



Sydney Metropolitan Strategy Greens NSW Submission

28 June 2013

Thank you for this opportunity to make a submission in response to the Sydney Metropolitan Strategy.

We understand that the Sydney Metropolitan Strategy will be the Regional Growth Plan for Sydney. Many claims are made in the White Paper about the high standard of consultation that will occur for Regional Growth Plans. If the consultation that has occurred for the Sydney Metropolitan Strategy is the benchmark for how such consultation will occur, this falls far short of the promises made by the Government on community consultation.

That the Sydney Metropolitan Strategy continued to be progressed even while the review of planning was still being completed is a cause for concern. In addition, submissions on this strategy are due to the same day as those for the White Paper meaning that most individuals and community groups will be substantially overwhelmed trying to provide submissions in time.

Unfortunately despite many promises to the contrary, the Sydney Metropolitan Strategy is marked by the same lack of consultation and failure to fund infrastructure that saw Labor's 2005 and 2010 metro strategies fail.

There are a number of principles that should be considered in any growth plans that are not adequately canvassed in the Sydney Metropolitan Strategy. These include: habitat protection, food security, the maintenance and provision of wildlife corridors and the legitimate community interest in retaining the existing character and charm of their localities. These appear to have been deprioritised compared to the focus on identifying for developers where more houses can be built, and providing some minimal associated infrastructure planning.

Thank you for considering this submission.

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David Shoebridge
Greens NSW Planning spokesperson



A. Vision for Sydney in 2031

The Greens NSW have a vision for Sydney that is more than just high rise tower blocks and economic activity. We see the 2013 Sydney Metropolitan Strategy as a chance to move towards a liveable, low carbon, prosperous and sustainable city that is the envy of the world not just for its beautiful natural setting but also for the built environment and economic and social structures that its residents have created.

B. Executive Summary

The Greens NSW support good strategic planning that aims to preserve what is precious, encourage what is good and ensure that, where there is insufficient information to hand, the precautionary principle guides decision making.

Unfortunately the Draft Metropolitan Strategy for Sydney will not deliver this. The delivery of the strategy along with the Long Term Transport Master Plan and State Infrastructure Strategy is supported in principle, however these plans must work together to allow for sustainable and appropriately integrated planning.

The key focus identified for the Metropolitan Strategy for Sydney is achieving growth. It should be noted that with increasing populations in NSW, growth is something that will be achieved regardless of what strategy is adopted; the key is to ensure that such growth is ecologically sustainable, creates the kinds of communities that promote health and community interaction, are well supported by infrastructure including public transport and allow for the creation of jobs.

The strategy refers to achieving growth through “strong cross-agency and private sector collaboration” but only with “cooperation with local government”. This turn of phrase suggests a continued strategy of underwriting private sector risk through public private partnerships whilst strongarming local councils into enforcing state and regional plans in their local area.

In the eyes of the Greens NSW and the many community groups we work with, this strategy gives excessive power to property developers and the “market” and insufficient weight to democratic and accountable local councils.



C. Balanced Growth

OBJECTIVE 1: Develop a new Land Release Policy and make new areas available for housing and jobs

The Sydney Metropolitan Strategy's growth plan amounts to the imposition of hundreds of thousands of new homes and hectares of high-rise development on local communities across Sydney, without ever speaking to local residents or putting aside any funds to meet essential infrastructure. It is agreed that plans should be made for the growth of Sydney and surrounds, but plans without clear financial planning or committed funds for infrastructure will not produce a coherent vision.

The Greens oppose the focus in the Strategy on market driven urban sprawl on the fringes of Sydney. Rather than endless urban sprawl we would propose the Strategy change its focus to supporting sensible infill development in existing localities, accompanied by the infrastructure required to support increasing densities.

This means more public transport, better protected and improved public open space and the retention of 'main streets' as community hubs, rather than endless urban sprawl. A smart regional plan would focus this in-fill development on land that is no longer needed for warehousing, industry or other defunct uses.

