

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 8:38:43 PM

---

Submitted on Sat, 24/08/2024 - 20:38

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

John

### **Last name**

Valentino

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Chester Hill

### **Please provide your view on the project**

I object to it

### **Submission**

Dear DPHI,

I am writing to formally object to the Bankstown Rezoning Masterplan as proposed. While I recognize the importance of urban renewal and redevelopment, I am concerned that the plan, in its current form, does not adequately address the potential for increased density, especially in light of the recent confirmation of the new Bankstown Hospital site and the nearby university. This oversight undermines the plan's ability to fully realize the area's growth potential and meet the urgent housing needs of the community.

The current Masterplan significantly underestimates the benefits and necessity of higher density development around the newly established Bankstown Hospital and the adjacent university. These locations are critical hubs for growth, and their potential is not being fully utilized under the current density provisions.

The surrounding area, which is currently characterized by low-rise walk-up apartments, presents constraints on further redevelopment. By not addressing these constraints with increased density, the Masterplan limits the potential to meet the growing demand for housing and does not fully capitalize on the strategic advantages offered by the hospital and university.

Given the significant investment in the new Bankstown Hospital and the university, it is essential to enhance the density provisions in the Masterplan. The presence of these key institutions will attract a substantial number of workers, students, and residents, which will drive the need for increased housing.

Higher density development in these areas would not only accommodate this anticipated demand but also support local businesses and services, creating a vibrant, economically sustainable community. It is vital that the Masterplan reflects this by incorporating higher density provisions around these strategic sites.

The housing shortage in the Bankstown area is a pressing issue that requires immediate attention. The current Masterplan does not adequately address this shortage, particularly in light of the new hospital and university. By increasing density around these key sites, the Masterplan can provide a greater number of housing units, contribute to a more balanced supply-demand dynamic, and improve housing affordability and availability in the region.

Kind Regards,  
John Valentino

, Chester Hill

**I agree to the above statement**  
Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 9:14:40 PM

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Submitted on Sat, 24/08/2024 - 21:14

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Kathleen

**Last name**

Gray

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Bankstown

**Please provide your view on the project**

I object to it

**Submission**

Dear DPHI

I am writing to express my concern regarding the Bankstown TOD Masterplan. While I acknowledge and appreciate the efforts to enhance the area, I believe the current plan does not adequately address the potential for increased density, particularly in proximity to the new hospital.

The introduction of a new hospital is a significant development, and it presents a unique opportunity to create a vibrant and well-connected community. Given the hospital's role as a major regional facility, the surrounding area should support higher-density residential and mixed-use developments. This would not only cater to the increased demand for housing but also contribute to the local economy and provide essential amenities within walking distance.

Currently, the proposed density in the masterplan appears insufficient to fully leverage the benefits of the hospital's presence. Increasing the allowable density around the hospital could:

1. Provide more housing options for healthcare professionals and residents.
2. Enhance public transport viability and reduce reliance on private vehicles.
3. Stimulate local businesses and services.
4. Promote a more sustainable and dynamic urban environment.

I urge the Department to consider a revised masterplan that includes a higher density uplift in the vicinity of the new hospital. This adjustment would align with broader strategic goals for urban development and sustainability, benefiting both current and future residents.

Thank you for considering my input on this important matter.

Regards,  
Kathleen Gray

[REDACTED], Bankstown

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 9:41:52 PM

---

Submitted on Sat, 24/08/2024 - 21:41

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Thach

**Last name**

TanTien

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Bankstown

**Please provide your view on the project**

I object to it

**Submission**

Attention DPHI,

I wish to object the project, as after reviewing the masterplan, it is evident that the proposed density is insufficient to address the growing needs of our community and to fully capitalize on the investment in the new hospital infrastructure.

The new hospital represents a significant and transformative development for Bankstown, bringing with it the promise of improved healthcare services and economic growth.

However, the current density provisions in the masterplan do not align with the potential benefits and opportunities that this landmark project presents. In particular, the limited density around the hospital area fails to leverage the hospital's potential to stimulate surrounding development and support a thriving, integrated community.

Higher density would ensure that the hospital and its associated services have a sufficient population base to support their long-term viability and operational efficiency.

Higher density can facilitate the creation of vibrant, mixed-use communities, enhancing the overall quality of life for residents.

I urge the Department of Planning to reconsider the density provisions in the masterplan and to implement a more ambitious approach around the new hospital precinct.

This adjustment would align with the strategic vision for Bankstown and ensure that the full potential of the new hospital development is realized.

Thank you for considering my views on this important matter.

Thach TanTien



Bankstown

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 9:45:34 PM

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Submitted on Sat, 24/08/2024 - 21:45

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Kamala

### **Last name**

Tran

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I object to it

### **Submission**

To Whom It May Concern,

I am writing to formally object to the proposed rezoning of the Bankstown TOD area. After a thorough analysis of the current proposal and the recently confirmed site for the new Bankstown Hospital, it has become evident that the current density provisions fall short of meeting the pressing needs of our community and addressing the broader challenges faced by the construction and housing sectors.

I believe that increasing the density of the Bankstown TOD is crucial to support sustainable urban development, economic stability, and the alleviation of the housing shortage. The Bankstown TOD rezoning proposal aims to enhance the local area by integrating mixed-use developments and improved infrastructure around the transit hub. While this is a commendable objective, the proposed density levels are insufficient.



With the confirmation of the new Bankstown Hospital site, it is essential to recognize the increased demand for residential and commercial infrastructure in the vicinity. A higher density in the Bankstown TOD would better accommodate the anticipated influx of healthcare professionals, patients, and their families, as well as support ancillary services and businesses.

The construction industry is currently grappling with significant challenges, including soaring material costs and labor shortages. Many construction companies are facing financial strain, leading to a reduction in project viability.

By increasing the density within the TOD, we can enhance the economic feasibility of developments. Higher density projects can attract more investment, leading to more efficient use of resources and cost-effective construction practices.

Increased density around transit hubs can stimulate local economies by creating vibrant, mixed-use communities. Higher density can attract retail and commercial businesses, which will provide additional job opportunities and contribute to the local economy's resilience.

Thank you for considering this objection. I am confident that with a revised approach, we can achieve a more effective and beneficial outcome for Bankstown and its residents.

Kamala Tran

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 9:51:53 PM

---

Submitted on Sat, 24/08/2024 - 21:51

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Frank

### **Last name**

Kim

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I am just providing comments

### **Submission**

Dear DPHI,

I believe that the proposed density for Bankstown TOD precinct is insufficient to meet the needs of our growing community and to address the broader challenges faced by our housing market. The recent confirmation of the new Bankstown Hospital site further underscores the necessity for higher density development in the area. Below, I present a detailed argument for why increased density is crucial for the success of the TOD and the overall sustainability of the region.

The Bankstown area is poised for significant growth, with both residential and commercial sectors experiencing increasing demand. The development of a new hospital in the region will not only enhance local healthcare facilities but also attract a substantial number of new residents and workers. To effectively accommodate this influx, it is essential that we plan

for a higher density in the TOD zone.

The new hospital will create numerous job opportunities, including medical, administrative, and support roles. Higher-density residential developments will ensure that these jobs are filled by local residents, reducing the need for long commutes and supporting local businesses. Moreover, increased density will enable a greater variety of services and amenities, enhancing the quality of life for residents and ensuring a vibrant, economically stable community.

The construction industry is currently facing significant challenges, including escalating costs of materials and labor. These challenges have led to a downturn in construction activity and an increased risk of project cancellations. To mitigate these issues and ensure that developments are financially viable, higher density projects are necessary.

Higher density developments often attract more substantial investment due to their potential for greater returns. This investment is crucial for addressing the housing shortage and ensuring that new developments are completed on time and within budget. A density that is too low may result in underinvestment and an inability to meet the housing needs of our growing population.

Higher density development within the TOD zone can also help reduce urban sprawl, which can lead to increased infrastructure costs and environmental impacts. By focusing on densification in strategic areas, we can promote more sustainable growth patterns and preserve green spaces and natural resources.

Thank you for taking these into consideration.

Regards,  
Frank Kim



Bankstown

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Sunday, 25 August 2024 3:09:03 AM

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Submitted on Sun, 25/08/2024 - 03:08

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Vu

**Last name**

Chuminh

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Bankstown

**Please provide your view on the project**

I am just providing comments

**Submission**

Dear DPHI,

After thorough analysis of the Bankstown TOD strategy, it is evident that the proposed density uplift is insufficient to meet the area's evolving needs, particularly around the newly confirmed hospital and the nearby university. The rezoning plan, as it stands, represents a significant downgrade compared to the Bankstown Council's previous Masterplan, which advocated for a more substantial density uplift.

Given the critical role of the new hospital and university, the need for higher density becomes even more pronounced. I urge the Department to consider a revised plan that supports greater density around these key infrastructure nodes to address pressing issues related to housing supply, economic development, and urban resilience.

Urban resilience is a critical factor in managing growth and adapting to future challenges. Higher density around the new hospital and university will contribute to a more resilient urban environment by concentrating resources and infrastructure in a way that supports long-term sustainability.

This approach will enable the area to better withstand economic fluctuations and environmental stresses, ensuring that Bankstown remains a thriving and adaptable community in the face of future changes.

The existing walk-up apartments in the vicinity of the new hospital and university constrain further redevelopment, limiting the potential for additional housing supply. These existing developments, while providing some residential options, do not accommodate the growing demand for new housing in the area.

With the confirmed site of the new Bankstown hospital, which will undoubtedly attract a significant influx of healthcare professionals, patients, and their families, a higher density is imperative to ensure sufficient housing availability. Increasing the density in this area will help mitigate the severe housing shortage and provide much-needed accommodation options for a burgeoning population.

One of the core principles of TOD is to concentrate density around transport hubs to maximize public transport efficiency. The current rezoning proposal does not fully leverage this principle. A higher density around the new hospital and university would significantly enhance the viability of public transport services by increasing the number of potential users.

This, in turn, supports the development of more frequent and reliable public transport options, reducing reliance on private vehicles and alleviating traffic congestion. Enhanced public transport is essential for connecting residents with the hospital, university, and other key amenities, ensuring that the area remains accessible and well-integrated.

Thank you for the opportunity and all the hard work.

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Sunday, 25 August 2024 3:18:29 AM

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Submitted on Sun, 25/08/2024 - 03:18

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Tran

**Last name**

Quivuong

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Bankstown

**Please provide your view on the project**

I am just providing comments

**Submission**

Dear Department,

The current rezoning plan represents a significant reduction in density compared to the Bankstown Council's Masterplan, which called for a more ambitious approach. Given the importance of the new hospital and university to the region, an increase in density is both necessary and urgent. Below, I provide an extensive and detailed rationale for why further density uplift is crucial.

Higher density increases the demand for local services, which can lead to improved service provision and better access for residents. This heightened demand supports the development of new facilities and enhances the overall quality of local services. Low density can limit the demand for and efficiency of local services, such as schools, healthcare facilities, and recreational centers.

With rising costs and economic challenges, increasing density can help make development projects more financially viable. This is crucial for stabilizing the construction industry, which is facing shutdowns due to high material and labor costs. Higher density development around the new hospital and university will support job creation not only in the construction industry but also in local businesses that cater to the increased residential population.

Higher density development ensures that infrastructure is used more effectively. By concentrating development, we can make better use of existing resources and reduce the per capita cost of infrastructure maintenance and upgrades. This approach maximizes the benefits of public investments and supports efficient urban management.

The current proposal's density levels may not fully utilize existing infrastructure, such as roads, utilities, and public amenities. This can lead to underutilization and inefficiencies.

The existing walk-up apartments near the new hospital and university are limiting further redevelopment opportunities. These low-density buildings occupy valuable land and prevent the construction of additional housing units. With the new hospital and university expected to draw a significant number of healthcare professionals, students, and their families, there is an urgent need for more residential options in the area. The current density proposal fails to address this growing demand adequately.

Higher density development will provide the necessary housing supply to meet the needs of the expanding population. By facilitating the construction of additional residential units, we can alleviate the severe housing shortage in Bankstown and ensure that the influx of new residents can be accommodated effectively.

The new hospital and university are expected to be major economic drivers in the region, creating numerous jobs and stimulating local businesses. Higher density around these key institutions will enhance their economic impact by increasing the local residential base. This, in turn, will lead to higher demand for goods and services, benefiting local retailers, restaurants, and service providers.

With the construction industry facing challenges due to rising material and labor costs, higher density projects can make developments more economically viable. By increasing the density around the hospital and university, we can support job creation in the construction sector and stabilize the industry, which is crucial given the current economic uncertainties.

Thank you for the opportunity to provide feedback and hopefully the current plan can be revised to resolve the above issues.

Regards,  
Tran Quivuong (Danny)

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Sunday, 25 August 2024 8:27:17 PM

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Submitted on Sun, 25/08/2024 - 20:27

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Lisa

### **Last name**

Sato

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I am just providing comments

### **Submission**

Dear DPHI,

I am writing regarding the Bankstown TOD rezoning proposal. While I acknowledge the effort to revitalize and enhance Bankstown, I firmly believe that the current plan falls short of addressing the urgent need for higher density.

The demand for housing in Bankstown is growing at a rapid pace, driven by both population growth and urban migration. As more people move into the area, whether due to job opportunities, lifestyle preferences, or other factors, the existing housing stock struggles to keep up with the increased demand. Without adequate increases in housing density, the supply of available homes will remain limited, leading to heightened competition and inflated housing prices. This imbalance exacerbates affordability issues and makes it increasingly difficult for new residents, especially young families and low-

income individuals, to find suitable accommodation.

Furthermore, the demand for housing is not static; it evolves with demographic changes, including household formation rates, migration trends, and economic shifts. As Bankstown's population continues to expand, so too will the demand for various types of housing, from single-family homes to apartment units. A rezoning plan that fails to account for these trends risks creating a housing shortage that could stifle local growth and development. Increased density is essential to meet the current and future housing needs of the community, ensuring that Bankstown remains an attractive and accessible place for all residents.

Addressing housing demand through increased density also supports a more balanced housing market. By providing a diverse range of housing options within a denser framework, the area can accommodate different income levels and family sizes. This approach helps to alleviate pressure on the housing market, making it more resilient to fluctuations and better equipped to handle the needs of a growing population.

Access to healthcare is a fundamental aspect of quality of life and community well-being. Higher density development can improve healthcare access by concentrating population growth within areas that can support the establishment of medical facilities and services. This ensures that residents have convenient access to essential healthcare services.

Increased density supports the development of medical centers, clinics, and hospitals by creating a sufficient patient base. This can lead to the expansion of healthcare services and the introduction of specialized medical facilities, enhancing the overall healthcare infrastructure in Bankstown. Additionally, a higher population density can justify investments in advanced medical technologies and services.

Furthermore, denser communities can facilitate the integration of healthcare services with other public services and amenities. This can lead to more comprehensive and coordinated care, improving overall health outcomes and reducing the need for residents to travel long distances for medical appointments. By embracing higher density, Bankstown can enhance its healthcare system and provide better access to essential services for its residents.

Economic growth is closely linked to the availability and accessibility of housing. Increased density in Bankstown can significantly contribute to local economic development by attracting more residents and businesses to the area. A higher population density translates into a larger customer base for local businesses, which can stimulate retail and service sector growth. This, in turn, generates more jobs and enhances the overall economic vitality of the community.

Thank you,  
Lisa Sato

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Sunday, 25 August 2024 9:14:15 PM

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Submitted on Sun, 25/08/2024 - 21:13

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Kiki

**Last name**

Leung

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[kiki1997@gmail.com](mailto:kiki1997@gmail.com)

**Suburb/Town & Postcode**

Bankstown

**Please provide your view on the project**

I am just providing comments

**Submission**

Dear Sir/Madam,

I wish to comment on the Bankstown TOD masterplan, while the masterplan outlines several positive changes, yet it lacks the necessary density uplift in crucial areas that could significantly benefit from increased development. The new hospital and the Little Saigon shopping centre represent pivotal nodes in the area's urban framework and should be focal points for higher density development.

The new hospital is a major infrastructure asset that will attract significant numbers of visitors, staff, and residents. It is essential to capitalize on this opportunity by increasing the surrounding density. Higher density in this vicinity would support a range of essential services and amenities, contributing to a more vibrant and sustainable community. By enhancing residential and commercial density near the hospital, we can ensure that this



area becomes a thriving hub of activity, thereby maximizing the potential economic and social benefits of the new healthcare facility.

Furthermore, higher density development around the hospital can lead to improved accessibility and reduced travel times for patients and staff, which aligns with broader goals of efficient urban planning and sustainability. The proximity to a major health service provider should be leveraged to foster a diverse and dynamic community that can support the hospital's needs while contributing to the overall growth of Bankstown.

The Little Saigon shopping centre is a vital cultural and economic asset that draws a considerable amount of foot traffic and contributes to the local economy. Increasing density around this area can enhance its role as a central commercial and cultural hub. Higher density development would provide additional retail space, residential options, and amenities, further strengthening the shopping centre's position as a focal point within Bankstown.

Moreover, enhanced density in this area would support the development of a mixed-use environment, integrating residential, commercial, and recreational spaces. This approach not only boosts local economic activity but also creates a more engaging and vibrant community atmosphere. The concentration of development around Little Saigon can lead to a more cohesive and lively urban environment, which aligns with the broader vision of creating a dynamic and attractive cityscape.

Encourage mixed-use developments that combine residential, commercial, and community spaces to maximize the benefits of increased density and foster a more vibrant urban environment.

Thank you for considering my feedback. I look forward to your response and hope for a positive revision of the masterplan to better align with the community's needs and aspirations.

Regards,  
Kiki Leung



**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Monday, 26 August 2024 1:40:40 AM  
**Attachments:** [REDACTED] [-tod.pdf](#)

---

Submitted on Mon, 26/08/2024 - 01:31

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Bankstown

**Please provide your view on the project**

I object to it

**Submission file**

[REDACTED] [-tod.pdf](#) (318.03 KB)

**Submission**

Dear Sir/Madam,

It is good to know that Bankstown is being considered for rezoning to accommodate the growing population. With this in mind, I kindly request you to reconsider the inclusion of 1 Cambridge Ave Bankstown to B4 zoning.

I have attached a letter supporting my request.

Thank you for your time and attention to this matter. I appreciate your consideration and look forward to a favourable decision.

**I agree to the above statement**  
Yes

Bankstown NSW

22/08/2024

Dear Bankstown TOD Rezoning Proposal Team Leader,

It is good to know that Bankstown is being considered for rezoning in order to accommodate the growing population. With this in mind, I kindly request you to reconsider the inclusion of the following addresses into the B4 zone:

- 1 Cambridge Ave Bankstown 2200 (Currently Zone R4)
- 3 Cambridge Ave Bankstown 2200 (Currently Zone R4)

These two addresses play a crucial role in the development of the B4 zone on the corner of Cambridge Ave and Chapel Rd South. The rezoning of the above mentioned addresses will contribute positively to the community and the surrounding area, which can be supported by the following arguments:

1. With the proposed rezoning of 2 Cambridge Ave as a B4 zone, 1 and 3 Cambridge Ave will be visually and functionally inconsistent with the commercial properties surrounding it. Please refer to the proposed map below:

### Extension of the B4 Mixed Use Zone on Chapel Road and Cambridge Street

It is proposed to extend the existing B4 Mixed Use Zone on Chapel Road and Cambridge Street. By proposing to rezone three properties from R4 Medium Density Residential to B4 Mixed Use it will encourage activity close to open spaces (Figure 9).

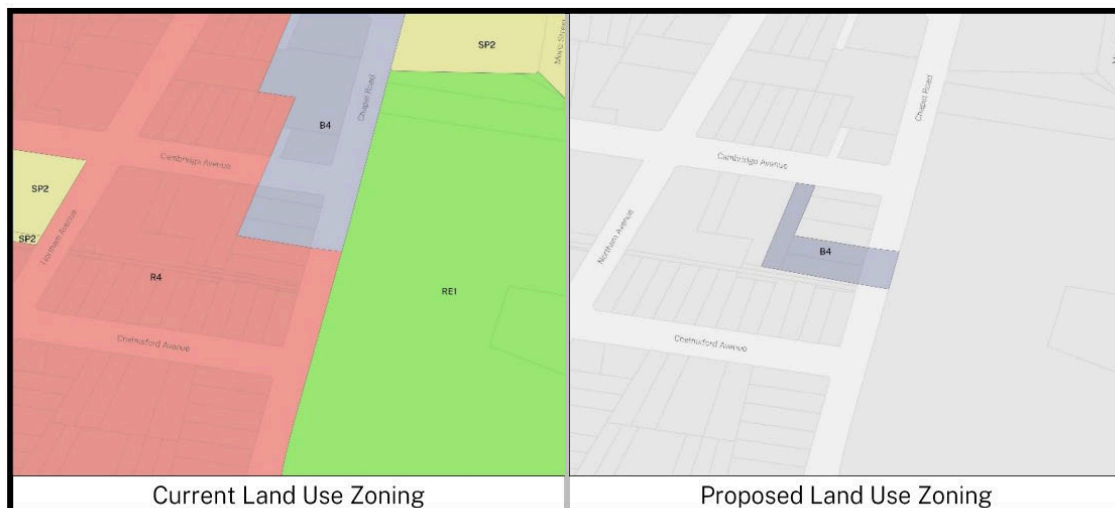


Figure 9: Current vs Proposed Land Use Zoning with properties proposed to be rezoned from R4 to B4

Accordingly, if 1 and 3 Cambridge Ave were to be amalgamated to the existing B4 zone, then any future developments will increase aesthetic appeal and effectively utilise the floor space and height in order to achieve a better-built form. As a result, the current L-shaped B4 zoning will be corrected to a perfect rectangle.

Furthermore, the B4 zone will be restricted to a designated area.

2. Additionally, given that 2 Cambridge Ave will be a commercial property, the noise that will be produced within its trading hours will disrupt the residents of 1 and 3 Cambridge Ave. Amalgamating will minimise the potential conflicts and complications which will arise from differing zones inside the same block.
3. As of now, 1 Cambridge Ave is a brand new double-story residential building. It is not feasible for developers to buy and amalgamate with other properties within the R4 zone. Rather, it is more practical and cost effective to amalgamate with a B4 zone that is currently surrounding the property.

Similarly, 3 Cambridge Ave is an owner's/doctor's surgery. It is not feasible for development with R4 zoning either due to the need for an office and space required for practising the doctor's business. It is unlikely he will amalgamate with other R4 properties for development.

Arguably, with this surgery, it is effectively a 'clayton' B4 zone already.

4. In regards to the Cambridge Lane overall, it will have better utilisation with any future development of a B4 block. This could, for example, include entry and exit into a B4 zoned area.

Ultimately, a full-block B4 zoning will promote cohesive development, further enhance streamline zoning management and benefit our community. I respectfully urge you to consider including these addresses in the B4 zone to support the long-term growth and vitality of the neighbourhood. Thank you for your time and attention to this matter. I appreciate your consideration and look forward to a favourable decision. Please feel free to contact me for any further details or explanations.

Sincerely,

[REDACTED]



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Monday, 26 August 2024 2:46:54 AM

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Submitted on Mon, 26/08/2024 - 02:46

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Ismail

### **Last name**

Hamdan

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I object to it

### **Submission**

I hope this letter finds you well. I am writing to object to the current Bankstown TOD masterplan, as I believe that the proposed density is insufficient for the following reasons.

Bankstown is experiencing rapid population growth, and the current plan does not align with the projected future needs of the community. Increased density will accommodate more residents and meet future demands effectively.

With the establishment of the new hospital, higher density in the surrounding area would ensure that more residents have closer access to essential medical services, improving health outcomes and reducing travel time for appointments.

Concentrating development around key infrastructure like hospitals can lead to more efficient land use. This approach can help protect green spaces and minimize urban sprawl,

promoting a more sustainable environment.

Proximity to healthcare services encourages a healthier lifestyle and timely medical intervention. Increased density ensures that more people live within walking distance of these essential services.

Higher density can lead to the revitalization of underdeveloped or neglected areas, enhancing the overall attractiveness and functionality of the neighborhood.

Thank you for considering my concerns.  
Ismail

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Monday, 26 August 2024 2:51:46 AM

---

Submitted on Mon, 26/08/2024 - 02:51

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Salih

### **Last name**

Mahmud

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Yagoona

### **Please provide your view on the project**

I am just providing comments

### **Submission**

Dear DPHI,

Thanks for the opportunity of Bankstown TOD proposal, after thorough review of all the documentations, I believe that the plan underestimates the critical need for increased density in the area surrounding the new hospital and university campus.

Bankstown is projected to see substantial population growth over the next decade. The current density proposals fail to accommodate this anticipated growth, potentially leading to housing shortages and increased pressure on existing infrastructure.

Increased residential density can generate greater foot traffic, benefiting local businesses and encouraging new commercial ventures. This can lead to job creation and a more vibrant local economy. Higher density in the area can attract healthcare professionals

seeking convenient living arrangements near their workplace, thus supporting the operational needs of the new hospital.

Higher density can lead to increased investment in local projects and infrastructure, such as road improvements, landscaping, and public spaces, benefiting the entire community. Increased density supports the development of mixed-use properties, combining residential, commercial, and recreational spaces. This integration can create more vibrant and walkable neighborhoods.

By increasing density around the hospital, more residents will benefit from proximity to healthcare services, leading to reduced travel time and increased convenience for medical appointments and emergencies. Thank you for considering my objections and recommendations.

Sincerely,  
Salih Mahmud



**I agree to the above statement**  
Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Monday, 26 August 2024 2:59:54 AM

---

Submitted on Mon, 26/08/2024 - 02:59

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Punchbowl

**Please provide your view on the project**

I object to it

**Submission**

Subject: Objection to Bankstown TOD rezoning proposal

I am writing to object to the Bankstown TOD rezoning proposal due to the proposed density levels, which I believe are insufficient for the area's current and future needs. The region around Bankstown is expected to experience a significant population increase. The current masterplan's density levels do not account for this growth, potentially leading to housing shortages and increased pressure on existing services.

Higher density around the hospital maximizes land use efficiency, reducing urban sprawl and preserving surrounding green spaces. This approach contributes to sustainable development and better environmental management.

Denser neighborhoods support the creation and maintenance of community facilities such

as parks, libraries, and recreational centers. These amenities are vital for quality of life and are more feasible in areas with higher residential populations.

Denser populations often result in increased community vigilance and stronger neighborhood networks, which can enhance safety and security by fostering a sense of community and collective oversight.

Higher density can justify and necessitate additional investments in local infrastructure, including road improvements, utility upgrades, and enhanced public spaces, all of which benefit the broader community.

The increased density aligns with broader strategic planning goals, such as reducing urban sprawl, promoting sustainable development, and creating vibrant, mixed-use neighborhoods.

Kind Regards,  
Fadheela

**I agree to the above statement**  
Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Monday, 26 August 2024 3:06:40 AM

---

Submitted on Mon, 26/08/2024 - 03:06

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Nafia

### **Last name**

Khalil

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Chester Hill

### **Please provide your view on the project**

I am just providing comments

### **Submission**

Dear DPHI,

I wish to provide comment on the Bankstown TOD rezoning proposal. The current rezoning masterplan's density levels fail to accommodate this demographic shift, which could lead to a shortage of housing and overburden existing infrastructure. As more people move into the area, the strain on local amenities and services will intensify, potentially resulting in overcrowded schools, insufficient healthcare facilities, and increased traffic congestion.

Inadequate density planning can also lead to fragmented and inefficient urban development. With population growth, there is a need for more residential units, commercial spaces, and community services to be integrated seamlessly into the urban fabric. By not adjusting density levels to match anticipated growth, the plan risks creating

pockets of underdeveloped or neglected areas, which can lead to uneven development and reduced overall quality of life for residents.

Moreover, failing to address population growth through increased density could result in escalating property prices and rents, further exacerbating the housing affordability crisis. A more proactive approach to density planning can ensure that a diverse range of housing options is available, catering to different income levels and family sizes, and ultimately fostering a more inclusive and balanced community.

Increasing density around the hospital is an effective strategy for optimizing land use. The current masterplan's density levels may lead to inefficient land utilization, with large areas remaining underdeveloped or vacant. By concentrating development around key infrastructure, such as the hospital, land can be used more effectively, reducing urban sprawl and preserving surrounding green spaces.

Efficient land use is critical for sustainable urban development. Higher density supports compact, walkable neighborhoods that reduce the need for extensive infrastructure and services. This approach minimizes the environmental impact of new developments and helps to protect valuable natural resources, such as parks and open spaces.

Additionally, optimizing land use through increased density can lead to better integration of residential, commercial, and recreational spaces. This mixed-use development approach creates more vibrant and functional urban environments, where residents have easy access to essential services and amenities.

Denser neighborhoods often experience improved safety and security due to increased community interaction and natural surveillance. With more residents living in close proximity, there is a greater likelihood of vigilant and engaged communities, which can help deter crime and enhance neighborhood safety.

Increased density fosters a stronger sense of community and belonging, which contributes to social cohesion and mutual support among residents. This supportive environment can lead to improved safety and security, as neighbors are more likely to look out for each other and report suspicious activities.

Additionally, higher density can enable the development of well-designed public spaces and infrastructure that promote safety. Features such as well-lit streets, pedestrian-friendly pathways, and active ground-floor uses can create a safer and more secure urban environment for residents.

As the new hospital expands its services and facilities, increased density around the hospital will ensure that the surrounding area can adequately support and integrate these developments. Higher density provides a solid residential and commercial base that can support the hospital's growth and enhance its operational efficiency.

The integration of higher density with new hospital can lead to the development of complementary facilities, such as outpatient clinics, rehabilitation centers, and support services. This approach creates a comprehensive healthcare ecosystem that benefits residents and enhances the overall effectiveness of the hospital.

Additionally, higher density around the hospital can facilitate better coordination between healthcare services and community needs. This integration ensures that the area remains functional and supportive as the hospital evolves and expands, contributing to a more effective and responsive healthcare system.



In conclusion, the Bankstown TOD precinct's current density provisions are insufficient to address the area's needs and potential. I urge the Department of Planning to revise the masterplan to incorporate higher density around the new hospital, ensuring that the development supports sustainable growth, economic development, and improved quality of life for all residents.

Regards,  
Nafia Khalil

 Chester Hill

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Monday, 26 August 2024 7:46:16 PM

---

Submitted on Mon, 26/08/2024 - 19:46

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Akram

**Last name**

Sheikh

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Bankstown

**Please provide your view on the project**

I object to it

**Submission**

Dear Sir/Madam,

The Bankstown TOD rezoning proposal, as it stands, does not adequately address the growing demand for housing, the need for enhanced infrastructure, or the broader economic and social benefits of increased density. I would like to outline several critical reasons why higher density should be considered, each with detailed arguments.

The Bankstown area is experiencing rapid population growth, with projections indicating a significant increase over the next decade. The current plan's density provisions do not align with these projections, potentially leading to a shortfall in housing supply. This mismatch could exacerbate housing affordability issues, pushing more residents into less suitable areas and straining existing services.

Increased density is essential to accommodate the growing population and ensure that residents have access to a range of housing options. Higher density developments can help absorb the influx of new residents and prevent sprawl, which often leads to inefficient land use and greater infrastructure costs. By planning for greater density now, we can avoid the pitfalls of underestimating future growth and ensure a more resilient and adaptable community.

The lack of sufficient density in the masterplan is likely to worsen housing affordability in Bankstown. With a limited supply of housing options, demand will outstrip supply, driving up property prices and rents. This trend could make it increasingly difficult for low- and middle-income families to find affordable housing within the area.

Higher density developments can contribute to a more diverse housing market, including affordable housing options. By increasing density, we can promote the development of various housing types, such as apartments and townhouses, which can be more affordable than single-family homes. This approach can help mitigate the affordability crisis and ensure that residents of all income levels have access to suitable housing.

Higher density can improve access to a range of essential services, including healthcare, education, and retail. When more people live in a concentrated area, service providers are more likely to establish facilities and operations within the vicinity, leading to better access for residents. This can enhance the overall convenience and quality of life in the community.

Improved access to services can also promote social equity by ensuring that all residents have access to necessary resources. Higher density can support the development of community hubs that offer a range of services in one location, making it easier for residents to meet their needs without having to travel long distances. This approach can contribute to a more equitable and accessible community.

Thank you,  
Akram Sheikh

**I agree to the above statement**  
Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Monday, 26 August 2024 7:56:01 PM

---

Submitted on Mon, 26/08/2024 - 19:55

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Hamal

**Last name**

Shaikh

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Yagoona

**Please provide your view on the project**

I object to it

**Submission**

Dear DPHI

I am writing to formally object to the Bankstown Rezoning Masterplan on the grounds that the proposed density is inadequate, especially in the vicinity of the newly announced hospital. The proximity of the hospital presents a unique opportunity to create a more vibrant, well-serviced, and sustainable community.

The new hospital represents a major investment in healthcare infrastructure and is expected to significantly increase the demand for nearby services and amenities. Insufficient density around the hospital could limit the full utilization of this crucial facility, as the area may not support the number of residents needed to sustain various healthcare-related services and businesses.

Higher density development near the hospital can maximize the positive impact of this healthcare facility by ensuring that there is a sufficient population base to support ancillary services such as clinics, pharmacies, and medical offices. This will enhance the accessibility and efficiency of healthcare delivery for residents and optimize the return on investment for the hospital infrastructure.

The presence of a new hospital can stimulate economic growth by attracting related businesses and services. However, insufficient density around the hospital may fail to provide the critical mass needed to support these businesses. Local retailers, restaurants, and service providers may struggle without a sufficient population base.

Higher density development can provide a robust customer base for local businesses, boosting the local economy. A larger residential population near the hospital will support the growth of shops, cafes, and service providers, creating a vibrant commercial environment that benefits both residents and businesses. This economic stimulation can lead to job creation and enhanced community amenities.

The new hospital is likely to increase the demand for nearby housing as healthcare professionals and support staff move to the area. The current density plan may not provide sufficient housing options to accommodate this influx, leading to potential shortages and increased housing costs.

Higher density development can help meet the anticipated demand for housing, providing a range of options for both healthcare workers and local residents. This can include apartment complexes, townhouses, and affordable housing units. By planning for increased density, we can ensure that there is adequate housing supply to support the growing population and maintain housing affordability.

Investments in public facilities, such as parks, libraries, and community centers, are more effective in areas with higher density. The current low-density plan may not provide sufficient population to justify the development and maintenance of these facilities.

Higher density development can support the creation and enhancement of public facilities that benefit the community. A more densely populated area provides a stronger case for investing in and maintaining these amenities, ensuring that residents have access to high-quality public resources. This can improve the overall livability and attractiveness of the neighborhood.

Kind Regards,  
Hamal Shaikh

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Monday, 26 August 2024 8:07:31 PM

---

Submitted on Mon, 26/08/2024 - 20:07

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Caleb

### **Last name**

Saade

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Chester Hill

### **Please provide your view on the project**

I support it

### **Submission**

I would like to provide my objection to Bankstown TOD Rezoning Masterplan. The planned density appears insufficient to fully capitalise on the opportunities presented by this significant investment in education, transport and healthcare.

The new hospital represents a major investment in local healthcare infrastructure. Insufficient density around the hospital could lead to underutilisation of this critical facility. A low-density environment may not provide the population base required to sustain the full range of services the hospital is expected to offer, potentially limiting its effectiveness and accessibility.

Increasing density in the vicinity of the hospital would ensure that the surrounding area can support a higher volume of patient traffic and related services. A greater residential population would facilitate the establishment of healthcare-related businesses and support

services such as pharmacies and diagnostic centres, enhancing the hospital's operational viability and community value.

Sustainable urban development is a key consideration in planning, and higher density can play a significant role in achieving this. The current low-density plan may lead to inefficient land use and contribute to urban sprawl, which can have negative environmental impacts and increase infrastructure costs.

Higher density near the hospital promotes more efficient land use, reducing the need for extensive development in outlying areas. This approach helps preserve green spaces and minimises the environmental footprint of new construction. Sustainable development practices also support a healthier urban environment and align with broader environmental goals.

The new hospital is likely to attract a significant number of healthcare professionals and support staff to the area. The existing density plans may not provide sufficient housing options to accommodate this influx, leading to potential shortages and increased pressure on the housing market.

Increasing density in the vicinity of the hospital can help meet the anticipated demand for housing. This can include a mix of apartment complexes, townhouses, and affordable housing options, ensuring that there is adequate accommodation for both healthcare workers and local residents. Addressing housing needs effectively helps maintain affordability and accessibility.

Efficient access to emergency services is crucial, particularly in areas with a high concentration of healthcare facilities. The current low-density plan might pose challenges for emergency services, as lower density can lead to underdeveloped response infrastructure.

Higher density can support a more effective emergency services network by providing a sufficient population base to justify the investment in these services. This can result in faster response times, improved service delivery, and a safer environment for residents, particularly those living close to the hospital.

Regards,  
Caleb Saade

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Monday, 26 August 2024 8:35:49 PM

---

Submitted on Mon, 26/08/2024 - 20:35

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Emran

### **Last name**

Abdalla

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Punchbowl

### **Please provide your view on the project**

I am just providing comments

### **Submission**

Attention Bankstown TOD Team,

I am writing to comment on the Bankstown Rezoning Masterplan, particularly regarding the density provisions near the newly announced hospital and the existing shopping centres. The proposed density appears insufficient to fully utilise and benefit from these critical amenities.

The new hospital represents a significant investment in our community's healthcare infrastructure. With the current low-density provisions, the area may not generate enough demand to fully utilise the hospital's facilities. This could result in the hospital being underused, diminishing its potential impact on community health and well-being.

Increasing density near the hospital ensures a sufficient population base to support the full



range of healthcare services and facilities. This will enable the hospital to operate at its intended capacity, offering a wide array of medical services and ensuring that the community can fully benefit from this important healthcare resource.

The presence of a new hospital can serve as a catalyst for local economic growth, attracting businesses and services to the area. However, with insufficient density, the potential economic benefits might not be fully realised, as there may not be enough local demand to support new ventures.

Increasing density around the hospital will provide a larger customer base for local businesses, including retail shops, cafes, and medical service providers. This economic stimulation can lead to job creation and a more vibrant commercial environment, benefiting both the local economy and residents.

Sustainable urban development is a key objective in modern planning, and higher density can play a significant role in achieving this. The current low-density plan may contribute to urban sprawl, which can increase environmental impact and strain infrastructure resources.

Higher density development around the hospital and shopping centres promotes more efficient land use and reduces the need for extensive new development in outlying areas. This approach supports sustainable growth by conserving green spaces and minimising the environmental footprint of new construction.

Thank you for your attention to this matter.

Yours sincerely,  
Emran Abdalla

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Monday, 26 August 2024 8:43:33 PM

---

Submitted on Mon, 26/08/2024 - 20:42

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Rizeen

### **Last name**

Ali

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Potts Hill

### **Please provide your view on the project**

I object to it

### **Submission**

Dear DPHI,

The current Bankstown TOD proposal appears to underrepresent the necessary density required to maximise the benefits of the significant developments and infrastructure investment spent on the region, I wish to provide comment on this.

The new hospital is a major healthcare investment with the potential to greatly enhance local medical services. However, the low-density provisions in the current masterplan could lead to an underutilisation of this facility. With fewer residents in the immediate area, there might be insufficient demand to support the full range of services the hospital is designed to offer.

Increasing density around the hospital would ensure that there is a robust population base

to support its operations. This will not only help in maintaining a high level of service but also ensure that the hospital can offer a comprehensive range of medical services and specialisations, benefiting the broader community more effectively.

The arrival of a new hospital typically stimulates local economic activity, including the growth of related businesses. However, without adequate density, there may not be enough local demand to support new commercial ventures, potentially stalling economic benefits and growth in the area.

Increasing density around the hospital and existing shopping centre will provide a larger customer base for local businesses. This can lead to increased foot traffic, higher sales, and the viability of new shops, cafes, and service providers, thereby creating a more vibrant and economically robust local environment.

The new hospital and the established shopping centre are likely to attract more people to the area, increasing the demand for housing. The existing low-density provisions may not adequately address this anticipated demand, leading to potential housing shortages and increased prices.

Higher density development in the area will provide a range of housing options, including apartment complexes and townhouses, to meet the needs of new and existing residents. This will help ensure that there is sufficient housing supply, maintain affordability, and cater to the diverse needs of the community.

The development of a new hospital and the presence of a shopping centre can create numerous job opportunities. However, the current low-density plan might not provide enough local residents to fill these roles, which could limit job creation and economic expansion.

Higher density development can attract a larger workforce by offering nearby housing and amenities. This will help fill job vacancies created by the hospital and shopping centre, stimulate economic growth, and provide employment opportunities for the local community.

Thank you for considering my concerns.

Yours sincerely,  
Rizeen Ali

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Monday, 26 August 2024 10:39:14 PM  
**Attachments:** [dr-kiet-nguyen-tod.pdf](#)

---

Submitted on Mon, 26/08/2024 - 22:36

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2200

**Please provide your view on the project**

I support it

**Submission file**

[dr-kiet-nguyen-tod.pdf](#) (318.69 KB)

**Submission**

i support it but i would request for some changes

**I agree to the above statement**

Yes

Bankstown NSW

21/08/2024

Dear Bankstown TOD Rezoning Proposal Team Leader,

As an owner and doctor operating a surgery at 3 Cambridge Ave, I would like the TOD team to consider adding in the properties below for rezoning to B4 from R4:

- 1 Cambridge Ave Bankstown 2200 (Currently Zone R4)
- 3 Cambridge Ave Bankstown 2200 (Currently Zone R4)

These two addresses play a crucial role in the development of the B4 zone on the corner of Cambridge Ave and Chapel Rd South. The rezoning of the above mentioned addresses will contribute positively to the community and the surrounding area, which can be supported by the following arguments:

1. With the proposed rezoning of 2 Cambridge Ave as a B4 zone, 1 and 3 Cambridge Ave will be visually and functionally inconsistent with the commercial properties surrounding it. Please refer to the proposed map below:

### Extension of the B4 Mixed Use Zone on Chapel Road and Cambridge Street

It is proposed to extend the existing B4 Mixed Use Zone on Chapel Road and Cambridge Street. By proposing to rezone three properties from R4 Medium Density Residential to B4 Mixed Use it will encourage activity close to open spaces (Figure 9).



Figure 9: Current vs Proposed Land Use Zoning with properties proposed to be rezoned from R4 to B4

Accordingly, if 1 and 3 Cambridge Ave were to be amalgamated to the existing B4 zone, then any future developments will increase aesthetic appeal and effectively utilise the floor space and height in order to achieve a better-built form. As a result, the current L-shaped B4 zoning will be corrected to a perfect rectangle.

Furthermore, the B4 zone will be restricted to a designated area.

2. Additionally, given that 2 Cambridge Ave will be a commercial property, the noise that will be produced within its trading hours will disrupt the residents of 1 and 3 Cambridge Ave. Amalgamating will minimise the potential conflicts and complications which will arise from differing zones inside the same block.
3. As of now, 1 Cambridge Ave is a brand new double-story residential building. It is not feasible for developers to buy and amalgamate with other properties within the R4 zone. Rather, it is more practical and cost effective to amalgamate with a B4 zone that is currently surrounding the property.

Similarly, 3 Cambridge Ave is an owner's/doctor's surgery. It is not feasible for development with R4 zoning either due to the need for an office and space required for practising the doctor's business. It is unlikely he will amalgamate with other R4 properties for development.

Arguably, with this surgery, it is effectively a 'clayton' B4 zone already.

4. In regards to the Cambridge Lane overall, it will have better utilisation with any future development of a B4 block. This could, for example, include entry and exit into a B4 zoned area.

Ultimately, a full-block B4 zoning will promote cohesive development, further enhance streamline zoning management and benefit our community. I respectfully urge you to consider including these addresses in the B4 zone to support the long-term growth and vitality of the neighbourhood. Thank you for your time and attention to this matter. I appreciate your consideration and look forward to a favourable decision. Please feel free to contact me for any further details or explanations.

Sincerely,

[REDACTED]

**From:** [Nicholas Nasser](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Subject:** Bankstown TOD rezoning proposal - 67 Rickard road  
**Date:** Tuesday, 27 August 2024 11:29:20 AM  
**Attachments:** [image001.jpg](#)  
[2024-08-20 - 67 RICKARD ROAD - COVERING LETTER AND URBAN DESIGN RESPONSE.pdf](#)

---

Hi,

As discussed over the phone, I am making this submission to this email address due to the size limit restrictions on the website.

Please see attached a copy of a covering letter as well as documentation in relation to 67 Rickard road which is located within the Bankstown TOD rezoning.

This submission is made by Tier Architects on behalf of the owners of the site.

The submission is in support of the TOD study, although the urban design study which we provide identifies that the site is able to accommodate a higher FSR.

I agree to the privacy statement which is on the submissions page.

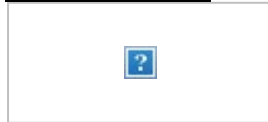
I would like my name and personal contact details to remain confidential.

Regards,

[REDACTED]

ARB. 9457

[REDACTED]



*The information contained in this transmittal and attached documents are confidential and privileged information and are intended for the exclusive use of the addressee. You should only disclose, re-transmit, copy, distribute, act in reliance on or commercialise the information if you are authorised to do so. If you are not the intended recipient or have received this email in error please reply by email to the sender and destroy all copies of this electronic mail immediately. Any views expressed in this Communication are those of the individual sender, except where the sender specifically states them to be the views of Tier Architects Pty Ltd. Whilst we have taken all reasonable care to ensure that neither our system, this email nor any attachments has a virus, it is impossible to guard against every possible virus. We advise you to scan the email and any attachments with your antivirus software prior to use. We do not accept liability for any loss or damage which may arise from receipt of this email or any attachments.*

20/08/2024

The Department of Planning, Housing and Infrastructure

ATT: The Planning Department

Dear Sir/Madam,

I refer to the Explanation of Intended Effect and the Urban Design Framework study prepared for the Bankstown – Transport Oriented Development Precinct.

We thank you for the opportunity to present a more specific analysis for the opportunities at 67 Rickard road Bankstown, and for all of the work that has gone into preparing these studies.

67 Rickard road is located directly across from the recently constructed University of Western Sydney. The site has an area of 5,538m<sup>2</sup> and is unconstrained.

We are supportive of the height proposed for the site under the TOD strategy, however from our assessment and investigation of the proposed controls, we feel that the floor to space ratio which is currently proposed, will deliver the best outcome for the site.

Our site specific analysis has concluded that the floor space ratio of the site should be increased from 4.5:1 to between 5.5 and 5.8:1.

Whilst the detail in relation to this study is provided in the plan sheets appended to this letter, there are three main areas which were identified:

1. The Urban design framework for the site had not taken into consideration the existing neighbouring buildings which are built to the site's boundaries.
2. The proposed "C" shaped building would create self-shadow and reduce the amenity of the future residents.
3. The creation of ground floor courtyards would be an inferior outcome to that of a podium for the future resident's communal open space.

Our built form proposal resolves these three concerns through zero lot alignment of the commercial footprint, removing a leg of the C shaped proposal to create an L shaped built form and having a podium level at level 2 for the communal open space.

Should you have any queries in relation to this study please do not hesitate to contact me.

Regards

Nicholas Nasser  
ARB 9457

[REDACTED]

[REDACTED]



67 RICKARD ROAD BANKSTOWN NSW 2200

RESPONSE TO BANKSTOWN TOD URBAN DESIGN FRAMEWORK RECOMMENDATIONS

1.0 SITE ANALYSIS

1.1 SITE CONTEXT

1.2 SITE SURROUNDINGS

1.3 SITE CONSTRAINTS

2.0 BUILT FORM STUDY

2.1 URBAN DESIGN FRAMEWORK ENVELOPE

2.2 PROPOSED AMENDMENTS TO COMMERCIAL ENVELOPE

2.3 RELOCATION OF BUILT FORM

2.4 INVESTIGATING A FUNCTIONAL TOWER FOOTPRINT

2.5 RESPONSE TO THE URBAN DESIGN FRAMEWORK

2.6 GFA BREAKDOWN

3.0 LEP AMENDMENTS

3.1 ATTRIBUTION PLAN

3.2 PROPOSED LEP CHANGES

4.0 INDICATIVE FLOOR PLANS

4.1 BASEMENT 2 FLOOR PLAN

4.2 BASEMENT 1 FLOOR PLAN

4.3 GROUND FLOOR PLAN

4.4 LEVEL 1 FLOOR PLAN

4.5 TYPICAL LOW-RISE FLOOR PLAN

4.6 TYPICAL MID-RISE FLOOR PLAN

4.7 TYPICAL HIGH-RISE FLOOR PLAN

5.0 DESIGN CONCEPTS

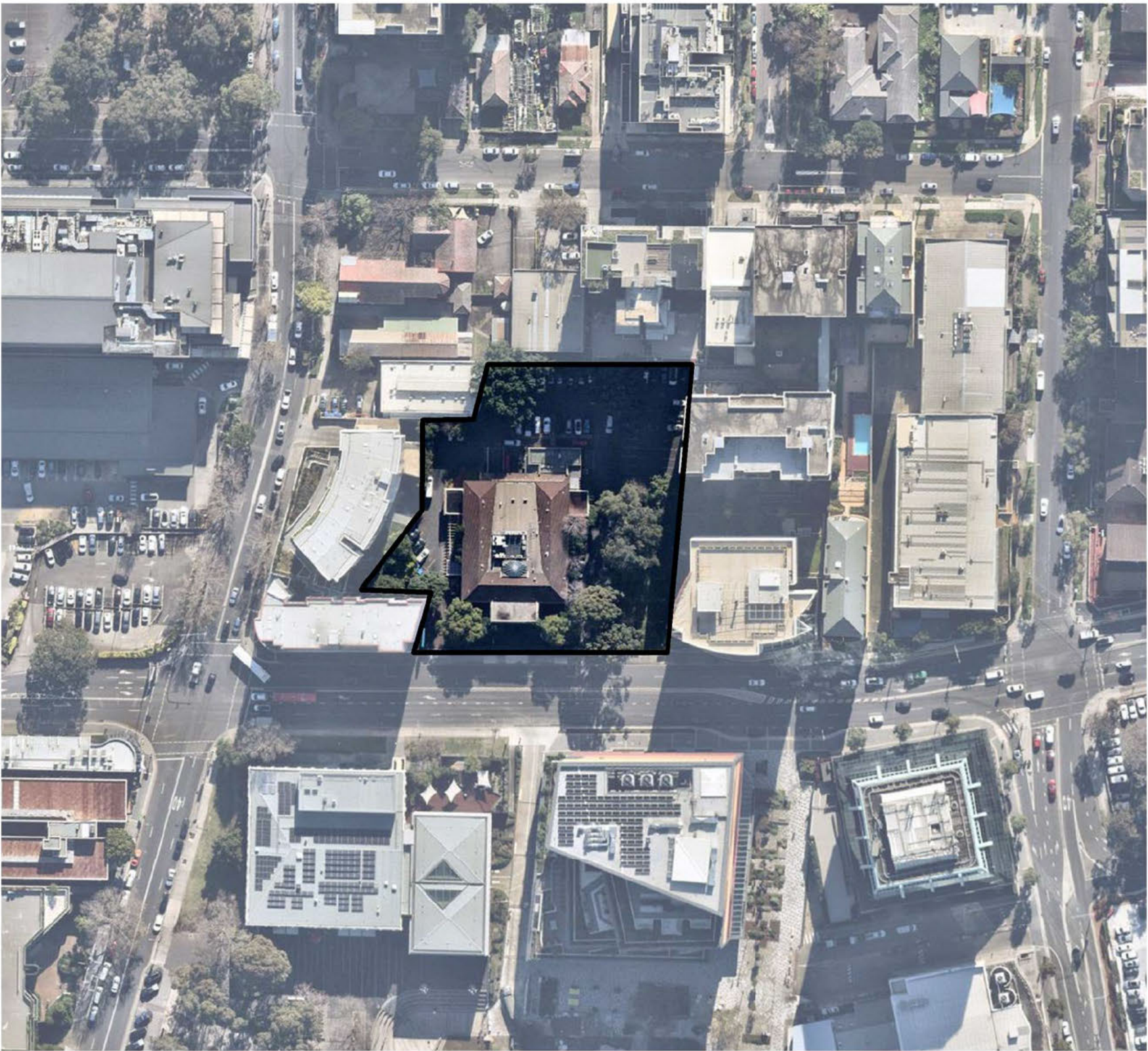
5.1 ACTIVE FACADE

5.2 BUILDING PODIUM

5.3 INTERNAL SHOPPING STREET

5.4 RESIDENTIAL COMMUNAL OPEN SPACES

5.5 GREEN BUILDING



A	16/08/2024	UD RESPONSE
ISSUE	DATE	DESCRIPTION

CLIENT	DATE	SCALE
PROJECT 67 Rickard Rd BANKSTOWN	16/08/2024	
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# 1.0 SITE ANALYSIS

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ISSUE	DATE	DESCRIPTION



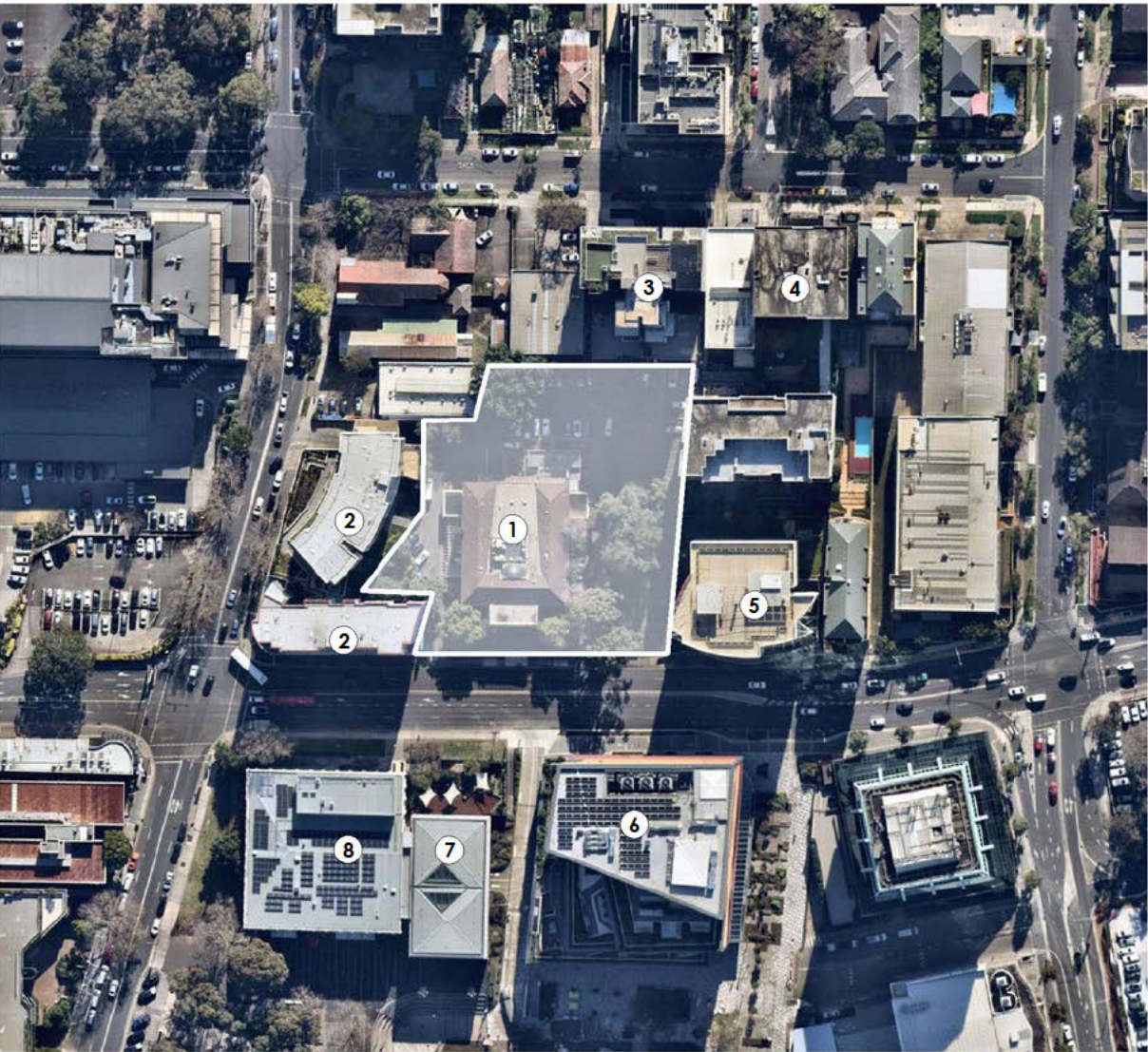
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PROJECT	67 Rickard Rd BANKSTOWN	DRAWN PV
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1.1 SITE CONTEXT

67 Rickard Road Bankstown is an irregular shaped parcel of land which is located opposite the new Western Sydney University Campus and Bankstown Library. The sites primary frontage is to Rickard Road. The site has an area of 5538m².

The site is currently occupied by a two-storey medical centre which has been servicing the community for approximately 20 years.



1. SUBJECT SITE



2. ADJOINING 9 STOREY MIXED USED DEVELOPMENT (SOUTH BUILDING FRONTING RICKARD ROAD)



2. ADJOINING 9 STOREY MIXED USED DEVELOPMENT (NORTH BUILDING FRONTING CHAPEL ROAD)



3. 9 STOREY RESIDENTIAL FLAT BUILDING NORTH OF SITE ON FRENCH AVE



4. 9 STOREY RESIDENTIAL FLAT BUILDING NORTH-EAST OF SITE ON FRENCH AVE



5. 10 & 8 STOREY MIXED USE DEVELOPMENTS EAST OF SUBJECT SITE



6. WSU BANKSTOWN CITY CAMPUS ACROSS FROM SITE. THE BUILDING IS 17 STOREYS AT APPROX 80m IN HEIGHT



7. BANKSTOWN LIBRARY, SOUTH OF SITE



8. BANKSTOWN TOWN HALL BUILDING

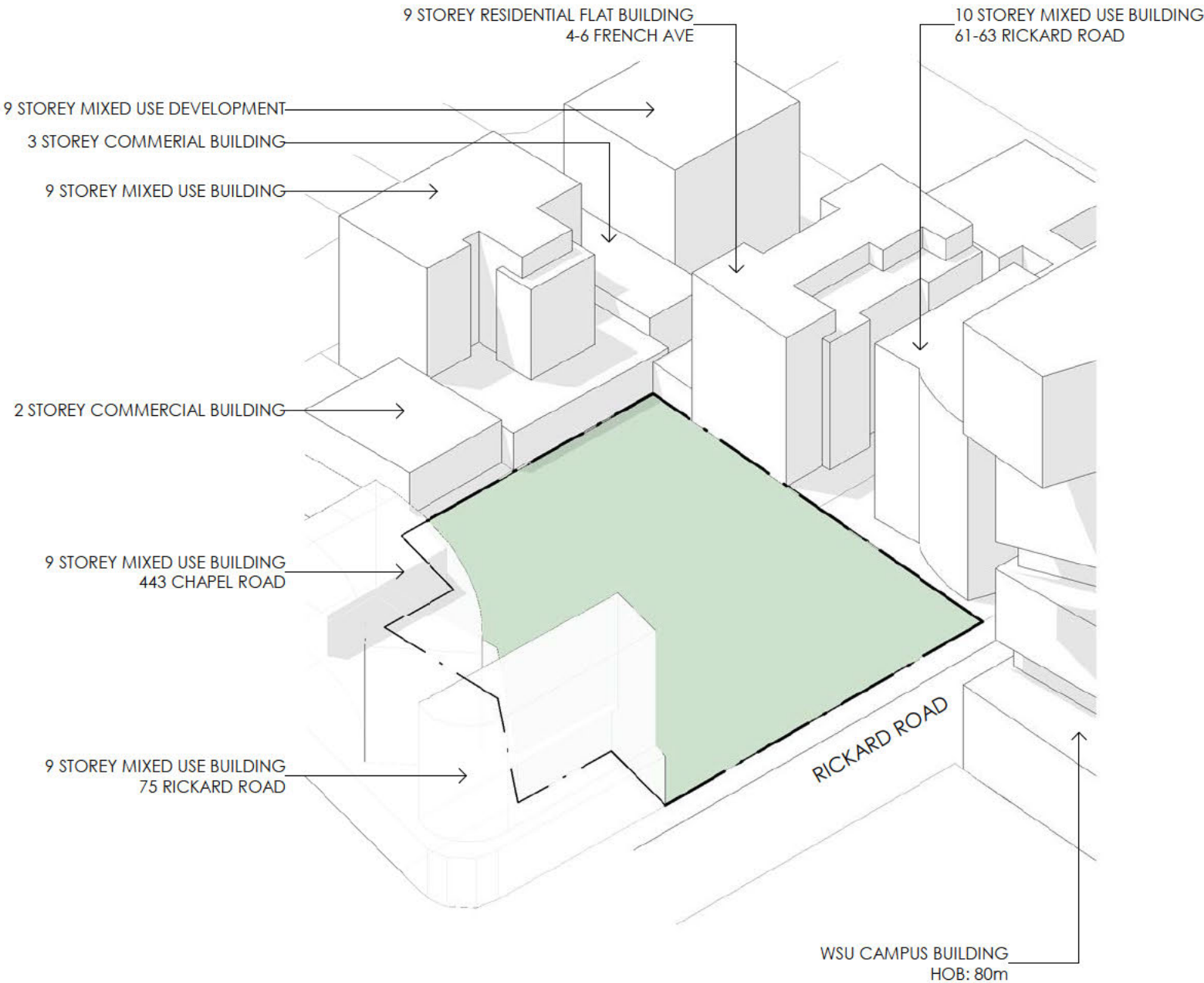
A	16/08/2024	UD RESPONSE
ISSUE	DATE	DESCRIPTION



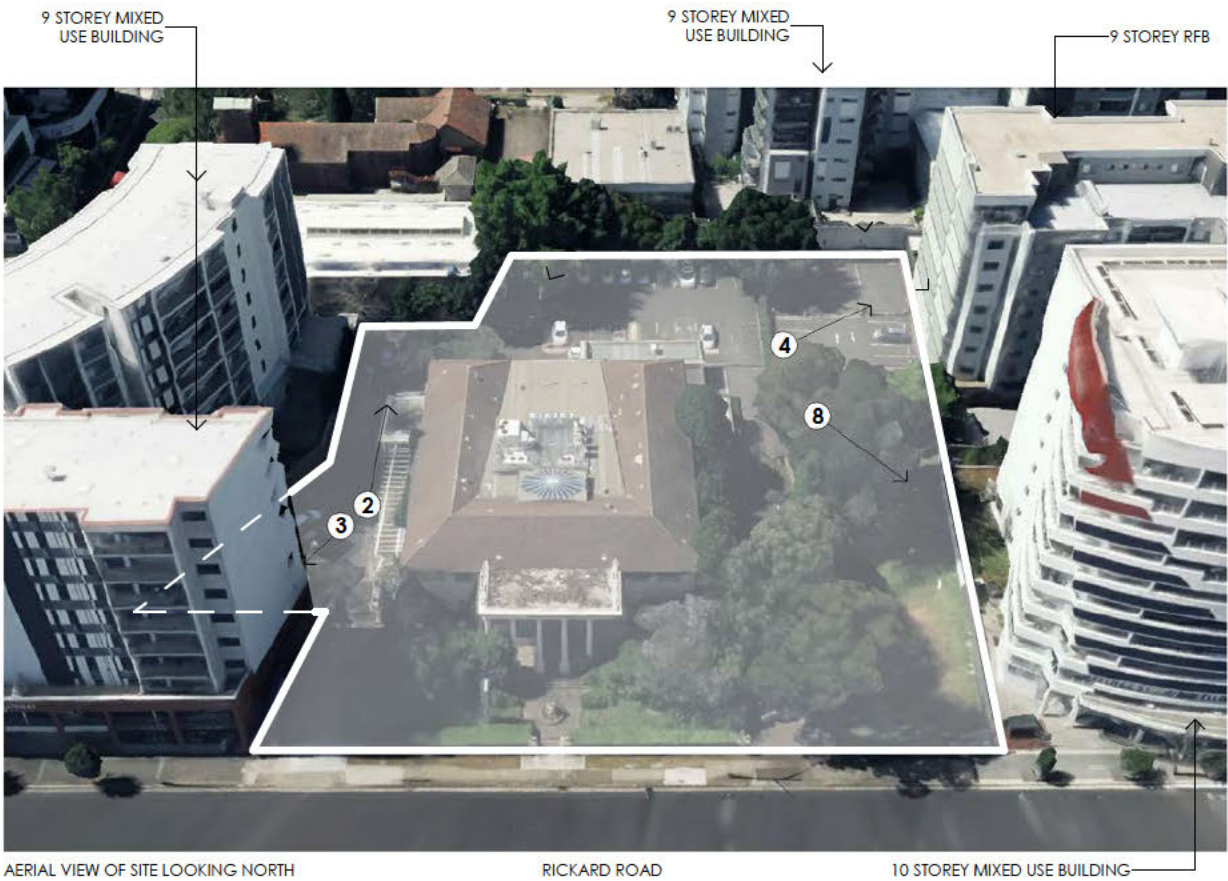
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PROJECT	67 Rickard Rd BANKSTOWN	DRAWN
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		DWG No
		1.1
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1.2 SITE SURROUNDINGS



The sites immediate interface is with a mix of developed and undeveloped lots. At the Rickard Road frontage the site is bound by a 9 storey building to the west and a 10 storey building to the east. Both of these sites are zero lot aligned with commercial uses at the ground and first floors.

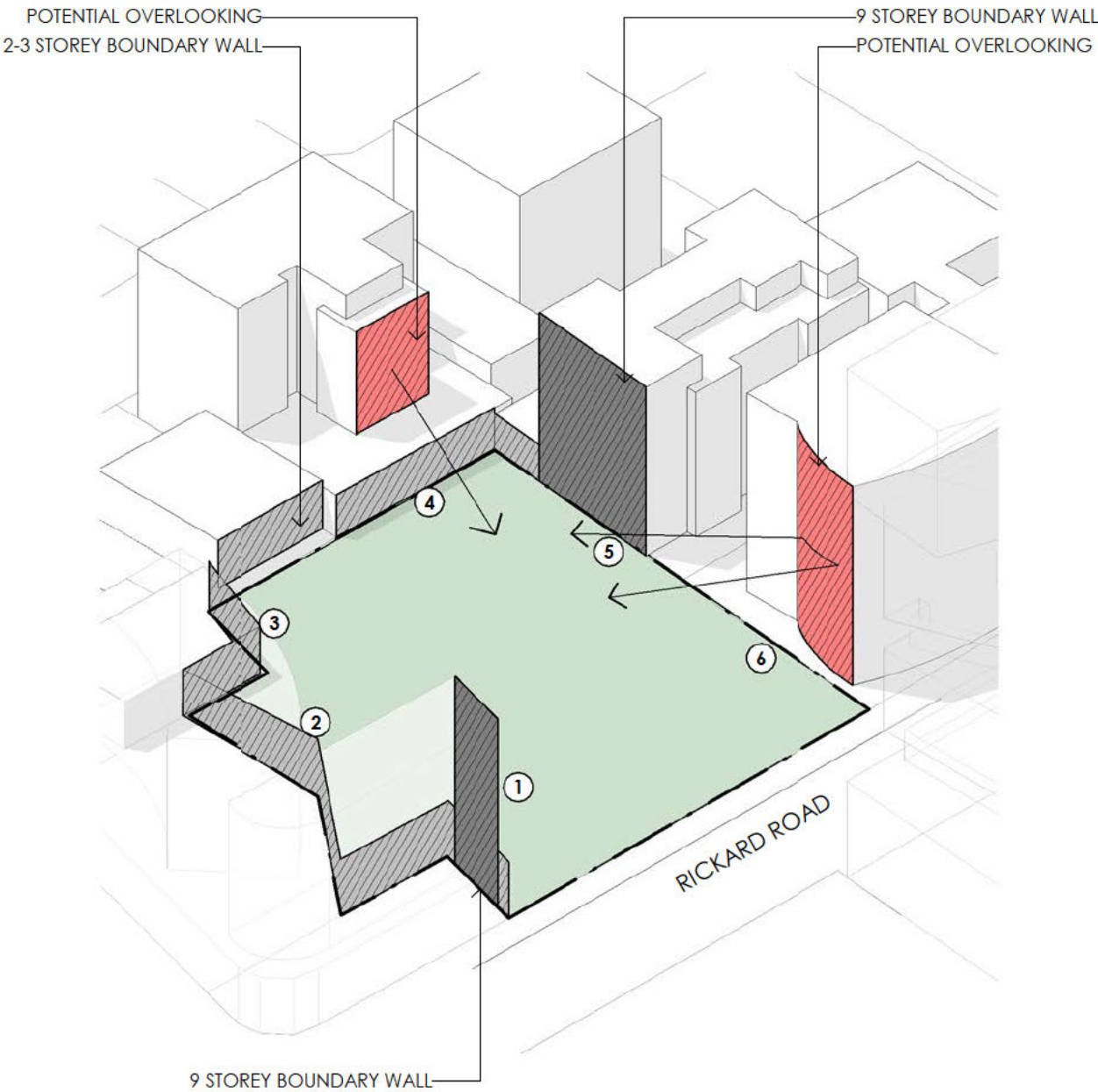


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ISSUE	DATE	DESCRIPTION

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PROJECT 67 Rickard Rd BANKSTOWN	DRAWN PV	CHECKED NN
TITLE SITE SURROUNDINGS	DWG No -	1.2
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1.3 SITE CONSTRAINTS



The nature of the neighbouring development is mainly mixed use and residential flat buildings. This has resulted in zero lot aligned walls facing the site in various locations. These walls are generally unfinished and plain.



1. 9 STOREY BLANK WALL ON THE ZERO BOUNDARY WEST OF THE SUBJECT SITE



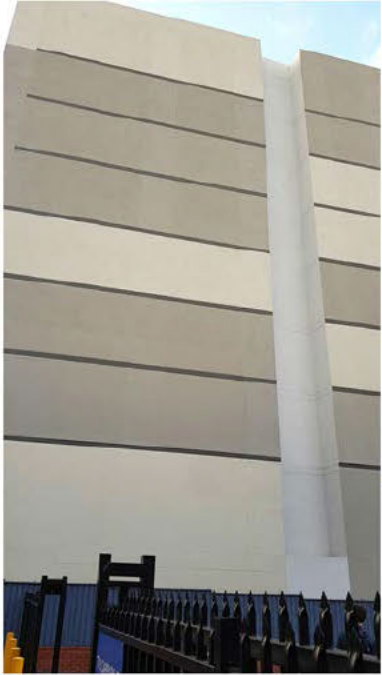
2. 2 STOREY BLANK WALL ALONG THE WESTERN BOUNDARY



3. 2 STOREY BUILDING WALLS OF 457 CHAPEL ROAD ALONG THE WESTERN BOUNDARY OF THE SUBJECT SITE



4. 2 STOREY BUILDING PODIUM WALLS OF THE MIXED USE BUILDINGS IN THE NORTH WESTERN CORNER OF THE SUBJECT SITE



6. WINDOWS AND BALCONIES OF THE EASTERN ADJOINING MIXED USE DEVELOPMENT

5. 9 STOREY BLANK WALL ON THE ZERO BOUNDARY EAST OF THE SUBJECT SITE

ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE

CLIENT	67 Rickard Rd BANKSTOWN	DATE	16/08/2024	SCALE	A3 1:100
PROJECT		DRAWN	PV	CHECKED	NN
TITLE	SITE CONSTRAINTS	DWG No			1.3
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# 2.0 BUILT FORM STUDY

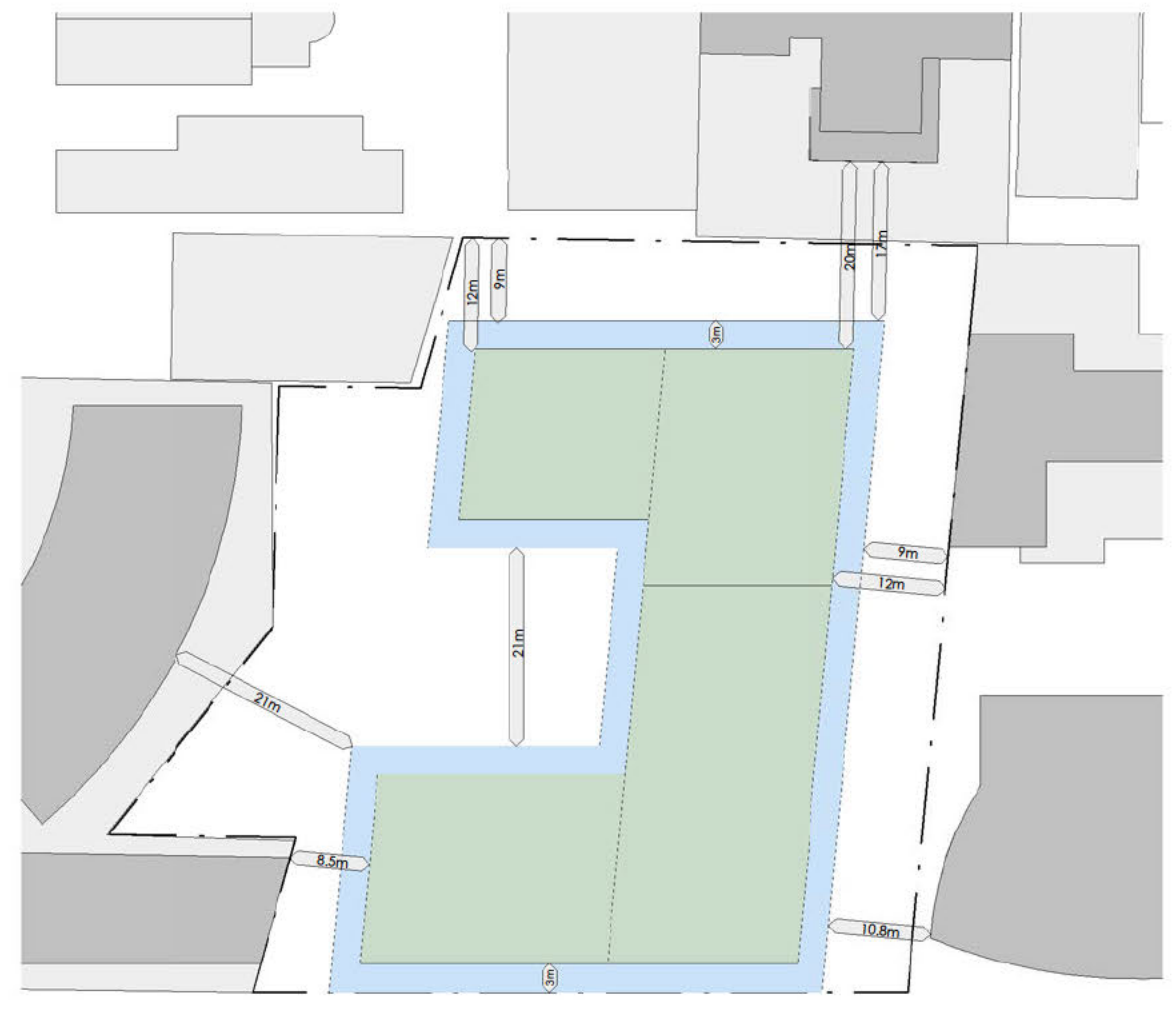
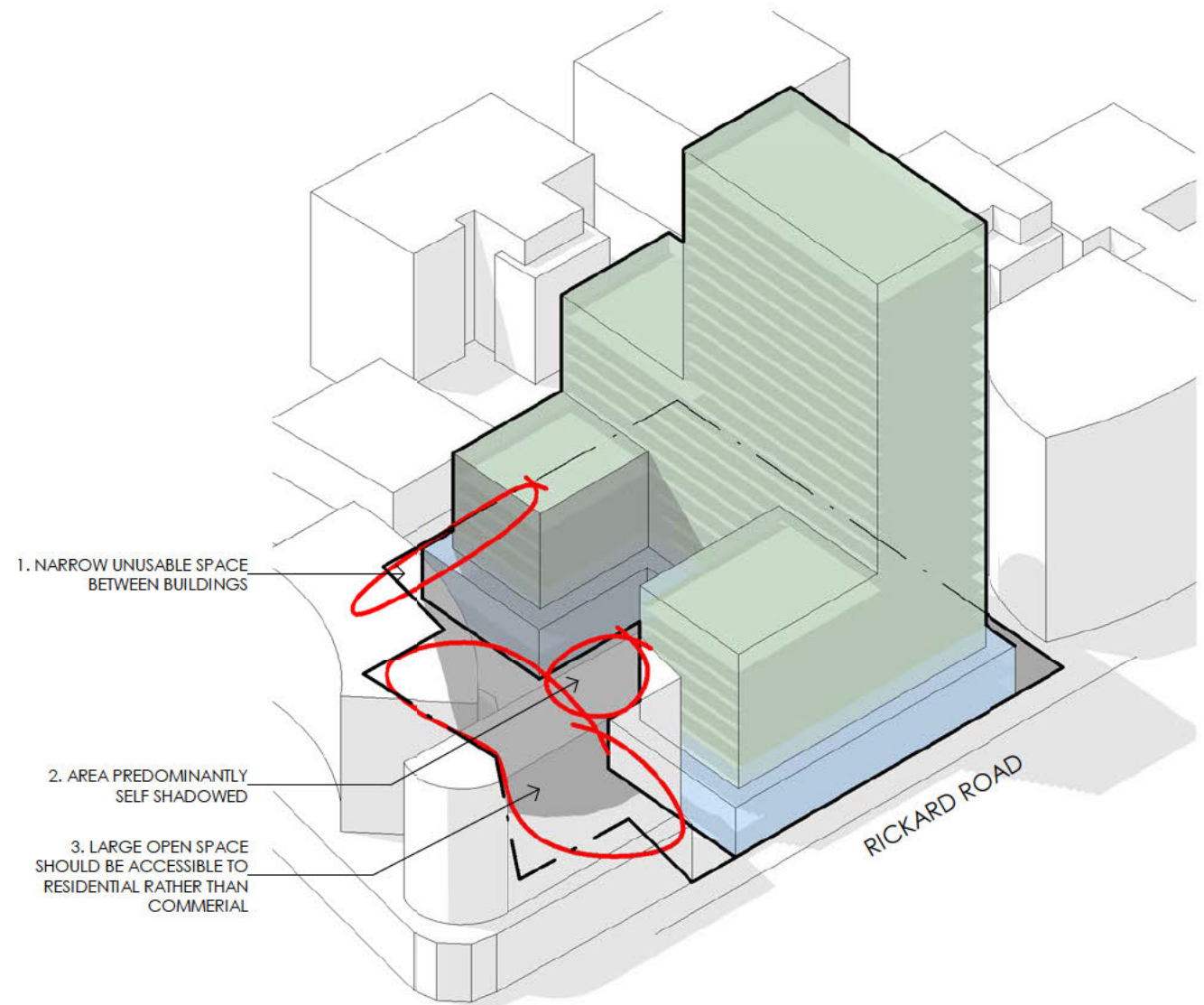
A	16/08/2024	LID RESPONSE
ISSUE	DATE	DESCRIPTION



CLIENT	DATE 16/08/2024	SCALE A3
PROJECT	67 Rickard Rd BANKSTOWN	DRAWN PV CHECKED NN
TITLE	BUILT FORM STUDY	DWG No 2.0
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# 2.1 URBAN DESIGN FRAMEWORK ENVELOPE



Following the release of the Urban Design Framework, we have carried out a study of what is proposed for the site at 67 Rickard Road and raise the following concerns.

1. The commercial area as shown in the framework study, will create narrow spaces along the side and rear setbacks. This, when coupled with the existing neighbouring walls which are built to the boundary, will create "sunken" spaces with little amenity and very limited solar access.
2. The "C" shaped built forms of the commercial and the residential components will self-shadow.
3. The ground floor courtyard will be difficult for residents to access considering the commercial use proposed. This space would be better filled in, creating a podium for the communal space.

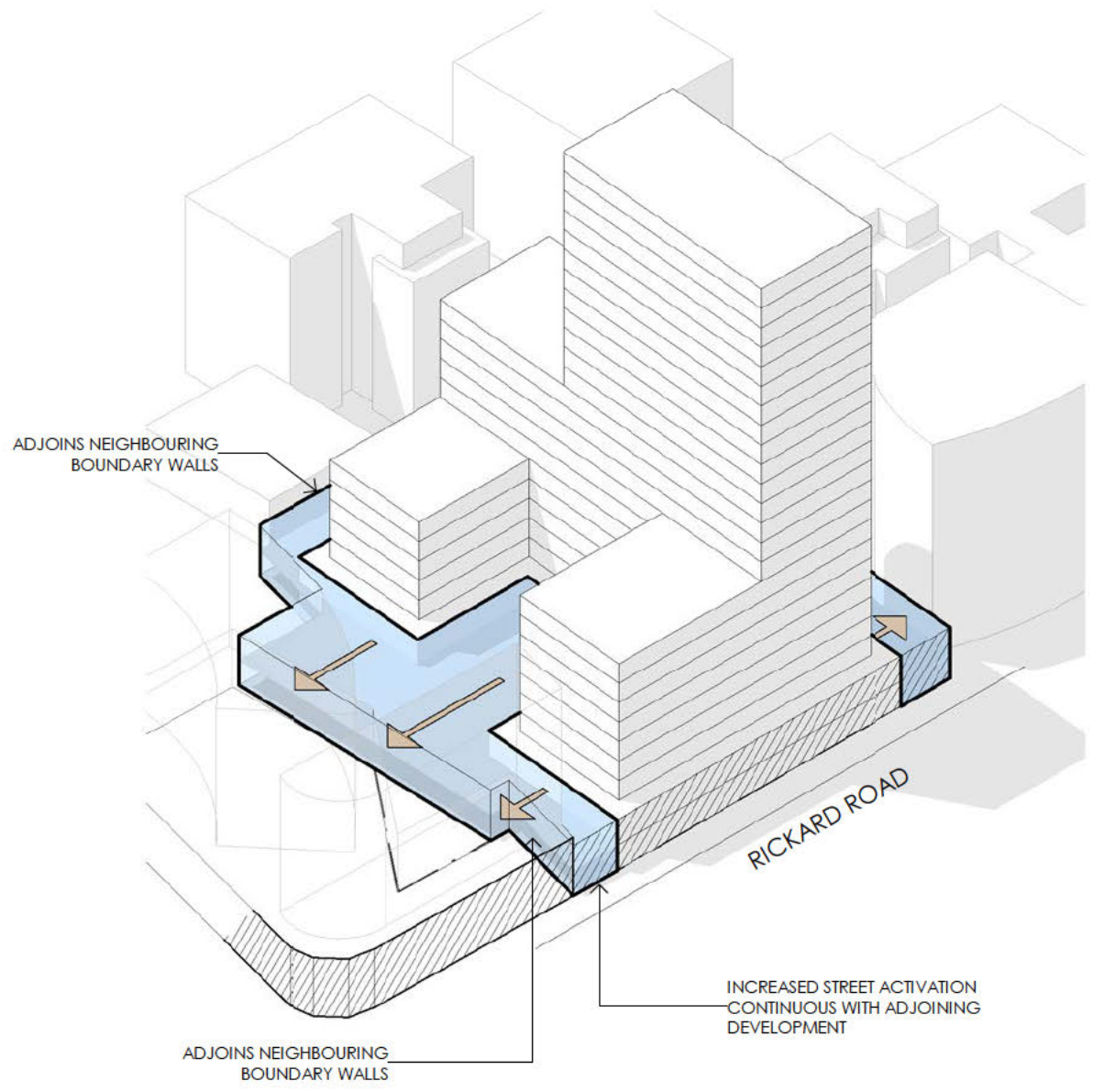
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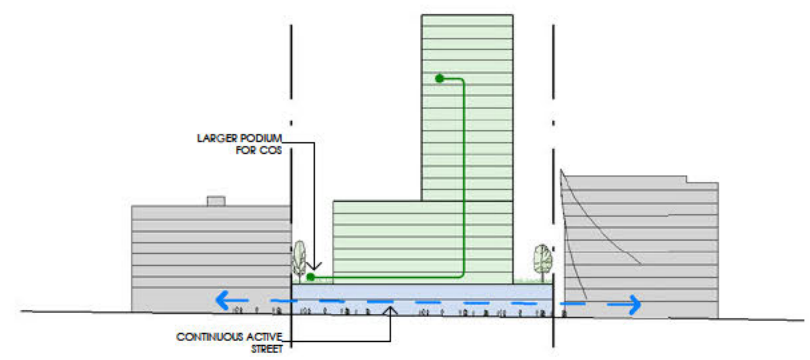
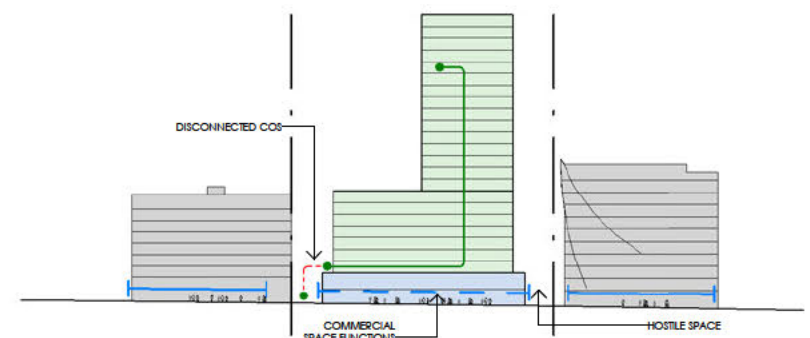
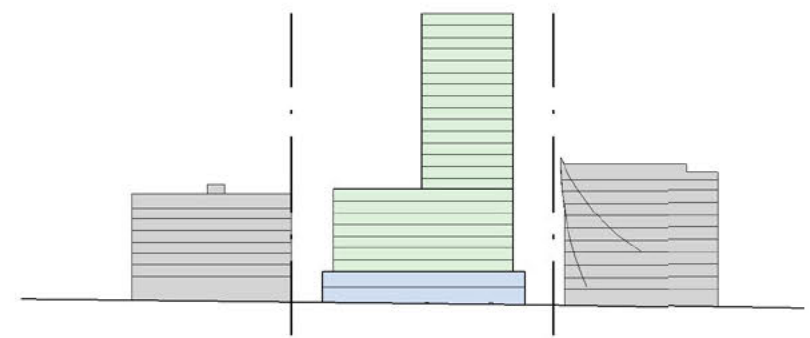
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67 Rickard Rd BANKSTOWN		
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PV	NN	
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URBAN DESIGN FRAMEWORK ENVELOPE	2.1	

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## 2.2 PROPOSED AMENDMENTS TO COMMERCIAL ENVELOPE



1. By expanding the ground floor commercial area it will prevent the creation of unusable areas at the ground floor. A larger commercial footplate also allows flexibility to future tenants. The current user of the site, a medical centre, has expressed interest in remaining on the site if it redevelops, which will take a large portion of the commercial space.
2. Extending the commercial floorplate along Rickard Road will promote the active streetfront, connecting the two shop fronts of the neighbouring buildings.
3. The rooftop space of the larger commercial podium has improved proportions for use as a communal open space and also will provided increased opportunities for solar access.

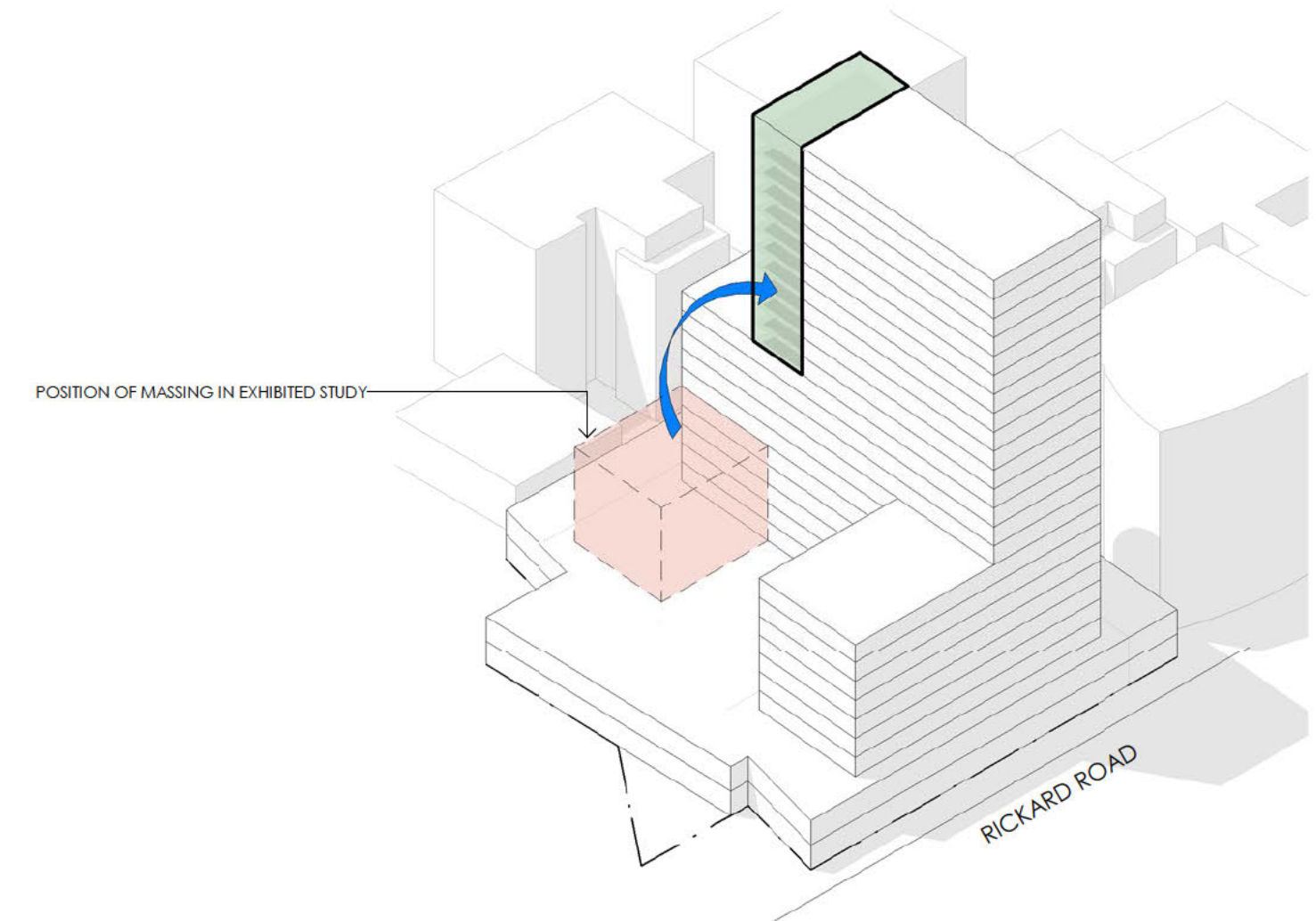


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A	16/08/2024	UD RESPONSE

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PROPOSED AMENDMENTS TO COMMERCIAL ENVELOPE	PV	NN
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## 2.3 RELOCATION OF BUILT FORM

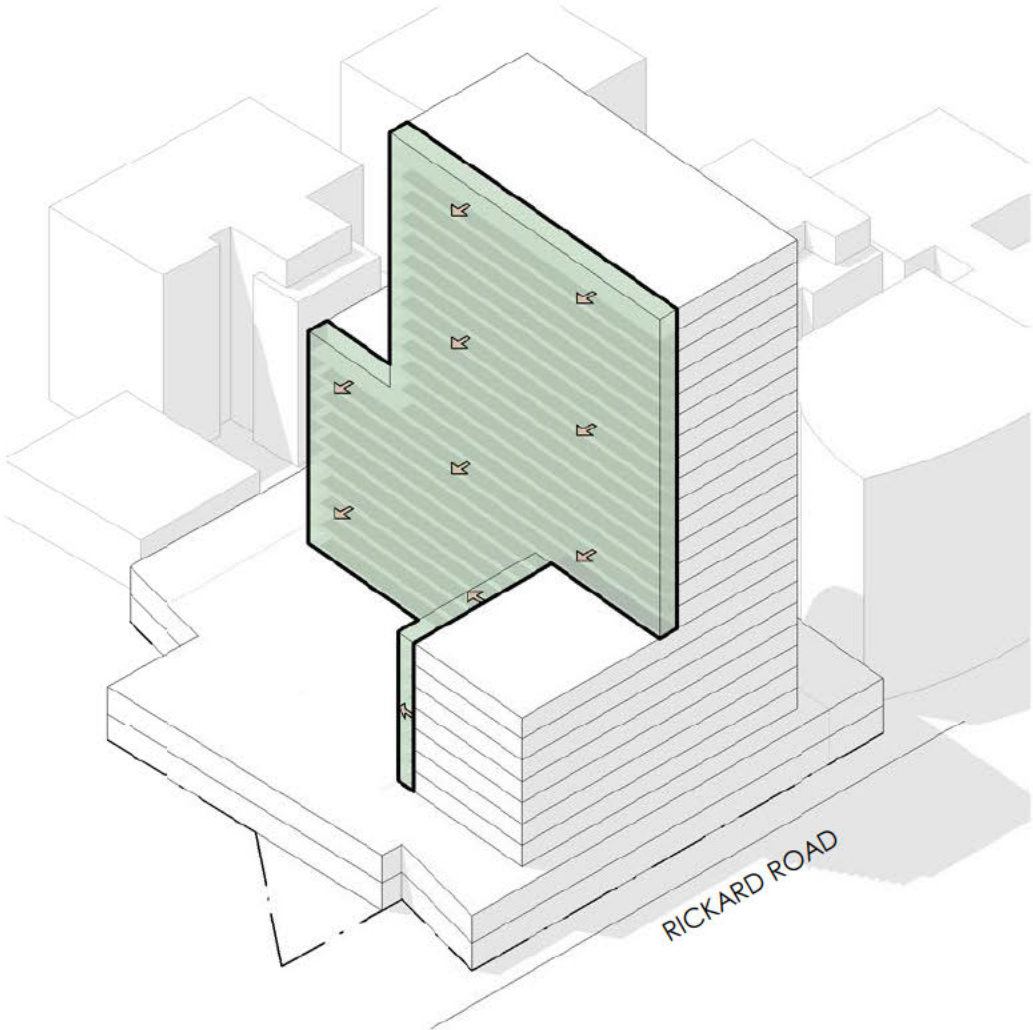


- 1. Through repositioning the northern part of the low-rise massing to the tower, it creates more opportunity for a sunlit podium and reduces self-shadow.
- 2. This shift will create a podium with an area of approximately 1500m<sup>2</sup>, ideal for communal open space. Considering 25% of the site area will be required for COS, which equates to 1375m<sup>2</sup>, it appears that this area would be a good fit.

A	16/08/2024	UD RESPONSE
ISSUE	DATE	DESCRIPTION

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# 2.4 INVESTIGATING A FUNCTIONAL TOWER FOOTPRINT



The modelling of the tower in the Urban Design Framework, appears to have been based on a narrow building typology.

We would suggest that the tower footprint should be at least 23 meters wide to accommodate a double loaded corridor with appropriate services, as shown in the example floor plans on this sheet.

Considering the sites aspect and tower orientation, this will lead to apartments facing predominately north, east and west leading to appropriate solar access.



2 ICONIC Building by SJB Architects  
1 : 800



3 THE ROTHCHILD by Candalepas  
1 : 800



4 MAC Residences by BATES SMART  
1 : 800



5 35 HONEYSUCKLE DR by SJB Architects  
1 : 800



6 SITE 53 OLYMPIC PARK by BVN  
1 : 800



7 180 GEORGE by WOODS BAGOT  
1 : 800

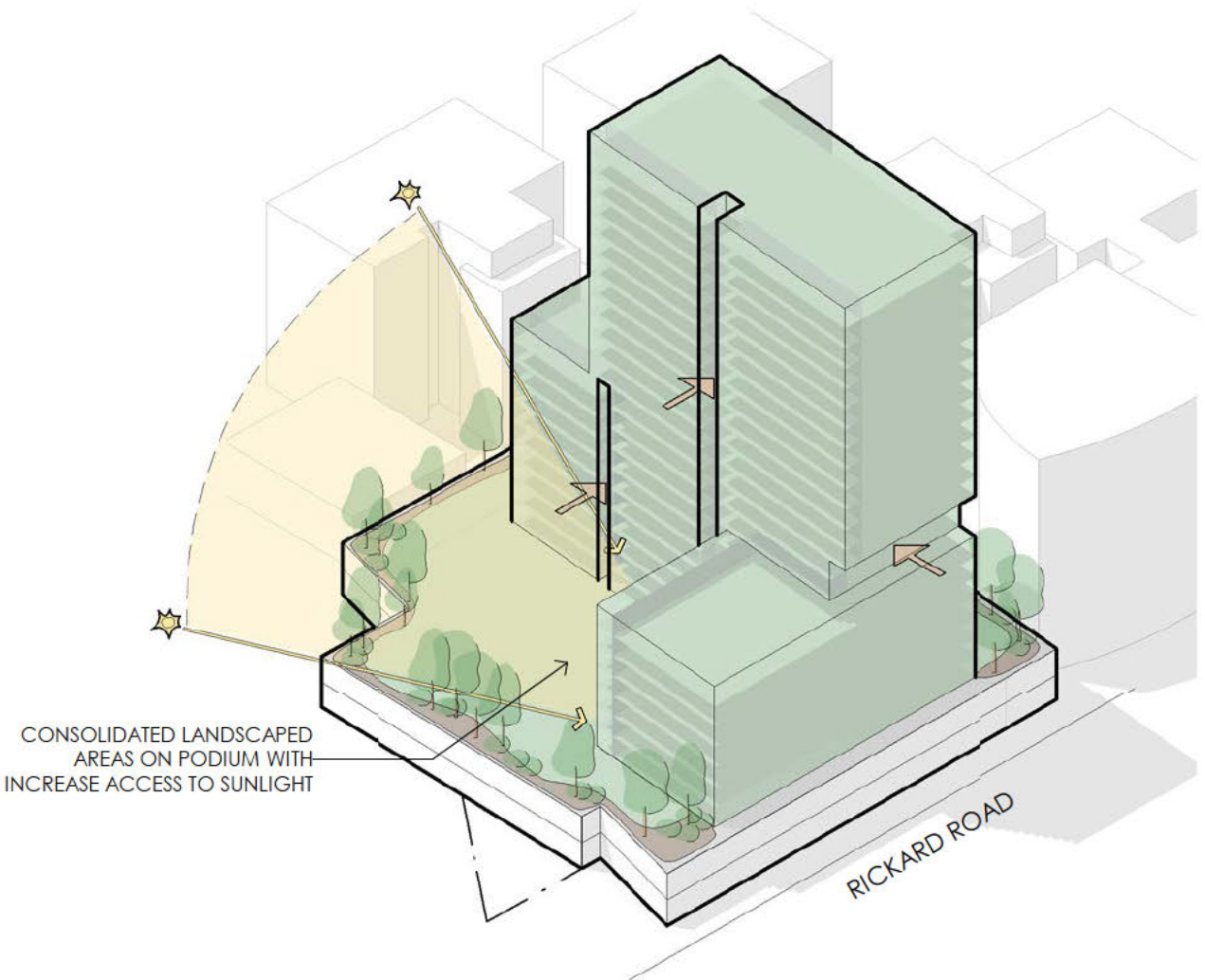
A few examples of efficient tower floorplates having building depths ranging from 22m - 25m. In these examples, they have clear corridors for ease of wayfinding, natural light to lobbies and a high level of efficiency.

ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE

CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3 As Indicated
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# 2.5 RESPONSE TO THE URBAN DESIGN FRAMEWORK

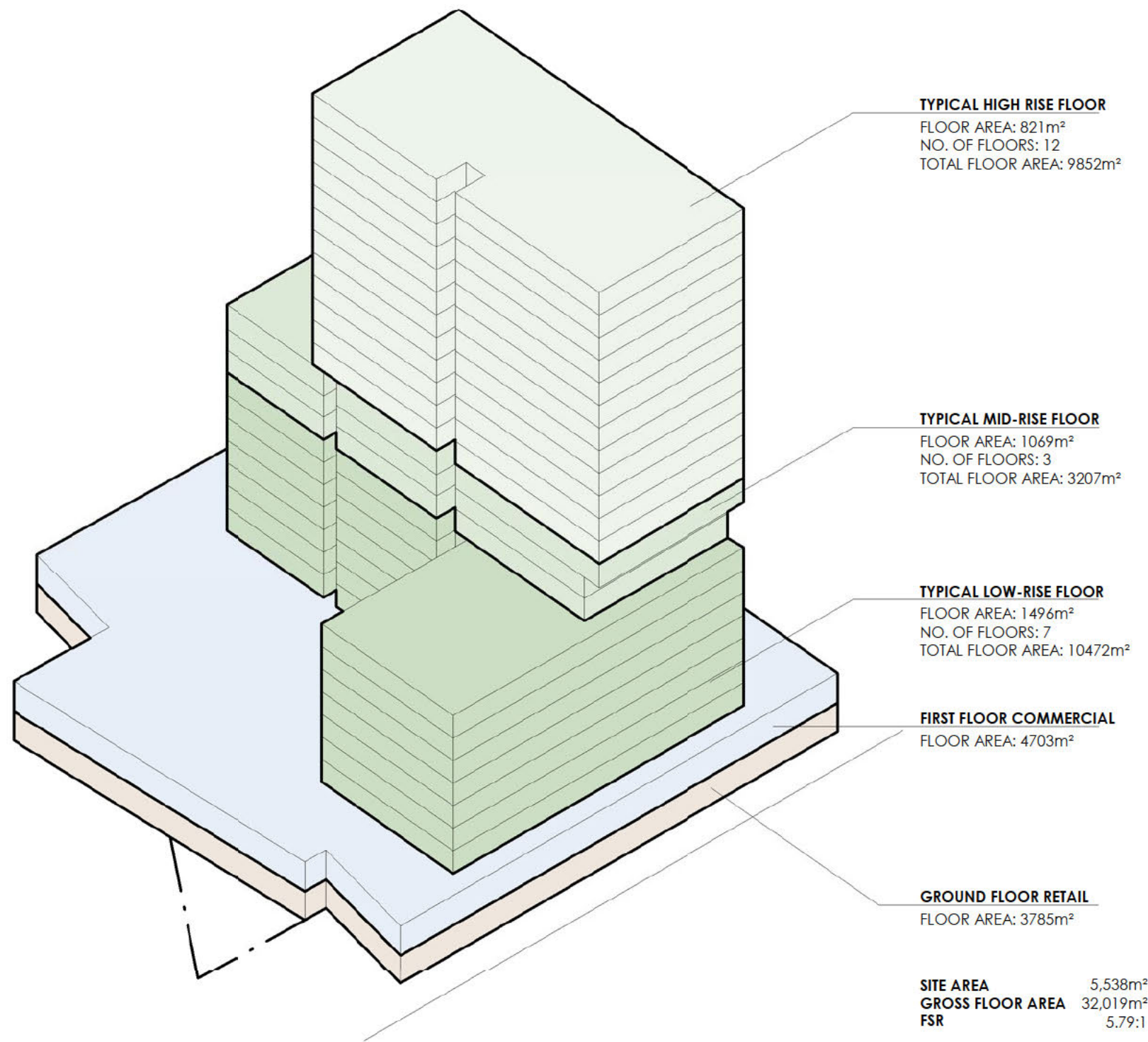


Analysis of the Urban Design Framework at 67 Rickard Road has identified a number of areas where improvements could be made. The conclusion of these views is shown in the massing diagram above, which shows a clean L-shaped built form, an increase to the commercial footprint and a consolidated podium.

ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE

CLIENT	DATE	SCALE
PROJECT	67 Rickard Rd BANKSTOWN	A3 1:100
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RESPONSE TO THE URBAN DESIGN FRAMEWORK	PV	NN
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2.6 GFA BREAKDOWN



The investigation demonstrates that a Floor to Space Ratio of 5.8:1 can be accommodated on the site. This increase is largely attributed to the expanded commercial envelope and the slight increase to the tower width. Whilst there is an increase in floor space, when the site is developed there would be very little impact as a result of the proposed amendments.

A	16/08/2024	UD RESPONSE
ISSUE	DATE	DESCRIPTION

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# 3.0 LEP AMENDMENTS

A	16/08/2024	UD RESPONSE
ISSUE	DATE	DESCRIPTION



CLIENT	DATE 16/08/2024	SCALE A3
PROJECT	67 Rickard Rd BANKSTOWN	DRAWN PV CHECKED NN
TITLE	LEP AMENDMENTS	DWG No 3.0
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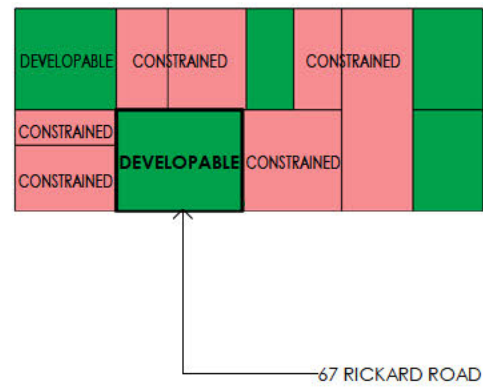
# 3.1 ATTRIBUTION PLAN

Analysis of the Urban Design Frame work at 67 Rickard Road has identified a number of areas where improvements could be made.

The culmination of these views is shown in the massing diagram on sheet 2.5, which shows a clean L-shaped built form, an increase to the commercial footprint and a consolidated podium. The resultant floor spaces is an increase in the floor to space ratio from 4.5 to 5.8:1.

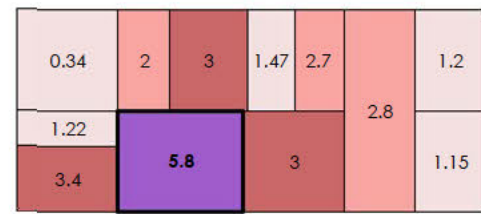
## REFERENCE SCHEME ASSUMPTION

A study of the developed and undeveloped sites within the block



## REFERENCE SCHEME AS LEP

Studies indicate that the subject site can achieve a compliant scheme FSR of 5.8:1.

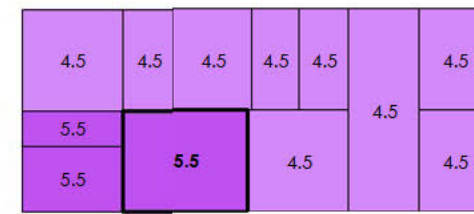


Harmonising the findings within the block.

