



Submission on the *Draft Metropolitan Strategy for Sydney to 2031*

28 June 2013

Southern Sydney Regional Organisation of Councils

Ashfield Bankstown Botany Bay Burwood Canada Bay Canterbury
City of Sydney Hurstville Kogarah Leichhardt Marrickville Randwick
Rockdale Sutherland Waverley Woollahra

1 Key Issues

SSROC is generally supportive of the draft Metropolitan Strategy for Sydney to 2031 and the focus on consolidation and improved connectivity across Greater Metropolitan Sydney.

1.1 Community Involvement

SSROC welcomes the intent for participation by the community in strategic plans, and it has become apparent in the Planning White Paper that the Metropolitan Strategy for Sydney to 2031 is to become the Regional Growth Plan for Sydney.

SSROC is very strongly of the view that in this context, the consultation process for the draft Metropolitan Strategy was extremely inadequate. Regional Growth Plans are a critical component of the new system, and it is fundamental to those plans that the community is “involved in the setting of priorities and target for growth in the region, including planning for major infrastructure” (p50, figure 6).

Yet the significance of the plan in terms of its part in the proposed hierarchy of plans was unknown at the exhibition stage prior to the release of the White Paper, and the draft Metropolitan Strategy has not been revised to explain it. The process was not publicised in any way, and no effort was made to reach out to the community to seek its input.

According to the White Paper “these [Regional Growth] plans will be the subject of significant community participation”, but SSROC does not believe this to have been the case in relation to the draft Metropolitan Strategy for Sydney to 2031. Furthermore, the requirement for community participation is not reflected in the Planning Bill 2013.

If the consultation process for the draft Metropolitan Strategy is an example of how community participation is to take place, then it is extremely unlikely to be achieved, and the Government has undermined its own process in relation to this vitally important region of NSW.

1.2 Defining “Growth”

We understand the imperative of maintaining Sydney as a global city and needing to accommodate more people, more jobs and greater trade demand. However we are concerned that there is no real articulation of what our concept of ‘growth’ is based on and lack of any evidence-based understanding of responsible growth – that is, knowing how much growth, and at what pace, is sustainable for Sydney as a whole as well as regionally and locally. This requires us to have a better understanding of the limits of our finite resources and be able to equitably and efficiently allocate those resources across the population as it grows, doing more with less. These considerations should be covered in the Metropolitan Strategy, but are not.

The development of a better evidence-base for policy making is also necessary for improved integration between infrastructure planning and land use planning, a basis tenet of the White Paper and draft Metropolitan Strategy. The draft Metropolitan Strategy provides almost exclusively for infrastructure development but is unclear about the many variables that influence the policy targets, such as background technical data about population forecasts and housing and employment targets which are fundamentally important to effective strategic planning.

In April 2013 SSROC wrote to the Minister for Planning and infrastructure requesting that the Department of Planning and Infrastructure release technical background data on the rationale for the

jobs targets¹ but this has not happened. While the draft Metropolitan Strategy states at page 100 that an updated evidence base will be developed and published at some stage in the future, SSROC contends that this should have been made available during the exhibition period so that the reasoning behind growth targets was made clear and transparent.

SSROC recommends that the Metropolitan Strategy be redrafted to incorporate the evidence-based technical data that would be appropriate for a Regional Growth Plan for Sydney to 2031, and then be re-exhibited with an appropriate level of public exposure and consultation before it is used to set the direction for lower order plans in the new planning system.

1.3 Role of Local Government

Another key concern is in relation to the implementation of the Strategy in the context of the new planning system. There is little detail on the tools to deliver the strategy and specifically the role of local government. While the draft Metropolitan Strategy states on page 6 that the Strategy “lays a strong and ambitious strategic planning foundation for all 41 Councils in the metropolitan region” there is actually little direction for local government. Many of the issues canvassed are essentially out of the control of local government, yet it is Councils that bear the brunt of community dissatisfaction with urban planning.

We understand that local government will be involved in the Subregional Planning Boards and development of subregional delivery and local plans, yet Councils appear to have minimal influence over either, since they can be overruled if they deviate from the State’s priorities. As the Regional Growth Plan for Sydney, the Metropolitan Strategy needs to more clearly articulate the role of all stakeholders in delivering and monitoring the stated objectives. The absence of such information and the limited time available to assess the draft Metropolitan Strategy in the context of the Planning White Paper significantly limits the capacity of SSROC member Councils to provide sound advice and undermines the NSW Government’s consultation process on the draft Metropolitan Strategy.

