Dear Lucy,

PIA Submission on Draft District Plans and Metropolitan Strategy Amendment

The Planning Institute of Australia NSW (PIA) appreciates the opportunity to provide input on the six draft District Plans and the draft amendment to the metropolitan strategy (Towards our Greater Sydney 2056). PIA strongly supports the role of the Greater Sydney Commission and the evolving positive impact of the District Plans and Metropolitan Strategy amendment.

PIA commend the GSC for important initiatives including: a 5-10% target for affordable housing provision, the vision for growth of Central and Western Cities, the green web and aspirations for a net zero carbon city.

The draft District Plans provide valuable guidance, however PIA’s view is that the final District Plans should be less generic, have comprehensively more strategic planning policy direction, tangible actions, priorities and explicit accountabilities for implementation. The Draft Plans must provide a spatial planning framework that builds community and industry confidence that growth can be accommodated with improved living and working conditions. The biodiversity, scenic and agricultural values of the Metropolitan Rural Areas also need to be retained.

As the extent of documentation was significant, and is likely to be reduced in volume, our attached submission is structured as follows:

A. Input on ‘Towards our Greater Sydney 2056’ (Draft Metropolitan Strategy amendment)
B. Issues common to all Draft District Plans – including governance and implementation
C. Input specific to each of the six Draft District Plans

Please contact myself or our Principal Policy Officer (John Brockhoff 0400 953 025) on our submission. Our members look forward to contributing to the finalisation of the District Plans.

Yours sincerely,

David Broyd
Vice President, PIA NSW

cc. Anthony Roberts MP, Minister for Planning
Carolyn McNally, Secretary, Department of Planning and Environment
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KEY ELEMENTS OF PIA SUBMISSION

DRAFT ‘TOWARDS OUR GREATER SYDNEY 2056’

• The strategic vision must be owned by the whole of NSW Government for collaborative implementation as the guiding policy for future settlement and employment distribution. It should lead the agenda for other transport, health and infrastructure plans. As an incentive agencies should be accountable to report on progress towards achievement of District Plan outcomes.

• PIA will continue to advocate for an integrated infrastructure planning and funding regime that addresses growth needs, captures value in a fair and predictable manner and achieves quality places to live and work. Metropolitan and district strategic plans cannot be successful without a comprehensive funding system (which is yet to emerge) – which balances contributions between those who benefit and the broader taxpayer in a predictable manner.

• PIA supports an equitable polycentric city with networked centres – improving accessibility for a ‘30-minute city’. This requires better connections among centres – especially orbital transit links across the arms of Sydney’s major corridors (eg Parramatta to Macquarie Park), as well as high capacity rapid transit links between the three cities.

• PIA supports the 3-city plan to attract attention, activity, investment and jobs in Central and Western Sydney associated with: Western Sydney Airport – along with early rail access via SWRL and future certainty regarding the Outer Sydney Orbital. The growth and connectivity of Parramatta with the other cities, key corridors and employment precincts remains a priority.

• The 3 city plan should ensure that focus is also placed on the vision for the eastern city with key freight, rail, and infrastructure requirements, and the impact of spatial growth and productivity for the region.

• The 3 city plan should not ignore improved links with cities of the Hunter, Illawarra and Southern Highlands / ACT.

• The classification of strategic centres should reflect and recognize the potential and pivotal future role of Bankstown, Liverpool, Penrith and Campbelltown-Macarthur as hubs in an intensifying south and west of the city. Economic development initiatives should be supportive. Sole reliance on the aerotropolis is a risky strategy.

• The delivery of adequate infrastructure to maintain liveability is fundamental to the social contract between government and communities to accept urban growth and intensification. To this end all District Plans need to be specific on what infrastructure needs are being planned for and how they will met and funded on a precinct by precinct basis.

• The strong governance role and mandate of the GSC is pivotal to the quality of City that will be the future Sydney. The GSC should be charged with facilitating and directing programs and budgetary allocations of other State agencies to align infrastructure and services implementation with the rate, locations and scale of planned development patterns;

• 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 Metro and District Plans. This can ensure the Plans are achieved
• District Plans should detail the development pattern, infrastructure provision and upgrading needs that align with the Greater Sydney Metro Plan and provide direct, tangible connection along the “line of sight” to direct the content of Local Strategic Planning Statements which have to be mandated to be fully consistent with the District Plans.

• The NSW Government is urged to strengthen the infrastructure integration role of the Infrastructure Delivery Committee of GSC and the impact of the GSC on infrastructure prioritisation in the NSW Infrastructure Plan and State Budget.

• The GSC should shape an innovative city deal (funding and delivery) for Western Sydney Airport (WSA) its connections and an aerotropolis – with national, state and local partners.

**DRAFT DISTRICT PLANS**

• District Plans should be more explicit on the spatial development pattern, infrastructure provision and upgrading needs that align with the Greater Sydney Metro Plan and provide direct, tangible connection along the “line of sight” to direct Local Strategic Planning Statements.

• PIA strongly supports setting affordable housing targets on both government land development and for private development projects via the District Plans at least at the proposed 5-10% target. This should be supported by planning policies such as a model code for inclusionary zoning and guidance for the use of relevant VPAs to facilitate affordable housing in communities. PIA has advocated further affordable housing targets and a raft of housing affordability measures and would be pleased to work with GSC.

• The 20-year horizon for District/LGA housing supply targets are supported and should be refined based on growth demands and infrastructure ‘carrying capacity’ rather than an extrapolation of short term rates of supply. The targets should be minimum targets and can be adjusted to provide housing diversity to a growing population, but should also be responsive to future living conditions and reflect the availability of economic and social infrastructure to maintain amenity.

• The final District Plans should set out comprehensive infrastructure funding and delivery plans for identified growth or renewal areas. The plans should be underpinned by a funding mix, with the respective shares to be provided by contributions, value sharing/betterment, special rates, grants, other taxes and charges. A comprehensive approach would see State and local infrastructure contributions and infrastructure schedules in the one plan for a growth area. PIA would not exclude the opportunity for a broad based regional property levy.

• PIA supports the GSC in a precautionary approach towards the residential conversion of commercial core and industrial (now employment and urban services) land. This should promote urban services uses and different enterprise and job opportunities into the future. Where possible a spatial planning approach is preferred. However, the use of prudent ‘community benefit’ criteria can also provide guidance and certainty to all stakeholders.

• PIA supports the District Plans environmental narrative concerning the value of a ‘green web’ as a network of vegetated open space corridors across Sydney as well as the enhancement of a ‘blue web’ recognising the landscape and biodiversity values of a healthy South Creek waterway and catchment. Further clarity on the objective of each should provide guidance to Councils and landowners on how the webs are to be funded and delivered.

• PIA supports the nominated collaboration areas and the extension of the goal to achieve a zero net carbon city.
• The final District Plans must be less generic, have comprehensively more tangible actions, connections to Local Strategic Planning Statements and explicit accountabilities for implementation. The Plans must provide a clearer spatial planning framework that builds community and industry confidence that growth will go hand in hand with improved living and working conditions.

• Regarding Metropolitan Rural Areas, the District Plans need to resolve tension between encouraging identification of future urban investigation areas, providing clear direction on priority areas for biodiversity conservation and balancing conserving and enhancing rural industry and opportunities.
A PIA SUBMISSION: ‘TOWARDS OUR GREATER SYDNEY 2056’

A.1 OVERVIEW

PIA endorses the approach of amending the Plan for Growing Sydney - metropolitan strategy to account for the emerging strategic directions of the District Plans. It is essential that the draft strategic vision for Greater Sydney is owned by the whole of NSW Government for collaborative implementation as the guiding policy for future settlement and employment distribution. The amended strategy must be the basis for allied infrastructure strategies (eg Long Term Transport Master Plan) and they must share the same goals and spatial agenda. The Greater Sydney Commission must be empowered to deliver integrated infrastructure planning, funding and delivery across government.

However, an expectation that the District Plans would include the mechanisms for funding identified growth infrastructure has not yet been met. PIA will continue to advocate for an integrated infrastructure planning and funding regime that addresses growth needs, captures value in a fair and predictable manner and achieves quality places to live and work.

The District Plans could also indicate the vision for the future of the city and outline which infrastructure has funding associated with it, or a funding framework that provides guidelines for other key infrastructure.

A District Plan should show the strategic vision, and clearly indicate which large infrastructure items shape the city and which are funded or not.

A.2 CONCEPT OF THREE CITIES

The underlying focus remains for an equitable polycentric city with networked centres – based on improving accessibility under a ‘30-minute city’ philosophy. This is strongly supported by PIA and it requires increased attention to transport links among the cities, strategic and district centres – especially orbital transit links cutting across the radial arms of Sydney’s major corridors.

The concept of the three cities which has been developed during the formation of the District Plans is clearly an important initiative recognising the growth needs of Greater Sydney as a whole, with specific recognition of the fact that the new western city has added an important dimension based around the new airport. PIA supports this approach as a way of proactively attracting activity, investment and jobs in Western Sydney. However, the risk of increasing socio-economic imbalance is significant.

Previously, the discussion was around a city with an eastern CBD and a ‘western’ CBD – with the emerging prominence of Parramatta as the ‘western’ growth CBD. The question arises as to whether the District Plan approach which has generated the three-city concept is the best and most realistic model for the future - or whether a new three city model requires development based on the needs of an existing established city (Global Sydney), a city which is currently in a strong growth phase (Parramatta) and a city which is still largely conceptual but in a prime position for some clever strategic planning (Airport and West).

The vision is bold and intentionally seeks to shift the centre of gravity further west to improve access to the emerging global economy to a wider range of Sydney’s residents. The vision carries risks concerning the unconfirmed pathway for the development and growth of a Western Sydney Airport and how western Sydney centres would be linked with the economy.
of the aerotropolis and be better connected with Sydney’s central and eastern cities. The Commonwealth Government’s preparation of a Greater Western Sydney City Deal and potential funding for enabling infrastructure to connect the aerotropolis to centres within its district and the central and eastern cities will be significant. In any case, the GSC should build on the NSW Government’s commitment to strengthening the ‘Regional Cities’ of Penrith, Liverpool and Campbelltown-Macarthur. Given the vast geography of Western Sydney these cities must be better linked with a new Western CBD and airport to support growth and provide a diversity of living and working environments across the west of Sydney.

Further if the Greater Western City and the aerotropolis is going to be successful, then the residents from the east and central Sydney areas need to be connected by a fast and efficient transport line linking the two airports. If the three cities are not linked Greater Sydney will not be more productive or efficient as an international city.

The concept of 3 Cities should not be limited to within the Greater Sydney area as rapid connections with a vibrant jobs rich cities in the Hunter, Illawarra and Southern Highlands are also a State Priority. PIA support the concept of planning within the economic geographic framework of the former Greater Metropolitan Region (plus ACT).

What should emerge from this evolving focus is a Strategic Infrastructure Plan – integrated with the planning and phasing of the development pattern - which envisages the size and shape of the new city, predicts its transport, utility, open space, and general infrastructure needs and puts certain principles in place at this early stage. The aim would be to avoid the necessary but late provision of infrastructure to maintain the operations of an existing city as is currently happening to the eastern city, where bridges, tunnels and connections are being developed at enormous expense and disruption to manage the forces of growth.

**A.3 CENTRES AND RENEWAL CORRIDORS**

Important centres across Greater Sydney have been reclassified as Strategic or District Centres based on the amount of jobs currently serving the broader Sydney and Global economy (Strategic) versus jobs predominantly serving the District economy. This characterisation is not based as clearly on the potential or desired future role of these centres. Each centre has an employment growth target and there is a range of economic development and planning initiatives to support it. The assumption is that the State Government will take an active stake in the success of Strategic Centres and not the others.

