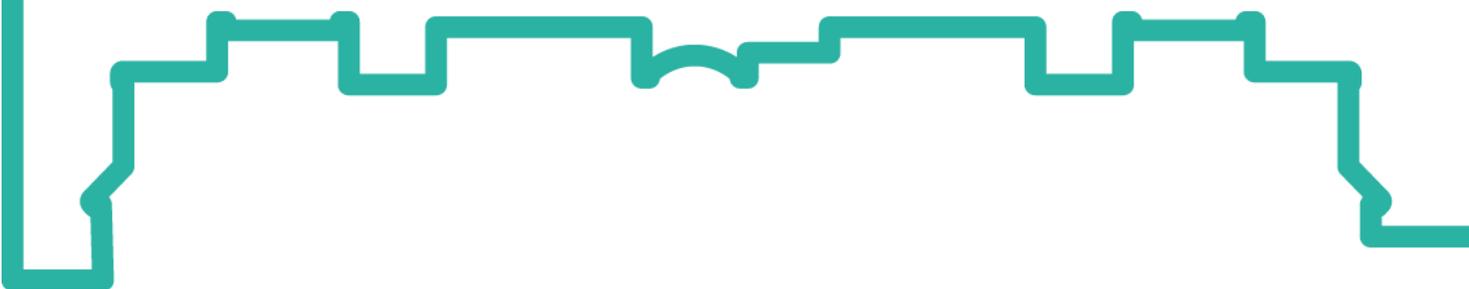




SHELTER NSW SUBMISSION

Public Exhibition of the Burwood North Precinct Masterplan & Affordable Housing Policy and Contributions Scheme

07 December 2022



About Shelter NSW

Founded in 1975, Shelter NSW is a non-profit organisation that is concerned about the housing crisis in NSW and the rising trends of homelessness, housing rental stress as well as impacts of poor-quality housing, particularly on low-income households.

Shelter NSW conducts housing research and advocacy on housing reforms, representing a diverse range of household types that aim to plan for equitable growth to benefit our economy, society and environment.

Shelter NSW is a member-based organisation engaging our members, experts and partners that represents a diverse network of other organisations and individuals who share and can advance a vision of a sustainable housing system that provides a secure home for all.

We have previously commented on a number of Burwood Council strategic plans including the Draft Local Strategic Planning Statement (2019)¹ and on the Parramatta Road Corridor Urban Transformation Strategy (2021)².

Executive Summary

Shelter NSW welcomes the opportunity offered to the community by Council, to contribute ideas for the Burwood North Masterplan precinct (Masterplan), which will set the vision, strategic direction and planning framework for the Burwood North Precinct.

While Shelter NSW support Burwood Council's vision for future growth that is well planned, sustainable and meets the changing needs of our community, this submission mainly focuses on affordable rental housing incentives for lower-income households and essential workers.

In particular, Shelter NSW acknowledge the current iteration of the Masterplan aims to gather community ideas to help develop a Planning Proposal for the comprehensive LEP review of Burwood Local Environmental Plan 2012 (BLEP 2012). It is understood this legislative reform is structured around the revitalisation of the 17 hectare Masterplan site, with a diverse mix of land uses, integration of the Burwood North Metro Station and the Burwood Town Centre³.

Shelter NSW acknowledges the siting of the Sydney Metro West train station (due to open in 2030), will link the Precinct to existing and emerging industry and employment in the Sydney CBD and Parramatta CBD and that the majority of the Masterplan's new housing will be delivered through urban renewal of the Burwood Concord Precinct³.

Importantly, with 5,500 new homes delivered by 2050 and an additional population of 11,400 to 2036, the Masterplan is expected to significantly alter density and affordable rental housing outcomes for the Precinct and wider Burwood LGA³.

Therefore, the early engagement is a prime opportunity to ensure any development of Burwood North Masterplan Precinct delivers on affordable rental housing outcomes for those households on average incomes and particularly for those lower than average income households in the private rental market of Burwood identified in the Council's Local Housing Strategy in 2020⁴

The creation of an Affordable Housing Contribution Scheme (AHCS) is critical to the delivery of affordable rental housing in this precinct and the wider LGA. Shelter NSW welcomes the comprehensive review of the BLEP 2012 to introduce affordable rental housing clauses as a first of its kind for the Burwood LGA.

