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

Thank you for submitting Liverpool 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 Liverpool 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, Centres and Corridors Strategy, Industrial and Employment Lands Strategy and Rural Lands 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 Liverpool 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, Western Sydney Aerotropolis Plan and Warwick Farm racing precinct structure plan are finalised.

While the LSPS will provide the strategic framework for local land use planning decisions in Liverpool, decisions on any changes to specific land use zones will need to be reviewed in accordance with s.3.34 of the EP&A Act, and determined by the relevant planning proposal authority.

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 Liverpool 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

30 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 Liverpool City Council's 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 and city-serving transport initiatives in Future Transport 2056¹ including: <ul style="list-style-type: none"> ○ 0-10 year committed initiatives in progress²: Western Sydney Infrastructure Plan including the new M12 Motorway, Western Sydney Growth Roads Program, Access to Moorebank Intermodal Terminal, North-south rail link in Western Parkland City: St Marys – WSA-Badgerys Creek Aerotropolis. ○ 0-10 year initiatives for investigation in progress: Infrastructure to support rapid bus connections and improved bus connections between Western Sydney Airport, Aerotropolis and Penrith, Liverpool, Blacktown and Campbelltown-Macarthur, Western Parkland City bus interchange, ○ 0-10 year initiatives for investigation not yet commenced: Western Sydney Airport-Badgerys Creek Aerotropolis connected and autonomous vehicle (CAV) zone, More Trains, More Services program - T2, T5. ○ 10-20 year initiatives for investigation: Additional capacity on Southern Sydney Freight Line (in collaboration with Commonwealth).

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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	<ul style="list-style-type: none"> ○ 20+ years visionary initiative: Sydney Metro City and Southwest extension to Liverpool, M5 motorway extension from Liverpool to Outer Sydney Orbital, Outer Sydney Orbital (motorway and freight rail) from WSA-Badgerys Creek Aerotropolis to M31 Hume Motorway and South 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 draft LSPS includes Council-led transport infrastructure initiatives. These initiatives will require further investigation to determine alignment with TfNSW's strategic planning priorities. These include: <ul style="list-style-type: none"> ○ the proposed Fifteenth Avenue Smart Transit (FAST) Corridor; ○ direct connection Liverpool to Sydney CBD via Holsworthy; ○ Smart Transit Corridor extension to Holsworthy; ○ T-way expansions; and ○ Strategic cycle routes.
<p>3. Western Sydney Aerotropolis</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> <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>	<ul style="list-style-type: none"> ● Note: The draft Western Sydney Aerotropolis Plan, Discussion Paper on a proposed State Environmental Planning Policy and draft Western Sydney Aerotropolis Development Control Plan Phase 1 have recently been exhibited. ● Note: The Western Sydney Planning Partnership has the responsibility for delivering the Final Plan and Precinct Plans within the Western Sydney Aerotropolis to the Minister for Planning and Public Spaces. ● Continue to work with the Western Sydney Planning Partnership, the Western City and Aerotropolis Authority and Department of Planning, Infrastructure and Environment (DPIE), to deliver the Western Economic Corridor, implement the South Creek urban design principles and deliver new communities that support:



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	<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. South West Growth 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> <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>	<ul style="list-style-type: none"> ● Note: The DPIE has published a new approach to precincts³ and confirms the South West Growth Area as an area for strategic planning, and Leppington Town Centre as a Council-led rezoning. ● Work with DPIE on the planning of precincts in the South West Growth Area to deliver the Western Economic Corridor, 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>5. Liverpool collaboration area</p> <p><i>Planning Priority W2, Action 7 requires councils to identify, prioritise and deliver Collaboration Areas.</i></p>	<ul style="list-style-type: none"> ● Work with DPIE to investigate approaches to support the operation and growth of the Liverpool Innovation Precinct, including: <ul style="list-style-type: none"> ○ approaches outlined in the Liverpool Innovation Precinct Land Use Analysis and Precinct Strategy⁴ and ○ the proposed City Centre Public Domain Master Plan⁵ ● Note: Action 10.2 of the LSPS commits to developing a structure plan and planning proposal for the

³ Source: <https://www.planning.nsw.gov.au/Plans-for-your-area/A-new-approach-to-precincts>

⁴ Source: <https://www.liverpoolinnovation.com.au/>

⁵ Source: Collaboration Areas – Liverpool Place Strategy



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	<p>Warwick Farm racing precinct. In this context Council should support:</p> <ul style="list-style-type: none"> ○ the precinct's role as part of the larger Strategic Centre and proximity to the adjoining institutions in the Innovation Precinct and the Warwick Farm Racecourse; ○ prepare the structure plan to inform the appropriate land use zones; and ○ consult with the Commission, DPIE, TfNSW and other relevant State agencies on the preparation of a structure plan.
Liveability	
<p>6. 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 Guidelines⁶ require Council's Local Housing Strategy to be approved by DPIE. • As set out in the Local Housing Strategy Guideline, 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 Scheme⁷. • 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.
<p>7. 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</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.

