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Letter of Support: Woollahra Council draft Local Strategic Planning Statement

Thank you for submitting Woollahra 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 Woollahra 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. It also reflects that work is still in progress (including the Local Housing Strategy Community Facilities Study, Recreational Needs Study and Edgecliff Commercial Centre Planning and Urban Design 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 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 Woollahra;
- 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 Woollahra 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, A/Executive Director, Eastern Harbour City, Place, Design and Public Spaces, Department of Planning, Industry and Environment on (02) 8275 1120 or Amanda.Harvey@planning.nsw.gov.au.

Yours sincerely,

Deborah Dearing
Eastern City District Commissioner
Commission Delegate

Geoff Roberts AM
Deputy Chief Commissioner
Chair of Assurance Panel

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 the Woollahra Council draft LSPS:

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	
1. State-led transport investigations and projects <i>Planning Priority E1, Action 3 seeks to align forecast growth with infrastructure.</i>	<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 progress²: More Trains, More Services program - T4, Ferry Fleet Replacement Program.
2. Council-led transport initiatives <i>Planning Priority E1.</i>	<ul style="list-style-type: none"> 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"> increased public transport services; Edgecliff Interchange upgrades; and proposed off-road links in cycleway network.
Liveability	
3. Local Housing Strategy - Housing analysis <i>Planning Priority E5, Action 16 requires councils to prepare Local Housing Strategies.</i>	<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 Guidelines³, the strategy is to include an analysis of changing

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>

³ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/Local-Housing-Strategy-Guideline-and-Template.pdf>



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<p><i>Action 17 requires councils to prepare Affordable Rental Housing Target Schemes following development of implementation arrangements.</i></p>	<p>demographics, housing density and housing market demand to confirm take-up rates and proposed staged approach.</p> <ul style="list-style-type: none"> Note: The Local Housing Strategy should be informed by the NSW Government's Guidelines for Developing an Affordable Housing Contribution Scheme⁴.
<p>4. Local Housing Strategy - 6-10 year housing target</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 housing target for the period 2016-2021 is 300 additional dwellings⁵. Council's LSPS commits to preparing a Local Housing Strategy⁶. DPIE monitoring⁷ shows the current pipeline 2019/20 to 2023/24 of 550 dwellings. In this context, Council is to show how they can meet an indicative draft range for 6-10 year housing targets for 2021/22 to 2025/26 of 500 - 600 dwellings as part of its 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.

⁴ Source: <https://www.planning.nsw.gov.au/Policy-and-Legislation/Housing/Diverse-and-affordable-housing/-/media/C6F1D0F0359C4AB7A28C90BE7DEEE636.ashx>

⁵ Eastern City District Plan (2018) p.42

⁶ Source: Woollahra Local Strategic Planning Statement, March 2020, p36

⁷ Source: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Forecast-data>



Eastern City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
	<ul style="list-style-type: none"> 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 the Region and district plans⁹.
<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 Local Character and Place Guideline (2019) and Government Architect NSW's Better Placed: An integrated design policy for the built environment of NSW (2017). Consult with DPIE on the approach to implementing local character including the application to exclude or vary state-wide policy¹⁰.
<p>6. Place-based planning for local centres</p> <p><i>Planning Priority E6, Action 18 requires a place-based and collaborative approach throughout planning, design, development and management, deliver great places.</i></p> <p><i>Action 21 requires place-based planning to support the role of</i></p>	<ul style="list-style-type: none"> Consult with DPIE on place-based planning for local centres, including: <ul style="list-style-type: none"> Double Bay; Oxford Street & Paddington; Edgecliff; and other place plans for centres not identified within the LSPS.

⁸ Source: 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-fags/Research-and-demography/Population-projections/2019-Woollahra-Municipal.pdf>

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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<i>centres as a focus for connected neighbourhoods.</i>	<ul style="list-style-type: none"> Place-based planning should have regard to findings of the Local Housing Strategy.
<p>7. 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. Continue to work with DPIE to investigate preparing a local exclusion for heritage conservation areas from complying development under State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 to prevent alterations and additions that remove internal heritage fabric.
Sustainability	
<p>8. Recreation needs study</p> <p><i>Planning Priority E18, Action 67 requires councils to maximise the use of existing open space and protect, enhance and expand public open space by investigating opportunities to provide new 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 Recreation Needs Strategy requires approval to inform LEP updates.
<p>9. 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>10. Resilience to natural and urban hazards and climate change</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</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"> Integrated Transport Strategy; Community Facilities Study; Recreational Needs Study; and



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<p><i>most exposed to hazards (Action 75).</i></p> <p><i>Action 76 requires councils to mitigate the urban heat island effect and reduce vulnerability to extreme heat.</i></p>	<ul style="list-style-type: none"> ○ 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.
Implementation	
<p>11. 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>12. Updates to LSPS</p> <p><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 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 <i>- Implementation</i></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>14. Monitoring and Review <i>- Performance indicators</i></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"> • Council is encouraged to utilise the performance indicators in the recently released <i>Pulse of Greater Sydney</i>¹¹ which includes data available at Region, district and LGA levels.

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