

30 April 2025

The Chair and Members
Wollondilly Shire Local Planning Panel
62-64 Menangle Street
Picton NSW 2571

Dear Chair and Members

Item 7.1 - Draft Planning Proposal for Land Adjoining Oakdale Sports Fields

Introduction

We refer to the above item on the agenda of the Wollondilly Local Planning Panel meeting of 1 May 2025 and provide the following submission for the Panel's consideration.

Why the planning proposal should be supported

The planning assessment report presents 3 options for consideration.

We urge the Wollondilly Panel to support the updated draft planning proposal (option 1), for the following reasons:

1. The planning proposal will help ensure sufficient housing is available to accommodate local growth. The Wollondilly Local Housing Strategy (2021) is based outdated population projections and an overestimation of the housing capacity of existing zoned land. This is not a criticism of the Strategy, which was of its time, but is evidence of the Minister's more recent assertion that *past strategic plans didn't anticipate or account for the scale of the housing crisis*.
2. The planning proposal secures the conservation of 5.7 hectares of ecologically valuable remnant bushland adjacent to a public recreation area. The bushland is currently zoned for rural primary production purposes.
3. The planning proposal provides a logical expansion of the Oakdale Village and the most appropriate means to accommodate future local housing demand without fragmenting the metropolitan rural area (MRA). This is consistent with the Western City District Plan which says that "*ongoing planning and management of rural towns and villages will need to respond to local demand for growth*."
4. Without additional housing, the population of the local area (the Oaks-Oakdale SA2) will decline by approximately 7% by 2041 as a result of changing household sizes. This will adversely affect the viability of existing shops, clubs, public transport and social infrastructure.
5. The planning proposal, and the proposed housing mix, will improve housing choice while complementing the area's village character by providing a mix of conventional and smaller lot sizes.
6. The staged delivery of new houses will coincide with the 2028 upgrade of the West Camden wastewater facility and is supported by existing road and social infrastructure.
7. The planning proposal provides significant public benefits for existing and future residents of Oakdale. It is accompanied by a planning agreement offer, informed by extensive consultation with Council officers and the Oakdale community, which includes:
 - New walking and cycling connections to existing social infrastructure.
 - Upgrade of Willis Park children's playground to cater for older children of all abilities.

- Upgrade of area immediately surrounding Willis Park children's playground and/or the Oakdale Community Hall for use as gathering and picnic areas.
- Upgrade to the existing tennis courts at the Oakdale Community Hall.
- New multipurpose court in the vacant space adjacent to the tennis courts at the Oakdale Community Hall. .
- Improve lighting at the Willis Park sports fields for evening training sessions.

Brief response to specific issues raised in assessment report

We provide the following brief response to specific issues raised in the staff assessment report.

The Wollondilly Local Housing Strategy clearly demonstrates there is sufficient capacity within existing zoned urban land to meet housing demand to 2041. (page 2)

This statement is not correct. The Wollondilly Local Housing Strategy (WLHS), finalised in January 2021, was prepared on the basis of the population projections available at the time, which were prepared in 2016. As a result, the WLHS underestimates the housing demand to 2041. Furthermore, the approval of the WLHS was subject to a number of conditions including a requirement that Council review and confirm the methodology used to identify additional dwelling capacity within the existing urban zoned areas of local centres/villages by March 2023 (see attached). This has not been done and as demonstrated in the planning proposal, the estimate of additional dwelling capacity was grossly overstated.

Wastewater servicing for the site. (page 2)

We note that Sydney Water raised no concerns regarding servicing in their response during preliminary notification of the proposal, stating that: *"Sydney Water understands and supports the proponent's intent to connect to Sydney Water's wastewater network circa 2028"*

Nonetheless, we have revised the draft Planning Proposal by indicating that the site should be designated an Urban Release Area in Wollondilly LEP 2011, thereby making it subject to Clause 6.2(1) of the LEP, which states: *Development consent must not be granted for development on land in an urban release area unless the Council is satisfied that any public utility infrastructure that is essential for the proposed development is available or that adequate arrangements have been made to make that infrastructure available when it is required.*

Ownership and long-term management of the C2 Environmental Conservation Zone. (page 2)

The ecologist for the draft Planning Proposal has discussed this issue with Council's Environmental Planner who agreed that public ownership is an appropriate option to facilitate the long-term management of land to be zoned C2 Environmental Conservation. The land would be rehabilitated by the proponent and managed for an agreed period before being dedicated in accordance with Council's Dedication of Land Policy.

