

## Post Exhibition - Planning Proposal - Affordable Rental Housing Review - Green Square Town Centre

File No: X008764

### Summary

This report is to finalise a planning proposal that will bring the affordable housing contribution scheme for the Green Square Town Centre into line with the rest of the local government area.

The high cost of housing is an important economic and social issue in Sydney, particularly with the City's local government area (LGA) where housing prices are amongst the highest in Australia. Increasing the amount of affordable rental housing available for lower income households is an urgent priority for the City.

*City Plan 2036: City of Sydney Local Strategic Planning Statement* (planning statement) and *Housing for All: City of Sydney Local Housing Strategy* (housing strategy) identify that from 2016 to 2036, an additional 10,855 affordable housing and 1,974 social housing dwellings are required to maintain the City's Sustainable Sydney 2030 target which requires that of all private housing in the City, 7.5 per cent will be affordable housing and 7.5 per cent will be social housing.

Council and the Central Sydney Planning Committee (CSPC) adopted Planning Proposal: Affordable Housing Review (original Planning Proposal) in September 2018. The original Planning Proposal expands the City's existing affordable housing contribution schemes across the entirety of the local government area, providing a comprehensive and transparent framework for the application of contributions when land is being developed. It aims to increase the amount of affordable housing in the City to contribute towards the City's Sustainable Sydney 2030, planning statement and housing strategy targets for affordable housing.

At the time of preparing this report the planning provisions proposed by the original Planning Proposal are being drafted by the Department of Planning, Industry and Environment and Parliamentary Counsel, but are not yet 'made'.

The subject of this report, Planning Proposal: Affordable Housing Review - Green Square Town Centre (Town Centre Planning Proposal), shown at Attachment B, is to correct an error in the original Planning Proposal which inadvertently excluded the Green Square Town Centre (Town Centre).

The intention of the Town Centre Planning Proposal is to insert the same provisions proposed by the original Planning Proposal into *Sydney Local Environmental Plan (Green Square Town Centre) 2013* and *Sydney Local Environmental Plan (Green Square Town Centre - Stage 2) 2013* (Town Centre LEPs). It also allows minor consequential amendments to *Sydney Local Environmental Plan 2012 (Sydney LEP 2012)* to retain consistency between the planning instruments.

The affordable housing contribution rates that currently apply in the Town Centre are not increased by the Town Centre Planning Proposal, remaining at one percent of non-residential floor space and three percent of residential floor space. However, the principal change brought about by the proposal is an increase in the equivalent monetary contribution rate. This increase is to more accurately reflect the full cost of delivering a square metre of affordable housing and bring it in line with the rate applied elsewhere in the local government area.

Council and the CSPC approved the Town Centre Planning Proposal and draft City of Sydney Affordable Housing Program (draft Program) for public exhibition on 17 September 2018 and 13 September 2018, as shown at Attachment C. A conditional Gateway Determination for the Town Centre Planning Proposal was issued in May 2020, and altered in June 2020 to address two minor operational issues, as shown at Attachment D. The Gateway Determination requested several minor amendments to the Town Centre Planning Proposal before it was placed on public exhibition.

This report follows the public exhibition of the Town Centre Planning Proposal and draft Program from 9 July 2020 to 23 July 2020. The City received seven submissions: five from individuals and landowners and two from organisations, namely the Property Council and City West Housing, the Recommended Community Housing Provider in Green Square. A summary of the submissions received, and the City's response is provided at Attachment A.

The majority of submissions expressed support for the planning proposal. Though City West Housing raised concerns about the proposed amendment to minimum and maximum dwelling sizes for units being dedicated as affordable housing. In response, a change to the Planning Proposal and the draft Program to remove the upper size limit is recommended.

It is noted that these changes predominantly affect the Green Square Town Centre LEPs only. They cannot change the intent of the original Planning Proposal that was adopted by Council in September 2018 to amend the Sydney LEP 2012. However, given the consideration arising from City West Housing's submission, the removal of the 90 square metre maximum will be proposed as part of the upcoming update to the comprehensive local environmental plan.