We can redevelop these areas with high densities without covering them with high rise towers. We know this because according to the 2011 ABS census some of the most desirable and liveable residential areas also have the highest densities and few, if any, high rise tower blocks.

Newtown ranks as the 17th most densely populated suburb in Australia with more than 9,000 people per square km, while Bondi ranks 9th with a density of more than 11,000 and people per square km and Darlinghurst fits more than 10,000 people in less than one square kilometre.

Even in regional cities and centres such as Newcastle, the most densely populated, desirable and liveable areas are also free of tower blocks. In that city Cooks Hill has a density 4,720 people per square km and Hamilton South fits 3,362 people per square km.

To achieve these densities, without destroying our city, we need to learn the best lessons of the past and match them with the brightest technologies of the 21st century. Much of the



development in NSW in the late 19th and earlier 20th centuries produced beautiful, liveable and walkable suburbs that we now greatly prize. These Victorian terraces and garden suburbs were designed to be low energy and low impact developments with active local shopping precincts and main streets that generated local jobs and economic activity. This style of development, and controls that promote it, should be at the centre of any new Metropolitan Strategy.

The draft Strategy misses a real opportunity to facilitate local energy production using both solar and wind, energy efficiency, recycling and reusing urban water to build smarter, not bigger, new housing. The Metropolitan strategy should look to some of the innovative co-operative housing models in North America and Europe and see how community driven projects can develop medium density housing that is community owned with active open space and community owned energy infrastructure. Sadly none of this innovative thinking is found in the draft Strategy.

Stopping the sprawl also ensures that precious farmland and bushland can be preserved, protecting our future biodiversity and food production. This is particularly important in Sydney where much of our remaining highly productive market garden areas face extinction unless we place hard and fast boundaries on the edge of urban sprawl.

Achieving such a vision requires best practice planning controls – developed with local communities, town planners, ecological consultants and health policy experts – and the consistent application of these controls. “Flexibility” sounds good as a concept, but when you realise that the main driver for most development in NSW is profit, flexibility means cutting back on social benefits, reducing open space and minimising expense. This is the trap that the draft Strategy falls into.

The draft Strategy claims that balanced growth requires consideration of where growth should be encouraged in future, yet despite this the Urban Activation Precincts were announced without substantial consultation with councils or local communities, and will be effectively imposed from above.

Genuine consultation cannot involve coming to the table with a finalised proposal and only allowing people to comment on it. Proper consultation requires the co-development of strategies and proposals, with the community and councils given a real say over the direction that will be taken.



The repeated references to allowing the market to determine where new development will occur will lead to undesirable outcomes where property developers pursue the most lucrative developments, rather than the most needed developments for the community.

OBJECTIVE 2: Strengthen and grow Sydney's centres

In general the Greens support plan making that allows a balanced approach to development across Sydney, with relevant infrastructure and an employment focus as key parts of this.

But any new development, if it is to serve the people of NSW long into the future, must be done within a broader framework of ecological sustainable development and community consultation.

It is remarkable that in a Metropolitan Strategy that, at least on its face is seeking to address the chronic housing costs and shortages in Sydney, no mention is made of affordable housing targets in any plans for housing growth. This is a substantial oversight and will inevitably lead to more people in Sydney being subject to housing stress.

The identification of Strategic Centres for planning is a useful way to understand areas in which development may reasonably intensify. What the plans means by "encouraging growth" in these areas is, however, unclear.

Rather than simply declaring these areas at a high end strategic planning level, these areas should only be designated following ground-truthing and community consultation. This has not occurred in the draft Strategy and will produce poor community acceptance.

It is considered likely that intense development in the Strategic Centres identified in the draft Strategy will also mean either exemptions from certain planning laws, tax breaks for developers or other government handouts. These exemptions and concessions, and the process that identified the Strategic Centres are both equally objectionable and are not supported.

OBJECTIVE 3: Make Sydney connected

In general the focus on urban renewal and density increases in transport hubs with adequate infrastructure is supported and something the Greens have long argued should be central to planning policy. This density however must not come at the loss of existing urban character. It must be focussed on in-fill development on land that is no longer needed for warehousing, industry or other defunct uses.



