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Letter of Support: Willoughby Council draft Local Strategic Planning Statement

Thank you for submitting the Willoughby 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 North 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 Willoughby Council's draft Local Strategic Planning Statement (March 2020) as being consistent with the Greater Sydney Region Plan and Northern 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 Northern 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 the Local Housing Strategy for Willoughby 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 studies 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 Willoughby 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 the making of your LSPS, please contact Amanda Harvey, 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

Deborah Dearing
North District Commissioner
Assurance Panel Member

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 Willoughby Council draft Local Strategic Planning Statement:

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

North 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 N1, 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 South West (connecting to Chatswood Station) and Western Harbour Tunnel and Beaches Link. ○ 0-10 years for initiatives for investigation: improved bus services between Northern Beaches and Chatswood. ○ 20 year plus initiatives for investigation: address long term capacity constraints on the Pacific Highway.
<p>2. Council-led transport initiatives</p> <p><i>Planning Priority N1 seeks to plan for a city supported by infrastructure</i></p>	<ul style="list-style-type: none"> • Note: The LSPS includes Council-led transport infrastructure initiatives. These initiatives will require further investigation to determine alignment with TfNSW's strategic planning priorities. These include: <ul style="list-style-type: none"> ○ an upgrade of the Chatswood Bus Interchange; and ○ improved bus services between Chatswood and Dee Why.
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

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 N5, Action 17 requires councils to prepare Local Housing Strategies.</i></p> <p><i>Planning Priority N5, Action 18 requires councils to prepare Affordable Rental Housing Target Schemes following the development of implementation arrangements.</i></p>	<p>be approved by the Department of Planning, Industry and Environment (DPIE).</p> <ul style="list-style-type: none"> 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. Willoughby Council has established an affordable rental housing scheme under its Local Environment Plan (LEP). The NSW Government's Guideline for Developing an Affordable Housing Contribution Scheme (2019)⁴ recognises the need for Schemes to be regularly reviewed. It is noted Council intends to undertake the next review by 2021.
<p>4. Local Housing Strategy – 6-10 Year Housing Target</p> <p><i>Planning Priority N5, Action 17(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"> 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 LEPs and housing strategies. The Commission notes: <ul style="list-style-type: none"> Council's housing analysis indicates a 6-10 year target (2021 - 2026) of 1,400 to 1,600 dwellings⁵. DPIE monitoring⁶ shows the current housing supply forecast for the period 2019/20 to 2023/24 is 850 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 1,600 to 1,800 dwellings as part of its Local Housing Strategy and relevant LEP updates. Testing of this indicative range is to include a preliminary assessment of any relevant NSW

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: Willoughby draft Local Strategic Planning Statement, page 41.

⁶ Source: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Forecast-data>



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	<p>Government investment decisions in consultation with State agencies.</p> <ul style="list-style-type: none"> Where relevant data is available, councils are to identify the contribution of non-standard dwellings⁷ (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 plans⁸.
<p>5. Local character</p> <p><i>Planning Priority N6, Action 19(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'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). Consult with DPIE on the approach to implementing local character.
<p>6. Place based planning for local centres</p> <p><i>Planning Priority N6, Action 19 requires a place-based and collaborative approach throughout planning, design, development and management to deliver great places.</i></p> <p><i>Planning Priority N6, Action 22 requires place-based planning to support the role of centres as a focus for connected neighbourhoods.</i></p>	<ul style="list-style-type: none"> Continue to consult with DPIE on Council's draft Local Centres Strategy and ensure a coordinated approach to centres in the Local Housing Strategy.
<p>7. Heritage</p>	<ul style="list-style-type: none"> Continue to work with DPIE and Heritage NSW to ensure a strategic approach is taken to environmental

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://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Willoughby-City.pdf>



