

Social Impact Assessment:

Proposed Boarding House
10-11 Railway Street, Werrington



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This report has been prepared for

Level Architects

by



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Executive Summary

Overview of proposal

The proposed development is a four storey 70 room lifted boarding house, with a maximum capacity of 140 residents including manager, located at **10-11 Railway Street, Werrington** under *State Environmental Planning Policy (Affordable Rental Housing) 2009* (SEPPARH). The proposal site is located in an R3 Medium Density Residential zone and Boarding Houses are permitted with consent. The immediate locality includes Residential flat buildings, Multi dwelling housing (townhouses) and separate houses.

The development includes:

- 70 rooms, each with ensuite, laundry and kitchenette, including 1 double manager's room. All rooms are double rooms, and include 7 accessible rooms;
- Basement parking for 36 cars, 14 motor cycles and 14 bicycles;
- One ground floor indoor common area with kitchen facilities; and
- Private outdoor open space of 39 m² on the north west corner of the site adjacent to the ground floor indoor common living area and two private outdoor spaces in the side setback at the rear of the building.

At maximum capacity, the proposal could accommodate 140 residents, including a couple in the manager's room.

The proposed site is located in good proximity to public transport, just over 200 metres walking distance to Werrington Railway Station providing high frequency services to Penrith, St Marys, Parramatta and Sydney City. The site meets the SEPPARH definition of an accessible area (800 metres from a railway station), although being in an R3 zone, this is not required. Bus services to Penrith and St Marys are available at Werrington Station Bus Stop, 352 metres walking distance from the site.

Shops and other facilities are available at Werrington Shopping Centre, with most daily needs available within 400 metres walking distance. A medical centre and pharmacy are 416 metres from the site and the Post Office is 604 metres from the site. Open space is located within walking distance of the development, including sporting fields and a children's playground. Each of these are located on the other side of the railway line, with disabled access available to shops and open space via a railway over bridge with lifts.

Overview of the Social Impact Assessment

This Social Impact Assessment (SIA) has been prepared by JSA to accompany the Applicant's development application to Penrith City Council. This SIA has assessed the proposal in terms of:

- (i) its accessibility, facilities and design, internal and external amenity and social planning aspects of local character as per best-practice and with regard to compliance with relevant provisions of SEPPARH;
- (ii) relevant provisions of the *Boarding House Act 2012*;
- (iii) the demographic, housing and service context of the locality relevant to the need and demand for Boarding House accommodation; and
- (iv) consultation with nearby residents via survey to understand the locality, identify concerns and to inform mitigations if required.

This assessment process identifies potential benefits/positive impacts and adverse/negative impacts of the proposed development, and provides recommendations to mitigate any identified adverse impacts to the greatest extent possible.

Overview of likely social impacts

Local demography & predicted demography of Boarding House

The SA1 where the proposed boarding house is located is a disadvantaged area compared to both the Penrith LGA average and to Greater Sydney. The SA1 in with the proposed Boarding House is located ranks among the bottom 20% of SA1s in NSW across each of the four SEIFA indices of wellbeing.

The demographic profile of the SA1 is characterised by a young age profile, which includes a large proportion of children and young adults (20-39 years). This suggests a local area with many young families with children. The area also has well above average proportions of those born in Australia. Educational and qualification levels in the area are much lower than the Greater Sydney average; the unemployment rate in the suburb at the time of the 2016 Census was much higher than that for Penrith LGA and Greater Sydney, and household income levels are correspondingly lower.

The dwelling structure of the locality is characterised by high levels of medium density dwelling types (62%) and high levels of flats and units (23%), indicating a relatively high density local context. The level of socially rented housing is three times the Greater Sydney average; and the rate of private rental is also higher than average, likely due to the nature of dwellings in the locality, with correspondingly lower rates of dwellings that are owned outright or with a mortgage.

The proposal site is located in high density hotspots for crime including Assault – non domestic, Assault – domestic, Malicious damage, Theft – break and enter dwelling, and Theft – steal from motor vehicle. It is located in a moderate density hotspot for Theft – Steal from Dwelling and Theft – Motor Vehicle.

While the two-year crime trend in Werrington suburb has been stable, the area has higher than NSW average crime rates for many of the offence types reviewed, with some offence types three and seven times the NSW average rate. This crime context has implications for safety and security of Boarding House residents, and any resident vehicles that are parked on or off site. It also has implications for the management of the Boarding House, as discussed later.

Compared to residents of Werrington suburb, if the proposed Boarding House were to reflect the demography of 'average' boarding houses in Greater Sydney, the boarding house is likely to have larger proportion of males; young adults; those never married, separated or divorced; and those in manager/professional roles than the suburb. There will be a lower proportion of those with a need for assistance (severe disability) compared with Werrington. Labour force participation and income levels are likely to be somewhat lower than the suburb, while the unemployment rate could be higher. Boarding house residents will be more likely than the Werrington population to be attending at educational institution and have higher levels of transience in terms of tenancy turnover.

