



Ms Therese Manns  
General Manager  
Randwick City Council  
Administration Building & Customer Service Centre  
30 Frances Street  
Randwick NSW 2031

Dear Ms Manns

### **Randwick Local Housing Strategy 2020**

Thank you for submitting Randwick Council's Local Housing Strategy (LHS) to the Department for approval.

The Department commends Council on its strong commitment to strategic planning and the preparation of a robust evidence base to support its LHS, providing Council with a clear understanding of the housing needs, challenges and opportunities of the Randwick local government area (LGA) within the context of the Eastern City District and the Greater Sydney Region Plan.

I also note Council's considerable work in developing its strategic planning approach and the work to date to prepare the Planning Proposal and supporting studies for the forthcoming Comprehensive Randwick LEP.

I have determined to approve Randwick Council's LHS dated February 2020. In doing so, I have determined that the approval is granted on the basis that the Randwick LHS:

1. is generally consistent with the Eastern City District Plan and the Randwick Local Strategic Planning Statement (LSPS), subject to the requirements identified below.
2. demonstrates Council's commitment to implementing appropriate and timely actions to deliver the housing-related priorities in the Eastern City District Plan and LSPS, and its intent to prepare such planning proposals necessary to give effect to the District Plan.
3. provides a credible, but partial, evidence base and analysis of the key requirements, opportunities and challenges for housing in Randwick LGA.
4. addresses housing supply, including the 6-10 year housing target, to be delivered through capacity under existing planning controls, Kensington and Kingsford precincts, and the forthcoming Comprehensive LEP.
5. identifies specific opportunities for longer term housing supply, noting further work will need to be undertaken, including a more comprehensive analysis of opportunities and constraints, and alignment with future transport infrastructure investment.

6. addresses housing diversity, with actions to identify and amend planning controls to facilitate delivery of more diverse housing, subject to the requirements below.
7. addresses housing affordability, including a robust evidence base and commitment to an AHCS.
8. is generally consistent with Section 9.1 Directions and SEPPs, with exception to the requirements identified below.

The approval is subject to Council addressing the following requirements:

1. Within four (4) months of Council being notified of the LHS approval, Council is to prepare an updated and prioritised Implementation and Delivery Plan that clearly articulates the actions, roles and responsibilities, sequencing and timing to facilitate housing supply, diversity and affordability between 2021 and 2026 and beyond. The Plan should be prepared in consultation with DPIE, TfSNW and School Infrastructure NSW (SINSW), to ensure any critical interdependencies are satisfactorily resolved. This is to ensure that the Department and other State agencies have a clear understanding of the roles and responsibilities required to facilitate a consistent housing supply pipeline in Randwick.
2. Monitor and review housing supply pipeline and completions and to work with DPIE to address any identified issues to ensure achievement of Action 1.1 (Review LEP 2012 to provide for additional capacity to meet the 6-10 year housing target). A monitoring and review system will ensure that appropriate mechanisms can be identified and implemented to contribute to Eastern City District housing supply over the medium to long term.
3. Prepare the planning proposal for Comprehensive Randwick LEP, ensuring that it demonstrates that the proposed approach is the most effective application of planning provisions to achieve “HS Priority 2: Diverse housing to meet the needs of our community”. Subject to meeting any conditions for Gateway approval and any relevant assessments, Council should seek to submit the Comprehensive Randwick LEP to the Department for finalisation by June 2022 so as to support the provision of additional housing that will contribute to its 6-10 year housing target.
4. As committed to in its LHS, Council is to prepare an Affordable Housing Contribution Scheme (AHCS) in conjunction with major precinct based planning and consequent rezonings to ensure achievement of Action 4.2 (Identify appropriate areas to apply an AHCS requiring a proportion of all development to be dedicated as affordable housing and amend LEP 2012 to give effect to this). This is to ensure that work to extend AHCSs is progressed. It is noted that Council has taken this approach for the HIAs and should provide an evidence base, including feasibility analysis, to form part of the Comprehensive LEP planning proposal.

