

14 September 2015

Director Urban Renewal  
NSW Department of Planning and Environment  
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Via email:

**Submission to Glenfield to Macarthur Strategy  
6-12 Dumaresq Street Campbelltown**

This submission is made on behalf of Perception Investire P/L, who currently have an option over all lots in Strata Plan 63212, 6-12 Dumaresq Street Campbelltown (the site). The site is approximately 1,280m<sup>2</sup>.

The Glenfield to Macarthur Strategy has indicated that the site will be located within the commercial and retail core of Campbelltown. This is consistent with the Draft Campbelltown LEP 2014.

Draft Campbelltown LEP 2014 zoned the site:

- B3 Commercial Core
- 45m Maximum Building height (14 storeys)
- 6:1 Maximum FSR

The following should be incorporated within the strategy for the Commercial and Retail Core of Campbelltown.

**Maximum building height – 70m**

**Maximum FSR – 10:1**

**Shop-top housing to be permissible with consent within Commercial Core area.**

Background

Perception Investire P/L and ae design partnership met with Campbelltown Council in September 2013 to discuss a development proposal greater than 10 storeys. It was discussed at the meeting that an urban design block study would need to be undertaken to justify development exceeding 10 storeys, the Campbelltown DCP maximum. The street block has three sites, Council owned Cinema Site, Strata Plan 63212 and the Australia Post site. The block is defined by Coogan Place, Coogan Place Carpark, Hurley Street and Dumaresq Street.

Preliminary studies undertaken by ae design partnership show that towers can be accommodated on all 3 sites, subject to adequate building separation, which is achievable through careful design that considers both tower width and location on each site.

Rationale and justification for increased maximum building height and floor space ratio

**Council's submission to the Draft Metropolitan Strategy for Sydney 2031**

Campbelltown Council prepared a submission to the Department of Planning in May 2013, which emphasised the potential of Campbelltown CBD to become a sub-regional centre which incorporates high density mixed use development around Campbelltown Station.

Increasing the density of sites within the city centre is consistent with Campbelltown being the most important centre within the Glenfield to Macarthur Corridor, a key urban activation corridor identified by Department of Planning. This corridor will provide employment and housing opportunities within walking distance of Rail Stations.

The draft strategy restricts future development potential within the Campbelltown CBD.

### **Transit Orientated Development**

The subject site is located within a 10 minute walking catchment of Campbelltown Station which is identified as *"the largest train station in the corridor"* in the Campbelltown Precinct Land Use and Infrastructure Analysis 2015 (p. 5). Construction of high density retail, commercial and residential within walking distance of Campbelltown Station will encourage public transport patronage and reduce the number of vehicular trips made.

### **Section I 17 Direction 3.4 Integrating Land Use and Transport:**

Council are required to consider this direction whilst preparing the Draft LEP. The reduction in development potential for this site is inconsistent with this directive for the following reasons

- Site is located within 500 metres/ a 10 minute walking catchment of Campbelltown Station.
- Due to its proximity to the Campbelltown Station, the development permitted by the proposed amendments will achieve the following objectives of this ministerial Direction:
  - (a) *Improving access to housing, jobs and services, cycling and public transport.*
    - Development will be able to provide a greater number of residential apartments within walking distance of Campbelltown Station.
  - (b) *Increasing the choice of available transport and reducing dependence on cars.*
    - The development would reduce the dependence of residents on cars
  - (c) *Reducing travel demand including the number of trips generated by development and the distances travelled, especially by car:*
    - Number of trips generated from development will be reduced as residents can be served by retail component of the development.
    - Number of trips to the development by car will be reduced as site is located within walking distance of Campbelltown Station.
  - (d) *Supporting the efficient and viable operation of public transport services*
    - The amendments will allow a development that increases the concentration of residents within walking distance of strong public transport links.

### **Development cost of high-rise development**

The Building Code of Australia (BCA) fire requirements for buildings above an effective height of 25m significantly impact development costs, making developments at 10 storeys cost prohibitive. These increased costs of construction can be mitigated in two ways:

- 1) Developing to an effective height of 25m (maximum 7/8 storeys).

This would substantially reduce the desired building height and residential floor area for the site as anticipated within the Draft LEP, which is to achieve the desired outcomes of the Local Planning Strategy and Residential Development Strategy.

