

# **Submission on GREATER MACARTHUR LAND RELEASE PRELIMINARY STRATEGY + ACTION PLAN**

**Land located at Springs Road, Glenlee  
Part of the Menangle/Mount Gilead Urban Release Area**



**Prepared for Glenlee Consortium**

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## 1 Introduction

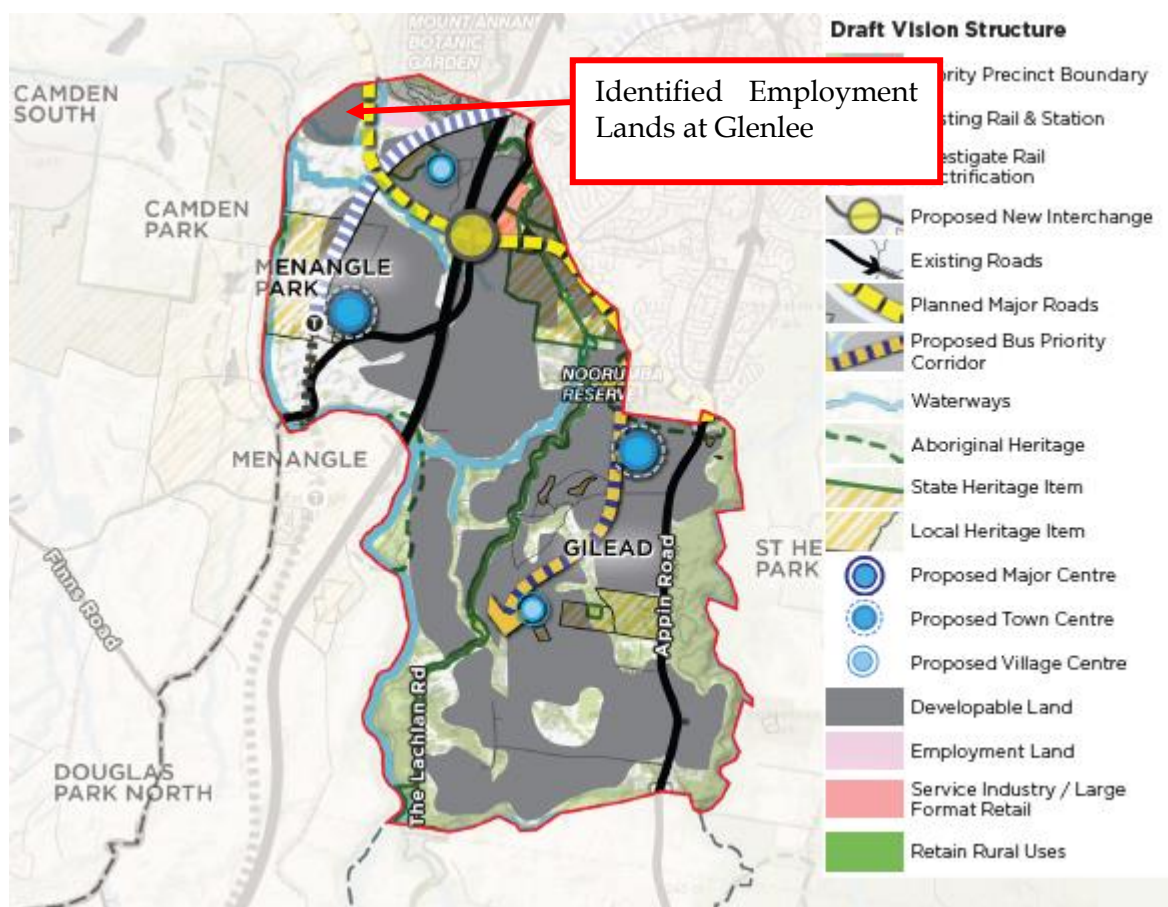
This is a submission to the NSW Department of Planning and Environment in respect of future developable land located in the Menangle Park/Mount Gilead Release Area, referred to as 'Glenlee Employment Precinct' in this submission.

The Glenlee Consortium has formed as a 'group' to lodge a submission to the Greater Macarthur Preliminary Strategy. The Consortium collectively owns several large parcels of land in Springs Road, Glenlee. Part of the 'Consortium's' land holdings has been identified as "Developable Land" on that part of the lands shown in **Figure 1** below. In fact the lands are essentially a "Brownfields" site being used for industrial related uses for some 50 years.