This report recommends Council approve the Town Centre Planning Proposal and draft Program, as amended. If approved, the Town Centre Planning Proposal will be referred to the relevant plan making authority to be made as a local environmental plan.

## Recommendation

It is resolved that:

- (A) Council note the matters raised in response to the public exhibition of the Planning Proposal: Affordable Housing Review - Green Square Town Centre and draft City of Sydney Affordable Housing Program as shown at Attachment A to the subject report;
- (B) Council approve the Planning Proposal: Affordable Housing Review - Green Square Town Centre, shown at Attachment B to the subject report, and refer the Planning Proposal to the relevant local plan-making authority to be made as a local environmental plan;
- (C) Council adopt the City of Sydney Affordable Housing Program, shown at Appendix A to Attachment B to the subject report, specifying the date of publication of *Sydney Local Environmental Plan (Green Square Town Centre) 2013*, *Sydney Local Environmental Plan (Green Square Town Centre - Stage 2) 2013* and *Sydney Local Environmental Plan 2012* as the date the approved affordable housing program comes into effect; and
- (D) authority be delegated to the Chief Executive Officer to make any variations to the Planning Proposal: Affordable Housing Review - Green Square Town Centre, shown at Attachment B to the subject report, and the City of Sydney Affordable Housing Program, shown at Appendix A to Attachment B to the subject report, to correct any minor errors prior to finalisation of *Sydney Local Environmental Plan (Green Square Town Centre) 2013*, *Sydney Local Environmental Plan (Green Square Town Centre - Stage 2) 2013* and *Sydney Local Environmental Plan 2012*.

## Attachments

- Attachment A.** Summary of and Responses to Matters Raised in Submissions
- Attachment B.** Planning Proposal - Affordable Housing Review - Green Square Town Centre - Post Exhibition
- Attachment C.** Resolutions of Council and the Central Sydney Planning Committee
- Attachment D.** Gateway Determinations

## Background

1. Sydney remains Australia's least affordable city. The high cost of housing is an important economic and social risk, particularly within the City of Sydney local government area (LGA) where housing prices are amongst the highest in Australia.
2. The Metropolis of Three Cities: Greater Sydney Region Plan (Region Plan) and the Eastern City District Plan (District Plan) were released by the Greater Sydney Commission in March 2018. The Plans establish affordable housing targets and require councils to prepare a Housing Strategy that provides a planning pathway for achieving targets.
3. *City Plan 2036: City of Sydney Local Strategic Planning Statement* (planning statement) and *Housing for All: City of Sydney Local Housing Strategy* (housing strategy) identify that from 2016 to 2036, an additional 10,855 affordable housing and 1,974 social housing dwellings are required to maintain City's Sustainable Sydney 2030 target which requires that of all private housing in the City, 7.5 per cent will be affordable housing and 7.5 per cent will be social housing.
4. Three affordable housing 'schemes' currently operate in Ultimo Pyrmont, Green Square urban renewal area and the Southern Employment Lands.
5. In addition to contribution schemes the City also uses preferential zoning, planning agreements when changes are made to planning controls and material support including grants to non-government organisations, as well as granting or selling land below cost to community housing providers.

## **Planning Proposal: Affordable Rental Housing Review (original Planning Proposal) and City of Sydney Affordable Housing Program**

6. Council and the Central Sydney Planning Committee (CSPC) adopted Planning Proposal: Affordable Housing Review (original Planning Proposal) and the City of Sydney Affordable Housing Program (Program) in September 2018.
7. The original Planning Proposal expands the City's existing affordable housing contribution schemes across the local government area, providing a comprehensive and transparent framework. It aims to increase the amount of affordable housing in the City to contribute towards the City's affordable housing target.
8. The key effects of the planning proposal are to:
  - (a) expand the current affordable housing programs operating in the Green Square renewal area (excluding the Town Centre) and the Southern Employment Lands to other land including Central Sydney and land referred to as 'residual land'; and
  - (b) capture a supplementary affordable housing contribution on sites which benefit from increased development capacity and land value through a planning proposal, via a new schedule of sites in Sydney LEP 2012.

