

Attachment 3

Revised Draft Eastern City District Plan Randwick City Council Draft Submission

Introduction and Overview

The Revised draft Eastern City District Plan has been prepared to give effect to the draft Greater Sydney Region Plan. Relevant Objectives, Strategies and Actions from the draft Greater Sydney Region Plan are embedded in each of the Planning Priorities under each of the key themes Infrastructure and Collaboration, Liveability, Productivity and Sustainability, to integrate the two plans. The same metrics in the draft Greater Sydney Region Plan will be used to monitor the performance of the revised District Plan.

The Council commends and supports these efforts to better integrate the two plans and the inclusion of metrics to monitor and report on their effectiveness. Comments in relation to the metrics have been provided in Council's submission on the draft Greater Sydney Region Plan.

In relation to the key themes of the draft plans, the Council strongly supports a separate chapter on 'infrastructure and collaboration' upfront in the plan which emphasises the importance of infrastructure and collaboration to the delivery of the Plans' actions and planning priorities. There are also several specific planning priorities/ actions in the revised district plan in which the Council is pleased to see strong leadership and direction from the Commission. These include:

- The identification of the Randwick Education and Health Collaboration Area as a priority collaboration area;
- The introduction of Affordable Rental Housing targets;
- A strong focus on integrating land use and transport planning to deliver a 30 minute city; and
- Precinct based initiatives to increase renewable energy, and energy and water efficiency in targeted growth areas.

It is noted that on finalisation of the district plans, councils are required to update their local environment plan to give effect to the district plan, within three years of the district plans being finalised.

Council also acknowledges and commends the Commission on the opportunity for ongoing involvement in the development of the revised District Plan; and we look forward to the Commission's continued leadership and collaboration to deliver a strong vision and plan for the Eastern City District.

The following submission outlines key aspects of the draft Plan (under each key theme) noting actions and planning priorities the Council supports, and suggestions for updating and refinement. A separate table attached reviews the specific actions in the plan.

Infrastructure and collaboration

As a general comment on this priority, Council supports the Greater Sydney Commissions' (the Commission) commitment to integration of planning for growth and land use outcomes in line with Infrastructure, and we strongly support its high profile expressed in the District Plans. Council supports the Plan's identification of the role of multiple levels of government and state-owned corporations in achieving the actions. We suggest that clearer delineation of the levels of responsibility across each organisation is

needed, and that mechanisms/outputs are included indicating how actions will be achieved (eg: the role of the Infrastructure Priority list, and Infrastructure Plans for Collaboration Areas). Clarity on these matters is important for local government which is tasked with giving effect to the District Plan in the local planning framework and LEPs.

Growth infrastructure compact model

The Council requests the Commission to consider applying the Growth Infrastructure Compact Model (being piloted in Greater Parramatta and the Olympic Peninsula) to the Randwick Education and Health Collaboration Area, given the significant government investment in this area to date and in recognition of its economic significance.

In relation to 'Planning priority E2 – working through collaboration', we support the Randwick Health and Education Strategic Centre being identified as a Collaboration Area, and its prioritisation to deliver a Place Strategy and Infrastructure Plan over the next 12 months. However, we request that a specific action be included on the need for an on-going involvement by the Commission (past the 12 month timeframe on the delivery of the collaboration agreement) to ensure the collaboration agreements/ areas are in line with the Greater Sydney Commission's vision, objectives and/or planning priorities for these areas, and allow follow up on implementation of the Collaboration Area's plans.

Infrastructure funding/ Value capture

The Council requests that the Commission with the Department of Environment and Planning (DPE) urgently review the local infrastructure contributions framework.

Given that the district plans are the 'bridge between regional and local planning', the Council requests that a specific action be included within the revised District Plan which calls on the DPE to urgently review the local development contributions framework. This would include a review of the maximum levy payable under s94A of the EP&A Act (which has been set at 1% since 2006); and provision of support to local councils wishing to implement value capture schemes within the local planning framework.

Liveability

In general, the Council supports the four liveability planning priorities to guide growth and change including the need to provide for essential social infrastructure and to facilitate healthy, creative and culturally rich connected communities; the recognition of the importance of respect for heritage; and importantly an affordable rental housing target. However, the following identifies some key issues and comments for consideration by the Commission.

Housing supply and priority precincts

Council notes that no changes have been made to the dwelling demand projections for Greater Sydney and the district; and no changes were made to the 0-5 year housing targets. A preliminary capacity analysis across the Randwick LGA notes that the 0-5 year housing target can be accommodated within known and approved development projects and existing development capacity under the local planning framework.

