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APPENDIX A

28 March 2024

Department of Planning, Housing and Infrastructure
Locked Bag 5022
Paramatta NSW 2124

Dear Sir, Madam

Strathfield Council Draft Submission – Explanation of Intended Effect (EIE): Changes to create low and mid-rise housing (December 2023)

Strathfield Council appreciates the opportunity to provide preliminary comments on the proposed housing reforms, however, it is Council's position that the proposed reforms be deferred and further consultation and testing be conducted to safeguard our community against undesirable development outcomes by ensuring that current and future strategic planning efforts across the Strathfield LGA are not undermined.

Council recognises that there continues to be both housing availability and affordability issues across NSW and Australia. Indeed, this is an acute problem for most metropolitan cities across the globe which is being influenced by both macro and micro socioeconomic forces. However, the haste to respond to the current housing crisis should not be at the expense of good strategic planning or indeed on the ground outcomes which would result from poorly planned, executed or designed development.

Strathfield Council is making a material contribution to both housing supply and diversity with planning underway for the Homebush Transit Oriented Development (TOD) Accelerated Precinct and a Medium Density Housing Strategy, which respond to the issue of housing supply and delivery of low-mid-rise housing.

This submission is provided as a draft to the Department Planning, Housing and Industry (the Department) to ensure that it can be lodged with the Department within the stated consultation period. This submission will be presented to the first Council meeting of 2024 on the 27th of February. We

reserve the ability to amend, modify or update this submission once the matter has been fully debated at our February Ordinary Council meeting.

The following submission provides a summary of issues identified within the EIE by Council and was written following the guiding principles for councils as per Section 8A of the *Local Government Act* 1993.

1.0 Strathfield Strategic Planning Context

In the past 12 months, Strathfield Council has progressed through significant organisational change. Council continues to engage and collaborate with the Department about strategic opportunities with an immediate focus on housing delivery for the next 10 years. The Strathfield Local Strategic Planning Statement - *Strathfield 2040* - prioritises greater housing diversity options for people of all ages. Council's focus is primarily on development within key northern growth areas specifically targeting the Powells Creek and Parramatta Road Corridors in order to achieve housing supply. Council is progressing the acquisition and embellishment of land for new open space, where possible as well as progressing concept designs for new pedestrian and cycle links.

In regard to the proposed housing reforms, it is Council's view that the focus of development should be in existing, well serviced centres with access to frequent public transport such as heavy rail, Metro stations and light rail, and that commercial enterprises such as supermarkets must not be used as instrumental planning standards to drive housing growth distribution.

In that regard, it is noted that Housing Delivery Targets were due to be published by the Department at or around the end of 2023 along with the revised regional plans. This would provide a holistic picture of the planning landscape across Greater Sydney and allow for the prioritised delivery of housing growth accordingly. In the absence of the housing targets it is not possible to make a judgement as to the urgency to increase opportunity for new housing now and in light of other planning projects which might be underway.

Strathfield Council presently has two planning projects underway that will make a significant and material contribution to both housing diversity and supply.

1.1 Homebush TOD Precinct

Council is committed to the delivery of urban revitalisation, major housing and job growth within the area now identified as the Homebush Transport Oriented Development Precinct (Homebush TOD Precinct). The Homebush TOD Precinct will deliver significant housing supply within the LGA over the next 10 to 15 years and beyond. The required and necessary planning and technical studies are presently being prepared by NSW Government with support from Strathfield Council. This will see the delivery of a new Masterplan by the end of 2024. The dwelling yield from the Precinct has not yet been determined but is likely to be more than 3500 dwellings which is an increase of 19% upon the existing housing stock within the LGA. .

The Homebush TOD precinct is supported by Council and we are prepared to assist in the accelerated delivery of the masterplan in so far as the intent will be a well-considered and presented planning framework that will be supported by appropriate infrastructure investment.

However, Council considers that the changes proposed under the EIE are not supported by a comparable level of planning. There is an unknown quantum of development that will occur and the EIE proposes planning controls that appear broad and untested.

Strathfield Medium Density Housing Study (in progress)

With consideration given to the presumptive, but significant supply of higher density housing within the Homebush TOD Precinct, the focus of development outside of the northern growth area of the Strathfield LGA is toward improving housing diversity which necessitates a more considered response to ensure appropriate transition between established character and emerging housing typologies.

In 2023, Council allocated funds to the preparation, by consultants SGS Economics, Architectus and Micromex in partnership with Council own planning team, of the Strathfield Medium Density Housing Strategy (MDHS). Significant financial and operational resources have been allocated to this project to ensure that the study recommendations will be based on a robust methodology, comprehensive community engagement and informed by solid evidence. To date, the following key tasks have been completed:

- Suburb capacity analysis for low to mid rise development
- Review of existing planning controls and assessment of options

- Low-mid rise development options modelling and 3d visualisation
- LGA demographic and economic profiling
- Community consultation and representative market survey

The MDHS deliverables include a comprehensive review of local planning controls including recommended amendments to Strathfield Local Environmental Plan 2012 and Strathfield Consolidated Development Control Plan 2005. Such amendments may include changes to current land use permissibility for low density residential area, development standards and key development controls in order to provide greater diversity of housing types within certain areas of the Strathfield LGA whilst ensuring new development is respectful of the existing neighbourhood character.

A draft report with final recommendations will be reported to Council in March 2024. This will outline next steps which will likely include preparation of a planning proposal to give effect to the recommendations and update to the Strathfield DCP.

Community consultation for the MDHS commenced in November 2023 and will close in early March 2024. Preliminary findings indicate that the Strathfield community is generally supportive of increased townhouse, terrace and dual occupancy development within existing residential areas, and less supportive of low scale apartment developments (3 to 6 storeys). Concerns were raised regarding increased traffic, maintaining the aesthetic and landscape quality of the area, and sufficient provision of additional infrastructure and services to match development and growth in the LGA.

Importantly, the community survey results show that there is broad acceptance of increased housing diversity within existing residential areas and this responds to themes around housing affordability and the need to allow residents to transition between housing typologies as their circumstances change within their established community. However, this needs to take into account the need for new infill housing to be delivered well and be a design that is responsive to the prevailing characteristics of our areas. The blanket approach proposed under the EIE is counter to this critically important issue.

As the MDHS information pack shows in ATTACHMENT 1, potential development scenarios presented to the community by Council are generally aligned with the rudimentary well-located

development scenarios of the proposed reforms. Importantly, the MDHS housing typologies do not focus on FSR or height controls, but instead highlight the need for new development to respect established character, relationship with neighbours and existing site features such as mature trees and other landscape features including front gardens.

Given the work already completed as part of the MDHS, it is Council's view that our Strategy must be completed without interference or curtailment and that our localised approach to low rise and medium density housing delivery should be supported at the State level.

Any changes to local planning and development controls must be introduced at the individual Local Government level so as to encourage well planned, well designed medium density development in the appropriate areas of the Strathfield LGA.

Strathfield Council Recommendations: Strategic Planning Context

- That housing targets under preparation by the Department be released so that we, and other councils can understand and plan for future housing delivery here and across Greater Sydney.
- Strathfield Council is committed to improving housing supply and diversity and we recommend that the application of the Low-Mid Rise SEPP which has been proposed by the Department be deferred for the Strathfield Local Government Area so that we can complete the Strathfield Medium Density Housing Strategy and implement changes to our Local Environmental Plan and Development Control Plan.

Coordinated Infrastructure Planning & Delivery

Concentration of housing and population growth in well planned areas will allow Council to also plan for the delivery of new infrastructure which will support that new population. The ability for Councils to deliver new infrastructure which meets need is limited by both the existing caps on infrastructure charges and low levy rates under respective s7.11 and S7.12 Infrastructure Contribution Schemes. Infrastructure delivery must be carefully planned, scheduled and managed to ensure that Councils remain fiscally sustainable, and that best value is achieved.

The landscape of Infrastructure Contributions Schemes is a complex and contestable area. The existing \$20,000 cap placed upon contributions collected under s7.11 schemes has seen the value of contributions received decline in real terms in contrast to construction costs which have increased

significantly. This leaves Council with the difficult challenge of co-funding infrastructure projects from general revenue.

There is a risk that the whole scale changes to planning controls as proposed by the Department will result in development that is out of sequence or away from areas of planned infrastructure investment. Given the constrained fiscal context of infrastructure funding, there is no ability of Council to flex or pivot delivery in response to unforeseen or unplanned demand. It is likely that communities will experience additional housing growth but will not receive a proportional increase in infrastructure investment.

