



Australian
Institute of
Architects

District Plans

**Submission to the
Greater Sydney Commission**

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SUBMISSION BY

Australian Institute of Architects – NSW Chapter
ABN 72 000 023 012
Tusculum, 3 Manning Street
POTTS POINT NSW 2011
Telephone: 02 9246 4055
Facsimile: 02 9246 4030
Email: nsw@architecture.com.au

PURPOSE

This submission is made by the NSW Chapter of the Australian Institute of Architects (the Institute) to the Greater Sydney Commission in response to the Commission's draft district plans.

At the time of the submission the office bearers of the NSW Chapter are:

Andrew Nimmo (President), Shaun Carter (Immediate Past-President), Melonie Bayl-Smith, Callantha Brigham, Jacqui Connor, Sam Crawford, Steven Donaghey, Ashley Dunn, Monica Edwards, Tricia Helyar, Chris Jenkins, Peter Kemp, Alex Kibble, Phuong Le, Kathlyn Loseby, Howard Smith, Peter Smith, David Tickle.

The Executive Director of the NSW Chapter is Joshua Morrin. This paper was prepared by the Chapter's Built Environment Committee for Chapter Council.

INFORMATION

Who is making this submission?

- The Australian Institute of Architects (the Institute) is an independent voluntary subscription-based member organization with approximately 11,553 members who are bound by a Code of Conduct and disciplinary procedures.
- The Institute, incorporated in 1929, is one of the 96 member associations of the International Union of Architects (UIA) and is represented on the International Practice Commission.
- The Institute's New South Wales Chapter has 3,348 members, of which 1,951 are registrable architect members – representing 43% of all registered architects in NSW.

Where does the Institute rank as a professional association?

- At 11,553 members, the RIAA represents the largest group of non-engineer design professionals in Australia.
- Other related organisations by membership size include: The Design Institute of Australia (DIA) - 1,500 members; the Building Designers Association of Australia (BDAA) - 2,200 members; the Australian Institute of Landscape Architects (AILA) - 1,435 members; and the Australian Academy of Design (AAD) - 150 members.



District Plans

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INTRODUCTION

The Institute is very supportive of the Greater Sydney Commission and its value as a state government agency. Its focus on a design-led approach to placemaking is commendable. Towards a Greater Sydney 2056 will amend A Plan for Growing Sydney, the current Sydney Metropolitan Strategy. It will also link future regional plans to this over-arching plan. Together these strategies will set the future direction for our greater region, including the important centres of Newcastle and Wollongong as well as the Central Coast.

The Institute strongly supports this overall framework, which is essential to ensure that Sydney can properly function as a global metropolis that brings social and economic benefits equitably to its citizens. This together with an independent Greater Sydney Commission will bring unified metropolitan governance, in line with most global cities worldwide.

1. PLANNING FRAMEWORK

The real so called 'game changer' sits in the proposed amendments to the Greater Sydney Region Plan. Our Greater Sydney 2056 reshapes metropolitan Sydney into three parts, acknowledging the changing nature of jobs from manufacturing to services. The real change in thinking is the evidence-based on fine-grain economic analysis - revealing the pull of global finance to the central Sydney CBD, as well as the continuing growth of high value research and education jobs in clusters such as Westmead. A more complex paradigm of key centres, clusters, and corridors is emerging. The Institute strongly supports this evidence-based approach.

While maintaining Sydney's Centres policy, there is a fundamental shift with regards to the polycentric structure and hierarchy of our centres metropolitan centres, from a large number of strategic centres (formerly district centres), to three major agglomerations – the Eastern City focused on the Sydney CBD and global jobs, the Central City acknowledging Parramatta and Westmead Health Precinct as the most important job centre in the demographic heart of Sydney, and the Western City that will rely on the development of the Western Sydney Airport. This bold shift in thinking is long overdue and is strongly supported as there has been a growing dislocation between housing and jobs, both with regards to physical proximity and travel time.

