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### **PIA NSW Submission - Greater Cities Commission Six Cities Discussion Paper**

The Planning Institute of Australia (PIA NSW Division) is pleased to have an opportunity to respond to the Discussion Paper. Our submission complements feedback from our Young Planners Committee which has been submitted separately.

#### **Role of Greater Cities Commission**

PIA continues to advocate for an entity accountable for managing Greater Sydney / Hunter / Illawarra's long-term future as a place to live, work and thrive. The Greater Cities Commission (GCC) has the role of building the region's value and resilience - taking a spatial perspective on how the region can and should change in the face of climate constraints and social demands.

Planners value a coherent integrated land use and infrastructure plan which accumulates benefits, reduces investment risks and improves return on investment in infrastructure and service delivery. The Six Cities Region Plan should help align State and local strategy – improving predictability and community trust in development and infrastructure decisions.

PIA continues to support for the GCC as the responsible entity for the preparation and delivery of the region (and district) strategic plans and integrated infrastructure plans (via Infrastructure Delivery Committee – and involvement with City Deals). In effect, a 'place manager' for the region's future growth and change as anticipated under the original Act.

The GCC role extends to achieving outcomes for strategic precincts identified in the plans. The GCC provides an inter-agency advisory role and assists agencies to effectively deploy state resources towards these outcomes. This work is extending into precinct collaboration and related economic development functions linked to the Premier's priorities. The GCC also brings a distinct perspective

to thought leadership on carbon futures, employment, safety, Covid and Place-based Infrastructure Compacts.

Since 2018 the Commission has come under the authority of the Premier - with the advantage of bringing the delivery of the regional plan and its spatial vision into the centre of government. PIA reaffirms our earlier advocacy ([link](#)) that:

- *“The governance role of GSC should have a level of mandate to ensure that State Government infrastructure providing agencies coordinate their programs and budgeting with the Greater Sydney Region and District Plans.”*
- *“PIA supports the GSC maintaining an independent and flexible strategic planning leadership role to drive innovation and integration across infrastructure planning, funding and delivery. It should not become bogged down in the administration functions of planning and assessment.”*
- *“PIA supports a further discussion of the merits of a broader metropolitan governance role for a body like the GSC - and its potential to manage a Greater Sydney budget accessing special infrastructure contributions and other dedicated revenue streams from property.”*

With the publication of the Six Cities Region Plan Discussion Paper, it is timely to consider how the GCC can best achieve its role under the Act - and strengthen its accountability as a steward for the long-term success and resilience of the wider region.

### **Insights from Current Region and District Plans – and Expectations for Next Generation City Plans**

The current plans have established a regional structure and strengthened community support for integrated planning of land use and transport for the three cities and supporting districts. Supportive observations include:

- Local Strategic Planning Statements have improved the alignment of local and State strategy.
- District Plans have provided a valuable link between State and Local strategy – there is a risk that City Plans rather than District Plans may lose the resolution needed to identify specific place outcomes or respond to different sub-regional needs.
- Housing strategies have identified and promoted a pipeline of housing supply – and ongoing attention is vital to achieving greater housing diversity and to facilitate the supply of affordable housing.
- The Western Parkland City has been a welcome focus of inter-governmental collaboration including via the City Deal. It is important Parramatta / Central City remains a priority – and the GCC build on the great work on the Place Infrastructure Compact (PIC) for Greater Parramatta Olympic Park.
- Employment lands policy has been well researched and applied – ensuring sufficient lands in the centre and east cities.
- The focus on green spaces, accessibility and active transport across land use and transport strategy has improved liveability – although supporting initiatives on infrastructure funding and infrastructure contributions remain works in progress.
- Collaboration on outcomes across a range of centres.

The areas for future attention include the loss of vegetation and canopy cover, poor house design outcomes on small lots (and with respect to urban heat) and an ongoing mismatch in the provision of more diverse housing and affordable housing at scale.

