



*Advocating for the people of Western Sydney*

**SUBMISSION TO THE NSW  
DEPARTMENT OF PLANNING AND  
INFRASTRUCTURE ON THE  
*DRAFT METROPOLITAN STRATEGY FOR SYDNEY***

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## INTRODUCTION

The *Draft Metropolitan Strategy for Sydney to 2031* seems to have taken into account some (though certainly not all) of the earlier comments made by this and other organisations about the implications and challenges of projected growth for Western Sydney. The inclusion of a number of Western Sydney precincts in the list of “nine city shapers” and the focus on employment and infrastructure issues in the region are a welcome acknowledgement of the significance of Western Sydney, its challenges and its impact on Sydney as a whole. Time will tell how serious the Government is about this and how effective policy decisions are in addressing these issues. However, as indicated below, some serious question marks remain.

## EXECUTIVE SUMMARY

- WSROC welcomes the focus on “boosting housing and jobs growth across all of Sydney” (p6). The focus on addressing Sydney’s housing shortage and affordability problem is encouraging and the target of 545,000 new dwellings is broadly supported. So too, is the commitment to providing a variety of housing to meet various community needs, including the need for more affordable housing. The Strategy rightly recognises the need for housing to adapt to consumer demand but this must not mean a blind “follow the market” approach. It also needs to incorporate the Government’s strategic objectives.

The commitment to achieving a balance between urban renewal and greenfield development is welcome, but for reasons discussed below, this balance must lean heavily towards urban renewal and consolidation rather than greenfield development.

The recognition of the need to better integrate transport planning and employment growth with housing growth is fundamental to Sydney’s development and is also welcomed, but more detail is needed on how this will be achieved.

- WSROC’s greatest concern with the Draft Metropolitan Strategy is that it does not adequately address Western Sydney’s job shortage, even though it does acknowledge the imperative of creating more jobs in Western Sydney and makes a lot of its target of generating 50% of all new jobs in Western Sydney over the next twenty years.

However, this is grossly inadequate. As the Draft Strategy indicates, 70% of Sydney’s population growth (913,000 of the projected 1.3 million) is to be in Western Sydney. This means that if the region’s relative job deficit is not to worsen, approximately 70% of employment growth also needs to be in Western Sydney (allowing for some demographic variations.). Yet the Plan’s target is only for 50% of new jobs to be in Western Sydney.

This means that the region’s already unacceptably high job deficit (of 180,000 - 190,000) could grow by another 125,000 over the next twenty years. Even if demographic factors modify this impact, (see below page 8) a substantial increase in the job deficit will still result. This will have profound social, economic, transport and environmental consequences not just for Western Sydney but for the whole city and needs to be addressed with far greater urgency than is currently indicated.

- The Draft Strategy does appear to address some of the key transport issues facing Western Sydney, emphasising the need for the integration of transport and planning so that transport infrastructure supports economic development and strengthens the connections between

housing and employment. The action items listed generally indicate appropriate priorities but the test will be in the commitment of adequate funding to address them.

The more fundamental point, though, is that planned expenditure will not be nearly enough to provide the necessary public transport or road requirements if Western Sydney's jobs deficit is not addressed. The likely increase of 125,000 in Western Sydney residents commuting daily to work in the east would place an unsustainable burden on the transport system, a fact which does not seem to be fully acknowledged in the Strategy.

As discussed in more detail below, while the Strategy does acknowledge the need for north-south public transport links across Western Sydney, the detail on the priorities and how they might be achieved is lacking.

On the other issues of freight transport and corridor identification, WSROC is generally supportive of the listed priorities, noting the urgency of corridor identification before imminent development makes that impossible.

- Another significant concern with the Draft Metropolitan Strategy is the inadequate attention given to aspects of social infrastructure. While objective 7 indicates that “cultural and social infrastructure will be included in centres undergoing growth and renewal” (p33) and Objective 8 gives an assurance that the Strategy will address “...issues of social infrastructure provision in greenfield areas, ensuring new residents have access to opportunities as soon as they move in” and that “Health, education, cultural and social infrastructure will be planned for early in the growth and renewal process” (p34), there is no detail on quantifiable targets, benchmarks, or implementation strategies, raising questions about the likelihood of achieving these aspirations.
- The Draft Metropolitan Strategy gives very little attention to the need to protect Sydney's \$1.5 billion p.a. peri-urban agriculture industry in the face of the inexorable urban sprawl which has seen a serious reduction in agricultural land in recent decades. This threat shows no signs of abating with studies showing that 50% of Sydney's vegetable-producing lands are within the designated growth areas. While the Metropolitan Rural Area is listed as one of Sydney's “nine city shapers”, none of the 29 objectives specifically focuses on ways to improve the productivity and viability of the sector or to protect agricultural land from urban encroachment.
- The Draft Metropolitan Strategy attempts to outline a strong vision for the future of Sydney with a number of positive objectives and targets that will shape the structure of Sydney in 2031. However, despite some attempts to indicate how these targets will be achieved, these are not specific enough or comprehensive enough to be convincing. This is especially the case with respect to employment targets where specific strategies to achieve the stated targets are lacking. It is acknowledged that attempts have been made to list delivery tools, timing, lead agencies and key partners but questions still remain about the adequacy of these. It is imperative that measures are directed from the top levels of government to ensure that government agencies do not work in silos but that structured and determined collaboration occurs to deliver the required outcomes.

It is important that progress is benchmarked against clearly sequenced key performance indicators. Indications that “progress on the strategy will be assessed and publicly reported each year” are encouraging and the Monitoring and Evaluation Plan listed in the Appendix is positive but again the effectiveness of this depends on the rigour with which it is enforced.

Further, as many of the economic objectives will depend on private sector responses including commercial decisions such as investment levels, it is imperative that key business representatives be included in the framing of specific policy responses to the relevant objectives. Equally, as many of the measures will require the support of local councils, it is vital that they are included in the detailed planning and delivery processes.

## Specific Issues

WSROC supports the “focus of the Metropolitan Strategy on boosting housing and jobs growth across all of Sydney.” While other factors such as transport, social infrastructure and environmental quality are also critical, the most fundamental requirements of the 1.3 million extra people who will live in Sydney in the next twenty years, including the over 900,000 extra who will live in Greater Western Sydney, are the need for housing and the need for employment.

WSROC supports the five key outcomes nominated to drive sustainable growth over that period:

- Balanced growth
- A liveable city
- Productivity and prosperity
- Healthy and resilient environment
- Accessibility and connectivity

While the draft Metropolitan Strategy is structured around these five outcomes and the 29 specific objectives contained therein, there is considerable overlap between many of the variable and issues contained in each of those chapters. For this reason, WSROC’s response, rather than attempting to strictly adhere to this structure, will focus on the key issues covered by these outcomes and their 29 objectives.

## Housing

The Draft Metropolitan Strategy clearly recognises the need to increase housing supply “... to ensure the housing needs of Sydney will be delivered and ... place downward pressure on house prices to improve overall housing affordability.” (p7)

WSROC welcomes the target of an additional 545,000 houses across Sydney by 2031 to address the general shortage of housing and supports the commitment to providing “... a wider choice of housing across Sydney so that people can work locally and can easily access shopping, education and services.” (p12) The recognition that this needs both developments to “secure appropriate greenfield housing supply” and “focus urban renewal in areas that are close to transport hubs and corridors” (10) is supported. While the Metropolitan Strategy acknowledges the need for housing supply to reflect “the growing preference for apartment living in existing urban areas, close to other suburbs and with good services” (p12), it still suggests that undeveloped land in the Metropolitan Urban Area has the capacity to provide over 200,000 houses, more than 37% of the required extra dwellings (p12). This is too high.

While there is no point in being pedantic about the number, WSROC suggests that the maximum of 30% of new housing in greenfield locations set under the previous Metropolitan Plan is a worthwhile guide. While Sydney's population density is higher than other Australian capitals, it is significantly less than most overseas cities of comparable size.

There are several benefits of a strong urban renewal /densification bias in meeting Sydney's extra housing needs.

