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Department of Planning and Infrastructure
Secretariat for Draft Metropolitan Strategy for Sydney
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Dear Sir / Madam

Draft Metropolitan Strategy for Sydney Submission: Request to include Ingleburn Centre as a 'Potential Major Centre' in the Strategy

1.0 Introduction

We refer to the NSW Department of Planning and Infrastructure's (DP&I's) invitation for public submissions to be made on the Draft Metropolitan Strategy for Sydney (**Draft Metro Strategy**).

We act for the Ingleburn Chamber of Commerce and Industry. A dynamic volunteer organisation focussed on promoting and progressing Ingleburn as a retail, commercial, industrial and residential centre. Members include long term residents, small business proprietors, employers and individuals with land interests in Ingleburn and the surrounding area.

This submission recommends that Ingleburn Centre be included as a 'Potential Major Centre' in the final Metro Strategy. This submission describes the attributes of the Ingleburn Centre and surrounds that would enable it to fulfil many of the key outcomes and objectives for the South West Subregion. Subregions in the Draft Strategy contain 'Centre' types with appropriate criteria to define the key outcomes for those centre locations. It is considered that Ingleburn should be declared a 'Potential Major Centre' to fully capitalise on its existing and future potential, particularly in the provision of housing and employment.

This submission is set out in two parts. The first part (section 2.0) presents the case for Ingleburn with regard to the relevant key outcomes for Sydney as proposed in the Draft Metro Strategy. The second part presents a comparison between Ingleburn and Prairiewood in relation to the strategic centres criteria as provided in Appendix A: Centres Criteria.¹ Prairiewood has been identified as a Potential Major Centre for the South West Subregion, yet is inferior in several respects to other centres (including Ingleburn).

¹ Draft Metropolitan Strategy for Sydney (2013) p104

2.0 Ingleburn Potential Major Centre

Ingleburn is the second largest centre in Campbelltown LGA, outside of Campbelltown / Macarthur. It is an existing retail, commercial and services centre for a broad catchment of industrial businesses and residents.² The centre contains a shopping complex with two supermarkets (a development application to redevelop the complex has been lodged with Campbelltown City Council), numerous retail and commercial outlets and essential services including medical, dental and banking. Government services in the centre include Centrelink, Youth and Community Services, Health and Road and Maritime Services (RMS). Presently, Ingleburn is the only significant commercial centre located between Campbelltown and Liverpool.

Ingleburn is conveniently located adjacent to the southern railway line and Hume Highway, and is a significant industrial and employment location in the South West Subregion. These employment lands, predominantly located west of the railway, form part of the Employment Lands Development Report 2010. The report found that the South West Subregion contains 14% of all employment lands in the Sydney Region. Campbelltown LGA contains 731 hectares of which Ingleburn has 318 hectares. Thirty nine (39) hectares remain undeveloped.³

Ingleburn Centre contains a number of commercial buildings and services within walking distance of the Ingleburn railway station. The Southern and East Hills railway line provides direct services to Liverpool, Parramatta, Sydney and the airport. Bus services provide linkages to the surrounding suburbs, Campbelltown and Liverpool.

Existing residential accommodation in the vicinity of the centre is predominately older single dwellings on larger lots. The potential for Ingleburn to provide future centrally located higher density residential accommodation has been recognised in the Campbelltown LEP. Land use zoning allows mixed use and residential flat building development to four storeys.⁴ Recent Council approvals include 55 apartments in one development and 50 apartments in another, in addition to several townhouse / villa developments, all near or within the commercial centre precinct.⁵

Campbelltown City Council has also proactively engaged the Ingleburn community in the future planning of Ingleburn Centre by commissioning the *Campbelltown Centres Study, Structure Plan Framework Report (2006)*. This report outlines a Structure Plan for Ingleburn's future. The plan identifies the enormous potential of Ingleburn due to the proximity of the town centre and industrial lands to the railway. Through fortune or coincidence, Ingleburn's development occurred with the railway line forming a dividing line between the industrial precinct and commercial services core. This physical barrier enables conflicting land uses (mainly residential and industrial) to remain divided, yet close and promotes the provision of future residential accommodation close to a large employment area.

