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Infrastructure
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Ref No: F2026/00028

To Whom it May Concern,

Re: Draft Sydney Region Plan

Randwick City Council appreciates the opportunity to comment on the Government's planning priorities and strategic directions for guiding Sydney's growth, as outlined in the exhibited draft Sydney Plan (draft Sydney Plan), New Approach to Strategic Planning Discussion Paper (Discussion Paper) and the draft Industrial Lands Policy (draft IL Policy).

Council acknowledges the Government's commitment to shaping a sustainable, equitable and resilient future, and recognises the importance of establishing an integrated strategic framework to guide land use planning and decision making in response to the complex social, economic and environmental challenges facing metropolitan Sydney. However, the proposed framework, in its current form, lacks the level of detail and the clear planning commitments needed to support effective implementation across several key areas. These include (but are not limited to) infrastructure planning, heritage conservation, place based character and design, and the integration of transport and land-use planning. Strengthening these components would be essential to ensuring the framework can deliver on its stated ambitions and provide councils with the clarity required to plan confidently and consistently.

The proposed policy framework is notably underpinned by a strong emphasis on significantly increasing housing supply, particularly in and around centres, transit corridors and major employment nodes. This direction is further reinforced through a newly proposed strategic planning framework which closely links the draft Sydney Plan to local planning processes and recent State led housing reforms. While the need to address the housing crisis and deliver housing to meet population needs is unquestionable, it is equally imperative that these objectives are appropriately balanced with broader social and environmental considerations and the interests of local communities, consistent with the intent of the *Environmental Planning and Assessment Act 1979*.

As a key local government area in Sydney's east, Randwick City continues to proactively plan for housing growth while facilitating the timely delivery of essential local infrastructure. Council remains committed to safeguarding the City's amenity and community wellbeing through sustainable and staged growth, heritage conservation, responsible environmental management, and the protection of our unique local character. For these reasons, Council maintains that any intensification in housing or employment must be contingent on commensurate investment in infrastructure (including social infrastructure and transport), with a focus on achieving high quality locally responsive design and sound environmental planning outcomes.

The first part of this submission outlines Council's priorities and concerns in relation to a range of issues including housing targets, affordable housing, infrastructure planning, and heritage directions contained in the Discussion Paper and draft Sydney Plan and provides recommendations to ensure the framework will deliver outcomes that are both locally responsive and regionally impactful. This is followed by comments on the draft Industrial Lands Policy.

A New Approach to Strategic Planning: Discussion Paper

The *New Approach to Strategic Planning: Discussion Paper* outlines a simplified strategic planning framework for NSW built around a three-tiered hierarchy of strategic plans and seven statewide priorities addressing housing supply and diversity, affordable housing, jobs and economic growth, infrastructure coordination, vibrant and liveable places, and industrial and employment lands. These priorities are intended to be embedded consistently across State, Regional and Local strategic planning.

The Paper sets out the rationale for reform, emphasising the need for a more consistent, transparent and outcomes focused system capable of better responding to housing demand, infrastructure delivery and environmental challenges. It also proposes clearer roles and responsibilities for State and local government, to facilitate a more coordinated approach to long-term growth and resilience across NSW.

1. General comments

As an overarching comment, Council supports the broad goal of creating a more coherent, transparent and outcomes focused strategic planning system. It is agreed that the current strategic planning environment is fragmented, with multiple overlapping strategies, inconsistent regional approaches and limited clarity around the relationship between State and local plans. NSW has accumulated an array of plans at the state, regional, district and local level, with each plan having its own timeframe for operation, legal status, updating cycles and consultation processes. This can create overlap, confusion and misaligned priorities for Government, councils and local communities. Given these complexities, a simplified hierarchy has the potential to:

- Reduce duplication
- Improve transparency for communities
- Provide clearer expectations for councils; and
- support more coordinated infrastructure planning

Notwithstanding Council's support in principle, it is important to highlight that the success of the new framework will ultimately depend on how effectively it recognises the diversity of local government areas across NSW, particularly highly urbanised, infrastructure constrained LGAs such as Randwick City. Ensuring that the framework is flexible and responsive to accommodate different local contexts, constraints and community expectations will be essential in achieving equitable and sustainable outcomes across the Sydney region.

2. State Land Use Plan

Council supports the development of a State Land Use Plan in concept; however, concerns are raised regarding the sequencing of the reform program given the proposed Plan (which is intended to guide regional plans and local strategic planning) is not yet publicly available for review.

