

5 EFFECTIVE PLANNING AND DESIGN

5.1 Getting the Balance Right

The exhibition material describes the approach for the planning of the Growth Centres. Planning seeks to achieve growth in a sustainable manner that balances environmental, liveability and competitiveness goals. Innovative planning for the release areas will provide:

- better public transport (achieved through higher densities of development);
- a range of land uses to provide the right mix of houses, jobs, open and recreational space and green spaces;
- easy access to major town centres with a full range of shops, recreational facilities and services, along with smaller villages centres and neighbourhood shops;
- jobs available locally within the region, reducing the demand for transport services into the CBD and cutting travel times;
- street and suburban structure planned around bus based 400 metre radius walkable neighbourhoods so that residents can walk to shops for their daily needs and can access efficient public transport for trips further afield;
- a wide range of housing choice to provide for different needs and incomes; and
- conservation land in and around development sites to help protect the regions biodiversity and provide clean air for Western Sydney⁴.

UDIA NSW recognises that these objectives represent best practice urban design and supports their achievement. Such approaches are variously described as 'Transit Oriented Development' (TOD), Smart Growth or New Urbanism. Regardless of the terminology UDIA NSW supports and commends the NSW Government on its approach in planning holistic and distinctive communities in contrast to providing for additional dormitory suburbs with limited access to transport, employment and services.

Nevertheless, UDIA NSW has identified a number of constraints associated with the achievement of these objectives in the North West and South West Growth Centres. These constraints are described in sections 5.2 – 5.7.

⁴ Managing Sydney's Growth Centre, page 3

5.2 Densities

The Structure plans identify two forms of residential land use, 'Housing' and 'Mixed Use'. Neither term is defined in detail in the exhibition documentation. Housing is defined by a 'white' tone on the Structure Plan, whilst mixed use centres are defined by a maroon tone at the centre with an orange tone surrounding it and in frame areas.

UDIA NSW recognises that there are a number of matters that it believes need to be addressed with the proposed distribution and function of these land uses within the NW and SW Structure Plans. They are:

1. Viable Densities.

- i. There is a lack of detail on the expectations for residential densities within the mixed use centres and housing areas. We note that Government now seeks a gross residential density of 15 dw/ha in new release areas in the Sydney Metropolitan area. However this requirement is not described in detail in the planning documents. Development forms such as 'shop top' housing and mid-rise (up to 5 stories) residential flat buildings are implied by the sketches in the exhibition documentation.
- ii. This density will be difficult to achieve in a widespread manner across the areas of the structure plan areas due to access, isolation, topography and other matters. To achieve this density requires viable local and district centres with mixed use buildings, flat land to accommodate small lot housing and many areas with high amenity to attract multi-unit housing investors and residents from high quality competing developments in areas such as Breakfast Point and Victoria Park.
- iii. Density will, to a significant degree, be driven by residential typologies acceptable to the market. New housing forms such as shop top housing and mid-rise residential flat buildings are unproven in outer suburbs, unlikely to gain immediate market acceptance in new release areas, and need to be supported by significant financial investment in public transport and public domain works to influence the market and be embraced by purchasers.
- iv. The application of the infrastructure levy of \$25,000 for apartments, in addition to conventional s94 Contributions, coupled with the increased cost per square metre of higher rise development makes such a product largely uncompetitive on the urban fringe. Mid to high rise apartment buildings incur Workcover/union costs and have added construction costs associated with carparking, ventilation and elevators.

The demand for apartments is also compromised by competing product available in existing urban areas which are close to transport, services and employment. Furthermore, these apartments competing in existing urban areas are not burdened by the added cost of the infrastructure the levy.

- v. UDIA NSW questions government's expectations regarding the achievement of a uniform residential density across the NW and SW Sectors and the achievement of higher density in the dwelling typologies envisaged in the plan. The quantum of residential density and the location of different building typologies should be applied at precinct level detail that address local site conditions and development visions, and may not necessarily achieve a uniform 15 dw/ha throughout the Growth Centres.

- vi. Finally, a staged approach should be adopted that facilitates lower densities at first before the threshold population reaches a stage that can support higher densities and services.

