Draft Metropolitan Strategy for Sydney to 2031

Submission by Planning Institute of Australia (NSW Division)

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The Planning Institute of Australia (PIA) is the peak body representing professionals involved in planning Australian cities, towns and regions. The Institute has around 4,500 members nationally and around 1,200 members in New South Wales. PIA NSW plays key roles in promoting and supporting the planning profession within NSW and advocating key planning and public policy issues. This submission has been prepared on behalf of PIA NSW by members of the Institute.
INTRODUCTION

The NSW Division of the Planning Institute of Australia (PIA NSW) recognises the Government’s draft Metropolitan Strategy for Sydney to 2031, as the first draft regional strategy to be produced under the framework outlined in A new planning system for NSW: White Paper.

For this reason, this document and the process of consultation and engagement which accompanies its finalisation must be robust, transparent and visionary.

The consultation process for the White Paper has shown how important it is to get the messages, including the language we use, right.

In our submission on the Discussion Paper\(^1\), we stated:

The Metropolitan Strategic Plans of the past have been couched in planning or development terminology that professionals in the industry are comfortable with but the documents can be confusing and detached from the lives of people who will be most directly affected by the Plan. Our communities may feel alienated and disenfranchised from the tools that comprise the NSW Planning System. The new Metropolitan Strategic Plan should be framed and presented in a way that is meaningful and legible to most people. Such an approach is consistent with the Institute’s advocacy for cultural change in the way planners and the Government engage with our communities.

The new Plan could contain a section at the front that says what sort of a metropolitan city we want then describe how that metropolitan city will be delivered to create liveable communities, business prosperity, housing choice, job opportunities and a sustained natural environment.

Imagine-

A metropolitan city where I will:

- Be able to buy a house;
- Be able to open a business;
- Be able to get around easily and safely;
- Be able to enjoy the harbour, rivers and bushland;
- Get a job that I want near to where I live;
- Live in an area with a nice community feeling where people talk and walk along the streets;
- Be proud to be part of a multicultural, global city with all that it has to offer; and
- Live close to schools, shops, medical facilities and parks.

It is important that the intent of the Metropolitan Strategy is understood by the community at large but underpinned by detailed technical evidence that is made available for review by the professional industry. The engagement strategy provides a significant opportunity to trial the Community Participation model proposed under the White Paper and thus addressing the underlying intentions of this draft strategy to establish the changed approach to align with the direction for upfront community engagement and evidence based planning in the White Paper (seeking to improve community connections to planning).

In summary, the Institute:

\(^1\) Planning Institute of Australia (NSW Division) Submission: Sydney over the next 20 Years – a discussion Paper (May 2012), p2
- Supports the intention to align the strategy with NSW 2021, the Long Term Transport Master Plan, and the State Infrastructure Strategy and the whole of Government approach by integrating the policies and initiatives of strategies of other State Government Departments.

- Supports the recommendations for the Strategic Planning Framework for taking the Metropolitan strategy forward as outlined in the current White Paper and draft Exposure Bill. The processes and outputs for finalisation of the Metropolitan Strategy should be consistent with the White Paper and draft Exposure Bill (subject to any modifications consequent upon their exhibition).

- We also acknowledge that the final document and subsequent updates will be informed by the higher level planning policies and underpinned by subregional and local planning documents, yet to be finalised, as well as evidence based studies yet to be made publicly available.

- Supports the inclusion on policy statements within the document. We ask whether these are reflected in, or are a reflection of, the high level planning policies to be developed under the new planning system.

- We note that the new Metropolitan Strategy will figure significantly in planning approvals during the transitional phase of the new planning legislation, through the issuing of strategic compatibility certificates for new developments.

- The Strategy along with the White Paper places an emphasis on evidence based planning. This should be supported by the release of background information, data and evidence that have been used to inform directions of the Strategy. The draft Strategy currently lacks this evidence, and does not allow the public and the profession to fully understand the rationale behind its key directives. It would also give the public and the planning profession the confidence that the State Government is planning properly for their future, and their children's future. While the publication, “Costs and Benefits of Alternative Growth Scenarios for Sydney” is now available on the Department’s website, this only relates to existing urban areas.