1.4 Sydney’s Subregions

Ten of SSROC’s member Councils would be part of the Central Subregion, five in the South Subregion and one in the South West Subregion (page 81). Given the significance of the subregions as the focus of the Subregional Development Plans, we question these groupings.

The Councils to the north and south of the harbour have different interests in development, and it is inappropriate to group them together for the formulation of plans. Also, with seventeen Councils in the Central region it is difficult to envisage this as a reasonable sized working group. There is no explanation or justification for the groupings in the draft strategy, and no obvious synergies can be identified. SSROC recommends that these groupings need to be re-examined, a clear rationale for groups identified, and a logical explanation provided.

¹ DP&I, 2013, Productive and Prosperous Technical Background Document referenced at page 20 of the draft Metropolitan Strategy

Specific Comments on the Content of the Draft Metropolitan Strategy

2 Balanced Growth

There is a fundamental conflict between the commitment to sustainable development that is claimed in the draft Metropolitan Strategy, the growth that is actually proposed, and the overall process for decision-making in the new planning system as articulated in the White Paper. There are many references to sustainability throughout the draft Metropolitan Strategy. But these words are not backed up by any commitment in the White Paper, which would be demonstrated by giving equal weight to social, environmental and economic considerations, as well as to equity and community participation. Essentially, development without community participation is not sustainable, and neither is development where the financial viability of a project overrides other considerations.

It is disappointing that in 2013 population growth, productivity improvements and economic growth are still considered before, and in isolation from, the social and environmental contexts that prerequisites for them. Climate change, air quality, biodiversity, affordable housing and social connection are all important and a necessary for – not results of – economic growth. The strategy is skewed too much towards economic growth and development at all costs.

2.1 Greenfield Development

SSROC is concerned that greenfield development will be open to market demand under a supporting Land Release Policy. Demand for greenfield development primarily comes from developers for whom it is easier than pursuing infill development in densely built urban areas. As stated on page 12 of the strategy, despite generous rezoning of land in greenfield areas, the actual delivery of new homes is low, perhaps because people do not want to be disconnected from essential infrastructure and services.

Every effort needs to be made to supply more affordable and diverse housing stock so that people can acquire 'value for money' housing in existing urban areas, and to place further downward pressure on greenfield release demand.

2.2 Undeveloped land in the Urban Metropolitan Area (UMA)

It is imperative that we use the existing UMA to support growth before sprawling Sydney further into metropolitan rural areas, but clarification is required about what it means to develop "undeveloped land yet to reach its full potential" and what is required in order to "unblock processes to activate this land." (page 12).

It is unclear which specific areas within the UMA are included in the 30,000 ha of undeveloped land, but it is apparent that this would require the development of existing open space.

SSROC would want a specific development plan or perhaps zoning to apply to these areas to ensure that development works with – not against – the natural environment, including the preservation of parklands and wetlands to support biodiversity and recreational uses and the management of climate change and sea level rise risks in addition to the adequate provision of transport infrastructure and essential services to support new housing development and population growth in these areas.

2.3 Strengthen and Grow Sydney's Centres

SSROC supports the objective to strengthen and grow Sydney's Centres and supports mixed use development where there is demonstrated demand and complementary land uses. SSROC cautions, however, that residential amenity must be an important consideration when planning mixed use developments.

Mixed-use developments incorporating supermarkets below residential dwellings are a case in point. With rapidly expanding distribution demand and a freight industry moving toward 24/7 operations, regular heavy vehicle movements in residential settings can have serious implications for local economic and community health outcomes through impacts including noise and vibration, pollution, accidents and road asset degradation.

SSROC considers that it is essential that Councils are able to provide input into both the implementation of the NSW Freight and Ports Strategy and the new planning system to ensure that these impacts are addressed, monitored and mitigated to the best of our combined abilities.

2.4 Make Sydney Connected

SSROC supports the objective to improve connectivity across Sydney, with a focus on improved transport services through cross-city connections to strategic centres and specialized precincts.

A recurrent theme that has emerged from consultations with our sixteen member Councils is that the focus should be on the experiences and demands of end-users as well as on the configuration of the network itself. In short, the focus should be on both connectivity and accessibility.

