



PLANNING PROPOSAL

Bondi Junction Strategic Centre- Protecting and promoting non-residential floor space

Reference – PP-3/2019

Planning Proposal Information

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EXECUTIVE SUMMARY

This Planning Proposal intends to create the provisions to protect non-residential floor space capacity and promote non-residential floor space delivery in the Bondi Junction Strategic Centre. The intention of protecting and promoting this non-residential floor space is that it may be used for developing employment generating and knowledge intensive uses. The Planning Proposal intends to do this through introducing a minimum non-residential floor space provision in the B4 Mixed Use zone in Bondi Junction and limiting serviced apartments to the B4 Mixed Use zone. Development permissible in the non-residential floor space will be all development permissible in the B4 Mixed Use Zone excluding residential accommodation, tourist and visitor accommodation, self-storage units and carparking.

Based on the findings of the Bondi Junction Commercial Centre Review, this PP outlines the need for protecting non-residential floor space within Bondi Junction and the means by which the PP intends to do this. In order to maintain Bondi Junction's status as a Strategic Centre the centre needs to have a minimum of 10,000 jobs which requires a sufficient amount of floor space to accommodate these jobs. The recent development history of Bondi Junction has seen a trend of large-scale residential towers replacing the existing non-residential floor space with residential floor space; resulting in a high loss of non-residential floor space and therefore floor space that can be used for employment generating and knowledge intensive uses.

This PP seeks to introduce a minimum non-residential floor space provision for all lots in the B4 Mixed Use zone so that the existing level of non-residential floor space is maintained. This PP also intends to limit serviced apartments to the B4 Mixed Use zone as there are limited available sites remaining in the B3 Commercial Core zone that can be redeveloped for employment generating and knowledge intensive uses. The serviced apartment use which acts as a quasi-residential use, does not provide high levels of employment like non-residential developments and as such is being listed as a prohibited use in the B3 Commercial Core zone. The intention of protecting and promoting non-residential floor space within Bondi Junction is in line with various endorsed Strategic Plans such as A Metropolis of Three Cities, the Eastern City District Plan, Waverley Community Strategic Plan and the Local Strategic Planning Statement, this PP gives effect to the objectives of these plans.

It is important that Council secure the remaining B3 Commercial Core area for employment generating and knowledge intensive uses (these uses are listed in this report) to meet a key action in the District Plan. Residential type uses have a fast take up rate and are therefore favoured by the development industry, often depleting the floor space available for employment generating and knowledge intensive uses. Securing the B3 zone and promoting employment generating and knowledge intensive uses in the B4 zone reflects a long-term view that grasps the cumulative effect of individual development decisions. A long-term view necessitates a 'structural' lens not a 'cyclical' one. Cyclical factors or short-term (quasi) residential development imperatives should not be allowed to cloud bigger picture planning visions. A structural view promotes long-term public economic benefits of commercial development against damage from short-term private financial gains from residential type uses. By improving the commercial integrity of the B3 zone and promoting employment generating and knowledge intensive uses in the B4 zone, Council secures much needed non-residential floor space to sustain the longer-term growth of the Bondi Junction Strategic Centre.

Following the gazettal of this PP, a second PP will be instigated looking at ways to increase the non-residential floor space capacity, beyond existing levels, within Bondi Junction.

PLANNING PROPOSAL SUMMARY

Council Reference	PP-3/2019	
LEP to be amended	Waverley Local Environmental Plan 2012	
LEP amended in the last five years?	No	
LEP	Current	Proposed
Zone	B3 Commercial Core B4 Mixed Use	In the B3 zone only: adding 'serviced apartments' to the list of prohibited uses.
Additional Permitted Use	NA	NA
FSR	Varies	No change
Height	Varies	No change
Heritage	Varies	No change
Additional Local Provision	NA	New minimum non-residential floor space provision to apply to site
Council Recommendation	Strategic Planning and Development Committee Meeting 6 August 2019	
Consideration	Comments	
Does the proposal have strategic merit?	Yes	
Consistent with the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment; or	Yes, this Planning Proposal is of critical importance and has strategic merit not only for Waverley LGA, but for the whole of the Eastern District. To deliver jobs and services within 30-minutes for residents in the Eastern District, Bondi Junction Strategic Centre plays a critical role. Accordingly, this Planning Proposal seeks to ensure no further loss of non-residential floor space and the protection of the limited remaining non-residential floor space capacity.	
Consistent with a relevant local council strategy that has been endorsed by the Department; or	Yes, this Planning Proposal is consistent with the recently endorsed Waverley Local Strategic Planning Statement.	
Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing planning controls.	Yes, this Planning Proposal is responding to a recent trend of residential development cannibalising non-residential floor space and capacity. This has not been accounted for in the planning controls, and as a result, the limited opportunities for redevelopment in Bondi Junction have resulted in a loss of non-residential floor space, and non-residential floor space capacity, in favour of residential accommodation for short term financial gains.	
Does the proposal have site specific merit?	Yes	
The natural environment (including known significant environmental values, resources or hazards); and	This Planning Proposal does not directly impact the natural environment, as there is no proposed increase in density to the area.	
The existing uses, approved uses, and likely future uses of land in the vicinity of the proposal; and	The Planning Proposal has site specific merit with regard to the existing and desired future uses of land within the Bondi Junction Strategic Centre. The future of the success of Bondi Junction as a Strategic Centre relies on the retention and growth of non-residential floor space.	
The services and infrastructure that are or will be available to meet the demands arising from the proposal; and	The Planning Proposal does not increase the built form of the Bondi Junction Strategic Centre.	
Any proposed financial arrangements for infrastructure provision.	The Planning Proposal does not increase the built form of the Bondi Junction Strategic Centre.	
Has Council prepared the planning proposal?	Yes	Council has prepared this Planning Proposal to ensure that Bondi Junction Strategic Centre can continue to serve the Eastern District by providing services and jobs.
Does Council support the planning proposal? What are the reasons?	Yes	<ul style="list-style-type: none"> The proposal supports the implementation of the Region Plan, District Plan, and Local Strategic Planning Statement. The proposal addresses a key problem within the area.
Waverley Local Planning Panel Recommendation	24 July 2019	
Consideration	Comments	

Does the proposal have strategic merit?	Yes	The Panel agrees that the proposal is a first step to stem the loss of commercial floor space and protect the limited remaining commercial floor space capacity.
Does the proposal have site specific merit?	Yes	The proposal is a step in meeting the necessary retention and growth of employment floor space.
Does the WLPP support the planning proposal? What are the reasons?	Yes	The issue of the loss of commercial floor space is one that has been noticeable for some time now and needs to be addressed urgently and see this planning proposal as an essential first step in that direction. The proposal is particularly apposite given the public transport infrastructure and the need to continue to generate increase numbers in the area.
Strategic Framework		
Document	Consistent	Relevant Directions, Planning Priorities, Actions, Goals, Strategies
Region Plan	Yes	'A well connected city' and 'Jobs and skills for the city' This is a vital step towards delivering the 30 minute city
District Plan	Yes	E6: Creating and renewing great places and local centres, and respecting the District's heritage, Action 18 E10: Delivering integrated land use and transport planning and a 30 minute city, Action 33 E11: Growing investment, business opportunities and jobs in strategic centres, Actions 38, 43, 46a and 46c
Local Strategic Planning Statement	Yes	PP8: Connect people to inspiring and vibrant places, and provide easy access to shops, services and public transport, Action 1 PP9: Connect people to inspiring and vibrant places, and provide easy access to shops, services and public transport, Action 3 PP11: Bondi Junction is a lively and engaging strategic centre with a mix of employment, entertainment and housing options, Actions 5, 7, 11
Community Strategic Plan	Yes	Goal 4.1: Promote Waverley as a significant sustainable economy and innovation precinct Goal 4.2: Ensure Bondi Junction and Waverley's villages continue to have a diverse range of businesses, local jobs and services

INTRODUCTION

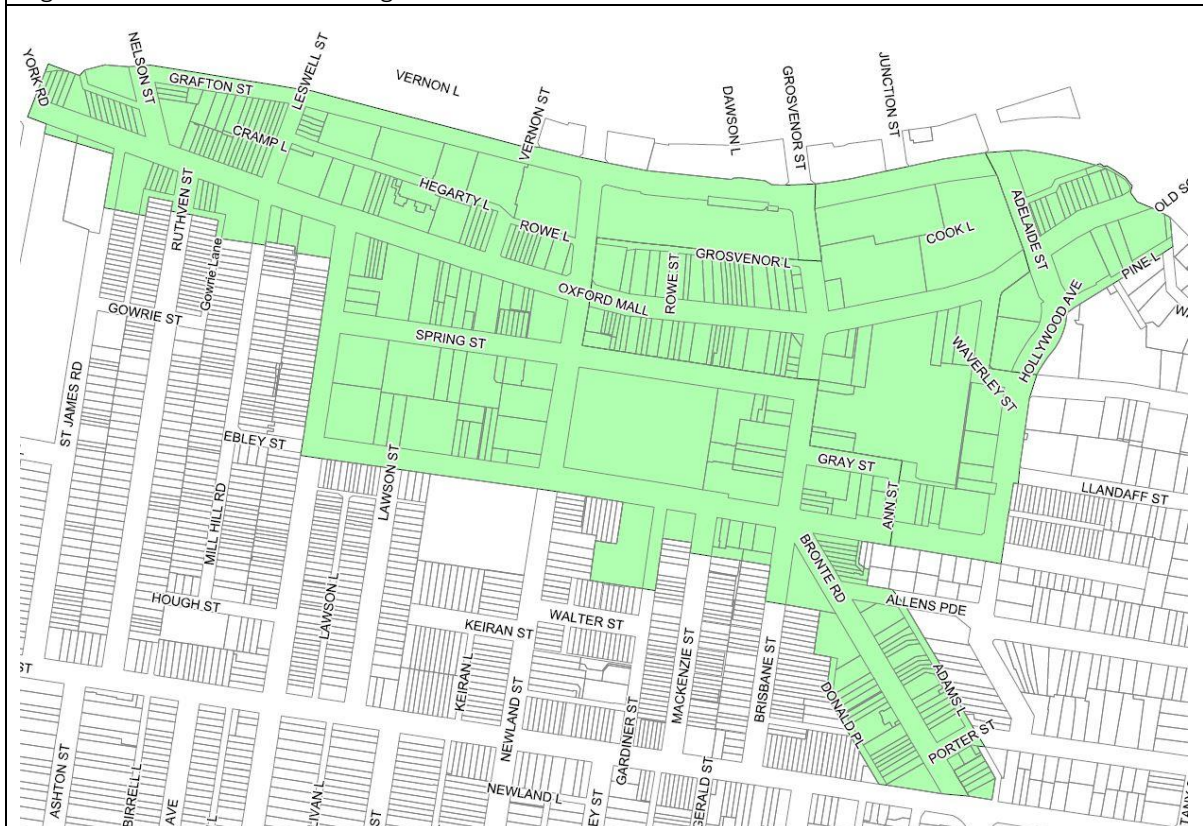
Bondi Junction Strategic Centre falls within the Waverley Local Government Area (LGA) and plays a key role in providing office, retail and health services to Sydney's Eastern Suburbs, as well as other employment and residential opportunities that allow people to live and work near the beach and city. Bondi Junction Strategic Centre is well connected to the Sydney CBD via the T2 Eastern Suburbs Train Line, and more broadly to the eastern region via numerous bus routes all accessible via the Bondi Junction Transport Interchange.

This Planning Proposal – Bondi Junction Strategic Centre - Protecting and promoting non-residential floor space (the Planning Proposal) explains the intent of, and justification for, the proposed amendments to Waverley Local Environmental Plan 2012 (WLEP).

Affected Land

This planning proposal applies to land zoned B4 Mixed Use and B3 Commercial Core within the area referred to as the 'Bondi Junction Strategic Centre,' which forms a part of the Waverley Local Government Area (LGA), shown in Figure 1 below. The planning proposal also applies to 122 Bronte Road, Bondi Junction which is currently zoned SP2 Infrastructure. 122 Bronte Road is currently the subject of a separate planning proposal to change the zoning of the site from SP2 Infrastructure to B4 Mixed Use. As the land is expected to be rezoned B4 Mixed Use it is important to ensure the provisions of this PP apply to this land as well. The 122 Bronte Road planning proposal received Gateway Determination in April 2020 and is expected to be gazetted by late 2020 and as such the land will be zoned B4 Mixed Use by the time this planning proposal is gazetted.

