

Submission on Glenfield to Macarthur Urban Renewal Corridor (Ingleburn Precinct)

Prepared for:

Ingleburn Business Chamber

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1. Overview

NSW Department of Planning and Environment (**DPE**) is currently exhibiting the Glenfield to Macarthur Urban Renewal Corridor Land Use and Infrastructure Strategy (**GMURC Strategy**). The Ingleburn Business Chamber (the **Chamber**) represents commercial, retail, and industrial businesses, together with property owners, located within the Ingleburn area. The Chamber works to actively promote and progress Ingleburn.

The GMURC Strategy provides a plan to support an additional 1,400 dwellings, and 250,000m² of employment land to support an additional 4,000 jobs by 2036 within the Ingleburn Precinct.

The exhibition of the GMURC Strategy follows on from Campbelltown City Council's recent exhibition of the draft Ingleburn Structure Plan, which the Chamber provided feedback on. This draft Structure Plan proposed a planning strategy to deliver an additional 3,000 dwellings and 25,000 square metres of new retail and commercial floor space within the Ingleburn Centre and surrounds. This submission on the GMURC Strategy refers to the Chamber's earlier submission on the Structure Plan. A copy of this submission is attached at **Appendix A**.

The Chamber is largely supportive of the DPE's strategy to encourage housing and employment growth within the corridor and specifically within the Ingleburn Precinct. To build on this, the Chamber proposes further refinement of the strategy. This is to review and clarify aspects to ensure the strategy can be delivered effectively and builds on local knowledge from within the local area.

This submission raises the following items in relation to the GMURC Strategy:

1. Height limit along Oxford Road and setbacks
2. Ingleburn commercial centre land uses
3. Roads, transport and parking:
 - a. Georges River Parkway
 - b. Corridor between Georges River Parkway and Camden Valley Way
 - c. Road connection between Ingleburn and Minto Industrial areas
 - d. Bus transport route (Campbelltown to Liverpool)
 - e. Commuter car parking

A number of recommendations are included in the conclusion to this submission. We consider that if these recommendations are implemented then this would result in a more robust Strategy that more effectively responds to the economic circumstances, and access and development constraints and opportunities in the Ingleburn Precinct.

2. Height limits and setbacks

Ingleburn needs to be supported by planning controls that result in redevelopment and revitalisation. Controls that maintain the status quo of run-down commercial properties in the commercial core will not achieve the planning vision.

The GMURC Strategy outlines a vision for the Ingleburn Precinct. The vision for the future built form is to:

- (a) Maintain the scale and village feel of Ingleburn town centre by restricting buildings fronting Oxford Road to two storeys, with higher buildings set back from the street.
- (b) Enable residential and commercial buildings between 4 and 8 storeys close to the station and surrounding the town centre to maximise pedestrian activity and increase trade for local businesses.

The Chamber has previously raised concern with the unreasonably restrictive height limit particularly along Oxford Road in a previous submission to Campbelltown City Council (see **Appendix A**). This submission was in relation to the draft Ingleburn Structure Plan with relevant points reiterated below based on the proposed objectives for the Ingleburn Precinct within the GMURC Strategy.

Village feel

Vision 2(a) above references maintaining a 'village feel' by restricting buildings fronting Oxford Road to two storeys in height. However, building height is not the sole contributor to creating a village type feel. A village atmosphere is achieved through the interplay of a variety of elements and is not solely related to density and building height. The characteristics of a village are achieved through:

- High pedestrian activity and interaction of people on the street
- A safe, low speed vehicle environment for pedestrians
- High quality public spaces including street trees, wide footpaths, weather protection elements (awnings), street art, pockets of green space and open squares for people to congregate
- Compactness to enable easily pedestrian movements throughout the village
- Density within in the core of the village to support high pedestrian activity and a compact village design
- A mix of land uses including residential, commercial, retail and community services
- Late night trading to support restaurant and other retail uses to encourage activity in the evening period
- Good links to public transport.

The 'feel' pedestrians get of the Ingleburn village is at ground level as they walk through the town centre. Oxford Road has a generous width within the town centre varying between 30 metres to around 60 metres. This width means that higher buildings at the street interface would not be out-of-scale. The building interface at street level is important and this can still be of a

relatively low scale without compromising the village feel. It is considered 2 to 4 storeys would still be a reasonable outcome balancing the needs of land owners and maintain a 'village feel'.

One of the main attributes for creating a village feel that Ingleburn currently lacks is the density in population in the town centre. Policies aimed at increasing the density within Ingleburn, including both the GMURC Strategy and draft Ingleburn Structure Plan, should explicitly support the revitalisation of Oxford Road. Attracting investment and development into quality buildings in Oxford Road will be critical to revitalisation of Ingleburn. If land owners are restricted to redeveloping buildings to no more than 2 storeys along the entire depth of these properties, most of which are already 2 storeys in height, they will not be incentivised to redevelop.

The Chamber supports a more compact density profile within Ingleburn which consists of:

- 2-4 storeys along Oxford Road interface
- Up to 8 storeys between 10-20 metres and 100 metres back from Oxford Road
- Up to 12 storeys between 100 and say 200 metres back from Oxford Road, and along the Ingleburn Road / railway spine
- Stepping down in building heights further away from the centre of activity.

The building height controls in the final GMURC Strategy need to be reviewed in light of Ingleburn's flooding constraints. We understand that a flood study is currently being undertaken for the Ingleburn area. Should the findings of that study recommend that no underground parking be provided due to flood impacts, height limits should be increased to allow economically feasible developments incorporating car parking and all other permissible uses at or above ground level.

It is recommended that:

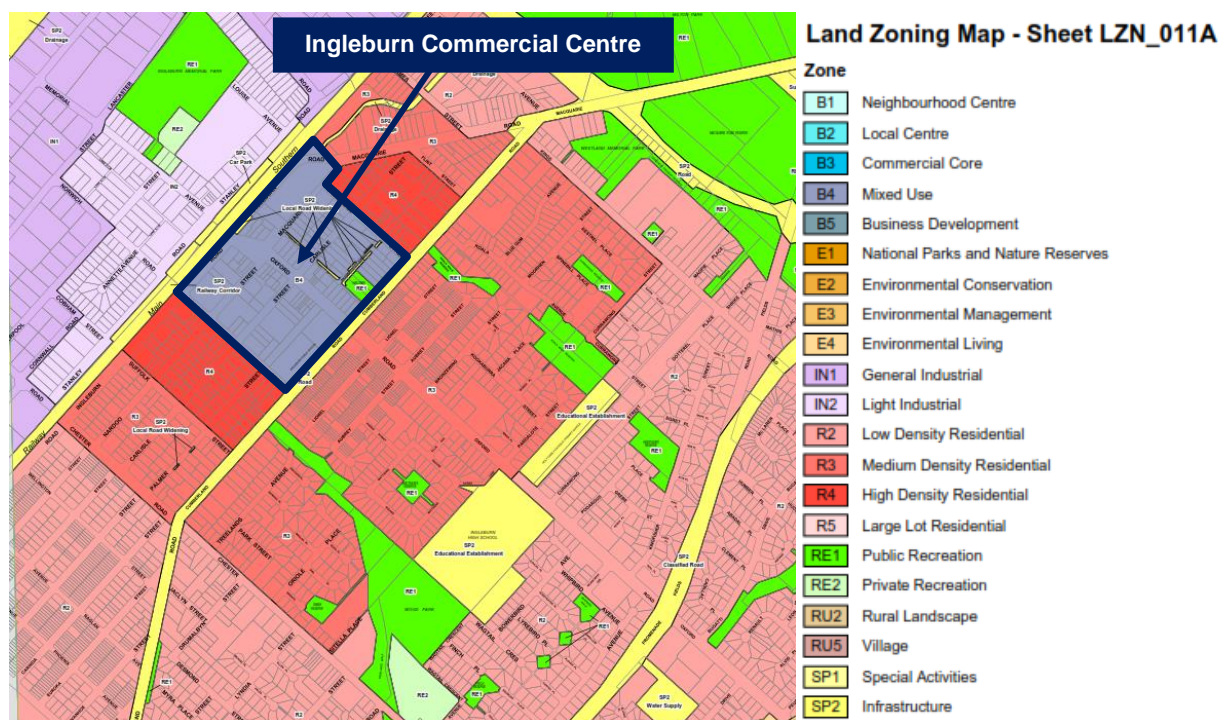
1. Building heights, particularly along Oxford Road, are reviewed to incorporate:
 - a. 2-4 storeys along Oxford Road
 - b. Up to 8 storeys between 10-20 metres and 100 metres back from Oxford Road
 - c. Up to 12 storeys between 100 and 200 metres back from Oxford Road, and along the Ingleburn Road / railway spine.
2. The Ingleburn Flood study be finalised and the recommendations / limitations identified within this study be considered as part of the recommendations for the Ingleburn Precinct.
3. Other characteristics are considered in achieving a village feel for Ingleburn and not just building height.

3. Ingleburn commercial centre land uses

Ingleburn is first and foremost a service centre. The Chamber welcomes initiatives that encourage new residential dwellings and more people living close to the centre. However, this should not come at the expense of allowing commercial development where the market demands.

Campbelltown City Council is currently in the process of finalising Campbelltown Local Environmental Plan 2013 (draft LEP).

An extract of the draft LEP relating to the Ingleburn town centre is shown in **Figure 1** below.



Source: Draft Campbelltown Local Environmental Plan 2013

Figure 1 Draft land use zoning – Ingleburn town centre

The Ingleburn commercial centre is located within an area edged by the Southern Railway Line (northwest), Cambridge Street (northeast), Cumberland Road (southeast) and Norfolk Street (southwest).

