

Outcome of Exhibition

Local Strategic Planning Statement (LSPS) Planning Proposal Report on Submissions

August 2020

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2. Executive Summary

The purpose of this report is to provide a summary of submissions received during the exhibition of the Local Strategic Planning Statement (LSPS) planning proposal.

The planning proposal, with appendices and attachments, was publicly exhibited on the Department of Planning, Industry and Environment's Planning Portal for 28 days from 1 June 2020 to 28 June 2020 in accordance with the requirements of the *COVID-19 Legislation Amendment (Emergency Measures) Bill 2020*.

The planning proposal was also publicly exhibited for 8 weeks from 1 June 2020 to 27 July 2020 in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* (the EP&A Act).

The planning proposal was publicly exhibited on Council's website and community engagement platform *Collaborate*. Notifications were also placed in Council's *City of Canada Bay News* (June 2020 edition) and on the following social media platforms:

- Instagram (13 and 17 July 2020)
- Facebook (7 and 21 July 2020)
- Council's holding messages, which play when people phone Council and are placed on hold.

Public authorities and adjoining Councils were also notified.

A total of 54 submissions were received during the exhibition period. The primary issues relate to:

- Environmentally Sensitive Land
- Increased density in North Strathfield
- Affordable Housing Contribution Scheme
- Minimum Lot Size and street frontage for boarding houses in R2 zone

The report provides a summary and a response to submissions.

3. Introduction

The LSPS planning proposal

The planning proposal has been prepared in accordance with Section 3.33 of the Environmental Planning and Assessment Act 1979 (EP&A Act) and addresses the requirements cl 3.8 (3) of the EP&A Act 'on the preparation of planning proposals under section 3.33 to give effect to the district strategic plan'.

The planning proposal is seeking to achieve the following outcomes:

- New developments deliver an expanded range of apartment sizes.
- New developments deliver a proportion of dwellings that are affordable to medium, low, and very low income families.
- Boarding houses are limited to only areas where there is good amenity.
- New developments that are impacted by aircraft noise are designed to ameliorate the impacts.
- Environmentally sensitive land is protected from development impacts.
- HOB and FSR objectives reduce ambiguity when applying Clause 4.6 of the LEP.
- Sydney Water sites are zoned to reflect their operational purposes.
- Errors and inconsistencies are corrected to improve legibility and accuracy.

4. Consultation Strategy

The planning proposal was publicly exhibited for 8 weeks, from 1 June 2020 to 27 July 2020, in accordance with the EP&A Act.

A. Previous community consultation

The planning proposal is the first in a series of planning proposals that will deliver the City of Canada Bay LSPS. The LSPS was informed by an extensive community engagement program, which built on earlier consultation that informed the preparation of the Community Strategic Plan.

An online survey gathered and distilled key insights on a comprehensive range of issues and notifications of the survey were sent to all households and businesses in the LGA. There was a significant level of engagement, which directly informed the final LSPS.

B. Recent changes to notification requirements

On 24 March 2020, the NSW Government introduced the *COVID-19 Legislation Amendment (Emergency Measures) Bill 2020* which makes temporary changes to the EP&A Act. The Bill temporarily removes the requirement for Councils to display physical copies of some documents, including planning proposals. However, documents are instead to be made available on the NSW planning portal. The planning proposal was exhibited on the NSW planning portal for the required 28 days, from 1 June 2020 to 28 June 2020.

On 17 April 2020, the NSW Government also amended the EP&A Regulation to permanently remove the requirement that Councils advertise public notifications in a local newspaper. Notifications are instead to be placed on Council's website and by such other manner that Council considers necessary to bring it to the notice of the local community or other interested persons. This measure was in response to many local newspapers having either closed or transitioned to on-line only delivery platforms, often with a paywall. The Inner West Courier has recently moved to online only. Council has proactively introduced the monthly *City of Canada Bay News* to address the lack of physical notifications.