This approach limits the ability of councils to make a meaningful assessment of how the proposed system will function in practice, and whether it will lead to realistic and achievable expectations for housing, employment and infrastructure delivery. Advancing structural reforms ahead of the State Land Use Plan being released risks embedding a framework without clarity on the strategic directions, spatial priorities or growth expectations that will underpin it. This approach creates uncertainty for councils, communities and industry, and undermines the capacity to provide informed and constructive feedback on the proposed system.

Given these issues, Council strongly recommends that the State Land Use Plan be released for full public exhibition prior to finalising the new strategic planning framework to ensure transparency, informed feedback and genuine collaboration.

3. The Need to Recognise Context

As noted throughout this submission, Council contends that the new planning system must recognise the individual contexts of each local government area. Randwick is a fully urbanised LGA with limited redevelopment capacity and high land values. As a coastal council, visitation plays a key role in infrastructure servicing, maintenance and renewal. Strategic planning reforms must acknowledge constraints such as finite land availability and limited opportunities for large scale renewal, environmental issues (e.g. coastal hazards, biodiversity areas and flood prone land), heritage, established neighbourhood character, aging infrastructure and large-scale institutions (e.g. the University of NSW and Randwick Hospitals campus). In combination, these unique features and characteristics shape land use patterns and movement requiring local responses to strategic planning.

A uniform approach to growth targets or land use expectations risks creating unrealistic obligations for councils in established areas. A place based, evidence driven approach is essential to ensure that strategic planning reforms are equitable, achievable and aligned with local conditions. To this end, Randwick City Council strongly supports a framework that recognises the diversity of LGAs across NSW and allows for tailored responses that reflect local constraints, opportunities and community values.

4. Infrastructure Alignment

Council strongly supports the Discussion Paper's focus on aligning land use planning with infrastructure delivery. This alignment, however, must be binding rather than aspirational, underpinned by clear funding commitments, developed collaboratively with councils, and sequenced to ensure growth does not exceed infrastructure capacity. The State Government's reforms prioritising rapid housing delivery, as reinforced in the Discussion Paper, risk enabling future housing growth that is misaligned with community infrastructure needs.

Randwick's experience demonstrates that infrastructure, particularly transport, open space, schools and utilities, often lags behind population growth. Without a robust infrastructure framework in place, the new planning system will struggle to deliver its intended outcomes. Additional comments on infrastructure funding and delivery are provided further in this submission.

Recommendations:

- Release the State Land Use Plan for full public exhibition prior to finalising the new strategic planning framework
- Align the Sydney Plan with a more detailed State Infrastructure Strategy that addresses LGA or district specific infrastructure needs and priorities with specific projects such as transport infrastructure, utility upgrades, hospital/health investment, education needs, regional open space and other improvements that address resilience to heat, flooding and climate impacts.
- Ensure infrastructure planning contained in the NSW Infrastructure Strategy is supported by clear funding commitments and sequenced to keep pace with population growth and demographic trends at the local level
- Provide transparency on the Housing and Productivity Contributions and expenditure at the local level
- Embed flexibility in the new strategic planning framework to recognise the diversity of LGAs across NSW; and
- Adopt a place-based, evidence driven approach to growth.

Draft Sydney Plan

The draft Sydney Plan establishes the strategic directions and spatial priorities to shape how and where the Sydney Region will accommodate housing and jobs over the coming decades. Covering 33 local government areas, the draft Plan builds on the indicative planning priorities outlined in the New Approach to Strategic Planning: Discussion Paper (to be further clarified under the forthcoming State Land Use Plan) and provides guidance on how State and Local Government should respond to and implement these priorities.

Council's comments on the draft Sydney Plan are set out as follows:

1. General comments

The draft Sydney Plan places considerable weight on expanding housing capacity, further affirmed by the proposed strategic planning framework under the Discussion Paper, which seeks to more closely align the Plan with local planning and recent State driven housing reforms including Transit Oriented Development (TODs) and the Low and Mid Rise Housing Code.

Key actions for councils in supporting housing delivery include reviewing and updating local strategic planning documents and Local Environmental Plans (LEPs) to ensure sufficient feasible capacity to meet housing targets (including delivering additional housing beyond targets). This includes identifying opportunities both within and outside designated Low and Mid-Rise Housing Areas, as well as facilitating higher-density development in locations with strong public transport access, particularly around transit hubs. Councils will be required to plan for a feasible number of homes in their local area not just theoretical capacity (i.e. plan for additional housing over the designated housing targets).

