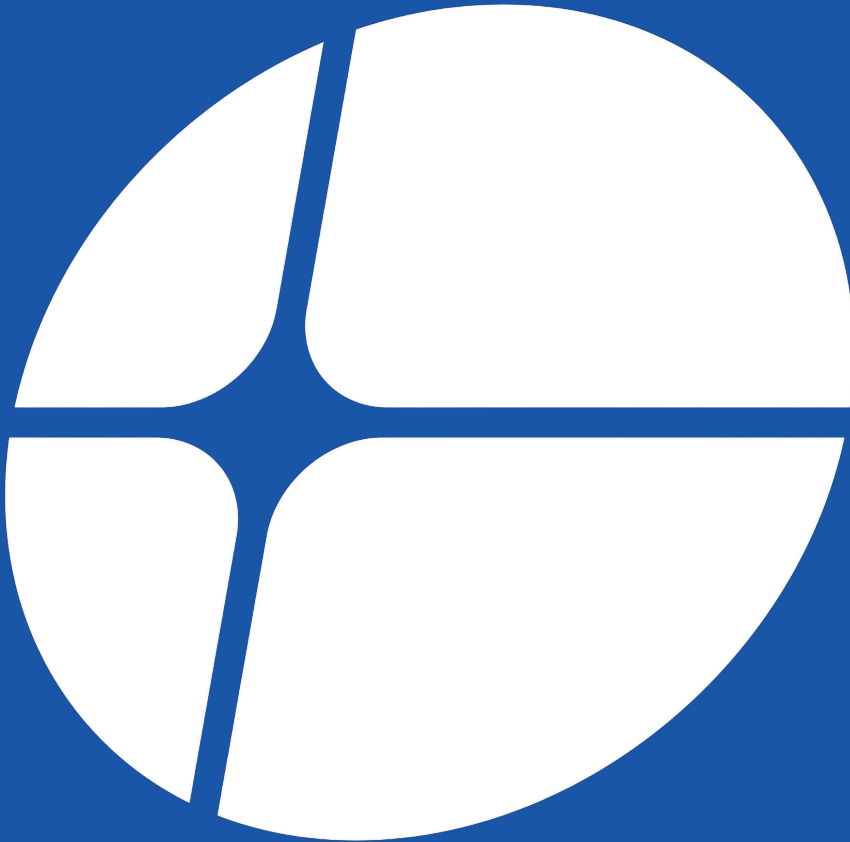


Environmental Impact Statement

State Significant Development Application
SSD 80482713



In-fill affordable housing

Site R3, Macarthur Gardens North

Prepared for Landcom
Submitted to Department of Planning, Housing and Infrastructure

September 2025

Overview and declaration

Project details	
Project name	Macarthur Gardens North
SSD number	SSD-80482713
Address	Macarthur Gardens North Precinct (Lot 1097/-/DP1182558)
Applicant details	
Applicant name	Landcom
Applicant address	Level 14, 60 Station Street Parramatta NSW 2150
Author details – person who prepared this document	
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Declaration by Registered Planner	
<p>I declare that this EIS:</p> <ul style="list-style-type: none"> • has been prepared in accordance with sections 190 and 192 of the Environmental Planning and Assessment Regulation 2021 • contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates • does not contain information that is false or misleading • addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project • identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments • has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement • contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development • contains a consolidated description of the project in a single chapter of the EIS • contains an accurate summary of the findings of any community engagement • contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole. 	
Name	Dan Keary BSc MURP RPIA
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Summary

This Environmental Impact Statement (EIS) has been prepared by Keylan Consulting Pty Ltd on behalf of Landcom (the applicant) to support a State significant development (SSD) application for a 100% affordable housing development containing 130 dwellings on land within the Macarthur Gardens North (MGN) Precinct in the Campbelltown local government area (LGA).

The proposal is classified as SSD in accordance with Chapter 2 of the *State Environmental Planning Policy (Planning Systems) 2021*. Under Schedule 1, Section 26 of the Planning Systems SEPP, development carried out by Landcom with an estimated development cost of more than \$30 million or resulting in more than 75 dwellings, whereby at least 50% of the gross floor area of the development will be used for the purposes of affordable housing, is considered to be of State significance.

This EIS has been prepared in line with the Secretary's Environmental Assessment Requirements (SEARs), issued by the Department of Planning, Housing and Infrastructure (DPHI) on 16 July 2025 and in line with its '*State Significant Development Guidelines – Preparing an Environmental Impact Statement*' as required by Part 8 of the *Environmental Planning and Assessment Regulation 2021*.

Site and context

The site is located within the Campbelltown LGA and is legally described as Lot 1097 in DP1182558. It is approximately 42km to the south-west of the Sydney Central Business District.

This SSD relates to part of Lot 1097 in DP1182558, known as site 'R3' within the MGN Precinct illustrated in red below. Therefore, reference to 'the site' throughout this report relates to Site R3 only, not the broader lot.



Figure 1: The site (Base source: Nearmap)

The site has an area of 4,895m² and is rectangular in shape. It directly adjoins Goldsmith Avenue to the north, which is a local road and provides access into the MGN precinct.

The site is fully cleared as it has undergone substantial civil works in accordance with Stage 1 of an existing Concept and Stage 1 development consent (DA reference number: 3944/2021/DA-SW) discussed below and in Section 1.3 of this EIS.

Concept and Stage 1 works approval

On 14 December 2022, a concept masterplan with stage 1 works was approved by Sydney Western City Planning Panel for the MGN Precinct.

In summary, the following was approved:

- concept master plan for a high density residential and mixed-use development within the MGN precinct
- construction of stage 1 of the master plan, encompassing roads, parks, civil works, landscaping and subdivision of the MGN Precinct into superlots
- indicative building envelopes for each superlot

The R3 site was approved for high density residential development with an indicative building envelope ranging from 3 to 9 storeys.

The approved civil works under Stage 1 have been largely completed for the site. No other Stage 1 works apply or are required to facilitate this SSD application.

Amendment to Concept DA

This SSDA also seeks to modify the existing concept development consent at the site pursuant to Section 4.17(5) and Section 4.24(4) of the *Environmental Planning and Assessment Act 1979*. The proposed changes include minor and practical amendments to the:

- building envelope
- prescribed Relative Levels (RLs)

These changes are in keeping with the intent of the approved concept plan and are intended to enable necessary structural elements/desired articulation, improve the bulk and scale of the proposal and amenity by creating a useable communal open space area.

Project description

The project elements are summarised in the table below.

Key element	Description
Project area	The site has a total area of 4,895m ² The site has a frontage of approximately: <ul style="list-style-type: none"> • 75m to Goldsmith Avenue (local road) to the north • 51m to a future local road along the western boundary which has been constructed in accordance with the Stage 1 concept approval (DA 394/2021/DA-SW and CC approval)

Key element	Description
Uses and activities	The proposal seeks approval for a 100% affordable housing development.
Physical layout and design	The proposed works, design and layout consist of: <ul style="list-style-type: none"> • two x 3 to 9 storey RFBs, including: <ul style="list-style-type: none"> ○ one basement parking level ○ 130 affordable housing dwellings including 13 adaptable units ○ communal open space at ground and level 3 • landscaping • residential amenities • site landscaping
Key elements	<ul style="list-style-type: none"> • maximum building height: 36.3m • FSR: 2.2:1 • total GFA: 10,671m² • total dwellings: 130 (49% 1-bed, 45% 2-bed and 5% 3-bed) • car parking: 63 (including 13 accessible and a wash bay) • motorcycle spaces: 0 • Bicycle: 26 residential spaces within the basement and 11 visitor spaces at the ground floor
Stages	The development is not proposed to be staged.
Phases	The proposed development will be undertaken in the following phases: <ol style="list-style-type: none"> 1. inground services 2. construction of buildings 3. landscaping and external works

Table 1: Project summary

The proposal provides 100% affordable housing and seeks to utilise the incentive controls under Chapter 2, Part 2, Division 1, Section 18 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) to achieve additional building height, noting the proposal is therefore compliant with the applicable controls.

Community engagement

Engagement has been undertaken with DPHI and the community as part of the development process.

DPHI engagement included a scoping meeting prior to the issuing of SEARs. In addition, a pre-lodgement meeting was held with Campbelltown City Council whilst community engagement included establishment of a website, a community pop up session and post card distribution was undertaken. Key themes raised by the community include connecting with Country, deep soil and native plantings and ensuring the appointment of a Community Housing Provider.

Landcom will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases by a series of measures outlined within Section 5.

Assessment and mitigation of impacts

This EIS provides a comprehensive assessment of the potential impacts associated with the development and issues identified in the SEARs. The EIS is supported by several specialist consultant reports to consider the potential impacts of the proposal.

Impacts considered within the EIS include:

- built form and visual impacts
- traffic and transport
- heritage
- geotechnical
- contamination
- noise and vibration
- biodiversity
- waste management
- sustainability
- wind
- stormwater and wastewater

This EIS demonstrates that the development complies with the relevant controls and that potential environmental impacts are minimal and can be appropriately managed through a series of mitigation measures as set out below.

Project justification

The EIS has assessed the proposal in line with the strategic planning framework and statutory planning framework and has also considered the likely environmental impacts and the required mitigation measures as a result. The EIS concludes that the proposal is justified and will result in significant public benefit as set out below:

- The development will provide 130 affordable housing on a site, consistent with the Concept DA which approved the site for high density residential development
- The proposal delivers significant housing on a well-located site near transport, including the Macarthur Train Station, amenities and jobs
- The proposal is consistent with the strategic planning context including the following policies and strategies:
 - National Housing Accord
 - Greater Sydney Region Plan 2018
 - Western Parkland City District Plan 2018
 - Greater Macarthur 2040 (interim plan) 2018
 - Guide to the Greater Macarthur Growth Area 2022

- Future Transport 2056 Staying Ahead: NSW State Infrastructure Strategy
- Glenfield to Macarthur Urban Renewal Corridor Strategy 2015
- Macarthur Precinct Plan 2017
- Campbelltown Local Strategic Planning Statement 2020
- Campbelltown Local Housing Strategy 2041
- The proposal supports the development of a vacant and/or underutilised site within the Campbelltown LGA.
- The proposal will facilitate a \$103,491,570.60 (including GST) investment into the construction of the site.
- The development will support approximately 127 jobs over the construction period resulting in significant social benefits for the Campbelltown LGA.
- The site is suitable for the development considering:
 - there is an existing concept and stage 1 DA which approves the use and bulk and scale of the proposal
 - the site was identified for high density residential development under the Guide to the Greater Macarthur Growth Area 2022
 - the proposal is compatible with the emerging high-rise, mixed-use locality approved for the MGN precinct
 - the proposal collocates density with existing services including public transport (Macarthur Train Station) and educational establishments (Western Sydney University and TAFE)
 - the proposal aligns with the objectives of the R4 High Density zone which applies to the site

1 Introduction

This EIS supports a SSD application for an affordable housing development on land within the Macarthur Gardens North (MGN) precinct in the Campbelltown Local Government Area (LGA).

The MGN precinct is legally identified as Lot 1097 in DP1182558. The subject SSD relates to part of Lot 1097 in DP1182558 known as site 'R3'.

The application is lodged under section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The SSD application specifically seeks consent for:

- construction of two 3 to 9 storey residential flat buildings, including:
 - one basement parking level with 62 car parking spaces
 - 130 affordable housing dwellings including 13 adaptable
 - at grade and level 3 communal open space
- residential amenities
- site landscaping

The proposal is classified as SSD under Section 26(2) of Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP) as the development is carried out by Landcom with an Estimated Development Cost (EDC) of more than \$30 million and 100% of the Gross Floor Area (GFA) will be used for the purposes of affordable housing.

The proposal provides 100% affordable housing and seeks to utilise the incentive controls under Chapter 2, Part 2, Division 1, Section 18 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) to achieve additional building height.

This SSDA also seeks to modify the existing concept development consent at the site (3944/2021/DA-SW/A) pursuant to Section 4.17(5) and Section 4.24(4) of the EP&A Act. The proposed changes include minor practical amendments to the:

- building envelope
- prescribed Relative Levels (RLs)

These changes are intended to enable necessary structural elements/desired articulation, improve the bulk and scale of the proposal and amenity by creating a useable communal open space area.

The EDC for the project is estimated at \$103,491,570.60 (including GST) and an Estimated Development Cost Report is at Appendix 1.

On 16 July 2025, Secretary's Environmental Assessment Requirements (SEARs) were issued and the project was assigned the application number SSD-80482713. Revised SEARs were subsequently issued on 16 July 2025 which retained the same application number

Consideration of the revised SEARs is provided at Appendix 2.

The Applicant's details are provided in the table below.

Applicant	Details
Name	Landcom
Address	Level 14, 60 Station Street Parramatta NSW 2150
ABN	79 268 260 688

Table 2: Applicant details

Landcom is proposing to develop the site. Upon construction completion, the site will be sold to a registered Community Housing Provider (CHP).

1.1 Site description

The site is located south of Goldsmith Avenue within the Campbelltown LGA and is legally described as Lot 1097 in DP1182558. It is approximately 42km to the south-west of the Sydney Central Business District.

As shown within the figure below, Lot 1097 in DP1182558 comprises the entire MGN precinct (yellow dashed line).

This SSD relates to part of Lot 1097 in DP1182558 known as site 'R3' (and referred to as 'the site' throughout this report). The site has an area of 4,895m² and is rectangular in shape (see red outlined area). It directly adjoins Goldsmith Avenue to the north, which is a local road and provides access into the MGN precinct.

The site is fully cleared as it has undergone substantial civil works in accordance with Stage 1 of an existing Concept and Stage 1 development consent (DA reference number: 3944/2021/DA-SW) which is discussed in further detail in Section 1.3 of this report.



Figure 2: Site Context (Base Source: Nearmap)

1.2 Surrounding context

As noted above, the remaining portion of Lot 1097 in DP1182558 comprises the MGN precinct which is currently being developed as a residential and mixed-use precinct.

The MGN precinct has also undergone substantial works including civil works and road construction in accordance with Stage 1 of 3944/2021/DA-SW, discussed in Section 1.3.

As shown within Figure 2, the broader context is characterised by educational establishments, road and rail infrastructure, public recreation areas, commercial, retail and residential uses. Specifically, the MGN Precinct is surrounded by the following features:

- North: Western Sydney University and TAFE NSW Campbelltown
- South: Bow Bowling Creek, Macarthur Train Station, Railway line and Macarthur Square Shopping Centre
- East: entry marker and associated landscaping for Western Sydney University, road infrastructure and Gilchrist Oval
- West: public open space

Importantly, the site is:

- strategically located within the Glenfield to Macarthur Urban Renewal Corridor (discussed further in Section 1.3) which is identified by DPHI as a corridor to accelerate housing and jobs
- highly accessible and well serviced as it is in close proximity to Macarthur Train Station (340m south), Macarthur Square Shopping Centre (440m south), Gilchrist Oval (130m east), Campbelltown TAFE (160m north) and Western Sydney University (450m)

The broader site location is shown within the figure below.



Figure 3: Surrounding context (Base Source: Nearmap)

1.3 Background

1.3.1 Relevant history

A concept masterplan with stage 1 works, as modified, and a modification application has been approved for the MGN precinct (Lot 1097 in DP1182558) and therefore applies to the site.

A description of these applications is provided within the table below.

Application	Summary of the application	Status
3944/2021/DA-SW	<p>The application proposed:</p> <ul style="list-style-type: none"> • concept master plan for a high density residential and mixed-use development known as Macarthur Gardens North • construction of stage 1 of the master plan, encompassing roads, parks, civil works, landscaping and subdivision of the site into superlots <p>An extract of the approved masterplan is provided in the figure below. As shown, Site R3 is approved for high density residential development. The broader MGN site is approved for high density residential, mixed-use and recreation uses.</p> <p>The approved civil works under Stage 1 have been completed for the site. No other Stage 1 works apply or are required to facilitate this SSD application.</p>	Approved by the Sydney Western City Planning Panel on 14 December 2022
3944/2021/DA-SW/A	<p>The modification proposed:</p> <ul style="list-style-type: none"> • inclusion of an additional allotment to enable separate dedication of the planned fitness park to Council (further subdivision of lot 10 to create lot 19) • to subdivide Lot 14 into two separate allotments • to amend condition 63 to remove the requirement to pay contributions and replace it with requirement of execution of a Voluntary Planning Agreement • to correct the arborist report date in condition 33 	Approved on 9 February 2024

Table 3: MGN planning history

An extract of the approved masterplan is provided in the figure below. As shown, Site R3 is approved for high density residential development. The broader MGN site is approved for high density residential, mixed-use and recreation uses.

The approved civil works under Stage 1 have been completed for the site. No other Stage 1 works apply or are required to facilitate this SSD application.

This SSD seeks a further modification to 3944/2021/DA-SW/A. The modification seeks minor variations to the approved concept building envelope and stamped (Reduced Levels) RLs for Site R3 pursuant to Section 4.24 of the EP&A Act. This variation is discussed further in Sections 3.2.9 and 6.1.

This SSDA also seeks to modify the existing concept development consent at the site (3944/2021/DA-SW/A) pursuant to Section 4.17(5) and Section 4.24(4) of the EP&A Act. The proposed changes include minor practical amendments to:

- the building envelope
- RLs

These changes are intended to improve residential amenity and bulk and scale impacts.

