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Letter of Support: Camden Council Draft Local Strategic Planning Statement

Thank you for submitting the Camden 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 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 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* (EP&A Act).

We confirm that the Commission supports Camden 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 intent to undertake significant work to develop a strategic planning evidence base (including a Local Housing Study and Strategy, Employment Study, Centres Study and Strategy and Blue and Green Grid Analysis) that will inform and strengthen future updates to your LSPS.

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 a Local Housing Strategy for Camden;
- 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 and strategies, 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 Camden 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,

Lucy Turnbull AO
Chief Commissioner
Chair of Assurance Panel
Commission Delegate

Elizabeth Dibbs
Western City District Commissioner
Assurance Panel Member

05 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 Camden draft LSPS:

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</p> <p><i>Planning Priority W1, Action 1 Prioritise infrastructure investments to support vision of A Metropolis of Three Cities</i></p> <p><i>Planning Priority W1, Action 3 Align forecast growth with infrastructure.</i></p> <p><i>Planning Priority W7, Action 32 Protect transport corridors as appropriate, including the Western Sydney Freight Line and the Outer Sydney Orbital.</i></p>	<ul style="list-style-type: none"> • Continue to consult with TfNSW on planning for city-shaping transport initiatives in Future Transport 2056¹ including: <ul style="list-style-type: none"> • 0-10 year committed initiatives in progress: Western Sydney Infrastructure Plan, including the Western Sydney Growth Roads Program. • 0-10 year investigation initiatives in progress: North South rail link in Western Parkland City: Aerotropolis to Campbelltown-Macarthur. • 0-10 year investigation initiatives in progress: Infrastructure to support rapid bus connections and improved bus connections in the Western Parkland City. • 20+ years visionary initiative: Outer Sydney Orbital from Aerotropolis to Hume Motorway.
<p>2. Local infrastructure planning</p> <p><i>Planning Priority W1, Action 3 Align forecast growth with infrastructure.</i></p>	<ul style="list-style-type: none"> • Continue to consult with Department of Planning, Industry and Environment (DPIE) on the review of Camden’s local infrastructure contributions plan.
<p>3. State-led growth area and precinct planning</p> <p><i>Planning Priority W1, Action 3 Align forecast growth with infrastructure.</i></p>	<ul style="list-style-type: none"> • Continue to work with DPIE on the preparation of the Special Infrastructure Contribution for the South West Growth Area. • Continue to work with DPIE to ensure the development of new urban communities in Growth Areas that support:

¹ Source: <https://future.transport.nsw.gov.au/delivering-future-transport-2056>



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<p><i>Planning Priority W1, Action 4</i> <i>Sequence infrastructure provision using a place-based approach.</i></p>	<ul style="list-style-type: none"> • Greater walkability • Increased urban tree canopy • Increased deep soil landscaping • Retention of water in the landscape
Liveability	
<p>4. Local Housing Strategy</p> <p><i>Planning Priority W5, Action 17</i> <i>requires Council to prepare a Local Housing Strategy</i></p> <p><i>Planning Priority W5, Action 18</i> <i>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 Guidelines² require Council’s Local Housing Strategy to be approved by the Department of Planning, Industry and Environment (DPIE). • Finalise the Camden Housing Study and Camden Housing Diversity Analysis and use these to inform a Local Housing Strategy. • 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. • Note: the Local Housing Strategy should be informed by the NSW Government’s Guideline for Developing an Affordable Housing Contribution Scheme³.
<p>5. Local Housing Strategy – 6-10 Year Housing Target</p> <p><i>Planning Priority W5, Action 17(b)</i> <i>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"> • The draft LSPS states that over the past five years, housing delivery in Camden has provided an average of 2,400 dwellings completed per

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/Policy-and-Legislation/Housing/Diverse-and-affordable-housing/-/media/C6F1D0F0359C4AB7A28C90BE7DEEE636.ashx>



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	<p>year and a high of 3,100 dwellings completed in 2018/19⁴.</p> <ul style="list-style-type: none"> • The draft LSPS states approvals are on track for over 12,000 dwellings in the period 2016 to 2025 and that the Local Housing Strategy will use past completions to inform the 6-10 year (2021/22 to 2025/26) housing target⁵. • DPIE monitoring⁶ shows the current pipeline 2019/20 to 2023/24 of 10,900 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 10,000 – 12,500 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 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 projections⁸ are subject to review over time and will be managed through updates to the Region and district plans.
<p>6. Local Character</p>	<ul style="list-style-type: none"> • Note: In identifying local character and/or desired future character, Council should have reference to the NSW

⁴ Source: Draft Camden Local Strategic Planning Statement December 2019, p38

⁵ Source: Draft Camden Local Strategic Planning Statement December 2019, p38

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

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 SEPPs such as seniors, boarding houses and affordable rental (granny flats).

