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Submission:

Greater Sydney Commission Revised District Plans

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The Better Planning Network Inc. (BPN) is an incorporated, volunteer-based, not-for-profit association established in 2012 in response to the then O'Farrell Government's proposed overhaul of NSW planning legislation. Our aim is to advocate for a robust and visionary NSW planning system designed to achieve Ecologically Sustainable Development as defined in the *Protection of the Environment Administration Act 1991 (NSW)*.

Overall issues:

1. The Plans overlook areas that are already earmarked for increased development or are already subject to residential growth pressures. For example in the inner West Council area Sydenham to Bankstown Priority Precinct is identified but the Parramatta Road Corridor is not.
2. The plans now include 'Collaboration Areas' across Sydney as well as Priority Growth Areas and the Priority Precincts. Collaboration Areas focus on centres of economic productivity. The prioritised areas for 2017/18 are GPOP, Western Sydney Airport, Camperdown/Ultimo, Liverpool, Penrith and Randwick. A major issue in these Areas is connected transport. This is a non-statutory initiative and intended to manage transformative urban growth using State Government Plans and will be legally binding under Section 117 Ministerial Directions of the Environmental Planning and Assessment Act 1979. However this lets the discretion on what is included with the minister or his delegate. It is not clear how much of the 'collaboration' discussions will be made public.
3. The government is encouraging 'innovative ideas' for ways to achieve various social outcomes such as affordable housing. Experience has demonstrated that the innovative ideas coming from developers will come with an expectation of bonuses for any social or environmental benefits not required under the Act. From past experience prioritising this approach at a time when significant development is coming is very likely to severely impact the social and environment elements of our communities.

The decrease of Government investment and delivery of affordable housing, public spaces, social and green infrastructure over several decades has eroded social and environmental benefit over several decades.

4. Councils are required to submit their updated LEPs to be consistent with the Regional and District Plan within three years of the finalisation of the District plans. The preparation of a planning proposal is the first step in preparing a LEP. The Planning Proposal is signed-off by the Minister for Planning, the GSC or their delegates - a Gateway determination. However it is not clear what resources if any will be made available to Council to develop the Planning Proposal, LEP and linked DCPs and other policies.

Councils must be adequately resourced to develop LEPs, DCPs and other related policies.

5. The District Plan requires councils to develop local housing strategies (LHS) to:
 - make provision to meet the 5 and 10-year (when agreed) housing targets
 - identify capacity to contribute to a rolling program to deliver the 20-year district strategic supply inform the Affordable Rental Housing target for development precincts and
 - co-ordinate the planning and delivery of local and State Infrastructure.

Delivery of a housing strategy in Council areas in isolation from the new integrated LEP and without collaboration across councils will fragment the process and most likely undermine the long-term Council planning strategies already in place. The targets should be done at the same time as the revised LEPs.

6. The main emphasis in the Plans is increased residential buildings often in areas that are currently zoned light industrial or industrial. The loss of such zonings particularly in areas close to the CBD and Parramatta will result in the loss of employment zones and business supporting many events, start-ups, artists studios and music venues. This is flawed planning and is unsustainable in terms of a liveable and creative community.
7. The Plans show little sign of moving away from the current flawed planning system that pushed through residential development without considering local economic factors, local sustainability and social infrastructure.
8. The Plans recommend that Districts should 'operate within appropriate fiscal limits' and propose getting the most out of existing infrastructure assets - "achieving better utilisation of existing assets increases infrastructure capacity to better support communities and has the potential to minimise or avoid the need to fund additional infrastructure". Given that most infrastructure is already at capacity it is essential that infrastructure requirements are considered and included in the plans with funding agreed during the planning process.
9. Liveability must acknowledge the need for green infrastructure and green canopies for community wellbeing. Planning must include respecting and enhancing the District's natural, cultural and built heritage

Transport

10. Infrastructure Australia (Australian Infrastructure Plan, Feb 2016) previously advised GSC that existing funding options for infrastructure will not provide enough funding for future infrastructure needs. 'Value capture' is proposed as the potential mechanism to fund infrastructure demands, particularly in Collaboration Areas. However the District Plans do not include a methodology for value capture.

Recommendation:

- The methodology for value capture to fund transport infrastructure (not including tollways) to be included and made available publicly for input before the District Plans are adopted. Continued city-wide strategic planning based on private car dependency, including the ongoing expansion of inner city motorways must stop.
11. The Plans include the idea of a 30-minute city, however it is unclear how that will be achieved.

The Plans contain little commitment to improved public, active and connected transport and councils are advising that current transport plans, where shown, do not necessarily align with travel patterns or land use.

12. It appears from recent announcements that VPAs will be a key part of the value sharing mechanism. However these agreements provide bonuses to developers and the funds will take some time to build to up and, as S94 funds have shown, have difficulty keeping up with increasing land costs.

Recommendation :

- Region and District Plans should include a provision for mass public transport that is reliable, efficient and integrated with land use plans as one of the Liveability Planning Priorities.

Affordable Housing

13. Affordable housing is identified but with little commitment to changing land use planning mechanisms to make even the very minimal targets achievable. In addition the targets are flexible and can be moved across Districts. More detail is needed on targets and planning mechanisms for affordable housing.
14. The Plans discuss increasing housing supply as a way to provide affordable housing however experience in Australia and internationally has demonstrated that this is not an effective affordable housing strategy.

