



Hawkesbury City Council

attachment 2
to
item 247

Summary of Submissions

date of meeting: 8 December 2020
location: council chambers and
by audio-visual link
time: 6:30 p.m.

Attachment 2 – Summary of Submissions – Draft Local Housing Strategy

Submission	Submission Issue	Key Considerations
Various	<p>Requests the inclusion of Oakville/Maraylya as an Investigation Area for residential development.</p> <p>Supports identification of Oakville area as a potential future residential land release area, given its location near Box Hill and Vineyard Growth Precincts and existing transport networks.</p> <p>Suburbs are predominantly zoned RU4 Primary Production Small Lots and permits a range of small primary industries and associated residential supporting uses. The suburb does not necessarily provide primary agricultural land like area in the LGA zoned RU1 Primary Production.</p> <p>The Outer Sydney Orbital has stopped at Richmond Road and will no longer go any further north east to Vineyard/Windsor Road or to Maraylya.</p> <p>Oakville is impacted by environmental constraints including the presence of threatened species, bushfire prone land and limited flooding. This is not uncommon in the LGA and should not preclude council considering this area for its suitability to accommodate additional residential accommodation.</p> <p>Only broad mapping of threatened species in the area has been currently mapped, and further detailed investigations of precise constraint is required. There may be an opportunity for a biodiversity off set scheme should the area be suitable for additional residential development.</p> <p>Oakville shares a common boundary with the suburbs of Box Hill and is located approximately 2 km from the Box Hill Growth Centre Precinct. The precinct forms part of North West Growth Centre release area. Oakville represents a natural extension of the growth centre release area.</p> <p>This is consistent with the strategic direction and actions set out in the Draft Strategy which seek to maintain a long term supply of residential land. The Strategy identifies the area north of vineyard stage 1 and 2 areas as a potential investigation area subject to the finalisation of Outer Sydney Orbital. This area is not impacted by the Outer Sydney Orbital corridor.</p> <p>The Strategy recommends that Council undertake environmental investigations of these area to determine future development potential.</p> <p>Strongly supports the action and encourage council to undertake investigations into the</p>	<p>The Greater Sydney Commission and Department of Planning, Industry and Environment through the Greater Sydney Region Plan, and Western City District Plan have provided housing targets and projections for each Local Government Area to meet.</p> <p>In the case of the Hawkesbury Local Government Area, the 5 year housing target is 1,150 dwellings, with a projected 2036 population of 77,048 which represents an increase of approximately 10,000 people from the 2016 population of 67,083.</p> <p>The Draft Local Housing Strategy has provided an evidence based approach to making decisions associated with housing needs and locations. The Draft Strategy has identified that there is sufficient land zoned to meet the target and projected population.</p> <p>It was also considered by Council that these projections should be considered further given the following considerations:</p> <ul style="list-style-type: none"> • The designation of much of the City within the Greater Sydney Commission's Metropolitan Rural Area • Infrastructure NSW - Resilient Valley, Resilient Communities Hawkesbury Nepean Flood Strategy and the implications of incorporating the Probable Maximum Flood into planning strategies • Deferral by the NSW State Government of consideration of the Outer Sydney Orbital Corridor through the Hawkesbury Local Government Area • Level of significant

