



Ms Monica Barone
Chief Executive Officer
City of Sydney
GPO Box 1591
SYDNEY NSW 2001

Letter of Support: City of Sydney draft Local Strategic Planning Statement

Thank you for submitting City of Sydney'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 City of Sydney'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 significant work undertaken to develop a comprehensive strategic planning and evidence base to inform your LSPS and deliver the Eastern City District Plan.

In this context, the Commission's expectation is that Council will undertake further 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 draft Local Housing Strategy 'Housing for All' for City of 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 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 City of Sydney. 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,

Geoff Roberts
Deputy Chief Commissioner
Chair of Assurance Panel

Dr Deborah Dearing
Eastern City District Commissioner
Commission delegate

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 City of Sydney 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 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 years committed initiatives in progress²: Sydney Metro West, Sydney Metro City & Southwest, WestConnex, Ferry Fleet Replacement Program and Western Harbour Tunnel and Beaches Link; ○ 0-10 years investigation initiatives in progress: More Trains More Services program T4 (Illawarra) and T8 (Airport and South and South Coast Line); and ○ 0-10 years investigation initiatives not commenced: Harbour CBD to Green Square mass transit link, Green Square to La Perouse rapid bus link, Eastern Suburbs to Inner West rapid bus links.
<p>2. Council-led transport initiatives</p> <p><i>Planning Priority E1 Planning for a city supported by infrastructure.</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.

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>



Eastern City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
Liveability	
<p>3. Local Housing Strategy - <i>Housing analysis</i></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 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. • Note: The Local Housing Strategy should be informed by the NSW Government’s Guideline for Developing an Affordable Housing Contribution Scheme⁴. • Continue to liaise with DPIE regarding the implementation of Council’s Planning Proposal: Affordable Housing Review.
<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"> ○ Council’s housing analysis indicates a 6-10 year target for the period 2022 to 2026 of 14,000 private dwellings and 3,033 non-private dwellings⁵.

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/Policy-and-Legislation/Housing/Diverse-and-affordable-housing/-/media/C6F1D0F0359C4AB7A28C90BE7DEEE636.ashx>

⁵ Source: City Plan 2036: Draft Local Strategic Planning Statement, pp47-48



Eastern City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
	<ul style="list-style-type: none"> ○ DPIE monitoring⁶ shows the current housing supply forecast for the period 2019/20 to 2023/24 is 13,650 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 14,000 to 15,000 dwellings as part of the 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. ● The indicative range is broadly consistent with the draft LSPS. It is noted that Council has separately identified the contribution of non-standard dwellings⁷ (seniors housing, boarding houses and secondary dwellings) in relation to this indicative range. ● Note: DPIE has advised Council that it is not required to modify its draft LSPS or draft Local Housing Strategy based on the updated December 2019 population projections.⁸
<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).

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>

⁸ Source: <https://meetings.cityofsydney.nsw.gov.au/documents/s38125/Post%20Exhibition%20-%20Draft%20Local%20Strategic%20Planning%20Statement%20and%20Draft%20Local%20Housing%20Strategy.pdf>, p20



Eastern City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
	<ul style="list-style-type: none"> Consult with DPIE on the approach to implementing local character.
<p>6. 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>Productivity</p>	
<p>7. Industrial and employment lands strategy</p> <p><i>Planning Priority E12, Action 51 requires City of Sydney Council to retain and manage industrial and urban service land in line with the Principles for managing industrial and urban services 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 the City of Sydney as <i>Retain and manage</i>. Confirm with DPIE if Council's proposed Enterprise Area Strategy will require approval to inform LEP updates.
<p>Sustainability</p>	
<p>8. 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 existing urban areas most exposed to hazards (Action 75).</i></p>	<ul style="list-style-type: none"> Continue to demonstrate leadership in strengthening approaches to resilience and collaborate with relevant State agencies and neighbouring councils.
<p>9. 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"> 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, Sports and Recreation Needs Study 2016 requires approval to inform LEP updates.
<p>10. BASIX</p>	<ul style="list-style-type: none"> Consult with DPIE regarding changes sought to BASIX standards.



Eastern City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
<p><i>Planning Priority E19 requires councils to reduce carbon emissions and manage energy, water and waste efficiently.</i></p>	
<p>Implementation</p>	
<p>11. 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>12. 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 new infrastructure investment and employment opportunities, significant changes in projected population growth or changes to the relevant higher order strategic plan. The draft LSPS notes that the City will seek to align the review of the Planning Statement with the five year reviews of the LEP.
<p>13. 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"> Progress on the implementation of the District Plan will be reviewed and monitored with a focus on actions that support LEP Updates.
<p>14. 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 level⁹.

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