



# Australian Institute of Landscape Architects

Greater Sydney Commission  
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March 31<sup>st</sup> 2017

Dear Commissioners

## **Comments on the District Plans**

As NSW President of the Australian Institute of Landscape Architects, I am writing on behalf of our members who have expressed an interest in the District Plans and wished to provide comments.

We recognise your collaboration with AILA NSW and our members in the process of developing the plans and are pleased that you have taken on board some of the ideas and philosophies we expressed – particularly the strong emphasis on our landscape and urban green infrastructure. At this key point in the District Plan development we now have further comments that we have collated from our District Plan review team and our AILA members.

To help in your review of these I have summarised our response into a top ten list of comments (not necessarily in order of importance).

1. AILA NSW strongly supports the existence and work of the Greater Sydney Commission in its task to provide direction to the development of the metropolitan area, the districts and Australia's global city. The GSC goals of a liveable sustainable and productive city are vital.
2. The Sydney landscape is our greatest asset and essential for the future well-being of the city. The Sydney Green Grid is a powerful tool to value and improve this landscape as well as unify and give guidance to the city. It should be a living document continually developed, prioritised and rapidly implemented before land is used for other purposes or increases in price further.
3. The naming of the Parkland City, River City and Harbour City is a significant innovation and game changer and should be continued and strengthened - the Parkland City being the most important at the current time. The names go beyond the usual placeless geographic terms (eastern central and western), inspire a place based focus on development and challenge the 'normal' thinking of state departments.
4. Design Policy, Procedures and Principles are urgently needed for the Greater Sydney area, building upon and utilising existing local government and state design policies.
5. A landscape character analysis of the Parkland City area is needed to identify the values, strengths and constraints of this area and inform further development.
6. The District Plans should recognise the landscape places set down in the draft AILA Landscape Conservation Listing Project study funded by the Heritage Grants program of the NSW Office of Environment and Heritage.



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7. The GSC should rapidly deliver some key Green Infrastructure city shaping projects to consolidate its role and value to Sydneysiders. There are a number of initiatives currently in place that could be leveraged for this. These include, but are not limited to: the redefining of Pennant Hills Road, when NorthConnex opens, as a transit boulevard, supporting towns and communities, enabling active transport and providing a green corridor. The approval of the Rouse Hill Regional Park extension. The improvement of access and managed recreation activities at Prospect Reservoir. The connecting and completing of existing major green active transport links built or proposed as part of the Sydney Motorway network to create an 'east west super cycleway' joining the Parkland, River and Harbour Cities.
8. A process of open space assessment and provision needs to be established to ensure there is sufficient quality and quantity of parks for the growing city and that people are located within walking distance of a choice of public spaces.
9. The GSC must acknowledge, value, consult and integrate Aboriginal culture, practices and art into the District Plans, projects and guidelines in order to enhance the quality of the city, its sustainability and its 'connection to country'. This is something the Australian people have asked for - *"Most Australians (72%) believe Aboriginal and Torres Strait Islander cultures are important to Australia's national identity"* (Australian Reconciliation Barometer, February 2017, published by Reconciliation Australia). It is recommended that a Commissioner is made responsible for this task.
10. There should be a clear source of funding and means of prioritisation for green infrastructure projects so that the community has confidence in the implementation of the District Plans.

Please do not hesitate to contact me should you require any further information and clarification of these comments.

Gareth Collins

NSW President AILA



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# DISTRICT PLAN REVIEW

**Australian Institute of Landscape Architects, NSW**

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## **Acknowledgments**

The following people contributed their time and knowledge into the review of the District Plans:

District Plan review team:

Noel Corkery  
Julie Lee  
Gareth Collins  
Adam Fowler  
Suellen Fitzgerald  
Joshua French

AILA member responses:

Annabel Murray (on behalf of the AILA NSW Landscape Heritage Committee)  
Kurt Henkel  
Martin O'Dea  
David Martin  
Crosbie Lorimar



## General Comments from AILA members

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AILA NSW supports the GSC's aims and District Plan process.

