



# DRAFT LOCAL HOUSING STRATEGY

COMMUNITY ENGAGEMENT REPORT  
JULY 2022

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## Statement of recognition of Penrith City's Aboriginal and Torres Strait Islander cultural heritage

Council values the unique status of Aboriginal people as the original owners and custodians of the lands and waters, including the land and waters of Penrith City.

Council values the unique status of Torres Strait Islander people as the original owners and custodians of the Torres Strait Islands and surrounding waters.

We work together for a united Australia and City that respects this land of ours, that values the diversity of Aboriginal and Torres Strait Islander cultural heritage and provides justice and equity for all.

### About this report

This document is the Community Engagement Report relating to Penrith City Council's draft Local Housing Strategy which was publicly exhibited from 5 April to 17 May 2022.

### Disclaimer

While every effort has been taken to make sure the information in this document at the time of publication is current and accurate, information is constantly changing and may become out of date or inaccurate. In circumstances where loss, damage or injury is possible, please ensure you have accurate data. Council denies liability for any loss, damage or injury resulting from any person relying on information obtained by or through this document.

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## Executive summary

This report outlines the feedback received in response to public exhibition of the draft Local Housing Strategy. The draft Local Housing Strategy provides a strategic approach to managing housing and population growth over a 20-year period.

The public exhibition process was guided by Council's Community Engagement Strategy. The purpose of the public exhibition was to give the community an opportunity to provide feedback. Community feedback plays an important role in establishing Council's vision and directions for the Penrith Local Government Area (LGA). The public exhibition activities were held between 5 April and 17 May 2022.

The public exhibition activities attracted over 65 responses across various channels including:

- 16 formal written letter or email submissions
- 25 hardcopy feedback forms completed at Drop-in Sessions
- 24 online surveys completed

A majority of responses (64%) were received from property owners, with a broad representation of the community in terms of age and gender and included people with a disability, Aboriginal and Torres Strait Islander people, and people from culturally and linguistically diverse backgrounds.

When asked "**what are the top three areas for improvement that Council could make to residential areas**", the most frequently reported responses were:

- Housing affordability (18 respondents or 37%)
- Prevent overdevelopment (12 respondents or 24%)
- More tree planting (12 respondents or 24%)
- Flood planning (11 respondents or 22%)

When asked about **the draft Local Housing Strategy's nine broad objectives**, the most respondents reported that their highest priority was:

- Delivery of additional dwellings to meet a rapidly growing population (29%)
- Sustainable neighbourhoods with improved environmental performance and high-quality public space (21%)
- Delivering affordable housing for low to moderate income groups (13%)

The online survey and hardcopy feedback forms provided respondents with an opportunity to provide additional comments. These freeform comments were grouped into broad themes and the most common emerging themes were:

- The need for high-quality buildings, good design, and development done well.
- The need for better access to jobs and reducing the time residents spend travelling to work.
- The potential for Penrith City Centre to be revitalised, and for it to be the location of higher density development.
- The need to address the heat island effect.

- Issues relating to the diversity of housing types in Penrith LGA, and the importance of meeting the housing needs of the existing and growing community.

General support was expressed in most of the formal written submissions, with several commending the Council on the strategic directions of the draft Local Housing Strategy with comments and or suggested recommendations to the Strategy to strengthen the document.

The issues raised in feedback received during the public exhibition period of the draft Local Housing Strategy will be incorporated into an amended Strategy document where appropriate. This finalised Strategy will be reported to Council seeking endorsement.

## 1. Introduction

The draft Local Housing Strategy provides a strategic approach to managing housing and population growth over a 20-year period.

The draft Local Housing Strategy forms one component of the Places of Penrith strategic planning framework, which will establish the vision and directions for the Penrith LGA. Other components of Places of Penrith, the Employment Lands Strategy and the Green Grid Strategy, were adopted in 2021. A further component, the draft Rural Lands Strategy, has been exhibited concurrently with the draft Local Housing Strategy as they have a complementary relationship aimed at focussing residential development in urban areas, to protect and enhance the role of rural areas. A fifth component, the Corridors and Centres Strategy, is underway and will continue to build on the themes of the community engagement undertaken for the draft Local Housing Strategy.

The Local Housing Strategy is identified as an immediate action in Council's Local Strategic Planning Statement (LSPS), Action 3.1 'Prepare a Local Housing Strategy'. Preparation of a Local Housing Strategy is a requirement under the Greater Sydney Region and District Plans.

The draft Local Housing Strategy was placed on public exhibition from 5 April to 17 May 2022. Community members and stakeholders were given an opportunity to provide comment. An updated Local Housing Strategy will be prepared addressing issues raised during the public exhibition period. This report outlines the community response and feedback received in relation to the draft Local Housing Strategy.

## 2. Public exhibition and engagement activities

The draft Local Housing Strategy was publicly exhibited alongside the draft Rural Lands Strategy. Both strategies are key components of Places of Penrith – Council's suite of city-shaping strategies. The public exhibition was held between 5 April to 17 May 2022. The six week exhibition period provided the community with an opportunity to provide feedback and play an important role in establishing the vision and directions for the Penrith LGA.

The public exhibition was advertised through a variety of channels:

- Council's Your Say Penrith website (and linked to from Council's main website homepage)
- Council's social media pages (Facebook, LinkedIn and Instagram)
- Direct email notifications to relevant NSW Government agencies and stakeholder organisations
- The Mayoral Column (8 April 2022) in *The Western Weekender*.

### Communication channels

Stakeholders and the community were invited to provide feedback through a variety of channels including:

- An online survey on the Your Say Penrith website
- A hard-copy feedback form made available during Community Drop-in Sessions
- Community Drop-in Sessions

- Written submissions emailed/posted to Council.
- Council’s social media posts (Facebook, LinkedIn, Instagram)

## Direct engagement

Council staff attended three “Village Café” community support events and three further locations to speak to the community about the draft Local Housing Strategy along with the draft Rural Lands Strategy. Community Drop-in Sessions were as follows:

- Village Café, Kingswood (Thursday, 14 April 2022, 9.30am-11.30am)
- Village Café, North St Marys (Thursday, 21 April 2022, 9.30am-11.30am)
- Community Drop-in Session, Mulgoa Hall (Tuesday, 26 April 2022, 6pm-8pm)
- Village Café, Llandilo (Thursday, 28 April 2022, 9.30am-11.30am)
- Community Drop-in Session, Penrith Library Theatre (Thursday, 28 April 2022, 6pm-8pm)
- Community Drop-in Session, Berkshire Park Hall (Thursday, 12 May 2022, 5pm-7pm)



Figures 1 & 2: Drop-in Session at Council Village Café North St Marys held on 21 April 2022



Figures 3 & 4: Drop-in Session at Mulgoa Hall held on 26 April 2022

### 3. Engagement response

The public exhibition activities attracted **over 64 responses** across the various channels. The draft Local Housing Strategy Your Say Penrith webpage attracted 572 page views, 373 visitors to the page, and 12 downloads of the Local Housing Strategy, resulting in:

- The 'Your Say Penrith' online survey attracting a total of **24 responses** from residents, workers, property owners and visitors.
- The Community Drop-in Sessions receiving **25 hard-copy feedback form responses** from residents, workers, property owners and visitors.
- **16 formal written submissions** being received including from community groups and NSW Government agencies. A summary of these formal submissions is provided at Appendix 1.

The majority of respondents (48%) visited the Your Say Penrith webpage directly, 29% were referred to the Your Say Penrith page from the Council website, 12% were referred from social media, while 12% used a search engine.

#### Social Media

- Council published **7 social media posts** about the draft Local Housing Strategy along with the draft Rural Lands Strategy on its Facebook, LinkedIn and Instagram pages. The social media posts had a reach of 15,976, generating 121 reactions, and 140 engagements.

#### 3.1 Formal written submissions

There were 16 formal written submissions from stakeholders and community members providing comment by way of letters or emails. These comments were acknowledged and considered along with the other feedback received.

Formal submissions were received from:

- 5 NSW Government agencies/corporations:
  - NSW Environmental Protection Authority (EPA)
  - Department of Regional NSW – Mining, Exploration and Geoscience Team
  - Sydney Water
  - Transport for NSW (TfNSW)
  - School Infrastructure NSW
- 3 community groups or land councils:
  - Friends of Fernhill and Mulgoa Valley (FFMV)
  - Berkshire Park & Llandilo Community Group
  - Design Collaborative Pty Ltd (on behalf of Deerubbin Local Aboriginal Land Council (LALC))
- 2 industry organisations:
  - Urban Development Institute of Australia (UDIA)
  - Stockland (on behalf of Western Sydney University)



- 6 private individuals (or their representatives).

The detailed issues raised in these formal submissions and responses are discussed in Appendix A.

In summary, the formal submissions followed several broad themes:

### **Stakeholder nomination of specific sites for future housing**

Several submitters identified specific sites that they believed should be nominated in the Local Housing Strategy for future housing. For instance, the Berkshire Park & Llandilo Community Group, and one private individual associated with the Group, advocated for the rezoning of the rural areas of Berkshire Park and Llandilo to allow more housing development. The Deerubbin LALC identified the potential for their landholdings to deliver housing, especially low density infill housing.

Stockland nominated the Western Sydney University (WSU) Werrington site for a masterplanned housing estate. Stockland seeks further analysis and structure planning by Council to facilitate this shift to more housing. Similarly, UDIA recommended that Council investigate further Urban Investigation Areas. UDIA specifically suggested The Northern Road corridor and the Rapid Bus corridor for future housing. One landowner representative nominated a precinct around Kings Hill Road in Mulgoa on behalf of its clients. Meanwhile, another landowner representative nominated a precinct in Wallacia on behalf of its clients, especially citing its potential to provide executive housing.

### **Identification of risks to housing delivery**

Several submitter's comments picked up on the various risks posed to housing delivery. The EPA identified the need to address noise, air quality and waste management issues. The EPA also identified the importance of avoiding land use conflicts. The Department of Regional NSW identified the presence of mineral exploration licenses that might affect future housing release areas.

TfNSW identified risks associated with flooding, especially flood evacuation constraints. TfNSW also mentioned infrastructure provision being critical to housing delivery. Similarly, UDIA identified that the uncoordinated delivery of infrastructure can lead to development delays and impacts on a developer's return on investment. One private individual raised the concern with respect to property speculation and land banking leaving sites vacant. That individual identified the need for Council to incentivise development. Lastly, one landowner representative argued that the existing and future housing release areas risk pushing out small businesses and agri-businesses who relied on these larger rural properties. They use this argument to propose the rezoning of further rural land to smaller lots to accommodate the displaced businesses.

### **Stakeholders desire to work closely with Council**

Six submitters expressly wish to work more collaboratively with Council, be recognised as a stakeholder, or meet with Council. For instance, Sydney Water suggests working collaboratively and obtaining regular housing forecasting information from Council. School Infrastructure NSW indicate that working with Council is important in planning for school infrastructure and forecasting enrolments. The Deerubbin LALC suggests that it has the potential to partner with Council in the delivery of affordable housing on its landholdings. Deerubbin LALC also asks to be added to the list of stakeholders in the Strategy document. Similarly, UDIA recommends that Landcom be added to the list of stakeholders. UDIA comment generally on the desire to work closely with Council, and suggests that Council

should collaborate with the development industry. One private individual seeks a meeting with Council to progress their proposal to rezone areas of Berkshire Park and Llandilo. A landowner representative, on behalf of their private client in Wallacia, also suggests that Council engage with the landowners to facilitate residential development of that precinct.

### **The importance of design quality and responding to environmental issues**

Several submissions asserted their ability to deliver quality outcomes should Council allow residential development upon their (or their representative's) landholdings. However, three submitters - who did not seem to hold development interests - expressly identified the need for high-quality buildings, as well as the ability of good design and planning to resolve adverse impacts associated with poor development. The Friends of Fernhill and Mulgoa Valley (FFMV) advocated for high-quality development, that appropriately responds to site conditions. FFMV also argued for the need to transition or buffer the urban and rural boundary to ensure that the character, environment and rural values are protected. FFMV expressly advocated for the protection of rural areas from urban expansion, ensuring that the rural attraction of the Mulgoa Valley is maintained.

One private individual argued for new residential development to have a long design life, thereby avoiding the "tired" appearance of older housing stock. One other private individual argued for new development to find solutions to amenity issues like traffic congestion and urban heat. Both these private individuals raised concerns with respect to vacant residential properties. Environmental concerns featured in the comments with both FFMV and one private individual identifying the need for buildings to be resilient to a changing climate and mitigate urban heat.

### **The importance of meeting community needs, especially housing affordability**

Two submissions asserted the importance of meeting our community's needs. A landowner representative argues that high density development is not what people want, and consequently, Council should be supporting land being released for low density housing around Mulgoa.

The other submission, from a private individual, questions whether the abundance of medium density and high density housing is meeting our community's wants and needs. In particular, this submitter believes that Council is not addressing housing affordability for families. They lament the long waiting lists for social and affordable housing. They argue that the high number of boarding houses and student housing that are vacant in Kingswood are not helping families struggling to find housing. This submitter also claims that Council is not consulting its community.

### **The importance of evidence to support planning and decision making**

Three of the submissions identify the importance of evidence-based planning. Sydney Water advocate for detailed housing forecasts to help inform their servicing of new and growing residential areas. Similarly, TfNSW argue for housing delivery to respond to flood studies and modelling, as well as for traffic assessments to be carried out ahead of development. School Infrastructure NSW also identify the need for a thorough understanding of proposed development within an LGA to improve the analysis of school demand. All these NSW Government agencies have specific referral requirements to ensure that they are provided with the information they may need to inform decisions.

## The need to ensure Strategies are up-to-date and relevant

One submission from a private individual argues that Council’s planning strategies take too long. They claim that the documents are out-of-date as soon as they are finalised.

Meanwhile, the submission by Stockland wants to see Council’s Employment Lands Strategy (adopted 2021) reviewed in an effort to clarify employment and housing potential at the WSU Werrington site. Stockland also support the preparation by Council of a Corridors and Centres Strategy and structure planning for their client’s precinct.

One landowner representative argues that a hard rural boundary will be a constraint on meeting future housing supply needs. The submitter argues that Council’s Local Housing Strategy is only considering Planning Proposals “*in hand*”, and that such an approach is “*short-sighted*”.

The matters raised in formal submissions and Council’s response to these are addressed in detail in Appendix A.

## 3.2 Community Drop-in Sessions – Hard-copy feedback forms

### Who we heard from: Respondent profile

As part of the engagement activities, Council staff visited Council’s three “Village Cafés” at Kingswood (14 April), North St Marys (21 April) and Llandilo (28 April) along with three dedicated drop-in sessions held at Mulgoa Hall (26 April), Penrith City Council Library Theatre (28 April), and Berkshire Park Hall (12 May) to speak to the community about the draft Local Housing Strategy and the draft Rural Lands Strategy.

Drop-in Sessions received a total of **25 feedback form responses** from residents, property owners and visitors throughout the direct engagement period for the draft Local Housing Strategy.

