



Australian  
Institute of  
Architects



Australian Institute of  
Landscape Architects

Draft Greater Sydney Region Plan  
and  
Draft District Plans

Joint submission to the Greater Sydney Commission  
by the Australian Institute of Architects  
and the Australian Institute of Landscape Architects

15 December 2017



## Overview

The Australian Institute of Architects and the Australian Institute of Landscape Architects (the Institutes) appreciate the opportunity to comment on the above documents (“The Plan”) on behalf of 11,000 members of AIA and 3000 members of AILA, around one third of which reside in NSW.

Liaison with the Greater Sydney Commission and other agencies during the consultation process has been extremely helpful in framing this response. During this period, the Institutes have as well as liaised with the NSW Planning Institute of Australia (PIA) who have made a separate submission. This collaboration represents a significant proportion of the of the combined built and natural environment professions of NSW.

We are extremely heartened with the introduction of this plan. The principle of producing it at all is to be commended and is at least as important as its content. We support the approach of its 20-year outlook and 40-year vision, and add that a robust bipartisan governance structure is essential if such a plan is to survive the election cycles.

Now that we have a Plan – and it is a good one – the key question turns to how we deliver it. What does success look like? How do we know when we have done well? How do we know when we are not doing well? Like any enterprise with a strategic plan, for it to be effective, it needs to be supported by certainty, predictability, and accountability, all of which we believe can be provided if there is set in place **metropolitan governance with the authority to deliver**.

To address these questions our response is structured as follows:

1. Metropolitan Governance
2. Draft Greater Sydney Region Plan
3. Draft District Plans

For each of the above, a concise series of recommendations are proposed. These can be incorporated by both the Greater Sydney Commission as well as Transport for New South Wales in their respective documents prior to finalisation. Wherever possible, recommendations are referenced to stated objectives, strategies or actions.

# 1. Metropolitan Governance

## 1.1 Implementation

*Objective 39: A collaborative approach to city planning*

*Action 13: Work with the NSW Department of Planning and Environment to develop its role in peer reviewing key land use infrastructure plans prepared by NSW Department of Planning and Environment to provide assurance to the community that robust planning is being undertaken across Greater Sydney consistent with the directions, priorities and objectives of the District and Region Plans.*

Consistent with previous submissions, the Institutes strongly support metropolitan level governance as being critical to the future of both Sydney and the broader metropolitan region. As we move from the strategic planning phase to implementation, this level of integrated planning and delivery will become even more critical and must continue.

Implementation constitutes only two of the forty objectives of the Plan. Whilst this is understandable for a Plan that is under development, now that we have a one, the question is which agency will be commissioned to deliver it? Whilst the objectives articulate principles which we wish to affirm, they are generally silent on the question of *who will deliver this Plan?*

International experience suggests that a strong and cohesive level of metropolitan governance is required to deliver and implement such a vision. The establishment of the Greater Sydney Commission is a very welcome initiative and we believe it will now be essential as part of the NSW Government's implementation of both the Greater Region and District Plans.

## Recommendations

- 1.1.1 Empower the Greater Sydney Commission to deliver Our Greater Sydney, conceivably as the 'Greater Sydney Authority'.** They should be commissioned to report directly to the Department of Premier and Cabinet. Equip the Greater Sydney Authority with legislative powers to identify and amend lower order statutory plans within the hierarchy of plans, such as LEP's, where they do not align or support the objectives of OGS, and to direct stronger collaboration between local government and State Government agencies for the purposes of achieving the objectives of the Plan.
- 1.1.2 Expand the role of the Greater Sydney Commission to include that of an ombudsman.** There is currently no obvious recourse for non-compliance with District Plans. With the complexity of agencies involved in the planning and delivery of Greater Sydney, there is a clear need for an independent and higher-order agency that has the capacity to direct in accordance with the principles of an established plan.
- 1.1.3 Charge the Greater Sydney Commission with the approval authority for Local Environmental Plans.** This power has been delegated back to the Department of Planning and Environment. We recommend that this power should be returned to the Greater Sydney

Commission to ensure the statutory controls properly align with the place-based strategic plans.

