Sent: Friday, 31 March 2017 10:01 AM
To: GSC Campaign Engagement Mailbox <engagement@gsc.nsw.gov.au>
Subject: Submission on Draft West Central District Plan

Attached is my submission on the above Plan.

Sincerely
Submission to GSC – Draft West Central District Plan

Public awareness needed

There needs to be far more community consultation about the planning process as a whole if it is to be a success. When “desired future design characteristics” are undocumented, but used by Councils as a reason to override controls clearly set out in Development Control Plans, planning decisions are presently incomprehensible to the community, and that is an untenable situation in the longer term.

GSC is part of the centralised planning system. Instead of pushing a fixed position, as it is now doing, GSC should be presenting a balanced case for its proposals, with options and reasoning if it is to have genuine public credibility. The hype and PR spin put out to date is heavily biased. Accordingly it needs to address issues and perceptions such as those below to assist in bringing community opinion along with it.

Reduced immigration will reduce demand

GSC is part of a broad Government push to convert Sydney into a high and medium density metropolis. That push is not a response to citizens’ needs, but to a developer-driven agenda.

As with the rest of the planning bureaucracy, GSC’s starting point is an assumption that Sydney’s population growth is inevitable and requires centralised planning. It wants to tell people how and where to live. It wants to turn low density zones into medium density. It wants to do away with freestanding homes on their own blocks of land – except in wealthy neighbourhoods of course.

The argument is that Sydney must be “densified” to cope with increased population. But that argument is flawed.

GSC’s own figures show that population growth is largely driven by immigration, and immigration is controllable through government action. There is a whole range of options to deal with immigration, including decentralisation under strict conditions. Yet there has been no discussion or debate about that solution. GSC is starting from the assumption that large population growth is inevitable. In truth it is only inevitable in the absence of open debate and strong government in relation to immigration and foreign non-resident ownership of property.

Higher density should not be an aim in itself.

There is also an underlying theme that higher density is desirable of itself. If there are areas where higher density results in greater quality of life, then they are few and far between. Perhaps some examples exist in apartments at the very high end of the market, but these GSC initiatives are claimed to be necessary to increase housing stock, thereby making housing more affordable – in all segments of the market not just at the top end.

Therefore it is more likely that higher density will result in a deterioration in the urban environment and amenity. Simple observation shows how even quality developments deteriorate after a few years - with laundry drying on balconies, streets crowded with cars, letterboxes stuffed with junk mail, and rubbish of all kinds strewn around. Neighbourhoods take on the look of ghettos or slums. The photos below illustrate the point. It beggars belief that Government is deliberately planning to expand this type of future throughout Sydney.
Although clothed in sugary platitudes about productivity, choice of housing, liveability of our communities, the quality of our built and natural environment and so on, the real underlying agenda is increased density for Sydney. The developers’ dream replaces the Aussie homeowners’ dream. It is a developer-driven agenda.

The fact is that, whether developers, politicians and planners like it or not, most people prefer a low density residential lifestyle with freestanding houses on their own block of land. They resent having that amenity eroded by bureaucratic planning processes telling them it is important for newer residents to have easy access to transport corridors, roads, rail, schools, shops, hospitals, water and power infrastructure and so on. In other words, all the things they value about their area.

And, despite the fact that these are all facilities home owners have collectively paid for over the years, they are supposed to be happy about having their low density residential communities trashed, with established property owners being gradually crowded out so others can enjoy those facilities.

There cannot be a shortage of supply unless there is excess demand. The mantra of a supply shortage means nothing unless there is demand. If there is a genuine demand for high density living of itself, it will exist no matter where the supply occurs. So it should be perfectly viable to create new greenfield high density areas for people to enjoy in outlying areas or regional centres. There should be no automatic assumption that Government’s desired increase in density has to occur in proximity to existing services and that low density living has to be pushed out as a result.

Blacktown LGA is currently promoting some new suburbs. These appear to be low density developments. If there is a genuine demand for medium density living, why is it not a prominent feature of these developments?

**Low density should mean low density.**

Planning documents from DPE and GSC show scant regard for low density residential living, where houses are “detached” – ie freestanding on their own block of land. Owners value this lifestyle and enjoy their backyards, flower and vegie gardens, kids play areas, clotheslines, off-street parking for cars, caravans, boats and so on. But where is the provision for meeting this need in the Plan?