In any scenario, it is essential that Council's current contributions plans are updated to offset the costs of the provision of additional services well before such speculation will occur. State funding required for delivery of local infrastructure is also limited, disjointed and typically grant based. In order for place-based approaches to growth and uplift to succeed, they need to be complemented with a long-term coherent plan for infrastructure delivery and funding.

A place-based approach is required to address problems that are specific to the identified catchment of the proposed precincts in both State and Local development scenarios. Council must have appropriate infrastructure funding in place to ensure that growth is accompanied by new and renewed public open space, community facilities and social infrastructure, traffic, cycling and pedestrian links roads and drainage.

An example of a place-based approach to infrastructure delivery would be to capture public benefits through in kinds works. This might include provision of through site pedestrian links, publicly accessible open space or provision of publicly visible artworks. These, sometimes modest, additions can make a meaningful contribution to the character and experience of an area and are often identified through early masterplanning or structure planning exercises. Such additions are considered particularly important in high density residential areas and urban renewal locations, which need to improve the quality of public realm and urban amenity. The speed at which these changes are being brought forward would likely mean that these types of outcomes would be put aside, cannot be realised or indeed opportunities are simply not realised.

In addition to infrastructure charges, Council also believes that the basis for the rating system should be amended to reflect that recommendations of IPART. This means using the capital improved value,

rather than the current unimproved land value. This will allow councils to be better place to service the community and growing population whilst achieving financial sustainability in the long term.

Strathfield Council Recommendations: Infrastructure Planning and Delivery

- That increases to existing caps and contribution rates on infrastructures charges be brought forward by the NSW Government to allow for the appropriate funding of new infrastructure.
- That an appropriate mechanism be brought forward to ensure that public benefits can be captured by new development, in addition to just meeting housing demand.
- Infrastructure planning should recognise the increase in land values that will be attributed to these changes and make appropriate provision to support future infrastructure delivery
- That priority be given to growth within existing locations which are well serviced by public transport.
- Make the changes recommended by IPART in relation to Council Rates being calculated on capital improved value not unimproved land values.

Provision for Affordable Housing

Council is committed to the ongoing, logical, and orderly sequencing of development, and greater delivery and ongoing retention of affordable housing. It is noted that the EIE provides no explanation of affordable housing delivery associated with the proposed reforms despite the repropoed significant uplift in development potential. It is noted that comparable reforms under the Transport Orientated Development Program, include a 2% affordable housing provision, This is absent from comparable changes to comparable locations.

It is recommended that the Department work to support Council with the preparation of an Affordable Housing Contributions Scheme for the areas affected by the proposed housing reforms.

Strathfield Council Recommendations: Provision of Affordable Housing

- It is recommended that a baseline affordable housing contribution scheme be introduced, comparable to the reforms proposed under the Transport Orientated Development Program for the Tier 2 locations.

Definition of Station and Town Centre Precincts

The EIE proposes an in-principle position that mid-rise development should be permitted within Station or Town Centre locations. The Department has sought feedback on what would be the criteria to identify suitable E1 Local Centres for mid-rise development.

It is our position that the precinct criteria should not be applied separately. Indeed, mid-rise development should only be permitted in locations which are supported by well serviced centres and have accessibility to high frequency and good quality public transport. There may be other centres which are suitable for mid-rise development, however, this would require a case-by-case assessment and should not be subject to the whole scale changes put forward under the EIE.

A further consideration is the spatial distribution of centres along road corridors. In many cases centres are not poly centric and have organically growth with a linear structure. For example, areas such as those zoned for medium density residential along Liverpool Road are fragmented with small [E1 Local](#) Centres over several kilometres ([see Figure 1](#)). It would be inappropriate to apply a singular blanket catchment to these centres, as it would likely result in additional development occurring outside of a location with good access to essential services.

In the context of Strathfield, although housing growth opportunities exist in the southern areas of the LGA, these areas are typically further away from high capacity and high frequency public transport as well as essential local services such as those currently clustered around Strathfield Town Centre.



Figure 1. Fragmented small E1 Local Centres along Liverpool Road, Strathfield (Image Source: NSW Planning Portal Spatial Viewer)

In addition, there is ambiguity in the way in which station and centre precincts are proposed to apply. The proposed definition of station and town centre precinct is not sufficiently clear and is open to interpretation. It is also unclear whether this would be formally mapped or subject to interpretation by third parties or applicants. Clarification on the following points is requested:

- It is unclear how the 800m walking distance from a station will be measured. It would be interpreted as the outer most projection of the station platform, which would give a different catchment if measured from the pedestrian entry to the station.
- Related to above, clarification is sought as to whether physical barriers to walking catchments will be taken into account. Major roads, rail corridors and other linear infrastructure can affect pedestrian catchment and should be taken into account in defining station catchments.
- In the case of overlapping catchments for stations and centres, there should be a hierarchy as to which precinct criteria will apply.

The ambiguity of proposed Town Centre criteria along with the proposed non-refusal standards could result in uplift in locations that are not well serviced.

Strathfield Council Recommendations: Centre and Station Precinct Catchment Criteria

- That the EIE only apply to Centres which benefit from both access to goods and services and high frequency public transport (defined as a turn up and go service). Centres with no access to public transport station to this service standard should be excluded.
- Station and centre precinct catchments should be clearly defined and these walking catchments should consider physical barriers that would otherwise reduce the catchment
- Small, fragmented centres along roads corridors must be excluded from the EIE and Councils should be allowed to undertake site specific assessments in these circumstances to consider low-mid rise development opportunities.

Application of Non-Refusal Standards

Council reiterates the need for any changes to local development controls to be supported with strong evidence-based modelling and appropriate community consultation. The proposed development standards of FSR and building height appear to lend themselves to adverse design outcomes comprising continuous front fall with minimal to no building modulation, or separation between blocks. In particular, it would be dangerous to propose turning off minimum site area and width standards in Local Environmental Plans (LEP) (page 28 of EIE) as it will encourage Residential Flat Building (RFB) developments to build boundary to boundary on small or narrow sites, while achieving Apartment Design Guideline (ADG) compliance by providing windowless, blank walls on side elevations (see examples in Figure 2). The result is likely to be poor streetscape outcomes and is also not conducive to creating apartment units with good internal amenity such as natural cross ventilation and daylight. These examples of poor design outcomes become particularly stark in the context of Heritage Conservation Areas and Heritage Items. If there is not a clear statement that a merit based assessment is required, it will place Councils in a difficult position when trying to mediate site specific design responses and development outcomes.

Examples of the difficulties of negotiating this position include:

- The proposed development would have unacceptable bulk and scale impacts and height should be reduced; however it complies with the non-refusal standard in relation to building height.
- The proposed development would have an unacceptable impact in terms of the setting and context of a heritage conservation area or heritage item and should be reduced in scale, however, the development is compliant with the non-refusal standard in relation to FSR.



Figure 2. Examples of poor streetscape outcomes due to RFB developments with a generous FSR permissible on narrow sites

The relationship between non-refusal standards would become even more pressured in the context of advice from Design Review Panels. There is likely to be scenarios whereby unacceptable design outcomes are being put forward, that can only be resolved through modulation to building height or built form and it would seem unlikely that such requests would be heeded if it would result in a loss of FSR.

These developments standards lack sufficient testing and will likely to lead to a high expectation from applicants that the maximum Floor Space Ratio (FSR) can be delivered on a site without a willingness to moderate in order to suit local conditions and circumstances.

It is also worth highlighting that most Local Environmental Plans contain both FSR and height control provisions. They are not considered a non-refusal standard and it is well accepted that there needs to be a balanced interplay between Development Control Plan guidelines, State Environmental Planning Policy (SEPP) controls and site-specific circumstances. To specifically call out height and FSR as a non-refusal standard is an unnecessary step.

Furthermore, it is unclear as to whether the proposed FSR and height controls have been subject to any land use economic testing or development viability testing. Land value and sales revenue is not universal across Greater Sydney and there would appear to be an untested relationship between the design controls and financial feasibility. It may well be a lower threshold for feasibility in some locations which would allow for a less aggressive development outcomes.

It is Council's view that the proposed SEPP development standards are inconsistent with the Council's strategic planning for residential development in the area, and the standards are considered to run contrary to the SLEP objectives of E1 and E2 zones; and the SLEP objectives of cl 4.3 HOB and cl 4.4 FSR standards.