A process of open space assessment and provision is established to ensure there is sufficient quality and quantity of parks for the growing city and that people are located within walking distance of a choice of parks.

AILA NSW supports the Parkland, River and Harbour City names as they are supporting a character to the whole city and strong differences between areas relating to landscape. The character of these different cities should be illustrated and emphasised in the document and used to inform the District Plans.

Throughout the community consultation program the GSC has emphasised the unprecedented challenges posed by the scale and speed of urban development that will take place in Sydney over the coming decades. The current combination of legislation, planning process, incentives, urban design, infrastructure, community engagement and on-going management are acknowledged as inadequate to meet this challenge. AILA considers that to effectively create enjoyable, safe, equitable and sustainable urban environments will require fundamental shifts in the current process of planning, implementing and managing urban development.

While acknowledging that the SWDP is a draft document it is largely a series of aspirational statements set within the framework of the current urban planning and development process. The District Plan needs to incorporate a clear statement on what fundamental changes are proposed, how they will be made, who will be responsible, how they will be resourced and funded.

A key aspect of the District Plans is that they "... are not a mandatory matter for consideration in the determination of a development application ...". It is therefore essential that the District Plans clearly articulate what incentives will be established encourage and assist Councils to incorporate the District Plans in their planning decisions.

Implementation of the 'Green Grid' is identified as a key component of the Vision. The District Plan therefore needs to clearly explain what new arrangements are going to be put in place to implement the Green Grid within the time frame of the projected urban development, new airport construction and population growth. This will require assigning responsibility for coordination to a discrete authority or organisation, staff resourcing, funding and on-going monitoring.

Provision of an integrated network of open space is essential for the health and well-being of existing and future populations. The District Plan therefore needs to describe the strategic planning, detailed design, delivery and management of open space to ensure it is adequate in terms of capacity, equitable in terms of facilities and is connected and accessible to the people who are intended to use it.



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While the District Plan refers to the provision of an open space planning 'Toolkit' for Councils to use, effective planning and delivery of open space needs to be addressed at both a strategic regional scale as well as the local scale. AILA therefore strongly recommends that the GSC take the lead in addressing this key aspect of urban development.

It is important for the GSC to conserve significant landscape places for their historic, aesthetic, scientific and social (sense of place and identity) values at local, state, national and world heritage level as indicated in the Draft AILA Landscape Conservation Listing Project study funded by the Heritage Grants program of the NSW Office of Environment and Heritage. This includes conserving all places listed on State Heritage Inventory Projects, listed or nominated for State Heritage Register and on the non-statutory AILA Significant Landscapes list, available and updated on the AILA website.



## Precinct Comments

### Central District Plan Review

Reference	Comment
The aspiration for Central District	1. The AILA can strongly endorse the aspirations of the plan and acknowledge (as the plan itself says) realising aspirations relies on “enabling infrastructure” coordinated renewal and striving for innovation and quality.
Multi-centred, not single	2. Central is at the centre of the Eastern City. Its optimal future relies on growing role to other precincts within the Central District, and more broadly, on the multi-centred metropolis vision of the GSC, such that Central can retain its key role in economic competitiveness without being so loaded that liveability or unique assets – heritage, environmental- are put at risk. So multi-centred as a tempering force.
Green Grid	<p>3. Green grid priorities – important to prioritise some key projects, but the value of the green grid concept recognises each link in the lattice strengthens the whole, and can be pursued at a range of scales – from harbour foreshore link, to green liveable streets connecting local and district open spaces. Guided, coordinated effort over sustained period to realise the potential of this idea.</p> <p>4. The need to increase connectivity and to retrofit existing open space must be in concert with the creation of new open space. Whilst challenging, this needs to be understood as essential supporting infrastructure to the evolution of Sydney. Generation of new open space needs to be part of the renewal of existing lands and the reconsideration of under utilised green spaces such as forest, military reserve and national parks.</p>
Health/ education hubs	5. Endorse the focus on the health education super precincts and highlight the importance of a precinct approach to the public domain that is the connecting tissue of the precincts. The benefits of a campus that contributes and is enriched by the locality in which it is placed is also important.
Westconnex Opportunity  Impact +F6	<p>6. Recognise the importance of leveraging more urban benefits from the enormous investment in Westconnex, realising the opportunity to return local streets to local communities, enable urban renewal and improved transport, particularly to secure benefits to our Freight Gateways.</p> <p>7. Urban design excellence should be deployed to minimise and mitigate the impacts of the insertion of road infrastructure in this highly productive and valuable area of Sydney. F6 extension is a future example that threatens the green grid if implemented without recognising the coexisting value of urban land as green infrastructure</p>



