



Planning &
Infrastructure

**MAJOR PROJECT ASSESSMENT:
Concept Plan Claymore
Renewal Project
(MP11_0010)**



Director-General's
Environmental Assessment Report
Section 75I of the
Environmental Planning and Assessment Act 1979

April 2013

ABBREVIATIONS

CIV	Capital Investment Value
Council	Campbelltown City Council
Department	Department of Planning & Infrastructure
DGRs	Director-General's Requirements
Director-General	Director-General of the Department of Planning & Infrastructure, or his delegate
EA	Environmental Assessment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPI	Environmental Planning Instrument
MD SEPP	State Environmental Planning Policy (Major Development) 2005
Minister	Minister for Planning and Infrastructure
OEH	Office of Environment and Heritage
PAC	Planning Assessment Commission
Part 3A	Part 3A of the <i>Environmental Planning and Assessment Act 1979</i>
PEA	Preliminary Environmental Assessment
PFM	Planning Focus Meeting
PPR	Preferred Project Report
Proponent	NSW Land and Housing Corporation
RtS	Response to Submissions
SEPP	State Environmental Planning Policy

Cover Photograph: 3D model view from Badgally Road looking north

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EXECUTIVE SUMMARY

This is a report for a concept plan application (MP11_0010) for the Claymore Urban Renewal Project in the south west region of Sydney made pursuant to the transitional arrangements of the former Part 3A of the *Environmental Planning and Assessment Act 1979*.

The NSW Land and Housing Corporation (formerly Housing NSW) (the proponent) is seeking approval to carry out an urban rejuvenation project over the 125 hectare site, increasing the number of dwellings from 1123 to 1490. The development will ultimately consist of 70 per cent private housing and 30 per cent public housing and will include new or upgraded urban infrastructure such as pathways, lighting, open space, community facilities, drainage and a series of new interconnecting public roads.

The proponent is seeking concept plan approval for a master plan of the site that will provide for 1490 dwellings to be delivered in 12 stages over 15 years. Each stage will be subject to an individual development application and the proponent has advised that they will enter into a Voluntary Planning Agreement (VPA) with Campbelltown City Council for the delivery of new or embellished urban infrastructure, including community facilities and public open space areas. The estimated project cost of the total development is \$300 million.

On 6 February 2011, the Executive Director, Major Projects Assessment, as delegate of the Minister, formed an opinion that the project is a major project under clause 13 of Schedule 1 of State Environmental Planning Policy (Major Development) 2005. The Minister is the approval authority. However, the Director-General has delegated his planning assessment functions in respect of the project to Campbelltown City Council as contained in an Instrument of Delegation dated 16 December 2010.

The proposal was placed on public exhibition for a period of 61 days from 16 November 2011 until 3 February 2012. The Council received a total of seven submissions from public authorities and 15 submissions from the public, inclusive of two petitions with 109 and 310 signatures respectively. Key issues raised by both public authorities and submissions from members of the public, include:

- impacts on native vegetation and ecological communities
- displacement of existing non Council community facilities such as the Baptist Church and Child Care Centre
- the location of the new town centre and the impact upon the existing Claymore Shopping Centre
- provision of suitable community facilities and public open space areas
- provision of adequate bus services and route
- impact of development on adjoining heritage items.

On 30 May 2012, the proponent amended details of the concept plan and provided further supplementary supporting documentation via the Preferred Project Report (PPR), to address issues raised in the agency and public submissions and by the Council including those listed above. The PPR included a revised Statement of Commitments.

The merits of the proposal have been assessed and it is determined that the impacts of the proposed development have been addressed via the proponent's Environmental Assessment, Preferred Project Report, the Statements of Commitments and the recommended modifications that include the retention of open space fronting Badgally Road and the removal of the proposed shopping centre at the corner of Badgally Road and Glenroy Road together with the retention of the existing shopping centre at Dobell Road. The concept plan application, with modifications, is supported because it will facilitate the orderly redevelopment of the Claymore public housing estate and is consistent with the objectives of the draft Southwest Subregional Strategy to promote increased housing provision and choice. The proposal also adequately addresses the Director-General's Requirements and all statutory requirements have been met.

On these grounds the site is suitable for the proposed development and the proposal will provide positive environmental, social and economic benefits to the region.

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1. BACKGROUND

1.1 The Proposal

The NSW Land and Housing Corporation (the proponent) proposes to undertake an urban renewal project within the Claymore housing estate, creating a new urban form with a new subdivision pattern and redevelopment of existing dwellings. The development will increase the number of dwellings within the project area from 1151 to 1490 dwellings and will ultimately consist of 70 per cent private housing and 30 per cent public housing. The final 447 public dwellings will consist of 140 retained cottages, 100 new senior living units and the construction of 207 new dwellings.

A new town centre is proposed as part of the project, which will be located adjacent to Badgally Road, opposite the Blairmount Primary School at the intersection of a new entry road. The town centre proposes a range of retail and community services, such as a supermarket, specialty shops, child care centre and multipurpose community centre. The project also includes new or upgraded urban infrastructure such as pathways, lighting, open space areas, drainage and a series of new interconnecting public roads.

The overall project vision is best expressed as follows:

"The people of Claymore desire a community that is vibrant, confident and safe. They desire access to services, shops, jobs and other opportunities that are taken for granted in other parts of Sydney. They have expressed a desire to actively support initiatives, and to build upon past initiative and success."

The renewal strategy for Claymore is based on the same principles that have been utilised for other urban renewal projects, such as Minto and Bonnyrigg (in the Fairfield LGA). The project is being undertaken using the Government's *Living Communities Model*, which is a model of estate renewal that pursues three distinct aims:

- Improve the housing and public spaces;
- Improve services and provide residents with better opportunities; and
- Support the local community to build its strengths, skills and overall capacity.

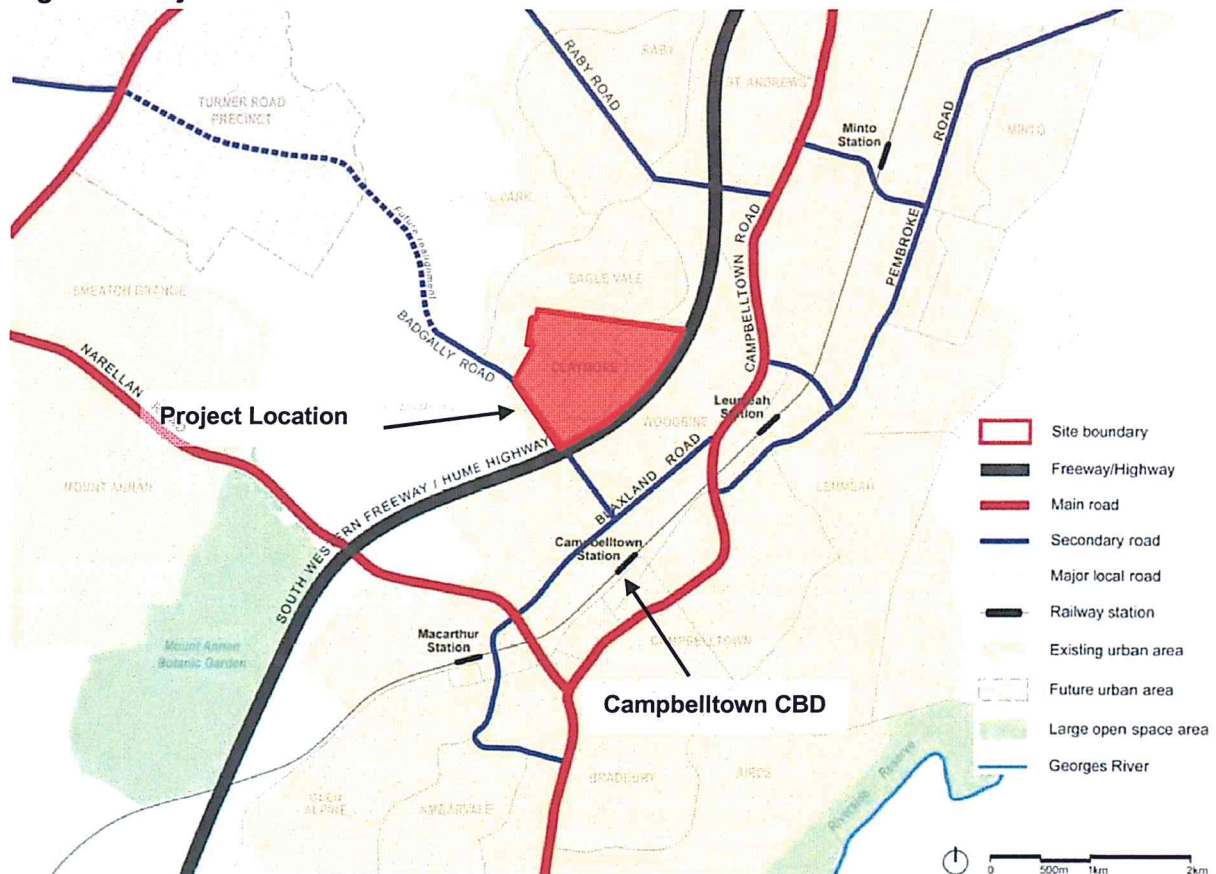
1.2 Site Location and Strategic Context

The Claymore estate was developed on 'Radburn' planning principles, primarily between 1979-1981. The Radburn style has proven to be an unsuitable planning strategy for public housing estates, given the back to front design of the housing, poorly connected and isolated walkways and open space areas, and the prevalence of super lots throughout the estate that diminishes the responsibility for maintenance and upkeep that individual ownership can bring.

The site is located 56km to the south west of Sydney and 2 kilometres North West of the city centre of Campbelltown, which is the regional city for the Macarthur district. It benefits from the provision of existing infrastructure with access to arterial and sub arterial roads and retail and service destinations within the Campbelltown city centre.

Campbelltown Hospital, Campbelltown Private and Macarthur Private Hospital are all located less than 2.5km from the site area. To the south are the University of Western Sydney and the South Western Sydney Institute of TAFE.

The project location is shown in Figure 1 below.

Figure 1: Project Location

1.3 Surrounding Land Uses

The site is located within an established urban area and is bound to the east by the Hume Highway (a freeway) and Badgally Road to the south. The suburb of Eagle Vale is to the north and west of the site. The site is generally disconnected from the residential areas east of the Hume Highway and has a poor relationship with the suburb of Blairmount, which is located on the southern side of Badgally Road.

The predominant built form and land use surrounding the site is low density residential development. The predominant built form within the estate is attached townhouses, which comprise 70 per cent of the housing stock within the estate. The individual residential allotments for the remaining single dwellings vary in size between 500 – 600 sqm. The NSW Land and Housing Corporation have already demolished a small number of dwellings within the estate.

The adjoining suburbs and land uses are illustrated in Figure 1 above. The map also shows the relationship of the site to retail and service destinations such as Campbelltown City Centre and nearby train stations, such as Campbelltown and Minto.

As part of further development within the south west growth centre, such as the Turner Road precinct in the Camden LGA, Badgally Road will be a significant link road. There is a current road reservation that caters for the widening of Badgally Road, and the proposed development does not encroach upon it. Campbelltown Council has and is continuing to investigate options for the extension of Badgally Road over the railway line, directly into the Campbelltown city centre.

1.4 Current and former land uses

The site is bounded by the Hume Highway to the east, Badgally Road to the south and the suburb of Eagle Vale to the north and west. The three main elements of the estate include:

- the existence of large open space areas within the middle of the site and in-between concentrations of attached dwellings
- the predominance of public housing within the estate
- the location of the shopping centre on the northern edge of estate, within close proximity of Eagle Vale
- the disconnected nature of the estate from its neighbours, with poor connectivity to adjoining areas.

The existing Claymore shopping centre caters primarily for the convenience needs of nearby residents with its current role to provide 'top up' convenience needs to the community. The shopping centre is located towards the northern periphery of the Claymore estate, and is located on the main loop road through the estate, Dobell Road.

Campbelltown Business Centre Strategy (prepared by Hill PDA in 2005) and the NSW Department of Planning and Infrastructure's 'Draft Southwest Subregional Strategy' identify Claymore as a neighbourhood centre. Claymore shopping centre consists of a small supermarket, pharmacy, medical centre, bottle shop and several other small specialty shops.

Claymore is served by the Claymore Public School and a neighbourhood centre for the local residents. Council operates a child care centre (Waratah Cottage), which is located adjacent of the shopping centre.

There are a number of other non-government community facilities operated within the site, including the Baptist Church and the Guardian Angels Child Care Centre which is operated by the Baptist Church. Directly to the north-west of the study area are Eagle Vale High School, St Mary's Catholic Primary School and Eagle Vale Central Aquatic and Fitness Centre. Blairmount Primary School is located on the southern side of Badgally Road within walking distance of Claymore.

1.5 Natural site features

The site consists of undulating terrain with a defining ridge running along Badgally Road. There are several high points located within the southern and middle portions of the site, with the low points generally contained within the riparian and creek line areas towards the north of the site.

