



29 October 2022

Ms Elizabeth Mildwater  
Chief Executive Officer  
Greater Cities Commission  
14 Valentine Street  
PARRAMATTA 2150

Dear Ms Mildwater

**Re: Six Cities Region Plan Discussion Paper**

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of twelve local and municipal councils in the area south of Sydney harbour. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. The SSROC area covers central, inner west, eastern and southern Sydney, an area with a population of over 1.8 million and contributes much of Sydney's gross domestic product.

The SSROC Secretariat appreciates that the Greater Cities Commission (GCC) has called for comments on the Six Cities Region Plan Discussion Paper.

**GENERAL COMMENTS**

SSROC welcomes the opportunity to contribute comments on GCC Six Cities Region Discussion Paper.

SSROC member councils welcome the concept of the six region shapers – First Nation voice, a connected region, housing, inclusive places, jobs and economics and green cities. The challenge is in the details – the key elements of each of the shapers and how to work collaboratively with councils and other key stakeholders to live good outcomes for the communities of each city.

How the three cities in the Sydney region connect with each other and with the three other cities is not clear. The Six Cities Region Plan can distil the uniqueness of each city and how the cities complement each other.

While SSROC supports some key aspects of the Six Cities Region Plan, there are some concerns. Suggestions to consider for improvement of the plan are in the "Specific Comments" section below. We will welcome an opportunity to explore these in further details.

**SPECIFIC COMMENTS**

**1. Collaboration and integration**

The developing and implementation of the Six Cities Region provides a key opportunity for collaboration and integration between councils and state agencies. There is need for the plan to make a stronger statement on this. There is the potential for councils to establish new genuine collaborative partnerships with state agencies this could become the new modus operandi under the Six Cities Region and City plans, informed and empowered by

funded state strategic infrastructure plans. The scale and the scope of the expected change across the Six Cities will require some decentralised decision-making by Government and the GCC, once overall strategic alignments are settled. These 'decentralised' partnerships should articulate:

- strategic outcomes
- who are the main partners (with council)
- which party leads on which aspects of the growth planning and delivery
- funding commitments to underpin the infrastructure logistics and delegated authorisation of agency decisions supporting the partnership.

There is need for State government commitment to communication collaboration and engagement with councils for the preparation of the draft plans and the setting of housing targets. Partnership with council is preferable to imposition of a State Agency led redevelopment model for achieving place-based growth around metro stations. Better outcomes will be achieved when there is an alignment of transport, employment and housing goals and targets.

Expectations for producing draft City plans in early 2023 may jeopardise operationalising this collaborative approach.

## **2. Approach for Region and City Plan preparation**

- SSROC believes that big decision on our spatial economy and decisions that will affect the community profoundly needs to be preceded by planning scenarios to better articulate and anticipate alternative futures based on infrastructure investments.
- The Plan can offer partnership models where councils lead placemaking in collaboration with key state agency partners around transit growth centres that can successfully streamline decision-making. This could prevent a plethora of state led developments or private proponent led Planning Proposals.
- Judicious use of Collaboration Areas and intense coordination to resolve complex planning challenges.

## **3. How the Six Cities connect**

The Six Cities Region concept seems innovative and promising for regional integration. However, it is not clear in the Discussion Paper how the centres and jobs growth and employment lands and health and education hubs all work together, especially with the adjacent cities. The City plans should include more detail about plans for future clustering of economic development and new jobs.

Articulating the value proposition of the Six Cities coming together, as a global destination, so that they become an attractive place for international investment and strategic growth. This proposition would describe what each part/place/city will contribute and the role it can play in supporting this outcome, so that whole becomes greater than the separate parts.

## **4. Recognise and promote the uniqueness and specific character of the Six Cities**

Uniqueness of the cities can be of different dimensions that describe the economic, social, and physical and cultural geography of place and Country including:

- Jobs and economic engines
- Population growth and demographic changes

- Physical environment (blue and green grid, urban forests)
- Housing
- Infrastructure and services
- The cultural heart of each city
- Liveability, vitality and place making.

Current Discussion Paper descriptions of Six Cities Region are too generic, homogenous and bland.

Unpacking the uniqueness can be described and supported by data. This deep data knowledge needs to be shared with local councils.

