



SSROC Submission on:

**THE DRAFT DISTRICT PLANS AND
THE TOWARDS OUR GREATER
SYDNEY 2056**

Submitted to the Greater Sydney Commission

31 March 2017

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A. KEY INITIATIVES IN THE PLANS SUPPORTED BY SSROC MEMBER COUNCILS

The Southern Sydney Regional Organisation of Councils Inc. (SSROC) is made up of 11 councils covering the South District and the Central District except Strathfield. SSROC appreciates that the Greater Sydney Commission (GSC) has called for comments on the draft District Plans and on “Towards our Greater Sydney 2056”, a draft amendment to update *A Plan for Growing Sydney*, and welcomes the opportunity to provide feedback.

SSROC broadly supports the following initiatives, proposals or concepts in the draft District Plans or the “Towards our Greater Sydney 2056” metropolitan plan highlighted below, subject to the issues raised in the subsequent sections.

Three Cities metropolis

The Commission’s vision of transforming Greater Sydney into flourishing three cities metropolis: the Eastern City (Sydney City), Central City (Greater Parramatta) and Western City (Western Sydney Airport and surrounding local council areas) is largely supported.

Three hierarchical centres

The vision of Sydney to 2056 that includes three hierarchical centres: strategic centres, district centres and local centres. (However, SSROC has concerns with the categorisation of some centres under the GSC’s definitions, specified in sections 9.2 and 15 below.)

Alignment of land use planning and transport

Aligning land use decisions, infrastructure planning and transport planning, together with promotion of collaboration of local government, State agencies and stakeholders through the district planning process.

Review of Metropolitan Plan

- The District Plans to inform the 2017 review of Greater Sydney’s metropolitan plan and the finalising of the revised version, *Towards our Greater Sydney 2056*.
- The review of *A Plan for Growing Sydney* to take place in parallel with the review of key plans, the NSW Long Term Transport Master Plan 2012 and Rebuilding NSW: State Infrastructure Strategy 2014, which will lead to the rare alignment of land use, transport and infrastructure plans in the Greater Sydney.

Vision of Liveable City

The Commission’s vision for a liveable city is supported. The challenge for the GSC is to see this through. It also requires strong commitment from the NSW Government, which is best positioned to influence and implement decisions on planning, infrastructure and affordable housing.

Affordable Rental Housing Target

SSROC member councils generally welcome the draft District Plan’s proposal of Affordable Rental Housing target of 5% to 10% by the Commission subject to viability, that targets large redevelopment area that would likely gain substantial uplift in value as a result of new infrastructure. See further comments in the sections that follow.

While the draft plans have many commendable initiatives, they raise many issues that need to be addressed as part of finalising the plans. These are identified in the sections that follow.

B. KEY ISSUES FOR BOTH CENTRAL AND SOUTH DISTRICTS

The comments and recommendations below are for both the Central and South District Plans, though the issues are applicable in varying degrees to most parts of the metropolitan Sydney.

1 Collaboration

1.1 Collaborative approach to urban precincts, renewal corridors and major developments

As state-driven metropolitan plans set out growth targets, identify Strategic Centres and District Centres and as the NSW Government maps out Priority Precincts and Urban Renewal Corridors, key stakeholders such as local councils need to be effectively engaged as collaborative partners. This is particularly important in large scale urban renewal and redevelopment sites.

The District Plans should specify a model, approach or framework for Council-State agencies collaboration in major urban development initiatives. The GSC could then develop in consultation with key stakeholders, a framework for such collaboration in major urban renewal and redevelopment projects, particularly in Central and South Districts.

The SSROC Memorandum of Understanding (MOU) on urban intensification and urban renewal offers a good starting point and insight (see Appendix A). The draft District Plans should go a step further to 'institutionalise' effective collaboration strategies and approaches by identifying the roles and responsibilities of State agencies and councils in the collaboration process.

A revised Parramatta Road Urban Renewal collaborative model that incorporates elements of the MOU developed by SSROC would be an effective improvement to the approach often used by NSW Government agencies. SSROC regards this as a mutual pathway to liveable, accessible and productive cities.

Recommendations:

1. The District Plans should 'institutionalise' effective collaboration strategies and approaches by identifying the roles and responsibilities of State agencies and councils in the collaboration process for Urban Renewal Precincts and large Redevelopment Sites.
2. The District Plans should specify a *model, approach or framework for Council-State agencies collaboration in major urban development initiatives.*

1.2 District planning and Local Environmental Plans

The draft District Plan identifies district planning as a middle level planning that connects local planning with metropolitan planning. This is important, though arguably, the draft District Plan needs to contain more specific details. This is particularly important for newly amalgamated councils. These councils will need to prepare new local environmental plans (LEPs) that should be informed by district planning priorities. More district level details are required for local environmental plans to build on and deliver productive, liveable and sustainable outcomes.

Councils are required to, as soon as practicable, after a district plan is made, to review the LEPs for the area. The GSC and Department of Planning and Environment need to provide guidance on the nature of the review and the type of acceptable changes to LEPs that will give effect to the

District Plan. This is necessary because several provisions within LEPs are restricted and all changes are subject to compliance with the content of the Standard Instrument and model local clauses issued by the department. Councils need to be collaboratively engaged in this process.

Recommendations:

3. The revised Central District Plan should include more details such as actions, targets and milestones for key elements, including land use, transport and infrastructure.
4. The District Plans should provide guidance on the nature of the review and the type of acceptable changes to LEPs that will give effect to the District Plan.

1.3 Tiers of Government collaboration in affordable housing solutions

The District Plan needs to identify further actions to ensure all levels of government work together to address all issues that affect housing affordability. This is important because increase in supply only will have limited potential to solve Sydney's affordability problems. This will also be in line with the Australian Government's Smart City Plan.

It will be necessary to identify and to deploy the best coordination mechanism for the three tiers of government on policy and strategy levers that affect affordable and diversity of housing. Options for local council-state and non-government housing provider partnerships will need to be worked through. The National Rental Affordability Scheme has been discontinued and an alternative incentive scheme is necessary. All tiers of government have a role in the process of developing alternative solutions.

Recommendation:

5. The District Plan should flag innovative Council-State and non-government housing providers' partnerships for affordable housing, housing finance models and mechanisms for their implementation.

