Urban Taskforce
AUSTRALIA

6 February 2024

The General Manager
Camden Council
70 Central Avenue
ORAN PARK NSW 2570

cc The General Manager, Liverpool City Council

Dear Sir/Madam

re: Leppington Town Centre Planning Proposal

Urban Taskforce Australia welcomes the release and public exhibition of the Leppington Town Centre Planning Proposal conjunctly by Camden Council and Liverpool City Council as a significant step in finally delivering on the potential of the site.

Since the 2013 rezoning, the town centre has stagnated, with a lack of private sector interest in the B7 Business Park zone.

This Planning Proposal's move towards increased mixed use and residential development, increased yield and greater certainty for investment through the introduction of floor space ratios, along with flexibility in height to achieve floor space bonuses in term of low carbon buildings and affordable housing components, is a significant step forward in realising the potential of Leppington for the region and indeed all of Sydney.

Leppington Town Centre is a unique site – serviced by a heavy rail station with no sensitive receivers whose amenity would be impacted upon by development. If there was a site in Sydney where boldness should direct the planning process, then the Leppington Town Centre site is it.

With the Minns Government's focus on transport-oriented development, the Leppington Town Centre is a blank canvas which is ideally placed to capture and demonstrate the values of civic, commercial and residential development around major transport nodes. With the potential to provides homes for 26,000 people and provide for 11,000 new jobs, it is critical that the planning framework is right and facilitates these targets.

In terms of the Councils' planning proposal, Urban Taskforce broadly supports the vision and purpose of Leppington, the density and heights proposed, and

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the recognition that there is a need for a lead developer to establish the town centre to kick start the development of surrounding land.

This is a key principle that should underpin the Planning Proposal. For Leppington to fulfill its potential in terms of housing and jobs, it needs a beating civic heart to provide residents with the retail, commercial and other essential civic services. In many ways, the development of nearby Edmondson Park provides a template for how Leppington should develop and mature.

Acknowledging the key role that must by played by a lead developer in transforming Leppington, there are several aspects of the Planning Proposal that must be revisited to ensure the feasibility of development adjoining the rail station, and to create a modern, functional civic heart that works form a planning and urban design perspective.

1. **Proposed contributions and cumulative impact of contributions of the feasibility of development**

The local contributions proposed in the Planning Proposal are too high and will make the development of the town centre unfeasible. The proposal envisages the acquisition of 82 hectares of land for open space.

In order to fund this, a proposed developer contribution of $52,000 for apartments and $92,000 for townhouses/houses is proposed. These local contributions are on top of the Housing and Productivity Contribution of $10,000 per unit and $12,000 per detached housing, as well as Sydney Water's $15,000 DSP charges.

The cumulative impact of these charges threatens the economic feasibility of development in and around Leppington. Council must revisit the quantum of developer contributions. Previous reports prepared for Council reports conclude that feasibility of development at Leppington is predicated on a local developer contribution no more than $20,000 per unit is required. This is in keeping with Council's existing contribution's plan which has been approved by IPART. The figure accords with Council's own feasibility study in 2021 which tested feasibility at the $20,000 mark. It should be noted that since 1991 market conditions have deteriorated significantly.

Recommendation 1: that Council retain the existing developer contributions rate of $20,000 per unit

2. Excessive open space requirements

There is an obvious remedy to reduce the level of local developer contributions through reducing the excessive open space requirements contained within the draft Planning Proposal.

The inclusion of 82 hectares of open space in draft Planning Proposal (82 hectares of which will need to be acquired by Council) is excessive, adds to the costs of development, undermines feasibility, and above all else will work against the aspirations of a functional, vibrant and safe civic centre.

The 88 hectares of open space translates to 3.7 hectares of open space per 100 persons, assuming that development of the Leppington Town Centre results in Council's proposed 20 year population target. An antiquated approach historically would call for only 2.83 hectares per 1,000 persons, and would not be based on an uncertain 20 year population forecast.

Council should consider the previously DPE supported approach of 15% of site area, or the current being performance-based approach to open space which moves away from the quantification of open space altogether.

