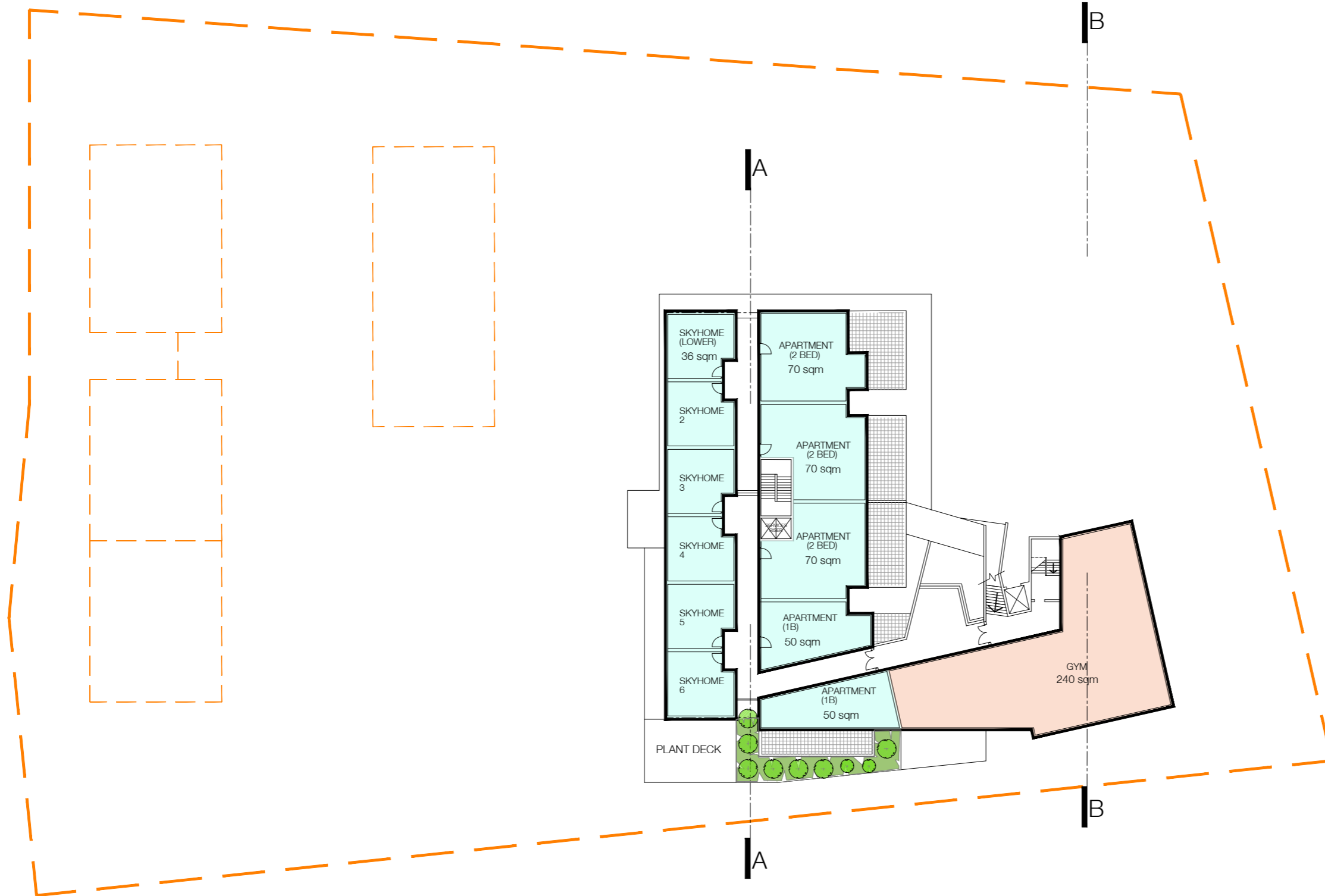
CONCEPT DESIGN_Ground Floor
St. Helens Park Expansion (cnr Appin Road & Kellerman Drive)



January 2019
 170164/SK03
 © ClarkeHopkinsClarke 2002

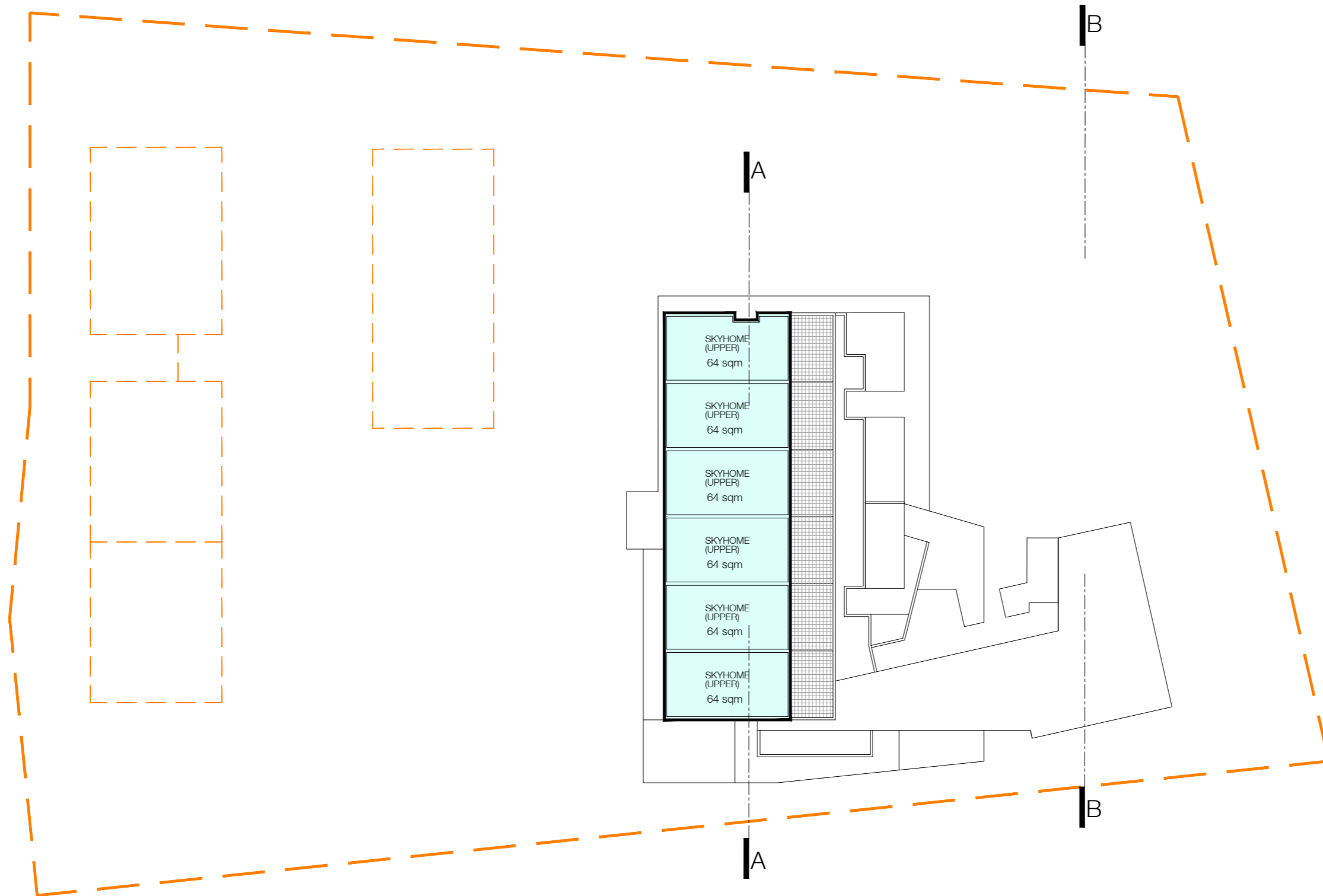
FIRST FLOOR SCHEDULE

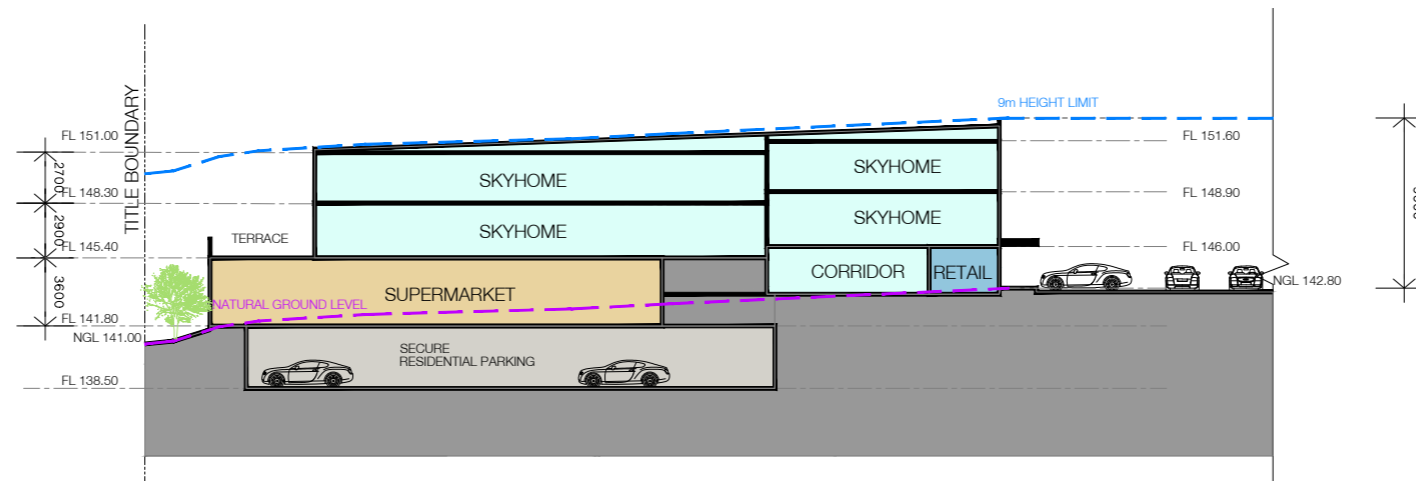
6 NO. SKYHOMES (LOWER LEVEL)	36m2 EA
3 NO. 2 BED APARTMENTS	70m2 EA
2 NO. 1 BED APARTMENTS	50m2 EA
GYM	240m2



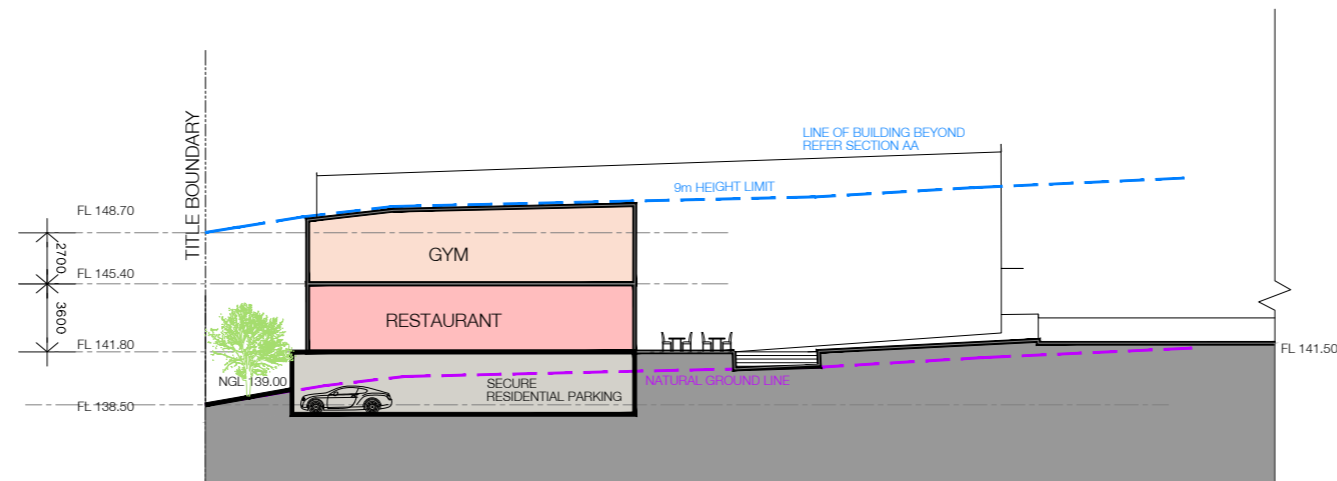
SECOND FLOOR SCHEDULE

6 NO. SKYHOMES
(UPPER LEVEL) 64m² EA





SECTION AA



SECTION BB

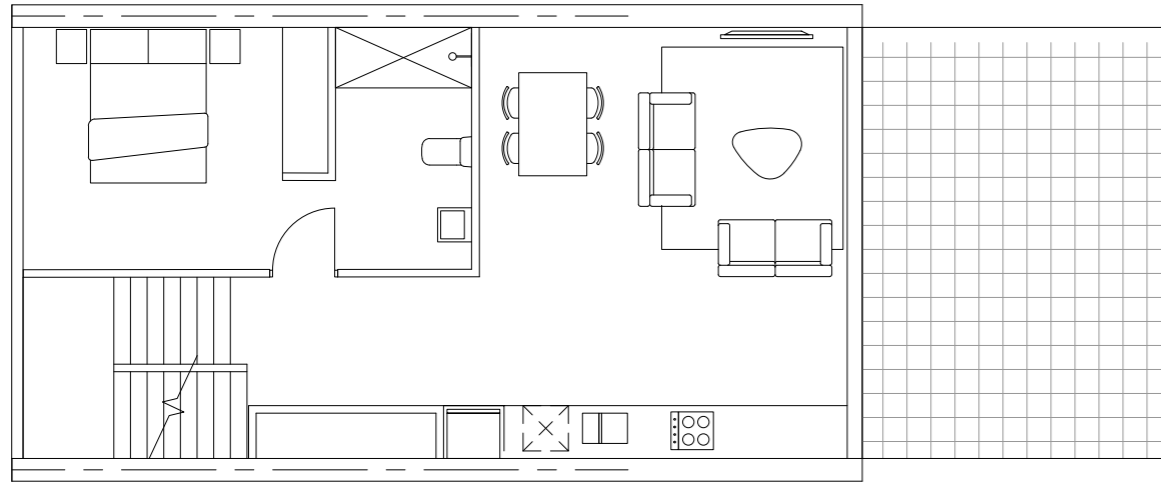


Development Schedule		CAR PARKING			
MIXED USE					
	m ²	COMPLIANT <small>WITH CAMBELLTOWN DCP 2106</small>		DESIGNED	ENGINEERED
SITE AREA (approximate)	7560				
	m ²	RATE	REQ'D		
SERVICE STATION (existing)	200	1/25	8	8	-
NEIGHBOURHOOD SUPERMARKET	660	1/25	27	20	-
TAKE AWAY (160 x 2)	320	1.5/20	24	20	-
NEIGHBOURHOOD SHOPS	270	1/25	11	8	-
RESTAURANT	210	1.5/10	32	28	-
GYM	240	1/25	10	7	-
TOTAL AREA	1,900	-	-		
TOTAL SPACES REQUIRED			112	91	-