Specifically, the increase in density envisaged by the Masterplan acts as an opportunity for additional approaches to incentivise the achievement of 10% (minimum) affordable rental housing targets consistent with locations within 800m of a strategic centre or transport hub as described in the latest iteration by the Greater Cities Commission (September 2022) for City Plans within The Six Cities Region⁵.

Burwood North Precinct Masterplan vision outcomes and core planning principles

Shelter NSW welcomes the opportunity to engage early on the creation of a sustainable residential precinct with a focus on Affordable Rental Housing prior to finalising the Planning Proposal for a comprehensive Affordable Rental Housing Implementation Plan within the Burwood North Masterplan precinct and across the wider LGA.

We wish to reiterate what we understand to be the identified core planning principles for the Burwood North Precinct as per Council's comprehensive review of the Burwood LEP (Council meeting, 26 April 2022)⁶ as:

- It is understood the 17-hectare Burwood North Masterplan Precinct is the location of the Sydney Metro West Train Station and draws on the positive benefits from a rail stop and the Burwood Town Centre to deliver on design excellence, place creation, economic growth and importantly provide for Affordable Rental Housing outcomes.
- Shelter NSW notes the Masterplan renewal area forms part of the wider Burwood-Concord Precinct shared between City of Canada Bay and Burwood Councils. Importantly for Burwood Council, City of Canada Bay Council has had an LGA wide Affordable Housing Scheme since 2016. Shelter NSW see the collaborative council work over this shared renewal area as a significant opportunity for Burwood Council to introduce a levy for affordable rental housing associated with the expected increase land value uplift within the Masterplan Precinct. Outcomes include the introduction of affordable rental housing clauses linked with inclusionary zoning for both residential and employment generating uses and the delivery of affordable dwellings in perpetuity (registered on title) at nominated locations where density can be done well.

- Setting a target of 5% (minimum) of new housing for affordable rental housing for low and very low income earners associated with the potential increase in density and land value uplift as part of the current iteration of the Masterplan Precinct for new residents of this renewal site is subject to its commercial viability.
- The 5% (minimum) affordable rental housing target is consistent with the 5% affordable rental housing mandated by Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) for the Burwood North Masterplan Precinct.
- Over 5,000 new jobs are to be concentrated within the town centre location.
- Council is aiming to create a sustainable residential precinct that provides a variety of densities and scale subject to amenity based controls that promote and exhibit design excellence in its built form and human scale design at street level. It is also seeking to activate streets and to use best practice in environmental sustainability measures and practices that contribute to the character of a well-designed coherent town centre.
- The aim is an enhanced public domain network that maximises connectivity and useability of public open space, promotes permeability and walkability, cohesion and engagement in an inclusive destination for all of its community within the Precinct.
- Opportunities to grow and expand the night time economy.
- The noted need for investigation into flood, contamination, and infrastructure constraints to development capacity within the Precinct.
- An anticipated early 2023 timeframe for Council to endorse the Planning Proposal for the comprehensive review for the Burwood LEP 2012 which will not only focus on a City Excellence Strategy and importantly will introduce an LGA wide Affordable Rental Housing Policy and Contribution Scheme.

Key findings and Recommended Actions

(To progress applying Affordable Rental Housing Targets within the Masterplan)

Shelter NSW welcomes Council's announcement of the comprehensive review of the BLEP 2012 to introduce affordable rental housing clauses as a first of its kind for Burwood Council. Shelter NSW notes the Masterplan's acknowledgement for concentrated residential growth in Burwood North Masterplan Precinct of upwards of 11,000 residents by 2050 housed in more than 5,000 new dwellings³.

The increase in density acts as an opportunity for additional approaches to incentivise the achievement of 10% (minimum) affordable rental housing targets consistent with locations

within 800m of a strategic centre or transport hub described in the latest iteration by the Greater Sydney Commission (September 2022) for City Plans within The Six Cities Region⁵.

