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Australia's property industry Creating for Generations

16 August 2019

Mr George Dedes The General Manager City of Ryde Locked Bag 2069 North Ryde NSW 1670

Dear Mr Dedes

Planning Ryde: Draft Local Strategic Planning Statement 2019

The Property Council welcomes the opportunity to provide comments on council's draft Local Strategic Planning Statement (LSPS) and associated documents currently on exhibition. As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers, and developers of property across all asset classes. We are pleased to provide the following comments for your consideration.

The Property Council supports the position taken by Council to use the LSPS as a mechanism for the translation and give effect to the land-use based strategies identified in Council's Community Strategic Plan, *Our Vision for Ryde 2028*. It has appropriately identified a range of steps Council must take in planning for the city's future and respond to the Greater Sydney Commission's *Greater Sydney Regional Plan* and *North District Plan*.

Our members look forward to the finalisation of Council's draft LSPS by 30 March 2020 and the subsequent process that will involve Council updating *Ryde Local Environmental Plan 2014* to give effect to the relevant provisions of the regional and district plans.

Comments on specific parts of the draft LSPS are provided in the following submission.

Should you have any questions in respect to this matter, please contact Troy Loveday, Senior Policy Advisor, on (02) 9033 1907 or <u>tloveday@propertycouncil.com.au</u>

Yours sincerely

Jane Fitzgerald NSW Executive Director Property Council of Australia

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Part 2- Infrastructure and Collaboration

2.1 Housing Growth and Relationship to Infrastructure

The Property Council understands there is a perception through the media and other forums that the City of Ryde has experienced unexpected levels of residential growth over the last 2-3 years. A number of outcomes have followed from this perception including a pause on planning proposals for residential development, delayed commencement of the *Low Rise Medium Density Housing Complying Development Code* and an Assurance Review conducted by the Greater Sydney Commission. It is acknowledged that the City of Ryde is one of many councils in Sydney that has experienced a level of development that is higher than average of councils in the Sydney region. The Property Council welcomes the State Government's recent investment in new transport, education, health and recreational infrastructure in the City of Ryde. It is important that infrastructure delivery keeps pace with growth in residents and jobs across all of Sydney.

Council's draft LSPS provides a summary of dwelling numbers that have been and will be delivered in the City of Ryde between 2016 and 2021. Based on Council figures, more than 12,000 dwellings will be delivered during this period, exceeding the District Plan target of 7,600. It is appropriate that most of this new housing will be delivered within the Macquarie Park corridor near the newly opened Metro stations. It is also appropriate that most of the City of Ryde's growth will be focused within centres that are well connected by public transport services.

Council has identified the three key challenges that it faces:

- Transforming West Ryde,
- Preserving Macquarie Park as an economic centre, and
- Protecting the valued character of low density residential & restricted anticipated growth.

The Property Council acknowledges that these issues are challenges for the Council and will provide responses to proposed actions where relevant.

2.2 Infrastructure

The draft LSPS has identified six (6) priorities to be considered with the funding and delivery of infrastructure and responded by developing more than twenty (20) related actions to be implemented by Council. Action IN2.1 has proposed that a new Macquarie Park Employment Land Study be undertaken to identify a commercial core that will can be protected from non-employment land uses. The Property Council supports Council and the State Government working together to deliver a better planning outcome for Macquarie Park.

Council has identified that it will complete a Housing, Infrastructure and Centres and Places strategy to inform the consideration of site-specific planning proposals. The Property Council supports the use of the LSPS and its structure plan to inform and guide responses to planning proposals. However, Council's intention to suspend consideration of site-specific planning proposals until they can be assessed against the above strategies is opposed. It is imperative that Council undertake to prepare and implement its planning studies, including the LSPS, and give effect to them through its Local Environment Plan, but this should not come at the expense of a landowner approaching Council with requests to vary zoning and other planning controls.

Part 3 - Liveability

3.1 Housing Supply, Affordability, Diversity and Amenity

The draft LSPS has identified the 4,500 housing completions in the City of Ryde during the last 3 years compared to the 20 year average of 600 dwellings per annum. The Property Council has noted the 1-5 year housing targets in the North District Plan and looks forward to Council preparing its housing strategy to inform and guide decisions about longer term housing targets.

The Property Council supports steps that the Council is taking regarding providing greater diversity of housing within the City of Ryde. As a middle-ring council, the City of Ryde should aim to provide a mix of low, medium and high-density dwellings to give the community a wide range of choice to meet their housing needs. Actions H3.1 and H3.2 are supported and welcomed.

Unlike most other councils across Sydney, the City of Ryde allows multi-unit housing within all residential zones. For this reason Council has been granted a deferral on the code's commencement until June 2020 to allow for completion of Council's Housing Strategy and Local Environmental Plan review. The Property Council accepts Council has legitimate reasons for undertaking these reviews and would expect their outcomes do not result in less diversity in housing compared to that currently available.