The draft LEP illustrates that the Ingleburn commercial centre is intended to be zoned B4 Mixed Use. It is intended that this zone will permit a range of uses including commercial land uses as detailed below:

Amusement centres; Boarding houses; Car parks; Child care centres; Commercial premises (Business premises – (Funeral homes); Office premises; Retail premises – (Bulky goods premises; Cellar door premises; Food and drink premises – Pubs; Restaurants or cafes; Small bars; Takeaway food and drink premises); Garden centres; Hardware and building supplies; Kiosks; Landscaping material supplies; Markets; Plant nurseries;

Roadside stalls; Rural supplies; Shops – (Neighbourhood shops); Timber yards; Vehicle sales or hire premises; Community facilities; Drainage; Earthworks; Educational establishments (schools); Entertainment facilities; Environmental facilities; Environmental protection works; Flood mitigation works; Function centres; Helipad; Home businesses; Home occupations; Hotel or motel accommodation; Information and education facilities; Medical centres; Mortuaries; Passenger transport facilities; Places of public worship; Public administration buildings; Recreation areas; Recreation facilities (indoor); Recreation facilities (outdoor); Registered clubs; Residential Flat Buildings; Respite day care centres; Restricted premises; Roads; Seniors housing (Residential care facilities); Service stations; Serviced apartments; Shop top housing; Signage (Advertising structures; Building identification signs; Business identification signs); Veterinary hospitals.

The GMURC Strategy's Ingleburn Precinct plan shows an alternate land use proposal for the Ingleburn commercial centre – refer to **Figure 2**.



Source: Department of Planning and Environment

Figure 2 GMURC Strategy Ingleburn Precinct land use strategy

The Ingleburn Precinct land use plan within the GMURC Strategy proposes a mix of land uses including:

- Commercial and Retail Core (along the railway line)
- Mixed Use Retail and Residential (along Oxford Road and part of the railway line)
- Community Infrastructure (relating to Ingleburn Public School)
- High Rise Residential (within the remaining commercial centre locations)

Significantly, the GMURC intends to contract the opportunities for retail and commercial land uses in the commercial centre. The Chamber raises strong concerns with the proposed land use pattern illustrated within the Ingleburn Precinct.

Ingleburn is recognised as a 'district retailing centre' within Campbelltown (Urban Area) Local Environmental Plan 2002. The reduction of retailing floor area within the town centre would significantly reduce the ability to provide the additional shops and services expected in a district centre that is intended to accommodate an increased surrounding population.

The draft Ingleburn Structure Plan noted that Ingleburn provides 26,200 square metres of shopfront retail floor space. One recommendation of the draft Ingleburn Structure Plan was to 'create the opportunity for the development of 25,000 square metres of new retail and commercial floor space to provide new jobs and local services for the existing and future population of Ingleburn'. This was supported by the finding of consultants Hill PDA who undertook a review of the Business Centres within the Campbelltown LGA. The GMURC Strategy contradicts this recommendation by proposing a reduction in land zoned for business purposes.

The GMURC Strategy identifies that 'the mixed use commercial and retail town centre on Oxford Road will provide additional floorspace to meet future demand' (p.26). The GMURC Strategy identifies that the Ingleburn Precinct will generate a demand by 2036 for an additional 44,000m² of retail floor area and 135,000m² of industrial floor area. Noting that Oxford Road is already zoned for commercial and retail type uses, it is unclear how the proposed land use plan which proposes a reduction in this B4 Mixed Use zoning (under draft LEP), will facilitate the anticipated increase in floor area.

The most desirable outcome would be to retain the current extent of Business zoned land within the Ingleburn commercial centre.

This could be achieved through applying the B4 Mixed Use zoning to the Ingleburn town centre, as currently proposed in the draft LEP. The B4 zone under draft Campbelltown LEP is proposed to permit, among other uses, 'commercial premises', 'shops', 'residential flat buildings', 'shop top housing'. The range of uses proposed under Campbelltown draft LEP 2014 would enable the market to determine the demand for retail and commercial floor space. The flexibility within this zoning would also enable the town centre to adapt over time to accommodate fluctuations in retail and commercial demand generated.

To protect certain areas of the town centre and ensure a minimum level of commercial and retail floor space is achieved, a map could be inserted into the LEP identifying particular streets and locations that must provide active frontages consisting of retail / commercial land uses along the ground level (i.e. Oxford Street, parts of Nardoo Street, etc.). Outside of these areas, owners would have the option to develop sites for the purpose of other permitted land uses, including wholly residential developments.

It is recommended that:

- a. Amend the land use zoning within the Ingleburn Commercial Centre to B4 Mixed Use in line with that proposed under draft Campbelltown LEP 2013.
- b. Prepare 'active street frontage' maps to incorporate within draft Campbelltown LEP 2013. These maps would identify locations to be comprised of retail and/or commercial land uses at the ground floor which could be outlined within the LEP.

4. Roads, transport and car parking

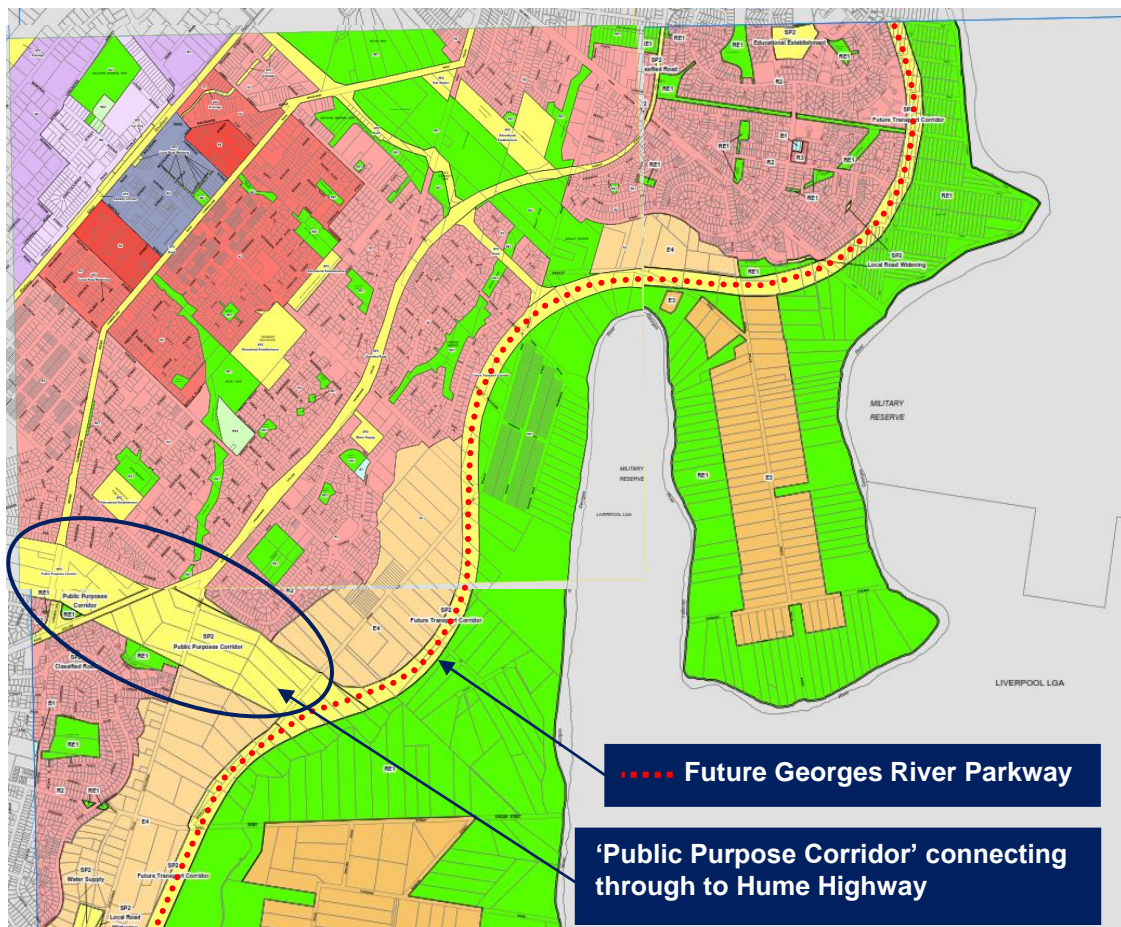
Transport access is critical to the future prosperity of the Ingleburn commercial centre. The centre's attractiveness is reduced by minimal cross-railway vehicular connections, minimal bus services, and car parking conflicts. These drawbacks can be addressed by prudent investment in new infrastructure.

Georges River Parkway

The Georges River Parkway is a potential future north-south road generally located along the western side of the Georges River. It extends from Glenfield in the north through to St Helens Park in the south.

The draft Campbelltown Local Environmental Plan 2014 identifies a corridor for this purpose zoned 'SP2 Infrastructure - future transport corridor'. The full extent of the future Georges River Parkway is illustrated within **Appendix B**. This corridor will form a major transport connection within the Campbelltown area and should be included within the Department's Land Use and Infrastructure Analysis.

