

Attachment A

**Summary of submissions and City's
response**

Introduction

This submissions table provides a summary of the 91 submissions received during the public exhibition period of *City Plan 2036: Draft City of Sydney Local Strategic Planning Statement* (draft planning statement), *Housing for All: Draft City of Sydney Housing Strategy* (draft housing strategy) and *Housing for All: Draft City of Sydney Housing Strategy – Technical Paper* (technical paper).

Submissions came from a range of stakeholders including residents, community groups, industry peak bodies, planning consultants representing developers or large land owners and state agencies. Over 85 per cent of submissions stated overall support for the draft planning statement and draft housing strategy. The community groups, industry, peak bodies and state agencies who made submissions are listed below.

Community groups	
Australian Slacklining Association	Chippendale Residents Interest Group
The Glebe Society	Sturt Street Residents Association
The Paddington Society	Older Women's Network
Sydney Co-Housing	
Industry	
Harvey Norman (with Knight Frank Town Planning)	Defence Housing (with Mecone)
Macken Strategic Planning Solutions	AMP Capital
Altis Property Partners (with Ethos Urban)	Sicard Pty Ltd (with Ethos Urban)
Bridge Housing	Barana Group (with Ethos Urban)
Mirvac Group (with Ethos Urban)	Markham Real Estate Partners (With Mecone)
The Salvation Army (with Ethos Urban)	Belvoir
City West Housing	Dexus
Centennial Property Group (with SJB)	Pyrmont Bridge Pty Ltd (with Macroplan)
Unions NSW (with SJB)	SHMH Group Australia (with Mecone)
Stockland	Aliro (with Urbis)
National Arts School (with Ethos Urban)	Addenbrooke Pty Ltd (with Ethos Urban)
LaSalle Investment Management (with Mecone)	Aplus Design Group
Toga Group (with Ethos Urban)	Milligan Group
Margie Pty Ltd (with Candalepas Associates)	Goodman
Huaju Investments Pty Ltd (with Candalepas Associates)	Opera Australia
Walker Corporation	Landcom
Nechi Holdings Pty Ltd	Centuria (with Ethos Urban)
Stasia (with Ethos Urban)	Salter Brothers (with Ethos Urban)
Arkadia Property Services (with Mecone)	Anglicare (with DFP Planning)
Woolworths (with Ethos Urban)	Far East Organisation
Han's Group (with Ethos Urban)	Emag Apartments Pty Ltd (with Urbis)
Notre Dame University (with Urbis)	Investa (with Ethos Urban)
Catholic Healthcare Ltd (with Ethos Urban)	Charter Hall (with Ethos Urban)
UTS (with Ethos Urban)	Uniting (with Ethos Urban)
Pemika Pty Ltd and Rex Holdings (with Knight Frank)	Kennards and Keneco Property (with KDC)
Rosebery Child Care Centre	
Peak Bodies	
Cancer Council of Australia	Cancer Institute NSW

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Urban Development Institute of Australia	Shelter NSW
Property Council of Australia	Large Format Retail Association (with Ethos Urban)
Urban Taskforce	Community Housing Industry Association
State Agencies	
Sydney Local Health District	Environmental Protection Authority
Transport for NSW	Sydney Water
Heritage NSW	

Submissions have been categorised into different themes to help streamline matters raised and the City's response.

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Matter raised	Response
Capacity and targets	
<p><i>Submissions from industry and peak bodies</i></p> <ul style="list-style-type: none"> i. Housing forecasts in the draft planning statement and the draft local housing strategy rely too heavily on historically high completion rates and the recent history of a historically strong residential market in metropolitan Sydney meaning that in all likelihood greater emphasis and focus will be required to support housing supply to meet future growth. ii. Not all land will be built to its theoretical maximum under the current controls, due to various constraints. It is therefore recommended that the draft planning statement plan not rely on the capacity study to deliver the 56,000 dwellings identified in the targets. The City should amending its local environmental plan and upzone land to provide more capacity than what is currently available under existing planning controls across the City. iii. The draft planning statement should recognise that land excluded from the Development Capacity Study 2019 (by reason of triggering certain exclusion criteria) nevertheless may have potential for significant urban renewal that can contribute to additional residential and non-residential floor space. iv. Approximately 13% of the sites under consideration have an extra capacity of less than 500 square metres, we are concerned that this capacity may not be realised. v. The City, in collaboration with DPIE, should reintroduce the Urban Development Program to deliver and monitor growth, with clear accountabilities in partnership with industry. vi. The draft planning statement lacks any detail as to how jobs targets will be achieved if the draft Central Sydney Planning Strategy is significantly amended or withdrawn. 	<ul style="list-style-type: none"> i. The City's capacity study, together with dwelling forecasts prepared by ID consulting has been used to guide the City in establishing its housing targets. While the latter is in some part informed by historical completion rates, it also takes into consideration a range of other demographic trends as well land availability and planning factors. Notwithstanding this, taking into account the housing that has been already built since 2016 and assuming completion of housing in the development pipeline (under construction, a development application has been lodged or a development application has been approved), only 3,519 dwellings (including 3,461 private and 58 non-private dwellings) are required to achieve the aggregated 0-10 year dwelling target. It is highly likely this can be achieved by development unforeseen at this time (given the average number of dwellings for which a development application was lodged between 2008 and 2018 was 4,400 per year). For the 10-20 year period, the City's capacity study has identified sufficient capacity under the City's planning controls and on NSW Government sites to contribute 18,092 private dwellings to the District target in the 10 years to 2036 (2027–2036). However, it is acknowledged that development opportunities are likely to be more constrained in this period. ii. The City acknowledges the theoretical nature of the capacity study and reiterates it is a point-in-time study that will change over time as sites develop, planning controls change, market trends shift and site availability becomes more constrained. Notwithstanding this, the capacity study provides a solid ongoing evidence base for understanding the capacity of the City's planning controls to facilitate the housing targets. The City will continue to annually audit and report development outcomes, and every five years, in line with the census and the City's Floor Space Employment Survey, undertake a capacity study to ensure the City's planning controls remain fit for purpose. iii. It is acknowledged that some sites that have been excluded from the City's capacity calculations may indeed develop in future. To this extent, the Capacity Study is reasonably conservative in terms of the forecast floor space availability. iv. While the capacity study excluded sites with less than 100 square metres capacity to account for those sites

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	<p>unlikely to develop. It is not unreasonable to assume those sites with more capacity may redevelop over the next 20 years. Notwithstanding this, the City is cognisant that not all identified capacity may be realised and will continue to annually audit and report development outcomes, and every five years, in line with the census and the City's Floor Space Employment Survey, undertake a capacity study to ensure the City's planning controls remain fit for purpose.</p> <p>v. The City agrees that monitoring the progress of the district and the region is essential to ensure the ongoing implementation of and alignment of councils planning statements with the Greater Sydney Commission's Region and District plans and with local community plans. It is noted the City's capacity study is one of the most detailed and reliable sources of information to assist in this. The City will report annually on the implementation of the planning priorities as part of its corporate reporting under the Integrated Planning and Reporting Framework of the Local Government Act 1993, and consider the inclusion of key projects into the City's four-year Delivery Program and annual Operational Plan. The City will also report on a series of indicators to show progress towards the objectives of the strategic plans, including progress towards housing and jobs targets. The City will actively work with the DPIE and the Commission in their monitoring programs.</p> <p>vi. While the City has agreed to changes based on the Minister's announcement in December 2019, the objectives and intent of the draft Central Sydney Planning Strategy to support jobs growth remains the same. The new development controls will rebalance floor space incentives. This will stem the loss of employment floor space and ensure that as the city grows, new employment floor space is provided to accommodate projected jobs growth.</p>
Site specific requests to review planning controls	
<p><i>Site specific requests to review planning controls inside the strategic investigation area of Southern Enterprise Area (including North Alexandria precinct), Botany Road corridor and Oxford Street precinct, include:</i></p> <p><i>Southern Enterprise Area (including North Alexandria Precinct)</i></p> <ul style="list-style-type: none"> • 84 O'Riordan Street, Alexandria – request a greater density, height and general scale of development • 33-35 Morley Avenue, Rosebery – request a greater density, height and general scale of development • 30-32 Bowden Street, Alexandria – request a greater density, height and general scale of development 	<p>The City received over 30 submissions from landowners, pertaining to over 40 landholdings in the council area, requesting site-specific changes to the planning controls to facilitate increased density, including rezoning land and increases to floor space ratio and/or height. The majority of submissions state the changes are to facilitate increased development capacity for both residential and non-residential uses, which would contribute to housing and jobs targets. Some also outlined other public benefit outcomes that would be associated with the proposal, for example, more affordable housing.</p>

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<ul style="list-style-type: none"> • 202 Euston Road, Alexandria – request increased density such as that being considered for North Alexandria. Also request land dedication requirement be removed • 22 O'Riordan Street, Alexandria – request and increase to height and FSR • 13 – 21 Mandible Street, Alexandria – request to be consulted throughout the North Alexandria strategic investigation with a view to increase FSR and height • 7-11 Mandible Street, Alexandria – request to be consulted throughout the North Alexandria strategic investigation with a view to increase FSR and height • 27-43 Hiles Street, Alexandria – request to be consulted throughout the North Alexandria strategic investigation with a view to increase FSR and height • 1 Harcourt Parade, Rosebery – request to include 'centre-based childcare centres' in permissibility table • 20-24 Bourke Road, Alexandria – requests review of planning controls • 58-68 Euston Road, Alexandria – request review of planning controls in the Southern Enterprise Area • 49-59 O'Riordan Street, Alexandria – requests increased development capacity and more flexible approach to land use • 494-504 Gardeners Road, Alexandria – requests increased development capacity and more flexible approach to land use <p><i>Botany Road Corridor</i></p> <ul style="list-style-type: none"> • 171A-175B Botany Road, Waterloo – request more development potential for commercial and affordable housing opportunities • 74-88 Botany Road, Alexandria – request strategic review of planning controls be expedited to facilitate affordable housing • 216-220 Wyndham Street, Alexandria – request site be included in the Botany Road corridor study and the draft statement should be clear that mixed use will continue to be supported in the corridor <p><i>Oxford Street Precinct</i></p> <ul style="list-style-type: none"> • 21 to 35 Oxford Street, Darlinghurst – request increased height control • 156 Forbes St, Darlinghurst (National Arts School) – requests rezoning from SP2 – Infrastructure, Educational Establishment, to allow for additional uses <p><i>Site specific requests to review planning controls in strategic review area in Pyrmont</i>, that was identified by the NSW government, include:</p> <ul style="list-style-type: none"> • 26-32 Pyrmont Bridge Road, Pyrmont – request and increase to height and FSR • 102-110 Bowman Street, Pyrmont – request increased height and FSR controls 	<p>Broadly, submissions requesting site-specific changes to the planning controls fall into three categories, including those that are:</p> <ul style="list-style-type: none"> • located in an area identified in the draft planning statement for strategic investigation for changes to the planning controls; • located in Central Sydney and subject to the Central Sydney Planning Strategy; and • located outside an area identified in the draft planning statement for strategic investigation. <p>The draft planning statement cannot make changes to planning controls. Changes to planning controls can only be made following analysis of the strategic or site specific merits of a planning proposal, lodged under Part 3 of the <i>Environmental Planning and Assessment Act 1979</i>, to change the relevant local environmental plan.</p> <p>This submissions table does not provide an analysis of the strategic or site specific merits of submissions that propose changes to planning controls and receipt of these submissions does not constitute a planning proposal request under the Act.</p> <p>The draft planning statement identifies a number of strategic investigation areas in the council area where the City will investigate potential changes to the planning controls. These areas include:</p> <ul style="list-style-type: none"> • Central Sydney South • Pyrmont (in the areas identified for review by the NSW Government) • Southern Enterprise Area (including the North Alexandria precinct) • Botany Road corridor • Oxford Street precinct <p>It does not identify any individual sites where changes will be considered.</p> <p>Where submissions relate to sites within the strategic investigations areas identified in the draft planning statement, these submissions will:</p> <ul style="list-style-type: none"> • where located in the Southern Enterprise Area, Botany Road corridor or the Oxford Street precinct, submissions will be further considered as part of the future review of these areas and landowners will be invited to participate in further consultation as the City progresses its investigations. • where located in Central Sydney, submissions will be considered as part of the ongoing work being undertaken as part of the draft Central Sydney Planning Strategy. • where located in Pyrmont, submissions will be referred to the NSW Government for consideration in their review of the area.
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<ul style="list-style-type: none"> • 97 Quarry Street, Ultimo (Uniting Harris Community Centre) – request increase to FSR and height <p><i>Site specific requests to review planning controls in strategic review area of Central Sydney, include:</i></p> <ul style="list-style-type: none"> • 4-10 Goulburn Street, Sydney (Sydney Trades Hall) – requests to utilise the Heritage Floorspace Scheme • 377-383 Sussex Street, Sydney – request review of planning controls • 175 Liverpool Street, Sydney – is not viable with the 50/50 split in the Central Sydney Planning Strategy • 136-140 Elizabeth Street, Sydney – floor space should not be reduced under the Central Sydney Planning Strategy • 55 Shelley Street, Sydney – request review of planning controls • 691-693 George Street, Sydney – request review of planning controls • 695-699 George Street, Sydney – request review of planning controls • 76 Ultimo Road, Sydney – request review of planning controls • 217-219 Thomas Street, Sydney – request review of planning controls <p><i>Site specific requests to review planning controls on land outside of strategic review areas identified above, include:</i></p> <ul style="list-style-type: none"> • 365-373a Crown Street, Surry Hills (Salvation Army) – request development uplift that would support the provision of community services in the form of accommodation, education, counselling, training • 348-354 Elizabeth Street, Surry Hills (Salvation Army) – request review of FSR and height controls • 25 Belvoir St, Surry Hills (Belvoir Theatre) - request increase height and FSR to provide additional creative commercial office space • 18 Belvoir Street, Surry Hills (Belvoir Theatre) - request increase height and FSR to provide additional creative commercial office space • 71-81A Regent Street, Redfern – request review of planning controls to facilitate mixed use development • Broadway Shopping Centre – change the planning controls to allow a mixed use development with more height and FSR that currently available • 83-97 Darlinghurst Road, Kings Cross – request increased height and FSR to facilitate 12 story commercial development • 203 Victoria Street, Potts Point – request to review development capacity to facilitate a city shaping true transit-oriented development outcome • Notre Dame University – request increased development capacity to match surrounding development. Also request greater range of additional works that do not require consent 	<p>Where submissions relate to sites outside an area identified for strategic investigation in the draft planning statement, the draft planning statement does not identify any site-specific changes being considered by the City. It only focuses on areas and precincts identified in the draft planning statement for strategic investigation. Notwithstanding the above, the Act enables land owners to request the City prepare a site specific planning proposal. The City will assess any request, lodged with the appropriate fee and justification reports, on its strategic and site-specific merits.</p> <p>Only one minor amendment has been made to the draft planning statement following consideration of these site-specific submissions, which alters the boundary of the Botany Road Corridor investigation area. It has been expanded to capture the land both sides of Botany Road. Land east of Redfern Station north and south of Lawson Street is also included in the boundary to address land use and built form interface with the railway lands. The Redfern Estate Heritage Conservation Area was removed to help preserve the heritage qualities of the area. This boundary adjustment ensures alignment with the strategic vision for innovation and knowledge-intensive growth in the area.</p>

