

Submission on the Draft Metropolitan Strategy for Sydney to 2031

June 2013

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Executive Summary

Local Government has been and remains a strong supporter and essential partner in advancing the objectives of successive metropolitan plans and strategies for Sydney. Successful implementation of the *Draft Strategy* will depend on the development of Subregional Delivery Plans (SDPs) and Growth Infrastructure Plans (GIPs). However, Local Government NSW (LGNSW) considers that the framework and processes for subregional planning remain unclear. The *Draft Strategy* contains actions by the Department of Planning and Infrastructure (DP&I) to develop and undertake numerous related strategic reviews and plans, and LGNSW recommends that the framework for these plans be defined to show how they will integrate and interact with the subregional and growth infrastructure plans.

LGNSW is pleased the State Government refers to Local Government as a ‘partner’ rather than just a ‘stakeholder’ in the new planning system. However, based on the recent experience of some councils with the Urban Activation Precincts (UAP) program, we remain cautious about how this undertaking will be reflected in reality. For the partnership to work in the Sydney region, it is critical that the Department adopts a culture of early consultation with councils in all its undertakings.

LGNSW and its predecessors maintain that the *Metropolitan Strategy for Sydney* should exist within a wider State context, where the local and regional dimension to state development and population distribution is recognised. However, this State-wide context is notably absent from the *Draft Metropolitan Strategy to 2031*. LGNSW recommends that one of the new State Planning Policies should address the matter of regional development and population distribution across the State, reflecting a mix of policy initiatives or strategies for both Sydney and regional population growth.

The fundamental principles of sustainability, intergenerational equity, social justice, social inclusion and equitable access should underpin all of the delivery plans for the *Metropolitan Strategy* and should at least be given some acknowledgment in the opening sections of the *Draft Strategy*, where the long term vision for Sydney is unveiled.

The concept of “City Shapers” may have merit in focusing attention on certain strategic precincts within the region, but the delivery framework and timeframes for the long lists of “priorities” is not explained and unlike other actions in the *Draft Strategy*, there is a marked absence of leadership and responsibilities for their delivery.

Local Government is disappointed with the lack of consultation by the DP&I in redefining the subregions within the Sydney region. The definition of subregions must be agreed in partnership with councils, and housing targets for these agreed subregions should be linked with a subregional approach to identifying and funding infrastructure, open space and transport demands. The *Draft Strategy* intends the GIPs to be the key mechanism for coordinating infrastructure investment with initiatives to provide new housing, office and retail space and develop employment lands. However, the scope and timing of these plans is unclear. Local Government awaits further details about what mechanisms will be used to give these plans the ‘teeth’ to coordinate and direct agencies’ expenditure to meet land use demands.

LGNSW supports the continued use of UAPs to facilitate urban renewal, however, LGNSW insists that the UAP program as an example of a ‘partnership model’ between State and Local Governments must be reviewed in consultation with the participating councils, and actions taken to improve the program.

LGNSW supports targeting new jobs in Western Sydney, in recognition that more than half of Sydney's population will live in Western Sydney. Councils will be concerned to preserve and protect lands currently under pressure for rezoning that are likely to be required for industrial purposes in the future.

LGNSW is hopeful that the integration of infrastructure at regional and subregional levels in future will help address current urgent and critical gaps in strategic planning for environmental issues such as air quality, water resource management, protecting and improving biodiversity, and to plan for the effects of climate change. However, the success of strategic planning will be dependent on councils having the funding support and technical expertise to complete the necessary work. In addition, Local Government needs support through policy direction from the NSW Government, to provide clear guidance on planning for climate change related sea level rise.

LGNSW and its predecessors have previously acknowledged the urgent need for long term transport strategies both within Sydney and across NSW. For the foreseeable future, the vast majority of personal, work/business and freight related transport will continue to be road-based. From a Local Government perspective, this largely translates to councils' responsibility for the local and regional road network, which for many councils is their single largest item of expenditure. Rail is the most appropriate form of transport for mass/bulk products, and councils feel that rail transport must be explored as an alternative to road transport where practical. LGNSW acknowledges that effective local planning and the protection of key transport routes and corridors will be a very worthwhile initiative within the *Draft Metropolitan Strategy* and will guide appropriate investment in key local and regional freight links. However this must also include a committed and funded implementation plan to deliver these overarching strategies in a timely, consistent and financially sound manner.

LGNSW supports the objective of developing a hierarchy of transport corridors between Sydney and regional NSW, to more effectively support the economic development of both Sydney and regional areas of the state. There is also a need to protect corridors and sites for longer term transport needs, and therefore the *Draft Strategy* must include discussion on the future airport needs of Sydney including the demand for and location of a second Sydney Airport. The absence of any acknowledgement of a possible future second Sydney airport in the *Draft Strategy* is surprising and somewhat undermines the credibility of the long term plan for Sydney. LGNSW maintains that the *Draft Strategy* must recognise a second airport as potentially being a longer term option for Sydney and the opportunity should be preserved through the NSW Government's proposed new Land Release Policy.

Sydney's subregions will be the first to establish Subregional Planning Boards, which will be critical for development of the proposed subregional delivery plans. Given Local Government's key role, councils should have a role in defining their subregions. LGNSW urges the government to consider the mechanisms through which councils can be meaningfully involved in delivering the actions within the *Draft Strategy*. We recommend that suitable mechanisms and/or groups be established within the regional planning framework through which elected local members can be involved in decision making at the regional level. LGNSW also sees the existing positive working relationships between councils and DP&I regional offices as having the potential to advance this partnership.

LGNSW recommends that the delivery of the *Metropolitan Strategy* is managed by a program, funding and action plan, with a lead agency responsible for overseeing and keeping track of progress on the delivery of the actions. This would include maintaining communication and coordination across all agencies.

Planning for a sustainable Sydney requires more than the rewriting of targets for housing and jobs, the creation of new models for delivery or the merging of existing plans. It will require:

- A culture change in the NSW Government's approach to metropolitan and regional planning, characterised by new and innovative approaches to community participation.
- A strengthening of partnership arrangements between State and Local Government.
- A more integrated and coordinated approach by all levels of government to the planning and delivery of infrastructure and services.
- Agreement from councils in the region about the most appropriate breakdown into subregions.
- The establishment of Subregional Planning Boards for each subregion, along with the development of at least six Subregional Delivery Plans and Growth Infrastructure Plans all supported by appropriate levels of funding and resources.

Consideration of how some of Sydney's forecast population growth could be accommodated outside of the metropolitan region through policies and infrastructure provision that could generate and attract growth in regional locations.

1. Introduction

Local Government NSW (LGNSW) is the peak body for NSW Local Government, representing all the 152 NSW general-purpose councils, the special-purpose county councils and the NSW Aboriginal Land Council.

LGNSW thanks the NSW Minister for Planning for the invitation to make a submission in response to “*Metropolitan Strategy for Sydney to 2031*”.

