

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 12:59:27 AM

Submitted on Fri, 30/08/2024 - 00:59

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Aisha

Last name

Kaber

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 Assessing Team,

I am writing to express my serious concerns regarding the current rezoning proposal for the Bankstown Transit-Oriented Development (TOD) precinct. After careful consideration, I believe that the proposed density is insufficient, particularly in light of recent and forthcoming developments in the area.

The new metro station is a pivotal infrastructure project that will enhance connectivity and accessibility for the Bankstown area. To fully leverage this investment, it is essential to increase the density around the station. Higher density development will ensure that a larger population is within walking distance of the station, thereby increasing its usage and justifying more frequent and reliable services. This alignment of density with transport infrastructure is fundamental to achieving the goals of transit-oriented development.

Moreover, the increased density around the metro station will contribute to the creation of a more dynamic and pedestrian-friendly environment. A denser population in the vicinity of the station will support local businesses, create lively street scenes, and foster a sense of community. This can lead to a more vibrant and attractive urban area, encouraging further investment and development.

The current density proposal does not fully capitalise on the metro station's potential to transform the area. By increasing density, we can ensure that the station becomes a central hub of activity, supporting both residential and commercial growth. This approach will maximise the benefits of the metro infrastructure and contribute to a more sustainable and efficient urban environment.

The region is experiencing a significant housing shortage, driven by population growth and increasing demand for residential properties. Increasing the density of the TOD precinct is a vital step in addressing this shortage. By allowing for more residential units within the same area, we can increase the housing supply and help alleviate the pressure on the housing market.

Higher density development also enables the creation of a diverse range of housing types, including affordable options. This is essential for meeting the needs of different segments of the population and ensuring that new developments contribute to broader housing accessibility. By providing more housing options, we can better address the diverse needs of residents and support a more inclusive community.

The current density proposal does not sufficiently address the scale of the housing crisis. An increase in density is necessary to meet the growing demand for housing and to provide adequate accommodation for the area's expanding population. By revising the density provisions, we can make significant progress towards resolving the housing shortage and supporting sustainable urban growth.

The recent confirmation of the Bankstown Hospital site represents a significant development that will undoubtedly transform the local area. This new facility will bring with it a substantial number of jobs, from medical professionals to support staff, and these individuals will require housing in close proximity. The current density proposal does not adequately accommodate the increased housing demand generated by this major employment hub. Without higher density development, there may be a shortfall in available accommodation for hospital staff, which could impact the hospital's ability to attract and retain skilled workers.

Additionally, the hospital will likely lead to the establishment of new healthcare-related businesses and services, such as pharmacies, medical offices, and specialist clinics. A higher density in the TOD precinct would support these new enterprises by providing a larger customer base and creating a more vibrant commercial environment. This would not only benefit the local economy but also ensure that the hospital's economic impact is fully realised in the community.

The current proposal fails to take into account the broader economic and social benefits of increased density. By raising the allowable density, we can ensure that the area around the hospital is well-integrated into the urban fabric, supporting both the hospital and the new businesses that will emerge in its wake. This strategic planning approach will help maximise the positive outcomes of the hospital's presence.

It is important to address the constraints imposed by the existing walk-up apartments in the Bankstown area. These buildings, while providing valuable housing, limit the potential for

further redevelopment and restrict the overall housing supply. The current density proposal does not account for these constraints, which can hinder the ability to meet the growing demand for housing.

Increasing the allowable density in the TOD precinct would help overcome these limitations and facilitate more efficient use of land. By allowing for taller and more intensive development, we can better utilise the available space and increase the overall housing supply. This approach will help address the housing shortage and support the broader goals of urban growth and development.

Thank you for considering these detailed points. I am available for further discussion and can provide additional information if needed.

Kind Regards,
Aisha Kaber

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 1:08:42 AM

Submitted on Fri, 30/08/2024 - 01:08

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Nazih

Last name

Masood

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,

Regarding Bankstown TOD rezoning proposal, it is evident that the proposed density is insufficient given the recent infrastructure investments and future developments planned for the area.

The region is experiencing a critical housing shortage due to rapid population growth and increased demand for residential properties. The current density proposal does not adequately address this shortage. Increasing the density within the TOD precinct is essential for expanding the housing supply and helping to alleviate the pressure on the housing market.

Higher density development enables the creation of a wider range of housing types,

including affordable options. This diversity is vital for meeting the needs of different segments of the population, including low-income households and key workers. By providing more housing options, higher density development can contribute to a more inclusive and accessible community.

The current proposal may not sufficiently address the scale of the housing crisis. By increasing density, we can make significant progress towards resolving the housing shortage and supporting sustainable urban growth. This approach will help ensure that the area is equipped to accommodate the growing population and meet its housing needs effectively.

Higher density development allows for the creation of mixed-use environments where residential, commercial, and recreational spaces are integrated. This approach promotes a vibrant, diverse urban area where residents can live, work, and enjoy various amenities within close proximity. Mixed-use developments enhance the quality of life by providing convenient access to essential services and fostering a sense of community.

Additionally, mixed-use developments support local businesses and contribute to a more dynamic urban environment. The presence of residential units, retail shops, offices, and recreational facilities within the same area can attract a wide range of residents and visitors, enhancing the overall vitality of the precinct.

The current density proposal may not fully support the development of mixed-use environments. By increasing density, we can facilitate the creation of integrated, multi-functional spaces that enhance the overall appeal and functionality of the area. This approach will contribute to a more balanced and vibrant urban environment.

The construction industry is currently facing significant challenges due to rising material and labour costs. Many construction companies are struggling to maintain profitability in this environment. Higher density development in the Bankstown TOD precinct would make development projects more financially viable by allowing for a greater number of residential and commercial units within the same area. This increased scale can help offset the rising costs and ensure that development remains economically feasible.

Higher density development offers better economies of scale, which can lead to reduced per-unit costs and make projects more attractive to developers. By allowing for taller and more intensive development, the precinct can support a more sustainable and profitable construction market. This approach is crucial for ensuring that new developments are financially viable and contribute to addressing the housing shortage.

Additionally, higher density can lead to increased competition among developers, potentially driving innovation and improving the quality of new projects. This competitive environment can result in better-designed and more efficient developments, further enhancing the economic viability of the precinct.

It is also important to address the limitations imposed by the existing walk-up apartments in the Bankstown area. These buildings, while providing valuable housing, constrain further redevelopment and restrict the overall housing supply. The current density proposal does not fully account for these constraints, which can hinder efforts to meet the growing demand for housing.

Increasing the allowable density in the TOD precinct would help overcome these limitations and facilitate more efficient use of land. By allowing for taller and more intensive development, we can better utilise the available space and increase the overall

housing supply. This approach is essential for addressing the housing shortage and supporting sustainable urban growth.

Thank you for considering these detailed points. I am available for further discussion and can provide additional information if needed.

Regards,
Nazih Masood

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 1:13:58 AM

Submitted on Fri, 30/08/2024 - 01:13

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Wynne

Last name

Floyd

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 region is experiencing a critical housing shortage, exacerbated by rapid population growth and high demand for residential properties. The current density proposal does not adequately address this shortage. Increasing the density within the TOD precinct is essential to expanding the housing supply and alleviating pressure on the housing market.

Higher density development enables the creation of a broader range of housing options, including affordable housing. This diversification is crucial for meeting the needs of different demographic groups, including low-income households and key workers. By providing a variety of housing types, we can create a more inclusive and accessible community.

The proposed density may not be sufficient to resolve the housing crisis effectively. By increasing the allowable density, we can make significant progress in addressing the housing shortage and supporting sustainable urban development. This approach is vital for ensuring that the area can accommodate a growing population and meet its housing needs.

Bankstown's established shopping and commercial centres are integral to the local economy. Higher density development within the TOD precinct will boost foot traffic to these centres, providing a larger customer base and supporting the viability of local businesses. Increased patronage can lead to the expansion of existing businesses and attract new ones, contributing to a more vibrant and economically active area.

Additionally, higher density can stimulate the creation of new retail and commercial opportunities. As the population grows, so does the demand for diverse services and amenities. By allowing for higher density, we can ensure that the area is well-positioned to meet this demand and foster a thriving commercial environment.

The current density proposal may not provide adequate support for the existing commercial centres. By increasing density, we can enhance the economic vitality of these centres and ensure that they continue to play a central role in the local economy. This approach will contribute to a more dynamic and sustainable commercial landscape in Bankstown.

The forthcoming metro station represents a substantial investment aimed at improving connectivity and reducing travel times for residents. To fully leverage this investment, it is imperative to increase the density around the station. Higher density will ensure that more people are within walking distance, thereby boosting the usage of the station and justifying more frequent and reliable services.

Increased density around the metro station also contributes to a more vibrant, pedestrian-friendly environment. With more residents living close to the station, the area will experience higher foot traffic, which supports local businesses and fosters a lively, engaging streetscape. This increased activity not only enhances the appeal of the area but also creates a more dynamic and economically viable urban environment.

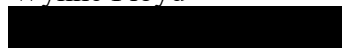
Furthermore, higher density supports the goals of transit-oriented development by reducing the reliance on private vehicles and encouraging the use of public transport. By facilitating a more sustainable transport network, we can contribute to lower carbon emissions and promote a more environmentally friendly lifestyle. This alignment with transit-oriented development principles is essential for maximising the benefits of the new metro infrastructure.

Additionally, it is important to address the constraints imposed by the existing walk-up apartments in the Bankstown area. These buildings, while providing valuable housing, limit the potential for further redevelopment and restrict the overall housing supply. The current density proposal does not sufficiently account for these constraints, which can impede efforts to meet the growing demand for housing.

Increasing the allowable density in the TOD precinct would help overcome these limitations and facilitate more efficient land use. By permitting taller and more intensive development, we can better utilise the available space and increase the overall housing supply. This approach is essential for addressing the housing shortage and supporting sustainable urban growth..

Thank you for the opportunity to provide comment on this.

Wynne Floyd



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 1:18:02 AM

Submitted on Fri, 30/08/2024 - 01:17

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Janice

Last name

Simmons

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 Department TOD Assessment Team,

Sydney is experiencing a critical housing shortage, exacerbated by rapid population growth and high demand for residential properties. The proposed density levels in the rezoning plan do not adequately address this shortage. To alleviate the pressure on the housing market, it is essential to increase the density within the TOD precinct.

Higher density development allows for a broader range of housing options, including affordable units, which are crucial for meeting the needs of diverse population groups. By increasing density, we can provide more housing opportunities and contribute to a more inclusive and accessible community. This approach is vital for addressing the housing crisis and supporting sustainable urban growth.

The current density proposal may not be sufficient to resolve the housing shortage effectively. By permitting higher density, we can make significant progress in expanding the housing supply and accommodating the growing population. This approach will ensure that the area can meet its housing needs and support long-term urban development.

The Bankstown area is home to several established shopping and commercial centres that are vital to the local economy. Higher density development within the TOD precinct will increase foot traffic to these centres, providing a larger customer base and supporting the viability of local businesses. This increased patronage can lead to the expansion of existing businesses and attract new enterprises, contributing to a more vibrant economic environment.

In addition, higher density can stimulate the creation of new retail and commercial opportunities. As the population grows, so does the demand for a variety of services and amenities. By allowing for higher density, we can ensure that the area is well-positioned to meet this demand and foster a thriving commercial landscape.

The current density proposal may not provide sufficient support for the existing shopping and commercial centres. By increasing density, we can enhance the economic vitality of these centres and ensure they remain central to the local economy. This approach will contribute to a more dynamic and sustainable commercial environment in Bankstown.

Higher density development enables the creation of mixed-use environments where residential, commercial, and recreational spaces are integrated. This approach promotes a vibrant, diverse urban area where residents can live, work, and enjoy various amenities within close proximity. Mixed-use developments enhance the quality of life by providing convenient access to essential services and fostering a sense of community.

Furthermore, mixed-use developments support local businesses and contribute to a more dynamic urban environment. The integration of residential units, retail shops, offices, and recreational facilities within the same area can attract a wide range of residents and visitors, enhancing the overall vitality of the precinct.

The current density proposal may not fully support the development of mixed-use environments. By increasing density, we can facilitate the creation of integrated, multi-functional spaces that enhance the overall appeal and functionality of the area. This approach will contribute to a more balanced and vibrant urban environment.

It is also crucial to consider the constraints imposed by the existing walk-up apartments in Bankstown. These buildings, while contributing to the housing stock, limit the potential for further redevelopment and restrict overall housing supply. The current density proposal does not sufficiently account for these constraints, which may hinder efforts to meet the growing demand for housing.

Increasing the allowable density within the TOD precinct would help overcome these limitations and facilitate more efficient land use. By permitting taller and more intensive development, we can make better use of the available space and increase the overall housing supply. This approach is essential for addressing the housing shortage and supporting sustainable urban growth.

Thank you for your attention to these detailed concerns. I am available for further discussion and can provide additional information if required.

Kind regards,

Janice Simmons

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 1:21:07 AM

Submitted on Fri, 30/08/2024 - 01:20

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Stuart

Last name

Chapman

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 Department of Planning, Housing and Infrastructure,

I am writing to express my serious concerns regarding the current rezoning proposal for the Bankstown Transit-Oriented Development (TOD) area. Given the recent confirmation of the new Bankstown Hospital site, the development of a metro station, and the presence of existing shopping and commercial centres, I strongly believe that the proposed rezoning does not adequately address the critical need for increased density in this key area.

The Bankstown TOD area is already well-serviced by existing infrastructure, including shopping centres, commercial facilities, and public transport options. Increasing the density in this area will make better use of this infrastructure, ensuring that it is not underutilised. Higher density development will also reduce the need for additional infrastructure investments, making it a more cost-effective approach to urban planning.

The current proposal does not fully leverage the existing infrastructure, which could lead to inefficiencies and missed opportunities. By increasing density, we can maximise the utility of the available resources, providing better value for money and contributing to more sustainable urban development.

Australia is currently facing a significant housing shortage, and Bankstown is no exception. By increasing the density in the TOD area, we can contribute to alleviating this shortage by providing more housing options for residents. Higher density development will allow for the construction of more residential units within the same area, making it easier for people to find affordable housing.

The proposed rezoning does not sufficiently address the housing crisis, as it does not provide enough opportunities for new residential developments. Increasing density in the area will help meet the growing demand for housing, reducing pressure on the housing market and improving overall affordability.

The development of high-density residential and commercial buildings near the hospital will support local employment opportunities. With more people living and working in the area, local businesses will thrive, creating additional jobs and economic benefits for the community. This is especially important given the current economic climate and the struggles faced by many construction companies due to rising costs.

High-density development will also attract businesses that cater to the needs of the local population, such as retail stores, restaurants, and service providers. This will create a more vibrant and economically sustainable area, benefiting both residents and local entrepreneurs. The proposed rezoning does not adequately address these potential benefits, as it limits the scope for economic growth and job creation.

The current prevalence of walk-up apartments in the Bankstown TOD area imposes constraints on further redevelopment and density increases. These buildings limit the potential for new high-density projects, which is essential for addressing the housing shortage and supporting economic growth. By increasing the allowed density and redeveloping these sites, we can maximise the use of available land and improve overall housing supply.

The existing rezoning proposal does not account for the limitations imposed by walk-up apartments. To overcome these constraints and facilitate more significant redevelopment, it is crucial to provide further density uplift. This will enable a more comprehensive approach to urban planning, addressing both current and future needs for housing and infrastructure.

Thank you for considering my concerns. I look forward to your response and hope that the revised proposal will better reflect the needs and opportunities of the Bankstown TOD area.

Stuart Chapman

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 6:47:33 AM

Submitted on Fri, 30/08/2024 - 06:47

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Dennis

Last name

Jabour

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

I refer to the Bankstown City Centre, Transit Oriented Development State Led Rezoning Urban Design Report prepared for NSW DPHI on exhibition until 30 August 2024, and make the following comments in support, in objection and in general.

I applaud and support the rezoning plan, however I am concerned that if the Commonwealth and State Governments do not relocate their departments, agencies, authorities, and other bodies to Bankstown, the commercial aspirations of the the rezoning report will be a significant failure. If Government relocates its office users to the Bankstown CBD, the corporates will follow. This will underpin a sustainable uplift in commercial space take-up. I recommend that the Report considers its proposed 50% residential and 50% commercial type zoning for certain sites be manifested in a flexible type zoning that can cater for the appetite of the market users at the time of development. Controls can be implemented to test the veracity of the commercial market at that time to

protect the Governments aim to have a vibrant commercial sector.

I represent CPG, a leading commercial real estate agency that has operated in the Bankstown locality for approximately 25 years. CPG intricately understands the commercial market in Bankstown. CPG works in this market every day, week in, week out, every year. The Bankstown CBD is our market.

CPG fully support and welcome the TOD Rezoning Report. CPG applaud the NSW Government in its aim to accelerate the Bankstown CBD rezoning in an effort to assist with its housing policy.

It would however be remiss of me to overlook that this is rezoning is 30-40 years overdue. Bankstown has suffered strategically and commercially and has been left behind in the planning pecking order of metropolitan Sydney as a direct because of the delay in the CBD rezoning.

I understand that in a commercial space sense, the Rezoning Report proposes significant uplift in providing increased commercial space, proposing a 50% Residential and a 50% Commercial type zoning for certain developments. This inflexible type zoning concept provides a significant risk to the Governments plan for the successful development of these rezoned lands.

CPG understands that the Report is projecting an increase in jobs in the Bankstown CBD of approx. 15,000 by 2036. If correct, CPG understand that the Report is anticipating approx. 324,252m² of non-residential GFA to be developed. Under the current commercial sales and leasing market in Bankstown this will most likely remain empty if built. At an estimated \$4,000m² build cost, the construction cost of say approx. half the project GFA, say 150,000m² is estimated to be approx. \$600 Million. The sites identified to be 50% resi and 50% commercial will either remain undeveloped due to the feasibility not staking up or if built, the commercial development space will most likely remain empty for years if not decades. That will be a potential commercial and planning disaster.

Bankstown has not been a location of choice for Corporates and Government departments, agencies, authorities, and bodies for an extended period of time. There is an insignificant appetite for new commercial uses to locate themselves in Bankstown. The commercial market in Bankstown consists mainly of existing local users relocating within the locality. These enquiries consist mainly around <100m² from Government funded NDIS and private educational providers with lease terms between 1 and 2 years due to funding terms. Every six months you might get a 200-300m² enquiry looking to relocate within Bankstown. Bankstown is currently not a new commercial space user market.

The Commonwealth and State Governments must lead the way for the Rezoning Report to be a planning and commercial success. They must consider relocating departments, agencies, authorities, and other bodies to Bankstown, so the corporate users will follow. I believe this will be the most effective strategy to ensure the success of the commercial aspirations of the the rezoning report . I recommend that the Report considers a flexible type zoning that can cater for the market appetite at the time.

By way of example of the commercial market in Bankstown, I note the following most recent commercial developments in Bankstown for your consideration.

It was reported on realcommercial.com.au in May 2024 that 3,400m² remains empty in the Flinders Centre, a premium 10 storey commercial tower completed in 2018, with 10,525m² of commercial space. The Flinders Centre is approx. 300m from the train

station.

Spring Square is a development located approx. 250m from the train station. Commercial space in Spring Square has been marketed for sale from 2020. After 4 years of marketing, 5 commercial suites, from a total of approx. 10 commercial suites, ranging from 88m² to 492 m², remain unsold.

CPG welcome the opportunity to provide more detailed commentary to DPFI if that is sought. CPG wishes the Government and the Bankstown community every future success with this long awaited Rezoning.

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 7:26:05 AM
Attachments: [planning-proposal-submission---46-50-meredith-street,-bankstown.pdf](#)

Submitted on Fri, 30/08/2024 - 07:24

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Bernard

Last name

Moroz

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 am just providing comments

Submission file

[planning-proposal-submission---46-50-meredith-street,-bankstown.pdf](#) (1.58 MB)

Submission

Submission attached to file.

Regards,

I agree to the above statement

Yes

29 August, 2024

NSW Department of Planning
Locked Bag 5022,
Parramatta NSW 2124.

To whom it may me of concern,

Subject: Bankstown TOD Precinct – 46 to 50 Meredith Street, Bankstown

We write in relation to the Bankstown – Transport Oriented Development Precinct, more specifically, the subject site which forms part of the urban core.

In brief, the subject site retains its Mixed-Use Zoning as evidenced in **Figure 1**; however, will be subject to an FSR (3:1) and Height uplift (42m) as identified in **Figures 2 and 3**.

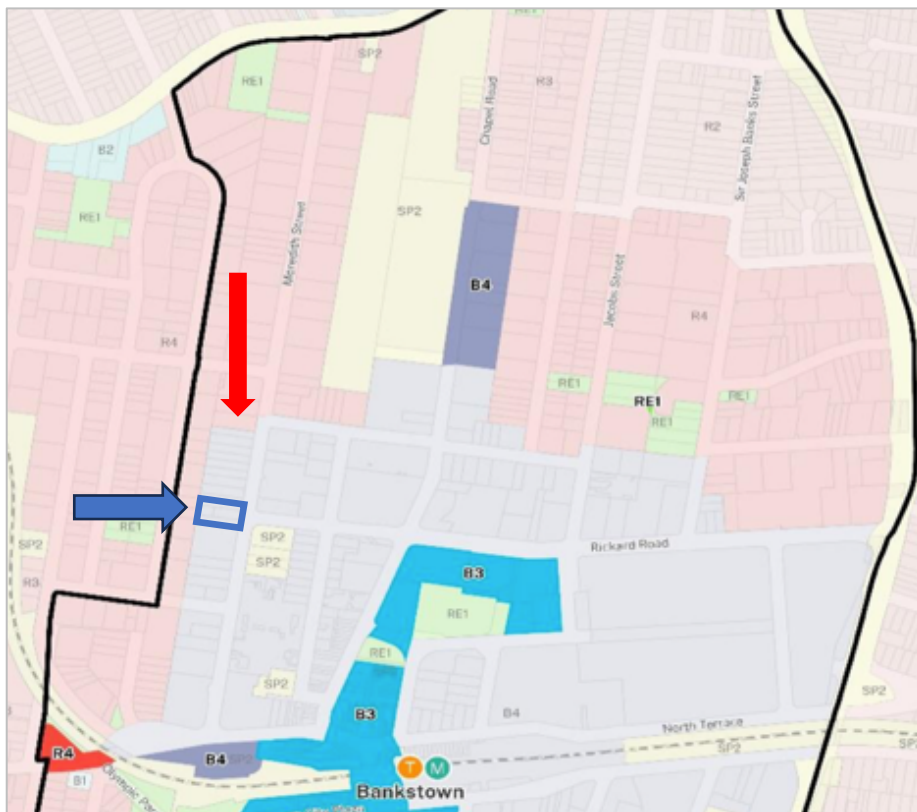


Figure 1: Zoning Map (Proposed)
Source: NSW Government

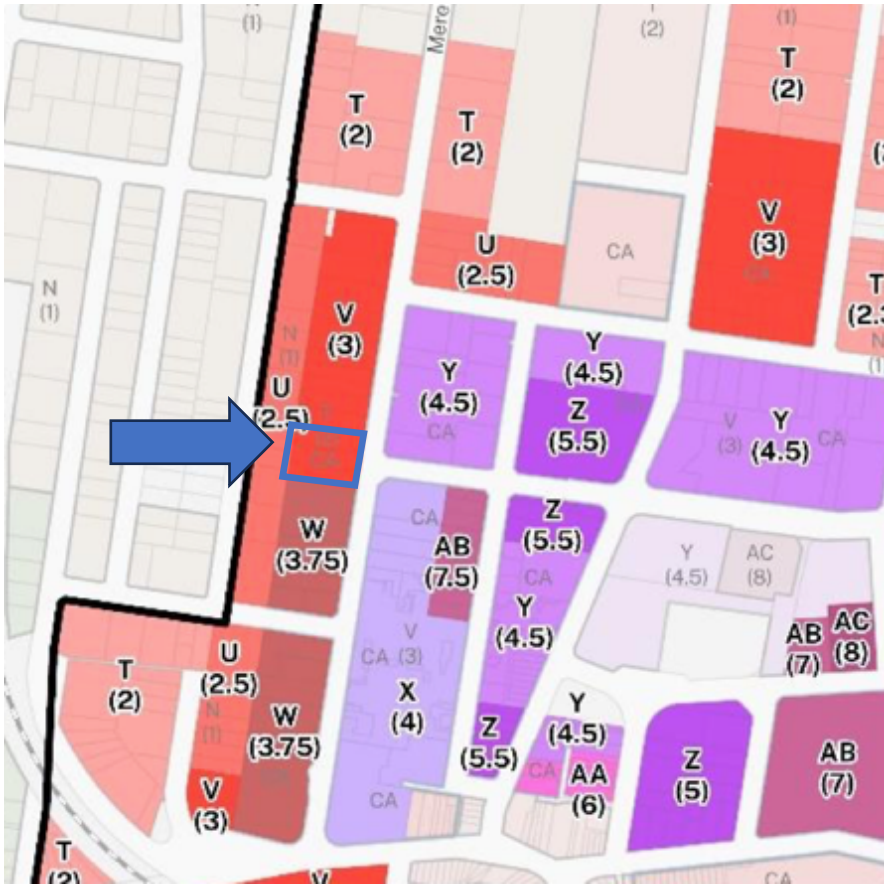


Figure 2: FSR Map (Proposed)
Source: NSW Government

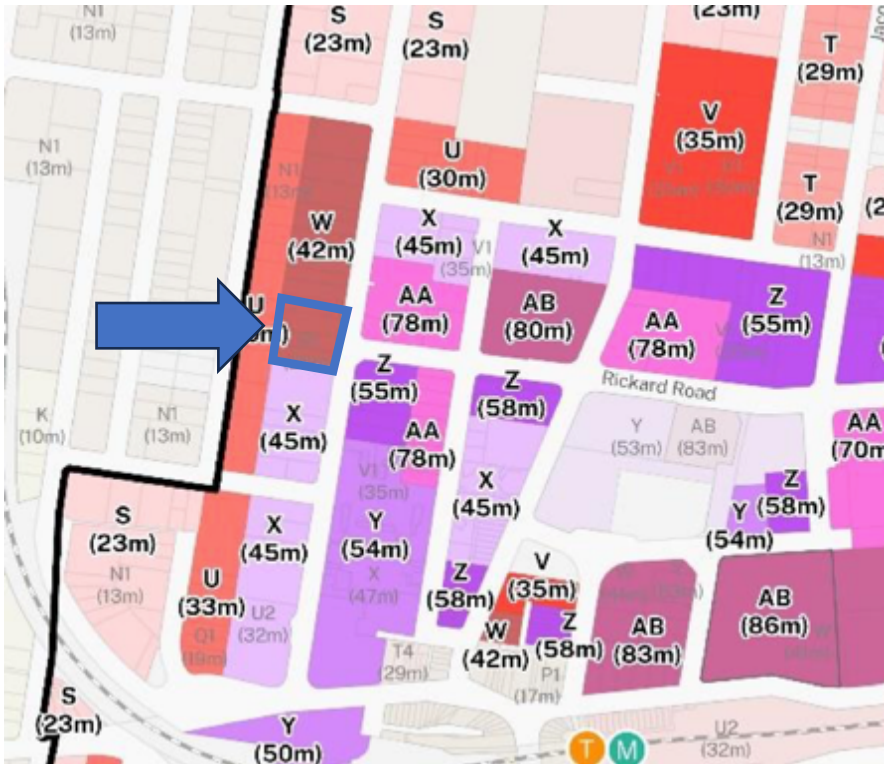


Figure 3: Height Map (Proposed)
Source: NSW Government

Our submission is that there appears to be a level of discord between the extent of future intended FSR and height made available to the subject site when compared to the proximate Mixed Use Zoned land to the south and east of the site.

While it is acknowledged that a transitional scale interface needs to be adopted somewhere within this urban core, it would be in our opinion better placed to the north of the site commencing at 68-70 Meredith Street where a zone transition is identified from the B4 Mixed Use zone to the R4-High density residential zone. We have nominated this interface with a red arrow in Figure 1 of this submission.

This level of potential discord is further exacerbated by way of the proposed heights and FSR's afforded to the subject land when a comparison is run against that intended for the immediate adjoining and identically zoned land adjoining the site to the south.

In brief, the neighbouring site to the south is proposed with a future uplift height of 45m and FSR of 3.75:1 which does not appear to correspond with the 42m and 3:1 FSR proposed on the subject land in terms of achieving intended development capacity.

In order to further exemplify the above claim, we have included below (Figure 4) yield calculations and a block diagram (Appendix 1) that demonstrate in order to achieve the prescribed 42m height on the land, an FSR of 3.55:1 (round down to 3.5:1) would be required.

Site Area	3103m²	
Proposed GFA	11046m²	
Proposed FSR ratio	3.55:1	
Assumptions		
42m height control		
13 levels based on 3.2m floor to floor heights		
generally maintains the building envelope currently approved		
albeit with an extra 6 storeys		
Gross Floor Area		
Category Name	Storey	Area (sqm)
GFA (Apartments)		
	Ground	962.77
	Level 1	1,046.77
	Level 2	1,046.77
	Level 3	1,046.77
	Level 4	847.99
	Level 5	847.99
	Level 6	847.99
	Level 7	847.99
	Level 8	847.99
	Level 9	675.80
	Level 10	675.80
	Level 11	675.80
	Level 12	675.80
		11,046.23 m²

Figure 4: Yield/Height Outcome
Source: Glyde Bautovich

The referenced analysis utilised a preceding development approval on the land DA-550/2018 relevant to demolition of existing site structures, construction of a 7 storey mixed commercial and residential building to be constructed in 2 stages. Stage 1 comprising of a 52 room boarding house with communal living area, managers room, basement car parking and associated landscaping. Stage 2 comprising of 56 apartments with basement car parking and associated landscape works and ancillaries.

In this respect, the baseline approval provided an accurate assumption in terms of an orderly and functioning floor plate layout across a seven (7) storey form. The additional and succeeding height and GFA yield

essentially maintains this established and approved floor layout and in doing so, continues up to the anticipated height limit noting that increased levels of separation are provided in accordance with the ADG requirements.

The resulting analysis outcome concludes that in order to achieve the prescribed 42m height, a '*minimum*' FSR minimum of 3.5:1 should be considered.

Having regard to the above, the premise would be that the intended GFA and height on the neighbouring site to the south of 3.75:1 and 45m is likely to operate well in terms of the ensuing nexus between the height and FSR controls.

In summary, we would therefore seek a reconsideration of the proposed heights and FSR afforded to the subject site on two (2) parts.

Part one (1) would be to continue the proposed 45m and 3.75:1 further north, including the subject site and then terminate at 68-70 Meredith Street which is the commencement of the R4 Zone (red arrow Figure 1). This would result in a more orderly urban design outcome that would clearly and more appropriately define the zoning transition.

Part two (2) would be to retain the existing height across the subject land as proposed at 42m; however, increase the FSR to 3.5:1 as a '*minimum*'. This outcome would enable the generation of a gross floor area that would be more responsive to the height control as demonstrated in our block diagram analysis provided in **Appendix A**.

We thank you for considering this submission and look forward to your response.

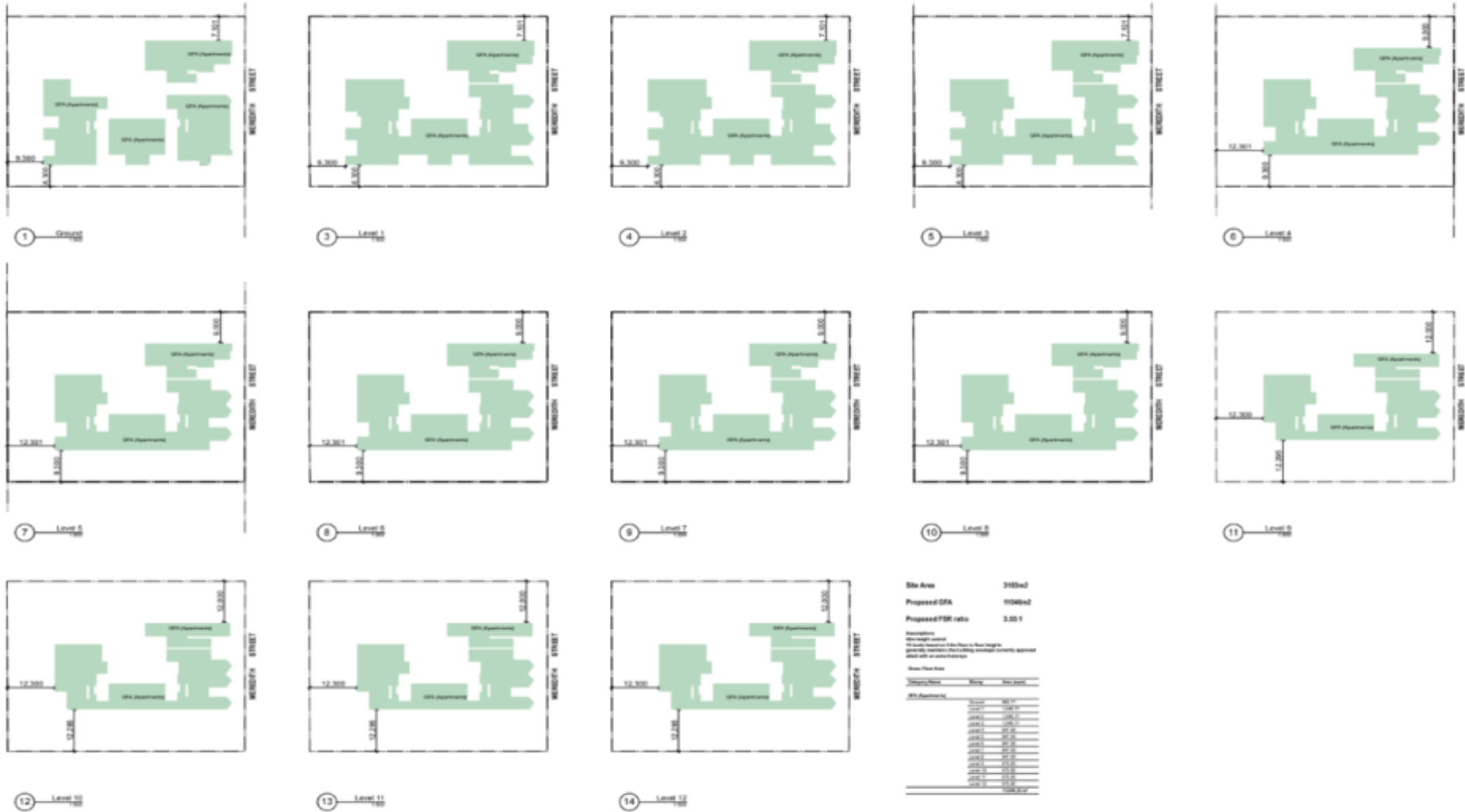
If you require any further detail on what has been provided, do not hesitate to contact the undersigned directly.

Yours faithfully,



Bernard Moroz
Managing Director

Appendix 1: Block Diagrams



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 9:28:16 AM
Attachments: [shelter-nsw-submission---bankstown-accelerated-precinct.pdf](#)

Submitted on Fri, 30/08/2024 - 09:27

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

John

Last name

Engeler

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

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Darlinghurst 2010

Please provide your view on the project

I object to it

Submission file

[shelter-nsw-submission---bankstown-accelerated-precinct.pdf](#) (234.27 KB)

Submission

Please find attached written objection.

I agree to the above statement

Yes

30 August 2024

Department of Planning, Housing and Infrastructure

RE: Bankstown - Transport Oriented Development (TOD) accelerated precinct.

I am writing to you regarding the above proposal which is currently on public exhibition. Unfortunately, **Shelter NSW cannot support the overall EIE or this precinct-specific proposal (in its current forms) and will therefore, be lodging an objection.**

Shelter NSW is the State's peak housing advocacy and policy body. We are a not-for-profit organisation working to ensure policies, practices and legislation recognise the dignity of all individuals through quality, secure, accessible and genuinely affordable housing. Our advice is grounded in evidence and research and is always independent. We are particularly concerned for lower income people, especially renters right across NSW who struggle with 'rental stress' and insecurity.

At Shelter NSW we believe that growth should be fair and inclusive – improving the life of all people; built on the foundation of a secure home for all.

Shelter NSW supports the urban renewal of transit centres in ways that make them more inclusive. In early December 2023, the NSW Government announced the long-anticipated Transport Oriented Development (TOD) program, intended to drive significant increases in housing supply around transport hubs in Greater Sydney, the Central Coast, Illawarra and the Hunter.

Prior to this, Shelter NSW had partnered with the Planning Institute of Australia (NSW) and within the Sydney Alliance calling for substantial proportions of affordable rental housing to be required within any future upzoned transport precincts (under a Mandatory Inclusionary Zoning MIZ framework); and for that affordable housing to be required to be in perpetuity, managed by not-for-profit community housing providers.

To ensure an effective response to local communities we called for master planning and co-operation between levels of Government.

We commend the NSW Government for ensuring that regulated and genuinely affordable rental housing will be a part of any new, well located housing supply. We noted that done

well, and at scale, this could be a game changer for NSW communities and especially low-medium income renters.

We acknowledge that while housing supply is currently constrained (by broader economic conditions) in all likelihood the cyclical housing market will swing back. We want to ensure that when it does, housing supply, especially in denser urban environments is accompanied by an equally strong growth in genuinely affordable and accessible housing (secured and regulated for low-medium income earners).

Since the NSW Government announcements about the overall TOD program (Tiers 1 and 2) we have learned more about the Department of Planning, Housing and Infrastructure (DPHI)'s overall approach and more detail about individual precinct proposals.

We understand that the Tier 1 Accelerated Precincts are Government-led rezonings within an area up 1,200 metres around identified high growth 'priority transport' hubs. Key housing requirements originally announced were for up to 15% 'affordable housing', managed by registered community housing organisations, to be held 'in perpetuity'.

While Shelter NSW understood that the exact details of the affordable housing requirements might vary from the precinct to precinct, we have been very concerned to see potential rates as low as 3% being formally considered by DPHI.

In an overall sense, we are concerned that apparent disparities and inconsistencies (across the Tier 1 precincts) potentially reflect a lack of common principles and coherent approach. With the absence of anything from DPHI to explain its approach, the level of required contributions often appears to be arbitrary, not linked to the specific locational value uplift and changes to the planning controls.

The table below (prepared by Shelter NSW assembled from DPHI data) indicates the various affordable housing rates being considered for each precinct. We have noted the use of ranges (per site) as well as the differences between each of the precincts.

At its least ambitious just **2,835** affordable rental dwellings might be delivered across the precincts versus **6,190** at the Department's high-end but versus the **9,323** we and the broader community might have expected to secure (if a 15% or higher rate was to be applied).

Affordable Housing (AH) in 7 x Accelerated TOD precincts in Sydney					
Kellyville & Bella Vista, Hornsby, Macquarie Park, Crows Nest					
Bankstown, Homebush & Bays West (2025)					
Precinct	Total dwellings	AH -Low end (dwellings)	%	AH -High end (dwellings)	%
K & B	20,700	620	3.00%	1,650	7.97%
Hornsby	5,000	250	5.00%	500	10.00%
Mac Park	4,600	460	10.00%	690	15.00%
Crows Nest	3,255	325	9.98%	490	15.05%
Bankstown	12,500	375	3.00%	1,250	10.00%
Homebush	16,100	805	5.00%	1,610	10.00%
Total	62,155	2,835		6,190	

Source DPHI website

Our key concerns with these proposals:

- **A public and high-profile announcement of up to 15% affordable housing rates was part of the 'density deal' sold to the broader community** – the lower rates being considered undermine the general promise and delivery of the TOD program. In the case of Bankstown that may be as low as 3% (just 375 dwellings versus the 1,875 dwellings the community expected)
- **Proposing a range of affordable housing contributions for an individual precinct is poor practice** and already sending confused signals to the market (with flow on impacts into local communities already subject to property developer 'doorknocking').
- **The lowest common denominator should be avoided** – if the higher affordable housing rates have already been deemed 'feasible' by DPHI it should be adopted (why is this subject to consultation or lobbying efforts?). In the case of Bankstown, if 10% has already been deemed feasible why suggest a lower rate of just 3%?
- In the case of a 15% rate not being committed to upon implementation, there **needs to be a clear provision for the ramping up of these contribution rates over say a three year period** and according to a published schedule. This is consistent with the proposal to do this with the Tier 2 TOD program (though we note, with concern,

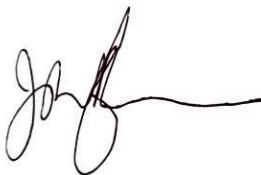
that the NSW Government has not yet published the schedule).

- There **needs to be explicit consideration of the existing low-cost housing (and households) that will be displaced** by development in some of these precincts. This has been a long-held concern for Shelter NSW with the [Canterbury-Bankstown LGA](#) and corridor been long-targeted for housing growth. For more information, I refer you to our published article: [Density Done Well - Not all TODs are Equal - Shelter NSW](#) and specifically this image: [TOD-SEPP-Affordable-Housing.pdf \(sheltersnsw.org.au\)](#)
- **Lack of clear policy and practice expectations guiding the development of TOD Affordable Housing Contribution Schemes (AHCSs)** threatening to undermine the translation of stated policy intentions into affordable homes.
- **Any resulting affordable housing (and tenancies) should be managed by registered Not-For-Profit Community Housing Providers** (not property developers which can be registered as CHPs).

Shelter NSW is also encouraging the NSW Government to look to the future and its legacy. Specifically, we are calling for affordable housing contribution rates to be scaled up from 15% up for Years 4, 5, 6 and beyond, to be applied to the current and any future TOD Accelerated Precinct. Early announcement of this (in 2024) would provide certainty to the market, community and future-proof the housing supply of the TOD program. Importantly, it would enable Greater Sydney and NSW to join the ranks of other global jurisdictions like London, where such requirements are understood and routinely delivered on.

We ask that you give serious consideration to the observation we have made and concerns we have raised. Please do not hesitate to contact us if we can be of assistance.

Yours sincerely,



John Engeler
Chief Executive Officer, Shelter NSW

30 August 2024

Kiersten Fishburn
 Department of Planning, Housing and Infrastructure
 4 Parramatta Square
 12 Darcy Street
 PARRAMATTA NSW 2150

**BANKSTOWN TRANSPORT ORIENTED DEVELOPMENT REZONING PROPOSAL
 EXPLANATION OF INTENDED EFFECT
 WESTERN SYDNEY UNIVERSITY BANKSTOWN CITY CAMPUS**

Dear Ms Fishburn,

1. We refer to the draft Bankstown Transport Oriented Development (TOD) rezoning proposal prepared by the Department of Planning, Housing and Infrastructure (DPHI), which is currently on public exhibition as part of the TOD Accelerated Precincts Program.
2. We note that the EIE proposes new and amended planning controls for the Bankstown TOD Precinct to facilitate:
 - increased housing supply;
 - a variety of land uses within walking distance of the future Bankstown Metro station;
 - delivery of housing that is supported by attractive public spaces, vibrancy and community amenity; and
 - increased affordable housing across the Precinct.
3. The Western Sydney University (WSU) Bankstown City Campus (the site), located at 74 Rickard Road, Bankstown, is within the Bankstown TOD Precinct, as shown in **Figure 1** below.

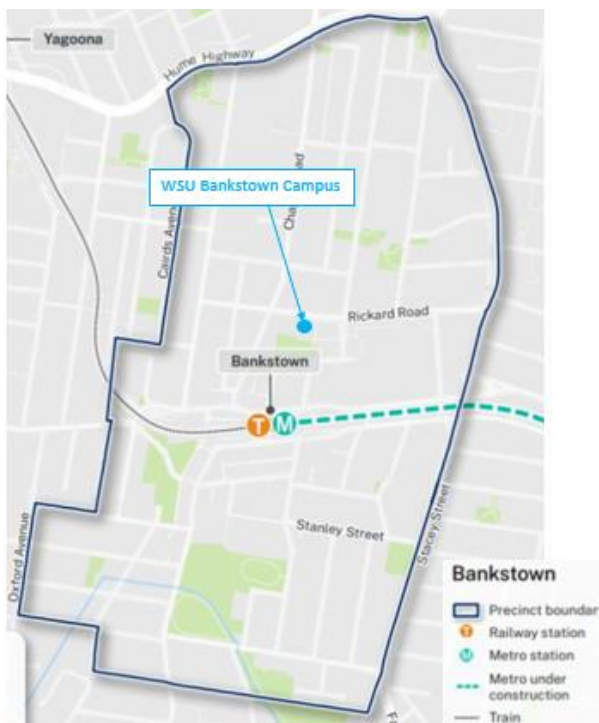


Figure 1: Bankstown TOD Precinct area showing the WSU Bankstown City Campus



Figure 2: The completed Western Sydney University Bankstown City Campus

- The WSU Bankstown Campus was approved by the former Department of Planning, Industry and Environment under a State Significant Development (SSD) Development Application (DA) on 18 February 2021 (DA Reference: SSD-9831). The application approved:

New Campus Building, including:

- construction of a 19-storey building over two levels of basement parking;
- use as a University including learning spaces, research, library, administration and ground floor retail;
- landscaping works, including plantings on terraces within the building and ground level plantings;
- associated road and public domain works, including upgrade of The Appian Way and upgrade of Rickard Road footpath; and
- four signage zones.

- The development has since completed construction and is now an operational university campus (refer to **Figure 2**). The university campus use is defined as an **'educational establishment'**:

educational establishment means a building or place used for education (including teaching) being–

- a school, or
- a tertiary institution, including a university or a TAFE establishment, that provides formal education and is constituted by or under an Act.

- The site is currently zoned B4 Mixed Use under the *Canterbury-Bankstown Local Environmental Plan (CBLEP) 2023*. Educational establishments are currently permissible with consent under the B4 zone of the CBLEP 2023.

- The draft Bankstown TOD rezoning proposes to introduce a B3 Commercial Core zone to part of the precinct. Under the draft proposal, the site would be rezoned from its existing B4 zone to the B3 zone – refer to **Figure 3**.



Figure 3: Current vs proposed land use zoning showing the properties to be rezoned to B3 Commercial Core and the subject site (outlined in a dashed red line) (Source: CBLEP and Draft EIE)

- There is currently no B3 zone in the CBLEP 2023.
- The EIE is unclear whether the proposed B3 zone will permit educational establishments.
- Therefore, we request that DPHI ensure sufficient measures are included in the Bankstown TOD rezoning to permit the continued use of the university campus as an **'educational establishment'**. For example, the land use table for the proposed B3 Zone under the CBLEP should permit 'educational establishments' within the zone. This would ensure that the existing university campus remains permissible within the new zoning and that there are no permissibility issues with the ongoing operation of the building in this location.

11. It is acknowledged that under Part 3.5 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* (SEPP (T&I)) universities are permitted within the zone. However, the LEP should not be inconsistent with the SEPP, and it is requested that the use is permissible under the LEP.
12. Should you require any additional information or wish to discuss the application further, please do not hesitate to contact the undersigned at [REDACTED] or [REDACTED].

Yours faithfully,

Walker Bankstown Developments Pty Ltd



Town Planner

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 10:05:17 AM

Submitted on Fri, 30/08/2024 - 10:04

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████████

Last name

██████████

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

Yes

Info

Email

██

Suburb/Town & Postcode

Yagoona 2199

Please provide your view on the project

I object to it

Submission

Thank you for the opportunity to submit the Bankstown TOD. My name is Nnenna Emechafor. I am a mother of three children. I work as a youth worker with Wesley Mission and reside in Yagoona. Early this year, we experienced difficulty in securing an affordable house. Having lived in Guildford for some time where we built an 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. Moving to Yagoona, we pay \$550 weekly for a 2 bedroom flat which is still not cheap 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 winter just to save energy costs. I don't believe a range is helpful for affordable housing, rather I want to see a higher % of affordable housing in the Bankstown area so I object to this submission. It should be 15% or at least the top of the range 8%. I am concerned that anything less than

15% in the Banstown TOD is grossly inadequate to prevent low to moderate-income householders from being displaced from the Canterbury-Bankstown area. Of note, if we can't achieve 15% affordable housing in the Bankstown TOD, it will result in a net loss of cheaper housing in the Bankstown area. Moreover, if there is not enough affordable housing in the area to stop displacement it will significantly impact the community support for the TOD program. While the increase of affordable housing in the Bankstown TOD will enhance support, boosting support of communities across Sydney concerning the benefits of TOD. I ask that all development must be built to Gold or Platinum standards to safeguard against the displacement of low to moderate-income households via these developments. I also ask that all development must include a diversity of housing sizes to accommodate every household's needs in terms of family size. The TOD development must include affordable energy consumption so that low to middle-income earners can comfortably pay bills, and the installation of solar panels would be beneficial in the area. Finally, the Bankstown TOD should create more green/blue space which is important for the the mental and general wellbeing of its residents.

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 10:06:52 AM

Submitted on Fri, 30/08/2024 - 10:06

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 support it

Submission

Multiple factors must be considered including the need for additional green space available to the public, build quality of new apartments and building defects, increase in other forms of public transport outside of the metro (including increased bus routes that allow residents to access more areas of Sydney without having to travel into the city first), provision of social and affordable housing, and the addition of public carparks located on the fringed of the re-zoned area to allow for people to park their car and walk into Bankstown CBD 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: Friday, 30 August 2024 10:09:04 AM

Submitted on Fri, 30/08/2024 - 10:08

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

Milperra

Please provide your view on the project

I am just providing comments

Submission

Concerns Regarding TOD Proposal

My concerns primarily focus on the 'heat island effect' created by buildings, roads, pavements and other hard surfaces and the poor mitigation of this through a lack of tree corridors and other greenery. This is very concerning for that section of Bankstown which will be subject to development of 20 storeys or higher.

Heat will become such a serious issue for western Sydney because of the increasing challenge of climate change.

High density units and heat will be very challenging for babies, children and the elderly residents residents. Units will become more dependent on air conditioning but lack the roof space to accommodate solar panels.

Climate change is a problem now and will become more challenging with each generation. I noticed the Masterplan drawings of buildings with rooftop trees. Are you kidding? Dangerously high temperatures need to be factored in and mitigation planned for in order to protect people.

Where are the trees to provide shade and cooling? Existing units in Bankstown have these and yet trees are being sacrificed when they are increasingly necessary.

I understand the need to increase housing availability but there are serious concerns regarding the building regulatory framework in NSW. Poorly built high rise apartments are already a risky proposition for owners and investors. It will become more so as climate change escalates.

The problem of housing availability is a strange one as unoccupied dwellings exist now. The previous campus of WSU in Milperra has modern accommodation that was used for students but now sits vacant awaiting redevelopment for housing! This accommodation was funded by the taxpayers and is now wasted. PLEASE PLAN TO PREVENT THE PROBLEMS.

The current site of St Paul's Anglican Church has been listed as suitable for development of 20storeys or higher. This may be convenient for access to the rail and proposed new hospital but Saigon Place is equally suitable. I see the worth of maintaining Saigon Place as it is culturally significant to Bankstown but St Paul's is also culturally important. The Council is aware of this as it engaged Sue Rosen to prepare a heritage report.

St Paul's has high historical, cultural and social value yet it is slated for 22 storey development. This is hard to believe let alone accept. I speak as a citizen not as a member of the Church. My heritage is embedded in Irish Catholicism. I grew up with stories of the English colonising Ireland and famine and the experience of Depression in Australia. My father and uncles were teenagers when they enlisted in World War 11. I respect historical struggles and the value of heritage. I am aware of the privileges I have had in Australia and conscious of the loss that Aboriginal people have endured. Bankstown was the home of Paul Keating who gave the sorry speech in Redfern regarding the treatment of First Nations people. I knew nothing of Aboriginal history until I was engaged in tertiary study and was shocked to discover what I did. The heritage of all the people matter as it fosters respect and understanding.

