

Draft Western District Plan

Submission_id: 31278

Date of Lodgment: 14 Dec 2017

Origin of Submission: Online

Organisation name: Dart West Developments

Organisation type: Industry

First name: David

Last name: Taylor

Suburb: 2567

Submission content: Please see attached submission.

Number of attachments: 1

A New Vision for Narellan Camden LGA's Strategic Centre



**Submission on the
Draft Western City District Plan**

December 2017



1. Introduction

This submission has been prepared by Dart West Developments on behalf of the owners of the Narellan Town Centre shopping centre.

The Draft Western City District Plan sets out a long term, high level vision for the growth of South West Sydney. South West Sydney is a place of exceptional opportunity, and the District Plan faces a challenge in bringing together a complex range of planning and infrastructure initiatives to ensure that a clear and legible strategic planning framework is in place to guide and encourage development in a manner which secures the long term quality of life for South West Sydney's residents and ensures that once in a generation opportunities are seized.

The submission draws on material previously submitted to the Greater Sydney Commission in March 2017 in response to the first draft South West District Plan. Updated information on Narellan's current status and recommendations to the GSC are included in this submission.

It is arguable that nowhere else in Sydney deserves more planning focus than the Western Parklands City. While growth will be widespread across the metropolitan area, the extent of growth in South West Sydney is perhaps the greatest. Given the existing planning challenges already facing South Western Sydney, the downside implications of not getting the planning and infrastructure frameworks for South West Sydney right are perhaps the most substantial. The Commission's recognition of the need for a Western City to drive a more balanced social and economic outcome for a future Sydney of 8 million people is evidence that the Commission understands the importance of the planning framework for South West Sydney.

Deservedly, much planning energy is focused on the opportunities associated with the proposed development of the Western Sydney Airport. The airport will clearly be a major shaper of planning outcomes (infrastructure, employment, transport accessibility etc). However, it should not be seen as the sole determinant of growth patterns in South West Sydney in either a spatial or temporal sense.

Careful attention also needs to be given to existing and growing centres to ensure that the daily needs of people living and working in South West Sydney can be met. The Greater Sydney Commission has rightly identified Narellan as a strategic centre. This submission highlights the existing investment momentum in Narellan, but also argues that the planning framework currently in place in Narellan is inadequate and is already constricting the investment necessary to deliver more jobs, a greater diversity of jobs and more medium and high density housing.

The draft District Plan identifies three actions for Narellan:

- investigate infrastructure capacity to support growth;
- undertake an urban design review and review planning controls; and
- review the vision for the centre.

All are worthwhile, but Council is identified with lead responsibility and no timeframes are identified. We believe that a more ambitious list of actions should be reflected in the final version of the District Plan, with the GSC taking a lead role in working with Council and key stakeholders to drive the planning change necessary to achieve a range of planning objectives which are critically important in the short term. No planning work for the wider Narellan centre has been undertaken since 2003, so clear and direct leadership is required.

Camden Council has also stated in its submission on the draft District Plan that "planning for the Narellan Strategic Centre not commence ahead of commitments from the NSW Government to key

infrastructure construction and upgrades that will support the growth of this centre.” We share Camden Council’s desire to see infrastructure commitments (particularly the north-south rail link) made as soon as possible, but also believe that the planning review can commence, and needs to commence, immediately.

The following action list is therefore proposed in relation to Narellan:

- identify Narellan as a priority precinct;
- comprehensive vision setting process and review of planning controls to be completed by December 2018, with joint lead responsibility by DoPE or GSC and Camden Council;
- gazettal of new LEP in mid-2019;
- work is to be informed by creation of new Section 94 contributions plan for the centre focused on local road network and public domain improvements and confirmation of potential SIC levy style arrangements, as well as engagement with utility authorities;
- urban design review and masterplan for centre to be prepared, with strong focus on encouraging medium and high density housing in residential areas within walking catchment to south of Narellan Town Centre and creation of business park/office environment on existing outdated industrial land surrounding proposed station site; and
- transport strategy to be prepared with specific plans to manage transition from current bus services to improved bus network outcomes in advance of rail being delivered at the earliest possible opportunity.