We note that the area of land proposed for dedication to Council is too small to be suitable as a Biodiversity Stewardship Site under the NSW *Biodiversity Conservation Act 2016*.

Other options that were considered for the proposed C2 land included:

- Making the land community association land as part of a community title residential subdivision, and
- Private ownership in a large lot/lots that would also include a dwelling entitlement

Neither of these alternative options were considered to provide adequate long-term protection of the land's biodiversity values.

Voluntary planning agreement. (page 3)

A formal voluntary planning agreement (VPA) has not been lodged however the draft Planning Proposal was accompanied by a VPA offer including specific works based on discussion with Council officers. We considered it premature to draft a planning agreement until such time as a Gateway Determination is issued.

Wollondilly 2040 Local Strategic Planning Statement. (page 11-14)

The assessment report omits any discussion of Planning Priority 8 and the Oakdale 'snapshot'.

Planning Priority 8 addresses *Enhancing vibrant, healthy and sustainable local towns and villages*.

The plan notes that "housing growth in the Metropolitan Rural Area is more likely to occur through redevelopment or development in existing urban areas rather than through rezoning.", noting again that the LHS overestimates the capacity of existing zoned land.

We submit, however, that rezoning is the only realistic option for accommodating local growth in and around Oakdale. Moreover, our analysis shows that additional housing is required to ensure that villages such as Oakdale maintain and improve vibrancy, healthiness and sustainability for the simple fact that the population will decline without new housing opportunities due to the aging population and declining household sizes.

The village snapshot for Oakdale states that the community's values and needs include new walking and cycling connections, protection of the natural setting and improvements to public and green spaces – all of which would be provided via the planning agreement offer provided with the draft Planning Proposal.

Other issues or statements raised in this part of the assessment report warranting a response include:

Proper consideration for roads, parks, and community facilities (page 11)

Our traffic analysis and feedback from Transport for NSW confirms the draft Planning Proposal will have a negligible impact on the capacity of local roads and intersections.

The proposal represents an opportunity to secure upgrades to local recreational and pedestrian facilities including the provision of shared pathways through a voluntary planning agreement.

Strain on existing services and infrastructure, including schools (page 11)

The Council officer's report suggests that the draft planning proposal represents unplanned growth which will place "added strain on existing services and infrastructure, including schools and recreational facilities, many of which are already operating at or near capacity".

On the contrary, our research shows that additional housing will help maintain the viability of existing services and social infrastructure – particularly local medical services, sporting clubs and the DA-approved childcare facility. Oakdale Public School has ample space for the modest increase in enrolments that could be expected to come from the proposed housing, while the feeder high school, Camden High, has experienced declining enrolment numbers over the past 5 years.

Rural lands, and local towns and villages are well valued and must be protected in the context of unprecedented growth. (page 11)

Despite the site's existing RU1 Primary Production land use zoning, it does not support any primary production activities, nor is it likely to do so in the future.

From a scenic perspective, the majority of the site is not visible from any public vantage points, hence it's development would not have a significant impact on the character of the village -and not more so than recent low density residential subdivisions on the northern side of the village.

The proposal does not have the potential to create the structure for a more compact and connected city (page 12)

The intention of the draft Planning Proposal is to provide for approximately 40% of the future growth in the local area so that future households are not forced to move out of the local area. Without diminishing the importance of planning for housing choice and diversity, the proposal represents only 0.05% of the housing required in the Sydney metropolitan area. The site is within a walkable catchment of existing services including shops, the local public school and sporting facilities and will support the ongoing viability of those services and facilities.

The Housing Demand Analysis has not been peer reviewed (page 13)

Our housing demand analysis was lodged with our original planning proposal, accepted by Council on 31 May 2024. We supplied an amended version of the analysis on 28 March 2025 to reflect a further update to the NSW Government population projections. The NSW Government population projections are peer reviewed and are the basis of our analysis. Our analysis does not use rely on any data that has not been peer reviewed.

The proposal does not provide the opportunity to enhance the values of the MRA in contributing to habitat, biodiversity, supporting productive agriculture. (page 13)

As already outlined, the site does not support productive agriculture and is unlikely to do so in the future – for reasons outlined in advice obtained from an agricultural economist which accompanies the draft Planning Proposal. Neither would its development have an adverse impact on existing agricultural activities.

