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Secretary

Department of Planning and Environment

GPO Box 39

Sydney NSW 2001

Re: Submission on the Draft North West Priority Growth Area – Land Use and Infrastructure Implementation Plan

We refer to the abovementioned Draft North West Priority Growth Area – Land Use and Infrastructure Implementation Plan. The following is submitted for consideration in assessing the appropriateness of proposed amendments to the North West Structure Growth Structure Plan.

Understanding of the Draft Implementation Plan

We understand that the Draft Implementation Plan proposes statutory reforms to planning controls to align planning in the Priority Growth Area with the standard local environmental plans and to consolidate existing precinct plans. By consolidating the existing Precincts Plans in the North West Priority Growth Area, it is hoped that it will reduce duplication and inconsistencies, improve the delivery of new development and will give councils greater control over local issues. In this regard, it is intended that development controls will be more consistent with the Standard Instrument Local Environmental Plan which means that Precinct Plans can be more readily removed from the Growth Centres SEPP and include them in Council's local planning controls.

It is also noted that the Draft Implementation Plan acknowledges the significant demand for a variety of housing types within the North West Priority Growth areas. As a result, the Draft Implementation Plan proposes to increase residential densities and aligning the roll out of corresponding trunk infrastructure to accommodate greater population expectations in the Priority Growth Area.

We are encouraged by the proposed Draft Implementation Plan to consolidate the existing Precinct Plans into one document which will no doubt provide more certainty in the development planning process. We also welcome the increased densities and opportunity for greater housing choice for the North West Priority Growth Area.

However, we are concerned that there is no corresponding increase in density for retail/business zones with the Priority Growth area.

Increased Densities

It is acknowledged that population growth in the North West Priority Growth Area has been greater than what was originally anticipated when the North West Structure Plan was first implemented in 2006. In fact, it is noted in the Housing Analysis (section 5) of the Draft Implementation Plan that, ...the theoretical capacity of the Priority Growth Area for new homes has increased from 70,000 to 90,000 (a population of approximately 250,000 people), and it is anticipated that around 33,000 dwellings will be delivered within the next ten years.

Further, there has been a strong imperative from Government with a corresponding market demand to provide greater residential choice, including the offering of Affordable Housing opportunities that were not envisaged some 10 years ago when the North West Structure Plan was implemented in 2006. In this regard, it is acknowledged in the Implementation Plan, that small residential lots (250m² - 350m²) are the most popular in the market. Indeed, many developers are incorporating higher proportions of small lot housing into the overall residential mix, which attempt to meet the significant housing affordability concerns.

It is proposed to consolidate the existing Precinct Plans that are within the North West Priority Growth Area. To assist in achieving the extra 30,000 people in this Growth Area, the residential development controls will see greater densities through the use of appropriate land use zones and smaller minimum lot sizes. It is also proposed to coordinate trunk infrastructure to support this expected increased population.

As an example of increased densities, the Box Hill Area will see the following minimum lot sizes for semi-detached residential development as follows:

- > R2 Low Density Residential zone – 200m²
- > R3 Medium Density Residential – 150m²
- > R4 High Density Residential – 125m²

(Explanation of Amendments to SEPP (Sydney Region Growth Centres) 2006 - North West Priority Growth Centres Area, p.12, 2017)

Basis of this Submission

The proposed density increases and up-zoning of certain residential areas combined with improved infrastructure for the North West Priority Growth Centre, is very much supported and encouraged. However, whilst there are proposed density increases for residential development to cope with the significantly higher population growth expectation for the North West Growth Centre, there has not been any corresponding consideration for increasing the density of retail/business zoned land. It is also noted that the 2016 census results show an increase in the average number of people per household in Greater Sydney, with areas within the North West having a more substantial increase than areas within central Sydney – further contributing to population growth within retail/business zone catchment areas.

The existing floor space ratios and building height limits for the B1 Neighbourhood Centre and B2 Local Centre land use zones will not be changing in the proposed Implementation Plan. The concern is that with the expected significant increase in population of the Growth Centre area and no corresponding increases in densities for retail/business zones, there will be a substantial underdevelopment and under provision of existing and proposed new retail sites that will not be able meet the increased demand of the projected population for the area. The retail/business zones will also be providing much needed jobs for the growing local population and its capacity to provide both services and jobs is a key component of the NSW Government's 30-minute city initiative to reduce the amount of time people need to travel and increase the number of opportunities for everyone.

Concluding Comments and Recommendation

Please note that generally, the Draft Implementation Plan offers many positive outcomes for the future development of the North West Priority Growth Area, particularly in providing greater residential choice and expedited trunk infrastructure. However, in its present form, the lack of consideration of corresponding density (height and FSR) increases for retail/business zoned land has been noticeably neglected.

It is clear there has been minimal consideration to provide flexibility in the development controls, such as allowing increased floor space ratios and height limits to align with the substantial residential density increases.

We believe that the Draft Implementation Plan presents a great opportunity to improve the density controls for retail/business development, particularly for those areas located in Marsden Park, Schofields and Box Hill, which are areas experiencing substantial population increases.

Therefore, in relation to existing and proposed retail/business zoned land, it is requested that the following amendments to the Draft Implementation Plan be adopted:

1. Increase the Floor Space Ratios for all Business Zoned land
2. Provide for greater height limits for all Business Zoned Land
3. Zone more land for retail/commercial land uses

We trust the above submission assists you in formulating a considered Implementation Plan for the North West Priority Growth Area.

Should you have any queries on the above, please do not hesitate to contact me on 0431 063 866

Yours sincerely,



Hamish Boots
State Capital Transaction Manager NSW/ACT
On behalf of Coles Group Property Developments Limited