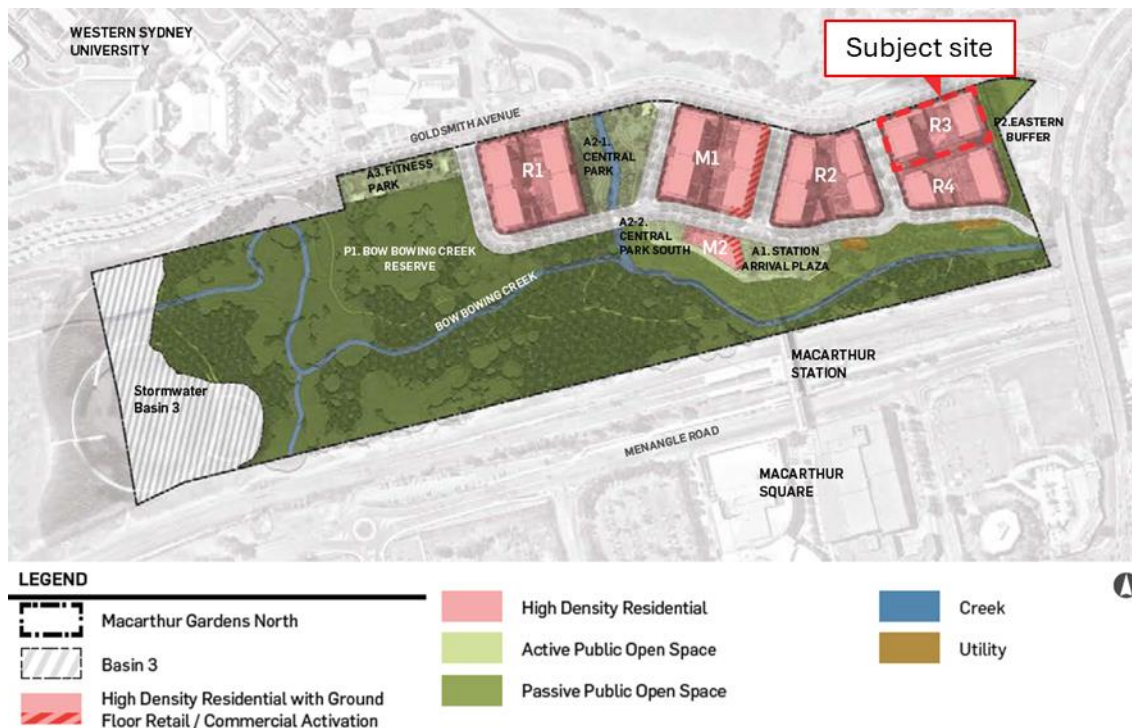


Figure 4: Approved Land Use Strategy (Base source: Urbis Urban Design and Landscape Report for 3944/2021/DA-SW)

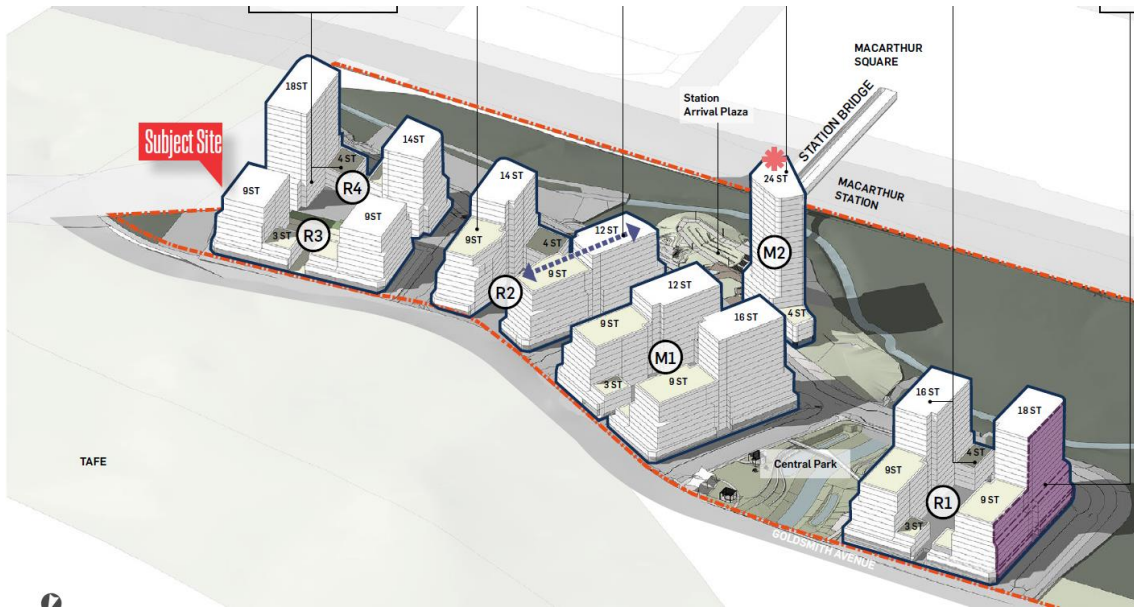


Figure 5: MGN Precinct (Source: Urbis Urban Design and Landscape Report for 3944/2021/DA-SW)

1.4 Related development

There is a Planning Proposal currently under assessment which applies to the broader MGN precinct but which excludes the site (Site R3). Details are provided below.

Planning Application	Summary	Status
Macarthur Gardens North (Lot 1097 DP1182558) SARP (no application number)	<ul style="list-style-type: none"> Increases building heights from 9 to 24 storeys in the southern areas Increases site capacity from 1,250 to approximately 1,625 homes (375 additional homes) Allocates 10% of homes for affordable housing Rezones land along the Bow Bowing Creek reserve to RE1 Public Recreation and removes the provision for maximum building heights in these areas 	Under assessment

Table 4: Planning Proposal relating to the subject site

2 Strategic context

2.1 Strategic justification

The proposed development aligns with the strategic context by delivering a significant number of affordable housing units within the Campbelltown LGA. The site and broader MGN precinct leverages off existing transport infrastructure to accommodate growth and contribute to the long-term liveability and prosperity the Campbelltown LGA.

Importantly, as discussed in Section 1.3, the strategic merit of the site and proposal has been assessed and approved (3944/2021/DA-SW). This SSD reinforces the strategic merit of high density, affordable housing on the site, specifically that the:

- site is:
 - vacant and underutilised
 - identified for high density residential development through its zoning and an approved concept masterplan
 - strategically located site within the Glenfield to Macarthur Urban Renewal Corridor and in proximity to the transport and educational infrastructure including Macarthur Train Station, Western Sydney University and Campbelltown TAFE
- proposal is consistent with the R4 High Density Residential zone objectives
- proposal will provide substantial public benefits including:
 - provision of affordable housing in an accessible location
- investment into the economy as 127 jobs are created during construction

2.1.1 Alignment to state, district and local strategic plans and policies

In addition to the above, the proposed development is aligned with the applicable state, district and local strategic plans and policies as set out below. An in-depth assessment of the proposal against each is at Appendix 3.

Type of strategy	Relevant plan/policy
State plans and strategies	<ul style="list-style-type: none"> • National Housing Accord • Greater Sydney Region Plan 2018 • Western Parkland City District Plan 2018 • Greater Macarthur 2040 (interim plan) 2018 • Guide to the Greater Macarthur Growth Area 2022 • Future Transport 2056 • Staying Ahead: NSW State Infrastructure Strategy • Glenfield to Macarthur Urban Renewal Corridor Strategy 2015 • Macarthur Precinct Plan 2017
State Environmental planning policies	<ul style="list-style-type: none"> • (Housing) 2021

Type of strategy	Relevant plan/policy
	<ul style="list-style-type: none"> • (Planning Systems) 2021 • (Sustainable Buildings) 2022 • (Resilience and Hazards) 2021 • (Transport and Infrastructure) 2021 • (Biodiversity and Conservation) 2021
Local plans and policies	<ul style="list-style-type: none"> • Campbelltown Local Environmental Plan 2015 (CLEP 2015) • Campbelltown Local Strategic Planning Statement 2020 • Campbelltown Local Housing Strategy 2041

Table 5: Applicable state, district and local strategic plans and policies


2.2 Key features of the site and surrounding that could affect or be affected

The site is located in the north-eastern corner of the MGN precinct and is currently a large, excavated, vacant lot. As outlined within Section 1.3, the MGN precinct has received concept approval to develop high density residential and mixed use development.


The broader locality is generally characterised by a mix of educational establishments, road and rail infrastructure, commercial and retail uses.


As shown on the figures below, the lot is affected by a bushfire hazard. It is not affected by flood, acid sulphate soils or mine subsidence constraints. The site does not contain any heritage items.


Legend

 Campbelltown City LGA

Category

 Vegetation Category 1

 Vegetation Category 2

 Vegetation Category 3

 Vegetation Buffer



Figure 6: Bush Fire Prone Land Map (Source: Campbelltown City Council)

2.3 Potential cumulative impacts

The cumulative impacts of the MGN precinct (including Site R3) were assessed and approved as part of the concept approval (3944/2021/DA-SW). Given the proposal remains largely consistent with the concept approval, the conclusions relating to the cumulative impacts remain relevant.

Notwithstanding, the key potential cumulative impact specific to site R3 have been assessed and addressed in Section 6 in accordance with the DPHI's Assessing Cumulative Impacts Guidelines. In summary, the potential cumulative impacts include:

- construction noise and vibration
- traffic generation
- visual impact

2.4 Analysis of feasible alternatives

Division 5 of Part 8, section 192 of the *Environmental Planning and Assessment Regulation 2021* requires an analysis of any feasible alternatives to the carrying out of the development, including any feasible alternatives.

The alternatives to the proposal are set out in Table 6 below.

Option	Assessment
Do nothing	<p>An option to leave the site in its current condition and 'do nothing' was considered and dismissed. This option is inconsistent with the project objectives to:</p> <ul style="list-style-type: none"> • Fulfill the intended use of the site as per its zoning and consistent within the concept DA approved by the Sydney Western City Planning Panel. • Provide much-needed affordable housing within the Campbelltown LGA, which is collocated with high-quality existing public transport services with linkages to the wider Sydney network. • Provide a high-level of amenity for residents and visitors through well design apartments, the new communal open space and landscaping. • Generate employment during the construction phase of the development. • Further, the do nothing option would fail to utilise the site's full potential as it would not contribute to housing supply and affordability in the area, nor would it align with the objectives of the <i>State Environmental Planning Policy (Housing) 2021</i>.
Alternative Design	<ul style="list-style-type: none"> • Flexibility to change the design is constrained by the parameters of the concept approval (3944/2021/DA-SW). • Notwithstanding, several options were explored to ensure the best amenity outcome for the site including: <ul style="list-style-type: none"> ○ appropriate locations of deep soil and communal amenities ○ appropriate bulk and scale when viewed from the public domain • The proposed design was selected as it remains largely consistent with the approved concept DA and provides the best amenity outcome. Specifically, it:

Option	Assessment
	<ul style="list-style-type: none"> ○ reflects the site's size and capacity for the construction of two RFBs ○ complies with the minimum cross ventilation requirements of amenity aspects of the Apartment Design Guide (ADG) ○ provides for a high-quality landscape setting for development. ○ maximises amenity for future residents on the site
Alternative location	<ul style="list-style-type: none"> ● An alternative site would be inconsistent with the approved concept masterplan and overall strategic vision for the site and therefore was not considered.

Table 6: Analysis of feasible alternatives

2.5 Agreements with other parties

On September 2024, Council and the Applicant entered into the Macarthur Gardens North Planning Agreement (Appendix 4) under Section 7.4 of the EP&A Act.

The Agreement includes several provisions including payment of monetary contributions, land dedication and carrying out of works.

The payment of monetary contributions under this Agreement is discussed further in Section 4.3.

3 Project description

3.1 Project overview

The objectives of the proposed development are to:

- facilitate a 100% affordable housing development
- deliver a development of high architectural merit which aligns with an approved concept DA and objectives of the R4 High Density Residential zone
- collocate housing with key services and infrastructure (University, TAFE, Macarthur Train Station and Macarthur Square Shopping Centre)
- diversify housing supply options and dwelling mixes within the Campbelltown LGA

The table below provides a summary of each key element of the proposal.

Key element	Description
Project area	<p>The site has a total area of 4,895m²</p> <p>The site has a frontage of approximately:</p> <ul style="list-style-type: none"> • 75m to Goldsmith Avenue (local road) to the north • 51m to a future local road along the western boundary which has been constructed as part of the Stage 1 concept approval and Construction Certificate 17674
Uses and activities	<p>The proposed development comprises 100% affordable housing and will service key workers to enable people to live and work within the Campbelltown LGA. The building will be managed by a registered CHP from Landcom's Affordable Housing Panel and managed as affordable housing for a minimum of 15 years. This is outlined in the letter of intent contained at Appendix 13.</p>
Physical layout and design	<p>The proposed works, design and layout consist of:</p> <ul style="list-style-type: none"> • two x 3 to 9 storey RFBs, including: <ul style="list-style-type: none"> ○ one basement parking level ○ 130 affordable housing dwellings including 13 adaptable units ○ Communal open space at ground and level 3 • landscaping • residential amenities • site landscaping <p>Montages of the proposal are provided within Error! Reference source not found., Figure 7 and Figure 8 below.</p>
Key elements	<ul style="list-style-type: none"> • maximum building height: 36.3m • FSR: 2.2:1 • total GFA: 10,671m² • total dwellings: 130 (50% 1-bed, 45% 2-bed and 5% 3-bed) • car parking: 63 (including 13 accessible and a wash bay)

Key element	Description
	<ul style="list-style-type: none"> motorcycle spaces: 0 bicycle: 26 residential spaces within the basement and 11 visitor spaces at the ground floor
Stages	The development is not proposed to be staged.
Phases	<p>The proposed development will be undertaken in the following phases:</p> <ol style="list-style-type: none"> inground services construction of buildings landscaping and external works

Table 7: Main elements of the project



Figure 7: Perspective looking south from Goldsmith Avenue (Source: DKO Architecture)



Figure 8: Perspective from the communal open space (Source: DKO Architecture)

3.2 Detailed description

3.2.1 Project area

The site has a total area of 4,895m². The extent of the site is shown in the figure below figure below.



Figure 9: Site Plan (Source: DKO Architecture)

3.2.2 Demolition and earthworks

No demolition works are proposed. The site does not contain any buildings and has been excavated in accordance with the Stage 1 concept DA (refer to Section 1.3 and Figure 2). Minor earthworks will be required to establish the ground levels for the building as detailed within the Civil Engineering Report (Appendix 23)

3.2.3 Physical layout and design

Built form

Architectural Plans and an Architectural Design Report have been prepared by DKO Architecture and are included as Appendix 5 and Appendix 6 respectively.

The proposed development includes one level of basement car parking and presents as two, 3-9 storey RFBs. The two RFBs evenly distribute GFA across the site and include diverse dwelling mixes ranging from 1 to 3 bedroom units.

As discussed in Section 1.3, a concept masterplan has been approved for the site which establishes building envelopes for the site. Importantly, the approved envelopes include:

- stepping of the upper levels to articulate the built form
- well defined street entrances
- ADG compliant building separation distances which enable a large, at grade, centrally located communal open area

The extent of the approved building envelope is indicated by the red outlined area on the figures below. As shown, the proposal largely aligns with the approved scheme noting:

- The building mass has been reduced in some areas to produce a more slender design and reduce the bulk and scale.
- There are some areas which encroach outside the approved envelope i.e. for necessary structural elements and articulation purposes. However, these are minor in nature and have an insignificant impact on the proposal's overall consistency with the concept DA scheme. The amendments are further discussed in Section 3.2.9.

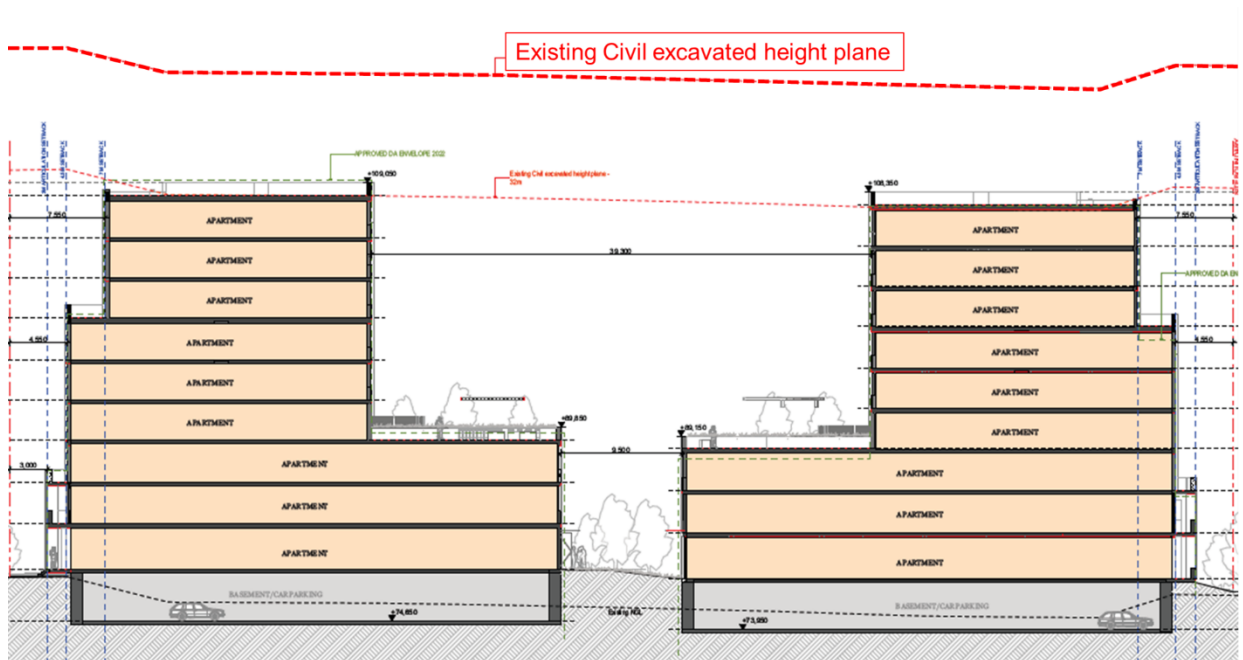


Figure 10: North to south elevation (Source: DKO)

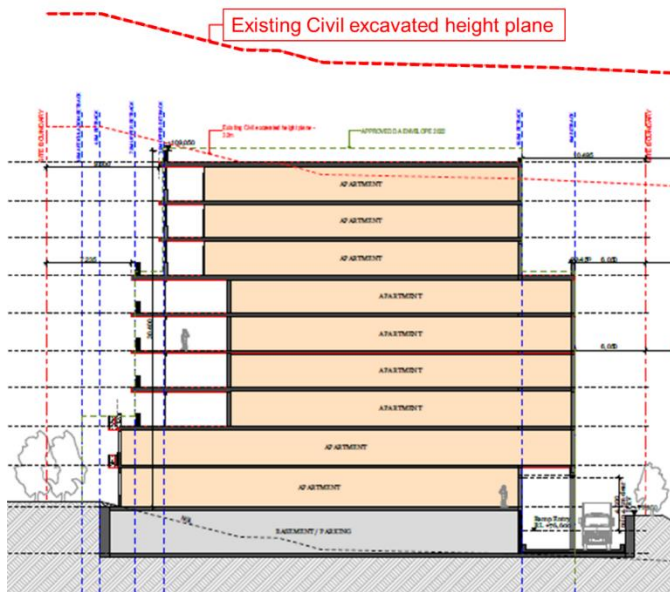


Figure 11: West to east elevation (Source: DKO)

Setbacks

The concept approval established setbacks to ensure good streetscape character, encourage casual surveillance and providing adequate space for tree planting. These setbacks have been reproduced within the table below.

