



Ms Gail Connolly
General Manager
Georges River Council
PO Box 205
Hurstville BC NSW 1481

Dear Ms Connolly

Georges River Local Housing Strategy

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

The Department commends Council on its strong commitment to strategic planning and the preparation of a robust evidence base to support the LHS, providing a clear understanding of the housing needs, challenges and opportunities in the Georges River local government area within the context of the South District and the Greater Sydney Region.

I note Council's considerable work in developing a consistent planning framework in the consolidated Georges River LEP to replace the former Hurstville and Kogarah LEPs.

I have determined to approve Georges River Council's LHS dated July 2020. In doing so, I have determined that the approval is granted on the basis that the LHS:

1. is broadly consistent with the South District Plan and the Georges River Local Strategic Planning Statement (LSPS), subject to the requirements identified below.
2. demonstrates Council's commitment to implementing appropriate actions to deliver the housing-related priorities in the South District Plan and Georges River LSPS and its intent to prepare such Planning Proposals necessary to give effect to the District Plan.
3. incorporates a generally robust evidence base drawn from the *Evidence Base*, the *Inclusive Housing Strategy* and the *Housing Investigation Areas Paper*.
4. addresses housing supply, including the 6-10 year housing target, to be delivered mainly through capacity under existing planning controls and through the phased GRLEP updates.
5. identifies opportunities for longer term housing supply, noting however that further work will need to be undertaken including a comprehensive analysis of land use opportunities and constraints.

6. addresses the need for housing diversity through a centres-based approach and amendments to planning controls to create opportunities for infill medium density housing development.
7. addresses housing affordability, providing a robust evidence base and a commitment to implement an Affordable Housing Contribution Scheme (AHCS).
8. is generally consistent with Section 9.1 Directions and SEPPs, subject to the requirements identified below.

Requirements of Approval

My approval of the LHS is subject to Council addressing the following requirements:

1. Within four (4) months of Council being notified of the LHS approval, Council is to prepare an updated and prioritised Implementation and Delivery Plan that clearly articulates the actions, roles and responsibilities, sequencing 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 and Infrastructure NSW, to ensure any critical interdependencies are satisfactorily resolved. This plan is to ensure that the Department and other State agencies have a clear understanding of the roles and responsibilities required to deliver Georges River's housing pipeline.
2. 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 to evaluate what medium density is delivered under the changes adopted through amendments to the LEP. A monitoring and review system will ensure that appropriate mechanisms can be identified and implemented to meet Georges River housing needs over the medium to long term.
3. The planning for Beverly Hills Town Centre is to be brought forward as a separate planning proposal(s) ahead of the Stage 3 LEP amendment, where resolution can be found on the Moomba Gas Pipeline.
4. Council is to ensure the Planning Proposal for the Stage 3 LEP (2023) update to the GRLEP:
 - is informed by a completed Commercial Centres Strategy, Part 2;
 - creates capacity for new housing, balanced with enterprise, employment and service functions, for four or more centres, focusing on Hurstville, Mortdale and Riverwood to ensure implementation in a timely manner and subject to budget.
 - supported by finalised place-based strategies including the Mortdale Local Centre Master Plan;
 - addresses, where possible, opportunities for medium density transition zones around centres in line with the LHS;
 - addresses affordable housing through an Affordable Housing Contributions Scheme;

- is informed by studies to address infrastructure and open space funding and provision and revisions to Council's Development Contributions Plan (when finalised);
 - demonstrates consistency with the Principles for local centres detailed in the South District Plan, including identification of appropriate locations for (mid-rise/mid-scale) shop top housing in and medium density residential around local centres that provide good access to public transport and services; and
 - demonstrates consistency with the relevant Planning Priorities in the South District Plan regarding strategic centres.
5. Prior to Stage 4 GRLEP update (2025) or a future revision of the LSPS following the making of the next District Plan, Council is to complete the following work:
- use the criteria in the Housing Investigation Areas Paper, with any relevant adaptations, to confirm medium density housing investigation areas; and
 - re-evaluate take up of housing capacity under existing planning controls following the making of the Stage 1 and Stage 2 GRLEP updates.
6. Council is to review, and if necessary revise, the detailed analysis of opportunities and constraints to provide a strategic justification for the contribution of the Georges River LGA to the long term South District housing supply target.

Until this analysis and Part 2 of the Commercial Centres Strategy is completed and reviewed by the Department, Council's identified housing target of 14,000 dwellings for the 2016 to 2036 period is supported only as a minimum contribution. The analysis in this Assessment Report suggests that the potential opportunities for housing supply in the Georges River LGA may exceed Council's target. Further analysis should be supported by collaboration with DPIE, Transport for NSW (TfNSW) and other State agencies, Council's place-based planning work, and an understanding of requirements for transport and local infrastructure.

