



Mr Ron Moore
General Manager
Camden Council
PO Box 183
CAMDEN NSW 2570

Dear Mr Moore

Draft Camden Council Local Housing Strategy 2020

Thank you for submitting Camden Council's Local Housing Strategy (LHS) to the Department for the Secretary's approval.

The Department commends Council on preparing a robust evidence base to support its LHS, providing Council with a clear understanding of the housing needs of the Camden local government area and a strong commitment to strategic planning.

I can confirm that I have determined to approve the draft Camden LHS dated October 2020. My decision reflects the analysis undertaken to develop a comprehensive strategic planning and evidence base to inform your LHS and deliver 12,700 – 15,200 dwellings for the period 2021-26.

In doing so, I have also determined that the approval is granted on the basis that:

- The LHS addresses housing supply, including the 6-10 year housing target, to be delivered predominantly through the current pipeline and existing capacity.
- The Department is satisfied that Council has a solid foundation from which to secure sound housing diversity and affordability outcomes, subject to imposition of the recommended requirements of approval and Advisory Notes.
- The LHS is generally consistent with Section 9.1 Directions and SEPPs.
- The LHS is consistent with the Western City District Plan, subject to the requirements identified below and demonstrates good alignment with the Camden LSPS.

The approval is also subject to the following requirements:

1. Within four (4) weeks of Council endorsing the LHS the Department is to be provided with a copy of endorsed LHS (including any amendments arising from the public consultation). A summary of key themes raised during consultation, Council's response, changes to the LHS and a copy of Council's resolution should also be provided. The Department will review and consider any changes to the LHS after its endorsement and decide if there is need to revise the requirements of the Department's approval.
2. Council is to revise its Local Housing Strategy to incorporate the new approaches and timing for the strategic planning for the South West Growth Area, given the Lowes Creek Maryland and Leppington (Stages 2 and 5) Precincts are currently being

finalised, and that the Pondicherry Precinct is being progressed under two planning proposals.

3. Within four (4) months of Council endorsing the LHS, Council is to prepare an updated and prioritised Implementation and Delivery Plan that clearly articulates the actions, roles and responsibilities and timing to facilitate housing supply, diversity and affordability between 2021 and 2026 and beyond. The Plan should be prepared in consultation with DPIE, TfSNW, Sydney Water, and the Western Sydney Planning Partnership, to ensure any critical interdependencies are satisfactorily resolved.
4. Council is to provide further detail on how the delivery of dwellings will be sequenced in line with infrastructure provision. Council indicates this will be done through the SWGA Infrastructure Study which is a short-term action and has not been finalised.
5. Council is to work with the Department to confirm the 10+ year forecast for the Camden LGA to give effect to the Western City District Plan which requires local councils to identify capacity to contribute to the District's 20-year strategic housing target.
6. Council is to consult with the Department during the development of its Centres and Employment Lands Strategy, and in doing so, demonstrate how Council is balancing employment and housing particularly around future North South Rail Link Station locations.
7. Council is to manage and expedite planning proposal processes, particularly where they will secure diversity and affordability outcomes and in particular support key cohorts such as seniors housing, key worker housing, affordable housing and other typologies that suit the changing needs of existing and future households in identified investigation areas.
8. Action 27 of the LHS is to be amended to commit Council to identify how it can also achieve housing diversity outcomes for areas outside of the South West Growth Area (SWGA). Implementation of Action 27 of the LHS should also include and consider potential changes to Council's LEP. Council is encouraged to support diversity opportunities through relevant planning proposals, where appropriate.
9. Priority 5 of the LHS is to be amended to include an Action for Council to consider the outcomes of the Western Sydney Housing Affordability Strategy when finalised. Council is to prepare an Affordable Housing Contribution Scheme (AHCS) that commits Council to examining the feasibility of levying affordable housing contributions for any new planning proposals that would result in development uplift or an increase in land value. This will ensure that planning proposals give effect to the District Plan, Action 18 to prepare an AHCS.
10. Council is to examine ways to resolve fragmentation issues for greenfield areas to help unlock rezoned land for development. Noting that Liverpool City Council is also embarking on similar work for land in the SWGA, it is encouraged that both councils work together on this endeavour.
11. Council is to undertake a review of the LHS in 2022/23 following release of the updated Western City District Plan / Future Transport 2056 Plan. The outcomes of the review and any updates to the LHS are to be submitted to the Department for approval.
12. Further consideration should be given to prioritising growth precincts and articulating their housing needs particularly as the North South Rail Link station locations are confirmed. In the interim, the LHS should be updated to identify future North South Rail Link stations at Oran Park and Narellan as "possible" or "potential".
13. Council is to prepare principles for assessing proponent-initiated requests for planning proposals, including out-of-sequence criteria to consider any additional opportunities for growth that are not identified in its LHS, or for urban renewal opportunities.