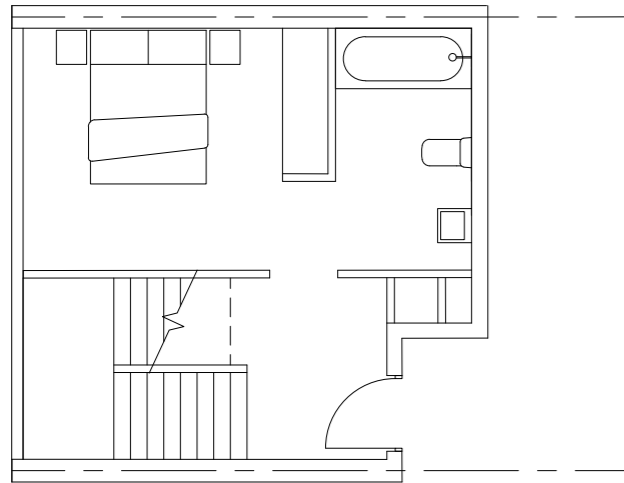
Development Schedule		CAR PARKING			
RESIDENTIAL					
	m ²	COMPLIANT		DESIGNED	ENGINEERED
SITE AREA (approximate)	7560				
RESIDENTIAL					
6# 2-BED SKYHOMES	100	1EA	6	12	-
3# 2-BED APARTMENTS	70	1EA	3	6	-
2# 1-BED APARTMENTS	50	1EA	2	2	-
TOTAL SPACES REQUIRED			11	20	-

Development Schedule			
CAR PARKING			
BASEMENT		30	-
GROUND		91	-
TOTAL SPACES REQUIRED		121	-



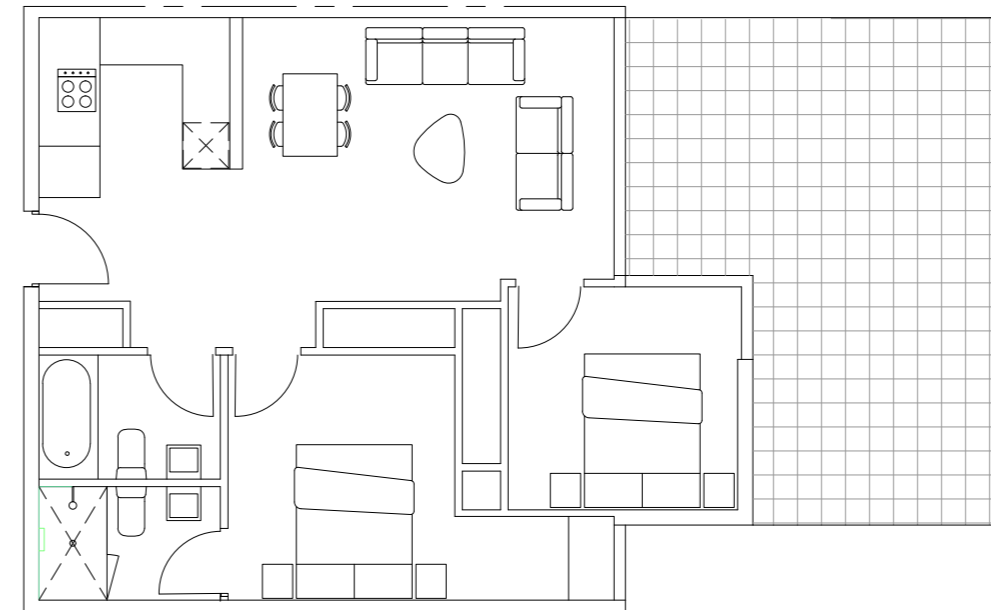


UPPER LEVEL



LOWER LEVEL

TYPICAL SKYHOME LAYOUT

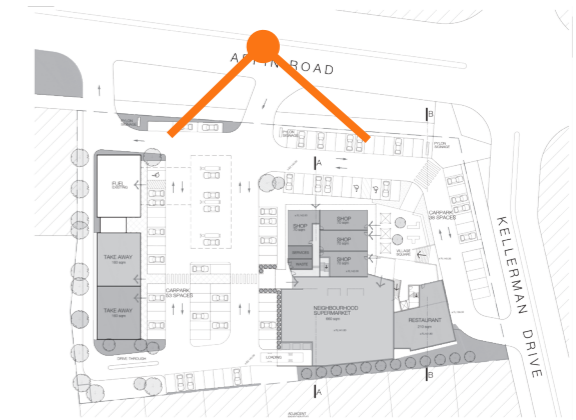


LOWER LEVEL

TYPICAL 2 BED LAYOUT



Massing Images: View from Appin Road



KEY PLAN



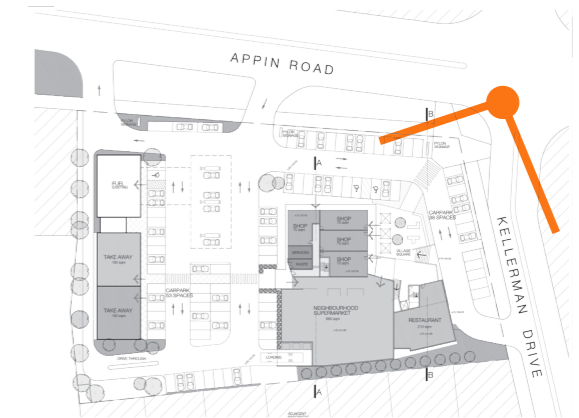
Massing Images: View from Kellerman Drive



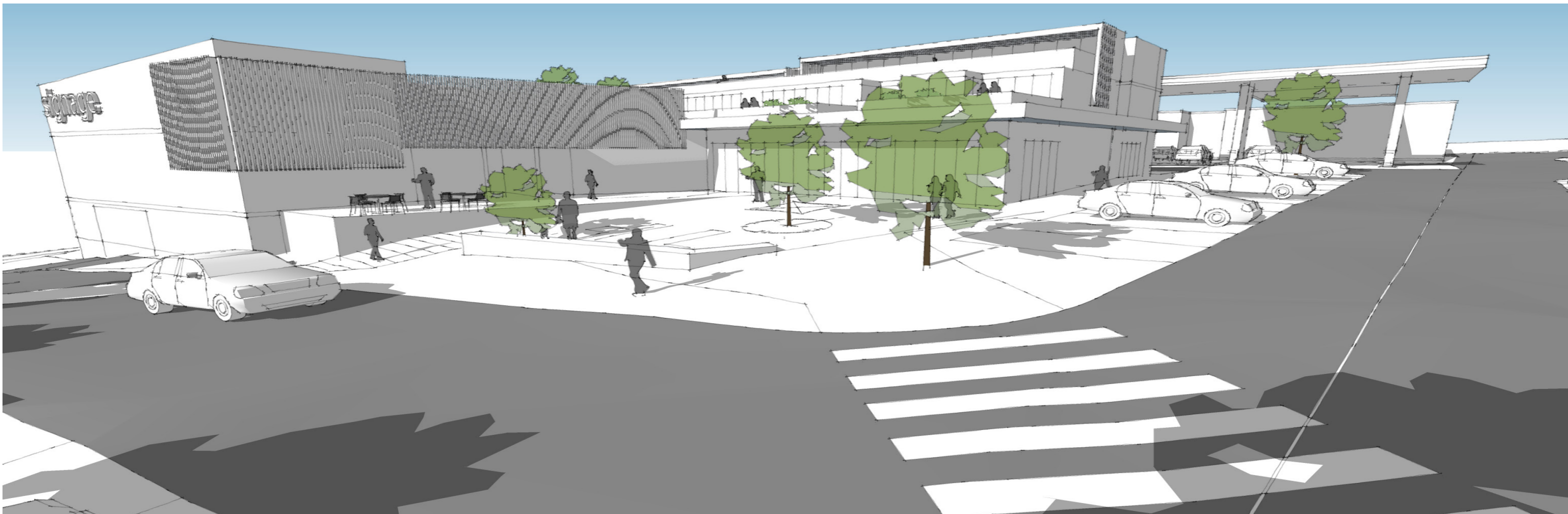
KEY PLAN



Massing Images: View from Main Intersection



KEY PLAN



Massing Images: Aerial Perspective



KEY PLAN

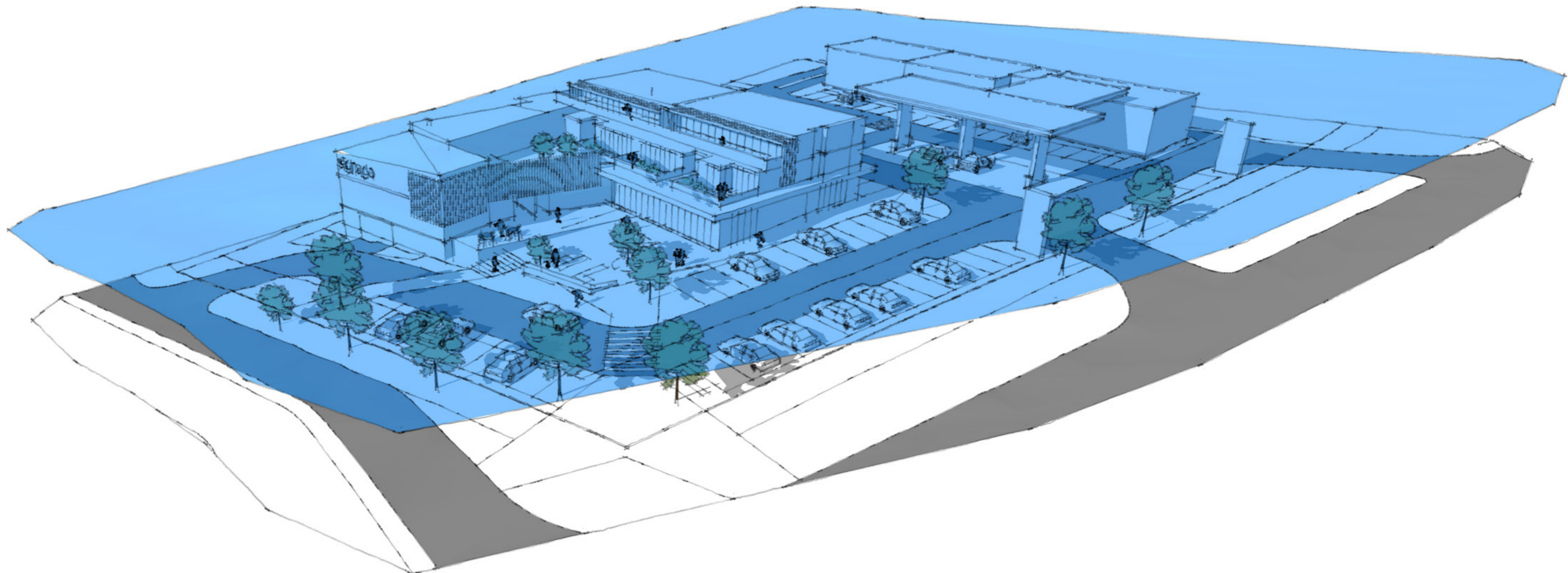


Height Restrictions

■ 9m Height Restriction for B1 Zoning



KEY PLAN



**Appendix 2 Economic Impact Assessment (MacroPlan
Dimasi – May 2019)**

Appin Road, St Helens Park

Economic Impact Assessment

May 2019



MacroPlan

MELBOURNE

Level 16

330 Collins Street

Melbourne VIC 3000

(03) 9600 0500

BRISBANE

Level 15

111 Eagle Street

Brisbane QLD 4000

(07) 3221 8166

PERTH

Level 1

89 St Georges Terrace

Perth WA 6000

(08) 9225 7200

SYDNEY

Level 52

19 Martin Place

Sydney NSW 2000

(02) 9221 5211

GOLD COAST

Level 2

89 - 91 Surf Parade

Broadbeach QLD 4218

(07) 3221 8166

Prepared for: Mir Group of Companies

MacroPlan staff responsible for this report:

Ellis Davies, Senior Manager – Retail

Yvette Burton, Senior Consultant

Table of contents

Executive summary	i
Introduction	v
Section 1: Site context and proposed development	1
1.1 Local and regional context	1
1.2 Proposed development	5
1.3 Review of previous Hill PDA economic study	8
Section 2: Trade area analysis	9
2.1 Trade area definition	9
2.2 Trade area population	12
2.3 Socio-demographic profile	15
2.4 Retail expenditure capacity	18
Section 3: Competition	23
3.1 Existing competition	23
3.2 Proposed competition	26
3.3 Other competition	27
Section 4: Sales potential and trading impacts	29
4.1 Estimated sales potential	29
4.2 Purpose of assessing trading impacts	33
4.3 Impact methodology	33
4.4 Assessment of trading impacts	34
Section 5: Employment and other impacts	38
5.1 Estimated employment creation	38
5.2 Other economic and social impacts	39
5.3 Summary and net community benefit	39

Executive summary

This report presents an independent assessment of the need and demand for a proposed retail and convenience centre at St Helens Park in Campbelltown City Council, as well as analysing the likely impacts from the proposed development on other relevant activity centres throughout the surrounding Macarthur region.

Subject site context and proposed development

- The suburb of St Helens Park is located approximately 45 km south-west of the Sydney Central Business District (CBD) and around 4 km south-east of the Campbelltown-Macarthur Regional City.
- The subject site is located at the south-eastern corner of Kellerman Drive and Appin Road, and is bordered by residential dwellings to the east and a small residential development currently under construction, to the south. Appin Road is a major arterial route in the region, connecting Campbelltown-Macarthur Regional City to the north to Appin in the south, accommodating approximately 9,000 vehicle movements per day.
- The subject site has recently seen the construction and operation of a 24-hour service station and convenience store. The subject site is currently zoned R2 – Low Density Residential. Mir Group seeks a rezoning of the subject site to B1 – Neighbourhood Centre, in order to accommodate a small supermarket-based shopping centre development augmenting the recently completed service station.
- The concept design for the proposed convenience centre comprises a small supermarket, a restaurant, 2 takeaway food outlets, a gymnasium and four specialty tenancies that could accommodate retail and non-retail uses.

Trade area analysis

- The defined main trade area includes one primary sector and one secondary sector. The primary sector includes the suburb of St Helens Park, as well as part of Bradbury, while the secondary sector encompasses the suburb of Rosemeadow.
- The main trade area population is estimated at 18,185 as at June 2019, including 9,860 residents within the primary sector. The main trade area population is estimated to grow by an average of 1.0% per annum over the forecast period, to 20,460 by 2031, including 10,585 persons in the primary sector.
- The main trade area generally comprises young, Australian born families who typically own their own homes and earn below average incomes.
- Total retail expenditure by main trade area residents is expected to grow from \$234 million (including GST) in 2019 to \$293 million by 2031, at an average annual growth rate of 1.9%. Within the primary sector, total retail expenditure capacity is estimated to grow in real terms at an average rate of 1.5% per annum, from \$130 million at 2019 to \$156 million by 2031.

