



Mr Tommaso Briscese
General Manager
Burwood Council
PO Box 240
BURWOOD NSW 1805

Dear Mr Briscese

Burwood Local Housing Strategy

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

The Department commends Council on preparing a robust evidence base to support its LHS, providing an overall understanding of the housing needs, challenges and opportunities of the Burwood local government area and a strong commitment to strategic planning.

I can confirm that I have determined to approve Burwood Council's Local Housing Strategy adopted by Council in February 2020. My decision reflects the analysis undertaken to develop a comprehensive strategic plan and an evidence base to inform your LHS and ensure you deliver more than 2,030 dwellings for the period 2021-26 and begin to provide a great opportunity to reach the 10+ year housing target.

In doing so, I have determined that:

1. The LHS partially addresses housing supply, including the 6-10 year housing target, to be delivered predominantly through the current pipeline and existing capacity under existing controls in the Burwood Town centre.
2. The LHS addresses the need for housing diversity by proposing to investigate opportunities to review existing R3 Medium Density Residential Zones with a view to introducing additional housing typologies and amending height, density and minimum lot size controls. Further actions for delivery are required.
3. The LHS partially addresses housing affordability through Council's intention to rely on SEPP 70 to secure affordable housing through future rezoning proposals within the PRCUTS and Burwood North Metro Precinct and a commitment to investigate a density bonus where affordable housing is provided by proponent led planning proposals. Further actions are required.
4. The LHS is generally consistent with Section 9.1 Directions and SEPPs.
5. The LHS provides a high-level consistency with the Eastern City District Plan, subject to the requirements identified below and demonstrating good alignment with the Burwood LSPS.

My approval is subject to the following requirements:

1. Council is to prepare an updated and prioritised Implementation and Delivery Plan that clearly articulates the actions, roles and responsibilities and timing to facilitate housing supply, diversity and affordability between 2021 and 2026 and beyond. The Plan should be prepared in consultation with DPIE, TfNSW, Strathfield, City of Canada Bay and Inner West Councils to ensure any interdependencies and cross boundary issues are satisfactorily resolved. The Plan is to be submitted to the Department for approval within six months of Council being notified of the LHS approval.
2. Council is to provide the Department with anticipated development take-up analysis for existing areas and provide further information on the timing, possible dwellings and expected locations of growth particularly for the 6-10 year period. This analysis is requested to clarify and substantiate the LHS's commitment to a 6-10 year target of 2,030 dwellings plus any shortfall arising from the 0-5 year period. This should ideally be provided in the Implementation and Delivery Plan.
3. Review and revise the LHS Actions for housing diversity and housing affordability to clearly articulate the objectives and expected outcomes. In particular, Council is to review existing R3 Medium Residential Zones to increase housing diversity and provide a copy of the feasibility study to DPIE. In doing so, Council is to establish suitable approaches to encourage and support seniors housing, student housing, key worker housing and group homes. Future changes to LEP and/or DCP to achieve the identified approaches should also be identified. This should ideally be provided in the Implementation and Delivery Plan.
4. Council is to prepare and commence any planning proposals that are required to facilitate housing diversity outcomes within six months of this approval being granted by the Department. Council is encouraged to actively engage with the Department and other State agencies particularly in relation to Burwood Town Centre, opportunity sites along the railway corridor, local centres (Enfield, Croydon Park and Croydon) and land with park frontages.
5. Council is to expedite the Burwood Town Centre Masterplan, and alternatively progress PRCUTS and Burwood North, to determine future implementation mechanisms including any necessary planning proposals and their timing. If Council progresses Burwood Town Centre (as a key source of housing growth for the 6 –10 year period), it is recommended that the Town Centre Masterplan be completed by March 2022 or a planning proposal for PRCUTS be submitted to DPIE for Gateway Determination by March 2022.
6. Council is to develop a plan for engaging with adjoining councils and State agencies such as TfNSW.
7. Council should work with Strathfield Council in relation to housing growth of around 250 dwellings in Strathfield Town Centre.
8. Future iterations of the LHS to articulate a zoning/centres hierarchy and function description of each centre to provide a framework that prioritises growth and signals to all stakeholders where and when growth and investment is proposed to occur. Planning for medium- and long-term housing growth should be subject to the preparation of a Local Centres Strategy that addresses the ECDP's Principles for Local Centres (page 49, ECDP).

