

Greater Sydney Commission

Towards our Greater Sydney 2056

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1. INTRODUCTION

Save Our Suburbs (SOS) expresses appreciation for this opportunity to comment on the 40-year vision to enable a more productive, livable and sustainable Greater Sydney

SOS is a non-profit and non-aligned group of residents, opposing unwanted rezoning and over-development of city suburbs and promoting sustainable living to protect the planet. The organization supports residents in their struggle to save cities from overcrowding, traffic congestion, high housing cost, pollution and loss of gardens, bushland and heritage resulting from ill-considered planning impositions and supports whole of nation development. The organization is active in endeavouring to persuade State Governments to effect beneficial changes to planning policies.

2. A CHANGING GROWING GREATER SYDNEY

The primary background factor relating to this growth is that the Sydney population is projected to grow from the current 4.7 million to 8 million by 2056. This necessitates fundamental decisions relating to:

- To what extent growth will rely on Government initiatives and the extent it will rely on private initiative.
- Geometry dictates that housing this increased population requires an increase in population densities and/or increase in settled area. The decision regarding optimal densities needs to be evidence-based and not determined by ideology or other irrelevant considerations.

The overarching planning policy for Sydney is focussed on higher densities. A five-year target for an increase in the number of dwellings in Sydney has been set at 189,000.

A metropolis of three cities

The vision of a metropolis of three cities is a promising step in moving away from a nation dependent on a few capital cities for its growth. Most countries in the world are more decentralised than is Australia.

The vision of using the anticipated Western Sydney Airport as the focus of one of these three cities is a promising start.

3. A PRODUCTIVE GREATER SYDNEY

3.1 The 30 minute city

A fundamental feature of *A Plan for Growing Sydney* mentioned several times is the concept of a “30 minute city” - - “a city with more jobs in many centres, with more people being able to access their jobs within 30 minutes of where they live”.

The document does not provide an example of such a city or any concrete evidence that this is achievable.

Available evidence points to the contrary.

(a) Historical attempts to attain such an ideal have met with disappointment. An example of such a failure is the Markelius Plan for Stockholm which clustered high-density residential together with work opportunities on transport nodes. Contrary to expectation the result was the vast majority the residents in these centres working elsewhere and most jobs in the centres being filled by in-commuters.

(b) The low percentage (21.4%) of working residents who work in their home district in high density Hong Kong (25,900 persons per square kilometer) with excellent public transport conforms to this experience. This percentage is practically the same as in Los Angeles (18.5% with only 2,400 persons per square kilometer).¹

(c) Large high-density cities such as Hong-Kong and Tokyo with excellent public transport feature longer journey to work times than less dense cities such as Los Angeles, Dallas-Fort Worth or Sydney.

(d) In a theoretical city incorporating the concept of co-locating residences and work opportunities, even if a family were to locate to a high-density centre due to the adjacency of employment and other facilities for one or more members, it is unlikely that this situation will remain static for any length of time. Change, such as shift in employment, other family members working elsewhere or taking part in different educational, sporting or entertainment activities, is likely to occur. This will negate any initial advantage offered by location in the particular centre. The family is unlikely to move their place of abode as a result of such changes.

A large city evolves as a result of the large diversified pool of labour, jobs and facilities that it provides. It develops multiple attractors, such as distinctive work opportunities, specialist supplies, schools of choice, universities, unique sports and entertainment. Only a tiny fraction of this variety can be located within the envisaged centres.

Of course attempts should be made to conveniently locate work opportunities where practical. In Sydney the clustering of businesses, such as retail, accommodation, cafes, restaurants, childcare facilities, estate agents, accountants, lawyers and doctors has evolved naturally in urban centres over time. However most other types of businesses need to be located in the central business district or, alternatively, have specific needs, such as a large land area and an absence of congestion, which precludes them both from the CBD and from any high-density suburban centres.

The 30-minute city concept is unproved and should not be used as a justification to impose high-density onto unwilling communities.

3,2 Urban renewal

Urban renewal is reliant on new housing in existing and newly devised centres. In practice this entails forcing higher densities onto unwilling communities situated in areas the infrastructure of which was originally designed for lower densities. This has typified the planning policy of the NSW Government for the last three decades. The policy has been to a degree more extreme than in other jurisdictions that pursue this ideology and the undesirable consequences such as unaffordable housing have been proportionately more severe. The results of this policy at a local level are strongly resented by the community. Basic downsides are seen as an increase in congestion and housing unaffordability. High-density policies are also viewed as causing a reduction in factors relating to quality of life, community wellbeing, residential amenity, good urban design and environmental and heritage protection ²
³.

3.3 Public transport Decisions regarding the enhancement of public transport need to be objectively made. The current City South Eastern Suburbs Light Rail project is an example of poor decision making. The downside predicted by this author in December 2014 is now becoming glaringly evident. This includes

hindrance to other transport facilities, reduction in capacity compared with current systems, reduced accessibility to homes, businesses, parks and other facilities along the route, the elimination of parking spaces, the cutting down of hundreds of street trees, increased greenhouse gas emissions and an escalating cost exceeding that of alternative metrorail.⁴

3.4 Heritage items valued by the community including traditional period architect-designed housing, are often lost as a result of urban renewal⁵

3.5 Medium density is being proposed to be considered as complying development in single residential areas. The result will be increased traffic congestion, reduction in on street parking, greater demand on sewerage and stormwater infrastructure, schools, sporting fields as well as decimation of urban greenery and wildlife. There will be a loss of backyards with detrimental effects on spaces in which children can safely play (see below).

