

Mrs Lucy Turnbull
Chief Commissioner
Greater Sydney Commission
PO BOX 257
Parramatta NSW 2124

15 December 2017

Dear Mrs Turnbull

Submission to the Greater Sydney Region Plan and Revised District Plans

The Property Council of Australia welcomes the release of the draft Greater Sydney Region Plan and the Revised District Plans as documents that further strengthen Sydney's strategic planning outlook.

The Property Council and its members have worked closely with the Greater Sydney Commission over the past 12 months to refine and provide input into the policy work that has informed these documents.

We welcome the fact that much of the industry feedback that has been provided has been weaved through these documents particularly in how they frame issues such as the viability of affordable rental housing targets, employment land management, new housing options such as build-to-rent and the integral role and resourcing of local government.

The Property Council acknowledges the need to meet the needs of a growing and changing population by transforming Greater Sydney into a metropolis of three cities – the Western Parkland City, the Central River City and the Eastern Harbour City. Our city's growth must be equitable, and this requires the strategic planning we see through these documents to be translated into the Local Environmental Plans (LEPs) of local government and the plans of other local planning authorities and subsequently, their planning actions.

We also fully support the concurrent release of the NSW Government's Future Transport Strategy 2056 and soon to be released Infrastructure NSW's State Infrastructure Plan to align land use, transport and infrastructure outcomes for Greater Sydney.

The Property Council provided substantial submissions to the initial draft District Plans and this submission will not reiterate information already submitted, but rather touch on important issues that still require further detail or clarification. Subsequently, this submission should be read in conjunction with our submissions on the draft District Plans and Future Transport Strategy 2056.

Value Capture and Financing

We know that Government revenue can only meet a certain percentage of infrastructure expenditure. Currently, the funding gap is met through local government rates, Section 94 levies for local infrastructure, Voluntary Planning Agreements, and Special Infrastructure Contributions in growth areas for significant infrastructure necessitated through population growth and development. Additional funding for larger rail projects can often be met through public/private partnerships (PPPs), yet there is a growing demand for new infrastructure and government revenue is constrained and largely reliant on property related stamp duty and a buoyant property market.

NSW Government economic modelling projects that, if current trends continue, overall expenses will grow at 5.3 per cent a year and reach 15.9 per cent of GSP by 2056. Long-term modelling suggests that State Government revenue growth is likely to fall over the next 40 years to 4.7 per cent a year. That is well below the expected growth in services and infrastructure expenditure of 5.3 per cent a year and presents a significant challenge.

The Region Plan acknowledges the complexities of finding a value capture model that can contribute to the cost of infrastructure without financially undermining new development;

“The Commission recognises that development needs to support the funding of infrastructure at an appropriate level, but should not be unreasonably burdened to the extent that development becomes unviable.” P 29

The acknowledgement of this issue is welcome, yet consistency and transparency in approach is required. As outlined, there are a myriad of financing and value capture schemes that should be condensed with one scheme adopted, if needed, that encompasses both local and state infrastructure. The first step in this process is gaining oversight of what development costs are across the Greater Sydney area and the Commission acknowledges this;

“this solution relates to industry and governments being certain of cumulative development costs. The Commission has therefore identified the need for Government to prepare guidance to address the cumulative impacts of development contributions on development feasibility and delivery across Greater Sydney.” p 29

In July 2017, the cap on Section 94 contributions was abolished. The cap on contributions will increase by \$5,000 on 1 January 2018 to \$35,000 in greenfield areas and \$5,000 to \$25,000 in infill areas, and from 1 July 2018, an annual \$5,000 increase to the caps each year for two years applies.

The caps will be removed entirely in these areas on 1 July 2020 (although councils will still need to have contribution plans vetted by IPART before the caps can be breached).

The Property Council has commissioned research to ascertain how many and which councils are likely to seek to impose contribution plans in excess of the caps. Currently, no composite list of section 94 plans exists to enable policy makers to ascertain a comparison of what infrastructure charges councils are applying across NSW (or Sydney).

