

LGNSW Submission to the Greater Sydney Commission – Sydney Region Plan and Draft District Plans

February 2018

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Executive Summary

- This submission focuses on the Draft Sydney Region Plan (the Draft Plan) rather than the five revised district plans. Local Government NSW (LGNSW) made a detailed submission on the draft District Plans earlier this year and many of the observations and recommendations in that submission remain pertinent.
- LGNSW welcomes recognition in the Draft Plan of the importance of “infrastructure supporting new developments” as the first of the 10 Directions. Local government has been calling for alignment of land use and upfront infrastructure for many years. However, detail is required on how this will become the reality.
- Funding will be critical, and work to resolve major funding shortfalls for local infrastructure is urgently needed. For this reason, the LGNSW submission on the Draft District Plans welcomed the Greater Sydney Commission’s (GSC’s) consideration of value capture as a credible funding mechanism. There is a sense in this Draft Plan that the Commission is taking a step back from its earlier position on value capture in the Draft District Plans. This must be reversed - councils see value capture as critical to obtaining sufficient funding for much needed infrastructure, especially in renewal areas.
- LGNSW welcomes the inclusion of metrics for the first time - such measures are critical for determining whether the Regional Plan is achieving its objectives over time. We believe additional metrics are needed, for example in relation to objectives for liveability and ‘great places’. Other metrics need to be re-worked or revised so they can be used as a proper target or measure of improvement.
- LGNSW is concerned that there are a number of areas which the Draft Plan clearly states are “not Government policy”. If the Government does not endorse this Draft Regional Plan, there are consequences for the Revised District Plans, which are prepared and approved by the GSC.
- LGNSW supports the concept of collaboration which underpins the Growth Infrastructure Compacts. However, the relationship of the GSC’s Growth Infrastructure Compacts and Collaboration Areas with other major planning initiatives currently underway (such as Priority Growth Areas and Priority Precincts) is unclear.
- Local government will be vital in delivering the key productivity, liveability and sustainability priorities, therefore councils must be treated as partners in this process. LGNSW specifically seeks further information about how local government will be engaged in finalising the District Plans and in the delivery phase, as well as clarification of the role of District Commissioners during implementation.
- It is disappointing that the Draft Plan’s 14 Actions do not have timeframes.
- It is pleasing to see the plan includes specific objectives and actions for implementation (Objectives 39 and 40, and chapter 8). The lack of a meaningful implementation plan and monitoring was a major flaw of previous metropolitan strategies. There is a greater sense of a cross-agency commitment to this Draft Plan compared with past metropolitan plans.

1. Opening

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing all NSW general-purpose councils and associate members including special-purpose county councils. LGNSW facilitates the development of an effective community based system of local government in the State.

This submission is a response to the Greater Sydney Commission's (GSC's) request for feedback on the *Draft Greater Sydney Region Plan* (the Draft Plan) and the five draft District Plans as revised following GSC consultation 12 months ago.

LGNSW welcomes the opportunity to make a submission on these important strategic plans for the metropolitan area.

This submission is structured to address both:

- General comments on metropolitan and district planning, highlighting key concerns for local government (section 3); and
- Specific comments on the 10 Directions of the draft *Greater Sydney Region Plan* (Draft Plan) (section 4).

The submission should be read in conjunction with councils' submissions. It does not comment on the content of individual draft District Plans; this is a matter for councils in each district.

LGNSW's submission on the Draft District Plans and *Towards Greater Sydney 2056* (April 2017) contained a number of questions and recommendations, many of which remain relevant in this submission. These are summarised in Attachment 1.

2. Background

LGNSW made a comprehensive submission on the Draft District Plans in April 2017. While the GSC has been evolving the new Draft Sydney Region Plan and refining its draft District Plans, several notable events have affected metropolitan councils. Foremost among these changes are:

- The NSW Government reversed its amalgamation policy in July 2017, restoring certainty to 14 metropolitan councils whose planning had been in a state of flux due to uncertainty around forced amalgamations;
- 20 new metropolitan councils were elected in September 2017 (6 of which were under administration for 16 months¹);
- Significant amendments to planning legislation were enacted in August (mandating independent hearing and assessment panels (IHAPs) for all Sydney councils) and October 2017;
- The *Draft Future Transport Strategy* and supporting transport plans have been released for public comment, none of which were available when councils were responding to the draft District Plans earlier this year; and

¹ Councils under administration May 2016 - September 2017: Bayside, Canterbury-Bankstown, Cumberland, Inner West, Northern Beaches, Parramatta

- The community is voicing mounting concern about Sydney's growth and its impact on local infrastructure, liveability and amenity.

These key events provide relevant and important context for this submission, which supplements the submission made by LGNSW earlier this year.

3. General comments

3.1 Metropolitan-wide planning in a State-wide context

LGNSW has argued for many years that strategic planning for Greater Sydney (as well as the non-metropolitan regions) should occur within a wider whole-of-state-development context. Historically, this state-wide context has been notably absent from metropolitan and regional planning. The Greater Sydney Region has important interfaces with its immediate neighbours (the Central Coast, Lower Hunter, Wollongong and Illawarra and the Southern Highlands). Greater Sydney also has strong economic and social linkages to all other regions of the State.

It is pleasing to see that these interfaces, future connections and their implications for further long term growth have at least been recognised in the Draft Plan². However, there is no reference to Sydney's growth in context with surrounding parts of NSW. NSW still lacks a state-wide population growth and settlement plan and this should be pursued by the Department of Planning and Environment (DP&E) and other State agencies.

The challenges confronting NSW include increasing congestion and other environmental problems associated with the growth of Sydney; population decline in rural areas; rapid population growth in 'lifestyle' regions of the north and south coast and across Sydney; and ongoing structural change in industrial regions (Wollongong and Newcastle). A mix of new policy initiatives or strategies which locate population growth outside of Greater Sydney would complement existing strategies for accommodating growth within Sydney itself.

