

Australia's property industry

Creating for Generations

3 September 2019

Mr Hamish McNulty
General Manager
Cumberland Council
PO Box 42
MERRYLANDS NSW 2160

Dear Mr McNulty

Cumberland Council– Draft Local Strategic Planning Statement

The Property Council welcomes the opportunity to provide comments on council's draft Local Strategic Planning Statement (LSPS).

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers, and developers of property across all asset classes. We are pleased to provide the following comments for your consideration.

The Property Council supports the position taken by Council to use the LSPS as a mechanism for the translation and give effect to the land-use based strategies identified in Council's Community Strategic Plan 2017-2027. It has appropriately identified a range of steps Council must take in planning for the city's future and respond to the Greater Sydney Commission's *Greater Sydney Regional Plan* and *Central City District Plan*.

Our members look forward to the finalisation of Council's draft LSPS by 30 March 2020 and the subsequent process that will involve Council updating the *Auburn Local Environmental Plan 2010* and the *Holroyd Local Environmental Plan 2013* to give effect to the relevant provisions of the regional and district plans.

Comments on specific parts of the draft LSPS are provided in the following submission.

Should you have any questions in respect to this matter, please contact Troy Loveday, Senior Policy Advisor, on (02) 9033 1907 or tloveday@propertycouncil.com.au

Yours sincerely



Jane Fitzgerald
NSW Executive Director
Property Council of Australia

Local Strategic Planning Statement

Getting Around: Access and Movement

Council has identified four local planning priorities (LPP) aligned to the Infrastructure and collaboration theme in the Central City District Plan to provide improved accessibility both within Cumberland LGA and to/from the LGA.

Local Planning Priority 1 – Strengthening Cumberland’s position in the Central City District through collaboration.

The draft LSPS has identified a single ongoing action which continues existing collaboration and engagement strategy between Council and other stakeholders (Government, industry and community) to deliver land use outcomes. This is a very important issue for the Cumberland LGA that is deserving of the importance that it has been given. It is recommended that Council provide more specific detail regarding on how this action will be delivered and specific examples of the outcomes that will allow Council’s performance in this area to be measured.

Local Planning Priority 2 –Advocate for a range of transport options that connect our town centres and employment hubs, both locally and to Greater Sydney.

The draft LSPS has identified two actions (comprising both short and medium-term actions) that will contribute towards implementation of this LPP. It is acknowledged that Council does not have responsibility for the planning, delivery or funding decisions of major transport projects. These are the responsibility of State Government agencies. The Property Council is supportive of the actions proposed by Council to advocate for both new and improved regional transport services to its local community.

Local Planning Priority 3 – Align local infrastructure delivery with planned growth

The draft LSPS has identified a single action (to be completed in the short-term) to implement this LPP. The action proposes to continue existing engagement with government, industry and community stakeholders.

It would be desirable if the draft LSPS could be more specific in terms of the types of infrastructure items that are required and the proposed method of delivering them. It is recommended that Council provide more information about the type of actions it is considering under this LPP. Specifically, Council should provide more detail about how it will deliver vital local infrastructure (open space and community facilities) for increased population growth.

Local Planning Priority 4 – Improve accessibility within our town centres

In respect of this LPP, the draft LSPS has identified a single action (to be completed in the short term) that will lead to its implementation. The action involves Council advocating for improved transport options (supporting walking, cycling and public transport access) within Cumberland’s local centres.

It is recommended that Council outline in more detail how it will deliver the transport improvements that will fulfil this LPP. The draft LSPS should provide clarification about the types of works either by reference to its Contributions Plan or works schedules of adopted masterplans for its local centres. Details for funding and delivery of specific actions should be provided.

Places and Spaces for Everyone: Housing and Community

Local Planning Priority 5 – Deliver housing delivery to suit changing needs.

The draft LSPS has identified two actions (both short term) that will deliver on this LPP. Both actions require Council completing background studies and updating planning controls to provide for future housing supply.

It is unclear from the LSPS what steps Council intends to take in respect of meeting its housing targets set by the Greater Sydney Commission (GSC) and set out in the Central City District Plan. Council should also give more detailed explanation for the steps to be completed as part of the development of its Housing Strategy and how this will inform changes to the Local Environmental Plan to give effect to the district plan.

Local Planning Priority 6 – Deliver affordable housing suitable for the needs of all people at various stages of their lives.

The draft LSPS has identified two actions (both short-term) that will deliver on this LPP. These actions involve completion of relevant studies and the identification of opportunities to support the planning and delivery of affordable housing.

The Property Council support's the GSC's affordable housing target of between 5-10% of the uplift in dwellings subject to feasibility. Council should continue to work with the GSC on the implementation of this policy.

Local Planning Priority 7 – Design vibrant and attractive centres.

The draft LSPS has identified two actions (both short-term) that will deliver on this LPP. The Council's desire to create vibrant and attractive centres within the Cumberland LGA are supported by the Property Council. It is recommended that Council elaborate on the specific actions and indicate how they will achieve the desired outcome.

Council has stated that it will implement place-based planning for its centres to deliver a suite of desirable goals including, walkable places, well-designed buildings, attractive streetscapes, parks and public spaces. More detail on what is involved with this should be made available and provide clarity regarding its implementation.