Creating a web of transit connections is a goal that the Greens support. In a state the size of NSW, moving away from reliance on the CBD hub and creating additional transport hubs across the state is a positive move.

However, without substantial commitments to additional funding over the long term these plans will not be realised.

OBJECTIVE 4: Deliver strategic outcomes - nine city shapers

Global Sydney

The focus on the Sydney CBD area, which represents over a third of the financial activity in the state, is sensible.

The strategy's goal to "bring forward redevelopment at Barangaroo" is of serious concern. The Barangaroo process has been rushed when it suited the Government and developers, with limited community consultation and a consistent disregard for environmental concerns.

Given the extraordinary opportunity this site represents for Sydney this redevelopment must be carried out to the highest possible standards, and be subject to the most rigorous controls to make sure that it is done right. Instead the Draft Strategy appears content for this most significant project in Sydney to continue under the lax, broken and discredited Part 3A planning process inherited from Labor. This is not good enough.

We also have concerns about the identified investment opportunities in Darling Harbour, particularly as these relate to further construction in this area. These concerns primarily relate to the loss of public open space as a result of the development and the increasing density in the area without substantial additional provision of services. The concerns also include what appears to be the needless replacement, at very high environmental and economic cost, of recently built facilities including the convention centre.

From a Greens NSW perspective, future prosperity requires that any development of this land enhances connections with surrounding suburbs, rather than dividing communities, and does not cause a loss of amenity (light, views, access) for existing residents and retailers.

On past precedent it is clear that the most timely, sustainable and valued developments in the Sydney CBD are obtained when the approval body is the democratically elected and



competent City of Sydney and not the unelected, and bureaucratic, Department of Planning. The Metropolitan Strategy should be amended to make this clear.

Global Economic Corridor

Insofar as this corridor relies on the continued function of Sydney Airport in its current form it does not go far enough. The continued operation of an international airport with its associated noise and pollution impacts on densely populated suburbs is clearly unsustainable.

Urgent consideration must be given to the development of an alternative airport, in an area well served by high speed rail and other public transport and in a less populous area. This would allow the transition away from the most impacting flight movements at Sydney Airport, and open up enormous new opportunities for development in the areas around the existing airport.

Sydney Harbour

We support strategies that will develop long-term options for expanding cruise ship terminal space but these must be developed in consultation with local communities and their councils. The Greens NSW have been active in relation to existing proposals for a proposed White Bay Cruise Ship Terminal and entertainment precinct and do not support the expansion of these facilities on the Western side of White Bay.

Given the surges of traffic associated with cruise ship embarkation and disembarkation any new or expanded cruise ship facilities should wherever possible have direct pedestrian access to the CBD.

Parramatta

There are very substantial concerns that the Metro strategy will lead to development that destroys the existing heritage fabric of Parramatta. Parramatta is unique as the site of Old Government House and some of the richest colonial and aboriginal heritage in Sydney. To protect these assets, the Metropolitan Strategy must ensure that any new construction respects and enhances these heritage values.

As presently drafted the Strategy is a real threat to some of the key features of Parramatta around which its growth as a distinct and valued CBD for Western Sydney should be based.



The Greens support a plan to promote jobs and sensitive development in Parramatta, but this needs to be done to enhance its heritage values and build a distinct Western Sydney CBD, not just a bland replica of the soulless commercial towers that were constructed in the 1970s to 1990s in places such as North Sydney.

To encourage the most timely, sustainable and valued developments in Parramatta the Greens support a regime that sees the principal approval body be the democratically elected and competent Parramatta City Council and not the unelected, and bureaucratic, Department of Planning. The Metropolitan Strategy should be amended to make this clear.

Anzac Parade Corridor

The move towards light rail between the CBD and the hubs of Randwick, Kingsford and out to La Perouse and Maroubra is supported – assuming that adequate funding is provided to develop this strategy.

