



Hawkesbury City Council

attachment 1  
to  
item 247

Submissions

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



**From:** [REDACTED]  
**Sent:** Fri, 9 Oct 2020 13:51:30 +1100  
**To:** Hawkesbury City Council  
**Cc:** [REDACTED]  
**Subject:** Future Strategic Housing Plan Hawkesbury Council  
**Attachments:** Sub on LHS 08.10.2020.docx, ATT00001.htm

Mr Andrew Kearns  
Manager Strategic Planning

Dear Andrew,  
Please find attached our submission pertaining to the Draft Hawkesbury Local Housing Strategy  
-Oakville Area.

Thank you for the opportunity to do so.

Kind Regards  
[REDACTED]

8<sup>th</sup> October 2020

Hawkesbury City Council  
PO Box 146  
WINDSOR NSW 2756  
[council@hawkesbury.nsw.gov.au](mailto:council@hawkesbury.nsw.gov.au)

Attention: Andrew Kearns – Manager Strategic Planning

Dear Andrew

**RE: Draft Hawkesbury Local Housing Strategy - Oakville Area**

We are the owners of [REDACTED] in the suburb of Oakville in the Hawkesbury local government area (LGA). We appreciate the opportunity to provide feedback on the Draft Hawkesbury Local Housing Strategy (LHS), particularly in relation to the provision of additional residential accommodation to meet the needs of our community over the next 25 years. We note our support for the identification of the Oakville area as a potential future residential land release area, particularly given its location near the Box Hill and Vineyard Growth Precincts, as well as existing transport and services.

The suburb of Oakville is located on the eastern boundary of the LGA. It is predominantly zoned RU4 – Primary Production Small Lots and permits a range of small primary industries and associated residential/ supporting uses. However, the suburb does not necessarily provide 'primary agricultural land' like areas of LGA zoned RU1 Primary Production.

Public transport from the area is provided to Riverstone via Maraylya Bus route, with two bus stops located along Boundary Road. The suburb is located 5.5km from Vineyard Train Station and 8km from Riverstone Train Station. The outcome of the public exhibition of the proposed M9 Motorway and Outer Sydney Orbital (OSO) confirms that the OSO corridor will stop at Richmond Road and will no longer go any further north east – either to Vineyard/Windsor Road or onwards to Box Hill/Maraylya. Thus, the Oakville suburb is not impacted by future road reservation requirements

Like most areas in the LGA, land in 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 necessarily preclude Council considering this area for its suitability to accommodate additional residential accommodation. In particular, only broad mapping is currently available in relation to potential threatened species in the area and further detailed investigations of the precise constraints is required. There may be an opportunity to accommodate a biodiversity offset scheme should the area be found to be suitable for additional residential development.

Oakville shares a common boundary with the suburb of Box Hill and is located approximately 2km from the Box Hill Growth Centre Precinct. This Precinct forms part of the North West Growth Centre which also includes the Vineyard land release precinct (see figure at **Appendix A**). Oakville represents a natural extension of the Growth Centre release area. Despite the potential environmental constraints impacting the Oakville area, it represents a logical extension of the Growth Centre release areas – due to its proximity to existing centres, transport and services – particularly when compared to other locations in the LGA.

This is consistent with the Strategic Directions and Actions set out in the Draft LHS which seek to 'maintain a long term supply of residential land'. The LHS highlights the importance of early identification of future urban areas to 'allow adequate time for planning and infrastructure delivery'. The LHS identifies the area to the 'north of Vineyard Stage 1 and 2 areas' as a potential investigation area subject to the finalisation of OSO. As detailed above, the route for the OSO has now been finalised and the area north of Vineyard Stages 1 and 2 is not impacted by any road corridor requirements.

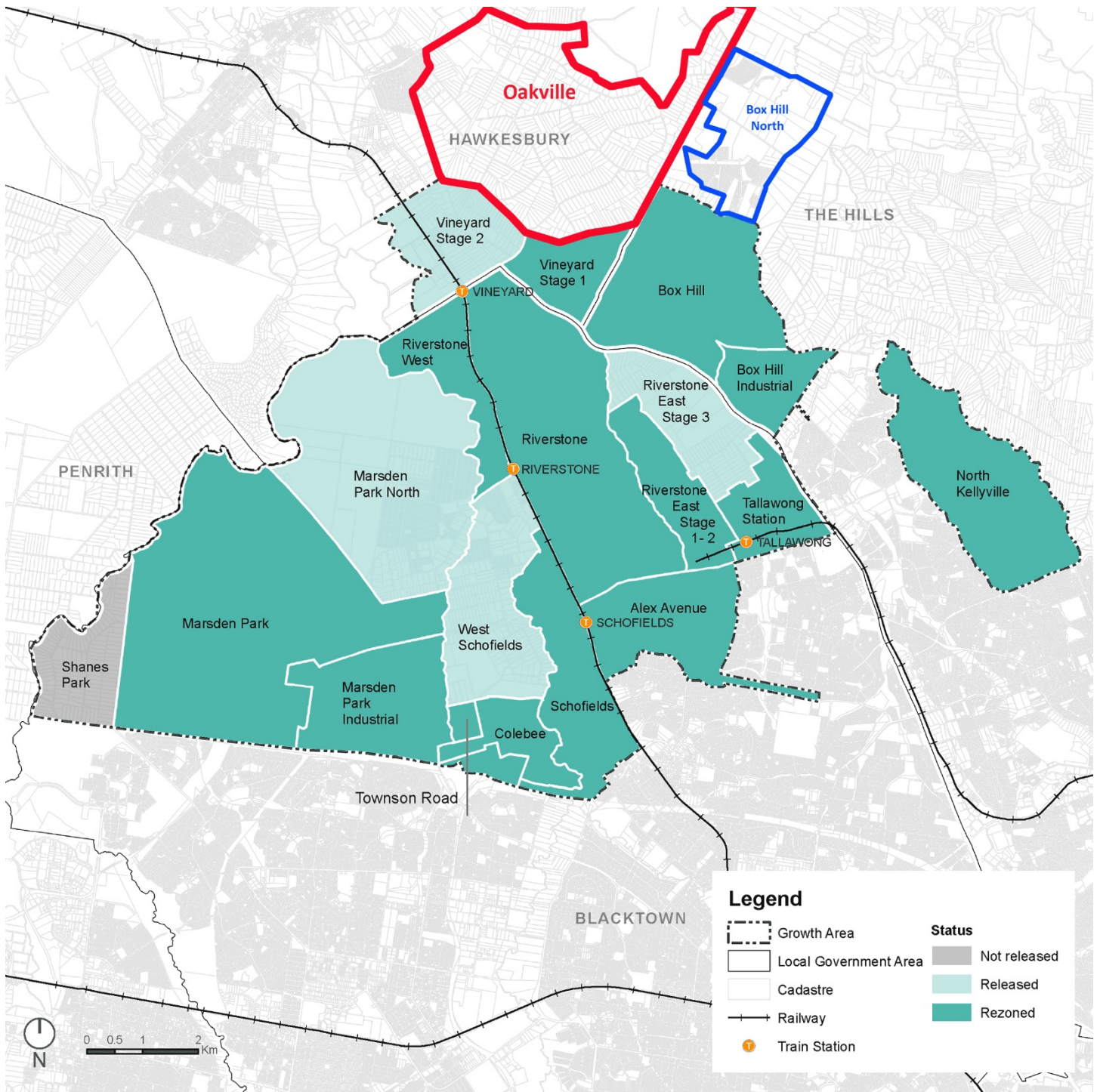
The LHS recommends that Council undertake environmental investigations of these area to determine future development potential. We strongly support this action and encourage Council to undertake investigations into the potential for the Oakville area (or parts of it) to be released for additional residential accommodation to meet the needs of the community. The landowners in the Oakville area would like to work collaboratively with Council and State Government to undertake further investigation and stakeholder consultation as part of the consideration of this area as a future land release.

Thank you for considering this submission. Please contact me on [REDACTED] with any queries.

Regards

[REDACTED]

## **Appendix A – North West Growth Area in relation to Oakville**





**From:** Your Hawkesbury Your Say  
**Sent:** Wed, 23 Sep 2020 10:37:55 +1000  
**To:** Andrew Kearns;Melissa Barry;Hawkesbury City Council  
**Subject:** Anonymous User completed Exhibition of Draft Hawkesbury Local Housing Strategy Submission

Anonymous User just submitted the survey Exhibition of Draft Hawkesbury Local Housing Strategy Submission with the responses below.

**Name**

[REDACTED]

**Address**

[REDACTED]

**Submission**

Please remove any mention of the OSO as it is no longer a policy of the government or the opposition. This greatly affects our property values and selling interest of our properties. Vineyard stage 2 should not be put on hold as the OSO can go anywhere. This is not right to all the property owners which you are meant to represent. Blacktown council and Baulkham Hills council looked after their community and didn't worry about the OSO. Look after your community and remove any mention of the OSO through Vineyard the statement government has.

**Email address**

[REDACTED]



**From:** [REDACTED]  
**Sent:** Wed, 23 Sep 2020 16:29:27 +1000  
**To:** Hawkesbury City Council  
**Cc:** Hawkesbury Parliament  
**Subject:** Draft Hawkesbury Council Local Housing Strategy

TO: THE MANAGER HAWKESBURY COUNCIL

My name is [REDACTED], and I live at [REDACTED], I also have property at [REDACTED] and I am a rate payer.

I'd like to comment on the Draft Local Housing Strategy.

My family and I have lived in Oakville for 20 years and we have seen many changes in the area especially when the M9 Orbital road was proposed around our property, which has now smashed property values.

We were promised by Minister Perrottet that the road would be re-routed, and never go through our property, but the web site still shows it and this is causing our family much stress and anxiety.

We were always living in hope that one day the property would be rezoned and we would be OK when that time came.

The draft Local Housing Strategy shows a few areas in Hawkesbury that are being looked at for future development, but there is little mention of Oakville - WHY?????

I believe that Oakville, which is directly North of the North-West Growth Centre Vineyard stage 2 is an ideal area worth considering. Following are a few points that should be noted:-

- Oakville has practical unconstrained land to meet housing targets
- Natural progression of development to unconstrained land from the Gables and Hills of Carmel
- The changing dynamic of Oakville – no longer rural
- Higher rates with lowering land values
- High percentage of elderly residents who have retirement money locked up in the land
- The M9 uncertainty should NOT be an excuse not to rezone. If the council can substantiate rezoning then the M9 route can be changed

- 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
- The elected Council is not supporting the community views (particularly those views of the Oakville residents)
- There was no issue with council originally approving the development of 300 onsite caravans on the Ingenia site at Commercial road but not we are exempt from future planning.
- Currently on the opposite side of Boundary Road (1.5km away from my property) there is mass development occurring. This level of urbanisation can't be ignored and omitting Oakville from future rezoning considerations will destroy property values, reduce the amount of people living or wishing to live in the Hawkesbury and the increased traffic in from this area will negatively impact Oakville residents. It only makes sense that Oakville is brought into consideration for future development to keep inline with neighbouring suburbs.

Every resident and neighbour we know, would like rezoning!!!. Council should be supporting our views and listen to us as rate-payers!

Rezoning would give Council an enormous boost in development contributions and rates and make the Council more liable for the future.

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.

I look forward to receiving a favourable response to my submission.

Regards



**From:** [REDACTED]  
**Sent:** Mon, 12 Oct 2020 17:51:41 +1100  
**To:** Hawkesbury City Council  
**Cc:** Andrew Kearns  
**Subject:** Submission on Draft Local Housing Strategy & Employment Lands Strategy  
**Attachments:** 201012\_Property\_Council\_Hawkesbury\_City\_Council\_dLHS\_dELS.pdf

Good afternoon,

On behalf of [REDACTED], [REDACTED] please find attached the Property Council's submission on the Hawkesbury Local Housing Strategy and Employment Lands Strategy.

If you have any questions, please contact me.

Thanks

[REDACTED]

[REDACTED]



12 October 2020


Mr Peter Conroy  
General Manager  
Hawkesbury City Council  
PO Box 146  
WINDSOR NSW 2756

Email – [council@hawkesbury.nsw.gov.au](mailto:council@hawkesbury.nsw.gov.au)

Dear Mr Conroy



## Draft Hawkesbury Local Housing Strategy & Draft Employment Lands Strategy


The Property Council of Australia welcomes the opportunity to provide Hawkesbury City Council (**Council**) with comments on the draft Hawkesbury Local Housing Strategy (**LHS**) and draft Employment Lands Strategy (**ELS**).

As  representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes. Please find attached our response to the exhibition of these strategies.

The actions set out in these strategies are generally welcomed and will contribute towards Council meeting its housing and employment targets set out within the *Western City District Plan*. We look forward to Council developing planning proposals to amend the provisions of *Hawkesbury Local Environmental Plan 2012* that will give effect to these strategies.

Should you have any questions regarding the content of this submission please contact   


Yours sincerely  
  




# **Submission to Hawkesbury City Council**

## **Draft Local Housing Strategy & Draft Employment Lands Strategy**

**12 October 2020**

## 1.0 Draft Hawkesbury Local Housing Strategy

### 1.1 General Comments

We acknowledge that Hawkesbury City Council (**Council**) has prepared this draft LHS as a requirement of the Greater Sydney Regional Plan (Action 3) and the Western City District Plan (Action 17). We support the Council undertaking this work at this time ahead of its deadline to update its local environmental plan to align with the Western City District Plan.

In 2018, the Department of Planning, Industry and Environment (DPIE) issued the publication “Local Housing Strategy Guideline” to all local councils which provided a step by step process for councils developing local housing strategies. We note that Council has prepared its LHS to be consistent with the Department’s guideline.

### 1.2 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 in 2020. We applaud Council’s efforts to undertake the strategic planning work required to deliver more housing diversity, especially for seniors and smaller households, and strategies to improve housing affordability.

Together, this LHS and Council’s Local Strategic Planning Statement (LSPS) should identify how medium and long-term housing targets will be achieved. Council’s 6 to 10-year housing target should be informed by this LHS. We support Council accepting this role to identify its own target based on local supply factors.

Council’s draft Strategy indicates:

- Population growing at 0.7% each year between 2006 and 2016.
- DPIE expects population growth to increase to 1.6% between 2026 and 2031.
- Population in 2016 was 67,800 and will increase to 85,050 in 2036.
- Greatest increase will be in age bracket 65 to 84 years – additional 6,100 persons.
- Population aged over 85 will increase from 1,050 to 3,050.
- Households increase from 24,600 in 2015 to 32,000 in 2036.
- DPIE expects additional 8,000 dwellings will be needed in 20 years to 2036.
- This is approximately an additional 400 dwellings per year.
- Between 2016 and 2036 there will be double digit increases in couples only, single parent and multi-family and other-family households.
- Rents and mortgage payments are generally less than the Greater Sydney area.
- 10.5% of Hawkesbury LGA households are experiencing housing stress.
- 8.9% of households experiencing mortgage stress
- 30.2% of households experiencing rental stress.
- 85% of dwellings are detached dwellings
- Approximately 10,000 additional dwellings will be needed between 2016 and 2036.

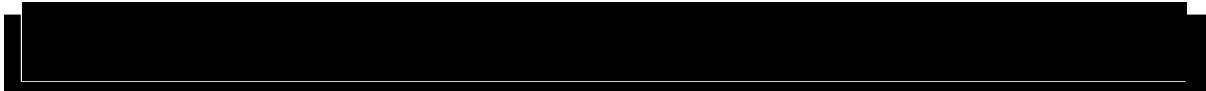
Extensive parts of Hawkesbury LGA are impacted by natural hazards limiting urban expansion or intensification, including flooding and bushfire. Other significant constraints on development include biodiversity, heritage and aircraft noise from the RAAF base at Richmond. Nonetheless, theoretical capacity for new housing exists in Windsor, Richmond, North Richmond, Hobartville and Vineyard.

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

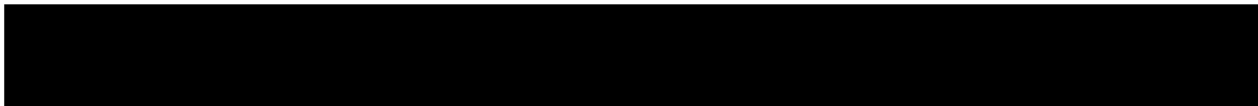
### **1.3 Strategies and Actions**

Section 6 of the LHS sets out Council's intended strategies and actions to meet the District Plan's housing objectives.

The following table provides the Property Council's response to each of the strategies and actions.

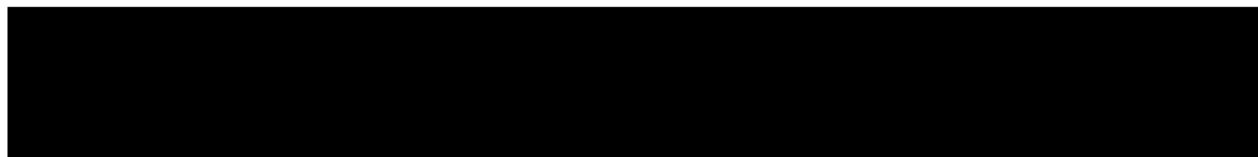


Strategies and Actions	Property Council Response
<p><u>6.3.1 Focus new housing growth in urban release areas</u>  <i>Actions:</i></p> <ul style="list-style-type: none"> <li>• Reviewing the Hawkesbury Growth Centres DCP to require a minimum dwelling mix of dwelling density,</li> <li>• Introducing incentives to encourage multi-unit dwellings near the town centre,</li> <li>• Targeting a proportion of one and two bedroom in multi-unit developments, and</li> <li>• Encouraging innovative housing types such as small lot subdivision, rear lane dual occupancies and secondary dwellings, build to rent schemes.</li> </ul>	<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><u>6.3.2 Maximise the potential of existing urban lands</u>  <i>Actions:</i></p> <ul style="list-style-type: none"> <li>• Investigate rezoning remnant R2 Low Density Residential sites in Windsor and Richmond, as outlined in section 6.3.1,</li> <li>• Advocate for housing on surplus government sites,</li> <li>• Advocate for an increase in the supply of public housing, noting the value of this as an economic stimulus, and</li> <li>• Review planning controls to encourage increased densities in infill development on under-utilised sites.</li> </ul>	<p>The Property Council supports Council taking steps to encourage infill development in existing centres such as Windsor &amp; 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><u>6.3.3 Increase the supply of smaller dwellings</u>  <i>Actions:</i></p> <ul style="list-style-type: none"> <li>• Permit low-rise apartment buildings in selected areas/sites in the R1 zone by allowing for 3-storey development with exceptions for flood management heights and examining the potential FSRs of 0.8:1 to 1:1.</li> <li>• Expand shop-top housing by transitioning centre-based R2 Low Density Residential zones with non-residential uses to a B1 or B2 zone.</li> <li>• In consultation with SES, transition R2 Low Density Residential land directly adjacent to the centres of Richmond and Windsor to R3 Medium Density Residential to enable low-rise medium density complying development,</li> <li>• Expand centre zoning to include neighbouring residual R2 zoned land to promote density and establish stronger boundaries.</li> <li>• Encourage attached dwellings adjacent to centres through mapped additional local provisions.</li> </ul>	<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>





