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RANDWICK NSW 2031

## Letter of Support: Randwick City Council draft Local Strategic Planning Statement

Thank you for submitting Randwick City Council's draft Local Strategic Planning Statement (LSPS) seeking the support of the Greater Sydney Commission (the Commission) for consistency with the Greater Sydney Region Plan – *A Metropolis of Three Cities* (GSRP) and Eastern City District Plan. The making of LSPSs by councils in Greater Sydney marks a milestone in the delivery of planning reforms that place greater emphasis on strategic planning.

In our role as the Commission's Assurance Panel, we appreciate that these first LSPSs across Greater Sydney are foundational in strengthening how growth and change will be managed into the future. We note your draft LSPS has been prepared in response to the provisions of Section 3.9 of the *Environmental Planning & Assessment Act 1979* (EP&A Act).

**We confirm that the Commission supports Randwick City Council's draft Local Strategic Planning Statement (March 2020) as being consistent with the Greater Sydney Region Plan and Eastern City District Plan under Section 3.9(3A) of the EP&A Act.**

Our decision on consistency reflects the work already undertaken informing your first LSPS. The Commission understands that work is still in progress (including the Affordable Housing Strategy update, Economic Development Strategy and Local Centres Study) which will further support the LSPS and inform future updates.

**The Commission's support is based, in part, on Council's intent to deliver the Eastern City District Plan as set out in the Local Strategic Planning Statement.**

In this context, the Commission's expectation is that Council will undertake a program of work to implement the LSPS and has, at **Attachment A**, included Advisory Notes to assist Council. These Advisory Notes have regard to:

- the interrelationship of the LSPS, housing targets and the Local Housing Strategy for Randwick City Council;
- updates to population projections during the preparation of the LSPS;
- Future Transport 2056's city-shaping and city-serving transport infrastructure;
- interdependencies with State agency programs and policies;
- key initiatives that relate to resilience planning; and
- Council-led initiatives identified for further investigation.



It is further noted that Council may need to update the LSPS as key supporting studies including the Local Housing Strategy, are finalised.

In conclusion, we acknowledge the significant amount of work that Council has undertaken to develop the LSPS, and the spirit of collaboration that Council has shown throughout this process. Please pass on our thanks to all the members of your team who have assisted in achieving this significant milestone for the Randwick City Council. We look forward to continuing our work together creating a more liveable, productive and sustainable Greater Sydney.

With the benefit of this Letter of Support, it is now up to Council to determine whether it will make the draft LSPS (March 2020). Please note that no further amendments may be made to the LSPS prior to it being made (unless a further Letter of Support is obtained from the Commission).

Please be advised that once the LSPS is published on the NSW ePlanning Portal, the LSPS Tracker on the Commission's website will be updated to include this Letter of Support. Should you have any questions on making your LSPS, please contact Amanda Harvey, A/Executive Director, Eastern Harbour City, Department of Planning, Industry and Environment, on (02) 8275 1120 or [Amanda.Harvey@planning.nsw.gov.au](mailto:Amanda.Harvey@planning.nsw.gov.au).

Yours sincerely,

**Lucy Turnbull AO**  
**Chief Commissioner**  
**Chair of Assurance Panel**  
**Commission Delegate**

**Dr Deborah Dearing**  
**Eastern City District Commissioner**  
**Assurance Panel Member**

**25 March 2020**

cc. Jim Betts, Secretary, Department of Planning, Industry and Environment  
Elizabeth Mildwater, Deputy Secretary, Transport for NSW  
Anthony Manning, Chief Executive, School Infrastructure NSW  
Nigel Lyons, Deputy Secretary, NSW Ministry of Health



## Attachment A

### Advisory Notes on implementation of the Randwick City Council's draft Local Strategic Planning Statement:

*These Advisory Notes highlight key considerations to support Council in the implementation of the first LSPS.*

