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30 October 2020

Ms Lindy Deitz
General Manager
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Email – council@campbelltown.nsw.gov.au

Dear Ms Deitz

Draft Campbelltown Employment Land Strategy

The Property Council of Australia welcomes the opportunity to provide comments to Campbelltown City Council on the draft Employment Land Strategy recently released for consultation.

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes. We are pleased to provide the attached comments for your consideration.

Council has prepared a comprehensive strategic review of its employment lands (retail, commercial and industrial) that respond to the regional and district planning framework, Council's Local Strategic Planning Statement and market conditions. The Strategy has addressed a number of important issues affecting its centres and developed a series of appropriate responses to be addressed in the short, medium and longer-term.

As a significant local government area situated within Greater Sydney's Western Parkland City, we fully support the Council's proposals to grow its local economy for the benefit of its residents.

Should you have any questions regarding the content of this submission please contact Troy Loveday, NSW Policy Manager, on 0414 265152 or tloveday@propertycouncil.com.au

Yours sincerely

A handwritten signature in black ink, appearing to read "Belinda Ngo".

Belinda Ngo
Acting NSW Executive Director
Property Council of Australia

Submission to Campbelltown City Council

Campbelltown Strategic Review of Employment Land

30 October 2020

1.0 General Comments

The Property Council welcomes the opportunity to provide comments to Campbelltown City Council (**the Council**) on its draft Employment Lands Strategy (**the Strategy**). We understand this has been prepared in response to Action 51 of the *Western City District Plan* and Action 11.1 of Council's *Local Strategic Planning Statement 2020* (LSPS).

The District Plan requires that Council complete this strategic review as a precondition to updating its local environmental plan. The Property Council supports Council undertaking this review.

The Greater Sydney Regional Plan identifies Campbelltown-Macarthur as one of four centres that together (as a cluster) will deliver metropolitan functions for the Western Parkland City. Campbelltown-Macarthur is also identified as a Health and Education Precinct within the Plan's centre hierarchy. The Strategy has reflected this approach.

Campbelltown LGA has a very diverse range of employment lands including health and education, retail, commercial and industrial zoned land occupying numerous centres and precincts. It is appropriate that the Strategy has given consideration to each of these employment sectors as part of its review.

2.0 Employment/Industrial Land

2.1 Industrial and Urban Services Land

The Western City District Plan has adopted a 'retain and manage' approach for industrial land within the City of Campbelltown. This requires all existing industrial and urban services land to be safeguarded from competing pressures, including residential and mixed-use zones. Council has satisfied this requirement, which is appropriate for the Western City District.

The Strategy indicates that the City's main employment areas are spread across nine employment precincts, occupying more than 770 hectares of land and approximately 2.9 million sqm of floor space. Notwithstanding this, Ingleburn and Minto are the dominant employment precincts within the LGA having 1.4 million and 0.9 million sqm of employment floor space respectively, primarily consisting of industrial land uses. The majority of Campbelltown LGA's industrial and employment precincts are large and have the benefit of significant scale to attract businesses and ensure they remain competitive.

The Campbelltown LGA employment precincts occupy one of the following zonings under *Campbelltown Local Environmental Plan 2015*:

- IN1 General Industrial
- IN2 Light Industrial
- B5 Business Development
- B7 Business Park
- plus, a small area of 4(b) Industrial land that has been deferred under a non-Standard Instrument LEP.

These zones allow for viable employment land uses to support the city's urban areas.

2.2 The Local Profile

Key statistics identified in the Strategy are:

- Population will increase from 156,713 in 2016 to 275,778 in 2036.¹
- 25% of residents have a university qualification (compared to 28% Greater Sydney)
- 21% have a trade qualification (compared to 15% Greater Sydney)
- 48% of local workers are residents
- 23% of local workers have a tertiary qualification.
- 34% of Campbelltown's resident workers were employed locally.
- 42,489 (62%) of Campbelltown's resident workers travel outside the LGA to work.
- Jobs to workers ratio in 2018/19 was 0.75
- Campbelltown's Gross Regional Product was \$7.27B for year ending June 2019.

