

**Council of Social Service of NSW
(NCOSS)
Response to the
Draft Metropolitan Strategy for
Sydney to 2031**



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**Council of Social Service of NSW (NCOSS)
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About NCOSS

The Council of Social Service of NSW (NCOSS) is a peak body for the not-for-profit community sector in New South Wales. NCOSS provides independent and informed policy advice, and plays a key coordination and leadership role for the sector. We work on behalf of disadvantaged people and communities towards achieving social justice in NSW.

Introduction

NCOSS welcomes this opportunity to comment on the Draft Metropolitan Strategy for Sydney to 2031.

In June 2012 we responded to the Discussion Paper that was the first stage of the current Review of the Metropolitan Strategy. We welcome the fact that the Department has released a full draft revised Strategy for further consultation. This is the first time that this procedure has been adopted, allowing stakeholder groups to comment on the details of proposed key outcomes, objectives, policies and actions.

We thank the Department for its assistance in holding a consultation workshop at NCOSS for representatives of our sector on 20 May 2013. At that workshop there was concern that equity issues were neglected in the Draft Strategy, compared to issues such as economic growth and productivity. NCOSS believes that equity issues are equally important to debates about just what sort of Sydney we want, and that this needs to be reflected in the finalised Strategy.

Our detailed comments are grouped in accordance with the five key outcomes outlined in the Draft Strategy. We have inserted our own sub-headings for ease of navigation. Where we make comment on specific action items, we follow the numbering system in the Draft Strategy.

Balanced growth

NCOSS notes that the Draft Strategy does not explicitly state what proportion of Sydney's expected population growth will occur as infill development in the existing urban area, compared to new greenfield fringe areas. All recent Metropolitan Strategies have included such a target.

The Department appears to be issuing mixed signals on this important issue. On the one hand the focus on centres, renewal corridors and Urban Activation Precincts implies that the vast majority of growth is to occur in the established urban area. On the other

hand the Government's 'Super Saturday' announcement¹, committed to immediate action to progress 7 outer suburban greenfield sites nominated by landowners, and to further consideration of a further 13 landowner nominated sites, with a total capacity for more than 75,000 new houses in total.

While NCOSS does not necessarily object to all these sites, we do strongly oppose action to release new large greenfield sites for residential development in South West and North West Sydney *if these sites are outside the designated boundaries of the Growth Centres*. On past experience, significant social, economic and environmental costs will arise from any decision to allow haphazard development on Sydney's South Western fringe.

Strengthen and grow Sydney's centres

NCOSS supports the emphasis on centres contained in the Draft Strategy, and supports a strong focus on the further development of the listed Strategic Centres and the Specialised Precincts, including the airport, port, business parks/office clusters and the listed health and education precinct. This essentially continues the approach of the 2005 and 2010 Strategies.

We are disappointed at the NSW Government's refusal to join the debate about a future second Sydney airport. While there are differing views about the best option to pursue, it is inescapable that a decision has to be made before too long and equally that whatever decision is taken will have a profound impact on the future shape of Sydney towards 2031.

In relation to the three designated Regional Cities of Parramatta, Liverpool and Penrith, we again note the absence of any clear agenda by the NSW Government to plan for the development of the higher order jobs and facilities that would enable Liverpool and Penrith to provide the 'full range of services and activities' required for them to fulfil their role 'as capitals of their subregions' (p.16).

The nine city shapers

NCOSS notes that nine corridors or zones have been designated as 'city shapers', which have been identified because of their size and scale and the opportunities they present for the change and investment that are critical for the growth of Sydney (p. 18). We remain opposed, however, to the use of the terminology 'Global Sydney' in respect of the CBD/North Sydney and the 'Global Economic Corridor', now extended to run from

¹ 'Sydney's Super Saturday: Improved housing affordability and boosting construction', media release by the Premier 16 March 2013. This announcement referred to these sites as part of the Government's Potential Home Sites Program. The Department previously referred to these as Landowner Nominated Sites, which was a more accurate description.

the airport/Port Botany to Norwest and Parramatta. This terminology explicitly divides Sydney into global and residual zones.

We support the designation of the North West Rail Corridor as one of the city shapers and made a brief submission on the recently exhibited draft Corridor Strategy. We are aware that work is under way on the two announced Urban Activation Precincts along the Anzac Parade corridor and that a draft plan has been released for comment on the further expansion of the Western Sydney Employment Area.

In relation to the Parramatta Road Corridor, we note that its possible future role as a focus for more intensive residential development has been canvassed over many years, with little real progress. We are alarmed at suggestions that a renewal plan for this corridor will emerge as a by-product of planning for a new toll road.