The aerial map depicts the pockets of open space that dominate parts of the site, with the majority of the open space internalised. The main ecological communities within the site are highly disturbed. The site features are depicted in the Figure 2 below.

1.6 Existing properties and land ownership

The site comprises the properties contained within Figure 3 below. Within this area there are 28 properties in private ownership (coloured purple) which are predominantly located towards the north of the site. No development is proposed on these sites and they do not form part of the land to which the concept plan application relates.

Campbelltown City Council owns approximately 18 hectares of open space land, which forms part of the project. Open space land within the project area will be reconfigured and embellished as part of the renewal project. It should be noted that Council has decided to retain certain existing public open space located within the project area that has frontage to Badgally Road. This will necessitate reconsideration of parts of the proposed precinct layout. Remaining vacant and open space land within the project area that is owned by the NSW

Figure 2: Existing Site Features (Source: www.nearmap.com)



Figure 3: Land Ownership

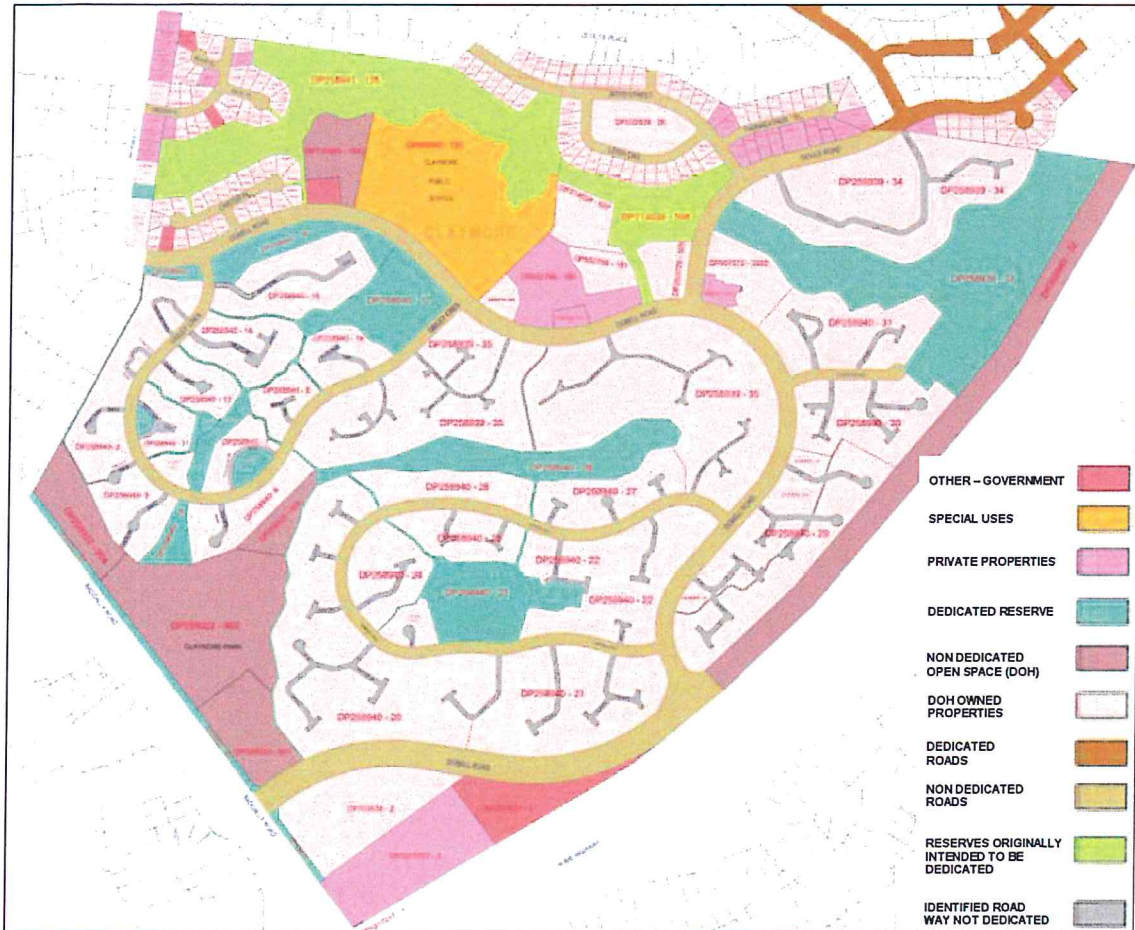


Figure 4: Existing Site Conditions



2. PROPOSED PROJECT

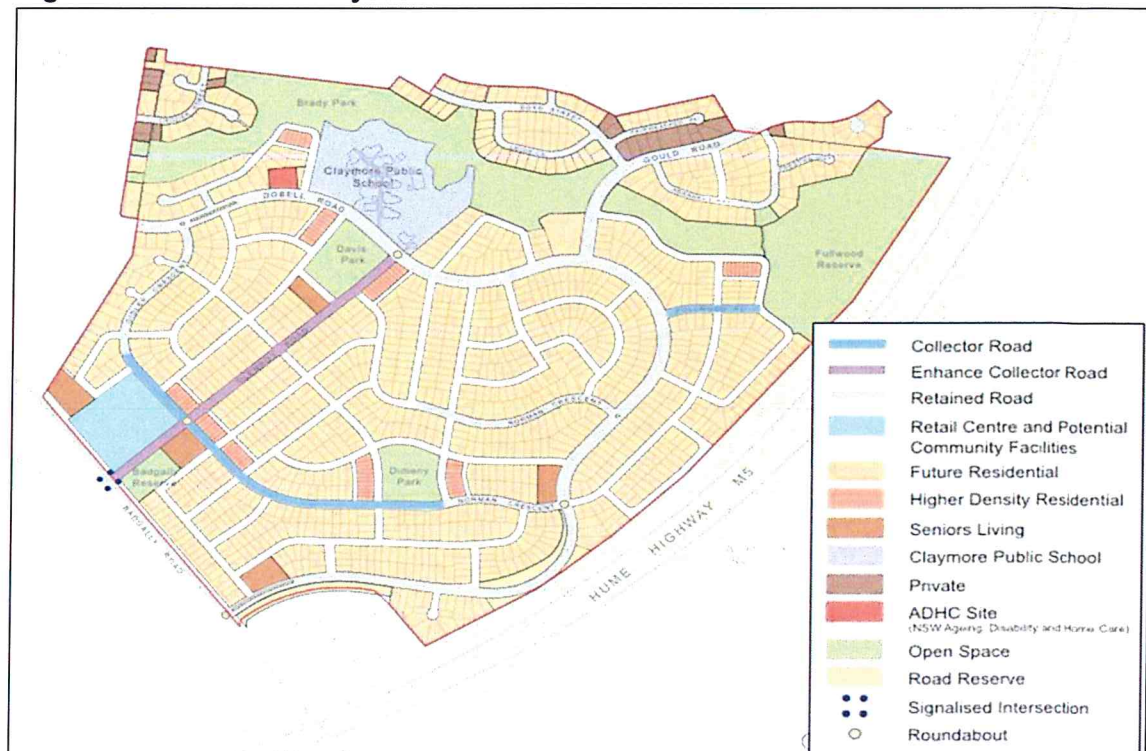
2.1 Concept Plan Proposal

The project involves the long term urban renewal of the public housing estates of Claymore, increasing private dwellings from 2 per cent up to 70 per cent of the estate over the project lifecycle of approximately 15 years. The key components of the project are listed in Table 1.

Table 1: Key Project Components

Aspect	Description
<i>Project Summary</i>	The renewal of the Claymore public housing estate through the establishment of a new urban structure and new street pattern with a subdivision layout based around a series of existing and new roads with an increase in dwelling numbers from 1,123 to 1,490.
<i>New urban structure</i>	Establishment through urban renewal of a new urban structure including: <ul style="list-style-type: none"> • Introduction of a new street hierarchy with a series of new interconnecting streets • Provision of an additional 100 senior living units • The construction of approximately 1,250 new dwellings • Retention of approximately 140 public dwellings • Development to occur over 15 years in 12 stages
<i>Housing mix</i>	The increased number of dwellings will be 30 per cent public housing and 70 per cent private housing on lots sizes varying from 200 sqm up to 500 sqm.
<i>Social and physical urban infrastructure</i>	New and upgraded roads, utility services, parks and community facilities in association with the new residential development.
<i>Demolition</i>	Demolition of approximately 948 dwellings and associated redundant infrastructure. Note: NSW Land and Housing Corporation have already demolished approximately 35 dwellings within the project area under existing approvals.
<i>Town centre</i>	The provision of a new town centre precinct, with new interconnecting roads, and the integration of community facilities and the removal of the existing shopping centre.

The project layout is shown in Figure 5.

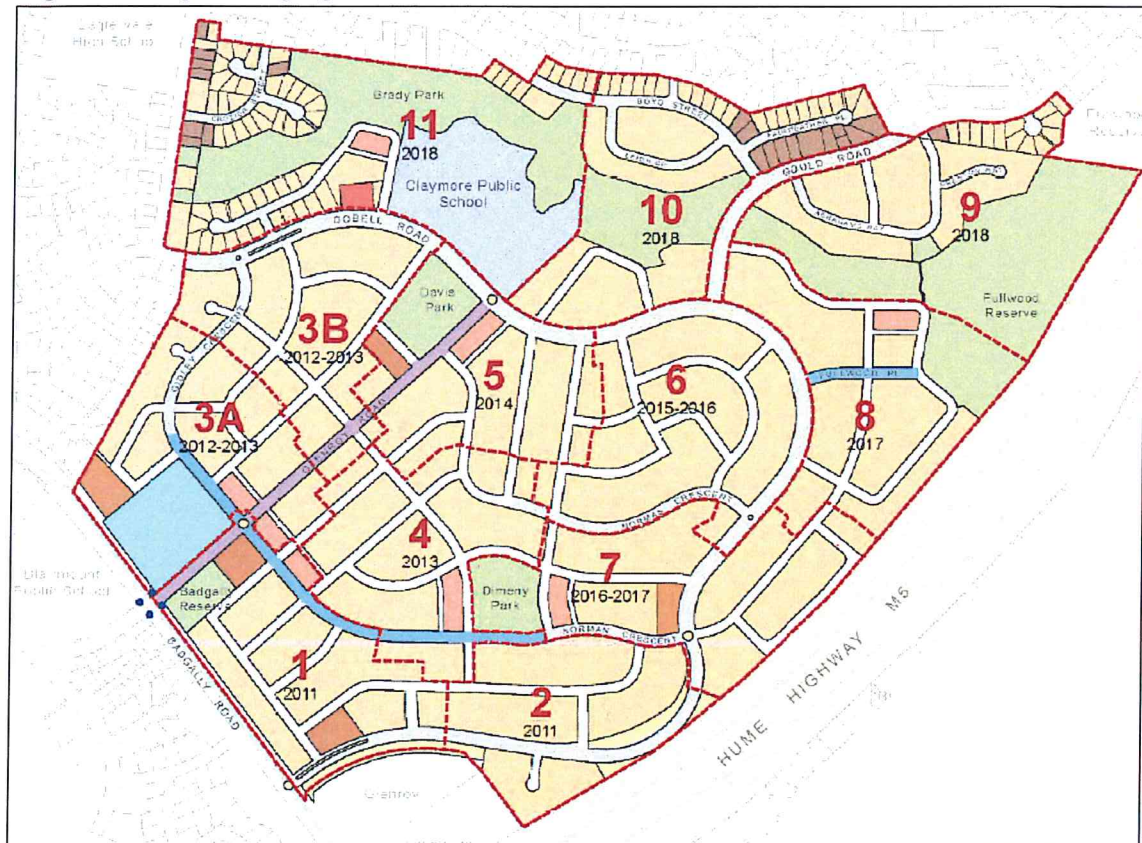
Figure 5: Concept Plan Layout**Figure 6: Indicative Lot Layout**

The concept plan layout illustrates the significant extent of the renewal project, with the vast majority of the existing streets being removed within the site. The grey shaded roads are proposed to be retained, which in essence are the spine or link roads throughout the estate, with all other roads being new constructed roads. A new lead-in road is proposed to be built from Badgally Road, to provide a more direct through route in the north-south direction. This intersection will be signalised.

Figure 6 above illustrates the proposed lot layout and its relationship to existing or retained cottages. It also shows the proposed seniors living sites. As part of the development, the cottages to be retained will be progressively improved with building amendments such as façade upgrades, fencing, landscaping and provision of awnings or new windows. This does not form part of the concept plan and is currently being undertaken as part of the NSW Land and Housing Corporation 'Community Renewal Strategy'.

The project is proposed to be delivered in 12 stages over approximately 15 years. The indicative staging plan for the project is provided in Figure 7.

Figure 7: Project Staging Plan



2.2 Project Need and Justification

The draft Southwest Subregional Strategy for the south western region of Sydney identifies a demand for additional housing within established areas. The dwelling targets for the south west region for the period 2006 - 2036 are 155,000 dwellings. Incorporated into the Regional Plan and Metropolitan Plan for Sydney 2036 is recognition of the need to also provide an increasing choice and diversity of housing. The Claymore project will provide an additional 367 dwellings (approximately 30 per cent increase) over its delivery lifecycle, as well as providing a greater diversity of attached and detached dwelling forms.

