



Mr Matthew Stewart
General Manager
City of Canterbury Bankstown Council
PO Box 8
BANKSTOWN NSW 1885

Dear Mr Stewart

City of Canterbury Bankstown Local Housing Strategy

Thank you for submitting Canterbury Bankstown Council's Local Housing Strategy (LHS) and additional supporting information to the Department.

The Department commends Council on preparing a robust evidence base to support its LHS, providing Council with a general understanding of the current and future housing needs of the Canterbury Bankstown local government area (LGA). We acknowledge that Council seeks to provide virtually all new housing in the LGA by utilising capacity under existing controls and through additional planning proposals.

I can confirm that I have approved Canterbury Bankstown Council's LHS, dated June 2020. My decision reflects the analysis undertaken to comply with the comprehensive strategic planning framework and the evidence base to inform your LHS to deliver a minimum 12,500 dwellings for the period 2021-26.

In doing so, I have determined that:

- The supplementary information provided by Council provides sufficient information to implement the intent of the LHS. This information must be considered in conjunction with the LHS. Without this information, the LHS is insufficient.
- The LHS addresses housing supply, including the 6-10 year housing target, to be delivered mainly through existing capacity and Council's centres-based masterplanning program, with further clarification in relation to timeframes, capacity and housing diversity.
- The LHS addresses the need for housing diversity, subject to the requirements identified below. Seniors housing is to be enabled through proposed amendments to planning controls through the Consolidated LEP. The LHS also proposes other measures to encourage housing diversity such as minimum unit mix requirements, greater universal housing design requirements and encouragement of student housing.
- The LHS addresses housing affordability, subject to the requirements identified below. Additional information from Council indicated a SEPP70 scheme would be prepared and that bespoke affordable housing targets would be applied in conjunction with each individual centres' masterplan.

- The LHS is generally consistent with Section 9.1 Directions and SEPPs, subject to the requirements identified below.
- The LHS is consistent with the South District Plan, subject to the requirements identified below.

My approval of the LHS is subject to the following requirements:

1. Council is to prepare, commence working and submit a comprehensive work program and Implementation and Delivery Plan to the LHS within three months of this approval being granted and to share this with the Department. The Implementation and Delivery Plan should also include any associated housing delivery information from Council's LSPS. This is to ensure that the Department and other State agencies have a clear understanding of the roles and responsibilities required to deliver Canterbury Bankstown's housing pipeline. This implementation plan is to include the housing capacity, dwelling yield, location and timeframes associated with each mechanism/action.
2. That the implementation plans are to be considered part (and can be a separate document or annexure) of the LHS, as it provides indicative timing, dwelling targets and actions required to be undertaken by Council to achieve its targets. The programs identified in the additional information provided to the Department by Council (and included in the Advisory Notes) must be relied upon and included in the Implementation and Delivery Plan (as included in recommendation 1 above), as Council has provided no detailed Implementation and Delivery Plan in the LHS.
3. Council and the Department continue to progress the work on the Sydenham to Bankstown Corridor and the Sydney Metro City and Southwest corridor, with a status update and actions for both Council and the Department to undertake to be provided within six months of this approval.
4. Council collaborate with the Department and LAHC to ensure housing is delivered through Riverwood Estate in the 10+ (2026+) year period.
5. As committed in the LHS, Council is to prepare an Affordable Housing Contribution Scheme (AHCS) that commits Council to examining the feasibility of levying affordable housing contributions for any new planning proposals that will result in development uplift or an increase in land value. It is noted that Council has commenced this work and Council is required to finalise this AHCS by the end of 2021. Council should inform the Department if there is to be any change and impacts in affordable housing targets.
6. That Council continue to work with the Department and the GSC to investigate and then potentially deliver a strategy for the Canterbury Racecourse site, noting that any dwellings for this site are likely to be delivered within the 10+ year (2026+) period.
7. That Council investigates locations for diverse housing typologies (including medium density) as part of its masterplanning program, including the preparation of a masterplan for each of the strategic, town, local, village and small village centres. Housing diversity within these centres includes apartment mixes, medium density housing, seniors housing, student housing and affordable housing.

