

The NEW City of **CANTERBURY BANKSTOWN**



**Submission to the
Draft South District Plan
and the Draft Amendments
to the Metropolitan Plan
*‘A Plan for Growing
Sydney’***

Contents

Submission to the Draft South District Plan

Issue 1: The Draft South District Plan reads as a traditional land use planning strategy and does not address issues such as creating great places or place making initiatives.	4
Issue 2: Council does not support the proposed housing target for the City of Canterbury–Bankstown without upfront infrastructure support from the State Government.	5
Issue 3: Council does not support the downgrade of Bankstown and the Bankstown Airport / Milperra Specialised Centre in the centres hierarchy.	7
Issue 4: The Draft South District Plan does not identify infrastructure improvements to support population growth or the job / housing targets in the City of Canterbury–Bankstown.	8
Issue 5: The Draft South District Plan does not adequately address the need for major north–south transport improvements within the South District and to the West Central District.	10
Issue 6: The Draft South District Plan does not identify how the State Government will guide the planning for the Bankstown Airport / Milperra Specialised Centre.	11
Issue 7: Council does not support the Draft Medium Density Housing Code as a mechanism to increase housing capacity or accelerate the delivery of housing supply in the City of Canterbury–Bankstown.	12
Issue 8: The Draft South District Plan does not provide sufficient details on the delivery of the Affordable Housing Target.	14
Issue 9: The Draft South District Plan does not prioritise resilience.	16
Issue 10: The Draft South District Plan should support and expand projects which promote advanced energy and waste management.	17
Issue 11: Other Recommended Amendments to the Draft South District Plan.	18

**Submission to the Draft Amendments to the Metropolitan Plan
‘A Plan for Growing Sydney’**

Issue 1: Council does not support the downgrade of Bankstown and the Bankstown Airport / Milperra Specialised Centre in the centres hierarchy.	33
Issue 2: The Draft Amendments to the Metropolitan Plan ‘ <i>A Plan for Growing Sydney</i> ’ do not identify infrastructure improvements to support population growth or the job / housing targets in the City of Canterbury–Bankstown.	34
Issue 3: The Draft Amendments to the Metropolitan Plan ‘ <i>A Plan for Growing Sydney</i> ’ do not adequately address the need for major north–south transport improvements within the South District and to the West Central District.	36
Issue 4: The Draft Amendments to the Metropolitan Plan ‘ <i>A Plan for Growing Sydney</i> ’ do not identify how the State Government will guide the planning for the Bankstown Airport / Milperra Specialised Centre.	37
Issue 5: Council does not support the Draft Medium Density Housing Code as a mechanism to increase housing capacity or accelerate the delivery of housing supply in the City of Canterbury–Bankstown.	38
Issue 6: The Draft Amendments to the Metropolitan Plan ‘ <i>A Plan for Growing Sydney</i> ’ should incorporate the precautionary approach to the rezoning of employment and urban support lands.	40

Submission to the Draft South District Plan

A review identifies the following key issues that the Greater Sydney Commission should address prior to finalising the Draft South District Plan:

Issue 1: The Draft South District Plan reads as a traditional land use planning strategy and does not address issues such as creating great places or place making initiatives.

The Draft South District Plan reads as a traditional land use planning strategy with a significant number of actions stating that *‘relevant planning authorities should consider how these matters are to be demonstrated in any relevant planning proposal’*. It is unclear how the standard instrument local environmental plan or planning proposals will address issues such as creating great places (refer to page 99) or the funding and delivery of place making initiatives (refer to page 61). Other examples are:

- The Draft South District Plan proposes to improve liveability, which means putting people at the heart of planning for great places. It is not until you get to section 4.6 (page 99) that this is reinforced. Creating great places should be the vision of the Draft Plan (Chapter 2) and the actions should all aim to achieve great places.
- Reference is made to *‘planning mechanisms that would establish incentives’* to address issues such as the creation and resourcing of creative hubs and incubators (refer to page 106), new schools (refer to page 112) and urban agriculture and community roof gardens (refer to page 102). These actions rely on unrealistic expectations of the ability of planning mechanisms to deliver these outcomes.

The Draft South District Plan should be more than a traditional land use planning strategy and should provide equal direction to other state agencies.

Recommended Amendments to the Draft South District Plan:

- Review the vision and structure of the Draft South District Plan to be more than a traditional land use planning strategy.
- Move section 4.6 to Chapter 2 as creating great places should be the key vision of the Draft South District Plan. The actions of the Draft Plan should all aim to achieve great places.
- Broaden the range of mechanisms (such as infrastructure funding and delivery) to implement the priorities and actions.
- Ensure the Draft South District Plan provides equal direction to all state agencies.

Issue 2: Council does not support the proposed housing target for the City of Canterbury–Bankstown without upfront infrastructure support from the State Government.

Council's current planning framework, together with the Sydenham to Bankstown Urban Renewal Corridor Strategy, provides sufficient capacity to meet housing needs to 2036. Housing growth will be staged over 20 years to align with infrastructure provision and to address complex renewal issues affecting the city.

However, the Draft South District Plan (section 4.3.3) requires Council to deliver 13,250 new dwellings in the next 5 years (2016/17–2020/21). This equates to 2,650 new dwellings constructed per year (including this financial year).

This is the 4th highest housing target out of the 32 councils that make up the Greater Sydney Region.

Top 5 councils	Housing target to be delivered in the next 5 years	Source of growth
Parramatta	21,650	Central City CBD
Sydney	18,300	Eastern City CBD
Blacktown	13,950	North West Growth Centre
Canterbury–Bankstown	13,250	Not known
Camden	11,800	South West Growth Centre

It is unclear how the Greater Sydney Commission arrived at the housing target for Council. Without demonstrating the planning work required to arrive at the short term target, Council is concerned the housing target is unfeasible at best.

In addition, there are no details as to which state or local programs informed the housing target. For example:

- The Draft Sydenham to Bankstown Urban Renewal Corridor Strategy is to be re-exhibited. The dwelling capacity is currently under investigation and the Draft South District Plan should not rely on that capacity without the significant planning work required to resolve how that can be appropriately delivered.

The Sydney Metro infrastructure also remains uncertain as the Environmental Impact Statement is yet to be lodged.

- The Land and Housing Corporation, in consultation with Council and other state agencies, is working on a State Significant Precinct Study, which will decide the future directions for the Riverwood social housing estate. The dwelling capacity is currently under investigation.
- Council and the Department of Planning & Environment are reviewing the development framework for the Canterbury Road Corridor. The dwelling capacity is currently under investigation.

- There is no reference to Council's Local Area Plans.

The proposal to accelerate the delivery of an increased housing target over the next 5 years is therefore ambitious, and would require both significant upfront infrastructure support from the State Government and a review of the economic levers that influence both the housing market and land costs. This position is supported by the Draft South District Plan (section 4.4.6), which reads:

A major challenge in creating capacity for additional housing, particularly in land release and major urban renewal areas, is the coordination of infrastructure and land use planning so that infrastructure is delivered in the right place at the right time, in line with actual growth. This requires a detailed understanding of forecast growth and infrastructure investment programs across a range of providers and locations. A more targeted and coordinated approach to planning and delivering regional, district and local infrastructure would achieve this while also expediting investment and development, and potentially boosting the delivery of new housing.

