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Letter of Support: Fairfield City Council draft Local Strategic Planning Statement

Thank you for submitting Fairfield City Council's draft Local Strategic Planning Statement (LSPS) seeking the support of the Greater Sydney Commission (the Commission) for consistency with the Greater Sydney Region Plan – *A Metropolis of Three Cities* (GSRP) and Western City District Plan. The making of LSPSs by councils in Greater Sydney marks a milestone in the delivery of planning reforms that place greater emphasis on strategic planning.

In our role as the Commission's Assurance Panel, we appreciate that these first LSPSs across Greater Sydney are foundational in strengthening how growth and change will be managed into the future. We note your draft LSPS has been prepared in response to the provisions of Section 3.9 of the *Environmental Planning & Assessment Act 1979* (EP&A Act).

We confirm that the Commission supports Fairfield City Council's draft Local Strategic Planning Statement (March 2020) as being consistent with the Greater Sydney Region Plan and Western City District Plan under Section 3.9(3A) of the EP&A Act.

Our decision on consistency reflects the work already undertaken informing your first LSPS. It also reflects that work is still in progress (including the Local Housing Strategy, planning for the Horsley Park Urban Investigation Area and updates to the Economic Development Strategy) which will further support the LSPS and inform future updates.

The Commission's support is based, in part, on Council's intent to deliver the Western City District Plan as set out in the Local Strategic Planning Statement.

In this context, the Commission's expectation is that Council will undertake a program of work to implement the LSPS and has, at **Attachment A**, included Advisory Notes to assist Council. These Advisory Notes have regard to:

- the interrelationship of the LSPS, housing targets and the Local Housing Strategy for Fairfield City Council;



- updates to population projections during the preparation of the LSPS;
- Future Transport 2056's city-shaping and city-serving transport infrastructure;
- interdependencies with State agency programs and policies;
- key initiatives that relate to resilience planning; and
- Council-led initiatives identified for further investigation.

It is further noted that Council may need to update the LSPS as key supporting studies, including the Local Housing Strategy, are finalised.

In conclusion, we acknowledge the significant amount of work that Council has undertaken to develop the LSPS, and the spirit of collaboration that Council has shown throughout this process. Please pass on our thanks to all the members of your team who have assisted in achieving this significant milestone for Fairfield City Council. We look forward to continuing our work together creating a more liveable, productive and sustainable Greater Sydney.

With the benefit of this Letter of Support, it is now up to Council to determine whether it will make the draft LSPS (March 2020). Please note that no further amendments may be made to the LSPS prior to it being made (unless a further Letter of Support is obtained from the Commission).

Please be advised that once the LSPS is published on the NSW ePlanning Portal, the LSPS Tracker on the Commission's website will be updated to include this Letter of Support. Should you have any questions on the making of your LSPS, please contact Catherine Van Laeren, A/Executive Director, Central River City and Western Parkland City, Department of Planning, Industry and Environment on (02) 9860 1520 or Catherine.VanLaeren@planning.nsw.gov.au

Yours sincerely,

Lucy Turnbull
Chief Commissioner
Chair of Assurance Panel
Commission Delegate

Elizabeth Dibbs
Western City District Commissioner
Assurance Panel Member

23 March 2020

cc. Jim Betts, Secretary, Department of Planning, Industry and Environment
Elizabeth Mildwater, Deputy Secretary, Transport for NSW
Anthony Manning, Chief Executive, School Infrastructure NSW
Nigel Lyons, Deputy Secretary, NSW Ministry of Health



Attachment A

Advisory Notes on implementation of Fairfield City Council draft Local Strategic Planning Statement:

These Advisory Notes highlight key considerations to support Council in the implementation of the first LSPS.