While Council recognises the critical importance of addressing Sydney's housing challenges, concerns are raised about the underlying premise that simply increasing housing supply would deliver diversity of dwellings housing aligned with changing households demographics and are affordable. This is pertinent given that Sydney continues to face acute affordability pressures despite increasing record levels of dwelling approvals, thus indicating that many of the key drivers of the housing crisis lie well beyond the influence and remit of Local Government housing approvals.

The draft Sydney Plan and its supporting documents do not adequately recognise the broad structural factors contributing to the housing crisis, such as escalating costs of construction and material costs, labour shortages, higher interest rates, commodification of housing stock as an investment asset and national tax settings. It is therefore neither reasonable nor effective to place the burden of resolving these systemic housing issues on local councils when the primary drivers sit well beyond their authority or capacity to influence via the planning system.

2. Lack of Clear Integration with the Local Strategic Planning Statement

The draft Sydney Plan does not provide sufficient clarity on how Local Strategic Planning Statements (LSPS) will operate within the new statewide strategic planning hierarchy. This is a significant concern, as LSPS documents have been central to guiding local planning since 2019 and remain the primary mechanism through which councils articulate local character, constraints, opportunities, and community values.

Without clear guidance, concerns are raised that councils will face conflicting expectations between the Sydney Plan, local housing targets and existing LSPS commitments. In particular the lack of clarity has the potential to create the following issues for councils:

- **Uncertain statutory status:** Although the Strategic Planning Discussion Paper proposes a simplified three-tier planning system, it does not explicitly state whether LSPS documents will be retained, replaced, or merged into a new local planning instrument or integrated into Council's IP&R framework. This uncertainty makes it difficult to plan future strategic work programs or understand how existing LSPS commitments will be treated.
- **Risk of duplication or inconsistency:** Without clear guidance on the relationship between the Sydney Plan, local housing targets, and existing LSPS directions, councils may face conflicting expectations. For Randwick City an already highly urbanised LGA with limited redevelopment capacity, this could result in duplicated effort, policy misalignment, or pressure to revise local priorities without a transparent framework.
- **Loss of local nuance:** Randwick's LSPS was developed through extensive community engagement and reflects the LGA's unique coastal character, heritage values, environmental constraints, and established urban fabric. The draft Sydney Plan's strong emphasis on housing delivery risks overshadowing these locally informed priorities, particularly in areas where growth must be balanced with heritage conservation, environmental protection, and infrastructure capacity.

Providing this clarity is essential to ensure that Randwick City Council can continue to deliver place-based planning that reflects the needs and aspirations of its community while aligning with broader metropolitan objectives.

Recommendations:

- Clarify the role, process, timing and status of the LSPS in the new planning framework and its relationship to the IP&R Framework
- Articulate how consistency between the LSPS and the Sydney Plan would be assessed; and
- Confirm how local priorities, particularly those relating to character, heritage, environmental constraints, and community values will be protected within a housing focused regional framework.

3. Housing

Dwelling Targets

Randwick City has made a sustained and substantial contribution to metropolitan housing delivery and is currently meeting (and capable of exceeding) the State Government housing targets indicated in the draft Plan. This includes notable increases in density along the Anzac Parade light rail corridor, particularly within the Kensington and Kingsford town centres (K2K) as well as additional capacity in and around other key centres, including housing investigation areas (under the comprehensive LEP) and through the Randwick Junction Town Centre Planning Proposal (recently placed on public exhibition). Housing growth has also been facilitated through recent incentives afforded to dual occupancy developments by reducing lot sizes.

The draft Sydney Plan sets out 5 year dwelling targets for each LGA; however, Council considers that this short term horizon is insufficient to support effective long term strategic planning. Delivering housing in a sustainable and coordinated way requires councils to plan well in advance for infrastructure, services, environmental management, and community facilities, with these processes typically operating on a longer cycle than 5 years. For this reason, it is recommended that the draft Sydney Plan incorporate housing targets for both a 5 and 10 year period. This longer term outlook would enable councils to undertake meaningful scenario planning, align land use decisions with infrastructure sequencing, and ensure that growth can be supported by the necessary transport, utilities, open space, and social infrastructure.

Council is also concerned about the draft Plan's expectation for Local Government to plan for housing beyond allocated dwelling targets, based on the assumption that not all approvals would result in completed dwellings. While this may be intended to create a buffer in the system, it introduces considerable uncertainty for councils about the extent of housing they are expected to accommodate. This lack of direction makes it extremely difficult for councils to undertake evidence based strategic planning or to assess the feasibility of meeting such expectations.

