

5 March 2013

Mr. David Fitzgibbon
Precinct Project Manager
Strategies & Land Release
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

E: david.fitzgibbon@planning.nsw.gov.au

Dear David,

Re: Marsden Park – Response to submissions

This memorandum has been prepared for the NSW Department of Planning and Infrastructure (DPI) in response to submissions received as part of the public exhibition process for the precinct planning of the Marsden Park release area.

MacroPlan Dimasi has been asked to review two submissions from:

- BBC Consulting Planners & Location IQ – on behalf of GPT, owners of Rouse Hill Town Centre;
- Brown Consulting – on behalf of Burton Property (NSW).

Our comments in relation to matters raised are provided below.

1. BBC Consultant Planners & Location IQ (on behalf of the GPT Group)

Location IQ makes the following claims within its submission and we have responded to each of them in kind:

Centre Size and Controls

- Location IQ considers MacroPlan Dimasi's estimates of supportable retail floorspace within the Marsden Park precinct to be appropriate. It supports a provision of retail floorspace up to 30,000 sq.m, and supporting commercial floorspace of about 10,000 sq.m.
- Location IQ question the inconsistency of the above recommendation with the final recommended mix in the draft ILP, which indicates a provision of up to 50,000 sq.m of retail and commercial floorspace combined. We do not disagree with this recommended guide of floorspace. There is a possibility that future rail connections to Marsden Park might be developed – which would result in a larger centre being supported. Planning for such development requires flexibility and the precinct plan can be reviewed in the medium term, after five years to ensure the appropriateness of such a provision.

- The average size of double dds centres across Australia is about 35,000-37,000 sq.m.
- Location IQ suggests 2 x dds' would not be supported by the Marsden Park population. Typical benchmarks indicate that one dds is supportable for a population of 30-35,000 persons. The trade area estimated by MacroPlan Dimasi is expected to exceed 60,000 persons by 2026, and thus 2 x dds stores may indeed be supportable at the centre.
- Location IQ suggests retail floorspace be capped at around 30,000 sq.m – in line with the recommended provision in the MacroPlan Dimasi report. We do not consider retail floorspace caps to be appropriate, as they reduce flexibility and are anti-competitive. The Rouse Hill Town Centre is the key centre in the region, planned to be a major centre, with up to 200,000 sq.m of retail and commercial floorspace. We do not consider the role of this centre will be jeopardised by the proposed allocation of floor space for Marsden Park, even if Marsden Park evolves to accommodate 2 x dds'.
- Allowing maximum flexibility while controlling scale through zone objectives and the amount of area zoned is considered the most appropriate mechanism by which to plan for a centre. Retail development tends to be developed once sufficient market demand exists and early provision, i.e. ahead of a theoretical 'support level' would be of benefit to residents in the growth areas and would serve to attract new residents to the region.
- Location IQ has also questioned the appropriateness of the B4 zone along Richmond Road given its use at other nearby major centres. This zone allows a mix of uses including retail, residential and/or commercial uses and is not tied in its application to major centres only. The zone is appropriate and supports the Marsden Park town centre.

Timing

- Location IQ do not raise concern with respect to the indicative timing of the first stage of the Marsden Park town centre, if it were to only include a full-line supermarket and supporting specialties.
- Location IQ suggests further information should be provided in relation to the likely timing of future stages of the town centre and its potential impacts on Rouse Hill. Location IQ suggests that if retail facilities were provided too early, the centre would rely on trade from a larger region, than if it were provided in-line with market demand.
- The extent of a retail centre's trade area is a function of the provision at the site and surrounding competition which, in this case, will not change. The function of Rouse Hill as a regional centre will not be compromised by Marsden Park.

- We do not see it likely that a retail shopping centre will be provided significantly ahead of schedule in Marsden Park, and in the early stages we expect convenience oriented retail facilities to be provided.
- We expect at least 5-10 years before a dds is likely to be developed at Marsden Park, by which time Rouse Hill town centre is likely to have undergone a stage 2 expansion.
- As a regional centre, Rouse Hill will benefit from all future residential growth in the NWGC. We do not believe it is necessary to control the rate of development at a planned centre as this is typically dictated by market circumstances. It has always been intended that a range of sub-regional and neighbourhood centres would be distributed across the NWGC. The town centre at Marsden Park is one of these planned centres.

Business / Industrial Land

- Location IQ suggests that specific controls be included in the Marsden park precinct plan to prohibit large format retailers such as Costco and factory outlets. Our report did not provide recommendations in regards to Marsden Park Industrial Precinct (MPIP). We understand that MPIP is planned to accommodate significant business park type development and industrial development as well as bulky goods floorspace.
- We note that some major tenants have purchased land in this precinct, as it is very accessible for much of western metropolitan Sydney, given its proximity to the M2/M7, and relative distance to the M4. We expect this precinct will become a significant bulky goods and large format retail node, similar to Alexandria, Penrith (Mulgoa Road) and Auburn in scale and trade area influence.
- In this regard, we would consider the location would be quite desirable for the likes of Costco and outlet retailing – which rely on significant catchments and regional accessibility. We do not consider that these types of users should be prevented from locating in MPIP or indeed form MPP. In fact, there is a distinct lack of such facilities in northern Sydney.