In addition to the cost of acquiring open space, there are concerns that the excessive amount of open space works against efforts to deliver a vibrant town centre adjoining a train station. The 70 metre-wide north south link directly south of the station needs to be reconsidered. This expanse will frustrate the development of the civic heart of Leppington, where 70% of the total site would need to be acquired, making the residual land unviable.

Further, it is unnecessary and will actually work against the creation of a vibrant town centre. The quantum of open space was excessive for a town centre setting, particularly a setting adjacent to a train station.

- The excessive provision of open space would reduce ground floor activation and vibrancy, as the proposed width would act as a barrier to the retail uses on the ground floor splitting the town centre into two separate retail sections.
- A 70m north south link in Leppington's civic and retail heart without sufficient canopy coverage could result in increased urban heat and decreased activation around the train station.
- Limited activation and opportunities for passive surveillances would result in sub-optimal Crime Prevention through Environmental Design (CPTED) outcomes. Particularly at night the width of the open will be a significant CPTED issue where pedestrians are not afforded safe passive surveillance from either side. This will be an issue for commuters leaving the train station and could facilitate anti-social behaviour.

Civic design, savings for Council and improving the feasibility of the development of the Town Centre can be achieved through reducing the open space requirements. This is a critical flaw in the draft Planning Proposal that must be addressed.

Recommendation 2: that Camden and Liverpool Council review the open space requirements contained within the draft Planning Proposal with a view to reducing the developer contributions and enhancing the civic design of the Leppington Town Centre

Recommendation 3: the Council work with developers on alternate proposals for the open space network within the Leppington Town Centre

3. Roads need to match cadastral boundaries

Another fundamental flaw in the draft Planning Proposal is that the land uses and roads do not align with cadastral boundaries. The layout proposed in the Planning Proposal does not follow established lot boundaries and bisects differently owned properties.

Should the road network proceed in accordance with Councils' draft Planning Proposal, it would result in the severance of key lots, with portions of some of these left undevelopable. This would create a fragmented town centre and work against the overarching vision for Leppington Town Centre.

Further there is too much prescription in the road network layout, which are set in stone through FSR's of 0:0 being allocated upfront. There needs to be a more flexible approach where the road network is designed to service the needs of a functional and vibrant town centre, not the other way round.

Recommendation 4: the Council amend the Planning Proposal to ensure roads and land uses are in alignment with cadastral boundaries

Recommendation 5: the Council remove the level of prescription for the road network in Leppington Town Centre and works with landholders in designing an appropriate network for the Town Centre, with the proposed road layout to be embedded within the respective DCP objectives so that detailed DA design can produce the best functional outcome for the site.

4. Inconsistency between LEP heights and DCP heights

Urban Taskforce notes inconsistencies of building heights as set out in the LEP as opposed to the DCP. Council should look at changing the LEP heights to be consistent with those in the DCP.

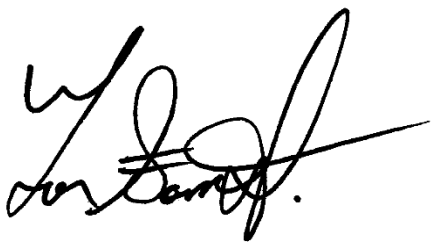
The proposed DCP provides a range of preferred number of storeys/levels, cannot be achieved under the LEP proposed height limits. Currently if you utilise the LEP's maximum height limit, only the bottom range of the DCP's preferred number of levels/storeys range can be achieved. This would require a minimal number of retail and commercial levels, that traditionally would need greater floor-to-floor heights than residential. If a developer was to incorporate more commercial levels in the lower portion of the building, then even the bottom range of the DCP preferred number of levels/storeys could not be achieved.

Flexibility when it comes to building heights allows for greater building articulation, reduces building mass, and will ultimately lead to better building design outcomes such as cross ventilation and solar access.

Recommendation 6: that Council amend the heights included in the LEP achieve consistency with those proposed in the DCP in order to allow for a more flexible approach to height and deliver better design outcomes in the town centre

Should you wish to discuss this matter further, please call our Head of Policy, Planning and Research, Stephen Fenn on 9238 3969 or via email stephen@urbantaskforce.com.au.

Yours sincerely



Tom Forrest
Chief Executive Officer

Recommendations

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