While section 94 plans are publicly available (on council websites) this information is fragmented, making it difficult to truly ascertain the potential for infrastructure costs to rise or to compare what and how councils use developer levies to fund infrastructure.

The Property Council's research aims to increase transparency of section 94 developer levies to enable policy makers to examine both the macro as well as micro composition and impact of these charges.

Following full oversight of development contributions being achieved, the Government must take a leadership position on this issue and be clear with both industry and the community on what will be levied, where it will be levied, for how long and what is being funded. A careful and prudent approach is required.

Four key aspects that need to be addressed to improve the operation of levies are:

1. industry needs certainty of costs to enable it to make investments. Developers are unable to assess the feasibility of projects if the cost of developer levies is unknown.
2. downward pressure should be maintained to minimise the cost of local infrastructure, some councils are more efficient in procuring or delivering infrastructure, their experience and knowledge should be shared across local government.
3. the NSW Government should be an ongoing partner in funding local infrastructure to support growth, representing a contribution from the broader community to invest in building future cities and communities.
4. The state government should reintroduce the Local Infrastructure Growth Scheme to meet the gap in the cost for infrastructure; between cost and what is met through rates, levies and other schemes. The reintroductions of LIGS will lift financial pressure on the community and reduce the reliance on local government levies.

Expectations about the type of infrastructure that will be provided and when must also be managed. The community currently has high expectations for amenity in rapidly growing communities. Yet this must be balanced with achieving affordable housing and lower costs of living more generally. Good strategic planning at a local level is critical to ensure a greater number of dwellings in certain areas is matched with suitable infrastructure with social infrastructure given precedence.

While the NSW Government has developed an 'Essential Works List' to clarify what infrastructure councils can include in contribution plans, this list is only applied if councils seek to breach 'caps' and the cost of infrastructure is assessed by IPART in terms of whether it is a 'reasonable estimate'.

The Property Council believes more assistance and guidance should be provided to councils to put downward pressure on costs, including the release of best practice guidelines to guide councils and incentives offered (potentially access to finance) to encourage councils to explore regional infrastructure solutions with neighbouring councils to achieve economies of scale.

Increased growth in parts of Sydney, particularly in our city's west and south west, is increasing infrastructure costs and subsequently increasing the amount levied on new dwellings. This

subsequently increases costs for the local community, often in areas where households can least afford it. The NSW Government must provide funding for infrastructure in these communities to assist councils. This should be done by the reintroduction of the Local Infrastructure Growth Scheme that was disappointingly abolished in 2017.

Recommendations

- **Record, monitor and make public all development contributions from across Sydney.**
- **Reintroduce the Local Infrastructure Growth Scheme so that the NSW Government can play a larger role in local infrastructure provision.**

Collaboration and Governance

An effective governance structure to ensure that the Region Plan and District Plan's ambition can be transferred into practical outcomes is vital. Metropolitan Sydney has had a long line of strategic planning documents that have contained viable ideas for future growth, yet all have lacked governance structures to provide practical outcomes.

There are four different models for organising and providing structure to Sydney's planning; Western Sydney City Deal, the suite of Collaboration Areas and the Priority Growth Area and Priority Precincts. The critical component of any of these approaches is buy in from local government, and the timely updating, implementation and monitoring of local government strategic plans.

Collaboration areas must include incentives for meeting planning or growth targets, and consequences for not. Organising principles without checks and balances will be ineffective. To support this approach, in addition to including details on what government body is responsible for planning actions, the plans should also stipulate what body is accountable for each action. This approach will improve transparency as compliance against the actions can be more easily assessed.

LEPs should also contain mapping and development capacity out to 2036 to provide the industry and the community with a realistic development outlook. Development capacity should consider constraints such as heritage, current zoning, site amalgamation, fragmented ownership, existing strata titled buildings and the Urban Feasibility Model.

Mapping will provide a realistic picture of the capacity to reach housing and job targets in the long term and provide for accurate reporting on local planning for the Greater Sydney Commission. This also assists in communicating the vision of the District Plans and what can be achieved under the current system to the community, the people who will be most affected by new development, transport corridors and population increases.