Western City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
<p>Infrastructure and Collaboration</p>	
<p>1. State-led transport investigations and projects</p> <p><i>Planning Priority W1, Action 3 seeks to align forecast growth with infrastructure.</i></p>	<ul style="list-style-type: none"> • Continue to consult with Transport for NSW (TfNSW) on planning for city-shaping & city-serving transport initiatives in Future Transport 2056¹ including: <ul style="list-style-type: none"> ○ 0-10 year initiatives for investigation in progress²: Western Sydney Airport – Badgerys Creek Aerotropolis – Parramatta rail link, T-Way to T-Way link and infrastructure to support rapid bus connections and improved bus connections between WSA-Badgerys Creek Aerotropolis and Penrith, Liverpool, Blacktown and Campbelltown-Macarthur. ○ 10-20 year initiatives for investigation: Western Sydney Freight Line.
<p>2. Council-led transport initiatives</p> <p><i>Planning Priority W1 seeks to plan for a city supported by infrastructure</i></p>	<ul style="list-style-type: none"> • Note: The LSPS has included Council-led transport initiatives and will require ongoing consultation and collaboration with State agencies including Council's proposed Transport Strategy.
<p>3. Horsley Park Urban – Mount Vernon Investigation Area</p> <p><i>Planning Priority W1, Action 2 seeks to sequence growth across the three cities to promote north-south and east-west connections.</i></p>	<ul style="list-style-type: none"> • Note: Horsley Park – Mount Vernon Urban Investigation Area is identified in the District Plan and is being led by Council. • Continue to collaborate with Department of Planning, Industry and Environment (DPIE), Penrith City Council, infrastructure agencies and service providers

¹ Source: <https://future.transport.nsw.gov.au/plans/greater-sydney-services-and-infrastructure-plan/service-and-infrastructure-initiatives>

² Source: <https://future.transport.nsw.gov.au/delivering-future-transport-2056>



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<p><i>Planning Priority W1, Action 3 seeks to align forecast growth with infrastructure.</i></p> <p><i>Planning Priority W1, Action 4 seeks to sequence infrastructure provision using a place-based approach.</i></p> <p><i>Planning Priority W8 seeks to establish the land use and transport structure to deliver a liveable, productive and sustainable Western Parkland City.</i></p> <p><i>Planning Priority W13, Action 71 requires councils to implement the South Creek Corridor Project and use the design principles for South Creek to deliver a cool and green Western Parkland City.</i></p> <p><i>Planning Priority W17, Action 79 requires Council to limit urban development to within the Urban Area, except for the investigation areas at Horsley Park, Orchard Hills and east of The Northern Road, Luddenham.</i></p>	<p>on the investigation of urban development and place based infrastructure planning that aligns infrastructure with growth for the Horsley Park – Mount Vernon Urban Investigation Area.</p> <ul style="list-style-type: none"> • Implement the South Creek urban design principles and deliver new communities that support: <ul style="list-style-type: none"> ○ greater walkability; ○ increased urban tree canopy; ○ increased deep soil landscaping; and ○ retention of water in the landscape.
<p>4. Shared use agreements</p> <p><i>Planning Priority W3, Action 10 seeks to optimise the use of available public land for social infrastructure.</i></p>	<ul style="list-style-type: none"> • Continue to work with Department of Education on potential shared use agreements for school grounds and facilities to provide additional open space and community spaces.
<p>Liveability</p>	
<p>5. Local Housing Strategy - Housing analysis</p> <p><i>Planning Priority W5, Action 17 requires councils to prepare Local Housing Strategies.</i></p> <p><i>Planning Priority W5, Action 18 requires councils to prepare Affordable Rental Housing Target Schemes following the development of implementation arrangements.</i></p>	<ul style="list-style-type: none"> • Note: The NSW Government’s Local Housing Strategy Guidelines³ require Council’s Local Housing Strategy to be approved by DPIE. • As set out in the Local Housing Strategy Guideline⁴, the strategy is to include an analysis of changing demographics, housing density and housing market demand to confirm take-up rates and proposed staged approach.

³ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/Local-Housing-Strategy-Guideline-and-Template.pdf>

⁴ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/Local-Housing-Strategy-Guideline-and-Template.pdf>



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	<ul style="list-style-type: none"> • Note: The Local Housing Strategy should be informed by the NSW Government’s Guideline for Developing an Affordable Housing Contribution Scheme⁵. • Undertake analysis on the viability of affordable rental housing target schemes as part of the development of Council’s Local Housing Strategy and Affordable Housing Strategy. • As part of the Local Housing Strategy, undertake analysis on the impacts of secondary dwellings on: <ul style="list-style-type: none"> ○ the implications for overall housing supply; ○ demand for infrastructure and services, including transport, social infrastructure and open space; and ○ the demographic profile of residents of secondary dwellings in Fairfield.
<p>6. Local Housing Strategy – 6-10 year housing target</p> <p><i>Planning Priority W5, Action 17(b) requires Local Housing Strategies to address the delivery of 6-10 year (when agreed) housing supply targets for each local government area.</i></p>	<ul style="list-style-type: none"> • As set out in Action 4 of the Greater Sydney Region Plan, Council’s 6-10 year housing target is to inform the development of updated local environmental plans (LEPs) and housing strategies. • The Commission notes: <ul style="list-style-type: none"> ○ Council’s LSPS indicates that dwellings are projected to increase by 16,064 by 2036, based on population projections.⁶ ○ DPIE monitoring⁷ shows the current pipeline for the period 2019/20 to 2023/24 is 2,700 dwellings. • In this context, Council is to show how it can meet an indicative draft range for 6-10 year housing targets for the period 2021/22 to 2025/26 of 3,000 to 3,800 dwellings as part of its Local Housing Strategy.

⁵ Source: <https://www.planning.nsw.gov.au/Policy-and-Legislation/Housing/Diverse-and-affordable-housing/-/media/C6F1D0F0359C4AB7A28C90BE7DEEE636.ashx>

⁶ Source: Fairfield Local Strategic Planning Statement March 2020, p.39

⁷ Source: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Forecast-data>



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	<ul style="list-style-type: none"> • Testing this indicative range is to include a preliminary assessment of any relevant NSW Government investment decisions in consultation with State agencies. • Where relevant data is available, councils are to identify the contribution of non-standard dwellings⁸ (seniors housing, boarding houses and secondary dwellings) in relation to this indicative range. • Note: The NSW Government’s strategic documents outline the direction for planning land use, service and infrastructure delivery across NSW. Population projections⁹ are subject to review over time and will be managed through updates to the Region and district plans.
<p>7. Local character</p> <p><i>Planning Priority W6, Action 19 requires recognising and celebrating the character of a place and its people throughout planning, design, development and management to deliver great places.</i></p>	<ul style="list-style-type: none"> • Note: In identifying local character and/or desired future character, Council should have reference to the NSW Government Local Character and Place Guideline (2019) and Government Architect NSW’s, Better Placed: An integrated design policy for the built environment of NSW (2017). • Consult with DPIE on the approach to implementing local character.
<p>8. Heritage</p> <p><i>Planning Priority W6, Action 21 requires councils to identify, conserve and enhance environmental heritage.</i></p>	<ul style="list-style-type: none"> • Continue to work with DPIE and Heritage NSW to ensure a strategic approach is taken to environmental heritage including Aboriginal cultural heritage in implementing the LSPS and developing LSPS updates.
<p>9. Local contributions</p> <p><i>Planning Priority W3, Action 9 requires councils to deliver social infrastructure</i></p>	<ul style="list-style-type: none"> • Consult with DPIE regarding local contribution rates and the essential works list.

⁸ Source: Standard dwellings relate to those monitored via DPIE’s housing monitor (i.e. Sydney Water connections) and Non-standard dwellings are those delivered under housing related SEPPs such as seniors, boarding houses and affordable rental housing (secondary dwellings). For more information refer to: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Other-forms-of-housing>