7. Council is to commit to a timeline for the investigations under The Kogarah Collaboration Area Place Strategy for student and affordable housing, short term accommodation and serviced apartments close to transport.
8. Council is to complete LHS Action 32 (investigate the use of R3 medium density zones as transition areas around centres) in conjunction with implementation of the Commercial Centres Strategy, noting that this may support the balancing of housing with employment, enterprise and service functions of centres and understanding cumulative impacts of new development.
9. Council is to collaborate with TfNSW to ensure the implementation of the LHS responds to existing transport service capacity and strategic transport planning. This may include the completion of specific transport studies that

consider road and rail network capacity, facilitating freight movement, and ongoing transport infrastructure investigation and investment.

10. Council is to implement the Inclusive Housing Strategy's recommendation for an AHCS, including identification of precincts for the affordable housing rental target, well prior to the Stage 3 update of the GRLEP, which is now not due until 2023. This will enable feasibility for affordable housing to be conducted for any further planning proposals going forward.
11. Council is encouraged to consult with the DPIE's Place and Housing Policy teams when preparing an AHCS and to work with DPIE to identify opportunities to achieve affordable housing delivery in medium density residential rezoning.
12. Council is identify hazard and risk issues from the Moomba High Pressure Ethane Gas Pipeline found along the T8 Airport & South line corridor and address these considerations consistent with the NSW Government's Hazardous Industry Planning Advisory Paper 10 – Land Use Safety Planning in all planning work and in any updates to the LEP or other planning decisions. Council is to continue collaborating with the Department's Place and Hazards teams on hazard and risk issues in relation to the Beverly Hills Master Plan.
13. Council is to consult with DPIE, Greater Sydney Place and Infrastructure and Housing Policy teams to identify options for the proposed 'big house' conversion approach and for seniors housing provisions in the LEP. While the LHS identifies an action to investigate the provision of housing for seniors through the LEP, there is insufficient evidence or analysis provided to support this action at this stage.
14. Council is to strengthen the application of its strategic framework for local plan making by:
 - Utilising clear criteria for identifying future housing investigation areas for the Stage 4 GRLEP update (2025);
 - Exhibition and finalisation of the comprehensive Georges River Development Contributions Plan; and
 - confirming the reliance on the Infrastructure Integration Advice Roadmap, the Open Space and Community Facilities Strategy and the Car Park Strategy in future iterations or updates to Council's LHS
15. Subject to completing appropriate studies, including the Biodiversity Study, Council is to bring forward a Planning Proposal in 2022 to implement Council's Foreshore Scenic Character Review. The Planning Proposal is to be supported by further evidence, including data on the number of affected lots and potential yield, to assess the potential benefits and of the proposed amendments to minimum subdivision lot sizes and changes to the Foreshore Protection Area.
16. Council is update or revise the LHS to inform its LSPPS following the making of a future District Plan.

17. The direction and strategic planning approaches endorsed in any future 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).

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.

Any planning proposals for new housing development will be assessed against the approved LHS and the requirements and advisory notes of this approval. Any State Government policy changes that may occur after the approval of the LHS 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.

The Georges River LHS demonstrates Council's commitment to facilitating a consistent housing supply pipeline through clear phasing of updates to the GRLEP to achieve the housing and associated priorities of the Georges River LSPS and the South District Plan.

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:

- Part 2 of the Commercial Centres Strategy,
- Relevant place based strategies including the Hurstville City Centre Urban Design Strategy and the Beverly Hills masterplan,
- Georges River Development Contributions Plan,
- Affordable Housing Contributions Scheme, and
- any other relevant studies or interdependencies with NSW Government decisions.

Local Housing Strategy Reviews and Updates

A review and update process will provide an opportunity to align Council's LHS and LSPS, ensuring a cohesive strategic planning framework is in place for the Georges River LGA. It will also provide Council with the opportunity to improve and clarify aspects of the LHS.

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.

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

The advisory notes enclosed provide specific guidance on matters that Council is encouraged to consider when updating the LHS. The Department will expect these 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 8275-1128.