As such, the proposed boarding house would likely provide flexible accommodation for very low and low income workers, casual or contract workers, students and people on aged pensions.

Affordability

The NSW DCJ *Rent and Sales Report* reported ten bonds for bedsits in the June Quarter 2021 in Penrith LGA, and median rental was not reported. The median one bedroom rental was \$350, which was not affordable to a very low income household.

Based on JSA's recent rental snapshot, we would expect rooms in the proposed boarding house to rent for \$220-\$250 per week, in line with advertised prices for studio apartments and boarding house rooms in the LGA.

Within an approximately **five kilometre radius** of the proposal site there were 58 studio, one and two bedroom properties for rent during the rental snapshot period. Of these 58 properties, 31 would be affordable for **very low** income renters, 57 properties would be available to **low** income households and all properties would be available to **moderate** income households. However, it is noted that many of the lower cost one bedroom apartments or secondary dwellings were older and/or of lower amenity.

At the time of the 2016 Census, 85% of very low income privately renting small households (lone person and couple only) in Penrith LGA were in housing stress compared to 79% Greater Sydney average, with these households comprising 33% of all small privately renting households in the LGA. In absolute terms, there were more than 2,500 very low and low income renting household made up of lone persons and couples without children in housing stress in 2016 in Penrith LGA, and an additional 200 such moderate income households in housing stress. Given projected rates of household growth in the LGA, this would likely be at least 4,500 smaller households in housing stress by 2041 assuming current trends.

At the indicative rent levels rents would be affordable to all low income households and some very low income households. As such, the proposal would make a contribution to alleviating housing stress for very low income and low income private renting households in the Penrith LGA and Greater Sydney context.

As such, in the wider locality of Penrith LGA, there will be significant benefits, or positive impacts, from an increased supply of boarding house accommodation, whether owned/managed by a private agency or social housing provider, in the context of very high rates of housing stress and the large and growing number of smaller very low and low income households in housing stress.

Character and Amenity

Amenity of the Immediate Locality

The amenity of the surrounding locality for boarding house residents is good. It is within close walking distance to public transport, local shops and public open space.

Character of the Immediate Locality

The predominant character of the local area is of older 2-3 storey Residential flat buildings with hip and valley roofs, separate single houses with hip and valley or gable roofs and newly constructed Multi dwelling housing with skillion roofs. Cladding is typically brick and roofs are tiles or corrugated iron in the case of recently constructed Multi dwelling housing.

We are advised by the architect that the proposal has the pitched roof and dormer windows with brick facade and brick roof which is in-line with the character of the neighbourhood.

Potential Amenity Impacts in the Immediate Locality

There are privacy concerns related to the overlooking of windows, balconies and yards in dwellings to the east and rear of the proposed development by windows on the first, second and third floors of the proposed development. We are advised by the architect that the windows shrouds detailed will address the potential overlooking issue on the side elevations.

The location of the common areas is not adjacent to current developments and so usage is unlikely to result in adverse noise impacts.

JSA has not sighted an Acoustic Report for this proposal and would defer to an expert's view with regard to any noise impacts.

Parking and traffic impacts in the Immediate Locality

The development provides on-site parking in two basement levels accessed from Railway Street. The level of parking provided meets the requirements of SEPPARH. At the time of the site visit, there was on-street parking available in Railway Street, although this is likely to be affected by COVID19 restrictions, and the proximity of Werrington Railway Station would be expected to place demand on on-street parking.

The Parking and Traffic Report concludes that there are no traffic or parking related issues that should prevent approval of the subject application.

Within the Boarding House

The internal amenity of the proposed boarding house is good. All rooms contain private bathroom, kitchen and laundry facilities. Rooms are all double rooms with regard to size (excluding bathroom and kitchen areas), generally 16 m², with top floor rooms 22 m² to 25 m². The accessible rooms are 19m² in size. Ground floor rooms all have private court yards.

A common living room of 38 m² is provided for at ground level on the north western corner of the building, adjacent to the common outdoor area on the north western corner of the site, with an

adjacent toilet. Furnishings include a kitchenette, television, lounge seating for eight people and dining seating for three people.

While the common living room meets the requirements of the SEPP, the size is small relative to the number of lodging rooms. A single large room could be dominated by a few lodgers, and consideration should be given to provision of common rooms on each level given the size of the Boarding House and number of rooms on each level, and to avoid potential conflict for use of the space.

A covered 39 m² common outdoor open space area is shown at the north western corner of the building adjacent to the common room and is accessible from the common living room. This area will contain lounge seating for five and table and chairs for six people.

Additional outdoor common space is provided in two areas at the rear of the building in the side setback area. These areas are scaled at 40 m² each, and contain clothes drying racks and landscaping. No seating or shelter is provided.

