

Attachment 4

Draft Revised Eastern City District Plan – Submissions Table

Theme/Planning Priority/ relevant action	RCC Comment
Infrastructure and collaboration	
Planning Priority E1 Planning for a city supported by infrastructure	
Actions	
1. Prioritise infrastructure investments to support the vision of a metropolis of three cities	Supported.
2. Sequence growth across the three cities to promote north-south and east-west connections	Supported.
3. Align forecast growth with infrastructure.	Supported.
4. Sequence infrastructure provision using a place-based approach.	Supported.
5. Consider the adaptability of infrastructure and its potential shared use.	Supported.
6. Maximise the utility of existing infrastructure assets and consider strategies to influence behaviour changes, to reduce the demand for new infrastructure, including supporting the development of adaptive and flexible regulations to allow decentralised utilities	Supported.
Planning Priority E2 Working through collaboration	
Actions	
7. Identify, prioritise and deliver Collaboration Areas	Supported. However, suggest to include 'monitor' – there is a need for the GSC to ensure the ongoing collaboration of these key stakeholders in these areas. The description of the Randwick Health and Education precinct is not reflective of the signatories of the collaboration agreement/key stakeholders. This would include Health NSW, Randwick City Council and UNSW and for consistency, the description should reference these key stakeholders.
<i>Suggest additional actions on the responsibility of the DPE to work with councils and other agencies to deliver on priority growth areas and priority precincts tied to infrastructure. The DPE also needs to support councils wishing to implement innovative place based infrastructure funding schemes based on value capture</i>	The previous draft district plan made specific mention on the use of value capture schemes as a mechanism to fund infrastructure. To date, the DPE has not come to a policy position on the use of value capture schemes embedded in the local planning framework for targeted areas of growth including a much needed review of the maximum levy payable under s94A development contributions. There needs to be greater support for Councils

<i>and/or an increase to the maximum levy payable under s94A particularly where they are supported by a strong evidence base including financial feasibility assessment.</i>	wishing to implement local infrastructure funding schemes, especially where they are shown to be feasible.
--	--

Theme/Planning Priority/ relevant action	RCC Comment
4. Productivity	
Planning Priority E7 Growing a stronger and more competitive Harbour CBD	
Actions	
22. Prioritise: a. public transport projects to the Harbour CBD to improve business-to business connections and support the 30-minute city b. infrastructure investments which enhance walkability and cycling, particularly those focused on access to the transport network, and within five kilometres of any strategic centre or 10 kilometres of the Harbour CBD.	Support the use of the 30 min city concept as a means to integrate land use and transport planning strategies, while also improving walkability and cycling.
23. Strengthen the international competitiveness of the Harbour CBD and grow its vibrancy by: a. further growing an internationally competitive commercial sector to support an innovation economy b. providing residential development without compromising the objectives for commercial development c. providing a wide range of cultural, entertainment, arts and leisure activities d. providing for a diverse and vibrant night-time economy, in a way that responds to potential negative impacts.	Noted.
24. Review the current planning controls and create capacity to achieve the job targets for the Harbour CBD.	Noted.
Planning Priority E8 Growing and investing in health and education precincts and the Innovation Corridor	
25. Facilitate an innovation corridor that: a. provides access to a sufficient supply of affordable and scalable spaces b. promotes co-location and increased business-to-business interaction c. connects with events spaces d. delivers a high amenity, highly walkable and safe corridor e. has access to affordable, diverse and multi-purpose housing options	Supported. Innovation districts need to contain economic, physical and networking assets. When these are combined they create an 'innovation ecosystem' of people, place and businesses where ideas and growth can accelerate. All tiers of government can play a crucial role in fostering innovation. Local government can implement strategies focussed on increasing walkability, vitality, liveability as well as partnerships with institutions. While we note that this innovation corridor is not in Randwick City Council

Theme/Planning Priority/ relevant action	RCC Comment
f. supports a strong night time economy	<p>we support a role of the Randwick Health and Education Precinct as an emerging Innovation District, and as such suggest that place quality, diversity of uses and housing options are also key ingredients to a successful innovation district.</p> <p>Council supports night time economy as part of a broader economic strategy to encourage a diverse range of business uses and activities.</p>
<p>26. Facilitate health and education precincts that:</p> <p>a. create the conditions for the continued co-location of health and education facilities, and services to support the precinct and growth of the precincts</p> <p>b. have high levels of accessibility</p> <p>c. attract associated businesses, industries and commercialisation of research</p> <p>d. include housing opportunities for students and workers within 30 minutes of the precinct.</p>	<p>Actions are supported. For Randwick, additional actions are relevant in terms of its role as an emerging innovation precinct, and unique place quality, as reflected in the draft vision prepared by core stakeholders.</p> <p>d. Note access should be within 30 minutes by public or active transport.</p>
27. Deliver and implement a Place Strategy and Infrastructure Plan for the Camperdown-Ultimo health and education precinct.	N/A
28. Deliver and implement a Place Strategy and Infrastructure Plan for the Randwick health and education precinct.	<p>Supported. Work is currently underway on the Collaboration Area in the Randwick Health and Education precinct which will deliver and implement the place strategy and infrastructure plan for the precinct. We note however that there is a role for the GSC to ensure the ongoing work and implementation of the place strategy and infrastructure plan in the future planning of this precinct.</p>
Planning Priority E9 Growing international trade gateways	
<p>29. Manage the interfaces of industrial areas, trade gateways and intermodal facilities by:</p> <p>Land use activities</p> <p>a. providing buffer areas to nearby activities, such as residential uses, that are sensitive to emissions from 24-hour port and freight functions</p> <p>b. protecting industrial lands for port, intermodal and logistics uses from the encroachment of commercial, residential and other non-compatible uses which would adversely affect industry viability to facilitate ongoing operation and long-term growth</p>	<p>Noted. Randwick City's IN1 Light Industrial Area provides a buffer between port land and some of our surrounding residential areas and therefore is important to retain not only for its urban services purposes, but to prevent further negative impacts (noise etc) due to encroachment of Port activities. It is noted however that this light industrial zone is small, and there are large numbers of residences directly adjacent to land under the Ports SEPP.</p> <p>Areas affected by Port related noise are yet to be determined, however regular complainants within the Randwick LGA live within 200-600 metres of the Ports SEPP area, where noise levels have on occasion exceeded the Industrial Night time noise policy. Subsequently, to effectively address this</p>