The following is a discussion on the objectives of the Draft Metro Strategy and Ingleburn. It shows that Ingleburn has the capacity to deliver many of the planning objectives espoused in the strategy.

² Campbelltown Council - *Campbelltown Centres Study, Structure Plan Framework Report (2006)*

³ Department of Planning & Infrastructure – EDLP 2012 Report, South West Subregion p5

⁴ *Campbelltown (Urban Area) LEP 2002*, Schedule 1 Map 4 - Ingleburn

⁵ www.campbelltown.nsw.gov.au/DevelopmentApprovals2013

2.1 Objective 1. Develop a new Land Release Policy and make new areas available for housing and jobs

Some key points made by the objective are:

A growing and changing population needs a wider choice of housing across Sydney so that people can work locally and can easily access shopping, education and services.

...encourage development to capitalise on existing and planned infrastructure.

...growing preference for housing and apartment living in existing urban areas, close to other suburbs and with good services.

Policy points:

b. Growth will be encouraged within the Metropolitan Urban Area to reflect market demand.

c. Increases in housing and employment will be encouraged in transport accessible centres and where existing infrastructure like schools are underutilised.

Ingleburn Centre is an excellent example of a centre with the ability to provide additional housing (of various types) near employment, services and transport. Ingleburn is an existing urban area where this objective can be realised within the timeframe of the Draft Strategy. A potential Major Centre designation for Ingleburn would help drive investor confidence and encouragement to develop.

2.2 Objective 2: Strengthen and grow Sydney's Centres

Sydney's large and small centres feature diverse land uses. Business and government investment has helped to create places with housing, public spaces and increased job densities that benefit from access to transport. The Metropolitan Strategy for Sydney can take advantage of our current pattern of centres by strengthening and growing Sydney's centres...

Policy points:

a. Plan for housing growth in centres of all sizes.

d. Mixed use development will be encouraged in all centres, including central commercial core areas, where there is market demand and complementary land uses.

Ingleburn is Campbelltown's second largest centre. This long established commercial and services core is currently undergoing significant urban consolidation and renewal. Recent developments include a multi-million dollar library, a purpose-built Centrelink office and a development application has been lodged for the redevelopment of the local shopping complex. All projects are within walking distance to the Ingleburn train station and local bus services.

The close proximity of local industrial / employment lands to the central commercial core, railway line and future housing makes Ingleburn a desirable location for significant growth.

These attributes are significant advantages that have the capacity to attract new development and redevelopment.

2.3 Objective 5: Deliver new housing to meet Sydney's growth

...across the whole city, are proposed minimum housing targets for each subregion to be delivered through new Subregional Delivery Plans.

For the first time in a Metropolitan Strategy, mid-term targets have also been set to better guide councils,...The 10 year target reflects where development is expected to be viable in the short to medium term,...

...construction of popular and much-needed low-rise, medium density housing, and for this development to be supported by transport and infrastructure.

Policy points:

b. New housing will be encouraged in areas close to existing and planned infrastructure in both in-fill and greenfield areas.

e. The supply of housing in established urban areas and zoned release areas will be fast-tracked.

The proposed minimum housing targets for the South West Subregion for 2021 and 2031 are 60,000 and 141,000 respectively. It is undoubtedly the case that a significant proportion of these housing targets are to be provided in the Growth Centre areas including Leppington and Edmondson Park. Notwithstanding this, Ingleburn has the potential to supply a substantial amount of higher-density in-fill housing in the short to medium term.

New release and Growth Centre areas supply a particular type of residential accommodation (i.e. low density) and it is not necessarily the ideal choice for all of Sydney's population. This is important as noted in the Draft Metro Strategy extract above and additionally in objective 1 above and objective 6 below. There is a growing preference for low-rise, medium density housing and apartments, particularly in established centres with existing transport and infrastructure. One of the key strategies that is adopted in the Draft Metro Strategy is the provision of housing in and around centres. The eastern side of Ingleburn provides a permeable, rectilinear street pattern that will enable many more medium density housing dwellings to be accommodated.

2.4 Objective 6: Deliver a mix of well-designed housing that meets the needs of Sydney's population

Feedback on the Discussion Paper during 2012 supported a greater variety of housing types and sizes, with submissions emphasising the need for medium density housing and mixed-use neighbourhoods.