The Affordable Housing provides benefits and subsidies for developers. However the arrangements only lasts 10 years and after the 10 years the dwellings are returned to the open market rental or sold.

Recommendation:

- That public land include a minimum of 30% affordable housing and private land 15%.
- The Affordable Housing SEPP to be amended to move dwelling built under the SEPP to the local council or a not for profit affordable housing organisation at the end of the 10 year period.

Schools and childcare

15. Currently available data predict a significant increase in demand for school and childcare places. The District Plan states that School Infrastructure NSW, a new specialist unit within the NSW Department of Education, will work with state agencies and groups to develop schools as community hubs. However the District Plans do not provide details of any future school infrastructure nor Government commitments to accommodate the growth in the number of students. The plans look for 'innovative approaches to the use of land and floor space' implying that schools and childcare can be included in proposed high rise developments. The plans also indicate that because of land prices government will be constrained in its efforts to create new schools on new sites. The Department of Education does not have the funds but the government certainly does and needs to reorganise its priorities. The plan to demolish and rebuild 3 sporting stadiums at taxpayers cost because it makes 'business sense' is an indication of where government 'business rules' sit - squarely in the economic zone with lesser priority to social and environment projects.
16. As a possible solution to overcrowded community spaces the GSC recommends that the use of public schools facilities, church halls or temporary closed streets be used as for social uses as 'resources and funding are limited'. Schools are already under stress and playgrounds are filling with demountables. In some schools children are asked not to run in the playground as it is too crowded.

17. The parents who revealed the flawed school planning data and the increasingly obvious flawed planning prompted a Parliamentary Inquiry that recommended:

“That the NSW Government conduct an audit of public land in all areas of significant population growth in New South Wales to identify suitable locations for new schools and expansion of existing schools.”

Recommendation :

- Using the results of the audit the Department of Education work with local government, the community and the Department of Planning and Environment to develop a plan for the next 20 years for all current school sites, and to identify new required school sites.
- That social and environment factors and infrastructure be given equal weight with economic in future planning.

Open space and sports recreational activities

18. The Plans say that opportunities for additional open space and recreational facilities as ‘resources and funding are limited’. Instead it recommends an increase in shared use of public schools facilities, church halls or temporary closed streets.
19. If public schools are to developed as community hubs the same should apply to non government schools.

Recommendation :

- School Infrastructure NSW should undertake and make public an audit of all public and private school facilities in order to assess the feasibility of schools being developed as ‘community hubs’.
- That clear actions, in addition to the use of existing spaces, to increase open spaces and sports facilities to meet the inevitable demand for significant increases in residents be included in the District Plans.

Aboriginal communities

20. Implementation of the Plan will require awareness and respect for the local Aboriginal communities; recognition of their specific needs; and a commitment to engage with appropriate Aboriginal representatives.

Recommendation :

- The District Plans should recognise that the District’s Aboriginal people comprises many Aboriginal communities and consult respectfully and effectively with local communities.

Cultural hubs/artists

21. The State Government should play a key role in the provision of cultural spaces. Many councils reveal a growing stream of artists leaving Sydney due the lack of affordable housing as well as a lack of affordable artist studios and spaces to work. If Sydney is to retain its status as a thriving global city with strong cultural presence and experiences, it must find ways to retain and support its artists. Artists are most often located in light industrial zoned areas which are being targeted for high density housing.

22. Currently the Inner West has the largest population of artists and makers being forced further out of the city, or leaving Sydney altogether. Feedback from artists reveals that if their current spaces are lost, they face a major battle to find alternative spaces or studios to continue their artistic endeavours.

Recommendation :

- The protection and nurturing of hubs of cultural production, such as Carrington Road on the Bankstown to Sydenham Priority Precinct. To foster the creative arts and culture there is a need for integrated and innovative actions, including provision of affordable housing for artists and creative practitioners who can be financially vulnerable.
- That the GSC strongly advocates the retention and protection of the current stock of industrial, employment and urban services land suitable for cultural hubs and artist studios.

Green spaces and tree canopies

23. The Plans indicate that the cost of land is a barrier to increasing green spaces and tree canopies. Land for open space should be identified upfront and funding mechanisms identified in District Plans. In order to deliver the Green Grid there is very likely to be the need for government to acquire land for open spaces and tree canopies. Calling green strips along roads and streets and the waterfront 'linear parks' is very misleading and will in no way meet any green space needs for a liveable and healthy city.
24. There is no clear mechanism in the Green Grid or the District plans for funding the Green Grid.
25. The State Government must commit to funding key social infrastructure, such as the Greater Sydney Green Grid, as Councils will not be able to fund due to caps on S94 contributions, rate caps and the likely significant timeframe for value capture funds to become sufficient for any significant social infrastructure to match the scale of planned developments.

Recommendation :

That the District Plans include actions to:

- protect and enhance bushland and biodiversity.
- increase the urban tree canopy including diversity of vegetation structures and ground cover.

Community consultation and involvement in decision-making

26. The community consultation process includes no changes to make the consultation more than a token process or a marketing process.

Recommendation :

- That the GSC set up community expert groups on the full range of social impacts issues to advise on District and local planning impacts.
- These community committees be provided an advisory status at least equal to developers.