Plan for the future of the children of Bankstown who will be left a legacy of climate change. Ensure they know the history and heritage of all people who have lived here. Ensure they have trees for cooling and green space. The Aboriginal people knew the value of respecting the land. Do 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: Friday, 30 August 2024 10:22:11 AM

Submitted on Fri, 30/08/2024 - 10:22

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Betty

Last name

Sotiropoulos

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

More consideration of increasing buses routes, potentially bad build quality from developers looking to make money quickly, the impacts of the new hospital on traffic, the increase need for more parks and third spaces, and increase in tree density across the entire TOD precinct, not just certain streets.

If the department and government aren't sure of where Bankstown TAFE will be located, it raises concerns surrounding if this proposed plan has even been able to consider the impact of the TAFE in 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: Friday, 30 August 2024 10:51:51 AM
Attachments: [submission-258-south-terrace-bankstown-nsw-2200-rev-b.pdf](#)

Submitted on Fri, 30/08/2024 - 10:45

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Mark

Last name

Raymundo

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

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Sylvania NSW 2224

Please provide your view on the project

I object to it

Submission file

[submission-258-south-terrace-bankstown-nsw-2200-rev-b.pdf](#) (1.23 MB)

Submission

Please refer to submission as attached.

I agree to the above statement

Yes

Submission: 258 South Terrace Bankstown NSW 2200

MAXIMUS DEVELOPMENTS AUSTRALIA

TOWN PLANNING / URBAN DESIGN / PROJECT MANAGEMENT

12/2 Mowbray Street Sylvania NSW 2224 / 0411 697 051 / mark@maximusda.com.au /
www.maximusda.com.au

SUBMISSION FOR FURTHER CONSIDERATION TO BANKSTOWN TRANSPORT ORIENTATED DEVELOPMENT REZONING PROPOSAL

Ref: 2024-1009

30 August 2024

Kiersten Fishburn
Secretary of the Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Maximus Developments Australia has been engaged to prepare a submission on behalf of owner of the property, Mr Edison Hortis on land known as 258 South Terrace, Bankstown NSW 2200. Whilst the site (258 South Terrace, Bankstown NSW 2200) is not captured within the Explanation of Intended Effects (EIE) it considered that the site is located within a highly accessible location which is directly across from the Bankstown Station/Metro Bankstown Station and should be considered for further consideration for intensification.

The site comprises of approximately over 1,200sqm and forms a corner site with a northern primary frontage to South Terrace and a secondary eastern frontage to West Terrace. The site is currently occupied by a two (2) storey commercial building. This site is located within a highly prominent location whereby the reality is that the real focal centre of the Bankstown City Centre is the Railway Station. It is considered that an opportunity could be thwarted by the limitation of the proposed planning controls.

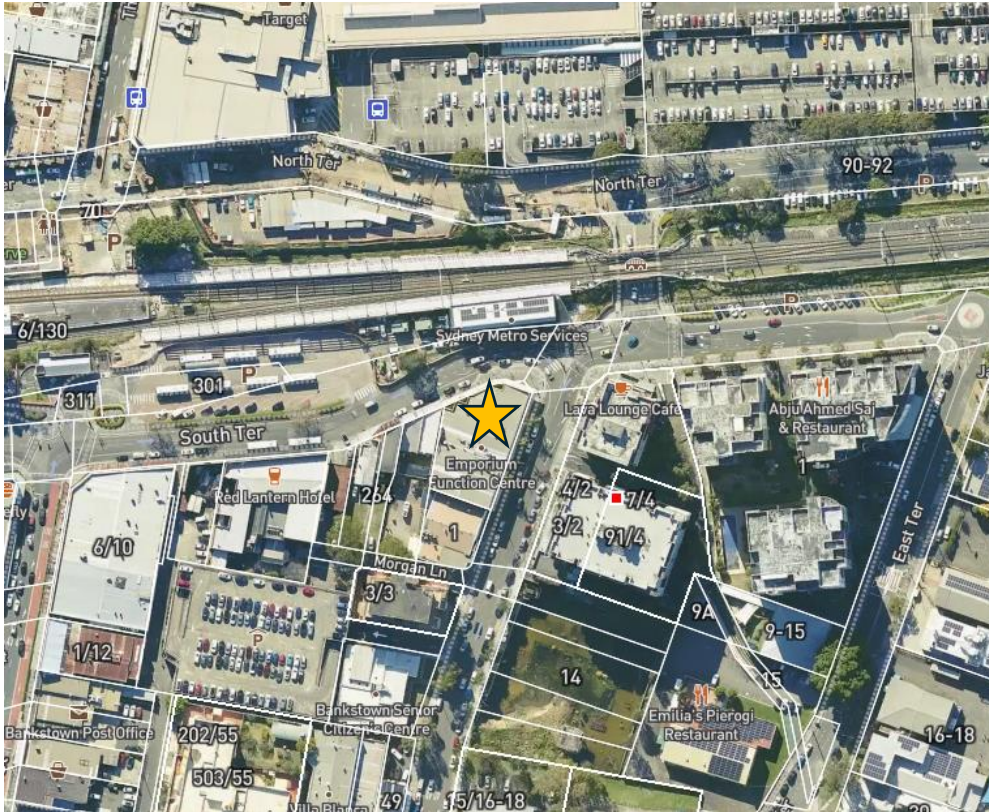


Fig 1. Aerial Extract of subject site (marked with an orange star) and immediate surrounding area. The site 258 South Terrace, Bankstown NSW 2200 is located directly to the south of the Bankstown Metro Railway Station which is currently under construction (Source: Metromaps, 2024).



Fig 2. Photograph of subject site (left) and Bankstown Metro Railway Station (Right) currently under construction (source: Maximus Developments Australia, 2024).



Fig 3. Photograph of subject site and immediate surrounding area which is directly across the Road from the Bankstown Metro Railway Station currently under construction (source: Maximus Developments Australia, 2024).



Fig 4 Adjoining modern shoptop housing along West Terrace, which are unlikely to be redeveloped (Source: Maximus Developments Australia, 2024).

Considerations

Prominent Corner location

The site forms a landmark corner location and having a higher predominant building in this location would reinforce the street corner and contribute to the rhythm of the street. The proposed 58m height limit in this location is not considered to be significant in relation to adjoining height of building limits whereby a 53m height limit applies directly to the east. A higher height of building and floor space around the station would be an appropriate design outcome for the site.

Site relationship to higher densities to the North

It is noted that block bound by West Terrace, South Terrace and East Terrace and are already occupied by recently constructed shop top housing and are unlikely to be demolished for any future uplift. This is due to the lack of significant uplift in comparison to the existing form and difficulties with multiple ownerships. On this basis, a higher floor space should be realistically applied to surrounding sites (such as the subject site) to accommodate future residential uplift which are directly opposite the Bankstown Metro Railway Station. Given the prime location of the site is considered that could be more capable to accommodate residential uplift.

Executive Summary

As part of the Sydney City & Southwest Project, the existing Bankstown heavy rail station will be converted to metro standards by 2024. Unlike other stations along this line, Bankstown will retain both heavy rail and metro services.

SJB have been engaged by Sydney Metro to complete Bankstown Station Precinct Masterplan to support this new infrastructure. This project has included:

1. Baseline planning review and context analysis
2. Preliminary masterplan concept testing
3. Preparation of a masterplan framework for the station precinct for the precinct

This Bankstown Station Precinct Masterplan report includes items 1&3 as outlined above.

It has been completed in collaboration with GTA Consultants (Transport) and JLL (Economics).

A number of local and state government stakeholders were included in discussions as part of a the process. These include: Sydney Metro, Sydney Trains, Sydney Metro, Greater Sydney Commission, City of Canterbury Bankstown (CSCo), Sydney Water

It builds upon the baseline review and context analysis completed in Stage 1 of this project and responds to feedback received from a range of local and state government entities. An excerpt of this review and analysis is included within this report.

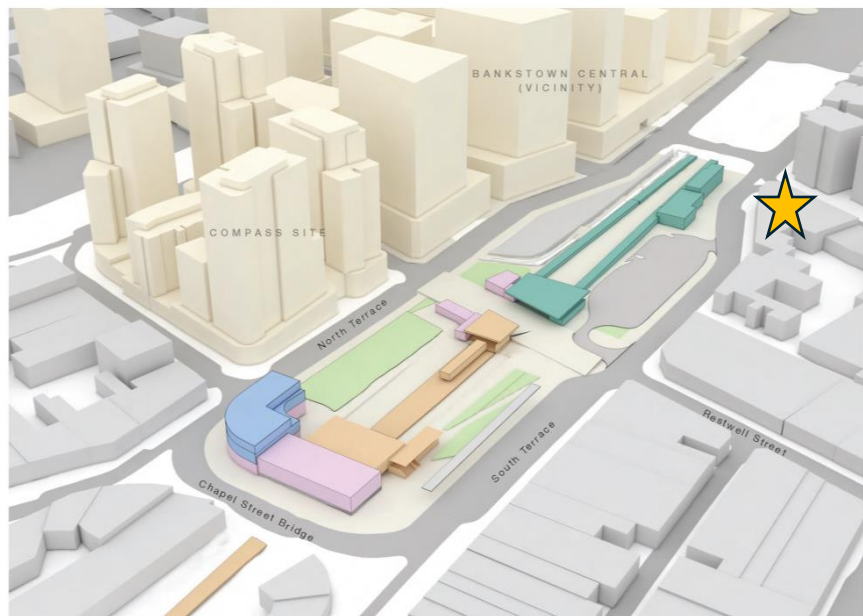


Fig 4 Metro concept masterplan indicates the uplift to the northern side of the station, however there is a significant opportunity to have similar density along South Terrace (Source: Metro concept masterplan).

Consideration for increased Height of Building

The height of building equates to approximately sixteen (16) floors and allowing for ground floor commercial/retail. The north of the site equates to about twenty-five (25) floors. It is considered that there is a significant disconnect in relation to form between both sides of the railway station. This results in a built form which is nearly double in height on one side than the other. This creates a significant disconnection in form especially when the station forms the driver of the Bankstown City Centre.

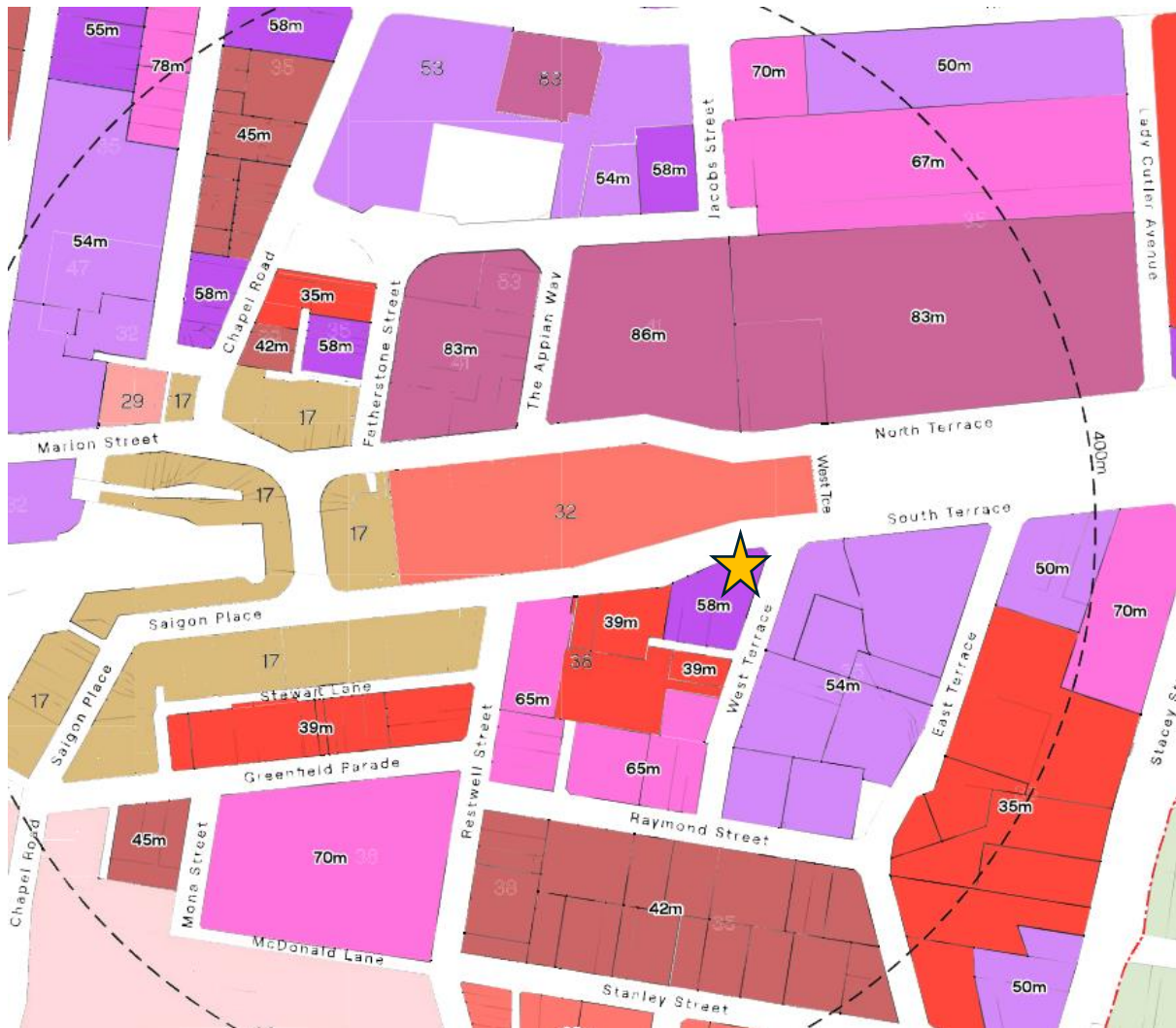


Fig 5. Extract of Height of Building Map which identifies the site at 58m (Source: Bankstown Masterplan, Canterbury Bankstown Council).

Consideration for increased Floor Space Ratio

The site is to contain a floor space ratio of 5.5:1. However given the proposed height limit of 58m. This would only result in a short building being of a height of a seven (7) storey building (i.e.) two storey podium with five levels of residential above. This results in a built form outcome which is not envisaged and is well below the height of building limit and would not present as a prominent built form in this location.



Fig. 6 Extract of Floor Space Ratio Map (Source: Bankstown City Masterplan, Canterbury-Bankstown Council).

Lack of commercial floor space demand / mandating of non-residential Floor Space Ratio

There is a significant lack of demand for commercial floor space within the Canterbury Bankstown Centre with current vacancies within the University of Western Sydney site (10,000sqm of commercial floor area is vacant), the majority of the commercial space of the Bankstown Sports Club is also vacant. The requirement for such commercial floor space is not necessary and will likely halt the economic viability of projects. It is noted that over 30,000sqm is commercial area is proposed to the north.



Bankstown's vision leverages its strategic location to create a Health and Education Innovation Precinct. Artist's impression.
Credit: Vicinity Centres

Fig 7. Extract of visualisation of Vicinity Centres project located to the north of the railway line) (Source: Vicinity Centres).

It is noted that the provision of additional floor space in this area to the south would detract from the focus of the commercial core to the north of the railway line. The further mandated requirement a high level would limit the realisation of redevelopment occurring.

Parking

It is considered that whilst the site is in close distance to public transport, there is a high demand for car spaces for residential and or commercial/retail spaces. Additional car parking beyond that prescribed within any control should not be included in floor space. Any car parking control should form a minimum car parking rate rather than a maximum.

In this regard, it is requested that the following to be considered;

- The site be increased in height to match development to the north to strengthen the city centre with a building height of 83m.
- A Higher floor space ratio of 8:1 or no floor space control (reliance upon building height control).
- Limitation of commercial to ground level to result in an active street frontage or two levels as a maximum.

Mark Raymundo

*BPlan (Hons) UNSW, MUDD UNSW,
Grad Cert (Project Management) UTS
CERT IV Real Estate Practice
Grad Dip (Heritage Conservation) USYD*Current
Principal
Maximus Developments Australia
Urban Planning and Property Development*

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 11:41:44 AM
Attachments: [barings-and-aware-real-estate-submission.pdf](#)

Submitted on Fri, 30/08/2024 - 11:37

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Costa

Last name

Dimitriadis

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 am just providing comments

Submission file

[barings-and-aware-real-estate-submission.pdf](#) (869.81 KB)

Submission

Please see attached submission prepared by Ethos Urban on behalf of Barings and Aware Real Estate in relation to the Bankstown TOD rezoning proposal.

I agree to the above statement

Yes

30 August 2024

2240170

Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure

Attention: Laura Locke (Director, Metro East and South Planning, Land Use Strategy and Housing)

Dear Laura,

Submission to the Rezoning Proposal for the Bankstown Transport-Oriented Development Precinct On behalf of Barings and Aware Real Estate

This submission has been prepared by Ethos Urban on behalf of Barings Real Estate Australia (**Barings**) and Aware Real Estate in response to the exhibition of the Department of Planning, Housing and Infrastructure's (**Department**) State-Led Rezoning for the Bankstown Transport-Oriented Development (TOD) accelerated precinct rezoning proposal. This submission has been prepared in the context of Barings' and Aware Real Estate's significant 8,175m² landholding known as the 'Compass Centre' at 83-99 North Terrace, Bankstown.

Barings and Aware Real Estate congratulate the Department in looking to further advance the densification of Sydney's key urban centre with the intent to secure a pathway for additional supply. We welcome the opportunity to comment. The joint proponents of the site are generally supportive of the intention to rezone the Bankstown City Centre as part of the TOD Program to facilitate housing near mass transport infrastructure, however **Barings and Aware Real Estate wish to make four key recommendations** to allow for the revitalisation of this key site, including the delivery of up to new 339 dwellings.

- 1. Remove the proposed affordable housing contribution for the Compass Centre site.** The affordable housing requirement should not apply to the site given the site is not provided any density uplift as part of the TOD Program. The Proposal has been significantly progressed in consultation with Council, in the absence of any affordable housing requirements. This late imposition of a new and additional contribution threatens the financial viability of the project – it would force up the cost of delivering housing which goes against the very intent of the State, which is to deliver as much new housing stock as possible. The Proposal has gone through the Design Review Panel and is ready to be lodged – any additional contributions go against the Government's short term objective to deliver new housing.
- 2. Rezone Phil Engisch Reserve from B4 Mixed Use to RE1 Public Recreation to align with the vision of the Bankstown City Centre Master Plan for Phil Engisch Reserve as continued public open space.** The Department is to be commended for applying active street frontages at the northern interface of the site with Phil Engisch Reserve, which will allow for appropriate activation at this interface. To give weight to this intent, Phil Engisch Reserve as public open space, should be rezoned as RE1 Public Recreation to match its current and future use and allow for the optimal urban design outcome, given the spatial constraints of this site.
- 3. Remove the non-residential floor space mandate that has been applied to the site.** The site is strategically located adjacent to Bankstown railway station and future metro station and is uniquely positioned for the early delivery of transformational development in this key location. However, there is a limited market for non-residential development in Bankstown, along with strong demand for residential development in light of the ongoing housing crisis. As such, the prescriptive floor space ratio (**FSR**) mandate should be removed.
- 4. Include savings provisions that retain the existing provisions in the Canterbury-Bankstown Local Environmental Plan 2023 for development applications that have progressed to lodgement prior to the rezoning proposal coming into effect.** The Compass Centre site includes a development application (DA) that has been developed in consultation with Council and Council's DRP to ensure achievement of design excellence and is ready for immediate lodgement and delivery under the existing controls. Therefore, savings provisions should be applied to maintain the existing Canterbury-Bankstown LEP 2023 provisions for DAs that are lodged prior to the commencement of the rezoning proposal.

This submission details:

- Barings and Aware Real Estate’s significant landownership of the Compass Centre site and vision for the site, which is strategically positioned adjacent to the future Metro Station (**Section 1.0**).
- Background surrounding the consultation undertaken to date with Council to develop an appropriate scheme for the site that exhibits design excellence (**Section 2.0**).
- Recommendations to inform the finalisation of the planning controls, particularly relating to affordable housing requirements, open space, non-residential FSR requirements and savings provisions (**Section 3.0**).

1.0 Barings and Aware Real Estate Landholding and Vision

1.1 Vision for the Compass Centre

Barings, in partnership with Aware Real Estate (as property investment platform of Aware Super), is seeking to contribute to the transformation of Bankstown by redeveloping the Compass Centre, making the most of its central location in the heart of Bankstown. The Bankstown CBD is currently undergoing a period of significant change and revitalisation, including the delivery of fast and reliable Sydney Metro services from Bankstown to Sydneyham by late 2025.

Aware Real Estate have embarked on a fresh approach to develop and retain ownership of much needed housing and housing diversity. Aware Real Estate will deliver a high-quality mixed-use product creating a liveable, vibrant, sustainable and accessible place. New housing will form an essential component of the Compass Centre redevelopment.

1.2 The Compass Centre site

The subject site is situated at 83-99 North Terrace, Bankstown, approximately 60m to the north of the Bankstown railway station and directly south of Paul Keating Park. The site has direct frontages to The Appian Way (east), North Terrace (south), and Fetherstone Street (west), however, does not comprise a direct street frontage to The Mall (north), given that this boundary interfaces with the former Bankstown City Library site and Phil Engisch Reserve. The site is well located within the Bankstown City Centre, which consists of key sites within a 400m walking catchment including Western Sydney University (WSU) Bankstown Campus, the contemporary Bankstown Library and Knowledge Centre, Bryan Brown Theatre and Function Centre, and Bankstown Central Shopping Centre.

Surrounded by a mix of diverse land uses, the 8,175m² site constitutes a significant private landholding within the Bankstown City Centre and is in an unrivalled position to deliver a high-quality mixed-use development that is supported by amenity, connectivity and planned infrastructure including the future Bankstown metro station. As outlined in **Figure 1**, the site holds potential as a catalyst for the future redevelopment of the city centre.

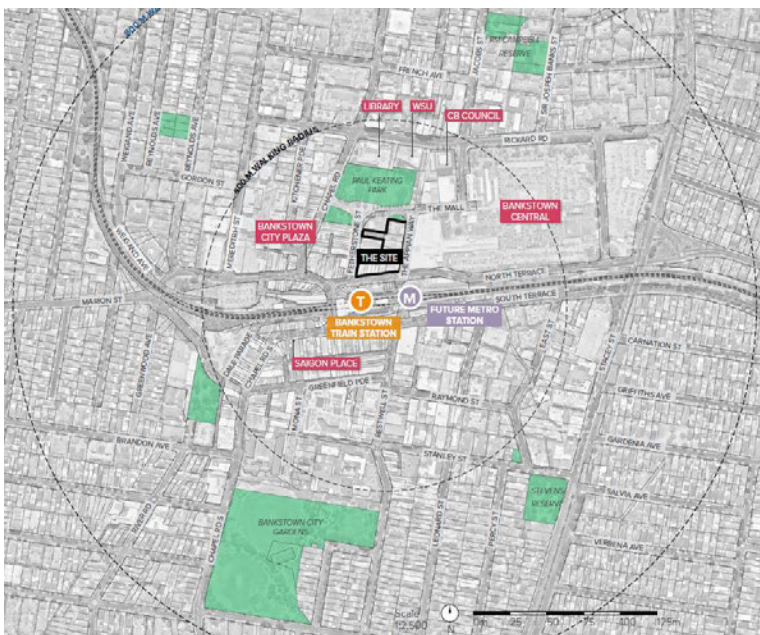


Figure 1 Site context map

Source: Hatch

2.0 Intended Redevelopment of the Compass Centre Site

The proposal for the site comprises a five (5) storey mixed-use podium, with three (3) towers above which are intended to provide approximately 339 dwellings in total. The mixed-use podium will contain ground floor retail activation and through-site links providing direct connections to and from Bankstown railway station (and future metro station), WSU Bankstown Campus, Paul Keating Park, and Bankstown Central Shopping Centre. The mixed use podium will include approximately 6,253m² of active employment generating uses informed by economic and retail studies, including a mixture of retail uses, a gym, childcare, and medical uses. Photomontages of the intended redevelopment of the site are provided at **Figure 2** and **Figure 3**.

The design principles that have underpinned the proposal include:

- Activating the ground plane and creating a thriving precinct in the heart of Bankstown City Centre through the inclusion of a mixture of uses and internal through-site links;
- Providing desirable residential accommodation, including a diversity of apartment types and mixes in a highly accessible location close to public transport and within easy walking distance to a wide range of Bankstown's amenities;
- Creation of a development that is consistent with transit-oriented development principles, to reflect the scale and density appropriate for a site within the Bankstown City Centre and in proximity to the railway station.

These principles are reflective of the strategic vision outlined in the Bankstown City Centre Master Plan and deliver on the key items described in the 'City Centre' and 'The Avenue' character areas. Such items include an articulation of massing to create a pedestrianised thoroughfare connecting the Bankstown Sports Club in the south to the Metro Station entrance, following onto the Western Sydney University Bankstown Campus in the north, with the central segment importantly including landmark towers along North Terrace. Additionally, these principles align with the intent of the Master Plan to revitalise and activate the City Centre with a high-density, complimentary retail and employment destination.

As such, the redevelopment of the site will catalyse further regeneration within the Bankstown City Centre by setting in motion a significant contribution to the pedestrian-oriented corridor imagined as Bankstown's central activity spine and 'high street'. Accordingly, this will also achieve the overarching principles of the broader TOD rezoning initiative as it will:

- Increase housing supply in well-located areas.
- Enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations.
- Deliver housing that is supported by attractive public spaces, vibrancy and community amenity.

The current proposal is a reflection of the extensive community, stakeholder and Council consultation undertaken over the last 12 months by Barings and Aware Real Estate to develop a scheme that will appropriately revitalise this key site. This has included a pre-lodgement meeting with Council staff on 26 September 2023 in addition to subsequent meetings held with Council's Design Review Panel (DRP) on 12 October 2023 and 22 February 2024. The resulting proposal has been met with positive feedback and noted by the DRP as promising '*a potential development that could set a high standard for the nature of new developments in the centre of Bankstown*'.

In addition to exhibiting design excellence, the proposal will deliver a significant quantum of housing that will contribute to the 5-year housing completion target of 14,500 additional dwellings in Canterbury-Bankstown, further to the National Housing Accord objective of 377,000 well-located homes by 2029.



Figure 2 Proposed development as viewed from North Terrace in the south

Source: PTW



Figure 3 Proposed Compass Way through-site link as viewed from the south

Source: PTW

3.0 Recommendations for Final Planning Controls

3.1 Affordable housing

The intended redevelopment of the Compass Centre is subject to the requirements set out in clause 6.16(3) of the Canterbury-Bankstown LEP 2023 which require that design excellence is achieved. The proposal has been designed in consultation with Council and through extensive consultation with Council's DRP prior to the exhibition of the rezoning proposal to ensure the achievement of design excellence. This matter, in addition to the absence of any affordable housing obligations in Council's Affordable Housing Contributions Scheme, has resulted in the proposal being developed without any affordable housing.

Considering there is no additional uplift being delivered for the site as part of the proposed controls, in conjunction with the proposal being prepared to achieve design excellence and ready for lodgement, the proposed new and sudden affordable housing contribution requirement significantly risks project feasibility. The project is already challenged with respect to feasibility in light of low gross realisation values in Bankstown, which have been compounded by the introduction of Housing and Productivity Contributions, Sydney Water development service plan (DSP) charges and the 43% increase in construction costs, all of which have come into play throughout the life of the project. Any affordable housing contribution will therefore have fatal consequences on the viability of delivering our intended transformational project on this key site in Bankstown, which will deliver substantial housing and catalyse further regeneration of the Bankstown City Centre in accordance with the objectives of the TOD Program.

Despite the lack of affordable housing provision, the proposal is strongly justified under the Greater Sydney Region Plan 'A Metropolis of Three Cities', South District Plan and the following local strategic plans:

- **Canterbury-Bankstown Local Strategic Planning Statement 2020 – Connective City 2036:** The proposal will contribute towards the target of delivering 39,350 dwellings by 2036 to house the expected 135,000 additional residents.
- **Bankstown City Centre Master Plan:** The proposal will provide north-south and east-west through-site link connections activated with an array of retail and other employment uses and supported by appropriate CPTED measures, which will galvanise Bankstown's nighttime economy in this location which is currently inactive at night.
- **Canterbury-Bankstown Housing Strategy 2020:** The proposal will deliver 339 diverse, high-quality dwellings in a Strategic Centre that is supported by sufficient infrastructure and without environmental constraint, further supporting the changing needs of households.
- **Canterbury-Bankstown Employment Lands Strategy 2020:** The proposal will include 15,788m² of non-residential uses which will significantly contribute to the target to deliver 7,880 - 15,880 jobs by 2036, or the additional 273,220m² – 550,630m² of floor space required to cater for employment floorspace demand.
- **Community Strategic Plan – CBCity 2036:** The proposal will align with the values and expectations of new development in the city centre, including an innovative design that embeds ecological sustainability, encourages further investment and promotes healthy and active lifestyle behaviours.
- **Paul Keating Park Master Plan:** The proposal responds to the Paul Keating Park Master Plan by creating a green corridor along The Mall, inverting the road hierarchy to prioritise pedestrian circulation and establishing a thoroughfare from the future metro station to the civic precinct along The Appian Way.

Further to the above, it is concerning that the Department has not exhibited the structure of the Affordable Housing Contributions Scheme, nor allowed for public comment on this component of the rezoning proposal.

Recommendation 1: Remove the proposed affordable housing requirement for the Compass Centre site. The affordable housing requirement should not apply to the site given that the proposal has advanced through the design excellence process and is now ready for lodgement. The proposed new and sudden affordable housing contribution requirement significantly risks project feasibility and risks the attainment of a key objective of the TOD program which is to facilitate significant new housing stock.

3.2 Open Space and Activation

We strongly support the Department’s proposed introduction of active street frontage requirements throughout the Bankstown City Centre, particularly along the site’s frontages, and interface with Phil English Reserve in the north-eastern corner of the site. The proposed inclusion of active street frontages along the interface with Phil English Reserve is consistent with the intended redevelopment of the site which includes activated retail uses fronting Phil English Reserve. Importantly, this is also in alignment with the vision in the Bankstown City Centre Master Plan for Phil English Reserve to be public open space (refer to **Figure 4**) and part of the ‘Civic’ character area, which includes ‘quality landscaped public spaces for gathering’, as illustrated in **Figure 5**.

Notwithstanding this, Phil English Reserve has been maintained as a B4 Mixed Use zone under the rezoning proposal. Given the spatial constraints of the reserve, is not considered appropriate for any future mixed use development and has a ‘highest and best use’ when considered in isolation, as publicly accessible open space. The provision of public open space in this location, as envisaged in the Bankstown City Centre Master Plan will provide an optimal urban design outcome when combined with the active street frontages that will be provided at the interface with Phil English Reserve. Accordingly, the proposed land use zoning map should be revised to zone Phil English Reserve as RE1 Public Recreation.

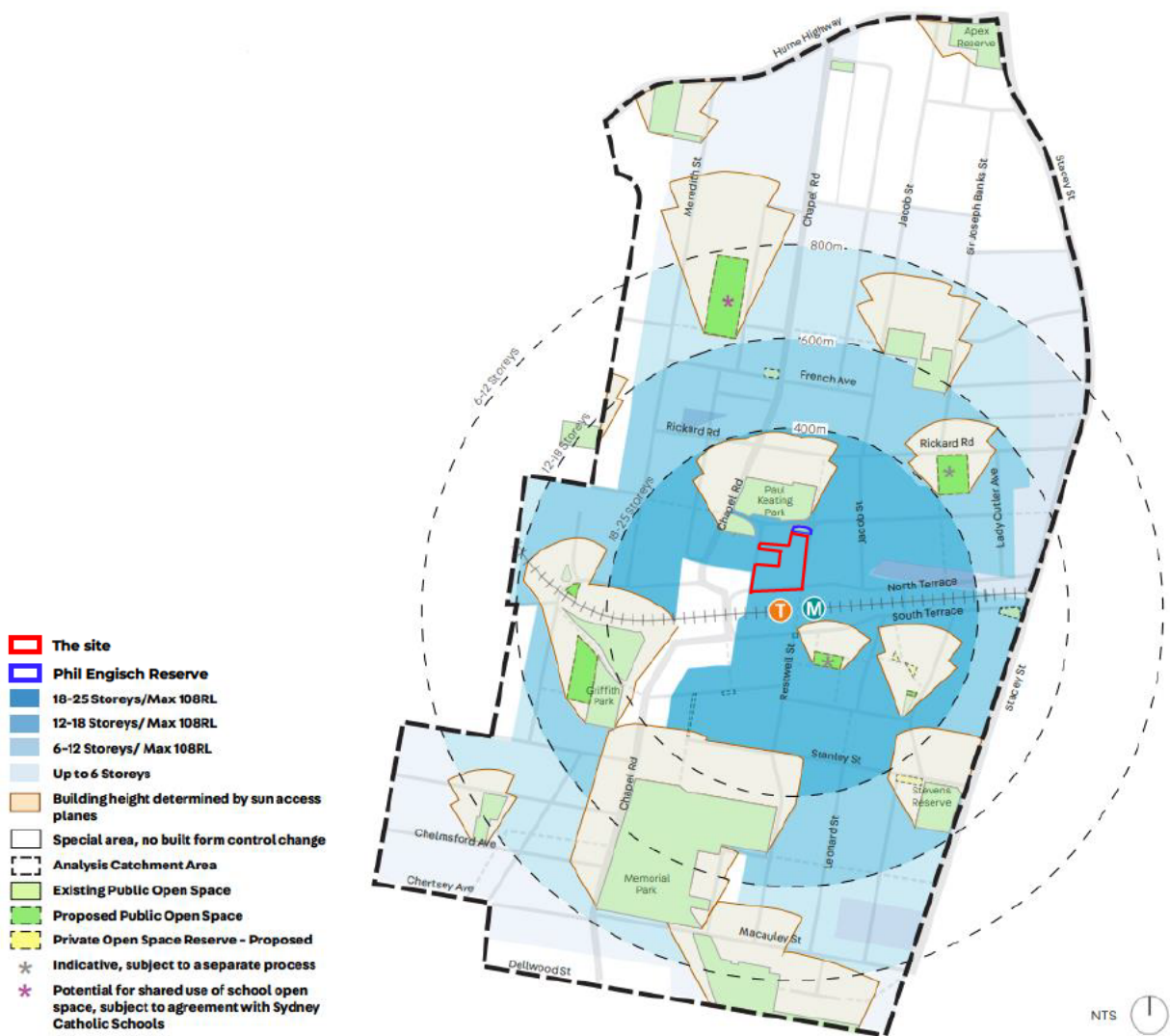


Figure 4 Vision for Phil English Reserve to be maintained as public open space

Source: Bankstown City Centre Master Plan



Figure 5 *Render of the vision for Phil Englisch Reserve*

Source: Bankstown City Centre Master Plan

Recommendation 2: Rezone Phil Englisch Reserve to RE1 Public Recreation

To enable the appropriate activation of the ground plane and public domain, as well as to develop an optimal urban design outcome surrounding the Compass Centre site, it is recommended that the Department rezone Phil Englisch Reserve to RE1 Public Recreation. This is recommended to secure the outcome of Phil Englisch Reserve remaining as continued publicly accessible open space for the Bankstown community.

3.3 Non-residential floor space

The site is strategically positioned adjacent to Bankstown railway station and the future metro station and is therefore uniquely placed for the early delivery of development that aligns with the objectives of the TOD Program. However, there is a limited market for non-residential development in Bankstown, and the ability to deliver large-consolidated components of non-residential floorspace in single development sites is not viable. Given this is the case, the proposed prescriptive approach to mandating non-residential FSR should be removed in the finalisation of the rezoning proposal to allow flexibility to prioritise housing the short term.

The Compass Centre redevelopment has been envisioned by Barings as a single stage. The redevelopment process is economically viable in this form and cannot be revisited or broken into separate future stages. Accordingly, the redevelopment needs to focus on land uses, such as market residential, which are viable to be delivered in the short term. Non-residential land uses are considered to be challenging from a viability point of view and any such floorspace mandate should be revisited at such a time when non-residential land uses are considered to have a more viable financial outlook.

Recommendation 3: Remove the non-residential floor space mandate that has been applied to the site

There is a limited market for non-residential development in Bankstown, along with a significant need for housing in alignment with the objectives of the TOD Program. Accordingly, the non-residential FSR mandate should be removed for the site to provide flexibility to deliver additional housing in proximity to mass transport infrastructure, in the form of Bankstown railway station and the future metro station.

3.4 Savings provisions

As detailed in **Section 2.0**, the intended redevelopment of the Compass Centre is a reflection of extensive community, stakeholder and Council consultation over the last 12 months to develop a scheme that will appropriately revitalise this key site. Moreover, it is ready for lodgement and has been designed with regard to Council and DRP feedback to ensure the achievement of design excellence. Therefore, the forthcoming revisions to the CBLEP 2023 should include savings provisions that maintain the existing CBLEP 2023 provisions for development applications lodged prior to the commencement of the rezoning proposal.

Recommendation 4: Include savings provisions for DAs that are lodged prior to the commencement of the rezoning proposal.

The Compass Centre site includes a DA that has been developed in consultation with Council and Council's DRP to ensure achievement of design excellence and is ready for immediate lodgement and delivery under the existing controls. Therefore, savings provisions should be applied to maintain the existing Canterbury-Bankstown LEP 2023 provisions for DAs that are lodged prior to the commencement of the rezoning proposal.

4.0 Conclusion

Barings and Aware Real Estate thank the Department for the opportunity to provide a submission in response to the exhibition of the Department's rezoning proposal for the Bankstown TOD precinct. Barings and Aware Real Estate are available to meet and discuss the contents of this submission and welcome any further opportunities to work collaboratively with the Department in contributing to the TOD finalisation. To conclude, this submission recommends the following:

Recommendation 1: Remove the proposed affordable housing requirement for the Compass Centre site. The affordable housing requirement should not apply to the site given that the proposal has advanced through the design excellence process and is now ready for lodgement. The proposed new and sudden affordable housing contribution requirement significantly risks project feasibility and risks the attainment of a key objective of the TOD program which is to facilitate significant new housing stock.

Recommendation 2: Rezone Phil Engisch Reserve to RE1 Public Recreation. To enable the appropriate activation of the ground plane and public domain, as well as to develop an optimal urban design outcome surrounding the Compass Centre site, it is recommended that the Department rezone Phil Engisch Reserve to RE1 Public Recreation. This is recommended to secure the outcome of Phil Engisch Reserve remaining as continued publicly accessible open space for the Bankstown community.

Recommendation 3: Remove the non-residential floor space mandate that has been applied to the site. There is a limited market for non-residential development in Bankstown, along with a significant need for well-located housing in light of the ongoing housing crisis. Accordingly, the non-residential FSR mandate should be removed for the site to provide flexibility to deliver additional housing in proximity to mass transport infrastructure.

Recommendation 4: Include savings provisions for DAs that are lodged prior to the commencement of the rezoning proposal. The Compass Centre site includes a DA that has been developed in consultation with Council and Council's DRP to ensure achievement of design excellence and is ready for immediate lodgement and delivery under the existing controls. Therefore, savings provisions should be applied to maintain the existing CBLEP 2023 provisions for DAs that are lodged prior to the commencement of the rezoning proposal.

Should you wish to discuss the contents of this submission, please contact the undersigned.

Yours sincerely,



Costa Dimitriadis
Senior Urbanist, Planning



Daniel Howard
Associate Director, Planning

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 12:48:44 PM
Attachments: [iveson-bankstown-tod-submission.pdf](#)

Submitted on Fri, 30/08/2024 - 12:48

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Kurt

Last name

Iveson

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

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Ashbury 2193

Please provide your view on the project

I object to it

Submission file

[iveson-bankstown-tod-submission.pdf](#) (152.39 KB)

Submission

See attached

I agree to the above statement

Yes

Dr Kurt Iveson
Professor of Urban Geography
School of Geosciences

30 August 2024

Submission re Bankstown TOD

I'm a resident of Canterbury-Bankstown, and a Professor of Urban Geography at the University of Sydney.

I object to the plan, not because it proposes more development per se, but because:

1. the mandatory requirement for only 3-10% of new housing to be affordable is way too low, and will cause displacement of low-income multicultural communities from Bankstown;
2. there need to be enforceable requirements for housing quality, and for housing diversity to ensure that there is not a mismatch between the size of homes and the size of households;
3. the increase in public open space is too small for such large population growth.

There is a genuine risk that unless the plan is significantly improved, it will actually make things worse for the people it is supposed to benefit. In doing so, it will also undermine the fragile community support for TODs across the city.

Housing affordability

The affordable housing requirement of between 3% and 10% of new housing (*Explanation of Intended Effect 2.5*) is nowhere near enough. If we end up at the lower end of this, all that development will add just 360 new affordable dwellings.

Surely by now we know that unless there are mandatory requirements for affordability, the market will not magically deliver affordable housing.¹

¹ See Gurran et al (2018) *Inquiry into increasing affordable housing supply: Evidence-based principles and strategies for Australian policy and practice*, Australian Housing and Urban Research Institute. Available at <https://www.ahuri.edu.au/sites/default/files/migration/documents/Inquiry-into-increasing-affordable-housing-supply-Evidence-based-principles-and-strategies-for-Australian-policy-and-practice-Executive-Summary.pdf>

This is especially important in Bankstown – which is currently at the more affordable end of the housing market. With a new metro coming every four minutes, and plenty of other great things to recommend the area, without a meaningful inclusionary zoning requirement for affordability, prices will inevitably be out of reach for low-income families.

As orgs like Shelter have argued, if we don't have meaningful inclusionary zoning for affordability, we'll likely end up with a reduction in the amount of affordable housing through this kind of development.²

I don't think it's an exaggeration to say that this is a recipe for mass displacement of Bankstown's existing multicultural communities.

If Paris, and Barcelona, and New York and other wealthy global cities can mandate 20-40% of new housing to be affordable and/or social housing, so can we. 15% affordable housing should be the absolute minimum we require.³

Housing Quality and Diversity

As far as I am aware, neither the current Canterbury-Bankstown LEP 2023 nor the provisions for Design Excellence that “may” be additionally implemented (Explanation of Intended Effect 2.7) consider implementing requirements for diverse dwelling sizes, to accommodate diverse household sizes including multi-generational families.

There should be housing available for larger households, including families with children and families who include elderly parents/grandparents. As Dr Nicole Cook and her team have found, existing densification processes around Liverpool have been characterized by a misalignment between apartment size and household size.⁴

² See Shelter NSW (2024) *Not all TODs are Equal*, available at <https://sheltersnsw.org.au/wp-content/uploads/2024/06/TOD-SEPP-Affordable-Housing.pdf>

³ The City of Paris has a mandatory target of 40% of all housing in the city being social housing by 2035. It has already reached 25% from a low base in the early 2000s, through a combination of inclusionary zoning, government construction, and government purchases and retrofits. Barcelona has a mandatory requirement for 30% of all dwellings in developments bigger than 600 square metres being social housing. New York City has a mandatory requirement for 20-30% of floor space in residential developments greater than 10 units being affordable in perpetuity.

⁴ Cook N et al (2023) Suburban densification: unpacking the misalignment between resident demand and investor-driven supply of multi-unit housing in Sydney, Australia, in *Australian Planner*. Available at <https://doi.org/10.1080/07293682.2023.2197604>.

I strongly support the recommendation of the authors of that study that “calibrating the share of larger apartments in Local Government Development Control Plans with consumer demand will improve housing outcomes in densifying suburbs”, and such requirements should be included in the TOD controls in Bankstown.

Public Open Space and Council Owned Facilities

It should really need to be stated – but the addition of only 2.3 ha of public open space for an extra 29000 people (as projected in the Urban Design Report, p. 15) is not adequate. The projected population growth is 279%, the projected increase in public open space is 10%.

Likewise, the addition of only one Council-owned facility to provide services to this growing community is inadequate. Both need to be significantly lifted, if we are to ensure the health and quality of life of residents in the TOD precinct.

**

In my view, the above represent the minimum improvements necessary to ensure that this TOD actually enhances affordability and quality of life, as promised. If it fails to deliver, it will be a disaster for the existing community, and it will completely undermine the legitimacy of the Government’s approach to housing via transport oriented developments. If it does take the opportunity to implement controls to deliver affordability and quality of life, on the other hand, it will build the kind of community support that might sustain a process of housing reform into the long term.

Yours sincerely,



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 1:57:00 PM

Submitted on Fri, 30/08/2024 - 13:56

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Tasha

Last name

Collins

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 express my strong objection to the Bankstown Transit-Oriented Development (TOD) rezoning proposal, primarily due to its inadequate provision for density near all the new infrastructures.

Sustainable urban growth requires a focus on density to optimise land use and reduce urban sprawl. By concentrating development around existing infrastructure, we can make more efficient use of land and resources, while preserving green spaces and natural environments. Higher density development supports the creation of walkable communities and reduces the need for extensive new infrastructure, contributing to a more sustainable urban landscape.

Furthermore, concentrating development in strategic locations helps to reduce the environmental impact associated with urban expansion. This approach aligns with sustainable development principles and supports the creation of a more resilient and eco-friendly urban environment. Lower density could lead to unchecked sprawl, increased infrastructure costs, and greater ecological impacts.

The forthcoming metro station is a key infrastructure project aimed at improving public transport and reducing traffic congestion. To fully leverage the benefits of this metro station, it is essential to increase density in the surrounding areas. Higher density will ensure that a significant portion of the population is within walking distance of the metro, thereby increasing ridership and reducing dependence on private vehicles. This shift is crucial for alleviating traffic congestion and supporting environmental sustainability goals.

Additionally, higher density around the metro station will stimulate economic activity, as businesses and retail establishments thrive in areas with higher foot traffic. This increased economic activity will contribute to the vitality of the local economy and provide greater convenience for residents. Insufficient density could result in lower metro usage and reduced economic benefits, undermining the potential positive impacts of the new transport infrastructure.

Given the current challenges in the construction industry, including rising material and labour costs, it is essential that development projects are financially feasible. Increased density around key infrastructure makes residential and commercial developments more viable by ensuring a higher return on investment. This approach helps to offset the higher costs associated with construction and supports the continued growth and development of Bankstown.

Moreover, existing walk-up apartments present constraints on further redevelopment, limiting the total housing supply. By increasing density, we can overcome these constraints and facilitate more efficient and sustainable development. This is crucial for addressing housing needs and ensuring that development projects remain feasible in the face of rising costs.

In conclusion, the Bankstown TOD rezoning proposal must be revised to incorporate higher density provisions around the newly confirmed hospital, existing shopping centres, commercial centre, and the upcoming metro station. Increased density is essential for maximising the benefits of these key infrastructure investments, addressing housing shortages, and supporting sustainable urban growth.

Regards,
Tasha Collins

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 2:05:38 PM

Submitted on Fri, 30/08/2024 - 14:05

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Dean

Last name

Hawkins

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,

The Bankstown TOD rezoning proposal, as it stands, fails to adequately address the critical need for increased density in the areas surrounding the town centre. Given the recent confirmation and, it is essential that higher density provisions be incorporated to fully leverage these investments and address the pressing issues facing our community.

The existing shopping centres and commercial centre in Bankstown are vital to the local economy, providing essential retail, dining, and service options for residents. Increasing the density in these areas is critical for boosting economic activity and ensuring the viability of local businesses. More residents living nearby will lead to higher foot traffic, which directly supports business profitability and attracts new commercial ventures. This economic stimulation is crucial for maintaining a vibrant and competitive retail

environment.

Higher density also supports the development of mixed-use projects that integrate residential and commercial spaces, creating dynamic urban areas where residents can live, work, and shop in close proximity. This integration enhances convenience for residents and fosters a more cohesive and lively community. Conversely, insufficient density may result in reduced business activity, fewer retail options, and a decline in the overall economic health of the area, impacting both businesses and residents.

Higher density development is critical for ensuring the provision of quality community services and amenities. With more residents in the area, there is a greater demand for amenities such as parks, recreational facilities, and cultural centres. This increased demand justifies investment in and enhancement of these services, improving the overall quality of life for residents. Higher density supports the development of well-maintained and accessible community facilities that contribute to a more vibrant and inclusive neighbourhood.

Moreover, well-supported community amenities foster a stronger sense of community and encourage social engagement. Public spaces and recreational facilities become focal points for community activities and interactions, enhancing social cohesion and well-being. Insufficient density may limit the availability and quality of these services, negatively impacting residents' quality of life and community engagement.

Existing walk-up apartments present significant constraints on further redevelopment, limiting the overall housing supply. These constraints hinder the ability to achieve the necessary density for effective urban development. Increasing density in areas surrounding key infrastructure will help overcome these constraints and facilitate more efficient and sustainable redevelopment.

Higher density development can also provide solutions to existing redevelopment challenges by enabling the construction of taller buildings and more intensive land use. This approach addresses the limitations imposed by current zoning regulations and supports the creation of additional housing options. Without sufficient density, the potential for redevelopment is constrained, exacerbating housing shortages and limiting overall supply.

Thank you for your attention and assistance.

Kind Regards,
Dean Hawkins

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 2:34:17 PM

Submitted on Fri, 30/08/2024 - 14:33

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

I believe that this development has not been fully thought through. On any given day the Bankstown CBD comes to a standstill during peak hour and at weekends. Having higher density homes spread out with limited transport such as the Metro, without having a solution such as having heavy rail and Metro options means the Bankstown area will be crowded, more unsafe, dirty and not a pleasant place to live if high density is allowed. Bankstown, while it does need areas to be improved wasn't meant for high density living. The proposed moving of the perfectly situated Hospital (near to Bankstown airport, and road connections such as Canterbury Road) mean that the Bankstown CBD will become more of a choke point that it already is.

There will need to be more parks, gardens and a pool in the city centre of these plans were to go ahead, because as climate change fuels more heat waves and weather events having such high density will lead to less airflow, more heat trapped and worse conditions for those living here.

For all these reasons I do not believe Bankstown can support these changes.

I agree to the above statement

Yes

Carpark, Saigon Place Public Parking, Greenfield Parade Parking, Marion Street Parking, Meredith Street Parking. I am worried because of the limited parking options provided as we already are having issues with motor vehicles being parked on footpaths or overstaying the limited time provided.

I want Bankstown to be inviting for all families. Bankstown needs more green spaces. Young Families have limited options for green spaces and we are expecting thousands of people to move into the suburb.

I want all the new builds to be built properly and never have a situation like the Mascot Towers. Dodgy buildings have been going up across Canterbury Bankstown and we deserve better than this.

I believe that a 10% of new builds should provide Public Housing. We are going into a Housing crisis and all people need to be looked after. We cannot leave anyone behind.

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 2:37:32 PM

Submitted on Fri, 30/08/2024 - 14:36

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

Punchbowl 2196

Please provide your view on the project

I am just providing comments

Submission

Canterbury Bankstown is expected to grow from 360,000 residents to over half a million by 2036 with a majority of new dwellings planned to be built in the suburb of Bankstown under Canterbury Bankstown Council and the NSW Governments agreement to Bankstown Masterplan and Transport Oriented Development Program.