C. Advertisement on Council's Website

Council's Collaborate webpage provided notification of the planning proposal, contextual information and a vehicle for the community to make submissions throughout the exhibition.

D. Articles in Council's newsletter and eNewsletters

Council ran an article in the June edition of Council's new printed *City of Canada Bay News*, which were physically distributed to all households.

E. Social media

Council uploaded posts to the following social media platforms:

Notifications were also placed on:

- Instagram (13 and 17 July 2020)
- Facebook (7 and 21 July 2020)
- Council's holding messages, which play when people phone Council and are placed on hold.

F. Public Authorities

Exhibition notification emails and a link to the Collaborate webpage was required by the Gateway conditions to be sent to the following public authorities and Councils:

- Sydney Metro
- Greater Sydney Commission
- Office of Environment and Heritage
- NSW Environment Protection Authority

- NSW Office of Water
- Sydney Water
- Sydney Metro
- Sydney Airport Corporation
- Transport for NSW – Roads and Maritime
- Strathfield Council
- Burwood Council
- Cumberland City Council
- City of Ryde

5. Review of submissions

This section of the report provides responses to key matters raised in submissions received during the exhibition period.

54 submissions were received:

- 46 individual written submissions from 44 members of the general public, comprising:
 - 36 petition letter submissions from individuals belong to a resident group;
 - 1 individual submission representing a different resident group;
 - 9 other submissions from 8 individuals.
- 6 submissions from Government agencies and adjoining local Councils.
- 1 submission from a non-Government agency, a Community Housing Provider.
- 1 submission from a development industry peak body.

Comments are provided here in response to key matters raised under the headings below:

5.1 Environmentally Sensitive Land (ESL)

5.2 Increased density in North Strathfield

Part 6 of this report includes a summary of all submissions and a response to any matters that do not fall within the above categories.

5.1 Environmentally Sensitive Land (ESL)

A submission was received from Schools Infrastructure NSW that raised concerns about the Environmentally Sensitive Land layer proposed on Department of Education land at Russell Lea Public School, Rivendell School, and Mortlake Public School.

Where the ESL is applied future development must ensure that impacts on the natural environment are minimised and where possible avoided. In particular, future development is unable to be undertaken as Complying Development.

This ESL is intended to protect threatened and endangered species of High Management Priority (Sydney Turpentine-Ironbark Forest). Lodgement of a development application provides Council with the opportunity to review the impacts of new development on identified endangered ecological communities.

To ensure that minor work to schools is not unduly impacted by further regulatory burden, it is recommended that the ESL maps be amended to remove the ESL layer from school land that is occupied by buildings. This outcome would facilitate the efficient maintenance of our local schools whilst also protecting the environmental attributes on school land (refer to [6. Appendix C - Environmentally Sensitive Land \(ESL\) maps - Proposed](#)).

5.2 Increased density in North Strathfield

A petition letter submission was received from 39 landowners/residents representing North Strathfield Residents Group. The submissions request that land on the western side of the railway line in North Strathfield be rezoned at the same time as the Stage 1 areas of PRCUTS given the availability of infrastructure in the area. The submission does not address issues pertaining to the exhibited planning proposal as the planning proposal does not propose the rezoning of land within North Strathfield.

A submission was also received from an individual representing Save North Strathfield Residents Action Group, which supports the current and proposed Land Zoning Maps and retention of R2 Low Density Residential zone for North Strathfield. It is argued that the retention of this zone would protect the current character of the area. The submission also supports medium density housing (town houses and duplexes) within the R2 Low Density Residential zone, on the premise that the zoning remains as low density.

The Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) requires Council to implement the strategy in stages. This is to ensure that future residential development is aligned with the delivery of new supporting infrastructure.

Council is working with the Department of Planning, Industry and Environment and Transport for NSW to prepare a precinct wide traffic/transport study for the initial stage identified in PRCUTS. The study is required to be completed before the rezoning of land within the corridor in order to ensure that the traffic network is able to support the proposed increases in density. Should the traffic study demonstrate that there is capacity to accommodate the proposed increase in dwelling numbers, a planning proposal will be prepared to rezone land generally in accordance with PRCUTS.