2. Inappropriate Locations.

The Draft Structure Plans often locate higher densities in areas of reduced amenity. UDIA NSW questions the proposal to locate the bulk of higher density residential areas along established and proposed major and arterial roads. Many of the existing roads already experience significant traffic volumes which will only increase as the sectors undergo a transition from predominantly rural to urban activity.

In turn, this will generate local environmental impacts by way of poor air quality, noise, vibration and poor access. Urban corridors with high traffic volumes are not considered appropriate for high density habitation as is illustrated by Parramatta Road and the Government's desire to improve amenity in these areas.

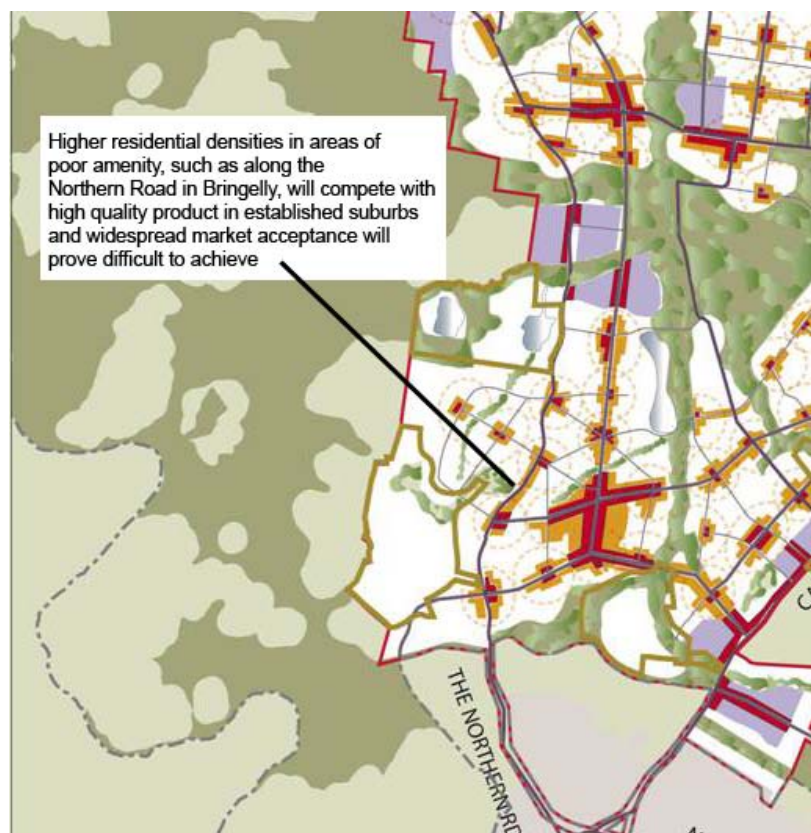


Figure 4: Example of poorly located higher density development

While UDIA NSW acknowledges that the major transport corridors will offer enhanced access to public transport, the most appropriate approach to promote higher density residential use is to seek its implementation in locations which offer high residential amenity within release precincts, such as surrounding retail centres and local open space assets (instead of on their boundaries along major roads) and support these locations with a coordinated identification of bus routes which serve locally and can transport regionally.

RECOMMENDATIONS

UDIA NSW recommends the following:

- 1. Expectations for residential densities in new release areas should be clarified;*
- 2. Alternative approaches to density should be explored, rather than the adoption of a uniform 15 dw/ha across the Growth Centre area, including a site by site approach, based on ground truthing of local conditions and staging/evolution (ie when critical mass of public transport, amenity and services is achieved) of the Growth Centre;*
- 3. Expectations for high density, high rise residential built forms should be tempered unless Government is prepared to influence market demand by providing public investment in public domain works, public transport and services to establish competitive conditions to permit this dwelling type to compete with other similar developments in established suburbs with marked locational advantages; and*
- 4. Higher densities should be implemented in locations which offer high residential amenity such as surrounding centres and local open space assets (instead of on boundaries along major roads) and support these locations with a coordinated investment in public infrastructure.*

5.3 Employment lands

The Structure Plans for the NW and SW Sectors identify locations for employment lands. The plan legend indicates that areas coloured purple are designated for future industrial uses. These uses are predominantly located on the western periphery of the SW Sector and the western, northern and eastern edges of the NW Sector.

