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Letter of Support: Northern Beaches Council draft Local Strategic Planning Statement

Thank you for submitting Northern Beaches 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 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 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 Northern Beaches Council's draft Local Strategic Planning Statement (March 2020 V5) as being consistent with the Greater Sydney Region Plan and North 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, Employment Study and Planning for Our Environment) 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 North 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 Northern Beaches 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 Northern Beaches 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 V5). 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, 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
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 Northern Beaches 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 NSW (TfNSW) on transport initiatives in Future Transport 2056¹ including: <ul style="list-style-type: none"> ○ 0-10 year committed initiatives in progress²: Northern Beaches Hospital road upgrade and Western Harbour Tunnel and Beaches Link; and ○ 0-10 years initiatives for investigation in progress: East-west public transport connection from Mona Vale to Macquarie Park and Improved bus services between Northern Beaches and Chatswood.
<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 related to preferred future investment in mass transit. These initiatives require further investigation to determine alignment with TfNSW's strategic planning priorities.
<p>3. Shared use agreements</p> <p><i>Planning Priority N3, Action 10 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 arrangements for new open space and recreation facilities in Frenchs Forest Strategic Centre.
Liveability	
<p>4. Local contributions</p> <p><i>Planning Priority N3, 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 the Department of Planning, Industry and Environment (DPIE) regarding local contribution rates and the essential works list.

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>5. Local Housing Strategy</p> <p><i>Housing analysis</i></p> <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>	<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. • 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 N5, 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>	<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 – 2020/21 is 3,400 dwellings. ○ Council’s housing analysis indicates that projected population growth is expected to generate demand for an additional 652 new dwellings per year.⁵ ○ DPIE monitoring⁶ shows the current pipeline for 2019/20 to 2023/24 is 1,950 dwellings. • In this context, Council is to show how they can meet an indicative draft range for a 6-10 year housing target for the period 2021/22 to 2025/26 of 3,500 - 4,000 dwellings as part of their Local Housing Strategy.

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: Northern Beaches draft Local Strategic Planning Statement, P119

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



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	<ul style="list-style-type: none"> • 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 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>7. Local character</p> <p><i>Planning Priority N6, Action 19(e) 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’s Local Character and Place Guideline (2019) and the 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 policy⁹.
<p>8. 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 of the delivery of great places.</i></p>	<ul style="list-style-type: none"> • Consult with DPIE on place-based structure plans for local centres, including: <ul style="list-style-type: none"> ○ Testing the extent of areas identified for mixed-use and providing guidance for transition areas; ○ Preparation of a potential Retail and Commercial Study with a focus on local centres; and

⁷ 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 senior housing, boarding houses and affordable rental housing (secondary dwellings).

⁸ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Northern-Beaches.pdf>
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/Discussion-papers/Local-character-discussion-Paper-2019-02-26.pdf>



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<p><i>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"> ○ Preparation of a potential Public Domain Strategy and Public Domain Plans. ● Place-based planning should have regard to findings of the Local Housing Strategy and Employment Study.
<p>9. Heritage</p> <p><i>Planning Priority N6, 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.
Productivity	
<p>10. Industrial and employment lands strategy</p> <p><i>Planning Priority N11, Action 46 requires Northern Beaches Council to retain and manage industrial and urban services land.</i></p>	<ul style="list-style-type: none"> ● Note: The North District Plan identifies industrial and urban services land in Northern Beaches as <i>Retain and Manage</i>. In updating LEPs, councils are to conduct a strategic review of industrial lands. ● Confirm with DPIE if Council's Employment Study requires approval to inform LEP updates.
Sustainability	
<p>11. Open space strategy</p> <p><i>Planning Priority N20, Action 73 requires councils to maximise the use of existing open space and protect, enhance and expand public 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>. ● Confirm with DPIE if Council's Study 'Planning for our Environment' requires approval to inform LEP updates. ● As part of place-based planning for centres, review the Sportsground Strategy (2017) having regard to access to open space as set out in the North District Plan.
<p>12. Rural Lands Strategy</p> <p><i>Planning Priority N18 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 69) and limit urban development to within the Urban Area (Action 70).</i></p>	<ul style="list-style-type: none"> ● Liaise with GSC and DPIE on the MRA boundary in future updates to the Greater Sydney Region Plan. ● Work with DPIE on Council's future environmental study known as the 'deferred lands' that would require approval to inform LEP updates.



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<p>13. Greater Sydney Green Grid</p> <p><i>Planning Priority N19, Action 72 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"> Collaborate with the Greater Sydney Commission and other relevant State agencies and statutory authorities to deliver Green Grid connections and corridors.
<p>14. BASIX</p> <p><i>Planning Priority N21 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 increasing BASIX standards in the Frenchs Forest Precinct Plan.
<p>15. Resilience to natural and urban hazards</p> <p><i>Planning Priority N22, Action 80 and 81 requires councils to support initiatives that respond to the impacts of climate change and to limit the intensification of development in existing urban areas most exposed to hazards.</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 as part of Council's involvement in NSW Government Sustainability Advantage program and through Council's work on: <ul style="list-style-type: none"> Implementing the Environment and Climate Change Strategy 2040 Protect. Create. Live; Environmental study for the 'deferred lands'; and other place-based plans.
<p>16. Flooding and bushfire</p> <p><i>Planning Priority N22 requires councils to adapt to the impacts of urban and natural hazards and climate change.</i></p>	<ul style="list-style-type: none"> Continue to work with State agencies to manage flood and fire risk.
Implementation	
<p>17. 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>18. Updates to LSPS</p> <p><i>Planning Priority N23 requires councils to prepare local strategic planning statements informed by local strategic planning.</i></p>	<ul style="list-style-type: none"> Note: has committed to update the LSPS as required and review its LSPS at least every seven years. The LSPS will consider findings from new studies, strategies or plans. As set out in the LSPS Guidelines, revisions to the LSPS may be required in response to significant changes in the



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	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>19. Monitoring and review - Implementation</p> <p><i>Planning Priority N23, Action 83 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>20. Monitoring and review – Performance indicators</p> <p><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, 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 levels.¹⁰

¹⁰Source: <https://www.greater.sydney/pulse-of-greater-sydney>