

15 March 2021

Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Thomas Holmes

Email: [REDACTED]

Dear Mr Holmes,

RE: Submission: Glenfield Place Strategy and Cambridge Avenue Upgrade

Thank you for the opportunity to comment on the proposed Glenfield Place Strategy that was exhibited concurrent with the Cambridge Avenue upgrade.

Further to Council's letter dated 19 February 2021, the submission was endorsed at the Ordinary Council Meeting on 9 March 2021. Please find enclosed copy of Council report and resolution.

Should you require any further information please contact me on (02) 4645 4305.

Yours sincerely,



Fletcher Rayner
Executive Manager
Urban Release and Engagement

8.4 Glenfield Place Strategy Submission

Reporting Officer

Executive Manager Urban Release and Engagement
City Development

Community Strategic Plan

Objective	Strategy
1 Outcome One: A Vibrant, Liveable City	1.1 - Provide opportunities for our community to be engaged in decision making processes and to access information

Officer's Recommendation

That Council endorse a formal submission to the NSW Department of Planning, Industry and Environment and Transport for NSW on the draft Glenfield Place Strategy and Cambridge Avenue Upgrade with matters contained in this report.

Executive Summary

- The NSW Department of Planning, Industry and Environment and Transport for NSW have jointly exhibited a draft Glenfield Place Strategy and Cambridge Avenue, Options Evaluation Report for public submissions.
- The draft Glenfield Place Strategy (the draft Strategy) proposes amendments to the Campbelltown Local Environmental Plan 2015 that would support future development of approximately 7,000 dwellings over the next 30 years. This would be supported by a future upgrade of Cambridge Avenue by TfNSW that involves duplication and extension of Cambridge Avenue westward from Moorebank Avenue to Campbelltown Road.
- Key concerns generally relate to the reliance on Roy Watts Road for the majority of traffic movements within the western precinct, which would be compounded by school access and commuters. This would partly be resolved via the provision of a future intersection on Cambridge Avenue that provides for all turn movements.
- In relation to open space acquisition, the proposal to nominate Council as the future acquisition authority of five privately owned lots is not supported. Alternate arrangements are capable of being progressed that would address the place making and local open space needs of the future community.
- Although the retention of lands for the future agriculture needs of the Hurlstone Agricultural High School is not ideal for place making, the proposed structure plan and supporting controls are generally supported. It is recommended that Council endorse the making of a submission that addresses key issues that would support the successful delivery of the plan.

Purpose

On 9 December 2020, DPIE and Transport for NSW released the draft Glenfield Place Strategy, Explanation of Intended Effect (EIE) and Cambridge Avenue upgrade, Options Evaluation Report for public comment. The purpose of this report is to identify key issues for the making of a submission.

Draft Glenfield Place Strategy Overview

The exhibited draft Glenfield Place Strategy (draft Strategy) reflects the NSW Government's decision to retain Hurlstone Agricultural High School at its current location. This would ensure the future agricultural education requirements of the school and educational needs more generally are maintained.

The draft Strategy is supported by a structure plan, urban design report, development principles, supporting technical studies and proposed amendments to landuse zones, building heights and other supporting development controls.

The proposed structure plan focuses primarily on the Hurlstone land holdings on the western side of the Glenfield Train Station (the Station). The eastern precinct is bound by Railway Parade, Fawcett Street and Canterbury Road.

Key features of the strategy include:

- Approximately 50 ha of land retained for Hurlstone Agricultural High School's agricultural education purposes
- Up to 6 new playing fields, including 30 ha of accessible open space
- Provision for up to 4,000 dwellings within the western precinct and up to 3,000 dwellings within the eastern precinct
- A plan for green links connecting open spaces, parks and plazas
- A new town centre with heights up to 12 storeys
- Identification of sites for new health and community facilities
- Shared streets which prioritise pedestrian movement and active transport and
- Improved cycleway connections and upgrades to regional active transport links
- Guiding design principles that include:
 - celebrating heritage
 - a well-designed place
 - a green place
 - delivery of affordable and diverse housing

- two vibrant and connected centres
- creation of new job opportunities
- an accessible place

The vision for Glenfield as outlined in the draft Strategy is:

"In 2040 Glenfield will be South West Sydney's premier regional sporting and education destination. Glenfield will be a 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."