Competitive environment

- The highest-order retail facilities in the region are located within the Campbelltown-Macarthur Regional City, which includes a regional shopping centre (Macarthur Square), a sub-regional shopping centre (Campbelltown Mall), a supermarket based centre (Market Fair) and an extensive retail strip.
- Aside from the higher order retail facilities provided within the Campbelltown-Macarthur Regional City there are a number of smaller, convenience orientated, supermarket based shopping centres within the local area including Rosemeadow, Ambarvale, Bradbury, Airs and Ruse.

- The closest food catering facilities to the subject site are located at Rosemeadow (McDonalds and Pizza Hut), however, these are the only such facilities outside of the Campbelltown-Macarthur Regional City, which accommodates a significant provision of fast food tenants.

Estimated sales potential and potential trading impacts

- We estimate that a small supermarket-based centre at the subject site could potentially achieve a sales volume of \$9.5 million at 2021/22, expressed in constant 2018/19 dollar terms, reflecting an overall market share of available retail expenditure within the main trade area of 3.1%, comprising estimated shares of 4.2% from the primary sector and 1.7% from the secondary sector.
- Given the scale and composition of the proposed development at the subject site, which comprises a small supermarket based shopping centre, the largest impact are expected to be absorbed by the Campbelltown-Macarthur Regional City, which currently attracts a significant proportion of total expenditure generated by the main trade area population and contains the significant majority of food catering/fast food retail in the region, as well as the closest convenience shopping centre, namely Rosemeadow Marketplace. The estimated impact on Rosemeadow Marketplace is still expected to be relatively modest, at 5.3%.
- Impacts on the surrounding smaller centres are all expected to be minor, as these centres typically only draw a small market share of the available main trade area expenditure and perform a different role and function to the proposed development being considered at the Appin Road subject site.
- Overall, the estimated impacts across the identified centres are considered to be within an acceptable range, and when considered in the context of the relative lack of food catering retail facilities in the area, as well as the size, performance and role and function of surrounding centres, would be highly unlikely to result in any reduction in the provision of retail outlets across the region.

Economic benefits

The proposed development at the subject site would generate a range of economic benefits, in particular the following:

- Increased choice and amenity for the population of the main trade area as well as likely increased competition for the benefit of consumers.
- More convenient access to new convenience-oriented amenities, to serve both the main trade area population, as well as passing traffic along Appin Road.
- Reduced travel distances, leading to savings on time for main trade area residents, due to a better provision of retail and non-retail facilities at the local level.
- Providing jobs near people's homes and consequent economic multiplier impacts, which will boost the local economy.

Net community benefit

The proposed development at St Helens Park is expected to have some minor trading impacts on existing facilities in the region, however, the impacts will not be such as to threaten any existing facility's ability to continue operating successfully. A range of economic and social benefits are likely to arise from the proposed development, therefore, it is concluded that a net community benefit will result from the proposed development.

Introduction

This report presents an independent assessment of the need and demand for a proposed retail and convenience centre at St Helens Park in Campbelltown City Council, as well as analysing the likely consequent impacts on other relevant activity centres throughout the surrounding Macarthur region.

The report has been prepared in accordance with instructions from Mir Group, and is structured as follows:

- **Section 1** reviews the local and regional context of the subject site; provides an overview of the proposed development; and presents a high-level review of the previous economic study undertaken by Hill PDA.
- **Section 2** examines the potential trade area to be served by the proposed retail development; provides estimates of current and anticipated population levels within the trade area; analyses the socio-demographic profile of the trade area population; and assesses the current and future estimated retail expenditure volumes generated by trade area residents.
- **Section 3** reviews the competitive context within which the proposed development at the subject site will operate, including all proposed competitive facilities.
- **Section 4** examines the likely sales potential of the proposed retail development; presents our estimates of likely trading impacts on the surrounding retail network; and then discusses the implications of these impacts.
- **Section 5** examines the net community benefits associated with the proposed development, including employment generation and other economic and social benefits.

Section 1: Site context and proposed development

This section of the report reviews the local and regional context of the subject site; provides an overview of the proposed development; and presents a high-level review of the previous economic study undertaken by Hill PDA.

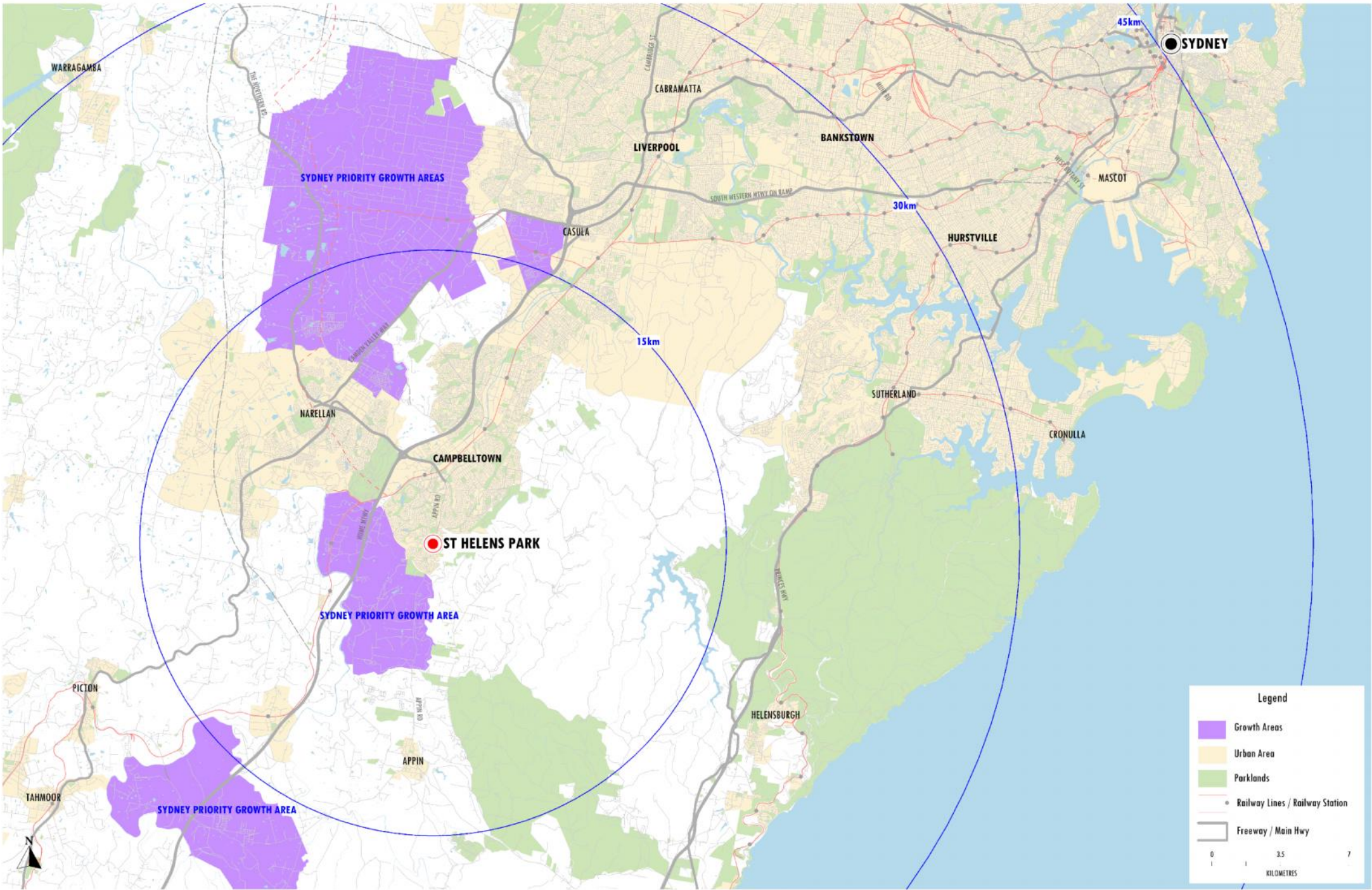
1.1 Local and regional context

The suburb of St Helens Park is in the Campbelltown City Council, located approximately 45 km south-west of the Sydney Central Business District (CBD) and around 4 km south-east of the Campbelltown-Macarthur Regional City as shown on Map 1.1.

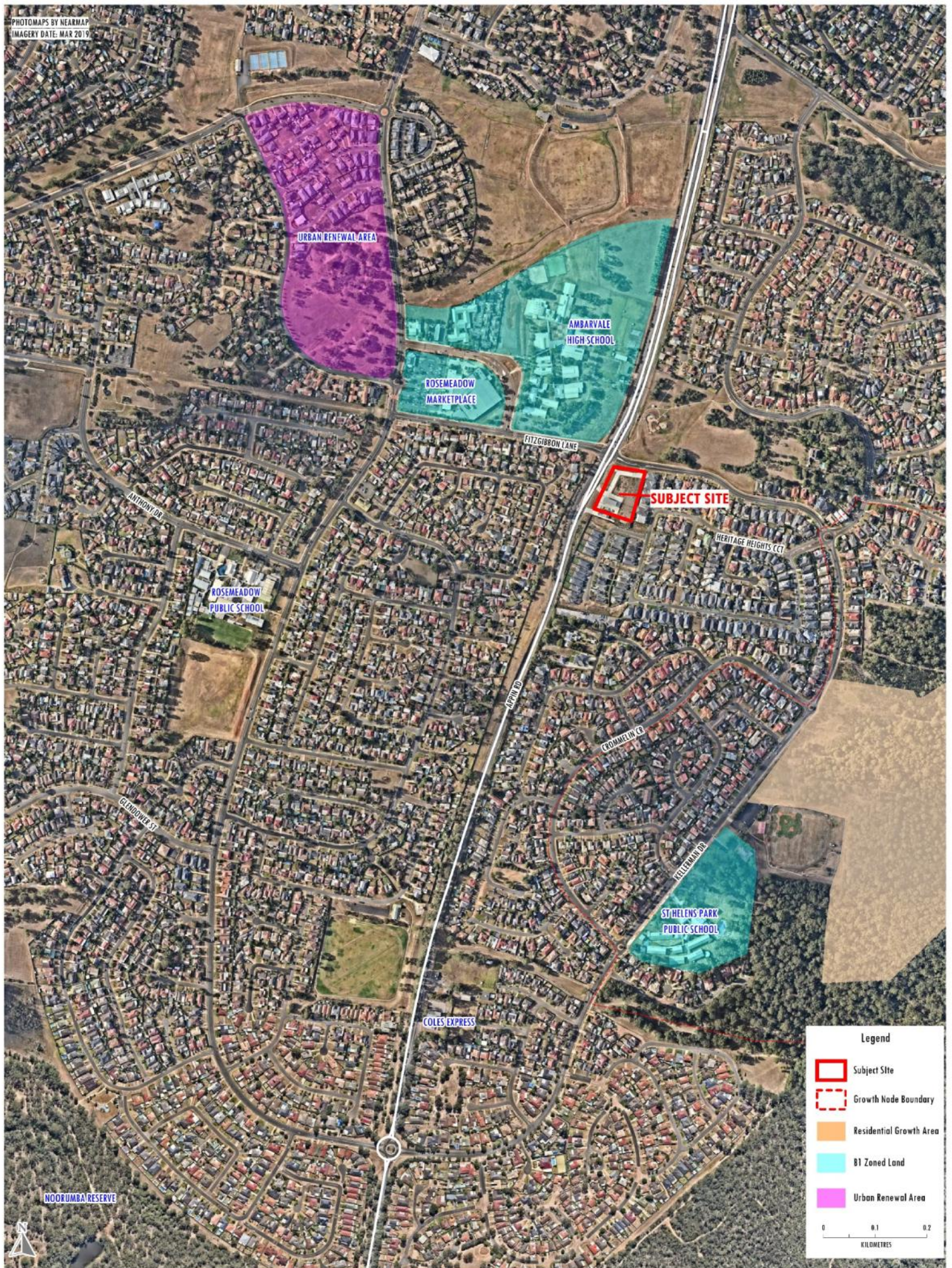
The subject site is located at the south-eastern corner of Kellerman Drive and Appin Road, and is bordered by residential dwellings to the east and a residential development currently under construction, to the south (refer Map 1.2). Appin Road is a major arterial route in the region, connecting Campbelltown-Macarthur Regional City to the north to Appin in the south, accommodating approximately 9,000 vehicle movements per day (VPD).

Completed in early 2018, the southern half of the subject site is now improved with a 24-hour service station and small convenience store. The subject site is located within proximity to Rosemeadow Marketplace, which is anchored by a Woolworths supermarket, and Ambarvale High School.

St Helens Park is the southernmost urban area in the Campbelltown LGA, however, the rural land to the south has been identified as a major future growth corridor. The Greater Macarthur Land Release Investigation area includes the Menangle Park/Mt Gilead Priority Precinct to the immediate south and west of St Helens Park, as well as the Wilton Priority Precinct. The Menangle Park/Mt Gilead precinct could accommodate around 18,000 dwellings over the long term, as well as major employment precincts, major centres, town centres and village centres. Population growth in this area will drive a significant increase in traffic volumes along Appin Road and past the subject site. As shown in Figure 1.1, the 2014 Campbelltown Residential Development Strategy (RDS) has identified “greenfield fringe” urban land for an area to the east of Kellerman Drive, which is expected to be developed over the longer term.