8. That Section 6.5 (recommended revisions to planning controls) of the LHS is to be subject to further investigation and collaboration with the Department.
9. Changes to planning controls within planning proposals must be evidence based and supported by an impact assessment that considers consistency with the District Plan and Section 9.1 Ministerial Directions. This is required to support planning proposals.
10. The proposed down-zoning of land from R3 to R2 is not supported in its current form by the Department. Council has identified the need for medium-density housing. Council is required to undertake community consultation in relation to this matter and to continue to collaborate with the Department to determine a suitable outcome by April 2022 and consider any implications to Ministerial Directions 9.1.
11. Council is required to ensure consistency between the LSPS and LHS, with the LSPS taking priority. It is noted that the housing priority, number of centres and planning for centres mapping in the LSPS varies from the centres where housing is proposed to be planned for in the LHS. This clarification can be undertaken as part of the preparation and commencement of a comprehensive work program and implementation to be prepared as part of Requirement 1 (above).
12. Council is to monitor and review the supply and delivery of housing, in particular to track its performance against the 6-10 year housing target and to evaluate what additional medium-density and seniors housing continues to be delivered. A monitoring and review system will ensure that appropriate mechanisms can be identified and implemented to meet Canterbury Bankstown's housing needs over the medium- to long-term.
13. The direction and strategic planning approaches endorsed in State-led precinct plans are to prevail in the event of any inconsistency with this approval and/or Council's LHS (as revised and current).
14. Council is to update or revise the LHS to inform its LSPS following the making of a future District Plan. DPIE following the approval of the next LHS by Council can also endorse the strategy.

Any planning proposals for new housing development will be assessed against Council's LHS, the requirements above and Advisory Notes attached. Any State Government policy changes that may occur in the future are to prevail in the event of any inconsistency.

Implementing your Local Housing Strategy

The State Government is committed to reducing the time taken to complete planning proposals that support housing delivery by tailoring the steps in the process to the complexity of the proposal, and by providing clear and publicly available justification for each plan at an early stage.

To meet these commitments, a detailed implementation plan is required. This should reflect a comprehensive work program for all strategic planning work Council commits to undertake to implement its Local Housing Strategy, and should include but not be limited to:

- Implementation of a review system in achieving the LHS.
- Establishment of housing targets for medium-density and seniors housing to determine whether future changes to the LEP and/or DCP are required to incentivise or encourage housing diversity and diversity of housing typologies.
- Specific actions relating to Council's commitment to review controls for accessible housing, including consultation with the community and housing providers to understand the suitability of controls and their implementation.
- The preparation of an AHCS.

Local Housing Strategy Reviews and Updates

A review and update process will provide an opportunity to align Council's LHS and LSPS, together with the housing targets and diversity outlined in the District plan, ensuring a cohesive strategic planning framework is in place for Canterbury Bankstown LGA.

It will also provide Council with the opportunity to improve and clarify aspects of the LHS. The Advisory Notes enclosed provide specific guidance on matters that Council is encouraged to consider when updating the LHS. The Department will expect these same matters to be addressed in planning proposals and will be reinforcing them through Gateway determinations as an interim measure in the absence of the LHS review process.

We strongly recommend that council also review and revise (where required) its LHS before the LSPS is required to be reviewed by the GSC. This will help best inform the next update to the LSPS.

Once again, I would like to take this opportunity to acknowledge the significant amount of work your team has undertaken to develop the LHS. Please be advised that the LHS will be published on the NSW ePlanning Portal alongside this letter of approval and advisory notes.

Should you have any further questions, please contact myself or Jenny Rudolph Director Local Strategy and Plan Making on 902 8275 1030.

Yours sincerely



Amanda Harvey
Executive Director
Local Strategies and Plan Making

25 June 2021

Encl: Advisory Notes



Canterbury Bankstown Council Local Housing Strategy

Advisory Notes

The following advisory notes identify the further work Council will need to undertake to strongly position future planning proposals and further iterations of the Local Housing Strategy (LHS). The advisory notes provide specific guidance on matters that Council is encouraged to consider when updating the LHS. The Department will expect these same matters to be addressed in planning proposals (where relevant) and that these will be reinforced through Gateway determinations as an interim measure in the absence of the LHS review process.

Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
General	
Implementation	<p>Future iterations of the LHS should be underpinned by an Implementation Plan with a priority work program, clearly defined roles, responsibilities and definitive timeframes with risks and dependencies identified and clarity around delivery and anticipated yields. Acknowledging that the current LSPS includes housing and actions, it is considered prudent that in the future all the information relating to housing delivery be included in the implementation plan. The Plan should be prepared in consultation with DPIE, Transport for NSW (TfSNW) and SINSW, to ensure any critical interdependencies are satisfactorily resolved. This is encouraged to be informed by resourcing and budgets to demonstrate how housing targets will be delivered.</p> <p>The implementation plan should specifically address work streams related to items identified in Councils work program, and include:-</p> <ol style="list-style-type: none">1. Council identify the relationship between the centres-based masterplanning program being undertaken by Council and the broader Sydenham to Bankstown Corridor work, to avoid duplication and confusion.2. Council identify the Sydney Metro City and Southwest route in its mapping, identify its interface and interdependencies with Council’s masterplanning program, and demonstrate how particular centres may have been prioritised in the masterplanning program to capitalise on the delivery of the Metro line.3. Council provide an existing capacity analysis and proposed capacity analysis of the Canterbury Road corridor, in order to demonstrate any reduction in dwellings along the corridor and the impacts this may have on dwelling capacity, supply and delivery.4. Council include an update on the Bardwell Park Precinct, the timing of the delivery of the plan and the potential yield.



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	<ol style="list-style-type: none"> 5. Council clearly identifies State Significant sites and precincts in future iterations of the LHS. This will assist in determining where collaboration between various agencies may be required to ensure delivery of housing in the target periods. 6. Council includes implementation programs (such as those provided in the additional information) within future iterations of the LHS, to ensure clarity around delivery of housing and anticipated dwelling yields and collaborate with the Department to achieve the timeframes set out by Council in the implementation programs. 7. Council includes implementation programs and anticipated sources of 10+ year housing supply within future iterations of the LHS, to ensure clarity around delivery of housing and capacity to continue to provide housing in the future. 8. Council, where practical, use the same datasets for the LSPS and LHS, to ensure consistency. 9. Consider the actions and timeframes identified in Council’s LSPS and the GSC’s Letter of Assurance. 10. Any future iterations of the LHS address feedback provided through the exhibition and community engagement process of the LHS.
Review and monitoring framework	Revisions to the LHS may be required in response to significant changes in the LGA such as announcements on new infrastructure investment and employment opportunities, significant changes in projected population growth or updates to the LSPS. The framework should also review the supply and delivery of housing, including the 6-10 year housing target and targets for medium density and seniors housing.
Infrastructure	Future iterations of the LHS should detail the key local and State infrastructure commitments and investment decisions that will support the unlocking of housing supply. This analysis should consider public and active transport, education and health facilities, open space, community infrastructure, drinking supply, wastewater and utility services. Council is encouraged to cross reference any endorsed Council strategies and plans, where relevant, and collaborate with DPIE and other State agencies (and in particular Schools Infrastructure NSW (SINSW), Sydney Water and TfNSW) to ensure identified opportunities are realistic and accurately reflect staging, sequencing, servicing and delivery of critical infrastructure such as public transport, education facilities and drinking supply and waste water services. Thresholds/triggers, funding, responsibilities for delivery and indicative timeframes should also be identified. It is acknowledged that Council is able to detail infrastructure commitments where they are available, or arising from engagement with agencies, and commitments change over time.



