

17 October 2012

Mr Robert Black
Strategies & Land Release
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

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

Dear Mr Black

Re: Amendment to Schofields Precinct Plan - State Environmental Planning Policy (Sydney Region Growth Centres)

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 *Amendment to Schofields Precinct Plan - State Environmental Planning Policy (Sydney Region Growth Centres)* and accompanying planning reports. While we support the draft amendment to the SEPP, we take this opportunity to highlight the urgent need for flexibility in the areas of land use zoning, particularly when drafting planning instruments. That is, there would not be a need for this amendment if there was flexibility in permitted land uses in zoning tables and development standards, such as dwelling density, was not expressed as a minimum.

This amendment highlights the undesirable impact of planning regulation on development outcomes. In this case, the planning controls seek to encourage the delivery of housing, but because the controls do not meet market requirements, the exact opposite occurs and housing is not produced. It is interesting to note that in this instance a developer is seeking less density to meet market expectation, not more.

While we accept that planning regulation should strive for the efficient use of land, increasing density is not always the solution. Context and development feasibility is of equal importance. However, it is refreshing to see that the Government is prepared to openly review submissions made by landowners and amend its plans where necessary.

The Urban Taskforce has made numerous submissions to Government on the importance of flexibility and/or a more inclusive approach to land use and zoning. We advocate for a planning system that is capable of considering all types of land use, against a clear set of criteria. Outright prohibitions are not necessary if a zone is provided with clear objectives and a plan includes clear and reasonable development standards grounded by market realities and development feasibility. By adopting such an approach to land use and zoning allowance for unforeseen circumstances and innovation is built into the plan, removing the need for plan amendments for many cases.

We are always willing to provide a development industry perspective on planning policy and we would welcome the opportunity to discuss these issues with you 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

A handwritten signature in blue ink, appearing to read 'Chris Johnson', with a long horizontal flourish extending to the right.

Chris Johnson, AM
Chief Executive Officer