Map 1.1: St Helens Park
Regional context



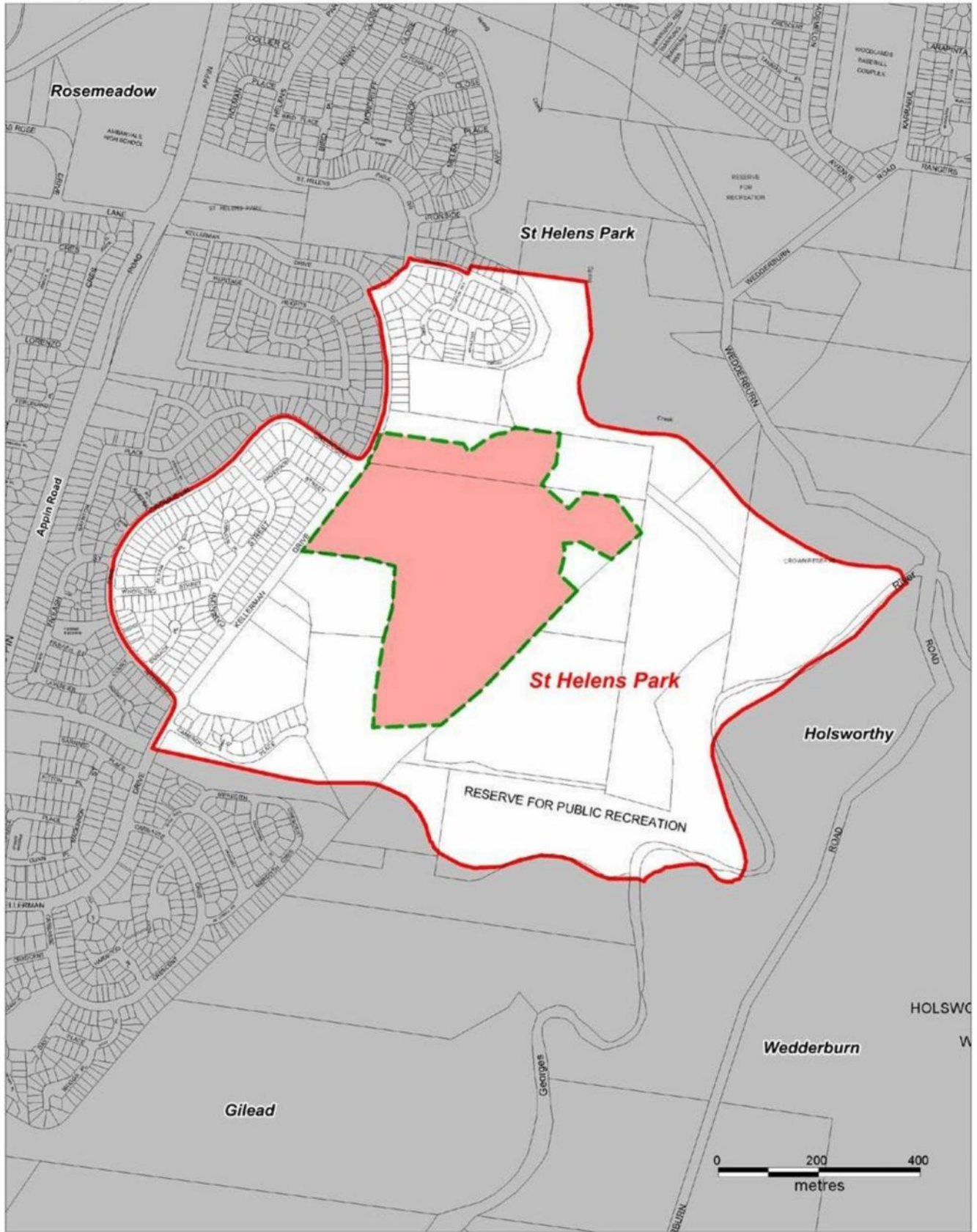
Legend

- Subject Site
- Growth Node Boundary
- Residential Growth Area
- B1 Zoned Land
- Urban Renewal Area

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KILOMETRES

Map 1.2: Appin Road, St Helens Park
Site location

ST HELENS PARK GROWTH NODE Campbelltown Residential Strategy - Infill Areas



LEGEND:



-  Growth Node boundary
-  Potential Development Area (Green Field Fringe)



Figure 1.1

1.2 Proposed development

The Campbelltown Local Environment Plan (LEP) 2015 designates the subject site as R2 – Low Density Residential, however, under Schedule 1 of the LEP, the development of the 24-hour service station and convenience shop was permitted with development consent and was completed in 2018, located on the southern part of the subject site.

A rezoning of the site to B1 – Neighbourhood Centre zoning, would allow for a small convenience centre to be developed on the subject site, as now proposed.

Figures 1.2 and 1.3 show the proposed development, comprising commercial floorspace totalling 1,700 sq.m across two buildings as follows:

- A 660 sq.m supermarket;
- A 210 sq.m restaurant;
- Four specialty tenancies, totalling 270 sq.m floorspace, that could accommodate a range of retail and non-retail uses;
- A 240 sq.m gymnasium located on the first floor; and
- Two 160 sq.m take-away outlets to be situated in close proximity to the existing 24-hr service station.

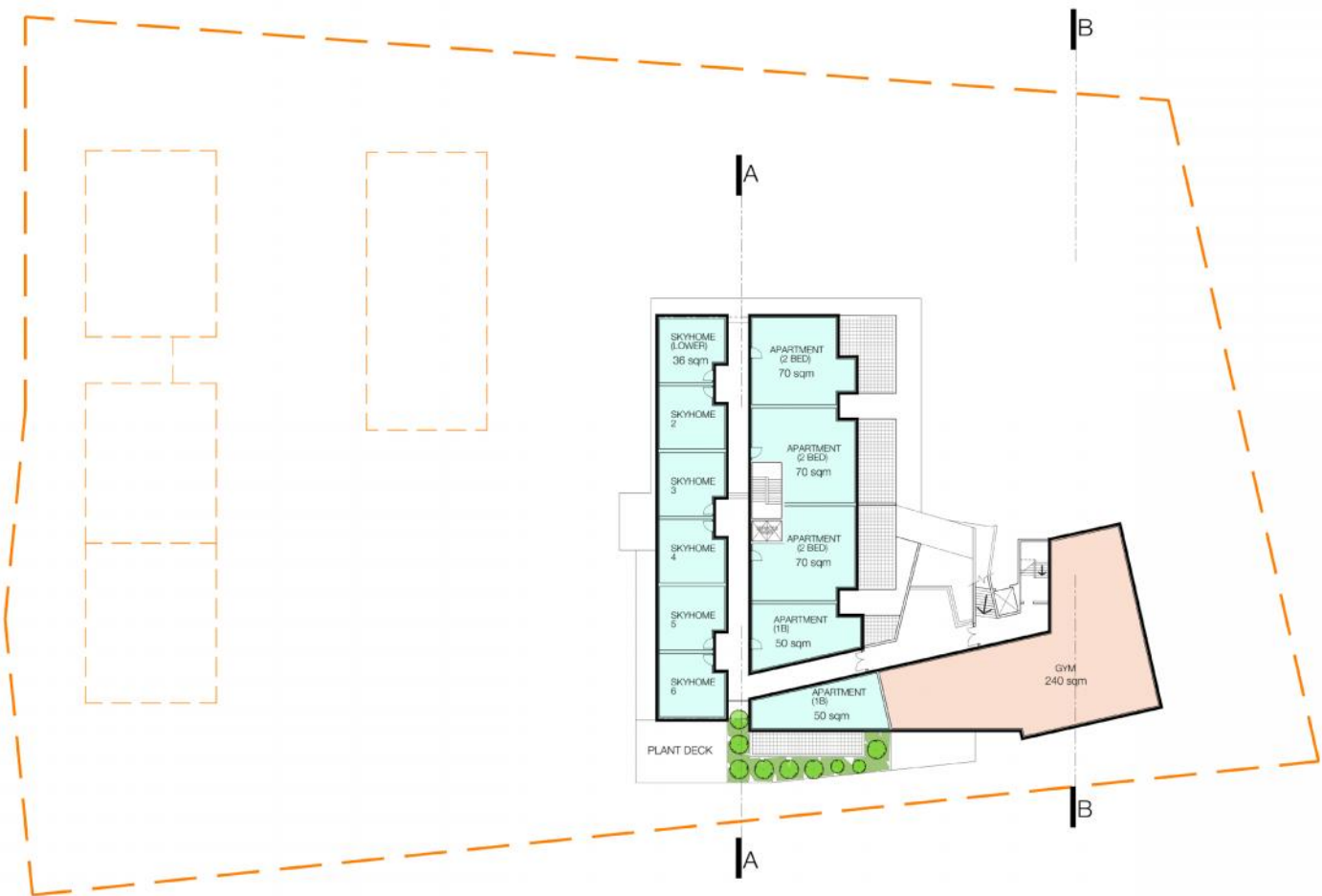
The concept site plan also provides for 91 at-grade car parking with access to the centre proposed via both Appin Road and Kellerman Drive.

In addition to the above, the proposed development is also to include some residential units on the first floor, as shown in Figure 1.3.



Figure 1.2: Appin Road, St Helens Park
 Concept design – ground floor

FIRST FLOOR SCHEDULE		
6 NO. SKYHOMES (LOWER LEVEL)	36m ² EA	
3 NO. 2 BED APARTMENTS	70m ² EA	
2 NO. 1 BED APARTMENTS	50m ² EA	
GYM	240m ²	



Clarke Hopkins
 ClarkeHopkinsClarke
 111 Stockville Street
 Collingwood VIC Australia 3068
 Telephone 03 9419 4340
 Facsimile 03 9419 4345
 Email studio@chc.com.au
 www.chc.com.au

CONCEPT DESIGN_First Floor
 St. Helens Park Expansion (cnr Appin Road & Kellerman Drive)



January 2019
 170164/SK04

Figure 1.3: Appin Road, St Helens Park
 Concept design – first floor

1.3 Review of previous Hill PDA economic study

Hill PDA previously prepared the *Campbelltown City Business Centres Strategy* on behalf of Campbelltown City Council in 2005, as well as a letter, dated 28 October 2014, relating to the development of retail facilities at the subject site. The *Business Centres Strategy* and letter highlight the benefits of retail facilities at the subject site, compared with the existing B1 – Neighbourhood Centre site on Kellerman Drive. Parts of this B1 zoned site are currently occupied by a school and St Helens Park Hall, while the remaining component is vacant.

The key points to note regarding the economic study and letter include the following:

- The B1 zoned site on Kellerman Drive is unlikely to capture any reasonable level of expenditure beyond St Helens Park given its location on Kellerman Drive, inboard from Appin Road. This limits the potential for any retail development to viably establish at the B1 Zoned site.
- High car ownership levels and the influence of other centres within the region undermine the viability of any supermarket based neighbourhood centre on the B1 zoned site on Kellerman Drive.
- No retail development has occurred on the B1 zoned site since St Helens Park was developed in the 1990s.
- The *Campbelltown Business Centres Strategy* highlights the benefits of a commercial centre being provided at the subject site, as opposed to the B1 zoned site, including the ability to service a larger trade area; exposure to passing trade; greater convenience; and less commercial risk.
- It is understood that the vacant part of the B1 zoned site at Kellerman Drive and the subject site are under the same ownership, therefore any impacts on this centre would be incurred by the same owner.

Section 2: Trade area analysis

This section of the report examines the potential trade area to be served by the proposed retail development; provides estimates of current and anticipated population levels within the trade area; analyses the socio-demographic profile of the trade area population; and assesses the current and future estimated retail expenditure volumes generated by trade area residents.

2.1 Trade area definition

The extent of the trade area or catchment that is served by any shopping centre, or retail facility, is shaped by the interplay of a number of critical factors. These factors include:

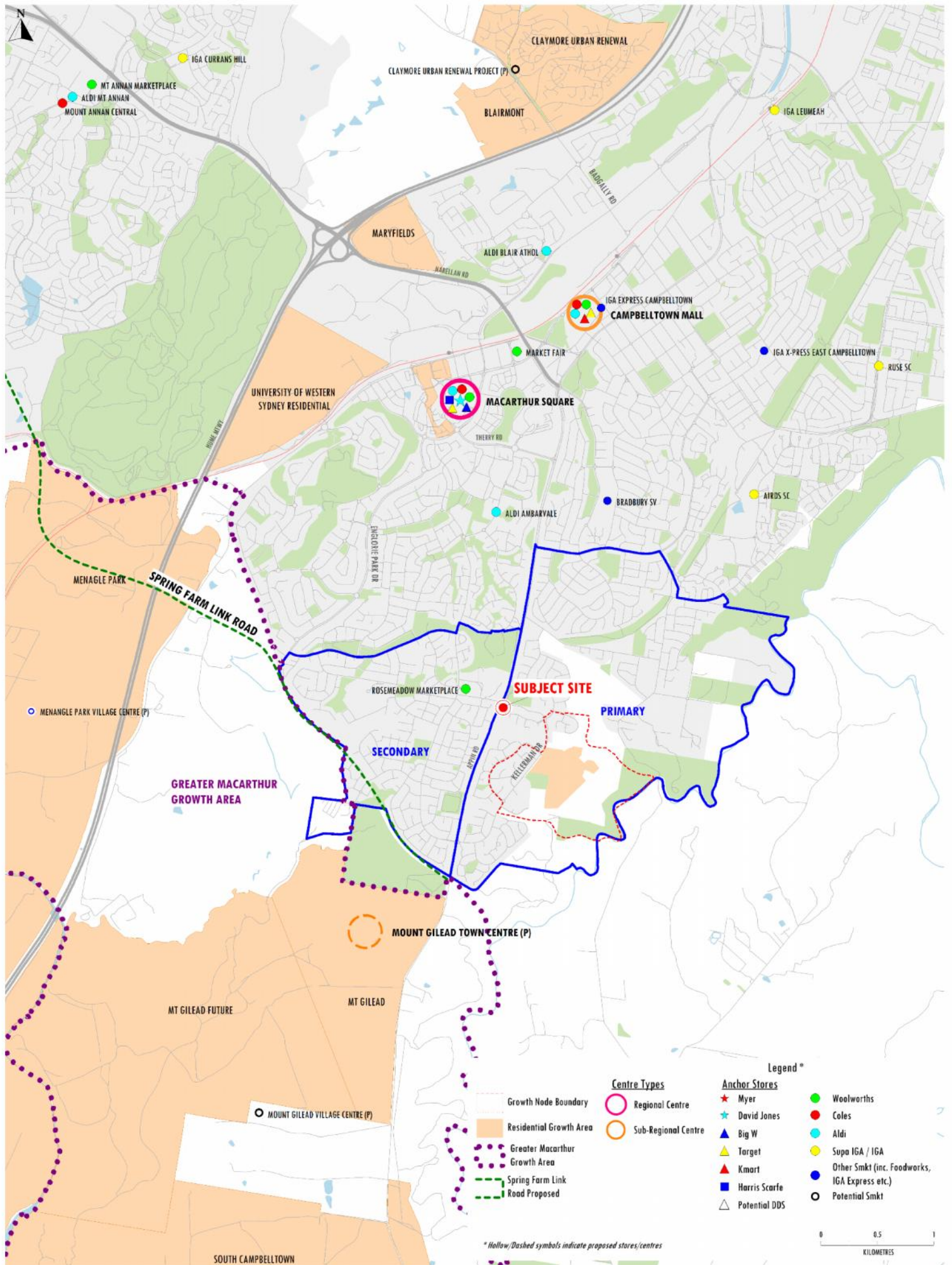
- The relative attraction of the centre, in comparison with alternative competitive retail facilities. The factors that determine the strength and attraction of any particular centre are primarily its scale and composition (in particular the major trader or traders that anchor the centre); its layout and ambience; and car parking, including access and ease of use.
- The proximity and attractiveness of competitive retail centres. The locations, compositions, quality and scale of competitive retail facilities all serve to define the extent of the trade area which a shopping centre is effectively able to serve.
- The available road network and public transport infrastructure, which determine the ease (or difficulty) with which customers are able to access a shopping centre.
- Significant physical barriers which are difficult to negotiate and can act as delineating boundaries to the trade area served by an individual shopping centre.

The trade area has been defined assuming the proposed centre accommodates a mix of uses generally including fast food/take-away retail, some small non-food retail and localised non-retail facilities. The trade area includes one primary sector and one secondary sector, detailed as follows:

- The **primary sector** encompasses the suburb of St Helens Park, as well as part of Bradbury.
- The **secondary sector** encompasses the suburb of Rosemeadow as well as the aged care facility located within Gilead, from which we expect lower market shares to be achieved than the primary sector.

In combination, these sectors are referred to as the **main trade area** throughout the remainder of this report.

The excellent location of Appin Road would mean the proposed retail development would draw a significant proportion of its sales from beyond the defined trade area.



