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## Letter of Support: Bayside Council draft Local Strategic Planning Statement

Thank you for submitting Bayside 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* (EP&A Act).

**We confirm that the Commission supports Bayside 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 work already undertaken informing your first LSPS. It also reflects that work is still in progress (including a Local Housing Strategy, Centres and Employment Study, Transport Strategy and Social Infrastructure 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 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 a Local Housing Strategy for Bayside 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 Bayside 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](mailto:Amanda.Harvey@planning.nsw.gov.au).

Yours sincerely,

**Lucy Turnbull AO**  
**Chief Commissioner**  
**Chair of Assurance Panel**  
**Commission Delegate**

**Dr Deborah Dearing**  
**Eastern District Commissioner**  
**Assurance Panel Member**

**18 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 Bayside 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><b>Infrastructure and Collaboration</b></p>	
<p><b>1. State-led transport investigations and projects</b></p> <p><i>Planning Priority E1, Action 3 seeks to align forecast growth with infrastructure.</i></p>	<ul style="list-style-type: none"> <li>• Continue to consult with Transport for NSW (TfNSW) on planning for city-shaping and city-serving transport initiatives in Future Transport 2056<sup>1</sup> including:               <ul style="list-style-type: none"> <li>○ 0-10 year committed initiatives in progress<sup>2</sup>: Sydney Airport road upgrades, WestConnex, More Trains, More Services program (T4, T8), F6 Extension Stage 1 WestConnex to President Ave, Kogarah;</li> <li>○ 0-10 year initiatives for investigation in progress: Duplication of Port Botany freight rail line. The F6 Extension - Kogarah to Loftus and Green Square to La Perouse rapid bus link have not commenced at this time; and</li> <li>○ 10-20 year initiatives for investigation: Mass transit/train link to South East, Parramatta to Kogarah mass transit / train link, completion of Maldon to Dombarton railway line (allow T4 frequency improvements).</li> </ul> </li> </ul>
<p><b>2. Council-led transport initiatives</b></p> <p><i>Planning Priority E1, Planning for a city supported by infrastructure.</i></p>	<ul style="list-style-type: none"> <li>• Note: The draft LSPS includes Council-led transport infrastructure initiatives related to preferred future mass transit and station locations. These initiatives require further investigation to determine alignment with TfNSW's strategic planning priorities.</li> </ul>
<p><b>3. Shared use agreements</b></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"> <li>• Work with the Department of Education on potential shared use agreements for school grounds and facilities to provide additional open space and community spaces.</li> </ul>

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

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



Eastern District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
<b>Liveability</b>	
<p><b>4. Local contributions</b></p> <p><i>Planning Priority E3, Action 8 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"> <li>Consult with the Department of Planning, Industry and Environment (DPIE) regarding local contribution rates and the essential works list.</li> </ul>
<p><b>5. Local Housing Strategy</b></p> <p><i>Housing analysis</i></p> <p><i>Planning Priority E5, Action 16 requires councils to prepare Local Housing Strategies.</i></p> <p><i>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"> <li>Note: The NSW Government’s Local Housing Strategy Guidelines require Council’s Local Housing Strategy to be approved by DPIE.</li> <li>As set out in the Local Housing Strategy Guideline<sup>3</sup>, 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.</li> <li>Note: The Local Housing Strategy should be informed by the NSW Government’s Guideline for Developing an Affordable Housing Contribution Scheme.<sup>4</sup></li> </ul>
<p><b>6. Local Housing Strategy</b></p> <p><i>6-10 Year housing target</i></p> <p><i>Planning Priority E5, Action 16(b) of the North District Plan 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"> <li>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 (LEP) and housing strategies. The Commission notes: <ul style="list-style-type: none"> <li>Council’s 0-5 year housing target for the period 2016 to 2021 is 10,150 dwellings<sup>5</sup>, noting that 6,247 dwellings have been completed in Bayside between July 2016-September 2018<sup>6</sup>.</li> <li>Council’s housing analysis recognises the NSW Government population projections which indicate that Bayside will need around 28,000 additional dwellings between 2016 and 2036 to accommodate projected population growth<sup>7</sup>.</li> </ul> </li> </ul>