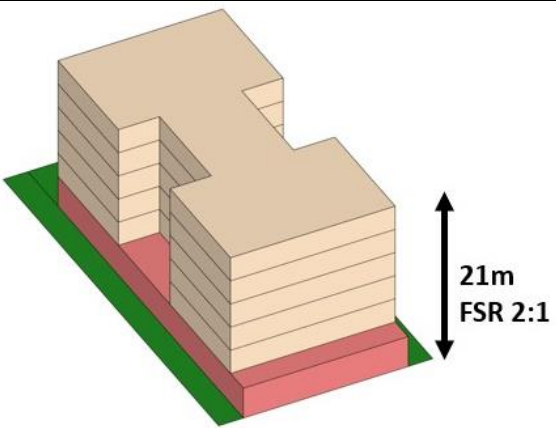
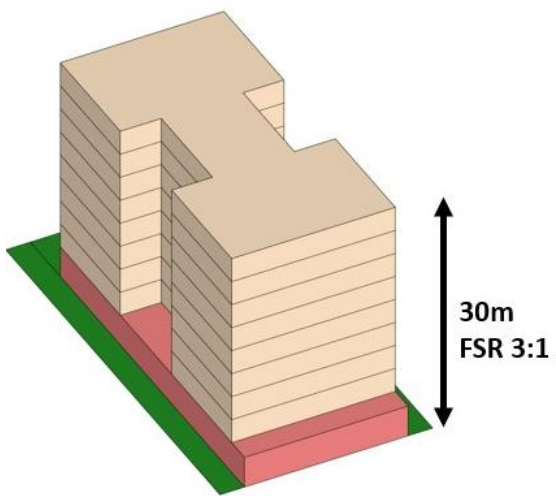
Relationship to other State Environmental Planning Policies

Council notes that the interaction between existing and proposed State development standards and design guidelines, and local Council planning controls could see an increase in Clause 4.6 variation requests, more contested Development Application processing times and more legal appeals. Typically, residential flat buildings that are designed to a height of six (6) storeys and a floor space ratio of 2:1 will achieve an acceptable built form outcome that corresponds with the guidelines of the ADG.

Therefore, there is a mismatch between the non-refusal standards of 6-storeys (21m) and FSR 3:1 which would require a Clause 4.6 variation to building height in order to achieve the maximum proposed 3:1 FSR non-refusal standard of the EIE. The drafting of clause 4.6 variations, and the construction of the arguments that can be used in support of them is becomes distorted when measuring local planning control objectives to ensure quality built form outcomes against the specific intentions of the existing SEPP (Housing) 2021 and the proposed EIE development standards to increase housing supply.

Given the numeric disparity between the proposed height and FSR standard, and Council's existing local height and FSR controls, LEP development standards in the affected areas would essentially be abandoned. Although development site conditions will vary on a case-by-case basis. Applicants may take further advantage of the ambiguity between existing Infill Affordable Housing SEPP provisions and the proposed reforms as demonstrated in the scenario in **Figure 3** below.

The scenario shows the high level of complexity assessment and interpretation that will arise as a result of the current and proposed Housing reforms and the unintended consequences that might arise.

Scenario	
<p>i. An Applicant designs a RFB development which reaches the EIE standard of 6-storeys (21m), but only achieves a FSR 2:1; so</p> <p>*Note: Existing land within R3 Medium Density Residential zones has a maximum building height limit ranging from 9.5m to 22m under Strathfield LEP 2012.</p>	 <p>21m FSR 2:1</p>
<p>ii. The Applicant wants an additional 9m (3 storeys) to achieve the EIE FSR 3:1; for a new height of 30m (9 storeys); and</p>	 <p>30m FSR 3:1</p>

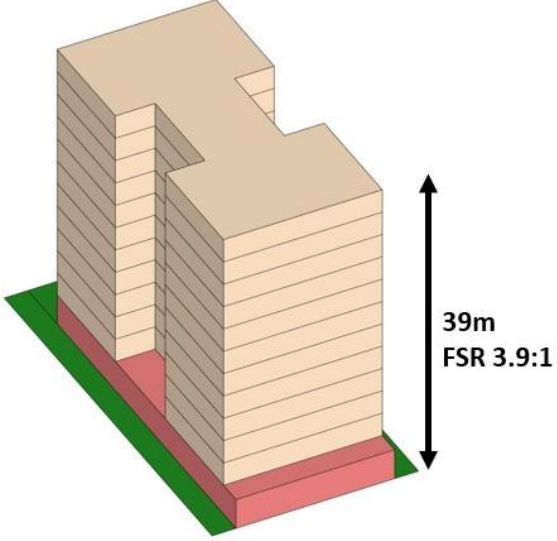
<p>iii. The Applicant is providing 15% affordable housing which would ordinarily qualify for a 30% FSR and building height bonus as an affordable housing component under the provisions of SEPP (Housing) 2021; so</p> <p>iv. The Applicant is seeking an additional 9m height bonus (30% x 30m) and FSR 0.9:1 bonus (30% x 3:1) for the infill affordable housing component of the development; so</p> <p>v. The Applicant lodges a Clause 4.6 variation request for 18m or an 85% variation to the original 21m building height EIE non-refusal standard with the justification that it is consistent with State objectives for housing supply.</p>	 <p>39m FSR 3.9:1</p>
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Figure 3. Scenario – Clause 4.6 height variation request exploiting EIE non-refusal standards and in-fill housing bonus

The consequence of these conflicting SEPP provisions would likely result in Applicants increasingly opting for court determination of development applications, adding time and financial costs to all parties. In this regard, the proposed housing reforms would only serve to exacerbate the current problems contributing to the housing crisis as identified in the EIE, for which local councils might be seen as directly responsible. It is recommended that the Department undertake a review of existing and proposed SEPP development standards and provisions and make amendments as necessary to provide consistency between the various planning instruments.

This also reinforces Council's view that the proposed SEPP be deferred until such time that Council can complete its Medium Density Housing Strategy and make recommendations for changes to the Strathfield Local Environmental Plan and Development Control Plan which will better align with the intended effect of the proposed SEPP reforms while also providing the necessary controls to achieve superior built form outcomes.

Strathfield Council Recommendations regarding Non-Refusal Standards

- The introduction of alternative development standards should be paused until such time that councils are able to complete our own studies regarding low and mid rise housing outcomes.
- Specifically, that Strathfield Council be allowed to complete and implement the findings of our own Medium Density Housing Study.

- That Councils be allowed to set location specific height and FSR controls in relation to low to mid rise development when it can be shown that they are achieving the objectives of the program.
- The reference to any height or FSR standards a non-refusal standard should be removed to avoid any confusion regarding the need to complete a merit based assessment.
- Design testing and economic analysis should be released to the community to provide the base assumptions and outcomes anticipated under the proposed FSR and height controls. This includes demonstrating that other standards such as open space, privacy, local character and landscaping would not be compromised.
- Assessment should be carried out to determine any conflicts arising between existing controls and the proposed Housing Reform SEPP and that appropriate interpretation advice or updated be provided.

Increased use of Complying Development (CDC)

It is anticipated that the proposed changes will result in an increase in the use of complying development provisions under the Low-Rise Housing Diversity Code. It is understood that whilst there has been uptake of dual occupancy development under the CDC provision, very few townhouses and manor houses have been issued consent under the same pathway.

There is a general lack of transparency in the CDC process across the community and it raises frequent concerns from the community regarding the limited information being supplied by private certifiers in relation to new development. Notification letters are provided to neighbours; however, no details of the proposed development are typically provided. Even basic details such as drawings and plans for the proposal are not made available from the private certifier. There is no opportunity for residents to provide feedback, even if this would be to highlight particular concerns regarding the characteristics of a site that would be relevant to future construction.

Council is often placed in the position of having to mediate between the concerns of residents and an absent private certifier. The increased application of CDC pathways for development of potentially larger scale and impact is a point of concern and there should be a review of the consultation required with neighbours through the CDC process.

Secondly, the design controls in relation to CDC development need to be reviewed. This Council has observed broad interpretation of existing controls, particularly in relation to basements which is

resulting in excessively large excavation which would not otherwise be supported if lodged as a development application. A common example would be basement rooms labelled as storage but clearly are laid out to become habitable floor space and used as gym, media room or similar.