## 5. Growth Targets

- The proposed new growth targets are informed by Local Strategy Planning Statements (LSPS) and Local Housing Strategies (LHS). To the extent that growth targets are informed by LSPS, councils are likely to relate to them.
- There seems to be focus of increased density near metro and rail stations. This raises the concern for diminishing liveability if increased density is not matched by commensurate increase in community infrastructure and amenities. It is also worth considering the impact of the pandemic, drop in migration and community reluctance to some planned growth on growth targets in the Eastern Harbour City. There may be need for State sponsored community education campaign to put the case for more growth and assure communities of the benefits. This assurance would need to be matched with more liveability related infrastructure to match the growth.
- The Plan should prioritise provision of more affordable housing (higher targets), as an integral part of growing the housing supply.
- Targets for health and education need to be better emphasised and unpacked more.

## 6. Climate Resilience

- There is need for increased focus on environmental condition and management of Sydney Harbour and its foreshores as a strategic priority (previously we had the Harbour REP and attempts to translate this into the Environment SEPP).
- Foreshore and catchment management of key waterways - prioritise.
- Regional approach to waste management, water and energy use, and the circular economy needs to be enabled and supported by the Six Cities Regional Plan.

## 7. Infrastructure Planning – Use of scenarios

- The Plan should place some emphasis on scenarios as a tool for exploring different growth possibilities created by different levels of infrastructure investment to understand the impacts that are contingent on public investment.
- Councils will have more clarity if the Plan is specific on major state-led developments, transport strategies, health and education infrastructure
- As land get more scarce in the Eastern Harbour City, there is need for scenario planning stimulations that can inform strategy to develop greater capacity be it for education, health of placed based and place-making infrastructure.

## 8. New developments around metro and train stations – case for a new model

The GCC Discussion Paper proposes a 25 per cent target for higher density development within 800 metres of transport hubs. There is a coalescing of advice from the Australian

Productivity Commission, GCC and DPE, and peak bodies like Committee for Sydney, and the development industry peaks that all call for allowing more dense development around key transport corridors and centres and changing zoning rules. Councils understand this and are keen on where, when, and how council will be involved in the growth and change model.

Councils are in good position to knit the whole plan balancing resident and business needs at the same time valuing the distinctive local character while negotiating the needs and timing of state agencies once there is a government commitment to this process.

Councils are well placed and can be entrusted responsibility for leading undertake high quality placemaking around transit centres and hubs such as around new metro stations.

There is no need for contests over council led centre growth strategies versus Government agency led models. The Six Cities Region Plan and City Plans offer opportunity to embed and demonstrate council led or collaborative hybrid of council /State agency led precinct growth partnership model. This will lead to better community outcomes rather than singular State government development corporations or private proponent led Planning Proposals.

## 9. City Plans should build on current District Plans

The planning directors of SSROC member councils held a workshop on the Discussion.

Paper and identified what has worked well and what did not work well. The GCC should consider these and find ways to build on the successes and re-articulate the concepts of the approach to implementation of not so successful urban and planning strategies in preparing the proposed Six Cities Region Plan and City Plans.

### ***What worked well***

- Long-term community supported integrated planning of land uses and transport inform the LSPSs driven by local councils with support from State government agencies.
- The Blue and Green grids, with 'wins' on urban greening.
- Clear hierarchy of designation of centres.
- Prioritisation of certain land uses such as industrial and employment lands and avoid crowding out by residential uses.
- A growing appreciation of designing for Country.
- Guidance on open space requirements.
- Strategic alignment between LSPS and District Plans.
- Better recognition of the role boarding houses and co-living's strategic and contributions to housing diversity (a contribution to more than short-term accommodation).

### ***What has not worked well***

- Social housing has been declining as a proportion of housing in a growing population. The target of 30% social housing cap (used in Communities Plus developments) should not apply to existing Land and Housing Cooperation (LAHC) land. No numerical housing targets for affordable housing. There is a need to re-think the 30 social 70 private housing renewal model.
- Recognise boarding houses, student accommodation as affordable housing typologies.
- Remove affordable housing target restrictions on public lands. This need to be reconsidered through planning policy review informed by a collaborative modelling exercise or evidence.