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

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

<sup>5</sup> Source: Eastern City District Plan, page 42

<sup>6</sup> Source: Bayside Housing Strategy Background Paper, March 2019, p25

<sup>7</sup> Ibid



Eastern District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
	<ul style="list-style-type: none"> <li>○ DPIE monitoring<sup>8</sup> shows the current housing supply forecast for the period 2019/20 to 2023/24 is 10,000 dwellings.</li> <li>● In this context council is to show how they can meet an indicative draft range for 6-10 year housing target for the period 2021/22 to 2025/26 of 8,500-10,500 dwellings as part of its Local Housing Strategy and relevant LEP updates.</li> <li>● Testing this indicative range is to include a preliminary assessment of any relevant State Government investment decisions in consultation with State agencies.</li> <li>● Where relevant data is available, councils are to identify the contribution of non-standard dwellings (seniors housing, boarding houses and secondary dwellings) in relation to this indicative range.<sup>9</sup></li> <li>● 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 Plans<sup>10</sup>.</li> </ul>
<p><b>7. Local character</b></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"> <li>● 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 the Government Architect NSW’s Better Placed: An integrated design policy for the built environment of New South Wales (2017).</li> <li>● Consult with DPIE on the approach to implementing local character.</li> </ul>
<p><b>8. Place-based planning for local centres</b></p> <p><i>Planning Priority E6, Action 21, requires place-based planning to support the role of centres as a</i></p>	<ul style="list-style-type: none"> <li>● Consult with DPIE on place-based planning for local centres, including testing the amount of retail floor space to meet future demand.</li> </ul>

<sup>8</sup> Source: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Forecast-data>

<sup>9</sup> 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).

<sup>10</sup> Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-fags/Research-and-demography/Population-projections/2019-Bayside.pdf>



Eastern District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
<i>focus for connected neighbourhoods.</i>	<ul style="list-style-type: none"> <li>Place-based planning should have regard to findings of the Local Housing Strategy and Centres and Employment Land Strategy.</li> </ul>
<p><b>9. Heritage</b></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"> <li>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.</li> </ul>
<b>Productivity</b>	
<p><b>10. Industrial and employment lands strategy</b></p> <p><i>Planning Priority E12, Action 51 requires Bayside Council to retain and manage industrial and urban services land in line with the Principles for managing industrial land in the Eastern City District.</i></p>	<ul style="list-style-type: none"> <li>Note: The Eastern City District Plan identifies industrial and urban services land in Bayside as <i>Retain and Manage</i>. In updating LEPs, councils are to conduct a strategic review of industrial lands.</li> <li>Confirm with DPIE if Council's Centres and Employment Land Strategy requires approval to inform LEP updates.</li> </ul>
<b>Sustainability</b>	
<p><b>11. Open space strategy</b></p> <p><i>Planning Priority E18, Action 67 requires councils to maximise the use of existing open space and protect, enhance and expand public open space.</i></p>	<ul style="list-style-type: none"> <li>Consider 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>.</li> <li>Confirm with DPIE if Council's Social Infrastructure Strategy 2019 requires approval to inform LEP updates.</li> </ul>
<p><b>12. BASIX</b></p> <p><i>Planning Priority E19 requires councils to support initiatives that contribute to the aspirational objective of achieving net-zero emissions by 2050, including precinct-based initiatives.</i></p>	<ul style="list-style-type: none"> <li>Consult with DPIE regarding changes sought to BASIX standards.</li> </ul>
<p><b>13. Resilience to natural and urban hazards</b></p> <p><i>Planning Priority E20, Actions 74 and 75 require councils to support initiatives that respond to the impacts of climate change and to limit the intensification of</i></p>	<ul style="list-style-type: none"> <li>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"> <li>Environmental Review of Planning Controls;</li> <li>Centres and Employment Land Strategy;</li> </ul> </li> </ul>



Eastern District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
<p><i>development in existing urban areas most exposed to hazards.</i></p>	<ul style="list-style-type: none"> <li>○ Flooding and Stormwater Study;</li> <li>○ Land Use Limitation Study; and</li> <li>○ other place-based plans.</li> </ul> <ul style="list-style-type: none"> <li>● Continue to work with State agencies to manage flood, coastal erosion and the urban heat island effect, and continue to address these through Council's program of local strategic and place-based planning.</li> </ul>
<b>Implementation</b>	
<p><b>14. Planning framework</b> <i>Section 6 Implementation, Figure 26.</i></p>	<ul style="list-style-type: none"> <li>● Note: Notwithstanding the content of the LSPS, Ministerial Directions under Section 9.1 of the EP&amp;A Act and State Environmental Planning Policies continue to apply to the LGA.</li> </ul>
<p><b>15. Updates to LSPS</b> <i>Planning Priority E21 requires Council to preparing local strategic planning statements informed by local strategic planning.</i></p>	<ul style="list-style-type: none"> <li>● Note: The LSPS includes a commitment for Council to review its LSPS in the next term of a new Council (from September 2020).</li> <li>● 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.</li> </ul>
<p><b>16. Monitoring and review</b> <i>Implementation</i> <i>Planning Priority E21, Action 77 LEP Review and Section 3.8 (4a) EP&amp;A Act LEP Updates.</i></p>	<ul style="list-style-type: none"> <li>● Progress on the implementation of the District Plan will be reviewed and monitored with a focus on actions that support LEP Updates.</li> </ul>
<p><b>17. Monitoring and review</b> <i>Performance indicators</i> <i>Planning Priority E21, 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"> <li>● Council is encouraged to apply the performance indicators in the recently released <i>Pulse of Greater Sydney</i> which includes data available at the LGA level.<sup>11</sup></li> </ul>

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