- 2) Reduction of proportionate cost through distribution of costs across more units.

Greater height and FSR is required to facilitate a financially feasible development. Perception Investire P/L have advised that more flexible controls are required to accommodate 20 storeys in order to allow development of the site to be financially feasible.

### Building Height provisions are lower than other major centres

A comparison of maximum building heights in the CBD of other major centres (Table 1) shows that other CBD's have substantially greater building heights than those proposed in Campbelltown. This limitation on building height restricts the scale of high rise that may occur, and potentially the feasibility of high rise development. As construction costs are similar across the Sydney metropolitan region, this may also mean that there is more incentive for development in other centres where there is a greater height and FSR, hence limiting investment in Campbelltown.

Table 1 – Comparison of maximum building heights in selected major centres

	Maximum building height zone in CBD
Parramatta (City Centre LEP 2007)	200m
Liverpool (LEP 2008)	100m
Penrith (City Centre LEP 2008)	80m
Campbelltown (draft LEP 2014)	45m

### Consistency with A Plan for Growing Sydney 2014

- Campbelltown-Macarthur has been identified as a strategic centre in A Plan for Growing Sydney.
- Action 1.7.4 of the plan is to:  
*Continue to grow Penrith, Liverpool and Campbelltown-Macarthur as regional city centres supporting their surrounding communities* (A Plan for Growing Sydney 2014, p. 49).
- As seen in Table 1, both Liverpool and Penrith have significantly greater height limits than Campbelltown. For Campbelltown to be able to grow into a competitive regional city centre, greater permissible height limits are required.
- The priorities for Campbelltown-Macarthur as a Strategic Centre include:  
*“Work with council to provide capacity for additional mixed-use development in Campbelltown-Macarthur including offices, retail services and housing.* (A Plan for Growing Sydney 2014, p. 130)
- Increasing maximum building height from 45 metres to 70 metres and maximum FSR from 6:1 to 10:1 will enable the greater provision of retail, commercial and residential floorspace within the development to serve the surrounding communities.

### Consistency with Campbelltown Local Planning and Residential Development Strategies

The Campbelltown Residential Development Strategy (May 2014) exhibited with the dLEP states that:

- The site is in a potential development area for high density residential/mixed use.
- That the mix of infill to greenfield as anticipated by the draft South West Regional strategy was 80:20.
- That there is a “significant shortfall in respect of annual average” (RDS p.13) dwelling target of “454 dwelling approvals per year” (RDS p.13).

The requested increase in FSR and building height is in accordance with the Residential Development Strategy and assists in providing additional floor space to address the needs of future population (RDS p.4) and the need for high rise housing within the city to minimise housing stress (RDS p.5).

The Campbelltown Local Planning Strategy (May 2014) outlines the desire for residential growth to occur in Campbelltown-Macarthur Centre in the short term (LPS p. 74). Height and FSR limitations need to be sufficient to encourage development in the short term.

By increasing the maximum building height and FSR for the subject site, development may occur in the short term, assisting in achieving the objective of the LPS to minimise the urban footprint of Campbelltown City through allowance of additional residential development in the form of shop top housing within the city centre.

This will add additional day and night activity to the centre, encouraging shorter journeys to work and public transport use.

### Consistency with the aims and objectives of draft CLEP 2014

The requested increase to height and FSR is consistent with the aims and objectives of draft LEP 2014 including:

- B3 Commercial Core Zone objectives.
- Clause 4.3 Height of buildings.
- Clause 4.4 Floor space ratio.

### Conclusion

It is requested that the Maximum building height is increased to 70m (22 Storeys) and a corresponding Maximum FSR of 10:1 is applied to 6-12 Dumaresq Street, Campbelltown.

The requested amendments are justified for the following reasons:

- Costs of high-rise development increase above an effective building height of 25m; additional costs need to be distributed across more units to be feasible.
- Building height provisions (proposed and requested) are lower than other comparable major centres.
- The requested amendments are consistent with:
  - Campbelltown Local Planning Strategy.
  - Campbelltown Residential Development Strategy.
  - The aims and objectives of land use zone, height of buildings and floor space ratio clauses.

Should you wish to discuss this submission further please contact me on (02) 95194994 or email [rohan@aedesignstudio.com.au](mailto:rohan@aedesignstudio.com.au).

Sincerely,  
ae design partnership Pty Ltd



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