

# **Shelter NSW submission on the *Bradfield City Centre Masterplan – (Feb 2024)***

***A secure home for all***

4 March 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:

<b>Affordable and diverse homes</b>	<b>Accessible, well-located housing</b>	<b>Appropriate, high-quality development</b>
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
<b>Productive cities and regions</b>	<b>Poverty-free communities</b>	<b>Protected neighbourhoods</b>
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

Shelter NSW has consistently called for the rebuilding of the state’s stock of social housing (public and community)<sup>1</sup> to provide for those low-income people unable to compete in the private housing market. The medium-term return to 5% of all housing stock (and 10% by 2040) would create a reliable safety net, substantial asset base and critical infrastructure for a growing population. Social housing stock of this size would create a genuine alternative to those struggling in the precarious and unaffordable private rental market.

Shelter NSW has also called for the expansion of affordable housing, in addition to social housing not instead of it. We have consistently called for the NSW Government to ensure that any housing supply growth is accompanied by requirements for social and affordable housing. We are strong advocates for a regulated definition of affordable housing according to the EP&A Act, 1979, appropriately priced for very low (less than 50% of median income), low (50 – 80% of median income), moderate income (80 – 120% of median income) households, with an expectation of paying no more than 30% of gross income on rent<sup>2</sup>.

Shelter NSW commends the NSW Government for its recognition of the impact of the housing crisis and its commitment to make change; and notes the Government’s commitment to deliver 30% social/affordable housing on any public land that it redevelops for residential purposes.

<sup>1</sup> [221206\\_Shelter-NSW-2023-State-Election-platform.pdf \(sheltersnsw.org.au\)](https://www.sheltersnsw.org.au/221206-Shelter-NSW-2023-State-Election-platform.pdf)

<sup>2</sup> s1.4 of Environmental Planning & Assessment Act 1979; cl. 13 of State Environmental Planning Policy (Housing) 2021

# 1. Executive Summary

Shelter NSW (Shelter) welcomes and appreciates the opportunity to comment on the exhibited Bradfield City Centre Masterplan<sup>3</sup>, which sets out a draft planning framework for an entirely new city centre<sup>4</sup> which will be the core precinct for the development of the Western Sydney Aerotropolis<sup>5</sup> and broader Western Sydney through which the Sydney Metro Western Sydney Airport line (commencing in 2026) will cross<sup>6</sup>.

Shelter notes the Aerotropolis Masterplan has evolved out of earlier iterations. Shelter previously raised specific concerns to provide social and affordable housing at a scale proportional to growth envisaged in the Western Sydney Aerotropolis in both 2021 and 2022<sup>7</sup>.

In these earlier submissions, Shelter reflected on the apparent exclusion of any meaningful action to support the housing needs of people on low-moderate incomes who are expected to live and work in the Aerotropolis. Shelter called for safeguards, by way of proactive commitments and actions by the NSW Government, so that the private housing market will be rendered affordable for essential workers and lower income households and or insecure wages<sup>8</sup>.

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<sup>3</sup> Western Parkland Authority Australia Pty Ltd (October 2023). Planning Report – Western Parkland City Authority. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

<sup>4</sup> WPCA (October 2023). Bradfield City Centre Master Plan Application Housing Strategy – Summary Statement. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/29.+Appendix+BB+20231020+Housing+Strategy+Statement+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/29.+Appendix+BB+20231020+Housing+Strategy+Statement+Report.PDF)

<sup>5</sup> Western Parkland Authority Australia Pty Ltd (October 2023). Planning Report – Western Parkland City Authority. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

<sup>6</sup> Western Parkland Authority Australia Pty Ltd (October 2023). Planning Report – Western Parkland City Authority. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

<sup>7</sup> Shelter NSW Submission (2021) Submission on Initial Place-based Infrastructure Compact for the Western Parkland City. Retrieved from: <https://shelternsw.org.au/wp-content/uploads/2021/02/Shelter-NSW-Submission-PIC.pdf> and Shelter NSW Submission (31 March 2022). Submission on the Draft Western Parkland City Blueprint. Retrieved from: [https://shelternsw.org.au/wp-content/uploads/2022/04/220331\\_WPC\\_Blueprint\\_Submission\\_SM\\_template-1.pdf](https://shelternsw.org.au/wp-content/uploads/2022/04/220331_WPC_Blueprint_Submission_SM_template-1.pdf)

<sup>8</sup> *ibid*

The current iteration of the Bradfield City Centre Master Plan now exhibits changes to planning controls including to the exhibited SEPP (Precincts-Western Parkland City) 2021, Western Sydney Aerotropolis Precinct Plan and Western Sydney Aerotropolis DCP – Phase 2. Shelter NSW’s current submission (and the third made by Shelter overall) specifically concerns itself with an assessment of the intent and merits of the Bradfield City Centre Master Plan and its capacity to effectively generate genuine social and affordable housing within a city centre intended to facilitate growth, including up to 15,200 residents; the majority in high density unit housing<sup>9</sup>, 24,000 jobs and 10,000 dwellings from 2026 through to 2056<sup>10</sup>. An artist’s impression of the Bradfield City Centre is provided in **Figure 1**.