However, they also own contiguous land to the north, which is not included in the Strategy, with part being in the Camden Local Government Area (LGA), with the majority within Campbelltown LGA. All of the land is shown in **Figure 2** below.

Indeed, Camden Council and Campbelltown City Council are currently assessing Planning Proposals to rezone a portion of the Glenlee Precinct from mainly rural zonings to industrial zoning. The Councils have received a Gateway Determination and are currently consulting with relevant State agencies.

**FIGURE 1 – EXTRACT FROM MENANGLE PARK/MOUNT GILEAD PRIORITY PRECINCT  
– FIGURE 2**



The Consortium has concerns over inclusion of the portion of the site (refer to **Figure 1** above) within the Campbelltown LGA and the land being identified as “developable land” rather than “employment land”. This submission recommends that the Glenlee Industrial Planning Proposal site (within both Camden LGA and Campbelltown LGA) be removed from the Menangle Park/Mount Gilead Precinct Mapping to allow for the existing Planning Proposal to be assessed and finalised by Camden and Campbelltown Councils. It is the concern of the Consortium that by being included in the SEPP, this will delay the finalisation of the Planning Proposal to have the lands rezoned for industrial related purposes.

## 2 Brief

The purpose of this submission is to provide the NSW Department of Planning and Environment with feedback on the public exhibition of the *Draft Greater Macarthur Land Release – Preliminary Strategy & Action Plan + Land use and Infrastructure Analysis*. This submission has been prepared in respect of instructions from the Glenlee Consortium.

The submission seeks to have the Glenlee Employment Precinct, shown in **Figure 2** below, excluded from the Greater Macarthur Release Study Area.

**FIGURE 2 – STRUCTURE PLAN**



### 3 Draft Greater Macarthur Land Release

#### 3.1 DRAFT PRELIMINARY STRATEGY & ACTION PLAN + LAND USE AND INFRASTRUCTURE ANALYSIS

In September 2015, NSW Government released the Draft Greater Macarthur Land Release – Preliminary Strategy & Action Plan + Land use and Infrastructure Analysis for public exhibition.

These investigations into the potential of Greater Macarthur identified land that is suitable for urban development, the infrastructure required to support growth, and how Greater Macarthur would be connected to jobs and other services in other parts of metropolitan Sydney.

#### 3.2 PRIORITY GROWTH AREAS

To increase capacity and housing supply, the preliminary strategy identifies immediate opportunities to deliver up to 35,000 homes in Menangle Park / Mount Gilead and in a new town at Wilton.

Maximising these opportunities requires a coordinated approach to land use planning and infrastructure delivery. The preliminary strategy states that the vision for Greater Macarthur is to be implemented by:

- *Identifying Menangle Park, Mount Gilead and Wilton as Priority Growth Areas by including them in the State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (the Growth Centres SEPP);*
- *Investigating declaring Menangle Park, Mount Gilead and Wilton as Special Infrastructure Contribution Areas to coordinate the funding and delivery of infrastructure that is necessary to support growth; and*
- *Continuing to work closely with Wollondilly Shire Council, Campbelltown City Council, and across NSW Government agencies to facilitate outcomes that deliver new communities with homes, jobs, infrastructure and services while protecting the environment and natural resources.*

#### 3.3 MENANGLE PARK AND MOUNT GILEAD

The northern part of Greater Macarthur adjoins the Campbelltown-Macarthur Regional City, and is a logical extension to Sydney's metropolitan urban area.

Land in the precinct is relatively unencumbered by constraints to development and it has less requirements for substantial transport and utilities infrastructure upgrades than other parts of Greater Macarthur, given its proximity to the existing metropolitan urban area.

The precinct has relatively direct access to jobs, health care and education opportunities in Campbelltown- Macarthur, and other opportunities in Western Sydney.

The extent and density of urban development is subject to further detailed transport assessment.

