

Attachment 1

Draft Greater Sydney Region Plan Randwick City Council Submission

Overview

We commend the Greater Sydney Commission (the Commission) on the recent release of the draft region plan – *Our Greater Sydney 2056* and the five revised draft district plans. These long-term land use strategies have been prepared concurrently with the state government’s *Future Transport 2056* and *State Infrastructure Strategy*. This integrated approach to align land use, transport and infrastructure outcomes for Greater Sydney is strongly supported.

As an update of the current Metropolitan Strategy, *A Plan for Growing Sydney*, the draft region plan (the draft Plan) has been prepared by incorporating feedback on the draft amendment *Towards Our Greater Sydney 2056* and draft district plans exhibited between November 2016 and March 2017. Council is pleased to see the collaborative approach led by the Commission in developing the draft Plan and in particular, the following initiatives proposed as a strengthened response to the new trends and challenges for Sydney’s future:

- A new 40-year vision. The draft Plan is built on an aspirational vision for a metropolis of three connected cities where most people can travel to their nearest metropolitan city centre or strategic centre within 30 minutes by public transport. We support this polycentric approach and the vision for three “30-minute” cities towards a more efficient and balanced metropolitan system.
- A new theme centred around infrastructure and collaboration. The new theme has been included upfront in the draft Plan to highlight the importance of alignment between growth and infrastructure and the critical role of collaboration between government, industry and local communities to deliver the optimal outcomes.
- New measures towards improved housing affordability. Affordable Rental Housing Targets (5-10%) have been introduced to boost affordable housing supply, which will apply to new residential floor space generated as a result of upzoning. The draft Plan also encourages the investigation of new housing forms (e.g. built to rent) to provide affordable and longer-term rental accommodation to moderate income households.
- Inclusion of metrics. 14 Metrics have been included in the draft Plan to facilitate monitoring and reporting on the effectiveness of the Region Plan. While the introduction of performance indicators is largely supported, we recommend that the evaluation framework be further enhanced by including more meaningful metrics and corresponding targets (as detailed later).

The following identifies key issues and areas suggested for further consideration and investigation by the Commission prior to finalisation of the Plan. Specific comments on the proposed metrics, objectives and actions are included in the Submission Table. We note that the majority of the strategies proposed in the draft Plan are translated as planning priorities in the district plans. As such, detailed comments on the strategies are incorporated in our submission on the revised draft Eastern City District Plan.

Key issues

Delivery of infrastructure

The Commission has proposed Growth Infrastructure Compacts which will involve state agencies aligning their asset management and investment plans to Government endorsed development sequencing and infrastructure plans in major planned renewal areas. This new approach aims to identify where significant residential and employment growth could occur, what new and enhanced local and regional infrastructure will be needed to support the growth, how much it will cost, how it will be funded and when it can be delivered.

Council supports this initiative and agrees that the Compacts, once appropriately developed, will provide a sound basis for making decisions across agencies such as Transport, Health and Education. We therefore recommend that the Commission consider extending the program to other areas requiring prompt and coordinated delivery of infrastructure to support their growth (e.g. Priority Collaboration Areas). It is also recommended that further details be included to explain how local governments, industry and the community will be involved in the process, especially when developing the vision for growth, mapping out the infrastructure and open space needed and identifying the preferred scenario and associated sequences for growth and infrastructure.

In relation to the funding resources for infrastructure delivery, the Commission argues that the cumulative impacts of development contributions should be carefully managed so that funding infrastructure does not burden private development unreasonably. While acknowledging that development contributions should be feasibility tested, Council recommends that place-specific contribution schemes should be widely explored and implemented for areas undergoing significant growth, as additional levy schemes on top of the local contributions system (e.g. S94 & S94A). This is to recognise these areas' higher demand for infrastructure upgrade and public domain improvements.

Approaches for growth

The Commission has introduced Collaboration Areas to bring together state agencies, local councils and other key stakeholders working towards shared visions and agreed outcomes for nominated areas. Randwick Health and Education Precinct has been identified as a Priority Collaboration Area for 2017-18, which is supported.

As noted in the draft Plan, there are a range of approaches established to support the region's land use and infrastructure planning and delivery, such as City Deal, Collaboration Areas, Priority Precincts, Priority Growth Areas and Urban Transformation. The overall framework is complex given that the approaches are led by different government agencies following different pathways. Further, some areas are identified as both Collaboration Areas and Priority Precincts/Priority Growth Areas, such as St Leonards, Frenchs Forest and Macquarie Park. For these areas, the Department of Planning and Environment (the Department) is the government agency responsible for facilitating interagency engagements. This indicates that different Collaboration Areas are progressed following different approaches, some led by the Commission and some by the Department.

