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5 June 2020

Ms Gail Connolly  
The General Manager  
Georges River Council  
PO Box 205  
HURSTVILLE BC NSW 1481

Email [mail@georgesriver.nsw.gov.au](mailto:mail@georgesriver.nsw.gov.au)

Dear Ms Connolly

**Georges River Draft LEP 2020 (Council Ref: SF20/881), Draft Local Housing Strategy & Draft Inclusive Housing Strategy**

The Property Council welcomes the opportunity to provide comments Georges River 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. We are pleased to provide the following comments to Council on each of the draft documents identified above for your consideration.

Given the unusual circumstances faced by the economy due to COVID19, it is critical that support be provided to the construction and housing industry. We would encourage Council to give careful consideration to accelerating the next stage of its planning review, being Stage 2 – Housing Choice. It is vital that this work be brought forward to encourage new development projects to commence and support jobs in our economy.

Should you have any questions in respect of the matters raised in this submission, do not hesitate to contact Troy Loveday, Senior Policy Advisor, on 0414 265 152 or [tloveday@propertycouncil.com.au](mailto: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**

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## Planning Proposal for Consolidated Georges River Local Environmental Plan

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. Georges River Council'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\_2020\_GRIVE\_001) 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 9 of the Planning Proposal states "the first stage of the Georges River LEP is to harmonise the existing LEPs as currently three LEPs apply to the LGA. This stage being the principal LEP, is required to ensure a consistent approach to planning and development is applied across the LGA, and new controls are introduced to give effect to the Planning Priorities and Actions of the South District Plan and the LSPS".

The staged approach being taken by Council is appropriate given Council has commenced implementation of much of its strategic planning work and intends to begin the process of updating its planning controls.

### Housing Targets

The Greater Sydney Commission (GSC) issued Council with a letter of support on 4 March 2020 which included a 6-10 year housing target between 3,450 and 4,250 additional dwellings. This involves the production of more than 690 additional dwellings annually.

The South District Plan imposed a 0-5 year housing target upon Council of 4,800 additional dwellings from 2016/17 to 2020/21 (being production of about 960 new dwellings each year). In the first three years of this period (2016/17 to 2018/19 there has been 2,062 dwellings completed in the Georges River LGA). Council must take necessary action to ensure that its policy settings are appropriate for the continuation of new housing supply above the current 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, but an important step.

### General Comments on Planning Proposal

The intent of the current Planning Proposal is to:

- Give effect to the South District Plan by addressing its Planning Priorities and Actions;
- Implement the LSPS 2040 vision for the LGA addressing its Planning Priorities and Actions;
- Meet the South District housing targets;
- Identify additional housing opportunities through the harmonisation of existing LEPs;
- Retain and manage industrial and urban services land;
- Provide a regulatory environment that enables economic opportunities;
- Protect future transport and infrastructure corridors;
- Facilitate opportunities for creative and artistic industries; and
- Identify, conserve and enhance environmental heritage.

These actions are generally considered to be appropriate, and in most cases, supported. We provide specific comment in relation to a number of other areas below.

### Housing Investigation Areas

The package of documents released for exhibition includes Council's draft Local Housing Strategy and Housing Investigation Areas Paper. Together these address the need for additional housing to be supplied in the Georges River LGA and consider actions required to encourage the supply of new dwellings within the city.

Council's LSPS identified several areas to be investigated for new housing through upzoning as part of the current planning proposal. These being the following five (5) precincts:

<b>Location</b>	<b>Size &amp; Existing Dwellings</b>	<b>Potential Yield</b>
Hillcrest Avenue, Hurstville	3,490 sqm 5 existing dwellings	14 dwellings (including 9 additional dwellings)
North and West of Peakhurst Park, Peakhurst	111,950 sqm 179 existing dwellings	335 dwellings (including 155 additional dwellings)
Apsley Estate, Penshurst	41,850 sqm 78 existing dwellings	183 dwellings (including 105 additional dwellings)
Culwulla Street, South Hurstville	17,125 sqm 27 existing dwellings	57 dwellings (including 30 additional dwellings)
Rowe Street, South Hurstville	9,160 sqm 14 existing dwellings	48 dwellings (including 34 additional dwellings)

The rezoning of these five precincts from the R2 Low Density Residential zone to the R3 Medium Density Residential zone will provide a boost to the city's housing supply for the short to medium term.