...Sydney needs a greater number of smaller houses such as units, terraces and townhouses, and more specialised housing such as student housing, to meet the changing population and moves in market demand.

Sydney also needs a greater supply of lower-priced housing to ease pressures in the rental market. A recent investigation by Housing NSW into the supply of

affordable housing for lower income households in Sydney Metropolitan Region found rents are rising four times faster than inflation.

....opportunities to invest in mid-and moderately-priced housing in accessible places to boost supply and improve overall housing affordability.

Policy points:

- a. *We will plan for a range of housing types in Sydney to meet demand.*
- b. *Affordable housing for a mix of very low, low and moderate income earners will be provided across Sydney.*

As mentioned in section 2.3, Ingleburn is undergoing significant urban renewal in the centre. Mixed-use developments and higher density accommodation are being approved for development now. Ingleburn has the capacity to supply additional higher density residential accommodation in the foreseeable future.

The Campbelltown LGA is a major source of affordable housing for the metropolitan area. The Australian Bureau of Statistics (**ABS**) website provides simple statistical data from the current census on median weekly household income and median rental costs for LGAs across NSW.⁶ Table 1 shows a comparison between Campbelltown, Marrickville and Ryde LGAs.

Table 1: Household income and rental cost for a selection of Sydney Local Government Areas

LGA	Median weekly household income	Median weekly rent
Campbelltown	\$1,251	\$260
Marrickville	\$1,605	\$370
Ryde	\$1,466	\$370

Table 1 shows that the cost of rental accommodation increases as you get closer to Sydney. Also, the capacity of households to pay more (and directly drive up the cost) for rental accommodation increases as you move closer to Sydney.

Ingleburn, currently supplies the south western subregion with higher density, relatively lower cost accommodation in a centrally accessible location. Ingleburn can supply more affordable housing if given the right policy settings by the State Government.

2.5 Objective 7: Deliver well designed and active centres that attract investment and growth

Liveable centres enrich the quality of life and wellbeing of people who use them. They attract new housing development and spark increased investor interest...

Most new medium and high density housing will be encouraged within a five or 10 minute walk of existing and new centres,...

⁶ www.censusdata.abs.gov.au/censuservices/getproduct/census/2011/quickstat/LGA11500?opendocument&navpos=220

Policy points:

- a. Existing centres will grow and change and new centres will be supported.*
- b. Retail, employment, cultural and social infrastructure will be included in centres undergoing growth and renewal.*

Ingleburn is currently enjoying significant reinvestment. The permissibility of higher density residential accommodation and mixed-use developments has afforded investor interest. Significant projects in the centre include the new Library, the proposed redevelopment of the shopping complex and the approval of several multi-unit housing developments.

The interest in the rejuvenation of Ingleburn is supported by Campbelltown Council, and should additionally be supported by the NSW Government due to the proximity of Ingleburn to existing public transport and future proposed infrastructure developments such as the Moorebank Intermodal Terminal.

2.6 Objective 10. Provide capacity for jobs growth and diversity across Sydney

Minimum employment targets at the subregional level and the Strategic Centre and Specialised Precinct level represent a long term approach to help build capacity for jobs growth right across Sydney,...

While the market ultimately delivers housing and jobs, the minimum targets included in the Metropolitan Strategy for Sydney send a strong message about new opportunities across Sydney,...

...efforts to reach a target of 50 per cent of new jobs in Western Sydney to 2031.

Macarthur Regional Organisation of Councils suggested: "Employment generation needs to be recognised as a priority planning consideration in the South West....[especially] in terms of promoting and achieving economic growth."

Priority points:

- b. Subregional employment growth will aim to achieve minimum employment targets.*
- e. Fifty per cent of new jobs will be in western Sydney by 2031.*
- f. We will improve public transport connections to key employment areas and encourage more jobs closer to home.*

Ingleburn is already a significant industrial / employment location. The existing industrial area to the west of railway station had 8,297 jobs in 2006.⁷ The Ingleburn commercial centre increased the total employment in Ingleburn to in excess of 10,000 jobs in 2006.⁸

While the concentration of new jobs under the Draft Metro Strategy is aimed to be centred at the Western Sydney Employment Area west of Leppington, there is capacity within Ingleburn for jobs growth, both in the commercial centre and industrial area. Ingleburn's strategic location near the railway line and Hume Highway make it favourable for business

⁷ www.visual.bts.nsw.gov.au/tz

⁸ Ibid

location and accessibility. Current and proposed infrastructure developments such as the dedicated freight rail line and the intermodal terminal (at Moorebank) increase the appeal of Ingleburn for business / industry activities.