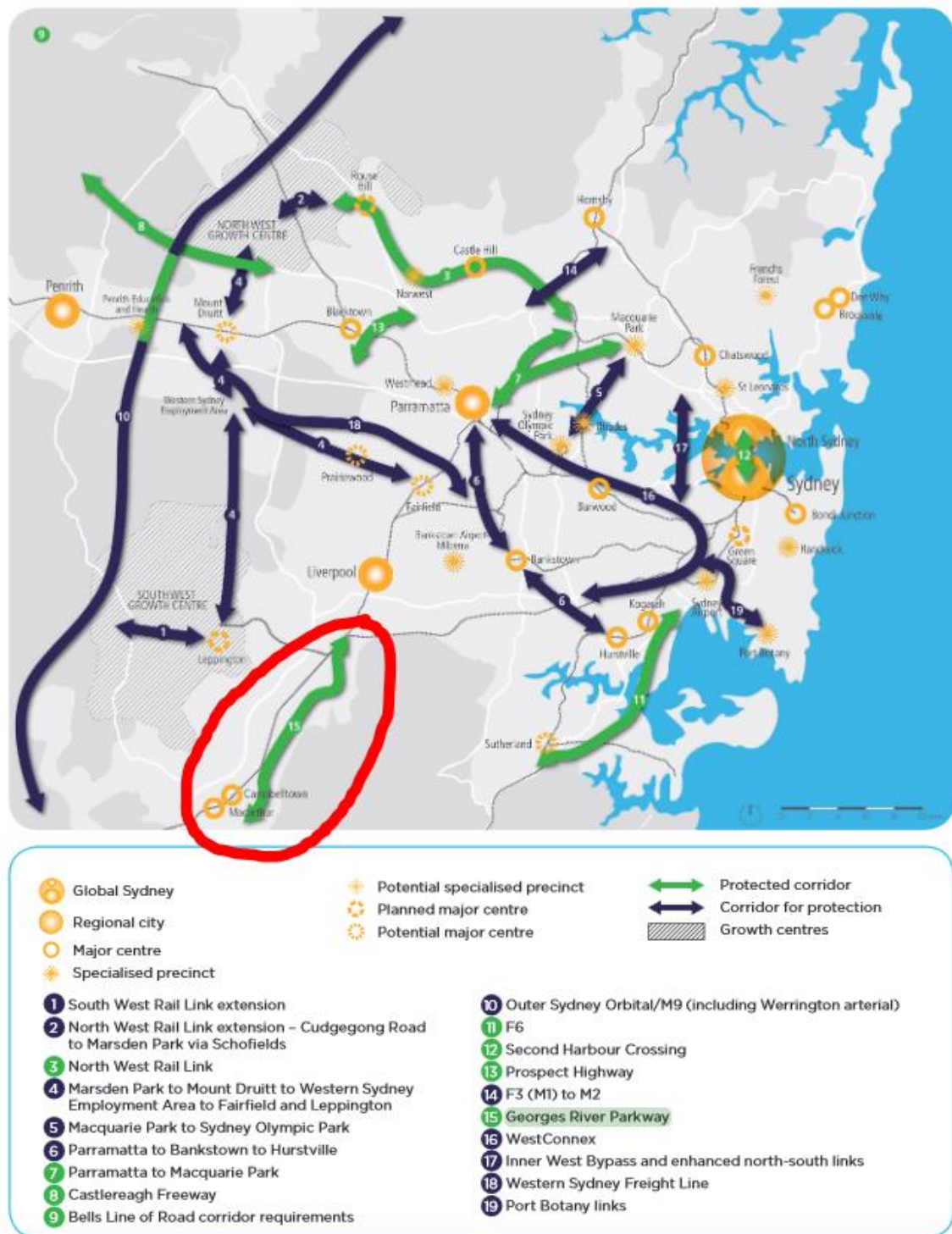
The portion of George's River Parkway relating to the Ingleburn Precinct is illustrated in **Figure 3**. The GMURC Strategy's transport and movement plan should be updated to include this important future link road through Campbelltown LGA. The links between this future major corridor and Ingleburn should also be highlighted within the plan.



Source: Draft Campbelltown Local Environmental Plan 2014

Figure 3 Extract of draft Campbelltown LEP 2014 showing omitted transport links

The Georges River Parkway is also highlighted within Transport for NSW's Long Term Transport Master Plan – refer to **Figure 4**. It is considered relevant to include this future road within the GMURC Strategy to ensure consistency between strategic documents and include this future road connection.



Source: Transport for NSW – NSW Long Term Transport Master Plan 2012

Figure 4 Protected transport corridors within Sydney

It is recommended that the Georges River Parkway is added within the plans to highlight this important future north-south connection within the Campbelltown LGA and local linkages within each precinct.

Corridor between Georges River Parkway and Camden Valley Way

Draft Campbelltown LEP 2014 includes a wide corridor between the future Georges River Parkway and Hume Highway – refer to **Figure 3**. This land is proposed to be zoned ‘SP2 Public Purpose Corridor’ and will likely form another transport connection within the area.

The GMURC Strategy’s Ingleburn Precinct plans show this area as ‘Open Space’ which is inconsistent with draft Campbelltown LEP 2014.

Further consultation should be undertaken with Council to confirm the reasoning behind the corridor reservation. On the basis that this corridor forms part of a wider transport masterplan within the Campbelltown LGA, this corridor should also be included within the GMURC Strategy to provide a holistic review of future transport connections and how they integrate together.

The Chamber has prepared a road strategy for the area which further illustrates the location of this corridor (**Appendix B**). The road strategy plan highlights a broader strategic justification for this corridor which ultimately connects the future Georges River Parkway through to Camden Valley Way (along St Andrews Road) providing an east west connection through Campbelltown LGA. Noting the level of development currently being undertaken along Camden Valley Way as part of the South West Growth Centre, this road future corridor connection would likely ease traffic congestion on other east-west connections within the LGA. It would also provide linkages to Ingleburn Station and public transport connections for these residents.

It is recommended that:

- Further consultation is undertaken with Campbelltown City Council to clarify the Campbelltown LGA transport masterplan to clarify the role of this corridor.
- The reference to open space along this corridor within the Ingleburn Precinct maps is updated for the purpose proposed.
- The plans within the GMURC Strategy are updated to identify this corridor as a potential future link between Georges River Parkway and Camden Valley Way.

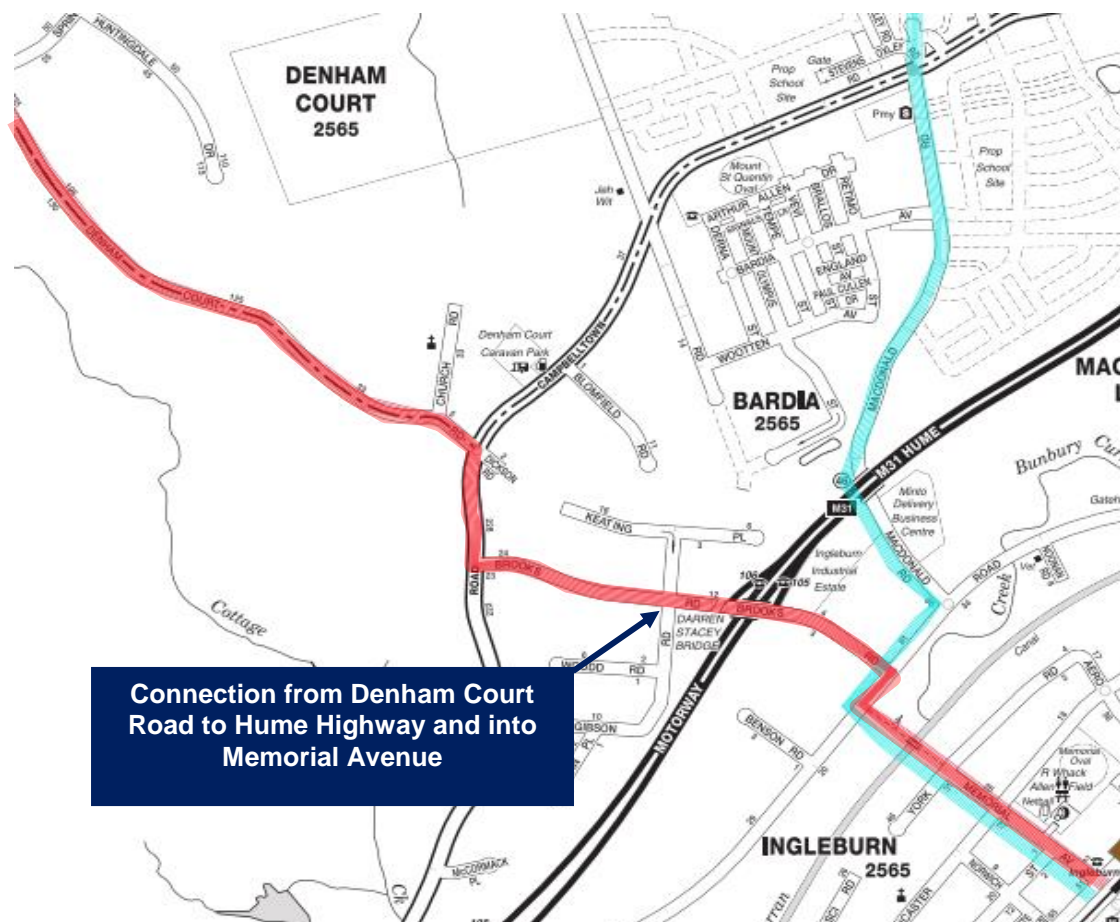
Road connection between Ingleburn and Minto Industrial areas

The Chamber is keen to see a connection provided between the Ingleburn and Minto Industrial areas. This would provide a better connection for heavy transport vehicles travelling between the two areas as opposed to the current connection via Campbelltown Road. The proposed connection would also provide access for heavy vehicles from Ingleburn through to Leumeah and even Badgally Road.

The Chamber sees this connection as being an essential component of an overall road strategy related to the Ingleburn Precinct.

Connection from Denham Court Road to Hume Highway and Memorial Avenue

The existing road network provides an opportunity to create an additional east-west road connection. This would connect Denham Court Road into the Hume Highway and ultimately with Memorial Avenue in the Ingleburn Precinct. This connection is shown within **Figure 5**.