With the exception of the proposed Marsden Industrial area, all proposed employment areas are distant from the arterial motorway network and in the South West Growth Centre. In particular, the SW Sector employment areas are isolated and distant from the areas in which infrastructure support is greatest.

UDIA NSW considers that these locational and access characteristics may hinder the achievement of the Growth Centre objectives, particularly for those people seeking access to jobs locally. Furthermore, the location of industrial areas on the edge of urban areas distant from the arterial road network will generate significant local impacts by way of increased truck movements through residential areas.

Figure 5 illustrates the structure plan's siting of industrial areas remote from the arterial road network.

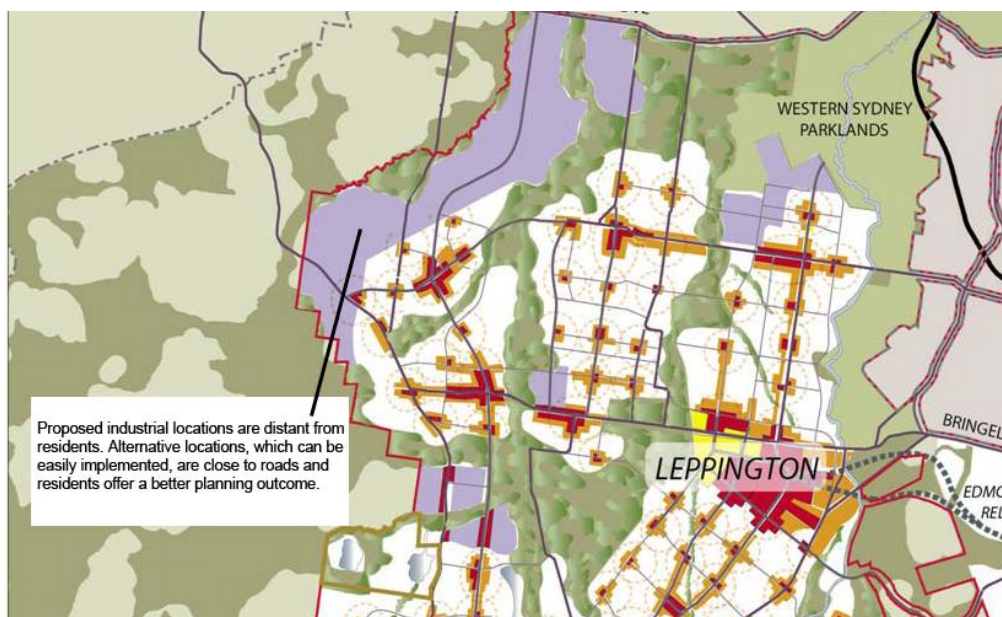


Figure 5: Opportunities are required for better located employment lands

- UDIA NSW notes that there is a significant opportunity to achieve employment use in locations close to the arterial road network, housing and centres and/or in smaller ownerships.
- Areas of large land holdings currently identified for industrial use can be freed for residential use providing opportunities to expedite coordinated residential land release, which demonstrates the application of contemporary urban design principles (which will be difficult to achieve in areas of fragmented ownership currently designated for future housing).

RECOMMENDATIONS

UDIA NSW recommends that the proposed location of employment lands be reviewed with the objective of designating such activities in areas which can facilitate their release and which can be conveniently accessed.

5.4 Retail and Commercial Centres and Land Use

The Structure Plans for the NW and SW Sectors identify locations for retail/commercial areas coloured red. Such areas are located along major roads and in local centres based on walkable (400metre radius) catchments.

