

Our Ref: M200169

4 September 2020

The General Manager  
Canterbury Bankstown Council  
PO Box 8  
**BANKSTOWN NSW 1885**

*Delivered by email to: haveyoursay@cbc.city.nsw.gov.au*

Dear Sir/Madam,

**SUBMISSION IN RELATION TO EARLY LANDOWNER  
ENGAGEMENT PACKAGE FOR THE CAMPSIE MASTERPLAN  
Nos. 503-505 CANTERBURY ROAD, CAMPSIE**

We act as town planning consultants to the owner of Nos. 503-505 Canterbury Road, Campsie and refer to the Landowner Early Engagement Package for the *Campsie Town Centre Master Plan* (CTCMP).

This submission outlines the features of the site and its context with regards to the potential development standards that can be applied to the site in accordance with the CTCMP, Local Strategic Planning Statement (LSPS) 'Connective City 2036' and the *Canterbury Road Review* (CRR). This submission demonstrates the suitability of the subject site to accommodate a mixed use redevelopment given its critical location within the Canterbury Road Enterprise Corridor, specifically, at the major intersection between Canterbury Road, Beamish Street and Bexley Road. As identified per the previous submission made for the subject site pertaining to the Canterbury-Bankstown Consolidated Local Environmental Plan (CBCLEP), the site is capable of accommodating a higher density and more intensive use.

This letter provides a response to the Early Engagement Package provided to landowners of sites affected by the CTCMP. As identified within the LSPS, the subject site is identified with the *Campsie Strategic Centre*, specifically the *Canterbury Road – Campsie Village Centre*. As required by the Early Engagement Package, this Submission appropriately responds to '8 Planning Priorities' of the CTCMP to demonstrate that the site is capable of increased density and intensity. In correlation with suitable density increases, this submission outlines the opportunities to provide creative planning strategies as requested by Council.

**1. Subject site and surrounds**

The subject site to which this submission relates is Nos. 503-505 Canterbury Road, Campsie and is shown outlined red in the aerial photograph in **Figure 1**. The site is legally described as Lot 2 in DP 4178. The site has a total area of approximately 1,130m<sup>2</sup> with a front boundary of approximately 19m which widens to the rear at 36m. The site has a street frontage to Canterbury Road and is within close proximity to the major intersection between Canterbury Road, Beamish Street and Bexley Road.

The site is currently occupied by a two storey residential flat building with a singular vehicular crossing to Canterbury Road. The front of the site is occupied by a hardstand parking area with private open space provided at the rear. A photograph of the site is provide at **Figure 2**.



PLANNING INGENUITY

Suite 210, 531-533 Kingsway  
Miranda NSW 2228  
P 02 9531 2555

Suite 6, 65-67 Burelli St  
Wollongong NSW 2500  
P 02 4254 5319





**Figure 1:** Aerial Photo of No. 503-505 Canterbury Road, Campsie (Source: SixMaps)

The site has distinct advantages given its highly accessible location and relatively large site area and frontage. Given the location on Canterbury Road, the site is capable of increased mixed-use density that is beyond the development standards contained within the current CLEP 2012 and CBCLEP.



**Figure 2:** Canterbury Road frontage of the subject site (Source: Google Maps)

Directly to the east of the subject site is No. 501 Canterbury Road, which contains a hardstand parking area serving vehicles to utilising Nos. 499 Canterbury Road and 416-418 Beamish Street, which currently contain single storey commercial buildings (**Figure 3**). Immediately adjoining the site to the west, is No. 507 Canterbury Road, which contains a two storey residential dwelling house (**Figure 4**).