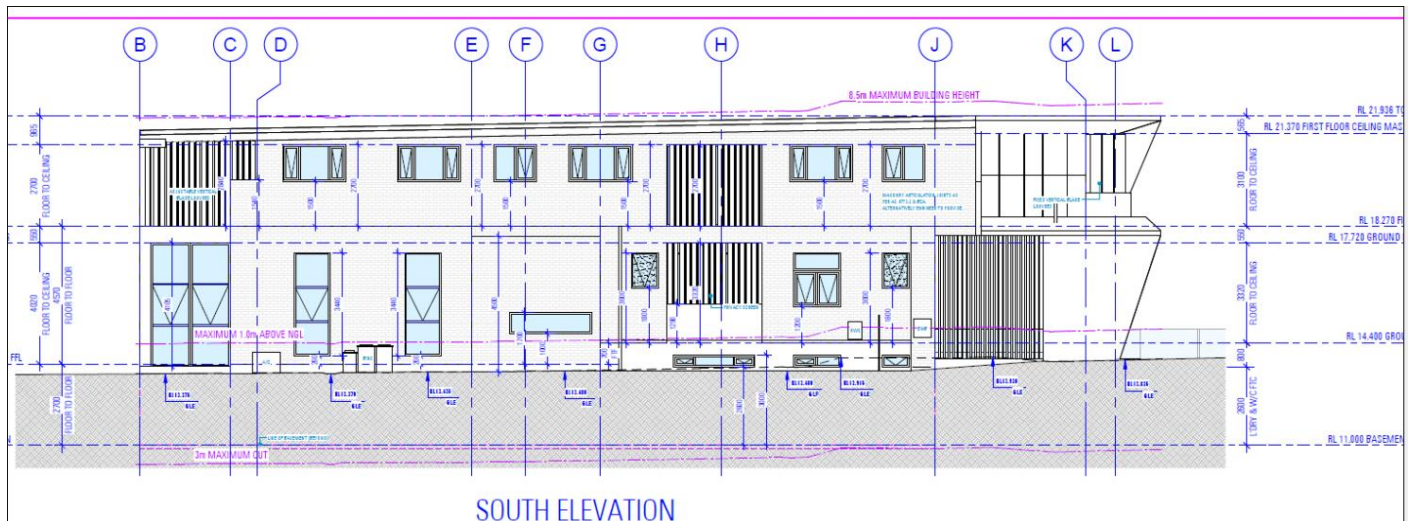


Figure 4. Example of CDC Application demonstrating a three-storey development outcome contrary to intent of CDC controls

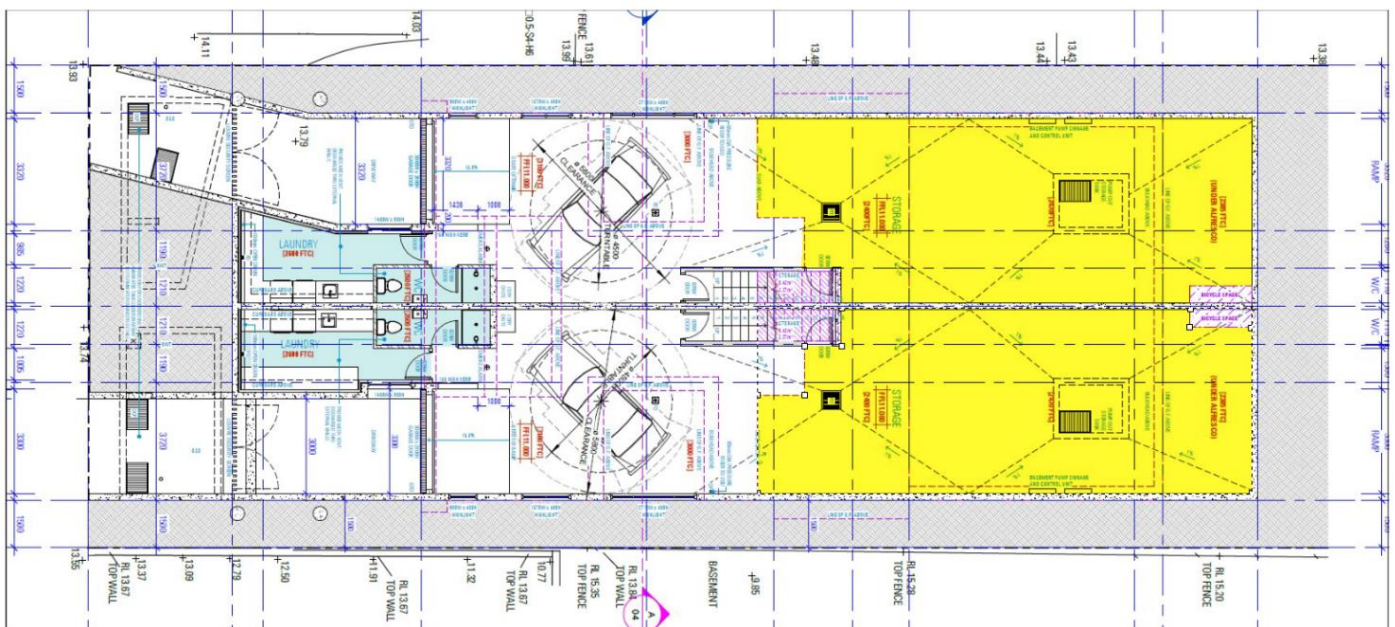


Figure 5. Basement car parking extending beyond the footprint of the dwelling with excessive areas of storage (highlighted in yellow) which will likely be used a quasi-habitable space

Further, existing design controls, also lack provisions to manage integration with the prevailing characteristics of established residential areas. Basic design choices are often heavily reliant upon a

limited material palettes with extensive use of paint finished render. This is often at odds with more traditional brick and tile construction in more established areas.

It is therefore requested that a further review of CDC controls be reviewed as part of the Low-Mid Rise Development policy.

Strathfield Council Recommendations regarding Complying Development

- That a review of existing Complying Development controls in relation to dual occupancy, townhouses and manor houses be undertaken to ensure that consistent and acceptable development outcomes are maintained.
- Improved consultation and notification procedures are implemented to ensure that neighbours are properly informed and notified regarding proposed new development.

State Led Infrastructure Delivery

It is also important to take this opportunity to highlight the need to have clear strategy for the delivery of State led infrastructure. Through our work with community there are reoccurring themes and issues raised which are not matters within the control of local councils. These include:

- General congestion on State-controlled Road networks
- Whilst public transport services are available, there is limited or no passenger capacity at key times.
- Local schools are overcrowded with limited opportunity to expand or provide new schools, particularly within established urban areas.
- Hospitals and access to health care, in general is poor and services are slow or wait times are excessive.

These points are made to reinforce the need for clear infrastructure investment but also so that the community is acutely aware that there is a causal relationship between housing and population growth and that a diminished standard of services is likely to result.

Conclusion

By providing this submission to the Department, it is recognised that there is a shared responsibility to make appropriate provision for housing and population growth. However, this needs to be undertaken in a structured and prioritised way that allow Councils to undertake growth management, long term financial planning and infrastructure delivery.

Making the changes as proposed in the EIE for Low to Mid Rise Housing will jeopardise the ability for Council to plan for future growth in a sustainable and considered way.

Strathfield Council is committed to realising the potential of key growth areas, including the Homebush Accelerated Precinct, announced under the TOD program. This precinct will make a substantial and material contribution to housing supply for Greater Sydney within a location that is well serviced by existing and planned public transport and can be supported by the orderly delivery of new infrastructure.

Strathfield Council has already shown leadership and commitment to the improvement of housing diversity, through the commencement of the Medium Density Housing Strategy. This is to improve house choice across the LGA with a focus on existing low density residential areas and well located medium density areas.

This strategy is aligned with the objectives of the NSW Governments changes to create low and mid-rise housing. However Strathfield Council supports the preparation of a locally specific and contextualised evidence base and responsive design controls.

For this reason, Strathfield Council confirms that it seeks a deferral in the implementation of the planning control changes proposed in the EIE so that we can finalise our Medium Density Housing Strategy that will be informed by a comprehensive community engagement program and analysis of local characteristics. This work, which will be completed in March 2024, should be allowed to progress and be considered by our local community as it represents area specific, evidenced based planning.

Thank you for opportunity to provide this draft submission. I again highlight that the matter will be reported to our ordinary Council meeting for endorsement on the 27th February 2024.

Your sincerely

Michael Mamo
General Manager

ATTACHMENT 1

THE MEDIUM DENSITY HOUSING STRATEGY

Strathfield Council is preparing a Medium Density Housing Strategy (MDHS) and review of the Strathfield Development Control Plan (DCP). This information pack provides an overview of the strategy, how you can provide feedback on Council's Have Your Say page.