LEPs are intended to be updated every five years, in line with the review of the District Plans. However, there is no clearly established, or reported, mechanism for monitoring the review of LEPs. As a result, many LEPs in NSW have been in place for up to a decade without review. The NSW Department of Planning's Local Environmental Plans; A guide to preparing local

environmental plans LEPs outlines benchmark timeframes that have been set for preparing different types of LEPs where they are consistent with the state's strategic planning framework:

- administrative changes and errors – 3 months
- minor spot rezoning – 6 months
- major land release and urban renewal – 12-18 months
- principal LEPs – 24 months

Based on these benchmarks, the timely provision of rezoned land through a revised LEP would take years and anything non-conforming in nature (not giving effect to District Plans) would likely take significantly longer. Ideally, the onus should be placed on councils to update their LEPs every five years or have them suspended, with applications considered against District and Regional Plans instead.

Recommendations

- **Introduce development mapping and development capacity out to 2036 in LEPs.**
- **Include checks and balances for good and bad performance within governance structures.**
- **Accountability for actions must be included in plans.**

Infrastructure and Collaboration

Objective 1. Infrastructure supports the three cities.

Objective 2. Infrastructure aligns with forecast growth infrastructure compact

Objective 3. Infrastructure adapts to meet future needs

Objective 4. Infrastructure use is optimised

Objective 6. Services and infrastructure meet communities' changing needs

The Property Council welcomes the coordinated focus the GSC places upon the delivery of infrastructure.

New housing and economic growth requires new infrastructure. Social infrastructure such as hospitals and schools must be provided where the community requires them as must local infrastructure such as arterial roads, green spaces, libraries and community spaces and buildings.

The sequencing of this infrastructure with growth is critical to ensuring the community has the infrastructure it needs. The provision of infrastructure must be linked to clear metrics on population growth, cost and infrastructure priorities including the revised State Infrastructure Plan.

The expectations of the community must also be managed, and clear information provided on how decisions are made and the expected outcomes. Meeting growth with infrastructure will become an increasingly important issue, both socially and politically, over the coming decade

and the Commission has an important role to play in explaining the process for planning and delivering infrastructure to the community.

Aligning utilities

It is a welcome development that the Future Transport Strategy 2056 has been aligned with the Region Plan and District Plans and the State Infrastructure Plan. The next logical step is to also align the strategic plans of major utilities such as water and electricity. This could be done every five years to align with the Australian Energy Regulator making determinations on revenue proposals. Aligning the strategic plans of the major utilities will provide certainty to providers looking to service land in addition to servicing priority land more efficiently.

Recommendation

- **The provision of infrastructure must be linked to clear metrics on population growth, cost and infrastructure priorities including the revised State Infrastructure Plan.**
- **Utility strategic plans should be aligned and potentially integrated with GSC strategic plans and Future Transport Strategy.**

Liveability

Objective 10. Greater housing supply

The NSW Government has identified that 725,000 new homes will be needed to meet demand based on current population projections, to 2036.

A driving factor to increasing housing supply is instilling consistency and transparency into NSW's planning system.

Approvals and completions of dwellings have increased in recent years, yet the extended process of developing housing from start, when land is released, to end when a dwelling is completed must be examined to identify areas where improvements can be made and instil consistency and transparency in the planning system. Time delays, high costs and fluid policy in the planning system undermine the development and delivery of housing

Recent Property Council research shows that many dwellings are not progressing through the five-stage development process and are subsequently failing to make it to market. The five stages of land release are;

- when land is released for development,
- land is zoned,
- land is serviced with key infrastructure,
- approval for dwelling commencement, and
- dwelling completion.

The below chart shows the cumulative impact the inefficient process has on housing supply.

