

28 September 2018

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

Dear Secretary,

**Re: Draft West Schofields Precinct Plan**

The Urban Development Institute of Australia (UDIA) NSW 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 West Schofields Precinct Plan is welcomed in principle. UDIA NSW has long advocated for the need to provide clear, coordinated land use planning in Sydney's Growth Centres. UDIA NSW recommends this planning be coordinated and reported through a consolidated Urban Development Program (UDP) for the Sydney Metropolitan Area.

Since the introduction of Sydney's Growth Centres in 2006, issues of housing affordability, population growth and new rail lines have emerged. It is important that Precinct Plans in these Centres address these issues through appropriate residential densities, local infrastructure and open space.

However, the West Schofields Precinct Plan may well result in negative repercussions for housing supply, affordability and diversity. This submission addresses those concerns and includes recommendations to address this.

**1. Maximum dwelling density caps**

UDIA NSW has consistently argued against the imposition of maximum dwelling densities in the Growth Centres. This is because they have the potential to stymie housing diversity and deliver fewer dwellings than intended due to the way dwelling density is calculated.

Minimum density controls in the Sydney Growth Centres have typically delivered a density of housing product of around 18-23 dwellings per hectare on R2 zoned land and around 32-40 dwellings per hectare in R3 zoned land.

By comparison, the proposed West Schofields 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.

Density is calculated based on the net developable area (NDA) of a site within a specific development application, not estate. NDA includes the residential lot area, plus half the width of adjoining roads. Examples of this calculation are provided below for conventional lots and the density they deliver:

### **450m<sup>2</sup> Lots**

*At the establishment of the Growth Centres, 450m<sup>2</sup> lots were considered to be the standard lot size. Based on a local road width of 16m, a 15m wide, 450m<sup>2</sup> lot, has a NDA 570m<sup>2</sup>. If a whole site was developed based on this simple lot metric, it would deliver a density of 17 dwellings per hectare as a conventional subdivision.*

### **300m<sup>2</sup> Lots**

*300m<sup>2</sup> lots are now considered to be the standard lot size. Based on the same road width a 10m wide, 300m<sup>2</sup> lot has a NDA of 380m<sup>2</sup> and equates to a density of 26 dwellings per hectare.*

The application of a maximum density on R2 zoned land of 25 dwellings per hectare would seem appropriate for conventional subdivision. However, densities are not based over an entire precinct (this would be too complex to administer for Councils) or even estates. Establishing maximum densities delivers unintended consequences for R2 zoned land because many housing types desired in this zone cannot be delivered, as illustrated in the table below:

### **Net Developable Area (NDA) of different housing types**

<b>Dwelling Type</b>	<b>Minimum Lot Size</b>	<b>Lot Details</b>	<b>Half Width Road Area</b>	<b>Total NDA</b>	<b>Equivalent Density</b>
Attached Dwellings (Front loaded 7 pack)	1,500m <sup>2</sup>	1,505m <sup>2</sup> 60m x 25.5m (5m splay)	913m <sup>2</sup>	2,418m <sup>2</sup>	29.0dw/ha
Attached Dwellings (Rear loaded 9 pack)	1,500m <sup>2</sup>	1,725m <sup>2</sup> 60m x 30m (5m splay)	985m <sup>2</sup>	2,710m <sup>2</sup>	33.2dw/ha
Dual Occupancy – Corner Lot	500m <sup>2</sup>	501m <sup>2</sup> 16m x 30m (5m splay)	380.5m <sup>2</sup>	881.5m <sup>2</sup>	22.7dw/ha
Dual Occupancy	500m <sup>2</sup>	510m <sup>2</sup> 17m x 30m	136m <sup>2</sup>	646m <sup>2</sup>	30.9dw/ha
Manor Home – Corner Lot	600m <sup>2</sup>	600m <sup>2</sup> 20.5m x 30m (5m splay)	416.5m <sup>2</sup>	1016.5m <sup>2</sup>	39.4dw/ha
Semi-detached Dwelling - Front Loaded	400m <sup>2</sup>	450m <sup>2</sup> 18m x 25m	144m <sup>2</sup>	594m <sup>2</sup>	33.7dw/ha

