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Letter of Support: Blacktown Council Draft Local Strategic Planning Statement

Thank you for submitting the Blacktown 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 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 Blacktown 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 Local Housing Strategy, Employment Lands Strategy, Open Space Strategy) that will inform and strengthen future updates to your 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 Blacktown;
- 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
- 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 Blacktown 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 the Blacktown draft LSPS:

These Advisory Notes highlight key considerations to support Council in the implementation of the first 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 planning for city-shaping and city serving transport initiatives in Future Transport 2056¹ including: <ul style="list-style-type: none"> ○ 0-10 years investigation in progress: North-south rail link in Western Parkland City: Cudgegong Rd - St Marys, Bells Line of Road Castlereagh Connection. ○ 10-20 years initiatives for investigation: Outer Sydney Orbital; Western Sydney Freight Line. ○ 20+ years visionary initiative: Parramatta to Norwest mass transit/train link.
Liveability	
<p>2. Local Housing Strategy -</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 (LEPs) and housing strategies. The Commission notes: <ul style="list-style-type: none"> Council’s 0-5 year housing target for the period 2016/17 to 2020/21 is 13,950 dwellings. Council’s housing analysis indicates a 6-10 year target will be developed through the Local Housing Strategy. DPIE monitoring⁴ shows the current pipeline 2019/2020 to 2023/24 of 18,700 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 16,500 – 18,500 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 dwellings⁵

³ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/guideline-sepp70-developing-affordable-housing-contribution-scheme-2019-02-28.pdf>

⁴ Source: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Forecast-data>

⁵ 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, boarding houses and affordable rental (granny flats). For more information refer to: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Other-forms-of-housing>



Central City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
	<p>(seniors housing, boarding houses and secondary dwellings) in relation to this indicative range.</p> <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 projections⁶ 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. Local Contributions</p> <p><i>Planning Priority C3, Action 8 requires Council 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 DPIE regarding local contribution rates and the essential works list.
<p>6. Place-based planning for local centres</p> <p><i>Planning Priority C6, Action 20 requires Councils to use 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 Seven Hills, Rooty Hill, Doonside, Riverstone, Toongabbie and Quakers Hill and Schofields town centre, which have been nominated as locations for future housing. Place-based planning should have regard to findings of the Local Housing Strategy and the updated Commercial Centres Strategy.
<p>Productivity</p>	
<p>7. Industrial and Employment Lands Strategy</p> <p><i>Planning Priority C11, Action 49 requires Blacktown Council to review and manage industrial and urban service land by undertaking a review of all industrial lands to confirm their</i></p>	<ul style="list-style-type: none"> Note: The Central City District Plan identifies industrial and urban services land in Blacktown as ‘Review and Manage’ and ‘Retain and Manage’ (within the North West Growth Area). Confirm with DPIE if any future employment lands strategy requires approval to inform LEP updates.

⁶ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Blacktown.pdf>



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<i>retention or transition to higher order uses and prepare appropriate controls.</i>	(Note: a specific strategy is not identified in the draft LSPS).
<p>8. Strategic Centres</p> <p><i>Planning Priority C10 requires The Blacktown Council to strengthen the roles of Blacktown, Marsden Park and Mount Druitt Strategic Centres (Actions 40, 43 and 44), 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"> • Confirm with DPIE if any future update to Council's Commercial Centres Strategy and place-based planning for strategic centres, requires approval to inform LEP updates.
Sustainability	
<p>9. Green Grid connections</p> <p><i>Planning Priority C16, Action 69(a) 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"> • Consider opportunities to plan and deliver Green Grid connections, consistent with the Central City District Plan, in relevant strategies and place-based planning, including: <ul style="list-style-type: none"> ○ Recreation and Open Space Strategy; ○ Biodiversity Strategy; ○ place-based plans for strategic centres and Urban Renewal Precincts.
<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 '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 and Open Space Strategy requires approval to inform LEP updates. • As part of the ongoing implementation and review of Council's Open Space Strategy, have regard to access to open space as set out in the Central City District Plan.



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<p>11. BASIX</p> <p><i>Planning Priority C19 requires Council to reduce carbon emissions and manage energy, water and waste efficiently.</i></p>	<ul style="list-style-type: none"> Consult with DPIE regarding changes sought to BASIX standards
<p>12. Flooding and bushfire</p> <p><i>Planning Priority C20 requires Council to adapt to the impacts of urban and natural hazards and climate change.</i></p>	<ul style="list-style-type: none"> Continue to consult with DPIE and State agencies to manage flood and fire risk, including the: <ul style="list-style-type: none"> Council's floodplain risk management plan; managing flood risk in the Hawkesbury-Nepean Valley and guidance on land use limitations to reflect the flood risk.
<p>13. 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 existing urban areas most exposed to hazards (Action 82)</i></p>	<ul style="list-style-type: none"> Collaborate with relevant state agencies and neighbouring councils to strengthen approaches to resilience, particularly the: <ul style="list-style-type: none"> Recreation and Open Space Strategy Biodiversity Strategy local infrastructure planning; future transport planning; and other place-based plans for strategic centres and Urban Renewal Precincts.
<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 C21, 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 review the LSPS every seven years, or earlier if warranted. 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



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	<p>in projected population growth or changes to the relevant higher order strategic plan.</p>
<p>16. Monitoring and Review – Implementation <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>17. Monitoring and Review – Performance Indicators <i>Planning Priority C22 Action 87 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 <i>The Pulse of Greater Sydney</i>, which are available at Region, district and LGA levels⁷.

⁷ Source: <https://www.greater.sydney/pulse-of-greater-sydney>