9. Future iterations of the LHS be informed by a detailed land use opportunities and constraints analysis and mapping to confirm medium- and long-term housing opportunities. This analysis should:
 - a) be contextualised having regard to the GSRP, ECDP, the Burwood LSPS (including any updates), Future Transport 2056, delivered infrastructure reinvestments and the outcomes of the PCRUTS traffic and transport analysis;
 - b) consider the implications that Burwood's strategic centre designation could have for housing and the need to balance employment function and jobs growth with housing needs;
 - c) be undertaken in collaboration with relevant stakeholders, including TfNSW, Strathfield, City of Canada Bay and Inner West Councils;
 - d) consider the implications of the 2019 Population Projections for the LGA;
 - e) provide broader detailed demonstration of the achievement of housing diversity, including details of provision for multiple dwellings and dual occupancy.
 - f) clearly articulate existing and future opportunities and constraints as either manageable or insurmountable; and
 - g) proactively identify State Government-owned sites that may be suitable for redevelopment, and particularly deliver affordable housing outcomes (in consultation with the identified landowners).
10. Future iterations of the LHS should outline the key local and state infrastructure commitments and investment decisions that will support the unlocking of housing supply. This analysis should consider public and active transport, education and health facilities, open space, community infrastructure and utility services. Council is encouraged to cross reference any endorsed Council strategies and plans, where relevant. Thresholds/triggers, funding, responsibilities for delivery and indicative timeframes should also be identified in future iterations of the LHS. This may also include an updated S7.11 Contributions Plan.
11. Council is to monitor and review the supply and delivery of housing, in particular, to track its performance against the 6-10 year housing target and the housing diversity and affordability outcomes delivered. A monitoring and review system will ensure that appropriate mechanisms can be identified and implemented to meet Burwood's housing needs. DPIE will liaise and work with Council on this requirement.
12. Council is to prepare an Affordable Housing Policy, and if feasible include a Contribution Scheme in accordance with the Department's Guideline for Developing an Affordable Housing Contribution Scheme that commits Council to examining the feasibility of levying affordable housing contributions for any new planning proposals that would result in development uplift or an increase in land value. This should be included to inform the next LSPS and LHS. When preparing the Scheme, Council is to demonstrate:
 - a) it has considered all mechanisms and locations that may be available to secure affordable housing; and
 - b) in consultation with relevant stakeholders, State Government-owned sites capable of contributing to long-term social and affordable housing demand are identified.

13. Council is to update or revise the Local Housing Strategy to inform its Local Strategic Planning Statement following the making of a future District Plan.
14. The direction and strategic planning approaches endorsed in State-led precinct plans are to prevail in the event of any inconsistency with this approval and/or the Council's LHS (as revised and current).

Implementing your Local Housing Strategy

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

To meet these commitments, a detailed Implementation, Delivery and Monitoring Plan (as outlined above) that shows clear commitments, timeframes for actions, key risks and mitigation measures is required within four months of this approval. This should also reflect a comprehensive work program for all strategic planning work Council commits to undertake to implement its LHS.

Local Housing Strategy Reviews and Updates

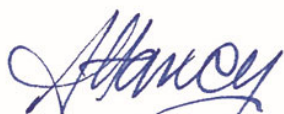
We strongly recommend that Council review and revise (where required) its LHS before the Local Strategic Planning Statement (LSPS) is required to be reviewed by the Greater Sydney Commission. This will help best inform the next update to the LSPS. In this respect, we recommend that an updated LHS, that addresses the requirements be submitted to me within 12 months.

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

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

Should you have any further questions, please do not hesitate to contact me on 9274-6563, or alternatively contact Jenny Rudolph on 02 8275-1030.