The structure plan makes assumptions regarding the location of retail. One of the government's primary objectives is to create *streets and suburbs planned so that residents can walk to shops for their daily needs - residents won't have to use a litre of petrol to buy a litre of milk.*

UDIA NSW contends that the viability of many of the proposed retail areas may be difficult to sustain, with the geographic extent of retail being overstated. Specifically:

- a focus of mixed use activity along existing and proposed major/arterial roads potentially generates highway strip commercial development, which UDIA NSW believes would represent a poor urban design outcome and contrary to the Plans' objectives;
- a lack of clarity on the scale of commercial, retail and other non residential uses within the mixed use centres precludes the identification of a viable retail and commercial hierarchy within each structure plan area. This will generate uncertainty within the industry regarding the potential for development as indicated by the Plans, potentially either stalling their development or resulting in uncoordinated retail/commercial development across the Structure Plan areas by developers seeking to 'get in first';



Figure 6: Examples of Potential Strip Development, NW Growth Corridor

- dependence on a 400 metre walkable catchment centre on local convenience shops may be difficult to achieve and sustain. The industry's experience is that a local store will have limited viability based on such a small catchment in a predominantly car oriented area overlain by the presence of a retail hierarchy based on the competitive Coles and Woolworths Supermarkets duopoly supported by aligned service stations. Notwithstanding the proposed higher densities surrounding the centres, UDIA members' experience indicates that local shops may have some prospect for viability where they are based on an 800 metre radius in a prominent and accessible location.

- in many areas the critical mass of the catchment is compromised and eroded by the inclusion of other uses, such as areas of Landscape and Rural Lifestyle Zone (refer to Figure 7).
- overall, the proposed structure plans may place unrealistic expectations, or demands, upon developers in terms of the extent of commercial activity that they may achieve on their land.

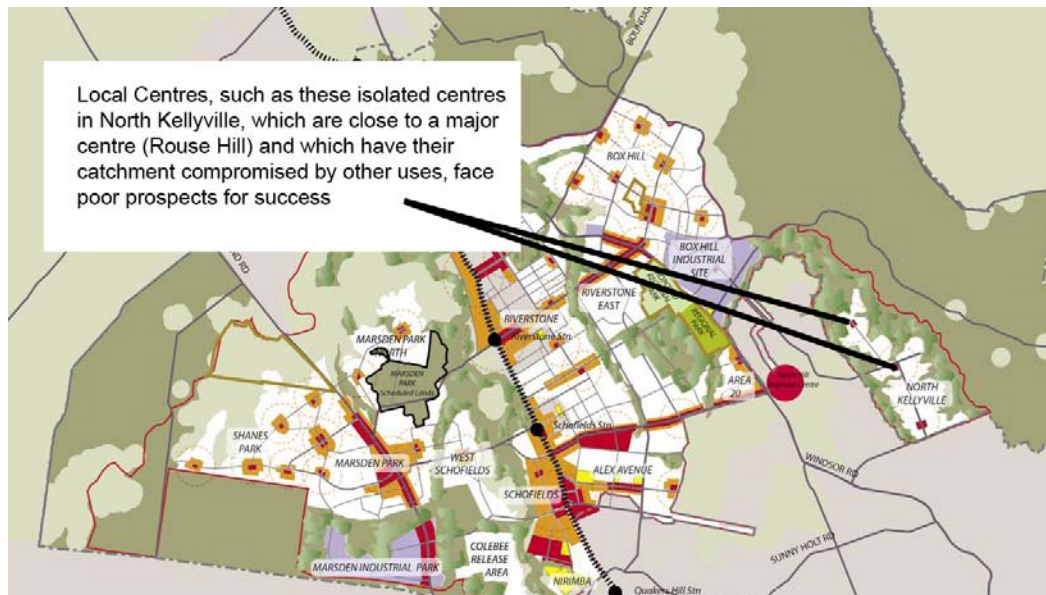


Figure 7: Examples of potential centres which will have limited viability

RECOMMENDATION

UDIA NSW recommends that the proposed distribution of retail and commercial activities be reviewed in the following manner:

- *strip commercial development be amended to focus commercial uses in specific locations to assist the generation of economic opportunities through agglomerations of alike activity, establish a distinctive retail hierarchy, and avoid the urban design impacts of strip development on major roads;*
- *the structure of local neighbourhood retailing be based on 800 metre catchments in association with bus routes and a connected road network. Potential locations should achieve all three criteria; and*
- *the land use in neighbourhood centre catchments should be maximised for urban residential uses to facilitate the viability of retail and commercial activities.*

5.5 Water Supply Canals

The exhibition documentation identifies a number of areas proposed to be 'Water Supply Canals'. These areas all appear to be confined to, and located in, the SW Sector (as illustrated in Figure 8) and on the whole comprise farm dams and other hydrological features, such as creeks and Riparian Zones that will be required to be either removed or essentially rebuilt with the onset of urban development.