	<p>potential for the Oakville area (or part of it) to be released for additional residential accommodation to meet the needs of the community.</p> <p>Oakville has practical unconstrained land to meet housing targets</p> <p>Natural progression of development to unconstrained land from the Gables and Hills of Carmel</p> <p>The changing dynamic of Oakville – no longer rural</p> <p>Higher rates with lowering land values</p> <p>High percentage of elderly residents who have retirement money locked up in the land</p> <p>The M9 uncertainty should NOT be an excuse not to rezone. If the council can substantiate rezoning then the M9 route can be changed</p> <p>How can they investigate areas on the western side of the river with no infrastructure (Kurmond/Kurrajong/North Richmond). The Richmond bridge is a disgrace and the adjoining roads are all single lanes. More cars on the road will be a disaster for that area</p> <p>The elected Council is not supporting the community views (particularly those views of the Oakville residents)</p> <p>Rezone the land. Rezoning would give Council an enormous boost in development contributions and rates and make the Council more liable for the future.</p> <p>Waiting for the final route of the M9 is not the right decision, as it could take years, and a change in Government might scrap it completely.</p>	<p>constraints (bushfire, RAAF ANEF Noise Contours, significant areas of high biodiversity, significant cultural heritage)</p> <p>The Draft Rural Lands Strategy notes that land in the Oakville – Maraylya localities has been the subject of a number of submissions to the Draft Housing Strategy exhibition requesting that the land is to be rezoned to allow urban development in to be the same as the land on the eastern side of Boundary Road in The Hills LGA.</p> <p>It is also noted that the Housing Strategy has identified that there is not an identified need additional investigation areas given the fact that existing residential zonings are sufficient to meet the target/population projections provided by the Greater Sydney Commission and Department of Planning, Industry and Environment.</p> <p>The Draft Rural lands Strategy has identified this land to be zoned as Rural Landscape and it is not a significant agricultural area with 5.5% of the total land being agriculture and 87.2% of its land use as rural residential. It does not have as many physical constraints for urban development not being flood prone and not having high bushfire prone land.</p> <p>Infrastructure is a key consideration for any investigation area, including roads, services and community infrastructure, the planning for which is long term. A key consideration in this respect is the Outer Sydney Orbital. At this stage, the Outer Sydney Orbital Road corridor does not extend beyond Richmond Road and its route to the north of this has not yet been determined. Transport for NSW have indicated that the extension of the Outer Sydney Orbital is subject to Future</p>
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		<p>Investigations for connections to the Central Coast. Corridor locations will need to be known before any future investigations can occur into the future land uses of the land.</p> <p>It is important that Council continue to liaise with Transport for NSW to understand the timing of further investigations into the corridor location in order to provide a greater level of certainty to Council and the community.</p> <p>As such the Draft Strategy has not identified further Investigation Areas.</p>
2	<p>The Property Council generally supports these actions as they are positive initiatives that have potential to achieve their intended effect. It is important that any policy measures Council takes to encourage the supply of new housing in its urban release areas can provide an effective boost to meeting Council's housing targets.</p> <p>The Property Council supports Council taking steps to encourage infill development in existing centres such as Windsor & Richmond. The other actions identified may contribute towards additional supply, subject to appropriate sites being available. If undeveloped sites exist, it may be appropriate for Council to examine the reasons why they remain undeveloped and consider actions to overcome any obstacles.</p> <p>The Property Council generally supports Council taking steps to increase the supply of smaller dwellings, particularly in the LGA's major centres close to amenities and transport.</p> <p>The Property Council generally supports more affordable housing and the provision of affordable rental housing for very-low and low income earners.</p> <p>The Property Council supports Council committing to maintaining a long-term supply of residential land. Given the environmental constraints affecting land within the Hawkesbury LGA, where suitable land exists it should be identified early and appropriate zoned to provide an incentive for long term development into the future.</p> <p>The Property Council supports Council's efforts to monitor housing supply and delivery. This information should be coordinated with DPIE which produces an annual Housing Supply</p>	Submission noted

	<p>Forecast for Sydney and other data on housing that may be used as a starting point for Council to develop its own database.</p> <p>The Property Council welcomes and supports Council tasking steps to address homelessness within the Hawkesbury LGA.</p>	
3	<p>Inclusion of 254 Ha site at Terrace Road, North Richmond as an Investigation Area for residential purposes – site currently used as a dairy farm.</p> <p>Update the Strategy demand forecasts with current market changes due to increased demand due to the impact of COVID-19 on housing choice</p> <p>Update the Strategy to promote development in areas that are not heavily constrained by flooding, ecological and ANEF issues.</p>	<p>The Greater Sydney Commission and Department of Planning, Industry and Environment through the Greater Sydney Region Plan, and Western City District Plan have provided housing targets and projections for each Local Government Area to meet.</p> <p>In the case of the Hawkesbury Local Government Area, the 5 year housing target is 1,150 dwellings, with a projected 2036 population of 77,048 which represents an increase of approximately 10,000 people from the 2016 population of 67,083.</p> <p>The Draft Local Housing Strategy has provided an evidence based approach to making decisions associated with housing needs and locations. The Draft Strategy has identified that there is sufficient land zoned to meet the target and projected population.</p> <p>It was also considered by Council that these projections should be considered further given the following considerations:</p> <ul style="list-style-type: none"> • The designation of much of the City within the Greater Sydney Commission's Metropolitan Rural Area • Infrastructure NSW - Resilient Valley, Resilient Communities Hawkesbury Nepean Flood Strategy and the implications of incorporating the Probable Maximum Flood into planning strategies • Deferral by the NSW State Government of consideration of the Outer Sydney Orbital

