

Submission to the Greater Sydney Commission on the Draft Greater Sydney Region Plan and Draft Sydney District Plans

Prepared by **Urban Taskforce Australia**, December 2017

1 EXECUTIVE SUMMARY

The Urban Taskforce congratulates the Greater Sydney Commission on the extensive work that has gone into the 40-year plan for Sydney and the five 20-year district plans. It is vital that a city the size of the Sydney metropolitan area has a clear plan to guide development into the future. It is also vital that there is a link between the proposed locations for new housing and jobs and the infrastructure that will support the new development. The NSW Government's commitment to a metro rail network across Sydney is the most critical enabler of where new growth should be located and we fully support ensuring significant development does occur around stations along these new rail corridors. We also support the concept of the three cities along with a hierarchy of centres that defines Greater Sydney as a polycentric city. The 30-minute travel time to strategic centres is also supported as is the game changing role of the Western Sydney airport at Badgerys Creek.

There are however a number of areas where the Urban Taskforce believes the suite of planning documents should be amended to give a realistic structure for the city's growth. Our concern is that the documents seem to be pitched towards a community that is worried about the significant changes that must occur in Sydney. We believe there needs to be a stronger role taken by the Greater Sydney Commission in its plans to lead the discussion about the inevitable growth that is coming to Sydney. Below we have outlined where we believe the key messages or policies can be strengthened. We have then indicated where Urban Taskforce research projects and publications add more detail.

1.1. SYDNEY WILL BE AN URBAN CITY RATHER THAN A SUBURBAN CITY IN 40 YEARS TIME

The biggest change Sydney will have over 40 years will be the move away from the detached house and large backyards as the predominant way Sydneysiders live. The 2016 census indicates that currently 55 percent of homes in Sydney are detached (with 30 percent apartments and 14 percent townhouses). By 2057 demographic researchers McCrindle estimate that detached homes will have dropped to being only 25 percent of homes (50 percent apartments and 25 percent townhouses)¹, as demonstrated in Figure 2. Clearly this shift to urban living is already underway and it is creating tensions in some communities. The Greater Sydney Commission and the NSW Government must champion the positive aspects of the urban lifestyles that 75 percent of Sydneysiders will have in 40 years' time.

The Urban Taskforce engaged social demography and research firm McCrindle to analyse this swing to urban living and the characteristics of the people who chose to live a more urban lifestyle, our findings are available in the report [Sydney Lifestyle Study – Redefining Sydney's urban lifestyles](#).

¹ Urban Taskforce Australia / McCrindle, [Sydney Lifestyle Study – Redefining Sydney's urban lifestyles](#), December 2017

