27 March 2008

Regional Director
Sydney South West Region
NSW Department of Planning
PO Box 404
Parramatta NSW 2124

E: southsubregion@planning.nsw.gov.au

Dear Sir,

Submission on Draft South Subregional Strategy

The Planning Institute of Australia (PIA) welcomes the opportunity to provide its comments to the Department of Planning, in relation to the Sub-Regional Strategy for the South subregion of Sydney.

The Planning Institute of Australia represents in the vicinity of 4,500 urban and regional planners and associated professionals working in Australia and internationally. Around half of our members work in local government, thirty percent in the private sector and the remainder in state/commonwealth government and academia. The NSW Division of PIA represents over 1300 members.

The attached submission is based upon input from the PIA NSW Division Policy Committee and individual planners working in Local Government and the private sector.

We look forward to discussions regarding our submission and how we might collaboratively progress the proposals outlined in the submission.

Yours Sincerely,

[Signature]

Julie Bindon
President
NSW Division
SUBMISSION ON THE DRAFT SOUTH SUB REGIONAL METROPOLITAN STRATEGY

March 2008

SUBMISSION BY

Planning Institute Australia, NSW Division
Level 7, 77 Berry Street
North Sydney NSW 2060

PURPOSE

This submission is made by the Planning Institute of Australia [PIA] NSW Division to the NSW Department of Planning in relation to the Draft South Sub Regional Strategy which includes the local government areas of Canterbury, Hurstville, Kogarah, Marrickville, Rockdale and Sutherland.

DESCRIPTION OF THE PLANNING INSTITUTE

The Planning Institute of Australia (PIA) is the peak body representing professions involved in planning Australian cities, towns and regions. PIA NSW plays key roles in promoting and supporting the planning profession within NSW and advocating on key planning and public policy issues.

PIA is a voluntary subscription based member organization with 4500 members. The New South Wales Division of PIA has 1300 members.

SUBMISSION

PIA sees the Metropolitan Strategy and now the Sub-Regional Strategies as a highly significant initial step that provided impetus to the achievement of adequate responses to urban growth. As such they should be considered more as enabling documents designed to guide current and future planning rather than mandatory instruments in the traditional statutory context.

The submission does not deal with the detailed provisions of the Sub Regional Strategy but addresses the broader issues for Sydney reflected in those strategies and the further steps required for satisfactory implementation of the overall strategic proposals.
1.0 METRO STRATEGY – GENERAL PRINCIPLES

PIA supports the general planning principles of controlling urban sprawl and that future population and job growth should be encouraged to locate close to transport nodes and corridors. However this also suggests that the twin ambitions of accommodating increased population growth, and providing access to more jobs locally, may well involve mutually incompatible activities.

The Planning Institute:

- is concerned that there has been no ‘ground truthing’ of the targets set by the regional strategies and that the State Government is already announcing initiatives that are contrary to some of the sub-regional strategies;
- suggests that the potential land and locations suitable for redevelopment at higher intensity be defined whether for housing or jobs to confirm the intentions of the strategic diagrams that constitute the core of the current stage of planning work;
- does not believe that the funding implications of ageing infrastructure have been adequately addressed; and
- strongly supports the inclusion of sustainability indicators and housing affordability targets in each of the sub-regional strategies as have been introduced in similar plans for major cities such as London and New York.

As well, PIA believes that the Metro-Strategy should also have articulated, as a matter of principle, that the metropolitan area should not become geographically divided on the basis of social status or income – the risk of which is already apparent in the 2006 Census results.
2.0 SUB-REGIONAL STRATEGIES – GENERAL IMPLEMENTATION ISSUES

In relation to the practical problems associated with attaining the levels of residential development that are implicit in the Sub-regional Strategic Plans, the PIA believes that considerable work needs to be undertaken to identify suitable land in suburban and transportation nodal areas for redevelopment.

Consistent with this work, it is acknowledged that local council planners will be required to achieve a mix of housing types and densities based on a sound analysis of housing capacity and housing needs. For this to happen, it is apparent that Councils will need to incorporate the aims and objectives of the Sub Regional Strategies in their own local planning strategies and LEPs and in particular will have to plan for:

- The adaptable housing needs of the ageing population;
- The impacts of redevelopment on affordable housing;
- Appropriate distribution of more affordable housing for both rent and purchase;
- The provision of social infrastructure in high density, accessible locations to meet the needs of diverse groups in expanding populations;
- The cost impacts on development feasibility of incorporating the necessary environmental sustainability components in new buildings; and
- The availability of social and hard infrastructure to meet the demands of expanding populations that will need equitable access to jobs and community facilities.

These factors will have major impacts on the capacity and feasibility of areas to achieve their targets as currently proposed and in addition, constitute far from trivial problems of planning administration, quite apart from the public dimension of issues that are likely to arise.

PIA is also concerned that the type of development that has come out of the application of the Residential Development Strategies and rate of growth of urban housing development cannot be sustained indefinitely at the same rate or quantity. In particular, increased land values have a particular impact on the availability of sites and this is largely due to the need for site consolidation. At present, there is a fundamental problem in obtaining unit owners support for the winding up of strata plans to allow site redevelopment. This constitutes a significant barrier to redevelopment that has not been addressed in the Sub-Regional Strategic Plans. PIA considers that legislation is urgently required to facilitate the redevelopment of strata buildings where less than 100% of the owners agree to a consolidation of titles, to allow a site to be sold and redeveloped.

