

Certainty and outcomes: some local planning illusions

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Abstract; The most common definition of planning involves the deliberate achievement of some kind of predetermined outcome and the process required to achieve it. This would normally require the monitoring of the means necessary to achieve the desired ends to determine if they were effective. The determination of the relationship between the intention and the outcome would therefore help to establish the certainty there might be in the process itself. An area where one kind of certainty can be identified, relates to the achievement of the outcomes desired by the statements in planning documents (usually non-statutory Development Control Plans (DCPs) in NSW) which describe what is to be achieved, often in detail. Here it can be seen that the eventual outcome can fall well short of the original intention whose aims may be compromised during the process of implementation. There are many reasons for this but it might be considered a failure of the planning process operated by local government planners where what is intended in the plan does not materialise. This paper examines an ongoing development where the result differs from that described in the plan suggesting that even close to its completion, the process can result in something different from that anticipated suggesting that greater care is required both in the definition of the aims of the process and in the management of the procedures applied to achieve them.

Key words; Centre hierarchy, development control plan, retail studies, design framework, development outcomes

Introduction

It is a long standing criticism of the planning process that the connection between policy and its practical outcome is difficult to identify (Reade 1987). This might be considered to be a serious flaw as an important purpose of planning is claimed to be the achievement of a predetermined outcome sometimes considered to be of a kind beneficial to the community. If this link cannot be discerned or its results are difficult to predict, the process would appear to have lost some part of its justification (Hall and Tewdwr-Jones 2011). There is also the curious conundrum which applies to the manner in which planning policy is nowadays translated into physical outcomes by an almost exclusive reliance on the capitalist market in the form of the commercial property industry. This is the predominant means for planning to achieve its aims (HM Treasury 2006, Australian Productivity Commission 2011). As the powers available to the planners are essentially restrictive and regulatory rather than generators of development, this presents serious problems except where they coincide with the demands of the market place (Taylor 2005, Cullingworth and Nadin 2006). Planning therefore, by definition must align itself with developer's interests if it is to attempt to achieve its aims (Pickvance 1977, Healey *et al* 1995). At the same time these aims are necessarily conditioned by reliance on those interests.

There are some occasions when the physical outcome of the planning process can be identified on the ground and comparisons made between what was considered to be desirable at the outset and what eventuated following implementation. Unlike policy outcomes where there are difficulties related to isolating the effects of a single initiative within the complexity and potential contradictions of urban policy implementation, here it is possible to identify both the aim and the outcome and determine their relationship.

In specific cases, this can be examined in order to determine the validity of the claims for certainty attached to the achievement of a pre-determined outcome; what is defined in the plan will be achieved on the ground. Alternatively, any claim for certainty at this stage of the planning process might only relate to the achievement of an approval for a proposal which may only bear a distant relationship to the intention of the plan. The result of this assessment can provide an indication of the validity of any link between intention and achievement allowing a judgement to be made on the effectiveness of the planning process in achieving what it set out to do.

The project analysed here comprises the Wrights Road Centre, located close to the geographic centre of an almost completed, low density residential area immediately to the west of the centre of Castle Hill. This is an established area, formerly close to the north-western boundary of the Sydney Metropolitan Area but now located towards the southern edge of the North West Growth Centre, some 30 kilometres from Sydney CBD. It is an early example of recent greenfield development which, with

some changes has set the pattern for the extensive urban growth taking place on Sydney's fringe. While this example is essentially local and the factors relating to its outcome quite specific, the principle embodied in the expectation that the stated intention for future development should be reasonably accurately translated into the physical provision as the product of the planning process has implications for the way in which urban development is conceived and managed. The location of the site is shown in Figure 1.



Figure 1 Site location

The site comprises three equally sized, separately owned blocks of land making up a total area of just over six hectares, approximately five of which were available for development. Wrights Road provides the main frontage and access is also available from York Road, newly constructed along the western boundary of the site. There is no access available from the remaining two sides. Issues relating to access proved to be a problem during approval and implementation and have not been adequately resolved subsequently.

Two thirds of the site was developed between 2002 and 2003 while the remaining third along the eastern boundary remained vacant. This was bought from Council in 2008 for development but was subsequently subdivided into two lots in 2012 and approval given for a small retail development along the Wrights Road frontage in 2013. The remainder of the site is subject to a current planning application.

There are four main issues which have had an influence on the outcome of this development:

- apparent confusion over the status of the centre resulting from continuing changes in the definition of the retail hierarchy in Sydney;
- inability of the council to locate any of the range of social facilities in its control which were originally intended to create the core of the centre and provide some necessary variety of content;
- compliance with few of the design-related requirements set out in the relevant Development Control Plan was achieved in practice; and
- failure to consolidate the three separate blocks of land and establish control over the whole site rather than deal with each separate land owner in an attempt to achieve a coherent centre out of three opportunistic proposals.