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<p><i>Planning Priority N6, Action 21 requires councils to identify, conserve and enhance environmental heritage.</i></p>	<p>heritage including Aboriginal cultural heritage in implementing the LSPS and developing LSPS updates.</p>
<p>Productivity</p>	
<p>8. Chatswood CBD</p> <p><i>Planning Priority N10, Action 42 requires council to strengthen Chatswood Strategic Centre.</i></p>	<ul style="list-style-type: none"> Continue to work with DPIE to finalise Council's strategy for the Chatswood CBD to facilitate the continued growth of the centre as a major employment hub.
<p>9. St Leonards Strategic Centre and Health and Education Precinct</p> <p><i>Planning Priority N9, Action 31 requires councils, other planning authorities and State agencies to deliver and implement a Place Strategy and Infrastructure Plan for the St Leonards health and education precinct.</i></p>	<ul style="list-style-type: none"> Work with DPIE, Lane Cove and North Sydney Councils to finalise and implement the St Leonards and Crows Nest 2036 Plan.
<p>10. Industrial and employment lands</p> <p><i>Planning Priority N11, Action 46 requires councils to retain and manage industrial and urban services land, in line with principles for managing industrial and urban services land in the North District Plan.</i></p>	<ul style="list-style-type: none"> Note: The North District Plan identifies industrial and urban services land in Willoughby as <i>Retain and manage</i>. Consider available findings of strategic planning investigations for St Leonards when preparing Council's Industrial Lands Strategy. Confirm with DPIE if Council's Industrial Lands Strategy requires approval to inform LEP updates.
<p>11. Freight</p> <p><i>Planning Priority N14, Action 60 requires councils, other planning authorities, State agencies and 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 plans to optimise freight handling and logistics network in relation to industrial lands.
<p>12. Leveraging infrastructure investment</p> <p><i>Planning Priority N12, Action 53 requires councils to plan for urban development, new centres, better places and employment uses that are integrated with, and optimise opportunities of, the public values and use of Sydney Metro City &</i></p>	<ul style="list-style-type: none"> Work with TfNSW to leverage opportunities provided by Sydney Metro as part of Council's Integrated Transport Strategy.



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<i>Southwest, as well as other city-shaping projects.</i>	
Sustainability	
13. Green Grid <i>Planning Priority N19, Action 72 requires councils to progressively refine detailed design and delivery of Greater Sydney Green Grid.</i>	<ul style="list-style-type: none"> Collaborate with State agencies and neighbouring councils to design and deliver the Green Grid opportunities.
14. Open space strategy <i>Planning Priority N20, Action 73 requires councils to maximise the use of existing open space and protect, enhance and expand open space.</i>	<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 a future review of Council's Open Space and Recreation Plan and Strategy requires approval to inform LEP updates.
15. Precinct based energy generation <i>Planning Priority N21, Action 75 requires councils to support precinct-based initiatives to increase renewable energy generation, and energy and water efficiency, especially in Planned Precincts.</i>	<ul style="list-style-type: none"> Support opportunities for precinct-based energy and water initiatives in the St Leonards and Crows Nest Planned Precinct.
16. BASIX <i>Planning Priority N21 requires Council to reduce carbon emissions and manage energy, water and waste efficiently.</i>	<ul style="list-style-type: none"> Consult with DPIE regarding changes sought to BASIX standards.
17. Flooding and bushfire <i>Planning Priority S22, Action 80 requires councils to support initiatives that respond to the impacts of climate change.</i>	<ul style="list-style-type: none"> Continue to work with State agencies to manage flood and fire risk.
18. Resilience to natural and urban hazards <i>Planning Priority N22, Actions 80 and 81 require councils to support initiatives that respond to the impacts of climate change and to limit the intensification of</i>	<ul style="list-style-type: none"> Collaborate with the relevant State agencies and neighbouring councils to strengthen approaches to resilience as part of development and implementation of Council's Resilience Plan for Willoughby and other place-based planning projects.



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<i>development in existing urban areas most exposed to hazards.</i>	
Implementation	
19. Planning framework <i>Section 6 Implementation, Figure 26.</i>	<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.
20. Updates to LSPS <i>Planning Priority N23 requires councils to prepare local strategic planning statements informed by local strategic planning.</i>	<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.
21. Monitoring and review - Implementation <i>Planning Priority N23, Action 83 LEP Review and Section 3.8 (4a) EP&A Act LEP Updates.</i>	<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.
22. Monitoring and review - Performance indicators <i>Planning Priority N23, Action 84 requires the development of performance indicators in consultation with State agencies and councils that measure the 10 Directions to inform inter-agency, NSW Government and local government decision-making.</i>	<ul style="list-style-type: none"> Council is encouraged to apply the performance indicators in the <i>Pulse of Greater Sydney</i> which are available at the LGA level⁹.

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