



## Summary of Save Greater Sydney Coalition submission

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## Key Asks State Level

### 1 Develop accurate data on Sydney's real density levels

1. Develop an accurate assessment of Greater Sydney's true density picture; one that doesn't discount the reality that Sydney is already home to many high-density areas. The former Greater Cities Commission, for example, calculated that the dwelling mix for the Eastern Harbour City in 2021 was 43% apartments, 21% semi-detached and medium density dwellings and 36% single dwelling houses. These statistics include a huge swathe of local council areas, a number of which are located well beyond the inner-city area: eg Bayside, Burwood, Canada Bay, Hornsby, Hunters Hill, Inner West, Ku-ring-gai, Lane Cove, Mosman, North Sydney, Northern Beaches, Randwick, Ryde, Strathfield, Sutherland Shire, Sydney, Waverley, Willoughby and Woollahra.
2. Recognise that many of Sydney's most densely populated areas are dominated by Heritage Conservation Areas (HCAs), e.g. Elizabeth Bay, Chippendale, Rushcutters Bay, Ultimo, Potts Point, Haymarket, Pyrmont, Darlinghurst, Woollahra, Forest Lodge and Newtown.
3. Acknowledge that Greater Sydney is a biodiversity hotspot surrounded by national parks and an exceptional coastline that are host to an array of threatened native fauna and flora that rely on biodiversity corridors in the metropolitan areas to survive and thrive.

### 2 Develop/release modelling on the projected population increases in areas impacted by the TODs

1. Develop/release modelling on projected increases to population for areas impacted by the TOD Program to ensure that all the necessary enabling infrastructure is either already provided or is able to be effectively accommodated.

### 3 Identify and acknowledge significant capacity constraints on road networks and public transport

1. Acknowledge the 2019 Infrastructure Australia report on significant traffic congestion problems across Sydney. It also said that density increases in Sydney are putting too much pressure on Sydney's public transport networks despite recent investments to improve capacity.



## 5 Strengthen planning controls to protect amenity, heritage, local character & the environment

1. Remove the application of so-called non-refusal standards, especially with respect to minimum lot sizes, setbacks and other controls that undermine amenity including privacy, solar access, streetscape, local character and open space.
2. Recognise and support the strong public interest in protecting built and natural heritage, and prevent the undermining of hard-fought laws and controls designed to ensure the compatibility of new development in historic and environmentally sensitive areas.
3. Reinstate the 2018 Department of Planning initiative *Stepping up planning and designing for better places: respecting and enhancing local character*. It recommended incorporating local character considerations into strategic planning for new precincts. The DPE 16 January 2018 Circular, for example, stated the following:
  - o *NSW is rapidly growing and, respecting and enhancing local character are important considerations in planning for the growth of our cities, towns and regions... Local character should be considered at every stage of the planning and development process in NSW.*

Specific initiatives included:

- a) developing a local character statement, in consultation with the local community, at the commencement of all planned precinct initiatives;
  - b) amending the Standard Instrument LEP to establish overlays for additional consideration of local character in areas of significance;
  - c) and allowing councils to identify areas of exceptional local character in local housing strategies and exempt local character areas from the application of code complying development.
5. Strengthen versus weaken the Apartment Design Guide.
  6. *Limit the overriding of local council planning powers with respect to unsolicited planning proposals*. Developers should not be able to request reviews, for example, of planning proposal decisions in cases where they have not been recommended for approval by a council's local planning panel and subsequently refused by the local council.
  7. Exempt TOD areas and their surrounding suburbs from the application of the proposed changes to low and mid-rise housing in order to ensure that these areas are not subjected to the impacts of additional unplanned density.
  8. *Limit the application of code complying development to exclude medium density housing including dual occupancy attached developments*. Typically, the codes are not in line with stricter council controls, leading to poorly designed housing with limited to no room for private space and tree canopy.



9. Strengthen versus weaken protection for HCAs. Many areas in Sydney should be listed on the UNESCO World Heritage website. This is used widely overseas, and has proved a big huge draw card for tourism.

