



Randwick Business Centres Discussion Paper

Submission from Randwick Botany Greens

1. Overview

This submission is informed by Greens NSW *Planning, Building and Infrastructure Policy 2010*.ⁱ The submission addresses the Recommendations pages 95-6 drawing on the Appendices for detail.

This discussion paper is one in a series of six discussion papers implementing the former NSW Labor Government's program to give uniformity to land zoning across NSW. Greens NSW policy recommends the abolition of the standard instrument LEP that gives rise to this Discussion Paper. It is the view of Greens NSW that local planning instruments should be devised by local councils and that the standard instrument is insufficiently flexible to adapt to local conditions. As the standard instrument forms the basis of, and impetus for, the *Randwick Business Centres Discussion Paper*, however, this local Greens group submission complies with the required framework.

The Greens are not opposed to the principle of urban consolidation as a means to reduce our environmental footprint and to maximise arable land and clean water supplies.

The principle of urban consolidation becomes unsustainable, and potentially harmful however, when social, economic and environmental infrastructure is not considered essential to, and therefore is not integrated into, the framing of planning instruments.

The current LEP is more conservative than the one proposed in the Discussion Paper yet the current LEP has produced the following problems:

- a) services such as schools and hospitals to become stretched beyond their capacity
- b) inadequate transport and poor traffic flow
- c) tension over competing demands for parklands
- d) stormwater, flooding and toxin problems
- e) unsafe pedestrian (especially children and elders) and cycling routes
- f) undersupply of camping and campervan facilities rendering streets and car parks as the only alternatives
- g) loss of heritage
- h) increased noise and reduction in the peace and enjoyment of residential living

The northern end of Randwick LGA has reached the limit of its infrastructure and therefore should not be zoned for any greater density.

The coastal strip is not given sufficient attention in this document. One of the dangers of statewide uniformity is that the amenity, risks, tourism load, and habitat of coastal regions is downplayed. The Coastal strip deserves zoning in its own right. Council should introduce, in this zone, a moratorium on any increase in height/FSR/density within that zone whether the land use is business, residential or open space.



The following recommendations from the *Randwick Economic Activity Study* (2008) at p. 36 are supported. These suggest:

...“where there is legitimate concern that local services are being pushed out of these centres, the B1 Neighbourhood Centre Zone may be selectively used...

...ensure the character of these centres is protected.

Limit expansion of commercially zoned areas in Coogee, Maroubra and La Perouse...

It relies on data from 2007 so it would be surprising if Kingsford had not, by 2011, outstripped Coogee in Employment Floorspace (p.32).

The absence in this document of definitive recommendations regarding planning for the business centre of Coogee is worrying. The suggestion that “ a major review...placed on hold in late 2010” (p.47) will recommence leaves readers speculating upon the weight of interests to be served in that non-transparent process. The expectation was that this Discussion Paper would be the access point for the community to contribute to zoning options for Coogee.

Applications of the terms of State Environmental Planning Policies (especially SEPP 1) in Council decisions has resulted in very large numbers of development approvals being well outside the limitations of the current (and previous) LEPs. SEPP 1 and its applications reduce the credibility of LEPs as planning instruments and undermine community confidence in councils. The new SEPP 1 incarnation as *Compulsory Clause 4.6 Exceptions to Development Standards* which would increase its statutory power, excites neither confidence nor certainty.

Finally, Council is encouraged to submit to the State Government a recommendation that BASIX (Building Sustainability Index) criteria should be applied to commercial as well as residential developments.

2. Comprehensive Local Environment Plan (LEP)

2.1 LEP aims

Local provision of services to maximise ecological sustainability by satisfying residents' shopping and service needs close to home is recommended as the key priority in business planning for Randwick LGA. Our coastal character and the risks associated with higher density development on the foreshore as well as the questions of protection of character and heritage should feature in our LEP aims.

2.2 LEP zones

Direct translation of current planning controls into the new framework is generally supported except for the proposal related to Coogee.

Coogee should not be considered in the same zoning category as Maroubra Junction, Randwick Junction nor Kingsford. The latter three areas are situated on major arteries and their business districts are not shared with ground level housing. The number of business premises in the main Coogee precinct is very also few in comparison to Maroubra or Randwick Junctions and Kingsford.



Although it is not mentioned in the recommendations, Coogee should be zoned B1 Neighbourhood Centre maintaining a height limit of 12m and with priority given to preserving the architectural history of the block between Arden and Brook Sts, allowing for no increase in building bulk or height. Unlike the Anzac Pde Centres with which Coogee is aligned in this Discussion Paper, Coogee's main business zone is also a residential zone.

The Objective: "To minimise the impact of development on adjoining and nearby residential zones" is welcomed. (p.109)

Kensington, like Coogee, includes residential property at ground level within the business zone. Kensington should retain a B1 zoning.

Kingsford reflects the B2 Local Centre classification. Higher population in the Prince Henry complex may result in B2 Local Centre classification for Matraville also.

B1 zoning is supported for the extra nine centres although, unless they already incorporate three storey buildings, the 9.5 metre limit should be sufficient.

Zone boundaries:

Kensington (p.111): land adjoining Kensington Public School that is currently horse stables marked in pink for rezoning for business should be rezoned as open space for use as a playground by the students of Kensington Public School. Increased population density requires more space for the school that now has very little playground remaining. The departure of Gaye Waterhouse's stables is a rare opportunity to give priority to the interests of our children over the interests of business. Council must commence negotiations regarding acquisition with NSW Department of Education immediately in this regard.

Bream St Coogee: Recommend 9.5m height and FSR 1:1.

Frenchmans Rd/Clovelly Rd: Recommend 9.5m and FSR 1:1.

Specific rezoning submissions:

Malabar Rd: Not supported. Should remain residential. This is a very dangerous part of the road to be stopping for shops. (p.133)

Carr St, Coogee: Not supported. This rezoning would encroach on the peace and amenity of the residential zone of Kurrawa Ave.

131 Alison Rd: Not supported. Expansion of the Labor Club is not more important than the provision of housing.

2.3 Development standards



To all nine new B1 Neighbourhood Centres apply the same FSR of 1:1 and height limit of 9.5m.

3. Comprehensive Development Control Plans (DCPs)

There is little to contribute regarding DCPs as they are to be “reviewed”. Comment will have to wait until the DCPs are drafted and put to the community for consideration.

4. Additional considerations

It would have been of assistance to have consistent means of marking proposed zoning changes in Appendix 4. These variously coloured diagrams make the proposals difficult to assess.

The lack of clear LEP parameters for zoning in Coogee is unfortunate.

Additional “corner shop” zonings should be considered throughout the LGA as a means to encourage residents to leave cars at home when seeking basic supplies.

The absence of serious discussion about planning for improved environmental sustainability in the economic life of communities re reduction in car use, accommodation for cycling, waste, water and solar harvesting, local food production and alternatives means of supplying goods and services etc reflects a short-sighted plan.

Questions of the range of services needed by communities received little attention in the document. For example, galleries and venues for music or dance performance, public squares and seating as well as spaces for community gatherings in the business districts were not considered.

The interface between late night venues and residential areas deserves serious attention.

Greening and shading of business strips and outdoor public seating were, similarly, not considered, nor was public access to fresh water. Not everyone wishes to spend money for a simple drink of water. Access arrangements for people with disabilities received minimal attention and certainly did not appear to be a compulsory zoning clause.

ⁱ http://nsw.greens.org.au/sites/greens.org.au/files/policydownloads/Planning_0.pdf