This lifestyle is already under attack by planners who regard these areas as suitable for urban renewal or infill. The draft Central West District Plan notes that there is a high level of detached housing and implies that this must be corrected. It ignores the obvious but inconvenient fact that people prefer this type of lifestyle – that is precisely why these areas existed in outer Sydney when they were first developed. And they are still a popular and preferred home choice.

Many of these properties are now referred to as older housing stock (note the subtle implication that they must be replaced), regardless of the fact that most still have decades of useful life in them. Elsewhere amongst the spin about the joys of higher density, claims are made that it is more sustainable. That is hard to swallow when the environmental cost of demolishing perfectly sound dwellings and carting truckloads of material to tips is considered. It is silly to talk about sustainability in that context.

Sneaky plans, such as changing LEPs to allow dual occupancies, already erode the amenity of many low density areas, as do unnecessarily high housing targets to pressure Councils to comply. It is grossly inequitable to have LEPs permitting medium density dual occupancies in some, but not all, low density zones. Fairness requires either that:
- LEPs currently allowing any form of medium density development in low density zones be amended to remove that provision; or,
- All LEPs be amended to allow dual occupancies in low density zones.

When LEPs are on public display there is little effort made to alert the affected community to the subtle changes being introduced in the fine print, and to the major impact they are likely to have when implemented. A more transparent approach is required if local democracy is to be maintained.

Classifying medium density development as complying development is another sneaky trick. The associated talk about the missing middle and policy gaps is nonsense. There is a policy applying to medium density development, but it actually provides a democratic principle giving neighbours a right to object. However that democratic right is now seen as an “obstacle” which must be removed.

**Indecent rush for higher density**

GSC’s logic is inconsistent and the spin changes to suit its intent. On one hand it says new higher density development should occur near transport:

*Urban renewal provides opportunities to focus new housing in existing and new centres with frequent public transport that can carry large numbers of passengers – meaning that more people can live in areas that provide access to jobs and services.*

On the other it says it should occur where it is not within walking distance of transport:

*Many parts of suburban Greater Sydney that are not within walking distance of regional transport (rail, light rail and regional bus routes) contain older housing stock. These areas present local opportunities to renew older housing with medium density housing.*

So, poor old low density living doesn’t get a look in anywhere. Neither in walking distance of transport, nor beyond walking distance. And, of course, “local opportunities to renew older housing with medium density housing” assumes that low density zones will be converted into medium density.

Another example - to deal with those naughty detached dwellings, GSC has a “plan for housing diversity”. It says:

*Existing stock in the West Central District is dominated by detached dwellings, although recent development has seen growing proportions of multi-unit dwellings. Cumberland and Parramatta Council areas have the highest proportions of existing multi-unit stock and also have the highest levels of growth in multi-unit dwellings.*

Despite that, GSC says Parramatta must nevertheless have targets greater than 40% of the District’s total. Why? This is much higher than any other; Blacktown is next highest at 26%. Do residents have to be penalised if their Council is already doing better than average?

On the other hand GSC’s logic is:

*Blacktown and The Hills Shire have high proportions of existing detached dwelling stock, and completions in these local government areas continue to be dominated by detached dwellings. There can be however a mismatch between supply and housing need.*

Again the implication is that dominance by detached dwellings is very naughty even though it is expressing genuine market demand by people actually living in the area. Apparently GSC can determine a “need” for attached (medium density) housing where the market does not. How can there be a mismatch if it has arisen due to market forces (demand) because buyers have valued low density residential living with detached freestanding houses and continue to do so. The mismatch is a figment concocted in the imagination of planners looking at maps without having to live amongst the results of their idea of “need”.

GSC also says:

*Where dwelling stock is mostly detached and the ageing population is expected to grow, there will be significant growth in demand for smaller homes.*

Here we go again. First, where is the evidence that older people all want smaller homes? Recent reports say less than 15% might do so. Second, one thing older people do want is single level housing. That is best provided by detached dwellings. Attached dwellings are predominantly two storeys. Why not let the market decide rather than accept a central planning assumption as gospel?
Population projections overstated

GSC is starting from the assumption that large population growth is inevitable. That assumption is incorrect because immigration is controllable, as mentioned above. But put that aside for the moment.

GSC supports its assumption with population projections. To be serious about it we need to go to basics – how big is the problem and what facts are relevant? The following comments are based on material supplied, or presented as relevant, by GSC.

These projections are derived by assumptions about variables such as fertility rates, births, deaths, and migration. They are not precise predictions of the demographic future and can be influenced by a wide variety of social, economic and political factors. They can be changed dramatically by changing those assumptions.