The Council supports the preparation of a local housing strategy to inform the medium to long term housing targets (which are yet to be determined) in consultation with the wider community. However, the Council requests the Commission to include as part of any housing supply target, an affordable rental housing target also, to ensure affordable rental housing is delivered as part of the overall housing supply, rather than apply only

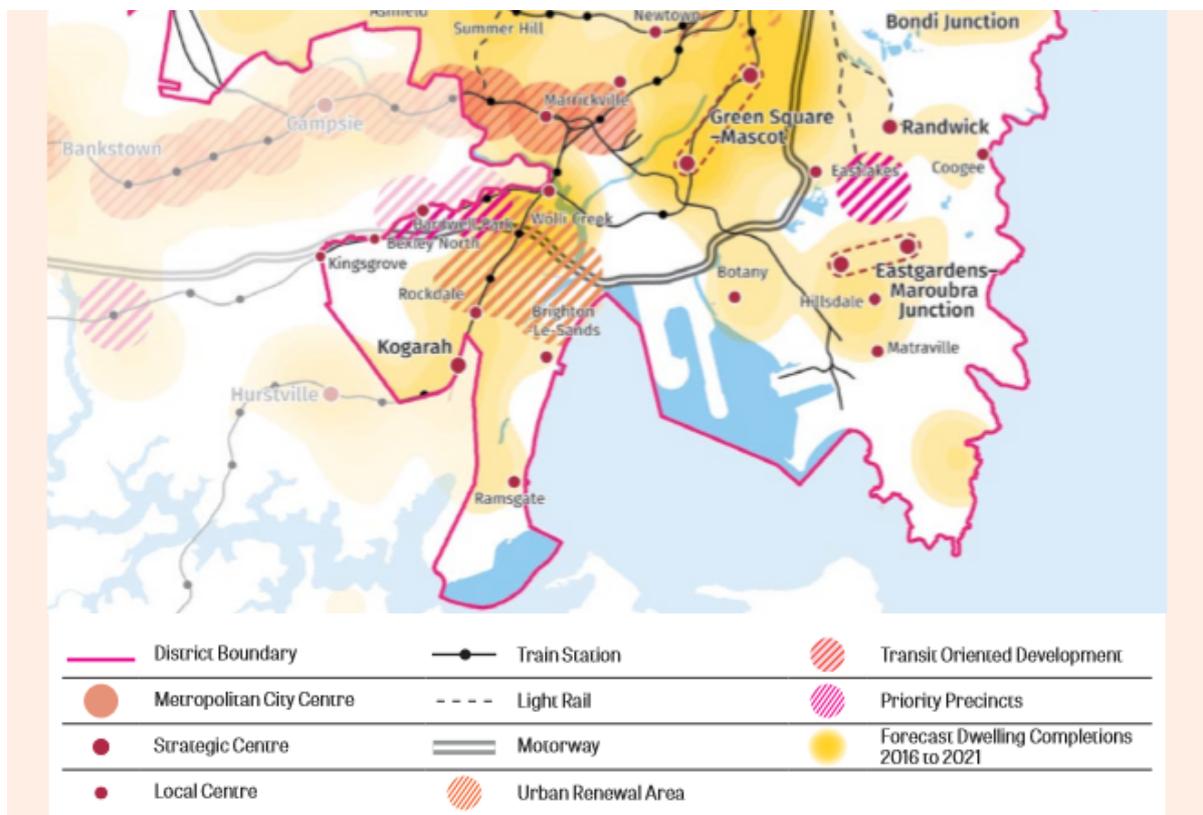
as individual developments occur. As recent research¹ from ANU demonstrated that simply increasing the supply of housing will not make housing more affordable, especially for those on low to moderate incomes. A more targeted approach is needed to address the need for affordable rental housing.

Priority precincts

The Council does not support the priority precinct as identified on Figure 13 of the revised draft Eastern City District Plan which identifies a priority precinct as a circle somewhere between south Kingsford and Maroubra (shown below). This is on the basis that the priority precinct is not within or close to a strategic centre, nor is it aligned with any committed transport infrastructure.

The Council requests that the Commission review the need to identify a location for a priority precinct in Randwick City and instead consider the Anzac Parade corridor as a longer term urban renewal opportunity (as previously identified in *A Plan for Growing Sydney*). This will enable future housing supply in Randwick City to be evaluated as part of a comprehensive Local Housing Strategy prepared by Council, and will better align with the *draft Future Transport Strategy* investigations into to mass transit and extension of the light rail in this vicinity within a 10 to 20 year timeframe.

