

# ATTACHMENT 3

08 May 2013

Mr Sam Haddad  
Director General  
Department of Planning and Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr Haddad

## **SUBMISSION - DRAFT METROPOLITAN STRATEGY FOR SYDNEY TO 2031**

Please accept this submission on behalf of Campbelltown City Council relating to the *Draft Metropolitan Strategy for Sydney to 2031* (Draft Strategy).

The overall position of Council is that the success of the Draft Strategy to promote sustainable urban growth for the Sydney Region will depend upon Government commitment to the timely delivery of key infrastructure and projects which specifically support job creation, to service future planned urban growth across the whole of the City.

It is acknowledged that the south western areas of Sydney have a key role to play in accommodating a substantial proportion of the overall future urban growth of the City.

This will be achieved through the SW Growth Centre and other urban release areas located in south western Sydney, in addition to the absorption of higher density housing in and around existing urban centres and transport hubs.

In light of these policy intentions, the Government must understand that Council has no alternative other than to express some concern over an absence of detail in the Draft Strategy. This concern is generated as there is no reference to any specific items for future Government investment in strategic infrastructure projects or employment creation initiatives that would address the needs of existing and future SW Sydney communities.

These issues are amplified as the draft Strategy includes similarly needed infrastructure and support for more established parts of the Sydney Metropolitan Area.

Without Government commitment to the proper infrastructure provision for the targeted growth areas of the SW region, it is likely that the relative inequities and disadvantage that are already experienced by residents in the Macarthur area, including Campbelltown, will not be significantly altered.

Additionally, the opportunities for Campbelltown to strengthen its role and function as the principal urban centre for the Macarthur Region will be compromised to the disadvantage of our community.

The specific issues and concerns held by Council on the Draft Strategy are provided under the respective headings below.

### **Planning Imbalance**

The Draft Strategy is considered to be imbalanced with respect to concentrating business investment, job creation and infrastructure provision within the more central and established urban areas of Sydney, whilst setting key housing and employment growth targets in western Sydney particularly for the Macarthur Area.

Seven of the nine 'city shapers' depicted by the Draft Strategy are focused on more established areas within the City, and there is no recognition of the South West Growth Centre as a city shaper, notwithstanding that it will provide a major metropolitan scaled housing growth precinct for Sydney for many years to come. For example, light rail infrastructure is planned for the already highly serviced areas of eastern Sydney, however, there is no definite commitment to railway infrastructure for the South West Growth Centre, beyond Leppington.

Further, the emergence of the south west as an important freight, logistics and distribution hub for the metropolitan area has not been recognised as a major driver of economic growth, which will require special attention by Government with regard to infrastructure investment.

It is the position of Council that dealing properly with this 'city shaping' opportunity now, would help avoid potential negative environmental and congestion impacts in the longer term. It would also add value to the potential for this 'hub' to generate even more jobs to help address the employment challenges facing the south west.

On the matter of employment, Council notes that 15 'specialised precincts' have been identified for the promotion of growth and investment opportunities in places that 'play an economic and employment role of metropolitan significance in Sydney, sometimes associated with a hospital or university or an important business park or office cluster'.

Council notes with concern there are no specialised precincts identified for SW Sydney, despite Campbelltown/Macarthur clearly satisfying the eligibility criteria under the Draft Strategy for specialised precincts. These include the 'colocation' of UWS recently established Medical School; Campbelltown Public Hospital; two railway stations and access to the M5 as well as strong retail facilities. Other precincts with less significant infrastructure and investment already in place, appear to have been recognised as being worthy of Government recognition as a 'specialised precinct'.

Council requires clarification as to why the opportunity to list Campbelltown/Macarthur as a nominated 'specialised precinct' has not been taken.

### **Proposed Boundaries of Southwest Subregion**

The relevance of the six Local Government Areas grouped within the proposed revised SW Sydney Subregion should be re-examined. The nominated boundaries of the SW Subregion, which has been amended to include Bankstown and Fairfield, does not reflect the stronger links and interdependence of Campbelltown and the Macarthur more generally, with the Southern Highlands and the Illawarra.

It is suggested that Campbelltown has stronger economic and 'service' ties with the regional communities of the Southern Highlands and to a lesser extent the northern Illawarra, than it has with Bankstown and Fairfield. This includes direct road and rail network connections, workforce participation, and freight movements from Port Kembla.

In many ways, Campbelltown serves as the regional gateway to the Sydney Metropolitan area for these outer areas, which has been overlooked in the Draft Strategy.