2.7 Objective 13: Supply a well located supply of industrial lands

Industrial lands close to rail, Highways, other major roads, or ports, airports and intermodal terminals have high strategic value, as do those with larger, regionally significant industrial precincts or that support existing or emerging industry clusters.

...encourage jobs growth close to where people live,...

...guided by the Employment Lands Development Program (ELDP) which monitors industrial land supply throughout the development pipeline,...

Existing industrial lands, especially in established areas, are under pressure to be rezoned to other uses, despite the clear need for them in the future.

Industrial lands supply the space enterprises and activities need to operate economically without being restricted by sensitive land uses. Providing a relatively unconstrained operating environment is more important than the number of jobs on a specific site. Itattract infrastructure and other industrial uses and activities to enhance freight and logistics efficiencies...

Policy point:

b. Industrial lands will better link with supply chains and markets.

As described above in section 2.7, Ingleburn is ideally located adjacent to the southern rail line and Hume Highway. It is also positioned close to future infrastructure developments (Moorebank Intermodal Terminal) and contains 39 hectares of developable industrial lands that can accommodate more jobs.

The existing road layout and the separation of the commercial centre and industrial precinct by the railway line means that potentially incompatible land uses will always be separated. There is likely to be no significant pressure to rezone employment land for residential purposes. This physical separation allows the industrial lands to operate in a fairly unconstrained environment and yet supply jobs growth close to a commercial centre and residential suburbs.

2.8 Objective 27: Deliver efficient freight connections

As the number of people living and working in centres grows, we must balance the desire for quiet streets with the needs of the freight industry. A balanced and consistent approach to land use decisions, including decisions on delivery times, will help avoid potential impacts.

Policy point:

a. Sydney's freight transport and intermodal terminal network will be more efficient and have greater capacity.

The requirements for freight are contained in the *NSW Long Term Transport Master Plan*. This plan identifies the need for additional intermodal networks to increase the amount of freight transported by rail.⁹ In the medium to short term, a network of new intermodal terminals is proposed for Sydney, including a terminal at Moorebank.¹⁰ The proposed precinct at Moorebank close to the M5 Motorway may increase the interest in Ingleburn's industrial lands. Ingleburn already plays an important freight / logistics role and this will only be strengthened by the Moorebank terminal.

As mentioned previously, the location of Ingleburn allows growth in both its commercial heart (both residential and commercial) and industrial precinct without compromising land uses in each.

3.0 Comparison with Prairiewood - another Potential Major Centre

The Draft Metro Strategy identifies two Potential Major Centres (at Fairfield and Prairiewood) and one Planned Major Centre (at Leppington) in the South West Subregion.

The designation of Leppington has merit because of its future role as the major centre for services in the South West Growth Centre. It will, like all the other major centres (except Prairiewood) be serviced by heavy rail. However, the selection of Prairiewood is rather odd given that no rail line is planned to service it, as well having limited prospects of jobs and dwelling growth.

Table 2 takes the criteria contained in the Draft Metro Strategy's Appendix A: Centres Criteria¹¹ and compares Ingleburn Centre to Prairiewood. The intent of the exercise is not devalue Prairiewood as a potential major centre, but to articulate a case for applying the same designation to Ingleburn which has at least as much opportunity to meet the criteria.