Theme/Planning Priority/ relevant action	RCC Comment
<p>c. requiring sensitive developments within influence of port and airport operations to implement measures that reduce amenity impacts</p> <p>d. improving communication of current and future noise conditions around Port Botany, airports, surrounding road and rail networks, intermodals and supporting private lands</p> <p>e. improving the capacity of existing stakeholders to implement existing planning noise standards for incoming sensitive developments</p> <p>f. protecting prescribed airspace from inappropriate development, for example, height of building controls that would allow buildings to penetrate prescribed airspace and reducing the capacity of existing airport operations</p> <p>g. identifying and preserving land for future port and airport, intermodal and rail infrastructure</p> <p>h. accommodating advanced manufacturing where appropriate by zoning that reflects emerging development models</p> <p>Transport operations</p> <p>i. providing the required commercial and passenger vehicle, and freight and passenger rail access</p> <p>j. preventing uses that generate additional private vehicle traffic on roads that service Port Botany and Sydney Airport such as large-scale car-based retail and high density residential, to reduce conflicts with large dangerous goods vehicles (for example, Foreshore Road and Denison Street, Banksmeadow).</p>	<p>issue extensive areas of residential acquisition would be required, which is not supported. These established residential areas have existed adjacent to the port area for many years.</p> <p>Without the release of the updated Freights and Port Plan it is difficult to understand the impact of the updated freight projections and Port related strategies may have in relation to these actions.</p> <p>Despite this, we provide the following comments:</p> <p>b) loss of industrial sites: a prime example is BATA site beside Westfield Eastgardens which was recently rezoned from industrial to residential.</p> <p>d) Council has been part of an interagency group to develop a noise strategy for the area surrounding the Port, however due to lack of resources the required noise monitoring required to determine the affected area and develop the subsequent noise strategy has not been achieved</p> <p>e) The affected area needs to be determined through comprehensive noise monitoring before affected areas for sensitive development can be determined.</p> <p>f) Councils already do this, however non leased area of Ports SEPP have no height controls for exempt or complying development.</p> <p>g) Randwick has no vacant industrial land as per table 4</p> <p>h) Limited application to Randwick with only a small area of IN2 light industrial land outside the Ports SEPP area.</p> <p>i) Supported, there is a need for the duplication of rail.</p> <p>j) Supported, however recently approved commercial development on Denison Street (Bunnings) and BATA site on Wentworth avenue have already significantly increased exposure to dangerous Goods route risks.</p>
<p>30. Protect and grow the trade gateways by:</p> <p>Port Botany</p> <p>a. retaining and protecting industrial zoned land in and near Port Botany Precinct</p> <p>b. protecting Port Botany's function as an international gateway for freight and logistics and supporting port-related land uses and infrastructure in the area around the port</p>	<p>In general, the Council supports the policy position on the retention of industrial zoned land within the revised district plan, and in particular to support local urban services and industries. We note however that industrial land around Port Botany is limited and as such any additional use or intensification of Port related use would only further impact on surrounding sensitive land uses i.e residential, particularly in relation to b).</p> <p>We recommend that the GSC take a long term wider strategic view of the</p>