However, there are problems due to the perceived de-valuing of the roles of Penrith, Liverpool and Campbelltown-Macarthur (no longer Regional Cities) and Bankstown (no longer a Strategic Centre). Each of these places is pivotal for the future of their District. In Penrith’s case there is a substantial risk for the west if the aerotropolis does not take shape rapidly. Bankstown is a key hub for the middle ring and an important node for any future orbital (north-south) transit corridor connecting Parramatta and Southern Sydney and reconsideration should be given to its designation as a Strategic Centre. The Campbelltown and Greater Macarthur district needs a whole of government focus to ensure the centres and associated employment strategies are developed and implemented, or otherwise the centres may struggle for years.

PIA supports the identified corridors below as important strategic places for which integrated state government action must deliver a quality growth outcome in line with the three cities approach:
Greater Parramatta to Olympic Park (GPOP) – should be supported for employment, education and housing growth in a superior urban environment. GPOP should be better linked by transit towards much of its labour market in southern and western Sydney – as well as with the existing global economy in Macquarie Park and Eastern Sydney. PIA remains concerned that the light rail proposals have been delayed and without a clear picture of the role of a West Metro.

Bays Precinct – should be progressed as an opportunity to expand the capacity of Sydney’s CBD for employment as a desirable and well connected business address. Housing growth is important but should not stifle commercial growth.

Central to Eveleigh – an important highly accessible mixed use growth opportunity that could demonstrate a zero net carbon future and incorporate a substantial affordable housing component

Sydenham to Bankstown – a major accessible growth corridor with opportunities for high and medium housing where there is both good walking and transit access and where there is superior planning and investment to meet benchmarks for social infrastructure

North West Rail Line Corridor – urban design of new town centres and the delivery of community infrastructure are important to invigorate this corridor. The corridor is poorly linked to the Central City (Parramatta) and transit connections between Parramatta and both Macquarie Park and Castle Hill are important. The outer corridor also is poorly linked to West City and there is the opportunity to plan links via Marsden Park to Penrith, WSA and Leppington (or the South West Rail Link).

Anzac Parade – this corridor offers high amenity, is close to Sydney and has capacity for urban intensification with a stronger spine and cross city transit interconnections to the inner west. The Light Rail to Randwick does not address the transport needs of the majority of the corridor south of Kensington and there is an opportunity for the extension of the West Metro. Open space enhancements, coastal trails and the expansion of social and affordable housing programs are important in this corridor.

A.4 ECONOMIC GROWTH FOCUS

For the first time a planning strategy includes an explicit aim to increase Sydney’s economic growth rate – targeting an increase of total economic activity by 75% (to ~$655Bn) by 2036. PIA supports the strong productivity improvement agenda that runs through the plans including the explicit recognition of the need to retain important industrial / employment lands for urban services essential for the city’s economy – in the face of housing market strength.

PIA regards planning as an economic tool enabling the economy to operate more productively and to enable effective and efficient responses to growth challenges and risks faced in the regions. The distribution of jobs and housing in a hierarchy of centres within a cross linked transport network is important to achieve agglomeration economies and reduce living costs.

A.5 INFRASTRUCTURE AND FUNDING

PIA aspires to an infrastructure funding and delivery system based on the principles of strategic planning, fair cost, nexus and the fair sharing of cost between users. Forming a comprehensive district or precinct infrastructure plan setting out what infrastructure is needed is key step. This enables consideration of what infrastructure is a priority and why
and who should pay. It offers the context for how much developers should contribute within a mix of funding sources and mechanisms.

The plan needs to introduce a transparent process involving community, government and property stakeholders to arrive at a basis for apportioning the funding burden. The current system of funding growth infrastructure is broken with caps on rates and s94 contributions obscuring price signals in the market while distorting the use of a narrow range of other available funding mechanisms.

An infrastructure funding regime must balance contributions between those who directly benefit from infrastructure and broader taxpayers. Users and other beneficiaries will need to take a greater share of the funding burden, releasing taxpayer dollars to meet the wider needs of a growing and ageing population. In this search for infrastructure dollars, charges on development especially where additional value is created (and captured) is key part of a broader ‘beneficiary pays’ framework.

Value capture is the act of collecting a portion of the benefits from public infrastructure investments that flow to the value of land. Value that is captured or shared by governments should be used to pay for a portion of the corresponding infrastructure investment.

There should be comprehensive infrastructure funding and delivery plans for identified growth or renewal areas. The plan should be underpinned by a funding mix, with the respective roles/shares to be provided by contributions, value sharing/betterment, special rates, grants, other taxes and charges. A comprehensive approach would see State and local infrastructure contributions and infrastructure schedules in the one plan for a growth area. PIA would not exclude the opportunity for a broad based regional property levy.

Contributions obligations need to be made known as a package at the very time growth area structure plans are released for comment. Local, state infrastructure and also any affordable housing contribution imposts need to be known up front to be effective. At least indicative levels of State and local contributions and any value sharing arrangements must be made public at the same time as structure plans for a growth area are publicly released. The charges should be predictable for land purchasers so that the full fair share of any value uplift created by subsequent rezonings is returned to the new community through infrastructure upgrades.

A.6 METROPOLITAN GOVERNANCE AND ROLE OF GSC

The role of the Greater Sydney Commission (GSC) responsible for the delivery and monitoring of the District Plans is pivotal to the liveability and economic well-being of future Sydney. It is highly visible and has a degree of independence within government. Although the GSC shares accountability with the Department of Planning and Environment and all NSW Agencies, it is well placed to drive innovation and lift the status of strategic planning for Sydney to the extent that major planning and investment decisions are better integrated around a shared vision. However, PIA recommends that the role of GSC in infrastructure planning and prioritisation be substantially strengthened.

Expectations of the GSC were that integration of planning development patterns with infrastructure planning and funding would be strengthened and that the GSC would have a level of mandate to ensure that State Government infrastructure providing agencies coordinated programs and budgeting with the Sydney Metro and District Plans. However, there is a major gap in that the GSC does not have that mandate or authority to determine
infrastructure priorities for funding, sequencing and integration with development patterns
and capacity upgrade needs. The ex-officio, senior involvement of Treasury, NSW
Infrastructure, Transport and Urban Growth within the GSC structure is helpful but there is no
mandate or authority to direct implementation. Similarly, the Departments of Education and
Health are “at the table” but this seemingly is having, and will have limited effects on the
priorities for provision of services by those departments.

The Metro Plan and its implementation should embody that integrated development and
infrastructure planning to direct and facilitate:

- Investment in strategic infrastructure of metropolitan significance
- Designation of major activity centres and facilitating development in these centres
- Designation and management of major transportation corridors
- Identification and development of key employment nodes
- Formulation of land release schedules in growth areas
- Protection of environmental assets of regional significance
- Maintenance of efficient land supply for housing

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. The role and interface with the Department of Planning and Environment needs
to be clarified in this regard.

There is an opportunity for the GSC to define the outcomes sought for a Western Sydney
City Deal with the Commonwealth and local Government - and participate in designing
integrated governance regimes – potentially including an innovative funding, finance and
delivery vehicle for the Western City.

PIA also supports the GSC maintaining a digital dashboard of outcome indicators and
monitoring implementation of the plans and city performance with respect to productivity,
liveability and aspects of environmental sustainability. There is also the potential for the GSC
to measure and encourage the delivery and achievement of the nominated affordable
housing targets.

The review of the metropolitan strategy and long term transport masterplan provide an
opportunity to strengthen the infrastructure integration role of the Infrastructure Delivery
Committee of GSC and the impact of the GSC on infrastructure prioritisation in the NSW
Infrastructure Plan.

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.
B. PIA SUBMISSION: COMMON ISSUES FOR ALL DISTRICT PLANS

B.1 HOUSING

Housing supply and targets

Councils and communities need to have certainty and direction regarding the degree of growth expected within the lifetime of the District Plans. For this reason, the inclusion of council-based housing targets and centre specific jobs targets within the draft District Plan is supported as the most transparent way to express the scale of growth that needs to be planned for. Planning for a 20-year housing target is supported with a recommendation to improve the transparency of the target calculation methodology.

The 20-year housing targets should be calculated on growth demands and infrastructure ‘carrying capacity’ rather than an extrapolation of short term rates of supply. This would ensure that pro-active councils are not allocated inappropriate targets if the pace cannot or should not be sustained. The ‘carrying capacity’ of individual local government areas to accommodate growth should be determined with reference to the anticipated needs, liveability benchmarks and the potential for the provision of infrastructure using publicly available resources and methodology. It can also be considered based on the current size of lots in suburbs and where land has the capability to absorb housing infill with housing diversity. Without transparency target calculations, commitments to infrastructure and council-led local planning community confidence in planning for growth will be undermined.

Housing diversity, adaptability and affordability

Affordability is impacted by a wide range of complex fiscal, financial, demand and supply factors that extend beyond planning systems and approval processes - including elements such as taxation, construction costs, and access to finance.

Improving housing affordability is an important goal of PIA. Having a bigger slice of our population with access to suitable housing near their jobs and communities is critical to our economy and wellbeing especially in our major cities.

PIA advocates a multi-pronged approach to the roles that GSC and planning generally can play in tackling housing affordability – the first three are supported by the District Plans:

- **Expanding housing supply** – via encouragement for councils to respond to District Plan targets taking into account local situations. The integrated planning and supply of infrastructure and further planning system reform to the complying development process (see missing middle below) and LEP template are important elements of improving the housing supply pipeline.

- **Deliver a wider range of housing types including more adaptable housing** - Improve the planning system and capacity of our city districts to accommodate a wider range of housing types. To do this PIA is supporting the removal of barriers for expansion of improved design for medium density housing types across much more of our major cities. PIA recommends that District Plans respond to the need for more adaptable housing meeting the needs of an aging population – targets could be considered.

- **Expand investment in affordable housing sector of the market** - PIA supports an expanded role for community housing providers in a much larger market sector (catering for very low to moderate income earners), to sustain stock and establish the
financial models necessary to channel investment into this investment class. To do this PIA are advocating further planning reform to promote affordable housing supply and also the expansion of government rental subsidy for lower income earners to incentivise investment in this sector. It could also be about considering engineering standards and levies to ensure more affordable housing options are included into a policy framework. PIA is keen to apply the lessons learnt in mature financial markets for affordable housing such as the UK to local situations.

- **Re-balance our financial and tax incentives** - to get more from our existing housing stock and generate new and appropriate housing where it is needed. PIA acknowledges that while planning initiatives have an important role for the supply of housing at the affordable end of the spectrum, demand side factors needs to be taken into account. For example, high stamp duty costs on the housing purchaser impacts turn over and means more people are living in housing that may no longer meets their needs.

- **Strata reform** – incentives for the renewal of housing stock.

PIA therefore supports the District Plans in improving access to affordable well-located housing that is integrated with transport, employment and services. Equally, housing should be of a suitable design and quality to meet the needs of a diverse population and to enable residents to live a sustainable, energy efficient lifestyle. These issues are expanded below.

**Medium density design guide and ‘missing middle’**

PIA’s submission on the medium density code recognised that it is appropriate to provide complying development pathways for well-designed forms of medium density housing in the right location and context, including for: dual occupancies, up to 4 terraces or town houses and manor houses focussed in areas of high amenity and accessibility. However, our support is based on measures proposed to improve public confidence in the certification system which will be explained in PIA’s imminent submission on the Environmental Planning and Assessment Bill reforms.

PIA support complying development pathways in any residential zone where the type of medium density housing covered by the code is permissible in that zone, the development is not over two storeys and other development standards/controls are clear in an adopted Development Control Plan.

