

Shelter NSW submission on *Draft Burwood North Precinct Masterplan* – (Jan 2024)

A secure home for all

5 January 2024



About Shelter NSW

Shelter NSW has been operating since 1975 as the State's peak housing policy and advocacy body. Our vision is to create a sustainable housing system that provides secure homes for all. We provide systemic advocacy and advice on policy and legislation for the whole NSW housing system to resolve housing inequality.

We are especially concerned for low-income households which struggle to afford good quality and well-located housing in the private market. We consider a sustainable housing system one that delivers what we call Triple-A housing and Triple-P outcomes:

Affordable and diverse homes	Accessible, well-located housing	Appropriate, high-quality development
Housing supply and demand	Proximity to jobs and services	Amenity and aesthetics
Tenure forms and rights	Access to public transport	Energy and environment
Housing types and sizes	Accessibility and adaptability	Standards and maintenance
Productive cities and regions	Poverty-free communities	Protected neighbourhoods
Access to jobs and services	Housing stress and homelessness	Energy use and consumption
Housing costs and consumption	Physical and mental health	Urban heat
Financial and economic stability	Education access and attainment	Climate resilience and adaptation

At Shelter NSW we believe that growth should be fair and inclusive – improving the life of all people. A substantial expansion of the social housing dwellings in NSW over the next decade will build a solid asset base for the state; restore the social housing safety net of 5% of all housing stock and work towards 10% of all stock by 2040 (2050 at the latest). Stock of this size would create a meaningful alternative to the private rental sector, in terms of affordability, accessibility, amenity and security; provide a more efficient response to homelessness and represent a significant platform of physical, community and social infrastructure for NSW as it grows.

Finally, we are strong advocates for Affordable Housing in **addition to** social housing, not instead of it. Affordable Housing in the NSW Planning system is housing eligible to very low, low, moderate income households, where they must not pay more than 30% of their gross income on rent¹.

Our policy and advocacy platform² also calls for the planning system to systemically deliver a dramatically increased number of Affordable Rental Dwellings for lower income people including essential and key workers. Shelter NSW routinely advocates for 10-15% affordable housing target for all rezonings where there will be a housing uplift;

¹ s1.4 of Environmental Planning & Assessment Act 1979; cl. 13 of State Environmental Planning Policy (Housing) 2021

² [221206_Shelter-NSW-2023-State-Election-platform.pdf \(shelternsw.org.au\)](#)

1. About our submission

Shelter NSW (Shelter) welcomes and appreciates the opportunity to comment on the Draft Burwood North Precinct Masterplan recommendations for a draft implementation (planning) strategy for urban renewal which was on public exhibition until 15 December 2023⁵. We note public submissions will be accepted up to 5 January 2024.

Shelter acknowledges the Burwood North Precinct Masterplan has progressed from earlier engagement with the community in late 2022 to which it made a submission⁶.

Shelter NSW is supportive of Burwood Council for having undertaken a strategic plan for a new precinct that is generally aligned with what Shelter has called for in its work with other similar policy bodies, such as PIA (Planning Institute of Australia) on Inclusive Renewal⁵.

Shelter NSW's submission primarily concerns itself with an assessment of the intent and merits of the Burwood North Masterplan, including ensuring that 5% affordable housing provision is as effective in its capacity to generate affordable housing as the announced affordable housing incentives tied to comparable accelerated renewal of metro and rail stations⁶ to tackle the housing crisis in Sydney, made in December (2023).

Any decision taken on development contributions through Burwood's LEP (Local Environmental Plan) reform for affordable housing provision needs to reflect consistent governance over the shared ability to supercharge housing supply⁷ whether by delivery of the Burwood North metro or Sydney transport hubs⁸ as this has direct impacts for those lower income (rental) households in the private rental market. Other observations relate to 'build to rent' developments, social housing and urban design outcomes for the renewal precinct.

⁵ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from: [https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood North Masterplan Draft Masterplan Report reduced stamp ed.PDF](https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood%20North%20Masterplan%20Draft%20Masterplan%20Report%20reduced%20stamp%20ed.PDF)

⁶ Shelter NSW Submission. (December 2022). Public exhibition of the Burwood North Precinct Masterplan & Affordable Housing Policy and Contributions Scheme. Retrieved from: https://shelternsw.org.au/wp-content/uploads/2022/12/221209_Burwood-North-Masterplan-Precinct-Early-Engagement-Submission_PA.pdf

⁵ Planning Institute Australia, Density Better Media Release September 2023. Retrieved from: [PIA-Shelter-Density-Better-Media-Release-4-Sept-final.pdf \(shelternsw.org.au\)](https://shelternsw.org.au/wp-content/uploads/2023/09/Density-Better-Media-Release-4-Sept-final.pdf).

⁶ NSW Government (7 December 2023). A Shared Responsibility: The plan to begin addressing the housing crisis in NSW media release. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>

⁷ ibid

⁸ ibid

2. Executive Summary

Shelter NSW welcomes the opportunity to comment on the draft implementation strategy (planning framework) of the publicly exhibited Burwood North Masterplan precinct plan as the vision for future growth in Burwood North over the next 15 – 20 years⁹ (**Figure 1**).

A key feature of the draft implementation strategy, associated with the Burwood North Precinct Masterplan, is to focus higher density living for 11, 000 new residents in proximity of the future Burwood North metro station (opening 2030)¹⁰. Importantly, when fully redeveloped, the intention of the draft Masterplan is to build 5,366 additional dwellings (6.5 times the number of existing dwellings as 823)¹¹ to assist with meeting NSW Government housing targets¹². Shelter notes opportunities for up to 5% affordable housing and build to rent options¹³ will accompany the new housing supply. Employment generating redevelopment opportunities are also envisioned with over 1,000 essential worker jobs to be created within the renewal precinct¹⁴.

This submission concerns itself with an assessment of the merits of the draft implementation strategy to the renewal precinct, as it relates to what is often termed “Capital A” Affordable Rental Housing, as a specific programmatic response to housing affordability. An important focus of this submission is how Council’s vision to deliver opportunities for affordable housing will have direct impacts for the 47%¹⁵ of renters in the Burwood private rental market, of which 38.5% pay more than 30% of their gross household income on rent¹⁶.

Shelter welcomes Council’s intention to acquire a percentage of total floor space ratio (FSR) as an effective way to introduce affordable housing outcomes through the planning system¹⁷ from redevelopment of the precinct, in recognition affordable housing is critical for lower income tenanted households, especially for the lowest 40% of income earners in Burwood, including essential workers.

⁹ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from: https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp.ed.PDF

¹¹ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from: https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp.ed.PDF

¹² ibid

¹³ ibid

¹⁴ ibid

¹⁵ ABS Quick Stats Burwood (2021). Retrieved from: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/LGA11300>

¹⁶ ABS Quick Stats Burwood (2021). Retrieved from: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/LGA11300>

¹⁷ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from: https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp.ed.PDF

At the same time, following on from the NSW Premier’s announcements over tackling the housing crisis¹⁸, Shelter recognises a need for Council to provide a clearer understanding of a minimum expectation to implement appropriate affordable housing growth tied to accelerated renewal around Burwood North metro. It also compels Council to create a strong legal planning framework for the operation and management of an affordable housing scheme that validates the significant contribution from Burwood North’s accelerated renewal to deliver thousands of homes which underpin the metro alignment, a key focus expected from fast rezoning of Sydney rail and metro stations¹⁹.

Such an action is also expected to have far-reaching effects for the high number of renters in Burwood, where declining housing affordability issues extend across 9 of 10 household types (**Table 1, Appendix A**). This is especially important as Burwood Council does not currently have a planning mechanism in place to acquire or draw affordable housing contributions within the local government area (LGA) to generate affordable rental housing (**Table 2, Appendix B**).

Main Recommendations

The main intention of Shelter NSW’s submission is to highlight where removal of real or perceived barriers to create better planning outcomes than are currently envisaged, with Council acting through LEP reform to:

- a) secure a minimum level of consistency in developer contributions across all Sydney metro and rail stations undergoing accelerated renewal²⁰ including Burwood North.

This action entails transparently evaluating affordable housing provision announced by the NSW Government for up to 15% of all homes generated by renewal²¹ compared to a minimum of 5% of total FSR proposed by Council. Any additional affordable housing incentive captured, which could maximise access by those most in need including essential workers to live and work at the very heart of the renewal precinct, will require levying through the proposed Affordable Housing Contribution Scheme (AHCS).