**Figure 1:** Photomontage of the Bradfield City Centre in context of high density apartment living planned around the Aerotropolis metro station. Source: WPCA Planning Report. Retrieved from [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

Shelter asserts there is no adequate Master Plan response to guide delivery of opportunities for key affordable housing development despite the significantly increased densification and total housing capacity within the Bradfield City Centre of the Western Sydney Aerotropolis<sup>11</sup>

<sup>9</sup> GHD (October 2023). Bradfield City Centre Master Plan Application WPCA Master Plan Social Infrastructure Strategy. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/15.+Appendix+N+-+20231020+Social+Infrastructure+Strategy+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/15.+Appendix+N+-+20231020+Social+Infrastructure+Strategy+Report.PDF)

<sup>10</sup> Western Parkland Authority Australia Pty Ltd (October 2023). Planning Report – Western Parkland City Authority. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

<sup>11</sup> ibid

Shelter notes the Bradfield City Centre site, measuring 114.6 ha in area, is a Commonwealth government owned greenfield site<sup>12</sup>, within the Liverpool LGA.

The Western Parkland City Authority (WPCA) is the NSW Government Agency responsible for delivering, coordinating and attracting investment to the Western Parkland City. A key component is the delivery of the Bradfield City Centre.

The WPCA (proponent) was granted permission by the (then) NSW DPE to prepare a master plan for the Bradfield City Centre<sup>13</sup>. The Department of Planning, Housing and Infrastructure (DPHI) is the assessing authority for the exhibited Master Plan.

The proponent's Planning Report<sup>14</sup> sets out the justification (Master Plan responses) to the proposed statutory amendments to allow for future development within the Bradfield City Centre<sup>15</sup>.

However, as exhibited<sup>16</sup>, Shelter is unable to locate any enabling framework and or evidence based assessment in the exhibited documentation which includes the Planning Report and or its conclusions any or any supporting technical report in the appendices and or their conclusions to justify strategic and site specific merit by the Master Plan in relation to social and affordable housing.

Social and affordable housing outcomes are only achievable where an effective enabling framework set standards for implementation. Upon examination, the technical assessment for social and affordable housing in the exhibited Master Plan<sup>17</sup> amounts to:

*The Master Plan has the capacity to accommodate ~10,000 residential dwellings. In accordance with NSW Government policy a proportion of the residential dwellings will be affordable housing.*

Shelter notes there is no Master Plan informed response to considerations of social and affordable housing need and or assessment of any kind associated with the significant densification, population influx, total housing capacity and economic drivers from major projects and infrastructure associated with the Western Sydney Aerotropolis in the exhibited Master Plan<sup>a</sup>. Further, there is no adequate Master Plan response in the exhibited Master Plan to include an appropriate component of housing affordable for very low to moderate income earners.

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<sup>12</sup> Western Parkland Authority Australia Pty Ltd (October 2023). Planning Report – Western Parkland City Authority. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

<sup>13</sup> SGS Economics and Planning (October 2023). Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF)

<sup>14</sup> Western Parkland Authority Australia Pty Ltd (October 2023). Planning Report – Western Parkland City Authority. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

<sup>15</sup> NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

<sup>16</sup> NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

<sup>17</sup> NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

The, as exhibited Master Plan,<sup>18</sup> reveals a lack of due regard for adequate and informed consideration of critical social and affordable housing provision and the lack of any statutory mechanisms and or procedures to realise this vision cannot result in an equitable outcome shared by all parts of a new community, positioned to be the major centre within the Aerotropolis Core Precinct, within the wider Western Sydney Aerotropolis<sup>19</sup>.

Further, adequate social and or affordable housing responses for a population of over 15,000 based on housing targets<sup>20</sup>, which amounts to approximately 64% of the wider Aerotropolis precinct<sup>21</sup>, within the key anchor centre for the development of the Aerotropolis and broader Western Sydney<sup>22</sup> is not just a welfare policy response given the 20,000 + jobs<sup>23</sup>, (50% of the Aerotropolis Core employment target<sup>24</sup>) as a key employment centre to Western Sydney<sup>25</sup>.