Our position recognises that there should be an equivalent incentive for the delivery of forms of medium density housing in comparison to complying development provisions for detached housing. This could include fast track assessment, as demonstrated by the recent award Liverpool Council obtained for their e-portal and fast track DA system for dwellings. The proposed Medium Density Design Guide (MDDG) addresses many of the concerns raised by PIA towards a generic design approach.

Effective planning controls are judged on more than the speed with which they allow development to occur. There is a substantial risk of poor design outcomes and higher intensity development occurring in areas with low accessibility. This could result in community backlash and the opportunity to increase the diversity of housing types could be set back for many years. This was the case in the 1990s, following community concern over poor design outcomes from some dual occupancy subdivisions.

For this reason, PIA advocate that Local Housing Strategies (refer Action L1 in Draft District
Plans for Sydney) should set the context via a Master Plan for:

- where the proposed Medium Density complying code should apply based on the location of zones where different medium density uses are permissible – with reference to accessibility;
- where a ‘customised’ Medium Density complying code would apply which could set the circumstances in which the code applies (based on accessibility and locally consultative strategic planning); or
- where an alternative fast track DA process would apply.

This less generic approach would better manage the risk of denser and larger medium density development being located in less accessible areas; in which parking, design and amenity standards that would be poorly matched to the suburban context.

**Delivering affordable housing**

It is important to make the distinction between “affordable housing” to which planning can contribute from housing affordability as the wider issue which is far more influenced by Federal and State level fiscal factors, taxes, stamp duties etc.

PIA regard the delivery of affordable housing (ie. that market segment of housing affordable for very low to moderate income earners) as a key component of our housing stock and as essential infrastructure for a productive and fair Sydney. It is important that the role of planning to achieve housing affordability is clear.

PIA acknowledges that while planning initiatives have a role for the supply of housing at the affordable end of the spectrum, demand side factors including capital gains tax exemptions and negative gearing can have major effects of distortion on the cost of housing.

Good planning not only enables housing to be built, but generates spillover benefits reflected in the quality of a place and an increase in the value of land. Some of this increase can be shared among the owner and the community in ways that enable appropriate development to remain feasible while allowing for a contribution towards justified housing outcomes. Analysis of local housing demand and the state of the market is needed to identify the housing outcomes sought and set the contribution rates.

Having a diversity of housing supply available in accessible locations for very low through to moderate income earners is essential to drive the Sydney and NSW economy. As well as catering to vulnerable members of the community, affordable housing in close proximity to jobs and public transport provides greater job opportunities and offers industry better access to skilled human capital. Affordable housing initiatives as described in this sub-section are particularly important for the “middle-ring” of Sydney.

The lack of affordable housing also has a productivity dimension where a significant portion of a city’s labour market is isolated from the job rich core by transport constraints or a lack of affordable housing near job concentrations. PIA has identified three specific priorities and urges the State Government via the Greater Sydney Commission to:

- set affordable housing targets on government land development and for private development projects via the District Plans at between 10-20% of all new housing – and, if this is not accepted by the Government, then a minimum of 5% should be established;
• enable councils and the development industry to access planning policies that support affordable housing provision, including a model code for inclusionary zoning;
• identify urban renewal precincts as areas where voluntary planning agreements can deliver affordable housing, set aside land for affordable housing provision or offer cash in lieu - as the community’s share of value uplift.

PIA supports an expanded role for community housing providers in a much larger market, to sustain stock and establish the financial models necessary to channel investment into the sector.

**Affordable housing targets supported**

PIA has supported the adopted 10-20% target for affordable housing provision, but would accept a target of minimum 5-10%. It is also recommended that the interpretation of the target definition be tightened, its application expanded and the viability clause removed to maximise achievement of this modest target. PIA, having previously advocated for a 10-20% target would be pleased to work with the GSC and DPE to develop affordable housing policy further.

Evidence is required that demonstrates that the proposed 5-10% of uplift will meet the affordable housing needs in Sydney. In all other District Plan targets there has been an accompanying projection or forecast which is evidence based and produced by a body which is independent of the GSC. Information Sheet 4 highlights that “Greater Sydney requires at least 4,000 to 8,000 additional affordable dwellings per annum to meet the needs of low and very low income households”. This represents between 10% and 20% of the required 40,000 dwellings outlined in ‘A Plan for Greater Sydney’. The affordable housing target should be generated from the ground-up and the notional 5-10% target based on uplift seems mathematically improbable to be able to produce the required affordable rental dwellings.

There has also been a decline in the number of social housing units being supplied to the market. Housing completions have recently approached the high watermark of 30,000 annual completions, but social housing delivery has fallen dramatically from 1970 when around 1000 social housing dwellings were commenced annually, to now where less than 100 social housing dwellings are completed annually. While social housing is different than affordable housing, there is an overlap between the two product types and a shortage of both exacerbate the housing affordability issues in Sydney.

The District Plans reference to viability in calculating affordable housing provision leaves substantial room for exceptions to be granted. GSC should monitor the interpretation of the viability criteria to ensure that it is not ‘gamed’. If affordable housing targets are prepared with sufficient market evidence and stakeholder agreement and are clearly published in advance of speculation then there is the best opportunity for the target to be applied.

**B.2 ECONOMIC DEVELOPMENT**

**Greater Sydney’s economic geography**

On a range of social and economic indicators the picture emerges of a ‘divided’ Sydney. To the north and east around the water: a highly educated, high income population, and to the west and south west: a poorer and more disadvantaged population, with fewer life opportunities. As well as enhanced transport connections, parallel actions to strengthen the economic base of Greater Parramatta and Western Sydney Airport (WSA) are necessary.
These would include targeted investment in education and health, enhancing the public domain, skills and labour market development activities. PIA supports the District Plan’s focus on Greater Parramatta and WSA as the Central and Western Cities – while setting priorities for a more productive, competitive and innovative economy to:

- develop a denser network of highly connected employment centres in metropolitan Sydney to generate agglomeration benefits (from WSA in the west to Sydney City in the east), including invigorating the ‘Global Economic Corridor’
- develop the Western and Centre Cities to have a much stronger focus for advanced economy and knowledge sector jobs in the West and South West Districts of Sydney
- develop locally specific development growth strategies for the Western and Central Cities (Sydney City has sufficient competitive advantage) and specialised growth centres to build on their unique competitive strengths – including university education opportunities and leveraging major health investment
- ensure available zoned and serviced employment land supply is competitive and ahead of supply with a clearer timetable for infrastructure implementation – provide for local service industry needs but also plan for changing business needs – continuing to improve access and environmental outcomes
- enhance cross connections from the Western and Central within the metropolitan area to the core network of centres and to their surrounding hinterlands, to expand the pool of available employment opportunities for western Sydney residents and reduce the cost of business to business transactions.

Poor access to transport options is a major drag on the productivity of the economy as it reduces the capacity to match workers with jobs and limits the capacity of businesses to interact effectively and thereby benefit from agglomeration economies. There is a major equity issue at play. Limiting transport options ‘locks in’ some of the more disadvantaged parts of Sydney to automobile dependence (which is a high cost option for many households).

Sydney is already getting an economic, social and environmental return from the take-off of Parramatta as Sydney’s Central city. The next phase should see the strengthening of the private sector commercial office market, strategies to support complementary growth of the CBD, Westmead and Rydalmere, continuing urban regeneration to accommodate higher population growth, and better links to other strategic centres including Sydney Olympic Park, Norwest, Rhodes and Macquarie Park.

**Western Sydney Airport**

While it is likely the Western Sydney Airport (WSA) will attract a range of warehousing, freight and logistics activity, it will be more challenging to attract commercial office and retail uses in the short and medium term given the lack of critical mass. Without the natural advantage of a local executive labour market or access to a nearby city, the WSA will require considerable investment in social infrastructure and urban amenity to make it more attractive for aerotropolis uses. Government intervention, in the form of early public transport would be important to attract early jobs and create employment momentum. Similarly, providing large catalytic social infrastructure would provide an employment stimulus. Over the longer term, as the WSA grows and matures with established transport links, the employment lands near the airport may be a more favourable location for service / knowledge based industries in the form of campus style, business park buildings.
The Western City faces a risk to achieving critical mass if employment in the surrounds is fragmented. There are a number of existing and potential employment areas in the South West Priority Land Release Area (SWPLRA) and the Western Sydney Priority Growth Area including WSEA, the Sydney Science Park, Leppington and North Bringelly. These existing and potential employment areas could likely compete with each other and there is a risk that a fragmented approach will undermine the economic development and employment outcome for the Western City. There will need to be significant intergovernmental coordination that encourages clustering to achieve early critical mass.

The agglomeration economies associated with the critical mass of larger centres confer a range of economic benefits including ‘knowledge spillovers’ and access to ‘thick’ labour markets. Larger centres such as WSA (proposed Western city) and Parramatta are also more likely to gain ‘momentum’ – a circular and cumulative growth pattern, where new jobs feed off existing jobs, in turn stimulating additional jobs. This is particularly true for retail and services sectors being stimulated by the knowledge industry. The fragmentation of planned large employment precincts and centres into smaller centres can seriously diminish the positive economic effects of clustering. Therefore, any consideration of new employment centres or precincts – particularly new commercial office or strategic retail industries that would typically cluster at strategic centres – should be done so with caution to avoid undermining the positive externalities of strategic planned employment precincts and centres. Clustering of land uses will also help to underwrite the feasibility of future employment land development.

Support employment lands

PIA support the District Plans recognition of the value of industrial lands for urban services and employment as well as protection and enhancement of commercial cores in key employment centres clearly identified in the Plans. Where not clearly specified through evidence based structure planning, criteria should apply a precautionary approach to balance the long term needs for employment and urban services capacity against the general demand for housing. Current viability should not be an overriding consideration.

The GSC intention achieve a polycentric city and create a ‘30 minute’ city is supported. To achieve this, the conflict between employment uses and residential uses needs to be resolved. New residential infill development should be focused, where possible, on upzoning existing low density residential areas to avoid cannibalising valuable commercial and industrial land. There is a need to consider strategies to deliver job targets and manage the conflict between residential and employment development. PIA support the GSC position to support the retention and growth of key commercial and industrial lands in the face of residential development pressure. A range of sizes of lands for employment should be retained to ensure diversity in employment lands, especially well located to major roads.

There has been a push for high-rise residential development in major centres located on train stations in Sydney since the mid-1990s. The benefits have been seen as twofold – locating residents closer to jobs and fostering the night-time economy of centres. High levels of residential growth around the centres has occurred at Hornsby, St Leonards, Chatswood and North Sydney in the north, and Bondi Junction, Hurstville, Parramatta and the Sydney CBD.

Residential development has been ‘crowding out’ commercial office development across all centres in Sydney. The continued development of residential at the expense of further commercial development was seen as relatively benign until significant office stock, including
towers, started to be converted to residential uses. Concern with the level of residential
development in the traditional commercial core of key centres was identified by councils in
the early 2000s, with the view that such development was infringing on the opportunities for
commercial floor space expansion, and ultimately the role of the centres as employment
hubs. This trend has occurred within Sydney on the North Shore, Parramatta and the Sydney
CBD.

The B3 Commercial Core zone was specifically designed to protect areas within strategic
centres for employment uses taking a long-term perspective. The widespread application of
the B4 Mixed Use zone in key centres was, at the time, initiated with good intention – to
create a balance of residential and commercial development. Given the much higher returns
now achieved for residential development, this original purpose has not come to fruition. The
empirical evidence demonstrates that in most cases such an approach ‘prices out’
employment uses and thereby sterilises the potential for a greater employment role in future.