Actions to deliver growth in this area include:

- Upgrade the Hume Highway between Picton Road and Raby Road;
- Rezoning land for 4,900 homes through the Mt Gilead and Menangle Park planning proposals by the end of 2015, with the first new houses possible within two years;

- Upgrades to Appin Road to provide direct connections to Campbelltown-Macarthur;
- Construction of Spring Farm Link Road and new access ramps to the Hume Highway, to help ease congestion on Narellan Road;
- Provision of a north-south bus priority corridor to promote public transport links to Campbelltown- Macarthur;
- Further investigate the extension of the Sydney Trains electrified rail network to Menangle Park to integrate this area with the suburban rail network; and
- Working to release land to provide up to 13,200 homes, in addition to the homes at Mt Gilead and Menangle Park planning proposals.

### 3.4 REZONING PATHWAY

Future rezoning process will test and refine suitable locations for urban development and appropriate densities. Encumbered land (identified as orange in Figure 3) will need to provide evidence that the necessary pathway steps have been undertaken prior to rezoning. This ensures that constraints are managed appropriately and that the land is suitable for urban development. The necessary pathway steps are outlined in the **Rezoning Pathways** section of this report.

#### 3.4.1 KEY REZONING ISSUES

In addition to the general rezoning assessment requirements outlined in the **Delivery Pathway** section, the following key issues are specifically required to be considered in future rezoning processes:

- **Heritage conservation** – the precinct contains a number of heritage items and known Aboriginal sites, some of which are located in or adjoin proposed centres. Further investigation will be required to ensure these items are retained and integrated with future development.
- **Flooding** – the extent of flooding across the precinct, particularly around Menangle Park, will need to be considered with rezoning proposals.
- **Mining** – The southern portion of the precinct has been, and still is being, used for coal mining. For urban development to occur in these areas, proposals will need to demonstrate that they comply with the relevant rezoning pathways steps.
- **Coal seam gas** operations – there are a number of coal seam gas extraction sites within the precinct. Development within close proximity to extraction operations will be required to satisfy relevant rezoning pathways steps.
- **Upper Canal** – the Upper Canal, which provides water to Sydney from the four Upper Nepean dams, crosses the eastern portion of the precinct. Future development in this area will need to ensure this system is not adversely impacted upon.
- A detailed **transport network assessment** is required to confirm the extent and density of urban development.

The Consortium generally does not support the findings and recommendations of the *Draft Greater Macarthur Land Release – Preliminary Strategy & Action Plan*, specifically the inclusion of the Glenlee Precinct as a key part of the proposed Menangle Park & Mount Gilead Release Area.

However, following a review of the Preliminary Strategy & Action Plan and Land use and Infrastructure Analysis, the Consortium is of the view that the lands should be shown within the Strategy as “Employment Land”.

The following provides reasons why the Department of Planning and Environment should amend the documents to exclude these lands within the Growth Centres SEPP 2006, but at the same time acknowledge the lands as ‘employment land’, having regard to the “brownfields” industrial nature of lands and the fact that a Planning Proposal has been lodged with both Camden and Campbelltown Council’s and that a ‘Gateway Determination’ has been issued by the Department of Planning and Environment.

## 4 The Subject Lands

The subject ownership and lands are described as:

Owner	Property Description	Size
Sada Services Pty Limited	Lot 38 DP 1098588	71.04 ha
	Lot 1 DP 250033	3071m <sup>2</sup>
	Lot 1 DP 405624	3.035ha
J & W Tripodi Holdings Pty Ltd	Lot 1102 DP 883495	27.16 ha
Glenlee Properties Pty Ltd	Lot 54 DP 864754	8.836 ha

### 4.1 SURROUNDING USES

The Glenlee Site is some 6 kilometres from Campbelltown and 3.5 and 5 kilometres from Narellan and Camden respectively.

It is situated to the immediate west of the South Western Freeway and Main Southern Railway, southwest of Australian Botanic Gardens (ABG) and to the immediate southeast of the proposed Spring Farm Residential Release Area. Further, it is located south of Mount Annan residential area and the Macarthur Resource Recovery Facility (MRRF) (formerly Jacks Gully), north of the proposed Menangle Park Residential Release Area and north and east of the Nepean River and its expansive flood plain.

Importantly, it displays interfaces and existing and potential functional relationships with these surrounding areas and others. Further, it has an important contextual relationship (including visual) with iconic areas such as Camden Park Estate, Glenlee Estate, Australian Botanic Gardens and the Nepean River.

