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## Letter of Support: City of Parramatta Council Draft Local Strategic Planning Statement

Thank you for submitting the Parramatta 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 City of Parramatta Council's draft Local Strategic Planning Statement (March 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. It also reflects that work is still in progress (including Local Housing Strategy, and Employment Lands Strategy and Review, and Open Space Strategy) 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 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 Parramatta 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 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 and Employment Land Strategy and Review are finalised. In particular, this may include the need to review and update the LSPS in 2021 to ensure alignment of infrastructure following the NSW Government's response to the Place-based Infrastructure Compact (PIC) pilot for the Greater Parramatta and the Olympic Peninsula (GPOP) so it can be progressed in a collaborative way with Council.

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 City of Parramatta 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, Department of



Planning, Industry and Environment on (02) 9860 1520 or  
[Catherine.VanLaeren@planning.nsw.gov.au](mailto: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**

**31 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 City of Parramatta Council's draft Local Strategic Planning Statement:

*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
<p><b>Infrastructure and Collaboration</b></p>	
<p><b>1. State-led transport investigations and projects</b></p> <p><i>Planning Priority C1, Action 3 seeks to align forecast growth with infrastructure.</i></p>	<ul style="list-style-type: none"> <li>• Continue to consult with Transport for NSW (TfNSW) on planning for city-shaping transport initiatives in Future Transport 2056<sup>1</sup> including:               <ul style="list-style-type: none"> <li>○ 0-10 year committed initiatives in progress<sup>2</sup>: Parramatta Light Rail Stage 1 and Stage 2, M4 Smart Motorway, Sydney Metro West, Priority cycleway links in the Central River City, Parramatta to Bankstown to Hurstville/Kogarah rapid bus link, Improved bus services between north of Parramatta and centres to the south of Parramatta, T-Way to T-Way link, Safe cycleway network within 10km of Parramatta;</li> <li>○ 0-10 year committed initiatives not commenced: Parramatta inner ring road (improvements to existing surface roads);</li> <li>○ 10-20 year initiatives for investigation: Parramatta to Epping mass transit / train link, Parramatta to Kogarah Mass transit / train link, Parramatta Light Rail Extensions, Parramatta Outer Ring Road; and</li> <li>○ 20+year visionary initiatives: Parramatta to Norwest Mass Transit / Train link, Central City Strategic Road.</li> </ul> </li> </ul>

<sup>1</sup> Source: : <https://future.transport.nsw.gov.au/plans/greater-sydney-services-and-infrastructure-plan/service-and-infrastructure-initiatives>

<sup>2</sup> Source: <https://future.transport.nsw.gov.au/delivering-future-transport-2056>



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	<ul style="list-style-type: none"> <li>Note: Confirm with Department of Planning, Industry and Environment (DPIE) if the joint traffic and transport study for the Parramatta Road Corridor Urban Transformation Strategy has any implications for the LSPS.</li> </ul>
<p><b>2. GOPP PIC</b></p> <p><i>Planning Priority C1 seeks to plan for a city supported by infrastructure.</i></p>	<ul style="list-style-type: none"> <li>Note: The PIC model was developed to better align growth with the timely delivery of infrastructure and services. The findings and proposed actions from its pilot application in GOPP were presented in <i>A City Supported by Infrastructure – Place-based Infrastructure Compact Pilot</i> on 7 November 2019<sup>3</sup>.</li> <li>Following the public feedback period over November and December 2019, the Commission is finalising its recommendations for consideration by the NSW Government as acknowledged in Council's LSPS.</li> <li>Note: The GOPP PIC delivers on Action 7 of the <i>Greater Sydney Region Plan – A Metropolis of Three Cities</i>.</li> </ul>
<p><b>3. Council-led transport initiatives</b></p> <p><i>Planning Priority C1 seeks to plan for a city supported by infrastructure.</i></p>	<ul style="list-style-type: none"> <li>Note: The LSPS has included Council-led transport infrastructure initiatives and will require ongoing consultation and collaboration with State agencies including: <ul style="list-style-type: none"> <li>Managing the provision of car parking in Strategic Centres located on city-shaping and city-serving transport corridors, prioritising short-stay and business-to-business uses.</li> <li>Advocating to the Commonwealth and State Government that any high speed rail to/from Melbourne to Canberra, to Sydney, to Brisbane explores the potential for a possible station in the Parramatta CBD given its central geographic location for Greater Sydney (Figures 1 and 21 of the draft LSPS).</li> </ul> </li> <li>Note: Confirm with DPIE if the joint traffic and transport study for the Parramatta Road Corridor</li> </ul>

<sup>3</sup> Source: [https://gsc-public-1.s3.amazonaws.com/s3fs-public/gpop\\_pic\\_-\\_a\\_city\\_supported\\_by\\_infrastructure\\_web.pdf](https://gsc-public-1.s3.amazonaws.com/s3fs-public/gpop_pic_-_a_city_supported_by_infrastructure_web.pdf)