The strategy would be implemented via the following moves:

- remove Glenfield from the SEPP (Sydney Growth Centres) 2006 to support a change in Biodiversity Certification to be replaced by the proposed Cumberland Plain Conservation Plan
- insert or amend land use zones, development standards, local provisions and heritage controls into the Campbelltown Local Environmental Plan 2015 (CLEP 2015)
- infrastructure would be delivered via amendment to Councils Development Contributions Plan 2018, Special Infrastructure Contributions and Voluntary Planning Agreements

Council would also be responsible for undertaking future amendments to its development control plan to identify any site specific controls to support the future assessment and determination of development applications.

Cambridge Avenue Upgrade Overview

Transport for NSW has identified a recommended design to link Moorebank Logistics Park and the Hume Motorway to improve access.

The recommended design would involve duplication and extension of Cambridge Avenue westward from Moorebank Avenue to Campbelltown Road including:

- four lanes between Moorebank Logistics Park and Canterbury Road
- extending of Cambridge Avenue as a dual-carriageway with provision for up to 6 lanes between Glenfield Road and Campbelltown Road
- an improved M31 Hume Motorway and Campbelltown Road interchange access which would enable motorists travelling:
 - north on the Hume Motorway to exit to Campbelltown Road

- on Campbelltown Road to join the M31 Hume Motorway to take either M5 eastbound or M7 northbound
- south on the M7 Motorway to exit to Campbelltown Road.
- Campbelltown Road would also be upgraded between Ingleburn Gardens Drive and Parkers Farm Place.
- new bridge over the Main South and East Hills rail lines and the Southern Sydney Freight Line at Glenfield
- new bridge over Georges River with flood immunity for 1 in 100 year flood
- new bridge over the East Hills Rail Line at Moorebank
- new bridge over the Hume Motorway on Campbelltown Road.

The project would require acquisition of some properties that would be the responsibility of Transport for NSW.

Report

This report addresses key issues and recommended responses that represent Council's formal submission.

1. Statutory Planning Issues

a) Minimum Lot Size

Concern is raised with the minimum lot size of land in proximity of the Macquarie Fields House. The suggested minimum lot size of 1,200 m² is considered too small to achieve generous landscape setting. A more appropriate minimum lot size would be between 2,000 m² and 4,000 m².

The sensitivity of the locality surrounding and close to Macquarie Fields House is evidenced by way of the most recent refusal by the Council in May 2017, of a Concept Masterplan for the residential subdivision of Macquarie Fields House, which proposed a low density development with lot sizes ranging from approximately 1000 m² to 5500 m². The majority of lot sizes ranged between 1000 m² and 2500 m² with the refusal in large part being based on on-site environmental heritage impacts and the adverse impact on views and vistas to and from Macquarie Fields House as a result of the development of the land.

The proposed minimum lot size of 180 m² for designated precincts within the western precinct is not consistent with recently supported minimums for Menangle Park or Mt Gilead. A minimum of 250 m² is considered more appropriate, particularly as Torrens subdivision of this product can result in complying development on lots of 200 m² or more that may not comply with building envelope plans determined as suitable at the subdivision stage. Larger allotments provide for greater design flexibility that is more suitable in circumstances where merit based assessment, via the development application process, is not followed.

Recommendation: That the minimum lot size for Torrens subdivision of residential dwellings is not less than 250 m².

b) Car Parking

Two options for car parking are outlined in the draft Strategy that seek to balance the need for access to and provision of adequate parking. Option one seeks to apply a maximum rate approach, whereas option two would apply a more conventional minimum rate approach.

Concern is raised that option one would result in future development that does not provide sufficient off-street parking and result in future occupants competing with rail and school users for on-street parking. This may limit development feasibility or the ability to attract commercial and retail tenants who rely on sufficient off-street parking. This is particularly relevant, as the Edmondson Park Town Centre, located only one stop away, has more generous parking rates.

