

ATTACHMENT A

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**DRAFT SUBMISSION ON  
*SYDNEY CITY DRAFT  
SUBREGIONAL STRATEGY***

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## **SYDNEY CITY DRAFT SUBREGIONAL STRATEGY – JULY 2008**

### **A submission from the Council of the City of Sydney August 2008**

#### **Overview**

The City of Sydney welcomes the opportunity to provide a submission on the Sydney City Draft Subregional Strategy (SCDSS) which was released for public comment on 2 July 2008.

The City of Sydney generally supports the SCDSS's key directions and actions, and commends the Department of Planning for developing a framework for the long term development of the local government area. The City envisages that the SCDSS will complement the Sustainable Sydney 2030 (SS2030) vision which was recently adopted by Council, as well as inform the preparation of the city's new Principal LEP (the CityPlan). The City is committed to future cooperation and partnership with the State Government to achieve many of the key actions in both the SCDSS and SS2030.

The City recognises the SCDSS as a key strategic document providing long term and integrated responses to urban growth and change in the City of Sydney, as well as highlighting many of the important linkages between local and state planning issues. The City of Sydney LGA is a highly significant subregion, particularly due of its important role in meeting housing and employment targets, and in providing for physical, social, economic and cultural development. Similar to SCDSS, SS2030 recognises this role and sets key directions and actions to deliver a sustainable future for the LGA for the next 20 years and beyond, addressing a similar range of land use, and broad economic, community and environmental issues. However, SS2030 has a broader ambit than the SCDSS and there are a number of areas discussed in this submission where the SCDSS falls short of the SS2030 vision.

The Department of Planning is urged to consider the matters raised in this submission in the finalisation of the SCDSS in order to provide both the City and the State Government with an even stronger platform upon which to plan for the future of the City of Sydney LGA and the Sydney Region in general.

#### **Structure of this submission**

The submission is structured around each of the seven Key Directions (A to E) laid out in the SCDSS. For each of the seven key directions the responses include the following components:

1. Key Issues
2. Comments on Background, Maps and Figures
3. Comments on Actions in a table format

## A. ECONOMY AND EMPLOYMENT

### 1. Key Issues

#### *Employment Land*

The SCDSS currently identifies no employment land as warranting investigation for alternative uses. Though not strictly referring to “employment land”, SS2030 identifies opportunities for redevelopment of land currently occupied by the Western Distributor, Darling Harbour Sydney Convention and Exhibition Centre, the Sydney Entertainment Centre and the air rights above Central Station. This land currently accommodates uses and functions that constrain the economic development of Sydney and it is considered that the sites have potential for employment or some equivalent economic benefit.

The SCDSS should acknowledge these opportunities for new shared, intensified and complementary uses.

#### *Employment targets*

For the City, and the Green Square Urban Renewal Area in particular, residential targets are proving more difficult to achieve than the employment target, and therefore some emphasis has been placed on accommodating dwelling numbers in the Green Square Town Centre. The SCDSS places greater emphasis on the centre’s ability to achieve employment targets, which is not complementary to the longstanding vision for Green Square as a vibrant mixed-use community and cultural hub.

### 2. Comments on Background, Maps and Figures

#### *Figure 9 Existing Employment zones (pp.24-25)*

Alexandria industrial use lands include a key for office/business parks. Office/business parks are proposed to be restricted under a tightened Industrial zoning.

The Green Square area is shown as primarily consisting of a Mixed Uses zone, indicating it is an employment zone. The Mixed Uses 10(a) and 10(b) zones are predominantly residential zones with a very small component of employment. Employment should only refer to existing 10(c), 10(d) and 10(e) Mixed Use zones.

### **Category 1 – Land To Be Retained For Industrial Purposes (p.29)**

The SCDSS does not appear to categorise two sites identified to be existing employment land: Junction Street, Forest Lodge and 1 Lower Avon Street, Glebe.

It is recommended that the two sites fall under Category 2 for the following reasons

- 1 Lower Avon Street, Glebe (700m<sup>2</sup>) has approved and constructed residential live work apartments. The site is situated on a narrow cul-de-sac framed by the light rail and a cliff. It is unlikely that traditional industrial would be appropriate in this location. It is considered to be more appropriately zoned Mixed Use which would maintain the employment use that is currently permitted on the site.
- Junction Street, Forest Lodge (0.5ha) contains a commercial building for printing and construction services, a shed for ancillary storage and workspace and a car park. Access is not ideal for traditional industrial uses but may be able to cater for urban support services. However any support services should not compete with the nearby St Johns Street centre.

The retention of an employment use could enable start-up businesses beyond home industries. The concern of zoning employment land as Mixed Use can be guided by DCP provisions to identify areas that are to retain a primary employment function, consistent with the SCDSS.

Any proposed rezoning would be discussed with the Department and detail reports will be forwarded in due course.

### **Table 4 (p.29)**

Consideration is still being given to the proposed zoning of several parcels of land that are currently zoned industrial under Leichhardt LEP 2000.

### **Existing Employment Lands in Sydney City (p.30)**

Refers to classification as employment land for sites in mixed uses area south of Epsom Road. Figure 9 map does not reflect this as it is marked for mixed uses. An appropriate key should represent these lands.

### **Enterprise Corridor (p.32)**

No Enterprise Corridors identified in Sydney City Subregion. However, mention should be made of how the subregion relates to the Enterprise Corridor on south side of Gardeners Road along southern boundary of LGA, identified in the East SCDSS.

**Business Development Zones (p.33)**

The SCDSS states that no Business Development zones have been identified for the City. However there may be opportunities for this zone within the Green Square redevelopment area.

A Business Development zone may also be appropriate for parts of Ultimo-Pymont given that it also aims to encourage employment uses which can support the CBD.

**Figure 10 Existing Industry concentrations**

It is unclear if 'existing industry concentrations' indicates what we are seeking to retain in the employment lands; if so, retail and business uses are not desirable uses in the industrial zones.

The Employment Lands key should reflect employment lands in Green Square, rather than just industrially zoned land. Some of these lands are located in the existing Green Square Mixed Uses Zones.

There is an opportunity to list Danks Street, Waterloo as a Cultural/Recreation precinct.

**3. Comments on Actions**

Action Ref.	Action	Response
A1	<i>Provide suitable commercial sites and employment lands in strategic areas.</i>	<p>The SCDSS currently identifies no employment land as warranting investigation for alternative uses. The SCDSS should acknowledge opportunities for new shared, intensified and complementary uses.</p> <p>Though not strictly referring to "employment land", Sustainable Sydney 2030 (SS2030) identifies opportunities for redevelopment of land currently occupied by the Western Distributor, Darling Harbour Sydney Convention and Exhibition Centre (SCEC), the Sydney Entertainment Centre (SEC) and the air rights above Central Station. In doing so, the motivation is to consider these sites as having increased potential for employment or some equivalent economic benefit.</p> <p>All of this land accommodates uses and functions that constrain the economic development of Sydney for the following reasons:</p>

Action Ref.	Action	Response
		<ul style="list-style-type: none"> <li>• SCEC is nearing the end of its designed life and the existing facilities no longer match either the operational demands satisfied by competitive facilities within Australia and abroad. Further, the facilities are no longer large enough. In addition, the facilities provide a venue for activities that generate no profit, though they do generate an economic benefit to the State. Finally, the facilities are housed in a building that is essentially an inward-looking single storey shed above a car park adjacent to precincts that are close to the Darling Harbour and its parks and that typically comprise 10 storey commercial and residential developments;</li> <li>• SEC is widely acknowledged as having a maximum residual life span of 10 years;</li> <li>• Development around and above Central Station and its yards, the premier rail hub in New South Wales, does not match the intensified patterns and mix of complementary uses now expected of, and being delivered around, lesser transport nodes such as Chatswood, St Leonards, North Sydney and other locations along the Global Arc. These nodes are recognised in the Metropolitan Strategy as warranting higher intensity development above and surrounding them. Central Station is well connected to the Sydney CBD, the airport and Sydney Olympic Park – all three of which are significant economic infrastructure elements;</li> <li>• The imminent closure of cash toll lanes in the southern approaches to the Sydney Harbour Bridge will render redundant much of the road reserve land in a part of the city widely regarded as having the highest development potential and value in the nation;</li> <li>• The Western Distributor aerial decks limit development around the “Western Corridor” and Darling Harbour and the connection of these precincts to the CBD. Further, this road network serves to inject ever increasing surface vehicle traffic volumes into the CBD, contributing thereby to economic losses arising from congestion.</li> </ul> <p>Considerable benefit might be achieved if the location of different uses between and within each of these precincts is investigated.</p>
A1.1	Provide a framework for accommodating jobs across the Subregion.	Planned major centre of Green Square is expected to accommodate a total of 14,000 jobs in 2031, yet in other parts of the SCDSS a minimum of 8000 new jobs is identified.

Action Ref.	Action	Response
SC A1.1.1	The City of Sydney Council to prepare a Principal LEP which will provide sufficient zoned and serviced land to meet the employment capacity target.	Subject to ongoing discussions with the Department of Planning.
SC A1.1.2	The City of Sydney Council, with support of Department of Planning and Department of State and Regional Development, to develop and implement an Economic Development Strategy for the subregion.	Economic Development Strategy and Action Plan to be prepared by the City of Sydney.
SC A1.2.1	The City of Sydney Council to review the balance of mixed-use zones at Green Square, including measures to address pressure to rezone predominantly Employment Land to residential areas.	This review was finalised at the end of 2006. Further refinements to the zoning approach have been undertaken by the City in consultation with the Department of Planning, and this work has progressed through the City Plan Working Group into the proposed Green Square planning controls.
SC A1.4.1	The Department of Planning to undertake a metropolitan and subregional review of Employment Lands, prior to considering any significant rezoning of Employment Land to non-employment uses within the Sydney City Subregion.	The SCDSS identifies 5 Employment Land areas in City including Alexandria and Rosebery, and mentions further assessment is to be done by the City in preparing the Principal LEP. It is unclear as to what is expected of the City in doing this assessment, whether the Department of Planning will undertake further work, and the timing of this work given the City Plan current timeframe.
SC A1.5.1	The Department of Planning to investigate measures to protect and enhance State Significant Employment Lands.	The action states consideration of the Employment Lands SEPP is needed to ensure protection of State Significant Employment Lands (as identified in <i>Employment Lands for Sydney Action Plan</i> ). Concern is raised regarding the timing of this SEPP given the work the City has already undertaken for the City Plan and the City Plan time frame, and the extent to which the SEPP will be consistent with the proposed zonings and controls progressed with the Department of Planning for the City Plan.