The Housing Investigation Areas Paper provides detailed justification for those areas that will deliver an additional 650 dwellings as medium and high-density housing in accessible locations. We support the approach that Council regarding forward planning areas for new housing that will contribute to it meeting its housing targets.

The selection of the five precincts for growth has been based on an appropriate set of criteria developed in Council's LSPS and includes access to transport, existing infrastructure and social services. The LSPS Criteria to Guide Growth have been adapted to this process and developed into a set of seven (7) guiding principles to inform the selection of areas suitable for renewal. Each of the precincts appears to do well in terms of achieving the Council's guiding principles.

### Residential Zone Changes R3 and R4

The Planning Proposal intends to achieve a hierarchy of residential density through the translation of all existing R3 Medium Density Residential Zoned land with a height of 12m or greater in both the Hurstville LEP 2012 and Kogarah LEP 2012 to the R4 High Density Residential zone where residential flat buildings are currently permitted as the prevailing typology. This is a sensible approach and is

supported. Existing R3 zones with building height limit of 9 metres will remain zoned R3 Medium Density Residential.

#### Special Use Zone

The planning proposal will alter the zoning of any land identified as SP2 "Church", SP2 "Aged Care" and SP2 "Community Purposes" under the Hurstville LEP 2012 to the adjoining zone to ensure a consistent approach across the whole city. This approach is appropriate and supported. The changes proposed for schools that are not zoned SP2 "Education Establishments" is also supported.

#### Deferred Areas

There are three sites within the city where the provisions of *Hurstville Local Environmental Plan 1994* apply. The site in Treacy Street, Hurstville is included within the current planning proposal and will be assigned a B4 Mixed Use zone. The current planning proposal does not apply to the Civic Centre site nor the Westfield Shopping Centre site. These sites will remain deferred lands.

#### Design Excellence Clause

It is proposed to include a new design excellence clause in the planning proposal. The clause will be applied to new developments and substantial redevelopments of 12 metres or taller within the business, industrial and high density residential zones as well as developments within the Foreshore Scenic Protection Area (FSPA). The clause does not require a design competition for any proposal, however proposals will need to be peer reviewed by an urban designer or registered architect selected from Council's panel of design experts. The clause will provide a list of criteria that will be applied to all proposals to which the clause applies.

The introduction of a design excellence clause into Council's LEP is supported.

#### Dual Key Dwellings

The planning proposal intends to allow the development of an "internal secondary dwelling" up to a maximum of 75 sqm Gross Floor Area that is wholly contained within the building envelope of an existing principal dwelling. This measure is a worthwhile measure aimed at providing more affordable housing within the city. We support this clause being included within the planning proposal.

#### Creative Industries in Light Industrial Zone (IN2)

The planning proposal seeks to allow for a range of industries (including creative and innovative industries) that do not compete with commercial centres and do not compromise industrial and urban services within the Light Industrial Zone. Council has identified two precincts where this clause shall apply, being Penshurst Ln, Penshurst and Halstead St, South Hurstville. This measure is supported as it will provide encouragement for the location of appropriate development within these small industrial precincts.

## Draft Local Housing Strategy

Council has prepared a draft Local Housing Strategy (DLHS) in response to the requirements contained within the *Greater Sydney Regional Plan* and *South District Plan*.

It is noted that the population of the Georges River LGA is expected to grow by around 18% in the next 20 years (0.9% annually on average) to reach 185,000 by 2036. The draft Strategy has appropriately recognised the need for housing to be delivered to meet the increased population.

### Section 3 – Demographic Overview

The DLHS states Georges River LGA had a population of 156,293 in 2017 and in the ten preceding years had a 1.6% annual rate of population growth. In 2036 the population of Georges River LGA is expected to reach 185,000.

Council would be aware that in 2019 the Department of Planning, Industry and Environment released updated population projections for NSW. These projections show continued population growth in Georges River LGA to reach 190,200 in 2041. The demand for housing will continue to increase and Council should continue to plan for an increased supply of new housing.

