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Letter of Support: Inner West Council draft Local Strategic Planning Statement

Thank you for submitting Inner West Council's draft Local Strategic Planning Statement (LSPS) seeking support from the Greater Sydney Commission (the Commission) for consistency with the Greater Sydney Region Plan – *A Metropolis of Three Cities* (GSRP) and Eastern 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 in 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 Inner West Council's draft Local Strategic Planning Statement (20 March 2020) as being consistent with the Greater Sydney Region Plan and Eastern 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, the Employment and Retail Lands Strategy and the Community Assets Needs Strategy) which will further support the LSPS and inform future updates to the LSPS.

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

In this context, the Commission's expectation is that Council will undertake this 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 a Local Housing Strategy for Inner West 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 strategies, 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 Inner West 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 (20 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 making your LSPS, please contact Amanda Harvey, A/Executive Director, Eastern Harbour City, Department of Planning, Industry and Environment on (02) 8275 1120 or Amanda.Harvey@planning.nsw.gov.au.

Yours sincerely,

Lucy Turnbull AO
Chief Commissioner
Chair of Assurance Panel
Commission delegate

Dr Deborah Dearing
Eastern City District Commissioner
Assurance Panel Member

25 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 Inner West Council draft Local Strategic Planning Statement:

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

Eastern 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 E1, 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 and city-serving transport initiatives in Future Transport 2056¹ including: <ul style="list-style-type: none"> ○ 0-10 years committed initiatives in progress²: Sydney Metro City & Southwest, WestConnex, Parramatta Road public transport improvements, Ferry Fleet Replacement Program, including upgraded services to Parramatta River ferries, More Trains, More Services program – T4, Western Harbour Tunnel and Beaches Link, Sydney Metro West. ○ 0-10 years initiatives for investigation: Eastern Suburbs to Inner West rapid bus links, Additional cruise ship capacity, More Trains, More Services program – T2.
<p>2. Council-led transport initiatives</p> <p><i>Planning Priority E1 seeks to plan for a city supported by infrastructure.</i></p>	<ul style="list-style-type: none"> • Note: The draft LSPS includes Council-led transport infrastructure initiatives as described on pages 48-51 that will require further investigation to determine alignment with TfNSW's strategic planning priorities.
<p>3. Collaboration Areas</p>	<ul style="list-style-type: none"> • Work with the Commission to implement the Camperdown-Ultimo Collaboration Area in

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 E2, Action 7 seeks to identify, prioritise and deliver Collaboration Areas.</i></p>	<p>accordance with the adopted vision and strategic priorities (LSPS Actions 13.2 to 13.5, page 69).</p>
<p>Liveability</p>	
<p>4. Local Housing Strategy - Housing analysis</p> <p><i>Planning Priority E5, Action 16 requires councils to prepare a Local Housing Strategy.</i></p> <p><i>Planning Priority E5, Action 17 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 Guidelines require Council’s Local Housing Strategy to be approved by the Department of Planning, Industry and Environment (DPIE). • As set out in the Local Housing Strategy Guideline³, 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. • Note: The Local Housing Strategy should be informed by the NSW Government’s Guideline for Developing an Affordable Housing Contribution Scheme⁴.
<p>5. Local Housing Strategy - 6-10 year housing target</p> <p><i>Planning Priority E5, Action 16(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 draft Local Housing Strategy indicates a 6-10 year target for the period 2021 to 2026 of 5,000 dwellings⁵. ○ DPIE monitoring⁶ shows the current housing supply forecast for the period 2019/20 to 2023/24 of 4,900 dwellings.

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/Policy-and-Legislation/Housing/Diverse-and-affordable-housing/-/media/C6F1D0F0359C4AB7A28C90BE7DEEE636.ashx>

⁵ Source: Inner West Draft Local Housing Strategy, p49

⁶ 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"> In this context, Council is to show how it can meet an indicative draft range 6-10 year housing target for the period 2021/22 to 2025/26 of 5,000 to 5,700 dwellings as part of the Local Housing Strategy and relevant LEP updates. Testing of 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 non-standard dwellings⁷ (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 projections⁸ are subject to review over time and will be managed through updates to the Region and district plans.
<p>6. Local infrastructure</p> <p><i>Planning Priority E3, Actions 8 & 9 seek to promote delivery of new social infrastructure and optimised use of public land for social infrastructure.</i></p>	<ul style="list-style-type: none"> Work with relevant community infrastructure, health and education providers to develop partnerships to encourage joint/shared use of open space and facilities (LSPS Action 13.1, pages 68-9). Confirm with DPIE if Council’s Community Assets Needs Strategy (under development) requires approval to inform LEP updates.
<p>7. Local character</p> <p><i>Planning Priority E6, Action 18 requires recognising and celebrating the character of a place and its people</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’s Local Character and Place

