

11 September 2015

The Department of Planning and Environment

Via file upload to http://planspolicies.planning.nsw.gov.au/index.pl?action=view_job&job_id=7180

Dear Sir / Madam,

Glenfield to Macarthur Urban Renewal Corridor Strategy

We write on behalf of our client, Perron Group, owners of Campbelltown Mall Shopping Centre (CMSC) in response to the public exhibition of the Glenfield to Macarthur Urban Renewal Corridor Strategy). Perron Group's landholdings are marked on the aerial photograph below.

FIGURE 1 – CAMPBELLTOWN MALL SHOPPING CENTRE SITE (7.2HA)



Source: NearMap, 2014

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SA5476_PERRON_GLENFIELD MACARTHUR SUBMISSION_FINAL

Perron Group appreciates the opportunity to make a submission addressing the following matters:

- Overall support of the thrust of the Strategy;
- The strategic significance of Campbelltown Mall Shopping Centre, and Perron's ambitions for the future of the site; and
- Alignment of the Strategy with previously adopted Council plans and strategies

The above matters are outlined in the following submission.

1 Overall Support for Strategy

On behalf of our client, we wish to congratulate the Department of Planning and Environment (DPE) for working with Campbelltown City Council, government agencies and the local community to look at a holistic approach to planning for this important transport corridor, including the Regional City of Campbelltown-Macarthur.

We support the continued focus on the primacy of the Regional City, and endorse the approach of aiming for a differentiated role for the smaller centres (such as a sport and recreation focus for Leumeah).

We support the forward planning and forward funding of infrastructure by State and Local Governments within the corridor. The aim of this should be to ensure that bottlenecks which would prevent timely renewal are adequately addressed, so that development can proceed with greater certainty both around infrastructure capacity and around development contributions costs.

2 Campbelltown Mall Shopping Centre Strategic Opportunities

Campbelltown Mall is the CBD's largest shopping centre. A regional shopping centre on a substantial 7.2 hectare landholding, it supports 42,000sqm lettable area including three supermarkets, two discount department stores, and 90+ specialty stores, alone with parking for 1800 cars.

The centre has been owned by Perron Group since 1998. Perron Group is a privately owned Perth based Group of Companies whose main business activity is property investments. The diverse property portfolio consists of retail shopping centres, commercial office buildings and industrial properties in WA, NSW, Victoria and SA. The Group has joint ventures with major institutions such as Scentre (formerly Westfield), Mirvac, Vicinity (formerly Federation / Centro) and Dexus.

Retail is a dynamic industry, and shopping centres need to constantly evolve to remain relevant to the community. Due to the site's large size and position, being in close proximity to the railway station, buses and Koshigaya Park, Perron recognises the significant opportunities this site offers. There is the potential to extend the existing retail offer and add the following uses:

- Residential apartments
- Entertainment precinct
- Food and beverage precinct
- Health and Medical
- Civic and community uses.

To this end, Perron Group has commissioned architects to prepare preliminary concepts for a substantial mixed use scheme. While the details of the concepts remain confidential at this stage, Perron has identified an exciting opportunity to accommodate the above listed uses, including a minimum of 750 apartments, while introducing a stronger community public benefit including a much improved interface with the Queen Street heritage precinct.

FIGURE 2 – CAMPBELLTOWN MALL SHOPPING CENTRE – INDICATIVE FUTURE CONCEPT



On behalf of Perron, we request that the Strategy have regard to the particular potential available on this site, and ensure that a broad range of land uses continue to be permissible on the site.

3 Alignment of the Strategy with previously adopted Council plans and strategies

Perron worked with Campbelltown Council throughout with the Draft Campbelltown LEP preparation process.