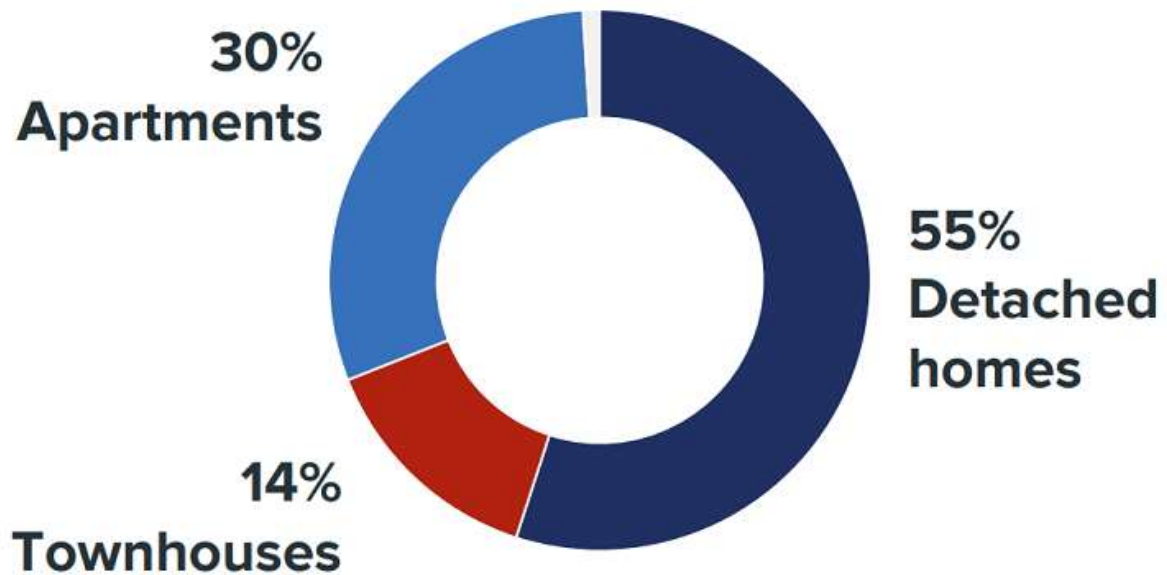


Figure 1: Sydney Dwelling Structure, 2017 (McCrindle, 2017)

Note: remaining 1% of dwellings are classified as 'other')

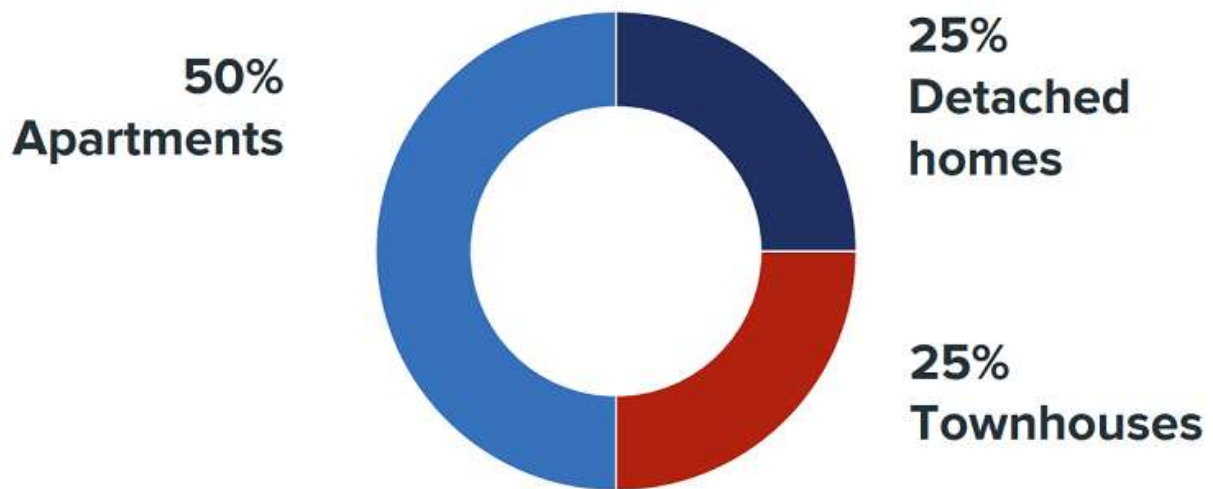


Figure 2 Sydney Dwelling Structure (Projected, 2057) (McCrindle 2017)

1.2. MIXED USES WILL BE THE NORM ACROSS SYDNEY

The days of planners separating uses out into coloured zones on maps are rapidly fading. The vision of American urbanist, Jane Jacobs, for a dynamic mixed-use character for cities is the way of

the future. The Commission's plans do not sufficiently champion mixed-use urban precincts. The plans actually work against a mixture of uses by prohibiting high rise residential from strategic centres and by banning the rezoning and renewal of largely redundant inner-city industrial sites. We understand the need to encourage jobs in the right locations but we believe that jobs and residential uses can coexist to the benefit of both. The District Plans seem to be biased against residential uses in a number of areas where the development industry believes the market is looking for a mixed-use cosmopolitan urban environment. The Urban Taskforce has issued a research publication on mixed-use development, [Mixed use is in the urban future](#), (September 2016).

1.3. AFFORDABLE HOUSING POLICIES NEED STRONGER LEADERSHIP

The Urban Taskforce supports the general direction of the Commission's approach to affordable housing where a 5 to 10 percent target is applied only on uplift with rezoning, only in certain locations and only where economically feasible. The Commission's plans however then ask each council to develop their own approach to the provision of affordable housing, which has led to council's developing their own targets, for example the Inner West Council proposes a 30% affordable housing target on all new housing. There seems to be a feeding frenzy from councils to levy new housing excessive amounts of money for affordable housing. The end result will be to dramatically increase the cost of the majority of new housing. The popular position seems to be to make the developer responsible for delivering free housing with no compensation.