Map 2.1: St Helens Park
Trade area and retail competitive context

2.2 Trade area population

Table 2.1 details the current and projected population levels within the main trade area. This information has been collected from a range of sources, including the following:

- Australian Bureau of Statistics (ABS) Census of Population and Housing (2016);
- ABS Dwelling Approvals Data (2017-18);
- ABS Estimated Residential Population Data (ERP) (2017-18);
- NSW Department of Planning and Infrastructure (DPI) Population projections 2011-2041;
- NSW Bureau of Transport Statistics (BTS) population projections; and
- Other investigations of future residential development undertaken by this office.

Based on the 2016 ABS Census and allowing for recent growth in the area, the main trade area population is estimated at 18,185 as at June 2019, including 9,860 residents within the primary sector.

Key residential developments that will drive population growth in the main trade area in the short to medium term include the following:

- Heritage Heights (primary sector), which borders the subject site to the east and south and is nearing completion.
- As identified in the 2014 Campbelltown Residential Development Strategy (RDS), “greenfield fringe” land to the east of Kellerman Drive (primary sector), is earmarked for future residential development. It is understood that this area could accommodate around 350 lots over the longer term.
- Mount Gilead Estate Retirement Village, currently under construction in the secondary sector. Development within the estate is well underway, with the estate planned to accommodate up to 840 retirement villas and 270 aged care units upon completion. There currently remains approximately 600 villas to be constructed.

- Land within Rosemeadow, around Julius Reserve (secondary sector), is planned for urban renewal and is proposed to yield around 170 lots in total. A number of former social housing dwellings have been demolished in order to accommodate the new development. Site works have commenced with a number of homes under construction.

Furthermore, the Greater Macarthur Land Release Investigation area (to the south-west beyond the trade area) has the potential to accommodate 18,000 dwellings in total over the long term. Within this precinct, an urban release area is identified under the Mount Gilead planning proposal with potential to accommodate approximately 1,500 dwellings. While not within the main trade area, this area will contribute to a significant uplift in vehicle movements along Appin Road and will drive demand for additional retail facilities in the region. A small handful of development applications have been submitted for this urban release area however remain in early stages with completion of each not expected in the short to medium term.

Taking the above into account, we estimate that the main trade area population will grow by an average of 1.0% per annum over the forecast period, to 20,460 by 2031, including 10,585 persons in the primary sector.

Table 2.1						
Appin Rd, St Helens Park trade area population, 2011-2031*						
Trade area sector	Estimated population			Forecast population		
	2011	2016	2019	2021	2026	2031
Primary	9,490	9,710	9,860	9,960	10,210	10,585
Secondary	7,940	8,100	8,325	8,625	9,375	9,875
Main trade area	17,430	17,810	18,185	18,585	19,585	20,460
Trade area sector	Average annual growth (no.)					
	2011-16	2016-19	2019-21	2021-26	2026-31	
Primary	44	50	50	50	75	
Secondary	32	75	150	150	100	
Main trade area	76	125	200	200	175	
Trade area sector	Average annual growth (%)					
	2011-16	2016-19	2019-21	2021-26	2026-31	
Primary	0.5%	0.5%	0.5%	0.5%	0.7%	
Secondary	0.4%	0.9%	1.8%	1.7%	1.0%	
Main trade area	0.4%	0.7%	1.1%	1.1%	0.9%	

*As at June
Source: ABS Census 2016; NSW Department of Planning and Environment 2016; MacroPlan Dimasi

2.3 Socio-demographic profile

Table 2.2 and Chart 2.1 detail the socio-demographic profile of the main trade area population, compared with the respective benchmarks for metropolitan Sydney and Australia, as sourced from the 2016 ABS Census of Population and Housing.

Key points to note regarding the characteristics of the main trade area population include the following:

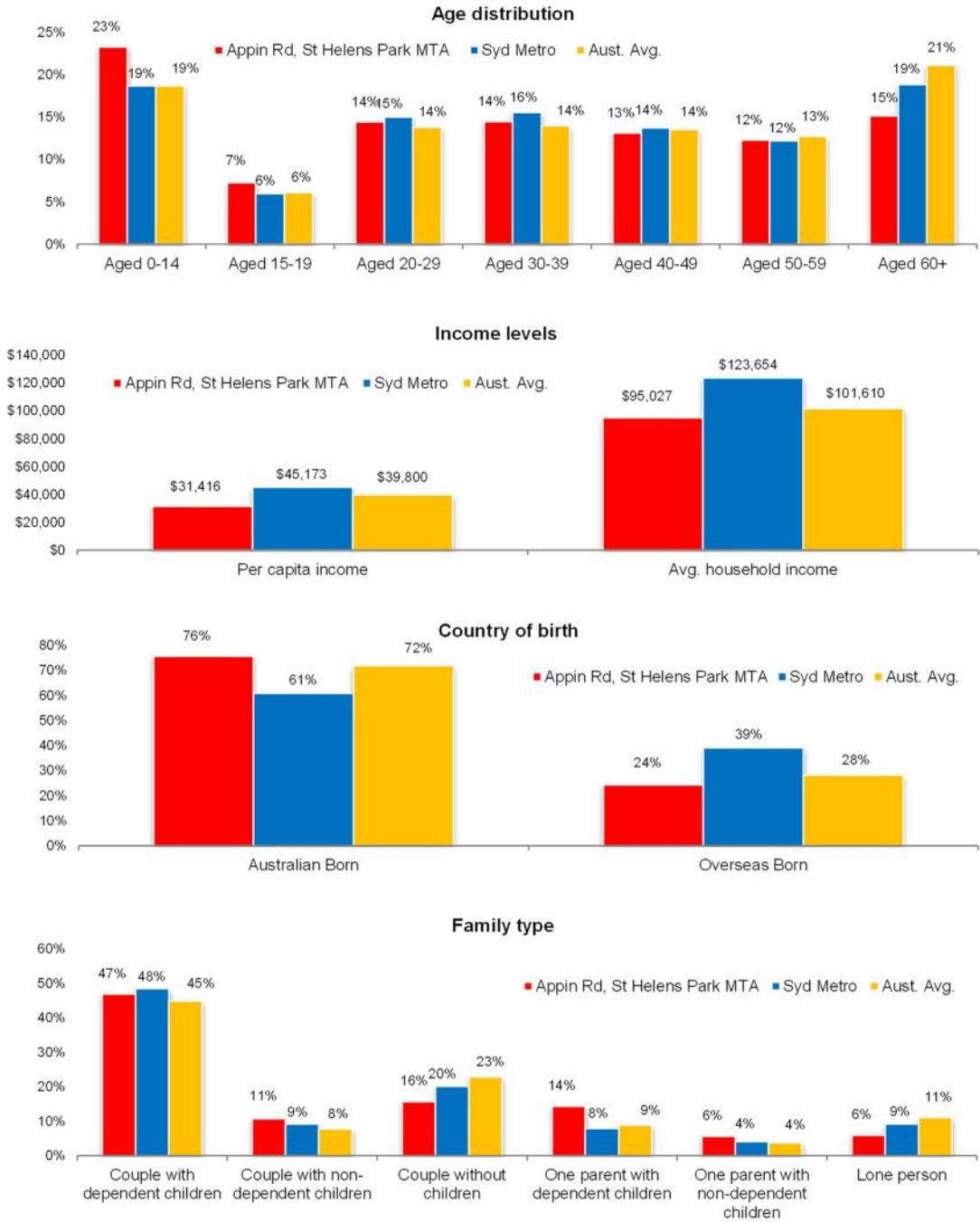
- Main trade area residents earn per capita and average household incomes that are below the respective benchmarks for metropolitan Sydney.
- The average age of main trade area residents, at 34.2 years, is significantly lower than the metropolitan Sydney average of 37.5 years. Children (i.e. residents aged 0 to 14 years) account for almost a quarter of the main trade area population, highlighting the popularity of the area with young families.
- The home ownership level within the main trade area is 69.3%, which is 5.1% higher than the metropolitan Sydney average (64.2%).
- The main trade area population is predominantly Australian born (75.7%).
- Traditional families (i.e. couples with dependent children) account for the largest proportion of main trade area households, at 46.9%.

In summary, the main trade area generally comprises young, Australian born families who typically own their own homes and earn below average incomes.

Table 2.2					
Appin Rd, St Helens Park main trade area - socio-demographic profile, 2016					
Census item	Primary sector	Secondary sector	Main TA	Syd Metro avg.	Aust. avg.
Per capita income	\$32,719	\$29,854	\$31,416	\$45,173	\$39,800
<i>Var. from Syd Metro bmark</i>	-27.6%	-33.9%	-30.5%		
Avg. household income	\$98,088	\$91,286	\$95,027	\$123,654	\$101,610
<i>Var. from Syd Metro bmark</i>	-20.7%	-26.2%	-23.2%		
Avg. household size	3.0	3.1	3.0	2.7	2.6
<u>Age distribution (% of population)</u>					
Aged 0-14	23.5%	23.0%	23.3%	18.7%	18.7%
Aged 15-19	6.8%	7.8%	7.3%	6.0%	6.1%
Aged 20-29	15.0%	13.7%	14.4%	15.0%	13.8%
Aged 30-39	15.1%	13.7%	14.5%	15.5%	14.0%
Aged 40-49	12.9%	13.3%	13.1%	13.7%	13.5%
Aged 50-59	11.6%	13.1%	12.3%	12.2%	12.7%
Aged 60+	15.0%	15.3%	15.2%	18.9%	21.1%
Average age	34.0	34.6	34.2	37.5	38.6
<u>Housing status (% of households)</u>					
Owner (total)	<u>72.2%</u>	<u>65.8%</u>	<u>69.3%</u>	<u>64.2%</u>	<u>67.4%</u>
• Owner (outright)	23.7%	21.3%	22.6%	30.0%	31.9%
• Owner (with mortgage)	48.5%	44.5%	46.7%	34.2%	35.5%
Renter	27.6%	33.5%	30.2%	35.1%	31.8%
<u>Birthplace (% of population)</u>					
Australian born	77.9%	73.0%	75.7%	60.9%	71.9%
Overseas born	<u>22.1%</u>	<u>27.0%</u>	<u>24.3%</u>	<u>39.1%</u>	<u>28.1%</u>
• Asia	5.8%	9.8%	7.6%	19.1%	11.2%
• Europe	6.7%	6.3%	6.5%	9.6%	9.6%
• Other	9.6%	10.9%	10.2%	10.4%	7.4%
<u>Family type (% of population)</u>					
Couple with dep't child.	46.6%	47.3%	46.9%	48.5%	44.8%
Couple with non-dep't child.	10.4%	11.0%	10.7%	9.1%	7.7%
Couple without child.	16.6%	14.5%	15.7%	20.1%	22.8%
One parent with dep't child.	13.8%	15.0%	14.3%	7.9%	8.8%
One parent w non-dep't child.	5.8%	5.3%	5.6%	4.1%	3.7%
Lone person	5.8%	6.1%	5.9%	9.2%	11.0%

Source: ABS Census of Population & Housing, 2016; MacroPlan Dimasi

Chart 2.1
Appin Rd, St Helens Park main trade area - socio-demographic profile, 2016



Source: ABS Census of Population & Housing, 2016; MacroPlan Dimasi

2.4 Retail expenditure capacity

MacroPlan Dimasi estimates retail expenditure capacity generated by the main trade area residents based on information sourced from Market Data Systems (MDS), which utilises a detailed micro simulation model of household expenditure behaviour for all residents of Australia. The model takes into account information from a wide variety of sources including the regular ABS Household Expenditure Surveys, national accounts data, Census data and other information. We consider MarketInfo data to be an accurate measure of available retail expenditure and it is widely relied on in the retail industry.

Total retail expenditure is detailed in a number of categories, as follows:

- Take-home food and groceries – goods typically sold in supermarkets and specialty fresh food stores.
- Packaged liquor – packaged beer, wine and spirits such as those purchased at bottle-shops and liquor outlets.
- Food catering – cafes, take-away outlets and restaurants, including liquor consumed on such premises.
- Apparel – clothing, footwear, fashion and accessories.
- Household Goods – giftware, electrical, computers, furniture, homewares, and hardware goods.
- Leisure – sporting goods, music, DVDs, games, books, newsagents and film processing/photography.
- General Retail – pharmaceutical goods, cosmetics, toys, florists, mobile phones.
- Retail Services – retail services such as key cutting, shoe repairs, hair and beauty.

Chart 2.2 illustrates the estimated per capita retail expenditure levels for the main trade area population across the various retail categories, benchmarked against the metropolitan Sydney and Australian averages. While per capita expenditure on total retail is estimated at 13.5% below the metropolitan Sydney average, per capita expenditure on other food and groceries is 3% above the average. All expenditure estimates in this report include GST.



Table 2.3 presents projections of total retail expenditure generated by the main trade area population, by trade area sector, over the period from 2019 to 2031. Spending forecasts are presented in constant 2018/19 dollars.

Total retail expenditure by main trade area residents is expected to grow from \$234 million in 2019 to \$293 million by 2031, at an average annual growth rate of 1.9%. This average annual growth rate comprises two components, as follows:

- Residential population growth, which is expected to average 1.0% per annum; and
- Real growth in per capita retail expenditure, which is expected to average 0.9% per annum over the forecast period.

The total retail expenditure capacity of primary sector residents is expected to grow in real terms at an average rate of 1.5% per annum, from \$130 million at 2019 to \$156 million by 2031.

Table 2.3			
Appin Rd, St Helens Park main trade area - retail expenditure (\$M), 2019-2031*			
Year ending June	Primary sector	Secondary sector	Main TA
2019	130	103	234
2020	132	106	238
2021	134	109	243
2022	136	112	248
2023	138	115	253
2024	140	118	258
2025	142	121	263
2026	144	124	268
2027	146	127	273
2028	149	129	278
2029	151	132	283
2030	154	134	288
2031	156	137	293
<u>Average annual growth (\$M)</u>			
2019-2031	2.1	2.8	4.9
<u>Average annual growth (%)</u>			
2019-2031	1.5%	2.4%	1.9%

*Constant 2018/19 dollars & including GST
Source: MarketInfo; MacroPlan Dimasi

Table 2.4 presents projections of spending for the main trade area population by retail category. Expenditure on take-home food, groceries and packaged liquor, the key retail category for supermarkets, is estimated at \$110 million at mid-2019, and accounts for 47% of all retail expenditure in the main trade area.