For Randwick City, this approach is particularly challenging as the LGA is already highly urbanised, with limited redevelopment capacity in areas serviced with frequent public transport such as the northern suburbs which have already been subject to considerable uplift (i.e. K2K, Randwick Junction and Housing Investigation Areas) compounded with physical, servicing, and environmental constraints in other areas. Requiring councils to plan for an unspecified level of additional dwellings beyond their allocated dwelling target is ambiguous, creates unrealistic expectations and risks undermining the credibility of the strategic planning process.

Given these issues it is considered that a more transparent and evidence based approach is essential with guidance for councils on the methodology for determining additional uplift beyond dwelling targets and how council existing contributions to housing supply will be recognised. Providing this clarity and guidance would be critical in ensuring that dwelling targets are realistic, deliverable and aligned with unique characteristics of established LGAs such as Randwick City.

Recommendations:

- Outline a collaborative approach with councils to identify dwelling targets beyond the 5 year timeframe to support long term strategic planning and infrastructure sequencing supported by suitable metrics on infrastructure demand; and
- Remove requirements for councils to plan for unspecified additional dwellings beyond allocated dwelling targets or issue clear guidance on how additional uplift is to be calculated and how existing housing contributions will be recognised.

Co-Living Development (Student Housing)

Concerns are raised that the draft Sydney Plan does not incorporate co-living housing (i.e. particularly purpose built student accommodation) within allocated dwelling targets, despite the significant role this form of housing plays in meeting housing demand generated by major institutions such as the University of NSW.

The proliferation of student housing, largely incentivised through the State planning framework, is a critical housing issue for Randwick City. Major redevelopment sites, particularly in areas that have undergone substantial planning uplift (such as the Kensington and Kingsford town centres and well located housing precincts under the Comprehensive LEP) are being taken up by co-living student housing projects. Moreover, the introduction of the Housing Delivery Authority pathway has accelerated this trend, further diverting strategic sites (reclassified as State Significant Development) away from broader housing needs.

In the past 5 years alone, approximately 5,558 co living dwellings have been approved in these areas, underscoring the scale and concentration of this shift. This has resulted in co-living housing developments effectively locking out planned dwelling capacity in highly accessible areas where mixed tenure and family appropriate residential development is most needed. As a result, co-living developments are displacing opportunities for a more balanced housing mix, impacting upon local housing diversity and failing to deliver genuine affordability.

Excluding student housing from the dwelling targets further compounds this issue by failing to recognise its contribution to overall housing supply and overlooking the cumulative impacts that transient student populations have on local infrastructure, transport, and services. Council has been advocating to the State Government to include co-living development in overall dwelling targets for a number of years and reaffirms our position that it would provide a more accurate and equitable representation of local housing demand and delivery.

Recommendations:

- Include co-living housing (particularly purpose built student accommodation) within allocated dwelling targets to ensure a more accurate and equitable representation of local housing demand and delivery; and
- Recognise the significant contribution of student housing to overall housing supply particularly in LGAs which host major educational institutions.

Affordable Housing

Randwick City has a high demand, high cost housing market, with significant indicators of housing stress and unmet affordable housing need. Analysis of Randwick's housing monitor shows:

- **High prices:** Median house and unit prices substantially exceed Greater Sydney averages*
- **Housing stress:** As of 2021 around 3,355 households (about 6.5% of all households) are identified as needing affordable housing in Randwick City, with families a major group in need.

**Median house and unit price for Greater Sydney is \$1,540,000 and \$805,000 vs \$3,069,000 and \$1,180,000 respectively for Randwick City*

Council has been proactive in addressing the housing affordability crisis via the planning system including meeting the housing targets set by the State Government via recent changes to planning controls under the Comprehensive Planning Proposal and more recently the Randwick Junction Planning Proposal (currently on exhibition).

Council also recently adopted the Randwick City Affordable Rental Housing Strategy with a 7.5% target for all dwellings in the LGA to be social or affordable housing by 2036.

The draft Plan requires councils to prepare individual Affordable Housing Plans to increase the supply of affordable housing. A more effective, equitable and resource saving approach would be for the State Government to take leadership by establishing a regional benchmark through a consistent, region wide Affordable Housing Plan together with targets. This could include a mandated minimum affordable housing levy applied across the region, with the flexibility for councils to set higher targets in areas of demonstrated need, such as Randwick City, subject to robust feasibility testing. A coordinated regional framework would provide greater certainty, reduce duplication, and ensure a more consistent and scalable delivery of affordable housing across the metropolitan area.