**The Bradfield City Centre Master Plan as exhibited<sup>26</sup> is incapable of creating a regulatory framework and any pre-requisite conditions to embed delivery of social and affordable housing within the Bradfield City Centre.**

**Further, the Bradfield City Centre Master Plan as exhibited<sup>27</sup> provides no rationale to evaluate what proportion of the 10,000 dwellings should apply as affordable for low to moderate income households within the Bradfield City Centre.**

**The exhibited Master Plan is fundamentally flawed without a coherent statutory planning framework to realise a vision to compel government to act to address social and affordable housing needs and cannot be viewed as promoting the public interest.**

**A strong objection is raised to the exhibited Master Plan which should be refused in its current form.**

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<sup>18</sup> NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from:

<https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

<sup>19</sup> SGS Economics and Planning (October 2023). Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF)

<sup>20</sup>WPCA (October 2023). Bradfield City Centre Master Plan Application Housing Strategy – Summary Statement. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/29.+Appendix+BB+-+20231020+Housing+Strategy+Statement+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/29.+Appendix+BB+-+20231020+Housing+Strategy+Statement+Report.PDF)

<sup>21</sup> SGS Economics and Planning (October 2023) WPCA Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF)

<sup>22</sup> SGS Economics and Planning (October 2023). Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF)

<sup>23</sup> ibid

<sup>24</sup> SGS Economics and Planning (October 2023) WPCA Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF)

<sup>25</sup> ibid

<sup>26</sup> NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from:

<https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

<sup>27</sup> ibid

## 2. Key Issues

### 2a. Strategic Planning Framework

Shelter notes the Aerotropolis Masterplan has evolved out of earlier iterations to which it raised specific concerns in relation to affordable housing provision in both 2021 and 2022<sup>28</sup>. In the submissions, Shelter called for proactive commitments and actions by the NSW Government to provide social and affordable housing at a scale proportional to the growth envisaged, without which the private housing market will be unaffordable for essential workers and people on low or insecure wages<sup>29</sup>.

The current iteration of the Bradfield City Centre Master Plan exhibits changes to planning controls including to the exhibited SEPP (Precincts-Western Parkland City) 2021, Western Sydney Aerotropolis Precinct Plan and Western Sydney Aerotropolis DCP – Phase 2.

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<sup>28</sup> Shelter NSW Submission (2021) Submission on Initial Place-based Infrastructure Compact for the Western Parkland City. Retrieved from: <https://shelternsw.org.au/wp-content/uploads/2021/02/Shelter-NSW-Submission-PIC.pdf> and Shelter NSW Submission (31 March 2022). Submission on the Draft Western Parkland City Blueprint. Retrieved from: [https://shelternsw.org.au/wp-content/uploads/2022/04/220331\\_WPC\\_Blueprint\\_Submission\\_SM\\_template-1.pdf](https://shelternsw.org.au/wp-content/uploads/2022/04/220331_WPC_Blueprint_Submission_SM_template-1.pdf)

<sup>29</sup> *ibid*



Shelter NSW's current submission primarily concerns itself with an assessment of the intent and merits of the Bradfield City Centre, and its capacity to effectively generate genuine social and affordable housing.

Shelter has reviewed the exhibited Master Plan<sup>30</sup> in detail but can find no adequate quantitative or qualitative assessment in any of kind for social and affordable housing provision in the exhibited documentation<sup>31</sup>. This is despite the significantly increased densification within the Bradfield City Centre within the Aerotropolis<sup>32</sup> which has the capacity to accommodate 10,000 residential dwellings.

Further, while it is appreciated from the exhibited Master Plan, *future analysis of data sets will need to be updated according to population projections and market demand for housing, refining the overall number of dwellings in the Aerotropolis*<sup>33</sup>, affordable housing will require pre-requisite conditions before it can be delivered and any proportion decided upon requires considered assessment alongside the details of the exhibited Master Plan<sup>34</sup>.

## 2b. Statutory Planning Framework

The Master Plan responses as exhibited need to adequately inform the objectives and requirements of the Bradfield City Centre (Aerotropolis) planning framework and hierarchy of plans to realistically leverage for much needed affordable housing to support the 'work near home' opportunity for all<sup>35</sup> as intended within the Bradfield City Centre. Findings show otherwise detailed as follows:

### Western City District Plan Planning Priorities assessment

The Western City District Plan sits under the Greater Sydney Region Plan: A Metropolis of Three Cities and strategically sets out the housing and jobs targets for the area<sup>36</sup> detailed as planning priorities. The key objective for affordable housing for the Bradfield City Centre Master Plan is Planning Priority W5 described as providing housing supply, choice and affordability with access to jobs, services and public transport<sup>37</sup>.

<sup>30</sup> NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from:

<https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

<sup>31</sup> WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

<sup>32</sup> ibid

<sup>33</sup> WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

<sup>34</sup> NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from:

<https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

<sup>35</sup> WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

<sup>36</sup> SGS Economics and Planning (October 2023) WPCA Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/16.+Appendix+O+.+20231020+Economic+Strategy+and+Impact+Assessment.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+.+20231020+Economic+Strategy+and+Impact+Assessment.PDF)

<sup>37</sup> WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)



Importantly, as stated in the planning report<sup>38</sup> the Master Plan is considered consistent with the intention of Planning Priority W5. The stated adequacy relies on future development application opportunities providing key affordable housing development to support the population with further information provided in Housing Strategy Statement Report<sup>39</sup>.