	RELEASED	REZONED	SERVICED	APPROVED	COMPLETED
Jun-07	108,180	50,063	33,899	16,820	14,715
Jun-08	106,521	61,224	30,167	17,732	13,862
Jun-09	131,057	68,636	35,578	13,636	13,041
Jun-10	132,134	86,949	43,845	19,310	13,293
Jun-11	146,166	85,511	41,986	22,440	14,722
Jun-12	154,167	89,012	42,195	24,460	15,104
Jun-13	160,741	111,406	45,882	30,375	20,339
Jun-14	168,361	128,311	47,211	39,090	22,750
Jun-15	161,358	144,359	56,199	46,766	27,348
Jun-16	160,597	140,701	83,991	54,723	30,191

Source: various DPE material; Metropolitan Development Program Reports, Greenfield Development Quarterly Reports and Department of Planning Metropolitan Housing Monitor Sydney Region (drawing on ABS data)

Greater oversight of these five stages is critical to ensure Sydney has enough dwellings **reach ??** market to meet demand. The Property Council recommends reintroducing the Metropolitan Development Program to monitor and forecast land supply in metropolitan Sydney including greenfield and infill areas.

Converting land, especially in greenfield locations where there may be no existing urban services, into house sites involves a number of stages and involves the Government, utility providers, councils and developers. Since 1981, this process was driven through the Metropolitan Development Program (MDP), the function of which was to monitor and forecast land supply in metropolitan Sydney and the Central Coast, including greenfield and infill areas.

Until recent years, the MDP had a major role in implementing the NSW Government's urban growth agenda by:

- Monitoring greenfield and infill stock, with the Department of Planning working with councils to identify dwelling potential in existing areas, especially from higher density and mixed-use locations
- Publicly releasing an annual audit of land stock (release, zoned, serviced, subdivided and for sale) at a Sydney metro, regional and LGA level, and assessing levels against set benchmarks

- Forecasting future land supply and dwelling production including production cycle, medium and term forecast, informed by Department of Planning consultations with the development industry.

Significantly, the MDP was underpinned by a process of collaboration both within the NSW Government, between planning agencies and utilities, and the NSW Government, local councils and the development industry

Disappointingly, the MDP was reduced in scale and scope from 2010/11 onwards, culminating in an abbreviated quarterly report last published in December 2015.

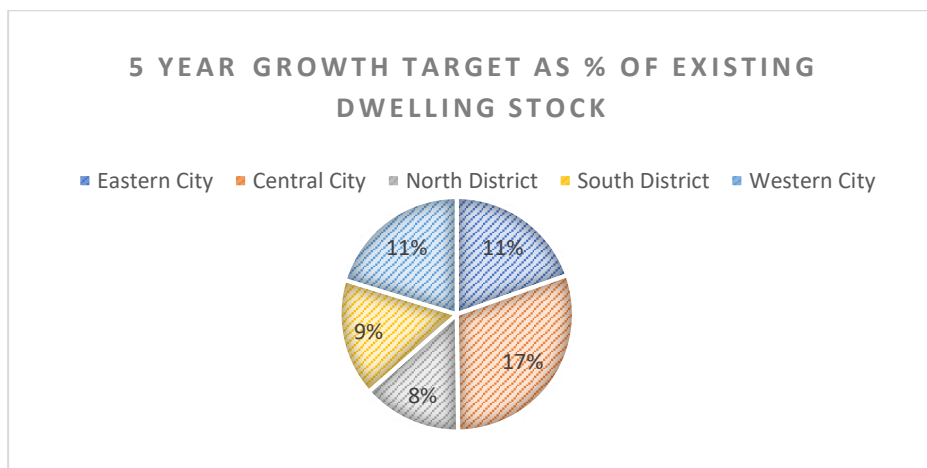
Housing strategies based on reliable data, both for the immediate future and the long term, are critical to ensure local government can be held to account and set and meet housing targets and a realistic outlook of housing supply is established.

The MDP should be reintroduced to provide a solid foundation of data and monitoring of land supply and development in metropolitan Sydney.

