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Letter of Support: Blue Mountains City Council draft Local Strategic Planning Statement

Thank you for submitting Blue Mountains City 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 Western 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 Blue Mountains City Council's draft Local Strategic Planning Statement (March 2020) as being consistent with the Greater Sydney Region Plan and Western 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, Priority Infrastructure Plan and updated Planning Study for Employment Lands) 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 Western 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 the Local Housing Strategy for Blue Mountains City 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. We particularly recognise Council's effort in the context of the recent bushfires which have had a devastating impact on local communities and have required Council to focus on recovery. Please pass on our thanks to all the members of your team who have assisted in achieving this significant milestone for Blue Mountains City 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 Catherine Van Laeren, A/Executive Director, Central River City and Western Parkland City, Place, Design and Public Spaces, Department of Planning, Industry and Environment on (02) 9860 1520 or Catherine.VanLaeren@planning.nsw.gov.au.

Yours sincerely,

Geoff Roberts AM
Deputy Chief Commissioner
Chair of Assurance Panel

Elizabeth Dibbs
Western City District Commissioner
Assurance Panel Member
Commission Delegate

18 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 Blue Mountains City Council draft Local Strategic Planning Statement:

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

Western City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
<p>Infrastructure and Collaboration</p>	
<p>1. State-led transport investigations and projects</p> <p><i>Planning Priority W1, Action 3 seeks to align forecast growth with infrastructure.</i></p>	<ul style="list-style-type: none"> • Continue to consult with Transport for NSW (TfNSW) on planning for city-shaping & city-serving transport initiatives in Future Transport 2056¹ including: <ul style="list-style-type: none"> ○ 0-10 year committed initiatives in progress²: Upgrade to Blue Mountains Line, Bells Line of Road Corridor Upgrade; and ○ 20+ years investigation initiatives: Bells Lines of Road – Castlereagh Connection.
<p>2. Council-led transport initiatives</p> <p><i>Planning Priority W1, seeks to plan for a city supported by infrastructure.</i></p>	<ul style="list-style-type: none"> • Note: The draft SPS 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"> ○ Bus layovers, transport hubs, satellite parking including train stations; ○ Advocating alternatives for regional road freight and design solutions to mitigate impacts and leverage benefits of Great Western Highway upgrades; ○ Improving access to Katoomba Town Centre;

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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	<ul style="list-style-type: none"> ○ Improving traffic movement and safety at the intersection of Hawkesbury Road and the Great Western Highway at Springwood; and ○ Seeking additional and improved train services.
<p>3. Shared use agreements</p> <p><i>Planning Priority W3, Action 10 seeks to optimise the use of available public land for social infrastructure.</i></p>	<ul style="list-style-type: none"> ● Continue to work with the Department of Education and Office of Sport regarding potential shared/joint use of facilities.
<p>Liveability</p>	
<p>4. Local Housing Strategy – Housing analysis</p> <p><i>Planning Priority W5, Action 17 requires councils to prepare Local Housing Strategies.</i></p> <p><i>Planning Priority W5, Action 18 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 Guideline³ 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 Guideline⁴, 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. ● Note: The Local Housing Strategy should be informed by the NSW Government’s Guideline for Developing an Affordable Housing Contribution Scheme⁵. ● Continue to work with other councils in the Western Sydney Planning Partnership to assess options and the viability of affordable rental housing as part of the development of an Affordable Housing Strategy and Affordable Housing Contribution Scheme.
<p>5. Local Housing Strategy – 6-10 year housing target</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

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/Local-Housing-Strategy-Guideline-and-Template.pdf>

⁵ Source: <https://www.planning.nsw.gov.au/Policy-and-Legislation/Housing/Diverse-and-affordable-housing/-/media/C6F1D0F0359C4AB7A28C90BE7DEEE636.ashx>



Western City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
<p><i>Planning Priority W5, Action 17(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>	<p>the development of updated local environmental plans (LEPs) and housing strategies.</p> <ul style="list-style-type: none"> • The Commission notes: <ul style="list-style-type: none"> ○ Council's housing analysis indicates a 6-10 year target for the period 2021-2026 of 550 dwellings⁶. ○ DPIE monitoring⁷ shows the current pipeline for the period 2019/20 to 2023/24 is 550 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 550 to 600 dwellings as part of its Local Housing Strategy and relevant LEP updates. • 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 projections⁹ are subject to review over time and will

⁶ Source: Blue Mountains City Council draft Local Strategic Planning Statement March 2020, p80

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

⁸ Source: Standard dwellings relate to those monitored via DPIE's housing monitor (i.e. 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>