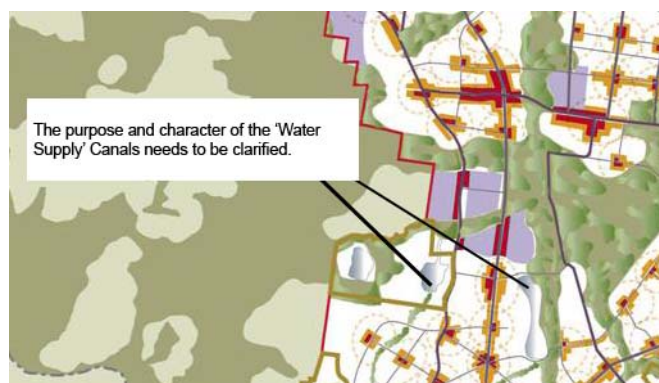


Figure 8: Location of water supply canals in SW Growth Centre

The exhibition documentation fails to explain the function, purpose, objectives or character of a 'Water Supply Canal'. Furthermore no guidance is provided regarding future land use and opportunities for activities to be undertaken within the part of the site so designated.

This lack of clarity does not permit a complete understanding of the new zone. It also compromises the ability of landowners to not only provide informed comment on the proposed zone as it affects their interests, but also, due to the uncertainty it creates, unfairly jeopardises planning for the long term use of their land.

RECOMMENDATIONS

UDIA NSW recommends that the objectives, function and intended form of the 'Water Supply' Canals be clarified or removed from the Structure Plan.

5.6 Heritage Curtilages

A number of 'heritage curtilages under investigation' are identified, predominantly located within the SW Sector. It is implied, but not explicitly stated that the designations reflect the assessment of the heritage significance of the property undertaken by the NSW Heritage Council. The exhibition documentation notes that the development of any land within the heritage curtilage will require the additional consent of the NSW Heritage Council.

The areas identified as 'heritage curtilages under investigation' are large and have an area well in excess of the heritage item and its immediate area. In many instances a boundary is based on arbitrary cadastral / land ownership boundaries and cannot therefore, in our opinion, be an accurate reflection of the curtilage.

In our view the designation of the curtilages is excessive and unreasonable. There is a significant body of investigation that permits an accurate definition of the boundaries at this stage of the structure planning process. This current situation generates uncertainty, undermining the ability of landowners to not only provide informed comment on the proposed plan but also unfairly jeopardises their planning for the long term use of their land.

Furthermore the need to obtain the concurrence of the NSW Heritage Council introduces an additional and time consuming step in the approval process, the avoidance of which is expressly sought by the proposed Growth Centres' planning process and is contrary to the Plans objective to establish an efficient development consent process.

RECOMMENDATIONS

UDIA NSW recommends the following:

- 1. The curtilages of heritage properties within each Growth Centre be identified and confirmed in the structure planning process. The curtilages should be based on a pragmatic approach which achieves a careful balance between conservation goals and goals that achieve sufficient critical mass of residential activity to support public transport and local neighbourhood centres.*
- 2. The requirement for the concurrent approval of the NSW Heritage Council be removed, once curtilage boundaries have been confirmed, to expedite the consent process.*

5.7 Transition Zones

Bounding the majority of the proposed urban areas, and in areas encroaching into them, are areas proposed to be 'zoned' for a new 'Landscape and Rural Lifestyle' activity. It is acknowledged that the Minister for Planning has signalled his intention to remove the planning control. However, the intention to secure areas of biodiversity to complement the intensive urban development is likely to remain. Accordingly, UDIA NSW offers its comments within the context of the exhibited documents.