1. As it is more likely to be closer to public transport services it will increase the use of public transport and reduce reliance on private motor vehicles. The resulting benefits include greater accessibility and reduced costs for travellers, increased utilisation and economies for the rail system, reduced traffic congestion and its associated social and economic costs, reduced energy consumption and greenhouse gas emissions, a more sustainable transport system and improved activity and health levels as more residents walk or cycle to access rail or bus services. These benefits are recognised in the Draft Metropolitan Strategy (p70) which aims to "... increase the percentage of the population living within 30 minutes by public transport of a city or major centre in Metropolitan Sydney." (p70)
2. Consolidation and renewal close to public transport can reduce the effects of geographical and social isolation associated with urban sprawl. Access to a range of community services such as community health, early intervention services, primary health care, education and community centres is more difficult in low density outer metropolitan areas such as Western Sydney where such services are less available than in eastern and inner Sydney suburbs. Mixed use medium and high density housing, particularly close to town centres, shopping services and transport, can increase access to such services. This is particularly important for socio-economic groups who are already disadvantaged such as the elderly, people with a disability and those who cannot afford private transport.
3. A closely related benefit from well-planned urban renewal is the potentially improved public health effects. Specifically, urban design affects the "walkability" of suburbs and neighbourhoods and therefore impacts on exercise levels and health. This is a result both of increased housing density and of the mixture of development. Urban renewal/consolidation developments have greater potential to yield these benefits than typically dispersed greenfield site developments, at least of the type mostly seen to date.
4. Urban renewal and consolidation is ultimately more environmentally sustainable than greenfield development and urban sprawl. Impacts on air quality, carbon emissions, vegetation clearing and habitat loss, land degradation and micro-climate all have the tendency to be greater with urban sprawl and greenfield development than with well-planned urban renewal and consolidation.
5. Urban consolidation produces less threat to Sydney's peri-urban agriculture than greenfield development and is imperative if Sydney's projected population growth is not to seriously increase that threat. Inexorable urban sprawl in recent decades has seen a steady decline in productive agricultural land in the Sydney basin and identified growth areas contain extensive areas of Sydney's productive agricultural land.

Some of these impacts will be discussed more fully below, but each gives weight to a bias in favour of urban consolidation over greenfield site development and urban sprawl for the bulk of Sydney's new housing needs.

A recent study by the Centre for International Economics (*The Benefits and Costs of Alternate Growth Paths for Sydney* Dec 2010) concluded that higher density significantly reduces the environmental, social, transport and infrastructure costs of development. It estimated that for the aggregation of these costs, compared to the 2010 Metropolitan Strategy's 70/30 target, a 90/10 scenario would cost \$2,145 billion less until 2036 whereas a lower level of consolidation with only 50% infill and 50% greenfield development would cost an extra \$3.276 billion over that time.

Evidence also suggests that infill development better suits changing market preferences. The comparative change in housing prices over the last decade indicates quite clearly that there is an "accessibility

gradient” developing in house prices. That is, housing prices in inner ring suburbs have risen much faster than prices in outer suburbs, reflecting the differing relationship between supply and demand in those regions. Between 1991 and 2012, all dwelling prices rose by 232% in Sydney’s outer ring suburbs, by 229% in middle ring suburbs and by 403% in inner ring suburbs. In the past decade, prices in middle ring suburbs rose by 248% but in outer suburbs only by 204%. (Office of Housing) This indicates a relative growth in demand for housing closer to employment, transport and services.

The other essential ingredient of urban planning and housing is its impact on social inclusion and connectedness which are important ingredients of social equity. A focus on better urban planning can help to ameliorate or prevent some of the mistakes of the past where developments created geographical and social isolation leading to the range of social problems that often accompanies it.

An extensive literature review by UNSW found that:

“Research suggests that sprawling suburbs... undermine social capital. This is generally attributed to the increased distances between uses, overt reliance on private car travel and typically closed residential form... these factors reduce opportunities for interaction and result in feelings of disconnectedness and isolation” (UNSW City Futures Research Centre, Healthy Built Environments, 2011).

On the other hand, mixed use development incorporating medium and higher density housing can reduce levels of isolation and build community connectedness by providing more opportunities for incidental contact and interaction.

“Mixed use development, if well planned and designed, has the potential to generate an interesting, vibrant atmosphere that brings people closer, increases social capital and social cohesion, addresses environmental issues and fosters economic development.” (Metropolitan Strategy Review - Sydney Towards 2036).

Carefully planned use of land close to existing transport corridors and nodes as part of an urban renewal program can help achieve this outcome. Importantly, it needs to include an integrated component of public housing, in order to help address issues of social disadvantage.

Further, the style of development has implications for public health. UNSW’s Healthy Built Environments refers to several studies which “... indicate significant associations between sprawl and physical activity” (Feng et al.) and result in “... less utilitarian physical activity and higher obesity outcomes” (and Dunton et al.). Importantly, the UNSW research review goes on to show that it is not so much density per se but mixed use in association with density which is important.

This is because “Destinations give people a place to walk to. Replacing uniform urban form with a variety of uses can lead to shorter distances, thereby encouraging active forms of transport (UNSW, Healthy Built Environments: A Review of the Literature).

Mixed use activity will not happen on its own but needs to be encouraged by planning and other policy measures. Such planning needs to incorporate the following features:

- As a prerequisite, zoning and LEPs need to be appropriate to allow varied uses, combining medium to high density housing with retail and commercial activities, community facilities and open spaces that create or retain amenity.
- It should allow for the strategic location of government services which can also provide a stimulus to attract other professional and commercial support services.

- Planning which creates recreational open spaces, walkable streets, visually attractive buildings with good design features and “destinations” encourage walking, cycling and opportunities for casual contact.
- These developments must include components of high quality housing to attract upwardly mobile households looking for medium or higher density housing options closer to urban centres.
- Such developments must also include a proportion of lower priced housing to address the affordability issue but must at the same time avoid concentrations of low SES communities which entrench social disadvantage.
- Urban renewal precincts must be integrated with commercial renewal and retail/business/professional activities that provide increased local jobs and they must incorporate a range of community services.
- Local development planning should require designs which improve safety and perceptions of safety to encourage walking and increased use of public spaces.

For all the above reasons, WSROC supports the Government’s strategy of “Urban Activation Precincts” to encourage “extensive urban renewal” and increase housing supply and density in areas close to public transport and amenities. The eight precincts identified in the first tranche appear to be logical choices and should be expanded to reduce the pressure on greenfield developments.

Whether for urban renewal or for greenfield precincts, State authorities must work with local councils to facilitate developments. A number of the actions under objectives 5 and 6 in the Metropolitan Strategy indicate an understandable determination to expedite planning processes through the Planning System Review and the recently released White paper gives effect to this. While this is desirable, it must not be at the expense of the rights of local councils and their communities.

It is also imperative that developments, either in greenfield locations or renewal precincts are supported with adequate infrastructure and that this is done at least concurrently with developments, not years later as has too often been the case in the past. Action items 5.7 and 5.8 acknowledge this need but it must be supported with adequate Government funding.

Critically, local councils cannot be expected to bear the brunt of the cost of providing local infrastructure and references to the Local Infrastructure Renewal Scheme as the “delivery tool” in 5.8 leave doubts about the adequacy of proposed Government support.

## **Employment**

### **Quantity**

As indicated in the introductory comments above, WSROC seriously questions the Draft Metropolitan Strategy’s employment targets for Western Sydney.

Firstly, there are fundamental questions about how the employment targets were reached as no detail is given on this. What was the modelling on which these jobs targets were based?

Secondly, even if the target of 50% of all new jobs being in Western Sydney is achieved, this will still be critically short of what is needed. What is equally alarming is that the claims about helping to “...improve the distribution of jobs in Sydney” (p38) suggests that the Government fails to fully understand the requirements to achieve this.

Various estimates put the current Western Sydney job deficit at between 180,000 and 190,000. (An analysis of the 2005 Sydney Metropolitan Strategy by Cox Richardson put this figure at 182,000) That is, each day over 180,000 commuters from Western Sydney cram onto public transport or clog the roads heading eastwards for work, mostly to Sydney's CBD, North Sydney or Macquarie Park. The economic and social costs of long daily commutes on Western Sydney families, many of whom are in the lowest socio-economic strata, are considerable. So too, is the impact on Sydney's transport system and on the State's productivity.

Measures are needed to close Western Sydney's job deficit. Yet, rather than closing the deficit, the targets contained in the Metropolitan Strategy will see the situation deteriorate markedly. Despite its claims, the employment targets are not adequate to "...support the population growth that is expected in Western Sydney over the coming years." (p8)

As the Draft Metropolitan Strategy indicates, 70% of Sydney's population growth to 2031, 913,000 of the projected 1.3 million, is to be in Western Sydney – 89,000 in the West region, 355,000 in West Central and North West, and 469,000 in the South West region (pp 87, 93, 95). This means that if the region's job deficit is not to worsen, around 70% of employment growth also needs to be in Western Sydney (allowing for slight variations depending on demographics). Yet the Plan's employment target is only for a 50% increase in jobs in the region. Instead of 437,500 new jobs, (70% of 625,000) Western Sydney's target is only 313,000 (West 37,000, West Central and North West 142,000 and South West 134,000). This means that the region's already unacceptably high job deficit will grow by another 124,500 over the next twenty years.

An alternate analysis provides a slightly different figure but a similar outcome. The figures for 2006 show a Western Sydney workforce of 903,000 out of a population of 1,851,200 or 48.78% (*Metropolitan Plan 2036*, p133). Assuming for the moment the same workforce percentage, the Metropolitan Strategy's projected population of 2,915,000 for Western Sydney would require 1,421,937 jobs. Yet the projected figure for 2031 is only 1,119,000. This is a shortage 302,937 or an extra 122,937 over the current deficit of 180,000. It is acknowledged that demographic changes may alter this result slightly. An aging population and an increase in the proportion of children in the population may marginally reduce the workforce percentage. However, this will be partly offset by a continuation of the trend increase in the workforce participation rate, especially amongst females.