The conversion of commercial office for residential typically contradicts State Government
objectives to allow capacity for future employment growth in centres. Local governments
across Sydney – including Willoughby, North Sydney, Parramatta and City of Sydney –
Melbourne and internationally in London and Vancouver (where very high house prices prevail) have recognised this emerging problem and are seeking to address it before it
becomes a crisis. They have changed their planning policies to limit the encroachment of
residential development and encourage commercial office development in key centres. For
example, North Sydney Council (North Sydney) has implemented a non-residential FSR,
Willoughby Council is planning to implement differential height controls and contributions
rates, while the City of Stonnington (Melbourne) allow residential development only on the
3rd level or above. The GSC needs to provide support to local councils in their attempts at
protecting employment.

The Central District Plan discusses ‘protecting’ employment land and recognizes that the
rezoning from employment to residential uses “have the potential to have longer term growth
and productivity implications for Greater Sydney.” The priority in the Plan is to “take a
precautionary approach”, but places the onus on local Councils to ‘verify’ the use of a
precautionary approach, while the GSC retreats from the comprehensive and sensible
‘industrial lands checklist’ that has been a part of strategic planning orthodoxy since the
1990s. The GSC should not only reinstate the use of this checklist, but devise a similar
checklist to reduce the continued erosion of both commercial and industrial land across
Sydney. More than this, and in light of the potential elimination of several important suburban
office markets and across Sydney, the District Plans could contemplate identifying and
supporting existing B3 zones from conversion. It is imperative that GSC works with Councils
to identify areas that do not include residential dwellings currently so that they are to be
considered for B3 zoning in the future.

Securing the B3 zone and promoting office uses in the B4 zone reflects a long-term view that
grasps the cumulative effect of individual development decisions. A long-term view
necessitates a ‘structural’ lens not a ‘cyclical’ one. Cyclical factors or short-term residential
development imperatives should not be allowed to cloud ‘bigger picture’ planning visions. A
structural view promotes long-term public economic benefits against damage from short-term
private financial gains. Comparable arguments apply to the precautionary protection of
industrial zoned lands in the face of short term consideration of the non-viability of any other
use than residential. The cumulative loss of industrial and commercial floor-space will impact
on Sydney’s capacity to service its districts and provide opportunities for urban services that
enable economic growth to occur in centres and elsewhere.
B.3 INFRASTRUCTURE

Integrated Infrastructure Plans

PIA is seeking a much stronger integrated infrastructure planning oversight from GSC and the strengthening of the role of Infrastructure Delivery Committee to ensure that infrastructure agency priorities collectively meet the growth challenges identified in the District Plans. The systems and processes being developed do not yet have the trust of the planning and development industry.

It is not yet clear how the proposed ‘annual’ District Infrastructure Plan will become anything more than a District’s compilation of existing budget commitments – this should not be the case.

The delivery of adequate infrastructure to maintain liveability is fundamental to the social contract between government and communities to accept urban growth and intensification. To this end all District Plans include the following key direction: ‘Facilitate integrated infrastructure planning’. However, the District Plans offer very broad ideas on how to implement integrated delivery, few of which go to the heart of the current obstacles. The key obstacles remain ‘silo’ agencies and funding which demand an effective State Government response.

The Department commenced the preparation of Growth Infrastructure Plans (GIPs) over the last five years. These plans were to list and cost all the infrastructure required to support the planned growth in designated urban renewal areas (and what are now called Priority Growth Areas). PIA understands that much work on these plans was done but none of the plans were ever publicly released – nor were they influential in the infrastructure prioritisation process across Government.

It is understood that the GIPs appear to be morphing into Land Use and Infrastructure Strategies, or LUISs. The draft LUIS for the Bayside West Priority Growth Area (PGA) is a worthwhile document and it is expected that the other PGAs will have similar details in terms of infrastructure schedule.

What continues to be missing is stronger inter-agency decision making architecture to determine and deliver the infrastructure. Despite repeated announcements and attempts to remove the bureaucratic silos, infrastructure delivery is as fragmented and unwieldy as ever. The public expects that all new greenfield and brownfield development areas / PGAs will be matched by properly coordinated infrastructure investment to meet the demands of the growth. Otherwise there will be further network congestion and further erosion of quality of life.

DPE and now GSC are supposed to be the coordinator of the infrastructure delivery authorities in the planning of PGAs, but this rarely happens. Other agencies are allowed to continue the old practice of politely participating in planning exercises only to put off making decisions on preferred infrastructure options. Budgetary limitations is a common excuse for infrastructure planning and delivery being slowed down or stalled. While these limitations are real, this should not be a reason for the planning to stall.

This problem has been compounded by the premature release of Priority Growth Area (PGA) draft structure plans for public comment, with no accompanying infrastructure funding plan. The Sydenham to Bankstown Corridor and Parramatta Road Corridor plans are examples of
this. These plans show at a street block level the draft zoning, floor space and height provisions that will allow tens of thousands of extra dwellings. However, there is no detail on what the level of developer contributions that will be needed to pay for the infrastructure required to meet that growth. There have been a few precincts (e.g. Parramatta Light Rail corridor) where a SIC rate has been announced concurrently with the land use plan, but this has been rare. And who is to say whether that level of contribution will be sufficient? What has tended to happen is that the structure plans are exhibited, and the owners of land proposed to be up-zoned sell land to developers on the legitimate expectation that the Government will not impose more than a token contribution amount on the future developments. The land owners thus pocket all the windfall that comes with up zoning, leaving no room for the developer or community to receive some share of the value uplift to allow it to be reinvested in infrastructure upgrades.

There is little discussion in the plans about how the extra needs for higher order social infrastructure such as hospitals and schools will be met. The overcrowding of particularly primary schools in many parts of inner and middle Sydney is a major issue for the communities in these areas. This is a current problem that will only be exacerbated with the extra development and populations envisaged under the District Plans. The District Plans should provide detail on the likely number of extra facilities in existing schools and the number of new schools that will be needed to support the housing targets. Detailed planning that has been done by the Department of Education should be included in the District Plans.

Key Transport Corridors and Links

The District Plans state that as Greater Sydney grows, we need to more efficiently and effectively align land use planning and infrastructure investment. The plans do not explain how this will be done. The plans do not explain how infrastructure agencies will be accountable for supplying the infrastructure necessary to sustain the development that will enable the District Plan job and population targets.

The District Plans indicate that the GSC will take a lead role in preparing an Annual Infrastructure Priority List. But this is only a start. The GSC should go further and be accountable for the timely delivery of the Priority Infrastructure List. The District Plan’s strategy to use its ‘cross-agency Infrastructure Delivery Committee to facilitate collaboration on infrastructure issues across districts’ is not enough. The GSC must be the conduit for infrastructure delivery, not just another stakeholder agency.

The District Plans should set out the district scale outcomes and the necessary transport links to support new growth within and between districts. The District Plans should not wait for the long term transport masterplan revision for this – but should lead by defining the conceptual links and patterns of demand. This means identifying future (mostly orbital) transit corridors to support growth and better network the city, boost agglomeration economies and provide more homes with access to centres and jobs. Key links should strengthen the proposed three city structure and include consideration of the role of the following potential transit corridors:

- Parramatta to:
  - Macquarie Park
  - Bankstown and Southern Sydney
  - Castle Hill
  - Olympic Park
  - Sydney CBD (high capacity)
• Outer West Orbital Corridor (N-S): NarreIlan / Leppington – Western Sydney Airport – St Marys / Penrith and to NW Sector (Marsden Park / Rouse Hill)
• Western Sydney Airport to SW Sector (Marsden Park / Rouse Hill)
• Inner West to Anzac Parade
• Brookvale to Chatwood

While planning is well advanced for major road freight corridors, the key rail freight corridors necessary to better integrate Port Botany with key intermodal terminals requires further planning consideration especially the

**Infrastructure Funding and Value Capture**

Increased support and acceptance of higher housing densities depends to a significant extent on demonstrably firm commitments to upgrade the infrastructure to support the demands created by the extra populations and improve liveability. However, what the community sees happening is land values increasing due to rezoning but little return in terms of infrastructure investment. This is the basis for considering a regional levy in infill areas.

This is particularly acute in inner and middle ring Sydney where extra land for open space facilities is needed, but the land acquisition cost is prohibitively expensive. No support is provided to councils whose main funding mechanism for new open space – section 94 contributions from developers – has been arbitrarily capped at $20,000 per dwelling since 2010. No indexing of this figure has been allowed so the amount has been declining in real terms, while land prices have at least doubled in many areas.

This declining contribution is expected to fund all the road, drainage, parks, recreation and community facility upgrades caused by the extra population. It is obviously insufficient, network and facility congestion is increasing as a result, and the quality of life of Sydney residents is declining. The Government cannot expect the community to support increased density in their areas while there is such minimal re-investment in economic and social infrastructure. There should be a raising of the section 94 cap, new local taxes or other funding mechanisms to allow sufficient investment.

The Government is right to assign priority to the game-changing infrastructure projects that will shape the city, such as Westconnex, light rail and metro rail projects, and the second airport. But it cannot ignore the local and district level economic and social infrastructure projects – the new roads, intersections, cycleways, parks, playing fields, community centres and recreation facilities - that are also needed in the areas that have been rezoned, or are soon to be rezoned, for substantial additional development.

The $198 million Urban Amenity Improvement Plan, representing a Government investment in the Parramatta Road Corridor, is a worthwhile funding initiative that needs to be replicated in all Priority Growth Areas and sustained by a consistent revenue stream to see through each phase of delivery.

The District Plans provide no direction on the role of value sharing as a tool in funding the additional infrastructure needs. They provide only a general discussion of the opportunities and conclude with the statement that the GSC will ‘work across government on the amount, mechanisms and purpose of value sharing to create a more consistent approach to capturing value for public benefit, complementary with other existing mechanisms’. The comments in the plans do not add to what is already known about value sharing.
There should be more detail on value capture (or sharing) in the District Plans. For example, the plans should have adopted a principle that a percentage of any uplift in the residual land value of a site due to a change of planning controls in a Priority Growth Area should be returned to the community by payment or provision of enabling infrastructure. The GSC should list the infrastructure types that would be paid for from a value sharing contribution. The GSC should identify what portion of the contribution will go towards major State infrastructure (like major transport links), and what portion (if any) would go towards local infrastructure. The District Plans are about implementation and setting direction for investment. Establishing value sharing benchmarks are important for investors in land development to understand as early as possible.

Value capture should not be implemented instead of other forms of ‘user pays’ contributions, such as s94A, but should be seen as an additive form of contribution. The value uplift that planning decisions (including transport and up-zoning) generate is an unearned windfall gain to the land owner from the public. Planning decisions are made in the public interest and the value of land is created by planning decisions. Therefore, value uplift is conceptually community property and the community have a legitimate claim to the benefits created by planning decisions. To this extent, value capture is not just a valuable funding mechanism, but a fundamental equity issue that places the public interest at the forefront of planning. This concept sits alongside contributions from development relating to the portion of future demand they generate for the use growth infrastructure (ie s94).

By linking increases in density to infrastructure improvements, value capture not only ties increases in demand generated by additional persons, but also links the planning externalities associated with additional development to improved or at least maintained levels of liveability. Hence value capture creates a connection between increased development and liveability. This connection or nexus is very important, particularly given the NSW Government’s intentions to accommodate further growth in existing urban areas.

PIA recommend that the District Plans set out how State and Local infrastructure funding mechanisms would apply to growth areas. In particular, clarifying the scale and purpose of SICs, S94 / S94A contributions and the role of Voluntary Planning Agreements. PIA recommends that comprehensive growth precinct infrastructure plans and their funding regimes be announced at the same time as release of structure plans and potential rezoning in order to manage speculation and enable value capture. The GSC have a clear role in establishing the infrastructure priority list and brokering the delivery of the infrastructure and funding in support of place outcomes included in the District Plans.