1.4 Delivery of urban renewal projects

The District Plan is largely silent on the delivery of large renewal projects in the South and Central Districts. For example, the Sydenham to Bankstown Urban Renewal Corridor, Green Square, Waterloo Estate and the Bays Precinct. As these are state significant projects, it is important that the District Plans highlight how these initiatives contribute to the aspirations of the plan.

Recommendation:

6. The Central and South District Plans should identify the major renewal projects and highlight how these initiatives contribute to the key priorities of the plan.

1.5 Implementation of the District Plan at the local level

The implementation of District Plans should consider measures and initiatives employed by councils outside LEPs. For example, councils may amend their DCPs and plans of management or prepare strategies on issues such as carbon emissions and water quality.

On the other hand, the implementation of some key aspects of the District Plan is likely to be more effective if actions are addressed outside the statutory planning framework and local planning controls, for example, council corporate plans. This will require getting the balance right and a collaborative framework developed collectively by the NSW Government agencies and councils.

Recommendation:

7. The GSC should consider inclusion of implementation plan or strategy as part of the District Plans. This should detail priorities, actions, measurable targets, timeframes and possibly indicative sources of finance and other resources.

2 Liveability

2.1 The Concept of Liveability

SSROC welcomes the District Plan's recognition of liveability as a key element. However, the concept of liveability and specific mechanisms to embed it in the District Plans were not followed through. This issue needs to be addressed in the revised District Plans. Cities like Sydney compete for knowledge jobs and investment with international destinations such as London, Singapore and Hong Kong, and liveability is one of the factors for a city's competitiveness.

The concept of liveability that SSROC advocates refers to the well-being of a community. It is the sum of the aspects that add up to the quality of life of a place, including its economy, amenity, environmental sustainability, health and wellbeing, equity, education and learning, and leadership. It is well aligned with the 30-minute city concept.

Urban intensification should result in a measurable improvement in the liveability of the six Sydney districts and the urban renewal precincts and corridors.

SSROC recommends that the principles that guide liveability should be recognised in the District Plans, particularly in the Central and South Districts. For example:

- urban intensification to be linked to social and environmental as well as economic infrastructure capacity for improved amenity,
- performance indicator for affordable housing, education, health, community services, open space and place-making as elements of the capacity of an area to accommodate growth,
- improving walking, cycling and other active transport as key elements of the sustainability, accessibility and liveability improvements expected alongside urban intensification,
- acknowledging the role of green space, active and passive recreational space, biodiversity and amenity trees in human health and wellbeing,
- innovation in energy supply and waste management to reduce community costs and environmental impacts.

Recommendations:

8. The principles that underlie liveability should be recognised in the District Plans, particularly in the Central and South Districts.
9. The District Plans should set targets for schools and education facilities, health services, open space, recreational facilities and environmental sustainability as is the case with housing and employment.

2.2 Benchmarking for Strategic Outcomes

The District Plans should make a provision for the use of city performance dashboard/indicators. SSROC suggests that it will be necessary to explicitly identify universal benchmarks and targets at the local, district and metropolitan levels. This will be in line with the Federal Government's Smart City Plan that opted for city performance indicators.

The Liveability Benchmarks for central and southern Sydney developed by SSROC with the assistance of SGS Economics and Planning, sets out benchmarks for liveability dimensions, adopted by member councils and has been shared with the Greater Sydney Commission.

Further, SSROC's *Liveability Indicators and Mapping* project has developed an interactive geographical information system (GIS) platform to model access to facilities such as open space, shopping centres, health facilities and rail stations.

The mapping tool illustrates accessibility to key social infrastructure across the SSROC area, shows differences in liveability between locations and enables 'pressure testing' of urban growth scenarios, renewal corridors and precincts in Central and South Districts (See Appendix B - *Liveability Indicators and Mapping Report*).

Liveability indicators are important city performance benchmarks and SSROC will welcome the opportunity to share these concepts and to work collaboratively with the GSC on innovation-driven and community-responsive city performance benchmarks.

Recommendation:

10. The District Plans should identify city performance benchmarks for infrastructure and amenities at the local, district and metropolitan levels and for Urban Renewal Precincts, Priority Precincts and large Redevelopment Sites.

2.3 Place-making and communities

Place-making is about designing communities for people. The key focus of the draft District Plans seems to be on housing and job creation, but community is much more than that. It is necessary that people are connected to their local environment through recognition and a focus on the social, cultural and environmental aspects of the local area.

The District Plan should make a reference to the major role that State agencies play in the provision of major facilities and infrastructure. There is need for those agencies to collaborate with councils and to uphold the principles of good urban design and practices.

The process of creating, enhancing and managing people-focused places should be collaborative. Councils, GSC and the Department of Planning and Environment should work together to create

better places, with a focus on the people. This needs to be prioritised in the draft District Plans. Developing a kit to assist local councils would be helpful.

Recommendation:

11. That GSC work collaboratively with the Department of Planning and Environment and councils to develop a place-making tool kit to assist in the engagement of communities to identify local values and aspirations of communities and design and create places that give effect to these.
12. The tool kit could provide benchmarks for techniques and approaches for councils to implement in engaging with local communities and in creating people oriented places.

2.4 Broader targets

The District Plan's effectiveness would be improved if a broader range of targets are identified and systematically linked to implementation and monitoring strategies.

There are broad targets for dwellings, affordable housing and jobs but none for key sectors such as sustainability, open space and infrastructure. The UN Sustainable Development Goals that Australia is signatory to, and the SSROC liveability benchmarks provide frameworks that can be adapted to the metropolitan Sydney context.

Recommendation:

13. Targets should be set for transport and accessibility, environmental or precinct sustainability, access to schools, health and amenities and recreation and open spaces.

2.5 Infrastructure Priority List

When the GSC prepares the annual Infrastructure Priority List, it needs to consider SSROC member councils' concept of benchmarks and indicators of liveability, existing liveability deficits and infrastructure gaps in the Central and South Districts.

Collaborating with SSROC and with member councils would be important. SSROC, assisted by SGS Economics and Planning, has done extensive work in this area after the Central and South Districts identified liveability as a priority for their areas. The Priority List should also take into consideration infrastructure priorities of councils, including those that span multiple districts.

Recommendation:

14. Compilation of Infrastructure Priority List to maximise district planning outcomes should take into consideration SSROC member councils' concept of liveability and associated infrastructure gaps for the Central and South Districts.

3 Affordable Housing

Affordable housing is a major issue in both the Central and the South Districts. SSROC member councils have endorsed a position on Affordable Housing (See “Affordable Housing Submission to the Greater Sydney Commission” – Appendix C). The submission identified housing target, planning mechanisms and policies and solutions to address affordable housing in the area.