Section 3.2 of the DLHS identifies that the population of Georges River LGA is ageing. For example, by 2036 the proportion of the LGA's population aged over 65 years will be 18%. This will be up from 14.9% in 2016. It is important that Council plan for the ageing population and encourage an increase in the supply of appropriate housing for this population group. This may be providing for more villas and townhouses that require less maintenance and close to services such as shops and medical services which are better suited to persons with mobility issues. Council should also consider increasing the supply of purpose-built retirement communities and other forms of seniors accommodation, including residential aged care facilities.

### Section 5 - Housing Supply & Demand

Future housing demand for Georges River LGA until 2036 has been estimated to be 14,000, which represents the South District Plan's 0-5 year housing target of 4,800 plus Council's 6-10 year housing target of 3,450 additional dwelling and 10-20 year target of 5,750 additional dwellings.

We note that Council has estimated that an additional 14,000 dwellings will be required to meet the population growth expected over the next 16 years (until 2036).

Section 5.2 of the DLHS estimates that there is capacity for approximately 6,600 additional dwellings under existing planning controls. The Property Council understands that significant amendments have been made to the planning controls within Georges River Council LGA in recent years. Amendments were made to Kogarah LEP 2012 in 2017 (*Kogarah LEP 2012 (Amendment No 2)*) and to Hurstville LEP 2012 in 2015 (*Hurstville LEP 2012 (Amendment No 3)*). These provided significant uplift and capacity to both Kogarah and Hurstville town centres.

At section 5.3, Council has also identified a further 5,500 additional dwellings are likely to be developed over the short, medium and long term through major development opportunities (development applications and planning proposals). Together these represent the potential for 12,000 additional dwellings within the Georges River LGA.

As part of preparing its Local Strategic Planning Statement in 2019 Council reviewed locations for new housing supply. The areas identified contributed to Council's 6-10 year housing target. It found a number of areas where existing housing opportunities exist under current planning controls, including Hurstville City Centre and Kogarah Town Centre as well as other locations under the Kogarah LEP 2012.

We note that Council has committed to investigating additional capacity through the next stage of its *Commercial Centres Strategy* to meet its 20-year housing target. If there is scope for additional dwellings to be delivered within mixed-use developments and shop top housing, this should be considered. Council's timing for this work to be completed is approximately in 2025. The timing of this project should be brought forward if insufficient supply is being delivered from existing zoned land.

The DLHS does not indicate the likelihood of this potential for new housing being realised into the future. Council should include in the DLHS a section that considers any risks to future housing supply such as constrained sites, development feasibility and other factors that may influence the development of R4 high density residential land in Hurstville and Kogarah town centres.

### Section 7 – Gaps and Issues

Section 7.5 of the DLHS considers the hierarchy of residential zones found in the Hurstville LEP 2012 and Kogarah LEP 2012. It claims a clear hierarchy of residential zones is absent from both existing planning frameworks. It refers to the types of residential development permissible in the existing R3 Medium Density Residential zone does not reflect the objectives of this zone due to the permissibility of low and high density typologies by both local environmental plans.

Clearly since the introduction of the Standard Instrument LEP in 2006 there have been some inconsistencies created regarding an appropriate land use zone for medium density development. As both the Hurstville and Kogarah standard instrument local environmental plans allow residential flat buildings in their respective R3 zones has seen that form of housing dominate at the expense of other types of medium density housing, such as dual occupancy, villas and townhouses.

We support Council's attempts to rationalise its residential zones in such a way that would provide a 'true' medium density residential zone.

### Section 8 – Policy Response: Housing Objectives

This section of the DLHS provides seven (7) objectives and forty-one (41) actions to give effect to the housing strategy. Comments on most of the proposed actions are provided in the table on the following pages.