⁹ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Fairfield.pdf>



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<i>that reflects the needs of the community now and in the future.</i>	
<p>10. Place-based planning for local centres</p> <p><i>Planning Priority W6, Action 22 requires place-based planning to support the role of centres as a focus for connected neighbourhoods.</i></p>	<ul style="list-style-type: none"> • Work with DPIE on more detailed strategic planning for local centres which should provide indicative locations for future housing.
Productivity	
<p>11. Industrial and employment lands strategy</p> <p><i>Planning Priority W10, Action 52 requires Fairfield Council to review and manage industrial and urban services land, in line with the principles for managing industrial and urban services land by safeguarding all industrial zoned land.</i></p>	<ul style="list-style-type: none"> • Note: The Western City District Plan identifies industrial and urban services land in Fairfield as ‘Review and Manage’ . • Confirm with DPIE if Council’s updated Economic Development Strategy planned Employment Lands Study and any following strategies require approval to inform LEP updates.
<p>12. Strategic centres</p> <p><i>Planning Priority W11, Action 57 requires councils to provide access to jobs, goods and services in centres and Action 58 requires councils to prioritise strategic land use and infrastructure plans for growing centres.</i></p>	<ul style="list-style-type: none"> • Confirm with DPIE if the proposed Centres Strategy and place-based planning for strategic centres, requires approval to inform LEP updates.
Sustainability	
<p>13. Open space strategy</p> <p><i>Planning Priority W18, Action 80 requires councils to maximise the use of existing open space and protect, enhance and expand open space.</i></p>	<ul style="list-style-type: none"> • Consider Council’s contribution to the Premier’s Priority to ‘Increase the proportion of homes in urban areas within 10 minutes’ walk of quality green, open and public space by 10 per cent by 2023’. • Confirm with DPIE if Council’s planned Open Space Strategy requires approval to inform LEP updates.
<p>14. Resilience to natural and urban hazards</p> <p><i>Planning Priority W20 requires councils to respond to the impacts of climate change (Action 87) and limit the</i></p>	<ul style="list-style-type: none"> • Collaborate with the Greater Sydney Commission, other relevant state agencies and neighbouring councils to strengthen approaches to resilience in



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<p><i>intensification of development in areas most exposed to hazards (Action 88) and mitigate the urban heat island effect (Action 89).</i></p>	<p>Council's strategies, plans and programs, particularly the:</p> <ul style="list-style-type: none"> ○ Community Facilities Strategy; ○ Open Space and Recreation Strategy; ○ Biodiversity Strategy; ○ Transport Strategy; and ○ Public Domain Plans.
<p>16. Flooding and bushfire</p> <p><i>Planning Priority W20 requires councils to adapt to the impacts of urban and natural hazards and climate change.</i></p>	<ul style="list-style-type: none"> ● Consult with DPIE and State agencies to prepare flood and fire risk management plans.
Implementation	
<p>18. Planning framework</p> <p><i>Section 6 Implementation, Figure 30.</i></p>	<ul style="list-style-type: none"> ● Notwithstanding the content of the LSPS, Ministerial Directions under Section 9.1 of the EP&A Act and State Environmental Planning Policies continue to apply to the LGA.
<p>19. Updates to LSPS</p> <p><i>Planning Priority W21, Action 91 requires councils to prepare local strategic planning statements informed by local strategic planning.</i></p>	<ul style="list-style-type: none"> ● Note: The LSPS notes that “<i>changing circumstances and the benefits of aligning the LSPS with Council’s overarching community strategic planning and IP&R [Integrated Planning and Reporting] framework are likely to require earlier updates of the LSPS</i>”¹⁰. ● As set out in the LSPS Guidelines, revisions to the LSPS may be required in response to significant changes in the LGA such as announcements on centres revitalisation, new infrastructure investment and employment opportunities, significant changes in projected population growth or changes to the relevant higher order strategic plan. ● Update the LSPS when key supporting studies including the Local Housing Strategy are completed, noting that the Local Housing Strategy is to be approved by DPIE.

¹⁰ Source: Fairfield Local Strategic Planning Statement March 2020, p.84



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<p>20. Monitoring and review – Implementation</p> <p><i>Planning Priority W21, Action 91 LEP Review and Section 3.8 (4a) EP&A Act LEP Updates</i></p>	<ul style="list-style-type: none"> Progress on the implementation of the District Plan will be reviewed and monitored with a focus on actions that support LEP Updates.
<p>21. Monitoring and review – Performance indicators</p> <p><i>Planning Priority W22, Action 92 requires the development of performance indicators in consultation with state agencies and councils that measure the 10 Directions to inform inter-agency, State and local government decision-making.</i></p>	<ul style="list-style-type: none"> Council is encouraged to apply the performance indicators in <i>The Pulse of Greater Sydney</i>, which are available at LGA levels¹¹.

¹¹ Source: <https://www.greater.sydney/pulse-of-greater-sydney>