The Commission must provide leadership and require councils to adhere to the Commission's approach to affordable housing.

The Urban Taskforce believes that an incentive based approach is required. We have developed an affordable housing policy which uses incentives to create a steady and sustainable supply of affordable rental housing, [How to supply 40,000 affordable homes in Sydney in 10 years](#).

2. DETAILED COMMENTS

2.1. THE REAL 'GAME CHANGER' FOR SYDNEY IS THE TREND TOWARDS HIGHER-DENSITY APARTMENT LIVING

The Greater Sydney Commission has frequently cited the importance of 'game changers' for the future of Sydney^[1]. Various 'game changers' have been identified – the creation of the Greater Sydney Commission, the new 'three cities' spatial paradigm, the '30-minute city' and the opportunity to develop an 'aerotropolis' by leveraging off the new Western Sydney Airport.

Comment:

[1] 2016 PIA Kemsley Oration, 452 Flinders Street Melbourne, Speech by Sarah Hill MPIA, CEO Greater Sydney Commission, available [here](#)

These are all meaningful and important game changes which will play key roles in the future of Sydney. However, the Urban Taskforce believes that from a broader perspective the real 'game changer' for Sydney will be the swing towards apartment living, and how this trend can be used to develop a productive, sustainable and socially just global Sydney.

Australian Bureau of Statistics figures indicate that the swing towards apartment living in Australian cities is a real and credible trend. There is a cultural shift to favour location over dwelling size. This, combined with the geographic limits to development in Sydney – Sydney Harbour and surrounding national parks, means that Sydney must grow up, not out.

In the five years between the 2011 census and the 2016 census Australia's capital cities have grown by 10.5 percent compared to the rest of the country at 5.7 percent. Two thirds of Australians now live in our capital cities with Sydney and Melbourne being the largest.

The swing to a more urban population is also clearly demonstrated by the growth in the number of people now living in urban apartments. In 2011 Sydney's apartment dwellers were 25.8 percent of home dwellers and this has grown to 28.1 percent in the 2016 census. With around 70 percent of all dwellings constructed in Sydney over the last year being apartments the percentage of dwellings that are apartments will continue to grow.

As Sydney's population increases over the next 40 years, it is likely it will become a city of 8 million people. This is the same size as the current populations of London and New York so it is essential that the *Draft Greater Sydney Region Plan* provides clear guidance on how Sydney will accommodate this growth and evolve into higher-density city in the future.

The swing to apartment living will inevitably lead to greater density in the Sydney region and these will be mainly in apartment buildings located around railway stations. Just like the impressive Metro and Subway rail systems of New York and London, Sydney will need to develop sophisticated metro rail networks to underpin where future densities are located. We acknowledge the excellent work the Coalition Government has done in delivering additional transport networks, including the Norwest Metro, Sydney Metro and Sydney Light Rail, and valuable roadways such as WestConnex.

The *Draft Greater Sydney District Plan* does not clearly articulate the need for a higher-density urban form, or highlight the many benefits of higher-density urban living.

The Greater Sydney Commission, through the *Draft Greater Sydney District Plan* and the Draft District Plans, must take on the difficult role of championing the necessity and benefits of higher-density urban living to the population of Sydney. Housing must be built at higher densities to preserve bushland, open space and parks and preserve space for essential infrastructure such as schools. Such broad-based educational efforts are needed to alter attitudes about higher-density projects. These efforts should emphasize that well-designed higher-density urban environments can be attracted, well integrated into the existing streetscape and provide a cosmopolitan lifestyle close to shops, parks, restaurants and transport.