Figure 1. Bondi Junction Strategic Centre



The preparation of this Planning Proposal was guided by the findings and recommendations from a number of recent papers focusing on the importance of attracting and retaining commercial office

development in Bondi Junction including the *Bondi Junction Commercial Centre Review* (BJCCR) and the *Capturing the Growth Potential Research* conducted by .id. Furthermore, the priorities and actions of the *Eastern City District Plan* (District Plan), the *Waverley Local Strategic Planning Statement* (LSPS), and the *Waverley Community Strategic Plan* (CSP) provide the strategic context to justify why it is crucial to protect and promote non-residential floor space in Bondi Junction.

There has been a loss of approximately 9,000sqm of existing non-residential floor space in Bondi Junction as a result of recent residential developments since 2014.¹ There is forecast to be a further loss of 19,000sqm of existing non-residential floor space with current and recently approved DAs in the pipeline at the time of writing. This cumulative floor space loss represents between 580 and 1,300 jobs. Importantly, recent and potential developments have not only resulted in the loss of existing non-residential floor space but have also diminished non-residential floor space capacity in the B4 Mixed Use zone. This loss of real and potential non-residential floor space seriously hinders the availability of floor space for jobs, meaning that Waverley Council is at risk of not meeting the District Plan job targets and the role and function of Bondi Junction and its status as a Strategic Centre are under threat.

The District Plan job target range for Bondi Junction is between 17,000 and 20,500 jobs by 2036 from a base of 13,800 jobs in 2016. Given the loss of existing jobs in Bondi Junction as a result of the conversion of non-residential floor space to residential development, achieving the employment targets is a significant challenge that must be urgently addressed. This Planning Proposal seeks to address the loss of existing non-residential floor space and the loss of non-residential floor space capacity throughout Bondi Junction. A second phase Planning Proposal will be developed at a later stage that works toward increasing capacity where practical to achieve the employment targets in the District Plan, as well as encouraging employment generating and knowledge intensive and health related uses. This Planning Proposal reflects the Council Motion moved on 19 June 2018 as outlined below in Figure 2.

Figure 2: Council Minute supporting the creation of this PP.

NOTICE OF MOTION CM/8.11/18.06 Subject: Preserving Waverley's Commercial Spaces

That Council:

1. Recognises it must provide a minimum of 10,000 jobs in order to maintain its status as a Strategic Centre within the metropolitan centres hierarchy.
2. Recognises that Bondi Junction's 2016 job estimate is 13,800 jobs and that it is required to accommodate between 17,000 and 20,500 jobs forecast in the Eastern City District Plan by 2036.
3. Is concerned about the findings highlighted in the Bondi Junction Commercial Centre Review including:
 - a. The existing re-development of commercial office and retail into residential towers has already resulted in the loss around 10,000sqm of commercial floor space in recent years.
 - b. The conversion of commercial office space to build residential towers, which could entail the loss of 64,000sqm of floor space (around 2,500 jobs) in the longer term and 40,000sqm of floor space (around 1,600) in the short-term.
 - c. The limited sites remaining in the B3 Commercial Core zone for office-only development.
 - d. The development of non-office uses in the B3 zone such as serviced apartments.
 - e. Impact the lack of appropriate commercial space has on driving very high levels of commuting and the deleterious effects this has on the lifestyle of working residents.
 - f. Potential for a continued decline in local jobs on existing activity in the Junction and the prospect of it gaining momentum and triggering further decline.

¹ Bondi Junction Commercial Centre Review, 2017, Waverley Council.

4. Acknowledges the growing concern with the ever increasing push by developers to build higher buildings with limited setbacks that challenge LEP/DCP regulations and guidelines
5. Undertakes a review of the Waverley LEP as a matter of urgency to introduce protections for commercial buildings
6. Reports back to council as a matter of urgency.

The focus of this Planning Proposal is to achieve a greater employment outcome in the B4 Mixed Use and B3 Commercial Core zones, particularly focusing on employment generating and knowledge intensive jobs relating to office space, as well as health related uses. In the B4 Mixed Use zone, the proposed mechanism to achieve this is to require a minimum quantum of non-residential floor space to be provided in Bondi Junction to ensure local and district employment opportunities and local services are provided. This approach has been adopted by other Councils across Sydney and has been in the Waverley Development Control Plan 2012 (DCP) for some time. The definition of ‘non-residential’ is proposed to cover a broad range of employment generating uses, but would limit ‘serviced apartments’ and car parking to ensure the non-residential floor space better facilitates the employment aims for Bondi Junction. The exact development permissible in the non-residential floor space will be all development permissible in the B4 Mixed Use Zone excluding residential accommodation, tourist and visitor accommodation, self-storage units and carparking. Furthermore, the proposal seeks to limit ‘serviced apartments’ in the B3 Commercial Core zone to achieve a greater employment outcome.

Current Planning Controls

The current planning controls for the affected area is zoned B4 Mixed Use and B3 Commercial Core and SP2 Infrastructure. The B3 Commercial Core, B4 Mixed Use and SP2 Infrastructure land use tables are provided below in Figures 3, 4 and 5. It should be noted that the SP2 zoned site 122 Bronte Rd, Bondi Junction is currently subject to a separate Planning Proposal to rezone the site to B4 Mixed Use. Currently the DCP requires first floor as non-residential floor space in Bondi Junction, however this control has proven difficult to implement due to the competitive returns that residential development has attracted in the recent market.

Figure 3: Land Use Table – B3 Commercial Core

Zone B3 Commercial Core

1 Objectives of zone

- To provide a wide range of retail, business, office, entertainment, community and other suitable land uses that serve the needs of the local and wider community.
- To encourage appropriate employment opportunities in accessible locations.
- To maximise public transport patronage and encourage walking and cycling.
- To strengthen the role of the Bondi Junction Centre as a major commercial centre and ensure that commercial uses dominate.
- To provide direct, convenient and safe pedestrian links between the Bondi Junction bus concourse, rail station and Oxford Street Mall and reinforce the bus and rail interchange as a major passenger transport facility.

2 Permitted without consent

Nil

3 Permitted with consent

Building identification signs; Business identification signs; Centre-based child care facilities; Commercial premises; Community facilities; Educational establishments; Entertainment facilities; Function centres; Hotel or motel accommodation; Information and education facilities; Medical centres; Oyster aquaculture; Passenger transport facilities; Recreation facilities (indoor); Registered clubs; Respite day care centres; Restricted premises; Roads; Self-storage units; Tank-based aquaculture; Any other development not specified in item 2 or 4

4 Prohibited

Agriculture; Air transport facilities; Airstrips; Animal boarding or training establishments; Biosolids treatment facilities; Boat building and repair facilities; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Correctional centres; Crematoria; Depots; Eco-tourist facilities; Electricity generating works; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Heavy industrial storage establishments; Helipads; Highway service centres; Home-based child care; Home businesses; Home occupations; Home occupations (sex services); Industrial retail outlets; Industrial training facilities; Industries; Jetties; Marinas; Mooring pens; Moorings; Open cut mining; Pond-based aquaculture; Recreation facilities (major); Research stations; Residential accommodation; Resource recovery facilities; Rural industries; Sewage treatment plants; Signage; Storage premises; Transport depots; Truck depots; Vehicle body repair workshops; Vehicle repair stations; Warehouse or distribution centres; Waste disposal facilities; Water recreation structures; Water recycling facilities; Water supply systems; Wharf or boating facilities

Figure 4: Land Use Table - B4 Mixed Use

Zone B4 Mixed Use

1 Objectives of zone

- To provide a mixture of compatible land uses.
- To integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.
- To encourage commercial uses within existing heritage buildings and within other existing buildings surrounding the land zoned B3 Commercial Core.

2 Permitted without consent

Home occupations

3 Permitted with consent

Boarding houses; Building identification signs; Business identification signs; Centre-based child care facilities; Commercial premises; Community facilities; Educational establishments; Entertainment facilities; Function centres; Hostels; Hotel or motel accommodation; Information and education facilities; Light industries; Medical centres; Passenger transport facilities; Oyster aquaculture; Recreation facilities (indoor); Registered clubs; Respite day care centres; Restricted premises; Roads; Self-storage units; Seniors housing; Shop top housing; Tank-based aquaculture; Any other development not specified in item 2 or 4

4 Prohibited

Agriculture; Air transport facilities; Airstrips; Amusement centres; Boat building and repair facilities; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Crematoria; Depots; Eco-tourist facilities; Electricity generating works; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Heavy industrial storage establishments; Helipads; Highway service centres; Home occupations (sex services); Industrial retail outlets; Industrial training facilities; Industries; Jetties; Marinas; Mooring pens; Moorings; Open cut mining; Pond-based aquaculture; Recreation facilities (major); Research stations; Residential accommodation; Resource recovery facilities; Rural industries; Sex services premises; Signage; Storage premises; Transport depots; Truck depots; Warehouse or distribution centres; Waste disposal facilities; Water recreation structures; Water supply systems; Wharf or boating facilities

Figure 5: Land Use Table – SP2 Infrastructure

Zone SP2 Infrastructure

1 Objectives of zone

- To provide for infrastructure and related uses.

- To prevent development that is not compatible with or that may detract from the provision of infrastructure.

2 Permitted without consent

Nil

3 Permitted with consent

Aquaculture; Roads; The purpose shown on the [Land Zoning Map](#), including any development that is ordinarily incidental or ancillary to development for that purpose

4 Prohibited

Any development not specified in item 2 or 3

Proposed Amendments

This planning proposal seeks to amend the WLEP by creating a new Additional Local Provision to implement a minimum non-residential floor space provision to apply to the B4 Mixed Use zone, and to exclude serviced apartments from the B3 Commercial Core zone within Bondi Junction.

The key elements of this planning proposal are outlined below.

1. Change serviced apartments in the B3 Commercial Core land use table from a 'permitted with consent' use to a 'prohibited' use.
2. As the floor space to be protected is intended to be used for employment generating and knowledge intensive uses, an Additional Local Provision will be added that will apply to all B4 zoned land in the key sites map (see Part 4) that will ensure that in any new development there is no loss of the existing amount of non-residential floor space on the site. As 122 Bronte Road, Bondi Junction is in the process of being rezoned from SP2 Infrastructure to B4 Mixed Use it is intended that this provision will apply to this site when the Planning Proposal is finalised and gazetted. The Additional Local Provision will also not allow development for the purposes of residential accommodation, tourist and visitor accommodation and self-storage units in the floor space to be identified as non-residential. Commercial car parks will also not be included within the non-residential floor space as the space is intended to be used for employment generating and knowledge intensive uses. It should also be noted that, in line with the Standard Instrument LEP's definition of gross floor area, ancillary car parking will not be included in the floor space either. This clause will apply to both new developments and developments for alterations and additions to existing buildings. An explanation of how the Additional Local Provision will operate is located in Section 2.1.3 of this report.

No changes to the base floor space ratio or height of building is proposed as part of this Planning Proposal.

Preparation of this Planning Proposal

This Planning Proposal has been prepared in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979* (the Act), the *Standard Instrument – Principal Local Environmental Plan* (Standard Instrument) and guidelines published by the Department of Planning and Environment (DPE), including *A guide to preparing planning proposals* and *A guide to preparing local environmental plans*.