2.3 Guiding Principles

Section 2.5 of the Strategy identifies six (6) guiding principles that it recommends should be considered when analysing and determining future employment land use requirements.

The guiding principles are:

- **People:** diverse opportunities for employment and learning
- **Land:** adequate, appropriate and long-term supply of land
- **Built form:** appropriate space that meets current and future needs
- **Infrastructure:** is aligned with current need and future growth
- **Economic:** a sustainable and productive long-term economy
- **Place:** attractive place of employment.

These are appropriate considerations to review and determine future employment land use requirements for the City of Campbelltown.

3.0 Business Centres

3.1 General comments

Section 3 of the Strategy considers the city's 39 business centres, which range from large commercial centres such as the Campbelltown CBD and regional shopping centre Macarthur Square to small neighbourhood shops. Combined these centres occupy 260 hectares of land and about 875,000m² of floor area.

The current planning controls under *Campbelltown Local Environmental Plan 2015* apply to these centres:

- B1 Neighbourhood Centre (97 hectares – 37% total centres)
- B2 Local Centre (51 hectares – 20% total centres)
- B3 Commercial Core (47 hectares – 18% total centres)
- B4 Mixed Use (59 hectares – 23% total centres)
- Plus, a small area of deferred land zoned 3(c) under a non-Standard LEP (4 hectares – 2%).

The Strategy does not appear to have involved any review of these zonings and the land uses permissible within each zone. Council should satisfy itself that the zoning of each of these centres is appropriate.

¹ We note that the NSW Government's projections for population growth for Campbelltown LGA are lower than outlined in this strategy (<https://www.planning.nsw.gov.au/Research-and-Demography/Population-projections/Projections>)

More than 24,000 jobs are associated with these centres, with the employment of 14,500 people at the Campbelltown-Macarthur centre. The remaining 9,500 are spread across the other 38 local centres.

3.2 Future Centres Demand

Section 3.5 of the Strategy analyses future demand and current supply for retail and office space across selected centres within the City.

Based on two scenarios modelled and considered within the Strategy, there will be demand for between 146,000m² and 228,728m² of retail floor area across the LGA by 2041. The current oversupply of retail floor area in the Campbelltown CBD will eventually be reversed with approximately 107,000m² of additional supply needed in coming years. It is important the Council consider where and how it wants that additional floor space to be provided. It is noted that there are actions within the Strategy that consider this issue.

The Strategy has modelled three scenarios for future demand for office space within the LGA. Each of the scenarios has forecast increased demand for office space between 120,000m² and 269,000m². The majority of this demand is located within the Campbelltown CBD with some additional demand in Glenfield.

Section 3.6 goes on to consider the capacity of existing centres. It has suggested Council consider introducing non-residential FSR planning mechanism for the centres of Campbelltown, Ingleburn, Macquarie Fields, Glenfield, Minto and Leumeah. Council must determine the most appropriate mechanism to deliver the future office space required. For Campbelltown CBD use of ground and first floor will not be sufficient and a 'commercial core' with a higher minimum non-residential component has been recommended. It is important that Council determine the most efficient planning requirements capable of delivering an adequate supply of office floor space into the future.

4.0 Strategies and actions

Section 2.7 of the Strategy sets out the important directions and actions to achieve its objectives relevant to employment (industrial) land. Section 3.8 of the Strategy sets out the important directions and actions to achieve its objectives relevant to business centres land.

The following table considers the strategies and actions and provides the views of the Property Council to each.