Shelter asserts “key affordable housing development” is not necessarily a technical reference to affordable housing as defined by the EP&A Act 1979, as amended (the Act) for very low to moderate income households, being such households as prescribed by the regulations or as provided for in an environmental planning instrument. It follows then, that a clear and unambiguous explicit reference to affordable housing as defined by the Act is required to distinguish it from commonly held notions of ‘housing affordability’. This distinction is imperative to rule out any degree of uncertainty prior to establishing Master Plan response adequacy. Consistency with the Planning Priority W5 remains unresolved without such necessary clarification.

Shelter also notes the Executive Summary to the Housing Strategy – Summary Statement refers to diverse and affordable housing in proximity of employment and transport,<sup>40</sup> but again fails to provide a clear and unambiguous reference to affordable housing as defined by the Act. As stated above, without an explicit reference to affordable housing defined by the Act the reference in the Housing Strategy remains ambiguous. Further, while a reference to social and affordable housing appears in the text of the Housing Strategy related to tenure of the 10, 000 apartments there is no assessment.

Moreover, the projected future community provided by the WPCA Master Plan Social Infrastructure Strategy in support of the Bradfield Master Plan anticipates the Bradfield City Centre to be characterised by students, young workers, single person households, Aboriginal and Torres Strait Islander people and Culturally and linguistically diverse groups<sup>41</sup>

While recommendations are tabled for aged care and health facilities, as well as facilities and services that facilitate social interaction and community connections (community centres cultural facilities and sport and recreation facilities) to increase social cohesion and build social resilience within the community,<sup>42</sup> the GHD report<sup>43</sup> makes no recommendation for social infrastructure as social and affordable housing to be delivered through the Bradfield City Centre Master Plan. Importantly, this is despite prospective demand generated by both the Bradfield City Centre Master Plan site itself as well as the wider Aerotropolis and Western Parkland City as the Bradfield City grows<sup>44</sup>.

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<sup>38</sup> *ibid*

<sup>39</sup> *ibid*

<sup>40</sup> Macroplan (October 2023). Bradfield City Centre Master Plan Application Housing Strategy – Summary Statement. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/29.+Appendix+BB+-+20231020+Housing+Strategy+Statement+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/29.+Appendix+BB+-+20231020+Housing+Strategy+Statement+Report.PDF)

<sup>41</sup> GHD (October 2023). Bradfield City Centre Master Plan Application WPCA Master Plan Social Infrastructure Strategy. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/15.+Appendix+N+-+20231020+Social+Infrastructure+Strategy+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/15.+Appendix+N+-+20231020+Social+Infrastructure+Strategy+Report.PDF)

<sup>42</sup> *ibid*

<sup>43</sup> *ibid*

<sup>44</sup> *ibid*

Shelter notes the significant contribution over the next 40 years to 2056 from:

- a completely new city centre (114 ha in size) earmarked for establishment in the early stages to enable connections with surrounding strategic centres within the Aerotropolis precinct<sup>45</sup>
- approximately 64% of the wider Aerotropolis precinct population<sup>46</sup> which includes 50% of the Aerotropolis Core employment target<sup>47</sup>.
- significant growth forecast, using a 15 year moving target for capacity, associated with the zoned capacity up to 54,000 apartments in the eight Western Parkland City LGAs outside of the Western Sydney Area Aerotropolis<sup>48</sup> (**Figure 2**).

The drivers influencing growth cannot possibly be expected to comprehensively inform the adequacy of the Bradfield City Centre Master Plan responses without any regulatory framework with power to have an effective impact on social and affordable housing provision factored in.

Further, Shelter notes the findings of performance of affordable housing clauses and planning agreements of the eight (8) LGAs outside of the Western Sydney Area Aerotropolis (**Table 1 of Appendix A**) including Blue Mountains, Camden, Campbelltown, Hawkesbury, Liverpool, Penrith and Wollondilly and Fairfield (**Figure 2**) will directly impact their ability to absorb social and affordable housing need associated with the Bradfield City Centre Master Plan in an effort to address the inconsistency within the exhibited Master Plan.

The findings in tracking performance of planning mechanisms and procedure and other sources of the eight councils (**Table 1 of Appendix A**) reveals considerable variability in the type, degree and weight of instruments and procedures given to enhance capacity for affordable housing growth used by each council. Consequently, the potential for local councils to play an effective role in fostering social and affordable housing in the Bradfield City Centre of the Aerotropolis is lacking.

Shelter asserts comprehensive regulatory arrangements to effectively support growth and deal with those lower income households who will be disproportionately impacted by housing affordability issues, including essential workers, needs to be addressed through the exhibited Master Plan.