BACKGROUND

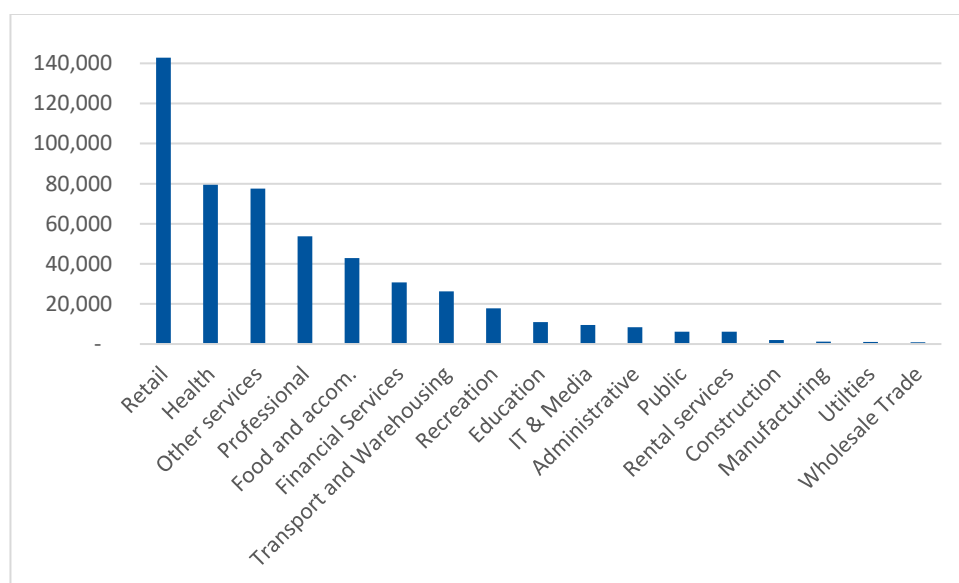
This planning proposal relates to the Bondi Junction Strategic Centre. Bondi Junction's role as a regional centre is underscored by its mix of retail, hospitality and entertainment services as well as commercial office market presence. The centre plays an important role providing space for the Eastern Suburbs office market, with health being one of the larger sectors occupying office space.

The need for the Planning Proposal

Employment Profile

Non-residential floor space in Bondi Junction is dominated by retail and food services, followed by health and professional industries (Figure 6).

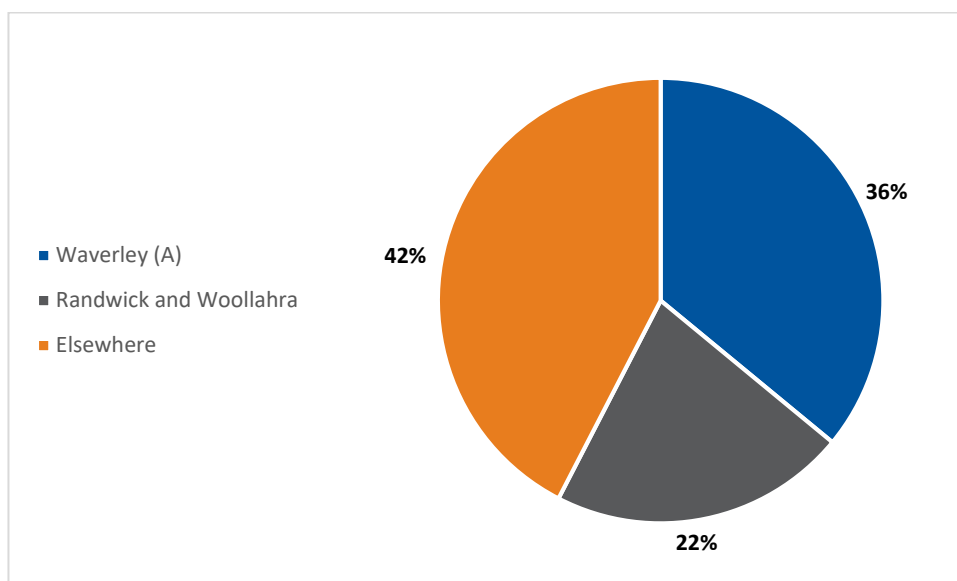
Figure 6 – Floor space by ANZSIC (Business Establishments)



Source: SGS Economics and Planning, 2015.

Almost two-thirds of workers within Waverley (data for Bondi Junction was not available) live outside of the LGA, with more than one-fifth of workers coming from neighbouring LGAs of Randwick and Woollahra (Figure 7). Assuming that the majority of these workers are located in Bondi Junction, this evidence suggests that the centre plays a significant role in providing jobs for a broader catchment than just the Waverley LGA. By encouraging additional jobs for local and neighbouring residents Bondi Junction reduces the need for local users to travel and thereby reduces commutes and associated emissions. Furthermore, providing more services in Bondi Junction reduces the need for nearby residents to travel further to access services.

Figure 7 – Residential location of Waverley workers



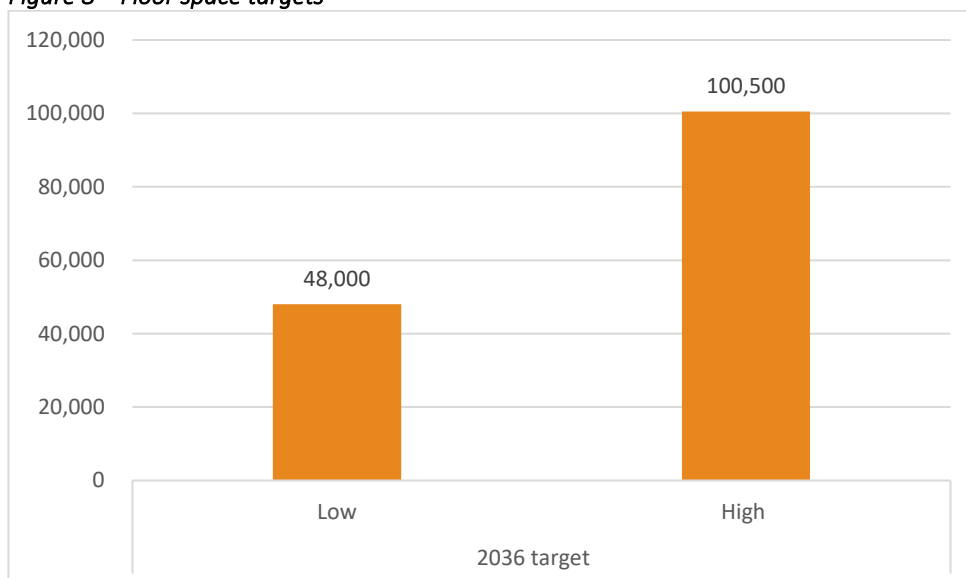
Source: CityScope, 2016; Waverley Council, 2016.

Employment targets and floor space demand

The District Plan sets a baseline target of 17,000 jobs to a higher target of 20,500 jobs by 2036. Using the existing employment figure in the District Plan of 13,800, this implies an increase of between 3,200 and 6,200 jobs. Based on an average of 15sqm per job, between 50,000 and 100,000 square metres of floor space is required to meet the District Plan job targets. Importantly, this increase would have to be in addition to any loss of floor space that has occurred or is likely to occur in Bondi Junction since 2016.

The ratio of 15sqm/job has been employed throughout this modelling and report for consistency, and the rate offers a mid-point between the existing Bondi Junction average derived from the Bondi Junction Floor Space Survey (2015) which is higher due to Education, Retail and Health Services (23 jobs/sqm) and the lower rate of office floor space (10 jobs/sqm).

Figure 8 – Floor space targets



Source: GSC, 2018; Waverley Council, 2018.

Floor space supply and capacity

As indicated above, a loss of existing floor space supply and potential floor space capacity present a significant challenge to accommodate future employment targets and demand for Bondi Junction. These related issues are explored in further detail below.

Loss of existing supply

Using data from current and approved Development Applications (DA) in the last 5 years, Table 1 documents the loss of existing non-residential floor space supply in Bondi Junction as a result of new residential towers replacing existing floor space. In some instances, these DAs have replaced a traditional ground floor retail and first floor office configuration, which typically have a high floor space efficiency / coverage, with a residential tower that contains a tokenistic retail use at ground floor. More concerning however is the loss of larger commercial office towers in Bondi Junction to residential conversion. Research in Randwick demonstrated that only around 27% of the ground floor is used for non-residential floor space. Woollahra and Randwick are also experiencing this same issue in their centres and both Councils are seeking to implement a minimum non-residential floor space in selected areas.

This loss of floor space can be understood as around 580 jobs lost in the last few years based on the job density of 15sqm/job. The continued loss of employment to residential accommodation is expected to continue due to the higher returns for residential development and Development Applications for new residential apartment towers at existing large scale commercial sites.

	Pre-development floor space	Redevelopment floor space	Floor space loss	Job loss equivalent
Recent approvals	15,272	6,601	8,671	578
Development application	22,438	3,123	19,315	1,288
Total	37,710	9,724	27,986	1,866

Table 2 demonstrates the actual non-residential floor space that has been delivered as part of recent developments. Of this development pipeline, the average non-residential floor space that has been provided is 53%. This is low and as a result reflects the large cumulative loss of non-residential floor space. For the two smaller sites at 58 and 78 Bronte Road that have been subject to redevelopment, the non-residential floor space delivered on these sites has been 200%, suggesting that these sites have been redeveloped for commercial purposes.

Site	Actual non-residential floor space (percentage of entire floor space)
253-255 Oxford	11%
109-119 Oxford Street	59%
87-99 Oxford Street	53%
110-116 Bronte Road	16%
243 Oxford Street	36%

Table 2 – Actual non-residential floor space percentages in Bondi Junction: recent development	
Site	Actual non-residential floor space (percentage of entire floor space)
28-34 Bronte Road	134%
292-302 Oxford Street	34%
304-308 Oxford Street	10%
344-354 Oxford Street	99%
362-374 Oxford Street	32%
55 Grafton Street	15%
552-568 Oxford Street	82%
570-588 Oxford Street	50%
58 Bronte Road	198%
59-69 Oxford Street	41%
59-75 Grafton Street	41%
78 Bronte Road	206%
Average	53%
Average - large sites	50%
Average - small sites	202%

Similarly, a number of recently completed and under construction residential mixed use towers have serviced apartments on the lower floors, directly above ground level as these levels could not achieve SEPP 65 requirements. It is anticipated that these will simply function as ‘build to rent’ residential apartments and a missed opportunity has occurred where these sites could have provided commercial non-residential floor space.

Importantly, the Bondi Junction Commercial Centre Review predicted a loss of around 64,000sqm of non-residential floor space resulting from the changes to the Waverley LEP 2012, which rezoned much of the B3 Commercial Core into a B4 Mixed Use zone. So far recent approvals and Development Applications have revealed a loss of close to 30,000sqm of floor space. There is potential that another 34,000sqm of non-residential floor space could be lost through the further loss of existing floor space.

Capacity within the existing controls

Using *Bondi Junction Floor Space Study* data, an analysis of Bondi Junction’s ability to absorb future floor space growth was completed. Two different capacity scenarios were analysed to provide a detailed understanding of Bondi Junction’s potential to accommodate future employment growth within the B3 Commercial Core zone.

Table 3 shows the largest remaining sites within Bondi Junction’s B3 Commercial Core zone. It is important to highlight that the majority of non-residential floor space capacity within Bondi Junction is within the Westfield site; which has theoretical capacity for an additional 54,000sqm. Therefore, much of the future type of non-residential floor space development in Bondi Junction depends on the intentions and willingness of Westfield to further expand their centre. This is a risk for future office development in Bondi Junction, given that around 50 percent of the capacity for future non-residential floor space in Bondi Junction depends on a sole operator, which specialises in retail development, rather than office development. The two office towers on the Westfield site were developed in 1979 and 1988; each associated with major expansions of the shopping centre. Westfield has indicated to Council that the part of Westfield where the 54,000sqm of capacity remains (south of Oxford Street)

cannot be retrofitted for an office tower. They indicated that they have no intentions to develop an additional office tower and potential disruption to their high performing shopping centre.

Beyond the Westfield site the second largest development opportunity is the cluster of four sites between the Waverley Mall and Westfield – 235-239 Oxford Street. There have been numerous inquiries to develop these sites as student accommodation, which may be possible as non-complying ‘serviced apartments’ or a ‘hotel or motel accommodation’ land use in the B3 zone. After this site, a cluster of Ebley Street sites present the second largest commercial office development opportunity. The Ebley Street sites are currently subject to a Planning Proposal which, after amendments, will protect their commercial development capacity. The site of 5-11 Hollywood Avenue is being redeveloped by an established student accommodation provider as a ‘hotel or motel accommodation’. 6-8 Bronte Road is currently being redeveloped into a five storey commercial office building with approximately 1,400sqm of floor space; demonstrating that the commercial capacity numbers represent an upper limit on future floor space delivery. The B3 Commercial Core zone for the western section of Oxford Street (surrounding the mall) is highly fragmented and hence there is limited capacity in this area. Any sites that are unlikely to redevelop have been discounted and noted in Table 3.