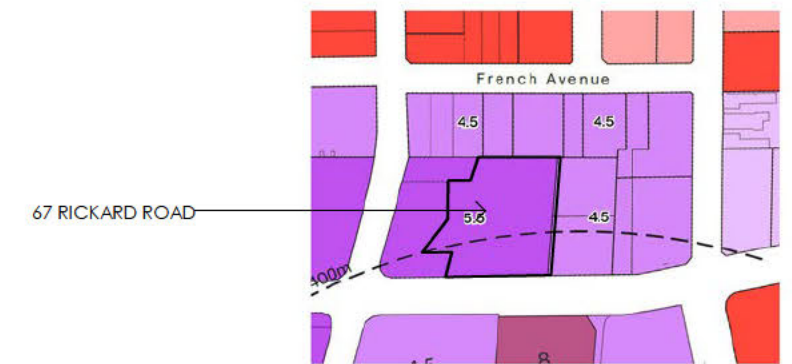
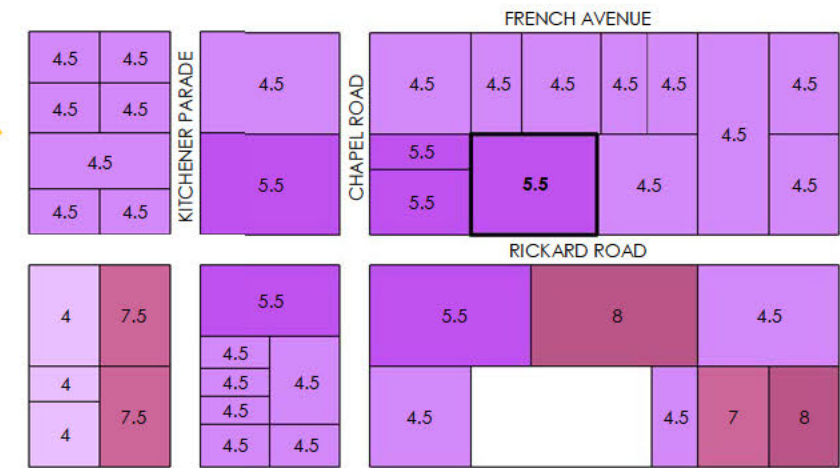


## THE ATTRIBUTION PROCESS

The best outcome for this block would be creating an FSR of 5.5 at the south-western corner, with the remaining blocks to remain at the proposed 4.5:1



Applying the block based approach using streets as delineation points and transition across blocks

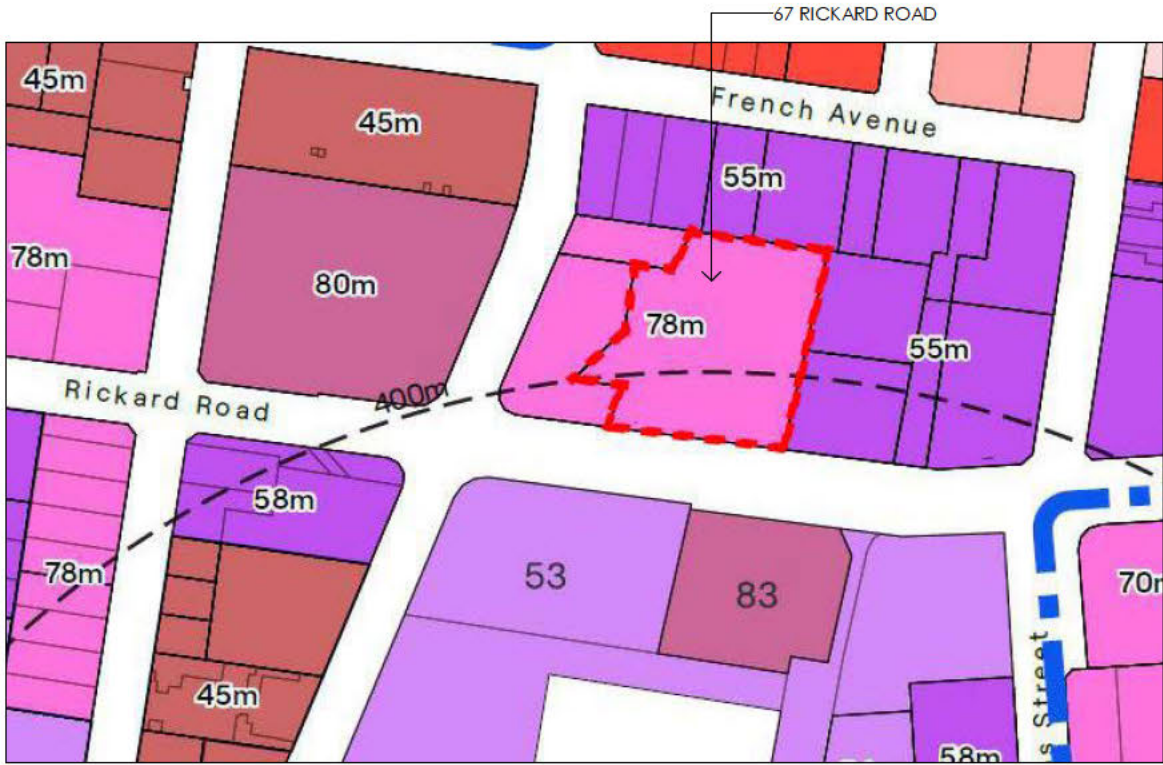


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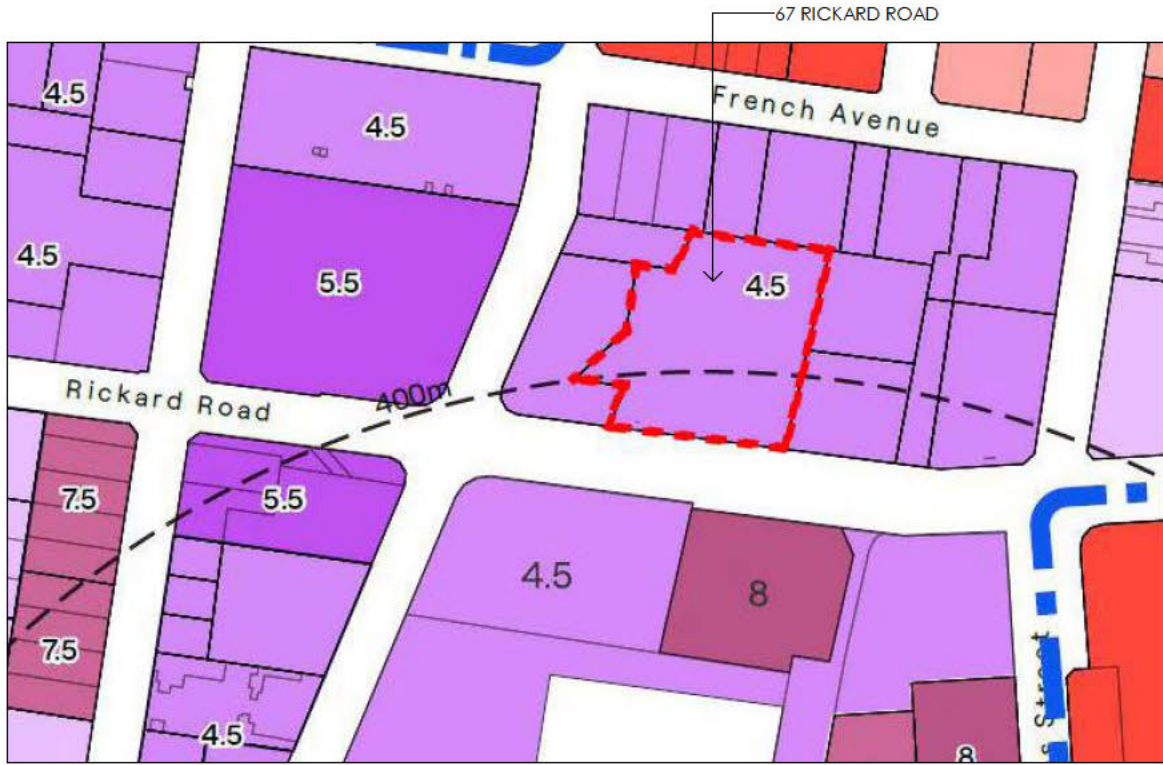
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67 Rickard Rd BANKSTOWN	DRAWN	CHECKED
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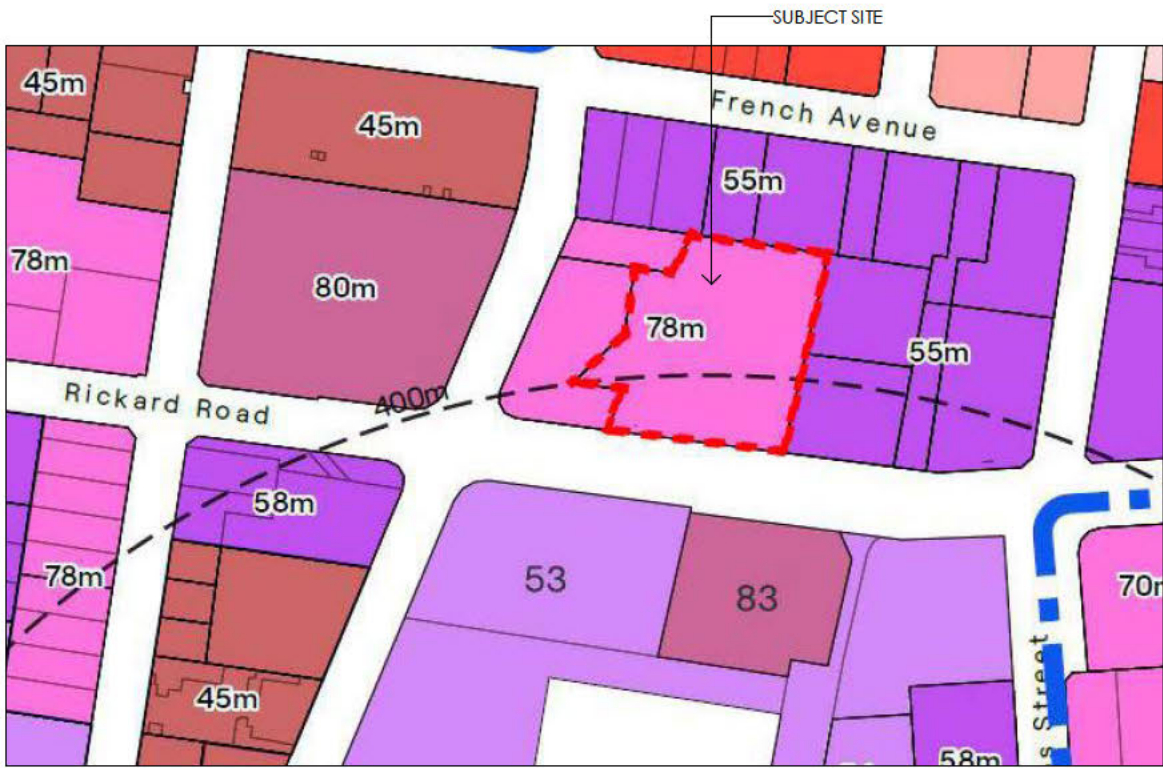
3.2 PROPOSED LEP CHANGES



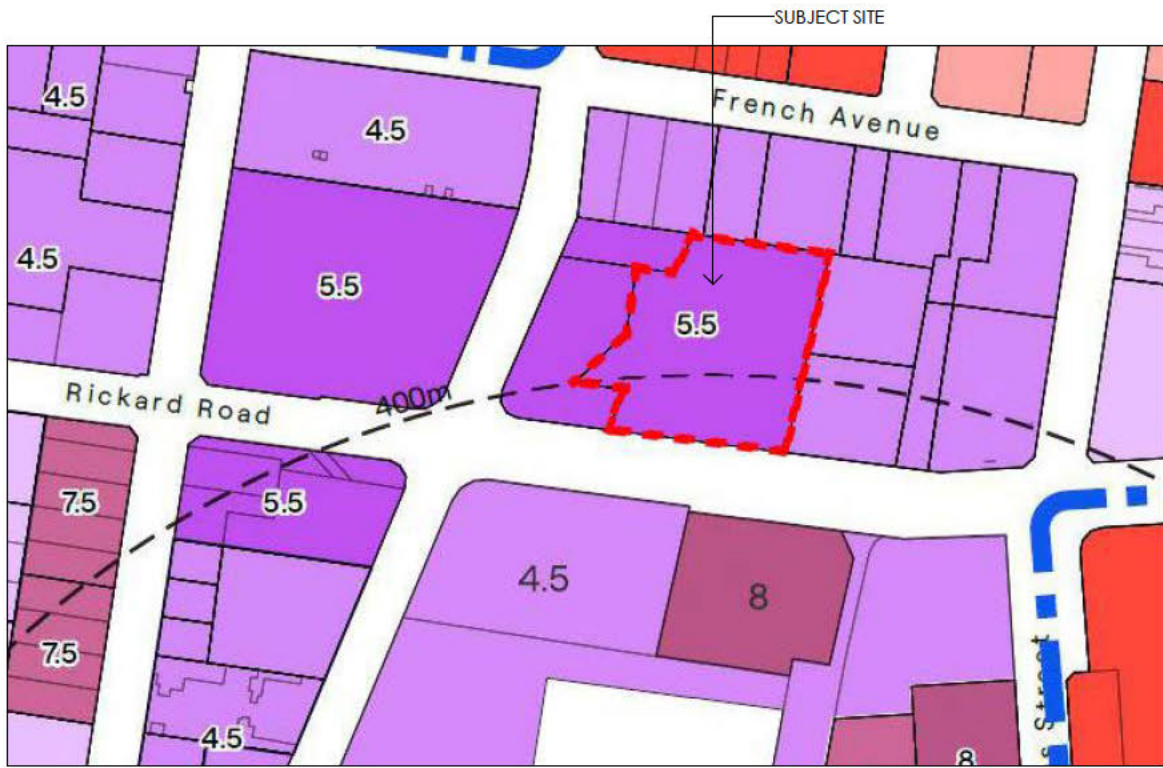
PROPOSED HOB (URBAN DESIGN REPORT)



PROPOSED FSR (URBAN DESIGN REPORT)



PROPOSED HOB (TIER ARCHITECTS)  
NO CHANGE



PROPOSED FSR (TIER ARCHITECTS)  
5.5:1

ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE



CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3
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PROPOSED LEP CHANGES	PV	NN
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## 4.0 INDICATIVE FLOOR PLANS

## INDICATIVE FLOOR PLANS

A	16/08/2024	UD RESPONSE

TIER  
ARCHITECTS

CLIENT	DATE	SCALE
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PROJECT 67 Rickard Rd BANKSTOWN	DRAWN	CHECKED
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TITLE INDICATIVE FLOOR PLANS	DWG No	1/0

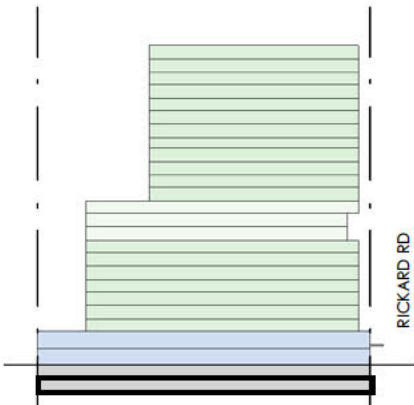
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# 4.1 BASEMENT 2 FLOOR PLAN

## RESIDENTIAL PARKING

An indicative layout of parking used for the residents.



BASEMENT 2 FLOOR PLAN

ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE

TIER  
ARCHITECTS



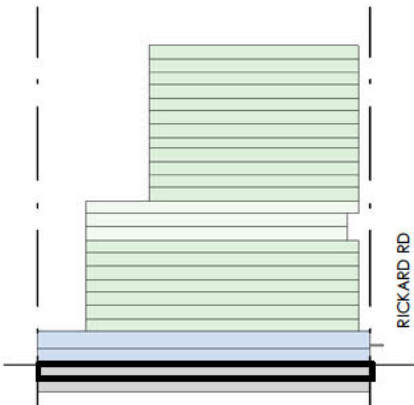
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CHECKED	NN	
TITLE	BASEMENT 2 FLOOR PLAN	
DWG No	4.1	

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# 4.2 BASEMENT 1 FLOOR PLAN

## COMMERCIAL, RETAIL AND RESIDENTIAL PARKING

Dependent on the parking requirements for commercial use, this floor will be a combination of retail including staff, and residential parking. Its use will be separated for security purposes.



BASEMENT 1 FLOOR PLAN

ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE



CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3 As Indicated
TITLE	DRAWN	CHECKED
BASEMENT 1 FLOOR PLAN	PV	NN
	DWG No	4.2
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# 4.3 GROUND FLOOR PLAN

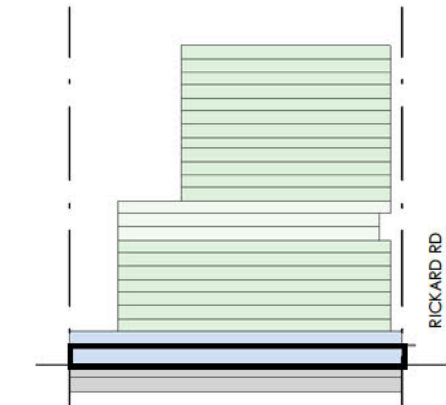
## RETAIL, LOADING BAYS

An indicative ground floor plan with a zero setback to the street.

The length of the active street front has been maximised. Retail/commercial tenancies will assist in the street activation.

Behind the street front there will be a series of different size tenancies, with the potential for small retail outlet or restaurants.

A loading dock has been provided to assist with the functionality of the future uses of the proposal.



GROUND FLOOR PLAN

ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE

**TIER**  
ARCHITECTS



CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3 As Indicated
67 Rickard Rd BANKSTOWN	DRAWN	CHECKED
	PV	NN
TITLE	DWG No	4.3
GROUND FLOOR PLAN		
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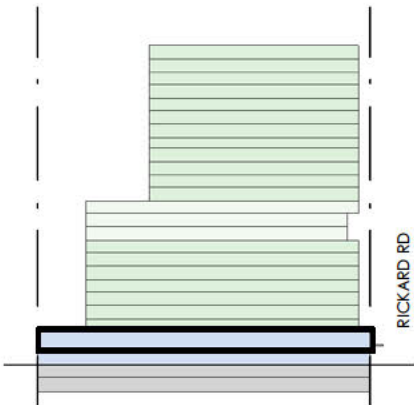


# 4.4 LEVEL 1 FLOOR PLAN

## COMMERCIAL

Level 1 commercial areas are suited for offices, either being many smaller tenants or wholly occupied by one tenant.

The large space as shown is ideal for a medical centre, which the site is currently occupied with. Other smaller commercial spaces are ideal for other health related business such as a pharmacy, pathology or allied health practices.



LEVEL 1 FLOOR PLAN

ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE

**TIER**  
ARCHITECTS



CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3 As Indicated
67 Rickard Rd BANKSTOWN	DRAWN	CHECKED
	PV	NN
TITLE	DWG No	4.4
LEVEL 1 FLOOR PLAN		
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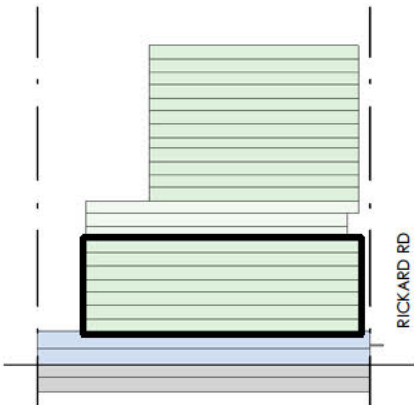
# 4.5 TYPICAL LOW-RISE FLOOR

## LEVELS 2-8 - RESIDENTIAL FLAT BUILDING

The level 2, typical low-rise level, has a 3m setback to the street matching the existing character established by 75 Rickard Road.

The building massing demonstrates ADG compliance as side and rear setbacks are of a minimum 12m. In certain situations, privacy screens may be implemented to satisfy any overlooking concerns.

An generous communal open space area on the western part of the site has been allocated which give significant opportunities for landscaping and communal activities.



TYPICAL LOW-RISE FLOOR PLAN

ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE

**TIER**  
ARCHITECTS

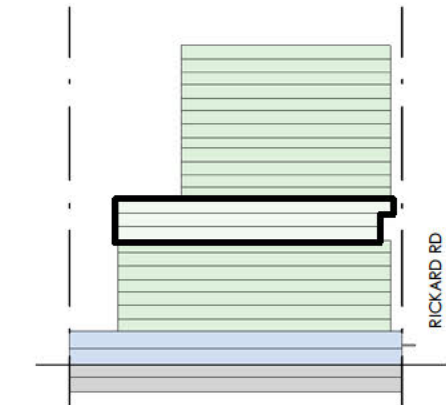


CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3 As indicated
TITLE	67 Rickard Rd BANKSTOWN	
	DRAWN PV	CHECKED NN
	DWG No	4.5
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# 4.6 FLOOR PLANS - TYPICAL MID-RISE FLOOR

LEVELS 9-11 - RESIDENTIAL FLAT BUILDING

The southern built form terminates at level 9; The indentation at the Rickard Road frontage creates a datum line which references the adjoining built forms. It also gives opportunity for communal open space set 9 storeys above Rickard Road, with views towards Paul Keating Park and Bankstown Town Centre.



1 LEVEL 10  
1 : 500

TYPICAL MID-RISE FLOOR PLAN

ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE



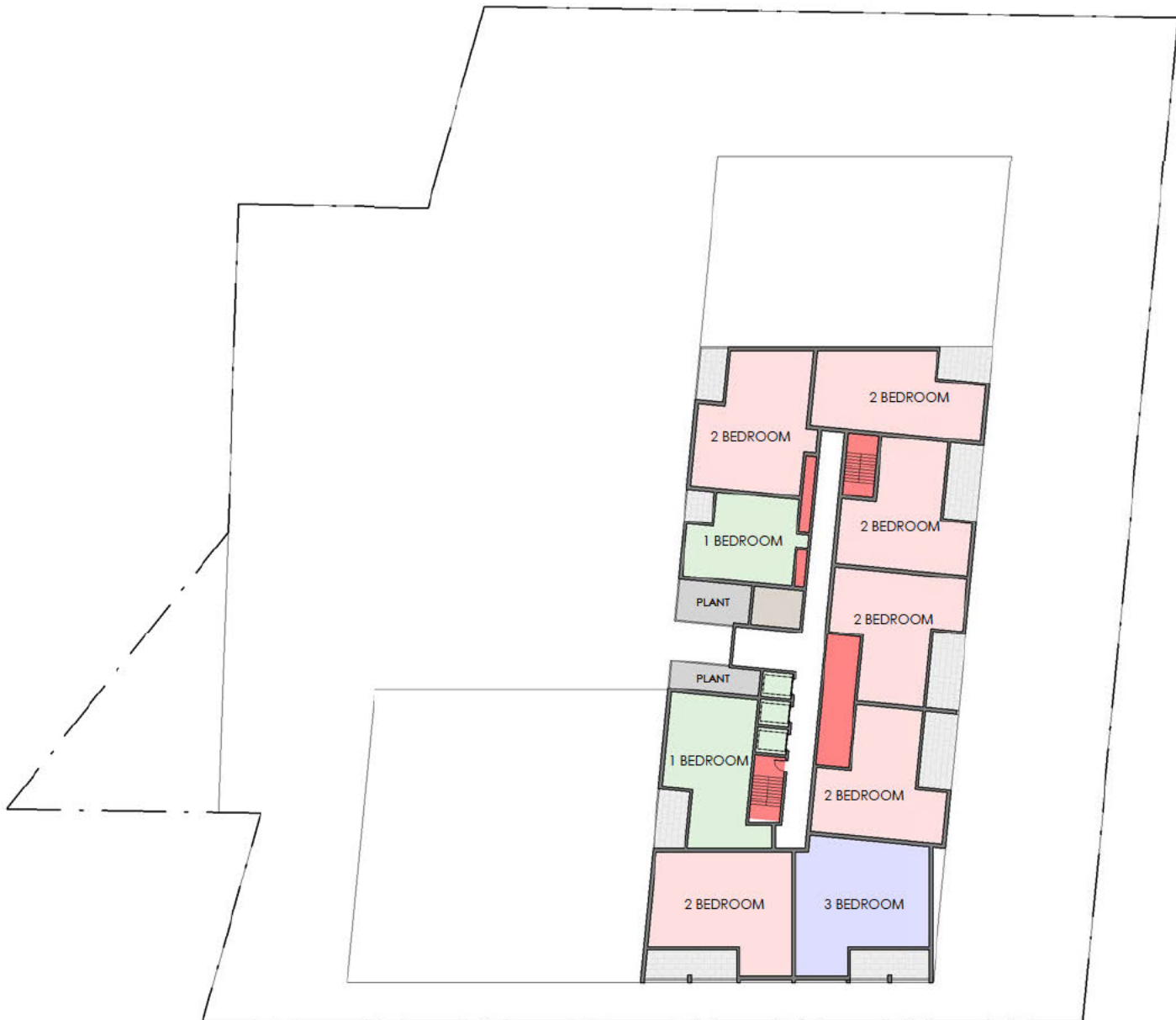
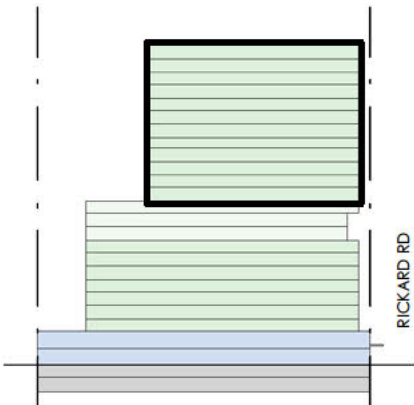
CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3 As indicated
TITLE	67 Rickard Rd BANKSTOWN	
	DRAWN PV	CHECKED NN
	DWG No	4.6
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# 4.7 FLOOR PLANS - TYPICAL MID-RISE FLOOR

LEVELS 12-23 - RESIDENTIAL FLAT BUILDING

A reduced floorplate when compared with the mid-rise levels creating a clean tower form.



TYPICAL HIGH-RISE FLOOR PLAN

ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE

TIER

ARCHITECTS

CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3 As indicated
TITLE	DRAWN	CHECKED
TYPICAL HIGH-RISE FLOOR PLAN	PV	NN
	DWG No	4.7
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# 5.0 DESIGN CONCEPTS

A	14/08/2024	LID RESPONSE
ISSUE	DATE	DESCRIPTION



CLIENT	DATE 14/08/2024	SCALE A3
PROJECT	67 Rickard Rd BANKSTOWN	DRAWN PV CHECKED NN
TITLE	DESIGN CONCEPTS	DWG No 5.0
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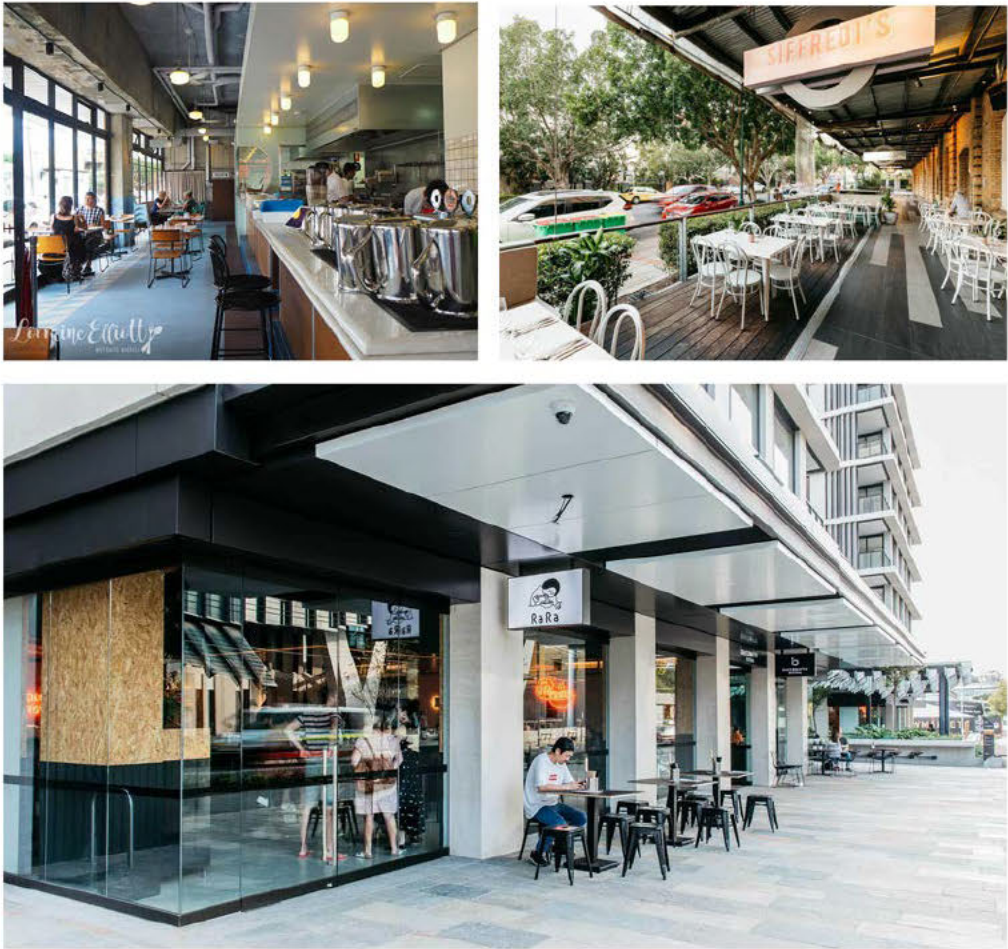


# 5.1 ACTIVE FACADE

The façade to Rickard Road is proposed to be aligned to the street boundary.

The activation of the frontage will be achieved through business or retail uses which open as close to the footpath as possible. This will enhance public security, passive surveillance and improves the amenity of the public domain by encouraging pedestrian activity. The presentation to the street also assists in supporting the economic viability of the uses.

Rickard Road is prone to flooding. This will mean at the detailed design stage, careful consideration of how to achieve the active street front will be required.



CAFES CREATING AN ACTIVE STREET



A	16/08/2024	UD RESPONSE
ISSUE	DATE	DESCRIPTION



CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3 1:1000
TITLE	DRAWN	CHECKED
ACTIVE FACADE	PV	NN
	DWG No	5.1
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# 5.2 BUILDING PODIUM AND STREET PRESENTATION

The presentation of the built form to Rickard Road is an important consideration. Datum lines have been established based on the existing character presented at 75 Rickard Road.

A two-storey podium with commercial uses presents an active street front.

The proposal then uses the established street wall height presented by the neighbouring-built form define the extent of the Midrise portion of the building.

Referencing the termination of the existing neighbouring building, a visually recessive level along with a setback to the western side creates a visual break as well as a suitable transition to the neighbouring-built form.

The tower form will be modulated through the use of changes in material along with breaks in the building mass. The reference images show successful way of breaking down building mass.

BUILDING MODULATION



PUBLIC ART



RECESSED UPPER FLOOR BUILT FORM

PLANTER BOXES FOR ADDITIONAL GREEN OUTLOOK



ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE



CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3 1:1000
TITLE	DRAWN	CHECKED
	PV	NN
	DWG No	5.2
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# 5.3 INTERNAL SHOPPING STREET AND MEDICAL CENTRE

Within the ground floor plane is an internal shopping street. With varying widths, this double height space adds to the retail concentration on the site. Throughout the space people always have a connection to the sky through the glazed atrium roof above. The shopping street will have glazed operable doors to close off the space when the weather is unfavourable.

At the centre of the street is the hub space where people will find larger format shops and vertical circulation. The medical centre Level 1 benefit from looking into this space allowing it to be visually connected to the ground plane.

GROUND FLOOR INTERNAL SHOPPING STREET



ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE



CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3 1:1000
TITLE	DRAWN	CHECKED
	PV	NN
	DWG No	5.3
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# 5.4 RESIDENTIAL COMMUNAL OPEN SPACES

The enlarged commercial footprint allows for 2000m<sup>2</sup> of open space suitable for a variety of outdoor activity. Due to its orientation and the building design, this area will recieve good solar access.

COMMUNAL OPEN SPACES



ROOFTOP COMMUNAL OPEN SPACE



A	16/08/2024	UD RESPONSE
ISSUE	DATE	DESCRIPTION

CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3 1:1000
TITLE	DRAWN	CHECKED
67 Rickard Rd BANKSTOWN	PV	NN
RESIDENTIAL COMMUNAL OPEN SPACES	DWG No	5.4
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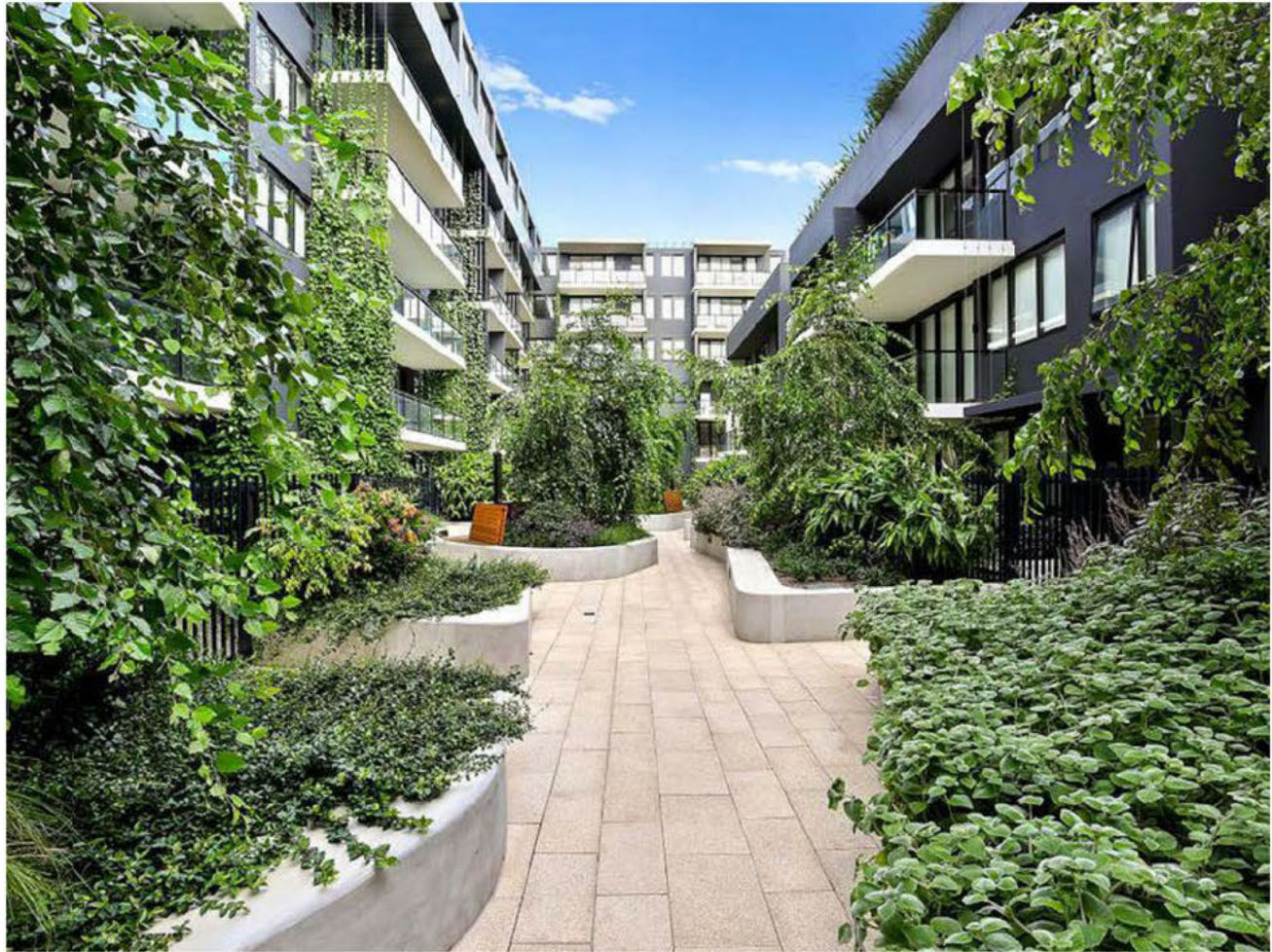


# 5.5 GREEN BUILDING

The proposal will create a green, active built form that will promote life on the street and communal spaces.

The nature of the proposed communal open space is fluid and natural providing a lush edge to the buildings and an area for recreation.

The landscaped character of these areas will help to achieve the minimum 50% site area green cover as identified in the Urban Design Framework.



LANDSCAPING ON HORIZONTAL AND VERTICAL PLANES

ISSUE	DATE	DESCRIPTION
A	16/08/2024	UD RESPONSE



CLIENT	DATE	SCALE
PROJECT	16/08/2024	A3 1:1000
TITLE	DRAWN	CHECKED
	PV	NN
	DWG No	5.5
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**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 12:56:11 PM

---

Submitted on Tue, 27/08/2024 - 12:55

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Faisal

### **Last name**

Shad

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Submission**

Dear DPHI,

Upon reviewing the Masterplan, I believe that the current density levels are insufficient to meet future needs and to support sustainable growth, and more is needed from the proposed 12,500 number.

The existing shopping centres in Bankstown are vital hubs for local commerce, providing essential goods and services to the community. Higher density around these centres would increase foot traffic, enhancing their economic viability and ensuring their continued success. Increased residential density would help sustain a variety of retail and service offerings, as businesses would have a larger customer base. This economic boost is essential for maintaining a vibrant local economy and preventing the decline of retail options due to underuse. A denser population would also foster a more dynamic local economy, potentially attracting new businesses and investment.

Higher density living leads to increased local spending, as residents are more likely to

spend their disposable income in nearby businesses. This economic activity supports local job creation and contributes to the overall prosperity of the area. Businesses located in high-density areas benefit from a larger customer base, leading to greater revenue and stability. This can also encourage further investment in the area, fostering a cycle of economic growth and development that benefits the entire community.

Increased density facilitates mixed-use development, where residential, commercial, and recreational spaces are integrated within the same area. This approach promotes vibrant, active communities where residents can live, work, and play without needing to travel long distances. Mixed-use developments can enhance the overall quality of life by providing convenient access to essential services and fostering a sense of community.

The recent announcement of a new hospital in the Bankstown area represents a significant improvement in local healthcare infrastructure. However, to maximise the benefits of this development, it is imperative that we increase residential density near the hospital. Higher density around the hospital would ensure that more residents are within close proximity to healthcare services, which is particularly beneficial for those with chronic health conditions or urgent medical needs. Inadequate density could lead to suboptimal utilisation of the hospital facilities and undermine the goal of improving local health outcomes. Furthermore, increased density would support the viability of public transport options connecting the hospital with other parts of Bankstown, reducing congestion and ensuring that healthcare services are accessible to a broader segment of the population.

Thank you for considering my objection. I look forward to your response and hope for a revised plan that addresses these critical concerns.

Yours faithfully,  
Faisal Shad

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 2:11:58 PM

---

Submitted on Tue, 27/08/2024 - 14:11

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Marwan

### **Last name**

Jaber

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I object to it

### **Submission**

Dear DPHI,

I am writing to formally object to the Bankstown TOD proposal due to significant concerns regarding the proposed density. I believe the current density levels are inadequate, particularly in relation to the newly announced hospital and existing shopping centres and the commercial district.

Higher density living increases local economic activity by providing a larger customer base for businesses. Residents living in close proximity to shops, restaurants, and other services are more likely to spend their money locally. This can stimulate local economies, support job creation, and attract further investment into the area.

A thriving local economy is essential for maintaining community services and



infrastructure. Increased density supports a dynamic economic environment, making Bankstown a more attractive place for businesses and investors. This economic boost can have a ripple effect, leading to broader community benefits and enhanced quality of life.

The existing shopping centres in Bankstown are crucial for local commerce, providing a range of goods and services. Higher residential density in the areas surrounding these centres would lead to increased foot traffic, which is vital for the economic health of these businesses. A larger customer base can support a diverse range of retail and service options, preventing the decline of these centres due to reduced patronage.

Increased density would also encourage the development of new businesses and investment in the area, as higher population levels make commercial ventures more viable. This can create a more vibrant and economically resilient community, reducing the risk of retail vacancies and supporting local employment opportunities. Without adequate density, shopping centres may struggle to sustain their operations and services, adversely impacting the local economy.

The recent announcement of a new hospital in Bankstown is a major development for the community, offering enhanced healthcare services. However, to maximise the utility of this facility, it is essential that we increase residential density nearby. Higher density in the vicinity of the hospital would ensure that a larger number of residents have convenient access to medical services. This proximity is particularly beneficial for those with ongoing health issues or emergencies. Insufficient density could lead to underutilisation of the hospital, making it less effective in addressing local healthcare needs.

Furthermore, increased density around the hospital would support the integration of healthcare services with other community amenities. This can enhance patient outcomes by reducing travel time and ensuring that health services are easily accessible. Additionally, a denser population would justify the expansion of public transport routes to the hospital, further improving access and reducing the strain on local roads.

Higher density development can lead to the creation of more local employment opportunities. As businesses and services expand to cater to a larger population, new job openings are generated within the community. This can reduce the need for residents to commute long distances for work and contribute to a more balanced and equitable job market.

Local employment opportunities also support economic stability and growth within the community. By increasing density, we can encourage business development and job creation, contributing to a more resilient and thriving local economy.

I urge DPHI to reconsider the density provisions and adjust the Masterplan to ensure it supports sustainable growth and meets the future needs of Bankstown residents.

Regards,  
Marwan Jaber

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 4:40:56 PM

---

Submitted on Tue, 27/08/2024 - 16:40

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Sayyah

**Last name**

Khalil

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Yagoona

**Please provide your view on the project**

I object to it

**Submission**

Dear DPHI,

The Bankstown TOD proposal's current density levels appear to underestimate the potential benefits that increased residential density could bring to the area. With substantial investments being made in healthcare and retail infrastructure, it is critical that the surrounding residential areas are developed to support and enhance these facilities. The density provisions outlined in the plan, as they stand, may undermine the effectiveness of the new hospital and fail to provide the necessary support for the local shopping centres, potentially leading to underutilisation of these key assets.

Higher density living generates more local spending, which supports businesses and stimulates economic activity. Residents in high-density areas are more likely to shop locally, dine out, and use nearby services, which contributes to the financial health of

businesses in the area. This increased economic activity can lead to job creation and attract further investment into the community.

A thriving local economy benefits from a larger and more stable customer base. By increasing density, Bankstown can foster a more robust commercial environment, reducing the risk of business closures and ensuring that essential services remain available to residents.

Existing shopping centres in Bankstown are vital economic and social hubs. Increasing density in their vicinity would result in higher foot traffic, which is crucial for the viability of these centres. A larger residential base ensures a steady stream of customers, which can help sustain diverse retail and service offerings. Without sufficient density, these shopping centres may struggle to attract and retain businesses, potentially leading to a decline in available services and a decrease in the vibrancy of the local commercial environment.

Additionally, higher density can stimulate economic activity by supporting new businesses and services. As the residential population grows, it becomes more feasible for a broader range of shops, restaurants, and entertainment options to operate profitably. This, in turn, enhances the overall economic health of Bankstown and supports local job creation.

The recent announcement of a new hospital in Bankstown represents a substantial investment in local healthcare. To fully capitalise on this development, it is essential that we increase residential density in the surrounding areas. Higher density will ensure that more residents are within close proximity to the hospital, facilitating quicker access to medical care, particularly for those with chronic conditions or emergencies. With the current density levels, the hospital's accessibility may be compromised, leading to increased travel times for residents who live further away.

Moreover, increased density around the hospital can support integrated healthcare services, potentially leading to the development of complementary facilities such as medical clinics and pharmacies. This creates a healthcare hub that can serve a larger population more efficiently, improving overall health outcomes and reducing the burden on other healthcare facilities in the region.

Planning for higher density is essential for supporting long-term economic viability and growth. As the population increases, higher density provides the foundation for sustained economic development and ensures that infrastructure and services can scale accordingly.

A forward-thinking approach to density supports the long-term success and prosperity of Bankstown. By accommodating future population growth within a well-planned framework, we can create a resilient and thriving community that is well-equipped to handle future challenges and opportunities.

In conclusion, the proposed density levels in the Bankstown Rezoning Masterplan are inadequate to meet the needs of the community, particularly in relation to the new hospital and existing shopping centres.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 4:59:43 PM

---

Submitted on Tue, 27/08/2024 - 16:59

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Aaminah

### **Last name**

Jamail

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I am just providing comments

### **Submission**

I wish to object the Bankstown TOD rezoning proposal in its current form. The Bankstown area is rapidly evolving, and with a growing population, there is an urgent need to ensure that our planning strategies align with these demographic shifts. The current masterplan's density proposals fall short in several crucial ways.

High-density areas are ideal for mixed-use developments, which combine residential, commercial, and recreational spaces. This integration creates dynamic neighbourhoods where people can live, work, and play in close proximity, reducing the need for lengthy commutes and fostering a sense of community. Mixed-use developments are also more energy-efficient and environmentally friendly.

A higher density approach can lead to a broader range of housing options, including more affordable units. By building up rather than out, the cost of land can be spread across more

housing units, potentially lowering the price per unit. This strategy can address housing shortages and provide more affordable living options for a diverse range of income levels.

Local businesses benefit from higher population densities as they can attract more customers and thrive in a bustling environment. Increased density around shopping centres and commercial hubs supports a diverse range of businesses, from small retail shops to larger enterprises. This economic activity is essential for a vibrant local economy.

Higher density development near the metro station will encourage more residents to use public transportation rather than relying on private vehicles. This shift can alleviate road congestion, reduce travel times, and lower carbon emissions. Dense urban areas foster walkability and better public transit use, contributing to a more sustainable transport network. Without adequate density, the new metro station may not achieve its full potential in reducing local traffic issues.

The construction of a new hospital and a metro station represents a significant public investment. To maximise the return on this investment, it is essential that the surrounding areas experience higher density development. Increased residential and commercial density will ensure that these infrastructures are utilised efficiently and that their benefits are fully realised. A lower density plan risks underutilising these valuable assets, which could lead to a wastage of resources and missed opportunities for community enhancement.

Increased density contributes to a more vibrant urban life by supporting a variety of cultural, recreational, and social activities. Areas with higher population density tend to have more cafes, restaurants, and entertainment options, creating a lively and engaging atmosphere. This vibrancy enhances the overall appeal of the neighbourhood and attracts new residents and visitors.

In conclusion, the current rezoning masterplan for Bankstown does not adequately address the need for increased density around the new hospital, metro station, and shopping centres. I urge DPHI to revise the plan to incorporate higher density provisions, which will optimise the use of infrastructure, support economic and social growth, and enhance the overall quality of life for residents. Thank you for considering this critical aspect of urban planning.

Kind Regards,  
Aaminah



**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 5:06:57 PM

---

Submitted on Tue, 27/08/2024 - 17:06

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Shakur

**Last name**

Naim

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Chester Hill

**Please provide your view on the project**

I object to it

**Submission**

Dear Department Officer,

I hope this message finds you well.

I am writing to express my concern and formally object to the proposed Bankstown TOD Rezoning Masterplan. After reviewing the details of the masterplan, it is clear that the proposed density is insufficient to meet the future needs of the area.

Local businesses thrive in high-density areas where there is a larger customer base and increased foot traffic. By planning for greater density around shopping centres and commercial areas, the masterplan can support the viability and growth of local businesses. This economic activity contributes to a vibrant and dynamic urban environment.

Additionally, higher density can lead to a more diverse range of businesses and services, providing residents with greater choice and convenience. This variety is beneficial for both consumers and businesses, as it fosters competition and innovation. Supporting local businesses through increased density is a key aspect of building a robust local economy.

Higher density development can play a key role in improving housing affordability by increasing the supply of available housing units. In areas with high demand for housing, such as those near new infrastructure, increasing density can help alleviate pressure on the housing market and provide more affordable options for residents. This is particularly important given the current housing affordability crisis in many urban areas.

By expanding the range of housing options through increased density, the masterplan can cater to a wider demographic, including lower-income households. This approach can contribute to a more inclusive community where housing is accessible to people across different income levels. Ensuring affordability is a critical component of equitable urban development.

The substantial public investment in the new hospital and metro station necessitates a corresponding increase in nearby residential and commercial density. By concentrating development around these assets, we can ensure that they are used to their fullest potential, justifying the investment and enhancing the community's return on this expenditure. Without sufficient density, these facilities might underperform, leading to a misallocation of valuable resources.

Additionally, the efficient use of public investments can stimulate further development and attract additional funding. Higher density ensures a steady flow of patrons and users for the hospital and metro station, which can help in securing ongoing operational funding and supporting further infrastructure improvements. This synergy between infrastructure and development is crucial for sustainable urban growth.

High-density development fosters a robust local economy by increasing foot traffic to shopping centres and businesses. When more residents live close to these commercial hubs, it drives demand for goods and services, encouraging business growth and creating job opportunities. This economic activity benefits the broader community by supporting a diverse range of retail and service providers.

Moreover, businesses located in high-density areas often experience reduced operational costs due to the proximity to customers. This localisation of services and amenities can lead to more competitive pricing and greater variety for consumers, further enhancing the economic vitality of the area. Planning for higher density is therefore essential for supporting a thriving local economy.

In light of these considerations, I urge the Department to revisit and revise the density provisions in the masterplan. A more ambitious approach would better align with the future needs of the community and contribute to a more sustainable and prosperous Bankstown.

Shakur Naim

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 5:18:13 PM

---

Submitted on Tue, 27/08/2024 - 17:17

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Sanem

### **Last name**

Karaca

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I object to it

### **Submission**

Dear DPHI,

I am writing to express my concerns and formally object to the proposed Bankstown Rezoning Masterplan. After reviewing the plan, it is evident that the proposed density is insufficient to address the future needs of the area.

Higher density development can help address housing affordability issues by increasing the supply of housing units. In high-demand areas, such as those near new infrastructure, increased density can alleviate pressure on the housing market and provide more affordable options for residents. This is particularly important given the ongoing housing affordability challenges in many urban areas.

By expanding the range of housing options through increased density, the masterplan can

cater to a broader demographic, including lower-income households. This approach promotes a more inclusive community where housing is accessible to people across different income levels.

Higher density development near the metro station can significantly reduce reliance on private vehicles, thereby alleviating road congestion. Dense residential and commercial areas foster greater use of public transport, which is essential for managing traffic flow and reducing travel times. Effective density planning ensures that the metro station is fully utilised, helping to ease traffic pressures throughout the region.

Additionally, reduced vehicle dependence lowers the environmental impact associated with transportation, such as greenhouse gas emissions and air pollution. By encouraging more sustainable transport options through increased density, the masterplan can contribute to a healthier urban environment and improved quality of life for residents.

Dense urban environments are ideal for mixed-use developments, which combine residential, commercial, and recreational spaces. This integration promotes a more dynamic and functional urban environment, where residents can live, work, and play in close proximity. Mixed-use developments reduce the need for long commutes and enhance overall community cohesion.

Mixed-use areas also support sustainable urban growth by optimising land use and reducing the environmental impact of development. By planning for higher density, the masterplan can create more efficient and resilient urban spaces that contribute to a more cohesive and sustainable community.

The proximity of higher density housing to the new hospital ensures better access to healthcare services for residents. Shorter travel distances mean quicker emergency response times and easier access to medical appointments, which is crucial for community health. This improved accessibility can lead to better health outcomes and more efficient use of healthcare resources.

Moreover, integrating higher density development with healthcare infrastructure can enhance the overall effectiveness of health service delivery. A concentrated population allows the hospital to optimise its services and resources, leading to a more responsive and capable healthcare system.

The substantial public investments in the new hospital and metro station require a corresponding increase in local density to ensure these assets are fully utilised. High-density development around these key facilities maximises their effectiveness and justifies the financial outlay. Without sufficient density, these infrastructure projects risk being underutilised, leading to a suboptimal return on investment and diminished benefits for the community.

Investing in higher density areas around these facilities can also attract additional public and private investment, creating a positive feedback loop that supports further development and improvements. This alignment ensures that the new infrastructure contributes meaningfully to the area's growth and sustainability, rather than serving as isolated assets.

Thanks and I urge the Department to reconsider the plan and incorporate higher density provisions to better utilise these strategic assets and enhance the overall livability of the area.

Regards,  
Sanem

**I agree to the above statement**  
Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 8:04:52 PM

---

Submitted on Tue, 27/08/2024 - 20:04

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

### First name

Tina

### Last name

Raked

### I would like my name and personal contact details to remain confidential

Yes

## Info

### Email

[REDACTED]

### Suburb/Town & Postcode

2199

### Please provide your view on the project

I object to it

### Submission

I OBJECT to the rezoning of Bankstown.

1. Bankstown is an overpopulated community with far too many people for a small area, causing traffic congestion on the roads and streets. This results in an increase in traffic accidents and community road anger.
2. There will not be enough parking for residents and visitors due to overpopulation. This includes residential street parking, shopping centre parking, parking near public transportation, hospitals, doctors etc. Making it very difficult for people to go to medical appointments or complete daily duties such as shopping, going to school and so-on
3. The roads and infrastructures are poorly managed and maintained by the council, including increased potholes, uneven and unkept footpaths, terrible storm sewer systems (flooding), shopping centres and parking. Rezoning Bankstown will exacerbate all these current issues.
3. There are increased rubbish and littering on the roads, streets and retail spaces, the town

looks disgusting and even smells terrible from all the garbage left on the streets.

4. There will be increased air pollution, water pollution, litter, noise pollution, light pollution in the area and suburb

5. Increased crime rates will occur

6. The building of UNITS need to stop, there is way too much congestion!

7. The increase number of cars on the road and the number of people living in Bankstown will lead to higher temperatures, particularly in the summer. We don't need more residents in the area, as rising temperatures will make it harder for residents to pay their electricity bills and put further strain on AUSGRID.

8. Bankstown needs more parks and greenery to bring joy to the community rather than more buildings

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 11:44:40 PM

---

Submitted on Tue, 27/08/2024 - 23:44

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Ashraf

### **Last name**

Wahab

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I object to it

### **Submission**

Dear DPHI,

I wish to provide comment on the new Bankstown TOD rezoning. The proposed density levels appear insufficient given the substantial investments and infrastructure developments in the region. This oversight could significantly undermine the potential benefits of these projects and hinder the overall growth and sustainability of Bankstown.

The new hospital, recently completed metro station, and the expansion of commercial and shopping centres present a unique opportunity for transformative urban development. These infrastructure investments are intended to drive economic growth, enhance accessibility, and improve the quality of life for residents. To fully realise these benefits, it is crucial that the rezoning plan incorporates a density strategy that aligns with these developments.

The establishment of a new hospital and metro station is expected to create numerous job opportunities. However, the benefits of these new jobs will not be fully realised unless there is sufficient residential density nearby. Higher density housing in the vicinity of these facilities will ensure a larger, local workforce is available, contributing to economic activity and reducing the need for lengthy commutes. This will also support the local economy by creating a robust consumer base for nearby businesses.

The success of new commercial centres and existing shopping areas is closely tied to the volume of foot traffic and customer activity. By increasing residential density in these areas, we can drive more consumer traffic, which is vital for the profitability and viability of local businesses. This will also contribute to a lively, economically vibrant urban environment that benefits both residents and business owners.

Increasing density in strategic areas helps to prevent urban sprawl, which can lead to inefficient land use and greater environmental impact. By concentrating development around existing infrastructure, we support more sustainable urban growth. This approach reduces the need for expansive new developments, preserves green spaces, and supports a more compact, energy-efficient urban form.

Investors are more likely to commit to areas with higher density and well-planned infrastructure. By increasing density around key developments, Bankstown can become a more attractive location for investment in both residential and commercial properties. This influx of investment will further stimulate economic growth and contribute to the overall revitalisation of the area.

The Bankstown Rezoning Masterplan must be revisited to address these critical concerns. Thank you for your attention to this matter. I look forward to your response.

Ashraf Wahab

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 11:51:24 PM

---

Submitted on Tue, 27/08/2024 - 23:51

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Majed

### **Last name**

Jaffer

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Yagoona

### **Please provide your view on the project**

I object to it

### **Submission**

Attention DPHI Assessment Team,

I am writing to formally object to the Bankstown TOD Rezoning Masterplan as currently proposed. After thorough examination, The current density levels proposed are insufficient to harness the full potential of these significant developments, which risks undermining the strategic benefits intended for the region.

The recent investments in infrastructure, including the new hospital, metro station, and commercial centres, are set to transform Bankstown into a more vibrant and accessible hub. To fully leverage these developments and to ensure that they contribute positively to the community and economy, it is crucial that the density around these key areas is substantially increased.

The new hospital and commercial centre are poised to generate significant economic activity and job creation. To fully capitalise on these opportunities, the surrounding area needs increased residential density. Higher density will ensure that a larger portion of the workforce can live nearby, reducing commute times and supporting local businesses. This local workforce will also contribute to the economic vitality of the area, reinforcing the benefits of these investments.

The soon-to-be-built metro station represents a major improvement in public transport infrastructure. To make this investment viable, it is essential to increase density in its vicinity. Higher residential density will lead to greater use of the metro service, thus improving its efficiency and reducing reliance on private vehicles. This will help mitigate traffic congestion and support sustainable urban transport solutions.

Higher population density can lead to better funding for community infrastructure, including parks, recreational facilities, and cultural amenities. With more residents living in proximity to these services, there will be a stronger case for investing in their development and maintenance. This will enhance the overall quality of life and create a more attractive living environment.

Higher density development makes more efficient use of land and reduces the need for additional land acquisition. By focusing development around existing infrastructure, we ensure that land is used responsibly and avoid the expansion of urban areas into green spaces. This approach aligns with modern urban planning practices and supports responsible land management.

Areas with higher density and well-developed infrastructure are more attractive to investors. By increasing density around the hospital, commercial centre, and metro station, Bankstown can become a more appealing location for investment. This influx of investment will further stimulate economic growth and enhance the area's overall development.

I strongly urge the Department to reconsider the density proposals and ensure they align with the strategic vision for Bankstown's development.

Regards,  
Majed Jaffer

**I agree to the above statement**  
Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 11:22:09 AM

---

Submitted on Wed, 28/08/2024 - 11:21

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2199

**Please provide your view on the project**

I object to it

### **Submission**

Bankstown is over populated there is no need to rezone anything it takes already 20min to get from one side to the other side of Bankstown.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:10:38 PM

---

Submitted on Wed, 28/08/2024 - 12:10

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Ganga

**Last name**

Raya

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2131

**Please provide your view on the project**

I support it

**Submission**

Lack of affordable housing for international student is another significant problem in Australia. I felt like as an international students I have to face more problems in terms of getting a unit to rent. So I really think that government should really initiate to make it more inclusive for international students in terms of application and marking criteria of agent for renting a unit to a international students.

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:11:26 PM

---

Submitted on Wed, 28/08/2024 - 12:09

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Iman

**Last name**

Moussa

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Liverpool

**Please provide your view on the project**

I support it

**Submission**

More affordable housing in NSW.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:11:40 PM

---

Submitted on Wed, 28/08/2024 - 12:11

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Jesujanah Jaim

### **Last name**

Lopoz

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown 2200

### **Please provide your view on the project**

I object to it

### **Submission**

Struggling to secure a better future if basic necessities are not secure

### **I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:11:50 PM

---

Submitted on Wed, 28/08/2024 - 12:11

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Revesby 2212

**Please provide your view on the project**

I object to it

### **Submission**

With a family it has become difficult to find affordable housing in Bankstown. I support a 15% affordable housing of new developments. This is important to ensure our family can remain in the Bankstown area and not move out.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:12:18 PM

---

Submitted on Wed, 28/08/2024 - 12:11

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2770

**Please provide your view on the project**

I object to it

**Submission**

I am living in a hardship with rental for 25 years ,

Please do something with this submission and take it seriously and make it 15%.

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:12:41 PM

---

Submitted on Wed, 28/08/2024 - 12:11

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Greenacre

**Please provide your view on the project**

I object to it

**Submission**

Asking for a minimum of 15% affordable housing

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:12:46 PM

---

Submitted on Wed, 28/08/2024 - 12:11

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2560

**Please provide your view on the project**

I object to it

### **Submission**

i live somewhere else because i can't afford to live in bankstown, i wish to live in bankstown. i need 15% affordable housing

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:12:48 PM

---

Submitted on Wed, 28/08/2024 - 12:11

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Regents Park, 2143

**Please provide your view on the project**

I object to it

**Submission**

Affordable housing

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:12:51 PM

---

Submitted on Wed, 28/08/2024 - 12:11

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2760

**Please provide your view on the project**

I object to it

**Submission**

I'm under mortgage pressure

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:12:49 PM

---

Submitted on Wed, 28/08/2024 - 12:11

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Oran Park 2570

**Please provide your view on the project**

I object to it

**Submission**

I am objecting to the TOD plan as it is as I feel that more affordable housing should be part of the plan.

At least 15% of the new housing in the plan should be affordable housing.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:12:57 PM

---

Submitted on Wed, 28/08/2024 - 12:12

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

206

**Please provide your view on the project**

I object to it

### **Submission**

I object to the current and ask for a minimum of 8 percent or more more affordable housing to support low income families and international students the right to affordable housing for the Canterbury Bankstown community.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:13:46 PM

---

Submitted on Wed, 28/08/2024 - 12:13

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Carramar 2163

**Please provide your view on the project**

I object to it

### **Submission**

Lack of affordable housing in the Bankstown TOD. There should be a minimum 15% allocated to affordable housing. Also, we need greater variety of residence sizing to accommodate larger families requiring affordable housing. Five star quality builds are required with a minimum 7 star rating energy rating.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:13:53 PM

---

Submitted on Wed, 28/08/2024 - 12:13

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Alex

**Last name**

Morales

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2194

**Please provide your view on the project**

I object to it

**Submission**

We need more affordable housing in our area

The current proposal only has 3-10% affordable housing for the Bankstown TOD

I believe we need at least 15% or more.

I also think we need to have a say on what type of housing is designated affordable housing. We need housing that can cater for all types of households and that includes a family that would not fit into a studio.

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:14:06 PM

---

Submitted on Wed, 28/08/2024 - 12:13

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Jalal

### **Last name**

Chami

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Condell Park 2200

### **Please provide your view on the project**

I object to it

### **Submission**

I am currently renting in the Bankstown area and have a large family (5 young children). My rental is not long term and am currently under threat of eviction due to the landlord wanting to live in his property.

I pay my rent on time and take care of the property but finding quality, suitable, affordable and stable (long-term) rentals is very difficult especially in my situation.

The T.OD. for Bankstown does not stipulate enough social and affordable housing. I believe it should be at least 15% and stipulate a variety of accommodation options including 3-4 bedroom units to suit families like mine.

I have established family and work commitments in the area, moving out of area is not an option.

### **I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:14:23 PM

---

Submitted on Wed, 28/08/2024 - 12:14

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2234

**Please provide your view on the project**

I object to it

### **Submission**

I support a target of 15% of affordable housing in the Canterbury Bankstown Transport Oriented Development with high energy efficiency structures. It should be mandated so all developers are operating within the same profitability conditions. Also the affordability application process should not be too arduous & use less red tape.

Thank you for the opportunity to contribute to this project.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:14:51 PM

---

Submitted on Wed, 28/08/2024 - 12:14

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Lakemba

**Please provide your view on the project**

I support it

### Submission

I am an International student . I Came her 2022 , thet time I didnot have job to show payslips or job documents for the house rent . We didn't know how to apply for house rent . We tried so many real estate agents but we didn't get any feedback .later my brother told me to take the house in ther name and they assured they will show their payslips to get a house for rent and that's what we did and secured a place. Now every now and then even we get any problem in house we don't make a complain in the the fear that they might tell us to go from there or they might increase the rent. We are alway in mental pressure and trauma that any time they will increase the rent. Due to this situation we are always in dilemma if any problem arises whom to talk and where to talk without fear . For the international students there should be a policy where new comers can apply for house by themselves and get it easily. There should be flexibility about making a complain so that we can tell everything without fear, moreover they should make the rent affordable for us or make more houses but not blaming us all the time that because of us the rent is

increased.Its time for solution , not blaming others.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:15:01 PM

---

Submitted on Wed, 28/08/2024 - 12:14

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2151

**Please provide your view on the project**

I object to it

### **Submission**

I'm finding it quite challenging to manage my rent payments right now. I recently graduated from university and am currently juggling two jobs, but despite my efforts, it's still difficult to make ends meet.

I was in international student visa and now I'm in temporary visa.

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:15:07 PM

---

Submitted on Wed, 28/08/2024 - 12:14

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Wiley Park

**Please provide your view on the project**

I object to it

**Submission**

I have been living in Wiley Park area. Now I have been struggling rental issue. I'm working as community support worker. Rent has been raised ever 6 months specifically after COVID situation. It's almost double rent now. It's really hard for me to afford it. I'm doing two jobs to manage expenses. I would like to request government should take initiative to balance rental issues with normal weekly wages of general as they could afford rent.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:15:15 PM

---

Submitted on Wed, 28/08/2024 - 12:15

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Rokaya

### **Last name**

Breis

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Condell Park

### **Please provide your view on the project**

I object to it

### **Submission**

I am writing a submission to express my issues with housing living in Sydney. The cost of living particularly rental prices continue to increase annually and often throughout the year. The high rental prices do not live up to the quality of housing offered. I ask for at least 15% affordable housing in Sydney.

### **I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:15:30 PM

---

Submitted on Wed, 28/08/2024 - 12:15

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Nesrine

**Last name**

Nasour

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Hurstville

**Please provide your view on the project**

I object to it

**Submission**

Ask for 15-% affordable housing.

the increase increase of rent is affecting everyone and specially the new generation and is effecting their mental health.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:15:41 PM

---

Submitted on Wed, 28/08/2024 - 12:15

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Chidozie

**Last name**

Emechafor

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Yagoona 2199

**Please provide your view on the project**

I object to it

**Submission**

I found it very hard getting a house because I hadn't the rent history and as the bond attached to it.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:15:46 PM

---

Submitted on Wed, 28/08/2024 - 12:15

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2015

**Please provide your view on the project**

I object to it

### **Submission**

The rental price increment in the past few years has been very traumatising especially as a international student, it puts a lot of pressure to have to deal with these rental criteria upon arrival to find a safe place to live in. It becomes harder when the cost is sky rocketing, in a already overwhelming situation with study and work balance. It would have been very helpful for us if the government can hear and act on these important basic needs and can make these changes for all people as it should be a basic right for everyone to find a suitable place in a country like Australia.

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:16:03 PM

---

Submitted on Wed, 28/08/2024 - 12:15

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2170

**Please provide your view on the project**

I object to it

### **Submission**

We need more affordable housing, especially when it comes to renting. As international students, I believe we should be given some priority during the selection process when searching for a place to live. Thanks

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:16:47 PM

---

Submitted on Wed, 28/08/2024 - 12:16

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2127

**Please provide your view on the project**

I object to it

### **Submission**

I want lower affordable rental properties

Rents not increased every year

Better insulated houses with better amenities

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:16:53 PM

---

Submitted on Wed, 28/08/2024 - 12:16

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2218

**Please provide your view on the project**

I object to it

**Submission**

To whom it may concern

I am really worried about lack of low cost housing, lack of infra structure that often doesn't follow and how poorly developments are often designed in terms of climate change and so on. Bankstown is already incredibly congested and infra structure is lacking. In my daily work as a DFV worker I face that lack of affordable housing every day. Bankstown has some low cost housing that is likely to disappear due to the development. We need urgent low cost housing for the most vulnerable, so please put a 15 % non negotiable housing target and finally finally implement a rent freeze and then a regulation system for rent increases. Thank you.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:16:53 PM

---

Submitted on Wed, 28/08/2024 - 12:16

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Dr Jacy

### **Last name**

Achonu

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

No Kerrie ROAD OATLANDS NSW

### **Please provide your view on the project**

I object to it

### **Submission**

It's traumatising to relocate to another area or place where your community or family is not close to you because of the high cost of housing and the scarcity of houses in the said area.

### **I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:16:58 PM

---

Submitted on Wed, 28/08/2024 - 12:16

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Yulia

**Last name**

Ilfahni

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Canterbury, 2193

**Please provide your view on the project**

I object to it

**Submission**

Government have to take action for control housing price.

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:17:41 PM

---

Submitted on Wed, 28/08/2024 - 12:17

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Abraham

### **Last name**

Darouiche

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bass Hill

### **Please provide your view on the project**

I object to it

### **Submission**

As a person who works in the heart of Bankstown, the time .taken to get to work has doubled and catching taxis around the time I finish work is almost impossible due to the traffic

### **I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:17:45 PM

---

Submitted on Wed, 28/08/2024 - 12:17

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Eden

**Last name**

B

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Ashfield 2131

**Please provide your view on the project**

I object to it

**Submission**

Bankstown TOD needs to include a special provisions for affordable/social housing. The 3-10% listed in the current plan is essentially a 3% target. This is well below the current amount of affordable housing in Bankstown, so this equates to a cut in real terms. I work with older people in Canterbury Bankstown, and I see daily our client base being pushed westward as Bankstown becomes more and more unaffordable. A 15% target for perpetual affordable housing would make a dent in maintaining the affordability of the area.

Furthermore, the older people I work with need no-cost public spaces, especially open space. The current proposal to roughly triple the population of the area includes only an extra 2ha of open space. This is wildly insufficient. That means for each extra person living in Bankstown, there would only be roughly 1 square metres of public space added. This is barely enough space for a guinea pig, let alone a human.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:18:00 PM

---

Submitted on Wed, 28/08/2024 - 12:17

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Jan

### **Last name**

Barnett

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

2219

### **Please provide your view on the project**

I object to it

### **Submission**

The process needs to be as clear and simple as possible.

15% must be legislated. If we don't have a baseline it will be difficult to achieve the outcome. Please listen to the voices of people in need.

### **I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:20:09 PM

---

Submitted on Wed, 28/08/2024 - 12:19

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

South Wentworthville

**Please provide your view on the project**

I object to it

### **Submission**

I am objecting against the Bankstown TOD submission proposal.

Recently my landlord has to sell up the rental I am currently living in and we've just in 10 months had to move from another rental. It has been so stressful finding a property that can hold our larger family with young children. Also the increase has gone up by \$300 dollars. I want 15% affordable housing.

Bankstown proposal aims for 3-10% which is not enough. I want something close to the transport.

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:20:17 PM

---

Submitted on Wed, 28/08/2024 - 12:20

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2193

**Please provide your view on the project**

I object to it

### **Submission**

- government should provide more affordable house
- government should take action to control for the increasing the price of the rent, as a renter we shoul have option not only accept of price increases
- government should provide food waste bin

Thank you,

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:20:26 PM

---

Submitted on Wed, 28/08/2024 - 12:20

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Asha

### **Last name**

Ramzan

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Dulwich Hill NSW

### **Please provide your view on the project**

I object to it

### **Submission**

I rented in Bankstown LGA prior to moving to a share house in Dulwich Hill and I had to move because my rent went up by \$150 over eighteen months.

I have had to move 10 times over the last 15 years because of rent hikes, moving is costly & stressful, it interrupts not just my life, finances and work, but my mental health because it's impossible to establish friendship networks when I have to keep moving. The lack of security, stability & affordability of rentals in this city is impacting every aspect of my life.

I would like the affordable housing targets in Bankstown LGA to be 15% (in perpetuity) of all new residential development's so people like me can have somewhere affordable and stable to live. We need stable affordable rentals in Bankstown and this will have positive impact on our health, happiness & wellbeing, both physically and mentally

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:21:01 PM

---

Submitted on Wed, 28/08/2024 - 12:20

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Violet

### **Last name**

Cabral

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

2213

### **Please provide your view on the project**

I am just providing comments

### **Submission**

As a full time uni student, I have had to pick up full time work in order to have basic needs. My savings from this will not enable me to rent or buy a house now and in the future. This project will not only increase unaffordable houses in my local area, but it will inevitably increase the percentage of mental health issues in our community, sustaining an already unhealthy environment. I fear for the future of our community if we're already at this point today.

Thank you for providing me with this opportunity to share and I urge you to take this into consideration.

### **I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:21:32 PM

---

Submitted on Wed, 28/08/2024 - 12:21

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

South Wentworthville

**Please provide your view on the project**

I object to it

**Submission**

I am objective against the Bankstown TOD submission proposal.

Need more affordable Rent proprietary for families that have are lot of kids. I want 15% affordable housing because the current percentage is not enough. I need affordable housing closer to my church in Bankstown since I am a pastor and leader at my church. But unfortunately because of the lack of affordable housing, this has been an issue.

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:22:01 PM

---

Submitted on Wed, 28/08/2024 - 12:21

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2150

**Please provide your view on the project**

I object to it

### **Submission**

With the current cost of living, we need more affordable housing. Not to mention, I do not believe that the proposal has not taken into accountability that the increase of housing within the town centre may dramatically impact the emergency services such as police, paramedics and firefighters access to support people on call.

I think it's important to also increase more

Public transport to allow access to for

Community members to enter town centres. It would also be beneficial for local councils to support the increase of smaller town centres to provide locals to access to necessities such as a local grocery store, gps, post office, bank, etc. it will decrease the high foot traffic towards town centres and support local businesses and community.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:22:51 PM

---

Submitted on Wed, 28/08/2024 - 12:22

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2199

**Please provide your view on the project**

I am just providing comments

### **Submission**

As a young worker, juggling three precarious jobs, the cost of living is at the forefront of my mind. This coupled with the crisis of housing affordability and energy sustainability I feel I cannot provide a safe and secure future for myself. The 3-10% affordable housing target outlined in section 2.5 of the Explanation of Intended Effect document, does not sufficiently address the need for more accessible and equitable housing. I strongly propose a 15% target for affordable housing to ensure more young people like myself do not have to fear what their future might hold.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:23:18 PM

---

Submitted on Wed, 28/08/2024 - 12:23

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Paddington 2021

**Please provide your view on the project**

I object to it

### **Submission**

I am objecting against the Bankstown TOD submission proposal because i am staying with family at the moment but I am trying to find a suitable home for young family of 3.

I want to afford a living on my own knowing that I can look after my overall health, mental and physical and attend my church which is also located in Bankstown.

I want affordable housing because Bankstown matters to me as my church community is here. I would love to live in the area. Unfortunately because the current proposal is only 3-10 % for affordable housing which is not enough. There needs to be at least 15% promised.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 7:56:43 PM

---

Submitted on Wed, 28/08/2024 - 19:56

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Bankstown 2200

**Please provide your view on the project**

I object to it

### **Submission**

Bankstown is already overcrowded and has a large population of immigrants which already makes it difficult to Integrate with Australian values. This will place a greater pressure on the existing community.

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 8:47:51 AM  
**Attachments:** [24-08---493-497-chapel-road,-bankstown---tod-rezoning-submission---final.pdf](#)

---

Submitted on Thu, 29/08/2024 - 08:43

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Ben

### **Last name**

Creighton

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Parramatta

### **Please provide your view on the project**

I object to it

### **Submission file**

[24-08---493-497-chapel-road,-bankstown---tod-rezoning-submission---final.pdf](#) (1.3 MB)

### **Submission**

Please find attached a submission on behalf of our client, the landowner of No.493-497 Chapel Road, Bankstown.

### **I agree to the above statement**

Yes

29 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## **SUBMISSION: BANKSTOWN TOD REZONING PROPOSAL**

### **493 – 497 CHAPEL ROAD, BANKSTOWN**

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the land owner of 493 – 497 Chapel Road, which is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

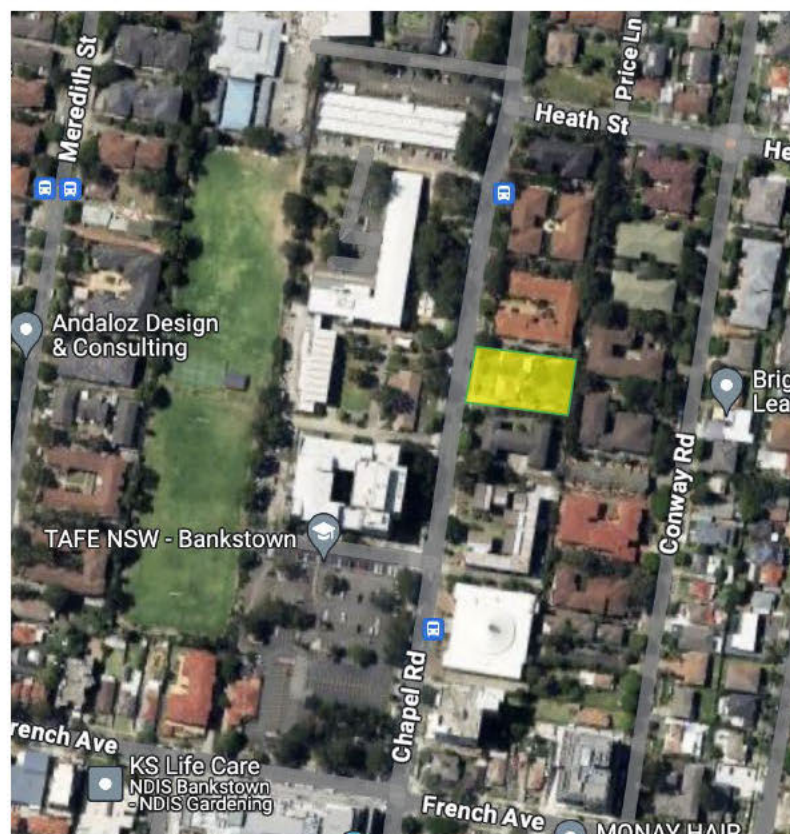


Figure 1: The subject land in its immediate context is highlighted above (Source: GoogleMaps)

Contextually, the subject land has the following relationships:

- North: Established residential flat building. Estimated to be built in the 1980's.
- South: Established residential flat building. Estimated to be built in the 1970's.
- East: Established residential flat building. Estimated to be built in the 1980's.
- West: Separated by Chapel Street is the South Western Sydney TAFE campus.

As shown in Figure 2 below, the subject land is ideally located to provide mixed use development comprising retail, support services spaces, and additional housing within the proposed B4 Mixed Use Zone that is proximate to the future Bankstown Lidcombe Hospital, while also enjoying direct walkable connections to the heart of Bankstown CBD,

The subject land is unconstrained with no heritage items or strata holdings that would make redevelopment more difficult. This submission supports the overarching theme and desire of the EIE which is to increase housing within highly accessible locations, and in the case of the subject land make a direct contribution to the character and planning intentions for the B4 land.

However, our review of the Explanation of Intended Effects (EIE) has highlighted that there is a missed opportunity to deliver more housing over the subject land than currently envisioned. This submission sets out the reasons for our view, and recommends improvements to the draft planning controls that will result in a superior outcome, capitalise on merits associated with the subject land, and will ensure that the Department takes every opportunity available to deliver on aspirations for the B4 precinct and so too the need to deliver well located housing.



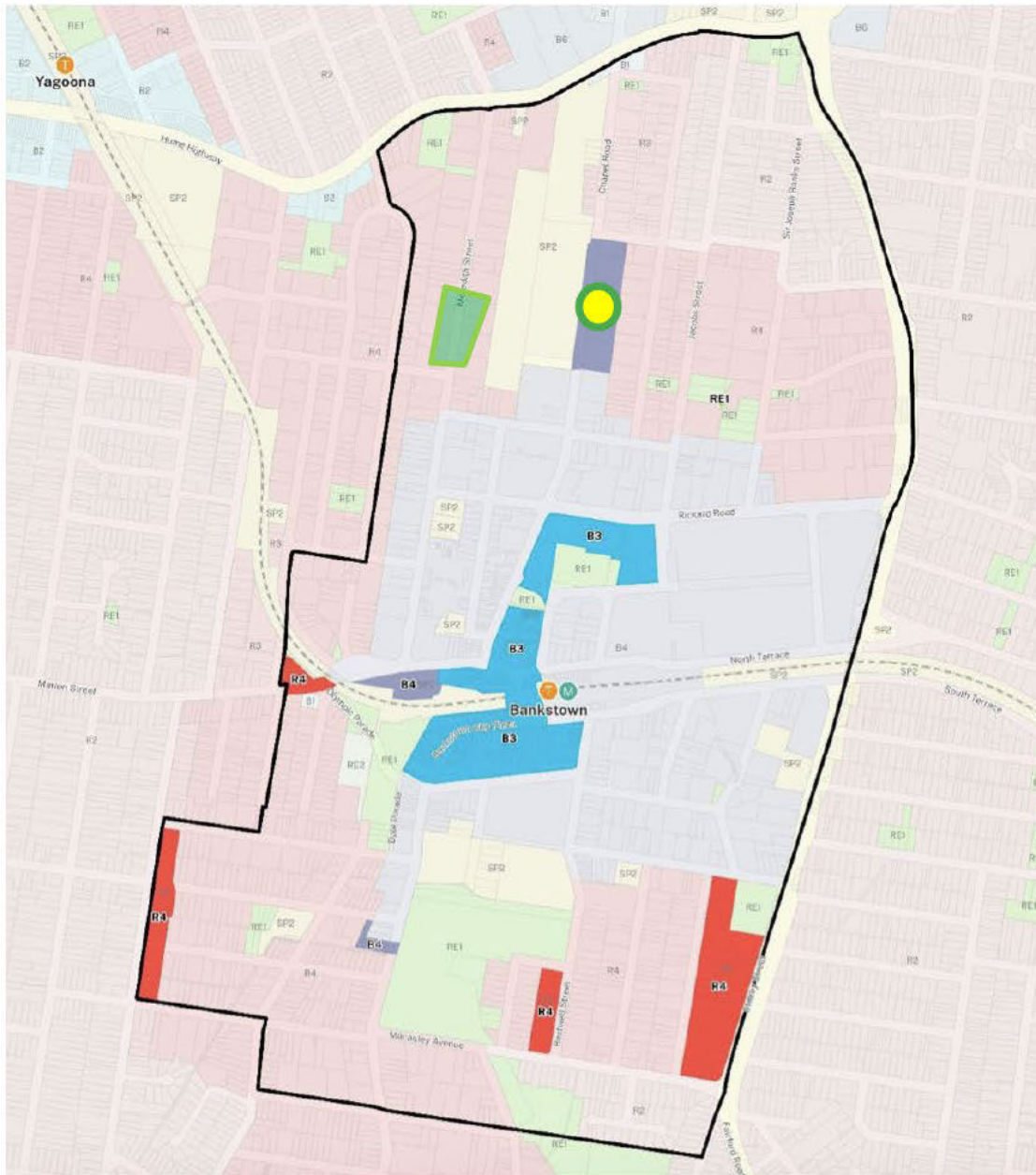


Figure 2: The site (identified Yellow) is ideally located within the B4 Precinct, with walking distance to the future Bankstown Hospital and so too the Bankstown Train Station and CBD (Source: Department of Planning and Environment )



## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Bankstown Precinct. These objectives are set out in turn below, and high level commentary is provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
– <i>increase housing supply in well-located areas</i>	<p>The subject land is within walking distance of the Bankstown train station, circa 800 metres.</p> <p>Of relevance the subject land is located within the B4 mixed use precinct that provides employment opportunities and services.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
– <i>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</i>	<p>The subject land is circa 800m from the train station.</p> <p>The site is a significant area that can accommodate housing and commercial uses as per the B4 Mixed Use Zoning proposed over the subject land.</p>	✓
– <i>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</i>	<p>The subject land offers the opportunity to support more housing within close proximity to Bankstown Station, services and entertainment offerings within the Town Centre. The location adjacent and part of the Hospital Precinct is a defining feature of the land, as this precinct will evolve to be a vibrant and active space.</p>	✓
– <i>increase the amount of affordable housing in these locations</i>	<p>The subject land can contribute to the affordable housing supply.</p>	✓



## REZONING PROPOSAL OBJECTIVES

The Department published EIE clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Bankstown TOD Precinct EIE. These are discussed below.

Objective	Response	Consistent
– <i>increase housing supply in the Bankstown City Centre;</i>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
– <i>enable a variety of land uses (residential, commercial, recreational) within walking distance of the Bankstown railway station and future metro station;</i>	The subject land can deliver a variety of land uses that are accessible via active transport means.  The subject land is ideally located within the proposed B4 precinct that will delivery a variety of uses in a precinct focused on the emerging hospital.	✓
– <i>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</i>	The subject land with amendments made to the strategy, contributes to a streamlined planning approach that delivers more housing faster.	✓
– <i>increase the amount of affordable housing across Bankstown City Centre; and</i>	The subject land can contribute to the affordable housing supply.	✓
– <i>consider the vision and objectives of the Canterbury-Bankstown Council (Council) adopted Bankstown City Centre Master Plan.</i>	The subject land can deliver the recommendations of the Bankstown City Centre Master Plan along with delivering additional residential and mixed use growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal and is identified in the Urban Design Study as a

re-development site, the actual housing capacity of the site should be realised, rather than being constrained below what is optimal.

## NOTABLE SITE CHARACTERISTICS

The land, the subject of this submission has several unique characteristics that warrant additional detailed consideration and provides an excellent opportunity to contribute to employment and housing supply in the Bankstown Precinct. Notable characteristics comprise:

1. The subject land is within walking distance to the Bankstown Train/Metro Station, and is located within an area identified for a specific purpose, to be upzoned as a complimentary precinct to the new hospital.
2. The subject land has a generous size of 1890m<sup>2</sup>, making the site within the dimensions and areas “sweet spot” to comfortably accommodate a taller building.
3. The land is within the designated B4 precinct and is in single ownership, meaning that development can occur now and be a catalyst for further development in the precinct.
4. The land is ideal for innovative planning controls that deliver on the aspirations of both employment and housing.
5. The subject land is located on the City Spine in the mixed use hospital precinct where a distinct character is appropriate, separate from the surrounding residential areas. The distinct character gives rise to opportunity to have distinct controls in relation to height and FSR.
6. The subject land is unconstrained in terms of area, land ownership or matters such as heritage. map extract below.



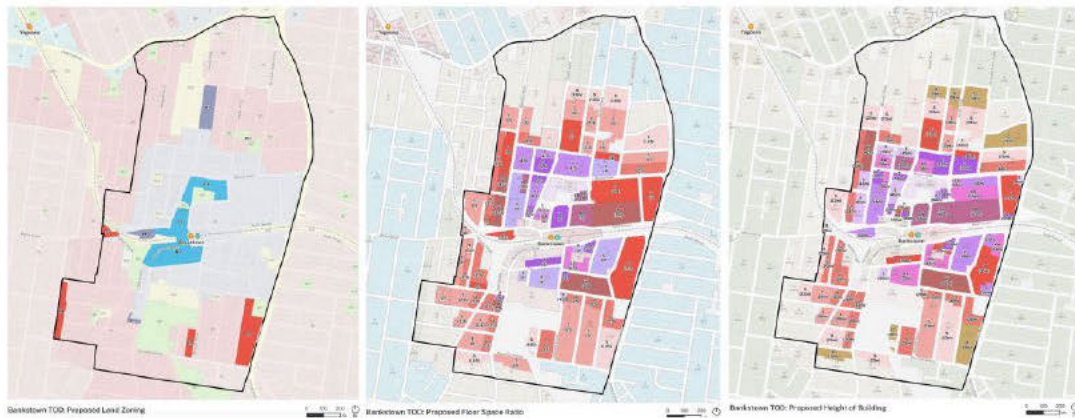
## COMMENTARY ON PROPOSED PLANNING CONTROLS

The proposed mapping amendments in relation to the subject land are illustrated below and comprise –

Zone – B4 Mixed Use

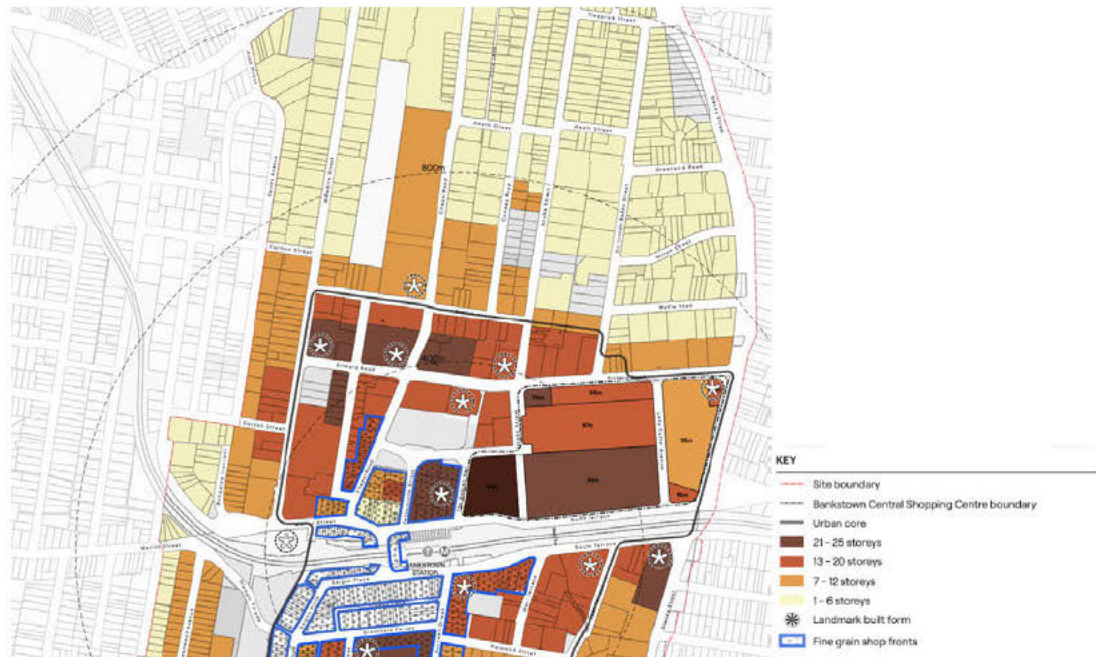
FSR – 2:1

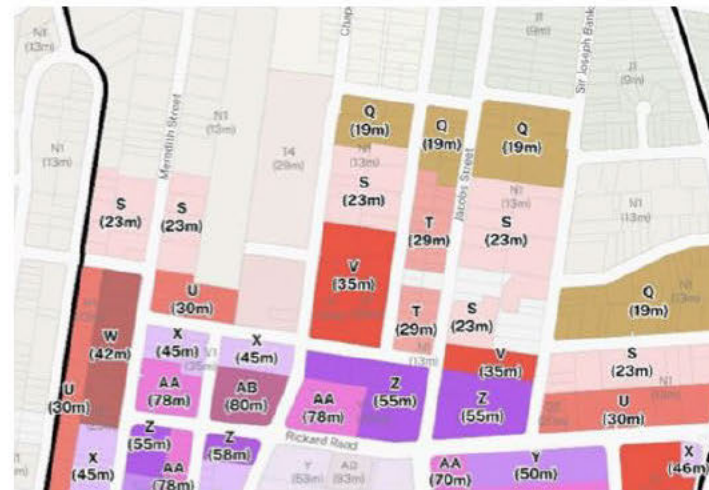
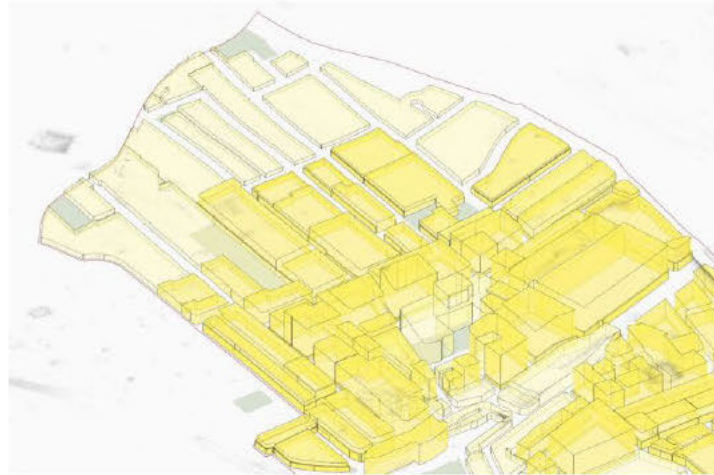
Height – 23 metres



### Height of Building

Concern is raised in relation to the inconsistent and incoherent method of applying heights of buildings in relation to the subject land. Relevant plans follow -





As can be clearly seen in the above map series of maps from the Urban Design Report and EIE, the intention expressed in the reports are not delivered in the proposed controls.

The subject land is given a diminutive height of building control compared to land to the east, notwithstanding the subject land being on the main north-south spine of the CBD and being within a dedicated precinct. The subject land deserves a more prominent height and FSR reflective of the lands location and role.

It would be far more appropriate if the subject land be recognised as 30-35m in height. It is emphasised that the subject land is of an area and dimension that is ideal for accommodating a taller building.

Concern is also expressed in relation to the 19m height designation to the north of the subject land, noting that transitions in height and FSR are best managed and located at street / block edges, and not mid way in blocks. Furthermore, to apply a 23m height



north of the subject land to Heath Street will appropriately mark the B4 zoned precinct, thereby elevating its status and so too providing incentive for other properties to be redeveloped consistent with the precincts mixed use aspirations.

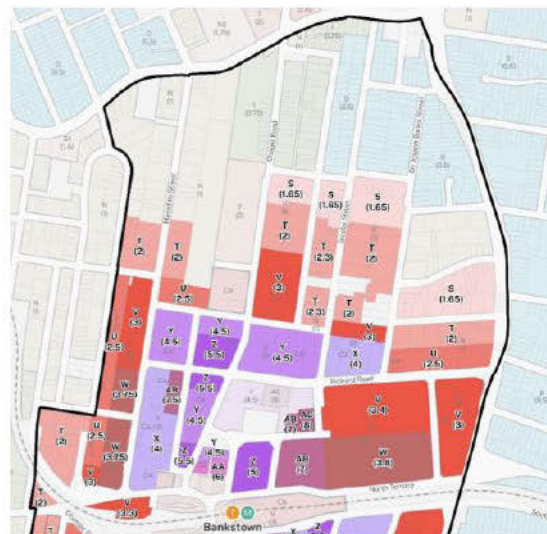
The subject land is capable of having a height of 30-35m similar to that of land to its south. Our client does not seek to go beyond the proposed planning controls to the site located to the south, however, proposes a consistent control in recognition of the:

- Precinct location of the subject land within the Bankstown TOD Precinct
- Its single ownership and size that makes redevelopment possible now
- Location within the Bankstown Centre on the north south spine.

Given the above, it is unclear why the recommended height change within the EIE propose a lower standard than more constrained land and less well located land within the town centre.

### Floor Space Ratio

We make a similar observation and raise similar concern in relation to FSR for the subject land.



The diminutive FSR of 2:1 is again applied to the ideal site in the recognised precinct, while land to the east receives an FSR of 2.3:1 and land to the south 3:1. The application of FSR is inconsistent with the hierarchy and role of the subject land. The subject land at minimum should be given an FSR of 3:1.

This submission therefore recommends that the:

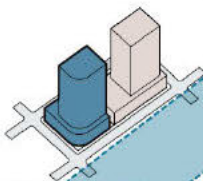
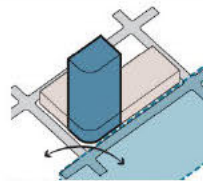
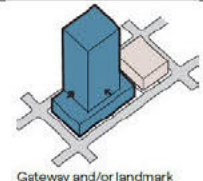
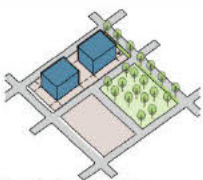
- height be increased to 29-35m, and
- FSR be increased to 3:1.



Importantly, these changes reflect and are consistent with controls already proposed within this part of the town centre, and on a site which can be readily developed to deliver additional housing to the market in a short time, rather than unknown period due to land and other constraints which are burden other sites within the Bankstown TOD precinct.

## SUBJECT LAND MEETS KEY URBAN DESIGN STRATEGIES

We commend the DPHI for preparing an urban design analysis with a firm foundation on good urban design principles and strategies. However, we object to the reduced height and FSR over the site, which is clearly capable of more capacity, based on the analysis contained within the UDS. A 29-35m building and 2.3:1 FSR over the subject site clearly achieves compliance with the following relevant urban design strategies:

Strategy		Comment	Consistency
Transit Orientated Development	 <p>Align tall buildings along streets which define the Urban Core.</p>	The subject land is appropriately located in the B4 mixed use zone and within 800m of the train station, and appropriately defines an entry into this area.	✓
Connect North and South	 <p>Locate gateway buildings on prominent corners of the Urban Core.</p>	The site is located on the prominent and evolving north south extension of the CBD along Chapel Street, anchored by the B4 zone.	✓
	 <p>Gateway and/or landmark buildings on street intersections of the north south spine</p>	As the subject land is on the north south spine, the principle of gateway buildings applies to the subject site. A higher height is therefore required that reflects its location in the B4 mixed use precinct,.	✓
Reinforce the urban core	 <p>Locate density within proximity of the Metro Station and areas of amenity.</p>	The subject land is suitable for higher density given its location within the B4 Precinct associated with the hospital.	✓

Concentrate jobs around public transport	 <p>Focus commercial around the Metro Station and centre of Bankstown.</p>	<p>The subject land is within the B4 precinct that will serve the hospital precinct and be an opportunity for employment generation and support services.</p>	✓
Combined intensification	 <p>Align new community infrastructure to intensification of residents, students and workers.</p>	<p>The subject land supports the provision of essential community infrastructure in the town centre by providing a site capable of being developed now due to its size and ownership arrangements, which can facilitate and enhance use of community infrastructure in Bankstown.</p>	✓

We particularly note that the development of the subject site with the controls recommended in this submission will be fully compliant with the ADG in terms of solar access, and other key standards that relate to amenity of future residents within and beyond the site boundary. Accordingly, we would recommend that the best place for resolving height within the envelope is the DA stage, rather than overly prescriptive mapping that focuses on one rigid outcome only.

Increasing the height over the subject site would also be consistent with the TOD and EIE objectives to have more housing in highly accessible locations and proximate to employment, whilst also delivering more affordable housing. This is particularly pertinent when +30% infill affordable housing pathway within the Housing SEPP 2021 is switched off.

## RECOMMENDATIONS

The subject land presents a unique opportunity to increase the housing supply within a highly accessible location within walking distance to Bankstown Train Station, and is commensurate with its recognised character and role as a mixed use precinct that has its own character associated with the future hospital. Accordingly, it is recommended that –

- The height be increased over the subject land to 30-35m.
- The FSR be increased over the subject site land to 3:1

## Conclusion



Thank you for the opportunity to make this submission on the accelerated Bankstown TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Bankstown TOD, we strongly recommend the adoption of the recommendations within this submission to further improve housing affordability and liveability within Bankstown.

Should you require any further information or require a meeting to discuss this further, I can be contacted on [REDACTED] or [REDACTED]

Emily Jacobsson  
Urban Planner  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 8:53:26 AM  
**Attachments:** [bankstown-tod-rezoning\\_planning-submission.pdf](#)

---

Submitted on Thu, 29/08/2024 - 08:52

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Andrew

### **Last name**

Hobbs

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Sydney 2000

### **Please provide your view on the project**

I object to it

### **Submission file**

[bankstown-tod-rezoning\\_planning-submission.pdf](#) (1.63 MB)

### **Submission**

Please refer to attached submission, prepared by Urbis on behalf of the Bankstown Sports Club.

### **I agree to the above statement**

Yes





**ANGEL PLACE  
LEVEL 8, 123 PITT STREET  
SYDNEY NSW 2000**

URBIS.COM.AU  
Urbis Ltd  
ABN 50 105 256 228

28 August 2024

Kiersten Fishburn  
Secretary  
Department of Planning, Housing and Infrastructure  
Via NSW Planning Portal

Dear Kiersten,

## **BANKSTOWN TOD REZONING | BANKSTOWN SPORTS CLUB SUBMISSION**

The purpose of this submission is to set out the key implications of the proposed Bankstown Transit Oriented Development (**TOD**) Precinct rezoning proposal, inclusive of the exhibited documentation as it relates to the land owned by the Bankstown Sports Club in the Bankstown Town Centre and to provide suggested recommendations for the finalisation of the amendments to the Planning framework under the Bankstown TOD Precinct rezoning proposal.

### **1. INTRODUCTION**

This submission has been prepared by Urbis Ltd (**Urbis**), on behalf of Bankstown Sports Club (**BSC**), regarding the Bankstown TOD Precinct rezoning proposal. The purpose of this submission is to set out the key implications of the rezoning documentation as it relates to the land owned by the BSC, along with suggested recommendations.

As will be discussed further within this submission, BSC have a range of concerns related to the proposed planning controls for each site, including:

- The identified recreation facility nomination and through site link locations for the main club site.
- Proposed zoning and key development controls of the properties owned along Greenfield Parade.
- Proposed zoning of the land from regarding the Bankstown City Plaza land holdings.
- The proposed floor space ratio (**FSR**) for the Restwell Street properties.
- Proposed zoning of the Bowling Club site.

Given the size of the BSC landholdings, and the direct implications this land has for achieving the objectives of the proposed TOD rezoning, the BSC would welcome open dialogue with the DPHI as this matter progresses to ensure an acceptable outcome can be achieved.

### **2. BANKSTOWN SPORTS CLUB**

Bankstown Sports Club is a sport and community focused not-for-profit organisation, based in the heart of Sydney's southwest in Bankstown. From humble beginnings in a small church hall in 1958, where several local sporting groups gathered to trade ideas and provide updates on their sporting achievements, the organisation has grown to be one of the leading hospitality venues in the country,



supporting 43 sporting clubs and more than 100 community organisations across the Canterbury-Bankstown, Cumberland, and Hills Shire areas.

BSC aim to bring people together and create a sense of belonging for those in our community. The club was created by the local community, for the local community and has a mission to 'Make A Difference' with a purpose to support and encourage the community to be the best it can be. BSC have dedicated the past six decades to fostering grassroots sport, providing financial and in-kind support to local community organisations, and giving volunteers a platform to dedicate their time and skills to helping others.

BSC has had a strong and proud history, and it strives to continue to support the community into the future. The BSC has undertaken several property acquisitions in the Bankstown Town Centre with the aim of providing sustainable and diversified sources of revenue from future redevelopment.

### 3. KEY CONCERNS AND RECOMMENDATIONS

This section of the report provides a summary key concerns and recommendations for amendments to the exhibited Bankstown TOD Precinct rezoning proposal, as described in the submission:

Table 1 Summary of key concerns and recommendations

Site	Key Concerns and Recommendations
<b>Main Bankstown Sports Club site</b>	<p>The mixed use zoning and increased height and FSR controls (including the minimum non-residential FSR control) are a welcomed addition, with no suggested changes recommended.</p> <p>In regard to the 'open to sky through site link' BSC contend this to be a redundant inclusion which would not be achieved until such time as a complete redevelopment is proposed and should be removed. The suitability of through site links could be considered as part of a future design excellence process for a holistic site redevelopment proposal, rather than being strictly defined in the planning controls.</p> <p>Any reference requiring the BSC site to be a recreation facility in the SJB Urban Design Study or any other document must be removed as this has not been discussed with the BSC and it has the potential to act as an inhibiting factor for future mixed use residential development, which is the intention of the proposed controls. It is recommended that the Department confirm whether the recreation facilities relate to the current facilities provided at the site or if this is to be other public or private recreation facilities.</p>
<b>Greenfield Pde properties</b>	<p>The rezoning proposal seeks to amend the zoning of these sites from B4 to B3, placing a complete prohibition on any form of residential accommodation despite these blocks being immediately adjacent a Metro/rail station. While it is acknowledged that the proposed rezoning seeks to deliver both housing and jobs, the State Government's current and primary objective is to deliver more housing in well located places. Without these, arguably there is little need or reason to deliver more employment generating floor space. Retaining a mixed-use zoning, or site-specific Schedule 1 additional permissible uses, is undeniably a more efficient use of these sites, ensuring that both housing and</p>

Site	Key Concerns and Recommendations
	<p>jobs can be delivered in a balanced approach. As such, it is recommended that:</p> <ul style="list-style-type: none"> <li>▪ The zoning of these sites enables residential accommodation along with commercial premises.</li> <li>▪ The development standards are increased to 70m and 4:1, the same as the main BSC site.</li> </ul>
<b>Bankstown City Plaza properties</b>	<p>No changes are proposed to the built form controls (HOB or FSR) for the Bankstown City Plaza properties in the proposed rezoning. A change is proposed to the zoning of the land from Zone MU1 Mixed Use to B3 Commercial Core. This undeniably has a significant impact on the value of these sites. Whilst from an urban design and interface perspective the BSC understand the limitations to intensification of these sites, simply prohibiting any form of residential accommodation will severely inhibit the realisation of redevelopment of these sites.</p> <p>It is recommended that Zone MU1 Mixed Use be retained and the height and FSR controls revert to the controls in Council's Master Plan, as follows:</p> <ul style="list-style-type: none"> <li>• Height of Buildings: 6-8 storeys</li> <li>• Floor Space Ratio: 3.5:1 - 4.5:1 FSR</li> </ul> <p>Clarification on which properties are required to be heritage listing, noting the club will only support façade of 6 Bankstown City Plaza being identified as having heritage significance, which is consistent with the GML Heritage report.</p>
<b>Restwell Pde property</b>	<p>It is recommended the height and FSR controls be amended as follows:</p> <ul style="list-style-type: none"> <li>• Height of Buildings: 18 storeys (or equivalent height in metres)</li> <li>• Floor Space Ratio: 5:1 FSR</li> </ul>
<b>Bowling Club Site</b>	<p>BSC is concerned that the Bankstown TOD Precinct identifies the Bowling Club Site as a potential extension of Griffith Park. The Bowling Club site is privately owned and currently located on land in the Zone RE2 Private Recreation. BSC wish to notify the Department that it is seeks a rezoning of the Bankstown Bowling Club to Zone MU1 Mixed Use or introduction of a site-specific additional permitted use to enable high density residential development on the Bowling Club Site.</p> <p>It is recommended the zoning, height and FSR standards for the Bowling Club site be deferred from the finalisation of the Bankstown TOD Precinct rezoning, and a site-specific planning process be commenced in consultation with the BSC to devise appropriate planning controls, that envisage a mixed use and residential development with open space that enhances the public open space network, whilst including additional housing.</p>



## 4. SITE DETAILS

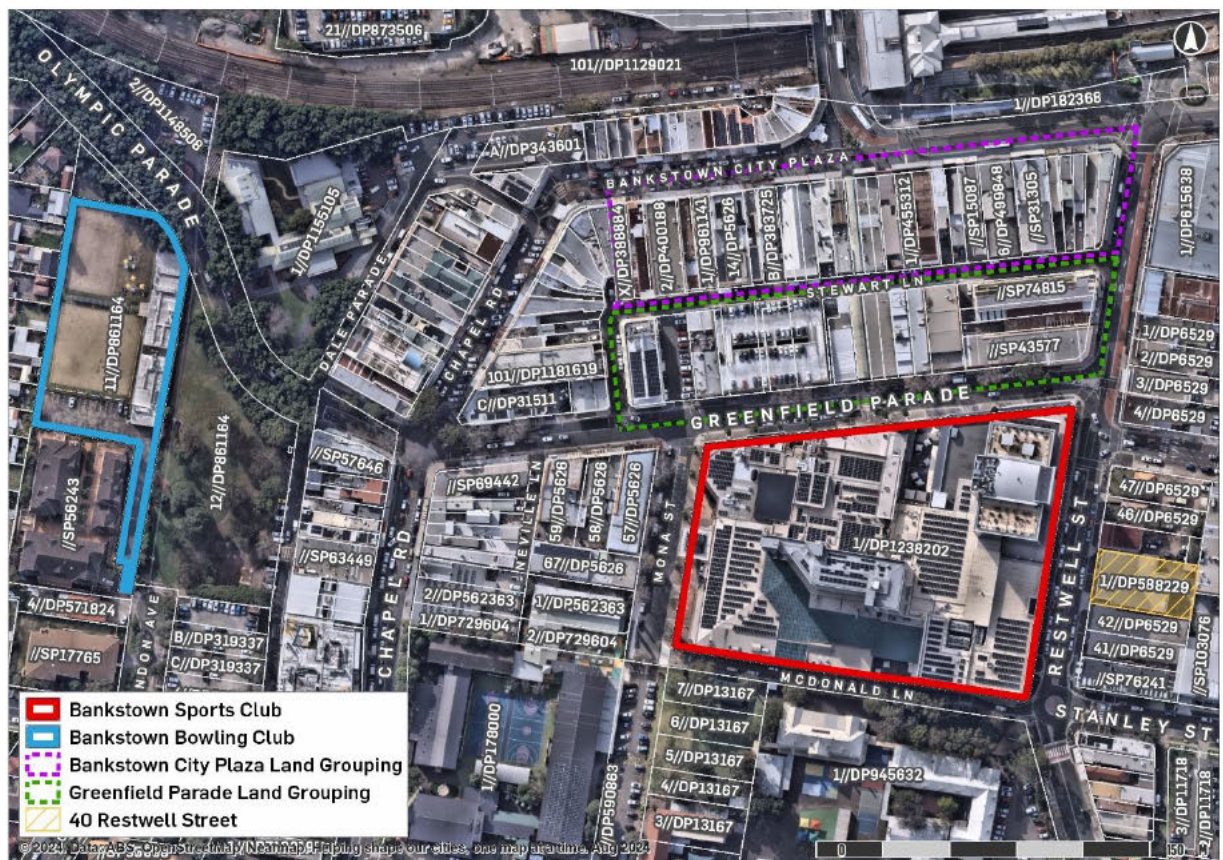
Significant government and institutional investment including Sydney Metro City and South, a relocated Western Sydney University campus, and a commitment to a new hospital has been nominated for the Bankstown Centre area. This investment in key transport, health and education infrastructure support Bankstown as an emerging Strategic Centre.

BSC has one of the largest landholdings in Bankstown Town Centre. Acquired over many years, these sites represent a significant strategic opportunity for the growth of the Bankstown Town Centre, the BSC and the wider community.

The landholdings comprise the following land groupings (Note: the following five generalised land holding references will be used where convenient within this advice, in lieu of listing individual site addresses):

- Main Bankstown Sports Club site
- Greenfield Pde properties
- Bankstown City Plaza properties
- Restwell Pde property
- Bowling Club Site

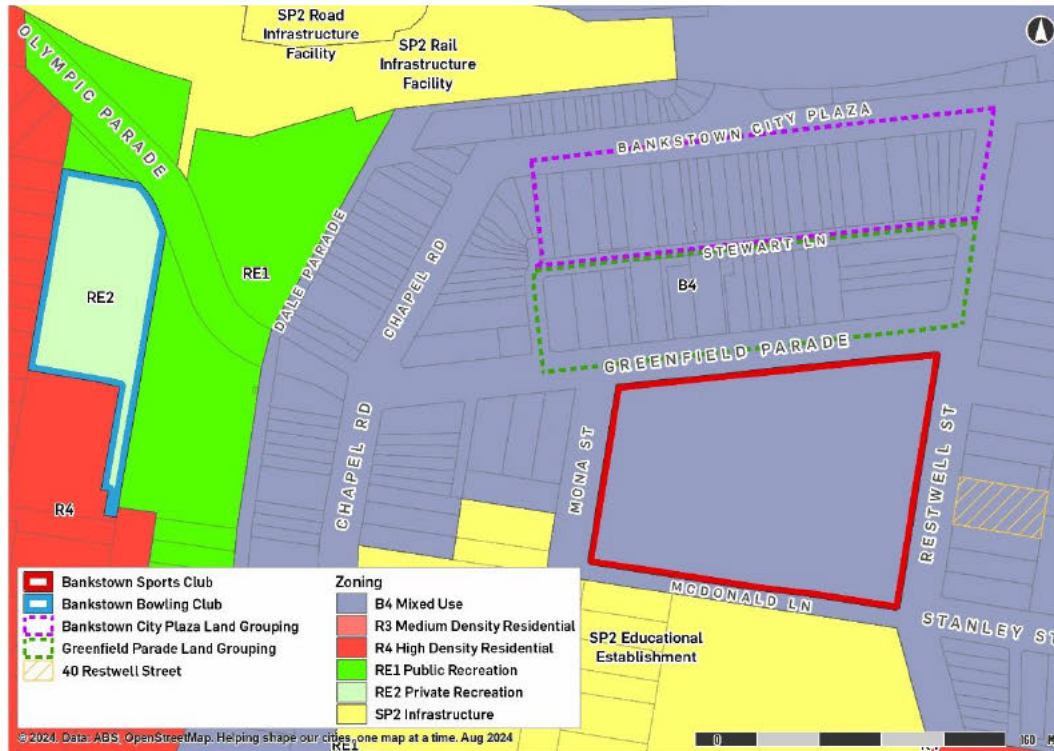
Figure 1 Site Aerial Map



Source: Urbis, 2024

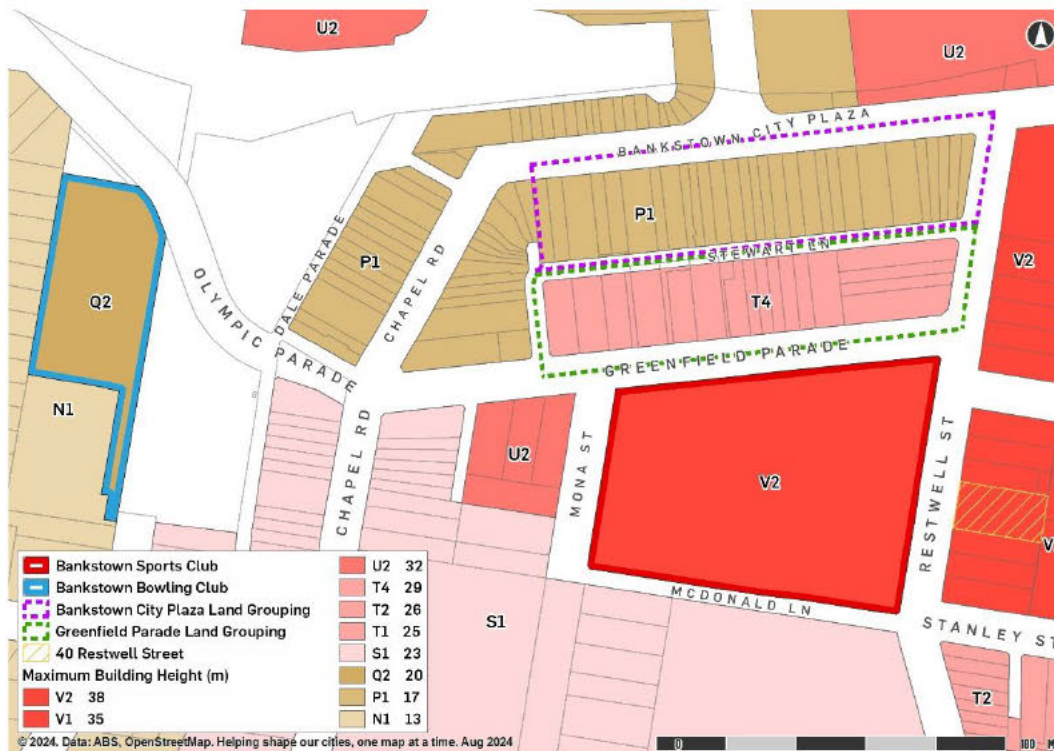


Figure 2 Current Zoning Map



Source: Urbis, 2024

Figure 3 Current HOB Map



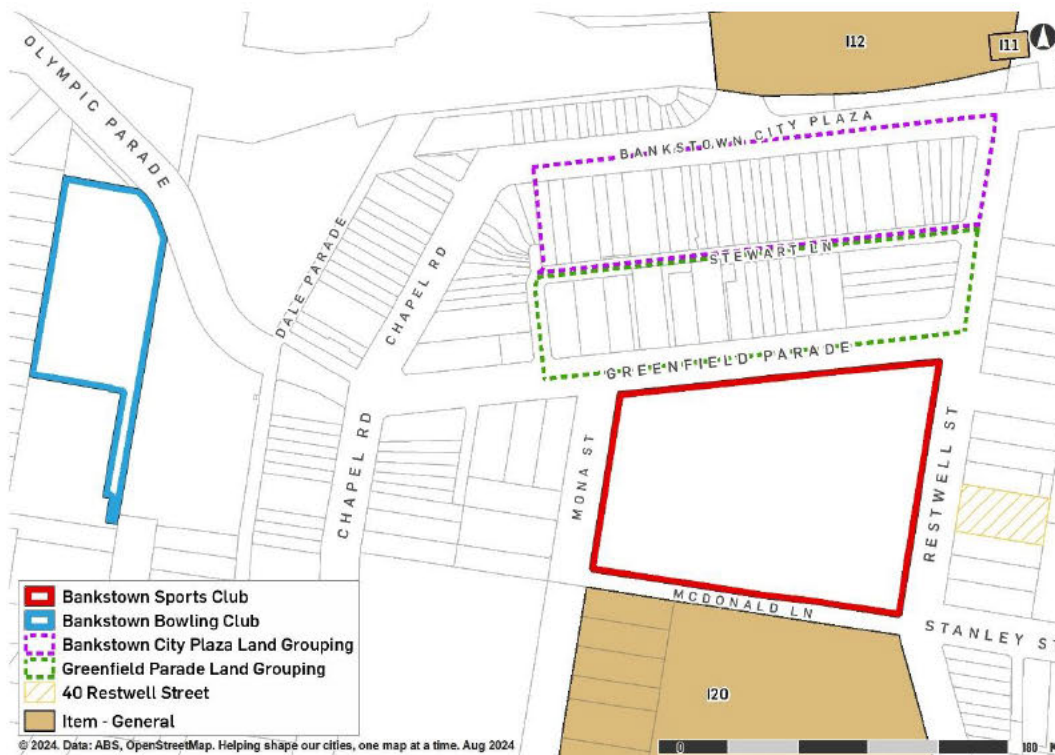
Source: Urbis, 2024

Figure 4 Current FSR Map



Source: Urbis, 2024

Figure 5 Current Heritage Map



Source: Urbis, 2024



## 5. BANKSTOWN CITY CENTRE MASTER PLAN

The Bankstown City Centre Master Plan (**the Master Plan**), adopted by Canterbury Bankstown Council (**Council**) on 28 September 2021, aims to have more people living, working, studying, visiting and investing within the Canterbury Bankstown Local Government Area's (**LGA**) largest strategic centre. This means locating higher density living and jobs around the future Metro Station, and close to amenities, services and infrastructure. The Master Plan intends to set Bankstown City Centre on a path of becoming a genuine health, academic, research and training precinct. The Bankstown City Centre Master Plan builds upon Council's broader strategic planning framework, including the key directions and aspirations of Council's Local Strategic Planning Statement, Connective City 2036 and Community Strategic Plan CBCity 2028.