- b) ensure any affordable (rental) housing stock generated is held in perpetuity (rather than a time limited period)
- c) deliver affordable housing on site, pro-rata and incrementally, in line with the indicative staging program for housing supply delivery across the entire 15 – 20 year timeframe of renewal.

¹⁸ ibid

¹⁹ ibid

²⁰ ibid

²¹ NSW Government (7 December 2023). A Shared Responsibility: The plan to begin addressing the housing crisis in NSW media release. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>

- d) ensure all affordable housing stock created (through development consent) can be transparently managed for a regulated definition of affordable housing, defined by the EP&A Act 1979²². This is to ensure all stock is tenanted to lower income (tenanted) households by registered Community Housing Providers (CHPs).

Shelter seeks Council confirmation delivery of affordable housing will be prioritised for those lower income households most in need (defined as no more than 30% of a household's gross income) to promote a sense of inclusivity²³ including essential workers.

The abovementioned commitments underpin a functional planning framework for the Burwood North renewal precinct that recognises the significant public benefit derived from the proposed variation to the land use mix for greater and unprecedented density and job opportunities in proximity of fast rail transit for the total 15,500 population²⁴.

It also highlights the significant role of Council in securing developer contributions for affordable housing delivered on site to encourage affordability for all parts of the community, which cannot be underestimated in the public interest.

As such, evidence of what will constitute the new conceptualised planning controls for affordable housing growth to be enacted is sought from Council upon full consideration of the issues raised in this submission. We look forward to be contacted over this.

Further details and or any amendments sought to render the Masterplan adequate follow.

²² NSW Government (2023). *Frequently asked Questions: What is affordable housing?* Retrieved from: <https://www.planning.nsw.gov.au/policy-and-legislation/housing/housing-sepp>

²³ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp_ed.PDF

²⁴ NSW Government (7 December 2023) A Shared Responsibility: The Plan to Begin Addressing the Housing Crisis in NSW. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>



Figure 1: Burwood North renewal precinct Source: Burwood North Precinct Masterplan: Masterplan Report (September 2023).

3. The Subject Site and its Context

Burwood North is located equidistance from Sydney CBD (12 km) and Parramatta (13km)²⁵. The precinct measuring 17 hectares in area straddles the Parramatta Road corridor across two LGAs of Burwood and Canada Bay²⁶ (**Figure 2**).

Shelter NSW notes Burwood is to play a key role in a region's centre hierarchy, as a strategic centre, expected to accommodate high levels of private sector investment and growth...acting as a transformational opportunity for the Burwood North Precinct²⁷.

Burwood is also identified as a centre serving transport corridor by Future Transport 2056 with the Burwood North Precinct serviced by a Sydney Metro West rail stop (whole timeline of the

²⁵ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp_ed.PDF

²⁶ ibid

²⁷ ibid

9 station alignment to Parramatta opening by 2032), with a train service every 4 minutes, and is expected to cut crowding by 30% at Burwood station²⁸.

In summary, Shelter notes the significance of the transport investment of Sydney Metro West within the Burwood North Precinct makes it uniquely placed to successfully leverage those connectivity and accessibility opportunities afforded by infrastructure to attract significant investment in employment and delivery of housing, health/medical, education and professional services and community benefits²⁹.



Figure 2: Site Context (Source: Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamped.PDF

²⁸ NSW Government, Metro West to supercharge housing supply across Sydney (7 December 2023) Retrieved from: <https://www.nsw.gov.au/media-releases/metro-west-to-supercharge-housing-supply>

²⁹ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamped.PDF

4. Overview of the Masterplan documents

Shelter NSW has reviewed the exhibition documents retrieved from: <https://participate.burwood.nsw.gov.au/burwood-north-precinct-masterplan>

including:

- Factsheets – Burwood North Masterplan https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/5816/9810/3689/Burwood_North_Masterplan_Factsheetsv10.pdf
- Burwood North Masterplan – Draft Burwood North Masterplan Report https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamped.PDF
- Burwood North Masterplan – Attachment 2 – Addendum to Community Facilities and Open Space Strategy https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/9716/9577/7327/Burwood_North_Masterplan_-_Attachment_2_-_Addendum_to_Community_Facilities_and_Open_Space_Strategy.PDF
- Burwood North Masterplan – Attachment 3 – First Nations Design Principles Report https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/7216/9577/7359/Burwood_North_Masterplan_-_Attachment_3_-_First_Nations_Design_Principles_Report.PDF
- Burwood North Masterplan- Attachment 4 – Geotechnical Assessment https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/1516/9577/7402/Burwood_North_Masterplan_-_Attachment_4_-_Geotechnical_Assessment.PDF

Key Issues

5. Effectiveness in addressing affordable housing issues in Burwood

Shelter NSW's submission is primarily concerned with the merits of the Masterplan for a minimum of 5% of GFA, delivered as affordable housing across the Precinct,³⁰ recognising 38.5% of 47% of renter households in Burwood pay more than 30% of their gross income in rent (ABS 2021)³¹. The severity of rental affordability based on share of income spent on rent for low to moderate income households within the private rental market indicates 9 of 10 tenanted households in the lowest 40% of income earning renter households are disproportionately represented in the Burwood LGA³² (**Table 1, Appendix A**).

Shelter also acknowledges a housing supply crisis in the current private rental market, with the lowest recorded rental vacancy level for Sydney registered in over a decade (1.3% in April 2023), announced by The Minister for Planning and Public Spaces, Paul Scully MP³³. Findings over the scale of undersupply of affordable housing provision across Greater Sydney (**Table 2, Appendix B**) reveal Burwood currently has no appropriate planning and or procedural mechanisms in place to generate affordable housing.

Further, with high levels of renters, Burwood compares to five of the eight LGAs identified for accelerated rezoning around Sydney transport hubs (**Table 3, Appendix C**) and is second only to Bankstown (of all the eight locations) in terms of the numbers of renters paying more than 30% of their gross household income in rent³⁴.

While LEP reform and the introduction of an Affordable Housing Contribution Scheme (AHCS) is envisaged and welcomed, the Transport Oriented Transport Program³⁵ highlights how delivery of the Sydney metro and potential to create thousands of new homes offers Council

³⁰ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp.ed.PDF

³¹ Rent Affordability Indicator (RAID) Census of Population and Housing: Census dictionary, (2021). Retrieved from: <https://www.abs.gov.au/census/guide-census-data/census-dictionary/2021/variables-topic/housing/rent-affordability-indicator-raid>

³² Tabled extract of Burwood's low to moderate household types and rental affordability based on [Rental Affordability Index | SGS Economics & Planning \(sgsep.com.au\)](#)

³³ Parliament of New South Wales (2023). Legislative Assembly Hansard Proof – *Environmental Planning and Assessment Amendment (Housing and Productivity Contributions) Bill 2023*. (Legislative Assembly 23 May 2023). Retrieved from: <https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/'HANSARD-1323879322-130756'>

³⁴ ABS 2021 Quick Stats: Burwood. Retrieved from: <https://www.abs.gov.au/census/find-census-data/quickstats/2021/LGA11300>

³⁵ NSW Government (7 December 2023). A Shared Responsibility: The plan to begin addressing the housing crisis in NSW. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>

the potential to capture additional public benefits (affordable housing incentives)³⁶ not considered by the Masterplan. The Burwood North renewal precinct will generate 5,366 new dwellings by 2043³⁷, over a 15 – 20 year period, and is generally comparable in its capacity to create new housing supply to the 5,975 per Sydney Transport Hub, delivered over a 15 year timeframe³⁸.

As recently as October 2023, the NSW government identified a significant gap in the approval of density and its capacity to deliver the homes, NSW needs to meet, under its Housing Accord target of 377,000 new homes by 2029³⁹, which has translated into a review of policy settings to tackle the housing crisis.

On the 14 December 2023 the Premier of NSW identified accelerated rezoning around eight of Sydney's metro and rail stations (Transport Oriented Development Program) requiring up to 15% affordable housing held in perpetuity at identified Sydney transport hub locations⁴⁰. The Sydney Metro West rail link delivering a station at Burwood North (expected to open in 2030) was not identified as one of the eight Sydney Transport Hub locations earmarked for accelerated rezoning, despite other metro west stations along the same alignment being identified by the Premier's announcement⁴¹. Importantly, however, is that each of the eight metro and rail locations announced in Sydney will now attract a minimum of 15% affordable housing held in perpetuity.