This point is strongly brought home in the comprehensive data included in the background reports underpinning the draft district plans. While prior to deregulation the West District provided significant manufacturing jobs, currently a resident has access via public transport to only 3% of Sydney jobs within 30 minutes, while a resident of the Central District has access to 34% of Sydney's jobs.

The Institute supports the 'three cities' vision and its focus on high value 21st century jobs primarily in three core areas; the Sydney CBD, Parramatta City, and the proposed city focused around the new Western Sydney Airport, bringing more jobs closer to where people live.

The success of the plan will rely on the transport network that will be required to support the changing nature of centres and jobs. The Institute strongly supports the Western City Deal and believes that public rail infrastructure to Western Sydney Airport should be funded under that deal.

But both the district plans and A Plan for Growing Sydney should be much braver. There should be an inspirational plan that notes all the projects under consideration, even if they aren't funded or achievable on the next 20 years. There should be a visionary 100 year plan, a 'what if' Sydney or 'imagine Sydney' wish list.

The plans should foster a holistic approach for Sydney. More specifically the plans and the Commission itself should cut across the state government silos to create place based outcomes.

The Commission should embrace councils as their partners instead of simply informing them on outcomes. Collaboration is the key to success.

The state government needs to spread out the housing targets so they are truly located where there is the most amenity and access to employment. Targets in the beach suburbs and Woollahra, for example, are too low. All railway stations need retail and services around them to form urban activity hubs.

The step between the metropolitan strategy and the LEP is unclear, and the district plans don't have enough detail to fill the void. The Sydney 2030 plan should be used as a model for a district plan.

2. DISTRICT PLAN OVERVIEW

As noted above it is critical that the district plans support the amended metropolitan plan. The districts must not act as independent regions, but rather interdependent ones, linked more as a mosaic of places. For example, the key 'game changer' Western Sydney Airport sits within two districts, as do the 'string of pearls' centres straddling three districts that will depend on the airport to create high value jobs lacking in West and South Western Sydney, as well as other connections to housing.

The Institute believes more work needs to be done to integrate the plans in this regard. The draft district plans are too long, and include 'marketing' type material that should be removed. The draft review of 'Towards our Greater Sydney' should be up front in clearly setting out the challenges that lie ahead for Sydney and the strategy proposed to address them.

There should be more reliance on plans to explain principles clearly enough to inform Local Plans. The text should have hyperlinks to the relevant data in the background reports. While the data in the background reports is excellent, finding the relevant information relating to a particular principle in the district plan is difficult.

It is also assumed that the district plans will be further developed over 2017, integrating with the Transport Master Plan and Metro Strategy. While some may criticise the plans'

lack of detail, the Institute strongly applauds the Commission for consulting early with the broad Greater Sydney community.

The oppressive heat experienced in summer in the west should be specifically addressed. Perhaps the targets for tree canopy, shade on main streets etc. should be given priority in the hottest suburbs.

Each item in sections 3-5 should have tangible measurable targets for each priority. For example, sustainable priority 4: protect and enhance the urban canopy should state existing coverage, target coverage for 2020, 2025, 2030 and 2036. There should be actions for how each will be met. At each milestone the achieved coverage should be reported. Targets should always be linked to evidence.

Ten big moves for each district should be added to bring focus to the plans. Short, medium and long term targets should be added. Targets should adopt a 'quick wins' approach as well as the traditional short, medium, long.

The texts of the district plans contain many noble and supportable "shoulds": some issues are flagged for consultation, some for partnership action with agencies and local government, and there are requirements that there be clear public justification of constraints on development and standards located in LEPs. These are all reasonable and necessary approaches, however it is unclear where the determination of disagreements between agencies and levels of government might lie. This is one of the key problems that have dogged the implementation of previous metro plans. Answers to this question remain unclear and need further discussion and explanation.

