

26 June 2008

Mr. Sam Haddad  
Director General  
Department of Planning  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr Haddad

**Re: Further submission on the draft subregional strategies for metropolitan Sydney**

As you aware the property development industry has raised serious concerns over the direction being pursued by the Department of Planning via subregional strategies.

Eight subregional strategies have been released by the Department of Planning in draft form. We have made a submission setting out our views, *Getting Life's Essentials: Planning for where we will live, work and shop over the next three decades*. Our recommendations included the following:

- Each subregional strategy should incorporate a subregional and local government area target for shopfront space alongside the targets for dwellings and employment capacity.
- Provisions in the sub-regional strategies that attempt to separate retail uses from other uses should be abandoned.
- All four categories in the local centres hierarchy should simply be regarded as "local centres" and should permit the full range of retail premises.

We have said that the draft sub-regional strategies reviewed have serious flaws and if implemented as they are, will have profound adverse impacts for Sydney.

We have also released a report by Professor Allan Fels, *Choice Free Zone*, which found that policies such as those advocated by the draft strategies are costing the NSW economy more than \$78 billion in extra income and 47,000 jobs. A copy of this report is attached and forms a part of this submission.

We are writing to make some further comments on the draft sub-regional strategies.

**1. New "key direction"**

The subregional strategies strike at the heart of retail development in NSW. This is unfortunate as retail facilities have an important role in creating a sense of community and social interaction. Retail also contributes to a healthy built environment. The presence of retail improves the quality of the built environment for people. It encourages physical activity like walking and bike riding which can help in reducing obesity levels – the Urban Taskforce co-published a book on this subject, *Healthy Environments*, which was edited by Chris Johnson.

We support a planning scheme that permits the integration of housing, workplaces, shopping, and recreation areas into compact, pedestrian-friendly, mixed-use neighbourhoods. Pedestrian-oriented amenities such as retail and cafes should be

permitted as part of mixed use development areas of medium and high density housing and should not be discouraged or prohibited in centres of employment, including light industrial zones, general industrial zones, business development zones, neighbourhood centres and business parks.

We believe a new “key direction” should be inserted in each draft strategy to “facilitate compact, pedestrian-friendly, mixed-use neighbourhoods.” The key direction should require:

- councils to plan for sufficient zoned land (accommodate their local government area retail targets - as a minimum), including provision for business and retail premises, in the following zones: neighbourhood centre; local centre; commercial core; mixed use; business development; enterprise corridor; business park; general industrial; and light industrial.
- local environment plans are to permit pedestrian-oriented amenities such as retail and cafes as part of mixed use developments areas of medium and high density housing.

## **2. Bulky goods districts as centres**

The strategies' overly restrictive centres policy will result in existing places of commerce/retail, not identified as a “centre” in the sub-regional strategies, being severely and unfairly restricted. In this regard, we note that there are a number of locations where retail (bulky goods) is currently permitted, but such locations do not seem to be identified as being within a “centre.” For example, bulky goods retailing at:

- Taren Point Road, Caringbah;
- Rowood Road, Blacktown;
- Parramatta Road, Auburn;
- Condamine Street, Balgowlah Bulky; and,
- Hume Highway, Casula

all currently feature significant retailing activity, yet do not seem to be located within a defined centre. This means that retailing at these locations will not be permitted and/or will be severely restricted in the future. Furthermore, this will prevent expansion and/or intensification of these uses, regardless of demand. It will prevent these popular shopping districts from offering the opportunity to increase competition in the retail grocery market by including supermarkets.

On a broader note, it is generally unclear how the subregional strategies will deal with bulky goods retailing. For example, existing bulky goods centres along Parramatta Road, Auburn and the Caringbah SupaCenta, are identified as “industrial” land uses, not within a centre.

Furthermore, while appearing to be in a “centre,” bulky goods at Warwick Farm and Campbelltown seem to maintain an industrial land use designation. Furthermore it is apparent that in the case of Casula and Campbelltown, there is a deliberate attempt on behalf of the Department of Planning to further limit bulky goods retailing from these locations. Irrespective of their zoning, these areas are successful hubs of retailing activity and should be recognised as such.

If the primary purpose for a “centres” policy is to maximize the use of existing infrastructure, reinforce existing centres and the reduction of single purpose trips, particularly private motor vehicle, it is not logical that planning would seek to limit the type of retailing within established bulky goods centres. These centres are in existence right now and currently provide valuable goods and services to the community. The

public currently frequent these centres, but under current and proposed policy, will be denied the opportunity to access all types of retail. Planning seems to be actively forcing consumers back into their motor vehicle to make an additional trip. This makes no sense.

It is not logical that a person at a retail centre, shopping for home furnishings or computer equipment, is denied the right to purchase groceries from the same locality. Whether we classify it as bulky goods shopping or grocery shopping, surely we can agree that all are a form of retail and all should be permitted in the same location, particularly in those locations that enjoy substantial existing infrastructure and access.

It is noted that the Department of Planning have yet to release their Sydney City and Inner west subregional strategies. Existing bulky goods centres at Alexandria, South Sydney/Green Square and Moore Park should be recognised as centres of retail and commerce.

Our previous submission to the Department shows that the Sydney metropolitan area will need an additional four million square metres of occupied retail space by 2031 - a 50 per cent increase over current levels. We must ensure that the necessary retail floor space is as close as possible to where people are planned to live, work or travel in large numbers. This includes existing centres of retail activities, areas planned for higher residential density and areas planned for significant employment generation.

As the strategies effectively require any substantial growth in the retail industry to be in a limited number of "strategic centres"/"regional cities," a dramatic increase in congestion, without any change in direction, will result.

It is the view of the Urban Taskforce that implementation of the draft subregional strategies would be destructive to Sydney and NSW by:

- forcing people to make additional trips to meet their retail needs;
- denying future households the benefits of inexpensive full-line supermarkets; and,
- hampering the creation of more vibrant office parks with a wider range of services for the local workforce and community at large.

The Urban Taskforce is of the view that existing retail centres, bulky goods or otherwise, not identified as being within a centre and/or shown as an industrial land use, must be accurately defined and be given the status of a "centre" within the subregional strategies.

We urge the government to refrain from adopting any of the subregional strategies until there has been a significant review of the issues raised by the Urban Taskforce and further industry consultation.

Yours sincerely

**Urban Taskforce Australia**



Aaron Gadiel  
Chief Executive Officer

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