

Draft North District Plan

Submission_id: 31657

Date of Lodgment: 15 Dec 2017

Origin of Submission: Online

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Organisation type: Industry

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Submission content: Submission on behalf of EG Funds Management attached.

Number of attachments: 1

15 December 2017

Our Ref: 17-282 DR

Greater Sydney Commission

Draft District Plans

PO Box 257,

Parramatta NSW 2124

By email: submissions@gsc.nsw.gov.au

Dear Sir/Madam,

RE: REVISED DRAFT NORTH DISTRICT PLAN

Thank you for the opportunity to respond to the Revised Draft North District Plan. We are pleased to do so on behalf of EG Funds Management, which has property and investment interests across the Sydney Metropolitan Area.

Whilst our submission relates to district level considerations, we have sought to illustrate our comments by reference to the specific case study of the Pennant Hills local centre.

Summary

Our submission focuses on the role that "local centres" play in realising key planning priorities under the District Plan. In summary, our submission is that whilst the Draft District Plan, not unreasonably, leaves the planning of local centres principally in the hands of the relevant local Council, it is appropriate for the Commission to establish implementation guidance within the District Plan and maintain a 'watching brief' over the planning of local centres to ensure that important planning opportunities for the District are not diminished or lost.

The role of local centres in District planning

Whilst emphasis is placed in the Draft District Plan on the importance of Strategic Centres to the future planning priorities within the District, it also recognises the important role played by local centres; in terms of housing opportunities and creating great places to live and work. Local centres are the focal point of neighbourhoods and where they are a focus for public transport, they are an important part of a 30-minute city.

We agree with and fully support the priorities and objectives of the Draft District Plan as they relate to local centres (at pages 44 - 47).

Pennant Hills, and in particular the City View Road precinct, provides an excellent case study of the role a local centre can play in implementing several objectives of the District Plan.

Pennant Hills is ideally located along the Pennant Hills Road corridor, which provides opportunities for renewal leveraged off the significant public investment in NorthConnex (see Figure 1).

Pennant Hills local centre appears more appropriate and has greater capacity than other centres along this corridor to be a focus for more intensive, mix use development. Reasons include that:

- It is serviced by the recently upgraded Pennant Hills Rail Station and a bus interchange.
- It is located centrally between the Strategic Centres of Hornsby and Epping.
- It is already a well developed centre, at the larger end of the scale of local centres generally, with mid-rise buildings and a mix of office, commercial and residential uses.
- Well established office-focused areas, such as the City View Road precinct in the south-western part of the centre, contain large sites comprising mainly office buildings nearing the end of their economic life, some of which have been vacant for some time. This particular discrete precinct is approximately 3.0ha in area, bounded by Pennant Hills Road and a rail corridor. It is within a walkable distance to key transport nodes and has obvious re-development potential for mixed use purposes at higher densities.
- These attributes present significant (transit oriented) development opportunities within 400 metres of the Station.



Figure 1: Pennant Hills local centre land use pattern (Source: EG Funds Management)

In summary, Pennant Hills is a model example of the type of local centre that can make a significant contribution towards meeting the priorities and objectives of the Draft District Plan, implemented via the place-based planning approach identified in the Draft Plan.

Hornsby Council has recognised the potential of Pennant Hills local centre for renewal and growth and is currently undertaking a strategic review of the centre under the banner of "Picture Pennant Hills".

Potential for local centre role to be undermined

Our principal concern is not with the identification of the role and objectives for local centres in the Draft District Plan, but with the potential for the implementation of those objectives to be unnecessarily constrained or thwarted by some local Councils.

As indicated, it is reasonable that Councils are primarily responsible for the planning of local centres. However, there is the very real potential for local political or other factors to impose themselves on the planning process to an extent that may constrain or thwart the realisation of the development potential of highly suitable local centres.

This may occur because of vocal local communities objecting to **any** change to their centre, regardless of the planning merit. Also, some Councils take the attitude that their housing and other targets are capable of being met by their existing polices and no further locations, regardless of their planning merit, are necessary to be considered.

If this occurs, it may lead to the potential for local centres to not adequately leverage off public infrastructure investment (such as Northconnex or Rail upgrades). If not allowed to develop to their optimum potential, under-development may occur in the short to medium term, which may represent a loss of a whole building 'life-cycle' (20+ years), before 'optimised' development can occur.

This then places greater pressure on less well located areas to 'pick up the slack' in terms of meeting employment and housing targets. Also, the attitude of some Councils in not seeking to zone more than the bare minimum of land necessary to meet targets presents the real prospect of those targets not actually being met for a range of reasons. This can also impact on affordability by artificially constraining the supply of well located land for redevelopment.

