# INQUIRY INTO SYDENHAM-BANKSTOWN LINE CONVERSION

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# Inquiry by NSW Legislative Council Portfolio Committee No. 6 (Transport and Customer Service) into the conversion of the Sydenham-Bankstown Line

# Submission by Sophie Cotsis MP State Member for Canterbury

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## **Summary**

As the State Member of Parliament for Canterbury, I have significant concerns about the conversion of the rail line between Sydenham and Bankstown from a heavy rail service to a Metro service.

This project will affect thousands of people in my electorate. In particular, this project will affect residents in my electorate who use train stations at:

- Hurlstone Park;
- Canterbury;
- Campsie; and
- Belmore.

The Government has promised that the Sydenham-Bankstown Line Conversion (SBLC) will deliver two main benefits:

- 1. By removing the "T3 Bankstown Line" from the City Circle line, the SBLC will clear a bottleneck in the existing rail network, improve reliability and create room for 100,000 extra passengers across the network.
- 2. The project promises to provide more frequent services for passengers who use stations between Sydenham and Bankstown, with services to run every four minutes during peak periods.<sup>1</sup>

Many of my constituents have expressed concerns to me regarding the SBLC. The essence of these concerns can be distilled as three questions:

- Could the NSW Government have achieved similar public transport benefits through alternative projects?
- 2. Could the expenditure involved in the SBLC project have been better used to improve other services, such as local schools and hospitals?
- 3. Why has the Metro project been tied to plans for significant population growth and residential apartment developments in our community?

<sup>&</sup>lt;sup>1</sup> Sydney Metro: https://www.sydneymetro.info/citysouthwest/sydenham-bankstown

I am concerned the SBLC is being used as a "Trojan Horse" for the Government's true agenda of foisting inappropriate levels of residential development in communities along the rail corridor.

I am concerned that, even if the SBLC delivers the benefits the Government has promised, the overall quality of life for local residents will suffer.

Local services in the electorate of Canterbury are already under pressure from recent population increases and overdevelopment. While the SBLC is being used to justify future developments, no funding has been allocated to address the pressures already faced by Canterbury Hospital, local schools, or other services.

I believe this Inquiry should:

- Examine the justifications used by the NSW Government for the SBLC; and
- Examine whether sufficient consideration was given to alternative projects.

#### About this submission

This submission is made in my capacity as a Member of Parliament. It is not made on behalf of the NSW Labor Party.

This submission should not be considered an exhaustive description of my concerns regarding this project, or a summary of all the concerns residents have expressed to me. Rather, I have attempted to set-out some of the most significant issues which I believe are relevant to the Inquiry's terms of reference.

## **Background**

The electorate of Canterbury has four train stations:

- Hurlstone Park;
- Canterbury;
- Campsie; and
- Belmore.

All four train stations are on the "T3" line which operates between the Sydney CBD and either Liverpool or Lidcombe via Bankstown. All four stations are directly affected by the proposal to convert the portion of the T3 line between Sydenham and Bankstown from a heavy rail service to a new driverless Metro.

The table below shows the main methods people in the electorate of Canterbury travel to work according to the 2016 Census.<sup>2</sup>

Method of travel	Number of people	Percentage
Car (as driver)	20,234	51.5%
Train	6,829	17.4%
Car (as passenger)	1,728	4.4%
Bus	1,259	3.2%
Combination of train and bus	1,247	3.2%

The data in the above table shows train services are the most common method of public transport which people in Canterbury use to get to work.

The table below shows the average number of people who entered train stations in the electorate of Canterbury during a 24 hour period over each of the last three years.<sup>3</sup>

Station	Station Entries over 24 hours			
Station	2016	2017	2018	
Belmore Station	2,820	3,090	3,040	
Campsie Station	7,790	8,540	9,170	
Canterbury Station	2,290	2,880	3,220	
Hurlstone Park Station	1,450	1,520	1,640	
TOTAL	14,350	16,030	17,070	

<sup>&</sup>lt;sup>2</sup> 2016 Census Community Profile: Canterbury State Electoral Division, published by the Australian Bureau of Statistics on 23 October 2017

<sup>&</sup>lt;sup>3</sup> Train Station Entries and Exits Dataset published by Transport for NSW in December 2018

The data in the above table indicates that around 2,700 additional people have started using train services in the electorate of Canterbury over the last three years. This is an increase of 19 percent.

