



# Anoulack Chanthivong MP

MEMBER FOR MACQUARIE FIELDS

The General Manager  
Campbelltown City Council  
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7 September 2020

## Submission re Campbelltown Local Housing Strategy

Dear Lindy,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Communities, and Councils, do not need to simply sit back and accept the overdevelopment agenda of the NSW Liberal Government. In fact, just recently opposition to NSW Government planning controls resulted in development plans in North Sydney being scaled back due to community concerns<sup>1</sup>.

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

Yours sincerely,



**Anoulack Chanthivong MP**  
**Member for Macquarie Fields**

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<sup>1</sup> <https://www.smh.com.au/national/nsw/development-plans-for-sydney-s-north-shore-scaled-back-after-outcry-20200828-p55q9w.html>