

Draft Metropolitan Strategy for Sydney,
Department of Planning & Infrastructure,
GPO Box 39,
Sydney NSW 2001

**SUBMISSION FROM SAVE HUNTERS HILL MUNICIPALITY COALITION (SHHMC)
RE: DRAFT METROPOLITAN STRATEGY FOR SYDNEY**

Dated 20 June 2013

A - OBJECTIONS AND CRITICISMS

1. STRATEGY AND WHITE PAPER SHOULD BE WITHDRAWN

1.1 It is clear that this Draft Metropolitan Strategy should be withdrawn at this time. The Government in the Planning 'White Paper' and during consultations has stated that the community will be fully involved in a lengthy consultation process from the local level up to the strategic level in a world's best process to ensure that their concerns are incorporated into a new Growth Plan for Sydney. The model of Vancouver has been touted, where this process was indeed lengthy and detailed. This is going to happen it is said because your rights to be consulted and to object at the development application stage are going to be taken away. This doesn't matter so it is said, because you have been listened to and involved at the strategic stage and you are being asked now to make submissions about how this consultation might best be done.

1.2 Can you imagine the shock, dare I say the horror and anger, when some in the community first became aware that the major strategic plan, the Growth Plan for Sydney, was in fact the Metropolitan Strategy for Sydney. This document was already out for comment, with targets set, down to the last person and job number, and places for intense development listed and shown. Not many in the community were or are aware that this document is out and not many have been engaged in its process.

1.3 How should one describe this? What words come to mind? Misrepresentation, lack of openness and transparency - one can think of others. The Strategy must be withdrawn to allow a full and complete public consultation to take place in relation to a Proper Plan for Sydney. The 'White Paper' and Draft Bills are so flawed that they cannot proceed in their present form and must be withdrawn.

2. NEED FOR PROPER PRIORITIES

2.1 Growth and jobs dominate the whole approach to this Metropolitan Strategy as it does in the 'White Paper' and draft Bill. This is not good planning or best practice planning. Economic considerations including growth are but one factor in working out an appropriate planning strategy and plan for Sydney. Other considerations obviously include properly protecting the environment, heritage, biodiversity and those places valued by communities. These all have to be properly considered, evaluated and protected, and potential risks guarded against so that the planning system will in fact hand on a better place, a better Sydney for future generations.

2.2 With growth and development dominating the process, what will in fact eventuate will be poor developments bitterly opposed by communities, and a degraded environment. Sydney does not deserve this. The Department of Planning doesn't develop land or put up buildings, this is done by developers who are motivated solely by profit and not by the public interest. That is why you have to get the planning system right before you start to consider growth and where it should take place.

2.3 Ecologically sustainable development (ESD) principles should be at the heart of any decent planning system. It is in many NSW Statutes and accepted internationally. In plain language it means that you must keep and protect those things that are rightly valued and needed by communities – including the environment, biodiversity, heritage natural and built, agricultural lands and water. One should also guard against risks of environmental damage. Once properly protected one can then look at an appropriate level of growth and jobs and where to put them. A number of these ESD principles have been removed from the draft Bill.

3. ENVIRONMENT AND HERITAGE

3.1 The statements in the Strategy and Guide - "Heritage and cultural areas will be protected" and "Develop new schemes in partnership with councils to protect areas that are culturally and historically important" and "Sydney's heritage is a connection to our shared history and identity" and "We must protect and promote places and objects of value to our diverse community" and "The Strategy aims to protect and improve biodiversity as the city grows" and "Identifying cultural heritage values early in the planning process" – all these aims the community strongly supports.

3.2 However the above are but statements in the Strategy, they have been given no support or teeth in the draft Planning Bill. The Municipality of Hunters Hill is a significant heritage place, much of which lies within conservation areas, but in the draft Planning Bill its present protections would be swept away. This is so with many other places in NSW whose identity and character is highly valued by communities. This clear difference between what is stated in the Draft Strategy for Sydney and what is in fact being proposed by the Department of Planning in its 'White Paper' and Draft Bill is of great concern to communities and frankly has led to a loss of trust and faith in both the Government and the Department.