SSROC recommends that the key aspects of the recommendations of the Affordable Housing Submission be embedded in the District Plan of the Central and South Districts.

Recommendations:

15. SSROC member councils’ Affordable Housing Target of 5% to 15% of all new dwellings should be embedded in District Plans for Central and South Districts, constituent LGAs, and Priority Urban Renewal Precincts in accordance with benchmarks set out in the SSROC’s Affordable Housing Submission to the GSC.
16. The District Plan should go further to specify that affordable rental accommodation created in accordance with the above targets be dedicated or secured as affordable rental housing in perpetuity, and managed by a Community Housing Provider.
17. District Plan’s affordable housing strategy should target housing diversity, that is a split between single-person and family housing.
18. District Plan should facilitate local government role in affordable housing through a mandatory requirement for affordable housing in their Local Environmental Plans (LEPs), where there is land value uplift to support its application in Priority Urban Renewal Precincts, large redevelopment sites and government land. Rates should be set at reasonable, feasible and equitable levels for a particular area.
19. Subject to the above, councils could be required to adopt, monitor and report against the Affordable Housing Target as part of their annual reporting requirements, and to develop needs based strategies to achieve this.
20. District Plans should support Mandatory Affordable Housing Contributions within Priority Urban Renewal Precincts, large redevelopment sites and government land (State and local) to create affordable rental housing in perpetuity.
21. At least half of all new affordable housing created be affordable rental housing in perpetuity for very low and low income households.
22. The District Plan and the GSC should facilitate the inclusion of all councils within the Central and South Districts under State Environmental Planning Policy No 70 (Affordable Housing).

3.1 Draft Medium Density Housing Code and housing supply

The GSC advocates the Department of Planning and Environment’s Draft Medium Density Housing Code as a mechanism to facilitate housing supply. SSROC member councils have reservations and objections to elements of the Medium Density Design Guide (MDDG). See Appendix D – SSROC Submission on the Draft Medium Density Design Guide.

The MDDG will not largely lead to an increase in housing supply as it also applies to zones where multi-dwelling housing is permissible, and councils already allow medium density development.

The Design Criteria for Complying Development prescribe many controls that are not in alignment with Council DCPs. In many cases, complying development will deliver outcomes that have significantly reduced amenity in comparison to the development's surroundings. Although the District Plan recognises that councils are in the "best position to investigate opportunities for medium density", the proposed new Medium Density Housing Code and the *SEPP (Exempt and Complying Development Codes) 2008* override council's planning considerations.

Councils should be given the opportunity to complete the local housing strategy and if they can demonstrate delivery of medium density housing in the city, they should be exempt from the Draft Medium Density Housing Code.

Recommendation:

23. Councils that demonstrate their ability to efficiently deliver medium density housing should be exempt from the draft MDDG. Such provision for exemption was applied under a previous strategy to stimulate medium density housing in selected areas, the State Environmental Planning Policy No. 53.

3.2 Infrastructure support for Housing Targets

It is also important that councils are involved in the process and approach to determining housing target numbers and infrastructure capacity to support the increase in housing. Many SSROC member councils would be reluctant to support any housing targets for their area if there is no corresponding infrastructure support from the NSW Government.

SSROC member councils emphasise that the requirement for affordable housing must be accompanied by committed funding to upgrade or improve public transport networks related to urban renewal or new release sites.

Recommendation:

24. The District Plan should address the issue of upfront infrastructure to support the targeted level of housing.

4 Funding

4.1 Value Capture

The draft District Plans identified the importance of Value Capture and sharing to the funding of infrastructure in Sydney. This is important to councils as they are expected to attain housing and growth targets, which both have infrastructure and amenity implications.

The District Plan contains only a generic statement that the GSC will continue to work across government for a consistent approach and mechanism for value capture and sharing.

The District Plans need to go further with a specific commitment or proposal for a collaborative mechanism or model for value capture/sharing that councils can apply consistently across the six districts of Sydney, certainly in the Central and South Districts. The plans should seek to set out in clear terms, the approach or methodology for calculating value capture.

Recommendation:

25. The Districts Plans need to be specific with commitment or proposal for a mechanism or model for value capture that can be applied consistently across all the six districts.

4.2 Voluntary Planning Agreements

Voluntary Planning Agreements (VPA) are a key mechanism being used to create affordable housing by some councils in the Central and South Districts. The size of reasonable voluntary contributions can be difficult to determine and to agree. Support by State Government, including guidance on a transparent method of calculation, would enhance local government's capacity and confidence in relation to such agreements. This could result in more equitable affordable housing outcomes.

The District Plan provides an opportunity for the GSC and the NSW Government to provide clearer guidance on the use of VPAs such as methods of calculation and a planning agreement template. This should be developed in consultation with SSROC member councils.

The Department of Planning and Environment's draft guidelines are unclear as to whether VPA can be used for value capture, emphasising that VPA should not be used to capture "windfall gain", while what constitutes "windfall gain" was not defined. This highlights the need for clear, reliable guidance.

Recommendations:

26. The District Plan should give guidance on Voluntary Planning Agreements to local councils, eliminate ambiguity, provide consistence in approach and address any concerns that VPA could threaten the economic viability of development.
27. Value Capture mechanism should enable Councils and the Department to give consent only where the developer has offered to provide, by an agreement, adequate infrastructure and public benefits to make what would otherwise be an unacceptable development in planning terms, to become acceptable.

4.3 Section 94 Contributions

The District Plan targets for housing and employment, the aims of creating liveable and productive city, and the objective of place-making in urban centres all have significant infrastructure funding implications if they are to be achieved. With s94 caps on rates for contributions for infrastructure, the ability of councils to fund infrastructure and services is limited.

The draft District Plan should address (or at least recognise) the increasingly critical issue of capping of councils' rates and maximum percentages applying to levies under s94A of the *Environmental Planning and Assessment Act 1979*. This issue is overdue for review. It would be helpful if the District Plan flagged the urgent need for review as part of the strategies for funding

of local infrastructure and services. Councils will need to be collaboratively engaged in negotiations and options for infrastructure.

Recommendation:

28. The District Plan should provide clarity of infrastructure funding streams for meeting the infrastructure challenge of urban growth.