		<p>Corridor through the Hawkesbury Local Government Area</p> <ul style="list-style-type: none"> • Level of significant constraints (bushfire, RAAF ANEF Noise Contours, significant areas of high biodiversity, significant cultural heritage) <p>With respect to the subject site, the Metropolitan Rural Area context within the Greater Sydney Region Plan and Western City District Plan is of primary consideration. Strategies within these Plans highlight that urban development should be limited to identified investigation areas, none of which are located within the Hawkesbury Local Government Area.</p> <p>Additionally, the Draft Rural Lands Strategy highlights the significance of land in this location towards agricultural production, and should be retained for such purposes.</p> <p>As such the Draft Strategy has not identified further Investigation Areas.</p>
4	Inclusion of a 47 Ha site at Kurmond/Putty and Earl Streets, Wilberforce as a large rural residential development site.	<p>The Greater Sydney Commission and Department of Planning, Industry and Environment through the Greater Sydney Region Plan, and Western City District Plan have provided housing targets and projections for each Local Government Area to meet.</p> <p>In the case of the Hawkesbury Local Government Area, the 5 year housing target is 1,150 dwellings, with a projected 2036 population of 77,048 which represents an increase of approximately 10,000 people from the 2016 population of 67,083.</p> <p>The Draft Local Housing Strategy has provided an evidence based approach to making decisions associated with housing needs and locations. The Draft Strategy</p>

		<p>has identified that there is sufficient land zoned to meet the target and projected population.</p> <p>It was also considered by Council that these projections should be considered further given the following considerations:</p> <ul style="list-style-type: none"> • The designation of much of the City within the Greater Sydney Commission's Metropolitan Rural Area • Infrastructure NSW - Resilient Valley, Resilient Communities Hawkesbury Nepean Flood Strategy and the implications of incorporating the Probable Maximum Flood into planning strategies • Deferral by the NSW State Government of consideration of the Outer Sydney Orbital Corridor through the Hawkesbury Local Government Area • Level of significant constraints (bushfire, RAAF ANEF Noise Contours, significant areas of high biodiversity, significant cultural heritage) <p>With respect to the subject site, the Metropolitan Rural Area context within the Greater Sydney Region Plan and Western City District Plan is of primary consideration. Strategies within these Plans highlight that urban development should be limited to identified investigation areas, none of which are located within the Hawkesbury Local Government Area.</p> <p>Additionally, these Plans released by the NSW State Government identify that rural residential development is not an economic value of the Metropolitan Rural Area and further rural residential development in the Metropolitan</p>
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5	<p>Supportive of Draft Local Housing Strategy, and provided recommendations with respect to Affordable Housing Strategy/Policy matters.</p> <p>Encourages Council to review and update the Affordable Housing Policy based on current and future community needs or develop an informed Local Affordable Housing Strategy in line with the Hawkesbury Local Strategic Planning Statement and Local Housing Strategy moving forward as the next step.</p> <p>Council could target a small number of developments throughout the LGA on well-located sites to provide or receive target affordable housing instead of sprinkling 5% affordable housing in every development project arising from a residential rezoning.</p> <p>Hawkesbury City Council's approach to identifying suitable precincts for affordable housing may facilitate such opportunities. Evolve are keen to work with Council to achieve the SAH target in the Hawkesbury LGA.</p> <p>NSW government is currently investing 36.1M in "Together Home Program" which aims to support rough sleepers across NSW during the COVID-19 pandemic into stable accommodation, linked to</p>	<p>Council is a partner in the Western City District Affordable Housing Strategy 2020 that is currently being prepared. The Objectives of the Strategy are to:</p> <ul style="list-style-type: none"> • Provide context for the need of affordable housing , highlighting the unique demographic and housing market circumstances of each of the following local government areas: Blacktown, Blue Mountains, Camden, Campbelltown, Fairfield, Hawkesbury, Liverpool, Penrith and Wollondilly • Summarise best practice in mandatory affordable housing provision including Australian and international • Provide the basis for a consistent Western City District approach in the