WHY DO WE NEED A STRATEGY?

Strathfield Council is exploring opportunities to encourage a wider choice of housing types in the Strathfield area than is currently available. This might mean permitting alternative forms of housing within our existing suburbs, that would allow a variety of choices to

meet the evolving housing needs of our community.

As part of this study, a review is also required to make sure our planning controls reflect the outcomes of Council's strategic planning work, including our Community

Strategic Plan, Local Strategic Planning Statement and other relevant guiding documents. Importantly, this means ensuring that whilst new development might be allowed to occur, it reflects the character and appearance of Strathfield suburbs.

WHAT IS THE AIM OF THE SURVEY



As part of the MDHS, Strathfield Council is seeking to obtain the views of Strathfield residents on housing variety and choice within the community.

Strathfield will be conducting two surveys. A consultation specialist has been engaged to undertake an invited telephone survey. This has been done to ensure a representative cross section of the community will be consulted. A second, open survey, is available via the Strathfield Council website and will be available for an extended period of time. The findings of both surveys will be used to inform the findings of the study.

Topics covered by the medium density housing survey will include:

- Information regarding housing preferences or needs within the community.
- Attitudes toward creating more opportunities for medium density housing across the LGA.
- Views on where would our community like to see more medium housing types occur in the Strathfield area.



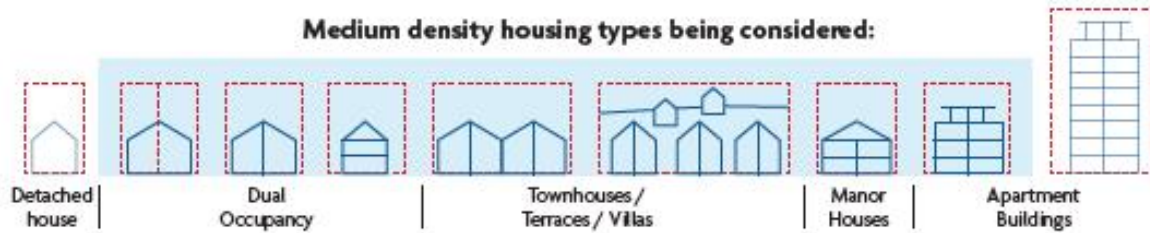


WHAT IS MEDIUM DENSITY HOUSING?

Medium density housing fits between single dwelling houses and large residential flat buildings or high-rise apartment buildings. Sometimes referred to as the 'Missing Middle'.

Medium density housing can be accommodated within a variety of settings and readily adapted to reflect the prevailing character of the existing community. These housing types can also provide suitable alternatives to single detached houses to provide for a diverse range of residents in the Strathfield area.

Medium density housing types being considered:



Dual Occupancy

- 2 storeys, 2 dwellings
- Each may be Torrens titled



Townhouses / Terraces

- 2 - 3 storeys
- Shared basement parking & common areas
- Strata titled



Manor House

- 2 storeys, up to 4 dwellings
- Shared basement parking & common areas
- Strata titled



Low Scale Apartment

- 3 - 6 storeys
- Shared basement parking & common areas
- Strata titled



CREATING GOOD QUALITY HOUSING DIVERSITY

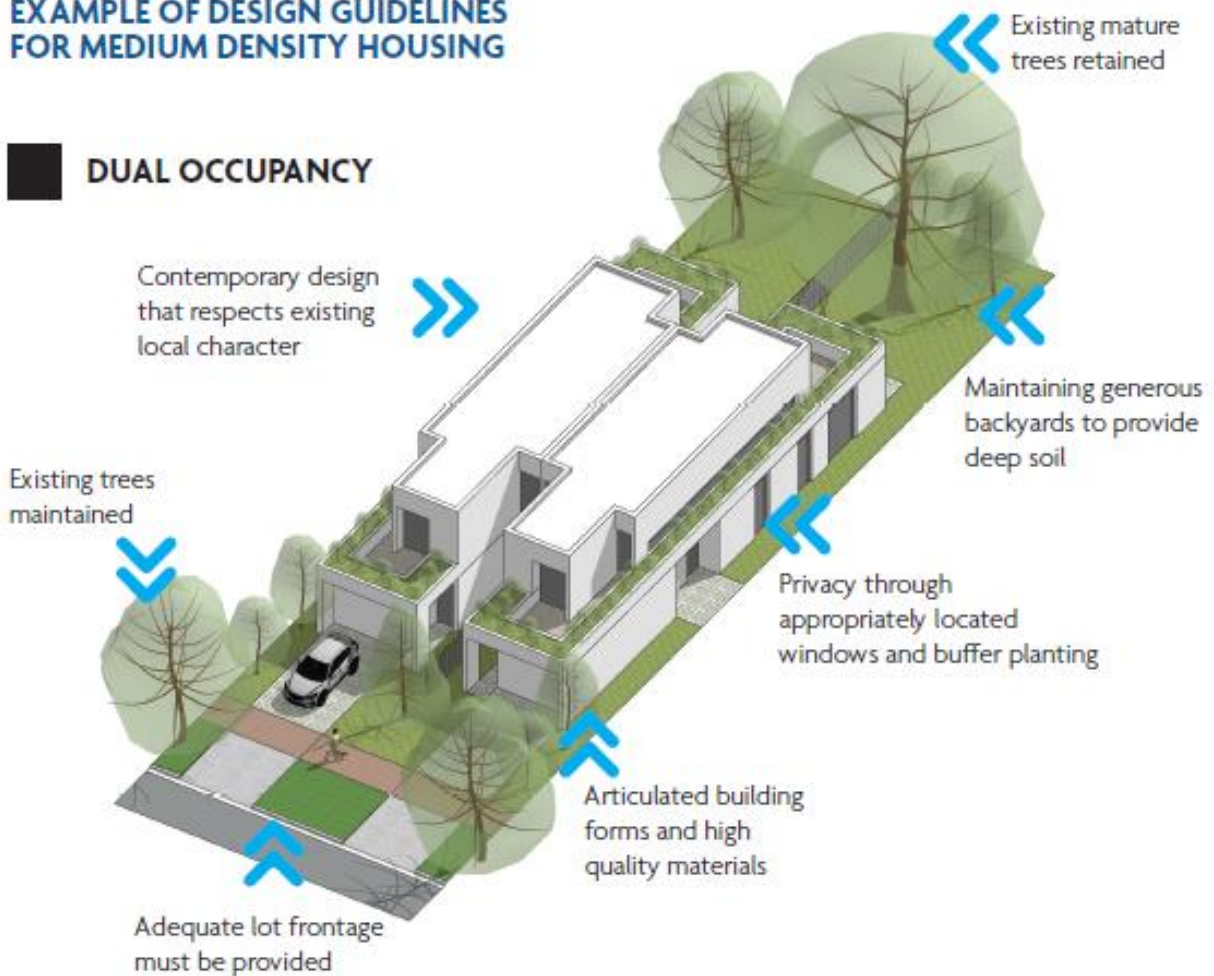
Depending on the findings, the MDHS may recommend changes to the Strathfield Local Environmental Plan (LEP) and Strathfield Development Control Plan (DCP). These changes would help provide a diversity of housing types within certain areas of the Strathfield LGA and introduce additional planning controls to ensure new development is respectful of the existing neighbourhood character.

Key changes may include:

- New land uses within residential zones.
- Changes to certain development standards, such as minimum lot size, building height and floor space ratio.
- New design controls for residential developments, such as minimum lot frontage.