On either analysis, the result is similar. The Metropolitan Strategy's jobs target will result in Western Sydney's job deficit increasing by around 120,000, even if the target is reached.

There is absolutely no indication that Sydney's transport system, either public or private will be able to cope with another 120,000 commuters travelling from west to east each day - that is a 67% increase in the number of people daily leaving western Sydney on the roads and public transport system.

Billions of dollars are currently budgeted for transport improvements and this is necessary to improve the current unsustainable situation. However even the budgeted increases in expenditure will not nearly be adequate to support this massive increase in commuter numbers between now and 2031. The situation will deteriorate markedly. This will have profound social, economic, transport and environmental consequences not just for Western Sydney but for the whole city. This problem must be addressed as a matter of urgency.

### **Policy Priorities**

As the recently released ALGA State of the Regions 2012-2013 report by National Economics, argues, "...job decentralisation... still holds the key to affordable housing and commuter transport costs."(p26)

The three main locational components of employment are employment lands such as traditional industrial areas, newer business parks and warehousing/ logistics centres; major commercial and retail centres; and dispersed employment. The current breakdown of these components is as follows:

	<b>Strategic Centres</b>	<b>Employment Lands</b>	<b>Dispersed</b>
2006 Western Sydney	24%	37%	39%
Sydney Region	39%	23%	38%

## **Employment lands**

While the Draft Metropolitan Strategy for 2031 does not attempt to quantify the relative importance of these in twenty years' time, its emphasis in Objective 13 on the need to "Provide a well located supply of industrial land" is clearly central to reaching Sydney's jobs target. This is especially the case for Western Sydney.

As RDA Sydney concluded from its analyses, "...the jobs achieved in strategic centres and through natural growth will not meet the necessary employment targets and there will be a reliance on employment land to provide between 36% and 43% of the future jobs growth. Implementation efforts are essential". (Regional Development Australia Sydney, *Employment Lands Policy Position* 2012 p.2).

Given Western Sydney's reliance on manufacturing and logistics and its relative difficulty in generating professional jobs, this is probably even more marked for Western Sydney than for the whole of the Sydney region. In fact, the previous *Sydney Metropolitan Plan 2036* projected a figure of 47% of western Sydney jobs being in employment lands by 2036.

WSROC acknowledges the work of the Employment Lands Development Program and agrees with the ELDP's identification of "...a shortfall in the supply of undeveloped and serviced employment land." (p48) WSROC also acknowledges efforts by the Government in "... investigating expansion of the existing Western Sydney Employment Area to increase the supply of future industrial land to help meet supply benchmarks, provide much needed jobs in western Sydney, meet industry needs and keep industrial land prices competitive." (p48) However, WSROC is concerned that the Metropolitan Strategy seems to have done no analysis of the quantity of such land required and has no targets of the amount of such land to be serviced and released.

As indicated in WSROC's last submission *Sydney Over the Next Twenty Years*, analyses done by RDA Sydney (Regional Development Australia Sydney, *Employment Lands Policy Position*, 2012) and Penrith Business Alliance/Cox Richardson, (*Western Sydney Employment Land Investigation Area*, May 2012 ), concluded there will be a shortfall of 3,521 ha of employment lands even if all "Future Supply" and "Undeveloped Zoned Land" is developed during the next twenty five years.

Thus two imperatives must be addressed. Firstly, every effort must be made to facilitate the development of "Undeveloped Zoned Land" and "Future Supply" categories of land. This requires the provision of necessary infrastructure including water, sewerage and power as well as the necessary road and transport infrastructure to ensure this land is market-ready. A coordinated whole-of-government approach is needed to make sure this happens.

Secondly, every effort needs to be made to zone, service and develop the 3,500 - 4,000 ha in the Western Sydney Employment Lands Investigation Area in south-west Sydney. Assuming an employment ratio of 30 per ha, this has the potential to accommodate between 105,000 and 120,000 more jobs.

Thus WSROC supports the recommendations of the Sydney RDA that:

“Employment lands are so critical to the economic future of Greater Western Sydney that the Government should adopt an agreed Vision and Strategy for delivering over 8,000 ha on a rapid release program;” and in order to overcome the departmental “silo mentality”, that “the Minister for Western Sydney (The Hon Barry O’Farrell MP) establishes an ‘Implementation Committee’ for employment lands, reporting to a nominated Minister & chaired by an independent professional from the commercial sector to facilitate employment land supply in NSW.” (Regional Development Australia Sydney, *Employment Lands Policy Position*, 2012).

WSROC supports the Metropolitan Strategy’s commitment to “...careful structure planning to identify what parts of this (south-west) extension area could be developed for employment and how infrastructure needs to be staged” (p40) and acknowledges the structure planning that has occurred in planning for the Western Sydney Employment Lands.

WSROC also supports the Strategy’s proposed measures to protect existing supplies of industrial land and the Strategic Assessment Checklist (p49) to try and restrict the rezoning of such land.

An adequate supply of suitable land will not necessarily result in the economic development and job generation needed. WSROC acknowledges the Strategy’s support for the NSW Economic Development Framework and the need to support Industry Action Plans. Its support for actions which drive “... collaboration and development of integrated business networks... and... well-functioning industry clusters” is positive but lacks adequate detail about how this will work. The preparation of “Economic Development Plans for key precincts” (p41) is a helpful start but without details including private sector involvement, appropriate incentives “to encourage companies to locate in western Sydney” (p41) and the provision of enabling infrastructure, it is hard to gauge how successful these will be.

The Commonwealth-owned land at Badgerys Creek is relevant to this discussion. There is little doubt that an airport would be a major economic catalyst and job generator for Western Sydney. However, with or without an airport, the land there has potential use for a range of employment-generating activity. As the recently-released Joint Study on Aviation Capacity in the Sydney Region noted, “Given the time frames and the current planning of the adjacent areas, the best use of the site is for a majority of the land (at least 60 per cent) to be as employment lands with agribusiness in the short term and more manufacturing/industrial in the medium to longer term.” (p332).

A decision by the Federal Government in support of an airport on the site would of course mean significant job creation in the construction phase and even more direct and indirect jobs in its operation phase, as well as the attraction of aviation-related industries in the medium and longer term. However, any such decision would need to consider the views of western Sydney communities, and their elected representatives.

A critical issue for all employment lands is the need for supporting regional transport links. Even if serviced land is available, businesses will not relocate if transport links are not available to guarantee ready supply of inputs, ready access to markets and access for employees. This not only includes major infrastructure like the M7 and M4 but also the development of strategic link roads connecting employment lands to those motorways.

Closely related to this is the need for a fully developed and integrated freight system which incorporates essential rail links, including the Southern Sydney Freight Line and a Western Sydney Freight Line with strategically placed intermodals to facilitate the development in those employment lands. Planning for the development of a major intermodal at Eastern Creek should be a high priority in this regard.

## **Strategic Centres**

Employment policies which focus only on industrial development in employment lands will fail to deliver the quantity and diversity of employment needed in Western Sydney.

The generation of employment in existing urban centres is also needed. This has the big advantage of providing jobs close to public transport hubs and reducing reliance on private motor vehicles. While market forces may provide incentives for commercial activities in these centres, government policies have a part to play. This will require:

- Greater cooperation between the State Government and local councils and developers to remove impediments and facilitate redevelopment;
- As part of this, consideration of a greater role for JRPPs to remove some of the roadblocks to strategic regional developments;
- Assistance through concessions on stamp duty, payroll tax and other charges for strategically important developments;
- Other Government measures to provide greater certainty for investors, such as the Government's announcement last year of its intention to remove restrictions to leasing pre-commitment;
- Applying this by the appropriate pre-commitment of Government agencies to relocate significant numbers of their own staff to designated key Western Sydney commercial centres particularly Parramatta, Liverpool and Penrith but also to other centres in Western Sydney.

## **Diversity**

The other aspect of Western Sydney's employment needs which must be addressed is the diversity of employment. It is not just a matter of ensuring sufficient jobs for the region's projected population growth, but it is a matter of ensuring the right type of jobs.

It is encouraging that the Draft Metropolitan Strategy acknowledges "... the need for greater job diversity in Western Sydney". (p40) Currently Western Sydney is seriously under-represented in professional employment opportunities, providing only 17% of Sydney's banking, finance and business services jobs, but almost 60% of its manufacturing jobs (RDA Sydney Regional Plan for Sydney 2010). Over 30% of all western Sydney's jobs are in manufacturing, retail, construction, transport and warehousing. Because many of these industries are more subject to economic downturns and/or competition from overseas, exacerbated by the high Australian dollar, Western Sydney employees are more vulnerable to the threat of unemployment. Conversely, the comparatively low number of high level tertiary standard jobs means that a larger proportion of the region's highly qualified tertiary graduates must look outside the region to access suitable employment.