Employment Land Strategies and Actions	Property Council Response
<p><u>Strategy 1: Promote the competitive advantage of Campbelltown LGA</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Implement the actions identified in the <i>Campbelltown Economic Development Strategy</i> that promote investment and employment opportunities in the LGA. - Work closely with large industrial proponents to identify and address expectations to bring supply online quickly and enhance development interest. - Seek to reinforce a competitive advantage and the economic significance of Ingleburn and Minto industrial precincts by enabling the opportunity for 24/7 operation, where unlikely to affect the amenity of sensitive receivers. 	<p>The Property Council supports this strategy and the implementation of these three (3) associated actions.</p> <p>In particular, we would support Council working closely with large industrial proponents to bring forward the supply of industrial land.</p>
<p><u>Strategy 2: Deliver a sustainable pipeline of land for employment precincts</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Advise State Government of findings of this study and the anticipated shortage of land for employment precincts. Request that they consider opportunities for employment precincts during any future Greater Macarthur Structure Plan amendments. - Explore opportunities to enter into public-private partnerships, for early infrastructure delivery, with developers that are seeking to deliver new employment lands (particularly IN1 General Industrial, IN2 Light Industrial or B5 Business Development). Upfront infrastructure delivery may bring more employment land on the market quickly. - Consider working with the State Government to develop and publish a priority infrastructure delivery program that identifies the locations that will be the focus of infrastructure planning and delivery and the anticipated timeframes. Locations that can deliver a greater number of jobs and economic contribution should be prioritised first. - Review contribution plans to capture the costs of infrastructure improvement works and community facilities in employment precincts. - As a priority, investigate 'urban capable' land in South Campbelltown to accommodate a diversity of industrial, urban service and specialised retail land. Locations closer to the Hume Highway are the most appropriate for employment precincts. 	<p>The Property Council supports this strategy and the five (5) associated actions.</p> <p>In particular, the actions aimed at accelerating the supply of suitably serviced industrial land as amendments to the Greater Macarthur Structure Plan are appropriate and welcomed.</p> <p>Council should ensure that industry stakeholders and landowners are consulted in respect of the action relating to the review of contribution plans.</p>

Employment Land Strategies and Actions (Continued)	Property Council Response
<p><u>Strategy 3: Increase the capacity of existing employment precincts</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Consider removing building height controls from the industrial precinct and protecting the character and sightlines through specific provisions in the DCP, if required. This would enable new forms of industrial development, such as multi-storey and high-bay warehousing, and design solutions to be achieved. - Consider amending the DCP to add greater flexibility around parking rates by applying a merit-based assessment rather than hypothetical future uses assessment. Strict numerical controls (eg 1 space per 300sqm of warehouse) should be set aside in favour of an assessment of average staff and visitor requirements of similar types of development. This information could be provided as part of a development specific traffic impact assessment. - To provide more flexibility for employment uses in the IN2 Light Industrial and B5 Business Development zone, consider amending the approach to the Local Environmental Plan land-use tables to be open rather than closed. For example, listing prohibited uses and then enabling other uses to be permitted with consent. - Strict numerical controls relating to setbacks should be reviewed to encourage: <ol style="list-style-type: none"> 1. Small setbacks that provide meaningful landscaping that contributes to the urban canopy 2. Pedestrian access and amenity, particularly in areas close to train stations such as Minto, Campbelltown, Leumeah and Ingleburn. 	<p>The Property Council supports this strategy and the four (4) associated actions.</p> <p>In particular, the actions that provide greater flexibility for industrial development and overcome unnecessary obstacles (such as building height controls where they do not serve a good planning purpose).</p> <p>The intention to provide greater flexibility in IN2 Light Industrial and B5 Business development zones with open land-use tables is an appropriate reform and one which we fully support.</p>