We are advised that the development will be fenced with 1.8 metre timber fencing.

Boarding House Management

We have not been advised with regard to the proposed management of the boarding house. This is of particular concern given the scale and likely demography of the boarding house. A manager's room is shown on the ground floor, but this is accommodation only, and no office space or cleaning facilities are shown on the drawings.

Issues raised in Resident Survey

Due to Covid 19 restrictions and concerns, a door knock survey was not carried out, as would usually be the case. A letter box drop provided basic information about the proposal, and residents were invited to contact JSA to participate in a survey by phone or to email a completed survey by close of business on 9 September 2021.

Sixty-six surveys were hand- delivered by JSA staff. One response was received, suggesting a low level of community concern regarding the proposed development.¹

The person surveyed was particularly concerned about the size of the boarding house and the difficulty in managing such a large facility. Particular concerns related to the welfare and safety of women and children in the Boarding House and concerns regarding other vulnerable people. Suggested mitigations were to reduce the scale of the boarding house and to ensure management had skills in supporting people, particularly in areas such as mental health and drugs and alcohol.

CPTED Assessment

The CPTED assessment identified a number of areas to improve surveillance and access control. These are identified in the body of the report, and in recommendations.

¹ Similar approaches in other communities surveyed by JSA have led to very high levels of response.

Compliance with SEPPARH

The proposed boarding house is compliant in all areas relevant to this assessment.

Conclusions and Recommendations

Conclusions

The proposed boarding house, with rents that will be affordable to 69 very low and low income lone persons and couples, will contribute significantly to housing choice and diversity for such renters, and will alleviate housing stress, which is large, at a high rate and growing in the LGA. Those accommodated are likely to include very low and low income workers, students and some people on pensions and benefits, although people in JobSeeker or other unemployment benefits are unlikely to be able to afford to live there. Further, the site is well located, and is walkable to high frequency public transport with excellent linkages to employment centres, and to local shops and public open space.

The location of shared private open space is unlikely to result in amenity impacts on neighbours, however seating could be provided to the areas at the rear of the development.

The proposal is generally compliant with the SEPP.

The internal amenity of the proposed boarding house is good. All rooms contain private bathroom, kitchen and laundry facilities. However, the common living room is small relative to the number of lodging rooms, although it is compliant with the SEPP. The boarding house is large, and spread over four levels, so that a common room on each level would be beneficial and likely warranted. The common outdoor space areas at the rear of the development lack seating.

Based on lack of response, there was a low level of concern about the proposal by those in nearby dwellings; although the high crime environment suggests that security measures will be required, with the CPTED assessment identifying matters related to surveillance, access control, territorial reinforcement and space management/maintenance that need to be addressed. There are likely to be amenity impacts on neighbours from overlooking of dwellings to the east and rear of the proposed development by windows on the first, second and third levels, with the architect advising that the shrouds detailed on the drawings will address this.

The scale of the boarding house, with up to 138 residents and possibilities for resident conflicts in relation to shared spaces and concentration of renters in relatively small and homogenous living environment, and likely high tenant turnover, suggests that excellent onsite of management will be required. We have not been advised with regard to the proposed management of the boarding house.

JSA's research² with regard to successful new generation Boarding Houses indicates that the most important aspects of Boarding Houses that are well accepted within the surrounding community are related to good design and amenity; appropriate location and physical integration with the

² Judith Stubbs and Associates (2017) Building Community Support for Community Housing, Toolkit for Providers and Research Reports, Prepared for the Community Housing Industry Association of NSW, Accessible online at <https://communityhousing.org.au/information/resources/>.

surrounding community; and excellence in management, including a detailed Plan of Management, House Rules, transparent complaints procedures, proactive communication with neighbours and on-site management. This will be particularly important in a boarding house of this size, demography and in this locality.

A suitable Plan of Management, House Rules and presence of an onsite manager are likely to provide mitigations to some of the potential social impacts, as well as the potential for privacy and noise impacts to some extent; however the POM and House Rule will be need to be rigorously enforced, particularly if rents decrease to a level where the boarding house is more attractive to a wider range of very low income people in the current market context.

Recommendations

It is recommended that the Applicant:

- Consider designating the majority of rooms as single occupant, noting that this is likely to reflect actual tenure in other local boarding houses, and will reduce the concentration of very low and low income tenants.
- Provide a reception desk and office area (paid Concierge Service/Manager) at the front entrance to enhance surveillance of people coming and going and to improve security, with someone in attendance from 8 am to 10 pm each day.
- Provide a live-in onsite manager, who could be a remunerated tenant, on call for hours outside of the 8 am to 10 pm Concierge service.
- Provide secure access to the building, car parks and lifts.
- Provide a common living area on each level, with appropriate fittings and furnishings.
- Implement additional security measures including:
 - Provision of Concierge desk (see above)
 - Provision of CCTV system to car park and corridor areas
 - Consider amending plans to remove dead end corridors
 - Provide permanent lighting to public areas and to the front entrance area
 - Provide windows to doors accessing stairs, front escape stairs, garbage room, common room and access to outdoor common space
 - Provide secure entry to the building and to the car park area
- Provide a Plan of Management and House Rules, ensuring provision for:
 - Excellent on-site management with appropriate and transparent complaints and response procedures;
 - Maintenance procedures;
 - Care in the selection and screening of tenants, including awareness of the need to accommodate a diversity of tenures with regard to income, employment or student status; and other provisions related to accommodation of children should this occur;