Table 3 – Large sites in B3 Commercial Core zone		
Address	Floor space capacity (sqm)	Comments
480-510 Oxford Street	53,916	Westfield – unlikely to develop - discounted .
235-239 Oxford Street	11,099	Interest as student accommodation
96-100, 110-122 Ebley Street	7,281	Subject to PP
213 Oxford Street	5,128	Apple Store
4a Bronte Road	4,635	Heritage pub – discounted .
183 Oxford Street	4,297	
5-11 Hollywood Avenue	4,235	DA for student accommodation – discounted .
22-26 Bronte Road	3,640	Strata - discounted
231 Oxford Street	3,259	
6-8 Bronte Road	2,095	Redeveloped

Under an optimistic ‘theoretical capacity’ scenario of the B3 Commercial Core there is approximately 111,000sqm of floor space capacity. Discounting key sites that aren’t likely to be redeveloped – including Westfield – reduces capacity by 66,000sqm to resulting in a likely non-residential floor space capacity of around 45,000sqm (Table 4).

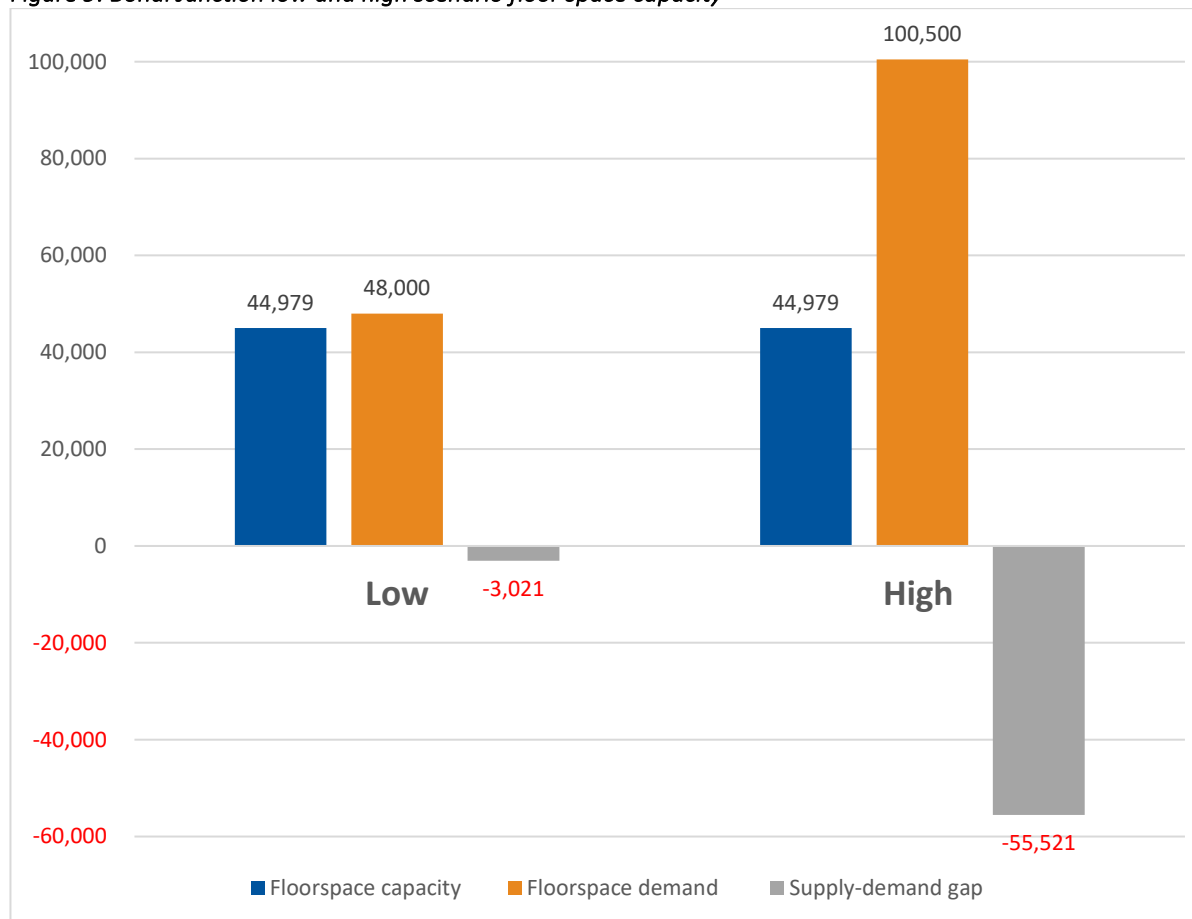
As outlined above (Table 1), the loss of non-residential floor space from recent development and the development pipeline is 28,000sqm, with a potential future loss of up to 64,000sqm as outlined in the BJCCR. If this loss and potential loss of floor space is taken into account then the capacity would more closely reflect 17,000sqm (discounted capacity: 45,000sqm – 28,000sqm) or even negative 19,000sqm (discounted capacity: 45,000sqm – 64,000sqm). This floor space loss trend is supported by the evidence of similar losses of non-residential floor space within the North Shore office market and across Strategic Centres in Metropolitan Sydney.

Table 4 – Bondi Junction capacity analysis	
Floor space scenarios	Floor space capacity (sqm)
Theoretical capacity	111,405
Likely capacity	44,979

Supply-demand gap

The floor space capacity figures have been modelled against the floor space demand figures based on the low and high employment projections in the District Plan. Using the 'likely capacity' figure of 45,000sqm, by 2036 there will be a shortage of non-residential floor space of 3,000sqm under the 'low' floor space (job) target required by the District Plan. Under the 'high' scenario there would be a shortage of approximately 55,000sqm of floor space. Neither of these scenarios account for the loss of a predicted 28,000sqm of floor space in the immediate pipeline. If this loss is accounted for then there is potentially a shortage of up to 83,000sqm of non-residential floor space in Bondi Junction by 2036.

Figure 9: Bondi Junction low and high scenario floor space capacity



PART 1 – OBJECTIVES OR INTENDED OUTCOMES

1.1 Description Statement

This planning proposal seeks to amend the WLEP by creating a new Additional Local Provision to implement a minimum non-residential floor space provision to apply to the B4 Mixed Use zone, and to exclude serviced apartments from the B3 Commercial Core zone within Bondi Junction.

The key elements of this planning proposal are outlined below.

1. Change serviced apartments in the B3 Commercial Core land use table from a 'permitted with consent' use to a 'prohibited' use.
2. As the floor space to be protected is intended to be used for employment generating and knowledge intensive uses, an Additional Local Provision will be added that will apply to all B4 zoned land in the key sites map (see Part 4) that will ensure that in any new development there is no loss of the existing amount of non-residential floor space on the site. As 122 Bronte Road, Bondi Junction is in the process of being rezoned from SP2 Infrastructure to B4 Mixed Use it is intended that this provision will apply to this site when the Planning Proposal is finalised and gazetted. The Additional Local Provision will also not allow development for the purposes of residential accommodation, tourist and visitor accommodation and self-storage units in the floor space to be identified as non-residential. Commercial car parks will also not be included within the non-residential floor space as the space is intended to be used for employment generating and knowledge intensive uses. It should also be noted that, in line with the Standard Instrument LEP's definition of gross floor area, ancillary car parking will not be included in the floor space either. This clause will apply to both new developments and developments for alterations and additions to existing buildings. An explanation of how the Additional Local Provision will operate is located in Section 2.1.3 of this report.

No changes to the base floor space ratio or height of building are proposed.

1.2 Intended Outcomes

There are two separate but related issues currently undermining the commercial role of Bondi Junction. One is the loss of existing non-residential floor space through redevelopment to provide an increased quantum of residential development, and the other is the loss of non-residential floor space capacity through redevelopment to land uses that do not provide significant non-residential floor space, such as serviced apartments. The issue will be addressed through two Planning Proposals, which will address the issues as follows:

- Planning Proposal 1 (this Planning Proposal) – Maintain Existing Floor space:
 - No loss of existing non-residential floor space in the B4 Mixed Use zone
 - No loss of existing non-residential floor space capacity in the B3 Commercial Core zone
- Planning Proposal 2 – Grow Floor space Capacity:
 - Create capacity for additional non-residential floor space in the B4 Mixed Use zone

The implementation of Planning Proposal 1 seeks a replacement of any non-residential floor space within redevelopments to ensure a truly mixed-use outcome. This is proposed to be achieved via an Additional Local Provision. The protection of non-residential floor space capacity in the B3 zone is also critical, especially as there are only a handful of sites that are likely to be redeveloped in the near future.

To deliver a 30 Minute City in line with the Region Plan, and to deliver the key District Plan objective to increase 'employment generating and knowledge intensive' employment and retain Bondi Junction as

a Strategic Centre, the limiting of quasi-residential uses that generate little employment to the B4 Mixed Use zone – such as serviced apartments – is necessary. These land uses have been demonstrated to compete for key sites with higher employment yielding ‘employment generating and knowledge intensive’ jobs and therefore serviced apartments should be limited to the B4 Mixed Use zone, and not be counted towards the non-residential floor space of a development or redevelopment.

These above approaches aim to retain the existing non-residential floor space in Bondi Junction, but would not assist in achieving the 2036 job targets for Bondi Junction or compensate the loss of 28,000sqm of floor space from recent development. Therefore, Planning Proposal 2 will be developed at a later stage that aims to increase capacity to achieve the employment targets in the District Plan.

The objectives and outcomes of the proposed amendment to the WLEP are:

- To ensure that Bondi Junction Strategic Centre can continue to perform a key role in the Eastern Suburbs through a diverse offering of retail, knowledge-economy office space, and health-focussed businesses.
- To retain the existing amount of non-residential floor space in all developments in the Bondi Junction Strategic Centre.

1.3 Intended controls

To create a new Additional Local Provision which requires that all development on B4 Mixed Use zoned land in Bondi Junction (identified on the Key Sites Map) provides ‘no net loss’ of non-residential floor space on site. As discussed throughout this report, the land at 122 Bronte Road, Bondi Junction is also identified as part of this PP. The calculation of this floor space would exclude residential accommodation, tourist and visitor accommodation, self-storage units and car parking, but include horizontal circulation and storage space that directly services or is associated with the non-residential floor space. A full explanation of how the Additional Local Provision will operate is located in Section 2.1.3 of this report.

Planning Proposal 2 will address increasing non-residential floor space within Bondi Junction, above the ‘no net loss’ provision.

1.4 Similar controls of other Sydney councils

Planning controls intended to promote a mix of residential, community and employment generating uses in centres are common across LEPs in Greater Sydney. Different approaches have been used by councils to best reflect the scale of individual centres, their context, and their desired future character. The main approaches taken are:

- FSRs that mandate land use mix,
- Height and FSR incentives to promote certain land uses,
- Active street frontage provisions,
- Centre specific local provisions for key sites and centres.

The following Greater Sydney councils set a minimum non-residential FSR for business zoned land in centres or key sites:

- Parramatta
- Cumberland (formerly Holroyd)
- Hornsby
- Lane Cove
- North Sydney.

Other approaches to support non-residential uses include FSR incentive clauses and FSRs to mandate a mix of specific uses on certain sites. Several councils have expressed controls as a percentage of gross floor area or minimum area FSR.

Another approach taken to maintain non-residential uses in centres is a special local clause requiring ground and first floors to be developed only for non-residential uses. This is used by the following councils:

- Blacktown
- Ku-ring-gai
- Cumberland/Holroyd
- Warringah
- Bankstown
- Campbelltown
- Woollahra

It is considered that the proposed amendments of this Planning Proposal achieve the immediate need to preserve existing floor space, and that the proposed amendments in Planning Proposal 2 will be generally consistent with these existing approaches taken by other Greater Sydney councils.