Recommendations:

- Establish a regional Affordable Housing Plan to replace individual council led plans, to facilitate consistency, equity and reduce duplication;
- Introduce a mandated minimum affordable housing levy across all councils, with flexibility for higher targets in areas of demonstrated need, such as Randwick City, subject to feasibility testing;
- Recognise and incorporate the substantial affordable housing demand in high cost, high housing stress LGAs when setting regional benchmarks and policy expectations;
- Incorporate an action for affordable housing levy in perpetuity through the Housing SEPP; and
- Address key recommendations of the Parliamentary Inquiry into Essential Worker Housing (2025) including the coordination role of HomesNSW to bring together key agencies, local government and infrastructure delivery.

4. Infrastructure Delivery and Funding

Need for stronger infrastructure alignment

As outlined throughout this submission, Council contends that any uplift in housing capacity in Randwick must be contingent on the provision of adequate infrastructure and services including public transport, open space, schools, health services, and utilities, rather than relying on aspirational or unfunded commitments.

From Randwick City's perspective, the draft Sydney Plan does not adequately provide the level of infrastructure commitment, sequencing, or clarity required to support housing and employment growth being signalled for the eastern suburbs. While the draft Sydney Plan acknowledges the need to align growth with infrastructure, it lacks the specificity, funding pathways, benchmarks and place based detail necessary to ensure that infrastructure delivery keeps pace with population and jobs increases.

It is also worth noting that major regional assets such as the Randwick Health and Education Precinct, Centennial Parklands, and the coastal beach environment impose additional operational, environmental, and servicing requirements and resourcing. These factors collectively limit the feasibility of further large scale uplift without substantial, upfront investment in infrastructure and careful consideration of cumulative impacts.

Without a clear, enforceable link between housing growth and infrastructure provision, there is a risk that communities will face further pressure on already constrained services and facilities, undermining liveability and community support for growth.

Recommendations:

- Strengthen alignment between housing growth ~~with~~ and infrastructure investment, including public and active transport, provision of new open space and embellishment of existing open space, community facilities, schools, health services and utility infrastructure;
- Identify priority district and local infrastructure projects necessary to support additional housing, such as in and around the Randwick Health and Education Precinct, town centres and along key transport corridors; and
- Require sequencing of housing delivery to ensure that infrastructure and services are delivered in advance of, or at least concurrently with, new development.

Infrastructure Funding

The draft Plan is largely silent on infrastructure funding commitments which is concerning given the overt focus on housing delivery. Inner city councils such as Randwick City which face considerable redevelopment pressures rely considerably on development contributions to fund new infrastructure to support population growth and new development. The development contributions system, principally the s7.12 Plan and to a lesser degree planning agreements are integral in ensuring that necessary infrastructure can be provided to support growing communities in our local area.

The s7.12 contributions framework was originally introduced as an easier user friendly mechanism, to enable councils to charge contributions on a fixed percentage based on the cost of works. The maximum that can be charged under the EP&A Regulation is 1% with the exception of a small number of councils that have been permitted to charge a higher percentage in defined areas or specific zones.

Concerns are raised that the 1% percentage rate has not been reviewed since it was introduced in 2006, and it has not kept pace with the increased costs of funding and delivering vital infrastructure. This is evidenced by development feasibility work undertaken for Council's infrastructure funding schemes (such as the K2K Infrastructure contributions framework), where independent economic development consultants found that an increase to the 1% levy was necessary to fund contemporary infrastructure commensurate with planned growth, while still also ensuring development feasibility.

A review of the 1% levy is thus long overdue, timely and necessary to provide a more appropriate baseline contribution amount to help recover a portion of the cost of infrastructure required to service the increase in housing deliver that is foreshadowed under the draft Plan. This may require a review of the Housing and Productivity Contributions (HPC) framework to take into account local infrastructure priorities. Accordingly, it is requested that a specific action be incorporated into the draft Plan requiring the Government urgently review the local infrastructure contributions framework in NSW to recognise the increased costs of infrastructure planning and delivery.

To ensure the public receives a fair share of benefits resulting from major developments, it is essential that Voluntary Planning Agreements be made available for State Significant Developments and other State led proposals so that councils can negotiate infrastructure delivery. In addition, structural reforms are needed to ensure integrity and transparency of the infrastructure planning system to ensure correct contribution fees and calculations and prevent underreporting.