3.6 New communities in land release areas

It is encouraging that the focus is more on land release areas than has been the case in the recent past. Greenfield land release had been reduced from an historic 10,000 lots per year to less than 2,000⁶. The cumulative effect of this consistent undersupply has resulted in a huge backlog the effects of which on housing unaffordability will take a prolonged effort to counteract.

If land release were to be unimpeded by the current high density ideology, even if a significant portion of the gross land available in the area considered were not to be considered suitable for development there will still be a large area available to ensure competitive pricing. The area of the Sydney basin is 44,000 sq km [NSW Geological Survey], that of the Sydney statistical division 12,145 sq km and that of Sydney contiguous development is 1,788 sq km⁷.

4. LIVEABLE GREATER SYDNEY

Housing choice and diversity does not fit with the overarching planning policy for Sydney being based on higher densities.

High density policies result in a reduction in housing choice, particularly for families. Most in-fill development consists of apartments, which are not suitable for bringing up young children. It is reported that there are poor health and parenting outcomes. Keeping children quiet emphasises activities that are sedentary. There is a lack of safe active play space outside the home^{8, 9}. Indeed, the majority of those currently living in apartments do not do so by choice¹⁰.

A survey in one locality indicates multi-storey apartments are not even acceptable to most people wishing to downsize if they have other choices, such as smaller single residential houses or villas. Only 5% chose to live in a unit. This survey of some 4000 ratepayers drawn was up by the author and conducted by Ku-ring-gai Council^{11, 12}. Anecdotal evidence indicates this result corresponds to be a widely-held preference throughout the Sydney region. Further, a United States survey showed

that 80% of respondents preferred a single family detached house and 8% an apartment¹³ .

5. A SUSTAINABLE GREATER SYDNEY

Higher densities, the predominant feature of the planning initiatives are detrimental to sustainability,

Energy consumption per capita is greater in apartments¹⁴ . There is significant common electricity consumption of the whole apartment block, which includes energy used by such items as lifts, lighting common areas, such as foyers and car spaces, and the common components of air conditioning.

Studies also show that, contrary to expectation, per capita water consumption is hardly different for those living in units, than for people living in single residential housing¹⁵ .

Higher densities result in the destruction of habitat and a reduction in biodiversity. The impact of gardens and open space being replaced with unit blocks has a severe effect on urban plant and animal life ¹⁶. Gardens, public parks, trees and bushland are at great risk of destruction due to high-density policies. The Draft District Plans fail to recognise this threat.

Higher density decreases the proportion of land that can absorb rain. The reduction in roof area per inhabitant results in less rainwater that can be used for domestic purposes and less sun energy that can be captured,

High density considerably increases the incidence of mental illness. An important letter in the journal Nature discusses urban neural social stress. It states that the incidence of the major brain disorder schizophrenia is approximately doubled in cities, with differences found in certain brain area activity and evidence of a dose-response relationship that probably reflects causation¹⁷. There are other documented negative health effects, such as those resulting from an absence of green space¹⁸.

6. TOWARDS OUR GREATER SYDNEY 2056

The necessity of genuine community input

Successive planning strategies that have been promulgated during the last few decades are seen as measures that *benefit the development industry and those organisations reliant on it rather than the general public*. The community has been concerned about the undue influence these organisations have had on the government of the day. This was first brought up to general public attention by me in 2001¹⁹ and has been in the public area ever since ^{20 21 22 23 24 25 26 27 28 29 30 31 32 33} . Even though this concern eventually resulted in political donations to developers and their associates being banned in NSW it is still considered that they use the resources previously allocated to donations to influence politicians, the public service and academia in other ways.

The Greater Sydney Commission appears to be complicit in continuing this high density policy. It is resorting to extraordinary efforts to “sell” its strategy. Multiple high-level community information and consultation sessions have been held. This appears to be an effort to avoid electoral backlash from initiatives that assist the continuation of the underlying policies that have been pursued. None of the consultation sessions appear to be genuine. Attractive scenarios are portrayed and the input from the community encouraged with no indication of practical methods of achieving desired outcomes. Concrete processes are not reflected in the rhetoric in the publications being distributed.

If the NSW Government genuinely wishes to incorporate community input to the planning process this would allow the greatest practical degree of a **community-up approach**. However the underlying basis of the amended legislation and indications of the Greater Sydney Commission operations are **typified by a dictatorial top down approach**.