From a social perspective the project aims are to achieve government objectives and NSW Land and Housing Corporation policy, which is to introduce a mix of private ownership (approximately 70 per cent of the estate) within public housing estates (retain 30 per cent) to create a sustainable, diverse and safe community. Other identified benefits of the renewal of public housing estates include:

- greater workforce participation of future residents
- economic multiplier effect of investment through greater confidence
- lower crime levels

- reduced stigma for residents.

The NSW Land and Housing Corporation intend on replacing the public housing dwellings lost from the estate within the Greater Western Sydney region over the life of the project to align with its projected public housing client needs and the need to maintain the total stock of public housing in the area. Within the Statement of Commitments is the implementation of a rehousing process for residents.

2.3 Concept Plan

NSW Land and Housing Corporation has applied for approval of a concept plan under section 75M of the EP&A Act. The application seeks approval of a master plan for the site, which identifies the land use structure of the renewal project. Further development applications, lodged under Part 4 of the Act, will be required for each of the subsequent 12 stages of the renewal project.

2.4 Preferred Project Report

On 30 May 2012 the proponent amended details of the concept plan and provided further supplementary supporting documentation via the Preferred Project Report (PPR), to address issues raised in the agency and public submissions and by the Council. The issues covered in the PPR included:

- continued presence of the Baptist Church and Guardian Angels Child Care Centre
- the existing and future retail centre
- preferred bus route
- protection of heritage
- proposed Development Control Guidelines
- biodiversity off sets.

The PPR included a revised Statement of Commitments.

3. STATUTORY CONTEXT

3.1 Major Project

The then Minister for Planning declared the proposal a Major Project under Part 3A of the Environmental Planning and Assessment Act 1979 (EP&A Act) because it is development for the purpose of residential, commercial or retail development with a construction investment value of more than \$100 million, under clause 13, Schedule 1 of the Major Development SEPP. The Minister also authorised the submission of a concept plan for the project under section 75M of the Act.

The Director-General of the Department of Planning and Infrastructure delegated the assessment of the Concept Plan to Campbelltown City Council on 28 August 2011 under section 23(1)(d) of the Act.

Part 3A of the EP&A Act, as in force immediately before its repeal on 1 October 2011 and as modified by Schedule 6A to the Act, continues to apply to transitional Part 3A projects. Director-General's environmental assessment requirements (DGRs) were issued in respect of this project prior to 8 April 2011 and the project is therefore a transitional Part 3A project.

Consequently, this report has been prepared in accordance with the requirements of Part 3A and associated regulations, and the Minister (or his delegate) may approve or disapprove of the Concept Plan under section 75O of the Act and approve or disapprove under section 75P of the Act the carrying out of any stage of the project under section 75J of the Act without further environmental assessment.

3.2 Delegated Authority

On 27 February 2013, the Minister has delegated his functions to determine concept plan applications under Part 3A of the Environmental Planning and Assessment Act 1979 to the Executive Director, Development Assessment Systems & Approvals where:

- the project the subject of the application is consistent (in the opinion of the delegate) with the Metropolitan Plan for Sydney or the relevant Regional Strategy or Sub-Regional Strategy prepared by the Department of Planning and Infrastructure and endorsed by the Minister, and
- the relevant local council has not made an objection, and
- a political disclosure statement has not been made, and
- there are less than 25 public submissions in the nature of objections.

In this respect, Campbelltown City Council have made separate representations, dated 15 February 2013, to the department detailing their support for the retention of the existing Claymore shopping centre and that Council does not support the proposed new retail centre fronting Badgally Reserve as proposed within the concept plan. This will necessitate revision of part of the concept plan.

Whilst Council notes that a key objective of the proposed Claymore Urban Renewal project is the provision of a new site for an alternative retail centre that will help create a renewed focal point for the suburb, council holds the view that a satisfactory outcome can be achieved by the retention of the existing shopping centre. For the purposes of the Minister's delegations, council's opposition to the proposed new retail centre is taken to be an objection and accordingly, pursuant to item 2 of the Minister's delegation, the Minister is the consent authority for the concept plan proposal.

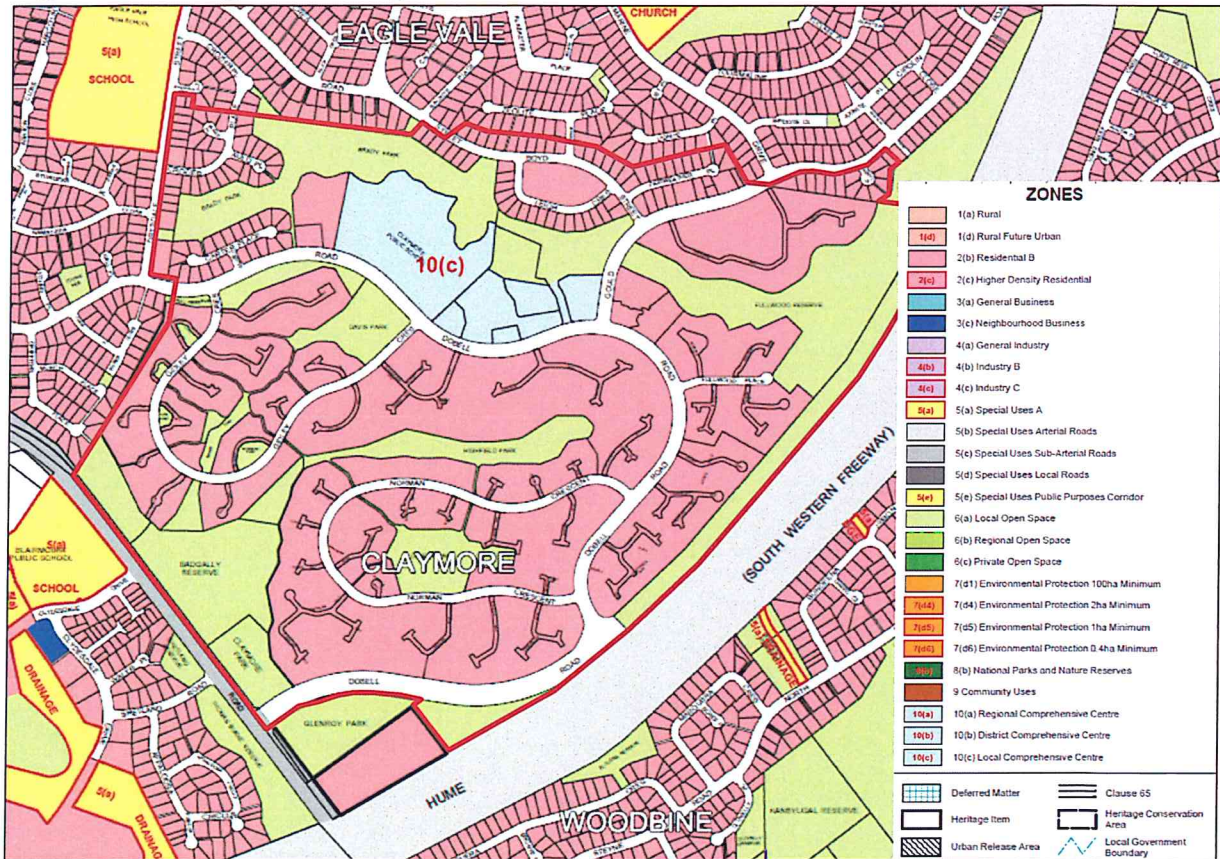
3.3 Permissibility

Under Campbelltown (Urban Area) Local Environmental Plan 2002, the predominant zone within the subject site is 2(b) – Residential which covers the existing residential areas of Claymore. Other zones include the 10(c) Local Comprehensive Zone which covers the existing town centre and adjoining Claymore Primary School and 6(a) Local Open Space.

The various zones are illustrated in Figure 8 below.

Because the concept plan envisages a different land use layout than currently exists, the proposed development is partially prohibited by the current zoning of Campbelltown LEP. However, the site is not located within an environmentally sensitive area of State significance or a sensitive coastal location and therefore the concept plan application can be approved despite the current zoning, under the terms of Section 75O(3) of the EP&A Act and Clause 8N of the EP&A Regulation.

It is intended that the zoning will be amended as part of Campbelltown's comprehensive LEP process to make the proposal consistent with the terms of any approved concept plan for the site. The proponent has lodged a planning proposal with Council to this effect. The proponent has also requested that the Minister make a determination pursuant to S75P (2)(c1) that the provisions of Campbelltown LEP not have any effect in relation to restricting the carrying out of the concept plan.

Figure 8: Existing Land Zoning

3.4 Environmental Planning Instruments

Under Sections 75(2)(d) and 75(2)(e) of the EP&A Act, the Director-General's report for a project is required to include a copy of, or reference to, the provisions of any State Environmental Planning Policy (SEPP) that substantially governs the carrying out of the project, and the provisions of any environmental planning instruments (EPI) that would (except for the application of Part 3A) substantially govern the carrying out of the project and that have been taken into consideration in the assessment of the project.

Consideration of relevant SEPPs and EPIs is provided in Appendix D.

3.5 Objects of the Environmental Planning and Assessment Act

Decisions made under the EP&A Act must have regard to the objects of the Act, as set out in Section 5 of the Act.

The objects of the Act are:

- (a) to encourage:
 - (i) the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,
 - (ii) the promotion and co-ordination of the orderly and economic use and development of land,
 - (iii) the protection, provision and co-ordination of communication and utility services,
 - (iv) the provision of land for public purposes,
 - (v) the provision and co-ordination of community services and facilities, and

- (vi) the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and*
 - (vii) ecologically sustainable development, and*
 - (viii) the provision and maintenance of affordable housing, and*
- (b) to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and*
- (c) to provide increased opportunity for public involvement and participation in environmental planning and assessment.*

The Council has considered the Objects of the EP&A Act in the assessment of the concept plan application and concluded that the Concept Plan does not raise significant issues with regards to the objectives of the Act.

It finds that the proposal is consistent with the objects of the Act and provides an efficient utilisation of land that responds to the environmental constraints of the site. Importantly, through the execution of a VPA, the project will deliver embellished and improved community facilities and open spaces area which will complement and service the increased residential population resulting from the renewal project.

3.6 Ecologically Sustainable Development

Ecologically Sustainable Development (ESD) has the same meaning within the EP&A Act as that found in the Protection of the Environment Administration Act 1991. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of the following principles:

The Precautionary Principle

This means that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The Environmental Assessment for this project is supported by technical and environmental reports that conclude that the proposal's impacts can be successfully mitigated. No irreversible or serious environmental impacts have been identified. The concept plan approval requires additional information at each stage of development to ensure the proposal's extent and nature is fully documented, and opportunities are provided for proposed mitigation and management measures to minimise the impact of the development, such as off-setting. Further, the project approval requires mitigation and management measures to minimise the impact of the proposed development.

Inter-Generational Equity

Through implementation of the concept plan and environmental management practices, the environment is protected for future generations. The benefits of the proposal include the provision of embellished open space with the protection and rehabilitation of core ecological habitat within the riparian zone. The development also improves the social integration of the development with the broader Campbelltown community through increasing the private ownership of dwellings within the locality while at the same time ensuring that those that remain reliant upon public housing are re-housed appropriately. The new urban structure with interconnecting streets will also increase connectivity and proximity of dwellings to the new town centre, adjoining suburbs and public transport.

Conservation of Biological Diversity and Ecological Integrity

It is considered that the proposed protection of native vegetation within the bushland areas and the proposed off-set plantings will maintain or improve biodiversity values and the long-term viability of a local population of species, population or ecological community or their

habitat. It will also facilitate the protection of a substantial area of critically endangered ecological community. It should be noted that Council has decided to seek to retain the public open space fronting Badgally Road which contains, in part, some existing remnant vegetation.

Improved Valuation, Pricing and Incentive Mechanisms

The cost of measures to mitigate and manage, on an ongoing basis, any potential impact of the proposed development of the site, has been incorporated into the Capital Improvement Value of the project. Thus, the developer will bear the cost of these measures. It is difficult to assign a monetary value to environmental assets that have not previously been commodified.

3.7 Statement of Compliance

In accordance with section 75I of the EP&A Act, the Council is satisfied that the Director-General's environmental assessment requirements have been complied with.

3.8 Environment Protection and Biodiversity Conservation Act

The Commonwealth's Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) commenced on 16 July 2000. Under the assessment and approval provisions of the EPBC Act, actions that are likely to have a significant impact on a matter of national environmental significance are subject to an assessment and approval process. An action includes a project, development, undertaking, activity, or series of activities.

The Act identifies seven matters of national environmental significance:

- World Heritage properties;
- National Heritage places;
- Ramsar wetlands of international significance;
- Nationally listed threatened species and ecological communities;
- Listed migratory species;
- Commonwealth marine areas; and
- Nuclear actions (including uranium mining).

