

28 June 2007

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



Dear Sir

RE: Oran Park and Turner Road Precincts – Supplementary Submission

Further to our earlier submission on the draft exhibition material, UDIA NSW would like to use the extended exhibition period to take the opportunity to add to the issues raised and to clarify some concerns raised previously. The opportunity for greater consultation with our membership has revealed a number of more specific matters in the exhibition material UDIA NSW believes require greater consideration.

Building Controls

UDIA NSW contends that given the timeframe for the delivery of new urban communities in both the Oran Park and Turner Road precincts, it is critical that the planning framework seek to provide an appropriate balance of flexibility and control. It is understood that there is a specific objective of delivering good urban design outcomes and this is strongly supported by UDIA NSW. While the objective of achieving this outcome is likely to remain, the practice of delivery is likely to evolve, and it is critical that the planning framework retain sufficient flexibility for the industry to meet changing consumer preferences, and progression in urban design practice.

The draft DCP prescribes a number of specific controls that are demonstrably aimed at achieving good urban design outcomes but may constrain the ability of builders to deliver a range of housing options to meet market demand. A number of the built form controls in the DCP may also constrain the ability of developers and builders to distinguish their product from that of competitors.

UDIA NSW contends that a prescriptive minimum floor to ceiling height of 2.7m is contrary to BCA requirements, economically inefficient, and unjustifiable. UDIA NSW members have indicated that an additional 300m to minimum floor heights prescribed in the BCA, as detailed in the draft DCPs, add approximately \$5,000 per storey to the cost of producing a single dwelling.

Given the high level of detail provided in the Primary Built Form Controls, UDIA NSW contends that in order for the industry to deliver the dwelling density targets, an FSR control is not the most appropriate mechanism for addressing the bulk and scale of

development. The setback controls prescribed in the draft DCPs essentially provide a defacto building envelope, and provide greater control over bulk and scale of development.

As detailed in the previous UDIA NSW submission, the DCPs are a suitable mechanism to achieve considerable improvements in the design of urban communities, and they present a superior approach when compared to previous urban design controls. However, the extent to which the development industry is denied a desirable degree of flexibility to deliver a range of affordable housing options to the market is cause for concern.

RECOMMENDATION

The Growth Centres Commission revise the draft DCP to provide greater flexibility for the development industry to achieve good urban design outcomes and meet density targets and remove minimum floor to ceiling heights by deferring to the current industry and BCA standard.

Centre Hierarchies and Employment Lands

The previous UDIA NSW submission on the draft exhibition material sought the promotion of Leppington as the primary regional centre regardless of delays or impediments to its development, at the expense of providing an expanded role for Oran Park and Turner Road in the interim. In the context of the economic and timing realities faced in the precinct, UDIA NSW considers that a more flexible approach will be necessary.

The delivery of Leppington as the primary regional centre is relatively constrained, with high fragmentation of ownership and high rural land values likely to exacerbate its development in the short to mid term. While UDIA NSW supports the long term function of Leppington, a degree of flexibility, particularly in the short term, will be desirable to provide greater amenity for new residents through an expanded role for Oran Park in the commercial hierarchy.

UDIA NSW supports the advice within the Employment Land Study (MacroPlan, 2007) that if Leppington is delayed, Oran Park will have a more important role to play as a more important regional role as a town centre to ensure local business activity is captured and not leaked to other, more established regions of Sydney.

The provision of amenity will be a major driver for settlement in the south west and meeting the retail and commercial needs of new communities is central to this task. UDIA NSW is concerned that the draft DCP for Turner Road does not provide an appropriate employment land use framework to support this objective.

There is some conflict in the exhibition material regarding the provision of bulky goods floorspace in the Turner Road precinct. The Employment Land Study cautions against this land use strategy, however 25,000 sqm. of bulky goods floorspace is provided for the precinct in the draft DCP.

UDIA NSW advocates that the development of bulky goods showrooms or home maker centres in the Turner Road precinct should not be precluded or constrained by an

arbitrary threshold, as is the case in the draft DCP. It is presumed that the provision of bulky goods floorspace has been limited to 25,000 sqm. to appease concerns in regard to potential impacts on the viability and timing of the development of the Oran Park centre.

UDIA NSW contends that the threshold prescribed in the draft DCP will seriously constrain the viability of bulky goods development in the precinct, which, due to its location, accessibility, and ability to provide appropriately sized land parcels, is highly suitable for this use. The provision of a viable bulky goods centre is dependent on, but not limited to;

- Access to land that is more affordable relative to typical commercial development;
- The ability to develop large floor plates to achieve necessary economies of scale;
- Access to sufficient land for businesses to cluster to develop agglomeration economies – essential to making the centre viable.

UDIA NSW contends that an increase in the prescribed floorspace will not have a deleterious impact on the development of Oran Park Town Centre, nor its long term viability. Bulky goods uses do not compete directly with traditional commercial and retail centres but provide the capacity for high levels of employment generation and the nature of the use is such that adaptability for future, alternative uses is inherent.

RECOMMENDATION

The Growth Centres Commission take the opportunity to undertake a 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.

Conclusion

UDIA NSW has taken the opportunity to add to its previous submission and reiterates its support for the precinct planning process. The opportunity for further consultation with our membership has identified a number of issues and recommendations UDIA NSW believes warrant further consideration from the GCC. UDIA NSW welcomes the opportunity to elaborate on any of the recommendations provided in this supplementary submission.

Yours sincerely



Scott N Woodcock
Executive Director