

**Submission to the Department of  
Planning and Infrastructure  
Metropolitan Strategy Review  
*Sydney over the next 20 years***



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## **About NCOSS**

The Council of Social Service of NSW (NCOSS) is the peak body for the non-government community services 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 contribute to the review of the Metropolitan Strategy and to respond to the policy issues canvassed in the Discussion Paper<sup>1</sup>.

We note that the 2005 Strategy<sup>2</sup> was the subject of an extensive review<sup>3</sup> in 2010 to which stakeholder groups, including NCOSS, contributed. We believe that the key directions of the resulting Metropolitan Plan<sup>4</sup> enjoyed strong support from key interest groups and are not in need of fundamental review.

We are, however, strongly supportive of the current Government's desire to work towards a greater integration of long term plans for land use planning, infrastructure and transport within the overall framework of *NSW 2021*. This is consistent with the approach NCOSS has been advocating for a substantial period of time.

We suggest that the short term priority must be to seek to ensure the greatest degree of integration between the forthcoming State Infrastructure Strategy and Long Term Transport Master Plan with an updated Metropolitan Strategy.

The Discussion Paper notes that recent metropolitan plans for Sydney have had two particular emphases.

*The first is the importance of centres as the building blocks of Sydney's urban form. As the Discussion paper says, "the clustering of activity in centres helps reduce urban sprawl, locates similar businesses together for productivity benefits and gives people the opportunity to live closer to jobs and services"*<sup>5</sup>

In our experience, this approach enjoys strong stakeholder support and does not need fundamental re-examination. The progress of individual centres does, however, require ongoing monitoring and additional measures taken where anticipated progress is not occurring in a timely fashion.

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<sup>1</sup> *Sydney over the next 20 years: a discussion paper*, Department of Planning & Infrastructure, May 2012.

<sup>2</sup> *City of Cities: a plan for Sydney's future*, Department of Planning December 2005.

<sup>3</sup> *Sydney Towards 2036: Metropolitan Strategy Review discussion paper*, Department of Planning, March 2010.

<sup>4</sup> *Metropolitan Plan for Sydney 2036*, Department of Planning, December 2010.

<sup>5</sup> *Sydney over the next 20 years* p. 10.

NCOSS has previously noted that the designation of Liverpool and Penrith as additional regional cities has not been accompanied by any explicit plans to ensure that those centres obtain over time the higher level facilities, infrastructure and educational and employment opportunities that has long characterised the CBD, and that Parramatta has been progressing towards over the past two or three decades. That is a challenge that requires much more explicit attention than we have seen to date.

*The second emphasis cited in the Discussion Paper relates to Sydney as a global city. We accept that there is a degree of tension inherent in deciding whether future infrastructure investment should be prioritised towards building a stronger 'global' city compared to a more liveable 'local' city. The answer is of course that a balanced approach is required.*

NCOSS does not support designating narrow parts of Sydney as constituting the 'global' city, relegating the areas where the majority of the population live and work as being of lesser importance. The danger of such an approach is that opportunities to achieve substantial improvements in productivity and liveability outside either the CBD or the so-called 'global' arc<sup>6</sup> might be neglected, to the long term detriment of Sydney as a whole.

In our view Sydney's success as a global city depends on the functioning of the entire metropolitan area, just as the same would be said of competitor global cities like Singapore, Tokyo or Shanghai.

## **Specific issues**

The Discussion Paper raises nine specific challenges on which feedback is sought. We deal with these specific issues in the order in which they appear.

### *Housing our growing population*

The Discussion Paper suggests that Sydney will require an additional 570,000 dwellings by 2031<sup>7</sup>. This is a smaller number of dwellings over a shorter timeframe than outlined in the 2010 Metropolitan Plan<sup>8</sup>.

The 2010 Plan proposed that at least 80% of all new homes should be built within the walking catchments of existing and planned centres of all sizes with good public transport, and that at least 70% of new homes should be built within the existing urban area<sup>9</sup>. NCOSS

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<sup>6</sup> Generally thought to refer to a corridor linking Port Botany-Airport-CBD-North Sydney-St Leonards-Chatswood-Macquarie Park. This was the terminology used at the time of the 2005 Metropolitan Strategy; since the 2010 Metropolitan Plan there has been a shift to describing the CBD-North Sydney as being 'Global Sydney'.

<sup>7</sup> *Sydney over the next 20 years*, p.12.

<sup>8</sup> The 2010 plan suggested that 770,000 extra dwellings would be required by 2026, see *Metropolitan Plan for Sydney 2036* p. 14.

<sup>9</sup> *Metropolitan Plan for Sydney 2036*, p.14.

welcomes the fact that the first commitment is restated in the Discussion Paper. We are concerned, however, that the Discussion Paper is silent regarding the commitment that at least 70% of Sydney's new housing should be concentrated in the existing urban area. NCOSS believes there are strong economic, social and environmental reasons to remain committed to that approach.

The Discussion Paper notes that sufficient land for more than 62,000 dwellings has been rezoned in greenfield areas over the past five years but that this increase in land available for development has not led to increased housing production. NCOSS believes that this is an important finding that requires careful consideration by policy makers. It appears to us that there is a clear contrast between the level of housing production in the North West Growth Centre compared to the South West Growth Centre.

NCOSS does not believe that the apparent decline in demand for fringe area housing in South West Sydney should result in the Government considering landowner requests for large scale rezoning beyond the designated boundaries of the Growth Centres. This would result in poorly sequenced development across a wider area, further removed from existing infrastructure and services, without any guarantee that the overall level of housing production would increase.