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<ul style="list-style-type: none"> • 180 Albion Street, Surry Hills – request increase to FSR and height • 41-43 Stanley Street, Sydney – request increase to FSR and height • 63-71 Alexander Street, Alexandria – request increase to FSR and height • 66 Darlinghurst Road, Potts Point (Uniting Medically Supervised Injecting Centre) – request increase to FSR and height • 480 Elizabeth Street, Surry Hills (Opera Australia) – request to review planning controls to permit residential, non-residential, cultural and creative uses. • 273-293 Botany Road, Waterloo – request greater development capacity owing to the site being near the Green Square Town Centre 	
Infrastructure - general	
<p><i>Submissions from industry and peak development bodies</i></p> <p>i. The City's commitments identified in the draft planning statement are likely to increase contributions and costs associated with new development. While important, these should not lead to unreasonable development costs and feasibility outcomes.</p> <p>ii. The City should be engaging in partnerships to utilise the large and accessible plaza in Green Square for various activities and programs.</p> <p>iii. The application of 'unplanned growth' concept (i.e. growth beyond potential identified capacity) to projects negatively assumes sub-standard quality and drain on existing community. Projects arising after planning controls have been finalised can be achieved effectively through planning proposals. The term 'unplanned growth' should be deleted from the draft planning statement.</p> <p>iv. A new fixed-rate on public infrastructure contributions and a review of all existing contributions in place should be considered.</p> <p>v. The mechanisms proposed to fund infrastructure in the draft planning statement are unclear.</p> <p><i>Submissions from State agencies</i></p> <p>vi. TfNSW recommends any changes in the LEP should cover setbacks from the rail corridor which are considered for prospective new builds and adherence to FSRs.</p> <p>vii. TfNSW suggests the City note proposed centres around stations and corridors expected to significantly increase</p>	<p>i. Noted. In the first instance, the draft planning statement makes no immediate changes to planning controls and therefore no increase in contributions and development costs. Actions that identify future projects that impact development will consider all planning impacts, including feasibility costs and impacts.</p> <p>ii. The City runs a series of place-making programs and community events to activate its public assets in the Green Square town centre, including the Community and Cultural Precinct and the Green Square Library and Plaza. Some of these programs are part of the City-wide programs such as the Green Square Christmas Fair and the Lunar New Year, both of which take place in the Green Square Plaza. Other programs are more specific to the Green Square area and seek to stimulate creative participation and build social connection. The City welcomes the collaboration with stakeholders in place-making programs in Green Square. Some events are run in partnership with stakeholders active in the area, for example 107 Projects, City West Housing and Mirvac. Examples of these activities and events include the Winter Warmer series, Outdoor Cinema, Community Lunch, and the touring 'Cartographica' exhibition at the Joynton Avenue Creative Centre. The City is currently developing a program of events for 2020 for the Green Square Plaza.</p> <p>iii. The draft planning statement has been prepared based on the planned growth identified in the Capacity Study, which has informed the housing and jobs targets. No changes are required to current planning controls to achieve the planned growth. The term 'unplanned growth' is important to highlight and recognise that infrastructure demand will need to be satisfied by any</p>

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<p>population and economic, social and employment activities. The City should continue to collaborate with TfNSW at each stage of strategic planning process including the LEP review.</p> <p>viii. TfNSW notes future development releases should be aligned with appropriate infrastructure and the capacity of the public transport system. Development should be restricted until capacity of the public transport system can be increased to overcome congestion.</p> <p>ix. Sydney Water recommends Council to regularly inform changes to projected population, dwelling and employment data to ensure growth is aligned with infrastructure delivery.</p> <p>x. Sydney Water recommends Council consider appropriate land use zoning for water related operational infrastructure. Sydney Water will provide advice to Council on appropriate zoning of its infrastructure as part of future amendments to the LEP.</p>	<p>unplanned growth (i.e. development capacity over and above what is recognised under existing planning controls). This will ensure alignment of development with infrastructure.</p> <p>iv. Action I2.7 in the draft planning statement states that existing development contributions plans will be reviewed regularly.</p> <p>v. It is important that as growth occurs there is adequate infrastructure to support the growing community. Action I2.6 in the draft planning statement states that the City will continue to implement existing mechanisms that fund infrastructure (i.e. development contributions, community infrastructure scheme) as well as investigate and develop other mechanisms to manage infrastructure demand as a result of development in Central Sydney or strategic investigation areas or sites that are subject to changes in planning controls.</p> <p>vi. Noted. <i>State Environmental Planning Policy (Infrastructure)</i> and the Department's Development Near Rail Corridors and Busy Roads – Interim Guideline is used in conjunction with planning controls to determine building envelope of developments located adjacent to rail corridors. These controls help to ensure amenity is maintained.</p> <p>vii. Noted. The draft planning statement identifies that growth will occur on NSW Government sites. The City will continue to collaborate with TfNSW at different stages of the planning process.</p> <p>viii. Noted. TfNSW comments align with the draft planning statement, which highlights that any proposal to change planning controls must consider the Principles for Growth, including that development must be located within reasonable walking distance of public transport that has capacity.</p> <p>ix. Noted.</p> <p>x. Noted.</p>
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Infrastructure – transport and access

Submissions from industry	
<p>i. There is support for the City's vision to work with NSW Government to deliver an East-West Transit Corridor.</p> <p>ii. There is support for the City to advocate for a metro station at Pyrmont.</p> <p>iii. Woolworths would like to partner with the City to demonstrate how innovation in transport methods and loading dock technology are fundamentally changing the</p>	<p>i. Noted.</p> <p>ii. Noted.</p> <p>iii. In response to the changing nature of retail and increased demand for last mile deliveries, the City is undertaking a review of its controls for service vehicle parking and loading docks in new developments. This study will involve research to better understand how retailers in the city are using freight and delivery services, and how this may change in the future. The City is also undertaking</p>

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<p>nature and amenity of retail development. Woolworths would like these new features incorporated into the City's planning controls.</p> <p><i>Submissions from community groups</i></p> <p>iv. The Paddington Society encourage the City to work with Woollahra Council and Transport for NSW to make the intersection of Oxford Street and Moore Park Roads to be more pedestrian friendly and attractive.</p>	<p>a study into loading zone usage in Central Sydney to understand how our local streets and on-street parking are performing in response to increased delivery and freight movements. The City welcomes the opportunity to work together with retailers to improve outcomes.</p> <p>iv. The City will investigate District wide active transport networks, including separated cycleways along key corridors, and will collaborate with all neighbouring councils on delivery of the Green Grid.</p>
Infrastructure - open space and community infrastructure	
<p><i>Submissions from industry</i></p> <p>i. Walker requests contributions towards infrastructure and Affordable Rental Housing be levied equally from projects of similar scale, type and location, irrespective of whether they were anticipated in plans or not.</p> <p><i>Submissions from community groups</i></p> <p>ii. Chippendale Residents Interest Group recommends:</p> <ul style="list-style-type: none"> • communities having access to green space that is not across heavily trafficked roads • dense suburbs such as Chippendale need more green space within the suburb, and greater parity with other suburbs. 	<p>i. Action I2.6 in the draft planning statement identifies that mechanisms will be developed to fund infrastructure required for a growing community. Development feasibility and impact on development viability will be considered as part of preparing any new contribution mechanism.</p> <p>ii. The draft planning statement acknowledges the importance of open space in making cities liveable and healthy, as well as the challenges of providing additional open space in high density environments. The actions in Priority I3 outline ways the City will maintain and plan for quality open space into the future. These include:</p> <ul style="list-style-type: none"> • Action I3.1(b) to apply the City's adopted Open Space, Sport and Recreation Needs Study 2016 to improve the accessibility, capacity and function of open space and recreation facilities • Action I3.1(c) to create a network of open space and recreation facilities by improving walking and cycling connections through the city, including the delivery of the liveable green network, • Action I3.1(d) to co-locate facilities to provide a range and distribution of recreation, sporting and cultural opportunities • Action I3.2(b) by planning to increase public open space provision to meet or exceed 15 per cent of the City's total land area, and Action I3 .3(b) to partner with other councils, NSW Government and other stakeholders to share open space and recreation facilities.
Open space and outdoor recreation	
<p><i>Submissions from community/interest groups</i></p> <p>i. The slacklining community is growing and is in need of spaces to practice the sport. The Australian Slacklining Association would like to partner with the City to develop an operating policy for slacklining. Open space that supports a variety of recreational and passive uses, including slacklining, should be an important consideration when planning for existing and new open space.</p>	<p>i. The draft planning statement recognises that open space is essential for liveable, healthy cities and that as local areas continue to grow and change, the planning and management of open space will need to ensure that communities are provided with quality, safe and attractive open spaces, which respond to recreation needs and trends, and support wellbeing and social</p>

	<p>cohesion, particularly in high density areas. The draft planning statement is a high-level land use focused 20 year plan for the city and explicit reference to slacklining is too specific for the purposes of this project. Specific uses of parks are dealt with in the City's parks plans of management.</p>
Infrastructure – transport and access	
<p><i>Submissions from community groups</i></p> <p>i. Chippendale Residents Interest Group recommends the City review the Parkway proposal and integrate the following as part of City's Liveable Green Network priorities and as action items in the draft planning statement:</p> <ul style="list-style-type: none"> • North-South green connector route linking ATP with UTS and City through the Block and Chippendale • East-West routes linking USYD and UNSW. 	<p>i. Priority I1 discusses the City's Liveable Green Network which aims to create a pedestrian and bike network connecting people to Central Sydney and village centres as well as major transport and entertainment hubs, cultural precincts, parks and open spaces. The Liveable Green Network identifies a number of linkages through Chippendale, connecting to UTS, and to the ATP site in Eveleigh.</p> <p>Priority I1 also discusses the potential to improve east-west movement across the city, which could include mass transit options as well as improved walking and cycling connections.</p>
<p><i>Submissions from industry</i></p> <p>ii. The draft planning statement states Council will investigate "freeing up space on roads by moving freight and servicing activities off-street and out of peak times of people activity." We seek clarification of the intent of this reference and the implications for warehouse deliveries and intensified business/commercial presence in the Green Square-Mascot Strategic Centre.</p> <p>iii. SHMH supports plan to extend the Sydney Metro West to the south east with a station at Zetland is unreservedly supported. The vision for the subject site responds to the planned increase in accessibility of the site and is consistent with the strategic intent for Green Square.</p> <p>iv. Recommend the renewal of the Precinct (a number of lots between Bourke Road and O'Riordan Street, Alexandria) as a high density commercial area. This will serve as a significant opportunity to improve walking and cycling connections in the Alexandria area.</p> <p>v. Mirvac notes the following:</p> <ul style="list-style-type: none"> • it supports the City's advocacy for the delivery of a new metro station on the proposed Sydney Metro West line, by 2028, at Green Square (Zetland) • it would like to work with the City to advocate for a light rail from the Bays Precinct (Glebe Island) to Central Sydney to support the Innovation Corridor, and advocate for a mass transit solution from Green Square to Central Sydney to support local trips. • it strongly supports the City's intention to move people more easily by prioritising streets for walking and cycling and expanding the pedestrian and open space network and encourages the City to explore 	<p>i. As the population grows in the council area so does the demand on road space. Rather than creating more road space at the expense of "place" we are looking to use it in a more efficient manner. This includes looking for opportunities to relocate on-street kerb side uses to off-street locations to enable opportunities for footway widening, surface public transport priority or cycling infrastructure. We are also looking for opportunities to increase efficiency by managing the road space to support different users at different times of the day, this could be through kerbside restrictions, signal phasing or other innovations. The aim is to provide space for people and place making to occur in the hours of maximum benefit. This could include discouraging traffic movements around rail stations during the morning and afternoon peak when people walking to the stations is the dominant mode. Current examples of this include peak hour bus lanes, or late night taxi ranks. The City will need to undertake further investigation to determine which areas and roads will be targeted for interventions.</p> <p>ii. Noted. The City will continue to advocate for a metro station at Zetland.</p> <p>iv. This issue relates to a request to masterplan an area predominantly located within the North Alexandria Precinct. It includes improved walking and cycling connections presented as a potential public benefit to support this proposal. It is noted that the City's proposed Green Square to Ashmore Connector road is seeking to improve connections between these streets. Any unplanned growth beyond that planned for under the</p>