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	Urban Transformation Strategy has any implications for the LSPS.
<p><b>4. Shared use agreements</b></p> <p><i>Planning Priority C3, Action 9 seeks to optimise the use of available public land for social infrastructure.</i></p>	<ul style="list-style-type: none"> <li>Work with the Department of Education on potential shared use arrangements for school grounds and facilities to provide additional space and community spaces.</li> </ul>
<p><b>5. Planning Agreements</b></p> <p><i>Planning Priority C3, Action 9 seeks to optimise the use of available public land for social infrastructure.</i></p>	<ul style="list-style-type: none"> <li>Note: DPIE's Draft Practice Note: Planning Agreements, particularly in relation to the principles and policy for planning agreements applies. <sup>4</sup></li> </ul>
<b>Liveability</b>	
<p><b>6. Local Housing Strategy - Housing analysis</b></p> <p><i>Planning Priority C5, Action 16(d) requires Local Housing Strategies to address the principles for housing strategies outlined in Objective 10 of A Metropolis of Three Cities.</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"> <li>Note: The NSW Government's Local Housing Strategy Guidelines require Council's Local Housing Strategy to be approved by the DPIE.</li> <li>Note: The Local Housing Strategy including Housing Market Demand and Diversity Analysis to confirm take-up rates and proposed staged approach to delivery of housing.</li> <li>As set out in the Local Housing Strategy Guideline<sup>5</sup>, 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.</li> <li>Note: The Local Housing Strategy should be informed by the NSW Government's Guideline for Developing an Affordable Housing Contribution Scheme<sup>6</sup>.</li> </ul>
<p><b>7. Local Housing Strategy – 6-10 year housing target</b></p>	<ul style="list-style-type: none"> <li>As set out in Action 4 of the Greater Sydney Region Plan, Council's 6-10 year housing target is to inform</li> </ul>

<sup>4</sup> Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Practice-notes/vpa-draft-practice-note-2016-11.ashx>

<sup>5</sup> Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/Local-Housing-Strategy-Guideline-and-Template.pdf>

<sup>6</sup> Source: <https://www.planning.nsw.gov.au/Policy-and-Legislation/Housing/Diverse-and-affordable-housing/-/media/C6F1D0F0359C4AB7A28C90BE7DEEE636.ashx>



Central City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
<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>	<p>the development of updated local environmental plans (LEPs) and housing strategies.</p> <ul style="list-style-type: none"> <li>• The Commission notes: <ul style="list-style-type: none"> <li>○ Council’s housing analysis indicates an estimated provision of 23,662 dwellings to be delivered in the 6-10 year (2022-2026)<sup>7</sup></li> <li>○ DPIE monitoring<sup>8</sup> shows the current housing supply forecast for the period 2019/20 to 2023/24 is 17,800 dwellings.</li> </ul> </li> <li>• In this context, Council is to show how it can meet an indicative draft 6-10 year housing target range for the period 2021/22 to 2025/26 of 22,500 – 25,000 dwellings as part of the Local Housing Strategy and relevant LEP updates.</li> <li>• Testing this indicative range is to include a preliminary assessment of any relevant NSW Government investment decisions in consultation with State agencies.</li> <li>• Where relevant data is available, councils are to identify the contribution of non-standard dwellings<sup>9</sup> (seniors housing, boarding houses and secondary dwellings) in relation to this indicative range.</li> <li>• Note: Population projections<sup>10</sup> are subject to review over time and will be managed in the medium term through updates to the GSRP and district plans. The NSW Government’s strategic documents outline the direction for planning land use, service and infrastructure delivery across NSW. Population</li> </ul>

<sup>7</sup> Source: City of Parramatta Draft Local Strategic Planning Statement 2036, page 22

<sup>8</sup> Source: <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Forecast-data>

<sup>9</sup> 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>

<sup>10</sup> Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Parramatta.pdf>



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	projections <sup>11</sup> are subject to review over time and will be managed through updates to the GSRP and district plans.
<p><b>8. Local Character</b></p> <p><i>Planning Priority C6, Action 18 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"> <li>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).</li> <li>Consult with DPIE on the approach to implementing local character.</li> </ul>
<p><b>9. Heritage</b></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"> <li>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.</li> </ul>
<p><b>10. Local Contributions</b></p> <p><i>Planning Priority N3, Action 9 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"> <li>Consult with DPIE regarding local contribution rates and the essential works list, particularly in the context of the GOPP PIC.</li> <li>Note: Confirm with DPIE if Council's Community Infrastructure Strategy requires approval to inform LEP updates, particularly in context of the GOPP PIC and Parramatta CBD Planning Proposal.</li> </ul>
<p><b>11. Place-based planning for local centres</b></p> <p><i>Planning Priority C6, Action 20 requires place-based planning to support the role of centres as a focus for connected neighbourhoods.</i></p>	<ul style="list-style-type: none"> <li>Work with DPIE on more detailed strategic planning for GOPP precincts which should provide indicative locations for future housing.</li> </ul>
<p><b>Productivity</b></p>	
<p><b>12. Industrial and Employment Lands Strategy</b></p>	<ul style="list-style-type: none"> <li>Note: The Central City District Plan identifies industrial and urban services land in Greater Parramatta as <i>Retain and Manage</i> and <i>Review and</i></li> </ul>