PART 2 – EXPLANATION OF PROVISIONS

This planning proposal seeks to amend the WLEP as it applies to the Bondi Junction Strategic Centre land zoned B3 Commercial Core and B4 Mixed Use as described below. The following amendments would need to be legally drafted and included within the WLEP.

2.1 Draft Development Standards

A draft of the development standard is provided below.

2.1.1 Update the B3 Commercial Core Land Use Table

Move Serviced Apartments from 'Permitted with consent' to 'Prohibited' in the B3 Commercial Core land use table.

3 Permitted with consent

Building identification signs; Business identification signs; Centre-based child care facilities; Commercial premises; Community facilities; Educational establishments; Entertainment facilities; Function centres; Information and education facilities; Medical centres; Oyster aquaculture; Passenger transport facilities; Recreation facilities (indoor); Registered clubs; Respite day care centres; Restricted premises; Roads; Self-storage units; Tank-based aquaculture; Any other development not specified in item 2 or 4

4 Prohibited

Agriculture; Air transport facilities; Airstrips; Animal boarding or training establishments; Biosolids treatment facilities; Boat building and repair facilities; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Correctional centres; Crematoria; Depots; Eco-tourist facilities; Electricity generating works; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Heavy industrial storage establishments; Helipads; Highway service centres; Home-based child care; Home businesses; Home occupations; Home occupations (sex services); Industrial retail outlets; Industrial training facilities; Industries; Jetties; Marinas; Mooring pens; Moorings; Open cut mining; Pond-based aquaculture; Recreation facilities (major); Research stations; Residential accommodation; Resource recovery facilities; Rural industries; Sewage treatment plants; **Serviced Apartments**; Signage; Storage premises; Transport depots; Truck depots; Vehicle body repair workshops; Vehicle repair stations; Warehouse or distribution centres; Waste disposal facilities; Water recreation structures; Water recycling facilities; Water supply systems; Wharf or boating facilities

2.1.2 Additional Local Provision

Draft a new Additional Local Provision as follows:

1. As the floor space to be protected is intended to be used for employment generating and knowledge intensive uses, an Additional Local Provision will be added that will apply to all B4 zoned land in the key sites map (see Part 4) that will ensure that in any new development there is no loss of the existing amount of non-residential floor space on the site. As 122 Bronte Road, Bondi Junction is in the process of being rezoned from SP2 Infrastructure to B4 Mixed Use it is intended that this provision will apply to this site when the Planning Proposal is finalised and gazetted. The Additional Local Provision will also not allow development for the purposes of residential accommodation, tourist and visitor accommodation and self-storage units in the floor space to be identified as non-residential. Commercial car parks will also not be included within the non-residential floor space as the space is intended to be used for employment generating and knowledge intensive uses. It should also be noted that, in line with the Standard Instrument

LEP's definition of gross floor area, ancillary car parking will not be included in the floor space either. This clause will apply to both new developments and developments for alterations and additions to existing buildings. An explanation of how the Additional Local Provision will operate is located below in Section 2.1.3 of this report.

2.1.3 Operation of the Additional Local Provision

Council will calculate and verify the amount of existing floor space to be retained by requiring floorplans of existing buildings on site with any development application lodged, these could be certified by a surveyor or assessing officer. Council also has records of the floorspace audit done in Bondi Junction so there is existing floorspace estimates for the remaining developable sites in Bondi Junction to verify the existing floor space to be retained.

In the case of redeveloping buildings with non-residential floor space that has been vacant, the use prior to vacancy would be considered. If the space was never occupied from the time it was built this would still be considered as non-residential floorspace (assuming it wasn't an apartment or residential use etc.) For example, if a large space sat unoccupied from when it was developed but it was approved for non-residential purposes on the approved plans it is reasonable to assume that the vacant space is not residential floorspace.

This provision would allow for interchangeable non-residential uses (with the exception of serviced apartments). For example, office space may replace retail, medical centre may replace office etc. Whilst different non-residential uses may have differing employment generation capacities, they still would generate much higher employment numbers than residential and quasi residential uses. Given the profitability and certainty of residential development for developers it is difficult for non-residential uses such as health uses to compete. By mandating a non-residential floor space provision, Council is providing a greater opportunity for services such as health related uses in the future, ensuring that existing opportunities are not eroded as it has been when non-residential floor space is lost in redevelopments.

2.1.4 Maps

Planning Proposal 1 seeks to refer to the Key Sites Map for Bondi Junction to impose the Additional Local Provision noted above.

PART 3 – JUSTIFICATION

Section A – Need for the planning proposal

This section establishes the need for a planning proposal in achieving the key outcomes and objectives. The set questions address the strategic origins of the proposal and whether amending the WLEP is the best mechanism to achieve the aims of the proposal.

3.1. Is the planning proposal a result of any strategic study or report?

A number of existing strategies were used to inform this planning proposal, as well as new technical studies and modelling scenarios, as follows:

- *Bondi Junction Strategic Plan Economic Overview*, prepared by Leyshon Consulting in 2004
- *Bondi Junction Urban Design Review*, prepared by City Plan Urban Design in 2013
- *Waverley Economic Development Strategy*, prepared by Waverley Council in 2015
- *Bondi Junction Floor Space Study*, prepared by SGS in 2016
- *Bondi Junction Heartbeat of the East*, prepared by Waverley Council in 2016
- *Bondi Junction Commercial Centre Review*, prepared by Waverley Council in 2017
- Scenario modelling prepared by Waverley Council, including:
 - A revised baseline of non-residential floor space in 2018 based on development approvals and applications to determine what has been lost since 2016 (SGS baseline)
 - The remaining capacity for non-residential floor space under the current controls

The research and technical studies undertaken and the recommendations of each are discussed below.

3.1.1 *Bondi Junction Commercial Centre Review*

In 2017 the *Bondi Junction Commercial Centre Review* (BJCCR) was prepared by Council. The study outlines the history of commercial development in Greater Sydney and Bondi Junction, the changing nature of the economy, and the consequences of these changes on the Bondi Junction. The report provides an evidence base that finds the erosion of commercial floor space within Bondi Junction has occurred due to:

- the rezoning of a large proportion of the centre to B4 Mixed Use in Amendment 2 to the WLEP 2012, and
- the rapid and recent increase in the value of residential development compared to commercial development.

The key recommendations of the BJCCR are to:

1. **Protect the B3 Commercial Core zone from any future rezoning** – The B3 Commercial Core zoning is used within the Bondi Junction Strategic Centre to focus on providing the provisions for employment and services of the wider regions and the local community. This zoning provides for solely commercial based uses to protect the employment floor space within the centre from residential uses. Rezoning the B3 Commercial Core zoned land creates the possibility of losing commercial floor space to be replaced with residential floor space.
2. **Implement a minimum non-residential floor space in the B4 zone** – To ensure that an employment future in Bondi Junction is secured, Council should implement a centre-wide application of a minimum non-residential floor space to Bondi Junction in the existing zoned B4 Mixed Use zone. This requirement should seek to ensure no net loss of non-residential floor space at a minimum and where possible an increase on existing provision of non-residential

floor space.

3. **Prohibit serviced apartments in the B3 and as part of any minimum non-residential floor space** – To ensure an office outcome in the B3 zone, serviced apartments should be prohibited in this zone. To support the minimum non-residential floor space control in the B4 zone Council should prohibit serviced apartments applying to the non-residential component of floor space.
4. **Consider allowing differential controls for office development in the B4 zone** – Similar to the City of Sydney, consider changing the FSR and height controls to favour office development in the B4 zone. This could include merit assessment of these developments.
5. **Consider applying incentives for office development in the B4 zone** – To encourage further office development above and beyond the non-residential floor space, additional FSR and height could be allowed as an incentive / trade-off; subject to merit assessment.
6. **Identify future areas for residential growth to reduce conflict with commercial** – In the short-term, there are sufficient sites within existing residential zones and the B4 zone to supply residential development. Beyond this, Council could investigate whether low density areas adjacent to Bondi Junction could accommodate greater residential supply.

This Planning Proposal aims to address Recommendation 2 and part of Recommendation 3 of the BJCCR by implementing a minimum non-residential floor space provision in the B4 Mixed Use Zone and limiting serviced apartments in the B3 Commercial Core zone within Bondi Junction. The BJCCR is contained in Appendix 1.

3.1.2 *Bondi Junction Strategic Plan Economic Overview*

The *Bondi Junction Strategic Plan Economic Overview* was completed by Leyshon Consulting in 2004 to inform the strategic planning framework for Bondi Junction. The report provided the following recommendations for Bondi Junction:

- Council should consider identifying the remaining prime commercial sites in the Bondi Junction centre and re-evaluate the planning controls which relate to those sites so as to give preference to commercial rather than residential development.
- It is recommended that Council give consideration to adopting a strategy specifically designed to protect future opportunities for commercial development in Bondi Junction as well as providing some incentives to encourage commercial development and redevelopment in the centre.
- In relation to the former objective, it is recommended that Council should identify those sites within the Bondi Junction centre with high potential value for office development and take action to ensure they are not 'lost' to residential projects.
- It is recommended that Council consider implementing a review of the floor space ratios which apply to commercial and residential development in the centre generally to ensure a sufficient disparity exists in favour of the former.

3.1.3 *Bondi Junction Urban Design Review*

In 2012, Council and the DPE jointly commissioned the *Bondi Junction Urban Design Review* (BJUDR) prepared by City Plan to address site specific items as well as matters relating to generic controls in Bondi Junction. Following consultation with landowners, recommendations from the BJUDR were incorporated as amendments to the WLEP. The amendments aimed to facilitate development in the short-term to “stimulate the local economy and provide jobs and business opportunities sooner rather than later.”

3.1.4 Waverley Economic Development Strategy

Waverley Council developed its first Economic Development Strategy in 2015. The *Waverley Economic Development Strategy 2015-2020* (WEDS) focuses on retaining existing business and attracting new business that support the creation of local jobs and investment. The WEDS outlines a series of strategic directions and actions to strengthen the Waverley economy and cement Bondi Junction's role as the "economic heartbeat of the Eastern Suburbs."

Four high level priorities and nine actions are included in the Strategy, namely:

- Renew – destination marketing, place management and destination development
- Innovate – improving competitiveness and increasing diversity
- Collaborate – industry partnerships and government partnerships
- Enable – reducing barriers and business support.

Some actions from the WEDS that are pertinent to Bondi Junction are:

- Identify and promote clear branding that highlights the character of Bondi Junction and key commercial village centres
- Promote Waverley's competitive advantage to attract new business
- Encourage investment in the sustainable supply of commercial office space
- Investigate the establishment of co-working office spaces for existing industries including employment generating and knowledge intensive (professional services).

3.1.5 Capturing the Growth Potential Report

The report prepared by .id (August 2018) for Waverley Council suggests that a potential option for Waverley Council is to provide incentives for the use of co-working spaces within the B3 Commercial Core zone. The report identifies Waverley as a suitable area for co-working spaces due to its central location and positioning to the Bondi Junction train station and bus terminal making it an easily accessible location. Council owned buildings such as the Office Works and Spotlight sites mean there is good opportunity for Council to invest in this type of commercial office space modelling.

The report suggests that this type of office space will help to address the major shortfall in local professional jobs or respond to the specialisation of professionals in the Waverley area and their business space needs.

3.1.6 Bondi Junction Floor Space Study

In 2016 Waverley Council commissioned SGS Economics and Planning (SGS) to complete the *Bondi Junction Floor Space Study* (BJFS) to collate floor space and employment data for Bondi Junction. The project was commissioned to better understand the current and future floor space demands and provide a baseline data set for evidence based planning.

The survey identified 517,500sqm of employment floor space in Bondi Junction and 330,000sqm residential floor space. The study included a high level capacity assessment. The results of the capacity assessment had limitations and a new, more detailed capacity assessment was completed as part of the BJCCR in 2017.

3.2 Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

Yes, a planning proposal seeking to amend the WLEP is the most effective means of achieving the intended outcome and providing certainty for Council, the community and landowners. The provisions will provide Council with a statutory provision to require a minimum amount of non-residential floor space within the Bondi Junction Strategic Centre only.