Eastern City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
<p><b>Infrastructure and Collaboration</b></p>	
<p><b>1. State-led transport investigations and projects</b></p> <p><i>Planning Priority E1, Action 3 seeks to align forecast growth with infrastructure.</i></p>	<ul style="list-style-type: none"> <li>• Continue to consult with Transport for NSW (TfNSW) on planning for city-shaping and city serving transport initiatives in Future Transport 2056<sup>1</sup> including:               <ul style="list-style-type: none"> <li>○ 0-10 years committed initiative in progress<sup>2</sup>: CBD and South East Light Rail.</li> </ul> </li> </ul>
<p><b>2. Council-led transport initiatives</b></p> <p><i>Planning Priority E1 seeks to plan for a city supported with infrastructure.</i></p>	<ul style="list-style-type: none"> <li>• Note: The draft LSPS includes Council-led transport infrastructure initiatives that will require ongoing consultation and collaboration with State agencies. These include:               <ul style="list-style-type: none"> <li>○ east-west public transport networks;</li> <li>○ improved public and active transport access and connections to Randwick's strategic centres, including more frequent night-time transport options;</li> <li>○ improved bus services to integrate with Light Rail services; and</li> <li>○ improved transport access and connections to Randwick's strategic centres.</li> </ul> </li> <li>• Work with TfNSW to integrate the proposed Local Transport Strategy with the South East Sydney Transport Study and the Randwick Collaboration Area.</li> </ul>
<p><b>3. Shared use agreements</b></p> <p><i>Planning Priority E3, Action 9 seeks to optimise the use of available public land for social infrastructure.</i></p>	<ul style="list-style-type: none"> <li>• Work with Department of Education on potential shared use arrangements for school grounds and facilities to provide additional open space and community spaces.</li> </ul>
<p><b>Liveability</b></p>	

<sup>1</sup> Source: <https://future.transport.nsw.gov.au/plans/greater-sydney-services-and-infrastructure-plan/service-and-infrastructure-initiatives>

<sup>2</sup> Source: <https://future.transport.nsw.gov.au/delivering-future-transport-2056>



Eastern City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
<p><b>4. Local contributions</b></p> <p><i>Planning Priority E3, Action 8 requires councils to deliver social infrastructure that reflects the needs of the community now and in the future.</i></p>	<ul style="list-style-type: none"> <li>Consult with DPIE regarding local contribution rates and the essential works list.</li> </ul>
<p><b>5. Local Housing Strategy - Housing analysis</b></p> <p><i>Planning Priority E5, Action 16 requires councils to prepare Local Housing Strategies.</i></p> <p><i>Planning Priority E5, Action 17 requires councils to prepare Affordable Rental Housing Target Schemes following the development of implementation arrangements.</i></p>	<ul style="list-style-type: none"> <li>Note: the NSW Government's Local Housing Strategy Guidelines require Council's Local Housing Strategy to be approved by the Department of Planning, Industry and Environment (DPIE).</li> <li>As set out in the Local Housing Strategy Guideline<sup>3</sup>, the strategy is to include an analysis of changing demographics, housing density and housing market demand to confirm take-up rates and proposed staged approach.</li> <li>Note: The Local Housing Strategy should be informed by the NSW Government's Guideline for Developing an Affordable Housing Contribution Scheme<sup>4</sup>.</li> </ul>
<p><b>6. Local Housing Strategy – 6-10 Year housing target</b></p> <p><i>Planning Priority E5, Action 16(b) of the Eastern City District Plan requires Local Housing Strategies to address the delivery of 6-10 year (when agreed) housing supply targets for each local government area.</i></p>	<ul style="list-style-type: none"> <li>As set out in Action 4 of the Greater Sydney Region Plan, Council's 6-10 year housing target is to inform the development of updated local environmental plans (LEPs) and housing strategies.</li> <li>The Commission notes: <ul style="list-style-type: none"> <li>Council's housing analysis<sup>5</sup> indicates a 6-10 year target for the period 2021 to 2026 of 4,300 dwellings.</li> <li>DPIE monitoring<sup>6</sup> shows the current housing supply forecast for the period 2019/20 to 2020/24 of 2,100 dwellings.</li> </ul> </li> <li>In this context, Council is to show how it can meet an indicative draft range for 6-10 year housing target for the period 2021/22 to 2025/26 of 4,000 to 4,300 dwellings as part of finalising the Local Housing Strategy and relevant LEP updates.</li> </ul>