The increase in passenger numbers reflects population growth which has occurred in the electorate of Canterbury over recent years. Census data shows the population of the electorate of Canterbury grew by 8.4 percent between 2011 and 2016.<sup>4</sup>

The growth in passenger numbers and population shows additional investment in public transport services for the Canterbury electorate is justified. The population growth Canterbury has experienced also shows that additional investment is justified for <u>all</u> types of public services in the electorate of Canterbury, including Canterbury Hospital, local schools and other services.

<sup>&</sup>lt;sup>4</sup> NSW Electorate Profiles: 2016 Census, published by the NSW Parliamentary Research Service in May 2018, p. 46-47

# Context for the project

Prior to the 2019 State Election, NSW Labor requested the Parliamentary Budget Office (PBO) estimate the savings which could be realised if the NSW Government did not proceed with the SBLC project. The PBO estimated the conversion of the rail line between Sydenham and Bankstown will cost \$1.6 billion.<sup>5</sup>

Given the NSW Government is prepared to spend \$1.6 billion converting an existing rail line to a Metro service, I believe there are two questions this Inquiry must answer:

- 1. Could the NSW Government have achieved equivalent or greater improvements to public transport by spending \$1.6 billion another way?
- 2. Could the NSW Government have delivered greater benefits for residents in south-western Sydney by investing \$1.6 billion to improve a mix of services including public transport, hospitals and schools?

#### History of the project

In June 2012, the NSW Government released *Sydney's Rail Future: Modernising Sydney's Trains*. In her message for this document, then Transport Minister Gladys Berejiklian MP stated:

We will introduce single deck, rapid transit trains on the North West Rail Link. Sydney will also have a second crossing under the Harbour linking to a new CBD line and new stations, which will use rapid transit services that will also eventually operate on the Bankstown line and to Hurstville on the Illawarra line.

Figure 5 on page 11 of *Sydney's Rail Future* contains a map of the proposed new Rapid Transit Network. This map is reproduced below.

<sup>&</sup>lt;sup>5</sup> Election Costing A013: 'Do not proceed with the Sydenham to Bankstown line conversion', NSW Parliamentary Budget Office, 18 March 2019

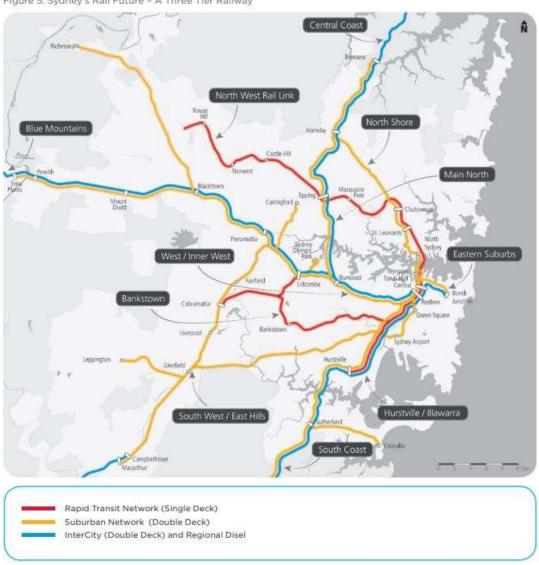


Figure 5: Sydney's Rail Future - A Three Tier Railway

Sydney's Rail Future states the NSW Government considered 'up to 15 different options for the future of Sydney's rail system'.6 Figure 8 on page 23 of Sydney's Rail Future contains 'decision tree' diagram, which is reproduced below.

<sup>&</sup>lt;sup>6</sup> Sydney's Rail Future, NSW Government, June 2012, p. 21

Sydney's Rail Future Master Planning Decision Tree **Key Decision 1 Key Decision 2** The Suburban Option Suburban Service The Rebuild Option Existing Harbou Crossing Suburban Double Deci or Differentiated Single and Double Deck Existing Sydney's Rail Future build new Harbour Crossing **Preferred Option** New capacity and new Harbour Crossing Harbour Crossing Differentiated Service The Independent **Transit System Option** Independent Network new Harbour Crossing

Figure 8: Decision tree

Sydney's Pail Future Master Planning Decision Tre

While *Sydney's Rail Future* provides a justification for the Government's preferred option, it does not provide any detail regarding the 14 alternative projects which were apparently considered. *Sydney's Rail Future* also does not explain why the Government believed the rail lines to Hurstville and Bankstown – and not others – should be converted to a Metro service.