Recommendation

- **Reintroduce the Metropolitan Development Program.**

Action 3. Develop 6–10-year housing targets



The 6 to 10-year targets for LGAs will be critical to ensure a long-term pipeline of supply can be established, but their efficacy will be contingent on the resourcing and leadership of local government. A high rate of dwelling growth is expected, as a percentage of current dwellings, and the accountability and monitoring of this process is critical.

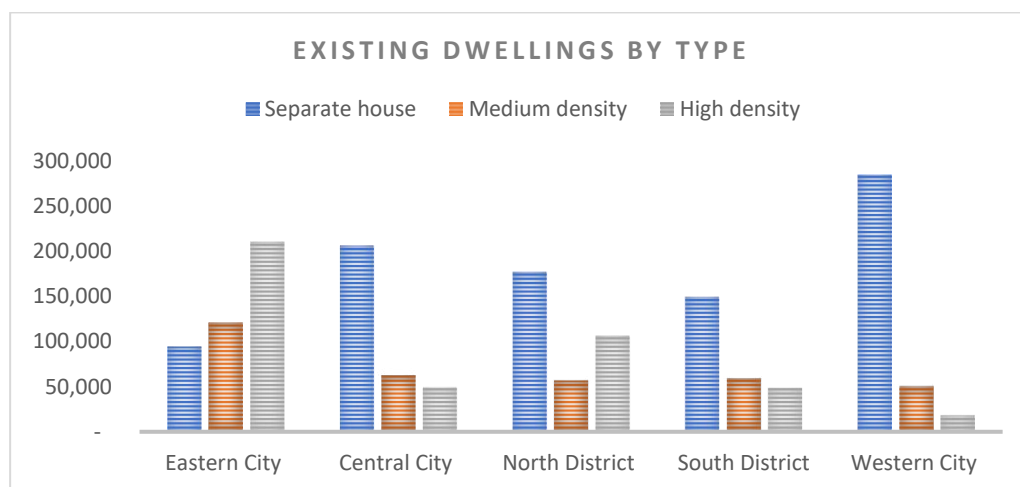
If 6 to 10-year targets are not formed and implemented within a designated timeframe, the progress made in the five-year targets will be lost. Additional resourcing that has been provided

to 10 Sydney councils is welcome, yet should be widened to improve a greater number of local planning systems and increase the positive impact. This resourcing should also be monitored to ensure outcomes are being achieved as a result of the funding.

The importance of Planned Precincts

The continuation and expansion of Planned Precincts is critical to future housing supply. Nearly half of all future housing supply needed to meet housing targets will come from Planned Precincts, about 323,000 dwellings by Property Council calculations. Planned Precincts provide a structure by which new housing can be sequenced with infrastructure and linked to a transparent financing approach. There will also be around 75,000 jobs provided through Planned Precincts, jobs important for Sydney’s growing population.

Objective 11. Housing is more diverse and affordable



A diversity of housing type and size is critical for the changing demographics of our city and to address affordability. Smaller lot sizes lead to lower house prices due to the high cost of land in Sydney. In addition to the medium density housing code supported in the Region Plan, code assessable development for apartments, including high-rise and mixed-use developments, should be implemented as available in other states and territories via a new SEPP and an associated state-government prepared development control plan (DCP) that would exclude local DCPs from applying (to the extent of any inconsistency).

Currently, higher density development is lacking in most districts and allowing code assessed development, particularly around transport infrastructure and emerging Strategic Centres, would ensure quality development while boosting supply and reducing prices.

Strategy 11.1 Prepare Affordable Rental Housing Target schemes

The Property Council appreciates the effort that has been made to engage with industry on the design and potential implementation of Affordable Rental Housing Targets.

The 5 to 10 per cent targets for affordable housing in the Region Plan and Revised District Plans must be delivered through incentives rather than disincentives to increase supply by ensuring they operate as an FSR and height bonus and not based on currently 'under-zoned' land.