The Sydney Metro West rail link delivering a station at Burwood North is a new rail link aimed at aimed at 10 minute trips between Sydney CBD and Parramatta⁴². This rail link is what cement Burwood's strategic centre status within the Eastern City District⁴³ and creates the opportunity to support significantly more higher density living (over 5,000 new dwellings and employment investment (over 1,000 jobs in health/medical/educational and professional industries) by 2043⁴⁴. The specific yield breakdown for the renewal precinct can be viewed in **Figure 3**.

³⁶ Ibid

³⁷ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp_ed.PDF

³⁸ NSW Government (7 December 2023) A Shared Responsibility: The Plan to Begin Addressing the Housing Crisis in NSW. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>

³⁹ NSW Government (28 November 2023) New Planning rules to fast track low-rise and mid-rise housing. Retrieved from: <https://www.nsw.gov.au/media-releases/new-rules-to-fast-track-low-rise-and-mid-rise-housing>

⁴⁰ NSW Government (7 December 2023) A Shared Responsibility: The Plan to Begin Addressing the Housing Crisis in NSW. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>

⁴¹ Ibid

⁴² Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp_ed.PDF

⁴³ Ibid

⁴⁴ Ibid

Shelter NSW asserts that without transparently comparing the unearned increment of land value uplift, as quantified, for the North Burwood precinct and the eight identified Sydney Transport Hubs, which adopt a superior public benefit (15% held in perpetuity)⁴⁵, any decision taken on the less ambitious 5% minimum for the Burwood North precinct is a genuine source of public concern.

Without a more comprehensive assessment of how Burwood North compares to the announced Sydney Transport Hubs⁴⁶, there remains limited evidence of viability over how contributions, from redevelopment of the Burwood North precinct, generating opportunities for a minimum of 5% affordable housing⁴⁷ are deemed sufficient or feasible.

Rather, Shelter asserts that there are two issues arising from the Premier's announcement⁴⁸ that could directly influence the supply and maintenance of affordable housing within the renewal precinct, and as such, are of critical importance to the public interest. They include:

1. clarity over how a minimum of 5% of total FSR is equivalent to 15% affordable housing provision for all Sydney metro and rail stations undergoing accelerated renewal⁴⁹, including Burwood North.

Any shortfall identified will need to be pro-actively negotiated through Burwood's envisioned LEP reform. This will ensure all affordable housing stock created across Sydney's transport infrastructure, specifically fast transit metro, is transparently and effectively managed, to attain a minimum level of consistency.

2. an expectation affordable housing stock within the renewal precinct of Burwood North will be held in perpetuity in line with the enduring impact envisioned by affordable housing provision tied to Sydney transport hubs⁵⁰.

The performance of affordable housing provisions within the renewal precinct has the potential to deny Council an ability to more effectively address housing affordability issues within Burwood North to create a robust, socially diverse, residential population that promotes the public interest otherwise expected from directly comparable fast transit⁵¹.

As quantified, the renewal precinct has a potential development capacity for significant uplift attributed to the unprecedented higher density residential and mixed use focused around

⁴⁵ NSW Government (7 December 2023) A Shared Responsibility: The Plan to Begin Addressing the Housing Crisis in NSW. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>

⁴⁶ *ibid*

⁴⁷ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp_ed.PDF

⁴⁸ NSW Government (7 December 2023) A Shared Responsibility: The Plan to Begin Addressing the Housing Crisis in NSW. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>

⁴⁹ *ibid*

⁵⁰ *ibid*

⁵¹ NSW Government (7 December 2023) A Shared Responsibility: The Plan to Begin Addressing the Housing Crisis in NSW. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>

Burwood Road and the Burwood North Metro Station⁵² with capacity for almost 50,000m² employment GFA, almost 500,000m² residential GFA⁵³, 87% more dwellings at 5,366 than at present, to adequately stimulate urban renewal within the precinct to support a minimum of 15% affordable housing held in perpetuity.

The yield breakdown for the Burwood North Precinct is detailed below:

Employment Capacity	
Employment GFA Capacity	47,412m2 GFA
Potential Additional Jobs	1,355
Average GFA m2 per job	35
Residential Capacity	
Retained Dwellings	823
Residential GFA Capacity	482,947m2
Potential Additional Dwellings	5,366
Potential Total Dwellings	6,189
Potential Total Population (2.5ppd)	15,473

Figure 3: Yield Breakdown for the Burwood North Precinct

Source: Burwood North Precinct Masterplan Report – Burwood https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamped.PDF

Further, Burwood has one of the highest effective job densities (number of jobs that can be accessed by public transport from a particular area in Greater Sydney)⁵⁴. Shelter specifically points to a range of public transport services on offer including heavy rail (Burwood station south of the precinct), seven bus services within 400m and 12 bus services located within 800m of the Precinct, which travel east toward Sydney CBD or west towards Parramatta⁵⁵. Moreover, the opening of Sydney Metro West (2030) is expected to further increase both the residential and employment capacity of the area⁵⁶.

The significant role of influencing the supply of affordable housing at the heart of the renewal precinct cannot be underestimated based on accessibility to transport which deliver

⁵² Ibid

⁵³ Ibid

⁵⁴ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp ed.PDF

⁵⁵ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp ed.PDF

⁵⁶ Ibid

substantial land value uplift⁵⁷. Moreover, both residential and commercial properties alike increase in value near transport infrastructure hubs⁵⁸.

Further, the employment generating potential of the renewal precinct, almost 50,000m² in GFA, is more likely to be fully let and trade vibrantly, resulting in a greater net community benefit for the Burwood community, if, with a focus on capturing strong affordable housing incentives align to the significant returns on land value uplift capable of generating 1,355 jobs in addition to 5,366 dwellings⁵⁹. In keeping with the Premier's expectations for affordable housing outcomes around Sydney transport hubs⁶⁰, the capture of affordable housing incentives will be used to house essential workers, like health, teachers and hospitality, including for Burwood North's night time economy, close to Burwood North metro station.

Shelter NSW asserts to ensure the vision for growth for Burwood North is well planned, sustainable and meets the changing needs of the community⁶¹ and requires a clearer and unambiguous planning framework which transparently reviews the feasibility of enhancing Burwood North's affordable housing incentive capacity alongside other communities along the metro west alignment as part of the Transport Oriented Development Program⁶².

Shelter also asserts to ensure all affordable housing stock is managed effectively requires prioritising delivery of affordable housing in perpetuity to maximise its ongoing availability of affordable housing usage to all lower income (rental) households in the local community. To influence supply of affordable housing, time limited consents cannot, in themselves, influence promote or strengthen housing affordability within communities beyond a limited timeframe. The net result is a return of those dwellings and their lower income tenants to the vagaries of the private rental market. Housing affordability issues will otherwise continue as a critical and intractable problem for those lower income (rental) households (those most in need) in areas of higher land values, like Burwood.

Shelter asserts there is no disincentive for Council to capture additional contributions to fund affordable housing at 15% held in perpetuity associated with the unprecedented uplift in zoning, FSR and height of the indicative planning framework as proposed. Such an action by

⁵⁷ Densmore, Karley and Mulley, Corinne (2012) Accessibility and Residual Land Value Uplift: Identifying Spatial Variations in The Accessibility Impacts of ABus Transitway. Institute Of Transport and Logistics Studies the Australian Key Centre in Transport and Logistics Management. The University of Sydney. Issn1832-570x

⁵⁸ ibid

⁵⁹ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp_ed.PDF

⁶⁰ NSW Government (December 2023) A Shared Responsibility: The Plan to Begin Addressing the Housing Crisis in NSW. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>

⁶¹ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp_ed.PDF

⁶² ibid

Council recognises housing is a critical and intractable problem, not only across the eight identified Sydney transport hubs⁶³, but adjoining the Burwood North Metro Station.

In summary, it is difficult to reconcile how a minimum provision of 5% affordable rental housing, as proposed, is an adequate response to implement appropriate affordable housing growth for the overall vision for the Burwood North renewal precinct with its potential future land uses, total dwellings, population and jobs.