The following governance issues should be addressed in the plans:

- An effective governance structure that provides for the delivery of the district plans. A governance diagram should be included. The governance structure should acknowledge the different priorities and agendas of government departments that guide the structure of the Sydney region
- It is not clear how a whole-of-government strategy from Premier to Cabinet and Ministers is structured
- A clear diagram of how decision making is made and by whom is critical. The respective roles of bodies like the Department of Planning and the Greater Sydney Commission are not spelt out. This also applies to the two arms of UrbanGrowth NSW.
- Where do mayors sit within the District Government structure? International benchmarks including the US and UK place city mayors at the centre of district planning. They are integral to the City Deals in the UK. How will the Western City Deal be implemented?
- The role in urban renewal of the various departments and agencies such as Health, Education, Land and Housing need to be clear. In many cases the very

understandable state-wide objectives and priorities of agencies do not align for optimum metropolitan city outcomes.

3. NORTHERN DISTRICT PLAN

The centre-by-centre analysis and strategies are clear and focus on the particular characteristics of each place. However, many centres and groups of centres are missing, for example the Military Road corridor.

Population growth targets for the Northern District should be more ambitious' especially along the transport corridors and at nodes.

Many parts of the north shore have large lot sizes and large houses. There needs to be a strategy to increase dwelling density within the existing frame, including granny flats and dual occupancies.

Design quality need to be an absolute focus of high density precincts. This principally relates urban design. The public domain needs to focus on the relationship between projects.

Zoning for jobs needs to recognize the importance of the value of residential development as a factor in development feasibility. Strategies such as that used by North Sydney Council, which upzones lands and allows higher residential yield upon condition of a minimum GFA of commercial development, is an effective way to deliver commercial. This applies to larger sites and sites with multiple or large frontages where the necessary space is available to deal with entries and servicing for mixed use development.

Explore strategies to support and facilitate work from home for self-employed and start-up businesses.

4. CENTRAL PLAN

District plans sit in the middle of a hierarchy of metropolitan, district and local planning for the Greater Sydney Region. Should the hierarchy also include the broader super regional area of Sydney, Wollongong, Newcastle and as far as Goulburn/Canberra? High speed rail links can make these areas and beyond plausible population and jobs growth areas. A metropolis of three cities plus... is this the role of the Greater Sydney Region Plan?

LEPs will continue to determine development permissibility; a draft District Plan or District Plan is not a mandatory matter for consideration in the determination of an application. Shouldn't it be mandatory? If not, why not? Does this apply to all consent authorities including Cabinet decisions, as was the case with the location of the Barangaroo casino?

The maps identify existing district and strategic centres. Should new strategic centres be identified as growth zones, e.g. Burwood or Bondi Junction?

The maps identify libraries in the district. Based on a desire to enhance liveability, it would be good to map additional cultural facilities such as theatres, galleries, clubs, music venues, community spaces etc. What is the sqm per person for cultural and sporting provision. We note that the retail rate is provided.

Existing policy setting challenges:

Critical support for the creative knowledge economy (and tourism) requires liveability incentives to overcome very strong competition from other cities; existing adverse policy settings with regard to housing affordability, transport and the moribund night economy need a coordinated fix. (Page 53)

Investigate opportunities to enhance the night time economy. Has there been engagement with community and City of Sydney proposals to diversify and enhance the night time economy?

The Institute supports agent of change planning principles to protect existing businesses and activities. The person or business responsible for the change is responsible for managing the impact of the change.

Transport:

Much is made of existing or committed transport infrastructure; what of future links such as expanded light rail, metro or high speed rail?

More extensive integrated east/west public transport links are a high priority for the Central District. Try getting out of Bondi to anywhere, or going from Potts Point to Newtown within an hour. It is good to see Action P6 on page 71, which seeks to identify opportunities to connect the south east area of the Central District. However, Action P7 on page 72 doesn't seem to support the need for the F6 corridor study.

Liveability:

The liveability framework is supported.