As noted above, there are some areas (identified in bold) which depart from these controls however, are minor and practical in nature and in total are equivalent to 0.32% of the total building envelope.

Site boundary	Setback control from concept DA	Compliant?
North (frontage to Goldsmith Ave)	<ul style="list-style-type: none"> • Ground Floor (GF): 4.5m (including 1.5m articulation zone within the 4.5m) • L1: 3m (including 1.5m articulation zone within the 3m) • L2-L5: 7.5m (noting allowance is made for private open space on level 3) • L6-L9: 10m 	GF: Yes
		L1: Yes
		L2: Yes
		L3-L9: No 370mm non-compliance in facade articulation (localised)
		L6-L9(roof): 555mm non-compliance in facade articulation (localised)
West (secondary street frontage)	<ul style="list-style-type: none"> • GF-L6: 4.5m (including 1.5m articulation zone for GL and L1) • L7-L9: 7m • Provide direct access from the street for all ground floor apartments. Lobby entrances are to be clearly articulated and accessible from street level. 	GF-L1: No, 150mm non-compliance in facade articulation (localised in 5 brick columns)
		L2-L5: No, 150mm non-compliance in facade articulation (localised)
		L6-L9: Yes

Site boundary	Setback control from concept DA	Compliant?
East (Central Park Frontage)	<ul style="list-style-type: none"> GF-L6: 4.5m (including 1.5m articulation zone for GL and L1) 	GF-L1: No, 150mm non-compliance in facade articulation (localised in 5 brick columns)
	<ul style="list-style-type: none"> L7-L9: 7m Provide direct access from the street for all ground floor apartments. Lobby entrances are to be clearly articulated and accessible from street level. 	L2-L5: No, 150mm non-compliance in facade articulation (localised)
		L6-L9: Yes
South (Boundary to Site R4 in the MGN precinct)	<ul style="list-style-type: none"> N/A - no control specified in the setback strategy. <ul style="list-style-type: none"> It is noted the building envelope approved a 6m and 10.5m setback from the southern boundary and this is what is used to assess compliance. 	GF-L3: No, 50mm non-compliance in facade articulation beyond Concept Envelope
East West internal (facing communal open space)	<ul style="list-style-type: none"> N/A - no control specified in the setback strategy. <ul style="list-style-type: none"> 39m building separation (Concept Envelope) 	GF-L9: No, approx 150mm non-compliance in facade articulation, (localised)

Table 8: Proposed setbacks

Height

The CLEP 2015 prescribes a maximum building height of 32m. As shown within the figure below, the proposal sits above the 32m height plane.

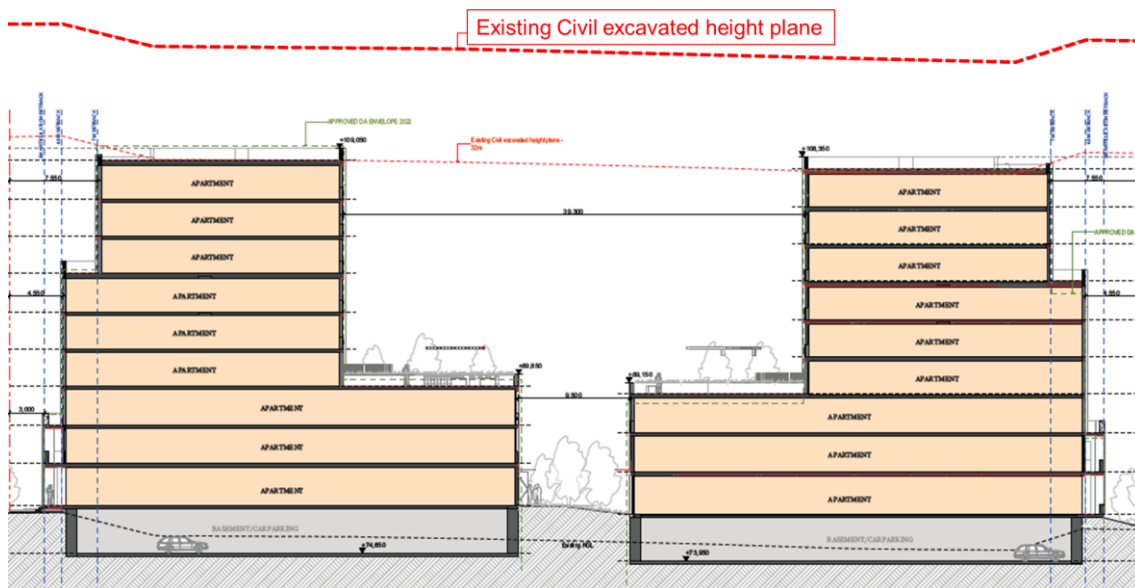


Figure 12: Proposed height (Source: DKO)

However, as the proposal provides 100% affordable housing it utilises the incentive controls under Chapter 2, Part 2, Division 1, Section 18 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) to achieve additional building height.

The maximum permissible building height for the site therefore is 41.6m under the Housing SEPP. As shown within the figure below, the maximum building height (measured from existing ground level) proposed is 36.3m and therefore is compliant. This is further discussed further in Appendix 9.

Materials and finishes

As shown within the below figure, the proposal has been designed to incorporate a mix of materials and finishes to respond to the surrounding environment and add visual interest to the building's design.

These materials and finished have been carefully selected and designed with regard to Connecting to Country principles as outlined within Appendix 6 and Section 6 of this EIS.

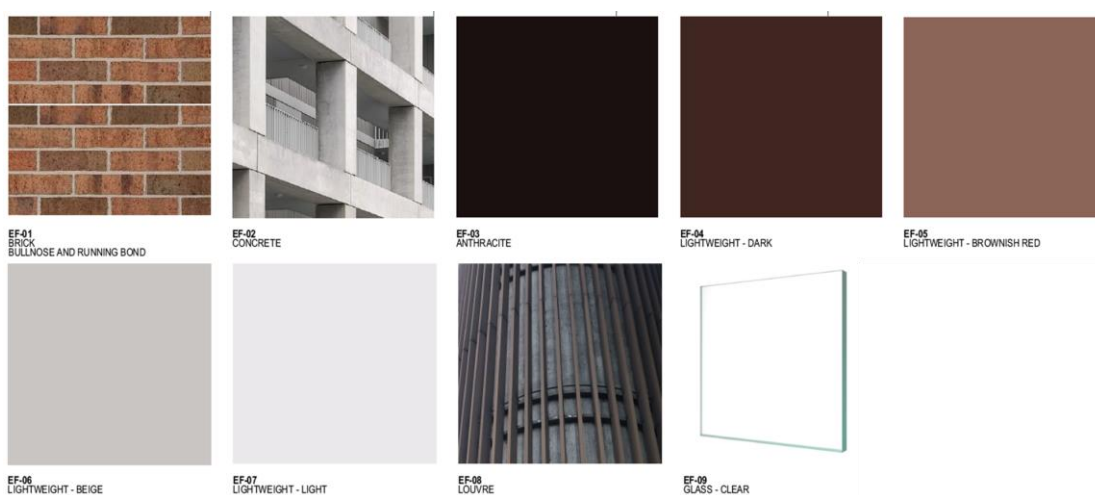


Figure 13: Material schedule (Source: DKO)

3.2.4 Landscaping

A comprehensive landscaping scheme has been prepared. The planting scheme and details are included in the Design Report (Appendix 8).

The proposed landscape design provides a high amenity environment for occupants by including a series of pathways, seating areas, sculptures, an entry feature and planting at ground and on level 3. The design also facilitates an appropriate interface with future neighbouring dwellings within the broader MGN precinct and the general public domain. An extract of the Landscape Masterplan is provided within the figures below.



Figure 14: Ground Plane & Landscape Plan (Source: Taylor Brammer)



Figure 15: Level 3 Landscape Plan (Source: Taylor Brammer)



Figure 16: Landscape sections (Source: Taylor Brammer)

3.2.5 Access and parking

Access

As indicated by the red arrow in the figure below, vehicular ingress and egress is proposed from an unnamed road along the western boundary. This road has been constructed as part of the Stage 1 approval (3944/2021/DA-SW) and will be dedicated to Council following completion of all precinct works.

The vehicle access is a single driveway into the basement which facilitates two-way traffic movements. The access point was selected as it maximises the distance away Goldsmith Avenue and minimises the risks of vehicle queuing and impacting the operation of the adjacent road network.

As indicated by the purple arrows on the figure below, the site is highly accessible and has four pedestrian entrances; one along the western boundary, two along the northern boundary and one along the eastern boundary.



Figure 17: Proposed access indicated by the red arrow (Base source: DKO)

Parking

Car parking is proposed wholly underground in the basement level and comprises 63 spaces.

Bicycle parking is provided on ground level and basement level as described in Table 1. Access to bicycle parking within the basement is provided via lifts on the ground floor.

3.2.6 Use

The proposed use is wholly residential, specifically 100% affordable housing which will service key workers to enable people to live and work within the Campbelltown LGA.

3.2.7 Operational management

Landcom is proposing to construct the buildings. Upon construction completion, the site will be sold to a registered CHP, who will take responsibility for the ongoing operational management of the complex.

The CHP will be engaged through the Landcom Affordable Housing Delivery Panel (AHDP) formed on 19 August 2024.

The AHDP is a pre-assessed panel of capable CHPs for the delivery of Affordable Housing projects. The AHDP provides a streamlined bidding process and platform for feedback. Landcom has the flexibility to choose from one of the several CHPs in the AHDP which best suit the project.

3.2.8 Timing

It is anticipated construction activities will occur over a 40 month period, once consent is obtained.

3.2.9 Amendments to Concept approval

As noted in Section 3.2.3, the proposal will result in inconsistencies with the approved Concept DA (3944/2021/DA-SW). Specifically, the approved envelope and prescribed RLs.

Variations to the approved envelope include encroachments into the setbacks and increased height. The variations are sought to:

- improve the bulk and scale of the proposal
- enable necessary structural elements and desired articulation

Variations to the approved RLs is necessary to provide a usable communal open space on ground level. As shown in the figure below, the RLs left unchanged will result in a drop of 2m (equivalent to a 22 degree slope or 1/4.5 grade) and an area with poor usability and amenity.

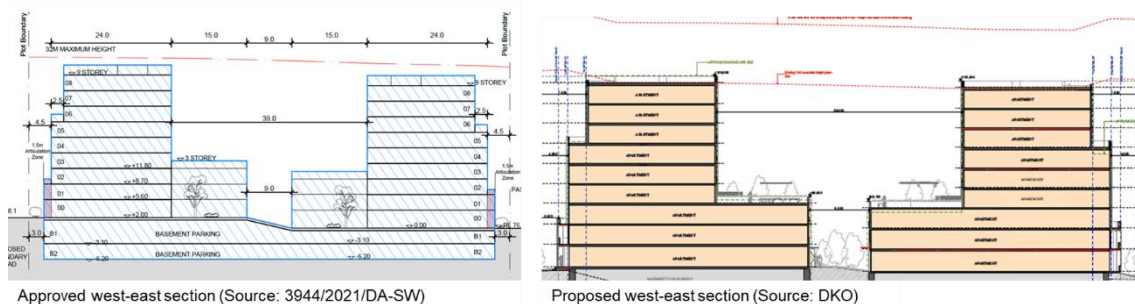


Figure 18: Approved vs proposed elevations (Source: Concept approval 3944/2021/DA-SW and DKO)

The amendments are considered minor in nature and overall, have an insignificant impact on the proposal's consistency with the concept DA scheme.

To facilitate the abovementioned amendments, the imposition of a condition of consent is requested under Section 4.17(1)(b) to modify 3944/2021/DA-SW/A enabled by Section 4.24(3) and (4) of the EP&A Act, as reproduced below (bold our emphasis):

(1) The provisions of or made under this or any other Act relating to development applications and development consents apply, except as otherwise provided by or under this or any other Act, to a concept development application and a development consent granted on the determination of any such application.

(2) While any consent granted on the determination of a concept development application for a site remains in force, the determination of any further development application in respect of the site cannot be inconsistent with the consent for the concept proposals for the development of the site (the concept consent).

(3) Subsection (2) does not prevent the modification in accordance with this Act of a consent granted on the determination of a concept development application.

(4) Subsection (2) does not prevent the determination of a further development application for the site that is inconsistent with the concept consent if the consent authority determines the application by granting development consent subject to a condition requiring the modification or surrender of the concept consent.

As confirmed by the NSW Land and Environment Court ruling in *Waverly Council v C M Hairis Architects (2002) NSWLEC 180*, the power to modify a consent under Section 4.24 as detailed above is separate from the modification power under Section 4.55 of the EP&A Act.

Specifically, Condition 1 of 3944/2021/DA-SW/A is proposed to be amended as outlined in Appendix 20.

It is requested that a condition be imposed on any approval of this SSD application pursuant to Section 4.17(1)(b) of the EP&A Act, which requires the below mentioned modifications to the Concept Approval in accordance with the procedures under Section 67 of the EP&A Regulation. The amendment of the Concept Approval by way of condition would ensure consistency between the original Concept Approval and this application, upon commencement of the latter consent.

4 Statutory context

This application has been prepared pursuant to Part 4 of the EP&A Act. Further, this application is an SSD application pursuant to section 4.12(8) of the EP&A Act and requires development consent under section 4.2 of the EP&A Act.

The following legislation and environmental planning instruments (EPIs) are relevant to the proposal:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *Biodiversity Conservation Act 2016*
- *Contaminated Land Management Act 1997*
- *Rural Fires Act 1997*
- *National Parks and Wildlife Act 1974*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *State Environmental Planning Policy (Housing) 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *Campbelltown Local Environmental Plan 2015 (CLEP 2015)*
- *Campbelltown Development Control Plan 2015 (CDCP 2015)*

The legislation and EPIs above have been addressed in detail at Appendix 9 and specific key considerations are addressed within the sections below.

Category	Comment
Power to grant approval	<p>The proposal is declared SSD under the following sections of the Planning Systems SEPP:</p> <ul style="list-style-type: none"> • Section 2.6(1)(b) declares development specified in Schedule 1 as SSD • Schedule 1 (26) as the development: <ul style="list-style-type: none"> ○ is on behalf of Landcom ○ has an EDC greater than \$30 million ○ results in more than 75 dwellings ○ more than 50% of the GFA is used for the purposes of affordable housing <p>The Minister for Planning and Public Spaces (or the Minister's delegate) is the consent authority pursuant to Section 4.5(a) of the EP&A Act.</p> <p>Further, Section 4.24 of the EP&A Act provides the consent authority power to grant approval despite inconsistencies with a concept DA approval.</p>

Category	Comment
Permissibility	<p>The site is zoned R4 High Density Residential under the CLEP 2015.</p> <p>Development for the purposes of a Residential Flat Building is permissible with consent in the zone.</p>
Other approvals	<ul style="list-style-type: none"> • <i>Biodiversity Conservation Act 2016</i> (BC Act 2016): A BDAR waiver request has been submitted to DPHI (Appendix 12) which confirms the proposed development is not likely to have any significant impact on biodiversity values. Therefore, a Biodiversity Development Assessment Report (BDAR) is not required. • <i>Roads Act 1993</i>: As per Section 4.44(2) of the EP&A Act, the proposal is not integrated development as the Applicant (Landcom) is a Crown authority. Therefore, approval under Section 138 of the Roads Act 1993 is not required. • <i>National Parks and Wildlife Act 1974</i>: Although an Aboriginal heritage impact permit under Section 90 of the NPW Act is not required for an SSD (per section 4.41(d) of the EP&A Act), an Aboriginal Cultural Heritage Assessment Statement has been prepared as part of the SSDA and is included at Appendix 28
Pre-condition to exercising the power to gain approval	Pre-conditions to exercising the power to gain approval are discussed at Section 4.14.1 addressed in detail at Appendix 9
Mandatory matters for consideration	Mandatory matters for consideration are discussed at Section 4.2 addressed in detail at Appendix 9

Table 9: Statutory requirements relevant to the project

4.1 Pre-conditions

The table below outlines the pre-conditions to exercising the power to grant approval that are applicable to the project and the relevant section where these matters are addressed within this EIS.