It is noted that since Council prepared its local housing strategies (Bankstown in 2009 and Canterbury in 2013), there have been different housing targets announced at local and district levels, which have resulted in substantially increased targets. This lack of stability and certainty creates significant difficulties in planning for housing supply.

It is unclear as to whether the final version of the District Plan will include a 20 year housing target at a local council level. It will be difficult for councils to prepare local housing strategies without having a longer term target and to ensure collectively all councils will meet the District target.

Recommended Amendment to the Draft South District Plan:

- Review the housing target (and assumptions) in collaboration with Council.

Issue 3: Council does not support the downgrade of Bankstown and the Bankstown Airport / Milperra Specialised Centre in the centres hierarchy.

The Metropolitan Plan '*A Plan for Growing Sydney*' currently identifies Bankstown as a strategic centre and the Bankstown Airport / Milperra Specialised Centre as a strategic centre (transport gateway). This hierarchy informs the State Government's infrastructure priorities.

The Draft South District Plan (section 3.2.1) proposes to retain Kogarah as a strategic centre, and to downgrade Bankstown and the Bankstown Airport / Milperra Specialised Centre to district centres. The other district centres are Campsie, Hurstville, Miranda and Sutherland.

According to the Draft South District Plan, Kogarah is the only health and education super precinct to qualify as a strategic centre. As a result, Bankstown will not feature in an economic development strategy to be prepared for the Eastern City (comprising the North, Central and South Districts).

However, a comparison indicates the other districts contain more than one strategic centre to support economic growth:

District	Number of strategic centres	Strategic centres
Central	6	Sydney City, Sydney Airport, Green Square, Randwick, Port Botany, Rhodes
North	5	Macquarie Park, North Sydney, St Leonards, Chatswood, Northern Beaches Hospital
West Central	4	Parramatta, Sydney Olympic Park, Norwest, Blacktown
South West	2	Liverpool, Campbelltown
West	1	Penrith

It is considered the South District is capable of accommodating more than one strategic centre. The examples above indicate the role of strategic centres is not limited to health and education super precincts.

Recommended Amendments to the Draft South District Plan:

- Reinstate Bankstown as a strategic centre and the Bankstown Airport / Milperra Specialised Centre as a strategic centre (transport gateway). This is consistent with the findings of state and local strategic planning, and the economic role of Bankstown and Bankstown Airport in servicing south–west Sydney.
- Include Bankstown and the Bankstown Airport / Milperra Specialised Centre in the economic development strategy for the Eastern City, or insert an action to prepare an economic development strategy for Bankstown and the Bankstown Airport / Milperra Specialised Centre.

Issue 4: The Draft South District Plan does not identify infrastructure improvements to support population growth or the job / housing targets in the City of Canterbury–Bankstown.

The Draft South District Plan (sections 1.2.2–1.2.3) does not indicate a link between the job and housing targets with state infrastructure improvements. The biggest challenge is to fund the replacement of ageing state infrastructure to support growth. This includes having accessible stations, enhancing centres, supporting employment precincts, land acquisition, road network improvements, and regional stormwater drainage improvements.

This challenge also includes the replacement of ageing state infrastructure to support the Sydenham to Bankstown Urban Renewal Corridor Strategy. This includes the Campsie bypass, improved access over the railway line, land acquisition for new open space and mid-block connections, and the provision of mixed use development opportunities at the Bankstown railway station and surrounding surplus land.

At present, the State Government and Council rely mainly on development contributions to fund these works at a regional and local level. However, this process cannot keep pace with population growth. The financial impact is it will place pressure on Council and existing communities to find ways to fund or lobby the provision and maintenance of essential regional infrastructure and services.

The Draft South District Plan states *‘rezoning may be delayed until development is feasible, given the amount of supporting infrastructure required’* (page 19) however there is no clear action or reference to this fact in any other parts of the Draft Plan.

Whilst the Draft South District Plan raises the issue of value capture, this is subject to further work with no timetable for completion. It is important for the State Government to link the job and housing targets with state / regional infrastructure improvements prior to finalising the Draft South District Plan.

It is also critical that any value capture mechanism is developed and finalised before any planning proposals are prepared to prevent market uncertainty over future land uplifts.

Recommended Amendments to the Draft South District Plan:

- Identify the local and district infrastructure that is required to support employment lands, centres, urban renewal corridors and other growth areas in the City of Canterbury–Bankstown.
- Provide direction on the funding mechanisms for local and district infrastructure, including actions to:
 - Apply value capture as a funding mechanism prior to any upzonings associated with current urban renewal projects e.g. the Sydenham to Bankstown Urban Renewal Corridor Strategy.
 - Support Council's request to vary the levy rate for section 94 and 94A contributions in growth areas.
- Stage the delivery of the housing target to ensure it aligns with the delivery of upfront infrastructure support from the State Government.

Issue 5: The Draft South District Plan does not adequately address the need for major north–south transport improvements within the South District and to the West Central District.

The Draft South District Plan (section 3.8) appears to reinforce existing east–west transport connections to Sydney City such as the proposed Sydney Metro (Sydenham to Bankstown) and WestConnex. It does not adequately address the infrastructure gaps to support regional north–south transport connections within the South District and to Parramatta / West Central District. These include:

- The widening of Fairford Road / Stacey Street between the Hume Highway and M5 Motorway.
- The Hume Highway / Stacey Street grade separation.
- Investigation of a light rail connection to Parramatta.
- The inclusion of the Duck River Corridor as part of the green grid and open space network.
- The creation of the Campsie bypass.
- The widening of King Georges Road between Beverly Hills and South Hurstville.
- Improvements to Bexley Road between the M5 Motorway and Canterbury Road.
- Improvements to Henry Lawson Drive.

The South District sits in a unique position with proximity to all three ‘cities’ (Eastern, Central and Western) however these centres will only flourish if appropriate connections are made to all three. It is important for the State Government to commit to the delivery of major transport infrastructure upgrades prior to finalising the Draft South District Plan, particularly given the aim to provide accessible jobs and services within 30 minutes of homes.

Recommended Amendment to the Draft South District Plan:

- Insert an action to improve regional north–south transport connections within the South District and to the West Central District, and detail the funding and delivery of infrastructure to support these connections.

Issue 6: The Draft South District Plan does not identify how the State Government will guide the planning for the Bankstown Airport / Milperra Specialised Centre.

The Draft South District Plan (section 3.2.1) identifies the Bankstown Airport / Milperra Specialised Centre as providing capacity for up to 20,000 new jobs to 2036. However, there is no information to explain how this will be achieved given that the airport is on Commonwealth land and operates outside the state planning system.

In relation to building heights and airspace protection, the State Government should take a leading role to modernise the planning proposal / development application referral process to the Commonwealth Government.