- Flood planning recommendations need to be better integrated to achieved desired results.
- Health and education hubs need to be better picked up in the in the new plan.
- Housing target should reflect both housing choice and diversity. Both are important. Details should not be lost in motherhood statements.
- Loss of housing diversity in some market driven developments, with some demographics being underserved as a consequence. Need for better targeting of policy to address this.
- Successes achieved in scale of tree canopy, despite increased development pressure.
- Growth Infrastructure Compacts was a great planning concept to ensure infrastructure matches growth and leverages on collaboration of government agencies, council and other stakeholders, but not followed through.

## 10. Opportunities for Six City Region / City Plan

The proposed Six Cities Region Plan and City Plans hold opportunities for places, communities and council areas if done well. Based on SSROC member councils' workshop, the items below should be given priority considerations by GCC. They include:

### ***Mechanisms***

- Improve mechanisms, including financing modules, for affordable housing – more emphasis on “how” rather than just setting targets.
- Adoption of best practice for larger sites that include transport hubs (e.g., the adoption of a more targeted version of the Urban Design Guide) and incorporating dependencies on transport infrastructure investment and its scheduling.
- Promotion of a resilience and sustainability approach that accelerates the race to net zero and the wider adoption of renewal energy across the system. Establish outcomes /performance for climate change, environment and sustainability.
- Set in place arrangements to deliver diverse and affordable housing, where there is zoning uplift and utilising new financing mechanisms (Rec 3.6, p47) and starting with numerical affordable housing targets.
- Setting out an economic development agenda for the Cities expressed as a spatial strategy.

### ***Affordable Housing***

The Six Cities Region Plan needs to provide direction on ways and strategy needs to assist local and state governments to better manage the market speculation of land triggered by state announcement of growth plans. The direction or guide will enable them to navigate options on potential sites and transit corridors, including purchasing or allocating such sites based on demographic needs ahead of Ministerial announcements.

The Six Cities Region Plan should enable councils to establish affordable housing contribution schemes (AHCS) that can apply to future uplift. SSROC in collaboration with Resilient Sydney and with the support of regional organisation of councils in Sydney and the Department of Planning and Environment are developing AHCS module that would be implementable by councils. SSROC will welcome the opportunity to discuss this with GCC.

Support for a larger and more concerted affordable housing response is required to provide key and essential worker housing to both support and create more inclusive and productive communities. Contributions to growing affordable housing are needed on both rezoned private and government owned land.

Affordable rental housing will need to be an integral part of the urban renewal to help counteract the major loss of lower priced rental and the displacement of residents who are existing renters.

### **Growth Infrastructure Compact**

Capture and apply the benefits of growth infrastructure compacts and lessons learnt from Greater Parramatta and Olympic Park planning initiative (of sequencing development growth and infrastructure deployment).

### **Other**

- Identify and reserve strategic lands for fast rail corridors linking the Sydney, Newcastle and Central Coast as a game-changer.
- Planning for future liveability outcomes as part of growth planning and analysis.
- Setting Regional/City targets for environmental performance.
- Build the capacity of key Aboriginal organisations to lead the designing for Country process by enabling planning staff for the organisations.
- Consolidate on existing strategic directions in comprehensive LEPs that remain appropriate and in accordance with previous community consultations and council commitments.
- Identify the distinctive cultural heart of each of the Cities and reinforce this vitality and liveability.
- Develop a nimbler approach to strategic planning of each of the Cities.

## **11. Priority directions for the GCC City Plans' development**

SSROC member countries' planning directors identified some key priority directions that can guide the development of City Plan developments.

- Improve liveability for existing and new residents as growth inevitably transforms and changes places and communities (see more details in the "Liveability" session below).
- The Draft City plans should be strongly evidence based. The underlying data needs to be shared early on with councils in the plan preparation stage. Baseline data and tracking progress against it should be shared transparently with councils if City objectives are to be owned and delivered by councils.
- A long-term vision and drivers of economic development of each of the cities. A sensitive and responsive approach to the use of industrial lands and not displace economic uses and industries (and their jobs) by residential accommodation for short term financial gain of developers.
- A long-term vision for improved environmental performance of all the parts of the cities. The articulation of regional initiatives that move communities closer to achieving net zero. A state of the environment dashboard could help capture the dynamism of this area.
- Ensure the Cities plans adequately reflect and incorporate the strategic planning outcomes described in local councils' *Local Strategic Planning Statements* by testing

this with councils and identifying any points of conflict that require community consultation and adaption by the GCC and Councils.