With Bankstown becoming a new CBD in Metropolitan Sydney we need to prepare for many visitors who cannot access Bankstown via Public Transport as it's connectivity, compared to the rest of the city, is not as broad as suburbs such as Chatswood, Sydenham, and Strathfield. Welcoming a new University, a new hospital and new residents is fantastic, but the reality is that more people and residents of neighbouring suburbs will drive into the future CBD.

Bankstown has 6 free public parking lots, which include Bankstown Central, West Terrace

Carpark, Saigon Place Public Parking, Greenfield Parade Parking, Marion Street Parking, Meredith Street Parking. I am worried because of the limited parking options provided as we already are having issues with motor vehicles being parked on footpaths or overstaying the limited time provided.

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I believe that a 10% of new builds should provide Public Housing. We are going into a Housing crisis and all people need to be looked after. We cannot leave anyone behind.

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 2:37:48 PM

Submitted on Fri, 30/08/2024 - 14:37

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 2196

Please provide your view on the project

I am just providing comments

Submission

Canterbury Bankstown is expected to grow from 360,000 residents to over half a million by 2036 with a majority of new dwellings planned to be built in the suburb of Bankstown under Canterbury Bankstown Council and the NSW Governments agreement to Bankstown Masterplan and Transport Oriented Development Program.

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I believe that a 10% of new builds should provide Public Housing. We are going into a Housing crisis and all people need to be looked after. We cannot leave anyone behind.

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 2:41:11 PM

Submitted on Fri, 30/08/2024 - 14:40

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 2196

Please provide your view on the project

I am just providing comments

Submission

Canterbury Bankstown is expected to grow from 360,000 residents to over half a million by 2036 with a majority of new dwellings planned to be built in the suburb of Bankstown under Canterbury Bankstown Council and the NSW Governments agreement to Bankstown Masterplan and Transport Oriented Development Program.

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I want all the new builds to be built properly and never have a situation like the Mascot Towers. Dodgy buildings have been going up across Canterbury Bankstown and we deserve better than this.

I believe that a 10% of new builds should provide Public Housing. We are going into a Housing crisis and all people need to be looked after. We cannot leave anyone behind.

I work in the city and want more public transport options. I have friends that work in Parramatta and St George. They have to take more than one form of transportation to get work and it very inconvenient.

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 2:50:44 PM
Attachments: [response-to-bankstown-tod-rezoning-proposal.pdf](#)

Submitted on Fri, 30/08/2024 - 14:48

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████████

Last name

██████████

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

Yes

Info

Email

██

Suburb/Town & Postcode

Picnic Point. 2213

Please provide your view on the project

I object to it

Submission file

[response-to-bankstown-tod-rezoning-proposal.pdf](#) (26.05 KB)

Submission

Dear Sir/Madam,

Please see attached pdf file of my response to the Bankstown TOD rezoning proposal

yours faithfully

████████████████████

I agree to the above statement

Yes

██████████
Picnic Point. 2213
29th August 2024

Dear Sir/Madam,

My response to the Bankstown TOD Rezoning Proposal - Transit Oriented Development State Led Rezoning Urban Design, is listed below.

The high density design is going to be a huge strain to our limited resources.”

As there is an “Acknowledgement to the Tradition Custodians of the lands with connection to Country”. Yet this proposal is destroying the land and the natural resources, which is against how the traditional Custodians have always looked after the land. This action is not Acknowledging the Tradition Custodians, their perpetual care and connection to Country.

Environmental Impact: This new proposal will be using more energy, more pollution, less exposure to sun and nature, and more water usage for the excess residents. The Buildings will not have windows to open to let fresh air in. Air Condition will be on all the time in these extra 21,404 dwellings. In summer time there will be very high demand for electricity/power and would experience more outages. Dryers to dry the clothes, that is draining our resources, instead of clothes lines in backyards which uses the sun to dry with no power As well as excess energy usage for lifts in these proposed 25 storey buildings.

There are always plumbing problems in these high rise buildings, Pipe blockages leakages that leak to residences in floors below. This will damage the environment. Sewerage will be a very big problem. Again there will be blockages, and dangerous to health of residences. A public health issue.

Proposed Open Spaces Issues: Not much green spaces, only Paul Keating Park, Bankstown city Gardens and Graham Thomas oval/ Memorial Park for people to enjoy, with more than double the proposed population increase. Apart from these parks the rest of the proposal will be a concrete jungle with pavements in outdoor areas, with some trees, as per some of the images on page 45 of SJB/TOD report. In SJB/TOD Proposal, only 1 park, Griffith Park in Winter Solstice, have minimum of 5 hours of sun on 79% of Griffith Park. The rest of the 13 parks in Winter Solstice, have minimum of 4 and 2 hours of 50% of these parks, for the whole of the proposed increase population of 46,000, as shown on page 49 of SJB/TOD report!

Report says there will be +!% more open spaces than current 2024. Only +1% open spaces for more than double the current population in 2036!! (Current Population 17,153 in 2024. Estimate Population in 2036 46,000. Page 15 of SJB Report)

It will be horrible to go to Bankstown and see all these tall buildings, hardly see the sunshine and all the crowds.

I won't be doing any business in Bankstown with this proposal.

Whilst the proposed Memorial park upgrade looks good. This can be done with the present population to enjoy, not with 20,000 extra people as it will be crowded.

The Tree canopy in streets looks good in the images, but this can be done with the present buildings without the proposed high rise buildings. As the Tree canopy won't compensate for the increase usage of electricity to run the increased proposed high rise buildings and pollution.

High Density Issues: People living on top of one another in high density, is not good for mental health. Depressing to live in high rise. More crimes will escalate and also litter.

Building maintenance would be costly, as the building materials will age with weather, dirt and pollution, will look very unappealing. and will lose it's newly constructed clean look quickly.

With the cost of living and apartments expensive to buy, on top of that expensive strata payments, this is not a viable proposal.

People move and live in the suburbs for quieter living. If people want to live in high density places they move to the areas that have existing high density living. It is not fair to convert Bankstown into a high density area, when there are existing residents in the surrounding areas who want a suburban life and now it is being taken off them.

Parking/Transport Issues: I couldn't see any inclusion of bus routes, for connections to other suburbs. As there are buses now that come into Bankstown from southern suburbs, (eg. Sutherland, Hurstville, East Hills. Picnic Point, Revesby, Padstow (which I use to go to Bankstown) and the northern suburbs (Condell Park, Lidcombe.) There are no direct train lines to Bankstown from these suburbs. Will there be enough car parking for visiting Doctors, Specialist and for shopping? Parking and traffic will be a nightmare, with the proposed increased population, as most households have 2 or more cars. Especially trade persons who need cars, work utes to go on site where public transport is not an option.

Hospital Relocation Issues: Absolute madness to have The Bankstown Lidcombe hospital located where the present location of Bankstown TAFE is. There will be elderly people and people with disabilities that need to be driven to the Emergency department, there will be so much congestion and where to park, with limited car parking places? Traffic congestion for Ambulances, that have to fight their way through to the Emergency Department, with life and death situations. As there are 2 railway underpasses and 1 overpass to travel to the proposed Bankstown hospital, which is always congested from the southern side. And the northern side with the congested Hume highway and Stacey St.

Business Issues: Is the shopping centre going to be in one building location? As on page 96, it says "*it is currently a planning proposal and subject to further Council/NSW Government discussions.*" As this should have been considered in the proposals, as no one will know what it will be used for, and can't see how the shopping centre will be incorporated into the TOD. The existing business will suffer with the constructions. They may have to close down their business if their premises are demolished.

Heritage: With the heritage buildings how will they be incorporated with the TOD proposals, as there were no streetscape plans regarding these lovely heritage buildings, to enhance their grandeur architect design?

With the above reasons I object to the Bankstown TOD Rezoning.Proposal

Yours faithfully

██████████

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 2:55:10 PM

Submitted on Fri, 30/08/2024 - 14:54

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████

Last name

██████████

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

Yes

Info

Email

██

Suburb/Town & Postcode

Bankstown 2200

Please provide your view on the project

I am just providing comments

Submission

Canterbury Bankstown is expected to grow from 360,000 residents to over half a million by 2036 with a majority of new dwellings planned to be built in the suburb of Bankstown under Canterbury Bankstown Council and the NSW Governments agreement to Bankstown Masterplan and Transport Oriented Development Program.

With Bankstown becoming a new CBD in Metropolitan Sydney we need to prepare for many visitors who cannot access Bankstown via Public Transport as it's connectivity, compared to the rest of the city, is not as broad as suburbs such as Chatswood, Sydenham, and Strathfield. Welcoming a new University, a new hospital and new residents is fantastic, but the reality is that more people and residents of neighbouring suburbs will drive into the future CBD.

Bankstown has 6 free public parking lots, which include Bankstown Central, West Terrace Carpark, Saigon Place Public Parking, Greenfield Parade Parking, Marion Street Parking, Meredith Street Parking. I am worried because of the limited parking options provided as we already are having issues with motor vehicles being parked on footpaths or overstaying the limited time provided.

I want Bankstown to be inviting for all families. Bankstown needs more green spaces. Young Families have limited options for green spaces and we are expecting thousands of people to move into the suburb.

I want all the new builds to be built properly and never have a situation like the Mascot Towers. Dodgy buildings have been going up across Canterbury Bankstown and we deserve better than this.

I believe that a 10% of new builds should provide Public Housing. We are going into a Housing crisis and all people need to be looked after. We cannot leave anyone behind.

We need more Public transport options making Bankstown a well connected city. Workers like myself have to take 2-3 forms of public transport to get to work or to another part of the city. Bankstown is geographically in the middle of the city and we need to be a Transport hub like Strathfield and Parramatta.

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 3:02:02 PM

Submitted on Fri, 30/08/2024 - 15:01

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████████

Last name

██████████

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

Yes

Info

Email

██

Suburb/Town & Postcode

Bankstown

Please provide your view on the project

I support it

Submission

I appreciate the work that has gone into the proposing of 6 big moves to increase the liveability and growth 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: Friday, 30 August 2024 3:11:44 PM

Submitted on Fri, 30/08/2024 - 15:11

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████████

Last name

██████████

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

Yes

Info

Email

██

Suburb/Town & Postcode

2211

Please provide your view on the project

I support it

Submission

I believe we need more housing in Sydney and frankly don't care what the financial impact is on current homeowners.

I have lived here my entire life and work my ass off and can barely make rent at the end of the week. We need to restructure how our housing system works and this is a good beginning.

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 3:15:42 PM

Submitted on Fri, 30/08/2024 - 15:15

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Hubert

Last name

Chavez

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

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Yagoona

Submission

With great concern, I submit this letter to object to the Bankstown TOD Masterplan, citing several key issues that I believe will have a detrimental impact on our community.

The housing affordability crisis in Bankstown is an urgent issue that demands immediate action. Increasing density around key infrastructure is critical for addressing this challenge. Higher density development will enable the construction of more residential units, helping to meet the increasing demand for housing and stabilising property prices. This approach is essential for providing affordable housing options and alleviating the strain on the housing market.

Moreover, higher density can enhance the financial feasibility of housing projects amidst rising construction costs and labour expenses. With construction companies facing significant economic pressures, it is crucial to ensure that developments are economically viable. By increasing density, we can support the feasibility of housing projects and contribute to resolving the housing shortage more effectively.

The presence of existing walk-up apartments poses significant constraints on further redevelopment, limiting the overall housing supply. Increasing density in areas surrounding key infrastructure will help address these constraints and facilitate more efficient and sustainable redevelopment. By enabling taller buildings and more intensive land use, we can overcome current limitations and enhance the overall housing supply.

Higher density development can also address redevelopment challenges by providing solutions that maximise land use and support additional housing options. This approach is crucial for resolving housing shortages and ensuring that development projects remain feasible despite rising construction costs. Without sufficient density, the potential for redevelopment is constrained, exacerbating housing issues and limiting overall supply.

The soon-to-be-built metro station is a transformative infrastructure project designed to improve public transport accessibility and reduce traffic congestion. For this project to fulfil its objectives, it is essential to increase density in the surrounding areas. Higher density ensures that more residents are within walking distance of the metro station, which will boost public transport usage and decrease reliance on private vehicles. This shift is crucial for reducing traffic congestion and achieving environmental sustainability goals.

Additionally, higher density will contribute to the creation of a vibrant urban environment around the metro station. Increased foot traffic can stimulate local businesses, enhance retail opportunities, and support a lively community atmosphere. Without sufficient density, the metro station may not achieve its full potential, leading to underutilisation and missed economic benefits that could otherwise contribute to the local economy.

In light of the concerns raised, I strongly advocate for a revision of the Bankstown TOD masterplan. Ensuring that the plan addresses environmental, infrastructural, and community impacts will help create a more sustainable and equitable development for all stakeholders involved.

Kind Regards,
Hubert Chavez

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 3:28:24 PM

Submitted on Fri, 30/08/2024 - 15:28

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Conrad

Last name

Francis

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

As a stakeholder in the Bankstown area, I must express my strong objections to the TOD Masterplan, highlighting issues that I believe require urgent attention.

The housing affordability crisis in Bankstown is a pressing issue that requires urgent action. Increasing density in key areas is essential for addressing this challenge. By enabling the construction of more residential units, we can better meet the growing demand for housing and help stabilise property prices. Higher density development is crucial for providing affordable housing options and mitigating the pressure on the housing market.

In addition, higher density can make housing projects more financially viable amidst rising construction and labour costs. With construction companies facing increased economic pressures, it is essential to ensure that developments are feasible and economically

sustainable. Increasing density will support the financial viability of housing projects, contributing to a reduction in the housing shortage and making housing more accessible for residents.

Higher density development is essential for ensuring the provision and enhancement of community services and amenities. As the residential population grows, there is an increased demand for amenities such as parks, recreational facilities, and cultural centres. This heightened demand justifies investment in these services, improving the overall quality of life for residents and fostering a more vibrant community.

Furthermore, well-supported community amenities contribute to social cohesion and resident well-being. Public spaces and recreational facilities become central to community life, encouraging social interaction and engagement. Insufficient density may limit the availability and quality of these services, negatively affecting the community's overall experience and sense of belonging.

Higher density enables the development of mixed-use projects that integrate residential, commercial, and recreational spaces. These mixed-use developments create vibrant, multifunctional environments where residents can live, work, and access amenities with minimal travel. This integration enhances convenience and supports a more cohesive and dynamic urban experience.

Mixed-use developments also stimulate economic activity by providing commercial space within residential areas. This approach fosters a lively and interconnected community, contributing to economic vitality. Insufficient density limits the potential for such developments, resulting in a less integrated urban environment and missed opportunities for economic and social benefits.

Existing walk-up apartments in Bankstown present significant constraints on further redevelopment, limiting the overall housing supply. Increasing density in areas adjacent to key infrastructure will help overcome these constraints and facilitate more efficient and sustainable redevelopment. By enabling taller buildings and more intensive land use, we can address current limitations and enhance the overall housing supply.

Higher density development provides solutions to existing redevelopment challenges by maximising land use and supporting additional housing options. This approach is crucial for resolving housing shortages and ensuring that development projects remain feasible despite rising construction costs. Without adequate density, the potential for redevelopment is constrained, exacerbating housing issues and limiting overall supply.

To wrap up, I trust that you will take the necessary steps to address the concerns regarding the Bankstown TOD masterplan. A revised plan that considers infrastructure, environmental impacts, and community feedback will be vital for a successful and sustainable development.

Regards,



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 3:42:03 PM
Attachments: [jason-chen-submission.docx](#)

Submitted on Fri, 30/08/2024 - 15:38

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████████

Last name

██████████

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

Yes

Info

Email

██

Suburb/Town & Postcode

2200

Please provide your view on the project

I object to it

Submission file

[jason-chen-submission.docx](#) (1.47 MB)

Submission

Hello. I'm the new owner for the following properties:

32, 32A, 34 Leonard Street, Bankstown NSW 2200

I have a concerns about the proposed FSR on the right-hand side of Leonard Street (2:1). It should be at least the same as the left-hand side of Leonard Street (2.3:1).

Also, if the proposal was based on the Bankstown master plan, while in G (2:1) is correct, but J (2.5:1) and K (2.65:1) has been omitted and should be taken into consideration. See

below:

And likewise, the height increase should be the same for both sides of the street at 26m, roughly around 7 storeys high. Again, as per the Bankstown Master Plan, some part even allows up to 9 storeys high. See below:

As for the affordable housing part, the current scheme is much more flexible and reasonable at a maximum 30% bonus with 15% affordable housing component with 15 years hold. As opposed to the proposed 3-10% contribution stipulation in perpetuity, which is undemocratic and inflexible.

Thank you for your time in considering my feedback.

Sincerely,

A solid black rectangular redaction box covering the signature area.

I agree to the above statement

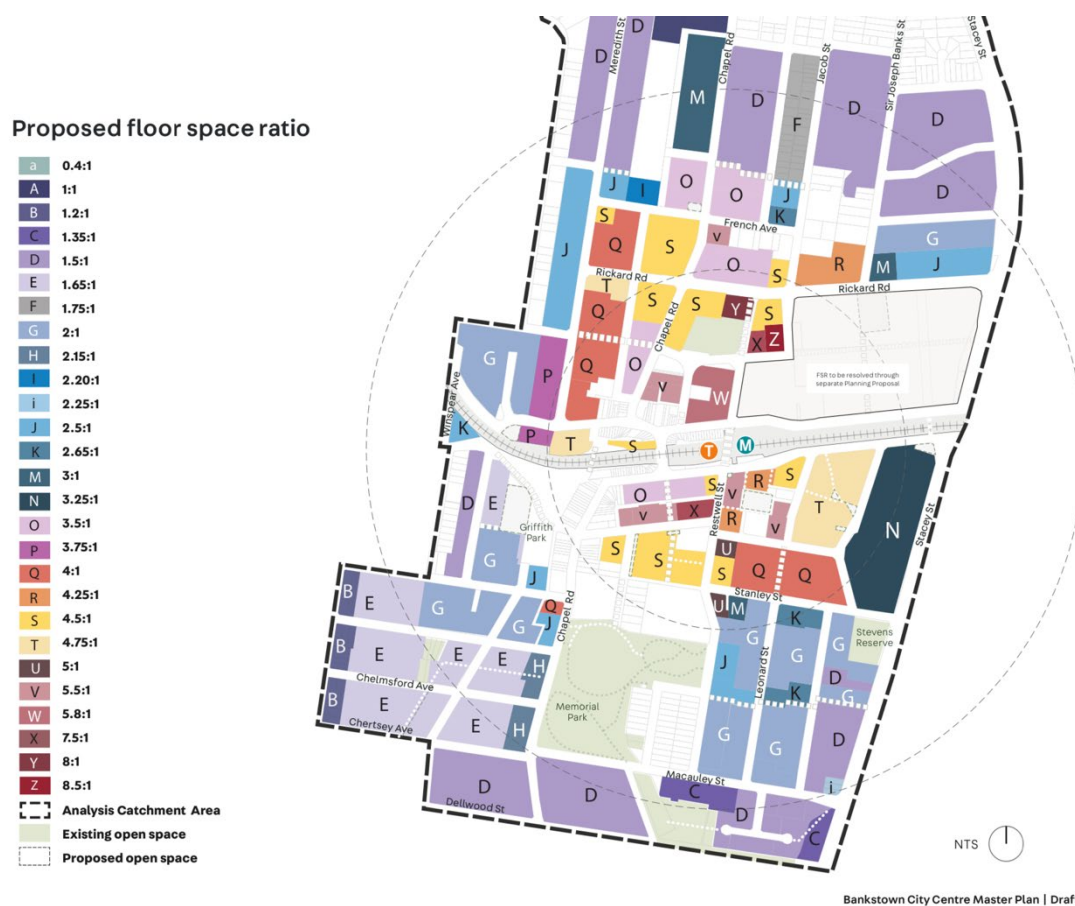
Yes

Hello. I'm the new owner for the following properties:

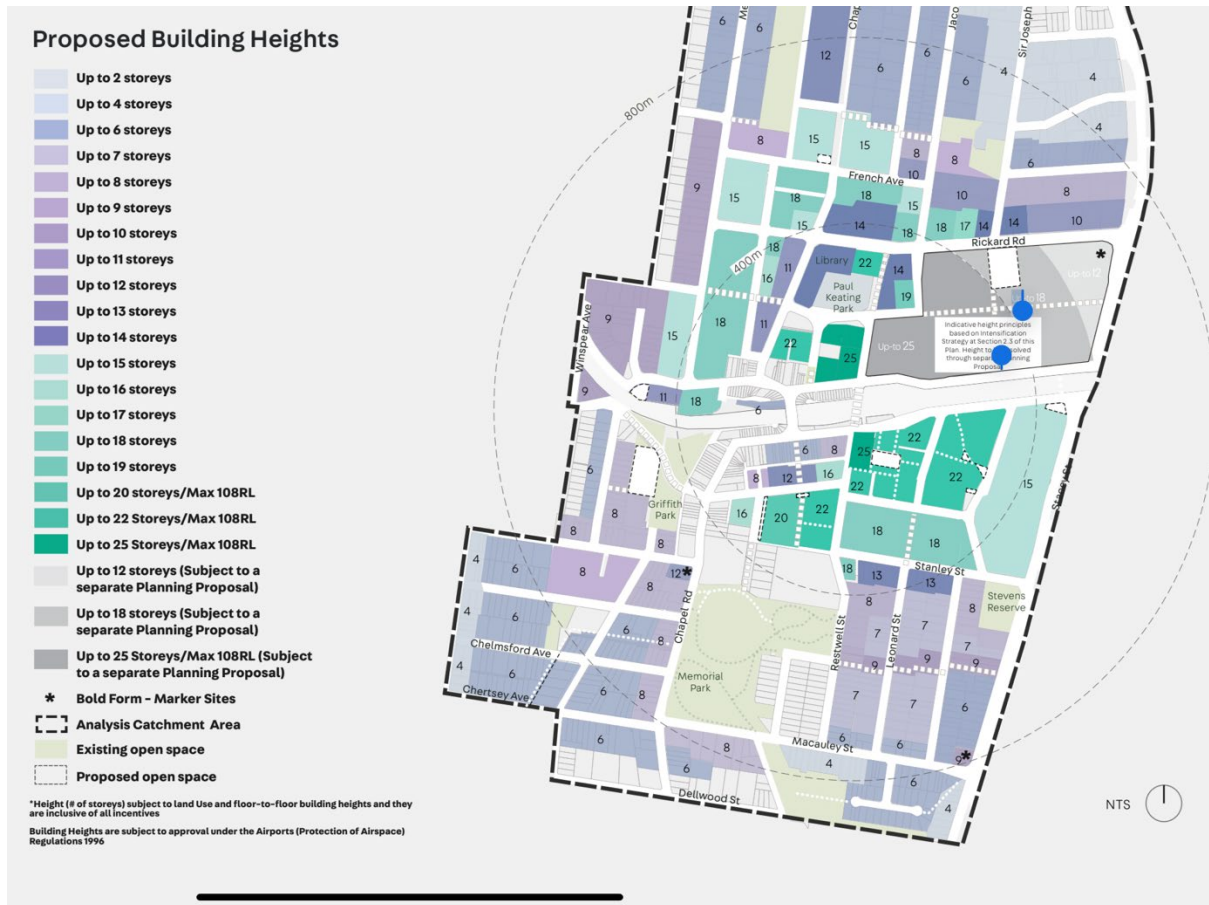
32, 32A, 34 Leonard Street, Bankstown NSW 2200

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As for the affordable housing part, the current scheme is much more flexible and reasonable at a maximum 30% bonus with 15% affordable housing component with 15 years hold. As opposed to the proposed 3-10% contribution stipulation in perpetuity, which is undemocratic and inflexible.

Thank you for your time in considering my feedback.

Sincerely,

[Redacted Signature]

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 3:42:48 PM

Submitted on Fri, 30/08/2024 - 15:42

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Maggie

Last name

Watts

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

I am writing to raise my objections to the Bankstown TOD Masterplan, citing multiple concerns that I feel have been inadequately addressed in the current proposal.

The housing affordability crisis in Bankstown is an urgent issue that demands effective solutions. Increasing density is a key strategy for addressing this crisis. By facilitating the construction of more residential units, higher density developments can help alleviate the pressure on the housing market and provide more affordable housing options. This approach is critical for stabilising property prices and making housing accessible to a broader segment of the population.

Moreover, higher density developments are essential for ensuring the financial feasibility of new housing projects. Rising costs of materials and labour have put significant strain on construction companies, making it crucial to support economically viable development

projects. Increased density will enhance the financial sustainability of housing developments, helping to mitigate the impact of escalating construction costs and ensuring that projects proceed as planned.

In addition, higher density development enables the creation of a diverse range of housing options, from affordable units to high-end apartments. This diversity is important for addressing various housing needs and preferences within the community. Without sufficient density, the housing market may remain constrained, exacerbating affordability issues and limiting the availability of suitable housing options for residents.

Existing walk-up apartments in Bankstown pose significant constraints on further redevelopment, limiting the overall housing supply. Increasing density in areas surrounding key infrastructure will help address these constraints by facilitating more efficient and sustainable redevelopment. Higher density allows for the construction of taller buildings and more intensive land use, overcoming the limitations imposed by existing low-density developments.

By enabling taller and more intensive developments, higher density supports the efficient use of land and maximises housing supply. This approach is crucial for addressing the housing shortage and ensuring that development projects remain feasible despite rising construction costs. Insufficient density limits the potential for redevelopment, exacerbating housing issues and constraining overall supply.

The forthcoming metro station is a pivotal infrastructure project designed to enhance public transportation and alleviate traffic congestion. To ensure that the metro station fulfils its role effectively, it is imperative that the surrounding area is developed with higher density. A higher residential population in the vicinity of the metro station will lead to increased usage, making the investment in public transport more viable and sustainable.

Increased density will also contribute to the creation of a vibrant, walkable urban environment around the metro station. This development will encourage the growth of retail and dining options, as well as community spaces that enhance the quality of life for residents. A thriving, pedestrian-friendly area will maximise the metro station's impact and integrate it seamlessly into daily life. Without sufficient density, the station might face underutilisation, negating the intended benefits of improved public transport and reduced vehicular traffic.

Furthermore, higher density will drive economic activity by increasing foot traffic to local businesses and fostering a dynamic urban setting. This economic boost can support job creation and local enterprise, contributing to the overall prosperity of the area. Low-density development, in contrast, may lead to a less active environment with limited business opportunities, ultimately undermining the metro station's role in revitalising the local economy.

In conclusion, I believe the Bankstown TOD masterplan requires further evaluation to address the concerns raised. Ensuring that the plan is adjusted to reflect community needs and environmental considerations will lead to a more effective and harmonious development.

Regards,
Maggie

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 3:47:03 PM

Submitted on Fri, 30/08/2024 - 15:46

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Sigmund

Last name

Mendoza

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

I would like to formally register my objections to the Bankstown TOD Masterplan, due to its proposed changes that I believe are detrimental to the local area and its residents.

Bankstown's existing shopping centres and commercial centre are crucial for local economic activity, providing essential goods and services. To support and enhance this economic activity, it is imperative to increase the density in these areas. A higher residential population nearby will drive consumer spending, which is vital for the success and sustainability of local businesses.

Higher density supports the development of mixed-use projects that combine residential and commercial spaces, creating dynamic and interconnected urban environments. This integration not only enhances convenience for residents but also stimulates local economic growth by attracting new businesses and services. Without sufficient density, the economic

vitality of the shopping and commercial centres may decline, leading to fewer retail options and diminished business opportunities.

Additionally, increasing density will enable the creation of diverse commercial offerings that cater to a range of needs and preferences. This diversity is essential for maintaining a competitive and vibrant retail environment, which can attract and retain residents. Inadequate density may limit the potential for such commercial development, resulting in a less robust local economy and fewer consumer choices.

Mixed-use developments are a key component of vibrant urban environments, combining residential, commercial, and recreational spaces in a single area. Higher density supports the creation of these developments, which offer residents the convenience of accessing a variety of services and amenities within close proximity. This integration enhances the urban experience and supports a dynamic, multifunctional environment.

Mixed-use developments also stimulate economic activity by providing commercial opportunities within residential areas. This approach fosters a lively and interconnected community, where businesses benefit from increased foot traffic and residents enjoy greater convenience. Insufficient density limits the potential for mixed-use developments, resulting in a less integrated and less vibrant urban setting.

Furthermore, mixed-use developments contribute to a more sustainable urban framework by reducing the need for extensive travel and promoting efficient land use. By integrating different uses within a single area, these developments support a more cohesive and functional urban environment. Lower density development may undermine these benefits, leading to a less efficient and less dynamic urban landscape.

The new Bankstown hospital is a landmark development with the potential to greatly enhance local healthcare. However, its benefits will be undermined if the surrounding areas are not developed with sufficient density. A higher density around the hospital site will ensure that a larger segment of the population can access its services conveniently, thereby maximising the hospital's utility and impact on community health.

Moreover, increased density will foster the establishment of additional medical facilities such as specialist clinics and allied health services in the vicinity. This will create a comprehensive health precinct, improving access to a range of healthcare services and contributing to a more integrated approach to health management. Inadequate density may result in limited support services, reducing the effectiveness and accessibility of the hospital's offerings.

Additionally, a higher population density will justify and support the expansion of the hospital's services. With more residents in close proximity, the hospital can operate at a higher capacity and offer a broader range of services, which can enhance overall health outcomes. Without sufficient density, the hospital may face operational constraints, limiting its ability to fully meet the healthcare needs of the community.

In light of the significant issues raised, I request a thorough reevaluation of the Bankstown TOD masterplan. Addressing these concerns will help create a development that is both practical and beneficial for all stakeholders.

Regards,
Sigmund Mendoza

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 3:48:58 PM

Submitted on Fri, 30/08/2024 - 15:48

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 object to it

Submission

Further Considerations need to made in terms of:

- green space; not enough public parks and third spaces for all people
- the lack of trees in the LGA. In the summer there are few trees to provide shade and the trees planted are more like shrubs, having no height to provide shade. It's important to note, it reaches up to 42 degrees, which makes going outside very difficult.
- parking; the LGA does have enough public car parks and most are time bound. IDEA: Mandating property developers to provide private parking to free up street parking
- in terms of transport oriented development, our train line only goes to the city, the expectations is to go to either, lidcombe, central or Redfern to go elsewhere. Most people don't use public transport because it's \$7 round trip. What is the point of basing development on public transport? how is the state government encouraged people to use public 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: Friday, 30 August 2024 3:53:24 PM

Submitted on Fri, 30/08/2024 - 15:52

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Cole

Last name

Greenwood

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

This letter is to formally object to the Bankstown TOD Masterplan, highlighting concerns that I believe are not adequately addressed in the current proposal.

The housing affordability crisis in Bankstown is a pressing issue that requires immediate attention. Higher density development is a critical strategy for addressing this crisis by increasing the supply of housing and stabilising property prices. This approach is essential for making housing more affordable and accessible to a wider population.

Higher density also helps ensure that housing developments remain economically viable amidst rising construction costs. With the cost of materials and labour increasing, supporting higher density projects is crucial for maintaining feasibility and addressing the housing shortage. Inadequate density may result in fewer viable projects, exacerbating the affordability crisis and limiting housing availability.

Additionally, higher density development provides a range of housing options, from affordable units to premium residences. This diversity is important for accommodating different income levels and housing needs within the community. Without sufficient density, the housing market may remain constrained, limiting options and further impacting affordability.

The housing affordability crisis in Bankstown is a pressing issue that requires immediate attention. Higher density development is a critical strategy for addressing this crisis by increasing the supply of housing and stabilising property prices. This approach is essential for making housing more affordable and accessible to a wider population.

Higher density also helps ensure that housing developments remain economically viable amidst rising construction costs. With the cost of materials and labour increasing, supporting higher density projects is crucial for maintaining feasibility and addressing the housing shortage. Inadequate density may result in fewer viable projects, exacerbating the affordability crisis and limiting housing availability.

Additionally, higher density development provides a range of housing options, from affordable units to premium residences. This diversity is important for accommodating different income levels and housing needs within the community. Without sufficient density, the housing market may remain constrained, limiting options and further impacting affordability.

Existing walk-up apartments in Bankstown present significant constraints on further redevelopment, limiting the overall housing supply. Increasing density in areas surrounding key infrastructure is essential for addressing these constraints and facilitating more efficient and sustainable redevelopment.

Higher density enables the construction of taller buildings and more intensive land use, overcoming the limitations imposed by existing low-density developments. This approach supports the efficient use of land and maximises housing supply, addressing the housing shortage and ensuring that development projects remain feasible despite rising construction costs.

Moreover, higher density development provides opportunities for addressing various housing needs through a range of residential options. This diversity is important for accommodating different demographics and preferences within the community. Without sufficient density, the potential for redevelopment is constrained, limiting housing options and impacting overall supply.

Thank you for considering these points. I look forward to your response and a revised proposal that better meets the community's needs.

Kind regards,
Cole Greenwood

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 3:55:36 PM
Attachments: [tod-submission-30.08.2024.pdf](#)

Submitted on Fri, 30/08/2024 - 15:54

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

████

Last name

████

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

Yes

Info

Email

████████████████████

Suburb/Town & Postcode

2220

Please provide your view on the project

I am just providing comments

Submission file

[tod-submission-30.08.2024.pdf](#) (832.23 KB)

Submission

Please refer to our attached submission which supports some aspects but objects to the exclusion relating to affordable housing and the Housing SEPP

I agree to the above statement

Yes

30 August 2024

Ms Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure
Via email - bankstowntod@dpie.nsw.gov.au; cc: [REDACTED]

Dear Ms Fishburn

Submission to the Bankstown TOD rezoning proposal

This submission has been prepared by St George Community Housing (SGCH) in response to the NSW Department of Planning, Housing and Infrastructure's (DPHI) exhibition of the Bankstown Transport Oriented Development (TOD) rezoning proposal.

SGCH is one of Australia's largest Tier 1 community housing providers (CHP), with a proven track record of delivering and operating social and affordable housing at scale in partnership with government and the private sector. SGCH manages over 7,000 homes, encompassing key worker, social, and affordable housing, providing a place to call home for more than 11,500 people.

This submission is made in relation to SGCH's property at 158-160 Stacey Street, Bankstown (the site). However, it also has broader policy application for all proposed TODs to ensure CHPs can continue to deliver the NSW Government's objective to tackle the housing crisis by increasing the supply of affordable housing.

158-160 Stacey Street, Bankstown

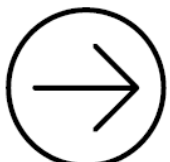
SGCH purchased the site (**Attachment 1**) in 2017 with the intention of redeveloping it for social and affordable housing under the NSW Government Social and Affordable Housing Program. The site benefitted from a Site Compatibility Certificate (SCC) issued by DPIE on 27 April 2017 which allowed for the construction of a 9-storey residential flat building comprising a maximum building height of 29.4 metres and a maximum FSR of 2.57:1 (**Attachment 1**). On this basis SGCH prepared a Development Application for 85 affordable apartments (100% of the proposed units) for submission to Canterbury Bankstown Council.

Unfortunately, we have been unable to progress an application with Council using the SCC, which has now expired. SGCH have been making representations and submissions to both Council and DPHI on the strategic planning policies that govern the site since 2017 (including the Bankstown City Centre Masterplan and proposed Local Environmental Plan (LEP) and Development Control Plan (DCP) planning controls), seeking support to retain the FSR and height allowances permitted under the SCC and develop the site for 85 affordable homes. We require the planning controls for this site to be settled so that we can seek consent for this much needed affordable housing project.

Review of the Bankstown TOD

We have undertaken a detailed review of the Bankstown City Centre Master Plan, adopted by the City of Canterbury Bankstown in 2021, and the Explanation of Intended Effect (EIE) for the Bankstown TOD rezoning proposal.

We have identified a number of outcomes we support and a number of issues that we consider warrant further consideration and amendment to achieve one of the rezoning's key objectives, which is to enable the delivery of more affordable housing, both within Bankstown and the identified TODs more generally. These issues should be reviewed prior to the finalisation of the Bankstown TOD and policies relating to the eight TODs generally.





We are supportive of the increased FSR and height controls proposed for our site for 158-160 Stacey Street, Bankstown, although the proposed FSR of 2.5:1 **is less** than the SCC FSR of 2.57:1 we secured support for in 2017 for an 85-unit affordable housing development. This would not be a concern if we were still able to apply the in-fill affordable housing bonuses under the Housing SEPP. However, the proposal is that all eight TOD areas would be excluded from these bonuses on the basis that an Affordable Housing Contribution would be levied.

Affordable and social housing is a significant public benefit to the community and is typically not the highest and best use of a site. **Incentives should be provided** to ensure affordable housing developments by CHPs are feasible in an increasingly competitive residential market, **not removed**. We therefore **object** to the proposal to exclude development within all TODs from utilising the infill affordable housing FSR and height bonuses under the Housing SEPP.

This proposal will severely limit registered Community Housing Providers (CHPs) from developing sites for affordable housing. SGCH develops its own sites to provide at least 50% and often 100% affordable housing, well in excess of current minimum requirements. In many cases these properties remain as affordable housing well beyond the minimum 15 years. We rely heavily on the infill affordable housing bonuses for project feasibility and to maximise the number of affordable homes that can be provided. The proposal to exclude the TODs from this bonus provides no development incentive for CHPs beyond what is already afforded to a private developer of market housing.

While SGCH welcomes the introduction of financial contributions to secure more affordable housing across the board (currently projected to deliver between 375–1,250 affordable homes), the same number of affordable homes could be provided by CHPs delivering 100% affordable projects across 10 sites of 125 apartments each. The point is, both options could be used simultaneously to double affordable housing targets.

Our suggestion would be that in addition to the financial contributions regime, there is an option available for Tier 1 CHPs to utilise the Housing SEPP bonus within a TOD if they are providing at least 50% affordable housing on site. By restricting this to a smaller part of the sector that focuses on long term affordable housing, the urban design changes as a result of additional height or FSR on a small number of CHP sites would be insignificant across the TODs but provide significant public benefit by enabling CHPs providing affordable housing.

Affordable Housing Contributions Scheme

SGCH would seek to be excluded from paying affordable housing contributions for its developments as a Tier 1 provider of affordable housing. This includes mixed tenure projects where market rental apartments are required to subsidise the provision of affordable/social rental apartments.

SGCH would also like to request access to the affordable housing contributions that will be levied across the TODs to provide more affordable housing within these areas in perpetuity.

If you have any questions or concerns, please contact Kim Gray, SGCH's Homes Business and Development Manager on 042710876 or kim.gray@sgch.com.au.

Yours sincerely

Andrew Brooks
Group Executive, More Homes



ATTACHMENT 1 – SITE DETAILS

The site has an area of 2,532 sq.m and is legally identified as Lot 1 in DP 1238240 (Figure 1) following the consolidation of 158 and 160 Stacey Street.

The site is currently zoned R3 Medium Density Residential under the BLEP 2015 and is vacant, following demolition of the 2 single storey detached residential dwellings on site due to squatting issues. The site adjoins Stevens Reserve to the north, the dual carriageway of Stacey Street to the east, detached dwellings to the south and detached dwellings to the west. The site is within a strategic location 600 metres southeast of Bankstown Station and the surrounding strategic centre.



Figure 1: the site (Source: SixMaps)

The site had a [Site Compatibility Certificate \(SCC\) issued under the State Environmental Planning Policy \(Affordable Rental Housing\) 2009 \(ARH SEPP\) by the Department of Planning, Infrastructure and Environment \(DPIE\)](#) on 27 April 2017 (Attachment 2).

The SCC allowed the lodgement of a Development Application for the construction of a 9-storey residential flat building comprising a maximum building height of 29.4 metres and a maximum FSR of 2.57:1.

Canterbury Bankstown Council would not accept the SCC and SGCH have not be able to lodge a development application for the redevelopment of the site for affordable housing. The SCC expired on 27 April 2022 and DPIE advised in 2022 the certificate could not be extended.



ATTACHMENT 2 – SITE COMPATIBILITY CERTIFICATE



State Environmental Planning Policy (Affordable Rental Housing) 2009 Certificate of Site Compatibility

I, the Deputy Secretary, Planning Services as delegate of the Secretary of the Department of Planning and Environment determine the application made by Urbis on behalf of St George Community Housing Sustainability Limited by issuing this certificate under clause 37(5) of the *State Environmental Planning Policy (Affordable Rental Housing) 2009*.

I certify that in my opinion:

- the development described in Schedule 1 is compatible with the surrounding land uses, having had regard to the matters specified in clause 37(6)(b); and
- the development described in Schedule 1 is not likely to have an adverse effect on the environment and does not cause any unacceptable environmental risks to the land.

Marcus Ray
Deputy Secretary
Planning Services

Delegate of the Secretary

Date certificate issued: 27/04/2017

Please note: This certificate will remain current for 5 years from the date of this certificate (clause 37(9)).

SCHEDULE 1

Site description: Lot B DP350917 and Lot 13B DP353080, 158–160 Stacey Street, Bankstown.

Local Government Area: City of Canterbury Bankstown

Project description: Construction of a 9-storey residential flat building comprising 85 residential units, of which 100% are used as affordable housing for a minimum of 25 years, and associated car parking.



SCHEDULE 2

Application made by: Urbis on behalf of St George Community Housing Sustainability Limited.

Requirements imposed on determination:

1. The final development layout and design will be subject to the consent authority being satisfied with the form, height, bulk, scale and setbacks and shall be determined through the assessment of the development application under section 79C of the *Environmental Planning and Assessment Act 1979*.
2. NSW Roads and Maritime Services are to be consulted prior to the final development layout and design, in relation to future road widening to Stacey Street and potential land acquisition.

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 3:55:43 PM

Submitted on Fri, 30/08/2024 - 15:55

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████████

Last name

██████████

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

Yes

Info

Email

██

Suburb/Town & Postcode

EPPING 2121

Please provide your view on the project

I am just providing comments

Submission

I think that the affordable housing contribution rate should be set at 10% to help address the chronic shortage of affordable housing noting that most of the new apartments will be unaffordable to purchase or rent for existing residents. overtime the 10% rate should be ramped up in annual steps to 15% the rate nominated in the TOD Program in December 2023.

There is a major concern that many low income renters will be displaced as a direct consequence of the TOD precinct redevelopments along the metro line.

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 3:56:03 PM

Submitted on Fri, 30/08/2024 - 15:55

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

garrick

Last name

horton

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 Assessment Officer

I wish to formally register my objections to the Bankstown TOD Masterplan, due to several concerns that I believe have not been fully addressed in the current proposal.

The construction of a new metro station is a significant infrastructure investment designed to alleviate traffic congestion and promote sustainable commuting. To maximise the benefits of this investment, it is vital to increase the density in the station's vicinity. Higher density ensures that more residents are within walking distance of the metro, boosting ridership and validating the investment in public transport infrastructure.

Increased density will also foster the development of a vibrant, pedestrian-friendly environment around the metro station. This environment can stimulate local businesses,

support retail and hospitality sectors, and contribute to a lively urban atmosphere. Without adequate density, the metro station may face underuse, which could undermine its effectiveness and the broader goals of reducing traffic congestion and promoting sustainable travel.

Furthermore, higher density around the metro station supports the integration of various land uses, such as residential, commercial, and recreational spaces. This integration not only enhances the functionality of the urban area but also promotes a more sustainable lifestyle by reducing the need for car travel. Insufficient density may result in continued car dependency, limiting the environmental and economic benefits of the metro station.

As Bankstown grows, the demand for community services and amenities increases. Higher density is essential for supporting the development and expansion of these services, including parks, recreational facilities, and cultural centres. A larger population base provides the necessary support for investing in and maintaining these amenities, enhancing the overall quality of life for residents.

Higher density developments often include public spaces and community facilities that foster social interaction and engagement. These amenities are crucial for building a connected and active community, offering spaces for events, activities, and recreational pursuits. Without adequate density, the provision and quality of these services may be limited, negatively impacting residents' well-being and community cohesion.

Additionally, higher density allows for a greater variety of amenities that cater to different interests and needs. This diversity enhances the attractiveness of the area and supports a more inclusive and dynamic community. Insufficient density may restrict the range of available amenities, affecting the overall functionality and appeal of the urban environment.

Mixed-use developments are a key component of modern urban planning, integrating residential, commercial, and recreational spaces within a single area. Higher density supports the creation of these developments, which offer residents the convenience of accessing various services and amenities in close proximity. This integration enhances the functionality and vibrancy of urban areas.

Mixed-use developments also stimulate economic activity by providing commercial opportunities within residential zones. This approach fosters a lively and interconnected community, where businesses benefit from increased foot traffic and residents enjoy greater convenience. Insufficient density may limit the potential for mixed-use developments, resulting in a less dynamic and less integrated urban environment.

Additionally, mixed-use developments contribute to a more sustainable urban framework by reducing the need for extensive travel and promoting efficient land use. By integrating different uses within a single area, these developments support a more cohesive and functional urban landscape. Lower density development may undermine these benefits, leading to a less efficient and less vibrant urban setting.

To close, I urge you to revisit the Bankstown TOD masterplan with the outlined concerns in mind. Making the necessary revisions will be important for ensuring a development that is both effective and supportive of our community.

Regards,
Garrick Horton

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 4:05:13 PM

Submitted on Fri, 30/08/2024 - 16:05

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Oscar

Last name

Duncan

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 wish to formally object to the Bankstown TOD masterplan, as I believe it fails to adequately address several critical issues facing our neighborhood.

The construction industry is currently experiencing significant challenges due to rising material and labour costs. To make construction projects more financially viable, it is essential to ensure that they are of sufficient scale. Higher-density developments provide the necessary economies of scale to offset these increased costs, making projects more attractive to builders and developers.

Larger, high-density projects can also attract more investment and funding, as they offer a more substantial return on investment compared to smaller-scale developments. This can help address the financial pressures facing construction companies and support the continued growth and development of the industry. By increasing density, we can create

more opportunities for builders and ensure that construction projects remain feasible and sustainable.

Additionally, higher-density developments can lead to the creation of more affordable housing options, which can help alleviate some of the pressures on the construction industry. By addressing both housing needs and construction challenges simultaneously, we can support a more balanced and resilient urban development strategy.

The housing shortage in our region is a critical issue that requires immediate and effective action. Increasing the density in the Bankstown TOD precinct can play a significant role in addressing this shortage by allowing for more housing units within the same land area. Higher-density developments can help meet the growing demand for affordable housing and prevent the negative effects of urban sprawl.

Higher-density residential projects can also make better use of existing infrastructure, reducing the strain on services and utilities. By concentrating development in well-planned areas, we can optimise the use of resources and infrastructure, leading to more sustainable and efficient urban growth. This approach is essential for tackling the housing crisis and ensuring that new developments are both feasible and beneficial.

Furthermore, increasing density can provide a range of housing options to accommodate different needs and income levels. This diversity in housing stock can help create more inclusive communities and ensure that there are affordable options available for all residents. Addressing the housing shortage through increased density can contribute to a more equitable and balanced urban environment.

Existing walk-up apartments and lower-density developments in the Bankstown TOD area currently limit the potential for further redevelopment. These constraints can hinder the overall housing supply and prevent the area from reaching its full development potential. Increasing density is essential for optimising land use and unlocking the full redevelopment potential of the site.

Higher-density development allows for a more efficient use of land, making it possible to accommodate a greater number of housing units and amenities within the same footprint. This approach can help address the housing shortage and ensure that the development is both economically and environmentally sustainable. By removing constraints on redevelopment, we can create more opportunities for growth and improvement in the area.

Additionally, increasing density can help modernise and revitalise existing areas that are currently underutilised or constrained by outdated land uses. This can lead to the creation of more vibrant and attractive neighbourhoods, contributing to the overall appeal and functionality of the Bankstown TOD precinct. Addressing these constraints through increased density is crucial for achieving a more dynamic and sustainable urban environment.

In summary, I urge you to reconsider the current Bankstown TOD Masterplan to address these concerns, ensuring that the development meets the needs of the community.

I agree to the above statement

Yes



Mr Matthew Stewart
General Manager
Canterbury-Bankstown City Council
P.O. Box 8
Bankstown NSW 1885

By email: council@cbc.city.nsw.gov.au

Dear Mr Stewart,

Request for an Interim Heritage Order (IHO)

Item: St. Paul's Anglican Church Group,
Address: 459 Chapel Road, Bankstown

This letter is to inform Council that Heritage NSW has received a request to place an Interim Heritage Order (IHO) on the above item.

Heritage NSW notes Bankstown City Council placed a local IHO on the site in 2015, to allow time to undertake assessment of its potential heritage values. Consultants Sue Rosen & Associates prepared a report identifying that it has local heritage values for the range of criteria, including historic, associative, aesthetic, social, representative and rarity values. We also understand the local IHO expired after a period of six months and Council did not progress to amend its Local Environmental Plan (LEP) to list this as a local heritage item.

I note that the amalgamated Canterbury-Bankstown City Council adopted a draft Masterplan for Bankstown in 2021 and has submitted this to the NSW Department of Planning seeking gateway determination to progress this to public exhibition.

This letter asks Council to reconsider the documents for this proposed exhibition, to ensure it includes the Sue Rosen & Associates report identifying the claimed heritage values of St. Paul's Anglican Church group, as a local heritage item.

Any community attachment to or support for local heritage listing of this item should be considered in submissions as part of any Masterplan for its wider context. This would demonstrate wholistic planning, balancing the range of issues, including heritage.

Under the *Heritage Act 1977*, the Minister can make an interim heritage order if the Minister considers that, on further investigation, the item may be found to have local significance. The Heritage Council of NSW or its delegate advises the Minister on making an order. Heritage NSW requests Council reconsiders the matter of adding this item to the Local Environmental Plan, given it clearly has a range of local heritage values.

If you have any further questions about this matter, please contact Stuart Read, Senior Heritage Officer, Heritage Programs, South, Heritage NSW, Department of Planning and Environment via email at [REDACTED] or telephone [REDACTED]

Yours sincerely

A handwritten signature in black ink, appearing to read 'Steve Meredith', written in a cursive style.

Steve Meredith
Director, Heritage Programs
Heritage NSW
Department of Planning and Environment
11 July 2022

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 4:08:59 PM

Submitted on Fri, 30/08/2024 - 16:08

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Richard

Last name

Watson

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

Attention DPHI Bankstown Team,

I am deeply troubled by the proposed Bankstown TOD masterplan and feel compelled to voice my objections regarding its implementation.

The commercial centre in Bankstown is a critical component of the local economy, providing essential services and employment opportunities. To ensure that this centre remains competitive and continues to thrive, it is vital to increase the surrounding area's density. Higher density will attract more residents who can support local businesses and services, thereby enhancing the commercial centre's economic performance and sustainability.

With increased density, the commercial centre can support a broader range of businesses,

from retail and dining to professional services and entertainment. This diversification can make the centre more appealing to both residents and investors, fostering a more vibrant and engaging environment. Additionally, the increased economic activity resulting from higher density will help sustain and create jobs, contributing to the overall economic health of the area.

Higher density can also facilitate the development of business hubs and office spaces within the commercial centre. This can encourage the establishment of new enterprises and attract businesses seeking proximity to a substantial residential population. By fostering a more dynamic and integrated commercial environment, higher density can enhance the overall functionality and appeal of the commercial centre.

Increased density facilitates the development of mixed-use projects that combine residential, commercial, and recreational spaces. This type of development promotes a more integrated and dynamic community where residents have convenient access to a variety of services and amenities. Higher density is essential for supporting these types of projects and creating vibrant, walkable neighbourhoods.

Mixed-use developments also contribute to more efficient land use by combining different functions within the same building or area. This approach reduces the need for extensive land acquisition and minimises the environmental impact of development. By promoting mixed-use development through higher density, we can align with sustainable urban planning principles and create more resilient communities.

