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Mr Marcus Ray
Group Deputy Secretary Planning and Assessment
NSW Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Marcus,

ECONOMIC STIMULUS THROUGH THE PLANNING SYSTEM

As the unprecedented challenges and uncertainties affecting our society unleashed by COVID-19 unfold, it is imperative to take decisive action to stimulate the economy and to supercharge the opportunity for recovery.

Planning plays a crucial role in ensuring sustained economic growth. Collectively, as Planners, we have significant influence and capability in implementing actions that offer immediate and long-term benefits for industry and the entire community.

Urbis, as a leading national urban planning firm, is well placed to understand the complexities and inefficiencies in metropolitan and regional planning and the subsequent impacts on our industry. We put forward for consideration below, some options for 'easy wins' to stimulate the planning system, facilitating development projects to get moving now and continue beyond the current crisis.

FAST TRACK E-PLANNING & NEW TECHNOLOGY

In recent years the ability to work remotely, lodge development applications online and stream council and panel meetings has been vastly enhanced. However, these services now play a crucial role in how our industry will remain viable and we believe it is vital to:

- Channel as many resources as possible into e-planning to get it up and running to its ultimate level of efficiency.
- Seek assistance from large technology firms (Microsoft/ Amazon/ Google) to identify if there are possible temporary secure online server solutions that can be established quickly to enable Councils to move onto the cloud and facilitate remote working.
- Mandate all Sydney and Regional Council's sign up to use the DPIE planning portal immediately for development application (DA) lodgements. July 2020 is too long to wait for this considering the current situation.

PRIORITISE STRATEGIC PLANNING FOR PRECINCTS

Now more than ever, strategic planning, particularly Precinct Planning can help to fast track and stimulate development throughout Greater Sydney and NSW. Some suggested options include:

- Continue to resource the DPIE Western Sydney team so that they can deliver strategic plans such as South West Growth Area LUIP, Greater Penrith to Eastern Creek (GPEC) and the next stage of Greater Macarthur.
- Complete planning and supercharge strategic change for State-led Precincts, some of which have been stuck in the system for many years, such as Macquarie Park and Sydenham to Bankstown corridor.
- Unlock Parramatta Road Corridor to deliver its urban renewal potential by completing the necessary traffic studies and strategic planning.
- Provide timely resources to Councils to complete Council-led Precinct Plans or return these to the State to be finalised
- DPIE to prioritise working with Councils to facilitate local planning controls following the collaboration area planning process to enable lodgement of DAs for projects in line with the new regime in these priority areas.
- Mandate that councils progress strategic studies (not yet prepared or completed) that are identified as needed by their Local Strategic Planning Statements.

FLEXIBLE CONDITIONS OF CONSENT

In these times of uncertainty, enhanced flexibility in consent conditions should be implemented to ensure approved development opportunities are maintained. Measures include:

- Extend validity of consents by at least one year to account for delays in starts.
- Introduce more flexible hours of operation.
- Extend permit dates so that cancelled or postponed events can occur later without seeking further approvals.
- Require councils to review and reduce the standard suite of conditions of consent. Conditions should only be applied as they relate to a DA.
- Mandate the opportunity to review draft conditions of consent to remove the need for minor planning applications to resolve / correct errors.
- Provide standard SSD consent conditions for infrastructure, such as schools, to help guide thresholds and reduce delays.

CLARIFY COSTS AND CONTRIBUTIONS

We have witnessed in past times of economic uncertainty, the dramatic negative impact that contributions/levies and associated development have on project viability. We believe it is appropriate to:

- Delay the removal of the cap on s7.11 plans by a minimum of 12 months.
- Postpone the payment of s7.11 and s7.12 payments until final or whole Occupation Certificates are issued.
- Finalise draft Special Infrastructure Contributions (SIC) which have been exhibited or completed.
- Consider a SIC subsidy in Greater Macarthur and Wilton Growth Areas to stimulate new development in these areas.
- Investigate re-introducing the 'satisfactory arrangement' provisions into relevant EPIs to manage the delivery of key regional infrastructure, in the interim.

EFFICIENCIES IN THE SYSTEM

Fast tracking planning approvals, simplifying definitions and ensuring timely decision making can dramatically improve project viability. Options to introduce improved efficiencies include:

- Prioritise and fast track:
 - development assessment processes.
 - critical infrastructure projects, such as schools and hospitals.
 - critical logistics infrastructure to enable supply chains to work more efficiently and build additional capacity.
 - site compatibility certificates for existing Registered Clubs that have been forced to shut down.
 - DAs for critical tourism sites/uses for the state that have been impacted by bushfires and now COVID-19.
- Amend the definition of shop top housing making it more flexible with uses on the ground floor, given the difficulties to secure retail and business premises tenants in the current climate.
- Facilitate rezoning of industrial land to service warehouse and distribution demand. A lack of zoned and serviced land turns investors away.
- Increase the extent and coverage of what is considered complying development.
- Reduce requirement for printed documentation associated with development applications and ensure consistency across jurisdictions on the supporting materials required.
- Restrict delays from concurrences – there should be a maximum time for a concurrence to occur (say 28 days), otherwise there should be assumed concurrence.



- Independent panels should be consistent through the planning proposal process and to be restricted to one panel. Presently, there is the potential for up to five approval/referral panels (including a Design review panel) through the path of a planning proposal.
- Review of the SEARs requirements by providing more tailored and shorter requirements for SSDAs. Agencies should be held accountable for their SEARs and not overburden requirement for projects following the SEARs stage for infrastructure such as schools.

CONCLUSION

The planning system has a significant role to play in removing impediments to sustained growth which is now so important for our future.

At Urbis we view that multiple, small wins which can be explored and implemented to guarantee the continuation of important housing and employment generating projects, for the benefit of the community.

Urbis looks forward to the contributing further to discussions around this difficult situation. Please don't hesitate to contact me for clarification or input.

Yours sincerely,

A handwritten signature in black ink, appearing to read "John Wynne".

John Wynne
Director

CC: Juliet Grant, PIA NSW President