Recommendation:

- **The Greater Sydney Commission undertake a public education campaign and actively champion well-designed high-density precincts and developments**

- **The Draft Greater Sydney Metropolitan Plan and Draft District Plans be revised to include:**
 - **Acknowledgement of the need for a higher-density urban environment in the Sydney Metropolitan area**
 - **The environmental, social and economic benefits of higher-density urban living**
 - **Additional objectives, actions and directions to specifically address the shift towards higher-density urban environments which will take place throughout Sydney in the coming years.**

2.2. PREPARATION OF HOUSING STRATEGIES

P52 of the *Draft Greater Sydney District Plan* states that housing strategies are to be prepared by councils and given effect through amendments to the local environmental plan. These strategies must identify where in their local government area the 0-5 year and 6-10-year housing targets would be most appropriately applied.

The Draft Plan states on page 55 '*Action 2: Prepare housing strategies – Updated local environmental plans that respond to housing strategies are to be submitted within three years of the finalisation of the district plans, or two years in the case of priority councils where funding has been provided.*'. These strategies must identify where in their local government area the 0-5 year and 6-10-year housing targets would be most appropriately applied.

Comment:

We fear that certain anti-growth councils may delay or prolong preparation of a housing strategy in order to defer approving or assessing rezonings or development applications which introduce additional housing to their local government area. We request that the Greater Sydney Commission monitor councils to ensure they are on track to deliver their housing strategies and local environmental plans within this time frame.

Preparation of the housing strategies and amendments to the local environmental plans must not be a reason to cease or delay processing of rezoning and development applications. The Greater Sydney Commission must monitor councils to ensure that councils continue development assessment and rezoning in a timely and efficient manner. If necessary, additional resources should be supplied to councils to ensure they are sufficiently resourced to undertake this extra work without affecting business-as-usual planning work.

Recommendation:

- **The Urban Taskforce request that the Greater Sydney Commission monitor councils to ensure Housing Strategies are prepared in a timely manner.**
- **Additional resources should be allocated to busy councils to ensure rezonings, development assessment and other key planning processes can continue during**

the preparation of the housing strategies and associated amendments to local environment plans.

2.3. PLANNING CIRCULAR AND GUIDELINES TO PREPARE HOUSING STRATEGIES

P59 states 'A new planning circular and guidelines to be prepared by the NSW Department of Planning and Environment' to guide key technical aspects of preparing a housing strategy. Key aspects will include capacity, viability, good design, mix, supply and affordable rental and social housing.

Comment:

The Planning Circular and guidelines must give adequate consideration to the financial viability of housing development.

We also request the Department expedite the preparation of these documents to ensure they are ready for councils to use to prepare their housing strategies once the Draft District Plans are finalised.

Recommendations:

- **We request that the Department consult with interested stakeholders, including the property development industry, when preparing the planning circular and guidelines.**
- **The Department should ensure the Planning Circular and Guidelines are finalised and ready for Councils to use by the time the Draft District Plans are finalised to ensure there is no reason for councils to delay preparing their Housing Strategies.**

2.4. DEFINITION OF 'AFFORDABLE HOUSING' MUST BE UPDATED

Page 58 of the Draft Greater Sydney Region Plan states:

This draft Plan identifies the most vulnerable households (the low to very low-income households) as eligible for housing secured by Affordable Rental Housing Targets.

Comments:

The definition adopted by the Commission in relation to 'affordable housing' is inconsistent with other definitions used by local, state and federal governments.

The Urban Taskforce considers the definition used by the National Rental Assistance Scheme (NRAS) is the most appropriate.

NRAS increases the supply of affordable rental dwellings and reduces rental costs for low and moderate-income households by encouraging large-scale investment in affordable rental housing through tax incentives. In order to take advantage of these incentives, participants in the scheme must provide housing that is rented out at a rate that is at least 20% less than the market value rent for the dwelling, and must be used for affordable rental housing for at least 10 years.

Income limits for eligible tenants are based on the gross income of each household and accommodate a range of low to moderate income earners. Income limits for the 2017-18 financial year are presented below. These are indexed yearly.

Household composition	Household income limits
One adult	\$49,547
Two adults	\$68,501
Three adults	\$87,455
Four adults	\$106,409
Sole parent with one child	\$68,548
Sole parent with two children	\$84,983
Sole parent with three children	\$101,418
Couple with one child	\$84,936
Couple with two children	\$101,371
Couple with three children	\$117,806

Table 1: 2017-18 income eligibility requirements, Source: [Department of Social Services](#)

We believe that this incentive based approach can produce a significant amount of affordable rental dwellings in a relatively short period of time, and would prove far more successful than an 'inclusionary zoning' approach.