Each of these relates to the day-to-day practicalities of planning; an area which tends to be overlooked in planning theory, although a deeper understanding of what the practitioners actually do, and why, might be expected to provide a clearer perspective on realities within a rapidly changing context.

Background

The population of the surrounding area, Kellyville, was 20,341 at the 2011 census, some 12% of the total population of The Hills Local Government Area and growing rapidly over the previous twenty years. The population is dominated by couple families with children (65.7%). The area would be considered to be prosperous with high proportions of professionals and managers within the workforce and a correspondingly low level of unemployment. The environment is that of a low density residential suburb with an astonishingly high proportion of detached houses (96.1%), predominantly large, with 82.9% of occupied private dwellings with four bedrooms or more. Some 26.9% of these were owned outright and 57.8% owned with a mortgage. Only 14% were rented.

The need for a Kellyville District Centre was first identified in a Retail Development Strategy prepared for the release area in 1989 (Department of Planning 1989 cited in Baulkham Hills Shire Council 1994). This centre was expected to comprise 15,000-20,000 square metres of retail and services floorspace including a range of retail facilities, banks, a medical centre, service station and recreational facilities. This is the initial prescription for the centre at Wrights Road.

The council commissioned a study of retail and commercial centres for the whole shire (now The Hills Shire) in 1997. This has provided the basis for centre development pursued to date although not without changes to the strategy recommended in the report (Leyshon Consulting 1997). The subsequent period has seen the consolidation of Castle Hill Centre (Castle Towers), currently awaiting long delayed, substantial expansion, and the development of Rouse Hill Centre as the two major centres in the area.

More detailed proposals for the centre appeared initially in two draft Development Control Plans for the President Road and Victoria Road Neighbourhoods respectively in November 1994 (Baulkham Hills Shire Council 1994a, b). Here it was designated as the Kellyville District Centre located on the southern boundary of the proposed President Road Neighbourhood fronting Wrights Road. Public open space and Town Centre Density housing are shown immediately to the south along the northern boundary of Victoria Road Neighbourhood separated by Wrights Road.

A design framework was included showing the general arrangement with the commercial (supermarket/retail/shops) section and its associated parking and access arrangements much as has been implemented. Immediately to the east a square is proposed providing a central space for community and additional retail facilities located to the north and south. Community facilities would have included a long day care centre, youth centre and possibly a community health centre (Baulkham Hills Shire Council 1993). There is a bushland strip to the east of the site separating it from Green Road, a busy arterial. The text indicates that the core of the centre should focus on the public square and the public facilities providing a civic space and a focus for the development. While the Wrights Road centre maintains its place in Council's DCP to this day with its objectives and development controls intact (The Hills Shire Council 2011), the design framework has not survived beyond the first attempt in 1994. The original is shown in Figure 2.