Yours sincerely



Amanda Harvey
Executive Director
Local Strategies and Plan Making

31 May 2021

Encl: Advisory Notes



Burwood Council Local Housing Strategy

Advisory Notes

The following advisory notes identify the further work Council will need to undertake to strongly position future planning proposals and further iterations of the Local Housing Strategy. The advisory notes provide specific guidance on matters that Council is encouraged to consider when next updating the LHS. The Department will expect these same matters to be addressed in planning proposals and will be reinforcing them through Gateway determinations as an interim measure until the LHS is further updated in accordance with the approval requirements and these notes.

| Matter | Consideration for future LHS updates and preparation and assessment of planning proposals |
|----------------|--|
| General | |
| Implementation | <p>LHS should be underpinned by an implementation Plan with a priority work program, clearly defined roles, responsibilities and definitive timeframes with risks and dependencies identified. This is encouraged to be informed by resourcing and budgets to demonstrate how housing targets will be delivered.</p> <p>The implementation plan should specifically address:</p> <ul style="list-style-type: none"> • Actions to achieve the housing targets and housing diversity, the location, the number of dwellings and time period (in years) • Likely take up rates for housing diversity • The implementation of a monitoring review system and establish housing targets for medium density and seniors housing to determine whether future changes to the LEP and/or DCP are required to incentivise or encourage housing diversity and diversity of housing typologies. • Housing opportunities in strategic and local centres, and proposed planning proposals to achieve the outcomes • The delivery of the housing opportunities presented by the PRCUTS and the Burwood North Metro Station precinct, including implementation mechanisms. • Analysis of land use opportunities and constraints for other longer term opportunities • Proactive management and outline the planning proposal, particularly where Council will secure diversity and affordability outcomes, including in particular, support key cohorts such as seniors housing, key worker housing, |



| Matter | Consideration for future LHS updates and preparation and assessment of planning proposals |
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| | affordable housing and other typologies that suit the changing needs of existing and future households in identified growth precincts. |
| Review and monitoring framework | <ul style="list-style-type: none"> • Revisions to the LHS may be required in response to significant changes in the LGA such as announcements on new infrastructure investment and employment opportunities, significant changes in projected population growth or updates to the LSPS. • The framework should also review the supply and delivery of housing, including the 6-10 year housing target and targets greater housing diversity, including for dual occupancy, medium density, seniors housing and affordable housing. |
| Making appropriate provision for any additional housing opportunities that may arise out of sequence | <p>The inclusion of a transparent and robust framework to consider additional opportunities will assist Council, the Department and other relevant agencies to assess proposals that are inconsistent with the LHS. It will also ensure that changes to land use or development controls do not take place without demonstrating strong strategic merit. Council is encouraged to develop a framework within which to consider such proposals, including but not limited to:</p> <ul style="list-style-type: none"> • Strategic merit and case for change • Robust demographic evidence • Demand analysis and economic impacts • Infrastructure delivery and funding to be borne by the proponent • Stakeholder consultation and outcomes • Sustainability and resilience • Social and affordable housing contribution |
| Community and Stakeholder Engagement | <ul style="list-style-type: none"> • Outline and incorporate findings of exhibition of LHS as well as relevant community and stakeholder engagement. |
| Implementation and strategic alignment | <p>Council is encouraged to:-</p> <ul style="list-style-type: none"> • Strengthening the strategic framework; • Address DPIE's draft local character policy and an approach to the Medium Density Housing Code; • Demonstrate good alignment with elements of the PRCUTS in relation to affordable housing provision, sequencing of growth and infrastructure coordination • Considering out of sequence planning proposals and urban renewal opportunities • provide a strong, forward looking evidence-based analysis of opportunities and constraints, particularly for longer term growth; |