⁹ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Blue-Mountains.pdf>



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	be managed through updates to the Region and district plans.
<p>6. Local Character</p> <p><i>Planning Priority W6, Action 19 requires recognition and celebration of the character of a place and its people throughout planning, design, development and management of the delivery of 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>7. Heritage</p> <p><i>Planning Priority W6, Action 21 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 environmental heritage including Aboriginal cultural heritage in implementing the LSPS and developing LSPS updates.
<p>8. Local contributions</p> <p><i>Planning Priority W3, Action 9 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 DPIE regarding local contribution rates and the essential works list.
<p>9. Place-based planning for local centres</p> <p><i>Planning Priority W6, Action 19 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, including key town centres which should provide indicative locations for future housing. Place-based planning should have regard to findings of the Local Housing Strategy.
Productivity	
<p>10. Freight transport</p> <p><i>Planning Priority W7, Action 29 requires councils to optimise the efficiency and effectiveness of the freight handling network.</i></p>	<ul style="list-style-type: none"> Consult with TfNSW on approaches to managing freight movements, including local urban freight movements.
<p>11. Strategic centres</p> <p><i>Planning Priority W11, Action 56 requires councils to provide access to jobs, goods and services in centres; Action 58</i></p>	<ul style="list-style-type: none"> Confirm with DPIE if Council's Katoomba Employment Study (2019) requires approval to inform LEP updates.



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<p><i>requires councils to prioritise strategic land use and infrastructure plans for growing centres. Action 62 requires Blue Mountains Council to strengthen Katoomba strategic centre.</i></p>	<ul style="list-style-type: none"> • Confirm with DPIE if Council's Katoomba Master Plan requires approval to inform LEP updates.
<p>Sustainability</p>	
<p>12. Rural lands strategy</p> <p><i>Planning Priority W17 requires councils to maintain or enhance the values of the Metropolitan Rural Area using place-based planning to deliver targeted environmental, social and economic outcomes (Action 78) and limit urban development to within the Urban Area (Action 79).</i></p>	<ul style="list-style-type: none"> • Collaborate with adjoining Councils to consider supporting the growth of the agribusiness sector as part of any future place-based planning for rural areas within the Blue Mountains.
<p>13. Open space strategy</p> <p><i>Planning Priority W18, Action 80 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 Open Space and Recreation Strategy (2019) requires approval to inform LEP updates.
<p>14. BASIX</p> <p><i>Planning Priority W19 requires councils 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>15. Resilience to natural and urban hazards</p> <p><i>Planning Priority W20 requires councils to respond to the impacts of climate change (Action 87) and limit the intensification of development in areas most exposed to hazards (Action 88).</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 through the City Disaster Recovery Plan • Consider the impacts of flooding in the Hawkesbury-Nepean Valley on infrastructure and communities in



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	the Blue Mountains as part of the City Disaster Recovery Plan and other relevant work on resilience
<p>16. Flooding and bushfire</p> <p><i>Planning Priority W20 requires councils to adapt to the impacts of urban and natural hazards and climate change</i></p> <p><i>Planning Priority W20 Action 90 requires councils to respond to the direction for managing flood risk in the Hawkesbury-Nepean Valley as set out in Resilient Valley, Resilient Communities – Hawkesbury-Nepean Valley Flood Risk Management Strategy.</i></p>	<ul style="list-style-type: none"> Consult with DPIE and State agencies to prepare and manage flood and fire risk, including when managing flood risk in the Hawkesbury-Nepean Valley¹⁰ and preparing guidance on land use limitations to reflect flood risk.
Implementation	
<p>18. Planning framework</p> <p><i>Section 6 Implementation, Figure 30.</i></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>19. Updates to LSPS</p> <p><i>Planning Priority W21, Action 91 requires councils to prepare 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 2024, and then again every four years to align with the review period for Council’s community strategic plan¹¹. 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. Update the LSPS when key supporting studies including the Local Housing Strategy are completed, noting that the Local Housing Strategy should be approved by DPIE.

¹⁰ Source: Western City District Plan, p.167

¹¹ Source: Blue Mountains draft Local Strategic Planning Statement, p.133



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<p>20. Monitoring and review – Implementation <i>Planning Priority W21, Action 91 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>21. Monitoring and review – Performance indicators <i>Planning Priority W22, Action 92 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 apply the performance indicators in <i>The Pulse of Greater Sydney</i>, which are available at LGA level¹².

¹² Source: <https://www.greater.sydney/pulse-of-greater-sydney>