Moreover, mixed-use developments enhance the overall quality of life for residents by providing diverse living, working, and recreational options in close proximity. This can lead to a more engaging and satisfying urban experience, making the area more attractive to potential residents and businesses. Higher density is a key enabler of this comprehensive urban design strategy.

Major public investments, such as the new hospital and metro station, require complementary residential and commercial development to fully realise their benefits. Higher density around these infrastructure projects can ensure that they are effectively utilised and supported by a sufficient population base. This alignment is crucial for maximising the return on public investment and ensuring that the benefits are widely distributed.

Increased density can enhance the effectiveness of these infrastructure investments by providing a larger and more diverse user base. This can lead to greater utilisation of public services and facilities, improving their overall efficiency and impact. By integrating higher density with infrastructure projects, we can create more vibrant and functional urban areas.

Furthermore, supporting infrastructure investments with higher density development can attract additional public and private investment. This can lead to further improvements in infrastructure and services, creating a positive feedback loop that enhances the overall quality and sustainability of the urban environment.

Given the significant issues highlighted, I respectfully request a thorough review of the Bankstown TOD Masterplan to incorporate more community feedback and mitigate the negative impacts from insufficient development.

Kind Regards,
Richard Watson

I agree to the above statement

Yes

From: [Costa Dimitriadis](#)
To: [DPE Bankstown TOD Mailbox](#); [Kris Walsh](#)
Subject: Vicinity Centres" Submission in Relation to Bankstown TOD Rezoning Proposal
Date: Friday, 30 August 2024 4:09:34 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[Vicinity Centres Submission to Bankstown TOD Rezoning.pdf](#)

Hi DPHI Team,

Please see attached Vicinity Centres' Submission in relation to the Bankstown TOD Rezoning Proposal along with associated appendices provided at the link below.

[Vicinity Centres Submission in relation to Bankstown TOD Rezoning Proposal](#)

Vicinity is available to meet and discuss the TOD Program, the contents of this submission and the Department's considerations in the forthcoming planning legislation.

Kind regards,

Costa Dimitriadis

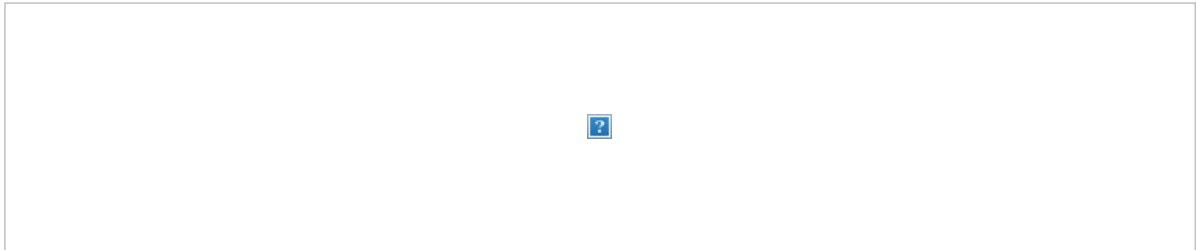
Senior Urbanist
Planning



M. 0424 445 345
W. ethosurban.com



Level 4, 180 George St
Sydney NSW 2000
(Gadigal Land)



Ethos Urban acknowledges Traditional Owners of Country throughout Australia and recognises the continuing connection to lands, waters, and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures; and to Elders past and present.

We pledge our support to the Uluru Statement from the Heart and embrace the call to walk with the Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

This email is confidential and may contain information that is confidential and privileged. If you are not the intended recipient, please notify us by return email or phone, and delete the original message.

BANKSTOWN

Submission to
Bankstown TOD Rezoning

30 August 2024

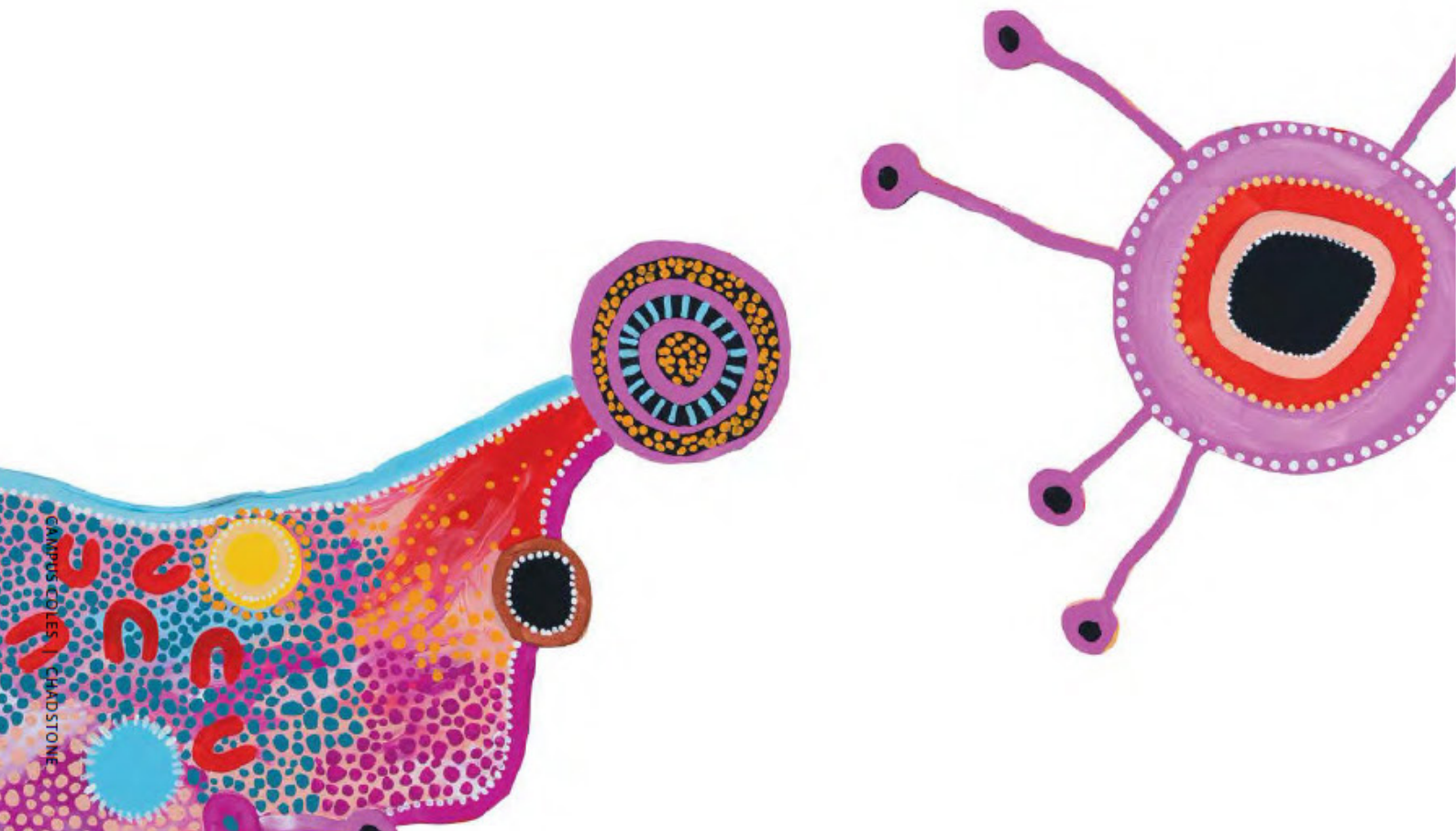


ACKNOWLEDGEMENT OF COUNTRY

Vicinity acknowledges the Traditional Custodians of Country throughout Australia and their connections to the land, sea and sky.

We pay our respects to their Elders past and present and recognise the millennia of kinship and community that remains strong today.

Bankstown stands on the traditional lands of the Darug (Darag, Dharug, Daruk and Dharuk) and Eora Peoples whose deep history of Country we respect.



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Appendices

Appendix	Author
A. Urban Design Study for Phase 1 (Indicative Stages 1 and 2 in the Draft Development Control Plan) of Bankstown Central	<i>Woods Bagot</i>
B. Independent Market and Economic Advice in relation to Employment Generating Floorspace and Bankstown Central	<i>AEC Group (on behalf of the City of Canterbury-Bankstown Council)</i>
C. Overshadowing Analysis relating to the Stacey Street Precinct	<i>FJC</i>

Executive summary

This submission has been prepared by Vicinity Centres in response to the exhibition of the Explanation of Intended Effect for the Bankstown Transport Oriented Development Precinct rezoning proposal which the NSW Department of Planning, Housing and Infrastructure has placed on public exhibition until 30 August 2024. Vicinity has commissioned the preparation of this submission in the context of its significant 11.4 hectare landholding, 'Bankstown Central', situated at 1 and 1A North Terrace (the site) which constitutes the largest single private landholding in the Bankstown City Centre.

Vicinity is supportive of the TOD rezoning intent and objectives to facilitate housing near mass transit infrastructure and is uniquely positioned to deliver upon these given it controls one of the largest landholdings within all of the TOD precincts, which is also on the doorstep of Bankstown railway station and Metro station.

While Vicinity is supportive it is critical of the proposed requirement for the mandated delivery of non-residential floor space (Employment Generating Floorspace **EGF**) as that will sterilise investment and will continue to prevent any new development and supply of new housing stock for the entire development, particularly for the first two stages of the Town Centre Precinct and Bankstown Exchange. This is a consequence of the structural changes to the office market globally and the inability to attract funding, or tenants, for major office developments, particularly in a market like Bankstown that may never have the critical mass or inherent features to compete against established existing office markets which are struggling to attract tenants and investment.

The Department will be aware of Council's independent AEC Group report supported by Vicinity's three-year marketing campaign for its DA approved Bankstown Exchange office development which has seen no office pre-commitments and the 175m² of absorption of office space across Bankstown in the last 12 months are all evidence of a fundamental lack of employment generating floorspace demand in the Bankstown CBD.

Vicinity has been working with an experienced build-to-rent developer and a Tier 1 community housing provider to ensure it can deliver a feasible first stage of development within the accelerated timeframes contemplated by the TOD Program within the Town Centre Precinct and Bankstown Exchange site (**Phase 1**). These are the two parts of the site that Vicinity has progressively worked towards ensuring are unencumbered by existing shopping centre constraints.

It is important to also note that 91,090m² of the existing EGF from the Bankstown Central Shopping Centre will be preserved, equating to 0.8:1 non-residential floor space over the entire site. However, in order to unlock the remaining development GFA on the site and deliver much needed housing and other uses over time, development needs to occur on the balance of the site, generally around the perimeter of the retained shopping centre.

The previous Voluntary Planning Agreement no longer applies to the site and is no longer applicable given the TOD rezoning changes however Vicinity appreciates the importance of providing community infrastructure with significant planning changes and so, while the VPA is no longer relevant, we have ensured to provide significant community benefit in our response. For example, Vicinity's plans for redevelopment in Phase 1 could deliver the following significant public benefits and contributions:

- Approximately 1,200 homes and 109,499m² of residential GFA, including an affordable housing contribution of at least of 3% for the first phase. Vicinity will seek to exceed this minimum affordable housing commitment subject to economic viability and funding arrangements with the preferred Community Housing Provider. However, providing it in perpetuity presents funding complications which are addressed later in this submission.
- A well-designed, managed and activated ground plane with multiple employment generating uses (13,198m²) and 10,645m² of public open space, enhancing connectivity to, and optimising use of, the transport infrastructure of trains, metro and buses within the Bankstown City Centre.
- Land dedication to enable new bus stops and connections within the site as part of an extension of Jacobs Street. This connection will help facilitate Council's vision of transforming 'The Avenue' character area into the main north-south thoroughfare by relocating buses through this Jacobs Street extension in line with design co-ordination to date between Transport for NSW, Council and Vicinity.

However, it is imperative that the following changes are made to the exhibited rezoning proposal to enable the abovementioned public benefits and contributions to be delivered:

- **Imperative 1:** Mandated non-residential floor space ratio (FSR) requirements are to be removed from the Phase 1 development, however an overall minimum of 0.8:1 non-residential FSR will be delivered on average across the broader site. Remove the requirement under clause 6.14 of the Canterbury-Bankstown LEP 2023 for the inclusion of first floor non-residential uses.

- **Imperative 2:** Remove nominated FSRs for the site and replace with a singular gross floor area (GFA) standard over the entire site.
- **Imperative 3:** Increase the maximum building height applicable to the Bankstown Exchange site to 83m (RL 108m).
- **Imperative 4:** Include existing and proposed development on the site as part of the subterranean floor space exclusion clause.
- **Imperative 5:** Increase the maximum building height permitted in the Stacey Street Precinct to 65m.

If the abovementioned imperatives are delivered, this will unlock the intended Phase 1 development, being the only parts of the site capable of early delivery in line with the accelerated timeframes contemplated by the TOD Program. The Phase 1 development will comprise approximately 1,200 residences across the two parts of the site that are most proximate to Bankstown railway station and future metro station, inclusive of considerable affordable housing and ground level active uses, thereby directly aligning with the TOD objectives. These benefits in addition to the provision of the crucial Jacobs Street extension will help to galvanise the Bankstown City Centre and catalyse the ongoing regeneration of this strategic centre in line with the objectives of the TOD Program.

1.0 Introduction

This submission has been prepared by Vicinity Centres (Vicinity) in response to the exhibition of the Explanation of Intended Effect (**EIE**) for the Bankstown Transport Oriented Development (**TOD**) Precinct rezoning proposal (rezoning proposal) which the NSW Department of Planning, Housing and Infrastructure (**Department**) has placed on public exhibition until 30 August 2024. Vicinity has prepared this submission in the context of its significant 11.4 hectare landholding, 'Bankstown Central', situated at 1 and 1A North Terrace (the site) which constitutes the largest single private landholding in the Bankstown City Centre.

Vicinity is supportive of the TOD rezoning intent and objectives to facilitate housing near mass transit infrastructure and is uniquely positioned to deliver upon these given it controls one of the largest landholdings within all of the TOD precincts, which is also on the doorstep of Bankstown railway station and Metro station.

However, within the context of Vicinity's planned significant investment in the Bankstown City Centre, Vicinity remains concerned that the proposed planning controls with regard to non-residential FSR requirements is at odds with current market conditions and the State government's own TOD objectives. Consequently, this will significantly sterilise any investment into much needed housing. As a result, Vicinity is seeking a more flexible approach that will generate housing outcomes in the shorter term and preserve opportunity to deliver on non-residential uses when the market conditions improve.

Vicinity has been working with an experienced build-to-rent (**BtR**) developer and a Tier 1 Community Housing Provider (**CHP**) to ensure it can deliver a feasible first stage of development within the accelerated timeframes contemplated by the TOD Program. Defined as the Town Centre and Bankstown Exchange precincts (**Phase 1**), these are the two sites that Vicinity has progressively worked towards ensuring are unencumbered and are shovel ready for development.

Both sites are the most proximate to the rail infrastructure and will deliver the following much needed housing, public benefits and contributions. The intended development in Phase 1 of the site is capable of early delivery and meets the TOD objectives as it:

- Increases housing supply in well-located areas, directly adjacent to the metro station.
- Enables a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations
- Delivers housing that is supported by attractive public spaces, vibrancy, and community amenity.
- Increases the amount of affordable housing in Bankstown City Centre, including a significant contribution of affordable housing within a short period.

To enable the delivery of the intended Phase 1 of development in alignment with the TOD objectives the following report will provide an overview of the imperative changes required to the draft planning legislation.

2.0 Vicinity's ownership of Bankstown Central

The subject site is situated at 1-1A North Terrace, Bankstown and constitutes the largest single private landholding in the Bankstown City Centre. An aerial image of the site which identifies its location in relation to the remainder of the Bankstown City Centre is provided in **Figure 1**. Given that it constitutes the largest single private landholding in the Bankstown CBD at 11.4 hectares, the site is uniquely positioned to facilitate substantial redevelopment and housing delivery in the immediate term, and act as a catalyst for further regeneration within the Bankstown City Centre immediately adjacent to the future Metro station which is set to open in late 2025. The different precincts constituting the site are demarcated in **Figure 2**, with the Phase 1 development site highlighted in purple.



Figure 1 Aerial image of the site

Source: Department of Planning, Housing and Infrastructure

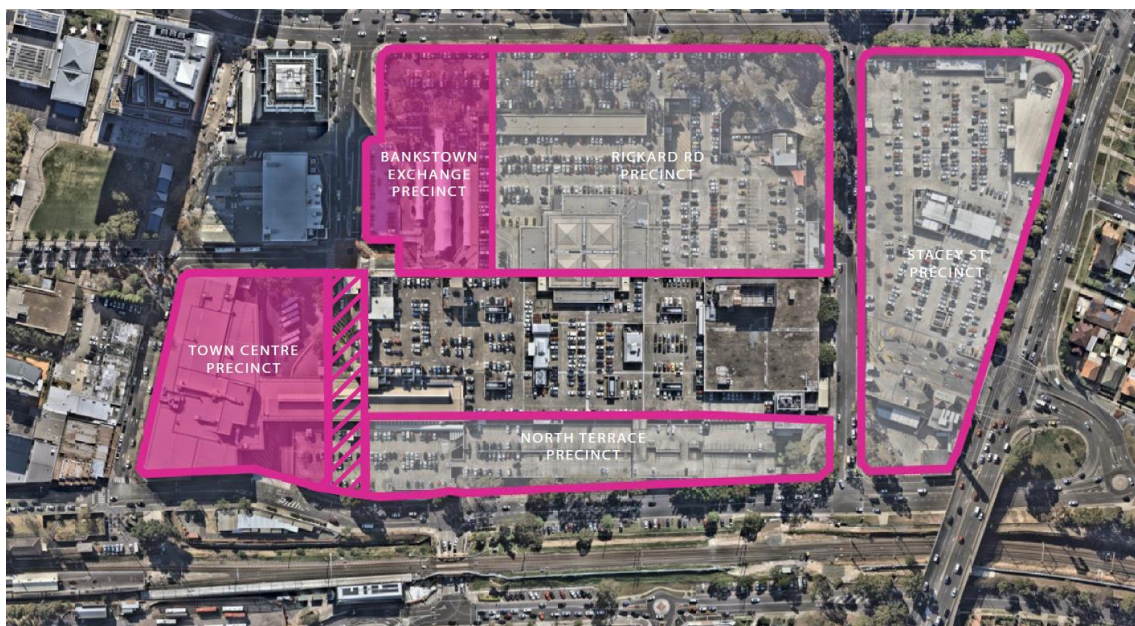


Figure 2 Proposed Phase 1 development site on Town Centre Precinct and Bankstown Exchange

Source: Woods Bagot

3.0 Background

3.1 Bankstown Central Shopping Centre Planning Proposal

3.1.1 Scope of the planning proposal

The site has been subject to a previous Planning Proposal (PP-2022-1898) which received a Gateway Determination on 28 October 2022 and following the resolution of gateway conditions was placed on public exhibition on 26 July 2023 until September 2023.

The Planning Proposal included the following scope:

- Increase the maximum permissible height from 41m up to 86m.
- Apply a new maximum Floor Space Ratio ranging from 3:1 to 7:1.
- Amend Clause 6.14 'Restrictions on development in Zone B4 Mixed Use' to enable residential development at ground level and above within certain parts of the site along Rickard Road, .
- Include provisions requiring a minimum 50% employment generating floor space in the Town Centre Precinct and 40% across the whole site
- Draft amendments to the Canterbury-Bankstown Development Control Plan 2023 through a site-specific DCP including controls relating to built form, landscaping, solar access, setbacks, through site links and open space design requirements.

It is noted that this previous Planning Proposal involved a six year process prior to the inclusion of the site into the TOD rezoning proposal and incurred a total cost of over \$8 million for Vicinity without a final outcome.

3.1.2 Changed market conditions and unfeasibility of non-residential floor space

As part of the Planning Proposal, there was a long-held ambition by various parties to deliver employment generating floor space (**EGF**) mandates, however significant market headwinds, in particular the severe downturn of office demand, have made this unfeasible and has sterilised investment into this asset class. In this regard, based on concerns from Vicinity on the **EGF** requirements imposed on the site by Council, Council commissioned the preparation of an office market analysis focussing on the amount of EGF that is able to be delivered as part of the Bankstown Central site. This analysis prepared by AEC Group included at **Appendix B** found that there is insufficient demand to secure pre-commitments for any significant commercial development let alone for the amount of mandated EGF. This is discussed further in **Section 5.1**.

The EGF requirements introduced by Council during the negotiation of the Bankstown Central Shopping Centre Planning Proposal were ultimately obstructive to the progression and finalisation of the Planning Proposal given the lack of demand for such floor space.

The insufficient demand for non-residential floor space is further evidenced by Vicinity's three year Bankstown Exchange marketing campaign since DA approval which has led to no tenant pre-lease commitments. In addition, the 10,500m² of vacant commercial and education floor space in the WSU Bankstown Campus and approximately 3,200m² of vacant commercial floor space remaining in the Flinders Centre with minimal absorption of only 175m² of office space across both buildings in the last 12 months.

Accordingly, the non-residential floor space requirements associated with the TOD rezoning proposal will need to be removed to enable any delivery of residential development on the site in the short to medium term, which will include a significant quantum of housing and affordable housing. This is detailed in **Section 5.1**.

In respect of employment generation within the Bankstown CBD we note the recent announcement of the development of new health and hospital facilities within the CBD. This employment generating space helps meet Council's objectives for jobs in the CBD but concurrently raises the question of housing locally for those who will work in, and service, those facilities. In this respect more housing in Bankstown must be the key objective for the TOD and, as noted, Vicinity's site is perfectly positioned to deliver that outcome provided it is unencumbered by EGF constraints.

3.1.3 Jacobs Street Extension

As indicated in the EIE by DPHI, Vicinity has been working with Council and Transport for NSW (TfNSW) to work through how the Jacobs Street extension land dedication will fit within a future Bus Interchange for the Bankstown CBD. This process is well progressed, however due to confidentiality provisions we are unable to disclose specific details of the remaining issue(s) to close out that process without permission from Council and TfNSW.

Subject to this permission, we would welcome the opportunity to outline the remaining issues to the Department and finalise an agreed position between the parties.

The Jacobs Street extension land dedication is a critical element of the future Bus Interchange as contemplated by the Complete Streets vision and the ability to deliver this land dedication as part of the development of the Town Centre Precinct is critical in seeing this vision become a reality.

It is suggested that part of the \$520 million funding from the Housing and Productivity Fund allocated to TOD precincts is used to fund the delivery of the new Bus Interchange once the Jacobs Street Extension land is able to be dedicated through the development of the Town Centre Precinct.

4.0 Contributions and public benefits

4.1 Previous Voluntary Planning Agreement

Previously there had been negotiations for the preparation of a Voluntary Planning Agreement (**VPA**) tied to the Bankstown Central Shopping Centre Planning Proposal which were inconclusive. Vicinity acknowledge that Council's draft submission in relation to the TOD rezoning proposal sets out that the proposed terms of the draft VPA are no longer valid as it does not apply to a Planning Proposal. Council have requested that the VPA components continue to apply to the site. Vicinity believe the terms should not be applied to the site as the planning and TOD precinct context has changed significantly, noting that affordable housing is now required to be provided pursuant to the EIE provisions. This was not the case when the previous Draft VPA was put forward with the planning proposal.

Importantly, the draft VPA was largely predicated on a commercial scheme with the inclusion of a greater proportion of non-residential floor space. The context has significantly changed in the current market in which there is insufficient demand for non-residential floor space, evidenced by the AEC Group study, as detailed in **Section 3.1.2** above and in **Section 5.1**. Further, affordable housing requirements have been imposed on the site, which were not applicable in the previous planning proposal. Therefore, the significant contribution associated with the delivery of 3% affordable housing across development on the site warrants an alternative approach to the proposed contributions and public benefits, which is detailed in **Section 4.2**.

4.2 Proposed contributions and public benefits

In light of the significant difference in the TOD rezoning proposal which requires the delivery of affordable housing, Vicinity is committed to providing the following contributions and public benefits:

- Minimum 3% affordable housing across the site and Vicinity will target a higher percentage in the Phase 1 development subject to economic viability, resolution of the concept of in perpetuity and funding arrangements with our nominated CHP. Further detail relating to the affordable housing approach is provided in **Section 4.2.1**.
- A well-designed, managed and activated ground plane with multiple uses and 10,645m² of public open space, enhancing connectivity to and optimising use of the transport infrastructure of trains, metro and buses within the Bankstown City Centre (refer to **Figure 2** below). This is detailed further in the Urban Design Study prepared by Woods Bagot included at **Appendix A**.
- Dedicated land to enable new bus stops and connections through the site as part of an extension of Jacobs Street. This connection will help facilitate Council's vision of transforming 'The Avenue' character area into the main north-south thoroughfare by relocating buses through this Jacobs Street extension. The extension is shown in **Figure 3**, referenced as 'new street'.

In order to successfully deliver on the abovementioned contributions and public benefits, the following recommended changes to the planning controls will be required, the details of which are outlined in the balance of this report:

- Mandated non-residential floor space ratio (FSR) requirements are to be removed from the Phase 1 development, however an overall minimum of 0.8:1 non-residential FSR will be delivered on average across the broader site. Remove the requirement under clause 6.14 of the Canterbury-Bankstown LEP 2023 for the inclusion of first floor non-residential uses.
- Remove nominated FSRs for the site and replace with a gross floor area (GFA) limit over the entire site of 447,523m².
- Increase the maximum building height applicable to the Bankstown Exchange site to 83m (RL 108m).
- Include existing and proposed development on the site as part of the subterranean floor space exclusion clause.
- Increase the maximum building height permitted in the Stacey Street Precinct to 65m.

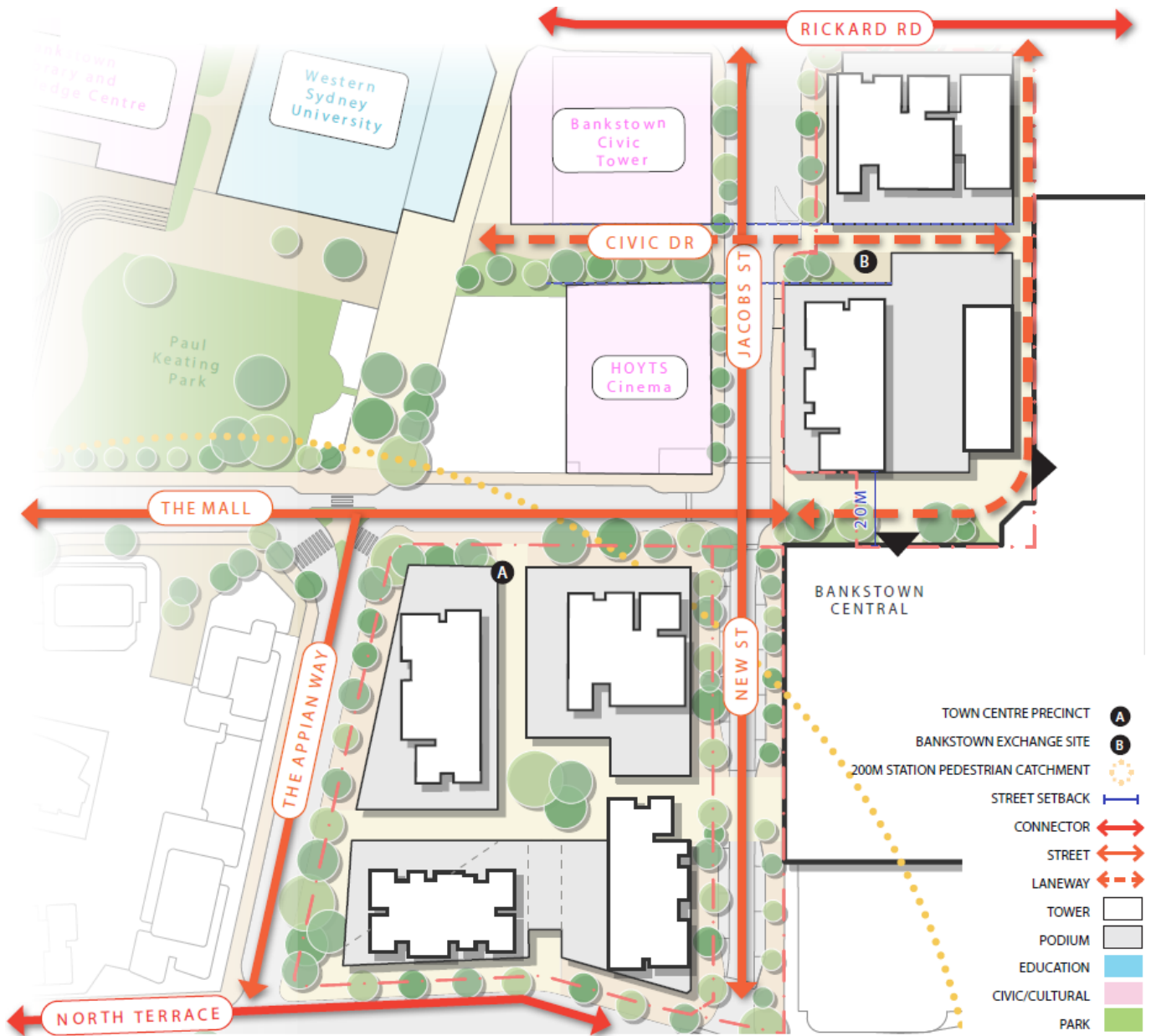


Figure 3 Diagram showing the intended public domain and connectivity as part of Phase 1 development

Source: Woods Bagot

4.2.1 Affordable housing approach

It is acknowledged that there is a preference by the Department that the affordable housing supply is held in perpetuity. Following engagement with our preferred CHP it is abundantly clear that housing held in perpetuity does not necessarily create the best housing outcomes with the following feedback being provided:

- *Tenant cohorts need change over time in terms of property configuration needs (number of 1, 2 and 3 bedroom properties). Our purpose is to match properties to the needs of tenant cohorts.*
- *Affordable housing at the end of the day requires a subsidy. CHPs operate on very low margins and are generally reliant upon some form of subsidy. Most committed subsidy programs that can be accessed do not go beyond 15 or 25 years in the case of HAFF.*
- *CHPs need to meet investor/debt provider's requirements. They do require ability for liquidity which could involve the sale and repurposing of some assets*
- *Big lifecycle maintenance decisions generally happen around the 12-18 year time point. Depending on requirements at the time it may make more financial sense to asset recycle than continue to invest into major refurbishment*
- *In terms of the housing continuum, it is critical that there are properties, other than new properties being transacted to enable new entrants to the housing market to have the ability to purchase a property that is affordable.*

Vicinity is committed to ongoing collaboration with CHPs to ensure the nominated Affordable Housing targets are achieved, if not exceeded. It is important that development on the site is not imposed with TOD affordable housing requirements and a separate Council affordable housing levy.

Further, we request that any requirements for the delivery of affordable housing do not require dedication of that affordable housing. This is particularly important in a BtR context, where single ownership of the asset is critical. Requiring dedication of affordable housing to a third party would require subdivision of the building and therefore make a BtR approach unworkable. It is important to consider that the Revenue NSW requirements for eligibility for land tax reduction for BtR do not allow subdivision within the first 15 years, so the dedication and subdivision of affordable housing would be inconsistent with government's own policy in relation to BTR.

5.0 Key issues and recommendations

5.1 Removal of non-residential floor space

5.1.1 Reduced demand for non-residential floor space

The proposed non-residential FSR requirements included in the EIE are inconsistent and at odds with the current market conditions, which recently, has seen a severe downturn in market demand for non-residential uses, as a consequence there has been no significant pre-commitments of office in Bankstown for a number of years and, indeed, no new office buildings of any significant scale.

Due to existing leasing and carparking encumbrances at the Shopping Centre the non-residential FSR mandates that are proposed to be applied to the Town Centre Precinct and the Bankstown Exchange, the only two unencumbered sites, will preclude any immediate investment into development.

Accordingly, Vicinity seek a more flexible approach to the planning controls that can accelerate the delivery of much needed housing supply and the ability to deliver EGF when market conditions improve, which currently is extremely difficult to anticipate when this will be. It is noted that the existing shopping centre already delivers some 3,400 jobs and 91,090m² of EGF. This equates to a 0.8:1 FSR across the whole site and Vicinity is prepared to underpin the masterplan with this as minimum EGF across the site (however not in each individual precinct).

The lack of demand for commercial office floor space is further highlighted by Vicinity's extensive pre-leasing campaign for the Bankstown Exchange site where no pre-commitment opportunities for office floor space were achieved in the three years since the Bankstown Exchange office DA was approved in July 2021. The absence of pre-commitments is due to a lack of demand from large occupiers in Bankstown. Importantly, we will only be able to develop commercial office space on this site once a suitable sized tenant pre-commitment is achieved, and there is confidence that the balance of space can be leased during construction, that will appropriately reduce the overall income risk of the project. This pre-lease approach is typical for office developments.

In this regard, Council Commissioned an Independent Market and Economic Advice in relation to Bankstown Central, which was prepared by AEC Group in and is included at **Appendix B**. The AEC Group Advice concluded that the commercial office market in Bankstown is in a weak position and there is no demand for commercial office space, as demonstrated through Vicinity's active marketing of the Bankstown Exchange site which resulted in no pre-commitments. Additionally, information obtained from JLL indicates that there are significant vacancies in the Flinders Centre building (3,200m²) and the WSU building (10,500m²), with minimal absorption of only 175m² in the last 12 months which was leased within the Flinders Centre.

The AEC Group advice is included at **Appendix B** and notes that there is significant demand for residential dwellings, stating that *'There is a clear need to deliver more vital housing throughout the Sydney region, which will inevitably come, as Government introduces additional incentive measures in order to stimulate construction activity.'* Therefore, the minimum non-residential FSR requirement should be removed as part of the finalisation of the controls to allow for development to occur on the site, as it is important that the planning controls allow for development that can attract investment and be delivered. This removal will not preclude EGF from being delivered over time as EGF markets improve and are able to be delivered alongside housing supply.

Moreover, the site is situated directly opposite the future metro station which is set to open in late 2025. The metro will provide frequent, direct connections from Bankstown to key centres within the global economic corridor including the Sydney CBD, North Sydney (Victoria Cross Station) and Macquarie Park. In the absence of demand for non-residential uses in Bankstown, the provision of residential development will address the significant demand for housing supply, while also minimising competition on centres within the global economic corridor. The provision of these frequent, direct connections to the Sydney CBD, North Sydney and Macquarie Park aligns with the intent of the 30-minute city vision set out in the Greater Sydney Region Plan 'A Metropolis of Three Cities'. Such rejuvenation of the Bankstown City Centre has the potential to emulate the successful regeneration of South-East London with the opening of the Jubilee Line.

The residential development that is to be provided on the site will also include the desired street level activation envisaged for the 'City Centre Character Area' in the Bankstown City Centre Master Plan through shop top housing developments with ground level active uses. This aligns with the intent of the Department's active street frontages control. Further detail in this regard is provided in **Section 5.1.4**.

5.1.2 Orderly and economic development of the land

The orderly and economic development of land across the site is an important consideration, particularly as there are existing lease and physical constraints relating to certain parts of the developable parts of the site around the perimeter of the existing shopping centre which impacts their ability to be redeveloped in the short to medium term. Of the broader site, there are two precincts that are shovel-ready for the delivery of significant development in the short term, in the form of the Town Centre Precinct and the Bankstown Exchange site. However, the proposed EIE includes significant non-residential floor space requirements on the Town Centre Precinct (2:1) and the Bankstown Exchange site (0.9:1), which will prevent investment in development on these sites, given the lack of market demand for this quantum of non-residential floor space (as detailed in **Section 5.1.1** above).

Importantly, the Town Centre Precinct is located along 'The Avenue' (The Appian Way) which is envisaged in the Bankstown City Centre Master Plan as 'the entry to Bankstown' and provides the primary connection that links Bankstown Sports Club in the south through to the WSU Bankstown Campus in the north. The Master Plan sets out that the most important component of this connection is the central segment which contains the future metro interchange, along with the iconic towers along North and South Terrace, which includes the Town Centre Precinct. To realise the ultimate vision of The Avenue, which is the gateway into Bankstown and the future metro and the long-term Bus Interchange solution which incorporates the Jacobs Street Extension, the development of the Town Centre Precinct is crucial, however this is contingent on the removal of any non-residential FSR requirements as these are uncondusive for investment and obstructive to development occurring on the site.

The other precincts will be developed in the medium to longer term due to existing lease covenants. The Stacey Street Precinct in all likelihood is the next major development site once long term lease amendments are negotiated. On this basis, Vicinity is seeking the height increase to 65m in the Stacey Street Precinct.

The locations of the abovementioned towers within the site are indicated in the excerpt from the Gateway Determination Report associated with the Bankstown Central Shopping Centre Planning Proposal, provided at **Figure 4** below.

The inclusion of non-residential floor space mandates on the Town Centre Precinct and Bankstown Exchange will therefore preclude the whole site from both housing and non-residential floor space delivery in the short to medium term which is at odds with the intention of the TOD Program, notwithstanding its key location directly opposite the future metro station.



Figure 4 Excerpt from the Bankstown Central Shopping Centre Planning Proposal

Source: Bankstown Central Shopping Centre Planning Proposal

Development to be delivered in the short term within the Town Centre Precinct and Bankstown Exchange

An Urban Design Study has been prepared by Woods Bagot illustrating the intended development to be delivered in Phase 1 of the site (Town Centre Precinct and Bankstown Exchange) in the short term, subject to the removal of the non-residential FSR requirements (refer to **Appendix A**).

The intended development, subject to refinement during the DA stage, includes:

- Construction and use of a mixed use development in the Bankstown Exchange site comprising three (3) residential towers above residential amenity, retail, food and beverage and commercial development, delivering approximately 400 apartments.
- Construction and use of a mixed use development in the Town Centre Precinct comprising four (4) residential towers above ground floor residential amenity, retail, food and beverage and commercial development delivering approximately 800 apartments.

The intended development to be delivered across the two precincts is illustrated in the architectural render of the concept envelopes included at **Figure 5** below. This development is contingent on the removal of the non-residential FSR mandates and the inclusion of additional height for the Bankstown Exchange site.



Figure 5 Render of the intended development to be delivered in Phase 1 within the short-term

Source: Woods Bagot

5.1.3 Bankstown Central Site is uniquely placed to deliver on TOD objectives

Under the National Housing Accord (Accord), NSW is tasked with delivering approximately 377,000 new well-located dwellings, including approximately 15,800 social and affordable dwellings, by 2029. This represents a significant level of new dwellings to be delivered over the next five years and requires the public and private sector to work together to achieve the delivery target. The consequences of failure to achieve these targets risks deepening the housing crisis further and the potential for long term harm to the economic prospects of the State.

In line with the intent of the Accord, the TOD rezoning initiative strives to deliver housing within station precincts to cater to the demand for housing supply within accessible locations. Bankstown Central constitutes the largest site in the Bankstown TOD precinct and is also one of the largest institutionally owned landholdings (approximately 11.4ha) in the broader NSW Government TOD program. It therefore represents a significant opportunity to catalyse the regeneration of Bankstown City Centre and to deliver on the TOD objectives.

The removal of the proposed minimum non-residential FSR control will help to achieve the NSW dwelling requirements of the Accord, and also assist Canterbury Bankstown Council in delivering dwellings in accordance with its assigned updated housing targets. It's been noted above that the State's decision to develop new health and hospital facilities will add to the demand for housing in the Bankstown CBD and surrounds. Further we note that the significant Western Sydney University, very proximate to the Vicinity site, and its student cohort and staffing will also lead to increased dwelling demand in the CBD.

Accordingly, the removal of the minimum non-residential FSR control from the rezoning proposal could facilitate the origination and ultimate development of a greater level of residential accommodation in the short term, which would directly address present political and policy drivers, meet TOD objectives, and be a catalyst for ongoing floor space investment within the Bankstown CBD.

The immediate commercial reality is that should the non-residential FSR mandates remain, Vicinity would be unable to invest any capital in the Town Centre Precinct or the Bankstown Exchange site (both of which are the only shovel ready sites without short to medium term leasing constraints) until the Bankstown office market matures enough to accommodate a significant office pre-lease and investment returns to this sector, which is unlikely for a long period of time, if ever.

Importantly, the removal of the non-residential FSR control would not preclude commercial uses being developed in the future, in circumstances where the demand for commercial office in Bankstown improves. Bankstown Central already provides a significant amount of EGF within the existing shopping centre of over 91,000m² of GFA which is to be retained. The intent with the development in Phase 1 and future phases is also to include ground level active uses, which will align with the Department's intent to introduce active street frontage requirements and will be delivered in a manner that seamlessly integrates with and complements the existing retail centre.

Further, the Bankstown Central site can be differentiated from the other sites identified by the Department in the TOD rezoning proposal where a non-residential FSR requirement is imposed as a mandatory control, given the significant public benefits which are not offered or required at the other sites. As detailed in **Section 4.2**, Bankstown Central will include the dedication of land for a new Jacobs Street extension for the purposes of a future bus interchange, which will cost approximately \$20 million to deliver. This will be pivotal in delivering Bankstown Complete Streets' vision of pedestrianising 'The Avenue' which is the key north-south thoroughfare in Bankstown City Centre providing connections to and from the future metro station entrance. On the basis of the new priority to provide affordable housing, and the lack of any uplift compared to the Bankstown Central Shopping Centre Planning Proposal, the proposed contributions and public benefits are being revisited, as detailed in **Section 4.2**.

Precluding development of the site though the imposition of a non-residential FSR requirement would represent a missed opportunity for more immediate investment at the site which is likely to act as a catalyst for further investment within the wider city centre, that would help to elevate the Bankstown City Centre and potentially be the catalyst to attract future employment generating floorspace to the city centre. It would also set a planning direction that is directly counter to the TOD program which seeks to deliver new housing to address the current supply and affordability crisis.

The non-residential FSR requirements have forced Vicinity to consider diverting investment into housing opportunities in Victoria and Queensland whereby no mandated non-residential FSR requirements are imposed, given the demand for housing in the context of the ongoing and worsening housing crisis across Australia. Accordingly, on the basis of the above points, the below recommendation is provided to allow for development to occur on the site.

5.2 Removal of mandated level 1 non-residential floor space

As detailed in **Section 5.1.1**, there is a lack of demand for non-residential floor space, however there is also a reluctance for EGF businesses to commit to Level 1 space in isolation of the balance of use in the building. Therefore, the existing mandate in clause 6.14 of the Canterbury-Bankstown LEP 2023 for the provision of non-residential uses on level 1 of development in the B4 zone mapped as 'Area 3' should be removed for the site, consistent with the approach undertaken as part of the Bankstown Central Shopping Centre Planning Proposal. Level 1 EGF will not be financially viable in every building across a masterplan and therefore this mandate should be removed. The Department indicated this control should be revisited and we support the Level 1 removal from clause 6.14 of the Canterbury-Bankstown LEP 2023 on the basis of the above.

Vicinity supports the proposed introduction of active street frontages for the Bankstown City Centre, including the site, and this should be limited to ground floor activation, which is paramount to the activation of the streetscape and public domain. The provision of active street frontages in the Bankstown City Centre, along with the proposed flexibility afforded to late night operation of certain retail and business uses will be integral to the intended activation of the 'City Centre Character Area', as envisaged in the Bankstown City Centre Master Plan.

With regard to activation, there is little or no benefit derived from above ground levels being mandated, and the intent with the redevelopment of the site, as shown in the Urban Design Study provided at **Appendix B**, is to include the delivery of active uses at the ground level and beyond this having larger components of EGF across multiple levels in future towers should large scale EGF become viable in the future. The design excellence

provisions applicable to the site as part of the existing Canterbury-Bankstown LEP 2023 will also ensure that the development is designed in a manner that provides for façade activation notwithstanding the above ground land use that is provided.

Imperative 1: Removal of proposed non-residential FSR mandates including the minimum non-residential FSR requirement and the requirement in clause 6.14 of the Canterbury-Bankstown LEP 2023 to provide non-residential uses on level 1 of any development.

It is recommended that the finalised instrument is amended to remove the minimum non-residential FSR requirement imposed on the Phase 1 development in the Town Centre precinct and Bankstown Exchange. This will be crucial in delivering development in the short to medium term on the site, and in realising the principles underpinning the TOD rezoning program without precluding future EGF to be delivered in the future. It is important to note that the existing 91,090m² of the existing EGF from the Bankstown Central Shopping Centre will be preserved, equating to 0.8:1 non-residential floor space over the entire site.

Additionally, it is recommended that the finalised instrument is amended to remove the requirement in clause 6.14 of the Canterbury-Bankstown LEP 2023 which sets out that non-residential uses are to be provided on sites that are zoned B4 and mapped as 'Area 3' as it applies to the site.

The proposed active street frontages provision will achieve the requisite activation of the streetscape and public domain and therefore this existing provision is onerous and will impact the ability to develop on the site, given the lack of market demand for non-residential uses on Level 1 of buildings.

5.3 Increased building height of the Bankstown Exchange site

The site has capacity for an increase to the maximum building height within the Bankstown Exchange site. The Urban Design Study prepared by Woods Bagot, included at **Appendix A** was developed for the Bankstown Exchange site and includes urban design testing of an 83m (RL 108m) height, which demonstrated that appropriate residential amenity outcomes would be achieved with such a development including compliance with key Apartment Design Guide parameters. Compliance of an 83m development on the Bankstown Exchange site with key ADG solar access requirements is demonstrated in **Figure 6** below. This would also provide a continuation of the landmark buildings delivered along the important east-west gateway into Bankstown along Rickard Road.

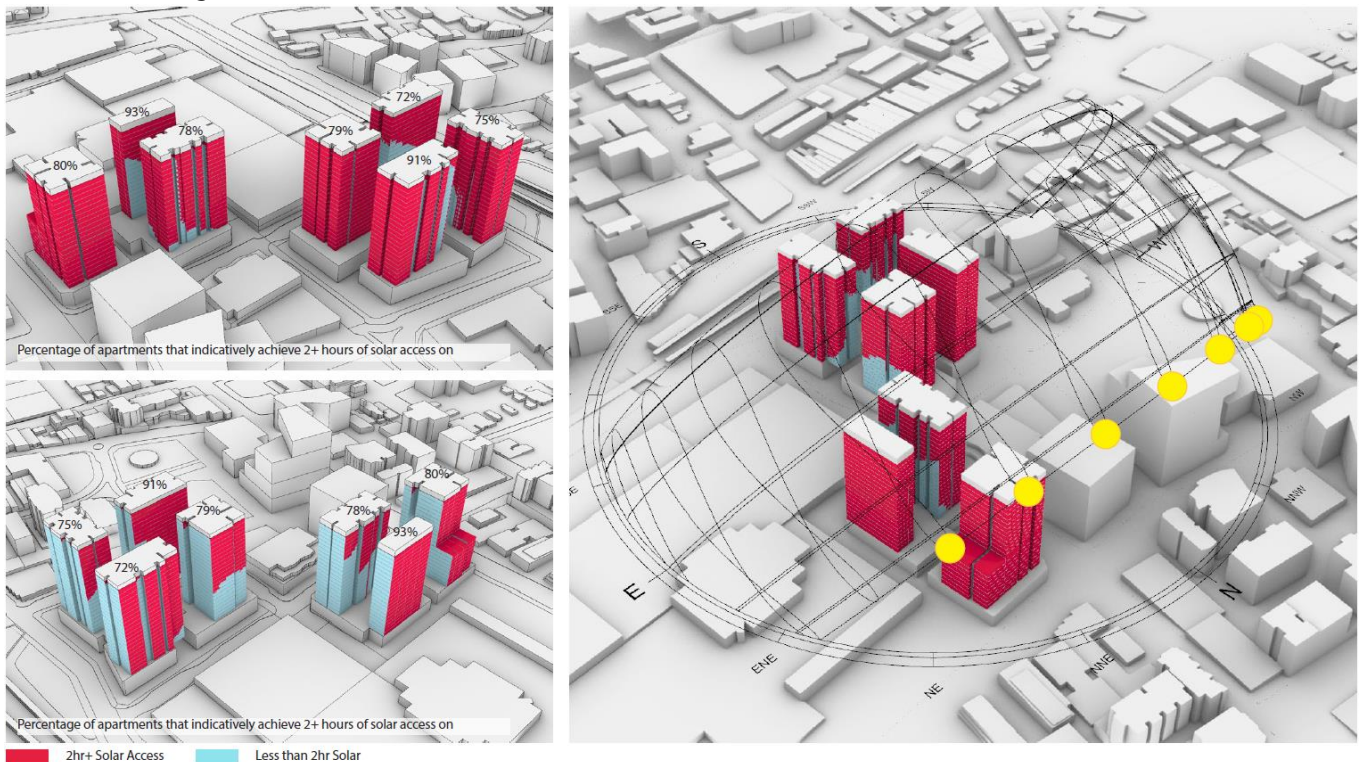


Figure 6 Solar access compliance of the indicative Phase 1 development

Source: Woods Bagot

It is noted that the EIE sets out that increases to density for sites that provide public open space and community infrastructure are being considered, however it does not provide any uplift in density for the site. The proposed contributions and public benefits include dedication of land to facilitate a future bus interchange, public realm connections, and the Concept Scheme for Phase 1 of development on the site prepared by Woods Bagot (**Appendix A**) includes additional public open space totalling 10,645m² in area to be delivered in Phase 1 of development. This is in addition to substantial affordable housing that is intended to be provided as part of Phase 1 of development on the site. Accordingly, uplift should be provided on the Bankstown Exchange site, with a height increase of up to 83m (RL 108m), which has been demonstrated to achieve appropriate residential amenity outcomes, and compliance with key Apartment Design Guide parameters.

Imperative 2: The maximum building height proposed for the Bankstown Exchange site should be increased to 83m (RL 108m).

It is recommended that the finalised instrument increases the maximum building height for this part of the site to 83m (RL 108m) enable the realisation of Phase 1 of development across this significant landholding, which will include approximately 1,200 dwellings.

Proposed Maximum Height of Building Maps have been prepared by Woods Bagot illustrating this intended height increase for the Bankstown Exchange site and these are included at Appendix A, with an excerpt included at Figure 7.