Strategies and Actions	Property Council Response
<p><b>6.3.4 Continue to expand affordable housing options</b></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> <li>• The <i>Affordable Housing Policy</i> could be strengthened by confirming an expectation for: <ul style="list-style-type: none"> <li>(a) In large scale developments, such as release areas, Council anticipates that the developer would contribute to affordable housing, through an in-kind or cash contribution;</li> <li>(b) Initially, affordable housing contributions would be administered via a Voluntary Planning Agreement with the rate of contribution to be determined through feasibility testing, with Council to obtain an independent peer review of the feasibility testing,</li> <li>(c) The rate of contributions would be determined on a case by case basis with reference to development feasibility, but Council could aim to achieve between 5% and 10% of new residential GFA as affordable housing by 2036, consistent with the GSC's <i>Western City District Plan</i>.</li> <li>(d) Council could monitor opportunities to capture zoning uplift for the benefit of affordable housing and if appropriate, develop an Affordable Housing Contributions Scheme consistent with the NSW Government's requirements, which sets out the areas where an affordable housing contribution is to be paid and the rate based on feasibility testing,</li> <li>(e) Require, on large developments, the dedication of affordable rental housing in Council ownership in perpetuity,</li> <li>(f) Continue to support the development of micro-apartments (boarding houses), secondary dwellings, however, carefully consider the location of boarding houses to ensure they are appropriately located near transport and amenities,</li> <li>(g) Investigate and adopt innovative models which achieve more affordable homes through Build-to-Rent schemes, compact layouts, shared facilities and fewer car spaces in accessible locations,</li> <li>(h) Dwellings contributed will be held in perpetuity as Affordable Housing and managed by a community housing provider (CHP),</li> <li>(i) Affordable dwellings are to be made available to households on low and moderate incomes.</li> </ul> </li> <li>• Council could undertake a review of its assets to identify sites that are surplus to requirements and suited to development to meet a specific housing need such as affordable housing.</li> </ul>	<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>Council would be aware that the Western City District Plan has established a 5 to 10% target for affordable rental housing for each LGA although it did not specify how that target would be implemented. DPIE has issued guidelines for the establishment of affordable housing contribution schemes under SEPP 70 where Council propose to initiate such a mechanism. Viability is an important consideration in this process and Council would need to ensure that viability is not impacted should it proceed down this pathway.</p> <p>The NSW Government recently exhibited a EIE for a proposed Housing Diversity SEPP. That new policy will integrate SEPP 70, the ARH SEPP, Seniors Housing SEPP and introduce new categories of housing such as Build-to-Rent, student housing and co-living housing. There may be opportunities for Council to encourage some of these other housing types and it should consider how it responds to them in its local planning controls.</p>



Strategies and Actions	Property Council Response
<p><u>6.3.5 Maintain a long-term supply of residential land</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> <li>• The Vineyard release area presents significant opportunities for housing growth. It will be important to identify future urban release areas at an early stage to allow adequate time for planning and infrastructure delivery &amp; maintain a buffer of zoned and serviced land to allow for market fluctuations.</li> <li>• Council could undertake environmental investigations of sites to determine future development potential, if any. If no urban potential is found, alternative investigation areas will need to be identified.</li> </ul>	<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><u>6.3.6 Develop a program to monitor housing land supply and housing delivery</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> <li>• Establish a database of residential land supply disaggregated into land that is: <ul style="list-style-type: none"> <li>a) Zoned for residential development</li> <li>b) Zoned and serviced for residential development</li> <li>c) Zoned, serviced and subdivided.</li> </ul> </li> <li>• Establish a program to investigate potential new urban areas as indicated in section 6.3.</li> </ul>	<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 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><u>6.3.7 Continue to work with other levels of government, the community, local services and agencies to address homelessness</u></p> <p><i>Actions:</i></p> <ul style="list-style-type: none"> <li>• Consider preparing an updated Homelessness Action Plan which identifies updated needs and actions,</li> <li>• Advocate for the needs of the LGA's homeless people seeking increased funding opportunities and</li> <li>• Investigate the need for additional outreach services targeted to homeless people in the LGA.</li> </ul>	<p>The Property Council welcomes and supports Council tasking steps to address homelessness within the Hawkesbury LGA.</p>

## 2.0 Draft Employment Lands Strategy

### 2.1 General Comments

The Property Council welcomes the opportunity to provide comments to Council on its draft Hawkesbury Employment Lands Strategy (ELS). This is an important piece of evidence to guide Council's decision-making on actions to give effect to the Western City District Plan and Council's Local Strategic Planning Statement (LSPS). We generally support the ELS and its actions.

We note that this strategy has been prepared in accordance with the *Greater Sydney Regional Plan* (Action 11) and the *Western City District Plan* (Action 51) and will contribute towards Council updating its land use plan, *Hawkesbury Local Environmental Plan 2012* to give effect to those strategic plans.

It is understood that Hawkesbury LGA currently has 3.4km<sup>2</sup> of employment land, comprising both business zones (B1, B2, B5 and B6) and industrial zones (IN1 and IN2). These employment lands are mostly located in the southern part of the LGA within the primary centres of Windsor, South Windsor, Richmond, North Richmond, Pitt Town and Mulgrave. There are no employment lands within the rural areas of the LGA.

Although action 53 of the *Western City District Plan* requires Council to "plan and manage" industrial and urban service land, Figure 19 of the Plan indicates the industrial land in Hawkesbury LGA is to be "retained and managed". We welcome consideration of opportunities to increase the amount of industrial and urban services land where appropriate.

Hawkesbury City LGA has a high employment self-containment rate. Data on workers leaving Hawkesbury City LGA for employment elsewhere mostly travel to jobs in Blacktown (3,560 workers), Penrith (2,829 workers) and The Hills (2,332 workers).

There has been a contraction of established industries traditionally associated with industrial precincts, such as manufacturing. This is reflective of a broader trend in the Greater Sydney economy. The ELS indicates this will require a strategic planning response for Hawkesbury that better aligns industrial land use with the skills of resident workers to improve industry retention or attraction.

### 2.2 Strategic Considerations

#### 2.2.1 Employment Floorspace – gap analysis

##### Retail

The ELS has found there is a need for approximately 1,857sqm of retail floor space by 2026, which could increase to 20,237sqm by 2036. The need for additional retail floor space would largely be split between McGraths Hill, Richmond and Windsor.

The Property Council supports the identification of this need and would encourage Council to plan for an appropriate supply of zoned land for the retail uses described in the ELS.

##### Commercial & Industrial

Analysis presented within the ELS has found there is sufficient floorspace capacity under current planning controls to cater for future demand for commercial/retail and industrial precincts out to 2036. Projections included in the ELS indicate that industrial floorspace demand is expected to grow at around 9,082sqm per year and commercial floorspace demand at 3,372sqm per year. This amounts to about 3 years of capacity in the system for industrial floorspace and 19 years for commercial/retail.

The Property Council acknowledges the available opportunities for these land uses and encourages Council to monitor supply and demand of land for these uses and undertake to intervene where actual production of floor space is failing to keep up with demand.

### **2.2.2 Emerging business and industrial trends**

#### Retail and commercial

The ELS has identified:

- online retailing,
- emergence of café culture/food centres/ experience dining,
- fine grain retail spaces, and
- coworking spaces

as economic trends that may affect the employment structure and employment lands of the Hawkesbury LGA in the future.

The Property Council supports actions that are intended to adapt to these trends and changes.

#### Industrial lands

The ELS has identified:

- changes in freight transportation,
- creative uses, and
- agribusiness and sustainability.

as significant issues for industrial precincts.

The Property Council supports actions that are intended to help the Hawkesbury LGA adapt to these emerging and high-growth industrial uses.

#### Tourism

The ELS has identified the visitor economy as a major economic opportunity for the Hawkesbury LGA.

The Property Council supports actions that are intended to support further growth in the region's tourism sector, including accommodation, tourism destinations and related services such as cafes, restaurants and cellar door premises.

#### Innovation Precincts

The ELS has identified innovation precincts as a key driver to business productivity growth which translates into economic growth. It suggests that Clarendon contains the Western Sydney University, a research anchor, which is one of the key elements for an innovation precinct.

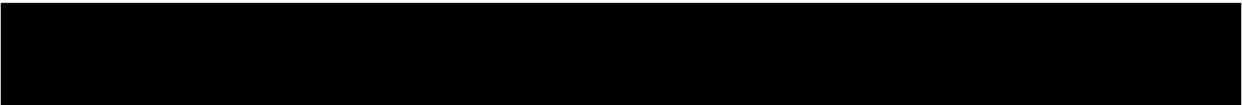
The Property Council supports Council working with the precinct's stakeholders to build collaboration in relation to agribusiness and STEM and also investigating whether an innovation precinct is feasible

## **2.3 Place based planning recommendations and implementation**

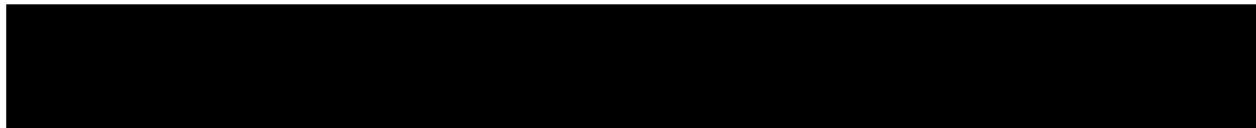
Section 5.4 of the ELS provides 25 recommendations and actions.

The following table provides comments in respect of each of the planning recommendations or actions identified for the locations identified in the ELS.

Planning Recommendations	Response
<p><b>Richmond</b> operates as a provider of essential services to the local population and a key hub of the LGA as part of the Richmond-Windsor Strategic Centre. Richmond should continue to strengthen this role in line with the <i>Western City District Plan</i> directives. The role of Richmond, as the primary provider of essential services, will become even more important as the needs of the local population change and as the population ages.</p>	
<p><i>Recommended Actions:</i>  R1 – Develop a social program that is inclusive of the whole community and visitors to the LGA.  R2 – Plan for a small increase in retail floor space in the medium to long-term.  R3 – Plan for a small addition of commercial floor space (relevant for a local centre) towards 2036.  R4 – Encourage small scale health service provision in the centre.  R5 – Investigate the applicability of an urban, forum space in the centre.  R6 – Improve amenity, safety-by-design and connectivity to and around the rail station.</p>	<p>The Property Council generally supports Council taking action to implement these actions in respect of Richmond. We look forward to Council releasing further information and proposals regarding how it will strengthen the vibrancy and economic role of Richmond.</p>
<p><b>Windsor</b> – As part of the combined Strategic Centre, Windsor will have to overcome some character and amenity issues and will need a coordinated strategy to maintain activity along the expansive George Street stretch from the rail station and high street to the river. There may be potential for Windsor to expand its small-scale commercial and tourism roles.</p>	
<p><i>Recommended Actions:</i>  R7 – Investigate precinct planning to develop the Windsor Station as a ‘gateway’ to the Hawkesbury region.  R8 – Monitor activity between Windsor station and Hawkesbury Valley Way as the ‘gateway’ is developed. Investigate and consider up-zoning the B1 zone around Windsor station to allow for more commercial activity. Consider expansion of the B1 zone to align with some of the current uses in the area. Consider carefully, the timing of land release for B zones, so that it meets demand and generates momentum.  R9 – Investigate and develop character areas.  R10 – Plan for a small addition of retail floor space in the medium to long-term.  R11 - Plan for a small addition of commercial floorspace (relevant to a local centre) towards 2036, dependent on the outcome of R8.  R12 – Support the establishment of a high quality co-working space and the allowance for pop-up businesses in vacancies.  R13 – Build the tourism industry, using Windsor as the primary, first hub.</p>	<p>The Property Council generally supports Council taking action to implement these actions in respect of Windsor. We look forward to Council releasing further information and proposals regarding how it will strengthen the vibrancy and economic role of Windsor. We welcome changes to land use zonings within Windsor to support its economic and employment growth.</p>



Planning Recommendations	Response
<p><b>Clarendon</b> will become a key agri-business and STEM hub within Greater Sydney. There is growing activity and momentum between Clarendon stakeholders to build the agri-business capabilities in the region (the education entities), the STEM capabilities in the region (RAAF), and the career pathway opportunities for students. Council can support growth of these industries and facilities collaboration between stakeholders.</p>	
<p><i>Recommended Actions:</i>  R14 – Support greater collaboration and dialogue between the Clarendon stakeholders and support industry linkages.  R15 – Support the development of the RAAF heritage museum,  R16 – Leverage the activity in the precinct for agri-business, food systems and STEM and link it to tourism opportunities,  R17 – Encourage and synergise land uses in the Clarendon Precinct,</p>	<p>The Property Council welcomes and supports Council implementing these recommendations regarding the Clarendon precinct. We look forward to receiving updates from Council on progress with these recommendations.</p>
<p><b>Mulgrave</b> contributes valuable industrial and urban services land to the Hawkesbury LGA and Greater Sydney. The value of this contribution should be recognised and a ‘retain and manage’ approach applied to these lands. Mulgrave is the preferred industrial precinct in the LGA due to the quality of the built form, transport accessibility and general character. Council should continue to monitor this precinct over time, to assess whether any expansion would be required in the lead up to 2036 and beyond.</p>	
<p>R18 – Monitor the performance of the industrial precinct over time and nominate an area as ‘future industrial’ for the expansion of the industrial precinct.  R19 – Facilitate and monitor the growth of fresh produce processing and align industrial land use capacity as relevant.  R20 – Maintain buffers between industrial and residential/commercial land uses.  R21 – Consider industrial land operational needs alongside employment generation.</p>	<p>The Property Council supports these recommendations to support the economic development of the Mulgrave precinct. Steps should be taken to progress recommendation R18 to provide for future expansion of the precinct. Council is encouraged to speak with industrial landowners and businesses regarding R21.</p>
<p><b>South Windsor</b> can reposition its industrial offering, providing smaller lots to meet the demand of local operators, while smaller changes to the public domain and retailing can generated increased vitality in the neighbourhood centre.</p>	
<p>R22 – Improve retail activation and linkages  R23 – Consider the addition of smaller lots in the industrial precinct and update DCP to support.  R24 – Consider industrial land operational need, not just employment generation.</p>	<p>The Property Council supports these recommendations regarding South Windsor.</p>
<p><b>Smaller Centres</b> – The focus for smaller centres in the LGA will be to ensure floorspace, urban design and amenity meets the needs of the local population and visitors to the LGA.</p>	
<p>R25 – Plan for small additions to retail and commercial floorspace relevant in the smaller centres in the medium to long-term.</p>	<p>The Property Council supports recommendation R25 and encourages Council to take steps to provide for incremental growth of these centres to meet future demand.</p>





**From:** [REDACTED]  
**Sent:** Mon, 12 Oct 2020 15:59:13 +1100  
**To:** Hawkesbury City Council  
**Cc:** Andrew Kearns  
**Subject:** [REDACTED] Submission to draft Hawkesbury Local Housing Strategy (DLHS)  
**Attachments:** [REDACTED] Submission Local Housing Strategy FINAL SUBMISSION.pdf

Dear Andrew,

Please find the enclosed submission responding to the draft Hawkesbury Local Housing Strategy (DLHS) that is due today.

[REDACTED] is ready and willing to work with Council and State Agencies to ensure that Hawkesbury's future housing supply is met and delivered in alignment with the character of the Hawkesbury.

Please do not hesitate to contact me should you require any further information.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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# SUBMISSION TO PUBLIC EXHIBITION OF DRAFT HAWKESBURY LOCAL HOUSING STRATEGY

12 OCTOBER 2020



## EXECUTIVE SUMMARY

Council is to be commended on the significant work it has undertaken to develop the Draft Local Housing Strategy (DLHS). The DLHS identifies that new development in much of the LGA is constrained for development, yet new housing is required to meet the needs of the community.

To ensure that the DLHS can effectively deliver Council's vision of, *'providing a diversity of housing to meet the future needs of the community without compromising safety, environmental quality and local character'*, Celestino have identified that given the constraints to housing delivery in the LGA, only a balanced consideration of new urban investigation areas can deliver on the identified housing needs for the Hawkesbury, and reduce the impacts of development pressure on the character of the LGA.

There is anecdotal evidence that COVID-19 will drive significant demand in the short-medium term for lower density housing, particularly in regional centres and the suburbs where space is available. Greenfield, masterplanned communities are best positioned to absorb this demand at little or no cost to Government. The success of the masterplanned communities such as The Gables and Elara that border the Hawkesbury LGA demonstrates the demand for housing in these regional centres.

██████████ able to offer a 254-hectare future development site at Terrace Road, North Richmond that meets all the requirements of the DLHS. With Celestino's experience with large masterplanned communities combined with the below site characteristics we are well positioned to provide Council with confidence on the future housing delivery targets.

- ✓ Above the 1:100-year flood and PMF as shown in **Appendix A**
- ✓ Development can occur with little, to no impact to onsite biodiversity values
- ✓ Outside impacts of the ANEF
- ✓ Land in single ownership (not fragmented)
- ✓ Services such as wastewater can be delivered independently of the existing Sydney Water system in a similar arrangement to Celestino's site at Glossodia
- ✓ No heritage onsite
- ✓ No disruption to existing urban form
- ✓ Celestino can deliver a balanced outcome of jobs, housing, and amenity through one single VPA
- ✓ A strong, long term relationship with the Hawkesbury Council
- ✓ Development complementary to Glossodia and North Richmond

As the site is one of the few within the LGA that is relatively free of environmental constraints and has the scale to support future housing growth Celestino would like to work with Council to confirm that our site be included as a future investigation area in the final DHLS.

## THE STRATEGIC PLANNING CONTEXT

A Local Housing Strategy is a requirement for all Councils in the Greater Sydney Region and will replace the Hawkesbury Residential Land Strategy when adopted. It is intended to inform the Hawkesbury Local Environmental Plan which will be reviewed soon.

### The Greater Sydney Region Plan – A Metropolis of Three Cities

The Hawkesbury Local Housing Strategy is required to be consistent with the Greater Sydney Region Plan (Region Plan). The Region Plan sets out a vision to rebalance growth more equally and equitably to residents across Greater Sydney. The Region Plan was prepared concurrently with Future Transport 2056 and the State Infrastructure Strategy, aligning land use, transport, and infrastructure planning to reshape Greater Sydney as three unique but connected cities. Hawkesbury is within the Western Parkland City and the Region Plan identifies much of Hawkesbury as Metropolitan Rural Area.

The Region Plan sets broad objectives for Greater Sydney (Objectives 10 and 11) including:

- Creating capacity for more housing in the right locations
- Supporting planning and delivery of growth areas and planned precincts
- Supporting investigation of opportunities for alignment with investment in regional and district infrastructure
- Supporting the role of centres
- Supporting the delivery of a diversity of housing
- Ensuring that housing range and supply are better suited/matched to population over time

Historically, there have been multiple strategic planning documents that support urban development within the North West Growth Areas. Land in the Hawkesbury LGA was identified in State Regional Environmental Plan No.19 (SREP19) – Rouse Hill Development Area. Specifically, SREP19 identifies areas capable of urban development within the Hawkesbury LGA. Refer to Figure 1 below.