We recommend that the Commission liaise with other state agencies to simplify the framework and provide greater clarity on how the different approaches relate to each other and work together. Importantly, we request that local councils and the community be closely involved during the entire decision-making process, including extensive community consultation prior to the nomination or announcement of urban renewal areas planned with significant transformation.

Housing affordability

Mandated affordable rental housing targets

The draft Plan incorporates affordable rental housing targets as a form of inclusionary zoning. A target of between 5%-10% of new residential floor space would be announced prior to rezoning (a change of land use to residential or an increase in permissible residential development density) so that it can be factored into the development equation. It applies to land within new urban renewal or land release areas identified via a local or district housing strategy, to have current or future need for affordable rental housing. The identification of a target will be subject to development feasibility testing across a nominated area and will be calculated as a proportion of all residential floor space above the existing permissible floor space.

We support the introduction of mandated targets to facilitate effective delivery of affordable housing. In terms of the calculation method, Council would like to reiterate its comments provided on the draft Central District Plan (exhibited between November 2016 and March 2017), requesting that the targets apply to the total development capacity as a result of the proposed upzoning, instead of the additional floor space above the base floor space ratio. Detailed comments on this are included in our submission on the revised draft District Plan.

New models emerging in the private rental market

The draft Plan outlines that improved housing affordability could be largely achieved through continued provision of affordable rental housing, more compact housing and new housing models emerging in the private rental market. The draft Plan notes that over one-third of all households are renting and the percentage of people renting is quickly growing in Greater Sydney. However, the largest providers of rental accommodation are private property investors renting dwellings of variable conditions on short six to 12 month leases. Therefore, to effectively deal with the affordability challenges, the draft Plan encourages exploration of new housing models including a new built to rent model to provide better housing options via purpose-designed rental buildings with good services and management and longer lease terms. We strongly support the investigation of new rental accommodation models to meet the housing needs of low to moderate income households.

The built to rent model, together with student accommodation can play a strong role in providing specialised rental accommodation for specific tenant segments. We therefore recommend further investigation of the need and potential for the planning system to facilitate these new models. Some possible incentives for consideration could be land use permissibility and floor space bonus initiatives, exemption or reduction in development contributions and eligibility for code-based assessment, etc. We recommend that the planning system/legislation be reviewed and updated where necessary, to address, recognise and respond to the emerging development trends. For example, specific land use terms relating to built to rent and student accommodation could be included in the land use tables, to provide greater certainty to potential developers and send a clear

message that these development types are permitted and supported in suitable locations.

Multiple government agencies driving policy on affordable housing

The NSW Government has recently appointed Landcom as an affordable housing delivery agency, to boost affordable housing supply on both private and government owned land. Landcom will release its own targets on the number of new affordable rental homes Sydney needs early next year. As such, we now have three state government agencies driving the affordable housing supply, with the other two being the Commission and the Department. Further to this are local councils that establish their own specific affordable housing policies and programs.

The involvement of various government bodies and agencies in decision making often leads to overlapping or inconsistent policy directions and inefficient use of resources. While we strongly support the initiative taken by the Commission towards improved housing affordability, we recommend that a coordinated approach be pursued for enhanced consistency in policy-making and improved certainty of the supply and delivery of affordable housing. We encourage that the Commission continues to play the key role in advocating innovative measures for improvement and best outcomes.

Retail and office floor space

The draft Plan outlines that there is a significant need for additional retail and office floor space to support Greater Sydney's population growth. To deliver the required floor space, the draft Plan identifies that there will be a need to grow existing centres, in particular strategic centres and supermarket-based local centres and create new centres including business parks and attracting health and education activities into centres.

We understand that supermarket based local centres are important in facilitating residential development, walkable communities and local employment. However, we recommend that centres not currently served by a local supermarket should also be identified for potential growth and renewal, especially those that meet the latent demand and provide a balanced distribution of retail facilities.

The draft Plan seems to place a particular focus on creating new stand-alone office precincts as a response to the increasing floor space demand. However, further initiatives to facilitate office development or office floor space in mixed use buildings in existing local and strategic centres should be widely explored so that more jobs are provided close to home, consistent with the vision for 30-minute cities. Given the competition from residential development for scarce space in centres, relevant planning mechanisms should be explored and considered for certain locations, such as minimum commercial floor space ratio.

Managing conflicts between land uses

The draft Plan highlights that the Eastern City will have an ongoing role in large-scale freight and logistics given the two nationally significant trade gateways and intermodal terminals located in the district. To support the significant growth projected for the trade gateways, the draft Plan notes that it is critical to protect industrial lands from encroachment of non-compatible uses (such as commercial and residential), provide buffer areas to sensitive nearby uses (such as residential), and provide an efficient road and rail freight network. One of the related transport strategies proposed in the draft Plan is to prevent uses generating significant traffic on roads servicing the Port and Airport such as large-scale car based retail and high density residential.