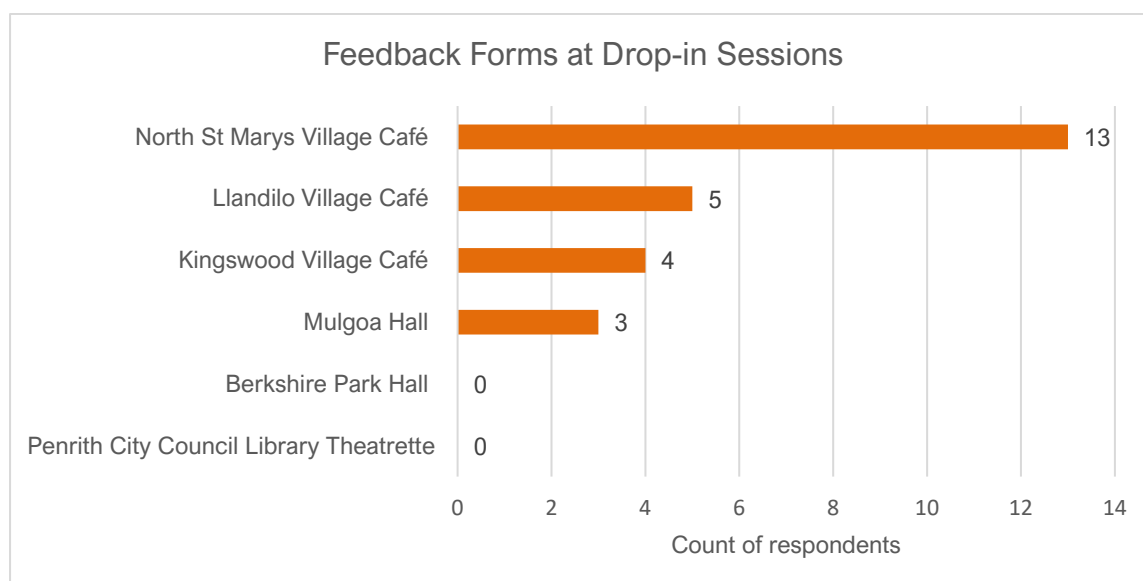


Figure 5: Feedback Form respondents at the Drop-in Sessions

Relatively few feedback forms were received at the Drop-in Sessions within rural locations since attendees at these sessions tended to complete the separate feedback form which related specifically to the draft Rural Lands Strategy.

## Association with Penrith LGA

Nineteen respondents indicated their relationship to the Penrith LGA, while six respondents skipped this question.

The majority of the survey respondents identified as 'a property owner in the Penrith LGA', comprising 53% of responses, while 26% of the respondents identify as 'a renter in the Penrith LGA'.

Only 5% of the respondents identify as 'a worker in the Penrith LGA', while 16% of respondents were 'visitor to the Penrith LGA'.

There were no survey respondents identifying as a 'business-owner' or a 'student' in the Penrith LGA.

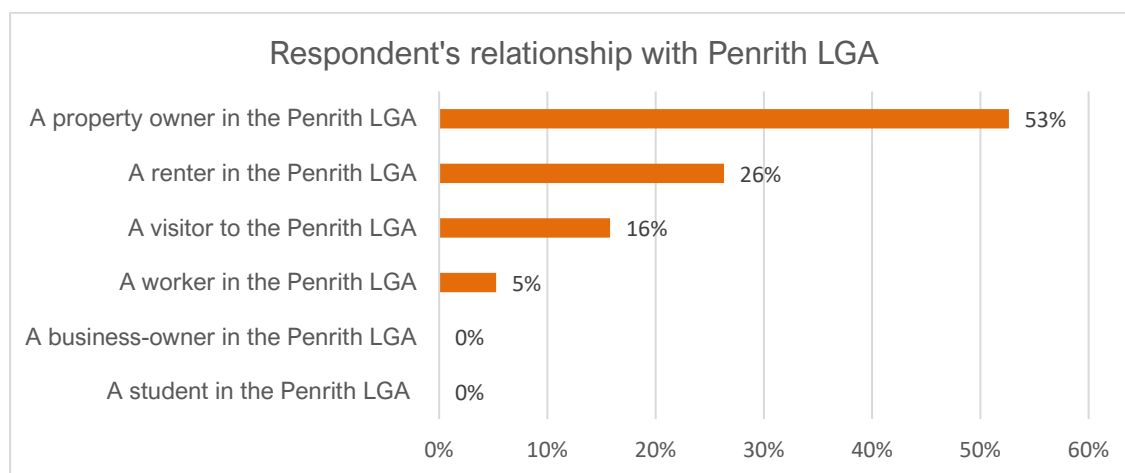


Figure 6: Survey respondent's relationship with Penrith LGA

## Age group

Almost half of the total respondents were aged 65 or above, comprising 52% (11) of responses.

Only 14% (3) of the respondents were aged between 25-44 years old, while 32% (7) of the respondents were aged between 45-64 years old.

There were no survey respondents identifying between 18-24 years old age group or under 18 age group.

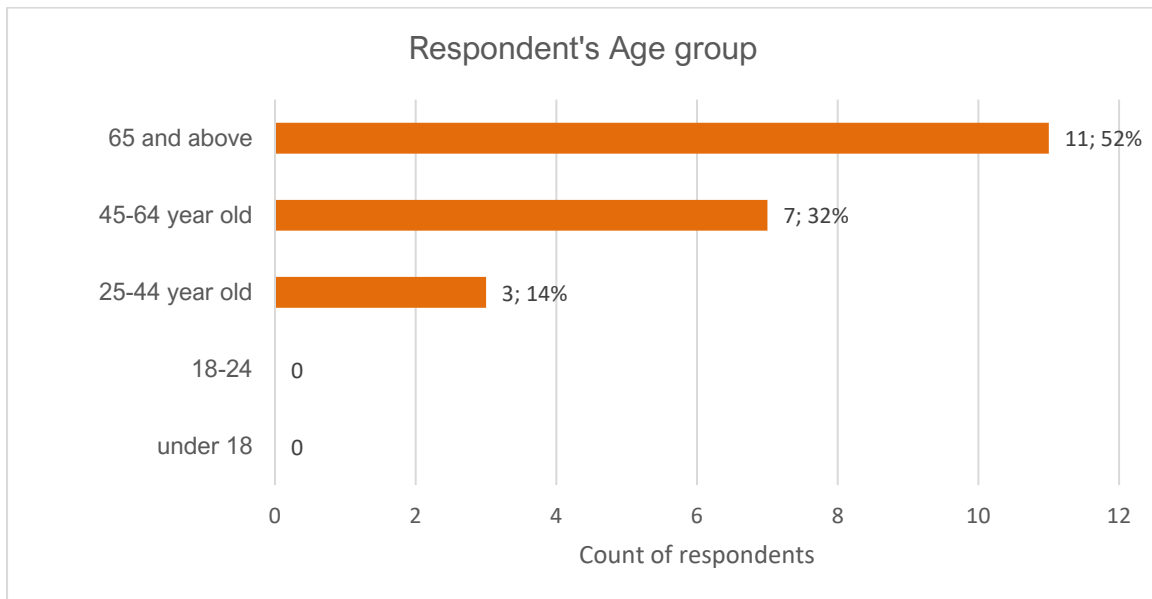


Figure 7: Survey respondent's participation by age group

## What are the top three area for improvement that council could make to residential areas?

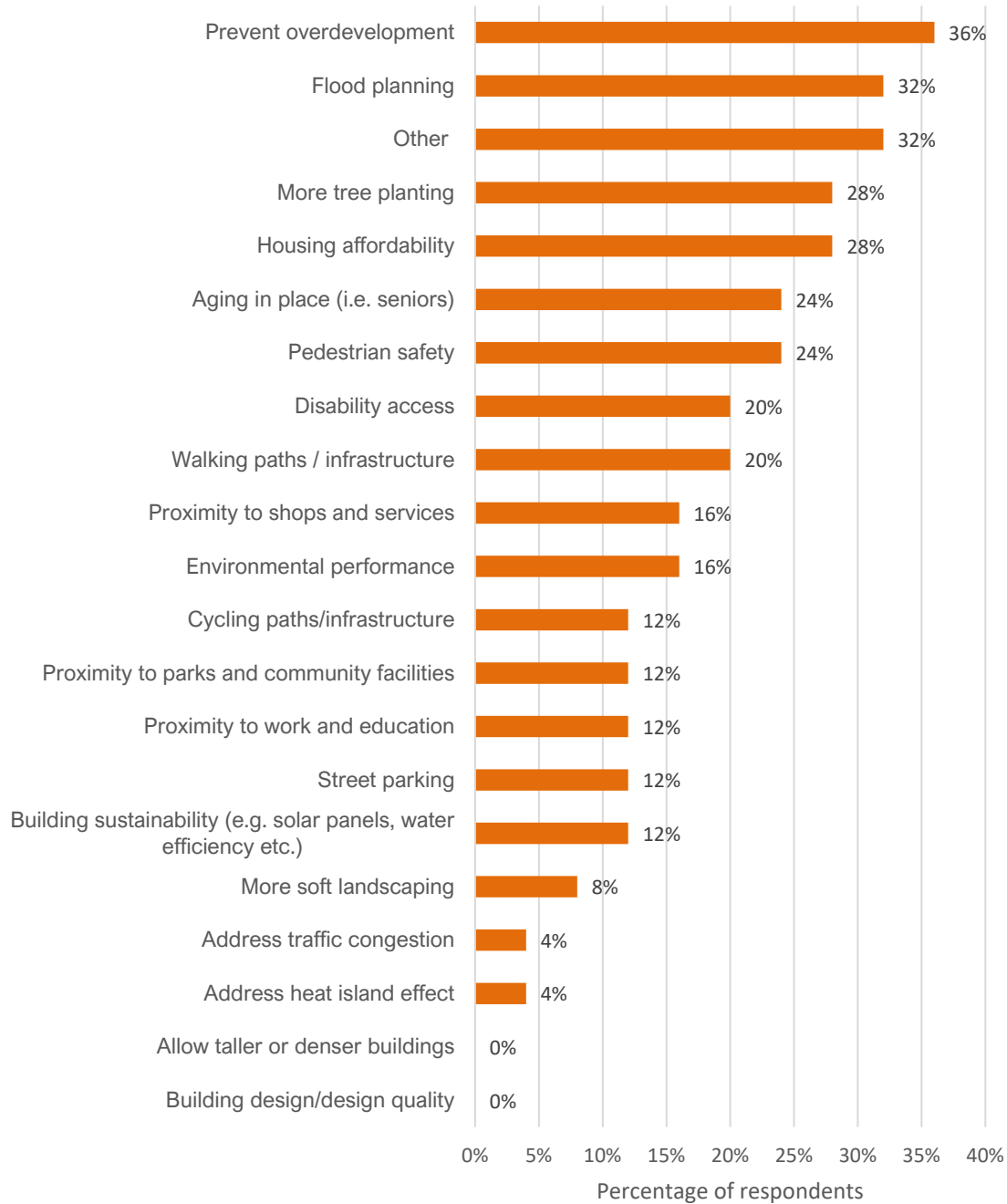
The hard-copy feedback form asked respondents to select three areas for improvement from a set list of available responses. This same question was posed in the online survey on the Your Say website (results given separately below in Section 3.3).

- The need to 'prevent overdevelopment' came through strongly in the survey results.
- The matter of 'flood planning' was ranked second at 32%.

Where respondents selected the 'other' option, the feedback form asked them to write their own responses. The areas for improvement given as responses under the 'other' category included:

- *"Programs that encourage community connection"*
- *"Green growth on rooftops and vertical [gardens]"*
- *"Solar panels"*
- *"Stop tree removal"*
- *"Garden maintenance and preservation"*
- *"Buses for transportation"*
- *"Minimise light pollution"* [in relation to Mulgoa].

### What are the top three areas for improvement that Council could make to residential areas?



### 3.3 Your Say Penrith website – Online surveys

The online survey attracted **24 responses** from residents, property owners, workers and visitors.

#### Place of residence

Twenty respondents provided their place of residence, while four respondents skipped this question.

The majority of survey respondents identified as residents of Penrith LGA. Survey respondents who live in the Penrith LGA spanned across three wards, with the majority (35%) residing in the 2750 and 2747 post code areas.

There were no survey respondents identifying from Badgerys Creek (2555), Agnes Banks, Londonderry (2753) or Berkshire Park (2765).

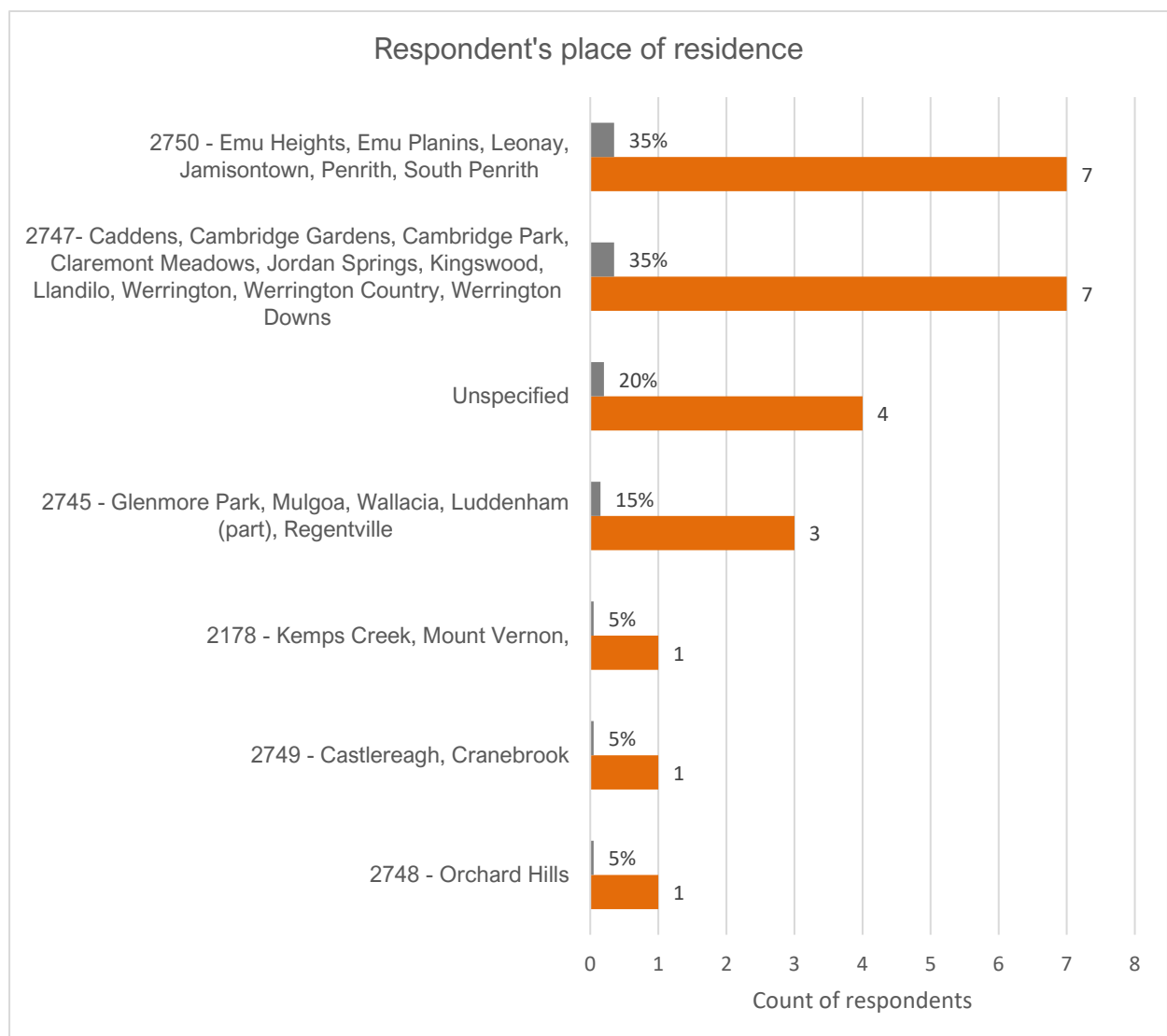


Figure 8: Survey respondents by residential postcode or suburbs

## Association with Penrith LGA

The majority of the survey respondents identified as 'an owner-occupier in the Penrith LGA', comprising 74% of responses, while 22% of the respondents identify as 'a property investor in the Penrith LGA'.

