



Ms Lindy Deitz
General Manager
Campbelltown City Council
PO Box 57
CAMPBELLTOWN NSW 2560

Dear Ms Deitz

Campbelltown City Council Local Housing Strategy

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

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

I can confirm that I have determined to approve the Campbelltown LHS. My decision reflects the analysis undertaken to develop a comprehensive strategic planning and evidence base to inform your LHS and deliver 7,100- 8,250 dwellings for the period 2021-26.

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

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

The approval is also subject to the following requirements:

1. Council is to revise the 6-10 year (2021-2026) target to 7,100 – 8,250 dwellings to align with the lower GSC target range identified in the LSPS Letter of Support for the Campbelltown LSPS on the basis that the committed pipeline and capacity of existing planning controls are capable of achieving this target range.
2. Within twelve (12) months of this approval being granted by the Department, Council is to review and revise the LHS Actions for housing diversity and housing affordability to ensure they clearly articulate expected outcomes. In doing so, Council is to:

- a. confirm future changes to the LEP and/or DCP to achieve the expected outcomes and the proposed timing by which Council will commence any necessary planning proposals;
 - b. update the nominated timeframes for all actions; and
 - c. nominate a timeframe for Action 4.7 of the LHS should it be retained.
3. As a direct outcome of Item 2 above, Council is to prepare and commence any planning proposals that are required to facilitate housing diversity and/or affordability outcomes within twelve (12) months of this approval being granted by the Department. Council is encouraged to actively engage with the Department and other State agencies to ensure the evidence base and strategic merit of any proposal is well understood,
4. To enable achievement of Council's 6-10 year (2021-2026) GSC housing target, Council is to complete draft LEP amendments for the following planning proposals and submit to the Department for finalisation by the following dates:
 - PP-2020-3129 Menangle Park **21 April 2022**
 - PP-2020-3305 Kellicar Road, Macarthur **11 August 2021**
5. Within six (6) months of Council being notified of the LHS approval, Council prepares an updated and prioritised Implementation and Delivery Plan that clearly articulates the actions, roles and responsibilities and timing to facilitate housing supply, diversity and affordability between 2021 and 2026 and beyond. The Plan should be prepared in consultation with DPIE, TfSNW, Sydney Water and the Western Sydney Planning Partnership, to ensure any interdependencies are satisfactorily resolved.
6. As part of the required Implementation and Delivery Plan per requirement 5 above, Council is to provide the Department with the proposed program and milestones for finalising the current active planning proposals, which collectively will support the achievement of Council's 6-10 year and 10+ year housing supply horizons:
 - a. Minto Urban Renewal (PP-2020-3670)
 - b. The Meadows (PP-2020-3901)
 - c. St Andrews Rd, Varroville (PP-2020-2816)
 - d. Gilead Stage 1 (PP-2020-3093)
 - e. Ingleburn Town Centre (PP-2020-1845).
7. Future iterations of the LHS should provide housing diversity targets including non-standard dwellings, and outline the specific diversity and affordability outcomes that will be implemented to support key cohorts such as seniors housing, key worker housing, affordable housing and other typologies that suit the changing needs of existing and future households in identified investigation areas.
8. Future iterations of the LHS should consider the Metropolitan Rural Area and outline the specific actions that will be implemented to protect the rural, environmental and natural attributes of the Campbelltown City LGA.
9. Future iterations of the LHS should consider the Glenfield Place Strategy, if necessary.

10. 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 Campbelltown's housing needs.
11. In line with Council's commitment, it is to prepare an Affordable Housing Contribution Scheme (AHCS) in accordance with the Department's *Guideline for Developing an Affordable Housing Contribution Scheme*. This is to commit Council to examine the feasibility of levying affordable housing contributions for any new planning proposals that would result in development uplift or an increase in land value. When preparing the AHCS, 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.
12. Council is to collaborate with DPIE and other State agencies (in particular Sydney Water and TfNSW) to ensure infrastructure provision aligns with land release/housing delivery and to better articulate impacts to housing delivery.
13. When preparing planning proposals, Council is to clearly articulate the methodology used to calculate dwelling potential, and ensure robust data is included in future iterations of the LHS.
14. Council is to undertake a review of the LHS in 2022/23 following release of the updated Western City District Plan / Future Transport 2056 Plan. The outcomes of the review and any updates to the LHS are to be submitted to the Department for approval.
15. Council is to prepare principles for assessing proponent-initiated requests for planning proposals, including out-of-sequence criteria to consider any additional opportunities for growth that are not identified in its LHS, or for urban renewal opportunities.
16. The direction and strategic planning approaches endorsed in any State-led strategies or plans are to prevail in the event of any inconsistency with this approval and/or the Council's LHS (as revised and current).
17. Council is to update or revise its LHS to inform Council's updates/revision to its Local Strategic Planning Statement following the making of a future District Plan.

Any planning proposals for new housing development will be assessed against Campbelltown City LHS, the requirements above and Advisory Notes enclosed. Any State Government policy changes that may occur in the future are to prevail in the event of any inconsistency.

Implementing your Local Housing Strategy

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

To meet these commitments, a detailed implementation plan is required. This should reflect a comprehensive work program for all strategic planning work Council commits to undertake to

implement its LHS, and should include but not be limited to work streams related to items identified in the LHS Actions.

Local Housing Strategy Reviews and Updates

We strongly recommend that Council review and revise (where required) its LHS before the LSPS is required to be reviewed by the GSC. This will help best inform the next update to the LSPS.