It is encouraging that the viability test for the potential implementation of these targets must include the cumulative impact of all taxes and charges placed on development. It is also encouraging that:

"In order not to hinder the supply outcomes being sought and to not impact existing home and property owners, the viability of the targets would be calculated on the increased residential floor space in each case." p.57

Local government, however, can still set their own often higher targets and in some cases, may undermine housing supply and affordability in the process. The lack of a consistent approach and thorough oversight of viability tests across Sydney could also result in poor affordability outcomes as higher targets push up the cost of housing across the wider market. One consistent affordable housing target between 5 to 10 per cent implemented under SEPP 70 could be a more consistent and transparent approach to implementing this policy.

Recommendations

- **Code assessable development for apartments, including high-rise and mixed-use developments, should be implemented.**
- **The five to 10 per cent targets for affordable housing in the draft District Plans must be incentives rather than disincentives to increasing housing supply.**
- **Local government should not have the capacity to set higher targets than the 5 to 10 per cent target set by the GSC.**

Build to Rent

The industry is strongly supportive of increasing the supply of affordable housing through increasing the supply of residential rental through the build-to-rent sector. Leasing options should not be restricted to options greater than three years, as the Region Plan suggests, but should include all rental lease options, both short and long term.

There are initial steps that the NSW Government can take to ensure build to Rent becomes a viable sector in NSW

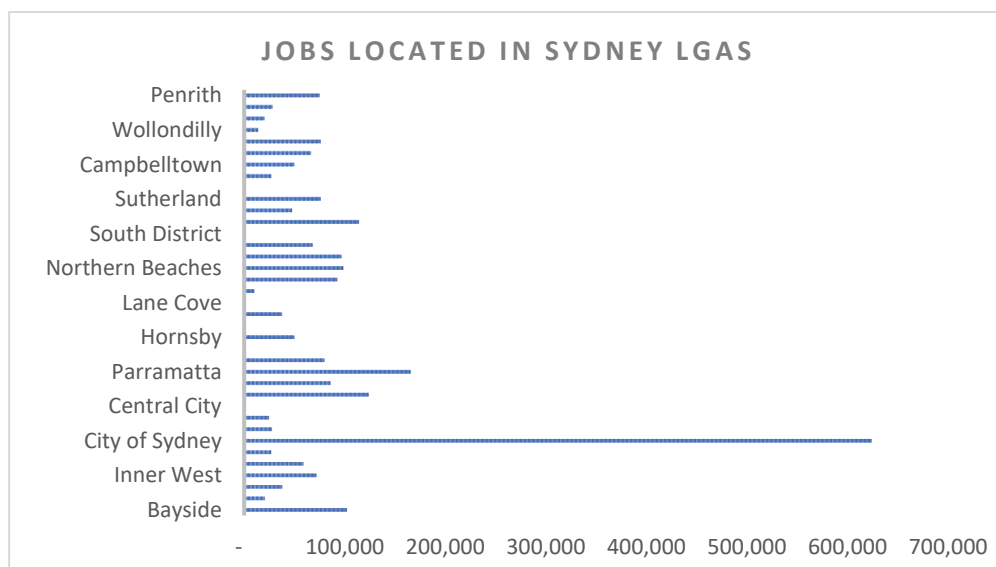
- Encourage the supply of affordable housing through emerging build-to-rent sector by contributing land through Property NSW land disposal programs. This approach is similar to **Strategy 11.2 in the Region Plan**.
- Establish a review as to how planning requirements will impact the viability of Build-to-Rent schemes such as minimum parking and unit mix requirements and SEPP 65 generally – focusing on the need for more one bedroom/ studios with good access to public transport and amenity.

- Establish a financing mechanism that could include development loans for Build-to-Rent developments and introducing a debt guarantee scheme for the construction of build-to-rent and the acquisition of established stock.