It is not clear how the Cumberland Design Excellence Panel will differ from the role of Design Review Panels under SEPP 65 that have has more than 15 years to enforce the SEPP's design principles and the Apartment Design Guide. Council should outline how the new panel will deliver a different outcome from the existing process.

Local Planning Priority 8 – Celebrate our natural, built and cultural diversity.

The draft LSPS has identified three actions (two short-term and one ongoing) that will contribute towards the implementation of this LPP. More detail is required from Council about how the cultural diversity will be recognised and supported.

The actions have only indicated that there will be support given to this LPP through current strategies, plans and programs and the Cultural Plan and heritage studies will be progressed further. The Property Council recommends that Council consider how once completed the studies and plans will contribute towards this goal through implementation.

Local Planning Priority 9 – Provide high quality, fit for purpose community and social infrastructure in line with growth and changing requirements.

The draft LSPS has identified three actions (one short-term and two ongoing) that will deliver on this LPP. These actions involve Council completing a strategy in the short-term and ongoing advocacy and implementation of unspecified strategies, plans and programs.

The Council's desire to provide the local community with superior community/social infrastructure is supported by the Property Council. The draft LSPS should provide greater detail about how social infrastructure will be delivered (planning/funding) for the expected growth in population.

Local Jobs and Businesses: Economy, Employment and Centres

Local Planning Priority 10 – Support a strong and diverse local economy across town centres and employment hubs.

The draft LSPS has identified two actions (one short-term and one ongoing) that will deliver on this LPP. The primary focus of Council's actions is to advocate for recognition of Merryland's status as a strategic centre. The ongoing action involves the provision of support to business and industry because they are an important element to the local economy and culture.

The Property Council is supportive of Council's desire for a strong and diverse local economy focused on town centres and employment hubs. It would be helpful if Council consider other actions that could also contribute towards achieving this goal. A particular focus could be the contribution that traditional retail and bulky goods retail make to the local economy and how Council can support a perceived strength for the local economy. There should be a specific action relating to any relevant recommendations from the Parramatta Road Corridor Transformation Strategy.

Local Planning Priority 11 – Promote access to local jobs, education opportunities and care services.

The draft LSPS has identified a single ongoing action involving continuing its current response through its strategies, plans and programs in order to meet the delivery of this LPP. The Council's desire to promote access to local jobs and educational opportunities is supported by the Property Council.

Council is concerned that local residents must travel outside the area for employment and education employment opportunities. The Property Council supports initiatives developed by Council to increase opportunities for residents to work closer to their homes and promote greater diversity of jobs.

It is recommended that additional and more specific actions related to this LPP are detailed in the draft LSPS. Currently, the stated action is too vague and open ended.

Local Planning Priority 12 – Facilitate the evolution of employment and innovation lands to meet future needs.

The draft LSPS has identified three actions (one short-term and two ongoing) that will contribute towards the implementation of this LPP. The Council's desire to support the evolution of employment and innovation lands has merit and is welcomed by the Property Council.

The targeted actions in relation to the long-term future of both the Yennora and Clyde intermodal terminals are supported.

The Great Outdoors: Environment and Open Spaces

Local Planning Priority 13 – Protect, enhance and increase our natural and green spaces

The draft LSPS identifies three actions (two short-term and one ongoing) that will contribute towards the implementation of this LPP. The protection and enhancement of existing open space and provision of new green space is supported.

Council is faced with a challenging task to provide for useable open space and natural areas in a highly urbanised environment. Given Council has about 700 hectares of green space under its care that it needs to maintain, it is vital that these areas are well managed and provide suitable facilities for local communities.

Local Planning Priority 14 – Improve access and health of waterways

The draft LSPS has identified two actions (both short-term) that will contribute towards the implementation of this LPP. Initiatives aimed at improving access to and the health of waterways is supported.

Council has stated that it is progressing a range of opportunities in this area, including a reduction in stormwater runoff through Water Sensitive Urban Design (WSUD), the role of planning controls and initiatives to improve water quality. These are acceptable actions for Council to progress and where there would be any consequential change to planning regulation, the Property Council will give them further consideration and provide detailed input.

Local Planning Priority 15 – Plan for a resilient city that can adapt to natural hazards and climate change.

The draft LSPS has identified a single ongoing action that will contribute to the implementation of this LPP. Council's efforts to plan for a resilient city are supported.

Local Planning Priority 16 – Support urban cooling to minimise heat island effects.

The draft LSPS has identified a single ongoing action that will contribute to supporting the delivery of this LPP. Council's plans to influence urban form in new development areas so they are landscape led, water retained by permeable surfaces and irrigated tree canopy are noted. Where the actions lead to changes to regulations for property development, the Property Council looks forward to the future consultation associated with those changes.

Implementation, Monitoring and Reporting

The draft LSPS indicates that the strategic directions and initiatives will be reviewed every five years to take into consideration changing regional and district context. It is noted that there is a statutory requirement for a LSPS to be updated every seven years. The Property Council looks forward to the next steps in the making of Council's LSPS, including the completion of required studies and the eventual updating of the Council's Local Environmental Plan to align with the *Greater Sydney Regional Plan* and *Central City District Plan*.