

21 August 2015

Director Urban Renewal
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr File,

RE: GLENFIELD TO MACARTHUR URBAN RENEWAL CORRIDOR STRATEGY

MacroPlan Dimasi has been engaged by the owners of 1 Bugden Place, 1 Tindall Street and 4 Tindall Street, Campbelltown, to provide a submission to the NSW Department of Planning & Environment (DPE) in relation to the abovementioned draft strategy.

Site Identification

The subject site is formally recognised as Lot 1 in DP 882496, Lot 1 in DP 747811 & Lot 2340 in DP 830786. The owners of the properties are Dumarchand Holdings Pty Limited, Dankur Pty Limited, The Property Factory, and Sen Khun Two Pty Limited. The following is an aerial view of the subject locality, with the subject site outlined in red.



Source: Google Earth

Brief Site and Locality Description

The subject site's combined area is approximately 6 hectares. In terms of gradient, the site is generally flat. Existing land uses on the subject site include a Bunnings Warehouse, gymnasium, several restaurants and take away outlets, as well as a super market. The existing built form is characterised by typical large format commercial buildings equivalent to between 1 – 3 storeys. The building envelopes are surrounded by at grade parking as well as some landscaping.

The site is located within the Macarthur – Campbelltown Centre. The centre is typical of most major Sydney suburban centres. It includes a comprehensive range of commercial, retail, light industrial and residential land uses. It also includes a comprehensive range of public facilities including heavy rail public transport, hospitals and open space. Overall, it is a well-served centre with a high degree of accessibility, services and amenity.

A Plan For Growing Sydney

Metropolitan Sydney's latest strategic land use plan, 'A Plan For Growing Sydney', was released in December 2014. The plan 'upgraded' Campbelltown-Macarthur from a Strategic Centre to a Regional City Centre, making it identical to the Liverpool and Penrith CBDs. An extract of the plan is provided below.



Source: A Plan For Growing Sydney (page 12)

Existing Statutory Controls

Pursuant to the existing Campbelltown (Urban Area) Local Environmental Plan 2002 (CLEP 2002), the subject site is within zone 10(a) Regional Comprehensive Centre. This is essentially a 'mixed use' zone which permits a range of residential, commercial and retail land uses. The Campbelltown Development Control Plan 2012 (CDCP 2012) prescribes a maximum building height of 10 storeys for the subject site.

Draft Campbelltown Local Environmental Plan 2014 (Draft CLEP 2014)

Campbelltown City Council has prepared and adopted the Draft CLEP 2014. We understand the draft instrument has been forwarded to, and is under consideration by the DPE. The Draft CLEP 2014 prescribes a B4 – Mixed Use zone for the subject site as well as a 32 metre maximum building height. The draft instrument does not prescribe any floor space ratio (FSR) controls for the subject site, nor for most of the Campbelltown Local Government Area (LGA). We understand the application of any FSR controls was delayed pending the results of the Glenfield – Macarthur Urban Renewal Strategy.

Response to Draft Strategy Outcomes

Overall, we support the strategy's aim to renew and increase density along the corridor. This would maximise the corridor's efficiency, particularly in light of the existing public rail transport. The strategy would also increase opportunities for affordable housing as well as renew existing building stock which is arguably outdated.

We also provide that the strategy is essential to maintain the economic vibrancy in each of the stated centres, particularly the Macarthur – Campbelltown Centre. This is because the development of the South West Growth Centre, and in particular the Leppington Major Centre and Oran Park Centre are likely to draw competitive advantage away from those existing centres within the Glenfield – Macarthur Corridor.