In addition, the Council requests that the Commission consider identifying the NSW Land and Housing Corporation as a key stakeholder of future housing supply opportunities in Randwick City and specifically its housing estates along the Anzac Parade corridor as potential 'urban renewal areas' given that these estates are major land holdings in the LGA, are more than 40 years old and are in desperate need of renewal to better meet current housing need.



Revised draft eastern district plan (Figure 13)

¹ <http://www.abc.net.au/news/2017-11-20/house-price-growth-based-on-undersupply-myth-anu/9167688>

Affordable rental housing targets

Council supports measures to adopt an affordable rental housing target, as a form of inclusionary zoning and calls on the Minister of Planning, the Commission and the DPE to implement the target as a matter of urgency.

In addition, we request that the target should apply to the total development capacity (as a result of the rezoning) not just the planning uplift. This would be a much more effective planning policy in delivering much needed affordable rental housing and importantly (when compared to international best practice) can be delivered.

Other key points to be considered in finalising the affordable rental housing target scheme include recommendations to:

- ensure the dwellings / floor space are dedicated as affordable rental housing in perpetuity, either to a community housing provider and/or council to be used for affordable housing.
- enable all councils to 'opt in' to SEPP 70, to provide the local planning framework for councils to allow the levying of contributions for affordable rental housing;
- enable councils to set their own affordable rental housing target (between 5%-10%) for each affordable rental housing scheme proposed supported by a feasibility assessment.
- expand the eligibility criteria of potential housing recipients to moderate income households. As outlined in Council's previous submission to the draft central district plan, moderate income household groups are essential in supporting affordable rental housing models as the higher rents these households are able to pay help cross subsidise the rents that the very low and low income households can pay. Moreover, it supports the objective of diverse neighbourhoods and communities.

In addition, the Council requests the Commission to include reference to affordable rental housing (under Priority E4 – 'diverse neighbourhoods') as a fundamental component towards delivering 'diverse neighbourhoods' as outlined on pages 30-31 in the draft plan.

Aboriginal people

The Council welcomes and supports an action within the revised draft Eastern City District Plan which aims to strengthen the self determination of Aboriginal communities with LALC as they relate to land use planning. The Council acknowledges existing programs, such as the Jawun secondees program supported by the Commonwealth Government under its 'Empowered Communities' program. Each year Local Aboriginal Land Councils under the NSW Aboriginal Land Rights Act (1983) are required to submit a Community, Land and Business Plan to the NSW Aboriginal Land Council. The Plan is designed with support from the Jawun secondees (including skilled people from Australia's leading companies and government agencies).

The La Perouse LALC each year engages its membership to have input into its Community, Land and Business plan and to raise questions on the objectives of the plan. In previous years members have been very vocal against the sale of land assets but recently have been cautiously considering joint land development proposals.

The Council also supports the Land Council's local economic development initiatives such as 'Kamay' – Beach equipment Hire at Yarra Bay; and has provided advice to the Land Council on a number of land use planning and environmental issues.

Heritage

Planning Priority E6 in the District Plan is intended to give effect to three Objectives from the Greater Sydney Region Plan (p.24). Planning Priority E6- Creating and renewing great places and local centres, and respecting the District's heritage, relates to Objective 13 Environmental heritage is conserved and enhanced (p.44). The Council supports the recognition of the importance of respect for heritage and commends the inclusion of this Planning Priority.

The Planning Priority E6 chapter includes separate discussion of Streets and places, Local centres and Heritage and character (p.48). The District Plan recognises that heritage and history are important components of local identity and area important attributes of great places, but heritage has not been recognised for its intrinsic value. Not only is heritage an essential element of local identity and great places, it embodies our shared history and connects people to their past.

The Heritage and character section recognises that a wide variety of local heritage items and heritage streetscapes also form part of the character of centres throughout the District (p.48). In addition to the term "heritage streetscapes", the term "heritage conservation area", which is a term recognised in NSW planning legislation, should be included. The recognition of these existing heritage places in the District Plan is commended.

Five Actions are identified in order to achieve Planning Policy E6 (p.49). Conserving and enhancing environmental heritage is to be achieved by engaging with the community early in the planning process to understand Aboriginal, European and natural heritage values, and conserving and interpreting Aboriginal, European and natural heritage to foster distinctive local places (Action 18). Delivery of great places is also facilitated through encouraging contemporary interpretation of heritage where possible (Action 17). The District Plan recognises that conservation and interpretation of places and values of heritage significance is required, as well as sympathetic adaptive reuse of heritage (p.48). The recognition of the importance of conservation and opportunities for high quality adaptive re-use is supported.