Recommendation: That car parking be based on a minimum rate of provision to be more in keeping with nearby centres and to ensure that development is capable of providing its own off-street parking. Development standards for car parking should only be contained within a development control plan to reduce the need for applicants undertake a Clause 4.6 where variations are proposed.

c) Public Open Space Acquisition

The plan proposes the acquisition of 5 private allotments, of which the acquisition authority is shown as Council. Property Nos. 12 – 16 Hosking Crescent are proposed for public open space and Nos. 108 to 110 Railway Parade are proposed for a town square.

Council understands the selection principles for these allotments are based on the NSW Government Architect's draft publication titled 'Greener Places Design Guide' which is a design policy for green infrastructure in urban areas throughout NSW. The draft policy identifies a preference for local parks to be accessible within 200 m of high density development.

Concern is raised that sufficient public open space is generally available within a 200 to 400 metres of these lands and that the rate of existing provision exceeds the generally accepted standard of 2.83 ha of open space per 1,000 residents. Of this, approximately 1.46 ha per 1,000 residents would be reserved for passive open space.

Council's records indicate that Glenfield Park is approximately 5 ha and Seddon Park is 11 ha and are both within 200 to 400 metres of most future residents in the eastern precinct. Therefore, based on more conservative development yield of 2,500 dwellings for the eastern precinct, 7.3 ha of local open space would be required. This provision could be met within these existing reserves, with upgrades to improve their amenity which would be a more efficient use of development contributions.

In relation to Nos. 108 – 110 Railway Parade, a parking reserve of equivalent size exists behind this land under the control of Council. A better solution to the provision of an iconic, corner square would be to negotiate a land swap upon the lodgement of a future development application. This would forego the need for Council to acquire the land and provide an incentive for future developers to incorporate the properties into a development site.

Recommendation: That the reservation of property Nos. 12 – 16 Hosking Crescent and Nos. 108 to 110 Railway Parade for acquisition by Council is not supported.

d) Biodiversity

The western precinct has existing biodiversity value by virtue of its remnant habitat and riparian aligned vegetation.

The supporting Biodiversity Assessment was undertaken in 2016 and does not address more recent changes in legislation (including the offset provisions) threatened species listings, survey methodology and biodiversity policy development.

Although future development would be reliant on the Cumberland Plain Conservation Plan (CPCP) which is yet to be finalised, the Structure Plan should be capable of assessment against the current biodiversity framework. Particularly if development applications for subdivision are lodged shortly after making of the required amendments to the CLEP 2015.

Recommendation: That the Draft Place Strategy only be finalised if supported by the prior commencement of the Cumberland Plain Conservation Plan.

2. Draft Structure Plan Issues

a) Hume Motorway Interface

The western boundary of the Glenfield precinct directly interfaces with the Hume Motorway (and Campbelltown Road in part). The visual and acoustic impact of residential development on this sensitive interface is of high importance, particularly given that not all land is screened by the landscape mound and any residential development in proximity to a major roadway will be affected to varying levels at day and night by noise generated by vehicles moving along the motorway.

Recommendation: Future development should be responsible for the extension/augmentation of the existing landscape mound to provide a complete, naturalised screen from the highway. All dwellings in proximity to the major roads such as the motorway and Cambridge Avenue, should include adequate noise reductions within their building specifications. These aspects should form part of the structure plan to support future translation into a development control.

b) Heritage and Visual Landscape

The design of the western precinct is significantly influenced by the heritage sensitivities associated with Macquarie Fields House and its visual context and Hurlstone precinct generally.

The Heritage Assessment predates the exhibited structure plan which should be updated to address the following:

- Whether the amended structure plan sufficiently addresses the retention of the key views
- Whether the low density development to the northeast of Macquarie Fields House is appropriate; and
- Whether medium density residential development to the west of the proposed playing fields is likely to impact on view corridors associated with Macquarie Fields House.

Recommendation: An update of the supporting Heritage Assessment be undertaken to ensure its recommendations are reflected in the final structure plan, including illustration of the view corridors on the final structure plan.

c) Sports fields

The development of Glenfield 'as a premier regional sporting' locality is largely encapsulated in the proposed formal playing fields situated in the central open space corridor on the west. The precinct is depicted in the structure plan to be 'tightly' bounded by urban development and the school farm land.