Table 2: Comparison between Ingleburn Potential Major Centre and Prairiewood Potential Major Centre

Draft Metropolitan Strategy Vision Criteria		Ingleburn	Prairiewood
Major Centre			
1.	Key structuring elements for growth in their subregions. They represent significant employment destinations as well as being active mixed-use centres with higher density residential development.	<p><u>Employment</u></p> <p>Ingleburn has been a significant employment location since the 1980s when the Macarthur Development Corporation first subdivided land.</p> <p>The Employment Lands Development Report 2010, (ELDP) found that the South West Subregion contains 14% of all employment lands in the Sydney Region. Campbelltown LGA contains 731 hectares of which Ingleburn has 318 hectares (39 hectares being undeveloped).</p>	<p><u>Employment</u></p> <p>Prairiewood has no employment lands and a commercial precinct that is held in one ownership (Stockland). Current employment opportunities are predominately within the Stockland Shopping Centre and the adjacent Fairfield and Braeside Hospitals.</p> <p><u>Mixed Use / Higher density Centres</u></p> <p>None at present. Fairfield City Council has produced a Prairiewood Town Centre Masterplan for the future development of a higher density mixed use centre. Currently</p>

⁹ Transport for NSW, NSW Long Term Master Plan (2012) p278

¹⁰ Ibid, p295

¹¹ DP&I (2013), Draft Metropolitan Strategy for Sydney p104

Draft Metropolitan Strategy Vision Criteria		Ingleburn	Prairiewood
		<p>The employment lands in Ingleburn are immediately west of the railway line (Denham Court) and south west (Bow Bowling). In addition to the employment land, there is the commercial / town centre precinct that is made up of numerous businesses and government services.</p> <p><u>Mixed Use/ Higher densities Centres</u></p> <p>Ingleburn town centre is a significant retail and services centre. The LEP allows mixed use development in the centre and residential flat building in adjacent areas.</p>	<p>however all residential land surrounding the centre is zoned R2 Low Density Residential</p>
2.	<p>Act as the major shopping, business and service centres for their surrounding area, usually with a full scale shopping mall, council offices, taller office and residential buildings, central community facilities, a civic square, cinemas, sporting facilities and significant parklands.</p>	<p>Ingleburn town centre is a shopping, business and service centre with the potential to grow. There is significant redevelopment occurring at present. A purpose built Centrelink Services Office has been provided along with the new multi-million dollar Greg Percival Library complex (cnr Cumberland Rd & Oxford Rd).</p> <p>Ingleburn has a major self-contained shopping centre (Ingleburn Fair), which is currently the subject of a redevelopment DA. There are also many individual shops in the centre.</p> <p>Government services include Centrelink, Youth and Community, Health and RMS.</p> <p>Ingleburn has a traditional grid pattern street layout, with strip mall shopping and public parklands nearby.</p>	<p>The Stockland Shopping Complex is a significant retail centre and serves the role of community hub for the surrounding suburbs. The centre contains a cinema complex. There are few offices.</p> <p>Fairfield Hospital is located near the centre. There are no development plans for expansion presently.</p> <p>Government service and specialist health service providers are located in either Liverpool or Fairfield.</p> <p>There is a Council Leisure Centre and a police station near the town centre.</p>
3.	<p>In many cases, are the focus for major institutions, principally serving immediate subregional residential populations on the public transport network.</p>	<p>Ingleburn contains the new Library, a Centrelink office. Institutions within 10 minutes by car, bus or train include Campbelltown Hospital (currently undergoing \$139 Million redevelopment), The University of Western Sydney (Campbelltown Campus) and TAFE.</p> <p>Ingleburn has the potential to accommodate major institutions nearby. Most institutions are located closer to Campbelltown.</p>	<p>Prairiewood is the location of Fairfield Public Hospital and Braeside Hospital and a small Disability Services Centre.</p> <p>The potential to accommodate any further large institutions is limited to the redevelopment of land, in the vicinity of the TWay station.</p>