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<p>further opportunities to pedestrianise City streets as a means of giving effect to this key move</p> <ul style="list-style-type: none"> • it supports the City's approach to infrastructure delivery across the Eastern City District • It supports the location of a new Pyrmont Metro station • it recommends the City also advocate for the necessary upgrades of the existing Green Square heavy rail station to cope with peak demand. <p>vi. The City should advocate for new Sydney West Metro stations at Pyrmont and Haymarket.</p> <p><i>Submissions from peak bodies</i></p> <p>vii. The Property Council:</p> <ul style="list-style-type: none"> • supports actions include advocating for delivery of new metro stations on the Sydney West Metro Line at Zetland and Pyrmont • supports improving public and active transport in the CBD • supports a new transport service in the innovation corridor. <p><i>Submissions from individuals</i></p> <p>viii. The City has reduced car dependency and without support by NSW Government. If given more control over the planning process, the City could extend pedestrian friendly circulation space. Other cities provide examples of how to overcome car dependency. Copenhagen has converted thoroughfares to pedestrian uses, populating the downtown, improved cycling infrastructure, reducing number of private cars and car parking space.</p> <p>ix. Prioritise connecting the west of the City (e.g. Forest Lodge, Camperdown and Glebe) with the CBD and the East. This connection should include a metro station at Broadway or Sydney Uni.</p> <p>x. Promote the acceleration of St Johns Road as a separated cycleway.</p> <p><i>Submissions from agencies</i></p> <p>xi. The SLHD supports:</p> <ul style="list-style-type: none"> • metro stations at Camperdown, Green Square and Randwick or the airport and creating a positive effect on the health and wellbeing of the population • The City creating a city for walking and cycling, with a specific goal of creating walkable neighbourhoods where community members can walk to fresh food outlets, parks, public transport and primary health services within 5-10 minute • managing vehicles in walkable neighbourhoods where space and priority is given to people walking (e.g. road 	<p>draft planning statement needs to be carefully considered as part of the planning proposal process.</p> <p>v. The comments raised are noted, including the need to address transport pressures in and around Green Square, which is discussed in the Infrastructure section of the draft planning statement.</p> <p>vi. Sydney West Metro stations have been announced by the NSW Government. The City is recommending a station at Pyrmont as detailed in Priority I1, to support employment growth in this part of the city. The City also recommends a Metro station at Central, as discussed in Priority P1, and Action P1.7 in the Productivity chapter of the draft planning statement, which would provide connections to the light rail route through Haymarket. Clarification has been provided in the draft planning statement identifying the metro stations that have been confirmed by the NSW Government, those still under investigation by the NSW Government, or those recommended by the City.</p> <p>vii. Noted.</p> <p>viii. Noted.</p> <p>ix. The draft planning statement discusses the challenges of moving east-west across the city. Several actions are included aiming to address these issues including: <ul style="list-style-type: none"> • Actions I1.1 and I1.10 recognising the City collaborating with stakeholders to break down physical barriers to moving across the city via improved walking, cycling and public transport connections; and • Action I1.8 specifically identifying the need to investigate an east-west corridor, but not committing to specific transport modes or stations, as this investigation is at early stages. </p> <p>x. Priority I1 outlines the City's approach to encouraging walking and cycling. Actions I1.1 and I1.2 identifies that this is to be achieved through the implementation of the City's cycling strategies, rather than identifying individual cycleways for implementation or expansion. Any requests to prioritise or expand cycle routes should be considered as part of any review of the City's cycling strategies, rather than the draft planning statement. It is therefore recommended that no change to the Planning Statement be made on this issue.</p> <p>xi. The City acknowledges the benefits mass transit will bring to the health of the population and the Camperdown-Ultimo Health and Education Precinct. The City is working on a transport strategy and plan with Transport for NSW and the Camperdown-Ultimo Alliance that will consider mass transit options for the Camperdown-Ultimo Precinct.</p>
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<p>space reallocation, priority at crossings, managing speed and managing through traffic).</p> <p>xii. TfNSW supports Council's priority to develop walkable neighbourhoods in identified areas including Central Sydney.</p> <p>xiii. TfNSW recommends rewording 'Facilitates improved environments for people walking and cycling' to 'promotes and facilitates improved access for people to walk and cycle as a means of access' for Action I1.5.</p> <p>xiv. TfNSW recommends indicators to measure walking and cycling activities and incorporate following indicators for 'Walkable Places' in Region Plan:</p> <ul style="list-style-type: none"> • Trips by walking (% of all trips) • Trips to work by walking and cycling (% of trips to work) • Access to open space (% of population within 400m walk of local open space). <p>The draft planning statement should also identify support for Premier's Priority (11) Better Environment - Greener public spaces.</p> <p>xv. TfNSW recommends expanding Action I1.1 (d) to ensure identified walking and cycling links (and site permeability) are delivered by the City's development controls and planning policies.</p> <p>xvi. TfNSW supports walking and cycling. Whilst some footpaths are narrow, the removal of street furniture and footpath dining and larger building setbacks in areas should be considered to allow larger spaces for pedestrians and improve place function. Footpath widening should consider needs of public transport and freight, reflecting the high movement function of those corridors.</p> <p>xvii. Land uses associated with Southern Enterprise Area are heavily reliant on freight and Council needs to consider reliability of freight movements. Proposals must demonstrate sufficient off-street loading capacity to ensure freight and servicing tasks support place outcomes and not rely on kerbside capacity.</p> <p>xviii. TfNSW recommends the draft planning statement identify measures to develop a network of safe cycling routes and local streets, to help future-proof neighbourhoods for new forms of micromobility including:</p> <ul style="list-style-type: none"> • ensuring new walking and cycling links are designed to comfortably cater for emerging and future forms of micromobility • providing complementary infrastructure, such as bike parking, that can be used by other micromobility devices. 	<p>xii. Noted.</p> <p>xiii. The City recommends retaining the certainty provided by the proposed wording that any land use framework developed will directly facilitate improved environments for walking and cycling as opposed to only 'promoting' improved 'access'. Facilitation speaks to delivery and environments speaks to physical outcomes as opposed to changes to access arrangements.</p> <p>xiv. The draft planning statement includes following transport and access indicators: <ul style="list-style-type: none"> • length of separated cycleways provided annually • growth in cycling activity at key intersections around the City of Sydney (100 key intersections) • growth in walking activity at key locations around City of Sydney (100 key locations). These are annual indicators to which the City has ready access to data. The indicators recommended by TfNSW are supported however data may not be available for the recommended indicators annually. They are more likely to be available every 5 years. Therefore they would be more appropriate to report on through the City's transport and access strategies every 5 years. </p> <p>xv. Action I1.1 already refers to the review of development controls for walking and cycling in the city, in order to deliver new walking and cycling links.</p> <p>xvi. Priority I1 of the draft planning statement addresses the multiple users of the City's road network and the associated challenges. Actions I1.1 and I1.2 outlines the City's priority for managing the road network as it directly relates to place-based planning and the draft planning statement's vision for growth over the next 20 years. They also acknowledge that increasing the place function of streets will be a 'transition' and that consideration will be given to the demand for vehicular traffic along the respective corridors. The actions also detail that the City will always work with land owners to deliver new, improved and safe walking connections, including localised setbacks to manage footpath crowding. The rationalisation of street furniture will always be a consideration in relation to improving footpath capacity. However, the City will always prioritise the provision of appropriate place making elements, like street trees, in line with the Premier's tree canopy priority.</p> <p>xvii. Noted. Priority I1 addresses freight and servicing at objective (f) and in action Action I1.3. Catering for and continuing to support service, freight and delivery vehicles in a growing city is clearly acknowledged as a priority for the City. Action I1.3 details the innovative</p>
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<p>xix. Future rezoning consider bus priority improvement measures to ensure efficiency including setbacks allowing road widening for buses, cycling and walking networks.</p> <p>xx. TfNSW recommends the City make specific reference to the implementation of travel behaviour change programs to manage demand and require new developments and businesses in key precincts to develop and implement travel plans in order to align with the Region and District Plans. TfNSW also recommends making reference to 'Travel Choices' which is TfNSW Travel Demand Management Program.</p> <p>xxi. TfNSW recommends working with Council on further speed reductions</p> <p>xxii. TfNSW recommends the City to consider specific streets / areas for review including overcrowding at Parramatta Road and Broadway, speed limits for Oxford Street impacting movement and congestion, need to integrate Cope and Wellington Streets into City's Liveable Green Network and considering Harris Streets and Cleveland Streets as a bypass route for traffic.</p> <p>xxiii. TfNSW notes land uses associated with the Southern Enterprise Area are heavily reliant on freight. To cater for this, Council needs to consider the reliability of the movement. More generally, proposals must demonstrate sufficient off-street loading capacity, and a means of managing this capacity, to ensure that the freight and servicing task supports place outcomes and does not rely on kerbside capacity. Botany Road is an important route, providing access to freight and dangerous good vehicles to ports and public transport.</p> <p>xxiv. TfNSW supports Council's action to incorporate accessibility planning when planning access to open space and sportsgrounds. Early engagement with TfNSW is necessary at the outset prior to site selection, improvements to existing facilities and use of recreation facilities outside of Council ownership. Future repurposing of car parks can also provide recreation spaces.</p>	<p>opportunities the City will promote in order to accommodate essential freight and servicing, whilst minimising its impact, including open-access loading docks, shared servicing facilities and dedicated small delivery consolidation points for 'last mile' delivery.</p> <p>xviii. Action I1.1 in the draft planning statement speaks to implementing Council's cycling strategy, which was updated in 2018. Additional transport detail in relation to cycling is more appropriately addressed in any update to the City's cycling and transport strategies.</p> <p>xix. Bus priority improvement measures are the responsibility of NSW Government. It is inappropriate for the draft planning statement to resolve any regional network bus, cycling or walking capacity issues through adhoc requirements for building setbacks and road widening. This practice has occurred in the past on road corridors including Elizabeth Street where localised setbacks were achieved and road widening was later abandoned.</p> <p>xx. The suggested action is already addressed by Action I1.1 c) which states that the City will work with building owners and businesses to encourage walking and cycling through active workplace strategies and provision of end-of-trip facilities.</p> <p>xxi. Noted.</p> <p>xxii. Noted. These issues are for the City to note, and will be addressed through collaboration between the City and the NSW Government, as outlined in Actions I1.1 and I1.2.</p> <p>xxiii. Noted. Priority I1 addresses freight and servicing at objective (f) and in Action I1.3. Catering for and continuing to support service, freight and delivery vehicles in a growing City is clearly acknowledged as a priority for the City. Action I1.3 details the innovative opportunities the City will promote in order to accommodate essential freight and servicing, whilst minimising its impact, including open-access loading docks, shared servicing facilities and dedicated small delivery consolidation points for 'last mile' delivery.</p> <p>xxiv. Priority I2 addresses the need for the City to collaborate with NSW Government agencies to plan and deliver infrastructure to support growing communities, and this would include the provision of new and expanded public open space. Actions I2.3 and I2.4 seek to implement this approach.</p>
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Liveability – general	
<i>Submissions from community/interest groups</i>	
<p>i. The planning system be one that facilitates the development of more space that create the opportunities for new businesses and services to meet the basic and aspirational needs of a local community together with a diversity of innovative, creative, cultural and artistic experiences appealing both to a local and broader Sydney population. The City should review the controls contained within the LEP in regard to Glebe Point Road. On the eastern side between Parramatta and Bridge Roads it is recommended the building height facing the rear lanes be increased from 9.0 metres to 12.0 metres and the Floor Space Ratio of sites be increased from 1.5:1 to 2:1, with a bonus of 0.5:1 where development is for commercial enterprises.</p> <p>ii. The Sturt Street Residents Association would like direct input in a future public consultation process as part of the proposed Oxford Street Activity Street Study. The Association is concerned about LEP/DCP provisions and the scope of development at the rear of Oxford Street properties and potential impacts on the residential amenity of south side of Sturt Street.</p> <p>iii. Many businesses simply don't care about disturbing residents. There is not enough being done about the impact of noise from business in Elizabeth Bay.</p> <p>iv. In Elizabeth Bay, council is slowly wrecking the local character by filling up soil tree beds with sand and Tarmac getting rid of our black asphalt footpaths and foliage.</p> <p>v. Belvoir owns two significant buildings in Surry Hills - the iconic theatre at 25 Belvoir St and our warehouse at 18 Belvoir Street. It is recommended:</p> <ul style="list-style-type: none"> • Clear wayfinding signage for the theatre is essential. • To encourage walking, the streetscapes need to be enhanced – better footpaths, increased vegetation, good lighting. • introduce a designated walking track from the light rail station through Ward Park, along Belvoir St and onto Prince Alfred Park. • modest realignment of the public domain of Belvoir Street that might see it become a shared pedestrian zone largely free of through traffic • parking spaces near the theatre. <p>vi. Chippendale Residents Interest Group recommends as part of the City's strategy to create Great Places and improve Liveability, include specific priorities to reduce the impact from noise and sleep disturbance in the draft planning statement, with appropriate actions.</p>	<p>i. Glebe Point Road has been identified in the draft planning statement as an activity street. The City will undertake a study of its activity streets to better understand their role, function and character and ensure the planning framework supports the contribution these places make to their communities. The planning controls for this section of Glebe Point Road may be reviewed as part of this study and this submission will be considered at that time.</p> <p>ii. The concerns regarding the potential impact on amenity are noted. Work to review the planning controls along Oxford Street will soon commence and as part of that process the Sturt Street Residents Association will be involved in consultation and the formal exhibition of the project.</p> <p>iii. The City investigates complaints received in accordance with its compliance policy.</p> <p>iv. The City carries out streetscape improvements in accordance with its design standards and guidelines.</p> <p>v. Priority L2 of the draft planning statement addresses the need for liveable and walkable neighbourhoods. Many of the measures implemented will result in changes to the Crown/Baptist Street village.</p> <p>vi. Action L2.8 seeks to protect people from urban hazards and create places with high levels of amenity by better managing noise through planning controls to protect people's health and support activities including transitioning noise criteria to improve levels. This will be achieved by working with others to develop strategies to reduce environmental noise.</p> <p>vii. Noted.</p> <p>viii. Noted.</p> <p>ix. This is recognised in the pop-out box about visitor economy. P1.2 and P2.4 are focused on supporting an appropriate mix of land uses, including those that support the visitor economy while ensuring that growth opportunities for commercial and enterprise use are not compromised.</p> <p>x. Noted.</p> <p>xi. The draft planning statement makes reference to the Cycling Strategy and Action Plan 2018-2030 to help improve movement and connectivity across the city. This Plan has maps illustrating the regional and local bike</p>