This configuration provides little scope for amenities and parking requirements to service a precinct of such scale. Additionally, provision should be made to ensure that the facility caters for both junior and senior sport spatial demands and appropriate buffers to surrounding sensitive urban uses.

Recommendation: The draft structure plan be reviewed to ensure that it caters for both junior and senior sporting demands, required parking and amenities infrastructure whilst also incorporating appropriate buffers to surrounding sensitive urban uses. If required, a sporting field should be removed in favour of utilising the same land for passive uses or greater curtilage.

d) Health and Community Facilities

The draft structure plan locates the potential future health and community facilities approximately one kilometre from the Glenfield Railway Station, on the fringe of the western town centre precinct. The proposed facilities may also include a library and cultural space, which would have an important place making role.

Concern is raised that this facility should be located closer to the mixed use town centre hub and train station. This would enhance the place making role of the facility and optimise opportunity for patrons to access the facility by public transport.

Recommendation: The structure plan be reviewed to consider relocating the future health and community facilities to be closer to the walkable catchment of the train station precinct.

e) Accessibility

Glenfield is strategically located at the northern extremity of the Campbelltown Local Government Area and forms an important heavy rail dominated public transport node.

The Glenfield rail radiates to Leppington to the west, to Airport and the city to the east and Liverpool, Parramatta and the city to the north. This rail node is a critical foundation for the Structure Plan.

Despite the presence of the rail, the structure plan is not underpinned by an integrated public transport strategy, nor is there a bus interchange facility plan.

Recommendation: That an integrated public transport strategy and bus interchange solution be urgently advanced.

f) Integration with Glenfield Road Urban Release Area

The existing Glenfield Road Urban Release Area (GRURA) to the north remains a 'free-standing' disconnected community. Although land use provision was made for a mid-block connection to the Hurlstone site, the retention of agricultural land for the school now removes this opportunity.

Access for the GRURA community to the Glenfield railway station via pedestrian and cycleways should be fully integrated into future works.

Recommendation: Access for the GRURA community to the Glenfield railway station via pedestrian and cycleways should be fully integrated into future works associated with Cambridge Avenue upgrade.

g) Water Management

The detention basin in the north western corner adjacent to the intersection of Campbelltown Road and Cambridge Avenue is not shown. There is also no assessment of the land area requirement for water quality treatments which should occur before zoning is finalised, as this may require additional land.

The detention basin to the south west of Glenfield Park School is slightly south of the natural low point and careful integration of the topography would be required to ensure the properties to the north are not affected by flooding.

Recommendation: Relocate the proposed basin that is south-west of Glenfield Park School to the natural low point. An assessment of the land area requirement for water quality treatment should also be undertaken before finalising the plan.

h) Western Town Square

The location of the urban square in the western town centre should be located closer to the centre of the precinct and be of a more adequate size. It is considered more appropriate for the urban square to be located more centrally to the town centre rather than the edge to enhance commercial place making opportunity. The proposed location does not align well with access from the train station or any other attractor.

Recommendation: Locate the western town square to more central location or move further south to align with the active transport link and review the required land areas to optimise place making opportunity.

i) Footpaths

The provision of 1.8m wide footpaths to facilitate active transport is not supported. Consideration should be given to two-way share paths of 2.5 m wide on one side and 1.5 m wide pedestrian only paths on the other side. This would also need a corresponding update to street widths to allow for a suitable tree planting allocation.

Recommendation: The width of active transport links and provision and allocation for tree planting be reviewed in consultation with Council.

3. Transport Planning Issues

a) Roy Watts Road

The section of Roy Watts Road parallel to the rail corridor is currently shown as being owned by Railcorp and this road does not become a public road, until it reaches the roundabout at Glenfield Road. Council or any private developer should not be responsible for resolving acquisition of this road for a public purpose.