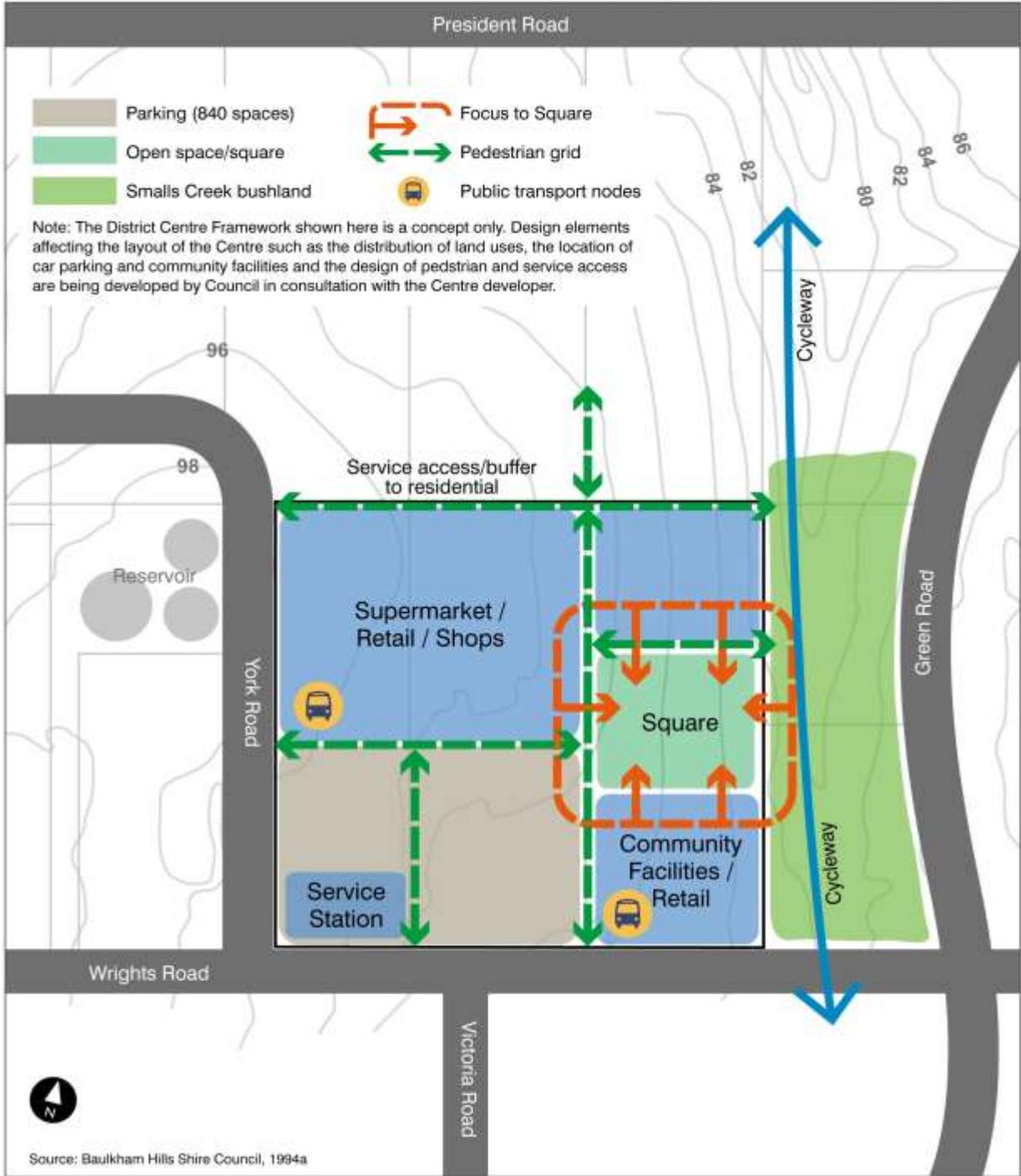


Figure 2 Development control plan

Hierarchy of Centres

The Wrights Road centre is described as a Town Centre in the hierarchy included in the *Draft Local Development Strategy* and is shown optimistically as of similar significance to the existing centres at Baulkham Hills (recently redeveloped), North Rocks and Carlingford (Baulkham Hills Shire Council 2008). Each of these comprises an internal self-contained mall focussing on one or both of the main supermarkets with a significant number of specialist shops, cafes and social and community facilities. Each has multi-storey covered car parking.

The typology of centres provided in this strategy is based on that in the 2005 Metropolitan Strategy listing the features generally considered to be necessary for a centre at that level in the hierarchy. A Town Centre is expected to be located at a transport node and contain at least:

- retail facilities meeting weekly shopping needs;
- services and facilities including Council branch library, banks, post office, private recreation such as a gym, community centre;
- medium and higher density housing including seniors living and affordable housing;
- pedestrian accessible and convenient car parking; and
- schools and medical practitioners within the vicinity of the centre.
(NSW Department of Planning 2005)

The Draft Metropolitan Strategy for Sydney includes a revised set of criteria for centres which simplifies the previous more extensive hierarchy (NSW Government 2013a). A Town Centre now comprises a much larger compliment of commercial premises and services including supermarkets, a variety of specialist shops, restaurants, schools, community facilities such as a local library and medical services. It also includes medium and high density housing with a capacity of some 9,500 dwellings within its defined catchment and is served by heavy rail and/or strategic bus and local bus networks. Ideal elements include a town square, a main street, sport facilities and reasonable access to parkland.

The Wrights Road Centre is a long way from complying with this definition of a Town Centre and more appropriately might be considered to be a Village Centre, one stage lower down the hierarchy. The site is however suitably located to act as a centre serving the surrounding rapidly growing area where the demographic would appear to be highly beneficial for commercial activities.

A Town Centre is defined as the largest and most significant of the three contained under the heading of Local Centres in the hierarchy; the others are Village Centre and Neighbourhood Centre. None of the descriptions applying to these centres adequately covers the location and content of the Wrights Road centre as developed to date and expected on completion. In this respect it doesn't fit into any relevant type of centre set out in the hierarchy for reasons which are related to its floor space content and lack of variety of provision.

Wright's Road centre is intended to serve the weekly shopping and service needs of the Kellyville Rouse Hill Release Area (Baulkham Hills Shire Council 2008). Other facilities in the vicinity, but not visually attached to the commercial area or easily accessed on foot (due to the intervention of busy roads) are a sports centre with a community centre included and two sports fields with dedicated car parking and a number of schools, both private and public. These cannot be realistically considered to be integrated with the centre itself although they are within walking distance.