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<p><i>Submissions from industry</i></p> <ul style="list-style-type: none"> vii. There is strong support for the approach of a people focused urban design in the creation of vibrant places and neighbourhoods for all ages and abilities with accessible high quality shared places and spaces that are well connected by public and active transport networks. viii. The draft planning statement outlines that Council is undertaking a study of its activity streets to better understand their role, function and character. The proponent generally supports this approach. ix. The draft planning statement should specifically recognise the important role of tourist and visitor accommodation in the achievement of the priorities under this plan. x. A site-specific approach to built form testing on Site Specific Planning Proposal sites is supported. xi. The City should work with the University of Notre Dame to identify development controls to identify new walking and cycling links at the campus. xii. The City should prioritise and commit to creating a high amenity environment along Broadway to foster social interaction and economic vibrancy within this well-connected, liveable and walkable neighbourhood. xiii. The City should continue to collaborate with stakeholders involved in the design excellence process and to allow the criteria to evolve with emerging trends. xiv. Council may wish to consider a future amendment to its Competitive Design Policy to clarify the alternative process for approval or endorsement of a Design Excellence Strategy where a Concept DA is not required. xv. The development of principles to guide site specific proposals, however the interpretation of the principles could be overly restrictive and prevent development, particularly where it may be more viable than capacity that has already been assumed to be delivered (despite being unviable). xvi. Action 12.8 seeks to protect people from urban hazards and create places with high level of amenity by better managing noise through planning controls to protect people's health and support activity including transitioning noise criteria to improved levels as environmental noise reduces. Where this action will have direct consequences on the property industry, further consultation is required. xvii. The Environmental Protection Authority supports commitments to promote conditions for active transport to reduce emissions and improvements to air quality through green roofs and walls. It supports the range of 	<p>networks and indicates what has been completed and what is planned/upgraded. Identification of other local walking and cycling connections can be considered upon the review of this plan.</p> <ul style="list-style-type: none"> xii. Action I1.2 seeks to work with the NSW Government to plan for the transition of streets to 'people first' places, so streets are quieter, cleaner and greener with increased footpath capacity throughout the city. This action lists Broadway and its side streets as a priority. xiii. The City will soon commence a review of its Competitive Design Policy to clarify process and procedures. This submission will be considered as part of this review. xiv. The City will soon commence a review of its Competitive Design Policy to clarify process and procedures. This submission will be considered as part of this review. xv. The Principles for Growth provide a local merits test to guide the Council in the consideration of, and consistent decision-making about, planning proposals in the local area. The viability of a site, while being an important consideration in assessing planning proposal requests, does not negate the need for the request to align with the Principles. xvi. Noted. xvii. Support is noted. The City will consider the contribution to air pollution from wood burning in our LGA. Action S3.1 takes measures to ensure air pollution is addressed by NSW Government to get a regional approach to managing air pollution.
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<p>opportunities in the draft planning statement to help better address noise management, for example delivering design excellence, reviews of industrial/urban services land and careful planning of mixed use precincts. It recommends:</p> <ul style="list-style-type: none"> • further steps could be taken to reduce impacts from air pollution from wood burning. • the draft planning statement should strengthen provisions for setbacks to reduce air quality impacts on residents. 	
Heritage	
<p>i. The Glebe society recommends:</p> <ul style="list-style-type: none"> • the appropriate controls are in place to allow the sensitive adaptation of buildings that retain and maintain the heritage significance of that building and also contribute to the heritage significance of the conservation area • the City should further protect all buildings that contribute to the Glebe Point Road Local Conservation Area, be they Heritage Listed or not, by requiring that all elements of heritage significance be maintained and reinstated, notwithstanding co-existence with any new rear redevelopment. • the City should further audit and assess those buildings of the 19th and early 20th Century so that buildings of significance are heritage listed for the benefit of future generations. <p>ii. The Paddington Society recommends:</p> <ul style="list-style-type: none"> • heritage protection and enhancement should be monitored and reported and should have its own indicators • the current solar and amenity controls are not onerous and should apply equally to all areas of the City, including heritage conservation areas, and are easily achieved with considered design. • FSR and height controls in the LEP are too coarse, and envelope controls for the major terrace types, and site specific DCPs for larger more complex infill sites are preferable. <p>iii. The Chippendale Residents Interest Group recommends:</p> <ul style="list-style-type: none"> • greater emphasis is given to the value of retaining the urban form in heritage conservation areas • specific objectives in the draft planning statement should be included to ensure that existing residential communities in low rise heritage conservation areas are retained. <p>iv. The City Plan 2036 fails to adequately recognise, protect and conserve our heritage.</p> <p>v. AMP Capital supports the principle of protecting and supporting the investment into Sydney's diverse heritage</p>	<p>i. The following is noted:</p> <ul style="list-style-type: none"> • The City is progressing a Modern Heritage Planning Proposal to list eight buildings and an artwork from the modern movement. The City acknowledges that sympathetic adaptation of former industrial buildings provide housing choices and workplaces that are not provided in new developments. Adaptive reuse of heritage items is dealt with under clause 5.10 of the Sydney LEP 2012 • the City's conservation area review looks at the role of contributory items in conservation areas. The City seeks to ensure new development in conservation areas conserve the heritage values of the place and is sympathetic to the built form, scale and fabric • a review of Sydney Development Control Plan 2012 is also being undertaken to improve the retention of significant features in conservation areas. <p>ii. The following is noted:</p> <ul style="list-style-type: none"> • the City currently has many systems and projects in place to ensure the rich heritage across the council area is preserved. State and local heritage items and heritage conservation areas are monitored through the State Heritage Register and through environmental planning instruments. Current processes in place are considered to be appropriate to facilitate the protection and enhancement of heritage. • the draft planning statement explains that historic built form results in lesser solar access than required for new developments. Current controls apply to all areas, but the heritage status of these buildings prevents any substantial changes to their built form that would improve solar access. • the Conservation Area Review is considering envelope controls for terrace housing in line with new controls recently applied to Millers Point heritage conservation area. <p>iii. Heritage conservation areas such as Chippendale are considered very important for their supply of housing choice and their opportunities for adaptive reuse of industrial buildings for housing and employment. The</p>

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<p>characteristics, however, the current HFS scheme requires critical revision to achieve intended outcomes, including:</p> <ul style="list-style-type: none"> • ensuring that a fair and equitable HFS system is put in place such that demand for HFS cannot outstrip supply • consistent and transparent processes, designed, documented and exhibited by the City of Sydney are essential to identify proposed heritage items, both now and into the future • the City must demonstrate that modern era buildings to be listed require the same level of upkeep and restoration as those older buildings constructed to different standards as currently identified on the register • conflicts of interest need to be identified and transparently managed given that the City owns buildings that are identified for heritage status given that the City designs, administers and controls the HFS system. <p>vi. The draft planning statement's action to review the existing HFS system is supported.</p> <p>vii. The Heritage Council of NSW recommends:</p> <ul style="list-style-type: none"> • considering how Aboriginal cultural heritage and cultural landscapes can be protected in Sydney LEP 2012. • considering the linkages between culture, heritage and tourism, and the opportunities culture and heritage bring for economic growth. • considering the linkages between actions and priorities to demonstrate how heritage contributes to the city. 	<p>Heritage Conservation Areas Review will ensure their significance is protected while providing housing and business diversity.</p> <p>iv. The City recognises that as Australia's oldest city, Sydney has many layers of history and culture embodied in places, landscapes and buildings. This is recognised through thousands of heritage listings of buildings and places of state, national and world heritage significance. The City's commitment to protect and preserve heritage is evidenced by Action L2.9, which lists the City's ongoing conservation actions.</p> <p>v. The City will monitor and review the HFS scheme as needed to ensure it remains an incentive for conservation, including by reviewing the awards, allocations and projected supply and demand. The ongoing review and maintenance of the HFS scheme is committed to under Action L2.9 of the draft planning statement. Action L2.9 also commits the City to undertaking heritage studies to identify and list places of local heritage significance ahead of demolition and as early as possible in the planning process. These reviews are and will always been done in accordance with the procedural and exhibition requirements of the Act and Regulations to ensure a consistent and transparent process. Listing and awarding HFS for City owned buildings also occurs through a consistent and transparent public process consistent with the approach for development applications and City owned properties. Submissions regarding HFS and the City's Modern Movement heritage listing will be addressed as part of that proposal.</p> <p>vi. Noted.</p> <p>vii. The following is noted:</p> <ul style="list-style-type: none"> • Action L2.9(a) in the draft planning statement aims to identify Indigenous and non-Indigenous places of local heritage significance in the LEP. • Priority L2 in the draft planning statement includes narrative relating to the important contribution that heritage and culture have towards the city's liveability, environment and economy. The productivity section of the draft planning statement also highlights the economic and tourist benefits of culture and heritage in the city. • The actions in the draft planning statement relating to heritage in the city will directly contribute towards achieving 'Priority L2 Creating great places' by ensuring planning controls continue to recognise and celebrate places of historical significance.
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Aboriginal and Torres Strait Islander People	
<p>i. The overview document only mentions Aboriginal people twice in its 22 pages, with page 10 being the first mention. We recommend an acknowledgement of the significant and original place Aboriginal people and culture have played and continue to play in the Sydney City Council (CoS) area early in the overview document (as is mentioned in the Introduction section of the draft planning statement).</p> <p>ii. An acknowledgement of the Aboriginal history should not begin by talking about 1788, which frames Aboriginal history only in relation to western history. The CoS's own webpage "The first Syneysiders" has much better wording.</p> <p>iii. Redfern is not only a suburb for creatives, education, technology and research. It has historically played, and continues to play, a significant role in Aboriginal political and social rights movement. It is where the first Aboriginal housing, legal and health services began.</p> <p>iv. To create a socially connected city, we recommend that one of the action items include, fostering/encouraging the celebration of and encouraging/supporting, Aboriginal culture and heritage.</p> <p>v. The heritage of Sydney is older than 1788 and what is left of that earlier heritage is also a priority. The document notes Aboriginal heritage is unbroken and continuing, and is not as widely celebrated or known. We recommend that the Aboriginal perspective is discussed first rather than second in this section (protecting Sydney's heritage) to assist in increasing the understanding of the importance of Aboriginal heritage.</p>	<p>i. The overview document is a supplementary document to the draft planning statement. The official acknowledgement to the Aboriginal and Torres Strait Islander community should remain with the official draft planning statement.</p> <p>ii. The acknowledgement that has been used in the draft planning statement has been reviewed and approved by the City's Aboriginal and Torres Strait Islander Advisory Panel. It is also consistent with other City strategies that have Acknowledgements.</p> <p>iii. The draft planning statement acknowledges the importance of the Redfern and Waterloo area to the Aboriginal and Torres Strait Islander community and has an action to work with others to prevent their displacement from the area.</p> <p>iv. The draft planning statement (i.e. liveability section) contains actions to conserve Indigenous places of local heritage significance and work with the City's Aboriginal and Torres Strait Islander Advisory Panel to identify strategies for recognition through land use planning processes, including designing with country.</p> <p>v. The wording in the draft planning statement has been reviewed by the Aboriginal and Torres Strait Islander Advisory Panel and is therefore considered to be acceptable.</p>
Housing - general	
<p><i>Submissions received from all groups</i></p> <p>i. Further work is needed to implement planning controls that encourage the delivery of models such as build-to-rent.</p> <p>ii. Consideration should be given to allow Build-to-Rent projects within commercial zones, consistent with the treatment of certain residential uses like hotels.</p> <p>iii. The City should host a forum that specifically addresses displacement of Aboriginal and Torres Strait Islander Communities. Community housing providers should be included in that discussion.</p>	<p>i. The City has a strong supply of rental housing, with about half of the city's residents living in rental accommodation. The planning system itself creates no impediment to build-to-rent development that is well designed and appropriate to the surrounding context. Regardless of whether housing is held by owner-occupier, individual investor or an institutional investor, all housing should be of a high standard, amenity and quality. As an emerging asset class in Australia, build-to-rent faces challenges outside the planning system compared to other forms of market housing from a developer perspective. The City does not support incentives in the planning system, such as floor space incentives or exclusion from the requirements of the apartment design code, to promote institutional ownership over owner-occupier or individual investor</p>