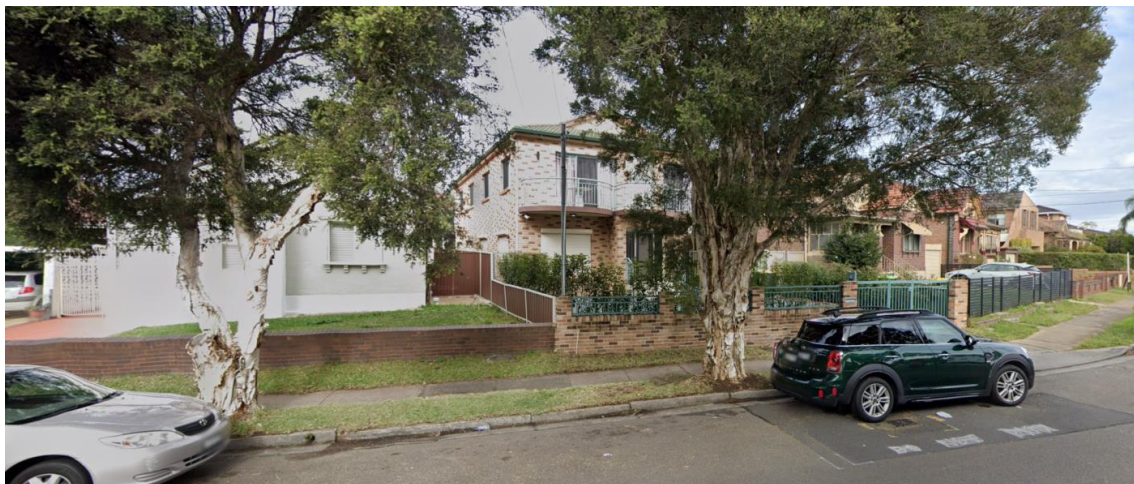


**Figure 3:** No. 501 Canterbury Road – Hardstand Parking Area  
(Source: Google Maps)



**Figure 4:** No. 507 Canterbury Road (Source: Google Maps)

To the north (and rear) of the site, accessed from Fletcher Street are a number of low density single residential dwellings (**Figure 5**). To the south of the site and on the opposite side of Canterbury Road is No. 436 Canterbury Road, which contains a three storey walk-up residential flat building (**Figure 6**).



**Figure 5:** Residential dwellings to rear of subject site along Fletcher Street (Source: Google Maps)



**Figure 6:** No. 436 Canterbury Road opposite subject site (Source: Google Maps)

## 2. Future Density and Development

As identified in the LSPS, the subject site is located within the Campsie Strategic Centre which envisages an appropriate increase in density. The site is also situated in a highly accessible area along Canterbury Road, which encourages an increase of density aligning with that foreshadowed in the CRR. As per the CBCLEP, the site is zoned as R3 Medium Density Residential with an 8.5m maximum building height and 0.5:1 Floor Space Ratio (FSR). The current controls do not encourage redevelopment which is proportionate to the sites superior location. Accordingly, increase of density reflective of the LSPS and CRR is considered to be appropriate.

The LSPS identifies that the subject site, immediately surrounding locality and Campsie Town Centre is to form the '*Eastern Lifestyle and Medical Precinct*'. Specifically, the sites close proximity to Canterbury Hospital envisages that the subject site is to form part of a medical mixed-use precinct and 'urban boulevard'. The LSPS seeks to increase the amount of residential accommodation, employment opportunities and public transport patronage. Given these objectives, the subject site and immediate locality along Canterbury Road provides a viable opportunity for an increase in development density.

The subject site is considered to provide superior positioning to involve rezoning to B2 Local Centre, B4 Mixed Use or less likely, R4 High Density Residential. As identified by the CRR and LSPS, the sites prime location within the intersection of Canterbury Road, Beamish Street and Bexley Road encourages the provision of mixed use development with increased residential density. Specifically, the LSPS, envisages Canterbury Road to focus on mixed uses, including medical related businesses, retail and commercial premises through the creation of an 'urban boulevard'. It is important to note that the provision of residential accommodation on upper levels, as opposed to strictly commercial development, ensures the continued activation and natural surveillance of the streetscape to promote longevity of Canterbury Road Corridor. Further, this will directly respond to the desired increase of residential accommodation, employment opportunities and public transport patronage envisaged by the LSPS.

Given the above, an increase of building height ranging from 6 to 9 storeys (18m to 27m) can be reasonably anticipated to provide a proportionate increase of commercial uses which can ultimately be accompanied by additional residential accommodation. Concurrently, an increase in FSR of approximately 3:1 or 4:1 would be commensurate with increased building height within the typical building footprints of development located on B2 or B4 zoned land. The proposed zoning commonly incorporates nil setbacks to front and side boundaries to maximise increased commercial floor area (on ground, and potentially first floor) with residential accommodation above as is encouraged the LSPS. The increased floor height and flexibility of FSR promotes mixed use development which provide streetscape activation at lower levels and high levels of amenity for upper level residential accommodation. Council can seek to specifically control FSR for commercial and residential portions of development to ensure employment and residential opportunities align.

