

Formal Planning-Law Submission Opposing SSD-93539963 — 28 Cordeaux Street, Campbelltown

To: NSW Department of Planning, Housing and Infrastructure **Re:** State Significant Development — Mixed Use Development, 28 Cordeaux Street, Campbelltown (SSD-93539963)
From: **Resident, Villa 5, 42–44 Cordeaux Street, Campbelltown** Member of St Peter's Anglican Church (Heritage Item) Staff Member at St Peter's Anglican College (Sensitive Land Use)

1. Introduction and Standing

I lodge this submission pursuant to the public exhibition requirements under the *Environmental Planning and Assessment Act 1979* (EP&A Act).

My standing is significant due to my proximity and direct relationship to affected land uses:

- I reside at **Villa 5, 42–44 Cordeaux Street**, a neighbouring dwelling on the same side of the street, placing me within the immediate construction and operational impact zone.
- I am a member of **St Peter's Anglican Church**, a heritage-listed item that shares a boundary line with the development site.
- I am a staff member at **St Peter's Anglican College**, a sensitive land use directly affected by traffic, safety, noise, overshadowing, and construction impacts.

These roles provide me with direct, site-specific knowledge relevant to assessment under s.4.15 of the EP&A Act.

2. Statutory Assessment Framework

Under **s.4.15(1)** of the EP&A Act, the consent authority must consider:

- (a)(i) provisions of any environmental planning instrument
- (b) likely impacts of the development
- (c) suitability of the site
- (d) submissions made in accordance with the Act
- (e) the public interest

This submission demonstrates that the proposal fails multiple mandatory assessment tests.

3. Heritage Impact — St Peter's Anglican Church (s.4.15(1)(b), (c), (e))

St Peter's Anglican Church is a heritage-listed item under the Campbelltown LEP. The proposed 14-storey tower is inconsistent with heritage conservation objectives under:

- Campbelltown LEP 2015 — Clause 5.10
- Campbelltown DCP — Heritage Chapter
- Burra Charter principles

Key failures include:

- **Excessive height and bulk** dominating the heritage item
- **Inadequate transition** between heritage and high-rise built form

- **Poor integration** with the existing low-rise streetscape
- **Loss of visual prominence** of the church within its historic setting
- **Insufficient justification** for a tower of this scale adjacent to a heritage item

The EIS does not demonstrate that the proposal conserves the significance of the heritage item as required under the LEP.

3.1 St Peter's Anglican Church is not only a heritage-listed building — it is a cultural anchor for Indigenous families in Campbelltown through the Campbelltown Indigenous Church. It provides:

- A safe spiritual space
- Cultural connection and community identity
- Pastoral care and support
- Intergenerational continuity
- A place for Indigenous ceremonies, gatherings, and healing

The church's setting, visibility, and peaceful environment are essential to its cultural role.

The proposed 14-storey tower threatens this significance.

4. Boundary-Line Heritage Construction Impacts (Critical Planning Concern)

Because St Peter's Anglican Church shares a boundary line with the development site, construction impacts are significantly intensified and pose unacceptable risks under s.4.15(1)(b).

4.1 Structural Risk to Heritage Fabric

Boundary-line excavation for three basement levels creates high-risk conditions including:

- Ground vibration from piling and heavy machinery
- Settlement or subsidence affecting heritage foundations
- Micro-cracking of brickwork, sandstone, stained glass, and mortar
- Structural movement in heritage walls and timber frames

No compliant heritage vibration impact assessment has been provided.

4.2 Damage to Heritage Curtilage

Construction directly intrudes into the church's curtilage, causing:

- Loss of visual integrity
- Construction hoarding blocking views of the church
- Heavy machinery operating within metres of heritage walls
- Dust deposition accelerating weathering of heritage materials

Curtilage protection is a statutory requirement under LEP Clause 5.10.

4.3 Vibration Impacts

Heritage buildings are highly vulnerable to vibration. Boundary-line construction may cause:

- Cracking of brittle historic materials
- Loosening of mortar joints
- Damage to stained glass windows
- Distortion of timber frames

No vibration monitoring plan has been provided.

4.4 Noise Impacts on Church Operations

Prolonged construction noise will disrupt:

- Worship services
- Funerals, weddings, baptisms
- Choir rehearsals and community programs
- Pastoral care activities

4.5 Archaeological Risk

Boundary-line excavation may disturb:

- Burials
- Foundations of earlier church structures
- Cultural artefacts

This triggers obligations under the **Heritage Act 1977**.