3.2 Securing NSW Government commitment to the regional plan

LGNSW notes that the Draft Plan is a document by the GSC for consultation and ultimately for the NSW Government's consideration. GSC Chair Lucy Turnbull in her introduction states:

"This is the first regional plan by the Greater Sydney Commission, an independent agency responsible for leading metropolitan planning for Greater Sydney. It is therefore not Government policy. However it was developed in collaboration with a range of State agencies and councils so that the delivery of new housing and jobs can be supported by transport and local infrastructure."³

The Draft Plan reflects position statements from the GSC that have been well-received by local government. In particular, councils welcome targets for affordable housing (Objective 11), the protection of employment lands (Objective 23) and increasing tree canopy cover (Objective 30). If the Government does not endorse the Draft Plan, this will affect these and other important new policy initiatives. Likewise, the GSC's proposed Growth Infrastructure Compacts, which are a critical new element in the Draft Plan, will fail without Government endorsement.

² Draft Sydney Region Plan, p 70 (productivity) and p 84 (regional transport)

³ Draft Sydney Region Plan, p 3

LGNSW expects to see NSW Government endorsement of the Draft Plan, given that it has been developed “in collaboration with a range of State agencies and councils” and appears to have strong agency support.

Key question:

- 1 What does it mean for the GSC’s District Plans if the NSW Government does not endorse the GSC policy directions/recommendations contained in the Draft Regional Plan?

3.3 Role of local government

Local government is vital to the successful delivery of all 10 Directions in the plan, despite being nominated as the lead agency for just one of the 14 Actions in the Draft Plan (i.e. ‘Action 2 - Prepare housing strategies’). Democratically-elected local government plays an provides a vital, well-accepted mechanism to represent the community views in planning processes. LGNSW therefore appreciates the opportunity for councils to have input on the revised District Plans following the local government elections in September 2017.

Local government must be a partner in delivering the strategies and actions in the regional and district plans. This is relevant not only to delivering housing in growth areas but also to the formulation of policies which support many of the other objectives in the Draft Plan.

Key questions:

- 2 What mechanisms will be in place for councils to have ongoing dialogue with the GSC on the implementation of the Regional and District Plans?
- 3 What will be the role of the District Commissioners during implementation/delivery?

3.4 Funding infrastructure through value capture

Funding will be a critical element of infrastructure plans and delivery, however the traditional infrastructure funding mechanisms – federal funding; state infrastructure contributions; local infrastructure investment; local (section 94) development contributions and voluntary planning agreements (VPAs) – are inadequate, or not sufficiently flexible to meet backlog and growth needs. Local government has for many years sought action to resolve major funding shortfalls for local infrastructure.

The LGNSW submission on the Draft District Plans (April 2017) welcomed the GSC’s consideration of value capture as a funding mechanism to be further investigated. However, it appears that the Commission is taking a step back from its position on value capture presented in the Draft District Plans. Value capture – or value sharing, as the GSC refers to it - is notably absent in the Revised District Plans. Similarly, in the Draft Regional Plan it receives heavily-qualified references with the GSC declaring:

“The Commission recognises that development needs to support the funding of infrastructure at an appropriate level, but should not be unreasonably burdened to the extent that development becomes unviable...Whilst value sharing may provide a useful contribution to project funding, the Commission recognises that it will not form a major part of the funding equation in most cases.” (refer p 29-31).

Disappointingly, this suggests the GSC – and most likely the NSW Government – are stepping away from considering value capture as a significant funding mechanism. Councils

see value capture as critical to obtaining sufficient funding for much needed infrastructure, especially in renewal areas and many are advocating for value capture mechanisms other than VPAs to be developed and finalised urgently. To prevent market uncertainty over future land value uplift, this needs to happen before planning proposals are prepared. The GSC and NSW Government need to make a commitment to value capture as a funding option as part of approval of any planning proposals/up-zonings.

Key question:

- 4 What action will be taken to review value capture mechanisms other than VPAs to for public benefit?

4. Specific Comments on 10 Directions in the Draft Greater Sydney Region Plan

The tables in this section contain specific comments on the Draft Plan. The comments are structured to address the 10 Directions, 40 Objectives and their supporting Metrics and 14 Actions (as summarised on pages 14-15 of the Draft Plan).

4.1 Infrastructure and Collaboration

- LGNSW welcomes recognition of the importance of “infrastructure supporting new developments” as the first of the 10 Directions in the Draft Plan. Local government has been calling for alignment of land use and (upfront) infrastructure for many years.
- As noted previously, LGNSW is concerned the Commission is taking a step back from the position on value capture it presented in the Draft District Plans. LGNSW calls for the Draft Plan to include actions to support adequate funding for local infrastructure (e.g. revision of restrictions on Section 94 contributions, value capture and VPAs).
- LGNSW supports the concept of Growth Infrastructure Compacts. However, the relationship of the GSC’s Growth Infrastructure Compacts and Collaboration Areas with all the other major planning and development initiatives currently in play (in particular, Priority Growth Areas and Priority Precincts) is unclear.

Specific comments on the Directions, Metrics, Objectives and Actions in *Chapter 3 Infrastructure and collaboration* are provided in the table below.

	Infrastructure and Collaboration	LGNSW Comments
Direction	A city supported by infrastructure – Infrastructure supporting new developments	
Metrics	Number of land use plans supported by infrastructure plans	<ul style="list-style-type: none"> • This metric has no target...Rather than “<i>Number of land use plans...</i>” it should be reworded as “<i>All</i> land use plans are supported by...”. The approach must be adopted for all growth areas (not just the Greater Parramatta and the Olympic Peninsula (GPOP). • A ‘plan’ doesn’t necessarily guarantee delivery of the infrastructure. How can communities and councils be assured the infrastructure will be delivered?