### 4.2 TOPOGRAPHY

The lands are of variable terrain. It comprises the perimeter of floodplain lands, an elevated plateau of reject emplacement, and two steeper ridges running directly east to the major bend in the Nepean River.

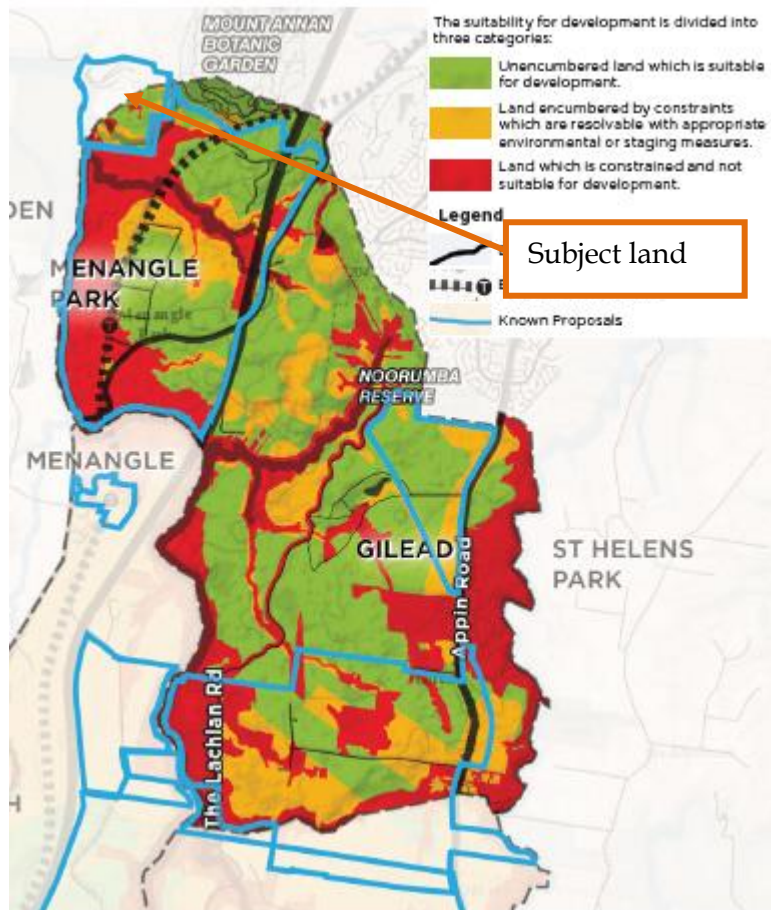
### 4.3 CONSTRAINTS

The constraints map (**Figure 3**), which is an extract from Figure 3, page 5, shows that the land included in the Strategy as developable land; whilst constrained land is not suitable for development.

The land is shown as either “Green – unencumbered land which is suitable for development” or “Yellow – encumbered by constraints which are resolvable with appropriate environmental or staging measures”.

We consider that the inclusion of the subject lands as ‘employment land’ will provide a well located employment area strategically located adjacent to the Menangle Park Release Area and close to transport networks, include heavy rail network, discussed in this report.

**FIGURE 3 – CONSTRAINT MAP**



The desktop based mapping technique is compounded by the chosen legend categories for red and orange mapped lands, which is reproduced above. The identified developable area is shown in ‘grey’ on **Figure 1** above. However, there is a ‘blue’ line around the Glenlee Precinct, which is the subject of the Planning Proposal. It would be noted from the above figures that essentially half the subject lands are included in the SEPP; whilst the remaining lands are excluded. It is our opinion that all of the lands should be excluded from the SEPP for reasons espoused in this submission.

## 5 State Government Policies and Strategies

### 5.1 METROPOLITAN STRATEGY

*“The Metropolitan Strategy seeks to strategically locate employment, ensure good management of existing land resources, ensure there is sufficient supply of suitable commercial sites and employment lands and efficiently utilising existing infrastructure”.*

The Metropolitan Strategy was broadly developed to facilitate and manage growth and development in the Sydney Metropolitan Region in anticipation of an increased population and demographic changes over the next 25 years. The Strategy highlights the importance of increasing the number of jobs located in Western Sydney through the provision of zoned land in western Sydney localities with high quality transport access (including the orbital motorway M4/M5/M7 network) for business, manufacturing, warehousing and transport activities.