Recommended Amendments to the Draft South District Plan:

- Insert an action to detail how the State Government and Commonwealth Government will coordinate the funding and delivery of infrastructure and public transport to support the Bankstown Airport / Milperra Specialised Centre. The action may read:

Coordinate planning and infrastructure delivery to grow the Bankstown Airport / Milperra Specialised Centre: We will work with a range of stakeholders when planning for the Bankstown Airport / Milperra Specialised Centre and supporting infrastructure. To do this, we have identified the centre as a Collaboration Area. We will work with the Commonwealth, state agencies, industry and the community to build on existing infrastructure and target growth in jobs and services.

- Insert an action to have the State Government take a leading role to modernise the planning proposal / development application referral process to the Commonwealth Government in relation to building heights and airspace protection.

Issue 7: Council does not support the Draft Medium Density Housing Code as a mechanism to increase housing capacity or accelerate the delivery of housing supply in the City of Canterbury–Bankstown.

The Draft South District Plan (section 4.3.4) requires Council to prepare a local housing strategy. The intended outcome of the strategy is to align housing capacity with infrastructure investment, and to consider medium density infill development as a housing choice. According to the Draft South District Plan:

Councils are in the best position to investigate opportunities for medium density in these areas, which we refer to as the 'missing middle'. Medium density housing is ideally located in transition areas between urban renewal precincts and existing suburbs, particularly around local centres and within the one to five kilometre catchment of regional transport where links for walking and cycling help promote a healthy lifestyle.

However at the same time, the Draft South District Plan advocates the Department of Planning & Environment's Draft Medium Density Housing Code (i.e. complying development) as a mechanism to increase housing capacity and to accelerate the delivery of housing supply.

Council does not support the Draft Medium Density Housing Code as:

- The proposed development controls will result in medium density housing that is incompatible with the prevailing low density character and amenity of the suburban neighbourhoods in the City of Canterbury–Bankstown.
- Complying development does not take into consideration the unique characteristics and issues within the various suburbs in the City of Canterbury–Bankstown, and is not designed to customise solutions to address potential impacts.
- Private certifiers are not qualified to assess the architectural merits of medium density housing to ensure it meets community expectations, particularly in the suburban neighbourhoods of the City of Canterbury–Bankstown.
- Complying development does not provide the community with the opportunity to comment on medium density housing proposals in the same way as development applications.
- The Draft Medium Density Housing Code does not recognise Council's demonstrated record that it can fast track the supply of medium density housing via the development assessment process.
- The Draft Medium Density Housing Code does not recognise current state and local strategic planning which already delivers medium density housing in the City of Canterbury–Bankstown. The Draft Code also pre-empts the Draft South District Plan, in particular the requirement for Council to prepare a local housing strategy to identify the best positions for medium density housing in the city.

Council's submission to the exhibition of the Draft Medium Density Housing Code discusses these key concerns in more detail.

If strategic planning is to occur in a coordinated and orderly manner, Council should first be given the opportunity to complete the local housing strategy. Once Council demonstrates that it can continue to efficiently deliver medium density housing in the city, it should be given the opportunity to be exempt from the Draft Medium Density Housing Code (similar to the exemption granted under the former State Environmental Planning Policy No. 53, which aimed to stimulate medium density housing in targeted areas).

Recommended Amendment to the Draft South District Plan:

- Insert an action to allow Council to prepare a local housing strategy that demonstrates it can continue to efficiently deliver medium density housing in the city.

Once Council demonstrates that it can continue to efficiently deliver medium density housing in the city, it should be given the opportunity to be exempt from the Draft Medium Density Housing Code (similar to the exemption granted under the former State Environmental Planning Policy No. 53, which aimed to stimulate medium density housing in targeted areas).

Issue 8: The Draft South District Plan does not provide sufficient details on the delivery of the Affordable Housing Target.

Fixing Sydney's housing problems is not simply a matter of increasing housing supply. This is clearly demonstrated by the statement '*dwelling approvals and completions are currently at their highest level in 16 years*' (page 79) yet we still have an affordability issue.

The supply of sufficient, well located affordable housing is crucial in supporting a sustainable, growing economy and a diverse, vibrant and inclusive Sydney. Like health, education, open space and community facilities, affordable housing is essential social infrastructure for a growing, thriving city. Affordable housing and housing diversity are a key part of Sydney's economic productivity and competitive advantage. However, the actions of the Draft South District Plan (section 4.4.4) do not go far enough to address this significant challenge.

The Draft South District Plan should refer to the recommendations made in the SSROC Affordable Housing Submission to the Greater Sydney Commission (dated 6 September 2016) and the SSROC Supplementary Affordable Housing Submission to the Greater Sydney Commission (dated 9 September 2016). According to the submissions:

- The Draft South District Plan should support at least 30% of all new housing created in priority urban renewal precincts, large redevelopment sites and government land to be affordable housing (in perpetuity). In other areas, the Draft Plan should support at least 15% of all new housing to be affordable housing (in perpetuity) for very low and low income households.
- The Draft South District Plan should support mandatory contribution rates of between 10% and 15% of saleable floor area within the Sydenham to Bankstown Urban Renewal Corridor.
- The Greater Sydney Commission should commit to a range of strategies and housing products to deliver the Affordable Housing Target including funded social housing, mandatory affordable housing levies, well-designed boarding houses, shared equity purchase arrangements, and opportunities for innovation by industry and the community housing sector. The Greater Sydney Commission should acknowledge that the market is unlikely to provide much of the required affordable housing in many areas without significant innovation.

The Draft South District Plan should also consider the mechanisms to deliver the Affordable Housing Target, namely:

- The legal mechanisms to mandate the target.
- Whether the target will replace the State Environmental Planning Policy (Affordable Rental Housing) 2009.
- Whether Council is the appropriate planning authority to secure and pass on the dwellings to registered community housing providers. This process is likely to involve the negotiation of voluntary planning agreements and it is not known whether this legal process will occur at the rezoning or development application stage, and whether developers can choose not to enter into planning agreements (given that it is voluntary).

- Whether the target will apply to current government–led urban renewal projects e.g. the Sydenham to Bankstown Urban Renewal Corridor Strategy.
- Whether the registered community housing providers will manage the dwellings in perpetuity rather than the current 10 year limit.

Recommended Amendments to the Draft South District Plan:

- Review the Affordable Housing Target and delivery mechanisms to align with the housing needs that are specific to the South District.
- Confirm whether the Affordable Housing Target will apply to current government–led urban renewal projects e.g. the Sydenham to Bankstown Urban Renewal Corridor Strategy.

Issue 9: The Draft South District Plan does not prioritise resilience.

Resilience is the overarching sustainability priority for the South District and Greater Sydney Region. The Draft South District Plan should elevate section 5.9 as a priority to reflect this. This priority should include the use of environmental targets or standards to guide the sustainability task, for example:

- A ‘green streets’ program would sit well under such a framework. Green streets are likely to become more important as extreme weather events (in particular heatwaves) increase in frequency and impact. The growth

centres are spaces where heat island effects are, and will continue to be, most felt due to the amount of hard surfaces. The Greater Sydney Commission can provide a coordinating role and assist in managing the competing interests of Council, Transport for NSW, Roads & Maritime Services and other stakeholders for this potential green space.