Draft Local Housing Strategy Objectives & Actions	Property Council Response
<p><u>Objective 1: Accommodate additional housing growth</u></p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- Create additional capacity to meet 6-10 year housing targets through LEP 2020 by rezoning the five Housing Investigation Areas (1. North and west of Peakhurst Park, 2. Culwulla Street, South Hurstville, 3. Hillcrest Ave, Hurstville, 4. Apsley Estate, Penshurst and 5. Connells Pt Rd, South Hurstville).</li> <li>- Investigate opportunities to create additional capacity through a comprehensive review of existing LEPs,</li> <li>- Investigate the role of commercial centres in providing additional housing in LEP 2022 and beyond,</li> <li>- Investigate the potential housing growth areas identified by the <i>LSPS 2040</i> to inform LEP 2025 and beyond.</li> </ul>	<p>The Property Council generally supports these 4 actions as they are considered to be appropriate to deliver against Objective 1.</p>
<p><u>Objective 2: Coordinate growth with infrastructure</u></p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- Ensure rezonings are consistent with the criteria to guide growth in <i>LSPS 2040</i>,</li> <li>- Investigate areas along existing and planned transport links, centres and services that can accommodate additional housing,</li> <li>- Provide additional open space in residential growth areas,</li> <li>- Advocate to the NSW Government to provide expanded and new public transport and education facilities to meet current and future demand, particularly in new housing investigation areas,</li> <li>- Investigate appropriate infrastructure funding options where there is an uplift in density,</li> <li>- Collaborate with the NSW Government and State-owned corporations to deliver adaptive and flexible enabling infrastructure (energy, gas and water), especially in areas of housing and employment growth.</li> <li>- Investigate inclusionary zoning provisions in the LEP to deliver inclusive housing.</li> </ul>	<p>The Property Council generally supports these 7 actions.</p> <p>We support Council planning for and investigating potential funding mechanisms for enabling infrastructure to support new growth.</p> <p>In regards to the final action to investigate inclusionary zoning we provide in-principle support for the introduction of an Affordable Housing Contribution Scheme that is consistent with the Greater Sydney Commission targets and implemented in accordance with Department of Planning guidelines published in 2019.</p>

<p><u>Objective 3: Provide affordable and inclusive housing.</u></p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- Prepare an Inclusive Housing Strategy,</li> <li>- include provisions in the LEP for affordable housing and inclusive housing,</li> <li>- Amend Council's Planning Agreement Policy in line with the Ministerial Direction for VPAs and affordable housing to permit affordable housing contributions on sites with a planning proposal resulting in an uplift,</li> <li>- Prepare an Affordable Housing Contributions Scheme and identify areas where this can apply,</li> <li>- Preparation of a policy and procedures via collaborating with community housing providers to support the ongoing delivery and management of affordable housing,</li> <li>- Investigate the adaptive re-use of large houses in LEP 2021.</li> <li>- Investigate build to rent schemes, including incentives in the LEP and DCP.</li> </ul>	<p>The Property Council notes this objective and associated 7 actions and we provide the following comments.</p> <p>Council's policy in respect to planning agreements should be consistent with the Department of Planning, Industry and Environment's draft Practice Note (dated April 2020) which is intended to replace earlier versions of the practice note.</p> <p>Should Council decide to proceed with the establishment of an Affordable Housing Contributions Scheme under SEPP No 70, it should be designed to align to the Department of Planning, Industry and Environment guidelines issued in February 2019.</p> <p>Council's proposal to investigate 'build to rent' schemes is welcome and fully supported. We would welcome the opportunity for a further briefing and engagement on the build to rent model and the experiences of our members in delivering this asset class.</p>
<p><u>Objective 4: Provide greater housing choice and diversity</u></p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- Facilitate a broader range of housing types across the LGA through rezoning land, including controls for medium density development in the LEP and DCP,</li> <li>- Rezone land from R2 to R3 to deliver medium density housing in the housing investigation areas,</li> <li>- Provide controls to deliver universal design as part of new residential developments through DCP 2020,</li> <li>- Amend the DCP to require a suitable mix of apartment sizes,</li> <li>- Investigate the provision of housing for seniors through the LEP,</li> <li>- Investigate 'build to rent' provisions.</li> </ul>	<p>The Property Council generally supports these 6 actions.</p> <p>In particular, we endorse efforts to encourage greater housing diversity and choice within the Georges River LGA, including medium density housing.</p> <p>We welcome the inclusion of better access requirements into Council's DCP and suggest that these should be aligned to the National Construction Code standards. Requirements above the NCC standards should be voluntary and encouraged through the use of an incentive-based approach.</p> <p>Council's proposal to investigate 'build to rent' as an alternative to traditional housing is welcome and fully supported.</p>