Action Ref.	Action	Response
SC A1.5.2	The City of Sydney Council to identify means for the appropriate protection of Employment Lands within the subregion through: Review of Southern Industrial Lands Review of mixed use zonings at Green Square Containing the expansion of bulky goods retail in Alexandria and Rosebery.	The reviews have been completed, and the work which has been integrated into the City Plan is consistent with the action. The action should be updated to refer to the City Plan.
SC A1.7.1	Establishment of an Employment Lands Development Program, in parallel with the Metropolitan Development Program and under a Sydney Land Supply program, will allow supply and uptake of Employment Lands in the Sydney City Subregion to be monitored.	Establishment of Employment Lands Development Program with involvement of Employment Lands Ministerial Advisory Committee, details for which are in the Action Plan. There is no mention as to how findings (after Action Plan release) will be provided to the City or what the function of committee/program is.
SC A1.9.1	The City of Sydney Council to explore opportunities to revitalise strategic Employment Lands.	Further intensification of Employment Lands (through development of “industrial parks”) may be considered where it will not undermine existing industrial areas. Industrial land use zones and Standard Instrument LEP as proposed in the City Plan don’t make provisions for restricting small industrial units to support this. Industrial uses permitted can be of any size.
SC A3.1.1	The Department of Planning and Department of Education and Training to prepare guidelines for agencies and local government to decide when and how skills development components can be incorporated in major redevelopment projects.	This action requires the City to investigate such strategies in reviewing planning controls. The requirements and implications of this action for the City Plan and its timeframe are unclear, particularly in relation to Green Square Major Centre.
SC A3.3.1	Council to investigate strategies to ensure sufficient provision of comparatively low cost premises for start-up businesses when reviewing their existing planning controls.	There is no mention as to what mechanisms could be used, how to ensure they are low-cost or how this relates to the identified employment lands.

## B. CENTRES AND CORRIDORS

### 1. Key Issues

#### *Green Square Planned Major Centre*

The extent of the 'Planned Major Centre' was not made clear before the release of the SCDSS. The need to establish another separately defined area for the major centre is strongly questioned, particularly in defining appropriate jobs and dwelling targets and fitting the 'definition' of major centres. Employment and residential targets for Green Square should refer to the entire Green Square Urban Renewal Area in providing direction for establishing an appropriate balance between employment and living areas and the resulting zonings and density controls. The additional 'Planned Major Centre' boundary creates confusion, particularly in discussing targets and the strategies/actions identified in the SCDSS that refer to the 'Planned Major Centre'.

The Planned Major Centre target for 14,000 jobs by 2031 is considered artificially high given the Town Centre will be the only focus of substantial employment. The rest of the Planned Major Centre area covers the areas that are or are proposed to become predominantly residential, with very limited jobs envisaged.

It is recommended that the Planned Major Centre boundary be deleted and either the term used to describe the wider Green Square Urban Renewal Area or the Green Square Town Centre.

#### *Centres Map correlation with Sustainable Sydney 2030 activity hubs*

It is questioned whether the level of detail in this map is necessary given that the future role of local centres is to be determined by local government over the life of the SCDSS. Essentially SS2030 has two tiers (activity hubs and villages), whereas the SCDSS has a total of more than 60 centres and up to 6 tiers with lower levels sometimes (more so in other sub-regions) containing a single corner shop. It is recommended that the Centres Map is reviewed to be better aligned with SS2030 activity hubs.

### 2. Comments on Background, Maps and Figures

#### *Figure 11 Centres in the Sydney City Subregion (p.48)*

It is somewhat unclear if the Centres Map presents a desired future outcome, or the existing situation. The centres generally seem to correlate with some existing retail development, but do not reflect commenced retail development, or a strategic consideration of where centres would best be located to create communities and make the most of infrastructure investments.

The Centres Map fails to reflect the hierarchy of retail centres recommended by the *Green Square and Southern Areas Retail Study*, which was undertaken by the City in 2007 and was recently placed on public exhibition. The hierarchy presented in the Retail Study has been reported to Council and CSPC, endorsed, and will inform the City Plan LEP and DCP. It should be noted that the Retail Study and City Plan will utilise the Metropolitan Strategy's centres typology, which is consistent with the Centres Map, and therefore allows for comparison and discussion

The main differences between the SCDSS's proposed centres and the City's preferred hierarchy are:

- The Retail Study recommends the existing retail uses in Danks Street and Crown Square (former ACI site), Waterloo be encouraged to evolve as a combined Village Centre. An approved supermarket within Crown Square will be the centre of this village. Construction of this supermarket has commenced.
- An approved supermarket as part of an 8,000sqm retail development will form another Village Centre within Victoria Park (near the corner of South Dowling Street and O'Dea Avenue). An approved food market and public square slightly west of this site will also operate as part of this Village Centre. The food market is under construction and the supermarket development is expected to commence shortly. The Retail Study found that these two Village Centres are supportable, even in relatively close proximity to the Green Square planned major centre, as they will meet a more local retail demand.
- The Retail Study did not identify the Victoria Park Neighbourhood Centre shown in the Centres Map.
- The City has identified the site of the existing IGA supermarket on Botany Road, Rosebery as a future Small Village, as a larger supermarket will be supportable here in the future, and it is a good location to serve a worker and residential retail demand. This Small Village is possibly the location of the Neighbourhood Centre identified as 'Beaconsfield' in the Centres Map. This centre should be changed to allow for a Small Village in this location, to ensure future retail demand can be met.
- A Neighbourhood Centre may also be identified at the site of the South Sydney Corporate Park on O'Riordan Street, however this is subject to further investigations, and it is not recommended for inclusion in the Centre Map at this stage.

Given the research the City has undertaken to identify the above preferred hierarchy of retail centres, and that the Department of Planning (through the City Plan Working Group) has in principle supported this hierarchy, the above directions should be incorporated in the SCDSS. The Centres Map should also be clearly identified as a strategic map (rather than existing conditions), with the intent to encourage the orderly future development of retail centres in the southern areas.

No Specialised Centres have been identified in the Centres Map. Because the south is largely a renewal area, it would seem that there would be opportunity to identify future specialised centres, particularly in the identified future industrial areas in the Southern Industrial Area and Green Square, and given the area's proximity to important infrastructure such as the port, the airport and the CBD.

The area intended for bulky goods development along O'Riordan Street as proposed in the City Plan should be identified in the Centres Map, recognising its existence and where the concentration of bulky goods retailing is to occur.

The Centres Map also identifies 'strategic bus corridors' in the key, but does not appear to show these routes on the map.

The North West Metro corridor connecting to the CBD is not identified on the map key.

The hat marker identifying education facilities is not marked on the key.

The classification of Ashmore as a 'Neighbourhood centre' is questioned. It is envisaged it will have a full-line supermarket and associated retail services, and therefore should be a 'Small Village'.

**Figure 24 and Planned Major Centre – Green Square (p.64)**

Figure 24 in this section shows the Green Square Urban Renewal Area (which is consistent with the City's documents), the Green Square Town Centre (which is consistent with the City's documents) and the 'Planned Major Centre' boundary, which is drawn along the line of the two census collection districts in the north-eastern section of Green Square. This area includes the Town Centre, Victoria Park, Crown Square and other major residential sites.

The extent of the 'Planned Major Centre' has not been made clear before. It is strongly questioned the need to establish another separately defined area for the major centre, particularly in defining appropriate jobs and dwelling targets and fitting the 'definition' of major centres.

Employment and residential targets for Green Square should refer to the entire Green Square Urban Renewal Area in providing direction for establishing an appropriate balance between employment and living areas and the resulting zonings and density controls. The additional 'Planned Major Centre' boundary creates confusion, particularly in discussing targets and the strategies/actions identified in the SCDSS that refer to the 'Planned Major Centre', eg. are these strategies/actions not applicable to the rest of the Urban Renewal Area?

The Planned Major Centre target for 14,000 jobs by 2031 is considered artificially high given the Town Centre will be the only focus of substantial employment. The rest of the Planned Major Centre area covers the areas that are or are proposed to become predominantly residential, with very limited jobs envisaged.

It is therefore considered the Planned Major Centre boundary be deleted and either the term used to describe the wider Green Square Urban Renewal Area or the Green Square Town Centre.

Also, in the text on Page 64, Rosebery should be added to the list of suburbs comprising the Green Square area.

**Figure 25 and Green Square Town Centre Snapshot (p.65)**

It is unclear whether this plan identifies existing conditions. It would be more useful (and achieve better consistency with the City's work) if it presented a desired future scenario.