#### The Waterloo Metro station

There are reasons to be sceptical of the Government's decision-making processes regarding the Metro. While it is not in my electorate, I believe the decision-making process regarding the Waterloo Metro station is illustrative of the Government's true priorities.

In 2015, the NSW Government was considering whether a new Metro station should be built at Sydney University or Waterloo.<sup>7</sup> The decision was characterised as a contest between the University of Sydney and UrbanGrowth, the NSW Government's property development agency. Sydney University promised that, if it was chosen, it would build a new \$1.5 billion "knowledge hub".<sup>8</sup> Additionally, it was reported a station

<sup>&</sup>lt;sup>7</sup> Battle of Waterloo v University of Sydney for the next Sydney Metro train station, The Sunday Telegraph, 30 August 2015

<sup>8</sup> Plans for \$1.5b 'knowledge hub' above proposed train station at Sydney University, Sydney Morning Herald, 5 November 2015

at Sydney University would have higher passenger numbers than Waterloo.<sup>9</sup> However, the NSW Government decided to place the new station at Waterloo.

On 16 December 2015, the *Sydney Morning Herald* reported:

#### Waterloo chosen over Sydney University as site for new metro train station

Public housing towers in Waterloo will be bulldozed as part of a major urban renewal project over the next 20 years to accommodate 30,000 extra residents in 10,000 new dwellings around a railway station.

. . .

The entire development will eventually cover about 40 hectares. Private landowners within an 800-metre radius of the proposed new Waterloo station, which will form part of the Sydney metro line, are likely to see their land rezoned for high and medium density.

. . .

The selection of Waterloo dashes the ambitions of Sydney University for a new station to be built on its campus.

While Sydney University had considerably more commuters, [then Premier] Baird said the government had favoured Waterloo because a new station offered a chance to revitalise the suburb.

On 17 December 2015, the Australian Financial Review reported:

#### **Developers to win from Sydney Metro stop in Waterloo**

In a decision with significant development implications, the Baird government has opted to put a key inner city station on the new Sydney Metro line at Waterloo, and not at Sydney University.

The decision will benefit a number of developers in the area and those keen to work in the future on the redevelopment of one of Sydney's largest social housing estates.

. . .

In the near term, it is the developers with projects around the housing estate that will benefit.

They include the listed heavyweight Mirvac, which has a project on Lachlan Street, the local private developer Deicorp, which has a project in Bourke Street, and two China-based developers, JQZ, which has a project in Bourke Street, and Dahua, which owns the former Water Board site on the corner of Bourke and Lachlan streets.

<sup>&</sup>lt;sup>9</sup> Mike Baird the deciding vote as cabinet chooses housing over university, Sydney Morning Herald, 29 January 2016

On 31 May 2018, the Sydney Morning Herald reported:

#### Three 20-plus storey towers to sit around new Waterloo metro station

Seven hundred apartments will be built on a large block around a new rail station in inner-Sydney Waterloo, government documents show.

The Waterloo "Metro Quarter" proposal by the government's UrbanGrowth Development Corporation and Sydney Metro, made available on Wednesday, includes four residential towers of 29, 25, 23 and 14 storeys.

Much of the development would occur at the same time as construction of the train station, which will form part of a new metro line connecting a new route under the central business district with the existing Bankstown Line.

There are several concerning aspects of the Waterloo station decision which are relevant to the SBLC project:

- First, it is concerning that even when presented with an alternative option with equal or greater benefits for the public – the NSW Government chose the option which would deliver the greatest benefits for property developers.
- Second, it is clear the NSW Government views the Metro as a means to justify 'unlocking' areas for property development, rather than a service which would improve transport for existing residents.
- Third, the scale of development proposed for Waterloo appears to be equivalent
  to the scale of development envisaged for stations along the rail corridor
  between Sydenham and Bankstown. This is a concern for my electorate given
  the significant developments and population growth we have already seen.

#### **Transfer Duty and Asset Sales**

While it is not strictly within the terms of reference for this Committee, I believe it is important to understand the role residential housing development increasingly plays in relation to the NSW Government's finances.