Recommendation: The sections of Roy Watts Road owned by Railcorp should be excised by the State and dedicated as public road prior to finalising the plan to ensure access to the precinct can be secured.

b) Access to Western Precinct from Cambridge Avenue

The proposed Cambridge Avenue upgrade provides limited access to the proposed western urban release area. This means that all traffic wanting to head east will need to use Roy Watts Road. Similarly there is no right turn into the development from the western access road, so all trips from this direction will need to access via Roy Watts Road.

Roy Watts Road will be required to support a significant level of local development and trip demand, include vehicle trips that don't want to be on this side of the development.

Recommendation: It is strongly recommended that both access roads be designed to split traffic demand and make some provision in the situation where there is an incident that requires traffic to divert. All turn movements into/and from the western precinct must be provided from the mid-block intersection on Cambridge Avenue.

c) Future Transport Facility

The site nominated as a proposed future transport facility is an existing facility and fully patronised.

Recommendation: Additional provision of a similar commuter parking facility, supported by a parking strategy be provided.

d) Pedestrian priority

The station character area talks of prioritising pedestrian and cycle movements over vehicles. Given the concentration of development on this side of the precinct and the need for road access via Roy Watts Road (which is the only link on this side of the precinct to the main road network outside the precinct), it will be important to separate vehicles and pedestrians.

Recommendation: That an extension of the existing overpass from the station to the western side of Roy Watts Road be identified as state infrastructure.

e) School and commuter car parking

Concern is raised that proposed routes to the school and associated parking/waiting requirements have not been properly considered due to competing demand for on street parking from adjoining railway and future higher density development. This should also include movements around the existing multi-deck carpark.

It may be necessary to include an overbridge from the carpark to the eastern side of Roy Watts Road to minimise conflict with the significant increase in vehicles which will be using this road.

Continued use of the at-grade pedestrian crossing will cause significant delay and may become a safety issue.

Recommendation: Greater consideration should be given to the drop off zones for both the existing schools and the proposed school.

f) Active Transport

The potential regional active transport links shown are unlikely to be deliverable and realistic expectations should be reflected in the plan. The western link is through Bunbury Curran Creek traverses land which is bounded but not fenced by part of the Macquarie Links community scheme. It is unlikely that this would be an acceptable outcome for the community residents. Also, the flows in this section of Bunbury Curran Creek are significant in even minor events and pose a significant risk to safety.

The link to the east would need to pass under the rail corridor and Railway Parade. This would be very difficult to achieve due to the topography and physical constraints in this area. Additionally it is unlikely to be acceptable from a public safety perspective.

Recommendation: That the proposed regional active transport links be re-designed to follow routes that can be implemented.

g) Existing Cultural Tree

The siting of the existing cultural tree in a precinct of proposed medium density residential development will challenge its survival and interpretative context. This land should be appropriately zoned to ensure its ongoing management by a relevant authority.

Recommendation: The culturally significant tree should be on more appropriately zoned land that can be managed in perpetuity.

4. Cambridge Avenue Upgrade

a) Land requirement

The preferred route option would result in the loss of multiple houses in Minstrel Street and Guardian Crescent off Glenfield Road. Unfortunately, the overview map does not illustrate this accurately such that impacted land owners may not be fully aware.

The evaluation report indicates that the future urban development of the surplus Hurlstone Agricultural School would limit the yield of this precinct as reason (in part) for selection the option that requires private land resumption.

Concern is raised that alternate methods of construction, such as retaining wall systems or an elevated roadway have not been considered due to maintenance concerns. These alternate methods may limit the extent of batters required and reduce the need for land acquisition.

Recommendation: That alternate construction methods that reduce the extent of land acquisition be considered. An elevated roadway may also facilitate a more direct pedestrian/cycle connection between the Hurlstone precinct and the GURA.

b) Road Design

Concern is raised that grade intersections at Campbelltown Road off ramps will increase, not reduce, congestion.

The proposed bridge to the north of the existing bridge would be closer to the intersection of Railway Parade and the current private road that serves the Glenfield Waste site. While not an issue with current traffic volumes, the waste site is zoned for industrial development, including uses that could be ancillary to the Moorebank Logistics Park.