- The State Government could develop a methodology to measure or establish a carbon ‘budget’ or footprint for large scale developments and urban renewal projects (e.g. the Sydenham to Bankstown Urban Renewal Corridor Strategy), as well as various design options to reduce the carbon footprint. This would include design elements such as walkable distances to local shops, schools, public transport services, solar orientation and tree cover.
- The State Government could consult with Council to establish the maximum permissible carbon footprint for a large development. The private sector would then have guidance on where to focus their design efforts to fit within the carbon budget.
- An option to achieve energy savings at a precinct scale is for the State Government to consult with Council about the standards that should be mandated and legislated to achieve this. Standards should be consistent with other state and/or national energy efficiency goals.

Recommended Amendments to the Draft South District Plan:

- Elevate resilience as a priority.
- Review the targets, standards and programs in collaboration with Council to make the South District more resilient.

Issue 10: The Draft South District Plan should support and expand projects which promote advanced energy and waste management.

Council strongly supports the consideration of Energy-from-Waste as a particular category of renewable energy, since it would have the benefit of addressing the major future problem of Sydney’s increasing waste generation.

The Greater Sydney Commission should consider opportunities for a District wide waste management approach. The Draft South District Plan should therefore consider the following amendments to section 5.8.1:

1. Add the following dot points to Sustainability Priority 9:
 - Use appropriate land and land use zones to enable waste processing facilities including reuse, recycling and the conversion of waste to energy.
 - Allow for the provision of adequately management waste collection that will come from the growing number of medium and high rise residential buildings, complying development and social housing.
2. Amend the heading of Action S6 to read: Identify land ~~for~~ and facilitate projects that enable future waste processing, reuse and recycling.
3. Amend the last paragraph of Action S6 to read:

In accordance with Action 4.3.2 of *A Plan for Growing Sydney*, the Environment Protection Authority and the Department of Planning & Environment, in collaboration with councils, will identify additional land ~~for~~ and facilitate projects that enable future waste management processing, reuse and recycling and how and where precinct-based waste collection services could operate within Greater Sydney.

Recommended Amendment to the Draft South District Plan:

- Amend section 5.8.1 to identify land and facilitate projects that enable future waste processing, reuse and recycling.

Issue 11: Other Recommended Amendments to the Draft South District Plan.

11.0 Draft South District Plan–General

Issues	Recommended Amendments
The Draft Plan makes very little reference to the former City of Bankstown. It is noted that the former City of Bankstown moved from the	Update the Draft Plan (i.e. all chapters) to better reflect the infrastructure priorities of the City of Canterbury–Bankstown, particularly as

West Central District to the South District following an Order published in the Government Gazette of 11 November 2016.	it is the largest council in NSW with 350,000 residents.
The Draft Plan recommends planning proposals as the primary mechanism to implement the priorities. However, this approach will result in the Draft Plan being implemented on an ad-hoc basis.	Broaden the range of mechanisms (such as infrastructure funding and delivery) to implement the priorities.
<p>The Draft Plan misuses the term 'sustainability'.</p> <p>The Draft Plan is based around three central themes: Productive, Liveable and Sustainable. The use of the term 'sustainability' in the Draft Plan only refers to environmental issues, and is a misuse of the term 'sustainability'. Likewise the image on page 13 is misleading.</p> <p>Sustainability is not solely about environmental stewardship. The social and economic dimensions are equally important.</p>	Amend the Draft Plan to address all three elements of sustainability in its decision making practices.
The Draft Plan does not contain a chapter to deliver a Connected City.	Consolidate the Draft Plan and the NSW Long Term Transport Master Plan into a single document if the Greater Sydney Commission is to effectively align land use planning and infrastructure planning, and deliver a Connected City.

<p>Transport must be the fourth pillar of any metropolitan plan and district plans. Sydney should be productive, liveable, sustainable and <i>connected</i>.</p> <p>The Draft Plan's vision focuses on facilitating transport connections to strategic and district centres. Whilst this is supported, a key element of a centre's success lies in the quality of</p>	<p>The Greater Sydney Commission should commit to transport planning that is informed by a vision for more people-oriented streets. To achieve this, the priority to create great places should include:</p> <ul style="list-style-type: none"> • Transport action plans for growth centres.
---	---

<p>its streets and the ability to access and move around in a centre.</p> <p>Council's vision for the transport network within our growth centres is underpinned by an understanding that streets are also places. The activity and movement function of streets must be considered in the renewal of centres and the design of streets.</p> <p>This is reflected in Council's Local Area Plans which contain a key principle that our centres are places of connection where the movement of people is fundamental to the success of centres. The Local Area Plans set out the transport infrastructure required to assist in the movement of people, and is based on a movement / activity matrix.</p> <p>Whilst the Draft Plan seeks to create great places, the actions do not give due consideration to the benefits of great streets.</p>	<ul style="list-style-type: none"> Coordinated discussions with Transport for NSW and Roads & Maritime Services to achieve place making initiatives. The partnership of the Greater Sydney Commission with councils and Roads & Maritime Services to apply the movement / activity matrix. This will assist in the street design process.
---	---

11.1 Draft South District Plan–Chapter 1

Issues	Recommended Amendments
<p>Section 1.2.2–Planning for land use and infrastructure</p> <p>The Draft Plan does not state how the Annual Infrastructure Priority List will result in the timely delivery of</p>	<p>Ensure the Annual Infrastructure Priority List:</p> <ul style="list-style-type: none"> Identifies the local and district infrastructure that is required to support employment lands,

<p>infrastructure to support land use changes and development in centres and other growth areas.</p> <p>At present, the State Government and Council rely mainly on development contributions to fund these works at a regional and local level. However, this process cannot keep pace with population growth. The financial impact is it will place pressure on Council and existing communities to find ways to fund or lobby the provision and maintenance of essential regional infrastructure and services.</p>	<p>centres, urban renewal corridors and other growth areas in the City of Canterbury–Bankstown.</p> <ul style="list-style-type: none"> Provides direction on the funding mechanisms for local and district infrastructure, including actions to: <ul style="list-style-type: none"> Apply value capture as a funding mechanism prior to any upzonings associated with current urban renewal projects e.g. the Sydenham to Bankstown Urban Renewal Corridor Strategy. Support Council's request to vary the levy rate for section 94 and 94A contributions in growth areas. Stages the delivery of the housing target to ensure it aligns with the delivery of upfront infrastructure support from the State Government.
<p>Section 1.2.2–Planning for land use and infrastructure</p> <p>The Draft Plan must set out how the policy streams – productive, liveable, and sustainable – will be integrated to achieve great centres as this is where the significant change will occur.</p> <p>Council has developed an integrated planning approach through our Local Area Plans. These plans are more than housing strategies. The Local Area Plans ensure that adequate land, infrastructure, facilities and open space are available and appropriately located to sustainably accommodate future housing and employment needs.</p>	<p>Amend Action IM1 to make explicit the role of the Greater Sydney Commission in facilitating integrated planning for centres.</p> <p>Further, Council has identified a detailed list of infrastructure requirements to support growth in centres in the City of Canterbury–Bankstown. Council expects the Annual Infrastructure Priority List to incorporate this detailed list of infrastructure.</p>

11.2 Draft South District Plan–Chapter 2

Issues	Recommended Amendments
<p>The Draft Plan focuses on a 3 Cities concept without recognising the important role of those areas to the north and south of Sydney.</p>	<p>Amend the Draft Plan to incorporate the concept that Sydney is a complete and complex network of centres that all must work together.</p>

Historically the Greater Sydney Region has focused on one City, the City of Sydney. Eventually it was recognised that Sydney could no longer follow this model and it was decided that we were now 2 cities with Parramatta being the second CBD.