In addition to the above, the CRR specifically identified that the subject site was contained within a key '*junction*' of the Canterbury Road Corridor. The CRR stipulated that the subject site and surrounds (being contained within the key '*junctions*') are to be rezoned to B2 Local Centre (or the like) to provide for medium to high density housing as part of mixed use developments. The CRR was prepared in accordance with the *Urban Design Study* prepared by Hill Thalys. The *Urban Design Study* established that the subject site and surrounding localities can accommodate a combination of 2 to 6 six storey development with an increase in FSR. Given the age of the CRR (2017) when compared to the LSPS (2019), it is anticipated that Council will revisit the increase of density stipulated by the CRR to ensure the objectives of the LSPS are achieved.

Importantly, it is noted that there is a proposed through-road from Canterbury Road to Fletcher Street within proximity to the subject site. Compulsory acquisition of part or all of the subject site to accommodate this widening is considered to result in the loss of a significant development opportunity in a strategic position. When compared to a number of

neighbouring properties, the subject site is a significant portion of land with a substantial site area and can be successfully developed without amalgamation. Loss of part or all of the site land to accommodate an additional roadway is considered to directly impact the short to medium term improvement of the Canterbury Road Corridor. Acquisition of land should be considered to smaller lots which will require amalgamation to avoid significant short term improvements to the streetscape and character of the locality.

Further, it is noted the provision of a two-way through road impacting the subject site is not considered to align with the envisaged improvement to public transport patronage and desired 'urban boulevard' streetscape character. As such, it is suggested that this additional roadway be appropriately offset from the major intersection between Canterbury Road, Bexley Road and Beamish Street. The provision of a one-way street or pedestrian boulevard may be more appropriate given the abovementioned desire to improve public and active (walking and cycling) patronage. Accordingly, given the site area and its prime location, compulsory acquisition to part or whole of the land is considered to be antipathetic to the LSPS and CRR in that it will result in a direct impact to the short and medium long term objectives envisaged in these documents.

### 3. Planning Priorities of the CTCMP

The Early Landowner Engagement provides 8 *Planning Priorities* which are required to be considered in the preparation of any submission. The responses below provide justifications and opportunities for the abovementioned increase in density and rezoning in accordance with the LSPS and CRR.

8 Planning Priorities	
Planning Priority	Response
<i>Priority 1: Prioritise better public transport usage and increased space for pedestrians</i>	<p>The subject site is located within a highly accessible location which aligns with the envisaged improvement of public transport along Canterbury Road per the LSPS and CRR. The provision of additional bus services, concentration on the 'urban boulevard' and relatively close proximity of the site to Campsie Railway Station will adequately support the changing land density of the locality. The sites close proximity to Canterbury Hospital and prime location also provides an opportunity encourage 'shared trips', whereby individuals can utilise public transport to visit numerous retail, commercial and medical premises.</p> <p>Further, the increased provision of employment opportunities in accordance with residential accommodation can provide an improved focus on physical transport, such as walking and cycling. Dedicated cycling paths which form part of the pedestrian pathway or roadway can provide an alternative way for members of the community move throughout the locality. As is common within modern developments, provision of bicycle parking and end of trip facilities for commercial properties and residential accommodation can encourage the use of active transport for commuting purposes.</p>
<i>Priority 2: Deliver local jobs, a strong local economy and a diverse skilled workforce</i>	<p>The subject site and surrounding properties are strategically located along a highly accessible corridor and within close proximity to the Canterbury Hospital. As envisaged by the LSPS, the subject site and locality can provide an increase of density which affords improved medical and commercial tenancies within close proximity to residential accommodation. The provision of a mixed use zone or the like can ensure the ground floor of each property with a frontage to Canterbury Road be dedicated to a non-residential use. Further, the first floor of properties can be required to provide a floor to ceiling height which will allow flexibility for change of use in future applications.</p>





## 8 Planning Priorities

The provision of residential accommodation above commercial premises will provide local jobs within close proximity to residential land uses. Furthermore and as identified per the LSPS, the subject site is located within an area which is identified as an 'urban boulevard' and 'medical destination'. The proposed mixed-use will resultant provide a direct relationship between residential accommodation and local jobs.