We welcome the designation of Sydney's Metropolitan Rural Area as a key city shaper, but note that the draft Strategy is silent as to whether the Government intends to develop a strategic future plan for this vital area. Such a strategic plan should be developed for community consultation before any consideration is given to 'possible future extension of the Metropolitan Urban Area' (p.27).

A liveable city

Affordable housing

NCOSS is frankly disappointed that the debate on the contribution that the planning system can make to help overcome Sydney's entrenched shortage of affordable rental housing remains stalled.

The Draft Strategy states that 'affordable housing for a mix of very low, low and moderate income earners will be provided across Sydney' (p. 32), and includes action items 'plan for the inclusion of affordable housing in Sydney' (action item 6.3 p.32) and 'prepare housing strategies to provide for future housing mix and identify local affordable housing opportunities' (action item 6.2 p.32). However, the Draft Strategy contains no specific affordable housing target or delivery mechanism, with the suggested delivery tools being the Subregional Delivery Plans and the Review of the Affordable Housing SEPP.

This is seriously insufficient as a response to one of the key concerns raised in submissions on last year's Discussion Paper. We would also note that there are productivity and efficiency arguments, not referred to in the Draft Strategy, for the Government to take explicit action to ensure that affordable housing is located close to large concentrations of hospitality, retail and healthcare jobs. This is particularly the

case given that Sydney does not have a public transport system that allows such workers to travel substantial distances to and from work 24 hours a day.

Given this, NCOSS essentially restates what we said in our response to the Discussion Paper. We recommend that:

- The Metropolitan Strategy and the subsequent Subregional Delivery Plans must include medium term affordable housing targets for Sydney as a whole and for individual sub-regions and local government areas,
- There should be a clear policy commitment that the redevelopment of large government owned sites must include an affordable housing component, and
- Areas benefiting from new passenger rail (including light rail) infrastructure investment should be required to plan for the provision of additional housing, including affordable rental housing, within walking distance of new railway stations.

In relation to the Review of the Affordable Housing SEPP, we understand that the Affordable Housing Task Force completed its work many months ago. We urge that the draft proposals that it has prepared should be released for public consultation without further delay. Until this happens it remains unclear what precise mechanisms the Government proposes to use to develop the additional affordable housing that is required.

Diverse housing for a diverse city

Sydney has an ageing and culturally diverse population but housing supply that is constrained and leads to population groups being excluded from certain suburbs and precincts. While this pattern is not restricted to low income or disadvantaged groups, they do experience the negative impacts of such exclusion most severely.

The Draft Strategy talks about planning for a range of housing types that meet the needs of the population, as have past Strategies. NCOSS questions whether there is any empirical evidence that this situation is really improving. The only specific action contemplated in the Draft Strategy is for the preparation of design guidelines for medium density housing (action item 6.4 p. 32).

This is clearly insufficient. NCOSS would suggest that the Department commission a major review of the extent to which Sydney's housing stock is moving towards greater diversity in line with population trends. This review should detail trends across every subregion and local government areas and would provide the community with a factual basis for considering future options.

We note that the Commonwealth Government has funded Livable Housing Australia which has published Livable Housing Design Guidelines² that are supported by a range of stakeholder groups, including industry. There are three levels of voluntary accreditation across both low density and apartment buildings. Livable Housing Australia aims to achieve, on a voluntary basis, a silver rating for all new housing by 2020. NCOSS believes that the NSW Government should make the silver rating requirements mandatory for new housing by an agreed date.

Public housing estates

While public housing constitutes a relatively small proportion of Sydney's overall housing stock, large public housing estates figure quite prominently in a number of subregions and local government areas.

Redevelopment of a number of estates is under way and planning has commenced for the redevelopment of others, including Airds and Redfern Waterloo. Two of the announced Urban Activation Precincts contain significant public housing components. The Government has also announced that it is reviewing the future of its public housing properties in Millers Point.

NCOSS and other groups within our sector have been engaged with Housing NSW and the Land and Housing Corporation about a future policy framework that should apply to redevelopments. This framework must contain suitable protections for both existing and future social housing tenants, involve extensive capacity building and community engagement with tenants, councils and NGOs, and must incorporate rigorous monitoring and evaluation processes.

We oppose the sale of public housing assets in well located locations solely to deliver a short term financial return to the Government, with tenants displaced to more outlying areas. We insist that planning for public housing estate areas, including those located within Urban Activation Precincts, must not be rushed simply to contribute to the achievement of the Government's housing supply targets.

Linking land use planning and human services

NCOSS acknowledges that the current NSW Government is acting to try to better integrate land use planning with the planning and delivery of associated infrastructure. We are concerned, however, that the Government's focus is primarily on economic infrastructure such as water and sewerage, roads, electricity, and railways. Schools and

² Livable Housing Design Guidelines (second edition), Livable Housing Australia 2012 available online at www.lha.org.au

hospitals are the only forms of social infrastructure that are included in current infrastructure planning arrangements.