Theme/Planning Priority/ relevant action	RCC Comment
<p>c. supporting the land use needs of freight movement to increase the proportion of container freight transported by rail</p> <p>d. investigating a corridor for an enhanced road link from Port Botany to WestConnex</p> <p>e. investigating duplication of Port Botany freight line</p> <p>f. improving management of land use conflicts</p> <p>g. managing the biosecurity risk for primary industries</p> <p>h. creating safe cycling and walking connections.</p> <p>Sydney Airport</p> <p>i. identifying and protecting strategically important industrial and urban services land in and near Sydney Airport Precinct</p> <p>j. protecting Sydney Airport’s function as an international gateway for passengers and freight, and supporting airport-related land uses and infrastructure in the area around the Airport</p> <p>k. investigating a corridor for an enhanced road link from Sydney Airport to WestConnex</p> <p>l. managing the biosecurity risk for primary industries</p> <p>m. providing safe cycling and walking connections, particularly to Mascot station</p>	<p>role and capacity of Port Botany to manage the bulk of Sydney’s container freight and consider alternative locations for supporting the increase in freight that offer potential for better connections to distribution network in south west and western Sydney.</p> <p>Other key points in relation to Port Botany and the management of land use conflicts in (f) relate to the need for additional onsite truck parking and queuing areas within leased Port areas to prevent trucks from parking and circling within adjacent residential areas. There is a need to expedite the completion of the rail lines duplication.</p> <p>m) suggest to also consider cycle connections between Bayside and Randwick City LGA.</p>
<p>Planning Priority E10 Delivering integrated land use and transport planning and a 30-minute city</p>	
<p>31. Integrate land use and transport plans to deliver the 30-minute city.</p>	<p>Council strongly supports integration of land use and transport planning for the 30 minute city, to access centres by public and active transport within 30 minutes. We suggest the Plan includes of cycling and walking as key components to deliver a 30 minute city in addition to public transport. Currently there are no actions under Priority E10 (or under the Productivity theme) relating to walking and cycling, and this is considered an important omission. The Eastern City District, with its established land use and transport structure, creates good conditions for a 30 minute walking and cycling network to strategic and metropolitan centres, as well as local/neighbourhood centres.</p>
<p>32. Investigate, plan and protect future transport and infrastructure corridors.</p>	<p>Supported. Protection of transport and infrastructure corridors should also include provision for separated cycle paths.</p>
<p>33. Support innovative approaches to the operation of</p>	<p>Supported in principle. This action could also apply to a wide range of trip</p>

Theme/Planning Priority/ relevant action	RCC Comment
business, educational and institutional establishments to improve the performance of the transport network.	generating-land uses. These uses can better manage their impact on the transport network in addition to operational innovations, and we suggest the action could include broader travel demand management measures such as workplace travel planning, parking supply and management, car share/car pool, public transport incentives, etc, and thus also link to this Plan's desired sustainability outcomes
<p>34. Optimise the efficiency and effectiveness of the freight handling and logistics network by:</p> <ul style="list-style-type: none"> a. protecting current and future freight corridors b. balancing the need to minimise negative impacts of freight movements on urban amenity with the need to support efficient freight movements and deliveries c. identifying and protecting key freight routes d. limiting incompatible uses in areas expected to have intense freight activity. 	<ul style="list-style-type: none"> a. Supported. Note that future freight corridors are not yet identified/ confirmed, and Council recommends a broad view on long term trade gateway and freight corridor requirements, including investigating the role and potential of higher capacity container port facilities outside of Greater Sydney (such as Port Kembla). The 40 year vision of the Greater Sydney Region plan and Future Transport Strategy allow this long term perspective. b. It is difficult to achieve balance with the inherently conflicting nature of negative amenity impacts caused by major freight operations in dense urban areas (such as Port Botany). While we support this aim, greater consideration is required about where potential to achieve balance exists, and Council considers there is a stronger role for the freight industry to contribute to this balance than is currently noted in this action. For example, increased use of more efficient, low noise and low emissions vehicles, and improved attention to the regulatory and operating environment (as identified in the Freight and Ports Strategy 2013) should be noted. c. Noted d. In relation to Port Botany, this action cannot be achieved, as the Port is located in a desirable part of Sydney, with established residential areas which are under ongoing development pressure, and it is unrealistic to expect that current incompatible land uses near to the Port will be removed. While Council supports the economic role and contribution of Port Botany in the Randwick LGA, employment self-containment is low, with the large majority of its workers coming from the south and west rather than within Randwick City or eastern suburbs. 87% of these workers drive to Port Botany, adding to the load on the transport network (source: Bureau of Transport Statistics JTW Explorer). It is recommended that the Commission in collaboration with TfNSW takes a long term approach to the role of Port Botany, in order to plan for the growth of container freight in a way that does not add to the existing Port Botany impacts on residents and light industry/urban services land in Randwick

Theme/Planning Priority/ relevant action	RCC Comment
<p>35. Plan for urban development, new centres, better places and employment uses that are integrated with, and optimise opportunities of, the public value and use of Sydney Metro City and South West, CBD and Southeast Light Rail, and Westconnex as well as other city shaping projects.</p>	<p>City.</p> <p>Randwick City’s planning is taking into account the CBD and South East Light Rail through its Kensington to Kingsford Planning Strategy, and the work underway on the Randwick Junction Town Centre. Council notes, however, that the TfNSW business case for light rail was based on existing demand, and did not rely on future development uplift along the corridor. Council does not support the automatic and reactive expectation for increased density with transport investment. Future housing and development is best investigated at the local level, such as through a Local Housing Strategy prepared by councils, which will take into account available and necessary infrastructure as part of a coordinated and comprehensive approach.</p>
<p>36. Investigate and plan for the land use implications of potential long-term transport connections.</p>	<p>As noted above, consideration of future growth and housing capacity (and supporting uses/infrastructure and services) via Local Housing Strategies and town centre studies prepared by councils is supported. Council considers that best practice integrated planning for long term transport connections/corridors and infrastructure should be identified based on thoroughly considered forecast demand, and particularly in relation to major trip generators and employment centres. In contrast, the current practice appears to accept the automatic expectation that transport investment gives a green light to large scale, ad hoc residential densification, resulting in local councils and the state government overloaded with opportunistic planning proposals, and without a comprehensive integrated planning basis. Council does not support this approach, and suggests this action is re-worded to “integrate long-term land use and transport planning in line with future population and employment growth”</p>
<p>Planning Priority E11 Growing investment, business opportunities and jobs in strategic centres</p>	
<p>37. Provide access to jobs, goods and services in centres by:</p> <ul style="list-style-type: none"> a. attracting significant investment and business activity in strategic centres to provide jobs growth b. diversifying the range of activities in all centres c. creating vibrant, safe places and quality public realm d. balancing the efficient movement of people and goods with supporting the liveability of places on the road network e. improving the walkability within and to the centre 	<p>Strongly supported.</p>