Since coming to office in 2011, the NSW Liberals have sold more than \$55 billion worth of public assets. <sup>10</sup> Many of these assets had generated recurrent income for the NSW Government. While the sale of these assets provided one-off revenue 'sugar-hits', the long-term effect has been that the NSW Government's finances are increasingly reliant on transfer duties from real estate transactions.

<sup>&</sup>lt;sup>10</sup> Privatisation in NSW: a timeline and key sources, NSW Parliamentary Research Service, June 2017, p. 8-9

The NSW Government acknowledged this in the 2019-20 Budget:

New South Wales has become more reliant on transfer duties in recent years, which rose from \$3.8 billion in 2011-12 to \$9.7 billion at its peak in 2016-17. Since the 2017-18 Budget a softening of the housing market has resulted in a write down of more than \$10 billion in forecast transfer duty.<sup>11</sup>

I believe the Committee should examine the link between the Metro, residential property development, and the NSW Government's financial position. I believe the Committee should consider whether the NSW Government's increasing reliance on transfer duty has created an inappropriate incentive for the Government to push developments in order to generate revenue which has been lost due to privatisations.

<sup>&</sup>lt;sup>11</sup> NSW Budget 2019-20, Budget Paper No. 1, A1 - 11

# The planning and approval process

#### The 'Critical State Significant Infrastructure' designation

The conversion of the rail line between Sydenham and Bankstown is part of the larger 'Sydney Metro City & Southwest' project.

On 10 December 2015, then Minister for Planning Rob Stokes MP made the *Environmental Planning and Assessment Amendment (Sydney Metro City and Southwest Project) Order 2015*. The effect of this Order was to add the Sydney Metro City & Southwest project to the list of 'critical state significant infrastructure' found at Schedule 5 of *State Environmental Planning Policy (State and Regional Development) 2011*. Division 5.2 of the *Environmental Planning and Assessment Act 1979* specifies requirements for the assessment and approval of critical state significant infrastructure.

The current provisions regarding critical state significant infrastructure were introduced by the NSW Liberal Government through the *Environmental Planning and Assessment Amendment (Part 3A Repeal) Bill 2011*.<sup>12</sup> In his second reading speech for that Bill, then Minister for Planning and Infrastructure Brad Hazzard MP said:

The concept of critical infrastructure was first introduced in 2005 to ensure that there was a straightforward and quicker way to assess and approve infrastructure projects of high importance to delivering government infrastructure priorities to the public. Today there is still a need to have in place a way to speed up the assessment and determination of high-priority public infrastructure proposals.

. . .

The main distinction between State significant infrastructure and critical infrastructure is that for State significant infrastructure an assessment is undertaken to determine whether the development should proceed. However, for critical infrastructure the proposal will generally already be recognised as a priority to proceed, and the assessment process assists in determining the details of how it will proceed.<sup>13</sup>

<sup>&</sup>lt;sup>12</sup> On 1 March 2018 the *Environmental Planning and Assessment Amendment Act 2017* commenced. An effect of this Act was to renumber the provisions of the *Environmental Planning and Assessment Act 1979* using a decimal system.

<sup>&</sup>lt;sup>13</sup> NSW Legislative Assembly Hansard, 16 June 2011

There are three key ways that critical state significant infrastructure is treated differently from other types of proposals under the NSW planning system:

- The decision to approve critical state significant infrastructure lies only with the Minister for Planning. This power cannot be delegated, although the Minister is to consider on a report by the Planning Secretary before deciding whether to approve a project.<sup>14</sup>
- 2. Special provisions restrict the ability to seek judicial review or challenge the validity of decisions in Court.<sup>15</sup>
- 3. There is no ability to have any decision reviewed on its merits. 16

In relation to these matters, then Minister for Planning and Infrastructure Brad Hazzard MP said during his second reading speech for the *Environmental Planning* and Assessment Amendment (Part 3A Repeal) Bill 2011:

As currently applies under part 3A, it will not be possible for any person, interest group, or other entity, including local councils or other government agencies, to commence legal proceedings under the *Environmental Planning and Assessment Act 1979*, or any other environmental legislation in this State, or to issue stop work orders to prevent the government agency, or public private partnership, or private infrastructure provider, from carrying out the project.

