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Letter of Support: City of Canterbury Bankstown draft Local Strategic Planning Statement

Thank you for submitting the City of Canterbury Bankstown'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 South 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 the City of Canterbury Bankstown's draft Local Strategic Planning Statement (March 2020) as being consistent with the Greater Sydney Region Plan and South District Plan under Section 3.9(3A) of the EP&A Act.

Our decision on consistency reflects the significant work undertaken to develop a comprehensive strategic planning and evidence base to inform your Local Strategic Planning Statement and deliver the South District Plan.

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 Canterbury Bankstown Council;
- updates to population projections during the preparation of the LSPS;
- 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 the City of Canterbury Bankstown. 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

Peter Poulet
South District Commissioner
Assurance Panel Member

16 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 City of Canterbury Bankstown draft Local Strategic Planning Statement:

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

South 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 S1, 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 Southwest; ○ 0-10 year initiatives for investigation in progress: Parramatta to Bankstown to Hurstville / Kogarah rapid bus link; ○ 10-20 year for investigation initiatives: Parramatta to Kogarah mass transit / train link; and ○ 20+ year visionary initiatives: Train/mass transit link Macquarie Park to Hurstville via Rhodes, extension of South East mass transit/train link to Miranda, a future strategic road corridor linking NorthConnex near the M2 with Greater Parramatta & the F6 in southern Sydney.
<p>2. Council-led transport initiatives</p> <p><i>Planning Priority S1.</i></p>	<ul style="list-style-type: none"> • Note: The 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.
Liveability	
<p>3. Local Housing Strategy - Housing analysis</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).

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 S5, Action 16 requires councils to prepare Local Housing Strategies.</i></p> <p><i>Planning Priority S5, 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"> As set out in the Local Housing Strategy Guidelines³, 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>4. Local Housing Strategy 6-10 year housing target</p> <p><i>Planning Priority S5, 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 and housing strategies. The Commission notes: <ul style="list-style-type: none"> Council’s housing analysis indicates a dwelling target supply for the period 2016 to 2026 of 25,000 dwellings⁵. DPIE monitoring⁶ shows the current housing supply forecast for the period 2019/20 to 2023/24 is 9,250 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 10,500 to 12,500 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. Where relevant data is available, councils are to identify the contribution of non-standard dwellings⁷

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/-/media/Files/DPE/Guidelines/guideline-sepp70-developing-affordable-housing-contribution-scheme-2019-02-28.pdf>

⁵ Source: Canterbury Bankstown Draft Local Strategic Planning Statement, p71

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. It is also noted that the reference to Canterbury Bankstown accommodating 70% of the District's population growth⁹ was based on DPIE's 2016 population projections which had an accompanying implied dwelling demand for 55,250 dwellings for the period 2016-2036.
<p>5. Local character</p> <p><i>Planning Priority S6, Action 18(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 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 S6, Action 18 requires a place-based and collaborative approach throughout planning, design, development and management to deliver great places.</i></p> <p><i>Planning Priority S6, 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 centres (incorporating master planning and precinct planning), including testing: <ul style="list-style-type: none"> Proposed 80/20 split of new housing between centres and suburbs. Proposal for 80% of all new housing to be located within walking distance of a rail or mass transit station. Approach to maintaining local character. Place-based planning should also have regard to findings of the Local Housing Strategy and Employment Lands Strategy.

⁸ <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Canterbury-Bankstown.pdf>. For more information refer to <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Other-forms-of-housing>

⁹ Source: South District Plan, page 70, <https://www.greater.sydney/south-district-plan>.



