

30 May 2008

Mr Andrew Thomas
Manager City Plan Development
City of Sydney
GPO Box 1591
SYDNEY NSW 2001

Dear Mr Thomas

Re: Consultation pursuant to Section 62 of the Environmental Planning and Assessment Act 1979 – Comprehensive LEP for the City of Sydney

I refer to the above matter and to your correspondence of 28 April 2008 where comments from the Urban Taskforce were sought. Thank you for the opportunity to make this brief submission for your consideration.

The Urban Taskforce represents Australia's most prominent property developers and equity financiers. We strongly support efforts to simplify and clarify complex, often irrelevant planning regulation and congratulate the Council of the City of Sydney for taking these early and import steps to address this issue.

As these comments are not sought in reply to a formal exhibition of a Draft Planning Instrument, the Urban Taskforce would like to take this opportunity to make general comments related primarily to zoning philosophy. We encourage you to consider these matters as you progress in the plan making process.

1. Consolidation and Simplification

Having three LEPs is clearly not appropriate. Compliance with planning regulation within the Sydney local government area (LGA) is challenging enough without having to decipher requirements from three separate LEPs. Furthermore, the existence of 31 zones applying across one LGA is not appropriate. Under these circumstances, the Urban Taskforce encourages Council in its consolidation and simplification approach to local planning reform. Moving to one consolidated LEP containing only thirteen zones is in principle a great improvement. What will be permitted in the zones and their relationship to other zones is a different matter.

2. Keeping to Mandatory Zones and Zone Objectives

Clearly the intention of the standard instrument is to "standardise" local planning across NSW. This has numerous obvious advantages for consistent planning and development control across the State. It is noted that the City of Sydney may seek the consent for the introduction of an additional new Zone CC – City Centre to apply only to the City of Sydney. The Urban Taskforce does not see the need for such a zone, and instead supports the wider use of Zone B4 - Mixed Use as the alternative to the introduction of a new additional Zone CC-City Centre.

3. **Residential Development in the City Centre**

The Urban Taskforce strongly opposes any new zone that would seek to prohibit or discourage residential opportunities within the city centre. This not only goes against the intention of the consolidation process outlined in your correspondence of the 28th April, but is also an inappropriate use of this standardising process. Furthermore, if the Council is serious about creating a lively, active and safe city centre, then residential and retail must be permitted and actively encouraged.

The Urban Taskforce is passionate about initiatives that permit a land use mix. Many successful places include a mix of uses, including jobs, retail, entertainment and residential apartments all coexisting, working together to make a centre attractive and successful at all times of the day and week. Commercial cores without retail, entertainment and residential uses are lifeless, cold and uninviting places outside of business hours.

Limiting the City Centre to only commercial uses is an unnecessary and unimaginative policy. It is contrary to contemporary urban design philosophy, including the urban design principles so well articulated in *Sustainable Sydney 2030*.

While it is accepted that the Council has embarked on a "consolidation" and "compliance" process, the Urban Taskforce would encourage you to go further. That is, if you are to go through this torturous process, why not use the opportunity to properly and robustly assess the appropriateness of existing zones and consider whether these zones have successfully encouraged the development outcomes originally envisaged.

We are available to meet and further discuss these issues.

Yours sincerely

Urban Taskforce Australia

A handwritten signature in black ink, reading "Aaron Gadiel". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Aaron Gadiel
Chief Executive Officer