It appears the Greater Sydney Commission is adding a third city rather than considering Sydney as a complete and complex network of centres that all must work together. This concept is reinforced by the statement on page 44, which reads *‘the growth, innovation and evolution of strategic centres will underpin the success of Greater Sydney’*.

11.3 Draft South District Plan–Chapter 3

Issues	Recommended Amendments
Section 3.1–The South District’s economy	Amend the Draft Plan:

<p>This section highlights a jobs gap between the existing / proposed population for the South District and the existing / proposed jobs growth, highlighting a shortage of jobs in the knowledge and professional services sector. However, the Draft Plan does not identify any strategies to improve the current situation.</p> <p>There appears to be an expectation that residents of the South District will need to commute to the adjoining districts to access jobs, especially high paid, highly skilled jobs. The downgrading of Bankstown and the Bankstown Airport / Milperra Specialised Centre as strategic centres need to be reconsidered in this context, as well as the provision of increased opportunities for knowledge based jobs in the other centres in the City of Canterbury–Bankstown.</p>	<ul style="list-style-type: none"> • To reinstate Bankstown as a strategic centre and the Bankstown Airport / Milperra Specialised Centre as a strategic centre (transport gateway). • To include Bankstown and the Bankstown Airport / Milperra Specialised Centre in the economic development strategy for the Eastern City, or insert an action to prepare an economic development strategy for Bankstown and the Bankstown Airport / Milperra Specialised Centre. • To provide increased opportunities for knowledge based jobs in other centres in the City of Canterbury–Bankstown.
<p>Section 3.2.1–Plan for the growth of centres</p> <p>The Draft Plan does not clearly define the hierarchy of centres.</p>	<p>The Draft Plan should retain the walking catchment radius for each centre type as per previous Metropolitan Plans. This helps to determine the study area boundary for the centres, particularly when calculating the existing and proposed number of dwellings within the walking catchment.</p> <p>The Draft Plan should also retain the definition of neighbourhood centres to separate the ‘few shops on a corner’ from the larger local centres.</p>

<p>Section 3.4.4–Planning priorities for strategic, district and local centres</p>	<p>Amend the proposed priorities for Bankstown to include:</p> <ul style="list-style-type: none"> • Underground the railway station, create an ‘at-grade’ connection between The Appian Way and
---	---

<p>It is unclear how the Greater Sydney Commission arrived at the proposed priorities for Bankstown.</p>	<p>Restwell Street, and improve the bus interchange.</p> <ul style="list-style-type: none"> • Widen Fairford Road / Stacey Street (between the M5 Motorway and the Hume Highway), and provide grade separation at the intersection of Stacey Street and the Hume Highway. • Enhance the quality of Paul Keating Park. • Implement public domain improvement works. • Construct a new community facility in Griffiths Park. • Enhance the quality and connections to Ruse Park, and convert it into a regionally significant parkland. • Implement the regional stormwater drainage improvements.
<p>Section 3.4.4–Planning priorities for strategic, district and local centres</p> <p>It is unclear how the Greater Sydney Commission arrived at the proposed priorities for Campsie.</p> <p>Campsie has been promoted in the hierarchy of centres from the previous Draft Subregional Strategy. However, Campsie lacks the infrastructure to support this new role, and this has not been sufficiently addressed in the Draft Plan.</p>	<p>Amend the proposed priorities for Campsie to include:</p> <ul style="list-style-type: none"> • Provide a formalised interchange between rail and bus. • Improve the amenity and appearance of the existing rail (freight) corridor, and apply noise and vibration mitigation measures to new development. • Provide a new West Campsie Road bypass to connect Bexley Road and Coronation Parade, and divert regional traffic movements from the centre and congested local roads. • Provide a new railway line road crossing to the east of Beamish Street to relieve congestion on Beamish Street and improve circulation. • Enhance bus priority on Beamish Street. • Implement public domain improvement works. • Provide a new district community facility. • Improvements to Canterbury Road.
<p>Section 3.4.4–Planning priorities for strategic, district and local centres</p>	<p>Insert an action to prioritise the delivery of accessible stations in growth areas, and ensure these</p>

<p>According to the Draft Plan, a principle that underpins many of the priorities is to increase housing choice around all centres through urban renewal in established areas.</p> <p>Whilst Council has delivered significant improvements to land around public transport hubs, additional planning and financial support is required from the State Government. In particular, the need to upgrade access to key railway stations. The non-alignment of Transport for NSW's planning process with the state / Council's planning process has hindered a coordinated planning approach for centres and has led to lost opportunities for more integrated urban renewal.</p> <p>For example, Council prepared Local Area Plans to increase housing choice around local centres with railway stations. Council sought commitments from Transport for NSW and Sydney Trains to provide Chester Hill, Yagoona, Birrong, Panania and Punchbowl with accessible stations, given the expected population increase in these centres. The state agencies did not engage with Council's strategic planning process as these centres are not flagged as priorities under their programs.</p>	<p>stations integrate with the public domain and urban renewal opportunities.</p>
<p>Section 3.5–Managing employment and urban services land across the District</p> <p>The Draft Plan introduces a precautionary approach to the rezoning of employment and urban support lands.</p> <p>Council supports this precautionary approach.</p>	<p>Amend Action 1.9.2 of the Metropolitan Plan 'A Plan for Growing Sydney' by incorporating the precautionary approach to the rezoning of employment and urban support lands.</p>

<p>3.8–Accessing a greater number of jobs and services within 30 minutes</p> <p>In relation to public transport, the public transport connections from the City of Canterbury–Bankstown to the proposed Kogarah strategic centre require upgrading, particularly direct bus services from Campsie and Bankstown.</p> <p>The Draft Plan also identifies increasing the capacity on the Bankstown and Illawarra Lines. This should be extended to the Airport East Hills Line and Chester Hill, where some stations have low service frequencies.</p>	<p>Amend the Draft Plan to improve bus connections between strategic and district centres.</p> <p>Amend the Draft Plan to identify an appropriate level of service to maximise public transport usage on the railway system, during both peak and off peak periods. It is recommended that all stations should have a service at least every 10 minutes during peak periods, and at least every 15 minutes in off peak periods.</p>
<p>3.8–Accessing a greater number of jobs and services within 30 minutes</p> <p>The proposed amendments to the Environmental Planning & Assessment Act 1979 refer to a new SEPP that will designate future infrastructure corridors. A strategic plan must identify the corridor and it must be zoned appropriately in an environmental planning instrument.</p> <p>The Draft Plan should identify the future infrastructure corridors to inform the new SEPP and planning proposals.</p>	<p>Amend the Draft Plan by identifying future infrastructure corridors to inform the new SEPP and planning proposals.</p>

3.9–Managing freight activities across the District

The Draft Plan proposes to improve freight operations across the district.