While Council notes the important role of trade gateways, we suggest that the following issues/questions be investigated as part of the finalisation of the Region Plan and the updated Freight and Ports Plan, to ensure minimised impacts on adjacent residential areas:

- mechanisms or actions to implement the buffer area approach. We request that opportunities to create a buffer area (both noise and transport buffer) within the Port land be thoroughly investigated and relevant planning controls be considered to clearly identify the buffer area with prescribed permitted uses;
- additional measures that can effectively address the associated impacts, when the existing residential areas are not sufficiently set away from ports, airports and ancillary uses (e.g. when a buffer zone is not in place); and
- roles of the existing intermodal terminals in the Eastern Harbour City be reviewed and assessed when preparing the updated Freight and Ports Plan, to identify their future roles and capacity to contribute to the freight task.

We stress that appropriate management of the interfaces of industrial areas are becoming more and more important, especially within the context of the planned growth and intensification of the trade gateways and the associated transport of increasing volume of dangerous goods in close proximity to sensitive areas. We note that Port Botany has long-term constraints and pressures due to its proximity to the Eastern Harbour City, and we recommend that the draft Plan take a strategic long term investigation into alternative freight growth options to the south (Port Kembla) linking to the growing intermodal facilities in Sydney's south-west.

Urban tree canopy cover

One of the key approaches towards sustainability proposed in the draft Plan is to plan and deliver green infrastructure, including waterways, urban bushland, urban tree canopy, green ground cover and parks and open spaces, and the Green Grid that connects communities to green infrastructure. These initiatives are supported.

We note however that particular emphasis has been given to increased urban tree canopy as a prioritised strategy to mitigate heat island effect, improve air quality and enhance aesthetic and environmental values. A specific metric is also identified to measure urban area covered by tree canopy.

Tree planting may not be the right answer for all areas and situations, given the associated requirement for sufficient space and specific growing conditions, potential conflicts with infrastructure both above and below the ground, maintenance cost and possible overshadowing impacts on residences. We therefore recommend that a more comprehensive strategy be developed widely exploring and encouraging all possible solutions, in particular innovative design measures, such as rain gardens, green roofs and green walls, to recognise and respond to different environmental conditions and site constraints. Accordingly, the tree canopy metric should also be modified to reflect this.

Provision of public open space

We welcome the two key strategies proposed to enhance and expand public open space, being shared use of existing open space assets by the wider community and exploring opportunities for new open space as part of large urban renewal initiatives.

To achieve these strategies, we note that it is critical to establish specific plans and programs to facilitate shared use of open space currently not available to the general community, such as golf courses and open space in schools.

The draft Plan also sets out a requirement that with the provision of new open space, all residential areas are within 400m of open space and all high density residential areas are within 200m of open space. We understand that this catchment requirement largely applies to areas subject to renewal and transformation, which indicates that established residential areas without major redevelopment potential would not have the equal opportunity for improved access to open space. Further consideration is required to address this issue relating to spatial equity. For example, divestment of surplus government-owned land to local government should be prioritised around areas with a deficiency of quality open space but not subject to future renewal opportunities.

We note that there seems to be a particular focus on the quantity of open space, but not the quality and functionality of individual open space. We recommend that in addition to the catchment requirement, the provision of new open space should be largely guided by a green infrastructure/recreation needs study so that each new open space is appropriately located, sized, designed and equipped to form a valuable asset to the community.

Metrics

As noted, the draft Plan contains 14 metrics proposed as a new initiative to facilitate annual monitoring and reporting on the performance of the Region Plan. This approach will lead to improved transparency to relevant stakeholders and the wider community and is therefore supported by Council.

However, we request further information explaining how these indicators have been developed and why some of the key objectives do not have corresponding metrics. For example, there are no metrics relating to heritage conservation, active transport, biodiversity protection, quantity and quality of open space serving the community and delivery of the Green Grid.

It is therefore recommended that:

- additional metrics be included to address a wide range of objectives;
- where possible, the progress or performance should be measured at the region level as well as the district or local government level, so that areas requiring further improvement and focused assistance can be clearly identified. The data collection method therefore needs to be appropriately established to enable aggregation and disaggregation of data for use at different spatial scales;
- baseline data/information be established as an immediate action to allow comparison over time and monitoring of the impact of new growth, transport services and infrastructure; and
- the Commission consider establishing a range of targets so that the performance can be assessed and monitored against specific pre-set targets. The inclusion of targets will enable effective annual monitoring and therefore enhance the evaluation framework.

Detailed comments on each proposed metric as well as additional metrics recommended for the Commission's consideration are included in the attached table.