- Hours of operation of relevant spaces to ensure noise and privacy impacts are avoided;
- Provision for both short-term (3 month) of longer-term (6-12 months) Occupancy Agreements to increase stability and reduce turnover; and
- Strict House Rules, with appropriate penalties for non-compliance.

1 The Proposal

1.1 Description of proposal

The proposed development is a four storey 70 room boarding house, with a maximum capacity of 140 residents including manager, located at **10-11 Railway Street, Werrington**. The development includes:

- 70 rooms, each with ensuite, laundry and kitchenette, including 1 double manager's room. All rooms are double rooms, and include 7 accessible rooms;
- Basement parking for 36 cars, 14 motor cycles and 14 bicycles;
- One ground floor indoor common area with kitchen facilities; and
- Private outdoor open space of 39 m² on the north west corner of the site adjacent to the ground floor indoor common living area and two private outdoor spaces in the side setback at the rear of the building.

1.2 Demographic context of the locality

The SA1 where the proposed boarding house is located is characterised as a disadvantaged area compared to both the Penrith LGA average and to Greater Sydney.

The SA1 area around the proposal site ranks among the bottom 20% of SA1's in NSW across each of the four SEIFA indices. However, the SA1 has lower levels of disadvantage than the Werrington suburb in the areas of Economic Resources and Education and Occupation. The Werrington suburb is among the most disadvantaged 10% of suburbs in NSW for index of relative socio-economic disadvantage, advantage and disadvantage, education and occupation and economic resources.

The SA1 of the proposal site, 1146219, has a greater proportion of females and younger age structure compared to Werrington suburb, Penrith LGA and Greater Sydney; as does Werrington suburb compared to Penrith LGA and Greater Sydney. The SA1, Werrington suburb and Penrith LGA have higher proportions of residents from an Indigenous background compared to Greater Sydney, between 4-5% of these populations compared to 1.5%. Werrington suburb has a higher proportion of those in need of assistance with a core daily activity at 6.2% of residents compared to the SA1 (5.3%), Penrith LGA (5.5%) and Greater Sydney (5.2%).

The SA1, Werrington Suburb and Penrith LGA are characterised by high proportions of those born in Australia (67%, 70% and 72% respectively) compared with Greater Sydney (57%). Predominate countries of birth amongst SA1 resident population include Philippines, India, New Zealand and Nepal which is a similar profile to the suburb and LGA.

The SA1 has similar levels of post-schooling qualifications to Werrington suburb and Penrith LGA, which are below Greater Sydney. Between 9-11% of residents hold a Bachelor's Degree is

the SA1, suburb or LGA compared to 22% for the Greater Sydney average; correspondingly larger proportions of residents in these areas hold Certificate Level qualifications than average.

School completion rates are lower in the SA1 compared to Greater Sydney but higher than the suburb and LGA, with 55% of residents completing Year 12 in the SA1 compared with 65% for Greater Sydney.

The SA1 has a similar proportion of those not in the labour force at 32% compared to the Werrington suburb (33%), Penrith LGA (31%) and Greater Sydney (34%). As at the 2016 Census, the unemployment rate in the SA1 and Werrington suburb was 9.0%, greater than the LGA at 5.7% and Greater Sydney at 6%.

The main industries of employment in the SA1 are health care and social assistance, retail trade, public administration and safety and transport, postal and warehousing. The main industries in Werrington suburb are health care and social assistance, retail trade, construction and manufacturing.

Personal income levels are higher in the SA1 than the Werrington suburb, but below the Penrith LGA and Greater Sydney. Household income levels in the SA1 are below the Werrington suburb, and further below the Penrith LGA and Greater Sydney averages.

The SA1 is characterised by high levels of medium density housing forms (62%) compared to all benchmarks and high levels of flats and units (23%) compared to the LGA, showing a relatively high density area. Werrington suburb has higher densities than Greater Sydney, with fewer dwellings as separate houses. Penrith LGA is very low density compared to all areas, with 80% of dwellings as separate houses.

The SA1 and suburb have lower levels of ownership (52%) compared to the LGA (68%) and Greater Sydney (64%). Social rental is particularly high in the SA1 (15%) and in the suburb (11%) compared to the LGA and Greater Sydney (5%).

The SA1 and suburb have a lower level of car ownership (87% and 89%) compared to the LGA (94%) but similar to Greater Sydney.