However, the Draft Plan does not resolve the incompatibility between the need to protect freight corridors (road / rail) by restricting adjacent incompatible land uses (such as residential development) and this Draft Plan, which promotes residential development along freight corridors.

The Environmental Protection Authority recommends that relevant planning authorities anticipate, avoid or manage potential noise impacts as early as possible in the planning process (*NSW Industrial Noise Policy*). Resolving noise problems after they occur may not always be possible and is often difficult and costly. The preferred option is to avoid the location of sensitive land uses next to noisy activities. This would help to avoid exposing future residents to excessive noise.

Given the above, the Draft Plan should apply a precautionary approach to avoid the intrusion of incompatible land uses. The Draft Plan should also apply noise and vibration mitigation measures to new development in the vicinity of freight corridors, given the growth anticipated near the freight corridors.

Council is also concerned about the off-site impacts of the operation of intermodal terminals adjacent to residential areas. The use of local roads to access the terminal, and truck parking around the terminal have significant impacts on the amenity of residential areas. The Draft Plan should consider approaches to mitigate these impacts.

Insert an action to resolve the incompatibility between the need to protect freight corridors, and the push to promote residential development along freight corridors.

Insert an action to apply noise and vibration mitigation measures to new development in the vicinity of freight corridors.

3.9–Managing freight activities across the District

The most significant transport infrastructure cost to Council is the maintenance of road infrastructure. Council is the custodian of a high value yet vulnerable portfolio of road infrastructure worth more than \$1billion. Council must manage this responsibility in a sustainable manner.

Any decision which accelerates the degradation of road assets will have significant financial implications for Council. Such decisions include any increase in heavy vehicles on local roads. These implications must be balanced against the net benefit for the community and finding assistance for asset management. Council considers it imperative that funding for road infrastructure aligns with the road hierarchy and the scope of the economic benefits of the corridor.

Road freight corridors serve the national interest and as such should be predominantly funded by the Commonwealth and State Governments. There is no justifiable reason for the City of Canterbury–Bankstown’s community to directly bear the costs to upgrade and upkeep these corridors.

Insert an action to apply mechanisms that appropriately allocate funding based on an agreed road hierarchy.

11.4 Draft South District Plan–Chapter 4

Issues	Recommended Amendments
<p>Section 4.3.5–Create housing capacity in the South District</p> <p>The Draft Plan does not make reference to Council's Local Area Plans, which seek to create housing capacity in the former City of Bankstown to 2031 (consistent with the Metropolitan Plan).</p>	<p>Insert references to Council's Local Area Plans.</p>
<p>Section 4.6.2–Plan for safe and healthy places</p> <p>The Draft Plan suggests relevant planning authorities should consider the inclusion of planning mechanisms such as floor space bonuses to incentivise the provision of walkable neighbourhoods with good walking and cycling connections. However, the Department of Planning & Environment did not support Council's request to introduce such a mechanism in a recent planning proposal.</p>	<p>Confirm whether the Department of Planning & Environment will support this mechanism prior to inserting this suggestion in the Draft Plan.</p>
<p>Section 4.7.1–Conserve and enhance environmental heritage</p> <p>With the growth levels envisaged in the Draft Plan, there will be conflict in conserving heritage properties / streetscapes and accommodating new growth. It would be appropriate for the Greater Sydney Commission to take the lead in this respect and prepare a District Heritage Plan to ensure conservation of heritage assets of district significance.</p> <p>It is also difficult to see under current planning legislation how Council can require the adaptive reuse of heritage listed buildings. The provisions enabling adaptive reuse are in the standard instrument local environmental plan, but are not</p>	<p>Insert an action for the Greater Sydney Commission to prepare a District Heritage Plan in respect of conserving heritage and unique local characteristics.</p>

obligatory on an owner unless the item is state listed.

Section 4.7.2–Support the creative arts and culture

The Draft Plan makes no reference to the Bankstown Arts Centre, one of the most significant facilities in the South District.

Include a description of the role of the Bankstown Arts Centre.

11.5 Draft South District Plan–Chapter 5

Issues	Recommended Amendments
Section 5.3–Protecting the District’s waterways Council is proud of its track record in developing sound environmental monitoring and reporting. For example, Council completed a review of 12 years of water quality data collected by the former Bankstown City Council, and reviewed by Dr Ian Wright of the Western Sydney University and the GRCCC (Georges River Combined Councils Committee) River Health Program.	Amend the Draft Plan to build on good practice by Council in environmental monitoring and reporting. The Greater Sydney Commission and the Office of Environment & Health should be working with proactive councils and committees to develop standard criteria and approaches for monitoring across the South District.
Section 5.5–Protecting and enhancing biodiversity The Draft Plan states ‘ <i>the objectives of strategic conservation planning for the South District are to:</i> - <i>Reduce the cost and timeframes for development approvals, including approvals for infrastructure</i> ’. It is unclear what this means and how this is an objective of ‘strategic conservation planning’.	Amend the Draft Plan to explain what this statement means and how this is an objective of ‘strategic conservation planning’.

<p>Section 5.5–Protecting and enhancing biodiversity</p> <p>Without strong leadership from the Greater Sydney Commission, trees and biodiversity habitat will continue to be lost without consideration of the cumulative impacts of development.</p>	<p>The Greater Sydney Commission should review state policies that affect bushland and biodiversity habitat, with a view to strengthening environmental conditions and agreements to retain trees and biodiversity habitat.</p> <p>Increased enforcement for the retention of trees and vegetation of significant environmental value is fundamental to achieving sustainability outcomes. There is the potential to strengthen the requirement for development to prove that impacts cannot be avoided or minimised. A higher level of justification and documentation is needed before offsetting is considered.</p>
<p>Section 5.5–Protecting and enhancing biodiversity</p> <p>This section describes areas of native vegetation as areas that are close to existing national parks.</p>	<p>Broaden the areas of native vegetation to be covered by section 5.5.</p> <p>For the South District, conservation planning should focus on opportunities to protect and enhance areas of valuable native vegetation close to existing national parks, bushland areas, open space and biodiversity corridors.</p>
<p>Section 5.6–Delivering Sydney’s green grid</p> <p>The Draft Plan does not make reference to the Duck River Open Space Corridor as a priority green grid project.</p>	<p>Include the Duck River Open Space Corridor as a priority green grid project. The corridor functions as a major north–south connection between the South District and the West Central District.</p>
<p>Section 5.6–Delivering Sydney’s green grid</p> <p>The Draft Plan does not contain adequate funding mechanisms for the purposes of land acquisition. This is needed to deliver the State Government’s green grid priorities.</p>	<p>Insert an action to provide state funding support for the purposes of land acquisition, where it is required to address gaps in the regional open space network that forms part of the green grid.</p>