5 Strategic Centres

At least five previously classified “Strategic Centres” were designated as “District Centres” in the draft Central of South District Plans. These are Bankstown, Bondi Junction, Burwood, Hurstville and Bankstown Airport/Milperra. SSROC would like to urge the GSC to reconsider this decision in relation to the centres.

There is in particular, a strong case to reinstate Bankstown as a strategic centre. According to a SGS Economics and Planning led *Bankstown and Bankstown Airport - Centre Analysis*, Bankstown met two of the five criteria for strategic centre and partially meets another two criteria. The Sydney Metro to Bankstown and the possible locating of a tertiary education institution at Bankstown will enhance the knowledge-intensive and services base of Bankstown. The employment forecast for Bankstown is higher than that of a number of strategic centres, including Kogarah, the only strategic centre in the South District.

Bankstown potentially is in a unique position to be a strategic hub, with links to Liverpool and the Western City, Parramatta and the Central City and the Eastern City, with the possible extension of the Sydney Metro from Bankstown to Liverpool and an increase in connectivity between Bankstown and Parramatta. The centre is located in the biggest local council in the state, contributes substantially to the economy of Sydney and has a huge potential for growth.

Recommendation:

29. That the Greater Sydney Commission consider reinstating previous Strategic Centres that were designated as District Centres in the SSROC area, particularly Bankstown.

6 Sustainability

6.1 Resource Recovery and Waste Management

An increase of tens of thousands of dwellings and people in the Central and South Districts in an unprecedented urban intensification in the coming years will lead to huge increase in waste generation. Additional waste management infrastructure will be inevitably required to meet the challenge. For example, an expected 26% increase in waste generated in the Sydenham to Bankstown Urban Renewal Corridor will mean additional transport and collection costs, as well as additional truck movements with the associated environmental and social impacts. Existing infrastructure is almost at capacity already, with landfills closing and new facilities such as Veolia’s Woodlawn waste processing facility opening in 2017 with 100% utilisation. An adequate network

of waste transfer and treatment facilities must be developed if NSW is to achieve resource recovery targets and maximum diversion from landfill.

SSROC strongly supports alternatives to landfill for disposal, as well as reduction in waste generation rates, but these aims generate the need for alternatives for which Sydney already lacks options. Possibilities for consideration include precinct-level renewable energy infrastructure neighbourhood waste-to-energy facilities, which are already generating controversy, but which might fill a significant infrastructure gap with adequate environmental controls such as those imposed on facilities in European and Japanese cities.

Significant developments will generate major increases in waste generation, but also create opportunities for new technologies to be deployed, such as automated vacuum waste collection systems. With landfilling becoming unacceptable and increasingly scarce, new technologies for disposing of waste are essential. These opportunities need to be identified early before development planning, so that they can be incorporated as part of the new development, and so that they can earn a social licence to operate.

Recommendation:

30. The Central and South District Plans should consider ideas and proven models for waste minimisation, renewable energy and waste recycling options.

6.2 Infrastructure for Sustainability into the Future

SSROC supports the three cities concept as a much more sustainable model that will enable communities to develop and thrive locally, and reduce the need for commuting long distances. Although there will be significant challenges to overcome to achieve this model, it would be very worthwhile, enabling the vision of 30-minute access to jobs and services, and increasing the liveability of communities. However we also have reservations about the potential for other areas of Sydney to be adversely affected if this concept is not well implemented.

It is encouraging to see recognition of the importance of air quality and note that the Commission plans to examine options to improve it. We would suggest that there may also be a need to review the number and locations of air quality monitoring stations, as air quality can be a localised issue.

The District Plans should have measures to ensure that development in urban renewal areas and on major developments schemes are required to promote sustainable utility infrastructure provisions. Examples include dual reticulation systems for recycled water and easements in the building to enable on-site energy collection and connection to a private wire networks.

The District Plan should promote the protection of their local heritage. Councils are often of the view that the heritage of their local area and district is compromised by State Government legislation which allows a range of works to be carried out as either exempt or complying development.

Recommendation:

31. Consider measures to enable sustainable water utility infrastructure and water-sensitive urban design in District Plans.

32. Promote the requirement for adequate air quality monitoring.
33. Promote heritage values and the protection of local heritage.

6.3 BASIX

The Central District Plan should consider the review and amendment of the BASIX State Environmental Planning Policy to require higher sustainability performance targets. Rating systems need to be kept up to date as materials and technologies improve. In NSW, the BASIX rating system has been important in improving the design and construction of buildings. SSROC member councils are concerned that it has not evolved over time to reflect changing expectations and ever-improving potential for energy and water efficiency. New construction and renovation could be done to a much higher standard of efficiency than that currently required under BASIX.

Recommendation:

34. That GSC consider and support the review and updating of BASIX State Environmental Planning Policy and adoption of higher sustainability performance benchmarks.

6.4 Renewable and low-carbon local energy solutions

The Plan omits key priorities to deliver sustainable Districts, such as promoting local renewable and low-carbon energy generation. The District Plan should explore opportunities to generate power locally in a sustainable way. This has a lot of advantages for efficiency of the productive city.

SSROC supports actions to respond to climate change and to reduce carbon emissions. We are working with Councils to establish a Community Energy Services Organisation that will provide residents and small businesses with energy efficiency and related services as well as some products. We are in contact with the OEH to consider this a pilot that could be rolled out to the rest of NSW, and would therefore urge the Commission to support this initiative and to view it as a pilot for broader implementation.

Recommendation:

35. The District Plans should identify as priorities, renewable and low carbon energy generation, waste recovery and sustainable local power generation, acknowledging the need for enabling policies to implement the NSW Climate Change Policy.

6.5 The Green Grid

SSROC welcomes the recognition of the value small pockets of native vegetation to the Central District. We would urge the Commission to value other pockets of green space too, incorporate them into the Green Grid, and increase the number as much as possible. SSROC, together with the Sydney Coastal Councils Group and with funding from the Australian Government, has developed a Connected Corridors map as a tool for Local Government to use in their planning processes. This mapping is hosted by Greater Sydney Local Land Services, and is available for

access¹. We strongly urge the Commission to use this mapping in the Green Grid, and to extend the mapping to the rest of metropolitan Sydney.²

SSROC strongly supports design-led planning, including the designing-in of interconnected green spaces into urban renewal precincts. While design-led planning undoubtedly needs to be people-centred, the role of green spaces and biodiversity in human health and well-being should be acknowledged and incorporated into plans. The benefits are in addition to those generally understood such as enhancing property values. Increasingly, these benefits can be explicitly identified and are proven³ and include reduced incidence of cancer, heart disease, diabetes, poor mental health, and childhood ADHD, asthma and allergies.