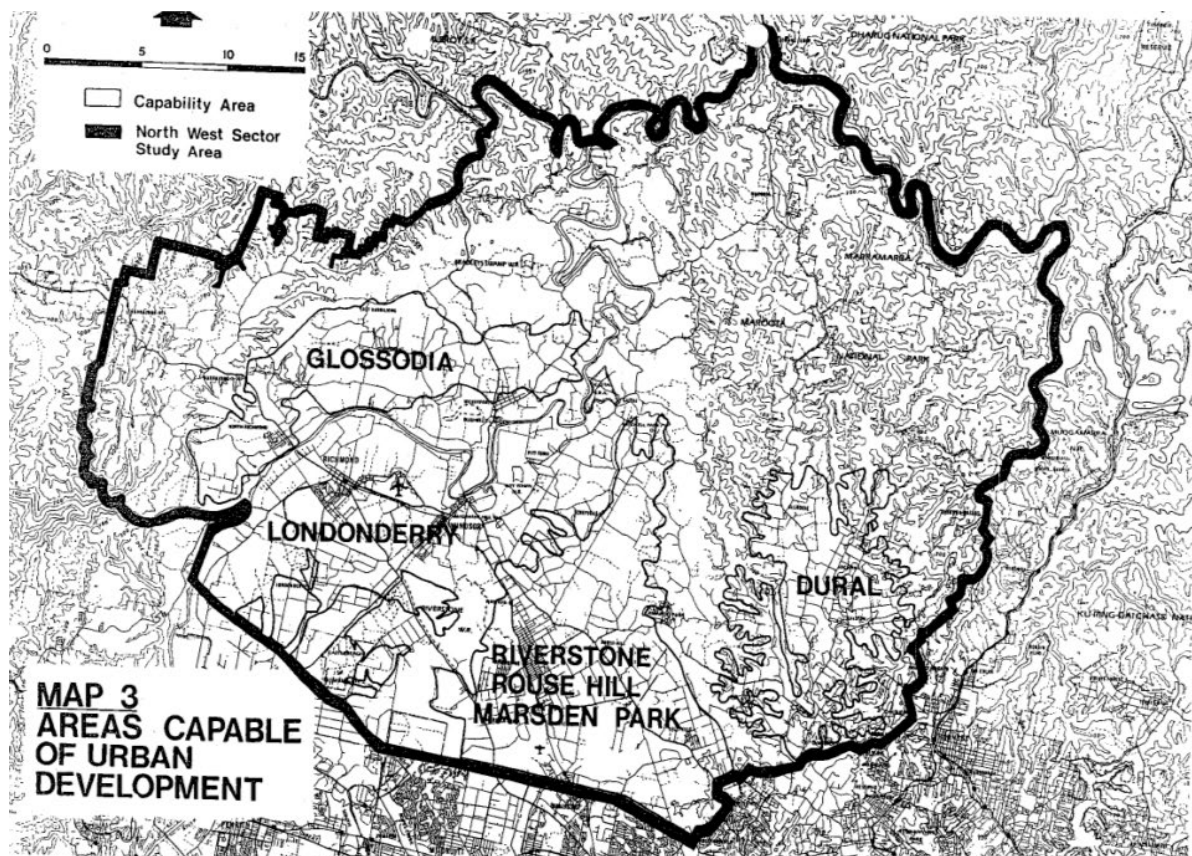


Figure 1 – SREP19 – Areas Capable of Urban Development

### **Western City District Plan**

The Hawkesbury Local Housing Strategy is required to be consistent with the Western City District Plan (District Plan). The District Plan guides the implementation of the Region Plan. The District Plan sets out a vision, priorities, and actions for the development of the Western Parkland City. It identifies Hawkesbury as having capacity for additional housing supply into the medium and longer term. The broader Hawkesbury LGA has a 0–5-year housing supply target from 2016–2021 of 1,150 homes.

Planning Priority W5 of the District Plan seeks to provide housing supply, choice, and affordability, with access to jobs, services, and public transport. Specifically, it provides that:

*“new housing must be in the right places to meet demand for different housing types, tenure, price points, preferred locations and design. Housing supply must be coordinated with local infrastructure to create liveable, walkable and cycle-friendly neighbourhoods with direct, safe and universally designed pedestrian and cycling connections to shops, services and public transport.”*

## **A VISION FOR HOUSING DELIVERY**

### **Hawkesbury Local Housing Strategy**

The Hawkesbury Local Housing Strategy is required to:

- Facilitate the 0-5 year and 6-10 year housing targets within the District Plan
- Identify capacity to contribute to 20-year housing targets
- Align growth with infrastructure
- Identify locations for growth (and locations unsuitable for growth).

### **Housing Vision**

The DLHS' Vision is clear in the intention for housing delivery within the LGA:

*Hawkesbury LGA will provide a diversity of housing to meet the future needs of the community without compromising safety, environmental quality, and local character.*

### **DLHS Recommendations**

The DLHS identifies eight key recommendations:

- Focus housing growth including encouraging housing diversity in urban release areas
- Maximise the potential of existing urban lands
- Increase the supply of smaller dwellings
- Expand affordable housing options
- Investigate potential new urban areas
- A program to monitor land supply and housing delivery
- Address homelessness
- Consider detached dual occupancies and secondary dwellings

### **Housing Targets**

The DLHS identifies targets of 1,150 dwellings between 2016 – 2021 and 4,000 dwellings from 2016-2036 (200 per year). The original Department of Planning, Industry and Environment projections of 8,000 dwellings between 2016 – 2036 (400 dwellings/year) have been halved. The DLHS needs to recognise that the housing market is not contained to the LGA and there will be external pressures from the broader Sydney that will influence local demand. COVID-19 impacts to the property market are now being understood in more detail. Buyers are moving away from high density living (apartments) and moving to regional centres and the suburbs where space is desired. Demand for housing within the outer Sydney LGA's has increased and will continue to rise significantly in the short to medium term. This shift will drastically change the forecast, and hence it would be prudent to identify other mid to long term housing supply options in all LGA's.

### **The Hawkesbury Experience**

The LGA had average annual approvals of 185 dwellings per year in the decade from 2008/09 – 2017/18 with average dwelling completions since 2012/13 of 169 dwellings per year. The LGA is tracking below target which we believe is due to a misalignment between consumer demands which the market will deliver (greenfield housing) and the capacity of the existing zoned land (infill and medium density housing).

Whilst dwelling completions are steadily increasing, historical trends suggest the LGA will deliver 2,600 – 3,700 dwellings, which without intervention will fail to meet even the revised housing target (4,000 dwellings from 2016-2036). This further reinforces the need for the DLHS to provide a clear pathway on how the LGA can accommodate housing beyond the current housing target.

## CONSTRAINTS TO NEW HOUSING

The LGA has considerable natural assets being situated on the banks of the Hawkesbury River at the interface of metropolitan Sydney and the significant conservation lands along the Great Dividing Range.

The natural and cultural landscapes present both an asset and constraint to development and when combined with current and planned infrastructure render substantial parts of the LGA as inappropriate for urban development. Constraints to urban development in the LGA include:

- Biodiversity Value
- Flooding
- Heritage
- Services and Sewer Capacity
- ANEF Noise Contours
- Traffic and Transport

## EXISTING AND PLANNED HOUSING CAPACITY

The current capacity of the LGA to meet the housing targets is not without barriers. These should be reflected in the final Strategy as they have significant implications for any future LEP amendments and Council's aspirations to accommodate and deliver much needed affordable housing.

### Greenfield Housing Capacity

The Greenfield release areas identified in the DLHS are intended to contribute most of the new housing in the LGA:

- Vineyard Stage 1 (2,500 dwelling capacity) has been rezoned and approvals are expected once Council's Contribution Plan has been adopted. Stage 2 however is constrained until a decision has been made regarding the future alignment of the M12 Outer Sydney Orbital. Servicing capacity is also a concern for Stage 2.
- Redbank (1,400 dwelling capacity) is the only significant greenfield development within the LGA that is currently delivering housing
- Jacaranda (580 dwelling capacity) – Celestino are collaborating with Council which is expected to be rezoned in 2021. Approvals will follow the rezoning with the first housing delivery expected in 2022.
- The Kurmond/Kurrajong urban investigation area (54 dwelling capacity) is a collection of individual planning proposals that are not governed by a holistic planning strategy. The realisation of this capacity will require significant resource investment by Council to progress and presents an insignificant contribution to housing supply overall.
- Vineyard North, like Vineyard Stage 2, is constrained by the future alignment of the M12 Outer Sydney Orbital.

### Centres Housing Capacity

The LGA's five centres offer very limited opportunities for new housing:

- Windsor (113 – 148 dwelling capacity) is significantly constrained by heritage, aircraft noise and flooding.
- South Windsor (804 - 1,609 dwelling capacity) is also significantly constrained by aircraft noise and flooding, and to a lesser extent, heritage.
- Richmond (558 – 723 dwelling capacity) is significantly constrained by heritage, land fragmentation, flooding, and to a lesser extent, aircraft noise.
- North Richmond (683 – 731 dwelling capacity) is significantly constrained by bushfire affectation (excluding Redbank) and flooding, and to a lesser extent, access to transport infrastructure. Flood evacuation is a particular concern given the centre is north of the Hawkesbury River.
- Hobartville (1,320 dwelling capacity) is ideally located within proximity to transport, open space, and education (including university), and is relatively free from significant constraints (except for PMF flooding). The centre is already zoned for medium density development however land fragmentation and the age of the existing housing stock are identified as the key barriers to housing delivery.

## DELIVERING HAWKESBURY'S HOUSING NEEDS

Planning for development will be critical to meeting the housing needs of the community into the future.

### Housing Structure

The DLHS details the opportunities for the planning framework and the market to deliver on the LGA's housing needs:

- Deliver small and mid-range developments suited to young professionals with young families and over 55's looking to downsize near activated villages.
- The LGA housing stock is currently 85% detached dwellings. Provide greater housing diversity and enable housing choice that is more suited to the individual circumstances of every member of the community.
- Deliver a significant supply of family housing in different price brackets.
- Deliver secondary dwellings which present a smaller and more affordable option for young families to establish and downsizers to age in the community.
- Provide one- and two-bedroom dwellings with good access to services and transport to meet the needs of sole person households, young families, and seniors.
- Produce accessible dwellings which are critical to creating a more equitable housing market.
- Alleviate housing stress by providing affordable housing

### Delivering Housing

The DLHS canvasses other opportunities to deliver housing in the LGA (for example R2 lands, Hobartville, South Windsor) but these are all impacted by variations of aircraft noise affectation, heritage, and character constraints.

## A PLAN FOR BALANCED GROWTH

### A New Urban Investigation Area

It is Celestino's view, that a balanced consideration of new urban investigation areas, can deliver on the identified housing needs for the Hawkesbury, and reduce the impacts of development pressure on the character of the LGA.

Celestino have recently acquired a 264-hectare land holding at Terrace Road, North Richmond. In response to the DLHS we have recently commenced investigation of the potential of this land to contribute to delivering the DLHS' housing vision and supply. With COVID-19 impacts to the property market now being understood, buyers are moving to regional centres and the suburbs where space is desired. Demand for housing within the outer Sydney LGA's has increased and will continue to rise significantly in the short to medium term. This shift will drastically change the forecast, and hence it would be prudent to identify other mid to long term housing supply options in all LGA's. Greenfield, masterplanned communities are best positioned to deliver housing options at little or no cost to Government.

Currently the DLHS canvasses only a preliminary appreciation of the long-term housing prospects for the LGA. Our development vision for Terrance Road, North Richmond is aligned to the DLHS vision and the LGA's housing needs and we implore Council to take the next step and identify the site as a new urban land releases area.

### An Opportunity Free from Environmental Constraints

Initial investigations indicate that the Terrace Road, North Richmond site is ultimately unconstrained by environmental constraints. The 254ha site is:

- ✓ not impacted by flood inundation under the 1:100 or PMF scenarios as shown in **Appendix A**. Development of the site could fund additional road infrastructure works to improve flood evacuation across the Hawkesbury River
- ✓ not impacted by the RAAF base ANEF Noise Contours
- ✓ largely modified pasture that is currently used for cattle grazing
- ✓ not identified as of European heritage value
- ✓ not identified as having significant Aboriginal heritage value
- ✓ gentle in site topography reducing future site building costs
- ✓ partially impacted by bushfire affectation which can effectively be managed through the creation of Asset Protection zones within the site
- ✓ suitable for residential, education, business, and other uses.

### **An Opportunity Constrained only by Strategic Planning**

The Terrace Road, North Richmond site is situated wholly within the MRZ. This designation presents the most significant constraint to the creation of a new masterplanned community at the site.

The MRZ designation is based on the Greater Sydney Commission's view that there is sufficient zoned and planned urban release land to meet the housing demands of Greater Sydney. The Hawkesbury's housing needs are distinctly different, and they are not being met by the availability of land for greenfield development within the LGA.

The DLHS examines the LGA's housing needs over two decades. Given the expected lifetime of the Strategy it is appropriate for Council to build on the existing work within the DLHS to commence planning to meet future unmet housing need now to garner community support and provide signals to the market as to the next round of urban investigation areas. We also consider that now is the right time to make representations to the NSW Government as to the impacts of the MRZ for Council to meet the future housing needs of the LGA.

## **DELIVERING THE VISION OF THE DRAFT LOCAL HOUSING STRATEGY**

The Terrace Road, North Richmond site presents an opportunity to meet local housing needs and achieve the housing targets for the LGA whilst protecting the existing centres from inappropriate and unviable development pressure.

The development of the North Richmond site as a new masterplanned community can provide *a diversity of affordable housing to meet the future needs of the community without compromising safety, environmental quality, and local character.*

### **An Integrated and Masterplanned New Community**

The North Richmond site can be fully self-sufficient. With a new village centre, the provision of significant amenity, all within walking distance, the site can meet the future needs of the community and deliver on the LGA's housing targets.

### **An Investment in Infrastructure**

Our initial concept plan for the North Richmond site could include:

- ✓ diverse housing options to meet the needs of the Hawkesbury community
- ✓ a new Agribusiness Enterprise Precinct to drive the local economy and enrich the local community
- ✓ a new agricultural school consistent with the agricultural values and relevant to the community
- ✓ a new village centre and open space within walking distance to service the new community
- ✓ new sporting and recreational facilities
- ✓ funding for road upgrades and more bridge capacity over the Hawkesbury River providing wider community benefits of greater evacuation and climate resilience
- ✓ a private wastewater treatment solution and embedded energy network
- ✓ a masterplan sensitive to existing vegetation on site
- ✓ rehabilitation of the existing watercourses, greening streets which all contribute to aspirations of a green grid and reduced urban heat island

### **Housing Diversity that Meets the Needs of the Hawkesbury Community**

A new masterplanned community, planned from the start as a collaboration between Council and Celestino, is the greatest opportunity to improve housing diversity in the LGA.

The North Richmond site could also include a retirement living development adjacent to the new village centre. The village centre could also cater for small lot housing that meets the identified demand for one- and two-bedroom housing product.

### **Affordable Housing that Meets the Needs of the Hawkesbury Community**

New land sales in Kurmond are priced at over \$800K for 2,000m<sup>2</sup> lots. Despite the significantly smaller product offering at Vineyard the price points will be equally as unaffordable – lots at Box Hill start at \$500,000 for a 330m<sup>2</sup> lot. North Richmond presents an opportunity to plan for affordability from the outset and deliver a product at a price point the existing and future community needs.

### **Industry for the Future**

The initial concept provides for an Agricultural Enterprise Precinct. Our thinking, much like the planning for our Sydney Science Park in collaboration with CSIRO and Penrith City Council, is that the North Richmond site could demonstrate the future of agriculture and be a catalyst for an agrarian technological revolution in the LGA.



Modernising the LGA's agricultural land use practices and businesses will intensify employment generation in the agriculture sector. The creation of new jobs in this sector is consistent with the Greater Sydney Commission's vision for the Hawkesbury community to capitalise on the delivery of the new Western Sydney Airport and associated access infrastructure that will put global markets within reach of the LGA's fresh food farmers for the first time.

It is our vision that an Agricultural Enterprise Precinct could be on part of our site and it would act as a catalyst for neighbouring sites which would then be transformed for higher value agricultural uses to drive the local economy and enrich the local community, consistent with the aspirations of the Draft Employment Lands Strategy.

### **Supporting Communities**

The expectations of the community that development within centres should be compatible with the current character means that significant densification is likely to be associated with substantial impacts and community opposition. A new centre at North Richmond can mean that the existing centres can continue to incrementally change as they have done for over a century.

### **Promoting Healthy, Liveable Urban Environments**

A new masterplanned community presents an opportunity to develop housing with modern needs at the forefront. Much the same as Jacaranda it is a chance to develop truly liveable urban environments. The North Richmond site can be a truly walkable new community with a distinct urban heart as a focus for residents.

### **A Proven Development Partner with a History of Delivery**

We have delivered The Gables, within The Hills Shire, right on the boundary of the LGA. We have a proven track record of delivering best practice masterplanned communities and the financial resources to deliver the LGA's housing needs with certainty of delivery.

## **RECOMMENDATIONS AND NEXT STEPS**

Council is to be commended on the significant work it has undertaken to develop the DLHS. There are many factors to consider to effectively plan and deliver housing which satisfies the needs and demands of a growing community and respond to the ever-changing dynamics of the housing market. As outlined above, we appreciate the complex market factors that need to be considered in the preparation of a robust and implementable housing Strategy. This ensures that the Strategy can effectively deliver Council's vision of, *'providing a diversity of housing to meet the future needs of the community without compromising safety, environmental quality and local character'*.

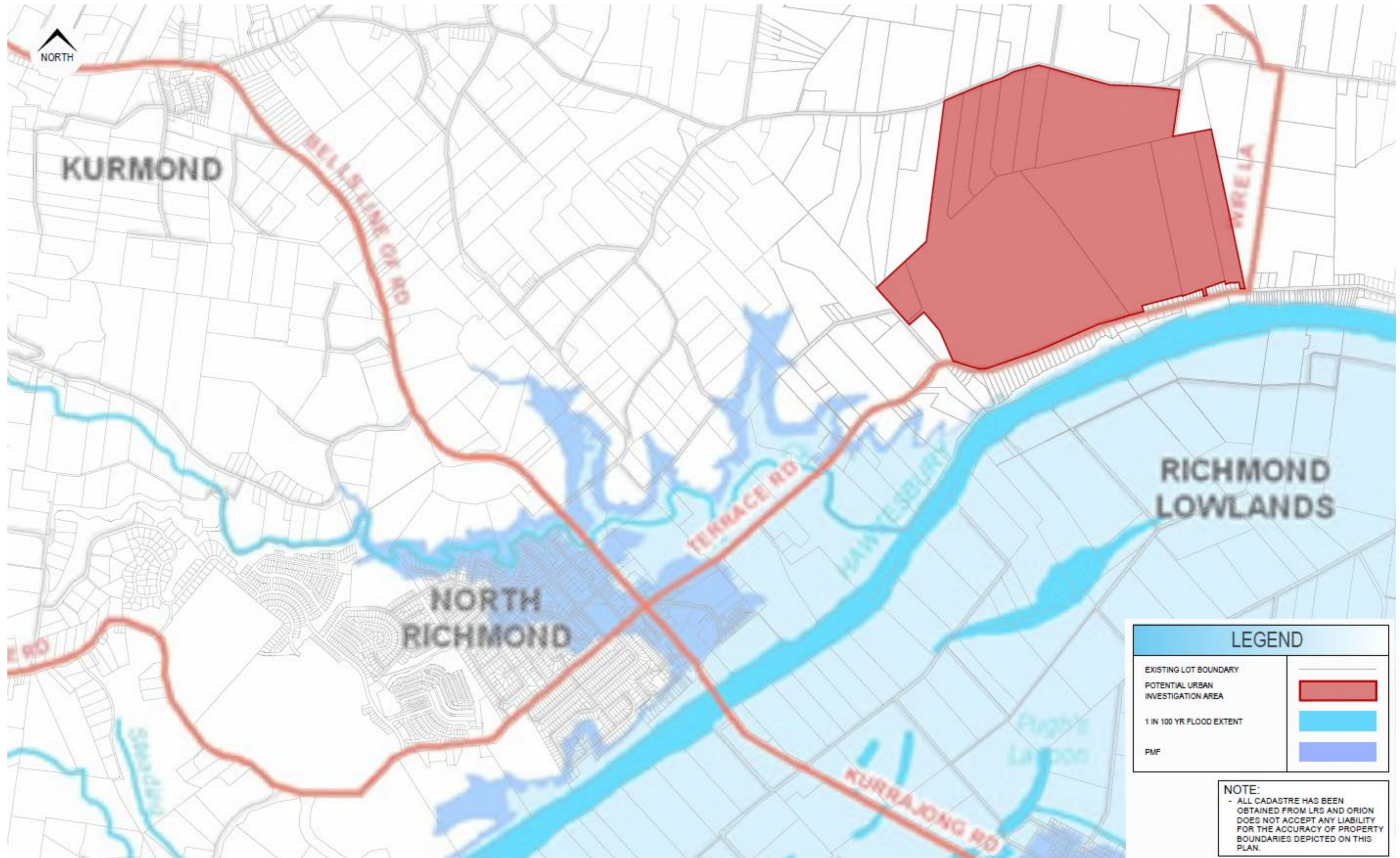
Celestino makes the following specific recommendations to assist the finalisation of the DLHS and to help achieve its vision for the local area:

1. Update the DLHS to provide recommendations on future investigation areas and/or suitable land for development in the long term. **Appendix A** has indicative boundaries of the site.
2. Update the DLHS demand forecasts with current market changes due to increased demand due to the impact of COVID-19 on housing choice
3. Update the DLHS to promote development in areas that are not heavily constrained by flooding, ecological and ANEF issues.

