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22 May 2020

Mr Matthew Stewart
General Manager
City of Canterbury Bankstown
Attn: Community Engagement
PO Box 8
Bankstown NSW 1885

Dear Mr Stewart

Planning Proposal for Consolidated Local Environmental Plan
Draft Local Housing Strategy
Draft Employment Land Strategy
Draft Affordable Housing Strategy
Draft Amendment to Planning Agreement Policy

The Property Council welcomes the opportunity to provide comments to Canterbury Bankstown City Council (**Council**) on the above package of draft policies.

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes.

Given the unusual circumstances faced by the economy due to COVID-19, it is critical that support be provided to the construction and housing industry - and these strategies and policy changes should be framed with that in mind. We would encourage Council to give careful consideration to accelerating the next stage of its planning review being the detailed planning work for Bankstown CBD and Campsie town centre. It is vital that this work be brought forward to encourage new development projects to commence and support jobs in our economy

Further, we would support Council taking action needed to secure funding from the State Government to allow this work to commence as soon as possible.

Should you have any questions in respect of the content of this submission, do not hesitate to contact Troy Loveday, Senior Policy Advisor, Troy Loveday on 0414 265 152 or tloveday@propertycouncil.com.au

Yours sincerely

A handwritten signature in blue ink, appearing to read "Adina Cirson".

Adina Cirson
Executive Director
Property Council of Australia

**Planning Proposal for Consolidated Local Environmental Plan for
Canterbury Bankstown City**

The Property Council understands that Council is one of eighteen (18) councils in Greater Sydney that are participating in the Accelerated LEP Review Program. The identification of certain local government areas for accelerated translation of the relevant District Plan during 2020 (one year ahead of the remaining 15 councils in Greater Sydney) was appropriate. Canterbury Bankstown's participation in this program is also appropriate.

Council has been given financial assistance from the NSW Government to complete a number of milestones under the program. The completion of this Planning Proposal (PP_2019_CBANK_005) is one such milestone. Finalisation of Council's Local Strategic Planning Statement (LSPS) and Local Housing Strategy (LHS) being other important steps in this program.

We note that page 5 of Council's Planning Proposal states "In February 2020, the Department of Planning, Industry and Environment issued a Gateway Determination. According to the Gateway Determination, Council may exhibit the planning proposal provided it precludes any changes to residential land uses and development standards, and it precludes the rezoning of any land other than those included in current land use strategies". The Planning Proposal goes on to say "the intended outcome of this planning proposal is to achieve a consistent land use planning framework for the Canterbury Bankstown Local Government Area by implementing key actions of current land use strategies".

Section 3.8 of the Environmental Planning and Assessment Act 1979 requires a Planning Proposal Authority, when preparing a planning proposal under section 3.33, to give effect to any district strategic plan applying to the local government area to which the planning proposal relates. Also as soon as practicable after a district strategic plan is made, the relevant council must review its local environmental plan for the area and prepare such planning proposals under section 3.33 as are necessary to give effect to the district strategic plan.

It is disappointing that more than two years since the Regional Strategic Plan and Southern District Plan were endorsed by the NSW Government and six months since the public exhibition of Council's draft LSPS, it is not in a position to exhibit a planning proposal to "give effect" to the important need to boost housing supply for residents of the City of Canterbury Bankstown. Council should set out its planned timeframe for completion of the next phase of the LEP, being the planning changes identified in the draft Local Housing Strategy.

Housing Targets

The Greater Sydney Commission (GSC) issued Council with a letter of support on 16 March 2020 which included a 6-10 year housing target between 10,500 and 12,500 additional dwellings. This involves the production of more than 2,100 additional dwellings annually.

The South District Plan imposed a 0-5 year housing target upon Council of 13,250 additional dwellings from 2016/17 to 2020/21 (being production of about 2,650 new dwellings each year). In the first three years of this period (2016/17 to 2018/19 there has been 6,395 dwellings completed in the Canterbury Bankstown LGA). Council should take necessary action to ensure that its policy settings are appropriate for the continuation of new housing supply at or above this level.

The Property Council acknowledges the substantial effort Council has made towards the preparation of this Planning Proposal. Harmonisation of the planning controls of two separate councils is very complex and can be very controversial.