Given the Master Plan directly informed the currently exhibited Bankstown TOD rezoning proposal, it is important to understand the changes proposed by the Master Plan as the guiding Council document proposing a change to environmental planning controls applying to the site.

The Master Plan directly responds to several drivers for change, including:

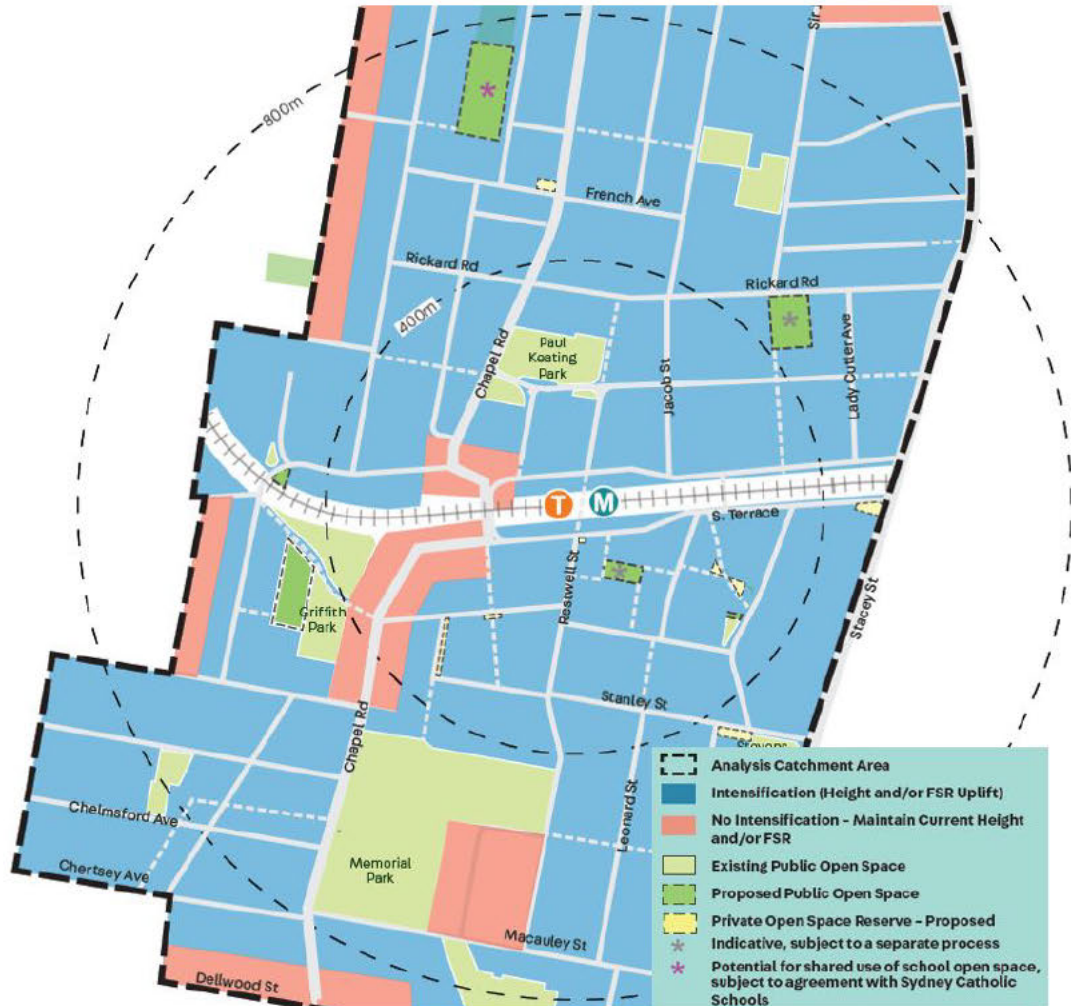
- Jobs growth, which leverages off key government and institutional investments in transport, education and health.
- Housing affordability, by providing a range of housing types, and introducing mechanisms for the delivery of affordable housing.
- A growing population, with diverse needs in terms of housing types and access to infrastructure and services.
- Demand for sustainability and resilience, improving the environmental performance of the City Centre and managing the impacts of climate change.
- Directions set out how Council will implement the Master Plan in key areas including infrastructure, design, jobs growth, public places and spaces, transport, sustainability, heritage and culture, housing and governance.
- Moving better, by creating more people-focused streets and capitalising on Bankstown's strong rail, future Metro and bus connectivity.

### 5.1. PROPOSED CHANGES UNDER THE MASTER PLAN

#### 5.1.1. Built Form

As relevant to the BSC landholdings, the Master Plan proposes an intensification to several of the sites. The following diagram summarises the applied intensification principles on a block-by-block basis, identifying the blocks within the study area that are subject to some level of height and/or FSR intensification.

Figure 6 Proposed Intensification



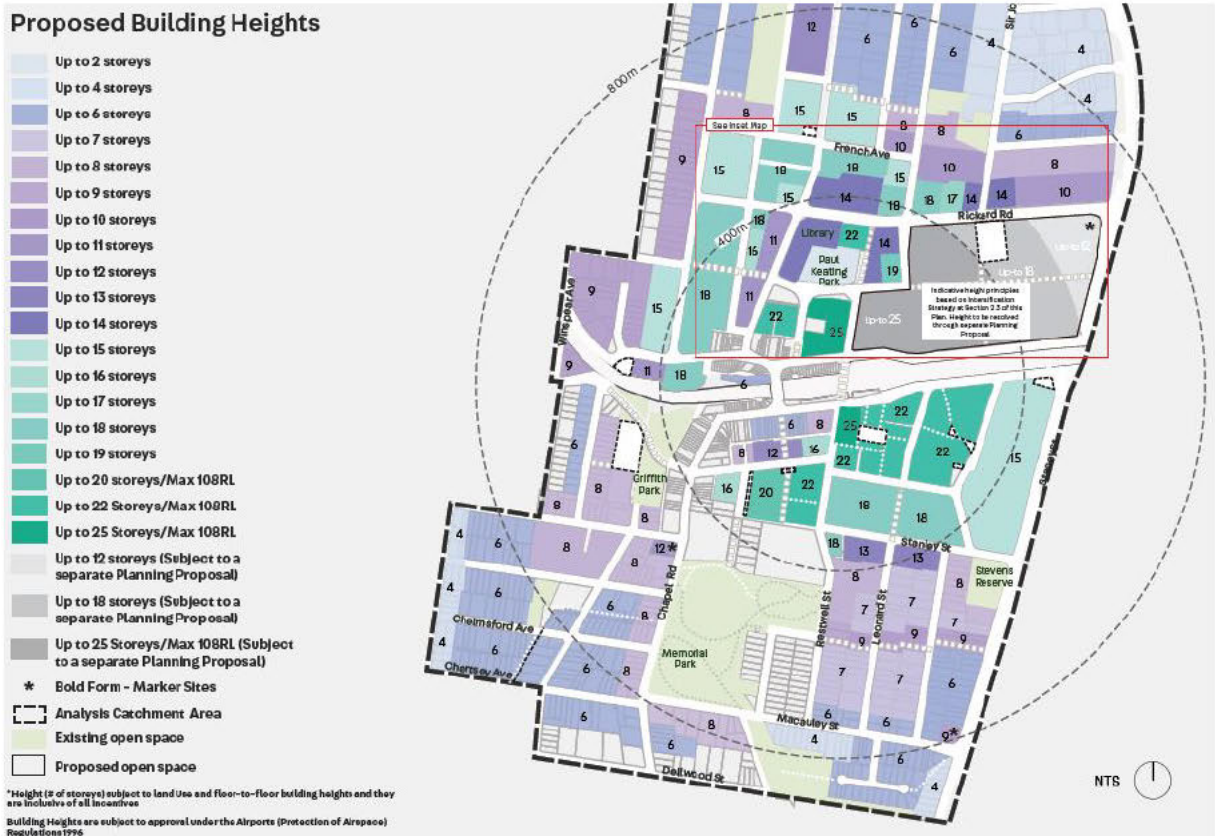
Source: Bankstown City Centre Master Plan, 2021

As depicted on the above plan and noting the generalised land grouping terms from Section 2 above, intensification is proposed at all sites other than the Bowling Club site, which is designated as being proposed for Public Open Space. This is despite currently being in private ownership and zoned RE2 Private Recreation.

In addition to this, the Master Plan documentation proposed the introduction of a through site link, connecting Greenfield Parade to the north, with McDonald Lane to the South, and Restwell Street to the East. It is acknowledged however that this requirement would only be triggered in the event of a whole-of-site redevelopment. The maps below depict the proposed changes to height of building and floor space ratio development standards.



Figure 7 Proposed HOB Controls

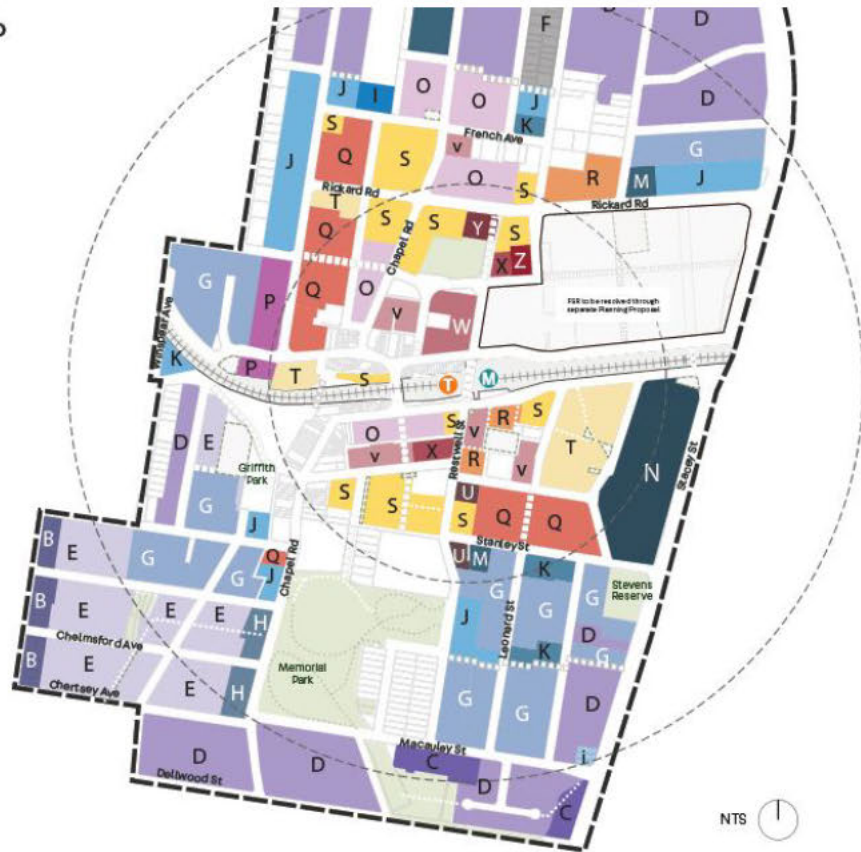


Source: Bankstown City Centre Master Plan, 2021

Figure 8 Proposed FSR Controls

Proposed floor space ratio

a	0.4:1
A	1:1
B	1.2:1
C	1.35:1
D	1.5:1
E	1.65:1
F	1.75:1
G	2:1
H	2.15:1
I	2.20:1
i	2.25:1
J	2.5:1
K	2.65:1
M	3:1
N	3.25:1
O	3.5:1
p	3.75:1
Q	4:1
R	4.25:1
S	4.5:1
T	4.75:1
U	5:1
V	5.5:1
W	5.8:1
X	7.5:1
Y	8:1
Z	8.5:1
--- Analysis Catchment Area	
Existing open space	
Proposed open space	



Source: Bankstown City Centre Master Plan, 2021

## 5.1.2. Development Typologies

Along with the built form controls, refinements are proposed to the building typologies as follows:

- **Main Bankstown Sports Club site**
  - Street wall and tower typology: Podium Towers are proposed in high intensification areas, within the core of the City Centre on key sites surrounding the train station and along Rickard Road, Meredith Street and Restwell Street. These are perceived as the key areas within Bankstown City Centre with the characteristics required to achieve a higher level of intensification on a single site, while also accommodating a variety of uses. Careful consideration to pedestrian amenity and human scale of the streets is required.
- **Greenfield Pde properties, Bankstown City Plaza properties, Restwell Pde property**
  - Fine grain shop top housing and commercial buildings: Fine Grain Shop Top Housing and commercial buildings are located on sites in Saigon Place along Chapel Road South and parts of Marion Street East, where alterations and additions to existing historic buildings and new buildings are to be sympathetic to and enhance the historic local character, in line with the desired future character of the Food and Culture Precinct. The aim of this built form is to promote sensible urban renewal of Saigon Place responsive to the local culture, existing fine-grain condition stemming from the narrow shop fronts, existing heritage items and potential heritage items under investigation.



- **Bowling Club Site:**
  - Nominated as public open space with no built form typology.

## 5.2. HERITAGE

Additionally, one of the sites owned by BSC are recommended in the Master Plan to be identified as containing heritage significance as follows:

- **Address:** 6 Bankstown City Plaza
  - **Description:** Constructed in circa 1930 by Thomas and Charlotte Hackett. An Art Deco style commercial building with interesting original detailing remaining on upper façade. Below the awning the shop fronts have been highly modified with little remaining original fabric. A prominent facade within the streetscape.
  - **Significance:** Local
  - **Significance Criteria:** Historic, Aesthetic, Representative

## 6. BANKSTOWN TOD PRECINCT REZONING PROPOSAL

### 6.1. OVERVIEW

Bankstown has been identified as an accelerated precinct under the State Government's TOD program. The DPHI has prepared the draft Bankstown TOD rezoning proposal for public exhibition, along with an Explanation of Intended Effects (EIE), Urban Design Study, and supporting technical documents; all of which have been reviewed as part of this submission.

As part of the TOD Program, DPHI has reviewed planning controls in Bankstown to identify areas of the precinct suitable to support more homes. The Bankstown TOD Precinct Rezoning Proposal builds on the vision of the Bankstown City Centre Master Plan, adopted by the City of Canterbury Bankstown in 2021, as described above. The rezoning proposal aims to enable more new homes to be delivered within walking distance of key public transport interchanges, promoting active transport opportunities such as walking and cycling and reducing reliance on other modes of personal transport.

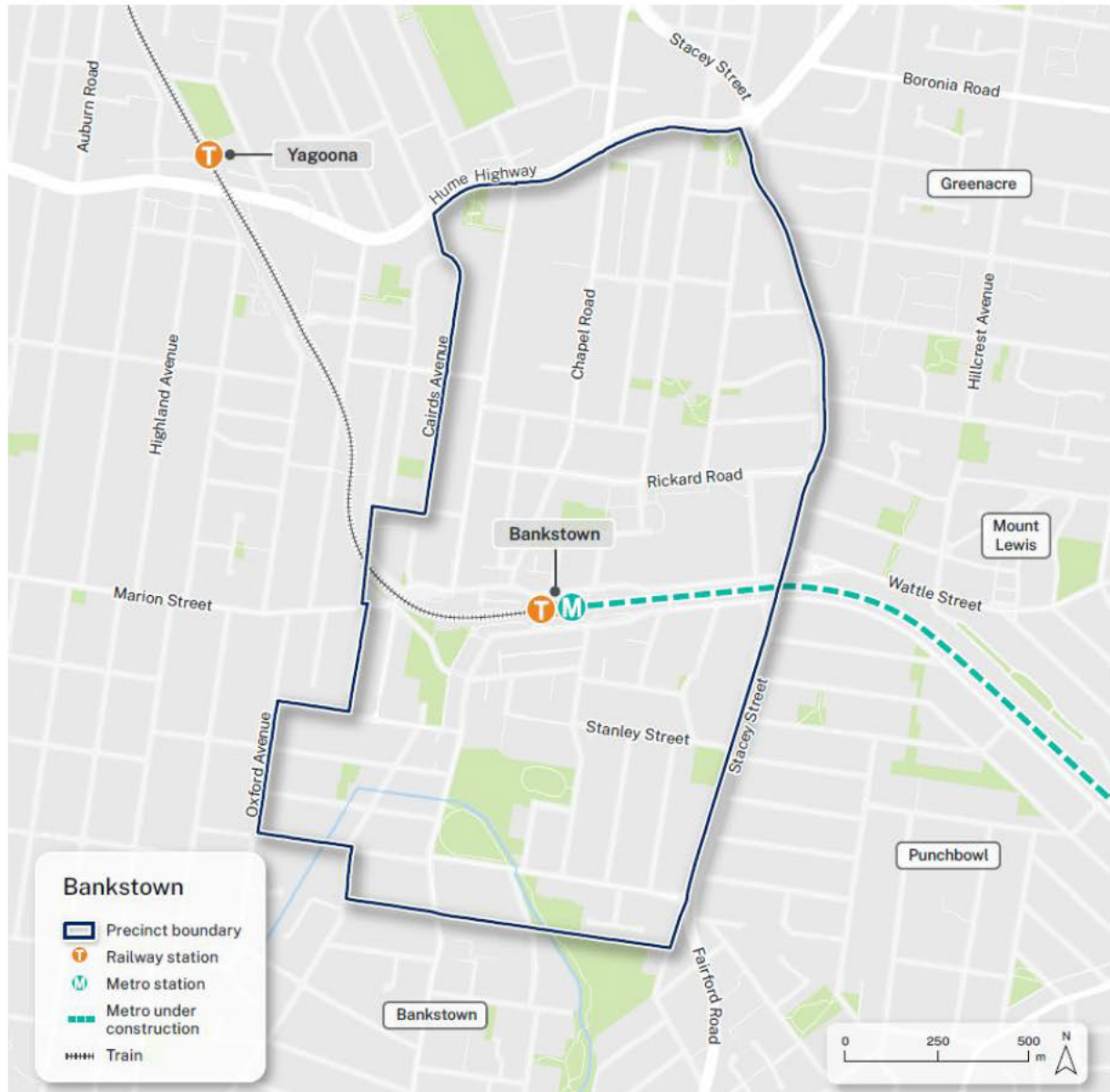
The rezoning proposal is proposed to be implemented through amendments to the Canterbury-Bankstown LEP 2023 maps and provisions, via a SEPP Amendment. The objectives and intended outcomes of the proposed SEPP Amendment are to:

- Increase housing supply in Bankstown City Centre.
- Enable a variety of land uses (residential, commercial, recreational) within walking distance of the Bankstown railway station and future metro station.
- Deliver housing that is supported by attractive public spaces, vibrancy and community amenity.
- Increase the amount of affordable housing across Bankstown City Centre.
- Consider the vision and objectives of the Canterbury Bankstown Council (Council) adopted.

The land the subject of the Bankstown TOD Precinct changes, is depicted below.



Figure 9 Bankstown TOD Precinct Map



Source: DPHI, 2024

The rezoning proposal aims to build on the vision of Bankstown City Centre Master Plan adopted by the City of Canterbury Bankstown City Council in 2021 and enable capacity for up to 12,500 new homes close to the new Bankstown Metro station.

Key features of the rezoning proposal include:

- Capacity for up to 12,500 new homes within the precinct close to the new Bankstown Metro station.
- Mandatory affordable housing contribution of 3–10% for all new residential development in the Precinct, delivering between 375–1,250 affordable homes in perpetuity and managed by a registered Community Housing Provider.
- Potential to support 15,000 new jobs in the area.

- Potential for new open space, pathways and cycleways.

The rezoning proposal for Bankstown has been informed by an urban design framework that includes the following key elements:

- Concentrate and contain development around the Metro Station within the urban core and inner neighbourhoods.
- Reinforce and strengthen the north-south pedestrian spine, which builds on the existing vibrancy of Saigon Place.
- Connect and expand open spaces.
- Strengthen the urban core by reinforcing the grid of streets and establish a legible skyline.
- Concentrate jobs around public transport and along the pedestrian spine to make employment opportunities easily accessible.

As relevant to this submission, the objectives and intended outcomes of the proposed rezoning are to:

- Increase housing supply in the Bankstown Precinct.
- Enable a variety of land uses (residential, commercial, recreational) within walking distance of the future Bankstown Metro.
- Deliver housing that is supported by attractive public spaces, vibrancy, and community amenity.
- Increase the amount of affordable housing across the Bankstown Precinct.

The proposed amendments to the precinct intend to support a transition to a higher density transit-oriented centre comprising a range of housing types, supported by commercial development, schools, community facilities, a new hospital and open space.

## 6.2. CHANGES TO BSC LAND

The following table summarises the proposed changes to zoning, height of building and FSR standards for land owned by the BSC.

Table 1 Proposed Zoning, Height and FSR Changes

Site	Zoning Current	Zoning Proposed	FSR Current	FSR Proposed	Height Current	Height Proposed
Main club	B4	B4	3:1 + SA1	4:1	38m	70m
Bowling Club	RE2	RE2	1:1	Nil	20m	n/a
Greenfield Pde	B4	B3	3:1 + SA1	5:1	29m	39m
BCP Sites	B4	B3	2:1	2:1	17m	17m
Restwell St	B4	B4	3:1	3.5:1	38m	42m



The following table summarises the differences between the adopted Bankstown City Centre Master Plan, 2021 and proposed Bankstown TOD Precinct controls.

Table 2 Comparison of Zoning, Height and FSR Changes

Site	Zoning Adopted Master Plan 2021	Zoning Proposed	FSR Adopted Master Plan 2021	FSR Proposed	Height Adopted Master Plan 2021	Height Proposed
Main club	B4	B4	4.5:1	4:1	20-22 storeys	70m
Bowling Club	RE1	RE2	Nil	Nil	Nil	n/a
Greenfield Pde	B3	B3	5.5:1 - 7.5:1	5:1	12-16 storeys	39m
BCP Sites	B3	B3	3.5:1 - 4.5:1	2:1	6-8 storeys	17m
Restwell St	B4	B4	4.5:1	3.5:1	18 storeys	42m

The key differences between the adopted Bankstown City Centre Master Plan, 2021 and proposed Bankstown TOD Precinct controls are, as follows:

- **Main Club:** Maximum FSR reduced from 4.5:1 to 4:1.
- **Bowling Club:** Zoning change from RE1 Public Recreation to RE2 Private Recreation, consistent with current zoning.
- **Greenfield Parade:** Maximum FSR reduced from 5.5:1 – 7.5:1 to 5:1.
- **BCP Sites:** Maximum FSR reduced from 3.5:1 – 4.5:1 to 2:1 and maximum height reduced from 21.8m - 32.4m (equivalent of 6-8 storeys) to 17m.
- **Restwell St:** Maximum FSR reduced from 4.5:1 to 3.5:1 and maximum height reduced from 60.2 metres (equivalent of 18 storeys) to 42 metres.

**The proposed height and FSR controls for the Greenfield Parade, BCP Sites and Restwell Street represent significant reductions compared to the Council's adopted Master Plan, which does not support the Government's objectives for providing additional housing in well located areas including Bankstown City Centre supported by the future Metro station.**

In addition to the key built form controls changes outlined above:

- The Bankstown Sports Club main club site is nominated as a 'key site', meaning the site has been identified to deliver a proposed minimum amount of non-residential floor space or employment generating floor space. As noted in the EIE, these sites have been chosen to provide employment generating floor space because they are located close to the future Bankstown Metro Station and the proposed B3 Commercial Core Zone. The minimum non-residential FSR is proposed to be 1.4:1 for the BSC site.



- The Heritage Significance Assessment Report prepared by GML lists one of the BSC sites at 6 Bankstown Central Plaza as being suitable for a local heritage listing aligning with the recommendation of the Council endorsed Master Plan.
- The EIE acknowledges that Council has endorsed and implemented the Canterbury-Bankstown Local Infrastructure Contributions Plan 2022 (Contributions Plan) which addresses the infrastructure impacts of growth in the Canterbury Bankstown LGA between 2021 and 2036, which has taken into consideration the infrastructure requirements for the precinct as outlined in the Master Plan. DPHI is currently working with the Council to identify any infrastructure gaps resulting from the rezoning proposal.
- Page 73 of the SJB Urban Design Study prepared by SJB identified the BSC site should be a recreational facility.

## 7. RECOMMENDATIONS

### 7.1. MAIN CLUB SITE

The increased height and FSR controls (including the minimum non-residential FSR control) are a welcomed addition, with no suggested changes proposed.

In regard to the 'open to sky through site link' recommended by the SJB Urban Design Study exhibited with the EIE, the BSC contend this to be a redundant inclusion which would not be achieved until such time as a complete redevelopment is proposed. A knock-down redevelopment for the site would render the current operations completely inoperable, however, in the event this was to occur, clause 6.15 of the *Canterbury Bankstown Local Environmental Plan 2023* would likely be triggered. It would be reasonably assumed that in demonstrating a design that exhibits design excellence, regard would have to be had for pedestrian movement in and around the site. It is therefore recommended that in lieu of identified through site link locations, the requirement be redrafted to simply require consideration for such linkages as part of any site-specific design excellence process.

Any reference requiring the BSC site to be a recreation facility in the SJB Urban Design Study or any other document must be removed, as it has the potential to act as an inhibiting factor for future mixed use residential development, which is the intention of the proposed controls.

### 7.2. GREENFIELD PARADE PROPERTIES

The rezoning proposal seeks to amend the zoning of these sites from MU1 Mixed Use to B3 Commercial Core, placing a complete prohibition on most feasible forms of residential accommodation despite these blocks being immediately adjacent a Metro/rail station. While it is acknowledged that the proposed rezoning seeks to deliver both housing and jobs, the State Government's current and primary objective is to deliver more housing in well located places. Without these, arguably there is little need or reason to deliver more employment generating floor space. Retaining a mixed-use zoning, or site-specific Schedule 1 additional permissible uses, is undeniably a more efficient use of these sites, ensuring that both housing and jobs can be delivered in a balanced approach.

While the height of building and FSR increases are welcomed, they are considered minimal given the context of these sites and the potential they contain to deliver on the State Government's objective of increased housing in well located locations. The club requests that the proposed FSR and Height limits for Greenfield Pde are increased substantially for the following reasons:

- The main club site, currently shown as being the 'high rise' residential section of the south precinct, is not the most viable location for residential development in the short term, given the disruption redevelopment would cause the current club operations. For this reason, the BSC have been acquiring land within the immediate vicinity, with clear intention to redevelop for the benefit of the Bankstown TOD Precinct.



- This leaves the Greenfield Parade properties as the most viable and suitable choice for increased density, namely that of a mixed-use nature to create a 24-hour hub, noting this could occur with minimal disruption to the club.

As such, it is recommended that:

- The zoning of these sites enables residential accommodation along with commercial premises.
- The development standards are increased to 70m and 4:1.

### 7.3. BANKSTOWN CITY PLAZA PROPERTIES

The Bankstown City Plaza sites have had no changes applied regarding their built form controls (HOB or FSR), with the only change proposed being the zoning. This undeniably has a significant impact on the value of these sites. Whilst from an urban design and interface perspective the BSC understand the limitations to intensification of these sites, simply prohibiting any form of residential accommodation will severely inhibit the realisation of redevelopment of these sites.

It is recommended the MU1 Mixed Use zone be retained and the height and FSR controls revert to the controls in the adopted Master Plan 2021, as follows:

- Height of Buildings: 6-8 storeys
- Floor Space Ratio: 3.5:1 - 4.5:1 FSR

Regarding proposed heritage significance of these properties, there appears to be conflicting proposals as to what sites have heritage significance and proposed for adding to the heritage schedule in the LEP. The Heritage report prepared by GML Heritage only recommends 6 Bankstown City Plaza to be heritage (Figure 10), however the extract drawing from SJB Urban Design Report and the Proposed Heritage Map (refer to Figure 11) suggests both 6 & 9 Bankstown City Plaza are proposed to be on the Heritage Map.

Figure 10 Map showing the proposed heritage items within the study area. (Source: GML Heritage)



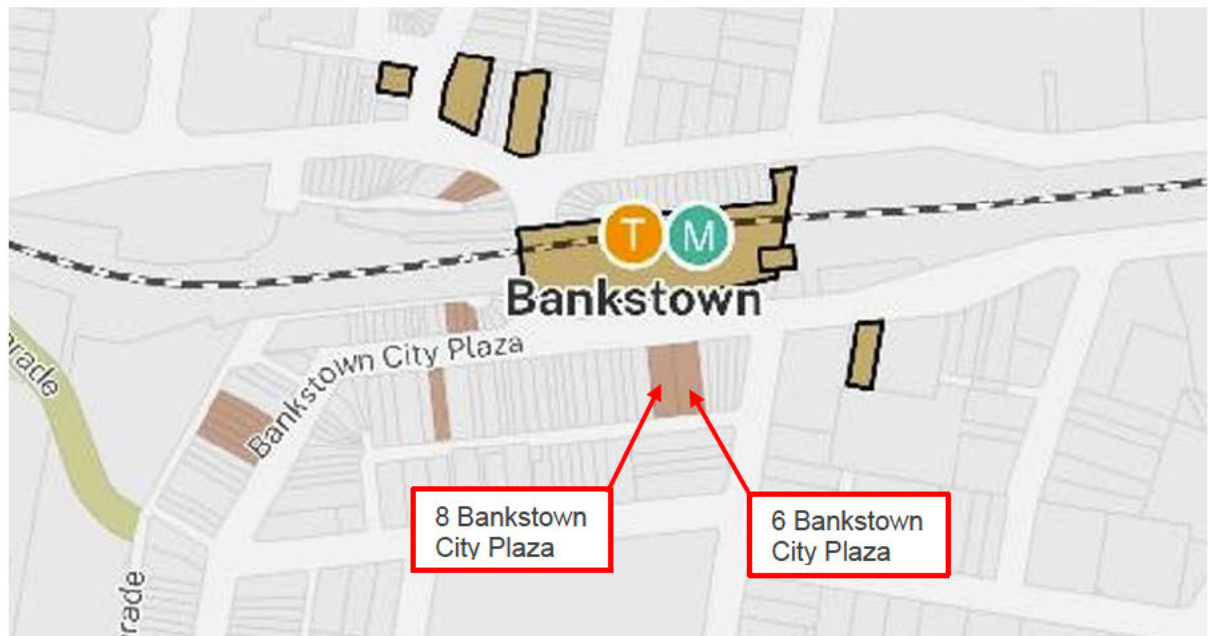


The GML Heritage report includes the following heritage recommendations for 6 Bankstown City Plaza:

- 6 Bankstown City Plaza meets the threshold for local heritage listing under historic significance (criterion a), historical association significance (criterion b), and aesthetic significance (criterion c).
- Only the façade above the awning at 6 Bankstown City Plaza is significant. The rear façade (to Stewart Lane) does not have significant characteristics.
- The site should be listed as a heritage item under Schedule 5 of the Canterbury Bankstown LEP 2023.
- Integrate the item into the townscape and rhythmic shopfront character of the Bankstown Shopping Centre area.
- The front façade requires repainting.
- When undertaking new works, the original shopfront should be reinstated or interpreted with a more sympathetic design.
- Conserve any original or significant interior features including during adaptive re-use or compatible use.

Clarification on which properties are proposed to be heritage listed is sought, noting the club will only support façade of 6 Bankstown City Plaza being identified as having heritage significance, consistent with the GML Heritage report.

Figure 11 Proposed Heritage Map



## 7.4. RESTWELL STREET PROPERTIES

The BSC have no objection to the proposed zoning and HOB controls for the Restwell Street sites, however we recommend that the same maximum FSR provision of 5:1 proposed to the neighbouring property on the corner of Raymond Street and Restwell Street be given to the club. This would

incentivise the realisation of the Restwell Street 'spine', nominated in the SJB Urban Design Report as being a critical north-south connection, with dedicated shared path (pedestrian and cycle) and bus corridor. Isolating uplift disincentives redevelopment and will inhibit the ability to realise the future vision of the Bankstown TOD Precinct.

The Council adopted Master Plan recommended heights of up to 18 storeys for the Restwell Street properties.

It is recommended the height and FSR controls be amended as follows:

- Height of Buildings: 18 storeys (or equivalent height in metres)
- Floor Space Ratio: 5:1 FSR

## **7.5. BOWLING CLUB SITE**

Pleasingly, despite the Bowling Club site being nominated in the Council's Master Plan as being designated for Public Open Space (despite currently being in private ownership and zoned RE2 Private Recreation), the site is proposed to retain its current Zone RE2 under the proposed rezoning. Despite not being part of the site, it is important to note that the Fig Trees located along Olympic Parade are nominated to be locally significant heritage items.

Noting the Zone RE1 land immediately adjacent the Bowling Club site, this presents a well-located opportunity for future residential redevelopment, noting however that the current and proposed zoning would restrict this. As such, the BSC contend that this site should be considered for rezoning or site-specific additional permitted use to enable high density residential.

It is recommended the zoning, height and FSR standards for the Bowling Club site be deferred from the finalisation of the Bankstown TOD Precinct rezoning, and a site-specific planning process be commenced in consultation with the BSC to devise appropriate planning controls, that envisage a mixed use and residential development with open space that enhances the public open space network, whilst including additional housing.

## **8. CONCLUSION**

BSC has one of the largest landholdings in Bankstown Town Centre. Acquired over many years, these sites represent a significant strategic opportunity for the growth of the Bankstown Town Centre, the BSC and the wider community. Recommendations made within this submission represent a significant opportunity for the State government to realise the intended goal of delivering housing in well located places. Accordingly, and as summarized above, the BSC submit that:

- Regarding the BSC site, the identified through site link locations be removed, and that the requirement be redrafted to simply require consideration for such linkages as part of any design excellence process. Reference to the site being a recreational facility should be removed from the Urban Design Study and any other documents, as the intent of this reference is unclear and ambiguous.
- Regarding the Greenfield Parade properties, the zoning of these sites must enable some form of residential accommodation, such as shop top housing to remain viable for future redevelopment and increase the development standards to a maximum height of building standard of 70m and maximum FSR of 4:1.
- The Restwell Street properties must be afforded the same FSR controls as the land immediately to the north of 5:1 FSR to enable the Restwell Street 'spine' nominated in the SJB Urban Design Report and heights of building standards nominated in the Council adopted Master Plan allowing buildings of 18 storeys in height.



- It is recommended the zoning of the Bankstown City Plaza properties be retained zoned MU1 Mixed Use zone be retained to enable some form of residential accommodation, such as shop top housing to remain viable for future redevelopment and the height and FSR controls revert to the controls in the adopted Master Plan 2021, as follows:
  - Height of Buildings: 6-8 storeys
  - Floor Space Ratio: 3.5:1 - 4.5:1 FSR
- The Bowling Club site should incentivise some sort of residential accommodation to encourage the future delivery of additional housing in well located places. It is preferable to adopt the density and FSR controls of surrounding MU1 Mixed use sites. It is recommended that the zoning, height and FSR controls for the Bowling Club site are deferred from the finalisation of the Bankstown TOD Precinct rezoning, and a site-specific planning process be commenced in consultation with the BSC to devise appropriate planning controls, that envisage a mixed use and residential development with open space that enhances the public open space network, whilst including additional housing.

If you require any further information from us in relation to this submission, please do not hesitate to contact Murray Donaldson, Director at [REDACTED] or myself at [REDACTED].

Kind regards,



Andrew Hobbs  
Associate Director

[REDACTED]  
[REDACTED]

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 11:14:54 AM  
**Attachments:** [sydney-anglican-property-submission---bankstown-tod\\_c.pdf](#)

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Submitted on Thu, 29/08/2024 - 11:12

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Tim

### **Last name**

Green

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Sydney 2000

### **Please provide your view on the project**

I object to it

### **Submission file**

[sydney-anglican-property-submission---bankstown-tod\\_c.pdf](#) (4.85 MB)

### **Submission**

Please refer to attached submission that includes a cover letter, submission report and attachments A-K for reference. Please note the PDF has been compressed to comply with the upload requirements. Please contact me if you would like a higher-quality version of the PDF.

Thanks.

### **I agree to the above statement**

Yes



## NSW Department of Planning, Housing and Infrastructure (DPHI)

23 August 2024

(Via NSW Planning Portal)

To whom it may concern,

### **BANKSTOWN TOD REZONING PROPOSAL SUBMISSION**

Thank you for the opportunity to provide a submission on the draft Bankstown Transport Oriented Development ('TOD') rezoning proposal ('the Proposal') that is on public exhibition from 16<sup>th</sup> July 2024 to 30<sup>th</sup> August 2024.

While Sydney Anglican Property (SAP) is very supportive of the TOD Program, we object in the strongest possible terms to the proposed heritage listing of St. Paul's Anglican Church located at 461 Chapel Road, Bankstown.

The justification for this view is summarised in this cover letter and explained in greater detail in the attached submission documents.

#### 1. Background

SAP is the landowner of 461 Chapel Road, Bankstown on Lots 26-28, Section A of DP 7058 (the Property). The Property is located in the Bankstown TOD precinct and is occupied by St Paul's Bankstown Anglican Church (St Paul's) within the Bankstown parish. SAP is the Trustee for all Anglican Church property in the Anglican Church Diocese of Sydney.

Section 2.11 of the *Bankstown – Transport Oriented Development Precinct Explanation of Intended Effect* ('EIE') outlines that DPHI has proposed to list the Property as a local heritage item based on the recommendations in GML Heritage's Heritage Significance Assessment Report (2024) commissioned by DPHI ('GML 2024 Report'). Our Property is indicated in the proposed heritage map in **Figure 6** of the attached report.

#### 2. Summary of heritage listing objections

SAP is strongly supportive of the TOD program and its aim to provide more well-located homes closer to transport, jobs and services. We certainly agree with the NSW Government that 'we need to work together to address the housing crisis'. To that end, SAP has submitted 11 projects for consideration under Housing Australia's HAFF program that would see ~1,000 social and affordable units being constructed on church land. Our property at St Paul's, Bankstown, is the proposed location of one of these critical developments.

We **fundamentally object** to the proposed heritage listing of our Property for the following reasons:

1. Listing would disqualify the Property from being considered in the first round of the Housing Australia Future Fund Facility(HAFFF) program. A proposal has been submitted to Housing Australia to use the Property for 139 social and affordable dwellings along with upgraded church and community facilities (see **Section 1.2** of the attached report).



2. It is inconsistent with previous Council deliberations and resolutions to not heritage-list the Property (see **Section 2.2** of the attached report).
3. It undermines previous heritage studies that did not propose heritage listing the site (see **Section 2.2** of the attached report).
4. Independent heritage experts have confirmed the site lacks heritage significance (see **Section 2.3** of the attached report).
5. The proposed listing would 'sterilise' the site and effectively relegate St. Paul's Anglican Church to being a "museum piece" rather than a vital part of the shared life of the broader local community (see **Section 2.4** of the attached report).

### 3. Conclusion

*The Environmental Planning & Assessment Act 1979* includes sharing of responsibility between different levels of government, and promotion of opportunities for public participation among its principal objects. The proposal to list the site as an item of local heritage would undermine a recent resolution of Council and ignore the process of public participation that supported the Council resolution.

As a Diocese, we want to honour the history of St Paul's Bankstown. However, the best way to do so is not by retaining items of low heritage significance, but by ensuring the site (and the congregation that meets there) is able to provide the local community with the kind of social infrastructure and care it will undoubtedly benefit from as it grows and develops for generations to come.

The local Bankstown congregation is overwhelmingly in support of the proposed redevelopment of its site and, as such, also objects to the site being heritage listed.

The proposed heritage listing would effectively relegate the site to the status of "museum pieces" at the expense of the many vibrant ministry and community activities that could otherwise be pursued on the site. Moreover, the associated maintenance costs would be a significant burden for the local congregation, putting the ongoing viability of St Paul's at real risk and further endangering the church's ability to minister to the local community.

Redevelopment of the site, on the other hand, would allow the delivery of modern, fit-for purpose facilities catering to the expected growth in the local population, including facilities that local community groups would be able to use. Without expanding and upgrading the church facilities on the site, they will have insufficient capacity to cater for the anticipated population growth in the parish (see **Section 1.1** of the attached report).

We believe the NSW Government and Sydney Anglican Property can work together to provide critical social and affordable housing in this location. This can be done in a way that simultaneously supports the existing congregation and serves the Canterbury Bankstown community now and into the future.

In accordance with a Heritage Interpretation Plan, we would be more than willing to photographically record and archive all the relevant buildings and contents on site. Particular items of interest (such as a selection of stained glass windows, timber trusses and plaques, signage, etc) could also be retained, reused or reimaged in the future buildings.

Thank you for your consideration of our request. We implore the DPHI to remove the proposed heritage listing from the Bankstown TOD proposal and reinstate Council's proposed masterplan controls for the site.

We would also welcome the opportunity to discuss this further or provide more information.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Ross Jones', with a stylized circular flourish at the end.

**Ross Jones**

CEO, Sydney Anglican Property



## **Bankstown TOD Proposed Rezoning Submission Report**

**August 2024**



**First published in Australia in 2024**

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## Contents

1	Strategic context .....	1
1.1	Background .....	1
1.2	Proposed use of the Property .....	2
2	Objections to the proposed heritage listing.....	7
2.1	Summary .....	7
2.2	Inconsistency with previous Council resolutions & heritage studies.....	7
2.3	Independent heritage experts confirmed lack of heritage significance. ....	9
2.4	Heritage listing would ‘sterilise’ the site .....	11
2.5	Heritage listing would rule out social and affordable housing .....	12
3	Conclusion .....	13

## Appendices

<b>Appendix A</b>	Bankstown City Council Notice of Interim Heritage Order (25 <sup>th</sup> November 2015)
<b>Appendix B</b>	Sue Rosen Associates Heritage Assessment for Bankstown City Council supporting heritage listing (February 2015)
<b>Appendix C</b>	GBA Heritage objection letter to Interim Heritage Order in response to Sue Rosen Associates Heritage Assessment (18 <sup>th</sup> February 2016)
<b>Appendix D</b>	Sue Rosen Associates Supplementary Heritage Report from Sue Rosen Associates (February 2016)
<b>Appendix E</b>	GBA Heritage updated objection letter to Interim Heritage Order in response to Sue Rosen Associates Supplementary Heritage Report (11 <sup>th</sup> April 2016)
<b>Appendix F</b>	Bankstown City Council meeting minutes extract confirming vote to remove the Interim Heritage Order (26 <sup>th</sup> April 2016)
<b>Appendix G</b>	Canterbury Bankstown Local Planning Panel Agenda (9 <sup>th</sup> and 10 <sup>th</sup> September 2021)
<b>Appendix H</b>	Canterbury Bankstown Council meeting minutes confirming second IHO could not be imposed (27 <sup>th</sup> June 2023)
<b>Appendix I</b>	Canterbury Bankstown Council Meeting Minutes (18 <sup>th</sup> April 2023)
<b>Appendix J</b>	Canterbury Bankstown Council meeting minutes confirming second IHO could not be imposed (27 <sup>th</sup> June 2023)
<b>Appendix K</b>	Weir Phillips objection to the TOD Proposal’s heritage listing 15 August 2024)
<b>Appendix L</b>	St Paul’s Bankstown Anglican Church Petition (11 <sup>th</sup> August 2024)

## 1 Strategic context

### 1.1 Background

Bankstown is already a significant urban centre. It is an established employment and transport hub for the surrounding Canterbury-Bankstown region in Sydney's southwest. The area is characterised by its multi-cultural and diverse community, with almost half of residents of greater Bankstown born overseas.

Bankstown has very low vacancy rates for private rental housing and, consequently, rapidly increasing median rents. Furthermore, the area is characterised by long waiting lists for social housing (typically more than 5 years). It is estimated that 1,100-1,200 new social and affordable homes are needed annually in the Canterbury-Bankstown LGA to meet this demand. Older people aged 55+ and key workers renting privately in the surrounding area represent cohorts in need of affordable rental housing options. A summary of housing indicators for Bankstown can be seen below in **Figure 1**.



**Figure 1:** Bankstown housing indicators

Sydney Anglican Property (SAP) is the landowner of 461 Chapel Road, Bankstown NSW 2164 on Lots 26-28, Section A, DP 7058 ('the Property'), which is occupied by St Paul's Bankstown Anglican Church ('St Paul's') within the Bankstown parish. Our Property is within the Bankstown TOD precinct, as indicated in **Figure 2**.

From an Anglican parish perspective, using DPHI population projections overlayed with the Bankstown parish boundaries, the population of the Bankstown Parish will grow from 36,825 in 2026 to 57,268 in 2056. To accommodate just 2% of that population in St Paul's, an auditorium able to seat ~460 people would be required to meet demand if four services were running each Sunday. The current auditorium seating capacity is 180. The existing church building therefore provide insufficient space for the growing community in the Bankstown Parish.





**Figure 2: St Paul's location context**

## 1.2 Proposed use of the Property

Prior to the TOD program being developed, SAP has been working with Canterbury-Bankstown Council on the Bankstown City Centre Master Plan. As noted in **Section 1.1** there is a significant need for both social and affordable housing and to expand the capacity and facilities of the church building to meet current and future demands. A concept was developed by SAP (in consultation with Council) and was included in Council's Planning Proposal. With no heritage constraints on the Property, SAP made a submission in early 2024 to Housing Australia for the Property to be considered (along with 10 other church sites) for consideration as part of the Housing Australia Future Fund Facility (HAFFF) program.

The intent is to redevelop the site to provide significantly upgraded and fit-for-purpose church facilities that can also be used as community facilities for performing arts, public meetings and cultural events. Additionally, the development would provide 139 residential units that would be 100% social and affordable housing – well above the 15% requirements under the TOD principles.

SAP has identified two main cohorts for this housing to focus on (**Figure 3**):

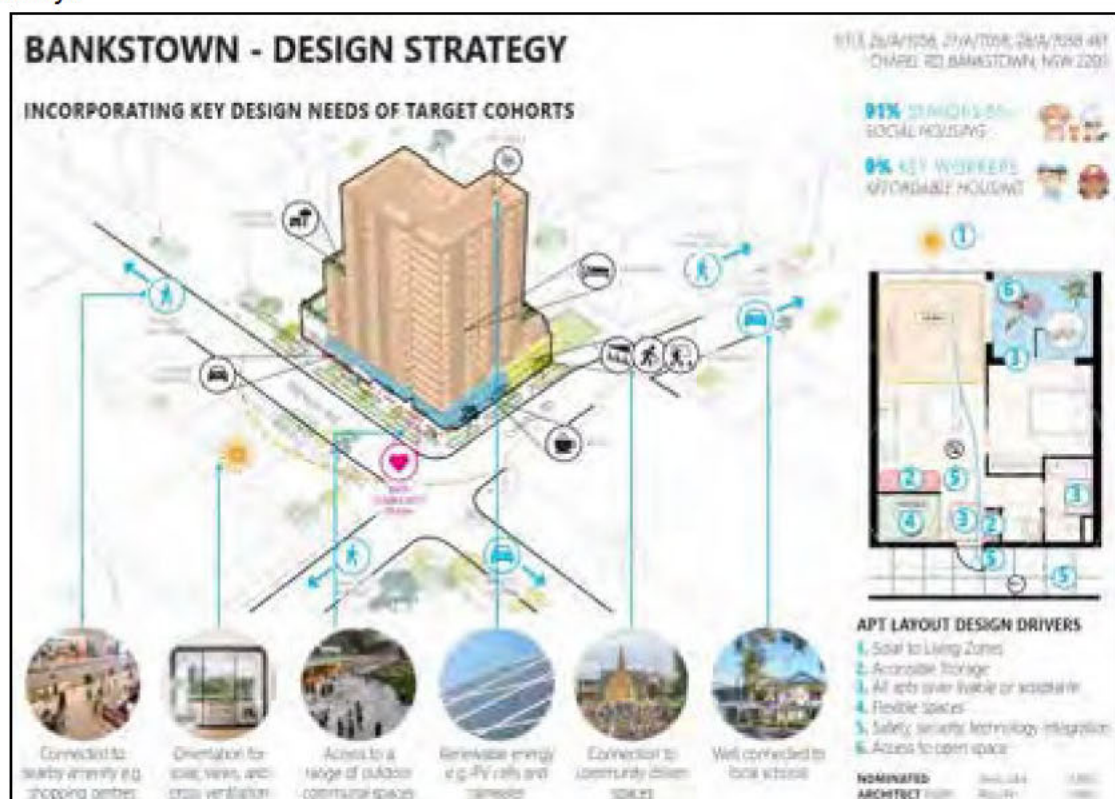
1. Single people aged over 55 years
2. Key workers.





**Figure 3: The target cohorts**

The proposed mix of housing units in the development would be 91% social housing supporting seniors and 9% affordable housing supporting key workers. A schematic of the proposed development can be seen at **Figure 4** and an artist's impression at **Figure 5**. Many of the “seniors” cohort are single women who have been left in financial stress and/or women fleeing domestic violence. SAP would develop the site and partner with our sister organisation (Anglicare) who would operate the facilities and provide wrap-around services needed by the residents. Both are not-for-profit organisations seeking to develop the site to provide critical social infrastructure for the benefit of the local community.



**Figure 4: Proposed redevelopment schematic**

The *Bankstown – Transport Oriented Development Precinct Explanation of Intended Effect* ('EIE') identifies in Section 2.11 that DPHI proposed to list the Property as a local heritage item. This appears to be based on the recommendations in GML Heritage's Heritage Significance Assessment Report (2024) commissioned by DPHI ('GML 2024 Report'). Our Property is indicated in the proposed heritage map included at **Figure 6**.

If the proposed listing was enacted, the proposed re-development of the site would not be considered further by Housing Australia in Round 1 of the HAFF program. This is due to the risk and uncertainty the heritage listing would create in terms of the planning approval path.

Without HAFF support, there is no funding path to pursue the proposed re-development which would result in the proposal being shelved indefinitely. This would negate the opportunity to upgrade church facilities and forego 139 social and affordable dwellings, the very outcome the TOD program was designed to accelerate.

#### Heritage is more than just the built form

The remainder of this submission explains the range of reasons for our objection to the heritage listing for this site. It should, however, be noted that SAP is seeing a growing and concerning tendency of heritage specialists focusing exclusively on the built form and not on the cultural significance of churches (refer to the Burra Charter 1979). It seems that many heritage specialists fail to understand that Anglican church buildings were constructed to facilitate the public worship of God, and as a base for charitable works. The current St Paul's church building is no longer fit-for-purpose for modern church meetings and does not provide sufficient capacity for future population growth. Therefore, the building is no longer enabling or facilitating the core purpose but has become a barrier to the very activity that created its cultural value in the first place.



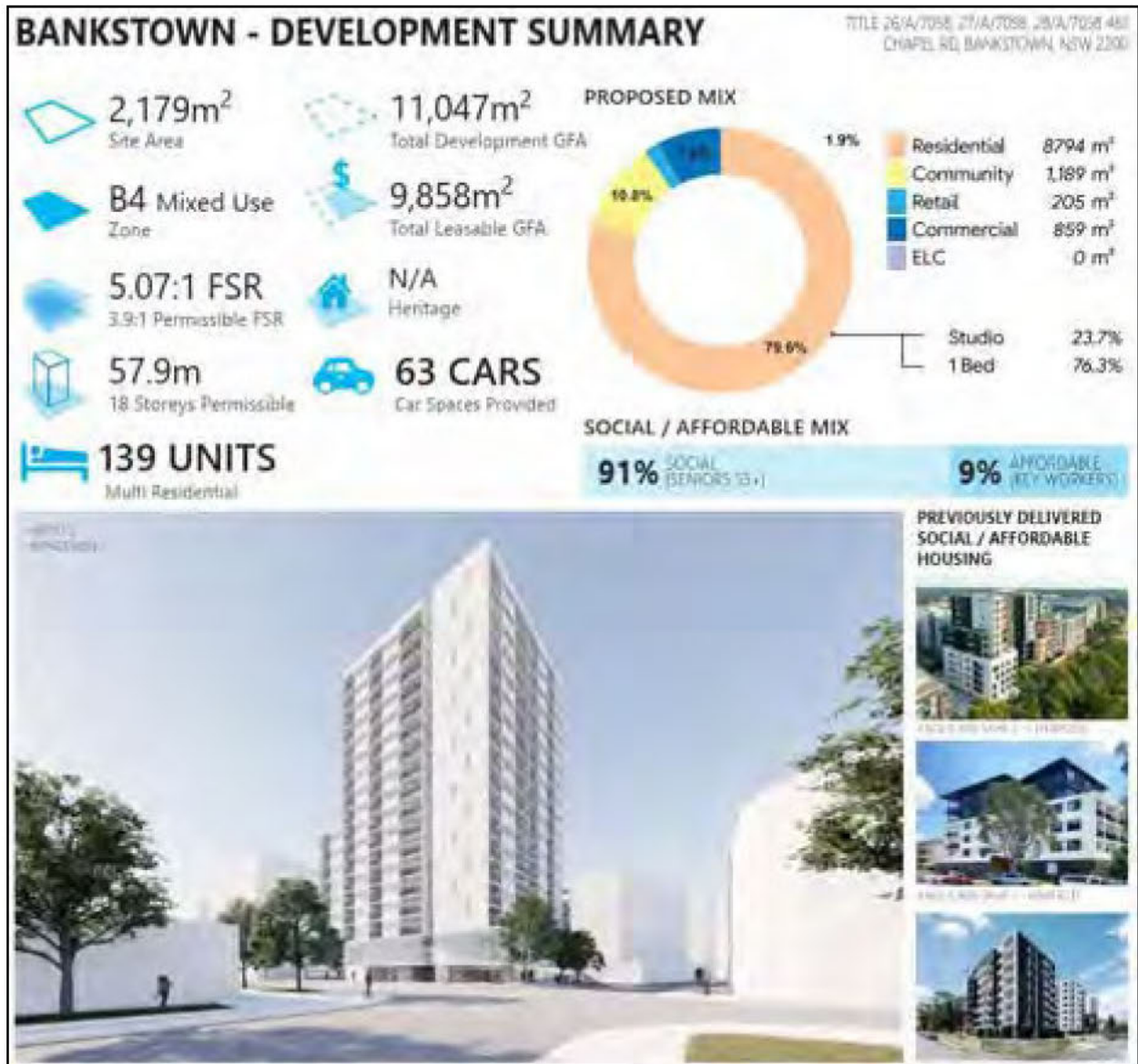
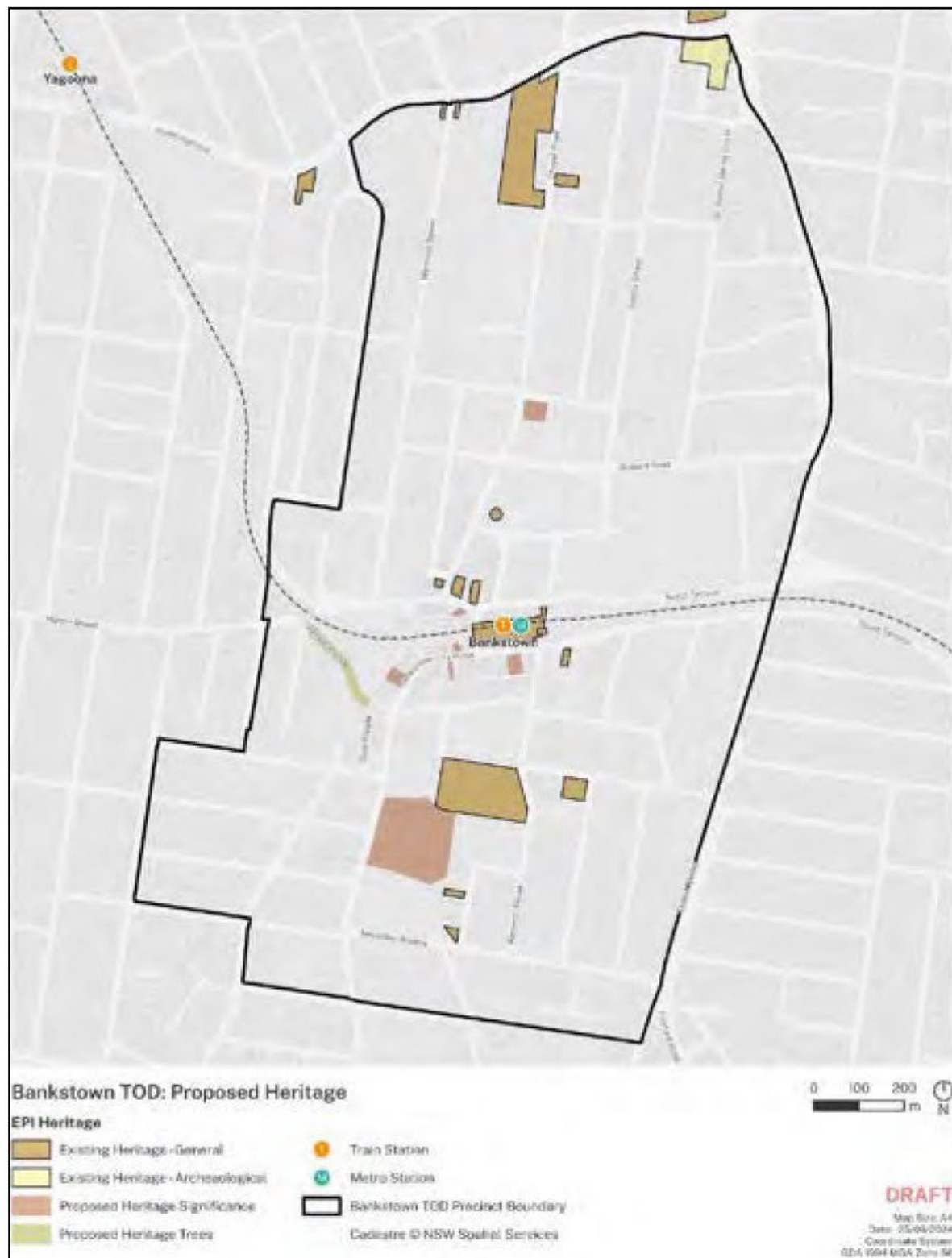


Figure 5: Proposed development summary



**Figure 6:** Location of St Paul's within Bankstown TOD Proposed Heritage Map



## 2 Objections to the proposed heritage listing

### 2.1 Summary

SAP is very supportive of the TOD program and its aim to provide more well-located homes closer to transport, jobs and services. We certainly agree with the NSW Government that ‘we need to work together to address the housing crisis’.

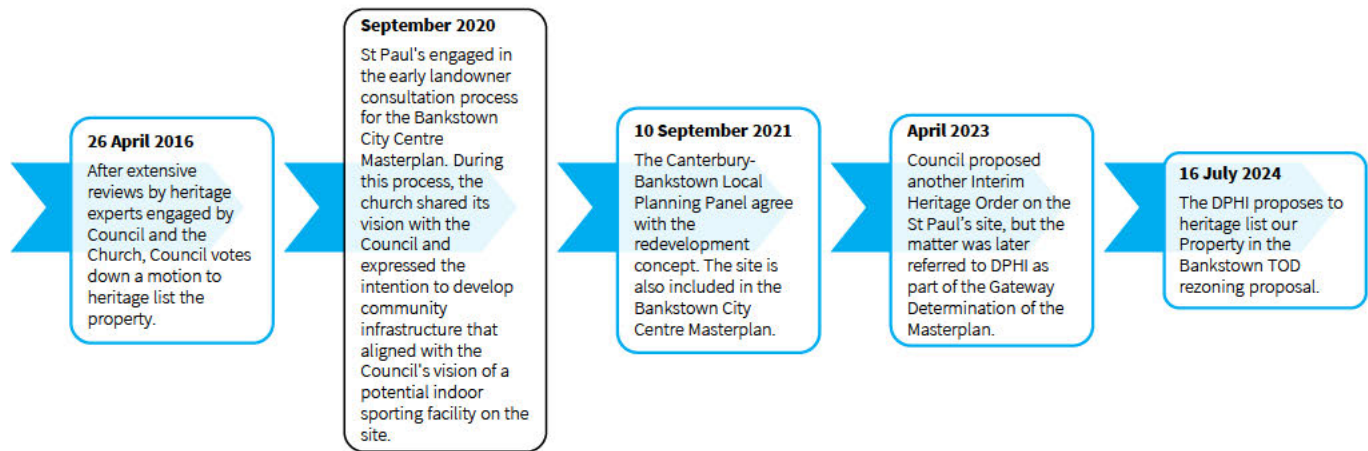
**We fundamentally object to the proposed heritage listing of the property because:**

1. Listing would disqualify the Property from being considered in the first round of the Housing Australia Future Fund Facility(HAFFF) program. SAP has submitted 11 projects for consideration under Housing Australia’s HAFF program that would see ~1,000 social and affordable units being constructed on church land. The current SAP proposal at St Paul’s Bankstown is one of those projects and represents 139 social and affordable dwellings along with upgraded church and community facilities (see Section 1.2).
2. It is inconsistent with previous Council deliberations and resolutions to not heritage list the Property (see **Section 2.2**).
3. It undermines previous heritage studies that did not propose to heritage list the site (**Section 2.2**).
4. Independent heritage experts have confirmed the site lacks heritage significance (see **Section 2.3**).
5. The proposed listing would ‘sterilise’ the site and effectively relegate St. Paul’s Anglican Church to being a “museum piece” rather than a vital part of the shared life of the broader local community (see **Section 2.4**).

These reasons are explained in more detail below.

### 2.2 Inconsistency with previous Council resolutions & heritage studies

The EIE for the rezoning bases its recommendation that the site should be included in the LEP for heritage listing based on the GML 2024 Report. The GML 2024 Report, however, makes no reference to these lengthy Council deliberations in 2015-2016 nor the extensive evidence prepared by heritage experts during this process. See **Figure 3** followed by a detailed summary of this history and previous engagement with the local Council on this issue.



**Figure 3: Summary of the history of attempted heritage listing of the Property**

### **Key History**

1. In November 2015, Bankstown City Council made an Interim Heritage Order ('IHO') for the site (refer to **Appendix A**). This was based on a 2015 Heritage Assessment by Sue Rosen & Associates ('SRA') (refer to **Appendix B**), which concluded that it qualified for listing as an item of local heritage significance.
2. In February 2016, an objection letter to the proposed heritage listing of the site was submitted by Graham Brooks, Director of GBA Heritage ('GBA') (refer to **Appendix C**). SRA subsequently provided a Supplementary Heritage Report the same month (refer to **Appendix D**), to which GBA responded in April 2016 with an updated objection letter (refer to **Appendix E**).
3. On 26<sup>th</sup> April 2016, following this lengthy and detailed consideration of the potential local heritage significance of the site, Council voted against a motion to submit a planning proposal to list the St Paul's Anglican Church site as a heritage item (refer to Item 5.3 in Council's meeting minutes in **Annexure F**).
4. Following Council's decision, extensive planning and coordination have taken place between St Paul's, the Diocese, and Council to align any redevelopment with the Bankstown City Centre Masterplan.
5. On 9<sup>th</sup> and 10<sup>th</sup> September 2021, the Canterbury Bankstown Local Planning Panel again supported our redevelopment concept by not including our Property as an additional heritage item for investigation (refer to pages 45-46 in the Panel's meeting agenda in **Appendix G**).
6. On 18<sup>th</sup> April 2023, Canterbury-Bankstown Council reconsidered an IHO and deferred this decision for the Council meeting on 27<sup>th</sup> June 2023 (refer to Item 10.2 in Council's meeting minutes in **Appendix H**).
7. On 4<sup>th</sup> May 2023, Council staff inspected the site with representatives from St Paul's, SAP, Sustainable Development Group (a not-for-profit development management and advisory organisation), and Church-engaged heritage advisors from GBA.
8. On 5<sup>th</sup> June 2023, GBA provided an updated IHO objection letter for Councillors (refer to **Appendix I**).
9. On 27<sup>th</sup> June 2023, Council met and confirmed that a second IHO on the same site could not be imposed and that the site would be reviewed as part of a heritage study for the draft Bankstown City Centre Masterplan that was being assessed by DPHI for Gateway Determination (see Item 5.1 in Council's meeting minutes in **Appendix J**).



10. In early 2024, Council completed a heritage study prepared by Extent Heritage ('Extent Heritage 2024 Report') which included the St Paul's site and recommended it for heritage listing. The Extent Heritage 2024 Report was provided to the DPHI as part of the Proposal but was not made public by DPHI.
11. On 16<sup>th</sup> July 2024, DPHI exhibited the Proposal which proposed the heritage listing of our Property. The DPHI commissioned a peer review of the Extent Heritage 2024 Report by GML Heritage who supported the proposed heritage listing of the St Paul's site by Extent Heritage ('GML 2024 Report').
12. It is noteworthy that Extent Heritage completed a similar heritage study for Council in 2021-22 that had excluded our Property for heritage listing, as noted in page 15 of the GML 2024 Report; it was only included following the defunct IHO in 2023.
13. A request to Council for the Extent Heritage 2024 Report has been denied as 'it is not available to the public'. SAP has therefore submitted a GIPA request to Council for a copy of the Extent Heritage 2024 Report and are yet to receive it at the time of this submission, so, unfortunately, we are not able to review this critical document (given the GML 2024 Report relied upon by DPHI for the Proposal is a peer review of the Extent Heritage 2024 Report) and provide a response to this original report as a part of this submission.
14. The *Environmental Planning & Assessment Act 1979* includes sharing of responsibility between different levels of government, and promotion of opportunities for public participation among its principal objects. The proposal to list the site as an item of local heritage would undermine a recent resolution of Council and ignore the process of public participation that supported the Council resolution.

### 2.3 Independent heritage experts confirmed lack of heritage significance.

SAP has now had two independent heritage consultants (GBA Heritage in 2016/2023 and Weir Philips in 2024) conclude that the property does not meet the State Heritage Inventory's criteria for Local Heritage Significance.

GBA's arguments (**Appendix C and E**) is summarised as follows:

- The Sue Rosen Associates Report (2016) failed to address architectural and planning inadequacies resulting from an incomplete building project and the lack of justification based on the architect's other works.
- The Sue Rosen Associates Report (2016) has questionable conclusions regarding the architectural expressions of different sections, highlighting their lack of harmony. The claim that the junction between the 1938 section and the post-war Rectory reflects the original design intent was dismissed as an unskilled attempt lacking architectural competence.
- The Sue Rosen Associates Report (2016) assessment does not adhere to the rigorous assessment criteria established by the NSW Heritage Council.
- Overall, the Sue Rosen Associates Report (2016) overlooked both the lack of architectural integrity and aesthetic creativity in the existing buildings compared to the original master plan for the site.

GBA's letter also made the following conclusions about St. Paul's lack of heritage significance:



- The addition made to the building in 1958 has negatively impacted its heritage significance by removing key elements of the original 1938 structure and adding a different style of building that is unsympathetic to both original styles. This has also caused obstructed views of the original section from the public realm.
- The architect's importance and the church's significance are deemed to be low.
- The building lacks historical, aesthetic, social, and research value, and does not meet the criteria for heritage listing.
- It is recommended that the building not be retained.
- Previous reports and assessments provide sufficient information, and there is no need for further investigation. Consequently, the *Heritage Act 1977*'s requirements are not satisfied, and an IHO should not be made.

A summary of the argument in Weir Phillips' 2024 report against heritage listing is as follows:

- St Pauls Anglican Church is an example of an Inter-war Church with major later additions, designed by ecclesiastical architect Norman Welland McPherson. The church lacks the architectural cohesion and intactness found in many of McPherson's other works, a number of which are listed as heritage items. The church's hybrid style, combining Inter-war and Post-war elements, is awkward and does not demonstrate high creative or technical achievement.
- The church's interior, though spatially appreciable, lacks innovation and technical excellence. The dedication to WWII soldiers, while having significance, is typical of many churches. Such memorials are associated with the congregation, as noted above. The church's association with its congregation is typical of most churches and does not indicate any unique significance. The architectural typology as a church is not rare, as there are already numerous listed churches and church halls in the LGA. **St Pauls Anglican Church should not be heritage listed for several reasons:**
  - Lack of Architectural Integrity: The church's later additions disrupt the original design intent, leading to a lack of visual cohesion. This compromises the original architectural vision as intended by McPherson.
  - Hybrid Style: The transition between Inter-war and Post-war styles is awkward and does not represent a high degree of creative or technical achievement.
  - Unremarkable Interior: The interior lacks innovation and technical excellence, with utilitarian steel I-beams replacing the original timber trusses. The church lacks any technical or creative achievement in terms of its construction methodology for the period.
  - Diminished Community Association: The church's connection to its congregation is typical and not unusually strong or distinctive when compared with other social or religious groups in the locality.
  - Well-Represented Typology: The church typology is not rare within the LGA, which already has numerous heritage listed churches and church halls.



In its current altered state, St Pauls Anglican Church Bankstown does not meet the threshold for heritage listing under the Heritage NSW criteria for heritage listing as a local heritage item under the Canterbury-Bankstown Local Environmental Plan (LEP) 2023.

## 2.4 Heritage listing would 'sterilise' the site

The Sydney Anglican Diocese is clear in its conviction that the local church is primarily the gathered congregation of people and not the building in which they meet. As such, it is important that any buildings managed by the St. Paul's congregation actually serve the church community (and its ministry into the local community) not the other way around. Without the opportunity to redevelop the site this aged and already inadequate facility will diminish in its ability to meet community needs (such as the Food Pantry, ESL classes and so forth), as well as the ongoing ministries of the church. This is explained in more detail below.

1. A heritage listing would decrease flexibility and increase maintenance costs that would threaten the financial viability of the church community. The buildings on our Property are not in good condition and already require high maintenance costs which are increasingly prohibitive for the St Paul's congregation.
  - a. It should be noted that Anglican Churches in the Sydney Diocese do not receive any centralised funding. Each parish needs to be financially sustainable using post-tax offerteries from parishioners to fund minister stipends, building maintenance and upgrades, and charitable ministry initiatives.
  - b. The higher the building maintenance costs in a parish budget, the less that is available for charitable ministries.
  - c. The unintended consequence of heritage listing is that it would fundamentally threaten the continuing use of the site and its living heritage of people that created it cultural heritage in the first place. It would be a travesty to inadvertently reduce the ongoing cultural heritage of this place and to prevent its ongoing public benefit to the Bankstown community.
2. As stated previously, heritage listing is likely to result in a shelving of current and active redevelopment plans that would:
  - a. enable the church to develop fit-for-purpose facilities that help the church to continue operating on the Property and serve more people in the community. Importantly, St Paul's and the Diocese intend to retain ownership of the site to continue ministry and community services, ensuring St Paul's can serve future generations in Bankstown and enabling the preservation of living heritage on the site for generations to come.
  - b. enable the church to cater for the projected increase in parish population from 36,825 in 2026 to 57,268 in 2056. To accommodate just 2% of that population in St Paul's, the church would need to be able to seat 1,145 people over four services on a Sunday. Using the usually church pattern of service sizes, this would require an auditorium able to seat ~460 people. The current auditorium capacity is 180 which is totally inadequate for future demand.



3. Heritage listing restricts redevelopment plans for community facilities that would benefit the Bankstown community beyond St Paul's. The proposed development of the Property has been designed in consultation with Council and would include multipurpose use of the church auditorium and associated halls and meeting rooms. Other uses include performing arts, cultural events and conference facilities.

## 2.5 Heritage listing would rule out social and affordable housing

The urban centre of Bankstown is an established employment and transport hub for the surrounding Canterbury-Bankstown area. The area is characterised by its multi-culturally diverse community. There are very low vacancy rates for private rental housing and rapidly increasing median rents. There are long waiting lists for social housing, typically more than 5 years, with more than 2350 families on the waiting list for social housing in the Bankstown Allocation Zone. It is estimated that 1,100-1,200 new social and affordable homes are needed annually in the Canterbury-Bankstown LGA to meet demand. Older people aged 55+ and key workers renting privately in the surrounding area are notable cohorts in need of affordable rental housing options.

Following the resolution of the process to investigate the potential local heritage significance of the site, SAP pursued plans to redevelop the site for the dominant purpose of social and affordable housing and the inclusion of upgraded, fit-for-purpose church facilities, with the auditorium able to be used for community concerts and events. These plans are strongly supported by the vast majority of the local congregation, with the existing site being poorly utilised and unfit for the needs of the congregation or wider community. This is evidenced by the recent petition signed by 102 congregation members calling for the removal of the proposed heritage listing of our Property from the Proposal (refer to **Appendix L**).

SAP has now prepared plans for the site which will provide 139 social and affordable dwellings, with 91% social housing directed towards seniors, and 9% affordable housing designed for key workers. This concept was included in Council's own Bankstown City Centre Master Plan and Planning Proposal. Notably, SAP has submitted this development as one of its sites for consideration by Housing Australia as part of the HAFFF initiative, in partnership with Anglicare as the operating community housing provider. This was on the basis that there were no heritage constraints associated with the site. Notably, both SAP and Anglicare are not-for-profit organisations seeking to develop the site to provide critical social infrastructure for the benefit of the community.

The *2024 Draft Bankstown TOD Rezoning - Urban Design Framework* states that "Housing Delivery" is one of the TOD Precinct Principles. Not only does the proposed heritage listing go against this key principle, the principle only requires up to 15% affordable housing, whereas our project is seeking to deliver 100% of all residential dwellings for social and affordable housing. Furthermore, it addresses other TOD Precinct Principles including "Community Infrastructure".

The *Environmental Planning & Assessment Act 1979* provides that the planning system should operate "to promote the orderly and economic use and development of land" and "to promote the delivery and maintenance of affordable housing". The proposed inclusion of the site as an item of local heritage significance would sterilise the use of the site, and directly contradict the objects of the planning system and the purpose of the Proposal in frustrating opportunities for urgently needed social and affordable housing in the throes of a housing crisis.

### 3 Conclusion

On the grounds of the reasons detailed in this submission, Sydney Anglican Property recommends that:

- a) The Department removes the proposed heritage listing of St. Pauls Anglican Church from the Bankstown TOD proposal; and
- b) Reinstate Council's proposed masterplan controls for the site.

We believe the NSW Government and Sydney Anglican Property can work together to provide critical social and affordable housing in this location. This can be done in a way that simultaneously supports the existing congregation and serves the Canterbury Bankstown community now and into the future.

In accordance with a Heritage Interpretation Plan, we would be more than willing to photographically record and archive all the relevant buildings and contents on site. Particular items of interest (such as a selection of stained glass windows, timber trusses and plaques, signage, etc) could also be retained, reused or reimagined in the future buildings.

We do want to honour the history of St Paul's Anglican Church. Yet, due to its low heritage significance, we believe this history is best celebrated by a sensible redevelopment that includes a new church space and vital social and affordable housing for the community. This would be a better outcome than sentencing this local church to ruin by requiring the rigid preservation of tired buildings.

For reference, please refer to Appendices A – K.



# ***Appendix A***

Bankstown City Council Notice of Interim  
Heritage Order (25th November 2015)



## ***Appendix B***

Sue Rosen Associates Heritage Assessment for  
Bankstown City Council supporting heritage  
listing (February 2015)

## ***Appendix C***

GBA Heritage objection letter to Interim Heritage  
Order in response to Sue Rosen Associates  
Heritage Assessment (18th February 2016)

## ***Appendix D***

Sue Rosen Associates Supplementary Heritage  
Report from Sue Rosen Associates (February  
2016)

## ***Appendix E***

GBA Heritage updated objection letter to Interim  
Heritage Order in response to Sue Rosen  
Associates Supplementary Heritage Report (11th  
April 2016)



## ***Appendix F***

Bankstown City Council meeting minutes extract  
confirming vote to remove the Interim Heritage  
Order (26th April 2016)

# ***Appendix G***

Canterbury Bankstown Local Planning Panel  
Agenda (9th and 10th September 2021)

## ***Appendix H***

Canterbury Bankstown Council meeting minutes  
confirming second IHO could not be imposed  
(27th June 2023)

# ***Appendix I***

Canterbury Bankstown Council Meeting Minutes  
(18th April 2023)



## ***Appendix J***

Canterbury Bankstown Council meeting minutes  
confirming second IHO could not be imposed  
(27th June 2023)

## ***Appendix K***

Weir Phillips objection to the TOD Proposal's  
heritage listing 15 August 2024)







- display any notice or advertisement on the place, building, work, relic, moveable object or land, or in the precinct;
- damage or destroy any tree or other vegetation on or remove any tree or other vegetation from the place, precinct or land.

If you are intending to undertake any of the above activities, a development application must be lodged with Council.

For any routine maintenance works during the next 6 months, it is recommended that you write to Council to seek confirmation as to whether the proposed works require development consent.

In terms of next steps, Council has 6 months to decide whether to list the church as a local heritage item in Council's Local Environmental Plan. It is proposed to report the matter to the Council Meeting in March 2016.

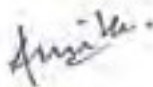
There is an opportunity for you to review the heritage inventory that informed the Interim Heritage Order, and to make a written submission outlining your position as to whether Council should list the church as a local heritage item. Council will require your submission by 19 February 2016 if we are to include it as part of the Council report.

To assist you, Council officer Amita Maharjan has emailed you an electronic copy of the heritage inventory, along with the information on the 'criteria for heritage assessment' prepared by the NSW Office of Environment & Heritage.

Council encourages you to seek the services of a qualified heritage architect or planner to advise you on the information supplied by Council.

If you have any enquiries or require further information, please contact Council officer Amita Maharjan on 9707 9806.

Yours sincerely,



**Amita Maharjan**  
Strategic Planner



# NSW State Heritage Inventory form

ITEM DETAILS						
Name of Item	St Pauls Anglican Church					
Other Name/s Former Name/s						
Item type (if known)	Built					
Item group (if known)	Religion					
Item category (if known)	Church, Rectory and Church Hall and ancillary buildings					
Area, Group, or Collection Name	St Paul's Anglican Church Complex					
Street number	459					
Street name	Chapel Road					
Suburb/town	Bankstown				Postcode	2200
Local Government Area/s	Bankstown					
Property description	Lots 26A, 27A and 28A DP 7058 Parish of Bankstown, County of Cumberland					
Location - Lat/long	Latitude				Longitude	
Location - AMG (if no street address)	Zone		Easting		Northing	
Owner	Anglican Church Property Trust Diocese of Sydney					
Current use	Church					
Former Use	Part of subdivision					
Statement of significance	<p>The precinct of St Pauls is locally historically significant due to its capacity to demonstrate the historic themes of "Towns, suburbs and villages", "creative endeavour", "Religion" and "Birth and Death". It has local historic associative significance due to its association with both prominent and less prominent Bankstownians with that association documented on the walls, in the windows and the furniture and fittings of the church. Its very existence is the product of local endeavour, fundraising and support for the church and parish. It has local aesthetic significance due not only to its landmark status near the civic centre but as an example of the work of N.W. McPherson. It is also socially significant to an identifiable local group for spiritual, social and cultural reasons as testified by their actions in relation to a perceived threat to the precinct. It is also of technical and research significance as a example of Church architecture with an unusual connection of the</p>					



# NSW State Heritage Inventory form

	rectory with the church, this feature also lends the building significance under the rarity criteria, rarity is also augmented by the survival of the entire complex from its inception as a parish in the second decade of the twentieth century. The Church with its activities and functions embodied in the complex also has representative significance.	
Level of Significance	State <input type="checkbox"/>	Local <input type="checkbox"/> ✓
<b>DESCRIPTION</b>		
Designer	Norman Welland McPherson	
Builder/ maker	Not Known	
Physical Description	<p>The St Paul's precinct comprises the church, church hall, and rectory, together with lavatory blocks and a garage. There is frontage to Chapel Road and French Avenue. There is lawn and some plantings on the French Avenue frontage.</p> <p><b>The Church</b></p> <p>The church was built between 1938 and 1961 to the design of architect Norman Welland McPherson (1901-1979). It is essentially of the inter-war era, modernized where thought necessary, and the centre piece of McPherson's development scheme that comprised the church flanked by the rectory and church hall sited at the rear, each with a screened garden.</p> <p>Constructed in face brick with terracotta Marseille pattern roofing tiles, the church comprises a bell tower (1961), north porch (1961), west gallery (1961) narthex (1961), nave (mostly 1938 with two bays added in 1961), and chancel with canted apse (1938). The architectural style is Inter-War Romanesque.</p> <p>The robust west front is relieved by vertical bands of narrow, white glazed tiles, and brick pilasters continued up to the gable, with the walls terminating at raked glazed panels. There is diminutive centred west door entry from Chapel Road. The tower with bellfry has the same brick pilasters and inlaid tiles. The east end has a canted apse.</p> <p>The dichromatic face brickwork is laid in stretcher bond. The upper section of brick wall below the roof line has a decorative panel of vertical bricks. There are brick corbels and engaged pillars. The gabled roof has boxed eaves. At the rear of the nave on the north and south sides of the external wall are toothed for the brick screens proposed by McPherson, but not built.</p> <p>The windows, paired in the nave, have a brick margin and brick mullion, and with a pointed arch. The windows are steel framed</p>	

# NSW State Heritage Inventory form

	<p>with leaded lights, mostly pictorial.</p> <p>Internally, the walls are face brick and the floor is timber boarding. The roof is open with muscular king post trusses. The ecclesiastical furniture includes the marble font with timber cover, pulpit, altar rail, altar table and platform, and seating. There is an organ and organ loft on the south side, and choir gallery on the north side of the nave. The organ is not listed in GD Rushworth's 'Historic Organs of New South Wales (1988) and would require further investigation into its maker.</p> <p><b>The Rectory</b> The rectory is a single storey brick dwelling sited at the rear of the property with frontage to French Avenue. It has a gabled roof with timber shingled gable ends. Unusually, the rectory abuts the church chancel, and this was a feature of McPherson's proposed layout for the church. The windows are timber framed casements. The architectural style is Inter-War Old English.</p> <p>On the west end there is a later addition with a gabled end sheeted in fibrous cement.</p> <p><b>Church Hall</b> The church hall is the original weatherboard church erected about 1914 with a brick west end added in 1961. The gable roof is of a shallower pitch than depicted in photographs of the inter-war era, and therefore was altered probably about 1961. The timber frames, external architraves and sills of the windows seem early, but the sashes have been replaced. While McPherson proposed a church hall on the south side, his intention was for a new brick structure at the rear of the site.</p> <p>On the east end there is an addition to the hall with battened fibrous-cement sheeting. The building looks like a former hut of the Second World War era.</p>					
Physical condition and Archaeological potential	The structures are in from excellent to fair condition. Given its development and disturbance history the site is unlikely to have archaeological potential.					
Construction years	Start year	c.1914 - 1920 1938	Finish year	c.1914-1920 1939	Circa	<input checked="" type="checkbox"/>
Modifications and dates	<p>c. 1914-1920 – Timber Church constructed</p> <p>c.1926 - 1928 – Choir stalls and vestry added to the church</p> <p>1938 – new brick church constructed. Foundation stone laid 22 October 1938.</p>					





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	<p>c. 1958 – extension to brick church</p> <p>1960 – church hall extended to within 12ft of Chapel Road boundary. This became the Front Hall. It was the original church building</p> <p>1967 Church hall kitchen redesigned and renovated</p> <p>1969 – The front of the hall facing Chapel Road was brick veneered to match the brick church.</p> <p>1970 – rectory extended on Chapel Road frontage to accommodate meetings and Sunday School classes. [BCC: P/32/199/459/26]</p>
<b>Further comments</b>	<p>There are claims that the timber Church, now used as a hall was first constructed as late as 1920, other claims date as early as 1912. However the land was not acquired until 1914.</p>

## HISTORY

### Historical notes

#### **1 Richard Morgan's Grant**

St Paul's Anglican Church is situated on part of the 50 acre portion 48 of the Parish of Bankstown granted to Richard Morgan in March 1831. This grant ran south from Liverpool Road and was one of some 30 grants made in Bankstown that year. [LPI: CT: Vol. 2412 Fol. 67] Some 30 years later, the grant was dissected by Chapel Road which was created to connect farms in southern Bankstown to Liverpool Road and access to city markets. Chapel Road, which was officially confirmed on 27 March 1860, cut a north-south transect through Morgan's grant. The intersection of Liverpool Road and Chapel Road, which Morgan's Grant abutted on the south, became the focus of commercial and administrative activity for Bankstown. Bankstown Post Office, St Felix's Catholic Church and School were established there and the first Bankstown Council Chambers were also established in the vicinity. [Sue Rosen, *Bankstown: A Sense of Identity*, Hale & Iremonger, Sydney, pp.47-59]

#### **2 The Church of England in Early Bankstown**

In 1856 the Church of England called for the establishment of an Anglican school at Bankstown and in 1861 a one-room school, St Matthews, was established on Liverpool Road in the Bankstown Village Reserve on the northern side of Liverpool Road, in present day Yagoona. In its early years the school had difficulties maintaining student numbers and retaining staff despite some 400 people including 80 children resident within a 2.5 mile radius. Most families were poor, living by selling firewood or on small farms. Attendance problems continued into the late 1860s and 1867 the School Board offered the premises to the State Council of Education for use as a state school. The Council took up the offer and St Matthews closed in May 1868 to open in July as Bankstown Public School. The building continued to serve as a church until the establishment of St. Pauls when the focus of Bankstown moved south, closer to the newly established railway. [Sue Rosen, *Bankstown: A Sense of Identity*, Hale & Iremonger, Sydney, pp.50-53]

#### **3 The Impact of the Railway**

The establishment of the railway was the single most important factor to influence the development of modern Bankstown. In December 1906, the Authorising Act for its extension from Belmore to Chapel Road was passed through the NSW Parliament. A tender was accepted for construction of the line in November 1907 and it was finally declared open on 14 April 1909. Bankstown was presented by developers, such as Arthur Rickard, as a healthy residential alternative to the inner city slums. As a consequence land that had always been of marginal agricultural worth became valuable residential real estate. Workers could labour in the city, raise their

# NSW State Heritage Inventory form

families in a rural environment on quarter acre blocks, and grow vegetables in their leisure hours. It was from this time that the Bankstown Municipality's urbanisation can be dated and a population boom was first experienced. Population growth was steady and by 1910 the population of the municipality had reached 2000. North and South Terrace were created in response to railway development at this time. [J.H. Forsyth, 'Historical Notes On Bankstown Line', Vol.1, Public Transport Commission of New South Wales, 1976, p.16; SRANSW, Archives Section, 'Station & Track Data', Vol.1, 1988, p.118; Mrs Fraser, *Souvenir Of Bankstown*, 1922, n.p. ML Q991.1/F]

The focus of the Bankstown Municipality, where the town hall had been constructed, moved from the intersection of Chapel Road and Liverpool Road to the vicinity of Bankstown Station. The southern drift in the municipality's focus was recognised when the original Bankstown Public School was renamed Bankstown North in October 1913. The final capitulation came in 1918 when the old Bankstown Post Office closed and reopened near the station. [Rosen, 1996, pp.80-81.]

## 4 The Greenacre Park Estate

Coinciding with the establishment of the Bankstown line was the formation of the Greenacre Park Estate by Arthur Rickard. The estate was bounded by Liverpool Road, Chapel Road and Hillcrest Avenue and the railway line. Some 283 houses were constructed in the Bankstown Municipality in 1913 and these were mostly within walking distance of a station and the site of St Paul's. In that year alone the population increased by 700. Whilst the building boom of 1912-1914 was curbed by the Great War, the population of Bankstown continued to expand. Despite wartime losses, the second decade of the twentieth century was one of overall population growth. [Peter Spearritt, *Sydney Since The Twenties*, Hale and Iremonger, Sydney, 1978, p.27.] Gradually, services in the area developed, including the Bankstown District Friendly Societies Association which was established in 1914 and in 1919 an affiliated dispensary to assist with the provision of medical care and pharmaceuticals. [Rosen, 1996, p.87.] The establishment of St Paul's Church on the corner of Chapel Road and French Avenue was integral to this phase of Bankstown's development.

## 5 Development of the Site of St Pauls

St Pauls is located lots 26, 27 and 28 of Section A of the Greenacre Park Estate. Lot 26, the most eastern of the three lots, was purchased by Ethel Nield, wife of Roscoe Nield of Lakemba in August 1913. In February 1914, lots 27 and 28 were purchased by John



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	<p>Kent, Wilfred Law Docker and Henry Wallace Mort. Mort was described as a clerk in holy orders and it is assumed that these men were church representatives. Not long after, in June 1914 the Anglican Archbishop of Sydney licensed, St Paul's Bankstown and inducted the rector, the Rev W. Rutledge Newton to the 'newly formed parish'. In October 1914 lot 26 was also acquired by Kent, Docker and Mort. In February 1923 the property was transferred to the Church of England Property Trust Diocese of Sydney. [LPI: CT: Vol. 2412 Fol. 67; CT: Vol. 2361 Fol. 19; SMH, 20 June 1914, p.6] The establishment of St Pauls at this location at this time is a reflection of the change in focus of the Bankstown Community, arising from the location of Bankstown Railway Station and of the central role of the church on the community.</p> <p>It is commonly asserted in reference to St Paul's that it was constructed in 1912, but the preceding evidence puts this claim in doubt. The earliest construction date is likely to have been the first half of 1914, but may have been later, with the induction of the rector merely marking the beginning of the establishment of St. Paul's parish. The first contemporary reference to St Paul's in use is to a wedding in November 1916. [<i>Mudgee Guardian and North Western Representative</i>, 30 November 1916, p.11] There are also some claims that the original church building, now used as a hall was not constructed until c.1920. The precise date of construction has not been determined</p> <p><i>Church buildings</i></p> <p>An extension to the timber St Paul's constructed c.1914-1920 was dedicated on 9 October 1926 by Archdeacon Charlton. [SMH, 9 October 1926, p.9.] In 1928 a film hall in Kitchener Parade was acquired to serve as a Parish Hall. [St Pauls Anglican Church Bankstown, "Sunday News", Sunday 11 March 2012 in Bankstown Historical Society Vertical File: St Paul's Church] Tenders were called by architect N.W. McPherson in June 1938 for the new church and in October 1938 the foundation stone of a new brick church was laid. The architect was Norman Welland McPherson who had established a strong ecclesiastical architectural practice.[SMH, 21 June 1938, p.5; <i>The Bankstown Observer</i> 23 October 1963, p.11 in Bankstown Historical Society Vertical File: St Paul's Church] The church was completed in March 1939 and consisted of the chancel and one bay of the nave. The second part was commenced in 1958 and opened on Easter Sunday 1961. [St Pauls Anglican Church Bankstown, "Sunday News", Sunday 26 February 2012 and 1 April 2012 in Bankstown Historical Society Vertical File: St Paul's Church]</p> <p>In 1960 the church hall, formerly the original chapel, was extended toward Chapel Road. In 1967 the church hall kitchen redesigned and</p>
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	<p>renovated in 1969 the front facade was brick veneered to match the church. [St Pauls Anglican Church Bankstown, "Sunday News", Sunday 1 April 2012 in Bankstown Historical Society Vertical File: St Paul's Church.]</p> <p>Until at least 1943 the rector lived in accommodation rented locally, in November 1943 the Rev. Herbert Marshall was evicted after seven years of residency and took up residence in a sectioned off portion of the hall. A situation that would not have occurred if the church had a residence. This may have arisen because of accommodation shortage associated with the war and Bankstown's prominent role in the war. With materials shortages – the construction of a rectory was not likely to have been achieved in the short term. [Daily Telegraph, 29 November 1943 p.5 in Bankstown Historical Society Vertical File: St Paul's Church]</p> <p>In 1957 the exterior of the hall was painted by volunteers and on Saturday mornings an opportunity shop selling cakes and sweets was held in the hall porch to raise money for two stained glass windows for the apse of the church. [The Torch Bankstown 11 July 1957, p.15 in Bankstown Historical Society Vertical File: St Paul's Church] Other activities to aid with the completion of the church was an investment scheme, a Gilbert and Sullivan concert and performances by the St Paul's Dramatic Society. [The Torch Bankstown 15 July 1957, p.14 in Bankstown Historical Society Vertical File: St Paul's Church] In 1962 the church was seeking funds to pay off the completed church, to improve the parish hall and to complete the rectory. It was not consecrated until 1968 when the debt was paid off. [The Bankstown Anglican, April 1962, p.1 and St Pauls Anglican Church Bankstown, "Sunday News", Sunday 1 April 2012 in Bankstown Historical Society Vertical File: St Paul's Church.]</p> <p>In 1970 the Chapel Road frontage of the rectory was extended to accommodate meetings and Sunday school classes</p> <p><b>6 St Pauls' Importance to the Community</b></p> <p>St Paul's has a long tradition of contributing to the community and of community involvement in St Paul's. This includes cultural activities such as sponsoring eisteddfods, the first being held in 1928 at the parish hall in Kitchener Parade. [South Coast Times and Wollongong Argus, 11 May 1928, p.13] Sports were an important element of the 1930s, with teams competing in inter church competitions. In May 1930 the junior hockey team was defeated by the Botany Baptists 3-1. [Truth, 25 May 1930, p.6] Their soccer team played in the Protestant competition, with St Paul's juveniles defeating the Wardell Road Methodists 3-1 in June 1930. [Truth, 15 June 1930, p.5] Other groups included a Girls Club, and a Women's Guild. [The Muswellbrook Chronicle, 15 Dec 1931, p.2]</p>
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	<p>On 1 November 1932 the Returned Soldiers League in association with the state wide employment drive held a meeting at St Paul's Parish Hall in Kitchener Parade inviting professional and business men to assist in securing employment for ex-servicemen in the district. [SMH, 27 October 1932, p.13] Other events of the 1930s included a "mission" held by the Church Army campaigners in 1933. [SMH, 4 March 1933, p.7] St Pauls choir participated in St Andrews Day celebrations in November 1934. [SMH, 1 Dec 1934, p.21] In the late 1950s the Church of England Boys Society was using the hall to hold a talent quest on Saturday evenings. [The Torch Bankstown 11 July 1957, p.15 in Bankstown Historical Society Vertical File: St Paul's Church]</p> <p>In 1983 St Paul's successfully applied to Bankstown Council for permission to occupy some of the church buildings for a choir school to cater for some 12 to 15 primary school aged boys gifted in singing and with musical ability. The school was to cater for the usual range of academic subjects but was to have a special emphasis on singing and music. It was to operate independently from the other church activities on the site, but would use the church, the hall and meeting room attached to the rectory. [BCC: P.32/199/459/26] The St Paul's Choir School which operated on the site until 1991 was the foundation school of what became Georges River Grammar School. [Georges River Grammar at <a href="http://www.grg.nsw.edu.au">www.grg.nsw.edu.au</a>]</p> <p>It is impossible to document in such a brief assessment the extensive role of St Paul's in the Bankstown community and the contribution it has made to the lives of Bankstownians. Equally the contribution of members of the community St Pauls is also prolific and a great deal of evidence of this can be found recorded in the fabric of the structures and grounds. For example, in the garden beds there are plaques where the ashes of parishioners have been placed including the prominent Englisch family. The windows in the church were donated by parishioners, often to memorialise loved ones, such as that donated by a Mr Olaf depicting Saint Olaf. Furniture was also donated by parishioners, including bookshelves, noticeboards and the dedication plaque for the Tower, gallery, porch and narthex from 1961. Doors, pews and windows were all donated by community members. The details of these have been documented by the Bankstown Historical Society. There are 25 windows and some 72 other items in the church that document the community's involvement. For example, one brass plaque, reads "The Holy Table, Communion Rail and Sanctuary Chair, Lectern, are the work and labour of love of Herbert H. Dearia". Attached to the sanctuary doorway is a plaque which states: "This doorway is erected to the Glory of God and in memory of Frederick Charles Arnott. Nov. 4<sup>th</sup> 1956." Under the stained glass window depicting the Good Samaritan is a plaque reading: " To the Glory of God and in loving</p>
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# *NSW State Heritage Inventory form*

memory of Raymond Edward Fitzpatrick, 1909-1967". Fitzpatrick was a very well known local identity, with strong connections to council. The brass plaque for the sanctuary chair reads: "to the Glory of God and in cherished memory of Allan Richard Maunsell AB RAN who succumbed to injuries received in enemy action on HMAS Australia on 21<sup>st</sup> October 1944. A scholar, Sunday School Teacher and communicant of this Church. This chair is the gift of his comrades and fellow members of the church. L. Bramble AIF, J. Cross RAN, N. Marshall RAN. [Bankstown Historical Society Vertical File: St Paul's Church.]

In recent years the Parish has been approached by various developers with a view to redeveloping the site, but the position of the church on the lot has inevitably meant that redevelopment would require demolition of the Church. Increasingly with a diminished congregation the Church has been unable to meet its running costs and after another inquiry from a developer the Parish at their Annual Meeting in March 2015 decided to again investigate redevelopment of the site. That investigation is on going. [Personal Communication Rev. Garry Bennetts]

Distressed by the prospect a number of parishioners launched an on-line petition objecting redevelopment and approached Bankstown Council to impose an Interim Conservation Order over the site has been launched by the community to defeat the proposal and save St Pauls from redevelopment.

## **7 Norman Welland McPherson, FRAIA ARIBA**

Norman McPherson was an architect who graduated from Sydney University and practised architecture from 1923 until the mid 1970s. Born at Hornsby in 1900, he attended Sydney Technical College in 1916 where he initially studied Engineering Trades but swapped to architecture, obtaining a Bachelor of Architecture in May 1923. An artist and an organist as well as an architect, he was employed by the architectural firm of Budden and Greenwell in 1924. He designed many churches in Sydney and New South Wales including the Chatswood Congregational Church and St Smithin's Anglican Church at Pymble and the New Methodist Church at Mayfield which were entered in the 1938 Architectural Exhibition of the Royal Australian Institute of Architects. McPherson also wrote occasionally on architecture for the Sydney Morning Herald on "The Small Church" in 1930 arguing that they did not need to be slavishly Gothic in style and "The Architect and Present Day Conditions " in 1932. [SMH, 20 September 1930, p.7 and SMH, 1 September 1932, p.80 other churches that he built include the New Methodist Church at Waitara dedicated in 1932. [SMH 13 October 1931, p.5] He designed the Rawson Institute for Seaman [SMH 24 February 1932, p.14]

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Although by 1930 McPherson was building small brick cottages and by 1933 blocks of flats (Balmoral Beach) and blocks of shops (Lakemba) the majority of his work was ecclesiastical and during the 1930s he designed Methodist churches at Waitara (1931), Balgowlah (1932), Bankstown, Manly (1932) Narooma (1935), Sutherland (1936), Mayfield (1937), and Wellington (1937-38), Eastwood (1941). The first design seems to have been Waitara, and this design was published in the *Sydney Morning Herald* in March 1931. In addition he designed the Baptistery for St Johns Church of England at Ashfield in 1932 and a congregational church at Chatswood (1933). By June 1952, in the post war period he had obtained 10 commissions for churches and also designed the National Methodist Church in Canberra. In the 1960s with his partner D.A.W. Harrison he began to design hospital buildings, but continued to build churches into the 1960s. [AIA NSW Architects Bibliographical Information]

Four other churches designed by McPherson are heritage listed. They are:

The Mosman Uniting Church and Hall

The Uniting Church Group comprising Church, Parsonage and Fence

The All Saints Cathedral Group at Bathurst

The Bonville Memorial Hall is also heritage listed

## 8 Conclusion

The suite of buildings that comprise St Paul's Bankstown are related to the NSW historic themes of Towns, Suburbs and Villages, and the themes of Education, Welfare, Religion, Social Institutions, Creative Endeavour and Birth and Death.

This brief and incomplete history of St Paul's reveals that St Paul's is a product of the community, a reflection of the community and an institution that was both a supporter of the community that was in turn supported by the community. The evidence of that long history is retained in the physical fabric of the building and further documentary research will undoubtedly add to the story of the place and its people.



# NSW State Heritage Inventory form

THEMES	
<i>National historical theme</i>	Building Settlements Towns and Cities; Developing Australia's Cultural life, Marking the Phases of Life
<i>State historical theme</i>	Towns, Suburbs and Villages; Creative Endeavour; Religion; Birth and Death.

APPLICATION OF CRITERIA	
<b>Historical significance</b> SHR criteria (a)	St Paul's Bankstown is capable of demonstrating the historic theme of towns, suburbs and villages reflecting the focal shift in the early twentieth century of Bankstown from the Liverpool and Chapel Roads intersection to the vicinity of Bankstown railway station. The site retains the original timber chapel and the more substantial brick church constructed in 1938 and 'finished off' in 1961. It is also able to demonstrate the theme of creative endeavour in its architecture and its fittings, many of which have local associations. The fabric and location of the buildings which make up St Pauls are evidence of the historic development of the area and its social history. The construction of the church in phases is also reflective of the socio-economic history of Bankstown.
<b>Historical association significance</b> SHR criteria (b)	St Paul's has historical associative significance due to its association with local identities, such as the Engisch and Fitzpatrick families and many others memorialised in the plaques, windows and fittings of the church. It is also associated with noted ecclesiastical architect, Norman Welland McPherson, four other churches designed by McPherson are listed heritage items.
<b>Aesthetic significance</b> SHR criteria (c)	St Paul's has aesthetic significance as it demonstrates the work of architect Norman Welland McPherson, who was responsive to trends in ecclesiastical architecture in the inter-war and post war eras. The site comprises the church and rectory of McPherson's planned development (ultimately incomplete) with its unusual, pre-Reformation, almost monastic enclosed grounds. The church fabric is noteworthy for its quality brickwork and timber joinery and fittings, and the tower provides landmark value to the town precinct.
<b>Social significance</b> SHR criteria (d)	The Church is socially significant due to the attachment of current parishioners, as demonstrated by their approach to Council, and their posting of an on-line petition in response to a perceived threat to the Church. It is also likely to be significant to those people whose family members are memorialised there or



# *NSW State Heritage Inventory form*

	have had their contribution to St Paul's acknowledged in the many plaques on its walls
<b>Technical/Research significance</b> SHR criteria (e)	The connection of the rectory with the church may have technical significance.
<b>Rarity</b> SHR criteria (f)	The linking of the rectory to the Church is an unusual feature. The survival of the sequence of buildings which physically represent the history of St Paul's is also rare in a metropolitan setting.
<b>Representativeness</b> SHR criteria (g)	St Paul's is representative of parish churches and communities that developed across greater Sydney in the 20 <sup>th</sup> century.
<b>Integrity</b>	St Paul's has a very high and unusual degree of integrity.



# NSW State Heritage Inventory form

HERITAGE LISTINGS	
Heritage listing/s	None

INFORMATION SOURCES				
Include conservation and/or management plans and other heritage studies.				
Type	Author/Client	Title	Year	Repository
No heritage studies cited, but references are as cited in text.				

RECOMMENDATIONS	
Recommendations	<ul style="list-style-type: none"> <li><input type="checkbox"/> An Interim Heritage Order should be immediately placed on Saint Paul's by Council to ensure its protection while the LEP nomination is under consideration.</li> <li><input type="checkbox"/> List No. 459 Chapel Road Bankstown on the Bankstown LEP as an item of local heritage significance as a matter of urgency.</li> <li><input type="checkbox"/> The proposed heritage listing should minimally include the Church, The Rectory and the Church Hall. Intrusive elements, such as the amenities block at the rear, should be identified in a comprehensive survey and removed.</li> <li><input type="checkbox"/> The physical impact of concreting to the southern church wall church should be assessed.</li> <li><input type="checkbox"/> Softer landscaping options on the southern and eastern side reflective of the north-western area should be considered as a more appropriate setting.</li> <li><input type="checkbox"/> If a DA for the site is presented, Council should require the preparation of a Conservation Management Plan for the entire site.</li> </ul>





# NSW State Heritage Inventory form

	<ul style="list-style-type: none"> <li><input type="checkbox"/> If a DA for the site be presented Council should require the development of an Interpretation Plan and Strategy.</li> <li><input type="checkbox"/> The lot should not be amalgamated with adjoining lots.</li> <li><input type="checkbox"/> Development in the area should not impinge on the curtilage of No.459 through dwarfing or overshadowing.</li> <li><input type="checkbox"/> Neighboring development should not be unsympathetic to the form, bulk and scale of the site.</li> <li><input type="checkbox"/> Fire and disability requirements should consider the impact on the heritage values of the site.</li> <li><input type="checkbox"/> All conservation, adaptive reuse and future development should be undertaken in accordance with the Australia ICOMOS Charter for Places of Cultural Significance (The Burra Charter).</li> </ul>
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SOURCE OF THIS INFORMATION			
Name of study or report	St Pauls Bankstown	Year of study or report	2015
Item number in study or report			
Author of study or report	Dr Sue Rosen and Mr Nick Jackson		
Inspected by	Sue Rosen and Nick Jackson		
NSW Heritage Manual guidelines used?		NSW Heritage Manual guidelines used?	Yes <input type="checkbox"/> <input checked="" type="checkbox"/>
This form completed by	Sue Rosen and Nick Jackson	Date	28/05/2015

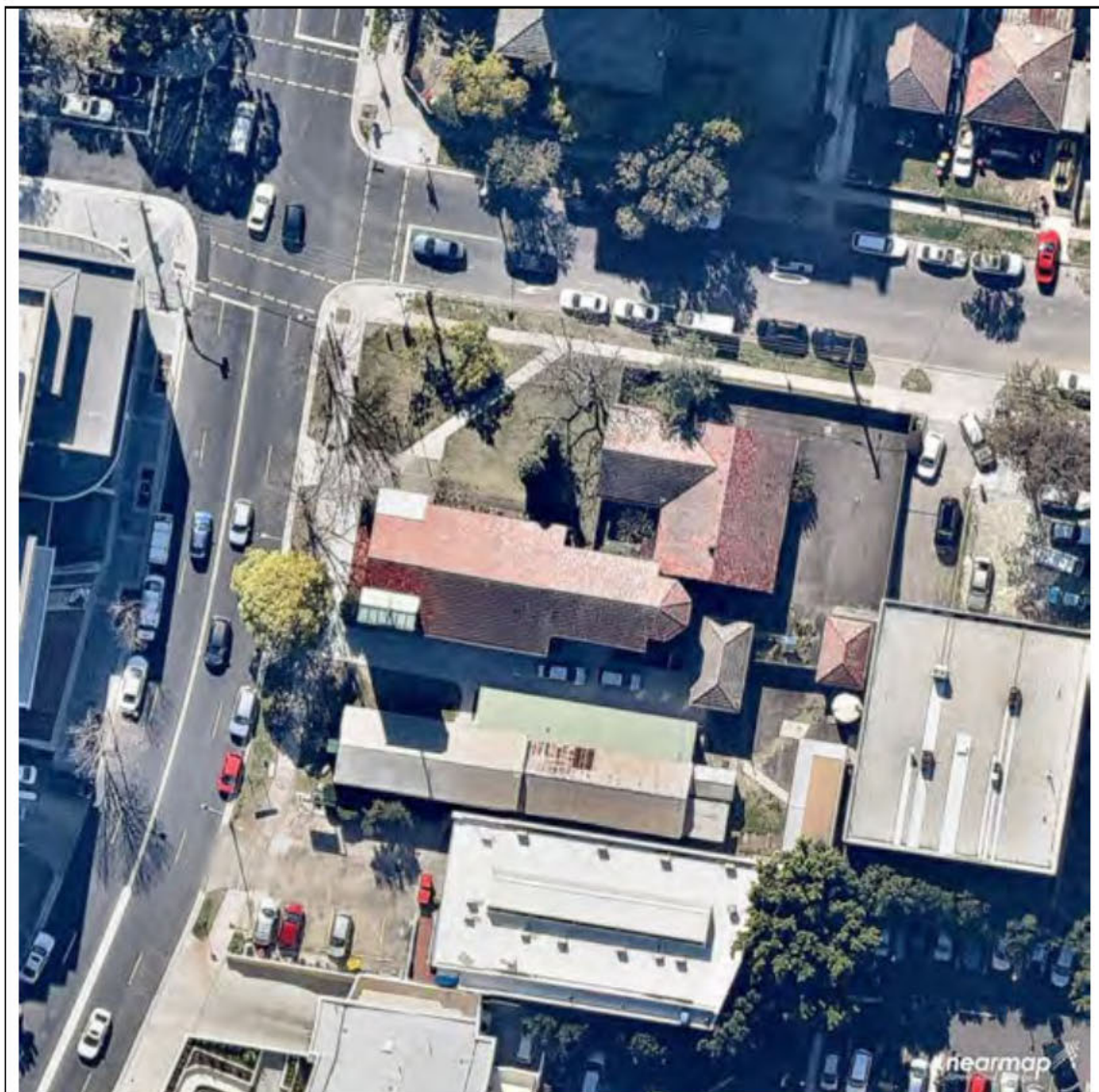


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## IMAGES - 1 per page

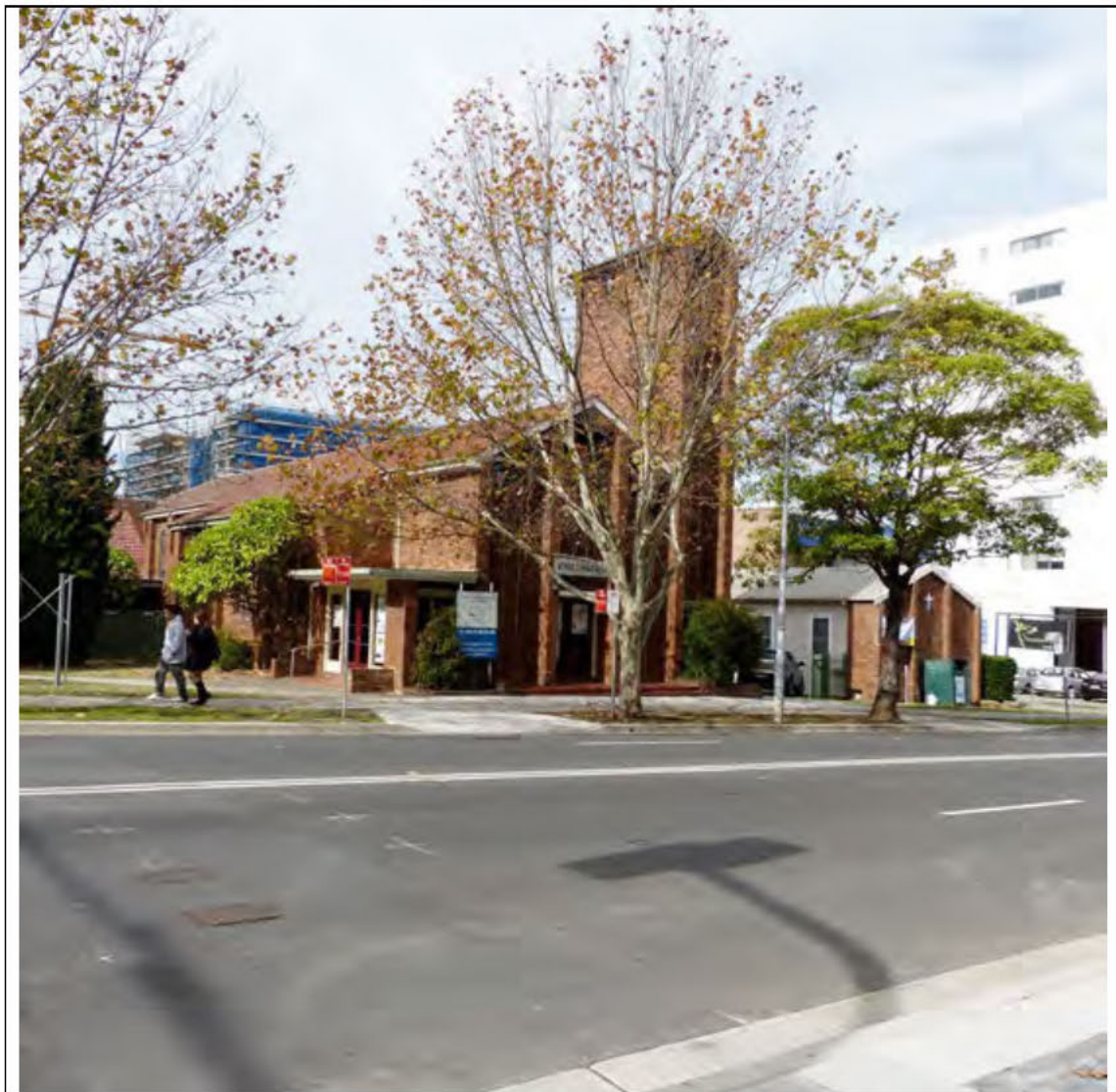
Please supply images of each elevation, the interior and the setting.