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<p>iv. Supports for actions to promote a mixture of dwelling types, tenures and sizes which will contribute towards the city's housing diversity and affordability.</p> <p>v. The City develop a new Action to simplifying the planning framework applicable to Green Square in order to ensure its timely delivery and completion.</p> <p>vi. Council need to consider and plan for the aging population that will comprise a significant number of people and households. Seniors housing is an important aspect of housing diversity and is an important aspect to ensure housing is provided for people of all ages and people with disabilities.</p> <p>vii. The planning priorities and actions should reinforce the role of centres and activity streets in satisfying the housing demands of the projected population growth. Planning Priority L2 should acknowledge the merits of housing growth in centres and activity streets to complement services and business and achieve genuine mixed use local centres.</p> <p>viii. In planning for the types of new homes residents will need in the future, the challenge for the City is to support social and cultural diversity through increasing housing diversity and choice. The City must continue to encourage and facilitate new ideas to deliver more diverse housing while increasing affordable housing supply.</p> <p>ix. The local housing strategy should promote housing diversity and should:</p> <ul style="list-style-type: none"> • encourage development which results in new households, or potential new households, rather than just larger households as tends to occur now • recognise co-housing (and a broader term of collaborative living) are important parts of the mix in a future Sydney • support mixed zoning, which allows for more interesting, diverse, and fun places to live • should not be all about be studios or one-bedroom units. Large, multi-generation families should also have a place close to the city if they want it. <p>x. There should be a more direct connection with the Liveable Housing Design Guidelines, and it shouldn't be restricted to larger scale developments.</p> <p>xi. The conclusion that people born overseas have a preference for high density living is not supported by evidence.</p> <p>xii. Density and heights should be maximised around transport hubs in order to preserve low-mid density characters areas of the Council.</p>	<p>ownership. Notwithstanding this, 'Priority L3 New homes for a diverse community' includes actions to increase housing diversity across the city, with build to rent being recognised as a form of development that is encouraged.</p> <p>ii. Build-to-rent (a residential use) and hotels (a tourist and visitor accommodation use) are not comparable uses. Build to rent is not supported in zones where residential uses are not permitted.</p> <p>iii. The City has an Aboriginal and Torres Strait Islander Advisory Panel which has been consulted with as part of the preparation of the draft planning statement and draft local housing strategy and will continue to be consulted as part of any further document reviews. Priority 3 of the local housing strategy and Priority 3 of the planning statement include action that the City work with the Aboriginal and Torres Strait Islander community, housing providers and the NSW Government to prevent the displacement of the community from the city.</p> <p>iv. Noted.</p> <p>v. The planning controls in the Green Square urban renewal area have been specifically created as part of a master-planning process to result in good built form and public domain outcomes for existing and future residents. The controls also ensure the delivery of critical infrastructure to support what will eventually be one of the densest areas of Australia.</p> <p>vi. The City does not have any planning control impediments to providing aged care developments in appropriate locations. Aged care is essentially a market product, however the City has implemented a number of mechanisms to encourage housing for older people such as, requiring a certain proportion of large residential developments to be adaptable dwellings, granting funds to the HammondCare Darlinghurst Project and towards the Holdsworth Community pilot (a HomeShare program). The City will continue to encourage housing that is suitable for older people through actions under Priority L3 in the draft planning statement:</p> <ul style="list-style-type: none"> - increasing housing diversity (e.g. larger apartments on the ground floor to allow people to age in place) - increasing the number of dwellings that are universally designed - encouraging co-operative living housing models - supported housing (which can benefit older people who require support to 'age in place').
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<p>xiii. Australian cities are evolving into high rise places with people living in tall buildings connected by public transport. Clear advocacy from local government on the benefits of high density housing is needed. Council should undertake advocacy as part of their communication strategy to assist the community understanding the need for, and benefits of, higher-density development in appropriate locations.</p>	<p>vii. Priority L2 in the draft planning statement has been amended to acknowledge that housing above street level may be appropriate in centres and activity streets.</p> <p>viii. Agreed. The draft Planning Statement and draft Local Housing Strategy include actions to promote housing diversity.</p> <p>ix. Priority L3 of the draft planning statement and the draft housing strategy address the need to increase housing diversity and choice in the council. As more people are living in higher-density developments, greater focus is needed to facilitate greater diversity and choice of housing that is fit-for-purpose and addresses the social and cultural needs of specific groups including residents on lower incomes, those who identify as part of the Aboriginal and Torres Strait Islander community, families with children, people with disabilities, older people, long term renters, students, people living alone, in share households and more. The City agrees there should be opportunities for different people to find a suitable home in the city. The draft planning statement and draft housing strategy identify that co-operative living is a mechanism that can be used by a community of people who voluntarily work together to meet their common housing needs.</p> <p>x. Sydney DCP 2012 currently requires a proportion of large residential developments to be provided as adaptable dwellings. In addition, the Apartment Design Guide requires that 20% of all residential dwellings incorporate the Liveable Housing Guidelines silver level universal design features. Action L3.2 states the City will investigate opportunities in the planning controls to increase the amount and improve the standard of housing that is universally designed. Action L3.4 also states the City will advocate to the NSW Government to deliver 100 per cent social and affordable housing to the Livable Housing Guideline's gold level on all NSW Government sites, in accordance with the target set by the National Dialogue on universal housing design.</p> <p>xi. The draft planning statement has been amended to say that this may indicate different housing preferences of people born overseas, including a greater cultural acceptance of apartment living.</p> <p>xii. Agree. The City facilitates this approach.</p> <p>xiii. The City is a strong advocate for high density living in appropriate locations where it is supported by adequate infrastructure.</p>
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<p>Affordable and social housing</p> <p><i>Submissions from peak housing bodies</i></p>	<p>i. Noted.</p>
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<p>i. The Community Housing Industry Association (CHIA):</p> <ul style="list-style-type: none"> • supports all of the actions proposed under L3.1 through to L3.6 • acknowledges that the delivery of social and affordable housing is primarily the responsibilities of the state and federal governments, but notes local government has an important role to play in addressing affordable rental housing need come through the leadership role local councils play helping to shape strong and diverse communities as well as through the planning system and determining local planning priorities • recognises the partnership between City of Sydney and City West Housing as an exemplar for partnerships between local government, state government and not-for-profit registered community housing providers • supports the use of State Environment Planning Policy no. 70 – Affordable Housing (Revised Schemes) as the principle mechanism for delivering affordable housing through the planning system in Sydney. <p>ii. Shelter recommend the draft planning statement / draft local housing strategy be amended to:</p> <ul style="list-style-type: none"> • exempt social and affordable housing from section 7.11 contributions • acknowledge that affordable housing is essential economic infrastructure will give Council flexibility in the future in how it finances delivery of more affordable housing through planning mechanisms • require a percentage of all new residential development should be dedicated to affordable housing. Shelter recommends for this to be delivered on site, or in the area if unpractical for the housing providers, to ensure social mix • include an action that the City takes the lead on development of a Regional Affordable Housing Strategy to operate across council borders • amend the action relating to renters to include clearly that it will advocate for reform of 'no-grounds' evictions that was recently recognised by the Productivity Commission • reviewing the draft housing strategy should not occur every 10 years. The review should instead align with the review of the LEP, which occurs every five years. <p><i>Submissions from peak development bodies</i></p> <p>iii. The draft planning statement should explore an incentive based approach to providing affordable housing [as opposed to a levy based approach] which will produce a greater number of affordable dwellings than contribution mechanisms.</p> <p>iv. The Property Council has previously expressed concerns regarding Council's Affordable Housing Review. The</p>	<p>ii. The following is noted:</p> <ul style="list-style-type: none"> • Contributions for social and affordable housing is already exempt from 7.11 contributions. • The City is committed to working with other levels of government, councils, the not-for-profit sector and the community to address housing issues. However the development of a district wide affordable housing strategy requires NSW Government leadership to address key issues. No amendment required. • The City's Affordable Housing Review planning proposal seeks to ensure that a percentage of all new residential development is dedicated for affordable or a contribution is paid for the purposes of affordable housing. This proposal is consistent with the Region and District Plans and does not impact development viability. Priority L3 in the draft planning statement has an action to implement this planning proposal. No amendment required. • The City agrees that affordable housing is critical infrastructure needed to service a socially and economically diverse global city. Additional wording has been included in Priority L3 in the draft planning statement and the draft housing strategy to this effect. • Agree. The narrative in Priority L3 of the draft planning statement has been amended by adding 'no-grounds' evictions' to the range of rental reforms that need to be explored to address renter uncertainty. • Monitoring and reporting to inform a review of the draft housing strategy will involve: <ul style="list-style-type: none"> - annual reviews of housing delivery and supply - five-yearly reviews of the evidence base and housing stock against the broader aims of the Region and District Plans - a 10 year review to ensure the 20 year vision, evidence base and planning contexts align with the implementation and delivery plan, goals of the community and broader aims of the Region and District Plans. <p>iii. Incentive schemes for affordable housing, such as those available under State Environmental Planning Policy (Affordable Housing) 2009 have limited effectiveness and not resulted in any affordable housing outcomes in the City of Sydney, though it has increased the stock of boarding houses and student accommodation. Incentive schemes generally rely on increasing development capacity beyond the existing planning controls, with associated impacts on amenity. The City's existing contribution schemes have resulted in over 650 affordable dwellings for low income households with more in the development pipeline – demonstrating this approach is effective in the City of Sydney context. The</p>
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<p>Property Council understands the Greater Sydney Commission is developing a process for the implementation of the housing targets identified in the Region Plan and Eastern City District Plan. We recommend Council continue discussions with the Greater Sydney Commission regarding its proposal to expand its affordable housing contribution scheme.</p>	<p>current rates in the scheme have been established following demonstration there is no undue impact on development viability. The City's affordable housing planning proposal considered the feasibility of development and prepared a phase in period to ensure development remains viable.</p>
<p><i>Submissions from Community Housing Providers</i></p>	
<p>v. Bridge Housing supports the measures for increasing affordable housing supply and recommends:</p> <ul style="list-style-type: none"> • further demographic and demand analysis inform the housing types and dwelling mix that should be delivered as part of the affordable and social housing dwelling targets • Council play an advocacy role for SEPP 70 to be applicable to a broad base of development. Also, SEPP 70 should be reviewed to take into account the maturation of the CHP sector since the SEPP 70 provisions were first implemented • that other zones [in addition to the B7 – Business Park zone] be explored for affordable housing • expansion of existing affordable housing provisions be considered across this LGA and that Council's Affordable Housing Planning Proposal be implemented as a priority matter • Council urge the State Government to enable more legislative force to such measures to ensure that housing delivery responds to a range of community housing needs. 	<p>iv. The City's Affordable Housing Review aligns with the requirements in the Region and District Plans. The proposed expansion of its contribution schemes will not impact development viability and will contribute towards the housing targets. The City will continue to advocate for the implementation of the Affordable Housing Review in consultation with the Department and the Commission.</p>
<p>vi. City West Housing recommends:</p> <ul style="list-style-type: none"> • the City's planning controls and assessment procedures that add significant cost to development may be waived for affordable housing. These controls include, but are not limited to: <ul style="list-style-type: none"> - the DCP controls that encourage the provision of additional bedrooms within attic levels or loft apartments should be flexible for affordable housing providers - the City's requirement for a competitive design process - the overly strict adherence to the ADG as a prescriptive measurement rather than guiding a merit-based assessment be relaxed. • a fast-track assessment process for affordable housing developments • where appropriate, on sites that are constrained by amenity impacts (such as those along busy corridors), controls be relaxed for affordable housing developments, noting the City's Draft Alternative Natural Ventilation of Apartments in Noisy Environments Performance Pathway Guideline • any review of controls in the vicinity of the new metro station should include a requirement for a proportion 	<p>v. The following is noted:</p> <ul style="list-style-type: none"> • the draft Housing Technical Report contains an evidence-based chapter that provides thorough analysis on demographics, housing demand and supply in the council area. It also provides evidence based research around affordable and social housing. This evidence-based research provides a solid framework that underpins the priorities and actions relating to housing in the draft planning statement and draft housing strategy • the City works with the NSW Government to continually improve affordable housing policy • permitting affordable housing in other employment zones in the Southern Enterprise Area is not supported. Residential uses in these zones would likely impact the flexibility with which businesses in these areas need to operate, for example truck movements, noise, dust • Priority 4 includes an action for the immediate implementation of the City's proposed levy • as above, the City works with the NSW Government to continually improve affordable housing policy. <p>vi. The following is noted:</p> <ul style="list-style-type: none"> • all buildings in the city, including affordable housing, should be designed to a high quality to provide good amenity and mitigate impacts to neighbouring properties and the public domain. The Apartment Design Guide is NSW Government's policy direction for residential apartment development in NSW, providing benchmarks for designing and assessing residential development. Affordable housing is a residential use and the City will continue to apply the ADG to ensure good design and amenity outcomes. Notwithstanding the above, this submission has been referred for consideration in the review of the City's LEP and DCP planning controls • the planning controls used to assess development applications provide a framework to achieve good