	<p>wraparound supports. Evolve Housing is delivering this program by securing 46 dwellings across South-west Sydney and Western Sydney/Nepean Blue Mountains to provide stable housing as well as the wraparound supports.</p> <p>Evolve Housing has raised concerns with the current limitations of Affordable Rental Housing 2009 SEPP (ARH SEPP) that affordable housing gained from the density bonus uplift will go back to full market rental after 10 years and may not be retained in perpetuity. It is noted that the new Housing Diversity SEPP might further strengthen regulations under AHRSEPP in future. Evolve Housing proposes to work in collaboration with Council to achieve the Council's objective of increasing the supply affordable housing.</p> <p>Secondary dwellings could be perfect smaller housing option at under one third of the cost of conventional construction. This approach presents a low cost and low risk method of delivering additional affordable housing as well as improving under-utilized existing land and infrastructure.</p> <p>A study conducted by Wentworth Community Housing and Western Sydney Community Forum concluded an unmet demand for 2,999 dwellings by 2036 within Hawkesbury LGA. Evolve Housing encourage Council to clearly identify target for affordable housing within the LGA to assist in meeting this demand (p.138).</p> <p>We would encourage Council to expand the housing diversity to include more studios, one bedroom apartments, group homes, senior housing and especially secondary dwellings to suit varied needs of the community. Evolve Housing has been advocating the concept of Secondary dwellings because it serves as a perfect housing option for seniors to age in place and provide much affordable option for students or youth migrating for employment.</p> <p>We note that Hawkesbury Council has more affordable stock available for low to middle income groups as compared to Greater Sydney Region (5.2.7; p.137-138). We also note that there was an unmet demand of 1,929 SAH in 2016 and a shortfall between current supply and forecast demand of 2,999 SAH dwellings by 2036, which indicates 37.5% of the total new dwellings needed (8,000 as per DPIE estimate) to be delivered by 2036 in the area. This contributes to 150 social and affordable dwellings each year. Evolve Housing encourage Council to clearly articulate and investigate options to meet the current and future demand for the SAH and set specific targets to be delivered by 2036. Evolve would be happy to assist the Council in this direction.</p>	<p>requirement for the housing industry to provide for affordable housing across the local government areas</p> <p>It is aimed that at the completion of the project, each of the participating Councils will have:</p> <ul style="list-style-type: none"> • the justification and rationale for affordable housing provision including research of the demand based on current and future projections that lead to conclusive affordable housing targets • a comprehensive Affordable Housing Strategy for inclusion in Local Housing Strategy • associated development contributions plans. <p>It is expected that the Draft Strategy will be completed in the near future for consideration by Council.</p>
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	<p>Evolve Housing agree with Council strategy to continue to work with other all levels of government, the community, local services and agencies to address homelessness. We would be keen to develop any partnership with Council and bring in our experience in wrap-around support or housing solutions for rough-sleepers (Ref – Together home program described earlier).</p>	
6	<p>Highlights level of housing stress in the Hawkesbury and advocates for the adoption of an affordable housing target of 15% of the total floor space of all new residential developments on private land. Further, that 30% of the total floor space of all new residential developments on any State-owned land be allocated to affordable housing</p> <p>Also requests that Council set aside Council-owned land for social housing and advocate to State Government for more investment in social housing in the local area.</p>	<p>As identified above, Council is a partner in the Western City District Affordable Housing Strategy 2020 that is currently being prepared.</p>
7	<p>Supports the Strategy. Support new housing to be concentrated in existing residential zones and consistent with State planning regional strategies. New dwelling approvals need to include information about the types of development permissible in the zone to limit future land use conflict. Also, new housing should only occur when the supporting public infrastructure is started.</p>	<p>Submission noted.</p>
8	<p>One of the key housing needs identified in the Strategy is:</p> <p>Housing a growing population - Around 10,000 additional dwellings will be needed between 2016 and 2036 - Planning controls will need to ensure sufficient zoned land is available to accommodate additional housing.</p> <p>The Strategy identifies a number of options for the future fulfilment of the housing needs of the Hawkesbury LGA, however, a significant avenue for achieving the required growth identified by the Strategy has been overlooked, that being the potential to revise the existing minimum lot size development standards in LEP 2012 as they relate to the existing R2 Low Density Residential zone of LEP 2012.</p> <ol style="list-style-type: none"> 1. R2 Low Density Residential lots in the Glossodia area do not meet the zone objectives. The R2 zone is fragmented into a number of lot sizes. However the minimum lot size is 40 hectares which is more akin to a rural zoned land. 2. The NSW Planning Framework has set future housing targets for Hawkesbury. Rectifying the minimum lot size of these 	<p>The Greater Sydney Commission and Department of Planning, Industry and Environment through the Greater Sydney Region Plan, and Western City District Plan have provided housing targets and projections for each Local Government Area to meet.</p> <p>In the case of the Hawkesbury Local Government Area, the 5 year housing target is 1,150 dwellings, with a projected 2036 population of 77,048 which represents an increase of approximately 10,000 people from the 2016 population of 67,083.</p> <p>The Draft Local Housing Strategy has provided an evidence based approach to making decisions associated with housing needs and locations. The Draft Strategy has identified that there is sufficient land zoned to meet the target and projected population.</p>

