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

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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.

![Ingleburn Commercial Centre](image1)

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.

![Ingleburn Commercial Centre](image)

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 44,000m$^2$ of retail floor area and 135,000m$^2$ 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.
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 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.
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.

![Figure 7 Location of commuter parking within Ingleburn](image)

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.