The potential of these outcomes to occur leads us to believe that an entirely 'hands off' approach by the government to local centre planning could have significant consequences for District and Regional planning and implementation.

Recommended provision for local centre planning proposals

To reduce these potential consequences, we recommend the inclusion of additional commentary in the final District Plan to the following effect.

Planning proposals within a local centre or within the identified walking catchment around that centres (refer Figure 16), that contribute to the supply of housing and jobs, are encouraged and deemed to meet the Strategy Merit Test, whether or not that local centre is identified within a local housing or jobs strategy.

Such planning proposals will remain subject to other suitability factors that may exclude them for other valid reasons, but will at least prevent otherwise meritorious planning proposals being summarily refused on spurious grounds.

Local centre land use zones

Another aspect for consideration relates to simplified and more flexible business zones within local centres. Again, using Pennant Hills as the example, there are 3 different business zones within the town centre (B2, B5 and B6) and a residential (R4) zone, as shown in Figure 2.

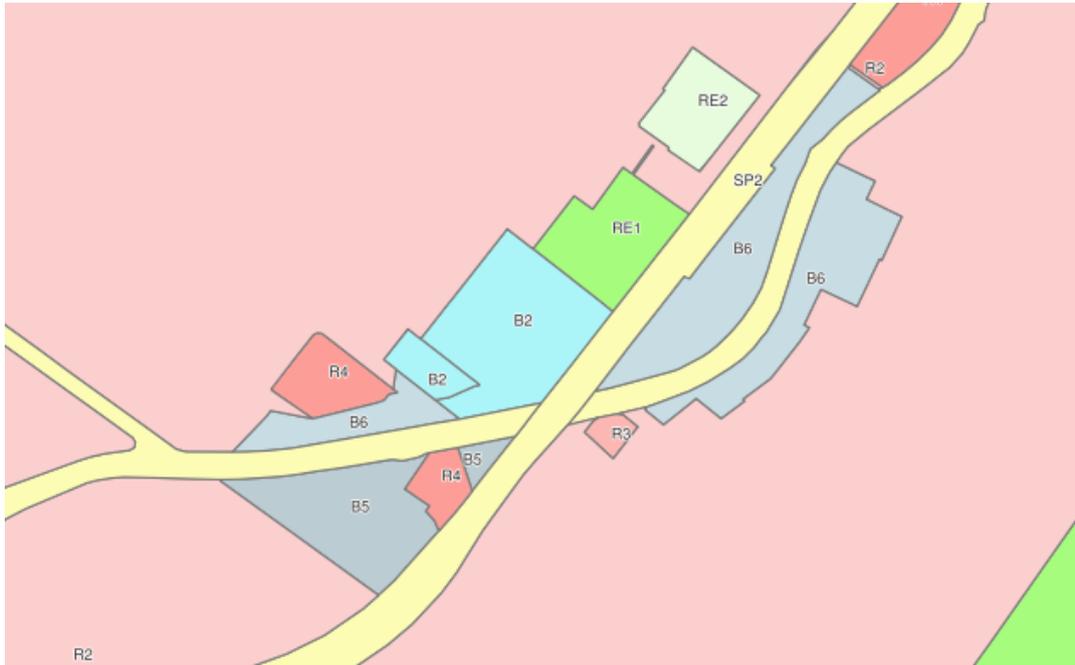


Figure 2: Pennant Hills local centre land use zoning map (Source: NSW Planning Portal)

Under the Hornsby LEP, these zones permit and prohibit an esoteric range of uses where it is difficult to discern the planning intent or necessity behind the differentiation.

In the B5 and B6 zones for example, the permitted and prohibited uses are broadly similar and allow residential dwellings only as shop top housing above an eclectic range of commercial premises, but not above general shops, unlike the B2 zone. Because of the Standard Instrument definition of shop top housing, none of the zones allows dwellings above office premises. None of these restrictions appear logical or appropriate for a local business centre within 400 metres of a heavy rail interchange.

Whilst something of a mechanical measure more in the purview of the Department's planning policy sections, it may nonetheless be appropriate to include commentary in the District Plans that promotes flexible and facilitative business zones within local and Strategic Centres, rather than overly detailed and unnecessarily prescriptive zones.

Again, this is aimed at ensuring that local centre planning controls are conducive to those centres realising their important role as described in the Draft District Plan.

Thank you for the opportunity to comment on the Draft District Plan. We would be pleased to clarify or provide further information in relation to any of the matters raised in this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Ryan', with a stylized flourish at the end.

David Ryan
Executive Director