EXAMPLE OF DESIGN GUIDELINES FOR MEDIUM DENSITY HOUSING

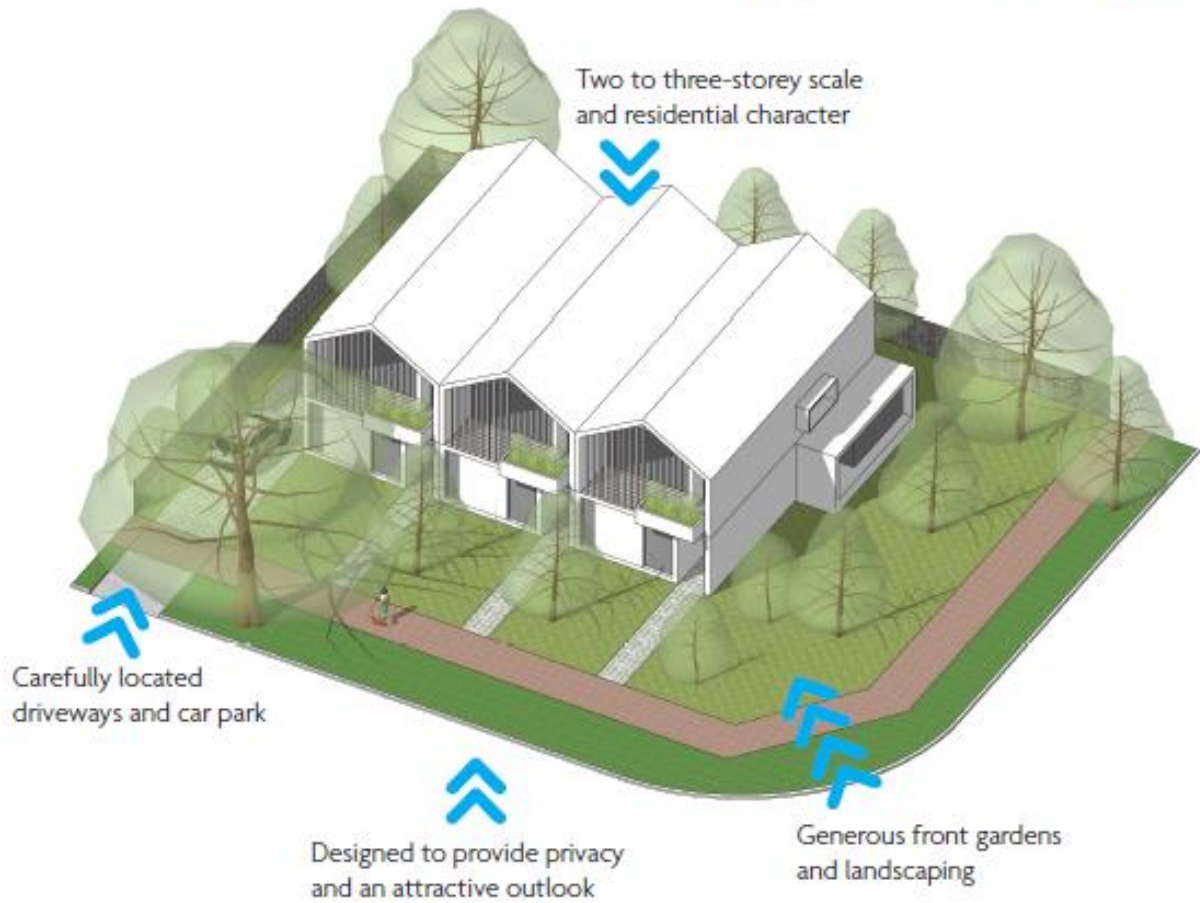
DUAL OCCUPANCY



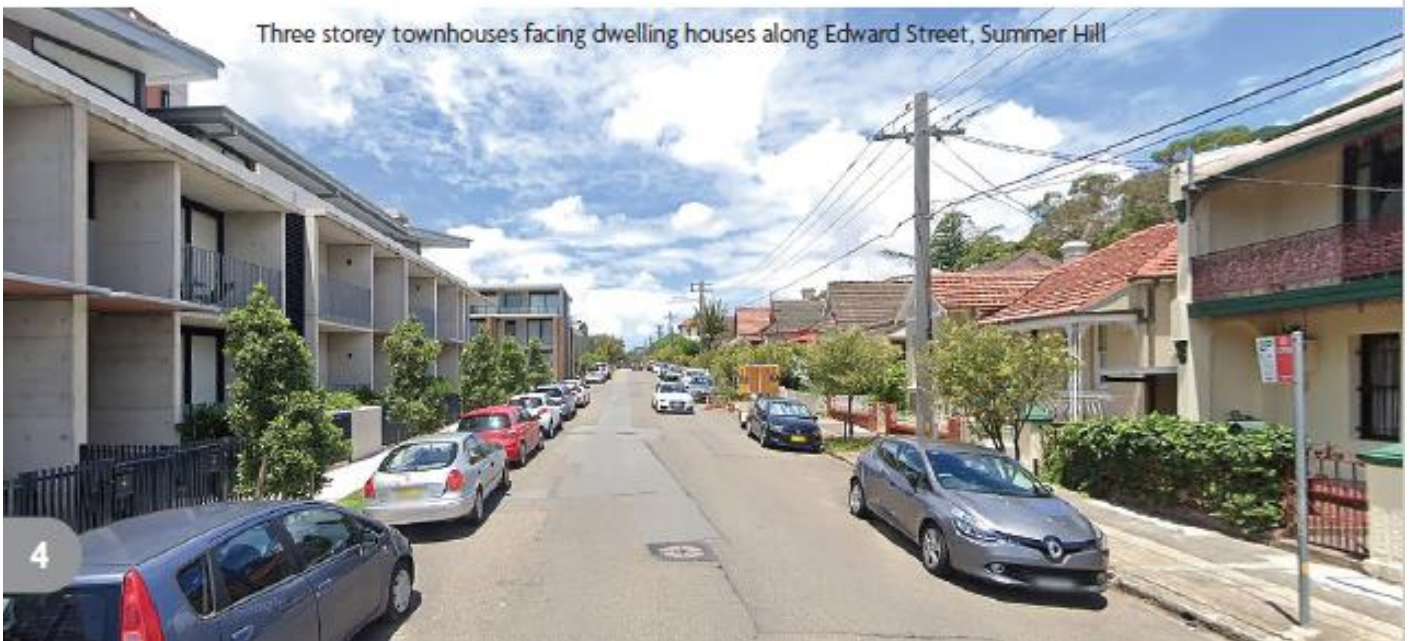
EXAMPLE OF DESIGN GUIDELINES FOR MEDIUM DENSITY HOUSING

TOWNHOUSES

Respectful relationship
with existing neighbours

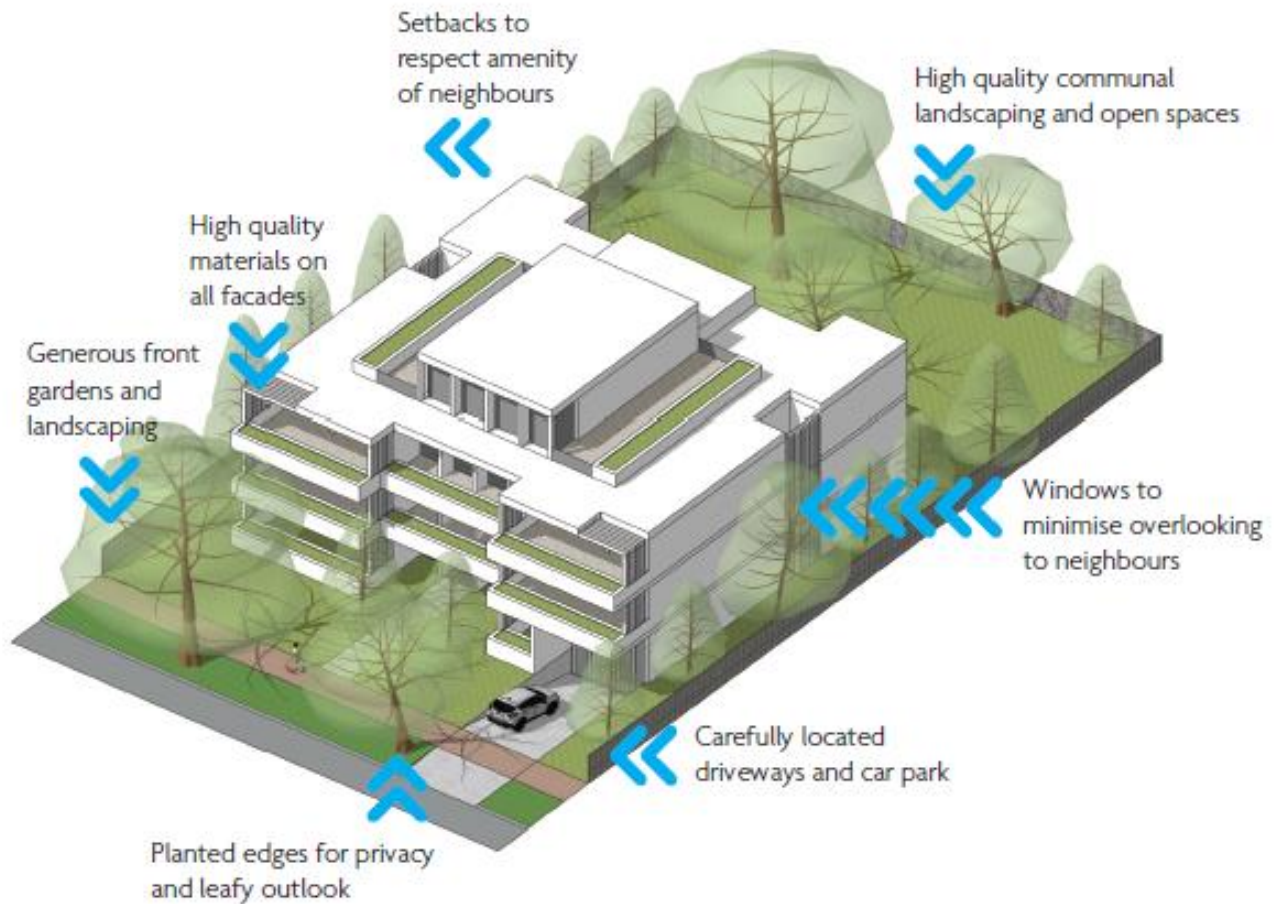


Three storey townhouses facing dwelling houses along Edward Street, Summer Hill



EXAMPLE OF DESIGN GUIDELINES FOR MEDIUM DENSITY HOUSING

LOW SCALE APARTMENT



WHEN COULD CHANGE HAPPEN?

It is well expected that changes will happen incrementally over 10 to 20 years.

Should any sites come forward for development, it will likely occur at a pace linked to the market demand at the time and the willingness of existing residents to sell their homes.



WHAT MAY HOUSING DIVERSITY LOOK LIKE?

A Two storey dual occupancy within existing suburbs



B Two storey townhouses / terraces within existing suburbs



C Low scale apartment living located close to shops and services



WHERE COULD MEDIUM DENSITY HOUSING OCCUR IN STRATHFIELD?

The MDHS has considered several potential scenarios to provide medium density housing within the LGA. Whilst the focus is on providing greater choice of housing, any change must support the existing character of Strathfield's leafy suburbs and heritage conservation areas. Each of these scenarios features changes to current planning controls and Strathfield Council is seeking your thoughts on these scenarios.



1

LOCAL NEIGHBOURHOODS

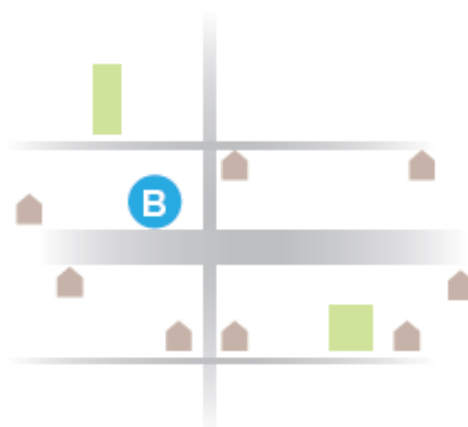
Permitting some medium density housing to occur in all locations across the local government area, subject to meeting minimum lot size requirement and other planning controls.



2

WELL SERVICED CORRIDORS

Permitting medium density housing to occur in locations close to existing major road corridors, for example, Parramatta Road, Liverpool Road and Punchbowl Road.