However this light rail infrastructure must be situated so that it is a genuine commuter link between transport hubs, existing and emerging residential areas and consistent activity centres such as main streets and local shopping precincts. There is a concern that the chosen route places excessive emphasis on servicing venues such as the University of NSW and Randwick Racecourse that will have short periods of intense activity and long periods of low patronage. The Greens would urge closer consideration be given to the light rail route to ensure it is more than just a peak service for these existing activity centres.

The Urban Activation Precincts at Randwick and Anzac Parade, like all the other UAPs, were announced without any meaningful consultation with councils or local communities, and will be effectively imposed from above. Once again consultation has been reduced to holding a few meetings, rather than genuinely developing strategies with affected communities.

In this area the plan for “a network of green corridors and open space to enhance local amenity” is supported, the main question is why this is not a goal for all plans under this strategy. It should also be noted that the area around Anzac Parade already benefits from Centennial Park and Queens Park and as such is already far better supplied with green open space than many areas in Metropolitan Sydney.

To encourage the most timely, sustainable and valued developments in Randwick the Greens support a regime that sees the principal approval body be the democratically



elected and competent Randwick Council and not the unelected, and bureaucratic, Department of Planning. The Metropolitan Strategy should be amended to make this clear.

North West Rail Link Corridor

The delivery of the North West Rail Link is well overdue. It is imperative that this system is fully integrated into the rest of the system and carry standard rolling stock. The failure to do so will generate a stand-alone shuttle service rather than a genuine expansion of the network.

It is clear that the development of these corridors for public transport must be prioritised over plans for new motorways which will inevitable end up congested within a few years.

We also note ongoing concerns about the Urban Activation Precinct at Epping including the lack of consultation before the precinct was announced, and the likely detrimental impact that shoehorning large numbers of new residential and commercial premises into this area will have considering the lack of additional infrastructure provision.

To encourage the most timely, sustainable and valued developments in Epping the Greens support a regime that sees the principal approval body be the democratically elected and competent Hornsby Shire Council and not the unelected, and bureaucratic, Department of Planning. The Metropolitan Strategy should be amended to make this clear.

Western Sydney Employment Area

Western Sydney currently has many households who face the combined pressures of housing stress and poor and unreliable public transport. Creating more housing and jobs are positive steps, but they cannot simply be directed by the market, they must follow the best evidence to address the specific challenges currently existing in this area.

The Western Sydney Employment Area is at the intersection of the M7 and M4 Motorways but long term growth of this area will require substantial development of both active transport links like cycleways and public transport to major centres and the surrounding area.

The Sydney Metropolitan Strategy identifies a number of projects for investigation in the area, including “opportunities to improve transport connections to the area” and “opportunities for better connections with surrounding centres” both of which would require the commitment of substantial funding to become a reality. Considered alone, plans to investigate options will not improve the quality of life of those living in Western Sydney.



To the extent that Western Sydney will be developed as an employment area, then the key decisions on what areas are to be redeveloped, and what areas are to be protected, should be made by the democratically elected and competent Councils in Western Sydney and not the Department of Planning.

In addition there must be clear state-mandated protection of endangered Cumberland Woodland and vital wildlife corridors throughout Western Sydney. The Metropolitan Strategy should be amended to make this clear.

Sydney's Metropolitan Rural Area

The growth of established rural towns and villages as a goal would tend to suggest the imposition on some rural communities of additional development beyond what would currently be allowed or desirable.

The primary objectives of this "city shaper" must be the protection of precious agricultural land and ecological values. To deliver this, clear protections should be inserted in the Metropolitan Strategy to protect existing productive agricultural land in order to maintain as much localised food production in the Cumberland basin as is possible.

The idea that it would be appropriate, as the Strategy suggests, to "balance the development of mineral resources and construction materials with the protection of other land uses" is fanciful at best, considering the substantial conflicts between extractive industries and most other land uses. This element in the Strategy should be abandoned and an unambiguous prohibition on CSG exploration or extraction should be included.