Draft Metropolitan Strategy Vision Criteria		Ingleburn	Prairiewood
4.	Have a minimum of 8,000 jobs, with the potential for more than 12,000 jobs. Planned Major Centres have the capacity to achieve 8000 jobs within the timeframe of the Metropolitan Strategy (2031)	<p>The Bureau of Transport Statistics (BTS) website shows that in 2006 the employment (number of jobs) in the Ingleburn area was 5,807. This number includes only the immediate Ingleburn travel zones (TZ 1240, 1247, 1248, 1244, 1251). Denham Court TZ 1239) provided an additional 2,035 jobs and Bow Bowing (TZ 1246) an additional 1,868 jobs, making the total employment in Ingleburn around 10,409 jobs in 2006.</p> <p>The minimum 8,000 jobs target was already achieved in Ingleburn prior to 2006. There is probably the potential for 12,000 jobs for the centre and surrounds within the timeframe of the Metropolitan Strategy.</p> <p>Ingleburn has an established commercial/retail zone. There is capacity within the existing centre to supply mixed use higher density development to 4 storeys.</p>	<p>The BTS data on Prairiewood shows that in 2006 the total employment in the applicable TZ's was 2,386 jobs. This is only 30% of the Metropolitan Strategy target.</p> <p>A considerable proportion of these jobs are provided within the Stockland Shopping Centre, and the adjacent public and private hospitals.</p> <p>There is no employment land in Prairiewood. Employment land is provided in Wetherill Park and Smithfield, and not within walking distance of Prairiewood centre. Therefore, the only potential employment growth is through the realisation of the proposed future Town Centre Master Plan, to supply some commercial / retail spaces.</p> <p>In the immediate future, it is not clear how significant growth in employment would occur in the timeframe of the Metropolitan Strategy.</p>
5.	Typically have a capacity for around 9,000 to 28,000 dwellings.	<p>The Ingleburn Structure Plan (Campbelltown Council Draft Document) identified several areas immediately adjacent to the higher density commercial precinct, for mixed use high, medium and low density residential accommodation.</p> <p>The proximity of the Ingleburn Railway Station, in conjunction with the retail core makes the centre desirable for residential accommodation. The existence of the commercial core in addition to favourable land zoning for higher density accommodation will allow new dwellings to be provided in the foreseeable future.</p> <p>Campbelltown City Council identified that Ingleburn had 5,373 private dwellings in 2013, which was forecast to increase to 8,493 dwellings in 2031.¹² Additional densities, assisted by a Potential Major Centre designation in the Strategy, would allow the dwelling targets to be achieved.</p>	<p>The Prairiewood Town Centre Masterplan (2005) has identified the location for a future town centre with the potential to provide mixed-use development with 4, 6 and 8 storey higher density residential accommodation. The remainder of the adjacent lands remains low density dwellings.</p> <p>Fairfield City Council identified that Prairiewood had 962 private dwellings in 2013, which was forecast to increase to 1,230 dwellings in 2031.¹³</p> <p>It is unclear how the 9,000 dwellings target in the vicinity of Prairiewood could be achieved. Firstly, the proposed town centre does not provide the capacity for such a considerable number of dwellings. Secondly, significant additional dwelling numbers are not permissible without major changes to the existing LEP low density zonings.</p>