	Infrastructure and Collaboration	LGNSW Comments
		<ul style="list-style-type: none"> • The scope and implementation of this metric is unclear; DP&E is doing its own planning for ‘priority growth areas’ and ‘priority precincts’ and the like, which appears to be separate/different from the ‘growth infrastructure compact’ approach. <p><u>Key questions:</u></p> <ol style="list-style-type: none"> 5 What is meant by a ‘land use plan’ and an ‘infrastructure plan’? How are these plans defined? Is the ‘land use plan’ the same thing as the ‘Place Strategy’ (referred to on p 26)? What form will these take? 6 Will these infrastructure plans be in place for all growth areas? 7 Who will prepare these plans? 8 Will all agencies have responsibility and accountability for delivery of these plans?
Objectives	<ol style="list-style-type: none"> 1: Infrastructure supports the three cities 2: Infrastructure aligns with forecast growth 3: Infrastructure adapts to meet future needs 4: Infrastructure use is optimised 	<ul style="list-style-type: none"> • Objective 2 – LGNSW supports the concept of Growth Infrastructure Compacts (discussed on p 28-31 of the Draft Plan), and in particular the critical outcomes: <ul style="list-style-type: none"> ○ Align growth with infrastructure; ○ Fund and finance infrastructure; and ○ Sequence infrastructure with growth. • The relationship of the GSC’s Growth Infrastructure Compacts and Collaboration Areas with all the other major planning and development initiatives (e.g. Priority Growth Areas and Priority Precincts) currently in play is very unclear. The various approaches summarised in Table 1 of the Draft Plan (e.g. Priority Precincts, Priority Growth Areas, etc.) illustrate this complexity and the potential for confusion and overlap. • LGNSW welcomes GSC acknowledgement that “many councils are limited in their ability to invest in infrastructure and its maintenance within the current settings for rates and Section 94 development contributions for local infrastructure” (p 31). Local government has for many years called for resolution of these major funding shortfalls for local infrastructure, including advocating for value capture mechanisms other than VPAs to be developed. • The plan appears to be lacking detail on how value capture policy mechanisms will be developed and actioned. LGNSW advocates that the Draft Plan includes specific action to “explore and, where appropriate, trial opportunities to share value created by the planning process and infrastructure investment (such as rail) to assist funding infrastructure” (refer p 31). • Some comments in the Draft Plan in relation to funding suggest that some of the aspirational goals for liveability may be compromised ultimately by funding constraints: “there is a need to continue to work within fiscal limits and manage community expectations for infrastructure whilst achieving this Plan’s objectives to create great places” (refer p 31). • Objective 3 – <ul style="list-style-type: none"> ○ LGNSW supports shared use of facilities where terms are agreed by state agencies and individual councils and provided that it does not involve cost shifting onto local government. ○ It is unclear who is responsible for implementing this objective ○ In areas where sites are surplus to one agency’s needs, LGNSW recommends that the Draft Plan should adopt the principle that

	Infrastructure and Collaboration	LGNSW Comments
		<p>adaptive reuse should be considered first, rather than divestment, to ensure strategic assets are not lost to changing communities.</p> <ul style="list-style-type: none"> Objective 4 – unclear – use of ‘plain English’ would make this section clearer. Some examples would be helpful to illustrate possible outcomes of this objective. <p><u>Key questions:</u></p> <p>9 How are all the precinct plans, priority growth areas and collaboration areas being rationalised/managed/coordinated?</p>
Direction	A collaborative city – Working together to grow a Greater Sydney	
Metrics	Proportion of agreed outcomes achieved in Collaboration Areas	<ul style="list-style-type: none"> Unclear how this will be measured. In order to assess whether an ‘outcome’ has been achieved, each ‘outcome’ itself will need its own measure. <p><u>Key questions:</u></p> <p>10 The ‘outcomes’ may have long lead times. Over what time period will this be measured?</p>
Objectives	Objective 5: Benefits of growth realised by collaboration of governments, community and business	<ul style="list-style-type: none"> There appears to be repetition and overlap between Objective 5 and Objective 39 (‘a collaborative approach to city planning’). The distinction between Objectives 5 and 39 should be made clearer to avoid confusion. <p><u>Key questions:</u></p> <p>11 The process for Growth Infrastructure Compacts is illustrated in Figure 7 (p 28) in the Draft Regional Plan. Where does community input fit in this process?</p> <p>12 Is an Infrastructure (Delivery) Plan the output of this process?</p>
Action	Action 1 - Identify, prioritise and deliver Collaboration Areas (refer to Objective 5)	<ul style="list-style-type: none"> LGNSW supports the GSC’s intention to review the Collaboration Area program and priorities annually (referred to on p 35 of the Draft Plan). <p><u>Key questions:</u></p> <p>13 What is the difference between (or what is meant by) a Collaboration Area and a Growth Infrastructure Compact?</p>

4.2 Liveability

Housing Targets

- The setting of housing targets is supported by local government provided the targets are evidence-based and linked to capacity, together with commitment and actual delivery of infrastructure. Local government is understandably cautious about the ambitious housing targets contained in the Draft Plan and Revised District Plans. The delivery of the housing targets must also be staged to ensure it aligns with the delivery of upfront infrastructure. While housing supply is generally not an issue for most councils in the next 5 years, the challenge is enormous on the 5-20 year horizon.
- Councils will be under tremendous pressure to review their areas and identify how they intend to achieve the housing targets. LGNSW urges the GSC to work in

partnership with local government to determine the 6-10 year and 20 year targets and to address other issues such as housing affordability.

Place-based planning

- LGNSW strongly supports the concept of place-based planning (discussed on p 38 of the Draft Plan). Councils have an important role in providing a local voice to create amenity and liveability in their local areas.
- LGNSW and councils welcome the priority of 'creating great places' but the challenge is that councils have no readily available funding mechanisms to meet this expectation.

Housing supply and affordability

- LGNSW disputes the premise that increased housing supply will deliver housing affordability and faster development approval processes will increase housing supply. Sydney still has an affordability issue despite record dwelling approvals and completions. The major factors contributing to Sydney's housing affordability crisis are beyond the influence of local government and are on the demand side. For example: low interest rates and high credit availability; high population growth; Sydney's attraction as a global city; high levels of foreign and domestic investment; the commodification of housing stock as a financial investment; and tax incentives such as negative gearing.