9. The requirements contained in the Program adopted by Council and the CSPC in 2018 were, in some cases, an extension of requirements or practices already established under existing affordable housing programs, and in others, were new requirements. The key changes and additions adopted included:
  - (a) establishing an equivalent monetary contribution amount per square metre for affordable housing contribution rates across the LGA;
  - (b) an effective increase in the equivalent monetary contribution amount as it applies to Green Square (excluding the Town Centre) to bring it in line with the amount applicable in the employment lands and more accurately reflect the full cost of delivering a square metre of affordable housing;
  - (c) establishing a consistent indexation method across the LGA for the equivalent monetary contribution amount, to ensure contributions follow movements in local area housing costs;
  - (d) allowing for contributions collected in Green Square (excluding the Town Centre) to be spent anywhere in the LGA, where previously they must be spent within Green Square;
  - (e) establishing an approach to determine the appropriate contribution rate to apply to Planning Proposal land; and
  - (f) stipulating that affordable housing contributions are to be collected by the City and passed onto City West Housing to provide affordable housing.
10. At the time of preparing this report the planning provisions proposed by the original Planning Proposal are being actively drafted with the Department of Planning, Industry and Environment (Department) and Parliamentary Counsel, but not yet 'made'. Most recent advice is that the expansion of the City's current contribution schemes will be implemented, however the new schedule will be included at a later time when there is a site that is subject to it.

### **Planning Proposal: Affordable Rental Housing Review - Green Square Town Centre (Town Centre Planning Proposal) and draft Program**