Theme/Planning Priority/ relevant action	RCC Comment
<p>f. completing and improving a safe and connected cycling network to and within the centre</p> <p>g. improving public transport services to all strategic centres</p> <p>h. creating the conditions for residential development within strategic centres and within walking distance, but not at the expense of the attraction and growth of jobs, retailing and services; where appropriate, strategic centres should define commercial cores informed by an assessment of their need.</p>	
<p>38. Prioritise public transport investment to deliver the 30-minute city objective for strategic centres along the economic corridor.</p>	<p>Strongly supported.</p>
<p>39. Co-locate health, education, social and community facilities in strategic centres along the economic corridor.</p>	<p>Supported, however we note that location of social and community facilities may be more suitable outside strategic centres, such as in local centres that have a residential rather than an employment catchment, and can better serve the community.</p>
<p>40. Create new centres in accordance with the <i>Principles for Greater Sydney's Centres</i>.</p>	<p>Supported. Suggest Principles should also reference other economic activities in addition to retail uses, as well as the need for integration of social and community activities, especially for new centres to ensure they can create a sustainable foundation for future success. A cross reference to Priority E6/Action 17 relating to the need for centres to be great places would also be relevant here.</p>
<p>41. Engage with the retail sector on its changing planning requirements and update planning controls as required.</p>	<p>Supported. Council has undertaken substantial research on retail trends and needs in relation to planning for the future of the town centres on the CBD to South East Light Rail route.</p>
<p>42. Review the current planning controls and create capacity to achieve the job targets for each of the District's strategic centres.</p>	<p>Supported.</p>
<p>43. Prioritise strategic, land use and infrastructure plans for growing centres, particularly those with capacity for additional retail floor space.</p>	<p>Supported.</p>
<p>44. Encourage opportunities for new smart work hubs.</p>	<p>Supported.</p>
<p>45. Strengthen Bondi Junction through approaches that:</p> <p>a. protect capacity for job targets and a diverse mix of uses to strengthen and reinforce the economic role of the centre</p>	<p>Noted.</p>

Theme/Planning Priority/ relevant action	RCC Comment
<p>b. consider potential options for future public transport connections to the south east of the District to accommodate forecast population and employment growth, and better connect the District</p> <p>c. expand the centre’s function and type of land uses, including attracting A-grade office tenants and knowledge-intensive jobs</p> <p>d. improve access from the centre of Bondi Junction to nearby open space and recreation facilities such as Queens Park, Centennial Park, Moore Park and Bondi Beach</p> <p>e. recognise the centre’s health attributes to support the Randwick health and education precinct and mechanisms for increasing floor space for health uses, including a health focused business incubator</p> <p>f. investigate opportunities to improve and diversify night-time economy offerings</p> <p>g. promote place making initiatives to improve the quality of public spaces.</p>	
<p>46. Strengthen Burwood through approaches that:</p> <p>a. protect capacity for job targets and a diverse mix of uses to strengthen and reinforce the economic role of the centre</p> <p>b. consider development initiatives that encourage the development of large floorplate mixed-use buildings</p> <p>c. improve connections across the centre, including permeability of the rail line</p> <p>d. expand the function and type of land uses in the centre</p> <p>e. investigate opportunities to improve and diversify night-time economy offerings</p> <p>f. promote place making initiatives to improve the quality of public spaces.</p>	Noted.
<p>47. Strengthen Eastgardens-Maroubra Junction through approaches that:</p> <p>a. protect capacity for job targets and a diverse mix of</p>	Strengthening this centre is supported in principle, however we note that the centres of Maroubra Junction and Eastgardens currently operate independently, with contrasting relationships to their surrounds, and