Affordable housing targets

- LGNSW has welcomed the inclusion of an affordable housing target, however councils are broadly of the view that it does not go far enough;
- There needs to be an agreed definition of "affordable" and this should include rents for affordable housing that are capped or fixed as a percentage of household income.
- The Draft Plan needs to include tangible policy mechanisms and actions (including timeframes and responsibilities) that will ensure delivery of affordable rental housing at least to the minimum target level proposed in the plans.
- The GSC should work collaboratively with LGNSW, councils and the relevant state and housing bodies to agree on affordable housing targets and how these can be delivered at a district and local level.

Liveability targets/indicators

- The Draft Plan needs targets for 'liveability' - meaningful actions and measurable outcomes (metrics) aimed at achieving 'great' places.

Local housing strategies

- Relevant councils must be consulted well before the NSW Government makes announcements about new priority precincts and other major projects. Priority precincts should be in areas that have been identified by councils in their local housing strategies accordingly, rather than being identified via a parallel process outside the housing strategy.

Medium density code

- Councils oppose any blanket medium density housing code being imposed on their areas, and must be afforded the opportunity to identify the preferred locations for medium density housing through their local planning strategies.

Specific comments on the Directions, Metrics, Objectives and Actions in Chapter 4 Liveability are provided in the table below.

	Liveability	LGNSW Comments
Direction	A city for people – Celebrating diversity and putting people at the heart of planning	<ul style="list-style-type: none"> • Councils play a critical role in place-based planning – they have a wealth of local and district knowledge, understand their communities’ expectations and are committed to protecting and enhancing their locally distinctive attributes and strengths. <p><u>Key questions:</u></p> <p>14 What is the relationship between ‘place-based’ planning and a ‘collaborative approach’ (Objectives 5 and 39)?</p>
Metrics	Annual survey of community sentiment	<ul style="list-style-type: none"> • This is more of an action rather than a metric/measure. The metric should be a measure of <i>improvement in community sentiment</i> as determined by an annual survey. This means starting with an initial/baseline survey from which any improvements can be observed annually through the survey. • Need metrics for schools, hospitals, open space etc. <p><u>Key questions:</u></p> <p>15 Will the GSC undertake the annual survey? Who pays for the survey?</p> <p>16 What is this annual survey intended to measure?</p> <p>17 How will the information from the survey be used to inform/review policy? What will the GSC do with the survey information?</p>
Objectives	<p>6: Services and infrastructure meet communities’ changing needs</p> <p>7: Communities are healthy, resilient and socially connected</p> <p>8: Greater Sydney’s communities are culturally rich with diverse neighbourhoods</p> <p>9: Greater Sydney celebrates the arts and supports creative industries and innovation</p>	<ul style="list-style-type: none"> • The preamble to <i>Chapter 4 - Liveability</i> (pages 37-39) touches on many important elements of liveability (social infrastructure, health, arts and culture, heritage, inclusivity, diversity, accessibility, housing choice and affordability, etc.). However, with the exception of actions and metrics for housing, this chapter fails to be specific about fundamental liveability indicators to support growth – social, open space, public transport, education, health and employment needs. The absence of specific actions, policies and metrics to deliver ‘liveability’ calls into serious question the commitment to deliver on these important outcomes.
Direction	Housing the city – Giving people housing choices	
Measures	<ul style="list-style-type: none"> • Number of councils on 	<ul style="list-style-type: none"> • The increased housing targets allocated to some areas are

	<p>track to deliver housing targets</p> <ul style="list-style-type: none"> Number of councils with schemes that implement Affordable Rental Housing Targets 	<p>ambitious and unachievable without upfront infrastructure support from the NSW Government, while in other areas they are appreciably lower and relatively straightforward to accommodate. This raises questions about social equity and what should constitute a fair and reasonable distribution of ambitious housing targets across the region.</p>
	Liveability	LGNSW Comments
		<p><u>Key questions:</u></p> <p>18 How will the 20 year growth targets across each district and within each LGA be formulated?</p> <p>19 Will there be consequences for local government in the case of failure to achieve development targets set by the GSC?</p> <p>20 What happens when the ‘targets’ are reached? The idea of a ‘target’ falsely raises community expectations that there will be no further development or growth pressure if they reach their ‘target’.</p>
Objectives	<p>10: Greater housing supply</p> <p>11: Housing is more diverse and affordable</p>	<ul style="list-style-type: none"> Objective 10: <ul style="list-style-type: none"> A lot appears to be weighing on councils’ local housing strategies to achieve promised housing choice, supply, diversity, affordability and even liveability. LGNSW welcomes funding of \$25 million to support councils to prepare these strategies (p 54), however equivalent funding should be made available to all councils, not be limited to 10 ‘priority’ councils. (See comments also under Objective 39 – Implementation). As the Draft Plan indicates in Table 1 (refer p 34) many agencies have a leading role in these priority projects – the GSC, DP&E, UrbanGrowth or Landcom for example. All those with primary responsibility should be required to engage with councils early in the process. Councils are in the best position to determine the preferred locations for growth in their LGAs, including those areas that are unsuitable for significant change. LGNSW welcomes acknowledgment that development of local housing strategies will “be aligned with councils’ community strategic planning and inform council infrastructure investments and service programs” (p 52). Strategic decisions on local land use must be guided by the objectives/outcomes identified through the community strategic planning process. Objective 11: <ul style="list-style-type: none"> The market is unlikely to provide much of the required affordable housing in many areas. LGNSW supports the inclusion of a target for affordable housing. However, planning mechanisms that enable inclusionary zoning are needed if the proposed affordable rental housing targets are to be effectively delivered.
Actions	<p>2: Prepare housing strategies (refer to Objective 10).</p> <p>3: Develop 6–10 year housing targets (refer to Objective 10).</p> <p>4: Work with the NSW DP&E to implement</p>	<ul style="list-style-type: none"> Action 4 is the only specific action related to provision of affordable rental housing, yet it contains no clear outputs, timeframes, indicators or other measures. The Draft Plan needs tangible actions and mechanisms (including timeframes and responsibilities) to ensure delivery of affordable rental housing at least to the minimum proposed target level of 5-10%.