⁶ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/Local-Housing-Strategy-Guideline-and-Template.pdf>

⁷ Source: <https://www.planning.nsw.gov.au/Policy-and-Legislation/Housing/Diverse-and-affordable-housing/-/media/C6F1D0F0359C4AB7A28C90BE7DEEE636.ashx>



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<p><i>agreed) housing supply targets for each local government area.</i></p>	<ul style="list-style-type: none"> • The Commission notes: <ul style="list-style-type: none"> ○ Council’s housing analysis indicates that 9,982 additional dwellings will be required to meet demand based on population projections between 2021 and 2026.⁸ ○ DPIE monitoring⁹ shows the current pipeline for the period 2019/20 to 2023/24 is 12,750 dwellings. • In this context, Council is to show how it can meet an indicative draft range for 6-10 year housing target for the period 2021/22 to 2025/26 of 11,000 to 12,500 dwellings as part of its Local Housing Strategy. • 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 dwellings¹⁰ (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 projections¹¹ are subject to review over time and will be managed through updates to the Region and district plans.

⁸ Source: Liverpool draft Local Strategic Planning Statement p.44

⁹ Source: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Forecast-data>

¹⁰ 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>

¹¹ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Liverpool.pdf>



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<p>8. Local contributions</p> <p><i>Planning Priority W3, Action 9 requires councils to deliver social infrastructure that reflects the needs of the community now and in the future.</i></p>	<ul style="list-style-type: none"> Consult with DPIE regarding local contribution rates and the essential works list.
<p>9. 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>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. Confirm with DPIE if Council's proposed Centre's and Corridors Strategy will require approval to inform LEP updates.
<p>Productivity</p>	
<p>11. Industrial and employment lands strategy</p> <p><i>Planning Priority W10, Action 52 requires Liverpool 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> <p><i>Planning Priority W10, Action 53 requires Liverpool Council to plan and manage industrial and urban services land, in line with the principles for managing industrial and urban services land by creating additional industrial and urban services land where required in land release areas.</i></p>	<ul style="list-style-type: none"> Note: The Western City District Plan identifies industrial and urban services land in Liverpool as part 'Review and manage' and part 'Plan and manage'. Review and manage industrial and urban services land in existing urban areas of Liverpool, in line with the principles for managing industrial and urban services land, as part of Council's Industrial and Employment Lands Strategy. This review will help inform the Commission's work on Action 11 of the GSRP. Confirm with DPIE if Council's Industrial and Employment Lands Strategy will require approval to inform LEP updates.



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<p>12. Metropolitan clusters and strategic centres</p> <p><i>Planning Priority W9 Action 42 requires Liverpool Council to grow and strengthen the metropolitan cluster at Liverpool.</i></p> <p><i>Planning Priority W11 Action 56 requires councils to provide access to jobs, goods and services in centres, Action 57 requires councils to Create new centres in line with the principles for Greater Sydney's 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"> • Consult with DPIE during the preparation of Council's Centres and Corridor Strategy and confirm with DPIE if this strategy will require approval to inform LEP updates. • Continue to work with the Commission and relevant stakeholders to progress the Liverpool Collaboration Area Place Strategy.
<p>Sustainability</p>	
<p>13. Rural lands strategy</p> <p><i>Planning Priority W17 requires councils to maintain or enhance the values of the Metropolitan Rural Area using place-based planning to deliver targeted environmental, social and economic outcomes (Action 78) and limit urban development to within the Urban Area (Action 79).</i></p>	<ul style="list-style-type: none"> • Collaborate with adjoining Councils to consider opportunities to support the growth of the agribusiness sector as part of any future work on rural lands. • Consult with DPIE during the preparation of Council's Rural Lands Strategy and confirm with DPIE if this strategy will require approval to inform LEP updates.
<p>14. BASIX</p> <p><i>Planning Priority W19 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.
<p>15. 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 intensification of development in areas most exposed to hazards (Action 88) and mitigate the urban heat island effect (Action 89).</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 and plans, including the: <ul style="list-style-type: none"> ○ Rural Lands Strategy; ○ Strategic Urban Biodiversity Framework; ○ Transport and Mobility Plan; and ○ other place-based plans.



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<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> <p><i>Planning Priority W20, Action 90 requires Liverpool Council to respond to the direction for managing flood-risk in the Hawkesbury-Nepean Valley as set out in Resilient Valley, Resilient Communities – Hawkesbury-Nepean Valley Flood Risk Management Strategy.</i></p>	<ul style="list-style-type: none"> • Consult with DPIE and State agencies to prepare flood and fire risk management plans. • Continue to consult with State agencies to manage flood risk in the Hawkesbury-Nepean Valley and develop guidance on land use limitations to reflect the flood risk.
Implementation	
<p>17. 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>18. 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 includes a commitment to “conduct a review of the LSPS in 2021 and again every four years to align the review period with Council’s overarching community strategic planning and existing Integrated Planning and Reporting framework under the Local Government Act”.¹² • 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.

¹² Source: Liverpool draft Local Strategic Planning Statement, p.72



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<p>19. 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>20. 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 levels¹³.

¹³ Source: <https://www.greater.sydney/pulse-of-greater-sydney>