Theme/Planning Priority/ relevant action	RCC Comment
<p>uses to strengthen and reinforce the economic role of the centre</p> <p>b. extend and investigate additional economic activities to connect Eastgardens and Maroubra Junction and complement the existing activities</p> <p>c. leverage future public transport connections in the south east and west of the District</p> <p>d. encourage provision of affordable housing to support the nearby health and education facilities and employment lands</p> <p>e. promote place making initiatives to improve the quality and supply of public spaces, promote walking and cycling connections and integrate with the Green Grid</p> <p>f. improve public transport connections, and walking and cycling between Eastgardens-Maroubra Junction and Randwick.</p>	<p>different roles for their local communities. Maroubra Junction is an existing well-functioning town centre and transport interchange that is integrated into the surrounding community. Council notes and endorses extension of the CBD and South East Light Rail to Maroubra Junction, to support its economic role.</p> <p>In order to develop a cohesive role for this new strategic centre that complements and enhances the existing centres, Council agrees it will be necessary to investigate the current and potential future economic activities, and opportunities to enhance the quality of place and public domain, while recognising that the core economic activities are separated into two nodes.</p> <p>Council requests the Commission facilitate preparation of an economic development strategy in conjunction with councils for the Eastern City District which can provide the economic context and outline the relationships between strategic centres, Collaboration Areas, innovation districts and the visitor economy. This was identified as an action in the draft Central District Plan.</p>
<p>48. Strengthen Green Square-Mascot through approaches that:</p> <p>a. protect capacity for job targets and a diverse mix of uses to strengthen and reinforce the economic role of the centre</p> <p>b. prioritise and protect surrounding employment and urban services lands and their role in supporting the Harbour CBD, trade gateways and other strategic centres</p> <p>c. continue to address road and public transport network congestion and avoid development that generates high road traffic volumes such as large scale retail</p> <p>d. continue reviews to remove barriers to cultural and creative uses</p> <p>e. provide for safe walking and cycling throughout the centre and from Mascot Station to Sydney Airport</p> <p>f. plan for the provision of social infrastructure within Mascot</p> <p>g. Council of the City of Sydney and Bayside Council</p>	<p>Noted. Suggest also to investigate better east – west connectivity.</p>

Theme/Planning Priority/ relevant action	RCC Comment
work together to strengthen and diversify the centre.	
<p>49. Strengthen Rhodes through approaches that:</p> <ul style="list-style-type: none"> a. protect capacity for job targets and a diverse mix of uses to strengthen and reinforce the economic role of the centre b. protect employment generating capacity at Rhodes Business Park c. improve links to the GOP area d. enhance links with the Concord Health Precinct e. promote place making initiatives to improve the quality of public spaces f. develop opportunities to provide sustainable utility infrastructure g. create a connected walking and cycling network within the precinct, to regional links and where possible along river foreshores h. plan for growth that is supported by public transport. 	N/A
Planning Priority E12 Protecting industrial and urban services land	
50. Manage industrial land in the Eastern City District by protecting all industrial zoned land from conversion to residential development, including conversion to mixed use zones.	Supported. A strong policy position on the retention of industrial zoned land is needed within the eastern city district particularly where the pressure to convert to the highest and best use i.e residential is strong.
51. Facilitate the contemporary adaptation of industrial and warehouse buildings through increased floor to ceiling heights.	Supported.
Planning Priority E13 Supporting growth of targeted industry sectors	
52. Consider the barriers to the growth of internationally competitive trade sectors, including engaging with industry and assessing regulatory barriers.	Supported. Suggest that this action be integrated with action 54.
<p>53. When preparing plans for tourism and visitation, consider:</p> <ul style="list-style-type: none"> a. encouraging the development of a range of well-designed and located facilities b. enhancing the amenity, vibrancy and safety of 	Supported. Suggest to also include a review of visitor accommodation needs.

Theme/Planning Priority/ relevant action	RCC Comment
centres, places and precincts c. supporting the development of places for artistic and cultural activities d. improving public facilities and access e. protecting heritage and biodiversity to enhance cultural and eco-tourism f. supporting appropriate growth of the night-time economy g. developing industry skills critical to growing the visitor economy.	
54. Provide a regulatory environment which enables economic opportunities created by changing technologies.	Supported.
55. Consider opportunities to implement place-based initiatives to attract more visitors, improve visitor experiences and ensure connections to transport at key tourist attractions.	Supported. Council notes the importance of the La Perouse as a location of continuous indigenous habitation, and also layered with French history, and well -preserved World War Two fortifications at Bare Island. The Council recently took over the head lease of the La Perouse Museum from National Parks and Wildlife Services and is working with key stakeholders in developing a business plan for the museum to further interpret and promote the area's significance. A feasibility study has also been undertaken on a ferry service from Kurnell to La Perouse which will improve accessibility to this important site. Funding is critical to implementing place-based initiatives.
56. Consider opportunities to enhance the tourist and visitor economy in the District, including a coordinated approach to tourism activities, events and accommodation.	Supported. Suggest that Destination NSW be the lead agency responsible to develop a tourism and visitor strategy (in conjunction with local councils) for the eastern city district.