Prior to considering the issues to be dealt with during the delayed completion of the development, two further retail studies were commissioned by council, one dealing specifically with the Wrights Road centre (Hill PDA 2009). This concluded that although the centre appeared to be trading well, it was considered to be unusual as the existing supermarkets were capturing a larger than normal share of total food and grocery expenditure due to a lack of local (on site) specialist competition; a shortage estimated to be of some 6,000 square metres. The report recommended that in order to protect the economic viability of the centre in the light of the expanding scale and strength of retail in surrounding

centres, consideration should be given to the provision of a discount department store and an additional ten speciality shops. This report was only concerned with the retail issues relating to the centre, not the centre as a whole.

Confusion relating to the kind of centre appropriate for the location and particularly its content as specified in the retail hierarchy can create problems in defining the kind of development ultimately approved. Ultimately this appears to have been determined by what the retail market is willing to provide in its standard format.

Content of the Centre

The necessary content for a development considered to be appropriate for a Village Centre in the established hierarchy rather than a Town Centre as defined in the *Draft Local Development Strategy* (Baulkham Hills Shire Council 2008) includes a similar range of facilities on a somewhat reduced scale and a smaller service catchment with access to transport expected to rely on strategic bus networks as a minimum rather than a heavy rail connection. There remains some confusion here as the Wrights Road Centre is still classified as a Town Centre by Council with its related zone objectives while the most recent definition of criteria for centre types does not list those centres to which these definitions refer (NSW Government 2013a). However, given the characteristics of the site and its location, those applying to a Village Centre are the most appropriate. Such a centre is described as a group of commercial premises (being retail premises, office premises and business premises) for daily shopping and services with a mix of uses and good links with the surrounding neighbourhood (NSW Government 2013a).

The early DCP for the President Road Neighbourhood includes a section on the provision of community facilities for the whole area, the majority of which would have been located at the centre (Baulkham Hills Shire Council 1994a). Community facilities would have included a long day care centre, youth centre and possibly a community health centre; a branch library was also under consideration. Although, the framework for the proposed centre shown in Figure Two suggests that a substantial part of development would provide space for community facilities combined with retail provision providing the basis for a public square, the discussion on any commitment to provision by council and other responsible authorities is absent. Other statements in this DCP are equally ambitious given the lack of legal weight available to such requirements and controls.

The District Centre [Wrights Road] may be developed in different ownerships, but development is required to take place in the context of one overall development plan (p 48).

Design elements affecting the layout of the Centre, such as the distribution of land uses, the location of car parking and community facilities and the design of pedestrian and service access are being developed by Council in consultation with the Centre developer (Baulkham Hills Shire Council 1994a, 49)

These statements indicate that at this stage, the development of the centre was expected to be undertaken as a single coordinated project and that consultations with a potential developer were then underway.

The initial stages of the development completed in 2003, do not include any of the community facilities originally considered with the minor exception of a medical practice which leases one of the limited number of shop units. None of the facilities which were the responsibility of Council to provide, fund and manage have been provided on the site and the range of commercial developments is limited to two competing supermarkets and a small range of specialist shops and takeaways. The community facilities included in the sports centre on the opposite side of Wrights Road, essentially a separate Council development are available for hire for various purposes by the community. No community facilities, with the exception of a small outdoor playground are proposed in the forthcoming completion of the Centre.

The use of advisory development controls with no effective legal weight and the inclusion of development concepts in DCPs which are equally lacking in authority illustrate the weakness of the powers available to councils to indicate a preferred response to an identified opportunity and to manage the subsequent development when it departs from the original intention. None of this is conducive to the certainty that the stated intention would be achieved in practice.

Compliance with Development Control Plan Controls

Development of the site for retail purposes was permissible under the applicable Local Environmental Plan (Baulkham Hills Shire Council 1991) and was also subject to the provisions of Development Control Plan Number 6 – Wrights Road District Centre during assessment and approval of the initial stages of the development. Relevant controls were also included in the DCP of 2009 and remain in the current DCP as the site is currently subject to an application which would complete the development of the centre (The Hills Shire Council 2011). The application for the second of the two existing developments on site was considered at a Council meeting on 22 October 2002 where approval was recommended subject to conditions (Baulkham Hills Shire Council 2002). The current development is shown in Figure 3.