Local Government has been and remains a strong supporter and essential partner in progressing the objectives of successive metropolitan plans and strategies for Sydney, the most recent being the *Metropolitan Plan for Sydney 2036* which was released in 2010. Local Government will continue to play an important role in the future planning of metropolitan Sydney by providing the local knowledge, experience and fine-grain planning and delivery mechanisms that are critical to meeting the challenges posed by a growing population.

LGNSW is pleased to provide a submission on the *Draft Metropolitan Strategy for Sydney to 2031*. In reviewing the *Draft Metropolitan Strategy for Sydney to 2031*, LGNSW has looked at this draft as the first example or ‘template’ of a Regional Growth Plan under the new planning system. Our submission contains some broad comments about the strengths and gaps in this draft document as the first of many Regional Growth Plans to be rolled out under the new planning system. Our submission generally follows the structure of the draft strategy.

2. General Comments

2.1 Integrating Subregional Delivery Plans with other Strategic Plans

LGNSW understands that the NSW Government intends the *Draft Metropolitan Strategy for Sydney to 2031* to be the first example or ‘template’ of a “Regional Growth Plan” under the proposed new planning system for NSW, and that it has therefore been drafted with a format and approach that will be used by all other Regional Growth Plans throughout the State¹.

There are 29 objectives, 101 policies and 118 actions (including 9 ‘City Shapers’ with a total of 67 priorities). The delivery tools, timing (short, medium or long term) and key responsibilities for the actions are identified in each chapter and for each of the six subregions. While the *Draft Strategy* has sought to identify the key activities and deliverables to achieve its 29 broad outcomes, the timeframe of these is somewhat arbitrary. The Department has advised that short term timing is 3 - 5 years, medium term timing is 5 - 10 years and long term timing is 10 - 20 years.

LGNSW understands that many will be dependent on the development of Subregional Delivery Plans (SDPs) and Growth Infrastructure Plans (GIPs) for its successful implementation. However, as discussed in section 8 of this submission, the framework and processes for subregional planning remain unclear and subject to debate. There is still much work to be done before any of the actions in the *Draft Metropolitan Strategy for Sydney to 2031* can be delivered. In addition to the SDPs and GIPs, the *Draft Strategy* contains commitments by the DP&I to develop and undertake numerous other strategic reviews and plans (e.g. a new Land Release Policy, Economic Development Plans, a Structure Plan for Western Sydney Employment Area, Employment Lands Development Program, and a Strategic Review of the

¹ *A New Planning System for NSW - White Paper, p 75*

Metropolitan Rural Area). There is potential for strategic plan ‘clutter’ and overlap unless the structure and scope of subregional delivery plans is clearly spelled out, and their relationship with other strategic planning documents is articulated. LGNSW recommends that the framework for these plans be defined to show how they will integrate and interact with the subregional and growth infrastructure plans. This framework must include an overall plan for consulting with the yet-to-be established Subregional Planning Boards, councils, communities and other stakeholders.

The *Draft Strategy* intends the Growth Infrastructure Plans to be the key mechanism for coordinating infrastructure investment with initiatives to provide new housing, office and retail space and develop employment lands. However, the scope and timing of these plans is unclear. Are they for regional, subregional or smaller precincts? Such plans will need to be prepared in consultation with councils, and their completion will be considerably dependent upon availability of resources with the department.

2.2 Local and State Government Partnership

LGNSW is pleased the State Government refers to Local Government as a ‘partner’ rather than just a ‘stakeholder’ in the new planning system. However, based on experience to date, Local Government remains cautious about how this undertaking will be reflected in reality. The Urban Activation Precincts (UAP) Program has been held up as a partnership between State and Local Government but from councils’ perspective the experience so far has not signaled a true partnership arrangement. This is discussed further in section 4.3.

The concept of a ‘partnership’ needs to be more than just words – it must be reflected in the processes and frameworks in the new planning system in order to become *embedded* in the new culture. The partnership culture must also be genuine and based on mutual respect of the rights and positions of both parties. For example, for the partnership to work, it is critical that the Department adopts a culture of early consultation with councils in all its undertakings, to ensure that relevant local information and issues are identified and considered in the delivery of the *Draft Strategy*.

2.3 Sustainable Population Growth and Whole of State Development

Over the past 20 years, NSW has witnessed growing disparities in employment, wealth, income and educational opportunities between and within regions in the State. The State’s existing development path is not adequately spreading the benefits of globalisation and the digital revolution across the State. The spatial impacts of the current economic development path are uneven, and the result is growing disparities in jobs, wealth, incomes, skills and learning opportunities between regions of the State and within regions. LGNSW and its predecessors maintain that the *Metropolitan Strategy for Sydney* should exist within a wider ‘Whole of State Development’ approach², where the local and regional dimension to State development and population distribution is recognised and emphasised in new policy directions.

While the *Draft Strategy* recognises that “economic growth in regional NSW is uneven and regional economies... can be less resilient to economic change” (p 47), this wider State

² For full details see ‘*A Framework for Whole of State Development*’
http://www.lgsa.org.au/sites/lgsa.org.au/files/imce-uploads/39/Framework_for_wholeofstate_development_final_291105.pdf

context is notably absent from the *Draft Strategy*. LGNSW and its predecessors hold the view that a mix of new policy initiatives or strategies which locate population growth outside of the Sydney Basin is needed as well as initiatives which accommodate accommodation growth within Sydney itself. We recommend that one of the new State Planning Policies needs to address the matter of regional development and population distribution across the State.

2.4 Planning Principles

Decisions in this *Metropolitan Strategy* will affect future generations who deserve to have their needs and expectations considered. However, there is limited discussion of the important principles of sustainability, intergenerational equity, social justice, social inclusion and equitable access in the *Draft Strategy*. These principles should underpin all of the delivery plans for the *Metropolitan Strategy*, and should at least be given some acknowledgment in the opening sections of the *Draft Strategy*, where the long term vision for Sydney is unveiled.

3. Balanced Growth

LGNSW understands that the Government's aim for "balanced growth" in Sydney is a claim to attract growth wherever the "market" demands it. In planning for balanced growth the *Draft Strategy* identifies four objectives:

- **Objective 1** Develop a New Land Release Policy and make new areas available for housing and jobs;
- **Objective 2** Strengthen and grow Sydney's centres;
- **Objective 3** Make Sydney connected; and
- **Objective 4** Deliver strategic outcomes - Nine city shapers.

Local Government will be a critical partner if these undertakings are to be successfully achieved. LGNSW urges the Government to consider the mechanisms through which councils can be meaningfully involved in delivering these actions. LGNSW sees the existing positive working relationships between councils and Department of Planning and Infrastructure (DP&I) Regional Offices as having the potential to advance this partnership. The Department's Regional Offices are already engaged with councils on a regular basis and have a good and practical understanding of the local issues.

