



13 December 2017

Greater Sydney Commission
Attn: Maria Atkinson, Eastern City Commissioner
PO Box 257
Parramatta NSW 2124

Via email: submissions@gsc.nsw.gov.au

Dear Ms Atkinson,

RE: Revised Draft Eastern City District Plan

The Sydney Business Chamber (The Chamber) welcomes the opportunity to comment on the Greater Sydney Commission's *Revised draft Eastern City District Plan* ("the Plan").

As you are aware, the Chamber is a division of the NSW Business Chamber and represents Sydney's leading corporations as well as organisations from the government and not-for-profit sectors. On behalf of members, the Chamber advocates for Sydney to be a competitive and sustainable global city. The Chamber strives to identify, develop and promote the major issues that contribute to economic activity and growth in Australia's global city, Sydney. This is achieved on behalf of business by representation and collaboration with governments at the local, state and federal level.

At the outset, the Chamber reiterates its support of the development of District Plans to provide strategic direction to Sydney's six districts and a link to the overarching 40-year vision contained in the Greater Sydney Regional Plan. District Plans play a critical role in connecting Local Environment Plans and the metropolitan planning document, and will provide a guide for local planning to achieve local, metropolitan and state-wide objectives.

The Eastern City District (the District) remains the critical economic hub within the Eastern Harbour City. The district is home to Australia's pre-eminent CBD which not only drives the economy, but drives Sydney's capacity to claim global city status. Everything that is done within the District must support and enhance that core business function.

Employment Opportunities

The Revised Draft Plan continues to recognise the importance of adequate commercial floor space and the need to protect and expand retail opportunities. The Chamber welcomes this commitment as the commercial and retail sectors will be critical to future jobs growth.

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The Chamber notes however that to achieve the Strategic Direction of *Jobs and Skills for the City* more will need to be done to protect industrial and urban services land (Planning priority E12).

While the key threat to these activities is rightly acknowledged as residential encroachment, industrial precincts are also under threat by attempts to encourage or establish new industry hubs. For example, the Inner West Council is currently debating the development of a “creative hub” in Sydenham. The Chamber does not oppose such uses, but the identified area is already a successful industrial precinct and if this changes, the jobs and communities the hub supports will be displacedⁱ. As the Revised Draft Plan recognises:

Small, inner-city industrial precincts have relatively affordable rents and provide high proportions of urban services jobs for local communities. The value of these precincts should not be underestimated.

The Chamber welcomes the proposed net community benefit testⁱⁱ which requires councils to assess the need for developing a new strategic centre justified against the potential loss of industrial land uses. The Chamber would suggest further direction should be provided to councils by the Commission on how this test could be utilised to assess the relative impacts on existing employment activity as a result of a change of use in an industrial zone. This would ensure proper consideration is given to these impacts such as in the scenario outlined above.

In addition, while the Chamber strongly supports and endorses recognition of Port Botany as a specific precinct that should be protected from encroaching residential and other incompatible land uses, it is concerned that the same protections are not identified for some of the critical industrial land on Sydney Harbour. Glebe Island in particular still plays a critical role in terms of bulk cement, sugar and gypsum into and out of Sydney. How this role is accommodated and other industrial land uses around the harbour must be a focus over the lifetime of the Plan.

30-minute access to jobs and services

The Chamber continues to support the inclusion of 30-minute access to jobs and services as a key priority. This has also been identified by the Federal Government as a national priority under the Smart Cities Plan. However, the Chamber notes that the Plan does not include reference to any demand management initiatives as part of the mix of actions to achieve a 30-minute city. This is of concern when journey to work within the District (a District relatively well served by public transport and with a buoyant employment market) is still dominated by cars.

Since 2010, the Chamber has advocated for the NSW Government to develop a Demand Management Strategy for Sydney to combat congestion and get more efficient use out of our infrastructure networks.

The Chamber believes there is scope to expand the use of demand management measures across key parts of Sydney to spread demand for travel across the day and outside of peak hours. A strategy for the implementation of these measures should be developed, and these measures would need to be multi-faceted and implemented through planning tools, transport planning and services, business operations, education sector etc.

