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22 February 2021

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

Email – lep@georgesriver.nsw.gov.au

Dear Ms Connolly,

Local Environmental Plan (LEP) 2021

The Property Council of Australia welcomes the opportunity to provide Georges River Council (Council) with comments 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. The following comments are provided for your consideration.

The Planning Proposal seeks to identify additional housing opportunities within the Georges River local government area (LGA) and will provide for at least 300 additional dwellings. We support the measures contained within the proposal as they will contribute to greater housing diversity close to public transport and other amenities. We support Council taking steps to progress implementation of new housing opportunities set out in its local strategic planning statement and local housing strategy.

Should you have any questions regarding the content of this submission, please contact Troy Loveday, NSW Policy Manager, on 0414 265152 or tloveday@propertycouncil.com.au

Yours sincerely



Jane Fitzgerald
NSW Executive Director
Property Council of Australia

Submission to Georges River Council

Local Environmental Plan 2021 (LEP21)

22 February 2021

1.0 Introduction

The Property Council welcomes the opportunity to respond to the public exhibition of LEP21 to amend Council's local planning controls to deliver improved housing opportunities.

It is noted that the introduction to Planning Proposal report states:

'The purpose of this Planning Proposal, known as LEP21, is to create additional housing capacity within the Georges River LGA and to rectify a number of issues unresolved by the planning proposal for the Georges River Local Environmental Plan 2020'.

Council has been informed by the Department of Planning, Industry and Environment (the Department) that there is a shortfall of housing delivery within the Georges River LGA. Council has been asked to create additional capacity to meet the Greater Sydney Commission's 6 to 10-year housing target of between 3,450 and 4,250 additional homes for the period between 2021 and 2026.

We welcome the exhibition of this planning proposal and its subsequent implementation to deliver greater housing supply and diversity for the Georges River LGA.

The Property Council wrote to Council in June 2020 in response to the concurrent exhibition of its draft Local Housing Strategy and the Georges River draft LEP 2020. At the time, we supported the implementation of updated planning controls that would give effect to the GSC's housing targets for Council.

Although the primary purpose of the Georges River LEP 2020 was to harmonise the planning controls under the former Hurstville City Council and Kogarah City Council, the need to meet South District housing targets formed part of the proposal. We encourage Council to consider the need to plan for additional capacity beyond its planned targets due to targets not being fully realised. The current proposal goes some way to redress this issue.

2.0 LEP21 - Housing Capacity

We understand this proposal represents a newly identified stage in Council's LEP Review Program, following consolidation into a new instrument in 2020 and before the Housing Choice LEP that will be prepared in 2022. The decision made by Council in November 2020 to amend its program to deliver additional housing in 2021 is appropriate and fully supported.

The Gateway determination issued to Council by the Minister's delegate makes some important changes to the planning proposal, which we support. The removal of the proposed permissibility amendments for 'manor house' and multi dwelling housing' are appropriate. We encourage local planning provisions that support and do not hinder the development of housing types that are permitted under the *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (Codes SEPP)*.

2.1 Intent of the Planning Proposal

The Planning Proposal is intended to achieve the following outcomes:

- Identify additional housing opportunities in the LGA through a review of future housing growth areas nominated by the *Local Strategic Planning Statement 2040*;
- Contribute to the supply and diversity of housing within the LGA by creating capacity for an additional 300 dwellings through the rezoning of the Narwee Housing Investigation Area, which is one of the six future housing growth areas identified by the LSPS 2040;

- Ensure sensitive use development as defined under the Hazardous Industry Planning Advisory Paper No. 4 ("HIPAP 4") are restricted on No 1, 3, 5, 7, 9, 11 and 13 Berrille Road, Narwee;
- Introduce minimum lot size controls for 'manor houses' and 'multi dwelling housing (terraces)' to apply to development applications carried out under LEP 2020 and complying developments carried out under the *Low Rise Housing Diversity Code* in the Codes SEPP;
- Introduce minimum lot width controls for 'manor homes' and 'multi dwelling housing (terraces)' to apply to development applications carried out under LEP 2020;
- Resolve mapping anomalies that were not included in LEP 2020 on the following sites (199 Rocky Point Road, Ramsgate & 33 Dora Street, Hurstville) and
- Increase the maximum building height for the Hurstville – Hillcrest Avenue Housing Investigation Area which was rezoned in LEP 2020 to enable residential flat building developments of four storeys which are compliant with the *Apartment Design Guide*.

The Property Council supports the intention of the planning proposal that has been developed by Council.

2.2 Narwee Housing Investigation Area

Council is seeking feedback on the Narwee Housing Investigation Area which is located to the south of Narwee town centre and comprises an area of approximately 6.5 hectares. The land is currently zoned R2 Low Density Residential and consists of mostly detached dwelling houses. We welcome the proposed rezoning of this investigation area at Narwee and would request that Council satisfy itself that the size of the precinct proposed for rezoning is adequate to meet Council's future housing needs.

The Planning Proposal involves changing the land use zone for the western half of the investigation area to R4 High Density Residential (1:1 FSR and 13m building height) and the eastern half to R3 Medium Density Residential (0.7:1 FSR and 9m building height). These proposed planning controls are expected to deliver 407 additional dwellings (107 existing and 300 new) in the form of manor houses, terraces, townhouses and small apartment buildings. Council expects that the consolidation of lots under these controls will be easily achieved as the proposed minimum lot size will only require the consolidation of two lots.

Council must be satisfied that any other development requirements that apply to the investigation precinct (such as Council's DCP, technical codes, engineering standards) do not hinder the achievement of the housing target for the precinct (ie net increase of 300 dwellings). Should these testing of the precinct's planning controls find that this target cannot be achieved, Council must consider increasing the size of the investigation area to offset the impact of these development controls.

3.0 Conclusion

The planning proposal that Council has prepared and placed on exhibition provides a vehicle for Council to meet its short to medium-term housing targets that apply under the Greater Sydney Regional Plan and South District Plan. We congratulate Council and the Department for initiating these planning amendments to support housing supply and diversity.

We encourage Council to consider how greater diversity of housing can be achieved within its housing investigation areas. The proposed Narwee Housing Investigation Area is a positive step forward for Council to achieving the housing targets needed for future population growth within the South District and the Georges River LGA. We look forward to the finalisation of this planning proposal and the plan being made by the Minister for Planning and Public Spaces in due course.