Therefore, Shelter is calling on Council for a re-negotiated alternative to the 5% of GFA in delivering affordable housing. This is in recognition of the significant public benefits associated with appropriate levels of low cost rental housing that remain affordable for the long term, prioritised by the Premier's announcement⁶⁴. Such critical actions embed principles for a vibrant and liveable precinct⁶⁵ within the Burwood North community.

5. Recommendation

Shelter recommends any LEP reform arising from the Master Planning process needs to include affordable housing provisions:

- a) which secure developer contributions for affordable housing which achieve a minimum level of consistency between either 15% of all homes created through renewal or 5% of total FSR whichever is the greater of the two measures.
- b) ensure any affordable housing stock generated is to be held in perpetuity (rather than a time limited period)
- c) deliver affordable housing on site, pro-rata and incrementally, in line with the indicative staging program for housing supply delivery across the entire 15 – 20 year timeframe of renewal.
- d) ensure all affordable housing stock created can be transparently managed for a regulated definition of affordable housing, defined by the EP&A Act 1979⁶⁶. This will ensure all stock is tenanted to lower income (tenanted) households by registered CHPs.

Shelter seeks Council confirmation delivery of affordable housing will be prioritised for those lower income households most in need (defined as no more than 30% of a households gross

⁶³ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp_ed.PDF

⁶⁴ *ibid*

⁶⁵ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood_North_Masterplan_Draft_Masterplan_Report_reduced_stamp_ed.PDF

⁶⁶ NSW Government (2023). *Frequently asked Questions: What is affordable housing?* Retrieved from: <https://www.planning.nsw.gov.au/policy-and-legislation/housing/housing-sepp>

income) to promote a sense of inclusivity⁶⁷, and for those within the local economy. This is in recognition of the significant public benefit derived from the proposed variation to the land use mix for greater and unprecedented density and job opportunities in proximity of fast rail transit for the total 15,500 population⁶⁸.

The significant role of Council securing developer contributions for affordable housing delivered on site, is to encourage affordability for all parts of the community by maximising their access to live and work at the very heart of the renewal precinct, which cannot be underestimated in the public interest.

As such, evidence of what will constitute the new conceptualised planning controls for affordable housing growth to be enacted is sought from Council upon full consideration of the issues raised in this submission.

6. Build to Rent as appropriate housing choices for renters in Burwood North

Shelter NSW recognises the potential offered by the introduction of Build to Rent housing options to create more and greater rental housing choice within the Burwood North renewal precinct. Shelter also recognises build to rent developments offer a new way of renting in the private rental market with the availability of ongoing rental tenure for the life of the building⁶⁹.

The NSW Government recently announced it will cut land tax for build-to-rent housing projects by 50% until 2040, making it particularly attractive for developers⁷⁰. Shelter is mindful that not all build to rent developments generated by this decision can or will be delivered to lower income (tenants) because of the potential for rental offered at more than the median rent for an area⁷¹ based on rental yield investors needing to get a return on their investment. This means such developments will likely continue as a premium housing option⁷².

⁶⁷ Burwood North Precinct Masterplan: Masterplan Report (September 2023). Retrieved from [https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood North Masterplan Draft Masterplan Report reduced stamp ed.PDF](https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/4216/9716/7859/Burwood%20North%20Masterplan%20Draft%20Masterplan%20Report%20reduced%20stamp%20ed.PDF)

⁶⁸ NSW Government (7 December 2023) A Shared Responsibility: The Plan to Begin Addressing the Housing Crisis in NSW. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>

⁶⁹ LGNSW Annual Conference 2023 Business Paper. Retrieved from: https://lgnsw.org.au/Common/Uploaded%20files/QR/Business_Paper.pdf

⁷⁰ Ibid

⁷¹ The Sun Herald (Aug 2023). *The Higher-rent option that tenants welcome*. Retrieved from: <https://www.smh.com.au/national/nsw/in-a-sydney-building-tenants-happily-pay-higher-rents-it-s-a-model-that-could-become-more-common-20230801-p5dt0d.html>

⁷² The Sun Herald (Aug 2023). *The Higher-rent option that tenants welcome*. Retrieved from: <https://www.smh.com.au/national/nsw/in-a-sydney-building-tenants-happily-pay-higher-rents-it-s-a-model-that-could-become-more-common-20230801-p5dt0d.html>

While Shelter acknowledges build to rent developments are not by definition affordable housing⁷³ products, they do offer safe, secure, reliable homes⁴³, appropriate as affordable rental housing growth. The positive impacts associated with such build to rent opportunities have the potential to influence the supply and maintenance of appropriate affordable housing rental growth, whose availability in Australia is growing over the next few years⁷⁴ (**Figure 4**). Availability of build to rent developments can influence and encourage affordability for all parts of a community and as such are in the public interest.

Shelter asserts there are opportunities for build to rent developments, which could maximise access for lower income tenanted households, if undertaken by Council or in partnership with CHPs, if applied to Burwood North. Shelter highlights local Sydney examples where proactive governance has produced high quality outcomes for communities such as the NSW Land and Housing Corporation project for build to rent social and affordable housing in North Parramatta⁷⁵. Or, 54 studio-like apartments (up to 35m²) rented below market rates with at least 20% offered to a range of household types, including carers and women over 55 in Marrickville, offered by non for profit property developer Nightingale Housing which has partnered with Fresh Hope Communities⁷⁶. Further, in other jurisdictions there are examples of build to rent developments specifically for essential workers at an subsidised rent. Such an example is available in Brisbane, Queensland⁷⁷.

Importantly, delivering build to rent properties, which proactively expedite much needed affordable housing provision, in high cost markets such as Sydney⁷⁸. could be used to overcome structural barriers to delivering appropriate rental properties within Burwood North. Shelter asserts nominated locations need to be considered within the Burwood North precinct where Council could negotiate such opportunities in the public interest.

⁷³ NSW Government (2023). *Frequently asked Questions: What is affordable housing?* Retrieved from: <https://www.planning.nsw.gov.au/policy-and-legislation/housing/housing-sepp>

⁷⁴ The Sun Herald (Aug 2023). *The Higher-rent option that tenants welcome*. Retrieved from: <https://www.smh.com.au/national/nsw/in-a-sydney-building-tenants-happily-pay-higher-rents-it-s-a-model-that-could-become-more-common-20230801-p5dt0d.html>

⁷⁵ The Sun Herald (Aug 2023). *The Higher-rent option that tenants welcome*. Retrieved from: <https://www.smh.com.au/national/nsw/in-a-sydney-building-tenants-happily-pay-higher-rents-it-s-a-model-that-could-become-more-common-20230801-p5dt0d.html>