Theme/Planning Priority/ relevant action	RCC Comment
Liveability	
Planning Priority E3 Providing services and social infrastructure to meet people's changing needs	
Actions	
8. Deliver social infrastructure to reflect the needs of the community now and in the future	Supported. However, funding of social infrastructure items is limited. The Council calls on the DPE to review the local infrastructure

Theme/Planning Priority/ relevant action	RCC Comment
	contributions framework (i.e value capture, s94A) to enable local councils to collect contributions in line with growth and include a broader range of social infrastructure items which the council could levy for.
9. Optimise the use of available public land for social infrastructure.	Supported. However, Council seeks further information as to how this would be implemented.
Planning Priority E4 Fostering healthy, creative, culturally rich and socially connected communities	
10. Deliver inclusive places for people of all ages and abilities that support healthy, resilient and socially connected communities by: a. providing walkable places with active street life and a human scale b. co-locating schools, social, health, sporting, cultural and shared facilities.	Supported. The Council is committed to the planning, development and management of services for older people, families, the children and the youth and people with a disability. The Council has adopted a social inclusion plan ' <i>Inclusive Randwick City Plan</i> ' to encourage a more inclusive and cohesive community; and a Disability Inclusion Action Plan which aims to remove barriers and enable people with disability to participate equally in the community. In addition, the Council hosts an access advisory committee, a youth advisory committee and an older person's advisory committee; and all Council's centres including leisure centres are now accessible.
11. Consider cultural diversity in strategic planning and engagement	Supported. The council is committed to understanding and serving the community's cultural needs and has adopted a social inclusion plan (as mentioned above). The Council notes that the revised district plan makes reference to a cultural infrastructure strategy (on pg.31) which is yet to be developed by the Cultural Infrastructure Program Management Office and Infrastructure NSW; and as such we request further detail as to how this strategy will be implemented, once finalised.
12. Strengthen the economic self-determination of Aboriginal communities by engagement and consultation with Local Aboriginal Land Councils to better understand and support their economic aspirations as they relate to land use planning.	The Council welcomes and supports an action 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

Theme/Planning Priority/ relevant action	RCC Comment
	<p>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.</p> <p>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.</p>
<p>13. Facilitate opportunities for creative and artistic expression and participation, wherever feasible with a minimum regulatory burden, including:</p> <ul style="list-style-type: none"> a. creative arts and cultural enterprises and facilities b. creative interim and temporary uses c. appropriate development of the night-time economy. 	<p>Supported. Council supports and values the contribution that the creative arts has within the local community and urban context and identifies NIDA as a leading dramatic arts institution in the local area. However, while NIDA was built and fully funded by UNSW, other local arts enterprises and facilities are limited due to limited funding and land availability. The Council notes that funding to leverage arts and cultural facilities including fit out through the local development contributions framework is limited. As such it is not only the regulatory environment which needs to be reviewed but also the funding environment.</p>
<p>14. Strengthen social connections within and between communities through better understanding of the nature of social networks and supporting infrastructure in local places</p>	<p>Randwick City is a significant contributor of regional open space and sporting fields within the Eastern District which serves a wide population (outside of the LGA). The Council is keen to help inform and contribute towards a Sport and Recreation participation strategy and a sport and recreation facility plan for the district but suggests that this also needs to consider and involve Crown Lands to assist in identifying future areas of public recreation and facilities.</p>
<p>Planning Priority E5 Providing housing supply, choice and affordability, with access to jobs and services</p>	
<p>15. Prepare local or district housing strategies that address the following:</p> <ul style="list-style-type: none"> a. the delivery of five-year housing supply targets for each local government area b. the delivery of 6–10 year (when agreed) housing supply targets for each local government area c. capacity to contribute to the longer term 20-year strategic housing target for the District d. housing strategy requirements outlined in Objective 10 of the draft Greater Sydney Region Plan that include: <ul style="list-style-type: none"> i). creating capacity for more housing in the right locations ii). supporting planning and delivery of priority growth areas and precincts as relevant to each local government area 	<p>Supported.</p> <ul style="list-style-type: none"> a) The Council notes that there is no change to the five year housing target. However, reiterates that as part of any housing supply target that this also include a component for affordable rental housing for the very low, low and moderate income households d) The requirements outlined in (d) are supported however the Council seeks further information as to how the commission identified the priority precinct for south Kingsford/Maroubra and requests that the GSC review the need for a priority precinct in Randwick City, and instead retain the Anzac Parade corridor as a potential future urban renewal investigation area, as previously identified in the Plan for Growing Sydney, with Council as the lead agency.