The draft Planning Proposal provides zoning and a suitable proposed mechanism for the rehabilitation and long-term management of biodiversity values within the site.

Planning priority 18: “Living with climate impacts and contributing to the broader resilience of Greater Sydney” prevents Council from considering planning proposals for local growth prior to the development of an appropriate management approach to natural and manmade hazards. (page 13-14)

The draft Planning Proposal has had regard to Council’s draft Wollondilly Hazard Analysis and Emergency Management Strategy (HAEMS), in particular the Stage 3 report focussing on hazard mitigation assessment.

Nattai and Oakdale is one of 7 population centres assessed by the HAEMS in relation to its bushfire evacuation capability. Even without mitigation measures, Nattai and Oakdale had an estimated evacuation timeframe based on the projected 2040 population of 1 hour, which compared favourably to all other population centres. The development envisaged in the draft Planning proposal will not lead to a significant increase in dwellings that would require evacuation in a bushfire event.

Flooding has been considered in detail and the potential requirement for an overland flow path near the site’s Burragorang Road frontage can be readily incorporated into the concept subdivision of the site.

Conclusion

We look forward to the opportunity to present to the Panel and assisting with any questions.

Yours sincerely



Stephen Kerr
Executive Director

Attachment:

- Wollondilly Local Housing Strategy Letter of Approval

Mr Ben Taylor
Chief Executive Officer
Wollondilly Shire Council
PO Box 21
Picton, NSW 2571

Dear Mr Taylor

Wollondilly Shire Council Local Housing Strategy

Thank you for submitting Wollondilly Shire Council's Local Housing Strategy (LHS) to the Department.

The Department commends Council on preparing a robust evidence base to support its LHS, providing Council with a clear understanding of the housing needs of the Wollondilly Shire local government area (LGA) and a strong commitment to strategic planning.

I can confirm that I have determined to approve Wollondilly Council's LHS adopted by Council on 16 March 2021. My decision reflects the analysis undertaken to develop a comprehensive strategic planning and an evidence base to inform your LHS and to deliver the housing target of between 1,800 – 2,300 as set by Greater Sydney Commission (GSC) for the period 2021-26.

In doing so, I have determined that:

- The LHS addresses housing supply and has demonstrated that sufficient supply can be delivered predominantly through the current pipeline and existing capacity to meet the projected population growth during the 6-10 year period.
- The Department is satisfied that Council has a solid foundation from which secure sound housing diversity and affordability outcomes, subject to the requirements of approval.
- The LHS is not inconsistent with Section 9.1 Directions and SEPPs.
- The LHS is consistent with the Western City District Plan, subject to the requirements identified below and demonstrates good alignment with the Wollondilly Local Strategic Planning Statement (LSPS).

My approval is subject to the following requirements:

1. Council is to commit to a 6-10 year target for the period 2021/2026 of 1,800 to 2,300 dwellings target outlined in the GSC letter of assurance for Council's LSPS. This should be reflected in any further updates to the LHS.

2. Within six (6) months of Council receiving LHS approval, Council is to prepare and submit to DPIE a prioritised Implementation and Delivery Plan that clearly articulates the actions, capacity, roles and responsibilities and timing to facilitate housing supply, diversity and affordability between 2021 and 2026 and a broader program of 10 years plus.

The Plan should be prepared in consultation with DPIE, TfNSW, Sydney Water and the Western Sydney Planning Partnership, to ensure any critical interdependencies are satisfactorily resolved. As per the LHS, implementation priority should be given to the identified growth areas including the Greater Macarthur Growth Area.

In undertaking this work, Council is to review and confirm the methodology used to identify additional dwelling capacity within the existing urban zoned areas of local centres/villages, (outside of the Wilton and Greater Macarthur Growth Areas) having regard to natural constraints, infrastructure requirements and likely dwelling yields.

3. Council is to include new actions in the Implementation and Delivery Plan which:
 - a) Reflect the commencement and progression of land use changes and other appropriate controls through the LEP and DCP as per Section 2.7.3 of the LHS for Tahmoor, Picton and Thirlmere to ensure housing diversity outcomes are achieved and align with the actions and priorities of the MRA;
 - b) Reflect and include the outcome of the Wilton Town Centre planning proposal as well as the outcome of the TAP pilot program for Appin/North Appin, as this relates to the Wollondilly Local Government Area.
 - c) Establish the framework for managing housing across the Metropolitan Rural Area (MRA), including the recommendations of the Rural Lands Strategy when finalised.