Narellan Town Centre is clearly already the catalyst major development in South Western Sydney and in Narellan in particular. Its recent expansion to more than 70,000m² provides ample evidence of the market’s willingness to invest in Narellan. The centre also has significant further potential to grow to meet the rapidly growing needs in the Camden area. However, the growth of the centre alone is an insufficient response to the various planning challenges facing the rapidly growing Camden area. A more diverse range of employment, significant growth in total employment, improved public transport, improved public domain and a wider range of community services are all essential to support this growth, and Narellan is ideally placed as the predominant strategic centre capable of delivering these outcomes.

However, as argued below in this submission, the planning framework for Narellan is significantly outdated and needs urgent review, with strong leadership provided by the Greater Sydney Commission through both its completion of the Western City District Plan and its subsequent actions to implement the plan.

2. Narellan Today

Narellan today is a centre experiencing significant change. The expansion of Narellan Town Centre is the primary catalyst for this change, but a range of transport infrastructure improvements and proposals will also drive this change.

Parts of the town centre reflect the range of opportunities which the future community of Camden will require. Community facilities like the library, police station, community centre and health centre have been built or expanded in recent years. Narellan Town Centre, the main shopping centre, has recently undergone a major expansion, and has further room to grow. Planning for that next phase of expansion is now underway. Camden Council is delivering a major new recreational facility, the Narellan Sports Hub, on the northern edge of the centre. Camden Golf Club is on the periphery of the centre, performing an important recreational, community and landscape role. A new school for children with special needs is under construction by the NSW Government.

Other parts of the town centre of Narellan reflect the planning framework of previous decades. Land uses are segregated rather than integrated, and pedestrian links and the wider public domain are generally poor. Important pieces of the puzzle are in place, but they are not knitted together effectively. The industrial area centred on Grahams Hill Road is a dynamic and varied source of local jobs and services, but the building stock in many cases is ageing and would not meet the needs of new businesses looking to locate their operations in Narellan or allow existing businesses to grow. There is very limited office space available limiting options for local jobs for the increasingly skilled local workforce. Much of the housing stock surrounding Narellan was developed in the 1970s, and reflects housing preferences and design trends from that era. Almost all of this housing is larger family homes, with very little housing diversity to meet contemporary market needs.

The overall feel for Narellan is that it is a fragmented place without a strong sense of identity. Old and new buildings are interspersed and commercial development, with a few exceptions, is small scale and land intensive.

The last masterplanning process for Narellan was undertaken fourteen years ago. At that time, the vision was for Narellan to be an important local centre, with a focus on retail development and community services. Narellan was to play a complementary role to the historic Camden town centre. This planning work was done before the South West Growth Centre was planned, and as a result, Narellan was seen as playing a local role meeting the needs of a Camden which would grow to perhaps 60,000 people.

The strategic planning context for Narellan has changed in so many ways since this vision was established. The list below is just a selection of these changes.

The Western Sydney and South Western Sydney Priority Land Release Areas have since been planned and the first of 110,000 new homes are being delivered in a number of new communities within 10 minutes of Narellan. The Greater Macarthur Priority Growth Area has also recently been identified nearby and is planned to deliver a further 33,000 new homes.

Western Sydney Airport is planned to be operating in 2026, with construction scheduled to commence in 2018. The airport will be 15km from Narellan.

The Broader Western Sydney Employment Area, located to the north of Western Sydney Airport, will bring tens of thousands of new jobs to the area. The “aerotropolis” concept planned at Badgerys Creek in conjunction with the Western Sydney Airport will see significant uplift in employment opportunities. Even this will, however, be nowhere near enough to address a forecast jobs deficit in Western Sydney likely to approach 300,000 by 2036 without significant corrective action.

Significant road improvements have already commenced in preparation for the airport and to meet ongoing growth in the Camden area. These are also improving the accessibility of Narellan, and will drive growth in the wider area surrounding Narellan.

Both draft Future Transport 2056 and the draft Western City District Plan, as well as the draft Greater Sydney Region Plan, identify a north-south rail link serving Western Sydney with Narellan identified as a core station site.

The impact of these investments cannot be understated. They are about more than just allowing people to move around more efficiently. They will fundamentally alter the economic geography of Western Sydney, making the Camden area a more attractive place to live and in which to invest and grow a business. Infrastructure investment of this scale will attract business and housing investment of a comparable scale. Narellan has a key role to play as a location for this investment.

3. Tomorrow's Narellan

The opportunity exists for Narellan to be a showcase for modern urban development trends, with a focus on social, economic and environmental sustainability. A future Narellan will be more diverse, with a wider variety of housing choice and a much greater range and number of local jobs available for residents. Outstanding community facilities and open space will support these new communities, and transport infrastructure improvements will underpin quality of life through reduced travel times.