The next generation of strategic plans will be prepared in a more uncertain strategic planning environment. Community values have shifted - bushfires, Covid disruption, remote working, regional housing demands and stronger carbon goals demand a reset. PIA expects the next generation of Regional Plans to respond to embed resilience - while a deeper connection to country should permeate all plans – as emphasised in the Discussion Paper.

The Planning Institute of Australia (PIA) understand that the next generation of regional plans are critical to manage uncertainty and embed resilience in how settlement is planned. PIA expects the plans embrace the following issues in ways that are effective for the Six Cities and other regions.

#### **EXPECTATIONS FOR NEXT GENERATION OF REGIONAL PLANS / SIX CITIES PLAN**

##### **Regional Plans should have clear place outcomes, and:**

- *Adopt a shared vision on the nature and distribution of the State's growth.*
- *Adopt place outcomes specific to the region based on evidence and stakeholder support (eg level of service goals, accessibility goals for centres or inter-region connectivity times, urban heat, access to public spaces)*
- *Articulate how the region would meet state settlement goals and industry productivity outcomes.*
- *Respond to distinct district characteristics.*

##### **The next generation of plans should apply consistent growth parameters and:**

- *Adopt common population planning periods - so population change scenarios can add up across all regions.*
- *Consider population, housing and employment planning parameters or targets collectively and appreciate their statewide interactions.*
- *Apply common demand parameters for infrastructure (eg per capita demand for: water, power, data, energy (adjusted for climate) - and how these relate to different growth scenarios.*
- *Consider the employment demands of future industry alongside projections of existing industry sectors.*
- *Link to State and National Settlement Strategies.*

##### **Embed resilience in Regional Plans:**

- *Responding to scenarios - considering 'when' as well as 'what' decisions should be made.*
- *Finding flexible pathways towards an outcome.*
- *Allocating decision-making responsibility to the least centralized capable level.*
- *Planning settlement at a landscape scale for exposure to bushfire and flood threats – and planning for human life and safety not just property protection.*
- *Setting standards for environmental and biodiversity performance.*
- *'Building back more resilient' – with innovation to enable planned retreat where threats cannot be mitigated.*
- *Enabling communities to lead adaption and management – not 'plan and forget' - with a stronger expression of indigenous knowledge.*

##### **Regional Plans and supporting strategies should set pathways to net zero carbon, and:**

- *Identify existing carbon /GHG (tonnage) contributions by region and sector – and attribute a target to the built environment. This is an ambitious ask.*
- *Identify new precincts to become carbon neutral as a first step.*
- *Regional plans / EIA regimes should identify land and assets to support renewable energy and enable offsets.*
- *Plan and design for accessibility, transport choice, energy efficiency, the circular economy, vegetation cover and biodiversity conservation - as part of a network of green and blue infrastructure.*

##### **The next generation of Regional Plans should strengthen regional connectivity, and:**

- *Set out the housing and economic role of key centres in a regional structure plan which establishes demand for potential transport connections – and identifies corridors for protection.*

- Consider growth scenarios that respond to different levels of local and inter-regional connectivity – and which are sensitive to recent remote working / living trends.
- Decide connectivity goals / timing – adopted in integrated state / regional transport and infrastructure plans.
- Prioritise and sequence future transport infrastructure recognizing state priorities rather than having an unrealistic expectation of all being needed at once.
- Emphasise the need for inter-region cycle networks between all of the Six City Regions
- Focus on internal travel and local destinations with an emphasis on improving local transport choice and improved access to services (a ‘movement and place’ focus).
- Outline ‘bundles’ of place-based infrastructure programs to achieve a place outcome.