Only 4% of the respondents identify as 'a business owner in the Penrith LGA', while 9% of respondents were 'renter in the Penrith LGA'. 13% identified as 'a young person or student' in the Penrith LGA. It should be noted that respondents could select multiple categories.

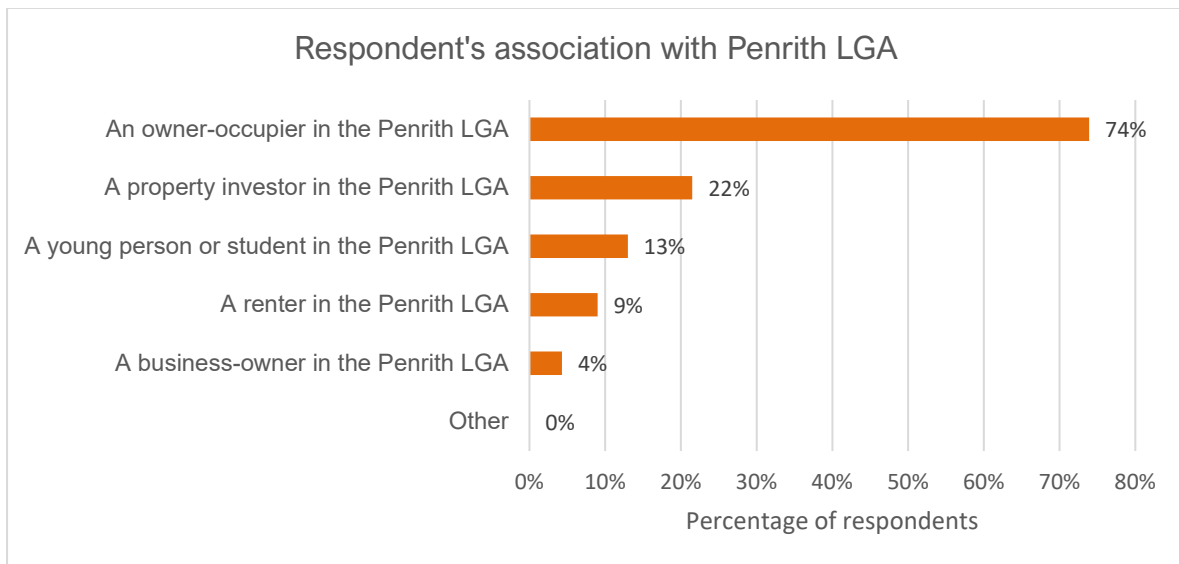


Figure 9: Survey respondent's association with Penrith LGA

## Age and gender groups

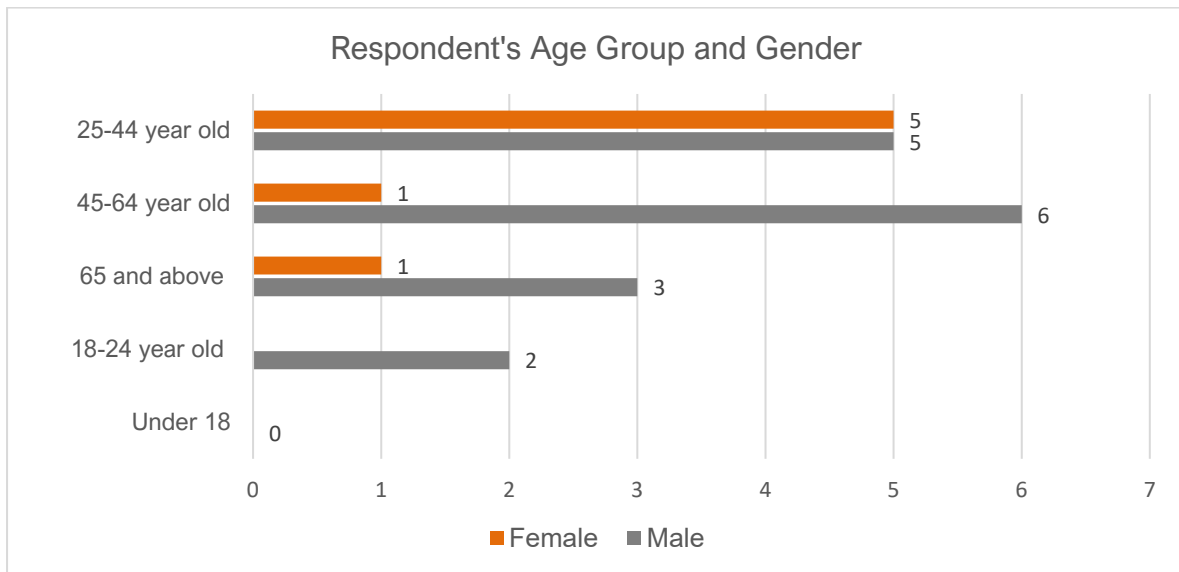
Males comprised 71% (16) of the respondents, and almost half of the total respondents were aged between 45-64 years old.

Women comprised 30% (7) of the respondents, and more than half of the total respondents were aged between 25-44 years old.

Only 9% (2) of the respondent was aged between 18-24 years old, while 43% (10) of respondents were aged between 25-44 years old.

There were no survey respondents aged under 18 years of age.





**Figure 10: Survey respondent's participation by gender and age groups**

### Cultural and linguistic diversity

4% of respondents identify as people of Aboriginal origin.

10% of the respondents identify as a person from a culturally and linguistically diverse background. Some of these described two different cultural backgrounds such as Maltese and Hindi.

Over 90% of the respondents spoke English as their first language at home.

### What are the top three areas for improvement that Council could make to residential areas?

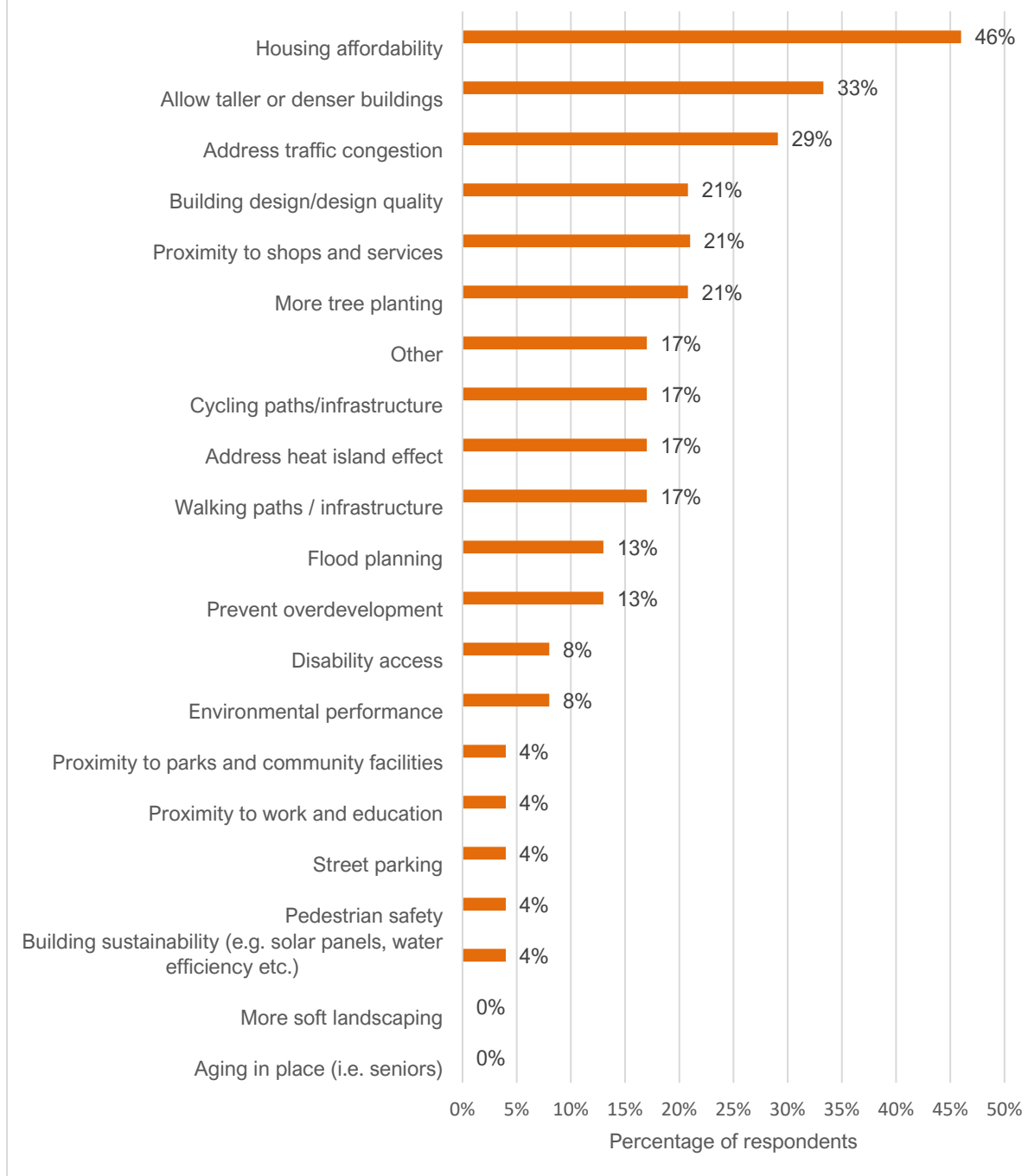
The online survey asked respondents to select three areas for improvement from a set list of available responses. This same question was posed in the hard-copy feedback forms at the Drop-in Sessions (results given separately above).

- The need to address 'housing affordability' came through strongly in the survey results (46%).
- The desire for Council to 'allow taller or denser buildings' was ranked second at 33%.
- The need to 'address traffic congestion' came in a close third with 29%.

Where respondents selected the 'other' option, the feedback form asked the respondent to write their own responses. The areas for improvement given as responses under the 'other' category included:

- *"Not concentrating housing developments in one area"*
- *"Release rural land for development to ease pressures on housing"*
- *"There would be no problem with street parking if each house, flat, villa, town houses and boarding houses were required to have enough parking spaces for the residents"*

## What are the top three areas for improvement that Council could make to residential areas?

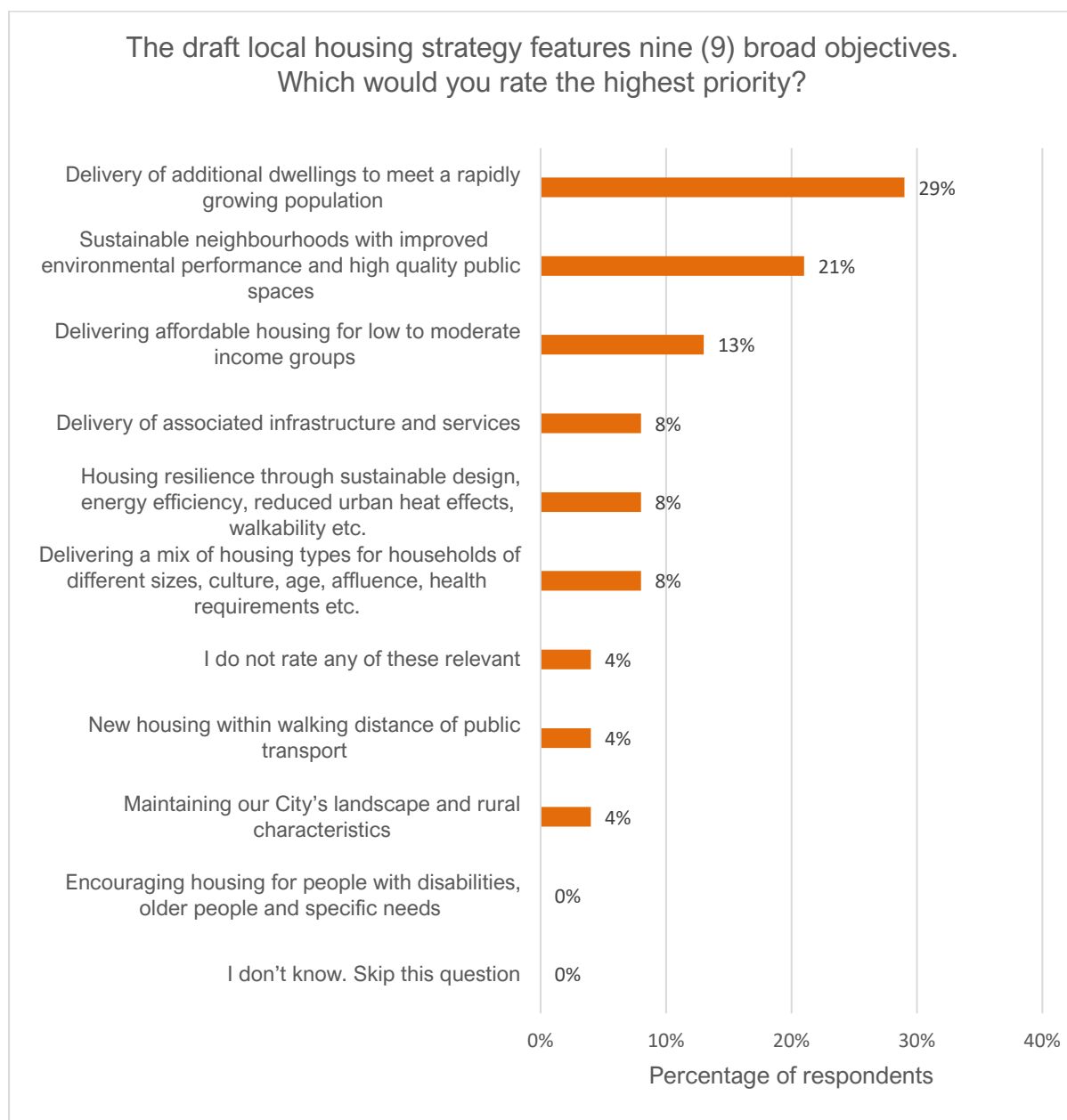


## The draft local housing strategy features nine broad objectives. Which would you rate the highest priority?

The online survey asked respondents to select which objective from the draft Local Housing Strategy they rated as the highest priority.

The 'delivery of additional dwellings to meet a rapidly growing population' came through strongly as a priority for over a quarter of respondents. Only one respondent answered 'I do

not rate any of these relevant'. The distribution of responses across the nine objectives suggest that these objectives are broadly representative of our community's aspirations.