B.4 ENVIRONMENTAL PERFORMANCE, HEALTH AND WELLBEING

Support for green and blue webs

PIA supports the District Plans strong environmental narrative concerning the value of a ‘green web’ – a network of vegetated open space corridors across Sydney as well as the enhancement of a ‘blue web’ recognising the landscape and biodiversity values of a healthy South Creek waterway and catchment. Both initiatives will also contribute to liveability and health by offering recreational trails and mitigation of the heat effects that are increasingly impacting Western Sydney. PIA promote health and wellbeing through good design, active transport, walkability and housing adaptability in our submission on the planning reform bill.

PIA support a range of tangible planning and funding measures to deliver the webs including
infrastructure contributions, value capture and regional levies. PIA is aware of the valuable open space legacy of the Sydney Region Development Fund and argue that a scheme of comparable breadth is needed. While a special fund has been considered to fund the green grid, the funding figure provided to date is very limited. Councils are concerned whether they are expected to acquire the land – and whether developer contributions would be captured towards their implementation.

Green grid should also identify priority or key biodiversity corridors in order that the can be conserved and preserved, and clarity if provided to all stakeholders. This is what was provided in Western Sydney Parkland Trust and sets a benchmark for moving forward.

Support for zero net carbon outcomes

The aspiration for zero net carbon precincts (and ultimately Greater Sydney) are strongly supported by PIA. The specific actions should be supported in the so-called ‘collaboration areas’ such as Liverpool (as a beginning) – but should be specifically targeted in all new priority growth precincts. PIA recommends that guidelines, advice and training be made available to understand what is proposed for collaboration areas and the achievement of zero net carbon outcomes. PIA would be pleased to contribute industry expertise in the development of ‘collaboration areas’ and are already working with OEH on initiatives to improve the environmental performance of the built environment beyond BASIX and precinct wide sustainability measuring tools.

PIA are supporting OEH and DPE to strengthen current BASIX assessment – towards mandating higher energy, water and thermal comfort performance and support collaboration for precinct scale zero net carbon objectives. PIA also recommend that these environmental initiatives are integrated with good design for health and wellbeing. The measurement of preventative health (with an emphasis on walkability and design) as well as environmental indicators should be included in the GSC dashboard.

PIA also recommend that these environmental initiatives are integrated with good design for health and wellbeing. The measurement of preventative health (with an emphasis on walkability and design) as well as environmental indicators should be included in the GSC dashboard.

B.5 GOVERNANCE AND DELIVERY VIA THE PLANNING SYSTEM

District Plans should detail the development pattern, infrastructure provision and upgrading needs that align with the Metro Plan and provide direct, tangible connection along the “line of sight” to direct Local Strategic Planning Statements which have to be mandated to be fully consistent with the District Plans. The District Plans as currently drafted to fail to do this and the District Plans only make statements of self-evident planning principles under the headings of Priorities and Actions such as: “Align land use planning and infrastructure planning” and “report on local planning”.

Any variation proposed in a Local Strategic Planning Statement by a Council should be only accepted by sign off by a delegate within the GSC. There should be subsidiarity in the allocation of decision making power across agencies and between the GSC and Local Government to ensure achievement of the Metro Plan for “the optimal public good”. The GSC needs to be empowered as the single spatial planning authority to drive a common metropolitan growth planning agenda across all agencies. It should not become bogged down in the administration functions of planning. The role and interface with the DPE needs to be clarified in this regard.
C. PIA DISTRICT PLAN SPECIFIC SUBMISSIONS

C.1 DRAFT CENTRAL DISTRICT PLAN

C.1.1 OVERVIEW CENTRAL DISTRICT

- The vision should be for a fine grain network of transit connected and liveable centres.
- The Plan should highlight opportunities for transit links between the Inner West and the Anzac Parade Corridor and linking the Bays Precinct with Sydney CBD and Inner West.
- Meeting housing targets requires greater attention to development outside priority growth areas and corridors – re-evaluating the capacity of many accessible centres and suburbs.
- The delivery of affordable housing is regarded as critical social infrastructure for the Central District.

C.1.2 VISION AND NARRATIVE – CENTRAL DISTRICT

The vision and narrative set by the Draft Central District Plan clearly outlines an intention to protect and enhance the role of the central district as the core of Global Sydney. The actions identified within the Draft Plan provide board guidance statements for the development in the Central District but do not appear to fully comprehend some of the key challenges that will face Central Sydney between now and 2036.

The Draft Plan established aspirational growth parameters through statements such as:

- It will remain an attractive place to live,
- The District’s many centres and key places will be enlivened, with facilities and services that support vibrant day and night activities
- the Central District will be a model of sustainable planning and development

Despite the aspirational nature of the vision and narrative within the Draft Plan, insufficient consideration appears to have been given to some of the key challenges that are likely to be faced by the Central District, such as maintaining an inclusive central district to which everyone has access to core cultural facilities and within which access to housing and jobs is available as required.

C.1.3 HOUSING - CENTRAL

Dwelling targets within the Draft Plan should be sufficient, appropriate, and achievable. The Draft Plan provides five-year dwelling targets for each of the LGAs within the district area. 46,550 dwellings are forecasted to be required over the coming five years within the Central District, this can be extrapolated to indicate that 9,310 new dwellings (completions) are required each year.

Although the Draft Plan does recognise that there are opportunities in Central District to deliver beyond this minimum dwelling need in the short term, the Plan should go further to make it clear that the housing delivery targets provided should be viewed as a minimum target.
The dwelling targets provided within the Draft Plan appear to have been developed from the Department of Planning and Environment’s population predictions. As such, the dwelling targets do not allow for any additional provision of dwellings (i.e. in excess of the projected increase in population), which would be necessary if current trends towards lower occupancy rates continue over the coming five years. The dwelling targets are therefore unlikely to address the current shortage of dwellings in the Central District.

Further, the dwelling targets within the Draft District Plan do not address the fact that, despite current rates of dwelling approvals and completions being at their highest for over ten years, current rates will need to increase further if the five-year targets are to be met. As such, the dwelling targets within the Draft Central District Plan will be a challenge to achieve.

The Draft Plan encourages redevelopment around transport corridors, which is supported. However, it is clear that this approach alone will not be sufficient. The Draft Plan should go further in advocating for greater density, and greater dwelling diversity across the city complemented by liveability improvements meeting the needs of future and existing residents and visitors.

C.1.4 SPECIFIC INFRASTRUCTURE NEEDS - CENTRAL

The Draft Plan does not adequately set out specific infrastructure needs for the Central District. Although the Draft Plan does identify the recent Westconnex project (Action P8 Improve connections and amenity along the WestConnex corridor) no wider consideration is given to the specific infrastructure needs of the Central District. The Draft Plan should go further in prioritising the delivery of infrastructure that encourages healthy lifestyle choices (e.g. cycle lanes for healthy transport and access to open space) and should de-prioritise or actively discourage car use. The Central District is generally well served by radial public transportation and therefore if any part of Sydney will be able to develop into an exemplar of a 21st century, post car, city, the Central District should be leading the way.

Further emphasis should be placed on formal recreation within the draft Plan. The ‘Liveable City’ component of the plan deals with many aspects of creating vibrant, healthy, attractive places to live but does not adequately consider the future provision of open space for formal recreation.

C.1.5 CENTRES, JOBS AND ECONOMIC DEVELOPMENT - CENTRAL

The Draft Plan identifies specific job targets for each of the District and Strategic Centre in the Central District. Some of these targets are linked to specific roles and are supported by actions, others are not. The roles of Randwick Heath and Education Precinct, Port Botany and Sydney Airport Precinct Strategic Centres are clear and well defined. Other centres have less well-defined roles. Up to 20,500 (34% increase over 2016) additional jobs are targeted in Green Square and an additional 6,700 (48% increase over 2016) are targeted in Bondi Junction without a well-defined plan to achieve this target.

The Draft Plan should consider how new jobs will be provided and fully consider the employment impact of the emerging new economy.

C.1.6 EMPLOYMENT LANDS - CENTRAL

The Draft Plan should highlight a shift in the key employment driver of the Central District towards the knowledge and service sector and its needs for connectivity, information and a
quality working environment.

The stated priority to take ‘a precautionary approach to the conversion of employment and urban services land’ is supported by PIA with a view to enhancing urban services as well as higher intensity employment functions. Lack of current viability should not be fundamental criteria when planning for the longterm use employment lands in Central Sydney.

C.1.7 TRANSPORT AND OTHER INFRASTRUCTURE - CENTRAL

As noted above in Section 3, the provision of transport infrastructure is not well considered within the Central District Plan. The Draft Plan could have been the great tool for steering the right investment in transit infrastructure in the right locations. Instead the plan is largely silent on the need for improved public transit and cycling infrastructure. The District Plan should emphasize the importance of a stronger network of orbital connections to improve connections and improve agglomeration economies in the District. The Plan should highlight opportunities for transit links between the Inner West and the Anzac Parade Corridor and linking the Bays Precinct with Sydney CBD and Inner West.

The recognition that Sydney is developing as three cities which are close and connected leads to the important recognition that a connecting transport strategy is essential and urgent. A high capacity rail connection between the three centres must be a priority to provide this connection. While it will enable the three centres to operate as local CBDs and as an integrated world class city, it will also assist housing affordability by enabling city workers to access their specific employment focus from a far wider area.

C.1.8 LIVEABILITY AND ENVIRONMENT - CENTRAL

The Draft Plan provides for the creation of an ambitious green grid, including expanding the existing coastal walk for the length of the east coast and harbour foreshore. The provisions relating to green space appear to be well conceived as they not only identify where green space needs to be developed, but also identify opportunities for sharing space with sports that are currently exclusively over-serviced, such as golf.

C.2 DRAFT WEST CENTRAL DISTRICT PLAN

C.2.1 OVERVIEW - WEST CENTRAL DISTRICT

- Parramatta should be recognised as Sydney’s Central City.
- To achieve its status as Sydney’s Central City, it needs to:
  - be better networked by transit with its inner suburbs and employment hubs at Westmead, Rydalmere and along GPOP
  - be linked by rapid high capacity transit with Sydney CBD, Macquarie Park, WSA, Castle Hill, Bankstown/South District
  - retain capacity for commercial growth in its CBD and inner suburbs
  - develop high intensity residential inner suburbs with supporting amenity and local connectivity – including a strong affordable housing component
• be connected via a green grid of open space
• set and achieve aspirational environmental performance standards

C.2.2 VISION AND NARRATIVE - WEST CENTRAL DISTRICT

The concept of the three cities which has been developed during the formation of the District Plans is clearly an important initiative recognising the growth needs of the city of Sydney as a whole, with specific recognition of the fact that the new western city has added an important dimension based around the new airport. Previously the discussion was around a city with an eastern CBD and a western CBD and Parramatta was relishing its emerging prominence as the western growth CBD.

What could emerge from this evolving focus is a strategic infrastructure plan which envisages the size and shape of the new city, predicts its transport, utility, open space, and general infrastructure needs and puts certain principles in place at this early stage.

The aim would be to avoid the necessary but late provision of infrastructure to maintain the operations of an existing city as is currently happening to the eastern city, where bridges, tunnels and connections are being developed at enormous expense and disruption to manage the forces of growth.

C.2.3 HOUSING - WEST CENTRAL

Twenty year housing targets are required at a local government level rather than only at the district level. The 5 year targets at the local government level are not adequate for planning purposes.

C.2.4 SPECIFIC INFRASTRUCTURE NEEDS - WEST CENTRAL

The West Central District plan highlights the growing prominence of the Greater Parramatta to Olympic Park (GPOP) corridor but does not provide adequate detail on the critical infrastructure support issues including the Parramatta Light Rail. An essential infrastructure plan is essential for the future and in fact its absence is evident now. The recent decision to delay light rail planning is discouraging and does not provide a strategic planning framework for the District.