Image caption	Aerial view of the St Paul's Complex, showing connected rectory and landscaped area to north and north-west and halls bordering the southern portion of the site. Amenities and utility structures are to the rear and west of the principal buildings.				
Image year	2015	Image by	Nearmap	Image copyright holder	Nearmap



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Image caption	St Pauls Chapel Road frontage to Chapel Road, the original church, now the hall is on the extreme right and the rectory on the left.				
Image year	2015	Image by	Sue Rosen	Image copyright holder	Bankstown City Council





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Image caption	South elevation of St Paul's Church, showing concreting abutting the church.				
Image year	2015	Image by	Sue Rosen	Image copyright holder	Bankstown City Council



# *NSW State Heritage Inventory form*

Image caption	East end of St Paul's with canted apse and rectory at right				
Image year	2015	Image By	Nick Jackson	Image copyright holder	Bankstown City Council







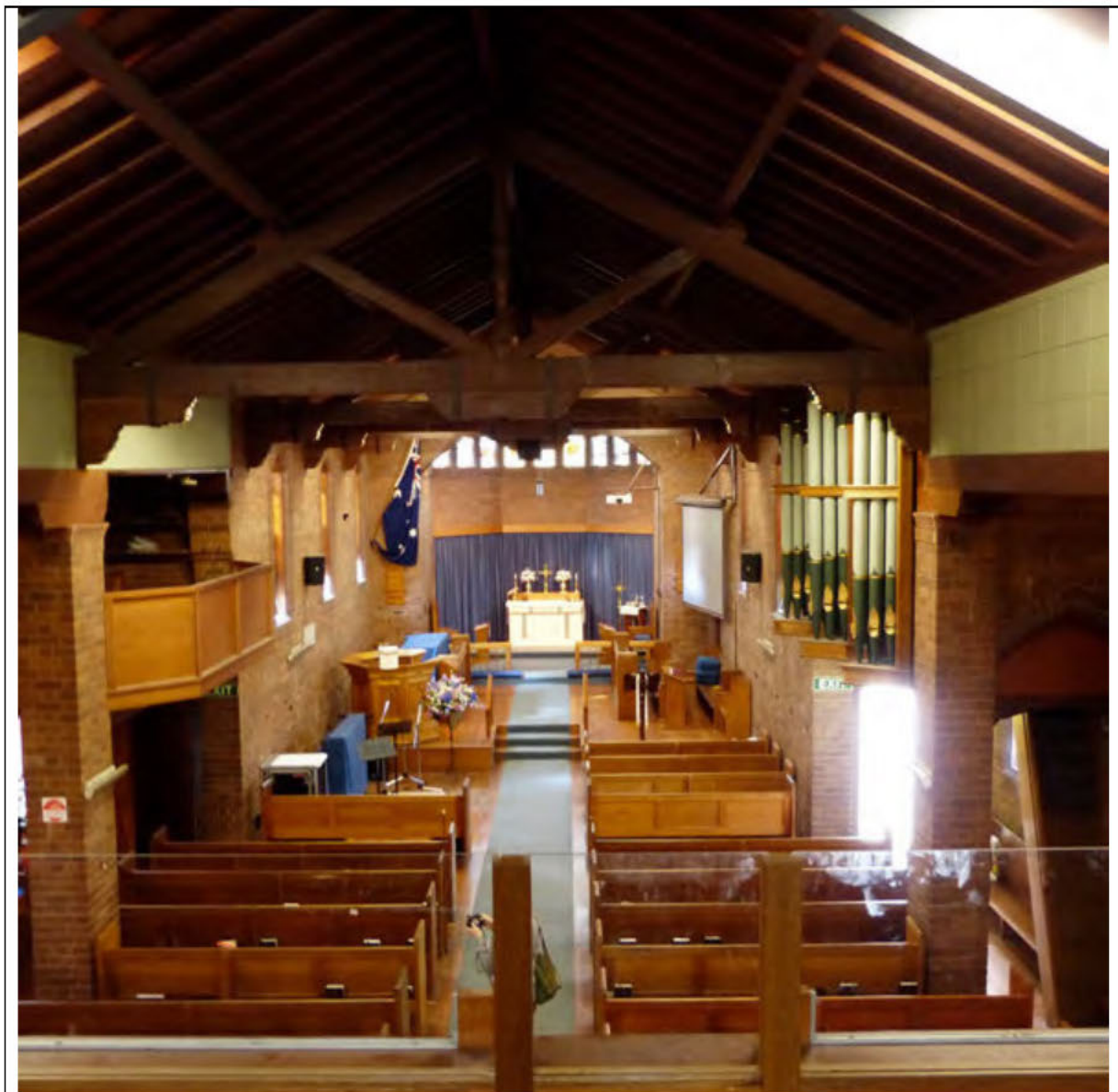
# *NSW State Heritage Inventory form*

Image caption	Organ and Organ Loft				
Image year	2015	Image by	Nick Jackson	Image copyright holder	Bankstown City Council



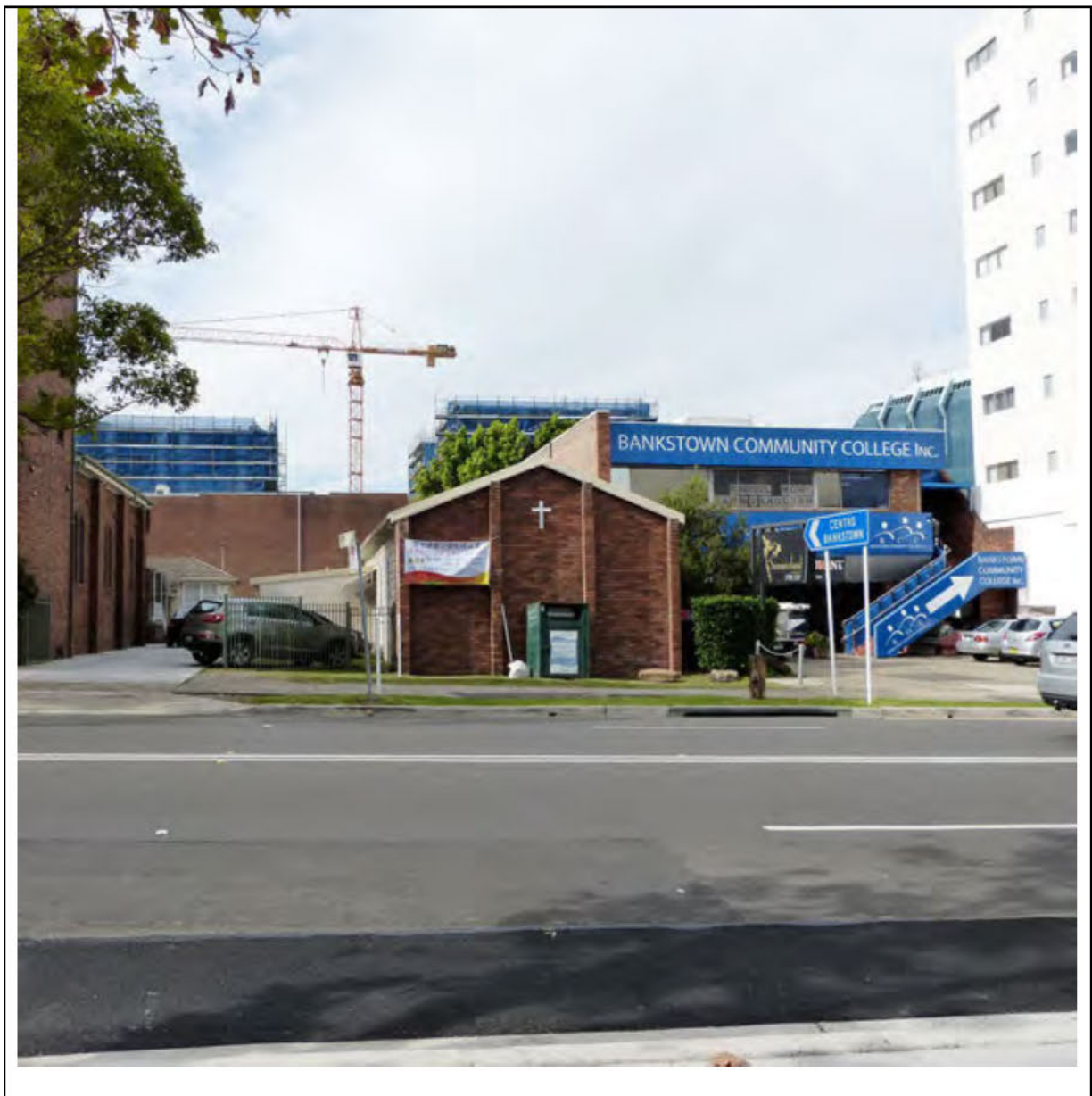
# *NSW State Heritage Inventory form*

Image caption	Interior view from choir stalls				
Image year	2015	Image by	Sue Rosen	Image copyright holder	Bankstown City Council



# *NSW State Heritage Inventory form*

Image caption	Chapel Road frontage of Church Hall				
Image year	2015	Image by	Sue Rosen	Image copyright holder	Bankstown City Council





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Image caption	Northern elevation of Church Hall, encompassing the original timber church showing extensions.				
Image year	2015	Image by	Sue Rosen	Image copyright holder	Bankstown City Council







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Image caption	Rectory				
Image year	2015	Image by	Nick Jackson	Image copyright holder	Bankstown City Council



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Image caption	Part of an undated Parish Map of Bankstown showing Richard Morgan's grant, between that of Frederick Meredith and Matthew heron. Chapel Road dissects it and some subdivision had commenced. [Six Maps]				
Image year	n.d	Image by	LPI	Image copyright holder	LPI

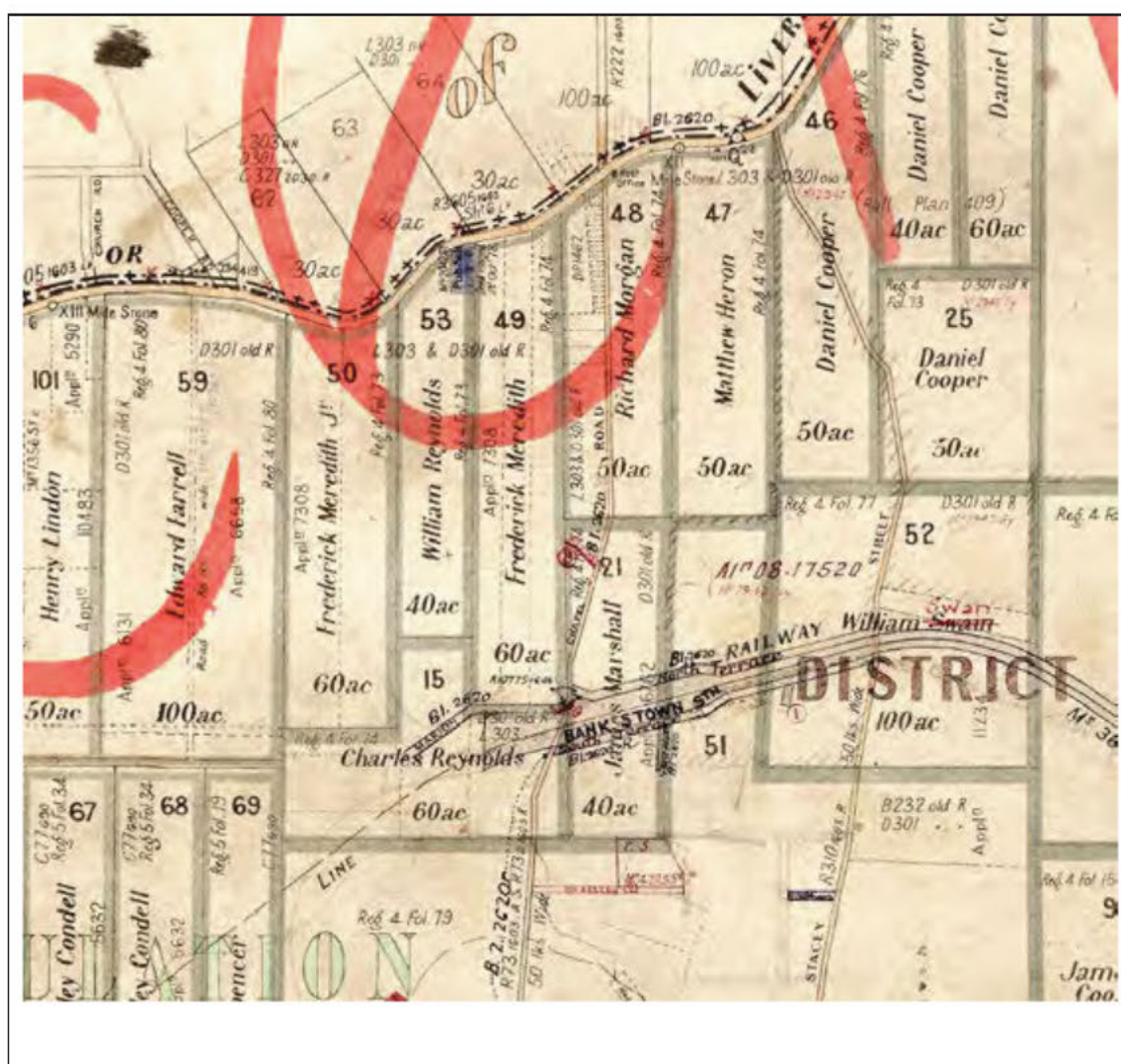
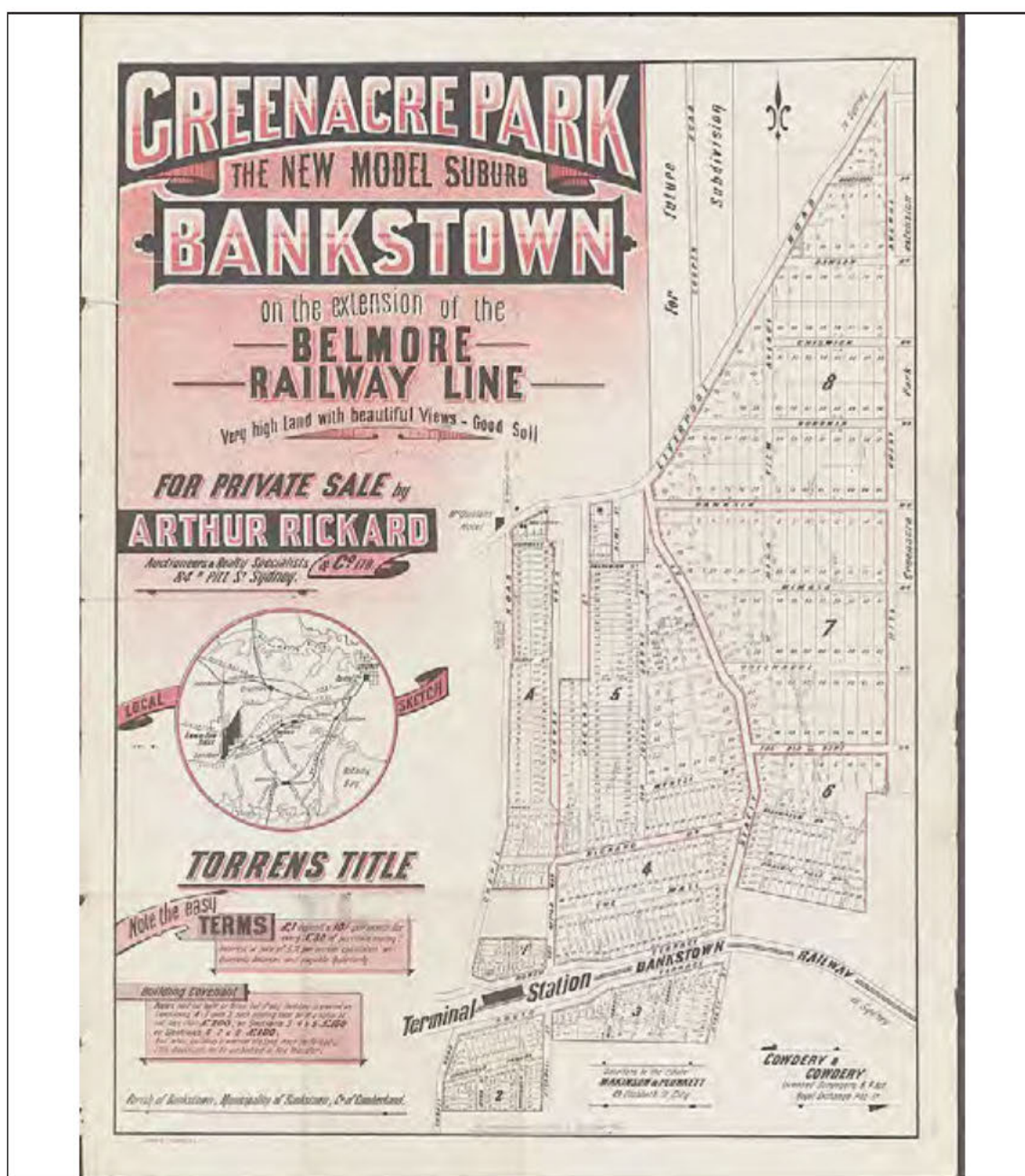




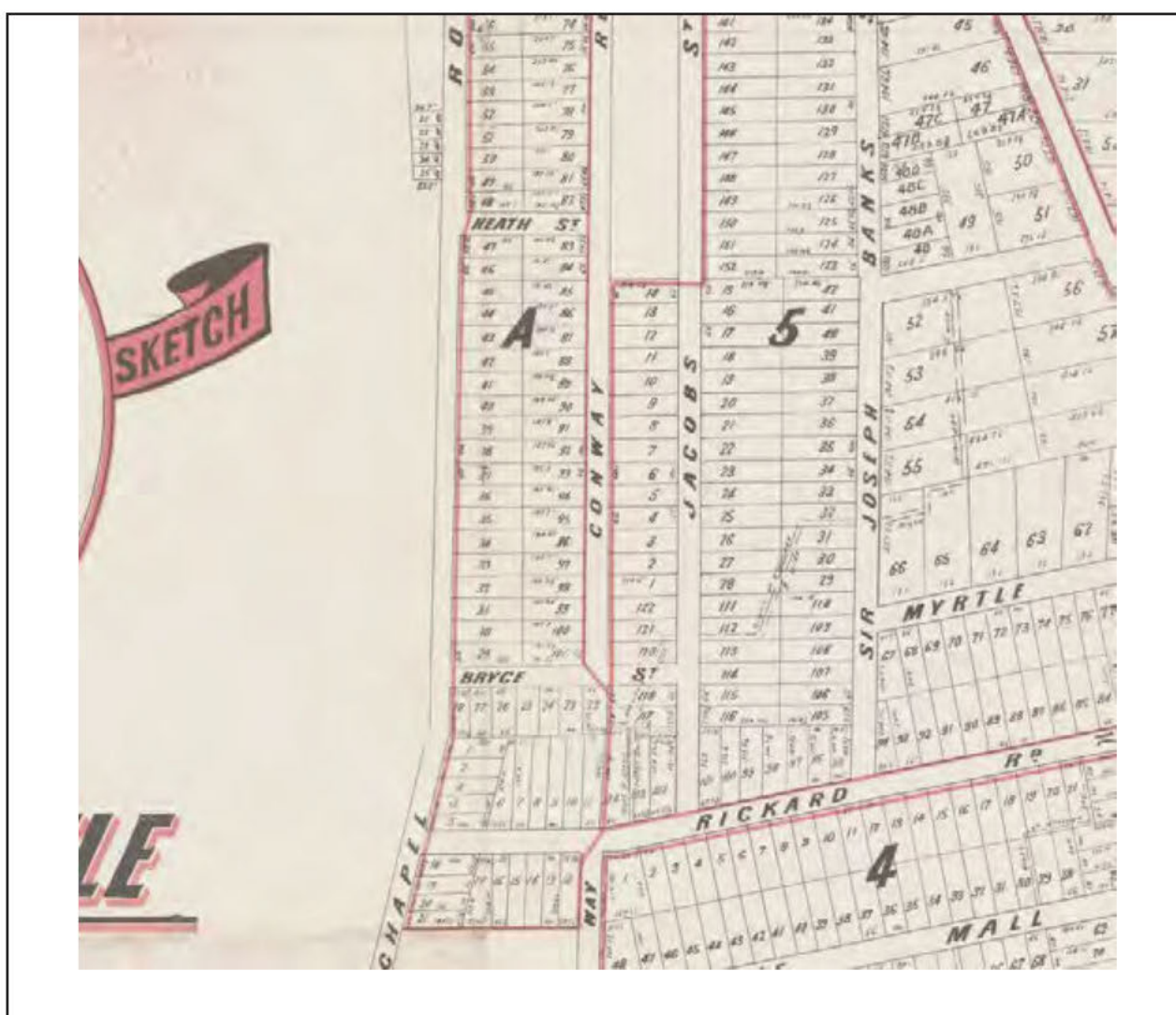


Image caption	Greenacre Park, the new model suburb Bankstown [cartographic material] : on the extension of the Belmore railway line for private sale 1910. MAP Folder 16, LFSP 254.				
Image year	1910	Image by	National Library	Image copyright holder	None



# NSW State Heritage Inventory form

Image caption	Extract from Greenacre Park, the new model suburb Bankstown [cartographic material] : on the extension of the Belmore railway line for private sale 1910. MAP Folder 16, LFSP 254. Lots 26, 27 and 28 are shown addressing Bryce Street, now French Avenue.				
Image year	1910	Image by	National Library	Image copyright holder	None





# *NSW State Heritage Inventory form*

Image caption	The original St Pauls [Bankstown Historical Society, 767]				
Image year	c.1930s	Image by	unknown	Image copyright holder	none



# *NSW State Heritage Inventory form*

Image caption	This 1943 view shows the first church and the brick church.				
Image year	1943	Image by	Six Maps	Image copyright holder	Six Maps



# *NSW State Heritage Inventory form*

Image caption	Front view of the original St Pauls [Bankstown Historical Society, 784]				
Image year	c.1930s	Image by	unknown	Image copyright holder	None





# *NSW State Heritage Inventory form*

Image caption	The new Church and the old. The old church had been extended, c.1926-1928, to the rear and to the side to accommodate the choir stalls and vestry. [Bankstown Historical Society, 785]				
Image year	c.1938	Image by	unknown	Image copyright holder	None





# *NSW State Heritage Inventory form*

Image caption	The interior of St Pauls possibly in 1930s and prior to installation of stained glass windows in late 1960s. [Bankstown Historical Society, Image 767]				
Image year	c.1940	Image by	unknown	Image copyright holder	None



Image caption	An appeal to the community for funds to complete the church [Bankstown Historical Society, Vertical File: St Paul's Bankstown]				
Image year	1950s	Image by	unknown	Image copyright holder	None



# *NSW State Heritage Inventory form*

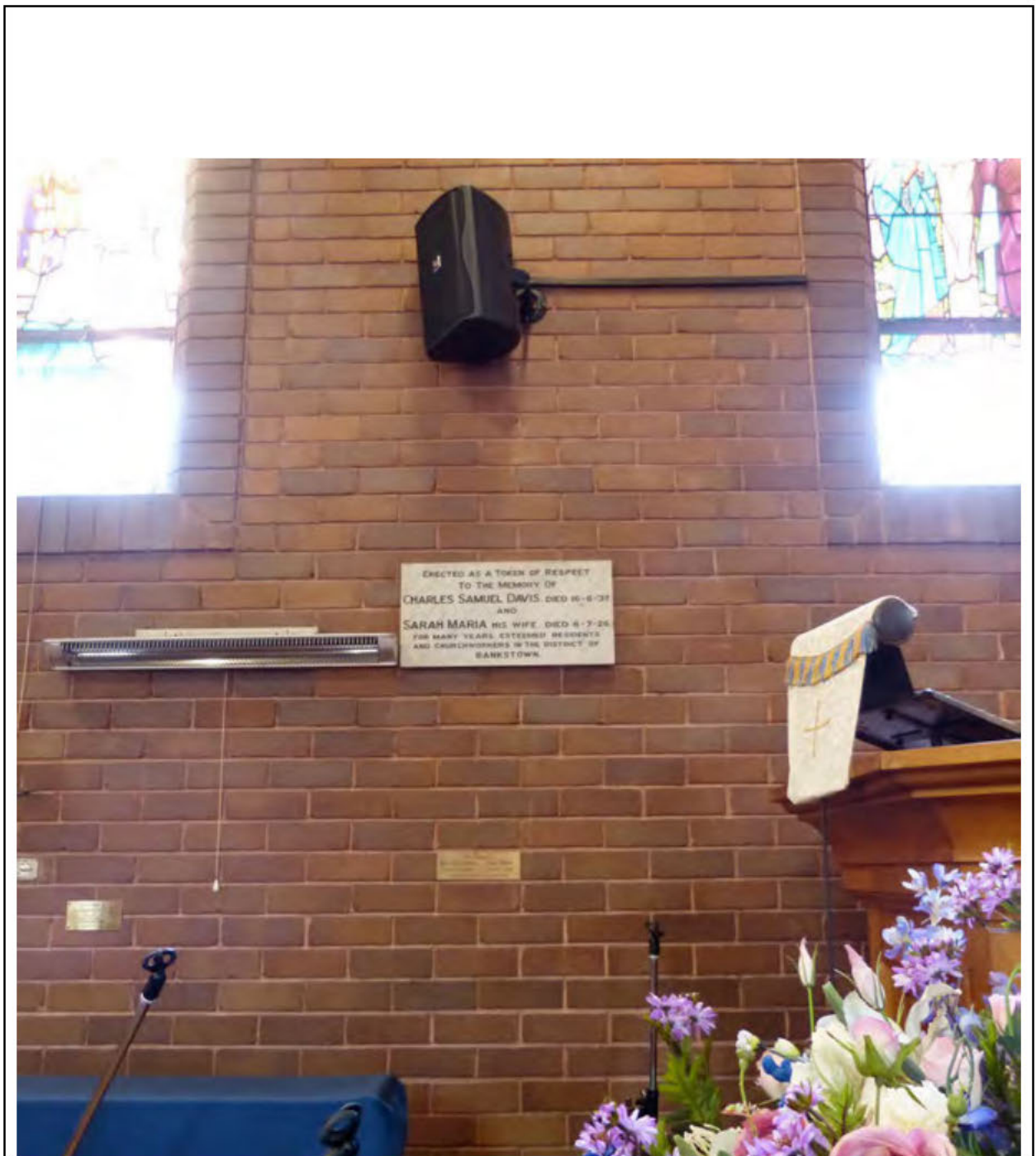
Image caption	Women fundraising in the Church Hall [Bankstown Historical Society]				
Image year	1950s	Image by	unknown	Image copyright holder	None





# *NSW State Heritage Inventory form*

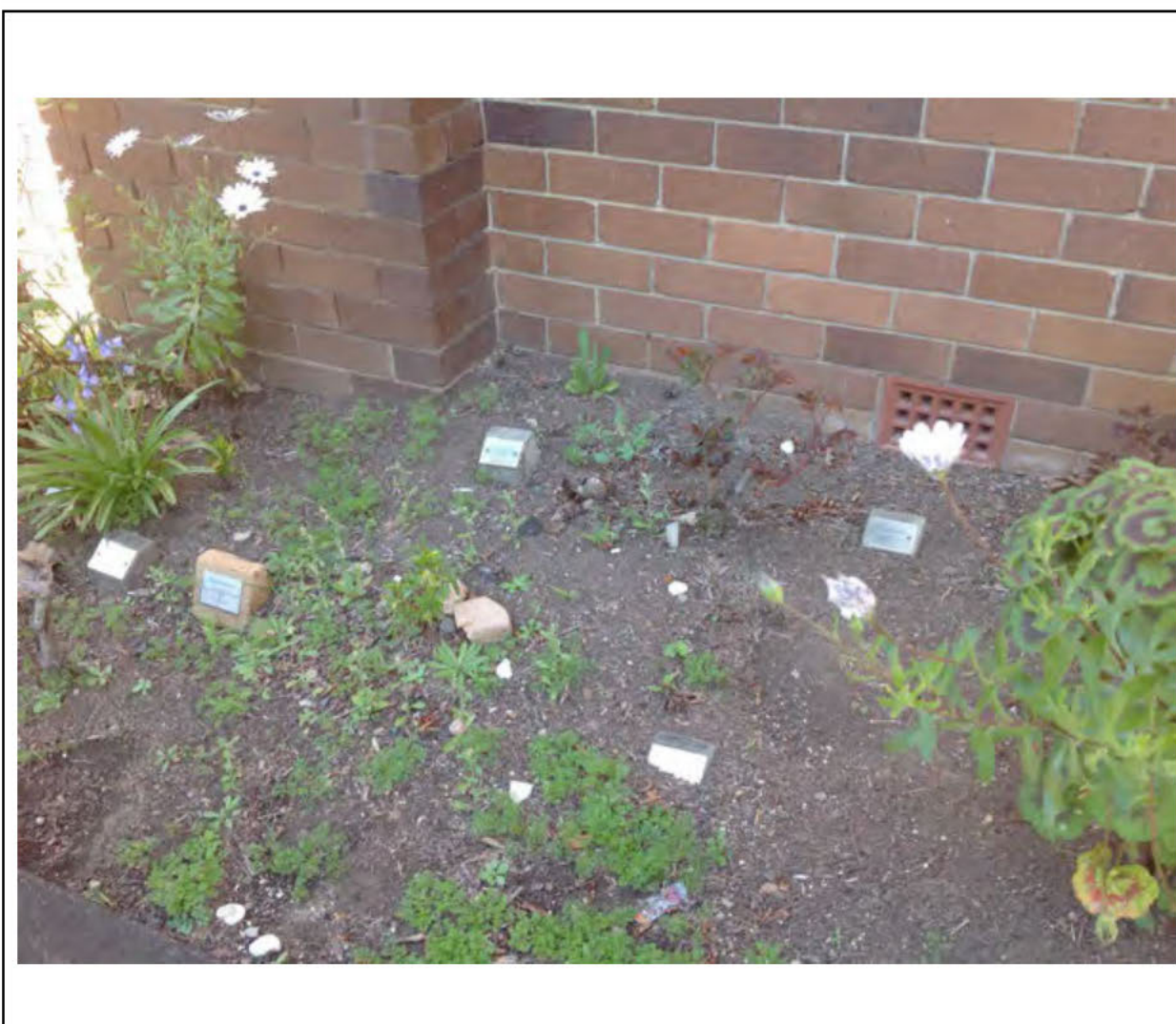
Image caption	One of the many plaques testifying to the contribution of locals to St Pauls.				
Image year	2015	Image by	Sue Rosen	Image copyright holder	Bankstown City Council





# *NSW State Heritage Inventory form*

Image caption	Memorial plaques in garden on northern side of church, well known Bankstown families are represented here.				
Image year	2015	Image by	Sue Rosen	Image copyright holder	Bankstown City Council



# *NSW State Heritage Inventory form*

Image caption	Another view of memorial plaques in garden on northern side of church				
Image year	2015	Image by	Sue Rosen	Image copyright holder	Bankstown City Council





18 February 2016

The General Manager  
Bankstown Council  
PO Box 8  
Bankstown NSW 1885

Attn: Amita Maharjan, Strategic Planner



## **OBJECTION TO HERITAGE LISTING ST PAUL'S ANGLICAN CHURCH GROUP 459 CHAPEL STREET, BANKSTOWN**

On behalf of St Paul's Anglican Church, Bankstown, we have pleasure in submitting this formal Objection to the potential LEP Heritage Listing of the entire site of the St Paul's Church group, on the corner of Chapel Road and French Avenue, Bankstown.

### **Summary of the Objection**

In summary the Church vigorously opposes the potential heritage listing of the property on the following grounds:

While the Heritage Inventory sheet for the property has been prepared by two respected historians, they have not reviewed and considered the nature of the current building fabric, its condition and integrity, or the evolution of the various buildings on the site. Accordingly, many of their research conclusions are incorrect. They have omitted a range of analytical information that must lead to different conclusions and recommendations than contained in the Inventory sheet.

The existing heritage significance analysis has NOT been made against the thresholds for listing for each of the standard Assessment Criteria published by the NSW Heritage Council. Their analysis does NOT provide any analysis of the place that makes a case for listing. Accordingly, their recommendation for listing is flawed.

The Council has given Development Consent (DA 907/2009) for the demolition of the entirety of the existing hall on the southern side of the site. This hall contains the remnants of the first church-related building on the site (c1914). A Construction Certificate (CC-699/2009/1) in relation to this DA was issued by Bankstown City Council on 23 October 2010. The permitted demolition includes the free standing Vestry and small toilet block.

Church related activities on the subject site date back to the earliest decades of the 20<sup>th</sup> century and have resulted in the periodic evolution of the site in terms of the buildings and building fabric in which those activities have taken place. This is particularly clear in the two distinct architectural styles contained in the main Church building and in the alterations and additions made to the original Church Hall. Heritage listing is highly likely to "freeze" this evolutionary development, severely restricting the capacity of the Church to continue evolving its services to the community.

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## Background

Council wrote to the Church on 25 November 2015 confirming that, on the initiative of Council, the NSW Government Gazette published a notice on 6 November 2015 of an Interim Heritage Order (IHO) over the subject property. The Interim Heritage Order will apply for a maximum of six months.

During the life of the IHO no major works, including demolition can be done on the property without the prior consent of Council.

During the life of the IHO Council must make a decision whether to list the Church as a local heritage item. It is proposed to report the matter to the Council meeting in March 2016.

The Church has an opportunity to review the heritage inventory that informed the making of the IHO and to make a written submission outlining its position as to whether Council should list the church as a local heritage item. The submission must be lodged by 19 February 2016, in order for it to be included as part of the report to Council. This Objection responds to that opportunity.

## Analysis of the information contained in the Heritage Inventory form

### Physical Description

There are a number of areas in this section of the Heritage Inventory which understate or incorrectly state the facts and consequently convey the wrong impression of the reality on the subject site.

1. The statement that the Church building was built in 1938 with some “modernisation” in 1961 does not recognise that only about one half of the 1938 master plan for the church and its surrounding complex were implemented. In 1961, major additions were made that extended the nave and included a contemporary façade and bell tower element.
2. The architectural style of the Church building cannot be simplistically reduced to “Inter-war Romanesque”. This ignores the radically different architectural style of the 1961 façade, entry and bell tower. At best the original section has a very restrained Inter-war Gothic imagery.
3. The original architectural master plan by McPherson for the site was a comprehensive and very formal arrangement of buildings that reinforced and gave real strength to the architectural presence of the Church as the centrepiece of the complex. This scheme was not realised, with only the rear portion of the Church built. See over for the extent of the works that were completed in 1939.



*1930s Master Plan for St Paul's Church Bankstown. largely unrealised, hanging in Hall*





*c1939 photo showing the partially completed Church nave and adjoining Church Hall, originally used as the Church, which had been extended in 1926-28 to the rear and side.*

*Source: Heritage Inventory*

4. There is no documentary evidence provided in the Heritage Inventory to support the implied conclusion that the 1961 façade and bell tower were designed by the original architect, NW McPherson.
5. The interiors of the completed Church are described as having “muscular” king post trusses. These only occur over the 1930s section of the nave and chancel. The roof structure over the 1961 extension comprises steel portal frames.
6. The organ dates from the 1960s. The organ pipes on the southern wall are purely decorative and non functional. The pews date from the 1960s. Some of the ecclesiastical furniture carries a gothic imagery and may date from the 1930s.
7. The Rectory cottage is a post WWII building, with no identified architect. It was erected in two stages, has no architectural distinction and awkwardly butts into the rear of the Church chancel in a manner that no architect would condone. It simply cannot be as claimed as “a feature of McPherson’s proposed layout for the Church.”



*Awkward junction between the Rectory roof and the Church chancel*

8. The description of the post-war Rectory as “Inter-War Old English” is entirely fanciful. It tries to give the building an architectural quality that is entirely lacking. The siting of the Rectory partially equates with the original master plan but does not fulfil its architectural quality or planning intent.



*The Rectory building post dates the original portion of the Church by at least a decade.*

9. The remnant Church Hall is generally described accurately in the Heritage Inventory. However the impact of the changes that are apparent when compared with the 1930s photo above, are understated.



*The remnant Church Hall is completely devoid of its original Federation character and has very little of its architectural integrity or early building fabric. Compare with the 1939 photo.*

The Description section makes no reference to the fact that Council granted consent in 2010 for the demolition of the Church Hall, its rear addition, the free standing current Rectory and toilet block. A Construction Certificate was issued by Council in 2011 for this demolition work. Accordingly, the demolition consent remains valid and can be activated at any time, if the Church chose to do so.

Despite its ability to demolish the Hall and outbuildings, the Church has no intention of doing so in the immediate future. These buildings provide useful spaces for the provision of the services that the Church offers to the Bankstown community. Until a realistic opportunity emerges for the provision of new facilities on the overall site, these buildings are likely to remain in service.

## Historical Notes

### Church Buildings

The section on the development of the Church building sets out the design and construction of the original section of the Church, and correctly ascribes it to the architect Norman Welland McPherson. It then states that the “second part was commenced in 1958 and opened on Easter Sunday 1961.”

This statement is very misleading as it implies the second stage of the Church building was simply the completion of the original design. This is not the case, as the architectural style was radically different and contemporary when compared with the restrained Inter-war Gothic style of the original section. It also implies that McPherson was the architect for the completion of the Church, but provides no documentary evidence to support this assumption.

### Importance of the Church to the Community

Much of the information contained in this section of the Heritage Inventory with reference to both the involvement of members of the Parish and of the events that have been held, are typical of most suburban church communities.

### Norman Welland McPherson

The information contained in the Heritage Inventory has been largely drawn from the AIA NSW Architects Bibliographical Information. This lists a number of churches designed and built by McPherson around NSW. The list establishes him as a significant practitioner in this field in the inter-war years. However the reference to him continuing to build churches into the 1960s does not provide sufficient evidence to link him with the second stage of the Church at Bankstown or other buildings on the site.

A review of some of the churches referred to in the AIA notes indicates that McPherson was responsible for a number of completed churches of far greater quality than the original section of the aborted St Pauls design.

## Conclusion

The concluding statement on pp 11 of the Inventory provides no information that would satisfy the required threshold criteria. For a place to be heritage listed it must demonstrate “special” or “important” attributes. The historical themes that are claimed for this site and collection of buildings are so general as to provide nothing more than a general background for a rigorous and detailed analysis against the standard NSW Heritage Assessment Criteria published by the NSW Heritage Council.

## Analysis against NSW Heritage Council Heritage Assessment Criteria

The analysis contained in the Heritage Inventory form uses terminology that does not take account of the actual Heritage Assessment Criteria published by the NSW Heritage Criteria, or the related thresholds for inclusion or exclusion. The full texts of each criterion and the Guidelines for Inclusion or Exclusion are set out below, followed by a commentary on the conclusions within the Heritage Inventory and a renewed conclusion as to whether the St Paul's Anglican Church Group qualifies for inclusion in the Bankstown LEP Heritage Schedule.

### Historical Significance Assessment Criteria

**Criterion (a) – An item is important in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area)**

*Guidelines for Inclusion: When the item shows evidence of a significant human activity or is associated with a significant activity or historical phase. When it maintains or shows the continuity of a historical process or activity.*

*Guidelines for Exclusion: When the item has incidental or unsubstantiated connections with historically important activities or processes. When it provides evidence of activities or processes that are of dubious historical importance or has been so altered that it can no longer provide evidence of a particular association*

The Heritage Inventory concludes that the Church group is “capable” of demonstrating a number of general historic themes and “able to demonstrate the theme of creative endeavour in its architecture and fittings”. It goes on to conclude that the fabric and location of the buildings which make up St Paul's are “evidence” of the historic development of the area and its social history. The construction of the Church in phases “is also reflective of the socio-economic history of Bankstown.” These conclusions are so general that they could be applied to any building or group of buildings in NSW.

There is no information or conclusion within the Heritage Inventory that refers in any way to St Paul's Church Group as being “important” in the course or pattern of Bankstown's cultural history, above or equal to any other religious or community group.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

### Historical Association Significance Criteria

**Criterion (b) - An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history (or the cultural or natural history of the local area)**

*Guidelines for Inclusion: When an item shows evidence of a significant human occupation or is associated with a significant event, person or group of persons.*

*Guidelines for Exclusion: When an item has incidental or unsubstantiated connections with historically important people or events. When it provides evidence of people or events that are of dubious historical importance or has been so altered that it can no longer provide evidence of a particular association*

The Heritage Inventory concludes that the complex has this significance due to its association “with a number of its parishioners who were local identities, and with the architect of the first stage of the Church building”. These conclusions could be applied to every church in NSW.

There is no information or conclusion within the Heritage Inventory that refers in any way to St Paul's Church Group as having “strong or special” historical associations with the life or works of a person or persons of importance in the course or pattern of Bankstown's cultural history.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.



## **Aesthetic Significance Criteria**

**Criterion (c) - An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area)**

*Guidelines for Inclusion: When an item shows or is associated with, creative or technical innovation or achievement. When it is the inspiration for a creative or technical innovation or achievement, is aesthetically distinctive, has landmark qualities or exemplifies a particular taste, style or technology.*

*Guidelines for Exclusion: When an item is not a major work by an important designer or artist, has lost its design or technical integrity. When an item's positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded or has only a loose association with a creative or technical achievement*

The Heritage Inventory concludes that "St Paul's ... demonstrates the work" of its architect, "who was responsive to trends in ecclesiastical architecture in the inter-war and post-war period". It continues that the church fabric is noteworthy for its quality brickwork and timber joinery and fittings, and the tower provides landmark value to the town precinct. Neither of these conclusions goes anywhere near the minimum threshold for LEP listing.

There is no information or conclusion within the Heritage Inventory that refers in any way to St Paul's Church Group as being important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the course or pattern of Bankstown's cultural history.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

## **Social Significance**

**Criterion (d) - An item has strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons**

*Guidelines for Inclusion: When an item is important for its association with an identifiable group or is important to a community's sense of place.*

*Guidelines for Exclusion: When an item is only important to the community for amenity reasons or is retained only in preference to a proposed alternative.*

The Heritage Inventory concludes that the "Church is socially significant due to the attachment of current parishioners, as demonstrated by their approach to Council, and their posting of an on-line petition in response to a perceived threat to the Church. It is also likely to be significant to those people whose family members are memorialised there or have their contribution to St Paul's acknowledged in the many plaques on its walls."

The references within the Heritage Inventory conclusion to those who formed an opposition to the potential demolition of the Church, directly places this aspect of the claimed social significance within the Guidelines for Exclusion. There is no evidence provided that raises the level of general social attachment common by any group of parishioners to the level of "strong or special".

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

### **Technical or Research Significance**

**Criterion (e) - An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the cultural or natural history of the local area)**

*Guidelines for Inclusion: When an item has the potential to yield new or further substantial scientific and/or archaeological information. When it is an important benchmark or reference site or type or provides evidence of past human cultures that is unavailable elsewhere.*

*Guidelines for Exclusion: When the knowledge gained would be irrelevant on science, human history or culture. When the item has little archaeological or research potential or only contains information that is readily available from other resources or archaeological sites. Where the knowledge gained would be irrelevant to research on science, human history or culture.*

The Heritage Inventory does not suggest that there is any aspect of the current buildings or their fabric that could add new understanding to the cultural history of Bankstown.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

### **Significance due to Rarity**

**Criterion (f) - An item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (or the cultural or natural history of the local area)**

*Guidelines for Inclusion: Where an item provides evidence of a defunct custom, way of life or process or demonstrates a process, custom or other human activity that is in danger of being lost. Where it shows unusually accurate evidence of a significant human activity or is the only example of its type. When an item demonstrates designs or techniques of exceptional interest or shows rare evidence of a significant human activity important to a community.*

*Guidelines for Exclusion: When an item is not rare or is numerous and not under threat.*

The Heritage Inventory for this criterion suggests that the linking of the Rectory to the Church is an unusual feature attempts to give status to what was apparently the result of poor design and planning. The Inventory then asserts that "the survival of the sequence of buildings which physically represent the history of St Paul's is also rare in the metropolitan setting." This is a ridiculous claim to make, given the numerous building ensembles around Sydney and further afield that grew over time and have retained much of their progressively constructed building fabric.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

### **Significance as a Representative Example**

**Criterion (g) - An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places; or cultural or natural environments (or a class of the local area's cultural or natural places; or cultural or natural environments)**

*Guidelines for Inclusion: When an item is a fine example of its type or has the principal characteristics of an important class or group of items. When an item has attributes typical of a particular way of life, philosophy, custom, significant process, design, technique or activity or is a significant variation to a class of items. Where it is outstanding because of its setting, condition or size or may be part of a group, which collectively illustrates a representative type. When an item is outstanding because of its integrity of the esteem in which it is held.*

*Guidelines for Exclusion: When an item is a poor example of its type or does not include or has lost the range of characteristics of a type. An item that does not represent well the characteristics that constitutes a type or variation from it.*

The Heritage Inventory for this criterion suggests that "St Paul's is representative of parish churches and communities that developed across greater Sydney in the 20<sup>th</sup> century." This is a claim that could be made for

every one of the hundreds of churches established across Sydney or NSW in the whole of the 20<sup>th</sup> century. The claim completely misunderstands the nature of this assessment criterion.

The evolution of the buildings and building fabric at St Paul's, starting with the inability to complete the initial master plan and nave/façade of the main Church, coupled with alterations to the Hall, the mix of subsequent low quality buildings and the general lack of any clarity in the final group, places the complex directly into the Guidelines for Exclusion for this criterion.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

### **Integrity**

Although not a formal heritage assessment criteria, the level of Integrity has a cross-cutting relevance to many of the formal criteria.

The Heritage Inventory claims that "St Paul's has a very high and unusual degree of integrity". This is at odds with the extant physical evidence, the historical evolution of the buildings and building fabric and the overall evidence provided in the Inventory.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.



*The extent of lost integrity within the current St Paul's Church and Church Hall is particularly noticeable when compared with the late 1930s photo, or the masterplan included above.*

*Source Google Street View*

## Conclusions reached during the preparation of this Objection

1. While the Heritage Inventory sheet for the property has been prepared by two respected historians, they have not reviewed and considered the nature of the current building fabric, its condition and integrity, or the evolution of the various buildings on the site. Accordingly many of their research conclusions are incorrect. They have omitted a range of analytical information that must lead to a different conclusion and recommendations to that contained in the Inventory sheet.
2. The existing heritage significance analysis has NOT been made against the thresholds for listing for each of the standard assessment criteria published by the NSW Heritage Council. Their analysis does NOT provide any analysis of the place that makes a case for listing. Accordingly, their recommendation for listing is flawed.
3. When the required heritage assessment is made against the required criteria and guidelines for inclusion, the unequivocal conclusion is that the St Paul's Church and Church Group DOES NOT meet a single one of the required entry thresholds. Accordingly, Council has no basis for moving forward with a proposal to list the Group as an item of the environmental heritage on Bankstown LEP.
4. The Council has given Development Consent (DA 907/2009) for the demolition of the entirety of the existing hall on the southern side of the site. This hall contains the remnants of the first church related building on the site (c1914). A Construction Certificate (CC-699/2009/1) in relation to this DA was issued by Bankstown City Council on 23 October 2010. The permitted demolition includes the free standing Vestry and small toilet block.
5. Despite its ability to demolish the Hall and outbuildings, the Church has no intention of doing so in the immediate future. These buildings provide useful spaces for the provision of the services that the Church offers to the Bankstown community. Until a realistic opportunity emerges for the provision of new facilities on the overall site, these buildings are likely to remain in service.
6. Church related activities on the subject site date back to the earliest decades of the 20<sup>th</sup> century and they have resulted in the periodic evolution of the site in terms of the buildings and building fabric in which that activity has taken place. This evolution is particularly clear in the two distinct architectural styles contained in the main Church building and in the alterations and additions made to the original Church Hall.
7. Heritage listing is highly likely to unnecessarily "freeze" this evolutionary development, severely restricting the capacity of the Church to evolve its services to the community.
8. The NSW Government has released a broader planning policy and development strategy for increased development in the immediate locality of the Church. This is part of a substantial urban growth corridor, a process that has already seen sites surrounding the Church property up-zoned for greater density. Heritage listing of the Church property is likely to prevent the Church from contributing to this overall strategy.
9. Heritage listing is also likely to prevent the Church from using its assets in an orderly and well considered manner to further its ability to provide services to the local community in Bankstown with a sustainable future pathway.



## Recommendations arising from this Objection

The Recommendations arising from this Objection are completely at odds with those contained in the Heritage Inventory. It is our belief that the Recommendations set out below are more soundly based on available information and on a rigorous application of the Heritage Assessment Criteria published by the NSW Heritage Council.

1. Council should accept that the St Paul's Anglican Church and Church Group at 459 Chapel Road, Bankstown DOES NOT meet any of the required heritage assessment criteria thresholds for listing as a heritage item on the LEP.
2. Council should take account of the existing Development Approval and Construction Certificate for the demolition of the remnant former chapel on the southern side of the Church building, being the remains of the original church related building on the site. These buildings can be demolished at any time.
3. Council should consider calling for the complete re-writing of the Heritage Inventory form that has been used to support the making of the IHO. The information and assessment contained in this Objection should be taken in to account when the Inventory is rewritten.
4. Council should formally resolve that the proposed LEP heritage listing of the St Paul's Church and Church Group will NOT proceed.

Yours faithfully  
GBA HERITAGE PTY LTD



Graham Brooks  
Director  
grahambrooks@gbaheritage.com

# **SUPPLEMENTARY HERITAGE REPORT**



**St Paul's Anglican Church  
459 Chapel Road, Bankstown  
February 2016**

This report provides supplementary heritage advice to support the heritage listing of St Pauls Anglican Church on the Bankstown LEP.

**Date:**

February 2016.

**Address and Property Description:**

459 Chapel Road, Bankstown  
Lot 26A, 27A and 28A, DP 7058  
Parish of Bankstown, County of Cumberland

**Authors:**

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# CONTENTS

<b>1. Introduction</b>	<b>4</b>
1.1 Background	4
1.2 Study Area	4
1.4 Methodology	5
<b>2. HISTORICAL EVIDENCE</b>	<b>6</b>
2.1 Richard Morgan's Grant	6
2.2 The Church of England in Early Bankstown	6
2.3 The Impact of the Railway	6
2.4 The Greenacre Park Estate	7
2.5 Development of the Site of St Paul's	7
2.6 Church Buildings	7
2.6 St Pauls' Importance to the Community	13
2.7 Norman Welland McPherson, FRAIA ARIBA	17
2.8 Conclusion	17
<b>3. PHYSICAL EVIDENCE</b>	<b>18</b>
3.1 The Church	24
3.2 The Rectory	24
3.3 Church Hall	27
3.4 The Vestry	31
3.5 The Amenities Block	32
3.6 The Garage	32
3.7 Other Site Features	33
	33
<b>4. COMPARATIVE ASSESSMENT</b>	<b>34</b>
4.1 Churches by Norman McPherson	34
4.2 Bankstown Context	43
4.3 Conclusions	44
<b>5. HERITAGE SIGNIFICANCE</b>	<b>45</b>
<b>6. GRADING OF SIGNIFICANCE</b>	<b>47</b>



# 1. INTRODUCTION

## 1.1 Background

Sue Rosen Associates were commissioned by Bankstown City Council to expand on an assessment conducted in 2015 as to the heritage significance of St Paul's. The aim of this report is to determine the level of significance of the various component parts of the site which includes, the original timber church now used as a church hall, the current church, the rectory, the vestry, a garage, an amenities block, gardens and a carpark.

## 1.2 Study Area



Figure 1 | The study area. 459 Church Street comprises 3 lots. Two lots address French Avenue and one addresses Chapel Road. [Six Maps]



Figure 2 | *An aerial view showing the general situation and development of the site. [Six Maps]*

## 1.4 Methodology

The methodology employed in this study conforms to the principles and guidelines of The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance 1999 and is also in accord with the criteria and guidelines prepared by the NSW Heritage Branch of the NSW Department of Planning for Heritage Assessments.

## 2. HISTORICAL EVIDENCE

### 2.1 Richard Morgan's Grant

St Paul's Anglican Church is situated on part of the 50 acre portion 48 of the Parish of Bankstown granted to Richard Morgan in March 1831. This grant ran south from Liverpool Road and was one of some 30 grants made in Bankstown that year.<sup>1</sup> [Some 30 years later, the grant was dissected by Chapel Road which was created to connect farms in southern Bankstown to Liverpool Road and access to city markets. Chapel Road, which was officially confirmed on 27 March 1860, cut a north-south transect through Morgan's grant. The intersection of Liverpool Road and Chapel Road, which Morgan's Grant abutted on the south, became the focus of commercial and administrative activity for Bankstown. Bankstown Post Office, St Felix's Catholic Church and School were established there and the first Bankstown Council Chambers were also established in the vicinity.<sup>2</sup>

### 2.2 The Church of England in Early Bankstown

In 1856 the Church of England called for the establishment of an Anglican school at Bankstown and in 1861 a one-room school, St Matthews, was established on Liverpool Road in the Bankstown Village Reserve on the northern side of Liverpool Road, in present day Yagoona. In its early years the school had difficulties maintaining student numbers and retaining staff despite some 400 people including 80 children resident within a 2.5 mile radius. Most families were poor, living by selling firewood or on small farms. Attendance problems continued into the late 1860s and 1867 the School Board offered the premises to the State Council of Education for use as a state school. The Council took up the offer and St Matthews closed in May 1868 to open in July as Bankstown Public School. The building continued to serve as a church until the establishment of St. Paul's when the focus of Bankstown moved south, closer to the newly established railway.<sup>3</sup>

### 2.3 The Impact of the Railway

The establishment of the railway was the single most important factor to influence the development of modern Bankstown. In December 1906, the Authorising Act for its extension from Belmore to Chapel Road was passed through the NSW Parliament. A tender was accepted for construction of the line in November 1907 and it was finally declared open on 14 April 1909. Bankstown was presented by developers, such as Arthur Rickard, as a healthy residential alternative to the inner city slums. As a consequence land that had always been of marginal agricultural worth became valuable residential real estate. Workers could labour in the city, raise their families in a rural environment on quarter acre blocks, and grow vegetables in their leisure hours. It was from this time that the Bankstown Municipality's urbanization can be dated and a population boom was first experienced. Population growth was steady and by 1910 the population of the municipality had reached 2000. North and South Terrace were created in response to railway development at this time.<sup>4</sup>

The focus of the Bankstown Municipality, where the town hall had been constructed, moved from the intersection of Chapel Road and Liverpool Road to the vicinity of Bankstown Station. The southern drift in the municipality's focus was recognized when the original Bankstown Public School was renamed Bankstown North in October 1913. The final capitulation came in 1918 when the old Bankstown Post Office closed and reopened near the station.<sup>5</sup>

<sup>1</sup> LPI: CT: Vol. 2412 Fol. 67

<sup>2</sup> Sue Rosen, *Bankstown: A Sense of Identity*, Hale & Iremonger, Sydney, 1996, pp.47-59

<sup>3</sup> Rosen, pp.50-53.

<sup>4</sup> J.H. Forsyth, 'Historical Notes On Bankstown Line', Vol.1, Public Transport Commission of New South Wales, 1976, p.16; SRANSW, Archives Section, 'Station & Track Data', Vol.1, 1988, p.118; Mrs Fraser, *Souvenir Of Bankstown*, 1922, n.p. ML Q991.1/F

<sup>5</sup> Rosen, 1996, pp.80-81.

## 2.4 The Greenacre Park Estate

Coinciding with the establishment of the Bankstown line was the formation of the Greenacre Park Estate by Arthur Rickard. The estate was bounded by Liverpool Road, Chapel Road and Hillcrest Avenue and the railway line. Some 283 houses were constructed in the Bankstown Municipality in 1913 and these were mostly within walking distance of a station and the site of St Paul's. In that year alone the population increased by 700. Whilst the building boom of 1912-1914 was curbed by the Great War, the population of Bankstown continued to expand. Despite wartime losses, the second decade of the twentieth century was one of overall population growth.<sup>6</sup> Gradually, services in the area developed, including the Bankstown District Friendly Societies Association which was established in 1914 and in 1919 an affiliated dispensary to assist with the provision of medical care and pharmaceuticals.<sup>7</sup> The establishment of St Paul's Church on the corner of Chapel Road and French Avenue was integral to this phase of Bankstown's development.

## 2.5 Development of the Site of St Paul's

St Paul's is located lots 26, 27 and 28 of Section A of the Greenacre Park Estate. Lot 26, the most eastern of the three lots, was purchased by Ethel Nield, wife of Roscoe Nield of Lakemba in August 1913. In February 1914, lots 27 and 28 were purchased by John Kent, Wilfred Law Docker and Henry Wallace Mort. Mort was described as a clerk in holy orders and it is assumed that these men were church representatives. Not long after, in June 1914 the Anglican Archbishop of Sydney licensed, St Paul's Bankstown and inducted the rector, the Rev W. Rutledge Newton to the 'newly formed parish'. In October 1914 lot 26 was also acquired by Kent, Docker and Mort. In February 1923 the property was transferred to the Church of England Property Trust, Diocese of Sydney.<sup>8</sup> The establishment of St Paul's at this location at this time is a reflection of the change in focus of the Bankstown Community, arising from the location of Bankstown Railway Station and of the central role of the church on the community.

It is commonly asserted in reference to St Paul's that it was constructed in 1912. The wedding of George Griffiths and Amy White is recorded at the "Church of England Hall, Bankstown" in December 1912 may support this view.<sup>9</sup> The discrepancy in the evidence has not been resolved, it may relate to an earlier hall elsewhere, as there was certainly a Church of England congregation in Bankstown prior to 1914, or possibly the hall was constructed prior to purchase. Officially, there was no "St Paul's" until 1914. Construction may have been as late as 1920, with the induction of the rector merely marking the beginning of the establishment of St. Paul's Parish. The first contemporary reference to "St Paul's" in use is to a wedding in November 1916.<sup>10</sup> The precise date of construction has not been determined

## 2.6 Church Buildings

An extension to the timber St Paul's constructed c.1914-1920 was dedicated on 10 October 1926 by Archdeacon Charlton.<sup>11</sup> In 1928 a film hall in Kitchener Parade was acquired to serve as a Parish Hall.<sup>12</sup> In June 1938 architect, Norman Welland McPherson, who had a strong ecclesiastical architectural practice, called for tenders for the new church.<sup>13</sup> The contract for the construction of the new church was let to local builder W. G. Wilson in the first half of August and in October 1938 the foundation stone was laid.<sup>14</sup> The church was partially completed in March 1939 and consisted of the chancel and one bay of the nave. A

<sup>6</sup> Peter Spearritt, *Sydney Since The Twenties*, Hale and Iremonger, Sydney, 1978, p.27

<sup>7</sup> Rosen, 1996, p.87.

<sup>8</sup> LPI: CT: Vol. 2412 Fol. 67; CT: Vol. 2361 Fol. 19; *SMH*, 20 June 1914, p.6

<sup>9</sup> Transcription of Wedding Certificate of George Sydney Griffiths and Amy Linda White.

<sup>10</sup> *Mudgee Guardian and North Western Representative*, 30 November 1916, p.11

<sup>11</sup> *SMH*, 9 October 1926, p.9.

<sup>12</sup> St Pauls Anglican Church Bankstown, "Sunday News", Sunday 11 March 2012 in Bankstown Historical Society Vertical File: St Paul's Church

<sup>13</sup> *SMH*, 21 June 1938, p.5; *The Bankstown Observer* 23 October 1963, p.11 in Bankstown Historical Society Vertical File: St Paul's Church "Projected Works", *Sydney Morning Herald*, 12 July 1938, p.3.

<sup>14</sup> "Contracts Let", *Sydney Morning Herald*, 9 August 1938, p.6.



perspective study of St Paul's drawn in McPherson's office shows that the church was intended as the centerpiece of a formal, symmetrically planned complex of buildings. To the north of the church, adjacent to French Street, there was planned what appears to be a rectory while a new church hall was located to its south. The two subsidiary buildings were to be separated from the church by small courtyards that were screened on the west side and enclosed on the east side by a transept that also linked the buildings to the church.



Figure 3 | *Perspective study of the complex of buildings at St Paul's as envisaged by Norman McPherson [St Paul's]*

The second part of the church was commenced in 1958. The additions to the building were dedicated on 2 April 1961 (Easter Day) by the Hon Rev H. R. Gough, Anglican Archbishop of Sydney and Primate of Australia.<sup>15</sup> The works included the narthex, tower and porch, executed in a more contemporary idiom than the earlier sections. It has not been established who designed these additions, but it may well have been Norman McPherson of McPherson & Harrison. The church was not consecrated until 1968 when the debt was paid off.<sup>16</sup> Over the years stained glass windows were installed in the church, all credited to Martin van der Toorn of Lakemba.<sup>17</sup>

Coinciding with the extension of the church, in 1960 the church hall, formerly the original chapel, was extended toward Chapel Road. In 1967 the church hall kitchen was redesigned and renovated, followed in 1969 by reconfiguration of the front facade in brick to match the church.<sup>18</sup> A kitchen upgrade, replacing a

<sup>15</sup> "Primate to visit Bankstown to dedicate St Paul's Church additions", *The Torch*, 23 February 1961, p.15.

<sup>16</sup> St Paul's Anglican Church Bankstown, "Sunday News", Sunday 26 February 2012 and 1 April 2012 in Bankstown Historical Society Vertical File: St Paul's Church

<sup>17</sup> "Rector's Letter", *The Bankstown Anglican*, April 1970, no pagination (p.1.) Post war Dutch migrant Martin van der Toorn purchased "goods and chattels" of the prominent stained glass manufacturing company of Ashwin & Co during the 1960s. He had worked with the company from 1951 to 1956 and is one of a small number of artists credited with channeling the influence of a renaissance in stained glass after World War II in Europe (Beverley Sherry, *Australia's Historic Stained Glass*, p.34; <http://www.stainedglass.com.au/page/restoration>, <http://www.acmssearch.sl.nsw.gov.au/search/itemDetailPaged.cgi?itemID=455801>, accessed 6 February 2016).

<sup>18</sup> St Paul's Anglican Church Bankstown, "Sunday News", Sunday 1 April 2012 in Bankstown Historical Society Vertical File: St Paul's Church.

1967 renovation, to the Church Hall was undertaken during 2012.<sup>19</sup>



**Figure 4 |** *The Church Hall shortly before renovation. [Bankstown Observer, 3 August 1966, p.1]*

Until at least 1943 the rector lived in accommodation rented locally, in November 1943 the Rev. Herbert Marshall was evicted after seven years of residency and took up residence in a sectioned off portion of the hall. This situation that would not have occurred had the church had a residence. This may have arisen because of accommodation shortage associated with the war and Bankstown's prominent role in the war. With materials shortages – the construction of a rectory was not likely to have been achieved in the short term.<sup>20</sup> In 1970 the Chapel Road frontage of the rectory was extended to accommodate meetings and Sunday school classes.<sup>21</sup>

These works were accomplished with the active input of the parishioners, which was maintained across decades. For example, in 1957 volunteers painted the exterior of the hall and on Saturday mornings conducted an opportunity shop selling cakes and sweets the hall porch to raise money for two stained glass windows for the apse of the church.<sup>22</sup> Other activities to aid with the completion of the church was an investment scheme, a Gilbert and Sullivan concert and performances by the St Paul's Dramatic Society.<sup>23</sup>

<sup>19</sup> "Sunday News", 26 February 2012, 11 March 2012, 1 April 2012, 1 July, no pagination.

<sup>20</sup> *The Daily Telegraph*, 29 November 1943 p.5 in Bankstown Historical Society Vertical File: St Paul's Church.

<sup>21</sup> "Sunday News", 26 February 2012, 11 March 2012, 1 April 2012, 1 July, no pagination.

<sup>22</sup> *The Torch Bankstown*, 11 July 1957, p.15 in Bankstown Historical Society Vertical File: St Paul's Church.

<sup>23</sup> *The Torch Bankstown*, 15 July 1957, p.14 in Bankstown Historical Society Vertical File: St Paul's Church.



Figure 5 | *Front view of the original St Pauls [Bankstown Historical Society, Image No. 784]*



Figure 6 | *The original St Paul's [Bankstown Historical Society, Image No. 767]*



Figure 7 and 8 | *McNamara-Claire wedding, 26 September 1936 [State Library of NSW digital order no, hood\_31624 and hood\_31621, Sam Hood photographs]*





Figure 8 | *The new Church and the old. The old church had been extended, c.1926-1928, to the rear and to the side to accommodate the choir stalls and vestry. [Bankstown Historical Society, Image No. 785]*



Figure 9 | *Circa 1940 photograph of the interior of St Paul's. The pews have since been replaced. The photograph suggests that the high windows in the apse may not have yet received leadlight glazing. [Bankstown Historical Society, Image No. 767]*

## 2.6 St Pauls' Importance to the Community

St Paul's has a long tradition of contributing to the community and of community involvement in St Paul's. This includes cultural activities such as sponsoring eisteddfods, the first being held in 1928 at the parish hall in Kitchener Parade.<sup>24</sup> Sports were an important element of the 1930s, with teams competing in inter-church competitions, which were reported in the press. For example, in May 1930 the junior hockey team was defeated by the Botany Baptists 3-1.<sup>25</sup> Their soccer team played in the Protestant competition, with St Paul's juveniles defeating the Wardell Road Methodists 3-1 in June 1930.<sup>26</sup> Other groups included a Girls Club, and a Women's Guild.<sup>27</sup>

On 1 November 1932 the Returned Soldiers League in association with the state wide employment drive held a meeting at St Paul's Parish Hall in Kitchener Parade inviting professional and business men to assist in securing employment for ex-servicemen in the district.<sup>28</sup> Other events of the 1930s included a "mission" held by the Church Army campaigners in 1933.<sup>29</sup> St Paul's choir participated in St Andrew's Day celebrations in November 1934.<sup>30</sup> In the late 1950s the Church of England Boys Society used the hall to hold a talent quest on Saturday evenings.<sup>31</sup>

In 1983 St Paul's successfully applied to Bankstown Council for permission to occupy some of the church buildings for a choir school to cater for some 12 to 15 primary school aged boys gifted in singing and with musical ability. The school was to cater for the usual range of academic subjects but was to have a special emphasis on singing and music. It was to operate independently from the other church activities on the site, but would use the church, the hall and meeting room attached to the rectory.<sup>32</sup> The St Paul's Choir School which operated on the site until 1991 was the foundation school of what became Georges River Grammar School.<sup>33</sup>

It is impossible to document in such a brief assessment the extensive role of St Paul's in the Bankstown community and the contribution it has made to the lives of Bankstownians. Equally the contribution of members of the community to St Paul's is also prolific and a great deal of evidence of this can be found recorded in the fabric of the structures and grounds. For example, in the garden beds there are plaques where the ashes of parishioners have been placed including the prominent English family. The windows in the church were donated by parishioners, often to memorialise loved ones, such as that donated by a Mr Olaf depicting Saint Olaf. Furniture was also donated by parishioners, including bookshelves, noticeboards and the dedication plaque for the Tower, gallery, porch and narthex from 1961. Doors, pews and windows were all donated by community members. The details of these have been documented by the Bankstown Historical Society. There are 25 windows and some 72 other items in the church that document the community's involvement. For example, one brass plaque, reads "The Holy Table, Communion Rail and Sanctuary Chair, Lectern, are the work and labour of love of Herbert H. Dearia". Attached to the sanctuary doorway is a plaque which states: "This doorway is erected to the Glory of God and in memory of Frederick Charles Arnott. Nov. 4th 1956." Under the stained glass window depicting the Good Samaritan is a plaque reading: "To the Glory of God and in loving memory of Raymond Edward Fitzpatrick, 1909-1967". Fitzpatrick was a very well known local identity, with strong connections to council. The brass plaque for the sanctuary chair reads: "to the Glory of God and in cherished memory of Allan Richard Maunsell AB RAN who succumbed to injuries received in enemy action on HMAS Australia on 21st October 1944. A scholar, Sunday School Teacher and communicant of this Church. This chair is the gift of his comrades and fellow members of

<sup>24</sup> *South Coast Times and Wollongong Argus*, 11 May 1928, p.13.

<sup>25</sup> *Truth*, 25 May 1930, p.6

<sup>26</sup> *Truth*, 15 June 1930, p.5

<sup>27</sup> *The Muswellbrook Chronicle*, 15 Dec 1931, p.2

<sup>28</sup> *SMH*, 27 October 1932, p.13

<sup>29</sup> *SMH*, 4 March 1933, p.7

<sup>30</sup> *SMH*, 1 Dec 1934, p.21

<sup>31</sup> *The Torch Bankstown* 11 July 1957, p.15 in Bankstown Historical Society Vertical File: St Paul's Church

<sup>32</sup> BCC: P.32/199/459/26

<sup>33</sup> Georges River Grammar at [www.grg.nsw.edu.au](http://www.grg.nsw.edu.au)

the church. L. Bramble AIF, J. Cross RAN, N. Marshall RAN.<sup>34</sup>

In recent years the Parish has been approached by various developers with a view to redeveloping the site, but the position of the church on the lot has inevitably meant that redevelopment would require demolition of the Church. Increasingly with a diminished congregation the Church has been unable to meet its running costs and after another inquiry from a developer the Parish at their Annual Meeting in March 2015 decided to again investigate redevelopment of the site. That investigation is on going.<sup>35</sup>

Distressed by the prospect, a number of parishioners launched an on-line petition objecting redevelopment and approached Bankstown Council to impose an Interim Conservation Order over the site has been launched by the community to defeat the proposal and save St Paul's from redevelopment.



Figure 10 | An appeal to the community for funds to complete the church [Bankstown Historical Society, Vertical File: St Paul's Bankstown]

<sup>34</sup> Bankstown Historical Society Vertical File: St Paul's Church.

<sup>35</sup> Personal Communication Rev. Garry Bennetts



Figure 11 | *Women fundraising in the Church Hall [Bankstown Historical Society]*





Figure 12 | One of the many plaques testifying to the contribution of locals to St Paul's.



Figure 13 | Memorial plaques in garden on northern side of church, well known Bankstown families are represented here.

## 2.7 Norman Welland McPherson, FRAIA ARIBA

Norman McPherson was an architect who graduated from Sydney University and practised architecture from 1923 until the mid 1970s. Born at Hornsby in 1900, he attended Sydney Technical College in 1916 where he initially studied Engineering Trades but swapped to architecture, obtaining a Bachelor of Architecture in May 1923. An artist and an organist as well as an architect, he registered as an architect on 28 June 1923 and was employed by the architectural firm of Budden and Greenwell in 1924. He designed many churches in Sydney and New South Wales including the Chatswood Congregational Church and St Swithun's Anglican Church at Pymble and the New Methodist Church at Mayfield which were entered in the 1938 Architectural Exhibition of the Royal Australian Institute of Architects. McPherson also wrote occasionally on architecture for the *Sydney Morning Herald* on "The Small Church" in 1930 arguing that they did not need to be slavishly Gothic in style and "The Architect and Present Day Conditions" in 1932.<sup>36</sup> Other churches that he built include the New Methodist Church at Waitara dedicated in 1932.<sup>37</sup> He designed the Rawson Institute for Seaman.<sup>38</sup>

Although by 1930 McPherson was building small brick cottages and by 1933 blocks of flats (Balmoral Beach) and blocks of shops (Lakemba) the majority of his work was ecclesiastical and during the 1930s he designed Methodist churches at Waitara (1931), Balgowlah (1932), Bankstown, Manly (1932) Narooma (1935), Sutherland (1936), Mayfield (1937), and Wellington (1937-38), Eastwood (1941). The first design seems to have been Waitara, and this design was published in the *Sydney Morning Herald* in March 1931. In addition he designed the Baptistery for St Johns Church of England at Ashfield in 1932 and a congregational church at Chatswood (1933). By June 1952, in the post war period he had obtained 10 commissions for churches and also designed the National Methodist Church in Canberra. In the 1960s with his partner David Arthur Wilson Harrison, who registered as an architect on 25 June 1951 and began working with McPherson in 1954 before becoming a partner in the practice. In 1957 McPherson began to design hospital buildings, but continued with churches into the 1960s.<sup>39</sup> McPherson and Harrison were joined by Kenneth Allan Hassall in the early 1960s.

Three other churches designed by McPherson are heritage listed. They are:

- The Mosman Uniting Church and Hall, 38a Belmont Road, Mosman (Mosman Council);
- The Uniting Church Group (comprising Church, Parsonage and Fence), 134 Wagonga Street, Narooma (Eurobodalla Council);
- The All Saints Cathedral Group at Bathurst (1970 works), 11 Church Street, Bathurst (Bathurst Regional Council).

## 2.8 Conclusion

The suite of buildings that comprise St Paul's Bankstown are related to the NSW historic themes of Towns, Suburbs and Villages, and the themes of Education, Welfare, Religion, Social Institutions, Creative Endeavour and Birth and Death.

This brief and incomplete history of St Paul's reveals that St Paul's is a product of the community, a reflection of the community and an institution that was both a supporter of the community that was in turn supported by the community. The evidence of that long history is retained in the physical fabric of the building and further documentary research will undoubtedly add to the story of the place and its people.

<sup>36</sup> *SMH*, 20 September 1930, p.7 and *SMH*, 1 September 1932, p.80.

<sup>37</sup> *SMH* 13 October 1931, p.5.

<sup>38</sup> *SMH* 24 February 1932, p.14

<sup>39</sup> RAlA NSW Architects Bibliographical Information

### 3. PHYSICAL EVIDENCE

The St Paul's precinct comprises the church, church hall, and rectory, together with lavatory blocks and a garage. The site is located on the south eastern corner of the intersection of Chapel Road and French Avenue. The layout of the site is described in the following diagram.

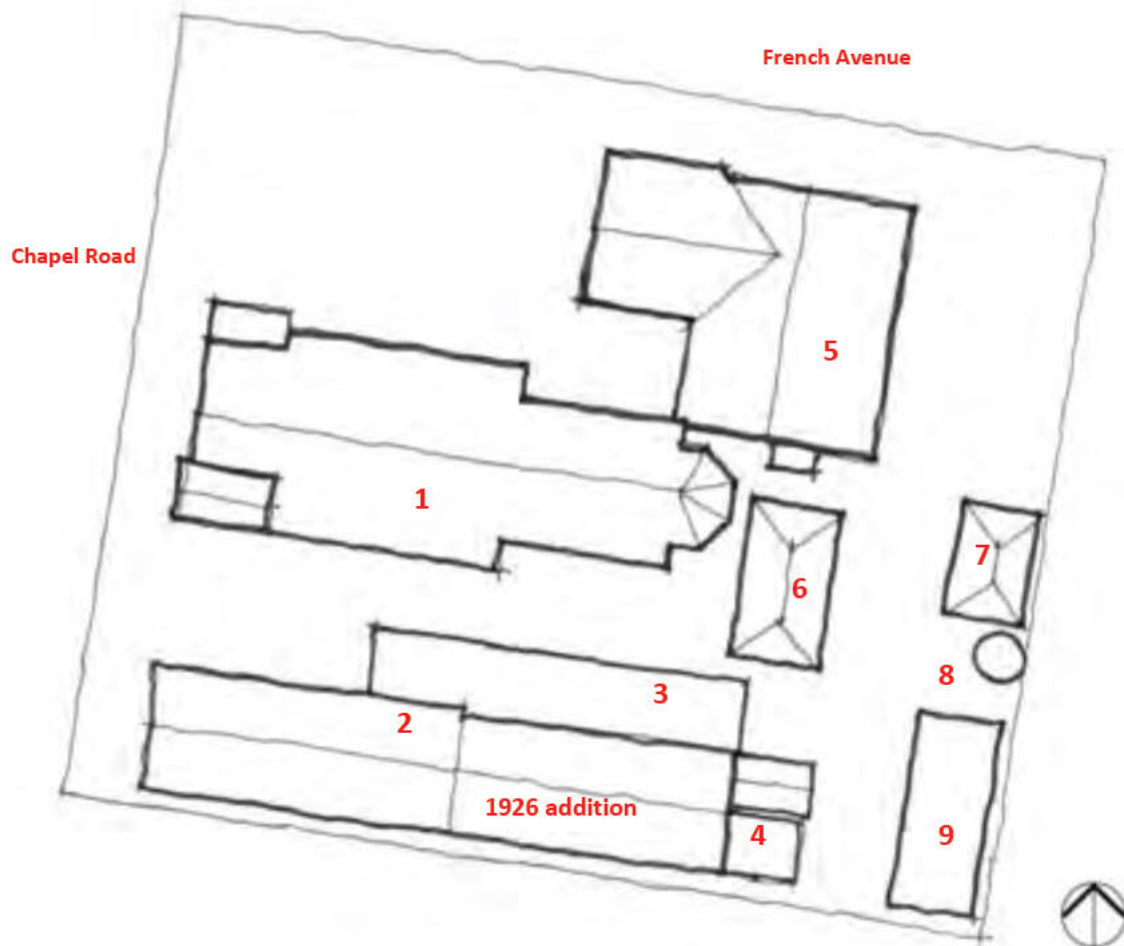


Figure 13 | Site plan - not to scale. [Hericon Consulting]

- 1 St Paul's Church
- 2 Church Hall - original section and 1926 addition
- 3 Church Hall annex
- 4 Toilet and storeroom
- 5 Rectory and 1970 meeting room
- 6 Vestry
- 7 Garage
- 8 Water Tank
- 9 Amenities block

### 3.1 The Church

St Paul's Church is a face brick building with a gabled and hipped roof covered with glazed terracotta tiles. The building is oriented to the west, facing Chapel Road. The church was built in two stages between 1938 and 1961. The two stages of construction are clearly evident on the exterior of the building. The earlier eastern section of the building, constructed during 1938, demonstrates the simplification of Gothic stylistic elements during the interwar period. It was intended as the centre piece of McPherson's development scheme that comprised the church flanked by the rectory and church hall sited at the rear, each with a screened garden. Projecting bricks on the northern and southern sides of the church provide evidence for proposed keying in of later brickwork for the proposed decorative screens. This original section contained the nave, side aisles, chancel and apse.

This section of the church is constructed with dichromatic face brickwork laid in stretcher bond. The upper section of wall below the roof line is terminated by a decorative soldier course. The north and south walls are divided into bays by regularly spaced piers, which hint at Gothic buttressing, while decorative short piers "supported" off shallow corbels mark gable roof ends. Eaves are boxed and lined with fibrous cement or similar. The roof has boxed eaves. Architraves are formed by slightly projecting bricks laid in stack bond and soldier coursing around window and door openings, which have shallow pointed arch heads. Windows consist of steel framed sashes containing lead light glazing.

The 1961 addition, the western section of the church, includes the bell tower, north porch, west gallery, narthex (1961) and two bays that extended the nave and side aisles. The two bays repeat the detailing of the original section, but the narthex, porch and tower are considerably more restrained in design and reflect the simplification and modernisation of traditional church architecture that took place in NSW during the 1950s and 1960s. The west facade is relieved by vertical bands of narrow, white glazed tiles, and brick pilasters continued up to the gable, with the walls terminating at raked glazed panels. There is an understated central entry from Chapel Road. The tower and belfry has the same brick pilasters and inlaid tiles.

Inside, the church has walls constructed out of face brick and a polished timber board floor. The roof is supported off muscular king post trusses, which have been left exposed. The underside of the roof is lined with timber boards. The ecclesiastical furniture includes the marble font with timber cover, pulpit, altar rail, altar table and platform, and seating. There is an organ and organ loft on the south side, and choir gallery on the north side of the nave. The organ is not listed in G.D. Rushworth's 'Historic Organs of New South Wales' (1988) and would require further investigation into its maker.

St Paul's Church is described in the following photographs.



Figures 14 and 15 | *St Paul's Church viewed from the west (left) and north (right).*



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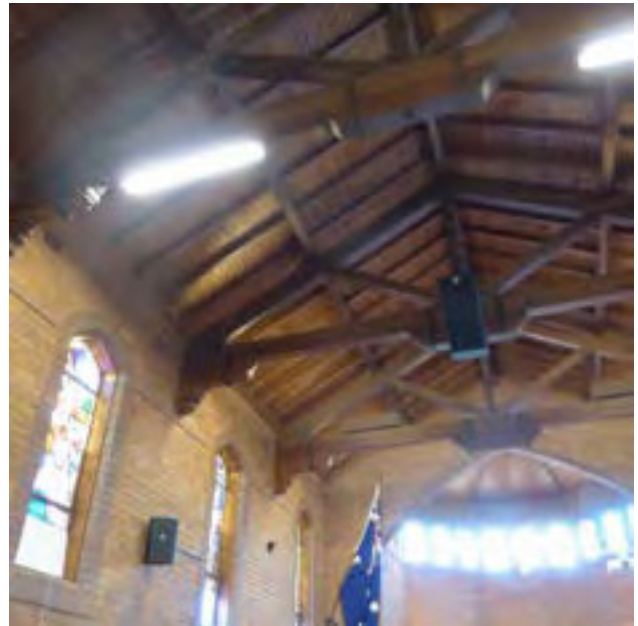
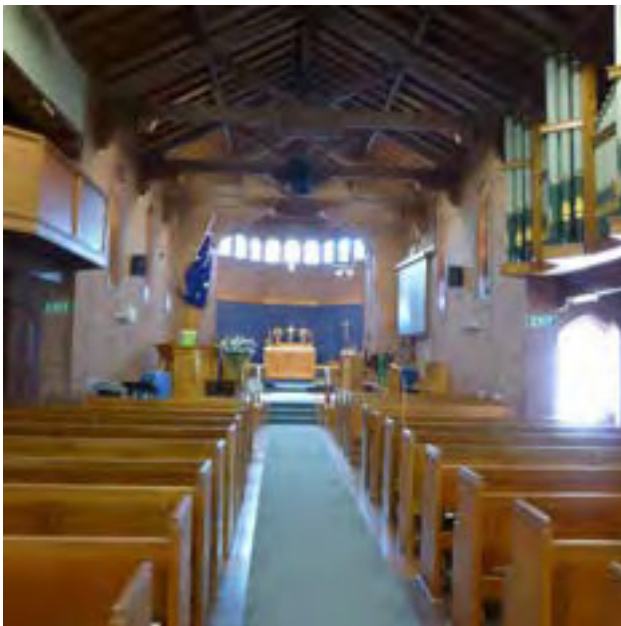
Figures 16 and 17 | *St Paul's Church viewed from the southwest. The hall is in the foreground (left); principal western facade and entrance (right). The doors are sheltered by a shallow canopy, while the face brickwork is relieved by slender vertical ceramic tile bands.*



Figures 18 and 19 | *Left: Simplified elements along the sides of St Paul's reflect the lingering influence of Gothic architecture, here suggested by the shallow pointed arches of window and door openings and the regularly spaced brick piers, which recall buttresses. The early 1960s tower takes the simplification of Gothic architecture even further. Corbelling at gable ends is also visible. The projecting bricks await the construction of screens that formed part of McPherson's original scheme. Right: the polygonal apse of St Paul's framed by the Vestry and the Rectory. The high band of windows is emphasised by the soldier course below the fascia board and projecting string courses above and below it.*



Figures 20 and 21 | Detailing of brickwork, which is darker in tone than bricks in the surrounding walls, around paired windows lighting the aisles (left); boarded door with decorative wrought metal hinges and handle at the rear of the church (right).



Figures 22 and 23 | Looking east along the nave towards the apse (left); exposed timber roof trusses supported off corbelled wall brackets- timber boards have been installed between the trusses to line the underside of the roof (right). The heads of windows are linked by a string course.



Figures 24 and 25 | Chancel at the eastern end of the church (left); altar within the sanctuary, located within the polygonal apse (right).

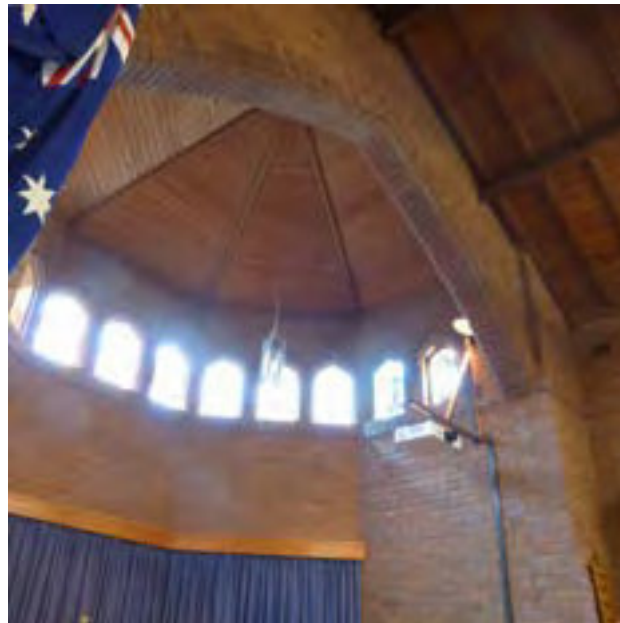
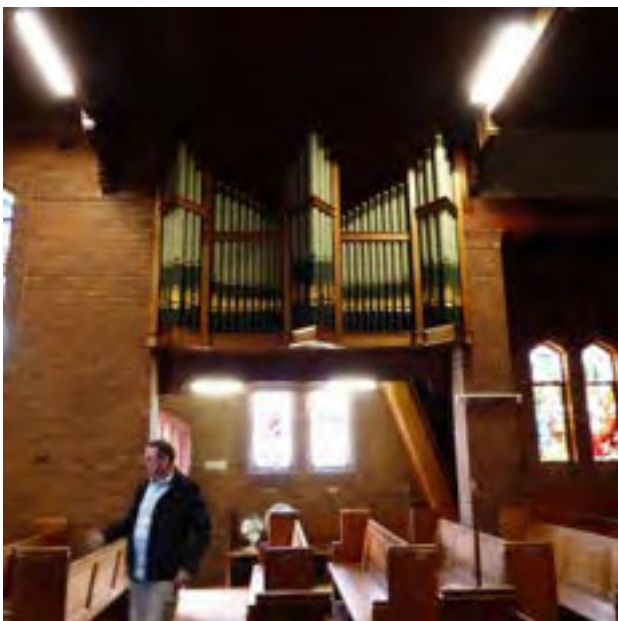


Figure 26 | Timber ceiling lining above the sanctuary. The shallow arch separating the apse from the nave is emphasised by contrasting molded bricks.





Figures 27 and 28 | Looking west along the nave from the chancel. The organ can be seen at left, with the cantilevered timber choir opposite (left); southern side aisle. The external piers are reflected by rhetorical buttressing pieced by arched openings. Timber bolsters carry the beam supporting the wall section, which is lined with acoustic panels, between aisle and nave. The vertical timber boards at right above the pews form part of the low balustrade wall across the gallery at the western end of the church (right)



Figures 29 and 30 | Organ loft (left); looking east along the nave from the gallery at the western end of the church, which formed part of the early 1960s works (right).





Figures 31 and 32 | *Rear section of the early 1960s gallery (left); detail of stair providing access to the gallery (right).*

## 3.2 The Rectory

Internal inspection of the Rectory was restricted out of respect for the privacy of persons occupying the building.

The rectory is a single storey brick dwelling sited at the rear of the property with frontage to French Avenue. Unusually, the rectory abuts the church chancel, and this was a feature of McPherson's proposed layout for the church. Windows are timber framed pairs of casement sashes. The building has no particular stylistic affinities but is characteristic of many dwellings that were constructed around the first half of the 1960s. The original section had a simple tiled gabled roof with timber shingles lining the north and south gables. The 1970 extension, which was constructed on the western side of the Rectory for the purposes of a Sunday school and meeting space, also has a gabled roof, the ridge of which is perpendicular to the ridge of the main roof, and its gable end is lined with fibre cement or similar. The extension has brick walls and glazed timber framed French doors with matching sidelights on its northern side.

The interior of the building contains bedrooms and an office which are served by internal corridors. Finishes and detailing are very representative of domestic architecture from the period during which the building was constructed. Walls are lined with cement render, ceilings are of fibrous plaster with simple cornices, timber joinery door frames and skirting boards are simple in profile and floors are covered with carpet, apart from the kitchen, bathroom and 1970 extension, which has polished timber boards. The laundry is located adjacent to the kitchen but is only accessible externally.



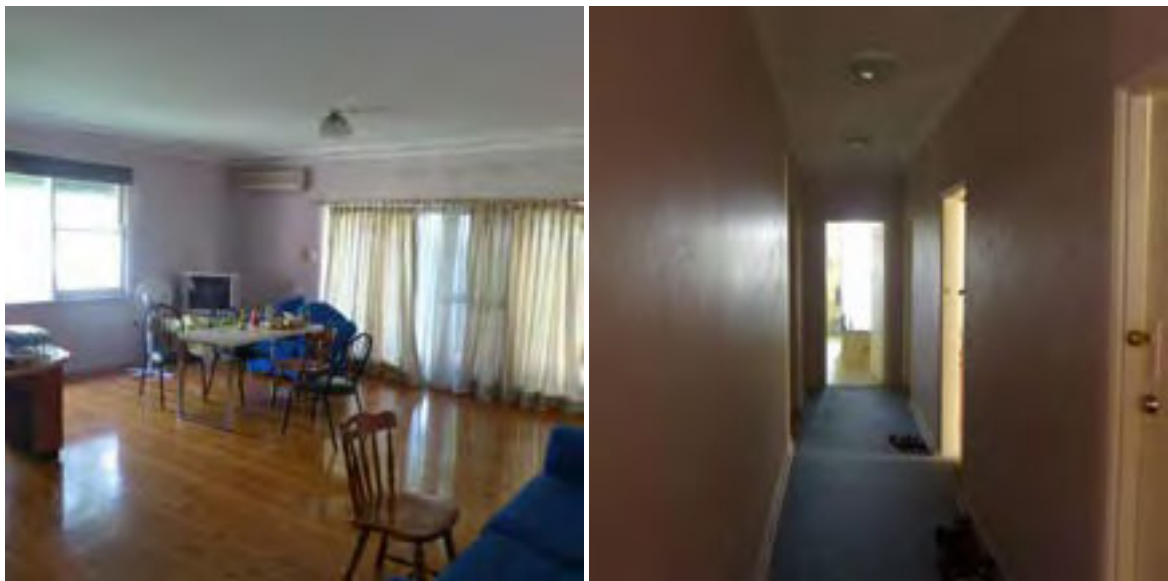
Figures 33 and 34 | *Southern end of the Rectory. The small covered porch provides access to St Paul's Church (left); the Rectory viewed from the northern side of French Avenue. This part of the site is screened by a proprietary steel fence.*



Figures 35 and 36 | *Northern end of the Rectory (left); the 1970 extension on the western side of the building (right).*

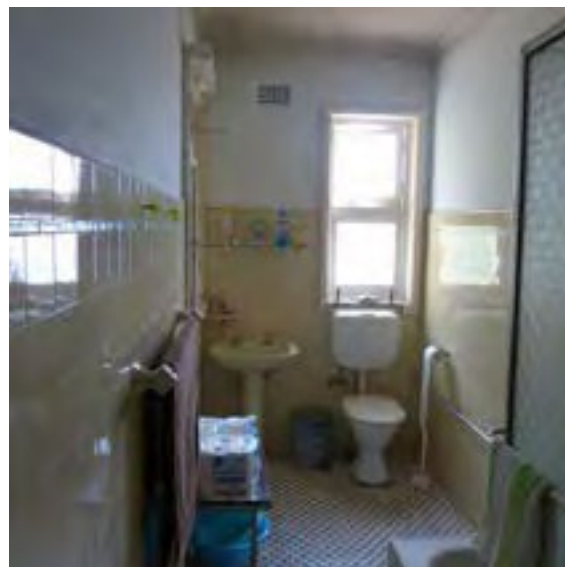


Figures 37 and 38 | *The main entrance to the Rectory is on its western side, adjacent to St Paul's Church and distinguished by a relatively generous porch with a simple flat roof supported off a timber post (left); French doors on the north side of the Rectory (right).*



Figures 39 and 40 | *Interior of the 1970 extension, which is distinguished by polished timber floor boards and cornices that are more elaborate than in other parts of the Rectory (left); the finishes and joinery in the corridor between bedrooms and other spaces are characteristic of the building as a whole (right).*





**Figures 41 and 42 |** *The cupboards and fittings in the kitchen are not original but are relatively recent. The kitchen also has polished timber floor boards (left); the bathroom has also been modified by the installation of more recent sanitary items and floor tiling but has retained original fabric such as wall tiles and towel rails. The original finishes are characteristic of the period during which the building was constructed (right).*

### 3.3 Church Hall

The western end of the church hall includes the original weatherboard church erected circa 1912-1914, which included three bays of windows. It was extended by a couple of bays in the middle of the 1920s, subsequently enlarged by a major extension to the east and the brick facade facing Chapel Road was added in 1961. The gable roof is of a shallower pitch than depicted in photographs of the inter-war era, and therefore was altered probably about 1961. The timber frames, external architraves and sills of the windows seem early, but the sashes have been replaced. While McPherson proposed a church hall on the south side of St Paul's Church, his intention was for a new brick structure at the rear of the site.

Early photographs of the hall indicate that the skillion-roofed section on its northern side was initially part of the 1920s works and extended when the eastern section was constructed. On the east end there is an addition to the hall with battened fibrous-cement sheeting. The building looks like a former hut of the Second World War era.

There are conflicting claims that the timber Church, now used as a hall was first constructed as late as 1920, other claims date as early as 1912, for which there is some documentary evidence. However the land was not acquired until 1914, for which there is also documentary evidence.

Apart from the western facade, the main portion of the building is clad with rusticated timber weatherboards. The skillion roofed section on the northern side of the building is lined with fibre cement or similar. The roof of the later eastern addition is lower than the eastern section of the hall. Double hung window sashes associated with the main hall are not original; windows in the northern skillion roofed section are aluminium framed sliding sashes. The roof of the building is covered with corrugated steel; the roof over the eastern addition is deteriorating while the skillion is covered with Colorbond finished corrugated steel.

The interior of the building has a higher level of integrity, retaining original timber floor boards, and wall and ceiling linings with battens over joints. Early timber joinery cupboards have also survived. The kitchen in the skillion roofed section is recently installed fabric.

At the eastern end of the building is a detached brick toilet block and a timber framed storeroom. Their date of construction has not been ascertained, but the detailing and fabric of the toilet suggest it was constructed during the 1960s.





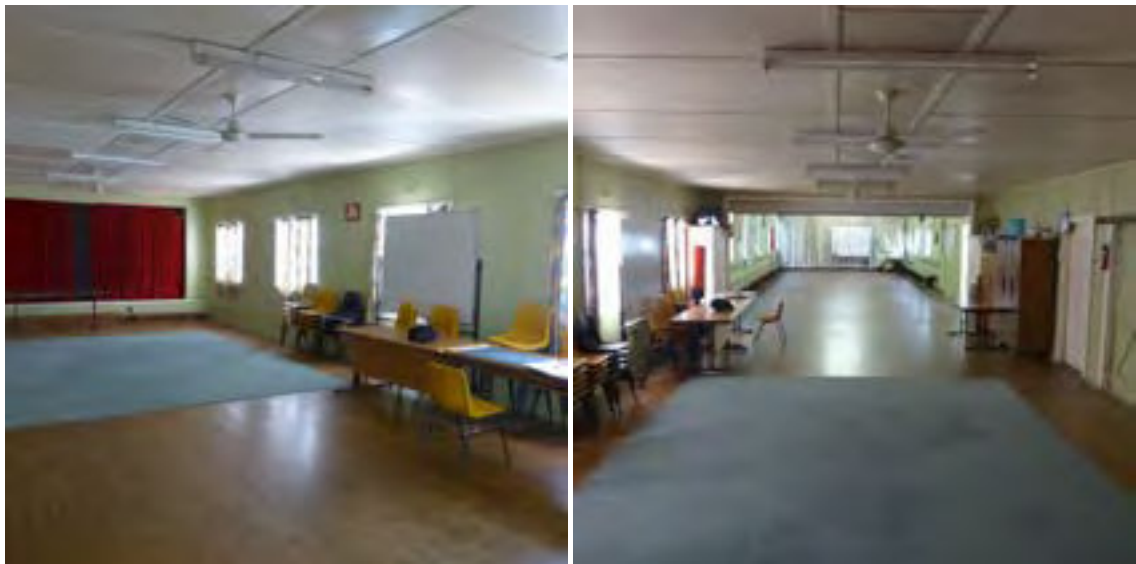
**Figure 43 |** *The Hall viewed from the west. The 1960s brick facade has been designed to harmonise with the western end of the Church.*



**Figures 44 and 45 |** *Rusticated timber weatherboards and recent windows on the northern side of the Hall (left); skillion roofed northern section of the Hall. The difference in roof level between the original section of the Hall (circa 1926) and the later eastern addition is clearly apparent, as is the differing condition of roof linings.*



**Figure 46** | *Circa 1960s toilet and storeroom at the eastern end of the Hall. The toilet block is connected to the Hall by an extension of its metal clad gabled roof.*



**Figures 47 and 48** | *The principal space within the Church Hall extends through the original section and the 1926 addition. These photographs show the interior of the addition looking towards the stage at its eastern end (left) and looking west from the stage (right). The two sections are linked by a wide opening that can be closed off by a roller shutter. The ceiling height of the addition is lower than the original section of the building.*



**Figures 49 and 50|** *Early fabric within the addition to the Hall includes this pair of timber doors on its northern side (left) and this Cupboard in its south western corner (right).*



**Figures 51 and 52|** *The skillion roofed section on the northern side of the Hall has been recently refurbished, as indicated by the kitchen (left) and other finishes throughout the structure. This mural is located in one of the section's ancillary spaces (right). Its authorship has not been ascertained.*

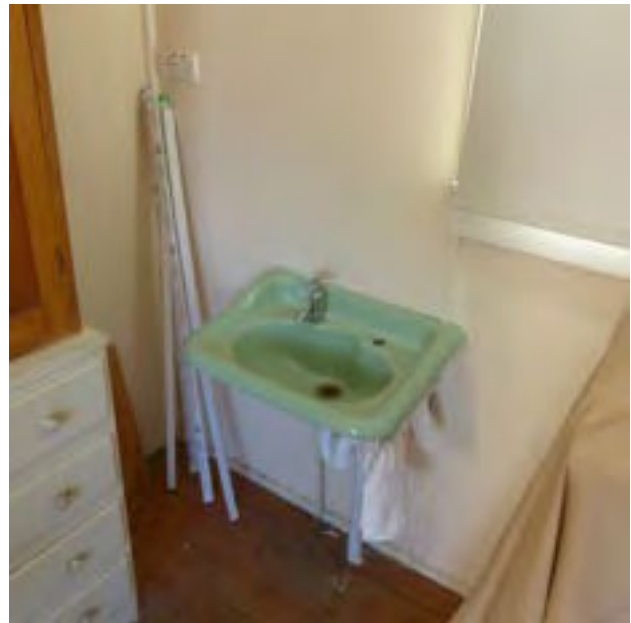
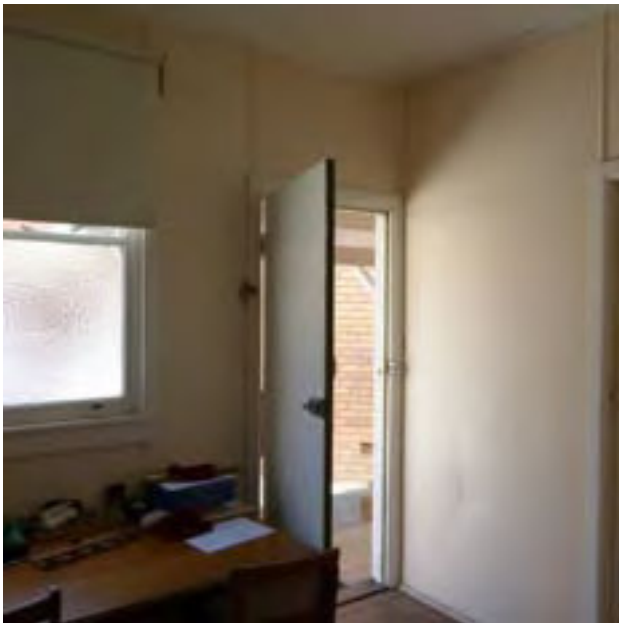
### 3.4 The Vestry

The Vestry is a small single storey timber framed building located to the immediate east of St Paul's Church and to the south of the Rectory. It was constructed circa 1960. Its walls are lined externally with timber weatherboards and its hipped roof is covered with terracotta tiles. Pairs of double hung timber framed windows, which extend to the eaves, provide natural light and ventilation. The Vestry contains two connected rooms, both of which have external access from the western side of the building. The door openings are sheltered by a porch formed by an extension of the roof plane that is supported off timber posts. A covered path links them to the Church.





**Figures 53 and 54 | Vestry viewed from the north east (left) and south west (right). The building is close to the apse of St Paul's Church and is connected to the Church by a short covered way, which can be seen in the photograph on the right.**



**Figures 55 and 56 | Details of the Vestry interior - fibrous plaster wall and ceiling linings with joints covered by slender timber mouldings, polished pine floor boards and an enameled hand basin in one corner.**



### 3.5 The Amenities Block

The Amenities Block is a recently installed flat roofed single storey prefabricated structure located at the south eastern corner of the site, which contains male and female lavatories. Its amenity has been improved by the provision of a shallow timber framed verandah on its northern and western sides, which provides sheltered access to the facilities within.



Figure 57 | *The Amenities Block viewed from the west.*

### 3.6 The Garage

The Garage is a small functional brick building located near the eastern site boundary, which is believed to have been constructed at the same time as the original section of the Rectory. The front of the Garage is aligned with the southern side of the Rectory. It has a hipped roof covered with glazed terracotta tiles. There is a relatively recent steel roller door in the northern side of the building and a timber framed window on its western side. A door opening on the southern side of the Garage has been bricked up. A water tank has been installed relatively recently behind the building, as has a proprietary Colorbond finish steel fence, which extends between the Garage and the Vestry.

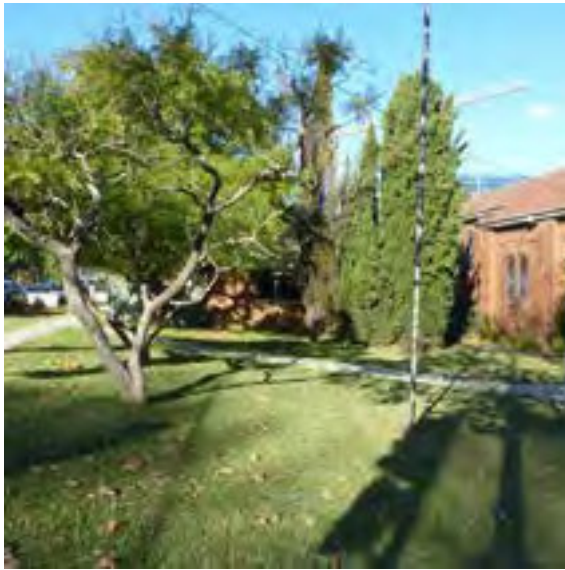


Figures 58 and 59 | *The Garage viewed from the north. The physical relationship between it and the Rectory and Vestry is apparent (left); the Garage and recently installed water tank viewed from the south west. Part of the Amenities Block can be seen at right (right).*

### 3.7 Other Site Features

There is lawn and some plantings on the French Avenue frontage, which includes a row of Jacarandas along the northern section of the site along French Avenue, a short row of cypress pines parallel to the western side of the church and to the west of the rectory, a small frangipani against the north side of the church near Chapel Road. Planting bed on the northern side of the church contains a number of commemorative markers with names of deceased parishioners engraved on metal plaques.

A large part of the site is paved. There is a wide expanse of concrete paving between the church and church hall and tar sealed paving across the eastern section of the site.



**Figures 60 and 61 | Jacarandas and cypress pines in the northwestern section of the site. A concrete path provides convenient access to the church from French Avenue.**



**Figures 62 and 63 | Concrete paving between the Church and Hall (left); asphaltic paving in poor condition across the eastern part of the site (right).**

## 4. COMPARATIVE

### 4.1 Churches by Norman McPherson

Norman McPherson was one of a number of architects who specialised in church design during the middle third. Others included Arthur Lanyon Clark, who designed numerous churches and halls for the Methodist, Presbyterian and Baptist denominations, John Burcham Clamp, who was building surveyor to the Anglican diocese of Sydney, and the firm of Fowell & McConnel (Fowell McConnel & Mansfield from 1935) designed a number of churches for the Roman Catholic denomination, as did Clement Glancey. These buildings were all marked by adherence to architectural idioms traditionally associated with western religion, most particularly the Romanesque and Gothic styles, but in a simplified and more retrained form. However, the interpretation of individual architects varied, with some churches stripping away detailed references and suggesting rather than depicting the characteristic elements of these styles. The use of brick predominated, which allowed small budgets to achieve attractive and well detailed buildings.



Figures 64 and 65 | *St Matthew's Church of England, Manly (left) was completed in 1930 to the design of Wright & Apperly working in association with John Burcham Clamp. Bricks were used externally and internally, as were exposed timber roof trusses. External decorative elements, which are specifically Gothic in detail, were executed in stone. By way of contrast, Fowell McConnel & Mansfield's St Mary's Roman Catholic Church at North Sydney (right) completed in 1938, suggests Romanesque architecture by the scale, form and massing of the building. The great simplicity of the building's stone exterior and brick interior is offset by a high standard of workmanship.*

Perhaps the earliest ecclesiastical building designed by Norman McPherson, who was a prolific designer of churches, was a school hall for the Hornsby Methodist Church, undertaken in association with H. M. Cook, Both were members of the congregation. The hall was completed in 1924.<sup>40</sup> In subsequent years McPherson designed churches for the Methodist, Congregational and Anglican denominations.

In 1930 McPherson acknowledged that the Gothic style was popularly associated with ecclesiastic architecture, but argued that true Gothic was the expression of a sophisticated structural system that was unnecessary for smaller churches and that a carefully simplified form could be appropriate. A "reverential

<sup>40</sup> "Circuit Notes", *The Methodist*, 5 April 1924, p.13.

atmosphere" was "essential in a church", which could be achieved without slavish copying of Gothic elements through a character of restraint and dignity resulting at least in part from the expression of the building's structure.<sup>41</sup> Several years later McPherson reiterated these thoughts, suggesting the possibilities of recently developed construction and acoustic technologies. He envisaged the church of the future:

There is now no excuse for bad acoustics and bad visibility ... I picture a structure of grand dignity, of stately massing, with long simple vertical lines, curving over at the top in the most dignified of all shapes, the semi-circle. A structure which will not speak in part but as a whole with a grand, stirring note, a structure built around a single theme as the grand musical structures of Bach and Handel were built.

There will be no appeal there to the passing whim for prettiness, but a deeper call to the finer taste. Internally there will be a sense of spaciousness enclosed by the massing of surfaces arranged in planes to make the play of light take its part in the general effect ...<sup>42</sup>

One of the earliest churches known to have been designed by McPherson was the Methodist Church at Waitara, which was dedicated in October 1931. It was similar in plan to St Paul's, with a central aisle leading to a chancel that was raised slightly above the main floor, and terminating in a sanctuary. The reredos was panelled in maple above which was a circular window opening intended to take an imposing stained glass memorial in the future. The choir was on one side of the chancel, the pulpit and organ on the other. Wall surfaces both externally and internally were of face brick, "of varying colours and texture, to give an interesting but soft effect" while the roof was covered with terracotta tiles. The ceiling was described as a "multi-sided open timber type" with a proprietary lining placed between exposed rafters. Windows were steel framed and intended to take leadlight glazing.<sup>43</sup>



Figure 66 | Waitara Methodist Church. The earlier church is to its left [Sydney Morning Herald, 13 October 1931]

<sup>41</sup> Norman McPherson, "The Small Church", *Sydney Morning Herald*, 20 September 1930, p.7.

<sup>42</sup> Norman McPherson, "Church Architecture. What of Today?" *Sydney Morning Herald*, 2 November 1935, p.9.

<sup>43</sup> "New Church For Waitara Methodists", *Sydney Morning Herald*, 31 March 1931, p.8; "Waitara Church", *Sydney Morning Herald*, 13 October 1931, p.5.



Over the next ten years McPherson was responsible for a number of churches that furnished their parishioners with buildings of high quality and character. Amongst them were:

The freely Gothic **Chatswood Congregational Church**, completed in 1933. It was constructed of "pressed brick with variegated coloured tiles" and was cruciform in plan. It boasted a prominent tower and spire and formed part of an overall scheme linking it to the existing church, which was to become a hall. The space between was paved and screened by an arcaded wall, prefiguring McPherson's scheme for St Paul's. The church consisted of a nave with two transepts, one of which was occupied by the choir and organ. The roof was supported off open timber trusses between which were acoustic linings; the reredos was panelled and surmounted by a rose window. Windows generally were steel framed and filled with leadlight glazing.<sup>44</sup>



Figure 67 | **Chatswood Congregational Church** [Willoughby Library File 6515/6515948]

The mildly Gothic **Roseville Methodist Church**, completed in 1935, which was built of "rich-toned brick" with a tiled roof, tower and spire. It accommodated 250 worshippers, who were surrounded by face brick walls inside, open timber roof framing, a chancel panelled in silky oak and a stained glass memorial window.<sup>45</sup>



Figure 68 | **Roseville Methodist Church** [The Methodist, 13 July 1935]

<sup>44</sup> "Congregational Church To Be Built At Chatswood", *Sydney Morning Herald*, 21 February 1933, p.5; "New Congregational Church", *Sydney Morning Herald*, 15 August 1933, p.4.