There are no Metrics however, relating to respecting the District's heritage and therefore no specific or measurable criteria by which to judge success in achieving the Planning Policy. This is a particular useful measure to include in respect to the potential for conflict between Planning Priorities of increasing jobs and housing supply within built up areas. For example, Planning Priority E8 - Growing and investing in health and education precincts and the Innovation Corridor (p.58) includes discussion of the Randwick Collaboration Area (p.64). This discussion includes a focus on integrating key surrounding centres and facilities including Randwick Junction, The Spot, the National Institute of Dramatic Art and Royal Randwick Racecourse. With the exception of NIDA, all these centres/facilities are within heritage conservation areas, with many heritage items. The unique location, place qualities and heritage values are a key asset of the Collaboration Area, and it is recommended these are reflected as considerations in future planning.

Productivity

In general, the Council supports the seven planning priorities towards improving productivity across the Eastern City District and commends the Commission on the strong focus in the draft plan to better integrate land use and transport planning to deliver a 30 minute city. Other key issues and/or recommendations for consideration in relation to the theme of Productivity are outlined below.

Randwick Collaboration area

The Council supports the identification of Randwick as a priority Collaboration Area and notes that a collaboration agreement is currently being prepared. The Council supports the notion that the Randwick Collaboration Area has the potential to become an Innovation District and requests that the Commission maintain an ongoing role (post the 12 month commitment to delivering on the collaboration agreement) in this evolution.

Additional comments on the Randwick Collaboration Area are provided in a separate joint submission by the core precinct stakeholders of NSW Health Infrastructure, the University of NSW and Randwick City Council, on common priorities and interests.

Port Botany/ industrial lands/ growing international trade gateways

The Council notes that the new Freight and Ports Plan is yet to be released. As such it is difficult to comment on the actions in relation to freight and Port Botany without the knowledge of the wider implications the Freight and Ports Plan may have including updated freight trends and priorities.

Despite this, given that the Greater Sydney Region Plan is a long term strategic plan we call on the Commission to investigate the future long term needs for container freight for Greater Sydney, and assess the role of the Port considering that the area is severely constrained, surrounded by sensitive uses (i.e residential); and the difficulty in moving freight into and out of this area. Moreover, the growth of the Western City and second Sydney Airport, and the increasing concentration of freight intermodal and distribution centres in the south-west of Sydney suggests there are benefits in growing the capacity of major freight facilities in areas with the potential for better access to western Sydney.

The Council supports the draft Plan’s emphasis on the protection of industrial lands from rezoning to residential uses.

Jobs and strategic centres

The revised draft plan identifies two areas in Randwick City with a job target:

1. Randwick Collaboration Area

	2016 Estimate	2036 Baseline Estimate	2036 Higher Estimate
Randwick	22,800	32,000	35,500

Source: Draft Eastern City District Plan pg. 64

2. Eastgardens – Maroubra Junction strategic centre

	2016 Estimate	2036 Baseline Estimate	2036 Higher Estimate
Eastgardens – Maroubra Junction	6,900	8,000	9,000

Source: Draft Eastern City District Plan pg. 79

We note that the revised District Plan no longer contains employment growth targets for Port Botany while the targets for the Randwick Collaboration Area and Eastgardens – Maroubra Junction strategic centre have not changed since the previous district plans were published (Nov. 2016). The revised District Plan notes that the job targets aim to inform agencies of anticipated growth and are not to be seen as maximum targets. However, it is unclear as to how local planning is required to respond as there is no formal action applied to addressing employment targets in the draft plan. As such, the Council seeks clarification on how local planning is to respond.

In relation to Eastgardens-Maroubra Junction, Council acknowledges the actions in the revised District Plan to investigate the current and potential future economic and social

roles of the combined centre, and implications for land use and transport planning. Currently the two centres operate independently, with contrasting place qualities, and a different mix of uses and roles within the local community. As a new strategic centre, with the primary economic activity separated into two nodes, detailed investigations are necessary to identify a cohesive economic role, and the potential for the range of economic activities, land use mix, supporting infrastructure and public domain to work together to complement and enhance the environment and create a vibrant and attractive place.