In particular, LGNSW calls on the Department to ensure that councils are consulted from the early stages of the development of the new Land Release Policy proposed in Objective 1 (p 12) of the Strategy.

Councils have the difficult task of responding to the needs of their often diverse communities through their current community engagement strategies under the *Local Government Act 1993*. This responsibility will have increasing prominence under the Community Participation Charter proposed in the *Draft Planning Bill 2013*. In delivering its responsibilities under the *Draft Metropolitan Strategy*, Local Government will need to balance the community's expectations and changing needs whilst meeting wider State Government objectives, targets and plans. The *Draft Metropolitan Strategy* as a Regional Growth Plan has provided the long term framework for delivering the hard infrastructure (i.e. the "bricks and mortar") in the regional context. However, sustainable development in the region must balance economic, environmental *and* social considerations. Given the important and considerable role councils

have in planning for their communities, it is essential that the “soft/social” infrastructure³ is also considered and planned for earlier, i.e. as part of developing the Subregional Delivery Plans. It is therefore recommended that additional specific actions are included to raise the profile of social considerations in the strategic planning process. These are highlighted in italics and shaded below:

Objective 1 - Develop a new Land Release Policy and make new areas available for housing and jobs.

<i>Proposed New Action</i>	<i>Delivery Tool</i>	<i>Timing</i>	<i>Lead Agency</i>	<i>Other Key Partners</i>
<i>1.6 Identify existing social characteristics of an area and develop strategies to anticipate and meet the social needs of a changing and growing population</i>	<i>Subregional Delivery Plans</i> <i>Community Strategic Plan</i>	<i>Short term</i> <i>ongoing</i>	<i>DP&I,</i> <i>Councils</i>	<i>Agencies,</i> <i>councils, business</i> <i>and the</i> <i>community</i>

Objective 2 - Strengthen and grow Sydney’s Centres

<i>Proposed New Action</i>	<i>Delivery Tool</i>	<i>Timing</i>	<i>Lead Agency</i>	<i>Other Key Partners</i>
<i>2.7 Ensure supporting social infrastructure is planned or already available to meet communities needs as the centres grow</i>	<i>Growth Infrastructure plans</i> <i>Community Strategic Plans</i>	<i>Medium term</i> <i>Ongoing</i>	<i>DP&I,</i> <i>Councils</i>	<i>Agencies,</i> <i>councils, business</i> <i>and the</i> <i>community</i>

Ensuring that social, health, cultural and environmental wellbeing across diverse populations (especially hard to reach and/or vulnerable groups) are considered at all planning stages, but particularly upfront in strategic planning, would be an effective risk management strategy. Social impact assessment will be an important tool to consider the health, social and cultural needs of the population in subregional planning. The process of subregional planning will need to include mechanisms to identify the social needs of the existing and anticipated population and to embed these social and health impact assessments in Subregional Delivery Plans.

The *Draft Strategy* is silent on the provision of a second Sydney airport and instead focuses on improving connectivity between Sydney Airport, Port Botany, Strategic Centres and Specialised Precincts by upgrading the existing transit framework. In a draft strategic plan for a “global city” with a vision to be “the nation’s economic and financial powerhouse [and] attract

³ “Soft infrastructure” refers to the elements within the physical environment that facilitate and or contribute to the social, health, cultural and environmental wellbeing of the community

domestic and international business investment” (p 4), the absence of any acknowledgement of a possible future second Sydney airport is surprising and somewhat undermines the credibility of the long term plan for Sydney. Although government policy is currently ambiguous, a second Sydney airport has the capacity to be a significant ‘City Shaper’. LGNSW maintains that the *Draft Strategy* must recognise a second airport as potentially being a longer term option for Sydney, and that the opportunity should be preserved through the NSW Government’s proposed new Land Release Policy.

The concept of “City Shapers” under Objective 4 of the *Strategy* (pp. 18-27) may have merit in focusing attention on certain strategic precincts within the region. However, the long lists of priorities present somewhat of a ‘wish list’ of random goals. The delivery framework and timeframes for these priorities is not explained and unlike other actions in the *Draft Strategy* there is a marked absence of leadership and responsibilities for delivery. The role of Local Government in transforming the City Shapers should be acknowledged, particularly given the previous statements of commitment to a State and Local Government partnership.

Nine City Shapers – Priorities		
<p>Objective 4</p> <p>Deliver Strategic outcomes – nine city shapers – <u>in partnership with local government</u></p>	Priorities for Global Sydney - <u>in partnership with City of Sydney and relevant councils</u>	<p>a. Transform the city by delivering the priorities for each city shaper <u>and ensure appropriate maintenance measures are supported.</u></p> <p>b. <u>Ensure the social, health, environmental and cultural wellbeing of the priority areas are considered with the provision of appropriate green corridors, open space, accessibility and walkability for each city shaper.</u></p>
	Priorities for Global Economic Corridor <u>in partnership with City of Sydney and relevant councils</u>	
	Priorities for Sydney Harbour <u>in partnership with City of Sydney and relevant councils along Sydney Harbour</u>	
	Priorities for Parramatta <u>in partnership with relevant councils</u>	
	Priorities for Parramatta Road Corridor <u>in partnership with relevant councils</u>	
	Priorities for Anzac Parade Corridor <u>in partnership with relevant councils</u>	
	Priorities for North West Rail Link Corridor <u>in partnership with relevant councils</u>	
	Priorities for Western Sydney Employment Area <u>in partnership with relevant councils</u>	
	Priorities for Sydney’s Metropolitan Rural Area <u>in partnership with relevant councils</u>	

Most of the City Shapers (e.g. Parramatta, Parramatta Road Corridor, Anzac parade Corridor, and the North West Rail Link Corridor) involve priorities for urban renewal and housing provision which will necessitate consideration of not only the traditional roads, transport and utilities infrastructure, but also the social needs of the new community. LGNSW recommends that an important additional priority/action for each of the nine City Shapers therefore is to:

“Identify existing social characteristics of an area and develop strategies to anticipate and meet the social needs of the changing and growing population through carefully considered social and health impact assessments.”

In relation to the City Shapers, the following questions remain unanswered:

- What are the timeframes for all these “priorities” for the City Shapers?
- What funding is available, and who will be responsible for their delivery?
- How will their implementation be monitored, reported, regulated?
- Which State agency/agencies or portfolio will lead and champion the delivery of “priorities” for the City Shapers?
- Are all these priorities deliverable at the same time, given the considerable stretch on resources? More importantly, are any of them at cross-purposes? i.e. do they all complement one another, or are there conflicting goals?

4. A Liveable City – Housing, Health, Social and Cultural Considerations

The *Draft Strategy* identifies the following five objectives for housing Sydney’s growing population:

- **Objective 5** Deliver new housing to meet Sydney’s growth;
- **Objective 6** Deliver a mix of well-designed housing that meets the needs of Sydney’s population;
- **Objective 7** Deliver well designed and active centres that attract investment and growth;
- **Objective 8** Create socially inclusive places that promote social, cultural and recreational opportunities;
- **Objective 9** Deliver accessible and adaptable recreation and open space.