⁸ Source: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Factsheets-and-faqs/Research-and-demography/Population-projections/2019-The-Hills.pdf>



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<p><i>Planning Priority W6, Action 19 includes "Deliver great places" through recognition and celebration of the character of a place and its people</i></p>	<p>Government Local Character and Place Guideline 2019 and Government Architect NSW 2017, Better Placed: An integrated design policy for the built environment of NSW.</p> <ul style="list-style-type: none"> Consult with DPIE about the application and effect of nominating Local Character Areas.
Productivity	
<p>7. Industrial and Employment Lands Strategy</p> <p><i>Planning Priority W10, Action 51 requires Camden Council to retain and manage industrial and urban service land (within existing urban areas)</i></p> <p><i>Planning Priority W10, Action 53 requires Camden Council to plan and manage industrial and urban service land (within land release areas).</i></p>	<ul style="list-style-type: none"> Note: The Western City District Plan identifies industrial and urban services land in Camden as <i>Retain and Manage</i> and <i>Plan and Manage</i>. Consult with DPIE during the preparation of Camden's Centres Strategy and Employment Study and confirm if these will require approval from DPIE to inform LEP updates.
<p>8. Strategic Centres</p> <p><i>Planning Priority W11 requires Camden to grow investment, business opportunities and jobs in Leppington and Narellan strategic centres (Actions 63 and 64), prioritise strategic land use and infrastructure plans for growing centres (Action 58), provide access to jobs, goods and services in centres (Action 56) and create new centres in accordance with the Principles for Greater Sydney's Centres (Action 57).</i></p>	<ul style="list-style-type: none"> Consult with DPIE during the preparation of the vision and planning for Narellan Strategic Centre, Leppington Town Centre Review and Camden's Centres and Employment Lands Strategy and confirm if this Strategy will require approval from DPIE to inform LEP updates. Consult with TfNSW in relation to land at Oran Park and Narellan that has been identified for potential future train stations⁹.
Sustainability	
<p>9. 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"> Complete the Green and Blue Grid Analysis for Camden and consider how this might: <ul style="list-style-type: none"> support Council's contribution to the Premier's Priority to 'Increase the proportion of homes in urban areas within 10 minutes' walk of quality

⁹ Source: Passenger rail corridors identification, Transport for NSW, March 2018. P6



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	<p><i>green, open and public space by 10 per cent by 2023’.</i></p> <ul style="list-style-type: none"> inform the review of the local infrastructure contributions plan in relation to riparian corridors.
<p>10. 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 Council’s to support the growth of the agribusiness sector in the Western Parkland City. Confirm with DPIE if Council’s Rural Strategy (2018) requires approval from DPIE to inform LEP updates.
<p>11. Resilience to natural and urban hazards</p> <p><i>Planning Priority W22 requires Camden Council to support initiatives that respond to the impacts of climate change (Action 87) and to Mitigate the urban heat island effect and reduce vulnerability to extreme heat (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 as part of Council’s climate risk assessment, and review of planning controls for flood prone land. Complete the Green and Blue Grid Analysis for Camden and consider how this might support resilience to extreme heat and the urban heat island effect. Use place-based planning, including the master planning of Narellan Town Centre and the Leppington Town Centre Review, to support greater resilience to natural and urban hazards, including extreme heat.
Implementation	
<p>12. 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.



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<p>13. Updates to LSPS</p> <p><i>Planning Priority W21, Action 91 requires Council to preparing local strategic planning statements informed by local strategic planning</i></p>	<ul style="list-style-type: none"> • The LSPS includes a commitment to review the LSPS in 2020 and every four years to align with Council’s overarching community strategic planning. • 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>14. 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>15. Monitoring and Review – Performance Indicators</p> <p><i>Planning Priority W22 Action 92 requires the development of performance indicators in consultation with state agencies and councils that ensure 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 levels¹⁰.

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