- Further clarification is requested on how the Department selected the preferred growth scenario for Sydney. Whilst the modelling for the various scenarios is provided, a strong justification should be outlined within the draft Metropolitan Strategy as to why the 'balanced growth' option is the optimal development outcome.

- It is suggested that the Urban Feasibility Model that has been developed as a tool for Councils and State Government to model housing scenarios should be broadened to model employment growth scenarios. It should be made publicly available and training sessions provided regarding its use and inputs for local government and the planning profession.
The draft Metropolitan Strategy opportunities and future development plans appear very much Sydney-Parramatta and Northern region-centric. Sydney’s middle ring, southern and south western regions appear to have very little identified opportunities, despite the urban renewal, density and redevelopment opportunities that exist in these areas, particularly the Canterbury Road and Hume Highway City to Liverpool corridors, which connect very established and underutilised centres and localities.

In order for centres to become more successful in attracting jobs and investment, there needs to be a greater focus on metropolitan wide connectivity and renewal. Connectivity remains Sydney CBD-centric, whilst renewal appears to be focused on Sydney’s east, north and Sydney-Parramatta corridor.

Sustainability is poorly addressed in the Strategy. The Strategy appears to be driven by economic sustainability, rather than taking a triple bottom line approach to sustainability (ie. environmental, economic and social).

‘Employment lands’ is heavily centred on industrial employment areas. Employment as a whole needs to encompass all major employment sectors within Sydney, and identify their locations, particularly retail and commercial precincts. Retail is one of the State’s largest employers, and provides localised employment opportunities. Accordingly, the identification of employment lands could be revisited, and perhaps identified as ‘employment clusters’. This should be supported by an objective for comprehensive modelling of employment floor space within Sydney, which can be achieved by strong local government reporting parameters that inform a Sydney-wide database.

The use of the term “Growth plan” immediately gives messages which are seen as negative. PIA agrees that growth is essential but the message is important in terms of community acceptance.

We commend the inclusion of action plans and delivery tools however the “devil is in the detail” of the as yet unseen subregional delivery plans, and other delivery mechanisms.

The issues of inter-departmental cooperation and budget alignment are critical to implementation and need to be fully addressed in the proposed delivery plans, the broader governance structures and Implementation strategies. We support the inclusion of key responsibilities for government agencies and levels of government however these need to be embedded in certainty and measured against delivery plans.
PRIMARY THEMES OF THE STRATEGY

BALANCED GROWTH

Urban renewal that draws on existing infrastructure should be encouraged over the development of greenfield areas. As a general planning principle, increasing density near employment areas and public transport nodes should be prioritized over greenfield areas in the north-west and south-west of Sydney where public transport is lacking; traffic is already at or near peak capacity and employment opportunities are comparatively limited.

In this capacity a greater use of the urban activation precincts to accelerate housing and employment would seem to be a desirable outcome. This is particularly so where such precincts align with public transport corridors and proximity to current employment areas. The rationale for the selection of the current and future precincts should be made clearer. This can avoid any misunderstanding of their selection that may be tainted with the stigma of the former Part 3A projects and also to demonstrate a rational and proper process that is sufficiently robust to defend itself against local shorter-term protectionist and anti-development lobbies.

The proposed precincts in suburbs close to existing employment centres are supported, such as the Mascot, Randwick and Anzac Parade South proposed precincts which have access to the university and medical precincts and to Sydney Airport. Transport connections and social infrastructure are critical to support these projects.

In addition to the current precincts in Northern Sydney (North Ryde and Epping), a greater focus particularly in terms of promoting professional employment precincts should be given an expanded priority and employment targets in the sub-regional plans. As noted in the draft strategy these centres would link to the local and regional catchments of the Northern Beaches, Central Coast and North-West suburbs.

A LIVEABLE CITY

The promotion of housing mix must consider location in addition to demographics and the market. There remain many established inner ring residential areas that are dominated by low density housing and for a range of environmental, social or heritage reasons are exempt or difficult to redevelop for a broader housing mix. If affordability and diversity of housing type is to be a core policy area, greater flexibility in lot size requirement and permissible development zonings are necessary.