## 6 Design measures to curtail land banking

1. Implement rules to stop land-banking and the languishing of development approvals. Emeritus Professor Peter Phibbs University of Western Sydney, Chair of Urban and Regional Planning and Policy at the University of Sydney, on 17<sup>th</sup> November 2023 stated

*"Our six largest publicly listed private housing developers in Australia have got 11 years of housing supply in their land banks, 11 years, right?"*

*And when you go read their annual reports, what they tell their shareholders, their plan is to drip that stuff out into the market to maintain price pressure to generate profits for their shareholders."*

## 7 Integrate good urban design into mental health & climate change policies

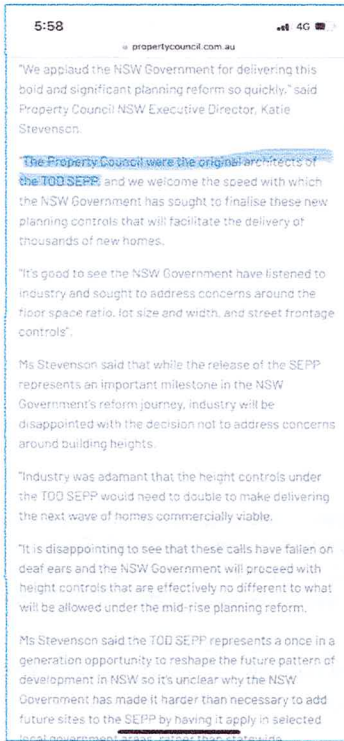
1. Acknowledge and respect that character, non-uniformity, historical continuity, and parks and trees improve a community's sense of well-being and mitigate the impacts of climate change.
2. Develop a mandatory suite of policies to build cooler cities and suburbs. According to UNSW Professor Mattheos Santamouris, without action to help residents adapt to hotter summers, "many places" in Western Sydney will be abandoned over the next 20 to 30 years. Campbelltown, for example, recorded 22 days above 40C in the summer of 2018-19.
3. *Acknowledge that increasing density in the inner city will not take the pressure off urban sprawl and its consequent impact on native fauna and flora*. The recently approved Cumberland Plain Conservation Plan for the Greater Macarthur Growth Region will facilitate the building of around 73,000 new homes by releasing approximately 11,000 hectares of rural land for urban redevelopment over the next 25 years. This is the area that is home to the last surviving koala population in Sydney, the critically endangered Cumberland Plain Woodland and numerous other threatened species.

## 8 Limit the pernicious and outsized influence of the property industry on housing policy

1. According to Prof Randolph of UNSW's City Futures, the main reason why successive state governments have failed to prioritise sustainability and liveability is because the property industry has influenced the state government to fixate on growth at all costs: *"The prime criteria for both is the development numbers. It's not sustainability or liveability."*



- The Property Council of Australia has taken credit for being the original architects of the TOD SEPP – See screen capture below.



## 9 Introduce meaningful affordable & social housing mandates

- Require developers to deliver a meaningful level of affordable housing onsite in new developments that are delivered under the TOD Program. The current proposal to require a 2% mandatory contribution for affordable housing around the stations identified in the TOD SEPP is far from world's best practice. The London Plan, for example, has a 50% affordable housing target. <https://www.building.co.uk/focus/gove-and-khans-row-over-londons-housing-delivery-numbers-explained/5127599.article>
- Remove bonus incentives for the provision of affordable housing in areas that will be given an uplift in density and FSR as a result of the application of the TOD Program.
- Set a target that at least 10% of all housing stock is to be delivered as social housing. The dramatic decline in federal and state government's delivery of social and affordable housing over the last 50 years has forced low income earners to increasingly rely on the private sector for their housing needs. In the mid-1980s, for example, roughly one in four renters



were housed in social housing, effectively removing most low-income renters from the private rental market. Their share has now declined to less than one in 10, according to research conducted by the independent public policy think tank Per Capita.

- Place stronger restrictions on short-term rentals to free up longer term rentals. Dr Crommelin, senior lecturer in City Planning at UNSW, notes that housing was already unaffordable before short-term letting platforms like Airbnb came along, and their popularity is "another factor [contributing to the tight rental market] because they have increased the scale of short-term letting, placing further strain on the existing housing supply."

