



11<sup>th</sup> September 2015

Director, Urban Renewal  
NSW Planning & Environment  
GPO Box 39, Sydney NSW 2000

Sent via website: <http://www.planning.nsw.gov.au/glenfieldtomacarthur>

Dear Sir/Madam:

***Re: Glenfield to Macarthur urban renewal corridor - draft strategy on exhibition***

I write to you on behalf of the Scenic Hills Association in relation to the ***Glenfield to Macarthur urban renewal corridor - draft strategy***.

We understand from Campbelltown City Council planning staff that these plans are 'high level strategic plans' rather than detailed plans at this stage (albeit that a lot of detail was included). Our response is therefore at that level and deals with the overall plan to increase development along the length of the train line from Glenfield to Macarthur.

**General Comment**

We are committed to excellence in strategic planning. As part of that, we support the general concept of urban consolidation and job creation around existing infrastructure (particularly public transport) where this means that our important greenspaces, including Campbelltown's Scenic Hills, can be preserved from such development (or related development) in perpetuity.

However we are concerned that this plan for 'urban renewal' is ***not*** about strategic planning as we know it; that it is being planned and executed in isolation from other aspects of planning, from other aspects of the locality and without regard for the individuality of those localities and communities. Traditionally all these things are taken into account in the development of Local Environment Plans, which have regard for the existing social aspects of communities. Are these localities along the train line so unworkable and aesthetically awful that urban renewal is the only outcome? There is no explanation. Without this it appears to be less about urban renewal ***where that is the best outcome for that area***, and more about getting a quick fix for housing supply, and for the NSW economy and state budget from construction (an important but non-sustainable activity) without regard for what will be destroyed and for the individual character and social functioning of these localities.

We therefore flag as a general warning to the NSW Department of Planning & Environment (DOPE) that it should consider the risks of a centralised, 'one-size fits all' approach to planning, noting the well-

documented monstrosities, absurdities and undesirable social outcomes of this kind of planning in former Eastern Bloc communist countries prior to the inevitable collapse of their unworkable centralised economies. These plans are rushed and not backed by proper research.

We document our more specific concerns and other comments below.

### Specific comments

1. As far as we can tell, few people knew about the survey the DOPE claims it conducted before releasing these plans. Further the survey does not appear to have been carried out using a valid or reliable research methodology. Was qualitative research conducted locally to assist in survey development? Was the survey pre-tested to ensure that it met the standards required for scientific research? Certainly the survey was not based on any accepted sampling technique since anyone who found out about it (perchance) could respond. Even if the survey was intended as qualitative research, its construction and sampling left much to be desired. It would thus appear that this 'research' is more of a 'selling technique' for pre-designed plans rather than a demonstration of any intent to tailor-make plans for the community as claimed.
2. While the DOPE has claimed that it has been working with Campbelltown City Council (Council) on this, there are inconsistencies with the Draft Campbelltown Local Environment Plan 2014 (Draft CLEP14) which would need to be resolved if this were to proceed. Surely it would have been better to allow Council to assess and incorporate 'urban renewal' into its Draft CLEP14 rather than stepping over the top of it without regard for all the other planning needs of Campbelltown? The Draft CLEP14, unlike these urban renewal plans, was the subject of **extensive** community consultation as recently as a year ago. It will have been a waste of time for the community and a bad outcome if that community feedback was to be ignored.
3. We have previously supported the idea of urban consolidation and job creation around the train line and in our town centres where it also serves to preserve our green areas from further development. We put this in our submission to Campbelltown Council on the Draft CLEP14. However, unlike the Draft CLEP14, these urban renewal plans are isolated from other aspects of the Campbelltown Local Government Area (LGA), notably the important environmental preservation areas of Wedderburn and the Scenic Hills which are not considered in this. ***The views to and from these areas, their function within our community and any impact from these plans on them (e.g. road upgrading) need to be considered as part of the NSW DOPE's strategy and plans.***
4. Campbelltown Council told us that during the Draft CLEP14 Public Exhibition it had a lot of feedback from people and groups concerned about our **heritage and environment**. These issues are only partially considered in these plans. Notably heritage is seen as an obstacle to these plans which are narrowly focused on urban renewal. ***Campbelltown's heritage gives it a unique character and point of difference that should be celebrated in any planning – not seen as an 'impediment'.*** Urban renewal should offer opportunities to remove unsympathetic past development around important heritage and replace it with a more sympathetic context so that

it can be better appreciated...while conserving what remains. Heritage precincts not only enhance our cultural appreciation and identity but can also be an important economic contributor through increased tourism.

5. We welcome the plans' focus on development within walking distance of public transport, the upgrading of public transport to support this concept and the encouragement of cycling. This takes the pressure off roads and reduces pollution from cars. However the Integrated Transport Strategy that the public transport connects with is not the current approved one in the South West Growth Centre Structure Plan. There is no environmental assessment for it and it has never been publicly exhibited. This has the potential to compromise the Public Exhibition of the ***Glenfield to Macarthur urban renewal corridor draft strategy***.
6. In particular we object to the proposal hidden within the Integrated Transport Strategy to open up St Andrews Road through the Scenic Hills, which is not required for the development of the South West Growth Centre (as claimed) and has never been in its plans, having been excluded on environmental grounds in the past. We first became aware of this proposal when it appeared in the ***Draft Leppington Precinct Plan (Precinct Plan)*** last year, which we responded to at the time and which we still stand by. We understand from the Growth Centres Offices that the inclusion of this proposal was a mistake by the consultant for the Precinct Plan who had been given an 'unapproved' strategy from the Roads and Maritime Services (RMS). We are deeply concerned about this proposal's appearance again here within the same 'unapproved' Integrated Transport Strategy from 2011 - particularly as a former RMS Regional Manager had told us that the RMS had 'no plans' to open up St Andrews Road even while (as we have now discovered) this plan was already in existence. We also note that this proposal is consistent with the plans of a local developer lobby, which in turn is consistent with similar representations to the Growth Centres Commission in the past. This undermines confidence in the planning, the DOPE and the NSW Government generally, since this can only occur through either incompetence or inappropriate influence by the development lobby. It causes us to wonder what other issues may be contained within the ***Glenfield to Macarthur urban renewal corridor draft strategy*** plans that have similarly ***not*** been subjected to proper process but are implicitly, rather than explicitly, part of the public exhibition process.

### **In Conclusion**

Overall, we support the general concept but with the above qualifications regarding its development and execution.

Yours sincerely



Jacqui Kirkby  
Scenic Hills Association