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<p>of any upzoned land to be dedicated as affordable housing in accordance with the same criteria applied in the City's recent Planning Proposal Affordable Housing Review.</p>	<p>design and amenity outcomes. Where development occurs that are subject to noise and air quality impacts, the development should address state government requirement (including the Apartment Design Guide) and the City's planning controls to manage and mitigate impacts. The design and quality of affordable housing should not be compromised when located in these sensitive areas, particularly as they house long term renters in the council area.</p>
<p><i>Submissions from industry</i></p>	<ul style="list-style-type: none"> • Agreed. The City continues to advocate for the implantation of its Affordable Housing Review Planning Proposal across all of the council area.
<p>vii. An incentive-based approach to encouraging supply of affordable housing is preferable and will produce a greater number of affordable rental dwellings compared with involuntary contribution mechanisms which add to housing cost and in many cases render development unfeasible. The draft planning statement should be updated to include an incentive-based approach to affordable housing provision within the City, and Goodman requests to be kept informed of any updates to the affordable housing policy.</p> <p>viii. The requirement in the draft planning statement that 100% of any new residential development within the B7 zone be affordable housing removes incentive to provide this housing.</p> <p>ix. Contributions toward infrastructure and Affordable Rental Housing should be levied equally from projects of similar scale, type and location, irrespective of whether they were anticipated in plans or not.</p> <p>x. Landcom supports the City's approach to deliver affordable housing and encourage housing diversity.</p>	<p>vii. Incentive schemes for affordable housing, such as those available under State Environmental Planning Policy (Affordable Housing) 2009 have limited effectiveness and not resulted in any affordable housing outcomes in the City of Sydney, though it has increased the stock of new generation boarding houses and student accommodation. Incentive schemes generally rely on increasing development capacity beyond the existing planning controls, with associated impacts on amenity. The City's existing contribution schemes have resulted in over 650 affordable dwellings for low income households with more in the development pipeline – demonstrating this approach has strong efficacy in the City of Sydney context. The current rates in the scheme have been established following demonstration there is no undue impact on development viability. The City's affordable housing planning proposal considered the feasibility of development and prepared a phase in period to ensure development remains viable.</p>
<p><i>Submissions from community groups and individuals</i></p> <p>xi. The proposed ratios of 3 per cent residential floor area and 1 per cent for commercial floor area are far too low to create an affordable city and, more importantly, an interesting and diverse city.</p> <p>xii. Support for the City's strategies to increase affordable housing.</p> <p>xiii. If social housing tenants with drug, alcohol, mental health or criminal behaviour are going to live next door to working people this needs to be managed properly. There at least needs to be CCTV that is properly administrated.</p>	<p>viii. The City introduced the permissibility of affordable housing in the B7 - Business Park zone in 2015 to allow for some residential development in limited circumstances when it achieved the strategic objective of increasing the stock of affordable housing. The provision is not intended to substantially increase the amount of housing in the B7 zone. District Plan (2018) requires that employment land within the district be retained and managed for employment uses. The City concurs with the state government in its objective to retain employment land in the district and does not support further permissibility of residential uses in this zone.</p>
<p><i>Submissions from state agencies</i></p> <p>xiv. The lack of affordable housing is not only a problem because it undermines the local economy, but also because of the health and social pressures it can bring to bear on the population and its relationship with homelessness.</p> <p>xv. Introducing preferential zoning for affordable rental housing on land zoned B7 – Business Park, where residential development is not otherwise permitted. This</p>	<p>ix. Any planning proposal for unplanned growth, as discussed in the point above, would need to assess the impacts on infrastructure provision to determine appropriate developer contributions. This would include any levies for Affordable Rental Housing. Therefore it is recommended that no changes are made to the draft planning statement.</p>

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<p>does seem a good idea for providing more affordable housing. However, it is important to consider that this is not the only (or overwhelming) path to affordable housing creation, given that it may isolate and concentrate people of lower socio-economic status, and make their area of residence clearly distinguishable from private renters and owners.</p> <p>xvi. Discussion of student housing is required. There is some evidence that overcrowding and homelessness data are significantly impacted by student housing issues.</p> <p>xvii. The CoS does regular street counts of homeless people yet there is no reference to the numbers of people experiencing homelessness in CoS in this section or sections of the document discussing the number of residents of the city.</p>	<ul style="list-style-type: none"> x. Noted. xi. The City agrees that more needs to be done to increase the stock of affordable housing in Sydney. Notwithstanding this, it is important to acknowledge that a range of policy interventions are required by the federal and state government to address the issue. Affordable housing levies are part of, not wholly the solution. The rates in the proposed local government area wide levy scheme are established at a level where they would not have unreasonable impact on the viability of development. Where viability is impacted, market housing cannot be provided, and contributions could not be paid. To understand the economic impacts of the proposed affordable housing contribution the City sought independent economic advice to test identified housing sub-markets. The overarching objective of the economic testing was to appreciate the full impacts of implementing the additional affordable housing requirements, how the impacts vary over different parts of the LGA and how they may be mitigated. xii. Support for the City's strategies to increase affordable housing is noted. xiii. It is critical that a sustainable global city offers a mix of housing and tenure to meet the needs of a diverse population. Providing housing diversity is important to supporting social diversity in the city. Social housing, wherever it is located, needs to be managed appropriately with support services available for tenants. xiv. The City notes that one of the biggest challenges to maintaining and enhancing socio-economic diversity is the increasing unaffordability of housing. While there is no single solution for the increase of affordable housing in the city, there is potential to explore more opportunities in the planning framework and encourage the NSW Government to support affordable rental housing through policy action. Homelessness policy in Australia is generally driven by the federal, state and territory governments, which are jointly responsible for funding and delivering housing, health and homelessness services and other social services around the country. In addition to the City's actions, the draft planning statement and draft Housing for All housing strategy contain actions to advocate to Governments for the increased provision of affordable and social housing. xv. Allowing affordable housing in the B7 zone is only one of many measures the City has implemented to help increase the provision of affordable housing in the council area. These measures are stated in the draft planning statement and draft Housing for All housing strategy.
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	<p>xvi. The Targets section and Priority L3 in the draft planning statement and the draft housing strategy address student housing. Student housing falls under the banner of non-private dwellings and the City has a target to provide 6,000 additional non-private dwellings to 2036, most of which is anticipated to be student housing. It is identified while these developments often absorb more than 30 per cent of lower income renters, and therefore is not considered an 'affordable housing' product, these rentals continue to meet an important need in the inner city and ease pressure on the wider market. The City will continue to advocate to NSW Government for better student housing outcomes that are affordable.</p> <p>xvii. Priority L3 of the draft planning statement addresses homelessness. This has been informed by the evidence based research completed as part of the draft housing strategy, which provide analysis around demographics, housing supply and demand in the council area.</p>
Productivity - general	
<p>i. There is support to prioritise and increase capacity for economic and employment growth in Central Sydney to contribute towards achieving the jobs target. There is also support to deliver diverse spaces to expand business and employment uses in the City Fringe and the Green Square-Mascot strategic centre.</p> <p>ii. It should be made clear that delivering new employment within the Green Square-Mascot Strategic Centre can be delivered in mixed use development, and that residential development is not specifically discouraged within the Green Square-Mascot Strategic Centre outside of the Southern Enterprise Area.</p>	<p>i. The productivity section of the draft planning statement includes actions about supporting growth in Central Sydney so that it continues to serve as Australia's global city. It also contains actions to support the range of nationally important industries and clusters by ensuring spaces meet the needs of those businesses.</p> <p>ii. Residential uses will continue to be accommodated at appropriate locations and quantum in the Green Square urban renewal area, but not in the Southern Enterprise Area given its importance in the city's and District's long term productivity and clear direction from the District Plan.</p>
Central Sydney Planning Strategy and Central Sydney developer contributions	
<p><i>Submissions from community groups</i></p> <p>i. The draft Central Sydney Planning Strategy shows the city south extended to Chippendale including the inclusion of a large proportion of Chippendale, namely Central Park. The inclusion of the Priority prior to the proper exhibition of the draft Central Sydney Planning Strategy shows is premature and should be withdrawn to enable proper consultation with our local community and others.</p> <p><i>Submissions from industry groups</i></p> <p>ii. Support for Councils actions to prioritise and increase capacity for economic and employment growth in Central Sydney to contribute towards achieving the jobs target for the Harbour CBD.</p>	<p>In December 2019, the City and the NSW Government announced an in-principle agreement to progress draft Central Sydney Planning Strategy and planning proposal with changes. Amendments to the planning proposal include:</p> <ul style="list-style-type: none"> • allowing for a new design excellence bonus pathway for up to 50 per cent more floor space and height for development in the four tower cluster areas (near Barangaroo, Circular Quay, Central and Town Hall) that demonstrate design excellence and meet the intent of the draft Strategy Guideline; • encouraging more office, hotel and cultural space in the CBD by removing the residential accommodation bonus instead of implementing a flat 50 per cent cap on residential and serviced apartment accommodation; and • preparing a new development contributions plan to help fund the delivery of new public infrastructure to

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<p>iii. Council should retain some flexibility to allow the option of some new housing in certain precincts in the CBD that are less suitable for greater employment intensification.</p> <p>iv. The following six key principles are raised as part of the finalisation of the draft Central Sydney Planning Strategy:</p> <ul style="list-style-type: none"> • future planning controls should be sufficiently flexible and capable of being adaptable where strategically justified. For example, the proposed 50% cap on residential floor space may not achieve genuine mixed-use outcomes for Central Sydney; • future planning controls should be designed to reduce cost and complexity. For example, planning proposals are an inefficient and onerous mechanism to unlock “strategic floor space” in that it introduces an additional layer of uncertainty of outcome; • building height controls should be re-defined to align with the height terrain mapping undertaken as part of the draft Central Sydney Strategy; • cumulative development levies have the potential to unreasonably burden or restrain growth with Central Sydney and there has not been sufficient modelling undertaken to determine the impacts of such a contribution requirement; • the Heritage Floor Space System requires a significant overhaul such that it is not the subject of increasing costs as a result of scarce supply; and • governance over decision making which will gain significant importance particularly if the City seeks to take over NSW Government controlled precincts. <p>v. The City should ensure its analysis of commercial building occupant utilisation rates are robust [in the capacity study] and should consider targets for beyond 2036.</p> <p>vi. The City should develop alternate plans as its job and housing targets rely on the Central Sydney Planning Strategy which has not received gateway approval.</p> <p>vii. Cumulative development levies have the potential to unreasonably burden or restrain growth with Central Sydney acting against the intent of the draft planning statement. Accordingly, we are concerned that there may be insufficient modelling undertaken by the City to determine the impacts of such a contribution requirement. This concern is compounded as we can see no signs of streamlining or revising the HFS system which is increasing in cost year by year. Currently, levies do not take into consideration the cyclical nature of the commercial market.</p> <p>viii. Council should include a Savings and Transitional Provision in their new LEP, should the 50/50 cap be pursued, which saves approved or lodged Stage 1 Concept DAs from the effect of any new controls. This allows the development industry certainty on their multimillion-dollar investments</p>	<p>ensure the city retains its valued public and green spaces in lieu of the proposed community infrastructure contribution in the draft Guideline.</p> <p>The Department will issue an expedited Gateway Determination to allow the draft Strategy and planning proposal to go on public exhibition in early 2020.</p> <p>The City is preparing a new Development Contributions Plan for Central Sydney in accordance with section 7.12 of the <i>Environmental Planning & Assessment Act 1979</i>. The Plan will help fund the delivery of new public infrastructure, including open space, public domain improvements, community facilities and roads, traffic and transport facilities. The Plan will be publicly exhibited with the draft Central Sydney Planning Strategy and planning proposal.</p> <p>The exhibition of the planning proposal will enable the issues to be considered.</p>
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<p>where a Stage 1 Concept DA has already been lodged or approved.</p> <p>ix. The draft CSPS could be relaxed slightly to allow sites that are currently subject to a residential consent to achieve uplift, provided all uplift is attributed to employment uses. This would allow these sites to contribute to City's actions around strengthening Central Sydney's economic role.</p> <p>x. The City should incentivise renewal of existing, undesirable urban outcomes caused by preservation of existing buildings, by removing any disincentives to the renewal of these sites. This should be implemented by allowing for existing floor space to be preserved as part of any planning proposal or redevelopment.</p> <p>xi. The language in the draft planning statement needs to be clear in its statements about not only prioritising employment floor space in the Sydney CBD, but also prioritising the continued growth of commercial space, and the creation of significantly increased capacity.</p> <p>xii. Council should establish a high rise precinct along Kent St and western corridor using bulk and scale control to develop on merit based envelope with no FSR Control.</p> <p>xiii. Council should provide provisions for no maximum FSR control in CBD and Harbour Village which would reinforce the current established high rise character and support the future growth in the resident population and workforce.</p> <p>xiv. Strongly supports the broad strategy in the Draft CSPS. Permitting heights and densities above established maximum limits will increase growth opportunities for employment floor space, promote the efficient use of land, and encourage innovative design.</p> <p>xv. The 50% cap on residential use should be reviewed by Council. The CSPS is too prescriptive and won't respond to market conditions. If Council does not wish to revise the proposed approach, it is recommended that the 50% cap should only apply to the commercial core of the CBD, and not the fringe areas given their different role and land use functions.</p> <p>xvi. Planning proposals are an inefficient and uncertain planning mechanism for unlocking additional floor space. The draft CSPS focus on proponents submitting planning proposals should be revisited with a view to introducing a clear framework in the LEP.</p> <p>xvii. Building height controls to be amended to align with the building height terrain mapping.</p> <p>xviii. The cumulative impact of development contributions and levies, particularly in relation to Central Sydney Planning Proposals, may negatively impact the feasibility of</p>	
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<p>development and prevent the delivery of employment floor space. The City should review the contribution methodologies proposed and seek detailed industry feedback on the impact on feasibilities as part of the formal Draft CSPS exhibition.</p> <p>xix. The City should explore options for delivery of public benefits through works-in-kind.</p> <p>xx. The requirement that commercial office development maintain full SEPP 65 and ADG solar access requirements to existing central Sydney residential developments stifles Central Sydney's economic role as a global metropolitan centre. Planning controls should be interpreted in a balanced way, to ensure factors such as viability and market acceptance are part of any envelope consideration.</p> <p>xxi. The University of Technology (UTS) notes the following points in relation to the CSPS and the draft Guideline for Site Specific Planning Proposals in Central Sydney (the Guideline):</p> <ul style="list-style-type: none"> • a broader range of uses that need to be supported to allow knowledge-based clusters to grow – particularly where the Innovation Corridor and Camperdown-Ultimo Health and Education Precinct overlap with Central Sydney • the Guideline only supports uplift for non-residential uses. However, some residential uses, such as student accommodation, are required to support the ongoing growth of the university and its student population. • the cumulative impact of contributions on the future growth of UTS should be considered in any future planning framework. • the planning process that is set out in the Guideline is better suited to pure developers that can fully fund and lead a planning proposal process. 	
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Productivity – retail

