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26 November 2020

Mr Ron Moore
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Camden Council
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Dear Mr Moore

Draft Camden Local Housing Strategy

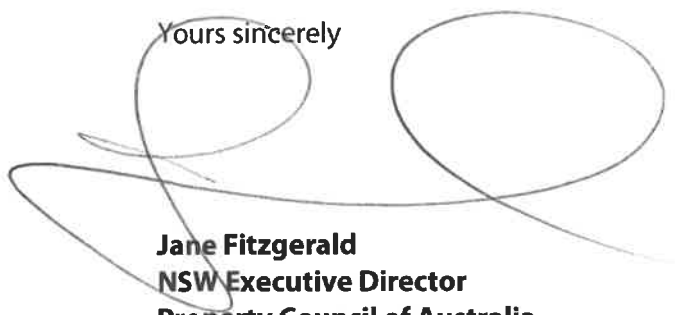
The Property Council welcomes the opportunity to provide comments to Camden Council on the draft Local Housing Strategy (the Strategy).

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 attached comments on the Strategy for your consideration.

Should you have any questions regarding the content of this submission, please contact Troy Loveday, NSW Policy Manager, on 0414 265 152 or tloveday@propertycouncil.com.au

Yours sincerely



Jane Fitzgerald
NSW Executive Director
Property Council of Australia

Submission to Camden Council

Draft Local Housing Strategy

26 November 2020

1.0 General Comments

Council has prepared a draft Local Housing Strategy (the Strategy) as a requirement of the Greater Sydney Regional Plan (Action 3), the Western City District Plan (Action 17) and Camden Local Strategic Planning Statement (Action 33).

In 2018, the Department of Planning, Industry and Environment (DPIE) issued “Local Housing Strategy Guidelines” to local councils that provides a step by step process for councils developing local housing strategies. We note that Council has prepared the Strategy to be consistent with the Department’s guidelines.

We support Camden Council participating in the NSW Government’s Accelerated LEP Review Program which has allowed for this important piece of strategic planning work to be completed earlier than would have otherwise been possible.

It is crucial that the Strategy sets out actions to provide for a greater diversity of housing types needed by the community. This includes housing appropriate for seniors, single member households and larger families. Actions that will specifically encourage greater supply of these housing types should be included in the final strategy.

2.0 Housing Targets

The Property Council and our members have taken the opportunity to review many draft local housing strategies that have been released for consultation. We applaud Council’s acknowledgement there is more strategic planning work required to provide for greater diversity of housing, especially for seniors and smaller households, and propose strategies to improve housing affordability.

Together the draft Local Housing Strategy and Council’s Local Strategic Planning Statement (LSPS) should identify how medium and long-term housing targets will be achieved. It is understood the Greater Sydney Commission identified a 6 to 10-year housing target for the period 2021/22 to 2025/26 of between 10,000 and 12,500 additional dwellings during the LSPS assurance process.

We believe that Council, as part of its process of setting housing targets, should provide extra capacity that will account for unrealised development potential. Historical evidence will point to the fact that planning for housing supply does not necessitate housing delivery will occur in a simple linear process. Council should consider referring to past trends where housing delivery has not matched identified targets or supply predictions.

3.0 Local Housing Strategy

Council's draft Local Housing Strategy indicates:

- The current population of Camden is 78,220 (2016) and will increase to 233,950 by 2036 (*Note: Council's population data is fairly consistent the DPIE 2016 projections. However, in 2019 DPIE released updated population projections that indicate a 2016 population of 80,250 and a 2041 population of 307,750*).
- For the past decade the population has been growing at about 6% per annum and will increase further to more than 9% each year.
- Demographic changes within the LGA will involve more couples with children, couples without children and seniors.
- Between 2016 and 2036, the number of households will increase by approximately 50,000.
- At the 2016 census, the average household size in Camden LGA was 2.61 persons.
- 21% of the households in Camden LGA are in mortgage stress while 35% of renters are in rental stress.
- Approximately 49,625 additional dwellings will be needed between 2016 and 2035/36.
- Approximately 25,443 additional dwellings are theoretically capable of being supplied under existing planning controls (including 11,000 detached dwellings in land release areas, 9,000 medium to high-density dwellings in release areas and approximately 5,000 dwellings in established areas as infill redevelopment).

We support Council undertaking further work to implement this Strategy once it has been endorsed by DPIE. In particular, Council should give careful consideration to providing a supply of suitable dwellings that meet the needs of seniors, singles, couples and for other demographic groups identified in the Strategy with unmet housing needs.

4.0 Priorities and Actions

Section 3 of the Strategy identifies actions recommended to deliver its outcomes. The following table responds to these actions.

Priorities and Actions	Property Council Response
Priority 1 – Providing housing capacity and coordinating growth with infrastructure Actions: 1. Plan for the GSC 6 to 10-year (2021/22 to 2025/26) housing target of 10,000 to 12,500 dwellings and ensure sufficient planning capacity through the rezoning and review of land within the SWGA subject to the delivery of supporting infrastructure, 2. Develop a Camden LGA SWGA Infrastructure Study to inform infrastructure requirements and a land sequence schedule to facilitate the orderly supply of housing, 3. Develop a community information program for landowners and stakeholders within the SWGA Camden Precincts, 4. Ensure internal assessment processes for development assessments and planning proposals support the efficient delivery of housing in the Camden LGA, 5. Review how development approval and completion data is captured to assist in monitoring housing diversity and capacity in the Camden LGA, 6. Advocate for a Project Working Group between Council officers and essential service providers to deliver adaptive and flexible infrastructure, 7. Finalise the Camden Green and Blue Grid Analysis, 8. Explore the development of a fragmented land policy for the SWGA Precincts.	The Property Council supports Council implementing Priority 1 and the eight (8) associated actions. In particular, Council's intention to plan for Council's 6 to 10-year housing target and delivery of supporting infrastructure. We welcome Council's support of the need to plan for the growth of Sydney over the next 20 years. The proposed action that will increase Council's data monitoring systems regarding approval and completions of housing diversity and capacity is fully supported.

