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Letter of Support: Strathfield Council draft Local Strategic Planning Statement

Thank you for submitting Strathfield 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 Strathfield Council's draft Local Strategic Planning Statement (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 intent to undertake significant work to develop a strategic planning evidence base (including the Local Housing Strategy, Strathfield Employment Land Strategy, Commercial Centres Study and Open Space and Recreation 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 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 Strathfield 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 Strathfield 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 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

27 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 Strathfield Council's draft Local Strategic Planning Statement:

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

Eastern City 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 E1, Action 3 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: WestConnex, Parramatta Road public transport improvements and Sydney Metro West; 0-10 year initiative for investigation: More Trains, More Services Program – T1, T2; and 20+ years visionary initiative: Train/mass transit link Macquarie Park to Hurstville via Rhodes
<p>2. Shared use agreements</p> <p><i>Planning Priority E3, Action 9 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 the potential for joint and shared use of facilities and land.
Liveability	
<p>3. Local Housing Strategy - Housing analysis</p> <p><i>Planning Priority E5, Action 16 requires councils to prepare Local Housing Strategies.</i></p> <p><i>Planning Priority E5, Action 17 requires councils to prepare Affordable Rental Housing Target Schemes following the</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>



Eastern City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
<p><i>development of implementation arrangements.</i></p>	<ul style="list-style-type: none"> Consider additional housing opportunities, outside of corridors and precincts through the development of their Local Housing Strategy, including provision of diverse housing types such as medium density housing. Note: The Local Housing should be informed by the NSW Government's Guideline for Developing an Affordable Housing Contribution Scheme⁴.
<p>4. Local Housing Strategy - <i>6-10 year housing target</i></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"> Councils housing analysis⁵ indicates a 6-10 year target for the period 2021-2026, ranging from 4,800 and 7,300 dwellings. DPIE monitoring⁷ shows the current housing supply forecast for the period 2019/20 to 2023/24 is 3,800 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 3,500 – 3,800 dwellings as part of its Local Housing Strategy. Testing of this indicative range is to include a preliminary assessment of any relevant NSW Government investment decisions in consultation with State agencies. Consideration should be given to the outcomes of technical studies, currently being undertaken by DPIE, on the impact on housing delivery, as part of the 'Parramatta Road Corridor Urban Transformation Strategy'. Where relevant data is available, councils are to identify the contribution of non-standard dwellings⁸

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: Strathfield 2040 Draft Local Strategic Planning Statement, p51

⁶ Source: Strathfield 2040 draft Local Strategic Planning Statement, p51

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

⁸ 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 housing, boarding houses and affordable rental housing (secondary dwellings). For more information refer to:



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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 projections⁹ are subject to review over time and will be managed through updates to the Region and district plans.
<p>5. Local character</p> <p><i>Planning Priority E6, Action 18 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'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 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"> Confirm with DPIE if Council's Commercial Centres Study, Strathfield Town Centre Masterplan, Parramatta Road Activation Strategy and Strathfield Town Centre Place Strategy require approval to inform LEP updates. Consult with DPIE on place-based planning for local centres. Place-based planning should have regard to findings of the Local Housing Strategy and Local Employment and Productivity Strategy.
<p>7. 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.
<p>8. Local contributions</p> <p><i>Planning Priority E3, Action 9 requires councils to deliver social infrastructure that reflects the needs of the community.</i></p>	<ul style="list-style-type: none"> Consult with DPIE when developing Council's Development Contributions and Voluntary Planning Agreements Framework.

<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-Strathfield.pdf>



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Productivity	
<p>9. Industrial and employment lands strategy</p> <p><i>Planning Priority E12, Action 51 requires Strathfield Council to retain and manage industrial and urban service land in line with the Principles for managing industrial 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 Strathfield as <i>Retain and manage</i>. Confirm with DPIE if Council's Employment Lands Strategy requires approval to inform LEP updates.
Sustainability	
<p>10. 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 areas most exposed to hazards (Action 75).</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 Council's Resilience Strategy and other strategies and plans, including the: <ul style="list-style-type: none"> Open Space and Recreation Strategy; Biodiversity Strategy; Climate Change Adaption and Resilience Strategy; and other place-based plans. Continue to work with State agencies to manage flood and the urban heat island effect and continue to address these through Council's program of local strategic and place-based planning.
<p>11. 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"> It is noted that Council's contribution to the Premier's Priority to '<i>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</i>'. Confirm with DPIE if Council's Open Space and Recreation Strategy requires approval to inform LEP updates.
<p>12. BASIX</p> <p><i>Planning Priority E19, Action 68 and 69 require Council to support initiatives that contribute to the aspirational objective of achieving net-zero emissions by 2050 and including precinct-based initiatives.</i></p>	<ul style="list-style-type: none"> Consult with DPIE regarding changes sought to BASIX standards.



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Implementation	
<p>13. 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>14. 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.
<p>15. 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"> Note: The draft LSPS identifies that the LSPS will be revised during each new Council term (every four years). Progress on the implementation of the District Plan will be reviewed and monitored with a focus on actions that support LEP updates.
<p>15. 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 level¹⁰.

¹⁰ Source: <https://www.greater.sydney/pulse-of-greater-sydney>