*Objective 40: Plans refined by monitoring and reporting*

In general, the Plan metrics (Table 6: Metrics to monitor the Plan) are broad. Whilst it is important that metrics are quantitative, they should also be qualitative.

*Action 14: Report on actions*

The Greater Sydney Commission is developing data collection methodologies across a number of metrics. This is being pursued with local government for consistency and to assist local governments to develop their plans. We strongly support this initiative so that meaningful targets may be set and proper feedback is possible. It is critical that this data is made publicly accessible so that it may inform good decisions more widely and gain community trust. This is international best practice in 'Just' Smart City Planning where the community is strongly engaged through Digital Master Plans. New York has had such plans since 2011, Barcelona since 2012, Hong Kong and Singapore since 2015.

## Recommendations

**1.1.4 Make Data and Metrics transparent.** Data and evidence that underpins and informs design and planning must be publicly accessible to promote community trust and engagement. Metrics must be explicit and detailed enough to be meaningfully monitored and assist in refining plans and policy over time.

**1.1.5 Measure quality of metrics as well as quantity.** The 'annual survey of community sentiment' could be a common measure for each of the 10 Directions.

**1.1.6 Apply continuous improvement.** Iteratively develop the plan in coordination with the development of key growth areas, for example the Western Sydney Airport. Provide frequent updates and releases no less than one year apart.

## 1.2 Integration with NSW Government Policy

*Comment*

The Plans in their current form make only passing reference to current and developing Government policies, in particular *Better Placed*, *Greener Places* (currently in draft), and *Beyond the Pavement*. The purpose and objectives of these policies carry across many elements of the Plans and are intrinsic to an integrated planning approach. They should be elevated in their status within the Plans.

The Plans should also be consistent with the principles established within these policies, each of which encourage and support an integrated approach to the design of the city.

## Recommendations

- 1.2.1 Call up NSW Government policies** (including *Better Placed*, *Greener Places*, and *Beyond the Pavement*) **in the Plan(s)**. The use of relevant instruments (or their replacements) should also be applied to local plans.
- 1.2.2 Change references to *Better Placed* from a ‘strategic’ design policy to an ‘integrated’ design policy for the Built Environment of New South Wales.**

### 1.3 Supporting local government

#### *Comment*

Working with local government and other agencies on collaboration areas is a key focus as this is clearly an implementation project in itself. We support this ongoing process of local/ state government collaboration.

A fundamental Greater Sydney Commission strategy is to set the framework, then allow local government agencies to develop their plans with Greater Sydney Commission support. Quality high level guidance for precinct planning is important.

This guidance needs however to be global as well as local, and local governments need to develop in-house place-based/ precinct scale design skills. Parramatta for example, (along with a number of other Councils) has employed a City Architect and has the skills needed. Not all local governments are in the same position. We recommend that local governments with strategic centres allocate sufficient funds to employ the resources needed to provide quality advice for their context(s), that is in line with the overarching framework of the Plan.

## Recommendations

- 1.3.1 Require City Architects and City Landscape Architects for each LGA covered by the Plan.**
- 1.3.2 Prepare a policy or guideline should be prepared for councils to guide urban renewal and development of urban centres.**

### 1.4 Communication

#### *Comment*

We know that the best way to ensure support for a plan that has involved this level of consultation is to continue to galvanise community support for its delivery. Unless the plan is owned by the community, it will struggle to succeed.

## Recommendation

- 1.4.1 Develop a strong ‘Communications with the Community’ plan, and the resources to put it into effect.**

## 2. Draft Greater Sydney Region Plan

### 2.1 A city for people

*Objective 6: Services and infrastructure meet communities' changing needs*

#### Recommendation

- 2.1.1 Deliver enhanced community infrastructure in areas of intensification.** Affordable housing, schools, community facilities and open space should be delivered as part of proposed up-zonings.

