

# NCOSS Submission:

Greater Sydney Commission  
District Plans

March 2017

## About NCOSS

The NSW Council of Social Service (NCOSS) works with and for people experiencing poverty and disadvantage to see positive change in our communities.

When rates of poverty and inequality are low, everyone in NSW benefits. With 80 years of knowledge and experience informing our vision, NCOSS is uniquely placed to bring together civil society to work with government and business to ensure communities in NSW are strong for everyone.

As the peak body for health and community services in NSW we support the sector to deliver innovative services that grow and evolve as needs and circumstances evolve.

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## Introduction

The drafting of District Plans and the wider Greater Sydney Commission (GSC) process that they are part of is a rare opportunity to influence and improve the shape of Sydney for the next 20 years and beyond.

It is therefore crucial that the Greater Sydney Commission process engage with all parts of the community to ensure that the resulting plans deliver genuine outcomes improving the liveability, equality, accessibility and sustainability of the city through the coming decades.

As part of the GSC planning process to date, NCOSS co-convened the Social Advisory Panel and we would like to take this opportunity to highlight the work of this Panel, and the range of important issues and recommendations raised by the organisations who contributed to the [Social Advisory Paper](#)<sup>1</sup>. We trust that the GSC will give due consideration to these recommendations whilst welcoming the current opportunity to provide further comment on the draft District Plans. We would also like to express support for the recommendations put forward by Shelter NSW, the Heart Foundation and The Healthy Planning Expert Working Group in their submissions to the GSC process.

In this submission we wish to draw attention to several broad areas of principle that are common across all of the draft District Plans, and reiterate recommendations which seek to strengthen the equity, sustainability and liveability of the GSC planning process.

### More practical linkages between priorities and assessable actions

The draft District Plans address a range of issues and priorities which NCOSS broadly supports. We are happy to see language that establishes the importance of liveability, sustainability, health, well-being, equity and accessibility as integral elements of the Greater Sydney Commission planning processes.

Many of the priorities and actions contained in the draft District Plans, however, are not linked to tangible measures through which outcomes may be achieved (eg. Liveability Priority 6: Relevant planning authorities should facilitate enhanced walking and cycling outcomes by giving due consideration to the delivery of district and regional connections and walkable neighbourhoods). While priorities such as these are laudable in principle, it is crucial that District Plans provide more than 'motherhood' statements. District Plans must provide a strong link between State, Metropolitan and Local planning, and specify clear, practical and assessable actions to achieve better outcomes against each identified priority area.

### Recommendation

- District Plans identify and detail a tangible, practical and assessable set of actions against all priorities. Actions should identify partner agencies and contributors, links to complimentary measures, and have set timeframes for delivery that allow ongoing assessment for effectiveness and progress against desired outcomes.

### Stronger and more consistent measures addressing housing affordability

Sydney has become one of the least affordable cities in the world, with average house prices over \$1 million and rising, a cost which exceeds 12 times the median household income<sup>2</sup>. This is locking a growing number of people out of home ownership and having disastrous impacts upon rental affordability, with the rental affordability index showing that even average income households are reaching the point of housing stress, spending 30% of their

<sup>1</sup> GSC Social Advisory Panel. 'Social Panel Advisory Paper to the Greater Sydney Commission' November 2016.

<https://www.ncoss.org.au/sites/default/files/public/resources/301116%20GSC%20social%20panel%20advisory%20paper.pdf>

<sup>2</sup> The Committee for Sydney: 'Adding to the Dividend, Ending the Divide #3' Issues Paper 14, Jan 2017. P6

income on rent<sup>3</sup>. For households with very-low, low and moderate incomes the availability of affordable housing is at crisis point.

While NCOSS is heartened to see some recognition of the importance of affordability in the draft District Plans, the measures detailed are inconsistent and manifestly inadequate to address an issue that is only likely to become more problematic with the predicted growth of the city in the coming decades. The inclusionary zoning and supporting measures outlined in the draft District Plans set targets that we believe are too low, and are subject to a number of qualifiers and caveats that make it possible they will result in no increase in the provision of affordable housing.