Mixed Use Zone

- Location IQ raise concerns with the large mixed use zoned proposed to the east of Richmond Road, stating that such a zoning would allow retail development. They recommend that certain large format retail uses be excluded from this area, in particular supermarkets, discount department stores and the like.

- Our view is that large format retail development ought to be encouraged both within and close to the main centre so that the market can flexibly deliver this retail form. Given the location of the Richmond Road strip so close to the town centre and to planned transport services it would also be expected that this land should allow for residential development. The alternate B5 zone would still allow large format retailing but would typically preclude residential development.
- Controlling the scale of retail development in this precinct through prohibition of uses is considered to reduce flexibility, and defeat the purpose of the zone, which is to allow a mix of uses.

Neighbourhood Shops

- BBC has raised concern over the lack of guidance around neighbourhood shops throughout the residential zone, and that there is a risk that the Marsden Park town centre will need to be larger than planned to be competitive with these smaller shops.
- We do not consider that there is market sense or planning merit in limiting the size of shops in the neighbourhood zones, provided potential occupants serve a convenience need. The type of retail service provided is already suitably restricted by the definition of a 'neighbourhood shop'.

2. Brown Consulting (on behalf of the Burton Property)

Brown Consulting makes the following comments in its submission. Our response is provided in kind:

Connectivity & Road Design

- Brown argue that there is a lack of connection between Marsden Park Industrial Precinct and Marsden Park Precinct, stating that intersection treatment of the collector road and South Street and the sub-arterial road in the Marsden Park Industrial Precinct and South Street is not an appropriately designed intersection in terms of the functionality and that the collector road should incorporate stormwater management features, such as drainage swales rather than a separate drainage channel and road.
- These concerns are more of an engineering nature than economics but road design and the effectiveness of connectivity to the adjacent MPIP will have a bearing on the success of the town centre. We presume the deviation of the connector road around the waste disposal site on Grange Avenue is to avoid any construction difficulties or destabilising of the 'tip' site, otherwise it is usually standard practice for such roads to 'straddle' lot boundaries. We note

also that the precinct plan designates several internal roads for the town centre which may have the effect of carving up land into small parcels. We would suggest that this level of planning detail be left to the development stage or provided on an indicative basis only.

- A bigger concern for the success of the town centre lies in the uncertainty of the alignment for the Marsden Park rail extension. Its current proposed alignment adjacent to South Street could be to the detriment of connectivity between Marsden Park and MPIP, unless an underground provision was intended.
- Brown also argue that the proposed zoning of the Burton land and its arrangement is an inefficient use of the site (especially the proposed community use land which they argue should be located on the adjoining sporting fields) and that the zoning and densities should be in accordance with the property boundaries.
- In our community facilities and open space report we noted that:

“... the waste services depot at Grange Avenue is intended to be utilised for district level provision of sporting and community services for MPP. This site is also identified in Council’s draft S94 plan for the adjacent Marsden Park Industrial Precinct as one of two potential Community Resources and Recreation Hubs (CRRHs). It is also understood, however, that an independent investigation regarding the appropriateness of the waste disposal site is being undertaken for Council and that any acceptance of this site is dependent on that report’s findings. Obviously alternate sites would need to be identified should the waste disposal site be found to be unsuitable for open space or community facility purposes.
- Our report found that:

“... the provision of district level facilities are required to service a population of 29,000 persons and that these are planned to be provided as part of a primary Community Resources and Recreation Hub (CRRH) located on the waste services depot site at Grange Avenue. This could be expected to include the co-location of the following facilities:

 - *4 double sport fields;*
 - *1 aquatics centre;*
 - *An indoor sports centre; and*
 - *8 hard courts, including 4 tennis courts and 4 basketball courts.”*
- We understand that the size of the waste disposal site is sufficient to accommodate the above facilities. As previously stated, however, we are not privy to information regarding the suitability of the waste site for construction purposes. There are obvious spatial and financial savings to be achieved if the aquatic centre was co-located on this land as part of the integrated CRRH. The proposed location should therefore be further considered in the making of the final precinct plan. If co-location as part of the CRRH is not possible, then a location such as the Burton site selected would allow for the sharing of the facility between MPP and MPIP and for its utilisation by town centre workers.

- Should the aquatic centre be able to be accommodated on the CRRH site then an alternate mixed use or higher density residential zone would be suited to this part of the Burton land.
- We agree also with Brown's suggestion that it is preferable for zonings to follow property boundaries, thus avoiding the sliver of medium density zoning at the western perimeter of the Burton site.

Should the Department require clarification about any aspect of this advice please do not hesitate to contact our office.

Regards,



Wayne Gersbach
General Manager - NSW