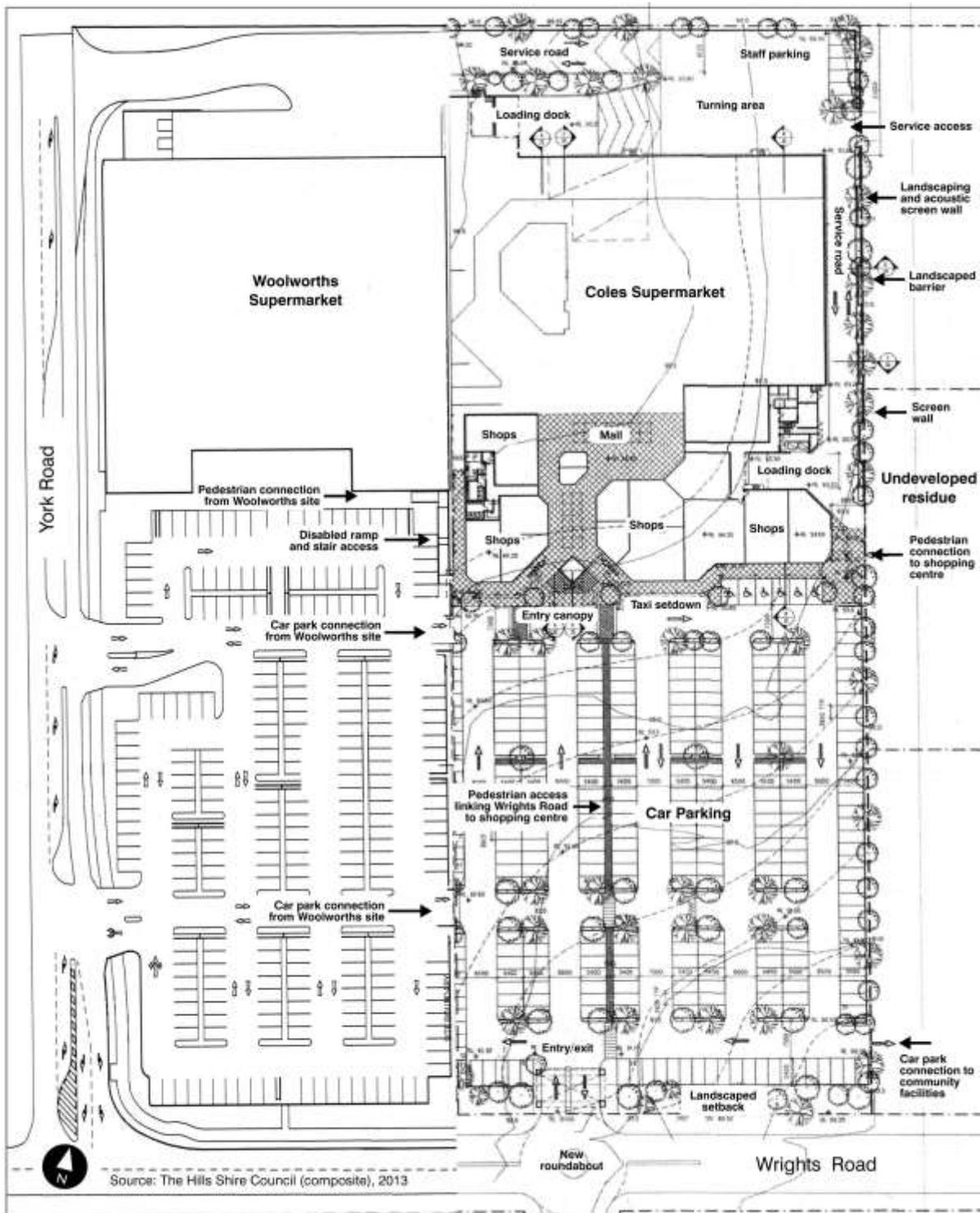


Figure 3 Existing development

The Objectives applicable to the development required the provision of high levels of civic amenity and a centre that makes a positive contribution to the local area, to create a sense of place and identity through quality built form that takes advantage of the proximity of, and integrates with, adjoining retail development, community facilities, open space, vegetation, pedestrian and cycleway linkages.

Specific controls required *inter alia* that:

- the development should capitalise on views to the open space and vegetation located along the eastern boundary;
- a central space should be incorporated into the design to encourage social interaction and form a link between and through, the development;
- the bulk of parking should be provided in a basement car park; some at-grade parking that provides convenient access for patrons and does not detract from the streetscape is acceptable; and
- the development shall demonstrate high quality civic amenity and urban design that will promote a vibrant centre with a sense of identity. This identity shall be enhanced through architectural elements, feature tree plantings and high quality landscaping (The Hills Shire Council 2011).

The assessment of the application focussed on a number of basic concerns, notably car parking provision (number of spaces provided), noise impacts and right of carriageway over the adjacent site developed by a commercial competitor in order to achieve truck delivery access to the rear of the development. There was no indication that the controls listed in the DCP and referred to as issues for consideration in the report to Council were considered at all; they are not mentioned in the document recommending approval. The drawings attached to the application which provided the basis for the approval indicated little response to the requirements of the controls and in one case at least, car parking, ignored them. All the parking approved is located on the surface.