The existing controls encourage non-residential development but do not provide Council effective means to require it. As a result, many of the existing non-residential buildings in the centre are being demolished and replaced with ‘shop-top housing’ which will often provide a nominal amount of ground floor retail or commercial, and in rare cases first floor commercial, with large residential accommodation above.

These developments are partially contributing to the ground level activation of the Centre, which is important in and of itself, however dimensions of any first floor commercial offerings are often small, tokenistic and not attractive to medium-large sized businesses.

Section B – Relationship to strategic planning framework.

This section assesses the relevance of the planning proposal to the directions outlined in key strategic planning policy documents. Questions in this section consider state and local government plans including the Region Plan, the District Plan, State Environmental Planning Policies, local strategic and community plans and applicable Ministerial Directions.

3.3 Is the planning proposal consistent with the objectives and actions of the applicable regional or sub-regional strategy (including the Greater Sydney Region Plan and exhibited draft strategies)?

Does the proposal have strategic merit? Is it:

- *Consistent with the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment; or*
- *Consistent with a relevant local council strategy that has been endorsed by the Department; or*
- *Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing planning controls.*

Yes, the Planning Proposal is crucial to Waverley Council achieving the actions of the Region Plan and the District Plan, specifically Directions *A well connected city* and *Jobs and skills for the city*, and Planning Priority E11, and Actions 46a and 46c. Without this planning proposal Council has no means by which to encourage or enforce non-residential development being delivered within the Bondi Junction Strategic Centre. To ensure that the centre does not dissolve into a retail precinct only but can continue to provide a key destination for knowledge and health workers in the Eastern Suburbs, Council must take action now to prevent further loss of employment lands to residential accommodation.

3.3.1 A Metropolis of Three Cities

The Greater Sydney Region Plan ‘A Metropolis of Three Cities’ (Region Plan) prepared by the NSW Government was finalised and released in March 2018, and sets forth the forty year vision to 2056 of a metropolis comprised of three cities, the Eastern Harbour City, the Central River City and the Western Parkland City, and the notion of a 30 minute city for the majority of Sydneysiders. The 30 minute city is the notion that most people should have access to their nearest metropolitan centre or cluster by public transport within 30 minutes; and where everyone can travel to their nearest strategic centre by public transport seven days a week to access jobs, shops and services. This is integral for economic competitiveness and will make Greater Sydney a more attractive place for investment, businesses and skilled workers.

This Planning Proposal gives effect to *A well connected city* and *Jobs and skills for the city*.

3.3.2 Eastern City District Plan

The *Eastern City District Plan* (District Plan) prepared by the NSW Government was finalised and released in March 2018, and outlines the strategy for the Eastern Harbour City, or the Eastern City

District, which includes Waverley Council. The District Plan identifies Bondi Junction as a Strategic Centre, and sets out specific job targets – a baseline target of 17,000 jobs and a higher target of 20,500 jobs by 2036 – and actions for the Centre (see Figure 2).

The District Plan describes Bondi Junction as a ‘high amenity centre providing retail and local services to Greater Sydney’s Eastern Suburbs,’ and acknowledges that ‘pressure for residential redevelopment is increasing across the centre.’ To ensure that Bondi Junction remains a key centre for employment, future growth will need to ensure the capacity for jobs growth and provide a diverse mix of uses across the centre.


Action 38 of the District Plan requires Councils to ‘Provide access to jobs, goods and services in centres’ and sub-action 38(l) specifically states that residential development in strategic centres should not occur ‘at the expense of the attraction and growth of jobs, retailing and services’. Action 43 of the District Plan applies to all Council’s and requires a ‘review the current planning controls and create capacity to achieve the job targets for each of the District’s strategic centres’. These actions provide a clear message that it is important to accommodate our job targets and that housing development should not jeopardise our ability to achieve these targets. More specifically Action 46 applies to Bondi Junction (Figure 2) and the following sub-actions are of most relevance to this Planning Proposal:

- *Action 46a: Strengthen Bondi Junction through approaches that protect capacity for job targets and a diverse mix of uses to strengthen and reinforce the economic role of the centre.*
- *Action 46c: Strengthen Bondi Junction through approaches that expand the centre’s function and type of land uses, and knowledge-intensive jobs.*

During consultation with the Greater Sydney Commission (GSC) Waverley Council identified and discussed the difficulties of retaining and increasing non-residential floor space within Bondi Junction, due to high land values in the area, and the more attractive financial returns for applicants on residential development. To meet Actions 38, 43, 46a and 46c of the District Plan, Council must implement a strategy to protect the existing non-residential floor space, and to grow the future supply of non-residential floor space, within Bondi Junction.

Figure 11 – District Plan Actions and Job Targets

Bondi Junction		Jobs
2016 estimate		13,800
2036 baseline target		17,000
2036 higher target		20,500

 Actions	Responsibility
<p>46. Strengthen Bondi Junction through approaches that:</p> <ul style="list-style-type: none"> a. protect capacity for job targets and a diverse mix of uses to strengthen and reinforce the economic role of the centre b. consider potential options for future public transport connections to the south east of the District to accommodate forecast population and employment growth, and better connect the District c. expand the centre's function and type of land uses, and knowledge-intensive jobs d. improve access from the centre of Bondi Junction to nearby open space and recreation facilities such as Queens Park, Centennial Park, Moore Park and Bondi Beach e. recognise the centre's health attributes to support the Randwick health and education precinct and mechanisms for increasing floor space for health uses, including a health-focused business incubator f. investigate opportunities to improve and diversify night-time economy offerings g. promote place making initiatives to improve the quality of public spaces. 	Waverley Council, other planning authorities and State agencies

Source: Greater Sydney Commission

3.3.3 Strategic and Site Specific Merit Test

The 'Guide to Preparing Planning Proposals' outlines two merit tests that the proposal should be assessed against. The proposal is consistent with the Strategic Merit Test and the Site Specific Merit Test outlined in Tables 5 and 6 below.

Table 5 - Strategic Merit Test	
a) Does the proposal have strategic merit? Is it:	
Consistent with the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or	<p>Yes, this Planning Proposal is of critical importance and has strategic merit not only for Waverley LGA, but for the whole of the Eastern District.</p> <p>To deliver jobs and services within 30-minutes for residents in the Eastern District, Bondi Junction Strategic Centre plays a critical role. Accordingly this Planning Proposal seeks to ensure no further loss of non-residential floor space.</p>

corridor/precinct plans released for public comment; or	
Consistent with a relevant local council strategy that has been endorsed by the Department; or	Yes, this Planning Proposal is consistent with the recently endorsed Waverley Local Strategic Planning Statement.
Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing planning controls.	Yes, this Planning Proposal is responding to a recent trend of prioritising residential development at the cost of non-residential development. This has not been accounted for in the planning controls, and as a result, the limited opportunities for redevelopment in Bondi Junction have resulted in a loss of non-residential floor space in favour of residential accommodation for short term financial gains.
Table 6 - Site-specific Merit Test	
b) Does the proposal have site-specific merit, having regard to the following:	
The natural environment (including known significant environmental values, resources or hazards); and	This Planning Proposal does not directly impact the natural environment, as there is no proposed increase in density to the area.
The existing uses, approved uses, and likely future uses of land in the vicinity of the proposal; and	The Planning Proposal has site specific merit with regard to the existing and desired future uses of land within the Bondi Junction Strategic Centre. The future of the success of Bondi Junction as a Strategic Centre relies on the retention and growth of non-residential floor space.
The services and infrastructure that are or will be available to meet the demands arising from the proposal; and	The Planning Proposal does not increase the built form of the Bondi Junction Strategic Centre.
Any proposed financial arrangements for infrastructure provision.	The Planning Proposal does not increase the built form of the Bondi Junction Strategic Centre.

3.4 Is the planning proposal consistent with a council's local strategy or other local strategic plan?

3.4.1 Waverley Local Strategic Planning Statement

Yes. The *Waverley Local Strategic Planning Statement (LSPS)* was adopted and finalised in March 2020. Table 7 documents the actions and strategies that are relevant to this Planning Proposal. The Planning Proposal is of key importance to ensuring that these goals and strategies are achieved.

Table 7 – Relevant Waverley Local Strategic Planning Statement Goals and Strategies	
8.1 Work with the NSW Government to amend Council's LEP and DCP to protect and grow floor space for shops and services in centres while maintaining a diversity of retail offerings	This proposal intends to amend the LEP by adding a minimum non-residential floor space provision in order to retain non-residential floor space in the B4 Mixed Use zoned land in Bondi Junction. This PP is consistent with objective 8.1 of the LSPS as it is promoting the protection of non-residential floor space which can be used for the purposes of shops, services and other various commercial uses.
9.3 Review planning controls to encourage co-working and shared office style	Adding controls to the LEP to protect and promote non-residential floor space in Bondi Junction will help provide floor space to be used for co-working and shared office work spaces. Providing spaces such as these will ensure that residents of Bondi Junction will have greater opportunity to work in close vicinity to where they live.

employment floor space in centres	
11.5 Amend the LEP and DCP to protect and grow employment floor space in Bondi Junction, and to maintain and encourage health related uses in Bondi Junction	The purpose of creating a non-residential floor space provision is to ensure that the existing non-residential floor space in Bondi Junction is maintained and cannot be used for residential development. This will ensure that non-residential floor space is maintained and encouraged so that the capacity for jobs can be protected within the Bondi Junction strategic centre. By promoting non-residential floor space over residential floor space, the capacity for additional health related uses is increased.
11.7 Review the LEP and DCP to encourage a diversity of land uses within Bondi Junction	Promoting non-residential floor space provides for a variety of non-residential uses throughout the Bondi Junction Strategic Centre. Non-residential development is inherently diverse in nature due to the amount of land uses that fall outside of the residential umbrella term. Residential uses are a limited land use and therefore promoting this use over commercial uses would not encourage a diversity of land uses.
11.11 Promote Bondi Junction as a centre for knowledge and innovation jobs	<p>Protecting the B3 zone provides clarity and consistency which subsequently gives certainty to the community, businesses and the development industry, developers need certainty. The withering away of the B3 Commercial Core in Strategic Centres by quasi-residential uses (masquerading as serviced apartments or hotels) sends an ambiguous signal to the market at best. It undermines the integrity of the B3 zone to deliver non-residential outcomes, signalling that immediate development is more important than creating and reinforcing a polycentric city structure that promotes long-term environmental sustainability, social equity and economic success. The economic success of Metropolitan Sydney depends on successful Strategic Centres that can service their economic catchment.</p> <p>Therefore, it is important that Council secure the remaining B3 Commercial Core non-residential floor space for employment generating and knowledge intensive uses to meet a key action in the District Plan. Non-residential development has a slower take-up than residential type uses. Securing the B3 zone and promoting employment generating and knowledge intensive non-residential uses in the B4 zone reflects a long-term view that grasps the cumulative effect of individual development decisions. A long-term view necessitates a 'structural' lens not a 'cyclical' one. Cyclical factors or short-term (quasi) residential development imperatives should not be allowed to cloud 'bigger picture' planning visions. A structural view promotes long-term public economic benefits of non-residential development against damage from short-term private financial gains from residential type uses. By improving the commercial integrity of the B3 zone and promoting non-residential uses in B4 zone, Council secures much needed non-residential floor space to sustain the longer-term growth of the Bondi Junction Strategic Centre.</p>

3.4.2 Waverley Community Strategic Plan 2018-2029

Yes. The *Waverley Community Strategic Plan 2018-2029* was adopted on 19 June 2018. Table 8 documents the actions and strategies that are relevant to this planning proposal. The planning proposal is of key importance to ensuring that these goals and strategies are achieved.

