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Letter of Support: Ku-ring-gai Council Draft Local Strategic Planning Statement

Thank you for submitting the Ku-ring-gai 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 Three Cities* 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 Ku-ring-gai Council's draft Local Strategic Planning Statement (November 2019) 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, Industrial and Employment Lands Strategy and Open Space Strategy) and this will inform and strengthen future updates to the LSPS.

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 Ku-ring-gai;
- 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 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 the Ku-ring-gai 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 (November 2019). 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

Deborah Dearing
North 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 Ku-ring-gai Council draft LSPS:

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</p> <p><i>Planning Priority N1, Action 3 seeks alignment of forecast growth with infrastructure.</i></p>	<ul style="list-style-type: none"> • Continue to consult with TfNSW on transport initiatives in Future Transport 2056¹ including: <ul style="list-style-type: none"> ○ 0-10 years initiatives for investigations in progress: Improved bus services between Northern Beaches and Chatswood, transport corridor from Mona Vale to Macquarie Park along the A3 corridor and More Trains, More Services program along the T1 North Shore Line. ○ 20+ years visionary initiatives: Address long term capacity constraints on the Pacific Highway.
<p>2. 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 Department of Education on the potential delivery of a new indoor sports facility for St Ives High School.
Liveability	
<p>3. Local Contributions</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"> • 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/delivering-future-transport-2056>



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<p>4. Local Housing Strategy</p> <p><i>Planning Priority N5, Action 17 requires councils to prepare Local Housing Strategies.</i></p> <p><i>Action 18 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 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. • It is further noted that council will investigate the capacity of Ku-ring-gai’s Local Centres and Neighbourhood Centres to accommodate housing. • Note: the Local Housing Strategy should be informed by NSW Government’s Guideline for Developing an Affordable Housing Contribution Scheme.³
<p>5. Local Housing Strategy - 6-10 Year Housing Target</p> <p><i>Planning Priority N5, Action 17(b) of the North District Plan 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 and housing strategies. The Commission notes: <ul style="list-style-type: none"> ○ Council’s 0-5 year housing target for the period 2016/17-2021/22 is 4,000 additional dwellings. ○ Council’s housing analysis indicates a 6-10 year target will be developed though the Local Housing Strategy and local centres will be the focus for delivering the target. ○ DPIE monitoring⁴ shows the current pipeline for 2019/20 to 2023/24 is 3,350 dwellings.

² Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/Local-Housing-Strategy-Guideline-and-Template.pdf>

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>



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	<ul style="list-style-type: none"> In this context council is to show how they can meet an indicative draft range for 6-10 year housing target of 3,000 to 3,600 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 (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 overtime and will be managed in the medium term through updates to Region and district plans⁶.
<p>6. Local Character</p> <p><i>Planning Priority N6, Action 19(e) includes deliver great places by recognising and celebrating the character of a place and its people.</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 2017, Better Placed: An integrated design policy for the built environment of NSW South Wales. Consult with DPIE on the approach to implementing local character including the application to exclude or vary state-wide policy⁷.

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).

⁶ <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-Ku-ring-gai.pdf>
For more information refer to <https://www.planning.nsw.gov.au/Research-and-Demography/Sydney-Housing-Supply-Forecast/Other-forms-of-housing>

⁷ 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>7. 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> <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"> • Consult with DPIE on place-based planning 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 Retail and Commercial Study with a focus on local centres. ○ Preparation of a Public Domain Strategy and Public Domain Plans. • Place-based planning should have regard to findings of the Local Housing Strategy and Retail and Commercial study.
<p>8. 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 Aboriginal, cultural and natural heritage in implementing the LSPS and developing LSPS updates. • Consult with DPIE on application of Seniors Living SEPP in Heritage Conversation Areas having regard to seniors housing needs identified in the Local Housing Strategy.
<p>Productivity</p>	
<p>9. Industrial and Employment Lands Strategy</p> <p><i>Planning Priority N11, Action 46 requires Ku-ring-gai 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 Ku-ring-gai as Retain and Manage. In updating LEPs, councils are to conduct a strategic review of industrial lands. • An updated Employment Lands Strategy should have regard to the role of Sydney's Adventist Hospital and CSIRO. • Confirm with DPIE if Council's Employment Lands Strategy require approval to inform LEP updates.
<p>Sustainability</p>	
<p>10. Open Space Strategy</p> <p><i>Planning Priority N20, Action 73 requires Council to maximise the use of existing open space and</i></p>	<ul style="list-style-type: none"> • Consider Councils 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'.



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<i>protect, enhance and expand public open space.</i>	<ul style="list-style-type: none"> • Confirm with DPIE if Council's Open Space and Recreation Strategy 2019 requires approval to inform LEP updates. • As part of place-based planning for centres, review Open Space Strategy having regard to access to open space as set out in the North District Plan.
<p>11. 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>12. BASIX</p> <p><i>Planning Priority N21 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>13. Resilience to natural and urban hazards</p> <p><i>Planning Priority N22 Action 80 and 81 require Council 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 relevant State agencies and neighbouring councils to strengthen approaches to resilience as part of Council's review of its Climate Change Adaptation Strategy and other initiatives to address natural hazards.
<p>14. Flooding and bushfire</p> <p><i>Planning Priority N22 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 work with State agencies to manage flood and fire risk.
Implementation	
<p>15. 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



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	<p>Act and State Environmental Planning Policies continue to apply to the LGA.</p>
<p>16. Updates to LSPS <i>Planning Priority N23, Preparing local strategic planning statements informed by local strategic planning</i></p>	<ul style="list-style-type: none"> Note: The LSPS includes a commitment for Council to review its LSPS in the 3 to 5 year timeframe. 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.
<p>17. Monitoring and Review - Implementation <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>18. Monitoring and Review – Performance Indicators <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 the recently released <i>Pulse of Greater Sydney</i> which includes data available at Region, District and LGA level.⁸

⁸Source: <https://www.greater.sydney/pulse-of-greater-sydney>