Similarly, flexible housing types including diversity, adaptability, affordability and more large family homes plus identifying needs on the housing continuum.

What is the mandatory framework for delivering the 20 year strategic housing supply targets with individual councils where strong local character objectives are in place.

What are individual councils' dwelling targets in terms of diversity and affordability?

Liveability Priority 8: Foster the creative arts and culture. Good to see support for the creative arts and culture (page 113), however there is no Priority or Action 'blue box' associated with this clause 4.7.2.

Design-led planning:

The aim is to provide high quality urban design; can this be leveraged to enhance existing poor quality built environments? Basic things such as poor quality of roads, footpaths and parks in many LGAs.

5. WEST AND SOUTH WEST DISTRICT PLANS

It is acknowledged that determining the nature of the third, or Western 'city' is a difficult but important one, and one that will need to be carefully considered over time. The economic drivers such as logistics, high value technology, and related industries will rely on a comprehensive transport educational and social infrastructure. An overarching strategy will be required before they can be translated into each of the three District Plans within the Western City sphere of influence.

While West Central includes Parramatta, it also contains Blacktown, one of the GSC 'string of pearls'. 'Airport City' precedents must be carefully examined. For example, Schipol 'Airport City' is less than 10 kilometres from Central Amsterdam. A strong evidence base will be required.

There are a number of lessons that can be learnt from and applied to the new Western City. For example, the overview notes the urban transformation of Sydney Olympic Park. While the excellent parklands have attracted strong residential development, a better connected rail link may have also attracted non-residential owners and tenants. The current spur rail line is not well connected to other key centres. The district action plans note improved transport connections – this will be critical to the success of the new Sydney paradigm.

Productivity:

The 'game changer' of Western Sydney Airport is strongly supported as it acknowledges the importance of transport hubs. World benchmarks also demonstrate that such hubs are only successful if supported by significant investment in:

- public transport
- educational facilities
- cultural facilities

While the district plan for South West Sydney notes its world class university, the reality is that Parramatta is quite rightly the focus of Western Sydney University. What is the strategy to develop an education hub in the South West? Will there be a strategic partnership with TAFE to develop high value jobs that complement the Western Sydney Airport hub?

The overview notes the importance of significant cultural institutions and facilities in attracting people to major centres, quoting the Sydney Opera House. Within the District Plans there doesn't appear to be strategy for cultural facilities planned &

committed to the new Western City. Overseas benchmarking by the Brookings Institution and others highlight the need for such facilities to attract high value jobs.

Liveability:

Built environment quality and, increasingly, transport accessibility, increasingly determines where high value companies choose to locate.

If the 'game changer' is to develop high value jobs in the Central and West Cities, this simply cannot happen without a 'game changer' with respect to built environment quality. The recent turn around in Detroit is in large part due to the very significant investment in the public domain, especially its three principal public parks.

An Effective Affordable Housing Strategy:

This is possibly Sydney's most difficult challenge for the coming decades. International experience shows that Federal and State involvement is essential. There is currently no whole of government approach to this issue.

International benchmarks of comparable global cities show that a 10% requirement is too low – New York's new zoning provisions are 20%- London is higher. New York has just removed the "20% if viable" by removing the density bonus for affordable housing and has just mandated 20%.

Sustainability:

The West and South West Districts experience more extreme weather and climate conditions. Measures that improve microclimate are strongly supported as is the incorporation of the Green Grid and the key priorities noted. This level of detail and clear priorities could be applied to all of the district plan actions as they are measurable.

Much of the housing environment in Western Sydney is not green. Wider streets with broader verges and substantial trees in the public domain would significantly improve the environment. This should be included in the both the District and Local Plans if the Parklands City is to become a reality and improve the lives of those living and working there.

6. CONCLUSION

While the challenges presented by the Commission's planning framework are significant, the district plans, if supported by a comprehensive and responsive transport master plan, and developed in sufficient detail to provide clear guidance for local plans, are a very good start and are strongly supported by the Institute.