General Comments on Planning Proposal

The intent of the current Planning Proposal is to:

- Combine and harmonise Bankstown LEP 2015 and Canterbury LEP 2012 into a Consolidated Local Environmental Plan to produce a single set of planning rules for the Canterbury Bankstown Local Government Area,
- Strengthening the function of Yagoona, Revesby and Padstow as local centres and enabling the future redevelopment of land within a reasonable walking distance of the railway station for shop top housing, residential flat buildings and multi dwelling housing.
- Strengthening the function of Greenacre as a local centre and enabling the future redevelopment of land within a reasonable walking distance of the commercial main street for shop top housing, residential flat buildings and multi dwelling housing,
- Strengthening the function of Birrong, East Hills, Panania and Regents Park as Small Village Centres and enabling the future redevelopment of land within a reasonable walking distance of the railway station for shop top housing, residential flat buildings and multi dwelling housing,
- Retaining and managing industrial lands and other employment lands to meet the employment needs of the city and the wider district,
- Reinforcing the low-density character of the suburban neighbourhoods,
- Achieving better standards of design quality,
- Encouraging a high quality and activated public domain with good solar access,
- Protecting areas of high biodiversity significance,
- Strengthening the function of existing open spaces that serve community and visitor needs,
- Enhancing waste and resource recovery activities at the Kelso Waste Precinct, and
- Minimising risk to the community in areas subject to environmental hazards by restricting development in sensitive areas.

These actions are generally considered to be appropriate, and in most cases, supported.

It is noted the Gateway determination issued to Council by the Department of Planning, Industry and Environment on 20 February 2020 required Council to exclude a number of matters from the Planning Proposal. These included proposals to rationalise the R2 Low Density Residential and R3 Medium Density Residential zones of the former Canterbury and former Bankstown councils, introduction of special character areas, amendments to dual occupancy controls and prohibition of medium density housing in the R2 Low Density Residential Zone. We understand these changes will be considered as part of future planning proposals.

Design Quality

The planning proposal seeks to include a provision (clause 6.14) to improve design outcomes across the City by applying design quality considerations into the local environmental plan. It is intended to raise the design quality of certain developments (including mixed use developments, shop top housing, commercial premises, industrial buildings, warehouses, places of worship and registered clubs). The provisions would apply to both new development and significant alterations and additions that are visible from the public domain. In applying the clause, Council's assessment of a prescribed development application would need to consider 8 design-related matters identified in subclause (3).

The introduction of this clause will extend what is currently considered in the assessment of residential apartment development to other major developments that may have significant visual impacts. While it may be excessive to apply this clause to industrial and warehouse development,

we anticipate that the Council will provide prospective applicants with advice and guidance regarding the design standards they are seeking to achieve for industrial and warehouse developments.

Local Area Plans

Council has completed a significant body of strategic planning work in 2016 that related to areas within the former City of Bankstown. A planning proposal giving effect to these strategies was submitted to the Department of Planning, Industry and Environment in 2016 but was later withdrawn.

The four (4) Local Area Plans that were prepared and adopted by Council apply to the following parts of the City:

- North Central – Yagoona & Birrong
- North East – Greenacre & Punchbowl
- South East – Revesby & Padstow
- South West – East Hills & Panania

It is intended to implement these plans as part of the current planning proposals. made recommendations regarding opportunity for land use rezoning in the town centres of these suburbs and supported some uplift in height and FSR. These changes strengthen the function of these centres and enable the future redevelopment of land within close proximity of railway stations and local services.

The proposed amendments are welcome and will have a positive impact in terms of increasing supply of housing and employment in those centres.

Draft Local Housing Strategy

We welcome the opportunity to provide comments to Council on the Canterbury Bankstown Draft Housing Strategy (draft Strategy) released for public consultation.

It is noted that the population of the City of Canterbury Bankstown is expected to grow by around 44.3% in the next 20 years to reach 500,000 by 2036. The draft Strategy has appropriately recognised the need for housing to be delivered to meet the increased population.

Part 4 of the draft LHS provides an analysis of future housing demand for Canterbury Bankstown based on historical trends, projected population growth and the implications of planned infrastructure delivery (including the Sydenham to Bankstown Metro). This section has attempted to project future housing needs for the LGA. An estimated need of 50,000 additional dwellings to 2036 has been adopted by Council in the draft LHS.

The draft Housing Strategy has proposed the distribution of additional housing between centres and other areas as follows:

Centres	Non centres
Bankstown City Centre – 12,500 (25%) Campsie Town Centre – 5,600 (11%) 9 Local Centres throughout LGA - 10,100 (20%) 12 Village Centres throughout LGA – 9,100 (18%) 11 Small Village Centres throughout LGA – 2,600 (5%)	Suburban areas distributed throughout LGA – 10,100 (20%)
39,900 (80%)	10,100 (20%)

More than one third of Canterbury Bankstown's new growth over the next 20 years will be encouraged within the established centres of Bankstown and Campsie. A further third is expected to occur within the 21 local centres and village centres across the LGA. The identification of realistic and achievable housing targets to meet the community's future housing needs is appropriate and supported. It is important that these targets are tested and that the testing takes into account the actual development potential for each centre using existing and proposed planning controls and other variables including development costs and land values.