2.5 Corridor planning that incorporates freight

In our response to the Draft NSW Ports and Freight Strategy earlier this year, SSROC supported freight corridor planning, including the preservation and appropriate utilisation of strategic road and rail freight corridors across Sydney, but we were unclear as to where the proposed corridors are, and what the Government might do with them. Unfortunately, the Draft Metropolitan Strategy offers no greater insight, particularly for the southern Sydney area, which expects a dramatic increase in road freight resulting from expansion works and the lifting of the cap at Port Botany.

SSROC asks the NSW Government to collaborate with local government to develop regional (including urban areas) freight plans that clearly identify the geography of the corridors, and that articulate the opportunities and threats as well as how they will be addressed in the context of the environment and social amenity. We specifically seek more information relating to the action on page 77 to investigate the potential role, alignment and opportunities for Port Botany links.

2.6 Sydney's Metropolitan Rural Area

SSROC cautiously supports the Government's strategic approach to the few remaining metropolitan rural areas of Sydney, particularly those initiatives that seek to support agricultural output, promote tourism and nurture the sustainable growth of the towns and villages within these areas. We are primarily concerned with the loss of food-producing agricultural lands in the Sydney Basin and the balancing of mineral resources development with the protection of other land uses. Agricultural production in Sydney represents approximately 12% of NSW agricultural and employs about 11% of the NSW workforce.

Sydney is a major production centre for leafy green vegetables, capsicums, chilli, celery, mushrooms and

herbs such as basil and coriander, as well as poultry². Sydney needs to preserve and even to increase food production for many reasons, including employment, climate change, peak oil and food security.

Everyone needs access to fresh food. But if food must be transported from further afield then the cost of transport will increase, additional greenhouse gases will be generated by the transport, the food may be less fresh on delivery, and will be more expensive. As fuel prices increase as a result of peak oil or oil security issues, then the food will become still more expensive. If the food must come from overseas, then the risk of introduction of destructive pests and diseases increases. Clearly locally grown food is very important, and should be encouraged in the Sydney Basin. Land that is suitable for agricultural production should be preserved for that purpose.

Appropriate zoning would help to ensure that such land is not developed for other uses, but is not sufficient on its own. The concept of the “agricultural precinct” identified by the Department of Primary Industries appears to be entirely appropriate to the Sydney Basin. The State Government could encourage food production in the area by facilitating this type of development: agriculture requires infrastructure such as roads, access to markets and packing facilities, the assurance that the zoning is permanent, and appropriately trained people.

Many landowners hold onto their land waiting to sell it for development. The concept of Transferable Development Credits, (conceptually similar to bio-banking) whereby farmers are paid for the change in value to their land when it is re-zoned, should also be explored.

We request that the NSW Government ensure that local Councils and Shires are full participants in any strategic review process in relation to land management and included in decision-making about the future of these lands.

3 A Liveable City

3.1 Appropriate Housing Mix and Suburban Character

SSROC supports initiatives to encourage the supply of mixed housing types close to existing and planned infrastructure, particularly in infill areas.

Affordable housing supply is a key issue for the SSROC region, with the NSW Centre for Affordable Housing reporting that our sixteen member Councils are at either high demand or moderate high demand for affordable housing supply. We support changes to the NSW planning system that would enable Councils to influence local affordable housing provision via mechanisms that enable them to derive a proportion of value uplift from new developments so that key workers could live and work locally. This would have significant economic benefits through enhanced productivity and the reduction of business-related expenses associated with labour hire.

The right housing mix is also essential because it contributes to, or detracts from, the established character of Sydney’s suburbs. In many cases new higher-density housing has been established which looks glaringly out of place because the design is inappropriate to the streetscape.

SSROC believes that the draft Metropolitan Strategy could go further to preserve local character, such as existing pockets of Sydney that have 19th century characteristics, or have retained a low-density or

² Elton Consulting report to the NSW Department of Primary Industries, *Sydney's Agriculture - Planning for the Future Forum Outcomes Report*, 7 February 2009 available: www.dpi.nsw.gov.au.

garden suburb appeal. The strategy should aim to capitalise on that diversity, rather than treating Sydney as a homogenous canvas open to continuous development.

3.2 Urban Design Quality

SSROC is concerned at the watering down of local and state government controls relating to urban design quality. The planning system proposes 80 per cent code-compliant development, which largely removes local government from assessment processes that would include qualitative review of design and encourage continuous improvement in design outcomes.