Connection from Denham Court Road to Hume Highway and into Memorial Avenue

Source: Chamber Road Strategy

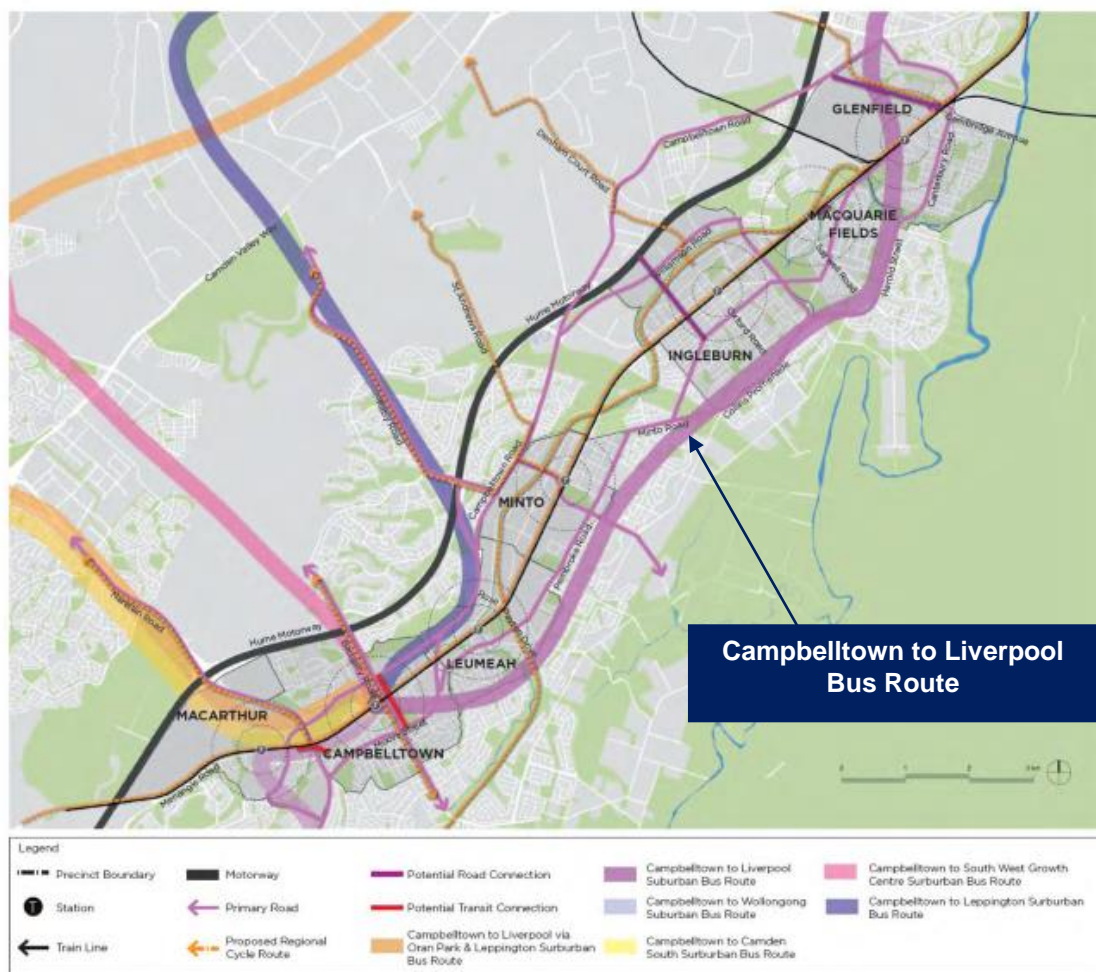
Figure 5 Connection between Denham Court Road, Hume Highway and Memorial Avenue

The majority of infrastructure relating to this connection route is in place. A new intersection would be required from Brooks Road to connect the east and west side of the Hume Highway.

Bus transport route

The GMURC Strategy identifies a future bus transport route between Campbelltown and Liverpool (via Glenfield) – **Figure 6**. This route shown in the Strategy bypasses Ingleburn commercial centre and railway station.

Council's draft Ingleburn Structure Plan has been prepared to support an additional 3,000 new dwellings and 6,000 new residents. This bus route should be reviewed and re-aligned through the emerging Ingleburn town centre instead of running along the eastern periphery of Ingleburn. This would support and provide additional transport options to future residents to conveniently connect with employment opportunities in Liverpool LGA and in other parts of Campbelltown LGA.



Source: Glenfield to Macarthur Corridor Integrated Transport Strategy, Cardno 2015

Figure 6 Concept corridor transport network

The provision of multimodal connections (train and bus) within Ingleburn is considered a higher priority than that of Glenfield. Glenfield currently has a direct train connection to Liverpool with commuters unlikely to utilise this bus route with direct train services available. In comparison, commuters that would need to make multiple connections along public transport routes are more likely to use a transport mode which avoids the need for changes (i.e. a bus from Ingleburn to Liverpool).

The diversion of the bus route through Ingleburn would minimise the need for multi-trips by residents and support the anticipated increase in residential population within the Ingleburn town centre.

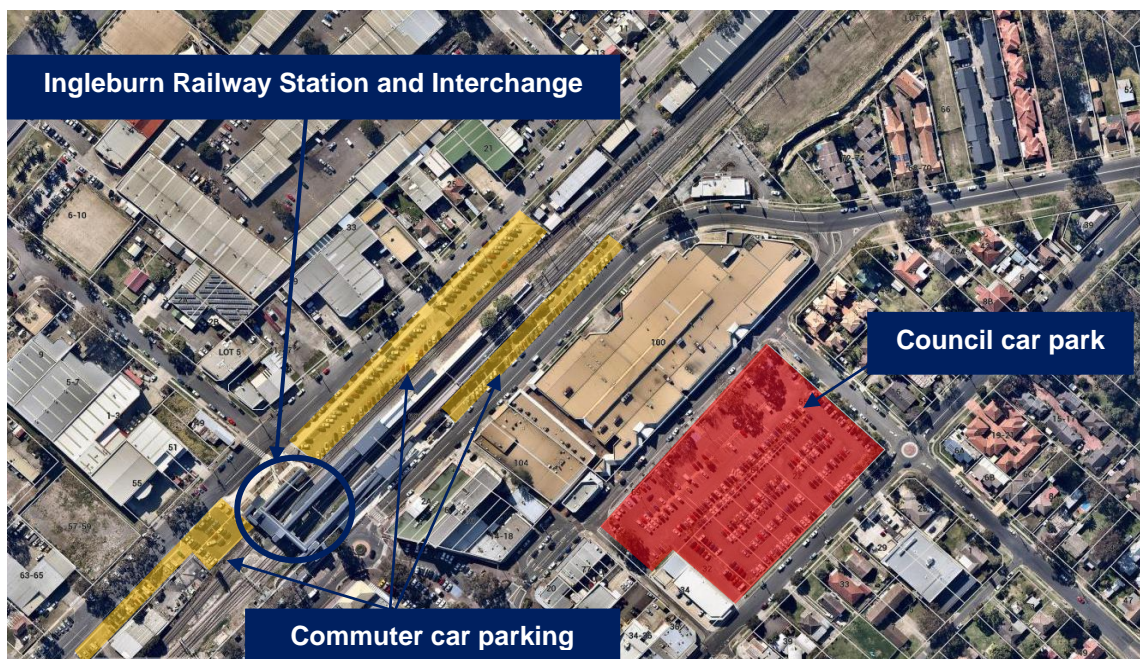
An alternate proposal for the Campbelltown to Liverpool bus route is shown within **Appendix C**. This map shows how this bus route could be diverted through Ingleburn to support the future increase in population within the town centre.

Commuter car parking

Ingleburn currently has limited commuter car parking spaces. While there are existing car parking areas within Ingleburn, they are needed to cater for the Ingleburn Fair and Ingleburn Town Centre shopping developments, with time limited parking available along Oxford Road. Despite the timed parking restrictions many of the centre's on street and off street car parking spaces are occupied during business hours by commuters' vehicles.

Should Campbelltown Council decide to redevelop its car park site that is located to the south-east of Ingleburn Fair, this could result in a significant amount of displaced parking within the town centre.

Currently, commuter parking is available in small areas located along the train line – refer to **Figure 7**.



Source: NearMaps

Figure 7 Location of commuter parking within Ingleburn

A dedicated commuter car parking facility is needed within Ingleburn. This car park would:

- Encourage the use of public transport, including both bus and train connections, at this interchange by providing needed facilities.
- Provide a smoother transition for local residents wanting to utilise this public transport by providing a dedicated area to park.
- Improve parking congestion along residential streets due to a lack of supply.
- Ease demand within the Ingleburn town centre from competing users (shoppers and commuter parking).

To facilitate future growth and encourage public transportation, particularly when the Council car park is redeveloped, a more long term parking solution for commuters will be needed. Transport for NSW (**TfNSW**) should be included within the consultation to assist in identifying opportunities for future commuter parking opportunities within the Ingleburn town centre.

5. Conclusion and recommendations

The Chamber supports the State Government's initiatives to promote growth and revitalisation in Ingleburn. A number of the items included within the GMURC Strategy will facilitate the progression of development within Ingleburn which the Chamber supports.

After reviewing the GMURC Strategy the following changes are considered necessary to facilitate the next level of planning for the area and / or integrate with other strategic plans:

1. The blanket 2 storey height limit on Oxford Road properties will not achieve the 'village feel' objective and should be removed. Instead, stepped building height controls allowing viable developments up to 4 storeys along Oxford Road and taller buildings stepped back from the road frontage should be allowed.
2. The Ingleburn Precinct within the GMURC Strategy should be updated to provide for a more compact centre within higher developments up to 12 storeys in the streets near Oxford Road and suitable developments up to 4 storeys along Oxford Road.
3. Review height limits following the finalisation of the Flood Study for the Ingleburn area.
4. Amend the proposed zoning within the Ingleburn town centre that preserves the extent of Business zoned land. A B4 Mixed Use zone is recommended so as to provide flexibility to develop sites for different purposes including 'shops', 'commercial uses', 'residential flat buildings' and 'shop top housing' or a mix of uses depending on the market demand.
5. Review the need to incorporate an 'activate street frontage' plan to protect certain areas within the Ingleburn town centre for retailing and commercial uses. This would be for land zoned B4 where the proposed permissible uses include non-retail and commercial uses (i.e. residential flat buildings).
6. Encourage residential uses above ground level within Ingleburn commercial along Oxford Road (i.e. mixed use zoning to support both commercial and residential uses).
7. Include both the future Georges River Parkway and other corridor links between the Georges River Parkway & Camden Valley Way and from Denham Court Road to Memorial Avenue within the transport masterplan. These future major roads are included within other strategic policies will support local connections through the LGA and link to the individual precincts within the GMURC.
8. Identify a direct road connection between Ingleburn and Minto Industrial areas.
9. Liaise with TfNSW to identify a site for a future commuter car park around Ingleburn railway station and interchange.
10. Review and amend the bus route proposed between Campbelltown and Liverpool so that it passes nearer to the Ingleburn commercial centre so that it will more effectively support the future residential growth within this area.

Submission on Draft Ingleburn Structure Plan

Prepared for:

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6 February 2015



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1. Overview

Campbelltown City Council (**Council**) is currently exhibiting the draft Ingleburn Structure Plan (the **Plan**). The Ingleburn Chamber of Commerce and Industry Inc. (the **Chamber**) represents commercial, retail, and industrial businesses, together with property owners, located within the Ingleburn area. The Chamber works to actively promote and progress Ingleburn.

The draft Plan proposes a planning strategy to deliver an additional 3,000 dwellings, 6,000 residents and 25,000 square metres of new retail and commercial floor space within the Ingleburn Centre and its surrounds.