3

WELL SERVICED CENTRES

Permitting medium density housing to occur only in locations close to existing town centres, neighbourhood centres or public transport stations.





WHAT ARE THE BENEFITS OF MEDIUM DENSITY HOUSING?

Medium density housing types can provide suitable alternatives for a range of residents. By offering some diversity of choice within existing suburbs it allows residents to move into a home that suits their housing needs without necessarily having to leave the area that they know and love.

Some potential benefits of medium density housing include:

- Enabling long-standing residents to downsize from larger single dwellings and stay connected to their local community.
- Providing a more affordable housing choice for families who have outgrown apartment living.
- Delivering new housing options in an appropriate manner that is sympathetic to the character of neighbourhoods.



TIMELINE

AUGUST 2023

Commenced Medium Density Housing Strategy

OCTOBER 2023

Developed housing diversity options

DECEMBER 2023

Community consultation

(WE ARE HERE)

FEBRUARY 2024

Consider community feedback & refine Medium Density Housing Strategy

APRIL 2024

Prepare design guidelines for medium density housing development

JUNE 2024

Council to consider Medium Density Housing Strategy recommendations

HAVE YOUR SAY

HARD COPIES OF DOCUMENTS CAN ALSO BE VIEWED AT:

Council's Customer Service Centre

65 Homebush Road, Strathfield
8:30am – 4:00pm
Monday to Friday
(excluding public holidays)

Strathfield Council Library

65-67 Rochester St, Homebush
During library hours

DROP IN SESSIONS:

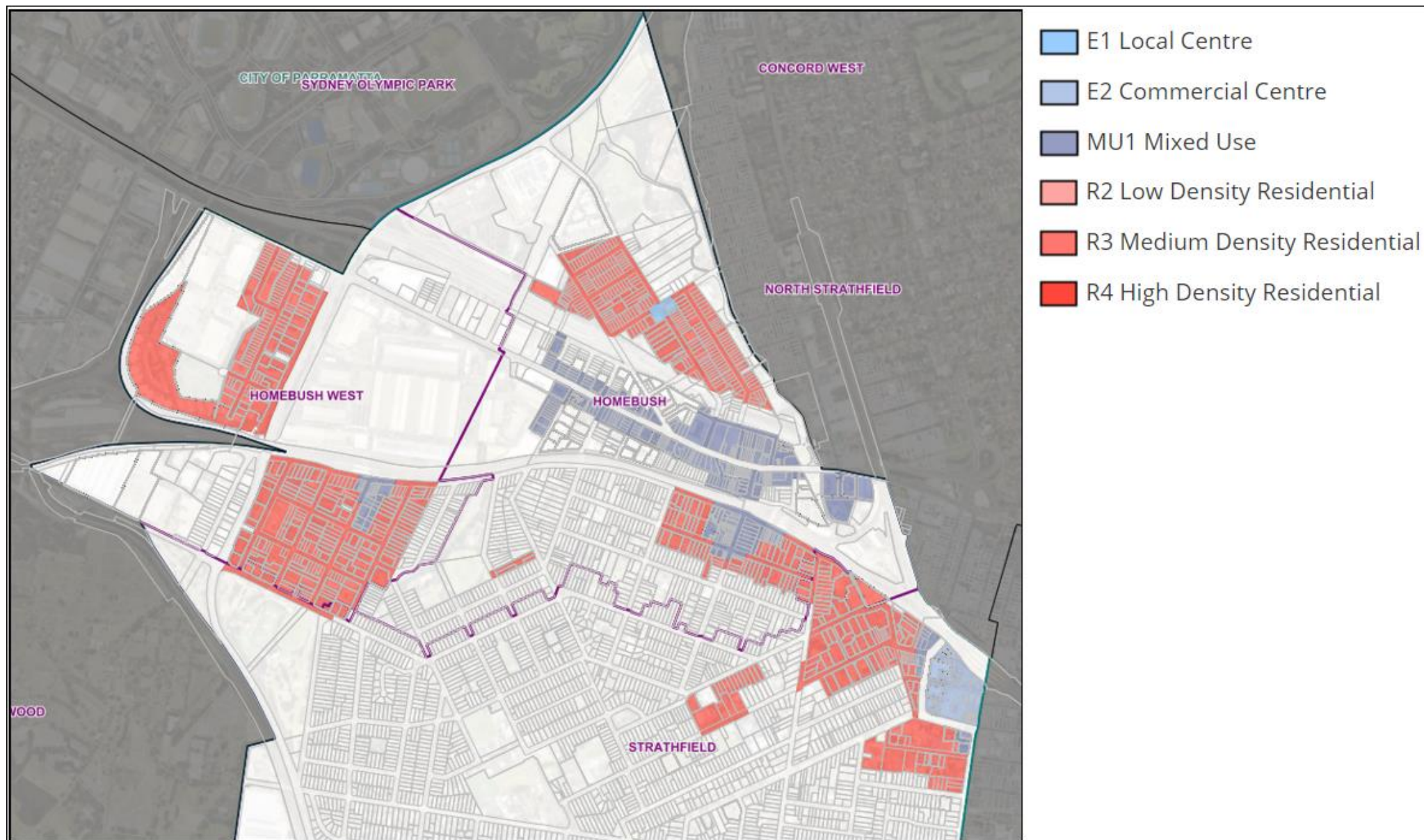
Two drop in sessions will be organised for those who wish to have a chat with Council staff about the MDHS face to face.