### 3.4 Combined results for “top areas for improvement”

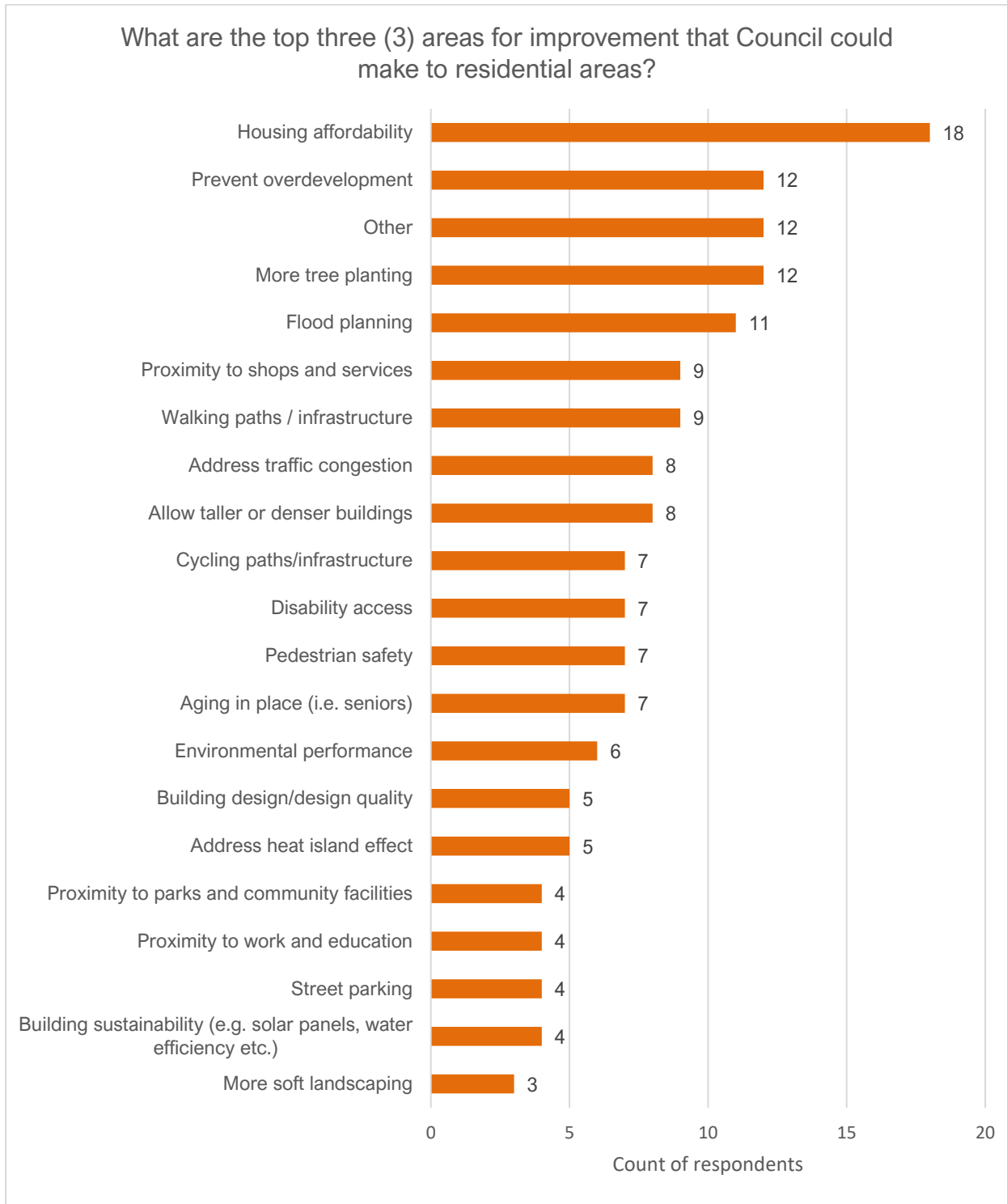
Both the online surveys and hardcopy feedback forms asked respondents to select their “top three” areas for improvement that Council could implement for residential areas.

The need to address ‘housing affordability’ came through strongly across the feedback results.

In combining the results, the most frequent responses were:

- Housing affordability (37% or 18 respondents)
- Prevent overdevelopment (24% or 12 respondents)

- More tree planting (24% or 12 respondents)
- Flood planning (22% or 11 respondents)
- Proximity to shops and services (18% or 9 respondents)



### 3.5 Open-ended questions/freeform comments

Both the online surveys and hardcopy feedback forms provided respondents with an opportunity to provide additional comments, either elaborating on their previous responses or providing feedback in their own words. Facebook comments are also included here.

These open-ended, freeform comments followed several broad themes.

#### **High-quality buildings, design and development done well**

Several respondents' comments picked up on the need for high-quality buildings, as well as the ability of good design and planning to resolve adverse impacts associated with poor development. Some comments mentioned embracing taller and denser buildings, and identified specific benefits of good planning, such as proximity to public transport, availability of footpaths, local amenities, a multicultural mix and a growing economy. Environmental concerns and energy efficiency featured in the comments too, particularly "greener and cleaner technology".

#### **Better access to jobs and travel to work**

Several respondents' comments expressed the desire to strengthen the accessibility for local people to jobs, while reducing the number of residents who need to travel outside of the LGA for work. These comments tended to argue that local jobs need to be the driver for housing growth. Comments also highlighted the importance of investment in transport infrastructure.

#### **The potential of Penrith's City Centre**

Some respondents' comments identified a desire to revitalise the Penrith City Centre. These comments tended to associate the City Centre with an opportunity for higher-rise development. Comments described the City Centre as "run down", but identified the potential to "transform" Penrith into a "world class city".

#### **Encourage active transport infrastructure**

A small number of respondents' comments identified the need to improve the quality of footpaths and expand bicycle infrastructure in Penrith LGA, as well as expressed the desire to widen footpaths for walking and keep the streets and public spaces easily accessible to people to be able to move safely and comfortably without traffic congestion.

#### **Addressing urban heat island effect**

Some respondents' comments emphasised their desire to protect and enhance tree coverage for natural cooling of the LGA. These comments included greater investment in maintaining existing tree canopy, sustainable urban design and quality green spaces.

#### **Congestion, street parking and road network issues**

Several respondents' comments reported the need to mitigate traffic congestion and improve the function of road infrastructure. Comments highlighted the need to reduce on-street parking that was perceived to be related to growth in the medium to high density development in Penrith LGA. Comments related to movement within neighbourhoods (e.g. narrow streets and active transport alternatives), as well as longer trips (e.g. Motorway and major road connections).

## **Rural land issues**

Some respondents' comments identified issues related to the future of our LGA's Rural Lands. While some expressed a desire to develop rural properties for residential development, others objected to redevelopment of existing rural areas. This mix of sentiments is representative of the feedback received in respect to the draft Rural Lands Strategy (exhibited concurrently with the draft Local Housing Strategy). These issues are discussed more comprehensively in the Community Engagement Report for the draft Rural Lands Strategy.

It is worth noting however, that the draft Local Housing Strategy demonstrates that housing demand up to 2036 can be accommodated in existing urban areas and within urban investigation areas, thereby providing limited justification for the release of further rural lands. The NSW Government's 2022 Population Projections has also revised down Penrith City's estimated population, which points to a likely lower demand for housing.

## **Diverse housing choice**

Some respondents' comments related to the diversity of housing types in Penrith LGA, and the importance of meeting the housing needs of the existing and growing community. One respondent cited a "housing crisis" and the issue of affordable options for housing came through in much of the engagement activities.

## **Opportunity to strengthen Penrith City as a destination**

A small number of respondents' comments identified the potential to strengthen creative and night time economies in Penrith LGA offering shopping, dining and entertainment options that includes vibrant live events, venues and cultural expression using public spaces.

## **Prevent overdevelopment**

Several respondents' comments emphasised their desire to avoid overdevelopment in Penrith LGA and preserve unique local character and natural environments. These comments tended to object to medium density and high-rise developments. These comments related to existing urban areas, specifically Emu Plains, Emu Heights, Leonay and North St Marys.

## **Support for development**

Two respondents' comments expressed a desire for investigating the potential for change in existing zoning, encouraging intensification of housing development and release of greenfield areas.

## **Concerns around social and affordable housing**

Some comments referred to the Strategy's objective to ensure access to affordable housing, suitable for all ages and abilities. Some respondents' remarks were disparaging towards social housing and its occupants. This does however point to the need for future forms of social and affordable housing to be better integrated into the urban fabric and less distinguishable from other forms of housing in a locality. Quality buildings and settings are a key to successful social and affordable housing forms.

## **Remaining comments**

Some of the respondents' comments fell outside a particular theme. These comments typically related indirectly to housing delivery, like flooding, waste collection and indoor

recreation. It should be noted that the draft Local Housing Strategy contains a broad discussion of flooding issues in our LGA and how these may have implications for housing delivery.

These remaining comments are not deemed to warrant changes to the draft Local Housing Strategy. Issues of flood planning, open space planning, and waste collection come under separate Council programs and strategies.

### 3.6 Housing-related feedback from the draft Rural Lands Strategy

A number of respondents' comments on the draft Rural Lands Strategy identified issues related to housing in the Penrith LGA. These comments expressed the need to deliver increased supply of affordable housing, suitable for all ages and abilities. One respondent picked up on the need to consider the provision of seniors housing given the changing demographics within the LGA, as well as the need for appropriate local infrastructure to enable residents to age in place. Another respondent's comments referred to existing development controls within the Local Environmental Plan (LEP) and Development Control Plan (DCP) in relation to minimum lot sizes applicable to the E4 zone. The respondent expressed the desire to support subdivision of lots to develop rural properties for residential purposes.

## 4. Key issues raised and responses

Across various feedback channels, Council sought feedback from our community members and key housing stakeholders on the directions of the draft Local Housing Strategy. The key issues arising from all the feedback is as follows:

### Housing affordability

A clear concern was expressed in submissions, online surveys and feedback forms for the need to deliver affordable housing. 37% of respondents to the online surveys and hardcopy feedback forms gave 'housing affordability' as one of their top three areas for improvement that Council could implement for residential areas.

These results indicate a possible escalation in the importance of 'affordable housing' to our community. Council's 2019 Community Satisfaction Research Report asked residents for the top challenge facing Penrith City in the next 10 years and only 4% of respondents chose 'housing availability/affordability'. It should be noted that the Community Satisfaction Research was not specific to housing. Notwithstanding, in 2019, residents believed the top challenges facing Penrith City were 'traffic congestion' (22%), 'managing population growth' (19%) and ensuring 'adequate infrastructure to cater for the growing population' (12%).

A very small number of respondents' remarks were disparaging towards social housing and its occupants. This points to the need for future forms of social and affordable housing to be better integrated into the urban fabric and less distinguishable from other forms of housing in a locality. Quality buildings and settings are a key to successful social and affordable housing forms.

One submission from a private individual equated a perceived oversupply of boarding houses within the Kingwood area with difficulties for families and people on the waiting list for affordable housing.

Some submissions expressed their potential to contribute to, or partner with Council in, the delivery of affordable housing or provide opportunity sites for such housing.

**Response:**

The draft Local Housing Strategy contains a chapter on housing affordability. It recognises the challenge for Council in addressing this issue and particularly the need for cross-government cooperation. Council is working on a draft Affordable Housing Strategy and, separately, a working group has been set up by the Western Sydney Planning Partnership to help inform the revision of the District Plan. It is not considered necessary to amend the draft Local Housing Strategy at this stage. However, it is reassuring that the community's feedback is reflective of work being undertaken by Council in this space.

**High-quality buildings, good design and development done well**

A number of respondents cited the need for high-quality buildings, and the ability of good design and planning to resolve adverse impacts associated with poor development. In the community feedback, medium density and high density housing developments were often equated with poorer outcomes, such as the loss of local character, a lack of street parking, road congestion and contributing to urban heat.

Similarly, several submissions argued that the community prefers detached housing forms. This argument was particularly popular among those submitters advocating for the rezoning of rural lands for residential development or the nomination of specific urban investigation areas. Conversely, some submissions cited the aging housing stock, or vacant properties in established neighbourhoods that negatively affect local amenity. One submission argued that Council should increase the development potential of and to incentivise redevelopment where a precinct has been slow to transition to a higher density.

24% of respondents to the online surveys and hardcopy feedback forms gave 'preventing overdevelopment' as one of their top three areas for improvement that Council could implement for residential areas. While the concept of 'overdevelopment' can be open to interpretation, this report assumes that 'development done well' is its antidote and an obvious goal for Council to pursue.

**Response:**

The draft Local Housing Strategy seeks to improve the quality of housing, including its appearance, longevity, environmental performance and its resilience to a changing climate. Council is regularly revising its DCP to ensure that its development controls reflect best practice and are achieving quality outcomes. The draft Local Housing Strategy contains a chapter on housing character, design and resilience. It is nevertheless an ongoing challenge for Council and something that cannot be easily addressed by a high-level strategy like the Local Housing Strategy.

There are also competing interests when it comes to building design. For instance, while older housing stock can appear 'tired', the draft Strategy found that older housing stock provides a valuable contribution to more affordable housing. Higher quality tends to come with higher building costs. But as the submission from FFMV argues, better design can pay off over the medium and long term through lower running costs and improved quality of life.

Three of the nine housing objectives in the Strategy relate to design, sustainability, resilience, and transit-oriented development. It is considered that this could be strengthened still. Therefore, it is proposed that the Strategy's housing objective 4 be revised to reference 'the delivery of a diversity of *high-quality* housing types...'. Two Potential Mechanisms



related to Kingswood and Werrington are also proposed to be revised to focus the suggested DCP review on design quality and improving a building's environmental performance.

### **Sustainability, resilience and environmental concerns**

In an extension of the previous theme, several respondents' comments advocated for the need to upgrade public open spaces and provide for more street trees planted along streets and within neighbourhoods to mitigate urban heat.

At least two NSW Government agencies provided recommendations to strengthen the draft Local Housing Strategy on issues related to air quality challenges, noise pollution and flooding. The FFMV advocated for the protection of rural areas from urban expansion, citing the reasons of character and rural values.

#### **Response:**

The draft Local Housing Strategy already contains housing objectives relating to character, sustainability, resilience and environmental performance. The draft Local Housing Strategy also contains a chapter on housing character, design and resilience. As such, it considered that the Strategy is largely sufficient. However, additional wording will be included to respond to the EPA's submission with regard to minimising noise impacts on communities. Also as mentioned above, two Potential Mechanisms related to Kingswood and Werrington are proposed to be revised to focus the suggested DCP review on design quality and improving a building's environmental performance.

### **Submitters nominating specific sites/precincts for future housing**

As set out in Section 3.1 and Appendix A of this Community Engagement Report, several submissions come from landholders (or on behalf of landholders) who believe that their properties are appropriate for future housing. Some of these submitters request that their precincts be rezoned, be allowed smaller lot sizes, designated as an investigation area, or otherwise investigated by Council for housing. These comments relate to precincts including Werrington, Llandilo, Berkshire Park, Wallacia and Mulgoa.

This issue dovetails with many of the submissions that came in on the draft Rural Lands Strategy. Several respondents' comments expressed a desire to develop rural properties for residential development. Interestingly, some submissions directly contradicted this view by objecting to the redevelopment of existing rural areas.

#### **Response:**

The draft Local Housing Strategy demonstrates that housing demand up to 2036 can be accommodated in existing urban areas and within identified urban investigation areas. As such, it is difficult to justify the expansion of residential development, especially into rural lands. It should also be noted that the Western City District Plan identifies a Metropolitan Rural Area (MRA) in which rural land must be protected from urban expansion. This principle is picked up in Council's LSPS, with Planning Priority 17 recognising the need to define and protect the values and opportunities of the MRA. The draft Local Housing Strategy and draft Rural Lands Strategy have been prepared and exhibited concurrently as they have a complementary relationship aimed at focussing residential development in urban areas, to protect and enhance the role of rural areas.

The NSW Government's 2022 Population Projections has revised down Penrith City's estimated future population, which points to a likely lower demand for housing. This further undermines any justification that Council may have to release further land for urban development.

As such, amending the Local Housing Strategy to reference specific rezonings or nominate precincts would be inappropriate. Future iterations of the Strategy may consider further land releases if needed.

### **Meeting community need and the sufficiency of our engagement**

A number of submitters questioned whether the draft Local Housing Strategy would indeed be meeting our community's needs and aspirations. These comments tended to focus around the growth of medium density and high density housing, and put an argument that residents actually wanted more space and larger homes.

Comments also tended to relate to Council's broader work, rather than solely the draft Local Housing Strategy. For instance, one submitter mentioned that recent development approvals were not meeting the needs of the community, while Council's policies of the past have not delivered housing affordability for families. Another submitter believes that residents are not consulted on what is needed and wanted for the community. Meanwhile, the Berkshire Park & Llandilo Community Group claimed that its residents are being discriminated against by not being permitted to develop. Interestingly, feedback questioning the sufficiency of Council's engagement activities was far more prevalent in the feedback for the draft Rural Lands Strategy, despite both strategies following identical consultation methods.