Table 2.4
Appin Rd, St Helens Park main trade area - retail expenditure by category (\$M), 2019-2031*

Year ending June	FLG	Food catering	Apparel	Household goods	Leisure	General retail	Retail services	Total retail
2019	110	31	23	37	10	18	6	234
2020	112	31	23	38	10	18	6	238
2021	115	32	23	38	10	18	6	243
2022	117	33	24	39	10	19	6	248
2023	120	34	24	40	10	19	6	253
2024	122	35	25	40	10	19	6	258
2025	125	36	25	41	10	20	7	263
2026	127	37	25	42	11	20	7	268
2027	130	38	26	43	11	20	7	273
2028	132	38	26	43	11	20	7	278
2029	135	39	26	44	11	21	7	283
2030	137	40	27	45	11	21	7	288
2031	140	41	27	45	11	21	7	293
Average annual growth (\$M)								
2019-2031	2.4	0.9	0.4	0.7	0.2	0.3	0.1	4.9
Average annual growth (%)								
2019-2031	2.0%	2.5%	1.5%	1.7%	1.5%	1.5%	2.0%	1.9%

*Constant 2018/19 dollars & including GST
Source: MarketInfo; MacroPlan Dimasi

Retail expenditure category definitions:

- FLG: take-home food and groceries, as well as packaged liquor.
- Food catering: expenditure at cafes, take-away food outlets and restaurants.
- Apparel: clothing, footwear, fashion accessories and jewellery.
- Household goods: giftware, electrical, computers, furniture, homewares and hardware goods.
- Leisure: sporting goods, music, DVDs, computer games, books, newspapers & magazines, stationery and photography equipment.
- General retail: pharmaceutical goods, cosmetics, toys, florists, mobile phones and pets.
- Retail services: hair & beauty, optical goods, dry cleaning, key cutting and shoe repairs.

Section 3: Competition

This section of the report reviews the competitive context within which the proposed development at the subject site would operate, including all proposed competitive facilities.

3.1 Existing competition

Table 3.1 summarises the competitive environment of relevance to future retail facilities at the St Helens Park subject site, the majority of which are located beyond the main trade area.

The highest order retail facilities in the region are located within the **Campbelltown-Macarthur Regional City**, which includes a regional shopping centre (Macarthur Square), a sub-regional shopping centre (Campbelltown Mall), a supermarket based centre (Market Fair), and an extensive retail strip including an IGA supermarket.

Macarthur Square is a major regional shopping centre anchored by a David Jones department store, Big W and Target discount department stores and Coles, Woolworths and Aldi supermarkets, and accommodates over 107,000 sq.m of total floorspace, of which approximately 90,000 sq.m is retail floorspace. The centre underwent major redevelopment in 2017, which saw the net addition of approximately 16,000 sq.m, making it the largest shopping centre in outer south-west Sydney. The redevelopment saw the addition of an Aldi supermarket, additional mini-majors and new specialty retailers, as well as expanded and relocated Target and Coles stores. The centre also contains cinemas and other entertainment and leisure uses such as Kingpin Bowling and Fernwood Gym.

Campbelltown Mall contains 40,000 sq.m of retail floorspace and is anchored by Target and Kmart discount department stores, as well as Coles, Woolworths and Aldi supermarkets. The centre is supported by 93 specialty stores across two levels.

Aside from the higher-order retail facilities provided within the Campbelltown-Macarthur Regional City, there are a number of smaller, convenience orientated, supermarket based shopping centres within the local area, the majority located north of the subject site, including the following:

- **Rosemeadow Marketplace (secondary sector)** is anchored by a 3,660 sq.m Woolworths supermarket and contains around 7,500 sq.m of retail floorspace in total. The centre is the only shopping centre located within the main trade area and primarily accommodates a convenience oriented retail specialty offer including a bakery, a butcher, a café, a newsagency, a pharmacy and retail services, as well as The Reject Shop and a medical centre. The centre also accommodates a McDonalds restaurant on a pad site.
- A standalone Aldi supermarket of approximately 1,350 sq.m is located at **Ambarvale** as well as a limited provision of street based retailing (i.e. bottleshop, hairdresser and tobacconist).
- **Bradbury Shopping Village** is anchored by a 1,500 sq.m Foodworks supermarket. The centre is estimated to accommodate approximately 2,500 sq.m of retail floorspace in total, including convenience and service based retailers as well as a pharmacy and medical centre.
- **Airds Shopping Centre** is a dated local centre with a Friendly Grocer foodstore and a small number of specialty stores, with many of the tenancies at the centre currently vacant. The suburb is currently undergoing urban renewal with new residential housing in the immediate area being progressively developed. The Newbrook estate at completion will comprise 70% privately owned homes with 30% retained for public housing. As development continues in the area, average incomes will improve, particularly as young families move into the estate. The masterplan for the area provides for a new Airds Town Centre which is expected to be anchored by a mid-sized supermarket and include a range of specialty shops and services.
- **East Campbelltown** accommodates a small (200 sq.m) IGA X-Press foodstore, as well as a convenience retail offer comprised of a bakery, takeaway food outlets and a hair/beauty salon.

- **Ruse Village Shopping Centre** accommodates an IGA supermarket, as well as a bottle shop, a bakery, a butcher, a newsagency, post office, pharmacy and a small takeaway food outlet.
- **Appin** includes a standalone IGA supermarket of around 1,200 sq.m and a small collection of specialty shops.

Table 3.1 Appin Rd, St Helens Park - schedule of competing retail facilities			
Centre	Retail GLA (sq.m)	Major traders	Dist. by road from subject site (km)
Regional centres			
<i>Campbelltown-Macarthur RC</i>	<i>165,000</i>		4.0
• Macarthur Square	90,000	David Jones, Big W, Target, Woolworths, Coles, Aldi	
• Campbelltown Mall	40,000	Kmart, Target, Woolworths, Coles, Aldi	
• Market Fair	10,000	Woolworths	
• Other (incl. Blair Athol)	25,000	IGA	
Other centres			
Rosemeadow Marketplace	7,500	Woolworths	0.8
Ambarvale	1,500	Aldi	2.3
Bradbury Shopping Village	2,500	Foodworks	2.9
Airds SC	1,000	Friendly Grocer	4.2
East Campbelltown	600	IGA X-Press	5.3
Ruse Village SC	1,300	IGA	6.1
Appin	1,700	IGA	11.3
Future retail facilities			
Mt Gilead Town Centre	10,000-20,000	Supermarket (p)	2.1
Airds Town Centre	approx. 5,000	Supermarket (p)	4.2

Source: Property Council of Australia; MacroPlan Dimasi

3.2 Proposed competition

As outlined in the *Greater Macarthur Land Release Preliminary Strategy*, the Mt Gilead urban release area is proposed to accommodate a Town Centre, including 10,000 – 20,000 sq.m of retail/commercial floorspace. We consider it likely that such a Town Centre development would be staged as population establishes in its immediate primary sector and might include a supermarket and supporting convenience orientated specialty retail facilities in the initial stages. Planning for residential subdivision is now underway with development applications submitted for the Mt Gilead estate to be developed in four stages. At present, there are no development applications submitted for any retail facilities.

The **Mt Gilead Town Centre** will ultimately be the main convenience retail shopping destination for the future residents of Mt Gilead, however, it will not capture all expenditure from this new population, and indeed, until this centre establishes other retail facilities in the locality will service the demand generated by the residents in Mt Gilead.

As previously mentioned, the existing Airds Shopping Centre is earmarked for redevelopment to become the **Airds Town Centre** for the new residential estate Newbrook Estate, which is currently underway. It is expected to be able to sustain a mid-sized supermarket a range of specialty stores.

The Mt Gilead retirement village has been mooted to accommodate around nine retail tenancies, however no development applications have been submitted. If these were to be developed in the longer term they are expected to be of little competitive relevance to the development of retail facilities at the subject site as they would primarily serve the immediate resident population of the retirement village.

3.3 Other competition

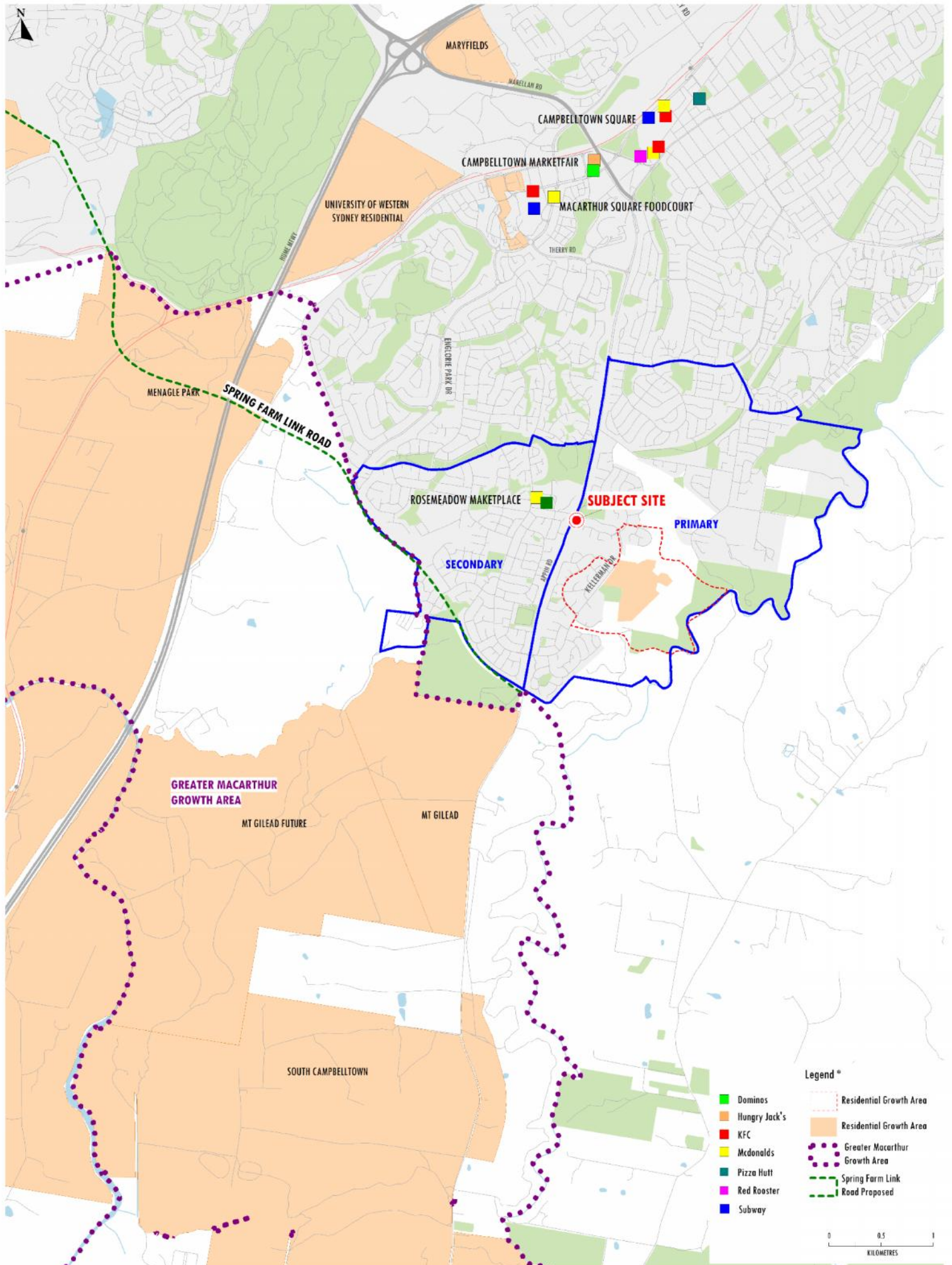
Fast food

Table 3.2 details the major brand fast food outlets within the main trade area, while Map 3.1 illustrates their locations.

The closest food catering facilities to the subject site are located at Rosemeadow (McDonalds and Pizza Hut) and are the only such facilities outside of the Campbelltown-Macarthur Regional City in the surrounding area. The Campbelltown-Macarthur Regional City is located some 4 km from the subject site, and while it accommodates a significant provision of fast food tenants it does not offer a convenient provision for main trade area residents.

Table 3.2 Appin Rd, St Helens Park - schedule of competing fast food facilities		
Centre	Major traders	Dist. by road from subject site (km)
Within trade area		
Rosemeadow	McDonalds, Pizza Hut	0.8
Beyond trade area		
Campbelltown-Macarthur	McDonalds (3), Hungry Jacks, Oporto (2), Red Rooster (2), Subway (3), KFC (3), Dominos Pizza Hut	4.0

Source: MacroPlan Dimasi



Map 3.1: St Helens Park
Competitive fast food facilities

Section 4: Sales potential and trading impacts

This section of the report examines the likely sales potential of the proposed retail development, presents estimates of likely trading impacts on the surrounding retail network and discusses the implications of these impacts.

4.1 Estimated sales potential

The sales performance of any particular retail facility, be it an individual store or a collection of stores provided in a shopping centre or precinct, is determined by a combination of the following factors:

- The quality of the facility, with particular regard to the major trader/traders which anchor the centre; the strength of the tenancy mix relative to the needs of the catchment which it seeks to serve; the physical layout and ease of use; the level of accessibility and ease of parking; and the atmosphere/ambience of the centre.
- The size of the available catchment which the centre seeks to serve. This factor sets the upper limit of the sales potential able to be achieved by the centre or store.
- The location and strengths of competitive retail facilities and the degree to which those alternative facilities are able to effectively serve the needs of the population within the relevant trade area.

The key considerations for estimating the sales potential for the proposed Appin Road retail facility including the following:

- The accessibility and location of the subject site on Appin Road, a key traffic thoroughfare in the surrounding area, as well being located on the corner of Kellerman Drive, which ensures the site is easily accessible from the surrounding residential area. Overall, the site is conveniently situated and is well exposed, which ensures that a future retail centre at the subject site will be well placed to service surrounding residents.

- The planned scale of the retail offer, which is to include a small supermarket and a range of specialty shops.
- The available population within the trade area defined for the proposed development, which at an estimated 18,185 residents at June 2019.

Supermarket

Typically, in Australia a full-line supermarket of at least 3,000 sq.m is provided for every 8,000–10,000 residents. The Appin Road main trade area sector currently includes nearly 18,200 residents and is expected to reach 19,585 by 2026. Such a catchment can support a range of supermarkets and still allow for a significant proportion of the food and grocery expenditure of trade area residents to be directed to supermarket facilities located at higher-order retail centres located beyond the trade area (i.e. Campbelltown-Macarthur).

The key points taken into consideration when assessing the sales potential for the proposed supermarket at the subject site are as follows:

- Supermarkets generate almost all their sales from the take-home food, grocery and packaged liquor (FLG) retail expenditure category. Residents in the main trade area will provide the majority of the sales for the proposed supermarket at the subject site, while the centre will also serve passing traffic. As detailed in Section 2, the available FLG spending generated by the trade area population is estimated at \$117 million at 2022, and is expected to increase to \$140 million by 2031 (in constant dollars terms).
- There is currently only one major supermarket located in the main trade area, being the full-line Woolworths supermarket at Rosemeadow Marketplace.

Food catering

Given the site aspects, the available catchment population and competitive context, it is expected that the proposed centre can sustain the planned restaurant and two takeaway food outlets. A possible mix could be a café, a Thai or Chinese restaurant, a take-away pizza outlet and Subway. A nationally branded restaurant not currently present in the main trade area

would be expected to work well at the site, while the two takeaway food outlets are likely to benefit from a location adjacent to the existing 24-hr service station.

Retail and non-retail specialties

The proposed centre allows for four specialty tenancies totalling 270 sq.m that could accommodate a range of retail and non-retail uses, which would be well placed to serve the convenience needs of the resident population. It is expected that such a development can sustain several retail specialty shops such as fresh food (e.g. bakery, butcher) and retail services (hairdresser, beauty salon), as well as some non-retail facilities (travel agent, real estate agent, etc). For the purposes of the analysis the following mix is assumed:

- Two retail specialties with sales potential of \$8,500 per sq.m for a fresh food outlet and \$6,000 per sq.m for a retail services outlet; and
- Two non-retail specialties.