<sup>45</sup> "Church Development", *The Methodist*, 13 July 1935, p.1; "Roseville Methodist Church", *Sydney Morning Herald*, 12 November 1935, p.5.

**Mosman Congregational Church**, completed in 1937, which accommodated 300 parishioners. It was cruciform in plan, with a central aisle flanked by arcaded side aisles. According to the *Sydney Morning Herald*, "though the form of the building is traditional, the architectural treatment will echo the modern trend in design as applied to ecclesiastical work" - that is, simplified Gothic but with suggestions of Art Deco influence. As with McPherson's other churches, face bricks were used internally and externally and acoustic linings were introduced internally<sup>46</sup>. The Church was picturesquely massed with a prominent tower. Its colourful roof was covered with colour blended tiles.



Figure 69 | *State Heritage Inventory database entry for Mosman Uniting Church & Hall*

**Mayfield Methodist Church** was also completed in 1937 to accommodate 400 people. The church was planned as a Latin cross with a central nave flanked by colonnaded side aisles that continued into transepts. The exterior of the building was restrained, alluding to the Gothic without literal references. The building made much of face brickwork externally and internally, and external openings were emphasized by brick architraves. The floor of the church was timber. The asymmetrical façade of the church featured a tall tower, alongside which was a slender spire.<sup>47</sup>



Figure 70 | *Mayfield Methodist Church [collections.ncc.nsw.gov.au]*

**Wellington Methodist Church** was constructed during the second half of 1938. It was built of sandstock brick with a tiled roof and as originally built allowed for additions to increase its capacity. Local timber was used in the roof structure, which was exposed. The plan of the church included a nave, choir, sanctuary, two vestries and a chapel on one side of the building. The tower was kept low because of foundation conditions on the site, which also meant that the whole structure was reinforced with steel rods. Window openings had arched heads.<sup>48</sup>



Figure 71 | *Wellington Methodist Church [Sydney Morning Herald, 1 March 1938]*

<sup>46</sup> "A Mosman Church", *Sydney Morning Herald*, 30 June 1936, p.4.

<sup>47</sup> "Mayfield Methodist Church", *Sydney Morning Herald*, 3 August 1937, p.6.

<sup>48</sup> "Wellington Methodist Church", *Sydney Morning Herald*, 1 March 1938, p.8.

**St Swithun's Anglican Church**, Pymble was planned "along correct traditional lines for an Anglican Church of this size" and contained a nave, chancel, sanctuary, baptistery, side aisles, an organ loft and vestries.<sup>49</sup> It was one of McPherson's most distinctive churches in terms of its presentation to the street, in which pointed Gothic openings were punched into simple and rather squat wall planes. The use of stone externally was also unusual.



Figure 72 | *St Swithuns Anglican Church, Pymble* [Building, 24 October 1940, p.41.]

The asymmetrically planned **Eastwood Methodist Church** was completed in 1941 to accommodate a congregation of 300-400 people. While the exterior was constructed of brown face bricks, the interior was constructed with cream bricks. Openings were treated with brick architraves, as at St Paul's, while the tower was similar to the original concept at St Pauls. Exposed timber short-span roof trusses gave "an interesting and massive architectural effect" internally. Windows contained leadlighted sashes.<sup>50</sup>



Figure 73 | *St Swithuns Anglican Church, Pymble* [Building, 24 June 1941, p.33.]



Figure 74 | *Interior of Eastwood Methodist Church* [Building, 24 June 1941]

<sup>49</sup> "St Swithun's Pymble", *Building*, 24 October 1940, p.41.

<sup>50</sup> "Eastwood Methodist Church", *Building*, 24 June 1941, p.33.

The Romanesque and Gothic styles, long associated with ecclesiastical architecture, continued to endure into the post-war period, which witnessed the construction of a large number of churches as towns and cities grew and new parishes were formed. However, with the impetus of Modernism after the war the forms became even more simplified. Some architects experimented with imaginative structures to express the unique religious roles that churches played in the community. During the 1960s architects also responded to reflect changes in liturgies, which affected planning and was expressed architecturally through the manipulation of space within churches.



Figures 75 and 76 | *St Bernard's Roman Catholic Church at Botany, designed by Kevin Curtin and completed in the first half of the 1950s, demonstrates how architects experimented with advanced structural techniques, in this case tensioned parabolic arches, to determine the form and spatial character of the buildings [Roy Lumby Photographs]*



Figures 77 and 78 | *Architect Stan Smith of McConnel Smith & Johnson designed a series of Presbyterian churches during the 1960s that were directly informed by changed liturgical requirements, expressed in planning and the form of the buildings. They included the square Latin cross planned church at New Lambton (1966 and the square, diagonally configured church at Ryde (1961). [Roy Lumby Photographs; Architecture in Australia, March 1962].*



Whilst the additions to St Paul's could not reflect changing liturgy because of the original section, McPherson's office (assuming it was responsible for their design) dealt with them in a way that reflects the period. McPherson continued to work on numerous churches during the 1950s and 1960s. A newspaper article from 1953 noted that he had eight buildings "on the drawing boards" and that he was enthusiastic about exploiting new materials and building technologies in church architecture - "if there is not the money or the conditions to do [traditional Gothic forms] well it is far better to do something simple, which may be honoured by the name of 'living architecture' "<sup>51</sup>

The following illustrations demonstrate the range of buildings produced in McPherson's office during the post war era.



Figures 79| *The Methodist Wesley Church and Memorial Youth Centre in Wagga Wagga was designed during 1948. It was a major project that visually recalls McPherson's pre-war churches [The Methodist, 2 October 1948]*

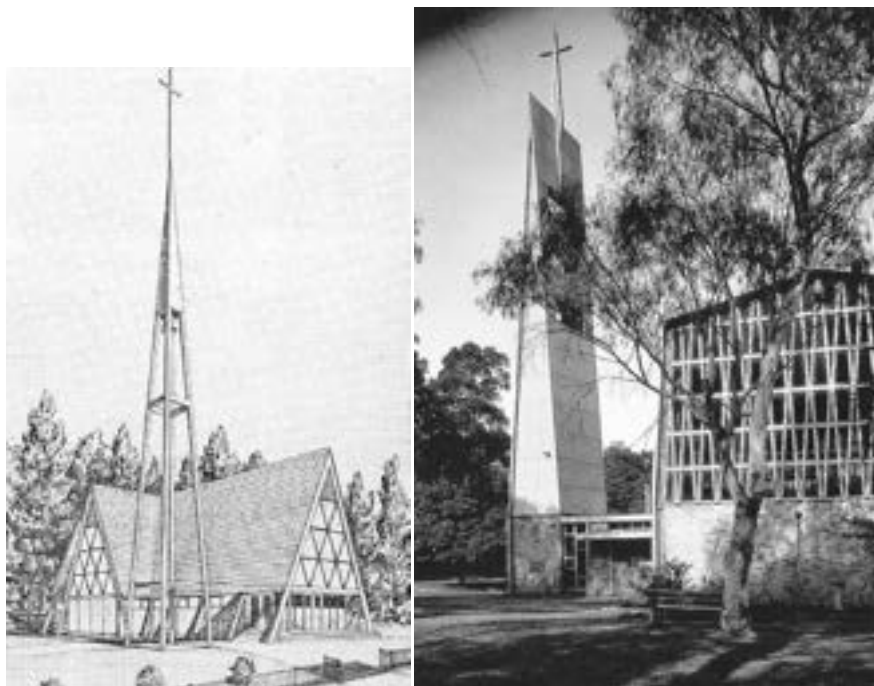


Figures 80| *One of McPherson's most significant post war projects was the National Memorial Methodist Church in Canberra, which was opened in November 1955. He was responsible for a nearby parsonage that was constructed during the 1930s. The church is a very simplified interpretation of Gothic architecture but similar in composition to his pre war churches [www.flickr.com]*

<sup>51</sup> "Sydney Church Building Revival", *Sydney Morning Herald*, 3 June 1953, p.13.



Figures 81 and 82 | *St Alban's Anglican Church Hall, designed around 1957 The adjacent 1920s Church was altered in the 1960s, possibly to McPherson's design - its principal front is similar to the western front of St Paul's* [Building, Lighting & Engineering, 24 April 1957; [www.sydneyorgan.com](http://www.sydneyorgan.com)]



Figures 83 and 84 | *The early 1960s St Matthew's Anglican Church at Eugowra is representative of many A-frame churches that were built during the 1960s (left), while the 1963 St Mark's Anglican Church in West Wollongong dramatically exploited structure and distinctively broke with tradition* [Building, Lighting & Engineering, September 1961; Robert Irving, Twentieth Century Architecture in Wollongong, Patrick Grant photograph]



**Figures 85 |** *Amongst McPherson's last church projects was the completion of All Saints Cathedral in Bathurst (1970). Its centralised planning and overall form reflects the changed liturgical circumstances of the Anglican Church [Roy Lumby Photographs]*

## 4.2 Bankstown Context

When Bankstown was proclaimed a municipality in 1895 it could boast three churches - an Anglican church, a Wesleyan (Presbyterian) church and a Roman Catholic church, associated with the Convent of St Joseph.<sup>52</sup> By 1919 there were five denominations represented, the three established churches being joined by the Baptist and Congregational Unions, and at least one other religion was represented after the local Jewish community opened a synagogue in 1913.

By the early 1930s, six Christian denominations were established in Bankstown, the more established churches being joined by the Church of Christ. At this time the local government area had some 28,000 inhabitants. There appears to have been relatively little church building during this decade, although further research may modify this conclusion. One notable exception was St Felix's Roman Catholic Church, which in 1932 published renderings of an ambitious proposal for the completion of its 1925 church, which leant towards classical forms of architecture.<sup>53</sup>

<sup>52</sup> "Bankstown. A New Municipality", *The Cumberland Free Press*, 21 September 1895, p.7.

<sup>53</sup> "St Felix's Church, Bankstown Blessed", *The Freeman's Journal*, 1 September 1932, p.18.



Figures 86 and 87 | Circa 1900 photograph showing St Joseph's Roman Catholic Church and Bankstown's Presbyterian Church (left); the proposed completion of St Felix, 1932 (right) [State Library of NSW PXA 635/38-40, digital order no. a105040, Broadhurst Postcard Publishers; The Freeman's Journal, 1 September 1932]

In the post war era churches in Bankstown, like many other localities, continued to be active. New parishes were formed to meet a growing population that was also diversifying as migrants from many parts of the world settled across Sydney. One example of this is Bankstown's Concordia Lutheran Congregation, which was established in 1947.<sup>54</sup> As is characteristic of Australian cities as a whole, Bankstown experienced increasing cultural, ethnic and religious diversification in the second half of the century, which accompanied its population growth. For instance there are Anglican, Catholic, Uniting and Baptist churches in Greenacre, along with a Church of Christ, a Korean Church and a Melkite Church. In Chester Hill there are Anglican, Presbyterian, Baptist and German Lutheran churches. This is reflected in the architecture of Bankstown's churches and the Christian denominations that have made use of them. They generally reflect the impacts of Modernism on traditional church architecture as well as changing liturgical circumstances. The following illustrations provide representative examples of the buildings, most of which were constructed during the 1960s.



Figures 88 and 89 | Greenacre Baptist Church (left); St Therese's Catholic Church at Padstow (right) [greenacrebaptist.org.au; www.sttherese.net]

<sup>54</sup> Sue Rosen, *Bankstown: A Sense of Identity*, p.139





Figures 90 and 91| *Padstow Congregational Church (left); Bankstown Uniting Church (right)* [[padstowcong.com](http://padstowcong.com); [commons.wikimedia.org](https://commons.wikimedia.org)]



Figure 92| *St Jerome, Punchbowl* [[familypedia.wikea.com](http://familypedia.wikea.com)]

### 4.3 Conclusions

The 1938 section of St Paul's Church is characteristic of Norman McPherson's 1930s churches - simplified Gothic, brick inside and out, tile roof, steel framed windows filled with leadlight glazing. It is also quite representative of 1930s church architecture generally. However, it is understood to be relatively uncommon in the context of the Bankstown local government area, where relatively few churches were built during the 1930s. The 1961 addition is representative of McPherson's post war work and of church architecture generally. The church has an added level of distinction because of the two different architectural expressions, which however are linked by use of materials, scale and simple detailing to form a unified and successful whole.

## 5. HERITAGE SIGNIFICANCE

***Criteria a) an item is important in the course, or pattern, of the Bankstown LGA's cultural or natural history.***

St Paul's Bankstown is capable of demonstrating the historic theme of towns, suburbs and villages reflecting the focal shift in the early twentieth century of Bankstown from the Liverpool and Chapel Roads intersection to the vicinity of Bankstown railway station. The site retains the original timber chapel and the more substantial brick church constructed in 1938 and 'finished off' in 1961. It is also able to demonstrate the theme of creative endeavour in its architecture and its fittings, many of which have local associations. The fabric and location of the buildings which make up St Paul's are evidence of the historic development of the area and its social history. The construction of the church in phases is also reflective of the socio-economic history of Bankstown. It is an important ecclesiastical survivor of Bankstown's development from the early decades of the Twentieth Century with a high degree of integrity and intactness prominently situated in central Bankstown on the major thoroughfare for much of the century, ie. Chapel Road. Its siting is also reflective of its role and estimation in the community.

***Criteria b) an item has strong or special association with the life or works of a person, or group of persons, of importance in Bankstown's cultural or natural history.***

St Paul's has historical associative significance due to its association with local identities, such as the Engisch and Fitzpatrick families who are significant figures in the history of Bankstown. These families and many others supported St Paul's and chose it as the site for memorialisation of their families in the form of plaques, windows and fittings of the church. These memorials are intact and have been maintained over many years by the community and have been recorded by the Bankstown Historical Society. St Paul's is also associated with noted ecclesiastical architect, Norman Welland McPherson, four other churches designed by McPherson are listed heritage items.

***Criteria c) an item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the Bankstown LGA.***

St Paul's has local aesthetic significance as it demonstrates the work of architect Norman Welland McPherson, who was responsive to trends in ecclesiastical architecture in the inter-war and post war eras and designed a number of significant buildings for the Anglican, Methodist and Congregational Churches. The site comprises the church and rectory of McPherson's planned development (ultimately incomplete) with its unusual, pre-Reformation, almost monastic enclosed grounds. The church fabric is locally noteworthy for its quality brickwork and timber joinery and fittings, and the tower provides landmark value to the Bankstown town precinct. The church is representative of McPherson's 1930s ecclesiastical architecture, providing Bankstown with the only known example of his work.

***Criteria d) an item has strong or special association with a particular community or cultural group in the Bankstown LGA for social, cultural or spiritual reasons.***

St Paul's is socially significant due to the strong attachment of current parishioners, as demonstrated by their approach to Council, and their posting of an on-line petition in response to a perceived threat to the Church. This is an identifiable group within the current community. St Paul's is also likely to be significant to those people whose family members are memorialised there or have had their contribution to St Paul's acknowledged in the many plaques on its walls.

***Criteria e) an item has potential to yield information that will contribute to an understanding Bankstown's cultural or natural history.***

The connection of the rectory with the church may have technical significance as it relates to the changing

aspirations of the parish in the implementation of McPherson's original design for the complex.

***Criteria f) an item possesses uncommon, rare or endangered aspects of Bankstown's cultural or natural history.***

St Paul's is an uncommon example of an inter-war church in Bankstown. The linking of the rectory to the Church is also an unusual feature. The survival of the sequence of buildings which physically represent the history of St Paul's is a local rarity.

***Criteria g) an item is important in demonstrating the principal characteristics of a class of Bankstown's cultural or natural places.***

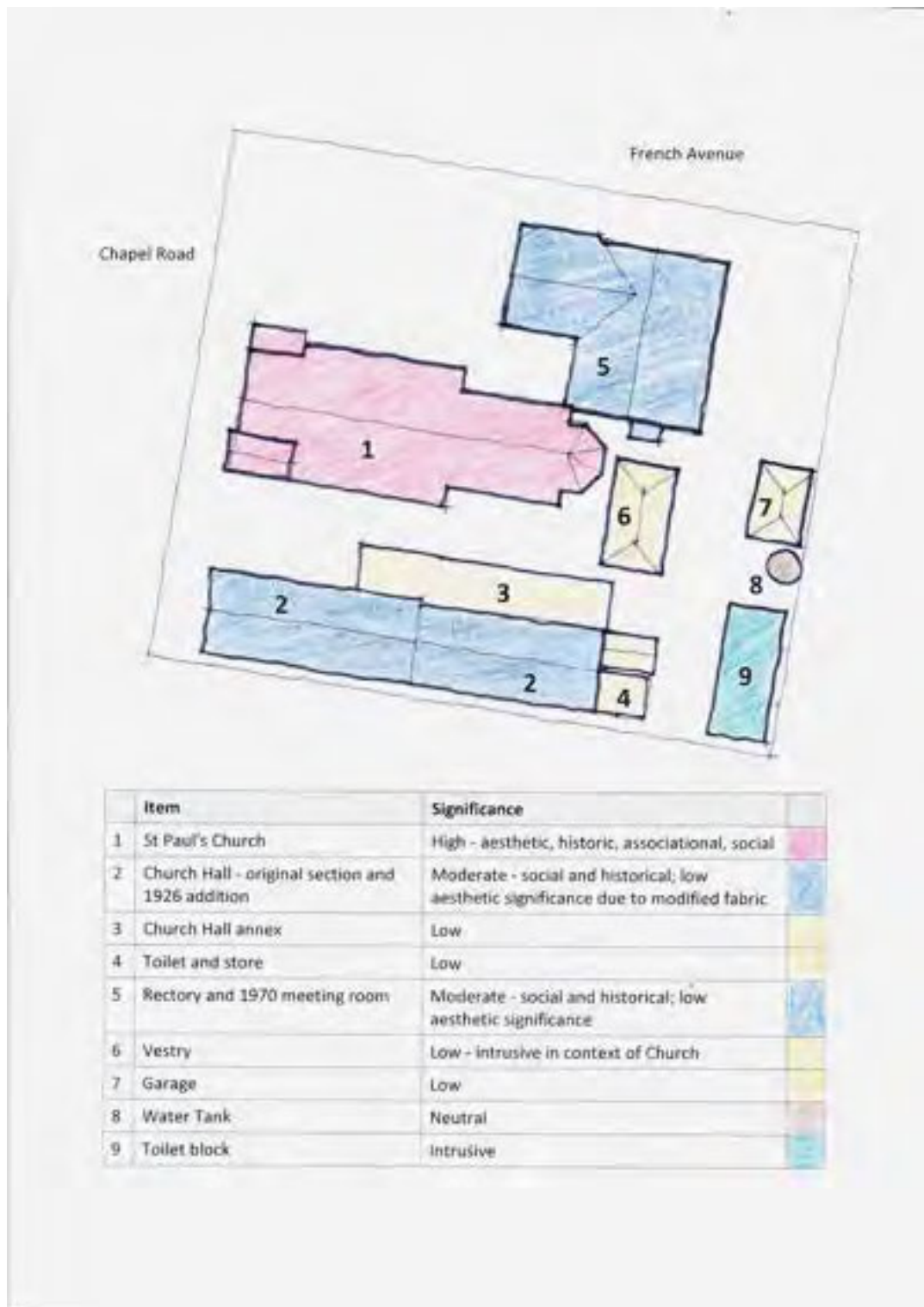
St Paul's Church is representative of the simplified medieval forms of architecture such as the Gothic and Romanesque styles that were considered appropriate for the architecture of churches during the inter-war era. The early 1960s additions are representative of the very simplified forms of post war ecclesiastical architecture, which alluded to medieval architecture

The group of buildings is representative of suburban parishes associated with Christian denominations, both in terms of historical development and in the composition of the group - church, hall, vestry and rectory.

***Statement of Significance***

The precinct of St Paul's is locally historically significant due to its capacity to demonstrate the historic themes of "Towns, suburbs and villages", "Creative endeavour", "Religion" and "Birth and Death". It has local historic associative significance due to its association with both prominent and less prominent Bankstownians with that association documented on the walls, in the windows and the furniture and fittings of the church. Its very existence is the product of local endeavour, fundraising and support for the church and parish – a testament to its local social significance for the community across the century, as currently evidenced by those who have reacted to the threat of its loss. It has local aesthetic significance due not only to its landmark status near the civic centre but as an example of the work of N.W. McPherson. It is of technical and research significance as an example of Church architecture with an unusual connection of the rectory with the church, and as a reflection of the changing aspirations of the community. This feature also lends the building local significance under the rarity criteria, rarity is also augmented by the survival of the entire complex from its inception as a parish in the second decade of the twentieth century. The Church with its activities and functions embodied in the complex also has local representative significance.

## 6. GRADING OF SIGNIFICANCE





11 April 2016

The General Manager  
Bankstown Council  
PO Box 8  
Bankstown NSW 1885



Attn: Amita Maharjan, Strategic Planner

## **OBJECTION TO HERITAGE LISTING ST PAUL'S ANGLICAN CHURCH GROUP 459 CHAPEL STREET, BANKSTOWN**

On behalf of St Paul's Anglican Church, Bankstown, we have reviewed the Supplementary Report, dated February 2016, prepared by Sue Rosen and Roy Lumby, for the St Paul's Anglican Church site in Chapel Street, Bankstown.

The Supplementary Report, still fails to make a convincing or comprehensive case for the heritage listing of the site at 459 Chapel Street, Bankstown, on the Bankstown LEP or for the imposition of an Interim Heritage Order.

The principal deficiencies with the Report are as follows:

It includes the 1938 architectural sketch (Fig 3) of the original comprehensive development concept prepared by the architect Norman McPherson and subsequently discusses the fact that the original master plan was never implemented. Only the rear half of the church building was ever erected. However it then fails to ascribe any architectural or planning inadequacies in the extant complex of buildings on the site as a result of the failure to complete the project. There is no doubt that if the project had been completed as originally envisaged, the resulting complex would now qualify for LEP listing on the grounds of its aesthetic distinction and rarity in the Sydney Metropolitan area. In its current form, the uncompleted project fails on these criteria.

It provides a list of the completed churches by McPherson, many of which are fine examples of Interwar and to some extent post War ecclesiastical architecture. Within this collection of completed church buildings, the uncompleted original section remain as a very inadequate and not readily discernible example of his architectural work. There is no justification for listing on the basis that the architect produced a body of high quality work elsewhere in NSW.

The report admits that the architect for the subsequent development of the Church and for the remaining buildings on the site cannot be identified. However, it confidently assumes on the basis they might be, to conclude that the 1961 additions to the Church display McPherson's architectural skills and flexibility in adopting a contemporary architectural language for the completion of the building, its facade and tower. To adopt this assumption and attempt to build a major case for heritage listing, weakens the overall conclusions reached by the authors. The weakness of their conclusions is demonstrated by their own statements that the 1938 section of the Church was "characteristic" of McPherson's work, while the 1961 component was only "representative".

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Nominated Architect  
Graham Leslie Brooks  
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The authors further attempt to raise the awkward combination of pre and post-war architectural styles to a new height, as demonstrated in the Conclusion on page 44 that "The church has an added level of distinction because of its two different architectural expressions, which are however linked by use of materials, scale and simple detailing to form a unified and successful whole". This conclusion cannot be sustained or supported. Each section of the church has adopted such a distinctly different architectural expression that the two do not sit comfortably or successfully together, despite consistent use of materials. They do not form a successful final composition.

Equally, there is no case to claim a specific significance in the fact that whoever designed the 1961 additions to the 1938 Church, whether or not it was McPherson, adopted a contemporary architectural expression. This is a mainstream fact of architecture, especially when there had been such a time lapse and a veritable earthquake in architectural design thinking after the Second World War.

The report continues to place great but utterly mistaken weight on the extremely awkward junction between the 1938 section of the Church and the post war Rectory. It claims that the junction reflects the compositional intent of the original McPherson master plan. This claim is ridiculous. The composition of the two buildings and junction reflects a very low or totally absent level of architectural design competence. It is not a continuation of the original concept. It simply reflects an unskilled attempt to fit the new Rectory building onto the adjoining area of the site, while keeping as much of the rear of the site clear for future development. The Church and the Rectory do not form an harmonious composition. The junction simply demeans the Church by the unsympathetic crudity of its conception and implementation.

The concluding heritage assessment does not follow the rigour demanded by the Assessment Criteria, as published by the NSW Heritage Council. Their assessment uses terms such as "capable of demonstrating" or "reflective", whereas the criteria demand that an item be an "important" example, demonstrate "strong or special" association, a "high degree" of creative achievement or possess "rare" aspects of the local cultural history. The assessment does not make a sufficient case for listing on a single one of the criteria. It describes what may be regarded as typical or common features, in terms of its historic development, associations and local esteem, of almost any place of worship in any local community in NSW or elsewhere. Such features are inherent in the nature of community based places of worship, irrespective of their religious heritage. With the subject site they cannot be regarded as special or particular. If they were, then every place of worship of every religion in every local community would be heritage listed.

Most importantly, the claim that the place is of social significance due to the strong reaction by members of the congregation to rumours of potential development threat, is specifically disallowed in the Heritage Council criteria, and has been so for many decades.

In conclusion, the supplementary report continues to ignore the important impact generated by lack of architectural integrity or aesthetic creativity in any of the extant buildings on the site and certainly on the complex as a whole, especially when considered against the original master plan. There is no valid or sustainable argument within the February report that justifies either LEP heritage listing or the imposition of an Interim Heritage Order over the property.

Yours faithfully  
GBA HERITAGE PTY LTD



Graham Brooks  
Director  
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**BANKSTOWN CITY COUNCIL**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 26 APRIL 2016**

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**ITEM 5.3                    ST PAUL'S ANGLICAN CHURCH - INTERIM HERITAGE ORDER**

MR TERRY LIDGARD (ON BEHALF OF ST PAUL'S ANGLICAN CHURCH  
ADDRESSED COUNCIL).

**MOTION                    CLR. WINTERBOTTOM:/CLR. WAUD**

That –

1. Council delegate authority to the General Manager to prepare and submit a planning proposal to the Department of Planning & Environment to list the St Paul's Anglican Church site at No. 459 Chapel Road in Bankstown as a heritage item in Bankstown Local Environmental Plan 2015.
2. Council seek authority from the Department of Planning & Environment to exercise the delegation of the Minister for Planning regarding the plan making functions under section 59 of the Environmental Planning & Assessment Act 1979.
3. Subject to approval from the Department of Planning & Environment, Council exhibit the planning proposal to provide further community comment, and the matter be reported to Council following the exhibition.

- LOST

**For:-**                    Clrs Kuskoff, Waud, Winterbottom, Golledge and Nguyen

**Against:-**            Clrs Downey, Najjar, Stromborg, Daniel and Parker

**THE DEPUTY MAYOR CLR NGUYEN EXERCISED HIS CASTING  
VOTE AND VOTED AGAINST THE MOTION.**

**THE MOTION WAS DECLARED LOST.**

**STANDING ORDERS WERE RESUMED.**

**ITEM 5.2                    101 AND 111 REX ROAD, GEORGES HALL**

**CONSTRUCTION OF AN AGED CARE FACILITY COMPRISING  
TWENTY-FIVE (25) X TWO (2) BEDROOM (WITH STUDY)  
INDEPENDENT LIVING UNITS AND A COMMUNITY CENTRE WITH  
BASEMENT CAR PARKING FOR TWENTY EIGHT (28) VEHICLES**



# **AGENDA FOR THE CANTERBURY BANKSTOWN LOCAL PLANNING PANEL MEETING**

**09 and 10 September 2021 - 6.00pm**



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## **ORDER OF BUSINESS**

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### **ORDER OF BUSINESS**

### **APOLOGIES AND DECLARATIONS**

### **CONFIRMATION OF MINUTES OF PREVIOUS MEETING**

### **BANKSTOWN WARD**

- |          |  |          |
|----------|--|----------|
| <b>1</b> | <b>Bankstown City Centre Planning Proposal</b> | <b>3</b> |
|----------|--|----------|

### **CANTERBURY WARD**

- |          |  |           |
|----------|--|-----------|
| <b>2</b> | <b>Campsie Town Centre Planning Proposal</b> | <b>29</b> |
|----------|--|-----------|

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## Canterbury Bankstown Local Planning Panel – 09 and 10 September 2021

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<b>ITEM 1</b>	<b>Bankstown City Centre Planning Proposal</b>
<b>APPLICANT</b>	<b>Council initiated Planning Proposal</b>
<b>OWNERS</b>	<b>Various</b>
<b>AUTHOR</b>	<b>Planning</b>

### **PURPOSE AND BACKGROUND**

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The purpose of this report is to seek the Local Planning Panel's advice on proposed changes to the Canterbury Bankstown LEP (CBLEP). The proposed changes will be presented shortly to Council and supported by a Statement of Objectives and Intended Outcomes. These proposed changes have been established through the preparation of a detailed Master Plan for the Bankstown City Centre.

The draft Bankstown City Centre Master Plan (the draft Plan) sets the strategic planning basis and supports a series of amendments to planning controls aimed at facilitating jobs, housing, design, sustainability and movement aspirations initially established by Council's Local Strategic Planning Statement, Connective City 2036. The draft Plan is the first stage of a suite of place-based master plans for the City, which will be incrementally implemented by Council (subject to its approval).

This report presents the draft Plan, Statement of Intended Outcomes of the Planning Proposal, report on the outcomes of early engagement undertaken by Council and associated background to the Panel for its information in considering the proposed changes to the CBLEP.

Bankstown City Centre is expected to evolve into a regional, jobs focused, health, academic, research and training precinct. The draft Plan seeks to leverage the significant investment being made in the transport, health, education, retail and entertainment sectors, to facilitate 25,000 jobs, 25,000 students and an additional 12,500 dwellings in the centre by 2036. The draft Plan provides a framework to inform the delivery of infrastructure, improvements to the design and sustainability of buildings, public domain improvements, the delivery of affordable housing, increased capacity for jobs, housing and community facilities and an approach to the management of heritage and character.

Council undertook early community engagement and sought feedback on the draft Plan as part of ongoing engagement that has occurred since July 2020. The period for the community to provide feedback on the draft plans was from 29 March to 14 May. Written comments received until 11 June have also been considered. Council wrote to approximately 9,300 owners and occupiers of residential and commercial properties to inform them of the draft Plan and the ongoing community engagement process. During this time, 31 community members provided written feedback relating to the draft Plan, and 66 provided written

feedback that referred to draft Plans for both Bankstown and Campsie, as both Plans were prepared concurrently. Of the 97 comments received in writing, 95 were written in support, or support with conditions and 2 objected to the draft Plan.

It is intended that Council will consider whether to prepare and submit a Planning Proposal for the Bankstown City Centre. The advice of the LPP in this respect will assist Council in considering the matter. It is also the role of Council to consider whether to endorse the draft Plan.

## ISSUE

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Having regard to the comments and feedback made during the early engagement process from the community, the draft Plan has been revised to reflect a number of changes. It is intended that the Master Plan (if adopted) forms the basis of amendments to the planning controls for the Bankstown City Centre, which will include amendments to CBLEP (pending its gazettal).

## RECOMMENDATION That -

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1. The Local Planning Panel reviews the draft Bankstown City Centre Master Plan and provides advice on proposed changes to the Canterbury Bankstown Local Environmental Plan 2021 as outlined in this report.
2. Council prepares and submits a Planning Proposal to amend the draft Canterbury Bankstown Local Environmental Plan 2021 for Gateway that implements the Bankstown City Centre Master Plan, subject to:
  - (a) Preparation of draft LEP Amendment maps to include with the Planning Proposal;
  - (b) Completion of the following studies prior to submission for Gateway:
    - i. Independent Flood Review, to confirm consistency with Section 9.1 Direction 4.3 – Flooding;
    - ii. Preliminary Contamination Assessment, to confirm consistency with Section 9.1 Direction 2.6 – Remediation of Contaminated Land.

Council prepares a Development Control Plan to implement the Master Plan that is exhibited concurrently with the Planning Proposal.

## ATTACHMENTS Click here for: [Attach A](#), [Attach B and C](#) [Attach D](#), [Attach E](#)

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- A. Draft Bankstown City Centre Master Plan (August 2021)
- B. Early Engagement Outcomes Report
- C. Planning Proposal Assessment Findings
- D. Technical Studies and Analysis
- E. Current and Proposed Land Acquisition Map

## POLICY IMPACT

This draft Plan begins to implement Council's strategic planning established under the Canterbury Bankstown Local Strategic Planning Statement, *Connective City 2036*, the Community Strategic Plan, CBCity 2028, and Council's Housing, Employment Lands and Affordable Housing Strategies.

If adopted by Council, the draft Plan will become a policy of Council, and form the basis of the Planning Proposal to amend the CBLEP (pending its gazettal). In addition, it will form the basis of changes to Council's consolidated Development Control Plan in relation to future development within the Bankstown City Centre and a consolidated Contributions Plan for the City.

Changes to Council policies, including the Local Environmental Plan, Development Control Plan, Contributions Plan and other plans or policy changes arising from the planning proposal progressing, will be required to be reported to Council separately for implementation.

The draft Plan itself will not result in any changes to current planning controls. It is requested that the Local Planning Panel provide advice to Council to inform its decision in deciding whether to proceed with the preparation and submission of a Planning Proposal, which is the formal commencement of the process to amend planning controls.

The Master Plans in the context of the broader planning policy framework is illustrated below.

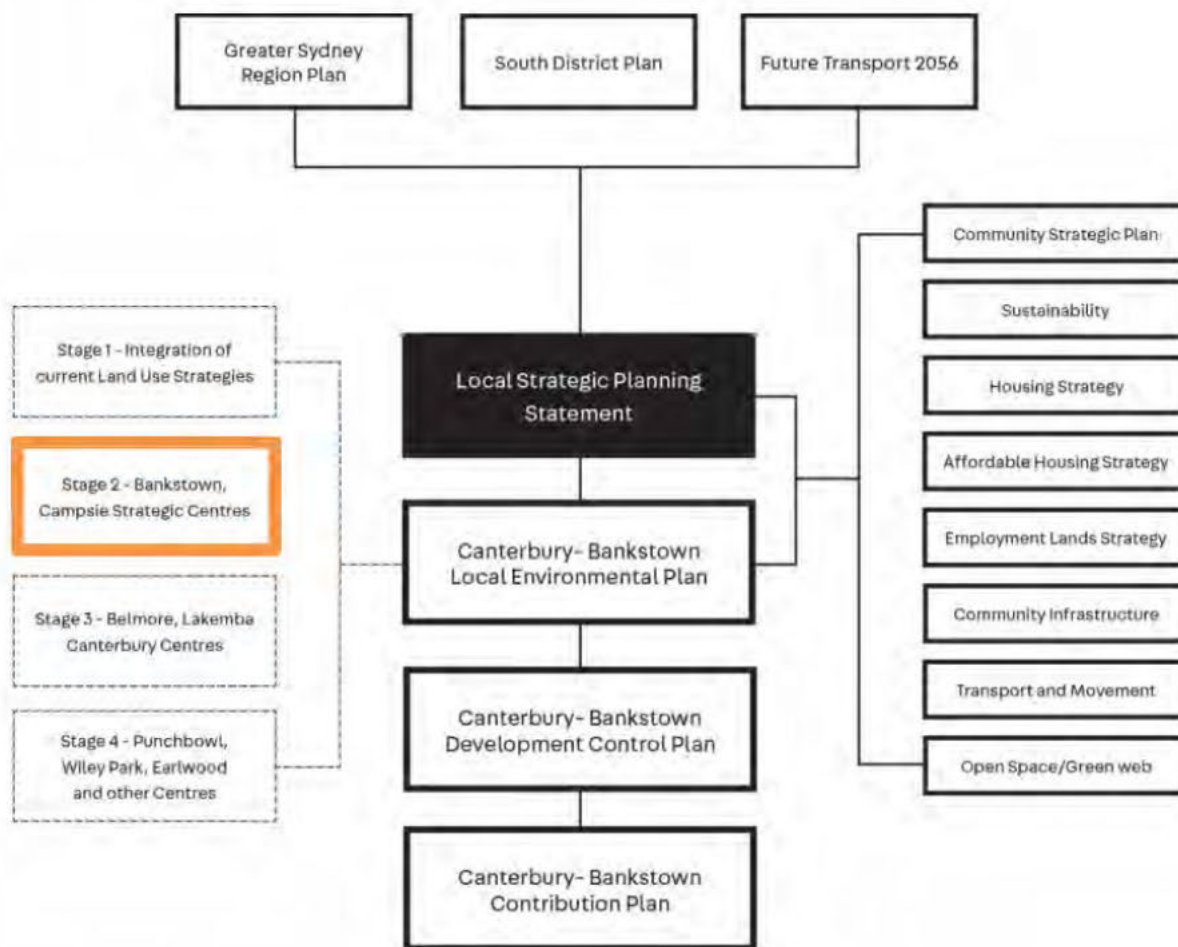


Figure 1. Planning Policy Framework



## **FINANCIAL IMPACT**

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The draft Plan has been primarily funded by Council, with some funding also provided by the NSW Department of Planning, Infrastructure and Environment.

If adopted, the draft Plan will inform Council's investment in infrastructure from a range of sources including Section 7.11 and 7.12 contributions, property and asset renewal, works in kind, further master planning for Council assets such as the West Terrace Car Park and informing capital work programs. It is noted that any change to Council's contributions plan, capital works program and future plans for the Bankstown City Centre, will require future reports to Council and will individually seek endorsement under separate cover.

## **COMMUNITY IMPACT**

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The draft Plan will guide planning controls for development across this centre. It provides transparency for the existing community and certainty to industry with respect to the planned growth and change envisaged for Bankstown over the next 15 years.

The draft Plan has been amended to incorporate a number of changes following early feedback received from the community and stakeholders. The draft Plan provides the community, industry and government with confidence and certainty in ensuring managed growth and change in the Bankstown City Centre, with a clear vision and expectations for high standards of design and sustainability.

Building on the ongoing engagement with the community since July 2020, community feedback was sought on the draft Plan between 29 March and 14 May 2021, with submissions received until 11 June also assessed and considered. Council wrote to 10,961 owners and occupants of commercial and residential properties to inform them of ongoing community engagement regarding the draft Plan. During this period, a total of 97 submissions were received, 31 of which related to Bankstown only, and an additional 66 submissions which related to both the draft Bankstown and Campsie Master Plans, which were concurrently released for feedback. Of the 97 comments received in writing, 95 were written in support, or support with conditions and 2 objected to the draft Plan. During this time, Council also undertook the following activities to maximise the community's awareness and engagement with the process:

- Online community survey
- Interactive map for feedback
- Availability of planning staff to directly liaise with the community through 'speak to an expert' service
- 4 x pop-up sessions
- Community webinar
- Government agency briefing
- Social media posts
- Dedicated 'Have Your Say' Page
- Planning Proposal Applicant engagement, supported by Probity Advisor
- Mail-out to all households in the master plan study area (10,961 letters sent).

Should the draft Plan be adopted and endorsed to proceed to Gateway, a Planning Proposal process will commence. If the NSW Department of Planning, Infrastructure and Environment issues Gateway approval for the Planning Proposal, Council will undertake a formal exhibition process in accordance with the conditions of Gateway. Formal exhibition will be for a minimum period of 28 days.

## DETAILED INFORMATION

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### INTRODUCTION

Bankstown City Centre is the largest strategic centre in the Canterbury Bankstown Local Government Area, and its primary centre for health, education, commercial, retail and entertainment activity. Investment by the State Government in delivering Sydney Metro services to Bankstown, will place the centre within 30 minutes by Metro to Central Sydney and beyond to a number of key strategic job centres. Government and institutional investment in the centre will also see significant growth in education and health infrastructure, retail and entertainment uses. The draft Plan establishes the framework for Bankstown's evolution into a genuine, jobs-focused, destination centre that contributes to our city's prosperity, innovation and attractiveness.

The draft Plan has been developed through ongoing community engagement to implement the vision and actions of *Connective City 2036*, Council's Local Strategic Planning Statement, along with Council's Housing, Employment Lands and Affordable Housing Strategies.

The draft Plan has been informed by thorough critical analyses, including specialist technical inputs relating to urban design, transport, land use economics, indigenous culture and heritage, sustainability, heritage and infrastructure planning.

The Master Planning process and current status is illustrated below:

Status	Stage
✓	Technical and preliminary analyses
✓	Early targeted engagement
✓	Preparation of draft Plan
✓	Report to Council noting the preparation of the draft Plan
✓	Broad community feedback on the draft Plan
<b>We are here</b>	<b>Report to Local Planning Panel for advice</b>
To be confirmed following LPP meeting	Report to Council for consideration to adopt draft Plan and prepare and submit a Planning Proposal
To be confirmed, pending endorsement of Council	Commence Planning Proposal process

### THE DRAFT PLAN - OVERVIEW

The draft Plan is underpinned by a long-term strategic vision. This vision has then been translated through a series of "spatial moves" and "intensification" approaches, which have been used to guide the 10 Directions, outlined in detail below.

#### *The Vision*

The Vision for the Bankstown City Centre is:

*"Bankstown City Centre is the beating heart of Canterbury Bankstown and a destination for Greater Sydney."*

*Walkable streets are framed by beautiful parks and great architecture. The city embraces environmentally sustainable living.*

*Anchored by a prominent university, health institutions and a world-class metro, Bankstown is a leading centre for innovative jobs, housing choice and green transport.*

*People are drawn to the City for its delicious food and vibrant art, culture, entertainment and nightlife.”*

## **10 Directions**

The draft Plan is underpinned by **10 directions**, outlined below:

1. A centre stimulated and supported by infrastructure
2. A centre for people
3. A centre that attracts investment and jobs
4. A well-designed centre
5. A centre that embraces nature
6. The heart of Connective City
7. A resilient and carbon neutral centre by 2050
8. A centre proud of its heritage and culture
9. A centre with housing for all
10. A centre with collaborative governance

These 10 directions ensure the approach to growth and change is holistic and considers the broader needs and aspirations of the city – from ensuring infrastructure aligns with growth, to building a strong night-time economy and ensuring adequate housing that is well designed and sustainable.

## **Key moves**

The draft Plan proposes a series of key moves, which are proposed changes in policy and direction. These include:

- Incentive-based height and floor space system – where sites are proposed to receive uplift (generally of more than 1:1) above current controls, the uplift is intended to be subject to the provision of on-site infrastructure, affordable housing and/or employment-generating floor space – *Feedback received during engagement with the community did not raise issues with respect to this key move.*
- Infrastructure funding, delivery and advocacy strategy – a clear strategy for the development of infrastructure in Bankstown is established, utilising a combination of Section 7.11 and 7.12 contributions, property renewal and capital works investment – *Feedback received during engagement with the community emphasised the need to ensure growth is supported by infrastructure (refer to key issues discussion below).*
- Affordable housing delivery – *Feedback received during engagement with the community was generally supportive of the provision of affordable housing. Some feedback noted the rate of 3% should be higher, however, as clarified in the draft Plan, it is noted that this applies to the whole of development, whilst targets set by the State Government of 5-10% only apply to floor space uplift, which would yield less affordable housing than is proposed by the draft Plan.*



- Sustainability initiatives – *Feedback received during engagement with the community strongly supported these initiatives.*
- Changes to parking requirements for new developments – *Little feedback received during engagement with the community raised issues with respect to this key move. Most submissions referred to traffic congestion or public parking, but did not raise concern with the changes proposed to private parking.*
- Recommended changes in height and density – *Significant feedback was received, primarily site specific, with respect to height and density. These submissions were carefully assessed and tested in the development of the draft Plan.*

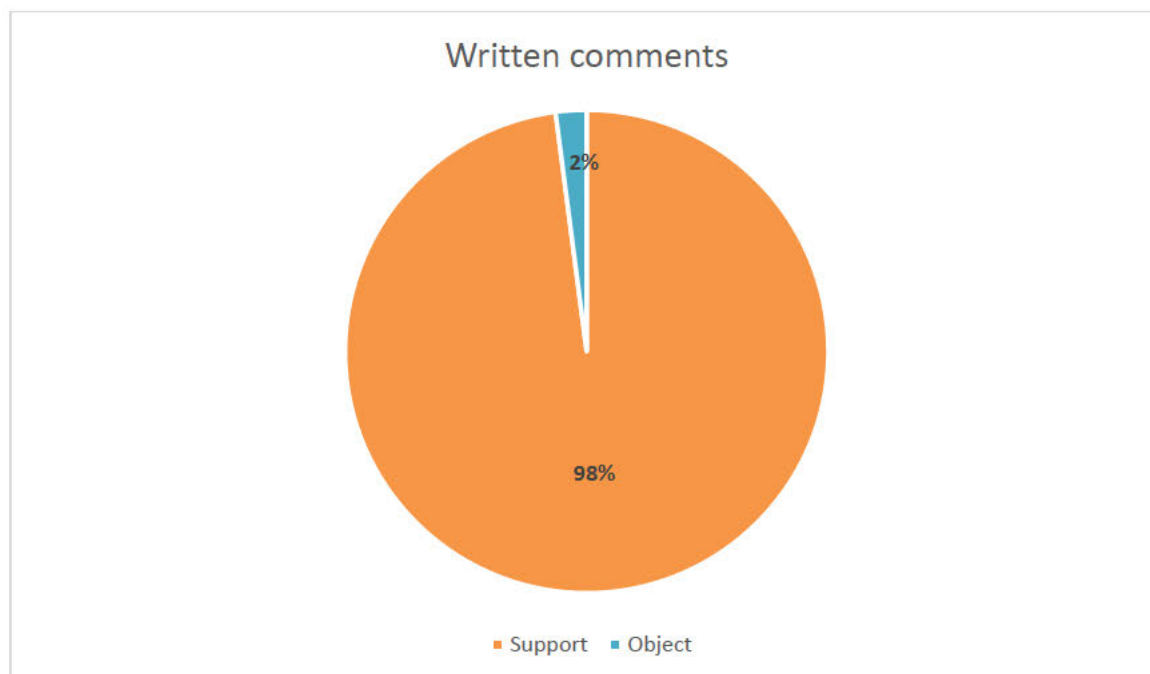
## ENGAGEMENT ACTIVITY

A summary of engagement activities and responses are set out in the table below.

Engagement/promotional activities	Bankstown Master Plan	Combined (submissions that relate to both Bankstown and Campsie)
Direct mail to landowners and occupants	10,961	-
Community Survey responses	22	-
Interactive map comments	13	-
'Speak to an expert' calls	19	-
Direct written submissions	31	66
Petitions	-	1 x 229 signatures (supporting sustainability initiatives)  1 x 12 signatures (supporting sustainability initiatives)
Pop-up conversations/flyer hand-outs	723	-
Community Voice Panel attendees	5	-
Community Webinar Views	44	-
Agency/institutional briefing attendees	-	110
Industry Forum	-	10
Social media clicks to view draft Plan documents	485	-
Direct Have Your Say Page Views/Document Downloads of the draft Plan and associated technical studies	3,604	-
<b>Total</b>	<b>15,906</b>	<b>427</b>

The graph below gives an indication of the level of support and objection to the plans. In summary:

- 98% of submissions either supported the draft Plan, some entirely, and others with suggestions for improvement or change; and
- 2% objected to the draft Plan.



The top five issues raised in feedback from the community are detailed below:

1. **Support for sustainability initiatives** – there was significant support from the community for the forward-thinking and innovative approach to sustainability. The draft Plan outlines a plan to improve baseline sustainability in development, along with providing further incentives for development that achieves excellence in sustainability. This includes initiatives such as encouraging all-electric buildings, solar electricity generation, electric-vehicle charging and exceeding standards for energy and water efficiency and thermal comfort. These initiatives are maintained in the draft Plan.
2. **Concerns for increased traffic congestion** – The jobs, housing and student growth forecast in the draft Plan will result in a substantial increase in people visiting, working and residing in the City Centre. The draft Plan builds on the *Bankstown Complete Streets CBD Transport and Place Plan*, and includes a number of further measures to mitigate against the potential increase in traffic in the City Centre. The Infrastructure Strategy includes funding for these works where they are the responsibility of Council to deliver. These measures include:
  - Moving Council owned parking stations to the edges of the City Centre, to reduce the amount of cars that are required to drive into the centre itself.
  - Reducing the amount of parking that is required for developments within the City Centre, reducing traffic generated by development and influencing modal shift.
  - Improving active transport infrastructure to make walking and cycling easier, more attractive options for travelling to and through the City Centre.
  - Enhancing the ring road network, to encourage cars to circulate around the edge of the City Centre on key roads, rather than driving through the City Centre.

- Advocate to and work with Transport for NSW on the delivery of the Stacey Street and Hume Highway Grade Separation project.
- Advocate to and work with Transport for NSW on enhancing the bus network through Bankstown and ensuring this is a viable and attractive option for people travelling to the City Centre from the surrounding area.

It is noted that at the last census (2016), approximately 30% of residents in the Bankstown City Centre used public or active transport to get to work, an increase since 2011, whilst 15% of households who live in the City Centre have no car. The draft Plan aims to contribute to increasing both public transport trips and households that do not need to rely on car transport.

3. **Need for more community infrastructure** – a number of people noted that Bankstown currently lacks community infrastructure such as playgrounds, public toilets, community centres, and that growth is likely to further impact on the adequacy of infrastructure to meet current and future demand. A few people also made reference to State infrastructure such as schools and hospitals. Council has consistently called for a coordinated growth and infrastructure strategy that ensures current and future infrastructure needs are appropriately planned for, funded and delivered. The draft Plan is supported by an infrastructure strategy which sets out a plan for funding, delivery and advocacy of infrastructure, including:
  - a. Recommendations to inform a consolidated city-wide Contributions Plan which includes the funding of local infrastructure, such as enhanced and new open spaces and enhanced and new community facilities.
  - b. Proposed renewal of Council's assets around West Terrace Car Park to deliver new public space.
  - c. Working with the private sector such as schools and non-profit organisations to deliver enhanced indoor recreational facilities, multi-purpose facilities and outdoor open space.
  - d. Advocacy to the NSW State Government for upgrades to local schools, a city-centre based public hospital.
  - e. Improvements to Bankstown Library and Bankstown Arts Centre.
  - f. New public open spaces at West Terrace Car Park, adjacent to Griffiths Park, Bankstown Central site and investment in existing parks such as RM Campbell Reserve, Stevens Reserve, Memorial Oval parklands and Salt Pan Creek.

The draft Plan, sets a clear plan for growth that provides clarity to the community, Council and the State Government on the growth forecast for Bankstown, and allows agencies to plan for this.

A clear example of this is in relation to the Department of Education and its forecasts for Bankstown which it had forward planned for in relation to growth and expenditure in assets. Through this process it was identified that growth for significantly less students was being planned for in and around the Bankstown City Centre. Through this draft Plan, Council was able to provide the Department with more accurate forecasts for growth and this data will now being used to inform their forward planning and budget allocations in Bankstown.

4. **More public parking** – A number of comments from the community stated that more public parking is needed in Bankstown. As mentioned above, the draft Plan seeks to implement the *Bankstown Complete Streets CBD Transport and Place Plan* with respect to public parking. While the plan acknowledges the current quantity of public parking is sufficient for the centre, Council will be seeking to re-locate and consolidate public parking to the edge of the City Centre along the ring road network to avoid vehicles for having to enter the core of the centre to find parking short-term parking. This will improve accessibility whilst maintaining a pedestrian friendly inner core. The draft Plan advocates for the development of commuter parking close to Bankstown Station by Transport for NSW. The draft Plan also seeks to enhance walking, cycling and public transport access into Bankstown from surrounding areas, in order to make these trips more seamless and attractive, and therefore reduce the need for residents to use cars to access the City Centre.
5. **Site specific submissions** – A number of landowners made site specific submissions, generally seeking an uplift in density that what has been prescribed in the draft Plan. These submissions were considered on a case-by-case basis, in the context of the intensification strategy and desired future character of each precinct within the draft Plan study area.

## REVISIONS TO THE DRAFT PLAN

Following a review of the community's feedback and further analysis, a number of amendments have been made to the draft Plan. The key changes are summarised below:

1. **Commuter Parking:** A number of submissions raised the need for commuter parking in Bankstown, particularly as the provision of Sydney Metro services may attract additional commuters to the centre including from suburbs west of Bankstown with no rail access. In response, the draft Plan advocates for the development of commuter car park facilities on State Government land close to the Metro. The Infrastructure Map identifies the opportunity for this to be located immediately south of the Metro Station.
2. **Underground floor space:** On analysis of a number of site-specific submissions as well as a precedent study of other locations in Sydney, the use of underground floor space for a limited number of retail and community uses will be investigated through the Planning Proposal process. This has the ability to facilitate larger uses such as supermarkets, parts of registered clubs and community facilities, to be located underground, facilitating improved street activation by reducing large format uses at street level, and allow for greater ground floor permeability. This is a new initiative that is being tested to ensure public spaces and accessibility are not compromised but will work in concert. This would also assist in achieving the jobs target for Bankstown. Refer to *Objective 1.3* and *Action 1.3.4*. Refer to proposed LEP provision further in this report.
3. **Intensification Strategy:** In response to comments from the community, the intensification has been revised to note that the block identified as 'A' at Figure 2 below, is no longer proposed for intensification. This block was further analysed, and determined to be appropriate for medium density housing typologies. Two relatively recent developments of terrace-style multi-dwelling housing have been developed to the north of this block. These types of developments can continue under current controls, and contribute to the housing diversity available close to the Bankstown City Centre.



This change has also been appropriately reflected on other maps throughout the draft Plan, identifying this block as an area of 'no change'.

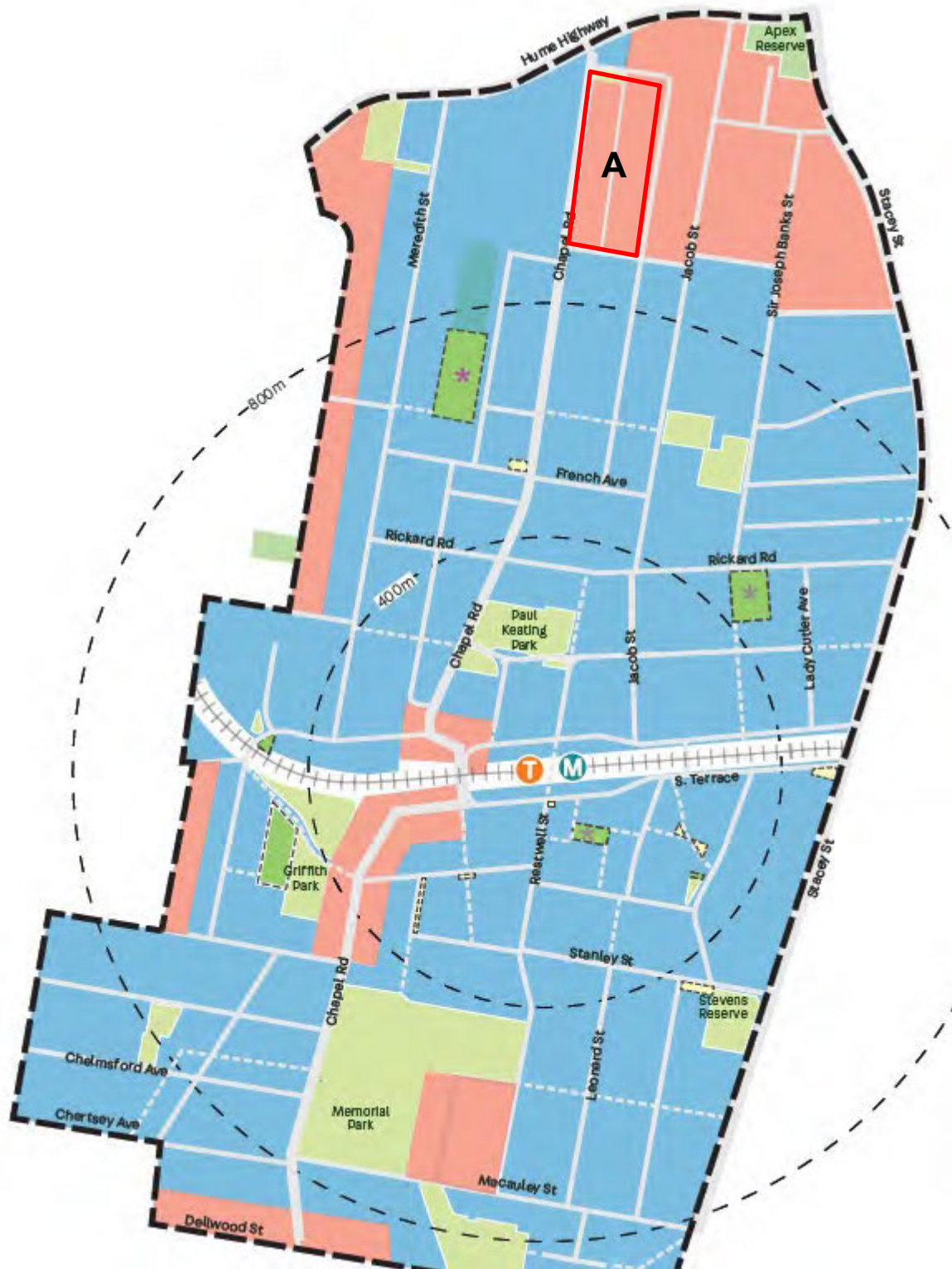


Figure 2. Intensification Strategy Revisions

4. **Clarification of employment-generating uses:** A number of sites around the future Metro Station have been identified as sites that will require a minimum 50% employment generating uses. Further analysis of the uses specified as 'employment-generating uses' was undertaken, with the list amended to include 'residential aged-care facilities' as these uses operate with high staff requirements, particularly in the health sector, and are considered complimentary to the 'health and education' role of Bankstown.
5. **Maximum building height:** In response to a number of submissions regarding renewal opportunities, transitions between adjacent buildings and further analysis, the following key building height changes are proposed. It is noted that the height includes incentive height, which for some sites will require the provision of on-site infrastructure, affordable housing or employment generating uses. The key changes are listed below and illustrated at Figure 3:
  - a. **Area A** – This site has been increased in height from 8 to 10 storeys, given the potential for site amalgamation to facilitate increased development potential that provides an improved transition between the core of the City Centre to the south, and 8 storey residential development to the north.
  - b. **Area B** – The draft Plan previously identified that further testing would be required in the area along Rickard Road, pending further analysis on the most appropriate location for a park on the Bankstown Central site, and ensuring the park is able to achieve at least 4 hours of sun access to 50% of the park in mid-winter. Analysis of the location of the park to maximise sun access, review of submissions for landowners around this park, and detailed solar access modelling has been undertaken to determine the proposed maximum building heights in this location. The building heights have been amended to range between 14 and 18 storeys (previously 10 to 15 storeys).
  - c. **Area C** – This change refers to 85 Bankstown City Plaza. This site was reviewed given it is an anomaly amongst the fine grain, small lot subdivision patterns in this area. This block is large, and deep, with secondary access to Depot Place at the rear. Following testing of this site, the recommended maximum height has been increased from 4 to 6 storeys. It is noted that this site is located in the proposed commercial core.
  - d. **Area D** – These areas have been reconsidered due to a number of submissions and more detailed built form testing. A number of submissions identified the potential for minor increases in density to encourage amalgamation in these areas, which are largely characterised by smaller, low density lots. Detailed 3D built form testing was undertaken to test capability of these areas to achieve a marginal increase in density (1 or 2 storeys above the draft Plan recommendations), whilst ensuring the sites could achieve solar access, landscaping and deep soil controls set out in SEPP 65 and the Apartment Design Guide. One site, being the 13 storey site along Restwell Street, has been reduced in height, with the height reflecting an existing, recently developed apartment building. The remainder of these areas have been increased in height by 1 or 2 storeys.

- e. **Area E** – These three sites represent identified ‘gateway sites’. Feedback was provided that the height on these sites was out of character with their surrounds, and that the height was not appropriate to their proximity to the station and core, particularly with respect to the site at the Hume Highway/Chapel Road intersection and the Stacey Street/Macauley Avenue intersection. These sites have been re-modelled to test a more contextually appropriate built form outcome. The height on each of these sites has been reduced by at least 3-4 storeys.
- f. **Area F** – This area south of Macauley Avenue was identified for four storey, low rise apartment buildings. However, further analysis of the built form in this location demonstrated the potential for these sites to be increased in height to maximise the amenity and outlook provided by the Salt Pan Creek Corridor Parklands. These parklands provide a generous green spine and active transport corridor into the City Centre core. An increase in height in this location from 4 to 6 storeys is consistent with the intensification strategy objectives of locating density near amenity.

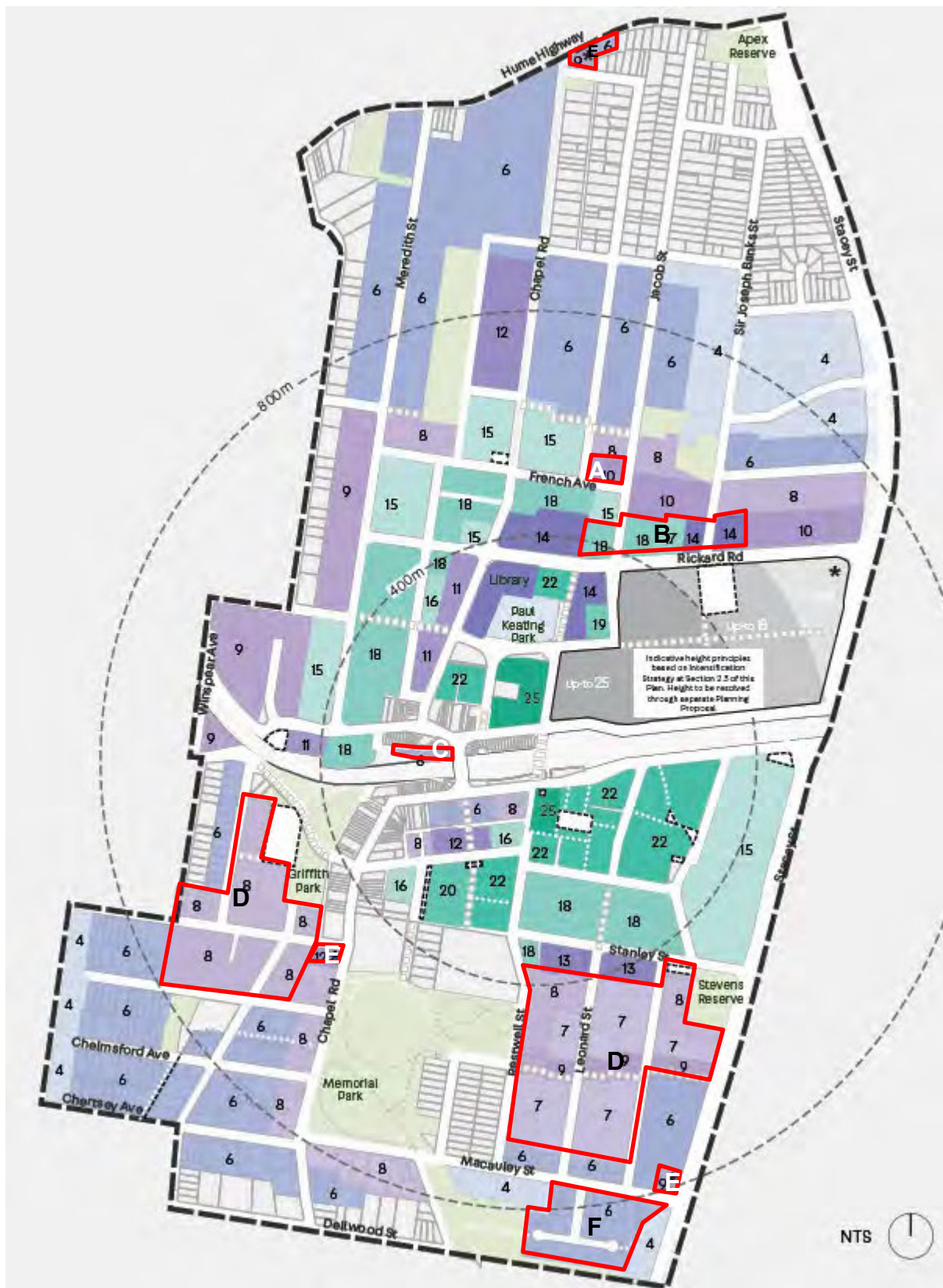


Figure 3. Building Height Map with changes



6. **Sustainability bonus:** A sustainability bonus is already in place for some development in the Bankstown City Centre. The bonus scheme was independently reviewed through the Master Planning process. The review recommended a number of changes to better support achieving Council's net zero emissions target by 2050. One of the recommended changes was to broaden the application of the bonus across the City Centre, rather than only to limited, large scale developments. The previous iteration of the draft Plan recommended a bonus of 0.5:1 be applied across the City Centre. This has been retained.

It is however proposed that the sustainability bonus be amended in terms of the quantum of bonus floor space that can be achieved. Given it is proposed to apply the sustainability bonus more broadly, a 0.5:1 FSR bonus for development achieving less than 1.5:1 is a substantial uplift that will result in poor built form outcomes. As such, for development with a proposed maximum FSR of less than 1.5:1, it is proposed that the Sustainability Bonus be reduced to 0.25:1 FSR.

7. **Bicycle parking:** Upon finalisation of the independent Parking and Loading Study, further recommendations on bicycle parking have been developed. The draft Plan has been revised to recommend the introduction of mandatory bicycle parking controls for the Bankstown City Centre as part of future DCP amendments.
8. **Floor Space Ratio –** The draft Plan previously provided an indicative 'FSR range' for the various building height zones recommended. Since March 2021, Council has undertaken more detailed floor space ratio testing to determine the most appropriate maximum floor space ratio for each site. The recommended maximum floor space ratio includes the sustainability bonus and incentive floor space for delivery of affordable housing, on-site infrastructure or employment-generating floor space. In the Planning Proposal, a separate 'Incentive Floor Space Ratio Map' will be prepared, to show sites that are required to provide the above in order to achieve the uplift on the Map. For other sites, receiving only a marginal uplift, the current maximum Floor Space Ratio Map will be amended.

The proposed floor space ratio is based on built form testing and consideration of submissions.

The proposed floor space ratio for the Compass Centre block is also proposed to be increased, due to the proposed change in land-use for the block, which the draft Plan recommends to be a minimum 50% for employment-generating uses. The increased maximum floor space ratio of 5.8:1 retains the same indicative built form that is envisaged under the current controls, however recognises that the increase in commercial floor space required under the draft Plan results in increased gross floor area when compared to equivalent residential built form. The proposed change in floor space is not expected to result in an increase in the number of buildings, their form or overall scale of development on the site beyond what is available under the current LEP controls.

It is noted that the floor space ratios expressed below would exclude underground floor space for supermarkets, community facilities and registered clubs (refer to Item 3 above).





## BANKSTOWN CENTRAL SHOPPING CENTRE (VICINITY) PLANNING PROPOSAL

Council is in receipt of a Planning Proposal for the Bankstown Central Shopping Centre (Vicinity) site, a significant landholding of approximately 12 hectares within the core of the City Centre. As noted in the draft Plan, it is recommended that this Planning Proposal continue to proceed independently of the draft Plan, as it requires more detailed analysis and assessment given the size and complex nature of the site. The draft Plan does however provides direction on desired future through-site links, the location of open space and the proportion of employment-generating uses on parts of the Bankstown Central site. The revised draft Plan also includes indicative height principles for the site based on the intensification strategy, noting that height of building controls and other matters will be tested and resolved separately through the planning proposal process.

### PLANNING PROPOSAL FOR IMPLEMENTATION OF THE DRAFT PLAN

#### Explanation of Intended Outcomes of the Bankstown City Centre Planning Proposal

Subject to Council's endorsement of the draft Plan, the next step in the process is to submit a Planning Proposal that will translate the vision and intended outcomes of the draft Plan into new and amended planning provisions in the CBLEP 2021. The Planning Proposal will be prepared by Council in accordance with the Department of Planning, Industry and Environment (the Department) *A Guide to Preparing Local Environmental Plans*.

Council's assessment findings of the proposed amendments to the CBLEP 2021 indicate the proposal demonstrates strong strategic and site-specific merit to proceed to the Gateway (refer to Attachment C - Assessment Findings). Subject to receiving a Gateway Determination from the Department of Planning, Industry and Environment, Council will exhibit the Planning Proposal in accordance with the Gateway conditions.

Council has progressed the finalisation of the CBLEP 2021 which has been publicly exhibited and is with the Department for finalisation. To avoid any doubt, this application seeks to amend the CBLEP 2021.

The Planning Proposal based on the draft Plans will include amendments to the draft CBLEP 2021 as detailed in the table below.

#### *Description of proposed LEP amendments – proposed provisions and intended outcomes*

Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
<b>Amended LEP Maps</b>	<p><u>Land Zoning Map</u></p> <p>Amend the Land Zoning Map as follows:</p> <ul style="list-style-type: none"><li>• Amend the zoning of the following sites from SP2 Infrastructure to other zones:<ul style="list-style-type: none"><li>○ 490 Chapel Road (Lot 1 DP 853675) and 347Aa Hume Highway (Lot 2 DP109612 (Bankstown TAFE Site): From SP2 – Educational Establishment to permit hospital and ancillary health and accommodation facility uses to meet the South District Plan, LSPS and Bankstown Place Strategy and incentivising the delivery of a public hospital within the Bankstown City Centre.</li></ul></li></ul>



Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
	<ul style="list-style-type: none"> <li>○ 40 Marion Street, Bankstown (Lot 21 DP 873506); and 27-31 Meredith Street, Bankstown (Lots 1-2 DP 302765 and Lot 27 DP655932): From SP2 Road Infrastructure Facility to B4 Mixed Use Zone. The Complete Streets Master Plan (2019) recommends retaining this site as a car park. It is envisaged that any future redevelopment of the site could incorporate car parking.</li> <li>○ 33 Meredith Street, Bankstown (Lot 72 DP 710726): it is proposed to rezone this site from SP2 Emergency Services Facility (existing ambulance centre) to B4 Mixed Use to facilitate redevelopment to provide employment floor space and jobs.</li> <li>○ 27-31 Meredith Street, Bankstown (Lots 1-2 DP 302765 and Lot 27 DP655932): It is proposed to re-zone this site from SP2 – Road Infrastructure to B4 Mixed Use to facilitate redevelopment and provide employment floor space and jobs.</li> <li>○ 20 Featherstone Street (Lot B DP 432479) and 369 Chapel Road (Lot 10 DP 5541): It is proposed to rezone this site from SP2 – Public Administration to B3 - Commercial Core zone to enable complimentary ancillary uses on the current Bankstown Courthouse site (such as a café).</li> </ul> <p>Refer to the Proposed Land Use Map in Objective 3.1 of the draft Plan at Attachment A for the proposed Zoning Map.</p> <p><u>Floor Space Ratio Map</u></p> <p>Amend the Floor Space Ratio Maps to include changes to FSR across the Bankstown City Centre to reflect changes to residential and business zonings and provide for new jobs and housing. The proposed changes to the FSR maps have been informed by development feasibility and viability testing and urban design modelling to account for setbacks, likely future amalgamation patterns and solar access. The FSR maps will remove FSR from land that is proposed to be zoned RE1 Public Recreation and FSRs will be applied to sites that were previously zoned SP2 Infrastructure.</p> <p>The FSR Map is to be amended to reflect amended FSRs based on the 'Proposed Floor Space Ratio Map' at Objective 9.1 of the draft Plan at Attachment A. It is noted that sites receiving a significant uplift in FSR will have FSR uplift reflect on the Incentive Floor Space Ratio Map (discussed further below).</p> <p>The FSR Map is to also be amended to remove 'Area' based controls which provide restrictions to floor space based on site area or frontage. These provisions will be replaced by the proposed tall buildings provisions (discussed below).</p>



Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
	<p><b><u>Height of Buildings Map</u></b>  Amend the Height of Buildings Map to increase maximum building heights in key locations as set out by the Bankstown City Centre Maser Plan Intensification Strategy Map which generally includes land clustered around the Bankstown Railway Station (and future Metro Station). The intended outcome of the changes to the Height of Buildings Map is to align maximum building heights with the maximum FSR achievable on the site and have been informed by testing and modelling by Council's Urban Design team.</p> <p>Depending on the proposed level of uplift, the building heights proposed within Objective 9.1 of the draft Plan will be reflected on the Height of Buildings Map, or the proposed Incentive Height of Buildings Map (discussed below).</p> <p><b><u>Incentive Floor Space Ratio Map, and Incentive Height of Buildings Map</u></b>  Introduce an Incentive Floor Space Ratio Map and Incentive Height of Buildings Map. These maps will identify land that will be subject to the proposed '<i>Clause 6.XX – Incentive height of buildings and floor space in Bankstown and Campsie</i>'. Refer below for the proposed clause intent. These Maps will set out the maximum height and floor space for each site (excluding the sustainability bonus) that will be capable of accessing the incentive height and floor space scheme.</p> <p><b><u>Land Reservation Acquisition Map</u></b>  Amend the Land Reservation Acquisition Map to include part of 55 De Witt Street, Bankstown. Council received a written comment from the landowner of 55 De Witt Street, Bankstown. Whilst the site is located outside of the draft Plan boundary, on review of the submission, Council considers there is merit in proceeding with rezoning of a portion of the site to IN2 Light Industrial to reflect its current use, whilst maintaining part of the site as RE1 Public Recreation, to formalise existing public access through the site (known as the Salt Pan Cycleway). The full extent of the site is not required for open space.</p> <p>The Land Acquisition Map is to be amended as part of the Planning Proposal to reflect this.</p> <p><b><u>Special Provisions Map</u></b>  Amend the Special Provisions Map to identify the Bankstown City Centre as '<i>Area XX</i>' (<i>number to be confirmed at LEP Amendment finalisation stage</i>) to give effect to and reference new LEP clauses including delivery of infrastructure on individual sites in the form of open space or through site links and apply a sustainability incentive scheme which incentivises sustainability excellence in development.</p>

Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
	<p>This map is to be prepared prior to lodgement of the Planning Proposal for Gateway.</p> <p><u>Active frontages map</u> Amend the active frontages map to reflect the intended activation of Stanley Street and Stevens Reserve. The active frontage will be along the boundaries of 2 Percy Street, Bankstown.</p> <p><u>Key Sites Map – New Map</u> Introduce a Key Sites Map to Include three sites in the Bankstown City Centre that will be required to provide a minimum of 50% of floorspace as non-residential uses. The purpose of this clause is to ensure the delivery and long-term protection of the employment-generating floor space to meet job targets for the Bankstown City Centre. Details of the three sites are provided below in <i>Amend Clause 6.12 - Restrictions on development in Zone B4 Mixed Use</i> and are identified on the <i>Land Use Zoning Map</i> at Objective 3.1 of the draft Plan.</p> <p><u>Additional Permitted Uses Map</u> Amend the additional permitted uses map to allow restaurants and cafes and takeaway food or drink premises on 2 Percy Street, Bankstown (Lot 1 DP166768) in the R4 – High Density Residential Zone to encourage active uses adjacent to Stevens Reserve.</p> <p>This map is to be prepared prior to lodgement of the Planning Proposal for Gateway.</p>
<b>Amended Clause 4.4 – Floor Space Ratio</b>	Amend clause to encourage lot consolidation and the delivery of functional and efficient floorplates in the Bankstown City Centre. The current site frontage restrictions are to be removed from this clause and replaced with the proposed tall buildings clause (outlined below).
<b>Amended Clause 4.4A – Additional gross floor area for more sustainable development in Bankstown</b>	<p>Amend Clause 4.4A to apply this clause more broadly across the Bankstown City Centre and update the clause to meet current best practice standards for supporting Council's objective of achieving net zero emissions by 2050. The intended outcome of the updated clause is to incentivise new development in the Bankstown City Centre to achieve best practice sustainability outcomes and building efficiency measures by granting bonus FSR of up to 0.5:1 for development that meets the criteria outlined in the clause. This will be achieved through the following measures:</p> <ol style="list-style-type: none"> <li>1. Identifying land on the Floor Space Ratio Map or Special Provisions Map that will be subject to this clause.</li> <li>2. Apply the clause to a range of development types including residential flat buildings, commercial premises, tourist accommodation and mixed-use development.</li> </ol>



Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
	<ol style="list-style-type: none"> <li>3. New development will not be connected to natural gas, include installation of a solar PV system and for residential development, achieve energy and water efficiency targets as set out in the draft Plan and supporting Sustainability Study.</li> <li>4. There will be specific energy, water and emissions controls for non-residential development including office premises, shopping centres/retail development or new hotels as set out in the draft Plan and supporting Sustainability Study.</li> <li>5. All other development not covered by the above criteria will be required to demonstrate exceeding the Section J 'Energy Efficiency' National Construction Code Building Code of Australia by 15%.</li> <li>6. Setting out the allowable bonus floor space ratio, being up to an additional 0.25:1 if the total resultant FSR of development will be 1.5:1 or less, or 0.5:1 if the total resultant FSR of development will be more than 1.5:1. This bonus FSR may be applied above the maximum FSR permitted on the 'Maximum Floor Space Ratio' Map, or the 'Incentive Floor Space Ratio Map'.</li> </ol>
<b>Amend Clause 6.12 - Restrictions on development in Zone B4 Mixed Use*</b>	<p>Amend Clause 6.12 as follows:</p> <ul style="list-style-type: none"> <li>• Introduce a 'no net loss of employment floor space' clause. Sites that have more than the minimum required employment floor space requirement within existing development, the redevelopment will be required to accommodate the equivalent quantum of employment floor space as a minimum.</li> <li>• Include three sites in the Bankstown City Centre within the requirement to provide a minimum of 50% of floorspace as non-residential uses. The purpose of this clause is to ensure the delivery and long-term protection of the employment-generating floor space to meet job targets and to realise the vision for the Bankstown City Centre. The three sites are: <ul style="list-style-type: none"> <li>○ 83-99 North Terrace and 62 The Mall - Lots 19-20 DP 5541, Lot 18B DP412699, Lots 15-17, 21-24 and 27 DP5541, Lot 1 DP207810, Lot 1 DP507818 and Lot 9 DP777510 (known as the 'Compass Centre Site').</li> <li>○ 304 South Terrace and 12 Restwell Street – Lot 1 DP615638 and Lot 3 DP234101.</li> <li>○ A portion of 1 North Terrace – Lot 11 DP 74620.</li> </ul> </li> </ul>
<b>Amend Clause 6.19 – Design excellence at certain sites at Bankstown</b>	<p>This clause is site specific to 83-99 North Terrace and 62 The Mall - Lots 19-20 DP 5541, Lot 18B DP412699, Lots 15-17, 21-24 and 27 DP5541, Lot 1 DP207810, Lot 1 DP507818 and Lot 9 DP777510 (known as the 'Compass Centre Site'). It specifies the FSR for this site. The FSR (Clause 6.19 (3)(b)) is to be updated in this clause from 5:1 to 5.3:1. It is noted that the sustainability clause will also be applicable to this site, in addition to the prescribed 5.3:1 under this clause.</p>



Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
<p><b>Introduce Clause 6.XX – Incentive height of buildings and floor space in Bankstown and Campsie</b></p>	<p>Introduce a Height and FSR incentive clause to incentivise the provision of on-site community infrastructure, affordable housing, and employment-generating uses. The intent of the new clause is to allow additional building height and additional floor space for development that:</p> <ul style="list-style-type: none"> <li>• Provides community infrastructure necessary for Bankstown City Centre and considers the nature and value of that infrastructure, or</li> <li>• The provision of affordable housing that comprises 1%, 2% or 3% of the total development yield for Development Applications lodged 12 months, 12-24 months and after 24 months of the date of the gazettal of the clause in the draft CBLEP 2021, or</li> <li>• 50% of the total Gross Floor Area is for employment generating uses, and where applicable, provides community infrastructure as noted above.</li> </ul> <p>The provision of on-site infrastructure will be included in an adopted Council document (such as the DCP) and include maps showing the location of required infrastructure as identified by Council. Development that is located on sites that are identified by Council as required to provide on-site infrastructure will benefit from increased building height and FSR bonuses to offset the cost of providing the on-site infrastructure. Such sites would not be required to contribute to Affordable Housing.</p> <p>In addition, development that proposes more than 50% employment-generating uses, will also not be required to contribute to Affordable Housing. Employment-generating uses will include centre-based child care facilities; commercial premises; community facilities; educational establishments; entertainment facilities; function centres; health services facilities; hotel or motel accommodation; information and education facilities; passenger transport facilities; public administration buildings; recreation facilities (indoor); registered clubs; residential aged care facilities; tourist and visitor accommodation.</p>
<p><b>Introduce a Tall Buildings Design Requirements Clause*</b></p>	<p>Introduce a Tall Building Clause that will apply to 'tall buildings', being buildings over 50m in the Bankstown City Centre, that must have a minimum frontage of 30m and 1,500m<sup>2</sup> in total site area.</p> <p>The intended outcome of the clause is to encourage good building design outcomes of tall buildings including at the ground level by including clause objectives that will require the ground floor level of tall buildings to have active street frontages, the tower design to be compatible with its context and do not adversely affect the amenity of public places. The draft DCP amendment that will apply to the draft Plan area will include reference to the clause and provide development controls to support the objectives and development</p>



Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
	standards which will have greater statutory weight to seek high design quality tall buildings. These controls will implement the recommendations of the Tall Buildings Study.
<b>Introduce an Underground Floor Space Ratio Exclusion Clause*</b>	<p>Due to the potential to develop limited uses in basement/underground settings, it is proposed that developments be permitted to provide underground floor space in addition to the maximum Floor Space Ratio. This clause will include:</p> <ul style="list-style-type: none"> <li>• Objectives to ensure retaining an active and safe streetscape and public domain around the site.</li> <li>• Limitations on the type of uses (such as supermarkets, retail, theatres, community facilities, entertainment facilities, registered clubs and the like).</li> <li>• Limitations on minimum lot size to which development can apply this clause.</li> <li>• Mandating minimum floor to ceiling heights for such uses of 3.7 metres and ensuring the upper most basement levels closest to the Ground Floor are used for underground floor space.</li> <li>• Application of this clause in areas subject of limited car parking controls.</li> </ul> <p>This may require identification of areas to which this clause may apply on the Special Provisions Map.</p> <p>This clause will specify that underground floor space will be permitted <u>in addition</u> to the maximum floor space ratio prescribed to a site on the Floor Space Ratio or Incentive Floor Space Ratio Maps.</p>
<b>Amend Schedule 1 – Additional Permitted Uses</b>	Add 'restaurants and cafes' and 'takeaway food or drink premises' uses as an Additional Permitted Use to 2 Percy Street, Bankstown, to allow for activation of Stanley Street and the interface to Stevens Reserve.
<b>Amend Schedule 2 – Exempt Development</b>	Add a new subclause in Schedule 2 – Exempt Development to allow late night trading in B4 Mixed Use Zone for a range of uses without requiring development consent of Council. The amendment to Schedule 2 will specify the types of uses that will be subject to this clause.

*\*Note: Council is considering including these clauses under a single consolidated LEP clause to apply to only land within the Strategic Centres of Campsie and Bankstown. While the final structure will be resolved post-Gateway the intent of these clauses is not altered.*

## **Development Control Plan Amendment for Bankstown City Centre**

Council intends to prepare a comprehensive set of DCP amendments to the consolidated Canterbury Bankstown DCP 2021 to support the Planning Proposal. The draft DCP amendment will include specific controls relating to built form, design and materiality, local character, setbacks, landscaping and tree canopy, sustainability, building performance, open space and design excellence and a range of other controls identified in the draft Plan and supporting studies.

Council intends to place the draft DCP amendment on public exhibition alongside the Planning Proposal, should the proposal receive a Gateway determination.

-END-

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## Canterbury Bankstown Local Planning Panel - 09 and 10 September 2021

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<b>ITEM 2</b>	<b>Campsie Town Centre Planning Proposal</b>
<b>APPLICANT</b>	<b>Council Initiated Planning Proposal</b>
<b>OWNERS</b>	<b>Various</b>
<b>AUTHOR</b>	<b>Planning</b>

### **PURPOSE AND BACKGROUND**

The purpose of this report is to seek the Local Planning Panel's advice on proposed changes to the Canterbury Bankstown Local Environmental Plan (CBLEP). The proposed changes will shortly be presented to Council and supported by a Statement of Objectives and Intended Outcomes. These proposed changes have been established through the preparation of a detailed Master Plan for the Campsie Town Centre.

The Draft Campsie Town Centre Master Plan (draft Plan), sets the strategic planning basis and supports a series of amendments to planning controls aimed at facilitating jobs, housing, design, sustainability and movement aspirations initially established by Council's Local Strategic Planning Statement, Connective City 2036. The draft Plan is the first stage of a suite of place-based master plans for the City, which will be incrementally implemented by Council (subject to its approval).

This report presents the draft Plan, Statement of Intended Outcomes of the Planning Proposal, report on the outcomes of early engagement undertaken by Council and associated background to the Panel's its information in considering the proposed changes to the Canterbury Bankstown LEP.

Campsie Town Centre is expected to evolve from a main street local centre into a health and lifestyle precinct that services Canterbury-Bankstown and beyond. The draft Plan seeks to leverage the unique attributes and anchors of Campsie, such as its location on the Cooks River, the presence of Canterbury Public Hospital and amenities such as the Belmore Sports and Recreational Precinct and Canterbury Aquatic Centre, to facilitate 7,500 jobs and an additional 5,600 dwellings in the centre and 760 dwellings along Canterbury Road by 2036. The draft Plan provides a framework to inform the delivery of infrastructure, improvements to the design and sustainability of buildings, public domain improvements, the delivery of affordable housing, increased capacity for jobs, housing and community facilities and an approach to the management of heritage and character.

Council undertook early community engagement and sought feedback on the draft plans as part of ongoing engagement that has occurred since July 2020. The period for the community to provide feedback on the draft plans was from 29 March to 14 May. Written feedback

received until 11 June has also been considered. Council wrote to approximately 12,454 owners and occupiers of residential and commercial properties to inform them of the draft Plan and the ongoing community engagement process. During this time, 61 community members provided written feedback relating to the draft Plan, and 66 provided written feedback that referred to draft Plans for both Bankstown and Campsie. A total 127 comments in writing (letter or email) were received, of which, 110 were written in support (entirely or with conditions), 15 objected (both entirely and to specific aspects of the plan) and 2 neither supported or objected to the draft Master Plan, and instead made general commentary.

It is intended that Council will consider whether to prepare and submit a Planning Proposal for the Campsie Town Centre. The advice of the LPP in this respect will assist Council in considering the matter. It is also the role of Council to consider whether to endorse the draft Plan.

## **ISSUE**

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Having regard to the comments and feedback made during the early engagement process from the community, the draft Plan has been revised to reflect a number of changes. It is intended that the Master Plan (if adopted) forms the basis of amendments to the planning controls for the Campsie Town Centre, which will include amendments to the consolidated Canterbury Bankstown LEP (pending its gazettal).

## **RECOMMENDATION** That -

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1. The Local Planning Panel reviews the revised Campsie Town Centre Master Plan and provides advice on proposed changes to the Canterbury Bankstown Local Environmental Plan 2021 as outlined in this report.
2. Council prepares and submits a Planning Proposal to amend the draft Canterbury Bankstown Local Environmental Plan 2021 for Gateway that implements the Campsie Town Centre Master Plan, subject to:
  - (a) Preparation of draft LEP Amendment maps to include with the Planning Proposal;
  - (b) Completion the following studies prior to submission for Gateway:
    - i. Independent Flood Review, to confirm consistency with Section 9.1 Direction 4.3 – Flooding;
    - ii. Land Use Safety Study, to ensure appropriate mitigation measures are considered (if any) in relation to high pressure pipelines located alongside the Cooks River;
    - iii. Preliminary Contamination Assessment, to confirm consistency with Section 9.1 Direction 2.6 – Remediation of Contaminated Land.
  - (c) Council prepares a Development Control Plan to implement the Master Plan that is exhibited concurrently with the Planning Proposal.
3. Council integrates existing Planning Proposals set out in this report into the Campsie Town Centre Master Plan.



**ATTACHMENTS** Click here for: [Attach A](#), [Attach B and C](#), [Attach D](#), [Attach E](#)

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- A. Revised Draft Campsie Town Centre Master Plan (August 2021)
- B. Early Engagement Outcomes Report
- C. Planning Proposal Assessment Findings
- D. Technical Studies and Analysis
- E. Current and Proposed Land Reservation Acquisition Map

## POLICY IMPACT

This draft Plan begins to implement Council's strategic planning established under the Canterbury Bankstown Local Strategic Planning Statement, Connective City 2036, the Community Strategic Plan, CBCity 2028, and Council's Housing, Employment Lands and Affordable Housing Strategies.

If adopted by Council, the draft Plan will become a policy of Council, and form the basis of the Planning Proposal to amend the Canterbury Bankstown LEP 2021 (pending its gazettal). In addition, it will form the basis of changes to Council's consolidated Development Control Plan in relation to future development within the Campsie Town and a consolidated Contributions Plan for the City.

Changes to Council policies, including the Local Environmental Plan, Development Control Plan, Contributions Plan and other plans or policy changes arising from the planning proposal progressing, will be required to be reported to Council separately for implementation.

The draft Plan itself will not result in any changes to current planning controls. It is requested that the Local Planning Panel provide advice to Council to inform its decision on whether to proceed with the preparation and submission of a Planning Proposal, which is the formal commencement of the process to amend the current planning controls.

The Master Plans in the context of the broader planning policy framework is illustrated below.

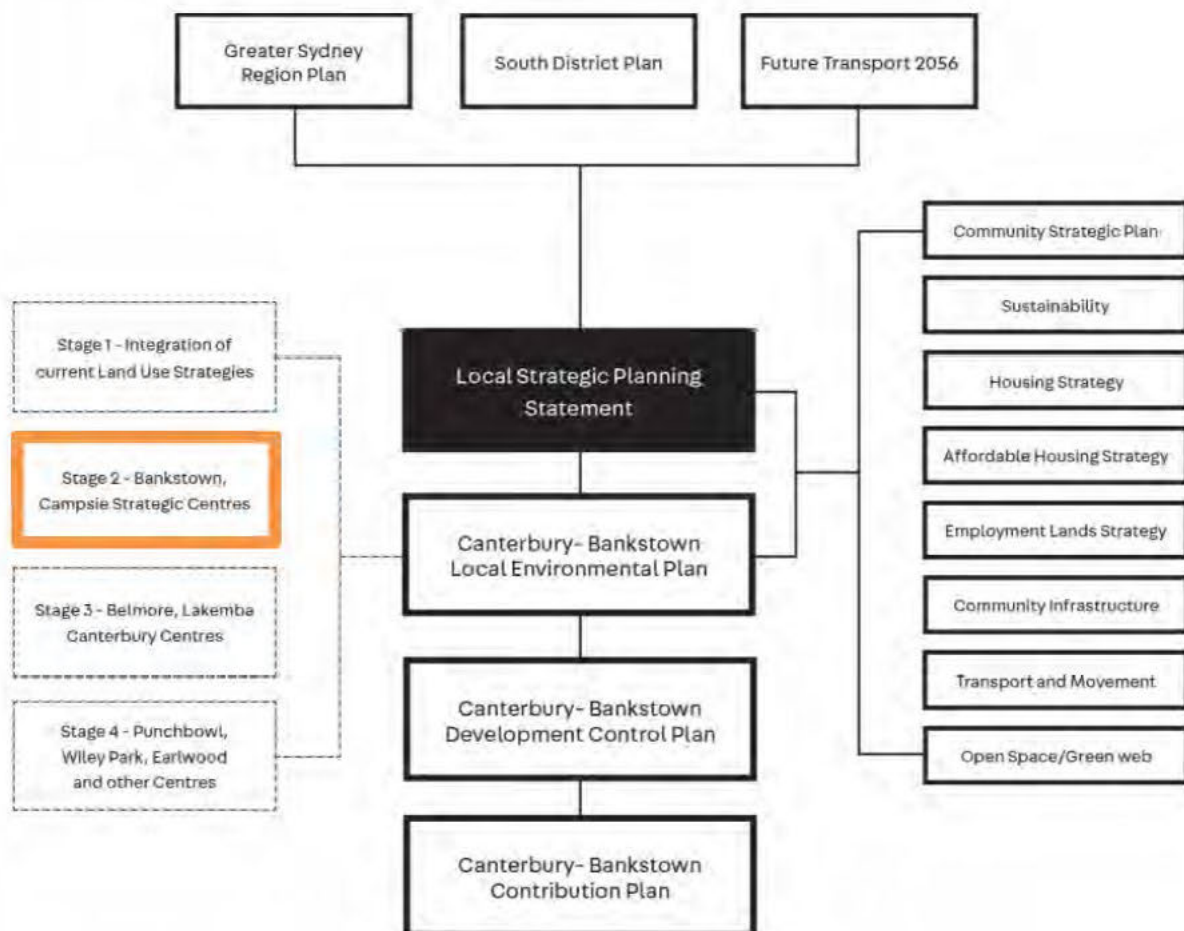


Figure 1. Planning Policy Framework

## **FINANCIAL IMPACT**

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The draft Plan has been primarily funded by Council, with some funding also provided by the NSW Department of Planning, Infrastructure and Environment.

If adopted, the draft Plan will inform Council's investment in infrastructure from a range of sources including Section 7.11 and 7.12 contributions, property and asset renewal, works in kind, further master planning for Council assets such as the Campsie Cultural and Civic Hub and informing capital work programs. It is noted that any change to Council's contributions plan, capital works program and future plans for Campsie Cultural and Civic Hub, will require future reports to Council and will individually seek endorsement under separate cover.

## **COMMUNITY IMPACT**

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The draft Plan will guide planning controls for development across this centre. It provides transparency for the existing community and certainty to industry with respect to the planned growth and change envisaged for Campsie over the next 15 years.

The revised draft Plan has been amended to incorporate a number of changes following early feedback received from the community and stakeholders. The revised plan provides the community, industry and government with confidence and certainty in ensuring managed growth and change in the Campsie Town Centre, with a clear vision and expectations for high standards of design and sustainability.

Building on the ongoing engagement with the community since July 2020, community feedback was sought on the draft Campsie Town Centre Master Plan between 29 March and 14 May 2021, with submissions received until 11 June also assessed and considered. Council wrote to 12,454 owners and occupants of commercial and residential properties to inform them of ongoing community engagement regarding the draft Plan. During this period, a total 127 submissions were received, 61 of which related to Campsie only, and an additional 66 submissions which related to both the draft Bankstown and Campsie Master Plans, which were concurrently released for feedback. Of the 127 submissions, 110 were written in support (entirely or with conditions), 15 objected (both entirely and to specific aspects of the plan) and 2 neither supported nor objected. During this time, Council also undertook the following activities to maximise the community's awareness and engagement with the process:

- Online community survey
- Interactive map for feedback
- Availability of planning staff to directly liaise with the community through 'speak to an expert' service
- 4 x pop-up sessions
- Community webinar
- Government agency briefing
- Social media posts
- Dedicated 'Have Your Say' Page
- Planning Proposal Applicant engagement, supported by Probity Advisor
- Mail-out to all households in the master plan study area (12,454 letters sent).

Should the draft Campsie Master Plan be adopted and endorsed to proceed to Gateway, a Planning Proposal process will commence. If NSW Department of Planning, Infrastructure and Environment issue Gateway approval for the Planning Proposal, Council will undertake a formal exhibition process in accordance with the conditions of Gateway. Formal exhibition will be for a minimum period of 28 days.



## DETAILED INFORMATION

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### INTRODUCTION

Campsie Town Centre is the second largest strategic centre in the Canterbury Bankstown Local Government Area. Investment by the State Government in delivering Sydney Metro services to Campsie, will place the centre within 20 minutes by Metro to Sydney CBD, making Campsie an increasingly attractive centre for visiting, living and working. The draft Plan establishes the framework for Campsie's evolution from a main street into a destination centre that contributes to our city's prosperity, innovation and attractiveness.

The draft Plan has been developed through ongoing community engagement to implement the vision and actions of *Connective City 2036*, Council's Local Strategic Planning Statement, along with Council's Housing, Employment Lands and Affordable Housing Strategies.

The draft Plan has been informed by thorough critical analyses, including specialist technical inputs relating to urban design, transport, land use economics, indigenous culture and heritage, sustainability, heritage and infrastructure planning.

The Master Plan process and current status is illustrated below:

Status	Stage
✓	Technical and preliminary analyses
✓	Early targeted engagement
✓	Preparation of draft Master Plan
✓	Report to Council noting the preparation of the draft Master Plans
✓	Broad community feedback on the draft Master Plan
<b>We are here</b>	Report to Local Planning Panel for advice
To be confirmed following LPP meeting	Report to Council for consideration to adopt Master Plan and prepare and submit a Planning Proposal
To be confirmed, pending endorsement of Council	Commence Planning Proposal process

### THE DRAFT MASTER PLAN – OVERVIEW

The draft Plan is underpinned by a long term strategic vision. This vision has then been translated through a series of "spatial moves" and "intensification" approaches, which have been used to guide the 10 Directions, outlined in detail below.

#### *The Vision*

The Vision for the Campsie Town Centre is:

*"Campsie will transform from a main street into a thriving lifestyle and medical precinct that brings together the vibrancy of Beamish Street, Canterbury Hospital and the amenity of the Cooks River foreshore. This evolution will be underpinned by development that responds to the human scale and existing urban character."*

*Campsie will become a significant centre within Canterbury-Bankstown, with significant investment in jobs and housing, which will attract residents, workers and visitors alike. Future development will be supported by improved transport connections, an activated riverfront and green streets.*

*Campsie will become a civic and cultural hub for Inner Sydney, supported by its close proximity to Central Sydney. The centre will have new and enhanced community, arts and cultural facilities complementing a growing night time and visitor destination."*

## **10 Directions**

The draft Campsie Town Centre Master Plan is underpinned by **10 directions**, outlined below:

1. A centre that aligns growth with public benefit
2. A centre for people
3. A centre that attracts health and lifestyle investment
4. A well-designed centre
5. A riverfront centre with nature at its heart
6. A centre at the cross roads of inner Sydney
7. A resilient and carbon neutral city by 2050
8. A centre proud of its heritage and culture
9. A centre with housing for all
10. A centre with collaborative governance

These 10 directions ensure the approach to growth and change is holistic and considers the broader needs and aspirations of the city – from ensuring infrastructure aligns with growth, to building a strong night-time economy and ensuring adequate housing that is well designed and sustainable.

## **Key moves**

The draft Plan proposes a series of key moves, which are proposed changes in policy and direction. These include:

- Incentive-based height and floor space system – where sites are proposed to receive uplift (generally of more than 1:1) above current controls, the uplift is intended to be subject to the provision of on-site infrastructure, affordable housing and/or employment-generating floor space – *Feedback received during engagement with the community did not raise issues with respect to this key move.*
- Infrastructure funding, delivery and advocacy strategy – a clear strategy for the development of infrastructure in Campsie is established, utilising a combination of Section 7.11 and 7.12 contributions, property renewal and capital works investment – *Feedback received during engagement with the community emphasised the need to ensure growth is supported by infrastructure (refer to key issues discussion below).*
- Affordable housing delivery – *Feedback received during engagement with the community was generally supportive of the provision of affordable housing. Some feedback noted the rate of 3% should be higher, however, as clarified in the revised master plan, it is noted that this applies to the whole of development, whilst targets set by the State Government of 5-10% only apply to floor space uplift, which would yield less affordable housing than is proposed by the draft Master Plans.*

- Sustainability initiatives – *Feedback received during engagement with the community strongly supported these initiatives.*
- Changes to parking requirements for new developments – *Little feedback received during engagement with the community raised issues with respect to this key move.*
- Recommended changes in height and density – *Significant feedback was received, primarily site specific, with respect to height and density. These submissions were carefully assessed and tested in the development of the revised Master Plan.*

## EARLY ENGAGEMENT ACTIVITY

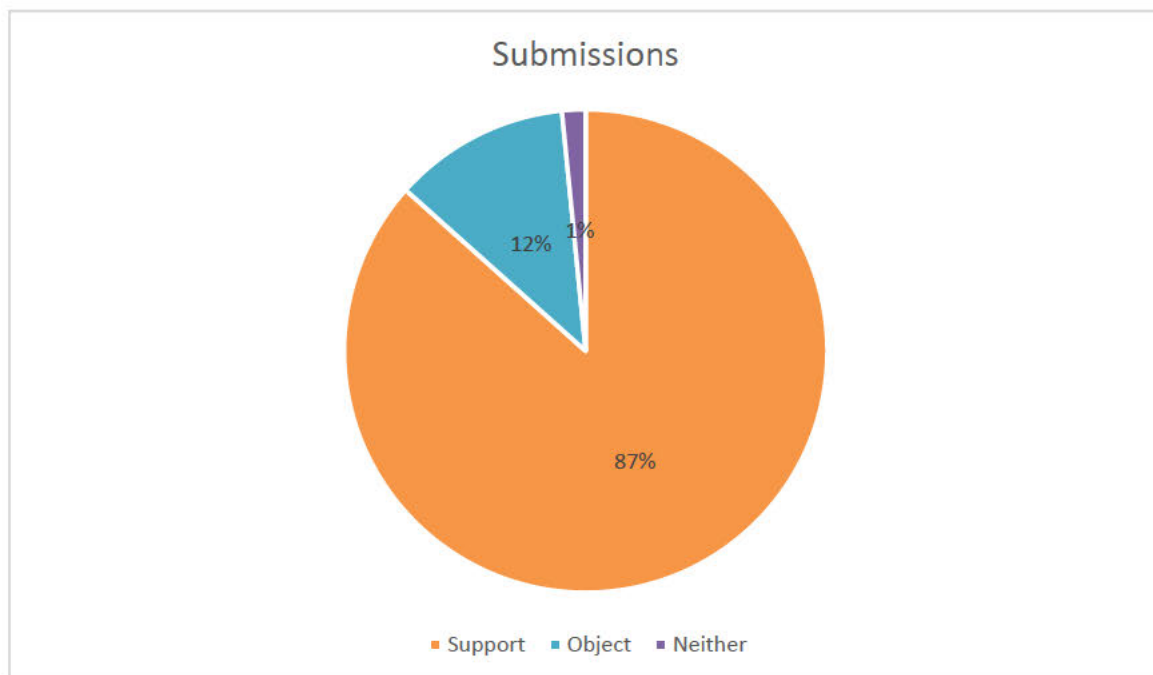
A summary of early engagement activities and responses are set out in the table below.

Engagement/promotional activities	Campsie Master Plan	Combined (submissions that relate to both)
Direct mail to landowners and occupants	12,454	
Community Survey responses	42	-
Interactive map comments	67	-
'Speak to an expert' calls	74	-
Direct written submissions	61	66
Petitions	-	1 x 229 signatures (supporting sustainability initiatives)  1 x 12 signatures (supporting sustainability initiatives)
Pop-up conversations/flyer hand-outs	1,525	-
Community Voice Panel attendees	4	-
Community Webinar Views	73	-
Agency/institutional briefing attendees	-	110
Industry Forum	-	10
Community Information Session Attendees	40	-
Social media clicks to view Master Plan documents	489	-
Direct Have Your Say Page Views/Document Downloads of Master Plan and associated technical studies	7,388	-
<b>Total</b>	<b>22,217</b>	<b>427</b>



The graph below gives an indication of the level of support and objection to the plans. In summary:

- 87% of submissions either supported the draft Master Plan, some entirely, and others with suggestions for improvement or change;
- 12% objected to the draft Master Plan; and
- 1% neither supported or objected to the draft Master Plan, and instead made general commentary.



The top five issues raised in feedback from the community are detailed below:

1. **Support for sustainability initiatives** – there was significant support from the community for the forward-thinking and innovative approach to sustainability. The Master Plan outlines a plan to improve baseline sustainability in development, along with providing further incentives for development that achieves excellence in sustainability. This includes initiatives such as encouraging all-electric buildings, solar electricity generation, electric-vehicle charging and exceeding standards for energy and water efficiency and thermal comfort. These initiatives are maintained in the revised master plan.
2. **Support for improvements to active transport infrastructure** – the proposed investments in improving active transport infrastructure were particularly supported by the community. This included support for the enhancement of the Cooks River active transport corridor, future east-west active transport connections along the Metro (currently being planned by Transport for NSW and Sydney Metro). Council recognises the importance of this aspect of the plan, and will develop a *Campsie Complete Streets Place and Transport Plan* which will further detail and develop plans for active transport in and around Campsie, consistent with the vision set by the Master Plan.



3. **Need for more community infrastructure – a number of people** noted that Campsie currently lacks quality community infrastructure, and that growth is likely to further impact on the adequacy of infrastructure to meet current and future demand. A few people made reference to local infrastructure, State infrastructure (schools and hospitals) and in some instances, transport infrastructure. Council has consistently called for a coordinated growth and infrastructure strategy that ensures current and future infrastructure needs are appropriately planned for, funded and delivered. The draft Plan is supported by an infrastructure strategy which sets out a plan for funding, delivery and advocacy of infrastructure, including:
- a. Recommendations to inform a consolidated city-wide Contributions Plan which includes the funding of local infrastructure, such as open spaces, community facilities, roads and transport infrastructure.
  - b. Proposed renewal of Council's property assets to realise new, contemporary and fit-for-purpose community infrastructure such as the Campsie Civic and Cultural Hub.
  - c. Provision of on-site infrastructure through an incentive height and floor space provision.
  - d. Advocacy to the NSW State Government for upgrades to Canterbury Hospital, local schools and regional roads.

The draft Plan, for the first time, sets a clear plan for growth that provides clarity to the community, Council and the State Government on the forecast growth for Campsie, and allows agencies to plan for this.

4. **Support for the increase in local jobs** – A number of comments from the community during the early engagement period recognised that there are little job prospects in Campsie. These comments supported the draft Master Plan's vision for more and diversified job prospects in the centre, particularly focused on health and medical industries, but also on expanded retail, services, professional and night-time economy related jobs. The revised Master Plan furthers this opportunity of job creation by recommending further investigation into limited additional employment-generating floor space in subterranean parts of buildings, such as underground supermarkets, registered clubs, cultural facilities.
5. **Site specific submissions** – A number of landowners made site specific submissions, generally seeking an uplift in density that what has been prescribed in the master plan. These submissions were considered on a case-by-case basis, in the context of the intensification strategy and desired future character of each precinct within the Master Plan study area.

## REVISED MASTER PLAN

Following a review of submissions and further analysis, a number of amendments have been made to the draft Campsie Master Plan. The key changes are summarised below:

1. **Canterbury Hospital:** In response to a number of concerns regarding the ability of Canterbury Hospital to cater for the planned growth of Campsie, a new action has been added to reaffirm the commitment of Council to continue to advocate and work with NSW Health to expand and invest in Canterbury Hospital. It is noted that the Master Plan

retains no built form controls on the site (i.e. no height or density controls) to enable the hospital to expand for the purposes of health and related uses. Furthermore, the Master Plan maintains rezoning of lands around the Hospital for employment or mixed uses, to facilitate further health services clustering around the Hospital. Refer to *Direction 1* and *Action 10.1.6* of the revised draft Master Plan.

2. **Commuter Parking:** Feedback received from the community raised the need for commuter parking in Campsie, particularly as the provision of Sydney Metro services may attract additional commuters to the centre. On this matter, the Master Plan advocates for the development of a commuter car park on State Government land close to the Metro. Refer to *Action 1.1.5* of the revised draft Master Plan.
3. **Underground floor space:** On analysis of a number of site-specific submissions as well as a precedent study of other locations in Sydney, it has been deemed that the use of underground floor space for a limited number of retail and community uses should be investigated through the Planning Proposal process. This has the ability to facilitate larger uses such as supermarkets, parts of registered clubs and community facilities, to be located underground, facilitating improved street activation by reducing large format uses at street level, and also allow for greater ground floor permeability. This would also assist in achieving the jobs target for Campsie. Refer to *Objective 1.4* and *Action 1.4.4*.
4. **Areas of intensification:** Based on a number of submissions, the areas of intensification have been revised. These areas are identified on Figure 2. They include:
  - a. Block A (Fifth, Sixth, Eighth and Ninth Avenues) – Additional area for intensification – this block was originally considered unsuitable for renewal given the perceived fragmented lot ownership of the strata development within this block. However, on review and in response to submissions, it is understood that several sites within this block are not wholly fragmented and have the opportunity to redevelop. Given the block’s proximity to Campsie Railway Station, the Civic and Cultural Hub and other services and amenities, it is recommended that this block now be included as an area for intensification.
  - b. Block B (areas between Amy and Evaline Street) – Additional area for intensification – this block was originally considered unsuitable for renewal due to the perceived fragmented lot ownership within this block and earlier consideration of items within this block for further design, character and heritage analysis. On detailed review, and in response to community comments, this area has been identified as having potential for renewal. Given its proximity to other recommended high density areas, Campsie Railway Station, services and amenities, this location has been included as an area for some additional intensification.
  - c. Block C (Phillips Avenue) – Area removed for intensification – areas in the south-east of the Study Area, particularly around Tasker Park, were originally identified as areas for intensification due to their proximity to open space and amenities afforded by Tasker Park, the Canterbury Leisure and Aquatic Centre and the Cooks River foreshore. Through further analysis and response to submissions, it was found that some areas of this precinct may be impacted by flooding. In considering the flooding constraints of this precinct, development would become piecemeal, rather than allowing for consistent renewal and would therefore not result in orderly development outcome. As such, it is recommended that this area be removed as an area of intensification.

- d. Block D (Canterbury Road, between Duke and Park Street) – Additional area for intensification – this block was originally intended to retain current controls, however on review, it will be inconsistent with the intended character and outcome for development along Canterbury Road. For this reason, the Master Plan recommends the inclusion of these properties into the intensification area.
- e. Block E (Canterbury Road) - Intensification area along Canterbury Road expanded the size of the Canterbury Road/Beamish Street node to better align with the proposed built form controls and zoning. The health precinct boundary has also been expanded to demonstrate a clear connection to Canterbury Hospital and other employment generating land uses along Canterbury Road.

