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Letter of Support: Penrith City Council draft Local Strategic Planning Statement

Thank you for submitting Penrith 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 Penrith 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 and Employment Lands Strategy, Centres Strategy and Rural Lands and Villages 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 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 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 Penrith 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, 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 Penrith 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
Deputy Chief Commissioner
Chair of Assurance Panel

Elizabeth Dibbs
Western City District Commissioner
Assurance Panel Member
Commission Delegate

16 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 Penrith 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: North-South rail link in Western Parkland City: St Marys – Western Sydney Aerotropolis (WSA)-Badgerys Creek Aerotropolis; Infrastructure to support rapid bus connections and improved bus connections between WSA-Badgerys Creek Aerotropolis and Penrith, Liverpool, Blacktown and Campbelltown-Macarthur; ○ 10-20 year initiatives for investigation: Outer Sydney Orbital (motorway and freight rail) from Great Western Highway and Western Line to WSA-Badgerys Creek Aerotropolis, Western Sydney Freight Line; and ○ 20+ year visionary initiative: Outer Sydney Orbital (motorway and freight rail) from Great Western Highway and Western Line to Central

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>



	Coast; Bells Line of Road-Castlereagh Connection.
<p>2. Council-led transport initiatives</p> <p><i>Planning Priority W1.</i></p>	<ul style="list-style-type: none"> Note: The LSPS has included Council-led transport infrastructure initiatives and will require ongoing consultation and collaboration with State agencies including, 'desired future road links'.
<p>3. Western Sydney Aerotropolis</p> <p><i>Planning Priority W1, Action 2 seeks to sequence growth across the three cities to promote north-south and east-west connections.</i></p> <p><i>Planning Priority W1, Action 3 seeks to align forecast growth with infrastructure.</i></p> <p><i>Planning Priority W1, Action 4 seeks to sequence infrastructure provision using a place-based approach.</i></p> <p><i>Planning Priority W8 seeks to establish the land use and transport structure to deliver a liveable, productive and sustainable Western Parkland City.</i></p> <p><i>Planning Priority W13, Action 71 requires councils to implement the South Creek Corridor Project and use the design principles for South Creek to deliver a cool and green Western Parkland City.</i></p>	<ul style="list-style-type: none"> Note: The draft Western Sydney Aerotropolis Plan Discussion Paper on a proposed State Environmental Planning Policy and draft Western Sydney Aerotropolis Development Control Plan Phase 1 have recently been exhibited. It is further noted that the Western Sydney Planning Partnership has the responsibility for delivering the Final Plan and Precinct Plans within the Western Sydney Aerotropolis to the Minister for Planning and Public Spaces. In this context Council is to continue to work with the Western Sydney Planning Partnership and relevant State agencies to deliver the Western Economic Corridor, implement the South Creek urban design principles and deliver new communities that support: <ul style="list-style-type: none"> greater walkability; increased urban tree canopy; increased deep soil landscaping; and retention of water in the landscape.
<p>4. Greater Penrith to Eastern Creek Growth Area and place-based planning for local centres</p> <p><i>Planning Priority W1, Action 2 seeks to sequence growth across the three cities to promote north-south and east-west connections.</i></p> <p><i>Planning Priority W1, Action 3 seeks to align forecast growth with infrastructure.</i></p>	<ul style="list-style-type: none"> Note: The Department of Planning, Industry and Environment (DPIE) has published a new approach to precincts³ and confirms the Greater Penrith to Eastern Creek Growth Area as an area for strategic planning. In this context Council is to continue to work with DPIE, TfNSW and the Western Sydney Planning Partnership on:

³ Source: <https://www.planning.nsw.gov.au/Plans-for-your-area/A-new-approach-to-precincts>



<p><i>Planning Priority W1, Action 4 seeks to sequence infrastructure provision using a place-based approach.</i></p> <p><i>Planning Priority W6, 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"> ○ more detailed strategic planning for local centres which have been nominated as locations for future housing. ○ planning of precincts in the Greater Penrith to Eastern Creek Growth Area to deliver communities that support: <ul style="list-style-type: none"> ▪ greater walkability; ▪ increased urban tree canopy; ▪ increased deep soil landscaping; and ▪ retention of water in the landscape.
<p>5. 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 on the potential shared use agreements for school grounds and facilities to provide additional open space and community spaces, particularly in Growth Areas.
<p>Liveability</p>	
<p>6. 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 Guidelines⁴ require Council’s Local Housing Strategy to be approved by DPIE. ● As set out in the Local Housing Strategy Guideline⁵, 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 Scheme⁶. ● Undertake analysis on the viability of affordable rental housing target schemes as part of the development of