SSROC appreciates the recognition of a range of ecosystem services that is implicit in the Plan. We would urge the Commission to recognise these services explicitly, such by improving the air that we breathe by absorbing pollutants from and maintaining oxygen in it, sequestering greenhouse gases, reducing stormwater runoff and controlling erosion.

7 Jobs and employment lands

Councils concerned that the three cities concept for Sydney must not lead relative de-emphasising of jobs creation in local and district centres. Apart from maximizing opportunities for local jobs and employment outcomes for urban renewal corridors, employment lands need to be protected.

The Central and South District Plans propose a precautionary approach to employment land rezoning but arguably fail to provide councils with the policy tools to undertake this. There is a need to consider strategies to deliver job targets and manage the conflict between residential and employment development. This could include quarantining the B3 zone, applying a minimum non-residential FSR in the B4 zone and encouraging office over residential development.

Recommendation:

36. The Districts Plans should identify strategies to deliver job targets, protect employment lands and manage the conflict between residential and employment development.
37. The Central District Plan should devise planning mechanisms, beyond the use of the *Industrial Lands Strategic Assessment Checklist*, to preserve remaining industrial land for local light industry to service the increasing population.

¹ Available:

<https://trade.maps.arcgis.com/apps/webappviewer/index.html?id=3afa804b96ac4d69a74e9b1ed9780328>

² Connected Corridors for Biodiversity mapping covers the following LGAs: Bayside, Burwood, Canterbury-Bankstown, Canada Bay, Georges River, Inner West, Mosman, North Sydney, Northern Beaches, Randwick, Sydney City, Sutherland, Waverley, Willoughby and Woollahra.

³ Supporting evidence for all these examples can be provided by SSROC, or by reference to Connected Corridors for Biodiversity: Guide to regulatory tools, financial incentives and other mechanisms for promoting biodiversity conservation on private property, December 2016, SSROC available: www.ssroc.nsw.gov.au/publications.

C. SPECIFIC ISSUES FOR THE CENTRAL DISTRICT PLAN

These comments are in addition to those made in part B, which cover both South and Central District Plans categorised under the three broad themes of the South District Plan.

A Productive City

8 Transport

8.1 Parramatta Road

There is need for an efficient and sustainable transport system within the Central District. The draft Plan identified key current and planned transport infrastructure. One of the transport solution options for the Parramatta Road is arguably the Guided Electric Vehicle System for Parramatta Road that has been endorsed by the joint Inner West Council/Canada Bay Council study. It has been found by independent analyses that Guided Electric Vehicle System is superior to the rapid bus system currently proposed by the State Government. The District Plan should at the least identify this transport option for further investigation.

This innovative and transformative transport solution in this strategic transport corridor could be a catalyst for private investment. It could provide the opportunity to better align the area with the State Government's urban renewal and redevelopment proposals to enhance the liveability, sustainability and employment outcomes in the Parramatta Road Urban Renewal area.

The proposed Parramatta Light Rail also has significant economic and transport implications for the Central District and Sydney and should be included in the District Plan

Recommendation:

38. Include Guided Electric Vehicle System as an option for investigation for the Parramatta Road urban renewal area.
39. Include the Light Rail proposed for the Parramatta Road corridor in the Central District Plan.

8.2 Improve transport connectivity and infrastructure

Arguably, Green Square is at the heart of the Central District and is strategic in transport planning for the district. The Central District Plan needs to give the necessary recognition for the need for improved rapid transit in the CBD-Green Square-Airport and surrounding area corridor. This has huge economic prospects for the area. There is need for the Transport Futures Strategy to emphasise the planning for the corridor.

The District Plan does not expressly mention the importance of bus and rail transport interchanges. The operational efficiency of the interchanges need to be reviewed or evaluated. Some interchanges such as the Bondi Junction and the Edgecliff would need to be reviewed with accessibility as one of the key criteria. This will help to address operational deficiencies and identify areas and issues for improvement.

Ferries are important infrastructure for work, leisure and tourism. The role of ferries as a transport mode requires special consideration. The Central District Plan should include the review of ferry facilities, particularly wharfs and associated dry land infrastructure.

Recommendations:

40. The GSC should prioritise inclusion of planning for improvement of transport to Green Square and southern Sydney in the NSW Transport Futures Strategy. The post 2031 new mass transit for south of Kingsford and new east-west connections should be brought forward to support connectivity and economic development.
41. Review of operational efficiency of bus and rail interchanges in Central District to improve accessibility.
42. District Plan should include review of ferry facilities and related land infrastructure to improve the economic strategic role of ferries.

8.3 Westconnex Walking and Cycling Plans

The Westconnex provides an opportunity to boost active transport. The Central District Plan can herald a district-wide Walking Network Plan and a Cycling Network Plan that could be developed for the Westconnex corridor. The Walking Network Plan could focus on 2km journeys and Cycling Network Plan to focus on 5km journeys within the corridor precincts.

Recommendation:

43. The Central District Plan should consider developing district-wide Walking Network Plan and Cycling Network Plan in collaboration with SSROC member councils.

8.4 F6 to M1 Link

While the Plan notes the possibility of a motorway link between the M1 Princes Highway and Sydney motorway network, F6 Extension, it does not clearly highlight the conflict between this potential land use and that put forward in the high level design of the green grid. The Plan states that “This motorway should be designed to retain and protect recreational open spaces and the ecological values of the corridor.” If this very ambitious design objective is to be achieved, the matter will need to be given a much higher priority than is suggested by a single sentence on page 141.

Recommendation:

44. The Central District Plan should recognise this conflict between the value of the green space to the local community and Sydney more generally and value of the motorway, and recommend a mechanism whereby this conflict might be resolved.

9 Urban renewal and strategic centres

9.1 Parramatta Road Urban Renewal

Large growth is envisaged in the Parramatta Road Urban Renewal corridor. This requires the timely delivery of infrastructure and amenities for the new and existing residents and the local business community. The District Plans needs to demonstrate how this huge redevelopment and renewal precinct will contribute to the key strategic priorities of the plan and the collaborative State-Councils roles and responsibilities.

Recommendation:

45. The Central District Plan should highlight how the Parramatta Road Urban Renewal corridor contributes to the productive, liveable and sustainable city priorities of the GSC and the role of NSW Government and local councils in the urban renewal, planning and implementation process for the corridor.