Pre-condition	EIS ref.
Biodiversity Conservation Act 2016	
<p>In accordance with the BC Act 2016, biodiversity impacts must be assessed as part of any SSDA, including the provision of a BDAR where required. Section 7.14 of the BC Act requires the consent authority to consider the likely impact of the proposed development on biodiversity values.</p> <p>A BDAR waiver request has been submitted to DPHI (Appendix 12) which confirms the proposed development is not likely to have any significant impact on biodiversity values. Therefore, a BDAR is not required.</p>	Section 6

Pre-condition	EIS ref.
State Environmental Planning (Housing) 2021	
<p>Section 147 of the SEPP requires the consent authority to consider Schedule 9 of the SEPP, ADG and any advice received from a design review panel.</p> <p>Accordingly, DKO has prepared a Design Report (Appendix 6) which includes:</p> <ul style="list-style-type: none"> • a compliance assessment against Schedule 9 of the Housing SEPP, the ADG • a table with detailed responses to the Landcom Design Review and State Design Review Panel feedback <p>This EIS has also considered the above-mentioned matters and provides a detailed analysis within Appendix 9.</p>	Appendix 9
State Environmental Planning Policy (Resilience and Hazards) 2021	
<p>Section 4.6 of the Resilience and Hazards SEPP requires that a consent authority must not grant consent for development on any land unless:</p> <ul style="list-style-type: none"> • it has considered whether the land is contaminated • if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and • if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose. <p>A Contamination Assessment was prepared as part of the concept DA approval and determined that the site is suitable for residential uses and that a Detailed Site Investigation and Remediation Action Plan is not required. A Supplementary Letter has been prepared to support the Contamination Assessment and concludes the findings of the Contamination Assessment remain unchanged.</p>	Section 6 and Appendix 18 and 19
State Environmental Planning Policy (Transport and Infrastructure) 2021	
<p>Section 2.48 of the Transport and Infrastructure SEPP requires the consent authority to notify the electricity supply authority and consider any response received, for several works including development carried out immediately adjacent to an electricity substation (2.48(1)(b)(ii)).</p> <p>It is noted an electricity substation is proposed on the western site boundary (identified as a 'kiosk' within the Architectural Plans (Appendix 5)).</p> <p>Accordingly, the SSD will be referred to Endeavour Energy by DPHI as part of the assessment.</p>	Appendix 5

Table 10: Pre-conditions

4.2 Mandatory considerations

The table below outlines the relevant mandatory considerations to exercising the power to grant approval, that are applicable to the project and the relevant section where these matters are addressed within this EIS.

Mandatory consideration	Comment	EIS ref
Environmental Planning and Assessment Act 1979		
Relevant objects of the Act (Section 1.3)	<p>The proposal is consistent with the objects of the Act for the following reasons:</p> <ul style="list-style-type: none"> • It is consistent with approved concept DA and strategic plans and therefore allows for the orderly and economic development of the land • It delivers 130 high quality, affordable dwellings on a strategically located site which will make a substantial contribution to the affordable housing needs of Campbelltown and Greater Sydney • it provides employment opportunities throughout the construction phase of development which will contribute to the local economy • it has been designed in accordance with ESD principles (as outlined within the Sustainability Report Appendix 11) • promotes social welfare through the inclusion of a diverse dwelling mix • it includes a high quality architectural and landscape design which appropriately integrates with the character of the locality 	Appendix 9 and 11
Relevant environmental planning instruments (Section 4.15)	The proposal seeks development consent under Part 4 of the Act. This EIS addresses all matters for consideration under Section 4.15 of the Act.	Appendix 9
Section 4.17 Section 4.24(4)	<p>This SSDA also seeks to modify the existing concept development consent at the site (3944/2021/DA-SW/A) pursuant to Section 4.17(5) and Section 4.24(4) of the EP&A Act. The proposed changes include minor amendments to the:</p> <ul style="list-style-type: none"> • building envelope • prescribed Relative Levels (RLs) <p>These changes are intended to enable necessary structural elements/desired articulation, improve the bulk and scale of the proposal and amenity by creating a useable communal open space area.</p>	

Mandatory consideration	Comment	EIS ref
State Environmental Planning Policy (Sustainable Buildings) 2021	<p>An assessment against the relevant provisions of this SEPP is provided within the Sustainability Report (Appendix 11). In summary, the development has committed to the following:</p> <ul style="list-style-type: none"> • compliance with BASIX Energy, Water and Thermal Comfort Targets (64% Energy, 49% Water and satisfactory thermal) <p>The above demonstrates a strong commitment to sustainability in line with the Council requirements and SEARS requirements and will be further developed during subsequent stages of the project.</p>	Appendix 9 and 11
Campbelltown Local Environmental Plan 2015	<p>Height: the proposal exceeds the 32m height control established by the CLEP 2015 by a maximum of 4.3m when measured using the methodology adopted in <i>Merman Investments Pty Ltd v Woollahra Municipal Council [2021] NSWLEC 1582</i> case law. Notwithstanding, A 30% height bonus is available under Section 18 of the Housing SEPP. Meaning, the maximum permissible building height for the site is 41.6m.</p> <p>The maximum building height proposed is 36.3m and therefore is compliant</p> <p>FSR: No FSR control applies to the site</p> <p>Design excellence: note the site is subject to a design excellence clause. As previously noted, the proposal was reviewed by the Landcom Design Review Panel and State Design Review Panel. Feedback was considered and the design was refined to address the feedback (where capable). Further, as outlined within the Design Report, the proposal specifically achieves design excellence by:</p> <ul style="list-style-type: none"> • establishing a strong architectural identity and sets a precedent for future development • responding to the local context with a robust, human-scaled podium that promotes activity and engagement at street level. 	Appendix 9

Mandatory consideration	Comment	EIS ref
	<ul style="list-style-type: none"> • Providing generous setbacks allowing for substantial landscaping along the street edges, improving pedestrian comfort, visual amenity, privacy, and microclimate. • Providing a centrally located open space enhances permeability across the site and frames • Selecting materials which draw from Country • Not impacting any view corridors 	
Relevant planning agreements or draft planning agreements (Section 4.15)	As outlined in Section 2.5, a planning agreement has been entered into for the MGN precinct.	Appendix 4
Relevant Development control plans (Section 4.15)	<i>Campbelltown Development Control Plan 2015</i> is the DCP relevant to development within the Campbelltown LGA. However, DCP's do not apply to SSD under Section 2.10 of the Planning Systems SEPP and therefore, the controls have not been considered.	Appendix 9
Likely impacts of the development, suitability of the site, the public interest (Section 4.15)	The likely impacts of the development, the suitability of the site and the public interest considerations have been addressed in this application.	Section 6

Table 11: Mandatory considerations

4.3 Contributions

4.3.1 Housing and Productivity Contributions

Housing and Productivity Contributions are not applicable to the proposal as:

- Schedule 2(1)(1)(b)(ii) of the *Environmental Planning and Assessment (Housing and Productivity Contribution) Order 2023* states development which is required to be managed by a registered community housing provider by conditions of development consent prescribed by Section 82 or Section 84 of the EP&A Regulation is exempt from paying Housing and Productivity Contributions
- Section 84 of the EP&A Regulation applies as Landcom will be divesting the site to a registered Community Housing Provider.

4.3.2 Local contributions

On September 2024, Council and the Applicant entered into the Macarthur Gardens North Planning Agreement under Section 7.4 of the EP&A Act.

In accordance with Section 7.1 of the Planning Agreement, the Campbelltown Local Infrastructure Contributions Plan 2018 does not apply to the MGN precinct to the extent of the sum of the contribution values (i.e. including Site R3 subject to this SSD application), see extract below. If the contribution value is exceeded, a suitable condition of consent will be imposed to capture the balance.

"7.1 This Deed excludes the application of s7.11 and s7.12 to the Development to the extent of the sum of the Contribution Values"

Accordingly, no contributions under the *Campbelltown Local Infrastructure Contributions Plan 2018* are to be imposed on any consent issued. Any obligations required to be fulfilled under the Planning Agreement will be completed as relevant to this application prior to construction.

5 Engagement

5.1 Engagement carried out

Details of the key stakeholders identified, and a summary of the consultation undertaken and relevant issues raised to date are set out in the table below.

The engagement program has been conducted in line with the Department of Planning, Housing and Infrastructure’s *Undertaking Engagement Guide: Guidance for State Significant Projects* and complies with the community engagement requirements in the SEARs.

A detailed Community and Stakeholder Engagement Strategy and Engagement Outcomes Report has been prepared by Gyde Consulting and is included as Appendix 22.

A summary of the engagement is provided within the table below.

Stakeholder	Type of engagement	Key matters of discussion
DPHI	Email and meeting	<i>Scoping meeting held prior to issuing of SEARs which has informed the contents of the SSDA package.</i>
Campbellton City Council	Project meeting	<i>Landcom presented the proposal to Council. Council noted no issues of significant concern.</i>
Wider community	In person	<i>20 members of the community attended the pop up in Macarthur Square and provided their feedback.</i>
Connecting with Country working group: WSP, JMP, DKO, Taylor Brammer and Landcom	Initial meeting	<p><i>The following key themes were discussed during the meeting:</i></p> <ul style="list-style-type: none"> <i>Relationship of the site to the surrounding precinct</i> <i>Landscape, native species and deep soil planting is an important part of the project design</i> <i>Opportunities to highlight language, stories, and traditional uses of the land</i> <i>Opportunities to use the corner for welcome and entry into the community, connecting into the rest of the precinct and open space.</i>

Stakeholder	Type of engagement	Key matters of discussion
		<ul style="list-style-type: none"> Highlight the significance of Bow Bowing creek Consider how water is celebrated, captured and used.
	Walk on Country	<p>Key themes:</p> <ul style="list-style-type: none"> Listening, living and learning with Country The role of the creek and the environment Totems and cultural obligations Mobility and land use Language, naming and place identity Environmental efficiency and cultural design

Table 12: Consultation undertaken to date with relevant stakeholders

In addition, engagement with the following design panels was undertaken to gain feedback on the proposed design. A detailed response to each panels feedback is provided within Appendix 6.

Design Panel	Date	Response
Landcom Design Review Panel	13 February 2025	Supported with recommendations
State Design Review Panel	20 May 2025	Supported with recommendations

Table 13: Design Panel feedback

5.2 Community views

The Engagement Outcomes Report (Appendix 22) details how community engagement has been undertaken, including:

- Establishment of a website which provides information on the project and includes contact information for community enquiries
- Conducting a community pop up on 11 June 2025 at Macarthur Square Shopping centre
- Post card distribution to letterbox's (catchment outlined within the Engagement Outcomes Report) which included a link to the project website, invitation to attend the community pop up session, project team contact information and project information
- Meetings were held with key stakeholders including Campbelltown Council and NSW Government agencies to provide information about the development, seek feedback

A total of 951 postcards were distributed on 28 May 2025 to properties in the Macarthur Heights area.

A total of 20 local residents and workers attended to community pop up. The overall sentiment of the proposal was positive with most residents confirming a need for more affordable housing in the area and an awareness of the wider MGN concept approval.

Key issues raised by the community are outlined below and have been addressed within the Connecting with Country Report, Landscape Report, Design Report and Social Impact Assessment:

- connecting with Country
- emphasised the importance of deep soil planting and planting of native species
- provision of affordable housing needs to be supported with the appointment of a community housing provider

5.3 Engagement to be carried out

Landcom will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases by:

- accessibility of the community website as the project moves through the approval process
- continuation of engagement with relevant government agencies on an ongoing basis where relevant to ensure the proposal is progressed
- the SSDA will be subject to a formal community and stakeholder engagement process during which there will be the opportunity for additional feedback and concerns to be provided - this will include public notification for at least 28 days
- following the exhibition of the application, the proponent will consider any submissions made through a Response to Submissions process, at which time any changes or additional mitigations will be considered

6 Assessment and mitigation of impacts

This section provides an assessment of the environmental impacts associated with the proposed affordable housing development. The environmental assessment is based on a number of specialist studies undertaken for the development.

This section provides a summary of the results of the assessment undertaken for the key issues identified by the SEARs.

Proposed mitigation measures are provided at Appendix 21.

6.1 Built form

The proposed architectural designs for the development are included at Appendix 5. In addition, a design report has been prepared and included at Appendix 6.

As shown in the figures below, the proposed development presents as two, 3-9 storey RFBs with a primary frontage to Goldsmith Avenue. The two RFBs evenly distribute GFA across the site with a total FSR of 2.2:1.

The buildings form a u-shape which is split by a central pedestrian access feature. The eastern and western components of the development are 9 storeys which then step down to 3 storeys in the central northern components, facilitating solar access to the central communal open space area.

The architectural design seeks to deliver a calm and elegant urban design outcome through a series of articulated built form elements and carefully selected materials to break down the overall bulk and scale. Importantly, the proposed architectural design produces an improved built form and amenity outcome in comparison to the concept approval design. This is discussed further in Section 6.1.1 below.



Figure 19: Perspective looking south from Goldsmith Avenue (Source: DKO Architecture)



Figure 20: Perspective of communal open space (Source: DKO)

6.1.1 Concept approval

As noted throughout this EIS (specifically within Sections 1.3.1 and 3.2.9), the site is subject to a concept approval.

As shown within the figure below, the proposal has also been carefully designed to largely align with the approved building envelope and intent of the masterplan.

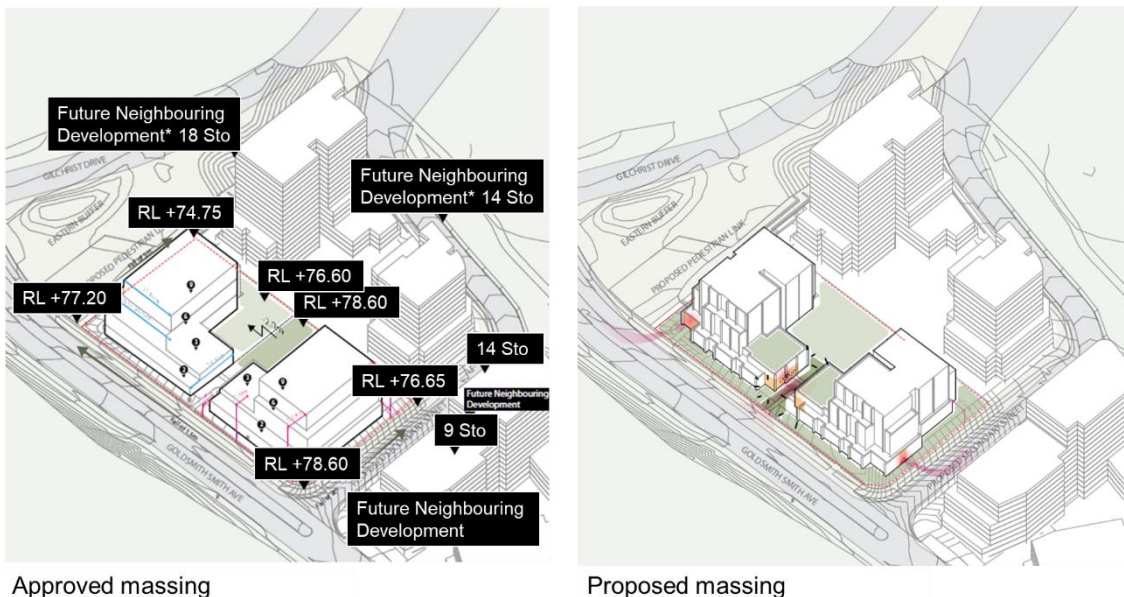


Figure 21: Approved vs proposed massing

However, the concept approval is quite prescriptive in that it sets floor to floor heights and established RLs despite the site requiring excavation works. The approved floor

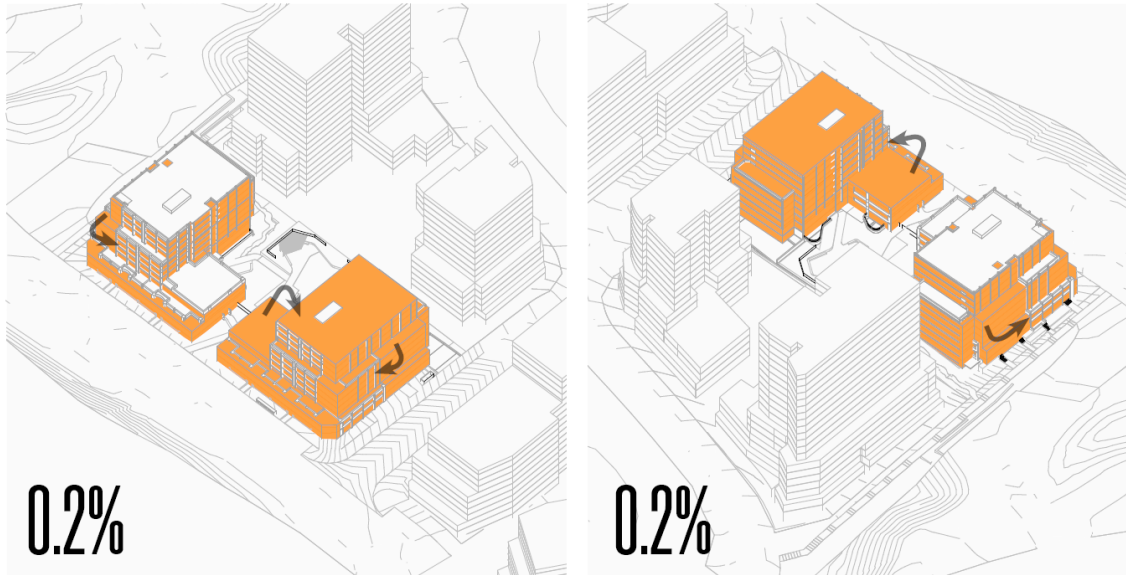
levels resulted in a 2m fall within the ground level communal open space, achieving a sub-optimal outcome.

In addition, the concept approval design also does not achieve ADG solar and cross ventilation compliance as outlined within the Design Report (Appendix 6).

Therefore, to produce the optimal urban design and amenity outcome for the site, minor amendments to the approved concept envelopes and heights (resulting from amending the approved floor levels) are required. The minor amendments are detailed within the table below.