4.1 Housing Targets

Objective 3 of the *Draft Strategy* recognises the importance of good transport connections for both the State’s and the national economy, however, there is an underlying assumption that forecast population growth can and should be accommodated within the existing Sydney basin. It is disappointing that the long term forecasting for Sydney appears to have taken place in the absence of any whole of State population targets or strategies, or any consideration of having active strategies to divert growth into regional locations. As discussed in section 2.3 of this submission, LGNSW holds the view that a mix of new policy initiatives or strategies which locate population growth outside of the Sydney Basin is needed as well as initiatives which accommodate housing growth within Sydney itself.

Councils have been contributing their share of meeting Sydney’s future housing needs by integrating previous population, housing and employment targets for metropolitan planning into their Local Environmental Plans. While many existing areas may have the benefit of established infrastructure, this may be at or above capacity, and any housing increases may exacerbate the problem.

In relation to Objective 5, the proposal to remove minimum lot size regulations may be of concern for many councils. Minimum lot sizes provide a tool to assist councils to deliver their housing strategies in planned precincts rather than by having ad hoc dispersed development which can create unplanned demands on infrastructure.

Targets provide an understanding that additional housing is needed and needs to be planned for. However, LGNSW questions the methodology used to allocate housing targets to subregions. In the first instance, we note that housing targets are broken into subregions, but as discussed further in section 8.2 of this submission, Local Government is disappointed with the lack of consultation by the DP&I in redefining the subregions. Some of our member councils have questioned how the subregions were drawn up, and whether they need to be reviewed. There must be consensus with councils about the breakdown into subregions. Until the definition of subregions can be agreed in partnership with councils, this in turn raises doubt about the targets that are being applied to each subregion.

Setting housing targets is supported, provided the targets are evidence-based and linked to infrastructure capabilities and commitments. Having an open and transparent process will also help local councils communicate with their communities the need for more housing to accommodate a growing population.

Subregional housing targets should be linked with a subregional approach to identifying and funding infrastructure, open space and transport demands. The question that is yet to be fully answered or understood is how these will be integrated and delivered through the subregional delivery plan approach. While the concept the GIPs as the delivery tool is supported, Local Government awaits further details about what mechanisms will be used in the GIPs to give them the 'teeth' to coordinate and direct agencies' expenditure to meet land use demands. Local Government welcomes the opportunity to work in partnership with the NSW Government to develop the housing targets and address other issues such as housing affordability.

4.2 Affordable Housing

Local Government acknowledges the concerns about housing affordability in Sydney, however, in this policy area councils have limited capacity to make substantive improvements, and most councils do not have the resources to take on the additional responsibilities that would be required to deliver 'affordable housing' as a core responsibility. Councils need to be resourced and supported to be able to make a significant contribution in this policy area. LGNSW recognises that while councils are limited in their capacity to provide affordable housing, councils have a role at the local level to facilitate the delivery of affordable housing projects on the ground.

LGNSW recognises the need for Local Government to partner with the State Government in providing for a greater range of housing types and sizes, to meet community demand. Local Government supports the principle that housing needs to be able to be more diverse, adaptive to life cycle changes, the ageing population and rising costs. The greatest determinant of access to housing is cost, and evidence reveals that housing is becoming less and less affordable for wider sectors of the community. Greater consideration of how to provide housing opportunities for those on low to moderate incomes is needed if we are to provide rental and first home owners more choice in an increasingly diminishing market.

The *Draft Metropolitan Strategy* identifies the Subregional Delivery Plans and the Review of the Affordable Housing SEPP as the appropriate delivery tool. However LGNSW questions why councils are not identified under Action 6.2 as a key partner in the preparation of housing

strategies that provide for and identify local affordable housing opportunities. We recommend that these actions in the *Draft Strategy* should be revised to acknowledge Local Government as a legitimate partner with State Government in developing affordable housing strategies that are workable at a local level.

4.3 Urban Activation Precincts

Some councils have been disappointed with their experience with the UAP Program which was established in mid- 2012. This program has been presented by the NSW Government as a delivery tool that will enable the NSW Government to deliver housing growth ‘in partnership’ with Local Government. However, a recent survey undertaken by LGNSW has found that the program is falling short of councils’ expectations and that councils’ experience has been that they are not considered to be equal partners under the program.

The UAP program has the potential to provide value where a council has endorsed a vision and planning strategy for the redevelopment of an area or precinct. LGNSW therefore supports the continued use of UAPs to facilitate redevelopment in urban renewals, on the proviso that they are based on a partnership culture and model that applies:

- Early and meaningful engagement with councils, before a precinct is nominated and formally seeking and obtaining council support;
- A more collaborative approach to plan making between state and Local Government; and
- A more transparent community engagement process, developed in association with Local Government, which addresses local issues.

If the UAP the Program is to be held up as an example of a partnership model with councils, Local Government maintains that actions must be taken to develop a partnership culture and model to improve the program. This will be essential to establishing a partnership model for application in future joint undertakings.

4.4 Local Identity and “Liveable” Communities

It is widely acknowledged that councils are diverse and there is not a ‘one size fits all’ approach. LGNSW therefore recommends that some of the objectives in the *Draft Strategy* should be reworded to reflect the desire of communities to retain and respect their local distinctiveness and identity. LGNSW recommends that Objectives 8 and 9 be amended as follows:

- **Objective 8:** “Create socially inclusive places that promote social, cultural and recreational opportunities and reflect local distinctiveness and identity.”
- **Objective 9:** “Deliver accessible and adaptable recreation and open space that promotes regional/subregional and local distinctiveness and identity.”

LGNSW recommends a number of specific amendments to the *Draft Strategy* to include actions and policies focused on creating “liveable” communities and environments. These are shown in Attachment 1.

Chapter 4 of the *Draft Strategy* makes only cursory mention of health infrastructure however, health should be an important consideration alongside social planning to create a “liveable

city". It was highlighted by the DP&I in a recent *Metropolitan Strategy* forum that some guidance would assist in ensuring health was considered in the Regional Growth Plans. We expect that the NSW Ministry of Health, PCAL and other health & wellbeing-focused organisations will provide relevant evidence to define and include health considerations in the Draft Metropolitan Strategy. However, LGNSW would also like recommend the following definitions for health (and wellbeing) for the *Draft Metropolitan Strategy* and for subsequent Regional Growth Plan. Health can be defined using:

- 1) World Health Organisation definition of health: "Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity."
- 2) National Aboriginal Community Controlled Health Organisation (NACCHO) definition of health based on Aboriginal health: "Aboriginal health" means not just the physical well-being of an individual but refers to the social, emotional and cultural well-being of the whole Community in which each individual is able to achieve their full potential as a human being thereby bringing about the total well-being of their Community. It is a whole of life view and includes the cyclical concept of life-death-life.

