



Property Council of Australia
ABN 13 00847 4422

Level 1, 11 Barrack Street
Sydney NSW 2000

T. +61 2 9033 1900
E. nsw@propertycouncil.com.au

propertycouncil.com.au
 [@propertycouncil](https://twitter.com/propertycouncil)

Australia's property industry

Creating for Generations

16 February 2021

Mr Adrian Hohensollern
Director Western
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Email – adrian.hohenzollern@planning.nsw.gov.au

Dear Mr Hohenzollern

Draft Glenfield Place Strategy

The Property Council of Australia welcomes the opportunity to provide comments on the draft Glenfield Place Strategy (the strategy).

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes. The following comments are provided for your consideration.

We generally support the vision for the Glenfield Precinct that is set out within the draft Place Strategy and the implementation of the plan through the EIE. We have noted the intention to require a 5% contribution towards affordable rental housing but the proposal does not provide much detail on how that will be implemented. We are concerned that this is being considered for Glenfield without any broader regional consideration of affordable housing needs.

Also the proposed car parking requirements for Glenfield must reflect the precinct's location within South West Sydney where a private motor vehicles are essential for travel across the region. We would support the implementation of a minimum car parking rates within the local environmental plan that provide at least one car space for each apartment.

Should you have any questions regarding the content of this submission, please contact Troy Loveday, NSW Policy Manager, on 0414 265 152 or tloveday@propertycouncil.com.au

Yours sincerely



Jane Fitzgerald
NSW Executive Director
Property Council of Australia

Submission to Department of Planning, Industry and Environment

Draft Glenfield Place Strategy & Glenfield Precinct EIE

16 February 2021

1.0 Introduction

The Property Council welcomes the opportunity to provide comments on the Glenfield Precinct Explanation of Intended Effects (**EIE**) and the Draft Glenfield Place Strategy (**the Strategy**) released in December 2020.

The Glenfield precinct (**the Precinct**) is located within the Greater Macarthur Growth Area which was identified in *Greater Macarthur 2040* announced by the Department of Planning, Industry and Environment (**the Department**) in November 2018. Greater Macarthur Growth Area involves both urban renewal of seven (7) existing centres between Glenfield to Macarthur and new land release areas of Mount Gilead, Menangle Park and Appin.

In 2015, the Department prepared the Draft *Glenfield to Macarthur Urban Renewal Corridor Strategy*. Final plans for six (6) of the precincts were finalised in November 2017. A Section 9.1 Direction issued by the Minister on 22 December 2017 requires a planning proposal to be consistent with the precinct plans approved by the Minister for Planning and published on the Department's website. Campbelltown City Council has commenced detailed planning of several precincts along the corridor.

The Glenfield Precinct Plan was deferred from the precinct planning process pending a decision on the future of the Hurlstone Agricultural High School.

2.0 Draft Place Strategy

2.1 Vision for Glenfield

The draft Place Strategy provides the following vision for Glenfield:

"In 2040, Glenfield will be South West Sydney's premier regional sporting and education destination. Glenfield will be connected, inclusive community, where people come together enjoying parks and playing fields, green cover and abundant open space. Its educational heritage will be protected and enhanced, with existing schools retained, Hurlstone Agricultural High School upgraded, and a potential future primary school built. Revitalised retail and commercial areas will make Glenfield a self-contained new centre that offers jobs closer to home. A variety of housing will meet the community's changing needs, whether people are downsizing or starting a family".

This vision is aspirational and is focused on the Precinct's key attribute's being open space and education. We support the Department's proposed vision for Glenfield.

2.2 Guiding Principles

The draft Place Strategy sets out the seven (7) principles that have been developed to guide the future design and development outcomes across the Precinct. These include:

1. **Respecting Heritage,**
2. **A well-designed place,**
3. **A green place,**
4. **Deliver affordable and diverse housing,**
5. **Two vibrant and connected centres,**
6. **Create opportunities for new jobs, and**
7. **An accessible place.**

These guiding principles are generally appropriate for the transformation of the Precinct into an attractive place where its residents will be happy to live, work and play.

Specifically, we support the special consideration that has been given to enhancing the heritage status of the Hurlstone Agricultural High School precinct and the provision of green space and attractive streets to encourage pedestrian use of the streets and laneways. These urban design principles are supported.