Whilst intensification of nominated centres (Major, Specialised and Town Centres under the sub regional strategies) will be a major focus for much new housing, the high land values in these areas generally mean that mid to high rise apartments are likely to be the only financially feasible built form. These types of dwellings have an inevitably limited attraction to a relatively small segment of the total housing market. Moreover, as expressed in a number of Metro-forums prior to 1995, a strategy which relies heavily on
high rise residential development in a limited number of commercial business centres does not appear to be palatable to the general public. Conversely, the public preference appears to embrace townhouses, villas and less dense forms of multi-unit housing although PIA acknowledges that this form of development is unlikely to be economically feasible. Moreover, such low densities are unlikely to achieve the level of population growth foreshadowed in the Sub-regional Strategic growth targets.

In relation to issues of “sustainability” and “greenhouse gas emissions”, townhouses and villas involve a rational form of accommodation and as importantly, are attractive to a broader section of the housing market, are less expensive to build, have lower energy consumption and their lower scale can be more easily integrated into existing suburbs. The quality of villas and townhouses, however, has been variable, and high land values have historically been a significant impediment to developing lower density housing. Accordingly, finding land that is suitable to respond to the redevelopment targets in the sub-regional strategies can be expected to be extremely difficult and will need to be based on careful land assessment at the local level. For such an enterprise to have any hope of success, support by the State Government will have to go much further than setting out a strategic framework of action.

The challenge will be to ensure that housing redevelopment does not jeopardise the employment growth potential of the commercial centres and industrial areas. Further it is considered unlikely that demand for housing will simply abate at 2031 and accordingly, based on a longer term perspective, the PIA anticipates that capacity restraints to redevelopment for housing is effectively inevitable.

PIA is concerned that for the residential targets in particular to be achieved, there will need to be a major commitment to extensive land capability assessment that is only likely to occur with the assistance of the State Government, either through direct assistance with attached personnel or through financial aid for external consulting work. Such sub-regional land analysis will be required to determine the housing capacity of land around the commercial centres, mechanisms to ensure delivery of housing mix and employment in accessible and well resourced locations, infrastructure needs (including electricity supply and drainage that are now beyond capacity in most inner areas), public transport demands and active transport (cycling and pedestrian) networks directed at building viable communities rather than enclaves of new, socially and physically deprived housing.

This suggests that new governance arrangements will be required, based on the adopted sub-regions, and involve new and more complex relationships between Local Councils, the development sector, government agencies and social service groups coordinated by the Department of Planning.

3.0 DRAFT SOUTH SUB-REGIONAL STRATEGY – PARTICULAR STRATEGIC ISSUES

The Councils within the South Sub-Region are generally supportive of the key directions however some Councils have concerns over their ability to meet the housing and employment targets. For example in Marrickville, the categorisation of some industrial land which prohibits residential development will compromise the housing targets by almost 2000 dwellings. As indicated above, further work (‘ground truthing’) is required to
validate the housing and employment targets and the strategies should be adjusted accordingly.

It is acknowledged that the key challenges within the sub-region relate to infrastructure provision and to provide a better match between the workforce that lives in the area and the types of jobs available.

The main strategic issues of concern relate to:

- Inaccuracies and contradictions within the shopping centre hierarchy which should be resolved in consultation with individual Councils.
- The impact major infrastructure decisions which have yet to be resolved could have on the implementation of the strategies. These include the future of the F6 corridor, M4 East, expanded Port Botany/Enfield Intermodal Terminal and the uncertainty surrounding the Parramatta Road Corridor.
- The implications for development on mentioned but not yet released planning guidelines such as *Guidelines for Development Near Noise Sources* and *Metropolitan Parking Policy in Strategic Centres* which have the potential to negatively impact on housing and employment targets.
- Limited opportunity in the sub-region for new local open space provision, however there is little detail on the possibilities of improving the quality and access to existing open space and how that might be funded particularly in light of proposed s94 restrictions.
- Councils will need to be provided with the monitoring tools and associated training and resources to ensure progress on achieving targets and other indicators can be accurately tracked.
- The State Government needs to include more detail on specific actions it will undertake to support Strategic Centres.

### 4.0 CONCLUSION

PIA submits that a specific program of local plan development steps should now be undertaken in concert with the Local Authorities as a means to more specifically identify land development opportunities. On this basis, the Planning Institute of Australia, NSW Division proposes that the Department now support the development of:

- Detailed action plans including land capability assessment which deliver well resourced and socially integrated major urban development areas and infrastructure projects;
- Preparation of these plans in conjunction with the key stakeholders;
• Inclusion of sustainability considerations as part of due diligence processes to ensure that social, economic and environmental sustainability aims are addressed from the outset;

• Inclusion of housing affordability targets and strategies

• Assigned responsibilities for implementation and funding at both State and Local Government level;

• Revised Local Governance arrangements designed to enable implementation to occur and to ensure that appropriate oversight of progress is achieved.

We would welcome the opportunity to discuss any aspect of this submission with the Department.