#### **Response:**

While Council will endeavour to meet our community's needs and aspirations, this issue points to the need to monitor the success of our strategies and obtain evidence – such as in the form of community satisfaction surveys and ongoing engagement. Council already undertakes these activities across a variety of its projects, most recently in consulting the community for an updated Community Strategic Plan. In terms of the draft Local Housing Strategy, the six week public exhibition period, the six Community Drop-in Sessions held, and the variety of other communication channels undertaken, were considered a reasonable attempt at determining our community's needs and aspirations. Notwithstanding, implementation and evaluation of the Local Housing Strategy should continue to engage with our community.

In responding to feedback, it is proposed to include a new Potential Mechanism related to Werrington that encourages engagement with the community to develop a vision and desired future character for Werrington specifically. It is also proposed to delete two Potential Mechanisms which refer to the possibility of prohibiting low density and medium density housing forms in the R4 high density zone. This latter change responds to submitters who argued that low density housing forms were preferred by the community, and supports the developer having a choice of housing product.

### **Collaboration and working closely with Council**

As set out in Section 3.1 and Appendix A of this Community Engagement Report, several submissions expressed an interest in working closely with Council. This ranged from obtaining regular housing data from Council, resolving cross-agency issues such as flooding, 'having a seat at the table' for the discussion of important issues as a stakeholder, or 'having the ear of Council' when it comes to future urban releases or rezonings.

Two respondents from industry organisation and community group recommended additional listings of 'Partner Stakeholders' in the Section 9.1 Implementation and Delivery Plan. The Deerubbin Local Aboriginal Land Council requested that it be listed, while UDIA recommended that Landcom be listed.

**Response:**

It is proposed to amend the Local Housing Strategy to reference the Deerubbin LALC and Landcom as 'Partner Stakeholders' in the Section 9.1 Implementation and Delivery Plan. Apart from that, Council will endeavour to work with all its stakeholders in implementing this Strategy across our City.

## **Revitalising Penrith's City and Centres**

Several of the survey and feedback form respondents identified the potential of our City and Centres to strengthen Penrith as a destination. These comments included references to opportunities for dining, vibrancy of the City Centre and an improved night-time economy.

**Response:**

Much of the feedback and suggestions for revitalising Penrith's City and Centres fall outside the role of the Local Housing Strategy. Notwithstanding, most of these matters will be considered in the Council's upcoming Corridors and Centres Strategy or associated Structure Plans.

## **Access to jobs and travel time**

Several respondents' comments expressed the desire to strengthen the accessibility for local people to jobs, while reducing the number of residents who need to travel outside of the LGA for work. One respondent asserted that local jobs should be the driver of increased housing and that jobs should be the precursor to more housing. Another respondent referenced the need to make Penrith City Centre more attractive to big businesses such that more businesses would locate there and generate job opportunities.

**Response:**

The draft Local Housing Strategy already has as one of its housing objectives to: *Focus new housing in transit-oriented neighbourhoods within walkable catchments of existing and planned rail stations in order to maximise access to jobs and services and minimise environmental impacts of housing development.*

These employment matters are bigger than the Local Housing Strategy. Access to jobs was a central issue in Council's Employment Lands Strategy (adopted 2021). However, these matters may be considered more comprehensively in the Council's upcoming Corridors and Centres Strategy or associated Structure Plans.

## **Active transport, car travel and road networks**

Many of the submissions and respondent's comments were focussed around aspects of cycling and walking, car travel and public transport. Section 3.5 of this Community Engagement Report details the respondent's comments more comprehensively. Several respondents' comments reported the need to mitigate traffic congestion and improve the function of road infrastructure, as well as highlighted the need to address on-street parking issues associated with medium to high density developments. Meanwhile, other respondents identified the need to improve the quality of footpaths and expand bicycle infrastructure.

A number of submissions argued that their locality's proximity to transport – particularly major roads and Rapid Bus – were a justification for the rezoning of rural lands or specific sites for future housing.

**Response:**

The draft Local Housing Strategy already aims for transit-oriented neighbourhoods and walkable catchments. The Strategy also has as one of its housing objectives to: *Align housing delivery with the delivery of infrastructure.*

Transport matters are bigger than the Local Housing Strategy. These matters may be considered more comprehensively in the Council's upcoming Corridors and Centres Strategy or associated Structure Plans. Council is also updating its Penrith Accessible Trails Hierarchy Strategy (PATHS) to deliver an integrated shared pathway network across our City, as well as delivering new footpaths to respond to private car dependence.

In responding to concerns about the demand for on-street parking in higher density locations, it is proposed to delete a reference on Page 108 that gives examples of possible development incentives, one being reduced car parking rates.

## 5. Proposed changes to the Strategy

As a result of the feedback received, a number of changes are proposed to the draft Local Housing Strategy as follows:

- Strengthening the concept of high-quality housing within the housing objectives, specifically the Strategy's Housing Objective 4 being revised to reference 'the delivery of a diversity of *high-quality* housing types...'
- Revising the wording of two Potential Mechanisms related to Kingswood and Werrington to emphasise that the DCP review should focus on design quality and improving a building's environmental performance.
- Deleting two Potential Mechanisms on Page 93 which refer to the possibility of prohibiting low density and medium density housing forms in the R4 high density zone. This in-part responds to submitters who argued that low density housing forms were preferred by the community, and thereby supports that the choice of product be left-open to developers.
- Deleting a reference on Page 108 that gives the example of a development incentive of reduced car parking rates. This responds to the frequent feedback citing a lack of on-street parking in medium-high density areas. Deleting the specific examples does not take away from the Strategy's intent as there was no specific action related to car parking rates.
- Including a new Potential Mechanism related to Werrington on Page 93 that encourages engagement with the community to develop a vision, desired future character and determining community aspirations for the precinct.
- Revising the wording of one of the Potential Mechanisms on Page 102 to avoid ambiguity and clarify its intent. The mechanism would read: "Support opportunities to deliver housing in rural villages for sub-markets such as seniors living, where this can be shown to maintain the value and amenity of the rural lands and provide the required infrastructure".
- Additional wording to be included to respond to the EPA's submission with regard to minimising noise impacts on communities.

- The Deerubbin Local Aboriginal Land Council (LALC) and Landcom to be listed as 'Partner Stakeholders' in the Section 9.1 Implementation and Delivery Plan. It should be noted that the DPE is working with the Deerubbin LALC to prepare the relevant statutory and public consultation documents relating to the Penrith Structure Plan for the LALC's landholdings.

## 6. Next steps

The issues raised in feedback received during the public exhibition period of the draft Local Housing Strategy will be incorporated into an amended Strategy document where appropriate. This finalised Strategy will be reported to Council seeking endorsement.

## 7. Appendix

### Appendix A

#### Responses to issues raised in formal submissions to the draft Local Housing Strategy

Submitter / Issue Raised	Response
<b>NSW Government Agencies/Corporations</b>	
<b>Environmental Protection Authority (EPA)</b>	
<p>The EPA recommends that the Strategy expressly consider the need to protect current and future residents located in proximity to infrastructure from adverse noise impacts, especially noise impacts associated with the M12 Motorway and Sydney Metro line.</p>	<p>Amend draft Local Housing Strategy.</p> <p>The Strategy will be amended to reference implementing noise control measures at the strategic planning stage to minimise noise impacts on communities. The EPA notes that this is best achieved by applying a hierarchical approach to noise control, adopting the following measures in preferential order:</p> <ul style="list-style-type: none"> <li>a) spatial separation of incompatible land use through appropriate zoning and placement of activities to minimise noise-related land use conflicts,</li> <li>b) minimising noise emissions at source through best practice selection, design, siting, construction and operation as appropriate,</li> <li>c) reducing noise impacts at receivers through best practice design, siting and construction.</li> </ul> <p>However, it should be noted that C12 of Council's DCP already implements controls for the mitigation of noise and vibration, particularly for road, rail and aircraft.</p>
<p>The EPA recommends that the draft Strategy's section on environmentally sustainable development would be strengthened by expressly acknowledging the air quality challenges facing our region. For instance, the EPA argues for appropriate mitigation measures to counter the effects of vehicle emissions on sensitive receivers living in high density residential</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Air quality challenges are not unique to Penrith City, nor solely an issue for residential land. It is considered that this challenge is already embodied in Council's LSPS. The LSPS sets out Council's commitment to working with our community and the NSW Government on initiatives to</p>

<p>development proposed to be built in proximity to the M12 Motorway.</p>	<p>improve air quality. The LSPS notes that these initiatives require a regional approach and NSW Government leadership.</p>
<p>The EPA recommends that the draft Strategy be amended to implement principles from the Waste and Sustainable Materials Strategy 2041 and NSW Circular Economy Policy Statement: Too Good To Waste.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>It is considered that the principles within these NSW Government documents are too specific and detailed to be relevant to the high-level nature of the Local Housing Strategy. Instead, Council's Waste and Resource Strategy, and Resilient Penrith Action Plan contain actions around resource recovery, waste minimisation and a circular economy.</p>
<p>The EPA recommends that the Local Housing Strategy expressly include the avoidance or minimisation of land use conflict as a priority, particularly as it relates to agricultural, rural and industrial land uses.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The draft Strategy already acknowledges the need to transition housing forms where these interface rural lands, sensitive uses or heritage items. This principle is also embodied in Council's LSPS and LEP. However, the online surveys and feedback forms did not identify this principle as a community priority, so it is not considered prudent to amend the housing objectives or priorities.</p> <p>The identification of a 'Rural Edge' in the draft Rural Lands Strategy (exhibited with the draft Local Housing Strategy) largely relates to the minimisation of urban/rural land use conflicts.</p>
<p><b>Department of Regional NSW - Mining, Exploration &amp; Geoscience (MEG) - Geological Survey of NSW</b></p>	
<p>MEG-GSNSW note several Exploration Licences for Group 5 Minerals (including clay/shale and structural clay) overlap the Luddenham and Glenmore Park Urban Investigation Areas (UIAs). The submitter recommends that Council continue to consult with the holders of these Exploration Licences as exploration continues and defines these resource areas.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The Luddenham UIA is the responsibility of the NSW Government. Meanwhile, the Planning Proposal for Glenmore Park Stage 3 is under assessment. Consultation with relevant stakeholders would be borne out as part of the Planning Proposal process.</p> <p>Priority 4.5 of Council's draft Rural Lands Strategy acknowledges the importance for</p>

	planning around identified mineral resources.
<b>Sydney Water</b>	
Sydney Water raise no objection in relation to Council's Local Housing Strategy and support Council's strategy to facilitate additional housing growth within the LGA.	Noted. No change to draft Local Housing Strategy.
In order to provide accurate and timely services, Sydney Water requests detailed housing forecasts including year by year breakdowns of additional dwellings within the Penrith LGA to greater inform their delivery of water related services to the area. It also requests dwellings be further distributed into yearly forecasts by growth suburb. For greenfield areas in particular, such as Orchard Hills, Sydney Water needs to investigate the best servicing options for these areas.	Noted. No change to draft Local Housing Strategy.  The draft Local Housing Strategy forecasts growth in 5-year increments as required by the District Plan. Forecasts are based on precincts, not suburbs, based on the REMPLAN Forecast product. This precinct-approach has been taken throughout the Places of Penrith suite of strategies.
In established growth areas, Sydney Water notes that existing assets and infrastructure which may require amplification, duplication or pressure upgrades. Sydney Water requests to receive frequent projections of both ultimate and annual growth projections and tracking, to ascertain when asset amelioration may be required.	Noted. No change to draft Local Housing Strategy.  The provision of projections to Sydney Water is not part of the draft Local Housing Strategy. Rather, Council provides annual input to the NSW Government's Sydney Housing Supply Forecast which contains more detailed data on housing supply and delivery.
Sydney Water advises that its Growth Servicing Plan (2020-2025) includes the North Luddenham area and Sydney Science Park, but that these are in the options and concept planning stages. As such, delivery timescales, asset location and size are still indicative and subject to change. Projects that fall within the Greater Penrith to Eastern Creek (GPEC) are not all as yet officially in the Growth Servicing Plan as Sydney Water await the provision of finalised boundaries and robust forecast data for both anticipated ultimate and annual demand.	Noted. No change to draft Local Housing Strategy.  Future iterations of the Local Housing Strategy are likely to incorporate more robust housing figures for GPEC, especially Orchard Hills, as more information becomes known.



<p>Sydney Water is developing Integrated Water Management (IWM) plans and supports wider government initiatives promoting integrated water management across LGAs. Early collaboration with Sydney Water may enable the introduction of alternative sustainable solutions (including recycled water) or indicate where these are necessary to enable growth within the timescales indicated.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council too advocates for early collaboration with NSW Government agencies. This is the basis for Council's participation in working groups such as GPEC, the Western Sydney Planning Partnership, and St Marys Collaboration Group.</p>
<p>Sydney Water advocates the use of the NSW Planning Portal for Council referrals.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>For Sydney Water to be identified as a referral authority in the development assessment process via the NSW Planning Portal, legislation amendments are required by the NSW Government to include Sydney Water as a concurrence authority or referral authority via the EP&amp;A Regulations (Clause 4.46) or an applicable State Environmental Planning Policy. This is because the Portal requires the identification of a specific clause requirement that initiates the portal referral. In the absence of the legislative requirement, it cannot be secured that a referral to Sydney Water will be sent as part of the Development Assessment process. Currently the Portal has incorrect references to Sydney Water which are not reflective of legislation and this matter should be raised by Sydney Water directly with the DPE.</p>
<p>Sydney Water requests that Council continue to regularly inform Sydney Water of any changes to projected population, dwelling and employment data. In particular, Sydney Water would like to work more closely with Council to discuss short- and long-term plans, and planning proposals which may impact their ability to service the area in a timely and efficient manner.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council will endeavour to inform Sydney Water of significant changes in population, dwelling and employment data. However, it should be noted that there are already established avenues in which Council is required to provide data to the NSW Government (particularly the DPE) and this data is made publicly available. For instance, the Sydney Housing Supply Forecast, and the publication by Council of its Local Housing Strategy and Employment Lands Strategy.</p>

<b>Transport for NSW (TfNSW)</b>	
TfNSW acknowledge that the draft Local Housing Strategy has been revised/updated to reflect the issues/concerns raised previously by TfNSW in March 2021.	Noted. No change to draft Local Housing Strategy.
TfNSW acknowledge that issues of flooding, evacuation and infrastructure provision (including funding) are critical to housing delivery in Penrith City and could potentially impact several areas targeted for growth in terms of their ultimate land use mix, yields and timeframes. TfNSW advise that further work is being undertaken by the NSW Government in this regard.	Noted. No change to draft Local Housing Strategy.
Whilst flooding is highlighted as a key constraint in the strategy, noting the risk it poses to life and property, TfNSW states that Council should consider the strategy remaining in draft form until the outcomes of State Government work on flooding is approved. If the Local Housing Strategy is finalised prior to this occurring, TfNSW believe there will be a real issue of investment decisions being made and raising expectations about future growth that may not be realised. TfNSW argue for a clear caveat in the draft document as a minimum to highlight that future housing capacity in certain areas is likely to be constrained and could be less than indicated as a result.	Noted. No change to draft Local Housing Strategy.  The Department of Planning and Environment (DPE) has provided Council with a deadline in which to finalise its Strategy. It is Council's view that the additional information provided in the latest version of the Strategy about flooding serves as the "caveat" that TfNSW is recommending.
TfNSW suggest that Council address any issues from the outcomes and recommendations of the 2022 NSW Flood Inquiry applicable to current and future land use planning and management within flood prone locations within the Penrith LGA.	Noted. No change to draft Local Housing Strategy.  The 2022 NSW Flood Inquiry was commissioned by the NSW Government in March 2022. Meetings with affected communities are being held throughout June 2022, and submissions are being accepted until 24 June 2022. The Inquiry has two reporting deadlines of 30 June 2022 and 30 September 2022. Given these timeframes, the Inquiry outcomes are unlikely to be incorporated within the Local Housing Strategy, but may be considered in future iterations of the Strategy.