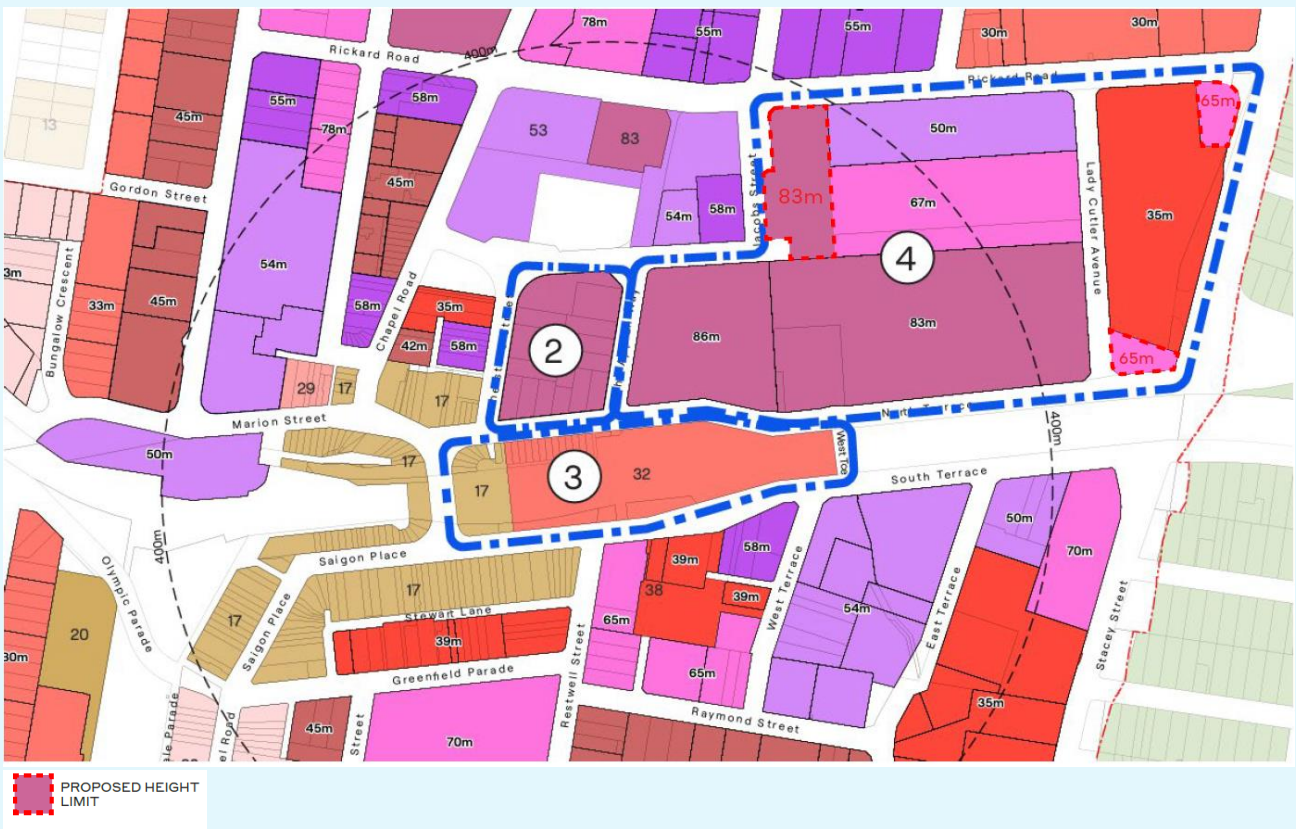


Figure 7 Proposed height of buildings map as it relates to the site

Source: Woods Bagot

5.4 Inclusion of a total gross floor area cap for the site

The applicable maximum FSR controls applied to the site should instead be in the form of a GFA cap that can be flexibly applied to the broader Bankstown Central site to allow for the development potential envisaged on the site to be delivered. Given that the site is the largest privately owned landholding in the Bankstown TOD precinct, which is capable of early delivery, it is uniquely placed to be a catalyst for the renewal of the precinct in accordance with the objectives of the TOD rezoning initiative.

Accordingly, the application of a maximum GFA cap on the site of 447,523sqm will allow for the site's development potential to be realised throughout the entire site, instead of being limited to maximum FSR controls that are being applied to different parts of the site. This flexibility will ensure that investment decisions

can be made now to deliver on the TOD objectives in Phase 1 of development in the Town Centre Precinct and Bankstown Exchange, without compromising investment decisions being made in the future for the balance of the site.

It is noted that the approach of applying a maximum GFA in lieu of a maximum FSR control has been taken by the City of Sydney with regard to the Western Gateway sub-precinct as set out in Clause 6.53 of the Sydney Local Environmental Plan 2012. Being the largest privately owned landholding in the Bankstown TOD precinct, spanning over 11.4ha, this approach is considered appropriate to achieve an optimal outcome on this site, which forms a critical component of the Bankstown City Centre, and will be crucial to the achievement of the TOD objectives.

Precedent for this form of flexibility can be found in emerging transport destinations within mature cities such as London, Milan and Paris. Additionally, the planning system in NSW is ably capable of accommodating a site-wide GFA limit in lieu of a maximum FSR for significant sites, as demonstrated in the Western Gateway sub-precinct and Blackwattle Bay.

Accordingly, the permissible GFA on the basis of the site's total area should be flexibly applied to allow for optimal urban design outcomes to be achieved. This GFA cap applied to the site should also have regard to and exclude existing underground floor space within the Bankstown Central Shopping Centre, as detailed in **Section 5.5**.

Imperative 3: A total GFA cap should apply to the site in the Canterbury-Bankstown LEP 2023 instead of the proposed maximum FSR, to provide flexibility to development delivered across the site and for the realisation of the site's development potential.

It is recommended that the finalised instrument includes a site-specific provision in the Canterbury-Bankstown LEP 2023 which sets out the maximum GFA of 447,523m² for the entire Bankstown Central site. The provision should read that:

'The development on the Bankstown Central site will not result in the total gross floor area exceeding 447,523m².'

5.5 Underground FSR exclusion to apply to existing and future development

The Department is to be commended for the introduction of an underground floor space exclusion clause for certain sites in the B4 Mixed Use zone. The site is the largest single private landholding across the entire TOD precinct and therefore is ideally suited to utilise this provision for both existing and future development.

The definition of underground should be clarified as the site includes existing floor space that is below natural ground level and therefore should be excluded from the total existing GFA. Given the extent of the site, there is the ability to exclude existing below ground floor space from the Bankstown Central Shopping Centre which will allow for additional new above ground floor space to be provided for the purposes of transformative positive outcomes in line with the intent of the TOD program. Such development will act as a catalyst for further investment in the precinct and will include the delivery of significant housing supply, addressing the objectives of the Accord, Council's housing targets and the Department's objectives for the Bankstown TOD precinct.

Imperative 4: Existing and future underground floor space on the site, including any floor space below natural ground level on the site, should be excluded from the maximum achievable GFA for the site.

It is recommended that the finalised instrument includes an underground floor space exclusion clause that applies to existing and future underground floor space on the site and clearly defines how underground floor space is calculated.

5.6 Increased building height for Stacey Street precinct

The site has capacity for increases to building heights within the northern and southern fringes of the Stacey Street Precinct up to a maximum building height of 65m. The proposed controls only include a maximum building height of 35m – 55m in the Stacey Street Precinct. There is significant potential to increase this maximum building height to 65m for Towers O and P, situated in the north-east and southern portions of this precinct (as shown in **Figure 4**) which will allow for the delivery of viable development to be provided in this

precinct. It is noted that this site is currently constrained by long term lease arrangements which impact the ability to develop in certain locations, however, the planning controls can be adjusted to allow this precinct to be developed in its logical phase of development.

The capacity of the site to deliver heights of up to 65m in the location of Towers O and P has been demonstrated as part of the shadow analysis relating to the Stacey Street Precinct prepared by FJC to support the previous Bankstown Central Shopping Centre Planning Proposal (refer to **Appendix D**). Namely, the Study confirms that Block P is located 95m to the north of the closest residential property and includes shadow diagrams indicating that limited shadow impacts will be caused by a 65m tower in this location, with the shadow generally cast over streets and the railway line (refer to **Figure 8**).

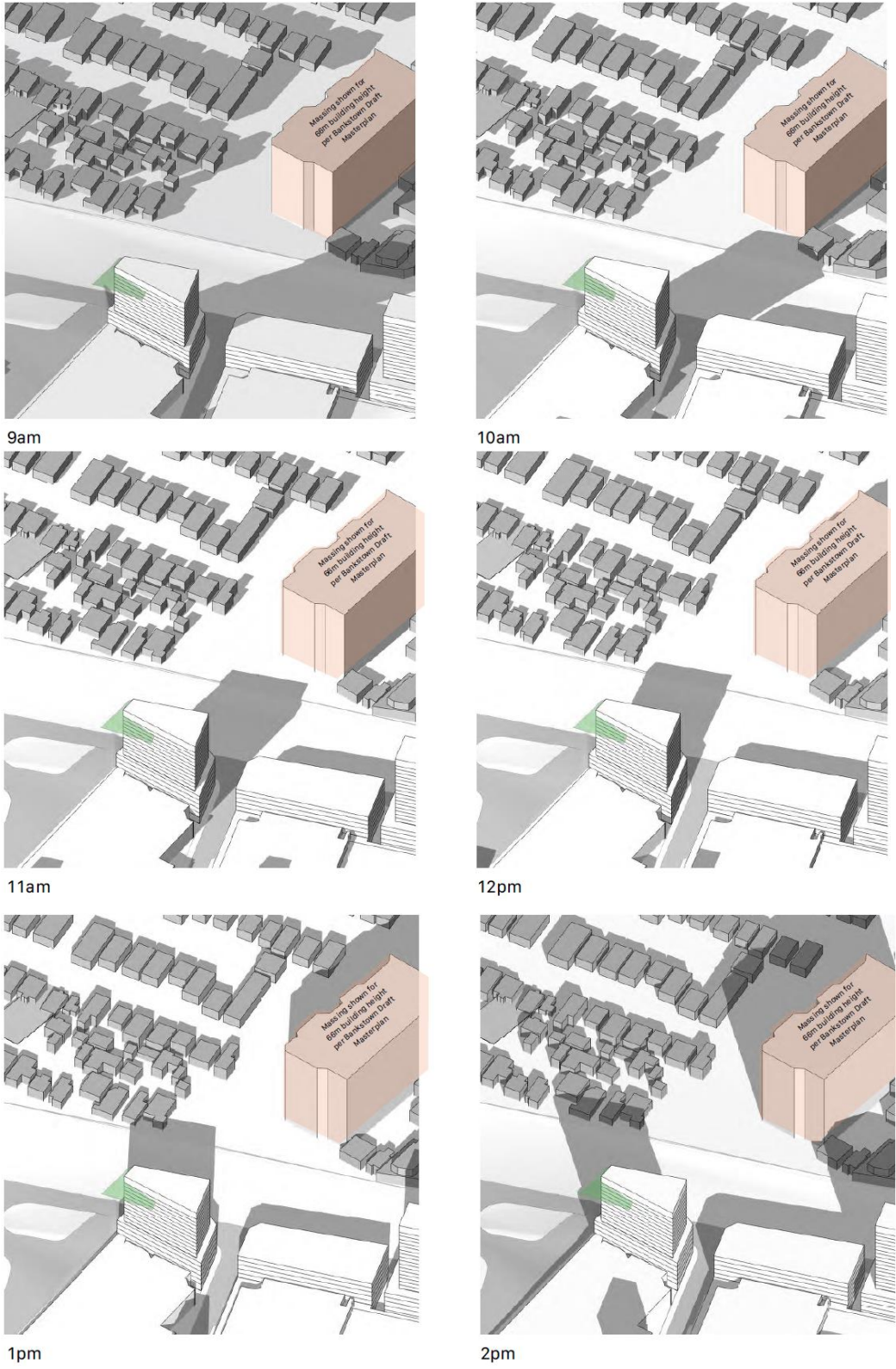


Figure 8 Shadow diagrams relating to a 65m tower in the location of Tower P

Source: FJC

Similarly, an increased building height for Tower O would not cause significant adverse shadow impacts. The closest residential property is 55m to the east of Tower O, and the Shadow Study indicates that there will be limited shadow impacts to surrounding residences, with the primary overshadowing caused to the rooftop of the existing shopping centre, as demonstrated in **Figure 9**.

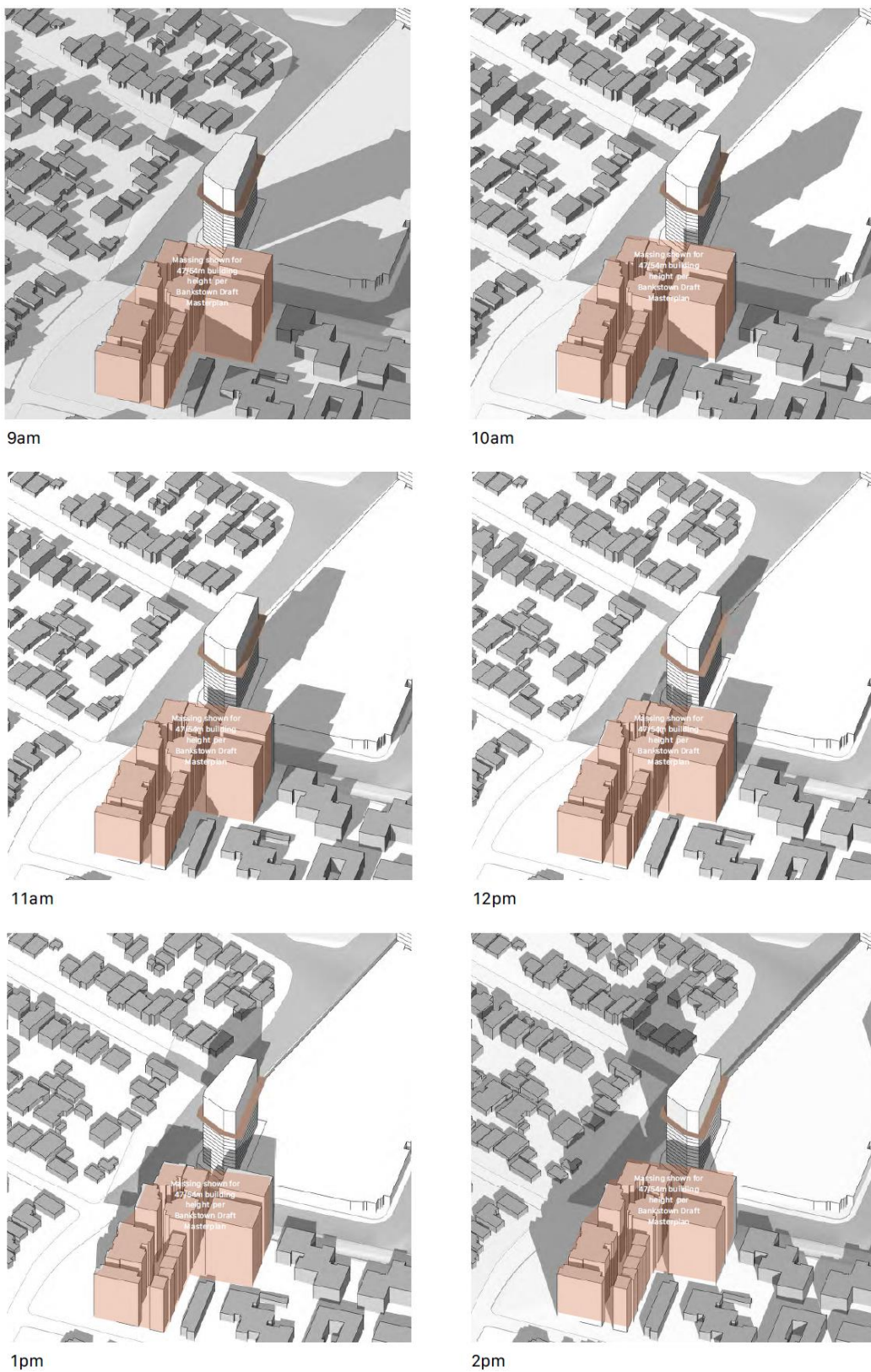


Figure 9 Shadow diagrams relating to a 65m tower in the location of Tower O

Source: FJC

Imperative 5: The maximum building height proposed for the Stacey Street Precinct should be increased to 65m.

It is recommended that the finalised instrument increases the maximum building heights for this part of the site to enable the realisation of development on this part of the site. This proposed height has been demonstrated to achieve acceptable overshadowing impacts of surrounding residential properties.

Proposed Maximum Height of Building Maps have been prepared by Woods Bagot illustrating this intended height increase for the Bankstown Exchange site and these are included at Appendix A, with an excerpt provided above in Figure 7.

6.0 Conclusion

Vicinity thanks the Department for the opportunity to provide this submission in relation to the Bankstown TOD rezoning proposal. Vicinity is available to meet and discuss the TOD Program, the contents of this submission and the Department's considerations in the forthcoming planning legislation.

The site constitutes the largest single private landholding in the Bankstown City Centre at 11.4 hectares and is shovel ready to deliver approximately 1,200 homes including a minimum affordable housing contribution of 3% for the first phase of development, along with significant public domain improvements and the Jacobs Street Extension to help facilitate an expanded bus interchange solution for the Bankstown CBD. This intended development on the site, which will galvanise the Bankstown City Centre and catalyse its ongoing regeneration in line with the objectives of the TOD Program is contingent on the adoption of the recommendations set out in this submission, in summary including:

- **Imperative 1:** Mandated non-residential floor space ratio (FSR) requirements are to be removed from the Phase 1 development, however an overall minimum of 0.8:1 non-residential FSR will be delivered on average across the broader site. Remove the requirement under clause 6.14 of the Canterbury-Bankstown LEP 2023 for the inclusion of first floor non-residential uses.
- **Imperative 2:** Remove nominated FSRs for the site and replace with a singular gross floor area (GFA) standard over the entire site.
- **Imperative 3:** Increase the maximum building height applicable to the Bankstown Exchange site to 83m (RL 108m).
- **Imperative 4:** Include existing and proposed development on the site as part of the subterranean floor space exclusion clause.
- **Imperative 5:** Increase the maximum building height permitted in the Stacey Street Precinct to 65m.

Further to these imperatives, it is important that the Department works closely with Council to ensure that the related Development Control Plan prepared by Council harmoniously relates with the finalised controls in the TOD rezoning proposal.

From: [Planning Portal - Department of Planning and Environment](#)
To: [DPE Bankstown TOD Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: [WARNING: UNSCANNABLE EXTRACTION FAILED]Webform submission from: Bankstown TOD rezoning proposal
Date: Friday, 30 August 2024 4:18:29 PM
Attachments: [property-council-submission-tier-1-accelerated-precincts.pdf](#)

Submitted on Fri, 30/08/2024 - 16:17

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Ross

Last name

Grove

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

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Westmead

Please provide your view on the project

I am just providing comments

Submission file

[property-council-submission-tier-1-accelerated-precincts.pdf](#) (2.26 MB)

Submission

As attached

I agree to the above statement

Yes

30 August 2024

Monica Gibson
Deputy Secretary
Planning, Land Use, Strategy, Housing and Infrastructure
Department of Planning, Housing and Infrastructure
Lodged via NSW Planning Portal

Submission to the NSW Government's Tier 1 Transport Oriented Development Program (Accelerated Precincts)

Dear Ms Gibson, *Monica,*

The Property Council is pleased to provide comment on the various Explanations of Intended Effect (EIE) for the Accelerated Precincts on exhibition as part of the NSW Government's Transport Oriented Development (TOD) agenda.

Our submission is broken into key parts and provides comment on the overall planning framework, in addition to more specific feedback on a precinct by most precinct basis. We are particularly enthusiastic about the steps taken by the government in taking existing place strategies and pre-planning work to bring forward these initial accelerated precincts.

As our members have considered the precinct EIE's and structure plans, development feasibility has been at front of mind. The NSW Government has a short window of time to deliver 377,000 new dwellings as part of the National Housing Accord and the key consideration driving member feedback has been whether development under the proposed controls and contributions will be achievable in an environment of inelastic price expectations and escalation of costs.

To this extent we have raised concerns about the level of affordable housing contributions proposed across the precincts. The TOD opportunity - and the delivery of significant development uplift - is one of the few very real opportunities for a contribution of this nature to work, and while indicative contributions have been provided, concern has been raised about the viability of these rates and their impact on project feasibility. We address this issue and provide options for the Department to consider in Part One of our submission.

In some precincts, the accelerated nature of the rezonings has resulted in our members identifying areas and opportunities to deliver additional housing. In these cases we have asked the Department to identify "future investigation areas" and future stages of TOD rezoning. These opportunities will be discussed in Part Two of our submission.

Congratulations to you and the entire Planning, Land Use, Strategy, Housing and Infrastructure team on the acceleration of these precincts. While there is more work to do in addressing our housing supply crisis, we are committed to achieving practical and workable outcomes.

If you wish to discuss aspects of our submission further please feel free to reach out to myself or our Western Sydney Regional Director Ross Grove on [REDACTED] or via email to [REDACTED]

Yours sincerely,



Katie Stevenson
NSW Executive Director
Property Council of Australia



**Submission to the NSW Government's
Tier 1 Transport Oriented
Development Program (Accelerated
Precincts)**

August 2024

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Part One: A new planning pathway

State Significant Development

The draft Explanation of Intended Effect (EIE) proposes a temporary State Significant Development (SSD) pathway until November 2027 for residential development applications valued over \$60 million. In support of the proposal the EIE claims this approach will ensure a consistency across the rezoning and assessment of these precincts.

Given the significance of the Tier 1 precincts to the delivery of the state's housing targets under the National Housing Accord, the Property Council is supportive of opening of the pathway to projects rezoned under the program.

The 2-year time limitation for applications under this pathway is not supported. Projects of a larger scale involve a level of planning and preparation work that is likely to require a longer period of pre-lodgement activity, in addition to creating an unintended consequence of a larger number of applications being "rushed" into the system in the leadup to the closure of the SSD pathway in November 2027.

While there is a case to be made for a periodic review of the type of development that is subject to an SSD pathway, this should occur in the context of all state significant development with a view toward creating durable, responsive and proportional assessment pathways rather than a piecemeal and temporary approach.

Policy options

Working with our members, we have identified two options to improve on the proposal in the EIE:

- Option One: Provide a permanent State Significant Development (SSD) pathway for residential development over \$60 million within each of the Transport Oriented Development Precincts, with any future changes to the eligibility criteria and CIV thresholds for State Significant Development to be considered as a part of a periodic statewide review.
- Option Two: Extend the proposed temporary provision of a State Significant Development Pathway from two years to the five-year National Housing Accord Period.

Recommendation

1. Make the State Significant Development (SSD) pathway permanent, with any future changes to the eligibility criteria and CIV thresholds for State Significant Development to be considered as a part of a periodic statewide review.

Concurrence and referral

The EIE proposes a 5-year exemption from concurrence and referral requirements that are not considered high-risk to speed up assessment timeframes. It is also proposed that high-risk concurrence and referrals will be retained to ensure safe and orderly development.

While specific detail on concurrence and referral requirements in the exhibition material is limited, the Property Council is acutely aware of the role that prolonged concurrence and referral assessment times have in stretching out the determination times for applications, in addition to the uncertainty created by a referral where the outcome is unclear or inconsistent.

Our members commonly identify delays related to the consideration of referrals related to traffic management, stormwater management, and building in close proximity to either utilities or major public transport assets.

Removal of duplicate referrals

In some cases, referrals to emergency services such as the Rural Fire Service or the State Emergency Service occur at both the planning proposal stage and development application stage. This duplication of referrals needs to be reviewed by the Department, with the objective of promoting a level of careful and thorough pre-planning at the planning proposal stage with an ultimate design to minimise further agency referrals where an application meets the objectives of a relevant development control.

National practices

In November 2017, the Property Council of Australia's Residential Development Council released its research paper *Cutting the Costs: Streamlining State Agency Approvals*. The report makes three findings which remain relevant today:

- The current approach to state agency approvals is inconsistent, inefficient and adds to housing costs
- There is considerable scope for reform in each state and territory that would lift our capacity to boost housing supply pipelines, and
- Governments interested in reducing their own administrative costs have plenty to gain from transforming approval processes.

The report benchmarks states against key design elements of good planning systems, namely:

- Only one body should assess an application, using consistent policy and objective rules and tests
- Referrals should be limited only to those agencies with a statutory role relevant to the application
- Referrals should be for advice only
- A referral authority should only be able to give direction where this avoids the need for a separate approval process.
- Referral agencies should specify their requirements in advance and comply with clear response times.

This report formed a significance basis for the Property Council's advocacy in subsequent years, leading up to its support for the creation of the Planning Delivery Unit in July 2020. While

the operation of the PDU was a positive step forward for unblocking referrals across government, the model stopped short of compelling agencies to respond within fixed timelines.

Queensland's SARA model

While potentially outside of the scope of the immediate rezoning agenda, our members generally share the view that the Queensland Government's State Assessment and Referral Agency (SARA) remains the best practice of state governments across Australia.

This model, and its practical application in a local context should be considered as a policy priority beyond the immediate precinct rezoning agenda.

Unnecessary referrals

In consultation with our members on agency referrals, the feedback ranged from the need to identify "low hanging fruit" and the removing the need for additional reports on items which are likely to be considered as part of the initial rezoning. The "low hanging fruit" sought the removal of requirements for social impact assessments, crime prevention strategies, economic impact assessments, infrastructure strategies and traffic impact assessments given that these impacts are best considered as part of the rezoning of the entire precinct.

"Life or death" referrals

The EIE lightly touches on a need to retain referral and concurrence requirements in situations that are "high risk". This seems like a reasonable approach, however consideration should also be given to whether this consultation should occur at the time of zoning so that issues like fire, flood and emergency service risk can be considered at a whole-of-precinct level, rather than ad hoc advice for development applications that comply with the relevant controls.

Turnaround time caps

Additionally, our members were very quick to point out that improvements to the remaining concurrences and referrals are likely to perform "only as well as the slowest moving part", meaning that a prolonged water referral effectively offsets any gains realised by incremental improvements elsewhere in the concurrence and referral framework. As a result, we are recommending that any referrals that continue to apply to a TOD Precinct be subject to a response time of 90 days, extendable to 120 days with the agreement of the Department.

This limitation on referral times provides certainty to industry and the Department, while elevating the significance of the TOD agenda to non-planning areas across government that is reflective of the NSW Government's housing agenda.

Recommendations

1. Concurrence and referral requirements should be turned off in as many cases as possible, particularly where an application broadly complies with a development control.
2. In the limited circumstances, where referrals and concurrence are deemed necessary, the period for comment be limited to 90 days.
3. Where this hasn't already occurred, concurrence and referral agencies develop plans and policies to enable the swift assessment of applications in a TOD location (e.g. creating standard conditions of consent for building across each component of trunk drainage infrastructure in a precinct structure plan).

4. The NSW Government give further consideration to how to best manage the burden of concurrences and referrals on the delivery of new housing supply for development applications outside of the focus of the Tier 1 TOD accelerated precincts.

Affordable housing contributions

Across the various TOD locations, in-perpetuity Affordable Housing Contributions are proposed at various rates spanning from 3% in Bankstown and Bella Vista to 15% in Crows Nest and Macquarie Park.

A summary of the Affordable Housing Contributions by precinct can be found below:

Precinct	Affordable Housing contribution	Anticipated affordable housing (approx)
Hornsby	5-10%	250-500
Macquarie Park	10-15%	460-690
Kellyville and Bella Vista	3-8%	620-1,650
Crows Nest	10-15%	325-488
Bankstown	3-10%	375-1,250
Homebush	5-10%	805-1,610

Our position on inclusionary zoning

Inclusionary zoning can only work in specific situations, where it doesn't harm the feasibility of projects. Get it right, and inclusionary zoning can add to the stock of social and affordable housing. Get it wrong, and it can stop housing from being built or make housing in the surrounding development unaffordable.

If inclusionary zoning could be made to work, it would be in specific precincts where development potential is being dramatically increased, or government is supplying the land, and only where it's applied to new developments, not projects already in the pipeline.

Contributions not viable

In the present market conditions, these contribution rates are not economically feasible and will severely restrict the development capability of each of these precincts. We note the Department has not produced any economic modelling to justify the determination of these rates, and in the absence of this material it is difficult to help identify where in the rationale underpinning the contributions the government has erred.

In June this year we launched our research report, *Release the Pressure*. The report identifies that infill development in the Central River City and Western Parkland City is no longer economically feasible because the development margin between costs and anticipated sale prices create an unacceptable risk for lenders.

The report identified increased construction costs, the new Housing and Productivity Contribution (in effect from 1 October 2023) and Sydney Water Development Service Plans (in effect from 1 July 2024) as the key cost drivers placing pressure on feasibility. The inclusion of new affordable housing contributions creates another cost barrier to the delivery of new housing.

Without the introduction of affordable housing contributions, development feasibility is already called into question for the Bankstown, Bella Vista and Kellyville precincts; and at their current proposed level the affordable housing contributions will place pressure on the development

feasibility of the remaining precincts, particularly those sites which are not presently in government ownership.

Policy options

There are several options available to government to address the impact of affordable housing contributions on development feasibility. Unfortunately, the government has not provided any economic modelling to support the case for these contributions and this has constrained the industry's capacity to respond to what is proposed..

Across the board rate reduction

Individual landowners are making submissions regarding the level of inclusionary zoning that can be feasibly accommodated on their site. These reductions will vary from location to location given the different price and market conditions and the cumulative impact of special costs that relate to an individual site.

What is clear is the affordable housing contributions are not affordable in their present form. A steep, across-the-board reduction in affordable housing contribution rates is the simplest and fastest way to promote development feasibility while meeting the NSW Government's ambition to introduce inclusionary zoning at a larger scale to the Sydney property and development landscape.

Cash contributions

Each of the proposed affordable housing contribution schemes requires the dedication of housing stock, without any option for developers to make a cash contribution where the delivery of this housing is unworkable.

By way of example, an apartment building of 20 dwellings in the Bankstown TOD precinct under the proposed rates will incur a 3% affordable housing contribution, requiring the dedication of 0.6 dwellings to a community housing provider.

It is recommended that the option of making a cash contribution in lieu of dedicating stock be included within all of the affordable housing contribution schemes. Cash contributions are a critical ingredient for low-rate affordable housing contributions schemes as they provide a degree of flexibility for the developer in meeting their obligations across a wide range of development types.

This will provide a better outcome for industry where the dedication of stock is impractical, and enable the community housing sector to pool funds with a view to consolidating their portfolio across a smaller number of sites.

Future of the existing height/floorspace bonus

We note the NSW Government has a stated intention of promoting in-perpetuity affordable housing within from the TOD precincts, to be enabled through the uplift created by the rezoning of the TOD precincts.

At the present contribution rates and in the present market conditions, the targeted delivery of affordable housing is unlikely to be achieved.

The likelihood of achieving the desired level of affordable housing is far more likely to be achieved under the existing infill affordable housing incentive with the affordable housing stock to be held for a period of 15 years. This is because affordable housing stock under this model

ultimately has an economic value which can be realised by the proponent, and this benefit can be taken into account by finance providers when making a lending decision.

Application area for affordable housing contributions

Our members note the accelerated rezonings tend to apply to smaller catchments within a defined precinct area. Differences exist within the exhibition material and draft affordable housing contribution schemes regarding the application of these contributions.

For the avoidance of doubt, our preference is for affordable housing contributions to apply only to those areas which have been the subject of significant residential uplift, and not to those aspects of a precinct which are yet to be rezoned.

Recommendations

1. The draft affordable housing contribution schemes not proceed at their present rates.
2. The affordable housing contributions across all precinct locations be reduced to ensure development is economically feasible and capable of attaining finance in the present cost and market landscape.
3. The NSW Government give careful consideration to retaining the in-fill affordable housing bonus as the most effective mechanism for the delivery of affordable housing within the 5-year National Housing Accord period, particularly in those markets where inclusionary zoning provisions might not be feasible.
4. Each of the Affordable Housing Contribution Plans be amended to make provision for cash contributions where the dedication of stock is impractical.

Height and floorspace bonuses

Exemption from in-fill affordable housing provisions

In December last year, the NSW Government implemented changes to the Housing SEPP to promote in-fill development and encourage private developers to deliver more affordable and market housing. The reforms included:

- A floor space ratio (FSR) bonus of 20–30% and a height bonus of 20–30% for projects that include at least 10–15% of gross floor area (GFA) as affordable housing. The height bonus only applies to residential flat building and shop-top housing.

A requirement that the affordable housing portion of the development to remain affordable and be managed by a registered community housing provider for a minimum of 15 years.

The EIE proposes to remove the application of the in-fill affordable housing provisions from the TOD precincts, preferring the application of an in-perpetuity affordable housing contribution.

In our consultation with members, this element of the proposal was a cause of disappointment given the clear market signal to industry that occurred with the introduction of the incentive in December. The view was roundly expressed that the Housing SEPP incentives were a considerably more effective mechanism for delivering affordable housing than the in-perpetuity contributions proposed in the exhibition material.

Low and mid-rise housing reforms

Concerns have been raised regarding the application of the low and mid-rise (LMR) housing reforms to the accelerated precincts. The EIE does not provide clarity as to how or if these reforms will apply.

The TOD rezoning agenda exists to provide pathways to deliver high levels of housing supply to meet the needs of the market and address the state's obligations under the National Housing Accord. In theory, the TOD rezonings should be of a scale whereby the industry would not be interested in considering its options under the LMR reforms, however our members have identified areas in the Crows Nest TOD where this is not the case. We discuss this specific example in the Crows Nest component of Part Two of this submission. For the industry to support the switching off of these provisions, we would need to be satisfied that all areas subject to an accelerated rezoning would be capable of achieving a floor space ratio higher than 2.86:1 across all precincts. We encourage the Department to make these changes in its final rezoning.

Status of seniors living incentives under Housing SEPP

The Housing SEPP provides incentives for seniors housing targeted at the development of "vertical villages". The incentives are designed to improve housing diversity, provide options for people to downsize while staying in their local community and promoting retirement villages as a viable development option, particularly when having to compete against traditional residential developers for the acquisition of land.

Specifically, the SEPP provides for incentives are between 15% and 25% bonus floor space, a reduction in the landscaped area requirements for residential care facilities from 25 m² to 15 m² per bed, and a new State Significant Development pathway for seniors housing for projects worth more than \$30 million.

The seniors housing aspect of the Housing SEPP is not mentioned in the exhibition material, although in the context of the switching off of affordable housing incentives we wish to confirm our support for their continued application in the areas subject to an accelerated rezoning.

Recommendations

1. Floor space ratios within the areas identified for rezoning need to be increased beyond 2.86:1 to provide a level of density beyond the capacity of the low and mid-rise housing reforms. These changes would need to be accompanied by a proportionate level of height adjustments..
2. The Housing SEPP incentives for seniors living continues to apply to the accelerated precinct.

Design excellence pathway

The EIE proposes to replace existing requirements for an architectural design competition with alternate design excellence provisions.

While the EIE provides minimal detail regarding the specifics of what is under consideration, the departure from design competitions is a welcome step forward as it removes a process which is both costly and time consuming, particularly when other mechanisms exist to promote design excellence.

We note applications that rely on the State Significant Development Pathway will be subject to design excellence provisions that already exist, and our members advise this is their preferred policy solution.

Award winning architects

The Property Council is aware of a proposal to create a pool of reputable architects for developers to use in the preparation of designs in place of holding a design competition. The pool of architects would be limited to practitioners who had either won a design competition in another location, or who had won a recognised design award.

In considering its support for this solution, the number of eligible practitioners would be a key consideration. We encourage the NSW Government to engage in targeted consultation with key industry groups including the Property Council prior to adopting this measure.

Limitation to existing design competition requirements

In adopting any change, the primary objective needs to be the removal of unnecessary cost and delay to the delivery of new housing. With this in mind, the Property Council is seeking confirmation that any of these changes will be limited to sites where the local council has already identified a requirement for an architectural design competition.

Recommendations

1. An alternate pathway should be provided to enable industry to deliver housing in the TOD precincts without being required to undertake a costly and time-consuming architectural design competition.
2. The preferred option is that the design excellence requirements attached to existing State Significant Development should apply in lieu of the requirement for a design competition.
3. Any alternate process be included as an option for sites which are presently the subject of a design competition, and not across all of the precincts identified for an accelerated rezoning.

Part Two: TOD Precinct feedback

Hornsby

The EIE for Hornsby proposes to deliver up to 5,000 additional new dwellings within the precinct. The development uplift includes mandatory affordable housing contributions of between 5-10% for all new residential development, delivering between 250 and 500 homes in perpetuity and managed by the community housing sector.

The proposed rezoning builds on the work of Hornsby Shire Council's Hornsby Town Centre Master Plan (2023) which was the culmination of five years of work to formulate an ambitious vision to transform Hornsby's major town centre.

Reach of study area

In identifying the parts of Hornsby selected for an accelerated rezoning, the Department has taken an approach of focusing on those locations with sites where an immediate uplift in housing is practical and likely to occur given a site's proximity to transport infrastructure, lot sizes and ownership patterns. This is a sensible approach.

Our members have expressed the view that sites exist at the periphery of the structure plan that are worthy of consideration in the accelerated rezoning. Within a walkable radius to Hornsby Station opportunities exist for further rezoning, with the furthest site to proposed for an accelerated rezoning only 618 metres from the station itself.

We encourage the Department to carefully consider landowner submissions seeking inclusion in the catchment area for accelerated rezoning, while identifying a future planning investigation area for streets within an 800m radius (subject to walkability) to enable further planning proposals to provide additional housing supply.

Government owned land

Land exists to the north of Hornsby Station (south of Bridge Road and bordering Jersey Street and George Street) that is not being rezoned. It is understood that DPHI is in discussions with the Transport Asset Holdings Entity (TAHE) to gauge the development potential of this land.

Mindful of the heights proposed for neighbouring sites in private ownership, we encourage this future rezoning to proceed in the short to medium term.

Recommendations

1. Consider landowner submissions seeking inclusion within the area identified for accelerated rezoning.
2. Identify a planning investigation area to enable further developer, council or state-led planning proposals within a walkable area of Hornsby Station.
3. Work with TAHE to rezone government-owned land in the precinct.

Kellyville and Bella Vista

The EIE for Kellyville and Bella Vista proposes to deliver up to 20,700 additional new dwellings within the precinct. The development uplift includes mandatory affordable housing contributions of between 3-8% for all new residential development, delivering between 620 and 1,650 homes in perpetuity and managed by the community housing sector.

Precinct boundary

The EIE identifies both a precinct boundary and focus areas within these boundaries identified for the accelerated rezoning.

Perplexingly, there is a large lot in single ownership (currently Parklea Markets) sitting immediately outside the wider precinct boundary that has been identified previously by proponents as the location of a future town centre. The site sits within the 1.2km radius required in the principles supporting TOD.

In addition to this site, Rothwell Circuit, Consolo Avenue and Almona Street in Glenwood have also been excluded from both the wider precinct boundary and focus area for accelerated rezoning, despite being even closer to both stations. The lot sizes, zoning and ownership patterns are not inconsistent with other similar areas to the west of Windsor Road that have been identified for accelerated rezoning.

We encourage the Department to consider including these locations in the accelerated rezoning for Kellyville and Bella Vista, and should further exploration be required, to identify the areas for further investigation or a future stage rezoning.

Supporting infrastructure

The Department in its public online briefings has already acknowledged the need for further school infrastructure in to support existing growth in the area. A new school has been identified for Kellyville, and the Department has confirmed that efforts are underway to identify further opportunities.

Additionally, Blacktown City Council has identified a need for greater walkability across the precinct. Old Windsor Road is the boundary between Blacktown and The Hills Shire Councils, and the width of this corridor becomes more challenging from a walkability perspective once the bus transitway and metro rail corridors are also considered.

To address these two issues, we encourage the Department of Planning, Housing and Infrastructure to work with the relevant government agencies to progress their investigations and ultimately business cases for these supporting infrastructure projects in order to ensure they are capable of being considered as part of the Urban Development Program.

Recommendations

1. Consider expanding the precinct boundary to include areas of Glenwood, including Parklea Markets within the 1.2km radius.
2. Department to work with other agencies to bring prioritise the delivery of schools and walkability infrastructure to support growth in the precinct.

Macquarie Park

A longstanding vision exists for the Macquarie Park precinct through the *Macquarie Park Innovation Precinct (MPIP) Place Strategy 2022* and supporting technical studies. The strategy informs a two-step state-led rezoning of the precinct with the present exhibition material seeking to accelerate the “Stage 2” rezonings.

The EIE for Macquarie Park proposes to deliver up to 4,622 additional homes close to three metro stations – Macquarie University, Macquarie Park and North Ryde. The additional homes will be complemented by a further capacity to deliver 1,989,815 sqm in commercial floorspace or 5,096 additional dwellings, subject to market demand.

The development uplift includes a mandatory affordable housing contribution of between 10–15% for all new residential development in the precinct, with the intentions of delivering to deliver between 460–690 affordable homes in perpetuity, managed by a registered community housing provider.

Future commercial demand

The Property Council of Australia’s July 2024 Office Market Report does not identify strong levels of demand to support the zoning of a commercial office market with capacity to grow to 1.9 million square metres in size. An office market of this size is equivalent to the combined size of the current Parramatta and North Sydney office markets.

With this in mind, we encourage the government to consider excising the North Ryde Riverside component of the precinct for future mixed-use residential development, and to carefully consider individual landowner submissions seeking to adjust non-residential floorspace components where these proposals assist in supporting development feasibility.

Grade	Vacancy, Jul 24 (%)	Vacancy, Jan 24 (%)	Net absorption, 6 months to Jul 24 (sqm)
A	19.9	21.0	14,859
B	18.9	18.8	-352
C	11.0	13.8	977
Total	19.3	20.1	15,484

Role of build-to-rent

The Property Council is supportive of the efforts of the NSW Government, to increase the takeup of build-to-rent (BTR) in Macquarie Park, including enabling the permissibility of build-to-rent within the employment zones as outlined in the EIE.

The provision for BTR will help deliver on the Place Strategy’s ambition for an 18-hour Macquarie Park economy, while the single-owner BTR model removes ownership barriers to office conversion should market conditions change in the future.

North Ryde Riverside

The Property Council welcomes an intensification of land uses for the North Ryde Riverside sub precinct identified in the EIE, however its proposed dwelling yield and non-residential components would benefit from changes to give the sub precinct a stronger role in delivering the housing our state needs to have in well-located areas.

Our members have noted the take-up of “innovation” business uses within the area has waned following the gradual withdrawal of CSIRO’s presence. The present buildings are of a B and C-Grade office nature and a mixed-use residential precinct with higher height and FSR controls is the preferred model for the precinct’s future.

We encourage the Department to consider a “Stage 3” rezoning of this sub precinct on a standalone basis, and its gradual separation from the overall Place Strategy as part of this future role.

Prohibition on data centres

Data centres present a range of challenges given their intense need for water and power. In areas outside Macquarie Park, landowners have expressed concern regarding the impact of this resource draw on the serviceability of surrounding land. The EIE cites streetscape activation concerns as the primary objection to including data centres in the precinct, however the innovation and technology needs of the precinct are reliant on a metropolis with nearby access to data centre capacity.

The Property Council does not support further restrictions on the permissibility of data centres until such time as the Department has prepared a well-considered strategy in collaboration with industry and relevant utilities providers to cater to the Sydney’s future data centre requirements and servicing capacity.

Recommendations

1. Identify the North Ryde Riverside sub precinct as an area for a further rezoning to deliver a significantly higher residential yield in the short-to-medium term.
2. Retain the permissibility of data centres in Macquarie Park until a citywide strategy on data centre needs is prepared with support and input from industry.

Bankstown

The EIE for Bankstown proposes to deliver up to 12,500 additional new dwellings within the precinct. The development uplift includes mandatory affordable housing contributions of between 3-10% for all new residential development, delivering between 375 and 1,250 homes in perpetuity and managed by a community housing provider.

Removal of non-residential core

The Property Council supports the removal of the non-residential core for the Bankstown town centre. While we accept there is a need to provide employment floorspace in Bankstown, demand for commercial-only floorspace is limited, and the city has historically struggled to attract large-floorplate tenants to pre-commit to office space in Bankstown.

This means that for office floor space to be delivered, another revenue-generating asset class (residential) is required for a project to attain development feasibility. Bankstown's future may be as a centre of jobs, but the only pathway to enabling that floorspace to be unlocked, is through the delivery of apartments to offset the commercial risk.

This same approach to non-revenue generating floor space should be considered when exploring contribution rates for affordable housing. While the scale of development uplift suggests that opportunities for inclusionary zoning are achievable, the imposition of non-residential floorspace requirements increases the pressure on project feasibility. In a market where existing costs are already high, we strongly encourage the Department to take non-commercial floor space requirements into account when setting an affordable housing contribution level.

Recommendations

1. The Department proceed with its proposal to pursue a mixed-use core in the Bankstown town centre.
2. The impact of mandating higher non-residential floorspace on project feasibility be considered when determining an in-perpetuity affordable housing contribution, with the government to determine whether or not to reduce the non-residential requirement or the contribution rate.

Crows Nest

The EIE for Crows Nest proposes to deliver up to 3,255 additional new dwellings within the precinct. The development uplift includes mandatory affordable housing contributions of between 10-15% for all new residential development, delivering between 325 and 488 homes in perpetuity and managed by a community housing provider.

Considering the success of the NSW Government's investment in Sydney Metro, the proximity of Crows Nest as a location in proximity to North Sydney and St Leonards, the short commute times to employment centres at Chatswood, Sydney CBD, Macquarie Park and Norwest, we believe that Crows Nest is capable of delivering more growth than the accelerated rezoning is seeking to achieve.

Opportunities to deliver more housing

The overwhelming view of members and landowners believe the effort to accelerate the rezoning of Crows Nest has resulted in less housing being proposed than the precinct is capable of delivering.

A new metro station, in close proximity to commercial centres Chatswood, North Sydney, Sydney CBD and Macquarie Park needs to be capable of delivering a higher level of development density – spread across a wider precinct catchment.

Decisions to retain non-commercial floor space ratios are not supported by industry, and the Economic Impact Assessment prepared by Atlas Economics, which cites on Property Council Office Market Report data would suggest the market for this office space is limited to non-existent.

We are recommending the TOD zoning proposal for be reworked to take on a more level of housing supply, and the extent of such a revision could potentially require either a "Stage 2" accelerated rezoning or a re-exhibition of new EIE and structure plan. Should the government opt for the latter option, we encourage this to occur at the same time as the exhibition of the accelerated rezoning of the Bays West Precinct early next year.

A future Crows Nest rezoning needs to deliver more housing beyond more than the immediate blocks adjoining the rail corridors and Pacific Highway. Such a rezoning should emphasize a more generous "walkable development radius" for both precinct rezoning, and where this is not immediately possible, a compatible future investigation area that welcomes creative planning proposals.

Demand for commercial office space

With its proximity to other commercial centres and the current prioritisation of housing across all levels of government, housing needs to be the primary driver for the Crows Nest precinct.

The economic impact report prepared by Atlas Economics relies on 2024 Property Council Office Market Report data to identify a 25% office vacancy rate in Crows Nest, with strong incentives (discounts) offered by leasing agents and a reference to the Crows Nest market as being dominated by "price conscious occupiers".

The projected future commercial takeup of 20,000 sqm over is unlikely to generate the pre-lease appetite for office investment that is proportionate to the non-residential floorspace requirements proposed in the EIE – this demand can effectively be accommodated within the market’s existing vacancy rate.

There is only one site in the Crows Nest precinct where the non-residential floor space ratio requirements have been reduced (by 10:1 to 1:1). We would encourage this sort of approach to other sites within the precinct to deliver affordable and market housing in response to the national housing crisis.

Defects in height transition

The transect planning hierarchy doesn’t flow outward from the Crows Nest centre, meaning that contrary to conventional planning logic, higher levels of density and development are achievable outside the development area.

This is because the areas outside the rezoning area benefit from low-mid rise housing and affordable rental housing bonuses that don’t apply within the rezoned area. There are sites located within 200 metres of the new Metro stop (on Nicholson Street) with floor space ratios of 1.6 :1 and 2:1.

In practice this means a site outside the accelerated rezoning boundary can theoretically achieve a floor space ratio of 2.2:1 if it’s located within 400m of a railway station, and combined with a 30% affordable rental housing bonus the floor space ratio would increase to 2.86:1.

These issues underscore the need for a higher density outcome for Crows Nest.

Treatment of existing planning proposals

A number of members have raised concerns at the impact of the proposed EIE and anticipated rezoning on existing planning proposals and applications in the system. In the interest of providing a planning system that delivers on both certainty and housing, it is critical that these matters be handled carefully, mindful of the resources that have been committed to getting these projects off the ground.

Recommendations

1. The Department prepare a new planning proposal for Crows Nest, building on the existing work of the Crows Nest Place Strategy and the EIE, to be considered as either a “Stage 2” rezoning, or a fresh proposal to be exhibited concurrent with the Bays West rezoning early next year. Such a rezoning should consider:
 - a. An adjustment to non-residential floor space requirements in response to established market conditions and the need to deliver additional affordable and market housing.
 - b. Expansion of the focus area for the Crows Nest rezoning, with additional height and density to be delivered over a wider walkable catchment, consistent with the declared walkable area of 1.2km noting the variety of accessible transport options across the precinct.

Homebush

The EIE for Homebush proposes to deliver up to 16,100 additional homes within the precinct. The development uplift includes mandatory affordable housing contributions of between 5-10% for all new residential development in the precinct, delivering between 805 and 1,610 affordable homes in perpetuity and managed by a registered community housing provider.

Reach of study area

The precinct boundaries skew heavily toward areas of Homebush covered by the Canada Bay local government area. While the precinct boundaries expand the full length of the Parramatta Road corridor in the Strathfield LGA, the only significant changes to planning controls relate to the areas to the east of Flemington Markets.

Opportunities for future rezonings exist to the west of Flemington Markets, and these opportunities warrant separate consideration. These areas bounded by Parramatta Road, Marlborough Road and the rail corridor need to be flagged for future planning investigation so as not to preclude the consideration of future planning proposals.

Recommendations

1. The areas bounded by Parramatta Road, Marlborough Road and the rail corridor be identified for future planning investigation so as not to preclude the consideration of future planning proposals.

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 4:17:54 PM
Attachments: [planning-submission-\(west-terrace.pdf\)](#)

Submitted on Fri, 30/08/2024 - 16:16

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

██████████

Last name

██████████

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

Yes

Info

Email

██

Suburb/Town & Postcode

ELANORA HEIGHTS 2101

Please provide your view on the project

I support it

Submission file

[planning-submission-\(west-terrace.pdf\)](#) (2.09 MB)

Submission

See attached submission.

I agree to the above statement

Yes

SUBMISSION

Address: Nos. 8, 8A & 10 – 14 West Terrace, Bankstown

Proposal: Bankstown Transport Oriented Development Rezoning Proposal

AUGUST 2024

No. 138 Woorarra Avenue
ELANORA HEIGHTS
NSW 2101 AUSTRALIA

p: (02) 9970 7214
e: daniel@dmpps.com.au
w: dmpps.com.au

30 August 2024



ABN: 78 176 118 998

No. 138 Woorarra Avenue
ELANORA HEIGHTS
NSW 2101 AUSTRALIA

p: (02) 9970 7214

e: daniel@dmpps.com.au

w: dmpps.com.au

Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Tracy Pendergast

BANKSTOWN TRANSPORT ORIENTED DEVELOPMENT REZONING PROPOSAL

Dear Tracy,

It is understood 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 to enable capacity for up to 12,500 new homes close to the new Bankstown Metro station.

It is further understood that you have worked in close consultation with Canterbury Bankstown City Council and other government agencies to prepare this draft rezoning proposal, and that community and land owner feedback on the draft rezoning proposal is important, as it will assist in shaping the future of Bankstown.

Our submission is simply that the existing approved development of the site achieved a height of 11 storeys and a FSR of **3.5:1** (see **Figure 1**), and has been stalled since 2016 (see **Figures 2 – 4**) on the basis that new controls were being introduced to greatly increase the development potential of the site. Firstly the abandoned Sydenham to Bankstown Urban Renewal Corridor Strategy, and subsequently the Bankstown City Centre Planning Proposal, which suggested FSR achievable upon the site would have been **4.75:1**, with a 51 metre maximum building height.

With application of 30% bonuses available under State Environmental Planning Policy (Housing) 2021, a FSR of **6.175:1** with a 66.3 metre maximum building height might have been achievable, with 15% of GFA dedicated as affordable housing for a period of 15 years.

The rezoning proposal suggests a maximum FSR of only 4:1, turns off the affordable housing bonus provisions at Chapter 2 of the Housing SEPP, and subsequently requires 3–10% of the floorspace to be dedicated in perpetuity as affordable housing (or a monetary contribution paid in lieu).