The Chamber is supportive of the Structure Plan initiative and most of the policies contained in the draft. However, there are several parts of the Plan that need adjusting if Ingleburn is to achieve the vision of 'a thriving hub of community exchange and interaction within a vibrant attractive urban centre.'

The Chamber has engaged GLN Planning (**GLN**) to review and prepare a written submission on the draft Plan. GLN has reviewed the draft Plan to assess the implications of the Plan's planning vision and proposed planning controls for the betterment of the general Ingleburn area.

This submission responds to the draft Plan in terms of the following themes:

1. Focus of the draft Plan
2. Achieving a village feel
3. Retail
4. East of Cumberland Road
5. Social Infrastructure
6. Car parking

We make the following recommendations to Council to ensure the Plan's objectives are achievable:

- Oxford Road should be the subject of a detailed planning and design exercise in order to formulate appropriate building controls for private development, and a concept plan that improves the experience for pedestrians in the street environment.
- Create a planning framework for Oxford Road properties that will incentivise land owners to revitalise Ingleburn's main street.
- The blanket 2 storey height limit on Oxford Road properties will not achieve the 'village feel' objective and should be removed. Instead, stepped building height controls allowing viable developments up to 6-8 storeys set back from the road frontage should be allowed.
- Residential uses above ground level should be encouraged along Oxford Road (i.e. mixed use zoning to support both commercial and residential uses).
- The Structure Plan should provide for a more compact centre with higher developments up to 12 storeys in the streets near Oxford Road, and retention of 2 storey height limits in the far northern and southern parts of the plan area.
- Improve connections across the railway line (east-west) and between Memorial Oval and Milton Park (both vehicle and pedestrian) for local access.

- Determine the preferred location and amount of additional and / or augmented open space that is needed to support the projected future residential population within Ingleburn Centre.
- Include an additional public park 3,000 to 5,000 square metres in size provided in a central location in the town centre. Detailed strategies for improved pedestrian and cycle links to existing open spaces in the area should also be prepared.
- Large scale retail opportunities should not be permitted on the western side of the railway unless there is firm commitment from Council or the State Government to provide suitable cross-rail transport links.
- Ensure that the current amount of public car parking opposite Ingleburn Fair is perpetuated in any redevelopment of the existing Council at-grade car park opposite Ingleburn Fair.
- The locations of additional shopper and commuter parking need to be investigated and determined.

2. Focus of the draft Plan

Ingleburn has a number of positive attributes which include excellent public transport connections; an established population and town centre; and local industry and employment opportunities. However, there has been a distinct lack of investment by the private sector in Ingleburn over the last decade or so. The draft Plan does not explore in any detail why this has been the case.

A core objective of the Plan should be aimed at revitalising the Ingleburn Centre. The regeneration of Oxford Road, being the heart of Ingleburn, will attract developers and future residents to the area to invest and develop.

How do you revitalise Oxford Road?

Healthy vibrant town centres encourage people and drive new development within an area. The Plan should contain controls that will directly lead to regeneration and revitalisation of Oxford Road, which is Ingleburn's 'front door'. The draft Plan focuses on redevelopment opportunities around the periphery of the town centre with the proposed planning controls essentially retaining the existing built form along Oxford Road.

Revitalisation of a main street is difficult to achieve if there is no incentive to redevelop. Land owners will not spend money updating and constructing new buildings to simply replace like for like.

The draft Plan seeks to reduce the current height limit along Oxford Road from four storeys under Campbelltown (Sustainable City) Development Control Plan (DCP) 2014 down to two storeys. The four storey height limit has been in place for a number of years but has had little impact stimulating redevelopment in the centre. If current height limits haven't resulted in new development, halving this limit will have no effect either. Worse, the properties in Oxford Road will be devalued and developers will seek to invest elsewhere. The existing dated and tired streetscape appearance will be perpetuated. Ingleburn's main street will continue to languish.

The draft Plan proposes planning controls which are not balanced. Despite the periphery of the Ingleburn Centre being identified for higher density, the core of Ingleburn will be sterilised by the proposed restrictive two storey building height. The extra population that would occupy the redeveloped properties surrounding the centre and larger trade catchment will not automatically result in extra investment in the retail core.

Council needs to consider that under the current draft Plan, the appearance of the core of Ingleburn is unlikely to change. Would new residents be drawn to this type of town centre?

The objectives of the draft Plan should be aimed at consolidating and intensifying the town centre to reinforce this area as Ingleburn's meeting place. This should include higher intensity residential uses within the core, mixed with retail and commercial uses that activate the street frontage. This will create a town centre population in the heart of Ingleburn that will act as a catalyst towards achieving Council's vision of a thriving hub of community interaction. It will also assist in the revitalisation of Oxford Road.

The location of 3-4 storey buildings within the outer core (200 metres to 400 metres from Oxford Road) and 6-8 storeys setback around 100 metres from Oxford Road is less likely to result in a

revitalised centre and will do little to promote high pedestrian activity along Oxford Road as envisaged.

Ingleburn includes two anchor stores located within separate shopping centres at the northern and southern peripheries of the CBD. This includes Woolworths located within the Ingleburn Town Centre building and Coles located within Ingleburn Fair. Each of the centres includes other supporting daily convenience shops and cafes.

Residents living within the future higher density areas set well back from Oxford Road are more likely to utilise the closest services to their home. Based on the layout of Ingleburn with these two anchor stores and the proposed location of higher density buildings, the draft Plan if implemented may lead to reduced movement along Oxford Road. The draft Plan could be seen to promote a separation of Ingleburn Centre with pedestrian movements anticipated along the side streets (Norfolk and Cambridge Street) – refer to **Figure 1**.

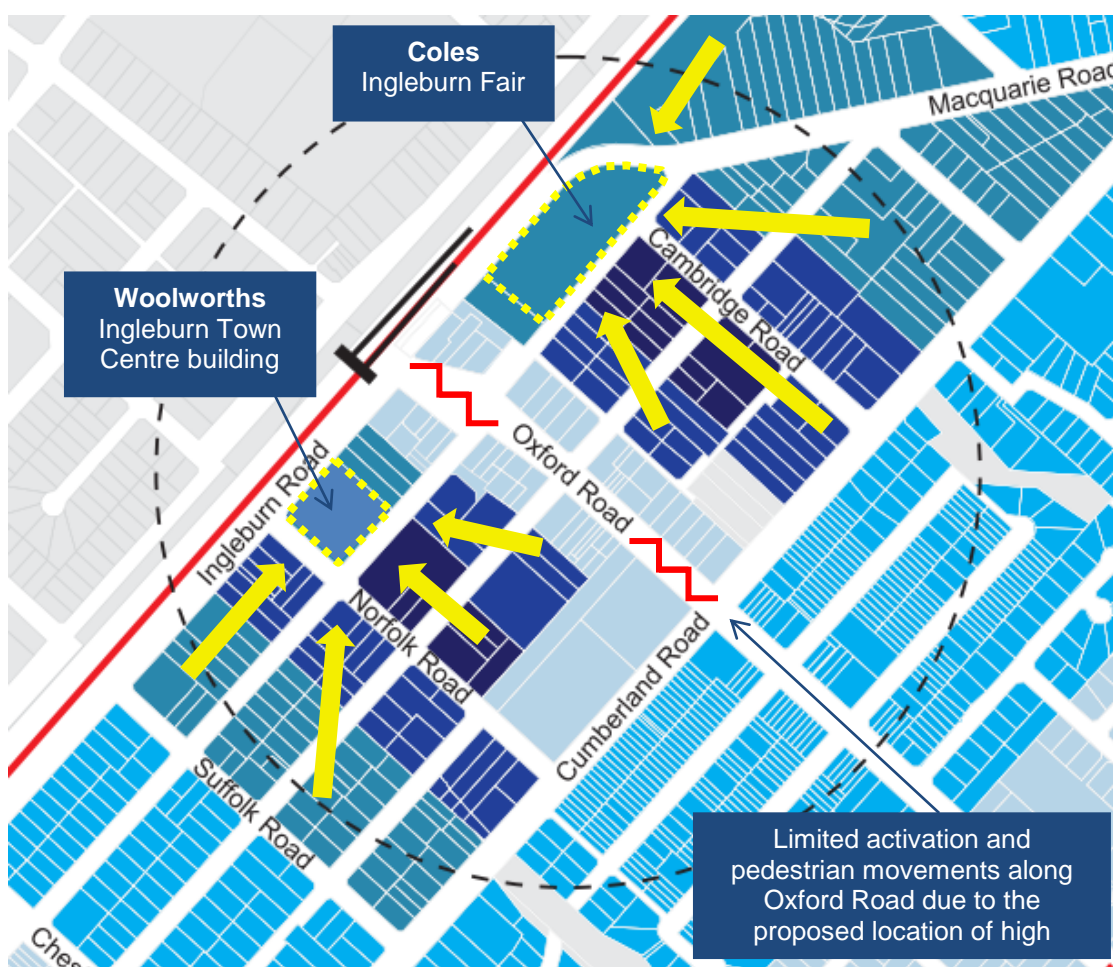


Figure 1 Creation of two separate high density areas away from Oxford Road

The Chamber supports the continued use and development of Ingleburn Town Centre and Ingleburn Fair shopping centres, but this needs to be balanced with policies that support rejuvenation of Oxford Road, the main street that separates them.

The draft Plan needs to be reviewed to better achieve the rejuvenation of Oxford Road and the core of Ingleburn Centre.

How does this Plan support the redevelopment and regeneration of key properties along Oxford Road when land owners are restricted to what exists and is currently built?

Oxford Road is the core of Ingleburn and without appropriate planning controls that encourage, promote and support redevelopment, land owners have limited option but to leave their properties as they are.

There are opportunities for Oxford Road to be redeveloped and rejuvenated. This could be achieved in a sympathetic way to address community concerns while also enabling land owners to reasonably redevelop their properties. This is further discussed in section 2 of this submission.

The halving of current height limits along Oxford Road will significantly devalue property prices along this road restricting any chance of redevelopment. When land owners are not incentivised to inject money into their buildings, the resulting outcome is a tired and dated streetscape that does not promote new business or places that people want to go to.

