

9/11/2018



Ms Carolyn McNally
Secretary
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Secretary,

Re: Draft Lowes Creek Marylands Precinct Plan

The Urban Development Institute of Australia NSW (UDIA) is the leading industry organisation for the property development sector of NSW. We represent over 500 organisations and our members include developers, regulators, and leading professional advisors. Local councils, particularly growth area councils, are also active members of the Institute. The Institute's advocacy is focused on creating more liveable, affordable and connected cities.

The Lowes Creek Marylands Precinct Plan is welcomed in principle. UDIA supports the vision of developing Western Sydney as a vibrant jobs hub with residential development supported by rail and road infrastructure. Infrastructure is critical to unlocking the Western Sydney Airport, aerotropolis, and therefore a significant consideration in planning for Lowes Creek. As the Airport and aerotropolis develop the surrounding areas will need to be part of this conversation and respond in kind. UDIA has long advocated for the need to provide clear, coordinated land use planning in Sydney's Growth Centres as well as a timely release of land to ensure supply matches demand. We see this as an iterative process and would caution fine-grained zoning at this stage.

Given the sheer scale of future development and planning needed the UDIA would strongly recommend the re-introduction of the Urban Development Program (UDP). This precinct planning could be coordinated and reported through a consolidated Urban Development Program (UDP) for the Sydney Metropolitan Area. The UDIA has been working with Blacktown Council on an Urban Development Project Pilot, which seeks to replicate the UDP model for the Blacktown LGA. We would welcome a meeting to further develop how this is working in Blacktown and how it could be replicated across Western Sydney and Metropolitan Sydney.

In the 10 to 12 years that followed the introduction of Sydney's Growth Centres in 2006, issues of housing affordability, housing choice / typology and population growth have emerged. Furthermore, new, and unexpected catalytic projects have been announced, for example the Western Sydney Airport and North – South Rail, that were unforeseen in the planning of the Growth Centres 10 years ago. These projects will have a profound influence on Precinct Planning in South West Sydney.

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These factors, coupled with evolving approaches to stormwater treatment, open space provision, small lot housing (i.e. higher density) and provision of employment lands require planning to be flexible and responsive, particularly where land is not subject to fragmented ownership and projects are large and have a long (5 year plus) duration.

It is important that Precinct Plans in these Centres address these issues through appropriate residential densities, local infrastructure and open space. However, these Precinct Plans cannot predict, and should not provide an overtly detailed plan for, circumstances 10 to 15 years in the future. Thus they should be presented in a format that accepts that growth is a dynamic process where settlements and human activities evolve and change in response to complex and interacting economic, social, technological and political forces.

However, from our review of the material currently on exhibition we have a concern that the approach adopted for the Lowes Creek Maryland's Precinct Plan may set a precedent for planning in South West Sydney that may well result in negative repercussions for housing supply, affordability and diversity.

This submission addresses those concerns and includes recommendations to address this. Our recommendations are not merely intended to address the Lowes Creek Maryland Precinct alone but apply to the Government's approach to all precinct planning where timeframes for development are long term and land ownership does not suffer from excessive fragmentation.

1. Urban Development Zone

We note that the zoning approach for the Lowes Creek Maryland Precinct adopts a fine grained highly detailed pattern of land use zones. This is inherently inflexible and represents a regressive step, where flexible options are available, in planning in NSW.

UDIA, however, supports the use of the Department's recently introduced 'Urban Development Zone' in the Growth Centres. The zone provides greater flexibility in the planning of estates and neighbourhoods, without the need for planning proposals for minor zoning adjustments. The Department has recently applied this zone to the draft Wilton Precinct Plan and UDIA encourages the Department to apply this approach in Lowes Creek Maryland.

It is vital that the Site Verification Certificate process that underpins an Urban Development Zone operates transparently and efficiently to give certainty to all parties that planning objectives are achieved.

2. Maximum dwelling density caps

UDIA has consistently advocated that maximum dwelling densities in the Growth Centres will lead to a lack of housing diversity and deliver fewer dwellings than intended due to the way dwelling density is calculated.

Minimum density controls in the Growth Centres have typically delivered a density of housing product of around 16-22 dwellings per hectare on R2 zoned land and around 32-40 dwellings per hectare in R3 zoned land.

By comparison, the proposed Lowes Creek Marylands Precinct Plan would result in a density range of 15-25 dwellings per hectare on R2 and 25-35 dwellings per hectare on R3 land. These density caps would have a significant impact on active development projects as well as the feasibility of more diverse housing types in R2 and R3 zoned land. They would remove the ability and incentives for developers to deliver housing diversity and negatively impact on housing affordability.

3. Indicative Layout Plan issues

The Indicative Layout Plan (ILP) for Lowes Creek Marylands needs to learn from previous ILPs that are continuing to complicate development across the Growth Centres.

Guidance should be given in the ILP and DCP as to which local roads are shown in their final alignment and which can be changed to suit individual developers' building typologies and staging. This has been used well in some DCPs such as Box Hill as it provides certainty on layouts for all of the individual land owners.

In previous ILPs, lot depth has been overlooked in some cases resulting in lots over 40m deep. This is inefficient and does not reflect the housing product that is in demand. The ILP should be reviewed to ensure that lot depths are as close to 30m as practical.

We would be pleased to meet with you to discuss this matter further. If you have any queries, please contact Elliott Hale, General Manager, Policy, Media and Government Relations at ehale@udiansw.com.au or 0478 959 917 to arrange a meeting.

Yours sincerely



Steve Mann
Chief Executive

The Urban Development Institute of Australia (UDIA) NSW is the leading property industry group promoting the responsible growth of this State. We have over 500 company members and more than 3,000 of their employees attend our events, sit on our committees, undertake training or are involved in the activities of the organisation on an annual basis. Our organisation is the oldest property development advocacy group in the country, having been established in 1962. Our advocacy is based on making our cities more liveable, affordable and connected.