Council has proposed a staged program of developing masterplans for its key centres in a four (4) stage process as follows:

- Stage 1: the consolidation of existing LEPs and implementation of existing strategies,
- Stage 2: Bankstown and Campsie,
- Stage 3: Lakemba, Belmore and Canterbury, and
- Stage 4: Punchbowl, Wiley Park, Earlwood, Belfield, Croydon Park and other centres.

It is suggested that Council provide indicative timeframes for the completion of each of these important planning stages and when each masterplan will be translated into actual LEP amendments.

Part 6 of the draft LHS addresses housing priority areas including dwelling types for all stages of life and household types, accessible and adaptable housing, housing for indigenous Australians

and Build to Rent. It is appropriate that the draft LHS consider housing typologies for a wide mix of housing needs. Future planning controls need to be designed to ensure that there will be a diversity of housing types delivered for current and future members of the community.

Part 7 of the draft LHS identifies the eight (8) strategic directions that will deliver the Council's housing vision. The Strategic Directions are:

Strategic Direction	Property Council Response
<u>Strategic Direction 1: Deliver 50,000 new dwellings by 2036 subject to the NSW Government providing upfront infrastructure support</u>	The Property Council generally supports this strategic direction and welcomes Council's identification of a 20 year housing target that will be implemented through periodic revisions of Council's planning controls (Council-led planning proposals).
<u>Strategic Direction 2: Stage the delivery of new dwellings to address complex renewal issues affecting Canterbury Bankstown</u>	The Property Council generally supports Council undertaking a series of staged reviews to its planning controls to accommodate future growth.
<u>Strategic Direction 3: Focus at least 80% of new dwellings within walking distance of centres and places of high amenity</u>	The Property Council generally supports Council concentrating most of the new dwellings to be built in the city within walking distance of centres and places of high amenity.
<u>Strategic Direction 4: Ensure new housing in centres and suburban areas are compatible with the local character.</u>	The Property Council generally supports the concept of new housing in both centres and a suburban context being compatible with the local character. This must include allowing for local character to change over time as some areas experience renewal in their housing stock.
<u>Strategic Direction 5: Provide a choice of housing types, sizes tenures and prices, to suit each stage of life.</u>	The Property Council generally supports the provision of housing diversity including a wide range of housing types, sizes, tenures and price points to suite the diverse range of housing needs in the community.
<u>Strategic Direction 6: Design quality housing to maximise liveability and provide positive built form outcomes.</u>	The Property Council generally supports the improvement of housing design and liveability and Council is encouraged to consider how its DCP requirements can deliver this as well as increased design awareness and opportunities for more training for council staff and local architectural and building designers.
<u>Strategic Direction 7: Align the R2 and R3 zones in the former Canterbury LGA.</u>	The Property Council supports in-principle the alignment of the R2 and R3 zones between the areas zoned under Canterbury LEP 2012 and those under Bankstown LEP 2015. These changes should not result in a net loss of housing supply across the amalgamated council area.
<u>Strategic Direction 8: Urgently review dual occupancies in the suburban neighbourhoods.</u>	The Property Council supports in-principle a review of dual occupancy development in some suburban locations and whether their permissibility and design requirements are appropriate in all areas where they are currently allowed.

Draft Employment Land Strategy

We welcome the opportunity to provide comments to Council on the Canterbury Bankstown Draft Employment Lands Strategy (draft ELS) released for public consultation.

The City of Canterbury Bankstown has a strong local economy that supports more than 150,000 jobs and more than 38,000 businesses. Employment land uses within the City are located both in the strategic centres of Bankstown and Campsie as well as scattered throughout many suburban industrial precincts and neighbourhood centres.

Key economic locations within the city also include the Bankstown Health and Education Precinct and the Bankstown Airport and Milperra Industrial Area. These precincts have been identified in the Greater Sydney Commission's South District Plan.

The South District Plan has set jobs targets for the city's strategic centres. For Campsie a target of between 7,000 to 7,500 jobs to 2036 has been set and for Bankstown a target range of between 17,000 and 25,000 jobs applies.

The draft ELS provides a comprehensive examination of the City's business and industrial zones. It also considers the relevant (planning controls contained within the relevant LEP/DCP) that apply to those zones have been performing. There is also consideration of the need to harmonise some of the zones and planning controls between *Canterbury LEP 2012* and *Bankstown LEP 2015*.

Planning Control Review

The key recommendations of the draft ELS are:

1. *Broadening mixed-use development types in B1 Neighbourhood Centre and B2 Local Centre zones.*

Property Council Response – The ELS recommends allowing residential flat buildings (as mixed use development/shop-top housing) in these zones where a ground floor non-residential use is provided. This recommendation is appropriate and supported.