It is recommended that the following amendments are made:

- The Town Centre should not be identified as an entirely commercial development area. At best, the proposed predominantly residential, commercial and open areas within the Town Centre could be identified as such; otherwise the entire area should be identified for mixed uses.
- Areas within the other mixed use areas are often primarily residential, commercial and industrial. It would be more useful to show some of these land use patterns on this map, consistent with the City Plan work.
- Some existing open spaces are not identified on this map – for example Joynton Park, Victoria Park and Crown parks in Crown Square. These are built parks owned by Council land, and should therefore be identified.
- Taylors College should also be identified as an educational establishment at 965 Bourke Street, Waterloo.
- The identification of the Moore Park Supa Centre as the only retail development in the area unnecessarily elevates the site's significance, relative to Green Square.
- The figures in the snapshot table should be deleted to show a) figures for the whole urban renewal area (not just the major centre area) and b) updated with 2006 census data.
- As a strategic plan, Figure 25 should identify the proposed surface transport corridor along the eastern part of Green Square (Defries/Gadigal Avenue) and the East-West Boulevard.

### 3. Comments on Actions

Action Ref.	Action	Response
B1.1	Establish a typology of centres.	<p>It is questioned whether the methodology in the SCDSS is necessary given that the future role of local centres is to be determined by local government over the life of the SCDSS. Essentially SS2030 has two tiers (activity hubs and villages), whereas the SCDSS has a total of more than 60 centres and up to 6 tiers with lower levels sometimes (more so in other sub-regions) containing a single corner shop.</p> <p>SS2030 identifies 10 activity hubs (planned and existing) throughout the LGA/sub-region that accommodate between 15 000 and 25 000 people and each contain a number of 'villages'. These would be positioned somewhere between 'major centre' and 'town centre' in the SCDSS. SS2030 recognises that hubs may have a speciality or industry focus however hasn't used large anchor sites (such as universities, hospitals, etc) to identify the hubs. Villages in SS2030 accommodate 5000 to 10 000 people with walk-ability to essential shops and services, broadly corresponding with the characteristics of the SCDSS 'town centres'. It is recommended that the Centres Map is reviewed to be better aligned with SS2030 activity hubs.</p>

Action Ref.	Action	Response
SC B1.1.1	State agencies and City of Sydney Council incorporate the established centre typology into their land use and infrastructure planning and Council's Principal LEP.	The work undertaken for the <i>Green Square and Southern Areas Retail Study</i> provides an alternative hierarchy of retail centres that have been demonstrated to better serve the population. This alternative hierarchy has been discussed in the City Plan Working Group sessions, has been endorsed in principle by Council and CSPC and has been translated into City Plan controls.
SC B1.2.1	The City of Sydney Council to incorporate employment capacity targets in their Principal LEP and State Agencies to use these targets as a basis of their planning work.	It is not considered appropriate that these targets be located in the City Plan LEP, particularly when considering the City Plan timeframe (about 5 to 10 years). They are better placed in the overarching <i>Strategic Framework and Structure Plan</i> document the City is preparing. The objective to meet these targets has formed the resulting controls in the LEP.
B2.1	Plan for housing in centres consistent with their employment role.	For the City, and Green Square in particular, the residential targets are proving more difficult to achieve than the employment target, and therefore some emphasis has been placed on accommodating dwelling numbers in the Town Centre. The SCDSS places greater emphasis on the centre's ability to achieve employment targets, which is not complementary to the longstanding vision for Green Square as a vibrant mixed-use community and cultural hub. The proposed location of employment concentration is on the western part in the Town Centre, complemented with the adjacent areas which are outside the 'Planned Major Centre' boundary, but within the Urban Renewal Area.  The important role of residential development in these locations in creating a vibrant community should not be underestimated, and should not be a secondary objective for the planned major centre.  Subject to ongoing discussions with the Department of Planning.
SC B2.1.1	The City of Sydney Council to review planning controls for residential development within Central Sydney as part of its Principal LEP whilst ensuring potential capacity for future employment growth.	
SC B2.1.2	The City of Sydney Council to review mixed-use zones for residential development around Green Square.	The <i>Mixed Use Zones Review</i> was undertaken for this specific purpose, and completed late in 2006. The recommendations of this review have been considered together with other City Plan reviews and studies and have been progressed into City Plan controls. This work was reported to Council and the CSPC in July 2008 as part of the <i>Green Square Background Paper</i> , along with specific parts of the proposed City Plan LEP controls.

Action Ref.	Action	Response
		<p>Generally, the Review finds that the land use mix required by the various existing mixed use zones was not being achieved, and that the trend was for dominant residential development. The Review recommends the mixed use zone be removed from some areas and replaced with a more appropriate zone that reflects the predominant or desired land use – ie. residential, commercial, retail or industrial land uses.</p> <p>Also, proposed zones and land use tables for the Green Square Urban Renewal Area presented at the City Plan working Group Meeting No. 7 (28 May 2008) support the following statement: “Areas which have been identified as in transition from industrial to residential uses have also been proposed as mixed uses in order to allow appropriate existing uses to continue in the short term whilst enabling the transformation to more residential land uses.”</p> <p>The above quoted statement will be inconsistent with the SCDSS objective to halt further transition of industrial (employment) land into residential.</p>
SC B3.4.1	<p>The City of Sydney Council and NSW Government to investigate opportunities to increase capacity for further commercial floorspace in Sydney CBD to meet future demand as part of the Principal LEP, which may include investigating the use of a commercial core zone within the City Centre.</p>	<p>The planning controls for City Plan will address opportunities to provide additional capacity within Central Sydney by encouraging the efficient use of existing land. Where particular planning outcomes are sought for a site or area, an approach similar to the existing "Opportunity Sites" controls under Sydney LEP 2005 is being investigated.</p> <p>The Council will continue to work in partnership with the NSW Government in relation to providing sufficient capacity for future demands and recognising that blanket changes to planning controls, such as simply increasing floor space ratios, are counter-productive unless the benefits of such changes are accessible to all potentially developable sites.</p>
B4.1	<p>Concentrate retail activity centres, business development zones and enterprise corridors.</p>	<p>With regard to bulky goods development, the <i>Green Square and Southern Areas Retail Study</i> found that a great deal of the existing bulky goods resides on O'Riordan Street (in the Southern Industrial Area), and that this location should be identified as the future location for concentration of bulky goods development. This intent is reflected in the proposed City Plan zoning controls. This strategic direction for bulky goods retailing should be recognised in the SCDSS.</p>
SC B4.1.2	<p>The City of Sydney Council to investigate appropriate locations for retail uses in Strategic Centres, Business Development Zones (supporting identified Strategic Centres) and Enterprise Corridors.</p>	<p>The City commissioned the <i>Green Square and Southern Areas Retail Study</i> which recommends a retail hierarchy for Green Square, the Southern Industrial Area and the remainder of Rosebery. These recommendations will be reflected in the zoning and other planning controls in the City Plan LEP and DCP.</p>

Action Ref.	Action	Response
		<p>The SCDSS describes the Business Development Zone as an appropriate location for bulky goods developments; however this intent was not expressed in the Standard LEP Template land use definitions. As such, the zone has been interpreted as an appropriate land use zone for business support services, and this will be reflected in the objectives for the zone in City Plan. The Business Development Zone is proposed for an area west of the Green Square Town Centre; however it is not intended to explicitly encourage bulky goods development in this location.</p> <p>The SCDSS should reflect the intended use of the Business Development Zone in Green Square. This proposed zoning has received in principle support from the representatives of the Department of Planning on both the CSPC and the City Plan Working Group.</p>
SC B4.1.3	The Department of Planning to prepare guidelines for the application of Business Development and Enterprise Corridor zones.	Ahead of this information, the City intends to use the Business Development Zone west of the Green Square Town Centre.
B7.1	Create a zone recognising the role of enterprise corridors.	<p>Some feedback on the progress of this information, or any directions that will be contained in the information should be provided to the City to inform the formulation of the City Plan LEP in consultation with the Department of Planning.</p> <p>This statement is inconsistent with what was reported in the East SCDSS. An enterprise corridor is recommended for the land south of Gardeners Road in the Botany Council area, and we have advice from the Council that they wish to proceed with this recommendation.</p> <p>According to the SCDSS, the recommendation is to only zone the southern side of Gardeners Road for Enterprise Corridor uses. This may defeat the purpose of the zone as it would fail to create a corridor.</p> <p>The City does not support an Enterprise Corridor in this location, as the proposed City Plan controls retain industrial uses along Gardeners Road.</p> <p>Note: The photo titled 'Alexandria' is showing Elizabeth Street in Waterloo.</p>

## C. HOUSING

### 1. Key Issues

#### *Residential targets*

The City is confident of reaching the Metropolitan Strategy residential target by 2031. Preliminary analysis undertaken for SS2030 suggests that by 2030 the City will have a total of around 138,000 dwellings including non-private accommodation such as boarding houses, nurses' quarters and student accommodation. However, detailed capacity analysis is still required to validate this estimate. The *City Plan 2008* is intended to provide for 10 to 15 years of development growth and ensure future development potential is preserved.

#### *Affordable Housing*

Despite its commitment to action regarding affordable housing in the Sydney Metropolitan Strategy to '*Prepare an initial NSW Affordable Housing Strategy by mid 2006*' which will include but not be limited to '*making better use of planning laws and regulations to encourage the growth of affordable housing stock*', the Department of Planning has failed to provide guidance to local government on how they may facilitate affordable housing through planning instruments, nor does the Standard LEP Instrument include provisions relating to affordable housing.

The City recommends the SCDSS include actions towards exploring new and innovative approaches to protect existing affordable housing stock. This may include, but not be limited to improving existing planning mechanisms and real incentives for owners of existing low cost accommodation to retain it as such.

### 2. Comments on Background, Maps and Figures

#### *Housing Character and Choice (p.76)*

The statement regarding the City's wide range of dwelling types is misleading in that the City contains a high proportion of small apartments.