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	<ul style="list-style-type: none"> • Confirm with DPIE if Council's Employment Lands Strategy requires approval to inform LEP updates.
<p>7. Movement and place <i>Planning Priority S6, Action 18(b) requires councils to recognise and balance the dual function of streets and places for people and movement.</i></p>	<ul style="list-style-type: none"> • Consult with TfNSW on application of the movement and place framework including: <ul style="list-style-type: none"> ○ integrated transport planning for centres; ○ implementation of the Complete Streets Program; and, ○ implementation of the Canterbury Road Review.
<p>8. Heritage <i>Planning Priority S6, 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>9. Collaboration areas <i>Planning Priority S8 requires councils to facilitate health and education precincts (Action 25) and deliver and implement a Place Strategy and Infrastructure Plan for the collaboration area (Action 27).</i></p>	<ul style="list-style-type: none"> • Continue to consult with the Greater Sydney Commission, key stakeholders and other state agencies to implement priorities and actions of the Bankstown CBD and Bankstown Airport Place Strategy¹⁰.
<p>10. Strategic centres <i>Planning Priority S9 requires councils to provide access to jobs, goods and services in centres (Action 28), prioritise strategic land use and infrastructure plans for growing centres (Action 30) and to strengthen Bankstown and Campsie Strategic Centres (Actions 33 and 34).</i></p>	<ul style="list-style-type: none"> • Confirm with DPIE if Council's Employment Lands Strategy requires approval to inform LEP updates. • Confirm with DPIE if Council's master plans and precinct plans require approval to inform LEP updates. • Consider the Bankstown CBD and Bankstown Airport Place Strategy when undertaking master planning for Bankstown CBD and the broader collaboration area. • Consider opportunities to support the South District Plan high jobs targets for Bankstown and Campsie Strategic Centres.
<p>11. Industrial and urban service land</p>	<ul style="list-style-type: none"> • Note: The South District Plan identifies industrial and urban services land in Canterbury Bankstown as <i>Retain and Manage</i>.

¹⁰ Source: <https://www.greater.sydney/project/collaboration-areas>



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<p><i>Planning Priority S10, Action 39 requires councils to retain and manage industrial and urban services land, in line with principles for managing industrial and urban services land in the South District Plan.</i></p>	<ul style="list-style-type: none"> Confirm with DPIE if Council's Employment Lands Strategy requires approval to inform LEP updates.
<p>12. Freight</p> <p><i>Planning Priority S12, Action 56 requires state-owned corporations to optimise the efficiency and effectiveness of the freight handling and logistics network.</i></p>	<ul style="list-style-type: none"> Consult with TfNSW on Council's ideas to optimise freight and commercial movement performance.
Sustainability	
<p>13. Open space strategy</p> <p><i>Planning Priority S16, Action 71 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"> 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'. As part of place-based planning for centres, consider access to open space as set out in the South District Plan. Work with Sydney Water and other stakeholders including DPIE and TfNSW when investigating open space opportunities and access at the Yana Badu Wetlands. Confirm with DPIE if future master planning for Canterbury Racecourse and the Yana Badu Wetlands require approval to inform LEP updates.
<p>14. BASIX</p> <p><i>Planning Priority S17 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. Precinct based energy generation</p> <p><i>Planning Priority S17, Action 73 requires councils to support precinct-based initiatives to increase renewable energy generation, and energy and water efficiency,</i></p>	<ul style="list-style-type: none"> Support opportunities for precinct-based energy and water initiatives including those identified in the Bankstown CBD and Bankstown Airport Place Strategy¹¹.

¹¹Source: <https://www.greater.sydney/project/collaboration-areas>



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<i>especially in Planned Precincts and Collaboration Areas.</i>	
<p>16. Flooding and bushfire</p> <p><i>Planning Priority S18, Action 78 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>17. Resilience to natural and urban hazards</p> <p><i>Planning Priority S18 requires councils to support initiatives that respond to the impacts of climate change (Action 78) and limit the intensification of development in existing urban areas most exposed to hazards (Action 79).</i></p>	<ul style="list-style-type: none"> Collaborate with the relevant State agencies and neighbouring councils to strengthen approaches to resilience, including through Council's: <ul style="list-style-type: none"> Biodiversity Strategic Plan; Urban Forest Strategy; Coastal Management Programs; Catchment and Waterways Plans; Proposed introduction of controls for water sensitive urban design; Proposed introduction of a sustainability clause in Council's LEP; and, water sensitive projects including the proposed pilot project for Campsie.
Implementation	
<p>18. Planning Framework</p> <p><i>Section 6 Implementation, Figure 27.</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. Note: The LSPS includes a commitment to review the LSPS at least every seven years.
<p>19. Updates to LSPS</p> <p><i>Planning Priority S19 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>20. Monitoring and review - Implementation</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.



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<p><i>Planning Priority S19, Action 81 LEP Review and Section 3.8 (4a) EP&A Act LEP Updates.</i></p>	
<p>21. Monitoring and review - Performance indicators</p> <p><i>Planning Priority S20, Action 82 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 the <i>Pulse of Greater Sydney</i> at the LGA level¹².

¹²Source: <https://www.greater.sydney/pulse-of-greater-sydney>