

Draft Greater Sydney Region Plan

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Sydney Metro West Submission A 10,000 Friends of Greater Sydney (FROGS) Response

12 December 2017

(The discussion below is structured by Objective, as listed in GSC's preferred submission template)

Objectives 1 & 14: Infrastructure supports the three cities; A metropolis of three cities – integrated land use and transport creates walkable and 30 minute-cities; and, Objectives 15, 18-19: The Eastern, GOP and Western Economic Corridors are better connected and more competitive; Harbour CBD is stronger and more competitive; Greater Parramatta is stronger and better connected ;

FROGS endorses the concepts of the Eastern Harbour City and Central River City.

Actions which should be accelerated and intensified are:

- The concept of GOP. FROGS agrees with the direction of current and future initiatives to fully realise the potential of GOP's unique positioning in the geographic centroid of the Greater Sydney Region.
- Housing and employment land uses within the GOP area. The scale of housing and employment should be commensurate with GOP's role as the geographic centroid of Greater Sydney.
- FROGS endorses the relocation of more State-level judicial/legal, police, sporting, educational, health, executive, cultural, tourism and transport institutions into the GOP area at the fastest practical schedule possible.

Concepts/actions to put on hold, pending viability and cost:benefit analysis are:

- Western Parkland City concept needs to be carefully studied, as it's viability is merely assumed and hasn't been established yet (see below on FROGS “counter-scenarios”).
- The viability of Western Parkland City needs to be established before any large scale infrastructure is sequenced. However, preserving corridors and “seed” investments in corridor acquisition (in the immediate/short term) may reduce the long term cost of any eventual infrastructure program.
- FROGS does believe one Western Sydney rail line is appropriate (eg. connecting to Central City), but believes there will be diminishing returns in additional airport rail lines connecting smaller centres (most of the “airport” rail patronage is likely to be commuter patronage into Central City or Harbour City - see scenarios below)
- Even GSC itself seems to acknowledge their plan isn't really a plan for Three Cities, but in reality Two Cities plus four metropolitan “clusters”.

Recommendations

- Review the location for the 3rd city within the 3 cities concept.
- Review transport connections to Western Sydney particularly rail to better align with selected 3rd city
- Plan transport network for 50-60 years hence, especially rail and priorities based on forecast demand and cost effectiveness in supply

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

FROGS can understand that the following scenario (on the surface) sounds attractive: “In the Western City, improving liveability is about new great places, with well-connected communities which have access to a range of jobs and services... The timely delivery of infrastructure to support new communities to develop social connections will bring vibrancy and activation and improve liveability.”

However it is suggested that a risk analysis could cover the following scenarios for Western City(not that FROGS envisages anything like that happening) :

Risk Factor 1: Campbelltown Mk II, built at cost of \$50billion+

* NSW spends \$50 billion on four rail lines connecting Western City north to Marsden Park, south to Narellan & Campbelltown and east to Parramatta and Glenfield.

* The new airport supports some new jobs, but not as much as originally envisaged due to technology/productivity improvements in customs/immigration, baggage handling, and freight/logistics. Also, the airport's primary customers are budget airlines who have greater price sensitivity and less intensive labour requirements than full service airlines. Many of the jobs that do eventuate in the Aerotropolis are diverted from other Western Sydney centres (rather than being additional or new jobs).

* However, huge tracks of one & two storey housing get built along the North-South rail line (to fund it's construction) – and the resulting residential population growth vastly overwhelms any new jobs. Western Sydney's jobs imbalance gets even worse as a result.

* An evaluation study on the effectiveness of the \$50 billion rail investment concludes that Western Parkland city isn't likely to become a metro scale employment centre, and instead downgrades it to the same strategic hierarchy as Campbelltown (which instead of an airport has health/education assets & an intermodal freight terminal in Moorebank as it's key catalytic jobs hubs). Essentially NSW has invested \$50 billion to build a Campbelltown Mk II.

Risk Factor 2: Narellan Mk II, built at cost of \$3-5billion

* NSW and Federal government build new roads to Western City at cost of \$3-5 billion but do not build any railway lines (despite a GSC strategic plan to do so).

* Airport is built, but achieves a lower degree of success

* A lot of housing is built at Western City due to a policy promoting greenfield development and urban sprawl and low land prices due to the perception of aircraft noise impacts

* The resulting city looks like a bigger version of Narellan, but with an airport attached

Recommendations

- Review the location of the 3rd city within the 3 cities concept.
- Review rail connections to Western Sydney for cost effectiveness to serve Region

Objective 2: Infrastructure aligns with forecast growth – Growth Infrastructure Compact

FROGS endorses the application of the Growth Infrastructure Compact to GPOP. GPOP is in fact already at a convergence point of extensive transport infrastructure (Northern, Old South, New South, Inner West, Western/Blue Mountains lines, Richmond line, Carlingford/future light rail). However, FROGS supports additional intensive infrastructure investment - both transport infrastructure and across other domains of infrastructure (educational, health, cultural, sport, legal/police). The aim of this additional investment should be to realise large scale of housing supply and employment growth commensurate with a region wide scale.