Studio Dwelling and Secondary Dwellings – Corner Lot	450m <sup>2</sup>	453m <sup>2</sup> 15.5m x 30m (5m splay)	376.5m <sup>2</sup>	829.5m <sup>2</sup>	24.2dw/ha
Secondary Dwelling	450m <sup>2</sup>	450m <sup>2</sup> 15m x 30m	120m <sup>2</sup>	570m <sup>2</sup>	35.1dw/ha

## 2. Residential development between the 1-in-100 Year and the Probable Maximum Flood levels

The proposed maps indicate the areas impacted by the Probable Maximum Flood (PMF) and limit residential density in these areas to 15-20dw/Ha, rather than 15-25dw/Ha. The total number of dwellings within this area is also capped at 2,000.

UDIA NSW notes that the Hawkesbury-Nepean Valley Flood Management Directorate's examination of flood scenarios and evacuation requirements is ongoing, and the current evacuation scenarios seem overly conservative, resulting in unreasonable dwelling caps. The evacuation scenarios rely on extreme events that are likely to occur once in 10,000-100,000 years, as well as making very conservative assumptions about warning times, resident volumes in the Precinct at any given time, and evacuation route decisions.

The result of this unreasonably conservative approach to flood management is a negative impact on housing supply and affordability, both by reducing dwelling densities, and applying additional built form controls that would add approximately \$20,000 to the cost of a dwelling in these areas. UDIA NSW recommends that consistent dwelling densities be applied to all land above the 1-in-100 year flood level.

We are concerned about the additional requirements for construction in the PMF, we believe this could lead to requiring full-brick construction that would add significant cost.

## 3. Open space and playing fields

The Precinct Plan acknowledges that more conservation areas, open space and playing fields are provided than are required to meet the demand generated within the West Schofields Precinct. This excessive provision reduces the potential housing supply in the Precinct. It also risks charging local infrastructure contributions for demand generated outside the Precinct.

UDIA NSW recommends that the provision of open space and playing fields in the Precinct be further reviewed so that local infrastructure contributions relate only to infrastructure demand from within the precinct, and every opportunity for additional dwelling supply is available.

This review should also recognise that the current use of sporting and recreation facilities in suburban areas is inherently inefficient. Except for evenings and weekends, most sports fields and ovals remain unused for the major part of the day.

Furthermore, in the North West Sector, there is a potentially large land bank beyond the boundary of the urban footprint, due to the presence of flood prone land, to

accommodate large areas devoted to sports and recreation use that are conveniently accessible. On this note, UDIA NSW recommends that the playing fields adjacent to the school site, which are partly above the PMF line, be moved to an area below the 1-in-100 year flood level to allow this land to be developed for housing.

#### **4. Indicative Layout Plan issues**

The ILP for West Schofields needs to learn from the mistakes made in previous ILPs that are continuing to complicate development elsewhere in the Sydney Growth Centres. In many instances ILPs are being treated as the rule, not a guide. Transport corridors need to be flexible so as not to negatively impact on development.

For example, 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.

Finally, the West Schofields Precinct ILP shows R2 zoned land beneath the transmission lines. This is incompatible with the current Transgrid and Endeavour Energy policies regarding acceptable land uses within their easements.

#### **5. Stormwater management**

The exhibited plans do not provide much detail on the stormwater management strategy for West Schofields. If the intention is not to detain stormwater in this catchment, how will the legal aspects of increasing discharge to downstream properties be addressed? This lack of guidance has the potential to lead to a proliferation of temporary detention basins, which reduces the number of lots available in the short to medium term, increases the cost of the remaining dwellings, and creates safety and amenity risks for the growing communities.

We would be pleased to meet with you to discuss this matter further. If you have any queries, please do not hesitate to contact Mr Sam Stone, Manager, Policy and Research, UDIA NSW on (02) 9262 1214 or at [ssone@udiansw.com.au](mailto:ssone@udiansw.com.au).

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.*