5. Note that the following LHS actions are not supported and are therefore are not approved as part of the LHS approval:
  - a. Action 2.3 - Exemption from *State Environment Planning Policy (Exempt and Complying Development Codes)* (Codes SEPP) including any exemption for dual occupancies under this Code is not supported, unless progressed in conjunction with local character provisions and it can be demonstrated that this outcome is appropriate (see advisory notes for more details)
  - b. Action 2.6 - Exemption from the *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004*
  - c. Action 2.7 - 90-day threshold on short term rental accommodation in the LEP
  - d. Action 4.3 - Exemption from the *State Environmental Planning Policy (Affordable Rental Housing) 2009*
6. Should Council wish to exclude limited areas from the Low Rise Housing Diversity Code (LRHDC) this may be achieved through the application of local character areas under the LEP. Council will need to provide a comprehensive evidence base in relation to the delivery of medium density housing (see advisory notes for more detail). This should include:
  - a. Historical and forecast supply of medium density housing, including statistics on range of housing types approved over the last five years (DA and CDCs) and anticipated future take up rates.
  - b. Include recommended controls outlined in LHS for medium density in implementation plan, including current status and timeline for implementation.
7. Council is to collaborate with relevant State government agencies (including DPIE, TfNSW and LAHC) to identify and progress longer term housing supply opportunities in a timely manner per Section 3.2.2 of the LHS and LHS *Action 7.3: Ensure any future redevelopment is aligned with future transport investment and local infrastructure investment*. Collaboration with TfNSW should seek to understand potential South Eastern Sydney Transport Strategy (SESTS) land use scenarios and sequencing, and to work with DPIE to identify urban renewal opportunities, having regard to the directions of the SESTS.

This work should include more detailed analysis of land use opportunities and constraints for future housing supply to confirm long term housing targets.
8. While not fully aligned with the LHS, the Comprehensive LEP amendments are generally supported as they seek to achieve greater diversity and further housing opportunities. It is however required that the planning proposal for this Comprehensive LEP demonstrates that the proposed amendments provide the most effective application of local planning provisions to achieve the LHS Priorities and Actions, in particular to demonstrate that the proposed approach to delivering housing diversity in the Comprehensive LEP update is the most effective application of

planning provisions to achieve “*HS Priority 2: Diverse housing to meet the needs of our community*”.

9. Council is to articulate in any future and relevant strategic planning work, the need to balance employment and housing functions of the Randwick and Eastgardens – Maroubra Junction strategic centres, and in particular with regard to facilitating housing supply and affordability to meet the needs of lower income workers in the Randwick Education and Health Precinct.  
  
Council is to collaborate with Bayside Council for the future planning of the Eastgardens strategic centre. The investigation area should include the confirmation of future implementation mechanisms including any necessary planning proposals and their timing.
10. Council is to consider and include diverse housing opportunities within all place-based planning work, to ensure housing diversity is encouraged and enabled, particularly within identified centres.
11. Council is encouraged to review the impacts of the proposed Housing Diversity SEPP on the provision of affordable housing, student housing and seniors housing in the LGA, within 6 months of gazettal of the new SEPP and consider any necessary changes to its controls to continue to support and encourage these forms of alternative housing in the LGA.
12. Prior to the preparation of revisions to the Randwick LSPS and following the making of the next District Plan, Council should undertake more detailed analysis of land use opportunities and constraints to confirm long term housing supply capacity (10+ year timeframe). As committed to under council’s LHS this work should be supported by collaboration with relevant stakeholders, including LAHC and TfNSW, to understand potential *Future Transport 2056* and SESTS land use scenarios and sequencing, and working with DPIE.
13. Prepare principles for assessing proponent-initiated requests for planning proposals, including out-of-sequence criteria to consider any additional opportunities for growth that are not identified in the LHS, or for urban renewal opportunities.
14. The direction and strategic planning approaches endorsed in any State-led precinct plans are to prevail in the event of any inconsistency with this approval and/or the Council’s local housing strategy (as revised and current).
15. Update the LHS to include the current date of its endorsement by Council.
16. Council is to update or revise the LHS to inform Council's updates/ revision to its LSPS following the making of a future District Plan.

Further detail on actions to address these Requirements are provided in the advisory notes.

Any planning proposals for new housing development will be assessed against the approved LHS and the requirements and advisory notes of this approval. Any State Government policy changes that may occur after the approval of the LHS are to prevail in the event of any inconsistency.

### *Implementing your Local Housing Strategy*

The LHS demonstrates a commitment to achieve the housing and associated priorities of the Randwick LSPS and the Eastern City District Plan.