There are no relevant World Heritage properties, National Heritage places, Ramsar wetlands, Commonwealth marine areas or Commonwealth lands on the site. The only matters of national environmental significance of potential relevance to the site relate to the potential for a limited number of endangered ecological communities, such as Cumberland Plain Woodland (CPW) and River Flat Eucalyptus Forest. No nationally listed threatened species or ecological communities were recorded on the site.

The Claymore Renewal Project was referred to the Commonwealth Minister for Environment and Heritage under the EPBC Act. The Commonwealth have declared that the project is not a 'controlled activity action' and the proponent requires no further action under the EPBC Act.

4. CONSULTATION AND SUBMISSIONS

4.1 Exhibition

Under section 75H(3) of the EP&A Act, the Director-General is required to make the Environmental Assessment (EA) of an application publicly available for at least 30 days. After accepting the EA, Campbelltown City Council publicly exhibited it from 16 November 2011 until 3 February 2012 on the department's and Council's website and at the Department of Planning and Infrastructure, Information Centre (Bridge Street, Sydney), Campbelltown City Council, HJ Daley Library (Campbelltown), Eagle Vale Central Library and on-site at the NSW Land and Housing Corporation office at Claymore. The Council also advertised the public exhibition in the Sydney Telegraph on 16 November 2011, the

Macarthur Chronicle, Macarthur Advertiser and notified residents, local community groups and relevant State authorities in writing.

Council received 22 submissions during the exhibition of the EA – seven submissions from public authorities and 15 submissions from the general public and special interest groups.

Of the 15 submissions received from members of the public, only one from the owner of the existing Claymore Shopping Centre, could be considered to be an objection to the renewal project. This was for the dual reasons of losing the business zoning of his site and the proposal to develop an alternative shopping centre site. The other 14 submissions did not object to the project but nonetheless raised concerns or issues for further consideration. Included in the submissions were two petitions containing a total of approximately 420 signatures. In accordance with the Instrument of Delegation dated 28 September 2011 by the Minister, a petition is only counted as one submission.

The NSW Land and Housing Corporation, in conjunction with Council Officers and Landcom representatives also held three public information sessions when the concept plan was on public exhibition. These sessions were held on 23 November 2011.

A summary of the issues raised in submissions is provided below.

4.2 Public Authority Submissions

Seven submissions were received from public authorities. None of the agencies objected to the development, but raised issues and requested further information or clarification regarding certain aspects of the development. A summary of the issues raised and details of how these issues have been addressed, is provided in Appendix E. Issues raised by State agencies were also addressed in the proponent's Preferred Project Report.

4.3 Public Submissions

A total of 15 public submissions were received during the exhibition period, including two from special interest groups of the Baptist Church and the Guardian Angels Pre-school.

Of the 15 public submissions, 14 did not object outright to the project but raised concerns regarding components of the development. One submission that primarily related to loss of bushland throughout the estate was supported by a 109 signature petition. The key issues raised in public submissions are listed in Table 2 below.

Table 2: Summary of Issues Raised in Public Submissions

Issue	Proportion of submissions (%)
That the concept plan does not retain the existing Baptist Church and Guardian Angel Pre-School. Submissions identified the important contribution that both facilities made to the social fabric of the locality.	77
Potential loss of bushland, particularly Cumberland Plain Woodland from the Badgally Road precinct	14
Potential removal of bushland and native vegetation generally across the site	14
Provision of more seniors housing development and accessible housing forms	14
Claymore should be renamed, reflecting the renewed and redeveloped nature of the project.	14
Increased traffic calming devices should be incorporated into the redevelopment plans to restrict speeding and inappropriate drivers.	14
Should look at increased use of surveillance cameras or other methods/devices to prevent and discourage anti-social behaviour within public parks, particularly Brady park.	7

Issue	Proportion of submissions (%)
Retain the suburb's name as Claymore due to historic reasons	7
Should have increased provision of community facilities, specifically, a new police station, indoor sports centre	7
The redevelopment provides an opportunity to provide good quality housing on larger allotments	7
The current location of the town centre is preferred as it is centrally located and offers the maximum community benefit	7
The existing town centre has redevelopment plans it wishes to pursue and therefore it should be retained in its current location	7

The majority of the issues raised by residents centred around the removal of the Baptist Church and child care centre. This exhibits a strong concern for the social fabric of the locality rather than any concern about potential negative impacts upon the physical or natural environment. The matter has been addressed by the proponent in their PPR, where they indicate that negotiations have commenced with the Baptist Church with a view to their continued presence in Claymore. However, it is noted that the Statement of Commitments is silent on this issue. It would not be unreasonable to include a concept plan modification requiring the proponent to ensure provision of a satisfactory site for these uses to continue as part of the renewal project.

The other issue arising from the exhibition that was of concern to a number of people was the potential loss of open space, particularly the vegetation community, Cumberland Plain Woodland that is present within Badgally Reserve. This issue is considered in Section 5 of the report. In brief, the existing ecological community is degraded and replacement planting of CPW will occur within the riparian zone to the north of the site. There will also be a biodiversity off-setting strategy which will provide new planting to off-set the loss of the ecological community. Notwithstanding, council has decided to seek to retain the public open space with frontage to Badgally Road and therefore remnant vegetation is proposed to be retained.

The other significant issue, although not raised by many people, is the relocation of the shopping centre. This issue is discussed in more detail in Section 5 of the report.

4.4 Proponent's Response to Submissions

The proponent provided a response to the issues raised in submissions (see Appendix C). In some cases, amendments were made or commitments were made to provide further information. Justification was provided in those instances where the proponent did not agree with the submission. A revised Statement of Commitments was also provided.

The proponent's Response to Submissions also included a Preferred Project Report that sets out the changes made to the original proposal or justifies why changes are not proposed.

It is clear from these documents that issues raised during the public exhibition process have been considered with an appropriate level of thoroughness.

Amendments undertaken by the proponent arising as a result of the exhibition process include:

- clarification on status of a number of local streets
- town centre layout
- preferred embellishment of open space areas
- amended heritage impact statement to protect *Glenroy* and *Hillcrest*
- supplementary information relating to biodiversity
- further information on dwelling typologies and development control guidelines

- discussion and justification for preferred bus route
- recognition of the importance of the continued presence of Baptist Church and child care centre.

Council would also seek amendments to the concept plan to accommodate its resolution to:

- retain the public open space fronting Badgally Road, and
- remove the proposed shopping centre at the corner of Badgally and Glenroy Roads and replace it with the retention of the existing shopping centre at Dobell Road.

5. ASSESSMENT

The key environmental/planning issues for the project are considered to be:

- Urban design and future development guidelines
- Existing and proposed retail centre
- Biodiversity
- Traffic, transport and accessibility
- Social infrastructure and services
- Provision and embellishment of open space
- Indigenous and non-indigenous heritage
- Water cycle management
- Subdivision
- Geotechnical and contamination
- Utilities

5.1 Urban design and future development guidelines

The proponent states that the built form envisaged under the concept plan has been driven by the need to increase housing density in an area with good access to services and transport whilst maintaining the suburban character of the surrounding locality.

The renewal project will reduce the concentration of social housing to 30% of all dwellings and will follow the traditional pattern of houses and front yards addressing the street, as opposed to the current 'Radburn' design of the estate.

The majority of the renewed estate will be one or two storeys in height so that the proposed development is consistent with the suburban character of the adjoining residential suburbs. It is expected that the predominant built form will be detached dwelling houses with some small lot housing forms and attached seniors living units. The renewal project requires a new street pattern and a new land use pattern. The need to retain some existing elements of the built form (some streets and buildings) results in some restrictions on the ability to locate streets and regular block patterns.

The proponent has provided sufficient examples of building typologies to demonstrate that an acceptable built outcome can be achieved when the new subdivision patterns are created. A range of housing types on lot sizes that are less than that allowable (below the minimum of 500 square metres) under the Campbelltown (Sustainable) City DCP 2009 (the DCP) are proposed to be accommodated.

Included in the proposal are uniform street tree planting on both sides of the street and a street fencing strategy. These elements are critical to give the project a consistent, cohesive finish.

Consequently, Claymore Urban Renewal Development Control Guidelines are proposed, which will form part of the concept plan approval. The key areas of difference in respect to the Development Control Guidelines and Council's existing Development Control Plan are outlined in the table below:

Table 3: Comparison – Development Control Guideline and Development Control Plan

Development control	Council DCP requirement	Claymore Development Control Guidelines	Council comment
Minimum site area	350 sqm for multi dwelling and 500 sqm for isolated subdivisions	Minimum 200 sqm, however average lots likely to be in the vicinity of 350 – 450 sqm.	The development proposes increased densities around the town centre and open space areas, with larger conventional allotments on the periphery of the estate. This is considered a reasonable response given the masterplan nature of the project.
Primary street setback	5.5 m	3 m for lots 200 – 300 sqm 4 m for lots greater than 300 sqm	These variances are considered acceptable given the masterplan nature of the site and that they reflect contemporary planning standards and are also consistent with the State Housing Code.
Rear boundary setback	5 m	3 m for properties less than 450 sqm and 4 m for properties greater than 450 sqm.	The design guidelines allow a reduced setback, which can be successfully managed on an individual merit basis, subject to identification of privacy, overshadowing and bulk/scale assessment.
Side boundary setback	0.9 m	0.9 m unless built to boundary for zero lot line on narrow lots less than 300 sqm	The design guidelines allow zero lot line construction for attached and integrated dwellings. This encourages a mix of housing and increased densities within and adjoining the town centre precinct and adjoining open space areas.
Garage dominance	50%	50% for lots 300 sqm or greater. Could be more than 50% if garage fronts rear lane	Consistent with council DCP
Garage setback	6 m	5.5 m to primary street and 1 m to rear lanes	5.5 m is considered acceptable in this instance and is consistent with Housing Code
Maximum building height	9.5m uppermost roof height	9.5 m uppermost roof height	Consistent with council DCP
Site coverage	No site coverage control however floor space ratio control of 0.55:1.	Dependant on lot sizes, ranges from 70% for 200 sqm allotments to 55% for 600 – 900 sqm allotments.	Whilst the Council and the Claymore Design Guidelines use different site coverage and density controls, the net result is that they will limit bulk and scale in order to achieve a reasonable level of residential amenity

Development control	Council DCP requirement	Claymore Development Control Guidelines	Council comment
Private open space	A minimum area of 75 sqm including a levelled area of 5 m x 5 m.	A minimum 16 sqm (including an area with minimum dimensions of 4x4) for lots sized 200 – 300 sqm and a minimum 24 sqm (including an area with minimum dimensions of 6x4) for properties above 300 sqm.	There is a considerable variance between the design guidelines and Council's DCP. However, when taken together, the site coverage restrictions, also contained in the design guidelines, plus the minimum private open space requirements, will ensure there is sufficient open space and landscaped area associated with each dwelling. The master planned nature of the renewal project, with much smaller allotments being proposed, calls for a different set of controls to the existing DCP, which is primarily targeted at infill development within existing developed residential neighbourhoods that have larger lots and varying dwelling-to-dwelling relationships.
Car parking	One under cover garage space per dwelling	One covered space per dwelling	The design guidelines require a covered space, which is consistent with the intent of Council's DCP.

The alternate standards proposed in the Design Guidelines for the Claymore estate are generally consistent with those included within the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 and are also consistent with the planning controls that have been successfully used for previous renewal projects in Campbelltown, such as the Minto Renewal area. The Minto renewal project has proven to be successful in delivering a high level of urban amenity that is not inconsistent with existing urban areas, yet establishes the unique urban character of the Minto renewal project.

In this regard, any subsequent Development Applications will be required to be designed having regard to the Claymore Urban Renewal Development Control Guidelines and Concept Plan approval and assessment of the proposed dwellings and general built form of each precinct will be considered at each DA stage. It is envisaged that Council could amend its Development Control Plan to incorporate the Claymore Design Guidelines once the concept plan is approved.

Given the nature of the renewal project and importance placed on improving the image and urban identity of the estate, it is recommended that the proponent provide estate entry statements. The entry statements shall be low scale landscaping features located at key locations, for example at the junction of Badgally Road and the proposed "Glenroy Road" Road and Dobell and Gould Roads. A concept plan modification has been recommended that the proponent provide details as part of the lodgement and determination of the Stage One development application.

5.2 Existing and Proposed Retail Centres

One of the significant features of the renewal project is a proposed new retail centre, located on Badgally Road at its intersection with a new access road to service the locality. In favour of this centre, the proponent offers the following planning reasons:

- the new site provides a recognisable entry point and location for the provision of local retail and professional services
- the site would have a more sustainable catchment by being able to service Blairmount and parts of Woodbine
- the greater catchment and high volumes of passing traffic would sustain a greater range of retail and professional services and therefore improve local employment opportunities and business facilities
- the site is integrated into the Claymore Concept Plan being surrounded by higher density residential development, new community facilities and a new town park
- independent retail analysis supports the proposed new site as a location for a town centre.