Employment Land Strategies and Actions (Continued)	Property Council Response
<p><u>Strategy 4: Retain employment precincts along the Glenfield to Macarthur Renewal Corridor at Ingleburn, Minto and Campbelltown.</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Noting the sufficient residential capacity identified in the <i>Campbelltown Local Housing Strategy 2020</i>, existing employment zones at Minto, Ingleburn and Campbelltown should be protected from residential development. - Postpone rezoning of employment precincts until the renewal of eastern centres has come to fruition, and there is adequate demand to support the rezoning to align with the Glenfield to Macarthur Land Use and Infrastructure Implementation Plan. In particular, industrial areas around Ingleburn and Minto should be protected. A future review of these areas can be undertaken once residential supply on the eastern side of the railway has been established, and a future employment land review is conducted. 	<p>The Property Council supports this strategy and the two (2) associated actions.</p> <p>In particular, the protection of industrial and employment precincts at Ingleburn and Minto which make a significant contribution to the employment targets of the City and Western City District.</p>
<p><u>Strategy 5: Define a clear future role and function of Maryfields.</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Consider potentially investigating and attracting a developer to deliver a similar product outcome to that achieved at Habitat Byron. This would be a 'point of difference' product type that could appeal to new businesses and encourage home-based businesses to move to an employment precinct. It would provide a low rise – workshop/office and SOHO living product. The intent of the product is not to incorporate retail uses, rather than a mix of creative and business uses that do not compete with the nearby centres. An employment component must be attached to each dwelling. - Investigate a partnership and potentially seek a grant to develop a state-of-the-art innovation and research centre within the B7 Business Park precinct. 	<p>The Property Council supports this strategy and the two (2) associated actions.</p> <p>We encourage Council to work closely and engage with industry to use its knowledge and ideas to inform its decision-making regarding this site.</p>

Employment Land Strategies and Actions (Continued)	Property Council Response
<p><u>Strategy 6: Define a clear future role and function for the Deferred Matter Land at Campbelltown.</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Investigate the three land use options for the deferred-matter land at Campbelltown as follows: <p><i>Option 1 – High Amenity Business Tech Park:</i> A B7 Business Park zone would enable the site to be transitioned and deliver commercial employment uses in a high amenity environment. This zone would be complimentary to the CBD and would enable a mix of uses including business and office premises, light industries and small bars and pubs. Specialised retail and residential would not be permissible within the area. There is a risk that a B7 Business Park would detract from potential office space being delivered in the city centre, as there is insufficient demand in the shorter term for both sides to deliver offices. A mix of uses including light industries would however be an appropriate outcome.</p> <p><i>Option 2 – Extension of Large Format Retail:</i> Blaxland Road is immediately to the north-east of the identified land and is zoned B5 Business Development. Considering the substantial population growth anticipated in the LGA, there is demand for additional large format retail. The land would become a natural extension of Blaxland Road and could provide a mix of warehouse uses, specialised large format retail and light industries. This zone would prevent office premises and residential development being delivered.</p> <p><i>Option 3 – Light Industrial function:</i> As part of the Campbelltown LEP Review, the land has been rezoned for light industrial uses in line with LEP 2002 4(b) Industrial Zone. While there is considerable demand for industrial land in the LGA, an industrial use for the site would not be consistent with the long-term direction set out in the Reimaging Campbelltown 2020. The proposed zone would assist in addressing the current shortage of industrial land in the LGA.</p>	<p>The Property Council supports this strategy and looks forward to the outcome of Council's investigations regarding this precinct.</p>

Employment Land Strategies and Actions (Continued)	Property Council Response
<p><u>Strategy 7: Explore synergies with the local TAFE and universities to develop training and education programs targeted to local industries.</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Encourage more universities or university outposts to establish in Campbelltown, either in a cluster with WSU or in the Campbelltown CBD. - Review Council's community assets to determine the opportunity to provide training spaces for utilisation by businesses, universities and TAFE to run training courses. - Work with TAFE and universities to undertake meaningful engagement with local industries to determine the gap in employment skill sets and tailor training courses to suit. 	<p>The Property Council supports this strategy and the three (3) associated actions.</p> <p>In particular, we endorse Council working closely with the tertiary education sector to develop a stronger education precinct within the Campbelltown-Macarthur centre.</p>
<p><u>Strategy 8: Encourage agglomeration and clustering</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Actively support and market, through Council's website and collateral, the food processing and distribution cluster opportunity, including provision for large dark stores that are well positioned to distribute to Greater Sydney, Canberra and the south coast. - Undertake research, explore and invest in opportunities for industrial symbiosis – where the waste or by-products from one business is used as a raw material for another to alleviate costs and encourage more sustainable production. 	<p>The Property Council supports this strategy and the two (2) associated actions.</p> <p>In particular, we agree with the Council's focus on opportunities within the food processing and distribution cluster.</p>
<p><u>Strategy 9: Facilitate greater collaboration and alliances between industry and businesses</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Seek to facilitate and encourage a business support program that aims to foster collaboration and connection between industry and business including identifying and providing education pathways and job placements. - Explore opportunities to establish an alliance for the transport and logistics and manufacturing industries to strengthen supply chain synergies and collaboration opportunities. 	<p>The Property Council supports this strategy and the two (2) associated actions, which are appropriate responses to the City's strong transport and logistics sector.</p>