The draft LSPS provides an update on the strategies Council will pursue in respect of housing affordability within the City of Ryde. In 2016 Council adopted a policy to deliver an increased share of affordable housing being 5% of all new dwellings by 2021. The Property Council has supported the Greater Sydney Commission's targets stated in the Regional and District Plans that involve affordable housing targets between 5 to 10% of dwellings generated by zoning uplift subject to feasibility. We look forward to talking to the Greater Sydney Commission and local councils on the next stage of implementation of these targets.

3.2 Centres

The draft LSPS has nominated five centres within the City of Ryde which will be compact, sustainable, mixed-use centres servicing their local neighbourhoods. These centres, Ryde, Eastwood, West Ryde, Gladesville and Shepherds Bay (Meadowbank), were developed as mixed-use precincts providing residential dwellings and areas for employment uses. Council has identified a list of challenges and targets associated with these centres. In response it has proposed seven planning priorities and more than 20 actions to give effect to the priorities. Of these actions there are a few that require collaboration with the multiple agencies within the State Government and others that Council can implement independently. It is recommended that Council include timeframes for the implementation of these actions within the main body of the LSPS.

3.3 Heritage

The draft LSPS has given recognition to the City of Ryde's built heritage including 170 heritage items, five heritage conservation areas and two archaeological sites. It has identified the key challenges to be the protection of cultural and natural heritage in accordance with community views, support to owners of heritage properties to assist with their protection and the protection and enhancement of Aboriginal heritage.

In order to address these challenges, two planning priorities and eight actions have been proposed. It is recommended that Council include timeframes for the implementation of these actions within the main body of the LSPS.

3.4 Culture and Wellbeing

The draft LSPS identifies libraries, community and cultural facilities and events as important services under this section. The planning priorities and actions proposed are generally supported by the Property Council.

3.5 Design Excellence

The draft LSPS has identified the level of design in both public and private spaces to be important issues for the local community. Accordingly, two planning priorities have been nominated for this section - design quality and placemaking. Ten actions are proposed to give effect to these planning priorities. The Property Council recommends Council engage with the development and property industry as part of the introduction of any new planning controls that seek to implement these actions.

Part 4 - Productivity

4.1 Economy and Jobs

The draft LSPS has identified five targets within this section, including:

- 19,000 new jobs by 2036,
- Inward investment into Macquarie Park and Town Centres will increase,
- 1,250,000m2 of commercial office space in Macquarie Park by 2036,
- 60% of the journey to work will be by public or active transport modes, and
- Increased diversity in local employment opportunities.

Council has proposed three planning priorities and six actions to give effect to these targets. The Property Council supports these actions. It is recommended that Council include timeframes for the implementation of these actions within the main body of the LSPS.

4.2 Macquarie Park

The draft LSPS has recognised the strategic importance of Macquarie Park to the City of Ryde as an emerging urban centre as commercial offices develop and industrial type uses relocate. The 340 hectare precinct offers a range of land uses including a regional shopping centre, university, medical precinct, Sydney second largest office market and pockets of local open space.

Council has identified more than 15 key challenges under the following headings:

- City shaping
- Transport
- Lifestyle and amenity.

The Property Council has reviewed the eight planning priorities and more than 20 actions to be delivered during the plan's life. The main action proposed is the preparation of a masterplan that will implement principles related to urban structure, access/transport, employment/business, infrastructure/governance, housing and sustainability.

Council has proposed a funded Infrastructure Strategy be prepared by December 2020 and the masterplan be prepared by December 2021. The Property Council recognises the importance of Macquarie Park to the State and regional economies and recommends the Council and State Governments enter into a partnership arrangement to accelerate a good planning outcome for Macquarie Park.

It is recommended that Council include timeframes for the implementation of these actions within the main body of the LSPS.

Part 5- Sustainability

5.1 Open Space and Active Recreation

The draft LSPS has identified more than 15 key challenges relevant to this issue including the pressure placed on existing parks and sporting facilities within the City of Ryde. A series of four targets have been developed as part of the LSPS:

- No net loss of public open space in the City of Ryde,
- All dwellings will be within 400m of active public open space larger than 1,500sqm in area,
- A network of recreational corridors, links & connections running through the City of Ryde,
- Local flora and fauna will be effectively conserved and return of the Powerful Owl species.

Council has developed five appropriate planning priorities and fourteen actions to give effect to these targets. It is recommended that Council include timeframes for the implementation of these actions within the main body of the LSPS.

5.2 Environment

Council in its draft LSPS has identified a wide range of environmental challenges to be addressed over the next 10-20 years. These are supported by targets, planning priorities and actions to give effect to the goals set out in the draft plan.

It is recommended that Council include timeframes for the implementation of these actions within the main body of the LSPS.

5.3 Resilience

The Property Council has noted the City of Ryde will take action to make it more resilient into the future. These steps are supported.

Part 6 - Implementation

The draft LSPS has clearly set out the process for the implementation, ongoing monitoring and reporting of measurable priorities and actions. The strategic direction contained within Council's draft LSPS will give Council a strong basis for future decisions regarding land-use planning.

Once the LSPS is finalised and adopted, it is recommended that Council publish regular updates regarding its implementation so that the community and stakeholders have oversight regarding the implementation of its targets.