Recommendation:

- **We request the Greater Sydney Commission change the affordable housing requirements contained in the Draft Plans by adopting the income eligibility requirements of the National Rental Assistance Scheme, rented at a rate that is at least 20% below market value rent.**

2.5. AFFORDABLE HOUSING TARGETS FOR GOVERNMENT-OWNED LAND

Page 60 of the *Draft Greater Sydney Regional Plan* states: *State agencies, when disposing of or developing surplus land for residential or mixed-use projects include, where viable, a range of initiatives to address housing diversity and/or affordable rental housing.*

Comment:

The provision of affordable housing is a critical issue for the future growth and development of Sydney as a global city. The NSW Government should ensure that delivery of a sufficient number of affordable dwellings is provided by placing affordable housing targets on any land redeveloped by the government.

This has been discussed frequently but unfortunately not acted upon. The Greater Sydney Commission, in conjunction with other relevant government agencies, should demonstrate leadership on this issue and develop an appropriate affordable housing target applicable to the development of government owned land.

Recommendation:

- **The Greater Sydney Commission must work with relevant agencies to develop an appropriate affordable housing target when disposing of or re-developing government-owned land.**

2.6. METRICS TO MEASURE HOUSING TARGETS

Page 36 of the Draft Greater Sydney Region Plan states the Metric for measuring the progress of delivering the Directions for the 'Livability' aspects of the Draft Plan.

These metrics are:

- Number of councils on track to deliver housing targets
- Number of councils with schemes that implement Affordable Rental Housing Targets.

Comment:

More detail on how councils will be assessed to be 'on track' to deliver housing targets is needed. Preferably, this would measure the total number of dwellings in approved development applications.

As there are an increasing number of Councils introducing Affordable Rental Housing Schemes which are inconsistent with the Greater Sydney Commission's target of 5-10% of uplift in specified areas, where feasible.

Recommendation:

These metrics should be changed to:

- **Number of council with sufficient 'approved dwellings' to deliver housing targets**
- **Number of councils with schemes approved by the Greater Sydney Commission, that implement Affordable Rental Housing Targets.'**

2.7. SMALLER DWELLINGS MUST BE INCORPORATED INTO THE HOUSING MIX

The Draft Greater Sydney Region Plan States on page p59:

'Smaller dwellings are considered an acceptable approach to reducing housing costs

A smaller and smarter home initiative was announced in the NSW Government's housing affordability package *A Fair Go for First Home Buyers*

Commission research indicates that smaller homes of excellent design – including apartments, medium density dwellings and small land lots in the right locations – could create housing at around 20 per cent less than current market prices.

Innovative models for smaller homes are introducing elements such as shared facilities, including shared living spaces, to complement the smaller-dwelling design'.

The Urban Taskforce supports the NSW Government's understanding of smaller dwellings as a sensible and acceptable means of increasing the affordability of housing. However, to date we have not seen progress made towards developing government policy which permits and encourage smaller dwellings and lot sizes.

The Urban Taskforce and the property industry is keen to work with government in this regard and encourages the Greater Sydney Commission / NSW Government to progress work in this area, with involvement from the property industry.

Recommendation:

The Urban Taskforce urges the Greater Sydney Commission and the NSW Government to commence research and consultation with industry and stakeholders regarding smaller dwelling formats.

2.8. CUMULATIVE IMPACTS OF LEVIES MUST BE ACCOUNTED FOR

P29 of the Draft Greater Sydney Region Plan states that: *The Commission has identified the need for Government to prepare guidance to address the cumulative impacts of development contributions on development feasibility and delivery across Greater Sydney.*

Comment:

The Urban Taskforce strongly supports this initiative as there has been a rapid and alarming increase in property-development related costs from both state and local governments. These include:

- Removal of the cap on section 94 local infrastructure contributions
- Introduction of Special Infrastructure Contributions to additional areas
- Introduction of affordable housing levies
- Adoption of 'Value capture' policies by local councils
- Payments associated with Planning Agreements
- Infrastructure contributions associated with the provision of light rail (for example, Parramatta Light Rail)

We have expressed concerns that these new costs are introduced without considering the cumulative impacts of these costs upon development. The Urban Taskforce would be willing to assist government in development of guidance material around the cumulative impacts of development costs.