5. Productivity and Prosperity – Economy and Employment

LGNSW notes there are eight economic and employment-related objectives identified in in the *Draft Strategy*:

- **Objective 10** Provide capacity for jobs growth and diversity across Sydney;
- **Objective 11** Support the land use requirements of industries with high potential;
- **Objective 12** Improve economic flows between Sydney and regional NSW;
- **Objective 13** Provide a well located supply of industrial lands;
- **Objective 14** Provide a good supply of office space;
- **Objective 15** Provide a good supply of retail space;
- **Objective 16** Achieve productivity outcomes through investment in critical and enabling infrastructure; and
- **Objective 17** Balance the development of mineral resources and construction materials with the protection of other land uses.

Every council seeks to boost their economy and have various policies and strategies at a local level to promote economic development /health – all are keen to have some sort of balance development that will bring economic prosperity and provide local employment for its community. LGNSW therefore strongly supports Objective 12 to "improve economic flows between Sydney and regional NSW" (p 47).

LGNSW notes that the *Draft Strategy* focuses on providing most jobs within strategic centres and specialised employment precincts, particularly within the 'Global Economic Corridor' (one of the 'City Shapers'). LGNSW supports creating jobs where the population is targeted, therefore we support the proposed target of 50% of the new jobs being provided in Western Sydney, in recognition that more than half of Sydney's population will live in Western Sydney.

Objectives 13 and 16 contain actions which commit to the preparation of GIPs for a number of precincts and urban areas. As discussed in section 2.1 of this submission, such plans will need

to be prepared in consultation with councils and their scope and timing needs further clarification. For example, in relation to the supply of industrial lands (Objective 13), the Employment Lands Development Program (ELDP) is a key program for managing the supply of Employment Lands for the Sydney Region and assisting associated infrastructure coordination. The program is necessary to secure long-term employment outcomes, but greater attention is needed to ensure that infrastructure investment is built into the planning phase of each land release area in the Growth Centres.

The concept of a Structure Plan for Western Sydney Employment (Action 13.4) sounds good in concept, but the timing and resourcing of such a plan, and its relationship with other strategic plans (such as the ELDP, SDPs and GIPs) is unclear. (Refer to our earlier discussion about integrating plans, in section 2.1 of this submission.)

In relation to mineral resources and construction materials in the Sydney Basin, the draft Strategy identifies the existence of “valuable mineral resources and construction materials”, and contains an objective to “balance the development of mineral resources and construction materials with the protection of other land uses” (Objective 17). We acknowledge that the NSW Government’s Strategic Regional Land Use Policy has introduced requirements at the exploration stage to ensure the impacts of mining and coal seam gas on water resources and agricultural activity are properly considered. We assume that the provisions of this Policy will apply within the Sydney metropolitan area. LGNSW supports the preparation of a cumulative impact assessment methodology (Action 17.1) and the requirement for Agricultural Impact Statements (Action 17.2) for all state significant mining and CSG proposals. However, we question the timing and resourcing of the preparation of a cumulative impact assessment methodology, and whether this is to be State-wide or only relevant to the Sydney basin?

Action 17.3 of the *Draft Strategy* identifies that a proposed Strategic Review of the Metropolitan Rural Area, to be undertaken by the DP&I, will address land use conflicts between resource development and other uses (including urban areas and high value agricultural and environmental areas) and develop a strategy to evaluate and manage those conflicts. LGNSW questions whether this Strategic Review will take a similar form to the Strategic Regional Land Use Plans prepared in 2012 for the Upper Hunter and New England North West regions. As discussed in section 2.1 of this submission, the integration of this strategic review with the SDP’s and GIPs requires clarity, to create synergies and avoid overlap. It will be critical that the Department consults with all relevant councils in its Strategic Review of the Metropolitan Rural Area to ensure that all relevant data and mapping about matters such as environmental conservation and flood maps, land use strategies and other strategic local issues are identified and considered.

Councils will be concerned to preserve and protect lands currently under pressure for rezoning that are likely to be required for industrial purposes in the future. LGNSW therefore supports the policy (under Objective 13) that proposals to rezone existing industrial lands must be consistent with the ‘Industrial Lands Strategic Assessment Checklist’. It will be critical to ensure that the provision of land to meet housing targets does not come at the expense of retaining appropriate reserves of future industrial/employment lands. We question how the checklist will be applied, and by whom, and whether this checklist alone is enough to protect such lands from likely proposals to rezone for future housing.

In relation to Objective 14 (and specifically, Action 4.2), we caution that the establishment of “competitively priced, premium grade office accommodation that could encourage global businesses to locate and expand in Sydney” should not be to the detriment of existing and

planned centres which are located close to transport hubs, services and supported by higher density housing. In addition it is recommended that Objective 14 be amended as follows:

Objective 14 - Provide a good supply of office space that is accessible to the diverse Sydney population.

6. The Environment

The following six environment-related objectives are identified in the *Draft Strategy*:

- **Objective 18** Use energy, water and resources efficiently;
- **Objective 19** Build resilience to natural hazards;
- **Objective 20** Minimise impacts of climate change in local communities;
- **Objective 21** Improve air quality;
- **Objective 22** Achieve a healthy water environment; and
- **Objective 23** Protect, enhance and rehabilitate our biodiversity.

Accelerated development in both greenfield and established areas to meet housing demand must not be at the cost of due consideration of environmental constraints. The impacts of climate change present a significant challenge for councils in ensuring the sustainability of their communities. Adding to this challenge is the population growth that is forecast for the subregions; increases in local population, housing and property stocks, service needs and energy usage will all intensify the consequence of these and other environmental impacts.

LGNSW therefore supports objectives in the *Draft Strategy* related to air quality, water resource management and protecting and improving biodiversity, and to plan for the effects of climate change. LGNSW is hopeful that the integration of infrastructure with a strong focus on regional and subregional planning will help address current urgent and critical gaps in strategic planning at a regional and state perspective e.g. providing funding for Flood Plain Risk Management, Biodiversity Management Plans, studies of natural hazards under changed climatic conditions such as extreme weather and bushfire. However, the success of strategic planning will be dependent on councils having the funding and the technical expertise to complete the mapping of environmental constraints such as flooding, within realistic time frames.

Objective 19 of the *Draft Strategy* raises the need to understand the implications of natural hazards on land use decisions and the impact of land use decisions on how natural hazards occur. It also acknowledges current inconsistencies in terms of approaches to land use and management of natural hazards, and indicates an intention to increase the number of flood risk management plans available as a way to improve our understanding. These goals are supported by Local Government but they cannot be achieved without increased resources including funding and technical assistance to Local Government.

