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Letter of Support: North Sydney Council draft Local Strategic Planning Statement

Thank you for submitting the North Sydney 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 North 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 North Sydney Council's draft Local Strategic Planning Statement (March 2020) as being consistent with the Greater Sydney Region Plan and North 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 place-based planning studies for the Ward Street Precinct, Northern 'Civic' Precinct and Military Road Corridor as well as finalisation of the draft St Leonards and Crows Nest 2036 Plan) which will further support your LSPS and future updates.

The Commission's support is based, in part, on Council's intent to deliver the North 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 the Local Housing Strategy for North Sydney 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 North Sydney 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 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

Peter Poulet
Delegate for North District Commissioner
Assurance Panel Member

20 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 North Sydney Council draft Local Strategic Planning Statement:

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

North District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
Infrastructure and Collaboration	
<p>1. State-led transport investigations and projects</p> <p><i>Planning Priority N1, Action 3 seeks to align forecast growth with infrastructure.</i></p>	<ul style="list-style-type: none"> Continue to consult with Transport for New South Wales (TfNSW) on planning for city-shaping transport initiatives in Future Transport 2056¹ including: <ul style="list-style-type: none"> 0-10 year committed initiatives in progress²: Sydney Metro City and South West (Victoria Cross and Crows Nest stations); and Western Harbour Tunnel and Beaches Link.
Liveability	
<p>2. Shared use agreements</p> <p><i>Planning Priority N3, Action 10 seeks to optimise the use of available public land for social infrastructure.</i></p>	<ul style="list-style-type: none"> Work with the Department of Education on potential shared use agreements for school grounds and facilities to provide additional open space and community spaces.
<p>3. Local Housing Strategy</p> <p><i>Housing analysis</i></p> <p><i>Planning Priority N5, Action 17 requires councils to prepare Local Housing Strategies.</i></p> <p><i>Planning Priority N5, 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 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.

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>

³ 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 Scheme⁴.
<p>4. Local Housing Strategy</p> <p><i>6-10 year housing target</i></p> <p><i>Planning Priority N5, 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 and housing strategies. The Commission notes: <ul style="list-style-type: none"> Council is on track to meet the 0-5 year target for the period 2016/17 – 2020/21 of 3,000 dwellings. Council’s housing analysis indicates a 6-10 year delivery forecast for the period 2022 to 2026 of 2,835 dwellings⁵. DPIE monitoring⁶ shows the current housing supply forecast for the period 2019/20 to 2023/24 is 2,600 dwellings. 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 3,000 to 3,500 dwellings as part of its 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 of non-standard dwellings⁷

⁴ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/guideline-sepp70-developing-affordable-housing-contribution-scheme-2019-02-28.pdf>

⁵ Source: North Sydney Council’s draft Local Strategic Planning Statement (assurance version) Page 54

⁶ Source: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Forecast-data>

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>



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	<p>(seniors housing, boarding houses and secondary dwellings) in relation to this indicative range.</p> <ul style="list-style-type: none"> Note: The NSW Government’s strategic documents outline the direction for planning land use, service and infrastructure delivery across NSW. Population projections are subject to review over time and will be managed in the medium term through updates to Region and district plans⁸.
<p>5. Local character</p> <p><i>Planning Priority N6, Action 19(e) requires recognising and celebrating of 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’s Local Character and Place Guideline (2019) and Government Architect NSW’s Better Placed: An integrated design policy for the built environment of New South Wales (2017). Consult with DPIE on the approach to implementing local character.
<p>6. Place based planning for local centres</p> <p><i>Planning Priority N6, Action 19 requires a place-based and collaborative approach throughout planning, design, development and management to deliver great places.</i></p> <p><i>Planning Priority N6, 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 TfNSW, DPIE and Mosman Council on place-based planning for the Military Road Corridor and local centres in response to planned State infrastructure investment. Place-based planning should have regard to findings of the Local Housing Strategy.
<p>7. Heritage</p> <p><i>Planning Priority N6, 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.