Theme/Planning Priority/ relevant action	RCC Comment
iii). supporting investigation of opportunities for alignment with investment in regional and district infrastructure iv). supporting the role of centres	A local housing strategy prepared by Council is best placed to identify future housing locations and capacity. This approach also better aligns with the 10-20 year timeframe to investigate additional transport infrastructure to the south of the LGA.
16. Prepare Affordable Rental Housing Target schemes.	The Council supports an affordable rental housing target scheme however raises several concerns and points for consideration which is discussed in the main body of the submission.
Planning Priority E6 Creating and renewing great places and local centres, and respecting the District's heritage	
17. Deliver great places by: a). prioritising a people-friendly public realm and open spaces as a central organising design principle b). recognising and balancing the dual function of streets as places for people and movement c). providing fine-grain urban form, high amenity and walkability d). integrating social infrastructure to support social connections and provide a community hub e). encouraging contemporary interpretation of heritage where possible f). using a place-based and collaborative approach throughout planning, design, development and management.	<p>Supported. The Council supports delivering great places, and recognises that great places come in all shapes and sizes. Much of the detail in this action seems mostly appropriate to local and neighbourhood centres, and public open spaces. We suggest this is clarified.</p> <p>c) Council suggests that a fine grain urban form is not applicable in all situations, and that perhaps the intention of this subsection could be better reflected by referring to the need to respond to human scale.</p> <p>d) Council considers it is important to locate community hubs in appropriate places (eg: local/neighbourhood centres, and community open spaces), and suggests this action is clarified to not refer to all places.</p> <p>In addition, it is unclear how this policy guideline would be implemented and/or considered in the strategic planning of an area. Instead it is suggested that it be listed in the minister's s117 directions. See also discussion on heritage within the main body of the submission.</p>
18. Conserve and enhance environmental heritage by: a). engaging with the community early in the planning process to understand Aboriginal, European and natural heritage values b). conserving and interpreting Aboriginal, European and natural heritage to foster distinctive local places.	<p>Supported. Council supports the recognition of the importance of respect for heritage and commends the inclusion of this Planning Priority. However, the Council suggests that in the heritage section of the draft plan (pg.48) that in addition to the term "heritage streetscapes", the term "heritage conservation area", which is a term recognised in NSW planning legislation, should also be included. The recognition of these existing heritage places in the District Plan is commended.</p> <p>The Council also notes that the Office of Environment and Heritage is in the process of drafting an Aboriginal Cultural Heritage Bill that will aim to deliver: greater recognition of Aboriginal cultural heritage; decision</p>

Theme/Planning Priority/ relevant action	RCC Comment
	making by Aboriginal people; better information gathering and management; improve protection and conservation; and give greater confidence in the regulatory system.
19. Use place-based planning to support the role of centres as a focus for connected neighbourhoods.	Supported.
20. In Collaboration Areas, Priority Precincts and planning for centres: a). investigate opportunities for precinct-based provision of adaptable car parking and infrastructure in lieu of private provision of car parking b). ensure parking availability takes into account the level of access by public transport c). consider the capacity for places to change and evolve, and accommodate diverse activities over time.	Supported. Policy guidance by the DPE and/or Commission on future parking provision particularly in urban renewal areas, is greatly needed. This would also need to take into account evolving new technologies (i.e driverless cars) and demonstrate best practice.
21. Use flexible and innovative approaches to revitalise high streets in decline	Supported. However, there needs to be support and/or guidance by DPE for Councils wishing to implement funding frameworks to support urban renewal initiatives and approaches. This would include a review of the local development contributions framework including value capture and s94A. Funding is an essential component towards revitalising high streets in decline and the current funding frameworks are limited and/or have not kept up with need.

Theme/Planning Priority/ relevant action	RCC Comment
Sustainability	
Planning Priority E14 Protecting and improving the health and enjoyment of Sydney Harbour and the District's waterways	
Actions	
57. Protect environmentally sensitive coastal areas and waterways.	Supported. A policy position on the protection of environmentally sensitive coastal areas and waterways is needed. The Council has identified and mapped these areas within its local planning framework.
58. Enhance sustainability and liveability by improving and managing access to waterways, foreshores and the coast for recreation, tourism, cultural events and water-based transport.	Supported. However, Council notes that increased population results in increased use and demand for access to coastal areas for recreation; and in turn the need for resources to upgrade existing recreational facilities to meet current and future demand. Any upgrade need to

Theme/Planning Priority/ relevant action	RCC Comment
	consider ways to reduce conflict between different user groups at popular locations while being sensitive to the fragile marine environment in which they are located.
59. Improve the health of catchments and waterways through a risk-based approach to managing the cumulative impact of development including coordinated monitoring of outcomes.	Supported. The Council supports this action and recommends that regional/precinct scale stormwater harvesting and reuse systems be encouraged to assist in addressing flooding and beach water quality issue.
60. Reinstate more natural conditions in highly modified urban waterways.	Council suggests that this action needs to be considered as part of any future precinct redevelopment.
Planning Priority E15 Protecting and enhancing bushland and biodiversity	
61. Protect and enhance biodiversity by: a. supporting landscape-scale biodiversity conservation and the restoration of bushland corridors b. managing urban bushland and remnant vegetation as green infrastructure	Supported. Suggest to also include 'Mitigating climate change impacts on biodiversity' i.e. habitat corridors to increase connectivity and resilience. The Southern Sydney Region Of Councils and Sydney Coastal Councils Group have mapped habitat corridors for the joint Council regions which covers all of the Council's within Eastern City District Area; and this body of work should be recognised in the district plan. Greater Sydney Local Land services are hosting GIS mapping layer on the habitat corridors for the next four years.
Planning Priority E16 Protecting and enhancing scenic and cultural landscapes	
62. Identify and protect scenic and cultural landscapes.	Supported. The Council has identified and mapped important scenic and cultural landscapes within its local planning framework.
63. Enhance and protect views of scenic and cultural landscapes from the public realm.	Supported. As per Action 62 above.
Planning Priority E17 Increasing urban tree canopy cover and delivering Green Grid connections	
64. Expand urban tree canopy in the public realm.	Supported. However, the Council suggests that vegetation other than trees needs to be acknowledged for their potential in contributing to a reduction to the urban heat island effect, climate change impacts and contributions to biodiversity and wellbeing.
65. Progressively refine the detailed design and delivery of: a. Greater Sydney Green Grid priority opportunities b. connections that form the long-term vision of the network.	Supported. However, the benefits of concentrating efforts to improve the open space connections based on the Green Grid network seems to be unclear. Ensuring existing open space has appropriate level of tree cover and is of high quality would seem to be a more achievable and obvious improvement towards delivering a Green Grid network. In addition, it is noted that there are limited priority projects within Randwick City (part of the Botany wetlands to Centennial Park link) and the draft plan notes that the Metropolitan Greenspace funding 17/18 will