We recommend that Council:

- **Promote and encourage high intensity residential uses within the core of Ingleburn Centre**

This needs to include Oxford Road. Without redevelopment, why would residents go to Oxford Road to shop with more localised centres in the north and south of Ingleburn that are more practical and accessible?

The current zoning under draft Campbelltown LEP 2014 identifies the town centre as B4 Mixed Use. This zoning is supported as it enables a range of uses to allow Ingleburn Centre to grow and evolve with the changing market.

- **Limit the extent of sprawling density outside of the core Town Centre**

As highlighted by residents, part of the charm to Ingleburn is the low scale development. The proposed higher density living (3-4 storeys) in areas up to 1 kilometre from Ingleburn Centre will only lead to a larger massing to the area which residents are opposed to. Instead, density should be contained within the immediate Ingleburn Centre to create a compact CBD that achieves the aims of the Plan without resulting in wholesale changes to the identity of Ingleburn. Creation of a more compact centre is further discussed in section 3 of this submission.

- **Review how the Plan revitalises Oxford Road**

The revitalisation of Oxford Road should not be considered a by-product of development around the periphery of the Town Centre. Instead the Plan must include specific measures to promote and achieve rejuvenation. A reduction in development potential for properties along Oxford Road will not lead to redevelopment of the current building stock.

3. Achieving a 'village feel'

The draft Plan identifies that, following community consultation, one of the key themes that emerged was that Ingleburn must retain a 'village feel'. The draft Plan makes reference to preserving density and building height along the main community meeting point of Oxford Road as a strategy to retain Ingleburn's village feel.

The key question is – what is a 'village feel' and what role can planning controls play in achieving it?

The draft Plan does not elaborate on what 'village feel' means or how to achieve it, apart from imposing a blanket 2 storey height limit on Oxford Road properties.

If all Oxford Road properties were 2 storeys in height would this mean that the village feel objective was achieved? We do not think so.

A village atmosphere is achieved through the interplay of a variety of elements and is not solely related to density and building height. The characteristics of a village are achieved through:

- High pedestrian activity and interaction of people on the street
- A safe, low speed vehicle environment for pedestrians
- High quality public spaces including street trees, wide footpaths, weather protection elements (awnings), street art, pockets of green space and open squares for people to congregate
- Compactness to enable easily pedestrian movements throughout the village
- Density within in the core of the village to support high pedestrian activity and a compact village design
- A mix of land uses including residential, commercial, retail and community services
- Late night trading to support restaurant and other retail uses to encourage activity in the evening period
- Good links to public transport

Ingleburn already has many of these attributes that give it a village atmosphere. Lacking though is the density of people to create more personal interaction. Through careful planning, Ingleburn Centre could be enhanced while still retaining the village feel and achieving a more sustainable and economically viable density.

A 2 storey building height limit will not see an improved streetscape in Oxford Road because there is no incentive to redevelop. There will also be little scope for after-hours casual surveillance of the street environment, as the upper floor level of a 2 storey structure is more likely to be used for professional offices than residences.

Redevelopment of higher buildings can be accommodated on Oxford Road properties without compromising village feel. The 'feel' pedestrians get of the Ingleburn village is at ground level as they walk through the town centre. The width of Oxford Road in the town centre varies between 30 metres to around 60 metres around the Nardoo Street / Macquarie Road intersection. The generous width of the street and footpaths, which is probably unique among Sydney suburban centres, means that higher buildings at the street interface would not be out-of-scale. The

building interface at street level is important and this can still be of a relatively low scale without compromising the village feel. 2 to 4 storeys is reasonable.

The Oxford Road properties are generally 45 to 50 metres deep. In order to provide redevelopment incentive, 'stepped' buildings up to 6-8 storeys with upper level setbacks from Oxford Road of 10 to 20 metres would reduce the apparent building bulk when viewed from Oxford Road. The crucial element is addressing the visual dominance from what people will see at the ground level. The current four storey height limit along Oxford Road is heading in the right direction to achieve these outcomes, but has so far provided insufficient development incentive.

The Ingleburn Structure Plan should be allowing sensitively-designed higher buildings with stepped profiles along Oxford Road to create the new Ingleburn village.

This density and type of development will provide a necessary injection of investment needed in Ingleburn to revitalise the town centre and build upon the key village components residents currently enjoy.

The current proposal which includes up to 8 storeys setback at least 100 metres from Oxford Road with 2 storeys along Oxford Road will still result in a dominant image of buildings along the sky line. This is evident in the photomontages included in the exhibition documents – refer to **Figure 2**.



Figure 2 Dominant views of high rise along the sky line under draft Plan

A better outcome would be to keep the existing 4 storeys along Oxford Road. This height limit, considering the width of Oxford Road is considered to still achieve the desired character of Ingleburn and screen taller buildings which could be set behind the street frontage.

The Chamber has prepared an image to show an acceptable form of stepped building along Oxford Road – refer **Figure 3**.



Figure 3 Artist impression of stepped 8-level buildings on Oxford Road

Beyond Oxford Road, in areas already identified for higher density development, the Chamber would support a consolidation of density within the town centre to minimise a sprawling of medium densities over a much larger area. Consistent with a more compact centre, sites 100 metres distant from Oxford Road could readily be developed up to 12 storeys without compromising village feel, instead of the 8 storeys currently proposed.

The Chamber thus envisages an Ingleburn Centre with a more compact density profile comprising:

- 2-4 storeys along Oxford Road interface
- Up to 8 storeys between 10-20 metres and 100 metres back from Oxford Road
- Up to 12 storeys between 100 and say 200 metres back from Oxford Road, and along the Ingleburn Road / railway spine
- Stepping down in building heights further away from the centre of activity, with retention of the 2 storey character and very limited development potential in the far northern and southern parts of the Structure Plan area.

The benefits of consolidating the density in this way would be:

- Creation of a compact business centre
- Increased residential density within the town centre supporting retail and commercial uses
- Minimising 'medium density sprawl'
- Preserving periphery sites for future development at a point when higher density is needed and required as part of future growth strategies.

In regard to the last point, the premature development of periphery sites for 3-4 storeys (as proposed in the draft Plan) could sterilise future higher density redevelopment in the long term when it is actually needed. If these sites are developed and strata subdivided, it will be difficult

to redevelop for a higher density if needed in the future and as such should be staged and reviewed at a later date.

By retaining low density development in the periphery, Council would have an opportunity to review these areas in the future to meet necessary housing targets in a location supported by good public transport connections. To redevelop existing low density sites at this stage will unnecessarily limit Council's options in the future to achieving any increased housing targets. Instead a better outcome is considered to be supporting higher densities in a compact centre and reviewing options for redevelopment of the periphery at a later time which may support buildings at or even above 3-4 storeys.



Figure 4 Oxford Road – Ingleburn's 'front door'

Good examples of urban village developments

There are good examples of where a village atmosphere has been achieved through careful design and planning which include building heights above 2 storeys. Many of these areas include residential uses in the core. This provides for a compact town centre with high levels of foot traffic and activity within these centres supported by quality public spaces.

Examples include:

- Rouse Hill
- Italian Forum – Leichhardt

Rouse Hill

The design of this centre provides for a low speed environment, high pedestrian activity, buildings built along the boundary with weather protection elements, a central open square for people to congregate, relatively wide footpaths and a mix of densities within the core of the town centre (refer to **Figure 5 and 6**).

Building heights within the town centre range between 2 - 8 storeys in height. The residential buildings have been orientated towards open public spaces to maximise overlooking for increased public safety and surveillance, particularly to support activity at night.

The buildings have been centralised around a central area that incorporates street furniture, areas for people to interact with and suitable landscaping to soften the appearance of the built form.



Figure 5 Rouse Hill Town Centre



Figure 6 Rouse Hill Town Centre

Italian Forum - Leichhardt

Similar to Rouse Hill, the design of the Italian Forum has been based on incorporating residential living within the town centre. This includes a mix of commercial and residential uses within a building up to 6 storeys in height.

The design of this centre provides for high pedestrian activity, buildings built along the boundary with weather protection elements, a central open square for people to congregate, late night trading and a compact area for people to meander through (refer to **Figure 7**).



Figure 7 Italian Forum – Leichhardt

Both Rouse Hill and the Italian Forum undoubtedly have a village feel. Had these centres been limited to two storeys and the residential flat buildings constructed on adjacent blocks, the atmosphere within these areas and activity associated with this type of design and density is unlikely to be achieved to the level it has been.

4. Retail and commercial uses

Business Park and residential uses on western side

The Chamber is supportive of the proposed Business Park on the western side of Ingleburn Railway Station. This planning strategy will provide more employment and further opportunities for businesses to locate within the Ingleburn area. However, under the draft LEP, the B7 Business Park zone is not proposed to be applied to this area. A review of the potential land use opportunities to ensure there are a wide variety of potential uses to facilitate growth in this area should be undertaken.

The Chamber also supports the proposed high density residential development area on the western side of the railways station. Accommodating more residents in walking distance to transport and amenities Ingleburn Centre makes sense.

Retail floor space

The aims of the draft Plan are underpinned by an objective to provide 25,000 square metres of new retail and commercial floor space within the Ingleburn Centre and its surrounds.

The Plan should be clearer about where the additional 25,000 square metres of retail and commercial floor space will be provided.

While the Chamber supports some retail and commercial uses on the western side of the railway line, consideration should be given to the overall amount. Retail activity should not occur on the western side to the detriment of the economic health of the eastern side. Worse, without good cross-rail links, a competing car-based town centre could emerge on the western side.

Has the amount of retail and commercial floor space to be allowed to be developed on the western side been calculated? If so, is this amount supported by a retail floor space study particularly in a separated location to the town centre?

Council should consider limiting retail floor space on the western side of the railway for the following reasons:

- The retail and commercial role of Ingleburn Centre should be considered in light of new emerging centres to the west at Edmondson Park and Leppington. Suitable opportunity within the town centre should be provided, having appropriate densities, to support a healthy mix of local business. Once these town centres in the Growth Centres are operating, Ingleburn will need to compete for business from residents in the surrounding areas that in the future will have a greater choice in retail shops. With the many new areas developing west of the M5 Motorway, there may in time be a need for some retail on the western side. But to rezone land for these purposes now would be premature and counter-productive to the revitalisation of Ingleburn.
- Permitting large scale retail on the western side will result in spreading the retail uses out. It also runs the real risk of creating two Ingleburn centres and diluting the existing retail offering. This does not fit with the 'village feel' residents want. Instead, retail uses should be consolidated within the eastern town centre to promote high levels of activity within a compact, well defined area.