In “A Plan For Growing Sydney 2014” we were told Sydney’s population will grow by 1.6 million people over 20 years, with 900,000 of this population growth occurring in Western Sydney. Sydney therefore needed 664,000 new homes.

In 2016 the projections changed to 1.74 million people over 20 years with 1.015 million in Western Sydney districts needing 725,000 new homes.

GSC explains that this is due to an increase of 9% in projections, but does not explain what variables were changed to do that.

So, by simply changing assumptions, the height of the bar has been moved from 1.6 million to 1.74 million extra people. But the projections don’t actually add up to an increase of 1.74 million at all. It is an overstatement.

That figure (1.74 million) is the forecast net overseas migration for the whole of NSW (not just Sydney) over 25 years (not 20 years).

So GSC’s starting point is that 25 years of net overseas migration into the whole of NSW has to be crammed into Sydney. Why? Where is there any realistic discussion about alternatives – new growth centres, regionalisation, decentralisation? Dare it be said – reducing immigration?

These questions are ignored and GSC explains that it has padded the population growth figures to be on the safe side. It then goes on to use that padded starting point to set housing “targets” which Councils will be expected to deliver. And even those targets are themselves padded again.

GSC is using housing targets higher than shown in its projections. In at least 4 of its 6 districts GSC has set targets exceeding projections by between 4.8% and 16.3%. No clear reason is given for this overstatement. It looks like crying wolf.

GSC’s proposals are inequitable.

The pain of growth is not being shared equally. The Hills and Parramatta are both already meeting their housing targets. But GSC is working on an increase of around 75% in population of these LGAs over the next 20 years. Woollahra’s increase is just 3.5% in the same period. The total increase for Greater Sydney is 37%, yet The Hills and Parramatta are about twice that figure. It’s fair to ask - why the inequity?

Speaking of inequity, again it’s fair to ask why is Government jumping to the conclusion that it has to selectively attack the property rights and lifestyle of those enjoying low density living by converting low density zones into medium density? This approach has the fingerprints of a developer-driven agenda all over it.

The Government plans to fast track development by removing neighbours’ right to object, which is described as “removing obstacles” in the development process. This will be done by classing medium density development as “complying development” which will then not need a DA to Council. In some areas like The Hills and Parramatta this will allow medium density dual occupancies to go up in low density residential areas without DA or right of objection.
In December last year the Prime Minister, as he has also done since, touted the need to increase housing supply in Sydney by removing obstacles in the planning assessment system (code for removing neighbours’ rights to lodge objections to DAs). He cited how well this has worked in Queensland. Ironically, that very night, A Current Affair ran a story about the plight of a landowner in Queensland where massive multi storey unit blocks went up next door, balconies directly overlooking his bedroom and yard, and he had no right to object at all. This is apparently a desirable approach to democracy, at least as far as developers, politicians and planners are concerned.

In the interests of equity, perhaps this system should be trialled in Point Piper first.

**Housing Affordability – demand driven.**

The term “housing affordability” has now taken on a life of its own in the feel-good political cosmos. But the simple fact is that buying your own home has never been easy for most people. Sacrifices and hard slog have always been required. And buyer expectations are so much higher now than ten, twenty, thirty years ago.

So the fact is that comparing average house prices with those in previous decades is comparing apples and oranges. The price today is either for a multi bedroom home with ensuites and walk in wardrobes, home theatres, landscaping, pool and all modern appliances (preferably imported), or for a knock down rebuild as a new home or, more likely, as an investment property. That has not always been the case. Enhanced buyer expectations are a real, but rarely mentioned, factor in increased prices.

The issue has to be seen in that context. But if there is any credible basis for the claim by the vested property interests (and echoed by government at all levels) that increased supply will make housing more affordable, it should be made public for discussion.

Supply has been increasing for many years, but the result is higher house prices. What grounds are there for claiming that further supply will turn prices around? Developers maximise their return from the market, and that is driven by demand. Unless demand is reduced, prices will rise.

At present the main drivers of demand are historically high levels of immigration, and foreign buying, coupled with historically low interest rates. Add generous tax incentives for real estate speculation and you create the buyer frenzy which has been pushing prices higher. It is also increasing the risk of debt default when economic conditions change for the worse.

All these drivers of demand can be controlled by government. The first step is to reduce immigration to more sustainable levels in order to ease pressure on the market. The second step is to disallow foreign non-resident ownership of property. These would allow a quieter, more rational debate about Sydney’s future, and that of the State as a whole.

We should be considering a Greater NSW, not just a Greater Sydney.

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