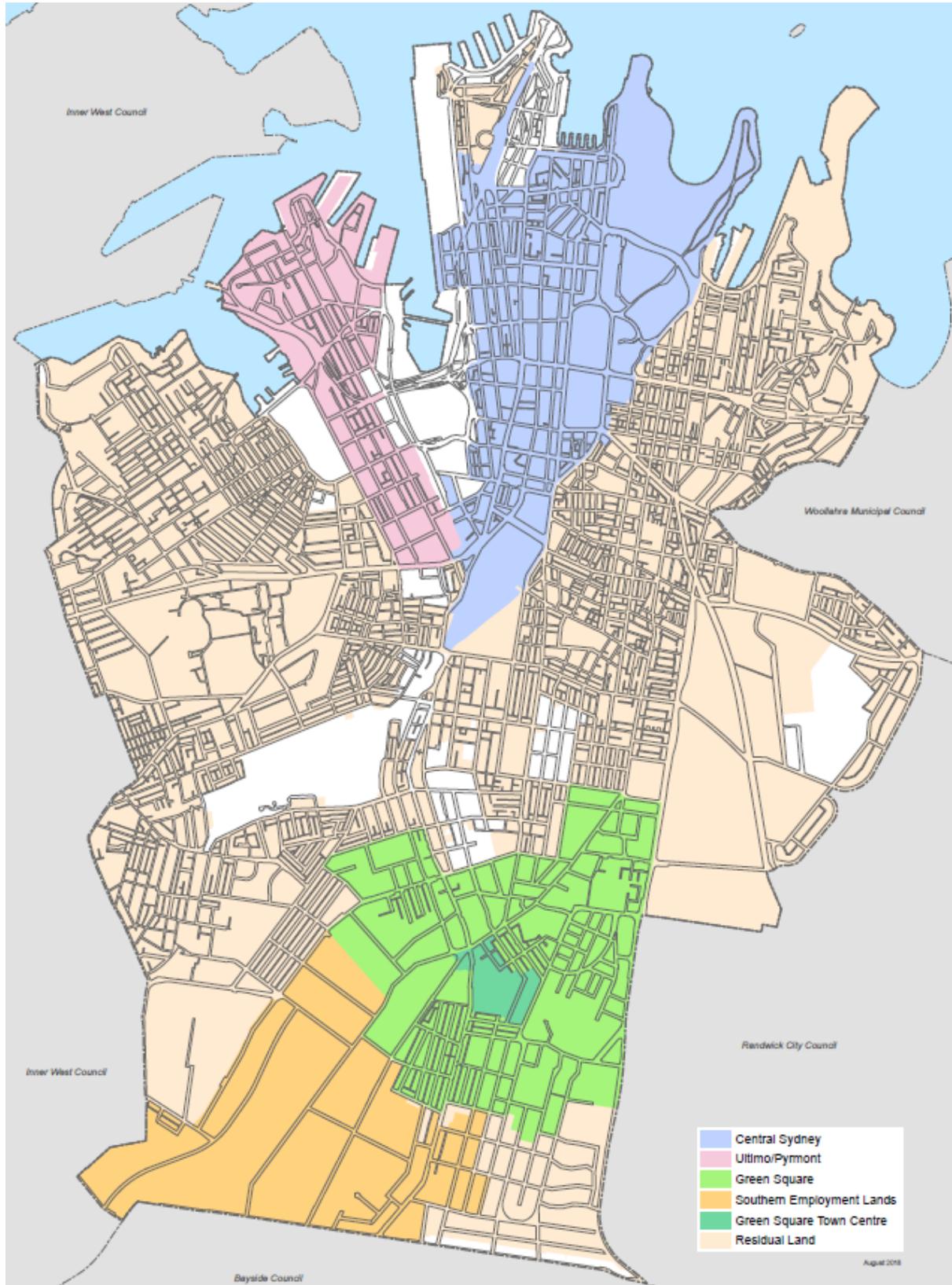
11. Council and the CSPC approved the Planning Proposal: Affordable Housing Review - Green Square Town Centre (Town Centre Planning Proposal), shown at Attachment B, and draft City of Sydney Affordable Housing Program (draft Program), shown at Appendix A to Attachment B, for public exhibition on 17 September 2018 and 13 September 2018. The resolutions are shown at Attachment C.
12. The land to which the Town Centre LEPs apply is shown by the area identified as the Green Square Town Centre at Figure 1. This figure also shows other land in the city, which may be affected by affordable housing contribution requirements under the Sydney LEP 2012.
13. The Town Centre Planning Proposal corrects an error in the original Planning Proposal which inadvertently excluded the Town Centre area and brings it into line with the affordable housing framework for the rest of the LGA.

14. This report recommends Council approve the Town Centre Planning Proposal and draft Program. If approved, it will be referred to the relevant plan making authority to be made as a local environmental plan.

#### **Gateway Determination**

15. The Town Centre Planning Proposal was referred to the Department in October 2018 with a request for Gateway Determination (Gateway). The Department issued a conditional Gateway in May 2020. In June 2020 an alteration to the Gateway was issued to address some minor matters arising with the implementation of the planning proposal. Both are shown at Attachment D. The Gateways required some changes to the Town Centre Planning Proposal prior to public exhibition to:
  - (a) incorporate a map showing the land to which the proposed amendments affect;
  - (b) update the date of commencement for the increase to equivalent monetary contribution rates for Green Square, to allow for the time elapsed during the consideration and drafting of the original Planning Proposal by the Department;
  - (c) update the project timeline to reflect the anticipated timeframes for the plan-making process;
  - (d) expand the planning proposal to apply to Sydney LEP 2012 to allow an update of the adoption date of the Program, as applicable to the whole LGA, if it is re-adopted by Council and the CSPC following consideration of this report; and
  - (e) include a savings provision in both the Town Centre LEPs and the Sydney LEP 2012 that ensures conditions of consent, applied before the new provisions are inserted in the Town Centre LEPs, remain applicable.