NCOSS supports recommendations from housing and community stakeholders, particularly those raised by Shelter NSW<sup>4</sup>, and recommends stronger measures enabling a significant, citywide increase in the availability of affordable rental housing.

## Recommendations

- Harmonise inclusionary zoning measures implemented through the Greater Sydney Commission planning process, to match those outlined in the current SEPP 70, and provide proactive support for Local Government affordable housing plans to be supportive of those provisions.
- Ensure inclusionary zoning measures are applied across all local government areas in Greater Sydney, recognising that housing affordability impacts people across the entire city.
- Apply inclusionary zoning provisions to 15% of the total floor space area on private developments, and 30% of total floor space of developments on public land.
- Target affordable housing to very low, low and moderate income households in recognition of the widespread issues of housing affordability, and as a means of supporting diversity and long-term sustainability in affordable housing operated by community housing providers.
- Ensure that affordable rental housing facilitated via inclusionary zoning is required not to exceed 30% of household disposable income
- Guarantee that affordable housing facilitated via inclusionary zoning, is not subject to any sunset clauses or time limitations

## Support for Accessible and Adaptable housing

District Plans rightly recognise the need to strengthen the diversity and adaptability of housing across the city, and we welcome this recognition. However, NCOSS believes that the next 20 years of growth and development must set higher standards to ensure that the thousands of new housing units built as part of this process guarantee and improve accessibility, and provide appropriate housing options that better meet the needs of all people throughout their lifetime.

Accessible housing cannot be seen as a luxury or an option applicable to a limited proportion of housing. NCOSS believes that the most cost effective way of achieving the significant change needed is to ensure that a minimum standard of universal accessibility is regarded as a fundamental element of 'good design', much in the way that standards of fire safety, ventilation, and essential service connections have become. Setting higher minimum

<sup>3</sup> SGS Economics & Planning. Rental Affordability Index: tracking Australia's rental affordability nation wide: 2015 [www.sgep.com.au/publications/rental-affordability-index-tracking-australias-rental-affordability-nation-wide](http://www.sgep.com.au/publications/rental-affordability-index-tracking-australias-rental-affordability-nation-wide)

<sup>4</sup> Shelter NSW <https://shelternsw.org.au/file/170301greatersydney-subfinalshelternswpdf>

standards for accessibility and adaptability now, ensures not only that people have greater access to housing that meets their needs, and that this is achieved efficiently and with least impact upon the cost of that housing.

## Recommendation

That the Greater Sydney Commission planning processes support measures requiring all new residential housing be built to meet or exceed the Liveable Housing Australia Silver Standard for accessible housing.

## An objective measure of liveability and access to opportunity

Sydney is characterised by income, opportunity and health outcomes which are heavily dependent upon geography<sup>5</sup>. There is a stark divide between those with access to opportunities for education, employment, health services, social infrastructure, transport and open space, and those without. Access to opportunity, and the range of fundamental services and infrastructure that support a person's quality of life, are the foundation of the concept of liveability. In this context NCOSS welcomes the identification of liveability as a key objective of the District Planning process, and broadly supports the contributors to liveability identified as a basis for the liveability framework outlined in the District Plans.

However, NCOSS is concerned that the baseline 'measure' of liveability used in District Plans is vague and subjective, and has been determined through a simple survey consultation process. The result is that this key piece of data is flawed and does not provide an objective measure of how the current needs of the community are being met. As it stands there is no practical link between the liveability framework, District plan priorities and tangible actions to address them. More importantly, not having an objective and consistent measure of the key elements of liveability undermines the long term ability of plans to inform and link decisions on urban planning, development, health, transport, education and services in a way that helps ensure equity of access and opportunity for people across all areas of the city.