The new actions should also be included in future iterations of the LHS.

4. Council is to finalise the Hazards Analysis and Emergency Management Study by the end of 2022 and subsequently progress with implementation of the study's recommendations.

Based on the targeted recommendations from this study, Council is to aim to progress planning for:

- a) the existing centres of Tahmoor, Thirlmere and Picton that will deliver housing diversity related actions that are able to be implemented through the LEP and DCP where this aligns with the actions and priorities of protecting the Metropolitan Rural Area (MRA). It is noted that priority has been given Picton Place Strategy by Council;
- b) non-standard dwellings (seniors housing, boarding houses, group homes etc) as part of future stages of the Wilton Growth Area.

5. Council's LHS should be revised and updated shortly after the strategic planning directions and infrastructure strategy are determined for the Greater Macarthur Growth Area precincts of Appin and/or North Appin, as this relates to the Wollondilly LGA. The revised LHS is to reflect, give regard to and support implementation of these directions. Council's Implementation Plan should also be updated to reflect actions for Council to progress and set directions for these precincts.
6. Future iterations of the LHS are to be informed by detailed land use opportunities, constraints analysis and mapping to confirm medium and long term housing opportunities. This should:
 - a) be contextualised having regard to the Greater Sydney Region Plan (as current), Western City District Plan (as current), the Wollondilly LSPS (including any updates), Future Transport 2056, Greater Macarthur 2040 Interim Plan (as revised), delivered infrastructure reinvestments and the outcomes of the Hawkesbury Nepean Flood Study;
 - b) be undertaken in collaboration with relevant stakeholders, including DPIE, TfNSW, Resilience NSW, Infrastructure NSW, the State Emergency Service, Rural Fire Service and Sydney Water;
 - c) clearly articulate existing and future opportunities and constraints particularly when considering infrastructure provision;
 - d) proactively identify Council and State Government-owned sites that may be suitable for redevelopment, and particularly deliver affordable housing outcomes (in consultation with the identified landowners).
7. Future iterations of the LHS and planning proposals should be informed, or continued to be informed, by any supporting studies/investigations, such as Council's Rural Lands Strategy, The Centres Strategy, the Social Planning Strategy and the Wollondilly Hazards Analysis and Emergency Management Study. The future LHS as revised should also be informed by the planning and infrastructure outcomes and directions set by the Department's TAP pilot program for Appin/North Appin, as relevant to the Wollondilly LGA.
8. Future iterations of the LHS should clearly articulate the endorsed objectives, inter-relationship and any relevant actions by either cross referencing the Rural Lands Strategy or adopting key housing actions from the Rural Lands Strategy into the LHS. If there are any inconsistencies with the final Rural Lands Strategy or this approval or the Council's LHS, the terms of this approval are to prevail.
9. The Department supports the Council's draft Rural Lands Strategy Action 6.1 to not rezone any further land outside the existing village footprints for further residential purposes unless:
 - It is compatible with the Metropolitan Rural Area as identified in the Greater Sydney Region Plan;
 - It is consistent with Council's Agricultural Viability Study recommendations (once the study is completed);
 - An infrastructure strategy can be implemented to support further development;

- It is consistent with the Council's Hazards Analysis and Emergency Management Study recommendations (once the study is completed); and
 - Council has consulted GSC on any potential inconsistencies with the District Plan (as current).
10. Council is to prepare an AHCS that commits Council to examining the feasibility of levying affordable housing contributions for any new planning proposals that would result in development uplift or an increase in land value. This will ensure that planning proposals give effect to Action 18 of the Western City District Plan. The LHS can also be amended to include an Action for Council to consider the outcomes or use the Western Sydney Housing Affordability Strategy when finalised.
 11. 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 the housing diversity and affordability outcomes delivered. A monitoring and review system will ensure that appropriate mechanisms can be identified and implemented to meet Council's housing needs. Council may wish to link this with the Department's Housing Evidence and Insights division.
 12. Council is to prepare principles for assessing proponent-initiated requests for planning proposals for residential or rural residential development, including out-of-sequence criteria to consider any additional opportunities for growth that are not identified in its LHS, or for urban renewal opportunities.
 13. The direction and strategic planning approaches endorsed in any State-led strategies or plans are to prevail in the event of any inconsistency with this approval and/or the Council's LHS (as revised and current).
 14. Council is to update or revise the LHS to inform Council's updates/revision to its LSPS following the making of a future District Plan.