The effectiveness of the planning process in achieving even its most fundamental outcomes appears to rely on the status of the planning controls included in DCPs. This has changed recently. The *Environmental Planning and Assessment Amendment Bill 2012* has introduced a seemingly contradictory note into the planning system. According to the Minister, the controls in DCPs have grown and become ever more complex and prescriptive making it more difficult for proposals to comply with them (NSW Hansard 24.10.2012). These changes have led to greater complexity, greater prescription and increased inflexibility, it is claimed. The bill was intended to ensure that consent authorities adopt a more flexible performance-based approach to the assessment of development. It makes it clear that DCPs are guidelines and have a lower status than Local Environmental Plans (LEPs) and State Environmental Planning Policies (SEPPs) in the assessment process and are necessary to implement planning instruments rather than the other way around.

The bill provides that where a development application does not comply with a standard, the consent authority must apply the DCP flexibly and allow alternative solutions to address those aspects of the proposal. The consent authority may consider the provisions of the DCP only in connection with the assessment of the particular application and is not to have regard to how the provisions in the DCP have been applied previously or might be applied in the future. These changes are not to be considered to be an opportunity for councils to delay the preparation of their standard instrument LEPs or to seek, at this stage, to include unnecessary development controls in those plans. This amendment has the effect of pre-empting the shift in emphasis set out in more detail in the Planning White Paper (NSW Government 2013b).

This, in effect, places more responsibility on councils where they are perhaps at their weakest in relation to development assessment. If a particular development such as the centre considered in this paper, requires the preparation of an overall concept which is considered to respond to the requirements of the location and its proposed contents comply with the appropriate level in the retail hierarchy, the only recourse available would appear to be to develop a detailed concept, the implementation of which would need to be negotiated with a suitable developer. If the concept does not comply with the developer's requirements, it seems unlikely that there will be any progress, even if the site is owned by council. While such circumstances vary, the implication is that councils have little influence over the practical outcome of their stated intentions.

Issues with Land Ownership and lack of Overall Control

In this case, the initial intention was clearly to create a coordinated centre based on a simple framework while recognising the multiple ownership of the site as indicated earlier (Baulkham Hills Shire Council 1994a). This would appear to be a highly ambitious aim as successful developments of this size normally start with the amalgamation of the separate lots required to accommodate it. This did not appear to be the intention although it seems to be assumed that a single developer would be required if these statements accurately reflect the situation at the time.

In the event, two applications, one from each of the main supermarket operators in Australia, were assessed and consent given on the same day in 2001. These were effectively two separate but similar developments. However, the problems with truck and surface parking access across the land of one of the applicants delayed construction of the other (Baulkham Hills Shire Council 2001) requiring consideration by the Land and Environment Court and the eventual granting of a right of carriageway. If there had been any intention to achieve the kind of site layout as indicated in the DCP at this stage, it was obviously too late while the separate applications were under consideration. There is no record that this was attempted during the period prior to the formal applications for consent and no mention of this possibility in the history of the application included in the Council documentation.

Any issue of coordination seems to have focussed on the more mundane issue of access for both trucks and cars across the land of one of the applicants which seems to have been overlooked when the applications were approved. Additionally, the failure to give any consideration to the relevant DCP's development objectives or controls even when the document was listed as a matter for consideration during assessment, remains questionable (The Hills Shire Council 2011). At the same time, the apparent lack of any interest in the practical achievement of an integrated centre is clearly shown following the sale of the final undeveloped parcel of land owned by council which was subsequently subdivided into two lots with the smaller block located along the Wrights Road frontage to be developed for a small supermarket approved in 2013. This will be totally isolated from the rest of the centre by a perimeter fence and separate access arrangements. Even though this land was owned by Council there appeared to be no attempt to influence, even at this late date, the form of the centre as a whole. The final development proposed is shown in Figure 4 on the following page.

Conclusions

The majority of the 1,000 or so small centres in Sydney (NSW Government 2010), often in the form of strip shopping precincts in suburban areas were initially unplanned, often growing incrementally by accretion, partial or even total redevelopment as they attempted to accommodate new shopping trends or increasing potential retail expenditure. Inevitably, they came under the egis of planning following the introduction of the 1979 Act. When the possibility arises to initiate a sizeable new centre within a prosperous and growing area on a vacant site, it presents a rare opportunity to achieve something which could support the notion that planning can deliver a better outcome than the private sector left to itself, could do.

An assessment of the Wrights Road development in 2007 indicated that there was an imbalance, with the supermarket supply exceeding demand by at least 1,000 square metres while supply of speciality provision was seriously lagging behind demand by some 6,400 square metres, reducing to about 4,000 square metres if supermarket over-provision was taken into account (Hill PDA 2007). This assessment does not take account of the subsequent approval for a third supermarket or the possible consent for the expansion of one of the existing developments on the site. The undersupply in 2007 was estimated at the equivalent of 35-40 shops excluding non-retail services such as banks, travel agents and estate agents.