It is necessary that key elements of liveability in the framework are measured objectively, mapped across the city, and able to form the basis of ongoing planning decisions. A consistent indicator of liveability would serve as the crucial link between existing demographics and plans for future population growth and change, informing decisions on density, transport, infrastructure, services and open space provisions.

## Recommendation

That the GSC creates a city-wide Access to Opportunity and Services (ATOS) tool for Greater Sydney, to be used as an objective basis for establishing baseline liveability (through access to an identified range of key services, opportunities and community infrastructure) and informing ongoing planning, infrastructure, development and service provision decisions that will impact key determinants of liveability identified in the framework.

## Stronger measures supporting health and well-being

The built environment plays a crucial role in determining the health and well-being of people, and too often where people live, and the nature of their built environment, has a powerful and ongoing negative impact on their health. In this context NCOSS welcomes the draft District Plans inclusion of measures throughout to maintain access to open space, encourage active transport, and encourage healthy urban environments. However, we believe stronger and more practical measures are needed so that District Plans can ensure the shift to a denser urban future for Sydney maintains and improves the health of all people no matter where they live.

<sup>5</sup> The Committee for Sydney: 'Adding to the Dividend, Ending the Divide #3' Issues Paper 14, Jan 2017.

NCOSS supports submissions from the Heart Foundation and the Healthy Planning Expert Working Group. These submissions contain recommendations that reflect and build upon existing work, such as the NSW Healthy Eating and Active Living Strategy<sup>6</sup> and NSW Health's Urban Development Checklist<sup>7</sup>, which provide practical measures to incorporate health and well-being into processes that shape the built environment. NCOSS would like to further highlight a suite of recommendations which would have a lasting positive effect upon the health and wellbeing of the community, particularly for those from lower socio-economic areas who are currently the most negatively impacted by the built environment.

## Recommendations

- District Plans incorporate district level, integrated transport plans, informed by a Sydney specific ATOS tool, which prioritise active and public transport, and explicitly seek to reduce private vehicle usage. These transport plans should set mode-share targets, map routes, infrastructure and services, identify how to improve connections across LGA and District boundaries, and inform and integrate with citywide transport planning.
- District Plans to support requirement of Health Impact Assessments as a designated tool for engaging communities and other stakeholders in the planning and assessment process, and ensuring that developments above a certain size give structured consideration to the health and well-being of the community.
- District Plans should encourage the development of healthy food environments, including giving due consideration to the availability and accessibility of both healthy and unhealthy foods, supporting retention of local fresh food production in existing areas, and including a productive open spaces plan that sets out guidelines and local templates for the flexible use of public and private open space for local food production and exchange.
- District Plans include an additional action as part of delivering on the green grid, to develop funding criteria that prioritise projects in lower income areas and/or areas of higher need, and develops an alternate funding stream for Councils in lower income areas that cannot match 50 per cent funding for Green Grid projects under the existing funding schemes.
- District Plans include healthy planning expertise (through the Ministry of Health and relevant Local Health Districts) in the development and implementation of guidelines for developing safe and healthy built environments.
- District Plans include additional criteria specifically focussed on access to a diversity of green and open space, and on air quality, solar access and noise exposure, in the criteria assessed in investigating areas for urban renewal.

## Conclusion

NCOSS is grateful for the opportunity to provide further input to the Greater Sydney Commission planning process, and we hope that the submissions from across the community are given due consideration, and help to ensure that the resulting plans contribute to a more equitable, accessible, sustainable and liveable Sydney for all people no matter where they live.

<sup>6</sup> NSW Health. 'NSW Healthy Eating and Active Living Strategy: preventing overweight and obesity in NSW 2013-2018'.

<http://www.health.nsw.gov.au/health/Publications/nsw-healthy-eating-strategy.pdf>

<sup>7</sup> NSW Health. 'Healthy Urban Development Checklist' 2009 <http://www.health.nsw.gov.au/urbanhealth/Publications/healthy-urban-dev-check.pdf>