### 2.2 A city of great places

*Objective 12: Great places that bring people together*

*Strategy 12.1: Deliver great places by:  
[...]*

The delivery of a city of great places requires a coherent, collective and integrated approach, not a series of projects-by-agency. Binding it all together at the level of tangibility is what we know as urban design.

To this end we note that there are no real guidelines or guidance in the documents that identify and require urban design quality. It seems assumed that local government will develop these. Whilst this is important so that there is no one-size-fits-all approach to urban design within Greater Sydney, it is important that local governments are supported, and that there are consistent principles in place to help the constituent districts of the city to hang together.

#### Recommendations

- 2.2.1 Deliver design excellence in place making, specifically at the Precinct and Town Centre Scale.** Continue to support Parramatta, improve existing Liverpool, Penrith, Blacktown and Campbelltown centres, and over time, develop new town centres as part of the South Creek Corridor, connected by public transport to Badgerys Creek.
- 2.2.2 Provide technical support for place-based planning.** Develop policy tools and programs to support place making, including urban centres design guidelines (similar to the Apartment Design Guide), assistance to local government with formulation of scope of structure plans and town centre master plans.
- 2.2.3 Reference directly Better Placed, Greener Places, and Beyond the Pavement.** (Refer 1.2.1 above)

*Objective 13: Environmental heritage is conserved and enhanced*

We understand that the only protection for heritage items is through current LEPs, and that the Greater Sydney Commission has no authority in this area. This is a significant issue as heritage fabric is fundamental to preserving culture and the significance of places, including desirable, diverse centres that attract jobs.

## Recommendation

- 2.2.4** Introduce stronger mechanisms for the protection of heritage items within the area covered by the Plan.

### 2.3 A well connected city

*Objective 14: A metropolis of three cities – integrated land use and transport creates walkable and 30-minute cities*

*Strategy 14.1: Integrate land use and transport plans to deliver the 30-minute city*

*Strategy 14.2: Investigate, plan and protect future transport and infrastructure corridors*

The vision of a ‘half hour’ city, where all citizens enjoy a similar journey to work and other places, is strongly supported by the Institutes, as it addresses social, economic, and environmental equity, and promises a comprehensive and explicit approach to sustainability. The specific targets of improving the percentage of those within 30 minutes from a metropolitan centre from 39%, to 64% by 2036, and 71% by 2056, are also strongly supported.

Such a city cannot however be achieved without *significantly improved* transport. The simultaneously released Draft Transport Strategy provides such an opportunity if mass transit as a form of travelling to work is prioritised over the private vehicle. The task of moving freight, trades and emergency services is a separate aspect to transport that needs to address the form and function of the city also. We need a transport transformation, and not just in the form of a strategy, but a fundamental commitment to the investment required to move people and goods and services around the city in a way that contributes to its liveability and productivity.

## Recommendations

- 2.3.1** **Prioritise transport infrastructure and provide financial commitment to deliver it.** Public transport funding and delivery should be brought forward as necessary.

- 2.3.2** **The future transport strategy (*Future Transport 2056*) should action a reimagined ‘Traffic Committee’ as a ‘Place Committee’.** The existing committee should be dissolved or reworked with the transport hierarchy (pedestrians, cyclists, public transport, delivery vehicles, taxis, private vehicles) mandated in their purpose with the quorum held by public transport, walking and cyclist representatives.

*Objective 17: Regional transport is integrated with land use*

## Recommendation

- 2.3.3** **Develop a Regional Metropolitan Structure.** Strongly integrate OGS with the Hunter and Illawarra by high speed rail links to create a Greater Metropolitan Region similar to international best practice.

## 2.4 Jobs and skills for the city

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

### Recommendation

**2.4.1 Establish a Western Sydney Airport Development Corporation**, or similar, to oversee the development of this new precinct.