This is looked at in detail in **Appendix A**.

1.3 Description of site and immediate surrounds

The proposal site at 10-11 Railway Street Werrington is located within an **R3 Medium Density Residential** zoned area as per the Penrith Local Environmental Plan 2010.

A visit to the proposed site and its immediate surrounds was undertaken by JSA researcher Colleen John Storer on Wednesday 6 September 2021 as part of the field work conducted for this Social Impact Assessment. Actual walking distance measurements were undertaken using a Bosch Professional GWM 32 trundle wheel.

The proposal site is currently vacant.



Figure 1.1: The site (10-11 Railway St Werrington), adjacent two and three storey residential flat buildings

Source: JSA, 2021

Surrounding uses consist of:

- Vacant land in the railway reserve opposite across Railway Street;
- Vacant land to the west;
- Two storey residential flat building with undercroft parking to the east; and
- Two storey residential flat building to the rear.

There are two social housing developments in the precinct; 6 Railway Street and 16 Rance Street.

Proximate land uses are shown in the figures below.



Figure 1.2: Multi dwelling housing (Social housing), 6 Railway Street

Source: JSA, 2021



Figure 1.3: Multi dwelling housing (Social housing), 16 Rance Street

Source: JSA, 2021



Figure 1.4: Separate Housing Rance Street

Source: JSA, 2021



Figure 1.5: Residential Flat Building to east of site

Source: JSA, 2021



Figure 1.6: Residential Flat Building and Multi Dwelling Housing to rear of site

Source: JSA, 2021

1.4 Locality Map

The proposal site is located in relatively close proximity to public transport (Werrington Railway Station and Werrington Station Bus Stop), open space at Rance Oval and shops and services at Werrington Shopping Centre.

The map and table below show the location and walking distance of these points of interest.



Figure 1.7: Immediate Locality Map surrounding Proposal Site at 10-11 Railway Street Werrington

Source: JSA, 2021 using Google Maps

Table 1.1: Walking Distances from 10-11 Railway Street to Points of interest in the local area

Place of Interest	Walking Distance from proposal site	Details
Werrington Railway Station	208 metres	Services: <ul style="list-style-type: none"> - Eastbound to St Marys, Parramatta and Sydney City - Westbound to Penrith
Werrington Station Bus Stop (ID 2747210).	352 metres	Services: <ul style="list-style-type: none"> - 782 to Penrith and St Marys - 783 to Penrith - 785 to Penrith
Rance Oval	380 metres	Public reserve with playing fields and toilets
Cafe	370 metres	
Baker	378 metres	
Supermarket/Convenience Store	398 metres	
Medical Centre/Pharmacy	416 metres	
Bottle Shop	437 metres	
Post Office	604 metres	

Source: JSA, 2020

1.5 Businesses and services in the locality

A range of shops providing daily needs are located at Werrington Shopping Centre, between 370 and 604 metres from the proposed development using the railway overbridge. A paved footpath with pram ramps is available along Railway Street connection to the railway station and Werrington Shopping Centre. The railway overbridge has disabled access.



Figure 1.8: Werrington Shopping Centre

Source: JSA, 2021

A wider range of services are available at Penrith and at St Marys, with both accessible by public transport.

1.6 Public transport accessibility

Trains are available from Werrington Railway Station, providing services on the T1 line. Services operate between 3 am and midnight, seven days a week. Weekday services operate eight times an hour in peak periods and four times during the day, with reduced frequency on weekends and public holidays.



Figure 1.9: Werrington Railway Station showing disabled access

Source: JSA, 2021

Buses are available from the bus stop located on Kazanis Court, **352 metres** walking distance from the proposal site, with access to services 782 to Penrith and St Marys and 783 and 785 to Penrith.

The 782 typically operates hourly between 5 am and 9 pm, the 783 typically operates hourly between 5 am and 9 pm with higher frequencies during peak hours and the 785 typically operates hourly between 5 am and 9 pm with higher frequencies during peak hours.

1.7 Open space

Rance Oval is accessed via the Railway overbridge. The reserve includes a cricket pitch, amenities, basketball court and playground.



Figure 1.10: Rance Oval

Source: JSA, 2021

1.8 Pedestrian and car movements

At the time of the site visit, the morning of Monday 6 September, Railway Street was observed to be a quiet with regard to vehicle and pedestrian movements, and with little of the onstreet parking utilised. The site visit was undertaken during COVID19 restrictions, and there may be demand from parking from commuters using the nearby Werrington Railway Station in more normal times.

1.9 Character of the area

Clause 30A of *SEPP (Affordable Rental Housing) 2009* requires Council to consider whether the design of the development is compatible with the character of the local area. Character is understood to primarily consist of the relationship to other buildings with respect to building height, setbacks and landscaping and other physical aspects, although there are often quite subjective elements related to this test.