LGNSW supports Objective 20, to minimise impacts of climate change in local communities, however, this objective must be reinforced, and Local Government must be supported by way of policy direction from the NSW Government. Following the removal of the NSW Sea Level Rise Benchmarks in 2012 councils lack clear guidance on planning for climate change related sea level rise. Clear guidance is required on matters such as sea level rise and increases in rainfall intensities, which must be factored into flood modelling if we are to plan for a resilient built environment that can adapt to a changing climate.

Action 20.1 to review the *Towards a Resilient Sydney* project must ensure planning guidelines are identified in the Subregional Delivery Plan to address sea level rise. Action 20.2 commits the DP&I to develop “Guidance” for resilient neighbourhood and building design. LGNSW questions the timing and form of this guidance and urges the Department to consult councils early, as some councils may already have this type of policy guidance in their local area.

Many councils have undertaken much work to address the issue of climate change. Planning for climate change needs to be flexible and allow for adaptive management. Councils will continue to update their climate change risk assessments as new knowledge becomes available such as further technical studies that increase knowledge for impact assessments e.g. improving models to assess flood and erosion hazard. Equally, the planning system and Regional Growth Plans such as the *Draft Metropolitan Strategy for Sydney to 2031* need to be able to respond to new knowledge as it becomes available.

7. Accessibility and Connectivity - Transport

Local Government recognises the importance of all forms of transport as vital components of the state’s economy as well as the day to day activities of all people. The provision of appropriate transport contributes not only to the long-term environmental and economic sustainability of our communities, but also provides vital access to those people in remote locations or in disadvantaged groups. Planning for the massive state-wide transport task presents huge challenges from at both strategic and financial levels, but is necessary to guide all levels of government, including Local Government, in their future investment, land use and settlement patterns.

7.1 Transport access and Urban Renewal

In relation to Objective 26, the draft Strategy notes that the first round of Urban Activation Precincts (UAPs) “have been selected for investment and urban renewal to integrate with transport services” (p 73). While the concept of the UAP program may provide a legitimate alternative to the preparation of a planning proposal, to fast track the amendment of a local environmental plan and secure funding for the infrastructure, as discussed earlier in this submission, some councils have reported disappointment with their experience with the UAP Program.

The *Draft Strategy* identifies that both the DP&I and councils will be the lead agencies in planning and delivering liveable centres around “planned stations” on the North and South West Rail Links and that delivery will be through Subregional Delivery Plans or Local Plans. However, it is unclear whether Subregional Planning Boards or councils will be tasked to rezone land around planned stations. Further detail is required to clarify this responsibility and also whether the rezoning will be timed in accordance with the delivery schedule in a Growth Infrastructure Plan. Placing the responsibility on councils will have potential cost, resource and timing implications.

7.2 Freight

The provision of appropriate road connectivity, freight infrastructure and other transport contributes not only to the long-term sustainability of our communities, but also provides vital access to basic goods and services for those people in remote locations or in disadvantaged groups. LGNSW has acknowledged the urgent need for long term transport strategies both within Sydney and across NSW, in the context of the Long-Term Transport Master plan, the

NSW Freight and Ports Strategy, and we reaffirm this in this submission on the *Draft Metropolitan Strategy for Sydney to 2031*.

For the foreseeable future, the vast majority of personal, work/business and freight related transport will continue to be road-based. From a Local Government perspective, this largely translates to councils' responsibility for the local and regional road network, which for most councils is their single largest item of expenditure.

In developing policies (under Objective 27) regarding freight and heavy vehicle access, including 'last-mile' connections in urban areas, councils must balance the economic benefits associated with this growing freight task, with the associated impacts on road and bridge infrastructure and the road safety and amenity concerns of their local communities. Economic benefits and efficiencies to the freight and logistics industries and their customers do not automatically flow through to councils in terms of increased revenue to address the impact of these vehicles on the roads themselves, without which many of these freight flows would not be possible.

Rail is the most appropriate form of transport for mass/bulk products, including for example the movement of containers to and from port facilities in or close to Sydney. There are therefore parts of the state including within the greater Sydney area where investment in new rail lines, intermodal terminals etc., prioritised for freight traffic, should be considered. Councils feel that rail transport must be explored as an alternative to road transport where practical. LGNSW also supports development of a North-South Inland rail freight line which would significantly reduce the road and rail freight task through Sydney.

7.3 Road and Transport Corridors

The identification of strategic road/transport corridors (Objective 28) provides useful guides to future funding needs but must be expanded to include key local roads, especially those identified for key transport access to new growth and land release areas or for strategic first and last mile connections in an integrated freight network. LGNSW acknowledges that effective local planning and the protection of key routes and corridors will be a very worthwhile initiative within the *Draft Strategy* and will guide appropriate investment in key local and regional freight links. However this must also include a committed and funded implementation plan to deliver these overarching strategies in a timely, consistent and financially sound manner. As discussed in section 2.1 of this submission, we assume that this funding commitment will be delivered through the GIPs.

In relation to Objective 28, one of the barriers to investment in transport infrastructure is the time and cost associated with identifying and acquiring land for new corridors. The *Draft Strategy* identifies both the DP&I and councils as lead agencies in using statutory plans to protect various corridors. LGNSW seeks confirmation as to what role a Subregional Planning Board will have in reserving land to protect regional corridors (e.g. North West Rail Link).

7.4 Promoting Regional Growth Areas

LGNSW supports the objective of developing a hierarchy of transport corridors between Sydney and regional NSW, to more effectively support the economic development of both Sydney and regional areas of the state. Such strategies could include enhanced road and rail connections, including projects aimed at improving the flow of freight within, through or around Sydney.

LGNSW and its predecessors have previously indicated concern with the absence of a commitment to the long term future of all regional passenger rail services outside the Newcastle – Sydney – Wollongong areas. A genuinely sustainable and equitable regional connectivity policy must therefore include appropriate passenger rail and coach services between Sydney and all areas of the state.

It is the policy of LGNSW that all residents of regional New South Wales should be afforded equitable access to ongoing and reliable air services, including to Sydney Airport. Objective 29 should therefore acknowledge the vital importance of this component of regional connectivity, particularly in the context of discussions about future airport needs of Sydney and the need to retain existing levels of regional access.

In relation to Objective 29, councils will have an ongoing responsibility to provide local information to assist in the planning process for the High Speed Rail Project, particularly where the alignment goes through or major interchanges have been identified in their jurisdiction. LGNSW recommends that councils should be identified as being a key partner in planning for a high speed rail corridor.

7.5 Second Sydney Airport

There is also a need to protect corridors and sites for long term transport needs. In this context, the *Draft Strategy* must include discussion on the future airport needs of Sydney including the demand for and location of a second Sydney Airport. The potential development of a second airport in the Sydney basin presents huge implications for future land release strategies, the potential requirements for land-side ground transport corridors, and access and congestion issues related to the existing airport and nearby Port Botany freight hubs. As previously stated in section 3 of this submission, LGNSW maintains that the *Draft Strategy* must recognise a second airport as potentially being a longer term option for Sydney.