As the Terrace Road, North Richmond site is one of the few within the LGA that is relatively free of environmental constraints and has the scale to support future housing growth we would like to work with Council to confirm that our site be included as a future investigation area in the final Strategy.

We trust that this submission is beneficial to Council in your consideration of the strategic planning for the Hawkesbury LGA. We would welcome the opportunity to discuss this opportunity further with Council and would appreciate being kept informed of the status of the DLHS.

APPENDIX A – TERRACE NORTH RICHMOND URBAN RELEASE INVESTIGATION OPPORTUNITY



LEGEND	
EXISTING LOT BOUNDARY	
POTENTIAL URBAN INVESTIGATION AREA	
1 IN 100 YR FLOOD EXTENT	
PMF	

**NOTE:**  
- ALL CADASTRE HAS BEEN OBTAINED FROM LRS AND ORION DOES NOT ACCEPT ANY LIABILITY FOR THE ACCURACY OF PROPERTY BOUNDARIES DEPICTED ON THIS PLAN.

ISSUED FOR **INFORMATION**

**From:** [REDACTED]  
**Sent:** Mon, 19 Oct 2020 14:13:46 +1100  
**To:** Andrew Kearns; Hawkesbury City Council  
**Cc:** Nicole Miller; [REDACTED]  
**Subject:** Submission to draft Housing Strategy  
**Attachments:** Submission to the Hawkesbury Local Housing Strategy v2.pdf

Hi Andrew,

Please see attached submission to the draft Hawkesbury Housing Strategy on behalf of landowners at Wilberforce.

Please let me know if you have any questions/ comments

Thanks,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Our highest priority is the health and wellbeing of our people, clients and [response to COVID-19.](#) [REDACTED]

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[REDACTED]

Cc: Nicole Miller [REDACTED]

Subject: RE: Submission to draft Housing Strategy

[REDACTED]

I am fine with the submission being lodged on Monday 19 October.

**Andrew Kearns** | Manager Strategic Planning | Hawkesbury City Council

**P** (02) 4560 4604 | **F** (02) 4587 7740 | **E** [andrew.kearns@hawkesbury.nsw.gov.au](mailto:andrew.kearns@hawkesbury.nsw.gov.au)

**W** [www.hawkesbury.nsw.gov.au](http://www.hawkesbury.nsw.gov.au)

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**From:** Georgia McKenzie [REDACTED]

**Sent:** Tuesday, 6 October 2020 9:29 AM

**To:** Andrew Kearns

**Cc:** Nicole Miller; [REDACTED]

**Subject:** Submission to draft Housing Strategy

Hi Andrew,

[REDACTED] are preparing a submission to the draft Housing Strategy on behalf of [REDACTED]. We are meeting with the [REDACTED] on Friday to discuss their position on metropolitan rural areas. We are aware that submissions close on Monday 12<sup>th</sup>.

Would you consider giving us an extension to incorporate [REDACTED] comments into our submission? Ideally we would like an extra week (until Mon 19<sup>th</sup> Oct) but a few extra days would be very beneficial.

Appreciate your help with this.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]


[REDACTED]

[REDACTED] of our people, clients and [REDACTED]

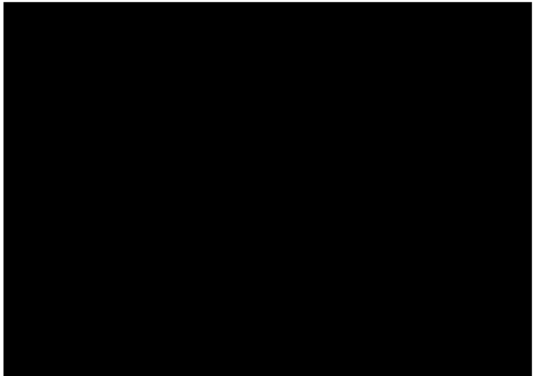
[REDACTED]

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19 October 2020





The General Manager  
Hawkesbury City Council  
366 George Street  
Windsor NSW 2756

Attention: Mr Andrew Kearns

Dear Mr Kearns,

## **SUBMISSION TO THE PUBLIC EXHIBITION OF THE DRAFT HAWKESBURY LOCAL HOUSING STRATEGY**

This submission is prepared on behalf of 

 The landowners strategically adjoin the Wilberforce town centre and welcome the opportunity to comment on the draft Hawkesbury Local Housing Strategy ('draft Strategy'). The draft Strategy will inform future reviews of Hawkesbury's local planning instruments and will also guide future planning decisions in the area.


The site is identified in the Hawkesbury Council's medium to long term urban investigation area in their Residential Lands Strategy. The draft Strategy removes Wilberforce as an investigation for reasons that have little no merit. We respectfully request Council include Wilberforce as investigation area in the draft Strategy with a view to ultimately changing the planning controls in the future LEP review process to reduce the minimum lot size from 10 hectares to 4,000sqm.

The site is able to manage sewer connection with on-site detention, further studies are required to determine if the site will be isolated during a major flood event and the 'Metropolitan Rural Area' objective of the Sydney Region Plan does not preclude higher density residential. Importantly, the site as an investigation is an opportunity for Council to diversify housing opportunities in the Wilberforce are broader Hawksbury LGA.

This submission includes a description of the site and its context, an overview of the draft Strategy, our comments on the draft Strategy and recommendations to Council.

### **1. THE SITE AND CONTEXT**

This submission is on behalf 

 The site is highlighted in red below. The site is a large parcel of land with a combined area of approximately 47 hectares. The site is predominately zoned RU2, with a small portion of the site zoned SP2 to the north. The site gently slopes to the south.

The site immediately adjoins Wilberforce town centre and has development potential given its adjacency to R2 zoned land. The Wilberforce town centre features small residential lots and has amenity such as the Wilberforce shopping centre, Wilberforce Public School and open space.



Figure 1 – The Site



## 2. DRAFT HOUSING STRATEGY

The draft Strategy outlines how housing growth can be managed, by identifying locations suitable for additional housing supply in Hawkesbury LGA. The draft Strategy will inform forthcoming updates to the Hawkesbury Local Environmental Plan, due to be put on exhibition by mid-2021.

Wilberforce was identified in the Hawkesbury Council's medium to long term urban investigation area in the Residential Lands Strategy 2011. The draft Strategy provides an update on the 2011 investigation areas and the Wilberforce area is identified as not required to meet housing provisions. This is a missed opportunity to diversify the housing opportunities in the LGA.

The draft Strategy suggests that the Wilberforce investigation area lacks sewer connections, may be isolated during a major flood event and the 'Metropolitan Rural Area' objective of the Sydney Region Plan may object to any further rezoning to Residential zones. A response to Council's comments is outlined below.

### 2.1 LACK OF SEWER CONNECTION

The draft Strategy finds that land in the Wilberforce investigation area does not have access to sewer connection. The proposed 4,000sqm lot size would have onsite detention tanks and reticulated water infrastructure. This would mean that sewer is managed on site and Council's reason for excluding the area for investigation is no longer valid.

### 2.2 ISOLATION DURING MAJOR FLOOD EVENT

The draft Strategy explores the flooding constraints in the Hawkesbury. Flood planning levels have been adopted based on modelling undertaken in the Hawkesbury Floodplain Risk Management Study and Plan, adopted by Council in 2012. The flood planning shows the site is unaffected during a 1 in 100 flood event.



The landholders recommend that Hawkesbury Council undertake further flood studies and evacuation modelling before eliminating Wilberforce as an investigation area given the draft Strategy relies on old modelling.

In May 2020, the new Windsor Bridge was opened to traffic. The deck of the new bridge is three metres higher at the northern bank and six metres higher at the southern bank to help reduce flooding impacts. The flood immunity of the new bridge is a one in three-year flood level, whereas the existing bridge was one in two years.

The Jacaranda Ponds, Glossodia was recently rezoned and will include 580 lots ranging in size from 1,000 sqm. to over 4,000 sqm. The Jacaranda Ponds development is 4km from the Wilberforce site and located on the same side of the Hawkesbury River. Access to the Jacaranda Ponds development is via the new Windsor Bridge.

The Jacaranda Ponds rezoning included flood evacuation plans providing appropriate design guidance and evacuation management to ensure flood related damage is reduced. Future development at the Wilberforce site would utilise a flood evacuation strategy to minimise impacts during a major flood event. Further, during a flood event, access to Wilberforce is possible via the Great Western Highway.

This means that flood evacuation can be managed and Council's reason for excluding the area for investigation is no longer valid.

## **2.3 METROPOLITAN RURAL AREA OBJECTIVE**

The project team met with representatives of the Greater Sydney Commission on 8 October 2020. The purpose of the meeting was to discuss implications of the metropolitan rural areas (MRA) on residential rezoning on the site. The key take out from GSC is that rural residential development may be considered where there are strong benefits for the rural town.

The site's intention for 4,000 sqm lot sizes is considered suitable and appropriate because dwelling houses are permitted with consent in the RU2 Rural Landscape zone. The potential large rural residential lots will not detract from the existing rural character. The rural streetscape and vegetation will be retained. The proposal will increase housing diversity on land adjacent to Wilberforce town centre.

## **2.4 HOUSING DIVERSITY IN THE HAWKESBURY**

This proposed reduction in minimum lot size at the site is consistent with the draft Strategy recommendation of increasing housing diversity in the Hawkesbury. The draft Strategy suggests that increased housing diversity would encourage individuals aged over 55s year to move into the area, potentially activating areas during the daytime and increasing spending in local businesses. The proposed residential rural 'lifestyle' lots will suit over 55s who are downsizing and younger families who require additional space. These lifestyle lots will cater to a broader demographic and support housing diversity in the Hawkesbury.

The draft Strategy notes that due to the significant environmental constraints in the established urban areas, the greatest opportunity to provide increased housing diversity exists within the greenfield developments. Targeting a mix of dwelling types and sizes, with a particular emphasis on smaller dwellings near new centres or with access to public transport, would significantly improve housing options in the LGA. The proposed reduction in minimum lot size at the site is consistent with these recommendations.





### **3. RECOMMENDATION TO COUNCIL**

Following review of the draft Strategy, we recommend Council:


- Include the Wilberforce site as an urban investigation area, as per the Residential Lands Strategy 2011.
- Undertake further flood studies and evacuation plans to understand the flood impacts to Wilberforce.
- Consider the merits of smaller lot sizes at the Wilberforce site in the development of the new Hawkesbury LEP. This will further support the Wilberforce town centre and housing diversity in the Hawkesbury.

### **4. CONCLUSION**

We thank Hawkesbury City Council for the opportunity to comment on the draft Strategy. This submission has highlighted that the Wilberforce site has clear strategic merit in terms of its ability to deliver large rural- residential lots to further support the Wilberforce town centre and housing diversity in the Hawkesbury. It also has site-specific merit as sewer and flooding will be able to be managed. Future development on the site will be able to maintain the rural landscape because the lots will still be large enough to preserve vegetation and the character of the area.

The landholders look forward to continuing its dialogue with Hawkesbury City Council and to contribute to the finalisation and implementation of the Hawkesbury Local Environmental Plan.

We would welcome the opportunity to meet with Council Officers to discuss the content of this submission.

If you have any questions please don't hesitate to contact me on 

Kind regards,



**From:** [REDACTED]  
**Sent:** Mon, 12 Oct 2020 17:13:50 +1100  
**To:** Hawkesbury City Council  
**Subject:** Exhibition of Draft Hawkesbury Local Housing Strategy  
**Attachments:** Hawkesbury Local Housing Strategy - FINAL.pdf

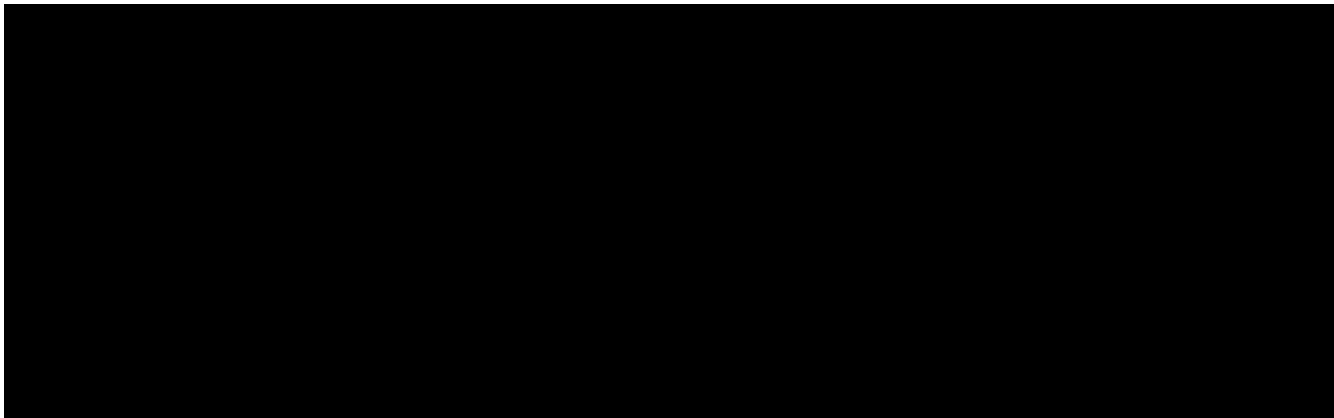
Good afternoon

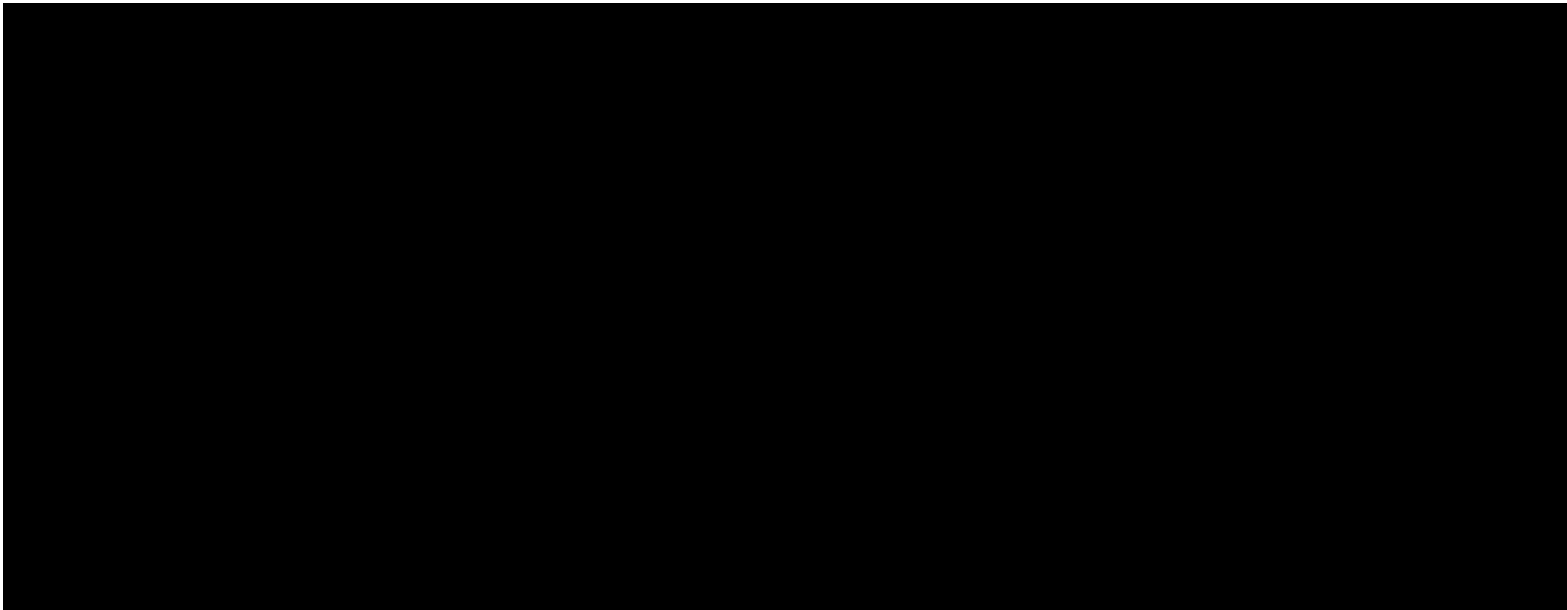
PI find attached [REDACTED] on the draft Hawkesbury Local Housing Strategy.

Evolve Housing would like to commend the Hawkesbury City Council for preparing their Local Housing Strategy such that their priorities and actions are aligned with the *NSW Government Guidelines for Local Housing Strategies* and *Hawkesbury's Local Strategic Planning Statement (LSPS)*. Evolve Housing also commends on Council's best effort to provide a robust evidence base to inform local policy options for meeting affordable housing needs for diverse groups in the community.

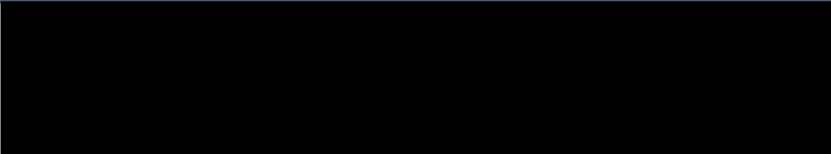
PI contact me if you need any clarifications on our submission.

regards









Submission on  
Hawkesbury -  
Local Housing Strategy  
August 2020

## Submission – Hawkesbury Draft Local Housing Strategy – August 2020

Thank you for the opportunity to comment on the recently exhibited Hawkesbury Local Housing Strategy 2020 (LHS). Evolve Housing would like to commend the Hawkesbury City Council for preparing their Local Housing Strategy such that their priorities and actions are aligned with the *NSW Government Guidelines for Local Housing Strategies* and *Hawkesbury's Local Strategic Planning Statement (LSPS)*. [REDACTED] also commends on Council's best effort to provide a robust evidence base to inform local policy options for meeting affordable housing needs for diverse groups in the community.

[REDACTED] welcomes Council's Housing Vision to adopt a **diversity of housing** to meet the future needs of the community without compromising safety, environment quality and local character. We also commend on Council's consideration of *Greater Sydney Region Plan - Objective 11* (p.23) of making Housing more diverse and affordable in Hawkesbury LGA.