Recommendations

- Review cost/effectiveness of transport plan connections to Western Sydney particularly rail

Objectives 3-4: Infrastructure use is optimised, Infrastructure adapts to meet future needs

FROGS endorses the general principles expressed within this objective on page 33 of the draft plan.

It is time to move beyond expressing general principles and into action/implementation. This means hard decisions need to be made:

1. For example, the principle of “allocating road space to support increased mass transit services” needs to be translated into concrete action to identify which roads and the schedule by which reallocation takes place. Only the GSC has the strategic planning and overarching vision for land use - and road space policy cannot be left to RMS alone. As GSC itself correctly identifies, sector-specific “agencies are not always able to identify and exploit potentially valuable place-based interdependencies”.

2. The goal “change behaviours through charging users so that consumers are motivated to use services off peak” is commendable but needs to be translated into concrete plans specifying which users, and which services and at what future time schedule? Again, motorways (at least where Government owned) are a key area for GSC to insert itself into a leadership role - there has been too much motorway planning done purely from a road focus and without enough emphasis on broader social, amenity, and multimodal transport perspectives.

3. Parking provision: caps should be applied for all new residential and commercial development across Sydney located near public transit. Given this is a Sydney-wide issue, GSC needs to explore *both* “soft” collaborative and “hard” legal and regulatory mechanisms to ensure councils give this issue the priority it deserves.

4. FROGS would also advocate for control over NSW parking space levies to be transferred over to GSC. The existing parking space regulatory regime has been essentially static for decades, despite major changes in the urban structure of Sydney during this time. For example, Macquarie Park has developed into a strategic centre comparable to North Sydney and Parramatta, yet remains exempt from levies which the latter two are not exempt from. Unsurprisingly, Macquarie Park has some of the lowest public transit mode shares of any major employment centre, and has nearly as many car spaces as Sydney CBD itself despite only having less than one-sixth the jobs of Sydney CBD.

5. GSC needs to be directly involved in actioning/implementing it's Transport Interchange policy (see Objective 22 response below).

Recommendations

- Review transport plan and prioritize to optimize cost effectiveness connections to Western Sydney.
- Widen transport plan to cover all aspects including parking provision and transfer control to State

Objective 5: Benefits of growth realised by collaboration of governments, communities and business

FROGS endorses the concept of Collaboration Areas, City Deals and Priority Growth Areas/Precincts. However, it is important there will not be a dilution on the timeliness, decisiveness and accountability for deliverables as a result of the collaboration process.

Recommendations

- Enhance collaboration between parties with targeted groups based on representation and knowledge and not government politics and noisy minority groups

Objective 6: Services and infrastructure meet communities' changing needs

FROGS agrees with GSC's identification that “that the people of Greater Sydney have strong neighbourhood preference... 80 per cent of people moving locally within the city move less than 15 kilometres”. This needs to be translated into concrete action to ensure adequate provision for “brownfield” housing in established suburbs, rather over-relying on “greenfield” housing in a Western Parkland city for which there is currently very little established population.

Recommendations

- Review districts within Greater Sydney to align with community interests and relationship preferences; extend to include Hunter and Illawarra

Objective 7: Communities are healthy, resilient and socially connected

FROGS agrees with “mixed-use neighbourhoods”, “walkable places with active street life”, “strong social networks” and the other general principles expressed on page 43. However, these attributes are more characteristics of older, more established suburbs. We are yet to be convinced on the capacity “bandwidth” of state government, local government and the property industry to retrofit existing suburbs which lack these amenities. It is unrealistic to raise expectations which cannot be met in a timely manner. Also, it will undermine the legitimacy of planning for growth if such growth is provisioned most in the very suburbs which are most

lacking these amenities, whilst more established suburbs with deeper social capital and infrastructure do not get allocated their appropriate share of growth.

Recommendations

- Review districts within Greater Sydney to align with community interests, relationship preferences and social connection

Objectives 8-9 & 13: Greater Sydney's communities are culturally rich with diverse neighbourhoods, Greater Sydney celebrates the arts and supports creative industries and innovation, Environmental heritage is conserved and enhanced, and Sustainability Objectives 25-38

FROGS agrees Sydney's multiculturalism, environmental heritage, vibrant arts community, creative industries and innovation make it a leading global city.

