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Letter of Support: Waverley Council draft Local Strategic Planning Statement

Thank you for submitting Waverley Council'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 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 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 Waverley 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. The Commission understands that work is still in progress (including the Local Housing Strategy, Village Centres Strategy 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 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 the Local Housing Strategy for Waverley 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 Waverley 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

12 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 Waverley Council 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 transport initiatives in Future Transport 2056¹ including: <ul style="list-style-type: none"> ○ 0-10 year committed initiatives in progress: More Trains More Services – T4 Line²
<p>2. Council-led transport initiatives</p>	<ul style="list-style-type: none"> • Note: The LSPS has included Council-led transport infrastructure initiatives and will require ongoing consultation and collaboration with State agencies. These include: <ul style="list-style-type: none"> ○ Encouraging increased travel via ferry and improving connections along Curlewis Street and O'Sullivan Road to reduce load on buses between Bondi Beach and Bondi Junction; ○ Improving connections to Randwick Health & Education Precinct; and ○ Improving connections from Bondi Beach to Bondi Junction and onward to the CBD.
<p>3. 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 potential shared use agreements for school grounds and facilities to provide additional open space and community spaces.

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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Liveability	
<p>4. Local contributions</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"> Consult with the Department of Planning, Industry and Environment (DPIE) regarding local contribution rates and the essential works list.
<p>5. Local Housing Strategy</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>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 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. It is further noted that council will investigate the capacity of Waverley's Local Centres and Neighbourhood Centres to accommodate housing. Note: The Local Housing Strategy should be informed by the NSW Government's Guideline for Developing an Affordable Housing Contribution Scheme.⁴
<p>6. Local Housing Strategy</p> <p><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 0-5 year target for the period 2016-2021 is 1,250 dwellings⁵. Council's housing analysis indicates a draft housing target of 3,461 to 2036, with forecast

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: Eastern City District Plan (2018), p42.



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	<p>potential delivery of between 734 and 1,325 dwellings in the period 2021-2026⁶.</p> <ul style="list-style-type: none"> ○ DPIE monitoring⁷ shows the current pipeline for the period 2019/20 to 2023/24 is 1,300 dwellings. ● In this context, Council is to show how they can meet an indicative draft range for a 6-10 year housing target of 1,250–1,350 dwellings as part of their Local Housing Strategy. ● Testing 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 dwellings⁸ (seniors housing, boarding houses and secondary dwellings) in relation to this indicative range. ● 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 plans⁹.
<p>7. Local character</p> <p><i>Planning Priority E6, Action 18 requires recognising and celebrating the character of a place and its</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 the Government Architect NSW’s

⁶ Source: Waverley Council Local Housing Discussion Paper (2019), p38.

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: <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-Waverley.pdf>



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<p><i>people throughout planning, design, development and management to deliver great places.</i></p>	<p>Better Placed: An integrated design policy for the built environment of NSW South Wales (2017).</p> <ul style="list-style-type: none"> • Consult with DPIE on the approach to implementing local character including the application to exclude or vary state-wide policy¹⁰.
<p>8. 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"> • Consult with DPIE on place-based planning for local centres. • Place-based planning should have regard to findings of the Local Housing Strategy and Village Centres Strategy.
<p>9. 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 Aboriginal, cultural and natural heritage in implementing the LSPS and developing LSPS updates.
<p>Productivity</p>	
<p>10. Strategic centres</p> <p><i>Planning Priority E11, Action 46 requires council to strengthen Bondi Junction.</i></p>	<ul style="list-style-type: none"> • Confirm with DPIE if Council's Bondi Junction Commercial Centre Review requires approval to inform LEP updates. • Confirm with DPIE if Council's intention to investigate potential mechanisms to '<i>ensure that urban services are catered for in Waverley</i>' requires coordination with the Village Centres Strategy and Local Housing Strategy.
<p>Sustainability</p>	
<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"> • 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>'.

¹⁰ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Discussion-papers/Local-character-discussion-Paper-2019-02-26.pdf>



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	<ul style="list-style-type: none"> • Confirm with DPIE if Council’s proposed Open Space and Recreation Strategy 2020 requires approval to inform LEP updates.
<p>12. BASIX</p> <p><i>Planning Priority E19, requires councils 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.
<p>13. Resilience to natural and urban hazards</p> <p><i>Planning Priority E20, Action 74 requires Council to support initiatives that respond to the impacts of climate change and limit the intensification of development in existing urban areas most exposed to hazards (Action 75).</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"> ○ Open Space and Recreation Plan; ○ Coastal Management Program; ○ Social Sustainability Strategy; ○ Climate Change Adaption and Resilience Strategy; ○ Flood Study; and ○ any other place-based plans. • 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.
<p>Implementation</p>	
<p>14. Planning framework</p> <p><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>15. Updates to LSPS</p> <p><i>Planning Priority E21, Action 77(c) 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



Eastern City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
	projected population growth or changes to the relevant higher order strategic plan.
<p>16. Monitoring and review - Implementation</p> <p><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>17. Monitoring and review - Performance indicators</p> <p><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"> Note. Council has acknowledged the performance indicators in the recently released <i>Pulse of Greater Sydney</i>¹¹ and are encouraged to apply indicators at the LGA Level.

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