Recommendation:

- **The Draft Greater Sydney Region Plan include as a measurable 'Action' NSW Government will prepare guidance to address the cumulative impacts of development contributions on development feasibility and delivery across Greater Sydney, in consultation with stakeholders including the property industry. This guidance will be used to ensure that property developers are not unreasonably burdened by development levies.'**

2.9. COLLABORATION AREAS

P35 of the Draft Greater Sydney Region Plan states that *'Collaboration Areas are nominated areas where the Commission will facilitate the establishment of governance arrangements and support the coordination of activities across agencies and governments to deliver significant productivity, sustainability and livability outcomes.'* A range of Collaboration Areas are identified in the Draft Plans including strategically located precincts in Liverpool, Greater Penrith, Camperdown-Ultimo, Randwick, Rhodes East, Kogarah, Campbelltown-Macarthur, Australian Nuclear Science and Technology Organisation in Sutherland and Bankstown Airport / Milperra.

Comment:

The Urban Taskforce appreciates the need to identify collaboration areas to ensure coordinated land use and infrastructure planning and delivery.

The great risk with this approach is that the Greater Sydney Commission might now be picking 'winners and losers' when it comes to facilitating the growth of specific industries in particular locations across metropolitan Sydney. This may rob other industries of the change to grow or to form organically. Promotion of particular industries can lead to a lack of competition or protectionism.

We understand the NSW Government must make strategic choices about where to invest, be it in research, education, innovation, infrastructure or skills. The Collaboration Areas should support a wide range of land uses. The goals for these areas must be realistic – there is no point trying to replicate Silicon Valley, but there is value in supporting a range of industries with flexible land use zones and development controls. Good design, flexibility, innovation and a sensible and practical approach to land use planning and will ensure appropriate industries form organically and cluster develop over time.

Recommendation:

- **Collaboration Areas should incorporate flexible land use zoning and development controls to facilitate the organic growth and a range of industries.**

2.10. MIXED USE CENTRES MUST BE ENCOURAGED

The Draft Greater Sydney Region Plan and Draft District Plans identify a network of strategic centres which will become the focus for growth and development. However, no clear definition for 'strategic centre' or is provided in the draft plans.

Comment:

The Urban Taskforce is concerned that the Draft Plans seek to minimize or prohibit residential or mixed-use development in strategic centres. A clear definition specifying mixed use and residential development is permitted and encouraged in Strategic Centres is required.

The definition for 'Strategic Centre' provided in *A Plan for Growing Sydney* included a diversity of uses -

Strategic Centres - the largest centres in the Sydney Metropolitan Area, when developed. They contain mixed-use activity of an amount, density and diversity that is of metropolitan significance, including commercial (office, business and retail), civic and cultural uses, government services and higher density housing. They are typically on the passenger rail network or serviced by other high frequency public transport. Strategic Centres contain at least 10,000 jobs, with the potential to accommodate ongoing jobs growth over the long term. They are priority locations for employment and retail activity².

There is a clear and strong case for mixed use centres. Lucy Turnbull, Chief Commissioner of the Greater Sydney Commission has been quoted as saying 'Our ambition is for greater Sydney to be the kind of global city that is home to a mix and variety of places we want to live, work, study, play and visit – places that are close to those essentials like housing choices, smart jobs, great schools, healthcare, open spaces and facilities'³

In order to deliver on this vision for vibrant, mixed-use centres, which is supported by the Urban Taskforce, the Draft District Plans must encourage residential and mixed-use development in strategic and district centres, particularly in 'core' areas around transport nodes such as rail and metro stations. The Draft District Plans encourage the preservation of commercial and industrial land uses, and effectively prevent mixed use developments in key areas.