Departure from concept approval	Design Report justification
Envelope	<p><i>Minor façade articulations deviate slightly from the envelope (as shown in white); however, these are minor in volume and clearly illustrated the following diagrams. These have been discussed with Campbelltown Council, who have acknowledged the rigidity of the envelope and expressed no objection to the approach.</i></p> <p><i>The proposal sees a negligible variation of 54m² GBA across both towers, representing only 0.32% of the concept envelope area (~16,778m²).</i></p> <p>It is noted the diagrams mentioned in the quote above are provided in Figure 22 below and the methodology used to calculate the variation is provided within the Design Report (Appendix 6).</p>
Height	<p><i>The proposed development includes a minor deviation in building height compared to the approved Concept DA envelope. This variation is primarily due to updated floor-to-floor (FTF) heights, increasing from 3.1m to 3.15m to align with anticipated NCC 2025 requirements. Additionally, a 3.3m FTF has been adopted on levels with building setbacks to accommodate necessary waterproofing provisions, which were not accounted for in the original concept design.</i></p> <p><i>Further to this, Building B has been slightly elevated to reduce the level difference between the two buildings. This adjustment enables the creation of more usable communal open space and landscaping between the buildings, while also facilitating accessible connections across the site.</i></p>

Table 14: Concept approval departures (Source: DKO)



CONCEPT DA AND PROPOSAL COMPARISON

0.2% deviation in footprint.
Measured in plan for each level.

CONCEPT DA AND PROPOSAL COMPARISON

0.2% deviation in footprint.
Measured in plan for each level.

Figure 22: Proposed envelope with departures identified in white (Source: DKO)

As noted above, these departures are insignificant in terms of the proposals consistency with the overall concept approval and are justifiable as they improve the amenity outcome for future residents whilst having no impacts on surrounding neighbours or public domain.

6.1.2 Setbacks

As noted above, the proposal departs from the approved building envelope in some locations. The extent of the setback departures are identified within the table below. Importantly, they are minor in nature and equivalent to less than 0.32% of the overall footprint. An example of the minor nature of the non-compliances is outlined in orange within the figure below.



Figure 23: Example of setback departure on the northern boundary of Level 3 (Base source: DKO)

Site boundary	Setback control from concept DA	Compliant?
North (frontage to Goldsmith Ave)	<ul style="list-style-type: none"> • Ground Floor (GF): 4.5m (including 1.5m articulation zone within the 4.5m) • L1: 3m (including 1.5m articulation zone within the 3m) • L2-L5: 7.5m (noting allowance is made for private open space on level 3) • L6-L9: 10m 	GF: Yes
		L1: Yes
		L2: Yes
		L3-L9: No 370mm non-compliance in facade articulation (localised)
		L6-L9(roof): 555mm non-compliance in facade articulation (localised)
West (secondary street frontage)	<ul style="list-style-type: none"> • GF-L6: 4.5m (including 1.5m articulation zone for GL and L1) • L7-L9: 7m • Provide direct access from the street for all ground floor apartments. Lobby entrances are to be clearly articulated and accessible from street level. 	GF-L1: No, 150mm non-compliance in facade articulation (localised in 5 brick columns)
		L2-L5: No, 150mm non-compliance in facade articulation (localised)
		L6-L9: Yes
East (Central Park Frontage)	<ul style="list-style-type: none"> • GF-L6: 4.5m (including 1.5m articulation zone for GL and L1) • L7-L9: 7m • Provide direct access from the street for all ground floor apartments. Lobby entrances are to be clearly articulated and accessible from street level. 	GF-L1: No, 150mm non-compliance in facade articulation (localised in 5 brick columns)
		L2-L5: No, 150mm non-compliance in facade articulation (localised)
		L6-L9: Yes
South (Boundary to Site R4 in the MGN precinct)	<ul style="list-style-type: none"> • N/A - no control specified in the setback strategy. <ul style="list-style-type: none"> ○ It is noted the building envelope approved a 6m and 10.5m setback from the southern boundary and this is what is used to assess compliance. 	GF-L3: No, 50mm non-compliance in facade articulation beyond Concept Envelope
East West internal (facing communal open space)	<ul style="list-style-type: none"> • N/A - no control specified in the setback strategy. <ul style="list-style-type: none"> ○ 39m building separation (Concept Envelope) 	GF-L9: No, approx 150mm non-compliance in facade articulation, (localised)

Table 15: Setback compliance (Source: DKO)

Overall, the departures are acceptable on merit as they:

- enable necessary structural elements and articulation

- are minor in nature (equivalent to less than 0.32% of the overall building footprint)
- will have an insignificant impact on the proposal's overall consistency with the approved setbacks and masterplan
- improve the usability of the ground level communal open space
- does not contribute to increased bulk and scale whilst still providing adequate landscaping and screening

6.1.3 Dwelling yield and mix

The two RFBs include a total of 130 dwellings of which 13 are adaptable.

The proposed dwelling mix is outlined within the table below. As detailed within the SIA (Appendix 24), the dwelling mix within the LGA is currently dominated by three bedroom dwellings. Therefore, the proposed unit mix will substantially contribute to housing diversity and affordability within the area by providing a higher proportion of 1 and 2 bedroom dwellings.

Unit Mix	Proposed	Percentage
Studio	0	N/A
1 bedroom	64	50%
2 bedroom	59	45%
3 bedroom	7	5%

Table 16: Proposed unit mix (Source: DKO)

6.1.4 Height

The maximum permissible building height is 41.6m under Section 18 of the Housing SEPP. The site has been excavated in accordance with Stage 1 of the concept approval. Accordingly, the excavated level has been used to measure the height. As shown within the figure below, the maximum proposed height is 36.3m and therefore is compliant with the 41.6m control. It is further noted, that when measured from finished ground level (i.e. what will be viewed from the public domain), the height is a maximum of 32.02m.

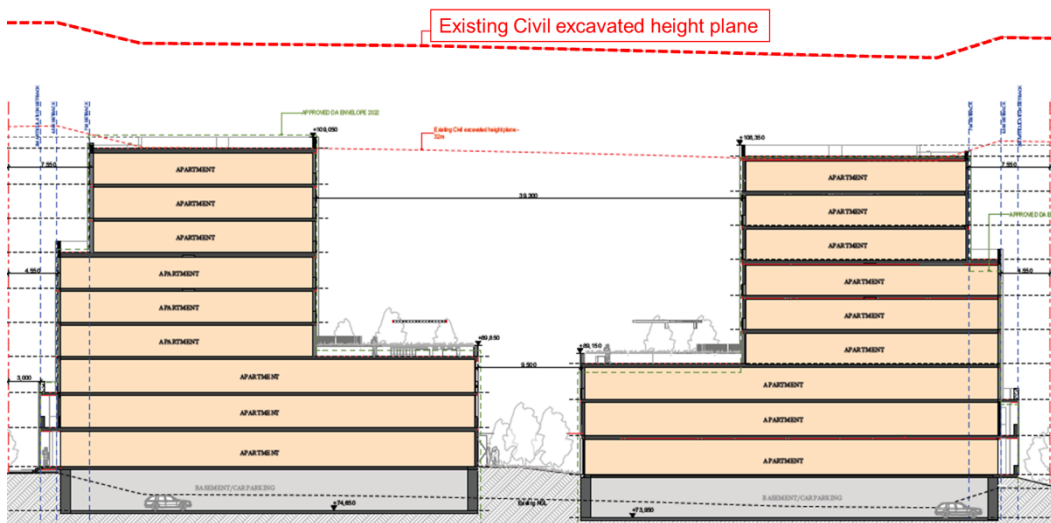


Figure 24: Section Plan (Source: DKO)

Importantly, the proposed built form translates into a 3-9 storey building which is consistent with the concept approval. Furthermore, it also create a transition in height from the proposed future development to the south within the R4 site (outlined in blue dash in the below figure).

As discussed in Section 1.4 of this EIS, the R4 site is the subject of a current Planning Proposal which seeks to deliver a 14-18 storey, high density residential development, given its proximity to the Macarthur Train Station and Macarthur Central Shopping Centre

The subject development seeks to transition height from the R4 site, providing a lower scale as development moves away from the train station and shopping centre. This provides an appropriate urban design response and minimises potential overshadowing to the R4 site to the south.

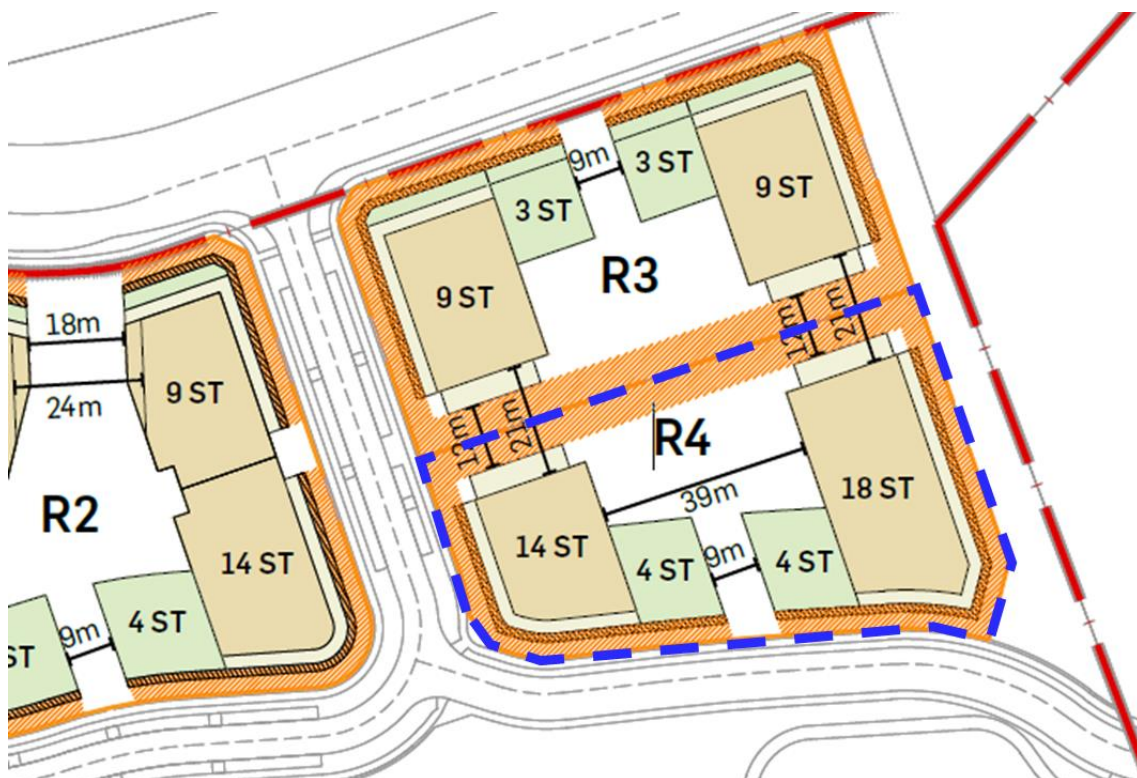


Figure 25: Site R4 future development (Source: Urbis Planning Proposal)

6.1.5 Solar Access

Solar diagrams have been prepared by DKO and are included within the Architectural Plans and Design Report at Appendix 5 and 6 respectively.

Internal solar amenity

The proposal is compliant with ADG requirements as 91/130 (70%) apartments receive 2 hours or more solar access and only 12% (16/130) apartments receive no solar access.

Overshadowing

The overshadowing diagram included within the Architectural Plans (Appendix 5) assesses the impacts of the surrounding sites at 9am, 10am, 11am, 12pm, 12:30pm,

1pm, 1:30pm, 2pm, 2:30pm and 3pm on the 21st June and therefore presents the worst case scenario. It provides a comparison from the approved building envelope under the concept approval. Importantly, there are negligible additional impacts on adjoining properties within the MGN precinct in comparison to what was originally approved. Therefore, the proposal remains an appropriate solar outcome for the site and the wider MGN precinct.

6.1.6 Private and communal open space

Private

As confirmed within Appendix 9 and 5, all 130 dwellings are compliant with the minimum ADG private open space requirements.

Communal

The proposal delivers 1,849m² of the site as communal open space. This is equivalent to 37.7% which exceeds the ADG requirement of 25%.

As shown in the figure below, 1,437m² is provided on ground level and 376m² (188m² each) is provided on Level 3.

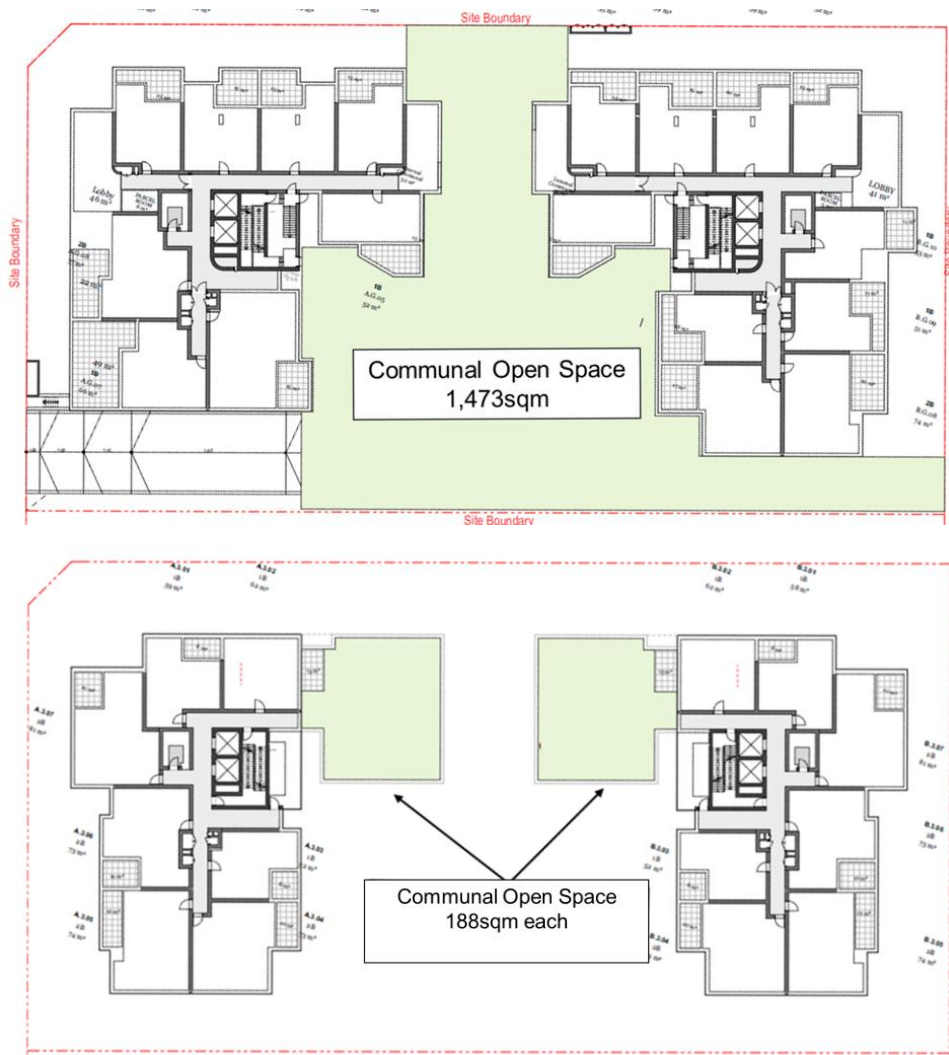


Figure 26: Ground floor and Level 3 communal open space (Source: DKO)

An indicative vision of the ground floor communal open space is shown within the montage below.



Figure 27: Ground floor communal open space (Source: DKO)

6.1.7 Communal residential amenity

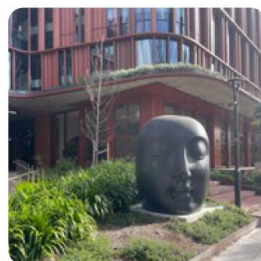
As outlined within the Landscape Report (Appendix 8), the proposed communal residential amenity includes:

- a central, ground floor communal open space area between the two RFBs which includes seating, open turf area sufficient for ball games and picnics, quiet seating areas and a sheltered BBQ (see Figure 28 for aspirational references)
- open space on level 3 of each RFB with seated benches and shelters to allow for social gatherings or working from home opportunities (see Figure 29 for aspirational references)

Based on the above, it is considered that future residents will be provided with a high standard of amenity.



Outdoor meeting spaces



Sculpture



Open Lawn



Community Activation

Figure 28: Ground floor residential amenity inspiration (Source: TaylorBrammer)

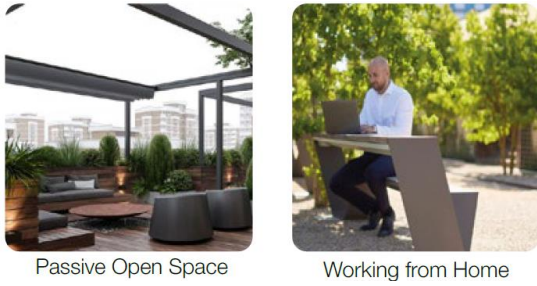


Figure 29: Level 3 residential amenity inspiration (Source: TaylorBrammer)

6.1.8 Material and finishes

The Design Report (Appendix 6) includes a detailed description of the materials and finishes. In summary they include:

- brick
- concrete
- louvre/screens
- glass
- metal
- light weight cladding

The above materials are appropriate and contribute to good design as they have been selected with regarding to connecting with Country principles. Specifically, that the colour and texture have been inspired by the local natural palette (Red Gums and lyrebird), with tonal variation to help break down visual bulk.



Figure 30: Colour palette (Source: DKO)

6.1.9 Connecting with Country

The site is on the land of Dharawal people.