Recommendations:

- Commit to a review of the outdated 1% s7.12 percentage rate to ensure the development contributions framework reflects the true cost of delivering essential infrastructure;
- Provide clear visibility of the Housing and Productivity Contributions (HPC) framework and expenditure to ensure a fair share of contributions is reinvested in local areas where it was generated;
- Allocate HPC funding to councils based on growth;
- Introduce legislative amendments to allow Council's to enter into VPAs with developers on State-led proposals;
- Create structural reforms to ensure accurate estimated development costs in development applications (with mandatory documentation) and payment of infrastructure contributions through the planning portal with penalties for false declarations; and

- Embed a clear commitment within the draft Plan for the NSW Government to modernise the local contributions framework as part of the broader housing and infrastructure reform program.

5. Heritage Conservation and Design Quality

The draft Plan makes no reference to heritage conservation, which represents a significant and concerning omission. Heritage, both Aboriginal and non-Aboriginal, is a fundamental component of Sydney's identity, character, and cultural continuity. It shapes the distinctiveness of local places, contributes to community wellbeing, and provides an irreplaceable record of the city's social, architectural, and environmental history.

In a mature and highly urbanised area such as Randwick City, heritage conservation is not a peripheral consideration but a core planning responsibility that must be integrated into strategic decision making. The absence of any meaningful discussion of heritage in the draft Plan risks undermining long standing conservation efforts, creating uncertainty for communities, and weakening the ability of councils to balance growth with the protection of valued places.

The need to integrate heritage considerations is even more critical in the context of the Government's housing delivery agenda with ad hoc contemporary development often producing building forms that are uniform, repetitive and lack design quality. Without explicit heritage safeguards, the city risks becoming visually homogenous, thus erasing the distinctiveness that makes neighbourhoods recognisable and meaningful. A recent case in point is Council's rigorous, evidence based Randwick Junction Town Centre Planning proposal, DCP and Urban Design Study that considers the full range of strategic considerations to guide orderly development, including heritage conservation, urban design excellence, infrastructure capacity, transport planning and the evolving character of the town centre. The orderly, transparent and place based approach (rather than ad hoc planning) offered through Council's centre wide planning proposal ensures that all future development is assessed within a coherent vision that prioritises good urban design, heritage conservation, and long-term public benefit.

To this end it is recommended that the draft Plan incorporate heritage conservation and orderly design as planning priorities recognising their critical role in terms of preserving local character, design excellence and cultural identity.

Recommendations:

- Incorporate heritage conservation (both Aboriginal and non-Aboriginal) as a core planning priority to ensure growth is balanced with the protection of Sydney's cultural identity and valued places; and
- Review the HDA criteria to ensure State led SSD/concurrent rezonings have demonstrated strategic merit by recognising council planning reviews underway or recently completed to provide certainty to the community in relation to heritage conservation and well-designed outcomes.

6. Transport and Connectivity

Mass Transit

The draft Sydney Plan provides a high-level vision for integrated land-use and transport planning; however, it does not sufficiently address the unique constraints, pressures and opportunities within inner city area such as the Randwick LGA. In particular, the draft Plan does not include any commitment to investigate a future metro or high capacity heavy rail connection to Randwick City. This is a critical omission, as the eastern suburbs remain the only inner metropolitan region in Sydney without access to heavy rail or metro services.

The absence of mass transit is particularly concerning given Randwick's major employment centres, most notably the Randwick Health and Education Precinct, which generate tens of thousands of daily trips, many originating from outside the LGA.

These pressures are further compounded by significant congestion on Anzac Parade, Alison Road and High Street, which already constrains bus reliability and operational efficiency. While the L2/L3 light rail has improved access to the CBD, it does not provide the capacity, speed or regional connectivity required to support a precinct of Randwick's scale and strategic importance nor an increase in housing as envisaged in the draft Plan. Without a high capacity mass transit solution, future housing growth will exacerbate delays, reduce productivity as well as undermine the precinct's state significant role.

Recommendations:

- Include a clear commitment in the draft Sydney Plan to investigate and plan for a future metro or heavy rail link to Randwick City; and
- Prioritise high capacity public transport links and active transport corridors connecting Randwick to neighbouring LGAs, key metropolitan destinations as well as east-west links.

Metropolitan Role

The Sydney Plan fails to recognise Randwick as a regionally significant employment, recreation, entertainment and innovation hub. Instead, it designates Randwick as a local centre, despite the presence of major metropolitan-scale institutions and destinations, including:

- UNSW, one of Australia's largest universities
- The expanding Randwick Health & Education Precinct which is one of Sydney's significant and globally competitive knowledge and research clusters
- Major sporting venues such as Royal Randwick Racecourse and the nearby Sydney Cricket Ground
- Proximity and gateway to key cultural and tourism destinations including Coogee, Clovelly and Maroubra.