For a meagre 14% uplift in GFA, 3–10% of the resultant gross floor area will need to be dedicated in perpetuity as affordable housing. There is no incentive whatsoever to abandon the existing consent and to adopt the exhibited controls, thereby losing an opportunity for such a significant site to provide additional housing supply, including a component of affordable housing.

Site Address: Nos. 8, 8A & 10 – 14 West Terrace, Bankstown
Lot/DP: Lots A & B DP 388993, Lot 15 Sec 3 DP 5626, Lot 1 DP 1090544 & Lot B DP 313854
Site Area 4,048m²
Local Government Area: City of Canterbury-Bankstown
Environmental Planning Instrument: Canterbury-Bankstown Local Environmental Plan 2023
Existing Development: Hole in the ground
Proposed Development: Shop top housing

Site History

Development consent for Development Application 148/2008 was granted on 8 September 2009 for 'Demolition of Existing Structures and Construction of a Mixed Use Development Comprising of 127 Residential Units and 5 Commercial Units Basement Car Parking and Associated Landscaping Works with Strata Subdivision'.

Consent was subsequently granted to Development Application No. 739/2014 on 23 September 2015 for 'Construction of an 11 storey mixed commercial and residential development comprising of 12 commercial tenancies, 143 residential units and basement car parking'.

This consent achieved a FSR of 3.5:1.



FIGURE 1

Photomontage image of consent granted to Development Application No. 739/2014 for construction of an 11 storey mixed use development comprising 12 commercial tenancies and 143 residential units.

The assessment report presented to the Joint Regional Planning Panel concluded:

The Development Application has been assessed in accordance with the provisions of Section 79C of the Environmental Planning and Assessment Act, 1979 and the specific environmental planning instruments, including SEPP 55, SEPP 65, SEPP (Infrastructure), SEPP (BASIX), GMREP No. 2, BLEP 2001, Draft BLEP 2015 and the relevant parts of BDCP 2005. The application fails to comply in regards to front setback and building separation. However, the assessment of the development application has found that these variations are justified in the circumstances of this case, in the context of both the overall development and the surrounding locality.

This development has been physically commenced with excavation for the basement levels – see images below and over page.

Canterbury-Bankstown Local Environmental Plan 2023

- **Land use zone:** B4 Mixed Use
- **Permissibility:** Commercial premises and shop top housing are permissible with consent in the B4 Mixed Use Zone
- **Minimum lot size:** N/A
- **Building height:** 35 metres
- **Floor space ratio:** **3:1**
- **Additional Floor Space (Clause 6.29):** Subject to energy and water efficiency targets, a **bonus of 0.5:1 FSR is available**

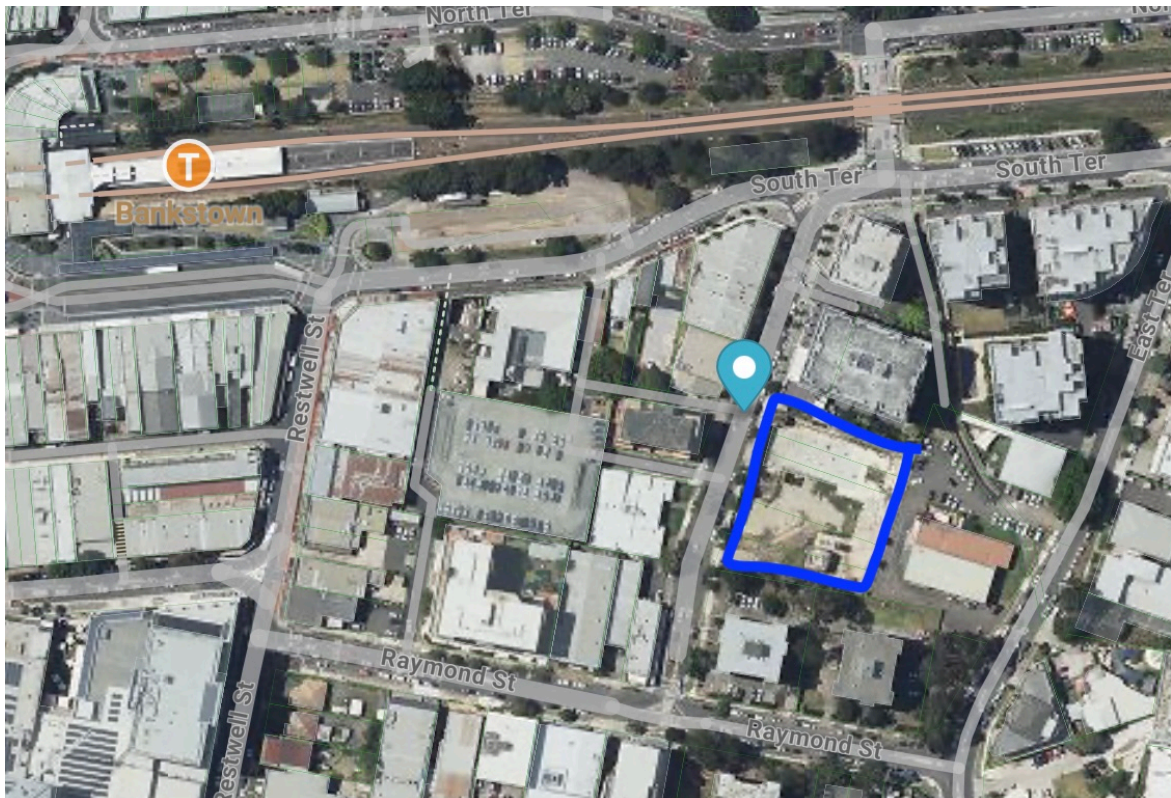
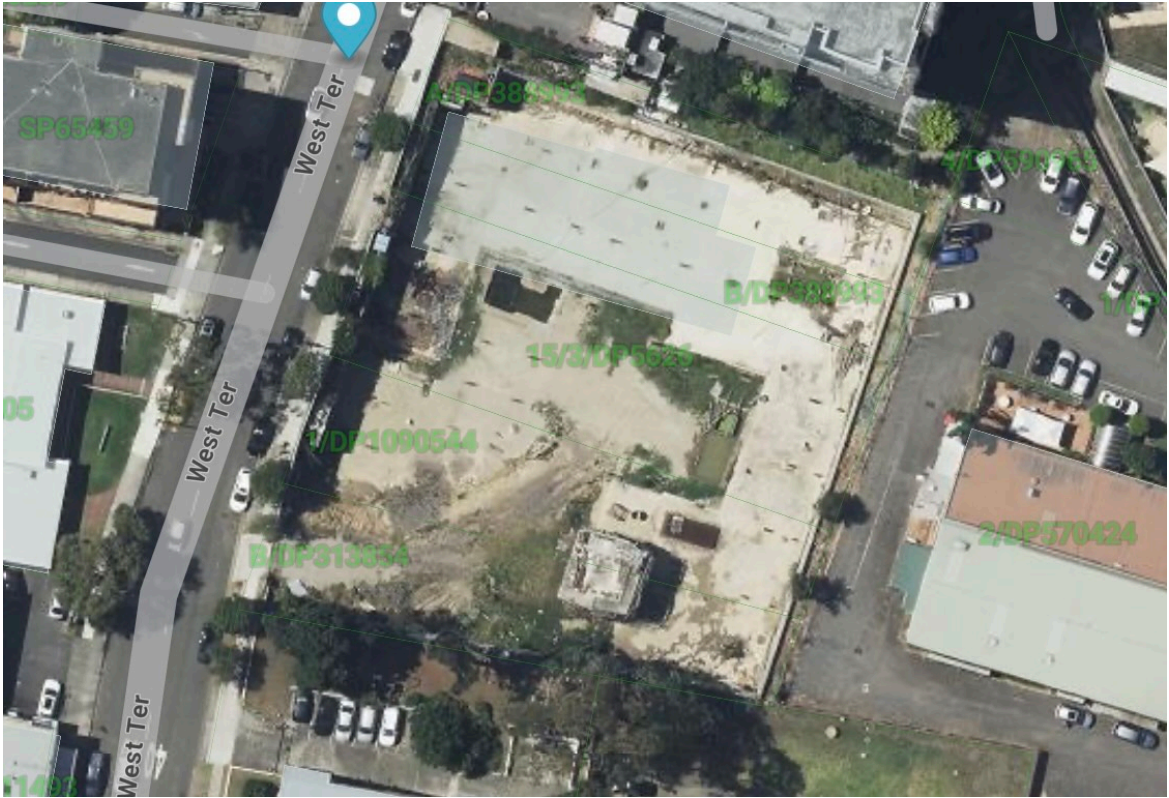


FIGURE 2

Aerial photograph identifying the subject site in proximity to the existing Bankstown Railway Station.



FIGURES 3 & 4

Aerial photograph identifying the subject site and its partially constructed basement (above), and photograph taken from West Terrace.



- **Land acquisition:** N/A
- **Heritage conservation:** N/A
- **Flood planning:** Formerly mapped as low risk.
- **Active street frontages:** N/A
- **Design Excellence:** The proposed development will be required to comply with this clause, however, a design competition is not required

State Environmental Planning Policy

- State Environmental Planning Policy (Housing) 2021 (see discussion below)
- State Environmental Planning Policy (Sustainable Buildings) 2022
- State Environmental Planning Policy (Transport and Infrastructure) 2021
- State Environmental Planning Policy (Resilience and Hazards) 2021

State Environmental Planning Policy (Housing) 2021

In addition to the maximum building height (35 metres) and FSR (3:1 + 0.5: sustainability bonus) development standards prescribed by the Canterbury-Bankstown Local Environmental Plan 2023, recent changes to SEPP (Housing) mean that a 'bonus' FSR up to 30% and equivalent building height could be achieved upon the site, subject to dedication of 15% of the total GFA as affordable rental housing for a period of 15 years, which would be managed by a community housing provider.

A potential maximum FSR of **4.55:1** and 45.5 metre building height could therefore be achieved through application of this policy, with 15% of GFA dedicated as affordable housing for a period of 15 years.

Bankstown City Centre Planning Proposal

In 2021, Council endorsed preparation and submission of a Planning Proposal to amend the Canterbury Bankstown Local Environmental Plan that implements the recently exhibited Bankstown City Centre Master Plan.

We note there were no proposed changes to the base FSR and height for the site (i.e. 3:1 and 35 metres). It was however proposed to introduce various incentive FSR and height standards:

- **Incentive floor space ratio:** 4.25:1
- **Sustainability bonus:** 0.5:1
- **Incentive building height:** 51 metres

The total potential FSR achievable upon the site would have been **4.75:1**, with a 51 metre maximum building height. The draft Planning Proposal suggested the intent of the incentive FSR and building height provisions were as follows:

*Provide incentive height and Floor Space Ratio (FSR) bonuses to deliver community facilities on certain sites, **3-4% affordable housing** or more than 50% of employment generating uses*

With application of 30% bonuses available under State Environmental Planning Policy (Housing) 2021, a FSR of **6.175:1** with a 66.3 metre maximum building height might have been achievable, with 15% of GFA dedicated as affordable housing for a period of 15 years.

However, at the Ordinary Meeting of Council on 27 February 2024, Council resolved as follows:

1. Notes the letter received from DPHI dated 2 February 2024, seeking that Council withdraw its Bankstown City Centre Planning Proposal.

2. Advises the DPHI that Council will further consider its request to withdraw once the NSW Government formally presents its draft plan that it proposes should supercede the Bankstown City Centre Planning Proposal currently before it.

3. Requests that the DPHI brief Council at multiple stages throughout the development of its Bankstown Accelerated TOD.

4. Throughout the DPHI Accelerated TOD process, prepare its own draft DCP for Bankstown City Centre and the matter to be reported back to Council for its further consideration following exhibition.

Transport Oriented Development

On 7 December 2023, the NSW Government announced the Transport Oriented Development (TOD) Program to create more well-located homes close to transport, jobs and services. As part of the TOD Program, the NSW Government identified eight tier one accelerated precincts across Sydney, centred on transport hubs for State-led accelerated rezoning to deliver up to 47,800 new, well located, high and mid-rise homes over the next 15 years.

The Bankstown Transport Orientated Development Precinct is one of the eight accelerated precincts that is expected to be rezoned by December 2024.

The Bankstown TOD rezoning proposal is now on exhibition for public feedback until 5pm Friday 30 August 2024.

Proposed changes to the principal development standards include:

- **Land use zone:** B4 Mixed Use (unchanged)
- **Building height:** 54 metres (54% increase)
- **Floor space ratio:** **4:1** (14% increase)
- **Additional Floor Space:** The Department has advised that there will be no further 'bonus' FSR available
- **Mandatory affordable housing contribution:** 3–10% for all new residential development in the Precinct, delivering affordable homes in perpetuity

And importantly, the attached Explanation of Intended Effect suggests:

Therefore, no additional affordable housing incentives are available within the Precinct, including the in-fill affordable housing floor space ratio and height of building bonuses under Chapter 2, Part 2, Division 1 of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP).

Under the new TOD provisions currently on exhibition, the site will achieve a maximum FSR of only 4:1 and maximum building height of 54 metres, and will require a mandatory affordable housing contribution of 3–10% (dedication in perpetuity or monetary contribution paid in lieu).

Feasibility Analysis (Height v FSR)

In the interest of understanding how the proposed draft planning controls would translate into built form and site yield, a Feasibility Study was prepared by Loucas Architects (see **Figures 5 & 6** over page).

The modelling was based upon an ADG compliant tower form (building separations, solar access, floorplates that encourage natural cross ventilation etc), using the 54 metre height control prescribed by the Explanation of Intended Effect, with setbacks informed by expected controls to be developed by Canterbury Bankstown Council and adopted in a Development Control Plan that has yet to be exhibited, and from queues taken in the Transit Oriented Development State Led Rezoning Urban Design Report, prepared by SJB for the Department.

These guidelines were developed to determine the relationship between potential building height controls and FSR.

The modelling illustrates that a FSR of 4:1 is a severely limiting factor that would result in stunted building heights that fail to achieve the BTOD desire to increase residential densities to provide much needed housing.

Furthermore, it is likely that if such a low FSR is imposed (an approximate 14% increase above current controls, where a 54% increase in building height is available), there would be little stimulus to encourage uptake of any future development opportunities created by the new scheme, and particularly by this significant site that has been dormant for almost 10 years.

The Loucas feasibility indicates that a FSR yield of approximately 5:1 could comfortably be achieved within the suggested building height standard when applying an ADG complaint design:

Complying Mass GFA calculation

$$\begin{aligned} \text{G} - \text{L3 (4 storey podium) floor plate area} &= 1,910 \text{ m}^2 - 15\% \text{ (balconies + lifts + stairs)} \\ &= 1,623.5\text{m}^2 \end{aligned}$$

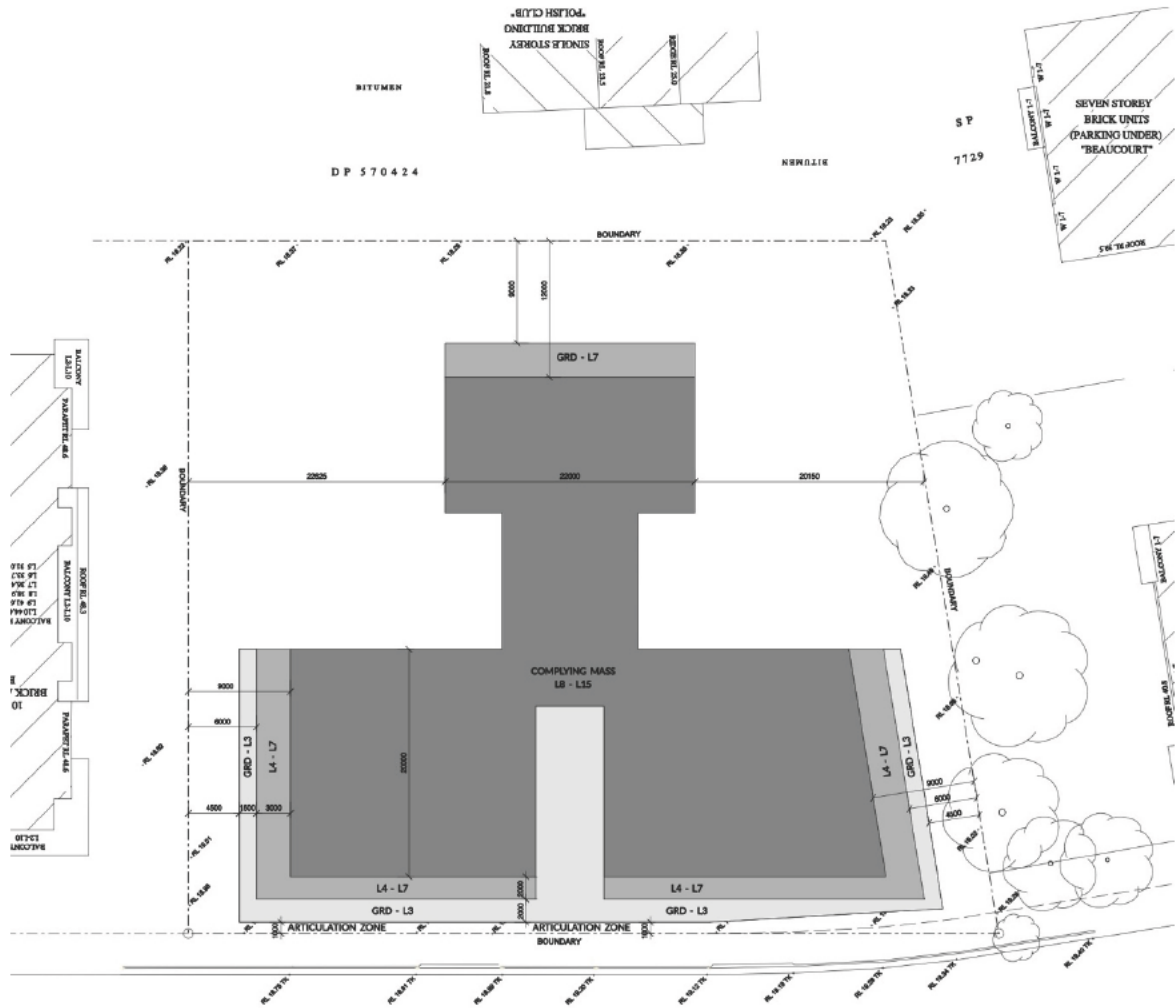
$$\begin{aligned} \text{L4} - \text{L7 (4 storeys) floor plate area} &= 1,630\text{m}^2 - 15\% \text{ (balconies + lifts + stairs)} \\ &= 1,385.5\text{m}^2 \end{aligned}$$

$$\begin{aligned} \text{L8} - \text{L15 (8 storeys)} &= 1,340 \text{ m}^2 - 15\% \text{ (balconies + lifts + stairs)} \\ &= 1,139 \text{ m}^2 \end{aligned}$$

$$\begin{aligned} \text{Total GFA} &= (4 \times 1,623.5) + (4 \times 1,385.5) + (8 \times 1,139) \\ &= 21,148 \text{ m}^2 \end{aligned}$$

$$\begin{aligned} \text{Site area} \\ &= 4,048 \text{ m}^2 \end{aligned}$$

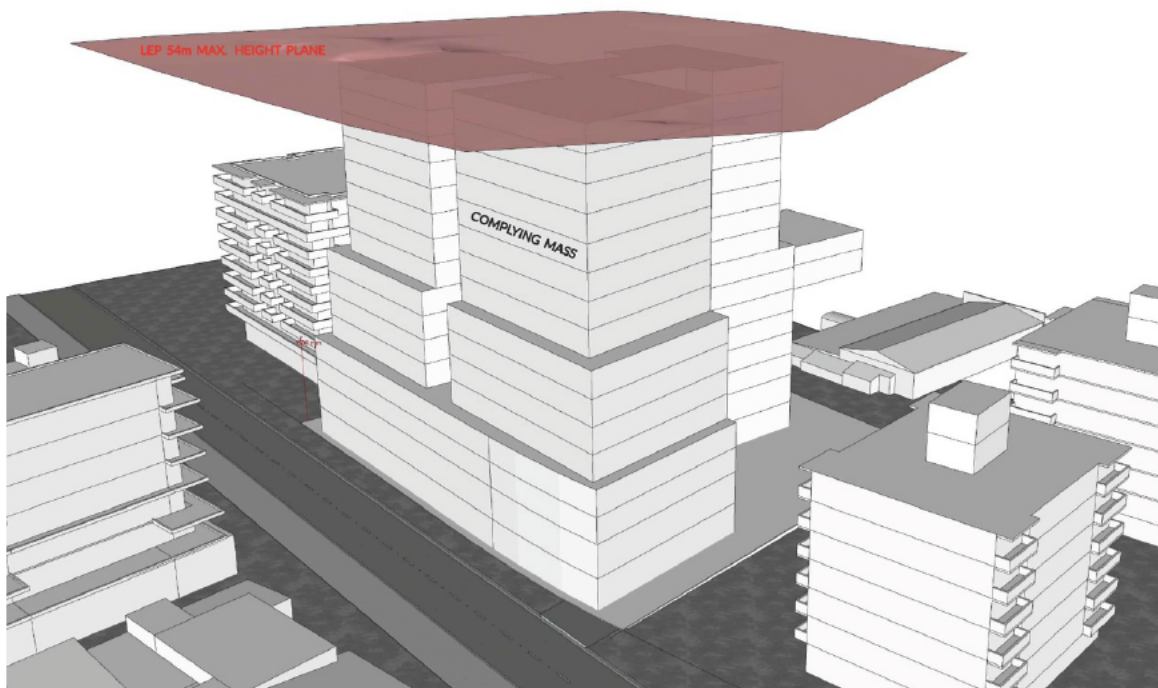
$$\text{FSR} = \mathbf{5.22: 1}$$



WEST TERRACE

FIGURES 5 & 6

Loucas Architects ADG compliant building envelope analysis.



Conclusion

This submission attempts to demonstrate that an ADG-compliant design with an increased FSR of 5:1 can be achieved, fully aligning with the BTOD objectives. Increasing the FSR in line with the height limit will enable the development of high-quality buildings that address housing shortages.

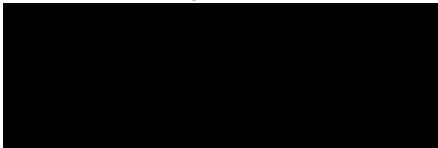
The submission advocates for development standards that not only meet but exceed best practices, fostering a vibrant, sustainable community and reducing reliance on motor vehicles. Ensuring that developments are not only high-quality and meet best practice standards is crucial for overcoming Sydney's housing shortage and achieving the goals of the BTOD but approved developments must also be financially viable to construct.

The proposed redevelopment of the subject sites in Bankstown represents a pivotal opportunity to create a vibrant, sustainable and economically viable community that not only aligns with but enhances the objectives of the BTOD precinct.

Our submission demonstrates a clear and compelling vision that seeks to maximize the potential of this significant site through carefully considered planning controls, increased FSRs, and innovative design solutions that address the growing housing demand, while ensuring that developments are both financially viable and exemplary in urban design.

We strongly urge the Department to consider the merits of our proposed increase in FSR, as supported by the Loucas Architects analysis. The current planning controls, as exhibited, risk producing suboptimal, financially unviable development that fall short of the BTOD's aspirations.

Yours sincerely

A large black rectangular redaction box covering the signature of the Director.

Director

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 4:19:51 PM
Attachments: [31-35-rickard-road-and-1-3-sir-joseph-banks-street-submission.pdf](#)

Submitted on Fri, 30/08/2024 - 16:19

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Costa

Last name

Dimitriadis

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 object to it

Submission file

[31-35-rickard-road-and-1-3-sir-joseph-banks-street-submission.pdf](#) (485.16 KB)

Submission

Please see attached submission prepared by Ethos Urban on behalf of the landowners at 31-35 Rickard Road and 1-3 Sir Joseph Banks Street, Bankstown.

I agree to the above statement

Yes

30 August 2024

Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure

Attention: Laura Locke (Director, Metro East and South Planning, Land Use Strategy and Housing)

Dear Laura,

**Submission to the Rezoning Proposal for the Bankstown Transport-Oriented Development Precinct
On behalf of landowners of the sites at 31-35 Rickard Road and 1-3 Sir Joseph Banks Street, Bankstown**

This submission has been prepared by Ethos Urban on behalf of the landowners at 31-35 Rickard Road and 1-3 Sir Joseph Banks Street, Bankstown (the site) in response to the exhibition of the Department of Planning, Housing and Infrastructure's (**Department**) State-Led Rezoning for the Bankstown Transport-Oriented Development (**TOD**) accelerated precinct rezoning proposal. This submission has been prepared in the context of the landowners' 2,201m² consolidated site, shown in **Figure 1** which represents a highly visible opportunity site that would contribute to the revitalisation of the Bankstown City Centre in accordance with the TOD objectives.

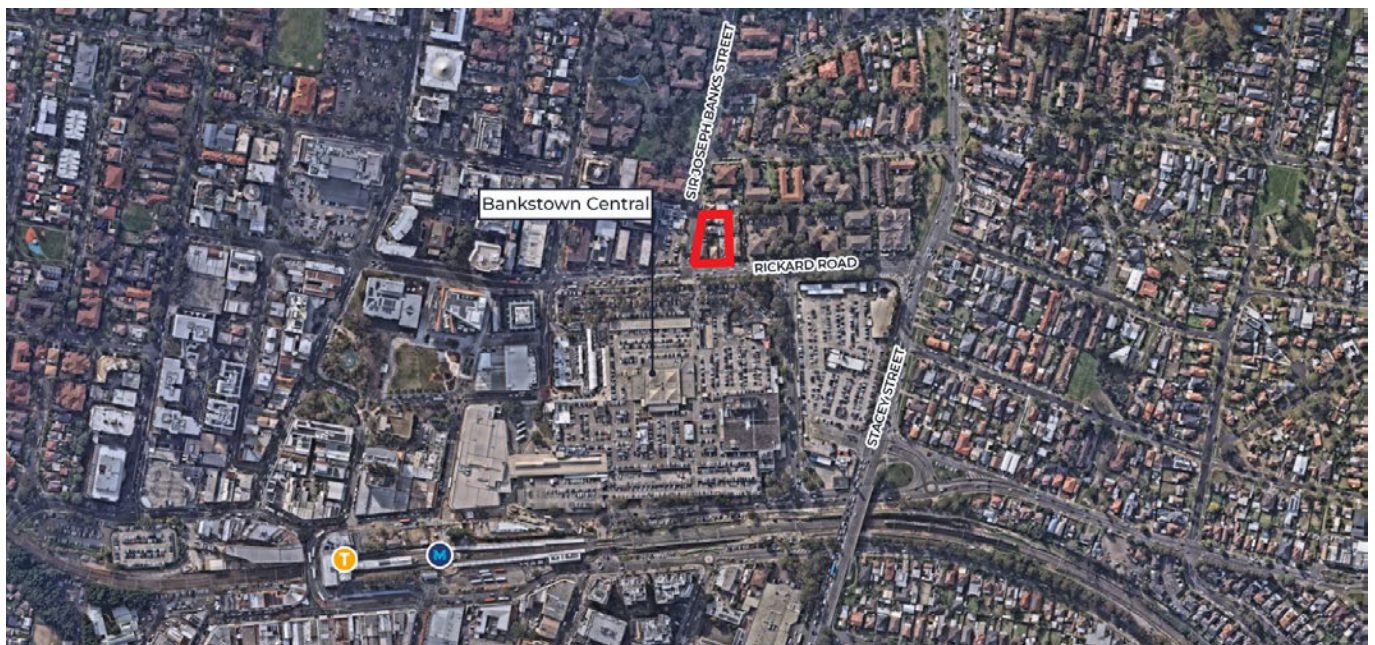


Figure 1 Plan indicating the location of the site in the context of Bankstown City Centre

Source: Nearmap and Ethos Urban

The joint landowners of the site are broadly supportive of the intention to rezone Bankstown City Centre as part of the TOD Program to facilitate the delivery of housing in close proximity to Bankstown railway station and the future Bankstown metro station, however would like to **object to the proposed rezoning proposal** on the basis of the site-specific controls applied to the site.

The **landowner group wish to make two key recommendations** which support the revitalisation of the opportunity site at 31-35 Rickard Road and 1-3 Sir Joseph Banks Street, Bankstown in the short term, in accordance with the TOD objectives. Further details of the requests are provided over the page.

Recommendations for 31-35 Rickard Road and 1-3 Sir Joseph Banks Street, Bankstown

1. Increase the maximum height of buildings for the site from 30m to 55m.

The site is situated directly adjacent to the east of the Rickard Road McDonald's site which has been provided with a proposed height of 55m and to the north of the Bankstown Central Shopping Centre site which includes a height of 50m. The subject allotments also form a prominent corner site on the key east-west gateway and key linkage into Bankstown City Centre, along Rickard Road. From an urban massing point of view, by matching the height of the McDonald's site, this would provide a consistent massing form.

Further, the site is located less than 500 metres from the future Bankstown Metro station, which is a similar distance as some sites along Meredith Street which have been afforded with heights of up to 78m. It is noted that the Bankstown City Centre Master Plan developed by the City of Canterbury-Bankstown Council, and which was informed by significant master planning also envisaged a greater density on the site of 14 storeys.

It is therefore recommended that the maximum building height of 30m proposed for the site is increased to 55m to align with the height proposed for the McDonald's site adjacent to the site and to create a consistent streetscape character and urban massing approach in the northern section of the Bankstown CBD.

2. Increase the maximum floor space ratio (FSR) for the site from 2.5:1 to 4:1.

Similar to the rationale provided above with relation to the maximum height of buildings provision, the site is located adjacent to allotments which are afforded maximum FSR of 4:1, namely the Rickard Road McDonald's site. The site shares an equally prominent corner position along Rickard Road, and therefore is well-placed to contribute a significant development to this important east-west gateway into Bankstown City Centre. The nominated maximum FSR of 2.5:1 for the site does not provide a residential density outcome which is considered conducive for the viable redevelopment in the short term.

An increase in the site's FSR from 2.5:1 to 4:1 will provide this opportunity site with a viable density in order to realise a residential mixed use development with affordable housing and active ground floor uses, in accordance with the objectives of the TOD Program. On the basis of the aforementioned points, it is recommended that the maximum FSR for the site is increased to 4:1, consistent with the FSR nominated for the McDonald's site adjacent to the site, and to also create a consistent streetscape relationship on this key corner.

The landowners thank the Department for the opportunity to provide a submission in response to the exhibition of the Department's rezoning proposal for the Bankstown TOD precinct. The landowners are available to meet and discuss the contents of this submission and welcome any further opportunities to work collaboratively with the Department in contributing to the TOD finalisation.

Should you wish to discuss the contents of this submission, please contact the undersigned.

Yours sincerely,



Costa Dimitriadis
Senior Urbanist, Planning

[Redacted contact information]



Daniel Howard
Associate Director, Planning

[Redacted contact information]

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 4:23:28 PM

Submitted on Fri, 30/08/2024 - 16:23

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████████

Last name

██████████

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

Yes

Info

Email

██

Suburb/Town & Postcode

2213

Submission

I support the increase in density of housing and jobs around Bankstown Station. Providing housing and jobs near transit allows for easy access to opportunities and a dynamic economy.

Traffic is a key concern. I ask the plan aim to increase the amount of pedestrian space and remove cars from streets. Public and active transport is the best focus for a high density area like Bankstown. Additionally, parking requirements should be reduced or removed.

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 4:23:30 PM
Attachments: [cwh-submission_bankstown-tod-rezoning-proposal---20240830.pdf](#)

Submitted on Fri, 30/08/2024 - 16:22

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

Pymont NSW 2009

Please provide your view on the project

I support it

Submission file

[cwh-submission_bankstown-tod-rezoning-proposal---20240830.pdf](#) (4.25 MB)

Submission

See Attached Submission from City West Housing. Thank you for taking the time to consider.

Regards

City West Housing

I agree to the above statement

Yes



30 August 2024

Ms Laura Locke
Director
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Dear Ms Locke,

SUBMISSION TO THE BANKSTOWN TOD REZONING PROPOSAL

I am writing on behalf of City West Housing (CWH) to provide feedback on the Bankstown TOD rezoning proposal outlined in the Explanation of Intended Effect for the Bankstown TOD Precinct, July 2024.

We welcome the opportunity to engage with the NSW Department of Planning, Housing and Infrastructure (the Department) on these important changes in relation to the delivery of affordable housing in NSW.

CWH is an independent not-for-profit and registered Tier 1 housing provider of affordable rental housing in Sydney. CWH plays its part in addressing the enormous demand for affordable housing in Australia's biggest and most challenging housing market. By charging affordable rent, CWH supports residents on very low to moderate incomes to live near their work, contributing to the economy and their local communities.

CWH has a strong track record of working with partners to build quality, innovative and economic design that enhances resident wellbeing, creates a sense of community belonging, and optimises the lifecycle of their assets. CWH has been successful in delivering medium density affordable housing throughout Pyrmont, Ultimo, Glebe, Forest Lodge, Eveleigh, Zetland and Alexandria. CWH currently owns properties for future development in TOD precincts including a 4,300 sqm site at 30-34 Sir Joseph Banks Street, Bankstown.

As a Tier 1 CHP in NSW, CWH are heavily involved in the delivery of medium density affordable housing in NSW. We strongly support the Department in making changes to better support the provision of affordable housing across NSW through the changes proposed to the Housing SEPP and Planning Systems SEPP and we welcome the intent of these changes. This submission outlines some key concerns CWH has identified in the proposed changes generally, and in particular the site owned by CWH at 30-34 Sir Joseph Banks Street, Bankstown.

CWH OBSERVATIONS AND RECOMMENDATIONS

The EIE states that the objectives of the rezoning proposal for the precinct 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; and

- Consider the vision and objectives of the Canterbury Bankstown Council (Council) adopted Bankstown City Centre Master Plan.

CHW supports the renewal of the Bankstown Accelerated TOD Precinct to deliver more homes, including more affordable homes, within walking distance to public transport and services. However, there are some concerns and clarifications required in relation to the proposed changes in relation to our site at 30-34 Sir Banks Street, Bankstown, and we are concerned the proposal may not realise the full potential of the site to deliver affordable housing.

In particular, CWH has identified the following proposed changes which affect the site and potential delivery of affordable housing:

1. Proposed Planning Controls – for 30-34 Sir Joseph Banks Street, Bankstown

Floor Space Ratio

The proposed FSR for the site is 2:1. CWH supports this FSR as a minimum FSR control for the site; however, detailed testing (particularly solar analysis to RM Campbell Reserve) has previously been undertaken by DKO Architects to consider the development potential of the site, with the aim to increase opportunities for affordable housing. Refer to **Attachment A**.

This analysis demonstrates that a FSR of 2.3:1 could be achieved on the site, with excellent design outcomes, minimal overshadowing to RM Campbell Reserve and minimal impact on neighbours.

Critically, an FSR of 2.3:1 would deliver more affordable housing on the site. **CWH recommends** that:

- Large, consolidated sites be reviewed for potential increased capacity to deliver housing.
- An FSR of 2.3:1 is applied to the site at 30-34 Sir Joseph Banks Street, Bankstown to facilitate increased affordable housing on the site

Height of Buildings and Storeys

The proposed building height for the site is 23 metres. As outlined in **Attachment A** prepared by DKO, testing of the site indicates that a height of up to 30 metres could be achieved on some parts of the site with minimal overshadowing of the neighbouring residential buildings or RM Campbell Reserve.

The analysis previously prepared by DKO considered the maximum reasonable affordable housing outcome on the site, while maintaining adherence to the principles in the adopted Bankstown Master Plan and the Apartment Design Guide.

The analysis by DKO confirmed that additional height can be accommodated on the site, while maintaining minimum of 4 hours to 50% of RM Campbell Reserve in mid-winter, consistent with the draft Urban Design Framework, and achieving an outcome consistent with existing and desired future character. The draft Urban Design Framework to support the rezoning proposal recommends a height of 1-6 storeys for the site (section 7.2). The site is also in a recommended residential land use area. The proposed height in storeys does not correspond with the proposed maximum building height control. With the required 3.2 metre floor-to-floor height, at least 7 storeys are achievable with the 23 metre height limit.

CWH recommends that:

- The maximum height of buildings control be the ultimate planning control for the site which is up to 30m as demonstrated in **Attachment A**.

- Ensure the proposed height in storeys in the Urban Design Framework aligns with the proposed building height control. A minimum of 7 storeys can be achieved on our site under the proposed height control of 23 metres.
- Remove the requirement for increased ground level floor-to-floor heights which are not required for buildings that have a residential zoning.

2. Removal of In-Fill Affordable Housing Bonuses and SSD Pathway in TOD Precincts

The previously exhibited EIE for proposed pathway changes to support TOD precincts proposed to exclude the TOD Accelerated Precincts from the in-fill affordable housing provisions in Chapter 2 of the Housing SEPP. This means the bonus height and floor space provisions for affordable housing will not apply to development in the Bankstown Accelerated Precinct

It also means that development in the Bankstown Precinct would be excluded from the associated affordable housing SSD pathway under Clause 26A of the Planning Systems SEPP. The in-fill affordable housing SSD pathway under Clause 26A of the Planning Systems SEPP is available where development utilises the affordable housing bonus provisions in the Housing SEPP.

There is concern that this removes the SSD pathway for affordable housing development in the Bankstown Precinct – even when development may deliver substantial affordable housing. CWH are also concerned that there is no incentive or uplift for development that delivers significant affordable housing above the minimum requirements. CWH is concerned that a blanket exclusion to the affordable housing bonuses will significantly reduce the capacity for affordable housing in key areas and does not align with the demonstrated capacity of our site to deliver affordable housing

Our previous submission to the Department, and testing undertaken by DKO demonstrates the site has additional capacity for housing than proposed in the Bankstown TOD rezoning proposal. As outlined in Item 1 above (and demonstrated in **Attachment A**), the site has capacity to accommodate an FSR of 2.3:1 and a height of up to 30m without any unacceptable impacts and remaining consistent with the desired future character for the Precinct. We also note that the Urban Design Framework implies that the site is a strata scheme with multiple owners. We wish to confirm that the site in under single ownership CWH is prepared to redevelop for affordable housing. There is a need to ensure that existing incentives and bonus provisions to increase affordable housing in highly accessible locations are not unnecessarily turned off. The proposed exclusion of affordable housing bonuses and associated SSD pathway has the potential to impact the amount of affordable housing delivered in the Bankstown Precinct. We believe that removing the Housing SEPP bonus will reduce the provision of affordable housing and is not consistent the demonstrated capacity of our site to deliver more affordable housing.

We are concerned that if the affordable housing bonus under the Housing SEPP bonus is switched off, there is a missed opportunity to provide more affordable housing in an extremely well-serviced and accessible location. If the Housing SEPP bonus is to be excluded for the Bankstown Precinct, the Department must ensure that the proposed planning controls allow the maximum development capacity of the site.

Recommendation

- Remove the proposed exemption to the affordable housing provisions in Chapter 2 of the Housing SEPP to ensure there is no impact on the potential to deliver increased affordable housing in the Bankstown Precinct, particularly at 30-34 Sir Joseph Banks Street, Bankstown.

- At a minimum, consider retaining the affordable housing bonus provisions under the Housing SEPP for CHPS's in the Bankstown Precinct.
- If the Housing SEPP bonus provisions are to be switched off for the Bankstown Precinct, at a minimum the proposed planning controls for the site at 30-34 Sir Joseph Banks Street, Bankstown must allow for the full development potential of the site to deliver affordable housing (this is a proposed FSR of 2.3:1 and height of 30m as demonstrated in Attachment A).
- The SSD pathway for in-fill affordable housing should continue to apply to affordable housing developments in the TOD Accelerated Precincts. The proposed SSD pathway for the TOD Accelerated Precincts is temporary and should not replace the existing SSD pathway available for affordable housing development.
- Ensure there is a permanent SSD pathway available for affordable housing developments in the TOD Accelerated Precincts.

3. Affordable Housing

It is proposed to amend the Canterbury-Bankstown LEP to include a clause that will require all new development to contribute to the provision of affordable housing. Affordable Housing contributions of 3-10%, to be help in perpetuity and to be managed by a registered Community Housing Provider, are to be proposed as mandatory for all new residential development within the Precinct.

As a registered Community Housing Provider, City West Housing is keen to understand more about how the scheme will work.

The final paragraph in section 2.5 of the EIE refers to a "levy". It is currently unclear whether developers will be required to provide a monetary contribution, or to dedicate completed apartments. It is also unclear how the range of 3 to 10 percent will be applied.

CWH recommends that:

- Clarity be provided as to the form the contribution will take.
- More information be provided as to how the range of 3 to 10 percent will be applied.
- Community Housing Provider developers be exempt from any affordable housing monetary contributions.

City West Housing would welcome the opportunity to meet with the Department and Council to discuss how the contributions would be collected and managed to deliver affordable housing in the precinct

4. Design Excellence

The existing Bankstown LEP contains Design Excellence provisions at section 6.15 relating to certain types of development (including residential over 4 storeys). The Department is investigating ways to strengthen design excellence in the precinct, which may include changes to LEP section 6.15.

CWH welcomes clarification and simplification of design excellence processes to reduce the time, resources and costs associated with design competitions and multiple design review panels.

CWH recommends that a more clarification be provided on the proposed changes to the design excellence process to enable suitable feedback.

5. Local Contributions

Section 7.11 and 7.1 contributions will apply to developments in the precinct, likely based on the *Canterbury-Bankstown Local Infrastructure Contributions Plan 2022*.

CWH recommends that Community Housing Provider developers be exempt from or given a discount on the contributions to reduce the financial impact on Housing Providers and to enable the delivery of more affordable housing.

Thank you for the opportunity to provide comment on the proposed changes.

Yours sincerely,

[Redacted signature]

[Redacted name]

Head of Development

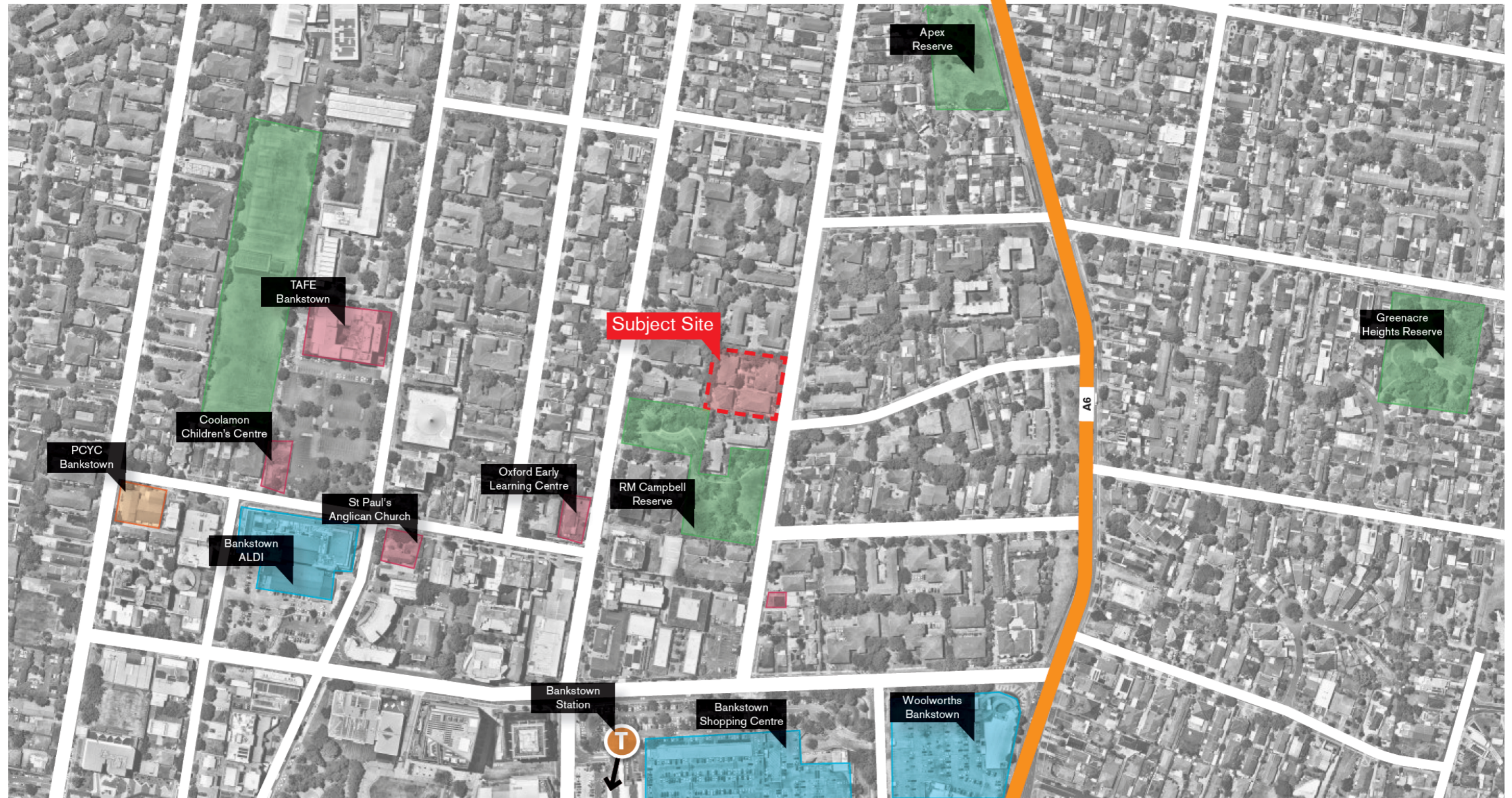
[Redacted contact information]

Attachments:

Attachment A: Capacity study for 30-34 Sir Joseph Banks Street, Bankstown prepared by DKO Architects

THE SITE

- Site
- Commercial
- Education/Cultural
- Public Open Space
- Public Building



HEIGHT LIMIT

PROPOSED BANKSTOWN MASTERPLAN

New Areas within 200m Walking Distance of Publicly Accessible Open Space

Bankstown Height Map

Maximum Building Height (m)

B	3.7	U1	30
I	8	U2	32
J	9	V1	35
K	10	V2	38
L	11	V3	39
L2	11.5	W	41
M	12	W3	45
N1	13	X	47
N2	14	X2	48
O	15	Y1	51
P	17	Y2	53
O1	19	Z	58
O2	20	A1	61
R	21	AA1	65
S	23	AA2	67
T1	25	AA3	73
T2	26	AB	86
T3	29	AB1	81



FSR

PROPOSED BANKSTOWN MASTERPLAN

Maximum Floor Space Ratio (n:1)

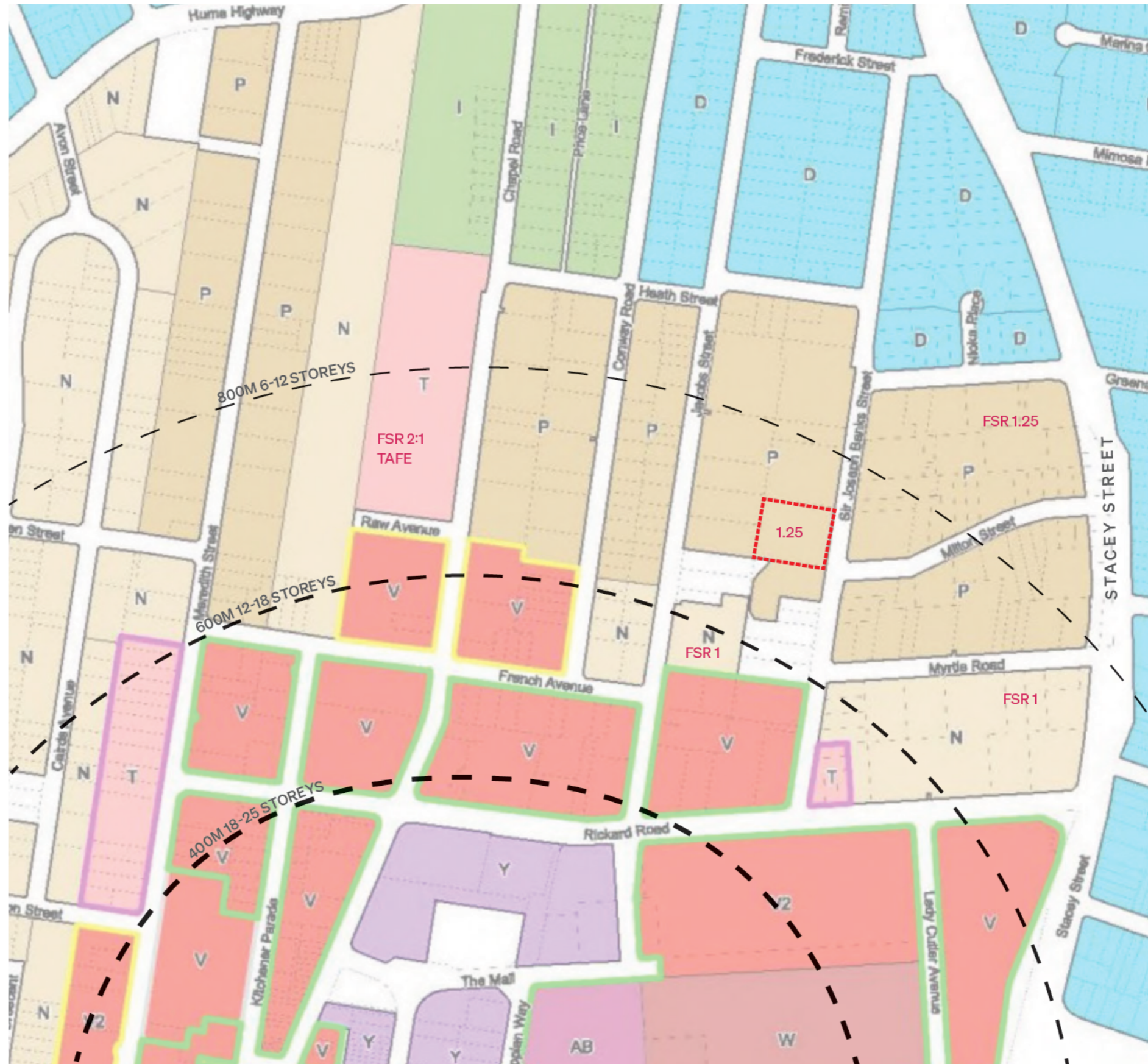
D	0.5
F	0.7
H	0.75
I	0.8
L	0.9
L2	0.95
N	1
N2	1.15
NS	1.2
P	1.25
R	1.4
S1	1.5
S2	1.65
S3	1.75
T	2
T2	2.15
U	2.5
U2	2.75
V	3
V2	3.25
W	3.5
Y	4.5
AB	7

FSR Area

Area 1	Blue outline
Area 2	Purple outline
Area 3	Green outline
Area 4	Yellow outline
Area 5	White outline
Area 6	Orange outline
Area 7	Cyan outline