Shelter NSW recommends various LEP related Affordable Dwelling Option levers for the localised potential for Affordable Rental Housing within the Burwood North Precinct and broader LGA as follows:

- An affordable housing target of 10% (minimum) should occur as an explicit amendment to the LEP planning controls so that the increased land value from redevelopment be linked to an affordable rental housing contribution scheme, commensurate with the 10% affordable housing target on housing supply, diversity and affordability for the City Plans of the Six Cities Region by the Greater Cities Commission (GCC) (announced in the GCC Discussion Paper of September 2022). The City Plans specifically aim to progress inclusive places linked to infrastructure adjacent to the roll out of fast rail and metro stations⁵.
- Affordable rental dwelling clauses within the amended Burwood LEP 2012 should be for dwellings in perpetuity (registered on title).
- Nominated locations need to be considered where height and FSR could be reviewed for commercial feasibility of the required density (subject to a caveat of density done well).
- Council should apply an Affordable Housing Contribution Rate to both residential and non-residential land uses (inclusionary zoning) to increase the viability of deriving a public benefit for affordable rental housing across the entire precinct undergoing redevelopment. City of Sydney is leading this by example. It applies a sliding contribution rate between 3% for residential land use compared to 1% of the total non-residential land uses to be broadly viable. An employment only zoning will likely lead to no contribution for affordable rental housing from densification of employment uses.
(https://www.cityofsydney.nsw.gov.au/-/media/corporate/files/publications/affordable-housing-contributions/city-of-sydney-affordable-housing-program/city-of-sydney-affordable-housing-program_24-august-2020_final.pdf?download=true)
- Assessing viability of affordable housing at the nominated sites where an affordable rental housing rate could be increased over time rather than a fixed rate applied to the whole precinct (Canada Bay is leading in this area by example).
([https://www.canadabay.nsw.gov.au/sites/default/files/2021-11/Revised%20AHCS_incl%20RW_AdpJun21_EffOct21_percentage%20clarified\(updated%206.11.2021\).pdf](https://www.canadabay.nsw.gov.au/sites/default/files/2021-11/Revised%20AHCS_incl%20RW_AdpJun21_EffOct21_percentage%20clarified(updated%206.11.2021).pdf))
This approach may provide greater flexibility and scope to deliver Affordable Rental Housing where noted potential exists and help to compensate for those sites constrained due to significant value in existing improvements, low development value for non-residential uses, fragmentation of sites, heritage considerations where there are limitations from adjustments to built form requirements.
- Align proportionate delivery commitment of Affordable Rental Housing to the broader timing of redevelopment capacity in the short, medium and longer term across all parts of the 17 hectare Masterplan precinct.

- As an interim measure Council adopt an affordable housing clause in its “Planning Agreement” framework (Voluntary Planning Agreements) to allow Council to acquire a community contribution in the form of affordable housing on any major development site until the BLEP 2012 is amended to incorporate affordable housing clauses. Two best practice planning agreement examples include Randwick & Canterbury Bankstown’s Planning Agreement Policy.
- Council to monitor the desired outcome of any renewal project to ensure developments deliver affordable rental dwellings in perpetuity. A reportable definition of affordable rental housing can help to monitor actual affordable rental dwellings delivered upon construction.
- Encourage the provision of seniors housing within the future town centre as an opportunity to support older residents to age in place. Shelter NSW would encourage the Council to adopt guidelines to increase the provision of adaptable and accessible dwellings in line with universal housing design principles (<http://universaldesign.ie/What-is-Universal-Design/Definition-and-Overview>).
- Explore the opportunity to secure additional social and community housing within the Burwood North precinct (target 5% of new dwellings) to keep pace with the population growth and resolve the current and growing unmet need for social housing across the LGA.

Thank you for reviewing our submission

Shelter NSW appreciates the opportunity to comment on the early engagement of the Burwood North Masterplan Precinct (November 2022). We hope that the comments and insights we have provided will bring application value to realising Affordable Housing within the future precinct and wider LGA.

If you wish to discuss our submission in more detail , please contact Pilar Aberasturi on 0450 554 659 or by email at pilar@shelternsw.org.au.

Sincerely Yours,

Sincerely Yours,

CEO, Shelter NSW

Policy Officer, Shelter NSW

John Engeler

Pilar Aberasturi

1. https://shelternsw.org.au/wp-content/uploads/2020/11/Burwood_-_LSPS_Shelter_NSW_Submission.pdf
2. <https://shelternsw.org.au/?s=parramatta+Road+Corridor+Urban+Transformation+Strategy>
3. (Item 13/22) *Comprehensive Review of Burwood Local Environmental Plan* report by Director of City Strategy, (Council meeting, 26 April 2022).
4. [Burwood-Local-Housing-Strategy-endorsed-by-Council-on-11.02.2020.pdf](#)
5. Housing Supply Diversity and affordability, Greater Cities Commission, September 2022 (<https://greatercities.au/six-cities-region/housing>)