⁷⁶ *ibid*

⁷⁷ *ibid*

⁷⁸ *ibid*

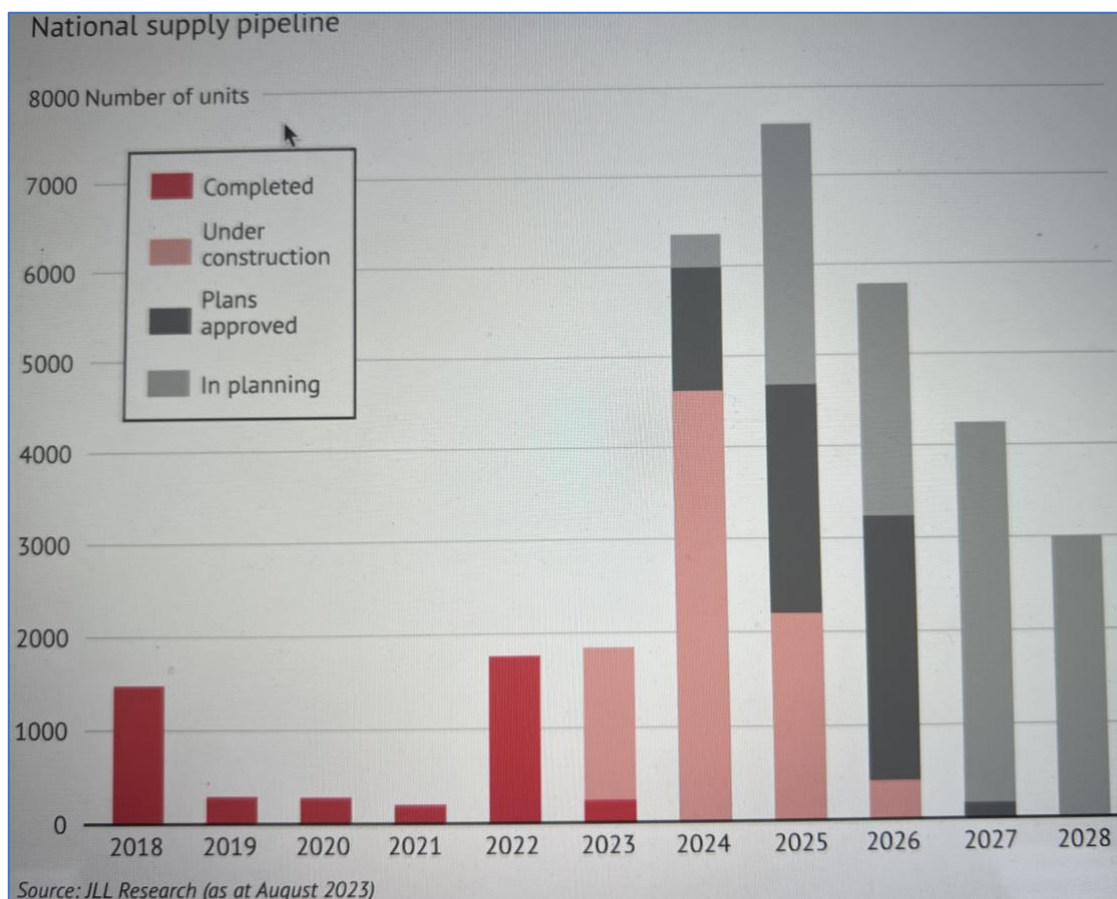


Figure 4: Timeframes for delivery of Australia’s build to rent developments.

Source: The Sun Herald (Aug 2023). *The Higher-rent option that tenants welcome*. Retrieved from: <https://www.smh.com.au/national/nsw/in-a-sydney-building-tenants-happily-pay-higher-rents-it-s-a-model-that-could-become-more-common-20230801-p5dt0d.html>

7. Social housing

Shelter previously called for the provision of critical social and economic infrastructure not just a welfare policy response⁷⁹ in response to exhibition of the Draft Burwood Local Strategic Planning Statement (2019). This response was a projected annual growth of 2.4%, the fourth largest in Sydney⁸⁰.

⁷⁹ NSW Shelter Response to Burwood Council Draft Local Strategic Planning Statement submission (September 2019). Retrieved from: https://shelternsw.org.au/wp-content/uploads/2020/11/Burwood_-_LSPS_Shelter_NSW_Submission.pdf

⁸⁰ NSW Shelter (September 2019). *Response to Burwood Council Draft Local Strategic Planning Statement submission*. Retrieved from: https://shelternsw.org.au/wp-content/uploads/2020/11/Burwood_-_LSPS_Shelter_NSW_Submission.pdf

Shelter also encouraged Council to explore the opportunity to secure additional social and community housing within the Burwood North Precinct with a target of 5% of all new dwellings to keep pace, with population growth set to continue⁸¹.

Shelter reiterates the need to target a minimum of 5% social housing to keep pace with population within the regulatory framework for Burwood North to proactively secure properties to help resolve the current and growing unmet need for social housing across the LGA made in its submission in December 2022⁸².

Although Shelter understands councils do not necessarily have a direct role in the provision of social housing and or public housing (for example those older residents on pensions), it nevertheless has an implied responsibility to work collaboratively with state and federal governments to ensure that the Burwood and new precinct around transport nodes has at least a 5% social housing safety net.

8. Built Form / Urban Design outcomes

Shelter acknowledges the significant size of re-development area, public domain and various built form responses for blocks (DAs) that will be staged across the entire renewal precinct. Shelter also notes design excellence competitions that will apply to key sites, creating a positive interface with the public domain and welcomes the potential quality of design outcomes for the new population of the renewal precinct.

Further, the intention to meaningfully integrate and implement the First Nations Design Principles⁸³ (opportunities for sensitive curation of plant species and public domain materials to enhance cultural landscape and Connecting to Country approach) into the design of each stage of the public domain including spaces (to establish a legible blue and green network through the precinct⁸⁴) and in built form responses to blocks in future development applications is welcomed.

Shelter also acknowledges the focus Council is seeking to establish for the planning rule possibilities to create a positive interface with the public domain, in protecting human scale particularly where higher density is focused (including around Burwood Road and Burwood North Metro Station) and in its pedestrian focus.

Shelter would also like to endorse key principles that Council has set out as actions which accord with Shelter's own including for greater housing diversity, universal design as a standard living blueprint for apartment living, enhancing pedestrian connectivity within and

⁸¹ ibid

⁸² ibid

⁸³ Burwood North Masterplan – Attachment 3 – First Nations Design Principles Report, August 2023. Retrieved from: https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/7216/9577/7359/Burwood_North_Masterplan_-_Attachment_3_-_First_Nations_Design_Principles_Report.PDF

⁸⁴ ibid

to Burwood Park, prioritising access to public transport linkages and to open space throughout the residential areas.

8. Recommendation

Shelter NSW recommends Council gives due consideration to appropriate conditions to set up a design review panel to oversee the overall development and its key features (urban design and built form responses) to ensure renewal of the precinct as a whole can be constructed and operated to ensure it retains the capacity to support the necessary design integrity for coherent growth across the expected 15 – 20 year timeframe⁸⁵ as this will result in a greater net community benefit for the Burwood North community and should have regard to:

- 1) surveyor endorsed A3 drawings with each future development application and all future land subdivision to ensure covenants are placed on the title to limit GFA for each development block to within the approved building envelopes and to ensure the maximum GFA for each development parcel does not exceed the total GFA for the site.
- 2) a City Datum Line is applied to all buildings across the entire Burwood North Renewal Precinct to ensure an appropriate pedestrian scale is maintained at street level throughout the precinct. Details of such are to be submitted at each future Development Application stage.
- 3) the need for detailed resolution of the form and bulk for commercial offices / retail and residential buildings along all roads and pedestrian links/lanes to improve the quality and amenity of the public domain including providing direct access into retail shops from pedestrian footpaths, entry lobbies to commercial offices or residential apartments; by locating services and fire exits on streets prioritising pedestrian activity to the extent possible in meeting BCA requirements; by minimising the number of driveways and their widths, network of pedestrian lands and thoroughfares that integrate strong, well defined and appropriately located embellished pedestrian paths with inviting vistas into and out of the site and to stronger links between the site and surrounding land uses and external street networks for appropriately located and timed footpath, cycle, bus, road and rail infrastructure upgrades necessary to develop and sustain a high quality town centre.
- 4) Further definition of the extent of landscaping, to ensure enhanced landscaping treatment can remove impressions of strip retail, reinforce prominent corners, preserve mid-winter solar access to public open space (park and plaza) and plant species are selected in response to the local native plant context which can integrate drought resistant, water saving management outcomes.

⁸⁵ ibid

- 5) To meaningfully integrate and implement the First Nations Design Principles⁸⁶ (opportunities for sensitive curation of plant species and public domain materials to enhance cultural landscape and Connecting to Country approach) into design of each stage of the public domain including spaces (to establish a legible blue and green network through the precinct⁸⁷) and in built form responses to blocks in future development applications.

9. Thank you

Shelter NSW appreciates and welcomes the opportunity to comment on the Burwood North renewal precinct in recognition of the significant public benefits to the local community. It is hoped the submission including suggested amendments, designed to serve the Burwood North community for realising improvements to both the nature and effect of affordable housing and definition of the urban structure for the precinct will add to the quality and experiences of the community, the Burwood North Renewal Precinct is designed to serve.