Employment Land Strategies and Actions (Continued)	Property Council Response
<p><u>Strategy 10: Deliver better places of employment</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Support businesses and workers by ensuring the planning framework encourages: 1. The retention of convenience retail uses (for example shop, kiosk, take-away food and drink) as permissible and limit the size of these uses as detailed in Clause 5.4 of CLEP 2015. 2. A pleasant location for people to rest or interact with others during the working day. 3. Improved connectivity to surrounding open space (relax during breaks). 	<p>The Property Council supports this strategy and the associated action regarding provision of amenities to support businesses and workers.</p>
<p><u>Strategy 11: Protect the role and functions of employment lands</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - The future role, function and strategic positioning of employment land within the LGA is described in Table 5. 	<p>The Property Council supports this strategy and the associated action regarding the City's main employment precincts.</p>

Business Centres Strategies and Actions	Property Council Response
<p><u>Strategy 1: Establish and reinforce a clear centre hierarchy across the LGA</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Based on findings in the Background Report, and to better conform to the Greater Sydney Commission's commercial centre classifications, consider adopting the proposed hierarchy outlined below and in Table 11 and Figure 10. - Council should consider the economic impacts of planning proposals and development applications on the proposed commercial hierarchy. 	<p>The Property Council supports the creation of a hierarchy of centres for the Campbelltown LGA.</p>
<p><u>Strategy 2: Prioritise the growth and renewal of Campbelltown-Macarthur metropolitan cluster.</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Prioritise shorter term development in Campbelltown City Centre (eastern side), rather than in the Macarthur area, particularly when it is associated with additional residential, retail or office space. - Consider amending the existing Campbelltown LEP standards (ie minimum non-residential FSR or number of commercial storeys) to increase the number of non-residential floors in the Campbelltown CBD in line with <i>Reimagining Campbelltown City Centre Masterplan</i>. - Implement the priorities and directions outlined in the <i>Reimagining Campbelltown City Centre Masterplan</i> and the Campbelltown Macarthur Place Strategy including actions to improve connectivity, rationalise landspace taken for car parking and build on the centre's anchors. - Trial temporary re-purposing the Campbelltown Council Hurley Street car park to become a market square or park that can be utilised for: <ul style="list-style-type: none"> (a) Night-time market installations (b) Public domain (park) (c) Entertainment spaces (d) Weekend markets (e) Public art, street furniture and wayfinding outcomes 	<p>The Property Councils this strategy and the seven (7) associated actions.</p> <p>Actions intended to strengthen the economic potential and vibrancy of the Campbelltown CBD are supported and should be implemented to deliver much needed support growth to the CBD's retail and service-focused businesses.</p> <p>We support initiatives aimed at increasing the number of residents living in close proximity to the retail and commercial heart of Campbelltown to stimulate activation and vibrancy.</p>

Business Centres Strategies and Actions (Continued)	Property Council Response
<p>Attract new businesses to the city centre in accordance with use and activity clusters identified in <i>Reimagining Campbelltown City Centre Masterplan</i> and the Economic Development Strategy. These clusters may include the:</p> <ul style="list-style-type: none"> (a) Commercial core, (b) Justice Precinct, (c) City Centre living, (d) Health, knowledge and innovation precinct, (e) Cultural precinct. <ul style="list-style-type: none"> - Improve the appeal and identity of the centre to become a destination: <ul style="list-style-type: none"> (a) Consider opportunities for street and public art in the main street and at the entrance locations to create a sense of arrival (b) Encourage public events and activities that bring families and friends into the centre such as 'Art in the city', 'street fairs', markets, etc (c) Explore opportunities for pop-up activations in vacant tenancies to enhance activation and provide affordable space for new businesses. (d) Investigate a building improvement project that encourages shop front renewal. - To support centre vitality, explore opportunities to increase residential and worker density within the walkable catchment: <ul style="list-style-type: none"> (a) Consider allowing a greater density of residential and office space within the walkable catchment to support centre activation (b) Provision for a mix of housing to cater for a diversity of age groups and incomes (c) Consider investigating incentives to achieve affordable, key worker and student housing in the centre 	