Given the role of Campbelltown as a metropolitan link with these outer areas, the Draft Strategy should consider the promotion of Campbelltown to regional status and reconsider the strategic relationship with the areas nominated more so than with Bankstown or Fairfield.

### **Regional Status of Campbelltown/Macarthur Centre**

Accordingly, the Draft Strategy undervalues the urban status of the Campbelltown/Macarthur Centre as the dominant urban precinct of the South West Region, which must be re-examined.

Campbelltown/Macarthur should be considered as a regional city centre given existing and potential opportunities to provide regionally significant medical, retail, and education services. Its dominant service role and metropolitan transport connections for the surrounding region are already in place and undeniable. The City is strategically placed to serve the key urban growth areas planned for the south west, and provides an important metropolitan link to the peripheral urban areas of the Southern Highlands and Wollongong.

Campbelltown/Macarthur satisfies the relevant criteria under the Draft Strategy for regional city status, and in certain instances exceeds the criteria compared to other major metropolitan centres. For example, Campbelltown/Macarthur has the highest jobs growth target of any major centre in the Draft Strategy, comprising a minimum jobs growth target of 10,000 jobs. This figure exceeds the targets for the nominated Regional Cities of Liverpool (9000) and Penrith (8000).

Whilst Campbelltown is clearly identified as a 'major centre' under the Draft Strategy there is little recognition of the potential of Campbelltown/Macarthur to continue to naturally emerge as a regional city in its own right. This is in contrast to Metro 2036 which identified Campbelltown (and Blacktown) as having the greatest potential to achieve this regional level status.

### **Lack of Detail and Certainty for South West Sydney**

Council believes the Draft Strategy generally inappropriately restricts the detailed and significant commitment of Government investment into infrastructure and employment generation projects to those located within the 'Global Economic Arc', and other nominated specialised precincts none which are located within the Macarthur region or Campbelltown Local Government Area.

Whilst there are clear targets for housing delivery and employment growth for South West Sydney, there are no clear commitments to match the strategic funding and delivery of infrastructure and investment through key projects to sustainably achieve these targets. This information is deferred to a range of future Plans and Policies to deliver the intended outcomes.



Council believes that this approach may disadvantage the future prosperity and well-being of the community of south western Sydney, in the allocation of scarce public resources for investment into 'enabling infrastructure' and job creation.

Importantly, the Draft Strategy needs to provide a stronger commitment to support economic drivers so as to ensure that the market actually achieves the forecast housing and employment targets. In this respect, the Draft Strategy should include clear infrastructure and investment commitments, similar to that outlined for the 'Global Economic Arc'. This would add certainty and confidence in the urban growth outcomes for South Western Sydney being achieved in a sustainable manner in the best interest of our community.

### **Centres Hierarchy**

The strategy should take into consideration that the planned hierarchy of metropolitan centres to serve the South West Growth area, may be compromised by market driven outcomes.

If the Draft Strategy does not provide clear rationale to steer private sector investment into centres in accordance with the strategic hierarchy, then the provision of subregional services by the planned major centres may be compromised through market uncertainty.

The Draft Strategy should provide a very clear rationale to manage the status of town centres so as to create greater certainty for private sector investment to grow the planned hierarchy of major centres and sustain confidence over the future provision of infrastructure to serve this planned hierarchy.

In the overall planning context relating to the hierarchy of centres, Council considers that there is good reason to review the status of Ingleburn Town Centre given the strategic location of the centre and significant capacity for growth. Taking into account the major public investment proposed for Ingleburn Railway Station and carparking Council considers that Ingleburn has potential to achieve major centre status.

### **White Paper Implications**

Under the current planning system, the Metro 2036 is only given statutory recognition by a 'S117 Ministerial Direction' which requires 'planning proposals to implement the vision, transport and land use strategy, policies, outcomes and actions of the Metropolitan Plan for Sydney 2036'. In this respect, the role of the current Metropolitan Plan is generally limited to the preparation of new planning proposals and policies, and does not prevail over current statutory planning controls.

However as the proposed NSW Planning reforms eventuate, the new Draft Strategy will be likely to have a more significant role in influencing development outcomes for Sydney. Under the proposed reforms, the Draft Strategy would have formal recognition as a Metropolitan Growth Plan and would potentially allow for 'conforming development' to be approved in certain instances. In this respect, the role of the Draft Strategy would extend beyond policy control into the realms of development assessment and approval.

Consequently, it is considered that there may be some risk that the strengthened role of the Draft Strategy under the proposed planning reforms may provide for development outcomes which may not adequately consider local planning circumstances. This issue requires close examination and consultation with Council.