<sup>11</sup> Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Parramatta.pdf>





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<p><i>Planning Priority C11, Action 49 requires City of Parramatta Council to review and manage industrial and urban services land by undertaking a review of all industrial lands to confirm their retention or transition to higher order uses and prepare appropriate controls.</i></p>	<p><i>Manage.</i> The review will help inform the Commission’s work on Action 11 of the <i>Greater Sydney Region Plan – A Metropolis of Three Cities</i>.</p> <ul style="list-style-type: none"> <li>• Confirm with DPIE if Council’s Employment Lands Strategy Review and Update (2020) requires approval to inform LEP updates.</li> </ul>
<p><b>13. Growing a stronger and more competitive Greater Parramatta</b></p> <p><i>Planning Priority C7 requires City of Parramatta Council to strengthen the economic competitiveness of Parramatta (Action 23), prioritise public transport investment (Action 26) and investigate opportunities for the renewal of Westmead East as a mixed use precinct (Action 28).</i></p> <p><i>Planning Priority C8 promotes delivering a more connected and competitive GPOP Economic Corridor through Actions 29- 31.</i></p>	<ul style="list-style-type: none"> <li>• Note: A clear evidence base to provide for a diversified economic base for GPOP (including Parramatta CBD and local centres) will continue to be developed in collaboration with State agencies and Council.</li> <li>• Note: In accordance with the new approach to precincts, DPIE will prepare a Strategic Plan for GPOP. DPIE will also work collaboratively with Council to enable planning to be progressed, consistent with the NSW Government’s response to the Greater Sydney Commission’s GPOP PIC recommendations.</li> </ul>
<p><b>Sustainability</b></p>	
<p><b>14. Resilience to natural and urban hazards</b></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 areas most exposed to hazards (Action 82)</i></p>	<ul style="list-style-type: none"> <li>• Collaborate with the Greater Sydney Commission, other relevant state agencies and neighbouring councils to strengthen approaches to resilience in Council’s strategies, plans and program, particularly the: <ul style="list-style-type: none"> <li>○ Community Infrastructure Strategy;</li> <li>○ Blue Infrastructure Plan;</li> <li>○ Green Infrastructure Plan; and</li> <li>○ Schedule of Works.</li> </ul> </li> </ul>
<p><b>15. Open Space Strategy</b></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"> <li>• It is noted 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>’.</li> </ul>



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	<ul style="list-style-type: none"> <li>Consider the quality, quantity and access to open space within the Housing Diversity Precincts.</li> </ul>
<p><b>16. BASIX</b></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"> <li>Consult with DPIE regarding changes sought to BASIX standards.</li> </ul>
<p><b>17. Flooding and bushfire</b></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"> <li>Consult with DPIE and State agencies to prepare and manage flood and fire risk.</li> <li>Continue to consult with State agencies on finalisation of flood modelling and associated flood risk management study and plan to manage flood risk in the Parramatta LGA and guidance on land use limitations to reflect the flood risk.</li> </ul>
<p><b>Implementation</b></p>	
<p><b>18. Planning framework</b></p> <p><i>Section 6, Implementation, Figure 31.</i></p>	<ul style="list-style-type: none"> <li>Notwithstanding the content of the LSPS, Ministerial Directions under Section 9.1 of the EP&amp;A Act and State Environmental Planning Policies continue to apply to the LGA.</li> </ul>
<p><b>19. Updates to LSPS</b></p> <p><i>Planning Priority C21 requires Councils to prepare local strategic planning statements informed by local strategic planning.</i></p>	<ul style="list-style-type: none"> <li>Note: The LSPS includes a commitment to commence a review of the LSPS in 2021 following State Government's endorsement of the GPOP PIC<sup>12</sup>.</li> <li>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.</li> <li>Update the LSPS when key supporting studies including the Local Housing Strategy, Employment Lands strategy and Review and Open Space Strategy are completed, noting that the Local Housing Strategy</li> </ul>

<sup>12</sup> Source: City of Parramatta Draft Local Strategic Planning Statement 2036, page 13



Central City District Plan Themes/Priorities/Actions	Considerations for implementation of the LSPS
	and Employment Lands Strategy and Review should be approved by DPIE.
<p><b>20. Monitoring and review</b></p> <p><i>Implementation</i></p> <p><i>Planning Priority C21, Action 1 LEP Review and Section 3.8 (4a) EP&amp;A Act LEP Updates.</i></p>	<ul style="list-style-type: none"> <li>Progress on the implementation of the District Plan will be reviewed and monitored with a focus on actions that support LEP Updates.</li> </ul>
<p><b>21. Monitoring and review –</b></p> <p><i>Performance indicators</i></p> <p><i>Planning Priority C22, Action 2 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"> <li>Council is encouraged to apply the performance indicators in <i>The Pulse of Greater Sydney</i> which are available at LGA level<sup>13</sup>.</li> </ul>

<sup>13</sup> Source: <https://www.greater.sydney/pulse-of-greater-sydney>