This modern and diverse city needs a new heart, a major regional centre which is a focal point for the best that the city has to offer. Narellan is ideally placed to be the heart of the new Camden for a number of reasons.

Narellan Town Centre is already a major regional shopping centre providing retail and leisure facilities demanded by modern Australian households, all available in the local area for the first time. The centre has significant potential to continue to grow, and will be of a similar scale to the major shopping centres in Penrith, Blacktown, Liverpool and Campbelltown CBDs.

Figure 1 – Narellan Town Centre



Narellan will be a gateway centre for people who live in the Southern Highlands and Wingecarribee and Wollondilly LGAs who are travelling to the new airport, the new employment hub around the airport and even through to Penrith.

The retail heart of the centre will be complemented by conveniently located sports facilities at the Narellan Sports Hub and Camden Golf Club, both on the edge of the wider town centre.

All the key local roads will have been upgraded, providing convenient access to Narellan and facilitating much improved bus services linking Narellan to the surrounding existing and new communities.

A new railway station is proposed to be located in the heart of the town centre, dramatically improving the transport accessibility of the centre, and making it much more likely that office based businesses will choose to locate in the centre. These businesses will be able to draw on a much wider pool of higher skilled workers as the Camden area grows.

The Narellan industrial area has the potential to become a major mixed use and employment zone, with a diverse range of jobs, and for the first time in Camden, a large number and significant range of higher order, professional, office based jobs. These jobs will be filled by locals, reducing the time consuming out-commute that currently hinders the lifestyle of many people who live in the Camden area.

Older housing will be replaced by a diverse range of new housing choices, with medium density townhouses and retirement living on the fringes of the town centre, transitioning to high density apartment living in close proximity to the railway station, main bus routes and the Narellan Town Centre shopping centre. This new housing will offer convenient access to the facilities located in the town centre, and will also play a key role in driving improved housing affordability and diversity, meeting the needs of younger people not currently able to access the housing market and the ageing population looking to remain in the Camden area but in housing more suited to their needs.

The increased number of workers based in the centre and residents in and around the centre will make the town centre of Narellan a much more vibrant place with the streets buzzing through the day and into the evening. A much improved pedestrian environment will encourage higher levels of street activity and reinforce the viability of businesses fronting the key streets such as Camden Valley Way, Old The Northern Road, Queen Street, Somerset Avenue and Elyard Street.

Narellan will also be a hub for government and community services. Building on the existing range of facilities, the centre has the potential to attract new services and facilities which will meet the emerging and evolving needs of the existing and future residents of Camden.

In summary, Narellan will be a vital and diverse place which acts as the beating heart of the rapidly growing Camden LGA. Everything that is required to live a modern Australian lifestyle in a great Australian city will be available in and around the town centre of Narellan. Narellan will complement the local centres of Oran Park and Camden as the key elements of the centres hierarchy of the LGA, with Leppington playing a regional role similar to Narellan with its catchment to the north-eastern end of the Camden LGA.

4. Current Planning Framework

It is clear that the strategic planning context for Narellan has completely evolved in the last ten years. However, the statutory planning framework and its associated zonings and development controls remain disconnected from this rapidly evolving strategic context. The 2013 rezoning to support the expansion of Narellan Town Centre was concentrated on the shopping centre site and the immediate surrounding streets of the southern side of Camden Valley Way, Somerset Avenue and Queen Street. It did not examine the wider Narellan town centre area because it was largely a project specific rezoning to facilitate the current expansion of the shopping centre.

The statutory controls in place for the wider town centre therefore largely reflect the earlier vision of a local centre. The current land use zonings provide limited potential for further retail or commercial office growth (other than on the Narellan Town Centre sites and immediate surrounds) and only very limited opportunity for residential densification.

Floor space ratio controls apply to the B2, B5 and industrial zones and are set at 1:1. This is typical of the low density employment and commercial outcome, and again is inconsistent with the longer term potential for the centre. In contrast, parts of Castle Hill town centre, also benefitting from a proposed new railway station and the main centre in The Hills, have FSRs ranging from 2.3:1 up to 6.4:1.

