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Letter of Support: Cumberland Council Draft Local Strategic Planning Statement

Thank you for submitting the draft Cumberland 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 Central 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 Cumberland Council's draft Local Strategic Planning Statement (February 2020) as being consistent with the Greater Sydney Region Plan and Central 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. The Commission understands that work is still in progress (including the Local Housing Strategy and Affordable Housing Study) that will inform and strengthen future updates to the LSPS.

The Commission's support is based, in part, on Council's intent to deliver the Central 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 Cumberland;
- updates to population projections during the preparation of the LSPS;
- Future Transport 2056's city-shaping and city-serving transport infrastructure;
- interdependencies with State government programs and policies;



- key initiatives that relate to resilience planning; and
- where the LSPS includes 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 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 Cumberland 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 (February 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 Catherine Van Laeren, A/Executive Director, Central River City and Western Parkland City, Department of Planning, Industry and Environment on (02) 9860 1520 or Catherine.VanLaeren@planning.nsw.gov.au.

Yours sincerely,

Lucy Turnbull AO
Chief Commissioner
Chair of Assurance Panel
Commission Delegate

Peter Poulet
Central City District Commissioner
Assurance Panel Member

04 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 draft Cumberland LSPS:

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

Central City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
Infrastructure and Collaboration	
<p>1. State-led transport investigations</p> <p><i>Planning Priority C1, Action 3 Align forecast growth with infrastructure.</i></p>	<ul style="list-style-type: none"> • Continue to consult with TfNSW on transport initiatives in Future Transport 2056¹ including: <ul style="list-style-type: none"> ○ 0-10 years committed initiative in progress: M4 Smart Motorway. ○ 0-10 years investigation initiatives in progress: T-Way to T-Way link, Parramatta to Bankstown to Hurstville/Kogarah rapid bus link, improved bus services north/south through Parramatta, Western Sydney Fuel Pipeline, More Trains, More Services program, WSI-Badgerys Creek Aerotropolis-Parramatta rail link. • Continue to consult with TfNSW regarding other Council-led transport initiatives.
Liveability	
<p>2. Local Housing Strategy - Housing Market Demand and Diversity Analysis</p> <p><i>Planning Priority C5, Action 16 requires Council to prepare a Local Housing Strategy.</i></p> <p><i>Planning Priority C5, Action 17 requires Councils to prepare Affordable Rental Housing Target Schemes following 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 Guideline², 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/delivering-future-transport-2056#greater-sydney>

² 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 NSW Government’s Guideline for Developing an Affordable Housing Contribution Scheme³.
<p>3. Local Housing Strategy – 6-10 Year Housing Target</p> <p><i>Planning Priority C5, 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 forecast for housing growth is 7,190 additional dwellings for the period 2021/22 to 2025/26 ⁴ DPIE monitoring⁵ shows the current pipeline for the period 2019/20 to 2023/24 is 12,650 dwellings. In this context, Council is to show how it can meet an indicative draft range for 6-10 year housing targets for the period 2021/22 to 2025/26 of 10,000 – 12,500 dwellings as part of its Local Housing Strategy. Testing this indicative range is to include a preliminary assessment of any relevant State government investment decisions in consultation with State agencies. Where relevant data is available, councils are to identify the contribution of non-standard dwellings⁶ (seniors housing, boarding houses and secondary dwellings) in relation to this indicative range.

³ Source: <https://www.planning.nsw.gov.au/Policy-and-Legislation/Housing/Diverse-and-affordable-housing/-/media/C6F1D0F0359C4AB7A28C90BE7DEEE636.ashx>

⁴ Source: Cumberland 2030: Our Local Strategic Planning Statement February 2020, p15

⁵ Source: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Forecast-data>

⁶ Standard dwellings relate to those monitored via DPIE’s housing monitor (ie. Sydney Water connections) and Non-standard dwellings are those delivered under housing SEPPs such as seniors housing, boarding houses and 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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	<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 projections⁷ are subject to review over time and will be managed through updates to the Region and district plans.
<p>4. Heritage</p> <p><i>Planning Priority C6, Action 19 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 Aboriginal, cultural and natural heritage in implementing the LSPS and developing LSPS updates.
<p>5. Place-based planning for local centres</p> <p><i>Planning Priority C6, Action 20 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 DPIE on more detailed strategic planning for Auburn, Granville, Lidcombe, Westmead south and Wentworthville local centres which should provide indicative locations for future housing. Place-based planning should have regard to findings of the Local Housing Strategy and Employment and Innovation Lands Strategy.
<p>Productivity</p>	
<p>6. Industrial and Employment Lands Strategy</p> <p><i>Planning Priority C1, Action 49 requires Cumberland Council to review and manage industrial and urban service land.</i></p>	<ul style="list-style-type: none"> Note: The Central City District Plan identifies industrial and urban services land in Cumberland as Review and Manage. In updating LEPs, councils are to conduct a strategic review of industrial lands. Confirm with DPIE if Council's Employment and Innovation Lands Strategy requires approval to inform LEP updates.
<p>7. Strategic Centres</p> <p><i>Planning Priority C10 requires Cumberland Council prioritise strategic land use and infrastructure plans for growing centres (Action 39), provide access to jobs, goods and services in centres (Action 37) and create new centres in accordance with the Principles for Greater Sydney's Centres (Action 38).</i></p>	<ul style="list-style-type: none"> Council's focus on promoting Merrylands as a Strategic Centre requires a robust evidence base to inform future region and district strategic plan updates.

⁷ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Cumberland.pdf>



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Sustainability	
<p>8. Greater Sydney Green Grid</p> <p><i>Planning Priority C16, Action 69 requires Councils to progressively refine the detailed design and delivery of Greater Sydney Green Grid priority corridors and projects important to the District.</i></p>	<ul style="list-style-type: none"> • Collaborate with the Greater Sydney Commission and other relevant State agencies and statutory authorities to deliver Green Grid connections and corridors. In particular work with Canterbury Bankstown on an integrated approach to revive and rehabilitate the Duck River. • In finalising Council’s Duck River Masterplan, confirm with DPIE if the Master Plan requires approval to inform LEP updates and/or other Green Grid priorities.
<p>9. Resilience to natural and urban hazards</p> <p><i>Planning Priority C20 requires Council to respond to the impacts of climate change (Action 81 and limit the intensification of development in areas most exposed to hazards (Action 82)</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 strategies, plans and programs, particularly the: <ul style="list-style-type: none"> ○ Community Facilities Strategy; ○ Open Space and Recreation Strategy; ○ Biodiversity Strategy; ○ future transport planning; and ○ other place-based plans.
<p>10. Open Space Strategy</p> <p><i>Planning Priority C17, Action 71 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 ‘<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 2019 requires approval to inform LEP updates. • As part of ongoing implementation and review of Council’s Open Space Strategy, have regard to open space as set out in the Central District Plan.
Implementation	



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<p>11. Planning Framework</p>	<ul style="list-style-type: none"> 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</p> <p><i>Planning Priority C21 requires Council to preparing local strategic planning statements informed by local strategic planning</i></p>	<ul style="list-style-type: none"> Note: The LSPS includes a commitment to commence a review of the LSPS in two years to align with the new Cumberland LEP. 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>13. Monitoring and Review</p> <p><i>Planning Priority C21, Action 1 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</p> <p><i>Planning Priority C22 Action 2 requires the development of performance indicators in consultation with state agencies and councils that ensure 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 use the performance indicators in the recently released Pulse of Greater Sydney which includes data available at Region, District and LGA level⁸.

⁸ Source: <https://www.greater.sydney/pulse-of-greater-sydney>