4. TARGETS

4.1 Nowhere is it set out how the targets in the Strategy have been worked out. How have the targets been assigned to the various regions or subregions of Sydney? Did someone simply take the previous targets from 2008 for each local government area and just add them up for a subregion? It states in the documents that the targets have gone up 17% for housing and 33% for jobs and that this is a significant expansion on the previous strategy.

4.2 No one has ever revealed how those figures have been arrived at and allocated even in the previous strategy. The State Plan 'NSW 2021' talks about government and its agencies being transparent and open with the community. Why is it not being transparent in relation to this?

5. HOUSING TYPES

5.1 It is suggested that there should be a mix of housing. This is clearly necessary and desirable, but the issue is what is the right mix and where. You are not going to put high rise in the heritage villages

of Paddington and Watsons Bay. You are not going to put infill into Hunters Hill when its heritage value is as a low-density garden suburb of national heritage significance. Or, are you going to – is this what is being proposed?

5.2 Instead of developers pulling down valuable housing stock a real attempt should be first made in appropriate areas to keep housing stock and modify or make additions to it so as to increase occupancy, and not destroy the existing character of places valued by communities.

5.3 If the proposals proceed under the 'White Paper' there is no confidence that what is built will be of good design or in keeping with the character of established areas. The protections are just not there in the draft Bill.

6. WHERE IS GROWTH TO BE PLACED

6.1 The Strategy states that growth by way of infill will take place in established areas. For example in the Central subregion, it states that housing intensification will take place throughout the subregion. Is it meant by this that the previous policy of every area 'taking its share' of intensification, regardless of environmental considerations and clear differences in character, will continue to apply in relation to targets? In reality developers will choose those areas where they can make most profits.

6.2 Many of the inner areas of Sydney have been subject to urban consolidation and high housing targets over many years. This has resulted in their special character and heritage values being either diminished or placed under real stress, and their streets and roads clogged with traffic. Is it intended to continue to destroy those suburbs that are highly valued by their communities in order to meet or exceed arbitrary future targets that remain unexplained and unintelligible?

7. INFRASTRUCTURE

7.1 The State has failed for many years to fulfil its promises in relation to infrastructure. In relation to the proposed changes to local government, the State Government is saying to the Review Panel that it has no available money, and that councils will have to raise funds from ratepayers or contributions from developers for local infrastructure. This is from a State Government that retains rate-pegging and cost shifts its obligations onto local government, which as a result is starved of funds.

7.2 In relation to decision-making, the most important decision the Government could make about infrastructure is to go ahead with the second airport at Badgerys Creek. It is the only place within the Sydney Basin for it, the expert advice is that it should proceed there as a matter of urgency. The best the State Government can come up with is a second airport for Sydney at Canberra. Is that good decision-making? If it went ahead at Badgerys Creek it would provide real benefits in jobs and housing for Western Sydney. Such an airport must of course be subject to proper and stringent environmental controls and adjoining 'affected land' rezoned to a 'higher use' - industrial or commercial, so that any affected resident would not be economically disadvantaged and would have an incentive to sell and move.

7.3 The need for infrastructure and transport to be delivered to allow for development is supported as long as it arrives at the appropriate time and also applies to established areas where there is

going to be further infill development. Many of the inner areas of Sydney are already at capacity. One should not add further congestion and additional environmental and social problems to these areas.

8. DECENTRALISATION

8.1 In spite of the rhetoric not enough is really being done to encourage people to move away from the cities or not to come to the cities. The same principle applies as is being considered in this Strategy, jobs need to be encouraged in centres where they have a relevant base economically - people would follow if work was available.

8.2 This means that incentives, initiatives and leadership must come from Government. The community does not wear the argument that the government and its citizens just have to accept that we have to take and accommodate all those who are being enticed into our cities.