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

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

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

Yours sincerely

Amanda Harvey
Executive Director
Local Strategies and Plan Making

8 July 2021

Encl: Advisory Notes



Campbelltown Council Local Housing Strategy

Advisory Notes

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

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



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
<p>Making appropriate provision for any additional housing opportunities that may arise out- of-sequence</p>	<p>The inclusion of a transparent and robust framework to consider additional opportunities will assist Council, the Department and other relevant agencies to assess proposals that are inconsistent with the LHS. It will also ensure that changes to land use or development controls do not take place without demonstrating strong strategic merit. Council is encouraged to develop a framework within which to consider such proposals, including but not limited to the following heads of consideration:</p> <ul style="list-style-type: none"> • Strategic merit and case for change • Robust demographic evidence • Housing Affordability and Diversity • Demand analysis and economic impacts • Infrastructure delivery and funding to be borne by the proponent • Stakeholder consultation and outcomes • Sustainability and resilience
<p>Community and Stakeholder Engagement</p>	<p>Incorporate the findings of any future relevant community and stakeholder engagement.</p>
<p>Consultation and engagement with agencies</p>	<p>Council should continue consultation with the following agencies:</p> <ul style="list-style-type: none"> • TfNSW in relation to <ul style="list-style-type: none"> ○ planning for city-shaping & city-serving transport initiatives in Future Transport 2056 and alignment with Council-led transport infrastructure initiatives, ○ infrastructure to support rapid and improved bus connections between Western Sydney Airport and Penrith, Liverpool, Blacktown and Campbelltown-Macarthur; and ○ identifying appropriate locations for housing intensification with consideration of public transport serviceability. • SINSW: <ul style="list-style-type: none"> ○ Prior to the finalisation of any future strategy or planning proposal that proposes a significant increase in the number of dwellings; and ○ When Council is aware of variations in the following: <ul style="list-style-type: none"> - The actual number of lots or dwellings varying from planning proposal estimates/ strategic plans. - An emerging demographic that varies from the planned population profile, either with more or less families with children.



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	<ul style="list-style-type: none"> - Rates of development and dwelling take-up varying from planned release programs or forecast residential take-up rates. <p>This is to ensure SINSW specifically understands where growth, or changes to growth rates are occurring and can effectively respond by targeting appropriate resourcing to impacted Government schools.</p> <ul style="list-style-type: none"> • The Department in relation to: <ul style="list-style-type: none"> ○ the application and ongoing effectiveness of State Environmental Planning Policy - Sydney Region Growth Centres; ○ potential opportunities to unlock barriers posed by the challenges of land fragmentation and its impact on the expected levels of housing delivery; and ○ South West Growth Area Structure Plan (planned).
Affordable Housing	<p>Council's LHS evidence base is considered sufficient to justify the preparation of a SEPP70 Affordable Housing Contribution Scheme (AHCS). An LHS requirement of approval is included for Council to prepare a scheme that sets out delivery and rent models, tenant eligibility criteria, tenancy allocation, asset ownership and management. Notwithstanding potential issues related to development feasibility, Action 18 of the Western City District Plan requires Council to prepare an AHCS. The scheme would be prepared in advance of any out-of-sequence planning proposals and sends a critical signal to the market regarding Council's strategic planning intentions regarding affordable housing provision. It will also commit Council to examining the feasibility of affordable housing contributions for all new proposals that are likely to result in an uplift of land value. If feasible and appropriate, affordable housing contributions would be required by LEP provisions that implement the contributions scheme. The scheme should be prepared in accordance with the <i>Greater Sydney Region Plan</i> key parameters for successful implementation of Affordable Rental Housing Targets and the NSW Government's <i>Guideline for Developing an Affordable Housing Contribution Scheme</i></p> <p>Council should continue to work with other councils in the Western Sydney Planning Partnership to assess options and the viability of affordable rental housing as part of the development of an Affordable Housing Strategy and AHCS.</p>
Seniors housing	<p>Council is encouraged to investigate the inclusion of seniors housing provisions in its LEP that increase the supply of housing for seniors and people with a disability.</p>
Interdependencies with relevant local evidence base	<p>Incorporate the findings and outcomes of latest studies, policies and State-led precinct plans prepared since the publication and release of the LHS, including but not limited to:</p> <ul style="list-style-type: none"> • Floodplain Risk Management Plan (FRMP) for the Bow Bowing Bunbury Curran Catchment



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
	<ul style="list-style-type: none"> • Western City Affordable Housing Strategy; • South West Growth Area Structure Plan (planned), and • Sydney Water Growth Servicing Plan 2020-2025 (recently updated).
Structure Plan	Future iterations of the LHS should include a structure plan(s) that clearly identifies housing growth areas/precincts and their anticipated delivery over the short, medium- and longer-term horizons. Annotations to identify likely yield ranges and any key threshold assumptions should also be included.
Data	
Clarification of 610 year target and 10-20 year housing forecast.	<p>Revisions to the LHS should provide a breakdown of how the 6-10 year target will be achieved, including when and where anticipated supply will be delivered and explain market take up rates. LHS revisions will also need to include a revised housing delivery forecast for the 10-20 year period as new information becomes available.</p> <p>Council should ensure that all population and dwelling forecasts are cross-checked against published DPIE projections to provide greater transparency. Additional guidance and support can be arranged with the Department’s Evidence and Insights team to resolve any discrepancies in dwelling forecasts.</p>