

Attachment 2

Draft Greater Sydney Region Plan

Submission Table – Specific Comments on Metrics, Objectives and Actions

Theme 1 Infrastructure and Collaboration	RCC Comment
Direction 1 A city supported by infrastructure	Council supports the inclusion of the theme of Infrastructure and Collaboration in the Region and District plans.
Metrics	Supported in principle. However, more work is required to investigate improved alignment of the local, state and GSC mechanisms to link growth with infrastructure. This metric could be refined by including a measure of the delivery of infrastructure according to these plans (e.g. via monitoring collection and expenditure of funds), in addition to measuring the preparation of infrastructure plans.
1 Number of land use plans supported by infrastructure plans (NSW Department of Planning and Environment, Greater Sydney Commission, Councils)	
Objectives	
1 Infrastructure supports the three cities	The concept/vision for three cities is supported.
2 Infrastructure aligns with forecast growth – growth infrastructure compact	<p>The alignment of infrastructure planning and delivery with growth is critical and the concept of Growth Infrastructure Compacts (GIC) is supported.</p> <p>We encourage the GSC to monitor and provide feedback of the progress and outcomes of the GIC being piloted at GPOP, and consider the extension of this program to other priority Collaboration Areas identified for 2017- 2018, to provide a strong foundation of strengthened relationships and coordinated planning.</p>
3 Infrastructure adapts to meet future needs	We support the acknowledgement of the impact of rapidly changing technology and the need to adapt infrastructure supply accordingly.
4 Infrastructure use is optimised	Supported, in particular the proposed strategy to develop adaptive and flexible regulations to allow decentralised utilities.

Direction 2 A collaborative city	
Metrics	Supported. We support formal identification of the Randwick Health and Education Precinct as a Collaboration Area and the place-based approach to planning for Collaboration Areas.
2 Proportion of agreed outcomes achieved in Collaboration Areas	
Objectives	As above.
5 Benefits of growth realised by collaboration of governments, community and business	
Actions	As above.
1 Identify, prioritise and deliver Collaboration Areas (Greater Sydney Commission)	

Theme 2 Liveability	RCC Comment
Direction 3 A city for people	
Metrics	Undertaking community survey itself is not a performance indicator. We recommend that more specific measurable metrics be identified, with source data collected from the annual survey. Possible metrics for consideration could be length of wait time for public hospital patients to receive non-urgent health services, number of schools and universities with facilities shared by the community, etc.
3 Annual survey of community sentiment	
Objectives	Supported.
6 Services and infrastructure meet communities' changing needs	
7 Communities are healthy, resilient and socially connected	
8 Greater Sydney's communities are culturally rich with diverse neighbourhoods	
9 Greater Sydney celebrates the arts and supports creative industries and innovation	
Direction 4 Housing the city	
Metrics	
4 Number of councils on track to deliver housing targets	Supported.

5 Number of councils with schemes that implement Affordable Rental Housing Targets	We recommend that this metric be strengthened and changed to "Number of affordable rental housing delivered by affordable rental housing schemes".
Objectives	
10 Greater housing supply	Recommend that the objective be changed to "Greater housing supply in right locations", to recognise that not all areas are suitable for significant development. Housing supply is largely location-based, with different housing types provided in different locations to reflect the varying local characters and market conditions.
11 Housing is more diverse and affordable	Supported.
Actions	
2 Prepare housing strategies (Local Government)	Supported.
3 Develop 6–10 year housing targets (Greater Sydney Commission + Local Government)	Supported.
4 Work with the NSW Department of Planning and Environment to implement Affordable Rental Housing Targets (Greater Sydney Commission)	Supported. We seek further clarification as to who will be responsible for overseeing and monitoring the implementation of the Affordable Rental Housing Targets. A streamlined framework needs to be developed so that SEPP 70, Affordable Rental Housing SEPP and any new mechanisms to be introduced to enable the Targets could complement each other and work together towards aligned outcomes. We request the ongoing monitoring of the effectiveness of existing state planning policies.
Direction 5 A city of great places	
Metrics	<ul style="list-style-type: none"> • There are no metrics relating to heritage conservation. • We recommend that "cycling" be also included in the following metrics.
6 Percentage of dwellings within walking distance of a local or strategic centre	Living in walking distance of a major centre is not a critical criterion when people choose where to live. In fact, many people do not prefer living close to centres, given the associated noise, traffic and parking impacts. Also given that there is a related metric under the Direction A Well-connected City (Metric 9), we recommend that this metric be changed to "percentage of