Cadastre

Cadastre 06/08/2021	Grey outline
© Canterbury - Bankstown Council	Black outline



OPPORTUNITIES

SITE ANALYSIS



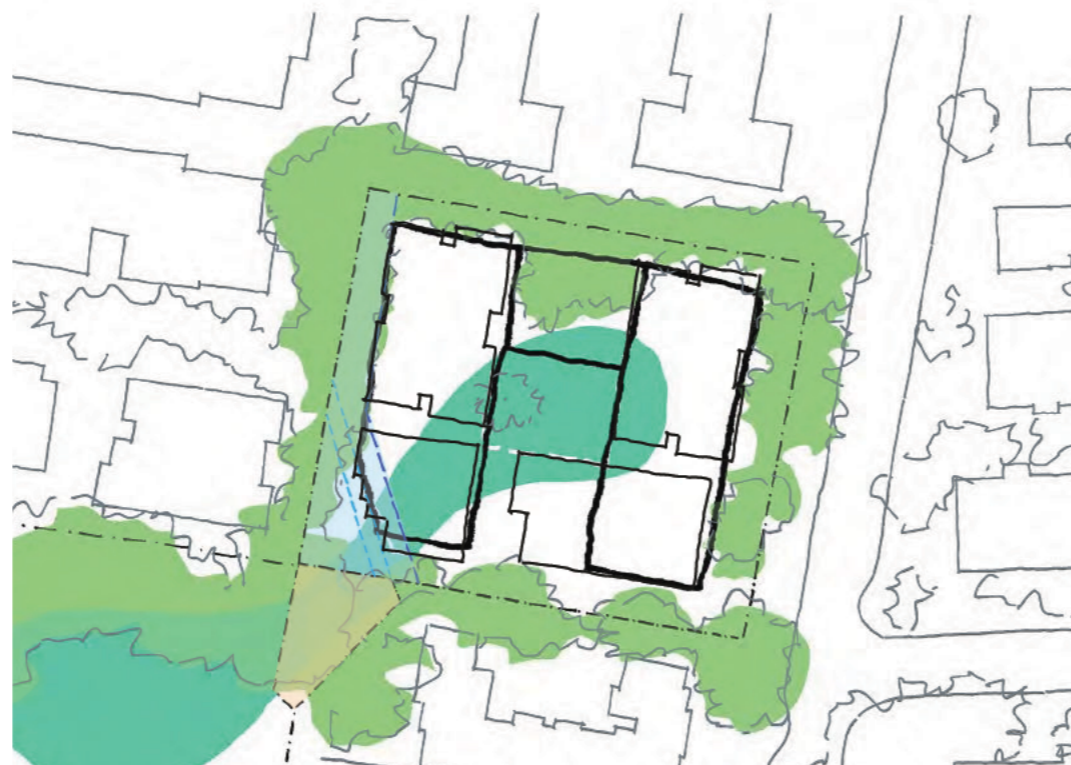
Current built form - tree retention

NB: Arborist report required
Possible footprint analysis

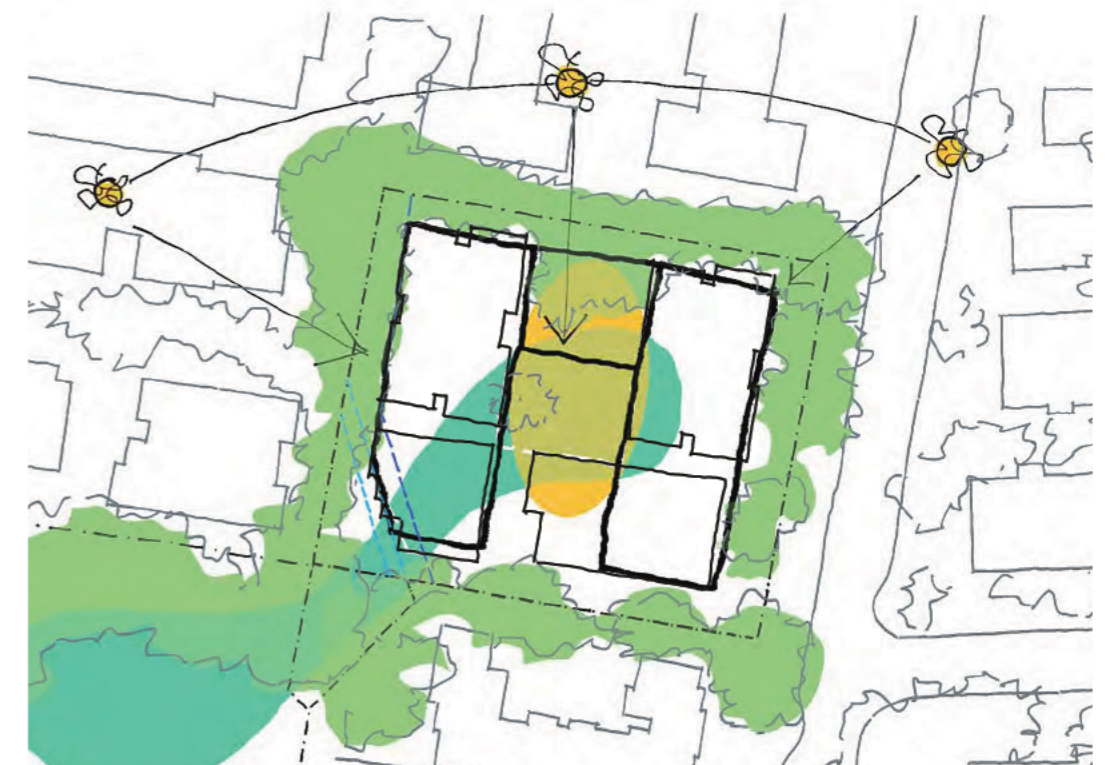


Possible built form location for tree retention

NB: Arborist report required
Possible footprint analysis



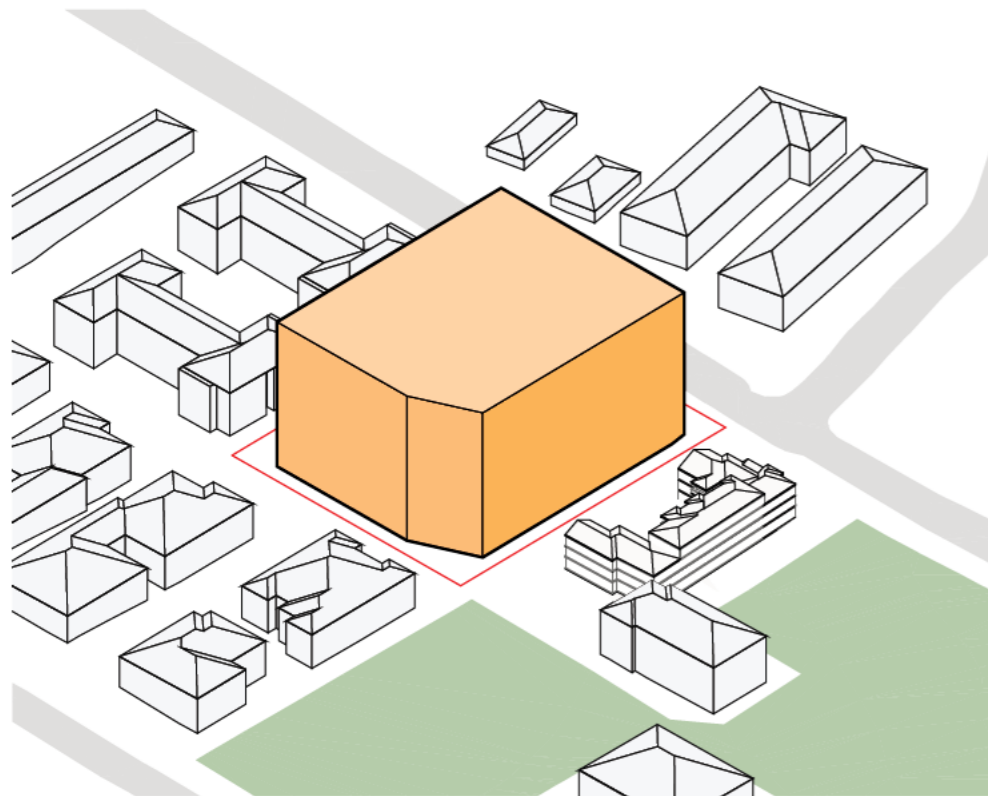
Extending the park



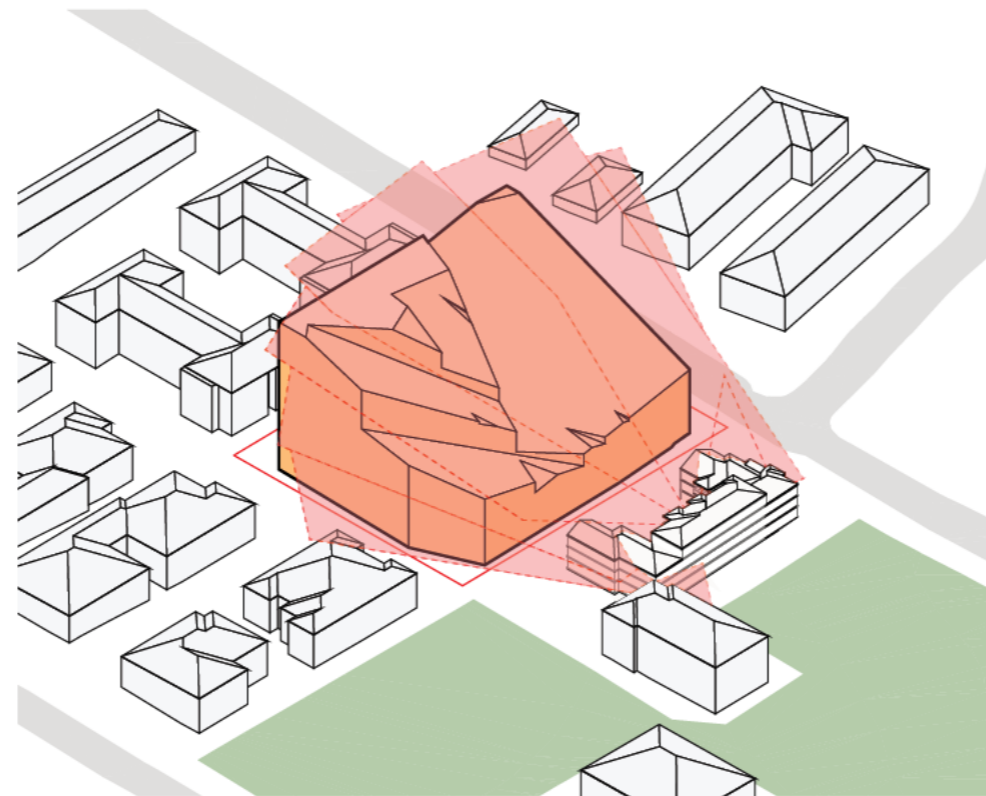
Communal green gathering space - deep soil
Solar access to apartments
Solar access to existing southern neighbour

ENVELOPE EVOLUTION

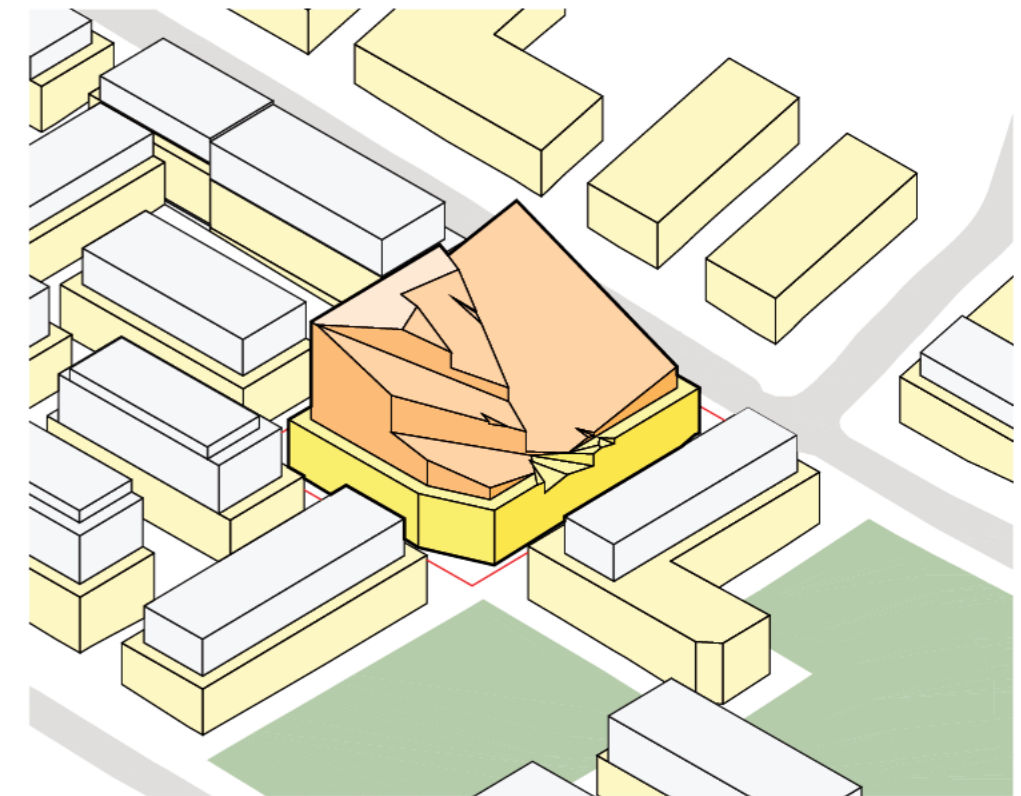
STUDY OF CONSTRAINTS



Max envelope of 12 storeys as per Bankstown Masterplan



Carving massing envelope based on solar planes to main constraint (solar to southern neighbour)



Adopting a 4 storey street wall in line with the proposed future character highlighted in Bankstown Masterplan

PROPOSED SCHEME

EXISTING CONTEXT VIEWS

PROS

- North-South orientation allows for more solar amenity to apartments and courtyard
- Minimises solar impact to southern neighbour as it is modelled to solar planes at given times
- Opportunity for diverse rooftop spaces

CONS

- Multiple different floor plates, inefficiencies with planning
- Perceived bulk from Sir Joseph Banks St

Axo View (Future Context)



Sir Joseph Banks St - looking north (Existing Context)



Sir Joseph Banks St - looking south (Existing Context)



RM Campbell Reserve - looking north (Existing Context)



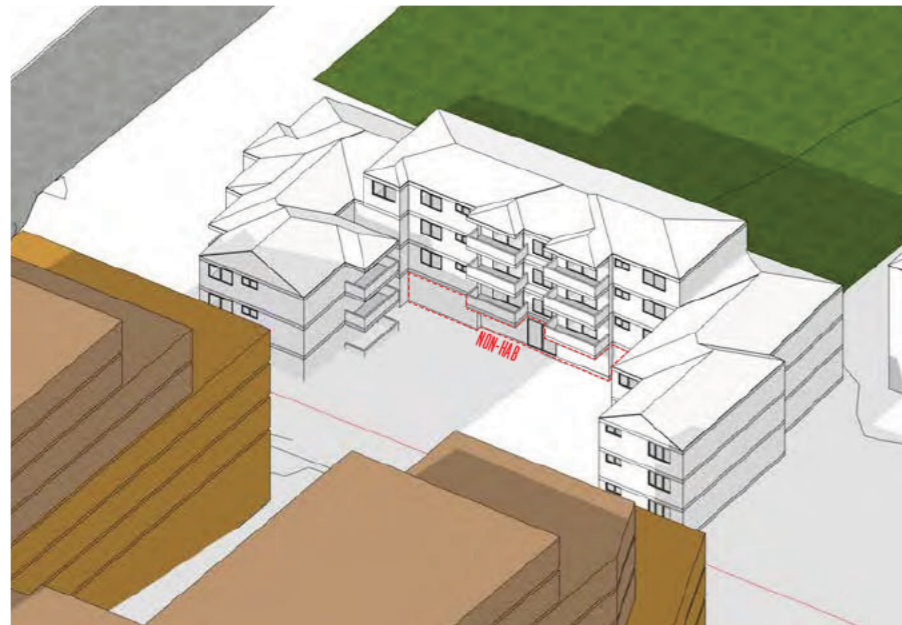
CONSOLIDATED SITE TOTALS:

Site Area: 4,319 m²
Total GFA: 9,925 m²
FSR: 2.30:1

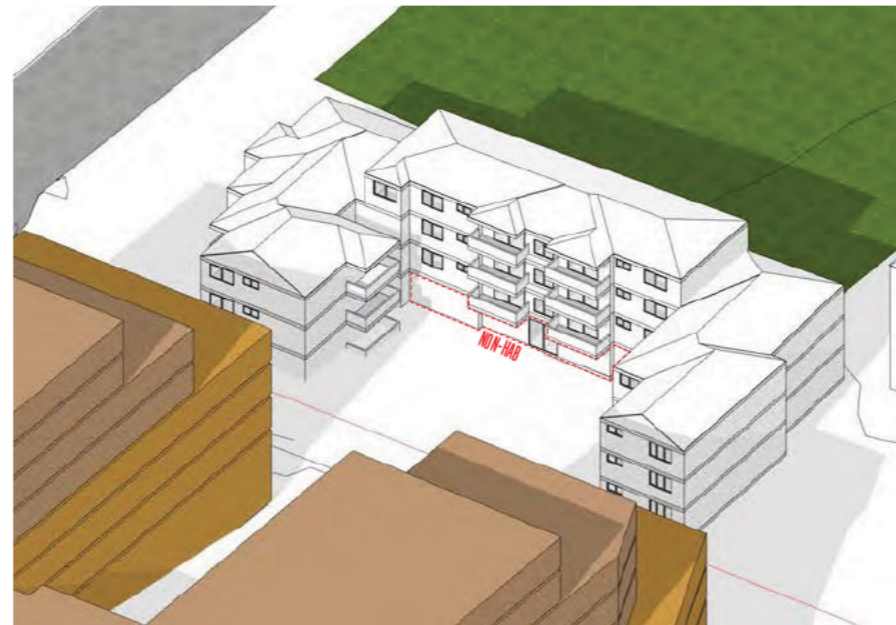
Total Units: 134

PROPOSED SCHEME

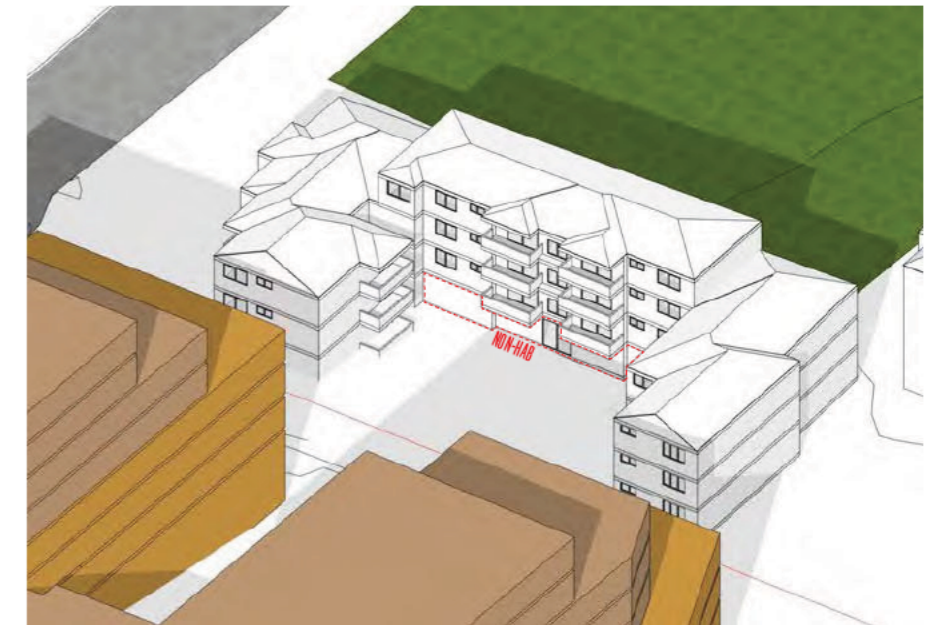
SHADOWS AFFECTING NEIGHBOUR EXISTING/FUTURE CONTEXT COMPARISON AT 11AM-1PM JUNE 21



21 June - 11am Existing Context 1:500



21 June - 12pm Existing Context 1:500



21 June - 1pm Existing Context 1:500

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 4:24:05 PM

Submitted on Fri, 30/08/2024 - 16:23

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

██████

Last name

██████

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

Yes

Info

Email

██

Suburb/Town & Postcode

Bankstown

Please provide your view on the project

I object to it

Submission

Dear DPHI,

I am reaching out to raise my objections to the Bankstown TOD masterplan, which I feel overlooks several important considerations for our area.

Increased density enables the development of mixed-use projects that combine residential, commercial, and recreational spaces. This approach fosters a more integrated and dynamic community where residents have convenient access to a variety of services and amenities. Higher density is essential for supporting these types of developments and creating vibrant, walkable neighbourhoods.

Mixed-use developments contribute to more efficient land use by combining different functions within the same building or area. This reduces the need for extensive land

acquisition and minimises the environmental impact of development. Promoting mixed-use development through higher density aligns with sustainable urban planning principles and supports the creation of more resilient communities.

Moreover, mixed-use developments enhance the overall quality of life for residents by providing diverse living, working, and recreational options in close proximity. This can lead to a more engaging and satisfying urban experience, making the area more attractive to potential residents and businesses. Higher density is a key enabler of this comprehensive urban design strategy.

The construction industry is currently facing significant economic challenges due to rising material and labour costs. To make construction projects more financially feasible, it is essential to ensure that they are of sufficient scale. Higher-density developments provide the necessary economies of scale to offset these increased costs, making projects more viable for builders and developers.

Larger, high-density projects are more likely to attract investment and funding, as they offer a greater return on investment compared to smaller-scale developments. This can help alleviate the financial pressures on construction companies and support the continued growth and development of the industry. By increasing density, we can create more opportunities for builders and ensure that construction projects remain economically viable.

Additionally, higher-density developments can lead to the creation of more affordable housing options, which can help address some of the challenges facing the construction industry. By addressing both housing needs and construction challenges simultaneously, we can support a more balanced and sustainable approach to urban development.

Existing walk-up apartments and lower-density developments in the Bankstown TOD area currently constrain further redevelopment and limit the overall housing supply. Increasing density is essential for optimising land use and unlocking the full redevelopment potential of the site. Higher-density development allows for a more efficient use of land, accommodating more housing units and amenities within the same footprint.

By increasing density, we can address the constraints imposed by existing developments and create more opportunities for growth and improvement in the area. This approach can help alleviate the housing shortage and contribute to a more dynamic and sustainable urban environment. Optimising land use through higher density is crucial for achieving the full potential of the Bankstown TOD precinct.

Additionally, higher density can facilitate the revitalisation of underutilised or outdated areas, leading to the creation of more vibrant and attractive neighbourhoods. This can enhance the overall appeal and functionality of the Bankstown TOD precinct, making it a more desirable location for residents and businesses. Addressing these redevelopment constraints through increased density is essential for fostering a more resilient and adaptable urban environment.

I strongly urge the Department to reconsider the proposal and advocate for a higher density uplift. This adjustment is critical for leveraging the full potential of the area, addressing our housing needs, and supporting local economic development. Thank you for your attention to this matter. I look forward to your response and a positive revision of the proposal.

Yours sincerely,



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 4:24:38 PM
Attachments: [response-to-tod-and-master-plan.docx](#)

Submitted on Fri, 30/08/2024 - 16:24

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████

Last name

██████

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

Yes

Info

Email

██

Suburb/Town & Postcode

Padstow

Please provide your view on the project

I object to it

Submission file

[response-to-tod-and-master-plan.docx](#) (16.27 KB)

Submission

RESPONSE TO TOD and Master Plan IN REVIEWING OUR CITY'S COMMUNITY STRATEGIC PLAN

This is a criticism that I'm sure will not go down too well with council but it is not to be taken personally, it is more directed at process and to be considered by a wider outside audience – including sitting local MPs for State & Federal Parliament respectively, who will be Cc'd this email. First I will make comment on the Masterplan – its presentation to council and question if councillors know what they're looking at. Secondly, I would like to pass on observations regarding the recent Stacey St upgrade and what that has achieved compared with what the multiplication of Bankstown CBD's population (as suggested in

the Masterplan) would require.

Comprehensive report and council vote.

Unfortunately there is no real prerequisite to qualify for entry into politics whether it be local, state or federal, and yet it is these people we hand over power to, to make important decisions on behalf of their constituents (and particularly with some Federal Govt reps around the world you would think that at least a simple IQ test might be a good idea? A few names come to mind).

A case in point could be a fairly naive & amateurish attempt commissioned by CB Council to advise on Bankstown CBD's future. This is not a judgement on the statistics or investigation in the report, but moreso on the resulting artist's rendering that was produced to sum up what the CBD would look like in decades to come. Those images would seem very fanciful and perhaps doing a disservice to the rest of the report which does acknowledge the very important community need for open space. In town planning involving high density living, there is a trade off between open space and high rise building, the former contributing to the health & well being of those who live there. It is one thing to 'wish it,' but another to be within the realm of possibility.

For the CB City Masterplan which would basically determine the future of the CB district (which is the most populous LGA in the state) for decades to come, a very comprehensive 145 (or thereabouts) page report was commissioned by the council to be debated and voted on by councillors - which they apparently did, in the affirmative. The final 'conclusion and/or recommendation' in the report was represented by an artist's rendering of the proposed CBD which looked more like a combination of Sydney's Hyde Park and New York City's Central Park - but possibly with even more high density living surrounding than both. The proposal in that representation is floored because there is no way that the elements shown in that rendering could possibly happen within the confines of Bankstown and yet it had the tick of approval by councillors. It would be very interesting to test councillors on how much of the report was read and indeed how much was understood. For them to sign off on such a significant issue without probing the authors as to how such a result could be achieved (mainly referring to the vast open space shown in the renderings which of course makes for a more appealing proposal even to the point where it may sway the balance of voting - please refer 2 attachments) considering Bankstown CBD's physical layout and what is possible within those confines could possibly be seen as reckless? If the final impression of the proposal can't be believed, how could anyone have confidence in what is being proposed is in the best interests of ratepayers?

Infrastructure required to support said Masterplan.

With regard to infrastructure within the CB district, in peak hour especially, it struggles at present; so to multiply the population density in the coming years without change to that infrastructure is going to heavily disadvantage locals in the name of 'progress,' and to think that the imminent Metro line which terminates at Bankstown will solve all problems would be quite naive. In peak hour Bankstown, the main thoroughfare of traffic making its way from Sydney's south-west Menai district and everywhere in between, snakes its way along Alford's Pt, Davies & Fairford Rds onto Stacey St & then up to the Hume Hwy at Chullora - the biggest headache for local city bound commuters over the last 20 or so years. In past years I have sometimes spent half an hour in the morning peak (along Stacey St) to get from Canterbury Rd to the Hume Hwy. A major undertaking by Bankstown Council and State Govt in recent years was enacted (which taxpayers paid a premium for), to widen Stacy St between Macauley Ave and the railway bridge adjacent to Bankstown Central Shopping Centre, where it once again becomes a bottle-neck from 3 lanes (each way) back into 2 lanes - a questionable gain in terms of traffic flow. The main gain would be in making it 3 lanes each way from the bridge to the Hume, but the cost of widening the bridge is understandably prohibitive. However, with the sort of high density proposed by CB Council it may be the bitter pill local & State govt. may have to swallow - and indeed the State Govt. did alter all bridges on the East Hills train line years ago to accomodate the addition of two extra tracks, doubling its capacity.

Turning our attention to the intersection between Stacey St and the Hume Hwy, this can sometimes be a basket case at present in peak hour, let alone with doubling the local population. Again it would be an inconvenient and costly exercise to do so, but ideally if it was handled as it was with the intersection of Church St & Victoria Rd at Ryde with an underpass - that would help address State & Local Govt's eagerness to substantially increase our density of living in the long run. Ryde suffered during the construction of that underpass but now enjoys its benefit.

Car parking in Bankstown CBD.

Over the years, parking has become more & more of an issue in the heart of Bankstown, particularly in the run up to Christmas, when you often spend time driving around looking for a spot. As high-rise increases, more people are trying to access fewer parking spaces and local govt. turns a blind eye. When the new university campus opens (which is built on a former carpark) & the ever increasing blocks of units become occupied, free parking might become a thing of the past – which will greatly impact the majority of council constituents. One thing that I think has added to this problem is with regulations determining how much parking is required to be provided in new unit blocks. I had a discussion with a councillor a couple of years ago who said that it wasn't a problem to require fewer if any spaces, because they'll be using public transport. It was a shock to me that someone within council was so naive to think or expect that people in this day & age are so keen on losing their independence. Most units anywhere house a family or what will become a family – most wanting the benefits of employment and travel. Husband & wife have separate jobs and a vehicle to get there, kids need to be dropped off to school or sport and as with any children, they aspire to having independence and a car which goes hand in glove with that. So that is the occupants each wanting a car – and most of these have friends who want to visit – with a car to park on arrival. If you were to suggest to any councillor that they should forego the benefit of their personal transport, I think it would be howled down as most inappropriate – and the rest of us are no less worthy than those in such a position – in fact we put them into a job to satisfy constituents who pay their wages. So parking is a current issue and will multiply in proportion to the increase in population. In conclusion, a lot to be considered before rejoicing about future high density living and possible conflicts which occur when people live in closer proximity. Governments at all levels always seem so keen on increasing their flock – unfortunately often at the expense of those who live there and have done so for most of their lives. It is here we have the opportunity to comment on that.

I agree to the above statement

Yes

RESPONSE TO CB COUNCIL'S "HAVE YOUR SAY" IN REVIEWING OUR CITY'S COMMUNITY STRATEGIC PLAN

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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: Friday, 30 August 2024 4:26:25 PM
Attachments: [bankstown-tod-reasoning-proposal-1.pdf](#)

Submitted on Fri, 30/08/2024 - 16:25

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████████

Last name

██████████

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

Yes

Info

Email

██

Suburb/Town & Postcode

Bankstown

Please provide your view on the project

I support it

Submission file

[bankstown-tod-reasoning-proposal-1.pdf](#) (61.95 KB)

Submission

Please view attached document.

I agree to the above statement

Yes

Department of Planning, Housing and Infrastructure

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150

We are writing to express our support for the Bankstown Planning Proposal, which promises to enhance the community's quality of life, increase planning controls to permit uplift in density, and foster sustainable urban development. This submission outlines several key aspects and suggestions for the proposal that we believe should be integrated within the TOD planning proposal which will significantly benefit the area and contribute to its long-term growth.

1. Increase in Affordable Housing

The proposal's commitment to increasing affordable housing to 3-10% is commendable. However, it is vital and essential for this to be increased to up to 15%. We strongly support the proposal's aim to increase affordable housing, and recommend elevating this to 15% of all new housing developments. Based on ABS data and statistics for households within Bankstown, the area is considered to be socially and economically disadvantaged with low average household incomes compared to other TOD precincts. This initiative ensures that a diverse range of housing options will be available, making Bankstown more accessible to a wider demographic. By maintaining affordability in perpetuity, it will promote socioeconomic diversity and stability in the community.

2. Extension of Cycling Paths

We support the proposal's plan to extend cycling paths, however we also believe it is essential to extend cycling paths to other neighboring suburbs including to Revesby, Regents Park, Sefton and other neighboring suburbs. Encouraging active transport through well-connected and accessible cycling infrastructure will promote healthier lifestyles, reduce traffic congestion, and lower environmental impact. The provision of both separated and shared cycling paths should also be integrated within the Masterplan, coupled with increased street tree planting. This would enhance the aesthetic and functional quality of these routes.

3. Integration of Green Roofs and Walls

We suggest incorporating requirements for green roofs and walls in new developments. These features provide critical environmental benefits, including enhancing local and native biodiversity and mitigating the urban heat island effect. Green infrastructure aligns with sustainable urban design principles and will contribute to a healthier urban environment.

4. Enhancement of Public Domain Works

Increasing public domain works is essential for community well-being. We propose adding new public seating near local businesses and restaurants, as well as in new or existing public open spaces. This will foster community interaction, support local businesses, and enhance the attractiveness of public areas. These improvements will enhance the vibrancy and appeal of

public spaces, encouraging social interaction and supporting local commerce. Additionally, increased landscaping across neighborhood streets and major roads, such as Chapel Road and Restwell Street, will improve the area's visual appeal and create a more pleasant environment for residents and visitors.

5. Outdoor Seating for Local Businesses

Permitting outdoor seating for local businesses and restaurants will enrich the street environment and stimulate local commerce. This provision will create a more vibrant and engaging public realm, benefiting both businesses and the community.

6. Increased Zoning for Commercial and Business Floor Space

We believe the proposal should increase zoning and permissibility for commercial and business floor space within Bankstown City Centre is essential for economic growth, by encouraging more shop-top housing developments and mixed use developments. By expanding commercial opportunities, it will stimulate job creation and strengthen the local economy, contributing to the area's overall economic prosperity.

7. Promotion of Active Frontage around Western Sydney University

To enhance the impact of the new Western Sydney University campus, we recommend promoting active frontage and increasing commercial uses around the campus. This will attract student activity and increase foot traffic within the Civic Precinct, creating a dynamic and engaging environment that supports both educational and commercial interests.

Conclusion

The Bankstown Planning Proposal represents a significant opportunity to enhance the community's livability and sustainability. By increasing affordable housing, expanding cycling infrastructure, integrating green technologies, and improving public spaces, would address critical aspects of the TOD planning proposal. We fully support the initiatives and believe they will collectively contribute to a vibrant, inclusive, and sustainable future for Bankstown.

Thank you for considering these recommendations. We believe that their inclusion will strengthen the proposal and bring significant benefits to the Bankstown community. We look forward to the positive outcomes this proposal will bring to the Bankstown community.

Sincerely,

██████████

██████████

██████████

██████████████████



Brandon Avenue, Bankstown

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 4:28:13 PM

Submitted on Fri, 30/08/2024 - 16:27

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Linden

Last name

Clark

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

I wish to formally object to the proposed Bankstown TOD masterplan, as its development may have severe repercussions for our local area.

Major public investments, such as the new hospital and metro station, require complementary residential and commercial development to fully realise their benefits. Higher density around these infrastructure projects ensures that they are effectively utilised and supported by a sufficient population base. This alignment is crucial for maximising the return on public investment and ensuring widespread benefits.

Increased density enhances the effectiveness of these infrastructure investments by providing a larger and more diverse user base. This leads to greater utilisation of public services and facilities, improving their overall efficiency and impact. By integrating higher density with infrastructure projects, we can create more vibrant and functional urban areas.

Supporting infrastructure investments with higher-density development can also attract additional public and private investment. This can lead to further improvements in infrastructure and services, creating a positive feedback loop that enhances the overall quality and sustainability of the urban environment.

The construction industry is currently facing significant economic pressures due to rising material and labour costs. To make construction projects financially feasible, it is essential to ensure that they are of sufficient scale. Higher-density developments provide the necessary economies of scale to offset these increased costs and make projects more viable for builders and developers.

Larger, high-density projects are more likely to attract investment and funding, offering a greater return on investment compared to smaller-scale developments. This can help alleviate financial pressures on construction companies and support the continued growth of the industry. By increasing density, we can create more opportunities for builders and ensure that construction projects remain economically viable.

Additionally, higher-density developments can contribute to the creation of more affordable housing options. This can help address some of the challenges facing the construction industry and support a more balanced approach to urban development. By addressing both housing needs and construction challenges, we can foster a more sustainable and resilient development environment.

The recent confirmation of the new Bankstown Hospital site presents a transformative opportunity for the area. Hospitals not only serve as crucial healthcare facilities but also stimulate local economies by attracting healthcare professionals and related businesses. Higher density around the hospital would enable the creation of a robust healthcare precinct, supporting a range of amenities such as medical offices, pharmacies, and specialist clinics.

With increased residential density, the area around the hospital can evolve into a well-rounded healthcare hub. This would provide convenience for patients and staff while fostering economic activity. Furthermore, a larger population base would enhance the viability of ancillary services, ensuring that the hospital's impact extends beyond healthcare to include economic and social benefits.

Integrating higher-density residential development with the hospital's operations would create a cohesive and accessible environment. This synergy would not only streamline the delivery of healthcare services but also drive job creation and support local businesses, contributing to a more dynamic and sustainable community.

To ensure a more balanced and community-oriented approach, I hope you will take these objections seriously and make the necessary adjustments to the Masterplan.

Regards,
Linden Clark

I agree to the above statement
Yes

From: [Planning Portal - Department of Planning and Environment](#)
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Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Bankstown TOD rezoning proposal
Date: Friday, 30 August 2024 4:30:34 PM
Attachments: [gandangara-lalc-tod-submission.pdf](#)

Submitted on Fri, 30/08/2024 - 16:29

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

██████████

Last name

██████████

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

Yes

Info

Email

██

Suburb/Town & Postcode

2170

Please provide your view on the project

I am just providing comments

Submission file

[gandangara-lalc-tod-submission.pdf](#) (267.97 KB)

Submission

Please see attached letter.

I agree to the above statement

Yes

Gandangara Local Aboriginal Land Council – Proposed Pathway changes to support Transport Oriented Development Submission

Gandangara Local Aboriginal Land Council (GLALC) has reviewed the proposed [Transport Oriented Development \(TOD\) Accelerated Precinct for Bankstown](#). GLALC request a detailed and ongoing discussion, as the programs progresses (potentially in September, subject to GLALC Board endorsement). with agreement in writing.

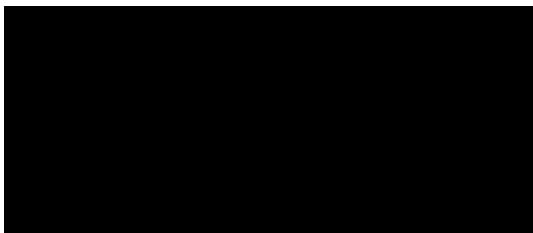
The recommendations of the below exhibited documents will require further consultation to clarify GLALC role and ensure GLALC aspirations are delivered through the program in a manner to respond to the needs, restrictions and considerations of the LALC.

- [Aboriginal Cultural Heritage Advice Report](#) – Connecting with Country information and principles for engaging with GLALC going forward for shaping Bankstown
- [Heritage Report](#) – how European and Aboriginal heritage will interact
- [Explanation of Intended Effect](#) – overall guide to the precinct
- [Social infrastructure and public domain](#) – opportunities for contributing to spaces, services and street design, landscaping and art.

Please find interim comments below.

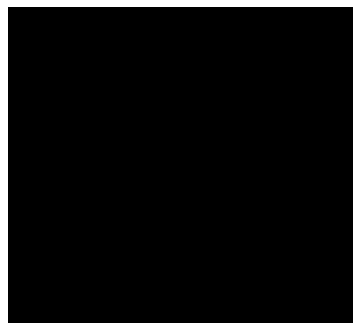
The recommendations of the exhibited documents will require further consultation to clarify GLALC role, and to ensure that GLALC aspirations are delivered through the program and are designed in a manner that respond to the needs, restrictions and considerations of the LALC.

GLALC looks forward to working with the Department of this city-shaping opportunity.



Gandangara Local Aboriginal Land Council
Chief Executive Officer

30 August 2024



Culture & Heritage Lead Archaeologist

30 August 2024

Gandangara Local Aboriginal Land Council – Background

GLALC covers the entirety of the TOD area and supports all Aboriginal persons within its boundaries of South-Western Sydney.

GLALC is a statutory body akin to the roles and responsibilities of local government. It represents 784 members, is managed by a Board of 10 elected members, and led by CEO and staff. GLALC is the representative body for its members, consisting of members of local community across South-Western Sydney. GLALC is a significant private land holder in its own right with a significant development portfolio across South-Western Sydney.

GLALC is responsible for:

- take action to protect culture and heritage of Aboriginal persons in the council area, subject to any other law
- promote awareness in the community of the culture of the Aboriginal persons in the council area
- acquire land to use, manage and control, hold or dispose of or otherwise deal with land invested in by the Council
- facilitate business enterprises including establishing, acquiring, managing or operating business enterprises according to the Aboriginal Land Rights Act 1983, the regulations and consistently with their Community, Land and Business Plan (CLBP).

GLALC is required by their CLBP to investigate options arising through the acquisition of new land, to construct and manage new housing stock that meets the diverse needs of our communities.

In addition, to performing our statutory functions, GLALC owns and operates a medical practice – Gandangara Health Services Limited, a transport business – Gandangara Transport Services Limited and a health promotion and brokerage service – Marumali.

Comment	Information
Embedding Aboriginal outcomes into controls	
<p>Embed Connecting with Country, including Aboriginal consultation and co-design with GLALC, into controls and legislation</p>	<p>The master-planning for the TODs should ensure GLALC and community are partnered with to deliver heritage and culture through Connecting with Country for development and public domain.</p> <p>GLALC supports the intention of the Connecting with Country (CwC) Framework and emphasises the need for the relevant planning controls to embed and implement these principles into deliverable outcomes in the Bankstown precinct. However, would like to note that there are no minimum consultation timeframes within the CwC Framework which could detract from the process of meaningful and transparent consultation.</p> <p>By legislating CwC outcomes as a requirement, DPHI will ensure that consultation, co-design and the management of Aboriginal heritage is implemented across the Bankstown precinct for both private development, government led projects, and public domain urban design. However, a minimum timeframe / period for consultation should also be included. We have had issues in the past where Gandangara has been expected to be able to respond to CwC Framework consultations within 7 days. This is not achievable if the idea is to consult with our network of elders and community members, and would take a minimum of approximately one month to ensure all groups are consulted.</p> <p>Strengthening these controls will ensure Aboriginal consultation and partnership is an integral component in the planning process for decision makers. Legislating these controls without mandated response timeframes could create ongoing consultation issues.</p>
<p>Recognise Aboriginal Land Rights Act 1983 in controls and legislation</p>	<p>In addition to the above, the controls and legislation amendments for Connecting with Country, the plan should also provide specific inclusion of the Aboriginal Land Rights Act 1983.</p> <p>In particular, the role of land use planning and government decision making in achieving the principles of self-determination for Aboriginal people and delivery of Aboriginal outcomes through the precinct.</p>
<p>Create project control group to manage ongoing consultation</p>	<p>The program’s recommendation for ongoing consultation as part of private and public developments will need to be effectively managed to avoid consultation-fatigue for the LALC.</p> <p>A project control group could be implemented to support these elements. GLALC should be consulted on procedures for determining group membership and function, with terms of reference that ensure the voices of each party are considered.</p> <p>Effective scheduling and programming for any project control group should be designed to allow for careful consideration of</p>

	<p>proposals, whilst responding to the resource requirements of GLALC or community members.</p> <p>The formalised engagement plan for ongoing consultation should have consideration to the role of GLALC as a primary point of contact, noting the statutory status, governance structure and ALRA responsibilities of GLALC.</p> <p>Formalised consultation plan and structure would enable GLALC to bring our local members, including Elders and knowledge holders, to contribute with appropriate timing and environment for effective collaboration. This should all be done with minimum consultation periods in effect to allow GLALC appropriate timing to respond at each stage of consultation.</p>
<p>Aboriginal Heritage in private proposals and public domain</p>	
<p>Utilise Aboriginal Cultural Heritage Assessment Report</p>	<p>GLALC would like to emphasise the role of the LALC as a statutory body responsible for advocating for the protection and preservation of cultural heritage within our boundary. As knowledge holders and a statutory body, GLALC is to be utilised as the primary resource to manage the ACHAR for future developments, the consultation and assessment of which should be completed in line with the requirements of the NSW National Parks and Wildlife Act 1977, Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), and Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010)</p>
<p>Create Aboriginal Heritage Interpretation Strategies</p>	<p>An Aboriginal Heritage Interpretation strategy should be developed in partnership with GLALC and other relevant stakeholders:</p> <ul style="list-style-type: none"> • stories and history re-introduced to the area (including environment landscaping) • ensure art and culture are in high-value and highly visible areas in the Bankstown precinct • establishing new creative trials to promote active transport, creativity, and Aboriginal heritage in the Bankstown precinct <p>GLALC supports the opportunity to reinterpret its knowledge into the centre of the Bankstown precinct and encourage the Department to consider legislation that will ensure Aboriginal cultural knowledge is included and delivered through the Bankstown precinct.</p> <p>GLALC recognises the successful implementing of this at the Redfern precinct. The precinct includes Aboriginal history and re-interpretation into public art, public domain and building design. GLALC would like to see this continued across the Bankstown precinct.</p> <p>GLALC has significant cultural and local knowledge, including resources, for enhancing an interpretation strategy to ensure art,</p>

	<p>culture and environment are enhanced and genuinely representative of the Bankstown precinct.</p> <p>There is an opportunity for the Local Council to partner with GLALC to design and deliver public domain improvements with cultural knowledge through a Deed of Agreement.</p> <p>Further to the above, any ongoing procedure or program for identifying, interpreting and implementing delivery of Aboriginal knowledge in the public domain or within the private development, should be designed with the appropriate representatives.</p>
<p>Utilise GLALC as key contact for management of Aboriginal Objects discovered during construction and investigate opportunity for keeping space.</p>	<p>GLALC is responsible for the keeping and managing of any Aboriginal Objects discovered and should be primary source of consultation for any Aboriginal Objects discovered through the works carried out within the precinct.</p> <p>GLALC requests access to a keeping place for the safe storage, care, management and potential display of any items discovered during the works, or to have the Aboriginal Objects returned into GLALC's care at their keeping place. This is aligned with GLALC's Community Land and Business Plan.</p>
<p>Aboriginal Jobs and Business opportunities</p>	
<p>Secure jobs for local Aboriginal community during design, construction and operation of the precinct</p>	<p>An Aboriginal Procurement strategy could be included or supported by the TOD masterplan and legislation.</p> <p>The city-shaping development of the Bankstown precinct through master-planning is an opportunity for governments (state and local) to partner with GLALC. This could facilitate creation of jobs for GLALC community members, including intergenerational uplift for youth.</p> <p>Through providing procurement opportunities for the LALC and local Aboriginal controlled businesses, the shaping of the precinct is an opportunity for jobs for the local community.</p> <p>GLALC requests investigation into the planning policy and control levers that could be integrated into the plan to require, or enable, the procurement of Aboriginal staff through the lifecycle of the program.</p> <p>Jobs created should extend beyond guidance for art and design and provide ongoing work and jobs across all projects aspects and at all levels.</p>

<p>Partner with GLALC to provide opportunities for Aboriginal Businesses</p>	<p>GLALC supports the creation of mixed-use zones with commercial spaces as well as residential uplift. GLALC requests spaces dedicated to Aboriginal owned and run business within the Bankstown precinct.</p> <p>It is noted that occupancy of commercial spaces will be subject to market and tendering, however GLALC requests DPHI to investigate what planning levers and legislative opportunities are available for securing spaces for Aboriginal businesses, community space and jobs.</p>
<p>Provide opportunity for Aboriginal operated community space , including keeping place for Aboriginal Objects and culture</p>	<p>GLALC supports the provision of a First Nations Oriented Space included into the master-planning for the precinct, and would like to discuss further how this would be delivered and managed ongoing.</p> <p>Further discussion as to the operation of any space or facility should clarified with GLALC, including the ownership status of any such development.</p> <p>As detailed above, GLALC requests investigation into dedicated cultural space for the keeping of Aboriginal Objects, and/or input into the decisions of storage options in the instance Aboriginal Objects are located.</p> <p>GLALC is open to working with other Aboriginal organisations to enter into appropriate agreements for the managing.</p>
<p>Affordable Housing</p>	
<p>Provide dedicated affordable housing for Aboriginal community</p>	<p>GLALC is supportive of the 3-10% target of affordable housing, but would request consideration for increase to this amount of 15% to be delivered in the precinct.</p> <p>GLALC requests consideration for how a proportion of this could be reserved to support members of the local Aboriginal community. Such a consideration will enable the local community to connect back to their Country.</p> <p>GLALC also request that any consideration of affordable housing (Aboriginal or otherwise) respond to the local need, including large sized dwellings to cater for diverse family sizes (large families, intergenerational families etc).</p>

The following section explains how this submission is supported by Closing the Gap Priority Reforms.

Closing the Gap Priority Reforms

Improved outcomes for Aboriginal Community through the design, construction and operation of the TOD precinct will contribute directly to the National Agreement on Closing the Gap, including NSW Governments commitment to its achievement.

Shared decision making, collaboration and co-design

Collaboration, co-design and management with Aboriginal community will contribute to Closing the Gap Closing the Gap Priority Reform 1 - Formal Partnerships and Shared Decision Making by ensuring decision-making is shared between government and Aboriginal and Torres Strait Islander people.

It will also contribute to Priority reform 3 - Transforming Government Organisations by delivering services in partnership with Aboriginal and Torres Strait Islander organisations, communities and people.

Jobs

Provision of allocated spaces for business and jobs will contribute directly to Closing the Gap Priority Reform 2 - Building the Community-Controlled Sector. In particular a partnership between Government and the LALC will Recognise that building strong community-controlled sectors to deliver Closing the Gap services and programs requires national effort and joined up delivery against all sector elements in agreed priority areas.

Housing

Provision of affordable housing in the Bankstown precinct will contribute to Closing the Gap Priority Reform 1 - Formal Partnerships and Shared Decision Making. In Particular it would address how Government will commit to establishing policy and place-based partnerships to respond to local priorities; including housing need.

Aboriginal Land Rights Act 1983

Access to opportunities for provision of affordable housing for our community would contribute to principle of self-determination which underpins the Aboriginal Land Rights Act 1983 (ALRA) in NSW.

GLALC is required by their CLBP will investigate options arising through the acquisition of new land, to construct and manage new housing stock that meets the diverse needs of our communities. While the LALC currently manages mostly larger family homes, priorities for new housing will include a mix of smaller dwellings.

The ALRA recognises the traditional ownership and occupation of the land by Aboriginal peoples and the importance of their connection to land. This means the ALRA recognises the spiritual, social, cultural and economic importance of land to the state's Aboriginal peoples.

The ALRA also acknowledges that past governments' decisions have progressively reduced the lands set aside for Aboriginal people without compensation.

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 4:37:20 PM

Submitted on Fri, 30/08/2024 - 16:37

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

harold

Last name

nguyen

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

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Birrong

Please provide your view on the project

I object to it

Submission

Dear DPHI Assessment Team,

I am deeply concerned about the Bankstown TOD masterplan and wish to register my objection based on the plan's shortcomings and potential risks.

The housing shortage in Bankstown is a critical issue that requires immediate action. Increasing density through higher-density developments is a key strategy for addressing this shortage. By adding more housing units to the area, we can help alleviate the pressure on the housing market and provide more affordable options for residents. Higher-density development also makes more efficient use of available land, reducing the need for urban sprawl. By focusing development within existing urban areas, we can preserve green spaces and natural environments, while still meeting the housing needs of a growing population. This approach supports sustainable urban growth and helps to manage

the environmental impact of new construction.

In addition, increased density can lead to a more diverse range of housing options. This diversity is essential for accommodating different needs and preferences, ensuring that housing remains accessible and affordable for a wide range of individuals and families. Without significant density increases, the housing crisis will continue to worsen, further exacerbating affordability issues and putting additional strain on the housing market.

The construction industry is currently facing significant challenges, including rising material and labour costs. To ensure that development projects remain economically viable, it is crucial to pursue higher-density developments. By increasing density, construction companies can achieve economies of scale, making projects more financially feasible and attractive to investors.

Higher-density projects provide a more sustainable financial model for construction companies, helping to offset the rising costs of materials and labour. This approach supports the continued operation of construction firms and contributes to a healthy and competitive industry. Without higher-density developments, many construction companies may struggle to remain viable, potentially leading to a reduction in industry capacity and job losses.

Furthermore, the economic benefits of higher-density development extend beyond the construction phase. Increased residential and commercial density contributes to long-term economic growth, supporting job creation and business opportunities. This broader economic impact helps to sustain the local economy and contributes to a more robust and resilient community.

Current zoning regulations and planning constraints related to existing walk-up apartments limit the potential for further redevelopment and density increases. These constraints can hinder efforts to address housing needs and make it difficult to maximise land use. Revisiting and amending these constraints is crucial for unlocking the full potential of the area for higher-density development.