<p><u>Objective 5: Have consistent LEP zoning and controls across the LGA</u></p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- Establish a hierarchy of residential zones that restricts low, medium and high density development to their respective zones in LEP 2020,</li> <li>- Harmonise the minimum subdivision lot size requirements for R2 Low Density Residential zones in LEP 2020.</li> <li>- Review the extent of the Foreshore Scenic Protection Area (FSPA) in LEP 2020 in accordance with the LSPS 2040 key action with a specific focus on creating an equitable and consistent application across the LGA,</li> <li>- Implement prescriptive building envelope and interface controls in DCP 2020 to address and regulate transitions between different residential zones.</li> <li>- Prepare for the commencement of the Low Rise Medium Density Housing Code by introducing development controls for manor houses and multi dwelling housing (terraces) in the R3 Medium Density Residential zone in LEP 2020.</li> <li>- Investigate opportunities to utilise the medium density zone as a transition between low and high density zones in LEP 2025 and beyond.</li> </ul>	<p>The Property Council generally supports these 6 actions.</p> <p>The proposal to harmonise the planning controls of the former Hurstville City Council and Kogarah City Council through a new environmental planning instrument are supported.</p> <p>We support Council investigating the opportunity to use the R3 Medium Density Residential zone as a transition between low and medium density zones.</p>
<p><u>Objective 6: Enhance and protect the local character</u></p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- Identify the key characteristics of each suburb to be protected and retained and incorporate into DCP 2020,</li> <li>- Advocate to the NSW Government for improvements to the <i>Low Rise Medium Density Housing Code</i> to ensure medium density developments respect the established local character,</li> <li>- Continue to protect and promote the character of heritage items and conservation areas through LEP and DCP.</li> <li>- Introduce landscaping provisions in LEP 2020 for the development of sites,</li> <li>- Introduce design excellence provisions in the LEP 2020.</li> </ul>	<p>The Property Council generally supports these 5 actions.</p> <p>We would welcome a review of the operation of the <i>Low Rise Medium Density Housing Code</i> after a reasonable period following its commencement across Sydney.</p> <p>The protection of heritage items and representative conservation areas through Council's LEP and DCP is supported. Any requirements applying to items or conservation areas should be clear and easily understood.</p> <p>The introduction of design excellence provisions to Council's LEP should involve extensive consultation with stakeholders. Any process to require design excellence for apartment buildings above that required by SEPP 65 &amp; the ADG should involve appropriate height and or density bonus.</p>

<p><u>Objective 7: Facilitate good design and sustainable development practices</u></p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- Incorporate design excellence provisions in LEP 2020,</li> <li>- Provide provisions in LEP 2020 to ensure development in high density residential zones is consistent with principles of sustainable practice and environmentally sensitive design,</li> <li>- Include controls in DCP 2020 to ensure accessible green spaces and gradual and appropriate height transitions, landscaping, vista protection and the integration of Crime Prevention through Environmental Design (CPTED) principles,</li> <li>- Include waste and sustainability controls in Council's DCP 2020,</li> <li>- Provide controls for the provision of facilities to support the operation of car and ride sharing in high density residential developments in DCP 2020,</li> <li>- Promote the use of renewable energy storage through Council's DCP 2020.</li> </ul>	<p>The Property Council generally supports these 6 actions.</p> <p>As indicated above, we would cautiously welcome Council introducing design excellence provisions into its LEP.</p> <p>The introduction of design-based planning controls into Council's DCP are supported and further comments will be provided once the details are finalised and placed on public exhibition.</p> <p>The other sustainability measures into Council's DCP are generally supported and further comments will be provided once the details are finalised and placed on public exhibition.</p>
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## Draft Inclusive Housing Strategy

The Property Council welcomes the opportunity to provide comments to Council on its draft Inclusive Housing Strategy.

### Options to encourage housing diversity

The draft strategy proposes several options to promote housing diversity. These include:–

- Influencing dwelling size;
- Centres based housing strategies;
- Inclusive housing types; and
- Mixed tenure.

### Influencing dwelling sizes

The draft strategy acknowledges that Council's planning controls do not currently encourage a mix of bedroom numbers for residential dwellings. Due to local issues of overcrowding and homogenous apartment mix within the city, Council is proposing that the current SEPP 65 requirement regarding apartment mix be strengthened.