C.2.5 CENTRES, JOBS AND ECONOMIC DEVELOPMENT - WEST CENTRAL

The previous draft subregional strategy included a centres hierarchy which included neighbourhood centres, small villages, villages and town centres. This strategy has been discontinued in favour of a single “local centre” terminology. Many councils prefer a more rigorous hierarchy of centres to assist their prioritisation of services, amenities and infrastructure spending. A centres hierarchy assists the planning for employment, services and public transport provision and guides appropriate allocation of housing density via LEPs.

C.2.6 EMPLOYMENT LANDS - WEST CENTRAL

Guidance on employment lands is important as it is evident that the Sydney as a whole is experiencing different pressures on these lands. In the east, the pressure is leading to the replacement of employment lands with residential development. In the west, however the
employment opportunities would appear to be growing requiring an employment strategy to match the housing strategy. The clear role employment lands in providing urban services (eg recycling areas, bus depots, batching plants) should also be highly valued for their contribution to the economy – even where some of these uses are not jobs rich.

There are estimated to be an existing 70,000 jobs provided by the Parramatta CBD, Westmead Health precinct, and Sydney Olympic Park. A strategy to promote employment opportunities presented by these employment nodes and new opportunities is essential for the efficient and effective growth of the west central district.

C.2.7 TRANSPORT AND OTHER INFRASTRUCTURE - WEST CENTRAL

The recognition that Sydney is developing as three cities which are close and connected leads to the important recognition that a connecting transport strategy is essential and urgent. A rail connection between the three centres must be a priority to provide this connection. While it will enable the three centres to operate as local CBDs and as an integrated world class city, it will also assist housing affordability by enabling city workers to access their specific employment focus from a far wider area.

C.2.8 LIVEABILITY AND ENVIRONMENT - WEST CENTRAL

The principles of Sydney’s Green Grid have particular application in the Central West District where 13% of the District is open space of which 58% is regional open space. The District Plan offers the real opportunity of identifying the integration of the Green and Blue Grids into the developing urban framework prior to losing opportunities to encroaching development. The issue of funding to ensure land is either acquired or retained for public purposes needs some consideration. Funding sources cited include the Metropolitan Greenspace program (requiring council matching funding), Environmental Trust grants programs and Sydney’s Walking Future and Sydney’s Cycling Future programs. The appropriate time to determine green space needs and, if necessary, acquire additional lands is at the earliest stages prior to rezoning or plans identifying areas for future release. It is suggested that the provision of funds for investigation of the expansion of the green grid is an important priority to ensure that planning for open space is undertaken ahead of encroaching urban expansion.

C.2.9 METROPOLITAN RURAL AREAS - WEST CENTRAL

The West Central District Plan supports continued agricultural production in the outer North West of Sydney. The Metropolitan Rural Area while also inviting councils to plan for expansion of rural residential development. There appears to be a conflict in the approach that encourages councils to identify lands as urban investigation areas, but appears to be somewhat understated in the area of identifying, conserving and enhancing the opportunities for agricultural production in Sydney’s west. For example, the areas on city fringes are usually used for agriculture of an intensive nature involving irrigation, spraying, machinery noise, animal noise etc. Often these forms of agriculture are incompatible with rural residential and residential development, and will be gradually excluded from the District as conflicting forms of development expand. The Plan could well advocate for buffers, specific exclusions of certain land uses and promote agriculture forms suitable to the locality.

C.3 DRAFT NORTH DISTRICT PLAN
C.3.1 OVERVIEW NORTH DISTRICT

- North District should benefit from orbital transit links both with Eastern and Central City, especially between Parramatta – Macquarie Park - Chatswood - Brookvale.
- Provision of a diversity of housing types including affordable housing and promoting adaptable housing in response to an aging population are critical for the North District.
- Planning for health and wellbeing including sufficient recreation opportunities and a focus on design and local accessibility, should be further considered in the Plan.

C.3.2 VISION AND NARRATIVE – NORTH DISTRICT

The thrust of Draft Plan is strongly supported. It provides well considered long term priorities for the North District and specifies the following aims:

- Grow jobs in centres and on employment and urban services land
- Optimise Northern Beaches Hospital as a catalyst for a new centre
- Plan for demographic change
- Create affordable and diverse housing
- Protect the natural landscape
- Manage natural hazards
- Protect heritage, character and liveability

The District Plan narrative could be expanded in several areas with clearer place specific interventions to achieve the aims:

- The opportunities for improved workforce productivity with better transport integration between the inner north and northern beaches – and the global economic corridor and with Parramatta as an emerging Central City.
- Specific narrative and spatial direction on how the Strategic and District Centres should have distinct roles from each other – while still making their contribution towards metro outcomes.
- To house a very high proportion of over 65s (75,100 people over 65 by 2036) – especially wider availability of adaptable housing.
- To introduce affordable housing stock into the North District market to ensure key workers and people on low to moderate incomes can continue to live in the area. The proposed targets are supported.
- To directly address actions to promote health and wellbeing through good design, active transport, walkability and housing availability.

C.3.3 HOUSING - NORTH

The nominated 5-year housing targets by LGA are modest (26,000 people) and councils would be able to accommodate them mostly under existing zones. However, in advance of infrastructure planning it is difficult to accurately allocate the overall growth of 196,350 people to 2036 throughout the District.
The priorities for housing will be:

- Providing a diversity of medium density housing types in accessible locations with respect to both local services and access to the global economy.
- Increasing the proportion of adaptable housing suitable for aging in place – a target should be developed among councils, community and the development industry.
- Delivery of affordable housing based on the targets set in the District Plan.
- Progression of land release in the North West Growth Centre according to the structure plan.

Willoughby Council and North Sydney have achieved substantial success with SEPP 70 Inclusionary zoning measures to deliver affordable housing stock. The advantages of this tool should be maintained as the basis for a model code for inclusionary zoning throughout the District.

C.3.5 CENTRES, JOBS AND ECONOMIC DEVELOPMENT - NORTH

There are 116,200 additional jobs forecasted for the North District by 2036. Job targets for strategic and district centres indicate substantial (>10K) job growth in Macquarie Park and North Sydney and moderate growth (3-10K) in Chatswood, Northern Beaches Hospital precinct, St Leonards, Brookvale and Hornsby.

The District role of key centres should be better distinguished and supported by actions in the Plan – with structure planning to enhance their capacity for commercial and residential growth according to their roles and opportunities and the need to preserve and enhance commercial capacity. A precautionary approach regarding mixed use residential rezoning of commercial cores is appropriate where substantial job growth is expected.

The Inner North employment centres of North Sydney, St Leonards, Chatswood and Macquarie Park are well connected with Eastern City and the Global Economic Corridor. However, interaction with Central City (Parramatta) is constrained by constrained road and poor transit connections between Brookvale – Frenchs Forest – Chatswood – Macquarie Park and Parramatta. Poor radial connections limit the opportunities for enterprises and workers to integrate with Sydney’s global economy. This has an effect on labour productivity in the North District.

C.3.6 EMPLOYMENT LANDS - NORTH

The District Plan is supported in applying a precautionary approach using a net community benefit test to consider the rezoning of industrial lands. The Artarmon and Brookvale areas perform a critical enabling role for employment and urban services across the district. The District Plan should also include a spatial structure plan recognising and protecting these areas, and business parks, from residential conversion and assisting in identifying the most important employment and urban services lands – as well as making provision for future growth and employment intensification over time.

C.3.7 TRANSPORT AND OTHER INFRASTRUCTURE - NORTH

In addition to committed transport infrastructure the following initiatives should be included in the final District Plan as part of an integrated transport strategy:
• Macquarie Park to Parramatta metro rail line
• Incorporation of a dedicated bus transitway lane between Brookvale and Chatswood along Warringah Rd supporting the growth of Frenchs Forest Hospital Precinct
• Inclusion of dedicated bus transitway in proposed extension of motorway harbour crossing of Sydney and Middle Harbours
• Consideration of a spur metro rail line (supporting the Military Rd Mosman Corridor) from Willoughby/Cammeray to Spit Junction
• Integration of the cumulative traffic and transport demands arising from the development of Ingleside and Warriewood Valley on the Mona Vale Rd, Warringah Rd and Pittwater/Military Rd Corridors

Council inputs have highlighted school capacity issues that have not been adequately predicted and planned in orderly fashion in areas throughout the North District. The availability of open space – including playing fields has also been identified as a growth infrastructure challenge.

C.3.8 LIVEABILITY AND ENVIRONMENT – NORTH

The tree cover and waterways are key assets of the North District. Investment is encouraged in the Green and Blue Webs and especially in programs to manage urban heat while improving streetscape, walkability and local recreation opportunities.

The district reports increasing demand for open space and activity. A sport and recreation participation plan and a regional recreational infrastructure plan are warranted and will make a call on resources to support growth. Specific centres including St Leonards have a higher need for local open space.

C.3.9 METROPOLITAN RURAL AREAS -NORTH

While much of the District’s outer edge is included in National Park, the Dural-Galston area retains a strong rural character which is supported by the plan. The Plan relies on the plan priorities for MRA conservation and the results of any future sustainability investigations to determine whether any future urban rezoning is warranted. The preferred approach is to include a clear policy statement that urban rezoning proposals will not be considered for the reasons set out in the District Plan, while setting out the circumstances where small lot rural subdivision is accepted.

C.4 DRAFT SOUTH DISTRICT PLAN

C.4.1 OVERVIEW SOUTH DISTRICT

• A focus on place making and supporting growth with the necessary economic and social infrastructure to improve liveability is the critical concern for the South District – especially regarding the Sydenham to Bankstown corridor growth.

• Stronger orbital transit connections between Southern Sydney via Bankstown to Parramatta will link the South and its labour market to the emerging Central City.

• Bankstown should be recognized and supported as a strategic centre.
C.4.2 VISION AND NARRATIVE – SOUTH DISTRICT

The vision for the south district plan could be strengthened by giving a clear spatial picture of key structural elements necessary for the district, including:

- where key growth will occur in employment and housing - centres, corridors, strategic landholdings
- which centres have primary role for the south district
- transport connectivity between centres (including to Central and Western Cities) and corridors – new transport infrastructure and improvements
- specific green grid initiatives which will improve access to green space ‘web’ and thereby the national parks and other natural features.
- the summary vision should be communicated in plan graphics to support the text.

The South District by nature is geographically distant from the three cities. Enhanced connections will be made from Canterbury-Bankstown into the Eastern City through the Sydney Metro and this transport initiative is supported. But there is a lack of transport connections to the Central and Western Cities, that can only be realised by increase in capacity of existing or new transport connections (particularly rail), which will support access to most of the metropolitan jobs. More people in the South District access jobs outside of the District than inside it. This means transport connectivity is critical for this district.

Liveability is one of the over-arching key priorities of the draft plan. But those factors which are important to people’s lives are not well communicated. The concept of liveability is the reason why people want to live in a place. If this is balanced right across the district and metropolitan area, then this means the broader social, economic and environmental interests are already factored in. A place-making approach is important in this context. The liveability priority could well be raised as the first and most important priority.

C.4.3 HOUSING - SOUTH

It is unclear how the GSC arrived at the 5-year housing targets and that the targets can be realised in some areas without considerable investment in and timely provision of infrastructure.

Canterbury-Bankstown has the fourth highest housing target of Councils in the Greater Sydney Region, at 13,250 new dwellings in the next 5 years but the source of this growth needs to be presented given that some key projects commence further into the future post metro. The Sydenham to Bankstown rail corridor will become operational beyond the timeframe of the housing target with the potential for lagging transport infrastructure, the absence of other supporting infrastructure, and mechanisms and funding to achieve the necessary infrastructure. Development and infrastructure should be staged appropriately.

In Sutherland 60% of workers leave the Shire for jobs. The current overcapacity of the T4 Illawarra rail line in the morning peak needs to be examined in light of housing targets along this corridor, and the ability for additional services to be provided, or some other solution.