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Visitor Economy	<ol style="list-style-type: none"><li>8. Acknowledge it is essential to have a well-planned Sydney City that can retain and grow the visitor economy and highlight the importance of fostering the vibrancy of neighbourhoods as part of a broader visitor offer.</li><li>9. Highlight the landscapes within the Central District that have the potential for investment to better serves both the visitor and resident/worker communities – Parramatta River, Cooks River. These are fantastic platforms for revealing the City’s Aboriginal heritage</li><li>10. Endorse both strengthening and <u>diversifying</u> the night time economy and highlighting the role of well-designed public domain that create a social setting for night life.</li></ol>
Housing diversity and capacity	<ol style="list-style-type: none"><li>11. Acknowledge need and highlight need for quality in implementation - particularly of associated public domain, open space or community facilities, key to the success of higher density.</li><li>12. Like housing stock, the public domain must equally be retrofited for accessibility, for multi-generational use and for sustainability.</li></ol>
Sustained capacity building	<ol style="list-style-type: none"><li>13. Endorse to ensure to optimise siting of housing location, and align infrastructure, including green infrastructure investment to reflect these plans.</li></ol>
Education	<ol style="list-style-type: none"><li>14. Agreed, <i>and</i> our planning should consider the opportunities to develop Sydney as a child friendly city in the broadest sense, inviting children and young people to be present, to be safe and to be participants in the City.</li></ol>



## Central West District Plan Review

Reference	Comment
	1. Urgent need for a recreation 'carrying capacity' analysis for the existing parklands/open space system and Recreation Participation Strategy addressing projected future demand for both active sports and passive recreation.
	2. Active transport movement and open space linkage analysis for high density residential precincts in proximity to regional open space.
	3. Consideration of constraints imposed by competing land uses such as bio-diversity objectives (currently 79% of open space within SOP Parklands is zoned for 'conservation' purposes).
	4. Criticality of capital and recurrent funding commitments from NSW Finance & Treasury to deliver (and maintain) regional level 'green infrastructure' assets supporting a 80,000-100,000 sub-regional resident population within GOP urban renewal precincts.
	5. Need for a whole-of-govt approach to mitigation/adaptation to climate change impacts such as tidal inundation, sea level rise, potential salt water intrusion into remediated landfill systems, accelerating loss of green cover due to urban consolidation, elevated risks of flooding and wildfire in grasslands and vegetated areas.





## West District Plan Review

Reference	Comment
<b>M12</b>	The M12 should be designed as gateway to the City and major spine in the Parkland City with sufficient space for a long term sustainable tree cover, integrated art, and a contributory role to open space and active transport.
<b>Character</b>	A landscape character assessment should be carried out for the Western city. It should identify the key places, heritage assets, cultural values and points of interest and character that will help define the Parkland City.
<b>Western Sydney City Deal</b>	The City Deal should include funding to allow implementation of the Green Grid and other Green Infrastructure, acquisition and embellishment of required Regional Open Space and restoration and enhancement of major rivers and creeks.
<b>Development of Penrith</b>	Penrith needs to develop a strong and identifiable sense of place building on the existing landscape character. There is an opportunity to better connect Penrith CBD with the Nepean River and residential areas that will enhance this Strategic Centre.
<b>Projects</b>	Warragamba Pipeline Open Space Corridor will provide a major linear connection between key destinations allowing connected walking, active transport and biodiversity opportunities and should be given a higher priority for development and implementation than indicated in the District Plan
<b>Farming in the Sydney Basin</b>	The District Plan does not adequately address agricultural landscapes and the long term vision for food production and agricultural landscapes is in the Sydney basin.
<b>Western Sydney Airport</b>	An Urban Design and Landscape Vision for the Airport and surrounds should developed early to ensure that this future gateway into Sydney is world class. As a major arrival point to Sydney the airport needs to have a strong identifiable design respectful of the Parkland City and the built natural and cultural context of the area. The GSC should have a role in the design approach supporting a design lead landscape approach.