Details of these drop in sessions will be made available on Council's website in the coming weeks.

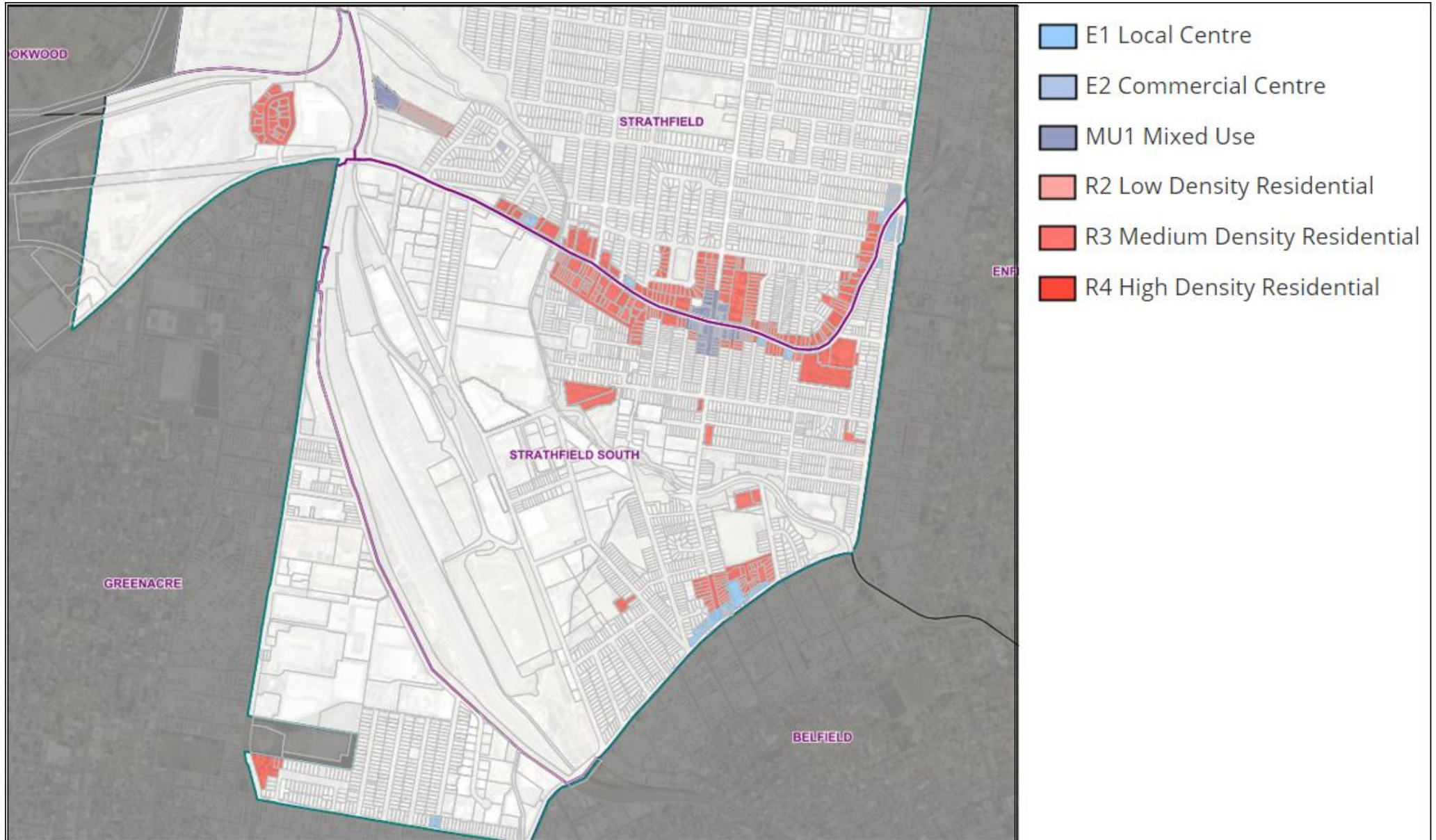
TALK TO A PLANNER

Should you want more information on this project, you are able to speak with a planner by contacting council on 02 9748 9999.

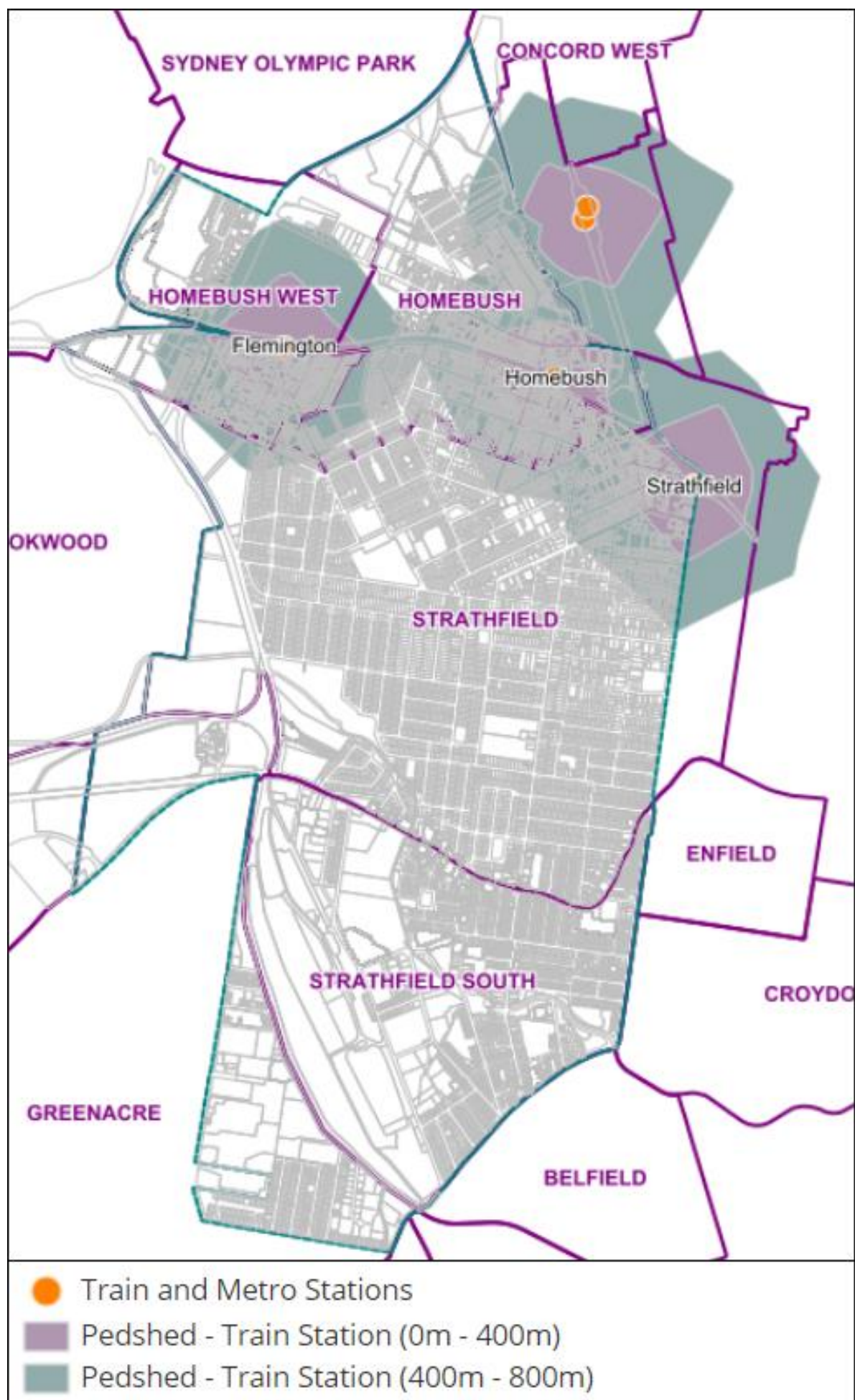
ATTACHMENT 2: Strathfield LGA (north) mid-rise catchment areas



ATTACHMENT 3: Strathfield LGA (south) mid-rise catchment areas



ATTACHMENT 4: Strathfield LGA proposed station precinct catchment mapping



ATTACHMENT 5: Strathfield LGA potential town centre precinct catchments by SLEP 2012 zoning