Business and professional jobs need to be attracted to suburban centres in Western Sydney to provide a better range of employment opportunities for its residents. While the Government can't force private enterprise to locate in the region, it can assist in providing the environment that encourages this.

The Government can also lead the way by relocating more of its own departments and agencies to Western Sydney particularly to regional cities such as Parramatta, Liverpool, Blacktown and Penrith. A larger presence of public sector professional employment would attract a range of commercial private sector support services, moving these centres closer to the critical mass where professional and commercial services become self-generating. This has happened in some instances, particularly with the relocation of several government agencies to Parramatta in the last two decades. The Draft Strategy does

recognise that “In some circumstances public sector job relocations will ... further encourage office development in strategic centres.” (p50) However, this needs to be more than words. It needs to be driven by determined measures to overcome the inertia that has prevented this happening on the scale that is needed. WSROC urges a focus on decentralisation driven by the Premiers’ office with defined targets of the percentage of government employees to be relocated to Western Sydney.

The other area of employment generation and diversity almost entirely missing in the Draft Metropolitan Strategy is the need to exploit the opportunities arising from the rapidly expanding digital economy and the rollout of the NBN. The recommendations of the Digital Economy Industry Action Plan need to be embraced with a view to supporting the take up by small and medium enterprises, developing smart work centres in outer metropolitan centres such as Blacktown, Liverpool and Penrith, teleworking and the dispersal of employment. The potential benefits for information sharing, creativity, productivity and transport dependency are significant.

Actionable policies need to be directed towards achieving pre-determined, staged goals in each key area and the results need to be measured against those targets. If they are not being achieved, policies need to be changed to ensure they are reached. As discussed above, the failure to generate sufficient jobs in Western Sydney has implications not just for Western Sydney residents, but for Sydney’s transport system and the liveability of the whole city.

## **Transport Infrastructure**

WSROC supports the Draft Metropolitan Strategy’s stated objectives 24, 25, 26 in relation to passenger transport, and objective 27 in relation to freight transport.

The integration of transport with planning is essential to the economic development of Sydney as well as to its liveability for its residents. Further commitment is needed for the two central ingredients to this:

- (1) the integration of transport infrastructure with housing and employment: the link between where people live and where they work. It is imperative that transport infrastructure is improved to facilitate the daily commute from home to places of work and study, especially for those residents on the outer urban fringes, such as outer Western Sydney. It is equally important that as far as possible, new housing is built close to existing public transport corridors.
- (2) freight infrastructure support for business: the links between inputs, workforce and markets. It is important that the freight transport system facilitates business access to supplies and to markets for their product, thus improving productivity and minimising costs. These factors, along with access for employees are important considerations in attracting businesses to Western Sydney.

For both passenger transport and freight, it is important that transport infrastructure assists in the diversification and decentralisation of Sydney’s economic and employment base rather than continuing the focus on travel and transport to and from a single, central CBD. As discussed above, if transport infrastructure merely tries to accommodate ever increasing numbers commuting from Western Sydney to the east - CBD, North Sydney and Macquarie Park - each day, it will never keep up.

Within that general framework, WSROC makes the following points about transport infrastructure in relation to the Draft Metropolitan Strategy.

### **1. Transport and Employment Growth.**

Investment in transport infrastructure must be designed to support the generation of jobs in Western Sydney by supporting business location in the region. Businesses will only locate where they can be

readily connected to supply chains, to product markets and to the employment market and where supporting infrastructure is adequate. This requires:

- an integrated and effective freight transport network with strategically placed intermodal terminals;
- more effective rail freight networks linking ports and intermodals to key industrial centres;
- strategic link roads connecting industrial and employment lands to major motorways;
- public transport connections (at least public buses) into major employment lands;
- rapid transit public transport into major commercial centres.

The Strategy's listing of the North West Rail Link, WestConnex, "options for a new light rail network focussed on Parramatta", and measures to "strengthen connections between Penrith, Liverpool and their subregional workforce" (p71) as priorities is positive. However, these must be supported by improved links with new release employment lands and with improved north-south cross regional transport links.

Thus WSROC supports the commitment to "develop an arterial road network for the Western Sydney Employment Area" (p72). It is essential that planning for this occurs in a time frame that stimulates the economic development of the region as early as soon as possible.

WSROC also supports other important links listed including the Erskine Park Link Road, Old Wallgrove Road and a Southern Link Road providing access to Horsley Park, Eastern Creek and Kemps Creek. It should also include work on others such as Reconciliation Road and the Prospect Highway.

It is also important that the WestConnex project is used to drive a major urban renewal project of Parramatta Road incorporating a high density mixed use residential/retail/commercial precinct.

## **2. Improved Public Transport.**

A stated target of NSW 2021, *A Plan to Make NSW Number One* is to "Increase the proportion of total journeys to work by public transport in the Sydney Metropolitan region to 28% by 2016". The benefits of this include increased economies for the rail system, reduced traffic congestion and its associated social and economic costs, reduced energy consumption and greenhouse gas emissions, a more sustainable transport system and improved activity and health levels as more residents walk or cycle to rail stations or bus terminals. These benefits are acknowledged by the Draft Metropolitan Strategy which aims to "...encourage actions to reduce car travel and improve public transport services". (p70) However, without the required investment in infrastructure and services this will remain an unfulfilled aspiration.

Projections by the Australian Government indicate that car traffic levels in Sydney in 2020 will be 33% higher than they were in 2002 resulting from a combination of the projected population increase and an increase of 7.9% in average VKT. (Federal Department of Sustainability, Environment, Water, Population and Communities, *State of Environment* 2006).

Yet as IPART noted, "There is considerable evidence that private cars impose substantial externality costs on the community in the form of environmental pollution, congestion and other such impacts. Therefore, by substituting for private cars, public transport creates an externality benefit associated with the avoidance of externality costs through having fewer trips made by private cars." (IPART *Review of CityRail Fares 2009-2012 Final Report*).

Based on figures from the Bureau of Transport Economics, the Metropolitan Strategy Review estimates that the cost of traffic congestion for Sydney will rise from \$4.6 billion a year in 2009 to \$7.8 billion a year by 2020. A 2005 study commissioned by the Sydney Morning Herald (Sydney's Transport Infrastructure – The Real Economics, Centre for International Economics, 2005) projected a 30% increase in accident costs, road subsidies and greenhouse gas emissions from \$4.75 billion to \$6.1 billion a year.

The Draft Metropolitan Strategy's policy that "Demand for car travel will be managed to reduce congestion and infrastructure costs" (p70) is commendable but it gives no detail as to how this will be achieved.

### **3. Public Transport Across Western Sydney.**

The inadequacies of public transport are felt even more keenly in western Sydney than in the rest of the city.

Investment in transport infrastructure in Western Sydney has not kept up with population growth. The result is that residential growth has been pushed further and further from rail networks, with an increasing reliance on buses and private cars. Yet bus services, either private or public have not kept up and have not been adequately integrated with rail services. In Western Sydney 60% of all trips are cross-regional but north-south public transport is almost non-existent for most Western Sydney residents and road systems are also, in many cases, grossly inadequate.

This produces the intolerable situation that residents in some of Western Sydney's towns who need to travel to other centres within the region by public transport must make ridiculously long (and costly) journeys. For example, someone living in Richmond and working in Penrith who doesn't have a car must catch a train from Richmond to Blacktown and then back to Penrith. The same problem applies to someone living in Penrith and working in Liverpool or Campbelltown.

Investment in public transport infrastructure for Greater Western Sydney must improve north-south travel within the region, particularly in the outer suburbs, while still improving travel to and from the CBD as well.

In terms of public transport, infrastructure priorities must include:

- rapid completion of the South West Rail Link;
- commencement of the North- West Rail Link, with an extension to the Richmond line;
- duplication of the Richmond line;
- the Epping to Parramatta rail line – either light rail or heavy rail;
- additional bus transit-ways on major use corridors;
- a network of strategically placed cross regional north-south public bus services;
- improved transport interchanges and car parking facilities at strategic rail stations;
- investigation of a proposed light rail network linking key centres in Western Sydney focussed on Parramatta.

The lack of public transport forces a high reliance on private motor vehicles. The high levels of car ownership in the region, coupled with the dispersion of employment opportunities and facilities and services contribute further to transport stress, the cost of living and the socio-economic disadvantage faced by many of Western Sydney's residents.

Research by UWS shows that 58.2% of the people living in transport disadvantaged areas are located in Western Sydney, with older people, those on lower incomes, and people with a disability among the groups most at risk.

Over 75% of Western Sydney workers commute by car and only 13% use public transport, so improving the efficiency of the road network is also critical for Western Sydney residents. For the large and growing number forced to use private motor vehicles, particularly for the daily commute, it is imperative that the capacity of key motorways is increased. The highest priorities must be the M4 east and the M5 duplication and WSROC accordingly supports the Government's commitment to WestConnex.

#### **4. Improved Transport Interchanges**

Evidence indicates that the quality or lack of quality of interchange facilities at stations can significantly affect the usage levels of public transport.