The State Government is committed to reducing the time taken to complete planning proposals that support housing delivery by tailoring the steps in the process to the complexity of the proposal, and by providing clear and publicly available justification for each plan at an early stage.

To meet these commitments, a detailed implementation plan is required. This should reflect a comprehensive work program for all strategic planning work Council commits to undertake to implement its Local Housing Strategy, and should include but not be limited to:

- Comprehensive Randwick LEP Planning Proposal including seeking Gateway approval, and if given Gateway approval, amendment, exhibition and finalisation.
- Relevant place based strategies including planning for Randwick Junction Town Centre Strategy and Eastgardens-Maroubra Junction
- Approach to development contributions, including Council's revised S7.12 Contributions Plan
- Other relevant studies including Recreational Needs and Open Space Study and the Community Facilities Study
- Engagement with TfNSW on SESTS land use scenarios and LAHC on future social housing renewal
- Detailed analysis of land use opportunities and constraints
- any other relevant studies or interdependencies with NSW Government decisions.

Council is to complete the preparation of the planning proposal for the Comprehensive LEP update identified in the LHS, and proceed subject to any Gateway Conditions, identifying sufficient additional housing supply in the Housing Investigation Areas, Low Rise Medium Density areas, and the R2 minimum lot size amendments. The Proposal is to demonstrate that the approach to housing diversity is the most effective application of planning provisions to achieve "HS Priority 2: Diverse housing to meet the needs of our community".

### *Local Housing Strategy Reviews and Updates*

A review and update process will provide an opportunity to align Council's LHS and LSPS, ensuring a cohesive strategic planning framework is in place for the Randwick LGA.

It will also provide Council with the opportunity to improve and clarify aspects of the LHS. The advisory notes enclosed provide specific guidance on matters that Council is encouraged to consider when updating the LHS. The Department will expect these same matters to be addressed in planning proposals and will be reinforcing them through Gateway determinations as an interim measure in the absence of the LHS review process.

We strongly recommend that Council also review and revise (where required) its LHS before the LSPS is required to be reviewed by the Greater Sydney Commission. This will help best inform the next update to the LSPS.


In particular, I note that Council will need to complete a more detailed analysis of opportunities and constraints to provide a strategic justification for future housing supply level and review the assumptions underpinning the analysis of likely housing delivery under current planning controls prior to future strategic planning work.

The advisory notes enclosed provide specific guidance on matters that Council is encouraged to consider when updating the LHS. The Department will expect these same matters to be addressed in planning proposals and will be reinforcing them through Gateway determinations.

Once again, I would like to take this opportunity to acknowledge the significant amount of work your team has undertaken to develop the LHS. Please be advised that the LHS will be published on the NSW ePlanning Portal alongside the letter of approval and advisory notes.

Should you have any further questions, please do not hesitate to contact me on 8275-1128.

Yours sincerely



**Amanda Harvey**  
**Executive Director, Local Strategies and Plan Making**

23 June 2021

Encl: Advisory Notes



# Randwick Local Housing Strategy

## Advisory Notes

The following advisory notes identify the further work Council will need to undertake to strongly position future planning proposals and further iterations of the Local Housing Strategy (LHS). The advisory notes provide specific guidance on matters that Council is encouraged to consider when next updating the LHS. The Department will expect these same matters to be addressed in planning proposals and will be reinforcing them through Gateway determinations as an interim measure until the LHS is further updated in accordance with the approval requirements and these notes.

Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
<b>General</b>	
Implementation Approach	<p>Council is to prepare and commence working to a comprehensive work program and implementation plan for the Local Housing Strategy within 3 months of this approval being granted by the Department and to share this with the Department.</p> <p>The program should identify clearly defined roles, responsibilities and definitive timeframes and should specifically address (but not be limited to):</p> <ul style="list-style-type: none"> <li>• Comprehensive Randwick LEP Planning Proposal including seeking Gateway Approval, and if given Gateway Approval, amendment, exhibition and finalisation</li> <li>• Relevant place-based strategies including planning for Randwick Junction Town Centre Strategy and Eastgardens-Maroubra Junction</li> <li>• Approach to development contributions, including Council’s revised S7.12 Contributions Plan</li> <li>• Other relevant studies including Recreational Needs and Open Space Study and the Community Facilities Study</li> <li>• Engagement with TfNSW on South East Transport Strategy land use scenarios and LAHC on future social housing renewal</li> <li>• Detailed analysis of land use opportunities and constraints</li> <li>• Any other relevant studies or interdependencies with NSW Government decisions.</li> </ul>