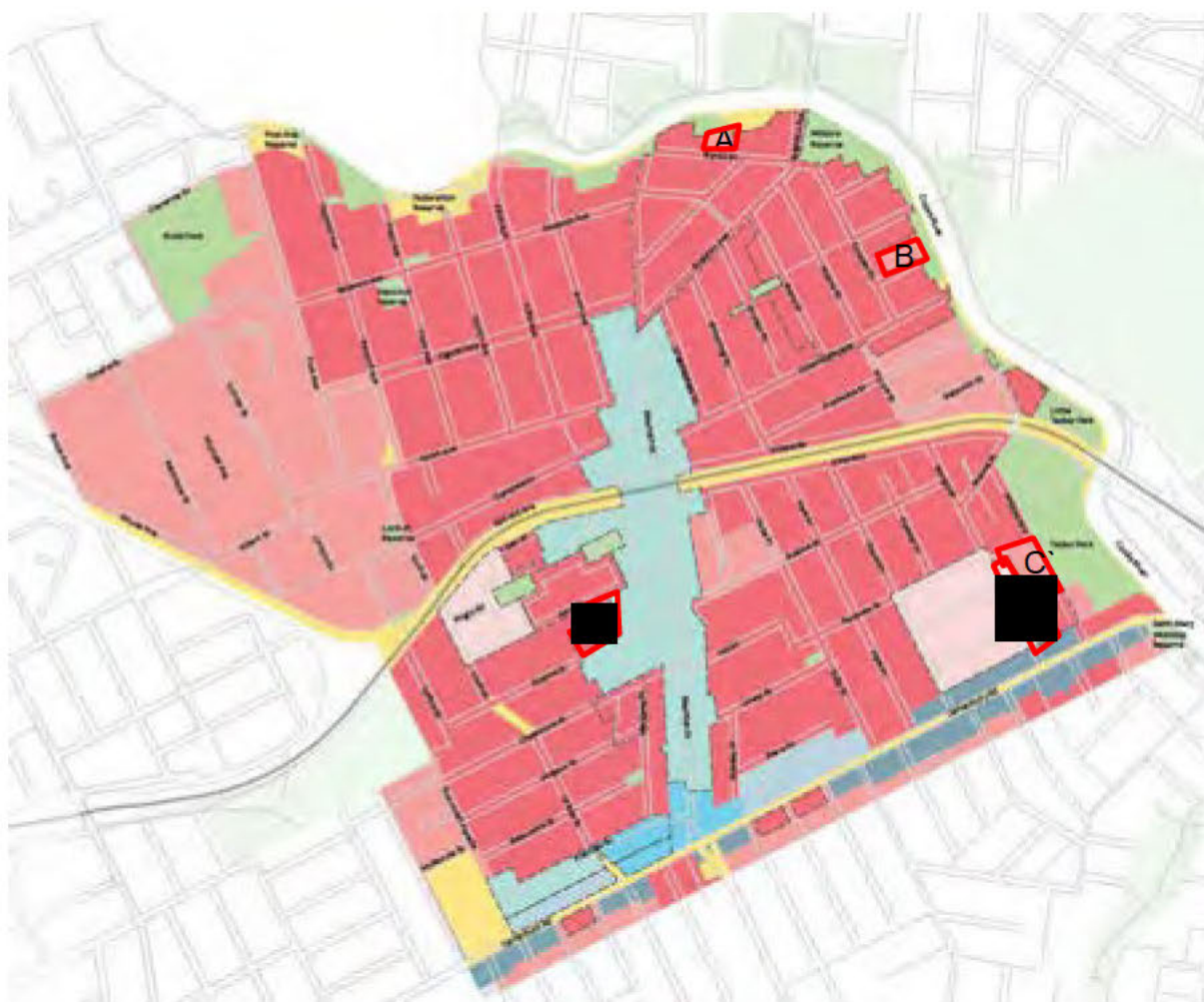


*Figure 2. Intensification Strategy Revisions*

The changes have also been reflected where necessary in the Urban Design Framework Plan and Character Area Maps.

5. **Land Use Zoning:** In response to submissions and further analysis, a number of modifications are proposed to the land use zoning map. These revisions are listed below, and are illustrated on Figure 3.
- a. Block A (17-25 Byron Street) – Retain current zoning – this block was originally considered appropriate for high density development, consistent with the proposed vision for the Cooks River Foreshore. However, further analysis suggests these sites may not be suitable for high density development due to the potential flood risk requiring significant raising of ground levels, resulting in poor outcomes for this precinct. These blocks look to have already been developed for multiple dwellings. As such, it is recommended that these sites not be zoned for high density residential uses, but rather retained for their current use.
  - b. Block B (6-12A Gordon Street) – Retain current zoning – this block was originally considered appropriate for high density development, consistent with the proposed vision for the Cooks River Foreshore. However, further analysis suggests these sites may not be suitable for high density development due to the potential flood risk requiring significant raising of ground levels, resulting in poor outcomes for this precinct. As such, it is recommended that these sites not be zoned for high density residential uses, and retain their current use.
  - c. Block C (Phillips Avenue/Ward Street) – Retain current zoning – this block was originally considered appropriate for high density development, consistent with the proposed vision for development around Tasker Park. However, further analysis suggests these sites may not be suitable for high density development due to the potential flood risk requiring significant raising of ground levels as well as the interface with the proposed R2 Low Density Residential Zone and an item recommended for heritage listing at Wonga Street. These blocks look to have already been developed for multiple dwellings. As such, it is recommended that these sites not be zoned for high density residential uses, and retain their current use.
  - d. Block D (Wonga Street between Warrigal Street and Ward Street) - Rezone to R2 Low Density Residential. Retention of the existing medium density zone was originally proposed. Further analysis suggests that lots fronting Wonga Street contribute to the adjacent character area proposed. As such it recommended that these sites be rezoned to Low Density Residential to reflect inclusion in the character area.
  - e. Block E (Amy Street/Evaline Street) - Retain current zoning – this block was originally considered appropriate for a B4 Mixed Use zone to expand the Campsie Core. However, further analysis suggests that these sites would be more appropriate as R4 High Density Residential given the sites are set back from Beamish Street and do not form part of a key site where commercial land uses are proposed.





*Figure 3. Land Use Zoning Revisions*

6. **Maximum building height:** In response to a number of submissions regarding renewal opportunities, transitions between adjacent buildings and further analysis, the following key building height changes are proposed. It is noted that the height includes incentive height, which for some sites will require the provision of on-site infrastructure, affordable housing or employment generating uses. The key changes are listed below and illustrated on the map:
  - a. **Area A** – These areas were originally not shown on the exhibited height map due to existing strata or recent development. These areas have now been included to reflect the same proposed heights of the surrounding blocks. The revised maps more closely reflect that maximum building heights that will be shown in the Planning Proposal.
  - b. **Area B** – These areas originally accommodated taller development, however further analysis of flood movement has identified these areas as potentially unsuitable for higher density development. As such, it is proposed the height under current LEP controls be retained.
  - c. **Area C** – The draft Master Plan originally excluded some areas from renewal due to perceived constraints associated with strata ownership, fragmented land ownership, recent DA approvals and/or potential heritage impacts. In response to multiple submissions and further analysis, these areas and the associated constraints have been further tested to consider whether uplift is appropriate. These areas have been recommended for an increase in height based on that testing demonstrating that renewal can occur in these areas, given their proximity

to Campsie Station, services and amenities, and the ability to contribute positively to the renewal of Campsie. The height in these areas has been determined based on the most appropriate contextual built form relationship.

- d. **Area D** – A number of submissions raised concern with the height transitions occurring mid-block, where the rear or side of properties was proposed to experience a significant change in height, without sufficient setbacks or ability to moderate the impacts of height change, such as privacy and overshadowing. These blocks have been further tested, and the heights modified to ensure a more appropriate mid-block height transition.
- e. **Area E** – In some areas, multiple heights were proposed across a single site or block. The revised plan seeks to rationalise height so heights align with property or block boundaries. This provides clarity for implementation through the LEP and ensures that the boundaries for various height zones are clear.
- f. **Area F** – The Master Plan makes recommendations for the height of a Planning Proposal at 445 Canterbury Road, Campsie. This Planning Proposal requires further built form, traffic and transport analysis. The height map has been amended to reflect the potential for further testing of this site, as this will be subject of a site specific Planning Proposal.
- g. **Area G** – Further analysis was undertaken on some sites to ensure appropriate alignment between height and floor space. This has resulted in some minor changes to height due to this additional testing and analysis. These changes are minor (i.e. no more than 1 or 2 storey variations to the exhibited master plan height).





Figure 4. Building Height Map with changes

7. **Sustainability bonus:** It is proposed that the sustainability bonus be amended in terms of the quantum of bonus floor space that can be achieved. The draft Master Plan proposed a 0.5:1 FSR bonus (similar to that currently in place for Bankstown City Centre), also be applied to development in Campsie. Given it is proposed to apply the sustainability bonus more broadly, a 0.5:1 FSR bonus for development achieving less than 1.5:1 is a substantial uplift that will result in poor built form outcomes. As such, for development with a proposed maximum FSR of less than 1.5:1, it is proposed that the Sustainability Bonus be reduced to 0.25:1 FSR.
8. **Bicycle parking:** Upon finalisation of the independent Parking and Loading Study , further recommendations on bicycle parking have been developed. The master plan has been revised to recommend the introduction of mandatory bicycle parking controls for the Campsie Town Centre.
9. **Additional items for heritage investigation:** Running concurrently to the Master Planning process is a city-wide heritage review. This is expected to be reported to Council separately upon completion, and will be exhibited for community review and comment should Council decide to proceed. Upon further analysis and in response to submissions, the following revisions are proposed, including the addition of further properties for heritage investigation:

- a. *2 Burns Street, Campsie* – a Federation weatherboard house with some alterations, constructed in circa 1915
  - b. *85 and 89 Frederick Street, Campsie* – Intact bungalow style residential development constructed circa 1914.
  - c. *10-12 Claremont Street, Campsie* – Semi-detached housing constructed in circa 1914, examples of late Federation housing.
  - d. *14 Tudor Street, Campsie* – Constructed in circa 1927, intact inter-war home in Californian Bungalow style.
  - e. *25 Baltimore Street, Belfield* – Constructed in circa 1914, late Federation, weatherboard home.
  - f. *Victorian Railway Bridge* – Whilst the site is already listed on the Canterbury LEP Heritage Map and Schedule, the listing does not refer to the Victorian Bridge, only to the Railway Bridge.
  - g. *38 Albert Street, Campsie* – Constructed in circa 1928, this is an inter-war bungalow, and representative of homes built in this area in the 1920s and 30s.
  - h. *Amendments to the boundary of the proposed Campsie Street Heritage Conservation Area* – this area was shown in error in the Master Plan to include contemporary multi-dwelling housing developments. Further analysis has also confirmed a more limited area that should be investigated for a Heritage Conservation Area.
10. **Floor Space Ratio** – The draft Master Plan previously provided an indicative ‘FSR range’ for the various building height zones recommended. Since March 2021, Council has undertaken more detailed floor space ratio testing to determine the most appropriate maximum floor space ratio for each site. The recommended maximum floor space ratio includes the sustainability bonus and incentive floor space for delivery of affordable housing, on-site infrastructure or employment-generating floor space. In the Planning Proposal, a separate ‘Incentive Floor Space Ratio Map’ will be prepared, to show sites that are required to provide the above in order to achieve the uplift on the Map. For other sites, receiving only a marginal uplift, the current maximum Floor Space Ratio Map will be amended.

It is noted that the floor space ratios expressed below would exclude underground floor space for supermarkets, community facilities and registered clubs (refer to Item 3 above).



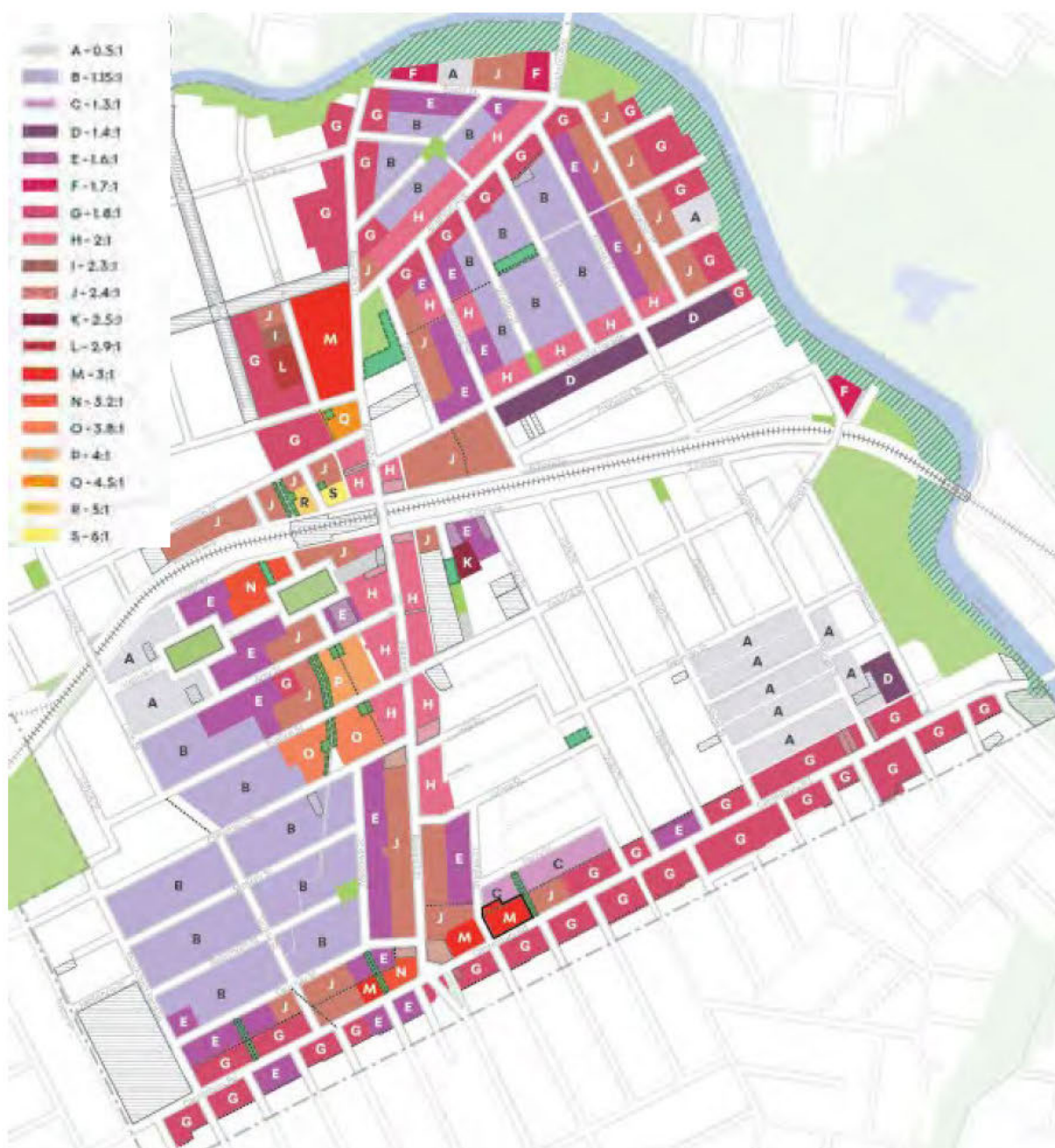
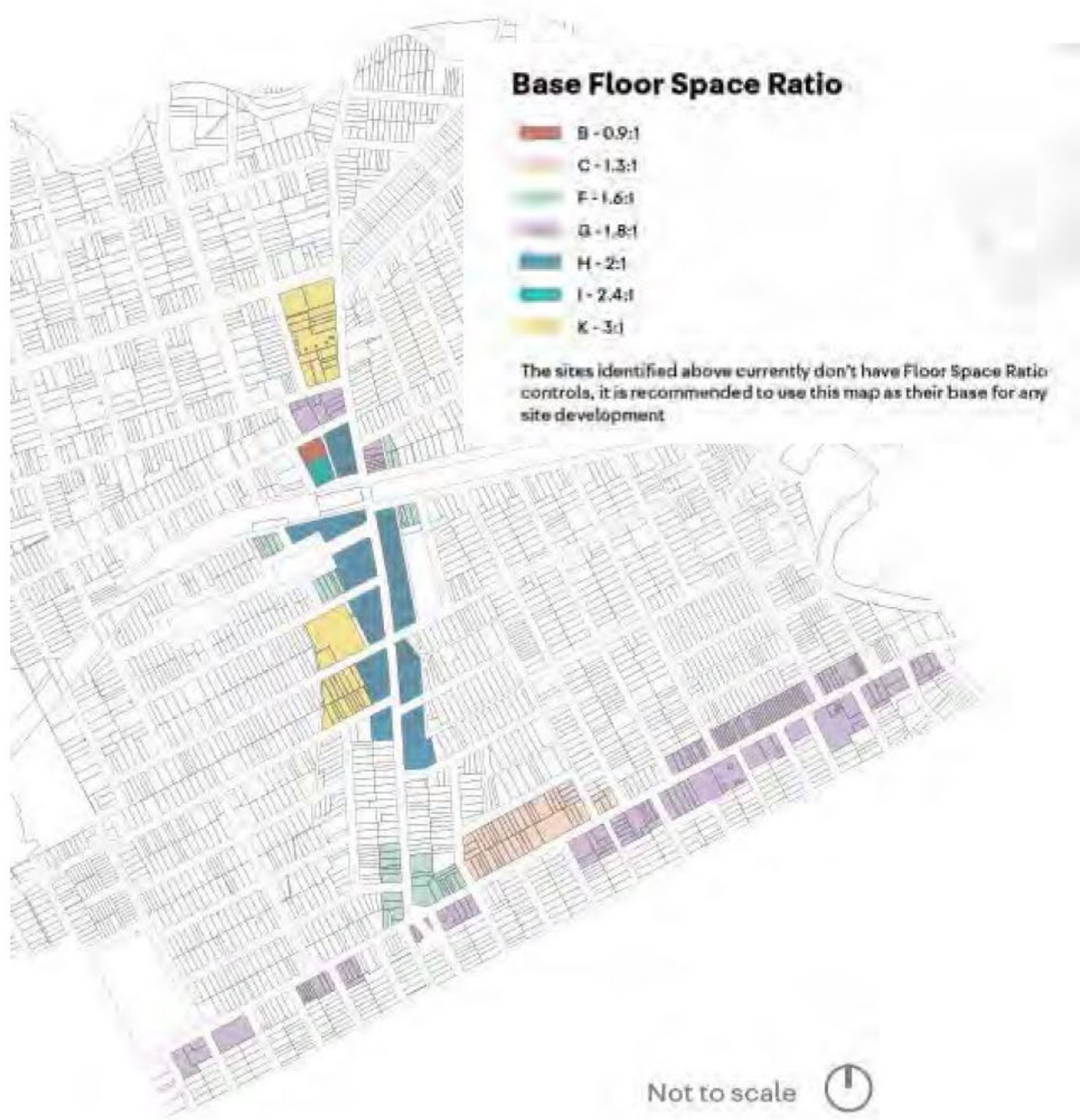


Figure 5. Proposed Maximum Floor Space Ratio.

11. **Base Floor Space:** The draft Plan noted that some areas of Campsie, namely the business zones, currently do not have an applicable maximum floor space ratio. This has the potential to result in poor built form outcomes, with few mechanisms for Council to control built form and regulate the distribution of density across a site. Modelling of these sites has been undertaken to establish a 'base FSR', to be applied to the 'Maximum Floor Space Ratio' Map. It is noted that for some of these sites, they may have access to the incentive height and floor space map (as set out above). The proposed base FSR map is provided below.



*Figure 6. Proposed Base Floor Space Ratio.*

## INTEGRATION OF APPLICANT-INITIATED PLANNING PROPOSALS

Council has been in receipt of a number of Planning Proposal applications within the Campsie Town Centre study area. Through the Master Planning Process, and under direction of an independent Probity Advisor, Council sought submissions from Planning Proposal Applicants in order to test these proposals and integrate the recommendations into the Master Plan and a forthcoming Planning Proposal. These Planning Proposals and the revised Master Plan recommendation for each is outlined below.



## 2-10 Harold Street

It is recommended that this site be integrated into the Campsie Town Centre Planning Proposal based on the recommendations of the Revised Master Plan, outlined below.

Current Controls			Planning Proposal / Early Engagement Submission			Revised Master Plan Recommendations		
Zoning	Height	Floor Space	Zoning	Height	Floor Space	Zoning	Height	Max Floor Space (with incentives)
R4 High Density Residential	11.5 (3 storeys)	0.9:1	R4 High Density Residential	15 storeys	3.6:1	R4 High Density Residential	8 storeys	2.5:1

Rationale for the Master Plan recommendation:

1. The Master Plan supports an uplift in density in this location, particularly given its location and proximity to transport, infrastructure, local services and amenities.
2. The Master Plan acknowledges the opportunity that amalgamation of this site brings to expand Harold Street Reserve northward due to the consolidation of driveways on this site.
3. The Applicant has proposed this as part of their Planning Agreement. The Master Plan recommends the expansion of Harold Street be funded through contributions, rather than solely by this development
4. The subject site is located within a block adjacent to a heritage item, and item recommended for further heritage investigation, being the Public and Catholic Schools to the west and south respectively, as well as the adjacent dwelling to the north. This, combined with other sites being constrained by strata or multiple ownership, creates a context for this block that is likely to remain largely at 2-5 storeys. The development of a 15 storey building in this location would result in a poor contextual relationship with the surrounding area. Eight (8) storeys allows for an appropriate transition in building height, and ensures that future development would be of a scale that is sympathetic to the character of immediately adjacent properties and their long term future potential
5. No change to the existing zoning is recommended.

## 76-90 Evaline Street and 21-23 Claremont Street

It is recommended that this site be integrated into the Campsie Town Centre Planning Proposal based on the recommendations of the Revised Master Plan, outlined below.

Current Controls			Planning Proposal / Early Engagement Submission			Revised Master Plan Recommendations		
Zoning	Height	Floor Space	Zoning	Height	Floor Space	Zoning	Height	Max Floor Space (with incentives)
R3 Medium Density and part R4 High Density Residential	8.5 metres (3 storeys)	0.5:1	B4 Mixed Use	42 metres (up to 12-13 storeys)	4.57:1	B4 Mixed Use	8-15 storeys	3.8:1

#### Rationale for the Master Plan recommendation:

1. The Master Plan supports an uplift in density in this location, particularly given its location and proximity to transport, infrastructure, local services and amenities.
2. This proposal also brings together multiple properties, and presents an opportunity for integrated renewal close to other key sites in Campsie, such as the Campsie Centre and Woolworths.
3. The Master Plan acknowledges the opportunity that amalgamation of this site brings to expand Harold Street Reserve northward due to the consolidation of driveways on this site.
4. The Master Plan recommends the provision of greenspace and a through-site link adjacent to the canal along the eastern boundary of this site.
5. The Master Plan supports an increase in height in this location to part 15 storeys and part 8 storeys to transition to the surrounding blocks to the west and south. This is as the context of the site will be to the west of a cluster of taller buildings on the nearby key sites.
6. The floor space ratio for this site is based on the desired street wall height and setback above the street wall to ensure an appropriate contextual relationship of the site with tall development to the east and lower scale development to the west. Achieving the FSR proposed for this site by the applicant would result in a level of bulk and scale that is inconsistent with the Masterplan intent for Campsie. This is based on design testing for this site and its role as a transition site. Notwithstanding, it is noted that the site is sloping, and this site may be capable of providing some underground floor space that is additional to the recommended floor space ratio.
7. The applicant proposed land use zoning is supported. This has been investigated through the Land Use Economics Study supporting the Master Plan, with the site having the potential to contribute to achieving the vision for increased jobs across the Campsie centre.

#### 124-142 Beamish Street

It is noted that a Planning Proposal for this site was submitted and withdrawn during the preparation of the Master Plan. Notwithstanding, analysis of this site has been undertaken due to the site being situated on Beamish Street, its proximity to the station, and the amalgamation of lots that has been presented.

Current Controls			Planning Proposal / Early Engagement Submission			Revised Master Plan Recommendations		
Zoning	Height	Floor Space	Zoning	Height	Floor Space	Zoning	Height	Max Floor Space (with incentives)
B2 Local Centre	21 metres (6 storeys)	No FSR control	B2 Local Centre	25 storeys / 86 metres	8:1	B4 Mixed Use	20 storeys	4.5:1



Rationale for the Master Plan recommendation:

1. The Master Plan supports an uplift in density in this location, particularly given its location and proximity to transport, infrastructure, local services and amenities.
2. This proposal also brings together multiple properties along Beamish Street and adjacent to it, and presents an opportunity for integrated renewal of those properties.
3. The Master Plan acknowledges the opportunity that amalgamation of this site brings to contribute to the activation of the northern end of Beamish Street, and opposite the proposed Cultural and Civic Hub on Council's land.
4. This site is currently not subject to an FSR control. Testing of an appropriate built form for this site at the current highest and best use for development in Campsie, being largely shop top housing, it is recommended that a maximum FSR of 1.8:1 be introduced.
5. An underlying intent of the Master Plan is to deliver a high quality town centre. Its future form and structure has been the subject of detailed design testing and on this basis the height proposed by the applicant is considered excessive for Campsie's context and desired future character. The Master Plan intends on encouraging a prevailing mid-rise scale for renewal areas of Campsie, being 3 to 8 storeys, with limited sites in strategic locations recommended for a height of 15-20 storeys. This site, given its size and ability for taller development to be accommodated consistent with the Intensification Strategy, is recommended for 20 storeys.
6. The applicant proposed FSR for this site, being approximately 8:1, has been tested and is considered unachievable on the subject site. The revised Master Plan recommends a maximum floor space ratio of 4.5:1, inclusive of the sustainability bonus and incentive floor space ratio provisions. This takes into consideration the desire for 5 storey development fronting Beamish Street, and the ability for the site to only accommodate one tower form. Two tower forms on this site would compromise the desired character of Beamish Street as a low-scale main street as the proposed design would require a nil setback for the entire height along Beamish Street. If a setback was accommodated, the two towers would be too close together to satisfy the requirements of the Apartment Design Guide. It is noted that the recommended FSR excludes the potential for underground floor space, subject to finalisation of that control.
7. The applicant proposed land use zoning is supported. This has been investigated through the Land Use Economics Study supporting the Master Plan, with the site having the potential to contribute to achieving the vision for increased jobs across the Campsie centre.

## Campsie RSL

It is recommended that this site be integrated into the Campsie Town Centre Planning Proposal based on the recommendations of the Revised Master Plan, outlined below.

Current Controls			Planning Proposal / Early Engagement Submission			Revised Master Plan Recommendations		
Zoning	Height	Floor Space	Zoning	Height	Floor Space	Zoning	Height	Max Floor Space (with incentives)
B2 Local Centre / SP2 Infrastructure and R4 High Density Residential	14-18 metres (up to 4-5 storeys)	1.4:1 on western part of site, no limit on eastern part of the site	B2 Local Centre	23-25 storeys (up to 80 metres)	4:1	B4 Mixed Use	5-16 storeys	3.2:1.

### Rationale for the Master Plan recommendation:

1. The Master Plan supports an uplift in density in this location, particularly given its location and proximity to transport, infrastructure, local services and amenities.
2. This proposal relates to a large site in single ownership with opportunity for renewal that contributes to the improvement and activation of the precinct around Anzac Park.
3. Part of this site is currently not subject to an FSR control. Based on testing of an appropriate built form for this component of the site, taking into consideration the current land use and height controls, it is recommended that a maximum FSR of 1.6:1 be introduced.
4. In light of the long term planning intent for Campsie, the height proposed by the applicant has been considered too tall for Campsie's context and desired future character. The Master Plan intends on encouraging a prevailing mid-rise scale for renewal areas of Campsie, being 3 to 8 storeys, with limited sites in strategic locations recommended for a height of 15-20 storeys. In addition, development on this site has the potential to impact solar access to Anzac Park. To address this, the Master Plan seeks to retain at least 5 hours of sun access to 50% the park on 21 June (the winter solstice). Therefore, based on modelling of this site to achieve the desired character of this precinct and protect solar access to Anzac Park, the revised Master Plan recommends three height controls for this site, being 5 storeys at the southern end of the site, 8 storeys to the eastern end of the site and 16 storeys at the northern end of the site.
5. The applicant proposed FSR for this site, being approximately 4:1, has been tested and is considered unachievable on the subject site without a built form that would detrimentally impact on the character of this precinct and the desired solar access to Anzac Park. The revised Master Plan recommends a maximum floor space ratio of 3.2:1, inclusive of the sustainability bonus and incentive floor space ratio provisions. It is noted that the recommended FSR excludes the potential for underground floor space, subject to finalisation of that control.
6. The applicant proposed land use zoning of B2 Local Centre is inconsistent with the proposed zoning for the Town Centre core of Campsie. A B4 Mixed Use Zoning is recommended by the Master Plan, which is consistent with Campsie's Strategic Centre role. The B4 zone will allow for an expanded range of uses permissible on the subject site.



## 445-449 Canterbury Road, Campsie

It is recommended that this site is not integrated into the Campsie Town Centre Planning Proposal, so that it can continue to progress as a stand-alone Planning Proposal given that the proposal has progressed ahead of the draft Master Plan. Further built form analysis and traffic and transport analysis is required based on the potential for specialised, employment-generating land uses on this site, as the Planning Proposal is based on a significantly scaled health services facility, which requires detailed analysis beyond the scope of this master plan. Notwithstanding this, the Master Plan provides strategic context and preliminary recommendations for this site based on its context within the Canterbury Road Corridor and proximity to the Campsie Medical Cluster.

Current Controls			Planning Proposal / Early Engagement Submission			Revised Master Plan Recommendations		
Zoning	Height	Floor Space	Zoning	Height	Floor Space	Zoning	Height	Max Floor Space (with incentives)
B6 Enterprise Corridor	12 metres (3-4 storeys)	No FSR control	B6 Enterprise Corridor	56 metres (15-18 non-residential floors)	Nil	B6 Enterprise Corridor	10 storeys	3:1

### Rationale for the Master Plan recommendation:

1. The Master Plan supports an uplift in density in this location, particularly given its proximity to the Canterbury Road / Beamish Street node and relative proximity to the Campsie Medical Cluster, anchored by Canterbury Hospital.
2. Large scale redevelopment of this site has the opportunity to significantly enhance the offering of specialised employment in Campsie.
3. This site is currently not subject to an FSR control. Based on testing of an appropriate built form, taking into consideration the current land use and height controls, it is recommended that a maximum FSR of 1.3:1 be introduced.
4. The height proposed by the applicant exceeds the recommended Master Plan height. The impacts of taller development on this site, need to be balanced with the potential overshadowing impacts to the southern side of Canterbury Road. Notwithstanding, specialised uses on this site have the potential to contribute to the Campsie Medical Cluster, anchored by Canterbury Hospital.
5. It is recommended the B6 Enterprise Corridor zoning be retained on this site.

## PLANNING PROPOSAL FOR IMPLEMENTATION OF THE REVISED DRAFT CAMPSIE TOWN CENTRE MASTER PLAN

### Explanation of Intended Outcomes of the Campsie Town Centre Planning Proposal

Subject to Council's endorsement, the next step in the process is to submit a Planning Proposal that will implement the 'Actions' of the revised draft Master Plan to translate the vision of the planning document into new and amended planning controls in the draft Canterbury Bankstown Local Environmental Plan 2021. The Planning Proposal will be prepared by Council in accordance with the Department of Planning, Industry and Environment (the Department) *A Guide to Preparing Local Environmental Plans*.



Council's assessment findings of the proposed amendments to the draft Canterbury Bankstown Local Environmental Plan 2021 (CBLEP 2021) indicate the proposal demonstrates strategic and site-specific merit to proceed to the Gateway (refer to **Attachment C Assessment Findings**). Subject to receiving a Gateway Determination from the Department, Council will exhibit the Planning Proposal in accordance with the Gateway conditions.

Council has progressed the finalisation of the draft Consolidated Canterbury Bankstown Local Environmental Plan 2021 (CBLEP 2021) which has been publicly exhibited and is with the Department for making. To avoid any doubt, this application seeks to amend the draft CBLEP 2021.


The Campsie Town Centre Planning Proposal will include amendments to the draft CBLEP 2021 as detailed in the table below.

*Description of proposed LEP amendments – proposed provisions and intended outcomes*

Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
Amended LEP Maps	<p><u>Land Zoning Map</u> Amend the Land Zoning Map as follows:</p> <ul style="list-style-type: none"> <li>Remove the B2 Local Centre Zoning from along the core Campsie Town Centre and replace with an expanded B4 Mixed Use Zone to provide opportunities for renewal and redevelopment for a diverse range of employment generating uses and facilitate delivery of new housing.</li> <li>Rezoning R3 Medium Density Zone areas along the southern side of Canterbury Road to R4 High Density Residential Zone to facilitate ground floor level streetscape activation via shop top housing development.</li> <li>Rezoning land along Canterbury Road and Fletcher Street to the west of Beamish Street from R3 and R4 to a mix of B2 Local Centre, B4 Mixed Use Zone and B6 Enterprise Corridor Zones to facilitate employment generating uses and clustering of health services and allied uses located near Canterbury Hospital.</li> <li>Rezoning the R3 Medium Density Residential zoned land to the west of Beamish Street and to the north eastern area to the Campsie Town Centre to R4 High Density Residential Zone to accommodate increased opportunities for new housing in areas most capable of supporting such growth due to proximity to infrastructure and access to public open space.</li> <li>Establish two 'Special Character' areas by rezoning two areas of R3 Medium Density Residential zoned land to R2 Low Density Zone. The intent is to retain the character of the single detached mainly inter-war period housing in these two areas and for future change to be sensitive and responsive to that character. These areas are:               <ul style="list-style-type: none"> <li>Carrington Square and surrounding properties.</li> <li>Gould Street, Redman Street and Wonga Street, near Tasker Park.</li> </ul> </li> </ul>



Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
	<ul style="list-style-type: none"> <li>Rezoning seven properties to RE1 Public Recreation Zone to provide opportunities for additional public open space in new locations or expand the size of existing public open space.</li> </ul> <p>A Land Use Zoning Map is to be prepared based on the recommended Land Use Zoning Map at Objective 3.1 of the revised draft CTCMP at <b>Attachment A</b>.</p> <p><u>Floor Space Ratio Map</u></p> <p>Amend the Floor Space Ratio Maps to include changes to FSR across the Campsie Town Centre to reflect changes to residential and business zonings and provide for new jobs and housing. The proposed changes to the FSR maps have been informed by development feasibility and viability testing and urban design modelling to account for setbacks, likely future amalgamation patterns and solar access. The FSR maps will remove FSR from land that is proposed to be zoned RE1 Public Recreation.</p> <p>The FSR Map is to be amended to include the proposed 'base Floor Space Ratios' provided at Objective 9.1 of the revised draft CTCMP at <b>Attachment A</b>. In addition, further amendments may be made based on the recommended 'Proposed Floor Space Ratio' Map at Objective 9.1 of the Revised draft CTCMP at <b>Attachment A</b>. These changes will only occur where sites are not proposed to receive substantial uplift in floor space ratio (refer to Incentive Floor Space Ratio Map below).</p> <p><u>Height of Buildings Map</u></p> <p>Amend the Height of Buildings Map to increase maximum building heights in key locations as set out by the Campsie Maser Plan Intensification Strategy Map which generally includes land clustered around the Campsie Railway Station, along Canterbury Road, the Beamish Street/Canterbury Road intersection and the north eastern section of Campsie Town Centre. Building heights are proposed to be reduced in certain areas to reflect 'downzoning' such as land zoned from R4 High Density Residential to R3 Medium Density Residential zone. Building heights are proposed to be removed from land proposed to be zoned RE1 Public Recreation Zone. The intended outcome of the changes to the Height of Buildings Map is to align maximum building heights with the maximum FSR achievable on the site.</p> <p>It is noted that not all recommended height controls, based on the 'Proposed Building Heights' map at Objective 9.1 of the revised draft CTCMP at <b>Attachment A</b> will amend the Maximum Building Heights Map. Where sites are receiving substantial uplift in density, the height and floor space will be reflected on the Incentive Height and Floor Space Ratio Map, discussed below.</p>

Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
	<p><u>Incentive Floor Space Ratio Map, and Incentive Height of Buildings Map</u></p> <p>Introduce an Incentive Floor Space Ratio Map and Incentive Height of Buildings Map. These maps will identify land that will be subject to the proposed <i>'Clause 6.XX – Incentive height of buildings and floor space in Bankstown and Campsie'</i>. Refer below for the proposed clause intent. These Maps will set out the maximum height and floor space for each site (excluding the sustainability bonus) for sites subject to the proposed <i>'Clause 6.XX – Incentive height of buildings and floor space in Bankstown and Campsie'</i>.</p> <p><u>Land Reservation Acquisition Map</u></p> <p>Amend the Land Reservation Acquisition Map to include new properties at 7 Bellombi Street, 16, 17 and 18 Dryden Street, 19 and 21 Burns Street, and a portion of 5 East Parade, Campsie to be acquired by Council for provision of public open space (zoned RE1 Public Recreation).</p> <p>A very narrow portion of 15 and 17 Nowra Street and 6 East Parade is currently shown on the Land Reservation Acquisition Map. This land will now be delivered to Council through land dedication rather than land acquisition. The sites will however remain on the Land Reservation Acquisition Map as the intent is for the sites to be given to Council for the purpose of local open space.</p> <p>The Draft Campsie Town Centre Master Plan does not propose the classification or reclassification of public land. Classification of public land may occur following land acquisition or land dedication of land along the Cooks River.</p>  <p><i>Figure 7. Narrow portion of 15 and 17 Nowra Street and 6 East Parade is currently shown on the Land Reservation Acquisition Map</i></p>



Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
	<p>Refer <b>Attachment E</b> for the existing and proposed Land Reservation Acquisition Map.</p> <p><u>Special Provisions Map</u>  Amend the Special Provisions Map to identify the Campsie Town Centre as 'Area XX' (number to be confirmed at LEP Amendment finalisation stage) to give effect to and reference new LEP clauses including delivery of infrastructure on individual sites in the form of open spaces, through site links or foreshore land, and apply a sustainability incentive scheme which incentivises sustainability excellence in development.  This map is to be prepared prior to lodgement of the Planning Proposal for Gateway.</p> <p><u>Foreshore Building Line Map</u>  Amend the Foreshore Building Line Map to provide a new foreshore building line measured from the mean high water mark of Cooks River along the landside area of Cooks River within the Campsie Town Centre. The purpose of the Foreshore Building Line will be to restrict the type of development that can be carried out within the Foreshore Building Area. The only development permitted within the Foreshore Building Area will include boat sheds, sea retaining walls, wharves, slipways, jetties, waterway access stairs, swimming pools, fences, cycleways, walking trails, picnic facilities or other recreation facilities (outdoors).</p> <p>This map is to be prepared prior to lodgement of the Planning Proposal for Gateway.</p> <p><u>Active frontages map</u>  The following properties will be added to the 'Active Frontages' Map to reflect the desire to activate the Cooks River Foreshore and surrounding precinct, and the Canterbury Road/Beamish Street node. Properties to be included on the Active Frontages Map:</p> <ul style="list-style-type: none"> <li>• 7 Beamish St, Campsie</li> <li>• 9 Beamish St, Campsie</li> <li>• 11 Beamish St, Campsie</li> <li>• 15 Beamish St, Campsie</li> <li>• 104-106 Brighton Avenue, Campsie</li> <li>• 108 Brighton Avenue, Campsie</li> <li>• 110 Brighton Avenue, Campsie</li> <li>• 112 Brighton Avenue, Campsie</li> <li>• 114 Brighton Avenue, Campsie</li> <li>• 116 Brighton Avenue, Campsie</li> <li>• 118 Brighton Avenue, Campsie</li> <li>• 120-126 Brighton Avenue, Campsie</li> <li>• 212 Brighton Ave, Campsie</li> </ul>

Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
	<ul style="list-style-type: none"> <li>• 214 Brighton Ave, Campsie</li> <li>• 216 Brighton Ave, Campsie</li> <li>• 220 Brighton Ave, Campsie</li> <li>• 222 Brighton Ave, Campsie</li> <li>• 224 Brighton Ave, Campsie</li> <li>• 7 Clissold Parade, Campsie</li> <li>• 9 Clissold Parade, Campsie</li> <li>• 11 Clissold Parade, Campsie</li> <li>• 13 Clissold Parade, Campsie</li> <li>• 15 Clissold Parade, Campsie</li> <li>• 17 Clissold Parade, Campsie</li> <li>• 412-414 Beamish Street, Campsie</li> <li>• 416-422 Beamish Street, Campsie</li> <li>• 499 Canterbury Road, Campsie</li> <li>• 501 Canterbury Road, Campsie</li> <li>503-505 Canterbury Rd, Campsie</li> </ul> <p><u>Key Sites Map – New Map</u> Remove land identified as “A” on the Key Sites Map from B5 Business Development Zone as per the Canterbury Road Review recommendation. The intent of this amendment is to remove residential accommodation as a permitted use from land zoned B5 Business Development along Canterbury Road. This change is intended to focus residential development closer to and around Campsie Railway Station and reinforces the current and future role of Canterbury Road as an enterprise corridor.</p> <p>This map is to be prepared prior to lodgement of the Planning Proposal for Gateway.</p>
<b>Amend Land Use Table – Zone B4 Mixed Use</b>	The current Zone B4 Land Use Table refers to Bankstown only. It is proposed to amend the existing objectives to include reference to Campsie and to strengthen Campsie’s role as an employment centre and as a lifestyle and medical precinct.
<b>Amended Clause 4.4 – Floor Space Ratio</b>	Amend clause to encourage lot consolidation and the delivery of functional and efficient floorplates in the Campsie Town Centre.
<b>Amended Clause 4.4A – Additional gross floor area for more sustainable development in Bankstown and Campsie</b>	Amend Clause 4.4A to include reference to Campsie Town Centre in the clause title and to apply to the Campsie Town Centre. The intended outcome of the clause is to incentivise new development in the Campsie Town Centre to achieve best practice sustainability outcomes and building efficiency measures by granting bonus FSR of up to 0.5:1 for development that meets the criteria outlined in the clause. This will be achieved through the following measures: 1. Identifying land on the Floor Space Ratio Map that will be subject to this clause.



Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
	<ol style="list-style-type: none"> <li>2. Apply the clause to only a specific range of development types including residential flat buildings, commercial premises, tourist accommodation and mixed use development.</li> <li>3. The new development will not be connected to natural gas, include installation of a solar PV system and for residential development, achieve energy and water efficiency targets as set out in the Master Plan and supporting Sustainability Study.</li> <li>4. For certain new development including office premises, shopping centres/retail development or new hotels it will be a requirement that the buildings achieve specific greenhouse gas and water efficiency ratings as set out in the Master Plan and supporting Sustainability Study.</li> <li>5. All other development not covered by the above criteria will be required to demonstrate exceeding the Section J 'Energy Efficiency' National Construction Code Building Code of Australia by 15%.</li> <li>6. Setting out the allowable bonus floor space ratio, being up to an additional 0.25:1 if the total resultant FSR of development will be 1.5:1 or less, or 0.5:1 if the total resultant FSR of development will be more than 1.5:1. The bonus FSR may be applied above the maximum FSR permitted on the 'Maximum Floor Space Ratio' Map, or the 'Incentive Floor Space Ratio Map'.</li> </ol>
<b>Amend Clause 6.12 - Restrictions on development in Zone B4 Mixed Use*</b>	<p>Amend Clause 6.12 as follows:</p> <ol style="list-style-type: none"> <li>(e) To identify land within the Campsie Town Centre that this clause will apply as 'Area XX' on the Special Provisions Map (numbering to be confirmed at LEP amendment finalisation stage).</li> <li>(f) Requiring the ground floor of mixed-use developments in Campsie Town Centre area identified in the Special Provisions Map to be used for non-residential purposes.</li> <li>(g) Introduce a 'no net loss of employment floor space' clause. Sites that have more than the minimum required employment floor space requirement within existing development, the redevelopment will be required to accommodate the equivalent quantum of employment floor space as a minimum.</li> </ol>
<b>Introduce Clause 6.XX – Incentive height of buildings and floor space in Bankstown and Campsie</b>	<p>Introduce a Height and FSR incentive clause to incentivise the provision of on-site community infrastructure, affordable housing, and employment-generating uses. The intent of the new clause is to allow additional building height or additional floor space, or both, for development that:</p> <ul style="list-style-type: none"> <li>• Provides community infrastructure necessary for Campsie Town Centre and considers the nature and value of that infrastructure, or</li> </ul>



Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
	<ul style="list-style-type: none"> <li>• The provision of affordable housing that comprises 1%, 2% or 3% of the total development yield for Development Applications lodged 12 months, 12-24 months and after 24 months of the date of the gazettal of the clause in the draft CBLEP 2021, or</li> <li>• 50% of the total Gross Floor Area is for employment generating uses, and where applicable, provides community infrastructure as noted above.</li> </ul> <p>The provision of on-site infrastructure will be included in an adopted Council document (such as the DCP) and include maps showing the location of required infrastructure as identified by Council. Development that is located on sites that are identified by Council as required to provide on-site infrastructure will benefit from increased building height and FSR bonuses to offset the cost of providing the on-site infrastructure. Such sites would not be required to contribute to Affordable Housing.</p> <p>In addition, development that proposes more than 50% employment-generating uses, will also not be required to contribute to Affordable Housing. Employment-generating uses will include centre-based child care facilities; commercial premises; community facilities; educational establishments; entertainment facilities; function centres; health services facilities; hotel or motel accommodation; information and education facilities; passenger transport facilities; public administration buildings; recreation facilities (indoor); registered clubs; residential aged care facilities; serviced apartments, tourist and visitor accommodation.</p>
<p><b>Introduce a Tall Buildings Design Requirements Clause*</b></p>	<p>Introduce a Tall Building Clause that will apply to 'tall buildings', being buildings over 25m in the Campsie Town Centre, that must have a minimum frontage of 30m and 1,500m<sup>2</sup> in total site area.</p> <p>The intended outcome of the clause is to encourage good building design outcomes of tall buildings including at the ground level by including clause objectives that will require the ground floor level of tall buildings to have active street frontages, the tower design to be compatible with its context and do not adversely affect the amenity of public places. The draft DCP amendment that will apply to the Campsie Town Centre will include reference to the clause and provide development controls to support the objectives and development standards which will have greater statutory weight to seek high design quality tall buildings. These controls will implement the recommendations of the Tall Buildings Study.</p>

Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
<b>Introduce an Underground Floor Space Ratio Exclusion Clause*</b>	<p>Due to the potential to develop limited uses in basement/underground settings, it is proposed that developments be permitted to provide underground floor space in addition to the maximum floor space ratio and floor space delivered as part of incentive scheme. This clause will include:</p> <ul style="list-style-type: none"> <li>• Objectives to ensure retaining an active and safe streetscape and public domain around the site.</li> <li>• Limitations on the type of uses (such as supermarkets, retail, theatres, community facilities, entertainment facilities, registered clubs and the like).</li> <li>• Limitations on minimum lot size to which development can apply this clause.</li> <li>• Mandating minimum floor to ceiling heights for such uses of 3.7 metres, and ensuring the upper most basement levels closest to the Ground Floor are used for underground floor space.</li> <li>• Application of this clause in areas subject of limited car parking controls.</li> </ul> <p>This may require identification of areas to which this clause may apply on the Special Provisions Map.</p> <p>This clause will specify that underground floor space will be permitted in addition to the maximum floor space ratio prescribed to a site on the Floor Space Ratio or Incentive Floor Space Ratio Maps.</p>
<b>Introduce a Foreshore Access Clause</b>	<p>Due to the intent for the development of sites along the Cooks River Foreshore to dedicate land for public access to the foreshore, it is intended that a Foreshore Access Clause be introduced to affirm the objective of enhancing public access to the foreshore and ensuring land between the foreshore building line and the Cooks River is intended as public land.</p> <p>This will assist in supporting the incentive height and floor space provisions with respect to sites along the Cooks River. Council will consider developing appropriate planning mechanisms within the LEP and DCP to provide certainty that the intended outcomes of this clause are delivered during the development application stages.</p>
<b>Amend Schedule 1 – Additional Permitted Uses</b>	<p>Add 'café', 'restaurant' and 'retail' uses as an Additional Permitted Use to the following properties for activation of the Cooks River foreshore and surrounding precinct:</p> <ul style="list-style-type: none"> <li>• 7 Beamish St, Campsie</li> <li>• 9 Beamish St, Campsie</li> <li>• 11 Beamish St, Campsie</li> <li>• 15 Beamish St, Campsie</li> <li>• 104-106 Brighton Avenue, Campsie</li> <li>• 108 Brighton Avenue, Campsie</li> <li>• 110 Brighton Avenue, Campsie</li> </ul>



Proposed LEP Amendment	Explanation of proposed provisions and intended outcomes
	<ul style="list-style-type: none"> <li>• 112 Brighton Avenue, Campsie</li> <li>• 114 Brighton Avenue, Campsie</li> <li>• 116 Brighton Avenue, Campsie</li> <li>• 118 Brighton Avenue, Campsie</li> <li>• 120-126 Brighton Avenue, Campsie</li> <li>• 212 Brighton Ave, Campsie</li> <li>• 214 Brighton Ave, Campsie</li> <li>• 216 Brighton Ave, Campsie</li> <li>• 220 Brighton Ave, Campsie</li> <li>• 222 Brighton Ave, Campsie</li> <li>• 224 Brighton Ave, Campsie</li> <li>• 7 Clissold Parade, Campsie</li> <li>• 9 Clissold Parade, Campsie</li> <li>• 11 Clissold Parade, Campsie</li> <li>• 13 Clissold Parade, Campsie</li> <li>• 15 Clissold Parade, Campsie</li> <li>• 17 Clissold Parade, Campsie</li> </ul>
<b>Amend Schedule 2 – Exempt Development</b>	Add a new subclause in Schedule 2 – Exempt Development to allow late night trading in B4 Mixed Use Zone for a range of uses without requiring development consent of Council. The amendment to Schedule 2 will specify the types of uses that will be subject to this clause.

*\*Note: Council is considering including these clauses under a single consolidated LEP clause to apply to only land within the Strategic Centres of Campsie and Bankstown. While the final structure will be resolved post-Gateway the intent of these clauses is not altered.*

### **Development Control Plan Amendment for Campsie Town Centre**

Council intends to prepare a comprehensive set of DCP amendments to the consolidated Canterbury Bankstown DCP 2021 to support the Campsie Town Centre Planning Proposal. The draft DCP amendment will include specific controls relating to built form, design and materiality, local character, setbacks, landscaping and tree canopy, sustainability, building performance, open space and design excellence and a range of other controls identified in the Campsie City Centre Master Plan and supporting studies.

Council intends to place the draft DCP amendment on public exhibition alongside the Planning Proposal, should the proposal receive a Gateway determination.

-END-



**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 18 APRIL 2023**

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**PRESENT:** Mayor, Councillor Asfour  
Councillors Abouraad, Akter, Cahill, Coorey, Downey, El-Hayek, Harika, Ishac,  
Nguyen, Raffan, Saleh OAM, Waiba, Walsh and Zakhia

**APOLOGIES** Nil

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**HIS WORSHIP THE MAYOR DECLARED THE MEETING OPEN AT 6.43 P.M.**

**ACKNOWLEDGEMENT OF COUNTRY**

THE MAYOR, ACKNOWLEDGED THE TRADITIONAL OWNERS OF THE LAND WHERE WE ARE MEETING TODAY THE DARUG (DARAG, DHARUG, DARUK AND DHARUK) AND THE EORA PEOPLES, AND PAID RESPECT TO THEIR ANCIENT CULTURE AND THEIR ELDERS PAST AND PRESENT.

**SECTION 1: CONFIRMATION OF MINUTES**

**(399)**

**CLR. ZAKHIA:/CLR. CAHILL**

RESOLVED that the minutes of the Ordinary Council Meeting held on 28 March 2023 be adopted.

- CARRIED

CLR COOREY REQUESTED HER NAME BE RECORDED AS HAVING VOTED AGAINST THIS RESOLUTION.

**SECTION 2: LEAVE OF ABSENCE**

Nil

**SECTION 3: DECLARATIONS OF PECUNIARY INTEREST OR NON-PECUNIARY CONFLICT OF INTEREST**

In respect of Item 4.3 – Local Community Based Donations, Clr El-Hayek declared a Non Pecuniary, Non-significant Conflict of Interest due to a previous working relationship with one grant recipient, and as such, he will vacate the chamber taking no part in debate.

In respect of Item 4.3 – Local Community Based Donations, Clr Asfour declared a Non Pecuniary, Non-significant Conflict of Interest due to a relationship with one of the grant recipients, and as such, he will vacate the chamber taking no part in debate.

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 18 APRIL 2023**

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**SECTION 4: MAYORAL MINUTES**

**ITEM 4.1 LOCAL GOVERNMENT SUMMIT**  
**(400) CLR. ASFOUR**

RESOLVED that Council write to the recently appointed Minister for Local Government, The Hon. Ron Hoenig MP, congratulating him on his appointment and calling on him to convene a Local Government Summit, to examine the sustainable funding of the Local Government sector to ensure its viability and future.

- CARRIED

**ITEM 4.2 DUNC GRAY VELODROME, BASS HILL**  
**(401) CLR. ASFOUR**

RESOLVED that Council write to the newly appointed Minister for Sport, The Hon. Steve Kamper MP, congratulating him on his appointment and asking him for whatever assistance he can give in relation to funding and the future of the Velodrome site.

- CARRIED

**ITEM 4.3 LOCAL COMMUNITY BASED DONATIONS**

IN RESPECT OF ITEM 4.3 – LOCAL COMMUNITY BASED DONATIONS, CLR EL-HAYEK DECLARED A NON PECUNIARY, NON-SIGNIFICANT CONFLICT OF INTEREST DUE TO A PREVIOUS WORKING RELATIONSHIP WITH ONE GRANT RECIPIENT, AND AS SUCH, HE VACATED THE CHAMBER TAKING NO PART IN DEBATE.

IN RESPECT OF ITEM 4.3 – LOCAL COMMUNITY BASED DONATIONS, CLR ASFOUR DECLARED A NON PECUNIARY, NON-SIGNIFICANT CONFLICT OF INTEREST DUE TO A RELATIONSHIP WITH ONE OF THE GRANT RECIPIENTS, AND AS SUCH, HE VACATED THE CHAMBER TAKING NO PART IN DEBATE.

HIS WORSHIP THE MAYOR CLR ASFOUR AND CLR EL-HAYEK TEMPORARILY VACATED THE CHAMBER AT 6.50 PM.

THE DEPUTY MAYOR CLR RAFFEN ASSUMED THE CHAIR.

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 18 APRIL 2023**

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**(402)**

**CLR. RAFFAN**

RESOLVED that

1. Council support a donation of \$1,000.00 to the Bankstown Sports Little Athletics Centre Incorporated to support Filtomas Finekifolau's representation at the 2023 Chemist Warehouse Australian Junior Athletics Championships.
2. Council support a donation of \$2,200.00 towards the Australian International Multicultural (AIM) Association Business Awards on the 19 May 2023.
3. Council support a fee waiver for AusRelief for the ground hire of Parry Park on the 19 May 2023 of \$508.00.
4. Council support a fee waiver for Community Minds Inc. for the hire of 'Courthouse Reserve' on 20 April 2023, of \$156.00.

- CARRIED

HIS WORSHIP THE MAYOR AND CLR EL-HAYEK RETURNED TO THE CHAMBER AT 6.52PM.

HIS WORSHIP THE MAYOR RESUMED THE CHAIR.

**SECTION 5:**

**PLANNING MATTERS**

Nil

**SECTION 6:**

**POLICY MATTERS**

Nil

**SECTION 7:**

**GOVERNANCE AND ADMINISTRATION MATTERS**

**ITEM 7.1**

**CASH AND INVESTMENT REPORT AS AT 31 MARCH 2023**

**(403)**

**CLR. WALSH:/CLR. ABOURAAD**

RESOLVED that

1. The Cash and Investment Report as at 31 March 2023 be received and noted.

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 18 APRIL 2023**

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2. The Certification by the Responsible Accounting Officer incorporated in this report, be adopted.

- CARRIED

CLR RAFFAN TEMPORARILY VACATED THE CHAMBER AT 6.52 PM AND RETURNED AT 6.54 PM.

AT THIS STAGE OF THE MEETING (6.54 PM), IN ACCORDANCE WITH CLAUSE 15.4 OF THE CODE OF MEETING PRACTICE, HIS WORSHIP THE MAYOR ISSUED A FIRST WARNING TO CLR COOREY FOR AN ACT OF DISORDER.

**SECTION 8: SERVICE AND OPERATIONAL MATTERS**

Nil

**SECTION 9: COMMITTEE REPORTS**

**(404) CLR. HARIKA:/CLR. ZAKHIA**

RESOLVED that in accordance with Council's Code of Meeting practice, Council adopts all the recommendations of the Committee Reports; 9.1, 9.2, 9.3, 9.4, 9.5 and 9.6.

- CARRIED

**ITEM 9.1 MINUTES OF THE ARTS & CULTURE ADVISORY COMMITTEE MEETING HELD ON 15 MARCH 2023**

**(405) CLR. HARIKA:/CLR. ZAKHIA**

RESOLVED that the minutes of the Arts & Culture Advisory Committee meeting held on 15 March 2023 be endorsed.

- CARRIED



**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 18 APRIL 2023**

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- ITEM 9.2**                      **MINUTES OF THE COMMUNITY SAFETY ADVISORY COMMITTEE MEETING HELD ON 16 MARCH 2023**
- (406)**                        **CLR. HARIKA:/CLR. ZAKHIA**
- RESOLVED that the minutes of the Community Safety Advisory Committee meeting held on 16 March 2023 be endorsed.
- CARRIED
- 
- ITEM 9.3**                      **MINUTES OF THE YOUTH ADVISORY COMMITTEE MEETING HELD ON 20 MARCH 2023**
- (407)**                        **CLR. HARIKA:/CLR. ZAKHIA**
- RESOLVED that the minutes of the Youth Advisory Committee meeting held on 20 March 2023 be endorsed.
- CARRIED
- 
- ITEM 9.4**                      **MINUTES OF THE ENVIRONMENT ADVISORY COMMITTEE MEETING HELD ON 22 MARCH 2023**
- (408)**                        **CLR. HARIKA:/CLR. ZAKHIA**
- RESOLVED that the minutes of the Environment Advisory Committee meeting held on 22 March 2023 be endorsed.
- CARRIED
- 
- ITEM 9.5**                      **MINUTES OF THE AUDIT RISK AND IMPROVEMENT COMMITTEE MEETING HELD 29 MARCH 2023**
- (409)**                        **CLR. HARIKA:/CLR. ZAKHIA**
- RESOLVED that
1.     The recommendations contained within the minutes of the Audit Risk and Improvement Committee meeting held on 29 March 2023, be adopted;
  2.     The revised ARIC Charter be adopted by Council;

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 18 APRIL 2023**

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3. The ARIC's annual work plan be noted.
4. The ARIC'S annual work plan be endorsed by Council;
5. The ARIC's strategic work plan be noted.
6. The ARIC's strategic work plan by endorsed by Council; and
7. The contents of the ARIC's annual report to Council be noted.

- CARRIED

**ITEM 9.6**                      **MINUTES OF THE TRAFFIC COMMITTEE MEETING HELD ON 11 APRIL 2023**  
**(410)**                        **CLR. HARIKA:/CLR. ZAKHIA**

RESOLVED that the recommendations contained in the minutes of the Canterbury-Bankstown Council Traffic Committee meeting held on 11 April 2023, be adopted.

- CARRIED

**SECTION 10:**                      **NOTICE OF MOTIONS & QUESTIONS WITH NOTICE**

**ITEM 10.1**                      **STATUS OF PREVIOUS NOTICES OF MOTION - APRIL 2023**  
**(411)**                        **CLR. EL-HAYEK:/CLR. RAFFAN**

RESOLVED that the information be noted.

- CARRIED

**ITEM 10.2**                      **INTERIM HERITAGE ORDER - ST PAUL'S ANGLICAN CHURCH - CHAPEL ROAD,**  
**(412)**                        **BANKSTOWN**  
**CLR. COOREY:/CLR. ZAKHIA**

RESOLVED that the matter be deferred for onsite inspection and briefing and a further report be provided to the Council meeting on 27 June 2023.

- CARRIED

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 18 APRIL 2023**

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**ITEM 10.3**                      **PLANNING PROPOSAL FOR UNWIN STREET PROPERTIES**  
**(413)**                              **CLR. COOREY:/CLR. ISHAC**

RESOLVED that Council ask the Minister to initiate an emergency Planning Proposal to rezone the following lands (and their associated lots) from Low Density Residential (R2) to Public Recreation (RE1):

- 14, 16 & 18 Unwin Street Earwood;
- 16 - 18 Bayview Avenue, Earwood;
- 2 Unwin Street, Earwood.

- CARRIED

**ITEM 10.4**                      **TARAWIH - RAMADAN NIGHTS LAKEMBA 2023**  
**(414)**                              **CLR. EL-HAYEK:/CLR. SALEH OAM**

RESOLVED that Council assists the local community to hold Tarawih (Ramadan Prayers) in Haldon Street on Wednesday 19 April 2023.

- CARRIED

**SECTION 11:**                      **CONFIDENTIAL SESSION**

**(415)**                              **CLR. ISHAC:/CLR. DOWNEY**

RESOLVED that in accordance with Section 10A(2) of the Local Government Act, 1993, the Public and the Press be excluded from the meeting to enable Council to determine Item 11.1 in confidential session for the reasons indicated:

Item 11.1 T44-23 Paul Keating Park Playground

*This report is considered to be confidential in accordance with Section 10A(2)(d)(i) of the Local Government Act, 1993, as it relates to commercial information of a confidential nature that would, if disclosed, prejudice the commercial position of the person who supplied it.*

- CARRIED

**COUNCIL RESOLVED INTO CONFIDENTIAL SESSION AT 7.13 PM AND  
REVERTED BACK TO OPEN COUNCIL AT 7.30 PM.**

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 18 APRIL 2023**

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**ITEM 11.1**                      **T44-23 PAUL KEATING PARK PLAYGROUND**  
**(416)**                              **CLR. EL-HAYEK:/CLR. RAFFAN**

RESOLVED that

1. Council accepts the tender received from Regal Innovations Pty Ltd for an amount of \$5,383,800.00 (excluding GST) for the Paul Keating Park Playground.
2. The Chief Executive Officer be authorised to enter into a contract and sign all documentation in accordance with Council's resolution, as required.
3. Council notifies the unsuccessful tenderers in writing and thank them for tendering.

- CARRIED

**THE MEETING CLOSED AT 7.32 P.M.**

Minutes confirmed 23 MAY 2023

.....  
Mayor



27 June 2023

The General Manager and Councillors  
Canterbury Bankstown Council  
PO Box 8  
Bankstown NSW 1885

Dear Sir/Madam

## OBJECTION TO INTERIM HERITAGE ORDER ST PAUL'S ANGLICAN CHURCH 459 CHAPEL ROAD, BANKSTOWN

### 1 PURPOSE

We understand that Canterbury Bankstown Council is considering whether to make an Interim Heritage Order (IHO) for the St Paul's Anglican Church site in Chapel Road, Bankstown. An IHO can be made under the following section of the *Heritage Act 1977*:

*25 Minister can authorise councils to make interim heritage orders for items of local heritage significance*

*(1) The Minister may, by order published in the Gazette, authorise a council to make interim heritage orders for items in the council's area.*

*(2) A council authorised under this section may make an interim heritage order for a place, building, work, relic, moveable object or precinct in the council's area that the council **considers may, on further inquiry or investigation, be found to be of local heritage significance, and that the council considers is being or is likely to be harmed.***

It is noted that an IHO may be made *if* Council considers that *further enquiry* may identify the building as having heritage significance. The purpose of this brief report is to assist Councillors and others in this consideration.

### 2 BACKGROUND

In November 2015 Bankstown City Council made an Interim Heritage Order (IHO) for the site. This was based on a 2015 Heritage Assessment by Sue Rosen & Associates heritage consultants (SRA), which concluded that it qualified for listing as an item of Local heritage significance.

An objection letter dated 18 February 2016 (Attachment 1 to this letter) was submitted by Graham Brooks, Director of GBA Heritage, on behalf of the Church, noting *inter alia* that the SRA assessment did not employ the longstanding and widely used assessment criteria for heritage listing established by the NSW Heritage Office (now Heritage NSW, delegate of the Heritage Council of NSW) in the document *Assessing Heritage Significance* (2001), and included inaccurate information about and characterisation of some site elements (pp. 2-4 of Attachment 1). The letter includes a formal heritage assessment based on the established criteria and concludes that the subject building does not qualify for listing as a heritage item.

GBA  
Heritage

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Nominated Architect  
Graham Leslie Brooks  
NSW Architects  
Registration 3836

GBA Heritage Pty Ltd  
Incorporated in NSW

ABN 56 073 802 730  
ACN 073 802 730

SRA provided a Supplementary Heritage Report, dated February 2016, that included a heritage assessment against the established criteria and a comparative analysis of churches designed by the architect, Norman McPherson, concluding (a) that the Church is characteristic of McPherson's work, and (b) that the Church building has High heritage significance based on the criteria for aesthetic, historic, associational and social significance.

This and previous GBA reports disagree with these conclusions. Graham Brooks responded to the Supplementary Heritage Report in a letter dated 11 April 2016 (Attachment 2), noting *inter alia* that the report mischaracterises the Church's lack of architectural integrity as a contributor to its significance, and concluding that the site did not qualify for heritage listing.

Subsequently Council resolved not to list the Church as a heritage item. This report briefly recaps and renews the basis for the Church's objection to heritage listing. It is noted that this letter addresses only the Church building itself.

### 3 HISTORY OF THE CHURCH

A timber Church building was constructed on the site c.1914-1920. In 1938 tenders were called by the architect Norman McPherson to build a new brick Church. McPherson's concept plan shows three buildings - a Church flanked by and connected to a hall and a rectory (see Figure 1) - but only part of it was completed by 1939 (see Figure 2). This stood until 1958, when the Chapel Road facade of the building was removed and a new section added (completed in 1961).

In terms of "cultural landscape", the built environment of any time reflects the changes in human occupation, use and need of the era. In c.1938 the first Church building was found to be inadequate and a new Church commissioned and partly built. In c.1958 the then Church building was found to be inadequate and a large new section added. The current Church building has been found to be inadequate and further evolution is required.

### 4 DESCRIPTION OF THE CHURCH

Photographs indicating the nature and context of the Church are included in Attachment 3 to this letter.

#### 4.1 Original concept

McPherson's original concept drawing shows an elegant compound at whose centre stands a restrained Romanesque Church with a simple gabled roof behind a low parapet, elegant tall pointed-arch (Gothic) windows and a high solid to void ratio. A modest bell tower, no taller than the Church itself, stands back from the front facade. To either side and set well back are the hall and rectory, connected to the Church by arched walls and to each other by a wing enclosing a rear courtyard.

It is clear that by 1958 McPherson's original concept had been largely abandoned, and only a small segment of it built. The two stages of the Church's construction are readily identifiable through external and internal differences in size, style and fabric.



**Figure 1**  
Excerpt from original 1938 concept drawing showing the compound with the intended Church at centre, the Hall at right and Rectory at left, with arched linking walls.  
Source: Courtesy St Paul's Anglican Church

## 4.2 Original section, 1938-1939

This section sits behind the addition, with a narrower footprint, and is generally not visible from either Chapel Road or French Avenue, that is, its form and significance cannot be appreciated from the public realm (see images 6-7 in Attachment 3 to this report). In form and style, this section was relatively consistent with the intent of McPherson's concept design, with tall narrow pointed-arch (Gothic) windows and a high solid to void ratio in all facades including the front, resulting in a simplified Romanesque mass that eschews complexity or Modernist 'streamlining' in vertical or horizontal dimensions.

Internally, this section features face brick walls in a Flemish bond pattern, with an expressed course at the

springing point of the window arches. The timber rafters and timber-lined soffits of the high roof are exposed, augmented at intervals by heavy timber trusses with decorative support brackets and turned centre chords, reflecting a degree of care invested in the modest building. The five-sided apse at the eastern end features an almost full-height pointed arch defined by three soldier courses, with a timber-lined semi-dome above. The original church organ has been removed.



**Figure 2**

The c.1938 Church.

Source: Bankstown Historical Society, image 785

## 4.3 Addition, 1958-1961

This section, with its greater width and mass and its forward siting, visually dominates the site as seen from the public realm and almost completely obstructs public views to the original section. While the brickwork closely matches the original section of the building, the lower eaves line resulting from the increased width has allowed only shorter, less elegant pointed-arch windows. At the eastern end of the addition, bricks protrude laterally from the walls to allow for the future keying in of the arched links to the rectory and hall, as called for in McPherson's original concept but never built. The Chapel Road facade is a clear departure from the original building's style, replacing the restrained brick facade of the original with strongly expressed, full-height vertical piers, an overhanging roof and a tower approximately twice the height of the Church.

Internally, the addition features slightly lighter face brick in plain stretcher bond, clearly distinguishable from and with a clear joint to the older section. While the exposed roof continues the timber rafters and lining of the original section, the timber trusses are replaced by utilitarian contemporary steel I-beams meeting the walls in an unmediated manner. Green acoustic panels line the upper section of the nave and a non-operational, *faux* church organ has been installed on the southern wall, adding to an impression of limited funds and/or attention. The western end of the Church features the entrance lobby with contemporary double glass doors facing Chapel Road, and above it a loft/gallery with a timber and glass balustrade, accessed via contemporary steel stairs.

## 4.4 Summary

While the c.1938 section of the building reflects the original design concept, which echoes a traditional Romanesque aesthetic, the c.1958 addition adopts a clearly different architectural style, reflecting the intervening global arrival of the Modernist spirit and aesthetic.

## 5 CULTURAL SIGNIFICANCE

Heritage value and significance is assessed on a comparative basis. Almost every building, for example, is in an identifiable style by an identifiable designer - but is it a comparatively good example of the style, or a comparatively good example of the work of a comparatively important designer?

### 5.1 The Architect: Norman McPherson

It is accepted that the original concept design and the c.1938 part of the building were the work of Norman McPherson. Regarding the c.1958 addition, however, the Heritage Assessment and Supplementary Heritage Report by SRA stated only that it 'may well have been' designed by McPherson, in partnership with DA Harrison<sup>1</sup>. This is supported by a small plaque (located in the addition but discovered recently), noting that the architects were McPherson and Harrison. This does not necessarily indicate the extent of McPherson's involvement.

McPherson practised from the 1920s to the 1970s, designing many churches in Sydney, as well as other buildings. As shown in Section 5.2 below, on the whole he was a conservative designer who preferred traditional forms. "There is a risk," he said, "of producing novelty for novelty's sake... just to be different from everyone else... The Church is not a testing ground for untried freaks..."<sup>2</sup> It is noted that neither McPherson nor Harrison are included in the *Encyclopedia of Australian Architects*, and generally McPherson may be said to have been neither an innovator nor a leader in the field, but a "journeyman" architect specialising in churches.

### 5.2 Comparative Analysis of McPherson's Church Designs

Examples of churches designed by McPherson, either alone or in partnership, are shown in Attachment 4 to this letter. While they vary stylistically, certain elements are generally common to all. First, there is a clear preference for traditional, that is, Gothic-influenced, style. Second, McPherson almost always employs a slender, pointed, Gothic-style spire, that is, one which goes beyond the utilitarian functions of housing a bell or creating a landmark, and expresses a "teleological" aspiration towards a higher purpose or goal.

A religious man himself, McPherson believed that church design "should be approached with reverence and a sincere desire to express its meaning with stable, lasting forms which come naturally from the worship within"<sup>3</sup> - the use of the spire as an expression of religious aspiration is clear. It is among the churches with such spires that the finest and most personally representative examples of McPherson's work are to be found. With their modest, blunt bell towers, neither the original design concept for St Paul's, nor its c.1958 built section, belong in this category.

### 5.3 Heritage Assessment of the Church

The NSW Heritage Office (now Heritage NSW, delegate of the Heritage Council of NSW) document *Assessing Heritage Significance* includes seven well-established criteria for the assessment of heritage significance, as well as guidelines for assessing whether each criterion is met. As noted above, such assessment is fundamentally comparative: the criteria are expressed in terms not of whether an item has, for example, a place in local history, as every item does, but whether it has an *important* place in local history.

The Church has been assessed in this manner by Graham Brooks in his letter of 18 February 2016 (Attachment 1 to this letter), and a new assessment by GBA Heritage is included in Attachment 5 to this report. The combined assessment is summarised below.

<sup>1</sup> SRA, *Supplementary Heritage Report*, p.8

<sup>2</sup> Quoted in "Sydney Church Building Revival", *Sydney Morning Herald*, 3 June 1953, p.13

<sup>3</sup> *Ibid*



Criterion	Does the Church meet the criterion?	
A <b>Historical significance:</b> An item is <i>important</i> in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area)	No	The small, hidden c.1938 section of the Church was conceived and built in, and can thus be said to reflect, a particular stage of Bankstown history. However this can be said of every church and every building, and is not sufficient to make it "important" in that history. The larger, more dominant c.1958 section is not known to reflect any particular event or stage of local or wider history. Thus as shown in Attachment 5, while the guidelines for meeting the criterion are technically met, the guidelines for <i>not</i> meeting it are also met and, crucially, the overarching criterion of importance is not.
B <b>Associative significance:</b> An item has <i>strong or special</i> association with the life or works of a person, or group of persons, <i>of importance</i> in NSW's cultural or natural history (or the cultural or natural history of the local area)	No	As with every site, the Church site can be connected to known landholders, to those who supported its construction and to certain parishioners. Again, this can be said of every church and almost every building, but neither section of the Church has any known "strong or special" association with any "important" person or group - other than, of course, the Anglican Church itself (which would qualify almost every church for heritage listing) and, it may be suggested, the architect, Norman McPherson. As shown in Attachment 5, one of the guidelines for <i>not</i> meeting this criterion is that the item has been "so altered that it can no longer provide evidence" of the association, and as noted in Section 4, were it not for the abovementioned plaque, there would be little evidence that the c.1958 section was McPherson's work. Further, as shown in Section 5.1, McPherson is not regarded as an "important" architect.
C <b>Aesthetic significance:</b> An item is <i>important</i> in demonstrating aesthetic characteristics and/or a <i>high degree</i> of creative or technical achievement in NSW (or the local area)	No	As shown in Section 5.1, McPherson's work in general did not represent innovation or a "high degree" of creative or technical achievement, and neither the concept design for St Paul's Church nor either of its built stages demonstrate the characteristics of McPherson's best works. Among the guidelines for <i>not</i> meeting this criterion are: "Has lost its design or technical integrity" and "Its positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded". "Integrity" refers to the degree of retention of original elements: neither the concept design nor the c.1938 section of the Church have a high degree of integrity. Further, the c.1938 section is no longer readily visible by the public and the landmark qualities of the c.1958 section, primarily reliant on the relative height of the bell tower, have generally been lost as high-rise buildings have proliferated in the vicinity (see images 4-5 in Attachment 3).
D <b>Social significance:</b> An item has <i>strong or special</i> association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons	No	While the Church and its grounds include a variety of expressions of parishioners' devotion such as signage, plaques and ground markers, again this does not differentiate the site from any other Church and does not demonstrate a "strong or special" association with its congregation compared to other Church/congregation relationships. Further, such attachment as the congregation may have appears to be to St Paul's as a ministry rather than as a building: the Rector of St Paul's advises that 95% of regular Church members have signed a petition supporting the redevelopment of the site, that is, demolition of the existing building. Regarding those who oppose redevelopment, the guidelines for not meeting this criterion include "Is retained only in preference to a proposed alternative": that is, if the item's retention is desired because the replacement is not, the criterion is not met.

E	<b>Technical / research significance:</b> An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the cultural or natural history of the local area)	No	There is no suggestion that either section of the building demonstrates construction techniques that were unusual for their times or are of research interest. Assessment of archaeological potential is outside the scope of this report. As shown in Attachment 5, the guidelines for <i>not</i> meeting this criteria are met.
F	<b>Rarity:</b> An item possesses <i>uncommon, rare or endangered</i> aspects of NSW's cultural or natural history (or the cultural or natural history of the local area)	No	It has been argued by SRA that the combination of two styles in one building make it rare. Far from being rare, such combinations of old and new are to be found everywhere. Further, this principle would make any addition of, for example, a tin shed to a grand Federation house, an enhancement of rather than an adverse impact on the house's heritage value. Indeed, as shown in Section 5.4, the c.1958 addition represents not an enhancement of but an adverse impact upon any significance and integrity the c.1938 section may have had. As shown in Attachment 5, the guidelines for meeting this criteria are not met, while the guidelines for <i>not</i> meeting it are.
G	<b>Representative significance:</b> An item is <i>important</i> in demonstrating the principal characteristics of <i>a class</i> of NSW's cultural or natural places; or cultural or natural environments (or a class of the local area's cultural or natural places; or cultural or natural environments)	No	The building is, but was not intended to be, a combination of two styles, the Inter-War Gothic and a vaguely Inter-War Romanesque/Modern, neither of whose principal characteristics it is important in demonstrating. The building satisfies none of the guidelines for meeting this criterion and all of the guidelines for not meeting it.

## 5.4 The Heritage Impact of the c.1958 Section

Were the c.1958 section proposed to be added to the c.1938 section today, a development application would have had to be accompanied by a Statement of Heritage Impact assessing the impact of the proposal on the heritage significance of the existing item. Among the impact assessment criteria needing to be addressed would be those established in the document *Statements of Heritage Impact* (1996, revised 2002) by the NSW Heritage Office and the Department of Urban Affairs & Planning. These criteria are expressed in the form of "questions to be answered"; the relevant questions are addressed below. The term "heritage item" in the following should be taken to refer to the unlisted c.1938 section of the Church.

### 5.4.1 Partial demolition

- *Are particular features of the item affected by the demolition (e.g. fireplaces in buildings)?*
- *Is the detailing of the partial demolition sympathetic to the heritage significance of the item (e.g. creating large square openings in internal walls rather than removing the wall altogether)?*
- *Is the demolition essential for the heritage item to function?*

The entire front facade has been demolished in a manner that is unsympathetic to the significance of the c.1938 item and the original organ has been removed and not replaced. The demolition was essential in order to accommodate the growing congregation.

#### 5.4.2 Additions

- *Will the additions tend to visually dominate the heritage item?*
- *Are the additions sympathetic to the heritage item? In what way (e.g. form, proportions, design)?*
- *How is the impact of the addition on the heritage significance of the item to be minimised?*
- *Can the additional area be located within an existing structure? If not, why not?*

The addition dominates the c.1938 section due to its forward location and greater bulk, almost entirely obstructing public views to it. The addition is partly sympathetic, and its impact partly minimised, by its use of similar materiality and its continuation of the basic form. It is unsympathetic in its enlarged scale; its use of smaller windows, a different internal brick colour and pattern and contemporary steel roof beams; its change of style from restrained traditionality to post-war modernity; its sometimes crude detailing; and its abandonment of the original concept design. The additional required area could not be located within the existing structure.

#### 5.4.3 New development adjacent to a heritage item

- *How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?*
- *Will the public, and users of the item, still be able to view and appreciate its significance?*

The addition almost entirely obstructs views to the item from the public realm. Users of or visitors to the site are able to appreciate the significance of the retained portion of the c.1938 section; the general public is not.

#### 5.4.4 Summary

An addition was necessary in order for the site to continue functioning in an evolving community context. However the c.1958 section as executed is an unsympathetic addition that has a significant adverse impact on any heritage value or significance that the c.1938 building and the site may have had.

### 5.5 Ongoing Evolution of the Site

As noted in Section 3, the site has evolved through several stages reflecting changes in use and need. The current Church building has been found to be inadequate and continued evolution is now required. This is not only due to the growth of the congregation: since 1958 the uses and needs of churches in general have also evolved, now serving not only a larger but a more diverse congregation and providing a wider range of community activities and services. Accommodating these contemporary uses and needs requires more than adding pew space, and cannot be achieved in the existing building. Rather than halt the evolution of the cultural landscape, the opportunity exists to “encourage new buildings that our generation can admire and enjoy — the heritage of the future.”<sup>4</sup>

While the Church does not qualify for heritage listing, the c.1938 section includes elements of interest. These include the timber trusses, the stained glass windows and some of the plaques and signage within the building and grounds. Any approved redevelopment of the site could incorporate some of these in an interpretative role.

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<sup>4</sup> NSW Heritage Office and Royal Australian Institute of Architects, *Design in Context* (2005), p.3

## 6 CONCLUSIONS

- The c.1958 addition had and has an adverse impact on whatever heritage significance the c.1938 building and site may have had, removing its front facade and significant internal elements, adding a completely different style of building in an unsympathetic manner that suggests limited funding and respect, representing the primary characteristics of neither style and almost entirely obstructing views of the c.1938 section from the public realm.
- The architect is not considered to be *important* in his field and the Church is not a good example of his work.
- The building is not *important* in the history of the area or State, is not associated with *important* persons or groups, is not *important* in demonstrating aesthetic quality, has no *special* connection to a social group, has no technical research potential and is neither rare nor *important* in representing a class of place.
- Consequently the building does not meet the established criteria for heritage listing and need not be retained.
- The site has been the subject of two reports and assessments by SRA and two by GBA Heritage (excluding this report). There is no reason to consider that “further enquiry or investigation” will reveal any relevant new information or assessment. Accordingly Section 25(2) of the *Heritage Act 1977* is not satisfied, and an IHO should not be made.

## 7 RECOMMENDATIONS

- Council should not make an Interim Heritage Order for the site, which should be permitted to continue its evolution as a place for religious and community use.
- The Anglican Church should be encouraged to redevelop the site in a manner that serves its congregation and the Canterbury Bankstown community into the future, while respecting the history of the St Paul’s congregation, site and location.
- Prior to any redevelopment of the site, the existing site including all buildings and their relevant contents should be photographically recorded and the record added to both St Paul’s and Council’s archives. Items of interest including a selection of stained glass windows, timber trusses and plaques, signage etc should be retained and reused in accordance with an approved Interpretation Plan.

Yours faithfully  
GBA Heritage Pty Ltd



Dov Midalia  
Associate Director  
dovmidalia@gbaheritage.com



18 February 2016

The General Manager  
Bankstown Council  
PO Box 8  
Bankstown NSW 1885

Attn: Amita Maharjan, Strategic Planner



## **OBJECTION TO HERITAGE LISTING ST PAUL'S ANGLICAN CHURCH GROUP 459 CHAPEL STREET, BANKSTOWN**

On behalf of St Paul's Anglican Church, Bankstown, we have pleasure in submitting this formal Objection to the potential LEP Heritage Listing of the entire site of the St Paul's Church group, on the corner of Chapel Road and French Avenue, Bankstown.

### **Summary of the Objection**

In summary the Church vigorously opposes the potential heritage listing of the property on the following grounds:

While the Heritage Inventory sheet for the property has been prepared by two respected historians, they have not reviewed and considered the nature of the current building fabric, its condition and integrity, or the evolution of the various buildings on the site. Accordingly, many of their research conclusions are incorrect. They have omitted a range of analytical information that must lead to different conclusions and recommendations than contained in the Inventory sheet.

The existing heritage significance analysis has NOT been made against the thresholds for listing for each of the standard Assessment Criteria published by the NSW Heritage Council. Their analysis does NOT provide any analysis of the place that makes a case for listing. Accordingly, their recommendation for listing is flawed.

The Council has given Development Consent (DA 907/2009) for the demolition of the entirety of the existing hall on the southern side of the site. This hall contains the remnants of the first church-related building on the site (c1914). A Construction Certificate (CC-699/2009/1) in relation to this DA was issued by Bankstown City Council on 23 October 2010. The permitted demolition includes the free standing Vestry and small toilet block.

Church related activities on the subject site date back to the earliest decades of the 20<sup>th</sup> century and have resulted in the periodic evolution of the site in terms of the buildings and building fabric in which those activities have taken place. This is particularly clear in the two distinct architectural styles contained in the main Church building and in the alterations and additions made to the original Church Hall. Heritage listing is highly likely to "freeze" this evolutionary development, severely restricting the capacity of the Church to continue evolving its services to the community.

### **Background**

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Council wrote to the Church on 25 November 2015 confirming that, on the initiative of Council, the NSW Government Gazette published a notice on 6 November 2015 of an Interim Heritage Order (IHO) over the subject property. The Interim Heritage Order will apply for a maximum of six months.

During the life of the IHO no major works, including demolition can be done on the property without the prior consent of Council.

During the life of the IHO Council must make a decision whether to list the Church as a local heritage item. It is proposed to report the matter to the Council meeting in March 2016.

The Church has an opportunity to review the heritage inventory that informed the making of the IHO and to make a written submission outlining its position as to whether Council should list the church as a local heritage item. The submission must be lodged by 19 February 2016, in order for it to be included as part of the report to Council. This Objection responds to that opportunity.

## **Analysis of the information contained in the Heritage Inventory form**

### **Physical Description**

There are a number of areas in this section of the Heritage Inventory which understate or incorrectly state the facts and consequently convey the wrong impression of the reality on the subject site.

1. The statement that the Church building was built in 1938 with some “modernisation” in 1961 does not recognise that only about one half of the 1938 master plan for the church and its surrounding complex were implemented. In 1961, major additions were made that extended the nave and included a contemporary façade and bell tower element.
2. The architectural style of the Church building cannot be simplistically reduced to “Inter-war Romanesque”. This ignores the radically different architectural style of the 1961 façade, entry and bell tower. At best the original section has a very restrained Inter-war Gothic imagery.
3. The original architectural master plan by McPherson for the site was a comprehensive and very formal arrangement of buildings that reinforced and gave real strength to the architectural presence of the Church as the centrepiece of the complex. This scheme was not realised, with only the rear portion of the Church built. See over for the extent of the works that were completed in 1939.



*1930s Master Plan for St Paul's Church Bankstown. largely unrealised, hanging in Hall*



*c1939 photo showing the partially completed Church nave and adjoining Church Hall, originally used as the Church, which had been extended in 1926-28 to the rear and side.*

*Source: Heritage Inventory*

4. There is no documentary evidence provided in the Heritage Inventory to support the implied conclusion that the 1961 façade and bell tower were designed by the original architect, NW McPherson.
5. The interiors of the completed Church are described as having “muscular” king post trusses. These only occur over the 1930s section of the nave and chancel. The roof structure over the 1961 extension comprises steel portal frames.
6. The organ dates from the 1960s. The organ pipes on the southern wall are purely decorative and non functional. The pews date from the 1960s. Some of the ecclesiastical furniture carries a gothic imagery and may date from the 1930s.
7. The Rectory cottage is a post WWII building, with no identified architect. It was erected in two stages, has no architectural distinction and awkwardly butts into the rear of the Church chancel in a manner that no architect would condone. It simply cannot be as claimed as “a feature of McPherson’s proposed layout for the Church.”



*Awkward junction between the Rectory roof and the Church chancel*

8. The description of the post-war Rectory as “Inter-War Old English” is entirely fanciful. It tries to give the building an architectural quality that is entirely lacking. The siting of the Rectory partially equates with the original master plan but does not fulfil its architectural quality or planning intent.



*The Rectory building post dates the original portion of the Church by at least a decade.*

9. The remnant Church Hall is generally described accurately in the Heritage Inventory. However the impact of the changes that are apparent when compared with the 1930s photo above, are understated.



*The remnant Church Hall is completely devoid of its original Federation character and has very little of its architectural integrity or early building fabric. Compare with the 1939 photo.*

The Description section makes no reference to the fact that Council granted consent in 2010 for the demolition of the Church Hall, its rear addition, the free standing current Rectory and toilet block. A Construction Certificate was issued by Council in 2011 for this demolition work. Accordingly, the demolition consent remains valid and can be activated at any time, if the Church chose to do so.

Despite its ability to demolish the Hall and outbuildings, the Church has no intention of doing so in the immediate future. These buildings provide useful spaces for the provision of the services that the Church offers to the Bankstown community. Until a realistic opportunity emerges for the provision of new facilities on the overall site, these buildings are likely to remain in service.



## Historical Notes

### Church Buildings

The section on the development of the Church building sets out the design and construction of the original section of the Church, and correctly ascribes it to the architect Norman Welland McPherson. It then states that the “second part was commenced in 1958 and opened on Easter Sunday 1961.”

This statement is very misleading as it implies the second stage of the Church building was simply the completion of the original design. This is not the case, as the architectural style was radically different and contemporary when compared with the restrained Inter-war Gothic style of the original section. It also implies that McPherson was the architect for the completion of the Church, but provides no documentary evidence to support this assumption.

### Importance of the Church to the Community

Much of the information contained in this section of the Heritage Inventory with reference to both the involvement of members of the Parish and of the events that have been held, are typical of most suburban church communities.

### Norman Welland McPherson

The information contained in the Heritage Inventory has been largely drawn from the AIA NSW Architects Bibliographical Information. This lists a number of churches designed and built by McPherson around NSW. The list establishes him as a significant practitioner in this field in the inter-war years. However the reference to him continuing to build churches into the 1960s does not provide sufficient evidence to link him with the second stage of the Church at Bankstown or other buildings on the site.

A review of some of the churches referred to in the AIA notes indicates that McPherson was responsible for a number of completed churches of far greater quality than the original section of the aborted St Pauls design.

## Conclusion

The concluding statement on pp 11 of the Inventory provides no information that would satisfy the required threshold criteria. For a place to be heritage listed it must demonstrate “special” or “important” attributes. The historical themes that are claimed for this site and collection of buildings are so general as to provide nothing more than a general background for a rigorous and detailed analysis against the standard NSW Heritage Assessment Criteria published by the NSW Heritage Council.

## Analysis against NSW Heritage Council Heritage Assessment Criteria

The analysis contained in the Heritage Inventory form uses terminology that does not take account of the actual Heritage Assessment Criteria published by the NSW Heritage Criteria, or the related thresholds for inclusion or exclusion. The full texts of each criterion and the Guidelines for Inclusion or Exclusion are set out below, followed by a commentary on the conclusions within the Heritage Inventory and a renewed conclusion as to whether the St Paul's Anglican Church Group qualifies for inclusion in the Bankstown LEP Heritage Schedule.

### Historical Significance Assessment Criteria

**Criterion (a) – An item is important in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area)**

*Guidelines for Inclusion: When the item shows evidence of a significant human activity or is associated with a significant activity or historical phase. When it maintains or shows the continuity of a historical process or activity.*

*Guidelines for Exclusion: When the item has incidental or unsubstantiated connections with historically important activities or processes. When it provides evidence of activities or processes that are of dubious historical importance or has been so altered that it can no longer provide evidence of a particular association*

The Heritage Inventory concludes that the Church group is "capable" of demonstrating a number of general historic themes and "able to demonstrate the theme of creative endeavour in its architecture and fittings". It goes on to conclude that the fabric and location of the buildings which make up St Paul's are "evidence" of the historic development of the area and its social history. The construction of the Church in phases "is also reflective of the socio-economic history of Bankstown." These conclusions are so general that they could be applied to any building or group of buildings in NSW.

There is no information or conclusion within the Heritage Inventory that refers in any way to St Paul's Church Group as being "important" in the course or pattern of Bankstown's cultural history, above or equal to any other religious or community group.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

### Historical Association Significance Criteria

**Criterion (b) - An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history (or the cultural or natural history of the local area)**

*Guidelines for Inclusion: When an item shows evidence of a significant human occupation or is associated with a significant event, person or group of persons.*

*Guidelines for Exclusion: When an item has incidental or unsubstantiated connections with historically important people or events. When it provides evidence of people or events that are of dubious historical importance or has been so altered that it can no longer provide evidence of a particular association*

The Heritage Inventory concludes that the complex has this significance due to its association "with a number of its parishioners who were local identities, and with the architect of the first stage of the Church building". These conclusions could be applied to every church in NSW.

There is no information or conclusion within the Heritage Inventory that refers in any way to St Paul's Church Group as having "strong or special" historical associations with the life or works of a person or persons of importance in the course or pattern of Bankstown's cultural history.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

## **Aesthetic Significance Criteria**

**Criterion (c) - An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area)**

*Guidelines for Inclusion: When an item shows or is associated with, creative or technical innovation or achievement. When it is the inspiration for a creative or technical innovation or achievement, is aesthetically distinctive, has landmark qualities or exemplifies a particular taste, style or technology.*

*Guidelines for Exclusion: When an item is not a major work by an important designer or artist, has lost its design or technical integrity. When an item's positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded or has only a loose association with a creative or technical achievement*

The Heritage Inventory concludes that "St Paul's ... demonstrates the work" of its architect, "who was responsive to trends in ecclesiastical architecture in the inter-war and post-war period". It continues that the church fabric is noteworthy for its quality brickwork and timber joinery and fittings, and the tower provides landmark value to the town precinct. Neither of these conclusions goes anywhere near the minimum threshold for LEP listing.

There is no information or conclusion within the Heritage Inventory that refers in any way to St Paul's Church Group as being important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the course or pattern of Bankstown's cultural history.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

## **Social Significance**

**Criterion (d) - An item has strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons**

*Guidelines for Inclusion: When an item is important for its association with an identifiable group or is important to a community's sense of place.*

*Guidelines for Exclusion: When an item is only important to the community for amenity reasons or is retained only in preference to a proposed alternative.*

The Heritage Inventory concludes that the "Church is socially significant due to the attachment of current parishioners, as demonstrated by their approach to Council, and their posting of an on-line petition in response to a perceived threat to the Church. It is also likely to be significant to those people whose family members are memorialised there or have their contribution to St Paul's acknowledged in the many plaques on its walls."

The references within the Heritage Inventory conclusion to those who formed an opposition to the potential demolition of the Church, directly places this aspect of the claimed social significance within the Guidelines for Exclusion. There is no evidence provided that raises the level of general social attachment common by any group of parishioners to the level of "strong or special".

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

### **Technical or Research Significance**

**Criterion (e) - An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the cultural or natural history of the local area)**

*Guidelines for Inclusion: When an item has the potential to yield new or further substantial scientific and/or archaeological information. When it is an important benchmark or reference site or type or provides evidence of past human cultures that is unavailable elsewhere.*

*Guidelines for Exclusion: When the knowledge gained would be irrelevant on science, human history or culture. When the item has little archaeological or research potential or only contains information that is readily available from other resources or archaeological sites. Where the knowledge gained would be irrelevant to research on science, human history or culture.*

The Heritage Inventory does not suggest that there is any aspect of the current buildings or their fabric that could add new understanding to the cultural history of Bankstown.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

### **Significance due to Rarity**

**Criterion (f) - An item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (or the cultural or natural history of the local area)**

*Guidelines for Inclusion: Where an item provides evidence of a defunct custom, way of life or process or demonstrates a process, custom or other human activity that is in danger of being lost. Where it shows unusually accurate evidence of a significant human activity or is the only example of its type. When an item demonstrates designs or techniques of exceptional interest or shows rare evidence of a significant human activity important to a community.*

*Guidelines for Exclusion: When an item is not rare or is numerous and not under threat.*

The Heritage Inventory for this criterion suggests that the linking of the Rectory to the Church is an unusual feature attempts to give status to what was apparently the result of poor design and planning. The Inventory then asserts that "the survival of the sequence of buildings which physically represent the history of St Paul's is also rare in the metropolitan setting." This is a ridiculous claim to make, given the numerous building ensembles around Sydney and further afield that grew over time and have retained much of their progressively constructed building fabric.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

### **Significance as a Representative Example**

**Criterion (g) - An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places; or cultural or natural environments (or a class of the local area's cultural or natural places; or cultural or natural environments)**

*Guidelines for Inclusion: When an item is a fine example of its type or has the principal characteristics of an important class or group of items. When an item has attributes typical of a particular way of life, philosophy, custom, significant process, design, technique or activity or is a significant variation to a class of items. Where it is outstanding because of its setting, condition or size or may be part of a group, which collectively illustrates a representative type. When an item is outstanding because of its integrity of the esteem in which it is held.*

*Guidelines for Exclusion: When an item is a poor example of its type or does not include or has lost the range of characteristics of a type. An item that does not represent well the characteristics that constitutes a type or variation from it.*

The Heritage Inventory for this criterion suggests that "St Paul's is representative of parish churches and communities that developed across greater Sydney in the 20<sup>th</sup> century." This is a claim that could be made for every one of the hundreds of churches established across Sydney or NSW in the whole of the 20<sup>th</sup> century. The claim completely misunderstands the nature of this assessment criterion.



The evolution of the buildings and building fabric at St Paul's, starting with the inability to complete the initial master plan and nave/façade of the main Church, coupled with alterations to the Hall, the mix of subsequent low quality buildings and the general lack of any clarity in the final group, places the complex directly into the Guidelines for Exclusion for this criterion.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.

### **Integrity**

Although not a formal heritage assessment criteria, the level of Integrity has a cross-cutting relevance to many of the formal criteria.

The Heritage Inventory claims that "St Paul's has a very high and unusual degree of integrity". This is at odds with the extant physical evidence, the historical evolution of the buildings and building fabric and the overall evidence provided in the Inventory.

The analysis of this criterion closely fits with the above Guidelines for Exclusion, and therefore the St Paul's Church Group cannot be listed as a heritage item under this criterion.



*The extent of lost integrity within the current St Paul's Church and Church Hall is particularly noticeable when compared with the late 1930s photo, or the masterplan included above.  
Source Google Street View*

## Conclusions reached during the preparation of this Objection

1. While the Heritage Inventory sheet for the property has been prepared by two respected historians, they have not reviewed and considered the nature of the current building fabric, its condition and integrity, or the evolution of the various buildings on the site. Accordingly many of their research conclusions are incorrect. They have omitted a range of analytical information that must lead to a different conclusion and recommendations to that contained in the Inventory sheet.
2. The existing heritage significance analysis has NOT been made against the thresholds for listing for each of the standard assessment criteria published by the NSW Heritage Council. Their analysis does NOT provide any analysis of the place that makes a case for listing. Accordingly, their recommendation for listing is flawed.
3. When the required heritage assessment is made against the required criteria and guidelines for inclusion, the unequivocal conclusion is that the St Paul's Church and Church Group DOES NOT meet a single one of the required entry thresholds. Accordingly, Council has no basis for moving forward with a proposal to list the Group as an item of the environmental heritage on Bankstown LEP.
4. The Council has given Development Consent (DA 907/2009) for the demolition of the entirety of the existing hall on the southern side of the site. This hall contains the remnants of the first church related building on the site (c1914). A Construction Certificate (CC-699/2009/1) in relation to this DA was issued by Bankstown City Council on 23 October 2010. The permitted demolition includes the free standing Vestry and small toilet block.
5. Despite its ability to demolish the Hall and outbuildings, the Church has no intention of doing so in the immediate future. These buildings provide useful spaces for the provision of the services that the Church offers to the Bankstown community. Until a realistic opportunity emerges for the provision of new facilities on the overall site, these buildings are likely to remain in service.
6. Church related activities on the subject site date back to the earliest decades of the 20<sup>th</sup> century and they have resulted in the periodic evolution of the site in terms of the buildings and building fabric in which that activity has taken place. This evolution is particularly clear in the two distinct architectural styles contained in the main Church building and in the alterations and additions made to the original Church Hall.
7. Heritage listing is highly likely to unnecessarily "freeze" this evolutionary development, severely restricting the capacity of the Church to evolve its services to the community.
8. The NSW Government has released a broader planning policy and development strategy for increased development in the immediate locality of the Church. This is part of a substantial urban growth corridor, a process that has already seen sites surrounding the Church property up-zoned for greater density. Heritage listing of the Church property is likely to prevent the Church from contributing to this overall strategy.
9. Heritage listing is also likely to prevent the Church from using its assets in an orderly and well considered manner to further its ability to provide services to the local community in Bankstown with a sustainable future pathway.

## Recommendations arising from this Objection

The Recommendations arising from this Objection are completely at odds with those contained in the Heritage Inventory. It is our belief that the Recommendations set out below are more soundly based on available information and on a rigorous application of the Heritage Assessment Criteria published by the NSW Heritage Council.

1. Council should accept that the St Paul's Anglican Church and Church Group at 459 Chapel Road, Bankstown DOES NOT meet any of the required heritage assessment criteria thresholds for listing as a heritage item on the LEP.
2. Council should take account of the existing Development Approval and Construction Certificate for the demolition of the remnant former chapel on the southern side of the Church building, being the remains of the original church related building on the site. These buildings can be demolished at any time.
3. Council should consider calling for the complete re-writing of the Heritage Inventory form that has been used to support the making of the IHO. The information and assessment contained in this Objection should be taken in to account when the Inventory is rewritten.
4. Council should formally resolve that the proposed LEP heritage listing of the St Paul's Church and Church Group will NOT proceed.

Yours faithfully  
GBA HERITAGE PTY LTD



Graham Brooks  
Director  
grahambrooks@gbaheritage.com

11 April 2016

The General Manager  
Bankstown Council  
PO Box 8  
Bankstown NSW 1885



Attn: Amita Maharjan, Strategic Planner

## **OBJECTION TO HERITAGE LISTING ST PAUL'S ANGLICAN CHURCH GROUP 459 CHAPEL STREET, BANKSTOWN**

On behalf of St Paul's Anglican Church, Bankstown, we have reviewed the Supplementary Report, dated February 2016, prepared by Sue Rosen and Roy Lumby, for the St Paul's Anglican Church site in Chapel Street, Bankstown.

The Supplementary Report, still fails to make a convincing or comprehensive case for the heritage listing of the site at 459 Chapel Street, Bankstown, on the Bankstown LEP or for the imposition of an Interim Heritage Order.

The principal deficiencies with the Report are as follows:

It includes the 1938 architectural sketch (Fig 3) of the original comprehensive development concept prepared by the architect Norman McPherson and subsequently discusses the fact that the original master plan was never implemented. Only the rear half of the church building was ever erected. However it then fails to ascribe any architectural or planning inadequacies in the extant complex of buildings on the site as a result of the failure to complete the project. There is no doubt that if the project had been completed as originally envisaged, the resulting complex would now qualify for LEP listing on the grounds of its aesthetic distinction and rarity in the Sydney Metropolitan area. In its current form, the uncompleted project fails on these criteria.

It provides a list of the completed churches by McPherson, many of which are fine examples of Interwar and to some extent post War ecclesiastical architecture. Within this collection of completed church buildings, the uncompleted original section remain as a very inadequate and not readily discernible example of his architectural work. There is no justification for listing on the basis that the architect produced a body of high quality work elsewhere in NSW.

The report admits that the architect for the subsequent development of the Church and for the remaining buildings on the site cannot be identified. However, it confidently assumes on the basis they might be, to conclude that the 1961 additions to the Church display McPherson's architectural skills and flexibility in adopting a contemporary architectural language for the completion of the building, its facade and tower. To adopt this assumption and attempt to build a major case for heritage listing, weakens the overall conclusions reached by the authors. The weakness of their conclusions is demonstrated by their own statements that the 1938 section of the Church was "characteristic" of McPherson's work, while the 1961 component was only "representative".

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The authors further attempt to raise the awkward combination of pre and post-war architectural styles to a new height, as demonstrated in the Conclusion on page 44 that "The church has an added level of distinction because of its two different architectural expressions, which are however linked by use of materials, scale and simple detailing to form a unified and successful whole". This conclusion cannot be sustained or supported. Each section of the church has adopted such a distinctly different architectural expression that the two do not sit comfortably or successfully together, despite consistent use of materials. They do not form a successful final composition.

Equally, there is no case to claim a specific significance in the fact that whoever designed the 1961 additions to the 1938 Church, whether or not it was McPherson, adopted a contemporary architectural expression. This is a mainstream fact of architecture, especially when there had been such a time lapse and a veritable earthquake in architectural design thinking after the Second World War.

The report continues to place great but utterly mistaken weight on the extremely awkward junction between the 1938 section of the Church and the post war Rectory. It claims that the junction reflects the compositional intent of the original McPherson master plan. This claim is ridiculous. The composition of the two buildings and junction reflects a very low or totally absent level of architectural design competence. It is not a continuation of the original concept. It simply reflects an unskilled attempt to fit the new Rectory building onto the adjoining area of the site, while keeping as much of the rear of the site clear for future development. The Church and the Rectory do not form an harmonious composition. The junction simply demeans the Church by the unsympathetic crudity of its conception and implementation.

The concluding heritage assessment does not follow the rigour demanded by the Assessment Criteria, as published by the NSW Heritage Council. Their assessment uses terms such as "capable of demonstrating" or "reflective", whereas the criteria demand that an item be an "important" example, demonstrate "strong or special" association, a "high degree" of creative achievement or possess "rare" aspects of the local cultural history. The assessment does not make a sufficient case for listing on a single one of the criteria. It describes what may be regarded as typical or common features, in terms of its historic development, associations and local esteem, of almost any place of worship in any local community in NSW or elsewhere. Such features are inherent in the nature of community based places of worship, irrespective of their religious heritage. With the subject site they cannot be regarded as special or particular. If they were, then every place of worship of every religion in every local community would be heritage listed.

Most importantly, the claim that the place is of social significance due to the strong reaction by members of the congregation to rumours of potential development threat, is specifically disallowed in the Heritage Council criteria, and has been so for many decades.

In conclusion, the supplementary report continues to ignore the important impact generated by lack of architectural integrity or aesthetic creativity in any of the extant buildings on the site and certainly on the complex as a whole, especially when considered against the original master plan. There is no valid or sustainable argument within the February report that justifies either LEP heritage listing or the imposition of an Interim Heritage Order over the property.

Yours faithfully  
GBA HERITAGE PTY LTD



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## ATTACHMENT 3 : SITE PHOTOGRAPHS

All photographs by GBA Heritage, May-June 2023

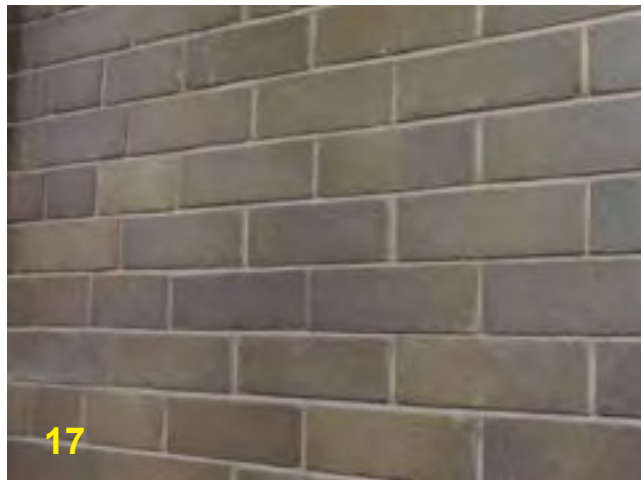


- 3 View east showing Church in context
- 4 View north along Chapel Road with Church indicated by arrow
- 5 View south along Chapel Road with Church indicated by arrow
- 6 View from Chapel Road of north side of Church with visible part of c.1938 section indicated by rectangle
- 7 View from Chapel Road of south side of Church with visible part of c.1938 section indicated by rectangle





- 8-9 Bricks on south and north sides of c.1958 addition intended to key into arched link walls *per* c.1938 concept
- 10 View east inside Church showing c.1938 section including timber trusses
- 11 View west inside Church showing c.1958 section including steel roof beams, loft/gallery over entrance lobby. Note significant difference in style and character compared to image 10
- 12 North wall of Church showing transition between c.1938 and c.1958 sections, including original organ loft and c.1958 acoustic panelling
- 13 Detail of c.1958 steel roof beam meeting wall. Compare to decorative timber brackets supporting trusses at wall (image 12)

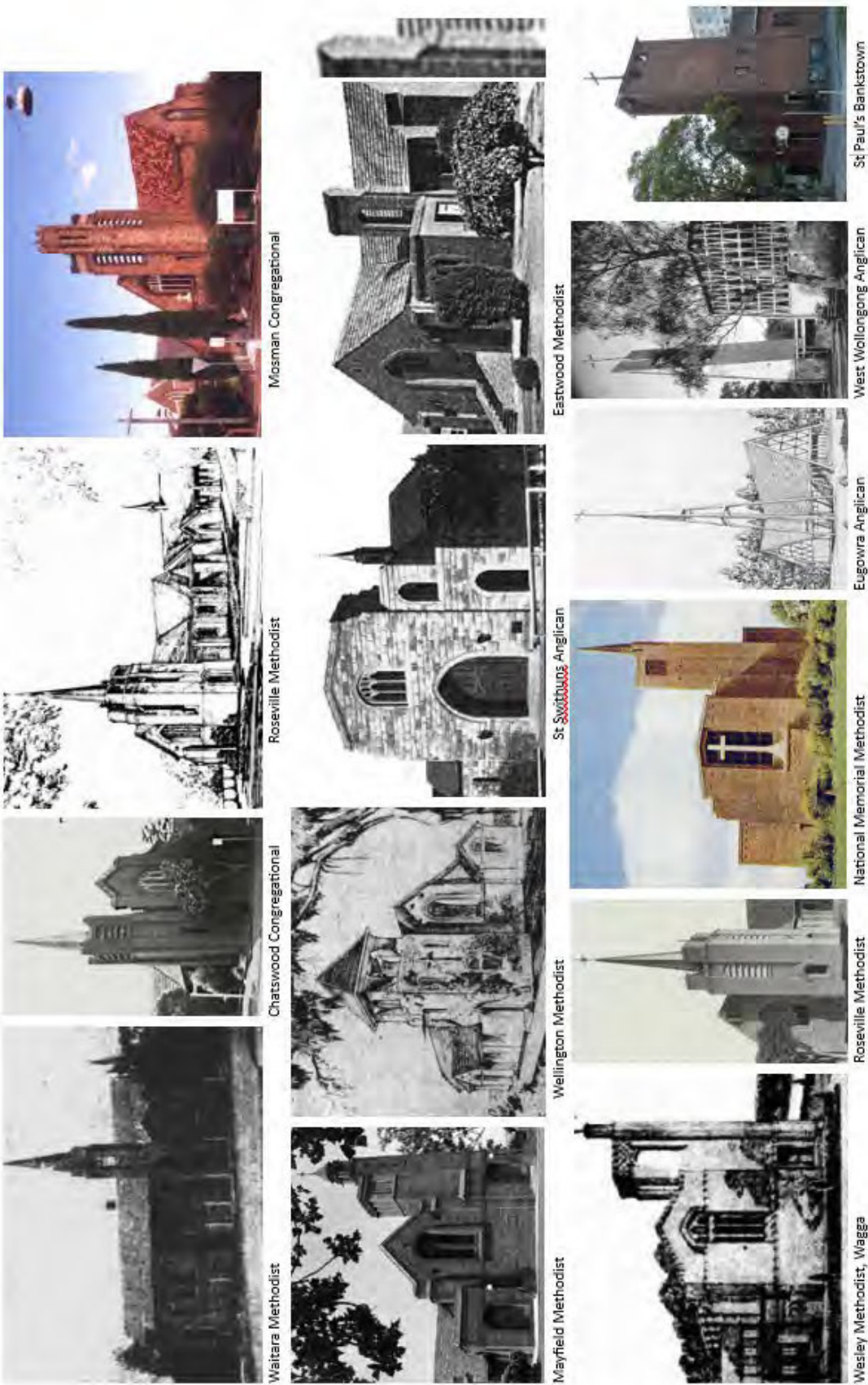


- 14 *Faux* organ on south wall, installed c.1958-1961
- 15 Acoustic panelling, c.1958-1961
- 16 Flemish bond pattern brickwork, internal walls, c.1938 section
- 17 Stretcher bond pattern brickwork, internal walls, c.1958 section
- 18 Brickwork transition from c.1938 section (left) to c.1958 section, south wall. Note change in bond pattern and brick colour



# ATTACHMENT 4 : CHURCHES BY N MCPHERSON

See Section 5.3 for comparative analysis



GBA HERITAGE : ASSESSMENT OF HERITAGE SIGNIFICANCE					
459 CHAPEL ROAD BANKSTOWN		APR 2023			
Criterion	Guidelines	Meets guideline	Comment	Meets criterion	
A	Historical significance				No
	An item is <b>important</b> in the course, or pattern, of NSW's cultural or natural history (State significance); OR An item is <b>important</b> in the course, or pattern, of the local area's cultural or natural history (local significance).	For inclusion			The three criteria are generally true of every church and most other buildings. However the church has had no <b>important</b> impacts on or role in local or State history.
		Shows evidence of a significant human activity	Yes		
		Is associated with a significant activity or historical phase	Yes		
	Maintains or shows the continuity of a historical process or activity	Yes			
	For exclusion			Religious activity is as historically remarkable as any human activity, ie not especially remarkable, and has not had an <b>important</b> impact on local or state history.	
	Has incidental or unsubstantiated connections with historically important activities or processes	Yes			
Provides evidence of activities or processes that are of dubious historical importance.	Yes				
	Has been so altered that it can no longer provide evidence of a particular association	Yes	The original building has been significantly altered and added to, and now represents two periods of distinct styles without being a fine example of either. In neither of the two periods did it have an <b>important</b> impact on or role in local or State history.		