Business Centres Strategies and Actions (Continued)	Property Council Response
<ul style="list-style-type: none"> (d) As an option, investigate rezoning northern end of Campbelltown to R4 High Density Residential to assist in consolidating the centre or alternatively, in the B4 Mixed Use zone enable a greater diversity of ground floor uses such as light industry and specialist retail, which currently do not qualify under the 'shop top housing' use. (e) Explore the potential to continue the R3 zone between Apex Park and Campbelltown Public School, north of Lindsay Street to provide more opportunity for infill residential development. (f) Consider undertaking feasibility testing to determine if the current building height controls are feasible to incentivise development or if they are instead encouraging land banking. Land banking occurs when the planning controls are at a scale where demand insufficient to meet the controls and there is a hesitation to deliver an outcome less than what the controls enable as it would not be viable to redevelop in the future. Developers instead hold on to the property until the market has caught up. 	

Business Centres Strategies and Actions (Continued)	Property Council Response
<p><u>Strategy 3: Support the renewal of the transit-oriented local centres to work towards achieving the vision of the Glenfield to Macarthur Urban Renewal Corridor Strategy.</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - To reiterate the commercial hierarchy and support the revitalisation of the Campbelltown-Macarthur and Leumeah, consider prioritising the renewal of existing centres on the eastern side of the rail line before transitioning industrial land to higher order residential and business uses. This will enable the ongoing use of the western precincts for industrial purposes in the short to medium-term. It would also support more sustainable take-up and viability than over expanding the centres too quickly. - Consider rezoning the centres at the Minto and Leumeah rail stations B4 Mixed Use to enhance the viability of the centres and increase residential density within their walkable catchment. - Consider undertaking design and feasibility testing to prioritise increasing the density of existing centres rather than rezoning and expanding the centres. This should consider the possibility of incorporating a minimum non-residential FSR provision to secure longer-term commercial floor space. Controls could include investigating: <ul style="list-style-type: none"> (a) At least two storeys of commercial floorspace for properties fronting the main street and/or rail line interface. (b) A minimum non-residential FSR of 0.5:1 for properties in the centre frame areas. - Investigate a potential main street connection with cycleway and street trees along Redfern Road to improve the connection from the rail station. In the longer term, consider the opportunity of extending commercial uses along the main street interface to connect the Minto station centre to Minto Marketplace and enhance passive surveillance over the street and public recreation facilities. - To support the forecast growth at Macquarie Fields, investigate a new mixed-use centre at the rail station to support local convenience uses. - Continue to conditionally support the master planning process associated with the Glenfield Urban Renewal Area. 	<p>The Property Council supports this strategy and the five (5) associated actions.</p> <p>In particular, we are supportive of strategically applying principles of Transport Oriented Development (TOD) that lead to compact, sustainable development along main transport routes. Clearly outlining areas of growth and land release with appropriate planning controls (like rezoning of industrial areas for new housing as foreshadowed) provides incentives to develop, and facilitates diversity of housing supply and densification needed by creating certainty to investors for both housing and commercial development.</p> <p>New developments within centres should aim, where possible, to provide appropriate commercial floor space, designed with flexibility in mind so that a variety of commercial uses could occupy the space.</p>