SSROC questions whether there is any incentive for developers to deliver quality sustainable design, particularly at the lower end of the affordability scale, no matter how good the guidance on best practice available to them. Furthermore, developers have no reason to look beyond the limits of their own development site, and accommodate other considerations such as streetscape, landscape, overshadowing or neighbourhood.

There is also the broader issue of design quality around town centres, and the implications for amenity, accessibility, inclusiveness, cohesion and the overall health and well being of communities and the environment. The strategy assumes that people will move to the centres, following the urban renewal trend. However, it follows that the centres must also provide the amenity for those people: many centres are relatively empty outside working hours.

Sydney has significant imbalances in relation to the socio-cultural and employment opportunities available to local communities. It is hoped that urban renewal and the city shapers' initiatives will help to provide a more equitable balance of opportunities across the city. This cannot be left to chance, however, and is another reason why design quality must be well integrated into the new planning system.

SSROC is pleased that the draft Metropolitan Strategy recognises the role of local government and not-for-profit organisations in working with the community to foster cultural activity, private investment and good environmental outcomes but the planning system must support these organisations to achieve good urban design outcomes.

4 Deliver accessible and adaptable recreation and open space

SSROC agrees that "Sydney's open space needs to be planned as a connected, integrated system" (page 36), incorporating regional corridors for active travel and the delivery of attractive and accessible experiences, uses and destinations along those routes. Many great global cities have parklands in highly developed urban areas, as well as local parks and reserves in suburbs: these features are important for residential and worker amenity and add greatly to the appeal of centres and suburbs.

SSROC supports the preservation of green corridors for environmental reasons as well. These spaces are important for biodiversity and can also support community gardens.

5 Productivity and Prosperity

SSROC generally agrees with the objectives listed under Productivity and Prosperity but we are concerned about the focus of the strategy on jobs targets. Firstly, as we have previously commented, the figures at page 44 are delivered arbitrarily and without sufficient evidence to assist Councils identify the possible impacts of any changes in those expectations.

Secondly, while Councils are responsible for creating capacity through the appropriate zoning of lands, creating capacity for employment through the supply of office and retail space is only a part of the solution, and will not of itself deliver a thriving local economy.

The NSW Government will need to develop additional strategies for creating employment opportunities including adequate, reliable transportation and local affordable housing will also be necessary to attract key workers to new jobs, particularly where employment clusters of high potential industries are formed.

5.1 Rail freight reform

SSROC agrees that one of the major challenges for NSW is to improve the flow of resources across the State and beyond. SSROC supports rail access reform as it will become increasingly important to supply chain efficiency, productivity and overall economic growth.

Although attempts have been made to increase the modal share of freight rail, these have had little impact to date, particularly in relation to the movement of freight to and from Port Botany. More needs to be done to redress the inherent time and cost inefficiencies of rail and develop key intermodal infrastructure within well-located and fit-to-purpose industrial lands.

5.2 A Second Sydney Airport

While the draft Metropolitan Strategy notes that the NSW Government will work with the Australian Government to bring forward infrastructure projects of joint national and State significance (at 16.3), and acknowledges that Sydney (Kingsford Smith) Airport is reaching capacity, there is no specific reference to the need to plan for passenger and air freight overflow.

SSROC supports the development of a second major airport for Sydney, and is aware of a growing base of support for the development to be at Badgerys Creek. The development of a second major Airport (or the utilisation of existing smaller airports and RAAF bases as an interim measure) should be considered in the context of managing growing air freight demand with a view to relieving passenger capacity constraints and improving traffic flow at Sydney Airport. This is a critical issue and should be canvassed in the draft Metropolitan Strategy.

6 Balance the development of mineral resources and construction materials with the protection of other land uses

SSROC agrees with the need to protect food production within the Sydney Basin and contends that the development of mineral resources and construction materials should not take precedence over food production, water resource management and other agricultural activity within the Basin.

The development of an Aquifer Interference Policy and incorporation of consideration for groundwater management is essential. Oversight by the NSW Office of Water and the establishment of a Land and Water Commissioner to oversee exploration approvals are also key.

More broadly, we agree that more evidence-based data needs to be acquired in relation to the cumulative health, amenity and environmental impacts of mining and resource (including water) extraction to better inform decision-making processes.

7 Healthy and Resilient Environment

SSROC agrees with the general principle and delivery actions across these objective areas and supports the development of management plans for waste, water and energy use in greenfield and precinct-scale infill development. SSROC has previously called for the development of a waste, water and energy commission that would have a significant role in the oversight of this task.