## 10 Mandatory dwelling caps to ensure that infrastructure keeps pace with density growth

- Cap the number of dwellings in green field housing estates and other areas, and stop dwelling caps from being overridden by state SEPPs. Councils typically enter in VPAs with major developers for the funding and delivery of essential infrastructure based on the number of projected dwellings. In many cases, these caps have been overridden by State SEPPs, with councils not legally allowed to enforce them, thus leading to situations where infrastructure can't keep up with demand and the edge effects of higher density place too much pressure on native wildlife habitat and increase the heat island effect.



## 11 Establish a truly independent statutory planning authority to coordinate growth

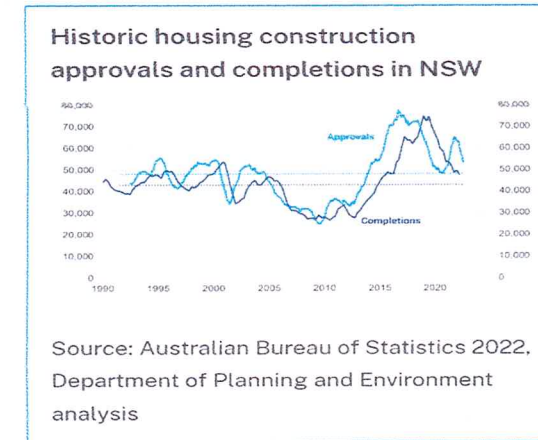
1. Establish a truly independent planning body that spans departments to deliver on the promise of more housing or more transport or hospitals or more parks.
2. Ensure the delivery of important but subsequently abandoned DPE initiatives like the Design and Place SEPP.
3. Properly consider environmental and natural hazard risks, including the impact of increasing population density in areas that are subject to localised flooding, bushfire and rising sea levels or home to threatened species and ecological communities.
4. Design transport planning so that it responds comprehensively to the needs of the community, eg includes benchmarks for comfort and convenience as well as enroute travel time targets.

## 12 Reform development contributions to ensure infrastructure is delivered promptly & equitably

1. Ensure that revenue generated by the new Housing Productivity Contribution (HPC) tax will be directed to fund infrastructure in areas where it's needed most.
2. Propose lifting the rate of 7.11 & 7.12 local development contributions and redesigning how they are calculated and applied. These contribution schemes are used by councils to fund essential local community facilities, stormwater drainage, local open space and local roads.
3. Assist councils with the funding of essential community infrastructure to allow for its more timely delivery upfront. Both the HPC and local infrastructure contributions are dependent on the rate of building starts, a funding system that has contributed to a lag in the construction of new infrastructure necessary to support growth in new housing across Greater Sydney.

## 13 Dispel myth more supply = lower housing prices

1. Leading academics and have referred to the “more supply leads to more affordable homes” approach as a “myth”. Craig Knowles, former Planning Minister in the Carr government, says that the constant default of successive governments to the decade's long affordability crisis in Sydney housing has been to try to churn out more supply. And according to Professor Larry Murphy of the University of Auckland, the subtext of arguments about increasing housing supply always boils down to developers arguing for the need to remove constraints, taxes and levies in the planning system. It is worth noting again that prior to the pandemic, DA approvals in NSW were at record highs.



## Key Asks Federal Level

### 14 Promote tax reform to disincentivise housing as a financial investment

1. Reduce federal government subsidies for private investment in housing, eg negative gearing and capital gains. Everybody's Homes "Written Off" argues that investor tax breaks have outstripped spending on social housing by at least five times. About \$164 per person was spent on public and community housing in 1982 vs \$61 in 2022.
2. Restrict foreign buyer access to new homes for investment purposes. A recent Sydney Telegraph article pointed to the sizeable volume of investor interest in Sydney property from overseas buyers. According to Ray White's chief economist Nerida Conisbee, developers often rely on pre-sales to foreign investors to bankroll new projects.