We note the Department's intention to require 5% affordable housing within the Precinct consistent with the Greater Sydney Commission's Western Parkland City District Plan. We have provided specific comments on this issue in our response to the EIE.

2.3 Five Big Moves for Glenfield

The draft Place Strategy identified five big moves for Glenfield, being

1. **A unique educational hub for Western Sydney,**
2. **Improving accessibility and unlocking new open space,**
3. **Linking infrastructure with growth,**
4. **Providing new, affordable and diverse homes and additional jobs, and**
5. **A model that controls development whilst offering design excellence.**

We support the announcement of these transformational changes that will benefit the Glenfield Precinct, which include the following positive outcomes;

- Retention of 77 hectares of the Hurlstone Agricultural High School for agricultural and educational needs.
- A central green spine to protect heritage values,
- At least 30 hectares of additional accessible public open space to be provided;
- New pedestrian and cycle connections across the railway line to link the eastern and western part of the Precinct;
- A potential future health facility to provide jobs and cater for the needs of south-west Sydney;
- Up to 7,000 new homes and 2,900 jobs to be delivered in the study area.
- Traditional development controls – height and floor space ratio to control the extent of development within Glenfield; and
- New design excellence clause to encourage good design and architectural standards.

The proposed transformation of Glenfield outlined within the draft Place Strategy is supported. As the Precinct is developed over the life of the Strategy, there will be increasing demand for infrastructure and services. The Precinct was identified for a Special Infrastructure Contribution (SIC) in November 2018 along with the other precincts along the Glenfield to Macarthur Corridor. At the time there was no detail provided regarding the amount or timing of the SIC. It is noted that the EIE has proposed the use of a 'satisfactory arrangements' clause to fund regional infrastructure. We have provided detailed comments regarding the use of clause for infrastructure funding.

2.4 Character Areas

The draft Place Strategy includes five (5) character areas that apply to the land in the western half of the Precinct. The character areas "reflect its unique response to site-specific constraints and values". The Station and Town Centre character areas are close to the railway station and provide a mix of commercial and residential land uses. The north-west, south-west and southern character areas being predominantly areas for new housing.

The descriptions and criteria that have been developed for each character area are clear and concise and should assist towards the implementation of the vision for the Glenfield Precinct.

It is not clear from the draft Place Strategy whether these character areas will be given statutory weight within the CLEP 2015 (aligned with the current local character provision EIE that was recently exhibited) or these statements will form part of the Council's development control plan. It is important that the Department clarify the status of the five new character areas and how they will be applied.

2.5 Implementation

We support the implementation of the draft Place Strategy through the EIE that has been released for consultation concurrently.

3.0 Explanation of Intended Effects

3.1 Context

The EIE sets out new planning controls that will apply to land within the Precinct that will be incorporated into *Campbelltown Local Environmental Plan 2015 (CLEP 2015)*. We acknowledge that the proposed zoning of East Glenfield will build upon the *Glenfield to Macarthur Urban Renewal Corridor Strategy* and the draft *Glenfield Precinct Plan* prepared in 2015. The completion of this strategic planning work is welcomed.

3.2 Land Zoning

The EIE is proposing to rezone the eastern half of the Precinct to provide for the establishment of a new town centre (B4 Mixed Use) that will be surrounded by high and medium density residential housing (R3 Medium Density and R4 High Density Residential). Buildings in this area will range in height from 12 storeys down to 3 storeys. Floor space ratios commensurate with the anticipated development (between 1:1 and 4:1) are proposed. These development controls are appropriate in recognition of its proximity to public transport and other amenities. We support these changes.

The western half of the Precinct involves reconfiguration of the existing Hurlstone Agricultural High School campus. A new town centre has been identified on land close to Glenfield railway station. We support these changes and the benefits they will bring to the region. The plan proposes a B3 Commercial Core near the train station and a B4 Mixed Use zone south of the high school. Both involve appropriate building heights and densities. A mix of high, medium and low-density residential housing is proposed surrounding the school campus.

3.3 Car Parking

The EIE indicates that car parking rates for the town centre are being explored to achieve a balance between excess and adequate parking. It is important to recognise the town centre is located in Greater Western Sydney where the rates of car ownership tend to be higher due to a long history of poor public transport services.

