

**Submission
No 134**

INQUIRY INTO DEVELOPMENT OF THE TRANSPORT ORIENTED DEVELOPMENT PROGRAM

Organisation: Campbelltown City Council

Date Received: 28 March 2024

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The Hon. Sue Higginson MLC
Chairperson
Portfolio Committee No. 7:
Planning and Environment
Via portal

Dear Chairperson,

Campbelltown City Council submission: Inquiry into the development of the Transport Oriented Development Program

Campbelltown supports the principle of growing housing density within a convenient walking distance from transport hubs and town centres. The vision of our City Centre aligns with the concept of Transit Oriented Development: to create compact, walkable, mixed-use communities, with high-quality transport as their central focus.

Campbelltown Local Government Area is well-placed to accommodate high-quality density along its railway corridor, sustainably and affordably.

Council has already developed a comprehensive framework for the densification of our City Centre, including the Reimagining Campbelltown City Centre Master Plan and a draft City Centre Design Framework. We have identified a significant level of latent development capacity in our City Centre, and to help enable uplift we are currently preparing supporting studies for a Planning Proposal to amend the Campbelltown Local Environmental Plan. Our planning framework and policies are positively responding to the crises our communities are currently facing.

Further, across our Local Government Area, planning work has been undertaken since the release of the Glenfield to Macarthur Urban Renewal Corridor Strategy by the NSW Government in mid-2015. Rezoning has occurred in key centres such as Ingleburn and Glenfield that is largely consistent with this strategy.

The Mayor of Campbelltown has written to the Premier of NSW on 9 November 2023 inviting the NSW Government to undertake a state-led rezoning in Campbelltown City Centre. In this invitation, the Mayor expressed that the Campbelltown area is an opportunity that the government should not turn away from, but instead take full advantage of, in its attempt to deliver planning schemes and development outcomes that enable delivery rates to meet the ever-increasing housing demand. Since the letter to the Premier on 9 November 2023, Council has progressed the development of the Planning Proposal and supporting studies for the Campbelltown City Centre area and has committed significant funding for this project.

Despite the offer above and Campbelltown's strategic positioning, the Transit Oriented Development Program does not mention Campbelltown LGA. Campbelltown LGA's suburbs and station precincts are not included within the 8 priority transport hubs, nor the 31 other well-located transport hubs and town centres.

We have written numerous letters to NSW Ministers on the issue and published this correspondence in our publicly available business papers, including:

- Letter to the Hon Chris Minns MP, Premier of NSW dated 9 November 2023, published in Council's 12 December 2023 business papers at Item 7.1.
- Letter to the Hon Paul Scully MP, Minister for Planning and Public Spaces dated 28 November 2023, published in Council's 12 December 2023 business papers at Item 7.2.
- Letter to the Hon Paul Scully MP, Minister for Planning and Public Spaces dated 6 February 2024, published in Council's 13 February 2024 business papers at Item 7.9.

A copy of each of the above letters is attached for convenience.

Campbelltown City Council is grateful for the opportunity to respond to the key areas of the Terms of Reference of the Legislative Council's Inquiry.

(a) the analysis, identification or selection undertaken by the Government, the Premier's Department, The Cabinet Office or the Department of Planning, Housing and Infrastructure (Department) into:

- (i) the eight Transport Oriented Development Program accelerated precincts**
- (ii) the 31 Transport Oriented Development Program precincts where the Transport Oriented Development Program State Environmental Planning Policy (SEPP) applies**
- (iii) any of the 305 Sydney Trains, Sydney Metro and Intercity stations within the Six Cities Region which were considered as part of any of the Transport Oriented Development Program locations.**

We do not have any visibility over the methodology for selecting precincts but seek to understand the reasoning behind precincts that have or have not been identified.

In the materials published by NSW Government in December 2023, the Department purports to have undertaken analysis of 305 Sydney Train, Sydney Metro, and Intercity stations within the Six Cities Region to identify locations that have enabling infrastructure capacity near the transport station to support additional housing growth.

We would like to understand why Campbelltown City Centre, and a number of precincts around a number of railway stations in Campbelltown Local Government Area were discounted as viable options for government consideration to extend this program, noting that Campbelltown Council is making a significant investment in leading a Planning Proposal for the City Centre to enable high quality, walkable, mixed-use communities.

(b) the probity measures put in place by the Government, the Premier's Department, The Cabinet Office and the Department

Council is not best placed to comment on this item.

(c) the development of the Transport Oriented Development Program policy approach by the Government

We support the delivery of higher density housing around transport hubs and have identified a number of opportunities that could accommodate an uplift in dwelling numbers around transport facilities within the Campbelltown Local Government Area, that could increase our diversity of dwelling typology.

Beyond the 305 Sydney Trains, Sydney Metro and Intercity stations forming part of the program, allocating transit-oriented development around other modes including Light Rail and Bus Rapid Transit (such as the B-Line) should be considered. This would help unlock housing across parts of Greater Sydney that have efficient transport infrastructure and significant amenity but have not been expected to support a commensurate level of density.

The TOD Program's scope of 39 transport hubs has a focus on "land within 1,200 metres of 8 rail and metro stations" and "within 400 metres of 31 stations". Place-based planning should be used in place of this simplistic desktop approach with 'as the crow flies' boundaries. A 400-metre or 1,200-metre buffer cannot accurately measure or represent walkability to station hubs, especially in centres severed by major road, infrastructure, and water corridors. The Program should focus on time-based catchments defined by accurate 5, 10 and 15-minute walking distances.

(d) consultations undertaken with councils, joint regional organisations and communities during the preparation of the Transport Oriented Development Program State Environmental Planning Policy

Campbelltown City Council was not formally consulted during the preparation of the Transport Oriented Development Program State Environmental Planning Policy.