Figure 1: Land to which affordable housing contributions will apply (including Green Square Town Centre)



16. The Gateway did not delegate authority to Council to draft and make the LEP. If approved by Council and CSPC, the Town Centre Planning Proposal will be referred back to the relevant authority for legal drafting and finalisation.

### **Outcomes of the Town Centre Planning Proposal and draft Program**

17. The Town Centre Planning Proposal corrects an error in the original Planning Proposal which inadvertently excluded the Green Square Town Centre (Town Centre). The proposal is to insert the same provisions proposed by the original Planning Proposal into *Sydney Local Environmental Plan (Green Square Town Centre) 2013* and *Sydney Local Environmental Plan (Green Square Town Centre - Stage 2) 2013* (Town Centre LEPs). It also allows minor consequential amendments to *Sydney Local Environmental Plan 2012 (Sydney LEP 2012)* to retain consistency between the planning instruments.
18. The Town Centre Planning Proposal is supported by the draft Program, shown at Appendix A to Attachment B, which, if adopted by Council in accordance with the recommendations of this report, will update the City of Sydney Affordable Housing Program adopted by Council in September 2018 and replace the Green Square Affordable Housing Program that currently applies to the Town Centre.
19. The draft Program will facilitate the following key changes to the way the Green Square affordable housing scheme is currently administered:
  - (a) adjusts the equivalent monetary contribution rate, as adopted with the original Planning Proposal in September 2018, so that it is consistent across the LGA though it is an increase on the current rate paid in the Town Centre.
  - (b) allows contributions collected in Green Square to be spent anywhere in the LGA, where currently they must be spent within Green Square, in response to a request from City West Housing as it is increasingly difficult to secure land,
  - (c) establishes an approach to determine the appropriate contribution rate to apply to Planning Proposal land, being 12 per cent on the floor area facilitated by the planning proposal, and
  - (d) continues to require affordable housing contributions collected in the Town Centre to be passed onto the Recommended Community Housing Provider, being City West Housing, to build affordable housing.

### **Public Consultation - Discussion of Submissions**

20. The Town Centre Planning Proposal and draft Program were exhibited from 9 July 2020 to 23 July 2020. The City sent 635 letters to property owners in the Town Centre to notify them of the public exhibition. The exhibition was also advertised in the Sydney Morning Herald, through the City's website and the 'Sydney Your Say' e-newsletter.
21. The City received seven submissions: five from individuals and two from organisations, namely the Property Council and City West Housing, the Recommended Community Housing Provider in Green Square. A summary of submissions received and the City's response for the Town Centre Planning Proposal is provided at Attachment A, with key issues discussed below.
22. Amendments made to the original Planning Proposal and Program following their public exhibition were reflected in the exhibited Town Centre Planning Proposal.