As outlined within the Design Report (Appendix 6), the proposal has been designed with regard to the Connecting with Country feedback from elders and strategies including:

- Caring and healing for Country by increasing space for biodiversity, tree coverage and amenity, minimising upfront and ongoing damage to Country (i.e. ESD) and fostering connection of residents to Country/nature (i.e. through reflective landscape spaces, entry and gathering spaces).
- Restoring and protecting Country's identity through endemic landscape, materiality of landscape and facade reflecting the textures and colours of Country and ensuring the architectural character reflecting nature.
- Cultural education through architectural character reflecting local Aboriginal design, Public Art Strategy with signage and potential incorporation of local language

6.2 Visual impacts

The visual character of the surrounding locality has not substantially changed since approval of the Concept DA in December 2022. Specifically, the site continues to be bound by educational establishments to the north with landscape and road infrastructure to the east.

The key change is that land to the south and west has been cleared and is undergoing redevelopment for roads and infrastructure in accordance with the wider Concept and Stage 1 DA for MGN. This is consistent with the desired future character of the area.

With regard to visual impacts, it is noted the proposed development involves minor departures from the building envelope approved under the Concept DA. However, given the minor nature of these changes, the visual impacts assessed and approved by the Concept DA remain relevant and acceptable. Notwithstanding, a high level assessment is provided below.

The design of the building mitigates issues associated with visual massing, streetscape impact, overshadowing and desired future character through the following design elements:

- The proposed built form is consistent with the approved building envelope delivering a high-quality U-shaped building that ranges in height from 3-9 storeys.
- The proposal incorporates a stepped built form to ensure a seamless integration into the future MGN precinct.
- The materials and finishes are of a high quality and have been select based on Connecting with Country engagement outcomes and consistency with the intended future character of the MGN precinct as colours and textures seamlessly integrate into the surrounding locality. The proposed landscape planting on ground level and level 3 will provide visual interest and soften the setting of the building into the surrounds

As shown within the figures below, the proposed design mitigates potential impacts in respect to bulk and scale, delivering a building that is consistent with the desired future character of the MGN precinct envisaged by the concept approval and Planning Proposal (discussed in Section 1.4 of this EIS).

In addition, the building envelope approved for the site under the Concept DA was considered acceptable from an urban design and visual impact perspective. As noted, the proposal is largely consistent with this envelope and is therefore considered acceptable for the site within its existing and emerging context.



Figure 31: Montage of the future MGN precinct proposed by the Planning Proposal (Source: Urbis)

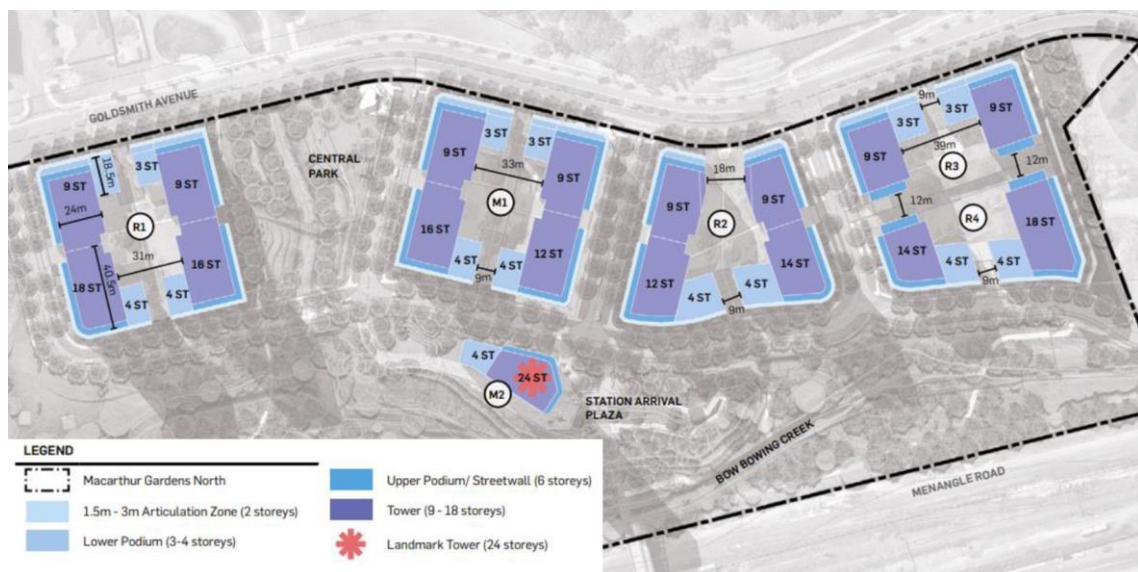


Figure 32: Building heights of the MGN precinct proposed by the Planning Proposal (Source: Urbis)

6.3 Crime Prevention

A Crime Prevention Through Urban Design Report has been prepared (Appendix 33) to assess the proposed design and layout of the development against the requirements of Section 4.15 of the EP&A Act, the Guidelines and the CDCP 2015.

The report proposes series of recommendations. Subject to the implementation of these measures, the proposed development will meet the requirements of CPTED, will activate the site, and improve safety and security in the Macarthur Gardens North Precinct.

6.4 Landscaping

The site is currently vacant and excavated and therefore does not contain any trees or vegetation.

Site landscaping will be undertaken in accordance with the Landscape Report prepared by Taylor Brammer (Appendix 8).

As shown within the figures below, the detailed landscape design will provide a high-quality outcome for the proposed development and will include a:

- series of pathways, seating areas, sculptures, an entry feature and planting on ground floor
- seating and planting at ground and on level 3

The site will have a canopy coverage of 42% and deep soil equivalent to 22% of the site.

The planting design for the project draws inspiration from the local native vegetation communities typical of the western Sydney shale plains and nearby alluvial river flats. The design aims to promote biodiversity, enhance ecological resilience, and create a low-maintenance, climate-appropriate landscape suited to urban living through selecting plants based on local conditions their ability to thrive in compact, community-focused environments. The character of the landscaping includes a combination of native and non native canopy trees, scattered shrubs and dense ground layer.

The diverse landscaping will provide necessary shading through the development in addition to enhancing its presentation to the street and softening the interface between the proposed development and future neighbouring properties along the rear (southern) and western site boundaries as approved by the concept DA.

Overall, the proposal will have a positive impact as the built form and landscape integrate together to create a unique aesthetic character which positively contributes to the amenity and character of the site and surrounding context.



Figure 33: Landscape masterplan (Source: Taylor Brammer)



Figure 34: Landscape sections (Source: Taylor Brammer)

6.5 Soil and water

The EIS is supported by a Geotechnical Report prepared by Douglas Partners (Appendix 16), and Integrated Water Management Plan prepared by Xavier Knight (Appendix 23).

These reports and their findings are discussed further in the subsections below.

6.5.1 Geotechnical

The Geotechnical Report has been prepared to assess the subsurface soil, rock and groundwater conditions across the site to provide geotechnical considerations to advise the project's planning, design and construction.

Douglas Partners has been involved in the MGN development since 2010 and, therefore, has access to detailed and historical geotechnical, environmental and salinity investigations as well as Stage 1 earthworks and construction monitoring.

Further, all earthworks completed on the site prior to 2023 and post January 2024 were conducted under the Stage 1 earthworks supervision of Douglas Partners.

The report was prepared on the basis of a desktop review of the above information and a walkover on site to identify any constraints.

The report concludes from a geotechnical perspective, the site is considered to be suitable and stable for the proposed development subject to the recommended mitigation measures which are detailed within Appendix 21 and 16, i.e. additional work/investigations are required during the construction phases.

6.5.2 Erosion & Sediment Control

The following measures are proposed to mitigate any effects or risk of erosion and sedimentation:

- *Silt fences at the downstream boundary of the construction zone;*
- *Wash down and diversions at temporary vehicle entrances/exits to the construction zone;*
- *Sedimentation basin with outlet control and overflow;*
- *Diversions to prevent upstream runoff entering the construction zone; and*
- *Sandbag sediment traps and geotextile filters to protect existing stormwater pits and inlets*

6.5.3 Earthworks

The site has been excavated in accordance with the Stage 1 concept DA (refer to Section 1.3 and Figure 2). Minor earthworks will be required to establish the ground levels for the building as outlined within the Integrated Water Management Plan (Appendix 23).

A Cut and Fill Plan is provided in Appendix 25. As noted within the Geotechnical Report (Appendix 16), the site is suitable for conventional earthworks and placement of controlled fill would be required to be undertaken in accordance with “*Guidelines on Earthworks for Commercial and Residential Developments*” (AS 3798, 2007).

6.5.4 Stormwater management

Stormwater Management for the site is addressed within Section 3 of the Integrated Water Management Plan prepared by Xavier Knight (Appendix 23).

The MGN precinct has designed and constructed a stormwater system which will service the proposed development on the R3 site. The system includes a rainwater garden and a basin for treatment of runoff, before the water is discharged into Bow Bowing Creek.

As shown within Figure 35 below, the site will be connected to this system via an existing stormwater pit on the south-east corner of the lot. It is noted no on-site detention is required or proposed for the site.

It is further noted the site is located within the Bow Bowing Creek Catchment and therefore development requires Water Sensitive Urban Design methods to be incorporated into the design. As shown within the table below, the proposal meets the targets set by Council:

Pollutant	Council target	Proposed target
reduction of gross pollutants	90%	90%
reduction of total suspended solids	85%	85%
reduction of total phosphorus	60%	65%
reduction of total nitrogen	45%	45%

Table 17: MUSIC results (Source: Xavier Knight)

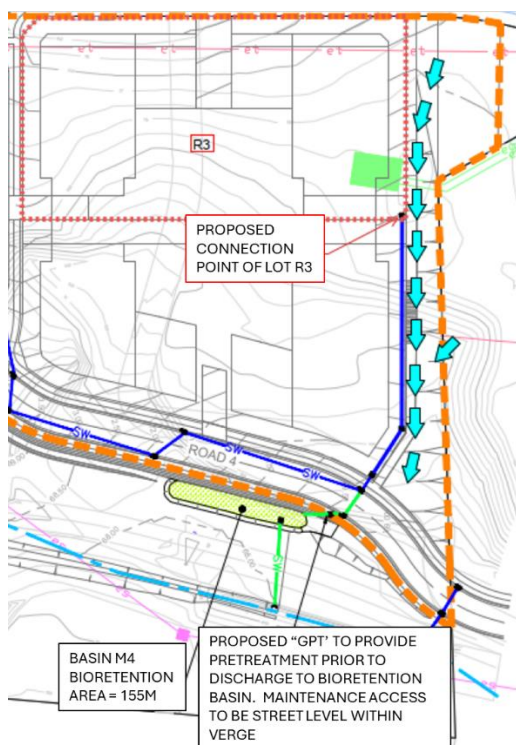


Figure 35: Proposed Basin and GTP (Source: Xavier Knight)

6.6 Flooding

A Flood Compliance Letter has been prepared by J. Wyndham Prince (Appendix 29) as an addendum to the Flood Impact Assessment (FIA) prepared in March 2023 and approved as part of the Concept DA for the broader MGN precinct.

The FIA concluded that the MGN development would not have an adverse impact on either upstream or downstream areas from the site during the 1% AEP storm event.

The compliance letter confirms the FIA remains valid to support the proposed development and updated TUFLOW modelling is not deemed necessary.

Importantly, the Flood Compliance Letter confirms:

- the proposal is compliant with the floor levels required within the CDCP 2023
- the PMF hazard level in the vicinity of the site is H1 (generally safe for people and vehicles) in the developed case flood modelling results and therefore, the proposed development is deemed safe
- the entrance points of the proposed buildings are flood-free during the PMF event
- the site vicinity is subject to shallow overland flow with no significant flood hazard during the PMF event, and Goldsmith Avenue can be used as a flood evacuation route by a future resident of the MGN Precinct

Accordingly, the proposal is considered acceptable from a flood perspective.

6.7 Contamination and remediation

A Contamination Review has been prepared by Douglas Partners at Appendix 18 to support the application and test the validity of two previous reports that have been prepared for the site in recent years:

- JBS&G Pty Ltd (2020) Updated Contamination Assessment, Macarthur Garden North, University of Western Sydney, Campbelltown Campus, Narellan Road, Campbelltown NSW, ref. 58989/130099 (RevA), dated 25 June 2020; and
- Douglas, (2023) Report on Targeted Contamination Investigation, Macarthur Gardens North, Goldsmith Avenue, Campbelltown, Project 34255.35.R.001.Rev0 dated 22 August 2023.

The above reports found the site to be suitable for the proposed development.

The Contamination Review confirms the site has remained relatively unchanged since the completion of Douglas (2023) Report up until commencement of the approved bulk earthworks in early 2024.

Douglas considers that the bulk earthworks DA had sufficient protocols in place to manage the suitability of imported material during the recently completed bulk earthworks. As such, Douglas considers that the conclusions of JBS&G (2020) and Douglas (2023) are still valid and the site is considered suitable for the proposed development.

Douglas considers that if unexpected conditions are encountered during development works, these can be addressed under an unexpected finds protocol.

6.8 Traffic and transport

JMT Consulting have prepared a Transport Impact Assessment (TIA) to assess the traffic and parking outcomes of the proposed development.

The TIA has been prepared in accordance with the following plans and guidelines:

- Australian Standards AS2890 series for parking facilities
- Campbelltown DCP 2015
- The Transport for NSW Guide to Transport Impact Assessment 2024
- Housing SEPP

6.8.1 Road Network

The road network surrounding the site consists of a mix of state and local roads, as summarised in the table below:

Road name	TfNSW classification	Traffic lane's
Goldsmith Avenue	Local road	One lane and a bike lane in each direction
Gilchrist Drive	Regional road	Two lanes in each direction
Menangle Road	Classified state road	One to two lanes in each direction
Narellan Road	Classified state road	Two to three lanes in each direction

Table 18: Surrounding road network

It is noted that on Goldsmith Avenue, there is no street parking on land near the site.

6.8.2 Traffic generation

The anticipated traffic generation for the development has been calculated based on the Transport for NSW Guide to Transport Impact Assessment. Based on the subject site's location with regards to the Macarthur train station and bus interchange, the following peak hour traffic rates have been predicted:

- AM Peak hour: 0.19 trips per apartment
- PM Peak hour: 0.15 trips per apartment

Using those calculations, it is estimated that there will be approximately:

- 25 vehicle trips in the AM peak hour
- 20 vehicle trips in the PM peak hour

The impacts of the development on the traffic network had been previously considered as part of the concept masterplan applying to the MGN Precinct. The proposal is consistent with the scale of development adopted for the modelling used to determine the capacity of the roads in the original application.

Notwithstanding, a study comparing traffic volumes through the Goldsmith Avenue / Gilchrist Drive intersection has been undertaken to confirm that the road network is still suitable for the proposed development. The below table outlines the results:

Intersection	Scenario	Traffic volumes through each section	
		AM Peak Hour (8am-9am)	PM Peak Hour (5pm-6pm)
Goldsmith Avenue / Gilchrist Drive	Base year (2019) traffic data used in Concept Master Plan traffic modelling	2,872	3,376
	April 2025 traffic data	2,329	3,034
	Change compared to 2019 traffic data used for Concept Master Plan	-19%	-10%

Table 19: Traffic data comparison (Source: JMT)

It is concluded that no further traffic analysis or improvement works are required to support the approval of the proposal as the overall traffic volume has reduced.

6.8.3 Access

As indicated by the red arrow in the figure below, vehicular ingress and egress is proposed from an unnamed road along the western boundary. This road has been constructed as part of the Stage 1 approval (3944/2021/DA-SW) and will be dedicated to Council following completion of all Precinct works.

The vehicle access is a single driveway into the basement which facilitates two-way traffic movements. The access point was selected as it maximises the distance away Goldsmith Avenue and minimises the risks of vehicle queuing and impacting the operation of the adjacent road network.

The vehicle access point has been designed in accordance with the design requirements set out in the relevant Australian Standard, namely AS2890.1:2004.

Vehicle swept paths indicating the entry and exit of passenger vehicles from the site are provided in the TIA.



Figure 36: Proposed vehicular access (JMT)

6.8.4 Parking

Car Parking

The Housing SEPP identifies the following car parking rates for affordable housing:

- For dwellings used for affordable housing
 - For each dwelling containing 1 bedroom -- at least 0.4 parking spaces
 - For each dwelling containing 2 bedrooms - at least 0.5 parking spaces
 - For each dwelling containing at least 3 bedrooms - at least 1 parking space

The proposal's compliance with these rates is demonstrated in the table below:

Bedrooms	No. of units	Required	Proposed	Compliant?
1 bedroom	64	25.6	26	Yes
2 bedroom	59	29.5	30	Yes
3 bedroom	7	7	7	Yes

Table 20: Car Parking requirements (Source: JMT)

Accessible Parking

The proposal provides 13 accessible car parking spaces. These spaces are all located within the basement and have been designed in accordance with the relevant Australian Standards. Accessible car parking spaces are 3.8m wide and have clearance heights of 2.5m.

Bicycle Parking

As shown within the table below, bicycle parking has been provided in line with the requirements of the Campbelltown DCP.

CDCP 2015 rate	Required	Proposed
1 space per 5 dwellings	26	26
one space per 12 dwellings	11	11

Table 21: Bicycle Parking Rates

6.8.5 Construction Traffic Management

As part of the TIA, a Preliminary Construction Traffic Management Plan (CTMP) has been included to outline the optimal routes and hours for vehicles associated with construction to operate.

The Construction traffic routes have been optimised to ensure that there is minimal disruption to residential streets or the public transport network. No road closures are anticipated. Construction vehicles will primarily travel along the Hume Motorway and Narellan Road, briefly along Gilchrist Drive before accessing the site from Goldsmith Avenue as seen in the below figure.