Within greenfield areas, a diversity of housing mix should not be driven by affordability as the primary principle, rather good design and proximity to supporting services and facilities such as open space, schools and transport should aid the planning process and inform the market forces of development. This is particularly relevant if less car dependent development is an outcome to alleviate traffic congestion and create sustainable and liveable suburbs.
The high level planning principles as proposed in the draft legislation must include good design outcomes. This includes variety in types of housing and lot sizes which are responsive to market demand and consumer preferences.

Strengthening the principles of the current SEPP 65 is necessary, and we would suggest establishing a design advisory unit or similar, to give effect to this.

Recognition of cultural heritage is vitally important for a liveable city in creating and maintaining a “sense of place” for our communities and retaining continuity of the past, present and future. The Metropolitan Strategy should provide clear direction to ensure heritage items and conservation areas are retained and not incrementally impacted by inappropriate scale, form and location of development in conservation areas or in the vicinity of heritage items or the cumulative impacts of development.

Provision for adequate open space is a key requirement for a healthy and connected society. The increasing cost to provide formal open space, such as sports ovals, is beyond the means of most councils and proportional development levies. Accordingly, the State Government in partnership with local government and sport and recreational groups should develop a parallel and integrated open space plan for Sydney that can adequately accommodate growing needs and demands.

The Metropolitan strategy is a critical opportunity to integrate the principles of healthy planning and liveability into the planning framework. As health has been included as an objective in the Planning Bill, we need to strengthen references to health in the Metropolitan Strategy. This would have the positive effect of cascading down and impacting on other plans. Measures of liveability should include ageing in place and quality open space, especially in higher density areas. The State of Australian Cities Report 2012 defines this as:

“Liveable cities support the health, wellbeing and the quality of life of people who live and work in them. The way they are planned, designed, built and managed can enhance or detract from liveability. The physical characteristics that contribute to the liveability of cities include land use, built form, quality and conservation of public spaces and natural environments, efficiency of transport networks, accessibility to work, education, health and community services and social and recreational opportunities. Less tangible to city liveability are broader societal and cultural characteristics of places and communities within cities.”

Health, Recreation and Education precincts are the primary focal points of the majority of specialized centres. We need to ensure these centres have the capacity for growth and that they have space to grow to meet future demand. The proposed Specialised Centres, such as that at French’s Forest, should ensure that a medical cluster, public transport and other supporting infrastructure is planned, budgeted and in place.

While housing stress and affordability have been identified in the Strategy, there is a need to provide more direction on how it is being addressed, in the short term, and linked to current work such as that being undertaken by the Housing Affordability Taskforce. Dependent on the recommendations

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2 State of Australian Cities 2012, Chapter 5
of the Taskforce (as per the White Paper), the Metropolitan Strategy may also need to consider affordable housing targets for each Sub Region.

PRODUCTIVITY AND PROSPERITY

Employment opportunities are a strong theme in this section and remain vital for a connected city. Care needs to be taken to ensure there is a diversity of employment opportunities across Sydney and not overly focused in certain areas. This is particularly relevant to the promotion of social equality and long term integration of what previously may have been referred to as the white and blue collar divide and may now be recast as the degree versus non-degree qualified jobs. The focus of warehousing in western Sydney and medical research in northern Sydney is an example of this divide. While specialization and hubs of expertise are necessary there is scope to plan for a wider spread across the metropolitan area as part of a 30 - year strategy. Jobs targets must be aligned with employment opportunities; that is, actual real industry demand, rather than nominating numbers without economic analysis.

Recognizing future employment lands is critical. Accordingly the strategy needs to tie in with the Western Sydney Employment Lands Strategy and other regions to ensure that sufficient land is set aside for future uses. This is particularly relevant in the context of future transport plans for Sydney linking new light and heavy rail, major road upgrades and the possibility of the Badgerys Creek Airport (not withstanding it is not currently on the NSW Government’s political agenda yet many parcels of land in and around this area remain subject to development restrictions). As this draft Strategy is clearly positioned for 2031, it should be inclusive of all land reservations and future uses irrespective of current political agendas.

Although the draft Strategy states that half of all new jobs will be in Western Sydney, in the case of the South West the main employment generating opportunity relates to the Western Sydney Employment Lands. With the substantial growth planned for this area and the changing nature of residents’ skill sets, we caution that this would mean that most of the opportunity is placed in one location.