In response, the Council requests the Commission to consider preparing, in conjunction with local councils, an economic development strategy for the Eastern City District which would consider the relationship of all the strategic centres, collaboration areas, innovation districts and the visitor economy.

In relation to the Randwick Collaboration Area, detailed planning is underway towards establishing a Collaboration Agreement for the area, which will deliver a place strategy and infrastructure plan to support the economic growth of the area.

Sustainability

The Council strongly supports the actions under E19 on reducing carbon emissions and managing energy, water and waste efficiently, and supports actions to introduce low-carbon precincts for targeted growth areas. However, the Council believes that these actions could be strengthened by introducing higher BASIX targets, encouraging green walls and rooves; and implementing innovative waste systems for these areas which are discussed below.

Higher BASIX targets

Since the introduction of BASIX in 2004, the Eastern Suburbs region has seen an increasing trend in over-compliance, meaning that new developments are achieving higher BASIX targets than they are required to comply with. In 2013/14, approximately 25% of new dwellings over-complied with BASIX Energy targets by 6 or more points and 17% over-complied by 8 or more points. This demonstrates that the legislation is not keeping up with consumer preferences and the rate of new technologies which are making it easier to comply with the existing BASIX targets.

As such, the Council suggests that the Commission consider higher BASIX targets beyond those recently introduced, (as outlined in the table below and as recommended by the findings of a report 'Exploring Net Zero Emissions for Greater Sydney') to apply for low carbon precincts in targeted growth areas, collaboration areas and priority precincts.

BASIX Energy 75 for single dwellings	BASIX Energy 65 for low rise	BASIX Energy 60 for mid rise	BASIX Energy 55 for high rise.
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Source: Kinesis (October 2017) 'Exploring Net Zero Emissions for Greater Sydney'

Green walls, roofs and vegetation

As urban high rise development increase replacing single residential dwellings there is an increasing need to incorporate open space into development to ensure no loss in vegetation cover in these areas. These green open spaces reduce the likely temperature rise expected with new development and provides a cool escape for residents during heat waves.

In addition to ground based landscaping, green walls and roofs can be included in a design strategy for a development. This can improve the thermal performance of a building and

can contribute to lower energy use and greenhouse gas emissions. Externally it can result in a reduction of the urban heat island effect while increasing urban biodiversity and food production, and can be a suitable solution especially in high density areas with limited open space or street tree capacity. As an added benefit these have been scientifically proven to improve urban air quality through removal of fine particles, carbon dioxides and volatile organic compounds.

The trees, shrubs and grasses are natural cooling mechanisms- the evaporation of water from the surface of the leaves cool the surrounding air while also have the ancillary benefit of preserving the biodiversity.

The Council in August of this year, hosted a green walls and roofs symposium which looked at best practice both internationally and within Australia on implementing green walls and roofs within the built environment; and is currently developing a green walls and roofs policy. As such, we request that the Commission introduce actions on 'green walls and roofs' to apply in low carbon precincts within the revised district plan.

Waste

Innovative waste solutions such as decentralised waste facilities and services, should be considered in the future planning of low carbon precincts in priority growth areas, priority precincts, collaboration areas and urban renewal precincts; and be considered as essential infrastructure in relation to development contributions to help fund and implement these systems.

Energy from waste is a way of seeing waste as a resource and not just as an invaluable by-product. Anaerobic digestion produces energy from waste and involves the decomposing of organic material to create biogas that can be converted into electricity or gas for the grid. Anaerobic digestion is for garden, household and commercial organic waste and even sewage sludge. This process results in a diversion from landfill of 40-70% of waste. Anaerobic digestion is the most simple and cost effective form of energy from waste and can be used on a precinct scale to decentralise the management of waste and reduce the costs and associated impacts of transporting waste long distances to large scale treatment facilities. The Commission needs to investigate ways to reduce barriers to establishment of local small scale waste processing facilities like energy-from-waste and organic waste facilities; and to promote Public Private Partnerships (PPP) in development of waste management facilities using advance technologies.

Council seeks stronger targets and policy guidance on waste and waste management facilities and services, particularly for low carbon precincts. We note that the Kinesis net zero emission report 2017 recommends Increase waste diverted from landfill to 85% which is 10% higher than the current Waste Avoidance and Resource Recovery Strategy 2022 target; and as such we call on the Commission to consider introducing a similar target.

Implementation

The Commission is to report annually to the NSW Government on the metrics of the Greater Sydney Region Plan. The Council requests that the Commission has an ongoing role in monitoring the progress and growth of the Randwick Collaboration Area.