Council will undertake a separate investigation in relation to the land use opportunities and implications arising from Sydney Metro West.

The issues raised in the submissions are not relevant to the exhibited Planning Proposal.

The community in North Strathfield will be provided with an opportunity to provide feedback on the desired future character of the land when engagement is undertaken on a local character statement for land within the vicinity of Metro stations and when Stage 2 of the Parramatta Road Strategy is progressed.

5.3 Affordable Housing Contribution Scheme

A submission was received from Bridge Housing, which supports Council's proposed introduction of an AHCS, particularly in view of the lack of affordable housing, including housing diversity, within the LGA. The submission notes that the proposed 4-5% contribution requirement is below the level of affordable housing estimated by the Community Housing Industry Association (CHIA) NSW to meet unmet demand. The submission recommends Council investigate a range of additional mechanisms to deliver affordable housing, including a staggered increase in contribution rate over the next 5 years to bring it into line with the GSC recommended rate of 10%. The Community Housing Provider notes that other Councils have adopted this approach.

Comment: Council intends to investigate all possible mechanisms to deliver affordable housing as part of an intended evidence-based review of the CCBC Affordable Housing Policy, to maximise the delivery of affordable housing that addresses the needs of the community and that is financially sustainable.

A submission was also received from the Property Council of Australia, which objects to Council's proposed introduction of an AHCS due to concerns that:

- whilst the proposed contribution rates are consistent with the Greater Sydney Regional Plan, the cumulative impact of the proposed rates plus other contributions (7.11, SIC, VPAs) will add significant costs to the development of housing in the area;

Comment: The Greater Sydney Region Plan, *A Metropolis of Three Cities*, recommends that Affordable Rental Housing Targets be implemented to deliver an additional supply of affordable housing for very low to low-income households in Greater Sydney. The Plan identifies key parameters for successful implementation of Affordable Rental Housing Targets through research, testing and engagement with stakeholders. The parameters include consideration of other government development charges for essential local and state infrastructure, so that communities do not forgo local amenity and services, from Section 7.11 development contributions, Special Infrastructure Contributions and voluntary planning agreements. The Plan further states that targets generally in the range of 5-10 per cent of new residential floor space are viable.

Council's viability testing including an assumption that other contributions would be required to be paid in order to determine the capacity of development to pay.

- the viability testing indicates that the scheme is not economically viable in some cases, unless contributions are deferred / paid as physical dwellings, rather than paid as cash up front; and

Comment: Council tested a range of contribution rates that ranged between 5% and 10%. The testing revealed that rates at the higher end of the range were not viable, leaving limited opportunity for affordable housing contributions. For some sites, a higher percentage was found to be viable if paid, in kind (dwellings), instead of a monetary contribution.

Council's viability testing acknowledges that developers often prefer cash contributions over in-kind contributions (i.e. contribution of completed dwellings on-site), but that contributions paid in-kind are more valuable than a monetary contribution taken at Construction Certificate stage because they yield the highest number of affordable units.

Contributions paid in-kind are also assisted by the effects of discounting because they do not require an upfront payment, merely that sales revenue of a proportion of units is foregone, i.e. they are constructed but do not generate a revenue. However, dwellings paid in-kind will incur strata fees ongoing, which can counter the affordability for whom the in-kind properties are dedicated (ie. Council or the Community Housing Provider nominated by Council). The testing recommended the dedication of dwellings in-kind are likely to be Council's preferred mechanism, even though all the recommended contribution rates are feasible if paid as cash.

- the Covid-19 pandemic economic shock has created uncertainty over the State's economy and for the residential development industry. Council is urged to defer the proposed scheme until there is greater certainty.

Comment: The draft Affordable Housing Contribution Scheme seeks an affordable housing contribution only in localities that are experiencing a density uplift. With large sectors of the general community experiencing Covid-19-induced financial and housing stress, it is even more imperative that government deliver affordable housing in appropriate circumstances where shown to be financially viable.