23. Whilst one submission raised objection to the Planning Proposal on the basis that there is already too much affordable rental housing nearby, the majority of submissions expressed support for increasing the supply of affordable housing in Sydney. City West Housing highlighted this is especially relevant given the impact on the financial situation of many households as a result of the Covid-19 pandemic.
24. City West Housing did raise some concerns, echoed by one of the individual submissions, relating to the proposed dwelling size requirements for new affordable units.
25. The draft Program proposes the minimum size of any affordable housing dwelling to be dedicated to Council be reduced to 35 square metres in Sydney LEP 2012, and a maximum dwelling size of 90 square metres be introduced in the Program. Currently, Clause 7.13 of Sydney LEP 2012 requires any dedicated dwelling be no less than 50 square metres, but does not specify a maximum.
26. City West Housing itself avoids building apartments smaller than 50 square metres wherever possible due to the lower level of amenity provided to residents in a studio compared with a one-bedroom apartment. City West Housing highlights the potential for smaller units to exacerbate mental health issues which can be prevalent in residents. City West Housing finds units smaller than 50 square metres difficult to adapt to the changing needs of residents as they 'age in place'.
27. City West Housing also raised concern with the 90 square metre upper size limit. An apartment of this size, whilst allowing for three bedrooms, is considered by City West Housing to be on the small size for a larger household, particularly for Aboriginal households that tend to be larger.
28. The intent of the proposed reduction in minimum dwelling size in Sydney LEP 2012 is to reflect the minimum studio size under the Apartment Design Guideline. The maximum, expressed in both the original and the Town Centre Planning Proposals and the draft Program, was proposed to ensure the affordable housing floor area resulting from the contribution scheme can accommodate families with children, but is also used efficiently and to the benefit of as many people as possible.
29. Notwithstanding the above, while the 35 square metre minimum size still allows for affordable housing dwellings to be built which are larger than this, it is acknowledged that limiting dwelling size to 90 square metres or below would constrain future delivery of housing suitable for larger family groups. It is therefore recommended that the 90 square metre upper limit be removed from the Town Centre Planning Proposal and the draft Program.
30. It is noted that these changes predominantly affect the Green Square Town Centre LEPs only. They cannot change the intent of the original Planning Proposal that was adopted by Council in September 2018 and is currently being drafted to amend the Sydney LEP 2012. However, given the consideration arising from City West Housing's submission, the removal of the 90 square metre maximum will be proposed as part of the upcoming review of the comprehensive local environmental plan.
31. Council has never received a formal offer for the dedication of housing in instead of making an equivalent monetary contribution. As the 90 square metre maximum only impacts dedicated dwellings, it is unlikely the delay in removing the maximum from the Sydney LEP will have any substantive effect.

32. Whilst concurring with the need for further affordable housing in Sydney, the submission from the Property Council objects to the expansion of the City's affordable housing scheme. It reiterates the concerns raised relating to the original Planning Proposal, particularly given the current uncertain economic period stemming from Covid-19 and the impact that this will have on development.
33. The submission argues that many aspects of the Planning Proposal will make development unviable and could either stifle development or see development costs being passed on to home buyers thereby reducing general housing affordability.
34. To understand the economic impacts of the increase in the equivalent monetary contribution rate in Green Square, including the Town Centre, the City sought independent economic advice. The overarching objective of the economic testing was to appreciate the full impacts of implementing the additional affordable housing requirements. The testing was necessarily generalised and does not reflect the individual circumstances of every site, however it reflects the economic circumstances of most land.
35. The economic advice finds that in Green Square, where the contribution requirement has been in place for over 20 years and where only a moderate increase in the equivalent monetary contribution rates is being proposed, there is no immediate or long term impact on viability.
36. Notwithstanding the advice of the economic report, being that even if the equivalent monetary contribution was introduced immediately it would not impact viability, when the draft Town Centre Planning Proposal was reported to Council and the CSPC in September 2018 it allowed for a gradual phase-in of the increased rate to allow market expectations to adjust. This was done in response to submissions from Stockland, Urban Taskforce and the Property Council.
37. The Property Council submission also highlights the need for a consistent policy approach to affordable rental housing across the wider Sydney region, rather than a piecemeal LGA-based approach to the provision of affordable housing. The Property Council highlights other initiatives, such as built-to-rent schemes, which they feel should also be explored as methods to increasing affordable housing supply.
38. The City agrees that more needs to be done to increase the amount of affordable housing and supports the development of new affordable housing models, recognising that a range of approaches are required to address the significant shortfall of affordable housing in NSW. The City works with the state government to advocate for stronger affordable housing policies.
39. Noting that models such as build to rent deliver private rental housing to the market and do not necessarily deliver housing for lower income households, the City looks forward to working with the development sector to ensure these models can also contribute to the supply of affordable housing.
40. The City of Sydney has one of the highest housing growth rates in the state, with about 25,000 dwellings built in the five years to June 2019, and about 20,000 additional dwellings forecast in the next five years. The City's affordable housing contribution schemes, some of which have been in place since the mid-1990's and which have been in place through both high and low property cycles, have had no noticeable impact on development viability. The schemes have delivered a substantial amount of affordable housing in the LGA and make a critical contribution to the City's affordable housing targets.