	<p>dwelling within walking and cycling distance of a local centre”.</p>
7 Percentage of dwellings within walking distance of open space	<p>It is common perception that short distance to a park often leads to pleasant living environment and higher property values. It is therefore a good indicator measuring liveability. For improved clarity, we recommend that the metric be modified to “percentage of dwellings within walking and cycling distance of a publicly accessible open space (such as parks, reserves, beaches, etc.)”.</p>
Objectives	
12 Great places that bring people together	Supported.
13 Environmental heritage is conserved and enhanced	<p>Council supports the recognition of the importance of heritage conservation and sympathetic adaptive re-use and innovative interpretation of heritage.</p> <p>As noted, we recommend that a heritage-related metric be developed, such as:</p> <ul style="list-style-type: none"> • Number of councils carrying out a heritage study and/or an Aboriginal heritage study • Number of heritage items listed and number of councils with Statement of Significance prepared for all heritage items • Number of councils with a heritage DCP • Number of councils with educational and promotional programs, such as incentives or funding schemes to encourage preservation and adaptive re-use of heritage and contributory buildings <p>A general comment relating to this objective is that within the context of urban renewal, there seems to be growing pressure for demolition of heritage buildings to give way to new development. This reflects an underlying conflict between some of the objectives. Clear policy directions are therefore required to guide Council’s decision-making, e.g. assessment of planning proposals and development applications.</p>

Theme 3 Productivity	RCC Comment
Direction 6 A well-connected city	
Metrics	Metrics relating to usage of active transport should also be considered.
8 Percentage of dwellings located within 30 minutes by public transport of a metropolitan city centre/cluster	
9 Percentage of dwellings located within 30 minutes by public transport of a strategic centre.	
Objectives	
14 A metropolis of three cities – integrated land use and transport creates walkable and 30-minute cities	Supported. The vision should be broadened to also consider 30-minute access by walking and cycling. Safe separated cycle paths are an economical and space efficient form of infrastructure, and a potentially more efficient and flexible way to increase transport capacity/access to centres within a spatially constrained environment.
15 The Eastern, GOP and Western Economic Corridors are better connected and more competitive	No specific comment.
16 Freight and logistics network is competitive and efficient	Supported. See comments in the main submission for detail.
17 Regional transport is integrated with land use	Regional transport should support the satellite roles of the adjoining Illawarra and Central Coast regions, in relation to Greater Sydney.
Actions	
5 Collaborate to deliver the Greater Parramatta and the Olympic Peninsula (GOP) vision (Greater Sydney Commission)	No specific comment.
6 Develop a growth infrastructure compact for GOP (Greater Sydney Commission)	The concept of the GIC is supported and is recommended to be expanded to other Priority Collaboration Areas.
Direction 7 Jobs and skills for the city	
Metrics	
10 Growth in jobs in the following metropolitan and strategic centres, Blacktown, Campbelltown - Macarthur, Greater Parramatta, Greater Penrith, Harbour CBD, Kogarah, Liverpool, Macquarie Park and Western Sydney Airport / Badgerys Creek Aerotropolis.	Query why Randwick Health and Education Strategic Centre is not identified here. Council monitors employment growth in the precinct via its Community Strategic Plan.
11 Change in number of people employed locally (five year).	Clarification is sought whether this applies to employment self-containment within a LGA, or within a certain distance of the closest

	strategic or metropolitan centre.
Objectives	
18 Harbour CBD is stronger and more competitive	No specific comment.
19 Greater Parramatta is stronger and better connected	
20 Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City	
21 Internationally competitive health, education, research and innovation precincts	Supported. Note that a joint submission has been prepared from the core stakeholders of the Randwick Health and Education Precinct.
22 Investment and business activity in centres	<p>We note that Maroubra Junction/Eastgardens is identified as a strategic centre and support Maroubra Junction as the focus of the extension of the CBD and South East Light Rail to Maroubra Junction in the short term.</p> <p>The recognition of the key role of local councils in identifying the local hierarchy of centres within the Local Centre classification is largely supported.</p>
23 Industrial and urban services land is planned, protected and managed	We support that all industrial zoned land in the Eastern Harbour City should be protected from conversion to residential and mixed-use development.
24 Economic sectors are targeted for success	Supported.
Actions	
7 Support the growth of the Camperdown-Ultimo Collaboration Area (Greater Sydney Commission)	No specific comment.
8 Collaborate to deliver the Western Sydney City Deal (Australian Government, NSW Government, Local Government)	No specific comment.
9 Facilitate whole-of-government place-based outcomes through Collaboration Areas for targeted strategic centres, including Liverpool, Greater Penrith and Randwick (Greater Sydney Commission)	Supported. See comments on Metric 2.
10 Review industrial and urban services land in the Central River City and the South West and North West Priority Growth Areas (Greater Sydney Commission)	No specific comment.