	Affordable Rental Housing Targets (refer to Objective 11).	
Direction	A city of great places – Designing places for people	
	Liveability	LGNSW Comments
Metrics	<ul style="list-style-type: none"> Percentage of dwellings within walking distance of a local or strategic centre Percentage of dwellings within walking distance of open space 	<ul style="list-style-type: none"> The Draft Plan pays a lot of attention to future housing targets yet it is lacking in metrics or targets for liveability. The plan needs to include meaningful actions and targets beyond walking distance to centres and open space. Measurable liveability outcomes that could be used are proposed in a paper by SGS Economics, which introduces the idea of a “liveability dividend from growth” to ensure that while the quality and character of life might be different, overall it will be better, not worse, than before⁴.
Objectives	<p>12: Great places that bring people together</p> <p>13: Environmental heritage is conserved and enhanced</p>	<ul style="list-style-type: none"> Local government has an important role to play at the local level. Councils need to manage the impacts of additional growth on the liveability of their existing communities while at the same time meeting liveability expectations for vast new populations within their local areas. As the population increases significantly, negative externalities such as congestion and demand for at-capacity facilities need to be managed, planned for and properly funded. The challenge of ‘creating great places’, as discussed earlier in this submission, is that councils have limited funding mechanisms to meet this expectation.

4.3 Productivity

- LGNSW supports the emphasis on employment and jobs and the concept of the 30-minute city.
- The GSC should prioritise development of a policy framework and tools to enable councils to make informed decisions that will protect (where appropriate) and grow existing employment and urban services land, given the intense pressures many are under to rezone it for alternative land uses. For some Sydney councils, the pressure to convert existing employment lands for residential development is already high and is growing. There will need to be a commitment from the NSW Government as well as strong policy support from the GSC to assist councils in preserving this land (such as by mandating the provision of commercial and retail space in the District Plans).
- LGNSW acknowledges the public transport initiatives that are currently committed, but questions whether they are sufficient. It is concerning that some of the exhibited future public transport links are not yet committed and there are doubts about the

⁴ Fensham, P., *Ensuring a liveability dividend from growth: A new Urban Renewal Community Compact*, SGS Occasional Paper, June 2017

timeliness of likely delivery. There is a growing need to reduce car dependency and road congestion.

Specific comments on the Directions, Metrics, Objectives and Actions in *Chapter 5 Productivity* are provided in the table below.

	Productivity	LGNSW Comments
Direction	A well connected city – Developing a more accessible and walkable city	
Metrics	<ul style="list-style-type: none"> Percentage of dwellings located within 30 minutes by public transport of a 	<ul style="list-style-type: none"> LGNSW welcomes the parallel release of the Draft Greater Sydney region Plan with the <i>Draft Future Transport Strategy 2056</i> (the Transport Strategy) and supporting transport plans. LGNSW has made a separate detailed submission on the Transport Strategy.
	Productivity	LGNSW Comments
	metropolitan city centre/cluster <ul style="list-style-type: none"> Percentage of dwellings located within 30 minutes by public transport of a strategic centre 	<ul style="list-style-type: none"> LGNSW is strongly supportive of public transport within an overall integrated planning and land use context. Councils are essential partners in the planning and provision of services to support development in their local and district areas. Public transport in Sydney and other urban areas needs to be expanded rapidly to support projected growth. A fast, efficient commuter friendly public transport system is essential to the effective functioning of large and growing cities as evidenced in cities globally.
Objectives	<p>14: A metropolis of three cities – integrated land use and transport creates walkable and 30-minute cities</p> <p>15: The Eastern, GOP and Western Economic Corridors are better connected and more competitive</p> <p>16: Freight and logistics network is competitive and efficient</p> <p>17: Regional transport is integrated with land use</p>	<ul style="list-style-type: none"> Objective 14 - LGNSW supports the ‘three cities’ concept, which unlike previous metropolitan strategies, recognises and plans for the prospect of a second Sydney airport. However, the three cities framework hinges wholly on the delivery of this substantial infrastructure commitment and is heavily reliant on an untold effort of coordination, funding and commitment from all three spheres of government. Objective 16 - Local government acknowledges the importance of improving the efficiency of freight transport to improve productivity and support economic growth, but the needs of the freight industry must be balanced with the impacts on road and bridge infrastructure and the amenity concerns of local communities. More detail is provided in the LGNSW submission to the <i>Draft Future Transport Strategy 2056</i>.
Actions	<p>5: Collaborate to deliver the GOP vision (refer to Objective 15).</p> <p>6: Develop a growth infrastructure compact for GOP (refer to Objective 15).</p>	<ul style="list-style-type: none"> LGNSW supports the concept of Growth Infrastructure Compacts as a structured approach that enables local government to provide valuable local knowledge and practical expertise in the very early planning stages for these significant precinct developments.