The District Plan should consider how an all-of-district approach to demand management could occur and include recommendations for local planning to incorporate measures that encourage demand for travel outside of peak times. The Chamber acknowledges that all employers have a role to play in the hours they determine are core-operating hours and be willing to consider a flexible approach where appropriate.

Technology and Innovation

The Plan recognises the City of Sydney Local Government Area as the hub of Australia's technology and innovation industry. The District acknowledges the importance of this industry to grow and future-proof both the local and national the economy, and therefore includes initiatives to foster the growth of these industries.

Outside of growing the industry sector, the District Plan should also focus on how best to position the District to take advantage of technology innovations in everyday life to the benefit of businesses and residents (as "users" of technology). Planning mechanisms designed to encourage and accommodate technology innovations can position the District as an exciting and innovative area where people want to live and work.

For example, Sydney is one of the only global cities, and capital cities in Australia, without free Wi-Fi available in its CBD. Free Wi-Fi provides a premium visitor experience, encourages innovation and enhances liveability.

While responsibility for the delivery of these innovations may ultimately be borne by local councils, the Plan should identify the need for the District to be positioned to accommodate technology advancements and also acknowledge where this is scope to make the District more technology-ready.

Midtown Growth

The Chamber welcomes the identification under Planning priority E7 of the need to make the Harbour CBD more competitive and its specific

identification of the need for the mid-town and southern precincts in helping to accommodate further office development (in particular larger floorplates of between 800-2,000 square metres).

The Chamber has been a vocal advocate of the need to better recognise the growth potential the midtown area offers and supports initiatives that assist in facilitating urban renewal occurring (especially in and around Central station). Measures that ensure there remains a healthy balance between residential and commercial uses in the CBD are strongly supported.

Tourism

In addition, the Chamber supports the Plan's focus on growing and managing the visitor economy. Sydney's status as Australia's only global city provides Sydney, and in particular the Eastern District, with a distinct competitive advantage in this market segment, and therefore the District should aim to capitalise on opportunities to grow this segment. 'Business' is stated as the purpose of travel to Sydney for almost 30% of domestic visitors and more than 10% of international visitors to Sydneyⁱⁱⁱ.

The Chamber notes that there is also a need to ensure there are adequate transport connections to support tourism. For example, the refresh of the Darling Harbour precinct, including ICC Sydney, requires bus and coach infrastructure such as pick-up and drop-off zones and layover facilities, and there currently is a lack of these facilities available.

Emerging in Sydney is distinct precincts that support different visitor activities yet unlike other cities the distinctiveness of the precincts is not a feature of how we define the city. Characteristics of each precinct need to be emphasised as part of the strategy. For example, there are unique characteristics of the Eastern and Western Harbour, defined by the Sydney Harbour Bridge, which are quite distinct to the Haymarket or Paddington/Woollahra.

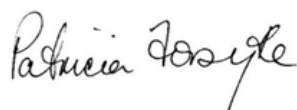
Sport and Recreation

The Chamber acknowledges the focus on liveability, which is defined as being about people's quality of life. We welcome the proposed Participation Strategy to be developed by the Office of Sport with local councils and urge any attempt by local councils to replace active sporting spaces such as golf courses with passive recreation spaces to be resisted.

The Strategy should give greater emphasis to the role of the Moore Park Precinct as a centre of sporting excellence including as a sport health research and training hub as well as a centre of competitive sport.

Thank you once again to provide a submission to this review. Please contact Luke Aitken, Senior Manager Policy NSW Business Chamber on 02 9458 7582 or luke.Aitken@nswbc.com.au if you would like to discuss this submission further.

Yours sincerely

A handwritten signature in black ink that reads "Patricia Forsythe".

The Hon. Patricia Forsythe
Executive Director
Sydney Business Chamber

ⁱ See <http://www.smh.com.au/nsw/small-bars-or-small-factories-the-tough-question-facing-sydneys-inner-west-20171129-gzuw9k.html>

ⁱⁱ https://gsc-public-1.s3-ap-southeast-2.amazonaws.com/s3fs-public/gsc_draft_eastern_city_district_plan_web.pdf

ⁱⁱⁱ Destination NSW (2016) Travel to Sydney: Year ended September 2016
<http://www.destinationnsw.com.au/wp-content/uploads/2014/04/Sydney-YE-Sep-16.pdf>