By contrast the move to encourage renewable investment opportunities is long overdue and strongly supported.

D. A liveable city

Liveability of cities is something best determined by communities, not developers. On this basic measure the Government's Draft Strategy has some serious shortcomings.

Objective 5: Deliver new housing to meet Sydney's growth

Arbitrary growth targets based on internal modelling by the Department of Planning should not be used in isolation to "deliver new housing". The underlying assumption that the way to build confidence in the housing market in NSW is to get rid of environmental and other controls is simply wrong. In fact, the degrading of existing suburbs in the pursuit of



development could even mean a threat to the profitability of the development, as well as to existing property prices.

As noted above density, liveability, sustainability and affordability are not competing goals. In fact in a well-designed planning system these goals can work together to produce desirable and densely settled suburbs that encourage public transport and a low carbon future. This kind of planning vision should be a key part of the housing targets, not simply a number on a page.

Objective 6: Deliver a mix of well-designed housing that meets the needs of Sydney's population

The strategy claims that balanced growth requires consideration of where growth should be encouraged in future, yet despite this the Urban Activation Precincts were announced without substantial consultation with councils or local communities, and will be effectively imposed from above.

Genuine consultation cannot involve coming to the table with a finalised proposal and only allowing people to comment on it before it is rubber stamped. Proper consultation requires the co-development of strategies and proposals, with the community and councils being given a real say over the direction that will be taken.

The Strategy also identifies that greenfield development is important to “provide housing choice for the people of Sydney”. Often this choice means living in an area with poor infrastructure and little public transport, because this is the only place you can afford. Rather than ensuring the continuation of such opportunities, the Government should be focussing on developing affordable housing in existing suburbs near jobs and transport links.

In any event the Greens do not believe that a \$500,000 house and land package on Sydney's fringes is affordable for most people, but the government promises nothing else.

There is a mention made of ensuring “Affordable housing for a mix of very low, low and moderate income earners will be provided across Sydney” however apparently the only strategy identified to deliver this will be a “Review of Affordable Housing SEPP”.

The problem of ensuring an adequate supply of affordable housing in NSW is one that should be at the heart of this strategy, a bare commitment to undertake a review will fail to deliver this in any meaningful way. This Strategy is meant to be the review. Mandated



affordable housing targets, with the capacity of local communities to deliver higher targets must be included if there is to be any delivery of genuinely affordable housing.

Objective 7: Deliver well-designed and active centres that attract investment and growth

The target of ensuring that medium and high density housing is within walking distances of existing and new centres is generally supported, provided it is not simply imposed on unwilling communities. In addition to this there should be strong input from public health policy experts to help guide planning of cities that encourage active living and decrease 'obesogenic' environments.

The encouragement of Crime Prevention through Environmental Design is also supported and has been core Greens policy for some time. In this regard we would recommend that the Department incorporate specific reference to the world class urban design work produced by Leichhardt Council in 2010 to 2011.

The draft Strategy claims that it will "enhance and celebrate our built and cultural heritage. Heritage items can be the inspiration for how a renewal program is undertaken and become a major attractor in places following change." This is not however borne out in the bulk of the strategy which is almost completely reliant on the imposition from above of strategies to control land use, and on exemptions from planning controls like heritage protections to "encourage" development.

Unfortunately the 'develop-regardless-of-heritage' culture found in the Metropolitan Strategy is consistent with that proposed in the Government's Planning White Paper. Taking both these documents together, the Greens NSW are very troubled for the future of some of the most precious natural, cultural and built heritage in Sydney.

The Greens urge amendments to the draft Strategy to include the highest level protection for this city's heritage.

Objective 8: Create socially inclusive places that promote social, cultural and recreational Opportunities

The bulk of the strategy to achieve this objective appears to be through 8.1 "Prepare guidance on planning and delivering community facilities for local areas" these supplementary guidelines will be developed by the Department of Planning and Infrastructure in collaboration with agencies and councils.

The Greens are very concerned that such "guidance" will be a little used ancillary provision in future planning documents rather than a central part of good strategic planning. More



must be done in the final Strategy document to ensure social inclusion is a key part of the planning documents, not just a footnote.