Direction	Jobs and skills for the city – Creating the conditions for a stronger economy	
Metrics	Growth in jobs in targeted metropolitan and strategic centres Change in number of people employed locally(five yearly)	<ul style="list-style-type: none"> Realising job targets will be largely a factor of market forces. Job targets can be notional at best - any significant interventions to generate employment require economic levers and incentives which are outside the scope of local government and the GSC. Councils can provide for and facilitate employment by securing strategically placed employment and services land but they cannot make jobs appear. Actions will be needed by government to consolidate the hierarchy of centres and to assist with incentives to attract businesses.
Objectives	<p>18: Harbour CBD is stronger and more competitive</p> <p>19: Greater Parramatta is stronger and better connected</p>	<ul style="list-style-type: none"> Objective 23 – Local government appreciates that the Draft Plan acknowledges the need for industrial and urban services land to be planned for, protected and managed, including for waste management purposes. However this renders waste management an urban service, and not an essential service. The provision of garbage (waste) services is listed in the <i>Essential Services Act 1988</i> along with energy supply, public transportation,
	Productivity	LGNSW Comments
	<p>20: Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City</p> <p>21: Internationally competitive health, education, research and innovation precincts</p> <p>22: Investment and business activity in centres</p> <p>23: Industrial and urban services land is planned, protected and managed</p> <p>24: Economic sectors are targeted for success</p>	<p>public health services and water supply. Waste services and associated infrastructure should be prioritised in the Draft Plan accordingly, in Objectives 1 to 4 and 6.</p> <ul style="list-style-type: none"> The buffers proposed in the plan will not go far enough to allocate the necessary land and infrastructure required to service Sydney's waste management needs. At a minimum, adequate waste processing capacity, integrated transport planning and supporting infrastructure such as transfer stations, community recycling centres and sorting/reuse facilities need to be adequately planned for across Sydney. Sydney needs a strategically planned and integrated waste and recycling infrastructure network.

Actions	<p>7: Support the growth of the Camperdown-Ultimo Collaboration Area (refer to Objective 18).</p> <p>8: Collaborate to deliver the Western Sydney City Deal (refer to Objective 20).</p> <p>9: Facilitate the whole-of-government place-based outcomes through Collaboration Areas for targeted strategic centres, including Liverpool; Greater Penrith and Randwick (refer to Objective 22).</p> <p>10: Review industrial and urban services land in the Central River City and the South West and North West Priority Growth Areas (refer to Objective 23).</p>	<ul style="list-style-type: none"> • LGNSW supports a collaborative approach, but the difference between a Collaboration Area and a Growth Infrastructure Compact is unclear.
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4.4 Sustainability

- A collaborative and strategic approach is required to provide a clear vision for the Metropolitan Rural Area, so that site specific decisions will not result in a cumulative loss of the Metropolitan Rural Area across Greater Sydney. The GSC should work collaboratively with local government and the relevant state agencies to coordinate a holistic planning strategy for the Metropolitan Rural Area to avoid ad-hoc planning outcomes resulting from site specific planning proposals.
- With increased densities to accommodate Sydney's population increase, open space provision at a regional, district and local level will be more critical than ever before.

Specific comments on the Directions, Metrics, Objectives and Actions in *Chapter 6 Sustainability* are provided in the table below.

	Sustainability	LGNSW Comments
Direction	A city in its landscape – Valuing green spaces and landscape	
Metrics	Proportional increase in Greater Sydney covered by urban tree canopy	<ul style="list-style-type: none"> • As a measure, increasing urban tree canopy at a LGA level is good for benchmarking. However, local government's preference is to prevent loss of existing vegetation as a first priority, rather than just replacement of vegetation, given the biodiversity values of remnant vegetation.

<p>Objectives</p>	<p>25: The coast and waterways are protected and healthier</p> <p>26: A cool and green parkland city in the South Creek corridor</p> <p>27: Biodiversity is protected, urban bushland and remnant vegetation is enhanced</p> <p>28: Scenic and cultural landscapes are protected</p> <p>29: Environmental, social and economic values in rural areas are maintained and enhanced</p> <p>30: Urban tree canopy cover is increased</p> <p>31: Public open space is accessible protected and enhanced</p> <p>32: The Green Grid links parks, open spaces bushland and walking and cycling paths</p>	<ul style="list-style-type: none"> • LGNSW supports all the objectives proposed under this direction. • Reference to the SEPP (Sydney Drinking Water Catchment) 2011 will need to be updated as this is being included in the Environment SEPP (currently under development – see draft EIE on public exhibition until end January 2018). • Objective 27 – discussion text should include reference to the ‘Strategic Sustainability Plan for Western Sydney’ and related ‘Strategic Bio-certification of Priority Growth Areas’ process underway in western Sydney (impacting on 7 councils). This process will support the implementation of the new <i>Biodiversity Conservation Act 2016</i> through identifying areas for biodiversity offset, and areas for development. This process will be key to determining the future management and growth of western Sydney, and the biodiversity loss and offsets which form part of this plan. This needs to be referred to in the GSC Greater Sydney Region Plan. (Objective 28 also refers to enhancing remnants). • The GSC has a limited definition of green infrastructure excluding opportunistic plantings in urban settings such as green roofs and walls. • Strategy 29.1 (to “maintain or enhance the values of the metropolitan Rural Area”) could be worded more strongly to limit productive rural lands being lost to rural residential development. • Objective 31 - LGNSW welcomes acknowledgement that “access to high quality open space is becoming increasingly important as higher housing densities, more compact housing and changing work environments develop” (refer p 143). Land for additional public open space in established areas, to meet higher population growth is difficult to provide, given the high price of land. Councils are facing a funding gap with regard to important facilities like public open space.
<p>Direction</p>	<p>An efficient city – Using resources wisely</p>	
<p>Metrics</p>	<p>Number of precincts with low-carbon initiatives</p>	<ul style="list-style-type: none"> • Precincts are not a good measure of what is happening across Greater Sydney. This indicator is not specific enough to measure. For example, residential development already needs to meet BASIX targets - would that constitute a low-carbon measure for
	<p>Sustainability</p>	<p>LGNSW Comments</p>
		<p>the purpose of this metric?</p> <p>Key question:</p> <p>21 Will these low carbon initiatives only be measured for new precinct developments thereby missing a whole range of other development?</p>
<p>Objectives</p>	<p>33: A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change</p> <p>34: Energy and water flows are captured, used and re-used</p>	<ul style="list-style-type: none"> • LGNSW supports Objectives 33 and 34. • Objective 35 - Sydney’s waste management and supporting transportation infrastructure is under increasing pressure. While local government is the primary provider of waste services to the Sydney community, local government has limited control over waste infrastructure planning. It is vital that local government is brought to the table in planning for Sydney’s future waste