The proposed green overlay contained in the exhibited plans is not strictly a 'zone' but nonetheless introduces restrictions on possible use of the land (though this needs to be clarified, refer to Part 6.4 below) in order to achieve environmental protection and environmental enhancement goals. However, for the purposes of this report we shall refer to area delineated by the green overlay as a zone.

The exhibition documentation identifies four criteria on which land has been assessed to have sufficient regional value and strategic significance to be included in the zone. These comprise:

- regionally significant areas for biodiversity protection and enhancement;
- riparian or waterway buffers considered important for maintaining and improving aquatic habitat;
- areas of high archaeological sensitivity of aboriginal heritage; and
- land of high scenic value and amenity⁵.

There are a number of matters that need to be addressed with the proposed distribution and function of this 'zone' within the NW and SW Structure Plans. They are:

1. **Ground Truthing.** Many lands do not exhibit, either fully or partly, the characteristics required to satisfy the criteria of the Landscape and Rural Lifestyle zone noted above. In our view, the designation of the boundaries of the Landscape and Rural Lifestyle zone lacks thorough and detailed investigation and the draft boundary should be reviewed by detailed site analysis and 'ground truthing', with an emphasis on recognising land with urban development capability as well as environmental value.
2. **Bushfire Hazard.** The documentation on exhibition is generally silent on the need to address potential bushfire impact in the proposed zone. In accordance with the guidelines contained within the document 'Planning for Bushfire Protection - 2001' significant areas of Asset Protection Zone (APZ) will be required along the boundary edges where the Zone and urban areas join, particularly if revegetation of the zone is pursued as proposed. This will generate one, or both of the following impacts:
 - It will reduce the area of potential urban development, reducing the scale of the potential resident population eroding, in turn, the achievement of the objectives for a viable public transport and walkable retail neighbourhood centres.
 - It will compromise and reduce the size and environmental values of the areas intended for Landscape and Rural Lifestyle uses. This is particularly important where such areas constitute narrow corridors of vegetation. Removal of vegetation to establish APZs will render many corridors worthless in terms of

⁵ Managing Sydney's Growth Centres, page 18

environmental value, questioning their value. UDIA NSW is highly critical of 'Planning for Bushfire Protection - 2001' and the enabling legislation. The Institute is therefore working with the Department of Planning and the Rural Fire Service to develop an improved system of governance with respect to bushfire protection policy.

4. **Land Use Conflicts.** The exhibition documentation notes that the underlying existing zoning of land affected by the Landscape and Rural Lifestyle zone will be retained. In many areas the current zoning of the land is Rural or similar. The zones provide for a wide range of associated urban land uses such as schools, pony clubs, recreation facilities and the like. They also provide for a wide range of agricultural uses including poultry sheds, intensive agriculture and dairy farming. Retention of intensive rural activities adjoining urban lands, particularly residential uses, has the potential to generate significant land use conflicts. Poultry sheds, in particular, with the need to maintain appropriate buffers for health purposes, will generate significant interface issues at the rural / urban boundary (not withstanding their poor ability to achieve the objectives of the Landscape and Rural Lifestyle Zone).
5. **Urban Land Use Support.** The associated urban land permitted in the rural zone described above has a legitimate role in supporting urban areas. Should the Landscape and Rural Lifestyle Zone restrict their expansion or force new activities further away from the city, not only are they depriving residents of convenient access to such services or facilities, but also contributing to increased car use and dispersion (rather than concentration/agglomeration) of supporting uses. Both of these outcomes are, in UDIA NSW's view, contrary to the objectives of the Growth Centres.
6. **Flood Lands.** Potentially flood-affected areas may still be able to be used for alternate uses, including urban support, agriculture, and conservation. The detailed planning occurring within the Growth Centres areas should consider such uses. In addition, the UDIA asserts that major infrastructure to be potentially created in flood lands should be designed for local flooding rather than regional flooding conditions in order to save costs.
7. **Effective Management of Boundary Lands.** Generally Local Environmental Plans (LEPs) apply a minimum lot size (of 40ha in the case of 'Rural' Zoned land) precluding the subdivision of the lots. However through detailed site specific investigation and identification of appropriate land uses and subdivision, the affected land holdings may generate opportunities to realise some development whilst also:
 - providing the opportunity to secure environmental corridors and features in public ownership; and/or
 - achieving rehabilitation of environmental areas with limited or in many cases no recourse to public funding; and/or
 - secure private management and protection of environmental areas, bushfire hazard 'Asset Protection Zones' (APZs) and other matters in private land, again with limited or in many cases no recourse to public funding.

