

10 March 2021

Our Ref: 20-081 (WW)

General Manager

Canterbury Bankstown Council
Bankstown Civic Centre
66 - 72 Rickard Road
BANKSTOWN NSW 2200

Attention: Ms Amita Maharjan

Dear Ms Maharjan

RE: RESPONSE TO GATEWAY DETERMINATION - CHULLORA MARKETPLACE (353 - 355 WATERLOO ROAD, GREENACRE)

A Gateway Determination (Determination) was issued by the Department of Planning, Industry and Environment (DPIE) on 18 February 2020. The Determination applies to a Planning Proposal (PP) for the Chullora Marketplace (the Marketplace) site located in Greenacre in the Canterbury Bankstown LGA and originally required several amendments to be made in accordance with conditions of the Determination. We responded to the issues raised in a submission dated 1 May 2020. However, the DPIE advised on 12 February 2021 of an amended gateway determination. One of the amendments included a requirement to assess the PP against Council's Affordable Housing Strategy (AHS). This submission addresses this requirement.

ANALYSIS

The vision of Council's AHS is to reduce the level of housing stress experienced by residents across the City of Canterbury-Bankstown by increasing the provision of affordable rental housing.

The AHS identifies Greenacre in the top suburbs by number of households experiencing rental and mortgage stress. This indicates greater housing diversity, along with employment opportunities and other key services need to be delivered in these areas that experience high rental and mortgage stress.

The PP seeks to achieve the latter by increasing housing supply and diversity in proximity to a range of essential services and facilities.

The PP seeks amendments to the Bankstown Local Environmental Plan 2015 to alter the 'flat' 11 metre height limit across the whole site to a variable height limit up to a maximum of 20 metres in the central part of the site. Whilst there are no proposed changes to zoning, permissibility or total maximum FSR on the site, the purpose of the height amendment is to facilitate the delivery of a mix in the type of residential accommodation on the site. Residential flats and shop top housing would become viable within taller buildings. As noted in our letter to Council dated 1 May 2020, the above amendments are critical to ensure housing is feasible, which clearly has not been the case to date, with no housing having been developed on the site under the current controls.

We note that whilst the landowner's PP application sought no change to FSR on the existing shopping centre site, Council saw fit to include a minimum commercial FSR to ensure the objectives of the B2 Local Centre zone were not compromised by excessive residential development at the expense of commercial development. Notwithstanding this, the PP will still enable the site to make a meaningful contribution to housing stock, which should assist in housing affordability within the area.

The AHS report notes “Canterbury Bankstown is committed to ensuring diverse, accessible and affordable housing; focusing new housing in established centres” and lists five overarching principles. A response in relation to how the Marketplace PP responds to each relevant principle follows.

1. Increase the supply of affordable housing in Canterbury Bankstown

ABS (2016) data indicates Greenacre has an inadequate mix of housing typologies. Of occupied private dwellings in Greenacre, 64.5% were detached dwellings, 28.9% were semi-detached, row of terrace houses, townhouses, etc and 5.8% were apartments. These statistics highlight the need for a greater mix of housing types, particularly at higher densities, to meet the demands of current and future residents within the area. The Marketplace PP will facilitate residential development that contributes to meeting both State and local government housing targets, as well as increasing a mix of housing typology.

As indicated, the type of housing facilitated by the increased height proposed in parts of the site will be in the form of shop top housing/flats above commercial premises. Statistics from realestate.com.au indicate that the current median dwelling house price in Greenacre is \$961,000 compared to a median unit price of \$659,000. The median rental prices for dwelling houses is \$550 per week compared to \$400 per week for units. This demonstrates that the proposed units on the site, which will add to the very limited supply of units within the area, will be significantly more affordable than the existing dwelling houses that predominate in the area.

2. Locate affordable housing near established centres to allow residents better access to transport, jobs and services

The Chullora Marketplace is a local centre providing services for residents, businesses and schools within Greenacre and the wider community. As indicated above, whilst residential accommodation has been permitted on the site under the current zone, it has not been viable to develop. This PP will enable a typology of residential development on the site that should be viable and at a lower price point than typical housing in area (as discussed above). The aim of the PP is to achieve a true mixed use town centre where on-site residents reap the benefits of the services and jobs provided by the commercial operations literally at their door. In a symbiotic fashion, this extra ‘captive’ demand should assist the ongoing viability to the commercial premises on the site. Bus services along Waterloo Road also provide residents on the site with access to a wide array of other services, facilities and employment opportunities in the immediate and wider area.

3. Focus on alleviating housing stress for very low and low income households and key workers

Council’s draft AHS Background Report notes a very low-income household could only afford 13% of one-bedroom units and a low-income household could afford 83% of two-bedroom units. An element of alleviating housing stress is to provide a mix of housing typologies. The Marketplace PP provides the opportunity, that has not been viable under current planning controls, for a mix of dwelling types and sizes to be developed within an established centre at a lower price point than typically available in the local area.

4. Establish clear process for delivery and dedication of affordable housing dwellings

5. Establish an internal framework for the management of affordable housing dwellings

Principles 4 and 5 involve Council establishing processes and management frameworks that are not relevant to the current PP.

CONCLUSION

The conclusion of our assessment is that the PP is highly consistent with Council's Draft AHS as follows:

- It will enhance the viability of residential accommodation on a site where it has not been viable previously despite its permissibility.
- It will add to dwelling stock to assist in meeting demand and place downward pressure on local prices.
- It will facilitate development of higher density, smaller dwellings in the form of units, of which there is very limited supply in the local area, thus increasing housing choice.
- Median unit prices are substantially lower than dwelling houses, which are the predominant housing form in the local area, thus adding to the supply of affordable housing.
- The PP facilitates a mixed use centre, which will provide future residents with shopping and other services at their door. The centre has access to public bus services on Waterloo Road and therefore residents will have excellent access to a wide range of services, facilities and employment opportunities.

Yours Sincerely,



David Ryan
Executive Director