The same report suggests that the centre has the least number of specialist shops and the lowest proportion of speciality stores to total retail floor space of all double supermarket based centres in Sydney at 18 percent compared to an average of 54 percent at comparable centres elsewhere. The final stage of development can be expected to make this comparison even more pronounced.

This outcome seems to suggest that there is an urgent need to review retail planning policies in NSW which to date have focussed on the limitations imposed by planning restrictions on new entrants to the market in the drive to introduce competition issues into these policies (Baker and Wood 2010). The example in this paper, which started with a number of advantages, has seen the retail component dominate a centre which should have been able to exhibit a range of other facilities as initially proposed, more appropriately contributing to the form and purpose of a community based space rather

than one totally committed to consumption. At the same time, the supermarket duopoly has been enabled to subject the local community to its version of what the retail market will provide, although their collocation may merely produce a minor decrease in average costs to the consumer (Australian Productivity Commission 2011).

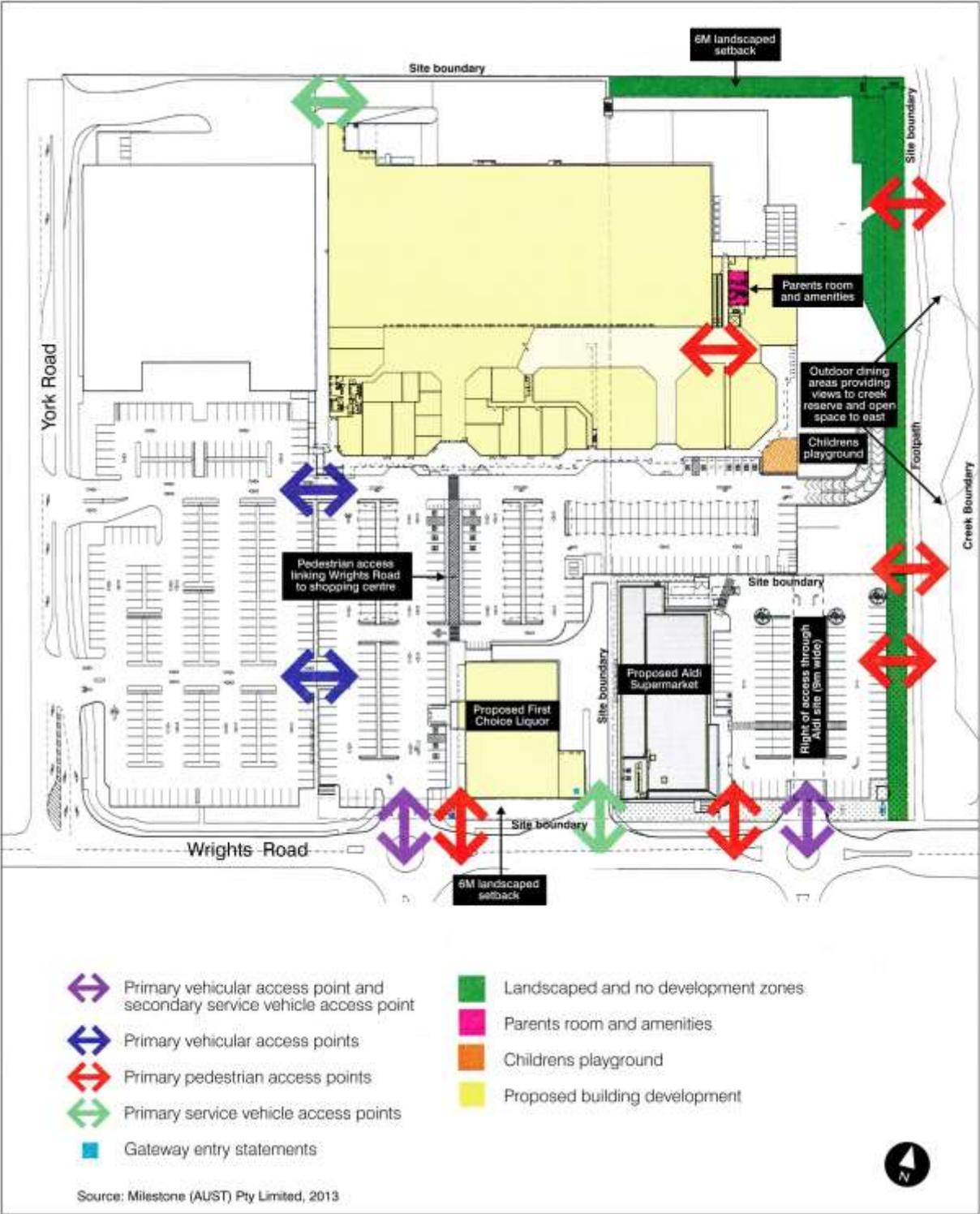


Figure 4 Full development

Overall, the issues raised here suggest that the role of councils in providing the local input and defining the necessary controls on physical development in their current LEPs and DCPs, intended to implement the policy requirements of the strategic plans is now so limited that they have become merely gatekeepers of the approval process. While they are responsible for the preparation of these documents which provide the legal basis for control of land use and development, their flexibility is now constrained by the rigid format of the LEP and the impotence of the detailed controls, that their ability to translate policy into development on the ground is heavily reliant on the acquiescence of the private sector. Under these circumstances it is difficult to characterise this stage of the planning process as providing the certainty claimed for it although the rhetoric of the recent Planning White Paper continues to suggest that this will be achieved by the operation of the new Planning Act.

The effectiveness of land use planning practice cannot be separated from the economic and political context within which the planning system operates. If planning is to achieve at least some of its social objectives which are now very broadly expressed in the draft Metropolitan Plan for Sydney (NSW Government 2013a) as key outcomes including (1) a liveable city and (2) a healthy and resilient environment, it would have to operate as a countervailing force to the market as there is no reason to suppose that the private sector, left to itself, would have any interest in achieving socially-orientated policy objectives. Those now included in the draft plan seem to have tacitly accepted that, as the state and the planning system are so bound up with and part of the context of neoliberal capitalism that any such changes could only occur as a consequence of the growth of the economy rather than an outcome of deliberate planning policy.