2. *Residential uses in B6 Enterprise Corridor Zones*

Property Council Response – The ELS is recommending prohibiting all residential uses from the B6 Enterprise Corridor zone. At present, residential flat buildings (as part of a mixed-use development) are permissible under Bankstown LEP 2015 and prohibited under Canterbury LEP 2012. In order to strengthen the employment quality of the zone, it is proposed that all residential uses be excluded. In some cases, it may be appropriate to make this change but in some transport corridors it may be appropriate for higher density residential use.

Notwithstanding the development of transport corridors, there may be other areas where this change may be more appropriate and we would welcome seeing what impact this change would have on housing supply in the city.

3. Consolidated tourist and visitor accommodation use

Property Council Response – The ELS has found that tourist and visitor accommodation as serviced apartments are permitted under Bankstown LEP's B1, B2, B4, B5 and B6 zones and under Canterbury LEP's B2 zone. It recommends that they be consolidated and limited to B2 Local Centre, B4 Mixed Use and B6 Enterprise Corridor zones under a new consolidated LEP. Serviced apartments are an appropriate land use in highly accessible locations and near services for visitors. This change is appropriate recommendation.

4. Protect employment lands and strengthen centres

Property Council Response – The ELS has recommended deterring shop top housing in B1 and B5 zoned centres along the city's major roads (Canterbury Rd, Georges River Rd, King Georges Rd, Punchbowl Rd and Hume Highway), which also serve as freight corridors and can be unsuitable to high density residential development due to excessive noise and other amenity impacts.

It is appropriate that residential development avoid locations with unacceptable amenity impacts. However, *State Environmental Planning Policy No 65*, the *Apartment Design Guide* and *Development Near Rail Corridors and Busy Roads – Interim Guideline (2008)* provide guidance for development in these locations. We would not support this change as it would remove several considerable areas of future housing supply from the city.

5. Support urban services land particularly around strategic assets

Property Council Response – The ELS has found that there is insufficient provision of urban services (retail, childcare and personal services) in the major employment zones. The absence of conference facilities and business services in proximity to the Chullora Business Park has also been observed. The ELS recommends reviewing permitted uses in the city's industrial zones to permit activities such as convenience retail and childcare but cap the area and number of these uses so as not to support out of centre development. This recommendation is sensible and, provided it is implemented in a way that does not compromise the ability for industrial uses to operate, would be supported.

6. Density controls across the LEPs

Property Council response – The ELS has highlighted the absence of any FSR limits for sites for local and neighbourhood zones under Canterbury LEP 2012 and a mismatch between the FSR and Height of Building requirements for the Yagoona and Chester Hill centres under Bankstown LEP 2015.

The ELS proposes setting a maximum FSR for 6 local centres within in the former Canterbury LGA (Hurlstone Park, Campsie, Belmore, Lakemba, Wiley Park and Punchbowl) as part of the masterplanning process associated with the Sydney Metro development. In respect of the centres under Canterbury LEP 2015, the ELS recommends setting a maximum FSR that is achievable under the current building height limit.

Both these changes are appropriate under the circumstances and supported.

7. Minimum lot width controls within the DCP (overcoming land fragmentation)

Property Council Response – The ELS has identified variations in minimum lot width for commercial zones between the development control plans (DCP) for the former Canterbury LGA and the former Bankstown LGA.

Location	Required Lot Width
Former Canterbury LGA (Canterbury DCP 2012)	B1 & B2 zones – 18m B5 zone – 30m
Former Bankstown LGA (Bankstown DCP 2015)	Mixed use – 26 metres

The ELS is recommending that these requirements be reviewed when a single consolidated DCP is prepared and suggests a more tailored approach to minimum lot width reflecting the dominant lot width of each centre would better address the issue of land fragmentation reducing redevelopment.

A lot width of 10 metres is recommended for testing for the commercial/retail centres along the future Sydney Metro line given their close proximity to reliable transport and it may stimulate more redevelopment due to the difficulty in consolidating sites due to fragmented land ownership. This approach is a positive outcome and would be supported.

It is not clear what is proposed for other centres such as Padstow, Revesby, Panania, Narwee, Belfield, Yagoona, Greenacre, Sefton and Chester Hill.

The ELS is recommending a review of residential accommodation outside of the centres along major roads and therefore the need to set a minimum lot width would need to be reviewed. The Property Council does not support the broad bush prohibition of residential accommodation along all main road corridors throughout the LGA. There may be certain areas where housing is inappropriate, but they should be the exception rather than the rule.