The predominant character of the local area is of older 2-3 storey residential flat buildings with hip and valley roofs, separate single houses with hip and valley or gable roofs and newly constructed multi dwelling housing with skillion roofs. Cladding is typically brick and roofs are tiles or corrugated iron in the case of recently constructed multi dwelling housing.

We are advised by the architect that the proposal has the pitched roof and dormer windows with brick facade and brick roof which is in-line with the character of the neighbourhood.

2 Relevant Legislation

2.1 Compliance with State Environmental Planning Policy (Affordable Rental Housing) 2009

2.1.1 General

As Boarding Houses are permitted with consent in R3 zones under Penrith Local Environmental Plan 2010, the relevant application of *State Environmental Planning Policy (Affordable Rental Housing) 2009 (SEPPARH)* is in relation to design standards specific to Boarding Houses and to good practice as per Division 3. The proposal is not required to comply with other Divisions of the SEPPARH, however some aspects (such as the accessibility of the area) are included here for completeness of the Social Impact Assessment.

2.1.2 Accessibility of the area

As the proposal site is in an R3 zoned area, accessibility of the area is not expressly required by the SEPPARH; however, it is a consideration of this SIA.

The Penrith LGA is within the **Greater Sydney Region**.

A development is in an accessible area if it is within:

(a) 800 metres walking distance of a public entrance to a railway station or a wharf from which a Sydney Ferries ferry service operates, or

(b) 400 metres walking distance of a public entrance to a light rail station or, in the case of a light rail station with no entrance, 400 metres walking distance of a platform of the light rail station, or

(c) 400 metres walking distance of a bus stop used by a regular bus service (within the meaning of the Passenger Transport Act 1990) that has at least one bus per hour servicing the bus stop between 06.00 and 21.00 each day from Monday to Friday (both days inclusive) and between 08.00 and 18.00 on each Saturday and Sunday.

As the proposed development is 208 metres from Werrington Railway Station, it meets the criteria of Clause 4(1)(c) of the SEPP as set out above and is **within an accessible area**.

2.1.3 Private Open Space Requirements

Clause 29(2)(d) of *SEPPARH* gives the following standards regarding the provision of private open space areas.

- (i) One area of at least 20 square metres with a minimum dimension of three metres is provided for the use of the lodgers,

- (ii) If accommodation is provided on site for a Boarding House manager – one area of at least eight square metres with a minimum dimension of 2.5 metres is provided adjacent to that accommodation.

Plans reviewed include a private open space area of 39 m² in the northern facing front set back of the lot. The private open space is adjacent to the common living room.

The proposed Boarding House, with 69 rooms and a maximum capacity of 138 lodgers, requires the provision of on-site accommodation for a manager. The proposal includes a manager's room at ground level with adjoining private outdoor space of 15 m² adjacent to the room.

2.1.4 Onsite Parking Requirements

Clause 29(2)(e) of SEPPARH sets out the following standards regarding provision of onsite car parking spaces:

- (i) in the case of development carried out by or on behalf of a social housing provider in an accessible area – at least 0.2 parking spaces are provided for each boarding room, and
- (ii) in the case of development carried out by or on behalf of a social housing provider not in an accessible area – at least 0.4 parking spaces are provided for each boarding room, and
 - (iia) in the case of development not carried out by or on behalf of a social housing provider – at least 0.5 parking spaces are provided for each boarding room, and*
 - (iii) in the case of any development – not more than 1 parking space is provided for each person employed in connection with the development and who is resident on site

As the development is not being carried out by or on behalf of a social housing provider, the number of car parking spaces required onsite to comply with Clause 29(e)(iia) of the SEPPARH is 0.5 per boarding room (i.e. 0.5 x 69 lodger rooms = 35 lodger spaces), plus one manager's space as per Clause 29(e)(iii).

The plans comply with the provisions of SEPPARH with **36 on-site car parking spaces**.

SEPPARH 2009 also requires the following:

Clause 30(1)(h) at least one parking space will be provided for a bicycle and one will be provided for a motorcycle, for every 5 boarding rooms.

The plans for the proposed Boarding House provide for **14 motor bike spaces** and **14 bicycle spaces**, which is also compliant with the SEPPARH requirements for 14 motorbike and 14 bicycle spaces (i.e. 69/5 = 13.8 spaces).

2.1.5 Accommodation Size

Clause 29(2)(f) of SEPPARH requires that boarding rooms be a minimum of 12m² for single rooms and 16m² for double rooms, excluding kitchen or bathroom facilities.

Plans provided show that all rooms meet the minimum accommodation sizes of the SEPP.

2.1.6 Other Requirements for Boarding Houses

SEPPARH 2009 sets out several other requirements for Boarding Houses in Clause 30(1).

Communal living area

The proposed Boarding House plans meet the requirements in subclause (a) that a Boarding House with five or more boarding rooms must have at least one communal living area.