9.2 Strategic Centres status for Burwood and Bondi Junction

The apparent downgrading of Burwood from a Strategic Centre to a District Centre under the Draft Central District Plan came as a surprise. The status should be reconsidered. This is because in the last decade, every metropolitan plan has identified Burwood as a major centre and has significant potential for economic and strategic development. The centre has grown significantly in the last decade, taking advantage of the area's strong local economy and excellent transport infrastructure. Strategic Centre status will enable community, business, local council and state agency stakeholders to further harness the accessibility and economic potential of the centre.

The downgrading of Bondi Junction from Strategic Centre to District Centre requires careful and regional contextual reconsideration. Bondi Junction is arguably a strategically important, if not the key commercial centre in the Eastern Suburbs.

Recommendation:

46. Burwood and Bondi Junction should be reconsidered for reinstating as Strategic Centres.

A Liveable City

10 Affordable Housing

The GSC should make the Central District Plan definition of affordable rental housing to be consistent with the National Rental Assistance Scheme definition. This will ensure that affordable rental housing provided, accommodate households on low and medium income. The inclusion of medium income households is important for key workers' housing crisis in the Central District. The GSC's use of 'very low and low' household incomes leaves out key workers such as teachers, nurses, community services workers and firefighters, unless if the GSC introduces affordable an housing pathway or option for this cohort.

Recommendation:

47. Key Workers' housing is a crucial affordable housing issue for the Central District. Any affordable rental housing targets for Central District should not exclude Key Worker

moderate income households till specific affordable housing solutions have been devised for this category of workers.

11 Use of Golf courses

The need for recreational opportunities are likely to increase into the future with increasing populations. On the other hand, councils could find it increasingly difficult to acquire lands for open space and recreational services because of lack of availability and high cost of land. Innovative ways and options would need to be found and trialled for existing open spaces, such as golf course that could have capacity for further sporting and recreational opportunities. This is currently being trialled at Barnwell Park Golf course in the City of Canada Bay.

Recommendation:

48. The Central Plan needs to explore alternative sporting and recreational activities that can be trialled on golf courses to expand their uses.

A Sustainable City

12 Ecological Sustainability

The Central District Plan should consider Parramatta River Catchment Group's RiverWatch Monitoring Program with the view to its inclusion in the development of the updated criteria for water quality and waterway health.

Recommendation:

49. The Parramatta River Catchments Group's RiverWatch Monitoring Program should be included for consideration in the updating of water and waterways quality.

13 District's environmental heritage

The District Plan should make an impact on the protection of their local heritage. Councils are often of the view that the heritage of their local area and district is being compromised by State Government legislation which allows a range of works to be carried out as either exempt or complying development.

A council-State Government collaborative balance can be found between development and heritage protection.

Recommendation:

50. The District Plan should identify or develop a mechanism for State Government agencies to engage with councils on environmental heritage matters in exempt and complying developments.

D. SPECIFIC ISSUES FOR THE SOUTH DISTRICT PLAN

These comments are in addition to those made in part B, which cover both South and Central District Plans categorised under the three broad themes of the South District Plan.

A Productive City

14 Transport

14.1 Western Sydney Transport Links

The draft South District Plan did not adequately address the need for South District - Greater Parramatta and Western Sydney City major transport connections. Residents of Southern Sydney need equitable access to the growth in job opportunities in Western Sydney, and in particular the Greater City of Parramatta and the future Western Sydney Airport.

Currently, when travelling from the South District to Parramatta, rail commuters need to back track from Central, Redfern or Sydenham which is inefficient and worsens congestion on the Illawarra Line. It also encourages reliance on cars. A future rail link or public transport service from Hurstville to Bankstown and to Parramatta would allow commuters to access jobs in Greater Parramatta and Western Sydney without being forced to use the congested Illawarra Line.

This is a major constraint in accessing job and economic opportunities. Access to expected growth in jobs and services in Greater Parramatta and around the Western Sydney Airport is crucial for South District residents, including those in the Sutherland Shire.

Apart from improvements and widening of existing connection roads, there is need for the District Plan to consider light rail connection to Parramatta. Similarly, rail or public transport link between Sutherland and Glenfield will boost access to jobs and take pressure off the Illawarra Rail Line.

Recommendation:

51. That key infrastructure such as rail link be identified in the District Plan to improve South District connections with the Greater Parramatta and the Western City to ensure greater economic and employment opportunities.

15 Strategic Centres

The South District despite its strategic importance has only one strategic centre. Unfortunately, Bankstown and the Bankstown Airport /Milperra Specialised Centre, identified as Strategic Centres in the *A Plan for Growing Sydney*, were downgraded in the draft District Plan. SSROC urges the GSC to reconsider the decision on Bankstown (as emphasised in Section 5, page 13).

Hurstville can also be reconsidered for strategic centre reinstatement and included as part of the Eastern City economic corridor.

Recommendation:

52. Bankstown should be redesignated as a Strategic Centre”. Hurstville could also be similarly reclassified and linked up with the Eastern City that currently extends to nearly Kogarah.

A Liveable City

16 Affordable Housing

16.1 Housing strategy, targets and investigation areas

There is need to engage with councils and the community in establishing 20-year housing targets. For a strategic, community focused and coordinated approach to occur, councils should first complete local housing strategy before targets are established. Considering the emphasis that the District Plan places on housing strategies, the Department of Planning and Environment should prepare housing strategy toolkit as a priority. Investigations Areas for housing should not be listed in the District Plan as there is no sufficient time to start and complete processes such as engagement with community, needs analysis and Council approval before the District Plans are finalised.

It is important that the strategies and approaches to deliver affordable housing are not only focused on new urban renewal and greenfield large developments. Affordable housing outcomes in the South District Plan could be targeted to all Planning Proposals with substantial residential development.

Recommendations:

53. The Department of Planning and Environment should prepare housing strategy toolkits for use by councils.
54. Councils should be allowed to complete local housing strategies first before long term-housing targets are established for councils.
55. Caution should be exercised in relation to identification of investigation areas for housing in the District Plans. Preferably, processes and analyses should be undertaken by State Government collaboratively with councils before investigation areas are identified.
56. Planning Proposal areas with substantial or large residential development should also be targeted for affordable housing.