## South West District Plan Review

Reference	Comment
General	<p>Throughout the community consultation program the GSC has emphasised the unprecedented challenges posed by the scale and speed of urban development that will take place in Sydney over the coming decades.</p> <p>The current combination of legislation, planning process, incentives, urban design, infrastructure, community engagement and on-going management are acknowledged as inadequate to meet this challenge.</p> <p>AILA considers that to effectively create enjoyable, safe, equitable and sustainable urban environments will require fundamental shifts in the current process of planning, implementing and managing urban development.</p> <p>While acknowledging that the SWDP is a draft document it is largely a series of aspirational statements set within the framework of the current urban planning and development process.</p> <p>The District Plan needs to incorporate a clear statement on what fundamental changes are proposed, how they will be made, who will be responsible, how they will be resourced and funded.</p>
	<p>A key aspect of the District Plans is that they "... are not a mandatory matter for consideration in the determination of a development application ...".</p> <p>It is therefore essential that the District Plans clearly articulate what incentives will be established encourage and assist Councils to incorporate the District Plans in their planning decisions.</p>
	<p>Implementation of the 'Green Grid' is identified as a key component of the Vision. The District Plan therefore needs to clearly explain what new arrangements are going to be put in place to implement the Green Grid within the time frame of the projected urban development, new airport construction and population growth. This will require assigning responsibility for coordination to a discrete authority or organisation, staff resourcing, funding and on-going monitoring.</p>
	<p>Provision of an integrated network of open space is essential for the health and well being of existing and future populations. The District Plan therefore needs to describe the strategic planning, detailed design, delivery and management of open space to ensure it is adequate in terms of capacity, equitable in terms of facilities and is connected and accessible to the people who are intended to use it.</p> <p>While the District Plan refers to the provision of an open space planning 'Toolkit' for Councils to use, effective planning and delivery of open space needs to be addressed at both a strategic regional scale as well as the local scale. AILA therefore strongly recommends that the GSC take the lead in addressing this key aspect of urban development.</p>



Page 1 – Vision	The Greater Sydney Commission recognises the unprecedented challenges presented by the scale and speed of development in the Western City of Sydney. The current planning processes and land management arrangements are acknowledged to be inadequate. The Vision therefore needs to acknowledge that in order to meet the challenge there will need to be major shifts in the current approach to planning. Refinements to the existing planning arrangements will not meet the challenge.
	AILA considers that the Vision should acknowledge that ‘Green Infrastructure’ equally important as other infrastructure in achieving the goals articulated in the Vision.
	The Vision should acknowledge the importance of public open space and high quality public domain to the health and well-being of people living in the SW District.
	The rapidly growing role of digital technology in providing data and information to people and as a means of engaging the community should be acknowledged in the Vision.
	Climate change adaption, resilience and sustainability need be addressed in the Vision.
Page 4 – Productivity Priorities & Actions	Provision of public open space should be addressed in terms of quantity, quality and connectivity/accessibility.
Page 7 – Liveability Actions	Creation of new open space and upgrading facilities of existing open space to meet the needs of the future communities needs to be included in the list of actions.
	Climate change adaptation measures should be included in the actions.
	Implementation of the Green Grid will form a major component of Liveability and should be included as a key action.
	Creation of an integrated network of pedestrian and cycle paths should be included as a key action in the District Plan.
Page 7 – L11	Design-led planning needs to be explained in terms of Who? How? Why?
Page 9 – Sustainability Actions	Implementation of the Green Grid should be included as a key action
Page 9 – S6	Given that councils will have a major role in implementing the District Plan AILA considers that they should be involved in preparing the Plan.
Page 9 – S9	Councils should be involved in preparation of the tools, which they will be expected to use.
Page 12 – insert	AILA considers that smart phones and other communications technology will play