## **Transport Infrastructure**

Compared with Metro 2036, there are considered to be minimal amendments made to the Draft Strategy that would improve sustainable growth outcomes for the significant planned expansion of SW Sydney. Furthermore, the Draft Strategy's reliance upon the NSW Long Term Transport Master Plan to address transport planning outcomes does little to address the range of concerns previously raised with the NSW Government by Council on this matter.

The Draft Strategy makes no or minimal mention of a number of proposed strategic road and transport infrastructure to service Campbelltown or the Macarthur region more widely. This includes:

- Spring Farm Arterial
- Badgally Road
- Campbelltown Bus/Rail Interchange
- Cambridge Ave link to M5; and
- Denham Court Road upgrade.

No mention is made of a second Sydney Airport in any specific respect.

Notwithstanding, the Draft Strategy does recognise the need to protect the Georges River Parkway Corridor, which possibly indicates an intention not to abandon the Macarthur South Urban Land Release in the longer term. Council would appreciate clarification over that matter as soon as possible.

Commitment by the NSW Government to the timely provision of transport infrastructure to serve the planned population growth for the South West Region is considered critical to ensure that a sustainable land use outcome can be achieved. This includes continued access for residents to housing and services, in addition to encouraging investment and the creation of locally accessible employment opportunities. Without this commitment, residents of Campbelltown and the Macarthur region will be at risk of suffering further social and economic inequity with excessive travel times and associated reduction in lifestyle quality.

This is a different outcome that is likely to be experienced in some other parts of Sydney, particularly areas located closer to the Sydney CBD, should the Draft Metro Strategy be adopted in its current (exhibited) form.

## **Metropolitan Rural Areas**

The inclusion and acknowledgement of the Metropolitan Rural Areas in the Draft Strategy is commended in terms of ensuring a strategic balance is provided between the urban growth and rural areas. However, it is considered that the Draft Strategy should provide more specific and measurable targets to ensure the proper management and conservation of these rural areas is achieved. This may include targets such as environmental or land holding criteria.

In this respect, issues are raised that the Draft Strategy may not sufficiently curtail ad-hoc and market driven development of the nominated rural areas, for urban growth. This includes the possible facilitation of owner nominated sites for advancement of urban subdivisions in existing non-urban areas ahead of strategically planned urban growth areas and related programmed infrastructure provision. Council looks forward to receiving further detail on this matter following the preparation of the Government's proposed new urban land release policy.

As such, it is considered that the Draft Strategy should provide greater certainty in properly balancing the potential for land use conflict occurring from new urban development in existing rural areas. This would include for example, impacts on biodiversity, water catchment management, agricultural sustainability and resource acquisition.

### **M9 Route**

It is understood that the alignment of the M9 corridor for the Outer Sydney Orbital is very preliminary. However, as a Strategic Plan for future growth within the Metropolitan Area, it is considered that this corridor should be identified and reserved as early as possible to ensure local planning decisions do not compromise the alignment. This would include a greater level of detail on the intended north and south connections.

Additionally, consideration should be given to the land use implications of providing a vital piece of road infrastructure through rural areas, particularly given the likelihood of urban growth being encouraged along this corridor. For this reason, consideration should be given to the M9 being aligned to better integrate with and potentially service the population and employment growth areas of western Sydney.

### **Conclusion**

Having regard to the above issues and concerns, Council requests that the Department reconsiders the Draft Strategy to address the apparent inequity between the key housing and employment growth targets for western Sydney, and the focus on infrastructure and investment commitments towards the 'Global Economic Arc' and other more established urban areas of Sydney.

Accordingly, Council is concerned that the significant urban growth areas targeted for the SW region will not be sustainably managed and serviced with the required infrastructure.

Overall, Council seeks the reassurance of the Department and the NSW Government, that the Metropolitan Strategy will be revised to achieve a much reduced jobs deficit for south western Sydney. Clearly, the proposed urban growth is not targeted to be served by an appropriate investment in new job creation. This is perhaps the most significant issue of concern, given its importance in assisting with the achievement of an improved quality of life for our community.

I look forward to your feedback on the Draft Strategy and wish to emphasise Council's commitment to continuing to work with the Department to progress and finalise this important Policy. Accordingly, Council would appreciate the opportunity to meet with representatives of the Department to speak further on the Draft Strategy.

If you require any further information please contact me on 4645 4659.

Yours sincerely

Paul Tosi  
General Manager