	<p>larger R2 Low Density Residential sites to a reasonable size which is within the context of R2 Low Density Residential zone objectives would enable Council to meet its housing targets for the future without the need to rezone land to the R2 Low Density Residential zone.</p> <ol style="list-style-type: none"> 3. The Hawkesbury LGA is classed as Metropolitan Rural Area (MRA) except for Vineyard Precinct. Utilising these already R2 zoned sites to meet the supply of future housing will be in Council's long term planning interest especially when the MRA objectives are impeding further urban development in the Hawkesbury. 4. It is recognised that the Site and surround sites have biodiversity constraints, however, we encourage Council to use a lot size averaging analysis to ensure that the biodiversity is conserved as well as the lot size requirement being reduced to create a win-win situation. 5. Council should think strategically and exploit the currently appropriate zoned land to bank for future local housing demands. 6. Sydney Water has determined that the Site is capable of being serviced with water and sewer infrastructure for up to 150 dwellings such that Torrens Title subdivision with lots significantly below the current 40 hectare minimum lots size could be established. 7. We trust that the Council will consider the proposed reduction in 40 hectare minimum lot size for this R2 Low Density Residential part of Glossodia and make appropriate change to the minimum lot size for subdivision to better accommodate smaller lot subdivision of the locality. 	<p>It was also considered by Council that these projections should be considered further given the following considerations:</p> <ul style="list-style-type: none"> • The designation of much of the City within the Greater Sydney Commission's Metropolitan Rural Area • Infrastructure NSW - Resilient Valley, Resilient Communities Hawkesbury Nepean Flood Strategy and the implications of incorporating the Probable Maximum Flood into planning strategies • Deferral by the NSW State Government of consideration of the Outer Sydney Orbital Corridor through the Hawkesbury Local Government Area • Level of significant constraints (bushfire, RAAF ANEF Noise Contours, significant areas of high biodiversity, significant cultural heritage) <p>With respect to the subject site, the Metropolitan Rural Area context within the Greater Sydney Region Plan and Western City District Plan is of primary consideration. Strategies within these Plans highlight that urban development should be limited to identified investigation areas, none of which are located within the Hawkesbury Local Government Area.</p> <p>Additionally, these Plans released by the NSW State Government identify that rural residential development is not an economic value of the Metropolitan Rural Area and further rural residential development in the Metropolitan Rural Area is generally not supported. Limited growth of rural-residential development could be considered where there are no</p>
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		<p>adverse impacts on the amenity of the local area and where the development provides incentives to maintain and enhance the environmental, social and economic values of the Metropolitan Rural Area. This could include the creation of protected biodiversity corridors, buffers to support investment in rural industries, and protection of scenic landscapes. In the case of the subject site, it does not meet this criteria.</p> <p>Additionally, the Draft Rural Lands Strategy highlights the issue of land conflict and its impact on agricultural land. As such increasing the intensity of existing development on land that adjoins identified agricultural land is problematic.</p> <p>As such the Draft Strategy has not identified further Investigation Areas.</p>
9	<p>No new housing estates should be created beyond the one lane North Richmond Bridge until the bridge is dual lane in both directions and built high enough to withstand any flooding activity.</p> <p>All subdivisions should be on the Sydney side of the Hawkesbury River until roads and bridges are made higher and wider.</p> <p>The areas of Oakville adjacent to The Gables appear to need little if any additional infrastructure and are mainly flood free so would not present the shire with any more traffic problems.</p> <p>There is mention of the Orbital passing through areas North of Vineyard, this is not correct as it was withdrawn by state Government before the last election. Please remove all mention of the Orbital as I have been asked to join a class action against council if the Orbital is mentioned as going through this area.</p>	<p>The Greater Sydney Commission and Department of Planning, Industry and Environment through the Greater Sydney Region Plan, and Western City District Plan have provided housing targets and projections for each Local Government Area to meet.</p> <p>In the case of the Hawkesbury Local Government Area, the 5 year housing target is 1,150 dwellings, with a projected 2036 population of 77,048 which represents an increase of approximately 10,000 people from the 2016 population of 67,083.</p> <p>The Draft Local Housing Strategy has provided an evidence based approach to making decisions associated with housing needs and locations. The Draft Strategy has identified that there is sufficient land zoned to meet the target and projected population.</p> <p>It was also considered by Council that these projections should be</p>