In opposition to this aspect of the renewal project, the owners of the existing Claymore Shopping Centre, which is located centrally within the suburb of Claymore, have made numerous submissions throughout the assessment process raising concerns based on the following issues:

- economic impact and commercial viability
- retail hierarchy
- urban design
- restriction on ability to make improvements to existing centre.

Each of these issues has been considered and are discussed below. It should also be noted that Council's assessment of the Concept Plan application has resulted in a resolution to seek to retain the existing shopping centre in its current location (refer Council Resolution Minute Number 218 from the meeting of 18 December 2012). This would require amendment to the Concept Plan.

Economic Impacts and Commercial Viability

The concept plan application was supported by a retail assessment report prepared by Hill PDA. It concluded that:

- Claymore could support a centre of 5,000 - 6,000 square metres including a supermarket
- the existing shopping centre location is inferior and the proposed new town centre location is appropriate
- the impacts of the operation of a new alternative town centre on the existing centre are likely to undermine its viability to the point it would cease to trade.

Due to the significance of this issue, Campbelltown City Council commissioned a review of the Hill PDA report. This review was undertaken by Leyshon Consulting and it reiterated the views put forward by Hill PDA.

The owner of the existing centre has made an argument about the economic impact on the existing Claymore Shopping Centre and its commercial viability and there are two strands to that argument. Firstly, the proposed new centre would undermine the commercial value of the existing centre and would reduce their ability to substantially expand and improve the existing centre. Secondly, the economic viability and value to the local community of the proposed new site is significantly overstated if a major supermarket cannot be secured.

It is true that the new centre would impact upon the existing centre. Simply put, in a competition between the two sites the new location would prevail (according to both the HillPDA and Leyshon reports). The economic impacts of the concept plan proposal are

important to consider, as is the best long term urban structure to help facilitate Claymore's renewal outcomes.

This renewal project has come about as a result of the need to address well documented shortcomings in the planning and urban form of Claymore. The current state of the shopping centre is a case in point. The proponent's preference to relocate the retail centre to Badgally Road is well founded and supported by the two reports (Hill PDA and Leyshon).

It is also important to consider that planning legislation has been drafted that denies consent authorities the ability to use economic competition as a reason to refuse a proposal that would, on all other grounds, have merit (see Draft State Environmental Planning Policy (Competition) 2010). It should also be noted that such planning controls remain in draft form and have not been formalised.

In this case, whilst the Council is aware that competition can not ordinarily be used as grounds for refusal of a development application, Council is concerned over the impact of a new retail centre on the viability of an entire existing retail centre (and not just individual businesses that lie therein) that the Concept Plan would threaten should the proposed new centre located at the corner of Badgally And Glenroy Roads was to proceed. Council is also concerned over the potential implications for the wider sub-regional retail centre hierarchy that may be brought about by the newly proposed centre.

Retail Hierarchy

The submission from the owner of the existing Claymore Shopping Centre questions the role of the proposed new centre in the retail hierarchy. Under the Campbelltown (Urban Area) Local Environmental Plan 2002, the existing centre is zoned 10(c) Local Comprehensive Centre, the same zone as proposed for the new centre. By comparison, Eagle Vale is zoned 10(b) District Comprehensive Centre. The submission makes the point that retention of the existing centre in its current location, at the heart of the existing suburb, would be consistent with its zoning.

Despite the zoning difference between the Claymore and Eagle Vale centres, both are classified as neighbourhood centres in the document *Campbelltown Business Centres Strategy* prepared for Campbelltown City Council in 2005. The significant differential in current trading performance of the two centres can be explained by a combination of factors including location, convenience, design, management and socio-demographics of the catchments.

The Claymore Renewal Project is aimed at addressing the current deficiencies of the area, which include a poorly sited retail centre. There are strong justifications, supported by both the original retail study by Hill PDA and the subsequent review by Leyshon Consulting, to re-establish a retail and community focus on a different site within Claymore, without disruption to the surrounding retail hierarchy that exists. The status of a retail centre is not only influenced by its location but also by the scale of development and in this regard the new retail centre site is modest in scale and consistent with a local centre. This would maintain the current retail hierarchy as far as centres with the Campbelltown LGA are concerned (other than leading to the demise of the existing Claymore retail centre).

There are however, other retail centres of influence located outside of the Campbelltown LGA boundaries and it may be of some benefit to commission further retail analysis that places the proposed concept plan and the new centre in a broader economic context.

Urban Design

The submission from the owners of the existing centre also questions the urban design merit of "decentralising" the retail centre and moving it away from other existing community uses such as the Claymore Public School, child care centre and open space. Concern is raised

that the new centre is sited to attract trade from a greater catchment to the detriment of the local primary catchment. However, the proposed location is adjacent to a proposed new town park, new community centre, proposed senior living developments and across the road from the existing Blairmount Public School. It is also appropriate to consider that a fundamental objective of this urban renewal project is to avoid Claymore being isolated or inward looking and being perceived as a place separate from other communities in Campbelltown. Allowing Claymore residents to look outside of Claymore and residents of other areas to look in and share facilities should be seen as a positive outcome of the Renewal Project.

The Renewal Project seeks to shift the socio economic status of the Claymore population from one of disadvantage to one more aligned with neighbouring suburbs. Greater mobility is likely to characterise the new Claymore population, therefore offsetting the need for the new town centre site to be geographically central in Claymore. The new road pattern and the public transport available would ensure the new centre remains a high level of accessibility.

Restriction on ability to make improvements to existing centre

The owners of the existing shopping centre claim that they intend to improve and expand their centre and that the concept plan would preclude these plans. Such plans may have been contemplated, however at this time no applications have been lodged with Council for determination. Under the concept plan, the site would eventually be rezoned for residential development and future redevelopment plans for retail/commercial uses would then be inconsistent with the concept plan and would therefore rely upon existing use rights. Such rights would come with restrictions upon the scale and scope of future expansion plans. Given the current state of the shopping centre, it is conceivable that the current owner does have legitimate plans to improve it in a significant way and to a scale which may not be possible if the renewal concept plan is approved and existing use rights are the sole mechanism for the assessment and determination of subsequent Development Applications. To some extent this leads to the conclusion that should the Concept Plan be approved without amendment, the longer term value of the site could potentially be established by future residential yield under the proposed Concept Plan (approximately 25 residential lots). Alternatively, the concept plan could be amended to indicate retention of a commercial/mixed use zoning over the existing centre. This is the position the Council favours.

It is noted that the retention of the existing shopping centre may also potentially compromise the Concept Plan to some degree, the objective of which is to provide the best opportunity for the urban renewal of an area that has proven to be unsustainable in both the built and social environment. A key component of the renewal strategy is to provide a site for an alternative retail opportunity so as to create a successful and vibrant retail and community hub.

This is noted as being important, as the existing site is in an inferior location by comparison to competing centres and regardless of the benefits of the renewal project and an injection of capital from its owners, there is a possibility that it may likely to continue to struggle within a competitive retail market place, as stated within the retail studies already available.

There would be a significant demographic shift resulting from the proposed renewal project with commensurate increased demand for improved quantity and quality of local retail services. A new site on Badgally Road would not only capture this spending capacity of the Claymore precinct, but also be better placed to attract trade from Blairmount, parts of Eagle Vale, Eschol Park, Blair Athol and Woodbine. It would provide the opportunity to establish a centre that not only serves local Claymore residents, but looks outward and embraces adjoining suburbs, helping to further elevate a positive impression of the renewed Claymore locality.

There is justification for the new Badgally Road centre from an urban renewal perspective. Just as the existing residential development is being turned over, so too would the retail centre. Opportunity for redevelopment of the existing centre could be maintained, with this

approach, either through zoning or existing use rights. However, it is likely that the existing centre would not survive.

The Concept Plan application (supported by retail studies) is based on a fundamental strategy that the existing site is no longer the preferred option for a retail centre.

The Council acknowledges that the establishment of a new retail centre as part of the concept plan has merit and makes a contribution to the overall renewal project. However, on the matter of the retail centre and on balance, the Council holds the view that the existing centre should be retained and the proposed new centre be discarded.

Accordingly, the Council recommends the amendment of the Concept Plan to retain the existing retail centre at Dobell Road in its current position and that no additional nor replacement centre be established at Badgally Road.

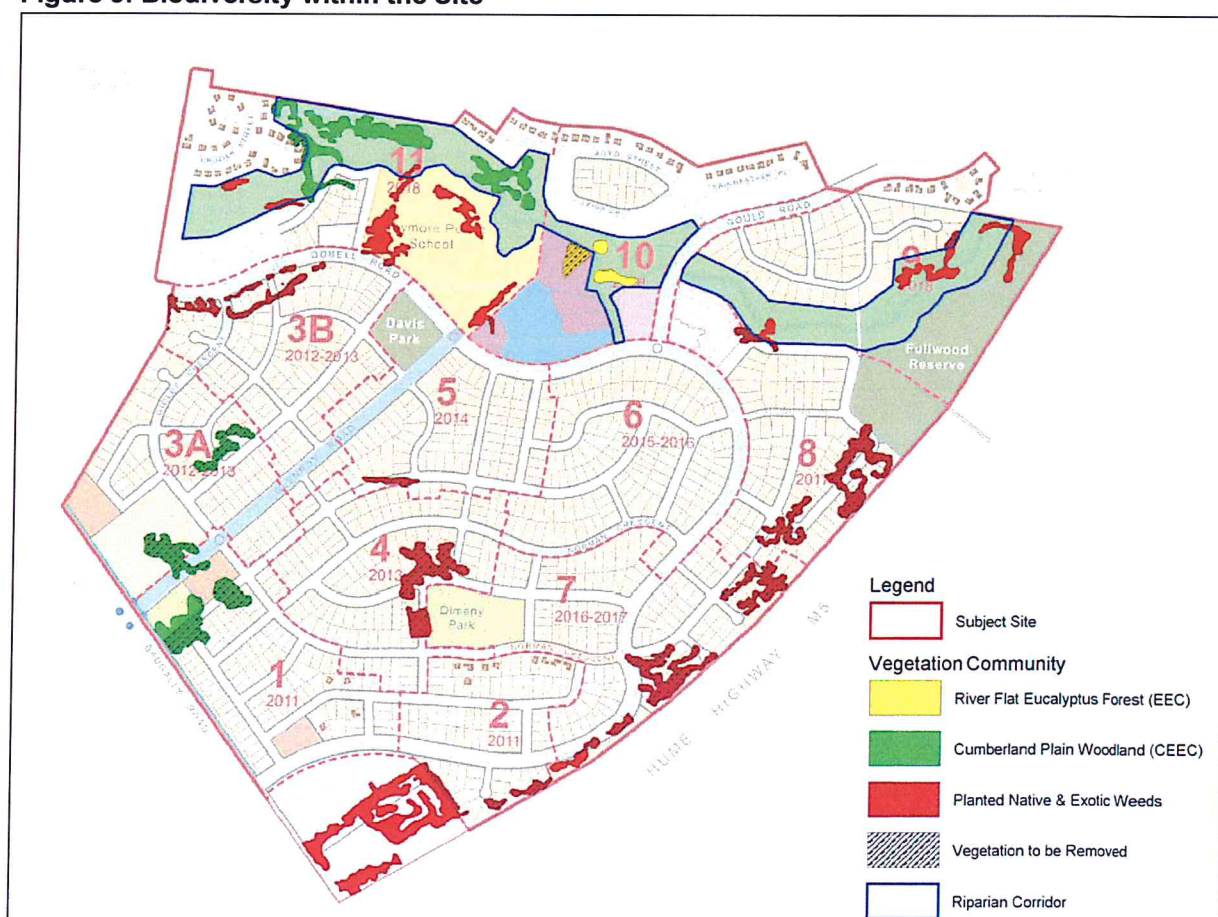
5.3 Biodiversity

Potential impacts on biodiversity have been considered and a comprehensive report was submitted in support of the application prepared by Cumberland Ecology. The report concluded that notwithstanding the high degree of modification of the landscape, there are the remains of two low quality examples of listed threatened vegetation types:

- River-flat Eucalypt Forest (Threatened Species Conservation Act)
- Cumberland Plain Woodland (TSC Act and Environment Protection and Biodiversity Conservation Act).

Figure 9 below, provides a map showing the key ecological communities present on the site.

Figure 9: Biodiversity within the Site



The vegetation that does occur forms scattered patches within reserves including Badgally Reserve, Dimeny Park, Fullwood Reserve and the riparian land and parkland west of Fullwood Reserve. A Vegetation Management Plan (VMP) is proposed to be implemented which will include major off-set plantings within the locality, seeking to integrate areas in order to create more sustainable vegetation communities. With this plan in place the biodiversity result will be positive.

Sites that are suitable for the required off-set plantings are being identified with Brady Park and Fullwood Park both having potential. The off-set strategy would ensure that the plantings are undertaken within the locality and not dislocated from it as originally proposed. This is a positive outcome.

Fauna habitats are quite limited within the subject site with trees lacking hollows and no major water bodies present. The fauna present is typical of suburban areas and dominated by hardy native birds such as magpies, ravens, rosellas and noisy miners. Ring tail and brush tail possums are likely, but also feral animals, such as foxes, feral cats and rats.