UDIA NSW recognises that to address all the issues presented including bushfire protection, land use conflicts, urban land use support and boundary management requires innovative and site specific land use planning solutions where development married with appropriate land use management can not only secure housing in close proximity to centres and public transport (and thus achieve the lifestyle, competitiveness and sustainability objectives of the Growth Centre), but also achieve the protection and rehabilitation of environmental areas at minimal or no cost to Government without the incumbent requirement to impose crude restrictions on land use and invoke costly public acquisition of private land.

The most effective and proven mechanism to achieve these aims is to introduce a new land use between the 'white' (urban/housing) and the 'green' (Landscape and Rural Lifestyle Areas) in the Structure Plan along the urban and landscape/rural lifestyle interface.

This land use would form the 'transition zone'; between the urban and non-urban land uses and would provide for appropriate subdivision, land management and access to ensure that a balanced approach is achieved. The concept of the transition zone is illustrated in Figure 9.

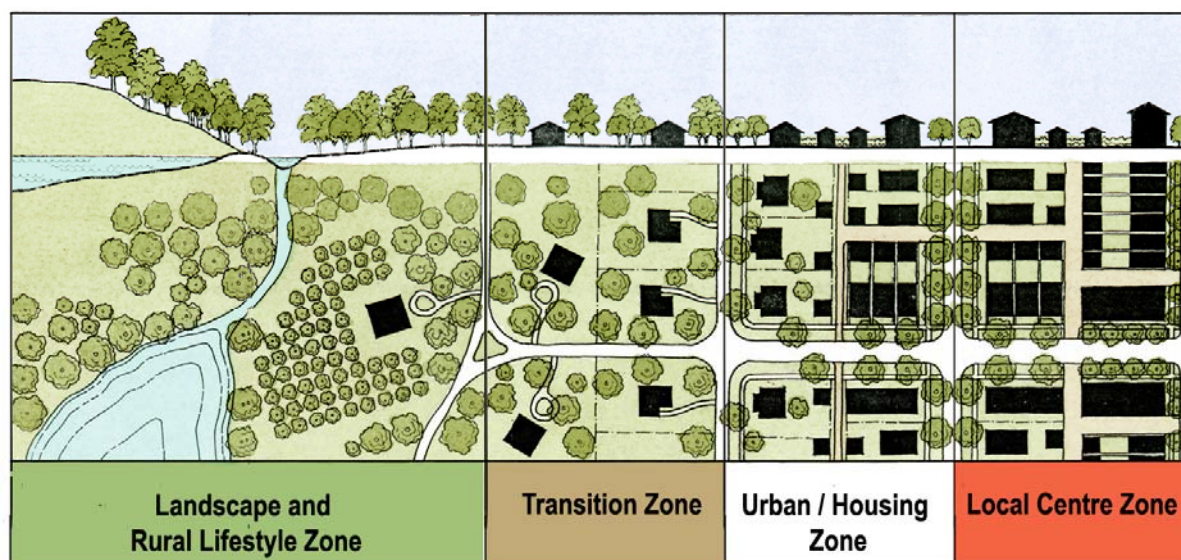


Figure 9: Illustration of Function & Character of a New 'Transition' Zone

The creation of the transition zone also has implications for the development of fragmented land which is discussed in section 6.2 and 6.3.

RECOMMENDATION

UDIA NSW recommends the following:

1. *A new zone, or sub-zone within the 'Landscape and Rural Lifestyle' zone, should be introduced, notionally entitled the 'Transition Zone' which provides for the realisation of some urban development on larger lots, say around 2,000 – 4,000sqm, which can provide the mechanism to fund and/or achieve the private management of environmental areas and bushfire Asset Protection Zones and the establishment of environmental corridors in public ownership at no cost to Government.*