Plans show one indoor communal area at ground level with kitchen facilities and toilet of 61 m² in size. No details are provided for inclusions.

Maximum floor area, number of lodgers per room,

The proposed Boarding House plans show that the gross floor area of all boarding rooms (excluding bathroom and kitchen facilities) are less than 25m², as required by the SEPP.

Subclause (c) states that boarding rooms are to be occupied by no more than two lodgers. The rooms proposed are configured to suit couples.

Adequate kitchen & bathroom facilities

Subclause (d) states that adequate bathroom and kitchen facilities will be available within the Boarding House for use of each lodger.

All 69 rooms will be fully self-contained with kitchen and bathroom facilities. Details of kitchen and bathroom inclusions are not shown on the drawings.

- In-room bathroom facilities will include toilet, basin and shower;
- In-room kitchen facilities will include sink, two-burner cooktop, refrigerator, microwave, kettle, bench space and storage cupboards;

Additional common kitchen facilities are provided in the ground floor common area.

2.2 Penrith Local Environmental Plan 2010

Under the Penrith Local Environmental Plan 2010 (PLEP 2010), the land at 10-11 Railway Street, Werrington is zoned as **R3 Medium Density Residential**. Under this zoning, Boarding Houses are permitted with consent.

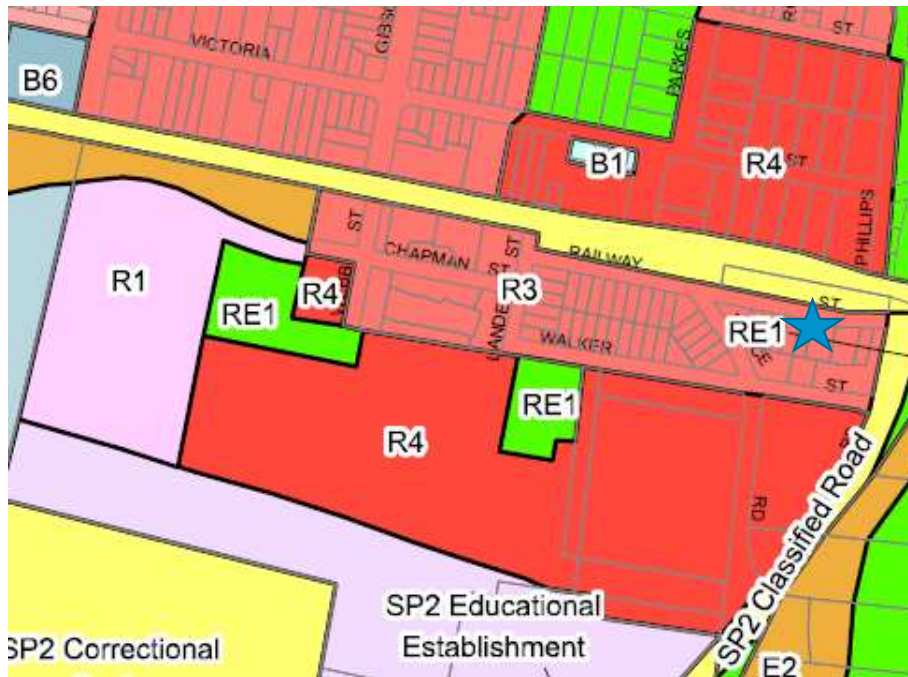


Figure 2.1: Zoning Map, Penrith LEP 2010, 10-11 Railway St Werrington shown with star
 Source: Penrith LEP 2010

Height limit for the proposal site is 8.5 metres as per the Height of Buildings Map in the Penrith LEP 2010.



Figure 2.2: Height of Buildings Map, Penrith LEP 2010,
 Source: Penrith LEP 2010

2.3 Penrith Development Control Plan 2014

The Penrith Development Control Plan 2014, Chapter D5 Other Land Uses, Section 5.11 Boarding Houses provides supplementary directions for Boarding Houses to the SEPPARH and general controls elsewhere in the DCP.³

This section of the DCP includes controls related to local character, built form, scale and appearance, tenant amenity, safety and privacy, visual and acoustic amenity impacts, location and a proposal's plan of management.

This Assessment has reviewed the proposed boarding house plans against the relevant considerations contained in this Section of the DCP that relate to social planning. The proposed Plan of Management has not been provided for review.

2.4 Boarding Houses Act 2012

The proposed boarding house is a registrable Boarding House within the meaning of part 1, section 5 of the Boarding Houses Act 2012. Consequently, a range of provisions of the Boarding Houses Act 2012 are applicable to the development, including inspections by council and the requirement to enter into Occupancy Agreements.