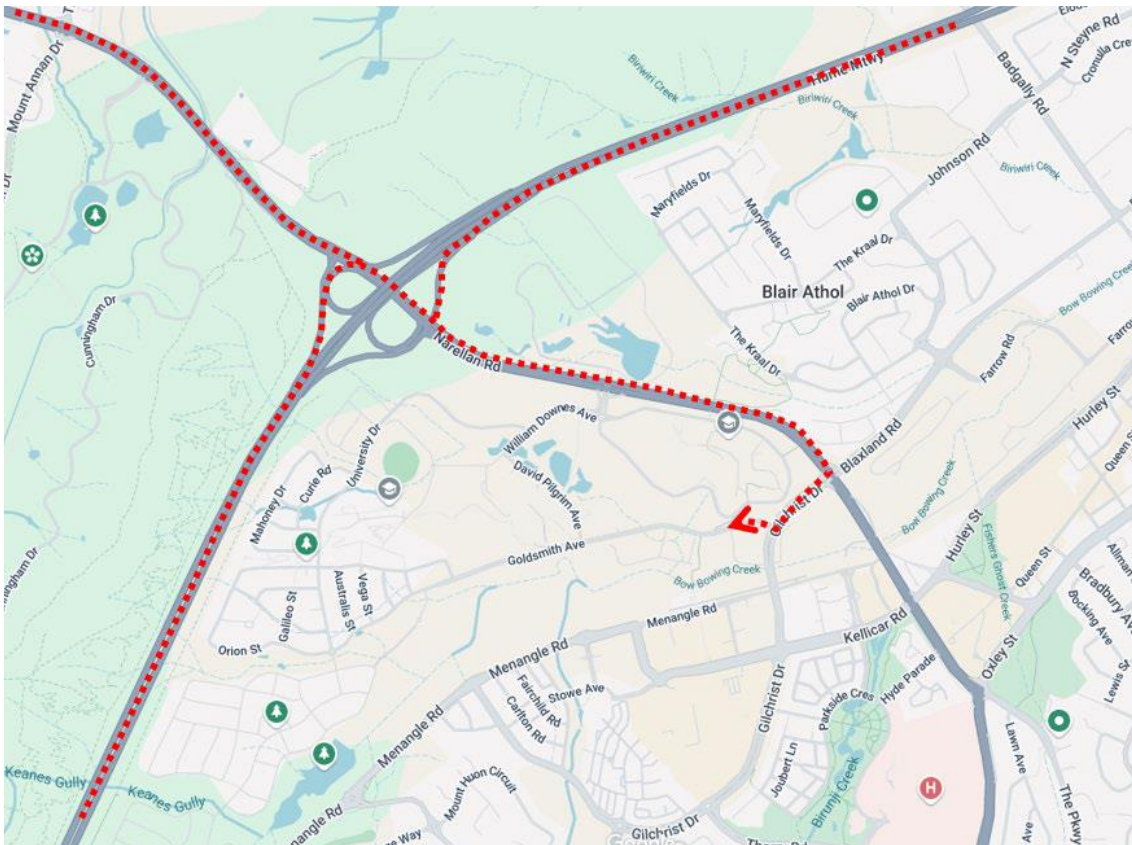


Figure 37: Potential Construction Traffic Routes (Source: JMT)

Construction hours are expected to be:

- Monday to Friday: 7am - 6pm
- Saturday: 8am - 5pm
- Sunday / public holiday: no work

The appointed contractor will be responsible for managing the hours of work.

Construction vehicle volumes on a typical day are anticipated to be approximately 20-30, although the figure will be confirmed within the final CTMP. It is noted that the number of construction vehicles anticipated will be less than that of the operational traffic.

6.8.6 Green Travel Plan

A Preliminary Green Travel Plan (PGTP) is included in the TIA.. The objectives of the PGTP are:

- *Achieve a high modal share for public transport, cycling and walking journeys for residents, staff and visitors of the site;*
- *Reduce private vehicle dependency as a means of access to the site;*
- *Ensure adequate facilities are provided at the site to enable users to travel by sustainable transport modes; and*
- *Raise awareness of, and actively encourage the use of, sustainable transport amongst users.*

The following actions are proposed to implement the PGTP:

- Provide sufficient and easily accessible bicycle parking, including for visitors;
- Ensure cycle parking is clearly visible, or has sufficient signage to direct people to the parking bays;
- Create a map to identify all local cycling routes;
- Supply a communal toolkit for staff with equipment to repair and maintain their bikes;
- Promote participation in cycling events, including 'ride to work day;'
- Identify any residents who may live within walking distance of their workplace;
- Identify what incentives may entice non-walkers to consider a mode shift;
- Develop a highly permeable and safe pedestrian network with high connectivity to nearby facilities;
- Create a map identifying nearby public transport routes;
- Create a map showing car-share locations in the surrounding area; and
- Provide a welcome pack to any new residents to inform them of all the sustainable travel options in the vicinity.

6.9 Social Impact Assessment

A Social Impact Assessment (SIA) has been prepared by Gyde Consulting and is included at Appendix 24.

As outlined in the SIA, housing affordability is a major issue faced by NSW and there is a demonstrated need for more diverse dwelling types and a crucial need for affordable housing to accommodate the projected population growth.

The proposal will result in significant positive social benefits and no significant negative outcomes which would have a material social impact on the community. Specifically, the addition of the 130 new affordable dwellings within the Campbelltown LGA will:

- fulfill demand for affordable housing within an LGA which has a significant number of:
 - households in the very low and low income brackets (4,762 and 1,828 households respectively)
 - residents working in health care and social assistance in comparison to any other industry in the LGA
- diversify dwelling mixes which is crucial in the LGA noting it is currently dominated by three bedroom dwellings
- directly align with Council's LSPS and Housing Strategy which seek to support additional diverse and affordable homes within the LGA
- facilitate housing on a strategically located site adjacent to transport, shopping, business services, education, community facilities, recreational and sporting resources which has a range of social, economic and environmental benefits.

Furthermore, the proposal has broad social, economic and environmental benefits across the community due to its strategic location and volume of dwellings. Based on the abovementioned benefits, and the minimal negative impacts, the SIA supports the SSD.

6.10 Noise and vibration

An Acoustic Assessment Report was prepared by BSE and is attached at Appendix 30. In summary, the report found that the development was suitable for approval from a noise and vibration perspective subject to the proposed mitigation measures and recommendations being implemented.

6.10.1 Existing noise environment

Unattended noise monitoring was undertaken by Renzo Tonin and Associates from three locations across the Macarthur Gardens North Precinct between 31 October and 8 November 2019. This was completed as part of the acoustic report which accompanied the now approved masterplan application. The findings are still considered acceptable for the purpose of establishing baseline conditions given that the site conditions have largely remained the same. The results are as follows:



Figure 38: Location of the Loggers (Source: BSE)

Location	NSW NPI Ambient Assessment - Measured RBL LA90, T			NSW Road Traffic Assessment – Measured LAeq, T	
	Day (Mon-Sat 7am-6pm, Sun 8am-6pm)	Evening (6pm-10pm)	Night (Mon-Sat 10pm-7am, Sun 10pm-8am)	15-hour day (7am-10pm)	9-hour night (10pm-7am)
1 (SW of Site R3)	45	45	38	N/A	N/A
2 (West of Site R3)	51	51	41	63	60
3 (East of Site R3)	46	47	41	63	58

Table 22: Overall Leq ambient levels and Rating Background Levels (RBL) (Source: BSE)

The site is currently surrounded by education, recreational and vacant land, which limits the number of sensitive receivers to the proposal. It is noted the vacant land comprises the MGN precinct and will be developed in the near future, subject to separate approvals.

The existing noise environment is characterised by traffic noise from Gilchrist Drive, Goldsmith Avenue and the railway, and by the ongoing construction noise occurring within the greater MGN Precinct.

6.10.2 Construction noise and vibration

Construction hours will be in accordance with the NSW Interim Guideline for Construction Noise (2009) (IGCN) as outlined below:

- 7am-6pm Monday to Friday
- 8am to 1pm on Saturdays
- No work on Sundays or Public Holidays

The following table outlines the noise criteria at residences applying the IGCN:

Time of Day	Management Level, LAeq (15 min)	How to apply
<p>Recommended Standard Hours:</p> <p>Monday to Friday 7am to 6pm</p> <p>Saturday 8am to 1pm</p> <p>No work on Sundays or public holidays</p>	Noise affected RBL+10dB	<ul style="list-style-type: none"> • The noise affected level represents the point above which there may be some community reaction to noise. • Where the predicted or measured LAeq (15min) is greater than the noise affected level, the proponent should apply all feasible and reasonable work practices to meet the noise affected level. • The proponent should also inform all potentially impacted residents of the nature of works to be carried out, the expected noise levels and duration as well as contact details.
	Highly noise affected 75dB(A)	<ul style="list-style-type: none"> • The highly noise affected level represents the point above which there may be strong community reaction to noise. • Where noise is above this level, the relevant authority (consent, determining, regulatory) may require respite periods by restricting the hours that the very noisy activities can occur, considering: • Times identified by the community when they are less sensitive to noise (such as before and after school for works near schools, or mid-morning or mid-afternoon for works near residences)

Time of Day	Management Level, LAeq (15 min)	How to apply
		<ul style="list-style-type: none"> If the community is prepared to accept longer period of construction in exchange for restrictions on construction times.
Outside recommended standard hours	Noise affected RBL + 5dB	<ul style="list-style-type: none"> A strong justification would typically be required for work outside the recommended standard hours The proponent should apply all feasible and reasonable work practices to meet the noise affected level Where all feasible and reasonable practices have been applied and noise is more than 5dB(A) above the noise affected level, the proponent should negotiate with the community For guidance on negotiating agreements see Section 7.2.2 (NSW Interim Construction Noise Guideline)

Table 23: IGCN noise criteria at residences, using quantitative assessment, Leq (Source: BSE)

Land Use	Management Level, LAeq (15 min) (applies when properties are being used)	How to apply
Classrooms at schools and other educational institutions	Internal noise level 45dB(A)	<ul style="list-style-type: none"> The proponent should consult with noise sensitive land use occupants likely to be affected by noise from the works to schedule the project's work hours to achieve a reasonable noise outcome.
Active recreation areas (characterised by sporting activities and activities which generate their own noise or focus for participants, making them less sensitive to external noise intrusion)	External noise level 65dB(A)	

Table 24: GCN noise criteria at commercial receivers, using quantitative assessment, Leq (Source: BSE)

Construction noise

The Acoustic Assessment Report lists the likely primary sources of noise during the construction phase, and outlines the likely noise emissions from each source as detailed in the below table:

Typical Plant	dBA
Excavation Works	
Bobcat (5t)	93
Truck Delivery	104
Screw Piler	95
Structural Works	
Truck Delivery	104
Concrete Pump	106
Saw	103
Mobile Crane (50t)	95
Angle Grinder	110
Hammer	97
Fit out Works	
Angle Grinder	110
Hammer	97

Table 25: Typical construction plant and sound power levels LwdB(A) (DEFRA) (Source: BSE)

The Report includes a summary of the predicted construction noise levels on the surrounding land uses. The below table identifies the noise sensitive locations and land uses which have been assessed

Receiver	Phase	Predicted Noise Levels, LAeq15min	Noise Affected Management Level – Typical Standard Hours, LAeq15min	Highly Noise Affected Management Level, LAeq15min
1 (Residential, South)	Excavation Works	68	61	75
	Structural Works	77	61	75
	Fit out Works	64	61	75
2 (Residential, West)	Excavation Works	58	60	75
	Structural Works	70	60	75
	Fit out Works	57	60	75
3 (TAFE, North)	Excavation Works	48	55	N/A
	Structural Works	60	55	N/A
	Fit out Works	47	55	N/A
4 (Gilchrist Oval, East)	Excavation Works	37	65	N/A
	Structural Works	45	65	N/A
	Fit out Works	32	65	N/A

Table 26: Likely receivers and the auditory outcomes (Source: BSE)

It is noted that Receivers 1 and 2 are proposed residential buildings within Sites R4 and R2 respectively in the MGN Precinct. Consequently, noise limits for construction would only be applicable in these buildings if they are constructed and occupied before construction of the subject site (R3).

As detailed in the above table, construction noise levels are predicted in the worst case to exceed the Noise Affected Management Levels at receivers 1-3. Therefore, reasonable work controls may need to be implemented to minimise disruption to neighbouring residents and other sensitive receivers. These include

- work times should be organised to minimise the potential for disruption of neighbouring Macarthur Gardens residential (if relevant) and TAFE NSW.
- management measures such as scheduling, and community consultation are practical management measures to minimise the impacts to neighbouring residences.
- it is recommended that best practice measures outlined in AS2436-2010 'Guide to noise and vibration control on construction, demolition and maintenance sites' and recommended best practice procedures in the NSW EPA Interim Guide are used.
- engineering measures such as site boundary hoardings may also be used to minimise these impacts. AS2436-2010 provides a summary of measures and their effectiveness in reducing noise impacts, as shown below in Table 19. As specified by the EPA ICNG (2009) these mitigation measures must be feasible and reasonable options for use.

Construction vibration

Vibration impacts may become an issue to the onsite building where certain machinery is used. Despite the construction methodology not being finalised, high-vibration equipment such as piling rigs, vibratory rollers and jackhammers are not expected to be used, therefore it is considered unlikely that significant vibration will occur.

6.10.3 Predicted Operational Noise Impacts

The communal areas on site are predicted to comply with the relevant Noise Policy for Industry criteria when assessing the impacts against external receivers at Gilchrist Oval and TAFE. However, it is predicted that the operational noise impacts to other residential buildings within the MGN precinct will be non-compliant, particularly to the south on site R4. As a result, the acoustic assessment recommends upgraded façade treatments incorporated into affected apartments when the site specific DA's are lodged.

Recommendations

- Upgraded façade treatments with minimum required sound transmission class (Rw) glazing, wall constructions, and mechanical ventilation to achieve internal noise levels that align with AS2107:2016.
- Amplified speakers should not be used outdoors
- Waste Collection should be undertaken in accordance with that of surrounding developments
- The outdoor ground level communal area should only be used during daytime and evening periods
- All mechanical plant should be designed to comply with relevant noise criteria which is outlined in Section 4.4.2 of the Acoustic Report.

- Further Acoustic design should be undertaken once the location and equipment models of the mechanical plant has been selected and finalised.
- Further assessment of noise and vibrations during the construction phase should be undertaken once the equipment, location and schedule of works is completed.

6.11 Bushfire

A Bushfire Protection Assessment was prepared by Ecological Australia (Appendix 32) for the MGN Precinct as part of the concept approval. The concept approval established building footprints and lot boundaries, which were considered acceptable from a bushfire perspective. Importantly, the proposal aligns with the approved building footprint and site boundaries and therefore this assessment remains relevant.

As shown within the figure below, the bushfire prone vegetation affecting the MGN Precinct is located to the south within the riparian corridor. The vegetation within the corridor is in poor condition and will be revegetated in accordance with the VMP approved as part of the concept.

In all other directions there are managed lands. To the east there is a managed road reserve and sporting fields and to the north and north-west, the land consists of managed gardens, fields and nature strips within Gilchrist Oval and Campbelltown TAFE.

The Bushfire Protection Assessment, which was approved under the Concept DA, proposed Bushfire Protection Measures such as Asset Protection Zones and landscaping management for the MGN Precinct. Subject to these measures, the R3 site is considered to be acceptable from a bushfire risk perspective.

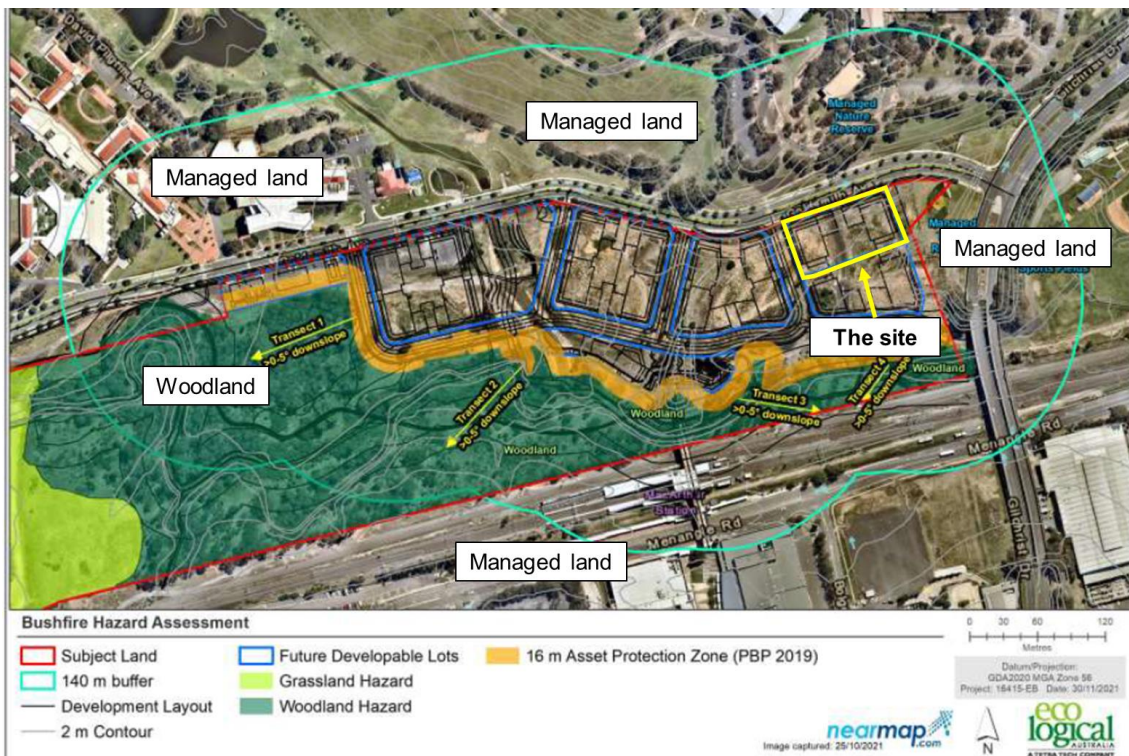


Figure 39: Bushfire Hazard Assessment (Source: Ecological Australia)

6.12 Biodiversity

A BDAR Waiver under Section 7.9(2) of the *Biodiversity Conservation Act 2016* was requested on 31 July 2025. The BDAR waiver is included at Appendix 12. Therefore, no further biodiversity assessment is included in this EIS.