Concern is also raised with the absence of right turn provision from the M5/M31 at Campbelltown Road. This would result in a longer route for motorists with 6 additional traffic signals. It is understood this right turn cannot be provided due to the height difference between the old bridge and the new bridge. Although the new bridge would be built to current height clearances, assurance is sought that raising of the existing bridge is on the works program for TfNSW. If it is not, it does not make sense to raise the new bridge deck and make it impossible to include the right turn movement.

Finally, the Glenfield Land Use and Infrastructure Plan shown in Figure 6 of the Options Evaluation Report is not consistent with current planning for Glenfield as shown on the DPIE website. Confirmation is sought that assessment of intersections on Cambridge Ave has considered the latest proposal for growth in Glenfield and can provide appropriate levels of service.

Recommendation: Provision should be made in current design to permit right turn movement at the M5/M31 intersection with Campbelltown Road. Confirmation is also required that the latest growth projections have been used to inform intersection performance.

5. Infrastructure Funding and Delivery

The provision of timely, fit for purpose infrastructure is critical to the delivery of the draft Strategy. Although major infrastructure would be provided by the NSW Government, Council would be responsible for local infrastructure such as open space, drainage infrastructure and community facilities.

Council's exiting Contributions Plan adopted in December 2018 currently applies to both the western and eastern precincts. It is anticipated that this plan would continue to apply to the eastern precinct, with opportunity to consider voluntary planning agreements or a site specific contributions plan for the western precinct that is approved by the Independent Pricing and Regulatory Tribunal.

Concern is raised that without an approved special infrastructure levy by the NSW Government, developers could be charged different rates for the same form of development as each would be required to enter in a voluntary planning agreement with the NSW Government. Although satisfactory arrangements provisions are supported, this should be supported by a transparent plan in the same way that Council is required.

Recommendation: That a special infrastructure contribution be finalised and published contemporaneously with amendments to Councils CLEP 2015.

Conclusion

The recent public exhibition of the Draft Glenfield Place Strategy and Cambridge Avenue upgrade reflect a whole of government approach to resolving the future role and function of the precinct and Hurlstone Agricultural School. As the first railway station of the new connection to the Aerotropolis, and one that provides a critical public transport connection to a significant part of the wider Sydney area, Glenfield is uniquely located to provide strategic and high quality mixed tenure housing that is supported by commercial and other institutional uses.

To support the successful implementation of this plan, it is recommended that Council forward a submission to the Department of Planning, Industry and Environment and Transport for NSW indicating its general support of the exhibited documents, subject to addressing the issues outlined in this report and not support the proposal to acquire private lands at Hosking Crescent and Railway Parade for the purpose of public open space.

Attachments

Nil

8.4 Glenfield Place Strategy Submission

It was **Moved** Councillor Chowdhury, **Seconded** Councillor Manoto:

That Council endorse a formal submission to the NSW Department of Planning, Industry and Environment and Transport for NSW on the draft Glenfield Place Strategy and Cambridge Avenue Upgrade with matters contained in this report.

026 The Motion on being Put was **CARRIED** unanimously.

8.5 Quarterly Report - Clause 4.6 Variations to Development Standards

It was **Moved** Councillor Oates, **Seconded** Councillor Morrison:

That the information be noted.

027 The Motion on being Put was **CARRIED**.

8.6 Re-appointment of Local Planning Panel Members

It was **Moved** Councillor Lake, **Seconded** Councillor Rowell:

That:

1. Council re-appoint the current, Chair, expert and community members to 30 June 2021 as follows:
 - a) Mr Ian Reynolds as Chair and Mr Stuart McDonald as the alternate Chair.
 - b) Ms Mary-Lynn Taylor and Mr Scott Lee as the expert members and Ms Helena Miller as the alternate expert member.
 - c) Ms Cecilia Cox as the community member and Mr Phil Hayward and Mr Edward Saulig as the alternate community members.
2. Due to the resignation of Dr Keith Dedden and Ms Jenny Rudolph, the General Manager be delegated the authority to select an alternate Chair and expert member from the NSW State Government's expert pool for the temporary period to 30 June 2021.

028 The Motion on being Put was **CARRIED**.