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<sup>45</sup> WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

<sup>46</sup> SGS Economics and Planning (October 2023) WPCA Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/16.+Appendix+O+--+20231020+Economic+Strategy+and+Impact+Assessment.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+--+20231020+Economic+Strategy+and+Impact+Assessment.PDF)

<sup>47</sup> SGS Economics and Planning (October 2023) WPCA Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/16.+Appendix+O+--+20231020+Economic+Strategy+and+Impact+Assessment.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+--+20231020+Economic+Strategy+and+Impact+Assessment.PDF)

<sup>48</sup> Macroplan (October 2023). Bradfield City Centre Master Plan Application Housing Strategy – Summary Statement. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/29.+Appendix+BB+--+20231020+Housing+Strategy+Statement+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/29.+Appendix+BB+--+20231020+Housing+Strategy+Statement+Report.PDF)

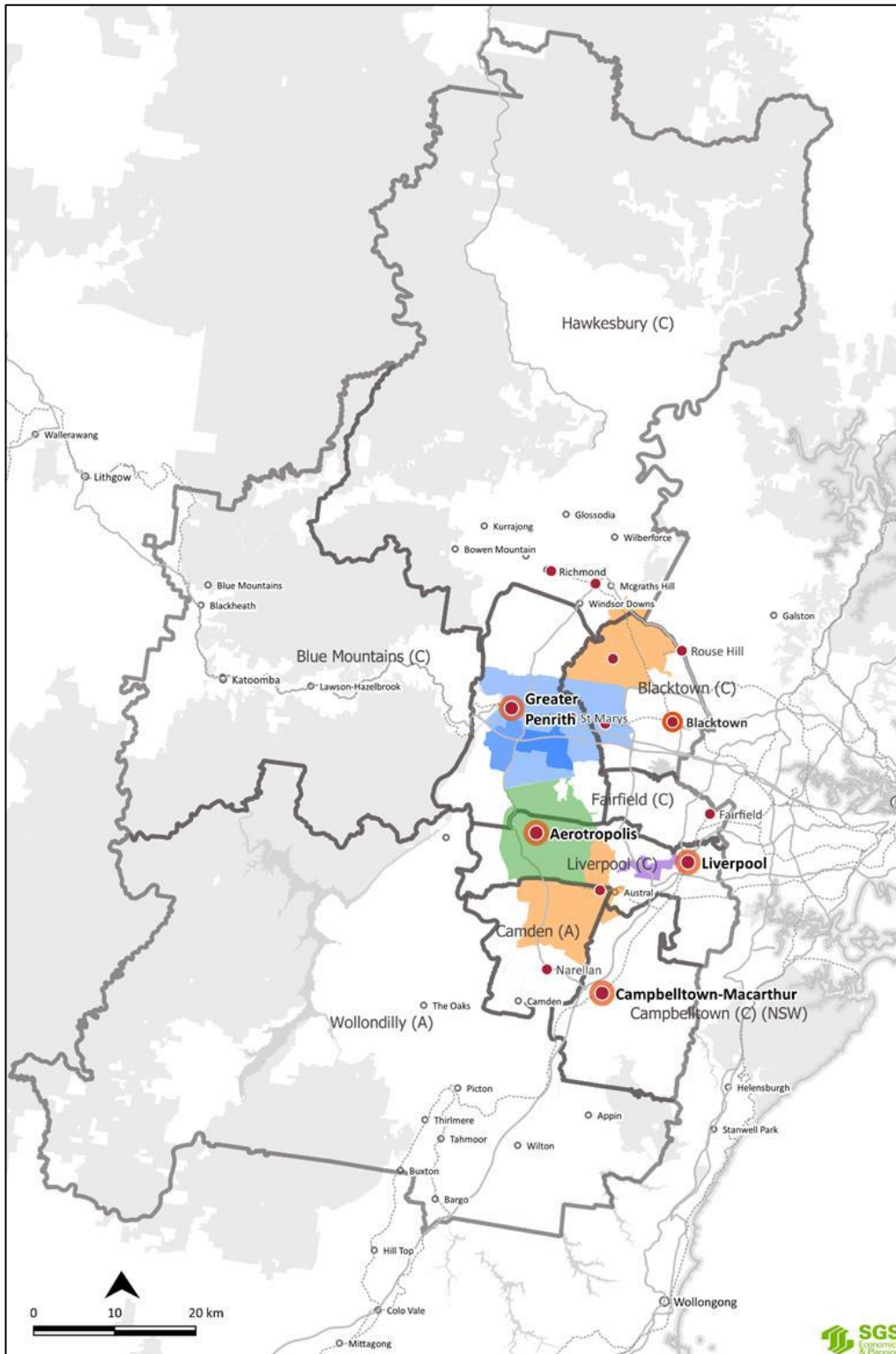


Figure 2: Strategic context of the Bradfield City Centre, Bradfield within the Western Sydney Aerotropolis (Liverpool LGA) highlighting the 8 LGAs

**Source:** SGS Economics and Planning (October 2023) WPCA Bradfield City Centre Master Plan Application Economic Strategy and Impact Assessment Report. Retrieved from [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/16.+Appendix+O+-+20231020+Economic+Strategy+and+Impact+Assessment.PDF)

## Western Sydney Aerotropolis Plan (WSAP)

Shelter notes the EP&A Regulation requires a statement of consistency with the WSAP as it provides the overarching strategic direction for the development of land in the Aerotropolis, aligning it to the Greater Cities Commission Plan: A Metropolis of Three Cities and the Western City District Plan (WCDP). The purpose and alignment of the WSAP has been considered because it informs the development of a precinct plan and Bradfield City Centre Master Plan in the Aerotropolis.