Table 8 – Relevant Waverley Community Strategic Plan Goals and Strategies	
Goals and Strategies	Planning Proposal
4.1 Promote Waverley as a significant sustainable economy and innovation precinct	The planning proposal will ensure that the non-residential floor space, and employment capacity, in Bondi Junction remains viable to promote Waverley as a significant sustainable economy.
4.2 Ensure Bondi Junction and Waverley's villages continue to have a diverse range of businesses, local jobs and services	<p>The planning proposal will ensure that a range of employment opportunities are available in Bondi Junction, providing local jobs for the community.</p> <p>In addition to this, providing a variety of non-residential uses, a diversity of businesses and services are likely to be offered.</p>
4.2.1 Enhance the commercial core of Bondi Junction to increase employment	The planning proposal will contribute to the commercial activity within Bondi Junction. With additional space for non-residential uses, and additional service and business offerings, the centre will continue to be an attractive place to work.

3.4.3 Waverley Local Environmental Plan 2012

Yes. The aims of the WLEP are as follows:

- (1) *This Plan aims to make local environmental planning provisions for land in Waverley in accordance with the relevant standard environmental planning instrument under section 33A of the Act.*
- (2) *The particular aims of this Plan are as follows:*
 - (a) *to promote and co-ordinate a range of commercial, retail, residential, tourism, entertainment, cultural and community uses to service the local and wider community,*
 - (b) ***to maintain and reinforce Bondi Junction as the primary commercial and cultural centre in Sydney's eastern suburbs,***
 - (c) *to provide for a range of residential densities and range of housing types to meet the changing housing needs of the community,*
 - (d) *to provide an appropriate transition in building scale around the edge of the commercial centres to protect the amenity of surrounding residential areas,*
 - (e) *to protect, maintain and accommodate a range of open space uses, recreational opportunities, community facilities and services available to the community,*
 - (f) *to enhance and preserve the natural environment through appropriate planning, protecting the integrity of natural systems and by protecting existing trees,*
 - (g) *to identify and conserve the cultural, environmental, natural, aesthetic, social and built heritage of Waverley.*

The intended outcome of this planning proposal is to provide a provision for a minimum amount of non-residential floor space in all new developments in the Bondi Junction Strategic Centre to protect and increase non-residential floor space. This is to ensure that Bondi Junction can continue to perform a key role in the Eastern Suburbs through a diverse offering of retail, knowledge-economy office space, and health-focused businesses. This intended outcome is consistent with, and will facilitate Aims 2a and 2b of the WLEP.

3.5 Is the planning proposal consistent with applicable State Environmental Planning Policies?

This planning proposal does not contain provisions that contradict or would hinder the application of any SEPPs.

3.6 Is the planning proposal consistent with applicable Ministerial Directions (s.9.1 directions)?

The consistency of the planning proposal with the applicable s9.1 Ministerial Directions is outlined below.

No.	Direction	Comment
1. Employment and Resources		
1.1	<p>Business and Industrial Zones</p> <p>Objectives</p> <p>(1) <i>The objectives of this direction are to:</i></p> <ol style="list-style-type: none"> (a) <i>encourage employment growth in suitable locations,</i> (b) <i>protect employment land in business and industrial zones, and</i> (c) <i>support the viability of identified centres.</i> <p>What a relevant planning authority must do if this direction applies</p> <p>(4) <i>A planning proposal must:</i></p> <ol style="list-style-type: none"> (a) <i>give effect to the objectives of this direction,</i> (b) <i>retain the areas and locations of existing business and industrial zones,</i> (c) <i>not reduce the total potential floor space area for employment uses and related public services in business zones,</i> 	<p>Consistent.</p> <ol style="list-style-type: none"> (a) <i>Give effect to the objectives of the direction:</i> The planning proposal encourages employment growth in an identified centre, it aims to protect and increase employment land in the business zone, and support the viability of Bondi Junction. (b) <i>retain the areas and locations of existing business and industrial zones:</i> The planning proposal aims to retain the existing footprint of Bondi Junction Strategic Centre and to provide increased opportunities for employment within this area. (c) <i>not reduce the total potential floor space area for employment uses and related public services in business zones:</i>

	<p>(d) <i>not reduce the total potential floor space area for industrial uses in industrial zones, and</i></p> <p>(e) <i>ensure that proposed new employment areas are in accordance with a strategy that is approved by the Secretary of the Department of Planning and Environment.</i></p>	<p>The planning proposal aims to ensure that the existing floor space for employment uses and public services is firstly retained, and secondly increased.</p> <p>(d) <i>not reduce the total potential floor space area for industrial uses in industrial zones:</i> There are no industrial zones in Bondi Junction.</p> <p>(e) <i>ensure that proposed new employment areas are in accordance with a strategy that is approved by the Secretary of the Department of Planning and Environment:</i> The planning proposal does not propose new employment areas.</p>
3. Housing, Infrastructure and Urban Development		
3.4	<p>Integrating Land Use and Transport</p> <p>Objectives (1) The objective of this direction is to ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives:</p> <ul style="list-style-type: none"> (a) improving access to housing, jobs and services by walking, cycling and public transport, and (b) increasing the choice of available transport and reducing dependence on cars, and (c) reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and (d) supporting the efficient and viable operation of public transport services, and (e) providing for the efficient movement of freight. <p>What a relevant planning authority must do if this direction applies (4) A planning proposal must locate zones for urban purposes and include provisions that give effect to and are consistent with the aims, objectives and principles of:</p> <ul style="list-style-type: none"> a) Improving Transport Choice – Guidelines for planning and development (DUAP 2001), and b) The Right Place for Business and Services – Planning Policy (DUAP 2001). 	<p>Consistent.</p> <p>The planning proposal does not intend to alter the location of the B4 Mixed Use zone, however it intends to add an additional layer of clarity to ensure that the objectives of the direction are achieved:</p> <ul style="list-style-type: none"> a) Providing increased opportunities for employment in an existing centre that is highly accessible to not only the Waverley LGA but also the Eastern City District, will improve access to jobs by walking, cycling and public transport. b) Bondi Junction is easily accessed via the Bondi Junction Transport Interchange which connects the centre to the District via a large number of bus route and the Eastern Suburbs train line. A significant amount of bicycle parking is provided throughout the centre to encourage cycling, and the centre is easily accessible for pedestrians walking from nearby areas. The range of active and public transport options available to employees, and the reduced amount of available car parking, reduces trips by private vehicles. c) By increasing the number of jobs in Bondi Junction, it is anticipated that local residents will have an increased range of employment opportunities within the area, and be able to reduce their travel time by relocating to Bondi Junction from other employment areas. d) Increasing employment opportunities surrounding the Bondi Junction Transport Interchange will continue to ensure the viability of the multitude of transport services in the area.
6. Local Plan Making		
6.3	<p>Site Specific Provisions</p> <p>Objective The objective of this direction is to discourage unnecessarily restrictive site specific planning controls, and applies when a relevant planning authority prepares a planning proposal that will allow a particular development to be carried out.</p> <p>What a relevant planning authority must do if this direction applies</p>	<p>Consistent.</p> <p>This planning proposal outlines precinct level, rather than any site specific planning controls.</p>

	<p>(4) A planning proposal that will amend another environmental planning instrument in order to allow a particular development proposal to be carried out must either:</p> <ul style="list-style-type: none"> (a) allow that land use to be carried out in the zone the land is situated on, or (b) rezone the site to an existing zone already applying in the environmental planning instrument that allows that land use without imposing any development standards or requirements in addition to those already contained in that zone, or (c) allow that land use on the relevant land without imposing any development standards or requirements in addition to those already contained in the principal environmental planning instrument being amended. <p>(5) A planning proposal must not contain or refer to drawings that show details of the development proposal.</p>	
7. Metropolitan Planning		
7.1	<p>Implementation of A Plan for Growing Sydney</p> <p>Objectives</p> <ul style="list-style-type: none"> (1) The objective of this direction is to give legal effect to the planning principles; directions; and priorities for subregions, strategic centres and transport gateways contained in A Plan for Growing Sydney. <p>What a relevant planning authority must do if this direction applies</p> <ul style="list-style-type: none"> (4) Planning proposals shall be consistent with: <ul style="list-style-type: none"> (a) the NSW Government's A Plan for Growing Sydney published in December 2014. Planning proposals must be consistent with a Regional Plan released by the Minister for Planning. 	<p>Consistent.</p> <p>The planning proposal is consistent with Direction 7.1 as it satisfies section (4) 'What a relevant planning authority must do if this direction applies.' A Plan for Growing Sydney has been superseded by the Greater Sydney Region Plan. The planning proposal gives effect to the <i>Greater Sydney Region Plan</i> and the <i>Eastern City District Plan</i> as outlined in Section 3.3.</p>
Miscellaneous Directions		
	<p>Local Planning Panels</p> <p>Objective</p> <p>The objective of this direction is to identify the types of planning proposals that are to be advised on by local planning panels on behalf of councils in the Greater Sydney Region and Wollongong.</p> <p>Direction</p> <p>A council to whom this direction applies is required to refer all planning proposals to be prepared after 1 June 2018 to the local planning panel for advice, unless the council's general manager determines that the planning proposal relates to:</p> <ul style="list-style-type: none"> (a) The correction of an obvious error in a local environmental plan, (b) Matters that are of a consequential, transitional, machinery or other minor nature, or (c) Matters that council's general manager considers will not have any significant adverse impact on the environment or adjoining land. <p>A proposal is to be referred to the local planning panel before it is forwarded to the Minister under section 3.34 of the <i>Environmental Planning and Assessment Act 1979</i>.</p>	<p>Consistent.</p> <p>The planning proposal is consistent with the Local Planning Panels Direction as it has been referred to the relevant local planning panel – the Waverley Local Planning Panel (WLPP). The advice provided by the WLPP is provided at Attachment 3 to this planning proposal.</p>

Section C – Environmental, social and economic impact

3.7 Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

No. The planning proposal aims to increase the employment capacity of the existing Strategic Centre. This is proposed to be carried out within the existing footprint of the Centre, and accordingly will not impact upon any critical habitat, threatened species, or ecological communities or their habitats.

3.8 Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

No. There are no changes to density or land uses that would increase environmental effects.

3.9 Has the planning proposal adequately addressed any social and economic effects?

Loss of Non-residential floor space

This Planning Proposal aims to address current social and economic effects in the area. Bondi Junction currently provides critical services to the Eastern Suburbs such as health, education, office space, and retail. The status quo has seen many non-residential buildings redeveloped and replaced with a nominal amount of ground floor retail, and in some cases ground and first floor non-residential, and residential development above. This pattern has resulted in the net loss of non-residential floor space, resulting in reduced floor space that is able to cater for these critical services in Bondi Junction. As the quantum of floor space is reduced, the remaining floor space is in high demand and results in increased prices.

To ensure that Bondi Junction can perform its role as a strategic centre, more floor space for employment opportunities is required to offer a range of services. By ensuring that adequate floor space is provided as non-residential, this will increase the employment opportunities in the Eastern Suburbs, with the intended outcome of increasing the number of residents that are able to work in the area.

Knowledge-Industry

Action 46c of the District plan is to expand the centre's function and type of land uses, and employment generating and knowledge intensive jobs. This mechanism encourages office space to be provided within the Centre to encourage knowledge-industry workers to the area.

An increasing trend in the global knowledge economy market is to provide shared or co-working spaces that provide flexibility in the way that people work, allowing residents to telecommute a number of days a week to another location, for entrepreneurs to pay a reduced rate for office space and to benefit from the networking opportunities and office services, and for start-ups to grow in a cost effective manner, thereby reducing the risks of business. It is likely that a minimum non-residential floor space provision will provide more opportunities for these spaces to open due to the relatively low fit out costs and low operation costs. This would also encourage more knowledge-industry jobs to move to the area to inject more life and vibrancy onto the streets of Bondi Junction.

Bondi Junction economic profile and commercial viability

Bondi Junction is a large suburban non-residential market, similarly sized to Chatswood, however it is not considered a metro market that attracts major companies and headquarters like Chatswood, North Sydney or Parramatta. Bondi Junction's economic catchment is sub-regional, servicing the Eastern Suburbs and surrounds with tenants including local professionals, health providers and institutional bodies. At the same time, Bondi Junction has solid market fundamentals with a vacancy rate lower than

the Sydney average and other suburban and metro markets, and comparable – and in some instances higher rents for similar grade non-residential floor space. As a Strategic Centre with an established non-residential presence, Bondi Junction has non-residential returns that are higher than smaller centres and sufficient to warrant further investment in non-residential floor space and hence underpin the viability of future development. The balance of evidence suggests that there is strong underlying demand for non-residential floor space Bondi Junction.