Theme 4 Sustainability	RCC Comments
Direction 8 A city in its landscape	General comments: We request that a comprehensive register be established to identify natural resources, with funding allocated to protect and improve the coast, waterways and remnant bushland.
Metrics	We recommend that the environmental indicators developed to facilitate the State of the Environment reporting be considered for reference.
12 Proportional increase in Greater Sydney covered by urban tree canopy.	<p>We suggest that the metric be modified to recognise that there are additional effective measures to mitigate the heat island effect and provide environmental benefits, such as rain gardens, green walls and green roofs.</p> <p>Additional indicators that could be considered to address the objectives below are:</p> <ul style="list-style-type: none"> • EPA beachwatch data ratings for beaches and harbours • Community streamwatch data for urban waterways • Extent and condition of protected natural areas
Objectives	
25 The coast and waterways are protected and healthier	Marine protected areas should be recognised and monitored for effectiveness.
26 A cool and green parkland city in the South Creek corridor	No specific comment.
27 Biodiversity is protected, urban bushland and remnant vegetation is enhanced	<p>We note that it is critical to protect urban bushland given its direct interfaces with human activities. We however seek clarification as to what the mapped "Protected Natural Areas" include (P135). It seems to be inconsistent with the "Terrestrial Biodiversity "mapping layer of the Randwick LEP 2012. Further, we recommend that the network of habitat corridors be also recognised and included in the mapping system.</p> <p><i>Note: Greater Sydney Local Land services has GIS mapping layers on the SCCG/SSROC habitat corridors for the next four years.</i></p>
28 Scenic and cultural landscapes are protected	The draft plan should recognise the significant public view to and from the coast and the effective protection achieved through planning controls applying to the identified Foreshore Scenic Protection Area.

29 Environmental, social and economic values in rural areas are maintained and enhanced	The plan needs to recognise the significant value of urban market gardens within Greater Sydney such as the Chinese Market Gardens at Phillip Bay.
30 Urban tree canopy cover is increased	The plan needs to recognise that not all areas of Sydney are suitable for growing trees. For example, in exposed sandy coastal areas, other vegetation provides equal value as trees for mitigating heat island effect and improving and maintaining biodiversity. See detailed comments in the main submission.
31 Public open space is accessible, protected and enhanced	Supported. Refer to the main submission for detail.
32 The Green Grid links parks, open spaces, bushland and walking and cycling paths	Supported. We recommend that the Priority Green Grid Corridors be broadly extended, for example, the Eastern Beaches Coastal Walkway should also be included as a priority corridor. Tailored actions and directions need to be identified to protect and enhance these priority corridors. It is also recommended that interagency working groups be established to develop an action plan for the Green Grid project.
Actions	
11 Develop and implement the South Creek Corridor Plan. (Infrastructure NSW)	No specific comment.
12 Deliver the open space toolkit. (Government Architect NSW)	Supported.
Direction 9 An efficient city	
We stress that transportation is one of the primary sources for greenhouse gas emissions. Specific objectives and metrics aiming for reduced emissions from transportation therefore should be included.	
Metrics	
13 Number of precincts with low-carbon initiatives	Supported. Other indicators proposed for consideration include: <ul style="list-style-type: none"> • water consumption (change) over Greater Sydney for residential, commercial and industrial uses • energy consumption (change) over Greater Sydney for residential, commercial and industrial uses • proportional change in greenhouse gases (2010 baseline) • proportional change in non-potable supply (2013 baseline) • proportional change in waste volumes diverted from landfill (2010 baseline) • proportional change in recycling, garden waste & food organics (2010 baseline) • proportional change in public transport patronage (2010

	<ul style="list-style-type: none"> baseline) proportional change in cycling to work (2010 baseline) proportional change in walking to work (2010 baseline)
Objectives	
33 A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change	Supported. The higher BASIX targets should widely apply to areas accommodating significant residential and employment growth, such as Priority Precincts/Growth Areas and Collaboration Areas, to ensure new development contributes to the net-zero emission target as recommended in Kinesis 2017 Net Zero Emission Report to the GSC.
34 Energy and water flows are captured, used and re-used	Supported.
35 More waste is re-used and recycled to support the development of a circular economy	Supported.
Direction 10 An resilient city	
Metrics	
14 Number of local government areas undertaking resilient planning.	The following metrics are recommended for consideration: <ul style="list-style-type: none"> Number of resilient actions implemented (as identified in relevant strategies) Proportional change of economic costs attributed to natural disasters within Greater Sydney (2010 baseline) Number of people exposed to heatwaves and extreme heat events in Greater Sydney (2010 baseline)
Objectives	
36 People and places adapt to climate change and future shocks and stresses	Supported. We note that flood risk, peak energy demand outages and low mains water pressure risks should be considered as key factors driving resilient planning for these decentralised energy and water systems. Funding mechanisms to support related infrastructure also need to be developed.
37 Exposure to natural and urban hazards is reduced	
38 Heatwaves and extreme heat are managed	
Implementation	
Actions	
13 Work with the NSW Department of Planning and Environment to develop its role in peer reviewing key land use and infrastructure plans prepared by NSW Department of Planning and Environment to provide assurance to the community that robust planning is being undertaken across	Supported.

Greater Sydney consistent with the directions, priorities and objectives of the District and Region Plans (Greater Sydney Commission)	
14 Report on actions (Greater Sydney Commission)	