<sup>3</sup> Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/Local-Housing-Strategy-Guideline-and-Template.pdf>

<sup>4</sup> Source: <https://www.planning.nsw.gov.au/Policy-and-Legislation/Housing/Diverse-and-affordable-housing/-/media/C6F1D0F0359C4AB7A28C90BE7DEEE636.ashx>

<sup>5</sup> Source: Local Strategic Planning Statement (Randwick City Council Vision 2040) March 2020, p27

<sup>6</sup> Source: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Forecast-data>



Eastern City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
	<ul style="list-style-type: none"> <li>• Testing this indicative range is to include a preliminary assessment of any relevant NSW Government investment decisions in consultation with State agencies.</li> <li>• Where relevant data is available, councils are to identify the contribution of non-standard dwellings<sup>7</sup> (seniors housing, boarding houses and secondary dwellings) in relation to this indicative range.</li> <li>• Note: The NSW Government’s strategic documents outline the direction for planning land use, service and infrastructure delivery across NSW. Population projections<sup>8</sup> are subject to review over time and will be managed through updates to the Region and district plans.</li> </ul>
<p><b>7. Local character</b></p> <p><i>Planning Priority E6, Action 18 requires recognising and celebrating the character of a place and its people throughout planning, design, development and management to deliver great places.</i></p>	<ul style="list-style-type: none"> <li>• Note: In identifying local character and/or desired future character, Council should have reference to the NSW Government’s Local Character and Place Guideline (2019) and Government Architect NSW’s Better Placed: An integrated design policy for the built environment of New South Wales (2017).</li> <li>• Consult with DPIE on the approach to implementing local character.</li> </ul>
<p><b>8. Place based planning for local centres</b></p> <p><i>Planning Priority E6, Action 21 requires councils to use a place-based and collaborative approach to deliver great places.</i></p>	<ul style="list-style-type: none"> <li>• Consult with DPIE on place-based planning for local centres, including: <ul style="list-style-type: none"> <li>○ Place-based initiatives identified within the Tourism and Visitor Management Study; and</li> <li>○ Randwick Junction Town Centre Strategy.</li> </ul> </li> <li>• Place-based planning should have regard to the findings of the Local Housing Strategy and the Economic Development Strategy.</li> </ul>
<p><b>9. Heritage</b></p> <p><i>Planning Priority E6, Action 20 requires Councils to identify, conserve and enhance environmental heritage.</i></p>	<ul style="list-style-type: none"> <li>• Continue to work with DPIE and Heritage NSW to ensure a strategic approach is taken to environmental heritage including Aboriginal cultural heritage in implementing the LSPS and developing LSPS updates.</li> </ul>

<sup>7</sup> Standard dwellings relate to those monitored via DPIE’s housing monitor (ie. Sydney Water connections) and Non-standard dwellings are those delivered under housing related SEPPs such as seniors, boarding houses and affordable rental housing (secondary dwellings). For more information refer to: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Other-forms-of-housing>