The locations for housing growth should be relatively balanced across the district, but with the focus close to existing and proposed employment and/or public transport nodes, and other services.
Housing types and diversity

There is little direction or policy in the draft district plan on housing types and diversity, such as where the housing types should be located, tools to ensure certain types develop or not develop more in some areas, and the varying needs of infrastructure to support the different types.

The draft plan refers that while there is a case for all housing types and sizes in the south district, that housing for smaller households is increasingly in demand. It pushes the housing diversity agenda primarily back to Councils, and suggests Government will provide them the data and tools for Council to provide housing diversity to meet the existing and future local housing market. PIA notes there needs to be more policy direction and guidance on this by GSC at a district-level, while still allowing councils the flexibility to allow for some local variation.

Affordable Housing

The implementation of an affordable housing policy for Sydney is welcomed. The mechanisms to implement it are not fully known:

- It is considered that affordable rental housing should not be limited to urban renewal and greenfield areas. The idea of Sutherland Council has merit, which is for each spot rezoning seeking a change in zone or uplift, a proportion of total floorspace be dedicated to affordable rental housing, as developers will be making a substantial profit in the change of use and/or uplift in any case.
- Given the current housing affordability crisis in Sydney, it is suggested the affordable rental housing target be increased to make an impact across the south district and metropolitan area generally with the policy.
- The mechanisms by which affordable housing will be delivered are unknown. It is also unclear whether the affordable rental housing as defined under the draft plan, will be in perpetuity.

C.4.4 SPECIFIC INFRASTRUCTURE NEEDS - SOUTH

The Sydenham to Bankstown Urban Renewal Corridor Strategy has been exhibited and the State Government has committed to re-exhibit the draft strategy. Whilst at the same time, the draft south district plan includes substantial housing targets from the urban renewal along this corridor.

It is understood that there should be substantial increase in densities along the Sydenham to Bankstown Urban Renewal Corridor to make the most of enhanced transport infrastructure, and to provide housing supply with good access to employment. And it is acknowledged that there is an existing train line and stations in the same locations along the corridor as proposed in any case which will serve new development in the interim. However, there needs to be the right framework in place from the outset for value capture to fund all necessary improvements. This is also so as developers can factor this into their development feasibility from the outset.

Some urban renewal should occur in advance of the Metro line, but it should be carefully thought through and that development and infrastructure is staged appropriately. It is more important to build the highest possible densities near existing rail stations and stage other
development later.

C.4.5 CENTRES, JOBS AND ECONOMIC DEVELOPMENT - SOUTH

There is a lack of vision, rationale and definition of centre types and the role they will play into the future:

- The Plan only defines Strategic and District Centres, with the only Strategic Centre in the South District being Kogarah. It is questioned why there are not more Strategic Centres in such a large and diverse district – and especially Bankstown given its pivotal position between the ‘Central City’ and South District.
- The demotion of Bankstown (and Bankstown Airport-Milperra) is not supported. The jobs criteria used do not tell the full strategic picture for the long term. Canterbury-Bankstown LGA has the largest population in NSW, the fourth highest housing targets in the Greater Sydney Metropolitan area, and Bankstown CBD is at the end of the new Metro line which will reduce commuting times of residents into the Eastern City, and Bankstown CBD will experience urban renewal resulting from the Metro. This demotion in centres hierarchy is not warranted. An economic development strategy should be developed for this area to meet its potential.
- Cronulla appears to be an anomaly as a local centre.
- The District Plan should provide more guidance on the future role and hierarchy of centres to certainty to Councils and developers alike to manage redevelopment in a more orderly basis.

C.4.6 EMPLOYMENT LANDS - SOUTH

The growth of jobs in centres and the leveraging of health and education assets as catalysts for smart jobs are supported. In Sutherland LGA, most residents commute out of the LGA for work. The creation of local employment is therefore supported.

The draft plan recommends a precautionary approach taken to rezoning or adding other permissible uses to employment zoned land. This is welcomed by so employment and urban services can play their important urban support role in the economy and offer local jobs.

It is welcomed that further work will be done for a district-wide assessment of the values and objectives of employment zoned land in collaboration with Councils.

C.4.7 TRANSPORT AND OTHER INFRASTRUCTURE - SOUTH

Transport

The draft south district plan is not an integrated land use and transport strategy. It is expected the next plan iteration will address this deficiency. The connectivity of areas is critical to the liveability priority under the draft plan. With the Three Cities concept, it is also critical that the South District is well connected to each of the three cities to ensure there is good access to most jobs.

The 30-minute access to jobs concept is supported, but naturally it must be reinforced with actual implementation of transport infrastructure including key rail, road and other improvements:
• Transit links between South District and Parramatta (via Bankstown) are critical. All strategic centres in the south district need good north-south connection/s and western connection/s (rail and road) to the Central City
• (Parramatta and GPOP) and Western City (aerotropolis) to access key job growth areas.
• Access to employment remains a critical issue for parts of the district, notably in Sutherland and Georges River LGAs.
• Canterbury-Bankstown LGA – access to jobs in the Eastern City will be strengthened with the advent of the new Metro line.
• To this end the F6 extension between the M1 motorway and the Greater Sydney motorway network, with connections to WestConnex for Liverpool and Parramatta areas, is supported.

Sutherland Council has a proportion of its residents with medical skills and university attendance, and Shire residents will commute to Liverpool, where there is a university and hospital, in greater numbers. A high proportion of Shire residents are employed in airport-related jobs. To this end, good transport access is needed from this LGA to Liverpool and the new airport. Sutherland Council also identifies possible rail link or other public transport between Sutherland and Menai and Glenfield so that residents could access jobs in the ‘Western City’ and WSA.

Sutherland, Canterbury-Bankstown and Georges River Councils should also seek to achieve improved transport services to the ‘Eastern City’, and new north-south orbital connections (and preferably rail) to the ‘Central City’ (and further west) from these areas hubbing through Bankstown and Parramatta.

**C.4.8 LIVEABILITY AND ENVIRONMENT - SOUTH**

Green grid/web

The green web concept is strongly supported, but it is unknown how it will be implemented in practice and what it means in a broader policy sense with regards to who will fund acquisition or control and maintenance.

Liveability dividend with growth and change

For community acceptance of “densification” they need to realise there are associated and sufficient “liveability dividends” which will mean the existing and new population have the tools and resources needed to make their resulting lives “liveable”. This means adequate and timely delivery of infrastructure and services such as schools, health, recreational, social and cultural facilities and more, to meet the needs of those residents. The draft plan is relatively silent on funding and delivery mechanisms for this infrastructure, other than to say the GSC will work with various delivery agencies and the private sector to ensure it is provided, including on a value capture mechanism.

Environmental performance for new growth areas

The zero net carbon goal is supported. It is suggested new growth areas be subject to a mandatory the Green Star Communities rating to be determine by the GSC/Department. This of course would mean related legislation and guidelines would be required in the vein of
BASIX.

It is also suggested that the Green Star building rating of minimum 4 green stars is mandatory for application to sites over a certain size or $ value in renewal areas and corridors as defined by the Department/GSC.

**Local environmental conditions and hazards**

Canopy tree cover in streets is valued in southern communities for shade, which is increasingly important in the context of encouraging active lifestyles and rising temperatures, and it generally mitigates against heat gain. And it also provides visual amenity, fauna habitat and purifies the air.

However, some councils (eg Sutherland Council) have indicated, their efforts to promote greater street tree planting can be hampered by the RMS policy and practice of not having trees planted within a certain proximity of their infrastructure. This is an issue that the GSC should take up to resolve with the RMS as well as utility agencies, generally across the Greater Sydney Metropolitan area.

**C.4.9 METROPOLITAN RURAL AREAS - SOUTH**

The Metropolitan Rural Area in the Sutherland LGA includes land owned by the Gandangarra Local Aboriginal Land Council and this should be acknowledged.

**C.5 DRAFT SOUTH WEST DISTRICT PLAN**

**C.5.1 OVERVIEW SOUTH WEST DISTRICT**

- The South West District should integrate with Sydney, but future settlement in the District must also have its own internal connections, economy, services, employment and amenities - and be comparatively self-sufficient.

- This District should also focus on provision of key infrastructure linked to transport network, in this respect the Outer Sydney Orbital and M9 will be a city shaper, and thus the more refined alignment should be a key element for the vision and planning.

- The notion of an aerotropolis – an employment focussed hub integrated with WSA is supported but not at the expense of Regional Cities (Campbelltown – Macarthur, Liverpool) and important District Centres (Leppington, Narreellan, Oran Park) which should each be linked with WSA. Major centres should be connected to the global economy jobs potentially located near WSA and in Central and Eastern Cities.

- Rail connections linking Western Sydney Airport with Leppington and the Macarthur area as well as connecting with Central Sydney are important and should be delivered early.

- Place making via collaboration precincts in Liverpool and also Campbelltown-Macarthur are supported to improve environmental performance and the amenity of their commercial areas.
C.5.2 VISION AND NARRATIVE - SOUTH WEST DISTRICT

The vision for the south west should capture the significant opportunity that the District offers by being close to Wollongong and the Port Kembla, the major south west growth centre, the newly announced Greater MacArthur and Wilton Growth area, as well as the significant link that Northern Road has to the Western Sydney Airport. The vision captures some of the major strategic centres, with the themes of education and health (ie Campbelltown-Macarthur and Liverpool), but does not provide the vision of major employment areas, strategies or key infrastructure investment.

The District is changing and will continue to change if the Western City Deal is implemented, with joint funding with the Federal Government. As did the M7, the character and vision will change in the District. The planning of the new growth areas will create a new urban narrative, but the key bushland, rivers, ridgelines and scenic areas should be retained with clear ownership and funding for their sustainability.

C.5.3 HOUSING - SOUTH WEST

This District has an amount of growth to capture and accommodate, with a more diverse range of housing types and housing prices to be provided to meet the housing needs.

The movement of established households and communities out of Fairfield, Liverpool and Campbelltown into the new housing estates of Camden or other growth areas is happening, and this means families like to stay in the district. The dramatic change in the housing market in the last decade with average lot sizes for dwellings falling from 500–600 sqm to 350–400 sqm (primarily driven by affordability and the escalation of the price of englobo unzoned and retail housing land) has occurred. Advice received by PIA members that suggests that the population projections for the South West LGA’s (p.97) may be low and fail to appreciate the housing diversity initiatives and new Estates currently underway or being proposed. Similarly, the South West District target of 143,000 by 2036 may be low particularly with the capacity to attract jobs and housing with the major key City Deals or city shapers.

It is recognised that there are additional housing opportunities and precincts outside the South West Growth Centre in Wollondilly and Campbelltown mostly within the recently announced Greater Macarthur Growth Area. These should be recognised and integrated in the District Plan to provide the vision and structure to accommodate their growth and offer direction to Council and investors. South West Sydney can be a significant contributor to the boosting of housing supply in Sydney if agencies can be coordinated and approval processes improved.

The Plan should also provide further guidance on infill areas in Campbelltown, Fairfield and Liverpool, as state Priority areas seem to be ad hoc, and not provide sufficient guidance to Councils to achieve the infill targets.