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
<p>Making appropriate provision for any additional housing opportunities that may arise out of sequence</p>	<p>The inclusion of a transparent and robust framework to consider additional opportunities will assist Council, the Department and other relevant agencies to assess proposals that are inconsistent with the LHS. It will also ensure that changes to land use or development controls do not take place without demonstrating strong strategic merit. Council is encouraged to develop a framework within which to consider such proposals, including but not limited to the following heads of consideration:</p> <ul style="list-style-type: none"> • Strategic merit and case for change • Robust demographic evidence • Housing Affordability and Diversity • Demand analysis and economic impacts • Infrastructure delivery and funding to be borne by the proponent • Stakeholder consultation and outcomes • Sustainability and resilience <p>The LSPS could be an appropriate place for providing a framework with criteria for assessing ad-hoc proposals and weighing them against considerations such as infrastructure, economic impacts, sustainability and resilience.</p>
<p>Community and Stakeholder Engagement</p>	<p>Incorporate the findings of any future relevant community and stakeholder engagement in the LHS.</p>
<p>Consultation and engagement with agencies</p>	<p>Council should continue consultation with the following agencies:</p> <ul style="list-style-type: none"> • TfNSW in relation to the Sydney Metro City and Southwest line • Sydney Trains • SINSW: <ul style="list-style-type: none"> ○ Prior to the finalisation of any future strategy or planning proposal that proposes a significant increase in the number of dwellings; and ○ When Council is aware of variations in the following: <ul style="list-style-type: none"> - The actual number of lots or dwellings varying from planning proposal estimates / strategic plans. - An emerging demographic that varies from the planned population profile, either with more or less families with children. - Rates of development and dwelling take-up varying from planned release programs or forecast residential take-up rates.



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	<p>This is to ensure SINSW specifically understands where growth, or changes to growth rates are occurring and can effectively respond by targeting appropriate resourcing to impacted Government schools.</p> <p>DPIE is happy to support Council in the consultation and liaison through the implementation of the master planning program.</p>
Affordable Housing	<p>Council's LHS evidence base is considered sufficient to justify the preparation of a SEPP70 affordable housing contribution scheme. An LHS requirement of approval is included for Council to prepare a scheme that sets out delivery and rent models, tenant eligibility criteria, tenancy allocation, asset ownership and management.</p> <p>Notwithstanding potential issues related to development feasibility, the District Plan requires Council to prepare an affordable housing contribution scheme. The scheme would be prepared in advance of any out-of-sequence planning proposals and sends a critical signal to the market regarding Council's strategic planning intentions with regard to affordable housing provision. It will also commit Council to examining the feasibility of affordable housing contributions for all new proposals that are likely to result in an uplift of land value. If feasible and appropriate, affordable housing contributions would be required by LEP provisions that implement the contributions scheme. The scheme should be prepared in accordance with the <i>Greater Sydney Region Plan</i> key parameters for successful implementation of Affordable Rental Housing Targets and the NSW Government's <i>Guideline for Developing an Affordable Housing Contribution Scheme</i>.</p>
Seniors housing	<p>Council is encouraged to liaise with DPIE and continue to consider the inclusion of seniors housing provisions in its LEP that increase the supply of housing for seniors and people with a disability.</p>
Interdependencies with relevant local evidence base	<p>Incorporate the findings and outcomes of latest studies, policies and State-led precinct plans prepared since the publication and release of the LHS.</p>
Structure Plan	<p>Future iterations of the LHS should include a structure plan(s) that clearly identifies housing growth areas/precincts and their anticipated delivery over the short, medium- and longer-term horizons. Annotations to identify housing delivery and any key threshold assumptions should also be included.</p>
Data	
Clarification of 6-10 year target and 10-20 year housing forecast.	<p>Revisions to the LHS should provide a breakdown of how the 6-10 year target will be achieved, including when and where anticipated supply will be delivered and explain market take-up rates. LHS revisions will also need to include a revised housing delivery forecast for the 10-20 year period as new information becomes available.</p>



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	<p>Council should ensure that all population and dwelling forecasts are cross-checked against published DPIE projections to provide greater transparency. Additional guidance and support can be arranged with the Department's Evidence and Insights team to resolve any discrepancies in dwelling forecasts.</p> <p>Council should also consider the actions and timeframes identified in Council's LSPS and the GSC's letter of assurance.</p>