**Focus on implementation and governance:**

- The next generation of plans should be fully integrated with state infrastructure planning.
- Growth infrastructure plans would show how their benefits can be optimized over time to achieve value compared to projects around the state.
- Bundles of smaller place-based projects could become just as significant as ‘megaprojects’ for achieving place outcomes and have their own competitive funding and procurement pathways.
- Regional plans could be supported by delivery entities accountable for achieving the place outcomes.
- These entities may be responsible the implementation of city deals, Place Infrastructure Compacts – as well as use of Regional Infrastructure Contributions. are showing the way. They would need the ability to influence alignment of agency priorities and shepherd projects through the budget process. Potentially, they would have access to a funding stream and a regional budget.

## First Nation Voice

The wide range of frameworks outlined to progress this ‘region shaper’ are supported assuming full involvement and leadership by First Nations people – noting the proposed advisory panel. PIA place a particular emphasis on ensuring the planning system is designed to enable the achievement of First Nations aspirations.

PIA continues to support First Nations people strengthening their capacity to gain value from their economic base in land. The Region Plan should consider the ways First Nations people act as both owners and stewards of Country and reflect on how care and stewardship is addressed in the planning system.

## From Three to Six Cities - and a Connected Six Cities Region

PIA is sympathetic to the Six Cities Region being a focus for the Regional Plan. However, it is not yet a coherent megaregion in which the different elements contribute to create even greater value together. PIA continues to support attention to the development of Parramatta / Central City and its connectivity with the Southern Sydney Region.

PIA suggest that the six cities are not the same – and may be better conceived as three ‘interconnected’ cities (Western, Central and Eastern (Sydney Cities) and the three ‘connected’ cities (Wollongong/Illawarra, Central Coast and Newcastle/Lower Hunter).

A clear vision for the distinct roles of each of the six cities - and a greater awareness of the deep interventions and investment over different time scales will be needed to deflect the trajectories of the three ‘connected’ cities beyond Sydney.

Scenario planning may reveal what timing and pathway offer the best prospects for each city to fulfil its potential and complement the whole. Availability and access to suitable and affordable housing and access to different labour markets could emerge as a key driver for achieving plan outcomes.

It may well emerge that earlier attention to a dynamic and well-connected Newcastle/Lower Hunter would offer flow on advantages for the Central Coast. Under any scenario, faster rail connections to Newcastle and better orbital connectivity around the middle ring of Sydney – and between Southern Sydney / Illawarra and Western Parkland City would likely be an advantage.

PIA has consistently supported faster rail connections among the Six Cities, highlighting the critical need for a rapid and frequent connection between Sydney Cities and Newcastle. Faster rail does not exist in isolation and an integrated public and active transport strategy should be developed alongside.

There may be an opportunity for transformative change of Newcastle – its industry, urban structure and more diverse urban forms. A city deal opportunity may emerge to transform local accessibility and establish stronger transit-oriented development nodes.

The Six Cities focus should not deflect attention from improving the accessibility and liveability of the Central River and Western Parkland Cities – and it should maintain its focus on centres activation and housing diversity in the Eastern Harbour City.

The incorporation of the Southern Sydney District into Central / Eastern City Plans should not deflect attention from the economic and labour market advantages of Southern Sydney (eg. airports, hospitals, employment hubs).

### **Housing Supply, Diversity and Affordability**

The Regional Plan can establish pathways for an orderly long-term pipeline of housing supply in each submarket that is well integrated with infrastructure. The proposed targets should be based on the capacity to deliver the amount and diversity of housing (integrated with services and infrastructure) that would fulfil the objectives for each city - at different stages into the future.

The potential for contingent targets should be explored. These could identify pivotal assumptions and commitments which if met/not met would trigger a different set out of outcomes and targets. Contingent targets would help hold agencies to account and allow the planning system to flex when unforeseen events or altered key planning assumptions now applied. While still valuing certainty for developers, contingent time related targets would create incentives for agencies to meet planned major commitments and transparently flag ahead of time to communities and developers the pace of change and growth would be varied and more appropriate, if infrastructure delivery fell very significantly behind the stated planning commitments (Pers Comm SSROC 2022).