8. Centres hierarchy

Property Council Response - The draft ELS identifies a hierarchy of centres for the LGA.

Starting with Bankstown as a city centre, it is anticipated to emerge into an employment and economic generator specialising in health and education. The Property Council agrees with the categorisation of Bankstown in the ELS as it plays an important role within the South District, being the district's primary centre along with Hurstville.

Campsie is identified as a town centre that is identified in the district plan as a strategic centre. The ELS proposes the establishment of Campsie as a 'specialised lifestyle precinct'. The Property Council is unclear what is meant by this designation and suggests that Council clarify its intention for future development of Campsie.

The LGA has 9 local centres consisting of the centres established on the East Hills and Bankstown railway lines plus Greenacre and Earlwood. These are serviced by good access and provide a mix of retail, commercial and community spaces.

Other centres within the LGA have been identified as local centres (eg. Belmore and Yagoona), village centres (eg. Punchbowl and Wiley Park) or small village centres (eg. Panania and Hurlstone Park). These classifications are appropriate.

Roselands and Chullora Marketplace have been identified as stand-alone shopping centres that provide for shopping needs of their local communities, serving a broader catchment and a diversity of retail uses. Roselands is zoned B2 – Local Centre under the *Canterbury LEP 2012* and the Chullora Market Place is zoned B2 – Local Centre under the *Bankstown LEP 2015*. The ELS has suggested investigating that give greater flexibility and alignment to the centres hierarchy such as B4 Mixed Use. We would support the investigation of an appropriate zoning for both of these centres.

The ELS has found there are inconsistencies between the two local environmental plans regarding how centres are zoned. It has found the zoning of some centres to be inconsistent with the centres hierarchy proposed above. It is suggested that 7 village centres that are currently zoned B2 Local Centre could be given a more appropriate zoning of B1 Neighbourhood Centre. This includes Sefton, Georges Hall, East Hills, Belfield, Croydon Park, Hurlstone Park and Condell Park. The Property Council would support this with the exception of those centres with a railway station and frequent bus services that would be more appropriate remaining as B2 Local Centre.

A number of changes to the existing development standards for Condell Park, Croydon Park and Hurlstone Park are proposed. These are considered below:

Centre	Current zoning and FSR/Height	Proposed Centre Hierarchy	Draft ELS Recommended
Condell Park	B2 Local Centre 1.5:1 & 2:1 11.0 m	Small Village Centre	It is recommended that the density controls be lowered and the zoning to B1 investigated.
Croydon Park	B2 Local Centre N/A 18.0 m	Small Village Centre	It is recommended that the future zoning of the centre be reviewed to align with the centres hierarchy. Additionally, the height of the centre is set at 18m which given the low level of public transport accessibility of this centre, it is recommended that the maximum height be reduced to 11.0 m.
Hurlstone Park	B2 Local Centre 0.9:1 & 0.75:1 & N/A 11.5 m & 14.0 m	Small Village Centre	To provide consistent messaging about the future direction and role of the centre, it is suggested that the zoning of the centre be reviewed. A B1 zoning with a maximum height of 11.0 m may be more appropriate for this centre with strong architectural character.

These changes to the planning controls and zoning for Condell Park and Croydon Park are supported given they are small centres without regular public transport. Hurlstone Park on the otherhand is located at an existing railway station that will soon be upgraded to Sydney Metro service. It is also located a short distance from the L1 Light Rail service. Given the Council is preparing to undertaking a master plan exercise for the centres located along the route of the Sydney Metro, it would be premature to proceed with any change to the current zoning and planning controls for Hurlstone Park.

Employment - Strategic Centres

Bankstown CBD

The majority of Bankstown CBD is currently zoned B4 Mixed Use under *Bankstown LEP 2015*. At section 9.1.11, the draft ELS has suggested that mechanisms need to be put in place to ensure a long-term supply of employment floor space in the CBD. It found the current planning controls, including the B4 zoning, generally encourage mixed use developments with a requirement for the ground floor and first floor to be commercial premises and other non-residential uses. The ELS argues this arrangement does not support the establishment of Bankstown as a diverse CBD and would not yield an adequate floor space to support up to 25,000 jobs by 2036.

In response it suggests a commercial core zone be applied to a part of the Bankstown CBD to protect an area for employment uses. That would exclude residential apartment development from that area. Council's draft ELS has provided an options analysis to assist in the determination of the extent of the B3 Commercial Core zone. We would support Council considering investigating the use of a B3 Commercial Core zone in order to support the employment targets set out in the South District Plan being achieved.