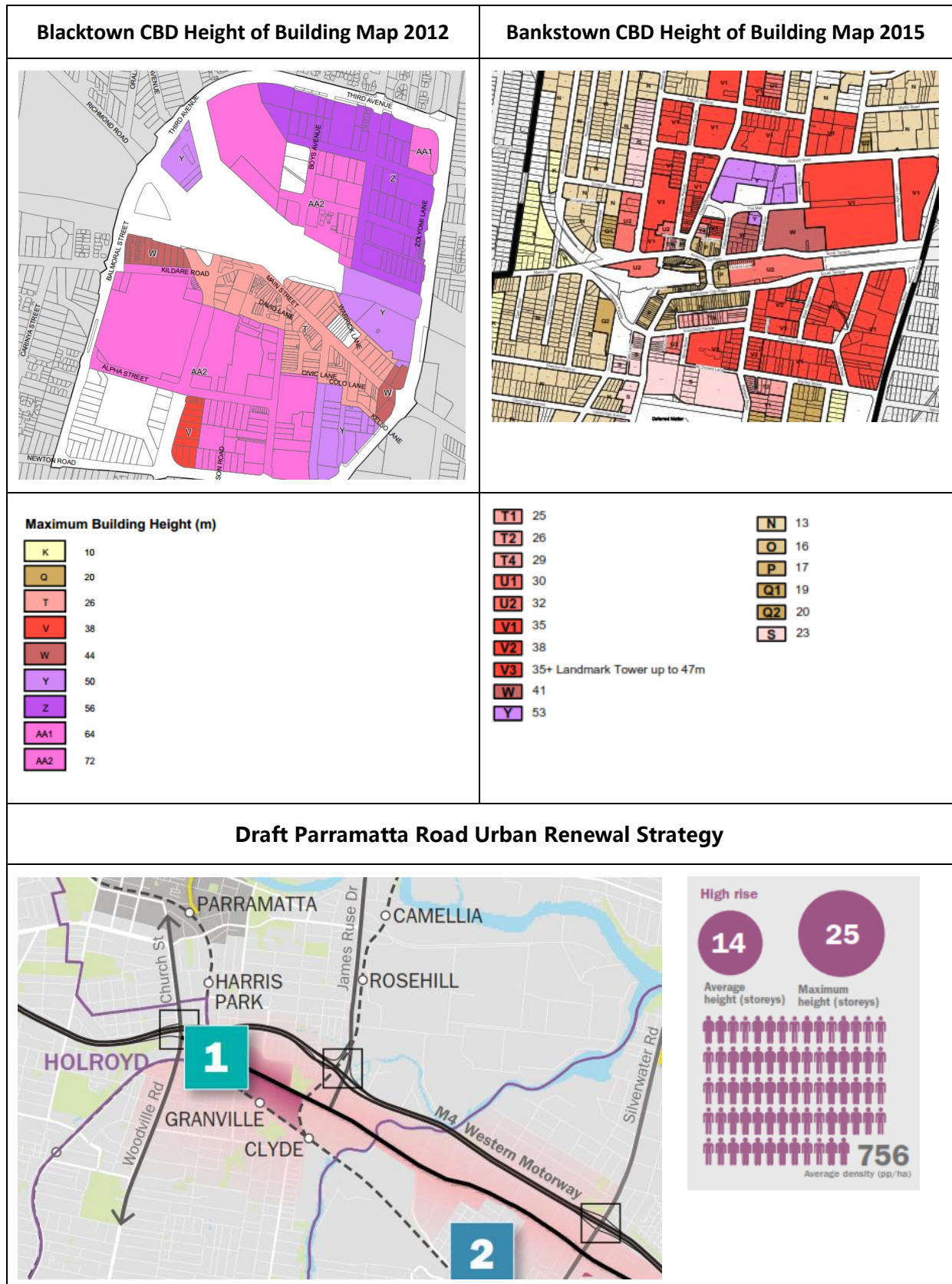
In relation to the subject site, we support its nomination as a 'mixed use retail/residential precinct'. However, we note the draft strategy suggests a maximum building height of between 7 – 12 storeys for high density locations, or sites within 800 metres of a railway station.