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

Sincerely Yours,

Pilar Aberasturi

Planning Policy Officer, Shelter NSW

Pilar Aberasturi

Sincerely Yours,

John Engeler

CEO, Shelter NSW

John Engeler

⁸⁶ Burwood North Masterplan – Attachment 3 – First Nations Design Principles Report, August 2023. Retrieved from: https://hdp-au-prod-app-burwd-participate-files.s3.ap-southeast-2.amazonaws.com/7216/9577/7359/Burwood_North_Masterplan_-_Attachment_3_-_First_Nations_Design_Principles_Report.PDF

⁸⁷ ibid

Appendix A

Table 1: Rental Affordability Index by household type in Burwood LGA

<i>Household Type</i>	<i>Indictive gross annual income</i>	<i>RAI Score</i>	<i>Rent as a share of income*</i>	<i>Relative Unaffordability Category</i>
Single person on Jobseeker	\$22,100	17	60% or more	Extremely unaffordable
Single pensioner	\$36,700	31	60% or more	Extremely unaffordable
Single part-time worker parent on benefits	\$44,800	31	60% or more	Extremely unaffordable
Pensioner couple	\$54,300	37	60% or more	Extremely unaffordable
Hospitality worker	\$62,800	61	38-60%	Severely unaffordable
Student share house	\$84,800	52	38-60%	Severely unaffordable
Minimum wage couple	\$91,800	61	38-60%	Severely unaffordable
Single income couple with children	\$104,500	64	38-60%	Severely unaffordable
Single full-time working parent	\$104,500	71	38-60%	Severely unaffordable
Dual income couple with children	\$209,000	131	20-25%	Acceptable rents

* Low to moderate income Australian household types - Source: SGS Economics and Planning November 2023 [Rental Affordability Index](#)

Appendix A

Table 1: Rental Affordability Index by household type in Burwood LGA

TABLE 1. RENTAL AFFORDABILITY INDEX AND SEVERITY OF RENTAL UNAFFORDABILITY

Index score	Share of income spent on rent	Relative unaffordability
<50	60% or more	Extremely unaffordable rents
51-80	38-60%	Severely unaffordable rents
81-100	30-38%	Unaffordable rents
101-120	25-30%	Moderately unaffordable rents
121-150	20-25%	Acceptable rents
151-200	15% or less	Affordable rents
>200		Very affordable rents

Appendix C

Table 3: Comparison renters, renter households paying > 30% household income for Sydney Transport Hubs¹ by LGA

LGA	Rent	Pay more than 30% of household income
Bays West	Not available	Not available
Burwood	47%	38.5%
Bankstown	42.6%	46.8%
Hornsby	23%	33.5%
Kellyville	19.2%	26.4%
Homebush	57.8%	29%
Crows Nest	50.3%	23.9%
Kellyville	19.2%	26.4%
Macquarie Park	65.8%	36.8%
Bella Vista	12.6%	26.9%

Source: ABS Quick Stats – Various LGAs (2021)

The table provides for indicative differences in renters and renter households paying greater than 30% household income are listed by LGA where accelerated rezoning by 2024.

Delivery for up to 47,800 homes is expected from fast rezoning surrounding eight identified Sydney transport hubs over the next 15 years, announced by the NSW Premier in December 2023².

The eight identified Sydney transport hubs include: Bankstown, Bays West, Bella Vista, Crows Nest, Homebush, Hornsby, Kellyville and Macquarie Park³.

¹ NSW Government (7 December 2023) A Shared Responsibility: The Plan to Begin Addressing the Housing Crisis in NSW. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>

² ibid

³ NSW Government (7 December 2023) A Shared Responsibility: The Plan to Begin Addressing the Housing Crisis in NSW. Retrieved from: <https://www.nsw.gov.au/media-releases/addressing-housing-crisis-nsw>

Appendix B

Table 2: Affordable Housing delivery details for 33 LGAs of Greater Sydney

LGA – Greater Metro Sydney	Instrument Clauses / definition of AH	AHCS / Plan	Planning Agreement Register that includes VPA with an AH contribution	AH dwellings
Bayside City Council	<p>Bayside LEP 2021</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2021-0498</p>	<p>Local Housing Strategy 2020-2036</p> <p>Bayside Affordable Housing Background 2021</p> <p>\\srv\RedirectedFolders\stacey\Desktop\Local Government\LG AH Systems\Bayside Council\Bayside Affordable Housing Background Report 2021.pdf</p> <p>Bayside Affordable Housing Strategy 2021</p> <p>\\srv\RedirectedFolders\stacey\Desktop\Local Government\LG AH Systems\Bayside Council\Bayside Affordable Housing Strategy 2021.pdf</p>	<p>Yes VPA with AH</p> <p>https://www.bayside.nsw.gov.au/services/planning-and-building/planning-our-city/planning-agreements#-planning-agreements-register-</p>	Yes

		<p>Section 7.11 Dev Contributions Plan 2016 (Amendment 1) will apply to the site at the development application (DA) stage.</p> <p>VPA</p> <p>In addition, the proponent is willing to enter into a planning agreement with council to deliver additional public benefit through a monetary contribution towards the local infrastructure such as community facilities and public open space improvements (Or the like).</p>		
Blacktown City Council	<p>Blacktown LEP 2015</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2015-0239</p>	<p>Blacktown Housing Strategy 2020</p> <p>https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Blacktown.pdf</p> <p>No affordable housing strategy</p>	<p>No AH in VPAs</p> <p>https://www.blacktown.nsw.gov.au/Plan-build/Stage-2-plans-and-guidelines/Section-7.11-Plans-Planning-Agreements-Works-in-Kind-and-Contributions-Register/Planning-Agreements-Register</p>	No.

Blue Mountains Council	<p>Blue Mountains LEP 2015</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2015-0829</p> <p>BM LEP 2015:</p> <p>Cl.6.22 – Incentives for providing AH – add 15% of the max GFA with 50% of incentive used for AH for at least 3 years on title.</p> <p>Blue Mountains LEP 2005</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2005-0633</p> <p>BM LEP 2005</p> <p>Cl 12 – Principal Objectives of the Plan – to promote affordable housing options</p>	<p>Local Housing Strategy 2020</p> <p>https://www.bmcc.nsw.gov.au/sites/default/files/docs/Blue%20Mountains%20Local%20Housing%20Strategy_March%202020.pdf</p> <p>No adopted Affordable Housing Strategy</p>	<p>No AH in VPAs</p> <p>https://www.bmcc.nsw.gov.au/development/planning-rules/infrastructure-contributions-planning-agreements</p> <p>Note</p>	No

	<p>Blue Mountains LEP 1991</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0683</p>			
Burwood Council	<p>Burwood LEP 2012</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2012-0550</p>	<p>BURWOOD HOUSING STRATEGY</p> <p>Endorsed by Council on 11 February 2020</p>	<p>No AH in VPAs</p> <p>https://www.burwood.nsw.gov.au/Planning-Building/Development-Contributions-Voluntary-Planning-Agreements</p>	No.
Camden Council	<p>Camden LEP 2010</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2010-0514</p>	<p>Local Housing Strategy October 2020</p>	<p>No AH in VPAs</p> <p>https://www.camden.nsw.gov.au/strategic-planning/section-7-11/voluntary-planning-register/</p>	No.
Campbelltown Council	<p>Campbelltown LEP 2015</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2015-0754</p>	<p>Local Housing Strategy</p> <p>Endorsed by Campbelltown City Council</p> <p>29 September 2020</p>	<p>https://www.campbelltown.nsw.gov.au/Build-and-Develop/Planning-Policies-and-Controls/Planning-Agreement-Register</p>	Yes AH Units

	Cl.8.4 AH in area B – (8.4 (1)& 8.4 (2) at least 5% of GFA used for res accommodation as AH (gross floor area of 50sqm).			
Canada Bay Council	<p>Canada Bay LEP 2013</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0389</p> <ul style="list-style-type: none"> • Cl.6.12 AH contribution area. • Area 4 – 3.5% that exceeds floor space by applying a FSR of 1.76: 1 • 4% of relevant fl area (res) in Burwood AHC area • 4% relevant fl area in Hmbush AHC area • 4% relevant fl area in Kings Bay • 5% - Concord West, Rhodes East, Five Dock • 	<p>CANADA BAY LOCAL HOUSING STRATEGY 2019</p> <p>Council uses VPAs to deliver AH units</p>	<p>Long standing commitment to AH - 2007</p> <ul style="list-style-type: none"> • 26 in perpetuity via VPA framework • NRAS support • Lobbied for an LGA wide AH scheme <p>Future</p> <p>Canada Bay LEP (2013) introduced AH scheme (2021)</p> <p>Rates: 3.5% – 5% of res GFA) on identified sites.</p> <p>Choice to contribute one / more dwgs. (50sqm +) and or monetary</p> <p>https://www.canadabay.nsw.gov.au/development/plans-</p>	Yes.