An overview of the key principles / guiding directions as reported in Table 8 of the exhibited Planning Report<sup>49</sup> finds the Master Plan is overall consistent with the key considerations and strategic outcomes for the vision and social and cultural infrastructure of the Aerotropolis Core Precinct.

However, in the absence of any assessment of social and affordable housing need and or provision in any of the exhibited Planning Report and or technical reports in the accompanying documentation<sup>50</sup> for the Bradfield City Centre Master Plan Shelter questions how the Master Plan can satisfactorily address the key principles and guiding directions for the WSAP.

Further, Shelter points to a factual error in the Housing Strategy Statement Summary report which states the Bradfield City Centre has the capacity to deliver 10,000 apartments making it a significant contribution to the total supply and diversifying housing supply within the Aerotropolis consistent with Objective (d) of the WSAP.

Objective (d) of the WSAP does not exist. Objective (d) relates to the EP&A Act 1979 requirement for affordable housing.

Importantly, affordable housing as defined by the Act concerns itself with income band eligibility to support very low (50% of the median wage), low (between 50% - 80% of the median wage) and moderate (80% 120% of the median wage) income (tenanted) households. In effect, this is housing targeted to support the lowest 40% of income earners, including essential workers forecast to come from the west and other parts of Sydney<sup>51</sup> who will provide a major source of employment for the Aerotropolis<sup>52</sup>.

## Environmental Planning and Assessment Act

Shelter notes Table 9 of the Planning Report<sup>53</sup> sets out the statutory planning framework for NSW. This includes social considerations as part of the decision making processes for assessment by the consent authority. Section 1.3 Objective (d) of the Act is specific to

<sup>49</sup> WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

<sup>50</sup> NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from:

<https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

<sup>51</sup> WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

<sup>52</sup> ibid

<sup>53</sup> WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)

promote the delivery and maintenance of affordable housing. The Master Plan response reads Bradfield City Centre will provide affordable housing options to facilitate the ‘work near home’ opportunity for all.

Shelter notes authority exists for the Master Plan to implement affordable housing in any of the exhibited documentation for the Bradfield City Centre Master Plan<sup>54</sup>. And specifically, that the consent authority must have regard to other applicable environmental instruments that apply to the proposed development.

The use of a generic name convention “NSW Policy”<sup>55</sup> to which affordable housing will be assessed does not in itself compel the consent authority (DPHI) to enable equitable housing outcomes. Rather, the lack of details over expectations for affordable housing provision to inform development of the Bradfield City Centre Master Plan lacks transparency. Critically, it will have far reaching effects for not only the inclusion of affordable housing within the Bradfield City Centre but more broadly, for other functional planning mechanisms and procedures including local planning schemes in the surrounding 8 LGAs to the Western Sydney Aerotropolis which is clearly inadequate in the public interest.

### **Other relevant SEPPs: SEPP (Housing) 2021**

Shelter can find no listing for the SEPP (Housing) 2021 in either Table 12 of the Planning Report and or any supporting documentation<sup>56</sup>. Notwithstanding, Shelter is aware the consent authority must have regard to other application environmental planning instruments that apply to the proposed development. Shelter notes social and affordable housing is clearly insufficient without a supporting SEPP.

Further, the SEPP (Housing) 2021 sets out both a reportable definition of affordable housing defined by the Act and state wide standards to produce equity accountability and transparency over implementation of social and affordable housing outcomes for the Bradfield City Centre Master Plan and more broadly, Aerotropolis.

### **Western Parkland City SEPP**

The Western Parkland City SEPP which aligns with the aims of the WSAP and Aerotropolis SEPP sets out the zoning for the Bradfield City Centre Master Plan. While Shelter understands affordable housing will be permissible within the Bradfield City Centre from the planning report<sup>57</sup> there is no explicit definition for affordable housing defined by the EP&A Act 1979 or reference in either the aims and or design and intent, listed as a permissible use in the zoning table and or has no key development standards to guide affordable housing development considerations a consent authority has to have to regard to.

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<sup>54</sup> NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

<sup>55</sup> NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

<sup>56</sup> NSW Government (2024). Bradfield City Centre Master Plan. Retrieved from: <https://www.planningportal.nsw.gov.au/draftplans/exhibition/bradfield-city-centre-master-plan>

<sup>57</sup> *ibid*

### 3. Public Interest

The Planning Report concludes the Master Plan is within the public interest. In recognition of the absence, insufficient and or inadequate Master Plan responses for social and affordable housing outcomes, this is a fundamentally flawed view which cannot be reconciled by the as exhibited Master Plan and accompanying supporting technical reports.