RailCorp's analysis of the modes of transport used by CityRail customers to access its railway stations shows that 46% walk, 12% arrive by bus, 14% drive and park and 17% are dropped at stations as private vehicle passengers ("kiss and ride"). (*A Compendium of CityRail Travel Statistics*, RailCorp June 2008.)

Therefore, "Interchanges can promote access to the public transport network with good waiting environments and fast transfers. But poor interchanges with long walks, stairs, poor travelling information and poor weather protection can substantially discourage access to public transport." (NSW Audit Office, 2007, *Connecting with Public Transport*).

Thus WSROC recommends targeted investment in interchanges, particularly at strategic rail stations, as a means of encouraging greater use of the rail system. Stations easily accessible from major roads and with ample low-cost land should provide substantial parking facilities to encourage "park and ride" commuting and all stations should be designed to facilitate "kiss and ride" usage. At many stations interchanges need to be improved to facilitate passenger transfer from buses to trains.

The provision of more car parks at strategic major bus stops would encourage park and ride commuting between outer suburbs and major centres. These options should be expanded for the most congested parts of major routes between Sydney's west and the CBD as well as centres such as Parramatta and Liverpool.

Investment also needs to address issues of safety and security, general appearance, cleanliness and amenity, adequate lighting, accessibility, the availability of weather protection, convenient signage and secure bicycle storage.

The use of bicycles for commuting in conjunction with public transport is very low in NSW compared with other states and territories, with combined bicycle/public transport accounting for only 0.6% of commuter trips at the time of the 2006 Census. However, these numbers are expected to grow and a stated aim of NSW 2021 is to "More than double the mode share of bicycle trips made in the Greater Sydney region, at a local and district level, by 2016."

The provision of secure and convenient bicycle parking facilities at stations is a prerequisite to encouraging multi-modal commuting, with the added advantage that "... parking space for bicycles etc., can be provided much more cheaply and efficiently than for cars, especially where land is

expensive or restricted.” (Independent Public Inquiry, Long-Term Public Transport Plan for Sydney Preliminary Report 2010)

While improved interchange facilities will not be the decisive factor for all who commute, improvements which make journeys more seamless will encourage greater use of public transport and the rail system in particular. If such facilities are not available, many will simply resort to using private motor vehicles for their whole journey.

Thus strategic investment in interchange facilities would assist with the policy objective of “greater use of public transport, walking and cycling.”(p70).

## **5. Freight Transport**

Improving the flow of freight across NSW is an economic and social imperative. As nearly 30% of Australian containerised imports arrive through Port Botany before they are transported to other locations, most in Western Sydney, freight movement must be a key focus of Sydney’s transport needs.

While Sydney’s population is growing at a little over 1% a year, container volumes through Port Botany have been growing by 7.5% since its inception, reaching 2 million TEUs last year. Projections indicate that this volume will double within the next ten years and increase by 3.5 times within twenty years. Air freight volumes are projected to increase by 85% over the same time. (NSW Government, *Port Botany and Sydney Airport Transport improvement Program*, 2011). The impact on Western Sydney will be disproportionately high given the central role of the M5 and M4 in the east-west connections from these gateways and the growing concentration of industrial, warehousing and freight distribution networks in Sydney’s west.

The economic cost of inefficient freight haulage, the wear and tear on major road infrastructure, the environmental and other external costs and the social cost of increasing numbers of heavy vehicles clogging Sydney’s roads, particularly the M5, necessitate urgent action.

The key priority must be to increase the proportion of freight which is carried by rail rather than road. The Government’s aim of doubling this proportion should be the bare minimum considering the low current base of only 14% (down from 22% ten years ago).

This requires the construction of efficient, high capacity intermodal terminals at strategic locations, particularly in Western Sydney, and the construction and/or upgrading of key rail linkages between those and Port Botany. Planning for the development of an intermodal at Eastern Creek along with immediate identification of a corridor for the Western Sydney Freight Line are essential components of this.

In addition, management measures are needed to increase the efficiency of existing road networks. Efforts must be made to reduce heavy freight traffic on major roads during peak times and a range of measures needs to be considered to achieve this. For example, this might be assisted by differential time-variable tolling charges, and/or gate charges at ports and intermodal terminals.

## **6. Long Term Corridor Planning.**

WSROC supports the commitment that “Corridors and sites for Sydney’s long term transport needs will be identified and protected for future generations” (p76). The rapid growth projected for Western Sydney means that even the medium term transport projects currently planned will be close to

capacity, if not inadequate by the time they are built. Planning must occur now to identify corridors for future infrastructure requirements and importantly, to quarantine those corridors so they are available when required. A failure to do so could result in substantial future land acquisition costs, create massive obstacles to infrastructure investment and substantially reduce the benefit/cost of future projects.

WSROC supports those corridors listed under Action 28.1. Key components of this must include provision for an outer Western Sydney orbital linking Campbelltown and Camden with Penrith and north to Richmond/Windsor) and extensions of the South-west Rail Link and the North-West Rail link with an eventual link up on the main Western line (perhaps at Werrington). The WestConnex motorway, F3 to M2 corridor and a north-south link between WestConnex and the M2, and provision for a link between the Bells Line of Road and the Sydney road network are also supported.

The identification of corridors to improve links between employment lands and local centres and residential areas is also needed and this rightly includes but should not be limited to the Marsden Park- Mt Druitt- Western Sydney Employment Area, the Leppington corridor and the Prospect highway listed in the Action 28.1.

As indicated above, corridor preservation must also provide for the completion of a Sydney freight rail network, particularly the construction of a Western Sydney Freight Line.

Regardless of the time frame of anticipated need for long term projects, if the preferred corridors are not identified now, subsequent development may render future infrastructure projects impossible. It is important that relevant councils are consulted in the process of the identification of these corridors in terms of the impact on their local communities and their own LEPs.

## **7. Virtual Connectivity**

One area that has received only very scant attention in the Draft Strategy, is the potential for virtual connectivity and its capacity to reduce the pressure on transport infrastructure. The establishment of smart work centres and the increase in telecommuting and mobile working, which combined with the rise of networked virtual companies and activity-based work organisations, could reduce the proportion of the population engaged in daily commuting, especially from outer areas during peak times. However, if this is to be significant enough to help to limit the growth in congestion costs a much greater focus is needed. WSROC urges a closer consideration of the Government's Industry Action Plan for the digital economy.

## **A Liveable City - Social Infrastructure**

No-one could argue with Objective 8 to "Create socially inclusive places that promote social, cultural and recreational opportunities" and WSROC supports the commitment that Growth Infrastructure Plans "...will address issues of social infrastructure provision in greenfield areas, ensuring new residents have access to opportunities as soon as they move in." (p34)

This will be an improvement on past practice in much of Western Sydney where the provision of infrastructure did not keep pace with population growth and residential development, despite the earlier Metropolitan Plan's commitment to providing infrastructure "...in a timely manner."

As the University of Western Sydney points out, "Decades of under-investment of policy and fiscal resources in Western Sydney by successive State and Federal governments have left many of the region's

cultural, social and environmental needs unmet. The legacy of this undernourished development includes mounting social and environmental problems, including hardening pockets of poverty and social exclusion, a dwindling and fraying public sphere and ever increasing ecological stress.” (UWS) Western Sydney’s Urban Frontiers Program: *A New Vision for Western Sydney – Options for 21st Century Governance*, April 2002)

Necessary infrastructure, both transport infrastructure and social infrastructure must be provided concurrently with development not years, or decades later as has often been the case. The issue of transport infrastructure has already been dealt with above. The failure of transport infrastructure to keep up with population growth and community needs in recent decades has:

- added to traffic congestion and the associated economic costs;
- reduced productivity and employment growth;
- produced adverse environmental consequences including air quality and greenhouse gas emissions;
- added to the cost of living of Sydney’s already most disadvantaged communities;
- increased the social exclusion and isolation of some communities.

In addition to transport infrastructure the provision of social infrastructure is equally important in determining the quality of life of local communities. Social infrastructure covers a range of facilities, some requiring investment in capital infrastructure backed up by a network of supporting services. The main areas of social infrastructure include:

- health services – both acute care and community health
- individual, family and community support
- educational facilities
- cultural facilities
- sporting and recreation facilities
- open spaces and parks
- housing
- community development
- employment and training
- legal services
- public safety infrastructure
- emergency services; and
- public and community transport.

Clearly these have a profound impact on the liveability of local communities and affect a range of variables including their quality of life, equity, law and order, justice, social stability and cohesion, perceived and actual safety and security, social well-being, levels of physical activity and active recreation, engagement in cultural activities, levels of public health and educational standards.

The provision of adequate social infrastructure is a key determinant of equity between different communities and across Sydney. One of the key stated objectives of the earlier discussion paper “Sydney Over the Next Twenty Years” was Providing Equitable Access to a Great Lifestyle, with the aim of ensuring Sydney becomes “...a city where everyone ... is given a fair go , with equal access to the social, recreational and economic opportunities the city offers”.