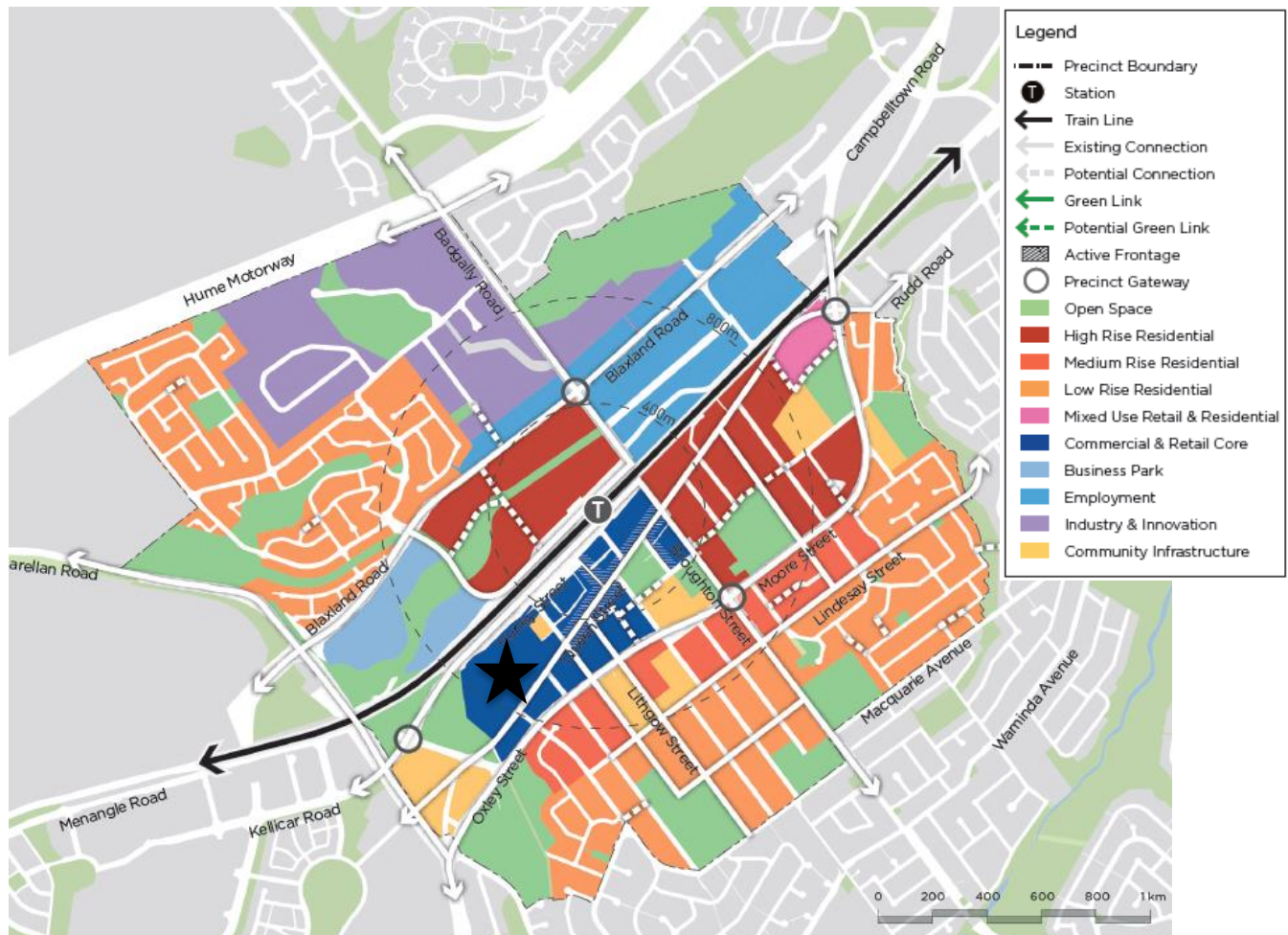
Under the draft LEP as adopted, the Campbelltown Mall site will be zoned B3 Commercial Core. A wide range of uses are to be permitted in that zone, including both shop top housing and residential flat buildings. A height limit of 32m is to be imposed, with no FSR limit.

Perron Group had a number of concerns with the draft LEP as exhibited. However, in response to submissions made by Perron Group and other landholders, a number of key amendments to the exhibited draft LEP were recommended by Council officers and adopted by Council.

Due to Council's responsiveness to the draft LEP submissions, Perron Group fully supports the Draft Campbelltown LEP as adopted by Council on 28 April 2015. As such, we are keen to ensure that the Strategy reflects the shared aspirations of Perron and Council in relation to the future opportunities for the site.

In the draft Structure Plan contained in the Strategy, Perron's site is identified at the western edge of the Commercial and Retail Core.

The exhibited draft Structure Plan is illustrated below.



Perron Group wishes to raise concern with certain apparent inconsistencies with the Draft LEP as adopted.

- The Strategy's identification of a commercial and retail core, with residential and mixed use elsewhere in the precinct, suggests residential uses could be prohibited or somehow discouraged in the core.
- Perron strongly opposes a prohibition on residential development in the commercial and retail core. A successful town centre today requires a genuine mix of uses, not a sterile commercial core ringed by high rise residential uses. Mixed Use Centres are advanced in every metropolitan strategy for Australia's capital cities as the cornerstone for sustainable growth by absorbing a large share of future population and jobs growth. The basic premise is that clustering a range of land uses and activities into centres helps reduce greenfield expansion, locates similar businesses together for productivity benefits and gives people the opportunity to live closer to jobs and services thereby reducing reliance on private vehicles and increasing the viability of high frequency public transport.
- Further, this move would be entirely inconsistent the existing zoning and adopted draft zoning for the Campbelltown CBD, which seeks to create a mixed use centre with demand-led opportunities for a range of development types in a high amenity precinct.

- In relation to building height, the Strategy indicates that Campbelltown should have building heights of “7-12 storeys in the vicinity of the station”. In contrast, the draft LEP building heights equate to between 8-12 storeys, with up to 15 storeys close to the station. There is no basis whatsoever for the Strategy to propose a reduction in building heights, and we recommend that the Strategy be revised to reflect the heights in the adopted draft LEP.

4 Conclusion

In conclusion, we support the Government’s initiative, but seek to ensure that Campbelltown remains primacy as a strong, mixed use Regional City through appropriate building heights and flexibility in land uses. We ask that the Department take our submission into account when finalising the strategy and structure plan.

We thank you for the opportunity to make a submission and ask that you contact the undersigned on 8233 7609 if any clarification is required

Yours sincerely,



Alison Brown
Associate Director