We recommend that the overall height limit for nominated high density locations and/or sites within 800 metres of a railway station, such as the subject site, be increased to 7 – 25 storeys (or up to 75 metres). We make this recommendation for the following reasons:

- The Macarthur – Campbelltown Centre is equivalent to other major Sydney suburban centres such as Bankstown, Blacktown, Penrith, Liverpool or Granville. As stated previously, the Macarthur – Campbelltown Centre is nominated as a Regional City Centre according to the recently released Sydney metropolitan strategy – 'A Plan For Growing Sydney'. We note the maximum building heights for some of these centres range from 38 – 72 metres (Blacktown Local Environmental Plan 2012), 17 – 53 metres (Bankstown Local Environmental Plan 2015), as well as between 14 – 25 storeys for the Granville Centre as proposed by the Draft Parramatta Road Urban Renewal Strategy. Below is an extract of the stated instruments. In this regard, we provide that heights for the Macarthur – Campbelltown Centre should be nominated as between 7 – 25 storeys for the purposes of the strategy, with any site specific heights determined as part of a locality or site specific masterplan.
- As stated earlier, the subject site is large (approximately 6 hectares), in limited ownership and highly accessible. As the Department would be aware, a major obstacle to redeveloping land within most Sydney metropolitan centres is fragmented landownership. In this regard, the subject site is an ideal redevelopment opportunity and its efficiency should therefore be maximised. Importantly, its size will ensure a high degree of both public and private amenity can be achieved.

In addition to the above, we also object to the open space and flooding annotations noted on the plans contained in the draft strategy. Specifically, page 10 of the draft strategy identifies a flooding constraint across No. 4 Tindall Street, whilst page 21 provides for possible public open space also on the same property. In relation to flooding, we provide that this is inaccurate and should be removed from any mapping. We note that the Draft Campbelltown Local Environmental Plan 2014 does not identify any such constraints at No. 4 Tindall Street. We also note that No. 4 Tindall Street is entirely privately owned and almost entirely developed. In this regard, we object to the identification of any public open space on the property at least at this stage of the strategy. In the case site or locality specific master plans are developed, open space provisions could be considered, should

compensatory gross floor area be provided. However, at this stage of the process, we do not believe any public open space should be annotated on private property.



Conclusion

MacroPlan Dimasi was engaged to prepare a submission to the NSW Department of Planning & Environment in relation to the Draft Glenfield – Macarthur Urban Renewal Corridor Strategy. Specifically, the submission relates to land at 1 Bugden Place, 1 Tindal Street and 4 Tindall Street, Campbelltown.

Overall, this submission is in support of the draft strategy. Specifically, it supports its objectives to increase densities along the corridor and provide initiative to renew existing building stock. With the onset of the South West Growth Centre, we provide that the draft strategy is necessary to address any loss of competitive advantage.

Despite the above, we raise concern in relation to the nominated building heights for land in the Macarthur – Campbelltown precinct. Specifically, we recommend that building heights in nominated high density areas and/or land within 800 metres of a railway station, which includes the subject site, should be increased to 7 – 25 storeys. For the purposes of a conceptual strategy, such a range of heights is sufficient to capture any specific heights that are likely to be derived from any detailed locality or site specific master planning process.

Further, the subject site is generous in size, in limited ownership and highly accessible. Building heights up to 25 storeys would enable the opportunities presented by such a site to be realised. Importantly, a site of this size would ensure a high level of public and private amenity could be achieved. Conversely, building heights between 7 – 12 storeys are not likely to incentivise the site's redevelopment, with the subsequent opportunities being compromised.

Lastly, we believe the flooding and public open space provisions identified on No. 4 Tindall Street should be removed.

We would be pleased to discuss or assist the Department on the matter further. In this regard, please contact the undersigned on 9221 5211.

Sincerely,



Carlo Di Giulio
Senior Planner
BTP, MUDD (UNSW)