# GBA HERITAGE : ASSESSMENT OF HERITAGE SIGNIFICANCE

459 CHAPEL ROAD BANKSTOWN APR 2023					
Criterion	Guidelines	Meets guideline	Comment	Meets criterion	
B	Associational significance			No	
	An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history (State significance); OR An item has strong or special association with the life or works of a person, or group of persons, of importance in the cultural or natural history of the local area (local significance).				
	For inclusion				
	Shows evidence of a significant human occupation	No	No known associations with important persons. Every location is associated with certain families who influenced local history, or with certain architects: being able to identify these does not qualify them as persons of importance. McPherson is not listed in the Encyclopedia of Australian Architects or the Dictionary of Australian Biography. Although he designed many NSW churches he was neither innovative nor influential, ie not <b>important</b> in the field.		
	Is associated with a significant event, person, or group of persons	No			
	For exclusion				
	Has incidental or unsubstantiated connections with historically important people or events	Yes	No known connection with <b>important</b> persons or events. McPherson is not considered important, and, based on the absence here of a strong characteristic of McPherson's other church designs ('teleological' spires) this building is not considered to be a fine example of his work.		
	Provides evidence of people or events that are of dubious historical importance	Yes			
	Has been so altered that it can no longer provide evidence of a particular association	Yes			



GBA HERITAGE : ASSESSMENT OF HERITAGE SIGNIFICANCE					
459 CHAPEL ROAD BANKSTOWN		APR 2023			
Criterion	Guidelines	Meets guideline	Comment	Meets criterion	
C	Aesthetic significance	For inclusion			No
	An item is <b>important</b> in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (State significance); OR An item is <b>important</b> in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area (local significance).	Shows or is associated with, creative or technical innovation or achievement	No	The two parts represent Gothic or simplified/modern Gothic design, neither displaying <b>important</b> technical innovation or achievement.	
		Is the inspiration for a creative or technical innovation or achievement	No	McPherson followed rather than led design styles.	
		Is aesthetically distinctive	No	A very simple design with no innovative, unusual, striking or <b>important</b> aesthetic characteristics	
		Has landmark qualities	Yes	By virtue of comparative height due to tower – as with almost every church.	
		Exemplifies a particular taste, style or technology	No	Divided between at least two styles.	
		For exclusion			
	Is not a major work by an important designer or artist	Yes	As noted above, McPherson is not considered an <b>important</b> architect or designer, and this is not considered to be a major or fine example of his work.		
	Has lost its design or technical integrity	Yes	McPherson's original design was never completed and the second (c1958) stage departed considerably from the original concept. The transition between the building's two halves and styles is abrupt, blurring the integrity of each.		
	Its positive visual or sensory appeal or landmark and scenic qualities have been more than temporarily degraded	No	The highly visible second stage including the tower has not been significantly degraded but its visual appeal was minimal, and its degradation is not the cause of its lack of aesthetic <b>importance</b> .		
	Has only a loose association with a creative or technical achievement	Yes	Stage 1 has minimal references to Gothic style and stage 2 loosens the links again while also weakly referring to modernism.		



GBA HERITAGE : ASSESSMENT OF HERITAGE SIGNIFICANCE					
459 CHAPEL ROAD BANKSTOWN		APR 2023			
Criterion	Guidelines	Meets guideline	Comment	Meets criterion	
D	Social significance	For inclusion		No	
	An item has strong or special association with a particular community or cultural group in NSW for social, cultural or spiritual reasons (State significance); OR An item has strong or special association with a particular community or cultural group in the area for social, cultural or spiritual reasons (local significance).	Is important for its associations with an identifiable group	No	Associated with the congregation, as is true for every church, but there is no evidence of such association having been unusually strong or sufficiently so to make the site special.	
		Is important to a community's sense of place	Yes	Possibly, as is likely true for every church as well as other sites including shopping centres, pubs, town halls, etc. No evidence of a special association.	
		For exclusion			
		Is only important to the community for amenity reasons	Yes	No evidence of community attachment to the buildings themselves except as place of worship.	
		Is retained only in preference to a proposed alternative	Yes		
E	Technical/research significance	For inclusion		No	
	An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (State significance); OR An item has potential to yield information that will contribute to an understanding of the area's cultural or natural history (local significance).	Has the potential to yield new or further substantial scientific and/or archaeological information	No	No unusual techniques or design elements and no known archaeological significance.	
		Is an important benchmark or reference site or type	No	Not known as benchmark or reference site or type.	
		Provides evidence of past human cultures that is unavailable elsewhere	No	Other churches across Sydney and NSW provide similar evidence.	
		For exclusion			
		The knowledge gained would be irrelevant to research on science, human history or culture	Yes	No new technical or research information is known to be available	
		Has little archaeological or research potential	Yes	No known archaeological or research potential.	
		Only contains information that is readily available from other resources or archaeological sites	Yes	There are many other sites locally with similar likely archaeological significance, and many similar or more technically complex churches elsewhere.	

# GBA HERITAGE : ASSESSMENT OF HERITAGE SIGNIFICANCE

459 CHAPEL ROAD BANKSTOWN					
APR 2023					
Criterion	Guidelines	Meets guideline	Comment	Meets criterion	
F	Rarity	For inclusion			No
	An item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (State significance); OR An item possesses uncommon, rare or endangered aspects of the area's cultural or natural history (local significance).	Provides evidence of a defunct custom, way of life or process	No	The Anglican faith and its processes are not defunct or in danger	
		Demonstrates a process, custom or other human activity that is in danger of being lost	No		
		Shows unusually accurate evidence of a significant human activity	No	The church shows typical evidence of faith practice	
		Is the only example of its type	No	There are many such churches in Sydney and NSW	
		Demonstrates designs or techniques of exceptional interest	No	The buildings are not innovative or exceptional	
		Shows rare evidence of a significant human activity important to a community	No	Such evidence is common in Sydney and NSW	
		For exclusion			
		Is not rare	Yes	Such sites are not rare in Sydney or NSW	
		Is numerous but under threat	No	The type is numerous and not under threat. The building is under threat.	

# GBA HERITAGE : ASSESSMENT OF HERITAGE SIGNIFICANCE

459 CHAPEL ROAD BANKSTOWN APR 2023					
Criterion	Guidelines	Meets guideline	Comment	Meets criterion	
G	Representative significance	For inclusion			No
	An item is <b>important</b> in demonstrating the <b>principal</b> characteristics of a class of NSW's cultural or natural places; or cultural or natural environments (State significance); OR An item is <b>important</b> in demonstrating the <b>principal</b> characteristics of a class of the area's cultural or natural places; or cultural or natural environments (local significance).	Is a fine example of its type	No	The building is a hybrid of two types and a fine example of neither	
		Has the principal characteristics of an important class or group of items	No	Lacks principle characteristics of either Gothic churches (buttresses, Gothic spire) or modernist churches	
		Has attributes typical of a particular way of life, philosophy, custom, significant process, design, technique or activity	No	Has attributes of a church of any kind – as with many churches	
		Is a significant variation to a class of items	No	Is not a significant variation to either Gothic or modernist styles	
		Is part of a group which collectively illustrates a representative type	No	Not part of a group	
		Is outstanding because of its setting, condition or size	No	Is not outstanding in these parameters	
		Is outstanding because of its integrity or the esteem in which it is held	No	The original design has been much altered and the initial structure has been added to with a different style. The building is not known to be held in high esteem as a building	
		For exclusion			
		Is a poor example of its type	Yes	Is a poor example of both Gothic and modernist styles	
	Does not include or has lost the range of characteristics of a type	Yes	Does not include significant characteristics of either Gothic or modernist styles or variations thereof		
	Does not represent well the characteristics that make up a significant variation of a type	Yes			



**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

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**PRESENT:** Mayor, Councillor El-Hayek  
Councillors Abouraad, Akter, Cahill, Coorey, Downey, Harika, Ishac, Nguyen,  
Saleh OAM, Waiba, Walsh and Zakhia

**APOLOGIES** Councillors Asfour and Raffan

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**HIS WORSHIP THE MAYOR DECLARED THE MEETING OPEN AT 7.15 PM.**

**ACKNOWLEDGEMENT OF COUNTRY**

THE MAYOR, ACKNOWLEDGED THE TRADITIONAL OWNERS OF THE LAND WHERE WE ARE MEETING TODAY THE DARUG (DARAG, DHARUG, DARUK AND DHARUK) AND THE EORA PEOPLES, AND PAID RESPECT TO THEIR ANCIENT CULTURE AND THEIR ELDERS PAST AND PRESENT.

**SECTION 1: CONFIRMATION OF MINUTES**

**(454)**

**CLR. ABOURAAD:/CLR. HARIKA**

RESOLVED that the minutes of the Ordinary Council Meeting held on 23 May 2023 be adopted.

- CARRIED

**SECTION 2: LEAVE OF ABSENCE**

**(455)**

**CLR. HARIKA:/CLR. ISHAC**

RESOLVED that Leave of Absence be granted to Clr Asfour and Clr Raffan due to personal reasons.

- CARRIED

**SECTION 3: DECLARATIONS OF PECUNIARY INTEREST OR NON-PECUNIARY CONFLICT OF INTEREST**

In respect of Item 4.5 – Local Community Based Donations, Clr Saleh OAM declared a Significant, Non Pecuniary Conflict of Interest given his role as Chair of the Riverwood Community Centre, and as such, he will vacate the chamber taking no part in debate.



**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

In respect of Item 4.5 – Local Community Based Donations, Cllr Waiba declared a Significant, Non Pecuniary Conflict of Interest given her role as Board Member of the Riverwood Community Centre, and as such, she will vacate the chamber taking no part in debate.

In respect of Item 11.4 – Voyager Point Footbridge – Agreement with Liverpool City Council, Cllr Ishac declared a Non-significant, Non Pecuniary Conflict of Interest given his work involvement at Liverpool City Council, and as a matter of precaution, he will vacate the chamber taking no part in debate.

**SECTION 4: MAYORAL MINUTES**

**ITEM 4.1 THE VOICE TO PARLIAMENT REFERENDUM**

**(456) CLR. EL-HAYEK**

RESOLVED that

1. Council establishes a Your Choice, Your Voice information page on our corporate and social media sites, and to utilise the Federal Government's Yes and No referendum material to present a balanced and unbiased coverage.
2. Council facilitates information sessions across our City, which includes distributing the Federal Government material.

- CARRIED

**ITEM 4.2 MAYOR'S SLEEPOUT 2023**

**(457) CLR. EL-HAYEK**

RESOLVED that

1. Council to hold a Mayor's sleepout on 11 August 2023, aptly during homelessness week (6-12 August 2023).
2. Community leaders and business CEOs be invited to join me as we raise funds through Mission Australia.
3. Council staff identify a suitable location and coordinate the event, including promoting it through the community.

- CARRIED

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

**ITEM 4.3**                      **BANKSTOWN-LIDCOMBE HOSPITAL LOCATION**  
**(458)**                        **CLR. EL-HAYEK**

RESOLVED that Council write to the NSW Health Minister the Hon. Mr Ryan Park MP asking him to clear up the ambiguity around the location of the new hospital and to update us on a timeline to build it.

- CARRIED

CLR COOREY REQUESTED THAT HER NAME BE RECORDED AS VOTING AGAINST THIS RESOLUTION.

**ITEM 4.4**                      **MAYORAL CERTIFICATES OF RECOGNITION**  
**(459)**                        **CLR. EL-HAYEK**

RESOLVED that

1. Council introduce Mayoral Certificates of Recognition, certificates awarded to individuals, organisations and school children and not based on any popular vote but merit.
2. The first certificate will be a Mayoral award bestowed to locals who contribute to our city. This recognition could be a certificate of letter to those I encounter, or am told about, during my visits across our City.
3. The second certificate will acknowledge the school children in our City by introducing the Mayor's Merit Award. This non-academic award will be given to a student/s, nominated by their school, as someone who has contributed to making a real difference. It could be through volunteering, through creative and innovative thinking or maybe mentoring other students.

- CARRIED

**ITEM 4.5**                      **LOCAL COMMUNITY BASED DONATIONS**

In respect of Item 4.5 – Local Community Based Donations, Clr Saleh OAM declared a Significant, Non Pecuniary Conflict of Interest given his role as Chair of the Riverwood Community Centre, and as such, he vacated the chamber taking no part in debate.

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

In respect of Item 4.5 – Local Community Based Donations, Clr Waiba declared a Significant, Non Pecuniary Conflict of Interest given her role as Board Member of the Riverwood Community Centre, and as such, she vacated the chamber taking no part in debate.

CLRS SALEH OAM AND WAIBA TEMPORARILY VACATED THE CHAMBER AT 7.30 PM AND RETURNED AT 7.31 PM.

**(460)**

**CLR. EL-HAYEK**

RESOLVED that

1. Council support a fee waiver for The Association for the Development of the Arabic Folk Poetry in Australia and the Arab World Incorporation towards the hire of the Bryan Brown Theatre of \$500.00.
2. Council support a fee waiver for the Recreation Sports and Aquatics Club towards the hire of Grahame Thomas Oval of \$500.00.
3. Council support a fee waiver for the East Hills Charity Car Show towards the hire of Kelso Park of \$574.00 and an in Kind donation (electrical services) of \$400.00.
4. Council support a donation to support the Padstow Community Care 2023 Winter Appeal of \$1,000.00.
5. Council support a fee waiver for Riverwood Community Centre towards the hire of Salt Pan Creek Reserve of \$643.00.

- CARRIED

**SECTION 5:**

**PLANNING MATTERS**

**ITEM 5.1**

**ST PAUL'S ANGLICAN CHURCH – 459 CHAPEL ROAD, BANKSTOWN**

**(461)**

**CLR. CAHILL:/CLR. DOWNEY**

RESOLVED that

1. Council notes that under Council's delegation for making an Interim Heritage Order, it cannot apply for an Interim Heritage Order for a second time.
2. Council notes that the Heritage Office of the Department of Planning and Environment has noted it would not place an Interim Heritage Order on the St Paul's Anglican Church site, and recommended Council consider heritage as part of the Bankstown City Centre Master Plan.

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

3. Council investigate the significance of the St Paul's Anglican Church site at 459 Chapel Road, Bankstown as part of a heritage study, to include all previous reports (in accordance with recommendation 2).
4. Council request the Department of Planning and Environment to exhibit the heritage study together with the Bankstown City Centre planning proposal post-Gateway.
5. The matter be reported to Council following the exhibition of the Bankstown City Centre planning proposal, including a response to proposed heritage listings.

- CARRIED

**ITEM 5.2**                      **PLANNING PROPOSAL - 30 TREVENAR STREET, ASHBURY**  
**(462)**                         **CLR. DOWNEY:/CLR. ABOURAAD**

RESOLVED that

1. The matter be deferred for a Councillor Briefing
2. Council Officers write to the Department of Planning to seek an extension of time.

- CARRIED

**SECTION 6:**                 **POLICY MATTERS**

**ITEM 6.1**                      **ENVIRONMENTAL SUSTAINABILITY POLICY**  
**(463)**                         **CLR. ISHAC:/CLR. ZAKHIA**

RESOLVED that Council adopts the updated Environmental Sustainability Policy.

- CARRIED



**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

**ITEM 6.2**                      **MOBILE FOOD VENDING VEHICLES POLICY**  
**(464)**                         **CLR. ZAKHIA:/CLR. ABOURAAD**

RESOLVED that

1. Council endorse the Mobile Food Vending Vehicles Policy, and the Policy to be placed on public exhibition.
2. A further report be brought back to Council, following public exhibition.

- CARRIED

**ITEM 6.3**                      **COUNCILLOR EXPENSES AND FACILITIES POLICY**  
**(465)**                         **CLR. DOWNEY:/CLR. CAHILL**

RESOLVED that the matter be deferred for a Councillor Briefing.

- CARRIED

**SECTION 7:                      GOVERNANCE AND ADMINISTRATION MATTERS**

**ITEM 7.1**                      **INTEGRATED PLANNING AND REPORTING - ADOPTION OF REVISED CBCITY 2025**  
**(INCORPORATING THE DELIVERY PROGRAM 2022-25 AND OPERATIONAL PLAN**  
**2023/24), ASSET MANAGEMENT STRATEGY 2023-33 AND FINANCIAL**  
**MANAGEMENT STRATEGY 2023-33**  
**(466)**                         **CLR. ABOURAAD:/CLR. CAHILL**

RESOLVED that

1. In accordance with ss402-406 of the *Local Government Act 1993*, Council's revised Integrated Planning and Reporting documents, including Council's Delivery Program 2022-25 and Operational Plan 2023/24 incorporating the Budget and Schedule of Fees and Charges (collectively known as CBCity 2025); Asset Management Strategy 2023-33; and Financial Management Strategy 2023-33 be adopted.
2. Those members of the community that provided formal submissions be thanked and advised of Council's responses in this report.

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

3. In accordance with the relevant sections of the *Local Government Act 1993*, Council makes the following Rates and Charges – Former Bankstown City Council:

**3.1 Rating**

Subject to the provisions of the *Local Government Act 1993*, an ordinary rate be made and levied for the rating year 1 July 2023 to 30 June 2024 upon the land value of all rateable land within the former Bankstown City Council categorised as Residential or Business as detailed in the following table:

Category / Sub-Category	Ad-Valorem Rate	Minimum Rate
Residential – Ordinary	0.00126660	\$990.00
Business – Commercial Large	0.00424311	\$990.00
Business – Commercial General	0.00360981	\$990.00
Business – Industrial Large	0.00424311	\$990.00
Business – Industrial General	0.00360981	\$990.00
Business – Ordinary	0.00297651	\$990.00

The residential and business ad valorem rates in the table above have been adjusted to account for year 3 (2023/24) of the eight-year gradual harmonisation process in order to have one harmonised rating structure for the City by 1 July 2028.

**3.1.1 Bankstown Airport**

For properties where an ex-gratia payment in lieu of rates is applicable, Council will apply an equivalent ad-valorem rate or minimum charge that applies to the Business – Industrial General sub-category.

**3.2 Domestic Waste Management Service Charges**

Subject to provision of Sections 496, 501, 502 and 504 of the *Local Government Act 1993*, annual Domestic Waste Management Charges be made and levied on a pro-rata quarterly basis for the year 1 July 2023 to 30 June 2024, as follows:

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

Type of Charge	Short Name	Annual Charge
An Annual Domestic Waste Management Service charge per service for each parcel of Rateable Residential land for which a service is available.	Domestic – Waste Management	\$605.00
Each additional service in respect of single dwelling premises.	Domestic Waste Extra Service	\$335.00
Each additional service in respect of multi residential units - 240L.	Domestic Waste Extra Strata Service	\$369.00
Each additional service in respect of multi residential units - 660L.	Domestic Waste Extra Strata Service	\$1015.00
Each additional service in respect of multi residential units - 1100L.	Domestic Waste Extra Strata Service	\$1,667.00
Each additional service in respect of recycling.	Extra Recycling Service	\$94.00
Each additional service in respect of Greenwaste.	Extra Green Waste Service	\$153.00
Rateable Vacant Land	Domestic Waste Vacant Land	\$159.00
Each additional service in respect of multi residential unit - single bins	Domestic Waste Extra Service Strata single bin	\$166.00

### **3.3 Stormwater Management Charges**

Council make and levy an annual stormwater management service charge for the year 1 July 2023 to 30 June 2024 as follows:

Description of Charge	Charge
Annual residential property charge	\$25.00
Annual residential strata property charge	\$12.50
Annual business property charge per 350 square metres or part there-of for non-vacant business land	\$25.00
Annual business property charge per 350 square metres or part there of surface land area for strata business unit (proportioned to each lot based on unit entitlement) not less than \$5.00.	\$25.00
Mixed Developments – see below	

#### **3.3.1 Mixed Developments**

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

- Adopt the dominant Rating category as applied to the parcel of land as determined by the Valuer General and apply to each relevant property; and
- In the event that a mixed development is 50% residential and 50% business, Council will apply a residential stormwater management charge.

**3.3.2 Bankstown Airport**

- For properties where an ex-gratia payment in lieu of rates is applicable, Council will apply an annual Stormwater Management Charge of \$25.00 per property plus an additional \$25.00 for each 350 square metres or part of 350 square metres by which the area of the parcel of land exceeds 350 square metres.

**3.3.3 Exemptions**

- Bowling and Golf Clubs - where the dominant use is open space;
- Council-owned land;
- Properties zoned: Open space 6(a); Private Recreation 6(b); and Rural.

**3.4 Interest Rate on Overdue Rates & Charges**

Subject to the provisions of Section 566(3) of the *Local Government Act 1993* the rate of interest charged on overdue rate instalments be set at the maximum rate specified by the Minister for Local Government from time to time. The rate of interest payable on overdue rates and charges for the period 1 July 2023 to 30 June 2024 (inclusive) will be 9.0% per annum.

**3.5 Voluntary Pensioner Rebate**

In addition to the current maximum pensioner rebate of \$250.00 per annum, Council continue to provide a further voluntary rebate, totalling \$40.00 per annum in accordance with Council's 'Rates and Charges, debt recovery and Hardship Assistance Policy'.

4. In accordance with the relevant sections of the *Local Government Act 1993*, Council makes the following Rates and Charges – former Canterbury City Council:

**4.1 Rating**

Subject to the provisions of the *Local Government Act 1993*, an ordinary rate be made and levied for the rating year 1 July 2023 to 30 June 2024 upon the



**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

land value of all rateable land within the former Canterbury City Council categorised as Residential or Business as detailed in the following table:

Category / Sub-Category	Ad-Valorem Rate	Minimum Rate
Residential – Ordinary	0.00129942	\$990.00
Business – Commercial Large	0.00435306	\$990.00
Business – Commercial General	0.00370335	\$990.00
Business – Industrial Large	0.00435306	\$990.00
Business – Industrial General	0.00370335	\$990.00
Business – Ordinary	0.00305364	\$990.00

The residential and business ad valorem rates in the table above have been adjusted to account for year 3 (2023/24) of the eight-year gradual harmonisation process in order to have one harmonised rating structure for the City by 1 July 2028.

#### **4.2 Domestic Waste Management Service Charges**

Subject to the provisions of Sections 496, 501, 502 and 504 of the *Local Government Act 1993*, annual Domestic and Non-Domestic Waste Management Charges be made and levied on a pro-rata quarterly basis for the year 1 July 2023 to 30 June 2024, as follows:

Type of Premises	Short Name	Annual Charge
An Annual Domestic Waste Management Service charge per service for each parcel of Rateable Residential land for which a service is available.	Domestic Waste Service	\$605.00
Properties categorised as Business (with or without residential accommodation)	Waste Management – Business	\$605.00
Each additional service.	Domestic Waste Extra Service	\$335.00
Each additional service in respect of multi residential units - 240L.	Domestic Waste Extra Strata Service	\$369.00
Each additional service in respect of multi residential units - 660L.	Domestic Waste Extra Strata Service	\$1,015.00

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

Each additional service in respect of multi residential units - 1100L.	Domestic Waste Extra Strata Service	\$1,667.00
Each additional service in respect of recycling.	Extra Recycling Service	\$94.00
Each additional service in respect of Greenwaste.	Extra Green Waste Service	\$153.00
Rateable Vacant Land	Domestic Waste Vacant -	\$159.00

#### **4.3 Stormwater Management Charges**

Council make and levy an annual stormwater management service charge for the year 1 July 2023 to 30 June 2024 as follows:

<b>Description of Charge</b>	<b>Charge</b>
Annual residential property charge	\$25.00
Annual residential strata property charge	\$12.50
Annual business property charge per 350 square metres or part there-of for non-vacant business land	\$25.00
Annual business property charge per 350 square metres or part there of surface land area for strata business unit (proportioned to each lot based on unit entitlement) not less than \$5.00.	\$25.00
Mixed Developments – see below	

##### **4.3.1 Mixed Developments**

- Adopt the dominant Rating category as applied to the parcel of land as determined by the Valuer General and apply to each relevant property; and
- In the event that a mixed development is 50% residential and 50% business, Council will apply a residential stormwater management charge.

##### **4.3.2 Exemptions**

- Bowling and Golf Clubs - where the dominant use is open space;
- Council-owned land;
- Properties zoned: Open space 6(a); Private Recreation 6(b); and Rural.

#### **4.4 Interest Rate on Overdue Rates & Charges**

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

Subject to the provisions of Section 566(3) of the *Local Government Act 1993* the rate of interest charged on overdue rate instalments be set at the maximum rate specified by the Minister for Local Government from time to time. The rate of interest payable on overdue rates and charges for the period 1 July 2023 to 30 June 2024 (inclusive) will be 9.0% per annum.

**4.5 Voluntary Pensioner Rebate**

In addition to the current maximum pensioner rebate of \$250.00 per annum, Council continue to provide a further voluntary rebate, totalling \$40.00 per annum, in accordance with Council's 'Rates and Charges, Debt Recovery and Hardship Assistance Policy.

5. Council endorse the adjustment to Council's full-time equivalent employee resources, as outlined in the report.
6. Council adopt the proposed Financial Management and Asset Management Strategies and actions, as outlined in the report.
7. Council adopt the use of Ward Funds, as outlined in the report.

- CARRIED

**ITEM 7.2**  
**(467)** **GRIFFITH PARK PRECINCT PLAN**  
**CLR. DOWNEY:/CLR. HARIKA**

RESOLVED that Council commence the Griffith Park Precinct Design process.

- CARRIED

**ITEM 7.3**  
**(468)** **CASH AND INVESTMENT REPORT AS AT 31 MAY 2023**  
**CLR. ABOURAAD:/CLR. ZAKHIA**

RESOLVED that

1. The Cash and Investment Report as at 31 May 2023 be received and noted.
2. The Certification by the Responsible Accounting Officer incorporated in this report, be adopted.

- CARRIED

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

**ITEM 7.4**                      **2023-2027 COMMUNITY SAFETY & CRIME PREVENTION PLAN**  
**(469)**                              **CLR. DOWNEY:/CLR. WALSH**

RESOLVED that

1. Council endorses the draft 2023 – 2027 Community Safety & Crime Prevention Plan for Public Exhibition.
2. A further report be brought back to Council following the Public Exhibition.
3. Council engage with Police during the exhibition to establish their infrastructure needs to support this plan.

- CARRIED

**ITEM 7.5**                      **CODE OF MEETING PRACTICE - AMENDMENT TO 2023 SCHEDULE OF MEETINGS**  
**(470)**                              **CLR. ISHAC:/CLR. HARIKA**

RESOLVED that the 2023 Schedule of Council Meetings be amended – whereby the August 2023 Ordinary Meeting of Council be rescheduled from Tuesday, 22 August 2023 to Tuesday, 29 August 2023.

- CARRIED

**SECTION 8:                      SERVICE AND OPERATIONAL MATTERS**

**ITEM 8.1**                      **CAMPSIE ADMINISTRATION BUILDING - REACTIVATION OF COUNCIL MEETINGS**  
**(471)**                              **CLR. DOWNEY:/CLR. CAHILL**

RESOLVED that Council does not proceed with any refurbishment of the former council chambers at Campsie, for the reasons as outlined in the report.

- CARRIED

CLR COOREY REQUESTED THAT HER NAME BE RECORDED AS VOTING AGAINST THIS RESOLUTION.



**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

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AT THIS STAGE OF THE MEETING (8.04 PM), IN ACCORDANCE WITH CLAUSE 15.4 OF THE CODE OF MEETING PRACTICE, HIS WORSHIP THE MAYOR ISSUED A FIRST WARNING TO CLR COOREY FOR AN ACT OF DISORDER.

AT THIS STAGE OF THE MEETING (8.07 PM), IN ACCORDANCE WITH CLAUSE 15.4 OF THE CODE OF MEETING PRACTICE, HIS WORSHIP THE MAYOR ISSUED A SECOND WARNING TO CLR COOREY FOR AN ACT OF DISORDER.

**ITEM 8.2                      COUNCIL UPDATE ELECTRIC VEHICLE CHARGING STATIONS**

**(472)                      CLR. DOWNEY:/CLR. NGUYEN**

RESOLVED that Council develop an Electric Vehicle Charging Strategic Plan to support our community with the uptake of EV's as we transition to zero-emission.

- CARRIED

**ITEM 8.3                      STUDIOVENTURE REVIEW**

**(473)                      CLR. DOWNEY:/CLR. ABOURAAD**

RESOLVED that Continue Studioventure for a further two years and continue to provide photography, videography and podcasting services to local businesses, local non-profit organisations and internal departments within Canterbury-Bankstown Council.

- CARRIED

**SECTION 9:                      COMMITTEE REPORTS**

**(474)                      CLR. ZAKHIA:/CLR. HARIKA**

RESOLVED that in accordance with Council's Code of Meeting Practice, Council adopts all the recommendations of the Committee Reports.

- CARRIED

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

- ITEM 9.1**                      **MINUTES OF THE FLOODPLAIN MANAGEMENT COMMITTEE HELD ON 3 MAY 2023**
- (475)**                        **CLR. ZAKHIA:/CLR. HARIKA**
- RESOLVED that the recommendations contained in the minutes of the Floodplain Management Committee meeting held on 3 May 2023 be endorsed.
- CARRIED
- 
- ITEM 9.2**                      **MINUTES OF THE COMMUNITY & INCLUSION ADVISORY COMMITTEE MEETING HELD ON 15 MAY 2023**
- (476)**                        **CLR. ZAKHIA:/CLR. HARIKA**
- RESOLVED that the minutes of the Community & Inclusion Advisory Committee meeting held on 15 May 2023 be endorsed.
- CARRIED
- 
- ITEM 9.3**                      **MINUTES OF THE UNIVERSAL ACCESS ADVISORY COMMITTEE MEETING HELD ON 7 JUNE 2023**
- (477)**                        **CLR. ZAKHIA:/CLR. HARIKA**
- RESOLVED that the minutes of the Universal Access Advisory Committee meeting held on 7 June 2023 be endorsed.
- CARRIED

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

**ITEM 9.4**                      **MINUTES OF THE TRAFFIC COMMITTEE MEETING HELD ON 13 JUNE 2023**  
**(478)**                        **CLR. ZAKHIA:/CLR. HARIKA**

RESOLVED that the recommendations contained in the minutes of the Canterbury-Bankstown Council Traffic Committee meeting held on 13 June 2023, be adopted.

- CARRIED

**SECTION 10:**              **NOTICE OF MOTIONS & QUESTIONS WITH NOTICE**

**(479)**                        **CLR. ZAKHIA:/CLR. CAHILL**

RESOLVED that in accordance with Council's Code of Meeting Practice, Council adopts all the recommendations of the Notice of Motions and Questions with Notice with the exception of 10.2, 10.3, 10.4, 10.5, 10.6, 10.7 and 10.11.

- CARRIED

**ITEM 10.1**                      **STATUS OF PREVIOUS NOTICES OF MOTION - JUNE 2023**  
**(480)**                        **CLR. ZAKHIA:/CLR. CAHILL**

RESOLVED that the information be noted.

- CARRIED

**ITEM 10.2**                      **LAMBETH RESERVE**  
**(481)**                        **CLR. DOWNEY:/CLR. ABOURAAD**

RESOLVED that Council write to Transport for NSW (TfNSW) requesting a joint investigation into the feasibility of improving pedestrian access across Henry Lawson Drive (HLD) to Lambeth Reserve at Picnic Point.

- CARRIED

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

**ITEM 10.3**                      **BEACONSFIELD AND ALBERT ST ROUNDABOUT**  
**(482)**                              **CLR. DOWNEY:/CLR. WALSH**

RESOLVED that Council investigates the feasibility of constructing a roundabout at the intersection of Beaconsfield and Alberts Streets at Revesby, and to apply for any grant funding available.

- CARRIED

CLR ISHAC TEMPORARILY VACATED THE CHAMBER AT 8.13 PM.

**ITEM 10.4**                      **WE LOVE OUR RIVERS PROJECT**  
**(483)**                              **CLR. NGUYEN:/CLR. ABOURAAD**

RESOLVED that Council acknowledges the staff and community groups that made the We Love Our Rivers campaign a huge success and Council write to those groups thanking them for their participation.

- CARRIED

**ITEM 10.5**                      **DEDICATED CAR SHARE PARKING SPACES IN CANTERBURY BANKSTOWN**  
**(484)**                              **CLR. NGUYEN:/CLR. ABOURAAD**

RESOLVED that Council reviews the provision and possible locations for dedicated car share spaces in the City.

- CARRIED

CLR ISHAC RETURNED TO THE CHAMBER AT 8.15 PM.



**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

**ITEM 10.6**                      **PUBLIC SCREENING - FIFA WOMEN'S WORLD CUP 2023**  
**(485)**                              **CLR. NGUYEN:/CLR. EL-HAYEK**

RESOLVED that Council works with the local football associations and Groups to offer them financial support (up to the value of \$3,000 per event) to host a maximum of three live screening of any of the upcoming games across the City.

- CARRIED

**ITEM 10.7**                      **UPDATED MASTER PLAN FOR JENSEN PARK**  
**(486)**                              **CLR. CAHILL:/CLR. HARIKA**

RESOLVED that

1. At the next Quarterly Review, Council introduce funds to undertake the following:
  - a. Investigate and understand the costs to transition to LED lighting at Jensen Park
  - b. Prepare a concept plan and layout of a new amenities building
  - c. Review and update the 2014 Jensen Park Masterplan
2. Following the above, delivery of these projects then be considered as part of a future review of the Delivery Program and Capital Works Program.
3. Council work cooperatively with the Lions Football Club to achieve the vision outlined in the revised Masterplan.

- CARRIED

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

**ITEM 10.8**  
**(487)**

**BLOCKED BY UTILITIES**

**CLR. ZAKHIA:/CLR. CAHILL**

RESOLVED that Council write to all utilities requesting a change to their procedures where Council is immediately notified of any planned or emergency road closures.

- CARRIED

**ITEM 10.9**  
**(488)**

**FINDING FREEDOM**

**CLR. ZAKHIA:/CLR. CAHILL**

RESOLVED that Council staff be acknowledged for their ongoing efforts in raising awareness about the issues facing refugees, especially during Refugee Week (18 Jun-24 Jun). I further support Council in continuing to advocate on their behalf and to support the Refugee Council promote the "Finding Freedom" theme.

- CARRIED

**ITEM 10.10**  
**(489)**

**COOKS RIVER - CATCHMENT MANAGEMENT**

**CLR. ZAKHIA:/CLR. CAHILL**

RESOLVED that Council write to the NSW Government calling for a review of catchment management across the State with a view of the bringing back greater accountability and ownership of State Government Agencies in the coordination and management of the Cooks River.

- CARRIED

**ITEM 10.11**  
**MOTION**

**RE-ZONING 20-22 WARDELL RD, EARLWOOD**

**CLR. COOREY:/CLR. ZAKHIA**

That Council

1. Receive a report to the July 2023 Council Meeting outlining the considerations and merits of initiating a planning proposal to rezone the lands known as 20-22 Wardell Rd Earlwood from R2 Residential to Open Space Recreation; and funding options for Council to consider in nominating itself as the acquisition authority;

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

2. Council write to Local Federal, State MP's and Inner West Council requesting funds to cover the acquisition of these properties.

- LOST

CLRS ISHAC AND ABOURAAD STOOD FOR A DIVISION.

**For:-** Clrs Abouraad, Akter, Coorey, Ishac, Nguyen and Zakhia

**Against:-** Clrs Cahill, Downey, El-Hayek, Harika, Saleh OAM, Waiba and Walsh

**ITEM 10.12**                      **RECOGNITION OF THE KERSHAW FAMILY**  
**(490)**                              **CLR. ZAKHIA:/CLR. CAHILL**

RESOLVED that Council investigate and report back at or before the October Ordinary meeting regarding the dedication of a park/space in Ashbury, to the Kershaw family, who for over 100 years have made a significant historical and cultural contribution to the suburb.

- CARRIED

**SECTION 11:**                      **CONFIDENTIAL SESSION**

**(491)**                              **CLR. ISHAC:/CLR. ABOURAAD**

RESOLVED that, in accordance with Section 10A(2) of the Local Government Act, 1993, the Public and the Press be excluded from the meeting to enable Council to determine Items 11.1, 11.2, 11.3 and 11.4 in confidential session for the reasons indicated:

Item 11.1 Extinguishment of Easement - 6 Glyn Avenue Picnic Point

*This report is considered to be confidential in accordance with Section 10A(2)(c) of the Local Government Act, 1993, as it relates to information that would, if disclosed, confer a commercial advantage on a person with whom the Council is conducting (or proposes to conduct) business.*

Item 11.2 Canterbury Town Centre Update

*This report is considered to be confidential in accordance with Section 10A(2)(c) of the Local Government Act, 1993, as it relates to information that would, if disclosed, confer a commercial advantage*

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

*on a person with whom the Council is conducting (or proposes to conduct) business.*

*This report is considered to be confidential in accordance with Section 10A(2)(d)(ii) of the Local Government Act, 1993, as it relates to commercial information of a confidential nature that would, if disclosed, confer a commercial advantage on a competitor of the council.*

Item 11.3 The Appian Way Culverts

*This report is considered to be confidential in accordance with Section 10A(2)(c) of the Local Government Act, 1993, as it relates to information that would, if disclosed, confer a commercial advantage on a person with whom the Council is conducting (or proposes to conduct) business.*

Item 11.4 Voyager Point Footbridge - Agreement with Liverpool City Council

*This report is considered to be confidential in accordance with Section 10A(2)(g) of the Local Government Act, 1993, as it relates to advice concerning litigation, or advice that would otherwise be privileged from production in legal proceedings on the ground of legal professional privilege.*

- CARRIED

**COUNCIL RESOLVED INTO CONFIDENTIAL SESSION AT 8.44 PM AND  
REVERTED BACK TO OPEN COUNCIL AT 9.12 PM.**

**ITEM 11.1**  
**(492)**

**EXTINGUISHMENT OF EASEMENT - 6 GLYN AVENUE PICNIC POINT**

**CLR. CAHILL:/CLR. DOWNEY**

RESOLVED that

1. Council consents to the extinguishment of the drainage easement located at 6 Glyn Avenue Picnic Point on the terms outlined in the report.
2. The Mayor and Chief Executive Officer be delegated authority to sign all documentation under the Common Seal of Council, as required.

- CARRIED



**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

**ITEM 11.2**  
**(493)**                      **CANTERBURY TOWN CENTRE UPDATE**  
**CLR. ZAKHIA:/CLR. ABOURAAD**

RESOLVED that Council note the information contained in the report.

- CARRIED

CLR COOREY REQUESTED THAT HER NAME BE RECORDED AS VOTING AGAINST THIS RESOLUTION.

**ITEM 11.3**  
**(494)**                      **THE APPIAN WAY CULVERTS**  
**CLR. ZAKHIA:/CLR. CAHILL**

RESOLVED that

1. Pursuant to Section 55(3)(i) of the Local Government Act 1993, Council agrees to the extenuating circumstances associated with the supply and delivery of precast concrete culverts for The Appian Way, Bankstown Culvert Upgrade, as outlined in the report.
2. Subject to Council's endorsement of Recommendation 1, Council agree that in lieu of inviting tenders, the Chief Executive Officer, carry out a procurement process with suitable suppliers for the supply and delivery of precast concrete culverts for The Appian Way, Bankstown Culvert Upgrade, as outlined in the report.
3. The Chief Executive Officer be delegated authority to prepare and sign all relevant documentation, as required.

- CARRIED

**ITEM 11.4**                      **VOYAGER POINT FOOTBRIDGE - AGREEMENT WITH LIVERPOOL CITY COUNCIL**

In respect of Item 11.4 – Voyager Point Footbridge – Agreement with Liverpool City Council, Clr Ishac declared a Non-significant, Non Pecuniary Conflict of Interest given his work involvement at Liverpool City Council, and as a matter of precaution, he vacated the chamber taking no part in debate.

CLR ISHAC TEMPORARILY VACATED THE CHAMBER AT 9.12 PM AND RETURNED AT 9.13 PM.

**CANTERBURY BANKSTOWN**  
**MINUTES OF THE**  
**ORDINARY MEETING OF COUNCIL**  
**HELD IN COUNCIL CHAMBERS**  
**ON 27 JUNE 2023**

---

**(495)**

**CLR. WALSH:/CLR. DOWNEY**

RESOLVED that

1. Council reaffirms its resolution adopted on 25 August 2020 to repair the Voyager Point Bridge and relinquish on-going maintenance responsibilities through a lump sum payment to Liverpool City Council.
2. The CEO be delegated authority to consider legal options in defending Council's position and the matter reported back to Council upon resolution.

- CARRIED

**THE MEETING CLOSED AT 9.13 PM.**

Minutes confirmed 25 JULY 2023

.....

Mayor

15<sup>th</sup> August 2024

J6372\_01

**Attention:** Department of Planning, Housing and Infrastructure

**Re:** Review of Heritage Assessment  
St Pauls Anglican Church,  
No. 459 Chapel Street, Bankstown

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## 1 Introduction

This letter provides a review of the heritage assessment prepared by GML Heritage (2024) as part of the peer review of the Extent Heritage, heritage study provided to the DPHI as part of its Transport Orientated Development (TOD) State Environmental Planning Policy (SEPP) rezoning of the Bankstown City Centre for the site at St Pauls Anglican Church, No. 459 Chapel Street, Bankstown.

The site of St Pauls Anglican Church is located at 459 Chapel Street, Bankstown on the eastern side of Chapel Street at the intersection of French Avenue. The site is located across three lots, being Lots 26, 27 and 28 of Deposited Plan (D.P.) 7058. Figure 1 illustrates the site and site components.



**Figure 1: The subject site and allotments.**

NearMap 2024; annotations by WPHP

The site is located within Bankstown Local Government Area. The principal planning instrument for the site is the *Canterbury-Bankstown Local Environmental Plan (LEP) 2023*. The site **is not** listed as a heritage item by Schedule 5 Part 1 of the LEP 2023. It is, however, listed as a draft heritage item as

# Weir Phillips Heritage and Planning

part of a heritage study for the draft Bankstown City Centre Masterplan that is being assessed by the Department of Planning, Housing and Infrastructure (DPHI) for Gateway Determination.

The GML Heritage Study includes the following extract from the inventory sheet of Extent Heritage in relation to the significance of the St Pauls Anglican Church:

*St Paul's Anglican Church is of heritage significance at the local level for its historical, associative, aesthetic, social, and representative values.*

*St Paul's Anglican Church is of local historic significance as an Inter War church with later Post War additions that is demonstrative of the development of the suburb of Bankstown in twentieth century. Built in 1938 with later additions in 1961, St Paul's Anglican Church has a strong association with noted ecclesiastical architect, Norman Welland McPherson who was involved with all stages of the Church's construction. McPherson has an extensive portfolio of churches dating from the c.1930s to the mid twentieth century.*

*McPherson was responsible for the design of the 1938 church building and its 1961 front façade and bell tower addition, and the neighbouring 1945 Rectory. The site is also associative [sic.] significance for its longstanding connection with local prominent individuals and families from decades past.*

*The aesthetic significance of the site is embodied in the main church building which is a combination of Inter war and Post-war era design. The church building demonstrates a high degree of creative and technical achievement of the Post War ecclesiastical style with remnant internal Inter War Romanesque features. The front façade and bell tower make a notable contribution to the aesthetic qualities of the site, as well as the highly intact interiors where much of the original/early spatial and structural elements can be readily appreciated, including the exposed timber ceiling, timber trusses, and floorboards. A key feature of the church is the electronic organ which was installed in 1957 and dedicated to fallen WWII soldiers. Other internal features of note include various memorial plaques, timber pews, doorways and stained glass windows. No other buildings on site contribute to the aesthetic values of the site.*

*Although a comprehensive social values study was not undertaken as part of this process, the social significance of the church is apparent from the numerous contributions made by local parishioners extant at the church today. This includes many of the internal fittings, memorial plaques, and stained glass windows. In addition, the 1957 electronic organ was dedicated to fallen WWII soldiers which further signifies the social importance of the church to the local community of Bankstown.*

*The comparative analysis established that St Paul's Anglican Church is of a common and well-represented architectural style in the LGA. While it is one of the few known examples of McPherson's architectural work in the Canterbury Bankstown LGA, there are several well-known and documented examples of McPherson's ecclesiastical work across Sydney.*

*The St Paul's Anglican Church is representative of the development of religious church building in the twentieth century. It is a good representative example of an Inter War Romanesque style church with later Post War ecclesiastical style additions, designed by Norman Welland McPherson.*

*St Paul's Anglican Church meets the threshold for listing at the local level.*

*Heritage recommendations:*

- *St Paul's Anglican Church meets the threshold for local heritage listing under historic significance (criterion a), historical association (criterion b), aesthetic significance (criterion c) and representativeness (criterion g).*
- *The site should be listed as a heritage item under Schedule 5 of the Canterbury- Bankstown LEP 2023.*
- *Conserve the church including its landmark qualities and its corner setting.*



# Weir Phillips Heritage and Planning

- *Conserve original or significant exterior and interior architectural detailing and features when planning change.*
- *Where possible, remove visual clutter from building façades to enhance visual access and streetscape appeal.*

The wider Heritage Study prepared by Extent Heritage was not available in the completion of this report.

## 2 Review against Heritage NSW Criteria

This assessment has been prepared with reference to the Department of Planning and Environment's Assessing heritage significance, Guidelines for assessing places and objects against the Heritage Council of NSW criteria (2023)

Heritage NSW Criteria	GML & Extent Assessment	WPHP Response
<p>Criterion (a)</p> <p>The significance or the importance of a place or object in demonstrating the course or pattern of an area's cultural or natural history may be identified through the application of one or more threshold indicators, including earliness, representativeness, regional or local importance, distinctiveness or exceptionality, rarity, or some other quality of the place</p>	<p>St Paul's Anglican Church is of local historic significance as an Inter War church with later Post War additions that is demonstrative of the development of the suburb of Bankstown in the twentieth century.</p>	<p>St Pauls Anglican Church is an example of an Inter-war Church with later additions. To suggest that the additions to the church somehow contribute to the understanding of Bankstown's development in the twentieth century could apply to any building in the area with later alterations and additions.</p> <p>The site <b>does not</b> meet the threshold for listing under this criterion.</p>
<p>Criterion (b)</p> <p>A place or object has special associational value if it is associated with a person, organisation or group of people who have made an important or notable contribution to the course, pattern and development of our cultural and/or physical environment. In this context, special association may relate not only to the 'great' and well known, but also to the influential, the exemplary, and the innovative.</p> <p>Places or objects that meet this criterion might include those that:</p>	<p>Built in 1938 with later additions in 1961, St Paul's Anglican Church has a strong association with noted ecclesiastical architect, Norman Welland McPherson who was involved with all stages of the Church's construction. McPherson has an extensive portfolio of churches dating from the c.1930s to the mid twentieth century. McPherson was responsible for the design of the 1938 church building and its 1961 front façade and bell tower addition, and the neighbouring 1945 Rectory.</p> <p>The site is also associative [sic.] significance for its longstanding</p>	<p>The Church was designed by Norman Welland McPherson who was a well-known-ecclesiastical architect of the period. Some examples of his work included the Narooma Uniting Church (Heritage Item), St Andrews Anglican Church Roseville, Mosman Uniting Church (heritage item), Eastwood Uniting Church (Heritage Item). These churches, many of which are listed as individual heritage items, all display a level of visual cohesion without later additions confusing the original design intent for the church. Given the level of alteration to this church and also</p>



# Weir Phillips Heritage and Planning

Heritage NSW Criteria	GML & Extent Assessment	WPHP Response
<p>demonstrate strong associations with a particular event, historical theme, people, or philosophies and ideologies</p> <p>are associated with significant historical events, regardless of the intactness of the place or any structure on the place.</p> <p>A place may be considered significant because an important historical figure was said to have lived there and accomplished significant achievements while living there. For example, a house and studio being of state heritage significance as it was associated with an important artist during the most productive period of their career.</p>	<p>connection with local prominent individuals and families from decades past.</p>	<p>given that the design was not executed to the original masterplan designed by McPherson, St Pauls is not considered to be a cohesive or well resolved example of his work.</p> <p>Most churches have strong connections the community that stretch over many decades as they are places where the community meet for both social and religious gatherings. This is no more significant than other community or social groups in the LGA.</p> <p>The site <b>does not</b> meet the threshold for listing under this criterion.</p>
<p>Criterion (c)</p> <p>The significance of a place or object of aesthetic significance may be identified through the application of one or more threshold indicators, including the degree of intactness, integrity, or deterioration of the place, or by its setting and location context, or by demonstrated representation, or by some other quality of the place.</p> <p>A high degree of creative or technical achievement may be identified through the application of one or more threshold indicators, including its intactness, integrity, whether it has received peer recognition or award or some other quality of the place. In some instances, places and objects</p>	<p>The aesthetic significance of the site is embodied in the main church building which is a combination of Inter war and Post-war era design. The church building demonstrates a high degree of creative and technical achievement of the Post War ecclesiastical style with remnant internal Inter War Romanesque features. The front façade and bell tower make a notable contribution to the aesthetic qualities of the site, as well as the highly intact interiors where much of the original/early spatial and structural elements can be readily appreciated, including the exposed timber ceiling, timber trusses, and floorboards. A key feature of the church is the electronic organ which was installed in 1957 and dedicated to fallen WWII soldiers. Other</p>	<p>The division between the Post War ecclesiastical style with remnant internal Inter War Romanesque features does not demonstrate a high degree of creative and technical achievement. Rather the transition between the two styles is awkward and abrupt, compromising both typologies. If the building was in its original form as shown in photographs of the site that exist from the 1930s, then it may have met the threshold for heritage listing under this criterion. However, in its current altered state, the building is not demonstrative of a high degree of aesthetic or creative significance.</p> <p>While the spatial qualities of the interior are readily appreciable, the interiors lack the innovation</p>

# Weir Phillips Heritage and Planning

Heritage NSW Criteria	GML & Extent Assessment	WPHP Response
have been so modified that they no longer meet the state threshold and might be considered of local significance.	internal features of note include various memorial plaques, timber pews, doorways and stained glass windows. No other buildings on site contribute to the aesthetic values of the site.	<p>or technical excellence needed to set this site apart from other churches of the 1930s-1950s period. The slightly lighter face brick in a plain stretcher bond is clearly distinguishable from, and with a clear joint to, the older section. The exposed roof continues the timber rafters and lining of the original section, but the timber trusses have been replaced by utilitarian contemporary steel I-beams that meet the walls in an unmediated manner, contributing to an overall unremarkable interior. The church lacks any technical or creative achievement in terms of its construction methodology for the period.</p> <p>The dedication to WWII soldiers in the form of the electronic organ and faux pipes can be salvaged or reinterpreted in a new space. Given that this organ was not the original pipe organ in the church, the organ other than the dedication does not contribute to the significance of the church.</p> <p>The site <b>does not</b> meet the threshold for listing under this criterion.</p>
<p>Criterion (d)</p> <p>The significance of a place that has a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons may be identified through the application of one or more threshold indicators, including the length of association for a community, the degree or extent of the association or</p>	<p>Although a comprehensive social values study was not undertaken as part of this process, the social significance of the church is apparent from the numerous contributions made by local parishioners extant at the church today. This includes many of the internal fittings, memorial plaques, and stained glass windows. In addition, the 1957 electronic organ was dedicated to fallen WWII soldiers which</p>	<p>While the congregation is associated with the church, as is typical for all churches, there is no evidence indicating that this association was unusually strong or distinctive enough to make the site particularly special. Stained glass windows, memorial plaques, including those to WWI and WWII Soldiers, and fittings are common in most churches across New South Wales. Objects of social importance are directly</p>



# Weir Phillips Heritage and Planning

Heritage NSW Criteria	GML & Extent Assessment	WPHP Response
attachment, a significant former association for a community or some other quality of the place.	further signifies the social importance of the church to the local community of Bankstown.	associated with the congregation and as occurs with congregations, can move with the congregation as and when this may occur  The site <b>does not</b> meet the threshold for listing under this criterion.
<i>Criterion (e)</i>  <i>The significance of the potential of a place or object to reveal information that contributes significantly to our understanding of NSW's history may be identified through the application of one or more threshold indicators, including earliness, rarity, extensiveness, intactness or some other quality of the place. Almost all places or objects of cultural heritage significance have the potential to yield information in some way; however, this 'potential to yield', or the degree to which a place or object may contribute to our understanding of an area's past, must be qualified by a strong presumption that a place or object has research potential.</i>	Not noted in the information supplied in the heritage assessment prepared by Extent Heritage that addresses this Criterion.	n/a  The assessment does not suggest that either section of the Church or the outbuildings demonstrate construction techniques that were rare for their times or are of research interest. Assessment of archaeological potential is outside the scope of the original assessment.
<i>Criterion (f)</i>  <i>The significance of the rarity or uncommonness of a place may be identified through the application of one or more threshold indicators, including intactness/integrity, distinctiveness, exceptionality or some other quality of the place or object.</i>	The comparative analysis established that St Paul's Anglican Church is of a common and well-represented architectural style in the LGA. While it is one of the few known examples of McPherson's architectural work in the Canterbury Bankstown LGA, there are several well-known and documented examples of McPherson's ecclesiastical work across Sydney.	The authors of this statement concur with the conclusions of this assessment, agreeing that the church is not rare. Given McPherson's prolific ecclesiastical work across Sydney and NSW over several decades, there are many intact examples of his work.  The site <b>does not</b> meet the threshold for listing under this criterion.



Heritage NSW Criteria	GML & Extent Assessment	WPHP Response
<p><i>Criterion (g)</i></p> <p><i>The significance of a place illustrates the principal characteristics of a class of cultural places. It may be identified through the application of one or more threshold indicators, including the degree of intactness/integrity, earliness, rarity or uncommonness, sustained use, exceptionality, or some other quality of the place.</i></p>	<p>The St Paul's Anglican Church is representative of the development of religious church building in the twentieth century. It is a good representative example of an Inter War Romanesque style church with later Post War ecclesiastical style additions, designed by Norman Welland McPherson.</p>	<p>The undefined hybrid style of the church is not of sufficient architectural note to be considered a rare characteristic in NSW. If the church were designed wholly in either of the styles it represents, it might be considered rare within the LGA. However, given that there are already at least eight listed churches and church halls in the LGA, this typology is already well-represented and is therefore not rare within the LGA.</p> <p>The site <b>does not</b> meet the threshold for listing under this criterion.</p>

### 3 Summary

St Pauls Anglican Church is an example of an Inter-war Church with major later additions, designed by ecclesiastical architect Norman Welland McPherson. The church lacks the architectural cohesion and intactness found in many of McPherson's other works, a number of which are listed as heritage items. The church's hybrid style, combining Inter-war and Post-war elements, is awkward and does not demonstrate high creative or technical achievement.

The church's interior, though spatially appreciable, lacks innovation and technical excellence. The dedication to WWII soldiers, while having significance, is typical of many churches. Such memorials are associated with the congregation, as noted above. The church's association with its congregation is typical of most churches and does not indicate any unique significance. The architectural typology as a church is not rare, as there are already numerous listed churches and church halls in the LGA.

St Pauls Anglican Church should not be heritage listed for several reasons:

- **Lack of Architectural Integrity:** The church's later additions disrupt the original design intent, leading to a lack of visual cohesion and compromising the original architectural vision as intended by McPherson.
- **Hybrid Style:** The transition between Inter-war and Post-war styles is awkward and does not represent a high degree of creative or technical achievement.
- **Unremarkable Interior:** The interior lacks innovation and technical excellence, with utilitarian steel I-beams replacing the original timber trusses. The church lacks any technical or creative achievement in terms of its construction methodology for the period.
- **Diminished Community Association:** The church's connection to its congregation is typical and not unusually strong or distinctive when compared with other social or religious groups in the locality.

# Weir Phillips Heritage and Planning

- **Well-Represented Typology:** The church typology is not rare within the LGA, which already has numerous heritage listed churches and church halls.

In its current altered state, St Pauls Anglican Church Bankstown **does not meet** the threshold for heritage listing under the Heritage NSW criteria for heritage listing as a local heritage item under the *Canterbury-Bankstown Local Environmental Plan (LEP) 2023*.

### **3.1 General Discussion in relation to the Church and development of Bankstown as a result of the TOD SEPP.**

A large number of Christian churches of all denominations are listed as heritage items. Although they typically receive listing under a number of the seven standard Heritage NSW criteria, in today's cultural landscape, the most common areas of significance lie in their aesthetic and historical significance. These are the most recognisable significances in terms of the wider community. Social significance, on the other hand, holds direct importance to the congregation as it goes to continuity of worship and the sense of community this imbues.

While the wider community wants historic and beautiful churches to be conserved; they are not particularly concerned with the requirements of the congregation or with the financial requirements arising from the maintenance of churches. The wider community has an expectation that these churches will be conserved but are happy to place the financial burden of the conservation on the congregation, even if heritage status is imposed by Local Government. Certain churches assume immense historic and aesthetic importance to the wider community; however, St Paul's does not. It is not a significant example of ecclesiastical architecture as demonstrated by the above the assessment against the NSW Heritage Criteria.

St Paul's Anglican Church has had a long history of development, and additions to cope with the changing needs of the community. This expansion ran parallel with the expansion of the suburb which grew rapidly following the development boom in Sydney post WWII. The Church requires the freedom to address its current and future requirements in a comprehensive manner with a planning scheme which would enable them to meaningfully address and fund their accommodation requirements for a growing congregation, ministry and outreach whilst providing affordable housing for the community. It is important to consider the Church's place within the broader urban context of Bankstown.

This projected growth of Bankstown as a result of the TOD SEPP has the potential to have impacts on the Church that are physical, spiritual and service based. The Church is looking to the future in terms of how it caters for the growth of its diverse congregations. This includes the active consideration of providing a range of spaces suited to the worship requirements of the various congregations and the ability for those spaces to serve them. Whilst providing an opportunity for all members of the community to have the opportunity to access affordable housing. The Church must consider how these communities will evolve over time and whether new communities will emerge who will also require space for their services and for important religious, cultural and community events. The introduction of new housing and jobs has the potential to further swell the congregation of the Church. While new worshippers may be able to join the existing congregations, the influx of people also has the potential to create completely new congregations. New service requirements will arise from the increase in pastoral care that the Church offers to the community. Increased space and new office facilities will be required to fulfil these services. A heritage listing for the site will diminish limit the ability of the Church to provide these services and affordable housing which is in line with the projected growth of Bankstown.

# Weir Phillips Heritage and Planning

The most significant element of a church is not its buildings, but its congregation. If a building associated with the church is not of high historic or architectural merit, as is the case on this site, then a strong argument can be made for its removal and replacement with a building fit for purpose and provide for additional funds to support the church's ongoing function and the needs of the wider community through affordable housing.

Please do not hesitate to contact me on [REDACTED] if you have any questions.

Yours faithfully,

A handwritten signature in dark ink, appearing to read 'James Phillips', with a stylized flourish at the end.

**James Phillips** | Principal

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 11:46:21 AM  
**Attachments:** [bankstown-tod-submission-from-bishop-peter-lin.pdf](#)

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Submitted on Thu, 29/08/2024 - 11:44

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Peter

### **Last name**

Lin

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Sydney 2000

### **Please provide your view on the project**

I object to it

### **Submission file**

[bankstown-tod-submission-from-bishop-peter-lin.pdf](#) (104.89 KB)

### **Submission**

Please refer to my attached letter.

### **I agree to the above statement**

Yes



**NSW Department of Planning, Housing and Infrastructure (DPHI)**

*Via NSW Planning Portal*

**29 August 2024**

To whom it may concern,

**BANKSTOWN TOD REZONING PROPOSAL – SUBMISSION FROM BISHOP PETER LIN**

Thank you for the opportunity to provide input to the Bankstown Transport Oriented Development (TOD) rezoning proposal, which I broadly support with one important exception – the proposed listing of St Paul's Anglican Church at Bankstown as a local heritage item.

I believe the proposed listing would have a number of serious, unintended consequences including:

- preventing the delivery of a stock of social and affordable housing at a time when and in an area where this essential social infrastructure is sorely needed; and
- threatening the viability of St Paul's as an active and thriving contributor to the local community, which this congregation has served for generations.

In terms of the detailed planning considerations relating to this objection, I note the submission made by Sydney Anglican Property outlining the Diocese's overall position. However, as Bishop of South Western Sydney, I feel compelled to underscore the importance of these two consequences in particular, as they compromise one of the primary roles of any Anglican church – to minister to the felt needs of their local community in ways that reflect the love of Christ.

*Social and affordable housing*

The Diocese currently has plans for the St Paul's Bankstown site that would provide 139 social and affordable dwellings via a proposal lodged under the Housing Australia Future Fund initiative. This proposal was developed on the basis that there were no heritage constraints on the site.

Importantly, and in demonstration of our commitment to serve the local community rather than maximise financial return, the Diocese has decided to commit 100% of the proposed housing stock on the site to social and affordable housing, instead of just 15% as required under the TOD principles.

The proposed heritage listing of the St Paul's Bankstown site clearly jeopardises the potential to realise this significant community benefit.

*Viability of the St Paul's congregation*

Despite possessing a number of important and beautiful historical buildings, the Diocese is clear in its conviction that the local church exists primarily as the gathered congregation, not the building in which they meet. As such, it is important that any buildings managed by the parish are able to serve the congregation (and its ministry in the local community) not the other way around. Without the opportunity to redevelop the site, this aged and now inadequate facility will further reduce its already hampered ability to meet community needs (such as the Food Pantry, ESL and so forth), as well as the ministries of the church.

The proposed heritage listing of the site would effectively relegate several buildings (hitherto not considered of heritage significance) to the status of "museum pieces" at the expense of the many vibrant ministry and community activities that could otherwise be pursued on the site. Moreover, the associated maintenance costs would be a significant burden for the local congregation, putting the ongoing viability of St Paul's at real risk and further endangering the church's ability to minister to the local community.

Redevelopment of the site, on the other hand, would allow the delivery of modern, fit-for purpose facilities catering to the expected growth in the local population, including facilities that local community groups would be able to use.

Once again, thank you for the opportunity to make a submission on this important rezoning proposal. The considerations outlined above relate predominantly to the ongoing ministry of St Paul's Bankstown, which would be seriously undermined by the proposed heritage listing. I believe these considerations complement the other more technical heritage and planning-related matters outlined in the Sydney Anglican Property submission to form a compelling case for rejecting the proposed listing.

I understand the local congregation is overwhelmingly in support of the proposed redevelopment of its site and, as such, also objects to the site being heritage listed.

As a Diocese, we want to honour the history of St Paul's Bankstown. However, the best way to do so is not by retaining items of low heritage significance, but by ensuring the site (and the congregation that meets there) is able to provide the local community with the kind of social infrastructure and care it will undoubtedly benefit from as it grows and develops for generations to come.

Yours faithfully,



**The Right Reverend Peter Lin**  
Bishop of the South Western Region  
[plin@sydney.anglican.asn.au](mailto:plin@sydney.anglican.asn.au)

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 11:48:38 AM  
**Attachments:** [bankstown-tod-letter-and-petition.pdf](#)

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Submitted on Thu, 29/08/2024 - 11:36

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Peter

### **Last name**

Ko

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown 2200

### **Please provide your view on the project**

I am just providing comments

### **Submission file**

[bankstown-tod-letter-and-petition.pdf](#) (3.22 MB)

### **Submission**

See attached.

### **I agree to the above statement**

Yes

# St Paul's Anglican Church, Bankstown

461 Chapel Road, Bankstown, NSW, 2200 :: (02) 9790 1883 :: [www.bankstownanglican.com](http://www.bankstownanglican.com)

## **Submission re Bankstown TOD rezoning from Pastor Peter Ko**

23 August 2024

To whom it may concern,

### **BANKSTOWN TOD REZONING PROPOSAL SUBMISSION**

As the pastor of St Paul's Anglican Bankstown, I wish to thank you for the opportunity to provide feedback on the Bankstown Transport Oriented Development (TOD) rezoning proposal. The TOD in general has many commendable aspects. However, my concern and feedback below are about the proposed listing of St Paul's Bankstown as a local heritage item.

I am concerned that this heritage listing could lead to several serious unintended consequences, including:

- Hindering our ability as a parish to continue to serve the needs of our existing members and the wider local community, which we have done for generations.
- Preventing the development of social and affordable housing in Bankstown in conjunction with the major tenets of the TOD.

### ***Serving the needs of the Bankstown parish and community***

Our conviction is that the local church exists primarily as the gathered congregation, not the building in which we meet. As such, it is important that any of our parish buildings can serve our congregation (and our ministry in the local community), and not the other way around. Without the opportunity to redevelop the site this aged and now inadequate facility will further reduce our already hampered ability to meet community needs (such as the Food Pantry, English classes, playtime, counselling services), as well as the ministries of the church.

The proposed heritage listing of the site would effectively relegate several buildings of none or low heritage significance to the status of "museum pieces" at the expense of the many vibrant ministry and community activities that could otherwise be pursued on the site. Moreover, the associated maintenance costs would be a significant burden for our local congregation, putting the ongoing viability of St Paul's at real risk and further endangering our ability to minister to the local community.



As it stands, we do not even have enough hall space for our growing children's ministry and are currently in negotiations with the community centre next door to hire extra classroom space.

Redevelopment of the site would allow the delivery of modern, fit-for purpose facilities catering to the expected growth in our congregations and the local population, including facilities that local community groups would be able to use.

### ***Social and affordable housing***

We are very supportive of the Diocesan plan to develop 139 social and affordable housing units on the St Paul's Bankstown site under the Housing Australia Future Fund initiative. Furthermore, their decision to allocate 100% of the proposed housing on this site to social and affordable units will be of great benefit to the city of Bankstown. All these plans were made with the understanding that there were no heritage constraints on the site. The proposed heritage listing would jeopardise the realisation of this significant community benefit.

Our local congregation is **strongly in favour of redeveloping** its site and opposes the heritage listing. A recent petition (attached) gained over 100 signatures of **currently attending adult parishioners** (note that our average Sunday attendance across services is around 100 adults each week). That speaks to our commitment to see the buildings of St Paul's Bankstown serve the city of Bankstown for generations to come, unhindered by heritage considerations.

Once again, I appreciate the opportunity to contribute to this important rezoning proposal. The points I've raised primarily concern the ongoing ministry of St Paul's Bankstown, which would be severely undermined by the proposed heritage listing.

Kind regards,



Rev. Peter Ko

Pastor of St. Paul's Anglican Church Bankstown

[Redacted]  
[Redacted]

# **PETITION**

## **To the Department of Planning, Housing and Infrastructure (the Department)**

We, the undersigned parishioners of St Paul's Bankstown Anglican Church (459-461 Chapel Road, Bankstown NSW 2200), hereby petition the Department **to remove the proposed heritage-listing of the church site from the Bankstown TOD rezoning proposal.**





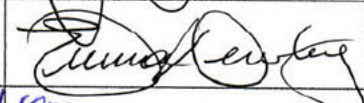
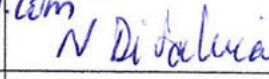


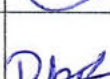
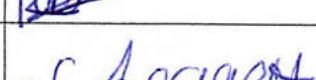


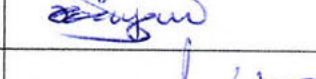
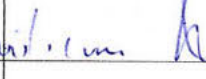



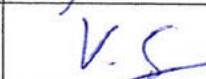
We note for the record, the following failed prior attempts to heritage list the church site:

- A motion for the site to be heritage-listed was lost at the Canterbury-Bankstown Council meeting on 26 April 2016.
- We note that the Canterbury Bankstown Local Planning Panel supported the site being redeveloped from the meeting minutes of the 9 September 2021 meeting as there was no recommendation to heritage list the site.
- We note that an attempt to place a second Interim Heritage Order over the site did not proceed as recorded in the Council meeting minutes on 27 June 2023.


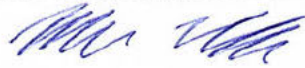









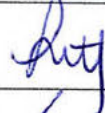





It is our view that heritage-listing the St Paul's site will have significant negative impact to current and future generations of the church for the following reasons:

- There is no valid or sustainable argument that justifies the imposition of a heritage listing over the entire site (including both church building and hall);
- To meet the needs of the growing and culturally diverse City, the St Paul's site has evolved to accommodate various building additions and structures with a mission of worshipping God whilst also ministering to and serving the people of Bankstown;
- It will constrain the church from flourishing and providing renewed fit-for-purpose ministry and community facilities;
- It will constrain the church's ability to improve our engagement and connection with the local community, who are those that we seek to serve and support through provision of new facilities and support services;
- The church has a strong desire to address the pressing need for social and affordable housing for our local community and heritage listing will 100% put a stop to any future chances we have to meet this goal;
- It will prevent a development vision aligned with the original Canterbury-Bankstown Council Master Plan which would ensure that St Paul's can continue to service future generations in Bankstown while also appropriately commemorating the contribution of parishioners and ministers from years gone by.

The undersigned petitioners therefore ask the Department to remove the proposed heritage-listing of the St Paul's Bankstown Anglican Church from the Bankstown TOD rezoning proposal.



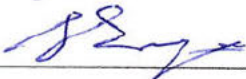


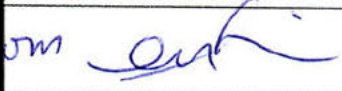

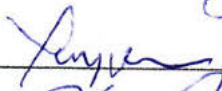
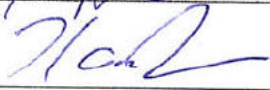





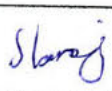
Name	Property Address or Email	Signature	Parishioner Y/N
Rose Garcia			Y
Daniel Gomez			Y
Scott Newling			Y
Emma Newling			Y
Ngarie Di Salvo		 N Di Salvo	Y
Peter Ko			Y
Sarah Tang			Y
Ruby Wilson			Y
Caroline		 Caroline Leggett	Y
Matthew Peck			Y
Hemma Tang Tan			Y
Wendy Peck		 Wendy Peck	Y
Jason Ng			Y
Nelson Sun			Y
Karen Ko			Y
Virginia Chung			Y
Linh To			Y

The undersigned petitioners therefore ask the Department to remove the proposed heritage-listing of the St Paul's Bankstown Anglican Church from the Bankstown TOD rezoning proposal.




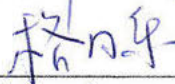



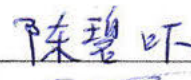


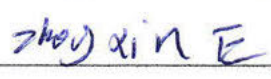
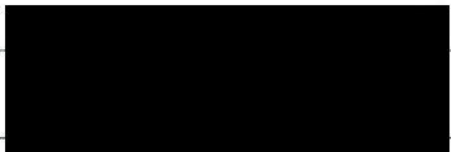

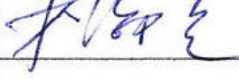
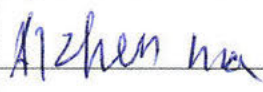

Name	Property Address or Email	Signature	Parishioner Y/N
Jon Walsh			Y
Lien Walsh			Y
KEIRAN SAMPSON			Y
Corinne Sampson			Y
Sandra Oteme			Y
Diana Chan			Y
Jeffrey Lee			Y
Patrick Sanchez			Y
Thien Tong			Y
Linda Chung			Y
Jorn Tam			Y
Sarah Lian			Y
Lisa Tuong			Y
Kenzi HUYNH			Y
Debbie Lai			Y
Festus OMDREGE			Y
LISA ONG			Y



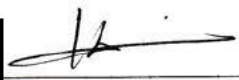
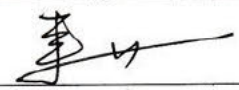

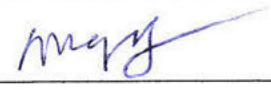
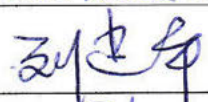
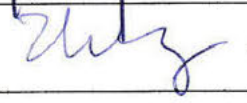

The undersigned petitioners therefore ask the Department to remove the proposed heritage-listing of the St Paul's Bankstown Anglican Church from the Bankstown TOD rezoning proposal.

Name	Property Address or Email	Signature	Parishioner Y/N
Dominic Cheung			Y
Steph Wong			Y
Jared Wong			Y
Rebecca Nguyen			Y
Tun Pin ONG			Y
PHIN TANG			Y
Xuyen Tang			Y
Kam Ho			Y
BRYAN CHRISTIAN LEE			Y
Thushy Hui			Y
Jamie Lee			X
Anthony Allingham			Y
Derek Truong			Y
Sharon Januettanapradit			Y

The undersigned petitioners therefore ask the Department to remove the proposed heritage-listing of the St Paul's Bankstown Anglican Church from the Bankstown TOD rezoning proposal.

Name	Property Address or Email	Signature	Parishioner Y/N
Li Tuan Hock			Y
Chim Hsuan Chen			Y
Rib Gb			Y
CHUN (SHAN)			Y
Lin xiang			Y
SAU WAN ZI			Y
Bi xia chen			Y
Ching Pak Koi			Y
SHENG XIONG ZHONG			Y
XIN E ZHONG			Y
Glerry Lee			Y
Yutong Zhu			Y
Al zhen mn			Y
NGOC Mai Z			Y

The undersigned petitioners therefore ask the Department to remove the proposed heritage-listing of the St Paul's Bankstown Anglican Church from the Bankstown TOD rezoning proposal.

Name	Property Address or Email	Signature	Parishioner Y/N
Kitty WANG			Y
CHING HUA - WANG			Y
Eun Sung Kim			Y
Mary Chea			Y
Jianying Zhao		Jianying Zhao	Y
Ling Yu		Ling Yu	Y
Jianhua Lin		Jianhua Lin	Y
Jianping Lu			Y
Zhong Wang			Y
Lin		id.com - Lin	Y
Yu Zhong Hu		Zhong Hu	Y
Jiang Yue Ying		Yue Ying	Y
Feng Xu Wei		冯旭伟	Y
MANG MACH			X
NU LA		NU LA.	Y
Hiroko		KIKU S I S S <del>Hiroko</del>	Y
Li Guo Ji 999		com JI	Y



	Timestamp	Full Name	Email or Home Address	By selecting 'YES' I verify my digital signature and that I am a current parishioner of St Paul's Bankstown
1	8/10/2024 8:29:13	Maxwell John Heinecke		Yes
2	8/10/2024 8:31:57	Nina Heinecke		Yes
3	8/11/2024 14:01:23	Jason Tang		Yes
4	8/11/2024 14:02:39	Clement Tang		Yes
5	8/11/2024 14:07:11	Tek Gou		Yes
6	8/11/2024 14:14:46	Julie Ho		Yes
7	8/11/2024 14:29:13	Neville Tang Yan		Yes
8	8/11/2024 14:36:18	Andrew Phan		Yes
9	8/11/2024 14:37:26	Jenny To		Yes
10	8/11/2024 14:38:33	Vanessa Leung		Yes
11	8/11/2024 14:46:18	Sally Tran		Yes
12	8/11/2024 14:50:19	Queena Yeung		Yes
13	8/11/2024 14:55:19	Ross Whelan		Yes
14	8/11/2024 14:56:11	Lynn Whelan		Yes
15	8/11/2024 14:57:32	Ivan Lee		Yes
16	8/11/2024 14:59:24	Vanessa Lee		Yes
17	8/11/2024 15:01:12	Jessica Yeung		Yes
18	8/11/2024 15:02:25	Ming En Chin		Yes
19	8/11/2024 15:57:19	Linda Chung		Yes
20	8/11/2024 17:38:18	Mey Teoh		Yes
21	8/11/2024 17:45:39	Joanne Lee		Yes
22	8/11/2024 17:46:04	Alex Chang		Yes
23	8/11/2024 18:34:22	SweeYeng Phang		Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 1:01:35 PM

---

Submitted on Thu, 29/08/2024 - 13:01

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Onur

### **Last name**

Kiraz

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I am just providing comments

### **Submission**

Dear Sir/Madam,

I am writing to formally object to the Bankstown rezoning masterplan currently under consideration. My primary concern is the inadequate density proposed in the areas surrounding the newly announced hospital, the soon-to-be-constructed metro station, and the existing shopping centres. Increasing the density in these areas is crucial for the following reasons.

Increasing density around the metro station will significantly reduce commute times for residents. With more housing options in close proximity to the station, more people can rely on public transport rather than private vehicles. This shift will decrease road congestion, lessen travel times, and improve overall efficiency of the transportation network. Shorter commutes also contribute to a higher quality of life, reducing stress and

giving residents more time for personal and family activities.

Higher density in proximity to the shopping centres will drive economic growth by boosting foot traffic and increasing the viability of retail and service businesses. More residents in the area will lead to greater demand for local goods and services, which in turn supports job creation and local business sustainability. A well-planned density increase can create a vibrant local economy, making the shopping centres more attractive to a diverse range of businesses and services.

The newly announced hospital and the future metro station represent significant public investments. These facilities are designed to cater to large populations and alleviate congestion. To ensure that these investments yield the highest return, it is essential to maximise the surrounding residential and commercial density. By doing so, we ensure that these facilities are fully utilised and that the economic benefits are spread throughout the community. Underutilisation of this infrastructure would result in wasted potential and increased operational costs per capita, ultimately diminishing the value of these significant investments.

Maximising density near critical infrastructure can contribute to increased housing supply, which can help alleviate housing affordability issues. By providing more housing options in well-connected areas, we can better accommodate a growing population and potentially lower property prices due to increased competition among developers and a greater supply of housing. This, in turn, can help make the area more accessible to a broader demographic.

The new hospital is a critical healthcare resource, and its success depends on a sufficient patient base. Increased density in the surrounding area ensures that the hospital can attract and retain healthcare professionals and offer a comprehensive range of services. Without adequate residential density, the hospital may struggle to achieve its intended capacity and service levels.

Thank you for considering my concerns.

Onur Kiraz

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 2:31:25 PM

---

Submitted on Thu, 29/08/2024 - 14:31

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Irmak

### **Last name**

Ceren

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I object to it

### **Submission**

Dear Sir/Madam,

I am writing to express my concerns and objections regarding the current Bankstown TOD rezoning masterplan, specifically regarding its proposed density levels. The plan, as it stands, does not provide adequate density around the newly announced hospital, the upcoming metro station, and existing shopping centres.

Higher density facilitates mixed-use development, where residential, commercial, and recreational spaces coexist. This type of development promotes a lively urban environment and reduces the need for long commutes between home, work, and leisure activities. Mixed-use areas are more efficient and sustainable, offering residents everything they need within a short distance. This integration of uses supports a more cohesive and functional urban area.

A higher density population supports the development and maintenance of community facilities, such as schools, libraries, and recreational centres. With more residents in the area, there is greater demand for these facilities, which can lead to improved services and more comprehensive offerings. Without sufficient density, the community may struggle to support and sustain these essential facilities, impacting overall quality of life.

A denser, well-planned urban environment can greatly enhance the quality of life for residents. Proximity to essential services like the hospital, public transport, and shopping centres makes daily life more convenient and enjoyable. Additionally, well-designed high-density developments often include parks, recreational facilities, and community spaces that contribute to a better living environment. Increased density ensures that these amenities are within easy reach, promoting a healthier and more connected community.

Increased density promotes walkability, which is the ease with which residents can walk to various destinations. Higher density development around the metro station and shopping centres creates a more pedestrian-friendly environment, encouraging walking and cycling as primary modes of transport. Walkable areas are associated with numerous benefits, including improved health outcomes, reduced traffic congestion, and a stronger sense of community.

The substantial investment in the new hospital and metro station is intended to serve a large population and enhance community services. Without sufficient density in the surrounding areas, these facilities may not achieve their intended impact. Increased residential and commercial density around these sites ensures that the infrastructure is used to its full potential, supporting its financial viability and operational efficiency. By aligning development density with the capacity of these facilities, we can secure a better return on public investment and ensure that these resources are effectively utilised.

I strongly urge the Department to reconsider the proposed density levels and make adjustments that better reflect the strategic importance of these areas.

Kind Regards,  
Irmak

**I agree to the above statement**  
Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 2:45:22 PM

---

Submitted on Thu, 29/08/2024 - 14:45

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Kadri

### **Last name**

Karahan

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I am just providing comments

### **Submission**

Dear DPHI,

I am troubled by the insufficient density proposed in the areas surrounding the newly announced hospital, the soon-to-be-built metro station, and the existing shopping centres. I believe that a higher density is critical in these areas for a multitude of reasons.

A denser population supports a stronger local economy by providing a larger market for businesses and services. Increased density leads to more economic activity, which can help businesses thrive and attract new ventures. This economic strength fosters job creation and supports a diverse range of local services, contributing to the overall economic health of the community. Without adequate density, the local economy may struggle to grow and sustain itself, impacting residents and businesses alike.

Increasing density helps address housing demand by providing a greater supply of residential units in well-connected areas. With more housing options near the metro station and hospital, we can better accommodate a growing population and potentially alleviate housing affordability issues. This increased supply supports a diverse housing market and ensures that more people have access to suitable living options. Without sufficient density, housing demand may exceed supply, leading to higher prices and reduced affordability.

The new hospital and the future metro station are significant public investments intended to serve a broad community. To fully leverage these investments, it is essential to increase density in their vicinity. Higher density ensures that these facilities can operate efficiently and be used to their full potential. With a larger resident base, the hospital can achieve higher patient volumes, and the metro station can cater to a greater number of commuters, thereby enhancing the return on investment for taxpayers and making the facilities more viable long-term.

The new hospital is designed to provide comprehensive healthcare services to a broad population. For the hospital to operate effectively and deliver high-quality care, it needs a robust patient base. Increased density in the surrounding areas ensures that more people have convenient access to the hospital, which can improve public health outcomes and make the facility more sustainable. Insufficient density may limit the hospital's patient throughput and impact its ability to offer a full range of services.

Higher density around shopping centres can substantially boost local economic activity. More residents living near these centres will naturally lead to increased foot traffic, which benefits retailers and service providers. This heightened activity attracts more businesses, fosters economic growth, and enhances the diversity of retail and service options available to residents. Without sufficient density, shopping centres may experience reduced business viability, limiting economic development and potentially leading to a decline in available services.

Regards,  
Kadri

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 2:47:48 PM  
**Attachments:** [goget-response-to-bankstown-tod-rezoning-proposal.pdf](#)

---

Submitted on Thu, 29/08/2024 - 14:46

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Katya

### **Last name**

Eagles

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

2200

### **Please provide your view on the project**

I support it

### **Submission file**

[goget-response-to-bankstown-tod-rezoning-proposal.pdf](#) (128.4 KB)

### **Submission**

Please, see GoGet's submission attached

### **I agree to the above statement**

Yes

# GoGet Submission to Bankstown State-led Rezoning Proposal

## Introduction

GoGet, Australia's first and largest professional carshare service provider, supports the Rezoning Proposal to amend planning controls in Bankstown under the TOD Program. We believe this initiative is a crucial step towards creating a more sustainable, affordable and liveable urban environment.

In addition to the amendments proposed by the Department of Planning, Housing and Infrastructure, GoGet strongly encourages the inclusion of the following 5 key transport initiatives to ensure the best possible outcomes for all future residents and tenants of the Bankstown TOD Rezoning Precinct:

1. Abolish Parking Minimums
2. Allow Carshare to Reduce Required Parking (if there are parking minimums)
3. Encourage On-Street Parking Restrictions
4. Carshare Requirements for Developments With Low Car Parking
5. Standardise Strong Development Consent Condition Wording

By incorporating these five transport initiatives into the TOD framework, we can create a thriving community that prioritises people over cars, fostering increased density, reduced car dependency, and an improved quality of life for residents while minimising environmental impact.

## Recommendations

### 1. Abolish Parking Minimums

We wholeheartedly endorse the abolition of parking minimums within Transport Oriented Development Precincts. By removing this outdated requirement, the Bankstown TOD rezoning proposal can unlock the full potential of the precinct by:

- **Increasing housing affordability:** Reducing the cost of development by eliminating the need for costly parking infrastructure.
- **Promoting sustainable transport:** Encouraging residents to choose public transport, walking, cycling, and carsharing over private car ownership.
- **Optimising land use:** Allowing for more efficient use of space for community amenities, green spaces, and other essential infrastructure.

### 2. Allow Carshare to Reduce Required Parking

Allow one carshare space to replace 10 private parking spaces within a development. Any greater parking reduction must be supported by a traffic and parking study. Carshare service providers can assist with the traffic and parking studies with their local membership and utilisation data. This will also ensure that carshare providers are being engaged at an early enough stage that changes to the onsite parking mix can still be considered. For reference, the NSW Land and Environment Court has approved parking replacement ratios of 1:10 on multiple occasions.

### 3. Encourage On-Street Parking Restrictions



To further accelerate the shift towards sustainable transport, we recommend the following:

- **Implement on-street parking restrictions:** Discourage unnecessary car ownership by removing residents' access to free on-street parking (storage).
- **Prevent permit exemptions:** Ensure all new apartment buildings do not receive exemptions from parking restrictions.

By adopting these measures, the Bankstown TOD can become a leading example of a car-lite, people-centred urban development. GoGet stands ready to partner with the Council and developers to deliver a successful TOD that prioritises sustainability and community well-being.

#### 4. Carshare Requirements for Developments With Low Car Parking

Where dwellings are provided without a car parking space, carshare parking is to be integrated into the development at the following rates:

- 1 carshare space / first 5 units without car parking
- 1 carshare space / 20 units without car parking thereafter

Linking carshare provision directly to the number of units without allocated parking spaces offers a precise and effective approach to ensuring adequate carsharing infrastructure within developments. This methodology recognises that residents without access to on-site parking are more likely to rely on carshare services.

By establishing a clear threshold of five car-less dwellings before carshare spaces become mandatory, the policy avoids imposing unnecessary burdens on smaller developments while guaranteeing sufficient carsharing options for larger projects. The proposed tiered system of one carshare space for every 5-15 car-less dwellings, two for 16-35, and so on, provides a scalable framework that can be adjusted based on future data and evaluation. This approach ensures a proportional relationship between the number of car-less residents and the available carshare resources.

Rounding up or down the number of required carshare spaces prevents fractional requirements, simplifying compliance and avoiding potential disputes. This practical solution maintains the integrity of the policy while accommodating variations in development sizes.

Requiring carshare spaces in developments with reduced on-site parking promotes sustainable and equitable transportation options. By providing accessible carsharing services, these developments can cater to residents who cannot afford or choose not to own a car while also reducing reliance on private vehicles. This approach contributes to improved air quality, reduced traffic congestion, and healthier communities by encouraging the use of public transport, cycling, and walking. Ultimately, carsharing serves as a flexible and environmentally friendly solution for occasional car use within a predominantly low-car environment.

#### 5. Standardise Strong DA Condition Wording

When developments are approved with onsite carshare requirements, it is important for carshare to be included in the conditions of the Development Approval. These conditions are to be enforceable to ensure that the Responsible Authority can verify that developers and subsequent owners' corporations have entered into an agreement with a carshare operator to fulfil the requirement.

Ideal conditions should state:

Ph: **1300 769 389** Email: [admin@goget.com.au](mailto:admin@goget.com.au) Web: [goget.com.au](https://goget.com.au)

1. XX spaces are to be reserved for carshare operation with no charge to the carshare operator to use them
2. These spaces must be publicly accessible 24 hours a day seven days a week and should be well-lit with safe pedestrian access
3. These spaces must be contracted to an operator (a carshare provider that has been approved by the Responsible Authority) with evidence of agreement submitted to Council prior to issuing of the Building Permit
  - a. The agreement must ensure appropriate insurance and vehicle maintenance is in place including public liability.
4. The carshare operation, or contract confirming operation from an operator, must be in place before of issue of the Occupancy Permit
5. The carshare operator must report utilisation of the spaces to council quarterly (or in accordance with Council's on-street reporting requirements)

Optional Inclusions:

- Owners Corporations are to promote carshare to owners/tenants to ensure all future residents have awareness of the service
- In the interest of future-proofing the parking infrastructure it is recommended that sufficient cellular connectivity is available at the location of the carshare spaces (also an important aspect for safety reasons) as well as providing the requisite infrastructure (i.e. conduits, wiring, adequately sized power supply and metering cabinet) so that EV chargers can be readily provided when demand necessitates

This means that future residents can move into these new developments without having to bring their private vehicles with them as the carshare service will be up and running from the day that they move in.

We welcome cooperation and are always available for discussions.

Kind Regards,



**Christopher Vanneste**  
Head of Space  
GoGet Carshare



**Katya Eagles**  
Council Policy Liaison  
GoGet Carshare



**Darcy Lechte**  
Carshare Strategic Planner  
GoGet Carshare



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 1:44:26 PM  
**Attachments:** [en---bankstown-tod-rezoning-proposal.docx](#)

---

Submitted on Thu, 29/08/2024 - 13:43

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Bankstown 2200

**Please provide your view on the project**

I object to it

**Submission file**

[en---bankstown-tod-rezoning-proposal.docx](#) (14.85 KB)

### Submission

I am writing to express my strong opposition to the proposed Transport Oriented Development (TOD) rezoning of the Bankstown Town Centre. While the intention behind this proposal might be to enhance connectivity and urban density, the plan as it stands presents a series of critical issues that will have detrimental effects on our community.

**Increased Traffic Congestion:** The Bankstown Town Centre is already burdened with high traffic volumes and congestion. The proposed TOD rezoning will inevitably lead to further increases in traffic, overwhelming the existing road network. This congestion will not only exacerbate travel delays but also escalate safety concerns and contribute to environmental

degradation through higher emissions and pollution.

Here are the detailed effects:

**Deterioration of Quality of Life:** **Longer Commutes:** Heavier traffic congestion leads to longer travel times, causing frustration and stress for residents who rely on their daily commutes. Extended periods spent in traffic can also negatively impact work-life balance, reducing the time available for family, leisure, and other important activities. **Decreased Mobility:** Increased congestion can make it difficult for residents to move freely within and around the area. This decreased mobility can be particularly challenging for those with limited transportation options or mobility issues.

**Increased Environmental Impact:** **Air Pollution:** Higher traffic volumes result in increased emissions from vehicles, contributing to poor air quality. This can exacerbate respiratory problems, allergies, and other health issues for residents, particularly those with pre-existing conditions. **Noise Pollution:** Heavy traffic contributes to higher levels of noise pollution, which can lead to sleep disturbances, increased stress, and decreased overall well-being. Persistent noise can also affect the tranquility and livability of residential areas.

**Higher Risk of Accidents:** **Safety Concerns:** Congested roads increase the likelihood of traffic accidents. Higher traffic volumes can lead to more frequent collisions, posing greater risks to drivers, pedestrians, and cyclists. This can result in injuries, fatalities, and a general decrease in road safety. **Emergency Response Delays:** Traffic congestion can hinder emergency vehicles' ability to respond quickly to incidents, potentially delaying critical medical and emergency services and putting lives at risk.

**Strain on Infrastructure:** **Road Wear and Tear:** Increased traffic contributes to faster deterioration of road surfaces and infrastructure. This accelerates the need for repairs and maintenance, which can be costly and disruptive. Frequent repairs can also lead to further traffic disruptions. **Public Transport Pressure:** The additional demand on public transport systems can lead to overcrowding and reduced service reliability. This can undermine the effectiveness of public transportation as an alternative to private car use.

**Economic Impacts:** **Reduced Business Activity:** Increased traffic congestion can deter customers from visiting local businesses, leading to decreased revenue for shops, restaurants, and other enterprises. Lower foot traffic and accessibility issues can impact the viability of local businesses. **Higher Costs:** The economic burden of congestion extends to increased fuel consumption and vehicle maintenance costs for residents. The inefficiencies caused by congestion can also lead to higher costs for goods and services due to increased transportation expenses.

**Impact on Property Values:** **Decreased Desirability:** Areas plagued by heavy traffic congestion can become less attractive to potential home-buyers and investors. This can lead to stagnation or decline in property values, affecting homeowners' investments and overall market stability.

**Quality of Community Interaction:** **Reduced Social Engagement:** Persistent traffic congestion can discourage community interaction and participation in local events. Residents may be less inclined to engage in community activities or visit local amenities if traffic conditions are poor.

**Challenges for Active Transport:** **Cycling and Walking Difficulties:** Heavy traffic can create unsafe conditions for cyclists and pedestrians, discouraging active transport modes. This reduces the overall appeal and feasibility of walking or cycling, which can have



negative implications for health and sustainability goals.

**High Strain on Public Services: Infrastructure Pressure:** The current infrastructure is already stretched thin. Adding more density without corresponding upgrades to roads, public transport, water supply, and sewage systems will place immense pressure on these essential services. The risk is that residents will face deteriorating conditions in these critical areas. **Public Facilities:** Schools, healthcare centers, and recreational facilities are currently operating near capacity. The influx of additional residents could lead to overcrowding and a reduction in the quality of services and amenities available to current and new residents alike.

**Dilution of Property Values for Apartments:** Increased development density can lead to a saturation of the apartment market, resulting in a decrease in property values. The oversupply of apartments may undermine the investment potential for current property owners and lead to economic instability within the local real estate market.

**Community Character:** The proposed rezoning threatens to alter the unique character of the Bankstown Town Centre. Our community has a distinct identity that could be compromised by rapid, high-density development. Such changes may disrupt the existing social fabric, leading to a loss of the neighborhood's cultural and historical character.

**Economic Challenges: Business Strain:** Local businesses might struggle with increased congestion and reduced accessibility. This could impact their profitability and potentially lead to business closures, harming the local economy. **Cost of Development:** The financial burden of upgrading infrastructure to support new development could lead to increased public expenditure or higher taxes, straining community resources and impacting residents' quality of life.

**Inadequate Planning:** The current TOD rezoning proposal appears to lack comprehensive planning. Without detailed assessments and well-thought-out strategies to address the impacts of increased density, the development risks being poorly integrated into the existing urban environment, leading to sub-optimal outcomes.

**Insufficient Consultation:** The community consultation process for this proposal has been insufficient. Effective and meaningful engagement with residents is crucial for ensuring that development plans align with community needs and preferences. The lack of thorough consultation undermines public trust and does not reflect the democratic process that should guide such significant changes.

In conclusion, while the goals of the TOD rezoning may be well-intentioned, the current proposal is fraught with issues that could adversely affect the Bankstown Town Centre and its residents. I urge you to reconsider this proposal and engage in a more detailed, transparent planning process that addresses these concerns and incorporates genuine community feedback.

Thank you for your attention to this critical matter.

Kind Regards,  
Edward Nikolov.

**I agree to the above statement**

Yes

I am writing to express my strong opposition to the proposed Transport Oriented Development (TOD) rezoning of the Bankstown Town Centre. While the intention behind this proposal might be to enhance connectivity and urban density, the plan as it stands presents a series of critical issues that will have detrimental effects on our community.

**Increased Traffic Congestion:** The Bankstown Town Centre is already burdened with high traffic volumes and congestion. The proposed TOD rezoning will inevitably lead to further increases in traffic, overwhelming the existing road network. This congestion will not only exacerbate travel delays but also escalate safety concerns and contribute to environmental degradation through higher emissions and pollution.

**Here are the detailed effects:**

**Deterioration of Quality of Life:**

**Longer Commutes:** Heavier traffic congestion leads to longer travel times, causing frustration and stress for residents who rely on their daily commutes. Extended periods spent in traffic can also negatively impact work-life balance, reducing the time available for family, leisure, and other important activities.

**Decreased Mobility:** Increased congestion can make it difficult for residents to move freely within and around the area. This decreased mobility can be particularly challenging for those with limited transportation options or mobility issues.

**Increased Environmental Impact:**

**Air Pollution:** Higher traffic volumes result in increased emissions from vehicles, contributing to poor air quality. This can exacerbate respiratory problems, allergies, and other health issues for residents, particularly those with pre-existing conditions.

**Noise Pollution:** Heavy traffic contributes to higher levels of noise pollution, which can lead to sleep disturbances, increased stress, and decreased overall well-being. Persistent noise can also affect the tranquility and livability of residential areas.

**Higher Risk of Accidents:**

**Safety Concerns:** Congested roads increase the likelihood of traffic accidents. Higher traffic volumes can lead to more frequent collisions, posing greater risks to drivers, pedestrians, and cyclists. This can result in injuries, fatalities, and a general decrease in road safety.

**Emergency Response Delays:** Traffic congestion can hinder emergency vehicles' ability to respond quickly to incidents, potentially delaying critical medical and emergency services and putting lives at risk.

**Strain on Infrastructure:**

**Road Wear and Tear:** Increased traffic contributes to faster deterioration of road surfaces and infrastructure. This accelerates the need for repairs and maintenance, which can be costly and disruptive. Frequent repairs can also lead to further traffic disruptions.

**Public Transport Pressure:** The additional demand on public transport systems can lead to overcrowding and reduced service reliability. This can undermine the effectiveness of public transportation as an alternative to private car use.

**Economic Impacts:**

**Reduced Business Activity:** Increased traffic congestion can deter customers from visiting local businesses, leading to decreased revenue for shops, restaurants, and other enterprises. Lower foot traffic and accessibility issues can impact the viability of local businesses.

**Higher Costs:** The economic burden of congestion extends to increased fuel consumption and vehicle maintenance costs for residents. The inefficiencies caused by congestion can also lead to higher costs for goods and services due to increased transportation expenses.

**Impact on Property Values:**

**Decreased Desirability:** Areas plagued by heavy traffic congestion can become less attractive to potential homebuyers and investors. This can lead to stagnation or decline in property values, affecting homeowners' investments and overall market stability.

**Quality of Community Interaction:**

**Reduced Social Engagement:** Persistent traffic congestion can discourage community interaction and participation in local events. Residents may be less inclined to engage in community activities or visit local amenities if traffic conditions are poor.

**Challenges for Active Transport:**

**Cycling and Walking Difficulties:** Heavy traffic can create unsafe conditions for cyclists and pedestrians, discouraging active transport modes. This reduces the overall appeal and feasibility of walking or cycling, which can have negative implications for health and sustainability goals.

**High Strain on Public Services:**

**Infrastructure Pressure:** The current infrastructure is already stretched thin. Adding more density without corresponding upgrades to roads, public transport, water supply, and sewage systems will place immense pressure on these essential services. The risk is that residents will face deteriorating conditions in these critical areas.

**Public Facilities:** Schools, healthcare centres, and recreational facilities are currently operating near capacity. The influx of additional residents could lead to overcrowding and a reduction in the quality of services and amenities available to current and new residents alike.

**Dilution of Property Values for Apartments:** Increased development density can lead to a saturation of the apartment market, resulting in a decrease in property values. The oversupply of apartments may undermine the investment potential for current property owners and lead to economic instability within the local real estate market.

**Community Character:** The proposed rezoning threatens to alter the unique character of the Bankstown Town Centre. Our community has a distinct identity that could be compromised by rapid, high-density development. Such changes may disrupt the existing social fabric, leading to a loss of the neighbourhood's cultural and historical character.

### **Economic Challenges:**

**Business Strain:** Local businesses might struggle with increased congestion and reduced accessibility. This could impact their profitability and potentially lead to business closures, harming the local economy.

**Cost of Development:** The financial burden of upgrading infrastructure to support new development could lead to increased public expenditure or higher taxes, straining community resources and impacting residents' quality of life.

**Inadequate Planning:** The current TOD rezoning proposal appears to lack comprehensive planning. Without detailed assessments and well-thought-out strategies to address the impacts of increased density, the development risks being poorly integrated into the existing urban environment, leading to suboptimal outcomes.

**Insufficient Consultation:** The community consultation process for this proposal has been insufficient. Effective and meaningful engagement with residents is crucial for ensuring that development plans align with community needs and preferences. The lack of thorough consultation undermines public trust and does not reflect the democratic process that should guide such significant changes.

In conclusion, while the goals of the TOD rezoning may be well-intentioned, the current proposal is fraught with issues that could adversely affect the Bankstown Town Centre and its residents. I urge you to reconsider this proposal and engage in a more detailed, transparent planning process that addresses these concerns and incorporates genuine community feedback.



Thank you for your attention to this critical matter.

Kind Regards,

Edward Nikolov.

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 4:35:57 PM  
**Attachments:** [24-08---bankstown-rsl---tod-rezoning-submission---final.pdf](#)

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Submitted on Thu, 29/08/2024 - 16:33

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Parramatta 2150

**Please provide your view on the project**

I object to it

**Submission file**

[24-08---bankstown-rsl---tod-rezoning-submission---final.pdf](#) (647.33 KB)

**Submission**

Please see attached submission.

**I agree to the above statement**

Yes

29 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## **SUBMISSION: BANKSTOWN TOD REZONING PROPOSAL**

### **23-27A MARION STREET AND 32 KITCHENER PARADE, BANKSTOWN**

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of Bankstown RSL regarding the above-mentioned address which is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.



Figure 1: The subject land in its immediate context is highlighted above (Source: Six Maps)

Contextually, the subject land has the following relationships:

- North: Currently under construction; 14 Storey mixed-use development comprising 516 residential apartments, retail tenancies, health services facility, child-care centre.
- South: Marion Street with bus services to Bankstown and Fairfield.

- East: Commercial and retail between 1 and 3 storeys along Marion Street frontage. Cole Lane and Communications Museum Sydney is located towards the eastern rear of the subject land.
- West: Separated by Meredith Street resides a 7-8 storey government office building including Bankstown Police Station, Bankstown DCJ Housing and more.

As shown in Figure 2 below, the subject land is ideally located to provide additional housing within walking distance to the Bankstown Train Station. It is unconstrained with no heritage items or strata holdings that would make redevelopment more difficult. This submission supports the overarching theme and desire of the EIE which is to increase housing within highly accessible locations, such as the subject land.

However, our review of the Explanation of Intended Effects (EIE) has highlighted that there is a missed opportunity to deliver more housing over the subject land than currently envisioned, noting that other sites constrained by heritage values and lot sizes have taller buildings proposed. We specifically note for example that the site to the east (identified as Green) of the subject land has a heritage item directly to the north, which is a constraint to future development.

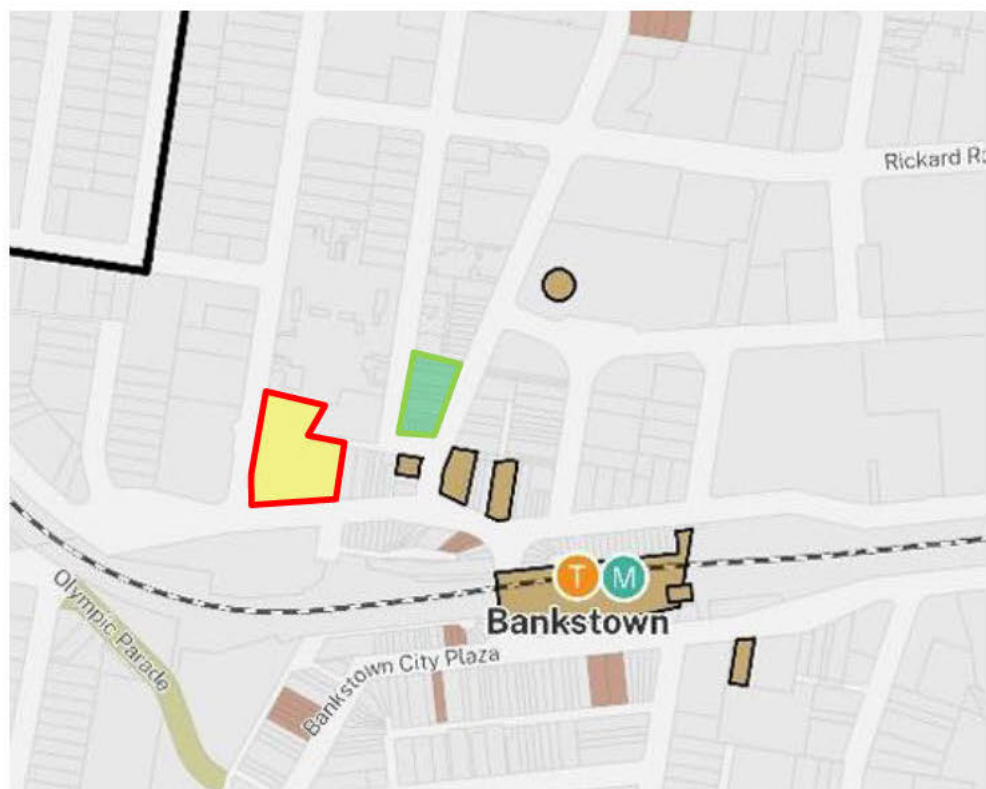


Figure 2: The site (identified Yellow) is ideally located within walking distance Bankstown Train Station and not directly impacted by an heritage item (Source: Department of Planning and Environment )



## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Bankstown Precinct. These objectives are set out in turn below, and high level commentary is provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
- <i>increase housing supply in well-located areas</i>	<p>The subject land is within walking distance of the Bankstown train station.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
- <i>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</i>	<p>The subject land can achieve compliance with this objective, being adjacent to the Bankstown Metro Station.</p> <p>The site is a significant area that can accommodate housing and commercial uses as per the MU1 Mixed Use Zoning over the subject land.</p>	✓
- <i>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</i>	The subject land offers the opportunity to support more housing within close proximity to Bankstown Station, services and entertainment offerings within the Town Centre.	✓
- <i>increase the amount of affordable housing in these locations</i>	The subject land can contribute to the affordable housing supply.	✓

## REZONING PROPOSAL OBJECTIVES

The Department published EIE clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Bankstown TOD Precinct EIE. These are discussed below.

Objective	Response	Consistent
– <i>increase housing supply in the Bankstown City Centre;</i>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
– <i>enable a variety of land uses (residential, commercial, recreational) within walking distance of the Bankstown railway station and future metro station;</i>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
– <i>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</i>	The subject land with amendments made to the strategy, contributes to a streamlined planning approach that delivers more housing faster.	✓
– <i>increase the amount of affordable housing across Bankstown City Centre; and</i>	The subject land can contribute to the affordable housing supply.	✓
– <i>consider the vision and objectives of the Canterbury-Bankstown Council (Council) adopted Bankstown City Centre Master Plan.</i>	The subject land can deliver the recommendations of the Bankstown City Centre Master Plan along with delivering additional residential growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal and is identified in the Urban Design Study as a key site, the actual housing capacity of the site should be realised, rather than being constrained as it currently is.

## NOTABLE SITE CHARACTERISTICS

The land, the subject of this submission has several unique characteristics that warrant additional detailed consideration and provides an excellent opportunity to contribute to employment and housing supply in the Bankstown Precinct. Notable characteristics comprise:

1. The subject land is within walking distance to the Bankstown Train/Metro Station, with dimensions and area that can comfortably accommodate a taller building.
2. The land is a prominent corner lot, owned by a single ownership, meaning that development can occur now and be a catalyst for further development in the precinct.



3. The land at its nearest point is about 240m from the Bankstown Train/Metro Station entrance, making its accessibility excellent.
4. The land is ideal for innovative planning controls that deliver on the aspirations of both employment and housing, ideally located proximate to the train station, and with unique characteristics for both workers and residents.
5. The land is in a precinct where the emerging character is of tall slender towers that contain mixed-use activities within. Accordingly, the proposal accords with the character of built form in TOD precincts and should have a higher height given its proximity to the train station.
6. Importantly for this submission, the land enjoys incredible opportunity for workers and residents to benefit from views and also benefit from its location near the town centre and open spaces.

## UNCONSTRAINED LAND

The subject land is currently occupied by Bankstown RSL Club, with the site having regular proportions and dimensions, and an area of approximately 5,181.2 m<sup>2</sup>. Investigations by SJB Architects have confirmed that the subject site is free of flood risk, strata sites and road widening. Likewise, the urban design report noted that the subject land is held within a single ownership and offers exceptional opportunities to create high amenity development.

In recognition of the unconstrained nature of the subject land and its opportunities for exceptional development, SGS accordingly have identified it as a key site and capable of delivering a building of up to 20 storeys. This is shown in the height map extract below.

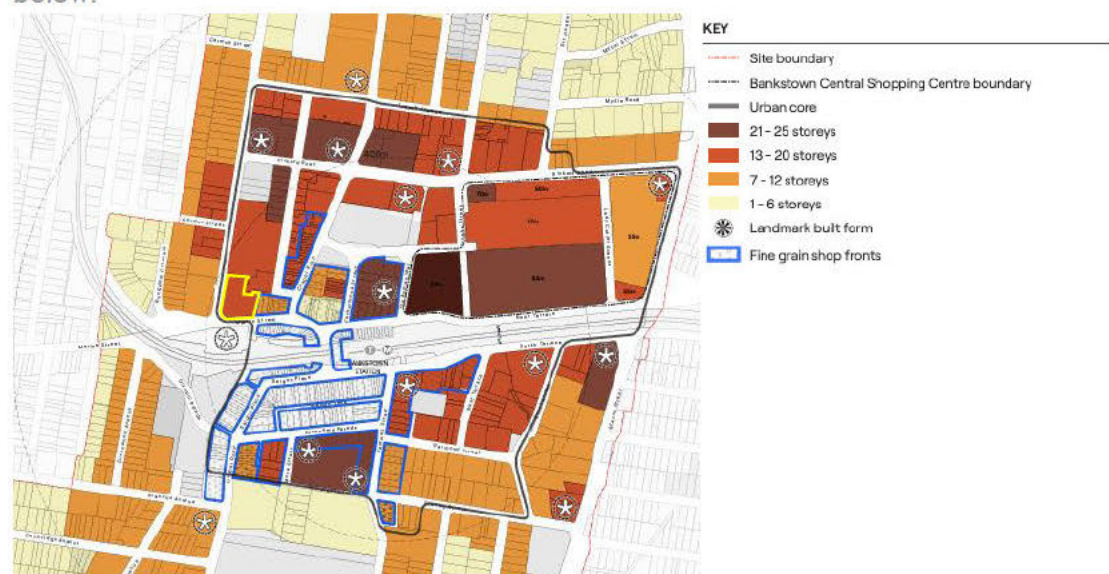


Figure 3 Built Form & Height Recommendations, with the subject land outlined in yellow (Source: SJB)

As can be clearly seen on the above map, the subject land is identified as capable of having the same height (13-20 Storey) as the site located towards the east. Our client does not seek to go beyond the proposed planning controls to the site located to the east, however, proposes a consistent control in recognition of the:

- Gateway location of the subject site within the Bankstown TOD Precinct
- Its single ownership and size that makes redevelopment possible now
- Its corner location which provides exceptional frontages and opportunity to deliver amenity for future residents.
- Proximity to the train station.
- Location within the Bankstown Centre.

Given the above, it is unclear why the recommendations height and FSR changes within the EIR propose a lower standard than more constrained land within the town centre. We note that a transition to lower density outside the centre could be the desire, however a 4m height difference is not noticeable and in terms of transition, will have absolutely no visual transition, or amenity benefit. In other words, the subject land should have a height of 58m and FSR of 5.5:1 with the transition in height occurring west of Meredith Street and outside of the urban core.



Figure 4 The height map and FSR map, with the subject land outlined in yellow. The site to the east is closer to an heritage item has a higher Height and FSR (Source: EIE, Urban Design Report)

This submission therefore recommends that the:

- height be increased to 58m, and
- FSR be updated to 5.5:1 applied.

Importantly, these changes reflect and are consistent with controls already proposed within the town centre, and on a site which can be readily developed to deliver



additional housing to the market in a short time, rather than unknown period due to land and other constraints which are burden other sites within the Bankstown TOD precinct.

## LOCATED WITHIN THE URBAN CORE AND CONSISTENT WITH KEY BIG MOVES

The subject land is identified as being located within the urban core as per the figure below. Increasing the height over the subject land importantly retains consistency with relevant Big Moves proposed including:

1. Transit Orientated Development which focuses on intensification and significant change in the urban core
2. Connect North and South, with the subject land close to the main Saigon Place spine, providing homes and jobs within a key location
3. Connect and Expand Open Spaces, with the subject land within 400m of existing and proposed (in the UDS) open space.
4. Reinforce the Urban Core, which includes the subject land
5. Concentrate Jobs around Public Transport, with the site within the intensification area for future job growth.