The critical infrastructure provisions in this bill will not prevent interest groups and communities going to court to seek judicial review about whether a proposal has been assessed and determined in accordance with the law, in line with the principles recognised last year by the High Court in the case of *Kirk v WorkCover*. However, the bill ensures that there are no additional rights to seek judicial review of a decision on critical infrastructure, statutory or otherwise, beyond those recognised in *Kirk*.

The provisions for critical infrastructure strike the appropriate balance between the rule of law and the role of the courts in reviewing the decisions of public officials, the need for certainty for investors, and the imperative that these projects be delivered speedily and without interference for the benefit of all the people of New South Wales.<sup>17</sup>

<sup>&</sup>lt;sup>14</sup> Environmental Planning and Assessment Act 1979 s 5.14 (formerly s 115W), s 5.19 (formerly s 115ZB) and s 2.4(3)(b) (formerly s 23(8)(a2))

 $<sup>^{15}</sup>$  Environmental Planning and Assessment Act 1979 s 5.26 (formerly s 115ZJ) and s 5.27 (formerly s 115ZK)

<sup>&</sup>lt;sup>16</sup> In contrast, development applications made under Part 4 of *Environmental Planning and Assessment Act 1979* can be reviewed pursuant to Division 8.2 of the *Environmental Planning and Assessment Act 1979* 

<sup>&</sup>lt;sup>17</sup> NSW Legislative Assembly Hansard, 16 June 2011

The Government are likely to make submissions that this project was subject to a rigorous assessment process which involved a detailed Environmental Impact Statement (EIS) and extensive community consultation. I believe that any submission to that effect should be rejected.

While an EIS was prepared and a community consultation process took place, this occurred after the Government had decided to proceed with the project.

In order to be designated as critical state significant infrastructure, the Minister for Planning must decide a project is 'essential for the State for economic, environmental or social reasons'. This means the Minister had determined that the project should proceed <u>before</u> he received the report from the Planning Secretary on the outcomes of the EIS and community consultation process.

The fact that the Minister for Planning prejudges that critical state significant infrastructure projects should be approved is not a loophole – it is exactly how the legislation is intended to work.

As then Minister for Planning and Infrastructure Brad Hazzard MP observed when he introduced the current provisions:

...for critical infrastructure the proposal will generally already be recognised as a priority to proceed, and the assessment process assists in determining the details of how it will proceed.<sup>19</sup>

The distinction between 'whether a project should proceed' and 'the details of how it will proceed' is problematic. In order to assess whether potential negative impacts associated with a project are justified, it is necessary to have regard to the overall benefits the project promises. For example, in relation to the SBLC project, the disruption for existing train passengers during the construction phase would only be justified if it is outweighed by long-term benefits once the project is complete. However, because the Minister for Planning had already declared the project to be 'essential for the State', the benefits of the project have never been properly analysed. Moreover, by deciding that a project is 'essential for the State', it appears any disruption could conceivably be justified to ensure the project is completed.

I believe the Committee should consider whether the Minister for Planning was an appropriate person to determine whether this project should have proceeded. The Minister lacks independence. As a Member of the Government, the Minister is effectively both one of the proponents of the project and the person responsible for deciding if it should proceed. This situation is compounded by provisions of the

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<sup>&</sup>lt;sup>18</sup> Environmental Planning and Assessment Act 1979 s 5.13 (formerly s 115V)

<sup>&</sup>lt;sup>19</sup> NSW Legislative Assembly Hansard, 16 June 2011

Environmental Planning and Assessment Act 1979 which limit or exclude merit-based review and judicial review for critical state significant infrastructure projects.

#### The Environmental Impact Statement and Community Consultation

Before the Minister for Planning can formally approve critical state significant infrastructure, an EIS must be prepared and placed on public exhibition.<sup>20</sup> The minimum period which an EIS must be exhibited for critical state significant infrastructure is 28 days.<sup>21</sup>

The EIS for the SBLC was exhibited from 13 September 2017 until 8 November 2017. While this complied with the statutory minimum timeframe of 28 days, many stakeholders complained that the time provided was insufficient to fully scrutinise a project with such significant implications. For example, the City of Canterbury-Bankstown – one of the most important stakeholders – requested an extension until 1 December 2017 on the basis the EIS comprised around 5,000 pages and more time was needed the enable a submission to be adopted by Council.<sup>22</sup>

In June 2018, a Preferred Infrastructure Report was released which responded to community feedback from the EIS. The Preferred Infrastructure Report noted at p. iii:

The Department of Planning and Environment received 563 submissions during the Environmental Impact Statement exhibition period. Of these submissions, 13 were from government agencies and other key stakeholders. The remaining 550 submissions were received from members of the local community, interest/community groups, and businesses. Key issues of concern to the community included:

- project need and justification
- alternatives to the project and Sydney Metro as a whole

. . .