<p>TfNSW highly recommends that Council undertake a detailed traffic assessment to identify the impacts of the proposed housing yields for various horizon years as identified in the draft Penrith Local Housing Strategy.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Detailed traffic assessments are undertaken as appropriate, typically as part of the assessment of Planning Proposals and large urban releases.</p>
<b>School Infrastructure NSW (SINSW)</b>	
<p>SINSW forms part of the Department of Education. Their submission outlines how SINSW plans for schools in the Penrith LGA.</p>	<p>Noted. No change to draft Local Housing Strategy.</p>
<p>Planning for schools is improved when SINSW has an understanding of the growth proposed by councils in their housing strategies and through Planning Proposals. SINSW welcomes ongoing discussions as Council progresses strategic planning projects for growth areas within the LGA.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council will endeavour to work with SINSW in planning for school infrastructure.</p>
<p>There are 38 primary and 12 secondary schools within the Penrith LGA. SINSW notes that there is long-term primary and secondary school demand (distributed widely) across the school community groups within the Penrith LGA. This is a result of a mix of future Station Precincts, Greenfield Urban Release and Investigation Areas within the wider LGA.</p>	<p>Noted. No change to draft Local Housing Strategy.</p>
<p>SINSW is in the process of reviewing the growth proposed for the LGA in order to identify appropriate solutions to accommodate future projected enrolment demand and is actively engaging with both Council and the NSW Department of Planning and Environment (DPE) on growth areas including the Greater Penrith to Eastern Creek (GPEC) precincts. This will ensure that existing schools are fully utilised before new schools are considered.</p>	<p>Noted. No change to draft Local Housing Strategy.</p>
<p>The need for new school sites will be subject to population and housing forecasts issued recently by DPE, which are being reviewed by SINSW currently. It is likely that future housing growth within the Penrith</p>	<p>Noted. No change to draft Local Housing Strategy.</p>

<p>LGA will affect the future student population across the primary and secondary government schools in the community. A combination of asset and non-asset solutions across the school groups may be required to accommodate future demand to 2036.</p>	
<p><b>Community Groups and Land Councils</b></p>	
<p><b>Friends of Fernhill and Mulgoa Valley (FFMV)</b></p>	
<p>FFMV support the draft Strategy’s principle that new housing be of high quality and resilient to a changing climate. FFMV argue that better design pays off over the medium and long term through lower running costs and better quality of life.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The respondents to the online surveys and feedback forms also highlighted the need for high-quality buildings, and the ability of good design and planning to resolve adverse impacts associated with poor development.</p>
<p>FFMV argue for further strengthening of the Strategy’s approach to high-quality housing through:</p> <ul style="list-style-type: none"> <li>• site-based planning (appropriate siting, bulk and scale)</li> <li>• limiting light pollution</li> <li>• higher levels of fire safety in bushfire prone areas</li> <li>• a DCP user guide</li> </ul>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council employs a merits-based assessment of submitted Development Applications (DAs), and assess proposals against relevant development controls in Council’s DCP that include such matters as siting, bulk and scale.</p> <p>The low density housing typical of rural areas is unlikely to generate significant light pollution issues. Notwithstanding, D1 of Council’s DCP contains a control to minimise interference by light and noise associated with truck parking. Other sources of significant light are likely to fall under the merits-based assessment of DAs.</p> <p>Development controls for bushfire prone areas are set by the NSW Rural Fires Service, in a document titled ‘Planning for Bush Fire Protection’ (PBP). All development on bushfire prone land must meet the requirements of PBP, unless the consent authority has consulted with the NSW Rural Fire Service.</p>

	<p>Appendix F2 of Council’s DCP already contains a user-friendly explanation of the Development Process. In 2018, the Department of Planning and Environment released a guide to small housing development, titled ‘Your guide to the Development Application process’. This document is made available on the Planning Portal, being the system through which all DAs now need to be submitted.</p>
<p>FFMV support the protection of rural areas from urban expansion. FFMV support the application of Local Character Statements for Mulgoa and Wallacia villages. It also discourages activities/development that alter the existing scenic, landscape or environmental qualities of Penrith City’s rural backdrops.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>These are principles embodied in both the draft Local Housing Strategy and draft Rural lands Strategy.</p>
<p>FFMV queries a statement in the draft Strategy in relation to “rural-residential dwellings” being supported where these “are consistent with existing and future economic activities and amenity of the rural area” and its applicability to the Mulgoa Valley.</p>	<p>Amend the draft Local Housing Strategy.</p> <p>That specific statement is contained within a series of “Potential Mechanisms” that are identified throughout the draft Strategy. The Potential Mechanisms are not definitive actions, but a series of ideas or concepts that could be investigated further by Council.</p> <p>Notwithstanding, the current wording is ambiguous and could be improved. It is proposed to revise the wording to read: “Support opportunities to deliver housing in rural villages for sub-markets such as seniors living, where this can be shown to maintain the value and amenity of the rural lands and provide the required infrastructure.”</p> <p>It is noted that the existing statement in the draft Strategy already refers to “specific sub-markets such as seniors housing”. FFMV supported statements regarding seniors housing in their submission.</p>
<p>FFMV’s submission notes that the Mulgoa Valley has long attracted high-income earners for the rural lifestyle, scenic landscape and quiet. FFMV argue that, today, having trucks and containers or a small business next door is not an attractive</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The issues and responses regarding truck parking and amenity impacts of rural businesses are discussed in the Community</p>

<p>proposition for such professionals. Nor does Penrith have the cultural activities and fine dining to attract professionals.</p>	<p>Engagement Report for the draft Rural Lands Strategy. One action of that Strategy is to prepare DCP guidelines for truck parking and storage in the rural areas – which is in direct response to community feedback around amenity concerns.</p> <p>Council is endeavouring to improve the cultural, dining and entertainment offerings of our City. More information can be found in Council’s Night Time Economy Strategy and LSPS. This issue is likely to be a consideration in Council’s upcoming Corridors and Centres Strategy.</p>
<p>FFMV question areas of urban release which have one side of a road rural and one side an urban subdivision. In respect to Glenmore Park Stage 3, it argues that there needs to be a buffer zone of parkland on the northern side of Chain of Ponds Road.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>While the Glenmore Park Stage 3 Planning Proposal remains under assessment, it does at present propose a “buffer” of larger parcels on the periphery of the release area which would be zoned E4 Environmental Living.</p>
<p>FFMV question why Council is supporting truck parking and storage operations in rural locations such as the Mulgoa Valley, as opposed to industrial areas or along major transport corridors. The group does not support small or large operators to house their trucks or equipment. Such a land use is to the detriment of the scenic values of the Valley. Truck parking is also occurring in Mulgoa Village. This land use negatively impacts local amenity with early morning revving of truck motors, diesel fumes, and noise.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The issues and responses regarding truck parking and storage are discussed in the Community Engagement Report for the draft Rural Lands Strategy. One action of that Strategy is to prepare DCP guidelines for truck parking and storage in the rural areas. However, neither Strategy proposes to change the existing permissibility of land uses (e.g. small businesses) in rural areas.</p>
<p>The submission notes that the draft Rural Lands Strategy supports visitor accommodation. However, FFMV questions why there is nothing in the draft Local Housing Strategy to indicate how visitor accommodation will be managed in the Mulgoa Valley.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Under the land use terms set out in the NSW Government Standard Instrument, the group term ‘tourist and visitor accommodation’ is distinct and separate from the ‘residential accommodation’ group term (which includes dwelling houses, multi dwelling housing, boarding houses and seniors housing). As such, tourist and visitor accommodation is a business enterprise,</p>

	best handled under the Rural Lands Strategy and/or Economic Development Strategy.
FFMV does not support a blanket “one size fits all” approach to agritourism. It advocates for a site-based approach and principle of no or low environmental impact. FFMV supports the concept of agritourism and of short term farm stay accommodation on properties of less than 10ha with no additional built structures, or within the villages of Mulgoa and Wallacia. FFMV does not support farm gate activities in the Mulgoa Valley or temporary or moveable accommodation such as caravans, tents etc.	Noted. No change to draft Local Housing Strategy.  As noted above, tourist and visitor accommodation is a business enterprise, as is agritourism, best handled under the draft Rural Lands Strategy and/or Economic Development Strategy.
<b>Berkshire Park &amp; Llandilo Community Group</b>	
The Group do not agree with preserving the RU4 zoned small rural lands in Berkshire Park and Llandilo, arguing that these are not suitable for farming and are no longer financially viable. The Group seek to have these areas rezoned for housing.	Noted. No change to draft Local Housing Strategy.  The issues raised here are dealt with more comprehensively in the Community Engagement Report for the draft Rural Lands Strategy.  In respect to the Local Housing Strategy, the document demonstrates that housing demand up to 2036 can be accommodated within existing urban areas and urban investigation areas. As such, it is difficult to justify the expansion of residential development into the rural lands of Berkshire Park and Llandilo. It should also be noted that the Western City District Plan identifies a Metropolitan Rural Area (MRA) in which rural land must be protected from urban expansion. Council is required to implement the MRA.
The Group argue that: <ul style="list-style-type: none"> <li>• New housing estates have trees and gardens when planned and built well.</li> <li>• The Sydney Metropolitan Strategy 2007 designated Penrith as the ‘<i>City Centre</i>’ for Western Sydney. The</li> </ul>	Noted. No change to draft Local Housing Strategy.  The issues raised here are dealt with more comprehensively in the Community Engagement Report for the draft Rural Lands Strategy.  In respect to the Local Housing Strategy, the document demonstrates that housing

<p>Penrith City Vision also supports designation as a 'Global City'.</p> <ul style="list-style-type: none"> <li>• The area is adjacent to the development of Marsden Park. Berkshire Park and Llandilo are the natural next housing estate.</li> <li>• The area is surrounded by new urban subdivisions, e.g. Cranebrook, Jordon Springs etc.</li> <li>• Penrith City is one of the slowest growing LGAs in Western Sydney. The area has potential to supply a 30,000-50,000 homes.</li> <li>• Housing in the area would connect and provide integration with Hawkesbury LGA, Richmond and Windsor.</li> <li>• Much of the area is not used for agricultural purposes. Many properties are small and the soil is unsuitable. The properties are not financially viable for agri-businesses and the agricultural industry is increasingly volatile.</li> <li>• Many RU4 zone rural lots within the area do not comply with Council's current LEP minimum lot size of 2 hectares for RU4 zoning.</li> <li>• A proportion of the area is not flood affected.</li> <li>• Water supply (for farming) is limited.</li> <li>• Council rates are costly and will be soon unaffordable.</li> <li>• The demand for housing is high.</li> <li>• The area is highly accessible to transport and surrounding centres, universities etc.</li> <li>• Properties could be readily serviced by sewerage and water.</li> <li>• Churches, retirement villages, correctional facilities and non-agri businesses are locating to the area.</li> <li>• Roads within the area are under pressure, and resulting in long delays. The proposed M9 Motorway</li> </ul>	<p>demand up to 2036 can be accommodated within existing urban areas and urban investigation areas. As such, it is difficult to justify the expansion of residential development into the rural lands of Berkshire Park and Llandilo. It should also be noted that the Western City District Plan identifies a MRA in which rural land must be protected from urban expansion. Council is required to implement the MRA.</p>
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<p>and Castlereagh Connection will pass through the area.</p> <ul style="list-style-type: none"> <li>Residential development will support investment in local infrastructure, esp. schools, roads, flood evacuation, services.</li> </ul>	
<p>The Group question why their area is being restricted to grow? The Group argues that it is being discriminated against compared to the rest of the Sydney Metropolitan Area and NSW.</p> <p>They also question why do they have so many restrictions, e.g. being unable to farm or build houses? They question what other areas in NSW are being similarly restricted?</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The draft Local Housing Strategy seeks to identify the locations for housing growth that are best-suited (i.e. refer to the nine housing objectives). The draft Strategy also only needs to deliver as much housing as can be supported by the housing demand estimates for the 20-year timeframe of the Strategy. To this end, the draft Strategy demonstrates that Council can indeed meet demand in and around the nominated Key Growth Areas, without the need to rezone areas of Berkshire Park and Llandilo.</p> <p>The NSW Government has mandated the protection of rural lands through the nomination of a MRA in its District Plan. Council's draft Strategy is underpinned by these same principles (as is Council's LSPS).</p> <p>The MRA applies to some areas in surrounding LGAs, not only the Penrith LGA.</p>
<p><b>Design Collaborative Pty Ltd on behalf of the Deerubbin Local Aboriginal Land Council (LALC)</b></p>	
<p>The Deerubbin LALC owns 1,500 hectares of land in the northern area of Penrith City with a further approximately 600 hectares under claim. The submission asserts that Deerubbin LALC's landholdings in northern Penrith are strategically significant to the achievement of local and regional planning, biodiversity and economic outcomes and its own economic, community and cultural outcomes. Deerubbin LALC's Penrith Structure Plan is the subject of an agreement between it and the NSW Government.</p>	<p>Noted. No change to draft Local Housing Strategy.</p>

<p>The Deerubbin LALC supports Council's actions and mechanisms set out in the draft Local Housing Strategy, specifically in relation to maintaining local character; delivering housing for specific submarkets like seniors; allowing low density residential infill; the provision of lifestyle/executive housing on the periphery of masterplanned urban areas; and recognising the role of new and emerging housing forms.</p>	<p>Noted. No change to draft Local Housing Strategy.</p>
<p>The draft Local Housing Strategy identifies the Deerubbin LALC's landholdings within a 'limited change area'. The Deerubbin LALC advises that its Penrith Structure Plan identifies some of its landholdings for residential development.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The Penrith Structure Plan represents a partnership between the NSW Government and Deerubbin LALC. It is understood that DPE is working with Deerubbin LALC and an independent accredited assessor to prepare the relevant statutory and public consultation documents.</p>
<p>The submitter asserts that the Deerubbin LALC land has the potential to provide access to affordable housing opportunities for its community. There is a potential to partner with Council in the delivery of affordable housing or provide opportunity sites for such housing within the capacity of the rural areas.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The Local Housing Strategy does not seek to identify specific sites for affordable housing. Council's upcoming work on an Affordable Housing Strategy may further explore the potential for specific partnerships or sites.</p>
<p>Deerubbin LALC recommends that it be included in the list of "Partner Stakeholders" in the Section 9.1 Implementation and Delivery Plan.</p>	<p>Amend the draft Local Housing Strategy.</p> <p>Add Deerubbin LALC to list of stakeholders.</p>
<p><b>Industry Organisations</b></p>	
<p><b>Urban Development Institute of Australia (UDIA)</b></p>	
<p>UDIA express their general support for the draft Local Housing Strategy. The submitter advocates for liveable, affordable and connected smart cities. UDIA argue for the need for Government and the development industry to work together to improve housing affordability, diversity, and to address the housing supply crisis in Sydney.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The principles advocated for by UDIA are embodied within the objectives, priorities and actions of the draft Local Housing Strategy.</p>

