

22 June 2007

Growth Centres Commission
Mr. Angus Dawson
PO Box 1457
PARRAMATTA
NSW 2124



Dear Sir

Exhibition of Oran Park and Turner Road Precincts

UDIA NSW commends the Growth Centres Commission (GCC) and Camden Council on expediting the rezoning process for the first Growth Centres precincts. The precedent established by Oran Park and Turner Road provides encouragement for the development industry for the efficient creation of new communities in the North West and South West sectors.

UDIA NSW has reviewed the exhibition material with the assistance of our Metropolitan Land Release Committee and we believe we can offer practical and insightful observations and solutions to assist the GCC and Camden Council in realising appropriate development controls for both the Oran Park and Turner Road precincts.

The purpose of our submission is not to review the exhibition material in precise detail. The comments provided are of a deliberately broad nature and are intended to facilitate the Government's goal of delivering residential, employment and commercial land to the market to stimulate the creation of new communities.

Precinct Boundaries

It is apparent from the configuration of the precinct boundaries in the Oran Park and Turner Road Indicative Layout Plans that the current boundaries that form part of the Growth Centres SEPP are in many places inaccurate in terms of applicability to landform characteristics, and in other places introduce inefficient and impractical urban footprints, which do not facilitate release of land. For example UDIA NSW notes the curious configuration of the Oran Park Precinct Boundary in its north-west corner, and query the ability of the residential and open space zoned land in this part to be efficiently served by infrastructure and public transport, and linked by roads.

RECOMMENDATION

The Growth Centres Commission, using the lessons learnt with the Oran Park Precinct boundaries, take the opportunity to review the boundaries of all precincts in the South West and North West Growth Centres, prior to embarking on subsequent precinct planning, in order to avoid these anomalies in the future.

Development Densities

UDIA NSW notes in both Indicative Layout Plans, large areas assigned for medium density residential development, particularly in the Oran Park Precinct surrounding the Oran Park Town Centre. UDIA NSW maintains its concern with respect to the market acceptance of these densities and we fear that, while lot production and land supply is increasing, the industry will be delivering a product that the market will be reluctant to accept. As you will be aware, UDIA NSW raised concerns in relation to development densities in its submission, *Managing the Growth Centres 2005*, and takes the opportunity to reiterate this concern.

RECOMMENDATION

The Growth Centres Commission take the opportunity, while residential lot sales are comparatively subdued in western Sydney, to identify a process which may enable residential lands to be downzoned in the future (together with strategies to address the resulting implications in terms of infrastructure servicing and delivery of new roads and public transport) if this action is found to be necessary in order to improve lot sales and dwelling construction.

Retail and Commercial Hierarchies

On review of the Draft DCP and SEPP requirements, together with the “*Final Report – Employment Land Study*” (Macroplan March 2007), UDIA NSW senses that the retail and commercial hierarchy within the South West Growth Centre, and within the Camden LGA, may not be fully resolved.

For example UDIA NSW notes:

- A contradiction within the Draft Turner Road DCP and the Employment Land Study in terms of provision of bulky goods floorspace in Turner Road. The study cautions against this action; however the DCP supports 25,000 sqm of bulky goods floorspace;
- The Employment Land Study variously describes the Oran Park Town Centre as either a local centre, or a centre with a regional function, leading us to question its position in the retail and commercial hierarchy, particularly with regard to the promotion of the Leppington Town Centre and the protection of the retail and commercial function of the existing Narellan Centre;
- The Employment Land Study goes so far as to suggest that the GCC should adopt a flexible position in its support of the Leppington Centre in favour of an expanded role for Oran Park, should Leppington be delayed.; and
- The Employment Land Study is silent on the role and function of the retailing and bulky goods floorspace in the Turner Road precinct, particularly with respect to other planned centres identified in the South West Structure Plan, and the existing neighbouring centre at Narellan.

UDIA NSW advocates that in the interests of orderly and proper planning, the GCC should resist suggestions to abandon its promotion of Leppington as the primary Centre for the region in favour of Oran Park (and / or any other Centre) if Leppington is delayed.