#### *Figure 26 – Existing housing Density in the Sydney City Subregion (pg. 77)*

The map shows highest density of 25+ dwellings per hectare in Sydney City subregion. The way the information on residential density is presented is ambiguous. It can be interpreted as though the whole of the area is having low residential concentration. The glossary of terms describes medium housing density generally between 25-60 dwellings per hectare and not usually more than three or four storeys in height ( examples are town houses and terrace housing), while high density is over 60 dwellings per hectare and generally five storeys or more high, for example apartment buildings.

**Major development/Renewal Sites (p.78)**

The Ashmore Precinct is not mentioned. This is a 17 ha urban renewal area in Erskineville, with approximately 4ha already redeveloped from light industrial uses, to residential. This precinct has not been mentioned as an urban renewal area throughout the document, but should be included in the same context as Barangaroo, the Carlton United Breweries site and Green Square.

**3. Comments on Actions**

Action Ref.	Action	Response
SC C1.3.1	City of Sydney Council to plan for sufficient zoned land to accommodate their local government area housing targets through their Principal LEP.	<p>It is noted that in preparing its Principal LEP the City will “need to demonstrate that there is sufficient zoned capacity to meet the 10 year dwelling targets (to 2013) and that the longer term targets to 2031 will be achieved”.</p> <p>The City is confident of reaching the Metropolitan Strategy residential target by 2031. Preliminary analysis undertaken for SS2030 suggests that by 2030 the City will have a total of around 138,000 dwellings including non-private accommodation such as boarding houses, nurses’ quarters and student accommodation. However, detailed capacity analysis is required to validate this estimate.</p> <p>The <i>City Plan 2008</i> is intended to provide for 10 to 15 years of development growth and ensure future development potential is preserved. Some of the City’s longer-term planning initiatives, such as the projects proposed in SS2030, cannot be reflected in the City Plan as they are contingent on issues that are yet to be resolved.</p>
SC C1.4.1	The Department of Planning to provide councils with information that will assist with the preparation of Principal LEPs.	<p>With regard to the pending Employment Lands Development Program, the City has undertaken research regarding the retention of employment lands in the Southern Industrial Area and in Green Square. This is reflected in the general intention to retain the industrial zone where it exists, but also to introduce new industrial zoning for existing mixed use zones that are primarily industrial in nature.</p> <p>These zoning proposals have been discussed and shared with the Department of Planning leading up to draft City Plan provisions. It is expected that the Development Program will reflect much of these developed strategies.</p>

Action Ref.	Action	Response
SC C1.4.2	Council to review and monitor the outcomes of mixed use zonings for the Green Square Urban Renewal Area.	<p>The <i>Mixed Use Zones Review</i> was undertaken for this specific purpose, and completed late in 2006. The recommendations of this Review have been considered together with other City Plan reviews and studies and have been progressed into City Plan controls. This work was reported to Council and the CSPC in July 2008 as part of the <i>Green Square Background Paper</i>, along with specific parts of the proposed City Plan LEP controls.</p> <p>Generally, the Review recommends that the mixed use zone can be removed from some areas and replaced with a more appropriate zone that reflects the predominant or preferred land use – ie. residential, commercial, retail or industrial land uses. New employment and dwellings projections have been developed using the new zoning regime, and this information has been discussed and shared with the Department of planning.</p> <p>It is unclear as to what expectations are placed on the City to implement this action, particularly when public transport services provisions are not the responsibility of the City.</p>
SC C2.1.1	City of Sydney Council to ensure location of new dwellings maintains the subregion's performance against the target for the State Plan Priority E5.	<p>It is unclear what action is required.</p> <p>80% of new dwellings in the subregion cannot be located within the Strategic Centres.</p> <p>Strategic planning in Green Square has a strong centres policy that takes advantage of existing transport infrastructure, and resources such as parks and community facilities. In centre locations, higher residential densities are encouraged in the existing controls, and consolidated in the new City Plan controls. It has been the intent to increase residential densities in Green Square wherever possible, so long as the increased density does not have a detrimental impact on existing neighbourhood character and amenity, or on the amenity of the surrounding area.</p> <p>Both Action C2.1.1 and C2.1.2 should be amended to be more specific to the Sydney City Subregion and clarify the City's responsibilities.</p>
SC C2.1.2	City of Sydney Council to provide in their LEP, zoned capacity for a significant majority of new dwellings to be located in strategic and local centres.	<p>In respect of ensuring the Green Square Town Centre's success, it is considered the action plays down the role of State Government agencies which is critical in ensuring its success. The SCDSS provides an opportunity to achieve a whole of government commitment to ensure the Town Centre's and the Renewal Areas success. This relates for example to public transport infrastructure, health and educational facilities.</p>
SC C2.1.4	Council and Landcom to work in partnership on the implementation and delivery of the Green Square Town Centre.	

Action Ref.	Action	Response
SC C2.2.2	Council to investigate further opportunities for residential development for seniors through their Principal LEP.	Subject to ongoing discussions with the Department of Planning.
SC C3.1.2	City of Sydney Council to complete and implement urban design strategies for local centres and precincts as part of their Principal LEP.	Subject to ongoing discussions with the Department of Planning.
C4	<i>Improve housing affordability.</i>	<p>Lack of affordable housing in the City represents an economic and social risk to the community. The City is losing low and moderate income households, meaning the population is becoming wealthier over time.</p> <p>Where very low income households may access social housing, and high income households may afford to purchase or rent in the City, there is a 'hollowing out of the middle' whereby low and moderate income workers are being priced out of the City housing market. Where child care workers, baristas, cleaning staff etcetera are unable to access appropriate housing near employment there is a clear risk to the efficient functioning of the City's economy. This also becomes a question of equity, where key workers in the City are required to spend more time travelling to and from work, have less time to spend with their family, and are unable to participate in the community in which they are employed.</p> <p>SS2030 establishes an ambitious target that by 2030 7.5% of all housing in the City will be social housing and 7.5% affordable housing delivered by 'not-for-profit' or other providers. Achieving this target requires that 8797 additional dwellings be provided as subsidised rental dwellings in the LGA to 2030 (that is 20 per cent of all new dwellings). Realisation of this target will depend largely on the policies of other levels of government to increase the capacity of the not-for-profit sector and entice the investment of the private sector in affordable housing. Direct provision of affordable housing by Council will have a limited, but important part in achieving targets.</p>

Action Ref.	Action	Response
		<p>Despite its commitment to action C4.1.2 in the Sydney Metropolitan Strategy to 'Prepare an initial NSW Affordable Housing Strategy by mid 2006' which will include but not be limited to 'making better use of planning laws and regulations to encourage the growth of affordable housing stock', the Department of Planning has to date provided no guidance to local government on how they may facilitate affordable housing through planning instruments, nor does the Standard LEP Instrument include provisions relating to affordable housing.</p> <p>The draft SCDSS estimates that 31,793 dwellings will be provided in the City in the next five to ten years. If we are to achieve targets in SS2030 by ensuring a significant portion of this development is provided as affordable housing, then it is essential that the draft SCDSS action C4.3 to 'consider potential planning mechanisms to provide affordable housing' be completed in the short term so that the City may include provisions within City Plan now, rather than in a later amendment where the bulk of development has already occurred.</p> <p>Assuring an adequate stock of affordable housing into the future has two components. Firstly, local government, together with the State and Federal Government can provide/facilitate affordable housing to increase stock. Secondly, governments can act to protect the existing stock of affordable housing that, once gone, is unlikely that the private market, not-for profit housing providers or the City will be able fill the gap with housing that is accessible to most vulnerable groups.</p> <p>The loss of boarding houses and other low cost rental accommodation in the City has a profound effect on those at the bottom of the housing ladder, particularly people who are homeless and those at risk of homelessness. Although SEPP 10 Retention of Low Cost Rental Accommodation provides a mechanism to ameliorate the loss of low cost rental accommodation, there has been a sustained loss of boarding houses and other low cost rental accommodation in the City.</p> <p>The City recommends the SCDSS include actions towards exploring new and innovated approaches to protect existing affordable housing stock. This may include, but not be limited to improving existing planning mechanisms and real incentives for owners of existing low cost accommodation to retain it as such.</p>

Action Ref.	Action	Response
C4.1	Improve the affordability of housing.	See comments above
C5.1	Improve the design of new development and urban renewal.	Needs to include specific reference to SHFA and RWA sites.  Reference SS2030 whole of Strategic Direction 9 "Sustainable Development, Renewal and Design"

## D. TRANSPORT

### 1. Key Issues

#### *Integrated transport plan*

While not directly suggested in the Subregional Strategy, an integrated transport plan is strongly supported for Sydney with a single authority responsible for coordination and implementation. An integrated transport plan for Sydney must include all transport modes, pedestrians and cyclists. The City is committed to working cooperatively with state transport agencies to develop an integrated transport plan for Sydney.

#### *Improvements to transport infrastructure*

The City supports the continued improvements to existing interchanges, bus stops, stations and ferry wharves such as the upgrade of the Redfern Station precinct in terms of accessibility and ease of transferring between different services. Town Hall and Wynyard stations require urgent upgrading to relieve chronic platform congestion. Action is needed to integrate rail services at Green Square station with local and regional bus services and address the barriers to passengers using Green Square station including the walking distances between the bus services and the trains.

### 2. Comments on Background, Maps and Figures

#### *General Comments*

The City developed the SS2030 plan as the City's vision for a green, global and connected city which provides a long term plan to help guide the development of Sydney over the next 22 years and beyond. The vision will create a city which is easy to get around with a comprehensive network for walking and cycling, and a city centre which is connected to the rest of Sydney by fast and efficient public transport.