	35: More waste is re-used and recycled to support the development of a circular economy	infrastructure.
Direction	A resilient city – Adapting to a changing world	
Metrics	Number of local government areas undertaking resilience planning	<ul style="list-style-type: none"> • Councils have already undertaken climate change risk assessments and therefore some clarification on what is intended by the term 'resilience planning' would be beneficial. • The measure is too broad to be meaningful.
Objectives	<p>36: People and places adapt to climate change and future shocks and stresses</p> <p>37: Exposure to natural and urban hazards is reduced</p> <p>38: Heatwaves and extreme heat are managed</p>	<ul style="list-style-type: none"> • There are many vulnerable people choosing not to turn on air-conditioning and heating as they are cost-prohibitive for some households. LGNSW therefore recommends including a strategy around improving the resilience of homes through planning instruments, incentives, rating tools etc.
Actions	<p>11: Develop and implement the South Creek Corridor Plan (refer to Objective 26).</p> <p>12: Deliver the open space toolkit (refer to Objective 31).</p>	<ul style="list-style-type: none"> • Councils and relevant state agencies need guidance on appropriate minimum open space requirements in renewal areas. The open space toolkit is a welcome starting point to address the limited availability of both active and passive open space, particularly in established areas where densities are increasing significantly.

4.5 Implementation

- LGNSW welcomes funding of \$25 million to support councils to prepare local housing strategies and update their LEPs (p 54 and p162). However, equivalent funding should be made available to all councils, not be just limited to only 10 “priority councils” to be nominated by the GSC.
- Local government has statutory requirements to prepare Community Strategic Plans (under the *Local Government Act 1993*) and Local Strategic Planning Statements (under the *EP&A Act 1979*) to align with the District Plan. Councils may find it impossible to align their capital programs to meet the outcomes of both the community strategic planning process and overriding goals of the District Plan.
- Strategic decisions on local land use must be guided by the objectives/outcomes identified through the community strategic planning process.
- GSC should develop a structured framework to facilitate cooperation between the Commission, state agencies and councils so that actions and strategies can be delivered and the objectives of the Regional and District Plans can be achieved.

Specific comments on the Directions, Metrics, Objectives and Actions in *Chapter 8 Implementation* are provided in the table below.

	Implementation	LGNSW Comments
Objectives	<p>39: A collaborative approach to city planning</p> <p>40: Plans refined by monitoring and reporting</p>	<ul style="list-style-type: none"> Objective 39 appears to overlap with Objective 5 because the term ‘collaborative approach’ is being used for both. Objective 39 is more about the overall planning <i>framework</i> (including hierarchy/relationship of plans, roles and responsibilities, etc.). This objective would be better expressed as ‘<i>An agreed framework for city planning</i>’. Councils are required to update their LEP over a 2 to 3 year timeframe to give effect to the District Plan (refer p 162). Together with preparing their local housing strategies, (p 52-54) this will be resource-intensive period requiring additional funding support for all councils. The GSC must consult councils before any decisions are made about ‘prioritising’ funding support to councils for LEP updates. LGNSW welcomes recognition in the Draft Plan of the well-accepted community strategic planning (CSP) process which “provides detailed local considerations to be addressed in councils’ local environmental plans, operational plans and information management” (p 163). However, the recently amended EP&A Act now requires councils to prepare a Local Strategic Planning Statement (LSPS) which is to “explain how the council will give effect to regional and district plans in its local area, having regard to any community strategic plan under the Local Government Act 1993”.⁵ LGNSW supports Objective 40 (monitoring and reporting) although the detail on the monitoring and reporting framework is limited. Reporting every 5 years against the 10 Directions will be challenging, given that most of the objectives and strategies do not have measurable outputs. In their current form, many of these actions cannot be easily measured or reported against. This risks the plans being ineffective and progress/achievements being hard to monitor. <p><u>Key question:</u></p> <p>22 What will be the process and criteria used by the GSC to decide the “10 priority councils” and how will councils be consulted?</p>
	Implementation	LGNSW Comments
Actions	<p>13: Work with the NSW DP&E to develop its role in peer reviewing key land use and infrastructure plans prepared by NSW DP&E to provide assurance to the community that robust planning is being undertaken across</p>	<ul style="list-style-type: none"> LGNSW welcomes annual reporting on actions, although this is very limited, given there are only 14 Actions in the Draft Plan. <p><u>Key question:</u></p> <ul style="list-style-type: none"> What will be the output of Action 13? What is the timeframe?

⁵ Planning Legislation Updates – Bill Guide, January 2017, p 9

	<p>Greater Sydney consistent with the directions, priorities and objectives of the District and Region Plans (refer to Objective 39).</p> <p>14: Report on actions (refer to Objective 40).</p>	
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5. Conclusion

LGNSW supports the directions and objectives in the Draft Sydney Region Plan. However, the submission has sought to highlight areas of concern and identify areas where further detail is required. LGNSW has emphasised:

- the importance of GSC leadership to facilitate cross-agency collaboration;
- the critical need for NSW Government endorsement of the of a whole-of-government approach advocated by the GSC;
- the importance of the timely upfront delivery of infrastructure to support growth without compromising the objectives of productivity, liveability and sustainability;
- greater attention required on alternative funding mechanisms for infrastructure;
- the importance of local government as a partner in delivering the Sydney Region Plan; and
- the need for further development of plans and policy to facilitate implementation, (including value capture, protecting employment lands and affordable rental housing targets) and the need to include outputs, responsibilities and timeframes.

LGNSW looks forward to continuing engagement in the development and implementation of the Sydney Regional Plan.

If you have any questions about our submission, please contact Jane Partridge, Senior Policy Officer, Planning on 02 9242 4093 or email: jane.partridge@lgnsw.org.au.