The Draft Strategy puts forward a number of worthy action items on infrastructure but these appear rather haphazardly. These include reference to the Department preparing Growth Infrastructure Plans to deliver *enabling infrastructure* to support housing development (action items 5.7 p.31, 8.3 p.35, and 16.3 and 16.4 p.55), working with the Commonwealth to bring forward infrastructure projects of joint national and state significance (action item 16.2 p. 55), planning for new schools where existing facilities can't support new enrolments (action item 16.4 p.55), the continuation of the Local Infrastructure Renewal Scheme to provide interest rate subsidies to councils that borrow to fund critical local infrastructure (action item 5.8 p.31), guidance on planning and delivering community facilities (action item 8.1 p.35), and the identification of important cultural facilities and precincts to inform planning and investment decisions (action item 8.2 p. 35),

The missing link here is the absence of any mechanism to link the planning of services funded by the Family and Community Services, Health, and Attorney General and Justice clusters³ with the land use planning undertaken by the Department. It is clear, however, that the Department's intention to speed up the development of new housing and designate new growth areas via Urban Activation Precincts will have immediate impacts on the need for services for a growing population.

NCOSS recommends that the Government develop forward plans for the provision of the necessary range of human services for the Growth Centres, and for substantial urban renewal areas, and link these to the budgetary process of relevant clusters. The Metropolitan Strategy should include a new objective to address this neglected issue.

Healthy planning

Healthy planning considerations do not feature prominently in the Draft Strategy, apart from the promotion of walking and cycling (p. 36). A number of organisations have expertise in this area, including the Premier's Council for Active Living/the Heart Foundation, NSW Health and the Healthy Built Environments Program hosted by City Futures, UNSW.

NCOSS would recommend greater engagement with these bodies in order to devise specific action items in the finalised Strategy.

³ These clusters incorporate agencies including ADHC, Community Services, Corrective Services, Housing, Juvenile Justice and the Legal Aid Commission as well as NSW Health.

Productivity and prosperity

Jobs closer to home

The Draft Strategy plans for an additional 339,000 jobs in Sydney by 2021 and 625,000 additional jobs by 2031 (p. 41). In reality the planning system and planning strategies directly 'create' few jobs; they are more appropriately seen as enablers that assist or hinder other players to do so.

Recent Metropolitan Strategies have all had a focus on moving towards jobs closer to home. Whether progress on that front is being achieved is questionable. Indeed it is notable that the Draft Strategy includes detailed jobs targets for all Strategic Centres and Specialised Precincts between 2011, 2021 and 2031 (p. 42-43). It does not review earlier progress or map what proportion of available jobs are sufficiently close to where people live. This sort of modelling really needs to be done for each Subregion within Sydney.

The Draft Strategy proposes that 50% of new jobs will be in Western Sydney by 2031, higher education options will be available across Sydney and that public transport connections to key employment areas will be improved.

For this to happen more ambitious strategies are required than we have seen to date. Improving public transport access to jobs located in the three Regional Cities is not emphasised in the Long Term Transport Master Plan or to the Specialised Precincts, with the exception of Light Rail to the Randwick Education and Health Precinct.

NCOSS notes that public transport access to the Western Sydney Employment Area, which is to be significantly expanded, is next to non-existent. Similarly the proposed Specialised Precincts at Frenchs Forest, Marsden Park, Penrith and Rydalmere (p.43) will all require vastly improved public transport if they are to be accessible.

Healthy and resilient environment

NCOSS has no comments on this section of the Draft Strategy.

Accessibility and connectivity

Public transport

NCOSS is disappointed that the transport elements of the Draft Strategy focus on improving freight movements and Sydney's motorways. We acknowledge that the

NSW Government is extending the Sydney heavy rail and light rail systems as per its Long Term Transport Master Plan.

We believe that the Draft Strategy needs to address other issues including the role of buses in improving accessibility and connectivity, the transport challenges of an ageing population and the social dimension of the transport challenge.

NCOSS recommends that the Draft Strategy should include performance measures to address congestion, reduce reliance on car travel and to focus on reducing journey times.

Conclusion

NCOSS notes that much of the Draft Strategy is a natural extension of previous work that has been occurring under the 2005 and 2010 Strategies. We acknowledge that it is inherently difficult to achieve consensus about the future planning of a major city like Sydney and are appreciative of the opportunity for stakeholder groups and concerned citizens to comment on the Draft Strategy before its submission to Government. We are concerned, however, that social and equity considerations do not figure sufficiently in the Draft Strategy.

If the Department would like any further information about this submission, please do not hesitate to contact Mr Warren Gardiner, Senior Policy Officer (housing, homelessness, planning and infrastructure) on 02 9211 2599 ext 112 or email warren@ncoss.org.au