The commitment that “Health, education, cultural and social infrastructure will be planned for early in the growth and renewal process” and that “cultural, social and recreational infrastructure will be delivered across Sydney” (p34) is welcomed.

If this is to be achieved and if Sydney is to be a “Liveable City” for all its residents, determined and co-ordinated policy action is needed to address the inequities that currently exist in a number of key areas. Yet the Draft Metropolitan Strategy gives little indication as to how this will be achieved.

## 1. Socio-economic Disadvantage

As the Discussion Paper, acknowledges “...eight of the ten most disadvantaged areas of Sydney are in Western Sydney.” This situation is a product of a number of interacting factors including education, employment, family structure, disability and language difficulties.

As shown by the following figures, level of educational attainment are worse in Western Sydney than the rest of Sydney.

<b>Greater Western Sydney</b>	<b>Rest of Sydney</b>	
Year 12 or Better	42.1%	54.1%
Enrolled at University	9.4%	16.2%
University Degree	20.2%	28.6%

Employment levels are also worse, with average unemployment levels in Western Sydney around 1.5% higher than the rest of Sydney and pockets and with levels as high as 11%. Further, employment in Western Sydney is more concentrated in lower income areas such as manufacturing and retail than the rest of Sydney.

Language barriers are also more significant in Western Sydney with 40% of the region’s population being born overseas and in some LGAs, such as Fairfield (55%) and Auburn (60%), the rates are much higher.

A key focus of the Metropolitan Strategy and the way ahead for Sydney must be to reduce the levels of socio-economic advantage in Western Sydney. As part of a range of policies, this should include:

- Greater investment in education, with a determined focus on addressing language and cultural barriers;
- Specific programs aimed at increasing vocational education in schools and building better school-industry connections;
- School-based programs aimed at increasing rates of tertiary entrance;
- Policies to overcome Western Sydney’s transport disadvantage ;
- Policies to increase employment and diversity of employment in Western Sydney above).

## 2. Housing

Housing affordability issues have a greater impact on low income households than on those with higher incomes. Over 10% of Australians are experiencing housing stress and by definition (lower-middle income families paying more than 30% of their household income on recurrent housing costs) the incidence will be greater amongst lower income earners (NATSEM: *Housing Stress in Australia*

2007 University of Canberra, 2008). Thus the issue of access to affordable housing, either private or public, is a key one for Western Sydney.

As discussed above, a suite of measures is needed to increase the supply of housing, both public and private and to reduce the costs of buying a home. In addition to these across-the-board measures, targeted policies must require a component of affordable housing in every new development, both greenfield and in-fill. There is an urgent need for increased government investment in public housing to reduce the 60,000 on the state's public housing waiting list. This should also include provision for those with mobility problems including the aged and people with disabilities.

### 3. Health

Western Sydney is also seriously disadvantaged in terms of health. This is partly a result of the socio-economic factors discussed above but also because of inadequacies in the provision of health services. Average levels of obesity, poorer diets, sedentary lifestyles, diabetes, smoking, asthma, heart disease, malignant cancers and mental/behavioural problems are all more prevalent in low income households (ABS 2006 *National Health Survey : Summary of Results 2004-2005*). The consequence is higher mortality rates and lower life expectancy in the most disadvantaged areas. A study by NSW Health showed that across urban areas the average life expectancy for girls in the most disadvantaged areas was 7 years lower than for those in the most advantaged areas and for boys it was 10 years less. (NSW Health 2004 *Health and Equity Statement: In All Fairness: Increasing Health Equity Across NSW.*)

Poorer health outcomes are also a result of inequities in the provision of health services. On almost all indicators, access to health services is worse in Western Sydney than they are in the rest of Sydney.

	<b>Greater Western Sydney</b>	<b>Rest of Sydney</b>
Public hospital beds / 100,000	223.6	248.5
Number of residents per GP	1,049	754
Community Health facilities/100,000	1.67	1.98

(NSW Health (2010) *NSW Health Services Data Book 2008/2009*, <http://www.health.nsw.gov.au>  
Australian Government Department of Health and Ageing 2012, Primary Health Care Research and Information Service, Flinders University, SA)

Data on the *MyHospitals* website reinforces these results, showing that for the majority of surgical procedures waiting times are on average considerably longer in Western Sydney than they are in the rest of Sydney.

In addition to social infrastructure such as hospital beds and GP services, which directly impact on health outcomes, many other aspects of social infrastructure also impact on levels of health. The provision of community health centres, nutrition and dietician services, early childhood intervention services, family support services and counselling services affect preventative health, levels of chronic disease and long term life outcomes, particularly for the disadvantaged members of our community.

Serious investment is needed in those areas of social infrastructure which will change lifestyles and help reduce levels of preventative illness and chronic disease.

As the National Health Prevention Strategy states, – “Primary health care reform is the single most important strategy for improving our health and making the health system sustainable.”

Investment in social infrastructure, apart from the key areas of health and education, is easily seen as less critical than “harder” infrastructure such as transport. However, its impact on quality of life, levels of social inclusion/exclusion, social cohesion, level of crime, lifestyle and preventative health warrant a higher priority. WSROC maintains that as well as transport, social infrastructure provision must be a central part of the planning process, to be fully integrated with residential development and provided concurrently with it. This requires a place-based approach to planning, rather than an uncoordinated departmental-based silo approach.

A commitment to equity demands that a concerted effort be made to improve access to health services for residents of Western Sydney. As a minimum this requires:

- a widespread campaign on healthy living and preventative health, starting in our schools
- greater provision of primary health and early intervention services in Western Sydney
- considerable investment to reduce the backlog in hospital bed numbers in Western Sydney
- the provision of more internship places in public hospitals
- incentives to attract more GPs to practices in Western Sydney

## Agriculture

The lack of commitment to Sydney’s vital peri-urban agriculture industry in the Draft Metropolitan Strategy is a real concern. While one of the nine “City Shapers” listed in the Strategy identifies “Sydney’s Metropolitan Rural Area”, agriculture receives relatively little emphasis within it and of the 29 objectives in the Strategy, none specifically focuses on agriculture.

The Strategy does make the commitment that “rezoning for large scale housing proposals” (12) outside the Metropolitan Urban Area will be subject to the caveat that “there is no significant impact on productive agricultural land outside the Metro Urban Area.” However, this caveat is of little comfort when a significant percentage of Sydney’s most productive agricultural land is in the designated north west and southwest growth areas and the destruction of this vital resource continues.

Inexorable urban sprawl in recent decades has seen a steady decline in agricultural land in the Sydney basin. While changes in statistical methodology make it hard to obtain conclusive figures, best estimates are that the area under agriculture in the Sydney basin has diminished from around 100,000 ha in 1994 to 82,000 ha in 2007 (UWS Urban Research Centre, *Sydney’s Agricultural Lands : An Analysis*, 2010). Yet this is prime agricultural land and needs to be preserved for several reasons:

- In all, the value of Sydney’s agriculture is estimated at around \$1.5 billion with multiplier effects of probably two to three, making an important contribution to the Sydney economy.
- Sydney’s peri-urban agriculture is an essential component of Sydney’s food supply. The Sydney Metropolitan region contains accounts for 2.5% of the state’s land yet supplies 20% of NSW’s vegetables. With future uncertainties about possible climate effects on drier inland parts of the state, Sydney’s food security requires that Sydney basin output is retained, if not enhanced.
- This is highly productive land. The intensity of agricultural production has seen returns per hectare in the Sydney Basin of \$5,433, dramatically higher than the state’s average of \$136/Hectare (Knowd, et al, 2006, *Urban Agriculture: The New Frontier* p7).
- Access to locally grown food has the important benefits of freshness and relative cheapness (because transport costs are lower) and will be more likely to encourage healthy eating.

- Because distances are shorter, environmental costs of transporting produce to markets are lower.

The pressures on peri-urban agriculture come both from the demand side and the supply side. On the demand side is the continuing demand for greenfield sites for housing developments, spurred on by Sydney's growing population and the desire for at least a proportion of them for the traditional detached house on a quarter acre block, and by some for the semi-agricultural lifestyle on rural acreages on Sydney's outskirts. On the supply side, is the simple fact that agricultural activities rarely yield the returns that come with subdivision and residential development. For many farmers on Sydney's fringe, the potential for such development has often been seen as their future superannuation.

The 2010 *NSW Metropolitan Strategy Review* clearly identified threats to Sydney's agricultural land as a key issue, acknowledging that:

"...viable agricultural lands are facing continual pressures from alternative land uses and have a role in contributing to a sustainable future for Sydney. This is especially important given the expected population increases, projected housing needs, changing rainfall patterns and the increasing cost of transport." (Department of Planning, *Metropolitan Strategy Review* 2005).

The forerunner to the *Draft Metropolitan Strategy*, the discussion paper *Sydney Over the Next Twenty Years* seemed to echo this commitment, with stated aims to "...protect strategic agricultural land and improve agricultural productivity" and to "... map strategic agricultural lands and develop agriculture industry sector strategic plans" (p27).