An individual submission was also received that supported the proposed AHCS, but mentioned that it would be good to know Council's aspirational Affordable Housing targets, beyond what is financially feasible.

Comment: This will be further considered as part of an upcoming review of Council's Affordable Housing Policy.

It is recommended that the draft Affordable Housing Contribution Scheme remain unchanged.

Council has the opportunity to review the affordable housing contribution scheme over time as demands for housing change.

It should be noted that Council received two requests for extension of time to make a submission from developers, which Council was unable to accommodate due to the requirements to finalise the LEP by 31 August 2020.

5.4 Minimum Lot Size and street frontage for boarding houses in R2 zone

A submission was received from the Property Council of Australia, which objects to the proposed introduction of a minimum lot size and street frontage for boarding houses in R2 zone. The submission states that the Affordable Rental Housing SEPP already provides adequate controls over boarding houses in low density zones.

Council's intention is to protect the amenity of low density residential zones by ensuring that the built form and character of new boarding houses are restricted to larger lots in the zone. There is also evidence that boarding houses within the LGA are generally not delivering affordable housing.

Whilst there are some provisions that guide the scale of boarding house development under the Affordable Rental Housing SEPP, Council is able to complement these requirements to cater for local circumstances.

The Department of Planning, Industry and Environment is also currently proposing a new State Environmental Planning Policy (Housing Diversity) 2020 (Housing Diversity SEPP). The new SEPP will consolidate the three existing housing SEPPs ((Affordable Rental Housing SEPP; Housing for Seniors and People with a Disability SEPP; and Affordable Housing (Revised Schemes) (SEPP 70). The draft SEPP proposes to:

- remove the requirement for boarding houses to be mandated within the R2 – Low Density Residential zone;
- amend the floor space ratio (FSR) bonus for boarding house development to a standard 20%; and
- include a requirement for affordability of boarding house developments.

It is Council's intention to facilitate a diversity of apartments sizes and types by increasing the supply of studio and one-bedroom apartments (and three-bedroom apartments) in more appropriate locations (Refer to section 1 of the planning proposal – Diversity of apartment sizes) and by introducing a requirement for affordable housing.

6. Submissions

This section of the report provides a summary of all submissions received during the exhibition period and a response to any matters raised in submissions that are not addressed in Section 5 above.

Submissions below are organised in alphabetical order (last names) of the individual owner / resident making the submission. The names of individuals who have made a submission have been redacted.

6.1 Summary of a petition letter submission

A petition letter submission was provided by 36 land owners / residents belonging to North Strathfield Residents Group. Key issues raised were:

1. North Strathfield residents have been living with uncertainty regarding upzoning of the area since 2013.
2. Urbanisation of the area makes sense.
3. Council is requested to bring forward North Strathfield into Stage 1 of PRCUTS, as the area is already well serviced by infrastructure.
4. Council is urged to provide transparency for timing of the traffic study and to expedite it.
5. **Attachment:** This is a duplicate of Petition Letter Number 1 submitted for the exhibition of the LSPS and the Local Housing Strategy in September 2019, which raised the following:
 - a. The land bounded by Conway Avenue, George Street, Allen Street and Powells Creek in North Strathfield is suitable to be rezoned to R4 High Density Residential;
 - b. Identification of the land in the LSPS as 'terrace and dual occupancy potential' is uncharacteristic of surrounding development;
 - c. Amending the draft LSPS and draft Housing Strategy to identify the North Strathfield Precinct as an appropriate location for R4 High Density Residential development.

A response to the above can be found in section 5.2 of this report.