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



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Productivity	
<p>8. North Sydney CBD</p> <p><i>Planning Priority N7, Action 24 requires Council to grow economic development in the North Sydney CBD as part of growing a stronger and more competitive Harbour CBD. Action 24(a) and (b) require Council to maximise land use opportunities provided by the new station and grow jobs in the centre and maintain a commercial core. Action 24(h) requires Council to create capacity to achieve job targets by reviewing the current planning controls.</i></p>	<ul style="list-style-type: none"> • Confirm with DPIE if Council's Ward Street Precinct and Northern 'Civic' Precinct studies require approval to inform LEP updates. • Undertake monitoring and review of North Sydney CBD's commercial floor space capacity to determine whether future LEP updates are required to optimise investment in Sydney Metro and support realisation of the high jobs target.
<p>9. St Leonards strategic centre and health and education precinct</p> <p><i>Planning Priority N9, Action 31 requires councils and State agencies to deliver and implement a Place Strategy and Infrastructure Plan for the St Leonards health and education precinct.</i></p> <p><i>Planning Priority N9, Action 34 seeks to strengthen St Leonards Strategic Centre through approaches that (a) leverage the new Sydney Metro station to delivery additional employment capacity and (d) protect and enhance Willoughby Road's village character and retail/restaurant strip.</i></p>	<ul style="list-style-type: none"> • Work with DPIE, Lane Cove and Willoughby councils to finalise and implement the St Leonards and Crows Nest 2036 Plan.
<p>10. Industrial and urban service land</p> <p><i>Planning Priority N11, Action 46 requires councils to retain and manage industrial and urban services land, in line with principles for managing industrial and urban services land in the North District Plan.</i></p>	<ul style="list-style-type: none"> • Note: The North District Plan identifies industrial and urban services land in North Sydney as <i>Retain and Manage</i>.
<p>11. Freight</p>	<ul style="list-style-type: none"> • Consult with TfNSW on Council's Local Deliveries and (Regional) Freight Action Plan.



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<p><i>Planning Priority N14, Action 60 requires councils, other planning authorities, State agencies and State-owned corporations to optimise the efficiency and effectiveness of the freight handling and logistics network.</i></p>	
<p>Sustainability</p>	
<p>12. Open Space Strategy <i>Planning Priority N20, Action 73 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 Open Space Strategies and planning studies require approval to inform LEP updates.
<p>13. Precinct based energy generation <i>Planning Priority N21, Action 75 requires councils to support precinct-based initiatives to increase renewable energy generation, and energy and water efficiency, especially in Planned Precincts.</i></p>	<ul style="list-style-type: none"> • Support opportunities for precinct-based energy and water initiatives in the St Leonards and Crows Nest Planned Precinct.
<p>14. BASIX <i>Planning Priority N21, seeks 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. Flooding and bushfire <i>Planning Priority S22, Action 80 requires councils to support initiatives that respond to the impacts of climate change.</i></p>	<ul style="list-style-type: none"> • Continue to work with State agencies to manage flood and fire risk.
<p>16. Resilience to natural and urban hazards <i>Planning Priority N22, Actions 80 and 81 require councils to support initiatives that respond to the impacts of climate change and to limit the intensification of development in existing urban areas most exposed to hazards.</i></p>	<ul style="list-style-type: none"> • Collaborate with relevant State agencies and neighbouring councils to strengthen approaches to resilience in council's strategies, plans and programs, particularly: <ul style="list-style-type: none"> ○ Any future review of Council's Open Space Strategies; and



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	<ul style="list-style-type: none"> ○ Place-based planning including planning studies.
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 N23 requires councils to prepare local strategic planning statements informed by local strategic planning.</i></p>	<ul style="list-style-type: none"> ● Note: the LSPS indicates a review of the LSPS could be undertaken in line with the next review of the Community Strategic Plan (by June 2021). ● 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.
<p>19. Monitoring and review - Implementation <i>Planning Priority N23, Action 83 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 N23, Action 84 requires the development of performance indicators in consultation with State agencies and councils that measure the 10 Directions to inform inter-agency, NSW Government and local government decision-making.</i></p>	<ul style="list-style-type: none"> ● Council is encouraged to apply the performance indicators in the <i>Pulse of Greater Sydney</i> which are available at the LGA level⁹.

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