The draft Sydney Plan provides minimal direction on the transport and public realm improvements needed to support a high-intensity innovation and health precinct like Randwick. Transport planning must reflect the true scale of trip generation (including visitors) associated with these assets.

Concerns are raised that the under estimation of Randwick's regional role would lead to underinvestment in high capacity public transport, insufficient cross-regional connections and inadequate active transport corridors linking to neighbouring LGAs.

Recommendation:

- Align transport planning with the scale and function of major employment centres such as the Randwick Health and Education Precinct;
- Incorporate strategies, governance framework and employment guidance/jobs growth for knowledge-economy precincts such as Randwick; and
- Recognise significant housing affordability pressures due to high rents and limited supply needed to support productivity within the precinct.

Active Transport

The draft Sydney Plan's emphasis on improving active transport networks is strongly supported. However, greater recognition is needed of the topographical and environmental conditions (such as steep gradients, narrow road reserves, heritage streetscapes and coastal environments) which require tailored, place-based solutions and dedicated funding to deliver safe, accessible and connected walking and cycling routes.

Randwick City experiences some of the highest pedestrian and cycling demand in metropolitan Sydney, driven by the Randwick Health and Education Precinct, UNSW, major sporting venues and the region's popular beaches. Despite this, the active transport network remains fragmented, with limited east-west and north-south continuity, pinch points around key centres and constrained corridors where road space competition is acute. These gaps reduce safety, limit mode shift and place additional pressure on already congested public transport routes.

The draft Plan also does not identify or prioritise the regional active transport links essential for sustainable access to major destinations. Critical missing connections include safe cycling and pedestrian routes between Randwick and the CBD, Bondi Junction, Green Square, Port Botany and neighbouring LGAs. Without a clear commitment to delivering these strategic corridors, the potential for active transport to reduce congestion, support health outcomes and improve access to employment and education will not be realised.

A more detailed and committed approach to active transport is essential to improving mobility, reducing congestion, supporting health and environmental outcomes and ensuring that growth in Randwick City is sustainable and supported by appropriate infrastructure.

Recommendations:

- Identify and prioritise regional active transport corridors linking Randwick to the CBD, Bondi Junction, Green Square, Port Botany and surrounding LGAs
- Commit to funding and delivering continuous, legible, safe and accessible walking and cycling routes to and through major trip generators, including the Randwick Health and Education Precinct, UNSW, town centres and coastal destinations
- Recognise the physical and spatial constraints within Randwick City and provide flexibility and support for innovative, place-based active transport solutions; and
- Ensure active transport planning is integrated with mass transit, bus network improvements and land use decisions including State-led rezonings to maximise mode shift and reduce reliance on private vehicles.

7. Liveability

Social Infrastructure, Cultural and Creative Assets

The draft Sydney Plan provides a high level vision for housing, jobs, infrastructure and sustainability however it does not explicitly address social infrastructure, arts and cultural infrastructure, despite their critical role in shaping liveable, equitable and resilient communities. This omission represents a significant gap in the proposed regional planning framework and risks undermining the Plan's ability to deliver on its stated goals for liveability, equity and community well being.

Randwick City is home to a diverse range of social infrastructure and cultural assets, including childcare centres, galleries, performance spaces, and community cultural venues. These facilities contribute to a vibrant local cultural economy and support the broader district by providing accessible, community scaled cultural infrastructure outside the CBD and harbour precincts.

With population growth and demographic change, there will be a strong need for investment in social infrastructure, cultural and creative industries to broaden participation and serve local needs. To achieve this, the draft Sydney Plan should incorporate higher overarching commitments towards delivering social infrastructure and creative/cultural venues focusing on equitable access and to facilitate greater diversity, resilience, inclusivity and community cohesion,

Recommendations:

- Incorporate arts, cultural and social infrastructure as key priorities in the regional planning framework including policy direction and measurable outcomes

- Embed social infrastructure and creative/cultural use infrastructure planning as an action for major renewal and uplift areas, supported by appropriate planning controls and funding mechanisms.

8. Sustainability and Resilience

Council recognises the critical importance of embedding sustainability and resilience within the broader vision for Greater Sydney. While the draft Plan articulates high level intentions in this space, greater clarity and commitment are required to ensure the draft Plan delivers measurable improvements to environmental performance, climate preparedness and long-term urban liveability.