			policies-and-controls/planning-agreements Notes: The identified growth is mostly on sites to come : Anticipated AH deliverables: 100 Rhodes (east and west) 150 – 200 (Parramatta Urban Strategy Precinct Areas) Bushell's site (Concord) under negation Planning proposals for residential / mixed use development.	
Canterbury Bankstown Council	Canterbury – Bankstown LEP 2023 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2023-0336	Canterbury Bankstown Council Local Housing Strategy June 2021 Draft Affordable Housing Strategy 2020 \\srv\RedirectedFolders\stacey\Desktop\Local Government\LG AH Systems\Canterbury - Bankstown\Draft Affordable Housing Strategy Background Report WEB.pdf	No https://www.cbcity.nsw.gov.au/development/planning-control-policies/planning-agreements-register	No

		<p>Draft Affordable Housing Agreement</p> <p>\\srv\RedirectedFolders\stacey\Desktop\Local Government\LG AH Systems\Canterbury - Bankstown\Draft Planning Agreement Policy Amendments - WEB.pdf</p>		
Cumberland City Council	<p>Cumberland LEP 2021</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2021-0651</p> <p>AH – Dictionary</p>	<p>Cumberland Council Local Housing Strategy July 2020</p>	<p>Cumberland Planning Agreement</p> <p>https://www.cumberland.nsw.gov.au/voluntary-planning-agreements</p> <p>8 AH units from a VPA</p>	Yes
Fairfield City Council	<p>Fairfield LEP 2013</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0213</p>	<p>Fairfield City Local Housing Strategy 2020</p>	<p>Fairfield Planning Agreement</p> <p>https://www.fairfieldcity.nsw.gov.au/Planning-and-Building/Planning-and-Policies/Planning-Agreements</p>	Yes.

			However, the register of planning agreements on exhibition, executed and or concluded do not show any planning agreements where AH has been acquired.	
Georges River Council	Georges River LEP 2021 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2021-0587	Local housing strategy August 2020 Georges River Inclusive Housing Strategy 2022 \\srv\RedirectedFolders\stacey\Desktop\Local Government\LG AH Systems\Georges River Council\Georges-River-Inclusive-Housing-Strategy-August-2020.PDF	https://www.georgesriver.nsw.gov.au/Development/Planning-Controls/Development-Contributions-and-Planning-Agreements/Voluntary-Planning-Agreements Yes but no AH provision in the register of executed agreements dating from 2011 to 2023.	
Hawkesbury	Hawkesbury LEP 2012 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2012-0470 1.2 Aims of Plan	Hawkesbury Local Housing Strategy August 2020	https://www.hawkesbury.nsw.gov.au/plan-and-build/planning-policies/planning-agreements	No AH
Hornsby Council	Hornsby LEP 2013 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0569	Hornsby Local Housing Strategy 2021	https://www.hornsby.nsw.gov.au/property/build/application/development-contributions	Yes AH

	<p>Cl.7.2 Objective of Part – Cherrybrook Station Precinct</p> <p>Cl. 7.6 Height of Buildings – Area 1</p> <p>– Height up to 23.5m subj to accept massing/amenity</p> <ul style="list-style-type: none"> - 10% RFA in Area 10 used for affordable housing for at least 10 years from occupation. 			
Hunters Hill Council	<p>Hunters Hill LEP 2012 (2013 EPI 34)</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0034</p>	<p>Hunter’s Hill Local Housing Strategy 12 May 2021</p>	<p>https://www.huntershill.nsw.gov.au/development/plans-policies-and-controls/voluntary-planning-agreements/voluntary-planning-agreements-register/</p> <p>No evidence of AH in the two planning agreements listed.</p>	No AH
Inner West Council	<p>Inner West LEP 2022</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2022-0457</p> <p>Cl.4.3A Exception to max height of blgs in Ashfield town Centre</p>	<p>Our Inner West Housing Strategy March 2020</p> <p>Inner West Affordable Housing Policy</p> <p>Affordable Housing Policy 2022.pdf</p>	<p>https://www.innerwest.nsw.gov.au/develop/plans-policies-and-controls/strategic-plans/voluntary-planning-agreements</p>	Yes AH

	<p>Cl.6.17 Dev of Land at 168 Norton St, Leichhardt</p> <p>Cl. 6.19 Dev of land at 17 Marion St, Leichhardt</p> <p>Cl. 6.25 Dev of land at 469 – 483 Balmain Rd, Lilyfield</p> <p>6.33 Affordable Housing</p>	<p>Affordable Rental Housing Program and Procedures 2019</p> <p>Position Paper: Best Practice in Value Capture March 2017</p> <p>Planning Tools and Planning Agreements</p>	<p>Leichhardt Council had a long-standing commitment to deliver AH prior to amalgamation</p> <p>19 dwellings in perpetuity.</p> <p>Via Planning Agreements</p> <p>Future</p> <p>Awaiting Inner West LEP 2020 gazettal. AH Policy (2022) adopted in May to add AH by:</p> <p>Planning agreements</p> <p>inclusionary zoning in the form of AH Contribution Scheme under SEPP (Housing) 2021</p> <p>ARHP (key worker program)</p> <p>Affordable housing development and management partnerships with a relevant CHP / private sector.</p>	
Ku-ring-gai Council	Ku-ring-gai LEP 2015	Ku-ring-gai Housing Strategy to 2036 December 2020	https://www.krg.nsw.gov.au/Planning-and-development/Building-and-	

	https://legislation.nsw.gov.au/view/html/inforce/current/epi-2015-0134 Cl.6.13 Lindfield Village Hub – Res fl spac greater than 1.35: 1 used for AH	No AH but, evidence in the AH clauses in the LEP 2015	renovations/Development-contributions/Planning-agreements	
Lane Cove Council	Lane Cove LEP 2009 (2010 EPI 49) https://legislation.nsw.gov.au/view/html/inforce/current/epi-2010-0049 <ul style="list-style-type: none"> • Cl.7.1 Dev on land in St Leonards South Area • Cl. 7.3 – Min AH requirements: • Area 1 – 14 dwgs • Area 2, 3, 4 – 7 dwgs • Area 6, 12, 14, 2 dwgs • Area 13, 17 – 1 dwg 	Lane Cove Council Local housing strategy July 2021	https://www.lanecove.nsw.gov.au/Development/DA-Process/Planning-Agreements	
Liverpool Council	Liverpool LEP 2008 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2008-0403 Liverpool Plains LEP 2011 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2011-0644	Liverpool Local Housing Strategy July 2021	https://www.liverpool.nsw.gov.au/development/liverpools-planning-controls/planning-agreements	No AH

Mosman Council	<p>Mosman LEP 2012 (2011 EPI 647)</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0140</p>	Local Housing Strategy A Place 2020	https://mosman.nsw.gov.au/planning-and-development/planning-controls/planning-agreements-policy	No AH
North Sydney Council	<p>North Sydney LEP 2013</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0411</p> <p>Cl. 1.2 Aims of Plan</p>	Local Housing Strategy 2019	https://www.northsydney.nsw.gov.au/proposed-developments-approvals/view-voluntary-planning-agreements	Yes AH
<p>Northern beaches council.</p> <p>(Pittwater, Narrabeen, Frenchs Forest, Curl Curl & Manly)</p>	<p>Manly LEP 2013</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0140</p> <p>Cl. 1.2 Aims of Plan</p>	<p>Northern Beaches Local Housing Strategy</p> <p>Future</p> <p>Council and the State Government worked on the inclusion of an AH target in redevelopment precincts through Warringah LEP 2011 requiring:</p>	https://www.northernbeaches.nsw.gov.au/planning-and-development/building-and-renovations/planning-agreements	<p>Yes AH.</p> <p>6 dwellings (Narrabeen).</p>

		<p>15% key worker AH target in town centre of French's Forest</p> <p>10% key worker AH target on periphery</p> <p>The primary target group for affordable housing is essential workers (key workers). These are jobs considered important to local economies.</p> <p>Goal: Deliver 1,880 AH dwellings from planning proposals by 2036</p>		
<p>Northern beaches Warringah</p>	<p>Warringah LEP 2000</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2000-0690</p> <p>Cl.6.11 AH contribution area</p> <p>Warringah LEP 2011</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2011-0649</p>		<p>https://www.northernbeaches.nsw.gov.au/planning-and-development/building-and-renovations/planning-agreements</p>	
<p>Northern beaches Pittwater .</p>	<p>Pittwater LEP 2014</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2014-0320</p>		<p>https://www.northernbeaches.nsw.gov.au/planning-and-development/building-and-renovations/planning-agreements</p>	

			renovations/planning-agreements	
Parramatta City Council	<p>Parramatta LEP 2023</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2023-0117</p>	Local Housing Strategy 2020	https://www.cityofparramatta.nsw.gov.au/sites/council/files/2020-03/Voluntary%20Planning%20Agreements%20policy.pdf	Yes AH.
Penrith Council	<p>Penrith LEP 1991 (Environmental Heritage Conservation (1991 EPI 674)</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0674</p> <p>Penrith LEP 1998 (Urban Land) (1991 EPI 9)</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-1999-0009</p> <p>Cl. 9. Zone objectives and dev control table</p>	Local Housing Strategy 2022	https://www.penrithcity.nsw.gov.au/building-development/planning-zoning/planning-controls/voluntary-planning-agreements	Yes AH.