Evolve Housing Particularly welcomes Council's Planning Principal 7 (section 6.2, p.153) – "*Encourage the provision of more affordable rental housing to support the 30% of the community currently experiencing rental stress*". Moving forward in the same direction, Evolve Housing encourage Council to prepare an Affordable Housing Policy/Strategy and collaborate with Community Housing Providers in order to explore alternative affordable housing solutions and increase the supply of social and affordable housing in the community.

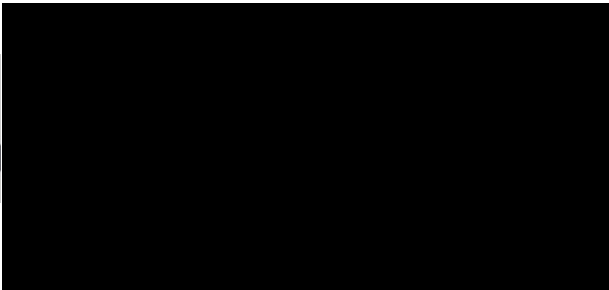
### About this submission

This submission is made by [REDACTED] in response to the Local Housing Strategy 2020 drafted by the Hawkesbury Council. The submission focusses on the economic and social values of affordable rental housing to local communities; the need for affordable rental housing in key areas under Hawkesbury Council; and the opportunities that the Council has, to support the delivery of affordable rental housing in their community over the next 20 years.

### About Evolve Housing

[REDACTED] is one of the largest not-for-profit Community Housing Providers (CHP) in Australia, based in Western Sydney, but providing housing throughout Metropolitan Sydney, Central Coast and the Hunter Region. We have a portfolio of over 3900 properties in NSW, housing some 8,000 residents. The portfolio includes approximately 2600 social housing properties and more than 1300 affordable housing properties. As a Tier-1 registered CHP we have a long history of providing quality social and affordable housing (SAH) and linking our residents to the support services they need. Evolve Housing believes that all levels of government and the not for profit and private sectors have an important role to play in delivering affordable rental housing including the leadership role local Councils play through their Local Housing Strategies.

As an established provider of community housing for over 25 years, we are experienced tenancy and property managers who ensure housing is genuinely targeting the low to moderate income households and key workers. [REDACTED] is also a registered Specialist Disability Accommodation(SDA) provider, providing transitional housing support services for homeless youth through our Evolve



Housing for Youth Division (EHY). Through three-way partnerships, we deliver support housing between [REDACTED], many of our support providers and the clients of our support providers. We have also recently established Safe Foundations, a housing model to provide medium term housing, to supporting women and children fleeing domestic and family violence, exiting from crisis housing.

A wonderful achievement is Evolve's for purpose real estate agency, Echo-Realty. We specialise in property management of our affordable housing which consisting, mostly of National Rental Affordability Scheme (NRAS) properties, dwellings delivered under the Affordable Housing Rental SEPP and housing managed on behalf of two Council's (Parramatta and Willoughby), Sydney Olympic Park Authority as well as some private market properties. Unlike traditional real estate agencies whose sole objective is to generate profit, EchoRealty is a profit-for-purpose real estate agency where all profits are reinvested to grow the supply of affordable and social housing and to fund social inclusion programs.

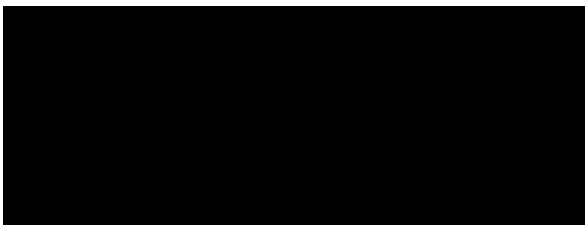

[REDACTED] owns and manages housing across 38 Metropolitan LGAs in Sydney. We manage over 3,000 properties in western Sydney including 11 social housing dwellings in the Hawkesbury LGA out of which one of which is a group home consisting of 6 bedrooms.

We would be keen to assist Council in delivering additional affordable housing through innovative models as further described in this paper. Evolve Housing has developed a wide range of housing and manages a range of household types with renters of various ages. Examples of the housing we have developed or managed by us include:


- An integrated development at Thornton, Penrith, NSW 'Harts Landing' that provides a mixed community consisting of private, affordable and social housing. The Harts Landing project is an example of how governments, a private developer and community housing providers can collaborate to deliver a high quality, seamlessly integrated community for all. It has provided:
  - 124 affordable apartments
  - 14 social apartments
  - 130 private market apartments


Importantly, all buildings and apartments are designed and built to the same quality and finish so there is no difference between social, affordable and private apartments. Harts Landing has created real opportunities for individuals to embark on their journey to greater independence and, where there is appropriate capacity, to transition from the social housing units to affordable housing.

- Recently completed affordable housing project at Newcastle is a great example of strategic partnerships. Evolve Housing won the tender to deliver the project after a competitive Expression of Interest process in 2018 with the Hunter and Central Coast Development Corporation (HCCDC). Tender included a capital grant of \$5M from HCCDC. Project provides much needed 30 affordable housing dwellings in the heart of Newcastle CBD. There are one-two -three- bedroom apartments. Four apartments are constructed to suit Specialist Disability Accommodation. Facilities include a ground floor car park and two communal roof top terrace areas. There are retail tenancies in the building. The property is close to many CBD amenities including the light rail, a university and the Civic Cultural Precinct and Honeysuckle foreshore.

- 
- Utilised ground breaking modular design to develop an affordable 4-storey development consisting of 23 micro-studio apartment housing up to 36 people including a studio for the onsite care taker management. Four of the apartments are accessible. This innovative building technique increases the speed with which affordable housing can be delivered and reduces costs. This can be especially effective on smaller sites.
  - A transitional housing model working with Women’s Community Shelters in Western Sydney. This model enables women and children fleeing Domestic and Family violence to enter into an affordable rental property for up to three years, supported by a strength based personal support plan to address personal health and well-being issues and assist them to develop skills or training to access employment with the aim that they are able to successfully support themselves in the private market after 3 years. As employment is secured by tenants, over time rents are gradually increased until they are equivalent to the median market rental costs the household would need to pay in the same or a neighboring LGA to secure a property. Support is also provided to tenants in the areas of financial management and access to relevant support services is facilitated to assist tenants getting their lives back on track.
  - Developed Specialist Disability Accommodation (SDA) to meet the growing need for access to affordable dwellings for people with disabilities. Evolve Housing has won awards for its SDA housing. Evolve also manages disability accommodation on behalf of other owners.
  - We have also been at the forefront of providing more sustainable housing. Our Green objectives include: sustainable design of new buildings; reducing energy poverty and inequality; reducing carbon emissions; and driving down operating costs of residential buildings common areas. We have applied these principles both to existing housing and to new built housing. Lower income residents have little ability to choose green technologies due to cost constraints but are the most vulnerable to energy price rises. To address this Evolve Housing has employed a combination of replacing aged and inefficient hot water systems, the use of solar panels as well as new efficient lighting in common areas to deliver savings of approximately \$860 per household.
  -  had recently been awarded the management of 62 units in Homebush for the Sydney Olympic Park Authority and a further 25 affordable housing units will be delivered in the next 1-3 years, which displays a positive partnership between the two entities.

#### response to the key sections of the Local Housing Strategy

 welcomes the Council’s commitment to develop a comprehensive Local Housing Strategy and its understanding of issues related to mortgage and rental stress and homelessness. We commend Hawkesbury council for having a vision for being inclusive for more diverse, affordable community whilst not overlooking the local character and respecting environmental constraints.

 calls in all levels of government and other stakeholders like private and community sector to support Council’s vision of adopting Sustainable Development goals and New Urban





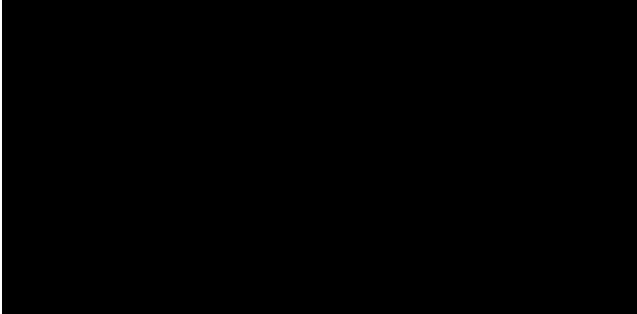
Agenda to take their LHS in a positive direction.

- [REDACTED] notes that there is a demand of 1150 new dwellings between 2016 and 2021 (p.9-10). Out of which 659 dwellings are completed by 2019 and further 385 are in pipeline from 2019-2021. There are still 106 dwellings, which needs to be delivered as per the Greater Sydney Commission recommendations for Hawkesbury LGA. We recommend Council to mandate a proportion of all new dwellings be allocated for social and affordable housing to ensure properties remains affordable for the local community.

## **2.0 - Planning Policy and Context:**

### 2.2 – Hawkesbury City Council Policies

- We commend Council's initiative to prepare its Community Strategic Plan (CSP) for LGA that captures Council's commitment to provide affordable housing to meet the needs imposed by the local community (2.2.1; p.29). Evolve Housing will be happy to work with Council and assist them in achieving their commitment.
- We note that from the CSP, Council is also considering to meet diverse housing needs of the community through research, active partnerships and planned development (2.2.1; p.29). [REDACTED] has delivered a wide range of projects on residential and mix-use zones from small scale infill 8-10 dwelling developments to medium scale 40 units and larger - 200 plus residential unit developments (in 3 mixed tenure residential towers) as well as Specialist Disability Housing (group home style) and Affordable New age boarding houses. [REDACTED] would be happy to share their experience from the perspective of a provider of affordable housing about what may be required for various zones on different sites to be commercially viable.
- We commend Council for having an active Affordable Housing Working Group and preparation of Western City Affordable Housing Strategy in partnership with Western District City councils to suitably respond to the growing housing needs of low to middle income groups in the LGA (2.2.3; p29-30). We also note that Council had prepared an Affordable Housing Policy in 2015 in response to the steady decline in the supply of affordable housing. We would encourage 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 LSPS and LHS moving forward as the next step.
- The LHS should commit to develop and implement Council's Local Affordable Housing Strategy. The affordable strategy should then clearly set social and affordable housing targets and investigate specific sites to consolidate affordable housing provision in fewer well located projects. 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. Consolidating affordable housing in a fewer well located projects (while avoiding over concentration in any one area) can achieve efficiencies in both development and operational phases. These projects could be delivered by CHPs, similar to our Penrith project as outlined above. Housing



developed by CHPs will remain available in perpetuity for affordable housing purposes. Hawkesbury City Council's approach to identifying suitable precincts for affordable housing may facilitate such opportunities. We are keen to work with Council to achieve the SAH target in the Hawkesbury LGA.

- We support Council's Housing Forum Working Group's initiative to compile *Homelessness Action Plan (2014)* to identify the issue in the area and reduce the occurrence of homeless in the LGA (2.2.4; p.30-31). We note that through this plan, Council is trying to mitigate the risks of people losing their homes and we support their noble initiatives in this field. 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 wraparound supports.<sup>i</sup> [REDACTED] 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. The program commenced in July 2020, currently having 36 active engagements under [REDACTED] on a pathway to a safe shelter. We have already housed 5 people out of which 3 now resides in the suburbs of Guildford and Wentworthville. There are 12 more homeless people on their way to be accommodated in Cumberland or Parramatta region. We recommend Council to further advocate State and Federal governments to invest more in such programs, which will help in eradication of the issue more swiftly and effectively.

### 2.3 Statutory Planning Policies

- We understand that Council is considering various State Environmental Planning Policies (SEPPs) to include in their LHS including Senior SEPP, ARH SEPP 2009, SEPP 65 and SEPP 2008. We would propose that the LHS should be further refined once Housing Diversity SEPP is finalised to embrace the updated regulations in place.
  - [REDACTED] 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. [REDACTED] proposes to work in collaboration with Council to achieve the Council's objective of increasing the supply affordable housing. We are currently working on a Project with another Council where Evolve Housing has offered to contribute through its debt and equity contributions to acquire additional dwellings (almost 3 times of the number of units that developer has recommended for affordable housing).
- We commend that Council has acknowledged availability and affordability of rental accommodation as an important factor for migration of young population (mostly students and one person household) for tertiary education or employment to (p.2). 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. [REDACTED] [REDACTED] has been advocating this concept and would be keen to work with Council and other

government agencies to deliver on this initiative.

### 3.0 – Evidence of housing needs:

#### 3.1 – Demographic Overview

- [REDACTED] notes that weekly median household income within Hawkesbury LGA is \$1663 which is less compared to the Greater Sydney Average. According to census 2016<sup>ii</sup> households between low to middle income group (see table below) comprise a total of 78.9% within Hawkesbury LGA which is higher as compared to Greater Sydney's average of 72%. This clearly indicates high need of affordable housing in the LGA. We encourage Council to partner with one or more community housing providers or similar agencies to meet this growing demand of SAH in the community.

Hawkesbury City - Persons	2016			
	Number	%.	Greater Sydney	Number
Lowest group (\$0 - \$638)	7972	25.2	22.8	7811
Medium lowest (\$639 - \$1030)	8303	26.3	23.5	7958
Medium highest (\$1031 - \$1623)	8679	27.4	25.7	8373
Highest group (\$1624 and over)	6670	21.1	28	6072
Total Persons	31623	100	100	30214

#### 3.2 – Housing demand & 3.3 – Housing Supply


We note that 84.8 % of all dwellings are 'separate houses' (3.3.1; p.70) within the Hawkesbury LGA. This is a significantly higher percentage of separate houses when compared with Greater Sydney average. Lack of medium density housing options could be contributing to affordability challenges in the LGA. We encourage Council to identify suitable redevelopment sites within its ownership and in partnership with land owners to provide range of housing options across the affordability spectrum.

#### 3.4 – Projected housing demand

- [REDACTED] notes that an additional 8,000 dwellings will be needed in the 20 years 2016 to 2036 (3.4.2; p.80) as per Department of Planning projections, or about 4,000 dwellings as per Council's historical data. We would be happy to share our experience in bringing in the right housing type at the right locations bringing in the best low cost solution on site as described in the paper earlier.  
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).


#### 3.5 – Housing Stress & 3.6 Housing supply gaps

- [REDACTED] notes that approx. 30.2% of households experienced rental stress and 8.9% of households experienced mortgage stress (3.5.3; p.85-86). Rental stress has a high percentage and may lead to increase in homelessness in the LGA.
- We commend Council for deriving the need of more affordable housing for low to middle income groups and implications from their evidence base (*Table 18 – Summary of Housing*




*needs*; p.87) to increase the affordable housing in the LGA through various mechanisms. Evolve Housing would be happy to partner with Council on delivering and managing SAH in Hawkesbury community.

## **5.2 – Housing diversity**

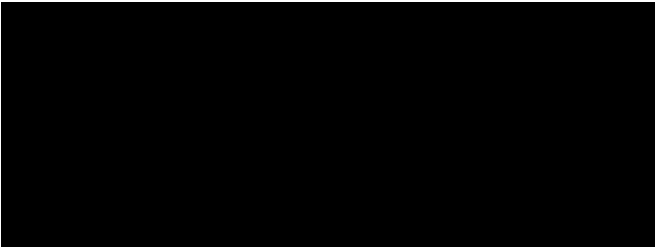
-  notes that a diverse range of housing will be needed in Hawkesbury (p.127). We would encourage Council to expand the housing diversity to include more studios, one bedroom apartments, group homes, senior housing and especially secondary dwellings to suit varied needs of the community. Evolve Housing 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.
- 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.

## **6.3 – Strategic directions and actions**

- We agree with Council to facilitate supply of smaller dwellings (6.3.3; p.155). Smaller dwellings can be encouraged by enabling medium density development which tends to result in small dwellings or by encouraging the uptake of the affordable rental housing SEPP.
- We support Councils intention to continue expanding affordable housing options in the LGA (6.3.4; p156) and Evolve Housing is willing to assist Council to achieve the affordable housing target on both infill development and greenfield sites. We also encourage Council to develop partnerships with Community Housing Providers, NSW Land and Housing Corporation and other not for profit land owning entities and to ensure the delivery of a range of affordable rental housing opportunities.
-  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).

### **Why should affordable rental housing be a priority for your community?**

Our organisation sees working families in housing stress who are struggling to keep housing connections to the places where they live or work. We also see the increasing vulnerability of older single women, youth who are unable to meet rising rental accommodation costs and women



escaping domestic & family violence in search of housing support as a bare minimum necessity for life.

Affordable rental housing is essential infrastructure and is critical to strong, diverse and livable communities. Stable, affordable accommodation allows children to access and maintain contact with schooling and parents, which enables the family to have a base from which they can seek and maintain employment. Well-located affordable rental housing throughout the Sydney Metropolitan area and large regional centres, means that people in lower paid jobs can live in the communities that they work and thrive in.

The social and economic impacts from the lack of affordable rental housing can be significant. The Strengthening Economic Cases for Housing Report<sup>iii</sup> measured some of the direct impacts of building more affordable housing near jobs and services can have on individuals and on our economy. This research indicates that by building affordable rental housing near to jobs and services there will be direct benefits to the economy, including:

- 2.26 billion in travel time savings
- \$736 million that consumers can spend in local communities
- \$12 billion in increased household earnings and labour productivity
- The social impacts of the lack of affordable rental housing can be significant.

Maclennan estimates that across Sydney, moderate income renters are typically paying around \$6,000 per year in rent above a 30% threshold of household income in rent. ABS data indicates that 14.2% of Sydney renters are in housing stress, an increase of nearly 13% since 2011.


### **Affordable Housing need in the Hawkesbury LGA**

In late 2018, the NSW Federation of Housing Associations commissioned SGS Economics and Planning to estimate the current and future, unmet demand for Social and Affordable housing within the Western Sydney City Deal area. The report estimated the shortfall in supply of SAH in Hawkesbury to be 2999 dwelling in 2036<sup>iv</sup> (also informed by Wentworth Housing in LHS).

Council has compiled evidence that the gap between household income and cost of housing was widening in the lowest and medium lowest income groups leading to greater housing stress and homelessness for increasing families and individuals. (2.2.3; p.30). This is affirming that housing system has grown increasingly out of alignment with the housing needs of low to moderate income households.

Housing stress is the main risk factor for homelessness. The 2016 Census estimated that there were 37,715 people experiencing homelessness in NSW, a 37% increase from 2011<sup>v</sup>. There was also a 74% increase in people living in severely overcrowded homes, a symptom of housing affordability challenges and the inadequacy of housing types.

Increasing private rental costs in housing markets and limited affordable alternatives can lead to lower income households being displaced, with the risk that they lose connections with families, friends and support networks as well as schools and health services.



We commend the Council's commitment to grow and improve the provision of social and affordable housing in the LGA. We also commend on Council's actions to seek a coordinated approach to address homelessness in the LGA. However, there is greater percentage of housing stress (rental and mortgage) in Hawkesbury, suggesting there is a risk of people becoming homeless in future.

### **The benefits of working with [REDACTED] registered community housing provider**

[REDACTED] is uniquely placed to develop affordable rental housing being a registered not-for-profit community housing provider in NSW. Evolve Housing:

- is charitable not-for-profit organisations that do not require developer margins
- reinvest its surpluses in expanding its housing services
- design and build housing to meet local needs for people in need
- is fully responsible for the ongoing management and maintenance of the housing it develop
- preserve social and affordable housing for the long term through community ownership
- is independently regulated under the National Regulatory System for Community Housing (NRSCH)
- is experienced partner to local government able to deliver on local strategic priorities
- has access to National Housing Finance Investment Corporation (NHFIC) loan funds and Infrastructure Fund

### **Mechanisms for delivering affordable rental homes**

[REDACTED] supports the use of State Environment Planning Policy no. 70 – Affordable Housing Revised Schemes) as the principle mechanism for delivering affordable housing through the planning system in Sydney.