Increased density can help overcome the limitations imposed by existing walk-up apartments, allowing for more efficient use of land and resources. This adjustment is essential for addressing the housing shortage and ensuring that redevelopment projects contribute effectively to the overall housing supply. Without these changes, the constraints of existing walk-up apartments will continue to restrict growth and exacerbate the housing crisis.

Furthermore, revising zoning regulations to support higher density creates a more flexible and responsive planning framework. This approach allows for better alignment with current and future housing needs, ensuring that development projects can adapt to changing demands and contribute to a more dynamic and resilient urban environment.

In light of the points raised, I firmly believe that the current Masterplan requires substantial revisions to better serve the interests of local residents. Your prompt attention to this matter would be greatly appreciated.

Regards,
Harold Nguyen

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 4:40:18 PM

Submitted on Fri, 30/08/2024 - 16:40

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Andy

Last name

Loxley

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 am writing to raise my serious objections to the Bankstown TOD masterplan, which, in my view, fails to protect the interests of our local community.

Higher-density development has the potential to create numerous job opportunities, both during the construction phase and in the operational phase. Increased development activity leads to more construction jobs, supporting the local workforce and contributing to economic stability. Once completed, higher-density developments generate employment in various sectors, including retail, hospitality, and services.

The presence of a larger residential and commercial base drives increased consumer spending, benefiting local businesses and supporting economic growth. This increased economic activity attracts new enterprises and encourages the expansion of existing businesses, creating a dynamic and thriving local economy. The job creation and economic

growth resulting from higher-density development contribute to a more vibrant and successful community.

Moreover, higher-density development improves access to services and amenities for residents, enhancing their overall quality of life. This improved living environment supports a more attractive and functional urban area, making Bankstown a more desirable place to live and work. The positive impact on the local economy and job market underscores the importance of pursuing higher-density development.

The construction of the new metro station represents a significant advancement in public transport infrastructure for Bankstown. To fully capitalise on this investment, it is essential to increase residential density around the metro station. Higher-density development will maximise the benefits of improved transport connectivity, making it easier for residents to access the station and reducing reliance on private vehicles.

Increased density around the metro station also supports the feasibility of frequent and reliable public transport services. A larger population base generates higher demand for metro services, justifying more frequent and efficient scheduling. This enhanced public transport network will encourage greater use of metro services, reduce traffic congestion, and contribute to a more sustainable urban environment.

Moreover, high-density development near the metro station fosters a more walkable and integrated neighbourhood. By providing a mix of residential, commercial, and recreational spaces, we can create a vibrant and convenient urban environment that supports a higher quality of life for residents. This development model enhances the attractiveness of the area and leverages the metro station as a central component of a well-connected community.

The Bankstown commercial centre is a key economic hub that provides essential services and employment opportunities. To ensure that this centre remains competitive and continues to grow, it is essential to increase residential density in its vicinity. Higher-density development will create a larger and more stable customer base for businesses, driving demand and supporting economic expansion.

Higher density also facilitates the development of mixed-use properties, integrating residential, commercial, and retail spaces. This approach fosters a more dynamic and functional urban environment, where residents can live, work, and shop in close proximity. Such integration enhances the commercial centre's appeal and encourages a more sustainable urban model.

Furthermore, increased density supports investment in infrastructure and services, including improved transport links and public amenities. With more residents and businesses in the area, there is a stronger economic rationale for upgrading infrastructure, which in turn benefits the commercial centre. This investment supports long-term economic growth and contributes to a more resilient and attractive commercial hub.

Thank you and I strongly urge the Department to address the issues identified and revise the Bankstown TOD Masterplan accordingly.

Andy Loxley

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 4:44:21 PM

Submitted on Fri, 30/08/2024 - 16:44

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Clifford

Last name

Mallin

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

I am writing to voice my strong objections to the Bankstown TOD masterplan, as I believe it undermines key elements of our community's infrastructure and future growth.

The commercial centre in Bankstown is a crucial economic hub, providing various services and employment opportunities. To ensure its continued success, higher residential density in the surrounding areas is essential. A larger population base will generate increased demand for commercial services, supporting local businesses and fostering economic growth.

High-density development enables the creation of mixed-use buildings that combine residential, commercial, and retail functions. This integration supports a more robust and resilient commercial centre, where businesses benefit from a steady stream of customers and increased economic activity. Additionally, higher density can attract new businesses to

the area, contributing to economic diversification and enhanced business opportunities.

Furthermore, increased residential density supports investments in infrastructure and public amenities. With more residents and businesses in the area, there is a stronger economic rationale for upgrading and expanding local services. This investment contributes to the long-term vitality and competitiveness of the commercial centre, ensuring that it remains a key economic driver for Bankstown.

The Bankstown Hospital's confirmation as a central development is a significant opportunity for local growth. To fully capitalise on this investment, higher residential density in its surrounding area is essential. Increasing density will provide convenient housing for the hospital's staff, including doctors, nurses, and administrative personnel. A higher population density ensures that healthcare workers can live closer to their workplace, reducing commute times and increasing job satisfaction.

Furthermore, higher density near the hospital supports the development of ancillary services such as cafes, medical supply shops, and restaurants. This creates a more integrated community, where residents and healthcare workers benefit from improved local amenities. Additionally, a well-planned, high-density environment around the hospital can stimulate further investment in healthcare-related infrastructure and services, enhancing the overall effectiveness and accessibility of the hospital.

Lastly, increasing density in the vicinity of the new hospital site helps to optimise land use. By allowing for taller buildings and more residential units, the development area can better accommodate the growing demand for housing, ensuring that the benefits of the new hospital are fully realised and that the surrounding community thrives.

Existing walk-up apartments impose significant constraints on further redevelopment and density increases. These constraints limit the potential for effectively addressing the housing shortage and utilising land to its fullest extent. To unlock the full potential of the area, it is essential to revisit and amend these constraints, allowing for higher-density development.

Increased density can overcome the limitations imposed by existing walk-up apartments, enabling more efficient land use and addressing the housing crisis more effectively. Adjusting zoning regulations and planning constraints to support higher density is crucial for ensuring that redevelopment projects contribute meaningfully to the overall housing supply. Without these changes, the constraints of existing walk-up apartments will continue to restrict growth and exacerbate the housing crisis.

Revising zoning regulations to support higher density also creates a more flexible and responsive planning framework. This approach allows development projects to adapt to current and future housing needs, contributing to a more dynamic and resilient urban environment. Addressing these constraints is vital for achieving sustainable and effective urban development.

I hope that my concerns will prompt a reconsideration of the Masterplan, leading to adjustments that will benefit both the community and the overall success of the development project.

Regards,
Clifford Mallin

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 4:46:44 PM

Submitted on Fri, 30/08/2024 - 16:46

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Mallory

Last name

Harris

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 Bankstown Team,

I am compelled to object to the Bankstown TOD masterplan, as I believe its current provisions fail to meet the needs and expectations of our local population.

Bankstown is facing a significant housing shortage that impacts many residents. To effectively address this issue, increasing residential density is essential. Higher-density developments will add more housing units, alleviating pressure on the housing market and providing more affordable options for a diverse range of residents.

Increased density promotes efficient land use, reducing the need for urban sprawl. By focusing development within existing urban areas, we can preserve green spaces and minimise the environmental impact of new construction. This approach supports

sustainable urban growth and ensures that housing demand is met without expanding into undeveloped areas.

Moreover, higher-density development enables the creation of a variety of housing options, catering to different needs and preferences. This diversity is crucial for accommodating a growing and evolving population, ensuring that housing remains accessible and affordable. Without significant increases in density, the housing crisis will continue to escalate, exacerbating affordability issues and straining the housing market.

Bankstown's existing shopping centres are central to the local economy, offering a range of goods and services while supporting jobs. To ensure these centres remain viable and continue to thrive, increased residential density is crucial. A higher population density will generate greater foot traffic, boosting retail sales and supporting the financial stability of these centres.

The presence of a larger residential base will also attract new retailers and service providers to the area. This increased diversity enhances the shopping experience for residents and stimulates economic growth. More people living nearby means a larger customer base for existing businesses, encouraging them to expand and invest in upgrades, thus revitalising the shopping centres.

Higher-density development can also facilitate the integration of residential and commercial spaces. Mixed-use developments can include apartments above retail shops, fostering a more dynamic and accessible shopping environment. This model not only enhances the functionality of shopping centres but also contributes to the overall vibrancy of the area.

Higher-density development creates numerous job opportunities, both during and after construction. Increased development activity leads to more construction jobs, supporting the local workforce and contributing to economic stability. Once completed, higher-density developments generate employment in various sectors, including retail, hospitality, and services.

A larger residential and commercial base drives consumer spending, benefiting local businesses and supporting economic growth. This increased economic activity attracts new enterprises and encourages the expansion of existing businesses, contributing to a dynamic and thriving local economy. The job creation and economic growth resulting from higher-density development enhance the overall vibrancy and success of the community.

Furthermore, higher-density development improves access to services and amenities for residents, enhancing their quality of life. This improved living environment makes Bankstown a more desirable place to live and work, supporting both economic and social benefits. The positive impact on the local economy and job market highlights the importance of pursuing higher-density development.

In conclusion, I respectfully ask that the Bankstown TOD Masterplan be revisited with a focus on addressing the highlighted issues to ensure it supports sustainable and community-friendly growth.

Mallory Harris

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 4:49:44 PM

Submitted on Fri, 30/08/2024 - 16:49

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Ravindra

Last name

Kothari

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 TOD Team,

I am writing to formally lodge my objections to the Bankstown TOD masterplan, as it presents several challenges that have not been adequately addressed.

Higher-density development creates numerous job opportunities, both during and after construction. Increased development activity generates more construction jobs, supporting the local workforce and contributing to economic stability. Once completed, higher-density developments create employment in various sectors, including retail, hospitality, and services.

A larger residential and commercial base drives increased consumer spending, benefiting local businesses and supporting economic growth. This increased economic activity

attracts new enterprises and encourages the expansion of existing businesses, creating a dynamic and thriving local economy. The job creation and economic growth resulting from higher-density development enhance the overall vibrancy and success of the community.

Moreover, higher-density development improves access to services and amenities for residents, enhancing their quality of life. This improved living environment makes Bankstown a more desirable place to live and work, supporting both economic and social benefits. The positive impact on the local economy and job market underscores the importance of pursuing higher-density development.

The construction industry is facing significant challenges due to rising costs for materials and labour. To ensure that development projects remain economically viable, higher-density developments are crucial. By increasing density, construction companies can achieve economies of scale, making projects more financially feasible and attractive to investors.

Higher-density projects provide a more sustainable financial model, helping to offset rising costs and support the continued operation of construction firms. This approach prevents the potential closure of businesses due to economic pressures and maintains a competitive and robust construction industry.

Additionally, the benefits of higher-density development extend beyond the construction phase. Increased density fosters long-term economic growth, supporting job creation and business opportunities. This broader economic impact contributes to overall stability and success, ensuring that development projects deliver lasting benefits to the community.

It is my sincere hope that these objections will lead to meaningful revisions of the Masterplan, allowing for a development that truly enhances the Bankstown area without compromising its integrity.

Regards,
Ravindra Kothari



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 4:53:27 PM

Submitted on Fri, 30/08/2024 - 16:53

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Saraswati

Last name

Dora

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 with significant concerns about the Bankstown TOD masterplan and wish to express my objections regarding its potential effects on our community.

The confirmation of the new Bankstown Hospital site is a major development that presents a unique opportunity for integrated urban planning. To fully capitalise on this healthcare facility, increasing the residential density in its vicinity is crucial. High-density housing will provide essential accommodation for hospital staff, including medical professionals and support personnel, significantly reducing their commuting times and enhancing their quality of life.

Proximity to the hospital will also attract related services such as pharmacies, clinics, and

specialised medical shops, creating a healthcare hub that benefits both residents and visitors. This will enhance the accessibility of health services and foster a more cohesive and supportive community around the hospital.

Moreover, higher-density development around the hospital site will ensure that the land is used efficiently, accommodating more people and reducing urban sprawl. This will support the creation of a vibrant, self-sufficient community where the hospital's benefits are fully leveraged, contributing to the overall success of this major infrastructure investment.

Bankstown's commercial centre is a key economic driver, offering a range of services and employment opportunities. To sustain and bolster its economic vitality, increased residential density in the surrounding areas is essential. More residents translate into higher demand for commercial services, which supports local businesses and stimulates economic growth.

Higher density encourages the development of mixed-use properties, integrating residential and commercial functions. This creates a more robust commercial environment, where businesses benefit from a steady flow of customers and increased economic activity. Additionally, it attracts new businesses to the area, fostering economic diversity and creating additional opportunities for local entrepreneurs.

The increased economic activity resulting from higher-density development also supports investment in infrastructure and public amenities. This investment is crucial for the long-term success of the commercial centre and ensures that it remains a vibrant and attractive place for both businesses and residents.

Higher-density projects offer a more sustainable financial model by allowing for larger and more efficient developments. This approach helps offset rising costs and supports the continued operation of construction firms, preventing potential business closures due to economic pressures.

I appreciate your attention to these matters and trust that you will take the necessary steps to amend the Masterplan in a way that reflects the concerns and needs of the local community.

Regards,
Saraswati Dora

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 4:56:23 PM
Attachments: [bankstown-tod-submission_catholic-parish-of-st-felix-de-valois,-bankstown_submitted-final.pdf](#)

Submitted on Fri, 30/08/2024 - 16:52

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

██████

Last name

██████

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

Yes

Info

Email

██

Suburb/Town & Postcode

Leichardt 2040

Please provide your view on the project

I support it

Submission file

[bankstown-tod-submission_catholic-parish-of-st-felix-de-valois,-bankstown_submitted-final.pdf](#) (4.19 MB)

Submission

See attached submission on behalf of the Catholic Parish of St Felix De Valois, Bankstown.

I agree to the above statement

Yes

30 August 2024

Ms Kiersten Fishburn
Secretary
NSW Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street,
Parramatta NSW 2150.

Dear Ms Fishburn

Re: Bankstown TOD Submission - St Felix Catholic Parish, Primary School & De La Salle College

This submission has been prepared on behalf of the Catholic Parish of St Felix De Valois, Bankstown (**Parish**), to the Bankstown TOD rezoning proposal currently on exhibition.

Overarchingly, the Parish supports the aims and intent of the TOD Program, however, an opportunity is lost in the detailed planning of the St Felix precinct. The Parish has had discussions with Council and NSW Health Infrastructure regarding the provision of much needed housing (affordable and market) on the part of its land within 800m of the Bankstown station. Should this be adopted, the school is open to providing after-hours access to sports and recreation facilities under a suitable cost-sharing arrangement with Council.

This submission outlines the request of the Parish which seeks that its land is treated consistently with the surrounding land, namely:

- a 2.5:1 FSR control to the site;
- a 30m maximum height to the site;
- an additional local provision is inserted into Part 6 of the Canterbury-Bankstown LEP 2023 permitting residential development for the purposes of infill affordable housing to the site.

1.0 Introduction

The St Felix-De La Salle Bankstown site is owned by the Trustees of the Roman Catholic Church for the Archdiocese of Sydney (**TRRCAS**), and includes St Felix Catholic Church, St Felix Catholic Primary School and De La Salle Catholic College. The site neighbours the proposed Bankstown Hospital and TAFE site as identified in the below **Figure 1**.

This proposal relates to the southern part of the site being Lot 2 in DP 109612 (address 347A Hume Highway, Bankstown) serviced off Raw Avenue, which has been identified by government as potential open space operating under a shared-use agreement with the owners. This potential open space is beneficially owned by the Parish and does not form part of the operating licence agreement with De La Salle College.

The Parish has support from the College to develop its land for infill affordable housing to support the aims of the TOD Precinct, with affordable housing to support teachers, nurses and other key workers in Bankstown. The affordable housing would be delivered in partnership with a registered Community Housing Provider.

The future Bankstown Hospital masterplan has provided revised access to the site through a new north-south access road from French Avenue.



Figure 1: Lot 2, DP 109612. The Site, owned by the Trustees of the Catholic Church for the Archdiocese of Sydney, includes the Parish of St Felix De Valois, Catholic Primary School and De La Salle College.
Source: Six Maps

2.0 Strategic Context

2.1 Bankstown Hospital Masterplan

The NSW Government has committed \$1.3 billion and begun master planning the hospital precinct adjacent the CAS site. Health NSW notes that “*master planning will...explore how the new facility will integrate with the community and connect with local road and existing and future public transport networks*”¹. The proposal also includes an ongoing TAFE presence.



Figure 2: New Bankstown Hospital Site, adjacent CAS Site
Source: NSW Health, 2024

¹ [NSW Health Media Release](#), 2024.

2.2 Stakeholder Engagement

CAS have held separate discussions with Canterbury-Bankstown Council and NSW Health with regard to potential development opportunities at the site.

Council have acknowledged an openness to residential uses at the site, including for affordable rental housing, in exchange for delivering publicly accessible open spaces within the broader College precinct, subject to a cost-sharing arrangement.

We note that as the land is zoned SP2 Infrastructure, residential development for seniors housing purposes is permitted under Chapter 2 Part 5 of the Housing SEPP. The Parish is able to pursue this outcome, considering the site's proximity to the health cluster adjacent, however the preference is infill affordable housing given the current housing crisis.

3.0 Bankstown TOD and City Centre Master Plan

The site is identified throughout the draft Bankstown TOD rezoning proposal and Bankstown City Centre Master Plan² (BCC) as potential open space that could operate under a shared-use agreement. Specifically, the TOD and BCC plans propose that the southern-most part of the CAS site is made shared open space, as shown in Figure 3 and Figure 4.

Both plans note that negotiation with the owners (being TRRCAS beneficially owned by the Parish) would precede any shared-use agreement for the open space.

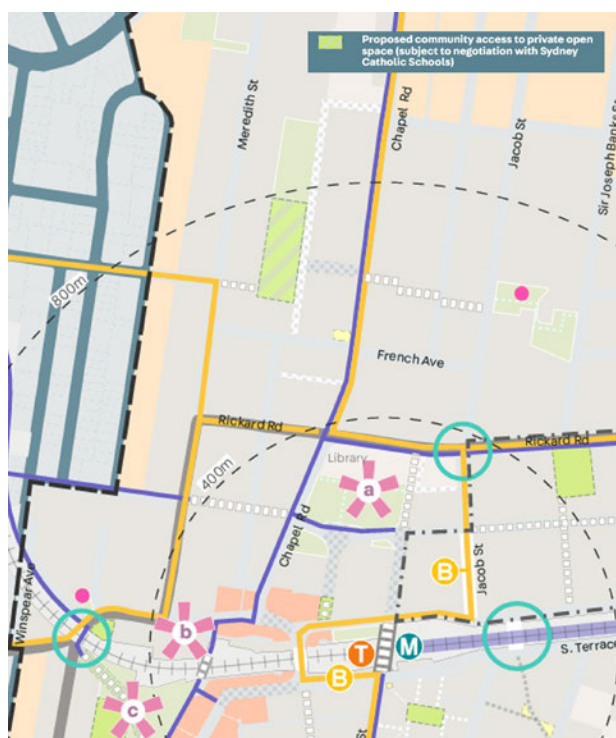


Figure 3: BCC Framework Map
Source: Draft Bankstown City Centre Master Plan, p. 5



Figure 4: Open Space Use Recommendations
Source: TOD Urban Design Framework, SJB, p. 47

The TOD EIE also notes at p. 18 that “*consideration will be given to options to incentivise the delivery of community infrastructure needs as part of the final SEPP amendment.*” We note that CAS is open to a process of negotiation that considers incentives to deliver the shared open space and connections as envisaged by the TOD and BCC plans.

Further, the Social Infrastructure, Public Domain and Open Space Assessment³ supporting the TOD rezoning proposal recommended “*continued consultation regarding shared-use arrangements*”, whilst also acknowledging that the La Salle College represented the largest open space opportunity within the Bankstown TOD.

Despite this, no engagement or consultation with TRRCAS was undertaken as part of the Social Infrastructure report.

² [Draft Bankstown City Centre Master Plan](#), 2021.

³ [Social Infrastructure, Public Domain and Open Space Assessment](#), 2024

The Parish and College would welcome opportunities to engage with Council to deliver open space through a shared access arrangement, subject to the changes sought to permit infill affordable housing on the southern section of the site being adopted.

3.1 Affordable Housing

The Bankstown TOD Rezoning Proposal has proposed a mandatory affordable housing contribution of 3–10% for all new residential development in the Precinct to deliver between 375–1,250 affordable homes that would be managed in perpetuity by a registered Community Housing Provider.

As described in Section 4.0 of this submission, the proposed redevelopment at the site would include up to 100% affordable housing, equating to approximately 290 dwellings. This represents almost a quarter (23.2%) of the total affordable housing that is proposed under the TOD rezoning. The Parish would partner with a tier one community housing provider such as Amelie Housing.

Considering Bankstown LGA has the following demographic profile, the delivery of affordable / key worker housing in this precinct is a key objective of the plan:

- In the City of Canterbury Bankstown, 28.5% of the population were renting privately, and 7.5% were in social housing in 2021.
- 39.4% of renting households were paying \$450 or more per week in rent in 2021. The LGA has a higher proportion of low income households (those earning less than \$800 per week).
- 64.8% of working residents of City of Canterbury Bankstown travelled outside the area to work and 58.1% of workers in Bankstown travel from outside the LGA.

4.0 The Proposal

It is proposed that a shared-use agreement is entered to facilitate new open space on the northern playing field, as partly envisaged by the TOD Rezoning and Bankstown City Centre master plans. Any such agreement would require that public use of the open space is restricted to outside of school hours only. The Parish and College are willing to enter a VPA agreement with Council to ensure the delivery of this public benefit offer subject to agreed terms, and if infill affordable housing is permissible on the site.

The Urban Design Framework supporting the TOD rezoning shows the part of the site that is proposed to be redeveloped as within the “inner neighbourhood” (800m from the future Metro station) as shown below in Figure 6. The framework seeks to concentrate and contain development around the urban core and inner neighbourhoods, with limited change to supporting neighbourhoods. Locating the proposed development to the southern part of the site will also result in better solar outcomes for the shared open space.

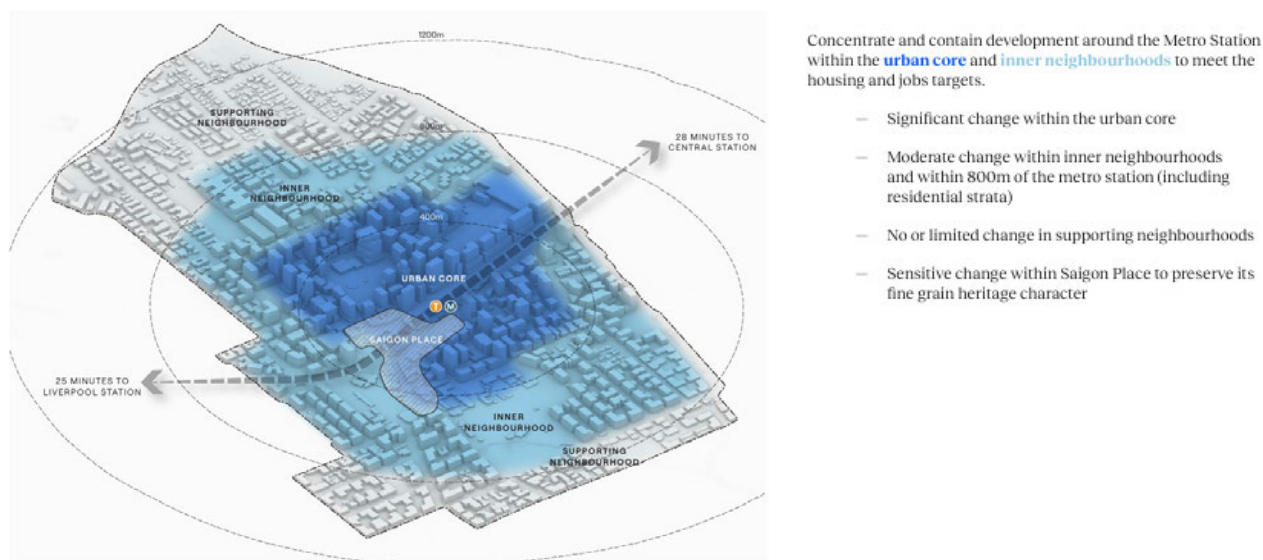


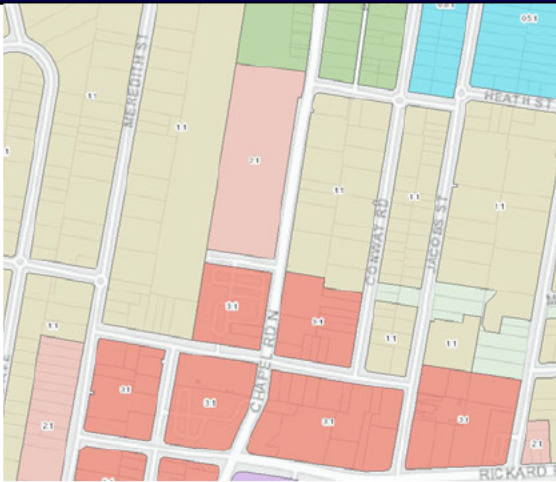
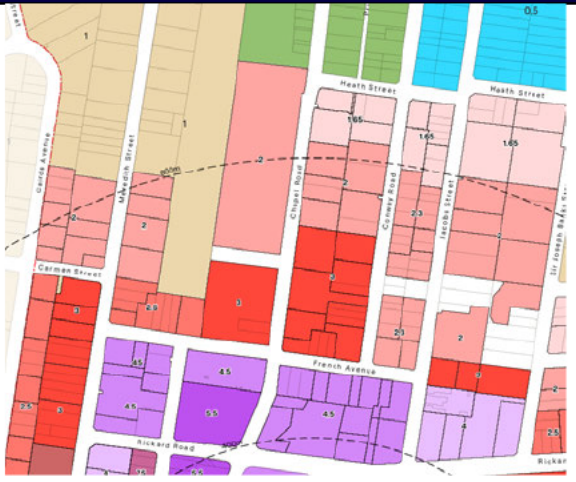
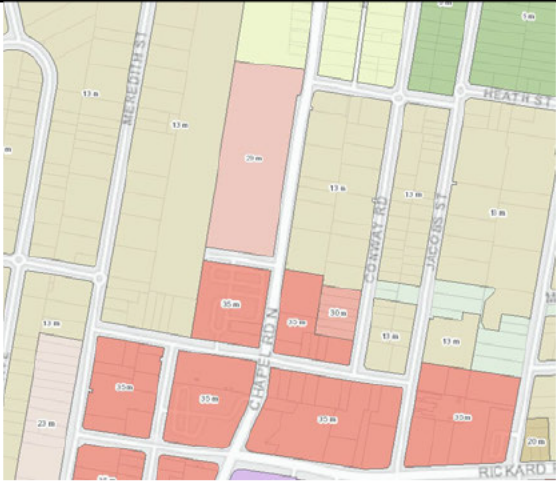
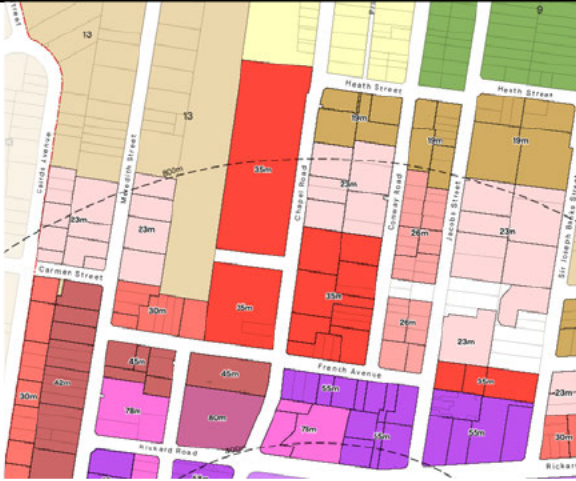
Figure 5: Transit Oriented Development, Urban Core and Inner Neighbourhoods
Source: TOD Urban Design Framework, SJB, p. 51

To offset the public benefit offer, and given the site’s strategic location adjacent the proposed Bankstown Hospital and TAFE, it is proposed that an approx. 1 Ha part of the site is redeveloped as up to 100% affordable rental housing development with approximately 290 dwellings.. These 290 dwellings represents almost a quarter of the total affordable housing proposed under the TOD rezoning.

4.1 Proposed Height and FSR

The TOD rezoning proposal does not upzone the permitted height or FSR at the site, based on the assumption that the site would be entirely open space. However, the sites surrounding the area proposed for affordable development has been upzoned, reflecting the “inner neighbourhood” location and proximity to Bankstown Station. For example, sites at the 800m ‘middle boundary’ of the TOD adjacent the site have been upzoned from 1:1 to 2:1 FSR and from 13m to 23m maximum height. Further, the sites immediately to the west and east of the site have been upzoned up to 3:1 FSR and 35m HOB. A comparison of the existing and proposed controls surrounding the site are provided in Table 1.

Table 1: Existing and Proposed Controls

Control	Existing	Proposed
Floor Space Ratio		
Height of Building		

As shown above, the proposed FSR and height at the site is inconsistent with the surrounding increased density within the inner neighbourhood. The proposed heights surrounding the site transition from 35m to 23m, with a ‘middle’ height of 30m. Similarly, the proposed FSR transitions from 3:1 to 2:1, with a ‘middle’ FSR of 2.5:1.

It is proposed that the site is rezoned to include a 2.5:1 FSR and 30m maximum height, commensurate to those neighbouring sites.

To facilitate affordable housing, it is also proposed that an additional local provision is inserted into Part 6 of the Canterbury-Bankstown LEP 2023 permitting residential development for the purposes of infill affordable housing to the site.

4.2 Concept Scheme

A concept infill affordable housing scheme has been prepared by Turner Studio and the Parish in consultation with Council and Health Infrastructure NSW. The development would provide amenity to the shared access public domain to the north and new hospital to the East. The hospital is planning a north south access road off French Avenue, and a public entry plaza on the south to facilitate pedestrian access from the town centre and Metro station.



Figure 6: Concept site plan and shared open space to the North
Source: Turner Studio



Figure 7: Concept scheme from the South East
Source: Turner Studio



Figure 8: Concept scheme from the South West
Source: Turner Studio



Figure 9: Concept scheme from the North West
Source: Turner Studio



Figure 10: Concept scheme from the North
Source: Turner Studio

5.0 Summary

The Parish welcomes the overall intent of the Bankstown TOD and supports the delivery of new homes and jobs proximate transport infrastructure. The Parish also welcomes the dual use of open space in the precinct.

Critical however, is the incentivisation of this dual use – as recognised in the supporting documentation to the draft TOD.

The Parish therefore welcomes the opportunity to work with the Department, NSW Health and the Council in enabling this, and seek the following amendment to the TOD:

- a 2.5:1 FSR control to the site;
- a 30m maximum height to the site.
- an additional local provision is inserted into Part 6 of the Canterbury-Bankstown LEP 2023 permitting residential development for the purposes of infill affordable housing to the site.

We thank the Department for the opportunity to work with the Parish and welcome the opportunity to work together moving forward. Please contact the below to meet and discuss next steps.

Yours sincerely,



Director



RAW AVENUE TOD SITE
BANKSTOWN NSW 2200

MASTERPLAN ENVELOPE STUDY

ISSUE FOR REVIEW
23 AUGUST 2024

TURNER

TURNER acknowledge the Darug/ Dharug people as the Traditional Custodians of the area known as Bankstown and their continuing connection to Country and culture.

— CONTENTS

1.0 BRIEF

2.0 SITE PHOTOS

3.0 ENVELOPE STUDY

—

1.0 BRIEF

The site is located at the end of Raw Avenue within the Canterbury Bankstown LGA and within 800m of the Bankstown Metro Station which has been identified as a TOD SEPP Tier 1 site.

The site is c.68m wide and 145m long, and approx 1ha in area. To the north of the site is a c. 1ha playing field for De La Salle Catholic College, to the west are Bankstown TAFE buildings of 2-7 storeys and an on-grade carpark, both of which have been identified as a future hospital site(s), to the east are 2-3 storey walk-up flat buildings, and to the south are single storey dwellings and 3-4 storey flat buildings.

Turner are to test the development capacity of the site for residential development that would include Affordable and Market housing, taking into consideration the proposed re-development of the Tafe site into a hospital and how the De La Salle Catholic College playing field could be provided with a more public interface.

— 2.0 SITE PHOTOS

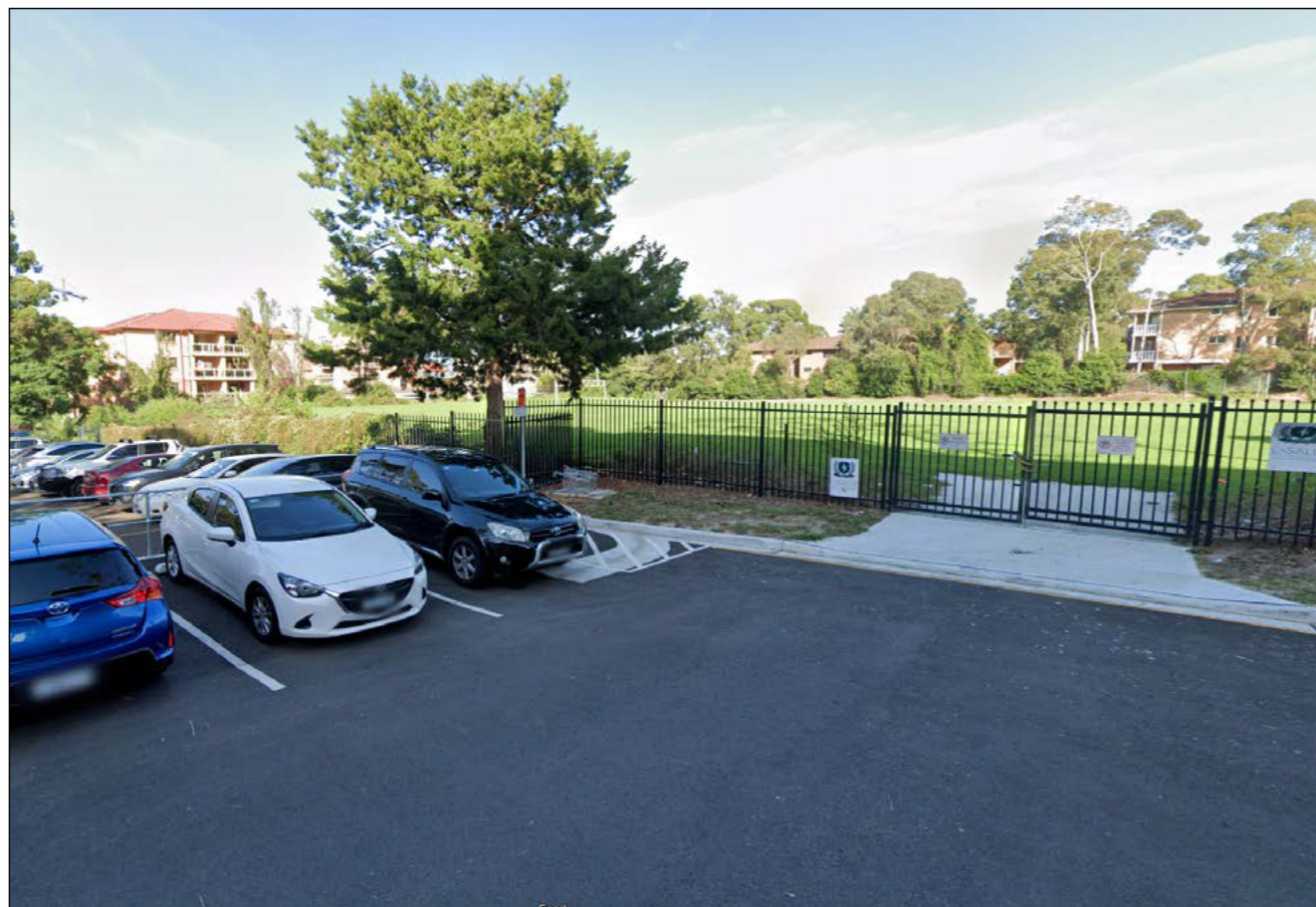
Site photos are taken from Google Streetview c. March and April 2021.



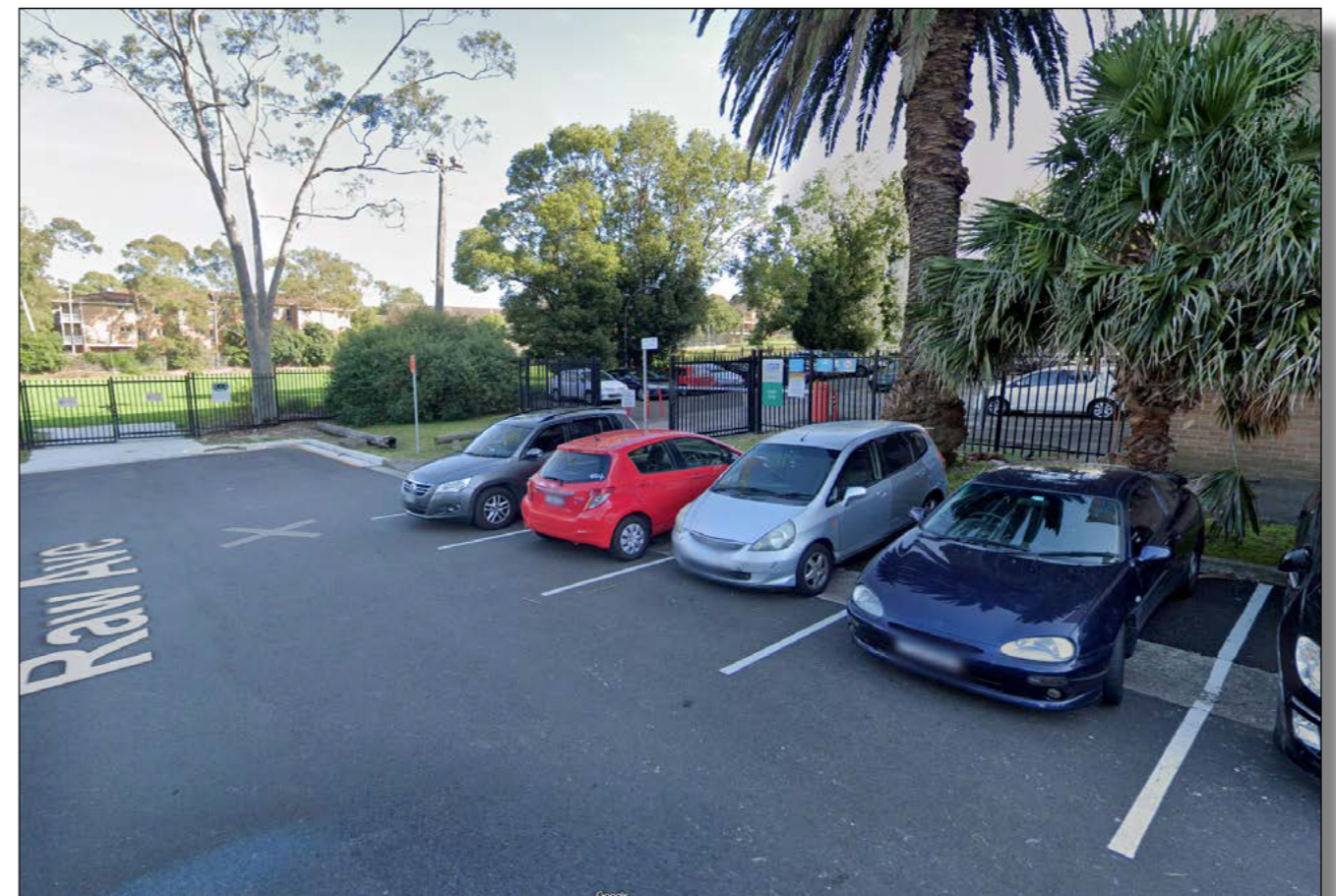
1. View east across the Tafe carpark



2. View east along Raw Avenue



3. View southeast from the end of Raw Avenue



4. View northeast at the end of Raw Ave

3.0 ENVELOPE STUDY

The Feasibility Built Form Envelope layouts are based on the following parameters:

Floor to Floor Heights

- 3.2m Residential typically, although we would add 0.1m for large setbacks such as the podium courtyard and under the roof level. Lift overruns of 1.5m and any roof plant are not shown in the massing scheme

Apartment mix, sizes and parking (max rates)

- 10% x Studio @ 40m² avg NSA
- 25% x 1 Bed @ 54m² avg NSA
- 50% x 2 Bed @ 77m² avg NSA
- 15% x 3 Bed @ 97m² avg NSA

Floorplates

- ADG setbacks of 9m from boundaries up to 8 storeys, increasing to 12m for the 9th storey
- Typical 20m deep Building Envelopes provide appropriate depth apartments with double loaded corridors, and cross-through apartments in locations
- Target ratios based on ADG guidance and experience is BEA:GFA 72%, and GFA:NSA 85%

Considerations

- There is an opportunity for the new road that extends from French Ave along the side of the playing field to connect back to Chapel Road towards the north



Areas BY: Usage

Area	GFA	NSA
BEA	34,192m ²	21,028m ²
Residential	24,789m ²	GFA: 24,789m ²



Residential

Unit Type	Percentage	Count
studio	10%	29
1 bed	25%	74
2 bed	50%	149
3 bed	15%	44
Total		296

Residents	Space/person	Carparks/person
574	21m ²	Oppa

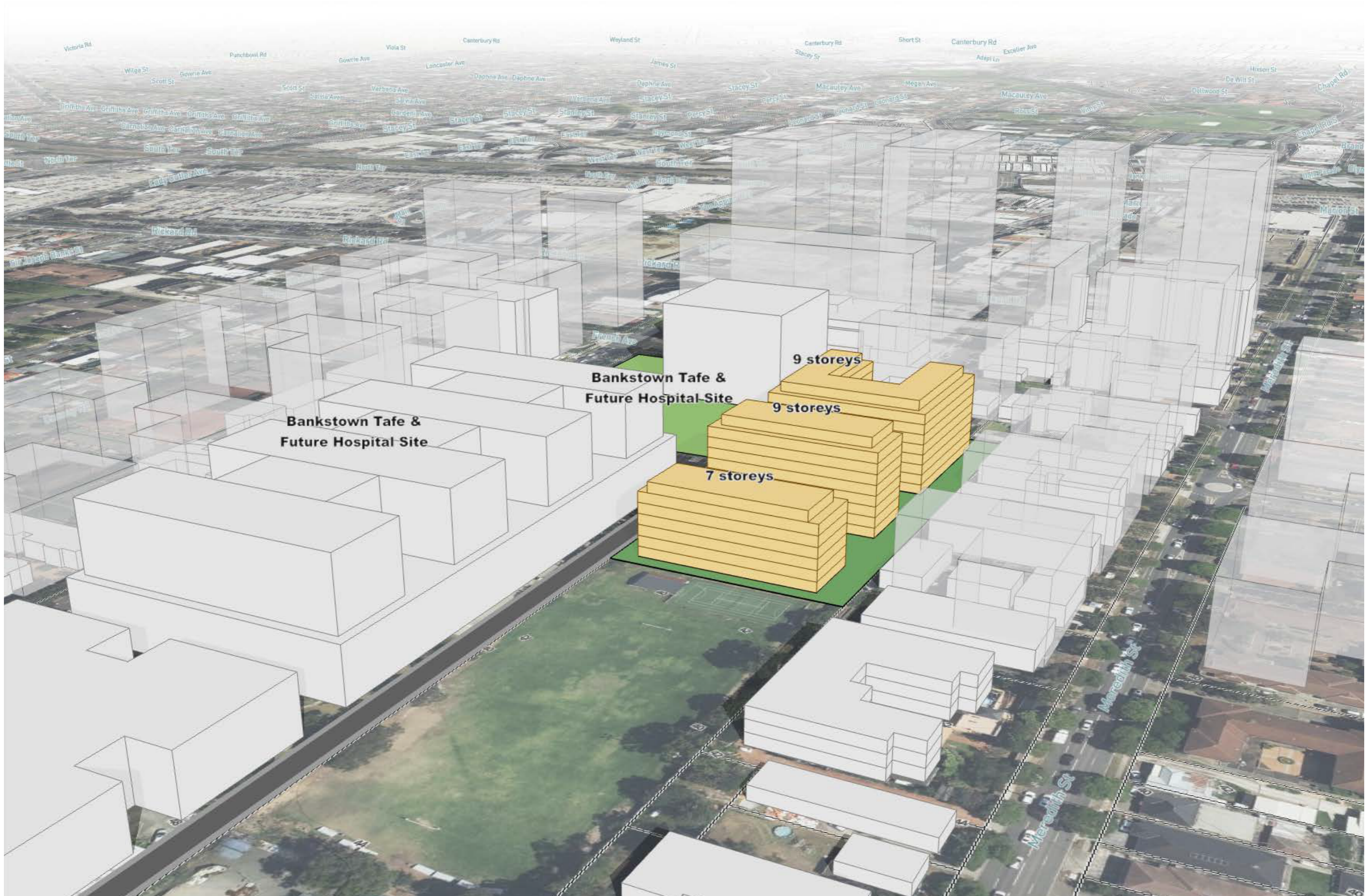




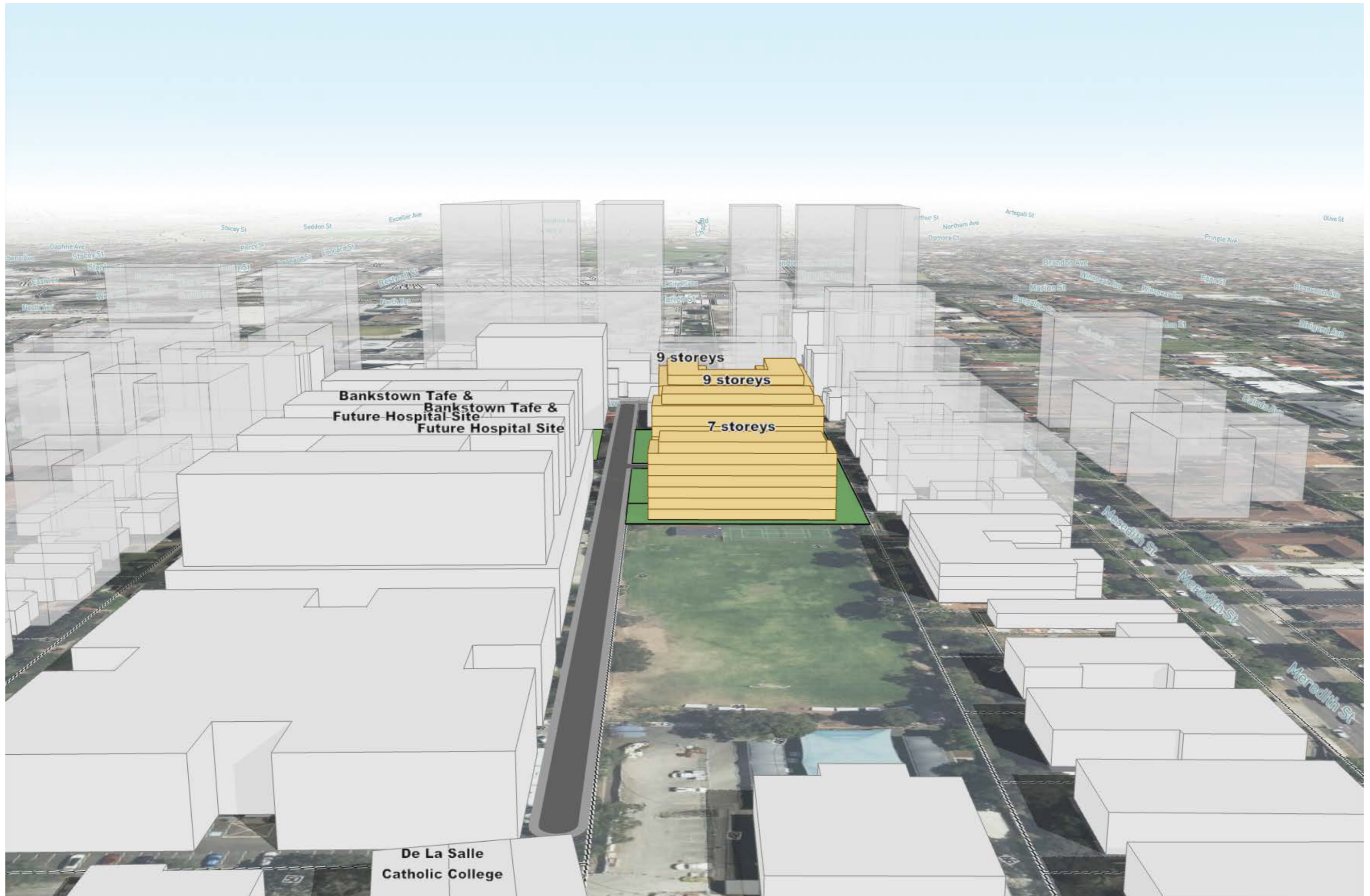
VIEW FROM SOUTHEAST | SK1.02



VIEW FROM SOUTHWEST | SK1.03



VIEW FROM NORTHWEST | SK1.04



VIEW FROM NORTH | SK1.05

From: [Planning Portal - Department of Planning and Environment](#)
To: [DPE Bankstown TOD Mailbox](#)
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Subject: Webform submission from: Bankstown TOD rezoning proposal
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Submitted on Fri, 30/08/2024 - 16:57

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Tejas

Last name

Puri

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

I am writing to formally object to the Bankstown TOD masterplan, as it appears to neglect several important factors critical to our community's well-being.

Bankstown's commercial centre is a key economic driver, offering a range of services and employment opportunities. To sustain and bolster its economic vitality, increased residential density in the surrounding areas is essential. More residents translate into higher demand for commercial services, which supports local businesses and stimulates economic growth.

Higher density encourages the development of mixed-use properties, integrating residential and commercial functions. This creates a more robust commercial environment, where businesses benefit from a steady flow of customers and increased economic activity. Additionally, it attracts new businesses to the area, fostering economic diversity and

creating additional opportunities for local entrepreneurs.

The increased economic activity resulting from higher-density development also supports investment in infrastructure and public amenities. This investment is crucial for the long-term success of the commercial centre and ensures that it remains a vibrant and attractive place for both businesses and residents.

The local shopping centres in Bankstown are pivotal for the community, providing essential goods and services while supporting local employment. To maintain and enhance their viability, it is imperative to increase the residential density in the surrounding areas. Higher density will lead to more foot traffic, which is crucial for driving sales and ensuring the financial stability of these centres.

A larger residential base will also attract new businesses and diversify the range of retail and service options available. This increased commercial activity will contribute to the economic health of the shopping centres, enabling them to offer a broader selection of goods and services and enhancing the overall shopping experience.

Furthermore, integrating higher-density residential developments with shopping centres can create mixed-use properties that combine living and retail spaces. This model not only maximises land use but also creates a more dynamic and accessible shopping environment, benefiting both residents and businesses in the area.

Bankstown is grappling with a critical housing shortage that affects many residents. To effectively address this issue, higher residential density is essential. Increasing density will provide additional housing units, alleviating pressure on the housing market and ofTo avoid detrimental impacts on our neighborhood, I urge you to address these concerns and revise the Masterplan to better balance development with community interests.fering more affordable options for a diverse range of residents.

Regards,
Tejas Puri

I agree to the above statement
Yes