In recognition of the Precinct's proximity to frequent and fast public transport services, we support car parking rates being limited by a maximum rate but would not support an under supply of car parking. For the residential component of a development, every apartment should be provided with a minimum of one (1) off-street carparking space. Larger apartments should be allocated with additional parking spaces.

The car parking rates proposed for commercial and retail uses in the Precinct are appropriate.

3.4 Affordable Housing

The EIE proposes the introduction of inclusionary zoning to provide for affordable housing within the Precinct. It is intended that a clause will be added to CLEP 2015 that will require residential development to contribute to the provision of affordable housing. A contribution rate of 5% of new additional gross floor area will apply to the majority of the Precinct.

The Property Council supports the sensible implementation of the affordable rental housing targets (between 5% and 10% of new floor space) identified in the Greater Sydney Commission's District Plans. To date there has been no plan prepared for the implementation of these targets.

State Environmental Planning Policy No 70 – Affordable Housing (Revised Schemes) does apply to the land within the study area however, Campbelltown City Council has not developed

a scheme for land within the LGA. In the absence of a whole of LGA or District-wide scheme for affordable rental housing, we do not support the proposal to levy contributions solely for the Glenfield Precinct.

We note that the EIE indicates that the final affordable housing rate and how rate is implemented will be subject to further investigation.

3.5 Housekeeping Amendments

The EIE indicates that the South West Growth Area application map will be amended so that the study area land will be removed from within the boundaries of this area. It is noted that the only part of the Precinct located within the South West Growth Area is the route of the corridor containing the South West railway line.

This change is supported.

3.6 Cumberland Plain Conservation Plan

The EIE indicates that parts of the study area are subject to the draft *Cumberland Plain Conservation Plan* (CPCP) and the proposed amendment does not seek to amend the CPCP but ensures that the commitments and controls outlined in the CPCP remain.

We have noted the extent of the CPCP within the Campbelltown LGA which includes the Glenfield to Macarthur urban renewal corridor as well as other parts of the Greater Macarthur Growth Area and the Wilton Growth Area. Strategic biodiversity certification of new development within these areas is supported.

It is unclear from the information provided within the EIE what full implementation of the CPCP will have on new development within the Precinct. Given that a significant part of the Precinct has been used for urban purposes for many decades, very little natural biodiversity remains within the Precinct. The Department should disclose if it intends to levy a biodiversity component in any future SIC or through the implementation of the 'satisfactory arrangements' clause.

3.7 Infrastructure Delivery

The EIE indicates that there will be a range of potential infrastructure items (open space, upgrading local roads and social infrastructure) to support the growth of the Precinct. A range of mechanisms are proposed to fund the delivery of infrastructure within the Glenfield Precinct including local contributions to Campbelltown City Council (under section 7.11 or 7.12 of the Environmental Planning and Assessment Act 1979) and the use of Voluntary Planning Agreements, where appropriate.

We support the use of these mechanisms provided contribution rates are reasonable and do not impact upon the viability of development. In this respect, the findings of the Productivity Commission's Review of Infrastructure Contributions will be relevant and must be considered as part of developing contributions plans.

The Department is proposing to use a 'satisfactory arrangements' clause as part of the rezoning to collect funds for certain designated State Public Infrastructure. This clause type of clause is applied in many cases during the plan making process and is regularly associated with "intensive urban development".

Unlike the Special Infrastructure Contribution (SIC) process that is transparent and subject to a public consultation process, the use of a 'satisfactory arrangements' clause does not allow for a proper review of a proposed contribution and consideration of its impact on development feasibility. Given there has been an extensive review of Infrastructure Contributions in NSW undertaken by the NSW Productivity Commission, we recommend that this provision be delayed which will allow for a proper consideration of the findings of this review.

4.0 Conclusion

The Property Council welcomes the opportunity to provide feedback to the Department on the proposed Glenfield draft Place Strategy and the associated EIE.

In summary, the proposal to allow for the renewal of the Glenfield precinct is generally supported as it will allow for the long-term renewal of the precinct close to a frequent public transport service. Our primary concerns with the specific proposal are related to the imposition to a 5% affordable housing contribution, particularly in the absence of detail of how it will be implemented. We also are concerned about the proposed car parking rates that may involve apartments being developed without carparking being allocated to each apartment.

We would welcome the opportunity to discuss our concerns with these matters with the Department in detail following the conclusion of the exhibition period.