As explained above, any submission that the Government undertook a proper community consultation process should be rejected. Two of the key concerns raised by the community were the need for the project and alternatives to the project. However, those issues had already been determined by at least 2015 when the Government declared the project to be 'critical state significant infrastructure'.

 $<sup>^{20}</sup>$  Environmental Planning and Assessment Act 1979 s 5.16 (formerly s 115Y), s 5.17 (formerly s 115Z) and s 5.18

<sup>&</sup>lt;sup>21</sup> Environmental Planning and Assessment Act 1979 Schedule 1 cl 12

<sup>22</sup> https://haveyoursay.cbcity.nsw.gov.au/SydenhamtoBankstownMetroEnvironmentalImpactsStatementEIS

# Specific concerns regarding the project

#### Transitional arrangements and construction impacts

I have significant concerns regarding the transitional arrangements and construction impacts associated with the SBLC.

The current plan for the transition period involves replacing trains with buses during periods of construction. I am concerned this will have significant impacts on local residents, particularly older people and people with disability.

I do not believe enough information has been provided about these impacts to local residents. I believe more outreach should be undertaken to people from culturally and linguistically diverse backgrounds to ensure people from these communities are prepared for the disruption they will experience during the construction period.

#### Station design, interchanges and associated development

The Sydney Metro promises to upgrade every station in my electorate and provide new interchanges with other transport services. While this is welcome in theory, there is a lack of detail regarding these upgrades or how they will interact with precincts surrounding stations. Given the extent of development proposed around the Waterloo Metro Station, I have significant concerns about the extent of development which may ultimately be incorporated as part of these station upgrades.

#### Integration of the Metro with existing stations

I have some concerns about the integration of the new driverless Metro system with the existing station infrastructure. The Metro which has been built in Sydney's north west uses stations which were custom-built for the Metro's driverless technology. I am concerned that merging this new technology with the existing stations may lead to frequent glitches and technical problems (for example: doors on trains not aligning correctly with barriers on stations).

# Sydney Metro: A Trojan Horse for overdevelopment

As detailed above in relation to the Waterloo Metro Station, the Metro project appears intricately linked with the present Government's goals for new housing development.

I believe that any new housing development should be supported by public transport services. I also believe that it is important that long-term plans should exist to align future housing developments with investments in infrastructure and services. However, I do not support the approach the current NSW Government has taken in relation to planning connected with the Sydenham-Bankstown conversion.

#### Recent population growth in the electorate of Canterbury

The table below shows the growth in the estimated resident population of suburbs in the electorate of Canterbury over the last five years.<sup>23</sup>

Suburb	Year				Increase	
Subuib	2014	2015	2016	2017	2018	Percentage
Campsie - Clemton Park	25,781	26,481	27,245	28,045	28,540	10.7%
Canterbury	7,106	7,332	7,571	7,992	8,245	16.0%
Belmore	13,315	13,320	13,306	13,475	13,612	2.2%
Earlwood	18,464	18,642	18,771	18,959	19,117	3.5%
Hurlstone Park	4,386	4,409	4,463	4,592	4,694	7.0%
Roselands	11,806	11,888	12,165	12,274	12,352	4.6%
TOTAL	80,858	82,072	83,521	85,337	86,560	7.1%

### Future population growth in the electorate of Canterbury

There have now been three plans released which promise massive population growth:

- 1. The *Sydenham to Bankstown Urban Renewal Corridor Strategy* promised to build 35,000 new dwellings in suburbs along the rail corridor;
- 2. The Greater Sydney Commission's *South District Plan* promises 83,500 new dwellings, with the majority concentrated around the rail corridor; and
- 3. Canterbury-Bankstown Council's *Connective City 2036* draft plan promises to build around 50,000 new homes to accommodate 140,000 extra people by 2036.