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/-/media/Files/DPE/Guidelines/Local-Housing-Strategy-Guideline-and-Template.pdf>

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



	Council's Local Housing Strategy and Affordable Housing Policy.
<p>7. Local Housing Strategy – <i>6-10 year housing target</i></p> <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>	<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 housing analysis identifies demand for 6,000 homes in the 2021-2026 period and 24,000 homes between 2016 and 2036⁷. ○ DPIE monitoring⁸ shows the current pipeline for the period 2019/20 to 2023/24 is 8,850 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 7,500 to 10,000 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, in particular the North-South rail link. • Where relevant data is available, councils are to identify the contribution of non-standard dwellings⁹ (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

⁷ Source: Penrith Local Strategic Planning Statement March 2020, p33

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

⁹ 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>



	projections ¹⁰ are subject to review over time and will be managed through updates to the Region and district plans.
<p>8. 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 Aboriginal, cultural and natural heritage in implementing the LSPS and developing LSPS updates.
<p>9. 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.
Productivity	
<p>10. Industrial and employment lands strategy</p> <p><i>Planning Priority W10, Action 51 requires Penrith Council to retain and manage industrial and urban services land, in line with the principles for managing industrial and urban services land by safeguarding all industrial zoned land.</i></p> <p><i>Planning Priority W10, Action 53 requires Penrith Council to plan and manage industrial and urban services land, in line with the principles for managing industrial and urban services land by creating additional industrial and urban services land where required in land release areas.</i></p>	<ul style="list-style-type: none"> Note: The Western City District Plan identifies industrial and urban services land in Penrith as ‘<i>Retain and manage</i>’ and ‘<i>Plan and manage</i>’ (in the Western Sydney Aerotropolis). Confirm with DPIE if Council’s Employment Lands Strategy will require approval to inform LEP updates. Consider further refining the Penrith Economic Triangle concept as part of Council’s Employment Lands Strategy, Centres Strategy and future LSPS updates.
<p>11. Metropolitan clusters and strategic centres</p> <p><i>Planning Priority W9, Action 43 requires Penrith Council to grow and strengthen the metropolitan cluster at Penrith.</i></p> <p><i>Planning Priority W11, Action 57 requires councils to provide access to jobs, goods and services in centres, Action 58 requires councils to prioritise strategic land use and infrastructure plans for</i></p>	<ul style="list-style-type: none"> Confirm with DPIE if the proposed Centres Strategy and place-based planning for strategic centres, requires approval to inform LEP updates. Continue to work with the Greater Sydney Commission and relevant stakeholders to deliver the actions in the Penrith Collaboration Area Place Strategy.

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



<p>growing centres and Action 66 requires Penrith Council to strengthen St Marys strategic centre.</p>	
<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 Council's work on its Rural Lands and Villages Strategy. • Confirm with DPIE if Council's Rural Lands and Villages Strategy requires approval to inform LEP updates.
<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 Sport and Recreation Strategy 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) and mitigate the urban heat island effect (Action 89).</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 Penrith Resilience Strategy and other place-based plans.
<p>16. Flooding</p> <p><i>Planning Priority W20 requires councils to adapt to the impacts of urban and natural hazards and climate change.</i></p>	<ul style="list-style-type: none"> • Consult with DPIE and State agencies to manage flood risk, including when: <ul style="list-style-type: none"> ○ Council's flood studies and floodplain risk management plans are reviewed and updated; and



	<ul style="list-style-type: none"> ○ managing flood risk in the Hawkesbury-Nepean Valley¹¹ and preparing guidance on land use limitations to reflect flood risk.
<p>17. Bushfire</p> <p><i>Planning Priority W20 requires councils to adapt to the impacts of urban and natural hazards and climate change.</i></p>	<ul style="list-style-type: none"> ● Consult with DPIE and State agencies to manage fire 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 at least every four years as the Community Strategic Plan is reviewed, or as needed to ensure it responds to local needs. ● 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.
<p>20. Monitoring and review – Implementation</p> <p><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</p> <p><i>Planning Priority W22 Action 92 requires the development of performance</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 levels¹².

¹¹ Source: Western City District Plan, p167

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



<p><i>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>	
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