### *Improve Transport between Sydney's Centres*

Growth, especially in the airport to CBD corridor, is creating increased demand on our transport system. The State Government's commitment to develop high capacity public transport systems is strongly supported to cater for proposed population and employment growth targets for the City of Sydney Subregion and associated targets for the use of public transport. The North West, West and South East Metro proposals outlined in Sydney Link are consistent with the transport vision in SS2030 and are strongly supported. The development of other Sydney Link proposals, especially the West and South-East Metros, should be planned concurrently with the planning and construction of the North West Metro.

At a local level, the City of Sydney is committed to working cooperatively with state agencies to investigate the extension of light rail in the CBD and strongly supports extending the existing light rail network in the CBD to service the Barangaroo site and the western edge of the CBD along Hickson Road as part of a possible CBD loop between Central and Circular Quay.

### *Improve the Existing Transport System*

The City strongly supports proposals to improve the existing transport system including passenger capacity increases on existing services; shorter travel times; and integrated services, fares and ticketing. Integrated ticketing, which addresses the inequities in the current fare system, is long overdue and an essential component for improving the transport system which should be introduced as soon as possible.

The Sydney CBD caters for a substantial proportion of metropolitan Sydney's employment opportunities and is the hub of the rail network with all routes radiating away from the CBD. All stations in the Sydney City area should be provided with easy access lifts as a matter of priority in line with the Federal Government Disability Standards for Accessible Public transport. The City is committed to working with state agencies to prepare integrated network plans for all bus services which serve the City of Sydney.

### *Influence Travel Choices to Encourage More Sustainable Travel*

The City of Sydney is committed to encouraging walking and cycling as the first choice for people to move around the City. The challenge is to make the changes needed to make the city attractive for people to walk, cycle or just spend time enjoying. The recent Public Spaces and Public Life study undertaken by Jan Gehl and the Sustainable Sydney 2030 document provides the City with a blueprint to transform our city centre into a people friendly, public transport oriented, green, connected, attractive and distinctive city heart.

The City's parking policies constrain new parking supply and have contributed to maintenance of a high mode share for sustainable modes in the City of Sydney. The City looks forward to the adoption of similarly constrained parking levels and other innovative travel demand management measures in the Metropolitan Parking Strategy. The City has not received any information on the content, delivery or consultation on the Metropolitan Parking Strategy and would like to be consulted in the development of this document.

The City's Cycle Strategy and Action Plan adopted by Council in April 2007 will deliver up to 55kms of separated cycleway and 145 km of cycle paths over the next ten years from 2007 to 2017. The City of Sydney is committed to working cooperatively with state agencies to implement the Cycle Strategy and Action plan and would like new mechanisms for funding of local government-supplied sustainable transport infrastructure. .

#### *Improve Transport Decision Making*

While not specifically mentioned in the report, the City strongly supports an integrated transport plan for Sydney with a single authority responsible for coordination and implementation. An integrated transport plan for Sydney must include all transport modes, pedestrians and cyclists. The City is committed to working cooperatively with state transport agencies to develop an integrated transport plan for Sydney.

#### *Improve Freight Movements*

Expanded rail freight facilities are needed to carry the significant additional container activity estimated to be generated to 2031 at an expanded Port Botany. Freight should increasing be carried on rail facilities serving Port Botany and the implications of Port expansion activity on the road transport network within the Sydney City should be assessed and travel demand and traffic management measures included as an integral part of Port Botany expansion.

#### **Figure 32**

Map on page 93 needs to include light rail corridor mooted to Barangaroo.

### 3. Comments on Actions

Action Ref.	Action	Response
SC D1.1.1	The Ministry of Transport to coordinate the planning and implementation of the North West Metro and other potential Metro Link projects.	<p>The North West, West and South East Metro proposals outlined in Sydney Link are consistent with the transport vision in the SS2030 plan and are strongly supported.</p> <p>Planning for the North West Metro should consider the benefits of terminating the proposed Metro line at St James station against alternative terminus locations, such as Taylor Square, Surry Hills or the Moore Park Stadia. There is a need for firm delivery commitments and effective public engagement to provide confidence to investors, stakeholders and the general public to ensure the project is delivered and operating by 2017 as proposed.</p> <p>The development of other Sydney Link proposals, especially the West and South-East Metros, should be planned concurrently with the planning and construction of the North West Metro. Given the North West Metro would offer significant travel time savings over existing bus routes, consideration should be given to integrating Victoria Road and M2 bus services as feeders to the North West Metro.</p>
SC D1.1.2	The Ministry of Transport, together with bus operators and local councils, to implement the integrated network of Strategic Bus Corridors.	<p>Support for a program of bus priority works to improve bus priority and movement along the 12 Strategic Bus Corridors along with increasing use of environmentally appropriate vehicles.</p> <p>Support the development of Integrated Network Plans for Contract Region 6 (Inner West) and Region 9 (Eastern Suburbs). Network plans should better integrate with other transport services and enhance bus services to Green Square and Redfern – Waterloo redevelopment areas.</p>
SC D1.1.3	The Roads and Traffic Authority, together with the Ministry of Transport and local councils, to implement physical bus priority progressively to target a 25 kilometres per hour average bus speed on each of the Strategic Bus Corridors.	<p>Any bus priority measures proposed must ensure that facilities are integrated with the City's Cycle Strategy and Action Plan and also consistent with the recommendations from the City's Public Space and Public Life study.</p>
SC D1.1.4	The Roads and Traffic Authority, together with the Ministry of Transport, to plan and deliver the Victoria Road Upgrade with bus priority.	<p>Bus priority measures on Victoria Road should be expedited and include improvements to both cycling and pedestrian facilities along the corridor. Extra lane capacity should only be used to increase bus priority along the corridor rather than allowing for an increase in general traffic levels.</p>
SC D1.1.5	The Roads and Traffic Authority, together with the Public Transport Ticketing Corporation, to implement electronic bus priority.	<p>Electronic bus priority is strongly supported in conjunction with integrated ticketing across all modes and services.</p>

Action Ref.	Action	Response
SC D1.1.6	The Ministry of Transport in consultation with the State Transit Authority and the City of Sydney Council to provide sufficient and well located depot space for buses serving the Sydney City Subregion to ensure efficient bus services and support growth in services.	New off-street bus storage facilities including the proposed Domain layover facility are supported. Existing on-street bus layovers in the CBD eg around Circular Quay and Queen Victoria Building, are detracting from the urban amenity of major tourist precincts and should be progressively reduced and relocated. New depots and layover facilities should be located in suitable off-street locations.
SC D1.2.1	The Roads and Traffic Authority and Ministry of Transport to continue to coordinate road upgrades in existing urban areas, including bus priority measures to enhance bus services, and walking and cycling access.	Proposed road upgrades should be based on improving road based public transport services that contribute to achieving the public transport use targets outlined in the Government's Metropolitan Strategy rather than improving car access through motorway extensions which increases the propensity to drive, putting more cars on the road and would not provide any long term benefits.
SC D1.2.2	The NSW Government to investigate measures to deliver increased public transport capacity cost-effectively and protect corridors for higher capacity modes within and through the Sydney City Subregion.	<p>The City is committed to working with state agencies to deliver increased public transport capacity and to protect corridors.</p> <p>The existing rail network through the City Centre is already experiencing capacity issues especially during peak periods. Increased capacity should be investigated along rail lines and at Town Hall, Wynyard and Central stations.</p> <p>High capacity modes, including metro and light rail are also supported between the growth centres and the Sydney CBD. Corridors that serve the proposed North West Metro, West Metro and South-East Metro, Green Square, the former Carlton United Breweries site and Barangaroo should be identified to enable corridors to be preserved. Metro rail or light rail should also be investigated and provided on existing high demand bus corridors.</p> <p>The existing Metro Pitt and Metro West rail corridors should be retained and protected for possible future rail upgrades across the harbour.</p> <p>The proposed Park Street mid-city interchange with Town Hall station should ensure the inclusion of enhanced pedestrian facilities and separated cycleways consistent with the City of Sydney's Cycle Strategy and Action Plan.</p> <p>The City supports the relocation of buses from Castlereagh Street to Elizabeth Street as recommended in the CBD Bus Strategy together with consideration of through-routing of CBD bus routes.</p>

Action Ref.	Action	Response
SC D1.2.3	The NSW Government to facilitate long term plans for a light rail corridor from Barangaroo (East Darling Harbour) to Wynyard.	<p>The City strongly supports extending the existing light rail network in the CBD to service the Barangaroo site and the western edge of the CBD along Hickson Road as part of a possible CBD loop between Central and Circular Quay. Design and construction of this section of light rail should be expedited to provide additional public transport capacity in an area experiencing considerable additional development.</p> <p>The City of Sydney is committed to working cooperatively with state agencies to investigate the extension of light rail in the CBD.</p>
SC D1.3.1	The Roads and Traffic Authority and Ministry of Transport to investigate options to improve east-west links for freight connections between economic gateways in the east and Western Sydney.	Investigation of options for possible extension of the M4 Motorway should focus on reducing heavy vehicle movements through inner Sydney surface roads. The primary focus however should be on enhancing rail freight mode share through inter-modal facilities and rail lines.
D2.1	Complete Major Transport infrastructure projects underway.	Action is supported. Projects to be delivered as part of existing transport infrastructure projects should also be completed, including the M5 East cycleway project.
SC D2.2.1	The Transport Infrastructure Development Corporation and RailCorp to complete the Rail Clearways program by 2011.	The NSW Government should consider implementing the entire clearways project as previously proposed.
D2.3	Improve the integration of public transport.	<p>Improving the integration of public transport is strongly supported. The development of an Integrated Transport Plan is a key feature of the City's Sustainable Sydney 2030 project, especially for the inner areas of Sydney.</p> <p>Active modes of transport, such as walking and cycling should be further integrated with public transport services including fare integration. At present bicycles are charged a concession rate to travel on trains and can not be carried on bus services whereas bicycles can be carried free of charge on ferries.</p> <p>Secure bicycle parking facilities should be provided at interchanges and rail stations.</p> <p>This subsection appears to overlook the need to improve the integration of public transport and capacity issues at Central, Town Hall and Wynyard stations.</p>