Sydney needs to continue its efforts to address climate change to mitigate adverse impacts. More needs to be done to support renewable energy research and development. Sydney has huge potential for renewable energy, particularly from solar, wind and potentially wave energy. Some SSROC member Councils have taken the initiative and started to develop a Renewable Energy Master plan, *Our Energy Future*, for a substantial area in southern Sydney. In addition, SSROC strongly supports *Towards a Resilient Sydney* and plans to participate in this project.

There have been multiple reports highlighting the employment opportunities that renewable energy, sustainable water systems and other “green” technologies offer³: and yet NSW has signally failed to nurture these emerging opportunities, including failing to create or update the planning frameworks within which the technologies can facilitate either our sustainability or our economic objectives.

Planning regulations also need to be brought into line with efforts to respond to climate change. For example, at present there is very little onus on owners and tenants in residential flat buildings to manage their own water usage. As an unprecedented number of such buildings are developed across Sydney, a significant improvement in relation to water conservation would be to enable individual metering within them.

Councils in southern Sydney have made significant improvements in their own greenhouse emissions, and are major influencers of community behaviours in this regard. Member Councils are keen to improve the effectiveness of their efforts and to this end are endeavouring to improve their understanding of local sources and the potential for change, potentially including land use considerations. This initiative depends upon building up sufficient reliable information to enable the effectiveness of their programs to be assessed; a system for compiling such information is required. Councils would benefit from State Government support for this initiative, both from funding for system development and from relevant expertise.

8 Accessibility and Connectivity

SSROC supports regional linkages and connectivity, and the creation of a well connected multi-modal transport system, providing real alternatives to private vehicles would improve every dimension of the city’s sustainability – financial, economic, social and environmental – over time.

8.1 Parking

The Metropolitan Strategy promotes transport choice but does not effectively articulate the impacts of traffic congestion or acknowledge the parking problem in high-density town centres.

Councils bear the brunt of community dissatisfaction with the limited availability of parking and parking restrictions and have requested that the State Government delivers a Metropolitan Parking Strategy to support the implementation of the Metropolitan Strategy.

³ See for example, ACF and ACTU, *Green Gold Rush*, October 2008.

8.2 Public Transport

SSROC supports the objectives and particularly the movement away from concentric transport planning that shifts all resources towards the CBD. More needs to be done to improve accessibility to Sydney Airport and other high-employment generating and service-oriented precincts. The Airport Link station access fee to the International and Domestic Terminals and the removal of half of all peak-time services to Kogarah station are in stark contrast to this policy and should be reviewed.

8.3 Active Transport

More needs to be done to promote active travel for short trips. The Active Transport Unit of Transport for NSW has identified that many more people would like to ride bikes for short distance travel to work and other destinations, but are held back by the perception that Sydney's roads are not accessible – that is that they are neither safe nor amenable – nor sufficiently connected for bike transport. Until this issue is addressed holistically, the NSW Government's modal share target for cycling, which is 16% of short trips by 2020, remains unachievable.

SSROC member Councils are committed to working together to share resources and connect active transport existing infrastructure across boundaries. The Inner Sydney Regional Bike Plan is a highly developed plan that is ready for implementation but as yet has not attracted funding. The NSW Government could do more to provide Councils with funding or to support applications for funding to other bodies, including Infrastructure Australia.

9 Conclusion

In conclusion, the draft strategy contains some positive elements and good intentions. However, its credibility is seriously damaged by the lack of consultation and community participation when examined in the context of the supposed input to Regional Growth Plans outlined in the Planning White Paper.

Its interpretation of sustainability is inadequate, and SSROC would remind the Minister of the following definition “development that meets the needs of the present without compromising the ability of future generations to meet their own needs⁴” and the two key concepts:

- the concept of 'needs', in particular the essential needs of the world's poor, to which overriding priority should be given; and
- the idea of limitations imposed by the state of technology and social organization on the environment's ability to meet present and future needs.

That definition is reflected in the goal of the National Strategy for Ecologically Sustainable Development, which was adopted by the Council of Australian Governments in 1992: *“Development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends.”*

SSROC urges the Minister to re-examine the draft strategy to adjust its current skew towards growth at all costs. SSROC also recommends that the revised draft should be re-exhibited in a manner that reflects the intent of the Planning White Paper for community participation in the development of Regional Growth Plans.

⁴ Our Common Future: Report of the World Commission on Environment and Development, “The Brundtland Report”, World Commission on Environment and Development (1987).