¹² <http://forecast2.id.com.au/Default.aspx?id=208&pg=5230>

¹³ <http://forecast2.id.com.au/Default.aspx?id=356&pg=5230>

Draft Metropolitan Strategy Vision Criteria		Ingleburn	Prairiewood
6.	Should retain a commercial core where this has demonstrated benefits. Mixed uses should be located around a commercial core and in some centres this may be a significant proportion of the centre. Residential development in the mixed use area can form an important element in revitalising the centre and provide for more housing choice.	<p>Ingleburn has a long established commercial / retail core.</p> <p>There is a commitment to the revitalisation of Ingleburn Centre by Campbelltown Council through the LEP. Provisions have been made to allow mixed use higher density and residential flat buildings in the vicinity of the commercial core.</p>	<p>Prairiewood has no commercial core, only a shopping centre and some dispersed services. There is no tradition of mixed uses in the centre.</p> <p>As mentioned previously, the provision of the mixed use centre remains a vision in the Prairiewood Masterplan.</p>
7.	Are divided into established, planned and potential Major Centres	<p>Ingleburn is defined as a Local Centre (Town Centre) in the Draft Metropolitan Strategy.</p> <p>Based on the comparisons being made with Prairiewood in this submission, Ingleburn sufficiently meets the criteria to also be identified as a Potential Major Centre.</p>	<p>Prairiewood is identified as a Potential Major Centre in the Draft Metropolitan Strategy for Sydney.</p>
Transport criteria Transport catchment: subregional			
8.	Linked to the metropolitan rail network directly or very high volume bus services	<p>Ingleburn railway station provides services on:</p> <ul style="list-style-type: none"> • Cumberland Line to Parramatta (48 mins) • South Line to Liverpool (14 mins) and Sydney via Granville, • East Hills Line to Sydney (50 mins) via the Airport (38 mins). 	<p>Prairiewood provides a Tway service to Parramatta and Liverpool Railway Stations. Journey times are 30 mins to Parramatta and 30 mins to Liverpool.</p>
9.	Focal point as a destination and origin for subregional public transport services (typically bus)	<p>Ingleburn Station is a focal point for the local bus services in the area.</p> <p>The station is located adjacent to the commercial/retail precinct.</p> <p>Interline Buses provide linkages north to Liverpool and south to Campbelltown and Campbelltown Hospital (Routes 870, 871 and 872).</p>	<p>Tway station stop at Prairiewood is used by two local bus routes. They are drop-off/ pick-up points rather than origin/destination, as the routes continue to Fairfield Station and Liverpool Station.</p> <p>Westbus provides services to Liverpool, Cabramatta and Fairfield Train Stations (Routes 816, 817 and 819).</p>
10.	Focal point of subregional arterial and collector road network	<p>All access to the Ingleburn commercial centre originates at Cumberland Road. This road forms the south-eastern boundary of the centre precinct.</p>	<p>Prairievale Road, Polding Street and Restwell Road are the main collectors surrounding Prairiewood.</p> <p>The Horsley Drive and Cowpasture Road, are more significant arterial</p>

Draft Metropolitan Strategy Vision Criteria		Ingleburn	Prairiewood
		<p>Traffic wanting to access the Hume Highway (to the north west) is restricted to one railway crossing located on Henderson Road (north of Ingleburn Station). Therefore traffic flows along Cumberland Road, Macquarie Road and Henderson Road through the Industrial area to Brooks Road and the Highway.</p> <p>The Draft Ingleburn Structure Plan 2006 identified the need to provide a second railway crossing to the south of the station to improve the traffic access (particularly for the heavy vehicles in the industrial area) and circulation around the town centre.</p>	<p>collectors that connect to the M4 and M5 respectively, and are located some distance away from the centre.</p>
11.	Freight access links with Sydney freight network	<p>The Draft NSW Long Term Transport Masterplan (2012) states that metropolitan intermodal terminals are critical to increasing the share of container freight moved by rail (p278). As a response, one of the actions in the Plan is to increase the share of freight transported by rail through the development of an efficient network of intermodal terminals.</p> <p>The Moorebank intermodal terminal (to the north-east of Ingleburn) precinct is proposed for development in the short to medium term.</p> <p>Ingleburn industrial area is strategically located to benefit from the proposed Moorebank precinct with access to the railway and Hume Highway.</p>	<p>The nearest existing corridors are:</p> <ul style="list-style-type: none"> • An east-west arterial (The Horsley Drive) which is located approximately 1.5km to the north. This link serves the Wetherill Park Industrial Area. • The Cumberland Highway which is located 2.5km to the east. This link serves north-south connections between the Parramatta and Liverpool areas.
Descript- ion	<p>Major Centres are the main shopping and business centres for their subregions. They also include residential development and other land uses within approximately 1km radius of the centre. The NSW Government has a strategic interest in the success of Major Centres as key structuring elements for Sydney and</p>	<p>Ingleburn commercial centre has the basic building blocks to allow the redevelopment of the centre into a contemporary commercial/retail and residential precinct.</p> <p>Its proximity to the railway network and access to local shops, services and employment opportunities increase the desirability for residential accommodation.</p> <p>Revitalisation projects have</p>	<p>The Prairiewood Town Centre Masterplan is a proposed future vision for the development of a commercial / retail centre that will include higher density housing.</p> <p>The (future) success of this centre is uncertain. It remains to be seen whether this development is realised, and subsequently becomes a focal point for subregional services.</p> <p>The Potential Major Centre designation may assist in this regard.</p>