The NSW Government increased its support for the use of SEPP 70 by including all local councils in the SEPP in 2019.

SEPP 70 provides a framework for local councils to design affordable housing contribution schemes, which ensure development remains viable, and delivers affordable rental housing for communities. The inclusionary zoning mechanism in the City of Sydney's affordable rental housing scheme established under this SEPP demonstrates that this approach does:

- deliver moderate increases in the supply of affordable rental housing supply
- not affect the viability of new housing supply developments
- provide certainty for landowners, developers and the community about the requirements around affordable rental housing development contributions
- reduce use of Voluntary Planning Agreements (VPA) which have had a very limited impact on affordable rental housing supply and are not open to community scrutiny or consistently negotiated.



## Partnering with Community Housing Providers

██████████ also encourages councils to consider partnering with registered community housing providers to develop council owned land to deliver affordable rental housing for local people in need.

██████████ would be happy to work with Council to explore options such as requiring transitional accommodation for women escaping domestic violence to be developed in partnership with ██████████ and for ██████████ to manage to ensure development is targeted to low income earners as a means of providing low cost accommodation in the community. Some other options to achieve required affordable housing may include;

- **Consolidating Affordable Housing**

Council could target a small number of developments that primarily target affordable housing instead of sprinkling 5-10% affordable housing in every development project. Consolidating affordable housing in a fewer projects would still achieve the required numbers for affordable housing and these projects could be delivered by CHPs, similar to our Penrith project as outlined above. Delivery of affordable housing through such developments would achieve desired efficiency, in both development and operational phase and will remain available in perpetuity for affordable housing purposes. Hawkesbury's regional approach to affordable housing may facilitate such opportunities.

- **Voluntary Planning Agreements**

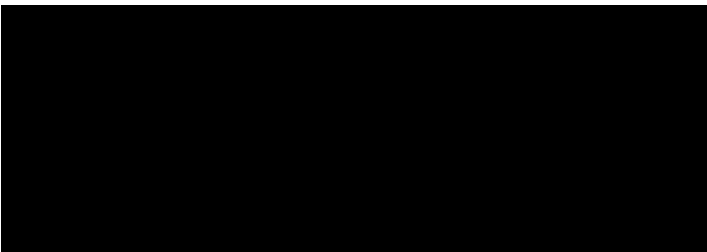
Other options Council may consider is to enter into VPAs with developers with a view to collect and transfer affordable housing contribution to nominated CHP, such as ██████████ with a requirement that Evolve Housing would further enhance the cash contribution received from Council with its own equity and debt to develop additional affordable housing. A consistent target is our preferred option but we understand many Councils in the absence of SEPP 70 have relied on VPAs or may rely on these where there are limited opportunities for redevelopment.

Examples of such arrangements where either funds collected when a rezoning occurs as part of established affordable housing targets and an Affordable Housing Contributions Plan or funds collected under VPAS have been transferred include; City West Housing that receives regular contribution from Sydney City Council, similarly Penrith City Council have provided a one –off funding to a community housing provider that operate in Penrith LGA.

## Recommendations

██████████ recommends that Hawkesbury Council as part of the development of its current Local Housing Strategy –


- Commit to develop a comprehensive Local Affordable Housing Strategy/Policy.
- Include Affordable Housing as one of LHS's housing priority.
- Set clear targets of Social and Affordable housing to be delivered in the next 20 years through



their LHS.

- Confirm the sites and growth precincts identified for additional residential capacity where a rezoning proposal will give rise to the requirement for affordable housing provision following viability testing.
- Leverage on opportunities available to the Council such as partnering with registered community housing provider such as Evolve Housing to redevelop Council owned land to develop affordable housing.
- Include additional local data about housing affordability in the LHS [for example, existing affordable housing rental stock (exclusive of Social housing), rough sleeper population in the LGA].
- Establish a monitoring mechanism to track delivery of affordable Housing against the Council's target.
- Strengthen and clarify commentary around housing diversity and include the planning mechanisms Council will use to promote a more diverse housing supply like secondary dwellings and/or Micro-studio apartments.
- Consider consolidating affordable housing provision on well-located sites (avoiding unacceptable concentrations) to achieve efficiencies within areas identified for affordable housing contributions
- Consider mandating dwelling mix in strategic centres to ensure there is a supply of dwellings that are adapted to the needs of all community members.
- Find mechanisms to increase the SAH provision in the community in multifold to level up with the current shortfall by collaborating with government agencies or community housing providers utilizing their experience.
- Investigate whether new generation student accommodation and senior housing should only be allowed if developed with and managed by a community housing providers to ensure they are rented at affordable rents.
- Commit to seeking approval for affordable housing contributions schemes under SEPP 70 or Housing diversity SEPP when it comes into effect.
- Consider exemptions for Community Housing Providers considering they are delivering essential infrastructure under the form of social and affordable housing.
- Commit to advocate to NSW and Federal Governments for more social and affordable housing in Hawkesbury LGA.
- Support the developments of boarding houses and student housing with small scale retail opportunities in the Hobartville area. (We support this, as adequate supply will help to prevent competition by students and keyworkers for general affordable rental housing in the community).
- Work with State and Federal Government to ensure the development of existing government owned land substantially increases the provision of social and affordable housing.

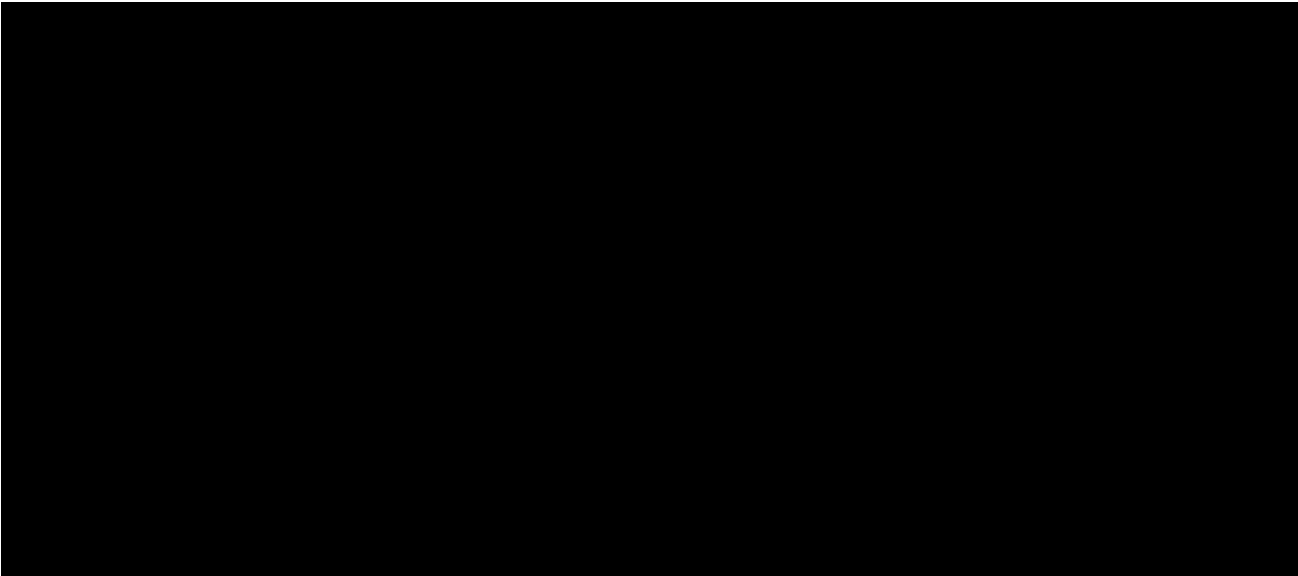




We commend and support your Draft Local Housing Strategy - August 2020 currently on exhibition. As experienced partners of local government we would be happy to work with you to help deliver on your Housing Priorities for Social and Affordable Housing. Our CEO Lyall Gorman and members of my team would be pleased to meet with you to discuss potential assistance or opportunities to work together to deliver more affordable housing to meet your community's needs.

If you would like to meet please contact Jitender Balani, as per below contact details who will work with you to arrange a suitable time.

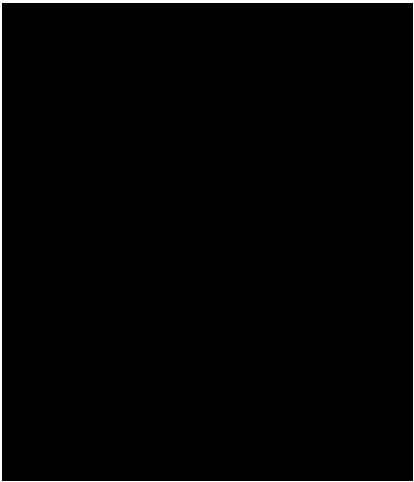
Yours sincerely





24 September 2020


General Manager  
Hawkesbury Council  
PO Box 146  
WINDSOR NSW 2756




By email: council@hawkesbury.nsw.gov.au

Dear General Manager,


**Re: Draft Local Housing Strategy**

The ) welcomes the opportunity to provide a submission to the *Draft Hawkesbury Local Housing Strategy*.

 is a member and volunteer-based organisation that has been assisting people experiencing poverty and disadvantage across NSW for over 135 years.

Every day, our members visit people in need of support across the Hawkesbury and surrounding areas, providing them with food hampers, supermarket vouchers, EAPA vouchers and other material assistance. We also offer crisis and transitional accommodation, together with case management and wrap around support services, for people experiencing homelessness.

Presently, more than 10 per cent of households in the Hawkesbury, and up to 25 per cent of households in some areas of the LGA, are experiencing housing stress, in that they spend more than 30 per cent of their household income on housing.<sup>i</sup> At the same time, almost 800 people are waiting for social housing in the Richmond/Windsor allocation zone. The waiting time is more than 10 years for one and three bedroom properties and is up to 10 years for two bedroom homes.<sup>ii</sup> Concurrently, 250 people are experiencing homelessness across the Hawkesbury electorate, an 11 per cent increase since 2011.<sup>iii</sup>

 sees the people behind these statistics every day. Many seek financial support because the high cost of housing means they do not have enough money to pay for food or electricity. Others need crisis or transitional accommodation because they cannot afford to pay rent in the private market and there is a lack of social and affordable housing. For some who struggle to make ends meet, the high cost of housing means living in overcrowded or inappropriate accommodation. In the most tragic of circumstances, it can mean staying at home with a violent partner.

Councils have a vital role to play in ensuring everyone has a place to live in their local communities – by increasing the supply of both social and affordable housing.



## **Andrew Kearns**

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**From:** Your Hawkesbury Your Say <notifications@engagementhq.com>  
**Sent:** Monday, 21 September 2020 5:31 PM  
**To:** Andrew Kearns; Melissa Barry; Hawkesbury City Council  
**Subject:** Anonymous User completed Exhibition of Draft Hawkesbury Local Housing Strategy Submission

Anonymous User just submitted the survey Exhibition of Draft Hawkesbury Local Housing Strategy Submission with the responses below.

### **Name**

[REDACTED]

### **Address**

[REDACTED]

### **Submission**

I 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.

### **Email address**

[REDACTED]

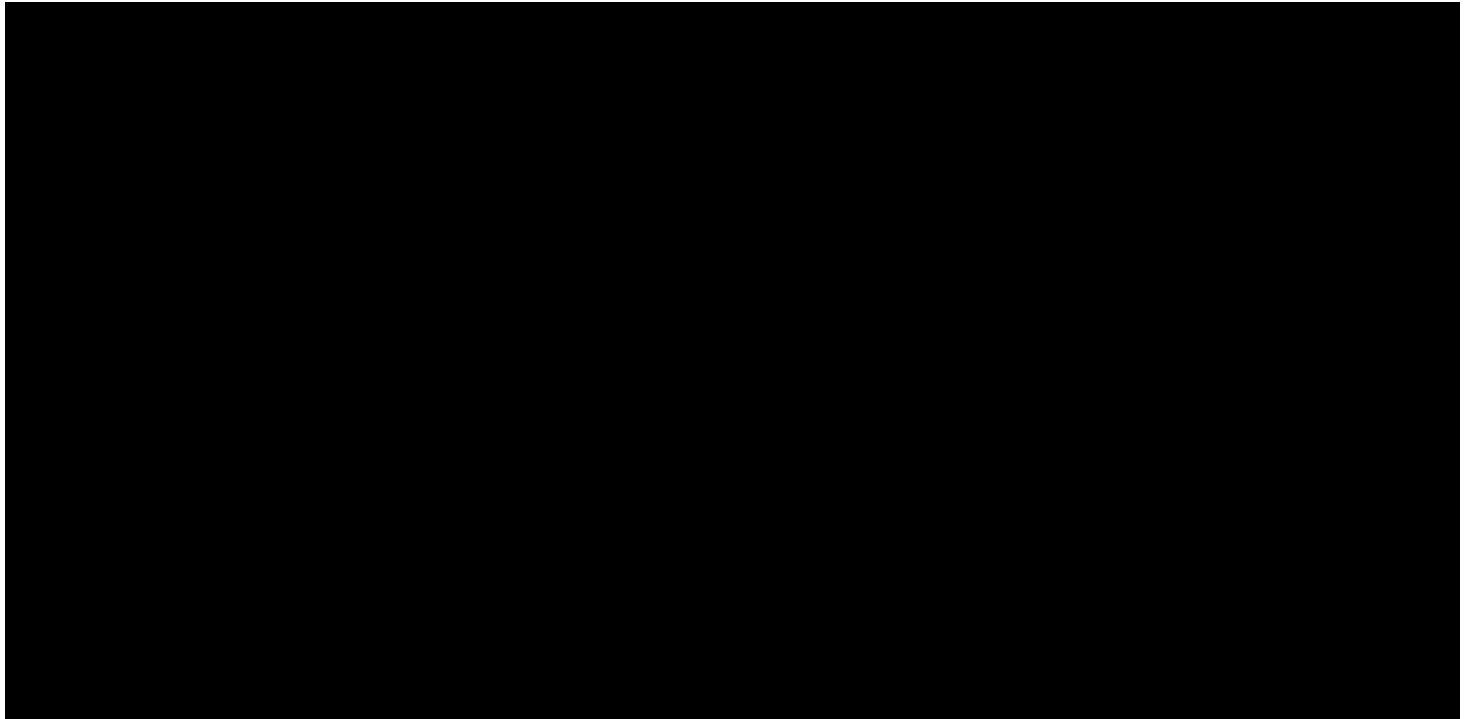
### **Screen Name**

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thu, 1 Oct 2020 13:48:58 +1000  
**To:** Hawkesbury City Council  
**Subject:** Submission to Draft Hawkesbury Local Housing Strategy  
**Attachments:** Submission Draft Hawkesbury Local Housing Strategy.pdf

Please find attached our submission to the draft strategy.

Kind regards,



[REDACTED]

1 October 2020

The General Manager  
Hawkesbury City Council  
PO Box 146  
**WINDSOR NSW 2756**

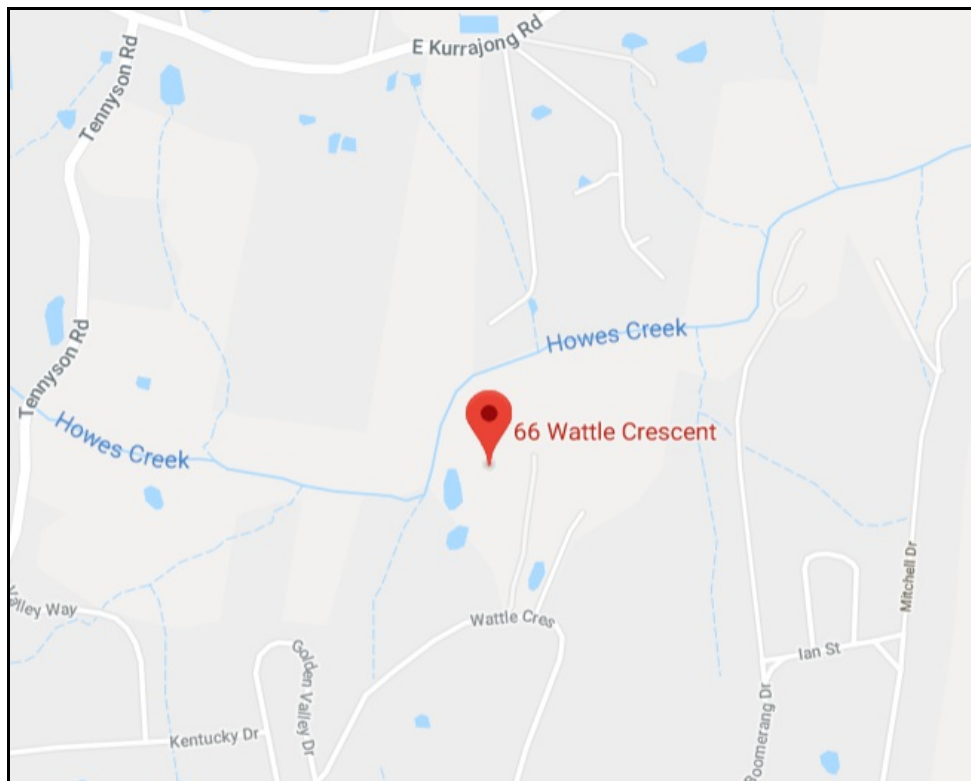
[REDACTED]

Dear Sir,

**Draft Hawkesbury Local Housing Strategy**

---

We have been approached by the owners [REDACTED] to prepare a submission to the Draft Hawkesbury Local Housing Strategy with regard to the possible change to the current planning controls relating to the Site to permit large lot residential development in the form of Torrens Title subdivision with minimum lot size lower than the 40 hectare minimum lot size applying to the Site and the surrounding area. **Figure 1** shows the Site location.



The Site has an area of approximately 8.366 hectares and is legally defined as:

[REDACTED]  
**GLOSSODIA**

An extract from an aerial photograph of the Site is at **Figure 2**.



**Figure 2:** Extract from an aerial photograph with the Site highlighted in yellow. © SIX Maps

The Site is located on the northern side of Wattle Crescent and is bound in the north by Howes Creek.

The Site is not flood prone.

Some of the vegetation on the Site has been identified as Shale Sandstone Transition Forest, which is a critically endangered Ecological Community under the *Biodiversity Conservation Act 2016*.

The Site is zoned R2 Low Density Residential pursuant to the Hawkesbury Local Environmental Plan 2012 (**LEP 2012**).

An extract from the LEP 2012 Map is at **Figure 3**.