Based on our calculations, the draft Strategy creates a significant increase in both housing and job targets. Notwithstanding this, in some subregions such as the South West, the increase in jobs is outweighed by housing thereby creating a proportional decline in the number of jobs targeted per dwelling / person, exacerbating existing inequities.

HEALTHY AND RESILIENT ENVIRONMENT

BASIX has been a valuable instrument in improving water and energy efficiently over the past nine years. Given the growth in technology and building standards since its introduction, consideration should be given to raising the requirements beyond the 4 star rating system. This is particularly relevant to the construction of new buildings that will have a life cycle of 30 + years. This objective would be further enhanced by including new water/ energy /resources tools for development such as:

- Precinct planning tools
- Sustainability tools and
- Infrastructure sustainability tools.
A critical aspect to improve air quality is to reduce vehicle kilometres travelled. This is particularly relevant for the air sheds of north west and south west Sydney that are positioned as key areas for new populations and employment and also subject to significant congestion.

Offsetting poor air quality can be in part achieved by improving the type and form of landscaping in street verges and on private land. This would not only complement good design practices, as advocated by water sensitive urban design (WSUD) and energy efficiency, but also contribute to urban ecology (connecting remnant natural areas) and provide some suburban thermal cooling.

The importance of WSUD in providing healthy water environments is supported. Greater evidence is needed as to the most cost effective measures advocated by WSUD and how to make these core aspects of design from single allotments to catchment scale planning. The new riparian policy of the NSW Government in part seeks to diminish the value of category 1 streams and completely ignores the ecological and water quality benefits of smaller and other intermittent and ephemeral waterways. The retention and protection of these environments is critical to minimize the cumulative impact of development.

The mapping of high conservation lands should have informed the development of the draft Strategy and not be an adjunct process that needs to adapt to predetermined housing and employment targets. Mapping must recognize not only listed species and communities but the importance of all remnant bushland areas and waterways. It remains unclear how development will integrate with this mapping particularly in areas outside the Cumberland Plain recovery area.

Adapting to climate change and impact of floods and sea-level rise should give greater consideration to a process of planned retreat for those medium to high density and in high risk environments. Such planning programs also need to consider the replacement and or upgrade of critical public infrastructure such as roads and drainage and their adequacy to response to changing circumstances. Today’s issues for society and governments include the potential for terrorist attacks, dam failures, biohazards, etc. Land use decisions at a strategic level should assist government and society in responding to and managing these issues. This will make the Metropolitan Strategy current and relevant to the realities of our society.

Minimise impacts of climate change in local communities (Objective 20) would be strengthened by the release of the neighbourhood and building design guidelines which can be implemented in the proposed urban activation precincts, urban renewal areas and subregional delivery plans.

There is a need to review the current environmental standards associated with climate risk (e.g. 1:100 flood levels), in light of impacts of climate change. There is a need to reassess the climate vulnerability of existing communities within the metropolitan area, as large tracts of developed land are flood prone and at risk.

The value of the good quality agricultural land is identified, however the Strategy also identifies that these lands may be able to accommodate future expansion of the urban development area. There needs to be greater certainly around protection of prime agricultural lands.

ACCESSIBILITY AND CONNECTIVITY
Enabling and supporting transport outside the private car should be priority for State and local government. The proportional expenditure and planning on footpaths and cycle ways to reduce car-dependent travel for shorter trips remains under-represented in planning strategies and objectives outlined in the draft Strategy. While a number of the urban activation precincts position transport orientated design as a core planning principle this should also be incorporated in all local and regional planning.

The promotion of the global economic corridor to the north-west and Parramatta needs to be accompanied not only by the North-west rail link but also the Epping to Parramatta rail connection. The latter is a fundamental missing link that connects two urban activation precincts (North Ryde and Epping) while complementing the priority for the development of Parramatta as the premier regional city. From an infrastructure perspective it remains an unknown capital cost to complete this connection and how this weighs up against other regional projects and their benefits.

There is a need to provide greater detail as to the location of future transport and utility corridors and how these impede or support urban expansion in Sydney. Such corridors should be represented on maps. This should include a discussion and future timeframes for the upgrade, replacement or relocation of existing utility corridors such as the Upper Canal and various high voltage power lines.