All of these plans justify growth by reference to the Metro.

<sup>&</sup>lt;sup>23</sup> Australian Bureau of Statistics Regional Population Growth data compiled by .id: https://profile.id.com.au/canterbury-bankstown/population-estimate

In relation to Canterbury-Bankstown Council's *Connective City 2036* draft plan, the Mayor has complained that the targets were set by the NSW Government.<sup>24</sup> Canterbury-Bankstown Council is legally obliged to adhere to the targets set by the Greater Sydney Commission.<sup>25</sup> Nevertheless, the *Connective City 2036* draft plan details problems with the targets set by the Greater Sydney Commission. Page 72 of *Connective City 2036* states:

The Greater Sydney Commission has established short, medium and longer-term housing targets that equate to an average 2900 new dwellings per year.

Testing the number of dwellings being built per year against projected demand over 20 years finds that the number of dwellings needed each year will be lower than the Greater Sydney Commission target, even when including growth stimulated by Sydney Metro.

From January 2016 to April 2019 there have been 7,000 dwellings completed, resulting in an average of around 2,000 dwellings per year.

Based on past performance of the market, our housing study indicates Canterbury-Bankstown has the demand to contribute up to 39,350 new dwellings by 2036.

The implied target for Canterbury-Bankstown in the South District Plan is 58,000 new dwellings by 2036. To achieve this, the market would have to deliver more housing per annum than it did in the recent housing boom.

This indicates that it will be challenging to meet the Greater Sydney Commission's target of 2900 dwellings per year.

In light of that, the [Local Strategic Planning Statement] will aim to provide capacity for 50,000 new homes to align more closely with the South District Plan and create flexibility for additional take up, should that occur.

(Emphasis added)

I believe the targets set by the NSW Government through the Greater Sydney Commission are contrary to the *Greater Sydney Commission Act 2015*. Section 9 of the *Greater Sydney Commission Act 2015* states the Commission's functions include:

 Promoting orderly development which integrates social, economic and environmental considerations with regard to the principles of ecologically sustainable development;

<sup>&</sup>lt;sup>24</sup> Canterbury Bankstown plans for 500k residents, Canterbury-Bankstown Express, 25 September 2019

<sup>&</sup>lt;sup>25</sup> Connective City 2036 is a Local Strategic Planning Statement. Section 3.9(3A) of the *Environmental Planning and Assessment Act 1979* provides that councils in Greater Sydney can only make a LSPS if it is "consistent" with the plans created by the Greater Sydney Commission.

- Supporting ongoing improvement in productivity, liveability and environmental quality; and
- Providing increased opportunity for public involvement and participation in environmental planning and assessment.

Setting targets for new housing construction which exceed the levels reached during the recent construction boom is clearly inconsistent with these goals.

The approach taken to planning by the NSW Government through the Greater Sydney Commission will concentrate new developments in areas like the Sydenham-Bankstown Corridor, while shielding wealthy areas in Sydney's east and north.

The Greater Sydney Commission's District Plans envisaged building the following additional households between 2016 and 2021:

Local Government Area	New Homes to be built by 2021
Mosman	150
Hunters Hill	300
Woollahra	300
Canterbury-Bankstown	13,250

I believe the disparity between these targets shows the NSW Liberals are determined to concentrate new housing development in areas which generally support the Labor Party, because this will shield the NSW Liberal Government from political consequences arising from the community reaction to overdevelopment.

The willingness of the NSW Liberals to 'play politics' with planning can be seen in the 'Assurance Review' which was used to protect the Member for Ryde, Victor Dominello, from community pressure in the lead-up to the 2019 State Election.<sup>26</sup>

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<sup>&</sup>lt;sup>26</sup> Housing not matched by infrastructure - says government review released in comments, Sydney Morning Herald, 6 March 2019

#### Conclusion

The population growth Canterbury has already experienced has not been accompanied by investments in our local schools or Canterbury Hospital. While \$1.6 billion is being spent to convert our existing rail line to a Metro, no funding commitments have been made for other services or infrastructure.

I am concerned the Metro is being used to justify development, and that while many planning documents have been generated in connection to the Metro, no funding has been committed to ensure residents will have access to the quality of health and education services they deserve.