<p>Section 5.6–Delivering Sydney’s green grid</p> <p>The Draft Plan proposes to protect, enhance and extend the urban canopy.</p> <p>However, there are no supporting policy statements. Housing lots are becoming smaller and public street verges are becoming narrower. Development is retaining or planting fewer trees.</p> <p>State agencies (such as Transport for NSW, Roads & Maritime Services and electricity providers) also discourage street trees in the footway if it is perceived to conflict with infrastructure projects or transport routes.</p>	<p>Insert an action to explain how the Draft Plan will resolve these issues to deliver the green grid.</p> <p>For the green grid to be effective, the focus should not only be on the major green corridors but the network of smaller connections that link the major corridors. In particular, the importance of greening streets to encourage people to access the major corridors.</p> <p>Action S4 is vague and more specific direction is required on what is meant by ‘toolkits and consistent methodology to help plan for active recreation and open space’.</p>
<p>Section 5.6–Delivering Sydney’s green grid</p> <p>National Parks and district bushland areas, open space and biodiversity corridors have recreation outcomes but are also an environmental asset for the Greater Sydney Region.</p> <p>Any funding is welcome, however a more streamlined funding process should be developed to reduce the time required to obtain such funds and to align this process with any priorities identified by Council in its forward planning.</p>	<p>Amend the Draft Plan to properly resource and prioritise the management of national parks, bushland areas, open space and biodiversity corridors.</p> <p>Prioritise the Sydenham to Bankstown Open Space Corridor as the first priority of the Green Grid Program. The forecast dwelling growth in this part of the corridor is in the order of 30,000 dwellings. This would yield a population of around 90,000 new residents. The corridor affects 8 centres within the City of Canterbury–Bankstown and includes approximately 11km of ‘Greenway’, and 17 new or improved open spaces.</p>

<p>Section 5.8.2–Energy and water</p> <p>The Draft Plan should support existing novel solutions in order to provide certainty to initiatives such as <i>Our Solar Future</i> (joint SSROC / Council initiative for community participation in renewable energy).</p> <p>Council supports the action to build the capacity of local communities to deliver and own renewable energy.</p>	<p>Amend the Draft Plan to support and expand projects which promote advanced energy.</p> <p>Further opportunities for advanced energy for which planning support is needed include:</p> <ul style="list-style-type: none">• A detailed review and upgrade of the BASIX requirements and implementation. Council recommends new requirements for BASIX to include solar for multi-residential properties.• Support of community ownership of solar panels, solar for medium sized industry through PPAs or low interest loans and similar mechanisms for expanding renewable energy use in Southern Sydney.• Developing a rating that measures the resilience of a building or facility to climate change.
--	--

Submission to the Draft Amendments to the Metropolitan Plan 'A Plan for Growing Sydney'

A review identifies the following key issues that the Greater Sydney Commission should address prior to finalising the Draft Amendments to the Metropolitan Plan 'A Plan for Growing Sydney':

Issue 1: Council does not support the downgrade of Bankstown and the Bankstown Airport / Milperra Specialised Centre in the centres hierarchy.

The Metropolitan Plan 'A Plan for Growing Sydney' currently identifies Bankstown as a strategic centre and the Bankstown Airport / Milperra Specialised Centre as a strategic centre (transport gateway). This hierarchy informs the State Government's infrastructure priorities.

The Draft South District Plan (section 3.2.1) proposes to retain Kogarah as a strategic centre, and to downgrade Bankstown and the Bankstown Airport / Milperra Specialised Centre to district centres. The other district centres are Campsie, Hurstville, Miranda and Sutherland.

According to the Draft South District Plan, Kogarah is the only health and education super precinct to qualify as a strategic centre. As a result, Bankstown will not feature in an economic development strategy to be prepared for the Eastern City (comprising the North, Central and South Districts). However, a comparison indicates the other districts contain more than one strategic centre to support economic growth:

District	Number of strategic centres	Strategic centres
Central	6	Sydney City, Sydney Airport, Green Square, Randwick, Port Botany, Rhodes
North	5	Macquarie Park, North Sydney, St Leonards, Chatswood, Northern Beaches Hospital
West Central	4	Parramatta, Sydney Olympic Park, Norwest, Blacktown
South West	2	Liverpool, Campbelltown
West	1	Penrith

It is considered the South District is capable of accommodating more than one strategic centre. The examples above indicate the role of strategic centres is not limited to health and education super precincts.

Recommended Amendments to the Metropolitan Plan ‘A Plan for Growing Sydney’:

- Reinstates Bankstown as a strategic centre and the Bankstown Airport / Milperra Specialised Centre as a strategic centre (transport gateway). This is consistent with the findings of state and local strategic planning, and the economic role of Bankstown and Bankstown Airport in servicing south–west Sydney.
- Include Bankstown and the Bankstown Airport / Milperra Specialised Centre in the economic development strategy for the Eastern City, or insert an action to prepare an economic development strategy for Bankstown and the Bankstown Airport / Milperra Specialised Centre.

Issue 2: The Draft Amendments to the Metropolitan Plan ‘A Plan for Growing Sydney’ do not identify infrastructure improvements to support population growth or the job / housing targets in the City of Canterbury–Bankstown.

The Draft Amendments to the Metropolitan Plan do not indicate a link between the job and housing targets with state infrastructure improvements. The biggest challenge is to fund the replacement of ageing state infrastructure to support growth. This includes having accessible stations, enhancing centres, supporting employment precincts, land acquisition, road network improvements, and regional stormwater drainage improvements.

This challenge also includes the replacement of ageing state infrastructure to support the Sydenham to Bankstown Urban Renewal Corridor Strategy. This includes the Campsie bypass, improved access over the railway line, land acquisition for new open space and mid–block connections, and the provision of mixed use development opportunities at the Bankstown railway station and surrounding surplus land.

At present, the State Government and Council rely mainly on development contributions to fund these works at a regional and local level. However, this process cannot keep pace with population growth. The financial impact is it will place pressure on Council and existing communities to find ways to fund or lobby the provision and maintenance of essential regional infrastructure and services.

The Draft South District Plan states *‘rezoning may be delayed until development is feasible, given the amount of supporting infrastructure required’* (page 19) however there is no clear action or reference to this fact in the Metropolitan Plan or the Draft South District Plan.

Whilst the Draft South District Plan raises the issue of value capture, this is subject to further work with no timetable for completion. It is important for the State Government to link the job and housing targets with state / regional infrastructure improvements prior to finalising the Draft Amendments to the Metropolitan Plan and the Draft South District Plan.

It is also critical that any value capture mechanism is developed and finalised before any planning proposals are prepared to prevent market uncertainty over future land uplifts.