6.2 All submissions

No.	Author	Summary of submission	Review and comment
1	City of Ryde Council	The City of Ryde Council has no objection to the planning proposal.	No action required.
2	Greater Sydney Commission	The GSC raises no issues with the planning proposal and provides no comments about it.	No action required.
3	Individual	The submission comprises only the Attachment to Petition Letter - North Strathfield Residents Group . The Attachment is a duplicate of Petition Letter (Proforma) Number 1 submitted for the exhibition of the LSPS and the Local Housing Strategy in September 2019. Refer to section 6.1 above.	<p>The submission does not address content of the planning proposal. No action required.</p> <p>On 23 June 2020, Council advised the correspondent by email that, as their submission related to a previous exhibition which had since closed, it could not be addressed as part of the exhibition for this planning proposal. They were advised to consider making a new submission that addressed the planning proposal.</p>
4	Individual	The submission comprises only the Attachment to Proforma - North Strathfield Residents Group . The Attachment is a duplicate of Petition Letter (Proforma) Number 1 submitted for the exhibition of the LSPS and the Local Housing Strategy in September 2019. Refer to section 6.1 above.	<p>The submission does not address the content of this planning proposal. No action required.</p> <p>On 23 June 2020, Council advised the correspondent by email that, as their submission related to a previous exhibition which had since closed, it could not be addressed as part of the exhibition for this planning proposal. They were advised to consider making a new submission that addressed the planning proposal.</p>
5	Environment Energy and Science Group (EES), DPIE	Concerns are raised regarding Figure 8 in the supporting Biodiversity Framework, which shows different locations for threatened and migratory species records within 5 km of Canada Bay to that provided by EES in the submission.	<p>Council's consultant for the Biodiversity Framework has advised that the difference in the appearance of the two maps is due to:</p> <ul style="list-style-type: none"> • Additional inclusion of wetland bird species data from the Parramatta River biodiversity study into the EES map; and • Where the EES map shows one dot for multiple sightings, the

No.	Author	Summary of submission	Review and comment
			<p>maps in the Framework has separated each sighting into a separate dot.</p> <p>Also that the difference between the way the maps present the data does not affect the outcomes of the Biodiversity Framework or the recommendations.</p> <p>No action required.</p>
6	School Infrastructure NSW (SINSW), DoE	<p>1. Concerns are raised regarding the superimposition of the proposed ESL layer on DoE land at:</p> <ul style="list-style-type: none"> • Russell Lea Public School • Rivendell School • Mortlake Public School <p>And the impact this would have on the DoE's capacity to undertake alterations, additions and upgrades to school facilities as exempt or complying development.</p> <p>SINSW has requested that the ESL layer be applied to only land that is environmentally sensitive and not to land where there is existing built form and therefore not environmentally sensitive.</p> <p>2. SINSW requests that any amendments to Schedule 5 that apply to DoE land include only the portion of the site or school that contains elements or fabric of heritage significance.</p> <p>3. SINSW is supportive of proposed amendments.</p> <p>4. SINSW requests that Council review 7.11 or 7.12 Plans to include walking and cycling infrastructure to service any uplift within the LGA.</p>	<p>1. It is recommended that the ESL maps be amended to remove ESL layer from identified DoE land where there is existing built form.</p> <p>2. No amendments to Schedule 5 are proposed for any DoE land.</p> <p>3. Noted.</p> <p>4. Noted and supported.</p>
7	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
8	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
9	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.

No.	Author	Summary of submission	Review and comment
10	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
11	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
12	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
13	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
14	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
15	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
16	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
17	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
18	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
19	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
20	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
21	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
22	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
23	Sydney Water	Sydney Water thanks Council for including the 13 sites that the Agency requested to be changed to SP2 in the planning proposal.	The submission is noted.
24	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
25	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
26	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
27	Individual	The submission comprises: 1. a submission addressed to DPIE, dated 6 June 2020 in response to the EIS Sydney Metro West. The submission largely duplicates	Refer to section 5.2 above.