It has also been suggested that further protection for commercial floor space can be achieved by implementing measures to encourage commercial floor space. Options could involve increasing maximum FSR in the B4 zone to 4.5:1 and a maximum building height to 60 metres, including a new clause in the LEP to prevent new development resulting in a net loss of commercial floor area and continue to allow mixed use development in the B4 zone and set a minimum FSR requirement of 1.4:1 being commercial floorspace.

Population growth around the Bankstown CBD to support local business and contribute to an active and vibrant CBD has also been proposed. Measures such as increasing the development potential of the surrounding R4 High Density Residential Zone is one option that may be considered. We would encourage Council to investigate a range of options that support Bankstown's role as a major centre in the South District and provide more jobs close to housing.

Campsie

The majority of Campsie town centre is zoned B2 Local Centre under *Canterbury LEP 2012*. At section 9.2.11, the draft ELS has found that between 108,000sqm and 127,000sqm of additional commercial floor space will be required to meet the 2036 jobs target. It has indicated that opportunities to expand the centre (including incremental amendments to the planning controls) will need to be investigated to maintain the traditional high street character and accommodate future demand. A number of actions are proposed within the draft ELS to assist achieve this outcome.

Campsie has been identified as a 'lifestyle precinct' and encouragement of entertaining, leisure and retail activities are considered to required to achieve this. A range of measures to achieve this have been proposed including the implementation of built-form controls which protect character, ensure

a transition of building heights, encourage shop top housing and maintain retail and commercial at street level. Medium to longer term need to expansion of Campsie is also suggested. These actions are supported.

Employment – Industrial Precincts

The LGA has almost 970 hectares of land in employment precincts. This includes land zoned B5 Business Development, B7 Business Park, IN1 General Industrial and IN2 Light Industrial.

Chullora Business Park

Chullora Business Park is located on the northern edge of the city and is partially zoned IN1 and partially zoned IN2 under *Bankstown LEP 2015*. The area is an important employment precinct and Council's Local Strategic Planning Statement anticipates it will transition to a higher order centre to attract major corporations and commercial headquarters. Similar to Macquarie Park, Chullora offers large lots and floorplates with good road access.

The draft ELS suggests a review of planning controls is appropriate to allow the development of services and complementary uses, such as conference facilities (hotel), and convenience retail services. Aesthetic improvements such as better open space and transport connections to Bankstown CBD have also been suggested.

We would support these changes to planning controls for Chullora to attract new tenants and business investment to the precinct.

Condell Park

The Condell Park industrial precinct is located in west of the city adjacent to Bankstown Airport and has an area of 325,000sqm. The precinct is zoned IN2 Light Industrial under *Bankstown LEP 2015*. The ELS indicates the strategic direction for Condell Park is to retain and manage the precinct.

The precinct is expected to continue to change as emerging technologies and new industries with different requirements impact on the precinct. Improved connections to the airport and Bankstown CBD could support local businesses and strengthen the role and function of the precinct.

We support the findings in respect of this precinct.

Kingsgrove

The Kingsgrove industrial precinct is located in the south of the city adjacent to the Georges River LGA boundary and has an area of 418,000sqm. The precinct is zoned IN2 Light Industrial under the *Canterbury LEP 2012*.

The ELS indicates the strategic direction for Kingsgrove is that it will form the southern component of the Eastern Lifestyle and Medical Precinct proposed by Council. The immediate future for the precinct is to retain and manage. A future metro service from Southern Sydney to northern Sydney has been discussed and this may require a planning review of the precinct.

We look forward to receiving more detail on these changes and how it will impact the precinct. As with the Clemton Park industrial precinct, the precinct may be suitable to the changes proposed by Council however we suggest Council be as flexible as possible towards the future use of land in this precinct.

Milperra

The Milperra industrial precinct is located in the west of the city adjacent to the Georges River and the M5 Motorway. The precinct contains both IN1 and IN2 zoned land under the *Bankstown LEP 2015*. Milperra provides significant industrial and urban service land for the South District and beyond into south-west Sydney. It is one of the most important centres of economic activity in the South District with up to 15,700 jobs in manufacturing, aviation and electronics.

The precinct will be retained and managed as industrial land and strengthened by continuing to leverage new planning controls to enhance amenity. We support the move towards comprehensive planning for the area due to the identification of the Bankstown CBD and Bankstown Airport Collaboration Area.

Padstow

The Padstow industrial precinct is located in the south west of the city near the M5 Motorway and A6 Fairford Road. It comprises both IN1 General Industrial and IN2 Light Industrial zoned land under *Bankstown LEP 2015*. The precinct has an area of 1,924,000sqm.

The precinct will be retained and managed as industrial land allowing industrial and urban services to safeguard from competing pressures. The objective is to provide a mix of activities that support the city's economy and population. No changes are proposed to the range of permissible uses. This position is appropriate and supported.