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	<p>Council is to prepare the Planning Proposal for the Comprehensive LEP update identified in the Local Housing Strategy, and proceed subject to any Gateway Conditions, identifying sufficient additional housing supply in the Housing Investigation Areas, Low Rise Medium Density areas, and the R2 minimum lot size amendments.</p> <p>The Proposal is to demonstrate that the proposed approach to housing diversity is the most effective application of planning provisions to achieve “HS Priority 2: Diverse housing to meet the needs of our community”.</p>
Strategic framework	<p>Council is to strengthen the application of its strategic framework to local plan making by:</p> <ul style="list-style-type: none"> <li>• Preparing requirements for consideration of strategic merit for out of sequence requests for Planning Proposals from proponents, utilising the Criteria for Growth;</li> <li>• Utilising clear criteria for identifying transitional areas for medium density housing around strategic and town centres;</li> <li>• Clarifying the use of the Recreational Needs and Open Space Study and the Community Facilities Study in plan making decisions; and</li> <li>• Finalisation of the revised Randwick S7.12 Contributions Plan.</li> </ul> <p>Council should consider preparing as a supplementary document or future revisions of the Local Housing Strategy:</p> <ul style="list-style-type: none"> <li>• A clear description of the different roles of residential and mixed use zones, including the distinction between R2 low density areas that do or do not permit low rise medium density housing, and balancing the need for residential, commercial and other land uses.</li> </ul>
Review and monitoring framework	<p>Council is to work with DPIE to regularly monitor the housing supply pipeline (development applications, approvals and completions) including supply expected to be delivered under existing planning controls and major redevelopment sites. Where there is evidence that planning controls are not enabling housing supply to be delivered, Council and DPIE will collaborate to identify additional opportunities and accelerate updates to its LEP.</p>





Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
<p>Proponent initiated requests for Planning Proposals</p>	<p>The inclusion of a transparent and robust framework to consider additional opportunities will assist Council, the Department and other relevant agencies to assess proposals that are inconsistent with the LHS. It will also ensure that changes to land use or development controls do not take place without demonstrating strong strategic merit.</p> <p>Council is encouraged to develop a framework within which to consider such proposals, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Strategic merit and case for change</li> <li>• Robust demographic evidence</li> <li>• Demand analysis and economic impacts</li> <li>• Infrastructure delivery and funding to be borne by the proponent</li> <li>• Stakeholder consultation and outcomes</li> <li>• Sustainability and resilience</li> </ul>
<p>Consultation and engagement with agencies</p>	<p>Council is to continue consultation with the following agencies and councils:</p> <ul style="list-style-type: none"> <li>• TfNSW: ensure LHS implementation responds to existing transport service capacity and strategic transport planning. This may include the completion of specific transport studies that consider road and rail network capacity, facilitating freight movement, and ongoing transport infrastructure investigation and investment.</li> <li>• TfNSW, LAHC and DPIE: develop a collaboration program to understand potential SETS land use scenarios and sequencing, social housing renewal; and long term housing opportunities.</li> <li>• Neighbouring councils: Collaboration with Bayside Council on planning for Eastgardens-Maroubra Junction and with Waverley and Woollahra on affordable housing</li> <li>• DPIE Policy in relation to progressing Council's planning proposal for Local Character Areas and for student housing.</li> </ul>