Priorities and Actions	Property Council Response
Priority 2 – <u>Delivering resilient, healthy and connected communities</u> <u>Actions:</u> 1. Develop community education initiatives to showcase and promote the design of sustainable homes, 2. Investigate the feasibility of incentive provisions for increased energy and water efficiency in new builds, 3. Audit the Camden DCP and investigate opportunities to increase the sustainability of the urban form, 4. Advocate for the development of guidelines that promote sustainability principles in the provision of infrastructure and utility services, 5. Investigate methods to assess and monitor the walkability, liveability and health of future neighbourhoods and renewal projects, 6. Advocate to the NSW Government for a review of s7.11 to include social infrastructure as essential infrastructure within contribution plans, 7. Establish Urban Tree canopy targets and advocate for opportunities to increase Camden's green cover and urban tree canopy, 8. Develop community education initiatives to raise awareness of the importance of green grid and support for increased planting and green cover.	The Property Council supports Council implementing Priority 2 and the eight (8) associated actions. In particular, we welcome Council's intention to focus on sustainability and healthy communities and would support the use of incentives to deliver better sustainability outcomes for energy and water use new housing developments. We are aware of the issues with the current Essential Works List that forms part of the IPART local contribution plan review process and the outcome of the Productivity Commissioner review process will help Council determine the next steps for taking this issue forward.

Priorities and Actions	Property Council Response
<u>Priority 3 – Delivering the right housing in the right location</u> Actions: 1. Explore developing guidelines to protect and facilitate the staged delivery of high-density housing in appropriate locations, 2. Finalise the Leppington Town Centre Review to identify opportunities for jobs and housing in close proximity to Leppington train station. 3. Ensure the Oran Park Town Centre Master Plan Review is undertaken to support future job and housing growth in close proximity to the future Oran Park Town Centre train station, 4. Undertake a review of existing land uses and planning controls within Narellan Town Centre to identify appropriate land use mixes and potential capacity to facilitate job and housing growth. 5. Undertake a review of land use and development controls within the Camden Town Centre to ensure any job and housing growth can be sensitively accommodated, 6. Review land use and development controls in residential zones of the Camden LEP to ensure any infill development is appropriate and respects neighbourhood character and amenity, 7. Explore developing a pilot Local Character Statement and Overlay with DPIE to guide the future character of Cobbitty Village, 8. Complete the Heritage Review, 9. Investigate the introduction of appropriate land zoning to mitigate potential land-use conflicts between urban and rural land uses. 10. Finalise the Scenic and Visual Landscapes Analysis.	The Property Council supports Council implementing Priority 3 and the ten (10) associated actions. In particular, we welcome the further work that will be carried out in respect of Leppington, Oran Park, Narellan and Camden town centres to support job and housing growth. Also, we support the development of guidelines that will facilitate high density housing in appropriate locations and would welcome the opportunity to review these in draft form as part of a formal/informal consultation process. Given the significant boost to housing supply that is being provided within Camden's growth areas, we support Council identifying the need to protect significant heritage and character areas such as Cobbitty Village and protecting its rural lands beyond the current growth areas. The finalisation of Council's Scenic and Visual Landscapes Analysis is supported.

Priorities and Actions	Property Council Response
<u>Priority 4 – Increasing housing choice and diversity</u> <u>Actions:</u> 1. Investigate the development of a Housing Density and Diversity Guide to inform planning controls in the review or rezoning of SWGA precincts, 2. Review the locational requirements for medium density housing within the Growth Centres SEPP, 3. Explore innovative approaches to planning that encourage the viable delivery of medium density housing within the SWGA, 4. Review planning controls in the EPIs and DCPs for Seniors Housing to ensure a consistent approach is adopted across the LGA, 5. Complete a needs analysis for Specialist Disability Accommodation (SDA), Supported Independent Living (SIL) housing and Adaptable and Accessible Housing Design to better support people with a Disability, 6. Investigate options to facilitate liveable design features in more homes.	The Property Council supports Council implementing Priority 4 and the six (6) associated actions. In particular we encourage Council to pursue initiatives that will increase housing choice and diversity, particularly actions that will support housing for seniors and smaller households. We encourage Council to work closely with the housing industry regarding the any proposed access and design standards to ensure those changes are feasible and can be readily adopted into housing designs.
<u>Priority 5 – Addressing housing affordability</u> <u>Actions:</u> 1. Prepare an Affordable Housing Strategy and Affordable Housing Contribution Scheme for the Camden LGA in collaboration with the partner councils of the Western City and Blacktown, 2. Work with the Land and Housing Corporation to support the renewal of social housing within the LGA, in line with the Future Directions for Social Housing in NSW. 3. Work with community housing providers in the LGA to assist delivery of well-designed affordable housing, 4. Advocate that affordable rental housing delivered through State Planning Policies is well designed and offered at affordable rental rates, 5. Investigate developing policy regarding homelessness in the Camden LGA.	The Property Council generally supports Council implementing Priority 5 and the five (5) associated actions. In particular, we welcome Council taking steps to address housing affordability in partnership with other Western City District councils and look forward to the opportunity to review the draft strategy and scheme. Council has identified an appropriate suite of actions to contribute towards addressing this important issue, including working with LAHC to support renewal of social housing that will better meet the physical and social needs of its residents.