Villawood

The Villawood industrial precinct is located in the north western edge of the city near its boundaries with Cumberland and Fairfield council areas. The precinct has a size of 1,787,000sqm and has land zoned IN1 General Industrial and IN2 Light Industrial under *Bankstown LEP 2015*.

The strategic direction for the Villawood industrial precinct is to retain and manage as industrial land. A particular objective is to protect this area for large lot manufacturing as there are few similar locations around Greater Sydney.

No changes are proposed to the range of permissible land uses. This position is appropriate and supported.

Clemton Park

The Clemton Park industrial precinct is located in the eastern part of the city between Campsie and Kingsgrove. It has an area of about 177,000sqm and is dominated by automotive-related activity. The precinct is zoned IN2 Light Industrial under *Canterbury LEP 2012*.

The draft ELS proposes a strategic direction that involves retaining and managing the precinct for industrial and urban services land uses. The precinct is expected to continue to change as emerging technologies and new industries with different requirements impact the precinct.

Council intends to undertake a broader master planning exercise for the Eastern Lifestyle and Medical Precinct -Campsie to Kingsgrove that will guide the role of Clemton Park to support the evolution of the broader area. We look forward to receiving more detail on these changes and how it will impact the precinct. As with the Kingsgrove industrial precinct, the precinct may be suitable to the changes proposed by Council however we suggest Council be as flexible as possible towards the future use of land in this precinct.

Draft Affordable Housing Strategy

We welcome the opportunity to provide comments to Council on the Canterbury Bankstown Draft Affordable Housing Strategy (draft AHS) released for public consultation.

The Property Council supports a strategic approach to affordable housing policy than the current piecemeal action that is underway. In 2018 we called on the State government to develop a “NSW Affordable Housing Policy” that would govern how local councils, such as City of Canterbury Bankstown, apply affordable housing levies and look at potential incentives to stimulate the supply of affordable housing through a range of planning and taxation measures.

During 2018 the NSW Government made a number of amendments to *State Environmental Planning Policy No 70 – Affordable Housing (Revised Schemes)* (SEPP 70) which removed a significant barrier to many local councils developing affordable housing contribution schemes. With this barrier removed, local councils can develop schemes through amendments to their local environmental plans. The Property Council was cautiously prepared to support expansion of SEPP 70 as a means to better regulate the implementation of council-run affordable housing contribution schemes.

The Metropolis of Three Cities and the South District Plan establishes the need for providing affordable rental housing within the South District. Objective 11 of the district plan states that housing is more diverse and affordable. The Greater Sydney Commission has set Affordable Rental Housing Targets as a mechanism to deliver additional supply of affordable housing for very low to low-income households in Greater Sydney. Targets generally in the range of 5 to 10% of new residential floor space (subject to viability) have been established.

In February 2019, the Department of Planning, Industry and Environment issued *Guideline for Developing an Affordable Housing Contribution Scheme* which provides guidance regarding the preparation of a new contribution scheme. The guidelines set out a four (4) step process for preparing a scheme, beginning with establishing the evidence base, identification of areas for rezoning, establish a contribution rate and production of the scheme based on the Department’s template. We note that Council has referred to the guidelines in the development of this draft strategy.

Directions	Actions	Property Council response
Support Council's strategic policy for the delivery of affordable housing	Action 1.1 - In future master planning of growth precincts, ensure that the affordable housing targets established by Council's Community Strategic Plan and Local Strategic Planning Statement are tested and an appropriate levy be applied subject to viability and feasibility testing.	The Property Council generally supports these actions. We encourage Council to proceed with the implementation of the GSC's Affordable Rental Housing Targets (5-10%) within parts of the City of Canterbury Bankstown through the establishment of an Affordable Housing Contribution Scheme within the City's LEP.
	Action 1.2 - Revise Council's planning documents and website to reflect Council's policy position on affordable housing upon finalisation of the Local Strategic Planning Statement, with regular updates upon adoption and implementation of this strategy.	It is important that project viability and feasibility are essential matters considered in the development of Council's scheme. This is an important stage in the process of developing a scheme. It is particularly at this time that the cost of implementing affordable housing schemes do not prevent the supply of housing in Sydney from continuing.
	Action 1.3 - Produce promotional material on affordable housing upon adoption of this strategy.	We reserve our position on the scheme until the details have been finalised and released for comment as part of a separate future planning proposal.
Establish statutory planning mechanisms to facilitate the delivery of affordable housing	Action 2.1 - Include provisions in the LEP via a Planning Proposal to enable Council to (a) reference an Affordable Housing Contribution Scheme in the LEP(s) and (b) require an affordable housing contribution, consistent with an affordable housing contribution scheme.	The Property Council generally support these actions. As indicated above, we support in-principle, the development of an Affordable Housing Contribution Scheme modelled on the GSC's targets and Department of Planning, Industry and Environment guidelines. We would provide further comment on the details when a planning proposal is finalised and released for comment.
	Action 2.2 - Prepare an Affordable Housing Contributions Scheme (ACHS) that identifies sites/precincts where affordable housing contributions are required and the rate of the contribution. The rate is to be based on feasibility testing for each site/precinct. Initially, this would apply in Bankstown and Campsie following the completion of master plans for those centres, however further sites and precincts will be added to the scheme as they are master planned.	