<p>i. The draft planning statement is silent on the future role of O'Riordan St as a retail/ large format retailing corridor within the City of Sydney LGA. Further clarification is sought that Council is committed to the further development of the O'Riordan St retailing corridor.</p> <p>ii. There is not enough focus on the growth of the retail sector through to 2036.</p> <p>iii. The City should specifically identify retail targets within the overall commercial floor space provision and assess retail provision on a demand rather than a supply basis.</p> <p>iv. The City should recognise the retail hierarchy in the draft planning statement and develop strategies to support the role and growth of centres, including the potential for intensification of use in these locations by permitting the</p>	<p>i. O'Riordan Street is located within the Southern Enterprise Area. The City acknowledges that this area is vital to the long term productivity of the city and District and needs to be protected and managed accordingly. The Southern Enterprise Area Review (the review of the City's Employment Lands Strategy) will consider the future role of industrial and urban services in the Southern Enterprise Area. The City will continue its approach in planning for retail and large-scale retail development in planned centres to ensure that residents, visitors and workers have access to goods and services across the city. The productivity section of the draft planning statement has been amended to include wording to this effect.</p> <p>ii. While the draft planning statement contains numerous references to retail, particularly in the context of its role</p>
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<p>co-location of complementary uses (health, education, creative industries) to create additional employment floor space.</p> <ul style="list-style-type: none"> v. The LSPS does not distinguish large format retail from general retail or adequately consider the need to support areas for growth for large format retail. vi. The priorities for the previous industrial areas (southern enterprise area) in South Sydney are conflicted and do not adequately allow provision for specialised retail premises, including large format retail. vii. The inclusion of 'Specialised Retail Premises' use should be permissible in other land use zones. In addition, where 'Specialised Retail Premises' are permissible, consideration of shops and business premises capped to a maximum gross floor area should be permissible to support the viability of 'Specialised Retail Premises'. viii. Council should undertake a review of existing land use tables to increase flexibility and allow for a greater range of uses in both mixed-use and industrial zones. ix. Applying a restrictive, blanket cap on supermarket sizes is not supported. x. The LSPS should allow for distributed retail floor space, through the provision of appropriate zoning or the facilitation of planning proposals, where necessary. xi. The location of retail in relation to key transport corridors should be carefully considered in the planning of any new retail centres. Coordination between councils and the State, in particular Transport for NSW, is needed to ensure that road networks can adequately service new and existing centres. 	<p>in various centres, it is acknowledged it does not include a focused discussion about the City's approach to retail. More information has been included in the draft planning statement about retail in the city.</p> <ul style="list-style-type: none"> iii. While the importance of retail is recognised, the draft planning statement does not identify targets for any sector within the overall commercial floor space provision. Notwithstanding this, areas of interest to the City that have been identified for further investigation, for example the Botany Road Corridor study area and the North Alexandria area will be subject to a range of studies which will explore the nature of floor space demand (including retail) in those areas. iv. The current planning controls recognise the retail hierarchy by supporting a range of business, enterprise and retail uses in strategic and local centres. The productivity and liveability planning priorities focus on ensuring a genuine mix of uses to encourage employment growth and cater to the needs of workers, visitors and residents. The draft planning statement also identifies areas for further investigation where intensification of health, education and industries are appropriate, including areas within the Innovation Corridor and the Camperdown-Ultimo Health and Education Precinct. v. While the draft planning statement contains numerous references to retail, particularly in the context of centres, it is acknowledged it does not include a focused discussion about the City's approach to retail or large format retail. More information has been included in the draft planning statement about retail in the city. vi. The preparation of the Enterprise Area Strategy to update and replace to Employment Lands Strategy 2014-2019 will focus on protecting and managing industrial and urban services land in the southern part of the city. The review will also consider retail, including large format retail (specialised retail premises), commercial and other business uses at appropriate locations that support the Central Business District, international trade gateways and overall productivity of the Greater Sydney Region. Required changes to permissible uses will be considered in accordance with the findings and recommendations of the review. vii. As stated above in response vi., required changes to permissible uses will be considered in accordance with the findings and recommendations of the Enterprise Area review, which will inform the preparation of the City's Enterprise Area Strategy. viii. The City's planning controls generally provide a high level of flexibility for a range of uses. The City will continue to focus on ensuring a genuine mix of uses across its mixed
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	<p>use zones to achieve both liveability and productivity outcomes. In industrial areas to the south, a key priority in Priority P3 is to ensure that planning controls continue to protect and manage industrial and urban services land, in accordance with the principles for managing industrial and urban services land in the District Plan. This involves ensuring that all existing industrial and urban services land are safeguarded from competing pressure while supporting evolving commercial and other business uses at appropriate locations (i.e. in B7 zoned land in North Alexandria). This will ensure that industrial and urban services in the city's south continue to support the Central Business District, international trade gateways and overall productivity of the Greater Sydney Region.</p> <ul style="list-style-type: none"> ix. As above, the City's 1000sqm retail cap that applies in areas to the south of the LGA has a clear strategic intent. The LSPS does not include an action to review the cap. x. The draft planning statement and current zoning across the city supports opportunities for a diverse range of uses, including retail. The City will continue to focus on ensuring a genuine mix of uses, including diverse retail options are delivered under the existing planning controls. The City will also continue its approach in planning for large-scale retail in suitable locations to ensure that residents, visitors and workers have access to goods and services. xi. The City agrees that accessibility is a key issue when planning for retail uses. Recognising the highly constrained nature of the City's road network, retail is generally encouraged in those locations where there is suitable public transport access.
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City Fringe

<ul style="list-style-type: none"> i. The draft planning statement prioritises economic and employment growth for strategic centres, with maps showing the whole of Chippendale included in the City Fringe with investment and innovation key objectives. This suggests land use changes may follow, which could include residential areas in Chippendale in addition to those zoned B4 mixed use. Further reference is made to the Greater Sydney Commission's Place Strategy for a vision to attract high-growth sectors. This is not well understood or has undergone community consultation, prompting concerns. ii. Investigating opportunities to unlock capacity for enterprise floor space in the City Fringe is supported, including increases to capacity for commercial and other enterprise uses in mixed use areas. iii. The key move to create an innovation corridor within the city fringe and acknowledges that the Innovation Corridor 	<ul style="list-style-type: none"> i. Prioritising employment uses in the wider Harbour CBD is consistent with the District Plan's strategic directions. The City sees residential uses continuing in the City Fringe area as part of the overall mix. There are no plans to rezone the residential areas of Chippendale and no strategic reviews or studies are proposed for the B4 mixed use zones of Chippendale. ii. Noted. iii. Noted. iv. The draft planning statement conveys the City's intent to strike a genuine balance to ensure the long-term economic and employment growth within the City Fringe and to maintain its unique role, contribution and offering for businesses and clusters existing or intending to locate within the area. Further residential intensification is not
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<p>is vital to the City's and District's ongoing economic success and global competitiveness.</p> <ul style="list-style-type: none"> iv. The City should not limit true mixed use precincts in the Innovation Corridor. v. The draft planning statement should recognise that the city fringe is ideally placed to support population growth given its proximity to employment-opportunities in Central Sydney, public transport, infrastructure, services, and centres. vi. The plan should acknowledge the new fish markets location. vii. The Camperdown-Ultimo Collaboration Area is not included in the first map - understandably as it is a map from the Eastern District which pre-dated the creation of the Collaboration Area. We suggest this map be updated. 	<p>intended as part of the productivity priority to unlock capacity and supporting diverse business clusters in City Fringe. L3 provides guidance (i.e. 'principles for growth') on how appropriate residential development at the right locations can continue to complement the city's economic growth and without compromising opportunities for strategically important business, commercial and enterprise uses.</p> <ul style="list-style-type: none"> v. Prioritising employment uses in the wider Harbour CBD is consistent with the District Plan's strategic directions. The City sees residential uses continuing in the City Fringe area as part of the overall mix. The productivity section conveys the City's intent to strike a genuine balance to ensure the long-term economic and employment growth within the City Fringe and to maintain its unique role, contribution and offering for businesses and clusters existing or intending to locate within the area. vi. The fish markets is located within the Bays Market District which is identified on a map in the Governance section of the statement, however the map is not intended to identify specific sites. vii. The Camperdown-Ultimo Health and Education precinct is mapped multiple times in the section (see Figures 58 and 63). For readability and consistency, the City does not intend to alter the GSC's map from the District Plan.
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Innovation corridor

<ul style="list-style-type: none"> i. Broadway Sydney is an anomaly within the Glebe Point Road Village, as defined by the draft planning statement. Accordingly, Broadway Sydney requires further consideration under the draft planning statement, ideally through the designation of an Investigation Area. ii. The role of Broadway in supporting the Innovation Corridor and the Camperdown-Ultimo Health and Education Precinct should be acknowledged, as should its role in supporting the Glebe Point Road Village. iii. Supports the City's recognition of the Innovation Corridor as distinct from the Sydney CBD core. iv. Development controls for the Innovation Corridor, Eastern Creative Precinct and Camperdown-Ultimo Health and Education Precinct should be flexible to permit a variety of development types, including residential. v. Due to the location of the Broadway, Chippendale site at the fringe of the knowledge base/commercial business precinct, UND would like to explore in consultation with CoS if an opportunity may be possible to partner with a commercial / knowledge-based business given its proximity on the fringe of the knowledge base area. A 	<ul style="list-style-type: none"> i. The City will continue to work with Mirvac to investigate renewal opportunities for Broadway Shopping Centre through a planning proposal process. The draft planning statement does not identify specific sites where planning controls may be reviewed, rather its focus is on identifying precincts of interest. The shopping centre is in the vicinity of the Innovation Corridor (not within) and within the City Fringe precinct. ii. It is acknowledged that Broadway Shopping Centre provides an important retail function in the area. However, the strategic intent of the planning priority relating to the Innovation Corridor is to prioritise and safeguarded space for specialised and knowledge-based clusters and businesses, including, health, education, creative industries, professional services and information media. Explicit reference to Broadway Shopping Centre in this context is not supported. iii. Noted. iv. The current planning controls facilitate a range of uses. The Planning Statement does not propose any change to the current B4 - mixed use zoning.
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<p>review into enabling planning controls to provide this opportunity by CoS should be considered. The CoS are encouraged to implement some of the learnings and actions of the State Government's NSW Innovation Precincts relating to the growth when developing planning controls for the Innovation Corridor.</p> <p>vi. UTS strongly supports the concept of the Innovation Corridor and the Camperdown-Ultimo Health and Education Precinct.</p> <ul style="list-style-type: none"> • UTS proposes that a new precinct be created within the Innovation Corridor, acknowledging the need for a discrete planning framework to support the specific cluster of educational uses (and uses complementary to educational uses) in the area. • It is proposed that Council, UTS and other relevant stakeholders work collaboratively to develop a land use framework and an approach to uplift within the precinct that would facilitate the full range of land uses to support knowledge-based clusters. <p>vii. Due to the location of the Broadway, Chippendale site at the fringe of the knowledge base/commercial business precinct, the University of Notre Dame would like to explore in consultation with the City, planning controls that would allow greater partnerships with commercial / knowledge-based businesses given its proximity on the fringe of the knowledge base area.</p> <p>viii. Further actions should be taken to highlight the importance of the Australian Technology Park within the draft planning statement, by setting a framework to enable the highest and best land uses within the site and one which contribute to a vibrant and diverse precinct. The City should also recognise that flexible planning controls are required within business and technology clusters (such as the Australian Technology Park) to allow for complementary land uses to be established that support the workforce economy and encourage people to 'work, stay and play.'</p>	<p>v. Noted. The University of Notre Dame is within the Innovation Corridor and Camperdown-Ultimo Health and Education Precinct. The City's approach in supporting the growth of knowledge-based business opportunities is consistent with the District Plan's directions relating to the Innovation Corridor and NSW Government's Camperdown-Ultimo Place Strategy.</p> <p>vi. Ultimo is identified as a node in the Camperdown-Ultimo Health and Education Precinct. A key focus for this area is to continue to support knowledge-based uses anchored on education, research and technology based institutions and companies in the area. The City's future planning for the area will include close collaboration with universities in the area and other relevant stakeholders such as the Camperdown-Ultimo collaboration area working group. Ultimo is also included within the NSW Government review of the Pyrmont Peninsula.</p> <p>vii. The University of Notre Dame is within the Innovation Corridor and Camperdown-Ultimo Health and Education Precinct. The City's approach in supporting the growth of knowledge-based business opportunities is consistent with the District Plan's directions relating to the Innovation Corridor and NSW Government's Camperdown-Ultimo Place Strategy.</p> <p>viii. The City recognises the importance of the Australian Technology Park but currently has no direct control over the strategic planning outcomes of the area. Achieving strategic outcomes on NSW Government sites in Redfern-Waterloo is largely dependent on successful collaboration between the City and the NSW Government. A transition from State-based legislation to the City of Sydney's planning controls would present an opportunity for the City to have greater control of planning outcomes for these areas. This will enable the City to focus on delivering a range of spaces that cater to the needs of innovative businesses and clusters in the Innovation Corridor. In particular, the City will continue to prioritise desirable non-residential uses, including a range of commercial, enterprise, community and recreational uses.</p> <p>Action P2.5 in the draft planning statement recognises the importance of ensuring a genuine mix of uses to support lively and thriving places in the City Fringe, which includes the Australian Technology Park. This may include a range of complementary residential typologies provided they do not compromise opportunities for commercial or enterprise growth.</p>
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Botany road corridor