14. The direction and strategic planning approaches endorsed in any State-led strategies or plans are to prevail in the event of any inconsistency with this approval and/or the Council's LHS (as revised and current).
15. Council is to update or revise the LHS to inform Council's updates/revision to its local strategic planning statement following the making of a future District Plan.

Implementing your Local Housing Strategy

The State Government is committed to reducing the time taken to complete planning proposals that support housing delivery by tailoring the steps in the process to the complexity of the proposal, and by providing clear and publicly available justification for each plan at an early stage.

To meet these commitments, a detailed implementation plan is required. This should reflect a comprehensive work program for all strategic planning work Council commits to undertake to implement its LHS and should include but not be limited to the 37 Actions in the LHS Implementation and Delivery Plan.

Local Housing Strategy Reviews and Updates


We strongly recommend that Council review and revise (where required) its LHS before the Local Strategic Planning Statement (LSPS) is required to be reviewed by the Greater Sydney Commission. This will help best inform the next update to the LSPS.

It will also provide Council with the opportunity to improve and clarify aspects of the LHS. The advisory notes provide specific guidance on matters that Council is encouraged to consider when updating the LHS. The Department will expect these same matters to be addressed in planning proposals and will be reinforcing them through Gateway determinations as an interim measure in the absence of the Department's LHS review process.

Once again, I would like to take this opportunity to acknowledge the significant amount of work your team has undertaken to develop the LHS. Please be advised that the LHS will be published on the NSW ePlanning Portal alongside the Department's letter of approval and advisory notes.

Should you have any further questions, please contact Dominic Stefan, Specialist Planner on 02 8275 1024.

Yours sincerely



Amanda Harvey
Executive Director
Local Strategies and Plan Making

25 June 2021

Encl: Camden Council LHS Advisory Notes



Camden Council Local Housing Strategy

Advisory Notes

The following advisory notes identify the further work Council will need to undertake to strongly position future planning proposals and further iterations of the Local Housing Strategy (LHS). The advisory notes provide specific guidance on matters that Council is encouraged to consider when updating the LHS. The Department will expect these same matters to be addressed in planning proposals (where relevant) and that these will be reinforced through Gateway determinations as an interim measure in the absence of the LHS review process.

Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
General	
Implementation	Future iterations of the LHS should be underpinned by an implementation plan with a priority work program, clearly defined roles, responsibilities and definitive timeframes with risks and dependencies identified. The Plan should be prepared in consultation with DPIE, Transport for NSW (TfSNW) and the Western Sydney Planning Partnership, to ensure any critical interdependencies are satisfactorily resolved. This is encouraged to be informed by resourcing and budgets to demonstrate how housing targets will be delivered. The implementation plan should specifically address work streams related to items identified in the 37 LHS Actions.
Review and monitoring framework	Revisions to the LHS may be required in response to significant changes in the LGA such as announcements on new infrastructure investment and employment opportunities, significant changes in projected population growth or updates to the LSPS. The framework should also review the supply and delivery of housing, including the 6-10 year housing target and targets for medium-density and seniors housing.
Infrastructure	Future iterations of the LHS should detail the key local and State infrastructure commitments and investment decisions that will support the unlocking of housing supply. This analysis should consider public and active transport, education and health facilities, open space, community infrastructure, drinking supply, wastewater and utility services. Council is encouraged to cross reference any endorsed Council strategies and plans, where relevant, and collaborate with DPIE and other State agencies (and in particular School Infrastructure NSW (SINSW), Sydney Water and TfNSW) to ensure identified opportunities are realistic and accurately reflect staging, sequencing, servicing and delivery of critical infrastructure such as public transport, education facilities and drinking supply and waste water services. Thresholds/triggers, funding, responsibilities for delivery and indicative timeframes should also be identified.



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
<p>Making appropriate provision for any additional housing opportunities that may arise out of sequence</p>	<p>The inclusion of a transparent and robust framework to consider additional opportunities will assist Council, the Department and other relevant agencies to assess proposals that are inconsistent with the LHS. It will also ensure that changes to land use or development controls do not take place without demonstrating strong strategic merit. Council is encouraged to develop a framework within which to consider such proposals, including but not limited to the following heads of consideration:</p> <ul style="list-style-type: none"> • Strategic merit and case for change • Robust demographic evidence • Housing Affordability and Diversity • Demand analysis and economic impacts • Infrastructure delivery and funding to be borne by the proponent • Stakeholder consultation and outcomes • Sustainability and resilience
<p>Community and Stakeholder Engagement</p>	<p>Incorporate the findings of any future relevant community and stakeholder engagement.</p>
<p>Consultation and engagement with agencies</p>	<p>Council should continue consultation with the following agencies:</p> <ul style="list-style-type: none"> • TfNSW in relation to <ul style="list-style-type: none"> ○ planning for city-shaping & city-serving transport initiatives in Future Transport 2056 and alignment with Council-led transport infrastructure initiatives, and ○ potential future stations at Oran Park and Narellan as part of master planning for the town centres. • Western Parkland City Authority (WPCA) and the Department as part of Council’s South West Growth Area (SWGA) Infrastructure Study and specifically to determine the most effective governance arrangements for coordinating essential service providers as part of the SWGA Infrastructure Study. • SINSW: <ul style="list-style-type: none"> ○ Prior to the finalisation of any future strategy or planning proposal that proposes a significant increase in the number of dwellings; and ○ When Council is aware of variations in the following: <ul style="list-style-type: none"> - The actual number of lots or dwellings varying from planning proposal estimates / strategic plans. - An emerging demographic that varies from the planned population profile, either with more or less families with children.