## **Town Centre Planning Proposal - recommended post-exhibition changes**

41. Following consideration of submissions for the Town Centre Planning Proposal, it is recommended that the upper size limit for affordable housing dwellings be deleted from the Town Centre Planning Proposal and the draft Program to enable future delivery of housing suitable for larger family groups. No further changes are recommended to the Town Centre Planning Proposal and draft Program.

## **Key Implications**

### **Strategic Alignment - Sustainable Sydney 2030**

42. Sustainable Sydney 2030 is a vision for the sustainable development of the City to 2030 and beyond. It includes 10 strategic directions to guide the future of the City, as well as 10 targets against which to measure progress. This report is aligned with the following strategic directions and objectives:
  - (a) Direction 1 - A Globally Competitive and Innovative City - the Planning Proposal will facilitate low cost accommodation options for the key workers who are essential to the efficient functioning of the city.
  - (b) Direction 6 - Vibrant Local Communities and Economies - the Planning Proposal will facilitate improved housing diversity, providing low cost accommodation options to ensure a mix of people can live in the inner city, not only the very wealthy.
  - (c) Direction 8 - Housing for a Diverse Population - the Planning Proposal will promote housing diversity and contribute to the City's affordable housing targets.

### **Strategic Alignment - Region and District Plans**

43. The Region and District Plans released by the Greater Sydney Commission in March 2018 include targets and actions for the provision of affordable housing through the planning framework. The Plans require councils to develop local housing strategies to address the range of housing needs in their local areas, including affordable housing.
44. The Region Plan establishes an affordable housing target of five to 10 per cent of new residential floor area, subject to viability. The target is aimed at housing those most in need, specifically very low and low income households.
45. The Planning Proposal land approach aligns with the Region Plan and secures a reasonable proportion of the increase in land value when planning controls are changed. While this is applied on a site-by-site basis, it is considered at a precinct level and in the context of local housing markets.
46. The Region Plan provides the parameters for consideration in the successful implementation of these targets, including:
  - (a) measurement of the value created by the rezoning by applying a consistent viability test - the economic testing used to establish the target rates proposed in the draft Program for Planning Proposal land applied a standard Residual Land Value approach to establish viability;

- (b) the consideration of other contributions that may apply to the land, including any State Infrastructure Contributions - the target rates proposed in the draft Program for Planning Proposal land will be updated annually to allow for changes in market conditions;
  - (c) allowance for an increase in land value for vendors so that land is willingly sold and supply does not stall - the 'cost' of the 50 per cent sharing of value created when planning controls are changed does not impact on the value that is paid for land, which is typically purchased on the residual land value of land under existing planning controls. Even allowing for a reasonable level of speculation on future planning controls by both the vendor and the purchaser, there is sufficient value created in a change of planning controls to not unduly impact on the willing sale of land;
  - (d) allowance for developers to achieve normal profit margins on investment and risk - the economic testing assumed a normal profit on investment and risk; and
  - (e) a bespoke approach to allow for local circumstances - the economic testing is predicated on an assessment of local market conditions and planning requirements.
47. Economic testing demonstrates in the City of Sydney, on sites where planning controls have been changed to increase development capacity, substantially more floor area may be put towards an affordable housing outcome than the five to 10 per cent on new floor area benchmark proposed under the Region Plan.
48. The proportion is likely to increase significantly where land is rezoned from employment to residential uses. This is because the Region Plan approach only shares in value increase arising from the increase of FSRs and does not consider any value increase arising from rezoning land, which can be substantial.
49. The City's approach is based on equally sharing between the community and the landowner the residual land value increase resulting from changes to planning controls.