In addition to the above a gymnasium is included in the concept design and is to be located on the first level of the proposed development. Gymnasiums are typically provided in supermarket based shopping centres with the immediate resident population is likely to associate strongly with the use.

Centre retail sales potential

The following tables provide the estimated sales potential and market shares for the proposed retail component of the development. For the purposes of this analysis, the centre is assumed to be open by mid-2021, with the first full year of trade being FY2022. Sales estimates are presented in constant 2018/19-dollar terms and include GST.

Table 4.1 details the estimated sales potential for the planned retail uses, with total retail sales of \$9.5 million. The sales potential for the supermarket anchor is estimated at \$5 million.

Use	GLA (sq.m)	Est. sales (\$M)	Est. sales (\$/sq.m)
Retail			
- Supermarket	660	5.0	7,500
- Restaurant	210	1.4	6,500
- Take-away food	320	2.2	7,000
- Retail specialty (e.g. fresh food)	70	0.6	8,500
- Retail specialty (e.g. hairdresser)	<u>70</u>	<u>0.4</u>	<u>6,000</u>
Total retail	1,330	9.5	7,180
Non-retail (incl. gymnasium)	<u>370</u>		
Total	1,700		

**Including GST and expressed in constant \$2018/19*
Source: MacroPlan Dimasi

Table 4.2 presents the estimated market shares which the proposed development would be required to achieve in order to deliver the sales potential estimated in Table 4.1. Overall, the market share of available retail expenditure within the main trade area is estimated at 3.1%, comprising an estimated share of 4.2% from the primary sector and 1.7% from the secondary sector. It is expected that around 20% of sales would be generated from beyond the defined main trade area, in the form of passing traffic, given the excellent site location on Appin Road.

Trade area	Est. distribution of sales	Est. sales (\$M)	Total retail exp. (\$M)	Est. market shares (%)
Primary	60.0%	5.7	136.2	4.2%
Secondary	<u>20.0%</u>	<u>1.9</u>	<u>111.7</u>	<u>1.7%</u>
Main TA	80.0%	7.6	247.8	3.1%
Beyond TA	<u>20.0%</u>	<u>1.9</u>	n.a.	n.a.
Total	100.0%	9.5	-	-

**Including GST and expressed in constant \$2018/19*
Source: MacroPlan Dimasi

4.2 Purpose of assessing trading impacts

The purpose of an impact assessment is to provide guidance as to whether or not there is likely to be a net community benefit or disbenefit from any proposed development. In particular, if there is a real possibility of some existing facilities potentially being impacted to such a degree that they may be lost to the community and if the service or services provided by those facilities are not at the very least replaced by the proposed new facilities, then a community disbenefit could result.

In order to understand whether any particular centre may be impacted to the extent that its continued viability may be in question, we have estimated specific retail impacts that we expect across the surrounding competitive network if the proposed development at the subject site were to proceed as planned.

These estimates provide indications as to whether the scale of the proposed retail development is reasonable and whether any surrounding centres are likely to be at risk to the extent that the community would suffer a net disbenefit, attributable to the proposed retail development. In considering likely trading impacts on any individual centre or individual retailer, it must first be acknowledged that such estimation can only realistically expect to provide a broad indication of likely outcomes, since there are many factors which can change in response to any new retail development, and which will have a bearing on the consequent outcomes. The competitive response of each relevant centre or trader is one such factor, as are further redevelopments/improvements which one or more of the competitive network of centres might implement.

4.3 Impact methodology

The following factors are typically considered when assessing the potential impacts of a new retail development on each existing facility or centre:

- The distance of the (impacted) centre, or retail precinct, by road, from the proposed development.

- The size of the centre or precinct, in terms of total retail floorspace.
- The role and function of the centre or precinct.
- Relative accessibility and relative convenience compared with the proposed retail development.
- The estimated performance of the centre/precinct (in current sales) and future performance (in the impact year), accounting for any future developments in the region that may also impact on the future sales of existing centres.
- The share of available expenditure which the centre/precinct attracts from the identified main trade area of the proposed development. A centre may not be situated in the identified trade area of the proposed development but its main trade area may extend to include parts, or all, of the trade area. For example, the trade area for large regional shopping centre typically includes several hundred thousand persons. Such a trade area is likely to include (partially or completely) trade areas for smaller convenience based centres, sub-regional centres, retail strips and stand-alone supermarkets.

Overall a key principle relied on when assessing the dollar (and percentage) impacts that are likely to be absorbed by existing facilities/centres is that the greatest impacts are typically absorbed by the closest comparable centres. For example, a new convenience and food catering based centre is generally likely to impact the closest nearby convenience centres and food catering precincts.

4.4 Assessment of trading impacts

Table 4.3 provides a summary of all the shopping centres in the surrounding catchment, and provides an assessment of the likely order of trading impact on each of the identified centres, showing:

- The current estimated floorspace (GLA) and sales volume for each centre.
- The estimated sales volume for each centre at 2021/22 assuming no development at the subject site.

- The estimated sales volume for each centre at 2021/22 allowing for the proposed development.
- The consequent estimated trading impacts measured both as a sales volume and a percentage impact on each centre.
- The estimated post-impact sales performance at 2021/22 as compared with current (2018/19) sales for each centre.

This analysis represents the cumulative impacts of the potential retail component of the development at the subject site.

Table 4.3 Appin Rd, St Helens Park - estimated impact on specific centres, 2021/22*								
Centre	GLA (sq.m)	Est. sales (2018/19) \$M	Est. Sales (2021/22)		Dist. Of impacts (%)	Est. Impacts (2021/22)		Sale change with dev. %
			Without dev. \$M	With dev. \$M		Est. Impacts \$M	%	
Rosemeadow	7,500	65.0	67.9	64.4	37.5%	3.6	-5.3%	-0.9%
Ambarvale	1,500	18.5	19.3	19.3	0.0%	0.0	0.0%	4.6%
Bradbury	2,500	17.0	17.5	17.5	0.0%	0.0	0.0%	3.0%
Airds**	1,000	5.5	15.0	15.0	0.0%	0.0	0.0%	171.4%
Ruse	1,300	10.0	10.5	10.5	0.0%	0.0	0.0%	4.6%
Campbelltown- Macarthur RC	165,000	1,015.0	1,061.4	1,057.5	40.0%	3.8	-0.4%	4.2%
Appin	<u>1,700</u>	<u>13.0</u>	<u>13.5</u>	<u>13.3</u>	<u>2.5%</u>	<u>0.2</u>	<u>-1.8%</u>	<u>1.8%</u>
Sub-total	180,500	1,144	1,205	1,197	80.0%	7.6	-0.6%	4.7%
Other centres/elsewhere					<u>20.0%</u>	<u>1.9</u>		
Total est. sales proposed development					100.0%	9.5		

*Constant 2018/19 dollars and including GST
 **Assumes Airds Town Centre is redeveloped to include mid-sized supermarkets and new specialities
 Source: Property Council of Australia; MacroPlan Dimasi

The key points to note regarding the estimated impacts across the surrounding network of centres, as presented in Table 4.3, include the following:

- The retail sector is dynamic, and the development of new retail facilities is linked to evident undersupply and/or growth in population. New players, new centres, new competition will

seek to enter any retail hierarchy where there is a market gap and/or future population growth to support such a development.

- It is stressed, however, as already noted previously in this report, that the impact assessment set out above should be regarded purely as a guide as to the likely order of trading impacts on the various existing centres. What is far more important in this instance is the fact that the relevant area is underprovided with retail facilities, and therefore, any resultant trading impacts from the improvement in the provision of such facilities, particularly a modern convenience local centre, is not in reality a negative economic impact as such – rather, it is an addition to net community benefit, for all the reasons set out in this report. There is more than ample available demand for all existing facilities to continue to trade successfully.
- Generally, retail trading impacts less than 10% are mostly considered acceptable, while impacts less than 5% are generally considered minor. However, other factors such as the current trading performance; expansions of centres; potential loss of services to the community; expected growth in the region; and overall net community benefit should be considered.
- Passing motorists would be inclined to use the planned retail facilities due to the prominent location on Appin Road as well as the existing 24-hr service station. Some of these potential customers may substitute shopping trips with other centres/retail offers across a broad area, however, the substitution between centres away from Appin Road (e.g. Rosemeadow, Bradbury, Ambarvale) would be more limited.
- Given the scale and likely composition of the development proposed at the subject site, which will comprise a small supermarket, convenience based retail (including fast food retail) and non-retail commercial uses, the largest impacts are expected to be absorbed by the Campbelltown-Macarthur Regional City, which currently attracts a significant proportion of total expenditure generated by the main trade area population and contains the significant majority of food catering/fast food retail in the region, as well as the closest convenience shopping centre, namely Rosemeadow Marketplace. The estimated impact on Rosemeadow Marketplace is still expected to be relatively modest at 5.3%.

- Impacts on the surrounding smaller centres are all expected to be very minor, as these centres typically only draw a small market share of the available main trade area expenditure and perform a different role and function to the proposed development being considered at the Appin Road subject site.
- The estimated impacts across the identified centres are considered to be within an acceptable range, and would be highly unlikely to result in any reduction in the provision of retail outlets across the region.

Section 5: Employment and other impacts

This section of the report examines the community benefits associated with the proposed development, including employment generation and other economic and social benefits.

5.1 Estimated employment creation

The development of the proposed small supermarket based shopping centre at the subject site will result in additional on-going employment on site, as well as further jobs throughout the supply chain, including those in industries servicing the retail tenants at the site, such as transport workers, wholesalers and the like.

In estimating the various employment benefits, we have relied upon various data sources including information from supermarket operators, the ABS, state and local government agencies, as well as 30 years of experience in preparing assessments of this nature.

Table 5.1 illustrates the estimated increase in direct on-site employment that could potentially be created if the proposed development were to proceed. An estimated 81 jobs could be created on site once the proposed development is fully operational. Making an allowance of around 5% for employment being potentially redirected from other centres, the proposed development could result in a net addition of 77 ongoing direct jobs.

Type of use	Estimated employment per '000 sq.m	GLA (sq.m)	Employment (persons)
Total retail	50	1,330	67
Non-retail	40	370	15
Total		1,700	81
Net increase¹			77

1. Net increase includes an allowance for reduced employment levels at impacted centres, estimated at 5% of the total increase
Source: Mir Group; MacroPlan Dimasi

5.2 Other economic and social impacts

The proposed development at the subject site would generate a range of other economic benefits including the following:

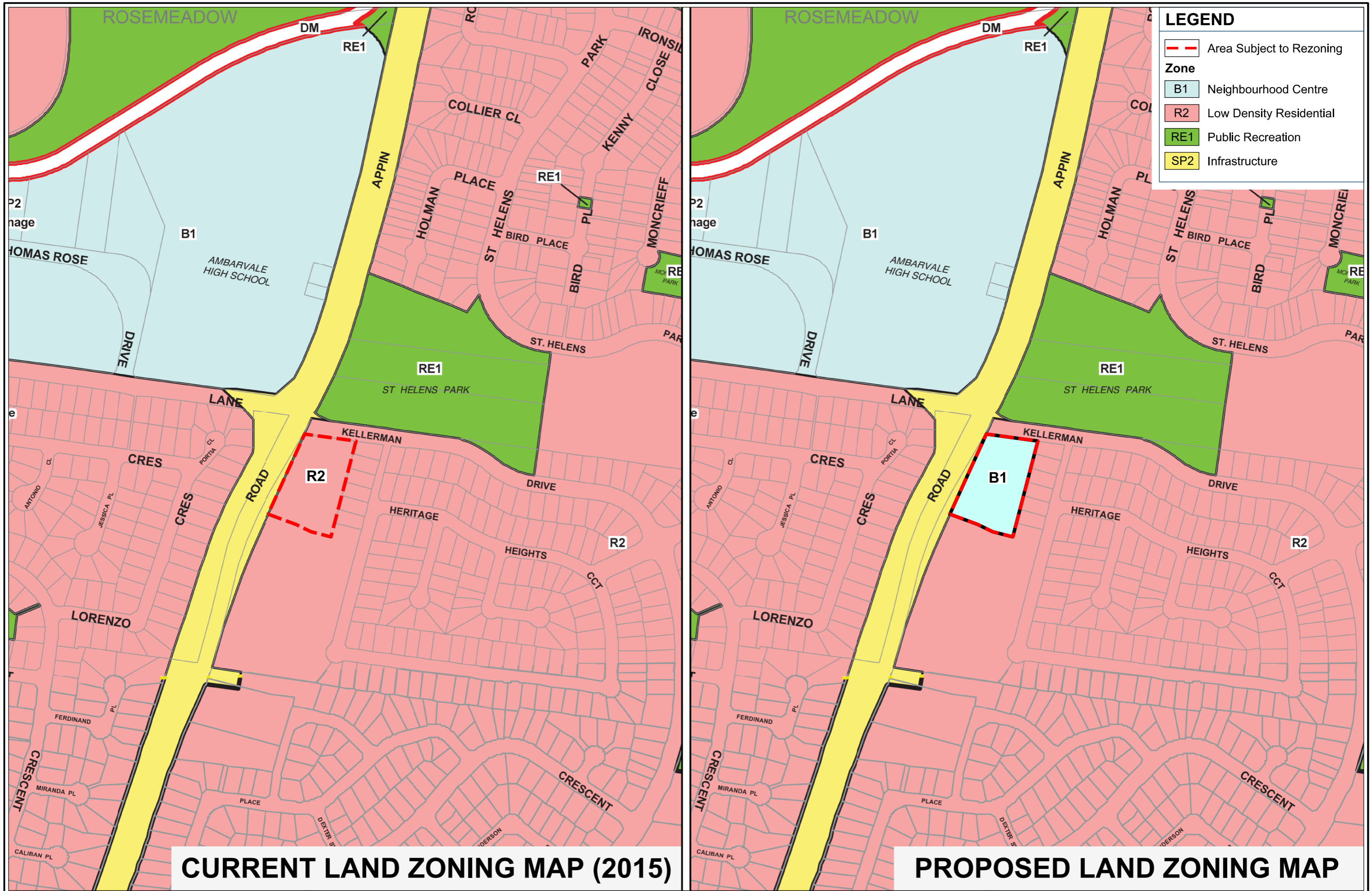
- Increased choice and amenity for the population of the main trade area as well as likely increased competition for the benefit of consumers;
- More convenient access to new convenience retail facilities, to serve both the main trade area population, as well as passing traffic along Appin Road;
- Reduced travel distances, leading to savings on time for main trade area residents, due to a better provision of retail and non-retail facilities at the local level; and
- Providing jobs near people's homes and consequent economic multiplier impacts, which will boost the local economy.

5.3 Summary and net community benefit

The proposed development is to provide a small convenience-based shopping centre anchored by a supermarket. The centre would be well placed to serve surrounding residents as well as passing traffic given its high-profile site on Appin Road. The only shopping centre located in the trade area is Rosemeadow Marketplace, which is anchored by a full range Woolworths supermarket.