Yet the current *Draft Metropolitan Strategy* appears to accord Sydney's peri-urban agriculture much less importance. This is a real concern, especially as designated north-west and south-west land release areas contain 40% of Sydney's most productive agricultural land and 50% of Sydney's identified vegetable farms ( P Malcolm and R Fahd, *Ground Truthing of the Sydney Vegetable Industry*, NSW Department of Primary Industries, Orange, 2009),

A suite of policies is needed to protect Sydney's valuable agriculture industry.

- A commitment to urban renewal and consolidation to provide the bulk of Sydney's extra housing needs thus minimising the encroachment into productive farming land.
- Where greenfield developments are planned, every effort must be made to ensure that they do not occur in high productivity agricultural land. To the extent that the currently identified growth areas include considerable amounts of such land, these plans need to be revisited and changes made to ensure that Sydney's valuable agricultural resources are not so easily surrendered.
- The Government needs to develop a Food and Agriculture Policy for the Sydney basin, based on comprehensive mapping of existing and potential high value agriculture, which is fully integrated with all other aspects of planning in order to ensure the protection of prime agricultural land.
- The State Government should work more closely with local Councils to develop more consistent approaches to agricultural zoning and development issues to ensure LEPs support agriculture.
- Consideration should be given to applying relevant parts of the SEPP (Rural Lands) to the Sydney Metropolitan Area to ensure greater Council consideration of rural impacts of development proposals. This would assist Local Government in resisting pressures to subdivide the most productive land.

- Simplification of the plethora of regulations applying to agriculture would reduce compliance costs and create greater certainty for agricultural activities.
- Improved communication with all new residents in farming areas (possibly with the issue of S149 planning certificates ) regarding the rightful needs of farming practices would reduce potential misunderstanding and conflict over activities which residents might consider noisy, smelly or unattractive and would strengthen Councils' ability to resist pressure to curtail legitimate farming activities.
- Workable water sharing arrangements must ensure adequate supplies for irrigated horticulture such as market gardens.
- Support for local farmers' markets and farm gate marketing (including the removal of impediments to such) will help support the economic viability of local agriculture.
- Broader support through research, marketing, transport and taxation policies would also help improve the viability of this essential sector.
- Consideration could be given to a system of Transferable Development Rights which would allow farmers to capitalise on the increased value of their land while at the same time retaining parts of it for agriculture.

## Healthy and Resilient Environment

The Strategy acknowledges that "urbanisation impacts Sydney's air quality, its waterways and biodiversity:" (p58) and rightly acknowledges that "...we must do more to assess the environmental consequences of planning choices and city structure." However, specific policies and actions are very limited.

The impacts of Sydney's development are felt across Sydney, but on a number of indicators, more so in Western Sydney and the Draft Metropolitan Strategy does at least recognise this in relation to air quality issues. The projected population growth over the next twenty years which will see 70% of the city's new population living in Greater Western Sydney, means that how we deal with that growth will have profound implications for the environmental sustainability not only of Western Sydney, but of the whole city.

### Air Quality

WSROC agrees that a key to achieving Objective 21 , to improve air quality, is "... integrated land use and transport planning" (p63)

Efforts are needed to at least slow the rate of growth of motor vehicle usage and its impact, not only on greenhouse gas emissions but also on other pollutants.

Motor vehicles contribute approximately 7% of total greenhouse gas emissions (Australian Parliamentary Library How Much Australia Emits), up to 70% of nitrogen oxides, and are a major contributor to photochemical smog and ozone. The geographical structure of the Sydney basin means that residents in Western Sydney, particularly south-western Sydney are the most affected by poor air quality. Residential developments which reduce the dependence on private motor vehicles should help reduce the growth in these pollutants.

Projections by the Australian Government suggest that car traffic levels in Sydney in 2020 will be 33% higher than they were in 2002 resulting from a combination of the projected population increase and an increase of 7.9% in average vehicle kilometres travelled. This will bring with it significant impacts in terms of carbon emissions but also other air pollutants.

As IPART noted: “There is considerable evidence that private cars impose substantial externality costs on the community in the form of environmental pollution, congestion and other such impacts.” (IPART *Review of CityRail Fares 2009-2012 Final Report 2008*).

The Draft Metropolitan Strategy itself acknowledges a cost of up to \$6 billion a year from “particulate air pollution” (p63) yet is much less specific in measures to address the problem. Surely, if cost are so high they must warrant significant investment to ameliorate those costs.

Amongst a range of necessary policy responses there are three clear imperatives.

The first is to ensure that planning is focussed as much as possible on urban consolidation along existing public transport corridors. Where it involves greenfield development this must as far as possible be close to existing public transport links or where they can be relatively easily provided.

The second is to improve public transport systems, particularly across Western Sydney where private motor vehicle usage is greatest and is growing the fastest.

The third, as discussed above, is the need to generate more employment near to where people live, thus reducing commuting distances and the associated environmental (as well as financial) costs.

The Strategy does declare its aim for “... integrated land use and transport planning (which) will help reduce exposure to air pollution and improve local air quality.” (p63) However, any detailed policy and action plans are sadly lacking, casting significant doubt on the likelihood of achieving this aim.

## **Water**

Objective 22 clearly recognises the threat to both Sydney’s water supply and the health of its waterways.

Projected population growth and developments, particularly in the south-west growth sector will impact on the already degraded Hawkesbury –Nepean catchment. The high nutrient levels, particularly phosphates and nitrates, partly as a result of stormwater runoff and run-off from agriculture, but more from the treated effluent from the large number of sewerage treatment plants in the catchment, have seriously affected the water quality in the river. Apart from health implications, this has at time created significant problems with extensive aquatic weed infestations with impacts on the local tourism industry and on downstream aquaculture. “Elevated nutrient levels and reduced river flows are the two major factors contributing to algal blooms and excessive aquatic weed growth, which hamper recreation and commercial uses of the river and affect aquatic life.” (*Lower Hawkesbury Nepean Nutrient Management Strategy*, Department of Environment, Climate Change and Water 2010).

The impact of a large increase in housing within the catchment cannot be completely avoided, but a number of measures are required as a minimum, particularly to reduce the level of nutrients entering waterways which is identified as a priority in the Hawkesbury-Nepean Catchment Action Plan and River Health Strategy.

- The implementation of an integrated catchment-wide framework to prioritise and coordinate policies to reduce nutrient flows;
- Co-ordinated work with the agriculture industry to reduce farm-based nutrient run-off;
- Measures to reduce stormwater run-off into the river system;
- The implementation of a regime of environmental flows from dams and major weirs;
- Measures to ensure that all STPs within the catchment are upgraded to maximum efficiency;
- Measures to significantly increase the total volume of recycled water within the catchment

but also throughout in Sydney to reduce the pressure on flows in the river;

- Measures to ensure the minimisation of land clearing and the removal of vegetation
- Strategic riparian zone revegetation in degraded areas.

Most of these measures also need to apply to the Sydney catchment system. The Parramatta River and the Georges River catchments, both included in the responsibilities of the Sydney Metropolitan Sydney Catchment Authority cover large parts of the Sydney basin and include significant parts of Western Sydney. Issues such as resource conservation, protecting vulnerable ecosystems and biodiversity, reduction in invasive species, ensuring water quality, recycling, stormwater management and runoff have an impact on the environment throughout the Sydney basin.

WSROC supports the commitment of the Draft Metropolitan Strategy that “water cycle management will be integrated into strategic planning decisions including growth infrastructure planning” (p64). However, much greater detail is needed on how this will work. If recent practice is a guide, a lot more work needs to be done on this.

Support for the HNCMA and the SMCMA and their catchment action plans is essential to minimising our ecological footprint and ensuring the sustainability of Sydney over the next twenty years.

### **Bio-diversity**

Objective 23 recognises the threat to Sydney’s biodiversity and particularly threats to the Cumberland Plain.

This reinforces the need to reduce the rate of land clearing, again with implications for greenfield developments versus infill development. Residential developments which reduce the rate of urban sprawl will reduce the rate of land clearing, the removal of carbon sinks and threats to biodiversity through the removal of remnant Cumberland Plain woodland, listed as an endangered ecological community under the 1995 NSW Threatened Species Conservation Act.

The NSW National Parks and Wildlife Service identifies “Clearing for agriculture and urban development (as) the greatest threat to Cumberland Plain Woodland.” (NPWS website)

The establishment of the Western Sydney Parklands is a welcome initiative. While it is accepted that these Parklands carry a range of uses, including commercial activities, and while it is understood that the Charter of the Parklands require them to be self-funding, it is important that the environmental integrity of the Parklands is maintained and that remnant Cumberland Plain bushland within these Parklands is protected. Policies are also needed to protect other areas of Cumberland Plain woodland outside the Parklands.

### **Climate Change**

WSROC supports Objective 20 and the need to minimise potential impacts of climate change on local communities. The Sydney Adaption Strategy which is being prepared by the Department of Planning and Infrastructure in conjunction with the Office of Environment and Heritage and SCCG and WSROC is working on a range of strategies to reduce Sydney’s vulnerability to a range of extreme weather events including extreme heat days, bushfires and flooding which may result from climate change. WSROC also welcomes the Hawkesbury-Nepean Valley Flood Management Review being undertaken by the NSW Office of Water.