Social and affordable housing is in the public interest. Social and affordable housing creates a socially diverse residential population representative of all income groups, when created through well considered government intervention, and, is held in perpetuity. Such a critical action embeds a sustainable future for all within communities. It is therefore incumbent that minimum standards (a negotiated planning agreement) to acquire affordable housing as a public benefit is part of the Bradfield City Centre Master Plan through the development approval process before the DPHI for consideration to shift the inequity.

Affordable housing is recognised as a material public benefit by up to 60% of all councils across Greater Sydney (**Table 1 in Appendix A**). The lack of an advertised functional scheme (AHCS) to secure developer contributions for affordable housing through the development process, while ideal, does not prevent the NSW Government from making use of a negotiated planning agreement for affordable housing as an additional public benefit. It is a viable solution to the current administrative and procedural barrier to incentivise supply of affordable housing held in perpetuity within the Bradfield City Centre.

Shelter asserts any negotiated planning agreement needs to reflect a percentage that acknowledges the 114ha Bradfield City Centre site is commonwealth government land. Shelter notes the NSW Government has already committed to delivering 30% social and affordable housing on its own land, where it is being developed for residential housing.

Stronger government intervention to provide affordable housing is a high priority in the Bradfield City Centre. The DPHI has the ability to leverage for housing affordability not only based on the share of forecast growth, total housing capacity, major development and government owned greenfield opportunity but one which comprehensively encompasses the whole housing spectrum, particularly those lower income (households unaccounted for in the exhibited Master Plan application as made. Such an effective response to social and affordable housing is achievable where political circumstances permit.



Further, without negotiating for implementation of affordable housing held in perpetuity through a negotiated planning agreement, time limited consents cannot resolve the eventual loss of affordable housing for those most in need as properties return to the private rental market.

Time limited consents for affordable housing cannot have an effective or enduring impact to help those most in need beyond a limited timeframe without the consent authority (in this case DPHI) leveraging for effective implementation of affordable housing held in perpetuity.

Otherwise, the net result is a return of those dwellings and their lower income tenants to the private rental market. Housing affordability issues will continue as a critical and intractable problem for those lower income (rental) households (those most in need) without this safety net.

## 4. Conclusion

While the exhibited Master Plan considers affordability needs of buyers, renters and owners who make up the housing market for the future Bradfield City Centre it fails, completely, to consider those for whom the private housing market consistently fails: those requiring diverse and secure affordable housing (held in perpetuity) that is well located near employment opportunities and transport<sup>58</sup>.

Shelter is calling for housing outcomes that are genuinely offered to a mix of income levels, household types and cultural groupings with far reaching equitable outcomes that can be shared by generations to come within the new Bradfield community of the Western Sydney Aerotropolis.

The public interest requires a comprehensive picture of housing affordability which delivers certain social and affordable outcomes for lower income households, not just a picture based on housing capacity, as proposed. Essential to this is a functional planning framework for the as exhibited Bradfield City Centre Master Plan which provides for adequate social housing and appropriate levels of affordable housing (held in perpetuity) within the Bradfield City Centre, as both will have an enduring public benefit within the local community of the Aerotropolis for generations to come.

Shelter advocates for a recommendation for refusal of the exhibited Master Plan in direct response to the lack of evidence to make explicit provisions to provide for, maintain and regulate matters relating to social and affordable housing in the, as exhibited, Draft Bradfield City Centre Master Plan.

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<sup>58</sup> WSP Australia Pty Ltd (October 2023). Bradfield City Centre Master Plan Application, Planning Report. Retrieved from: [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/01.+20231020+Planning+Report.PDF](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/01.+20231020+Planning+Report.PDF)



Please contact me at [pilar@shelternsw.org.au](mailto:pilar@shelternsw.org.au) if you require any further clarification / would like to discuss any of the details within the above submission.

# Appendix A

Table 1: Local Government affordable housing delivery

LGA – Greater Metro Sydney	Instrument Clauses / definition of AH	AHCS / Plan	Planning Agreement Register that includes VPA with an AH contribution	AH dwellings
Blue Mountains Council	<p>Blue Mountains LEP 2015  <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-2015-0829">https://legislation.nsw.gov.au/view/html/inforce/current/epi-2015-0829</a></p> <p>BM LEP 2015:            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  <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-2005-0633">https://legislation.nsw.gov.au/view/html/inforce/current/epi-2005-0633</a></p> <p>BM LEP 2005            Cl 12 – Principal Objectives of the Plan – to promote affordable housing options</p> <p>Blue Mountains LEP 1991  <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0683">https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0683</a></p>	<p>Local Housing Strategy 2020  <a href="https://www.bmcc.nsw.gov.au/sites/default/files/docs/Blue%20Mountains%20Local%20Housing%20Strategy_March%202020.pdf">https://www.bmcc.nsw.gov.au/sites/default/files/docs/Blue%20Mountains%20Local%20Housing%20Strategy_March%202020.pdf</a></p> <p>No adopted Affordable Housing Strategy</p>	<p>No AH in VPAs  <a href="https://www.bmcc.nsw.gov.au/development/planning-rules/infrastructure-contributions-planning-agreements">https://www.bmcc.nsw.gov.au/development/planning-rules/infrastructure-contributions-planning-agreements</a></p> <p>Note</p>	No