Leppington, notwithstanding its current isolated position, will in the long term be the most important centre in the area due to its central location and the rail based public transport access that it will offer. Any expansion of another centre in the short term will only cannibalise the potential for Leppington to develop as a strong mixed use regional centre and should be avoided.

RECOMMENDATION

The Growth Centres Commission take the opportunity to undertake a comprehensive review of the retail and commercial hierarchies in both Growth Centres in the near future to ensure that future precinct planning does not generate the same uncertainties and concerns that have become evident in Oran Park and Turner Road.

Development Yield

UDIA NSW notes that the proposed yields in both the Oran Park and Turner Oran Precincts are notably lower than the yields envisaged in the earlier Growth Centre material. The Oran Park Precinct, for example, has been quoted in previous material as accommodating anywhere between 8,000 and 8,500 dwellings. However the current ILP indicates a yield in the order of 7500 dwellings, which potentially erodes the viability of public transport and the efficiencies of delivering new infrastructure to new release precincts.

It is noted that from an analysis of land uses within the precincts that this reduction in yield can be partly attributed to the considerable areas that are dedicated for generously wide creek corridors.

As the fundamental aim of the Growth Centres is to achieve a balance between development and the environment, we question whether an unreasonable weight is being attributed to the preservation of such generous creek corridors. Our concern is further reinforced by a review of the stringent environmental rehabilitation standards sought by the Draft DCPs in these corridors.

In our experience, notwithstanding the best intentions, urban creek corridors rarely evolve into pristine natural systems as they are subject to intrusion by domestic cats and dogs, vandalism, encroachment by adventurous children and general wear and tear invoked by their urban contexts. They are also very expensive to construct, manage and adequately maintain in the long term.

UDIA NSW considers that environmental agencies should focus on environmental assets outside urban areas, which may have better opportunities to be returned to high quality natural environments.

RECOMMENDATION

The land requirements for creek corridors in urban contexts be reviewed with the aim of striking an appropriate and fair balance between these competing land uses, particularly as we recognise that, in a densely developed urban environment characterised by the

densities being sought by the SEPP and DCP, the establishment of pristine natural corridors is somewhat idealistic, expensive to maintain and probably impractical.

High Quality Urban Design

While both DCPs are large and somewhat cumbersome, UDIA NSW recognises that they provide the mechanism to achieve considerable improvements in the design of urban neighbourhoods, when implemented in concert with the ILPs. They present a superior approach when compared to previous urban design controls and address many of the short comings identified with the Development Code.

RECOMMENDATION

The Growth Centres Commission, using the current draft DCPs as a template, establish a mechanism to review the DCPs at set periods following their implementation in the Camden LGA in order to identify opportunities for their refinement, which can be brought into the drafting of future DCPs in other precincts.

Development Application Documentation

UDIA NSW notes from the Draft DCPs that future development applications will be required to submit a large amount of documentation. Various provisions in the DCPs require the submission of reports including detailed tree surveys with every subdivision application, evidence that 90% of lots are within 400 metres safe walking distance of bus stops, Weed Management Plans, certification that top soil is free from weeds before use, air quality assessments, verification that noise levels within dwellings meet standards prior to the issuing of the occupancy certificates, Water Sensitive Development Plans and Solar access reports for each lot. Furthermore, 5 copies of all this documentation are required.

As the principal thrust of the Growth Centres SEPP and DCP is a co-ordinated, master planned approach to development, that has involved Camden Council as a partner in the process, we question whether all this documentation is necessary.

RECOMMENDATION

UDIA NSW recommends that the Growth Centres Commission liaise with Camden Council to implement an efficient system for documentation submission, possibly by the use of electronic /digital media to reduce the need for excessive document production and paper and energy consumption.

Conclusion

UDIA NSW believes that the documentation on exhibition has the potential to deliver outcomes of which the GCC and industry stakeholders can be justifiably proud. The comments provided should be interpreted as contributing to a robust debate in the interests of achieving these outcomes in the context of a balanced realisation of environmental, social and economic framework.

UDIA NSW welcomes the opportunity to elaborate on any of the recommendations provided in this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S Woodcock', with a long horizontal flourish extending to the right.

Scott N Woodcock
Executive Director