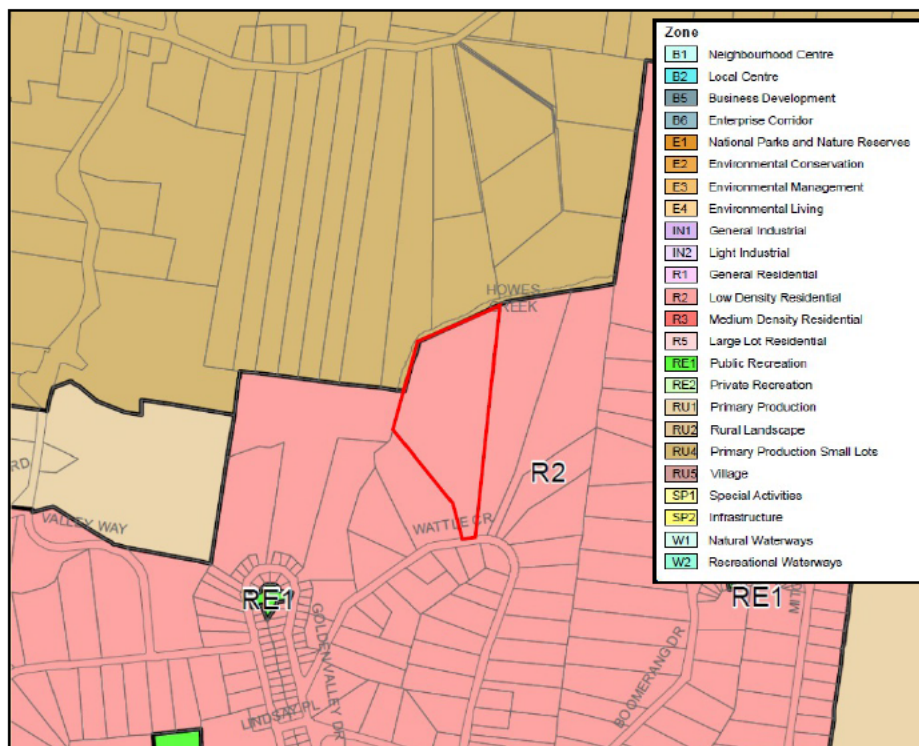


Figure 3: Extract from the LEP 2012 Map with the Site outlined in red.

### **Draft Hawkesbury Local Housing Strategy**

The Hawkesbury Local Housing Strategy (**the Strategy**) is intended to set a clear plan to deliver the housing vision in the Hawkesbury LGA over the next 20 years. In this regard the Strategy states:

*The objectives of the Strategy are:*

- *To identify housing needed to accommodate the future population to 2036.*
- *To formulate a plan for housing delivery that is based in a considered analysis of a comprehensive evidence base on housing needs, infrastructure availability, physical constraints and present opportunities.*
- *To align housing delivery with the NSW Government's strategic plans.*

*The housing strategy is to deliver on the Greater Sydney Commission's requirements set out in Objective 10 and Objective 11 of the Greater Sydney Region Plan which include:*

- *Creating capacity for more housing in the right locations.*
- *Supporting planning and delivery of growth areas and planned precincts as relevant to each local government area.*
- *Supporting investigation of opportunities for alignment with investment in regional and district infrastructure.*
- *Supporting the role of centres.*



- *Supporting the delivery of a diversity of housing.*
- *Ensuring that housing range and supply are better suited/matched to population over time.*

*This Strategy sets out a local delivery response to the housing components of the NSW Government's Western City District Plan and A Metropolis of Three Cities.*

The Strategy states:

*The Western City District Plan sets a housing target of 39,850 additional dwellings in the District by 2021 of which 1,150 are to be in Hawkesbury LGA. This Local Housing Strategy will need to guide where and how these additional dwellings are going to be delivered.*

*The District Plan indicates that the Hawkesbury Local Housing Strategy should address the following:*

- *The delivery of five-year housing supply targets for each local government area.*
- *The delivery of 6-10 year (when agreed) housing supply targets for each local government area.*
- *Capacity to contribute to the longer-term 20-year strategic housing target for the District.*
- *Creating capacity for more housing in the right locations.*
- *Supporting planning and delivery of growth areas and planned precincts as relevant to each local government area.*
- *Supporting investigation of opportunities for alignment with investment in regional and district infrastructure.*
- *Supporting the role of centres.*

With regard to the LEP 2012, the Strategy states, inter alia:

*Hawkesbury LEP 2012 is the planning instrument that applies to the Hawkesbury LGA, apart from the Vineyard Precinct which is covered by the Growth Centres SEPP. The principal land use controls that relate to the built form of housing in Hawkesbury include:*

- *Land use zoning: Which housing types are permissible and where.*
- *Built form and density related controls including:*
  - *Minimum lot size: How small a lot can be*
  - *Height: How tall a building can be.*
- *Floor space ratio controls, which control the size of buildings relative to the lot they are*

on, are not enabled by the LEP. .... **Council has indicated that with the introduction of the Standard Instrument, there were certain limitations in the translation of the previous Hawkesbury LEP 1989 into the standardised template. Consequently, some provisions in the 2012 LEP did not always accurately reflect previous provisions.**  
[emphasis added]

The Strategy continues:

*The review of Hawkesbury LGA's planning controls has the following implications for a Local Housing Strategy:*

- *Opportunities for denser typologies (eg residential flat buildings and shop top housing) are limited to R3 Medium Density Residential, B1 Neighbourhood Centre and B2 Local Centre zones*
- *B1 Neighbourhood Centre and B2 Local Centre zones permit residential flat buildings, potentially allowing for dwellings with no commercial components, with potential effects to the liveability of surrounding areas*
- *B1 Neighbourhood Centre and B2 Local Centre zones permit shop top housing, with Hawkesbury DCP providing limited design guidance to encourage high-quality outcomes*
- *Maximum height controls in centres are likely too low to encourage high-quality mid-rise development. Opportunities exist to fine-tune height controls to be sensitive to flood risk and mitigation measures, while encouraging targeted mid-rise residential outcomes in centres*
- *Landscaping and site coverage provisions in the Hawkesbury DCP provide clear expectations regarding the provision and protection of the natural environment. Additional guidance regarding centres would carry those principles into more built-up areas*
- *Relying on Hawkesbury DCP provisions to guide density outcomes, while not adopting FSR controls, relies on non-statutory controls and as the potential to lead to inconsistent application of variations to those controls. Targeted FSR controls in centres would provide clear guidance on Council's preferred built form outcomes*
- *Hawkesbury DCP provides limited guidance for non-separated house controls, potentially discouraging lower-impact housing types by requiring they conform with separated house-focused controls*
- *RU5 Large Lot Residential zones, combined with high minimum lot sizes, provide very limited housing supply while increasing stress on infrastructure and services*
- *Any proposal to rezone rural or environmental protection land will need to consider and meet the requirements outlined in s9.1 Local Planning Direction 1.5 Rural Lands, noting Hawkesbury's rural land is highlighted as part of the valued Metropolitan Rural Area within the Western City District Plan.*

One of the key housing needs identified in the Strategy is:

- 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.

The Strategy identifies a number of constraints to development and states:

*As discussed in Section 4, the Hawkesbury LGA is heavily constrained by both natural and built form constraints. The Hawkesbury LGA is approximately 2,800 square kilometres in area, with the primary residential zones of R1 General Residential, R2 Low Density Residential, R3 Medium Design Residential and R5 Large Lot Residential comprising 2,909 ha. Of that area, approximately 494 ha (17 per cent) is flood affected, 1,313 ha (45 per cent) is bushfire prone and 1,571ha (54 per cent) is neither mapped as flood-affected or bushfire prone. Additional concerns, such as biodiversity and rural production further constrain development within the LGA.*

*Planning controls relating to these constraints are largely contained within Part 5 and 6 of the LEP, requiring Council to be satisfied that on and off-site impacts are suitable. While impacts of development are mitigated through on-site design responses or a statutory prohibition of development, development can potentially impact environmental elements or safety in the surrounding area. Impacts relating to flooding can be long-lasting, with development potentially increasing or intensifying flooding by reducing permeable land area or diverting flows. On-site design responses, such as increasing the height of development, may reduce on-site impacts at the expense of the surrounding area. Similarly, development in bushfire prone areas can increase exposure to bush fire attack or pressure evacuation routes.*

*These constraints place multiple statutory responsibilities on Council to ensure that development is appropriate both from an environmental conservation, but also from a property and human safety perspective. The nature and severity of these constraints severely limit opportunities for additional housing. In particular, key stakeholders have confirmed that there is very limited potential to increase housing and population within the established urban areas due to capacity constraints on flood evacuation routes and limited evacuation times. At present, only modest increases in housing delivery in these areas can be considered. This situation could change in the future depending on the outcome of the NSW Government's Warragamba Dam Raising project and other flood mitigation measures.*

**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.**

The Site and surrounding area are already zoned R2 Low Density. The objectives of that zone are:

- *To provide for the housing needs of the community within a low density residential environment.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*

- 
- *To protect the character of traditional residential development and streetscapes.*
  - *To ensure that new development retains and enhances that character.*
  - *To ensure that development is sympathetic to the natural environment and ecological processes of the area.*
  - *To enable development for purposes other than residential only if it is compatible with the character of the living area and has a domestic scale.*
  - *To ensure that water supply and sewage disposal on each resultant lot of a subdivision is provided to the satisfaction of the Council.*
  - *To ensure that development does not create unreasonable demands for the provision or extension of public amenities or services.*

**Clause 4.1** of LEP 2012 deals with minimum subdivision lot size and states, inter alia:

- (1) *The objectives of this clause are as follows:*
  - (a) *to ensure that the pattern of lots created by subdivision and the location of any buildings on those lots will minimise the impact on any threatened species, populations or endangered ecological community or regionally significant wetland, waterways and groundwater as well as any agricultural activity in the vicinity,*
  - (b) *to ensure that each lot created in a subdivision contains a suitable area for the erection of a dwelling house, an appropriate asset protection zone relating to bush fire hazard and a location for on-site effluent disposal if sewerage is not available,*
  - (c) *to ensure a ratio between the depth of the lot and the frontage of the lot that is satisfactory having regard to the purpose for which the lot is to be used.*
- (2) *This clause applies to a subdivision of any land shown on the Lot Size Map that requires development consent and that is carried out after the commencement of this Plan.*
- (3) *The size of any lot resulting from a subdivision of land to which this clause applies is not to be less than the minimum size shown on the Lot Size Map in relation to that land.*

With regard to the Site and its surrounding area, **Figure 4** shows that the minimum lot size for subdivision relating to the Site is 40 hectares.

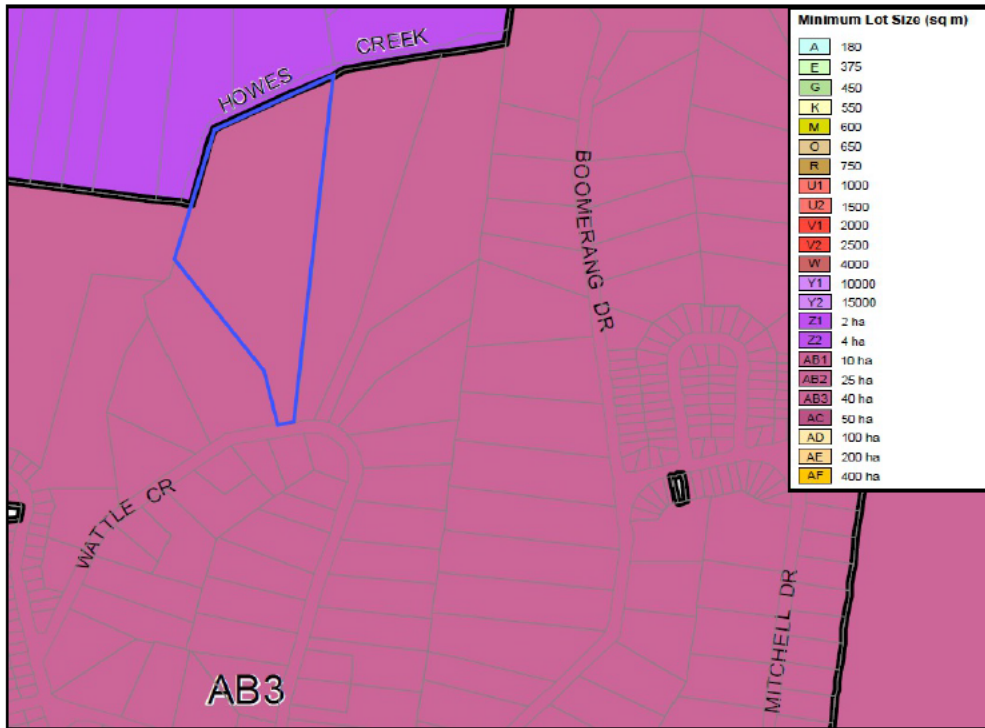


Figure 4: Extract from the Lot Size Map of LEP 2012 with the Site outlined in blue.

The Site and surrounding area contains vegetation to which **Clause 6.4** of LEP 2012 applies as show in **Figure 5**.

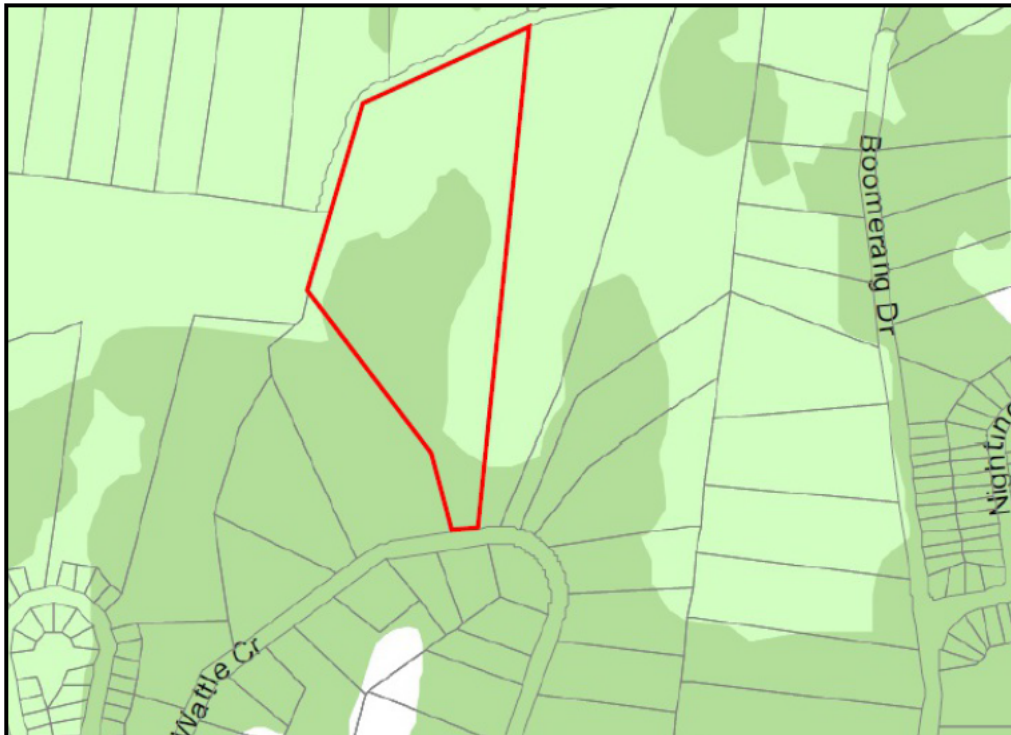


Figure 5: Extract from the Terrestrial Biodiversity Map of LEP 2012 with the Site outlined in red.

The Site is located on the Council Bushfire Prone Land Map, an extract from which is at **Figure 6**.

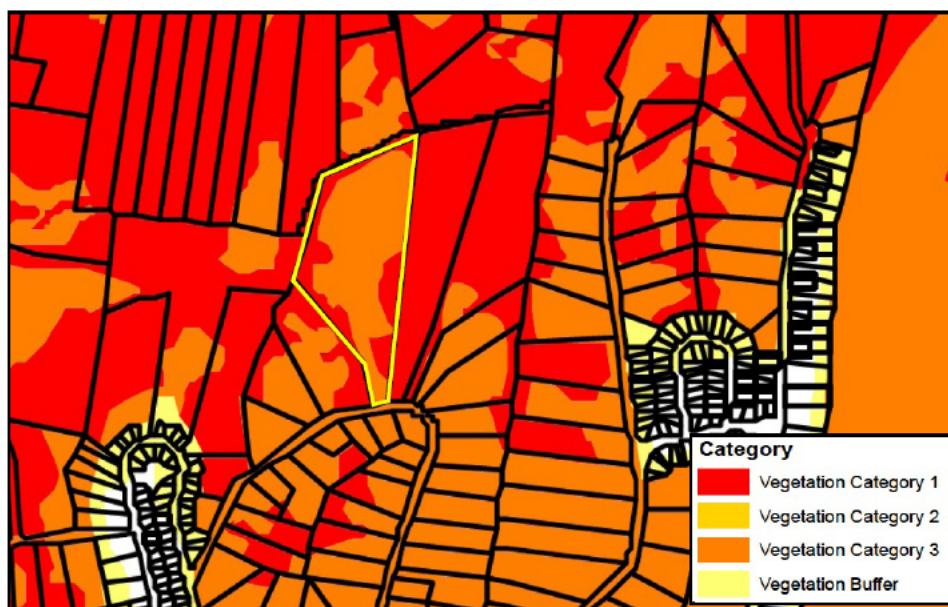


Figure 6: Extract from the Bushfire Prone Land Map.

From **Figures 3 and 6**, it can be seen that there are a number of different lot sizes in the locality of the Site all of which are within the R2 Low Density Residential zone where the existing lot sizes are significant less than the 40 hectare minimum lot size which applies to the locality.

Hawkesbury Council, when preparing LEP 2012, undertook a strategic planning exercise to determine how the various sectors of the Hawkesbury local government area would be planned. In the case of the Site and its surrounding locality, Council concluded that the R2 Low Density Residential zone was appropriate. Having regard to that low density zone, there is a discrepancy within the subdivision pattern in this section of Glossodia where all lots are much smaller than the 40 hectare lot size, the 40 hectare lot size being more akin to a large lot rural area.

The NSW Planning Framework has set future housing targets for Hawkesbury. Rectifying the minimum lot size of these 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.

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.

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.

Council should think strategically and exploit the currently appropriate zoned land to bank for future local housing demands.

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.

As Council is aware, there have been extensive studies of the Site undertaken by both our client and the Council as part of the recent case before the Land and Environment Court, those studies including:

- contamination
- flora and fauna
- bushfire
- provision of sewerage and drainage facilities
- biodiversity.

The abovementioned studies provide significant input into the establishment of both the number and location of any Torrens Title lots on the Site which would form the basis of a reduction in the minimum lot size for the Site and, possibly, the surrounding area.

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.

Yours faithfully,

[Redacted signature]

[Redacted name]

[Redacted contact information]

[Redacted footer line]

## Andrew Kearns

---

**From:** Your Hawkesbury Your Say <notifications@engagementhq.com>  
**Sent:** Tuesday, 22 September 2020 1:17 PM  
**To:** Andrew Kearns; Melissa Barry; Hawkesbury City Council  
**Subject:** Anonymous User completed Exhibition of Draft Hawkesbury Local Housing Strategy Submission

Anonymous User just submitted the survey Exhibition of Draft Hawkesbury Local Housing Strategy Submission with the responses below.

### Name

[REDACTED]

### Address

[REDACTED]

### Submission

I am the owner of three properties in the Hawkesbury council area and have read the 165 page draft proposal and wish to advise the following: 1. 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. 2. All subdivisions should be on the Sydney side of the Hawkesbury River until roads and bridges are made higher and wider. 3. 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. 4. 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.

### Email address

[REDACTED]

### Screen Name

[REDACTED]



**From:** [REDACTED]  
**Sent:** Fri, 9 Oct 2020 17:24:45 +1100  
**To:** Hawkesbury City Council  
**Cc:** [REDACTED]  
**Subject:** [REDACTED] comments - Hawkesbury draft Housing Strategy  
**Attachments:** 201009 Hawkesbury Housing Strategy.pdf

Dear Andrew

Please find attached DPI's comments on the draft Local Housing Strategy, please feel free to give us a call if you have any questions.