As indicated elsewhere in the Discussion Paper, we may in fact be seeing shifts in market demand for different types of housing, including unmet demand for semi-detached dwellings such as terraces and townhouses in middle ring suburbs<sup>10</sup>, close to employment, facilities and services.

In relation to **affordable housing**, it is frustrating to observe that insufficient progress has been made in developing and implementing measures to expand the supply of affordable rental housing in Sydney. NCOSS believes that:

- the Metropolitan Strategy and the subsequent Sub-regional Strategies 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.
- 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.

As NCOSS is participating in the review of the *Affordable Rental Housing SEPP*, we will comment on proposed changes to those arrangements when the interim report of the Affordable Housing Task Force and the Government's Draft Action Plan are released together in the near future.

### *Providing jobs & economic opportunities*

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<sup>10</sup> As detailed in *The housing we'd choose*, The Grattan Institute, June 2011. They calculated that there is a 13% mismatch between demand and supply of semi-detached housing in Sydney, see p. 20.

Providing more jobs closer to home should remain a key objective of the Metropolitan Strategy. In this regard there is a clear need to focus much more explicitly on the expansion of jobs and economic opportunities in high growth sub-regions, particularly South West Sydney.

#### *Providing efficient transport networks*

NCOSS has long advocated the need to more closely align transport and land use planning. There are many past examples of new population centres being developed without corresponding public transport infrastructure being put in place in a timely fashion. Combined with the demand for new infrastructure to accompany future growth, current spending levels mean that Sydney is likely to be always playing catch up as far as public transport provision is concerned.

In this regard NCOSS welcomes the decision of the NSW Government to develop the NSW Long Term Transport Master Plan<sup>11</sup> and awaits with interest its finalisation later in the year.

#### *Providing the infrastructure we need*

NCOSS welcomes the Government's commitment to better integrate infrastructure planning and delivery with land use planning. We support the view that a place-based approach is necessary.

The Discussion Paper notes that the Department of Planning & Infrastructure is providing 5 and 10 year forecasts of dwelling production to infrastructure funders and providers and is seeking to align the delivery of economic infrastructure such water, roads, electricity and sewer infrastructure with new housing development in greenfield areas<sup>12</sup>.

NCOSS **recommends** that these arrangements be extended to social infrastructure, including schools and health facilities, and that forward plans for the provision of the necessary range of human services be developed for the Growth Centres and for substantial urban renewal areas.

#### *Providing equitable access to a great lifestyle*

Currently there are marked differences in access to social, economic and recreational opportunities experienced by people living in different parts of Sydney and by disadvantaged groups. Many of these inequalities are linked to forces that are independent of what the Metropolitan Strategy contains.

In terms of place-based approaches to reducing concentrations of disadvantage, Housing NSW and the NSW Land and Housing Corporation are proceeding with a number of public

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<sup>11</sup> The NCOSS response to the Discussion Paper for the NSW Long Term Transport Master Plan is available online at [http://www.ncoss.org.au/component/option,com\\_docman/task,doc\\_download/gid,716/Itemid,78/](http://www.ncoss.org.au/component/option,com_docman/task,doc_download/gid,716/Itemid,78/)

<sup>12</sup> *Sydney over the next 20 years* p.20.

housing redevelopment projects. These projects entail both risks and opportunities, and need to be sensitively managed and properly monitored and evaluation.

NCOSS has previously noted that there are no current models for regeneration of suburban private rental communities that experience comparable disadvantage to public housing estates<sup>13</sup>.

NCOSS also believes that much more can be done to make both housing and public facilities more accessible to a diverse and ageing population. In our state election platform we detailed a number of specific measures that need to be taken to make multi-unit housing adaptable and visitable, and to improve access to train stations, community centres and libraries<sup>14</sup>.

#### *Protecting our environment & building resilience to natural hazards*

NCOSS supports the need to adapt to, and plan for, predicted climate change and to implement further measures to improve the energy and water efficiency of residential, commercial and industrial buildings.

#### *Protecting productive rural & resource lands*

Balancing the land requirements of a growing population and the need for land for agriculture and resources are an integral part of proper land use planning. NCOSS supports protecting valuable agricultural land, water catchments and biodiversity by limiting urban sprawl.

#### *Connecting with the regions*

The NSW Long Term Transport Master Plan should address priorities for improving the connections between Sydney and other NSW regions. As noted in the Discussion Paper, the relatively high proportion of the Central Coast and Illawarra workforce that commutes to Sydney for work can only be reduced by the provision of better jobs closer to home<sup>15</sup>.

#### *Delivering the strategy*

NCOSS has long noted that reporting on the delivery of Metropolitan Strategy commitments has been poor. We believe that the final strategy should include agreed timelines and clear agency responsibilities for priority action items, complemented by an annual and public, monitoring report.

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<sup>13</sup> *Vote 1 Fairness in NSW*, NCOSS, March 2010, p. 47. Available online at [http://www.ncoss.org.au/component/option,com\\_docman/task,doc\\_download/gid,542/Itemid,78/](http://www.ncoss.org.au/component/option,com_docman/task,doc_download/gid,542/Itemid,78/)

<sup>14</sup> *Vote 1 Fairness* p. 48

<sup>15</sup> *Sydney over the next 20 years* p.28. Currently a quarter of the Central Coast workforce and a sixth of the Illawarra workforce commutes to Sydney.