| Matter | Consideration for future LHS updates and preparation and assessment of planning proposals |
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| | <ul style="list-style-type: none"> clearly articulate the infrastructure demand analysis and funding mechanisms required to support future growth; clearly articulate the details, outcomes and timeframes for the diversity and affordability initiatives. |
| Consultation and engagement with agencies | <p>Council is to continue consultation and collaboration with the following agencies:</p> <ul style="list-style-type: none"> Work with DPIE to determine delivery of the housing opportunities presented by the PRCUTS and the Burwood North Metro Station precinct, including implementation mechanisms. Collaborate with TfNSW to address and resolve the feedback provided by TfNSW in response to the draft LHS DPIE Policy in relation to progressing any planning proposal for Local Character Areas, especially the heritage areas and how additional dwellings or renewal may occur. Ongoing consultation and collaboration with community housing providers to support the delivery of affordable housing. Council work with Strathfield Council in relation to housing growth of around Strathfield Town Centre |
| Interdependencies with relevant local evidence base | <p>Incorporate the findings and outcomes of latest studies, policies and State-led precinct plans prepared since the publication and release of the LHS.</p> |
| Consultation with INSW | <p>Consultation between Council and SINSW should occur:</p> <ul style="list-style-type: none"> Prior to the finalisation of any future strategy or planning proposal that proposes a significant increase in the number of dwellings; and When Council is aware of variations in the following: <ul style="list-style-type: none"> The actual number of lots or dwellings varying from planning proposal estimates/ strategic plans. An emerging demographic that varies from the planned population profile, either with more or less families with children. Rates of development and dwelling take-up varying from planned release programs or forecast residential take-up rates. <p>This is to ensure SINSW specifically understands where growth, or changes to growth rates are occurring and can effectively respond by targeting appropriate resourcing to impacted Government schools.</p> |
| Data | |
| Clarification of 6 to 10 year and 10-20 year housing target | <ul style="list-style-type: none"> Revisions to the LHS should provide a breakdown of how the 6 to 10 year target will be achieved, including when and where anticipated supply will be delivered and explain market take up rates. |



| Matter | Consideration for future LHS updates and preparation and assessment of planning proposals |
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| | <ul style="list-style-type: none"> • Council should ensure that all population and dwelling forecasts are cross-checked against published DPIE projections to provide greater transparency. Additional guidance and support can be arranged with the Department’s Evidence and Insights division to resolve any variations in dwelling forecasts. • Provide additional analysis information relating to the affordability issues focusing on high costs of acquisition for CHPs, income groups or change in income groups over time, tenure or change over time; rental stress or change over time, change in availability of affordable private rental so to inform an ASHP. |
| Dwelling Diversity | |
| Affordable Housing Contribution Scheme | <ul style="list-style-type: none"> • Council’s LHS evidence base is considered sufficient to justify the preparation of a Affordable Housing Policy and SEPP70 affordable housing contribution scheme. An LHS condition of approval is included for Council to prepare a scheme that sets out delivery and rent models, tenant eligibility criteria, tenancy allocation, asset ownership and management. |
| Medium term housing | |
| Updated LHS should include a detailed and robust analysis | <p>LHS should also include an analysis:</p> <ul style="list-style-type: none"> • be contextualised having regard to the GSRP, ECDP, the Burwood LSPS (including any updates), Future Transport 2056, delivered infrastructure reinvestments and the outcomes of the PCRUTS traffic and transport analysis; • consider the implications that Burwood’s strategic centre designation could have for housing and the need to balance employment function and jobs growth with housing needs; • be undertaken in collaboration with relevant stakeholders, including TfNSW, Strathfield, City of Canada Bay and Inner West Councils; • consider the implications of the 2019 Population Projections for the LGA; • Broader detailed demonstration of the achievement of housing diversity, including details of provision for multiple dwellings and dual occupancy; • clearly articulate existing and future opportunities and constraints as either manageable or insurmountable; • proactively identify State Government owned sites that may be suitable for redevelopment, and particularly deliver affordable housing outcomes (in consultation with the identified landowners); • the key local and State infrastructure commitments and investment decisions that will support the unlocking of housing supply; and • Infrastructure planning needs supported by relevant technical studies to support the 10+ year forecast housing need. |