Penrith Council	<p>Penrith LEP 2010</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2010-0540</p> <p>Zone R4 High Density Residential</p> <p>Penrith LEP No. 201 (Rural Lands) (1991 EPI 364)</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0364</p> <p>Cl. 7.31 AH contributions</p> <p>Penrith LEP No. 255 – Exempt and Complying Development (2000 EPI 122)</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2000-0122</p>	Local Housing Strategy 2022		No AH
Randwick Council	<p>Randwick LEP 2012 (2013 EPI 36)</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0036</p>	<p>Long standing commitment to delivering AH (1996).</p> <p>20 in perpetuity.</p>	Used Planning agreement in the past and dedicated Council land to AH projects	Yes AH

	<p>Cl.6.18 AH @ Kensington & Kingsford Town Centres – requires a contribution 3% of TFA for res dev in Area 1 up to Aug 22</p> <p>From Aug 22, requires a contribution 5% of TFA for res dev.</p>	<p>10 VPA negotiated (162 Barker Street, Randwick - Newmarket Green) of 750 dwellings.</p> <p>8 units jointly with CHP - 50% equity 4 council</p> <p>Future</p> <p>An AH contribution scheme applies across Kingsford / Kensington Town Centres as part of Randwick LEP 2012.</p> <p>Rate of 3% of total floor area used for residential (up to Aug 2022)</p> <p>Rate of 5% total floor area of residential (from Aug 2022).</p> <p>Goal:</p> <p>200 AH units across Kingsford / Kensington in 15 years.</p>	<p>https://www.yoursay.randwick.nsw.gov.au/voluntaryplanningagreements</p>	
Ryde Council	<p>Ryde LEP 2014</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2014-0608</p>		<p>https://www.ryde.nsw.gov.au/Planning-Development/Voluntary-Planning-Agreements/Voluntary-Planning-Agreements-Register#:~:text=Planning%20Ag</p>	Yes AH

			reements%20are%20a%20legal%20Act%201979%20(EPA%20Act).	
Strathfield Council	Strathfield LEP 2012 (2013 EPI 115) https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0115		https://www.strathfield.nsw.gov.au/develop/developer-contributions-and-voluntary-planning-agreement-register/	Yes AH.
Sutherland Council	Sutherland Shire LEP 2006 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2006-0669 Cl. 49 (g) Urban Design – res buildings (Opportunities for AH) Sutherland Shire LEP 2015 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2015-0319 AH – Dictionary		https://www.sutherlandshire.nsw.gov.au/plan-and-build/Planning-considerations/planning-agreements-vpa	Yes AH.

	Cl. 6.17 (g) Urb Des – residential accommodation (opportunities for AH)			
Sydney City	<p>Long standing commitment to delivering AH</p> <p>Section 94A of the EPA Act 1979</p> <p>VPA's</p> <p>South Sydney LEP 1998 (Green Square)</p>	<p>Sydney City LEP 2012 Clause (e) to encourage the growth and diversity of the residential population of the City of Sydney by providing for a range of appropriately located housing, including affordable housing,</p> <p>Council amended its AH contributions in 2020</p> <p>It introduced an AH contribution scheme across the LGA defined by precincts.</p> <p>Rates vary from 3% to 1% for residential and no residential zones and are indexed over time</p>	<p>Planning Agreement</p> <p>https://www.cityofsydney.nsw.gov.au/council-governance-administration/planning-agreement-register#:~:text=Planning%20agreements%20are%20negotiated%20between,VPA%20in%20the%20ePlanning%20portal.</p>	<p>Yes AH</p> <p>City West 1995 (Pyrmont / Ultimo)</p> <p>2022 - 808 dwellings in perpetuity with a target of 11,690 by 2036.</p>
The Hills Council	<p>The Hills LEP 2019</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2019-0596</p>	<p>Landcom and Sydney Metro aim to deliver up to 55 Affordable Housing dwellings at Tallawong station precinct.</p> <p>These properties will be managed by Bridge Housing Group based on the Ministerial</p>	<p>https://www.thehills.nsw.gov.au/Building/Planning-Guidelines/Development-Contributions/Voluntary-Planning-Agreements-Register-Archive</p>	<p>Yes, AH Units</p> <p>55</p>

		Guidelines (market rent not household income).		
Warringah (northern beaches)	<p>Warringah LEP 2000 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2000-0690</p> <p>Cl.6.11 AH contribution area</p> <p>Warringah LEP 2011 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2011-0649</p>	Northern Beaches Local Housing Strategy	https://www.northernbeaches.nsw.gov.au/planning-and-development/building-and-renovations/planning-agreements	
Waverley Council	<p>Waverley and Woollahra Joint LEP 1991 – Bondi Junction Commercial Centre (1991 EPI 442) https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0442</p> <p>Waverley LEP 2012</p>	<p>Waverley Local Housing Strategy 2020 – 2036</p> <p>Waverley Affordable Housing Policy.pdf Systems\Waverley\Waverley Affordable Housing Policy.pdf Waverley Affordable Housing Contributions Scheme.pdf</p> <p>Waverley Affordable Housing Contributions Scheme.pdf</p>	<p>https://www.waverley.nsw.gov.au/building/planning_a_development/policies_and_guidelines/planning_agreements</p> <p>Affordable Housing Policy adopted in 1996</p> <p>25 in perpetuity Via planning agreements</p> <p>47 older person time limited</p>	<p>Yes AH Units</p> <p>25 in perpetuity</p>

	https://legislation.nsw.gov.au/view/html/inforce/current/epi-2012-0540 AH permissible in the following zones / dev sites: Zone R3 (Med Den), Zone R4 (High Den), Zone B1 (Local Centre), Zone MU1 (Mixed Use), Cl.6.13 (Dev at Edina Estate, Waverley).	Future Waverley Affordable Housing Contributions Scheme 2020 recommended a percentage range across the LGA of 1-3% contribution on all new residential apartment development and 10 % contribution on sites receiving uplift	3 home share - disabilities	
Willoughby Council	Willoughby LEP 2012 https://legislation.nsw.gov.au/view/html/inforce/current/epi-2012-0679 Cl.1.2 Aims of Plan Cl.4.4 FSR – part for AH not taken as GFA of the building in Area 3 (special provisions area map) Cl.6.8 AH - principles incl. managed so represents v low, low and	Willoughby Housing Strategy 2036 Affordable Housing Policy - Final.docx (2).pdf Local Centres Strategy to2036 MAY2020 WCC.pdf AH 37 homes currently 70 AH unit as an aspirational target 10% AH target	https://www.willoughby.nsw.gov.au/Development/Plan/Development-Contributions/Voluntary-Planning-Agreements	Yes AH units 37 AH in perpetuity

	moderate income and maintained for their continued use.	<p>2020 WCC undertook a feasibility analysis to develop affordable housing projects on Council owned sites.</p> <p>Sailors Bay Road AHP –</p> <p>Adaptive reuse of existing library building for AH. -utilized, hall space</p> <p>into 2 affordable housing units (1 x 1 Bed & 1 x 2 Bed units)</p> <p>Abbot Road, Artarmon -</p> <p>Council owned land 26 AH units by 2026</p>		
Wollondilly Shire Council		Local Housing Strategy 2021	https://www.wollondilly.nsw.gov.au/planning-and-development/development-contributions/planning-agreements-register/	No.
Woollahra Council	<p>Woollahra LEP 2014 (2015 EPI 20)</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2015-0020</p>	Woollahra Local Housing Strategy 2021	https://www.woollahra.nsw.gov.au/data/assets/pdf_file/0007/213973/Voluntary Planning Agreement Policy.pdf.pdf	No.