7.6 Other Transport Issues

LGNSW holds policy positions strongly supportive of public transport within both urban and regional areas of the state and within an overall integrated planning and land use context.

Local Government strongly acknowledges the importance of sustainable transport options including the acknowledgement of cycling, walking and other sustainable transport options as vital components of the transport task. Councils are involved in the provision, funding and maintenance of sustainable transport infrastructure including bus stops, footpaths, cycle ways and parking spaces and require appropriate funding assistance to increase the non-car modal share of transport.

8. Subregions

8.1 Subregional Delivery Plans

LGNSW has questioned limiting the development of subregional delivery plans to only designated 'growth areas'. In the metropolitan region of Sydney, we understand that all subregions will ultimately have a subregional delivery plan, however, Local Government questions why in many areas of the State, SDPs should not be developed as a mechanism to promote growth and development. Country regional areas generally want to attract

development, while in metropolitan and coastal NSW the focus is generally more on containing or managing growth and development.

In addition to the issues of boundary definitions for subregions discussed in section 4 of this submission, a critical area that requires further clarification is the governance framework proposed for subregional planning. The *White Paper* is silent on how the regional and subregional plans will be developed, and the following questions remain unanswered:

- Who will do the work for the subregional planning boards?
- How will these boards be resourced and what ongoing resourcing commitment will be available?
- How will council staff in particular be involved?

It is hoped that the integration of infrastructure with a strong focus on regional and subregional planning will help address current urgent and critical gaps in strategic planning at a regional and state perspective e.g. providing funding for Flood Plain Risk Management, Biodiversity Management Plans, studies of natural hazards under changed climatic conditions such as extreme weather and bushfire.

Another area of concern is that Subregional Delivery Plans are proposed to directly zone land. This has the potential to be another example of the top down approach, and will have to rely heavily on gaining community consensus at the subregional level.

8.2 Regional and Sub-Regional Boundaries

As discussed in section 4 of this submission, some councils have questioned how the subregional boundaries have been defined for the Sydney region, and what criteria and process was used, including the involvement of councils in the region. Given Local Government's critical role in the development of SDPs and the requirement to work together on Subregional Planning Boards, councils should define their subregions. Subregional boundaries for land use planning need to be based on shared 'communities of interest' in terms of land use planning activities, not simply on geographic proximity. For this reason, we question the logic around defining the Central subregion, being split by Sydney Harbour which effectively divides it into two distinct 'communities of interest'. We also question whether the proposed Central Subregion, having 17 councils, is too large and potentially unwieldy to be effectively managed under one management Board.

8.3 Sub-Regional Boards - Governance Arrangements

LGNSW endorses the proposal in the *White Paper – A New Planning Sydney* (p 83) to allow each individual council within a subregion to be represented on the Subregional Planning Board. However, the governance model for how these boards will operate is unclear. For example, LGNSW questions:

- Who will do the work for the subregional planning boards?
- How are they resourced, what resourcing commitment will be available, and how will councils be involved?
- What actual powers will council representatives have on these boards and how will decisions be made?

The planning boards are to be:

“...new planning bodies that...will provide a partnership with state and local government. The Boards will partner with the public in the consideration of development alternatives and in deciding preferred solutions” (*White Paper*, p 51).

Sydney’s subregions will be the first to establish these Subregional Planning Boards, which will be critical for development of the proposed subregional delivery plans. However, given the NSW Government’s track record on metropolitan and regional planning to date, the lack of clarity about resourcing, governance and the considerable culture shift that will be required, it is difficult to be convinced about how this ambitious undertaking to “partner with the public” will be transformed and translated into actual, meaningful and deliverable subregional plans.

9. Delivering the Strategy

Throughout past metropolitan plans and strategies the State Government has set the parameters for meeting long term projected population growth and provided targets for creating jobs and housing. The difficult task of delivering on those targets in a sustainable way has been left to Local Government.

One of the major downfalls of regional plans in the past has been the failure of infrastructure planning and delivery to support growth goals and targets. Housing and employment targets were not matched by commitments by State Government agencies to deliver associated infrastructure and services. It is hoped that the new structure of the *Draft Metropolitan Strategy* and its proposal to use Growth Infrastructure Plans (which will integrate land use planning with infrastructure provision) will provide an improvement on previous Metropolitan Strategies to be able to deliver actions to meet its objectives and targets.

The *Draft Metropolitan Strategy* has broken Sydney into six subregions (down from ten under the current Metropolitan Strategy), to assist in delivering population, housing and employment growth targets. The six subregions have been determined based on the sharing of similar growth challenges and an assessment of population and economic catchments and vary from three to seventeen LGAs in size. However, some councils have questioned how the subregions were drawn up, and whether they need to be reviewed. LGNSW maintains that councils should have a say in defining their subregions, and more work is needed to refine the governance framework for the subregional planning boards.

LGNSW supports a metropolitan planning framework with a strong well-monitored delivery program that is subject to regular reporting. The successful delivery of the actions in the *Draft Metropolitan Strategy* will not only require the commitment of resources and stakeholder engagement, but also a high level of coordination between State agencies and across all spheres of government. LGNSW notes the establishment of the CEOs group as a mechanism for coordinating previously disparate priorities of different State agencies. If Local Government is to be a partner with the State Government LGNSW recommends that suitable mechanisms and/or groups be established within the regional planning framework through which elected local members can have ongoing dialogue and involvement with State agencies at the regional level.

The new delivery framework should also consider the important role of the Department’s regional offices in delivering actions identified in the *Draft Metropolitan Strategy*. Councils commonly report having good relations with DP&I regional offices. The DP&I regional staff have solid working relationships with council staff and a good understanding of the local issues

for each of the councils in their regions. LGNSW contends that the Department’s regional offices should be supported, appropriately resourced and given greater autonomy to develop supportive working relationships with Local Government and work in partnership with councils within a subregional framework.

LGNSW recommends that the delivery of the *Metropolitan Strategy* is managed by a program, funding and action plan, with a lead agency responsible for overseeing and keeping track of progress on the delivery of the actions. This would include maintaining communication and coordination across all agencies.

10. Conclusion

Planning for a sustainable Sydney requires more than the rewriting of targets for housing and jobs, the creation of new models for delivery or the merging of existing plans. It will require:

- A culture change in the NSW Government’s approach to metropolitan and regional planning, characterised by new and innovative approaches to community participation.
- A strengthening of partnership arrangements between State and Local Government.
- A more integrated and coordinated approach by all levels of government to the planning and delivery of infrastructure and services.
- Agreement from councils in the region about the most appropriate breakdown into subregions.
- The establishment of Subregional Planning Boards for each subregion, along with the development of at least six Subregional Delivery Plans and Growth Infrastructure Plans all supported by appropriate levels of funding and resources.