Draft Metropolitan Strategy Vision Criteria	Ingleburn	Prairiewood
<p>as focal points for subregional services.</p> <p>Note: Most Major Centres in Sydney contain large retail complexes which from time to time will require upgrading. This cycle of upgrading presents opportunities to achieve better design outcomes for the retail complexes and for surrounding areas and streets.</p>	<p>commenced with the Centrelink Services building, the new Library Complex and the redevelopment proposal for Ingleburn Fair Shopping complex.</p> <p>Higher density residential developments are already been proposed and approved by Council.</p> <p>The Potential Major Centre designation would confirm the existing importance of the Ingleburn Centre, and create confidence for investors to further develop in this location.</p>	

With regard to many of the centres criteria, it is considered that Ingleburn either presently meets the criteria or is likely to meet the criteria in the future. Ingleburn particularly meets the Draft Metro Strategy benchmarks for employment and housing.

Ingleburn is a thriving commercial and retail centre accessible by public transport and adjacent to sub-regionally-significant employment lands. Urban consolidation and civic renewal projects have either been undertaken or are mooted. The provision of higher density housing has been supported by Campbelltown City Council, with potential for increases to current density allowances. Proposed new developments for apartment and townhouse/villa accommodation in walking distance to the commercial centre and transport have been recently approved.

Ingleburn provides industrial / employment lands in Sydney's south west. The area is located adjacent to the commercial centre, yet physically divided by the railway line. This area provides a considerable number of jobs and has the capacity to expand and supply numerous future jobs for this area. This is significant in view of its proximity to the proposed Moorebank Intermodal Terminal and the capacity for Ingleburn to accommodate businesses and activities related to freight.

Ingleburn is the only significant commercial centre between Liverpool and Campbelltown. This is certain to be the case for the foreseeable future, as the planned Major Centre at Leppington, and Town Centre at Edmondson Park are years away from completion.

Comparatively, Prairiewood Centre precinct is a vision contained within a Masterplan. This Plan clearly states:

Prairiewood was not conceived as a Town Centre. The relatively ample availability of space has seen the location of a shopping centre and a number of public facilities and institutions over several decades. Little thought was given to the way these facilities would relate to each other....¹⁴

It is our view that if Prairiewood, is considered to have 'Potential Major Centre' status in the Draft Metro Strategy, then Ingleburn equally deserves to be considered a 'Potential Major Centre'.

¹⁴ Fairfield City Council, *Prairiewood Town Centre Masterplan* (2005)

4.0 Conclusion

Ingleburn is a significant centre in the south western subregion of Sydney.

As detailed in this submission, the centre deserves to be recognised as a Potential Major Centre in the Draft Metro Strategy on the following grounds:

- Ingleburn exceeds the employment benchmarks, and is close to meeting the dwellings benchmarks, described in the strategy.
- Ingleburn has very good road and rail links.
- Ingleburn is the second largest centre in Campbelltown LGA, after the twin major centres of Campbelltown and Macarthur. It is the only significant commercial centre between Campbelltown and Liverpool.
- Ingleburn's proximity to the southern railway line and Hume Highway has resulted in a significant amount of industrial / employment land very close to the town centre. The centre therefore meets the strategy's criteria for freight access.
- The potential for Ingleburn to provide future centrally located higher density residential accommodation has been recognised in the Campbelltown LEP. Land use zoning allows mixed use and residential flat building development to four storeys. This has resulted in increased development interest and several urban consolidation and renewal projects have commenced or are the subject of development applications with Campbelltown Council.

The discussion in section 2 identifies how Ingleburn's current and further development would meet the objectives presented in the Draft Metro Strategy.

The above analysis in our view presents a strong case for Ingleburn to be designated a 'Potential Major Centre' in the final version of Sydney's Metropolitan Strategy.

The Metropolitan Strategy is important for sending the right investment signals to the development community. Ingleburn in many ways is a more suitable location for a major centre than, say, Prairiewood – one of only two potential major centres in the South West Subregion identified in the strategy. While it appears the strategy's designation for Prairiewood is in part driven by the desire to convert that centre's planning vision to a reality, the State Government cannot ignore other centres such as Ingleburn that meet, or are on the cusp of meeting, the strategy's major centre criteria.

Thank you for the opportunity to comment on the Draft Metro Strategy, and look forward to the Government seriously considering the proposals put forward in this submission.

Yours faithfully
GLN PLANNING PTY LTD



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