

3 August 2012

Mr Michael File
Director, Strategic Assessment
NSW Department of Planning and Infrastructure
GPO BOX 39
SYDNEY NSW 2001

E-mail: plan_comment@planning.nsw.gov.au

Dear Mr File

Re: Proposed Amendments to State Environmental Planning Policy (Major Development) 2005 Edmondson Park South State Significant Site

The Urban Taskforce represents Australia's most prominent property developers and equity financiers. We provide a forum for people involved in development and the planning of the urban environment to engage in constructive dialogue with government and the community.

The Urban Taskforce has reviewed the exhibited:

- Explanation of Proposed Amendments to State Environmental Planning Policy (Major Development) 2005 Edmondson Park South State Significant Site;
- SEPP (Major Development) AMENDMENT (Edmondson Park South) 2011 – Minimum Lot Sizes, justification prepared by JBA Planning dated 22 June 2012; and,
- Draft Edmondson Park South Development Control Plan 2012, 4 July 2012.

Having reviewed the exhibited material we provide the following comments for your consideration.

1. The proposed SEPP amendment will support housing variety

We understand that the proponent (JBA Urban Planning on behalf of Landcom) is seeking to amend the Major Development SEPP to reduce the minimum lot size permitted for dwelling houses and semi-detached dwellings within the R1 General Residential zone and for semi-detached dwellings within the B4 Mixed Use zone from 250sqm to 200sqm.

The Urban Taskforce supports a reduction in minimum lot size, to encourage the delivery of housing diversity that is responsive to market demand, by providing for an increased range of affordable housing choices at Edmondson Park South.

2. The proposed SEPP amendment will encourage efficient approvals

The Urban Taskforce supports the proposed SEPP amendment as it will ensure that the planning controls, that apply at Edmondson Park South, are consistent with the minimum lot sizes permitted for complying development established under State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (the Codes SEPP). We agree, that to provide for streamlined planning approvals processes and efficiency in housing delivery, the planning control framework should provide for minimum lot sizes that are consistent with and allow for use of the complying development regime under the Codes SEPP to the greatest extent practicable.

The Urban Taskforce is of the view that greater use of the Codes SEPP, enabling the majority of housing development proposals to be considered as complying development, will facilitate a more streamlined approvals process, enabling the efficient delivery of urgently needed housing to market.

3. Development levies must not exceed the cap of \$30,000 per dwelling or per residential lot

To encourage the delivery of affordable housing the government must continue to work on reducing development levies. The placement of a cap on development levies at \$30,000 for greenfield development was a good start. However, we argue that even with the introduction of the \$30,000 per dwelling or per residential lot cap on section 94 levies in greenfield areas, when added to the other costs associated with bringing land to market, the cost of producing lots may continue to be more than the market can afford, particularly in the affordable housing segment of the market.

We strongly argue for an element of market reality when determining development charges, particularly when preparing the contributions plan for Edmondson Park South. We are of the belief that this approach has not been previously adopted when preparing contributions plans for other precincts.

These comments are offered to encourage constructive dialogue between Government and the development industry and we ask that you accept these comments as our contribution to the planning process.

We are always able to provide a development industry perspective on planning policy and we would welcome the opportunity to meet and discuss these issues in more detail. Should you have any further enquires in relation to this submission please feel free to contact me on telephone number 9238 3927.

Yours sincerely
Urban Taskforce Australia



Chris Johnson
Chief Executive Officer