

28 October 2024

Mr Matthew Stewart
Chief Executive Officer
City of Canterbury Bankstown Council,
PO Box 8
Blacktown NSW 1885

RE: Belmore and Lakemba TOD Alternative – Public Exhibition

Dear Mr Stewart,

The Urban Development Institute of Australia NSW (UDIA) is the state's leading development industry body. We represent the leading participants in the industry and have more than 450 members across the entire spectrum of the industry including developers, financiers, builders, suppliers, architects, contractors, engineers, consultants, academics and state and local government bodies.

UDIA NSW invests in evidence-based research that informs our advocacy to state, federal and local government, so that development policies are developed to best meet user needs and ensure critical investment is directed to where they are needed the most. Together with our members, we shape the places where people will live for generations to come and in doing so, we are city shapers.

UDIA NSW welcomes the opportunity to make a submission on the Belmore and Lakemba Transit Oriented Development (TOD) alternative, that City of Canterbury Bankson has placed on public exhibition. UDIA NSW is supportive of Councils approach to undertake detailed studies to support proposed development uplift in the centres of Belmore and Lakemba. The proposed strategy provides a coherent clear plan and is very detailed with supporting studies include plans for community infrastructure. This allows developers and the community to understand exactly what to expect for the area.

In preparing a submission we have had an opportunity to canvass the proposal with our members who have experience with infill development across Sydney, and they have provided the following feedback structured under headings.

The plan proposes to switch off the Low-Mid Rise and Affordable Housing bonus provisions

UDIA NSW supports the plan to switch off the Low-Mid Rise and Affordable Housing bonus provision on the basis that the plan (a) significantly upzones land within both centres above what would otherwise be achievable; and (b) that if any sites are not upzoned to match the provisions of Low-Mid Rise and Affordable Housing bonus provision, then the proposed TOD or Low-Mid Rise provisions are adopted instead of the Council plan. This enables a clear plan and signal for developers and the community and improves feasibility through uplift measures.

Opportunities for main streets to have higher density

The plan would benefit from a bolder approach with higher densities for the two primary high streets, Burwood Road and Haldon Street, and along the main arterial road, Canterbury Road. These streets could accommodate more density due to good accessibility and in the case of Canterbury Road, being in strong need of significant urban renewal. Canterbury Road is also positioned on a ridge line and benefits from local topography to maximise development that will benefit from district and city views.

Open Space

Council should confirm that recreation needs have been adequately captured with the proposed uplift, density and open space plans. It is recommended that Council updates its Recreation Needs Research to confirm the amount and typology is adequately captured. Council should also investigate place making opportunities with markets, events and festivals located near stations and along main streets as part of this research and strategy development.

The configuration of key public spaces near the transport nodes could be developed to maximise town squares with community space, retail and open space. Pushing the development to the edges of the open space opportunities, which can also facilitate strata renewal and ADG separation requirements.

Delivery Mechanism for Affordable Housing

An affordable housing monetary contribution should also be offered as an option for developers, in lieu of a fixed percentage provided on a site, ensuring flexibility.

Building Heights

The Council should consider stepping heights on interface areas where there is a dramatic drop in height between city blocks. In addition, as noted previously each of the main streets, Burwood Road and Haldon Street, as well as Canterbury Road should accommodate higher building heights, to ensure urban renewal and development feasibility.

Built form approach

Other than items already noted, UDIA NSW acknowledges that the plan provides good built form outcomes, recognising that some key sites near stations (especially the Canterbury Leagues site) as having capacity for uplift.

Feasibility testing

It is recommended that further research and testing is undertaken to ensure that the proposed planning measures have been developed with the ability to deliver built outcomes in the current economic market. We recommend this testing is used to inform potential amendments to heights and FSR, specifically in key locations such as mains streets and Canterbury Road.

UDIA NSW welcomes the opportunity to provide this submission and provides an offer to Council to meet and discuss this feedback in further detail. In the meantime, if you need anything, please feel free to contact me directly or David Petrie, Director Infrastructure at dpetrie@udiansw.com.au or on 0447 646 202.

Kind regards,

A handwritten signature in black ink, appearing to read "G. Melvin".

Gavin Melvin
Executive Director Policy, UDIA NSW