C.5.4 SPECIFIC INFRASTRUCTURE NEEDS - SOUTH WEST

Infrastructure funding in the south west growth centre is done on a stage by stage basis and this affects housing supply and is placing pressures on council resources and State Government to fund gaps. There is also little certainty for the community on timing of development. Infrastructure if provided at no additional costs to government needs to ensure reasonable and appropriate infrastructure provided to meet the community needs.
C.5.5 CENTRES, JOBS AND ECONOMIC DEVELOPMENT - SOUTHWEST

The Plan offers a centres hierarchy (Figure 3.3) which recognises Liverpool, Campbelltown-Macarthur and WS Airport as Strategic Centres and Leppington, Narrellan and Fairfield as District Centres. The category of Regional City, previously Liverpool, Campbelltown-Macarthur and Penrith has been lost in favour of a conceptual centre at Western Sydney Airport. The potential Wilton Strategic Centre in the Greater Macarthur Investigation Area is also not included. The Plan in Part 3.2.5 defers consideration of a centres hierarchy to the outcomes of future work, which does not provide a holistic view across the District and to ensure the right investment is pulled to the higher level centre. The local centres in the Centres Map of the Map Book unfortunately do not provide a full picture, and seems to confuse levels of centres.

Liverpool is identified as a Collaboration Area with potential for action to achieve a zero net carbon outcome, however other strategic centres seem to have been left out of this focus. Each strategic centre requires collaboration to achieve its nominated outcomes. Especially those centres with the potential for education/university growth such as Campbelltown-Macarthur. Further information on the nature of Collaboration Areas is required.

The framework for a new enterprise corridor linking Western Sydney and the south west could provide the future direction for employment, as well as linked to the M9 and outer Sydney orbital infrastructure corridor. This linkage seems to be missing from the plan, and are likely to have an impact on the south west.

C.5.6 EMPLOYMENT LANDS - SOUTHWEST

Freight is an important consideration in the south west. Further guidance is particularly needed about the changing nature and efficiencies or moving products needed, to guide land use and infrastructure planning, and the associated structure of the District..

Major part of Campbelltown and Wollondilly areas have historically been mine subsidence areas, as well as potential or actual areas for mining or mining licenses. The District Plan needs to provide a framework on mining and the coexistence of urban development and mining, if the housing and employment opportunities are to be realized. The Plan provides little vision or strategic direction for these councils, and associated land owners.

Coal Seam Gas (CSG) is also currently being trending downwards, however the economy may change in the far future as the region grows. The land use conflicts, like are being experienced in the Hunter, do not need to occur in this District if firm guidance is provided in the District Plan.

C.5.7 TRANSPORT AND OTHER INFRASTRUCTURE - SOUTHWEST

Importantly, the work by other agencies is progressing and in many respects advanced. A draft updated Structure Plan for the South West Priority Growth Area has been prepared (but not released). Proposals for the Western Sydney Employment Area (WSEA) are advanced, Sydney Water is progressing its sewer and potable water servicing strategies, Transport for NSW is working with the Federal Department of Infrastructure and Regional Development to identify future rail corridors; and Transport for NSW is also close to finalising the preferred corridor for the M9 Outer Orbital Motorway. There is also funding being dedicated to Northern Road or Appin Road, which will change the pattern, and provide improved road infrastructure for the region. The Maldon Dumbarton freight line is also progressing. However, these key infrastructure aspects are absent from the Plan.
Further for the District to accommodate the vision, improved bus networks and linked to passenger rail (eg SW Rail Link) should be provided in the Plan. These elements influence the shape and employment opportunities, and the associated housing provision.

A critical issue is the alignment and role of passenger rail connections linking South West and Central Sydney with Western Sydney Airport. An extension of the SW Rail Link between Leppington and the airport (by the time of opening) as well as south to Narrellan, should perform this role initially and support the growth of the SW growth sector and Western Sydney Employment Area. Over time there would be a role for high speed rail links to Parramatta and Sydney CBDs from the growing aerotropolis.

C.5.8 LIVEABILITY AND ENVIRONMENT - SOUTH WEST

The acknowledgment in this Part of the Plan of the need to preserve the visual quality and character of the Scenic Hills and the quality of water and open space value of South Creek and its catchment is supported. The challenge confronting the Plan is to balance the competing demands of the environmental biodiversity with urban development. The link or strategy with the new legislation on biodiversity should be considered as part of the green link, with the key areas which need to be retained identified upfront in the Plan, together with management and funding. If the scenic or biodiversity areas are not identified in a holistic manner, then councils, communities and developers plan on an ad hoc basis with little clarity of the important or key green corridors being identified in the District.

However, the land uses and activities of both environments do not need to be mutually exclusive. Innovative approaches to integrating both land uses are required. The District Plan should promote initiatives of better water management as part of the ‘blue web’.

C.5.9 METROPOLITAN RURAL AREAS - SOUTH WEST

Sydney’s three cities identifies where growth and development should occur. Identifying rural metropolitan areas (MRA) is important where the lifestyle can be retained, or for food security and agriculture. However, the MRA is not the appropriate tool to retain environmental areas; a new plan to provide significant biodiversity links should rather be developed to provide certainty to the direction.

The Green Grid and Metropolitan Rural Areas (MRA) should be clarified to explain the status and reason for MRA lands and specific green grid links, and why some agricultural areas (eg class), topography or biodiversity areas are identified. It would be more efficient to priorities the biodiversity areas which need ot be retained,

The MRA also needs to reconcile announced growth areas such as Greater Macarthur. It is not clear the extent to which the MRA is a de facto green belt.

C.6 DRAFT WEST DISTRICT PLAN

C.6.1 OVERVIEW WEST DISTRICT

- Penrith should be planned as a Regional City. More consideration should be given to role of Penrith as an existing city instead of allowing it to be undermined by an envisaged, but not yet well resolved WSA airport precinct.
• Place making attention and infrastructure investment should support the growth of the Penrith Health and Education Precinct.

• The South Creek Blue web waterway improvement initiatives are strongly supported – as well as green web and tree planting initiatives to manage heat effects.

• Penrith and the outer North West should be linked by orbital transit links with the south west District – via OSO and also transit links such as a northern extension of SWRL to WSA - Penrith -St Marys – Marsden Park – Rouse Hill.

• Penrith and WSA should ultimately also have high capacity faster rail connections with Central and Eastern Cities.

C.6.2 VISION AND NARRATIVE - WEST DISTRICT

The vision and narrative set by the Draft West District Plan is cognisant of the West District’s role on the edge of the Metropolitan Area and as an area with a comparatively small population and large proportion of open space, floodplain and bushland (including the Blue Mountains National Park and World Heritage Area).

The draft plan envisages growth in the district that is proportionate to the existing population and seeks to preserve the existing balance of population growth and open space. The West District Sydney contributes to the Western City envisaged by Towards Our Greater Sydney 2056 and the growth narrative for the district that is provided by the draft plan reflects this.

A key concern in relation to this plan is the apparent down-grading of Penrith as a regional centre. The focus of growth in the West District is shifted to the Western Sydney Airport, which, due to the location of LGA boundaries, is actually located within the South West District. This leaves the West District as a metropolitan district without a metropolitan focus.

The Plan should consider what will happen within this district if the envisaged airport does not eventuate, or is subject to significant delays. The existing centre of Penrith is present within the West district and this is under-supported by the current plan.

C.6.3 HOUSING - WEST

The Draft District Plan estimates the need for 41,500 new dwellings in the West District the next 20 years. The Draft District Plan acknowledges an imbalance in the supply of housing in western Sydney noting that while there is an increased need for all housing types in the West District, housing that can accommodate smaller households is in the greatest demand.

The draft plan therefore requires councils to facilitate a much greater level of housing to cater for the more diverse dwelling needs of the population over the next 20 years.

There is a significant imbalance between the housing stock and household structures. By 2036 there will be 50% more single person households. The current stock of housing is therefore not going to be suitable for the needs of households over the next twenty years. Not only will many residents be living in houses that are too large or not well designed for their life stage, the ability of new home buyers and renters to access affordable and well located housing will be compromised if the mix of housing types is not altered.
It is critical that more housing suited to smaller households and multi-family or extended family structures is provided, and that this housing is well located to access jobs, human services and other facilities.

C.6.4 SPECIFIC INFRASTRUCTURE NEEDS - WEST

The Draft District Plan emphasizes the importance of creating and integrated network of transport corridors to link centres and other key destinations in the Western City. The initial Western Sydney Rail Needs Study, released jointly by the NSW and Commonwealth Governments in 2016, presents multiple opportunities for passenger rail alignments connecting the Western Sydney Airport with the rest of the city. As a minimum, a rail connection linking the airport and economy of south and west Sydney via the South West Rail Link should be included and open by the commencement of the WSA operation.

Specific focus is given to maintaining an east-west rail link, however the draft plan could go further than this to recommend additional public transport requirements that will be required by the growing city. The draft plan focuses on east – west transport connections, more consideration should be given to augmenting these connections with meaningful north-south connections between south west and north west Sydney.

C.6.5 CENTRES, JOBS AND ECONOMIC DEVELOPMENT - WEST

A key concern in relation to this plan is the apparent down-grading of Penrith as a regional centre. The focus of growth in the West District is shifted to the Western Sydney Airport, which, due to the location of LGA boundaries, is actually located within the South West District. This leaves the West District as a metropolitan district without a metropolitan focus.

The Plan should consider what will happen within this district if the envisaged airport does not eventuate, or is subject to significant delays. The draft plan envisages that an additional 10,600 jobs will be created in Penrith over the next 20 years, and its role as a ‘health and education super-precinct’ (ie UWS and Nepean Hospital) will be key in the delivery of this growth. This seems to be a much better resolved plan for growth than that which currently surrounds the airport.

The Northern Road corridor is a significant link from the second airport to Penrith. This corridor is proposed to be upgraded, together with other significant future transit corridors, such as M12. Planning for employment and residential areas adjacent to these major corridors provides the framework and links into the south west ditrict and what occurs in the south west growth area. This linkage is missing form the Plan.

C.6.6 EMPLOYMENT LANDS - WEST

Job targets are supported however they require more guidance in the District Plan, as to the type of industries or submarkets. Guidance or frameworks for each council area is important to provide certainty to communities, landowners and developers. Current underdeveloped land trends may provide some guidance for future planning.

The Western Sydney Employment Area, Erskine Park and smaller industrial parks such as Dunheved remains a priority for freight and logistics, manufacturing and a range of urban services. These are important with or without a Western Sydney Airport. There is significant road and potentially rail investment (including consideration of a potential Western Intermodal) serving their freight connections.
Freight hubs and connections are critical for this District, and the OSO is part of the future plan and structure in this District. There is no clarity on how the OSO may impact this District and attract new industry associated with it. The M7 was a case where no formal planning was undertaken along its corridor, except for the Sydney employment lands, and thus future planning for the OSO should be on the forefront of the region.

C.6.7 TRANSPORT AND OTHER INFRASTRUCTURE - WEST

A critical issue is the alignment and role of passenger rail connections linking West and Central Sydney with Western Sydney Airport. An extension of the SW Rail Link should perform this role initially and link WSA with Leppington and thence Central and Eastern Sydney. Connections to the Penrith CBD and the NW sector (an interchange with NWRL via Marsden Park should be considered. Over time there would be a role for high speed rail links to Parramatta and Sydney CBDs from a growing aerotropolis.

C.6.8 LIVEABILITY AND ENVIRONMENT – WEST

The significant exposure to risks of flood and bushfire are a major constraint in the plan. Also significant is the threat of heat stress for a hostile summer climate – the hottest in Sydney. This requires additional attention to thermal comfort, tree planting and shade and excellent precinct and house design for the conditions.

The Blue Web concept of restoring and celebrating the landscape, vegetation and water environment of South Creek is strongly supported.

C.6.9 METROPOLITAN RURAL AREAS - WEST

The draft plan notes that the majority of the metropolitan rural land in the west district is either National Park, floodplain or used for low intensity uses such as grazing. The rural character is highly valued and the mountains and rivers and aboriginal heritage are recognised as World Heritage. There are high intensity agricultural uses in the floodplain including turf farms and poultry. The draft plan advocates for a design-led, rather than a criteria-led, approach to managing potentially conflicting land uses on Sydney’s western frontier.