Council has analysed the projected need for dwelling sizes to 3036 and found that there will be a significant shortage of studio and 1-bedroom dwellings within the Georges River LGA to meet the expected number of lone person and couple households.

It is noted that the draft strategy is proposing a DCP requirement to encourage the development of a mix of housing sizes to meet future needs of the community. The following dwelling mix requirement is proposed for developments proposed 10 or more dwellings:

Apartment Type	Recommended Mix
Studio/1 bedroom	Minimum 20%
2 bedroom	Maximum 30%
3 bedroom and more	Minimum 15%

Alternatively, the applicant may provide justification for the proposed dwelling mix based on relevant demographic data for the locality. Variations from the above mix would be at the discretion of the consent authority.

We note the motivation behind this proposed requirement and provide in-principle support. In our view, the use of this type of approach is best implemented by the use of incentives rather than restrictions. We would suggest Council consider incentives for developers to provide greater balance in their apartment mix. This could include variations in other areas of the development or reduced car parking rates in areas close to frequent public transport services. Nevertheless, we would suggest Council consider undertaking more targeted consultation with the development industry before proceeding to implement this requirement in the DCP.

### Inclusive housing types

The draft Strategy suggests that Council consider encouraging several emerging housing types through openness to innovation in housing delivery. This group includes co-living, live-work housing models, accessible and adaptable housing, housing for Aboriginal and Torres Strait Islanders, Build to Rent Schemes, housing targeted to first home buyers and reduced parking requirements.

We generally endorse this recommendation and we support initiatives aimed at encouraging the development of innovating housing types.

### Options to encourage affordable housing

The draft strategy proposes several options to promote affordable housing. These include:-

- Planning agreements on large redevelopment sites;
- Affordable rental housing projects with a community housing provider, on land dedicated by Council;
- Government agency partnership;
- Affordable rental housing targets/contributions;
- Infill housing; and
- Next generation boarding houses.

### Planning Agreements

The draft Strategy recognises that planning agreements can authorise development contributions for a variety of public purposes, including affordable housing. The relevant Ministerial Direction requires any Council seeking an affordable housing contribution must prepare and publish a policy that sets out the circumstances in which it may seek out a planning agreement.

The Department of Planning, Industry and Environment is currently seeking comment on an updated Planning Agreement Practice Note (dated April 2020) and we would encourage Council to consider the content of the draft practice note as part of its review of the draft Strategy.

### Affordable Rental Housing Projects with a CHP on land dedicated by Council

This aspect of the draft Strategy is noted and supported.

### Government agency partnership

This aspect of the draft Strategy is noted and we would encourage Council to work collaboratively with Land and Housing Corporation (LAHC) in respect of potential opportunities to redevelop social housing within the city.

### Affordable Rental Housing Targets & Contributions

The Property Council generally supports the affordable housing targets set by the Greater Sydney Commission and embedded into the South District Plan. Following the amendment to State Environmental Planning Policy No 70 – Affordable Housing (Revised Schemes) in 2019, local councils are now permitted to establish Affordable Housing Contribution Schemes through their local environmental plans.

We note Council's intention to develop a contribution scheme in fully in accordance with the guidelines issued by the Department of Planning, Industry and Environment in February 2019 (*Guidelines for developing an affordable housing contribution scheme*). We will provide further comments to Council on this when it has more detail available and is ready to exhibit a planning proposal to establish the scheme within its local environmental plan.

#### Infill Housing

The draft Strategy acknowledges that the private market can deliver affordable housing under the Affordable Rental Housing SEPP 2009. It indicates that this type of housing is typically aimed at households on moderate incomes. It is suggested that consideration could be given to rezoning some areas currently zoned R2 Low Density Residential to R3 Medium Density Residential to increase opportunities for infill affordable rental housing.

We would support Council adopting this proposal as it would provide another mechanism for increasing the supply of diverse and affordable housing within the city.

#### Next generation boarding houses

The draft Strategy suggests that Council could consider encouraging boarding houses close to the hospital precinct in Kogarah as a way of providing medium term affordable housing to people seeking access to appropriate accommodation to meet their needs. This could be achieved using the Affordable Rental Housing SEPP 2009, Council's DCP and development advice to clients.

We would support Council adopting this proposal as it would provide another mechanism for increasing the supply of diverse and affordable housing within the city.