Objective 9: Deliver accessible and adaptable recreation and open space

The preservation and development of open space in NSW is strongly supported, as are plans to ensure that open spaces are connected by walking trails, cyclepaths and streets. The preservation of these spaces and the development may come into conflict with other proposals within the strategy, and care must be taken to ensure that where this occurs open green spaces are preserved and enhanced.

With the rise of cycling, running and walking as active pastimes of ever larger segments of the population attention should be given to providing safe and accessible spaces, particularly in the form of open space corridors.

The strategy identifies that “Public access to Sydney Harbour, its catchment and other waterways will be extended” – it should be noted however that even until recently proposals for a private hotel in the harbour at Barangaroo were being seriously considered. A commitment must be made to ensure that these public harbour spaces are kept in public hands and with full public access.

E. Productivity and Prosperity

As with the imposition of arbitrary housing targets based on departmental modelling, the jobs targets for areas across Sydney appear to be little more than a set of possible targets. The Government has announced this policy as if it has itself generated hundreds of thousands of new jobs, which given the lack of financial commitments or concrete plans is highly misleading.

Objective 10: Provide capacity for jobs growth and diversity across Sydney

The strategy identifies the setting of jobs targets as a direct way of sending signals to the market about “new opportunities across Sydney, allowing the market to respond.” In this the Government is essentially outsourcing the delivery of this promise to the market. The role of the Government in assisting with this should be to provide adequate funding for infrastructure development and some clear strategic guidance on how industry and employment opportunities can be accommodated and facilitated.



In its present state the Metropolitan Strategy is more like a Field of Dreams than a Marshall Plan and is likely to produce little in the way of sustainable employment growth in Sydney.

In addition, while mention is made of higher education as a driver of jobs creation there are no commitments to increasing the opportunities available in NSW for this. Jobs, skills and advancement in Sydney would be promoted by a Metropolitan Strategy document that built on a growing, rather than shrinking, TAFE sector. For this aspect of the Metropolitan Strategy to really work, it must be part of a broader whole of government commitment to more tertiary education opportunities in Sydney.

Instead of committing to long term investment and engagement on these issues, the State government is proposing that most of these initiatives be delivered by councils who are forced to amend their Local Plans. This is not a partnership with local government, it is the imposition by State Government of its vision for planning, whether or not it is considered appropriate or desired in the local area.

This aspect of the Metropolitan Strategy is both undemocratic and unworkable and should be reviewed from first principles.

Objective 11: support the land use requirements of industries with high potential

This objective is primarily to be achieved through the development of “Industry Action Plans” which will be developed for high growth industries.

These are identified as: the visitor economy (tourism), creative industries, the digital economy (such as information communications technology), professional services, manufacturing and international education and research.

Identification of employment clusters and their benefits is a potentially useful way of viewing development in NSW. Care should be taken however to ensure that encouragement of certain industries in particular areas does not result in unsustainable hot housing of these industries.

Objective 12: improve economic flows between Sydney and regional NSW

The Greens believe that one of the best ways to achieve this objective is to set firm priorities to shift more freight onto the rail lines in NSW. This would substantially reduce congestion and improve road safety as well as substantially reducing the environmental impact of transportation of freight in NSW.



The Metropolitan Strategy should be amended to make this clear.

Objective 13: Provide a well-located supply of industrial lands

Objectives 14: Provide a good supply of office space

Objective 15: Provide for a good supply of retail space

The clear identification of industrial, office and retail lands is a logical step to ensure both the ongoing viability of those industries that rely on these, as well as a protection for the community to ensure that these uses do not come into conflict with residential or other sensitive land uses (including environmental protection).

The key decisions on what areas are to be redeveloped for these uses, and what areas are to be protected, should be made by the democratically elected and competent Councils and not the unelected, and bureaucratic, Department of Planning.