⁷ Standard dwellings relate to those monitored via DPIE’s housing monitor (ie. 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>

⁸ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Inner-West.pdf>



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<i>throughout planning, design, development and management to deliver great places.</i>	<p>Guideline (2019) and Government Architect NSW's Better Placed: An integrated design policy for the built environment of New South Wales (2017).</p> <ul style="list-style-type: none"> • Consult with DPIE on the approach to implementing local character.
<p>8. Place-based planning for local centres</p> <p><i>Planning Priority E6, Action 21 requires place-based planning to support the role of centres as a focus for connected neighbourhoods.</i></p>	<ul style="list-style-type: none"> • Consult with DPIE on place-based planning for local centres. • Place-based planning should have regard to the findings of the Local Housing Strategy.
<p>9. Heritage</p> <p><i>Planning Priority E6, Action 20 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.
Productivity	
<p>10. Industrial and employment lands strategy</p> <p><i>Planning Priority E12, Action 51 requires Inner West Council to retain and manage industrial and urban service land in line with the Principles for managing industrial and urban services land in the Eastern City District Plan.</i></p>	<ul style="list-style-type: none"> • Note: The Eastern City District Plan identifies industrial and urban services land in the Inner West as <i>Retain and Manage</i>. • Note: DPIE and the Commission previously advised Council its Employment and Retail Lands Strategy would require DPIE approval to inform LEP updates.
<p>11. A stronger and more competitive Harbour CBD</p> <p><i>Planning Priority E7, Actions 23-25 require councils to prioritise strategic land use and infrastructure plans to support the Harbour CBD.</i></p>	<ul style="list-style-type: none"> • Work with relevant State agencies and neighbouring councils on more detailed strategic and statutory planning to support the Harbour CBD.
<p>12. Health and education precincts and the Innovation Corridor</p> <p><i>Planning Priority E8, Actions 26-28 require councils and others to facilitate</i></p>	<ul style="list-style-type: none"> • Work with relevant State agencies and neighbouring councils on more detailed strategic and statutory planning to implement the vision for the



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<i>the Innovation Corridor including the Camperdown-Ultimo health and education precinct.</i>	Camperdown-Ultimo Collaboration Area as part of the Innovation Corridor.
<p>13. International trade gateways</p> <p><i>Planning Priority E9, Action 31(n) requires the development of a strategy for the managements of port and related land side activities at Glebe Island as part of the master planning of the Bays Precinct.</i></p>	<ul style="list-style-type: none"> • Collaborate with relevant State agencies and neighbouring councils on the future detailed planning for Glebe Island.
Sustainability	
<p>14. Resilience to natural and urban hazards</p> <p><i>Planning Priority E20 requires councils to respond to the impacts of climate change (Action 74) and limit the intensification of development in existing urban areas most exposed to hazards (Action 75).</i></p>	<ul style="list-style-type: none"> • Collaborate with the Commission, other relevant State agencies and neighbouring councils to strengthen approaches to resilience in Council's strategies, plans and programs, particularly the: <ul style="list-style-type: none"> ○ Draft Climate + Renewables Strategic Plan ○ Community Assets Needs Strategy ○ Open Space and Recreation Strategy ○ Going Places: An Integrated Transport Strategy for Inner West.
<p>15. Open space strategy</p> <p><i>Planning Priority E18, Action 67 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 Community Assets Needs Strategy and Open Space and Recreation Strategy (both under development) require approval to inform LEP updates.
<p>16. BASIX</p> <p><i>Planning Priority E19 requires councils to reduce carbon emissions and manage energy, water and waste efficiently.</i></p>	<ul style="list-style-type: none"> • Consult with DPIE regarding changes sought to BASIX standards.



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Implementation	
<p>17. Planning framework <i>Section 6 Implementation, Figure 26.</i></p>	<ul style="list-style-type: none"> Note: 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>18. Updates to LSPS <i>Planning Priority E21 requires councils to prepare local strategic planning statements informed by local strategic planning.</i></p>	<ul style="list-style-type: none"> 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. Note: The LSPS includes a commitment to commence a review of the LSPS every seven (7) years in accordance with the EP&A Act. The draft LSPS indicates that the 4-year review of the Community Strategic Plan presents an opportunity for interim reviews of the LSPS.
<p>19. Monitoring and review - Implementation <i>Planning Priority E21, Action 77 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>20. Monitoring and review - Performance indicators <i>Planning Priority E22, Action 78 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 the LGA level⁹.

⁹ Source: <https://www.greater.sydney/pulse-of-greater-sydney>