



Property Council of Australia
ABN 13 00847 4422

Level 1, 11 Barrack Street
Sydney NSW 2000

T. +61 2 9033 1900
E. nsw@propertycouncil.com.au

propertycouncil.com.au
 [@propertycouncil](https://twitter.com/propertycouncil)

Australia's property industry

Creating for Generations

25 August 2020

Mr Alan Young PSM
City Manager
Fairfield City Council
PO Box 21
FAIRFIELD NSW 1860

Email – mail@fairfieldcity.nsw.gov.au

Dear Mr Young

Planning Proposal to amend Fairfield LEP 2013 to increase housing supply (Council Ref: 15/13681 – Submission 2020 – Rezoning)

The Property Council of Australia welcomes the opportunity to provide comments to Council on the above planning proposal.

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. We are pleased to provide the following comments for your consideration.

Background

It is understood these changes arise from a Residential Development Strategy prepared and adopted by Council in 2009. The initial Planning Proposal was adopted by Council in July 2015 and subsequently forwarded to the then Department of Planning and Environment seeking a Gateway determination. A Gateway determination was issued for this proposal in February 2016.

Exhibition of the Planning Proposal commenced in early 2016 which led to the identification of further opportunity to refine certain zone boundaries between precincts. A need for additional infrastructure (stormwater detention basins and open space) in the renewal precincts was also raised during the consultation process.

The current proposal has been amended to reflect the significant issues identified during the 2016 exhibition process.

Intent of the Revised Planning Proposal

The revised Planning Proposal aims to increase housing supply, choice and affordability around the precincts of Fairfield, Fairfield Heights and Villawood by providing for higher densities in established areas closer to public transport and areas ready for urban renewal opportunities.

We support the revised Planning Proposal as it gives effect to the requirements of the Western City District Plan and Council's Local Strategic Planning Statement.

Zone Changes

In order to achieve the outcome described above, the proposal will make the following seven changes to **Fairfield Local Environmental Plan 2013**:

- a) Rezone R3 Medium Density Residential zone land in Fairfield, Fairfield East and Villawood to R4 High Density Residential zone;
- b) Rezone R2 Low Density Residential zone land in Fairfield East and Fairfield Heights to R3 Medium Density Residential zone;
- c) Rezone certain land at Fairfield East from R2 Low Density Residential zone to RE1 Public Recreation zone;
- d) Rezone certain R2 Low Density Residential zone land in Fairfield and Fairfield Heights to RE1 Public Recreation zone;
- e) Rezone certain R3 Medium Density Residential zone land in Fairfield, Fairfield Heights and Villawood to RE1 Public Recreation zone;
- f) Rezone certain R4 High Density Residential zone land in Villawood to RE1 Public Recreation zone; and
- g) Amend associated Floor Space Ratio, Height of Buildings and Lot Size maps as required.

It is unclear from the Planning Proposal how many additional dwellings are expected to result from the proposed zoning changes. Despite this, the changes will enable the potential for a significant increase in housing across the Fairfield City LGA. It will also contribute towards meeting Council's 6-10 year housing target of between 3,000 and 3,800 additional dwellings set by the Greater Sydney Commission. Accordingly, these zoning changes are supported.

Development Standards

The maps contained within Appendix A.2 illustrate the extent of the zone changes and the amendments to the applicable Floor Space Ratio (FSR) and Height of Building planning controls.

The proposed density and heights for each of the residential zones are as follows:

<p>R3 Medium Density Residential zone FSR – 0.45:1 Height of Buildings – 9 metres</p>	<p>R4 High Density Residential zone FSR – 2:1 Height of Buildings – 20 metres</p>
--	--

These new development standards proposed to be applied to the land affected by the Planning Proposal appear to be consistent with existing R3 and R4 zones on adjacent land.

However, it is important that Council ensure that development of the rezoned land will be feasible, otherwise the rezoning, of itself, will not deliver the new housing required in the area. It is imperative that Council review the proposed densities and heights to confirm that sites are capable of being redeveloped from their current purpose to higher density housing. Council should carry out testing of these development standards to ensure that they will actually be feasible based on actual land values and development costs. If feasibility testing of development sites determines that medium and high-density residential development is not feasible at this time, Council should look at developing planning controls that give an incentive for redevelopment, including height and density bonuses or other means of encouraging appropriate redevelopment.

Contributions Plans

It is not clear how Council proposes to fund the additional local infrastructure (stormwater detention and open space) required to support the new housing developments. It is also unclear whether there will be unexpected additional infrastructure funding costs associated with the acquisition of land to be zoned for RE1 Public Recreation under this Planning Proposal, or indeed whether there is a budget allocation to undertake and fund these works.

It is essential that if there will be additional funding costs for Council, that it is made clear how those costs will be recovered (eg, through increases to contribution rates or absorbed within the current rates). This will impact feasibility of any potential developments and could adversely impact the stated intent of the Revised Planning Proposal. We would seek your clarification on this point.

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

Yours sincerely



Belinda Ngo
Acting NSW Executive Director
Property Council of Australia