No.	Author	Summary of submission	Review and comment
		Petition Letter - North Strathfield Residents Group. 2. the Attachment to Petition Letter - North Strathfield Residents Group.	
28	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
29	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
30	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
31	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
32	Individual	The submission comprises: 1. a submission addressed to DPIE, dated 6 June 2020 in response to the EIS Sydney Metro West. The submission largely duplicates Petition Letter - North Strathfield Residents Group. 2. the Attachment to Petition Letter - North Strathfield Residents Group.	Refer to section 5.2 above.
33	Individual (2 of 2)	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
34	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
35	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
36	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
37	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
38	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
39	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
40	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
41	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.

No.	Author	Summary of submission	Review and comment
42	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
43	Individual	Refer to Petition Letter - North Strathfield Residents Group	Refer to section 5.2 above.
44	Property Council of Australia	<p>1. Supports proposal to increase diversity of apartment sizes.</p> <p>2. Notes that at the time of finalising the GSRP and the District Plans, the GSC and DPIE intended that the AH targets would be achieved only on the rezoning uplift and that the existing residential development potential would not be subject to any contribution. But that Council's proposed AHCS would apply to all development on the subject site.</p> <p>3. Concern that, whilst the proposed contribution rates are consistent with the GSRP, the cumulative impact of the proposed rates plus other contributions (7.11, SIC, VPAs) will add significant costs to the development of housing.</p> <p>4. Concern that the viability testing, which has not been provided, indicates that the scheme is not economically viable in some cases, unless contributions are deferred / paid as physical dwellings, rather than paid as cash upfront. The DPIE AH Guideline requires testing of AH contribution rates to ensure proposed rates are viable and will not impact development feasibility and overall housing supply.</p> <p>5. Council is urged to defer the proposed scheme until there is greater certainty over the State's economy and for the residential development industry, given the Covid-19 pandemic economic shock.</p> <p>6. Objection to the proposed introduction of minimum lot size and street frontage for boarding houses in R2 zone, as the AH SEPP already provides adequate controls over boarding houses in low density zones.</p>	<p>1. Noted</p> <p>2. Noted. Whilst Council's Affordable Housing rates have been expressed as a percentage of total Gross Floor Area, these rates could also be expressed as a percentage of additional Gross Floor Area. In circumstances, where many of the precincts that will be the subject of the affordable housing contribution scheme are currently zoned IN1 General Industrial and are proposed to be rezoned to B4 Mixed Use or R4 High Density Residential, expressing rates as a percentage of additional Gross Floor Area is not considered to be a relevant approach.</p> <p>3-5. Refer to section 5.3 above.</p> <p>6. Refer to section 5.4 above.</p> <p>7. Noted</p> <p>8. Noted, that the Property Council supports the changes to the E2 Environmental Conservation zone.</p> <p>9. Noted</p> <p>10. Noted</p>

No.	Author	Summary of submission	Review and comment
		<p>7. Supports the introduction of aircraft noise amelioration requirements, which will ensure an acceptable standard of amenity for future residents.</p> <p>8. Submission supports the proposed zoning changes to land that is a Council or Crown reserve that contains critical habitat.</p> <p>9. Supports the proposed strengthened HOB and FSR objectives as these will result in shorter assessment timeframes for DAs and produce outcomes that are more transparent.</p> <p>10. Supports the proposed rezoning of 13 Sydney Water sites as the changes is in response to a request from the Agency.</p>	
45	Bridge Housing	<p>1. Welcomes the proposed setting of a 4-5% affordable housing (AH) contribution requirement.</p> <p>2. Supports the two preferred contribution options – as either dwellings or monetary equivalent.</p> <p>3. Notes the proposed 5% AH target is below the level of AH estimated by the Community Housing Industry Association (CHIA) NSW to meet unmet demand. The CCBC LGA offers limited housing diversity and few AH options.</p> <p>4. Commends Council on outlining the potential to review the contribution rate for PRCUTS should market conditions change.</p> <p>5. Recommends expanding the scheme to other areas via a VPA process and a staggered increase in contribution rate over the next 5 years to bring it into line with the GSC recommended rate of 10%, noting other Councils have adopted this approach.</p> <p>6. Recommends Council collaborate with CHPs to investigate mechanisms to deliver more AH, including leveraging assets and vesting of</p>	<p>1. Noted</p> <p>2. Noted</p> <p>3. Noted. Council intends to explore mechanisms to deliver housing diversity as part of an intended housing diversity investigation project.</p> <p>4. Noted</p> <p>5 -7. Refer to section 5.3 above.</p> <p>8. Council does not have any land that is underutilised or that may be developed as AH in view of the need to increase other social infrastructure to support the increasing population.</p> <p>9. Council has made previous detailed representations to DPIE about the need for real AH, including boarding houses, given the weight of evidence that this typology is delivering market micro-housing and not AH. The planning proposal seeks to increase studio and one-bed apartments to cater for the target micro-apartment market.</p>