The Region Plan should investigate alternative scenarios for each city and identify the nature and timing of key decision points on which development fronts or renewal precincts to turn on.

There is evidence that the volume of housing supply in the private market is not a strong influence on purchase price – nor access to affordable rental. PIA continue to call for investment in social and affordable housing at scale – along with a range of measures that facilitate the delivery of affordable housing. In particular, broader uptake of mandatory inclusionary zoning schemes for affordable housing available in perpetuity – and greater use of public land assets for affordable housing.

PIA supports the Discussion Paper focus dwelling intensification surrounding existing and future transport hubs and the development of housing targets in each LGA. The location and intended density of housing delivery—through local infill, brownfield and greenfield developments need to be aligned between LSPS, Housing Strategies, District/City and Region Plans – and coordinated with other policies and investments across government.

Intensification of housing around accessible and high amenity centres should be planned strategically alongside other uses to maximise the value of the initiative. Any upzoning should not be arbitrary, but reflect the characteristics of the centre, its walkable catchment, character and its economic role.

Further, the Region Plan should recognise the role of the community in the identification and development of appropriate housing. Educating and engaging with the broader community would not only improve the understanding of the current context and any potential future changes but would also contribute to place-based outcomes. The future Regional Plans should provide clear directions on the location and type of intensity of housing with relevant benchmarks in place for housing and infrastructure delivery in growth areas.

With the pressure on housing delivery and expedited approval pathways, it is necessary to ensure that the quality of housing is not compromised. The Discussion Paper outlines a vision for local liveability; however, it should also focus on achieving design quality and excellence. Good design is intrinsic to ensuring higher density developments retain liveability. Good housing design goes well beyond contributing to the city’s aesthetics— it contributes to the city’s social, economic and environmental value and helps create resilient neighbourhoods and communities. The Region Plan (and the subsequent City and Regional Plans) should emphasise the importance of good housing and urban design in the provision of increased housing diversity and supply and provide strategic guidance on the urban form of housing. This includes setting the objectives for design excellence, urban design updates to design guidelines, energy efficiency standards and transport access.

The Discussion Paper addresses the need for diversity of houses and advocates for the supply of medium density housing that is connected to high-quality amenity, essential services and transport infrastructure. It is important to note, however, that the current complying development code for medium density housing makes provisions for a narrow range of housing typologies, that take a “one size fits all” approach, and do not adequately respond to local conditions. While the code would be instrumental in delivering the projected housing targets envisioned for the Six Cities, the substantial risk of built form outcomes that respond poorly to the local context would result in community backlash and distrust. Ultimately having well-integrated, high-quality and community-supported housing delivery is more important than just churning houses out. The Region Plan should facilitate the development of a range of dwelling typologies and outline principles for new housing development to take into account the unique characteristics of a location and its community and encourage excellence in the design.

The future Regional Plans include objectives that focus on the quality of housing outcomes and outline actions to reform existing design guidelines that reflects need across all NSW.

## **Inclusive Places Linked to Infrastructure**

The next generation of plans should be fully integrated with state infrastructure planning. Growth infrastructure plans would show how their benefits can be optimized over time to achieve value compared to projects around the state. Bundles of smaller place-based projects (eg green infrastructure) could become just as significant as ‘megaprojects’ for achieving place outcomes and should have their own competitive funding and procurement pathways.

Regional plans could be supported by delivery entities accountable for achieving the place outcomes of the plan. They may be responsible the implementation of City Deals, Place Infrastructure Compacts (PICs) – as well as any Regional Infrastructure Contributions - are showing the way. They would need the ability to influence alignment of agency priorities and shepherd projects through the budget process. Potentially, they would have access to a funding stream and a regional budget.

Covid and the growth of remote working are further challenging population and employment growth and containment assumptions. The need for stronger regional connectivity is increasing alongside the need for better local accessibility and more housing choices. Regional strategies should set out the roles of key centres, demand for connectivity under different scenarios and identify corridors for protection. Active transport networks at a local scale and ‘last mile’ facilities would complement major transport initiatives. Regional plans could anticipate ‘bundled’ programs of many local infrastructure items that collectively support a place outcome.