	an increasingly significant role in providing communities with information about open space recreation and community facilities as well as assisting navigation and interpretation.
Page 15 – 1.1.3	Clarification is required in relation to first sentence which states that “.. councils will be required to give effect to District Plans as soon as practical ...” and following statement that “... District Plans are not a mandatory matter for consideration in the determination of a development application ...”  The District Plan need to explain what incentive and assistance there will be for councils to take account of the District Plans?
Page 17 – 1.2.3	Green Infrastructure should be included in the discussion; incorporating parks, open space, riparian corridors, the Green Grid, National Parks and Reserves.
Page 19 – 1.3	AILA considers that professional planning and design bodies should also be listed as providing valuable input to the District Plans.
Page 47 - 3.3	Cycleway networks should form part of integrated transport planning.
Page 51 – Action P10	Creation of a cycleway network should form an action to create an integrated public transport system.
Page 52 – Action P11	The Development Code needs to address open space provision in a comprehensive manner at all scales including local, district and regional open space.
Page 57 - Action P13	Clarification would be helpful as to why some areas are identified as ‘Collaboration Areas’ when the description would appear to apply to the planning and design of all urban centres.
Page 81 – 4 A Liveable City	The need for new open space to meet the needs of the projected large new population should be acknowledged.
	Implementation of the Green Grid, which is detailed in section 5.6, will form a key component of the Liveable City and should be included.
Page 82 – Liveability Framework	Dot points should include provision of new open space, quality of facilities and connectivity/accessibility to users, as well as funding and management structure.
Page 109 – 4.6.1	Need to explain what is meant by design-led planning and how it is different from the current planning process.
Page 110	The Seven Principles should address the role of public open space and the public domain in high quality urban environments.
Page 115 – 4.7.2	Availability of low cost studio space for emerging artists is a significant issue that should be addressed.
Page 116 – 4.7.3	The discussion of open space should acknowledge the need for new open space and provision of at local, district and regional levels in terms of quantity, quality and connectivity/accessibility to users.



<p>Page 127 – 5 Sustainable City</p>	<p>Dot points should include</p> <ul style="list-style-type: none"> <li>• Stormwater management and waste water re-use</li> <li>• Sustainable energy, particularly solar collectors on the large roof areas of industrial buildings</li> </ul>
<p>Page 130 – 5.3</p>	<p>The District Plan needs to discuss how the GSC will engage with the Western Sydney Parklands Trust to coordinate the provision of open space recreation facilities in relation to the projected population increase and infrastructure development in areas adjoining the Parklands.</p>
<p>Page 131 – Sustainability Priority 1</p>	<p>AILA considers that mapping and assessing scenic values should involve GSC and OEH working in collaboration with Councils to ensure the methodology used is consistent across all the Districts.</p> <p>Identification of ‘important scenic landscapes’ should involve communities in the process of determining why they are considered important.</p>
<p>Page 145 Action S8</p>	<p>The level of funding available though the existing programs mentioned is very limited in relation to what is required to effectively implement the Green Grid in the same time frame as the projected scale of development and major population increase.</p> <p>Adequate funding levels need to be determined and arrangements made to effectively implement the Green Grid.</p> <p>Implementation of the Green Grid also needs to address in terms of land ownership and management structures to ensure long term sustainability.</p>
<p>Page 145 Action S9</p>	<p>AILA considers that the relevant councils need to be involved in development of the toolkit to ensure it can be effectively applied with the resources available to council. The GSC needs to lead the process of strategic planning and provision of open space to ensure it is coordinated across the various Districts.</p> <p>Development of the toolkit needs to proceed as a matter of urgency so that planning by Councils can ensure that adequate areas of open space are created in the required locations to meet the needs of the new communities</p>