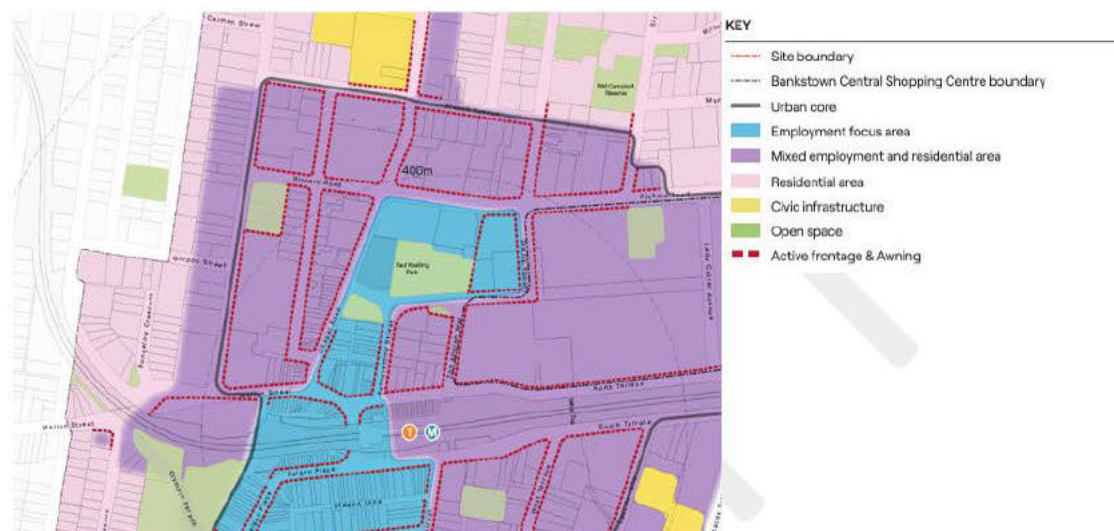


Figure 5 Urban Core Boundary (Source: EIE, Urban Design Report)

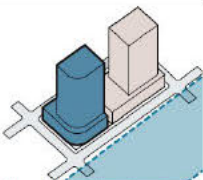
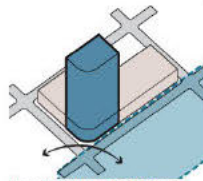
The urban core seeks to concentrate and contain development within the urban core to achieve housing targets and job targets of the TOD. Specifically, SJB emphasised in their urban design analysis that areas within 400m of transport infrastructure (rail) would benefit from significant changes, with it reducing from the inner neighbourhood and within 800m of the future metros station. The subject site clearly is located within

the urban core and therefore is aligned with the urban design principles prepared by SJB that increased housing and job density within this area.

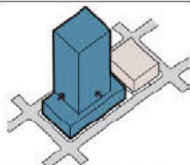
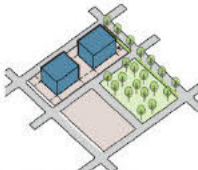
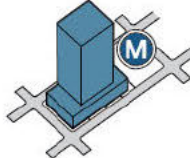
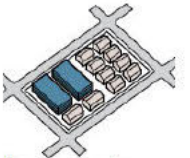
In this regard, our client recommends that the proposed 1.4:1 non-residential floor area requirement, should be amended given its existing non-residential floor space being approximately 1:1. Therefore the existing Bankstown RSL club has a generous non residential floorspace that makes a valuable contribution to Bankstown Local Centre. Notwithstanding this as stated further in the urban design principles, future developments are to promote a thriving urban core which is active throughout the day, evening and night. To provide activation in all hours of the day it is essential for further residential floor spaces to support the urban core over the subject site. Therefore, an increase in height and FSR is essential and is the right place due to its proximity to the Train/Metro Station, no urban design constraints and within a prominent corner allotment which has been identified as an opportunity site by SJB.

## SUBJECT LAND MEETS KEY URBAN DESIGN STRATEGIES

We commend the DPHI for preparing an urban design analysis with a firm foundation on good urban design principles and strategies. Whilst the site is in the urban core, we object to the reduced height and FSR over the site, which is clearly capable of more capacity, based on the analysis contained within the UDS. A 58 m building and 5.5:1 FSR over the subject site clearly achieves compliance with the following relevant urban design strategies:

Strategy		Comment	Consistency
Transit Orientated Development	 <p>Align tall buildings along streets which define the Urban Core.</p>	The subject land is a corner site and is ideally suited for a tall building of 58m. It is a prominent site on the western edge of the Core and appropriately defines an entry into this area.	✓
Connect North and South	 <p>Locate gateway buildings on prominent corners of the Urban Core.</p>	The site is a Gateway location and visually prominent for visitors entering the Bankstown urban core, along with acting as a marker of the western extent to the town core by providing an important vista element along the street and rail corridor.	✓



	 <p>Gateway and/or landmark buildings on street intersections of the north south spine</p>	<p>Whilst not on the north south spine, the principle of gateway buildings applies to the subject site. A higher height is therefore required that reflects its location in the urban core, with 4 m difference indistinguishable.</p>	✓
<b>Reinforce the urban core</b>	 <p>Locate density within proximity of the Metro Station and areas of amenity.</p>	<p>The subject land is suitable for higher density given its close proximity to the metro station and areas of high amenity within the TOD precinct.</p>	✓
<b>Concentrate jobs around public transport</b>	 <p>Focus commercial around the Metro Station and centre of Bankstown.</p>	<p>The subject land is within the urban core and ideal for commercial floorspace, balanced with residential.</p>	✓
<b>Combined intensification</b>	 <p>Align new community infrastructure to intensification of residents, students and workers.</p>	<p>The subject land supports the provision of essential community infrastructure in the town centre by providing a site capable of being developed now due to its size and ownership arrangements, which can facilitate and enhance use of community infrastructure in Bankstown.</p>	✓

## A KEY SITE MUST HAVE HIGHER FSR AND HEIGHT

As noted within the urban design report prepared by SJB, the subject land is a key site and important gateway location within the urban core. Several principles outlined above show that a foundation of the planning framework is using taller built form to highlight and define areas within the urban core. The subject land is located on a prominent corner bounded by Marion Street and Meredith Street which is a gateway location on the south western edge of the urban core. It is accordingly suitable for higher height and FSR to deliver more housing within this strategically important and visible location within urban core.

The proposed controls over the subject site are contrary to the design principles and strategy of the urban design report in that it limits the potential of the subject land to deliver a landmark building in the urban core. As a result and noting the difficulty in

achieving TOD outcomes on other sites due to land amalgamation, site isolation and other constraints in the urban core, the TOD objectives without the subject land developed to its appropriate capacity, are at risk of not being realised. Therefore, we recommend that it is essential as a matter of priority to increase the height to 58m and FSR to 5.5:1 over the subject land, to ensure that the vision of the Bankstown TOD Precinct is realised in terms of housing supply and jobs.



Figure 6 Amalgamation Pattern proposed by SJB. As can be seen, the subject site is not constrained by numerous, as opposed to other sites in the TOD precinct with taller heights. Taller heights can be delivered on our clients land without the need to purchase any additional land or deal with site isolation issues. (Source: Urban Design Report)

It is therefore of fundamental importance that planning controls are designed in a manner that facilitates nuanced schemes, with the current 54 m and 4:1 FSR preventing this. Our client seeks a framework that is flexible and includes controls including height and FSR that enable a considered response to context and where design excellence is delivered. A higher height and FSR over the subject land will facilitate this outcome.

## PROOF OF CONCEPT TESTING – REFERENCE SCHEMES

The urban design report includes testing of the concept, which we support. However, there is no obvious reason why one site has a 58m limit, and our client's site has a 54m limit (Figure 4). As the extract below shows, there is no significant difference in a visual sense.





Figure 7 Envelopes proposed by SJB showing no significant difference in a visual sense between 54 and 58 m. We particularly note the difficulty in amalgamating a site to develop a 58m tower in the spine as proposed in the EIE height map. The indicative location of the subject land is outlined in black. (Source: Urban Design Report)

We particularly note that the development of the subject site at 58 m will be fully compliant with the ADG in terms of solar access, and other key standards that relate to amenity of future residents within and beyond the site boundary. The additional height proposed from 54m to 58m (1 storey) will not cause any adverse material impacts on the neighbouring properties such as overshadowing due to favourable lot orientation of the subject land.

Additionally, any new redevelopment of the subject land will logically integrate new development above the existing club building envelope. Without this modest increase in FSR and Building Height any future development will be limited and cannot optimise the full extent of the control to deliver residential floor space. Accordingly, we would recommend that the best place for resolving height within the envelope is the DA stage, rather than overly prescriptive mapping that focuses on one rigid outcome only.

Increasing the height over the subject site would also be consistent with the TOD and EIE objectives to have more housing in highly accessible locations, whilst also delivering more affordable housing. This is particularly pertinent when +30% infill affordable housing pathway within the Housing SEPP 2021 is switched off.

## RECOMMENDATIONS

The subject land presents a unique opportunity to increase the housing supply within a highly accessible location within walking distance to Bankstown Train Station. Accordingly, it is recommended that –

- The height be increased over the subject land from 54m to 58m.
- The FSR be increased over the subject site land 4:1 to 5.5:1



## Conclusion

Thank you for the opportunity to make this submission on the accelerated Bankstown TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Bankstown TOD, we strongly recommend the adoption of the recommendations within this submission to further improve housing affordability and liveability within Bankstown.

Should you require any further information or require a meeting to discuss this further, I can be contacted on [REDACTED] or [REDACTED]

[REDACTED]  
Urban Planner  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 5:09:32 PM

---

Submitted on Thu, 29/08/2024 - 17:09

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Bilge

### **Last name**

Osman

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I object to it

### **Submission**

Attention DPHI Assessment Officer,

The current Bankstown TOD masterplan does not adequately address the need for increased density in these crucial areas, which is essential for maximising the benefits of these investments and supporting community growth.

Higher density in well-serviced areas helps to meet the growing demand for housing and address affordability issues. By increasing the number of residential units near the metro station and hospital, the supply of housing can better match the needs of a larger population. This increased supply helps to stabilise property prices and improve affordability. Without sufficient density, housing shortages and affordability challenges may worsen, making it harder for residents to find suitable and affordable accommodation.

Increased density around key infrastructure such as the metro station and shopping centres helps to mitigate traffic congestion by promoting alternative transportation options. With more residents living nearby, there is a greater likelihood of reduced car use and improved traffic flow. This shift is crucial for addressing congestion and enhancing overall mobility. Inadequate density may perpetuate traffic issues, undermining the benefits of the new infrastructure and contributing to a more congested urban environment.

Higher density supports the development of mixed-use projects that integrate residential, commercial, and recreational spaces. These developments create dynamic, multifunctional areas where residents can live, work, and play within close proximity. Mixed-use developments enhance convenience and support a more cohesive urban environment. Insufficient density limits the potential for such developments, leading to a more fragmented and less functional urban landscape.

Higher density near shopping centres fosters a vibrant economic environment by increasing foot traffic and consumer spending. With more residents nearby, retail businesses and service providers benefit from higher patronage, which supports their viability and attracts new businesses. This economic boost is crucial for maintaining diverse and competitive shopping options. Lower density, on the other hand, can result in decreased business activity and fewer retail options, which diminishes the economic health of the area.

The significant financial investments in the new hospital and metro station are intended to enhance local services and infrastructure. For these investments to yield their intended benefits, it is vital that the surrounding areas support higher density. This ensures that the facilities are utilised to their maximum potential, which justifies the initial expenditure and supports ongoing operational costs. Without increased density, these facilities risk operating below their designed capacity, potentially leading to inefficiencies and underperformance.

I strongly urge DPHI to reconsider the density provisions and make necessary adjustments to better support the community's needs and the benefits of increased density.

Regards,  
Bilge

**I agree to the above statement**  
Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 5:13:51 PM

---

Submitted on Thu, 29/08/2024 - 17:13

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Yildirim

### **Last name**

Erbakan

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I object to it

### **Submission**

I hope this message finds you well.

I am writing to formally express my objection to the proposed rezoning masterplan for Bankstown. After careful consideration of the plan's details, I believe that several critical issues need to be addressed before moving forward with this proposal.

Higher density supports the development of integrated mixed-use projects that combine residential, commercial, and recreational spaces. These developments create multifunctional environments where residents can live, work, and play without needing to travel long distances. This integration enhances convenience and supports a more cohesive urban landscape. Without sufficient density, the potential for such developments is reduced, leading to a more fragmented and less convenient urban experience.

Dense urban environments foster greater social interaction and community cohesion. When residents live in closer proximity, there are more opportunities for engagement in social and community activities. This interaction helps build a sense of belonging and strengthens community ties. Lower density areas may result in less vibrant communities with fewer opportunities for socialisation, impacting the social dynamics and inclusivity of the neighbourhood.

Increased density is aligned with principles of sustainable urban development, which seek to use land and resources more efficiently. By focusing development around existing infrastructure such as the metro station and hospital, we can prevent urban sprawl and make better use of available land. This approach helps preserve green spaces and reduces the need for extensive new infrastructure, contributing to a more sustainable urban environment. Lower density may lead to inefficient land use and increased environmental impacts due to urban expansion.

Higher density around shopping centres is vital for stimulating local economic activity. With more residents in the vicinity, shopping centres will experience increased foot traffic, leading to higher sales for businesses and greater economic vibrancy. This enhanced economic activity supports both existing businesses and attracts new enterprises, contributing to the area's overall economic health. Conversely, lower density could result in reduced commercial viability and fewer retail and service options for the community, stifling economic growth.

Thank you for considering my objections. I am hopeful that the Department will take these concerns seriously and make the necessary adjustments to the masterplan.

Sincerely,  
Yildirim Erbakan

**I agree to the above statement**  
Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 5:29:34 PM  
**Attachments:** [letter-of-submission---bankstown-tod-rezoning.pdf](#)

---

Submitted on Thu, 29/08/2024 - 17:27

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am submitting on behalf of my organisation

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Revesby

**Please provide your view on the project**

I am just providing comments

**Submission file**

[letter-of-submission---bankstown-tod-rezoning.pdf](#) (960.9 KB)

**Submission**

Please find attached a submission with comments to the TOD rezoning on behalf of a number of property owners

**I agree to the above statement**

Yes

# SUBMISSION TO BANKSTOWN TOD REZONING PROPOSAL 1 WEST TERRACE, 258-260 SOUTH TERRACE BANKSTOWN

August 2024

**Prepared by:**

George Nehme – Director  
0450 606 056  
george@pplanning.com.au

**Project Number:** 139-2024

**Revision:** B



Department of Planning Housing and Infrastructure

Date: 29 August 2024

**Letter of Submission to the Bankstown TOD Rezoning Proposal and Proposed Pathway Changes to Support TOD**

This letter has been prepared to provide a formal submission to the exhibition of the Bankstown TOD rezoning proposal on behalf of the owners of 3 sites within the rezoning area being, 258 South Terrace, Lot 1 DP 735613, 260 South Terrace Bankstown, Lot 3 DP 525239 & 1 West Terrace Bankstown Lot 1 DP 524669. The 3 allotments are located on the southern end of the Bankstown TOD Precincts Boundary Map, as indicated in the figure below;

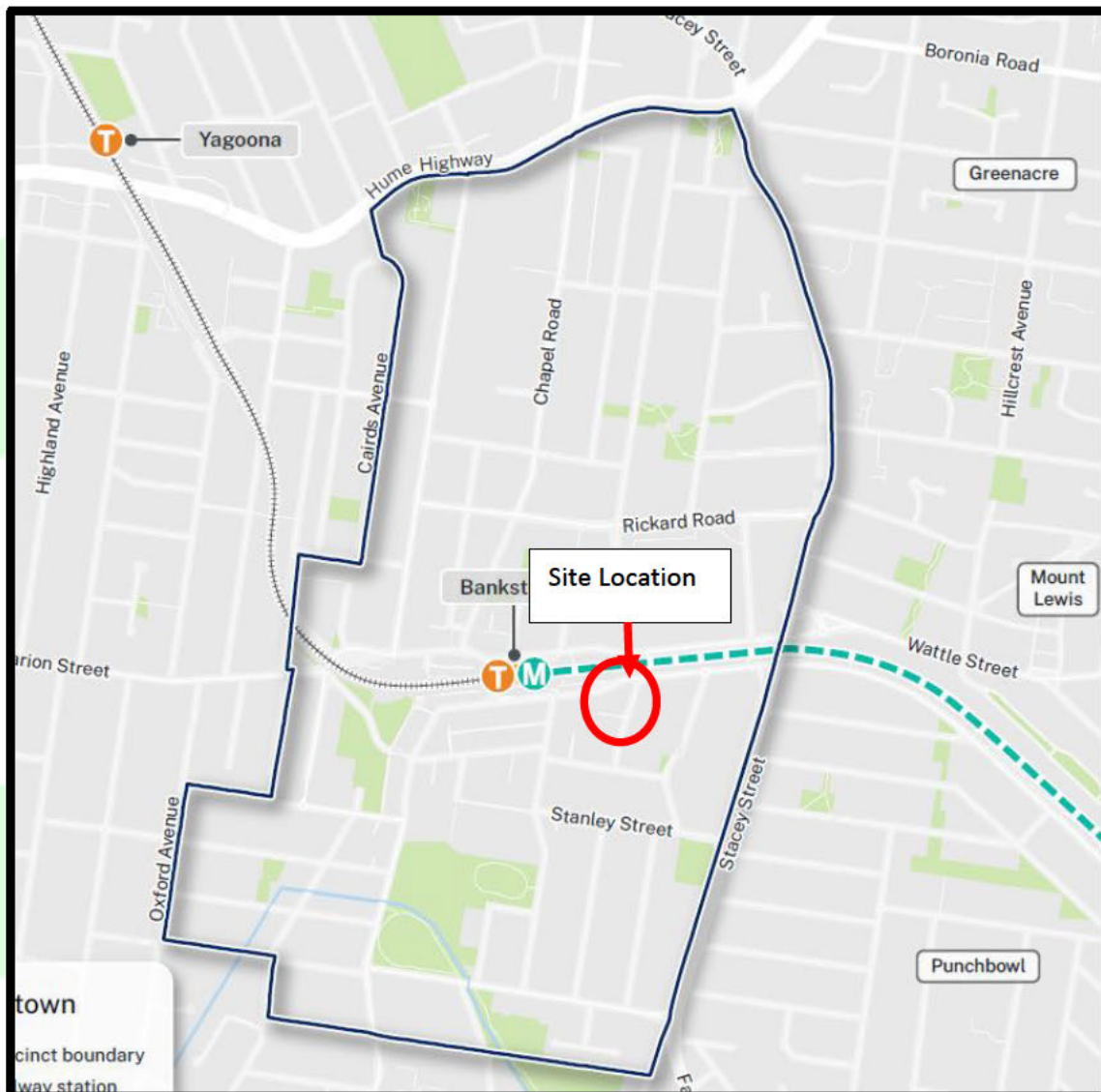


Figure 1: Location of the site within boundary map.

A brief overview of the site has identified the following;

- a) Site Area = 258 South Terrace (1,200m<sup>2</sup> approx.), 260 South Terrace Bankstown (800m<sup>2</sup> approx.), 1 West Terrace (590m<sup>2</sup>). Combined Site Area equates to approximately 2,590m<sup>2</sup>.
- b) Frontage, South Terrace approximately 48m.
- c) Frontage to Wets Terrace approximately 70m.

The combined sites are located at the intersection of South terrace to the north and West Terrace to the east. The subject sites are currently zoned B4-Mixed Use pursuant to the Canterbury Bankstown Local Environmental Plan (CBLEP) 2023.

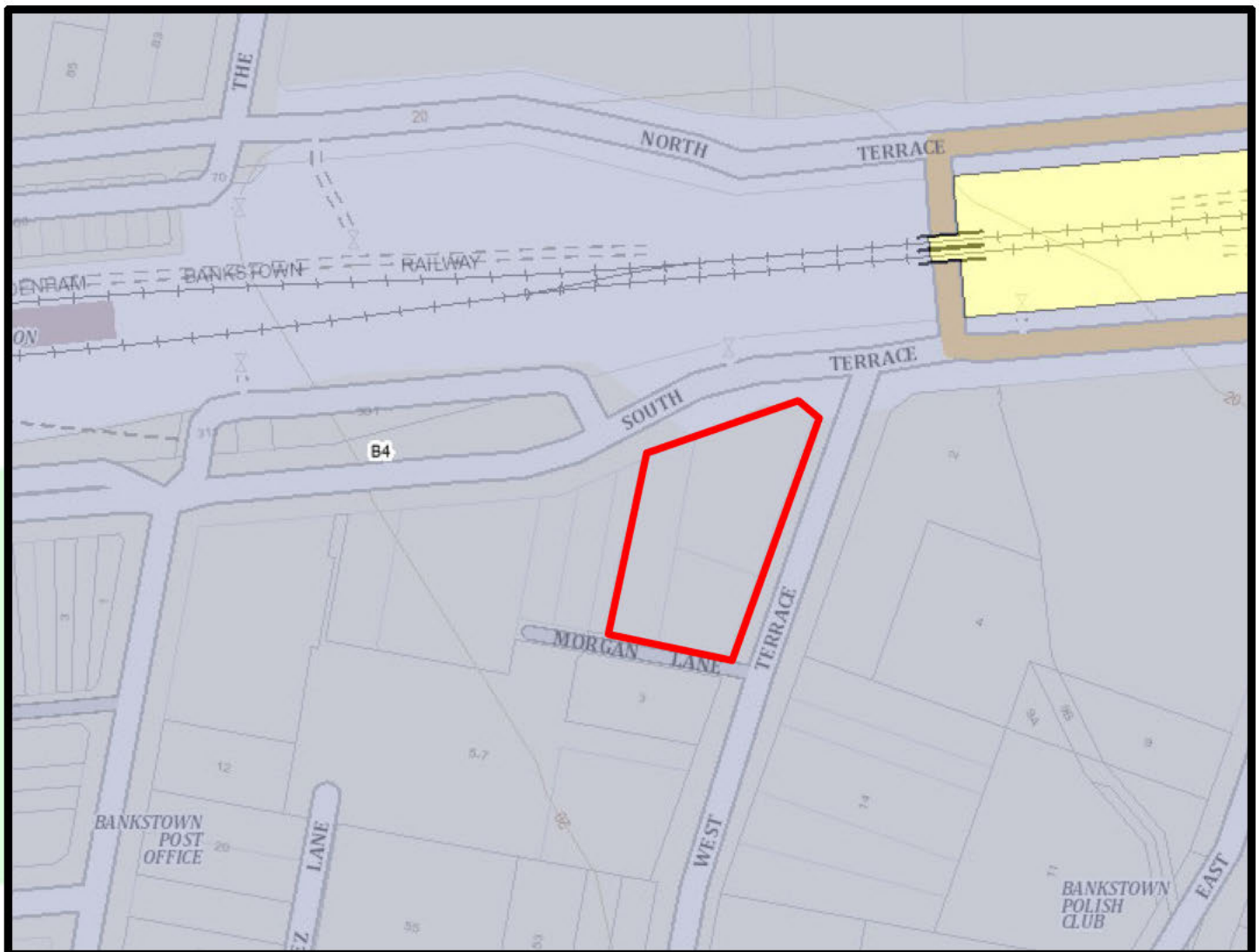
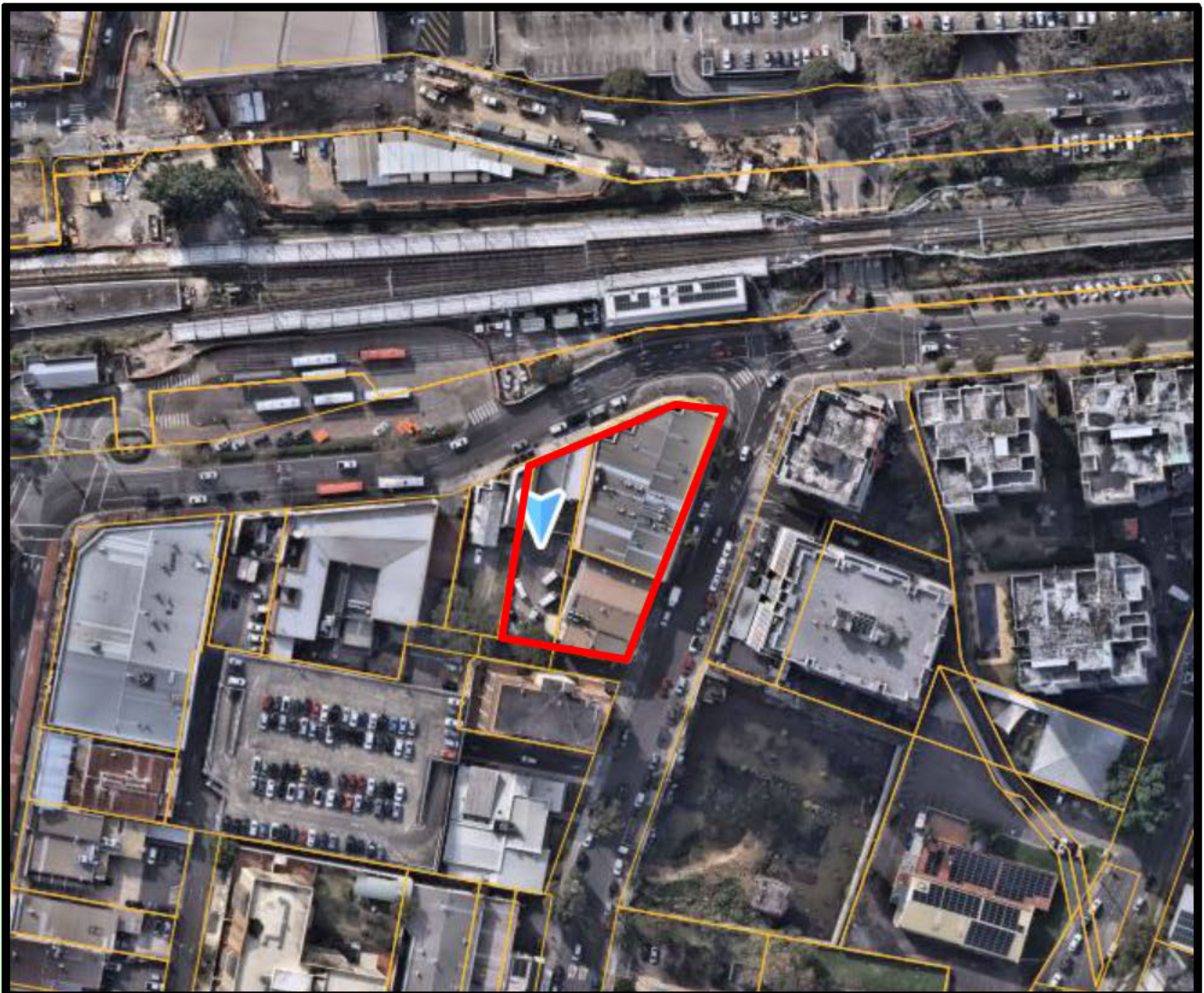


Figure 2: Zoning Map





**Figure 3: Aerial Photo**

The sites are considered a key corner location south of the existing railway station and the future metro station. Under the provisions of the exhibited planning proposal the subject sites have had the following envisaged development standards applied.

- 1) Height – 58m (13-20 Storeys)
- 2) FSR – 5.5:1
- 3) Zone – MU1 Mixed Use

### **Additional Height and FSR**

Whilst the proposal presents an increase in the density afforded to the site with regards to height and FSR, it is considered as the subject sites are identified as a key site within the TOD precinct, the fact the sites present a prominent corner site in close proximity to the future major metro line, the full potential of the site is not considered to be achieved.

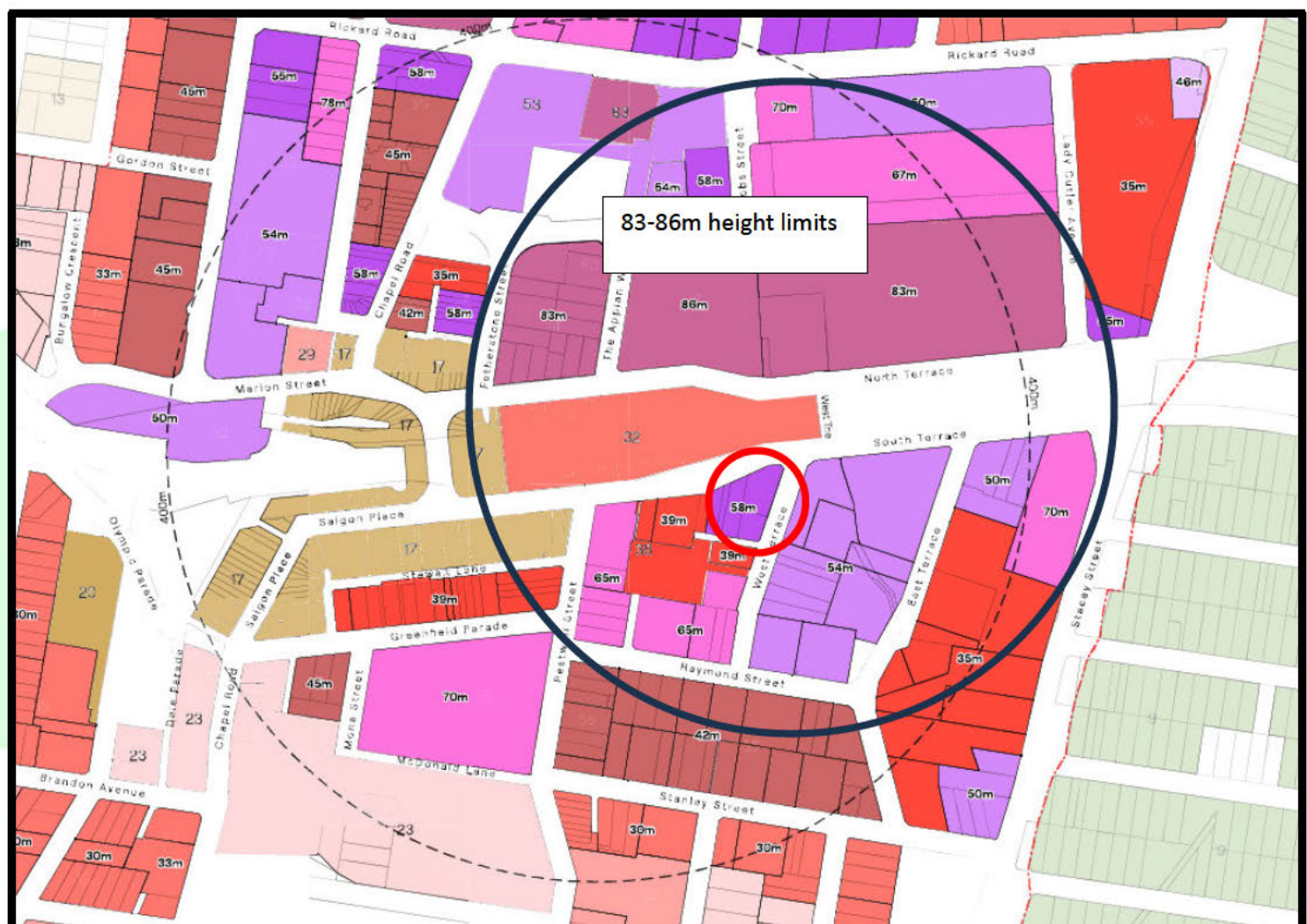
A key principle of urban design is to take advantage of corner sites and create gateway sites in key corner locations. Having a proposed height limit of 58m and an FSR of 5.5:1 is not considered appropriate given the prominent corner location. It is considered to be able to give prominence and create a gateway location in this location an additional uplift of FSR and height is appropriate. It is considered key sites within a CBD precinct such as this site should be considered for a height limit of between **85m-90m** and an FSR of up to **8:1**.



It is considered the uplift of this site in a key location will align with other key corner sites located north of the precinct along the north of the rail line as indicated in the figures below. It is considered providing higher densities in the vicinity of the station both to the north and south for key sites, enables the proper establishment of a centralised density core around the key transport node. Limiting the increase height and FSR to north of the railway line is not considered an approach that would achieve the intended increase in housing and is not taking advantage of key sites that have the capacity to cater for additional yield such as this site. It is considered a central core of higher density around the station in the radius indicated by the black circle below would be appropriate.

Inclusive of the subject sites the additional yield at a central core around the station would not only lend to the provision of additional housing around the key transport corridor, but also encourage additional affordable and social housing to serve key medical and educational developments in the area namely the new Bankstown Hospital and the Western Sydney University.

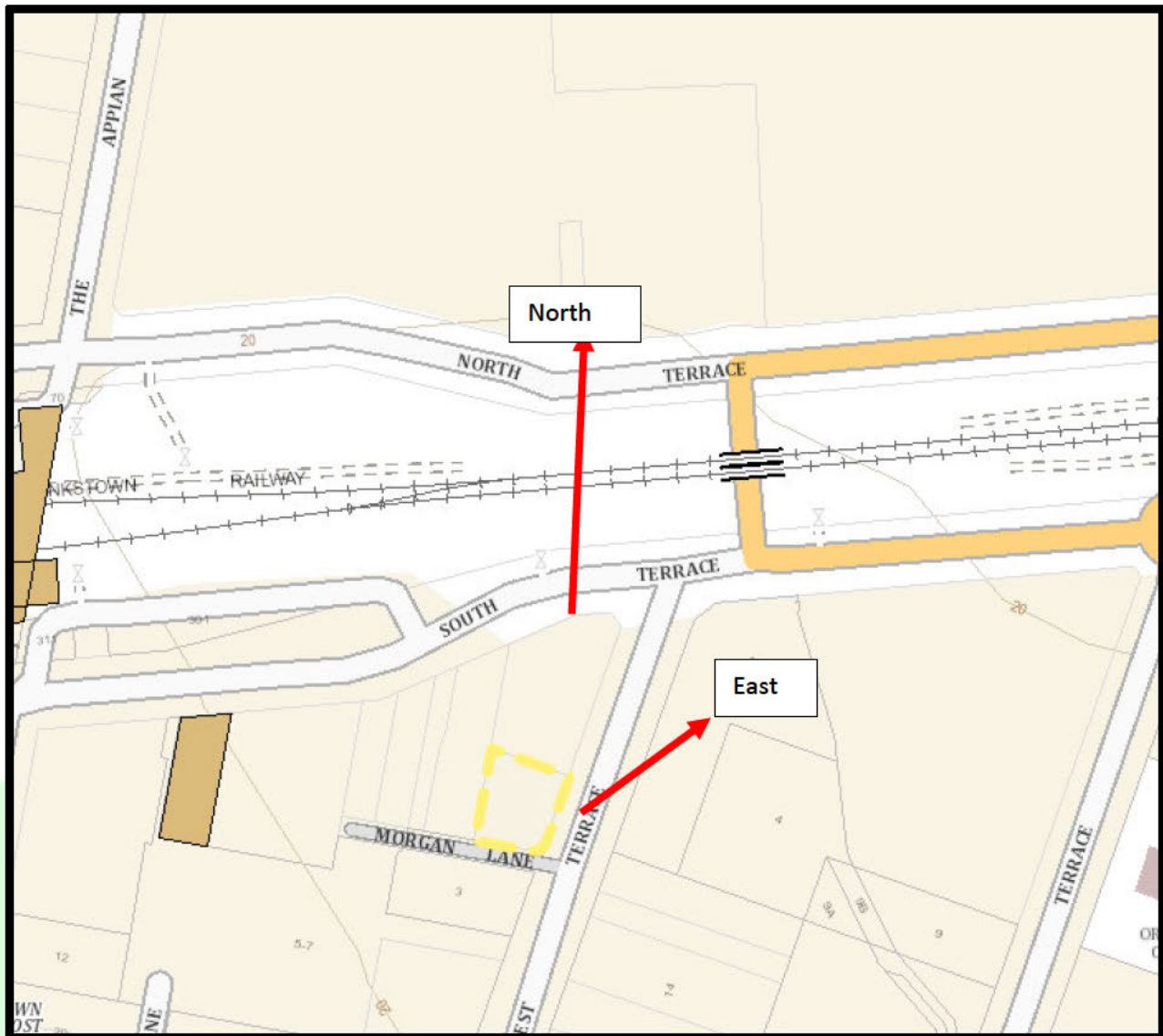
Providing a central core around Rickard Road to the North, Stacey Street to the east, Raymond terrace to the south and Restwell Street to the west would be optimal.



**Figure 4: TOD Height Map**

A key element to this site that lends itself to a higher density is the orientation having key aspects to the north and east. The aspect to the north and east is relatively unobstructed due to the location of the railway line to the north. A relatively unobstructed northern aspect lends itself to future residents having superior amenity, as they take advantage of access to the sun from the east and north.





**Figure 5: Cadastre indicating aspects of the development**

Having a higher density with northerly and easterly aspects enables less reliance on mechanical ventilation and promotes sustainability.

It is considered the provision of additional density within this location is not only benefit from an urban design perspective but also provides additional density to meet the housing demand that is currently lacking within the state in a key location adjacent to important transport nodes. The additional density, may also lead to increased housing affordability as the supply around the precinct and the LGA will increase based on the principles of the TOD.

Creating more accessible housing within close proximity to key transport nodes, is a fundamental planning and TOD principle, and the site in question above is considered a key site that has the characteristics to contribute to the provision of easily accessible and potentially more affordable housing.

#### **Limitations of mandated non-residential FSR**

Whilst the benefits from an urban design aspect is evident the strong corner presence of the site also enables the opportunity for highly visible and active street frontages that could take advantage of multiple street frontages and encourage ground floor and/or podium commercial/retail offerings for tenants in a key location.

Whilst active street and non-residential uses at the ground floor are key elements, and should be encouraged, it is considered mandating minimum non-residential FSR for key sites is not warranted, as it is often the case around the Bankstown City Centre that commercial tenancies that are mandated by the EPI's are often left vacant and unable to be leased. It is considered that tying developers into minimum non-residential FSR would inhibit achieving a proper development yield on the site or make a project feasible for construction.

The amount of non-residential FSR, should be driven by the market as it is important to avoid 'white elephants' in key locations where there is a multitude of untenanted non-residential uses, creating adverse urban design impacts, and developments where vacant and unactive street frontages bring with it potential increase in crime or unruly behaviour.

It is important that developers are afforded the options when developing a site and not be tied in to minimum non-residential FSR. Alternatively, developers can be provided a target to work towards and the provision of more non-residential FSR achieved can be directly tied into additional yield in terms of FSR and height afforded to a site. Moreover, if a mandated non-residential FSR is introduced, developers should be afforded the opportunity to seek an amendment if it can be adequately demonstrated that the non-residential FSR cannot be leased after a certain period of time.

### **Temporary SSD Pathway**

It is considered the provision of a temporary State Significant Development (SSD) accelerated program for developments with the TOD precincts over \$60 million is positive. It is often found many Council DA departments are inundated and have unrealistic time frames to achieve, particular with more complex applications. It is often also found that Councils whilst within their right concentrate on finite issues which often stifle large scale developments from coming to fruition in a timely manner. It is considered enabling a different approval pathway in which a significant development can be delivered in a timely manner is appropriate and beneficial for achieving the intended aims and objectives of the TOD precincts.

### **Exemptions from low-risk referrals**

It is also considered the intention to have developments within the TOD precinct exempt from certain low-risk referral requirements as a positive. It is often the case large scale applications with local and regional significance are delayed by the lack of response or diligence from referral agencies required to comment on a DA. It is considered enabling referrals of low-risk to be by-passed will be a key element in achieving the required DA determination times and subsequent housing targets.

### **Alternate Design Excellence Pathway**

Moreover, the provision of an alternative design excellence pathway is encouraged. The provision of a separate process to the local EPI in the TOD precincts will provide the ability for regional and state significant developments to be considered from a standardized process driven by the Government Architects Office. It is key in this instance that the design excellence process is streamlined and efficient and provides clear and key recommendations to developers in the first instance to avoid developments being required to be presented on multiple occasions to a panel. It is also encouraged to provide a pathway for developers and architects to present concept designs to a panel at a Pre-DA stage to enable concerns and recommendations to be implemented prior to the DA being submitted.

### **Conclusion**

Upon review of the TOD rezoning proposal, it is considered the proposal includes many positive elements that is intended to speed up the determination process including the temporary SSD pathway, exemptions from low-risk referrals and an alternate design excellence pathway. Moreover, whilst the proposed density increases are welcomed in particular with the sites subject of this letter, it is considered the proposal has not considered the overall potential of the sites within the vicinity of the proposed metro and railway full potential. It is considered the subject sites form an identified key site within the Bankstown TOD precinct and are benefited from a corner site

location with a predominant north and east orientation. It is considered the exhibited FSR of 5.5:1 and height of 58m will not result in an appropriate development yield.

The sites given the close proximity to the station and obvious site benefits would be better suited to a height limit of between 85-90m and an FSR in the vicinity of 8:1. It is also considered appropriate to provide alternatives to developers with regards to mandated minimum non-residential FSR as its often not-feasible to lease out the floor area mandated by the EPI. It is considered appropriate to provide alternatives when a developer can demonstrate the mandated non-residential FSR is unable to be leased or sold. Alternatively, if a particular target of non-residential FSR is achieved, the developers should be incentivised with additional density including height and FSR.

**Kind Regards**



**George Nehme**  
**Director**  
**Pivotal Planning Pty Ltd**

*This letter is dated as above in 2023 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of the authors' opinion in this letter. The individual whom prepared this letter on the instructions, and for the benefit only, of the applicant for the purpose of planning advice any other purpose or use. To the extent permitted by applicable law, the authors expressly disclaim all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose). In preparing this letter, the individuals were required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment. All surveys, forecasts, projections and recommendations contained in or associated with this letter are made in good faith and on the basis of information supplied to the author at the date of this report, and upon which the author relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which the author has no control. In preparing this letter, the author may rely on or refer to documents in a language other than English, which the author may arrange to be translated. The author is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this letter being inaccurate or incomplete arising from such translations. Whilst the author has made all reasonable inquiries it believes necessary in preparing this letter, it is not responsible for determining the completeness or accuracy of information provided to it. The author (including its members and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which the author relies, provided that such errors or omissions are not made by the author recklessly or in bad faith. This letter has been prepared with due care and diligence by the author and the statements and opinions given by the author in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above. This letter has been prepared by Pivotal Planning Pty. To the best of our knowledge, the information contained herein is neither false nor misleading and the contents are based on information and facts that were correct at the time of writing. Pivotal Planning Pty Ltd accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in information in this publication.*

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 8:16:22 PM  
**Attachments:** [bankstown-tod-submission.pdf](#)

---

Submitted on Thu, 29/08/2024 - 20:14

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2190

**Please provide your view on the project**

I am just providing comments

**Submission file**

[bankstown-tod-submission.pdf](#) (69.11 KB)

**Submission**

Please find PDF named 'Bankstown TOD Submission' attached.

**I agree to the above statement**

Yes



### **Introductory comments:**

- We are writing as long-term residents of the Bankstown area.
- We generally approve of the changes. However, we would like the newly developed area to retain the current feeling of light and spaciousness, and the relaxed atmosphere and community feeling of Bankstown. We would like it to be aesthetically pleasing. This is something we would especially like around the Metro station and plaza, being the entrance to Bankstown. We would also like this feeling to be retained around Paul Keating Park and other common areas.
- We would like there to be more emphasis on culture, the arts and education and other places where people gather and meet.
- We do not want to see poorly built, ugly buildings crowded next to each other with no air and light. We do not want any equivalents of Opal and Mascot Towers.
- We would like the surrounding suburbs to benefit from the changes, especially from the new Metro and hospital, with improved public transport in and out of Bankstown to these suburbs. Connections are currently very poor in the evenings and on weekends.
- We do not want the common attitude of 'it's only Bankstown' to prevail. This current attitude is apparent from the poor upkeep of many public spaces and streetscapes by council. The Metro and the proposed rezoning will make Bankstown an important hub and we would like the planning to focus on high standards and excellence, as well as a vision for the future. One recent, positive development has been the upgrade of Paul Keating Park and surrounds, including the new university campus and relatively new library. This area is very impressive and is being well-used. This is the kind of standard we would like for the whole TOD area.
- The recent opening of the new Metro has had a very positive response. People have been genuinely excited and are very impressed with the outcome. It's exceeded people's expectations in terms of function, as well as its stunning aesthetics, spaciousness and sense of light. This is the outcome we'd like to see for the new Bankstown TOD area and we believe it's possible.

### **Aesthetics**

We would like the following:

- The use of pattern books or similar for new buildings. There are many suburbs in Sydney that have unfortunately been ruined by ugly, badly-placed buildings that clash with each other and are not in sympathy with the area. These buildings often start to peel and show rust and water stains only a few years after being built. The

Premier mentioned a while ago the idea of having Paris-style pattern books for new developments and this is what we'd like to see happen.

- Tree-lined streets with green verges and public seating.
- Micro parks near residential blocks.
- More parkland in general. Paul Keating Park and the ovals are great, but there is not enough green space in the TOD area, especially not on the north side.
- Public art that reflects the history and culture of Bankstown, including First Nations people and all the waves of migrants that have come here.
- Water features/fountains. Perhaps some Arabic-style fountains, in reference to the local Arabic population.
- Aesthetics are important in areas where many people are living in apartments, as the look and feel of a place can either be uplifting or depressing. This will impact on future social cohesion and safety.

### **Apartment quality**

We would like apartments to be of excellent quality and to allow people to live well and comfortably. These are the things we think are necessary for livable apartments that also look good:

- Bricked-in balconies - no clear balustrades and no louvres under any circumstances. Private balconies allow people to dry clothes and keep their bikes, children's toys etc. on their balconies without the building looking messy. While drying clothes etc. on balconies breaches strata rules, people will still do it as it's convenient and economical. Glass balconies and louvres also allow too much heat to enter and will not be practical during hot weather.
- Acoustic quality - apartments need to have good soundproofing. Many families will be moving into an apartment for the first time and they need to be able to live normal lives without receiving noise complaints for the everyday sounds of living.
- Flow-through ventilation.
- Heat insulation.
- Designated parking spots for short-term parking, such as for delivery drivers and carers that drop in for short periods during the day.
- Large apartments with ample living space.
- As mentioned above, no Opal or Mascot Towers. No buildings that start to peel, rust and show water stains after only a few years.

### **Affordable housing**

- 3-10% of affordable housing is not enough. At least 10% of the new housing development needs to be for affordable housing.
- Affordable housing must be included in each development. It's not acceptable to have the affordable housing allocation relegated to separate buildings. This will be immediately stigmatising and is not healthy for the residents of these buildings.

### **Better connection with surrounding suburbs**

In the surrounding suburbs of Bankstown, there are at least two generations of people that hardly use public transport, because of social changes and also because public transport is so poor after 6pm and on weekends. Buses are needed at least until midnight, seven days a week, to get the best use of the future Metro. Other ideas for connections are:

- Taxi ranks/late night taxi ranks
- On-demand buses
- Shuttle buses connecting the main shopping centres of surrounding suburbs and the Metro
- Drop off zones for elderly people, people with a disability, and people with prams/carrying large bags or parcels
- A commuter car park. There is currently an old council car park off West Terrace, a few blocks away from the Metro station. This would be an ideal location for a new car park.

### **Safety after dark**

- Please design the streetscapes, lighting and active areas to allow safety for people walking home or through the area after dark.

### **Green walkways and corridors**

- Please make the streets tree-lined, to ensure a canopy in summer.
- Please plant trees along the Metro line, to create a green corridor. This has been done in other Sydney suburbs, as well as in some country towns. This would be both aesthetically pleasing and cooling.

### **Arts and culture**

- Bankstown currently has a theatre in the Arts Centre and the Bryan Brown Theatre. However, as mentioned above, the Metro and the new development will mean that Bankstown will become a true city centre. Parramatta had the vision to build the Riverside Theatre decades ago and it has been so well-used, attracting top quality

performances, often highlighting the talent and stories of Western Sydney, that it is now being upgraded. Bankstown also needs something similar. If too much land is taken up for residential and business development, this opportunity will be lost.

- There is currently a lot of emphasis on food and dining out in new developments, but not enough on arts and culture, or entertainment. These things make an area livable and desirable. Please make provisions for more performance spaces in the TOD area.
- In recent years, the Festival of Sydney and the Sydney Symphony Orchestra have come out to Bankstown to perform to full crowds. There is a definite interest in the arts in Bankstown.
- Bankstown lost its community college a while ago. This has been a huge loss, as locals need to travel to other suburbs or the city for community classes. A space for a new community college is needed, as it not only allows people to learn new skills and take up new hobbies, but it helps people to connect and make friends. This will be important when new people start moving into the area. Similarly, Bankstown needs space for a community centre. Perhaps some of these facilities could be incorporated into the ground floors of business or residential blocks. This would also activate that area/street and make it safe after dark.
- The newly opened Canterbury-Bankstown First Nations Cultural Hub and Resource Centre is very impressive. Please ensure that it is given space to continue and grow as required.

## **Pool**

- Bankstown lost its pool many years ago and in Greenacre, a nearby suburb, the local pool has been closed for approximately ten years due to structural issues and is about to be decommissioned.
- In Australian culture, pools are traditionally places where people go to exercise, relax and socialise at low cost. They improve quality of life and importantly, they allow people to learn how to swim. Currently, the numbers of drownings in Australia are going up and pools are more important than ever.
- Canterbury Pool is currently being redeveloped and there are several, other pools in the Canterbury-Bankstown Area. However, Greenacre Pool, in Community Place, is approximately 3kms from the TOD area and will be a short drive, bus ride or bike ride away for the large population that will be moving into the area.
- If space can't be allocated for a new pool in Bankstown, can the State government urgently intervene to have the Greenacre pool kept and redeveloped?



### **Heritage - Saigon Plaza**

- It's very positive that Saigon Plaza is being kept for heritage purposes and that there are several building in the plaza being heritage listed. Please keep the plaza open and light-filled - don't overshadow it with tall buildings.

### **Heritage – Olympic Parade Trees**

- We are also very pleased that these trees and this area will be heritage listed. It would be nice to find out who has the foresight to plant these trees and add a memorial to them in the area.
- As mentioned above, we would like to see the whole TOD become tree-lined.

### **Heritage - St Paul's Church**

A disagreement over the church's heritage status has been ongoing for almost ten years with no resolution in sight. We feel it would be a huge loss to Bankstown and to South Western Sydney in general if the church were to be demolished for redevelopment, or damaged in an attempt to keep elements of the church as part of a redevelopment project.

The Anglican Church has been clear that it does not want to heritage list the church, whereas many community members, as well as interested people outside of the area, are passionate about retaining it.

If the rezoning is approved and passed, the church will be in imminent danger of demolition or damage, in which case the State government can intervene. If the TOD passes, would the State place a heritage order on the church?

- Why it should be kept:
  - The church is significant for a number of cultural and social reasons.
  - The Anglican Church has stated (please see link to the Sydney Morning Herald article of 2 July 2023 below) that they intend to preserve the stained glass windows and other features of the church in any redevelopment. However, we have heard that a stained glass artist has commented that the windows will break if this is attempted.
  - The leadlight windows were designed, crafted and installed by Martin van der Toorn, a master craftsman who has crafted more than 800 stained glass windows installed in churches across Sydney, country NSW, other Australian

states, as well as overseas. He has windows installed in St Johns's College, University of Sydney and Concord Hospital. Martin is 95 years of age and lives in North Western Sydney. He migrated from the Netherlands and worked for 11 years in a workshop in nearby Lakemba.

- The State Library holds a collection of Martin's designs, newspaper articles and notes about his work in its Special Collections holding, which is available for public viewing.
- The architect for the church was Norman Whelan McPherson (1900-1980), who designed churches across the state. He was a multi-talented person, who was an organist, artist and architect and obtained his Bachelor of Architecture from the University of Sydney in 1923. Many of his churches on the North Shore and Eastern Suburbs have been heritage listed and kept.
- The parishioners who built the church, who were working class people, displayed a lot of energy, initiative and drive to raise the funds to employ artisans of this calibre and there are still parishioners alive today that remember these efforts.
- The story of the church's development is a quintessential Bankstown story. It was funded by working class people wanting to create a legacy for future generations. The windows were made by an immigrant artisan who brought his special skills over from another country.
- If Bankstown allows the church to be demolished, it will be another example of 'low expectations' for the area and will demonstrate a lack of awareness and appreciation of the church's social and cultural value. The fact that similar churches designed by the same architect have been protected in Sydney's affluent suburbs will make it even more unfortunate.
- The church also holds the remains of several past ministers and World War 2 veterans, as well as memorials to parishioner soldiers that died in WW2 battles. In effect, it is a war memorial and a war grave.
- We understand that Canterbury-Bankstown Council and the Heritage Council of NSW have been sent large amounts of information supporting the case for heritage listing the church.
- We also understand that one of the heritage researchers on the church will be making a submission on the TOD.
- We have further supporting information on the merits of keeping the church if you would like contact us.

The following links provide more of a background on the church, its significance and related issues:

- Interview with Martin van der Toorn and Norma van der Toorn: [Martin & Norma Van Der Toorn by JeffHamilton\\_glassartist \(soundcloud.com\)](#)
- Entry in the [Encyclopedia of Australian Glass in Architecture](#), which includes information about Martin: [RADECKI, John \(1865-1955\) | The Encyclopedia of Australian Glass in Architecture](#)
- Daily Telegraph article, 28 September 2015: [St Paul's Anglican Church redevelopment plans held temporarily by Bankstown Council heritage order | Daily Telegraph](#)
- Sydney Morning Herald Article, 2 July 2023: <https://www.smh.com.au/national/nsw/anglican-diocese-fights-heritage-orders-that-prevent-church-redevelopment-20230622-p5dip2.html>
- Sydney Morning Herald article, 23 August 2023: <https://www.smh.com.au/national/losing-our-religion-inside-the-plan-to-future-proof-sydney-s-faith-20230822-p5dyjz.html>

Possible resolution:

- Given the building's significance and the long-standing impasse on its status, would the State government heritage list the church; purchase the church and surrounding land; deconsecrate it; and make it into a community space, concert venue, or similar, multi-purpose space for Bankstown? While it would be disappointing to some parishioners to lose the use of the church, it would allow the building to be kept, used and appreciated by future generations, which was one of the reasons it was originally built. It would also be a win for the Anglican Church, as they would be paid for the property and would be able to move on from this issue.
- The church is surrounded by green space, which could become a public park. This will be especially important when high rise buildings go up around it.
- The church is near the civic zone of the TOD and turning it into a public/community space would be in keeping with the area.
- The new hospital will be across the road from the church, and a park and beautiful building could be used as a peaceful place for contemplation by staff, patients and visitors.
- The church has an organ, which could allow for lunchtime and other concerts for local workers, students and music-lovers. It could also be made available to organ students for practice.

**In summary we would like the development of Bankstown to be driven by a vision of:**

- a refreshed city centre that is green, pleasant to live in, work in and visit
- a well-built place
- an aesthetically pleasing place
- a safe place
- a healthy place
- a place that is vibrant with meeting places, community and culture
- A place that is fresh and modern, but also remembers, respects and treasures its heritage and history.



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 10:44:33 PM

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Submitted on Thu, 29/08/2024 - 22:43

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Rashid

### **Last name**

Saleh

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Yagoona

### **Please provide your view on the project**

I object to it

### **Submission**

To Department of Planning, Housing and Infrastructure,

I am writing to provide feedback on the current rezoning proposal for Bankstown. While I appreciate the efforts made to enhance the area's development, I am concerned that the proposed density may not fully address the growing needs of the community and the potential of the site.

Sydney faces a critical housing shortage, exacerbated by population growth and limited available land. The Bankstown TOD area offers a prime opportunity to address this issue through increased density. By allowing for taller and more extensive residential developments, we can significantly boost housing supply in a well-connected and strategically located area. This approach not only alleviates pressure on other areas but also ensures that new housing is provided where it is most needed, reducing overall housing

costs and improving affordability.

Increased density around major employment hubs such as the hospital can stimulate the local economy. High-density development attracts businesses, enhances retail opportunities, and fosters a dynamic economic environment. More residents in close proximity will support local businesses, including cafes, shops, and service providers, creating a thriving local economy. The economic multiplier effect of increased density means that every dollar spent by residents can generate additional local economic activity, benefiting the community as a whole.

The Bankstown TOD area represents a valuable land resource within Sydney. To make the most of this asset, increased density is crucial. Low-density development in this area would result in inefficient land use and missed opportunities for maximising the benefits of nearby infrastructure. By increasing density, we ensure that the land is used efficiently, providing more housing and amenities in a manner that supports sustainable urban growth.

The forthcoming metro station is a significant infrastructure investment that will greatly enhance connectivity and accessibility. However, its full potential can only be realised if there is sufficient residential and commercial density nearby. Higher density development ensures that the metro station is well-utilised, maximising the return on investment for this critical piece of infrastructure. Increased residential density will lead to greater use of public transport, reducing reliance on private vehicles and contributing to a more sustainable urban environment.

The Bankstown TOD area represents a valuable land resource within Sydney. To make the most of this asset, increased density is crucial. Low-density development in this area would result in inefficient land use and missed opportunities for maximising the benefits of nearby infrastructure. By increasing density, we ensure that the land is used efficiently, providing more housing and amenities in a manner that supports sustainable urban growth.

I urge the department to reconsider the proposal and incorporate higher density provisions to ensure that the Bankstown TOD area reaches its full potential as a vibrant, sustainable, and economically robust community.

Sincerely,  
Rashid Saleh

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 10:51:34 PM

---

Submitted on Thu, 29/08/2024 - 22:51

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Fatin

**Last name**

Mohammad

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Bankstown

**Please provide your view on the project**

I am just providing comments

**Submission**

Dear Sir/Madam,

Bankstown is a rapidly growing area with increasing demands for housing, commercial spaces, and infrastructure. The current rezoning proposal appears to fall short in terms of the density necessary to meet these demands effectively. I would like to highlight several reasons why increasing the density should be considered.

The Bankstown TOD precinct is a valuable land resource that should be used as efficiently as possible. Low-density development in this area would result in underutilisation of the land, limiting the potential benefits of nearby infrastructure. Higher density development ensures that the land is used effectively, accommodating more residents and businesses within a compact footprint.

Efficient land use is essential for sustainable urban development. By increasing density, we can make better use of available land, reducing the need for sprawling suburban development and preserving open spaces and natural environments. This approach aligns with sustainable development principles and supports the creation of vibrant, well-connected communities.

Increased density allows for a diverse range of housing options, which is essential for meeting the varied needs of the community. High-density developments can accommodate different housing types, from affordable apartments to high-end residences, catering to different income levels and lifestyle preferences.

Providing a range of housing options supports a more inclusive and equitable community. It ensures that all residents have access to suitable housing, regardless of their economic situation, and promotes a diverse and balanced urban environment.

Higher density developments are often associated with more sustainable building practices. Tall buildings and denser housing can incorporate advanced energy-efficient technologies and design principles, reducing their overall environmental impact. By increasing density, we can encourage the adoption of green building standards and sustainable development practices.

Sustainable development is crucial for addressing environmental challenges and promoting long-term ecological health. By prioritising higher density, we can support the creation of environmentally responsible buildings and contribute to broader sustainability goals.

The newly confirmed location of the Bankstown Hospital is a key factor that demands a reconsideration of density levels. Hospitals serve as significant employment hubs, attracting healthcare professionals, administrative staff, and support workers. Increasing the residential density around the hospital would provide essential housing close to these employment opportunities, thereby reducing commute times and supporting a more stable workforce. Higher density also fosters a supportive environment for the hospital's services, creating a thriving local community that benefits from proximity to healthcare facilities.

The influx of jobs generated by the hospital is expected to be substantial. To effectively cater to this demand, we need to ensure that there is ample housing in the vicinity. By raising density, we can accommodate not only the hospital staff but also their families, enhancing the overall accessibility and convenience of living near their place of work. This strategic alignment between employment and housing will bolster the effectiveness of the hospital as a central community asset.

Thank you,  
Fatin

**I agree to the above statement**  
Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 11:00:15 PM

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Submitted on Thu, 29/08/2024 - 22:59

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Syed

### **Last name**

Bashir

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Punchbowl

### **Please provide your view on the project**

I object to it

### **Submission**

Attention: DPHI Assessment Team

I am writing to offer my feedback on the proposed rezoning for Bankstown. I believe that the current density targets may not adequately address the area's needs and potential.

The Bankstown TOD area represents a critical piece of land within a highly accessible urban zone. To make the most of this land, increasing density is essential. Low-density development in this prime location would result in inefficient land use, limiting the potential benefits of nearby infrastructure and services. Higher density allows for more effective utilisation of land, accommodating a larger population and supporting a range of community amenities.

Efficient land use is crucial for sustainable urban development. By focusing on higher

density, we can optimise the use of available land, reducing the need for sprawling suburban growth and preserving green spaces. This approach aligns with best practices in urban planning, ensuring that land resources are used to their fullest potential.

The construction industry is facing significant financial pressures due to escalating costs of materials and labour. Increasing the allowable density for new developments can improve the financial viability of construction projects by achieving economies of scale. Taller buildings and higher-density developments reduce the per-unit cost, making projects more feasible despite rising expenses.

Moreover, addressing these feasibility issues is crucial for maintaining a steady flow of new developments. With higher density, developers can better absorb increased costs, ensuring that essential housing projects can proceed without financial strain. This is particularly important in the current economic climate, where many construction companies are struggling to remain viable.

Higher density development is a key driver of local economic growth. More residents in the area will support existing businesses and attract new commercial ventures, from retail outlets to restaurants and service providers. This increase in economic activity leads to job creation and a more vibrant local economy, benefiting both businesses and residents.

Additionally, higher density can stimulate further investment in the area. Investors are drawn to high-density locations due to the potential for higher returns and a larger customer base. This influx of investment supports job creation, enhances local services, and contributes to a thriving economic environment, ultimately strengthening the community's financial health.

The soon-to-be-built metro station is a game-changer for the Bankstown area, promising enhanced connectivity and reduced travel times. To fully capitalise on this infrastructure, increased density is crucial. High-density development ensures that the metro station is well-used, justifying the substantial investment made in its construction. A greater residential and commercial population around the station will drive higher patronage, making public transport a more viable and attractive option.

Furthermore, high-density development around the metro station contributes to more efficient and sustainable urban growth. It encourages a shift from private car use to public transport, helping to alleviate traffic congestion and reduce the carbon footprint of the community. This alignment with broader sustainability goals underscores the need for a density uplift to realise the metro station's full potential.

In summary, the current rezoning proposal for the Bankstown TOD precinct does not adequately address the need for increased density. Higher density is essential to fully leverage the benefits of the new hospital, metro station, and existing amenities, address housing shortages, and support sustainable urban development.

Thank you,  
Syed Bashir



**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 11:40:29 PM  
**Attachments:** [sydney-alliance-submission-for-the-bankstown-tod.pdf](#)

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Submitted on Thu, 29/08/2024 - 23:37

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Jessica

### **Last name**

Harrison

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

2193

### **Please provide your view on the project**

I object to it

### **Submission file**

[sydney-alliance-submission-for-the-bankstown-tod.pdf](#) (1.1 MB)

### **Submission**

Please see our attached submission document. Thank you.

### **I agree to the above statement**

Yes

## Healthy and Stable Living- Community Priorities for the Bankstown Transport Oriented Development (TOD)

Our Muslim Community is proud to have deep roots in Bankstown. The Muslim community has been part of the Australian fabric from the very beginning of this nation and has been part of the Bankstown community for many decades.

As an Imam, my role is to guide people in their spiritual needs and support and advocate for their livelihood needs. Families in my community are struggling with rent, rising energy bills, and the rising cost of living. Newly established families are struggling to find a place to rent or a home to own. We welcome the NSW Government's recent decision and action to address the housing crisis in our city. The Bankstown TOD is an opportunity to make a real difference to our community in Southwest Sydney. However, our community will only see the benefits of this program if the government ensures that it provides more affordable housing. We are deeply concerned that members of our community won't be able to afford to remain in Bankstown if the local TOD doesn't provide enough affordable housing.

**We ask that the Bankstown Accelerated Transport Oriented Development provide 15% allocated Affordable housing in perpetuity and that the homes built are of good quality to keep our communities healthy and safe.**

We stand strong and united with the diverse communities and organisations across Sydney that are calling for healthy and stable living in Bankstown.

**Imam Shadi Alsuleiman**

**President- Australian National Imams Council (ANIC)**



*28th February 2023, the Sydney Alliance holds a pre-NSW election assembly with more than 900 people in Westmead to get commitments from the then State Treasurer Matt Kean, and then Shadow Treasurer Daniel Mookhey on affordable housing, clean and affordable energy and rental reform.*



## **INTRODUCTION**

The Sydney Alliance is a broad-based coalition of civil society organisations across Sydney. Our members are trade unions, community organisations, faith groups and schools who come together to work for a more fair, just and sustainable Sydney. We are a non-partisan organisation. This submission will outline our coalition's principle asks for the Bankstown Transport Oriented Development plan as well as include several testimonies of support from our diverse membership and colleagues.

We appreciate the opportunity to give input on the Bankstown TOD plans and also commend the Department's decision to extend the submission deadline. We are looking forward to working together with all levels of government to ensure that the Bankstown TOD meets the needs of the community.

<b>Contents</b>	<b>Page</b>
Affordable Housing for Bankstown	3
Quality Homes for Healthy Communities	5
Testimonies and Expressions of Support	9

### **ACKNOWLEDGEMENT OF COUNTRY**

The following acknowledgment has been drawn from the Uluru Statement from the Heart. Aboriginal and Torres Strait Islander tribes were the first sovereign nations of the Australian continent and its adjacent islands. It was possessed under their lore and customs. This, the ancestors did, according to the reckoning of Indigenous cultures, since the Creation and according to science since more than 60 000 years ago.

Aboriginal and Torres Strait Islander cultures are the oldest continuous cultures on this planet. This is something that all of us should be proud of. Tonight we are meeting on the lands of the Daruk and Eora Nations, of the Bediagal clan. We thank the Bediagal peoples for caring for these lands and our rivers for thousands of years. We are grateful to all First Nations for caring for this Country that we all now call home. We pay our respects to Elders past, present and emerging. We acknowledge the crucial role that Elders play in the continuing of knowledge and culture.

There are many places of significance to Daruk and Eora peoples around Canterbury-Bankstown. In what we now call Undercliffe, around what is now called the Cooks River, there is a rock shelter with etchings and paintings dated to be between 1000 and 5000 years old. This area was also the site of Aboriginal resistance to British invasion. Tedbury, who was a son of legendary warrior Pemulwy – led the local resistance. He is remembered in murals and plaques in Punchbowl and Undercliff.

Our Alliance humbly accepts the invitation of the Uluru Statement from the Heart. We do this because we believe that to build a more fair, just and sustainable Sydney we have to walk together with Aboriginal and Torres Strait Islander communities.

## **AFFORDABLE HOUSING FOR BANKSTOWN**

Low and moderate income households who have called the Bankstown area home for generations are being displaced in real time from a deficiency in affordable housing in the area<sup>1</sup>. The Sydney Alliance welcomes the Department's proposal to increase density and uplift in the designated Bankstown TOD area **only if this increased density has 15% of allocated Affordable Housing**. Simply building more homes will not inevitably solve affordability issues in the Bankstown area<sup>2</sup> and **anything less than 15% affordable housing will see a net loss of cheaper housing in Bankstown**. We will continue to see low and moderate income earners, and essential workers, forced out of the area.



Sheik Jalal Chami- Australian National Imams Council taking action to end no-grounds evictions in NSW

LEFT: Sheik Jalal Chami at Bankstown train station gathering community letters of support to end no-grounds evictions alongside young renters from across Canterbury-Bankstown

RIGHT: Monday 29th July- Sheik Jalal Chami addresses the press conference following the Minns' government announcement committing to ending no grounds evictions

We support the proposal providing affordable housing in **perpetuity**, and that this affordable housing is managed by a registered not-for-profit community housing provider (CHP). Our Alliance has continually raised concerns about for-profits becoming CHPs. Letting private for-profit companies run as CHPs will undermine housing security and affordability. **It is imperative the CHPs for the Bankstown TOD is not-for-profit**. Not-for-profit CHPs are the only providers with proven track records in delivering genuinely affordable housing.

**We are deeply concerned that anything less than 15% affordable housing in this development is grossly inadequate to stop more low to moderate-income households from being forced out of Canterbury-Bankstown**. We know that the Canterbury-Bankstown local council advocates strongly for our neighborhoods to stay affordable- especially for low income households and essential workers<sup>3</sup>. So

<sup>1</sup> <https://shelternsw.org.au/wp-content/uploads/2024/06/TOD-SEPP-Affordable-Housing.pdf>

<sup>2</sup> [https://shelternsw.org.au/news\\_items/housing-affordability-in-canterbury-bankstown/](https://shelternsw.org.au/news_items/housing-affordability-in-canterbury-bankstown/). See also Ruming, K. J., & Fingland, S. (2021). Delivering Transit-Oriented Development in lower order centres: the case of Epping town centre, Sydney. *Australian Planner*, 57(3–4), 161–176. <https://doi.org/10.1080/07293682.2021.2017990>

<sup>3</sup> <https://haveyoursay.cbcity.nsw.gov.au/draft-consolidated-lep-supporting-studies/draft-affordable-housing-strategy>



we hope that the Department will continue to work with Council to deliver increased supply AND 15% allocated affordable housing.

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*On the 26th of June 2024, 105 renters from across Southwest Sydney gathered at Revesby Uniting Church at a Renters Forum hosted by the Sydney Alliance and the Tenants Union of NSW in partnership with NSW Rental Commissioner Trina Jones. The above image shows the people in the room unanimously voting AGREE that they “need rental homes that are genuinely affordable”*

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In other TODs around Sydney, these developments won't displace existing cheaper housing. But in Bankstown, it's a different situation. ***If we don't have 15% affordable housing in the Bankstown TOD, we will have a net LOSS of cheaper housing in the area.*** It will be an eviction notice to any low to moderate income households wanting to continue living in the area. The cultural leadership of Bankstown has been deeply rooted in affordable housing for multiple generations of migrant Australians. We don't want to see a repeat of the gentrification of the Inner West where we risk losing this specific cultural character of our neighbourhoods.

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*November 2022- Sydney Alliance gathers at the headquarters of the Australian National Imams Council in Chullorah to endorse affordable housing, and fair renting for the Bankstown area*

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LEFT: 26 July 2024- Sydney Alliance leaders from Canterbury-Bankstown meet Mayor Bilal El-Hayek at Yagoona train station to discuss the Council's plan for affordable housing  
 RIGHT: 28 August 2024- Community leaders gather at Bryan Brown theatre in Bankstown, hosted by the National Zakat Foundation and Sydney Alliance, for **15% affordable housing in the Bankstown TOD**

We are also concerned that if the TOD in Bankstown does not have enough affordable housing to prevent displacement, this will significantly undermine community support for the TOD program more generally. The program is being introduced as part of a broader strategy to address a housing affordability crisis. If it does not make meaningful contributions to the provision of affordable homes, the legitimacy of the entire program will rightly be questioned by communities across Sydney. On the other hand, **if the Bankstown TOD grasps the opportunity to increase the supply of affordable housing through mandated minimums, it will secure community support which will contribute to the confidence of communities elsewhere in Sydney about the benefits of TOD.**



28th August- Community leaders gather at Bryan Brown Theatre, hosted by National Zakat Foundation, Sydney Alliance and the Australian National Imams Council to call for 15% Affordable Housing for the Bankstown TOD



## **QUALITY HOMES FOR HEALTHY COMMUNITIES**

We are excited about the opportunities that the Bankstown TOD presents to provide good quality “healthy homes”<sup>4</sup> for our community. **All developments must be built to gold<sup>5</sup> or platinum<sup>6</sup> accessibility standard.** Gold or Platinum accessibility standards, with priority install given to the 15% allocated Affordable dwellings in the Bankstown TOD will further safeguard against the displacement of low to middle income households by these developments. 82% of people with disabilities cannot find housing that meets their needs. **A home that is built to Gold or Platinum accessibility standard is key infrastructure for anyone who wishes to age in place, and stay in their home for their entire life.** By building the Bankstown TOD to at least a gold standard, the Department has an opportunity to save the State money on accessible retrofitting (costs that are higher and that would otherwise be borne by the state through NDIS and Aged Care contributions). Everyone benefits from accessible housing, and this is a crucial component to ensure the Bankstown TOD preserves Bankstown as a connected, welcoming and diverse community.

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From September to October 2023, the Sydney Alliance ran community training on affordable housing, renting reform and clean affordable energy in Campbelltown, Parramatta, Chatswood and Blacktown. We trained 128 people, from 35 different civil society organisations including; Vinnies, Sydney Community Forum, United Workers Union, Western Sydney Migrant Resource Centre, Uniting Church Synod, and the Catholic Diocese of Parramatta.

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To be useful for the community, this should include **a diversity of housing sizes to accommodate diverse household sizes**. It is important that the TOD framework establishes appropriate requirements in this regard, to avoid a misalignment between the type of housing that is required and the type of housing that is provided - as has occurred in recent developments in places like Liverpool.<sup>7</sup>

Part of this quality should include **energy efficiency measures and installing renewable energy like solar panels on the new developments**, with priority access given to the allocated Affordable Housing units in the development<sup>8</sup>. In a Mayoral Minute from the 23rd July Canterbury-Bankstown Council

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<sup>4</sup> <https://www.healthyhomes.org.au/>

<sup>5</sup> <https://livablehousingaustralia.org.au/lha-gold/>

<sup>6</sup> <https://livablehousingaustralia.org.au/lha-platinum/>

<sup>7</sup> Cook, N., Herath, S., & Kerr, S. M. (2023). Suburban densification: unpacking the misalignment between resident demand and investor-driven supply of multi-unit housing in Sydney, Australia. *Australian Planner*, 59(1), 26–38. <https://doi.org/10.1080/07293682.2023.2197604>

<sup>8</sup> Renew Australia for All Campaign- Objective 1: REPOWER HOMES, TRANSPORT & COMMUNITIES with solar, wind and batteries and increased energy efficiency to protect our health and cut energy bills for good.

meeting, Mayor Hayek acknowledges that our area has experienced “record breaking rain” and that “nearly 50% of all days this year have been wet”<sup>9</sup>. This is evidence that our community in Canterbury-Bankstown need homes that will meet the needs of a changing and worsening climate (see image below). **Energy efficiency, and access to renewable energy will ensure these homes are genuinely affordable for people who live in them-** owner occupiers and renters- because people will be able to reduce their energy use and size of their energy bills.

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26th of June 2024- Sydney Alliance and Tenants Union NSW South West Sydney Rental Forum in partnership with NSW Rental Commissioner Trina Jones.

LEFT: community leaders in the room unanimously voting AGREE that they “need rental homes that meet the needs of our changing and worsening climate”, RIGHT: NSW Rental Commissioner Trina Jones sitting with renters listening to their stories

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**Sydney Community Forum’s community research, led by CALD communities, in partnership with Energy Consumers Australia** highlights that lower income households, renters and those living in multi-unit dwellings are at greater risk of being left behind in the energy transition and face significant challenges in accessing the energy services they need to prosper and thrive at an affordable cost”<sup>10</sup>. We support the report’s recommendations and seek commitment they will be applied to the Bankstown TOD. Especially, that **the Bankstown TOD as a new development will “be energy efficient and all electric”<sup>11</sup>, to meet high energy efficiency standards, complying with the NATHERS 7-star rating, and that all levels of government work together to ensure access to renewable energy<sup>12</sup>.**

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<sup>9</sup> [https://www.cbcity.nsw.gov.au/sites/default/files/2024-07/23\\_july\\_2024\\_ordinary\\_business\\_paper\\_0.pdf](https://www.cbcity.nsw.gov.au/sites/default/files/2024-07/23_july_2024_ordinary_business_paper_0.pdf)

<sup>10</sup> “Understanding the diversity of consumers and their experiences of the energy system: Culturally and Linguistically Diverse Consumers Edition” April 2024, pg 5:  
<https://energyconsumersaustralia.com.au/wp-content/uploads/report-insights-deep-dive-diversity-consumers-energy-system-cald-edn.pdf>

<sup>11</sup> ibid

<sup>12</sup> Understanding the diversity of consumers and their experiences of the energy system: Culturally and Linguistically Diverse Consumers Edition” April 2024:



**especially for rental properties, and allocated 15% Affordable Housing within the Bankstown TOD.** We recognise the responsibility to establish an implement these standards and provisions lies with the Commonwealth Department of Climate Change and Energy and seek a commitment that the NSW Department of Planning will work together with them to deliver clean and affordable energy for all in the Bankstown TOD.



20th August 2024- Sydney Alliance connects, in Mandarin and Cantonese, with Chinese-owned small businesses in Campsie to discuss their experiences with affordable housing, clean affordable energy, and connecting with the broader Canterbury-Bankstown community

Incorporating blue and green public space in higher density developments is beneficial for peoples health and mental health<sup>13</sup>. **The Bankstown TOD must be developed consistent with the NSW's Ministry of Health's "Healthy Built Environment Checklist"**<sup>14</sup> to ensure the affordable housing precincts are healthy places to live. Bankstown's access to public green space and bushland per capita is in the bottom 20% of all suburbs in Greater Sydney- ranking 632nd out of 756. Bankstown has 8.55 square metres of green space and bushland per resident, below the WHO recommendation of 9 square metres<sup>15</sup>. **"Areas transitioning to high density [like the Bankstown TOD] should incorporate more open space, including green [and blue] space"**<sup>16</sup> to protect residents' mental and physical health. The Bankstown TOD is fortunate to be in proximity to naturalised blue-green space of the Cooks River and adjacent parkland and "the protection and enhancement of the Cooks River not only has environmental benefits, but important social and economic benefits as well"<sup>17</sup>. Well preserved public bluegreen space near the Bankstown TOD will also boost Bankstown's attractiveness as a tourist, family and business destination.

<https://energyconsumersaustralia.com.au/wp-content/uploads/report-insights-deep-dive-diversity-consumers-energy-system-cald-edn.pdf>

<sup>13</sup> <https://www.powerlab.site/research/publications>

<sup>14</sup> <https://www.health.nsw.gov.au/urbanhealth/Publications/healthy-built-enviro-check.pdf>

<sup>15</sup> E. Brender 2024- "Is Green Space in Greater Sydney Distributed Fairly?"

<https://solartea1.github.io/GreaterSydneyOpenSpace/GreaterSydneyOpenSpace.html>

<sup>16</sup> <https://www.health.nsw.gov.au/urbanhealth/Publications/healthy-built-enviro-check.pdf> PAGE 56

<sup>17</sup> Cooks River Alliance submission 23 Feb 2024- Explanation of Intended Effect: Changes to create low and mid-rise housing. Read more about connection between river health and human health-

<https://cooksriver.org.au/about-us/who-are-we/>




We commend the groundwork that Canterbury-Bankstown council has been doing in planning for increased development around public transport centres. We support the Bankstown TOD proposal working with Transport NSW to ensure public, private and active transport work harmoniously in the Bankstown CBD area to **reduce traffic congestion, and increase access and supply of active and public transport**. Local communities rely heavily on public transport and need an increase in the supply and consistency of public transport including during the construction period of this project and the Metro line.




*Community Leaders gather at Bryan Brown Community Theatre, hosted by the National Zakat Foundation, Arab Council of Australia, Australian National Imams Council and the Sydney Alliance, taking action for 15% Affordable Housing for the Bankstown TOD. Pictured are; Professor Kurt Iveson Head of Urban Geography at University of Sydney, Julie Magill Vice President of the Diversity and Disability Alliance, Sheik Ahmed Abdo and Sheik Jalal Chami members of the Australian National Imams Council and Emilia Nicholas Research Fellow from the Sisters of St Joseph.*








## ENDORSEMENTS AND EXPRESSIONS OF SUPPORT

<p><b>Hassan Moussa</b></p> <p><b>CEO- Arab Council Australia</b></p>  <p>Arab Council Australia المجلس العربي استراليا</p>	<p>Arab Council Australia endorses Sydney Alliance's Bankstown Accelerated Transport Oriented Development (TOD) submission.</p> <p>We advocate for increased funding for affordable housing, ensuring the highest construction standards, prioritising energy efficiency and renewable energy, and planning adequately for green and blue spaces. We believe that everyone in the community deserves equitable access to sustainable, high-quality housing, energy cost savings, and a healthy, quality lifestyle.</p>
<p><b>Abu Muneer Ismail Davids</b></p> <p><b>CEO- National Zakat Foundation Australia</b></p>  <p>National Zakat Foundation™ AUSTRALIA</p>	<p>National Zakat Foundation endorses Sydney Alliance's Bankstown Accelerated Transport Oriented Development (TOD) submission.</p> <p>We have been helping and assisting some of the most needy and vulnerable in our community for over ten years now and daily we see the struggles of rent affordability.</p> <p>We advocate strongly for increased funding for affordable housing, believing that everyone in our community deserves access to safe, sustainable, and high-quality homes. Enhanced funding will not only improve living conditions but also provide significant savings on energy costs. Additionally, it will boost local economies by creating jobs, reduce homelessness and housing instability, and promote social equity by ensuring that all individuals, regardless of income, can enjoy a healthier and more stable lifestyle.</p>
 <p><b>Toby Warnes</b></p> <p><b>NSW Branch Secretary- Rail Train and Bus Union</b></p>	<p>The Rail Tram and Bus Union endorses Sydney Alliance's Submission for Bankstown's Transport Oriented Development. Our members and the community deserve affordable housing that is near their workplace, family and friends and that doesn't place them in social or financial stress.</p>
<p><b>Cassandra</b></p> <p>Raised in Bankstown</p>	<p>My family have more than 80 years of history in Canterbury Bankstown. That ended with me six months ago.</p> <p>I was told I had a choice but, what choice do you have when your choice is to either leave the area you've always loved and known or face certain financial ruin from rental stress and exorbitant energy costs?</p> <p>The average rent per week in the area I grew up in is \$720. We did everything "right". We're young, educated, work full time and yet today I am living almost 40km away and face a 90 minute daily commute to work or deal with certain financial ruin.</p> <p>My question remains "What choice?"</p>
<p><b>Julie Magill</b></p> <p><b>Universal Access Advisory Committee for Canterbury Bankstown Council</b></p>	<p>I've lived in Bankstown for over 50 years and Ive established really beautiful relationships and very close friendships with my neighbours and my community. I really like the place that I'm living in, partly because its really accessible to the shops, amenities, the Paul Keating Park and public transport - everything I need. For people like me with lived experience of disability, Bankstown is pretty easy to get around so we</p>





<p><b>Vice President- Diversity and Disability Alliance</b></p> 	<p>want to make sure that the Bankstown CBD stays an inclusive and accessible place for people with disabilities- which includes keeping Bankstown affordable.</p> <p>The Banksotwn Council has worked with us to keep Bankstown being inclusive and affordable for us, they do a really good job at this. I've built really strong relationships with community leaders and Canterbury-Bankstown Council staff and thank them for their work. I don't want to live anywhere else. Its important to have affordable housing to be able to keep people together, this will help us continue to build community.</p>
<p><b>Angie Zaus</b></p> <p>Roselands resident Member of the Indonesian Muslim community</p>	<p>The housing crisis in Bankstown, with skyrocketing rents and a shortage of affordable housing, has made life really tough since I moved to Roselands from Indonesia 1.5 years ago. Every month, I struggle to pay rent, often cutting back on essentials like food and healthcare, which creates a constant cycle of stress. To make things harder, Roselands lacks green spaces and picnic spots, unlike back home where parks were a big part of our life. Here, it's hard to find places to unwind, adding to the stress of just trying to get by. This situation highlights the urgent need for government action—not just to make housing affordable but to build communities where people can truly live and thrive.</p>
<p><b>Andrew Thomas</b></p> <p><b>Executive Officer- Cooks River Alliance</b></p> 	<p>Living space matters. Research conducted by the Population Wellbeing and Environment Research Lab in Australia, and other research centres across the globe, reveal that where we live has a direct impact on our health and wellbeing. Obesity, type 2 diabetes, dementia and loneliness are on the rise and have been linked to urbanisation that does not prioritise people and contact with nature. But that doesn't mean we can't accommodate more housing, and increase housing density. Done well, we can definitely do both.</p> <p>And this isn't mere speculation. For example, Singapore, with a population similar to Sydney, is known as a leading city concerning land management, integrating green-blue space despite having a population density 18 times that of Sydney. So, we can provide more housing, and we can do it as many other cities have across the world, creating better living space that reduces the burden on our health systems whilst improving social dynamics. Why not? Other cities have, including Copenhagen, Amsterdam, Rotterdam, Stockholm, Germany, Vancouver and Zurich. Why not Sydney?</p>
	<p><b>Dr Michael Walker</b></p> <p><b>Social Justice Facilitator</b> <b>Justice and Peace Office   Catholic Archdiocese of Sydney</b></p> 

	<p><b>John Engeler</b></p> <p><b>CEO- Shelter New South Wales</b></p>
<p><b>Abraham Darouiche</b></p> <p><b>Immediate Past President - Diversity and Disability Alliance</b></p> 	<p>I have lived in Bankstown for the past 20 years, I've grown really fond of the community and established a strong relationship with people here. I've also worked in Bankstown as a peer worker for the past five years, this is part of my connections.</p> <p>I have had the opportunity to have a wonderful home in the community I'm connected to. I need modifications done in my house for my electric wheelchair, it is difficult to find somewhere suitable for my needs that I can afford.</p> <p>If we are going to lift up the price of rent, it's going to pull me back into a dark place when I've been really struggling and it has negatively affected my mental health. Without keeping affordable housing, it would make me want to move out and I would have to start from the beginning again. I've grown so fond of the place that I live, surely the government doesn't want to take that away- I love where I live! If you want me to continue loving my community, work with us and give us affordable housing.</p>
<p><b>Asha Ramzan</b></p> <p><b>Executive Officer, Sydney Community Forum</b></p> 	<p>As a community organisation working closely with communities in Canterbury Bankstown, we have listened to hundreds of people living in acute housing stress. The unprecedented increase in the cost of living has exacerbated this pressure on people in the LGA.</p> <p>More than 15% of the LGA's demography comprises people who arrived in Australia within the last five years (ABS, 2021). Our work in the community suggests that new settlers find it extremely difficult to cope with the high cost of housing and end up in sub-standard dwellings and overcrowded shared housing. Thus, it is extremely important that Canterbury Bankstown TOD must incorporate a minimum of 15% affordable housing provisions.</p> <p>We are the lead organisation of the Voices for Power project, and our research on the energy pressures of CALD communities, highlight the intersection between housing, energy affordability and health. It is crucial that the new constructions in Canterbury Bankstown TOD not only include a minimum of 15% affordable housing provisions but also meet high energy standards, complying with the NATHERS 7-star rating.</p>
<p><b>Nnenna Emechafor</b></p> <p><b>Wesley Mission- youth worker</b></p> <p>Yagoona resident member of the Igbo community</p>	<p>Early this year, we experienced difficulty in securing an affordable house. Having lived in Guildford for some time where I have built strong connections to my African community, we had to look for another accommodation as the landlord kept increasing the rent. Unfortunately we couldn't secure an affordable house in that area hence, we moved to Yagoona.</p> <p>Moving to Yagoona, we pay \$550 per week for a 2 bedroom flat which is still not affordable for us as we have to pay other bills including tuition fees for our 3 children. Moreover, the energy bill has been increasing over the past months with the last bill above \$1300 due by the end of August. Sadly, we cannot afford to use heaters during this cold winter and the</p>

		<p>cold makes my children unwell. Because of my family's experiences, I want to see 15% affordable housing in the Bankstown TOD. Anything less than 15% affordable housing will push families like mine further away from the communities we call home.</p>
	<p>Alex Morales Nok Sothanaphaisan</p> <p>Canterbury Bankstown residents <b>United Workers Union</b></p>	
<p><b>Dr Astrid Perry OAM</b></p> <p><b>Head of Women, Equity &amp; DFV- Settlement Services International</b></p> 		<p>Bankstown is one of the most culturally diverse areas that houses low income families in at times substandard housing. It is essential for future housing to be climate friendly, safe and affordable for Bankstown to continue to thrive.</p>
	<p><b>Yumi Lee</b></p> <p><b>CEO- Older Womens Network</b></p>	<p>We need to take every opportunity to increase the supply of social and affordable housing to end homelessness. The human right to safe, secure shelter should take precedent over the profits of the construction industry. There should be no watering down of social and affordable targets, in fact, the only change should be to increase the targets.</p>
<p><b>Zuzia Buszewicz</b></p> <p><b>Policy and Campaigns Officer- Tenants' Union NSW</b></p> 		<p>Access to safe, stable, healthy housing is a fundamental human right. Having a secure and reliable roof over one's head is the basis for creating a dignified life and building a future. Without access to housing that's affordable, people seeking to build a community and looking for stable employment are forced to continually weigh up their ability to pay rent with the hope of maintaining quality of life.</p> <p>The 15% Affordable Housing benchmark for Canterbury Bankstown will greatly improve the chances of residents from low and middle-income households to remain living within their bustling community. Affordable Housing is one of the levers available to governments wanting to reduce the pressure on renters in NSW. It should be complemented by an investment in public housing, consideration of rent increases regulation, and re-assessment of eligibility criteria for all types of government housing.</p>
	<p><b>Sister Jan Barnett</b></p> <p><b>Josephite Justice Co-ordinator Sisters of Saint Joseph</b></p>	



<p><b>Jesjunnah Ja-im Lopoz</b></p> <p><b>Member- Save the Children, Bankstown</b></p> <p>Bankstown resident</p>	<p>Affordable housing in Bankstown is important to me because it impacts my daily life including budgeting for everyday essentials. Ive got lots of friends in Bankstown I like the community here. I can stay here close to essential services like pharmacy, wet markets and groceries and I love not having to travel far to visit these places. Affordable housing will mean that long term residents wont be pushed out due to rising prices, this keeps people together. Affordable housing is crucial for the community to feel stable, and for me to be able to thrive in the place I call home.</p>
<div data-bbox="151 470 272 680" data-label="Image"> </div> <p><b>Abla Tohamy Kadous</b></p> <p><b>Islamic Womens Welfare Association</b></p>	<p>Many of the members who attended the center for multiple activities continously complain of difficulty in paying their rent as well as their continuous tries in every six months . Also they have to come up with more rental cost . I know some of families that their husband is sending their families back to home due to the unaffordibilty to live here . In many occasion we have to collect money from each others to help them to prevent their moving .</p>
<div data-bbox="136 753 293 890" data-label="Image"> </div> <p><b>Sr Anne Lane pbvm</b></p> <p><b>Convener- Catholics in Coalition for Justice and Peace</b></p>	<p>‘Catholics in Coalition for Justice and Peace (CCJP) heartily endorse Sydney Alliance’s submission to NSW State Government in regard to Bankstown TOD. We strongly believe that such development should provide AT LEAST 15% affordable housing to a high standard, as a matter of urgency, to alleviate rental and mortgage stress, along with increasing homelessness in what is considered a first world nation. We urge the government to be brave in providing this along with appropriate surroundings and infrastructure to ensure livability for all residents.’</p>
<p><b>Sylvia Chui</b></p> <p>Revesby Resident Member of the Chinese community</p>	<p>I am a renter in Revesby, currently living in a place that is over 20 minutes walking distance from the train station and essential shops like grocery stores. As rents have increased rapidly in the area, I find myself unable to afford a room closer to the train station or the centre of the suburb. I support 15% affordable housing in the Bankstown TOD so that people can enjoy the convenience of living close to public transport (a convenience I wish I could afford) whilst still being able to afford the rent and the cost of living.</p> <p>Without a higher percentage of affordable housing, renters like me would be priced out of these communities.</p>
<p><b>Kristyn Crossfield</b></p> <p><b>Executive Officer- NSW Community Alliance</b></p> <div data-bbox="151 1530 485 1646" data-label="Image"> </div>	<p>The NSW Government has demonstrated great leadership in identifying the opportunity presented by Transport Oriented Developments for the Bankstown community. Now, the Sydney Alliance, an alliance of over 35 organisations from across Sydney is calling on the government to extend that boldness of vision to ensure these developments meet the affordable housing targets of 15% so that people already living in these communities can afford to live and work.</p>
<p><b>Israt Jahan</b></p> <p>Wiley Park resident</p> <p>Member of the Bangladeshi community</p>	<p>Living in Wiley Park has been important to me since I arrived in Australia as a migrant. This area holds significance for me due to its cultural connection and my traditional food options as a member of the Bangladeshi community.</p> <p>For me, my family and my community, in Canterbury-Bankstown, having access to more affordable housing and clean, affordable energy is essential for our well-being. The rising cost of housing adds enormous</p>

	<p>pressure on us and having more affordable housing would provide us with stability and peace of mind. It would allow us to stay connected to our community, mosque, and local schools. Access to clean, affordable energy would also make a significant difference. If I had access to renewable energy (which I don't as a renter), it would help me lower my energy use and reduce my energy bills. I would be able to live more comfortably. This should be accessible for people living in the new housing in the Bankstown TOD.</p> <p>Applying the asks of this submission to the Bankstown TOD will help alleviate financial pressure and strengthen our community bonds.</p>
	<p><b>Emma Bacon</b></p> <p><b>Executive Director- Sweltering Cities</b></p>
<p><b>Dr Shanti Raman</b></p> <p><b>Co-Founder and Chair, Hindus For Human Rights- Australia and New Zealand Chapter</b></p> 	<p>Hindus for Human Rights-ANZ advocates for pluralism, civil and human rights in both in South Asia and Australia, rooted in the values of our faith: <i>Shanti</i> (peace), <i>Nyaya</i> (justice) and <i>Satya</i> (truth). Our vision is a world defined by <i>lokasangraha</i> (the universal common good) — where there is peace among all people. As such we strongly advocate with our allies and partner that the Bankstown TOD, and all other similar developments being rolled out across Sydney, are built to meet the needs of our communities.</p>
<p><b>Joel Mccarroll</b></p> <p>Canterbury Resident Member of the Jewish Community</p>	<p>As a renter in Canterbury, I will soon be impacted directly by the TODs program. I object to the current proposal and implore the Department to allocate at least 15% Affordable housing in the Bankstown TOD. As a moderate income earner, with strong personal and professional connections in this area I refuse to let the TOD, which is meant to ease our community's housing stress, displace low and moderate income households from the area. We need a minimum of 15% Affordable housing to allow our community to grow and thrive.</p>
 <p><b>Jenny Kadwell,</b></p> <p><b>Church Council Chair- Revesby Uniting Church</b></p>	<p>Revesby Uniting Church welcomes the NSW Government's efforts to deliver more homes close to transport, jobs and amenities in our community, through the Transport Oriented Development process. Our church is concerned that low and moderate income households are being displaced from our area due to a lack of affordable housing. Urgent action is needed to ensure our communities remain connected, welcoming and diverse. We join with the Sydney Alliance in urging the NSW Department of Planning, Housing and Infrastructure to ensure that new developments include 15% allocated affordable housing, built to a Gold Accessibility Standard.</p>
	<p><b>Sheik Adid Alrubai</b></p> <p><b>Director- Muhajirin Association</b></p> <p>Our Community needs action from you.</p>

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 11:48:58 PM

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Submitted on Thu, 29/08/2024 - 23:48

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Zaniah

### **Last name**

Yusuf

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Yagoona

### **Please provide your view on the project**

I object to it

### **Submission**

Dear DPHI,

I am writing to share my thoughts on the proposed rezoning for Bankstown. While I recognize the efforts to enhance the area, I am concerned that the current density plan may not be adequate to meet the future needs of the community.

Higher density development in the Bankstown TOD precinct will drive local economic growth by increasing the population base and creating more demand for goods and services. This, in turn, will stimulate investment in local businesses and create new job opportunities in sectors such as retail, hospitality, and professional services. A larger, denser population supports a vibrant local economy and helps to sustain and attract new businesses.

Furthermore, higher density can lead to further economic benefits by attracting investment and development projects. Investors are more likely to invest in high-density areas due to the potential for higher returns and a larger customer base. This increased investment supports job creation and contributes to a more robust and diverse local economy.

The Bankstown TOD precinct is a valuable piece of urban land that should be utilised to its fullest potential. Low-density development in this strategically located area would result in inefficient use of land, limiting the benefits that could be gained from its proximity to key infrastructure. Higher density development ensures that the land is used effectively, accommodating a larger population and supporting a range of community amenities.

Efficient land use is critical for sustainable urban planning. By increasing density, we can make better use of available land, reducing the need for extensive suburban expansion and preserving green spaces and natural areas. This approach supports sustainable growth and contributes to a more compact and well-connected urban environment.

The confirmation of the new Bankstown Hospital site provides a unique opportunity to integrate high-density residential development with critical health infrastructure. Hospitals are not only vital for community health but also act as significant employment hubs. To ensure that healthcare professionals and support staff can live close to their workplace, which in turn supports job stability and reduces commuting time, the residential density around the hospital must be substantially increased.

Higher density around the hospital will also foster a supportive community environment, where the benefits of having a major healthcare facility are maximised. This proximity enhances the accessibility of health services for local residents and reinforces the role of the hospital as a central community asset, thus making better use of public investments and improving overall community health outcomes.

Higher density development creates numerous local employment opportunities. Construction projects generate jobs in building, design, and related industries. Additionally, increased residential and commercial activity leads to the creation of jobs in retail, hospitality, and service sectors.

This job creation supports the regional economy and provides a boost to local businesses. By increasing density, we can stimulate economic growth and enhance employment prospects in the Bankstown area, contributing to a more robust and resilient local economy.

Regards,  
Zaniah

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Friday, 30 August 2024 12:13:28 AM

---

Submitted on Fri, 30/08/2024 - 00:13

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Mahveen

### **Last name**

Hana

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Chester Hill

### **Please provide your view on the project**

I am just providing comments

### **Submission**

Dear Sir/Madam,

I hope you are well, I am reaching out regarding the proposed TOD rezoning plan for Bankstown. Bankstown is undergoing significant changes, with an increasing demand for both housing and commercial spaces. The current density proposal seems to fall short of meeting these needs.

High-density development is integral to promoting sustainable transportation. By increasing residential and commercial density around the new metro station, we can encourage greater use of public transport and reduce reliance on private vehicles. This shift supports a more sustainable urban transport network and contributes to reducing the community's carbon footprint.

Additionally, higher density enables the creation of pedestrian-friendly environments. More residents living in close proximity generates demand for safe and accessible walkways, bike lanes, and public transport options. This promotes healthier lifestyles and supports a more integrated and efficient urban transport system.

The planned metro station in Bankstown represents a significant investment in local infrastructure, promising to enhance connectivity and reduce travel times. To fully capitalise on this infrastructure, the area around the metro station must be developed with higher density. This will ensure that the station is well-utilised, justifying the substantial public investment and supporting the efficiency of the public transport system.

High-density development around the metro station will also encourage the use of public transport over private vehicles, which is crucial for reducing traffic congestion and lowering the area's carbon footprint. By aligning development with the metro station, we support a shift towards more sustainable urban transport solutions and promote a well-connected, eco-friendly community.

Sydney's housing market is currently experiencing a severe shortage, characterised by rapidly rising demand and insufficient supply. The Bankstown TOD area represents a prime opportunity to alleviate this crisis through increased density. Allowing for taller buildings and more comprehensive residential developments will significantly increase the housing stock, providing more options for potential residents and addressing the current shortfall.

The existing proposal's low-density provisions are insufficient to meet the growing housing needs of the area. By increasing density, we can boost the housing supply in a strategically located area, helping to address the housing affordability crisis and providing more options for individuals and families looking for homes.

High-density development is integral to promoting sustainable transportation. By increasing residential and commercial density around the new metro station, we can encourage greater use of public transport and reduce reliance on private vehicles. This shift supports a more sustainable urban transport network and contributes to reducing the community's carbon footprint.

Additionally, higher density enables the creation of pedestrian-friendly environments. More residents living in close proximity generates demand for safe and accessible walkways, bike lanes, and public transport options. This promotes healthier lifestyles and supports a more integrated and efficient urban transport system.

Regards,  
Mahveen Hana

**I agree to the above statement**  
Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Friday, 30 August 2024 12:26:11 AM

---

Submitted on Fri, 30/08/2024 - 00:25

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Alishba

### **Last name**

Reza

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Bankstown

### **Please provide your view on the project**

I object to it

### **Submission**

Dear Assessment Staff,

The existing proposal does not align with the pressing need for a more substantial density uplift, especially around the newly established hospital and university. This is of particular concern given the constraints imposed by existing walk-up apartments, which severely limit further redevelopment and, by extension, potential housing supply.

The current density levels are insufficient to address the growing demand for housing and to mitigate the broader housing crisis exacerbated by rising construction costs and labour shortages. The following detailed points outline why a significant increase in density is not just desirable but essential.

The ongoing housing shortage in Bankstown and surrounding areas necessitates a more

aggressive approach to increasing density. The current proposal's lack of density uplift fails to meet the demand for housing, which has only intensified due to population growth and urban expansion. Without a significant increase in allowable building heights and densities, we will not be able to accommodate the influx of new residents, leading to continued pressure on the housing market and rising property prices.

Increased density can facilitate the construction of more residential units, which directly contributes to alleviating the housing shortage. By allowing taller buildings and more intensive use of land, we can boost housing supply more effectively. This is crucial for ensuring that a greater number of people can access affordable and adequate housing. The current proposal's limitations in density simply do not align with the scale of the problem at hand.

The construction industry is currently facing significant challenges due to rising material and labour costs. Many construction companies are struggling to remain viable under these financial pressures. By increasing density allowances, we can make developments more financially feasible and attractive to developers. Taller buildings and more intensive land use can help spread the high costs of construction across a greater number of units, making projects more economically viable.

Higher density developments can offset the increased costs associated with building materials and labour by ensuring that the investment in construction yields a higher return through the creation of more residential units. This is particularly important in an environment where traditional low-density developments may no longer be financially sustainable. The current density levels proposed do not take into account these economic realities and may deter necessary development.

Higher density developments can drive economic growth by creating vibrant, mixed-use communities where residential, commercial, and recreational activities are closely integrated. Dense urban areas often attract businesses, retail outlets, and service providers due to the high volume of potential customers. This economic activity can lead to job creation, increased local spending, and overall economic vitality.

Increased density can stimulate local economies by providing a critical mass of residents who support local businesses and contribute to the economic dynamism of the area. By facilitating higher density development, we can create a more robust and resilient local economy. The current density limits proposed fail to harness the full economic potential of the Bankstown area, resulting in missed opportunities for economic growth.

The current Bankstown TOD rezoning proposal's insufficient density levels are inadequate to address the multifaceted challenges facing the area. A significant increase in density is essential for optimising land use, supporting infrastructure, enhancing economic growth, and improving housing affordability and sustainability.

Regards,  
Alishba Reza

**I agree to the above statement**  
Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Friday, 30 August 2024 12:32:46 AM

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Submitted on Fri, 30/08/2024 - 00:32

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Nader

### **Last name**

Mahmood

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Potts Hill

### **Please provide your view on the project**

I object to it

### **Submission**

The recent rezoning proposal for the Bankstown Transit-Oriented Development (TOD) precinct, while a step forward in urban planning, falls short in addressing the urgent need for increased housing density. Given the strategic location of the new Bankstown Hospital, the proximity to existing shopping and commercial centres, and the forthcoming metro station, there is a critical need to reassess the density targets.

Bankstown's existing shopping centres are established commercial hubs that already attract significant foot traffic. By increasing residential density near these centres, there is an opportunity to enhance their viability and foster a mixed-use environment. Higher density housing will bring more people into the area, boosting the commercial potential of the shopping centres and creating a more dynamic retail environment.

Furthermore, integrating higher density housing with shopping centres can reduce the

reliance on cars, as residents will have convenient access to essential services and retail outlets within walking distance. This aligns with sustainable urban planning principles, promoting walkability and reducing the carbon footprint associated with commuting. Enhanced density will also support local businesses by expanding their customer base and ensuring their long-term sustainability.

The confirmation of the site for the new Bankstown Hospital represents a significant catalyst for urban regeneration. Hospitals are key employment hubs and attract a diverse range of healthcare professionals, patients, and visitors. To capitalise on this opportunity, the area surrounding the hospital must be developed with higher density residential buildings. Increased density would support the hospital's operational needs by providing a ready pool of housing for medical staff and ancillary workers. This would also foster a vibrant community close to essential health services, improving overall quality of life and accessibility.

Moreover, a higher density around the hospital can stimulate local economic growth. The influx of residents and workers would generate additional demand for services and amenities, creating opportunities for local businesses. This symbiotic relationship between the hospital and increased residential density could transform Bankstown into a thriving health and community precinct, rather than a low-density residential area with limited vibrancy.

Australia is experiencing a significant housing shortage, exacerbated by rising population levels and inadequate supply. The current rezoning proposal does not meet the scale required to alleviate this issue. Increasing density in Bankstown is crucial to addressing the housing gap, particularly in a region poised for growth due to its strategic location.

Higher density developments can contribute substantially to housing supply by accommodating more residents per square metre of land. This approach can help mitigate the pressures on the housing market, making home ownership and rental accommodation more accessible to a broader segment of the population. Without a substantial increase in density, the housing shortage will persist, impacting affordability and availability.

The construction industry is currently facing challenges related to rising material and labour costs. Higher density developments can help address these challenges by making projects more financially viable. Increased density allows for more efficient use of construction resources and can reduce the overall cost per unit, making developments more feasible in the current economic climate.

By supporting higher density projects, the industry can continue to operate effectively despite rising costs. This, in turn, ensures that the supply of new housing remains steady and helps to mitigate the impacts of construction cost increases on housing affordability.

I urge the Department to reconsider the density targets and adopt a more ambitious approach to ensure that Bankstown's potential is fully realised.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Friday, 30 August 2024 12:47:59 AM

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Submitted on Fri, 30/08/2024 - 00:47

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Zuhayr

### **Last name**

Rehman

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Wiley Park

### **Please provide your view on the project**

I object to it

### **Submission**

Dear Bankstown TOD Team,

I am writing to express my deep concern and formal objection regarding the current Bankstown TOD rezoning proposal. Upon reviewing the proposal, it is evident that the density increase planned is insufficient given the recent developments in the area. The confirmation of the new Bankstown Hospital site, along with existing shopping centres, commercial areas, and the upcoming metro station, underscores the need for a more substantial increase in density to realise the full potential of this crucial urban area.

Firstly, the new Bankstown Hospital, once operational, will undoubtedly be a major employment hub, bringing a considerable number of jobs to the region. To support this influx of workers and to foster a thriving local economy, it is essential to have a high

density of residential and commercial developments in close proximity to the hospital. This would provide not only housing but also amenities and services that are necessary to sustain a growing workforce. The proposed density increase does not align with this need, which risks underutilising the economic potential of the hospital and limiting the benefits to the local community.

Secondly, the construction industry is grappling with significant challenges due to rising costs of materials and labour. As construction firms face financial pressures, it becomes crucial that developments are economically viable. By allowing for taller buildings and increased density, the projects become more financially attractive to developers. This, in turn, can stimulate construction activity, prevent the closure of construction firms, and ultimately contribute to addressing the housing shortage. The current proposal's density limits may render many projects financially unfeasible, exacerbating the existing issues in the construction sector.

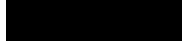
Furthermore, the housing shortage in Bankstown and the surrounding areas is a pressing issue that demands immediate action. The existing walk-up apartments and other low-density developments in the vicinity are substantial constraints on further redevelopment. These constraints limit the ability to increase housing supply, which is critical in alleviating the current housing crisis. The proposed zoning changes do not adequately address this need for additional housing, which could result in prolonged shortages and escalating housing costs for residents.

Additionally, the proximity of the new metro station adds another layer of urgency to the need for increased density. High-density development around transit hubs like the metro station can significantly enhance the efficiency of public transport, reduce reliance on private vehicles, and contribute to more sustainable urban growth. The current proposal's modest increase in density does not leverage the full benefits of this transit infrastructure. Greater density around the metro station would not only support more efficient public transport but also encourage the development of vibrant, accessible urban areas.

In conclusion, I strongly urge you to reconsider the density provisions outlined in the Bankstown TOD rezoning proposal. A revision to allow for taller buildings and higher density is essential to fully capitalise on the area's assets, support the local economy, and address the critical housing shortage. By adjusting the proposal to reflect these needs, we can ensure that Bankstown develops into a thriving, well-supported urban environment that meets the needs of its growing population and contributes positively to the region's future.

Thank you for your attention to this important matter. I look forward to your response and hope for a favourable reconsideration of the proposal.

Yours sincerely,  
Zuhayr Rehman



**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE Bankstown TOD Mailbox](#)  
**Cc:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Subject:** Webform submission from: Bankstown TOD rezoning proposal  
**Date:** Friday, 30 August 2024 12:55:30 AM

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Submitted on Fri, 30/08/2024 - 00:55

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Uzair

### **Last name**

Irani

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Punchbowl

### **Please provide your view on the project**

I object to it

### **Submission**

Dear DPHI,

I am writing to provide a detailed rationale for why the proposed density in the Bankstown Transit-Oriented Development (TOD) precinct should be increased. Given the recent developments and existing conditions in the area, it is evident that the current density provisions are inadequate.

The forthcoming metro station presents a prime opportunity to enhance the accessibility and attractiveness of the Bankstown TOD precinct. Higher density development around the metro station would leverage this improved connectivity, making it more convenient for residents to use public transport. This, in turn, would encourage higher public transport usage and reduce reliance on private vehicles, contributing to more sustainable urban development.

A dense, well-planned development around the metro station would also foster a more vibrant urban environment. Increased foot traffic can support local businesses, create a dynamic street life, and enhance overall urban vitality. This integration of transit and development is crucial for realising the full benefits of the metro infrastructure.

The construction industry is grappling with rising material and labour costs, which has led to a challenging environment for developers. Increasing the density of the Bankstown TOD precinct would make projects more financially viable by increasing the number of units or commercial spaces available for sale or lease. This enhanced economic feasibility is essential for encouraging investment in the area and for ensuring that development projects can proceed despite current market challenges.

Higher density also enables better economies of scale, allowing developers to spread costs over a larger number of units. This can lead to more affordable pricing for consumers and potentially better returns on investment for developers. As such, increased density is a crucial factor in maintaining a healthy and active construction market in the region.

The confirmation of the new Bankstown Hospital as a key development in the precinct requires a significant increase in surrounding density. The hospital will not only create numerous jobs but will also attract healthcare professionals and support staff who will need accommodation. Higher residential density in the area will ensure that there is adequate housing for these workers, thereby supporting the effective functioning of the hospital and the surrounding services it will generate.

Additionally, the presence of a major healthcare facility often leads to an increased demand for ancillary services such as cafes, restaurants, and retail outlets. By increasing density, the area can better support these new businesses, contributing to a vibrant, economically thriving community. This will also help distribute the economic benefits of the hospital more widely within the local economy.

Increased density enables the creation of mixed-use developments, where residential, commercial, and recreational spaces are integrated into a single area. This approach promotes a more vibrant and diverse urban environment, where residents can live, work, and play within close proximity. Mixed-use developments can foster a sense of community and reduce the need for long commutes, contributing to a higher quality of life.

Moreover, mixed-use developments can support local businesses and create a more dynamic urban landscape. The presence of retail shops, offices, and entertainment options within residential areas can enhance the overall appeal of the precinct and attract a broader range of residents and visitors.

Increased density can drive job creation and economic activity by supporting a larger population base and encouraging the development of new businesses and services. Higher residential and commercial density can attract investment and stimulate economic growth, benefiting local businesses and contributing to the overall economic health of the area.

The concentration of people and activities in a high-density environment creates a more dynamic and diverse local economy. It can lead to the establishment of new businesses, the expansion of existing ones, and the creation of employment opportunities, all of which are crucial for a thriving urban area.

Thank you for considering these points. I am available for further discussion and would be happy to provide additional information if needed.

Regards,  
Uzair Irani

**I agree to the above statement**  
Yes