#### **Strategic Alignment - City Plan 2036: City of Sydney Local Strategic Planning Statement**

50. In March 2018, the NSW Government amended the Environmental Planning and Assessment Act 1979 requiring councils to prepare a Local Strategic Planning Statement (planning statement). The City's planning statement reinforces the links between the NSW Government's strategic plans and the City's community strategic plan, Sustainable Sydney 2030, and the planning controls that guide development in our city. The planning statement was adopted in February 2020 and published in March 2020.
51. The planning statement recognises affordable rental housing as critical social and economic infrastructure necessary to support a diverse and well-functioning city. It identifies that almost 11,000 affordable rental housing dwellings are required across the city to 2036 to achieve the Sustainable Sydney 2030's target that 7.5 per cent of all private housing is affordable housing, delivered by not-for-profit and other providers.

52. Priority L3 of the planning statement acknowledges there is potential to explore opportunities in the planning framework to increase the provision of affordable housing. Action L3.4(a) states 'Increase the diversity and number of affordable rental homes for lower income households by implementing the Planning Proposal: Affordable Housing Review to increase the amount of affordable rental housing. This Planning Proposal will facilitate to complete this action.

### **Affordable housing need**

53. Sydney housing costs are at a considerable premium compared to other parts of Australia. Research shows there is no housing that is affordable for purchase for very low, low and moderate income households in the City of Sydney. A moderate income household, for example on \$1,800 per week, can afford to pay \$600 per week in mortgage or rental repayments without being in housing stress.
54. In December 2019, the LGA median strata dwelling price was \$937,000. By comparison, the Greater Sydney median strata dwelling price was \$740,000. An average weekly mortgage of \$1,040 is required to service a loan of this size, based on a 10 per cent deposit, standard stamp duty charges built into a 30 year mortgage at a five per cent interest rate.
55. Rental costs are equally concerning. The LGA's median weekly rent in March 2020 for a two-bedroom unit was \$775 compared with the Greater Sydney's median weekly rent of \$540. This represents a 27 per cent increase from the \$610 median weekly rents in September 2010.
56. Even allowing for a slowing of the market, the disparity between housing costs in inner Sydney and the ability of very low to low income households to pay is significant. The need to increase the supply of affordable housing for very low to moderate income households is now urgent if very low to moderate income households are still to live in the LGA.

### **Affordable housing outcomes**

57. The number of affordable rental housing dwellings resulting from this Planning Proposal and other affordable housing schemes will be determined by:
- (a) the amount of development that occurs, which is influenced by market conditions;
  - (b) the approach to using any monetary contributions, that is, whether affordable housing units are built by a developer or a community housing provider; the dwelling size and mix; whether they are purchased; and how effectively resulting funds and dwellings are leveraged to provide additional stock; and
  - (c) future planning proposals.
58. There are 1,657 affordable rental housing dwellings in the LGA that are built or in the development pipeline. The estimated affordable housing dwellings that will result from original Planning Proposal and the Town Centre Planning Proposal is about 1,925 dwellings. It is noted estimates for some areas are difficult to establish based on assumptions and circumstances that may change, and therefore vary outcomes significantly.

**Relevant Legislation**

- 59. Environmental Planning and Assessment Act 1979.
- 60. Environmental Planning and Assessment Regulation 2000.

**Critical Dates / Time Frames**

- 61. The Gateway for the Town Centre Planning Proposal requires that the amendment to the Town Centre LEPs is completed by 5 November 2020.
- 62. The Gateway did not delegate authority to Council to draft and make the LEPs. If approved by Council and the CSPP, the Planning Proposal will be referred back to the Department for legal drafting. If approved by Council, the draft Program will come into effect on the same day as the amendment to the LEPs.

**GRAHAM JAHN, AM**

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