6.13 Waste

A Construction and Demolition Waste Management Plan (CDWMP) and Operational Waste Management Plan (OWMP) has been prepared by Elephants Foot Consulting (Appendix 25 and 26 respectively) and details the quantities and classification of waste streams expected to be generated during construction and operation of the development.

The plans include measures to ensure the development is consistent with the aims and objectives of the following documents:

- *Campbelltown Development Control Plan 2015 – Part 5 Residential Flat Buildings and Mixed-Use Development*
- *NSW Better Practice Guide For Resource Recovery In Residential Developments 2019*
- *NSW Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities 2012*
- *NSW Waste Avoidance and Resource Recovery (WARR) Strategy 2014-2021*
- *NSW Waste Classification Guidelines 2014*
- *Australia's National Waste Policy 2018*

6.13.1 Demolition and construction and demolition waste

Demolition

The CWMP includes a description of waste avoidance measures and how waste will be handled, processed, and disposed of, or re-used or recycled.

It is noted no demolition is proposed as the site has been excavated in accordance with the Stage 1 concept approval and there are no buildings/landscaping on site. However, minor earthworks are required.

The anticipated volume of excavated waste generated is 1,959 tonnes. Approximately 99.8% of this waste can be recycled.

Construction

The types of waste generated during construction is detailed in the figure below. The figures also illustrate how the materials will be managed and estimates the waste which will be diverted from landfill.

Material	Estimated tonnage	Reuse onsite	Recycle	Landfill	Estimated tonnage diverted from landfill
Bricks	85.2	Yes	Yes	No	85.2
Tiles	9.8	No	Yes	No	9.8
Concrete	1155.5	Yes	Yes	No	1155.5
Timber	Unknown	No	Yes	Yes	Unknown
Plasterboard	88.2	No	Yes	Yes	44.1
Metals	2.2	No	Yes	No	2.2
Other	Unknown	Yes	Yes	Yes	Unknown
Total	1340.9				1296.8
Total diversion of waste from landfill (minimum 80%)					98.7%

Table 27: Construction Waste Management (Source: Elephant Foot Consulting)

As outlined above, 99.8% of excavated waste and 98.7% of construction waste will be diverted from landfill - which is compliant with the Council minimum of 80%.

6.13.2 Operational waste

The OWMP provides estimated waste calculations based on generic general waste, recycling and Food Organics and Garden Organics (FOGO) rates. The figure provided below shows the estimated volume of general waste, recycling and FOGO that the proposed development may generate.

Building/ Core	# Units	General Waste Generation Rate (L/unit/week)	Generated General Waste (L/week)	Recycling Generation Rate (L/unit/week)	Generated Recycling (L/week)	FOGO Waste Generation Rate (L/unit/week)	Generated FOGO Waste (L/week)
A	64	110	7,040	48	3,072	25	1600
B	66	110	7,260	48	3,168	25	1650
Total	130		14,300		6,240		3,250
Bins & Collection		General Waste Bin Size (L)	1,100	Recycling Bin Size (L)	1,100	FOGO Waste Bin Size (L)	240
		General Waste Collections per Week	1	Recycling Collections per Week	1	FOGO Waste Collections per Week	1

Building/ Core	# Units	General Waste Generati on Rate (L/unit/w eek)	Generat ed General Waste (L/week)	Recycling Generatio n Rate (L/unit/we ek)	Generat ed Recycli ng (L/week)	FOGO Waste Generation Rate (L/unit/week)	Generat ed FOGO Waste (L/week)
		Total General Waste Bins Required	14	Total Recycling Bins Required	6	Total FOGO Bins Required	14
Bins per Building/Core	Building/ Core	# Bins	Building/C ore	# Bins	Building/C ore	# Bins	
	A	7	A	3	A	7	
	B	7	B	3	B	7	

Table 28: Estimated residential waste (Source: Elephants Foot)

The OWMP also details the waste disposal and collection procedures for the residential component. In short, waste collection will be carried out on-site within the basement.

6.13.3 Waste summary

In summary, the CDWMP and OWMP conclude the proposal will:

- reduce the amount of waste that goes to landfill through effective waste management
- not materially compound regional waste impacts or exceed landfill or recycling facility capacities
- provide appropriate waste management strategies (which have been reproduced in Appendix 21)
- comply with all relevant codes, policies, and guidelines

6.14 Sustainability

A Sustainability Report has been prepared by BSE for the development and is included at Appendix 11.

This report demonstrates the proposal's commitment to sustainability, by providing a responsible development in line with the governing sustainability frameworks and policies. The sustainability measures adopted for the proposal include:

- A 10% reduction in upfront carbon emissions compared to a reference building through:
 - material selection and efficient structural design
 - 100% renewable energy use in common areas, sourced either from on-site solar panels or verified off-site procurement

- Minimum 90% of waste from construction and demolition to be diverted from landfill.
- The building will achieve a weighted NatHERS average of 7.5 stars, no dwelling will be rated below 6 stars.
- The project is proposing to achieve a 20% increase in the minimum compliance requirement for BASIX Energy by making use of energy efficient appliances.
- Minimum 75% of the site will incorporate heat mitigation measures, whether through reflective materials, landscaping or shading.
- A 4 Star Green Star equivalent rating has been achieved on site.
- The site is to be a fully electric, gas-free building.
- All water sources are to meet or exceed high WELS ratings.
- Rainwater harvesting is to be used for irrigation to reduce the use of potable water.
- Similarly, landscape design shall incorporate water sensitive urban design principles to support the move away from potable water sources.

Implementation of the measures above will collectively demonstrate the project's commitment to achieving positive sustainability outcomes, and will create a low-carbon, resource-efficient precinct.

6.15 BCA compliance

A detailed Building Code of Australia (BCA) Regulatory Compliance Report has been undertaken to assess the proposal against the Deemed-To-Satisfy (DtS) provisions of the BCA (Appendix 27).

The BCA assessment concludes that the current design is generally considered to be capable of complying with BCA.

Further assessment of the design will be required as the design develops to ensure compliance as part of the application for construction certificate/complying development certificate.

6.16 Hazards and risk

The site is in a highly urbanised area characterised by commercial and residential developments. The site and broader area are not likely to be affected by above ground dangerous goods storages from the surrounding developments. Similarly, it is understood there are no underground high-pressure dangerous goods pipelines in the vicinity of the site. Accordingly, a Preliminary Hazard Analysis is not warranted and no further assessment is required.

6.17 Heritage

6.17.1 European Heritage

There is no built heritage on the site, or in proximity to the site. As such, an assessment against built heritage was not considered necessary for the purpose of this application it was not a required of the SEARs.

6.17.2 Aboriginal Cultural Heritage

A letter of Aboriginal Heritage Advice has been prepared by Niche Environment and Heritage to address the Aboriginal Cultural Heritage relating to the site (Appendix 28).

As shown within the figure below, there are three AHIMS sites (reference numbers: 52-2-4437, 52-2-4438 and 52-2-4439 located within this MGN precinct). These sites were identified as part of the technical heritage investigation prepared to support the concept and stage 1 DA (DA1571/2015/DA-CW). An AHIP was obtained in 2019 to protect these items and is in effect until 2 May 2034.

Importantly, these sites are substantially separated from the site subject to this SSD (Site R3). Notwithstanding, the letter of Aboriginal Heritage Advice includes a number of recommendations, which have been included within the mitigation measures table in Appendix 21.



Figure 40: Location of AHIMS sites (Source: Niche)

6.18 Pedestrian Wind Environment

A Pedestrian Wind Environment Statement (PWES) was prepared by Windtech to accompany the SSD (Appendix 17). An assessment was conducted against the local wind climate and the characteristics of the proposed development.

Overall, the PWES found that the development is suitable for approval against the relevant wind criteria. There will be some effects on the surrounding pedestrian wind environment, but it is unlikely that the development will exceed the relevant criteria.

The PWES recommends a range of measures to ensure that the development will achieve an acceptable wind environment, including:

- For ground level open space

- Densely foliating trees and other planting that has been indicated in the landscape concept are included in the final design
- For private balconies and communal open spaces
 - Corner balconies on the north-eastern and north-western side of the development between levels 2-8 should have full height end screens along one of the exposed perimeter edges
 - Corner balconies on the south-eastern and south-western side of the development between levels 6-8 should have full height end screens along one of the exposed perimeter edges
 - Retain the proposed balustrades and full height intertenancy screens along the perimeter edges
- For level 3 communal open spaces
 - Include 1.5m permeable balustrades along the entire exposed perimeter of the communal open spaces
 - Consider the including features such as free-standing screens or densely foliating evergreen vegetation within the spaces
 - Consider locating outdoor seating areas away from the corners of the building

6.19 Solar Light Reflectivity

A Solar Light Reflectivity Study was prepared by Windtech Consultants (Appendix 10) to determine the effects of any potential solar glare of the proposed development and provide recommendations to limit any impacts.

This report identifies possible adverse reflected solar glare conditions affecting motorists, pedestrians, and to occupants of neighbouring buildings and, where required, makes recommendations to mitigate any potentially adverse effects. This study assesses compliance with the controls for solar glare from the Housing SEPP, ADG and the CDCP 2015.

The report includes the following recommendations:

- *Retention of the proposed densely foliating street trees along the Goldsmith Avenue frontage of the site as indicated in the landscape drawings. They are to be of an evergreen species to ensure their effectiveness in wind mitigation throughout the year.*
- *Inclusion of external vertical louvres over two east facing windows on the east building throughout levels 3-8*
- *All glazing on the external façade should have a maximum normal specular reflectance of visible light of 20%*

The Solar Light Reflectivity Study concludes that subject to the incorporation of the abovementioned recommendations, the subject development will not cause adverse solar glare.

6.20 Structural Feasibility

The Structural Engineering Report has been prepared by Xavier Knight and is included at Appendix 7. The architectural design has been prepared with regard to the structural advice provided by Xavier Knight and is compliant with the relevant Australian Standards.

6.21 Fire Engineering

The Fire Engineering Statement has been prepared by Holmes and is included at Appendix 34. The Statement considers that performance based fire engineering can be utilised to demonstrate compliance with the Performance Requirements of the BCA without substantial changes to the current design. Additional non-compliances may be identified as the design is further developed, however it is considered that there are no significant issues that would substantially affect the building layout.

7 Project justification

The section provides a justification for the proposed development with consideration of applicable strategic and statutory planning provisions, market demands and the economic benefits that may be gained if the proposal was to proceed. This section also provides an analysis of the proposal with regard to economic, environmental and social impacts, and principles of ESD.

It assesses the potential benefits and impacts of the proposed development, taking into consideration the findings in the detailed assessments, stakeholder views and compliance with the relevant controls and policies.

The net social, economic and environmental impacts and benefits are further discussed in the following sections.

7.1 Design justification

The proposal is structured around the concepts of affordability, amenity, sustainability and accessibility.

Key design rationale for the development includes:

- provision of 130 affordable housing units, contributing to housing affordability and diversity in the area
- a building envelope which is largely consistent with the concept approval, which assessed bulk, scale and visual impacts and deemed them acceptable
- consistency with the site's R4 High Density Residential zoning
- achieves compliance with the ADG including cross ventilation and deep soil requirements
- provision of significant residential amenity in the form of communal open space on ground level and level 3
- embracement of designing with Country principles

As discussed in Section 1, a concept and stage 1 DA applying to the site were approved on 14 December 2022.

Importantly, the proposal seeks to further improve the design and has in some areas, reduced the overall bulk and scale. Therefore, the design is justifiable and provides the best-case urban design outcome for the site with consideration of the parameters of the approved concept design.

7.2 Strategic justification

As demonstrated in Appendix 3, the proposed development meets the objectives and directions outlined in the relevant strategic policy framework for the site, locality and broader region. In particular, the proposal meets the objectives of the:

- **National Housing Accord 2022** – The proposal aligns with the Accord by assisting with the delivery of housing to meet the target of delivering 1 million new homes by 2029 and 377,000 new homes in NSW by 2029
- **Greater Sydney Region Plan** – The proposal satisfies the 4 key themes of the region plan, including Infrastructure and Collaboration, Livability, Productivity and Sustainability.
- **Western Parkland City District Plan** – The proposal satisfies a number of planning priorities particularly in relation to providing new affordable homes with opportunities for social connection in walkable, human scale, fine grain neighbourhoods.
- **Greater Macarthur 2040 (Interim Plan 2018)** – **The proposal is consistent with the key principles outlined by the plan in relation to place, landscape, built form and land use.**
- **Greater Macarthur Growth Area Structure Plan 2022 and Guide** - **The proposal satisfies the principles of the plan by** accommodating Sydney's growing population through sustainable urban development.
- **Future Transport Strategy 2056 (2022 Version)** - The proposal contributes to a more connected and sustainable urban environment and supports the strategy's goals of enhancing liveability and accessibility.
- **Staying Ahead: NSW State Infrastructure Strategy 2022-2042** - The proposal satisfies priorities of the strategy as it *delivers housing in proximity to existing and planned infrastructure.*
- **Glenfield to Macarthur Urban Renewal Corridor Strategy** - The proposal aligns with the future vision and character of the precinct.
- **Macarthur Precinct Plan** - The proposal aligns with the key aspects of the vision for the precinct, particularly housing, built form, open space and public domain and movement.
- **Campbelltown Local Strategic Planning Statement** - The proposal is consistent with the objectives of the Campbelltown LSPS, delivering housing in a well located area.
- **Campbelltown Local Housing Strategy 2041** - The proposal is consistent with the needs and priorities of the housing strategy, specifically by contributing to the housing diversity and addressing the current housing shortfall in the area.

7.3 Statutory justification

An assessment of the proposal against the relevant statutory planning considerations is summarised in Appendix 4 and in Section 4 of this EIS.

The proposal is consistent with the objects of the EP&A Act, relevant SEPPs and CDCP 2015 controls which relate to the site and proposal.

The proposal is permissible with consent under the CDCP 2015 and the Housing SEPP and is largely compliant with the relevant controls applying to the site.

7.4 Community views

Extensive community engagement has been undertaken as part of the pre-lodgement process for this application in accordance with the SEARs.

A detailed summary of the engagement strategies and outcomes is provided in Section 5.

No significant concerns were raised during the engagement which is likely to be indicative of the community's support of the proposal which seeks to deliver significant affordable housing on a strategically located site that benefits from an existing concept and stage 1 approval.

7.5 Social, economic and environmental justification

A summary of the social, economic and environmental justification is provided in the sections below. It is considered that the combination of each of these aspects justifies the need for the proposed development at the site.

7.5.1 Social

Based on the findings of the Social Impact Assessment (Appendix 24), the proposed development is expected to have a positive social impact on the local community, as a result of the proposed residential development comprising 100% affordable housing.

Furthermore, the proposed development would provide significant social benefits, including:

- fulfill demand for affordable housing within an LGA which has a significant number of:
 - households in the very low and low income brackets (4,762 and 1,828 households respectively)
 - residents working in health care and social assistance in comparison to any other industry in the LGA
- diversify dwelling mixes which is crucial in the LGA noting it is currently dominated by three bedroom dwellings
- directly align with Council's LSPS and Housing Strategy which seeks to support additional diverse and affordable homes within the LGA
- facilitate housing on a strategically located site adjacent to transport, shopping, business services, education, community facilities, recreational and sporting resources which has a range of social, economic and environmental benefits.

Therefore, the proposal has broad social, economic and environmental benefits across the community due to its strategic location and volume of dwellings. Based on the abovementioned benefits, and the minimal negative impacts, the SIA supports the SSD.

7.5.2 Economic

The proposed development involves a significant capital investment of \$103,491,570.60 million in construction and associated costs.

The financial investment will facilitate the future development of a residential flat building consisting of 100% affordable housing, providing approximately 17,594 sqm of residential accommodation.

The development would also support up to 127 jobs during construction.

7.5.3 Environmental

Under the National Strategy for Ecologically Sustainable Development (1992), ESD is defined as, 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased.'

The *Environmental Planning and Assessment Act 1979* utilises the definition of ESD from Part 3, Clause 6(2) of the *Protection of the Environment Administration Act 1991*, wherein ESD can be achieved through the implementation of a set of principles and programs.

The proposal has been assessed under these principles in the below sections and additionally, under the accompanying Sustainability Report at Appendix 11.

The precautionary principle

The precautionary principle states that if there are threats of serious or irreversible environmental damage, the lack of full scientific certainty should not be used as a reason for postponing measures to prevent said damage.

Detailed investigations relating to the geological, environmental, engineering and social aspects of the proposal have been undertaken with the aim to produce an optimal project design. The development of the site as outlined in this EIS and supporting technical assessments, provides the current optimised proposal, which takes into consideration all physical, environmental, social, cultural heritage and economic aspects which are required to be addressed.

The information supporting this proposal demonstrates that there is sufficient certainty of the environmental impacts associated with the proposal and that these impacts are acceptable and can be mitigated.

Inter-generational equity

Inter-generational equity refers to the principle that the current generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations.

The proposed development has been assessed and mitigation measures are recommended at Appendix 21 of this report. It is considered the principle of inter-generational equity is achieved as potential environmental impacts of the development will be avoided, minimised or mitigated.

Conservation of biological diversity and maintenance of ecological values

The third principle of ESD states that the conservation of biological diversity and ecological integrity should be a fundamental consideration in development applications.

As previously discussed, the site is fully cleared and does not contain any vegetation or areas of high biodiversity value. Importantly, once landscaped, the proposed canopy coverage will be equivalent to 42% of the site to improve ecological values on the site.

Therefore, the proposal will not have any adverse impacts in terms of diversity and ecological values