## 2.5 A city in its landscape

*Objective 26: A cool and green parkland city in the South Creek corridor*

*Action 11: Develop and implement the South Creek Corridor Plan*

### Recommendation

How does the South Creek Area mesh with the Parkland City structure? This important initiative should be upfront in the structure plan, as with the Nepean River and Western Sydney Parklands, it will largely shape the image and identity of this place.

**2.5.1 Include South Creek urban design principles in the District Plans, Local Plans and DCP's as well as state government plans.**

*Objective 30: Urban tree canopy cover is increased*

*Strategy 30.1: Expand urban tree canopy in the public realm*

### Recommendations

The tree canopy is an excellent strategy and is strongly supported by the Institutes. This must be understood however as a collective responsibility, in which the public domain is the lead partner to plantings in private yards.

**2.5.2 Include a statement supporting the use of native species from the locality or region in all development**, unless the objectives of the project or design require alternative species.

**2.5.3 Include a statement in the Plan that requires all development adjoining or incorporating a road or street or car park to include the provision of shade trees in the developed area.** This will have far reaching effects on liveability and the cooling of our urban areas.

*Objective 32: The Green Grid links parks, open spaces, bushland and walking and cycling paths*

The Institutes support the concept of the Green Grid. The Marrickville Greenway is an excellent example of a joint public and community initiative. The Rouse Hill Regional Park expansion is also an excellent example of considering the future and the need for large scale open space. A statement supporting this extension should be made in the Plan.

We support the Plan's initiative to ensure that riparian corridors are kept in public ownership. This is currently not the case in

significant growth areas including the Growth Centres where there is insufficient funding, which raises the question – who is now funding acquisition and maintenance? Local governments do not have the funds.

## Recommendations

- 2.5.4 Implement the Green Grid with quality public open space that is of high usability, and strategically located near growth centres.** Green linkages are not enough to create liveable environments.
- 2.5.5 Include in forward financial planning must include provision for maintenance of the green spaces that form part of the Green Grid.**
- 2.5.6 Reference directly Greener Places.** (Refer 1.2.1 above)

## 2.6 A resilient city

*Objective 38: Heatwaves and extreme heat are managed*

### Recommendation

- 2.6.1 Reference and draw upon the research of ‘Cooling Western Sydney’,\*** which notes that *‘while greenery does have a cooling effect, the study shows the most effective urban heat technologies use a combination of water-based technologies including fountains in conjunction with cool material technologies such as cool roofs and pavements’.* (\* *Cooling Western Sydney*. A strategic study on the role of water in mitigating urban heat in Western Sydney. © Sydney Water Corporation 2017. Reference from p.3)

### 3. Draft District Plans

#### 3.1 A city of great places

*Planning Priorities E6, C6 [...]:  
Creating and renewing great  
places and local centres, and  
respecting the District's  
heritage*

Place based precinct planning is essential to create centres and places that attract people and jobs. A high level of urban design must create the framework to achieve good density. The lack of high quality places and centres in Western Sydney must be addressed if the jobs and other services required for the 30 Minute City are to be achieved.

The following recommendations can be incorporated into the District Plans.

#### Recommendations

**3.1.1 Include the seven objectives of *Better Placed*, the NSW Government's integrated design policy, in the District Plans, together with a requirement that all Local Plans address each objective:**

- Better Fit - built form that responds to context and integrates with place
- Better Performance – development that is sustainable
- Better for Community – diverse and inclusive developments
- Better for People – a public and private domain that is liveable
- Better Working – develop buildings and spaces that can adapt to rapid change
- Better Value – Value for the community
- Better look and feel – Built design quality

**3.1.2 Require place-based precinct plans in all strategic and major centres.** The Greater Sydney Commission should collaborate with the local council and relevant agencies to develop these precinct plans.

**3.1.3 Do not approve up-zonings within strategic and major centres prior to the completion of precinct plans.**

**3.1.4 Require precinct plans to forward plan so that agency initiatives such as light rail, schools, health facilities, etc. are properly integrated before they become 'agency projects' where changes cannot in reality be made.**

**3.1.5 Ensure each local government area has sufficient urban design expertise.** The Greater Sydney Commission or another body should provide additional resources where this is lacking (refer 1.3.2 above).