- The existing Business zoned at-grade car parks in the existing Ingleburn Centre provide most of the development potential needed to support a further 25,000 square metres of retail / commercial space. That is, the case for rezoning more land for retail purposes has not yet been established.
- A retail centre should not be supported on the western side of the railway unless there is direct and convenient pedestrian, cycle and vehicular access across the railway. However, there is currently no program to provide the convenient links. We understand that the current RMS / Council strategy is for a rail crossing linking St Andrews Road to Collins Promenade about 2km to the south of Ingleburn Station. This link, if it is ever created, would be of little benefit in creating a consolidated Ingleburn Centre with eastern and western parts.
- If Council proposes to allow substantial retail and commercial floor space on the western side, a staged release needs to be considered. This is to ensure that the availability of floor space and its uptake can be monitored so that there are limited impacts on the main (eastern) Ingleburn Centre.

Oxford Road east of Cumberland Road

The draft Plan and planning vision for Ingleburn should support the continued operation of the viable fringe commercial uses.

The precinct along Oxford Road and immediately east of Cumberland Road is currently comprised of a number of health and professional services including medical facilities, dentists and alternative health services. These developments are in a gateway location to the town centre, have good transport links and serve a valuable support role for the town centre.

The proposed land use zoning under Council's draft LEP 2014 supports the location of these fringe commercial developments. For example, health consulting rooms will be permitted within this area. An additional use which would further facilitate this cluster of health uses would be to enable 'medical centres' near the intersection of Cumberland Road and Oxford Road. This could be achieved by adding this additional land use within Schedule 1 of the LEP 'Additional permitted uses'.

5. Social infrastructure

Open space

A key component of the draft Plan is identifying opportunities for open space to meet the needs of the anticipated 6,000 new residents.

Open space needs to be accessible to the new residents. Local passive parks containing playgrounds and the like should be in walking distance of the new developments. Active sports and district level recreation facilities that are located to the west, north and north east should have good pedestrian and cycle connections to the town centre.

There is currently a small park in the Ingleburn Centre (Hallina Park) located behind Ingleburn Library. This park has an area of about 4,500 square metres. This park will probably not be sufficient to meet the extra demands of 6,000 people in the new medium to high rise apartments. The nearest other recreational facilities include Memorial Oval on the western side of the railway line and Milton Park to the north of the town centre.

Improvements to the amount, quality and access to open space should be an important consideration within the draft Plan. Options to address the demand necessary to support an increase in approximately 6,000 residents include:

- Improving links to both Memorial Oval and Milton Park. This could be achieved through the provision of bike lanes and widened footpaths to support active modes of transport.
- Identifying land to expand the size of existing parks.
- Augmenting existing parks to facilitate the extra demand.

Connections to link the east and west side of the railway line

Access between the two sides of Ingleburn across the railway line is currently achieved for:

- Pedestrians - by way of an existing footbridge at Ingleburn Railway Station. This pedestrian overpass is in the process of being upgraded to incorporate lifts for improved disabled access; and
- Vehicles - utilising Henderson Road which takes approximately 5 minutes and is a distance of around 3.2 kilometres.

If substantial development is proposed on the western side of Ingleburn Railway Station, improved vehicle access needs to be provided. This access should be to cater for local connections to allow for a better flow of traffic between the two sides of Ingleburn.

This connection could be provided via a small underground tunnel below the railway line to provide local access to better link these areas. Older examples of this type of link are shown in **Figures 8 and 9**. Noting the location of Memorial Oval on the western side of the railway line, a small local connection would assist in providing links to active and passive open space provision to meet the additional population (**Figure 10**).



Figure 8 Example of small railway underpass



Figure 9 Example of small railway underpass

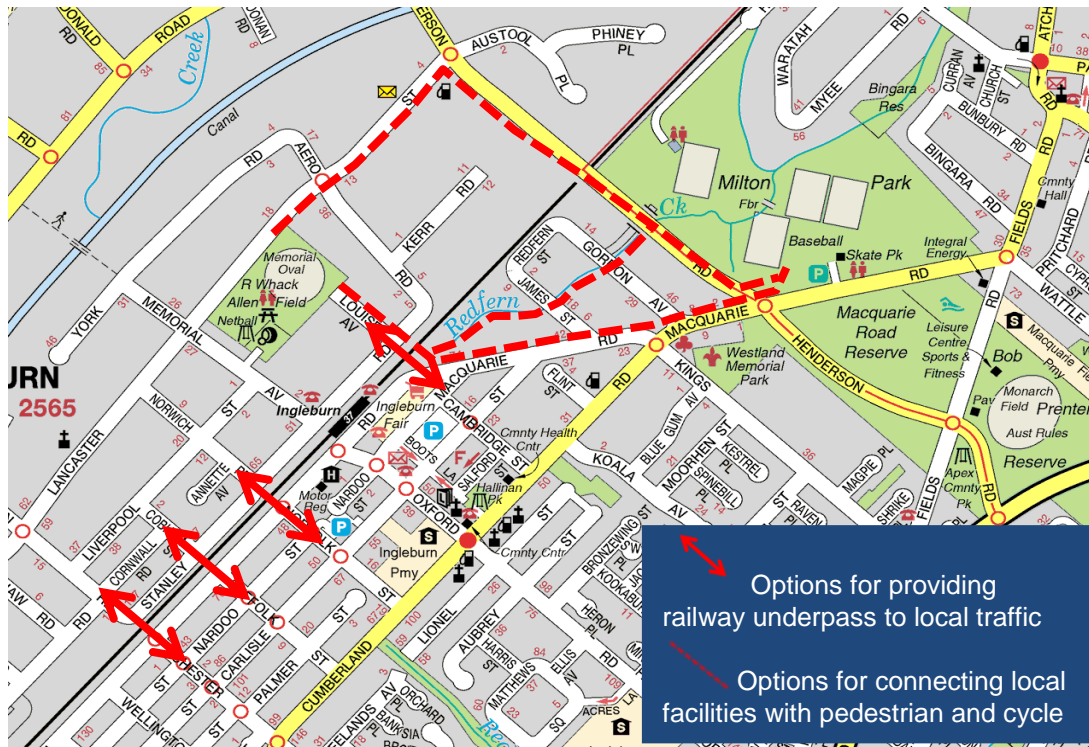


Figure 10 Cross-rail and open space linkage opportunities

The Chamber supports the Structure Plan's philosophy in relation to opening up development on the western side:

Consideration of the future of the industrial area as part of the Ingleburn Urban Village, must be predicated on creating a link which allows for efficient and convenient movement between the two precincts. Without this they will develop in isolation and potentially result in two competing areas to the detriment of each other. (Draft Ingleburn Structure Plan Supporting Document p28)

It is understood that providing a cross-rail link is not straightforward. There is limited space to provide a new bridge, underpass options potentially have drainage implications, and whatever link that is provided should be designed to enable local access only and avoid a new route for heavy vehicles.

Options for the cross-rail connection, and the funding and delivery of the preferred option(s), should be fully investigated as part of the next phase of planning for the Ingleburn Centre.

Connecting Memorial Oval and Milton Park

With planned future development proposed on the western side of Ingleburn Railway Station, Council should incorporate planned improvements and upgrades to better link existing facilities. In particular, consideration should be given towards the need to provide active transport links between Memorial Oval and Milton Park.

This connection to link the two areas could be achieved through the provision of bike lanes and widened footpaths. However early identification of this issue should be flagged in the Structure Plan.

6. Traffic and car parking

The Council car park situated between Macquarie Road and Carlisle Street opposite Ingleburn Fair has an area of approximately 1.2 hectares. This location of this site makes it an ideal property for a mixed use redevelopment and would provide a substantial increase in retail and commercial floor space within the town centre.

This should not occur at the expense of the current convenient shopper parking on this site.

Any redevelopment of this car park land should be contingent upon maintaining the same number of existing spaces on the site, in addition to the parking that would be required for the new development.

The draft Plan does not consider in any depth the issue of all-day commuter parking for the railway station. The next stage of planning for Ingleburn Centre should detail the specific locations that will be developed for commuter and shopper parking.

The draft Plan shows Oxford Road and other streets near the core of the centre as being designated a 'high pedestrian zone'. This is assumed to mean that the streets in the high pedestrian zone will include amenities that support pedestrian use, including wide footpaths, seating, lighting and street trees. The Chamber supports such a scheme, but does not support any proposal that would see vehicle use being blocked off to create pedestrian malls, or any significant loss of on-street car parking in the high pedestrian zone.