The draft Plan currently lacks the detailed strategies, actions and implementation mechanisms needed to operationalise its sustainability ambitions. Key areas such as resilience planning, circular economy principles, zero emission buildings and electrification are referenced only at a broad level. These elements must be explicitly embedded within the Plan and supported by clear standards and guidance to enable councils to implement them consistently and effectively.

The absence of measurable sustainability targets represents a significant gap. Targets for tree canopy expansion, carbon reduction, water efficiency, heat mitigation and other critical indicators are essential to drive accountability, monitor progress and ensure alignment with State and national commitments. Without these, the Plan risks remaining aspirational rather than actionable. A stronger, more detailed and measurable sustainability framework is required to safeguard the region's future and ensure that growth is both responsible and resilient.

Recommendations:

- Incorporate explicit policy directions on climate resilience, circular economy principles, zero-emission buildings and electrification;
- Provide clear implementation pathways and standards to guide councils and industry;
- Require councils and agencies to integrate climate-risk considerations into land-use planning, infrastructure delivery and precinct planning;
- Develop consistent sustainability standards for precinct planning, building performance, green infrastructure and circular economy outcomes;
- Provide technical guidance and tools to support implementation at the local level; and
- Establish a transparent monitoring framework with regular public reporting on sustainability and resilience indicators.

Draft Industrial Lands Policy

Comments

Randwick City Council supports the NSW Government's intent to provide a consistent and transparent statewide framework for managing and protecting industrial lands. The designation of all industrial areas within Randwick as Regionally Significant Industrial Lands (RSILs) appropriately reflects their continued strategic importance for freight, logistics, light manufacturing, and essential local services, particularly given their proximity to Port Botany. This classification ensures long-term protection of lands that play a vital economic role in Greater Sydney.

Council acknowledges the State's policy direction toward intensification of RSILs, through increased heights, higher floor space ratios, multistorey industrial forms, and streamlined approvals, rather than transitioning industrial lands to non-industrial uses. However, Council emphasises that intensification must be supported by suitable planning controls that address potential impacts on surrounding communities and adjacent residential areas. This includes managing issues such as overshadowing of multistorey industrial buildings on adjacent residential areas, noise impacts of 24/7 operations, heavy-vehicle movements on local roads, landscaping requirements to reduce the bulk and scale of multi storey development impacts on streetscapes, and the operational/compliance challenges of multi tenancy industrial buildings. Given these issues, precinct-based planning and site-specific design

responses will be essential to avoid shifting the burdens of intensification onto interface residential areas and local neighbourhoods.

While Council supports maintaining industrial capacity, it also highlights that worker-servicing land uses, such as food and drink premises, small-scale retail, and recreation facilities are fundamental to the functioning of modern industrial precincts.

The long-term viability of industrial lands also depends on ensuring adequate services and facilities for the workers who support these precincts. Over recent decades, many traditional worker-servicing amenities such as truck stops, rest areas, food outlets, and small-scale convenience services—have been progressively lost due to the rezoning of industrial areas for residential development. As these support services disappear, industrial precincts become less functional.

The current E4 General Industrial zoning prohibits as food and drink premises, small scale retail, and recreation uses, creating inconsistency between the State's policy objectives and practical application. Council therefore recommends greater flexibility be provided to allow small-scale, compatible support uses within RSILs, similar to provisions already permitted in Port Botany's IN1 zone. This will help ensure that industrial precincts remain functional, resilient, and aligned with the broader strategic vision for Greater Sydney and reduce industrial worker demand on Council's parks and recreational areas.

Conclusion:

Thank you for the opportunity to comment on the proposed new strategic planning framework for the Sydney Metropolitan Region. As outlined throughout this submission, the new strategic planning framework for Metropolitan Sydney must move beyond high level aspirations and provide clear, detailed and actionable directions in relation to housing delivery and affordability, infrastructure funding and delivery commitments, heritage protection and environmental sustainability.

Council remains committed to working collaboratively with the State Government to refine the Plan to ensure it delivers a sustainable, equitable and resilient future for all communities across Metropolitan Sydney. A more robust and measurable framework, supported by defined and realistic planning priorities would be essential to guiding councils, industry and government agencies in delivering consistent and high quality outcomes.

If you would like to discuss the issues raised in this submission, please contact Stella Agagiotis, Manager Strategic Planning on telephone 9093 6954.



Meryl Bishop
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