Recommendations

- Review districts within Greater Sydney to align with community interests and relationship preferences

Objectives 10-11: Greater housing supply, Housing is more diverse and affordable

Objective 17: Regional transport is integrated with land use

FROGS endorses the framework for determining location of housing supply within the scope of GSC's Sydney Region planning. In particular, the Eastern City, Central City and North district all should provision for the quota of housing identified in Table 3, if not an even higher amount. These provisions should be actioned sooner rather than later.

However, FROGS recommends more study and evaluation of the housing target for the Western City, and in particular whether a greater role can be found for satellite cities like Wollongong in meeting Sydney's housing needs. This commensurately also means some of the associated infrastructure (eg. a multiplicity of Western Sydney airport rail lines) should also be competitively evaluated against faster rail links to satellite cities.

Plans have been put forward to the Federal Faster Rail EOI process Stage 2, currently being evaluated for funding potential under the newly released National Rail Program Criteria, which involve faster rail links around Sydney - including links from Canberra and from Newcastle. Transit times available from the adoption of higher-speed rail technologies available overseas, would put Wollongong between 60 minutes (or in the extreme 45 minutes) from Sydney City with similar times from Newcastle, and even faster from the Central Coast. However, all of such plans involve major capital expenditures that can only be catalysed by the Commonwealth's own balance sheet or revenue raising powers. Nevertheless, with the impending decline in fuel tax revenues it is thought that formal road pricing will eventuate in the 1st half of GSC's planning horizon and hence that projects of that type will be at least started in that time frame.

Recommendations

- Increase affordable housing supply especially within centres, target 20%. Fund through value capture from higher floor space ratios where provided
- Review pricing strategy for transport
- Adopt alternative taxing system for transport with decline in fuel tax as a resource; move to distance based vehicle tax system with funds used for all transport not just roads

Objective 12: Great places that bring people together

FROGS endorses the general principles outlined in page 61-63, but believe there is an urgency to move into action and implementation. Understandably GSC is focused on Collaboration areas where it is directly involved but wider metropolitan actions such as in Objective 4 should also be delivered.

Recommendations



Objective 21: Internationally competitive health, education, research and innovation precincts

FROGS endorses the overall framework for Sydney's health/education precincts and looks forward to continued actioning and implementation.

However, FROGS believes an alternative model for health/education within GPOP is to plan and conceptualise for both Westmead and Concord hospitals to be the Western and Eastern anchors of an overall "GPOP Health/Education district" which also includes potential university campuses within Sydney Olympic Park, as well as the Justice Health facilities in Silverwater and Olympic Park.

This may require some re-organisation of Health districts, as currently Westmead is the teaching hospital for Sydney West local health district (LHD), whereas Concord is part of Sydney LHD. There may be a case for restructuring these health districts to create a "GPOP health district" consisting of Westmead, Auburn and Concord hospitals. Royal Prince hospital will remain the tertiary teaching hospital for Sydney LHD, which may be more appropriately named Eastern Sydney LHD.

Recommendations



Objective 22: Investment and business activity in centres

FROGS endorses the principles outlined in page 103, namely emphasis on private investment, private sector led decision making, wide mix of land uses including residential, and walkability. However, stronger actions need to be taken to fully realise these principles, eg. the current haphazard parking levy system distorts private sector decision making as it is not competitively neutral by penalising North Sydney & Parramatta whilst favouring Macquarie Park.

FROGS endorses the emphasis of transport interchanges, namely "potential for interchanges to deliver mixed-use, walkable centres and neighbourhoods". However, FROGS is concerned that leaving action/implementation to councils is inappropriate, as transport interchanges are metro-wide and system-wide assets which are funded by state government investment. Councils do not have the appropriate governance structure to ensure optimal system-wide outcomes.

Recommendations

- Support funding of State initiatives through value capture from more generous development opportunities than LEPs permit

Objective 23: Industrial and urban services land is planned, protected and managed

FROGS accepts the rationale presented by GSC for protection of industrial and urban services land overall and has confidence GSC will find the right balance to making land use more "jobs intensive" whilst still protecting their industrial/urban services functions

Recommendations

- Protect land for services by incorporation of appropriate zoning in LEPs

Objective 39: A collaborative approach to city planning, Plans refined by monitoring and reporting

See introductory comments on first page of this submission regarding reducing planning "red tape" by stripping out duplication between District and Region plans, and increased emphasis on action/implementation and council/RMS accountability.

Recommendations

- Review centres and district plans to align with each other
- Enhance relationships with community using targeted groups selected for representation and contributory knowledge rather than political idealology and noisy minority views.