WSROC also welcomes the commitment to “... better designed neighbourhoods and buildings (to) improve our ability to cope with climate change impacts” and “... increased green cover (to) improve air

quality, reduce the impact of heatwaves and help manage energy demand” (p62) but much greater detail is needed on how these guidelines will be applied and how new initiatives will be funded.

There is little doubt about the need to ensure development and planning policies focus on the impacts of the nature of the built environment on micro-climate. Regardless of possible impacts of climate change, rising temperatures and heat island effects have been impacting significantly on Western Sydney because of the nature of development in recent decades. Since 1965 Western Sydney has experienced almost a 200% increase in the number of days over 35°C while the city itself has only experienced a 22% increase (Greening Australia). While this difference is largely due to the moderating effects of coastal locations, the impact in Western Sydney has been exacerbated by land clearing and the replacement of vegetation with hard surfaces such as buildings and roads.

Planning for population growth and future development needs to minimise the loss of vegetation and needs to give careful consideration to the types of surfaces created and materials used as well as to the development of heat sinks through the creation of ample green spaces and waterways, riparian zone revegetation and rehabilitation of degraded landscapes.

## **Sub-Regions**

WSROC broadly supports the identification of the six sub-regions as a useful tool to help identify their priorities and to give more focus on the integration of housing, transport and employment in those sub-regions. While there has been significant debate about the selection of those sub-regions and the grouping of Local Government Areas within them, it is understood that no grouping is ideal. Perhaps the biggest anomaly from Western Sydney’s point of view is the inclusion of Bankstown and Fairfield (and possibly Liverpool) with the outer South- Western Sydney growth councils of Camden, Campbelltown and Wollondilly. These two groups might be better separated.

More important than the delineation of sub-regional boundaries, is the appreciation of the key issues and the planning imperatives within each region. Economic drivers and catchments operate across artificial borders as do transport linkages. Environmental issues are undoubtedly more catchment related than dependent on local government boundaries. Thus the need for “Subregional planning (to) identify and plan for any strategic cross-boundary issues and opportunities” (p80) is recognised by the Draft Metropolitan Strategy.

It is not WSROC’s intention in this submission to give a detailed individual response for each of the centres and priorities listed for the three sub-regions as individual councils within each sub-region will be doing this.

However, it is worthwhile to comment briefly on the Metropolitan Priorities listed for each sub-region.

### **West Central and North West**

#### **Metropolitan Priorities**

- WSROC acknowledges the place accorded to Parramatta as Sydney’s second CBD and its impact on economic development in the whole Western Sydney region, but it is important that policies also support commercial development in other key centres as shown.
- WSROC supports the planned Urban Activation Precincts along the Parramatta Road corridor as well as at Epping and would encourage the investigation of others besides those nominated. As argued above, urban renewal and consolidation along public transport corridors should take a large share of the planned growth in housing.

- Planning in the north-west must also include mixed use development with higher density housing precincts along the North West Rail Link corridor and around planned stations.
- This sub-region will experience a growing employment deficit over the next two decades, with population expected to rise by 42% and employment by only 37%. This reinforces the need to focus on employment-generating policies.
- Manufacturing in existing precincts including Holroyd and the arc through to the south-west subregion and the newer Western Sydney Employment Area need to be supported given the challenges currently faced by Australian manufacturing. This must include the construction of a major Eastern Creek intermodal terminal connected to Port Botany by a Western Sydney Freight Line.
- The proposed extension of the Global Sydney arc to Parramatta and the Norwest Business Park is supported as a positive development which will help generate professional jobs needed to diversify the region's employment base.
- The list of priorities rightly includes strengthening sub-regional transport and while WSROC agrees with those listed, particularly in relation to Parramatta CBD, they must also include public transport linkages across the subregion and connections to the other Western Sydney sub-regions. This should at least include an expansion of the public bus network into current Western Sydney Employment lands and the Norwest Business Park as well as the planned Marsden Park Business Park.
- WSROC supports the Western Sydney Light Rail project being proposed by Parramatta Council and urges Government support for the next stage of feasibility analysis.

## **West**

### **Metropolitan Priorities**

- The growth projected by this sub-region is slower than for the other two in Western Sydney, with population expected to grow by 27% and employment by 31%. As such, this is the one sub-region in Western Sydney whose job deficit will not worsen over the next two decades if the employment targets are realistic and are actually reached. However, there is no indication of how these targets have been derived and how realistic they are. Even if they are reachable, this is no reason for complacency as employment growth in the sub-region is needed to meet the needs of the burgeoning population in the wider Western Sydney region.
- Residential development in the sub-region must include an appropriate mix of higher density housing in or near centres and public transport routes so the burden is not borne overwhelmingly by greenfield development and its associated problems discussed above.
- Again, while the growth in manufacturing in the employment lands is valuable, it is still relatively low density and greater focus is needed on higher density and higher order job creation. Support needs to be given to Penrith's growth as a sub-regional commercial centre as well as for its Health and Education Precinct.
- The stated priorities acknowledge the importance of the region for tourism, particularly the Blue Mountains World Heritage Area and the Hawkesbury –Nepean Valley . However, these valuable natural assets need significantly increased government support for their maintenance as state and national assets and for their potential tourism benefits to be achieved. The burden should not fall on the councils in whose LGAs they are located.
- The threat of widespread and devastating flooding is always imminent and it is imperative that the commitment to “ support flood mitigation measures in the Hawkesbury-Nepean Valley” is

delivered. The recommendations of Hawkesbury-Nepean Valley Flood Management Review currently being undertaken by the NSW Office of Water must be followed up with the resources necessary for their implementation.

- WSROC supports the recognition of “...agricultural ... lands as important assets for food production and broader economic contribution” and as argued above, these must be protected from decimation due to urban sprawl.
- WSROC supports the investigation of corridors for an Outer Orbital Motorway and for a potential Bells Line of Road motorway corridor and urges that the corridor identification and preservation occurs before further residential development renders this impossible. The outer orbital corridor also needs to include planning for a long term rail connection which connects the South West Rail Link with the North West Rail Link via the main western line.

## **South West**

### **Metropolitan Priorities**

- It is a concern that none of the nine “City Shapers” focus on the south-west, perhaps suggesting a lack of conviction about the significance of the sub-region in Sydney’s economic development, despite the fact that it will house the largest proportion of the city’s population increase.
- The south-west will suffer more than the other two sub-regions from a growing job deficit, with population projected to grow by 57% and jobs to grow by only 45%. This means that measures to increase economic development and job growth are critical. There is no indication of how the sub-region’s employment targets were derived, how realistic they are and what significant projects could help achieve them.
- While a number of general comments are made about supporting the sub-region’s “long term growth and development” and “new local employment growth in the South-West growth centre”, there is no detail about strategies, how this will happen, and what support would be provided by the Government.
- WSROC welcomes the Draft Strategy’s commitment to “support other specialised clusters associated with the (Bankstown) airport” but further detail is needed on the nature of such support.
- For reasons listed above, WSROC supports “urban renewal in strategic centres around transport hubs” but more detail is needed on how this will occur and how it will fit with current planning of the affected councils.
- The commitment to “recognise the subregion’s agriculture” needs to be backed up with specific measures which will prevent greenfield development consuming large areas of productive farmland. This seems to be seriously lacking.
- The priority to “...provide extensive environmental recreation and tourism opportunities” is meaningless without details of how this will be achieved.
- WSROC supports the commitment to “protect land to serve Sydney’s future transport needs”. This must include early identification and preservation of the corridor for an outer Sydney orbital (M9) and also for the eventual northwards extension of the South West Rail Link to join the main western line and the North West Rail Link.

## CONCLUSION

Greater Western Sydney will take the major share of Sydney's population growth over the next two years and along with this will face a major proportion of the city's challenges. It is essential for the liveability and productivity, not just of Western Sydney, but of Sydney as a whole, that these challenges are addressed.

In summary these challenges are:

- the need to increase the supply, variety and affordability of housing with an emphasis on urban renewal rather than greenfield development
- the need for more integrated planning which increases the quantity and diversity of jobs in Western Sydney to close its jobs deficit and support its population growth
- the need for improved, integrated transport, both public and private, which better links housing development with employment and better supports the economic development of Western Sydney
- the need for the identification and preservation of future transport corridors
- the need for a full range of social infrastructure investment to ensure quality of life for Western Sydney residents and to reduce the inequity much of the region has suffered in the past
- the need to protect Sydney's threatened peri-urban agricultural resources to ensure Sydney's food security
- the need to protect our environment and ensure that any development is environmentally sustainable.

The Draft Metropolitan Strategy appears to recognise these challenges but requires much greater detail on strategies for their implementation. The effectiveness with which they are addressed will determine the liveability, productivity and prosperity of Sydney for decades to come.