16.2 Sydenham to Bankstown Urban Renewal Corridor – Affordable Housing Target

The draft South District Plan seems silent on whether and the scale of affordable housing that will be delivered as part of the Sydenham to Bankstown renewal strategy. The draft District Plan needs to address this. This is the more urgent as the draft Sydenham to Bankstown Urban Renewal Corridor Strategy made no reference to affordable housing and set no targets for same throughout the corridor. Affordable housing is an important issue on the Sydenham to Bankstown corridor. For example, the former City of Canterbury area has lower median household income of

\$1,209 compared to \$1,447 for Greater Sydney and higher proportion of households in housing rental stress of 38.4% compared to 25.1% for Greater Sydney.

An analysis undertaken by Judith Stubbs and Associates in 2016 for SSROC in a report, *Planning and Economics in Selected Precincts of the Sydenham-Bankstown Corridor*, shows that affordability is likely to worsen in the future. This is because the redevelopment of the corridor will upward pressure on prices and older and lower amenity housing will be lost. The study recommended strong planning intervention, in particular Mandatory Affordable Housing Contributions in order to create affordable housing for low and moderate income households.

Recommendation:

57. The South District Plan should set a target for affordable housing for the Sydenham to Bankstown Urban Renewal Corridor.
58. That planning mechanisms for affordable housing, including Mandatory Housing Contributions and affordable housing products or solutions for moderate income and Key Workers be particularly focused on the corridor considering its accessibility for workers in the Eastern City corridor who are unable to afford housing in the city.

A Sustainable City

17 Resilience

While resilience is an overarching priority for the Sydney metropolitan area, the draft South District Plan does not seem to demonstrate this. For example, the GSC in liaison with relevant state agencies and in collaboration with councils could establish a carbon 'budget' or footprint for large scale precinct developments and urban renewal corridors such as the Sydenham to Bankstown corridor and the Central to Eveleigh urban transformation precinct.

Maximum permissible carbon footprints could also be established in consultation with councils. This will boost carbon minimalist designs at both precinct and specific property development levels.

Recommendation:

59. The South District Plan should establish a permissible carbon footprint in consultation with councils, for urban renewal corridor, Priority Precincts and large urban redevelopment projects.

18 Sustainability priority

Sydney Harbour is justly noted in the Central District Plan as "one of Greater Sydney's most recognised and valuable assets". SSROC would also hope to see Botany Bay similarly acknowledged: while not achieving the same iconic status, Botany Bay has tremendous cultural significance (Aboriginal and European), and is likewise a working waterway and local recreational

facility. Its water quality has in recent years been improved through the Botany Bay Water Quality Improvement Program.

The draft South District Plan should seek opportunity for a district wide approach to waste management. This is important as there is need to plan for growing population and increase in the number of households that medium and high rise apartments and complying developments will entail.

Recommendation:

60. The South District Plan should include provision to identify land for district-wide facilities and projects that enable future waste processing, reuse and recycling and the mechanism to implement this.
61. The South District Plan should recognise and reinforce the importance of Botany Bay, as a cultural, recreational, ecological and economic asset.

E. SUMMARY OF ISSUES AND RECOMMENDATIONS

KEY INITIATIVES IN THE PLANS SUPPORTED BY SSROC MEMBER COUNCILS

SSROC supports the:

- Three Cities Metropolis
- Three hierarchical centres
- Alignment of land use planning and transport
- Review of the Metropolitan Plan
- Vision of a Liveable City
- Affordable Rental Housing Target.

KEY ISSUES FOR BOTH CENTRAL AND SOUTH DISTRICTS

1. The District Plans should 'institutionalise' effective collaboration strategies and approaches by identifying the roles and responsibilities of State agencies and councils in the collaboration process for Urban Renewal Precincts and large Redevelopment Sites.
2. The District Plans should specify a model, approach or framework for Council-State agencies collaboration in major urban development initiatives.
3. The revised Central District Plan should include more details such as actions, targets and milestones for key elements, including land use, transport and infrastructure.
4. The District Plans should provide guidance on the nature of the review and the type of acceptable changes to LEPs that will give effect to the District Plan.
5. The District Plan should flag innovative Council-State and non-government housing providers' partnerships for affordable housing, housing finance models and mechanisms for their implementation.
6. The Central and South District Plans should identify the major renewal projects and highlight how these initiatives contribute to the key priorities of the plan.
7. The GSC should consider inclusion of implementation plan or strategy as part of the District Plans. This should detail priorities, actions, measurable targets, timeframes and possibly indicative sources of finance and other resources.
 - urban intensification to be linked to social and environmental as well as economic infrastructure capacity for improved amenity,
 - performance indicator for affordable housing, education, health, community services, open space and place-making as elements of the capacity of an area to accommodate growth,
 - improving walking, cycling and other active transport as key elements of the sustainability, accessibility and liveability improvements expected alongside urban intensification,
 - acknowledging the role of green space, active and passive recreational space, biodiversity and amenity trees in human health and wellbeing,
 - innovation in energy supply and waste management to reduce community costs and environmental impacts.
8. The principles that underlie liveability should be recognised in the District Plans, particularly in the Central and South Districts.

9. The District Plans should set targets for schools and education facilities, health services, open space, recreational facilities and environmental sustainability as is the case with housing and employment.
10. The District Plans should identify city performance benchmarks for infrastructure and amenities at the local, district and metropolitan levels and for Urban Renewal Precincts, Priority Precincts and large Redevelopment Sites.
11. That GSC work collaboratively with the Department of Planning and Environment and councils to develop a place-making tool kit to assist in the engagement of communities to identify local values and aspirations of communities and design and create places that give effect to these.
12. The tool kit could provide benchmarks for techniques and approaches for councils to implement in engaging with local communities and in creating people oriented places.
13. Targets should be set for transport and accessibility, environmental or precinct sustainability, access to schools, health and amenities and recreation and open spaces.
14. Compilation of Infrastructure Priority List to maximise district planning outcomes should take into consideration SSROC member councils' concept of liveability and associated infrastructure gaps for the Central and South Districts.
15. SSROC member councils' Affordable Housing Target of 5% to 15% of all new dwellings should be embedded in District Plans for Central and South Districts, constituent LGAs, and Priority Urban Renewal Precincts in accordance with benchmarks set out in the SSROC's Affordable Housing Submission to the GSC.
16. The District Plan should go further to specify that affordable rental accommodation created in accordance with the above targets be dedicated or secured as affordable rental housing in perpetuity, and managed by a Community Housing Provider.
17. District Plan's affordable housing strategy should target housing diversity, that is a split between single-person and family housing.
18. District Plan should facilitate local government role in affordable housing through a mandatory requirement for affordable housing in their Local Environmental Plans (LEPs), where there is land value uplift to support its application in Priority Urban Renewal Precincts, large redevelopment sites and government land. Rates should be set at reasonable, feasible and equitable levels for a particular area.
19. Subject to the above, councils could be required to adopt, monitor and report against the Affordable Housing Target as part of their annual reporting requirements, and to develop needs based strategies to achieve this.
20. District Plans should support Mandatory Affordable Housing Contributions within Priority Urban Renewal Precincts, large redevelopment sites and government land (State and local) to create affordable rental housing in perpetuity.
21. At least half of all new affordable housing created be affordable rental housing in perpetuity for very low and low income households.
22. The District Plan and the GSC should facilitate the inclusion of all councils within the Central and South Districts under State Environmental Planning Policy No 70 (Affordable Housing).
23. Councils that demonstrate their ability to efficiently deliver medium density housing should be exempt from the draft MDDG. Such provision for exemption was applied under a previous strategy to stimulate medium density housing in selected areas, the State Environmental Planning Policy No. 53.