Recommendations

- **Encourage the supply of affordable housing through emerging build-to-rent sector by contributing land through Property NSW land disposal programs.**
- **Establish a review as to how planning requirements will impact the viability of Build-to-Rent schemes such as minimum parking and unit mix requirements and SEPP 65 generally – focusing on the need for more one bedroom/ studios with good access to public transport and amenity.**
- **Establish a financing mechanism that could include development loans for Build-to-Rent developments and introducing a debt guarantee scheme for the construction of build-to-rent and the acquisition of established stock.**

Productivity



Objective 16 Freight and logistics network is competitive and efficient

Strategy 16.1 Manage the interfaces of industrial areas, trade gateways and intermodal facilities

Strategy 16.2 Optimise the efficiency and effectiveness of the freight handling and logistics network

The division of centres into Strategic, District and Local Centres based on current economic investment and output and potential growth provides a logical structure to future development and guides investment. Dividing the 28 Strategic Centres outlined in a *Plan for Growing Sydney* into Strategic and District Centres is a more nuanced approach to potential future growth, but one that must not restrict future investment that at this stage is not projected or predicted in the District Plans or Region Plan.

Strategic Centres provide an opportunity to promote density, investment and a 30-minute city in the long term. Job targets for these centres are an important aspect to the District Plans to measure growth and investment. Local Environment Plans and planning documents from other government agencies must reflect and support the policy positions for centres as outlined in the Region Plan and District Plans.

Better planning for freight routes and productive employment land is also integral to our city's economic future and jobs in our growing districts. Preventing the encroachment of sensitive uses that can impact on these operations and ensuring transport networks can support the needs of the trade gateways is critical.

The language and approach outlined in the Region Plan and Revised District Plans is encouraging and reflects the concerns raised by the Property Council in our original draft District Plan submissions. The management of productive employment land and related freight infrastructure is integral to our city's future and the encroachment of sensitive uses without suitable planning could undermine economic growth and our international competitiveness.

Any approach to freight and employment land must include:

- A revision of the barriers the NSW environmental assessment, requirements, and policy framework places on the operation of industrial based industries and the affect encroaching residential development has on hours of operation and noise pollution
- Identifying and protecting corridors for rail, roads, fuel lines and utilities
- Strategically planning for intermodal terminals
- Sequential upgrades to existing roads and connection points to cater for future traffic and freight demand
- A plan for sequential land release and rezoning including the provision of trunk services to service land in advance of the operative Western Sydney Airport facility (in coordination with planning of infrastructure for the airport).

Recommendations

- **Revise the barriers the NSW environmental assessment, requirements, and policy framework places on the operation of industrial based industries and the affect encroaching residential development has on hours of operation and noise pollution.**
- **Strategically plan for intermodal terminals.**
- **Identify and protect corridors for rail, roads, fuel lines and utilities.**
- **All government policy, both State and Local, must reflect and support the Greater Sydney Commission's approach to Centres.**

Objective 20. Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City

The Western Sydney Airport is a major investment and the land surrounding the airport is integral to the area's economic success. The planning and structure plan for the Western Sydney Priority Growth Area and the Western Sydney Employment Area are integral elements. There is no guarantee that we will see the economic growth needed in the Western City unless the development of land in these areas is sequenced with servicing from trunk infrastructure and key roads. The District also has fewer major strategic centres that may attract jobs associated with business-to-business relationships rather than population serving urban services (Sydney's urban service land – establishing a baseline provision, SGS Economics, p 9).

The Property Council recommends a Development Corporation or similar body be formed to prioritise and coordinate the development of employment land in the area.

The body would:

- designate priorities, coordinate stakeholders, and provide certainty to infrastructure financing.
- prioritise sections of WSEA, providing both a timeline and strategic vision for the area. This will create certainty for major infrastructure providers and the industry.
- Provide the opportunity for sequential development and infrastructure provision.
- prioritise the redevelopment of local roads in addition to the main roads receiving state funding.
- coordinate and synchronise key stakeholders.
- provide certainty around financing including reinvesting levies received into local infrastructure.

- The employment lands development corporation must institute strategies for designated areas that are synchronised with a funding mechanism that provides a clear nexus between funding channels and infrastructure.
- This model must also supersede any existing value capture models that exist in the area including Special Infrastructure Contributions, Section 94 payments and VPA Conditions.