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	<ul style="list-style-type: none"> - Rates of development and dwelling take-up varying from planned release programs or forecast residential take-up rates. <p>This is to ensure SINSW specifically understands where growth, or changes to growth rates are occurring and can effectively respond by targeting appropriate resourcing to impacted Government schools.</p> <ul style="list-style-type: none"> • The Department in relation to: <ul style="list-style-type: none"> ○ the application and ongoing effectiveness of SEPP - Sydney Region Growth Centres; ○ potential opportunities to unlock barriers posed by the challenges of land fragmentation and its impact on the expected levels of housing delivery; ○ proposed changes to the planning framework and timing for SWGA Precincts - Lowes Creek Maryland and Leppington (Stages 2 and 5). ○ any urban tree canopy Council sets in accordance with Priority 2 of the LHS. <p>Council should also consult with Liverpool Council in relation to:</p> <ul style="list-style-type: none"> • examining land fragmentation issues, and • LHS action 27 <i>'Investigate the development of a Housing Density and Diversity Guide to inform planning controls in the review or rezoning of SWGA precincts'</i>
Affordable Housing	<p>Council's LHS evidence base is considered sufficient to justify the preparation of a SEPP70 Affordable Housing Contribution Scheme (AHCS). An LHS requirement of approval is included for Council to prepare a scheme that sets out delivery and rent models, tenant eligibility criteria, tenancy allocation, asset ownership and management. Notwithstanding potential issues related to development feasibility, Action 18 of the Western City District Plan requires Council to prepare an AHCS. The scheme would be prepared in advance of any out-of-sequence planning proposals and sends a critical signal to the market regarding Council's strategic planning intentions with regard to affordable housing provision. It will also commit Council to examining the feasibility of affordable housing contributions for all new proposals that are likely to result in an uplift of land value. If feasible and appropriate, affordable housing contributions would be required by LEP provisions that implement the contributions scheme. The scheme should be prepared in accordance with the <i>Greater Sydney Region Plan</i> key parameters for successful implementation of Affordable Rental Housing Targets and the NSW Government's <i>Guideline for Developing an Affordable Housing Contribution Scheme</i></p> <p>Council should continue to work with other councils in the Western Sydney Planning Partnership to assess options and the viability of affordable rental housing as part of the development of an Affordable Housing Strategy and AHCS.</p>



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
Seniors housing	Council is encouraged to investigate the inclusion of seniors housing provisions in its LEP that increase the supply of housing for seniors and people with a disability.
Interdependencies with relevant local evidence base	<p>Incorporate the findings and outcomes of latest studies, policies and State-led precinct plans prepared since the publication and release of the LHS, including but not limited to:</p> <ul style="list-style-type: none"> • Centres and Employment Land Strategy, • Green and Blue Grid Analysis, • Heritage Review, • Visual and Scenic Landscapes Study, • Western Sydney Aerotropolis Plan, • Western City Affordable Housing Strategy, • SWGA Structure Plan (planned), and • Sydney Water Growth Servicing Plan 2020-2025 (recently updated).
Structure Plan	Future iterations of the LHS should include a structure plan(s) that clearly identifies housing growth areas/precincts and their anticipated delivery over the short, medium- and longer-term horizons. Annotations to identify likely yield ranges and any key threshold assumptions should also be included.
Data	
Clarification of 6-10 year target and 10-20 year housing forecast.	<p>Revisions to the LHS should provide a breakdown of how the 6-10 year target will be achieved, including when and where anticipated supply will be delivered and explain market take-up rates. LHS revisions will also need to include a revised housing delivery forecast for the 10-20 year period as new information becomes available.</p> <p>Council should ensure that all population and dwelling forecasts are cross-checked against published DPIE projections to provide greater transparency. Additional guidance and support can be arranged with the Department’s Evidence and Insights team to resolve any discrepancies in dwelling forecasts</p>