References

- Australian Government Productivity Commission (2011), *Performance Benchmarking of Australian Business Regulation: Planning, Zoning and Development Assessments*, Research Report, Two Volumes.
- Baker RGV, Wood S (2010), *Towards Robust Development of Retail Planning Policy: Maintaining the Viability and Vitality of Main Street Shopping Precincts*, Geographical Research 48 (1) pp 65-74.
- Baulkham Hills Shire Council (1991), *Baulkham Hills Local Environmental Plan 1991*.
- Baulkham Hills Shire Council (1993), *Kellyville Neighbourhood Development Control Plan*.
- Baulkham Hills Shire Council (1994a), *President Road Neighbourhood Development Control Plan*.
- Baulkham Hills Shire Council (1994b), *Victoria Road Neighbourhood Development Control Plan*.
- Baulkham Hills Shire Council (2001), *Determination of Development Application 1744/2001/HB, Lot 7 DP28985, Wrights Road, Kellyville*.
- Baulkham Hills Shire Council (2002), *Proposed Coles Supermarket, Liquorland Store and Speciality Retail Shopping, Lot 7, DP 28985, 50 Wrights Road, Kellyville (DA 451/03)*, Report of Council Officers.
- Baulkham Hills Shire Council (2008), *Adopted Draft Local Strategy*.
- Cullingworth JB, Nadin V (2006), *Town and Country Planning in the UK, 14th Edition*, Routledge.
- Hall P, Tewdwr-Jones M (2011), *Urban and Regional Planning, (Fifth edition)*, Routledge.
- Healey P, Cameron S, Davoudi S, Graham S, Madani-Pour A (eds) (1995), *Managing the City: The New Urban Context*, Wiley.
- Hill PDA (2007), *Wright's Road Retail Precinct Review of Floorspace Requirements*, Baulkham Hills Shire Council.
- Hill PDA (2009), *Baulkham Hills Retail Floorspace and Demand Analysis 2008, Addendum*, Baulkham Hills Shire Council.
- HM Treasury (2006), *Barker Review of Land Use Planning – Recommendations*, HM Treasury.
- Leyshon Consulting (1997), *Retail and Commercial Centres Study*, Baulkham Hills Shire Council.

Milestone (AUST) Pty Limited (2013), *Statement of Environmental Effects, 90 and 92 Wrights Road, Kellyville*.

NSW Department of Planning (2005), *City of Cities: A Plan for Sydney's Future*.

NSW Government (2010), *Metropolitan Plan for Sydney 2036*.

NSW Government (2013a), *Draft Metropolitan Strategy for Sydney to 2031*.

NSW Government (2013b), *A New Planning System for NSW: White Paper*.

NSW Hansard (2012), *Environmental Planning and Assessment Bill 2012, Second Reading, 24 October 2012*.

Pickvance C (1977), *Physical Planning and Market Forces in Urban Development* in Paris C (ed) (1982), *Critical Readings in Planning Theory*, Cambridge University Press.

Reade EJ, (1987) *British Town and Country Planning*, Open University Press.

Taylor N (2005), *Urban Planning Theory since 1945*, Sage.

The Hills Shire Council (2011), *The Hills Development Control Plan, Part B, Section 6, Business*.

The Hills Shire Council (2013), *DA 709 2013, Architectural Plans*.