<sup>8</sup> Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Randwick.pdf>



Eastern City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
<b>Productivity</b>	
<p><b>10. Industrial and employment lands strategy</b></p> <p><i>Planning Priority E12, Action 51 requires Randwick Council to retain and manage industrial and urban service land in line with the Principles for managing industrial land in the Eastern City District Plan.</i></p>	<ul style="list-style-type: none"> <li>Note: The Eastern City District Plan identifies industrial and urban services land in Randwick as <i>Retain and Manage</i>.</li> <li>Confirm with DPIE if Council's Economic Development Strategy (including an industrial land review) will require approval to inform LEP updates.</li> </ul>
<p><b>11. Strategic centres</b></p> <p><i>Planning Priority E11, Action 48 requires DPIE and Councils to strengthen Eastgardens-Maroubra Junction.</i></p> <p><i>Planning Priority E8, Action 29 requires the delivery of a Place Strategy for the Randwick health and education precinct.</i></p>	<ul style="list-style-type: none"> <li>Consult with DPIE on place-based planning for Eastgardens-Maroubra Junction Strategic Centre.</li> <li>Consider the Randwick Place Strategy when undertaking Randwick Junction Town Centre review, along with opportunities to support the Eastern District Plan high jobs target for Randwick.</li> </ul>
<b>Sustainability</b>	
<p><b>12. Open space strategy</b></p> <p><i>Planning Priority E18, Action 67 requires councils to maximise the use of existing open space and protect, enhance and expand open space.</i></p>	<ul style="list-style-type: none"> <li>Consider Council's contribution to the Premier's Priority to 'Increase the proportion of homes in urban areas within 10 minutes' walk of quality green, open and public space by 10 per cent by 2023'.</li> <li>Confirm with DPIE if Council's Open Space and Recreation Needs Strategy requires approval to inform LEP updates.</li> </ul>
<p><b>13. BASIX</b></p> <p><i>Planning Priority E19 requires councils to reduce carbon emissions and manage energy, water and waste efficiently.</i></p>	<ul style="list-style-type: none"> <li>Consult with DPIE regarding changes sought to BASIX standards.</li> </ul>



<b>Sustainability</b>	
<p><b>14. Resilience to natural and urban hazards</b></p> <p><i>Planning Priority E20 requires councils to respond to the impacts of climate change (Action 74) and limit the intensification of development in existing urban areas most exposed to hazards (Action 75).</i></p> <p><i>Action 76 requires councils to mitigate the urban heat island effect and reduce vulnerability to extreme heat.</i></p>	<ul style="list-style-type: none"> <li>• Collaborate with the Greater Sydney Commission, other relevant State agencies and neighbouring councils to strengthen approaches to resilience in Council's strategies plans and programs particularly the:               <ul style="list-style-type: none"> <li>○ Integrated Transport Strategy;</li> <li>○ Community Facilities Study;</li> <li>○ Open Space/Recreation Strategy;</li> <li>○ Environmental Strategy; and</li> <li>○ Green Infrastructure Plan.</li> </ul> </li> <li>• Continue to work with State agencies to manage flood, coastal erosion and the urban heat island effect, and continue to address these through Council's program of local strategic and place-based planning.</li> </ul>
<b>Implementation</b>	
<p><b>15. Planning framework</b></p> <p><i>Section 6 Implementation, Figure 26.</i></p>	<ul style="list-style-type: none"> <li>• Note: Notwithstanding the content of the LSPS, Ministerial Directions under Section 9.1 of the EP&amp;A Act and State Environmental Planning Policies continue to apply to the LGA.</li> </ul>
<p><b>16. Updates to LSPS</b></p> <p><i>Planning Priority E21 requires councils to prepare local strategic planning statements informed by local strategic planning.</i></p>	<ul style="list-style-type: none"> <li>• As set out in the LSPS Guidelines, revisions to the LSPS may be required in response to significant changes in the LGA such as announcements on centres revitalisation, new infrastructure investment and employment opportunities, significant changes in projected population growth or changes to the relevant higher order strategic plan.</li> </ul>
<p><b>17. Monitoring and review</b></p> <p><i>Planning Priority E21, Action 77 LEP Review and Section 3.8 (4a) EP&amp;A Act LEP Updates.</i></p>	<ul style="list-style-type: none"> <li>• Progress on the implementation of the District Plan will be reviewed and monitored with a focus on actions that support LEP Updates.</li> </ul>
<p><b>18. Monitoring and review</b></p> <p><i>Planning Priority E22, Action 78 requires the development of performance indicators in consultation with state agencies and councils that measure the 10 Directions to inform inter-agency, State and local government decision-making.</i></p>	<ul style="list-style-type: none"> <li>• Council is encouraged to apply the performance indicators in <i>The Pulse of Greater Sydney</i>, which are available at the LGA level<sup>9</sup>.</li> </ul>

<sup>9</sup> Source: <https://www.greater.sydney/pulse-of-greater-sydney>