The proposed development at St Helens Park is expected to have some minor trading impacts on existing facilities in the region, however, the impacts will not be such as to threaten any existing facility's ability to continue operating successfully. A range of economic and social benefits are likely to arise from the proposed development, therefore, it is concluded that a net community benefit will result from the proposed development.

Appendix 3 Existing & Proposed Land Zoning Map



LEGEND

- Area Subject to Rezoning
- Zone**
- B1 Neighbourhood Centre
- R2 Low Density Residential
- RE1 Public Recreation
- SP2 Infrastructure

CURRENT LAND ZONING MAP (2015)

PROPOSED LAND ZONING MAP

Proposed B1 Zone
ST HELENS PARK

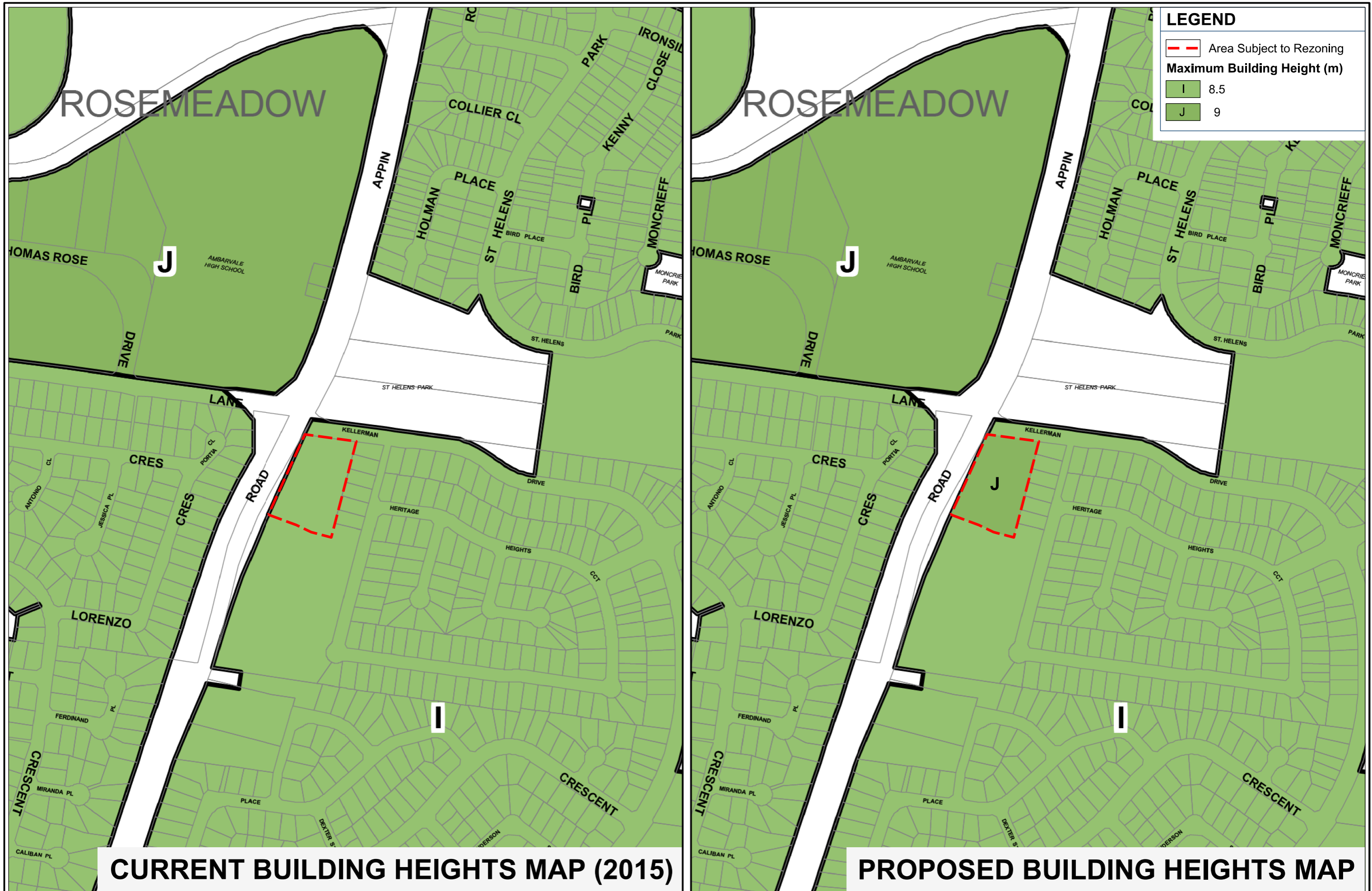
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 Ref: MGCSH-7-001-1 | Date: 22/03/2018 | Revision: C | Scale: 1:4,000@A3
 Note: All areas and dimensions subject to detailed survey

P (02) 9290 3636
 E admin@dp-aus.com.au
 W www.dp-aus.com.au
 PO Box 1778 SYDNEY NSW 2001
 Suite 801 / 171 Clarence Street SYDNEY NSW 2000

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Appendix 4 Existing & Proposed Lot Size Map

Appendix 5 Existing & Proposed Height of Buildings Map



LEGEND

- Area Subject to Rezoning
- Maximum Building Height (m)
 - I 8.5
 - J 9

CURRENT BUILDING HEIGHTS MAP (2015)

PROPOSED BUILDING HEIGHTS MAP

**Building Heights Map
ST HELENS PARK**

NORTH
 20 0 40 80 120 160 200 metres
 Ref: MGCSH-7-004-1 | Date: 29/05/2019 | Revision: D | Scale: 1:4,000@A3

(02) 9296 9636
 admin@designandplanning.com.au
 www.designandplanning.com.au
**design+
PLANNING**
 PO Box 1778 SYDNEY NSW 2001
 Suite 401 / 171 Clarence Street SYDNEY NSW 2000

Note: All areas and dimensions subject to detailed survey

**Appendix 6 Existing & Proposed Lot Size for Dual
Occupancy Map**



LEGEND

— Area Subject to Rezoning

Minimum Lot Size (sq.m)

Q 700

CURRENT LOT SIZE FOR DUAL OCCUPANCY DEVELOPMENT MAP (2015)

PROPOSED LOT SIZE FOR DUAL OCCUPANCY DEVELOPMENT MAP

Proposed Lot Size For Dual Occupancy Development Map
ST HELENS PARK

NORTH

20 0 40 80 120 160 200 metres

Ref: MGC5H-7-003-1 Date: 22/03/2018 Revision: B Scale: 1:4,000@A3

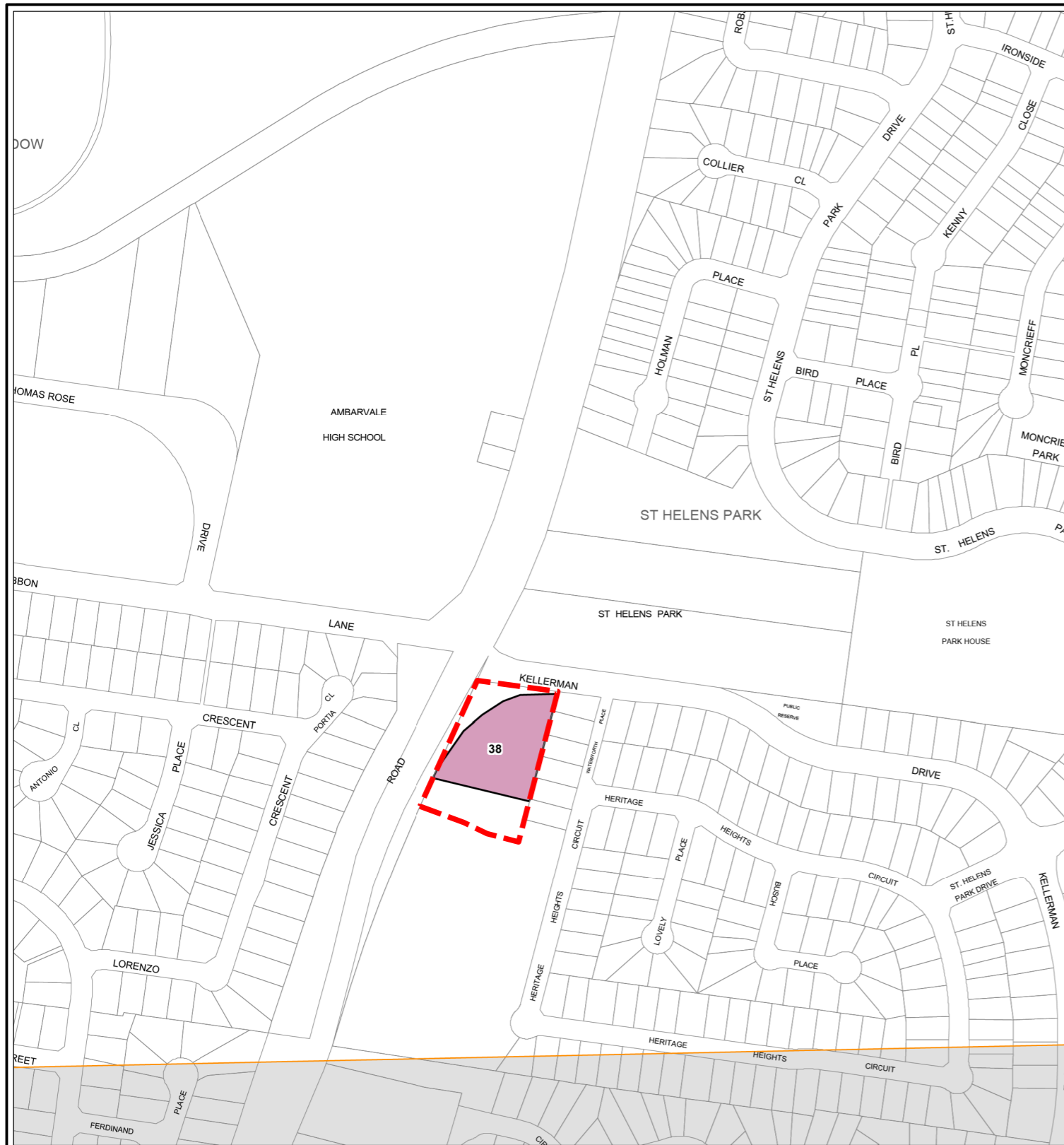
Note: All areas and dimensions subject to detailed survey

P (02) 9290 3636
 E admin@dp-aus.com.au
 W www.dp-aus.com.au

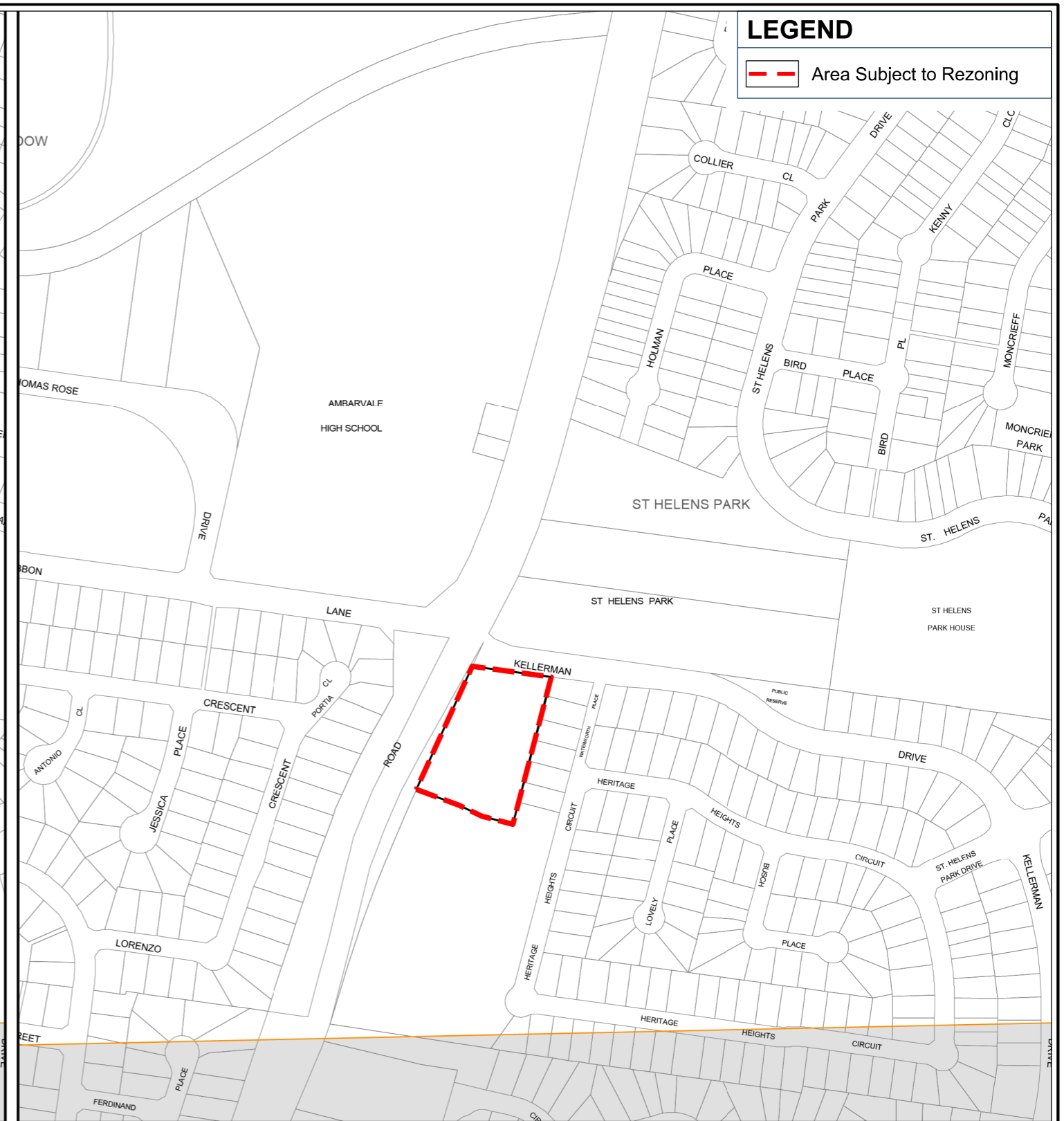
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**Appendix 7 Existing & Proposed Additional Permitted
Uses Map**



CURRENT ADDITIONAL PERMITTED USES MAP (2015)



PROPOSED ADDITIONAL PERMITTED USES MAP

LEGEND

Area Subject to Rezoning

Additional Permitted Uses Map
ST HELENS PARK

20 0 40 80 120 160 200 metres
 Ref: MGCSH-7-005-1 | Date: 4/06/2018 | Revision: B | Scale: 1:4,000@A3
 Note: All areas and dimensions subject to detailed survey

P (02) 9290 3636
 E admin@dp-aus.com.au
 W www.dp-aus.com.au
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PLANNING
 PO Box 1778 SYDNEY NSW 2001
 Suite 801 / 171 Clarence Street SYDNEY NSW 2000