Action Ref.	Action	Response
SC D2.3.1	The Public Transport Ticketing Corporation, together with the Ministry of Transport, to introduce integrated ticketing.	Action to introduce integrated ticketing across all modes of transport is strongly supported and long overdue.  The Public Transport Ticketing Corporation and the Ministry of Transport should also integrate fares to improve modal integration, maximise passenger convenience and remove existing disincentives to multi-modal trips.
SC D2.3.2	State and Local Government to improve existing interchanges, stations, bus stops and ferry wharves.	The City supports the continued improvements to existing interchanges, bus stops, stations and ferry wharves such as the upgrade of the Redfern Station precinct in terms of accessibility and ease of transferring between different services. Town Hall and Wynyard stations require urgent upgrading to relieve chronic platform congestion.  Action is needed to integrate rail services at Green Square station with local and regional bus services and address any barriers to passengers using Green Square station.  The NSW Government should roll-out a comprehensive program to install real-time information at interchanges and bus-stops throughout the Sydney City as required by the Federal Government Disability Standards for Accessible Public transport.
SC D2.3.3	The NSW Government to purchase new trains and buses to replace ageing fleet to cater for new growth and meet physical accessibility targets.	The NSW State Government should consider purchasing hybrid, electric or hydrogen fuel-cell buses as part of a "green" fleet replacement program.  Smaller buses should also be considered on routes operating on narrow and congested inner city roads or where passenger demand dictates.  Acquisition of new rail rolling stock should be expedited and allow for bicycle storage to further integrate sustainable transport modes.
SC D2.3.4	RailCorp to continue its Easy Access station program, including works at Martin Place and Museum Stations to be completed over 2011 and 2012.	Given that the CBD caters for a significant proportion of Metropolitan employment, tourism and special events, it is appropriate that all stations, including St James be upgraded to Easy Access. as a matter of priority in line with the Federal Government Disability Standards for Accessible Public transport.
SC D2.3.5	The Ministry of Transport, State Transit Authority and RailCorp to continue to improve the transport information system known as the 131500 Transport Infoline, and investigate opportunities for real time information.	Improvements to the 131500 Transport Infoline should include the shortest actual walking and cycling routes between transport stops and destinations to improve sustainable transport choices.  All modes of transport that operate within the subregion, including monorail and light rail should be included in the 131500 Transport Infoline site.

Action Ref.	Action	Response
SC D2.4.2	The NSW Government to implement the CBD Bus Strategy to improve bus operations in the CBD and support continued growth in bus services in surrounding subregions, as many services start or finish in the CBD.	<p>The City of Sydney is committed to working cooperatively with state agencies to review and implement the CBD Bus Strategy in a manner which enhances bus priority, while improving pedestrian amenity and safety for all road users including cyclists.</p> <p>The proposed George Street Transit Mall investigation should consider extension of the transit mall for the entire length of George Street between Central and Alfred Street, and provide improved facilities for pedestrians and cyclists. This is in line with the Sustainable Sydney 2030 project and the recommendations from Jan Gehl's Public Spaces, Public Life project.</p> <p>The City strongly supports the development of comprehensive Integrated Network Plans for the bus contract regions servicing the City of Sydney including the non-contract CBD area. Bus through-routing should be considered together with additional cross-regional connections.</p>
SC D2.4.3	The Roads and Traffic Authority to continue to manage traffic on Sydney's major road network through the Transport Management Centre to improve efficiency for all road users.	Action supported. Management of the road network should include all road users including cyclists, pedestrians and public transport and not just traffic movements. Guidelines for public transport, walking and cycling with specific targets should be developed to ensure efficiency for all road users.
SC D2.4.4	Ministry of Transport to continue to examine options to improve taxi services.	Action support. Taxis provide an important element in the transport mix. Measures are required to improve the accessibility, quality of services, introduction of environmentally friendly vehicles and to improve safety.
SC D2.4.5	Sydney Ferries Corporation to review ferry services to ensure services meet the needs of commuters and tourists.	<p>The City has successfully trialled one minute pick-up and drop-off facilities and is currently increasing the number of these zones throughout the local government area.</p> <p>New destinations that could be served by ferry including should be investigated, specifically:</p> <ul style="list-style-type: none"> <li>• Barangaroo;</li> <li>• Glebe Point;</li> <li>• Pyrmont and Jacksons' Landing; and</li> <li>• Sydney Fish Markets.</li> </ul> <p>The recent Walker Inquiry to Ferry Services recommends the creation of a second ferry hub in the City of Sydney with the provision of either a new facility at Barangaroo or an enhanced facility at King Street Wharf to ease congestion at Circular Quay.</p>

Action Ref.	Action	Response
SC D3.1.1	City of Sydney Council to implement the City of Sydney's draft Cycle Strategy and Master Plan.	The City's Cycle Strategy and Action Plan is no longer a 'draft' as it was adopted and finalised by Council in April 2007. The information from Action F1.3.3 in the Parks, Public Places and Culture section should be included in this action.
SC D3.1.2	The Roads and Traffic Authority, in cooperation with City of Sydney Council, to continue to upgrade walking and cycling facilities to improve everyday access within and across neighbourhoods, villages, town centres and Strategic Centres in the Sydney City Subregion.	Action supported. Enhanced pedestrianisation of the CBD is a major focus of the Sustainable Sydney 2030 and should be delivered by the Roads and Traffic Authority in co-operation with the City of Sydney. The Roads and Traffic Authority should also co-operate with the City in delivering improved cycle facilities along with improving pedestrian and cycling priorities.
SC D3.1.3	NSW Government and local government to align local walking and cycling networks with public transport routes to improve accessibility to public transport.	The provision of bicycle parking facilities at transport interchanges should be considered together with the integration of station access with pedestrian facilities in the CBD. Action is urgently required to improve walking and cycling connections to Green Square Station and upgrade pedestrian connections between Barangaroo and Wynyard station.
SC D3.2.1	City of Sydney Council to apply the Metropolitan Parking Policy to Strategic Centres in the Sydney City Subregion including the Planned Major Centre of Green Square and Central Sydney in developing local parking policies.	Reference to applying the Metropolitan Parking Policy is not appropriate as no details have been provided in relation to the Metropolitan Parking Policy. The City would like to be consulted in the development of this document.
SC D3.3.1	The NSW Government, in partnership with local government and the community, to develop programs which target travel demand management.	Action is supported. Funding assistance should be provided for councils to disseminate Travelsmart and other travel demand management information.
D4.1	Improve transport planning.	Improved transport planning is supported in addition to an integrated transport plan which should be developed for Sydney. An integrated transport plan for Sydney must include all transport modes, pedestrians and cyclists. The City is committed to working cooperatively with state transport agencies to develop an integrated transport plan for Sydney.  A single authority responsible for coordination and implementation of all transport related issues should be established.

Action Ref.	Action	Response
SC D5.1.1	NSW Government to plan and implement a five berth expansion of Port Botany.	Expanded rail freight facilities are needed for Port Botany to carry the significant additional container activity estimated to be generated to 2031. Freight should increasingly be carried on expanded rail facilities serving Port Botany. The implications for the road transport network within the Sydney City subregion should be assessed and travel demand and traffic management measures included as part of Port Botany expansion activity.
SC D5.2.3	The NSW Government to encourage the shift of movements on road to rail, and to road in the off-peak.	The City supports the shift of freight movement from road to rail in both peak and off-peak periods in line with separation of passenger and freight services in SC D5.2.2.
SC D6.1.1	NSW Government to develop freight strategies for domestic intermodal freight.	Rail freight capacity expansion works which also benefit commuter rail movements should be actioned as a priority.
SC D7.1.1	The NSW Government to examine options to improve road links between Port Botany and Western Sydney including a possible extension to the M4 Motorway.	Options to improve road links between Port Botany and Western Sydney should ensure the protection of residential amenity for residents on surface streets with commensurate expansion of public transport services to maintain targets for public transport use.

## E. ENVIRONMENT, HERITAGE AND RESOURCES

### 1. Key Issues

#### *Environmental Sustainability and Climate Change*

Since the 2005 release of the Metropolitan Strategy a concern for sustainability and climate change has accelerated and its impact on other topic areas is now held to be pervasive, if not defining. However, sustainability and climate change is not identified as a separate topic in the draft sub-regional strategy, merely as a component of general environmental concerns that include heritage and resources. Even though sustainability references are embedded throughout the draft strategy, the generality of their expression and an absence of a separate treatment convey a sense of uncoordinated action, or worse, a lack of sufficient concern.

The SCDSS could be remedied by developing a separate analysis of sustainability issues and then the inclusion of relevant actions from SS2030.

## 2. Comments on Background, Maps and Figures.

### **General Comments**

Environmental sustainability and climate change has emerged as a significant threat to just about every sector of life, especially that experienced in cities. It is well recognised that environmental degradation can only be addressed by strong coordinated and cooperative action at all social organising levels from the local to the global. SS2030 identifies this importance explicitly as a separate topic and as a large component of several others, including transport, “green links”, and housing.

Since the 2005 release of the Metro Strategy a concern for sustainability and climate change has accelerated and its impact on other topic areas is now held to be pervasive, if not defining. However, sustainability and climate change is not identified as a separate topic in the SCDSS, merely as a component of general environmental concerns that include heritage and resources. Even though sustainability references are embedded throughout the SCDSS, the generality of their expression and an absence of a separate treatment convey a sense of uncoordinated action, or worse, a lack of sufficient concern.