The benefits of mixed-use development are well known and supported by evidence and research. Urbanist Jane Jacobs strongly supported mixed uses and believed that sustainable urban development with a mix of land uses and increased densities in urban areas with a variety of users is the recipe for successful centres and districts⁴. In her book, *The Death and Life of American Cities*, Jacobs argued for a mixing of land uses. She stated the following:

The district, and indeed many of its internal parts as possible, must serve more than one primary function; preferably more than two. These must ensure the presence of people who

² *A Plan for Growing Sydney*, December 2014, NSW Government

³ Saulwick, J. (21 November 2016) [Job and housing targets boosted in Greater Sydney Commission District Plans](#), Sydney Morning Herald

⁴ Wooten, R. (27 May 2013), [Jane Jacob's ideas on viable cities are more relevant than ever](#), Michigan State University Extension

go outdoors on different schedules, and are in the place for different purposes, but who are able to use many facilities in common⁵

There are many benefits of mixed use centres. It is an excellent way to incorporate a mix of housing types on a small scale while enhancing the traditional character of the existing neighbourhood. Mixed use can be used to revitalise struggling neighbourhoods and spur economic development and activity. Additional benefits include:

- Guides residential development towards established infill areas, protecting outlying rural areas, environmentally sensitive resources and preventing urban sprawl;
- Enhances vitality of the neighbourhood
- Encourages economic investment
- Promotes a sense of community and a sense of place
- Reduces dependence upon cars, roadway congestion and air pollution through co-locating multiple destinations
- Promotes active centres, through pedestrian and bike travel,
- Promotes revitalisation
- Encourages high-quality, innovative urban design
- Preserves and enhances existing centres
- Promotes the development of a community through mixing retail, restaurant, offices civic uses and housing
- Provides housing opportunities
- Increases revenue streams for council
- Embodies 'Smart Growth'
- Promotes efficient use of land and infrastructure⁶.

Recommendation:

⁵ Jacobs, Jane (1961) *The Death and Life of Great American Cities*, Random House, New York

⁶ Metropolitan Area Planning Council, [What are the benefits of mixed use development?](#) 11 February 2010

- **The definition of 'Strategic Centre' provided in *A Plan for Growing Sydney* is included in the Draft Greater Sydney Region Plan and District Plan**
- **The Draft Plans are revised to ensure mixed use centres are planned for and encouraged**
- **Mixed use zones must be included in all strategic centres. A 'Commercial Core only' approach should not be adopted.**

2.11. CONVERSION OF INDUSTRIAL LAND TO MIXED USE OR RESIDENTIAL SHOULD BE PERMITTED WHERE APPROPRIATE

The 2014 Sydney Metropolitan Strategy, *A Plan for Growing Sydney*, adopted a pragmatic and practical approach to the conversion of industrial-zoned land to alternative land uses, which was supported by the property industry.

A Plan for Growing Sydney states:

Support key industrial precincts with appropriate planning controls:

The Industrial Lands Strategic Assessment Checklist will guide the assessment of proposed rezoning of industrial land. It poses questions about whether the site is near or within direct access to key economic infrastructure, how it contributes to a significant industry cluster, and how the proposed rezoning would impact on industrial land stocks and employment objectives in each sub region. The Checklist allows for evidence-based decisions and aims to prevent encroachment on important industrial sites.

The Government will undertake an analysis of Sydney's stock of industrial zoned land to identify key industrial precincts and use the findings to:

- *Determine where improved planning controls are required to better protect industrial land from conversion to other uses;*
- *Identify where improved and innovative planning controls will allow for the ongoing evolution of industrial activities to more intensive commercial activities;*
- *update the Industrial Lands Strategic Assessment Checklist and*
- *assess new proposals to convert existing industrial zoned land to other uses under the Industrial Lands Strategic Assessment Checklist.*

The Greater Sydney Commission has recommended that planning authorities should use the following approaches to manage industrial zoned land:

- **Eastern Harbour City:** Protect all industrial zoned land from conversion to residential development, including conversion to mixed-use zonings.
- **Central River City:** The Commission will undertake a review of all industrial land to confirm its protection or transition to higher order uses.
- **Western Parkland City:** Parts of this city are well established and need to be protected and managed in similar ways to the Eastern Harbour City (see above).