No.	Author	Summary of submission	Review and comment
		<p>ownership of AH dwellings delivered under the scheme (or other long-term arrangements) to a Community Housing Provider (CHP).</p> <p>7. Recommends a range of mechanisms to deliver more diverse AH be explored, including granting of bonus GFA for AH in R3 and R4 zones.</p> <p>8. Recommends Council consider redevelopment of underutilised Council assets for AH.</p> <p>9. Supports Council's concerns about boarding houses not being rent-controlled. Encourages Council to make a submission to DPIE to rectify this issue. Also, Council needs to facilitate this typology to provide for the target market of young professionals and students.</p>	
46	Individual	Concerns are raised about noise impacts from low-flying helicopters in Mortlake. Has requested that the acoustic controls consider including air traffic other than just Sydney Airport Master Plan related.	<p>The submission is noted, however this matter is not relevant to the exhibited Planning Proposal.</p> <p>Concerns in relation to noise from helicopters should be directed to CASA or Air Services Australia.</p>
47	Individual	Suggests that it would be good to know Council's aspirational Affordable Housing targets, beyond what is financially feasible.	<p>The LSPS identifies an aspirational target of 5% affordable housing where a significant uplift in development occurs.</p> <p>Refer also to section 5.3 above.</p> <p>Further consideration will be given to this matter as part of an upcoming review of Council's Affordable Housing Policy.</p>
48	Individual	Requests that land rezoning in North Strathfield be acknowledged in the LSPS and fast-tracked, in recognition of Sydney Metro West.	<p>The submission is noted, however this matter is not relevant to the exhibited Planning Proposal.</p> <p>Action 1.4 of the LSPS acknowledges Sydney Metro West and includes actions that Council will undertake to deliver high quality outcomes around all Metro West stations.</p>
49	Individual (1 of 2)	Concern that the planning proposal makes no provision of the 'Sydney	The submission is noted, however this matter is not relevant to the exhibited Planning Proposal.

No.	Author	Summary of submission	Review and comment
		West Metro Light Rail Station proposed for North Strathfield’.	The planning proposal is the first stage in a phased implementation of the LSPS. Council is undertaking work to support high quality outcomes around all Metro West (heavy rail) stations.
50	Lucy Liu representing North Strathfield Residents’ Group	The submission comprises only the Attachment to Petition Letter - North Strathfield Residents Group . The Attachment is a duplicate of Petition Letter (Proforma) Number 1 submitted for the exhibition of the LSPS and the Local Housing Strategy in September 2019. Refer to section 6.1 above.	The submission does not address the content of the planning proposal. No action required. On 23 June 2020, Council advised the correspondent by email that, as the submission related to a previous exhibition which had since closed, it could not be addressed as part of the exhibition for this planning proposal. They were advised to consider making a new submission that addressed the planning proposal.
51	Individual (1 of 2)	Request that, as a land owner within the vicinity of Metro West station, to have an input into the PRCUTS stages 1 and 2 before it goes to public exhibition, to be part of the conversation regarding potential changes to FSR and Building Height.	The submission is noted, however this matter is not relevant to the exhibited Planning Proposal. Council is working to deliver Stage 1 of PRCUTS. Future work will support Stage 2 and Metro West and involve extensive community consultation.
52	Individual (2 of 2)	There needs to be more capacity for development along Parramatta Road through to Burton Street, as per the PRCUTS. FSR and building height in areas designated medium density should be reviewed in light of Sydney’s housing shortage to allow for apartments and more affordable housing, particularly around new Metro Stations.	The submission is noted, however this matter is not relevant to the exhibited Planning Proposal. Council is working to deliver Stage 1 of PRCUTS. Future work will support Stage 2 and Metro West and involve extensive community consultation.
53	Margaret Benn, Convenor representing Save North Strathfield Residents Action Group	Supports Land Zoning Maps – current and proposed and retention of R2 zone for North Strathfield to protect the current character of the area. Supports medium density housing - town houses and duplexes – within an R2 zone.	Refer to section 5.2 above.
54	TfNSW	1. TfNSW will request Victoria Road, Parramatta Road, Victoria Road and the M4 on-off ramps to be rezoned to	1. In August-September 2019 Council corresponded with Westconnex about Council’s proposal to rezone the M4 on-off