Any planning proposals for new housing development will be assessed against the Wollondilly Shire 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 LHS.

Local Housing Strategy Reviews and Updates


We strongly recommend that Council 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.

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.

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 Planning Portal alongside the letter of approval and advisory notes.

Should you have any further questions, please contact Dominic Stefan, Specialist Planner on 02 8275 1024.

Yours sincerely



Amanda Harvey
Executive Director: Local Strategies and Plan Making

9 September 2021

Encl: Advisory Notes



Wollondilly 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 and Delivery Plan with a priority work program, clearly defined roles and actions, capacity and potential yield, responsibilities and definitive timeframes with risks and dependencies identified. The Plan should be prepared in consultation with the Department, Transport for NSW (TfNSW) and the Western Sydney Planning Partnership, 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 the LHS Actions, including:-</p> <ul style="list-style-type: none">• confirmation which Place Plans Council would be progressing, their intended outcomes and timeframes• outcomes associated with Wilton growth area, and in particular the Wilton town centre.• recognising any outcomes or potential dwelling capacity arising from the Greater Macarthur Growth Area (Technical Assurance Panel (TAP) pilot program related to Picton and Appin/North Appin.
Review and monitoring framework	<p>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 Local Strategic Planning Statement (LSPS).</p> <p>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.</p>
Infrastructure	<p>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</p>

Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	<p>services. Council is encouraged to cross reference any endorsed Council strategies and plans, where relevant, and collaborate with the Department and other State agencies (and in particular School 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.</p> <p>The Productivity Commission's Recommendation 4.1 encourages Council to concurrently exhibit future planning proposals with new or updated contribution plans. This should be considered as part of housing in the future.</p>
Making appropriate provision for any additional housing opportunities that may arise out of sequence	<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
Community and Stakeholder Engagement	<p>Incorporate the findings of any future relevant community and stakeholder engagement.</p>
Consultation and engagement with agencies	<p>Council should continue consultation with the following agencies:</p> <ul style="list-style-type: none"> • TfNSW in relation to planning for city-shaping and city-serving transport initiatives in Future Transport 2056 and alignment with Council-led transport infrastructure initiatives. • 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; ○ When Council is aware of variations in the following:

Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	<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. <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> <ul style="list-style-type: none"> • The Department in relation to: <ul style="list-style-type: none"> ○ potential opportunities to unlock barriers posed by the challenges of land fragmentation and its impact on the expected levels of housing delivery; ○ Council's Rural Lands Strategy regarding the need for approval to inform LEP updates.
Affordable Housing	<p>Council's LHS evidence base is considered sufficient to justify the preparation of a SEPP70 Affordable Housing Contribution Scheme (AHCS). An LHS requirement of approval is included for Council to prepare an AHCS that sets out delivery and rent models, tenant eligibility criteria, tenancy allocation, asset ownership and management. Notwithstanding potential issues related to development feasibility, Action 18 of the Western City District Plan requires Council to prepare an AHCS. The AHCS 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> <p>Council should 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 AHCS.</p>
Seniors housing and need for housing diversity	<p>Council is encouraged to investigate the inclusion of seniors housing provisions in its LEP that increase the supply of housing for seniors and people with a disability.</p>

Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	<p>Council is encouraged to manage and expedite planning proposal processes, particularly where they will secure diversity and affordability outcomes and in particular support key cohorts such as seniors housing, affordable housing and other typologies that suit the changing needs of existing and future households in identified investigation areas. Future iterations of the LHS could be substantially strengthened through the inclusion of a finer grain analysis of population cohorts, housing supply and demand by typology to determine future implications.</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, including but not limited to:</p> <ul style="list-style-type: none"> • Rural Lands Strategy • Centres Strategy • Social Planning Strategy • Wollondilly Hazards Analysis and Emergency Management Study (once completed) • Wollondilly Shire Wide Flood Study (once completed) • Western City Affordable Housing Strategy, and • Sydney Water Growth Servicing Plan 2020-2025 (recently updated).
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 likely yield ranges 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> <p>Council should ensure that all population and dwelling forecasts are cross-checked against published Department 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>Future iterations of the LHS be required to give due consideration to housing needs based on the LGA's future household composition in the context of existing, committed and planned infrastructure investment, as well as key State government programs (such as Wilton and Greater Macarthur 2040 Interim Plan).</p>