It also notes that a predicted increase in Sydney in transport, storage and logistics employment opportunities related to the assembly and distribution of goods, particularly in 'outer areas of the city' will require an anticipated 7,500 hectares of industrial land for these purposes.

Three of the Strategy's five aims designed to create a more sustainable Sydney require the sufficient availability of land for industrial and employment development which is accessible to residential areas.

These aims are:

1. Enhance Liveability – through a range of housing that is close to services.
2. Strengthening economic competitiveness – by increasing the city and region's competitiveness and global markets, leading to benefits spread across the city.
3. Ensure fairness – by providing housing, jobs and services that are close to where people live.

The subject lands could readily be zoned for employment purposes and the creation of more jobs within the local area is consistent with this Policy document.

## **5.2 SOUTH WEST SYDNEY EMPLOYMENT LANDS STRATEGY 2003**

The South-West Sydney Employment Lands Strategy (2003) was prepared by Hill PDA for Camden, Campbelltown and Liverpool Councils to identify, release, rezone and develop employment lands, including the associated infrastructure, in response to the anticipated increase in demand for this type of land over the next 25 years.

The Strategy outlines a number of criteria for the selection and nomination of appropriate employment lands in the Camden, Campbelltown and Liverpool LGAs, including:

- Availability of the land;
- Size of land holdings;
- Physical characteristics (topography, drainage etc.);
- Infrastructure (main roads, location to urban areas etc.);
- Accessibility (to major transport infrastructure);
- Location (including accessibility but also buffering from residential areas); and
- Synergy to other land uses (such as links to a university, hospital or major commercial or recreational uses).

The Strategy notes that an increasing trend is occurring whereby greater flexibility in location choice is required, in part due to organisations requiring larger sites for consolidation of previously fragmented activities. It also notes that purpose-built facilities at well-located nodal points in suburban locations are increasingly sought after by organisations due to their benefits of agglomeration, corporate prestige, amenity, proximity to labour and cost-effectiveness.

The Strategy also noted that decisions relating to future industrial locations could be influenced by factors such as:

- On-going loss of industrial land in inner-middle ring suburbs;
- Recognition of business park development locations by the market;
- Construction of the Western Sydney Orbital route contributing to improved accessibility;
- Potential availability of large sites;
- An apparent trend to leasing land, which may deter operations seeking ownership; and
- There have also been a number of involvements in the area that have been established.

The proposed rezoning of the lands for employment purposes will assist in providing more job opportunities for the local area. This study identified the Glenlee Employment Precinct as an area that was suitable for industrial uses given the strategic nature of the site and having regard to the 'industrial' type uses that were operating on the site.

## **6 The Planning Documents**

### **6.1 PREVAILING PLANNING PROVISIONS**

The principal planning controls are embodied in Camden Local Environmental Plan No. 2010 (CLEP) (as amended) and Campbelltown Interim Development Order No. 15 (as amended) respectively. The majority of the Precinct is within Campbelltown LGA.

CLEP 2010 is the principal local planning instrument controlling development of the urban areas of the Camden LGA. That component of the Precinct which is subject to the provisions of CLEP 2010 is zoned R1U with a 40 hectare requirement in respect of subdivision.

Campbelltown IDO 15 is a rather dated planning instrument covering the bulk of Campbelltown's rural areas. That component of the Precinct which is subject to the provisions of IDO 15 is zoned non-urban, with a 40 hectare minimum area of subdivision. As stated a Gateway Determination has been issued by the Department of Planning and Environment and the rezoning of the lands for industrial purposes is well advanced and is currently with state agencies for consultation.

Both local planning instruments are not geared to facilitate industrial/employment generating development, with many of the current landuse activities expressly prohibited and operating as lawfully established 'existing uses', nor do they facilitate comprehensive industrial development. In both instances they need to be amended to facilitate development of the nature proposed with the Planning Proposal.

## **7 Recommended Amendment**

Having regard to the above commentary, it is considered that all the lands should be included within the 'employment land' category with the potential for the land to be zoned generally as IN1 – General Industrial. However, the key finding of this submission is that all the lands in the proposed Glenlee Employment Precinct as identified by the Lot and Deposited Plan details in Section 4 should be excluded from the SEPP for reasons espoused in this submission.

The above commentary provides a clear case for a review of the documents.