9. SPEEDY DECISIONS FOR DEVELOPERS

9.1 The Strategy talks about 'more certain decision-making to stimulate investment'. In plain language what this means is that the Government is intending to take away local democracy, that is decision-making by elected representatives, and have undemocratic panels of appointees do as they are directed from plans imposed or influenced above by State Government. Developers are to gain and the big losers will be communities and the environment.

9.2 The Strategy states that the proposals would 'revitalise existing neighbourhoods'. What this really means is that developers will be able to get speedy approvals to demolish and develop by ticking boxes in a code, which must be then approved without notification to residents. Because of proposed changes in zones, many of these developments will not be in keeping with the desired character of areas valued by communities.

9.3 There is talk about design guidelines in the Strategy. However most approvals will be complying or code assessments where considerations including design, character, privacy, overshadowing and views will be not be properly considered. In other words it won't be a merit assessment. What will result will be developments that are standardised and ordinary with no real attempt to meet the context and community values of where they are placed.

9.4 Urban Activation Precincts mentioned in the Strategy are a vehicle that can be driven by developers to over-ride existing zonings, heights and densities, with little that the community can do about it. This makes a mockery of good planning.

B - PROPOSALS IN THE STRATEGY THAT ARE SUPPORTED WITH SAFEGUARDS

10. MAJOR CITIES

The proposal for jobs and housing in the major centres or cities - Global Sydney (Sydney CBD and North Sydney), Parramatta, Liverpool and Penrith is supported. This makes sense from the point of view of getting people to work near where they live and help relieve serious transport problems. Consideration could also be given to a future city in the North West and one in the South. Within

major development areas and indeed across the board, proper planning needs to protect critical matters already discussed in 'A' above.

11. OPEN SPACE AND CONNECTIONS

The need for open space is critical as are the 'green corridors' between them. The statements in the Strategy "Sydney's unique geography and green web of parkland, bushland reserves, beaches and waterways gives the city an advantage and is valued by residents and visitors" and "Link regional open spaces to form a green space network across Sydney" and "the NSW Government will work with the community to protect Sydney's local environment" and "the Strategy recognise the positive impact of an attractive, healthy and resilient environment to Sydney's overall quality of life and success" - all these statements are strongly supported. Resources must be allocated to speedily complete the walking and cycling networks in Sydney - from a recreational, health and tourist point of view. Sydney is arguably the world's best city for walking and to provide the funding to complete the 'Sydney Harbour and Coastal Walking Network' is urgent.

12. AFFORDABILITY OF HOUSING

This does not necessarily just come from increased numbers of dwellings built by property developers. Government needs to be actively involved in the delivery of genuinely cheaper housing and where it is positioned.

13. RURAL AREAS

It is very important that the agricultural areas surrounding urban Sydney be retained and protected. They must not be nibbled away at over time for further housing. We must protect our local food supply for Sydney as much as we need to protect our local water supply. However with water we can also improve the way we use our existing resources, as suggested in the draft Strategy.

C – CONCLUSIONS

The proposed Planning changes driven by the 'White Paper' and Bill, and including the Metro Strategy, are clearly in breach of a number of the NSW Government's own goals in its State Plan, called 'NSW 2021':

- Goal 22 'The NSW Government will work with the community to protect our local environment',
- Goal 27 'Recognising and protecting the State's most significant heritage places and values',
- Goal 29 'The implementation of a new planning system will centre on merit and public interest',
- Goal 31 'The community has the right to openness, accountability and transparency',
- Goal 32 'People to have a real say and be involved in localised decision making, including through local government'.

While there is some good material and concepts in the draft Strategy, the question has to be asked - can this be believed and would it be delivered? The immediate answer is no - the 'White Paper' and draft Planning Bill are clearly fatally flawed. What is being proposed is 'world's worst practice' for Planning. It must be rejected. It has already been rejected by the vast majority of communities in New South Wales.

A Regional Plan for Sydney, not with the name 'Growth Plan', needs proper consultation with communities before it is finalised in accordance with best planning principles.

We consent to the submission and its content being made public.

Yours sincerely,



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This submission has been sent by post and has also been sent to:

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