Recommended Amendments to the Metropolitan Plan ‘A Plan for Growing Sydney’:

- Identify the local and district infrastructure that is required to support employment lands, centres, urban renewal corridors and other growth areas in the City of Canterbury–Bankstown.
- Provide direction on the funding mechanisms for local and district infrastructure, including actions to:
 - Apply value capture as a funding mechanism prior to any upzonings associated with current urban renewal projects e.g. the Sydenham to Bankstown Urban Renewal Corridor Strategy.
 - Support Council's request to vary the levy rate for section 94 and 94A contributions in growth areas.
- Stage the delivery of the housing target to ensure it aligns with the delivery of upfront infrastructure support from the State Government.

Issue 3: The Draft Amendments to the Metropolitan Plan ‘A Plan for Growing Sydney’ do not adequately address the need for major north–south transport improvements within the South District and to the West Central District.

The Draft Amendments to the Metropolitan Plan appear to reinforce existing east–west transport connections to Sydney City such as the proposed Sydney Metro (Sydenham to Bankstown) and WestConnex. The Draft Amendments do not adequately address the infrastructure gaps to support regional north–south transport connections within the South District and to Parramatta / West Central District. These include:

- The widening of Fairford Road / Stacey Street between the Hume Highway and M5 Motorway.
- The Hume Highway / Stacey Street grade separation.
- Investigation of a light rail connection to Parramatta.
- The inclusion of the Duck River Corridor as part of the green grid and open space network.
- The creation of the Campsie bypass.
- The widening of King Georges Road between Beverly Hills and South Hurstville.
- Improvements to Bexley Road between the M5 Motorway and Canterbury Road.
- Improvements to Henry Lawson Drive.

The South District sits in a unique position with proximity to all three ‘cities’ (Eastern, Central and Western) however these centres will only flourish if appropriate connections are made to all three. It is important for the State Government to commit to the delivery of major transport infrastructure upgrades prior to finalising the Draft Amendments to the Metropolitan Plan and the Draft South District Plan, particularly given the aim to provide accessible jobs and services within 30 minutes of homes.



Recommended Amendment to the Metropolitan Plan ‘A Plan for Growing Sydney’:

- Insert an action to improve regional north–south transport connections within the South District and to the West Central District, and detail the funding and delivery of infrastructure to support these connections.

Issue 4: The Draft Amendments to the Metropolitan Plan ‘A Plan for Growing Sydney’ do not identify how the State Government will guide the planning for the Bankstown Airport / Milperra Specialised Centre.

The Metropolitan Plan ‘A Plan for Growing Sydney’ currently identifies the Bankstown Airport / Milperra Specialised Centre as a strategic centre (transport gateway). This hierarchy informs the State Government’s infrastructure priorities. However, there is no information to explain how this will be achieved given that the airport is on Commonwealth land and operates outside the state planning system.

In relation to building heights and airspace protection, the State Government should take a leading role to modernise the planning proposal / development application referral process to the Commonwealth Government.

Recommended Amendments to the Metropolitan Plan ‘A Plan for Growing Sydney’:

- Insert an action to detail how the State Government and Commonwealth Government will coordinate the funding and delivery of infrastructure and public transport to support the Bankstown Airport / Milperra Specialised Centre. The action may read:

Coordinate planning and infrastructure delivery to grow the Bankstown Airport / Milperra Specialised Centre: We will work with a range of stakeholders when planning for the Bankstown Airport / Milperra Specialised Centre and supporting infrastructure. To do this, we have identified the centre as a Collaboration Area. We will work with the Commonwealth, state agencies, industry and the community to build on existing infrastructure and target growth in jobs and services.

- Insert an action to have the State Government take a leading role to modernise the planning proposal / development application referral process to the Commonwealth Government in relation to building heights and airspace protection.

Issue 5: Council does not support the Draft Medium Density Housing Code as a mechanism to increase housing capacity or accelerate the delivery of housing supply in the City of Canterbury–Bankstown.

The Draft South District Plan (section 4.3.4) requires Council to prepare a local housing strategy. The intended outcome of the strategy is to align housing capacity with infrastructure investment, and to consider medium density infill development as a housing choice. According to the Draft South District Plan:

Councils are in the best position to investigate opportunities for medium density in these areas, which we refer to as the 'missing middle'. Medium density housing is ideally located in transition areas between urban renewal precincts and existing suburbs, particularly around local centres and within the one to five kilometre catchment of regional transport where links for walking and cycling help promote a healthy lifestyle.

However at the same time, the Draft Amendments to the Metropolitan Plan advocate the Department of Planning & Environment's Draft Medium Density Housing Code (i.e. complying development) as a mechanism to increase housing capacity and to accelerate the delivery of housing supply.

Council does not support the Draft Medium Density Housing Code as:

- The proposed development controls will result in medium density housing that is incompatible with the prevailing low density character and amenity of the suburban neighbourhoods in the City of Canterbury–Bankstown.
- Complying development does not take into consideration the unique characteristics and issues within the various suburbs in the City of Canterbury–Bankstown, and is not designed to customise solutions to address potential impacts.
- Private certifiers are not qualified to assess the architectural merits of medium density housing to ensure it meets community expectations, particularly in the suburban neighbourhoods of the City of Canterbury–Bankstown.
- Complying development does not provide the community with the opportunity to comment on medium density housing proposals in the same way as development applications.

- The Draft Medium Density Housing Code does not recognise Council's demonstrated record that it can fast track the supply of medium density housing via the development assessment process.
- The Draft Medium Density Housing Code does not recognise current state and local strategic planning which already delivers medium density housing in the City of Canterbury–Bankstown. The Draft Code also pre-empted the Draft South District Plan, in particular the requirement for Council to prepare a local housing strategy to identify the best positions for medium density housing in the city.

Council's submission to the exhibition of the Draft Medium Density Housing Code discusses these key concerns in more detail.

If strategic planning is to occur in a coordinated and orderly manner, Council should first be given the opportunity to complete the local housing strategy. Once Council demonstrates that it can continue to efficiently deliver medium density housing in the city, it should be given the opportunity to be exempt from the Draft Medium Density Housing Code (similar to the exemption granted under the former State Environmental Planning Policy No. 53, which aimed to stimulate medium density housing in targeted areas).

Recommended Amendment to the Metropolitan Plan 'A Plan for Growing Sydney':

- Insert an action to allow Council to prepare a local housing strategy that demonstrates it can continue to efficiently deliver medium density housing in the city.

Once Council demonstrates that it can continue to efficiently deliver medium density housing in the city, it should be given the opportunity to be exempt from the Draft Medium Density Housing Code (similar to the exemption granted under the former State Environmental Planning Policy No. 53, which aimed to stimulate medium density housing in targeted areas).

Issue 6: The Draft Amendments to the Metropolitan Plan ‘A Plan for Growing Sydney’ should incorporate the precautionary approach to the rezoning of employment and urban support lands.

The Draft South District Plan introduces a precautionary approach to the rezoning of employment and urban support lands.

Council supports the precautionary approach and considers that Action 1.9.2 of the Metropolitan Plan should be amended accordingly.

Recommended Amendment to the Metropolitan Plan ‘A Plan for Growing Sydney’:

- Amend the Metropolitan Plan (Action 1.9.2) by incorporating the precautionary approach to the rezoning of employment and urban support lands.