Business Centres Strategies and Actions (Continued)	Property Council Response
<p><u>Strategy 4: Enhance the vibrancy and integration of local centres</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Consider developing a place-based strategy for local centres that aims to partner with the shopping centre owners with a vision to incentivise restructuring centres rather than only implementing design treatments. This could include: <ul style="list-style-type: none"> (a) Incorporating higher density shop-top housing; (b) Encouraging the restructuring of standalone centres to incorporate a 'main/eat street' concept that acts as a more active interface for uses such as outdoor dining. This would require reconfiguring existing carparking and opening up the side interface of the existing shopping centre. - Subject to design and feasibility testing as part of the place-based approach, consider increasing the building height in local centres to incentivise redevelopment. - Where possible, community facilities should be integrated in centres rather than on stand-alone sites, this can increase passing trade and visitation numbers for local businesses. - Consider the opportunity to integrate higher density residential in and around local centres. This could include the opportunity for residential development to be delivered above car parking for the centre. - Consider undertaking a pedestrian and cycle study that explores opportunities and priorities to: <ul style="list-style-type: none"> (a) Identify safe connections within the walkable catchment of centres, (b) Enhance the walkability of catchments through cosmetic treatments, (c) Incorporate wayfinding elements for strategic connections. - Encourage new local centres to be designed as 'main street' concepts that have more desirable interfaces and sense of place. Creating informal spaces for people to meet and chat can enhance community vitality and belonging. New shopping centres should be encouraged to be delivered in a way that integrates with the street. - Consider the role and function of the new centre in relation to the existing centre at Claymore. While there is additional demand for around 12,000m², this could either be distributed evenly across both centres or consolidated in one centre to enable larger supermarket and specialty retail provision. A specific economic impact assessment should be undertaken to determine the implications of these options. 	<p>The Property Council supports this strategy and the seven (7) associated actions.</p> <p>We welcome moves to improve the viability and attractiveness of local centres through both planning controls and urban design initiatives. Sites adjacent to local centres should be encouraged to redevelop to increase density and provide greater diversity of housing types.</p> <p>Council and other agencies should develop place-based planning controls that align to the characteristics of a site or precinct and deliver an optimal economic and urban design outcome.</p>

Business Centres Strategies and Actions (Continued)	Property Council Response
<p><u>Strategy 5: Seek to provide clearer direction for B1 Neighbourhood centres adjoining education uses</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - In consultation with the State Government, consider exploring the possibility of rezoning school sites to a more appropriate zone that reflects the use, as part of the LEP review process, - For centres that adjoin school sites, seek to: (a) locate community facilities, such as libraries and halls, in adjoining centres to keep people in the centres longer and enhance passing trade and (b) enhance the connection or interface with the school to create safe environments and enhance passing trade opportunity. - To enhance the economic viability of centres, consider increasing residential density within a walkable catchment. 	<p>The Property Council supports this strategy and the three (3) associated actions.</p> <p>These actions are appropriate and should be discussed with State agencies to ensure that there is early agreement on Council's proposals.</p>
<p><u>Strategy 6: Neighbourhood Centres</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> - Investigate opportunities to locate smart business hubs in neighbourhood centres to support home-based businesses and encourage greater visitation of centres. - Explore opportunities for pop-up activations in vacant tenancies to enhance activation and provide affordable space for new businesses. - As part of the structure planning process for the Greater Macarthur area, opportunities have been identified for three new larger local centres at Menangle Park, North Gilead and South Gilead. Demand modelling indicates that additional smaller neighbourhood centres should also be considered to provide convenience services within a walkable catchment of new residents. Investigate the opportunity for additional smaller neighbourhood centres in this area. - Investigate a building improvement project that encourages shop front renewal. - Consider investigating alterations to building height controls to encourage the revitalisation of neighbourhood centres and the opportunity to deliver greater residential density through shop-top housing outcomes. - Explore the opportunity for a new B1 Neighbourhood Centre to provide convenience retail uses for the St Helens Park community. - Consider enabling home occupation and home business and permissible uses within the zone. 	<p>The Property Councils supports this strategy and the seven (7) associated actions.</p> <p>In particular, the focus on encouraging activation and visitation of the city's neighbourhood centres by local residents.</p>