- Greater articulation of the Connectivity: transport, economic and workforce connections between the cities and how the cities work together. For SSROC, this will have a focus on the Eastern Harbour and Central River cities, including improved transport accessibility to Parramatta from Canterbury Bankstown, Georges River and Sutherland and the Parramatta Road corridor.
- GCC needs to articulate the value proposition of a global conglomeration that comes from the 6 Cities. Complementing this information would be a better articulation of what each City brings to the conglomerate, its role and strengths and community assets and contribution to what the region has to offer. The plans should show how the geographic growth in employment and housing are intended to work together.
- Clear articulation of the temporal alignments of large government Infrastructure commitments across agencies (schools, transport, health etc) and the process for government coordination and engagement with councils when commitments are yet to be made. The plans should hold state agencies to account.
- Clearly articulating that the 'legislated' market driven housing targets included in the City plans are targets and councils do not build housing but create the capacity for residential development. Factors like interest rates for borrowers, migration levels and the health of the economy and developer land banking are outside local council control. Any dictated housing targets need to be tested and negotiated with councils and be consistent with their approved LSPSs.

## 12. Liveability

Compared to Greater Sydney Region Plan, the six shapers for the Six Cities Region Plan did not specifically identify liveability as a key focus stream. None the less, the new proposed plan should consolidate the District Plan's recognition of liveability as a key element. The concept of liveability that SSROC advocates refers to the well-being of a community. It is the sum of the aspects that add up to the quality of life of a place, including its economy, amenity, environmental sustainability, health and wellbeing, equity, education and learning, and leadership. It is well aligned with the 30-minute city concept.

The concept of liveability and specific mechanisms to embed it were not followed through in the District Plans. The expectation is that the Six Cities Region Plan and City Plans take the concept liveability further by embedding it in the mechanisms for implementing and monitoring outcomes. Apart from consolidating and improving liveability for locals, cities like Sydney compete for knowledge jobs and investment with international destinations such as London, Singapore and New York, and liveability is one of the factors for a city's competitiveness.

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SSROC developed in 2017, *Liveability Indicators and Mapping* that has an interactive geographical information system (GIS) platform to model access to facilities such as open space, shopping centres, health facilities and rail stations. The mapping tool illustrated the SSROC areas' accessibility to key social infrastructure and shows differences in liveability in the area and enable 'pressure testing' of urban growth scenarios, renewal corridors and precincts in Central and South Districts.

The new plans can benefit from consideration of SSROC member councils' concept of benchmarks and indicators of liveability, liveability deficits and infrastructure gaps. SSROC is looking to update this concept and platform and will welcome the collaboration of GCC and possibly Resilient Sydney, in this project that can inform strategy infrastructure priority for the Six Cities Region.

An articulated measurement model of liveability as an assessment tool can inform plan making and investment decisions. This will demonstrate that the chosen plans for growth are based on sound evidence about improving the quality of places and residents' wellbeing and lifestyles as well as responding to spatial equity considerations.

### 13. Climate Resilience

- There is need for increased focus on environmental condition and management of Sydney Harbour and its foreshores as a strategic priority (previously we had the Harbour REP and attempts to translate this into the Environment SEPP).
- Foreshore and catchment management of key waterways - prioritise.
- Regional approach to waste management, water and energy use, and the circular economy needs to be enabled and supported by the Six Cities Regional Plan.

### 14. South District contribution seemingly forgotten

There is a concern that the Discussion Paper seems to have omitted much of what were key strategies and opportunities in the South District Plan, including collaboration and innovation areas (see page 25 of the Paper: the Bankstown Aerotropolis, new Metro line (SE Transport Strategy). This should be reconsidered.

### 15. Place-Making

The Plan should place priority on retaining and enhancing the distinctive quality of places within the City plans and recognise the primacy of councils' role in place-making.

### Conclusion

Thank you for the opportunity to make a submission on Six Cities Region Plan Discussion Paper. SSROC member councils will welcome opportunities and collaboration and integration in the development and implementation of the plans for better outcomes for councils, businesses and community.

In order to make this submission within the timeframe for receiving comments, it has not been possible for it to be formally reviewed by councils or to be endorsed by the SSROC. I will contact you further if any issues arise as it is reviewed. If you have any queries, please do not hesitate to contact me or Vincent Ogu, SSROC Program Manager on 8396 3801.

Yours sincerely



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**Southern Sydney Regional Organisation of Councils**