Cheers

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

OUT20/12186

Mr Andrew Kearns  
Manager Strategic Planning  
Hawkesbury City Council  
PO Box 146  
WINDSOR NSW 2756

[council@hawkesbury.nsw.gov.au](mailto:council@hawkesbury.nsw.gov.au)

Dear Mr Kearns

### **Draft Hawkesbury Local Housing Strategy**

Thank you for the opportunity to comment on the draft Hawkesbury Local Housing Strategy (draft Strategy).

The [REDACTED] is committed to the protection and growth of agricultural industries, and the land and resources upon which these industries depend.

[REDACTED] has reviewed the draft Strategy and generally supports the strategic direction of the draft Strategy, particularly the review of previously identified investigation areas from the 2011 Hawkesbury Residential Land Strategy, and the intended approach to provide short and mid term housing demand in existing urban and urban release areas.

It is noted that the draft Strategy states that some areas of rural zoned land have been identified locally where rezoning would not jeopardise the productivity of the rural environment (for example McGraths Hill) and that these areas are to be considered further in the rural lands study that is currently being prepared.

Of the strategic directions in the draft Strategy, [REDACTED] is concerned with the direction:

*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.*

[REDACTED] 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.

[REDACTED] 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 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.

[REDACTED]

[REDACTED]

[REDACTED]

While it is noted that the draft Strategy does not specifically state it is proposed to permit these residential development types in rural zones, [REDACTED] requests that either this direction is removed or that the matter be given very careful consideration during development of the rural land strategy.

Should you require clarification on any of the information contained in this response, please contact [REDACTED]

Yours sincerely

[REDACTED]

**From:** [REDACTED]  
**Sent:** 18 Nov 2019 14:46:54 +1100  
**To:** Hawkesbury City Council  
**Subject:** Hawkesbury Local Strategic Planning Statement

Attn: Peter Conroy

Hi,

I am a resident of Hawkesbury Council, living at [REDACTED]  
I have been attending our [REDACTED] in regard to our rates as well as the proposed M9 Orbital Motorway issues.

I am writing this email in regard to councils future planning for our area.

In attending these meetings, it has become clear to me, and other members, that almost all are waiting and wishing for council to look seriously at rezoning.

At a recent meeting, we were made aware of a submission to council regarding the Hawkesbury Local Strategic Planning Statement, and although we are not in this immediate area, I believe as our block is adjacent to already rezoned areas, we can also be considered.

Our area is bounded by the North West Growth Centre at Vineyard and the Gables on the eastern side of Boundary road.

It is clear of flooding, and bushfire areas, and I believe is ideal for rezoning.

Infrastructure is either already in place, or will be, when these areas are developed.

Bus services and trains are already in place, and hospitals, shopping centres and schools are planned for nearby development.

The benefits to council will be enormous with development contributions, and future rates from new residents.

I urge council to consider in any future planning.

Regards

[REDACTED]



**From:** [REDACTED]  
**Sent:** Tue, 22 Sep 2020 13:44:06 +1000  
**To:** Hawkesbury City Council  
**Subject:** Draft Hawkesbury Council Local Housing Strategy

The Manager  
Hawkesbury Council

My name is [REDACTED] and I live at [REDACTED]

I'd like to comment on the Draft Local Housing Strategy.

There have been a few ups and downs since moving to Oakville about 6 years ago. We were lucky that not long after we moved in, property values in the area went up quite a bit, but then the M9 Orbital road was proposed through our property, which has smashed our property values. We were promised by Minister Perrrotet that the road would be re-routed, and never go through our property, but the web site still shows it. This would make the property very difficult to sell.

We were always living in hope that one day the property would be rezoned and we would be OK when that time came.

The draft Local Housing Strategy shows a few areas in Hawkesbury that are being looked at for future development, but there is little mention of Oakville. I believe that Oakville, which is directly north of the North-West Growth Centre Vineyard stage 2 is an ideal area worth considering. There is about 460ha bounded by Commercial Rd, Glenidol Rd and Hanckel Rds that is unconstrained land with little to no existing agricultural use, being used solely for residential living. It is a natural progression to current development of the Gables and Hills of Carmel and Vineyard stage 2 with infrastructure and transport already in place. The area has only minor 1:100 year flood zones and bush fire zones in this area. Every resident and neighbour we know, would like rezoning, as like us, our home is our superannuation. Council should be supporting our views as rate-payers. Rezoning would give council an enormous boost in development contributions and rates. 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.

I look forward to receiving a favourable response to my submission.

Regards

[REDACTED]



**From:** Your Hawkesbury Your Say  
**Sent:** Tue, 22 Sep 2020 18:01:20 +1000  
**To:** Andrew Kearns;Melissa Barry;Hawkesbury City Council  
**Subject:** Anonymous User completed Exhibition of Draft Hawkesbury Local Housing Strategy Submission

Anonymous User just submitted the survey Exhibition of Draft Hawkesbury Local Housing Strategy Submission with the responses below.

**Name**

[REDACTED]

**Address**

[REDACTED]

**Submission**

TO: THE MANAGER HAWKESBURY COUNCIL My name is [REDACTED] and I live at [REDACTED], I also have property at [REDACTED] and I am a rate payer. I'd like to comment on the Draft Local Housing Strategy. I have lived in Oakville for 20 years and we have seen many changes in the area especially when the M9 Orbital road was proposed through our property, which has now smashed property values. We were promised by Minister Perrottet that the road would be re-routed, and never go through our property, but the web site still shows it and this is causing our family much stress and anxiety. We were always living in hope that one day the property would be rezoned and we would be OK when that time came. The draft Local Housing Strategy shows a few areas in Hawkesbury that are being looked at for future development, but there is little mention of Oakville - WHY????? I believe that Oakville, which is directly North of the North-West Growth Centre Vineyard stage 2 is an ideal area worth considering. Following are a few points that should be noted:- -

Oakville has practical unconstrained land to meet housing targets - Natural progression of development to unconstrained land from the Gables and Hills of Carmel -

The changing dynamic of Oakville – no longer rural - Higher rates with lowering land values - High percentage of elderly residents who have retirement money locked up in the land - The M9 uncertainty should NOT be an excuse not to rezone. If the council can substantiate rezoning then the M9 route can be changed - How can they investigate areas on the western side of the river with no infrastructure (Kurmond/Kurrajong/North Richmond).

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Council should be supporting our views and listen to us as rate-payers! Rezoning would give Council an enormous boost in development contributions and rates and make the Council more liable for the future. 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. I look forward to receiving a favourable response to my submission. [REDACTED]

**Email address**

[REDACTED]

**Screen Name**

[REDACTED]

**From:** [REDACTED]  
**Sent:** Tue, 22 Sep 2020 17:51:08 +1000  
**To:** Hawkesbury City Council  
**Cc:** Hawkesbury Parliament  
**Subject:** Draft Hawkesbury Council Local Housing Strategy

TO: THE MANAGER HAWKESBURY COUNCIL

My name is [REDACTED] and I live at [REDACTED] I also have property at [REDACTED] and I am a rate payer.

I'd like to comment on the Draft Local Housing Strategy.

I have lived in Oakville for 20 years and we have seen many changes in the area especially when the M9 Orbital road was proposed through our property, which has now smashed property values. We were promised by Minister Perrottet that the road would be re-routed, and never go through our property, but the web site still shows it and this is causing our family much stress and anxiety.

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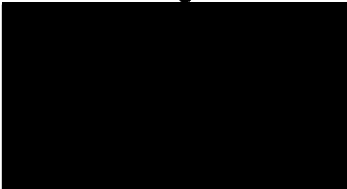
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I look forward to receiving a favourable response to my submission.

Regards



**From:** [REDACTED]  
**Sent:** Tue, 22 Sep 2020 18:11:26 +1000  
**To:** Hawkesbury City Council  
**Cc:** Hawkesbury Parliament  
**Subject:** Draft Hawkesbury Council Local Housing Strategy

TO: THE MANAGER HAWKESBURY COUNCIL

My name is [REDACTED] and I live at 4 [REDACTED]

[REDACTED] I also have property at 1 [REDACTED]

[REDACTED] and I am a rate payer.

I'd like to comment on the Draft Local Housing Strategy.

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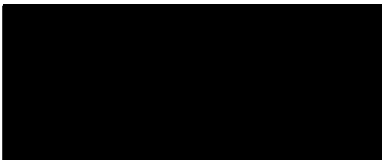
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**From:** Your Hawkesbury Your Say  
**Sent:** Tue, 22 Sep 2020 09:15:51 +1000  
**To:** Andrew Kearns;Melissa Barry;Hawkesbury City Council  
**Subject:** Anonymous User completed Exhibition of Draft Hawkesbury Local Housing Strategy Submission

Anonymous User just submitted the survey Exhibition of Draft Hawkesbury Local Housing Strategy Submission with the responses below.

**Name**

[REDACTED]

**Address**

[REDACTED]

**Submission**

Hi there, I understand the M9 is holding up further investigations to the north of vineyard. At what stage will the Oakville/ Maraylya community have any answers? It's clearly an area that is perfect for development with the box hill development, and most on Boundary rd are frustrated with the building works, the dust, the trucks and the lack of Information on what will happen. Oakville has been no mans land for so many years, nothing has been done with the roads or anything, it's so obviously ready to be bull dozed but has been put in the too hard basket. Our rates have been hiked up, get us some answers! I'm all for oakville getting developed, especially Boundary rd across from box hill.

**Email address**

[REDACTED]

**Screen Name**

[REDACTED]



**From:** [REDACTED]  
**Sent:** Tue, 22 Sep 2020 13:06:52 +1000  
**To:** Hawkesbury City Council  
**Cc:** Hawkesbury Parliament  
**Subject:** Hawkesbury Local Housing Strategy

Good afternoon.

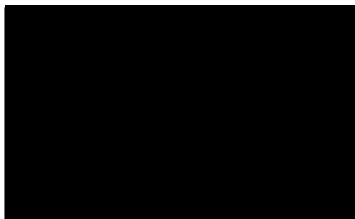
There is quite a lot of who-hah (technical term) on facebook today regarding the housing strategy report and the lack of answers for Oakville / Marayla & Vineyard. It seems the general consensus is that the government has said no M9 orbital through us and that it ends at Richmond Rd. Council are suggesting that they think the orbital is continuing and no further investigations will be done to the north of Vineyard.

I live on Boundary Rd in Oakville. We have had the property since 2007. I am all for development, especially on the other side of Boundary road, considering the infrastructure now going in at Box Hill. I am personally quite sick of paying high rates for very little being done in Oakville. The roads are bad, there are no footpaths to walk, there are intersections that should have been fixed 20 years ago, there are no shops, there are no pedestrian crossings at the schools, there is nothing to be found in Oakville and no plans to make it any better.

I would think that once Box Hill is completely populated and there are shops and a school, what does that do to us on Boundary rd traffic wise? Its already terrible with people coming out of the estates and onto Boundary Rd doing 50km on an 80km road. If our serenity and quiet spot is going to be ruined with traffic and lots of people coming in and out of a shopping centre and school - I'd personally at least like an option of being able to leave, and being able to sell and not lose money because we're de-valued because of a proposed orbital. Whilst council continues talking about freeways and orbitals and no confirmed decisions are made, if we decide to sell – who will buy my property and what price will I get for something that may or may not have a freeway running through it?

So please, give us residents affected by this orbital a proper answer with a definitive report and housing strategy.

Best Regards





**From:** [REDACTED]  
**Sent:** Thu, 8 Oct 2020 16:18:03 +1100  
**To:** Hawkesbury City Council  
**Subject:** FW: Final Draft Housing Plan Submission to Council  
**Attachments:** Submission on LHS 08.10.2020.docx  
**Importance:** High

Best Regards



8<sup>th</sup> October 2020

Hawkesbury City Council  
PO Box 146  
WINDSOR NSW 2756  
[council@hawkesbury.nsw.gov.au](mailto:council@hawkesbury.nsw.gov.au)

Attention: Andrew Kearns – Manager Strategic Planning

Dear Andrew

**RE: Draft Hawkesbury Local Housing Strategy - Oakville Area**

We are the owners of .. [REDACTED] in the suburb of Oakville in the Hawkesbury local government area (LGA). We appreciate the opportunity to provide feedback on the Draft Hawkesbury Local Housing Strategy (LHS), particularly in relation to the provision of additional residential accommodation to meet the needs of our community over the next 25 years. We note our support for the identification of the Oakville area as a potential future residential land release area, particularly given its location near the Box Hill and Vineyard Growth Precincts, as well as existing transport and services.

The suburb of Oakville is located on the eastern boundary of the LGA. It is predominantly zoned RU4 – Primary Production Small Lots and permits a range of small primary industries and associated residential/ supporting uses. However, the suburb does not necessarily provide 'primary agricultural land' like areas of LGA zoned RU1 Primary Production.

Public transport from the area is provided to Riverstone via Maraylya Bus route, with two bus stops located along Boundary Road. The suburb is located 5.5km from Vineyard Train Station and 8km from Riverstone Train Station. The outcome of the public exhibition of the proposed M9 Motorway and Outer Sydney Orbital (OSO) confirms that the OSO corridor will stop at Richmond Road and will no longer go any further north east – either to Vineyard/Windsor Road or onwards to Box Hill/Maraylya. Thus, the Oakville suburb is not impacted by future road reservation requirements

Like most areas in the LGA, land in 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 necessarily preclude Council considering this area for its suitability to accommodate additional residential accommodation. In particular, only broad mapping is currently available in relation to potential threatened species in the area and further detailed investigations of the precise constraints is required. There may be an opportunity to accommodate a biodiversity offset scheme should the area be found to be suitable for additional residential development.

Oakville shares a common boundary with the suburb of Box Hill and is located approximately 2km from the Box Hill Growth Centre Precinct. This Precinct forms part of the North West Growth Centre which also includes the Vineyard land release precinct (see figure at **Appendix A**). Oakville represents a natural extension of the Growth Centre release area. Despite the potential environmental constraints impacting the Oakville area, it represents a logical extension of the Growth Centre release areas – due to its proximity to existing centres, transport and services – particularly when compared to other locations in the LGA.

This is consistent with the Strategic Directions and Actions set out in the Draft LHS which seek to 'maintain a long term supply of residential land'. The LHS highlights the importance of early identification of future urban areas to 'allow adequate time for planning and infrastructure delivery'. The LHS identifies the area to the 'north of Vineyard Stage 1 and 2 areas' as a potential investigation area subject to the finalisation of OSO. As detailed above, the route for the OSO has now been finalised and the area north of Vineyard Stages 1 and 2 is not impacted by any road corridor requirements.

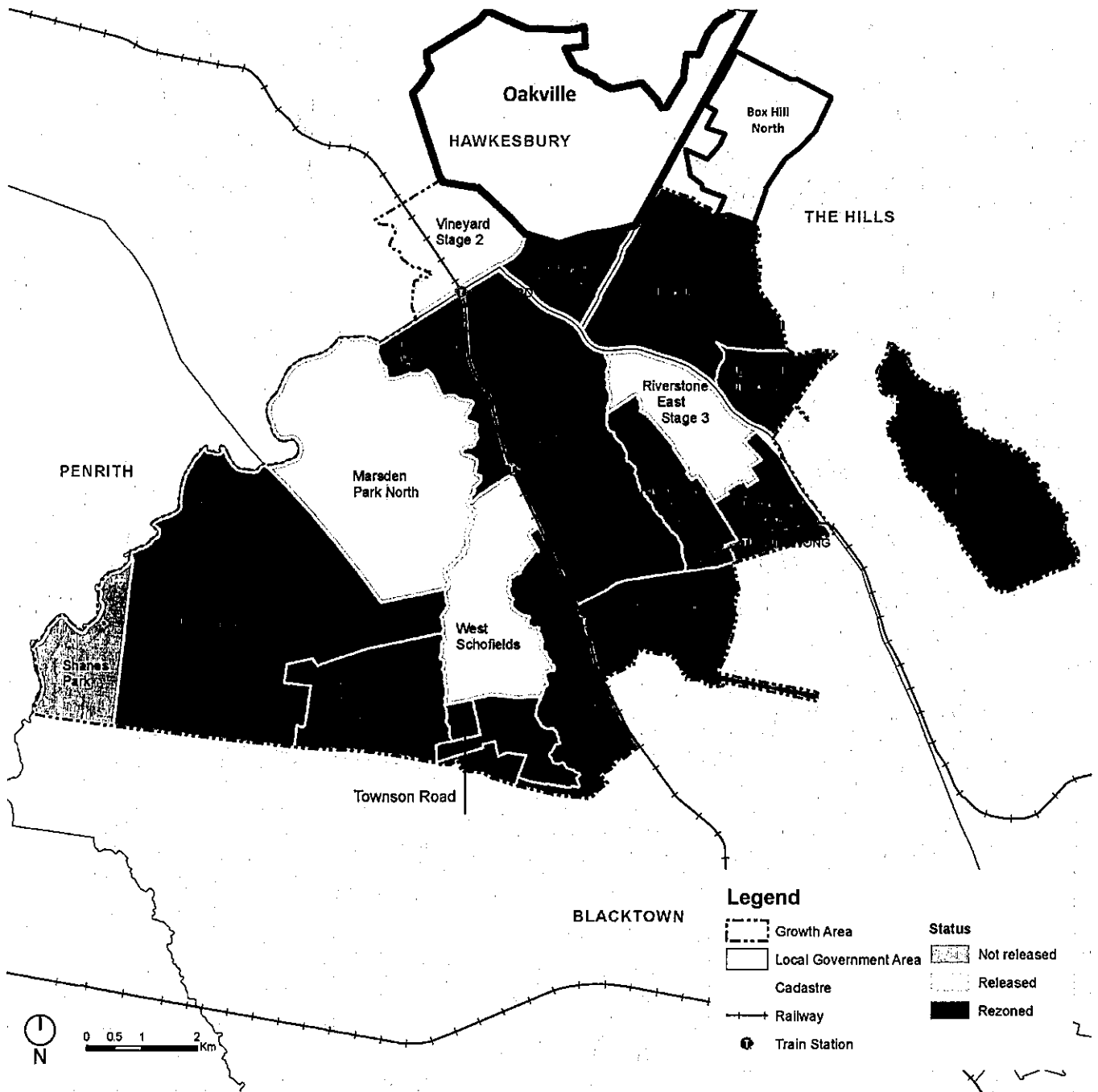
The LHS recommends that Council undertake environmental investigations of these area to determine future development potential. We strongly support this action and encourage Council to undertake investigations into the potential for the Oakville area (or parts of it) to be released for additional residential accommodation to meet the needs of the community. The landowners in the Oakville area would like to work collaboratively with Council and State Government to undertake further investigation and stakeholder consultation as part of the consideration of this area as a future land release.

Thank you for considering this submission. Please contact me on ... [REDACTED] .. with any queries.

Regards

[REDACTED]

#### **Appendix A – North West Growth Area in relation to Oakville**



**From:** [REDACTED]  
**Sent:** Tue, 22 Sep 2020 18:06:05 +1000  
**To:** Hawkesbury Parliament;Hawkesbury City Council  
**Subject:** TO: THE MANAGER HAWKESBURY COUNCIL

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Regards



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**Sent:** Tue, 22 Sep 2020 14:52:08 +1000  
**To:** Hawkesbury City Council  
**Cc:** Hawkesbury Parliament  
**Subject:** Draft Hawkesbury Council Local Housing Strategy

TO: THE MANAGER HAWKESBURY COUNCIL

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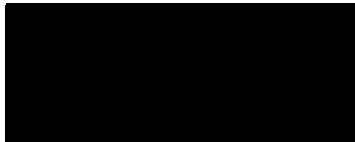
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Virus-free. [www.avast.com](http://www.avast.com)