	<p>Following testing, implement a contribution rate for development applications in areas where uplift has recently or is proposed to occur.</p> <p>Dedicated dwellings will need to be a mix of sizes, types and locations within a building or development to ensure an acceptable standard of amenity and a mix of dwelling types to meet the needs of a range of households.</p> <p>In relation to planning proposals, it is proposed to amend the Planning Agreement Policy to confirm with the Ministerial Direction (March 2019) and include a requirement for a 5% affordable housing contribution for planning proposals resulting in uplift or more than 1,000sqm of residential floor space, unless otherwise agreed with Council.</p> <p>Action 2.3 - An alternative rate may be negotiated subject to feasibility and/or where other types of public benefits are warranted. Feasibility testing provided by a proponent is to be the subject of independent verification. Other types of public benefits are to be considered as part of the broader Planning Agreement Policy on a case by case basis, including consideration of prioritisation of other community infrastructure.</p> <p>Dedicated dwellings will need to be a mix of sizes, types and locations within a building or development to ensure an acceptable standard of amenity and a mix of dwelling types to meet the needs of a range of households.</p> <p>Action 2.4 - Add new precincts/sites to the Affordable Housing Contributions Scheme as they are master planned, with affordable housing contributions to be determined for each precinct/site through feasibility testing of built form controls (tipping point analysis). These master plans should test the provision of 15% of</p>	
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	residential floor space as affordable housing, consistent with <i>CBCity 2028</i> and <i>Connective City 2036</i> actions.	
Establish appropriate administrative and fund management procedures	Action 3.1 - Establish an Affordable Housing Fund for mandatory and voluntary affordable housing contributions.	<p>Actions 3.1 to 3.4 are noted.</p> <p>The Property Council supports a regional or district approach to the management and dispersal of contributions collected for affordable housing. Pooling levies collected by councils across Greater Sydney or within a district would allow for affordable housing to be developed sooner than otherwise would occur. Councils would draw upon funds for affordable housing as sites within their LGA become available.</p>
	Action 3.2 - Develop appropriate administrative provisions to provide more detailed information about the application of an affordable housing contribution scheme. It is envisaged this will include such matters (but not limited to) (a) the statutory framework for the program, Affordable Housing provisions, including the calculation of the contributions, indexation and excluded development and (c) how to make Affordable Housing – dedication and monetary.	
	Action 3.3 - Establish appropriate conditions of development consent to ensure the transfer of funds and affordable dwellings.	
	Action 3.4 - Establish a strong working relationship with community housing providers.	
Enhance Council's knowledge of affordable housing practices	Action 4.1 - Facilitate regular training sessions for staff on affordable housing practices which may involve Community Housing Providers, fund managers and the like.	These actions are noted.
	Action 4.2 - Allocate affordable housing responsibilities to a dedicated team member(s) to ensure ongoing allocation of resources to affordable housing.	
Undertake an asset strategy	Action 5.1 - Council to undertake an asset strategy to identify suitable surplus sites for potential development of affordable rental housing projects.	This action is noted and supported.

Review and monitoring	Action - 6.1 Council to regularly review this strategy and report on the delivery of affordable housing under this strategy and the <i>State Environmental Planning Policy No. 70 – Affordable Housing (Revised Schemes)</i> .	This action is noted.
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Draft Amendment to Planning Agreements Policy

We welcome the opportunity to provide comments to Council on the proposed amendment to the Planning Agreements Policy that has been released for public consultation.

The amendment will insert a new section into the policy (section 2.6) dealing with the provision of affordable housing where a planning proposal seeks uplift of residential floor space exceeding 1,000 sqm.

The amended policy will require the equivalent of at least 5% of the increased residential floor space to be dedicated to Council (either as 'in kind' or monetary contribution).

The Property Council generally supports this amendment as proposed. However, we would ask Council to update the policy to reflect the Greater Sydney Commission's target range of between 5 and 10%. There should be acknowledgement of the upper threshold and that any contribution is subject to economic viability/feasibility testing prior to any contribution being levied on a development consent.