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		<p>SP2 Infrastructure as a separate request.</p> <p>2. Request that reference to Lot 1 DP1220625, 32-34 St Georges Crescent Drummoyne, be removed from the proposed changes to Schedule 1 Additional Permitted Uses Clause 9, as the land is located outside of the LGA.</p> <p>3. Advises that major uplift proposals, including Rhodes East and PRCUTS, are to be supported by comprehensive transport assessments undertaken as part of the LEP process to identify potential land components in as timely manner as possible and avoid ad-hoc site-by-site negotiations.</p> <p>4. Strongly supports inclusion of a new objective for B1 Neighbourhood Centre <i>"To provide for services and employment within walking distance of residences"</i>, to promote the use of public and active transport and discourage reliance on private vehicles.</p> <p>5. Request that Council investigate a range of travel demand management measures, including amendments to Council's LEP and DCP, to be included in subsequent stages of the LEP.</p> <p>6. Advises that Council should consider how to give effect to actions contained in the District Plan on protecting freight corridors and industrial land from encroachment by sensitive land uses and managing the interfaces of industrial areas in this and/or future LEP updates.</p> <p>Also that Council recognise that freight rail forms an essential and invaluable component of NSW's freight and logistics network and in turn for the NSW economy.</p>	<p>ramps to SP2 Infrastructure. TfNSW was subsequently notified of the exhibition. All separate requests by TfNSW to rezone State road infrastructure will be addressed once received.</p> <p>2. It is recommended that Lot 1 DP1220625, as well as Lot 1 DP 1220625 and Lot 2 DP 1220625, be removed from reference in the clause, as these Lots are also outside of the LGA.</p> <p>3. Council has been working collaboratively with TfNSW since 2018 to produce a comprehensive traffic model to support the PRCUTS. Completion of this work is dependent on the Agency providing data and confirmation of modelling methodology to Council. Council has not yet received the data.</p> <p>Rhodes East is part of the greater Rhodes Planned Precinct project being modelled and progressed by DPIE.</p> <p>4. It is recommended that the new objective proposed by TfNSW be included in the planning proposal.</p> <p>5. The Agency previously made this request in a submission to the LSPS and which Council responded to by expanding Action 2.1 and adding a new Action 12.5.</p> <p>Given the unknown timeframe before Council implements the measures sought by the Agency, it is also recommended that an additional aim be added under Clause 1.2 Aims of the Plan to give additional weight to the LSPS.</p> <p>6. Council's LSPS includes actions that are intended to protect freight and service vehicle movements, whilst protecting sensitive development. Council is currently implementing these Actions as part of implementing the PRCUTS, which include precincts on the</p>

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			<p>Parramatta Road freight corridor and the T9 Northern Line.</p> <p>Rhodes East is part of the greater Rhodes Planned Precinct project being progressed by DPIE.</p>