Theme/Planning Priority/ relevant action	RCC Comment
	only fund priority projects. Based on this, the Council suggests to bring forward the Coastal Walk and/or the Eastern Beaches Walk (linking east to west) as additional priority projects for the eastern district.
Planning Priority E18 Delivering high quality open space	
<p>66. Maximise the use of existing open space and protect, enhance and expand public open space by:</p> <ul style="list-style-type: none"> a. investigating opportunities to expand a network of diverse, accessible, high quality open space that responds to the needs and values of communities as populations grow b. investigating opportunities to provide new open space so that all residential areas are within 400 metres of open space and all high density residential areas are within 200 metres of open space c. requiring large urban renewal initiatives to demonstrate how access to high quality and diverse local open space is maintained or improved d. planning new neighbourhoods with a sufficient quantity of new open space e. delivering shared and co-located sports and recreational facilities, including shared school grounds and repurposed golf courses f. delivering on, or complementing, the Greater Sydney Green Grid. 	<p>Supported.</p> <p>Suggest that: a/b) Crown land divestment to local Councils should be prioritised around areas that currently are deficient in open space areas i.e. that are not within the 200m/400m guidelines.</p> <p>e) Council supports the shared use and public access to golf courses and encourages involvement and discussion with Crown land to ensure and maintain public access to golf courses, especially in popular coastal areas. However, it is noted that the draft Crown Land Management Act proposes to enable leaseholders to restrict public access to sites via erection of a sign. The GSC will need to consider the implications of this draft Act to achieving this action.</p> <p>f) The council requests further information on the Green Grid (and its physical representation) and how it will be implemented to know whether it will result in real connections that have meaning in improving and connecting open space.</p>
Planning Priority E19 Reducing carbon emissions and managing energy, water and waste efficiently	
67. Support initiatives that contribute to the aspirational objective of achieving net-zero emissions by 2050, especially through the establishment of low-carbon precincts in Priority Growth Areas, Priority Precincts, Collaboration Areas, State Significant Precincts and Urban Transformation projects.	Strongly supported. See discussion in the submission on 'low carbon precincts' for additional suggestions on this action.
68. Support precinct-based initiatives to increase renewable energy, and energy and water efficiency, especially in Priority Growth Areas, Priority Precincts, Collaboration Areas, State Significant Precincts and Urban Transformation projects.	Strongly supported. See discussion in the submission on 'low carbon precincts' for additional suggestions on this action.
69. Protect existing and identify new locations for waste recycling and management.	The Council recommends that appropriate buffers between these facilities and adjacent residential areas should be required to minimise

Theme/Planning Priority/ relevant action	RCC Comment
70. Support innovative solutions to reduce the volume of waste and reduce waste transport requirements.	traffic, noise and odour impacts and adjacent sensitive areas. Supported. Suggest that innovative waste solutions such as Centralised waste facilities and services be considered in the future planning of priority growth areas, priority precincts, collaboration areas and urban renewal precincts; and that the Commission investigate ways to reduce barriers to establishment of local small scale waste processing facilities like energy-from-waste and organic waste facilities.
71. Encourage the preparation of low-carbon, high efficiency strategies to reduce emissions, optimise the use of water, reduce waste and optimise car parking provision where an increase in total floor area greater than 100,000 square metres is proposed in any contiguous area of 10 or more hectares.	Strongly supported. However, Council requests clarification as to how this action will be implemented and suggest that this be a requirement in the planning of priority growth areas, priority precincts, collaboration areas and urban renewal precincts.
72. Investigate potential regulatory mechanisms such as a Protection of the Environment Policy (PEP) that sets low-carbon, high-efficiency targets to be met through increased energy efficiency, water recycling and waste avoidance, reduction or reuse. This could include a framework for the monitoring and verification of performance for Priority Growth Areas, Priority Precincts, Collaboration Areas, urban renewal precincts and housing growth areas that are planned to have an increase in total floor area greater than 100,000 square metres.	Supported. However, the Council suggests that 'Opt in higher BASIX targets' (as indicated in the draft Climate Change Policy) should be included in the district plan, especially for priority precincts and urban renewal areas. See further discussion in the main body of this submission.
Planning Priority E20 Adapting to the impacts of urban and natural hazards and climate change	
73. Support initiatives that respond to the impacts of climate change.	Supported. However, the Council calls on the mitigation actions need to be co-ordinated and consistent across the district.
74. Mitigate the urban heat island effect and reduce vulnerability to extreme heat.	Supported. Work undertaken by RMIT University Melbourne has analysed The Urban heat island mapping for all Sydney, <i>Where Should All The Trees Go?</i> . This work should be used to prioritise areas for heat mitigation works.