Existing height controls in Narellan are characterised by 25m on the shopping centre site, 15m on Somerset, Queen and Elyard Streets and 9.5m in the industrial, B5 and medium density residential zones. Comparably located areas at Castle Hill have height limits ranging from 16m up to 68m in close proximity to the station and shopping centre. Again, it is clear that the full potential for Narellan, taking into account the strategic context for the centre, will not be able to be realised under the current height controls.

The current zoning framework and associated development controls in the proposed railway station precinct do not reflect the potential for the development necessary to support the viability of the rail system.

The development controls highlighted above are selected to provide examples of where the planning controls which are currently in place would hinder and even prevent the achievement of the vision outlined above for the town centre of Narellan. Castle Hill is provided as one example of a Western Sydney centre which is regarded as the major centre of a rapidly growing LGA which is also going to benefit from major improvements to transport accessibility once the North West Metro opens. There are many other centres in Western Sydney which have planning controls in place which accommodate denser forms of development in key locations.

Narellan, in contrast, under the existing planning controls will have a shopping centre of a size comparable to the other major Western Sydney centres, but the remainder of the centre would be left under-developed, with the result being inadequate services and facilities for the wider Camden community and much reduced local employment.

5. Narellan's Growth and Rail

The owners of Dart West own Narellan Town Centre and they believe that the centre has significant potential to grow beyond its current size as the residential catchment continues to grow in the coming years. Importantly, they see the centre playing an increasing role in supporting much needed commercial office development and housing diversity, as well as retail expansion. Planning work for this growth is underway and further rezoning work will be required in the medium term.

The shopping centre and its associated non-retail uses are the key driver of growth in Narellan at the moment, but it is critical that they are supported by growth in the wider town centre. As noted above, such growth is currently constrained by the existing zonings and development controls.

Retail analysis undertaken to support the 2013 rezoning to enable Narellan Town Centre's most recent expansion confirmed that substantial further retail capacity will be required even if Narellan and Oran Park town centres both reach their current maximum floorspace potential. Even rudimentary statistics on total job provision and the range of job types available locally shows that a significant revision of the planning framework is required.

The catalyst for a wholesale rethink of Narellan's role will be a commitment by the NSW and Commonwealth Governments to delivering rail to Narellan. Dart West urges the Commission to do all in its power to see that commitment made at the earliest possible opportunity. Dart West also believes that it is essential that the whole of the north-south rail project is delivered in one stage. Linking the Campbelltown – Macarthur element of the Metropolitan City Cluster via Narellan to the future development to the north such as Oran Park, Western Sydney Airport, the aerotropolis, Sydney Science Park, the Broader Western Sydney Employment Area and the centres on the Main Western Line will be essential in establishing the urban structure, job diversity and commuting patterns that will deliver the 30 minute city vision of the Greater Sydney Region Plan.

Dart West is keen to work with the Commission, Camden Council and the transport agencies to collaborate in delivering rail to Narellan. We look forward to the delivery of the City Deal and working with the Commission and Camden Council to review the planning framework for Narellan. We believe Narellan has the potential to grow substantially and contribute to the planning objectives outlined in the draft District Plan. We also believe that there is significant urgency in moving forward on these issues given the rapid ongoing residential growth in the corridor.

6. Conclusion

Dart West supports the Commission's focus on Narellan as a strategic centre. We are also strongly supportive of the commitment in the draft District Plan, draft Greater Sydney Region Plan and draft Future Transport Strategy 2056 to deliver rail in Western Sydney, including in Narellan.

We believe that Narellan has the potential to continue its growth. We are committed to investing significantly in this further growth across a range of land uses, including further expansion and diversification of Narellan Town Centre.

We also believe that Narellan must grow as a strategic centre. Narellan is already an established centre with significant investment momentum. Further investment is however constrained by the current planning framework, and we believe that a wholesale and collaborative review should commence immediately, so that Narellan can deliver on the planning objectives in the suite of strategic planning strategies at the same time as the rapid residential growth in the Camden area is growing, not after this growth has happened. Based on growth patterns in the last ten years, somewhere between 50,000 and 100,000 additional people may live in the Camden LGA within the next ten years. Narellan must grow alongside this residential growth to ensure that local jobs are in place to match the workforce and community needs.

Dart West is committed to working with all key stakeholders to deliver on the emerging vision for Narellan. We emphasise the need, also identified by Camden Council, for the earliest possible commitment to the delivery of rail services to Narellan and believe that such a commitment will unlock significant growth for this key strategic centre.