(e) ongoing opportunities for review and input by councils, joint regional organisations and communities, including consultations with renters, key workers and young people needing affordable housing in relation to the Transport Oriented Development Program State Environmental Planning Policy

We would appreciate any opportunity for engagement to contribute to government policy on Transport Oriented Development. We have written numerous letters to NSW Ministers on the issue and published this correspondence in our publicly available business papers as detailed above.

Campbelltown City Council is also a member of The Parks, Sydney's Parkland Councils' alliance, and would be pleased to contribute with any engagement through this forum also.

(f) information control protocols relating to the Transport Oriented Development Program policy

Council is not best placed to comment on this item.

(g) property disclosure requirements and management

Council is not best placed to comment on this item.

(h) the release of information prior to the official publication of the Transport Oriented Development Program policy

Council is not best placed to comment on this item.

(i) the heritage concerns with the Transport Oriented Development Program including but not limited to the concerns of the Heritage Council

Council is not best placed to comment on this item.

(j) the enabling infrastructure capacity for every station selected or considered as part of the Transport Oriented Development Program

Campbelltown's station precincts provide this opportunity, noting two of these stations (Campbelltown-Macarthur and Glenfield) are also identified for future Metro connections to Western Sydney International Airport and Rapid Bus connections.

Campbelltown City Centre, as the Metropolitan Centre for the Macarthur Region, should be prioritised for this type of growth, perhaps above more regional areas identified through the TOD SEPP precincts.

(k) the impact on localised environment and amenity values caused by the Transport Oriented Development Program

Campbelltown City Council would respectfully suggest that any re-zoning should be bespoke to the area, considering any localised studies and impacts and that Council is consulted prior to re-zoning. It is not yet known how the TOD Program will be sensitively applied to each of the locations identified.

(l) the existing or potential measures and programs analysed, considered or implemented by all NSW Government agencies to support additional housing density, including the housing series reports published by the NSW Productivity Commissioner

A key component of the reports published by the NSW productivity commissioner is building more homes where infrastructure costs less. Using this principle would promote locations where public transport infrastructure is already located, in line with the principles of TOD. Campbelltown LGA is served by 7 electrified train stations, and a range of other infrastructure relevant to TOD development in the Campbelltown LGA including:

- Lower open space acquisition costs as Campbelltown is well served with open space in public ownership compared to other Sydney LGA's
- There is a growing health and education cluster in Campbelltown City Centre with Campbelltown Hospital and private health institutions
- Campbelltown has existing connections to Port Kembla and direct rail connection to Sydney Kingsford Smith airport
- Campbelltown LGA hosts a large Western Sydney University campus, a number of TAFE facilities and retail centres.

Having regard to the Productivity Commissioners papers, it is unclear why there was not more widespread consultation with Local Government when identifying the TOD locations.

(m) the ten measures outlined in the National Cabinet's National Planning Reform Blueprint

The National Planning Reform Blueprint has three primary components.

The first component is the updating of state, regional and local strategic plans to reflect housing targets. This is considered to be an essential action if there is to be an alignment of

infrastructure with housing provision. We support the update to housing targets and note that Campbelltown has significant latent housing capacity to help achieve refined targets.

The second tenet of the blueprint is promoting medium and high-density housing in well-located areas close to existing public transport connections, amenities, and employment. We support these measures which mirror Campbelltown's strategic direction and the underlying principles of TOD.

The third main measure of the blueprint is streamlining approval pathways. While some work has been done in NSW, there is more that can be done to streamline the approval pathway for small to medium scale planning proposals, particularly where state agencies often require the level of detail in supporting studies that is ordinarily required at the DA stage. The NSW Government should undertake a pragmatic review of state agency expectations at the rezoning stage with a view to limiting study requirements, thereby also reducing cost, time, and risk to the developer, particularly where the relevant matters will be investigated at DA stage when there is more detail available on the proposed development.

(n) the development of Transport Oriented Development Program planning policies in other Australian state and territory and international jurisdictions

The Victorian State Government is reportedly investigating adjustments to car parking requirements on sites around public transport hubs. With an estimated cost of \$50,000 for each parking space in apartment developments, reducing or removing the number of parking spaces on well-located sites could ease the cost of new housing. This initiative could similarly be worthwhile for investigation in NSW's TOD program.

(o) the impacts of the proposed Diverse and Well-Located Homes process and program

Campbelltown City Council has made a submission to the Diverse and Well-Located Homes process and program. A copy of that submission is attached and was published in our March 2024 Business Papers at Item 8.2.

(p) the capability of Greater Sydney to provide for increased residential dwelling where the existing capacity has been diminished due to the effects of climate change

Council is not best placed to comment on this item; however it is observed that there is a much lower flood risk potential in Campbelltown City Centre than other locations across Sydney and that Campbelltown LGA has a much higher tree canopy coverage than other LGA's which builds its resilient to climate change. The Campbelltown City Centre Planning Proposal will consider the effects of dwelling increases on climate change, biodiversity, green space, and other environmental factors.

(q) the adequacy of measures to deter and punish the misuse of confidential market sensitive government information and the future processes that should be put in place

Council is not best placed to comment on this item.

(r) any other related matters.

N/A

Conclusion

We thank the Committee for the opportunity to inform their consideration of these issues. Due to timing constraints and Council's reporting requirements, this submission has not been endorsed by Council. We reserve the right to update the Committee, should Council determine any amendments following submission.

We look forward to working with the NSW Government and its agencies to contribute to housing supply in well-located areas and would be pleased to assist the Inquiry.

Should you wish to discuss the contents of this submission in more detail, please do not hesitate to contact Rebecca Grasso, Director City Futures at

Yours sincerely,

Lindy Deitz
General Manager