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		<p>is not a significant agricultural area with 5.5% of the total land being agriculture and 87.2% of its land use as rural residential. It does not have as many physical constraints for urban development not being flood prone and not having high bushfire prone land.</p> <p>Infrastructure is a key consideration for any investigation area, including roads, services and community infrastructure, the planning for which is long term. A key consideration in this respect is the Outer Sydney Orbital. At this stage, the Outer Sydney Orbital Road corridor does not extend beyond Richmond Road and its route to the north of this has not yet been determined. Transport for NSW have indicated that the extension of the Outer Sydney Orbital is subject to Future Investigations for connections to the Central Coast. Corridor locations will need to be known before any future investigations can occur into the future land uses of the land.</p> <p>It is important that Council continue to liaise with Transport for NSW to understand the timing of further investigations into the corridor location in order to provide a greater level of certainty to Council and the community.</p> <p>As such the Draft Strategy has not identified further Investigation Areas.</p>
10	<p>DPI Agriculture generally does not support permitting detached dual occupancies or secondary dwellings in rural zones due to the potential for impacts on agricultural land uses, such as capital price increases, and increased risk of land use conflict.</p> <p>DPI Agriculture suggests that all housing supply and demand, including that in rural areas, should have been considered in the local housing strategy. This would have enabled a holistic understanding of the entire housing needs of the LGA and enabled planning for the most efficient way to meet the demand with the</p>	<p>The Draft Strategy provides for consideration of the provision of Detached Dual Occupancies and Secondary Dwellings through a place-based approach that considers the recommendations of the Hawkesbury Rural Lands Strategy.</p> <p>It is considered that such an approach will be able to consider and avoid the issues raised by DPI Agriculture compared to be broad brush change to planning</p>

	<p>least impact on rural land uses. Considering all housing needs in the draft Strategy would also have allowed the rural land strategy to concentrate on planning strategically for other rural land uses and environmental characteristics.</p> <p>While it is noted that the draft Strategy does not specifically state it is proposed to permit these residential development types in rural zones, DPI Agriculture requests that either this direction is removed or that the matter be given very careful consideration during development of the rural land strategy.</p>	<p>provisions within all rural areas.</p>
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