

9 November 2018

Ms Carolyn McNally  
Secretary  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001



Dear Ms McNally,

## **Re: Draft Lowes Creek Maryland Plan**

The Urban Taskforce thanks the Department of Planning and Environment (the Department) for the opportunity to comment on the Draft Lowes Creek Maryland Plan (the draft Plan). Our comments are provided below for your consideration.

### **Indicative Layout Plans should not be used as prescriptive plans**

Some of our members have told us that local councils are not using the 'indicative layout plans' (ILPs) as 'indicative' plans, but are treating these plans as hard-and-fast rules which must be adhered to in an inflexible manner.

As development applications are lodged, councils are reluctant to permit even small modifications or deviations from the ILP, and where flexibility is allowed, justification to make the amendment requires extensive lengthy studies and reports, for what is in the vast majority of instances relatively minor adjustments to road layout, configuration and drainage basin sizes.

The ILPS were never intended to be used as a prescriptive document. The ILPs were intended to provide flexibility to ensure factors, such as market preferences and demand; project staging and duration, technological changes, socio economic and demographic change and community values and expectations could be accommodated over time.

We request that:

- the Department provides guidance to instruct local councils on the 'indicative' nature of ILPs, through a Practice Note or Planning Circular, or
- fine grain details be excluded from ILPs.

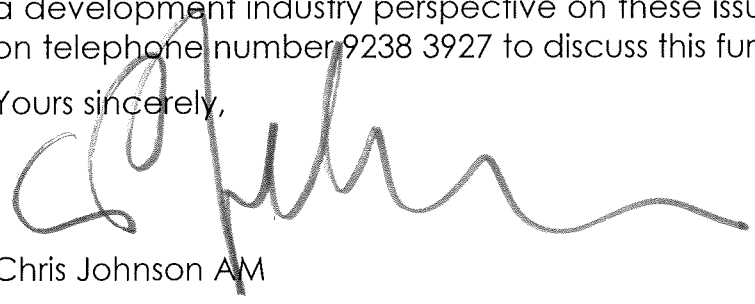
### **The Urban Development Zone should be adopted in future greenfield precincts**

The NSW Department of Planning has successfully applied the 'Urban Development Zone' in the Wilton New town Priority growth Area. This flexible zoning will enable this precinct to respond effectively to changing circumstances without requiring a drawn out and cumbersome amendment process.

We highlight the importance of flexible and innovative approaches to zoning and recommend that this approach to adopted to all future growth centre precincts.

The Urban Taskforce is always willing to work closely with the Government to provide a development industry perspective on these issues. Please feel free to contact me on telephone number 9238 3927 to discuss this further.

Yours sincerely,

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

Chris Johnson AM  
Chief Executive Officer  
**Urban Taskforce Australia**