Integrated transport strategies should use scenarios to explore how a vision for improved connectivity could be achieved for separate places and at different times.

The discussion paper addresses active transport and promotes mode share targets in its role in addressing a connected region. PIA strongly encourage the GCC to consider how the regions can be connected by active transport links through cycleways that go beyond urban centres, and how networks can be developed within strategic centres and hubs. Cycle and walking networks that are safe, convenient and accessible are crucial to a successful and sustainable city.

## **Powering Local Jobs and Economies**

The Six Cities focus should assist in strengthening the complementary but different economic roles and characteristics of each city. Not every centre can or should be an ‘innovation hub’ – and in any case innovation permeates every enterprise. There is a clear role for collaborative partnerships to identify and develop different city strengths.

The Region Plan could investigate scenarios for the land requirements, skills, logistics and trunk infrastructure needed to support emerging industries and specialisations in each city. The Plan should enable economic development initiatives for regions in transition from coal mining or other carbon intensive industries. In general, planning should continue its role in creating accessible and well-designed spaces that enable transport choice, reduce energy consumption and promote the circular economy.

PIA Young Planners submission emphasizes planning for the creative and night-time economy and building on agglomerations, local strengths and labour force characteristics.

Job targets should work alongside housing targets to ensure a balanced approach to ensuring land and infrastructure capacity is available that supports industry and skills development. The industrial and commercial land studies and evidence that have ensured industrial land supply in Sydney should be extended to the Central Coast, Illawarra and Hunter.

An integrated ports/airports/freight strategy that builds on the advantages of each port or hub and optimizes overall freight network performance will be essential for the six cities to complement each other's performance.

Universal access to high speed and reliable digital connectivity is a prerequisite for the success of all six cities.

### **Climate-resilient Green Cities**

PIA's [submission](#) to the NSW Independent Flood Inquiry and also our [submission](#) to the NSW Bushfire Inquiry are relevant to the Region Plan regarding prioritizing areas for growth and even planned retreat - taking a more climate responsive approach to planning measures for development in sensitive areas. PIA strongly supported implementing the Department's strategic planning guide for natural hazards in our [submission](#) - including the elevation of planning and design for urban heat.

Embedding resilience also recognizes expectations for improved standards of environmental performance – so that responding to climate change or other shocks does not reduce biodiversity, heritage or other qualities of the natural or cultural environment.

Settlement should be planned that is not exposed to increasing threats that are unable to be mitigated in a heating climate. 'Build back better' should be reinterpreted as 'build back resilient – or not at all'. This requires consistent climate change parameters to plan within acceptable goals for multiple overlapping conditions - urban heat, bushfire, severe weather, flood and sea level rise / inundation - and biodiversity conservation. The plans should say where settlement is not appropriate from the perspective of human safety – and account for planned retreat.

The plan should set Regional/City targets for environmental performance. Regional plans should soon be able to budget the amount carbon and timeframe for achieving zero net carbon in the built environment. While state / national frameworks are being developed, the identification of low / net zero carbon precincts and buildings serve as a proxy for a definitive and proportionate contribution. The contribution of these precincts should be defined and measurable.

The broad objective is for the planning profession to be proactive in developing strategies to avoid harm – by reducing the overall demand for non-renewable sources of energy, reducing greenhouse gas emissions, supporting the shift towards renewable energy, promoting land management and vegetation cover and enabling offsets.

### **Conclusion**

PIA appreciate the opportunity to comment and build on the Discussion Paper. Our members look forward to being involved in the development of the Six Cities Region Plan. Please contact PIA NSW Executive Officer Karen Goldsmith ([karen.goldsmith@planning.org.au](mailto:karen.goldsmith@planning.org.au)) if we can make a further contribution.

Yours sincerely

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