ATTACHMENT 1

Extract from LGNSW Submission to the Draft District Plans (April 2017) Key/outstanding questions & recommendations

Key/outstanding questions:

- What mechanisms will be in place for councils, as lead agencies and partners, to have ongoing dialogue with the GSC on the implementation of District Plans?
- What is the role of the District Commissioners during implementation/delivery?
- What will the role of the District Commissioners be, beyond the development of the final District Plans?
- How are all the precinct plans being rationalised/managed/coordinated with the District Plans?
- Is the GSC sufficiently empowered to direct all relevant government agencies?
- Will the Medium Density Housing Code (i.e. the 'missing middle') and other SEPPs override what is in the District Plans?
- What forms of infrastructure will the Annual Infrastructure Priority List include? Will it address state as well as local infrastructure? Who will endorse it? What exactly will its role be? How will it be implemented?
- What action will be taken to capture value uplift?
- What is the process and timeframes for finalising the District Plans?
- How will the GSC involve elected councillors in finalising the plans? Will there be a formal request for input? Or a casual opening for councillors to 'have their say'?
- How were the housing growth targets determined?
- Will there be consequences in the case of failure to achieve development targets established by State Government?

Recommendations:

- 1) *GSC should clarify the role of District Commissioners in delivering the District Plans.*
- 2) *GSC should develop a structured framework to facilitate cooperation between the Commission, state agencies and councils so that the priorities and actions of the District Plans can be achieved.*
- 3) *GSC should clarify what formal mechanisms will be established through which councils will have ongoing dialogue and involvement with the GSC as the plans are delivered.*
- 4) *The GSC's implementation plan should form part of the final District Plans and must contain detailed actions, responsibilities and timeframes relevant to all agencies.*
- 5) *The NSW Government should empower the GSC to demand whole-of-government delivery and clarify the hierarchy and roles of other plans and instruments, as well as the responsibilities of their respective delivery/planning agencies.*
- 6) *The final District Plans will need to clarify what will be required of councils with regard to:*
 - *Aligning their CSP with the various levels of strategic land use plans;*
 - *Updating their LEPs; and*
 - *Preparing the proposed Local Strategic Planning Statements.*
- 7) *The draft District Plans should be amended to include assessment criteria for determining 'strategic merit'.*
- 8) *The draft District Plans should discourage proponent led planning proposals that are inconsistent*

with recently updated local planning strategies, unless it can be demonstrated that a proposal would provide a significant public benefit (other than simply providing more housing).

- 9) *The GSC should provide urgent clarification and direction on the funding mechanisms for local and district infrastructure, such as creating greater flexibility for section 94A contributions, and taking action to apply value capture as a funding mechanism as part of approval of any planning proposals/up-zoning associated with current urban renewal projects.*
- 10) *The GSC should clarify its intended consultation strategy for finalising the District Plans and 'A Plan for Growing Sydney', including the measures to be taken to consult with elected councillors.*
- 11) *The GSC should carefully consider the feedback from councils on the proposed redefined hierarchy for centres and consult with local government when developing the revised version of A Plan for Growing Sydney.*
- 12) *The GSC should review all of the actions in the draft plans and refine and tighten the wording so that they align with the priorities and can be easily measured and reported against.*
- 13) *As a matter of priority, the GSC should develop a policy framework and tools to enable councils to make informed decisions that will protect (where appropriate) and grow existing employment and urban services land.*
- 14) *The final District Plans should include meaningful actions and targets aimed at achieving great places – targets for liveability about the social, open space, public transport, education, health and employment needs required to support the forecasted population growth.*
- 15) *Councils should be afforded the opportunity to identify the preferred locations for medium density housing through their local planning strategies, rather than imposing a blanket medium density housing code.*
- 16) *The GSC must develop the 20 year housing targets in collaboration with councils, and clarify the assumptions and programs underpinning them.*
- 17) *The delivery of the housing targets should be staged to ensure they align with the delivery of upfront infrastructure by the NSW Government.*
- 18) *The GSC should work collaboratively with LGNSW, councils and the relevant state and housing bodies to develop an appropriate methodology and mechanisms for devising affordable housing targets and appropriate mechanisms that could be applied at a district and local level.*
- 19) *The GSC should:*
 - a) *work collaboratively with councils and OEH to develop water quality and ecosystem health criteria that are relevant to most stakeholders and are cost effective to measure; and*
 - b) *ensure ongoing technical analysis of combined monitoring results.*
- 20) *The GSC should work collaboratively with councils and relevant state agencies to undertake a regional scale assessment of biodiversity and identify threatened species and ecological communities to be protected, as well as identifying areas where other management tools (such as incentive programs, offsets, etc.) maybe appropriate.*
- 21) *The GSC should include consideration of funding mechanisms that councils can implement to achieve greater connectivity in the Green Grid, such as use of financial incentives for the delivery of connections or mandated minimum standards that are supported by mechanisms that councils can easily implement to achieve Green Grid connectivity.*
- 22) *The draft District Plans should be amended to include an action to identify partnership opportunities with other government agencies (such as the Department of Education and National Parks and Wildlife Services) to create new district open space.*

- 23) *The draft District Plans should be amended to include an action requiring regional road agencies to review their policies on street trees, with the aim of increasing opportunities to extend the urban canopy where feasible along these corridors.*
- 24) *The GSC should work collaboratively with LGNSW, councils and the relevant state agencies to coordinate a holistic planning strategy for the Metropolitan Rural Area to avoid ad-hoc planning outcomes resulting from site specific planning proposals.*
- 25) *The GSC must provide greater leadership with regard to waste infrastructure solutions, by ensuring that:*
- Waste management and supporting transportation infrastructure is strategically planned for through the district plans, providing adequate capacity, low impact transportation and improved recycling opportunity for all streams of waste for all of Sydney.*
 - The District Plans are amended to ensure strategic waste planning is carried out in collaboration with local government.*
 - The final District Plans make reference to the NSW Environment Protection Authority's 'Better Practice Guide for Waste Management in Multi-unit Dwellings'.*
- 26) *The GSC should replace the reference to C40 (Carbon Disclosure Protocol) requirements with the Global Protocol for Community-Scale Greenhouse Gas Emission Inventories.*
- 27) *The GSC should work collaboratively with LGNSW, councils and the relevant state agencies to reduce climate risks to the community through planning controls that consider appropriate design and material selection for a changing climate.*