The SCDSS could be remedied by developing a separate analysis of sustainability issues and then the inclusion of actions from SS2030 that are relevant to sub-regional strategies

### **Waterways (p. 110)**

The introduction to Alexandra Canal is noted. However, it is disappointing to see that there are no actions relating to this major asset to the subregion. An action requiring (and guiding) the investigation of its remediation would be desirable, for example, in action E2.1 (p.112). Similarly, actions that reflect the long-term vision derived from the Alexandra Canal Masterplan coordinated by the former South Sydney Development Corporation (and SS2030) should be included in the SCDSS.

### **Heritage of the Built Form (p. 111)**

The background section refers to individual heritage items and places, but does not refer to conservation areas/precincts. These are of course a critical component of the city and contribute so much to defining individual neighbourhoods and their character. It is recommended that a reference is made to the importance of heritage precincts/conservation areas. For example; "Conservation areas demonstrate the historical development of the city over time, as well as the diverse nature of that development, from working class areas such as Newtown and Erskineville, to the grand homes fronting Centennial Park. Conservation areas are urban precincts where the historic fabric and setting provide a distinct character and amenity, adding to the diversity and quality of the City's neighbourhoods."

**Figure 34 Resources and Heritage in the Sydney City Subregion (p.119)**

The purpose of this map is unclear. The meaning of the dark-shaded areas around the harbour and Centennial Park and the Alexandra Canal is also unclear.

**Other**

On the whole this is considered a very generalised chapter lacking specific guidance.

**3. Comments on Actions**

Action Ref.	Action	Response
SC E2.1.2	The Sydney Metropolitan Catchment Management Authority to work with agencies and City of Sydney Council to ensure that the aims and objectives of Catchment Action Plans are considered in the future management and planning of local council areas.	Reference to SS2030 should be included along with the Environmental Management Plan and other City strategies. This includes increased use of recycled water as a part of the Green Infrastructure Plan. The Green Transformers are to be located close to appropriate sewer infrastructure to treat sewage to a level fit for use as recycled water and used for low grade water uses. Green Transformers could supply approximately 10 per cent of the City's water demand.  There are existing stormwater management plans in the City of Sydney and we have implemented a stormwater levy. The levy will enable the City to improve stormwater quality, alleviate and prevent local flooding, and develop systems to reuse stormwater and reduce reliance on mains water supply.
SC E2.1.4	Council and relevant State Government Agencies to seek advice from the Department of Primary Industries on the use of waterway zonings of the Standard LEP and other provisions to maintain and improve the health of both large and small waterways.	Subject to discussions with relevant agencies.
SC E2.1.5	City of Sydney Council, Department of Planning, Redfern–Waterloo Authority and Sydney Harbour Foreshore Authority to continue to promote water-sensitive urban design.	Reference to Hyde Park water reuse from Busby's Bore and the Cross City Tunnel should be changed to say alternative water sources.

Action Ref.	Action	Response
E2.4	Protect Aboriginal cultural heritage.	This action should be relocated to section 'E6 Conserve Sydney's Cultural Heritage' rather than in the section addressing the protection of the environment.
SC E2.5.1	Council to identify and consider major noise sources when preparing its Principal LEP.	Subject to discussions with relevant agencies.
E3	Achieve sustainable use of natural resources.	Key Direction 6 on page 10 and the Key Action on page 106 to "Reduce greenhouse gases through improved efficiency and use of renewable resources" are not reflected in the actions throughout part E., particularly E.3. The NSW State of the Environment Report defines 'ecological footprint' as a population's, 'notional amount of 'biologically productive' land required to produce the ecological resources the population consumes and absorb the waste it generates.' The 'ecological footprint' is a comprehensive indicator of sustainability while the actions of part E.3 are limited in scope. The actions omit initiatives which are necessary to reduce the subregion's ecological footprint. The actions should also consider water efficiency, as well as reuse, for all development types (E3.2.1); energy efficiency and reduction of greenhouse gas emissions for all development types and planning authorities (E3.3); and encourage the implementation of principles of ecologically sustainable development for all development throughout the subregion (E.3.3.2).
SC E3.2.1	Council to encourage other large water users such as industries and golf courses or large redevelopment of residential areas to use recycled water from industries or Sydney Water sources where applicable.	It is recommended that the actions should ensure that the key direction for reducing the ecological footprint of the subregion can be achieved. Reference to Sydney Park and the electrical cable tunnel should be changed to alternative water sources such as adjacent stormwater catchment areas.
E3.3	Use energy efficiently and reduce greenhouse intensity of energy supply.	The actions do not demonstrate how the subregion is to contribute to the targets of the NSW Greenhouse Plan, which are for a 60% cut in greenhouse emissions by 2050 and return to year 2000 greenhouse emission levels in NSW by 2025. The actions are limited in scope as they refer only to Council operations and the implementation of ESD by the RWA.  It is recommended that comprehensive actions are developed that will ensure the subregion appropriately contributes to State targets for Greenhouse gas emissions. The actions should also include specific support for developing and meeting energy efficiency and greenhouse gas emissions targets in major renewal areas.

Action Ref.	Action	Response
SC E3.3.1	NSW Government to give in principle support to the City of Sydney in its aim to become the first carbon neutral council in NSW.	<p>The City acknowledges the support of the NSW Government. To clarify, 'carbon neutral' is a goal of the City's Environmental Management Plan (EMP) and relates to the operations of Council and not the whole LGA. For the whole LGA, the EMP has set a specific target for a 70% reduction of greenhouse gas emissions on 1990 levels by 2050 and 25% of electricity to be from renewable sources by 2025. Council aims to demonstrate leadership by becoming 'carbon neutral', however, the LGA wide targets are more important for achieving the SCDSS's key direction of reducing the ecological footprint.</p> <p>As the action relates only to the target for Council operations it is not clear whether the NSW Government supports actions to reduce greenhouse gas emissions throughout the LGA such as energy efficiency improvements, green transformers and the City Switch*</p> <p>The action refers to "in principle" support by the NSW Government to the City in becoming carbon neutral. This is considered a very timid approach to the challenges presented by climate change. The NSW Government should be a partner in this aim and work with the City towards it, and facilitate collaboration by the various agencies involved, such as electricity providers. The case of establishing 'green transformers' and the regulatory hurdles involved in achieving this is an example where this partnership could deliver significant outcomes.</p> <p>*Note: The 3CBDs Greenhouse Initiative has become a National program called CitySwitch Green Office. It is run in partnership between the cities of Sydney, North Sydney, Parramatta, Adelaide, Perth, Brisbane, Melbourne and Willoughby, the state government agencies the NSW Department of Environment &amp; Climate Change and Sustainability Victoria. Its main aims are to improve tenant office energy efficiency, reduce the greenhouse gas emissions produced in Australia, decrease the overall electricity and water demand in each participating council business district, and positively influence a widespread market transformation within the office tenancy sector with a focus on sustainability issues.</p>
SC E3.3.2	Redfern-Waterloo Authority to implement Ecologically Sustainable Development through urban renewal.	<p>The City is also working to implement principles of Ecologically Sustainable Development (ESD), as articulated in current planning instruments. Implementing ESD will contribute to the SCDSS's key direction of reducing the ecological footprint. It is recommended that the SCDSS equally acknowledges the City's need to implement ESD principles in development. The action should relate to urban consolidation as well as urban renewal. The action should also articulate a broad 'whole of building' approach such as that described in Clause 27 of <i>Sydney LEP 2005</i>.</p>

Action Ref.	Action	Response
E3.4 E5	Minimise and recycle waste. <i>Adapting to climate change.</i>	Council intends to implement principles of ESD through the recently exhibited <i>Draft Ecologically Sustainable Development - Development Control Plan</i> and eventually the consolidated City Plan DCP. Council is currently working to resolve issues raised in the exhibition of the Draft DCP to ensure effective planning controls.  It is recommended that the action is redrafted to state, “ <i>Council, Sydney Harbour Foreshore Authority and the Redfern–Waterloo Authority to implement Ecologically Sustainable Development through urban renewal and urban consolidation.</i> ”  Lacks any real tangible actions and it is unclear what the deliverables are in relation to these aims.  Much of the discussion in this section is based around national frameworks and state-level plans (e.g. National Climate Change Adaptation Framework, NSW Greenhouse Plan, NSW State Plan). Objectives and targets are not drawn down to a subregional level. It is unclear what role, if any, councils should play in achieving these targets.
E5.1	NSW Government to implement the National Climate Change Adaptation Framework.	The City is currently preparing a ‘Climate Change Adaptation Preliminary Plan’ which on the basis of the work undertaken in ‘Mapping Climate Change Vulnerability in the Sydney Coastal Councils Group Region’ (Preston et al., 2008) identified four potential impact areas for the City:  <ul style="list-style-type: none"> <li>• Extreme heat and human health effects</li> <li>• Sea-level rise and coastal hazards</li> <li>• Extreme rainfall and urban stormwater management</li> <li>• Natural ecosystems and assets</li> </ul> It is recommended that the Department of Planning should provide guidance on how to incorporate potential impacts from climate change in Principle LEPS, beyond those potentially experienced in the Coastal Zone, such as loss of biodiversity, sea level rise, extreme weather events and extreme heat.  Lacks any real tangible actions and it is unclear what the deliverables are in relation to these aims.