The Statement of Commitments included in the final Preferred Project report contained the following:

- *The proponent will prepare a Vegetation Management Plan in accordance with the guidelines in Appendix 3 of the Response to Submissions and Preferred Project report dated May 2012.*

The proposed VMP will cover the off-set planting areas and be based on the 'maintain, improve and protect' principles. As was done with the Airds Bradbury project, a modification to the Concept Plan can be imposed to ensure that no subsequent subdivision application can be approved until the final biodiversity off set package is in place. This can also be linked with the required VPA.

Council has resolved to retain the existing public open space that fronts Badgally Road. These areas, as depicted in Figure 9 above, are occupied in part by Cumberland Plain Woodland. Therefore, Council would seek the amendment of the Concept Plan to retain these areas as public open space and seek their embellishment as part of the Vegetation Management Plan.

5.4 Traffic, transport and accessibility

Current Road Network and Hierarchy

Currently, Badgally Road and Eagle Vale Road perform sub-arterial functions although neither of these roads actually traverse the subject site. Badgally Road forms the southern boundary of the site and there are proposed to be two access points to Claymore from Badgally Road; one at the existing intersection with Dobell Road and one at the newly created town centre intersection (to be known as Glenroy Road), which will be a signalised intersection.

Council has lobbied extensively with the NSW Government and various agencies for many years seeking a funding commitment to the upgrading of Badgally Road to cater for increased traffic flows from further residential development to the west (south West Growth Centre). To date no commitment has been forthcoming. The proposed renewal project will add to the volume of traffic utilising Badgally Road given the increase in residential yields proposed by the Concept Plan together with the likely change in household demographics, including a probable increase in car ownership.

Dobell Road and Gould Road currently perform a collector road function within the subject site. All other roads are performing as local roads.

Proposed traffic network

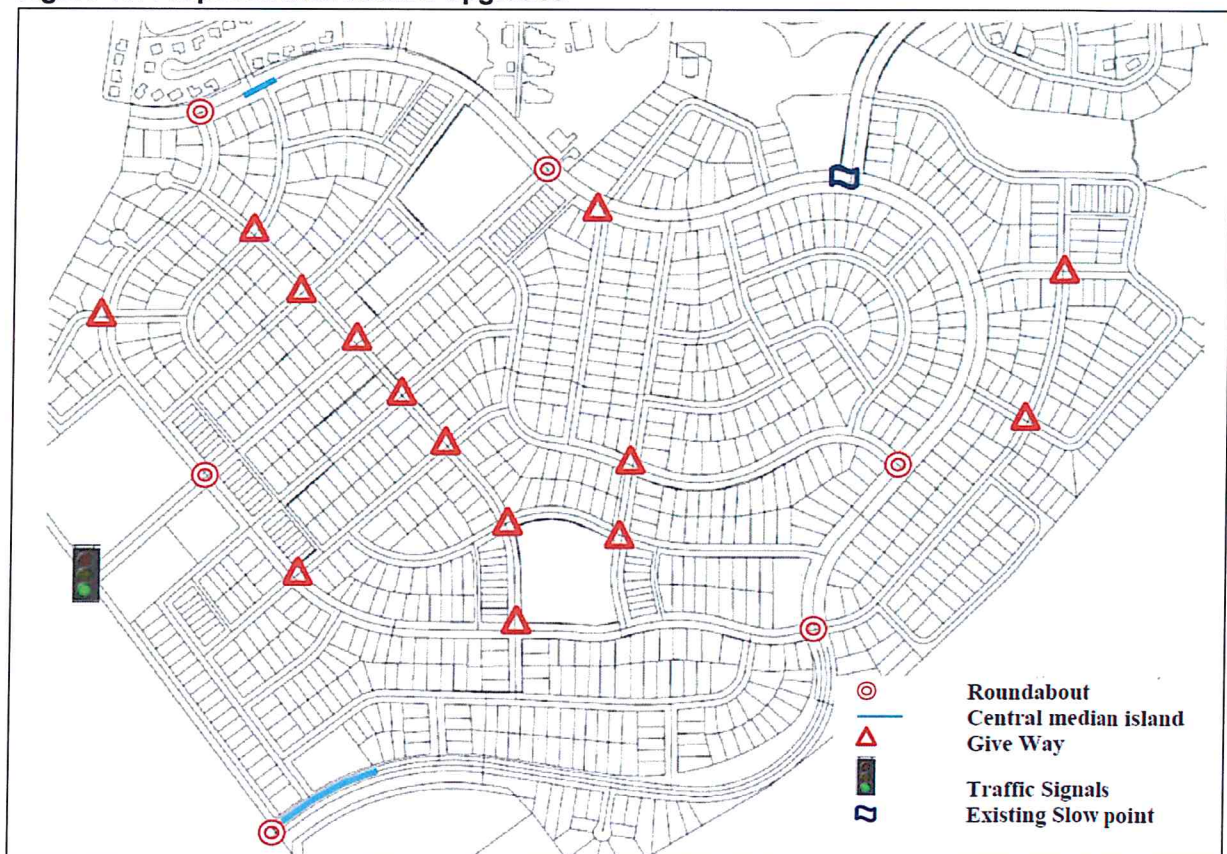
The concept plan provides an upgraded urban structure based on a more interconnected street system and improved access from the surrounding road network. This provides an improved sense of arrival and gateway presentations for the area while improving the integration of the estate with the surrounding area.

The key transport objectives are to:

- “de-Radburnise” the study area by improving linkages and overall connectivity within Claymore and to surrounding areas through improvements to Dobell Road, the main circular collector route through the study area, coupled with the introduction of two new collector roads providing more direct north/south and east/west alignments
- improve vehicular and public transport access within Claymore and to adjoining areas
- optimise the location of the town centre having regard to the existing and future road network and public transport networks
- remove existing unsafe pedestrian underpasses
- provide safe and direct cycleways and pedestrian linkages connecting local services, schools and open spaces in Claymore as well as to other neighbourhoods.

The Transport Accessibility Study prepared by Traffic Solutions, has considered the increased traffic associated with the development and finds that the concept plan is acceptable subject to a number of minor intersection upgrades (see Figure 10).

Figure 10: Proposed Intersection Upgrades



The main traffic works proposed to support the development include:

- signalisation of the intersection of Badgally Road and the proposed new collector road, to be known as Glenroy Road, at the proposed new town centre site
- roundabouts at intersections of Dobell Road and other collector roads.

The traffic report satisfactorily addresses the likely traffic impacts emanating from the proposed development. The intersection upgrades can occur in a staged manner as the project is progressively undertaken. The level of service provided at local intersections is satisfactory, with the suggested intersection upgrades maintaining or improving current levels of service.

The traffic report will require amendment however to take account of Council's recommendation to retain the existing shopping centre and discard the proposed new centre at Badgally and Glenroy Roads. That report will need to reconsider certain network enhancements.

The final design details of intersections will be resolved at the individual development application stage.

Pedestrian and cycle networks

The concept plan proposes a network of on and off road cycle paths to improve cycle access within the site and connections with surrounding areas and existing cycle paths. Footpaths will be provided along all roads (except laneways). Additional pedestrian refuges are proposed outside schools, major open spaces, senior living areas as well as the town centre to facilitate safe crossing opportunities for pedestrians.

Details of the location and arrangement of pedestrian and cycle networks proposed as part of the development are found in the EA.

The proposed pedestrian and cycle networks will complement the new urban structure, which promotes a better connected community. Whilst the cycleways are restricted to 2 m in some parts of the concept plan, generally the development achieves Council's requirements of 2.5 m shared pathways.

The existing pedestrian underpass at Dobell Road at the existing shopping centre should be demolished as it presently creates an unsafe environment for residents.

Council's decision to require the amendment of the concept plan to account for the retention of the existing shopping centre and removal of the proposed new centre at Badgally and Glenroy Roads will be likely to necessitate the review of the traffic report and the proposed pedestrian and cycle network.

Public transport

Public transport is currently available to Claymore via a dedicated bus service that provides linkages to both Campbelltown and Minto.

The renewal project, with its emphasis on improving street hierarchy and connectivity, will force a change to the existing bus route.

The existing bus route (see Figure 11), utilizing Dobell Road would provide for all dwellings to be within 400 m from the route, however it would not service the proposed new retail and community centre on Badgally Road.

Busways, supported by Transport for NSW (TfNSW) have suggested an alternative route that will service the new retail/community centre but only provide 400 m coverage to 95 per cent of dwellings within the project as well as bypassing one of the designated senior living sites. This route would require the upgrading of a proposed local street to collector standard and potentially affect the subdivision layout (proposed by the Concept Plan) in four stages of the development. This route is approximately 90 m shorter than the existing route and by excluding the north eastern end of Dobell Road, is a more direct route.

The PPR sets out the proponent's proposed route. It is approximately 500 m longer than the Busways option, however it would service proposed new retail/community centre at Badgally and Glenroy Roads, all of the seniors living sites and 100 per cent of dwellings would be within 400 m of the route. Landcom believe that any additional cost incurred by Busways from the longer travel distance would be off-set by the increased patronage this route would generate.

This issue has been considered and commented upon by TfNSW, who make the following points:

- *To be effective a bus route must at least be perceived as being direct if not actually being direct. A disincentive for through passengers is that the route will be seen to be circuitous.*
- *Our guidelines do not aim for total coverage of 400 metres, but 90%. This avoids introducing bus routes that cover the area, but which no one uses because they are too slow. The proposed Busways route betters the 90% goal, which is in fact for the region as a whole, and not individual parts.*
- *It takes about 3 minutes per km when operating bus routes. A 500 metre longer route will add around 4 minutes to a return trip which has impacts on schedules and the maximum number of trips that a driver can operate in a shift. It also tends to impact on train connections especially on a route such as the 880 which has connections at Minto and Campbelltown.*
- *Wherever possible TfNSW seeks to avoid operating a bus route around the edges of a suburb where buses only have a catchment along one side of the route. Instead we operate buses through the centre of the suburb to minimise bus travel times.*
- *We understand that Busways only operate the current route because there is no other way through the suburb. In this regard making the route faster is considered a positive outcome of the redevelopment and not a negative outcome.*

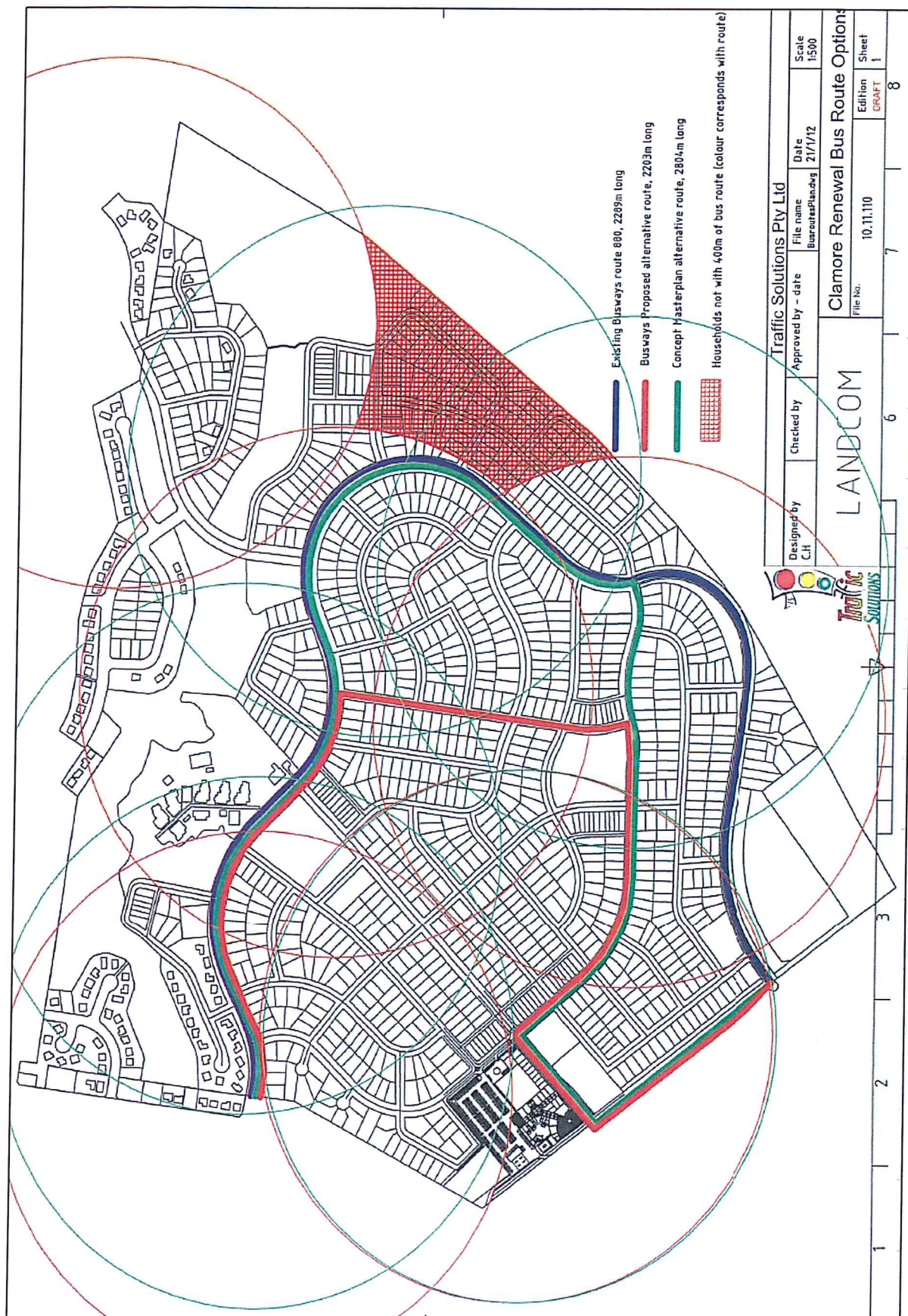
Both the proponent and Busways preferences have benefits and both would provide a high level of service. The distinguishing factor comes down to the proponent's 100 per cent coverage against Busways' shorter route.