In addition there must be clear state-mandated protection of environmental, heritage and cultural assets to ensure that especially industrial development does not degrade the urban and peri-urban environment. This is particularly important when considering extractive industries. The Metropolitan Strategy should be amended to make this clear.

Objective 16: Achieve productivity outcomes through investment in critical and enabling infrastructure

This is a fundamental underpinning of any growth plan. However it is undermined by the strong reliance on greenfield areas and Urban Activation Precincts to achieve this.

To properly deliver appropriate infrastructure the Government needs to be working with local communities and their councils to identify predicted infrastructure needs and work in collaboration to develop delivery projects for these.

The attempts in the Metropolitan Strategy to deliver long term infrastructure planning are unfortunately being undermined by parallel proposals in the Planning White paper. In the White paper the proposal to force councils to expend developer contribution levies in a limited time period will greatly reduce the ability of councils to plan for large infrastructure projects, or plan to acquire much needed, and expensive, public open space.

This conflict between the draft Strategy and the consultation White Paper is yet another reason to withhold completion of the Strategy until after the planning reforms are delivered, hopefully with significant amendment, by the Parliament.



Objective 17: Balance the development of mineral resources and construction materials with the protection of other land uses

As stated above, “the idea that it would be appropriate to “balance the development of mineral resources and construction materials with the protection of other land uses” is fanciful at best, considering the substantial conflicts between extractive industries and most other land uses”.

This element in the Strategy should be abandoned and an unambiguous prohibition on CSG exploration or extraction should be included.

F. Healthy and resilient environment

OBJECTIVE 18: Use energy, water and resources efficiently

Any attempt to encourage efficient energy, water and resource use is welcomed. However the draft Strategy should be amended so that it is seen as providing for efficiency gains over and above those found in the BASIX SEPP and to explicitly allow for local councils to adopt more stringent and effective standards to improve efficiency further.

OBJECTIVE 19: Build resilience to natural hazards

OBJECTIVE 20: Minimise impacts of climate change in local communities

Planning for natural hazards must include planning for climate change and the increased extreme weather events that this will cause. Unfortunately, despite large areas of Sydney being prone to inland flooding and low level coastal inundation, there is no clear proposal in the Strategy to address the challenges of climate change or the need to adapt to this increased flood risks.

There also needs to be serious re-consideration of recent moves which have made it easier to build on flood plains and in coastal areas vulnerable to rising sea levels over the medium term.

The idea that such a substantial change could be effected by developing “guidance on resilient neighbourhood and building design” is preposterous. The Sydney Metropolitan Strategy must set binding provisions in relation to climate change preparedness to ensure that the market, local councils and the community are all aware of the risks and their obligations.



OBJECTIVE 21: Improve air quality

OBJECTIVE 22: Achieve a healthy water environment

OBJECTIVE 23: Protect, enhance and rehabilitate our biodiversity

These objectives are all laudable, but as with most of the environmental and social objectives in the Strategy they are not backed up by either resources or binding controls.

Biodiversity certification must be substantially reformed to ensure that biodiversity claims can properly be assessed and any threats properly identified. Models such as the Ecological Consultants Accreditation Scheme proposed by former Greens MLC Cate Faehrmann should be considered to deliver this.

The over-reliance on greenfield development under the new Land Release Policy should be reconsidered given its clear threat to biodiversity and air and water quality. There is currently sufficient opportunity to prioritise the development of infill development on land that is no longer needed for warehousing, industry and other defunct uses.

This strategy would sustainably increase density whilst preserving precious farmland and land with high conservation value. This is one of the most obvious and effective ways to protect biodiversity in NSW.

G. Accessibility and connectivity

OBJECTIVE 24: Plan and deliver transport and land use that are integrated and promote sustainable transport choices

The Greens NSW support any move to encourage the use of public transport, as well as other active modes of transport.

However the Transport Master Plan and other documents fail to prioritise public transport in any meaningful way and continue to privilege motorways and car transport.

The comments set out above in relation to the one significant piece of additional heavy rail, namely the North West rail link, are again noted.