Indicators of this approach include:

- Local strategic plans will not be the basis of a state strategic plan. Local strategic plans will have to be subject to district plans which will be subject to a state strategic plan
- Local planning statements such as rezoning will need to be endorsed by the Department of Planning and Environment for the Greater Sydney Commission
- The Minister will have the power to direct local planning panels
- Councils are required to obtain signoff for local strategic planning statements from the Department of Planning and Environment or the Greater Sydney Commission. This is too directive and does not give councils adequate opportunity to incorporate local knowledge and expertise in plan-making.

The objectives and functions of the Greater Sydney Commission:

- to lead metropolitan planning for the Greater Sydney Region
- to provide advice and make recommendations to the Minister on matters relating to planning and development in the Greater Sydney Region
- to assist local councils in the Greater Sydney Region and other government agencies (including an agency of the Commonwealth) on the implementation of any plan or proposal relating to development in the Greater Sydney Region

³⁴

indicate compliance with a top-down approach.

7. SUGGESTIONS

We recognize that the Greater Sydney Commission is not directly responsible for devising and enacting applicable legislation and policy, however, we understand that it is within the scope of its work to seek to mitigate the barriers and challenges affecting the implementation of strategic planning. To achieve this the Greater Sydney Commission should work towards the following objectives.

7.1 A planning system should respect people's right to generate the strategic plans which guide the future of their community and the right to participate in the subsequent development decisions. It should belong to the people. Government imposed quotas have no part in this process and should only be used as a very last resort.

Save Our Suburbs suggests that a better approach to accommodate an increasing population would be along the following lines of:

- Councils prepare a short-term and a long-term concept plan for their area in consultation with their communities (utilizing precinct committees if available)
- Council groupings (such as Regional Organisations of Councils or Regional Planning Panels) assemble these concept plans after discussion with submitting councils on an iterative basis and on completion submit them to the Secretary
- The Planning Secretary maintains a State-wide database of these short-term and long-term concept plans to be used as part of the input for NSW planning policies and draft regional growth plans.
- The process must flow in both directions, but initiating at the local community level and flowing upwards to be followed by an iterative process.

Such a system could result in councils competing for development and developers being channelled to areas seeking development. If a dwelling shortfall results then councils would need to accept quotas which would be deliberated in the above process.

7.2 A new State Environmental Planning Policy should be issued requiring all developments to maintain or enhance quality of life, community wellbeing, residential amenity, good urban design and environmental and heritage protection.

7.3 The Government's State Environmental Planning Policy (Exempt and Complying Development Codes 2008 and its Draft Medium Density Housing Policy must not be allowed to override existing laws protecting these attributes referred to in 7.2.

7.4 There should be a focus on facilitating the development of clusters of like organisations. An example is the knowledge-based cluster the University of Western Sydney is attempting to create with the Werrington Park Corporate Centre, the 1 Parramatta Square campus and the Sydney Olympic Park campus.

7.5 Currently available green space should be documented and quantified and concrete measures put into place that will ensure that this asset is preserved.

7.6 Any crown land containing green space that is transferred from the NSW Government to a local Council under Section 4.6 of the Crown Lands Management

Act 2016 must be the subject of a special reservation prescribing that the green space contained within the land transferred must be retained as such, in perpetuity.

7.7 A greater emphasis should be put into creating new communities in land release areas. The most effective way for this to happen is for landholders on the outskirts to be allowed to subdivide their land (subject to reasonable constraints and government providing the necessary trunk infrastructure).

7.8 **Planning should be based on empirical evidence** so as to achieve long-term environmental amenity, social amenity and economic welfare of the community. It is suggested that as far as is possible this be left to the private sector with government providing an optimal environment for these goals.

If the population of Sydney is to increase, the consideration of alternative growth paths should encompass a broader canvas than restrictively focussing on imposing higher densities onto unwilling communities. Examples of large cities with relatively unrestricted planning policies that are at the forefront of economic expansion can be seen in the southern United States.

Cities are much too complex to be approached in the manner that has been pursued in Sydney during the last three decades. Jane Jacobs marvelled at the intricate order of cities as a manifestation of the freedom of countless numbers of people to make and carry out countless objectives and schemes³⁵. Gordon extends this insight to supply chains (including spatial arrangements) in which market price signals facilitate the cooperation of large numbers of participants³⁶. Cities compete most effectively when labour and capital are mobile. This means prospective locators must be able to discover locations that optimise their assessment of costs, such as travel time, with benefits such as residential amenity and local character.

The New South Wales Government should ensure that properly designed user fees, markets and incentives are in place, in order to optimise market-driven development for the long-term benefit of the wider community, coupled with safeguards to ensure that externalities, such as environmental considerations, are properly taken into account. The goal should be the long-term welfare of the population, coupled with maximising the sustainability of the natural environment.

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² Recsei Tony, June 2012 "New Metropolitan Strategy, Sydney over the next 20 years". <http://www.planning.nsw.gov.au/LinkClick.aspx?fileticket=tOrvnPMKz5k=&tabid=205&mid=1081&language=en-AU>

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⁴ Recsei Tony, *Sydney Morning Herald*, 22 December 2014, "Choked transport arteries need underground solution",

⁵ "Of Form Assembled in the Light". The National Trust's Submission to the Chairs of the NSW Planning Review. *Sydney: National Trust of Australia (NSW)* 2011.

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