24. The District Plan should address the issue of upfront infrastructure to support the targeted level of housing.
25. The Districts Plans need to be specific with commitment or proposal for a mechanism or model for value capture that can be applied consistently across all the six districts.
26. The District Plan should give guidance on Voluntary Planning Agreements to local councils, eliminate ambiguity, provide consistency in approach and address any concerns that VPA could threaten the economic viability of development.
27. Value Capture mechanism should enable Councils and the Department to give consent only where the developer has offered to provide, by an agreement, adequate infrastructure and public benefits to make what would otherwise be an unacceptable development in planning terms, to become acceptable.
28. The District Plan should provide clarity of infrastructure funding streams for meeting the infrastructure challenge of urban growth.
29. That the Greater Sydney Commission consider reinstating previous Strategic Centres that were designated as District Centres in the SSROC area, particularly Bankstown.
30. The Central and South District Plans should consider ideas and proven models for waste minimisation, renewable energy and waste recycling options.
31. Consider measures to enable sustainable water utility infrastructure and water-sensitive urban design in District Plans.
32. Promote the requirement for adequate air quality monitoring.
33. Promote heritage values and the protection of local heritage.
34. That GSC consider and support the review and updating of BASIX State Environmental Planning Policy and adoption of higher sustainability performance benchmarks.
35. The District Plans should identify as priorities, renewable and low carbon energy generation, waste recovery and sustainable local power generation, acknowledging the need for enabling policies to implement the NSW Climate Change Policy.
36. The Districts Plans should identify strategies to deliver job targets, protect employment lands and manage the conflict between residential and employment development.
37. The Central District Plan should devise planning mechanisms, beyond the use of the *Industrial Lands Strategic Assessment Checklist*, to preserve remaining industrial land for local light industry to service the increasing population.

SPECIFIC ISSUES FOR THE CENTRAL DISTRICT PLAN

38. Include Guided Electric Vehicle System as an option for investigation for the Parramatta Road urban renewal area.
39. Include the Light Rail proposed for the Parramatta Road corridor in the Central District Plan.
40. The GSC should prioritise inclusion of planning for improvement of transport to Green Square and southern Sydney in the NSW Transport Futures Strategy. The post 2031 new mass transit for south of Kingsford and new east-west connections should be brought forward to support connectivity and economic development.
41. Review of operational efficiency of bus and rail interchanges in Central District to improve accessibility.

42. District Plan should include review of ferry facilities and related land infrastructure to improve the economic strategic role of ferries.
43. The Central District Plan should consider developing district-wide Walking Network Plan and Cycling Network Plan in collaboration with SSROC member councils.
44. The Central District Plan should recognise this conflict between the value of the green space to the local community and Sydney more generally and value of the motorway, and recommend a mechanism whereby this conflict might be resolved.
45. The Central District Plan should highlight how the Parramatta Road Urban Renewal corridor contributes to the productive, liveable and sustainable city priorities of the GSC and the role of NSW Government and local councils in the urban renewal, planning and implementation process for the corridor.
46. Burwood and Bondi Junction should be reconsidered for reinstating as Strategic Centres.
47. Key Workers' housing is a crucial affordable housing issue for the Central District. Any affordable rental housing targets for Central District should not exclude Key Worker moderate income households till specific affordable housing solutions have been devised for this category of workers.
48. The Central Plan needs to explore alternative sporting and recreational activities that can be trialled on golf courses to expand their uses.
49. The Parramatta River Catchments Group's RiverWatch Monitoring Program should be included for consideration in the updating of water and waterways quality.
50. The District Plan should identify or develop a mechanism for State Government agencies to engage with councils on environmental heritage matters in exempt and complying developments.

SPECIFIC ISSUES FOR THE SOUTH DISTRICT PLAN

51. That key infrastructure such as rail link be identified in the District Plan to improve South District connections with the Greater Parramatta and the Western City to ensure greater economic and employment opportunities.
52. Bankstown should be redesignated as a Strategic Centre". Hurstville could also be similarly reclassified and linked up with the Eastern City that currently extends to nearly Kogarah.
53. The Department of Planning and Environment should prepare housing strategy toolkits for use by councils.
54. Councils should be allowed to complete local housing strategies first before long term-housing targets are established for councils.
55. Caution should be exercised in relation to identification of investigation areas for housing in the District Plans. Preferably, processes and analyses should be undertaken by State Government collaboratively with councils before investigation areas are identified.
56. Planning Proposal areas with substantial or large residential development should also be targeted for affordable housing.
57. The South District Plan should set a target for affordable housing for the Sydenham to Bankstown Urban Renewal Corridor.

58. That planning mechanisms for affordable housing, including Mandatory Housing Contributions and affordable housing products or solutions for moderate income and Key Workers be particularly focused on the corridor considering its accessibility for
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61. The South District Plan should recognise and reinforce the importance of Botany Bay, as a cultural, recreational, ecological and economic asset.

F. ATTACHMENTS - EVIDENCE BASE AND SUPPORT REPORTS

List of Attachments (attached separately)

1. Attachment A: SSROC Memorandum of Understanding on Urban Intensification and Urban Renewal
2. Attachment B: Liveability Indicators and Mapping Report
3. Attachment C: SSROC's Affordable Housing Submission to the Greater Sydney Commission
4. Attachment D: SSROC Submission on Medium Density Design Guide