The strategy needs to include an urgent commitment to increased light rail and well-connected cycle networks to achieve this objective.



OBJECTIVE 25: Improve access to major employment hubs and global gateways

OBJECTIVE 26: Improve accessibility and connectivity for centres and for new urban areas

OBJECTIVE 27: Deliver efficient freight connections

OBJECTIVE 28: Protect corridors and sites for our long-term transport needs

OBJECTIVE 29: Improve transport connections with regional NSW

These objectives have been largely addressed above.

The strategy suggests these objectives will be achieved in part by: “Us(ing) Urban Activation Precincts to demonstrate how to plan for greater use of public transport, more walking and cycling and better integration of transport and land use”. Given these precincts are in general not accompanied by financial commitments to improve infrastructure needed for these activities, considering them as guides is flawed.

The lack of community consultation, absence of financial commitments to infrastructure and poor strategic planning associated with the proposed UAPs will not allow for them to be successfully integrated into the city.

These aspects of the Strategy should be fundamentally reconsidered.

H. Subregions

The Metropolitan Strategy identifies six new subregions for Sydney. These new subregions are said to better reflect the economic geography of Sydney than the previous subregions. This will, it is said, facilitate better land use outcomes across Sydney and drive economic growth.

The Greens NSW are concerned that this reshaping of Sydney’s sub regions is a first step towards delivering unpopular council amalgamations and regional super councils.

We will reserve our specific comments on these aspects of the strategic planning documents until comment is sought on any subsequent sub-regional planning documents.

If suggesting improvements to the draft Strategy please explain why improvements are needed.

All proposed improvements have been set out above in this submission’s substantive contribution.



If suggesting improvements to the draft Strategy, please explain your recommended alternative

As noted above, proposed improvements have been set out in this submission's substantive contribution.

Conclusion

Thank you for the opportunity to make this submission. While much of the submission is critical of the draft Strategy this submission is made in the hope that further meaningful consultation is being engaged in.

In addition to the concerns raised above there is one very specific concern as to the delivery of this Regional Strategy ahead of the government's legislated planning reforms as proposed in the White Paper.

The White paper and associated exposure Planning Bill propose the introduction of Strategic Compatibility Certificates ("SCC"). These certificates are an unwelcome attack on the integrity of strategic planning under the proposed new planning laws. SCCs allow Director General of Planning to "certify that specific development on specific land is permissible" ... "despite any prohibition on the carrying out of the development" in a local plan.

This means the SCC can override the local planning laws whenever the Department thinks that provisions in a local planning law prohibiting the development have not been amended to "give effect to" a regional or sub-regional growth plan. In effect it gives a free hand for developers to challenge any restrictions in local planning laws by going directly to the State government for site by site rezonings.

In the eyes of the Greens and most of the community these certificates are something that will inevitably be used by developers to challenge local planning laws try to retain residential amenity or retain precious open space at the expense of development.

Whilst the government has said they will be limited to operating only while local planning instruments have not been amended so as to implement regional and sub-regional planning documents this will still give them a pivotal role in the first two to three years following the passage of any new laws. Given the unseemly haste with which the government is pursuing adoption of the Sydney Metropolitan Strategy it is clear that the intent is for this document to be in place when the new planning laws are put through and for it to then be (ab)used by developers in seeking SCCs.



The combination of SCCs and the hasty adoption of the Sydney Metropolitan Strategy suggest that there is an agenda behind these planning changes.

In light of this, and the government's stated commitment to genuine strategic planning and community engagement, there is a real concern that the rapid adoption of this Metropolitan Strategy is not driven by a desire for community centred strategic planning, but rather is part of a two-step plan to deliver developer driven approvals across Sydney.

The Greens NSW urge the NSW government to seriously rethink the direction adopted in the Draft Metropolitan Strategy and to withdraw the document until after the passage of any amended planning laws in the NSW Parliament.

Thank you again for considering this submission.

A handwritten signature in black ink, appearing to read 'D. Shoebridge'.

David Shoebridge
Greens NSW Planning spokesperson