4.6 Failure to Provide Required Heritage Protections

The EIS lacks:

- A heritage-specific dilapidation report
- A vibration monitoring plan
- A curtilage impact assessment
- A heritage construction management plan

These omissions are significant planning failures.

5. Impacts on St Peter's Anglican College — Sensitive Land Use (s.4.15(1)(b))

The proposal will generate unacceptable impacts on student safety, school operations, and learning environments. The tower also presents child protection concerns through exposure to unknown adults

5.1 Traffic impacts on school drop-off/pick-up

The development will exacerbate existing congestion on Cordeaux Street, contrary to RMS guidelines and DCP controls.

5.2 Pedestrian safety

Increased vehicle movements and construction activity will create unsafe conditions for students walking between school, church, bus stops, and nearby streets.

5.3 Construction impacts — prolonged noise, vibration, disruption

Construction of a 14-storey tower will result in:

- **Prolonged noise** throughout the school day
- **Vibration** affecting classrooms and specialist learning spaces
- **Disruption** to outdoor learning spaces, playgrounds, assemblies

5.4 Overshadowing of school grounds

The tower will reduce:

- **Sunlight access**
- **Outdoor learning amenity**
- **Comfort and safety during breaks**

5.5 Increased congestion on Cordeaux Street

The proposal will impede school operations, bus access, emergency vehicle movement, and residential access.

5.6 Exposure to Unknown Adults

Construction sites bring:

- Contractors
- Subcontractors
- Delivery drivers
- Temporary labourers
- Future residents

This increases the number of unknown adults in close proximity to children, raising concerns about:

- **Unsupervised contact**
- **Inappropriate interactions**
- **Lack of Working With Children Checks (WWCC)**

Schools and churches must minimise unsupervised adult-child proximity.

5.7 impact on St Peters Heart Special Needs Education Unit

The Acoustic Report states:

“Construction activities... have the potential to generate... ground vibration... The greatest impacts are expected during demolition, excavation, rock breaking (if required), piling (if required).”

The Acoustic report also states;

“The nearest potentially affected sensitive receivers comprise... St Peter’s Anglican Grammar School.” It confirms that demolition, excavation, rock-breaking, piling and heavy machinery will generate high-intensity noise. High-needs students are disproportionately affected by vibration.

Vibration can cause:

- Fear and distress
- Sensory overload
- Disorientation
- Disruption to medical equipment
- Structural movement affecting classrooms

Impacts include:

- Severe disruption to classroom learning
- Distress, panic and behavioural escalation in high-needs students
- Reduced ability for teachers to supervise and communicate
- Interference with therapy, intervention and support programs
- Increased need for crisis management and behavioural de-escalation

For St Peter’s Heart students, sudden loud noises can trigger:

- Meltdowns
- Flight behaviour (running away)
- Self-harm
- Trauma responses

This is a child-protection concern, not merely an amenity issue.

6. Residential Amenity Impacts — Villa 5, 42–44 Cordeaux Street (s.4.15(1)(b))

As a resident neighbouring the development site on the same side of Cordeaux Street, I will experience direct construction and operational impacts, including:

- **Prolonged construction noise**
- **Vibration impacts** affecting building structure and amenity
- **Dust and particulate deposition**
- **Traffic disruption** from construction vehicles
- **Reduced access** to my driveway and property
- **Safety risks** from heavy machinery and narrowed pedestrian paths
- **Loss of on-street parking**

- **Overshadowing and visual bulk** from the 14-storey tower
- **Loss of privacy** from elevated balconies
- **Permanent change to neighbourhood character**

The EIS does not adequately assess these direct impacts on adjacent residential properties.

7. Overdevelopment and Urban Design Failures (s.4.15(1)(b), (c), (e))

The proposal constitutes overdevelopment and fails key urban design principles:

- **Excessive height and bulk**
- **Inadequate transition** between heritage and residential areas
- **Poor integration** with the existing streetscape
- **Insufficient justification** for a tower of this scale

The site is not suitable for a 14-storey tower.

8. Public Interest (s.4.15(1)(e))

The proposal is not in the public interest because it:

The proposal is **not in the public interest** because it:

- Undermines Indigenous cultural heritage
- Damages a heritage-listed church
- Disrupts community cohesion
- Compromises student safety
- Reduces access to safe cultural spaces
- Conflicts with local planning controls
- Introduces unjustified high-density development into a sensitive precinct

9. Conclusion

For the reasons outlined — including boundary-line heritage construction impacts, heritage conservation failures, school safety concerns, traffic and amenity impacts, and significant overdevelopment — the proposal fails multiple statutory tests under s.4.15 of the EP&A Act.

I respectfully request that the Department:

- Refuse the application
- Find and alternate use for the space