<p>UDIA recommends that Council investigate other potential urban investigation areas in the Penrith LGA to sustain greenfield supply over the long term. UDIA expresses concern that the Local Housing Strategy does not provide for long term greenfield housing beyond 2030. UDIA contend that all available greenfield housing in the LGA will be fully exhausted by 2030 or earlier.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The Strategy provides a framework for the period up to 2036, as required by the District Plan. Notwithstanding, the Strategy is expected to be an iterative document that encompasses planning for further growth areas as more information becomes known and planning progresses.</p>
<p>UDIA recommend that Council investigate The Northern Road Corridor, which is fast becoming a major regional collector road that will service the Aerotropolis, for greenfield housing.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The draft Local Housing Strategy demonstrates that housing demand up to 2036 can be accommodated within existing urban areas and urban investigation areas. As such, it is difficult to justify the expansion of residential development into The Northern Road Corridor at this stage.</p>
<p>UDIA recommends that Council work with the NSW Government on a program to achieve the staged release of key Urban Investigation Areas in the Penrith LGA. The submitter argues that the uncoordinated delivery of State and local infrastructure is resulting in development delays, and impacts on a developer's return on investment.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council will endeavour to work with the NSW Government to deliver housing supply under the Local Housing Strategy. For example, Council is presently collaborating with the Department of Planning and Environment (DPE) on the Greater Penrith to Eastern Creek (GPEC) area.</p>
<p>UDIA recommends that Council work on a local infrastructure delivery program, with State Government, to support housing growth. UDIA raised concerns that some councils are hoarding developer contributions.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The draft Local Housing Strategy already acknowledges the importance of a robust infrastructure contributions framework and a program to deliver improved local infrastructure. Council is committed to timely, cost-effective delivery of local infrastructure.</p> <p>In order to adequately reflect and understand demographic influences within the Penrith LGA including population change, household structure and other social/cultural trends, Council is undertaking a review of its contribution plans.</p>

<p>UDIA recommends that Council collaborate closely with industry on the implementation of the Local Housing Strategy. UDIA argues that collaboration avoids problems with infrastructure coordination, poorly drafted planning provisions, and a lack of developer commitment to planning outcomes.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council will endeavour to work with the development industry to satisfy the nine objectives of its Local Housing Strategy.</p>
<p>UDIA also considers that the Local Housing Strategy would benefit from the inclusion of Landcom as a “Partner Stakeholder” in the Section 9.1 Implementation and Delivery Plan.</p>	<p>Amend draft Local Housing Strategy.</p> <p>Add Deerubbin LALC to list of stakeholders.</p>
<p>UDIA recommends investigation of opportunities for shared open space and community facilities including school sporting ovals and use of rooftop gardens. This would be particularly beneficial for proposed town centres, which are space constrained.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council too has advocated for the shared use of school facilities after-hours, including in its submission to the Legislative Council’s 2021 Enquiry into the Planning and Delivery of School Infrastructure.</p> <p>Further consideration of these concepts may form part of the upcoming Corridors and Centres Strategy work.</p>
<p>UDIA recommends the concentration of additional urban renewal precincts along future proposed rapid bus corridors.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council continues to work with Transport for NSW on the rapid bus network. At present, the location of these rapid bus routes are confidential and not reflected in the draft Strategy. Future iterations of the Strategy (or other components of the Places of Penrith suite of strategies) are likely to factor in the Rapid Bus project.</p>
<p><b>Stockland</b></p>	
<p>In December 2021, Stockland entered a Project Delivery Agreement with Western Sydney University (WSU) to investigate the redevelopment of underutilised sites at WSU Werrington. The submitter asserts that the 99-hectare site offers the opportunity to create an urban neighbourhood and town centre that is integrated with the existing campus facilities and supports the overall</p>	<p>Noted. No change to draft Local Housing Strategy.</p>

<p>objectives of the Penrith Health and Education Precinct (PHEP).</p>	
<p>Stockland generally supports the vision, objectives and many of the actions set out in the draft Local Housing Strategy. However, Stockland suggests that there is a significant opportunity for further analysis to refine plans for the (PHEP).</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>This version of the draft Local Housing Strategy focussed on those development sites and precincts for which there was already planning underway, and a degree of certainty with respect to their future residential potential. Since the PHEP requires more work, especially in light of there being no Metro station at Werrington, it is best that the PHEP be considered in future iterations of the Local Housing Strategy.</p>
<p>Stockland encourages Council to progress the Corridors and Centres Strategy. Stockland anticipates opportunities to provide meaningful input to assist in defining the structure, land use mix, roles, and functions of land within the East-West Corridor.</p> <p>Stockland state that the Corridors Strategy needs to more clearly define how the Nepean Hospital, WSU and TAFE NSW create gravity to attract complementary uses, concentrating clusters of economic activity, research, and innovation to create a critical mass of investment and ideas that leverage these anchors.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council is continuing its work on the draft Corridors and Centres Strategy. The extent to which the PHEP will feature in the Corridors and Centres Strategy will depend on the information and resources available.</p>
<p>Stockland argues that the decision to align the Metro away from WSU Werrington requires Council to reassess if the predominant land zoning of B7 is the best strategic planning outcome. Stockland state that the ability of the PHEP to attract regionally significant employers and businesses is limited without a step change in accessibility.</p> <p>Stockland highlights the need to undertake an evidence-based review of appropriate land uses within the PHEP and specifically WSU Werrington.</p> <p>Stockland argues that there is strong justification for WSU Werrington to</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council's draft Delivery Program 2022-26 and Operational Plan 2022-23 includes the development of structure plans for The Quarter, and Werrington/Kingswood (similar to the work underway for St Marys Town Centre). Should this work progress, it is likely that consideration will be given to the vision and appropriate mix of future land uses in the broader precinct.</p>

<p>transition from the historically planned role of a Business Park to a key infill masterplanned community. Stockland state that the contribution WSU Werrington can make to achieving Council's housing objectives significantly outweigh the Precinct's potential as a strategic location for employment growth.</p>	
<p>Stockland argues that, in the context of changing drivers for employment and economic activity in Western Sydney, the Employment Lands Strategy requires revision, particularly in relation to the capacity for employment generating economic activity in the PHEP.</p> <p>Stockland believe that the Employment Lands Strategy is not sufficiently supported by evidence, nor takes account of the changing nature of the Western Sydney landscape.</p> <p>Stockland's view is that Council's Strategic Plans need to define how, where and what type of jobs can be delivered.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council's Employment Lands Strategy (ELS) was adopted in October 2021. Section 10.3 of the ELS sets out a plan for reviewing the document which includes aligning its review with finalisation of Council's next LSPS and the Greater Cities Commission's next District Plan.</p>
<p>Stockland states that an integrated approach to growth that considers economic and employment activity, and the need to house and support a rapidly growing population is required.</p> <p>Stockland acknowledges Council's upcoming Corridors and Centres Strategy as an effective mechanism to define the role and function of the land within the East-West Corridor. Stockland recommend that the Corridors and Centres Strategy inform revisions to both the Employment Lands Strategy and finalisation of the Local Housing Strategy.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council is continuing its work on the draft Corridors and Centres Strategy. The extent to which the PHEP will feature in the Corridors and Centres Strategy will depend on the information and resources available.</p> <p>The Corridors and Centres Strategy is expected to form part of the same suite of strategies, titled "Places of Penrith", as the Employment Lands Strategy and Local Housing Strategy. As such, the Corridors and Centres Strategy would be likely to inform future revisions of both. However, it should be noted that comprehensive reviews could be a number of years away.</p>
<p>Stockland recommend that the PHEP be supported by a Structure Plan that focuses activity on existing anchors and in locations that are highly accessible.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council has not resolved to undertake a Structure Plan for the PHEP to date. However, Council's draft Delivery Program</p>

	2022-26 and Operational Plan 2022-23 proposes the development of structure plans for The Quarter, and Werrington/Kingswood. These would be matters for Council's consideration separate from the Local Housing Strategy.
<p>Stockland's submission includes a table of the draft Local Housing Strategy's nine objectives, together with a commentary detailing how it believes the development of WSU Werrington could meet those objectives.</p> <p>Stockland argues that WSU Werrington has the potential to deliver significant housing volume and diversity, as well as affordable housing, through a masterplan and coordinated delivery program.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>This version of the draft Local Housing Strategy focussed on those development sites and precincts for which there was already planning underway, and a degree of certainty with respect to their future residential potential.</p> <p>Council has not resolved to undertake a Masterplan for the PHEP to date. This would be a matter for Council's consideration separate from the Local Housing Strategy.</p>
<b>Private Individuals</b>	
<b>Private Individual – Submission 1</b>	
<p>The submitter identifies as a long-time resident. The locality (generally between Penrith and Nepean Hospital) has been targeted for urban renewal, especially townhouses. When R4 zoning was introduced, there was an initial surge in redevelopment. In the past, older residents have sold their properties to developers for low prices. This has led to speculative purchases and landbanking by developers. These sites sit undeveloped and vacant for long periods of time. This situation undermines the neighbourhood's function and amenity.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Speculative land purchases and landbanking by developers come about as a result of Penrith City's relatively low land values (as compared to much of Metropolitan Sydney). Land speculation is out of Council's control. This issue affects many parts of Greater Sydney, not just Penrith City.</p>
<p>Remaining dwelling houses are in poor condition. The stock of townhouses are also aging. The submitter argues that new development should have a long design life. Some properties have been adapted for medical practices – thereby undermining the role of the R4 zone.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The draft Local Housing Strategy seeks to improve the quality of housing, including its appearance, longevity, performance, and its resilience to a changing climate.</p> <p>While older housing stock can appear "tired", the draft Strategy found that older stock provides a valuable contribution to</p>

	<p>more affordable housing. One of the challenges for Council will be trying to maintain affordable housing stock.</p> <p>It is true that number of medical practices have set-up around the Nepean Hospital and are occupying land that could otherwise be used for housing. Health services facilities (incl. medical centres and health consulting rooms) are permitted in the R4 zone by the NSW Government Transport and Infrastructure SEPP. The SEPP overrides Council's LEP and therefore Council cannot change the permissibility of this land use. It is however worth noting that one of the LEP's objectives of the R4 zone is to enable other land uses that provide facilities or services to meet the day to day needs of residents. This is the basis for allowing child care centres and neighbourhood shops in the zone. It could be argued that medical practices provide a similar service to meet the needs of residents.</p>
<p>Council's controls have failed to incentivise development of the precinct. The locality has failed to develop despite being flood-free, accessible, connected to infrastructure, and well-positioned. The submitter argues that height limits are inadequate, and developers therefore choose to develop elsewhere. Development potential should be increased to trigger redevelopment.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The need to 'Prevent Overdevelopment' came through strongly in the survey responses. When Council considers increases to building height and density it must carefully weigh-up the demand for new housing, development viability, the need for supporting infrastructure, and the possible impact of denser developments on the community and their amenity.</p> <p>While there has been no recent testing of the development viability of existing controls around the subject area of Penrith/Kingswood, similar work in the St Marys Town Centre indicated that the existing planning controls there were sufficient and provided an adequate supply of housing in the short-medium term. The analysis concluded that take-up of this existing development potential had been slow in St Marys on account of limited market demand. It was predicted that take-up would increase over time, particularly as local infrastructure projects came to fruition.</p>



	<p>It is reasonable to expect a similar increase in market demand over time in Penrith/Kingswood. It is common for rezoned land in established areas to take time to convert to higher density.</p>
<p>The submitter argues that planning reviews take too long and are out-of-date by the time they are adopted by Council.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Finalisation of the draft Local Housing Strategy has indeed been delayed. This was due to a number of factors including the impact of the COVID-19 pandemic on population figures, and the announcement of station locations for the Sydney Metro.</p> <p>Council is endeavouring to develop “living” strategies such that these documents evolve and change as information becomes available, and are more responsive to community need.</p>
<p><b>Private Individual – Submission 2</b></p>	
<p>The submitter expresses disappointment at the draft Local Housing Strategy. They do not feel that the current housing policy has delivered housing diversity or housing affordability for families.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The Council is endeavouring to address the deficiencies (either real or perceived) of its past policies through the revised draft Strategy. Council acknowledges the massive challenge it has ahead in respect to influencing housing affordability and diversity.</p>
<p>The submitter questions whether the recent approvals for housing, boarding houses, flats, villas and town houses are meeting the needs and requirements of the community. The submitter argues that people need space, especially since COVID. They believe the Strategy is “<i>trying to build little boxes that place everyone in a definite space</i>”.</p> <p>The submitter references the need for evidence that Council is meeting the needs of the community.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The data obtained to inform the draft Local Housing Strategy indicates that while there is still a strong preference for detached dwelling houses, this is changing and more residents are choosing medium and high density options (i.e. 17.8% of our residents lived in medium-high density according to the 2016 Census). To a significant extent, this choice comes down to the greater affordability of smaller homes.</p> <p>The draft Local Housing Strategy does not advocate for solely medium-high density developments, but rather a mix of housing</p>

	<p>types and sizes. In Penrith LGA in 2020-21, there were 514 dwelling approvals for houses and 603 approvals for denser housing forms. It is hoped that a mix will satisfy the community’s varied needs.</p> <p>The community engagement undertaken for this Strategy forms part of the “evidence” that determines whether Council is meeting local aspirations. Like the submitter, the need to address ‘Housing Affordability’ and ‘Prevent Overdevelopment’ came through strongly in the feedback results. More broadly, Council’s Community Satisfaction Research Report in 2019 had 83% of respondents agreeing to the statement “I am happy living in Penrith”, while 90% of residents rated their overall quality of life in Penrith City as ‘good’ to ‘excellent’. Council is committed to ongoing engagement with the community to ensure that its needs are being met.</p>
<p>The submitter asserts that student accommodation should be the responsibility of the educational provider. They express concern that there are many student accommodation rooms that are vacant.</p> <p>The submitter references the need for evidence of whether university enrolment has increased, or more students are studying part-time.</p> <p>The submitter asks questions in respect to whether this accommodation houses only one student; whether rooms are available to non-students; and who enforces these requirements.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The provision of student housing in Penrith City is largely market-driven. While WSU provides some on-campus accommodation, a lot of student accommodation would be provided by the private-market in the form of boarding houses or traditional rental properties.</p> <p>Under NSW planning legislation, student housing is not separately defined. Instead, this land use falls into the definition of a ‘boarding house’ (or since November 2021, a ‘co-living housing’). Accordingly, boarding houses are not restricted to students and are available to the general public. Rooms can have one or multiple boarders.</p> <p>Local councils are responsible for approving new boarding houses, and enforcing safety and accommodation standards in existing boarding houses. Councils also have the power to fine operators if they are unregistered and order them to meet building, safety and accommodation standards.</p>

<p>The submitter questions the need for so many boarding houses in Kingswood. They question why many boarding rooms are vacant. The submitter provides several photos showing ‘for lease’ signs outside boarding houses.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The provision of boarding houses in Penrith City is largely market-driven.</p> <p>The NSW Fair Trading’s Boarding House Register (for premises accommodating five or more paying residents) records 13 boarding houses in the Penrith LGA, of which 9 are located in Kingswood. This figure is comparable to other university precincts like Marsfield/North Ryde with 7 boarding houses registered around Macquarie University; Campbelltown with 8 boarding houses; and Kensington/Randwick with 44 boarding houses around UNSW.</p> <p>Anecdotally, boarding houses have a higher turnover of residents than traditional housing, which may account for the noticeable number of ‘for lease’ signs. Similarly, the COVID-19 pandemic is likely to have reduced the number of students and recent migrants seeking to reside in the area.</p>
<p>The submitter believes that residents and community are not consulted on what is needed and wanted for the residents or the community.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council is always endeavouring to improve its consultation methods. With respect to the draft Local Housing Strategy, community engagement initiatives included online information, surveys, feedback forms, community drop-in sessions, and social media.</p>
<p>The submitter expresses concern that there are families and people on the waiting list for affordable housing. They question “<i>what are these boarding houses doing to reduce the number of families on the waiting list for affordable housings?</i>”.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Families or individuals “on a waiting list” is likely to refer to those people seeking Government-supported or not-for-profit sector social housing. Whereas boarding houses tend to be privately-owned, low-cost housing. In this sense, the existence of boarding houses are not necessarily reducing waiting lists for social housing.</p> <p>Boarding houses tend to have single bedrooms or occasionally two rooms, so</p>

	they are indeed unlikely to be addressing the need of families.
<p>The submitter states: “<i>Development should improve the community, not create problems</i>”.</p> <p>The submitter does not feel that the current housing policy is improving the living standard in Penrith LGA, stating that “<i>construction is approved first and then they try to work out the congestion, traffic, parking, heat</i>”.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council endeavours to ensure that all development is in the interests of our community. One of the nine stated aims of the Penrith LEP includes: ‘<i>to accommodate and support Penrith’s future population growth by providing a diversity of housing types, in areas well located with regard to services, facilities and transport, that meet the current and emerging needs of Penrith’s communities and safeguard residential amenity</i>’. Council’s challenge is to balance a growth in development with enhancing of residential amenity.</p>
<b>Private Individual – Submission 3</b>	
<p>The submitter requests that Berkshire Park and Llandilo be considered for urban housing. The submitter does not want these areas to remain as farmland.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The issues raised here are dealt with more comprehensively in the Community Engagement Report for the draft Rural Lands Strategy.</p> <p>In respect to the draft Local Housing Strategy, the document demonstrates that housing demand up to 2036 can be accommodated within existing urban areas and urban investigation areas. As such, it is difficult to justify the expansion of residential development into the rural lands of Berkshire Park and Llandilo. It should also be noted that the Western City District Plan identifies a MRA across this locality in which rural land must be protected from urban expansion. Council is required to implement the MRA.</p>
<p>The submitter argues that these areas are not suitable for farming and are no longer financially viable. Specifically, the submitter argues that:</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The issues raised here are dealt with more comprehensively in the Community Engagement Report for the draft Rural Lands Strategy.</p>