Camden Council	Camden LEP 2010 <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-2010-0514">https://legislation.nsw.gov.au/view/html/inforce/current/epi-2010-0514</a>	Local Housing Strategy October 2020	No AH in VPAs <a href="https://www.camden.nsw.gov.au/strategic-planning/section-7-11/voluntary-planning-register/">https://www.camden.nsw.gov.au/strategic-planning/section-7-11/voluntary-planning-register/</a>	No.
Campbelltown Council	Campbelltown LEP 2015 <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-2015-0754">https://legislation.nsw.gov.au/view/html/inforce/current/epi-2015-0754</a>  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).	Local Housing Strategy Endorsed by Campbelltown City Council 29 September 2020	<a href="https://www.campbelltown.nsw.gov.au/Build-and-Develop/Planning-Policies-and-Controls/Planning-Agreement-Register">https://www.campbelltown.nsw.gov.au/Build-and-Develop/Planning-Policies-and-Controls/Planning-Agreement-Register</a>	Yes AH Units
Fairfield City Council	Fairfield LEP 2013 <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0213">https://legislation.nsw.gov.au/view/html/inforce/current/epi-2013-0213</a>	Fairfield City Local Housing Strategy 2020	Fairfield Planning Agreement <a href="https://www.fairfieldcity.nsw.gov.au/Planning-and-Building/Planning-and-Policies/Planning-Agreements">https://www.fairfieldcity.nsw.gov.au/Planning-and-Building/Planning-and-Policies/Planning-Agreements</a> However, the register of planning agreements on exhibition, executed and or concluded do not show any planning agreements where AH has been acquired.	Yes.
Hawkesbury	Hawkesbury LEP 2012 <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-2012-0470">https://legislation.nsw.gov.au/view/html/inforce/current/epi-2012-0470</a> 1.2 Aims of Plan	Hawkesbury Local Housing Strategy August 2020	<a href="https://www.hawkesbury.nsw.gov.au/plan-and-build/planning-policies/planning-agreements">https://www.hawkesbury.nsw.gov.au/plan-and-build/planning-policies/planning-agreements</a>	No AH

Liverpool Council	<p>Liverpool LEP 2008  <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-2008-0403">https://legislation.nsw.gov.au/view/html/inforce/current/epi-2008-0403</a></p> <p>Liverpool Plains LEP 2011  <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-2011-0644">https://legislation.nsw.gov.au/view/html/inforce/current/epi-2011-0644</a></p>	Liverpool Local Housing Strategy July 2021	<a href="https://www.liverpool.nsw.gov.au/development/liverpools-planning-controls/planning-agreements">https://www.liverpool.nsw.gov.au/development/liverpools-planning-controls/planning-agreements</a>	No AH
Penrith Council	<p>Penrith LEP 1991 (Environmental Heritage Conservation (1991 EPI 674)  <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0674">https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0674</a></p> <p>Penrith LEP 1998 (Urban Land) (1991 EPI 9)  <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-1999-0009">https://legislation.nsw.gov.au/view/html/inforce/current/epi-1999-0009</a>  Cl. 9. Zone objectives and dev control table</p>	Local Housing Strategy 2022	<a href="https://www.penrithcity.nsw.gov.au/building-development/planning-zoning/planning-controls/voluntary-planning-agreements">https://www.penrithcity.nsw.gov.au/building-development/planning-zoning/planning-controls/voluntary-planning-agreements</a>	Yes AH.
Penrith Council	<p>Penrith LEP 2010  <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-2010-0540">https://legislation.nsw.gov.au/view/html/inforce/current/epi-2010-0540</a>  Zone R4 High Density Residential</p> <p>Penrith LEP No. 201 (Rural Lands ) (1991 EPI 364)</p>	Local Housing Strategy 2022		No AH

	<a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0364">https://legislation.nsw.gov.au/view/html/inforce/current/epi-1991-0364</a> Cl. 7.31 AH contributions  Penrith LEP No. 255 – Exempt and Complying Development (2000 EPI 122) <a href="https://legislation.nsw.gov.au/view/html/inforce/current/epi-2000-0122">https://legislation.nsw.gov.au/view/html/inforce/current/epi-2000-0122</a>			
Wollondilly Shire Council		Local Housing Strategy 2021	<a href="https://www.wollondilly.nsw.gov.au/planning-and-development/development-contributions/planning-agreements-register/">https://www.wollondilly.nsw.gov.au/planning-and-development/development-contributions/planning-agreements-register/</a>	No.