<p>i. Submissions requested that a wide range of residential typologies be permitted in the Botany Road Corridor, which would benefit the Australian Technology Park and other key business and technology precincts by ensuring</p>	<p>i. Action P2.5 recognises the importance of ensuring a genuine mix of uses to support lively and thriving places in the City Fringe. This may include a range of complementary residential typologies provided they do</p>
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<p>employees and visitors can work, stay and play in the one area.</p>	<p>not compromise opportunities for commercial or enterprise growth.</p>
Southern Enterprise Area	
<p>i. The City's Employment Lands Strategy 2014-2019 is due for review. Within the draft planning statement there is no confirmation for the indicative timing and purpose of the review.</p> <p>ii. Council should advocate and plan for the southern enterprise area to become a mixed use precinct. The area has potential to support some residential uses.</p> <p>iii. A generic ban on any conversion of industrial land to higher-order uses is inappropriate. We recommend that Council adopts a site-by-site approach to rezoning of industrial land to encourage mixed-use development.</p> <p>iv. Support of the proposal to investigate appropriate land use and built form controls in the B7 Business Park zone to assist in facilitating further non-residential density in North Alexandria.</p> <p>v. The Southern Enterprise Area, with its strategic value and locational efficiency close to the gateways of Sydney – Port Botany and Kingsford-Smith Airport – should continue to play a crucial role in supporting the growth of the local, metropolitan, state and national economies while facilitating regional and global network connections.</p> <p>vi. Current planning controls for industrial lands must be reconsidered to optimise and enhance the evolving use, function and output of existing general industrial zoned land where contextually appropriate by encouraging innovative built form, design and density.</p> <p>vii. Council should consider flexibility in height restrictions for industrial zones to cater for high bay and multi-level warehouse opportunities which could become economically viable in the Southern Enterprise Area.</p> <p>viii. It is recommended that the precinct-based review of the planning controls for North Alexandria be extended to the southern portion of Alexandria to investigate opportunities for additional density within the B6 zone to support the growing demand for large format retail and other industrial uses such as data storage and pathology centres which are increasingly</p>	<p>i. The Enterprise Area Review 2019 will inform the preparation of the City of Sydney Enterprise Area Strategy 2020 to update and replace the current City of Sydney Employment Lands Strategy. This review will focus on ensuring that the Southern Enterprise Area continues to accommodate industrial and urban services clusters, consistent with the District Plan's directions. The review will also investigate ways to support the evolving economic and employment activities in North Alexandria to ensure the City's long-term productivity. The new Strategy will guide future planning decisions, including the preparation of precinct plans and built form controls for the North Alexandria Precinct. Consultation with land owners and key stakeholders will form part of this strategic land use review, to understand the aspirations and needs of evolving businesses, industrial and urban services uses in the area. Feedback from landowners will also help inform the preparation of precinct plans. The City aims to commence the review within the 1st quarter of 2020.</p> <p>ii. The City supports the District Plan's strategic direction to protect and maintain industrial and urban services land in the Southern Enterprise Area. Residential uses will continue to be provided for at appropriate locations and quantum in the Green Square urban renewal area, but not in the Southern Enterprise Area given its importance for the city's and District's long term productivity and clear direction from the District Plan. In particular, the City will ensure that the Southern Enterprise Area is protected from residential encroachment through the review of the permissibility of 'shop top housing'.</p> <p>iii. As above.</p> <p>iv. Noted.</p> <p>v. Noted.</p> <p>vi. The efficiency of the current planning controls will be considered in the upcoming review of the southern employment lands.</p> <p>vii. The Enterprise Area Review 2019 will ensure that appropriate spaces in the Southern Enterprise Area accommodate industrial and urban services uses. This will help ensure the long-term viability of the Southern Enterprise Area. This submission will be considered in the context of this review.</p>

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	<p>viii. The City will investigate supporting evolving business opportunities in the B7 zoned land in North Alexandria to support the changing needs within the wider Green-Square Mascot Strategic Centre. However, a key focus for the Southern Enterprise Area, including the B6 zoned land, is to continue to accommodate industrial and urban services uses. This recognises its important role in the city's and District's long term productivity and is consistent with the clear direction from the District Plan.</p>
Sustainability – general	
<i>Submissions from industry</i>	<p>i. Council should investigate how local planning controls can incentivise better buildings that reduce emissions, minimise waste and use water efficiently.</p> <p>ii. Support the recommendation for dual plumbing where applicable. Dual plumbing should be encouraged for projects in areas with existing recycled water networks.</p> <p>iii. Landcom supports the City in its continued leadership in delivery of a sustainable and resilient City.</p>
<i>Submissions from individuals</i>	<p>iv. Belvoir's buildings are old and severely in need of upgrades. We'd like to install solar panels on our roof and batteries to store the power, given the high usage of electricity in our performances. Water recycling is another area we'd welcome assistance with.</p>
<i>Submissions from peak bodies</i>	<p>v. Cancer Council NSW and the Cancer Institute NSW would like to commend City for the commitment to increasing tree canopy cover and vegetation across public and private plan as a local planning priority in the draft planning statement and have provided additional text which supports shade as a planning priority for the council area.</p> <p>vi. The Property Council is supportive of measures to improve the sustainability of buildings provided they do not jeopardise project feasibility.</p>
<i>Submissions from state agencies</i>	<p>vii. The Sydney Local Health District congratulates the City for their planned work on mitigating climate change and supports Council's aims to naturalise waterways, increase water sensitive urban designs, and increase vegetation where possible including green roofs and walls, rain gardens, swales and urban wetlands. It recommends:</p>

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<ul style="list-style-type: none"> actions/strategies be included to specifically address how to increase resilience of people residing/working within the City, with particular emphasis on fostering resilience for the more vulnerable population groups such as the homeless, the elderly, children, pregnant women, those with chronic diseases, and those of lower socio-economic status. amending the following: "...safe level (such as ultra-fine particulates)..." to "...safe level (such as fine particulate matter)..." Fine particulate matter has well established scientific evidence of causing adverse health impacts, with no safe level of exposure. There is currently much less evidence regarding ultrafine particles. <p>viii. The Environmental Protection Authority recommends the following:</p> <ul style="list-style-type: none"> the action to improve the health of waterways would benefit from expansion to include both point source and diffuse source from sites that contribute to water pollution the benefits and opportunities from adopting a circular economy approach across sectors should be realised where possible The draft planning statement could set directions for enhanced planning controls in areas with potential for pre-existing contamination. <p>ix. Sydney Water supports the City in its proposed sustainability outcomes and would also welcome further opportunities to collaborate with the City on those actions related to water efficiency and reuse.</p>	<p>community resilience by planning for high quality public open spaces and shared or communal indoor and outdoor spaces to encourage social connectedness. By improving the accessibility of public domain for people of all ages and abilities – with a focus on children and young people, older people, and people with a disability, we are improving our community's quality of life.</p> <ul style="list-style-type: none"> The draft planning statement has been amended in line with suggested wording. <p>viii. The following is noted:</p> <ul style="list-style-type: none"> point source pollution is typically related to ongoing activities, such as a pipe of drain flowing from an industrial activity, rather than undertaking development. The planning system regulates development rather than ongoing polluting activities, which are addressed through the Protection of the Environment Operations Act 1997. The EPA should provide further guidance for councils as to how it could be dealt with in the planning system including how it could be regulated. the draft planning statement has been amended to include an action at Priority S3 to investigate the development of a contamination policy to manage risk associated with new development. <p>ix. Noted. The City welcomes further opportunities to collaborate with Sydney Water on water efficiency and reuse.</p>
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Net zero pathways	
<p><i>Submissions from industry</i></p> <p>i. The city has set the target of net zero emissions from the local government area by 2050 on the behalf of all building owners. The City advocates for increasing the BASIX energy requirements which may be difficult for owners and developers to achieve without sufficient incentive such as additional height or floor space. AMP Capital is concerned that there is a lack of detailed analysis with respect to the mechanisms that might be included to achieve such a target and recommends that council provide further clarification on the implications to the development industry of achieving net zero buildings.</p> <p>ii. Commend the City on their ongoing focus on environmental performance within the built environment.</p> <p>iii. Council is to be applauded for their intentions to "ensure that that Sydney's developers have a clear pathway to net zero energy with the required actions known up-front". To ensure that sustainability targets are achieved, it is</p>	<p>i. The City wants to ensure that Sydney's developers have a clear pathway to net zero energy with the required actions known up-front. Identifying step changes with advanced notice of their implementation will encourage innovation from the development industry. The City will provide the development industry with the detailed analysis of any changes the City proposes to the BASIX SEPP or mechanisms to help achieve the net zero target. No amendment required.</p> <p>ii. Noted.</p> <p>iii. The City is aware that developers need a phase-in period to adapt to any new changes in building performance standards to ensure sustainability targets are achieved. It is the intention of the performance standard pathways to net zero energy buildings project to provide advance notice of any step changes.</p> <p>iv. The developing performance standard pathways to net zero energy buildings section in the draft planning</p>

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<p>important to provide developers a phase-in period to adapt to any new changes in building performance standards.</p> <p>iv. The draft planning statement fails to explain how the net zero energy initiative will be implemented, what development incentives will be made available and how it will consider implications for the development industry in terms of burdens, costs, and incentives.</p> <p>v. The location of the renewable generation assets needs to be considered on a whole of community basis – locations with the best access to solar and wind may not reside in the wider LGA area but still provide strong environmental, social and economic outcomes.</p> <p>vi. Support for the position of delivering energy efficient buildings operating on 100% sustainable energy and that renewable procurement to be integrated into the business' energy procurement practices, rather than taking an individual building procurement approach.</p>	<p>statement can't provide details on implementation of this project at this stage, as the findings are not finalised. The City's net zero emissions target was established prior to the draft planning statement, which reiterates it. The developing performance standard pathways to net zero energy buildings section in the draft planning statement explains that the project includes developing an evidence base, including a cost benefit analysis. Feedback from the industry will be sought on the pathways proposed and the supporting evidence base. The City is aware of the challenges that exist to high rise buildings achieving net zero energy on site due to small roof spaces, shading etc., which limits the implementation of renewable energy generation. The project will investigate how offsite renewable energy generation or renewable energy offsets can be factored into the NSW planning system. Incentives are also being investigated as part of that project.</p> <p>v. Noted. The City is aware of the challenges that exist for high rise buildings achieving net zero energy onsite due to small roof spaces, shading etc., which limits the implementation of renewable energy generation. The City is investigating how offsite renewable energy generation or renewable energy offsets can be factored into the NSW planning system.</p> <p>vi. Noted.</p>
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Governance - implementation

<p>i. The \$50 million Capital Investment Value trigger for development being transferred to the Central Sydney Planning Committee should be higher as this is no longer reflective of what would be considered a significant development application within Central Sydney.</p>	<p>i. Any modification to the existing thresholds for the Central Sydney Planning Committee would require amendments to the City of Sydney Act 1988, and subsequent updates to the Local Planning Panel arrangements.</p>
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Governance – consultation and collaboration

<p>i. The inclusion of community as a key stakeholder should be a primary objective so that a shared vision can be achieved. This objective should be added to the governance and implementation section of the draft planning statement.</p> <p>ii. While a Community Participation Plan proposes to 'involve the community in planning processes and decisions' and follows changes to the EP&A Act, in practice the current process is insufficient. An additional priority should be added aimed at encouraging the City to be best practice leaders, namely 'the city make best practice community engagement a priority'.</p> <p>iii. Action G1.1 (a) is proposed to be changed to read: we will endeavour to ensure best practice community engagement with (b) to read: establish transparent and</p>	<p>i. Priority G1 has the following objectives that ensure the community is included as a key stakeholder:</p> <ul style="list-style-type: none"> • 'The community is informed about and participates in planning, understands decisions and has confidence in planning processes' • 'The City of Sydney partners and collaborates with others to achieve the vision and planning priorities for the city'. <p>ii. The City provides regular opportunities for the community to participate in the decisions and projects that shape the city's built environment, economy, culture and society. The community is consulted at key points in strategic planning projects and development application processes. The Community Participation Plan sets out how the City will engage with the community when</p>
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<p>encourage best practice consultation and (c) make transparency in decision making an important priority.</p> <ul style="list-style-type: none"> iv. Further changes to G.1.2 are suggested, i.e. ‘collaboration with the community and others on a range of planning matters including’. v. Monitoring and reporting key indicators is proposed. This includes infrastructure, liveability, productivity and sustainability, as important elements. While social wellbeing is monitored as part of infrastructure, the inclusion of equity and wellbeing with performance indicators for liveability is suggested. vi. In the case of residential communities in Chippendale, include indicators that monitor the retention and sustainability of existing low rise residential communities in mixed use zones. vii. Consultation should be undertaken with individual property owners affected by changes proposed to their property in the draft planning statement. viii. Planning proposals and development applications should be assessed under the controls that were applicable at the time the application was lodged. 	<p>planning. The City will continue to ensure best-practice mechanisms are employed involving the community in planning the city.</p> <ul style="list-style-type: none"> iii. The Community Participation Plan is a procedural document that has been prepared to meet the requirements of the EP&A Act and the Local Government Act 1993. The City will continue to ensure transparency and best-practice mechanisms are employed when involving the community in planning the city through the City's Community Engagement Strategy. iv. Action G1.1 covers consulting the community on a range of planning matters and therefore does not need to be repeated in Action G1.2. v. The draft planning statement is a land use based document, which focuses on land use planning. The impacts of planning on social wellbeing is considered throughout the draft planning statement. However the indicators to specifically monitor social wellbeing are covered in the City's A City for All Strategy, which aims to achieve socially just and resilient Sydney. vi. The indicators relating to housing will be reported annually through the City's Housing Audit and Residential Monitor. vii. The draft planning statement in itself makes no changes to the City's current planning controls. The upcoming review of the City's LEP/DCP, and other key strategic planning projects will incorporate consultation with affected landowners. viii. The draft planning statement in itself makes no change to the City's current planning controls. The upcoming review of the City's LEP/DCP will consider the need for appropriate savings provisions for lodged DAs.
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