In accordance with the above, it is noted that there is a vast disparity in the planning provisions contained within the Consolidated LEP between the subject site and neighbouring properties to the east, being Nos. 499-501 Canterbury Road and 406-418 Beamish Street. These neighbouring properties are permitted to be redeveloped at a significantly greater scale than the subject site, including B2 Local Centre zoning, a building height of 18m and uncapped maximum FSR. This resultantly can provide a built form of 6 to 8 storeys with and significantly greater density. Accordingly, appropriate up-zoning and increased density of the site to reflect the LSPS and CRR should be allowed to improve residential and employment opportunities.

*Priority 3: Promote a healthy and living river system that flows through the Cooks River catchment*

The subsequent up-zoning and increase of density of the site and surrounding locality is not considered to be antipathetic to this priority.

*Priority 4: Create an integrated network of ecological and green spaces*

The site is situated within a dense urban landscape which does not afford significant opportunities for expansive open spaces and dense ecological and green space. However, as is common throughout areas of increased density, the provision of vertical gardens and landscaped roof top open spaces can provide a viable alternative to the provision of traditional deep soil areas and landscaped zoning. The anticipated B2 or B4 zoning on the site with active street frontages is often coupled with nil front and side setbacks to maximise activity and commercial viability. Given the anticipated density of the site and Canterbury Road in accordance with the LSPS (which seeks to intensify medical and commercial services in the locality) the utilisation of vertical gardens and roof top terraces can provide the benefits of a landscaped character and ecological network of the locality.



Roof Top Garden (Source: Google Images)



Central Park Sydney (Source: Google Images)





## 8 Planning Priorities

*Priority 5: Provide diverse, accessible, and affordable housing*

The provision of mixed use development along Canterbury Road will include the provision of an increased number and variety of residential accommodation within a highly accessible location. Given the anticipated improvement of public transport along this vital corridor as envisaged by the LSPS and CRR, the provision of additional residential accommodation within close proximity to places of employment is suitable to increased affordable rental housing.

Mixed use development can seek to utilise the benefits provided under the Affordable Rental Housing SEPP, which encourages the development of affordable rental housing in areas with high levels of accessibility. The provision of affordable housing within close proximity to various employment opportunities will ensure activation of Canterbury Road for the long term.

*Priority 6: Create cultural places and spaces will service and celebrate many cultures, languages, activities, and age groups*

Although this priority does not pertain strictly to the subject site, particularly given the LSPS envisages a commercial and medical character for the precinct and immediate locality, the increased residential density (which is inclusive of affordable housing) can provide a direct benefit to the wider cultural vision of Campsie through permitting accessibility for all community members. Specifically, the LSPS seeks to strength the character of Campsie as an 'Eastern Lifestyle Precinct' which can be bolstered through the additional residential, employment and public transport opportunities offered along the Canterbury Road Corridor.

*Priority 7: Deliver quality design in public and private areas:*

The redevelopment of the subject site and neighbouring properties along Canterbury Road will deliver the envisaged 'urban boulevard' and therefore significantly improve the public domain of the locality. Although the site does not provide any public open spaces, the provision of private open spaces for residential apartments and communal roof top spaces can provide casual surveillance and activation of the streetscape. As detailed in the LSPS, Canterbury Road is well positioned and offers extensive views of Greater Sydney. The provision of roof top communal areas, as is common within modern developments, will deliver high quality private areas.



*Sydney Roof Top Space (Source: Sydney Morning Herald) urb*





## 8 Planning Priorities

Priority 8: Deliver sustainable buildings and spaces

The site has the capability to deliver sustainable buildings through the incorporation of appropriate design measures and relevant certifications, including BASIX and NatHERS. Increased building height and flexible FSR can accommodate residential apartments with high levels of amenity. Appropriate measures can be put in place, including the utilisation of winter-gardens, to ensure future residential occupants will achieve acceptable levels of acoustic privacy and air quality.



Wintergarden (Source: Google Images )

## 4. Conclusion

As identified within this submission, the subject site and immediate locality is strategically located and can successfully accommodate rezoning and increased density to establish a built form, streetscape character and activation of the precinct to respond to the *8 Planning Priorities* and ensure short and long term growth of the Campsie Town Centre

Furthermore, it is considered that the transformation of Canterbury Road should be given significant weight with regards to the timely delivery of revised planning provisions and subsequent development opportunities, given the economic recession brought about by the COVID-19 pandemic.

We would appreciate the opportunity to discuss this submission further with Council staff at a time that's convenient to all. In this regard, please contact the undersigned at your earliest convenience.

Yours faithfully,  
Planning Ingenuity Pty Ltd

Jeff Mead  
**MANAGING DIRECTOR**