The development of under-utilised and redundant industrial and commercial land for residential and mixed-use purposes will revitalise and renew existing areas and provide badly-needed additional dwellings. The Urban Taskforce believes that 'protecting' industrial land from conversion is an inflexible approach and should be adjusted to take into account the specific circumstances of each site.

The Urban Taskforce understands the need to provide jobs and employment opportunities in strategic locations across Sydney. If a proponent could demonstrate that their proposed redevelopment of a site could result in the same amount of jobs or more (the 'no worse off' test), the rezoning proposal should proceed and be assessed on its merits.

The nature of employment and business is changing rapidly. Employment lands are already transitioning to industries which provide a higher 'employment dividend'. This is happening through shared work spaces, remote working, telecommuting and the transition away from manufacturing towards less space intensive industries such as knowledge and serviced based jobs.

Although it is important to evaluate and assess the importance of employment-generating land uses, it is crucial that housing supply is not hindered while this evaluation and assessment takes place.

Recommendation:

- **A flexible, site-by-site approach to the conversion of industrial land should be adopted, including a 'no worse off' test.**
- **The Greater Sydney Commission's proposed review of industrial land in the Central River City should not delay or prevent processing of rezoning applications within that area.**

2.12. NATIONAL AIRPORT SAFEGUARDING FRAMEWORK

P81 of the Draft Greater Sydney Region Plan outlines how Greater Sydney's trade gateways will be protected and managed in order to retain internationally competitive operations at key trade locations. We note that '*A statewide approach to implementation the National Airport Safeguarding Framework is being developed by the NSW Department of Planning and Environment*' as part of this process.

Comment:

The Urban Taskforce has frequently objected to the use of the National Airport Safeguarding Framework (the Framework) and supports the existing Australian Noise Exposure Forecast noise contouring system. This system has been in place for over 20 years and has successfully guided the management of aircraft noise and residential development around Sydney's busy Kingsford Smith Airport.

The NSW Government and the NSW Department of Planning and Environment has not formally endorsed nor accepted the Framework as an appropriate land use planning policy to safeguard NSW airports.

Recommendation:

- **We request the Commission remove reference to the National Airport Safeguarding Framework and endorse the existing Australian Noise Exposure Forecast noise contouring method as an appropriate mechanism to manage aircraft noise impacts upon development.**

2.13. URBAN DEVELOPMENT SHOULD BE PERMITTED IN METROPOLITAN RURAL AREAS WHERE APPROPRIATE

The Draft Greater Sydney Region Plan and Draft District Plans proposes to limit urban development to within the 'Urban Area' (except for certain investigation areas) (p139). Precautionary protection of the Metropolitan Rural Lands should not remove opportunities for efficient and economical use of the land. The draft District Plans propose the continuation of agricultural production in the Metropolitan Rural Area.

Mapping and understanding the range of values will provide the basis for the approach to strategic planning. The draft District Plans propose that this will take time and requires consultation due to the varying expectations of existing landowners and the public interest. Therefore, future planning proposals and new development of these lands are stalled through a precautionary approach unless the relevant planning authority has undertaken strategic planning in accordance with sustainability priorities established under the draft District Plans.

The Urban Taskforce acknowledges the need to protect viable agricultural land and strategically significant landscapes. However, there are some urban fringe areas which are predominantly used for large-lot residential purposes, with small pockets of low-impact agricultural uses that cannot deliver viable agricultural opportunities.

Significant factors reducing potential viability of agricultural activities within the rural fringe land include:

- High land values
- Fragmented ownership patterns
- Low classification of land and soil capability
- Recognized high start-up costs for establishing new agricultural pursuits, and
- Potential land use conflicts with existing rural residential development.

Where these factors are evident and preclude agricultural viability, the draft District Plans should not restrict the opportunity for rezoning to attain efficient and economical use of the land. The Urban Taskforce is concerned that the delay in identifying the values of these lands through local studies will further reduce the ability to provide housing capacity.

Recommendation:

- **The draft District Plans should be amended to include a provision to investigate appropriate opportunities for residential development within the Metropolitan Rural Area.**