## South District Plan Review

Reference	Comment
<b>General</b>	1. Open space is a key cross boundary issue and the plan should assess current and future provision for the community so that people are no more than 10 minutes' walk from high quality open space. Whether in this district or neighbouring ones.
<b>Section 3.8 page 62 &amp; 63</b>	2. Regarding the F6 corridor suggest adding assess the risks and opportunities of the proposed motorway including improving bypassed roads by rezoning land and creating development opportunities, improving mass public transport, improving walking and cycling contributing to the pedestrian economy with better access to shops and business and using the corridor to link up green space.
<b>Page 130</b>	3. Suggest adding a statement. We will help councils to mitigate urban heat island effect by supporting programs and the implementation of the planting of more trees in predominantly paved areas, including streets and car parks.



## North District Plan Review

Reference	Comment
<b>Liveability actions</b> <b>Action L15:</b> <b>support planning</b> <b>for shared spaces</b>	How is the increase in ‘the provision of community facilities, including open space’ to be implemented and measured? Will the shared space associated with the public realm also be designed for sharing i.e. streets that can be closed at different times?
<b>Action P3:</b> <b>Create a Sense of</b> <b>place, grow jobs</b> <b>and diversify</b> <b>activity in</b> <b>Macquarie Park</b>	Collaboration Area:  The transition from business park to walkable commercial centre requires supplementary detail to guide and confirm specifics of considerations.
<b>Action P4:</b> <b>Facilities place</b> <b>making and the</b> <b>growth and</b> <b>diversification of</b> <b>job opportunities</b> <b>in St Leonards</b>	Future open space allowances should be defined so minimum areas are maintained.
<b>North Sydney and</b> <b>Chatswood</b> <b>centres</b>	Opportunity for CBD facilities to be used by local communities to extend use beyond business hours and provide activation at all times.
<b>Action L4</b> <b>Housing diversity</b>	Housing diversity should include quality external public and private open space and be connected to the Green Grid.
<b>Action L12</b> <b>4.6.3 Enhance</b> <b>walking and</b> <b>cycling</b> <b>connections</b>	Connections should be linked to Green Grid initiatives.
<b>Action L15</b> <b>Support planning</b> <b>for shared space</b>	Support Action, shared use will support the building of community.
<b>Sustainability</b> <b>priority 3: enhance</b> <b>access to Sydney</b> <b>Harbour foreshore</b> <b>and waterways</b>	Complete harbour edge access routes (adjacent to developed areas) to create continuous and linked connections as part of Green Grid.
<b>5.6</b>	National Parks within Northern district require integration in terms of assessing future demand and opportunities for public use which do not



<p><b>Delivering Sydney's Green Grid</b></p>	<p>compromise Sustainability Priorities.</p> <p>Opportunities for additional funding (public and private) for reinvestment into parks should be considered.</p> <p>Street trees which are critical to the Green Grid strategies should be designed and implemented in conjunction with the review of underground and overhead infrastructure which are often constraints to achieving a consistent and meaningful green canopy. Meaningful dialogue needs to occur with infrastructure authorities to review setbacks, clearance zones, installation and the use of shared trenching.</p>
<p><b>Action S5: Update the Urban Green cover in NSW Technical guidelines to respond to solar access to roofs.</b></p>	<p>Consideration should be given to the overall value of trees in the public realm and if they contribute to a consistent streetscape and the provision of improved microclimate and amenity versus overshadowing of solar panels.</p> <p>Generally, in private properties, large trees are not installed due to space restrictions.</p> <p>Guideline should not allow the removal of existing trees in the public realm for the purpose of solar access to roofs.</p>
	<p>There is an important opportunity to promote a rethink of the character of Pennant Hills Road post NorthConnex.</p> <p>It could lead to a substantial shift in the character of both the Pennant Hills and Thornleigh Town Centres.</p> <p>There should also be consideration of changing the road to create a strong boulevard that contributes to bringing the two sides together while also providing an attractive route for cycling.</p>