Although TfNSW have provided some reasonable arguments in favour of the Busways route, an important aim of the renewal project should be maximum accessibility for the maximum number of residents. On this basis, the proponent's route is preferred. On the other hand, the transport experts (TfNSW) agree with the transport provider (Busways), that 95 per cent coverage coupled with a more direct and efficient route provides an overall superior public transport package.

Ideally the PPR would set out a route that is supported by all parties. Despite a review by all parties, a difference of opinion remains on this issue and as such, a recommendation must be made having consideration to the position from all parties.

It is important that the bus route analysis and consultation be reviewed in light of the Council's recommendation to amend the Concept Plan to take account of the retention of the existing shopping centre located on Dobell Road.

Given the focus of discussion between all the parties regarding the preferred bus route (as discussed above) has included an assumption that the proposed new retail centre would be approved, a review of the route based on Council's recommendation to discard the new proposed centre would be warranted.

Figure 11: Bus Route Options

5.5 Social infrastructure and services

The provision of community services and the social impacts of the development have been the subject of an Integrated Social Sustainability and Health Impact Assessment and Plan. In relation to social impacts, the Statement of Commitments includes the preparation of a Strategic Social Plan to coordinate future service planning and delivery, implementation of a rehousing process for those residents who will be dislocated and implementation of a communications strategy to keep people informed throughout the lengthy development process.

The renewal project provides the opportunity to rationalise and improve the community facilities that currently exist, many of which are targeted at the existing disadvantaged population. As a result of the renewal project there will be a reduced demand on existing local services and it is expected that there will be more use of LGA and regional level services. As part of the project, a new multi-purpose community centre and child care centre will be developed within the new town centre precinct.

Key findings of the Social and Health Impact report were:

- Population make-up will change substantially, moving away from the very high levels of the vulnerable and disadvantaged. Currently incomes are very low, there is a high proportion of single parent families, employment is low, health issues and disabilities are high, as is reliance on intensive service support. Following the renewal project the characteristics of the population will more closely resemble those of surrounding areas.
- The two main cultural groups within Claymore, Aboriginal people and those from a Pacific Island background, will need assistance through the proposed rehousing process in order to maintain social and cultural links.
- The distribution of social housing tenants throughout the renewal project is important, as is the fact that architecturally, these homes will be indistinguishable from the privately owned homes. Seniors living units will be provided in clusters adding further to the mix between private and public housing.
- A sign of success of the renewal project will be the reduced need for services in Claymore, in particular intensive health and welfare services. It is intended that the needs of the new community will be met through the neighbourhood centre and district level services. The required Strategic Social Plan will monitor and manage the transition from existing to new services.
- Maintaining communication with the residents is critical. A Regeneration Team based in Claymore continues to carry out consultation in regard to the renewal project and in particular the rehousing process to ensure that the preferences of individuals or families can be considered. Some residents will wish to stay in Claymore while others may choose to live elsewhere taking into account social links, service needs and employment.

The provision of new and upgraded community facilities is considered a necessary component of the rejuvenation of the Claymore estate. The delivery, design and scope of a new community services building have been included within a draft VPA, which would be formalised once the concept plan has been determined.

Furthermore, the Strategic Social Plan to be developed in collaboration with local residents, non-government organisations and government agencies will effectively deal with the transitional issues that will invariably arise as the concentration of public housing tenants decrease and new private residents increase. It is important that during this transitional period that existing services for public housing tenants are still provided and their specialised needs are adequately addressed.

Resident submissions raised significant concern regarding the proposed removal of the Baptist Church and Guardian Angel Pre-school (operated by the Baptist Church). Both

facilities are located on the corner of Dobell and Gould Roads, and located on land owned by Housing NSW, which the Baptist Church leases. The consideration of the provision of community services and facilities is contained within the integrated social sustainability report prepared by Elton consulting and this report recommends that a multi-purpose community centre and child care centre be provided as part of the redevelopment of Claymore and be constructed and dedicated to Council. The report recognises that a second child care centre may be required once full development occurs within Claymore, and that this child care centre will be provided by the market, whether a non-profit or for-profit organisation.

The issue as to whether Housing NSW re-new or retain the Baptist Church leases is on the one hand a contractual matter between the land owner and the lessee, while on the other hand it is a significant social issue, as evident by the concerns raised within the public submissions. While the concept plan would not restrict either a child care centre or a church continuing to operate, or in fact restrict a new facility being built somewhere else in Claymore, it would not be unreasonable for Council to seek to have a greater level of surety that these two community uses will be retained. Although the PPR mentions that negotiations are being held with the Baptist Church with a view to the uses being retained, the Statement of Commitments is silent on this issue. An appropriate concept plan modification is recommended to be imposed to ensure the continued presence of the existing community uses.

5.6 Provision and embellishment of open space

The existing public open space areas within Claymore do not provide a high level of utility. There is a lack of appropriate public surveillance and an indeterminate sense of ownership of the spaces. Therefore they suffer from anti-social behaviour, including being littered and unsafe. Although there are a large number of parks covering a substantial area, they are not well connected to other areas of activity such as schools and shops and there is no sense of the open spaces having a defined role or function.

The Concept Plan seeks to improve the open space within Claymore by:

- providing more focused areas with a defined role and function
- relocation of some open space to encourage best use of land, particularly around the town centre
- improving casual surveillance to improve safety
- improve accessibility to destinations such as schools and shops
- link the open space to the broader open space network.

Figure 12 below, details the proposed open space distribution through the urban renewal precinct.

The quality of embellishment of the open spaces will be locked in through the execution of a VPA between the proponent and Council. Davis Park, Dimeny Park and Fullwood Park are proposed to receive substantial improvements, reflecting their role as either passive/informal recreation areas or formalized sporting fields. The new town park adjacent to the new commercial/community precinct proposed by the Concept Plan is intended to be a key entry statement and focal point for the area. Brady Linear Park will be enhanced by defining the open space all the way across the northern part of the site, emphasising the shared pedestrian/cycle path and supporting new plantings of threatened ecological communities. The VPA would also provide some certainty in the timing of delivery of these improved open spaces.

The design of all open space will include Crime Prevention through Environmental Design (CPTED) principles to ensure they not only look attractive but are safe. This will ensure they become places that people feel comfortable visiting and over time become focal points for the community. The proposed designs of these areas facilitate good surveillance, access and territorial reinforcement by providing:

- providing a clear distinction between public and private domains with parks surrounded by streets in most cases
- opportunities for passive surveillance from adjoining streets and from clearly delineated pedestrian/cycle paths
- appropriate plantings that afford good visibility and do not create hiding or entrapment places
- clearly delineated access points including from the surrounding road network
- lighting at night
- a lack of fencing and obstructions to movement along the defined corridors
- boundaries to parks
- co-location of some facilities to ensure more active spaces
- landscaping and park furniture that clearly delineates the open space function.

Figure 12: Proposed Open Space Distribution



A number of members of the community raised concerns about the loss of open space fronting Badgally Road with the removal of the majority of the existing Badgally Reserve and Claymore Park.

These open space areas currently form a contiguous open space corridor onto Badgally Road, providing an almost rural setting. This open space is proposed under the Concept Plan to be replaced by predominately built form, being both residential and commercial.

Campbelltown City Council's consideration of the Concept Plan application resulted in a resolution that supports the retention of open space fronting Badgally Road (refer Council

Resolution Minute Number 218 from the meeting of 18 December 2012). Although not explicitly set out in the Council Resolution, arguments in favour of retaining the open space fronting Badgally Road are understood to relate to a preference for the retention and enhancement of this area of open space as a biodiversity corridor (where existing Cumberland plain vegetation could be retained and enhanced).

Notwithstanding the benefits associated with Council's intentions for this area of public open space, rather than defining or identifying Claymore, it has the effect of screening the neighbourhood from Badgally Road.

The open space currently serves no particular function, with generally lesser quality vegetation, poor access, poor surveillance and poor boundary delineation. In short, while it is "green space", it fails to deliver on the open space objectives as set out above. However, if that open space was to be embellished into a biodiversity corridor, the opportunity should be taken to review how the corridor could be better integrated with the revised concept plan layout (taking account of the retention of the existing shopping centre and the retention of open space along Badgally Road).

In summary, the concept plan would result in the removal of a series of poorly performing open space areas and their replacement with a redistributed network of connected and well-designed spaces with function and facilities that are more accessible and usable to the community. This results in a more efficient and safer use of land, more useable parks and a reduction in the on-going maintenance costs for Council. The level of embellishment, design and timing of delivery of public open space areas would ultimately be determined by the final VPA.

Notwithstanding, the proposed open space network contemplated by the Concept Plan, is in need of modification to take account of the Council's resolution to retain areas of public open space that have frontage to Badgally Road and to seek their embellishment as a potential biodiversity corridor. This will, by necessity, require the revision of the Concept Plan proposed neighbourhood layout which will also need to be mindful of the Council's assessment that the existing shopping centre be retained in favour of the removal of the proposed new retail centre that was to be located at Badgally and Glenroy Roads.

5.7 Indigenous and non-indigenous heritage

Indigenous heritage

An assessment of Aboriginal heritage has been undertaken with the proposed development assessed as likely to have only a minor detrimental impact to the aboriginal cultural landscape values of the area. Only one artefact site was identified and it is recommended that there could be relocation of artefacts to Dimeny Park, potentially to be complementary to carved stones that are currently within this Park. An Aboriginal Cultural Heritage Management Plan should be developed to guide matters through the project, including further archaeological investigations.

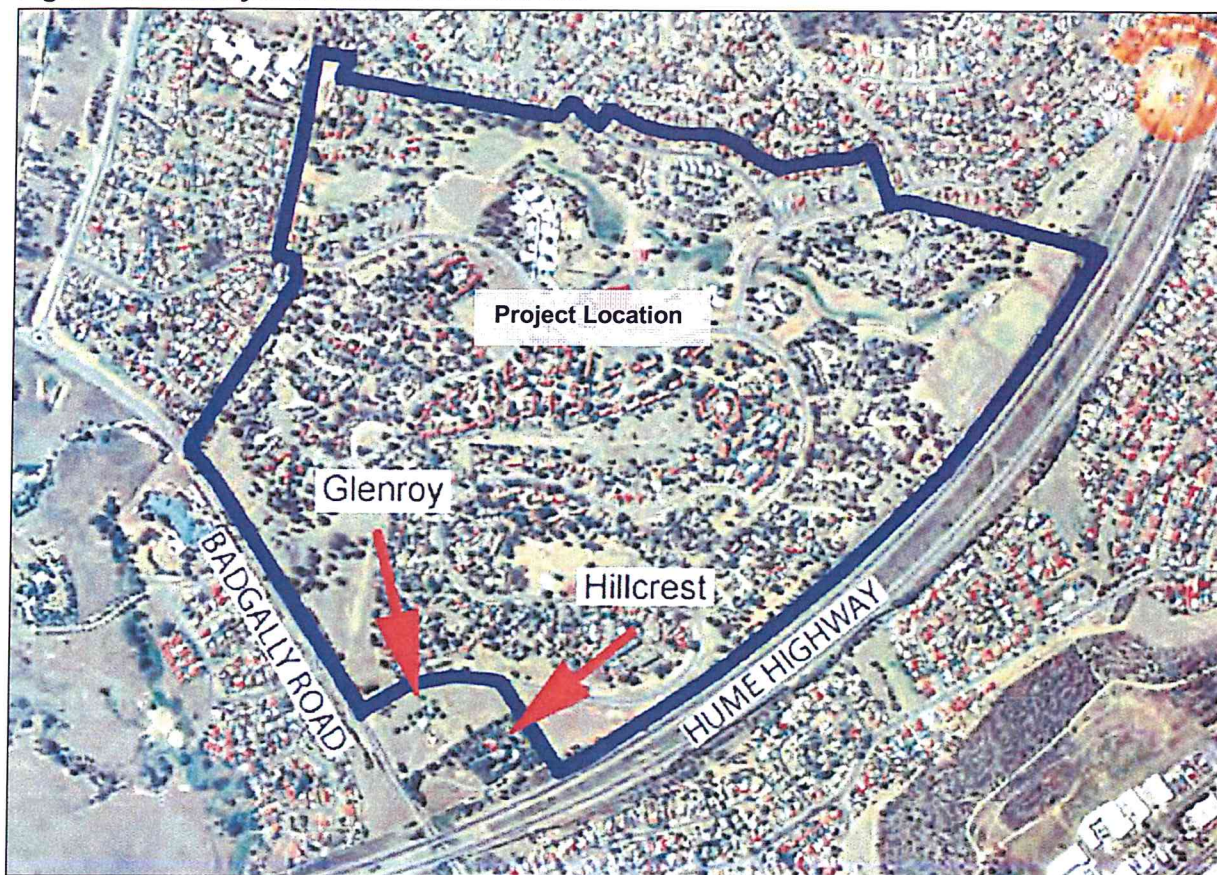
The Statement of Commitments within the PPR refers to the implementation of the recommendations of the Aboriginal Cultural Heritage Assessment which will ensure the appropriate follow up management is undertaken.