Consideration of how some of Sydney’s forecast population growth could be accommodated outside of the metropolitan region, by policies and infrastructure provision that could generate and attract growth in regional locations.

Key points have emphasised in this submission are:

Regional and subregional planning framework	<ul style="list-style-type: none"> • LGNSW considers that the framework and processes for subregional planning remain unclear. • LGNSW recommends that the framework for these plans be defined to show how they will integrate and interact with the subregional and growth infrastructure plans. • LGNSW questions how the subregional boundaries have been defined for the Sydney region, and what criteria and process was used, including the involvement of councils in the region. If Local Government is to be a true partner with State Government and to work together on Subregional Planning Boards, councils should define their subregions. • Further details are required in some areas, to clarify the respective responsibilities of councils and the proposed new Subregional Planning Boards.
State and local	<ul style="list-style-type: none"> • LGNSW is pleased the State Government is referring to Local Government

Government partnership	<p>as a 'partner' rather than just a 'stakeholder'. However the Department must adopt a culture of early consultation with councils in all its undertakings.</p> <ul style="list-style-type: none"> Some councils' experience to date (through the UAP program) has been that they are not considered to be equal partners. If the UAP Program is to be held up as an example of a partnership model with councils, LGNSW maintains that it must be improved and the culture and management within the DP&I must be changed. LGNSW urges the Government to consider the mechanisms through which councils can be meaningfully involved in delivering the actions within the <i>Draft Strategy</i>. LGNSW also sees the existing positive working relationships between councils and DP&I regional offices as having the potential to advance this partnership.
Metropolitan Strategy within a State-wide context	<ul style="list-style-type: none"> LGNSW recommends that one of the new State Planning Policies should address the matter of regional development and population distribution across the State, reflecting a mix of policy initiatives or strategies for both Sydney and regional population growth. The current metropolitan planning framework fails to place Sydney's future growth in the context of the development of the adjoining regions and the rest of the State. This long term forecasting for Sydney appears to be occurring in the absence of any whole-of-State population targets or strategies, such as a decentralisation strategy.
Growth Infrastructure Plans	<ul style="list-style-type: none"> While Local Government largely is progressing towards the housing and employment targets set in the <i>Metropolitan Strategy 2005</i>, there has been limited commitment by the State agencies to the metropolitan planning framework. It is hoped that the new structure of the draft Metropolitan Strategy and the proposed use of Growth Infrastructure Plans will provide better integration and coordination in planning between levels of Government as well as between agencies within the State Government.
Environment-related objectives and technical resources	<ul style="list-style-type: none"> LGNSW is hopeful that the integration of infrastructure at regional and subregional levels in future will help address current urgent and critical gaps in strategic planning for environmental issues such as air quality, water resource management, protecting and improving biodiversity. However, the success of strategic planning will be dependent on councils having the funding and the technical expertise to complete the mapping of environmental constraints such as flooding, within realistic time frames.
Urban Activation Precincts (UAPs)	<ul style="list-style-type: none"> LGNSW supports the continued use of UAPs to facilitate urban renewal, on the proviso that they are based on a partnership culture and improved model. We recommend that the UAP program must be reviewed in consultation with the participating councils, and actions taken to improve the program.
Second Sydney Airport	<ul style="list-style-type: none"> The absence of any acknowledgement of a possible future second Sydney airport in the <i>Draft Strategy</i> is surprising and somewhat undermines the credibility of the long term plan for Sydney. LGNSW maintains that the <i>Draft Strategy</i> must recognise a second airport as potentially being a longer term option for Sydney and the opportunity should be preserved through the NSW Government's proposed new Land Release Policy.
Implementation	<ul style="list-style-type: none"> LGNSW recommends that the delivery of the <i>Metropolitan Strategy</i> is

and delivery	managed by a program, funding and action plan, and that a single agency be empowered to oversee and keep track of progress on the delivery of the actions.
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ATTACHMENT 1

Proposed amendments to Actions in Chapter 4 “A Liveable City” (Reference Section 4.4 of this Submission)

The following specific additions, shaded grey and highlighted in italics, are recommended in Chapter 4 of the *Draft Strategy*, to include actions and policies focused on creating “liveable” communities and environments.

Chapter 4 – A Liveable City

	Action	Delivery Tool	Timing	Lead Agency	Other Key Partners	Policy
<p>Objective 5</p> <p>Deliver new housing to meet Sydney’s growth</p>	<p><i>Include targets from liveable housing design guidelines in the planning of new housing and in both infill and greenfield areas & include measures of liveability and wellbeing</i></p>	<p><i>Regional Growth Plan</i></p> <p><i>Subregional Delivery Plan</i></p>	<p><i>Short term</i></p>	<p><i>DP&I</i></p>	<p><i>Housing NSW, Urban GrowthNSW, councils, business and the community</i></p>	<p>a. We will plan for at least 273,000 additional homes by 2021 and 545,000 by 2031 and set minimum housing targets for each subregion.</p> <p>b. New housing will be encouraged in areas close to existing and planned infrastructure in both infill and greenfield areas.</p> <p>c. New Urban Activation Precincts will be facilitated and expedited around existing and planned public transport and infrastructure.</p> <p>d. Infrastructure (<i>social and physical</i>) will be delivered to support housing growth.</p> <p>e. The supply of housing in established urban areas and zoned release areas will be fast-tracked.</p>
<p>Objective 6</p>	<p><i>Include targets from liveable housing</i></p>	<p><i>Subregional</i></p>	<p><i>Short term</i></p>	<p><i>DP&I</i></p>	<p><i>Housing NSW, councils, business</i></p>	<p>a. We will plan for a range of housing</p>

	Action	Delivery Tool	Timing	Lead Agency	Other Key Partners	Policy
Deliver a mix of well-designed housing that meets the needs of Sydney's population	<u>design guidelines in the planning of new housing and in both infill and greenfield areas (50% of all new housing to meet silver level standard by 2015)</u>	<u>Delivery Plans</u> <u>Community Strategic Plans</u>			<u>and the community, community housing providers</u>	types in Sydney to meet demand. b. Affordable <u>and social</u> housing for a mix of very low, low and moderate income earners will be provided across Sydney.
Objective 7 Deliver well-designed and active centres that attract investment and growth	<u>7.5 Work with local councils to continue to build and activate a sense of community and to reflect the local community's values by enabling place makers.</u>	<u>Subregional Delivery Plans</u> <u>Local Plans</u> <u>Community Strategic Plans</u>	<u>Short term</u> <u>Ongoing</u> <u>Short term</u>	<u>DP&I</u> <u>Councils</u>	<u>Agencies, councils, businesses and the community</u>	a. Existing centres will grow and change and new centres will be supported. b. Retail, employment, cultural and social infrastructure will be included in centres undergoing growth and renewal. c. The protection and use of heritage assets will be planned for upfront in urban renewal or establishing new centres. d. New centres will follow principles of good urban design.