Recommendations

- **Introduce a development corporation or similar body to coordinate the development and servicing of employment land in Western Sydney.**

Objective 23. Industrial and urban services land is planned, protected, and managed

Serviced employment land is limited in Sydney with Greater Sydney only having two to three years of serviced industrial land supply. It is encouraging that many of the concerns the Property Council communicated to the Greater Sydney Commission concerning the original approach to employment land have been addressed in the Region Plan and Revised District Plans.

Strategy 23.1 Industrial land in the three cities is to be managed in line with the principles set out in this draft Greater Sydney Region Plan.

Eastern Harbour City - Protect all industrial zoned land from conversion to residential development, including conversion to mixed-use zonings. p112

This approach requires further detail and nuance. It is accepted and supported that the Eastern City plays a critical role as an economic gateway and employment land is a critical part of this. It is also important that a growing logistics sector has suitable land for efficient last mile deliveries. However, to protect all land outright with no assessment process guidance, to assess and decide on the rezoning of employment land, may undermine the efficient use of our city's land. A balance must be found between the protection of employment land and alternative uses for land.

There should also be a distinction between critical industrial land, that should be protected, and general urban services land that should be assessed on a case by case basis.

Critical industrial land should include Intermodal Terminals (Yenora, Enfield, Moorebank), Ports and land surrounding, Airports and land surrounding, Western Sydney Employment area. These lands intended use by strategic and heavy industries, including industries that form a key element of the supply chain for major resource projects. These industries generate significant investment, employment and value of production for the state.

General urban services land could include, for example, land used for Motor Vehicle and Motor Vehicle Parts Retailing Repair and Maintenance Printing (including the Reproduction of Recorded Media). This is the type of land that could be assessed on a case by case basis in the context of the metropolitan supply of this type of employment land.

Central River City: Considering the levels of supply and the transformation occurring across this city, the Commission will undertake a review of all industrial land to confirm its protection or transition to higher order uses (such as business parks) and appropriate controls to maximise business and employment outcomes considering the changing nature of industries in the area. p112

The Property Council and its members look forward to taking part and contributing to the review of employment land in the Central City. It is important that productive employment land in the Central City is well managed and potentially expanded.

The Greater Sydney Commission has proposed high level approach to managing employment land in the Central City. This approach will require further guidance for local government to ensure a whole of metropolitan city approach is considered when determining the potential rezoning of employment land.

This high-level approach as it currently stands, is likely to see the relevant local council (where the relevant planning authority) determine rezonings with greater regard to the impact on the local government area, as opposed to the relevant district of the Greater Sydney Region. This has the capacity to slow the planning process and undermine long term strategic planning.

Western Parkland City: Parts of this city are well established and need to be protected and managed in similar ways to the Eastern Harbour City. However, owing to the substantial long term projected population and development growth in greenfield areas there will be a need for additional industrial and urban services land. p112

This approach will require further guidance for local government. Critical employment land, such as that within the Western Sydney Employment Area, should be protected and developed with sequenced delivery of trunk infrastructure.

Assessing employment land

There must be a metropolitan wide approach to employment land, that sets out consistent guidelines for the assessment of non-critical employment land informed by industry and independent experts. If local governments are only provided with a high level, strategic approach then development may stall or suffer from flawed decisions. The Greater Sydney Commission, with a specific employment land taskforce, are in the best position to lead this work.

Sydney's urban service land – establishing a baseline provision

The Property Council would like to engage further with the Greater Sydney Commission on the approach to this research and the outcome. The Property Council feels further research must be done in this area to ascertain the economic value of employment land, based on its role in a wider supply chain, to support the depth of evidence used in managing employment land.

Recommendations

- **Further guidance and nuance is needed in the approach to employment land in the Eastern City.**
- **Further guidance is needed for local government to guide the management and growth of employment land in the Central and Western Cities.**
- **Create an employment land taskforce to guide the approach to employment land across metropolitan Sydney.**
- **Further research is needed into the economic value of employment land and contribution to supply chains.**

We look forward to discussing the issues raised in this submission further.

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