<ul style="list-style-type: none"> <li>• Many properties are too small for commercial farming and the soil is unsuitable for farming.</li> <li>• Council has restricted what can be done on land.</li> <li>• Agriculture and rural uses are not profitable.</li> <li>• The RU4 zoning does not allow for large scale farming or expansion of existing uses.</li> <li>• Properties could be readily serviced by sewerage and water.</li> <li>• Water supply (for irrigation) is limited and expensive.</li> <li>• The cost of land, rates and irrigation are too high to allow small producers to compete.</li> <li>• The area is surrounded by new urban subdivisions, e.g. Marsden Park, Cranebrook, Jordon Springs etc.</li> <li>• The area is adjacent to the development of Marsden Park and the “<i>next logical area to be developed</i>”.</li> <li>• The demand for housing is high. Surrounding areas are experiencing housing stress.</li> <li>• The location provides easy access to amenities.</li> <li>• Churches, retirement villages, correctional facilities and non-agri businesses are locating to the area.</li> <li>• Urban development would reinforce Penrith CBD as a ‘City Centre’ and replace houses lost to high-rise apartments.</li> <li>• The area is highly accessible to transport, major roads, nearby centres, shops, employment, hospitals, schools, universities, sporting facilities, civic and correctional facilities, urban amenities etc.</li> </ul>	<p>In respect to the draft Local Housing Strategy, the document demonstrates that housing demand up to 2036 can be accommodated within existing urban areas and urban investigation areas. As such, it is difficult to justify the expansion of residential development into the rural lands of Berkshire Park and Llandilo. It should also be noted that the Western City District Plan identifies a MRA across this locality in which rural land must be protected from urban expansion. Council is required to implement the MRA.</p>
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<ul style="list-style-type: none"> <li>The area would make for an easy and low cost urban development site.</li> </ul>	
<p>The submitter seeks a meeting to discuss the way forward for an urban release of Berkshire Park and Llandilo.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The submitter has had an opportunity to make written representations through the public exhibition process. All community members have an opportunity to make further representations at a Council Meeting or contact the Elected Members of Council. Community members are also welcome to contact or meet with relevant Council staff about potential Planning Proposals or planning matters.</p>
<b>Private Individual – Submission 4</b>	
<p>The submitter represents a major landholder in the area of Kings Hill Road, Mulgoa.</p>	<p>Noted. No change to draft Local Housing Strategy.</p>
<p>The submitter objects to the Rural Land Classification, and instead seeks to include the area as part of future investigation areas to provide for the medium to long term housing needs for the community.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The draft Local Housing Strategy demonstrates that housing demand up to 2036 can be accommodated in existing urban areas and within identified urban investigation areas, thereby providing limited justification for the release of further rural lands. The NSW Government’s 2022 Population Projections has revised down Penrith City’s estimated population, which points to a likely lower demand for housing.</p>
<p>The landholder has previously provided a submission to the draft Local Strategic Planning Statement (LSPS) in 2019 wherein they put forward a proposal for the site to be considered for Environmental Living. The response in the Council meeting minutes at the time suggested that the Local Housing Strategy (LHS) would be required to inform future reviews and updates to planning controls.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>This version of the draft Local Housing Strategy focussed on those development sites and precincts for which there was already planning underway, and a degree of certainty with respect to their future residential potential. As noted above, the Strategy demonstrates that housing demand up to 2036 can be met, thereby</p>

	<p>providing limited justification for the release of further rural lands.</p>
<p>The submitter argues that a hard rural boundary (i.e. the 'Rural Edge' in the draft Rural Lands Strategy) in its current proposed location will be a constraint on meeting future housing supply needs. The submitter argues that Council is only considering Planning Proposals "<i>in hand</i>", and that such an approach is "<i>short-sighted</i>".</p> <p>The submitter argues that with the recent Northern Road upgrade, servicing to support the Aerotropolis and Glenmore Park (GP3) rezonings, the subject land is relatively unconstrained and would be suitable as a future Urban Investigation Area.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council believes the 'Rural Edge' is necessary to protect the important values of rural lands. The District Plan recognises the protection of rural lands through its designation of a MRA.</p> <p>The District Plan requires Council to address housing demand up to 2036, and the Strategy demonstrates that this demand can be met. Longer-term growth areas would need to be considered in future iterations of the Housing Strategy.</p> <p><i>Note: Some of the submitter's comments relating to Rural Lands have been discussed in the Community Engagement Report to the draft Rural Lands Strategy.</i></p>
<p>The submitter notes that the draft Local Housing Strategy identifies that Penrith LGA will likely require significant housing supply to meet population growth forecast in the LGA. The submitter raises concern that outside of Caddens and Orchard Hills, there is limited long term supply for low and medium density housing. They argue that the Strategy relies on increasing densities around centres to accommodate population growth, and that this typically results in apartment supply only.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>This version of the draft Local Housing Strategy focussed on those development sites and precincts for which there was already planning underway, and a degree of certainty with respect to their future residential potential.</p> <p>The draft Local Housing Strategy demonstrates that housing demand up to 2036 can be accommodated in existing urban areas and within identified urban investigation areas, thereby providing limited justification for the release of further rural lands. The NSW Government's 2022 Population Projections has revised down Penrith City's estimated population, which points to a likely lower demand for housing.</p> <p>Orchard Hills and the GPEC area generally is expected to provide a mix of housing densities – low, medium and high. Council is seeing a good supply of medium density housing in areas like Oxley Park. There is</p>

	no reason to believe that new housing will only be in the form of apartments.
The submitter argues that there is limited data suggesting that higher-density is what the greater community wants or needs. They assert that Penrith LGA has historically been a destination for an affordable urban lifestyle with low and medium density highly desired. The likes of Glenmore Park, Jordan Springs and Caddens have recently demonstrated a strong desire for this product type, and as such, future needs should not be ignored or discounted.	Noted. No change to draft Local Housing Strategy.  The draft Local Housing Strategy aims for a diversity of new housing forms and sizes. Low density housing will continue to be delivered in areas such as Orchard Hills.
The submitter argues that their site is ideal for future strategic growth for the following reasons: <ul style="list-style-type: none"> <li>• It is relatively unconstrained from an environmental perspective.</li> <li>• It is in close proximity to the future airport making it highly desirable.</li> <li>• Being a continuation of development along The Northern Road heading south of Glenmore Park it is not out of character for the area. This is further supported as both the aerotropolis precinct plan and the Camden Council growth strategy identify housing development along The Northern Road corridor.</li> <li>• Services are nearby and can be easily extended to the site.</li> <li>• There is opportunity to capitalise on the aerotropolis infrastructure for the Penrith LGA.</li> </ul>	Noted. No change to draft Local Housing Strategy.  The draft Local Housing Strategy demonstrates that housing demand up to 2036 can be accommodated in existing urban areas and within identified urban investigation areas, thereby providing limited justification for the release of further rural lands. Longer-term growth areas may be considered in future iterations of the Local Housing Strategy.
The submitter recommends that the Strategy further consider low-medium density housing supply for the long term forecast and acknowledge that apartment supply near centers is unlikely to meet the entire community's needs in the long term.	Noted. No change to draft Local Housing Strategy.  The draft Local Housing Strategy aims for a diversity of new housing forms and sizes. Low density housing will continue to be delivered in areas such as Orchard Hills.
The submitter recommends that the Rural Edge be moved to exclude the Kings Hill locality (and possibly the entire Northern Road corridor between Glenmore Park and the aerotropolis) until further investigation is	Noted. No change to draft Local Housing Strategy.  The appropriateness of the 'Rural Edge' will be considered by Council in respect to the



<p>completed to identify its ideal long-term use.</p>	<p>draft Rural Lands Strategy, and separate to this draft Local Housing Strategy.</p> <p>Setting aside the Kings Hill locality (or other larger area) for further investigation would raise property owners' expectations, encourage speculation, and create uncertainty. Those potential outcomes are directly contrary to what the two draft Strategies are trying to achieve.</p>
<p>The submitter recommends that the Kings Hill locality be placed into a new category "potential long-term Urban Investigation Area" or similar, to facilitate flexible long-term use to meet the community's needs.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>This draft, and any future iterations of the draft Local Housing Strategy, should only designate a location as an Urban Investigation Area if and when the locality has been adopted as such. The term "potential long-term Urban Investigation Area" is meaningless, and would only serve to generate ambiguity and uncertainty.</p>
<p><b>Private Individual – Submission 5</b></p>	
<p>The submitter represents a major landholder in the area of Wallacia.</p>	<p>Noted. No change to draft Local Housing Strategy.</p>
<p>The draft Local Housing Strategy identifies issues around that the provision of executive housing. The existing provision as well as future opportunities will be impacted as a result of proposed urban development and urban investigation areas.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The draft Local Housing Strategy recognises that Lifestyle and Executive Housing can take different forms, like penthouse apartments and rural-living. The availability of Lifestyle and Executive Housing is not expected to be displaced by urban release areas and urban investigation areas, rather it is highly likely that Lifestyle and Executive Housing would be provided on the periphery of these urban areas to provide a "transition" to rural lands, which will not be developed. An example of this is the proposed E4 Environmental Living zone in Glenmore Park Stage 3.</p>
<p>The Penrith Rural Land Use and Economic Analysis Study identifies that the Rural Residential (lots 0.4 to 2ha in area) accommodate trucks, horses,</p>	<p>Noted. No change to draft Local Housing Strategy.</p>

<p>accommodation, kennels and home businesses. The report identifies a significant portion of this land type in Orchard Hills which is subject to urban investigation. Furthermore, a significant number of similar lot types will be re-developed in Liverpool LGA as a result of urban growth areas causing further shortfall in this lot type which will impact uses that have need for this lot size.</p>	<p>There has been no evidence in the draft Rural Lands Strategy or its supporting studies to suggest that there will be a shortfall of Rural Residential lots (0.4 to 2ha in area).</p> <p>Moreover, Orchard Hills is a large precinct. It is anticipated that some parts of Orchard Hills, far from the Sydney Metro station, will continue to accommodate larger lots.</p>
<p>The Penrith Rural Land Use and Economic Analysis Study concludes that the relocation of agricultural produce industries as a result of urban development, into the Mulgoa Valley is problematic due to land costs. In our opinion creation of additional lots between 1-2ha in locality will provide more viable opportunities for relocation of businesses displaced by urban growth areas.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The availability of land for rural-business should be considered by Council in respect to the draft Rural Lands Strategy, and separate to this draft Local Housing Strategy.</p> <p><i>Note: Some of the submitter's comments relating to Rural Lands have been left for discussion in the Community Engagement Report to the draft Rural Lands Strategy.</i></p>
<p>The submitter requests that Council consider amending the Local Housing Strategy to identify the eastern side of Wallacia, south of Park Road for investigation for executive housing in association with maintaining a rural character, delivery of improved waterway management, biodiversity protection and connectivity between draft Strategic Conservation Areas and Jerrys Creek.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>In respect to the draft Local Housing Strategy, the document demonstrates that housing demand up to 2036 can be accommodated within existing urban areas and urban investigation areas. As such, it is difficult to justify the expansion of residential development into the rural lands.</p> <p>The maintenance of rural character, waterway management and biodiversity protection are likely to be better served by retaining existing rural lands and zoning.</p>
<p>The submitter requests that Council consider amending the Local Housing Strategy to address the reduction of rural residential scale (1-2ha) lots and associated impact on economic activity by providing opportunities for new 1-2ha lots in suitable areas, such as the eastern side of Wallacia, south of Park Road.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The availability of land for rural-business and potential impact on economic activity should be considered by Council in respect to the draft Rural Lands Strategy, and separate to this draft Local Housing Strategy.</p>

	<p><i>Note: Some of the submitter's comments relating to Rural Lands have been left for discussion in the Community Engagement Report to the draft Rural Lands Strategy.</i></p>
<p>The submitter requests that Council consider amending the Local Housing Strategy to encourage engagement with landowners to facilitate rezoning of land use zones and minimum lot size to facilitate new 1-2ha lots.</p> <p>The submitter welcomes an opportunity to discuss the matters raised in this submission further.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>Council endeavours to consult landowners and the community in respect to decisions that affect them. However, amending the current Local Housing Strategy to reference a specific rezoning would not be appropriate. Future iterations of the Strategy may consider further land releases if needed.</p> <p>With respect to further discussions, all community members and stakeholders have an opportunity to make further representations at a Council Meeting or contact the Elected Members of Council. Interested parties are also welcome to contact or meet with Council staff about potential Planning Proposals or planning matters.</p>
<b>Private Individual – Submission 6</b>	
<p>The submitter requests that Berkshire Park, Llandilo and Londonderry be considered for urban housing.</p>	<p>Noted. No change to draft Local Housing Strategy.</p> <p>The issues raised here are dealt with more comprehensively in the Community Engagement Report for the draft Rural Lands Strategy.</p> <p>In respect to the draft Local Housing Strategy, the document demonstrates that housing demand up to 2036 can be accommodated within existing urban areas and urban investigation areas. As such, it is difficult to justify the expansion of residential development into the rural lands of Berkshire Park, Llandilo and Londonderry. It should also be noted that the Western City District Plan identifies a MRA across this locality in which rural land must be protected from urban expansion.</p>

The submitter argues that Berkshire Park, Llandilo and Londonderry is suited to housing for the following reasons:

- Penrith has been designated for population increases, but growing too slowly.
- Blacktown is growing quicker than Penrith.
- The demand for housing is high in the locality.
- The area is accessible to surrounding centres.
- Most of the land is not flood affected.
- Many properties are too small for commercial farming and the soil is unsuitable for farming.
- Agriculture and rural uses are not profitable.
- There is an opportunity to connect to Richmond and Windsor.
- Surrounding development is putting pressure on rural roads, causing long delays.

Noted. No change to draft Local Housing Strategy.

The issues raised here are dealt with more comprehensively in the Community Engagement Report for the draft Rural Lands Strategy.

In respect to the draft Local Housing Strategy, the document demonstrates that housing demand up to 2036 can be accommodated within existing urban areas and urban investigation areas. As such, it is difficult to justify the expansion of residential development into the rural lands of Berkshire Park, Llandilo and Londonderry. It should also be noted that the Western City District Plan identifies a MRA across this locality in which rural land must be protected from urban expansion.