Yours sincerely



Amanda Harvey
Executive Director
Local Strategies and Plan Making

23 June 2021

Encl: Advisory Notes



Georges River 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 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 Approach	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. This is encouraged to be informed by resourcing and budgets to demonstrate how housing targets will be delivered. The implementation plan should specifically address: <ul style="list-style-type: none">• Implementation of the Staged LEP amendments council has committed to under its LHS;• Implementation of an Affordable Housing Contribution Scheme (AHCS);• Part 2 of the Commercial Centres Strategy;• Relevant place-based strategies including the Hurstville City Centre Urban Design Strategy and the Beverly Hills masterplan;• Georges River Development Contributions Plan; and• any other relevant studies or interdependencies with NSW Government decisions.
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.



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:</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
<p>Strategic framework</p>	<p>Council is to strengthen the application of its strategic framework to local plan making by:</p> <ul style="list-style-type: none"> • Utilising clear criteria for identifying future housing investigation areas for the Stage 4 (2025) GRLEP update; and <p>Clarifying the use of the Infrastructure Integration Advice Roadmap, the Open Space and Community Facilities Strategy and the Car Park Strategy.</p> <ul style="list-style-type: none"> • Finalisation of the comprehensive Georges River Development Contributions Plan. <p>Council is to consider the following elements for future revisions of the LHS, or supplements:</p> <ul style="list-style-type: none"> • Articulating, including with mapping where appropriate, the relationship between Council’s centres hierarchy and the housing investigation areas identified in the LSPS; and • Explaining the role of other zones that permit residential development within the residential hierarchy, including the need to balance residential and commercial and other land uses.



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
<p>Consultation and engagement with agencies</p>	<p>Council is to continue consultation with the following agencies:</p> <ul style="list-style-type: none"> • TfNSW: ensure the implementation of the LHS responds to existing transport service capacity and strategic transport planning. This may include the completion of specific transport studies that consider road and rail network capacity, facilitating freight movement, and ongoing transport infrastructure investigation and investment. • Neighbouring councils: Identifying future collaborate with neighbouring councils to coordinated deliver of place-based planning outcomes for centres both near and across LGA boundaries. These include Ramsgate, Kogarah, Kingsgrove and Riverwood.
<p>Interdependencies with relevant local evidence base</p>	<p>Where relevant the findings and outcomes of latest studies, policies and State-led precinct plans prepared since the publication and release of the LHS, are to inform the preparation of Planning Proposals. These studies include:</p> <ul style="list-style-type: none"> • Commercial Centres Strategy, • Infrastructure Integration Advice Roadmap, • Open Space and Community Facilities Strategy, and • Car Park Strategy
<p>Facilitating a consistent housing supply pipeline</p>	
<p>Monitoring housing supply</p>	<p>In collaboration with DPIE, 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 including development applications, projects with development approval, and the delivery of housing opportunities associated with Phases 1 and 2 of the GRLEP (when finalised).</p> <p>Where there is evidence that planning controls are not enabling housing supply to be delivered, Council will collaborate with DPIE to identify additional opportunities and accelerate updates to its LEP.</p>



Matter	Consideration for future LHS updates and preparation and assessment of planning proposals
Centres and future housing opportunities	<p>Council is to complete Part 2 of the Commercial Centres Strategy and any associated place-based work and any studies to address infrastructure and open space funding and provision to ensure timely preparation of the planning proposal for the Phase 3 GRLEP update (2022/3).</p> <p>The identification of appropriate locations for additional housing around local centres is to be consistent with the <i>Principles for Local Centres</i> detailed in the South District Plan.</p>
Analysis of land use opportunities and constraints	<p>Council is to complete a more detailed analysis of opportunities and constraints to provide a strategic justification for future housing supply levels, prior to the preparation of the planning proposal for Stage 4 GRLEP update (2025).</p> <p>The LHS does not assess land use opportunities and constraints for future housing supply to inform Georges River LGA's capacity to contribute to the 20-year District housing supply target.</p>
Affordable housing	
Affordable housing contribution scheme	<p>Council is to implement the Inclusive Housing Strategy's recommendation for an Affordable Housing Contribution Scheme, including identification of precincts for the affordable housing rental target.</p> <p>Council is to work with DPIE to identify opportunities to achieve affordable housing delivery in medium density residential rezonings (prior to preparation of the Phase 4 (2025) GRLEP update).</p> <p>Council is to consult with the Department's Place and Housing Policy Team when preparing an AHCS.</p>
Hazard and risk	
Hazard and risk issues	<p>Council is to identify hazard and risk issues from the Moomba High Pressure Ethane Gas Pipeline found along the T8 Airport & South line corridor and address these considerations consistent with the NSW Government's Hazardous Industry Planning Advisory Paper 10 – Land Use Safety Planning in all planning work and in any updates to the LEP or other planning decisions.</p> <p>Council is to continue collaborating with the Department's Place and Hazards Team on hazard and risk issues.</p>