Action Ref.	Action	Response
E6	Conserve Sydney's cultural heritage.	A further action could be added to this section dealing with sustainability and heritage. For example: "The Department of Planning in consultation with local councils is to develop an understanding of the environmental costs and benefits of maintaining and adapting historic housing stock".
SC E6.2.4	The Heritage Council to develop guidance on the adaptive reuse of heritage items to provide for high quality urban renewal.	The Heritage Council, in association with the RAIA, has already developed adaptive reuse guidelines (recently launched), called <i>New Uses for Heritage Places</i> . The SCDSS could therefore be amended to read similar to E6.2.2. For example; "Council to refer to the Heritage Council's <i>New Uses for Heritage Places</i> (2008) in the preparation of development control plans".  Furthermore, the text currently underneath E6.2.4 talks about funding and floor space incentives. This doesn't seem to match the adaptive reuse strategy to which it relates. I therefore suggest that this text be placed under a new strategy dealing with conservation incentives

## F. PARKS, PUBLIC PLACES AND CULTURE

### 1. Key Issues

No major issues of concern identified

### 2. Comments on Background, Maps and Figures

#### *Provision of Open Space (p.126)*

Suggest change to wording in final paragraph from "was recently commissioned" to "the Open Space and Recreation Needs Study was adopted by the City of Sydney on 2 April 2007"

**Figure 36 - Recreational Space in Sydney City Subregion (p.127)**

- The Map should show the proposed open space corridors and connections along the Alexandra Canal tributaries, which are a significant aspect of adding permeability through the Southern Industrial Area and Green Square. The *Open Space and Recreation Needs Study* and *SS2030* identify these;
- Nuffield Park (between Kirkby Walk, Ascot Av, Hutchinson Walk, George Julius Ave is missing – it is an sports/active park;
- Recheck the location of (and existence of ) the recreational trail through Alexandria Park;
- Tennis and basketball courts are missing from Prince Alfred Park (west of the main N-S path);
- Include stadium symbol for Sydney Cricket and football grounds;
- Add aquatic centre (future) for Green Square;

**Figure 36. Graphics errors**

Camperdown Park location is incorrect (not in City LGA).

Extent of active sports park for Bicentennial Park and Rushcutters Bay Park is incorrect.

**Figure 37 Cultural Assets and Events of the Sydney City Subregion (p.131)**

Include Markets in Danks Street, Waterloo and Victoria Park, Zetland (nearing completion).

Green Square Town Centre should include many symbols such as night economy, cinemas, theatre etc that are associated with such a major planned centre.

Add library for Green Square Town Centre.

### 3. Comments on Actions

Action Ref.	Action	Response
F1.2	Improve the quality of regional open space.	Estimated expenditure for the total upgrade of Sydney Park will be over 25 million, not 8.9 million. It needs to be clear that the vast majority is Council expenditure.
SC F1.2.1	NSW Government and council to continue to upgrade the public domain at iconic places.	SS2030 identifies as potential projects the development of 3 squares. Two of these; Circular Quay and Railway Square are largely under state government control and are certainly iconic and should be explicitly included.
SC F1.2.3	City of Sydney Council to focus on enhancing existing open space across the subregion.	Prince Alfred Park upgrade also includes upgrade of existing pool complex.
SC F1.3.1	The Department of Planning and City of Sydney Council in partnership with Department of Environment and Climate Change and the Roads and Traffic Authority to continue to develop the framework for an integrated network of regional recreation trails as part of the overall open space system.	A significant part of the trails identified are on land under the control of SHFA. Hence, SHFA should be explicitly identified as well.  The City is committed to developing the regional cycle network and welcomes the opportunity to work cooperatively with state agencies. Funding assistance is needed from state transport agencies for a network of regional cycleways within and through the City of Sydney.
SC F1.3.2	City of Sydney Council and NSW Government to continue to upgrade access to foreshores within the subregion.	This should include a statement that the State Government will progress implementation/development of Bank Street foreshore park at Pyrmont.
SC F1.3.3	Relevant NSW Government agencies (such as the RTA) to review the City of Sydney's Cycle Strategy and Action Plan to determine feasibility.	SS2030 objective of also establishing a "Cultural Ribbon" along the Harbour foreshore. This action item should be revised in line with the action at SC D3.1.1.
SC F2.1.1	City of Sydney Council to maintain or increase the provision of local open space particularly in centres and along transport corridors where urban, and particularly residential, growth is being located.	A 7400sqm park is planned for the Ashmore Precinct, and there are other parks specifically identified for Green Square under the existing <i>South Sydney Development Control Plan 1997: Urban Design – Precinct G: Green Square</i> .
SC F2.1.2	City of Sydney Council to consider an open space embellishment program for improving facilities.	Dibbs Street Reserve is in the suburb of Alexandria, not Erskineville.

Action Ref.	Action	Response
SC F2.1.3	City of Sydney Council to consider modifying under-used open space for informal activities such as skating, basketball, netball and the establishment of cafés.	The option of skate facility in Prince Alfred Park is under review.
F2.2	Investigate Future Options for Open Space Provision and Management.	Include the 7 400sqm for the Ashmore Precinct and other major parks proposed for Green Square which are specifically identified under the existing <i>South Sydney Development Control Plan 1997: Urban Design – Precinct G: Green Square</i> .
SC F2.2.2	The Department of Planning to continue to plan for the development of a waterfront city park at Barangaroo.	The City of Sydney should be partners in this process. The City's preference is for urban waterfront development alongside parkland. Without sufficient residential population danger that site could be only 9-5pm use.  Consideration should also be given to re-allocation of open space from Barangaroo to a redeveloped Darling Harbour
SC F2.2.4	The City of Sydney Council to consider the future upgrade and enhancement of Harold and Wentworth Parks and investigate any other future open space opportunities.	Typo City of Sydney
SC F3.1.1	The NSW Government and City of Sydney Council, as appropriate, to consider any opportunities to refurbish, reorientate and increase the carrying capacity at existing sporting facilities.	Increase in capacity for these facilities should be linked with improved public transport access to reduce on site car parking impacts on Moore Park.
SC F3.1.3	The NSW Government to consider future convention space in the Sydney City Subregion.	Refer to comments in A1 above regarding "Category 3 Land" and better utilisation of land under state government control.

## G. IMPLEMENTATION AND GOVERNANCE

### 1. Key Issue

The implementation chapters of SS2030 and the SCDSS are largely comparable. However, the governance relationships mooted in the SCDSS are essentially top-down and thereby fail to acknowledge the partnership opportunities unique to this subregion. This contrasts with relationships directly proposed in SS2030.

It is considered that there is an opportunity for expression in the SCDSS of greater State reciprocation of the City's SS2030 initiatives.

### 2. Comments on Background, Maps and Figures

#### **General Comments**

The last chapters of SS2030 and the SCDSS are largely comparable. However, the governance relationships mooted in the SCDSS are essentially top-down and thereby fail to acknowledge the partnership opportunities unique to this subregion, comprising of a single, relatively well resourced and very significant LGA.

This contrasts with relationships directly proposed in SS2030, including the following actions:

- 10.1.1 – Investigate and establish place making arrangement for effective delivery of SS2030 strategic directions...
- 10.1.2 – Establish project – and locality – based partnerships with senior officers from state government.
- 10.3.5 – Establish criteria for better agreements with state government agencies regarding funding obligations for City works and projects
- 10.4.1 – Establish and ratify a Charter between City of Sydney and state government for delivery against *Metropolitan Strategy*, *State Plan* and other state policy objectives.
- 10.4.2 – Continue to work with Council of Capital City Lord Mayors and engage with the federal government on investing in capital cities.
- 10.4.4 – Assess new partnership opportunities by reference to SS2030 principals and objectives.
- 10.4.5 – Continue to engage with Inner Sydney councils and national and global cities.

It is considered that there is an opportunity for expression in the SCDSS of greater state reciprocation to Council's SS2030 initiatives.

### ***Sustainable Sydney 2030 (p.149)***

The SCDSS refers to 7 of the 10 Strategic Directions SS2030 as being common to both documents. This should be expanded to include the topics raised in SS2030, whether under its existing 7 topic headings or under additional heads. The Department is encouraged to dedicate time and resources in order to bring forward its intention for subsequent reviews and apply SS2030 thinking to the current SCDSS.

References throughout the SCDSS to *Sustainable Sydney 2030* being a strategic plan should be corrected. It is now referred to as the *Sustainable Sydney 2030 Vision* to differentiate it from a strategic plan.

### **3. Comments on Actions**

<b>Action Ref.</b>	<b>Action</b>	<b>Response</b>
SC G2.1.1	The NSW Government and City of Sydney Council to work together to align core objectives and targets in their strategic plans.	There will be a timing issue for the finalisation of the SCDSS if it needs to incorporate SS2030 elements; also, which elements are likely to be included and will this fundamentally change the SCDSS?
SC G2.1.3	Landcom and City of Sydney Council to plan for the development of Green Square as a Planned Major Centre.	Landcom as the City's development manager and separately as a development entity plays a major role in the redevelopment of the Green Square Town Centre. Landcom's role within the 'Planned Major Centre' area is much more limited (outside the Town Centre) – Landcom being the master developer for the Victoria Park site. Landcom also actively seeks the collaboration of other NSW Government agencies to achieve certain outcomes for the area which have a direct influence on the success or otherwise of Landcom's areas of interest (eg public transport infrastructure on the Town Centre).  The points made for pages 64 and 65 of the SCDSS are relevant here. Green Square as a 'Planned Major Centre' needs to be recognised as encompassing the entire Urban Renewal Area with the Town Centre at its core.
G3.4	Leverage strategic government land assets.	Landcom's area of responsibility in 'Green Square' needs clarification. For this initiative to be meaningful it is recommended that it includes specific reference to the significant state government owned land controlled by its development agencies SHFA and RWA.
G5.1	Monitor and adapt the strategy.	Employment capacity targets have been revised from those in the Metro Strategy and will be further reviewed with release of 2006 journey to work and commercial floor space survey. It is unclear how the updated information will be used and how it can be accommodated within the LEP.  Replace the words "Commercial Floorspace Survey" with "Floor Space and Employment Survey".