**3.1.6 Require the appointment of a City Architect and/or City Landscape Architect in all LGA's that include strategic and/ or local centres** (refer 1.3.1 above).

- 3.1.7 Support the engagement of registered architects and landscape architects as well as planners in the translation of the Plan into LEPS and state policies.**
- 3.1.8 Subject all precinct scaled plans including Collaboration Areas and Priority Precincts to public participation.** The community must be effectively involved in the conversation.
- 3.1.9 Include in precinct plans the improvement of amenity to accompany urban intensification – bigger and better, not just bigger and bigger.** Precinct plans should include consideration of:
  - Mass transit
  - Walkability – small fine grain blocks
  - Social infrastructure – schools, health, community facilities
  - Green open space and recreation facilities
  - Built form in scale with the public realm including the street
  - Built form design excellence

## 3.2 Housing the City

*Planning Priorities E5, C5 [...]:  
Providing housing supply,  
choice and affordability with  
access to jobs and services*

Reference: Density Done Well - SEPP 65 – The Apartment Design Guide (ADG)

The ADG is intended to guide the improvement of residential apartment development. ADG Section 2D: Floor Space Ratio recommends a net density of approximately 3:1 for urban blocks in the order of 9 – 12 storeys – net densities beyond this tend to be high-rise tower dominated and can create poor urban environments, lacking sun and pedestrian amenity. Such environments are not generally liked by the community and create significant concern and increasingly protest.

The Institutes believe that greater height requires rigorous masterplanning and significant and special amenity offer to offset the negative impacts of towers. Special high-density centres like Broadway/ Railway Square illustrate how this can be achieved. However, there are many current examples across Greater Sydney where integrated design and place based planning has been ignored. Generally, a street scale urban form where towers do not dominate can achieve the densities required while creating the high-quality environments the community expects.

## Recommendations

### 3.2.1 Incorporate the following key elements of the Apartment Design Guide into planning for centres:

- Appropriate response to context and place
- Integrate the site with its precinct
- Integrate the development with the public domain and street scale
- Design for building amenity
- Design excellence processes

We thank the Greater Sydney Commission for their work, and for the opportunity to provide these comments on the Plan.

Yours faithfully



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## **SUBMISSION BY**

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## **PURPOSE**

This joint submission is made by the NSW Chapter of the Australian Institute of Architects and the Australian Institute of Landscape Architects to the Greater Sydney Commission in response to the Draft Greater Sydney Region Plan and Draft District Plans.

At the time of the submission the office bearers of the NSW Chapter (Australian Institute of Architects) are: Andrew Nimmo (President), Shaun Carter (Immediate Past-President), Sarah Aldridge, Callantha Brigham, Jacqui Connor, Sam Crawford, Steven Donaghey, Ashley Dunn, Monica Edwards, Peter Kemp, Alex Kibble, Phuong Le, Kathlyn Loseby, Joseph O’Meara, Howard Smith, Peter Smith, Michael Tawa.

The Executive Director for the NSW Chapter is Joshua Morrin. This submission was prepared by members of the Chapter’s Built Environment Committee (Andrew Nimmo, Paul Walter, Philip Graus, Paul Berkemeier, Valeria Giammarco, Julie Lee, Gareth Collins, Dianne Griffiths) and Joshua Morrin for the NSW Chapter Council.

## **INFORMATION**

Who is making this submission?

- The Australian Institute of Architects (the Institute) is an independent voluntary subscription-based member organization with more than 11,000 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 more than 3,000 members
- The Australian Institute of Landscape Architects (AILA) champions quality design for public open spaces, stronger communities and greater environmental stewardship.
- AILA represents 3,000 members throughout Australia and overseas, approximately one third of whom are based in NSW
- As a not-for-profit professional association, our role is to serve the mutual interests of our members and the wider profession.

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