Feasibility testing for specific sites in Bondi Junction (see attached Bondi Junction Commercial Centre Review) indicates that non-residential development is currently feasible. With vacancy levels the lowest they have been in a decade, new non-residential development would be absorbed by the market. Given that the feasibility modelling focuses on pure non-residential development, a mixed use outcome is even more feasible (with higher revenue underpinned by residential floor space). There are already examples of successful mixed use outcomes across Bondi Junction including 17-25 Spring Street (3 levels non-residential, 8 levels residential) and 249-251 Oxford Street (8 levels non-residential, 6 levels residential).

3.10 Is there adequate public infrastructure for the planning proposal?

The draft changes to the planning controls will not permit a significant increase in development potential or capacity, however it will alter the capacity type to ensure that the majority offering within Bondi Junction is non-residential floor space, with residential to provide mixed uses and a vibrant public life.

Utilities, waste management and recycling services

The full range of utility services (electricity telecommunications, water and sewer) and waste management and recycling services are all currently available across Bondi Junction.

Public transport and roads

Bondi Junction is well serviced by existing public transport including the T2 Eastern Suburbs Line Train and many buses that connect the centre to the Eastern District. *Waverley's People, Movement and Places* (PMP) strategy adopted by Council in 2017 outlines a number of key projects that Council intends to implement and provide funding for over the next 5 – 20 years. As the large majority of development that will occur in Bondi Junction as a result of this PP will be non-residential in nature it is envisaged that parking will not need to be increased within Bondi Junction. Furthermore, Waverley's zero parking requirements will also advocate for minimal upgrades being required. Whilst no upgrades are planned for the road network, it is envisioned that employees will predominantly use active or public transport to access the centre, in accordance with the PMP strategy.

3.11 What are the views of state and Commonwealth public authorities consulted in accordance with the Gateway determination?

The gateway determination will specify the level of public consultation that must be undertaken in relation to the planning proposal.

PART 4 – MAPPING

The Planning Proposal seeks to use the existing Key Sites map, however this PP will not affect the operation of Clause 6.9 of the LEP. Like Clause 6.9, the Additional Local Provision resulting from this PP will reference the Key Sites Map. On the LEP Maps the Clauses will be differentiated using a hatching over the affected area or a coloured bolded line over the edge lining of the affected area.

- Key Sites Map – refer to Additional Local Provision clause for minimum non-residential requirements.

Figure 13: Key sites map to be amended in PP



PART 5 – COMMUNITY CONSULTATION

Public exhibition is to occur on the Council's website. The gateway determination will specify the level of public consultation that must be undertaken in relation to the planning proposal.

Pursuant to Division 3.4 of the Act, a planning proposal must be placed on public exhibition for a minimum of 28 days, or as specified in the gateway determination for the proposal. The Responsible Planning Authority must consider any submissions made concerning the proposed instrument and the report of any public hearing.

PART 6 – PROJECT TIMELINE

The following indicative project timeline will assist with tracking the progress of the planning proposal through its various stages of consultation and approval. It is estimated that this amendment to WLEP will be completed by December 2020.

The detail around the project timeline is expected to be prepared following the referral to DPE for a Gateway Determination.

Tasks	Timeframe
Gateway Determination	March 2020
Community Consultation	July – August 2020
Post Exhibition Review	August – September 2020
Update Planning Proposal / Report to Council	August – September 2020
Parliamentary Counsel drafting of LEP	September - December 2020
DPIE to finalise LEP	December 2020

APPENDICES

[Appendix 1 – Bondi Junction Commercial Centre Review](#)

[Appendix 2 – Waverley Local Planning Panel Feedback](#)

WLPP-1907.PP

Planning Proposals

The Panel will provide confidential advice on any planning proposals presented at the meeting.

DECISION: The Panel agrees with the Planning Proposal.

REASONS:

1. The Panel agrees that the proposal is a first step to stem the loss of commercial floor space and protect the limited remaining commercial floor space capacity.
2. The proposal is a step in meeting the necessary retention and growth of employment floor space.
3. The issue of the loss of commercial floor space is one that has been noticeable for some time now and needs to be addressed urgently and see this planning proposal as an essential first step in that direction. The proposal is particularly apposite given the public transport infrastructure and the need to continue to generate increase numbers in the area.

For the Decision: Stein, Mora, Murrell and Thorp

Against the Decision: Nil.

P Connor (Strategic Planner on behalf of Waverley Council) addressed the meeting.

Appendix 3 - Alignment with District Plan

Table 9 – Relevant Actions	
Relevant Item	Discussion
Direction: Designing places for people	
Planning Priority E6: Creating and renewing great places and local centres, and respecting the District's heritage	
Objective 12 – Great places that bring people together	
Objective 13 – Environmental heritage is identified, conserved and enhanced	
1. Using a place-based and collaborative approach throughout planning, design, development and management, deliver great places by: <ul style="list-style-type: none"> a. prioritising a people-friendly public realm and open spaces as a central organising design principle b. recognising and balancing the dual function of streets as places for people and movement c. providing fine grain urban form, diverse land use mix, high amenity and walkability, in and within a 10-minute walk of centres d. integrating social infrastructure to support social connections and provide a community hub e. recognising and celebrating the character of a place and its people. 	Yes, the Planning Proposal aims to increase the land use mix within Bondi Junction Strategic Centre to continue to be able to support a range of services.
Direction: Developing a more accessible and walkable city	
Planning Priority E10: Delivering integrated land use and transport planning and a 30 minute city	
Objective 14 - A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities	
33. Integrate land use and transport plans to deliver the 30-minute city.	Yes, this Planning Proposal aims to help deliver the 30-minute city by ensuring that Bondi Junction provides crucial jobs and services to the Eastern District.
Direction: Creating the conditions for a stronger economy	
Planning Priority E11: Growing investment, business opportunities and jobs in strategic centres	
Objective 22 - Investment and business activity in centres	
34. Provide access to jobs, goods and services in centres by: <ul style="list-style-type: none"> a. attracting significant investment and business activity in strategic centres to provide jobs growth b. diversifying the range of activities in all centres c. creating vibrant, safe places and quality public realm d. focusing on a human-scale public realm and locally accessible open space e. balancing the efficient movement of people and goods with supporting the liveability of places on the road network f. improving the walkability within and to centres g. completing and improving a safe and connected cycling network to and within centres h. improving public transport services to all strategic centres i. conserving and interpreting heritage significance j. designing parking that can be adapted to future uses k. providing for a diverse and vibrant night-time economy in a way that responds to potential negative impacts 	<p>Yes, the Planning Proposal aims to:</p> <ul style="list-style-type: none"> • attract investment and business activity to Bondi Junction Strategic Centre by providing employment related floor space • ensure that residential development does not dominate the developments within Bondi Junction • improve the night life and public domain experience of pedestrians by having more workers around during the day, and for events immediately after work.

l. creating the conditions for residential development within strategic centres and within walking distance (10 minutes), but not at the expense of the attraction and growth of jobs, retailing and services; where appropriate, strategic centres should define commercial cores informed by an assessment of their need.	
35. Review the current planning controls and create capacity to achieve the job targets for each of the District's strategic centres.	This Planning Proposal directly responds to this Action.
36. Prioritise strategic land use and infrastructure plans for growing centres, particularly those with capacity for additional retail floor space.	This Planning Proposal directly responds to this Action.
37. Encourage opportunities for new smart work hubs.	This Planning Proposal aims to provide increased opportunities for new smart work hubs.
38. Strengthen Bondi Junction through approaches that: <ul style="list-style-type: none"> a. protect capacity for job targets and a diverse mix of uses to strengthen and reinforce the economic role of the centre b. consider potential options for future public transport connections to the south east of the District to accommodate forecast population and employment growth, and better connect the District c. expand the centre's function and type of land uses, and knowledge-intensive jobs d. improve access from the centre of Bondi Junction to nearby open space and recreation facilities such as Queens Park, Centennial Park, Moore Park and Bondi Beach e. recognise the centre's health attributes to support the Randwick health and education precinct and mechanisms for increasing floor space for health uses, including a health-focused business incubator f. investigate opportunities to improve and diversify night-time economy offerings g. promote place making initiatives to improve the quality of public spaces. 	<p>This Planning Proposal aims to:</p> <ul style="list-style-type: none"> • protect capacity for job targets and provide a diverse mix of uses (by limiting residential encroachment) and to reinforce the economic role of the centre • expand the centre's function and types of land uses, and knowledge-intensive jobs by ensuring that there is adequate non-residential floor space provided within the centre.

Appendix 4 - Alignment with Local Strategic Planning Statement

Planning Priority 8 Connect people to inspiring and vibrant places, and provide easy access to shops, services and public transport		
Action		
1.	Work with NSW Government to amend Council's LEP and DCP to protect and grow floor space for shops and services in centres while maintaining a diversity of retail offerings	This Planning Proposal aims to ensure that every development in Bondi Junction has a minimum amount of non-residential floor space. This will ensure floor space for uses such as shops and services is protected and can be used for a variety of non-residential uses.
Planning Priority 9 Connect people to inspiring and vibrant places, and provide easy access to shops, services and public transport		
3.	Review planning controls to encourage co-working and shared office style employment floor space in centres	Adding controls to the LEP to protect and promote non-residential floor space in Bondi Junction will help provide floor space to be used for co-working and shared office work spaces. Providing spaces such as these will ensure that residents of Bondi Junction will have greater opportunity to work in close vicinity to where they live.
Planning Priority 11 Bondi Junction is a lively and engaging strategic centre with a mix of employment, entertainment and housing options		
Action		
5.	Amend the LEP and DCP to protect and grow employment floor space in Bondi Junction, and to maintain and encourage health related uses in Bondi Junction	The purpose of creating a non-residential floor space provision is to ensure that the existing non-residential floor space in Bondi Junction is maintained and cannot be used for residential development. This will ensure that non-residential floor space is maintained and encouraged so that the capacity for jobs can be protected within the Bondi Junction strategic centre. By promoting non-residential floor space over residential floor space, the capacity for additional health related uses is increased.
7.	Review the LEP and DCP to encourage a diversity of land uses within Bondi Junction	Promoting non-residential floor space provides for a variety of non-residential uses throughout the Bondi Junction Strategic Centre. Non-residential development is inherently diverse in nature due to the amount of land uses that fall outside of the residential umbrella term. Residential uses are a limited land use and therefore promoting this use over commercial uses would not encourage a diversity of land uses.
11.	Promote Bondi Junction as a centre for knowledge and innovation jobs	Protecting the B3 zone provides clarity and consistency which subsequently gives certainty to the community, businesses and the development industry, developers need certainty. The withering away of the B3 Commercial Core in Strategic Centres by quasi-residential uses (masquerading as serviced apartments or hotels) sends an ambiguous signal to the market at best. It undermines the integrity of the B3 zone to deliver non-residential outcomes, signalling that immediate development is more important than creating and reinforcing a polycentric city structure that promotes long-term environmental sustainability, social equity and economic success. The economic success of

Metropolitan Sydney depends on successful Strategic Centres that can service their economic catchment.

Therefore, it is important that Council secure the remaining B3 Commercial Core non-residential floor space for employment generating and knowledge intensive uses to meet a key action in the District Plan. Non-residential development has a slower take-up than residential type uses. Securing the B3 zone and promoting employment generating and knowledge intensive non-residential uses in the B4 zone reflects a long-term view that grasps the cumulative effect of individual development decisions. A long-term view necessitates a 'structural' lens not a 'cyclical' one. Cyclical factors or short-term (quasi) residential development imperatives should not be allowed to cloud 'bigger picture' planning visions. A structural view promotes long-term public economic benefits of non-residential development against damage from short-term private financial gains from residential type uses. By improving the commercial integrity of the B3 zone and promoting non-residential uses in B4 zone, Council secures much needed non-residential floor space to sustain the longer-term growth of the Bondi Junction Strategic Centre.