The Strategy highlights the high-speed rail plan but its enormous capital costs will require support funding from Federal Government if it is to go ahead to acquire route corridors that need to be identified and protected for future development.

Objective 24 identifies the environmental and sustainability benefits of transport infrastructure if we increase opportunities for new housing and employment in areas close to existing or planned public transport. This objective should also recognise the importance of providing public transport early enough to influence travel mode behaviour patterns, that is, providing public transport infrastructure before or at the same time development occurs. Part of the criteria for identifying new greenfield areas (NSW Government’s new land release policy) should be the ability to provide public transport infrastructure before or at the same time development occurs.

Unless the Metropolitan Strategy makes “Active transport green travel plans” mandatory for major development applications (as is the case with City of Sydney) they will be difficult to achieve. For example, the Sydney DCP 2012 requires a Green Travel Plan to be submitted to City of Sydney as part of the approvals process for developments over specified threshold sizes.

The Strategy needs to indicate the location of a second Sydney Airport (or Secondary Airport for Sydney) as it will be a primary link for global and domestic accessibility. Designation and preservation of the preferred site will be an immediate foundation for planning surrounding land use and trunk heavy infrastructure corridors that cannot sensibly be planned independently of the airport site. The eventual consequent construction and operation of the airport is a separate initiative that will form the basis for new investment, jobs and housing as well as underpinning business, immigration and tourism.
The future development of corridor plans requires a dedicated body to co-ordinate progress that can resolve conflicts including local community concerns, planning blight and boarded up retail areas, higher densities, parking, access, site consolidation, funding and health impacts.

The Metropolitan Plan targets for housing growth for Western Sydney Growth Zones have not been met due to lack of shovel ready land parcels largely as a result of the lack of infrastructure. This has led to lack of confidence and fragmented investment in the growth zones. For the Metropolitan Strategy to achieve success there needs to be a greater commitment to providing State Government coordination advanced transport, utilities and community facilities provision.

The Metropolitan Strategy needs to ensure there is a balance between designated freight routes such as the WestConnex Motorway route and community needs and small businesses along the Parramatta Road otherwise further urban blight will continue. The Strategy needs to identify a timetable and obtain a commitment to funding to establish the proposed intermodal Freight Terminals.

**SUBREGIONS**

PIA notes that the identification of subregions and the subregional delivery plans reflects the proposals outlined in the current planning review documents and the notion of subregions based on groups of councils which have been based on an assessment of the population and economic catchments. The practicality of subregional planning using these groupings needs to be fully tested as they may in fact make practical collaboration and administration difficult. The proposed subregions should also be reviewed following the outcomes of the current Local Government Inquiry.

**DELIVERY PLAN FOR THE STRATEGY**

PIA looks forward to further detail on the next levels of planning documents which are intended to provide greater details round this critical element of the Metropolitan Strategy. The impact of major proposals such as WestConnex and the potential Second Sydney Airport could heavily influence the currency of the Strategy therefore the commitment to review and update are critical to the credibility of the process.

**APPENDIX B: SPECIALISED PRECINCTS CRITERIA**

A key concern relates to Specialised Precincts (formerly Specialised Centres) (both existing and potential), specifically why there is no mention of housing targets for these centres. In considering the criteria for Specialised Precincts in the draft Metropolitan Strategy, there is an emphasis of these centres being employment destinations and/or the location of essential services. There is however, little mention of how people will live around these centres and how people will be able to access these centres without the dependence of a car. There needs to be housing targets for Specialised Precincts, in particularly affordable housing targets as many of the uses in these Precincts such as hospitals and universities attract people on lower incomes who require affordable housing and do not have to travel a significant amount of time across Sydney for work each day.
IN CONCLUSION

The Institute acknowledges that while the new approach is to be commended in many aspects, the document will need to be tested against the objectives and the details of the yet to be finalised Planning Bill and the related hierarchy of documents. Critical to implementation will be the buy-in from other agencies and most importantly, engagement with communities.

The Planning Institute looks forward to ongoing engagement in both the Planning Review and in the next stage of the Metropolitan strategy for Sydney.

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