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
Interdependencies with relevant local evidence base	<p>Incorporate the findings and outcomes of latest studies, policies and State-led precinct plans prepared since the publication and release of the LHS, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Place based planning studies for Randwick Junction town centre and Eastgardens-Maroubra Junction strategic centre</li> <li>• Other relevant studies including Recreational Needs and Open Space Study and the Community Facilities Study</li> <li>• Detailed analysis of land use opportunities and constraints</li> </ul>
<b>Delivering</b>	
Short to medium term housing opportunities	<p>In collaboration with DPIE, Council is to monitor and review the supply and delivery of housing, in particular to track its performance against the 6-10 year housing target including development applications, projects with development approval, and the delivery of housing opportunities associated with the Comprehensive LEP update.</p> <p>Where there is evidence that planning controls are not enabling housing supply to be delivered, Council will collaborate with DPIE to identify additional opportunities and accelerate updates to its LEP.</p>
Longer term housing opportunities	<p>To ensure a rigorous approach to identifying long term housing supply, Council is to:</p> <ul style="list-style-type: none"> <li>• undertake more detailed analysis of land use opportunities and constraints for future housing supply to confirm long term housing targets, and this work should be supported by collaboration with relevant stakeholders, including TfNSW, to understand potential SETS land use scenarios and sequencing.</li> <li>• establish clear criteria for the assessment of future areas to be identified under Action 3.2 (to provide for appropriate transition or buffer areas around town and strategic centres)</li> <li>• collaborate with relevant state government agencies (including DPIE, TfNSW and LAHC) to identify and progress longer term housing supply opportunities in a timely manner (Action 7.3: Ensure any future redevelopment is aligned with future transport investment and local infrastructure investment).</li> </ul>



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
<p>South East Transport Strategy (SETS)</p>	<p>Future housing growth will need to be contextualised having regard to <i>Future Transport 2056</i> and the South East Transport Strategy (SETS), with particular mention of future mass transit serving the Randwick LGA and Metro lines proposed to connect the Harbour CBD to Randwick, La Perouse and Kogarah.</p> <p>Council is to collaborate with TfNSW to understand land use scenarios for SETS initiatives, including support for additional housing capacity, renewal of Government land, growth and expansion of the Randwick Health and Education Precinct, including assessment of potential opportunities for affordable housing and key worker housing.</p> <p>The potential for individual SETS initiatives to support additional development uplift, renewal of Government land, growth and expansion of the Randwick Health and Education Precinct, and specifically associated affordable housing and key worker housing should be emphasised in future iterations of the LHS.</p>
<p>Delivering long term housing supply opportunities</p>	<p>Significant resources are required to deliver major precinct planning and associated changes to planning controls. Council should consider providing a clear program of future work for its town centres and major redevelopment centres, aligned with TfNSW's transport planning.</p> <p>Where relevant, Council is to prepare further planning proposals following completion of relevant place-based strategies, to deliver identified future housing supply opportunities. It is expected that planning proposals will reflect:</p> <ol style="list-style-type: none"> <li>1. Rigorous analysis of housing opportunities and constraints across the LGA,</li> <li>2. Engagement with stakeholders, including DPIE and other NSW Government agencies, the local community and land owners.</li> <li>3. Council's analysis of infrastructure requirements, open space and recreation, and urban design and sustainability priorities.</li> </ol>
<p><b>Affordable housing</b></p>	
<p>Affordable housing</p>	<p>Council is to ensure that affordable housing work continues to be progressed in conjunction with major rezonings, noting that the LHS indicates that additional precincts will be identified for application of an AHCS as precinct planning for urban renewal sites and town centres are progressed.</p>



<b>Matter</b>	<b>Consideration for future LHS updates and preparation and assessment of planning proposals</b>
	Council could consider an approach to collaborate with Waverley and Woollahra Councils, noting that Randwick LHS commits to work with adjoining Councils to develop a regional approach to affordable housing. The exercise should explore any other cross boundary initiatives that would benefit from a collaborative joint Council approach.
<b>Facilitating a consistent housing supply pipeline</b>	
Monitoring housing supply	<p>In collaboration with DPIE, Council is to monitor and review the supply and delivery of housing, in particular to track its performance against the 6-10 year housing target including development applications, projects with development approval, and the delivery of housing opportunities associated with LEP amendments (when finalised).</p> <p>Where there is evidence that planning controls are not enabling housing supply to be delivered, Council will collaborate with DPIE to identify additional opportunities and accelerate updates to its LEP.</p>
<b>Local Character</b>	
	<p>Should Council wish to exclude limited areas from the Low Rise Housing Diversity Code (LRHDC) through local character areas, the LHS will need to provide a comprehensive evidence base in relation to the delivery of medium density housing.</p> <p>This should include:</p> <ul style="list-style-type: none"> <li>• Historical and forecast supply of medium density housing, including statistics on range of housing types approved over the last five years (DA and CDCs) and anticipated future take up rates.</li> <li>• Include recommended controls outlined in LHS for medium density in implementation plan, including current status and timeline for implementation.</li> <li>• Incorporate framework to monitor and review the delivery of medium density housing within the LGA.</li> </ul>