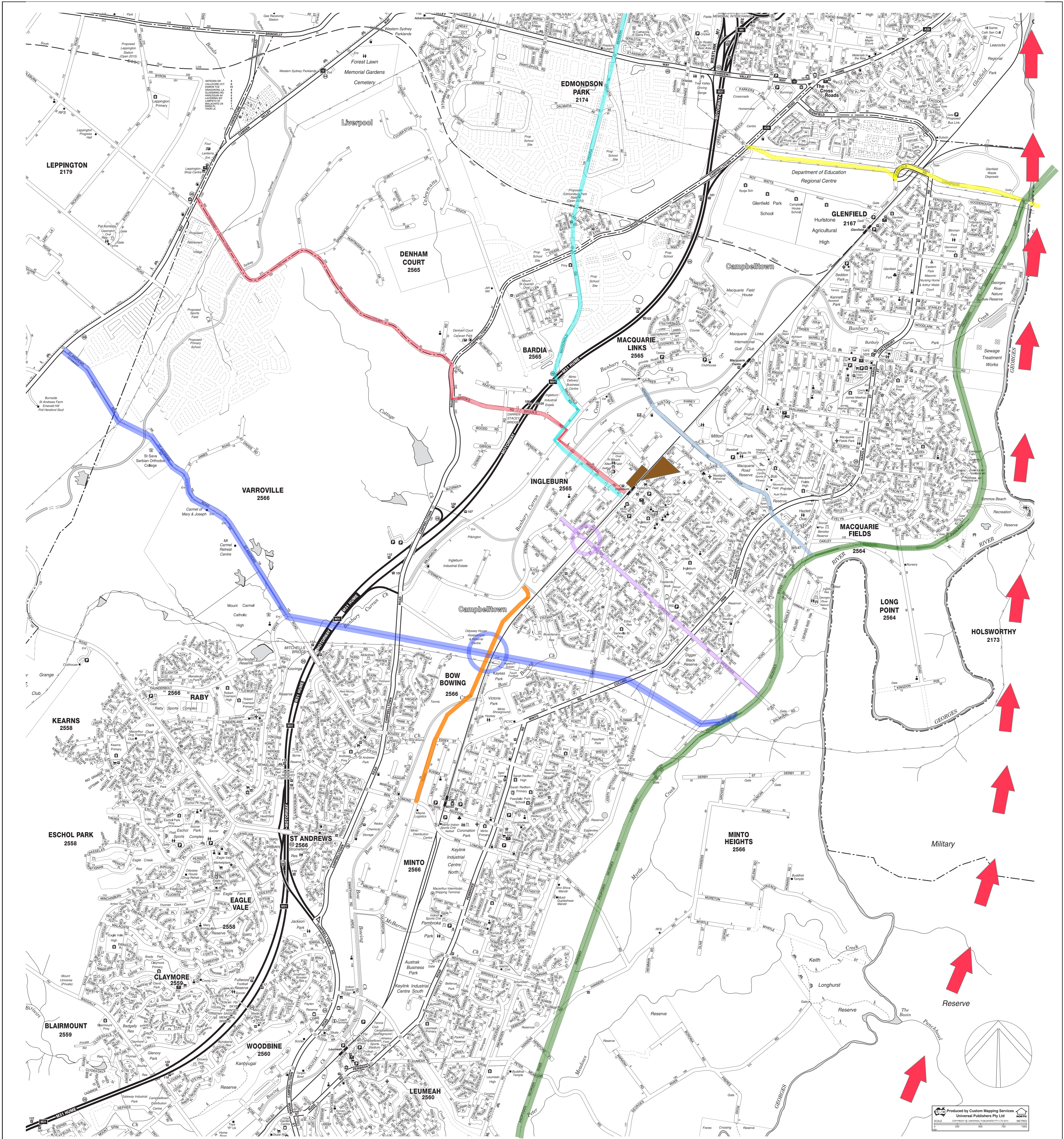
7. Conclusion and recommendations

The Chamber welcomes Council's commitment to making Ingleburn a more attractive and prosperous town centre.

Many of the proposals in the draft Ingleburn Structure Plan are worthy strategies and are supported by the Chamber.

After reviewing the draft Plan we have found the following changes to the Plan are needed, or issues addressed in the next stage of planning, in order for the centre's planning vision to be achieved:

- Oxford Road should be the subject of a detailed planning and design exercise in order to formulate appropriate building controls for private development, and a concept plan that improves the experience for pedestrians in the street environment.
- The blanket 2 storey height limit on Oxford Road properties will not achieve the 'village feel' objective and should be removed. Instead, stepped building height controls allowing viable developments up to 6-8 storeys set back from the road frontage should be allowed.
- The Structure Plan should provide for a more compact centre with higher developments up to 12 storeys in the streets near Oxford Road, and retention of 2 storey height limits in the far northern and southern parts of the plan area.
- Encourage residential uses above ground level within Ingleburn Centre along Oxford Road (i.e. mixed use zoning to support both commercial and residential uses).
- Improve connections across the railway line (east-west) and between Memorial Oval and Milton Park (both vehicle and pedestrian) for local access.
- Determine the preferred location and amount of additional and / or augmented open space that is needed to support the projected future residential population within Ingleburn Centre.
- Include an additional public park 3,000 to 5,000 square metres in size provided in a central location in the town centre. Detailed strategies for improved pedestrian and cycle links to existing open spaces in the area should also be prepared.
- Large scale retail opportunities should not be permitted on the western side of the railway unless there is firm commitment from Council or the State Government to provide suitable cross-rail transport links.
- Ensure that the current amount of public car parking opposite Ingleburn Fair is perpetuated in any redevelopment of the existing Council at-grade car park opposite Ingleburn Fair.
- The locations of additional shopper and commuter parking need to be investigated and determined.



MAJOR NEW BRIDGE OVER RAILWAY LINE TO LINK EAST & WEST SIDES OF BOTH INGLEBURN & MINTO

NEW SOUTH BRIDGE OVER RAILWAY LINE TO LINK EAST & WEST ROADS TO INGLEBURN

LINK LANCASTER ROAD THROUGH CHESTER ROAD TO GEORGES RIVER PARKWAY

MULTI DECK COMMUTER CAR PARK EITHER SIDE OF THE RAILWAY STATION

BUSWAY LINK FROM BERNERA ROAD, CROATIA AVENUE, M^C DONALD ROAD WILLIAMSON ROAD & LANCASTER ROAD TO INGLEBURN STATION

LINKING CAMPBELLTOWN ROAD TO CAMBRIDGE AVENUE

LINKING CAMDEN VALLEY WAY THROUGH TO THE GEORGES RIVER PARKWAY VIA ST ANDREWS ROAD

GEORGES RIVER PARKWAY

LINK MINTO INDUSTRIAL ESTATE FROM BEN LOMOND ROAD TO INGLEBURN INDUSTRIAL ESTATE STENNETT ROAD

DENHAM COURT ROAD & BROOKS ROAD LINKING TO WILLIAMSON ROAD AND LANCASTER ROAD TO INGLEBURN STATION

VERY FAST TRAIN LINK FROM MELBOURNE TO SYDNEY VIA CANBERRA

LINKING HENDERSON ROAD TO THE GEORGES RIVER PARKWAY

Issue	Amendment	Date
A	Planning concept	JAN 2014
B	Notations	MAR 2014
C	Final issue	MAR 2014
D	Updated Final issue	JUNE 2014
E	Updated revision	JULY 2014

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Proposed
Ingleburn Road Strategy Plan

At
INGLEBURN

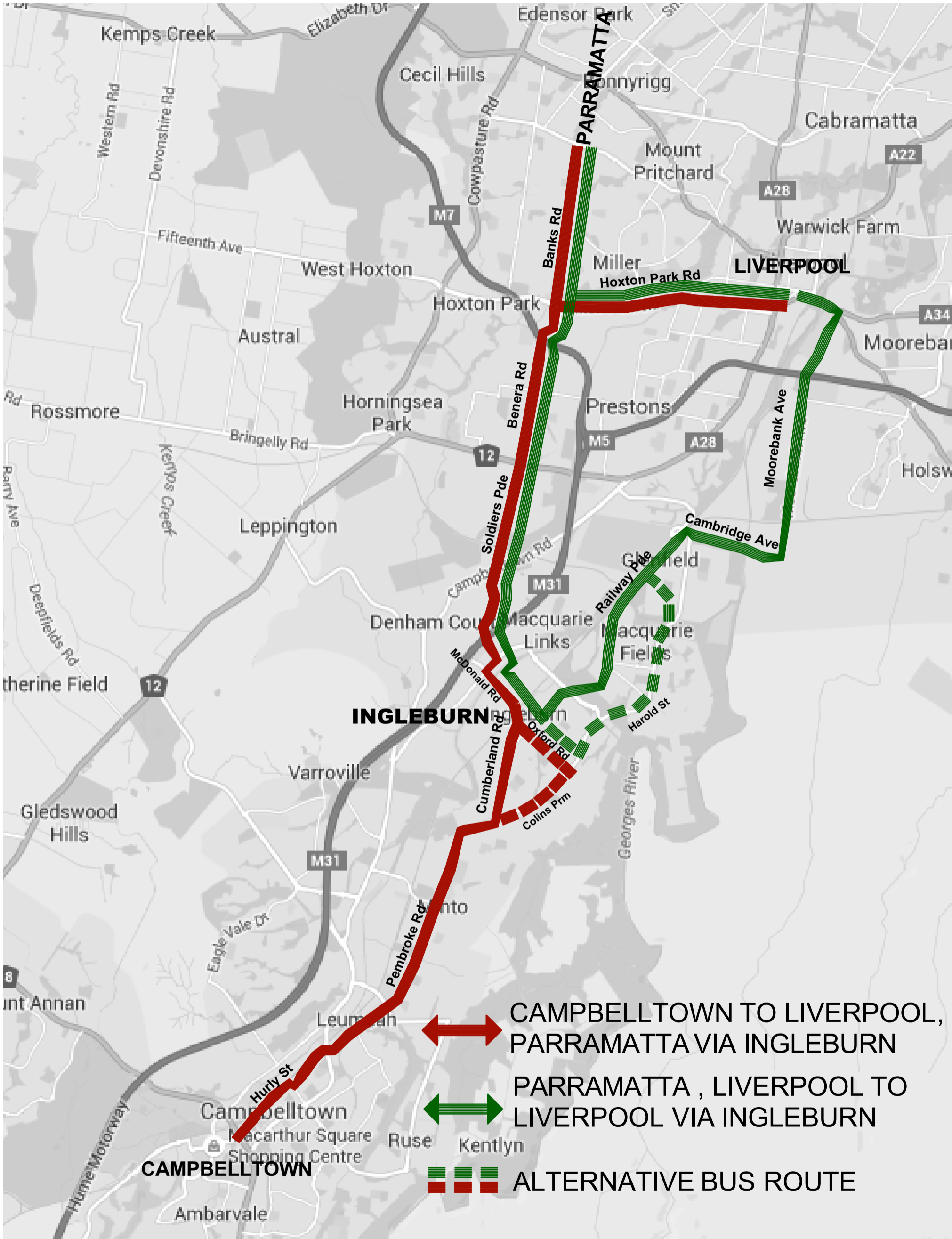
For
Ingleburn Chamber of Commerce & Industry Inc

Plot Date: 2/07/2014

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Title Site Plan

Designed RO	Drawn RO	Checked RO	Job No. E
Date JAN 2014	Scale 1:100.62	Sheet	01-14



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