Non-indigenous heritage

In relation to European heritage, the site does not contain any listed items of local heritage significance. *Glenroy* and *Hillcrest* homesteads (see Figure 13) are locally listed heritage items that immediately adjoin the site. Additional assessment work was undertaken to ensure that proposed subdivision in the vicinity of these homes, in particular *Glenroy*, would not encroach upon the reasonable curtilage of the homes and that view corridors to and from the homes were not impeded.

The PPR indicates that the original concept plan has been amended to retain Lot 2 DP703539 (the *Glenroy* property), in its current form, excluding it from any development. This is considered to be an appropriate outcome. Recommended concept plan modifications have been included to reinforce this.

Figure 13: Glenroy and Hillcrest Homesteads



5.8 Water cycle management

The development is located within an established urban area and a Water Cycle Management Plan has been prepared. This plan covers management of both the quantity and quality of stormwater.

The water cycle management strategy comprises a range of elements that work together to deliver an integrated outcome addressing each of the following:

- stormwater quality improvement
- flooding and detention
- potable water substitution
- environmental restoration/rehabilitation.

In relation to stormwater quantity there will be a combination of minor/major stormwater infrastructure. The minor piped system is designed to manage general flows and convey nuisance flooding up to 5 year ARI. The major system incorporates overland flow routes through proposed roads and has been assessed against the 100 year ARI design storm event. An additional 'offline' detention basin and associated controls is proposed at Fullwood Park in order to decrease peak flows from the development.

In relation to stormwater quality it is proposed to provide:

- rainwater tanks for dwellings for at source treatment and re-use of roof water
- gross pollutant traps and trash racks to capture larger pollutants and sediments before discharge into the watercourse

- native grass infiltration swales to provide on line treatment for effective removal of fine sediments and nutrients.

It is expected that the quality of stormwater discharged from the site will be improved post development.

Further detailed assessment and design of water cycle management measures would be addressed as part of each stage of the subsequent subdivisions. This assessment will require drainage corridors for the development to be designed to convey flows for the 100 year ARI storm event. Recommended concept plan modifications have been included to ensure appropriate outcomes.

5.9 Subdivision

The concept plan does not seek specific approvals for subdivision. All necessary subdivision approvals will be obtained later through the lodgement of detailed individual development applications, generally in accordance with the proposed Staging Plan. Nonetheless, the proponent has provided an indicative subdivision pattern for the site, with lots generally to be in the order of 300 sqm to 500 sqm, with greater densities expected to be achieved within and surrounding the town centre precinct, with lots as small as 200 sqm. The indicative subdivision pattern is illustrated in Figure 14.

The indicative subdivision pattern would require amendment to take account of the Council's recommendation to discard the proposed new retail precinct at Badgally and Glenroy Roads and retain the existing shopping centre at Dobell Road.

Figure 14: Indicative Subdivision Pattern



Development applications for the future subdivision of land will also be informed by the provisions contained within the Development Control Guidelines that are proposed to form part of the concept plan approval. Recommended concept plan modifications have been included.

5.10 Geotechnical and contamination

The Environmental Assessment submitted to support the project contains a preliminary contamination assessment to ascertain whether the site is likely to present a risk of harm to human health and/or the environment. The conclusions of this report were that the site is suitable for the proposed residential development subject to detailed sampling in the vicinity of certain identified locations, development of a Remedial Action Plan, additional inspections following demolition of existing structures and an Unexpected Finds Protocol to be in place throughout the project. This is a standard approach to developments of this type.

The geotechnical assessment is considered to be appropriate subject to compliance with the proponent's Statement of Commitments, which includes the above safeguards.

A recommended concept plan modification has been included to ensure suitable consideration of geotechnical and contamination issues occurs as part of each stage of the subdivision.

5.11 Utilities

The PPR contains an updated Infrastructure Report by Mott MacDonald Hughes Truman (dated June 2011) on behalf of the proponent. The conclusion is that all utility services are available or can be readily extended to meet the requirements of the development.

Details of infrastructure servicing for each subsequent stage will be assessed and finalised through each subdivision application.

6. CONCLUSION

The Claymore Urban Renewal Project will result in a greater social mix within the suburb with 70 per cent of the housing stock to be privately owned and 30 per cent being retained as public housing. The original development of Claymore, based on the Radburn town planning principles, has proven to be unsuccessful and has left a poor planning legacy. The fact that the suburb was almost exclusively public housing resulted in an undesirable concentration of socio-economic disadvantage, which has proven to be unsustainable.

Campbelltown City Council has considered the proposal and through a formal resolution from the Council meeting of 18 December 2012, has indicated general support for the concept plan subject to the retention of the existing shopping centre in its current location and the retention of open space fronting Badgally Road. These issues are considered in this report and accordingly, Council makes the recommendation that the concept plan should be approved by the Minister subject to a revision to take into account of the:

- Retention of the existing shopping centre at its existing location
- Removal of the proposed new retail centre at Badgally and Glenroy Roads
- Retention of the existing open space fronting Badgally Road and its enhancement for the purposes of a biodiversity corridor.


Given the age and condition of the public housing stock and the depressed state of the existing town centre, Claymore is in critical need of redevelopment and it is important that the Claymore Renewal Project be supported. This report therefore recommends that the Deputy Director-General support the Claymore Urban Renewal project and grant consent to the Concept Plan subject to the abovementioned modifications being made.

7. RECOMMENDATION

It is recommended that the Deputy Director-General:

- a) **Consider** the findings and recommendations of this report;
- b) **Approve** the Concept Plan Application (MP11_0010), subject to modifications, under Section 75O(1) of the EP&A Act, having considered all relevant matters in accordance with (a) above;
- c) **Determine** that approval to carry out the project, except demolition works as described in Schedule 5 of the instrument at Appendix F, is to be subject to Part 4 of the EP&A Act under Section 75P(1)(b);
- d) **Specify** that under Section 75P(2)(c) the future environmental assessment requirements for the project, except demolition works as described in Schedule 5 of the instrument at Appendix F, under Part 4 of the EP&A Act are as identified in Schedule 4 of the instrument at Appendix F; and
- e) **Sign** the attached Instrument of Approval (Appendix F).

This report was prepared by Campbelltown City Council in accordance with the Instrument of Delegation issued by the Director-General dated 22 August 2011



Jeff Lawrence
Director Planning and Environment
Campbelltown City Council

APPENDIX A ENVIRONMENTAL ASSESSMENT

See attached disc or the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=4311

APPENDIX B SUBMISSIONS

See attached disc or the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=4311

APPENDIX C PROPONENT'S RESPONSE TO SUBMISSIONS

See attached disc or the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=4311

APPENDIX D CONSIDERATION OF ENVIRONMENTAL PLANNING INSTRUMENTS IDENTIFIED BY THE ISSUED DG'S REQUIREMENTS

State Environmental Planning Policy (Major Development) 2005

State Environmental Planning Policy (Major Development) 2005 (MD SEPP) outlines the types of development declared a major project for the purposes of Part 3A of the EP&A Act. For the purposes of the SEPP certain forms of development may be considered a major project if the Minister (or his delegate) forms the opinion that the development meets criteria within the SEPP.

The Minister declared that the proposal was a major project under Part 3A of the EP&A Act because it is development for the purpose of residential commercial or retail development with a construction investment value of more than \$100m, pursuant to Clause 13, Schedule 1 of the Major Development SEPP. The Minister also authorised the submission of a concept plan.

State Environmental Planning Policy No. 55 – Remediation of Land

SEPP 55 promotes the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. The policy states that land must not be developed if it is unsuitable for a proposed use because it is contaminated.

The environmental assessment contains a preliminary investigation on soil contamination on the site. The report found limited traces of contamination within the site area and where present the affected areas are able to be effectively remediated as part of the construction process. Further detailed assessment of contamination will be undertaken at the development application stage for subdivision works, with any remediation works to be supervised and tested by an appropriately qualified site auditor.

State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2004 sets out requirements for referrals for 'traffic generating development, and for development adjacent to the south west rail link corridor. The SEPP also sets out requirements for noise impacts adjacent to busy roads and rail corridors. State Environmental Planning Policy (Infrastructure) 2007 ("SEPP Infrastructure") provides for the effective delivery of infrastructure across the State in many cases including special provisions for development by or on behalf of public authorities. Such infrastructure types include educational establishments, Housing (including specific provisions for public housing), road infrastructure, and stormwater management systems.

The proposal is considered to be 'traffic generating development' for the purposes of the SEPP and as such the proposal was referred to the RTA. The proposal was also referred to Transport NSW. Both the RTA and Transport NSW raised no objection to the development, subject to certain matters, such as bus and pedestrian networks being adequately providing which is further details in section 5 of this report and Appendix E – Response to State Agency Submissions.

Greater Metropolitan Regional Environmental Plan No 2—Georges River Catchment

The REP applies to the Georges River Catchment and sets out planning principles to be considered in consideration of rezoning and development applications. Relevant principles relate to acid sulphate soils, bank disturbances, flooding, urban stormwater, vegetated buffer areas, water quality.

The proposal includes appropriate water sensitive urban design infrastructure, management of flood hazard, and protection of riparian corridors which will ensure consistency with the principles of the REP.

State Environmental Planning Policy (Affordable Rental Housing) 2009

State Environmental Planning Policy (Affordable Rental Housing) 2009 promotes the development of new affordable rental housing in New South Wales by providing development and design controls that assist with the delivery of housing stock for low and low-middle income earners and homeless and other disadvantaged people who may require support services, including group homes and public housing provision.

The Concept Plan is consistent with the provisions of this policy with elements of the development permissible with or without consent under this policy. Such development that may be carried out without consent by Land and Housing Corporation prescribed by clause 40 of the SEPP include the construction of up to 20 dwellings 8.5m high on one allotment and the demolition of existing dwellings.

State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

The Seniors Living SEPP aims to encourage housing that will increase the supply and diversity of dwellings that meet the needs of seniors or people with a disability. This can be achieved through both the appropriate location of developments and the appropriate design of dwellings within these developments.

The Concept Plan provides opportunities for seniors living developments in appropriate locations. There is nothing in the Concept Plan that would act to restrict the operation of the Seniors Living SEPP.

Water Management Act 2000

Ground water and riparian lands are managed by the Office of Water through the Water Management Act 2000. The object of the Act is sustainable and integrated management of the State's water resources.

The Claymore renewal Project is not inconsistent with the objects of the Water Management Act. Ground water will not be compromised, stormwater management will be improved and opportunities for water re-use will be enhanced.

APPENDIX E RECOMMENDED MODIFICATIONS OF APPROVAL

Part B – Modifications to the Concept Plan

Urban design and built form

Retail centre

1.1 The proponent is to remove the proposed shopping centre at the corner of Badgally and Glenroy Roads from the concept plan and retain the existing centre at Dobell Road

Open Space

1.2 The proponent is to amend the concept plan to show the retention of open space fronting Badgally Road

Fencing Strategy

1.3 The proponent is to submit a Fencing Strategy for the project site that must be considered and approved by Campbelltown City Council prior to the determination of the Stage One Development Application.

Entry Statements

1.4 Landscape entry statements are to be provided at the key entry points to the estate from Badgally Road. Details of the proposed treatments and works are to be provided and approved by Council prior to the determination of the Stage One Development Application.

Traffic and Transport

1.5 All roads that form part of the final bus route shall be of at least minor collector road standard

1.6 No development shall be permitted to have direct vehicular access onto Badgally Road

Heritage

1.7 The entire *Glenroy* property, being Lot 2 DP703539, shall be excluded from any development proposed by the concept plan

Special uses

1.8 In recognition of the strong community desire for the continuation of the Baptist Church and the Guardian Angels Child Care Centre, the concept plan is to either show these uses continuing at their current locations or identify suitable alternative sites within the Claymore renewal project site for their continued operation