We understand that the proposed boarding house will be a general Boarding House under the Boarding House Act, and consequently will not house more than one person with additional needs.⁴

*1) For the purposes of this Act, a person is a **person with additional needs** if:*

(a) the person has any one or more of the following conditions:

(i) an age related frailty,

(ii) a mental illness within the meaning of the Mental Health Act 2007,

(iii) a disability (however arising and whether or not of a chronic episodic nature) that is attributable to an intellectual, psychiatric, sensory, physical or like impairment or to a combination of such impairments, and

(b) the condition is permanent or likely to be permanent, and

(c) the condition results in the need for care or support services (whether or not of an ongoing nature) involving assistance with, or supervision of, daily tasks and personal care such as (but not limited to) showering or bathing, the preparation of meals and the management of medication.⁵

³ Penrith City Council (2014) Penrith Development Control Plan, D5 Other Land Uses, 5.11 Boarding Houses, Pg 25.

⁴ Boarding House Act, clause 37(1).

⁵ Boarding House Act, clause 36.

Under the Act, the proprietor is required to notify the Commissioner of a range of particulars with respect to the development.

Under Clause 17 of the Act, Council has the power to carry out inspections of the premises.

Under Clause 28 of the Act, the Proprietor is required to enter into a written occupancy agreement with each lodger.

3 Demographic and Housing Context

3.1 Comparative Demography of the Boarding House

The proposed Boarding House will have 70 double rooms. At capacity the Boarding House will have a maximum of 140 residents, including a couple in the manager's room.

We have used data from the Australian Bureau of Statistics' Census of Population and Housing 2016 for Boarding House residents (i.e. those enumerated in 'Boarding House, private hotel') in Greater Sydney as this provides more reliable data due to the number of such residents compared with the locality. Assuming that the population of this Boarding House will be similar to the population of Boarding House residents for the Greater Sydney Capital City Statistical Area, the following profile is likely compared to the surrounding area of the Werrington Suburb:

- (v) Larger proportion of males
- (vi) Larger proportion of young adults (18-24 years)
- (vii) Much higher proportion of those never married
- (viii) Somewhat lower weekly personal income levels
- (ix) Lower level of labour force participation, smaller proportion of those employed and higher unemployment rate, although this will depend on rental costs and affordability of boarding house rooms for unemployed persons with very low income levels
- (x) Equivalent levels of occupation in trades/technical roles among those employed
- (xi) Higher levels of occupation in manager/professional roles among those employed
- (xii) Higher levels of attendance of an educational institution
- (xiii) Lower levels of need for assistance
- (xiv) Higher levels of transience

Details are shown in the table below.

Table 3.1: Predicted demography of residents of proposed Boarding House using Boarding House residents in Greater Sydney as a proxy compared to Werrington suburb

	Werrington Suburb	Proposed Boarding House	Boarding House Residents in Greater Sydney
	Proportion	Likely # BH residents when at capacity	Proportion
Males	45.8%	94	67.2%
Age 18-24 years	9.6%	31	21.9%
Age 25-39 years	26.8%	38	27.0%
Age 40-54 years	18.6%	31	21.9%
Age 55-69 years	14.9%	30	21.1%
Aged 70+ years	6.3%	9	6.2%
Aged 20-69 years	67.4%	122	86.8%
Never married (aged 15+ years)	41.4%	98	70.3%
Separated or divorced (aged 15+ years)	15.8%	23	16.6%
Median total weekly personal income	\$643	\$505	\$505
Unemployment rate	9.0%	27	19.0%
Not in labour force	33.1%	60	42.5%
Employed	62.8%	65	46.7%
Work as trades or technical, machinery operator, labourer (% of workers 2016)	40.0%	59	42.4%
Work as manager or professional (% of workers 2016)	21.5%	35	24.9%
Attending educational institution (aged 20+) (2016)	9.2%	37	26.7%
Attending technical or further educational institution, university or other tertiary institution (all ages) (2016)	6.6%	24	16.9%
Needs assistance with core daily activities (disabled) (2016)	6.2%	6	4.5%
Will change address in less than one year (2016)	19.9%	53	37.8%
Will change address in less than five years (2016)	47.9%	92	65.8%

Source: JSA, calculations 2020, based on data from ABS (2016) Census of Population and Housing, Table Builder.

If the proposed Boarding House were to reflect the demography and occupancy of ‘average’ Boarding Houses in Greater Sydney, it is also likely that it would provide flexible and more long-term accommodation for very low and low income workers, students and people on aged pensions and on benefits. The likely rents would also make rooms attractive and affordable to low income singles and couples and to some very low income households.

3.2 Rental Affordability

3.2.1 Overview

Given the application for the proposed Boarding House is being made with regard to the provisions of *SEPP Affordable Rental Housing 2009* (SEPPARH) it is relevant to consider the housing affordability context of the locality, and the extent to which the proposed Boarding House in this locality is likely to contribute to the stock of affordable rental dwellings.

Although there is no requirement for Boarding House rooms to be affordable (unlike definitions for ‘affordable rental housing’ elsewhere in SEPPARH), there is a presumption that Boarding Houses will in fact be affordable by virtue of the reduced size and standards such as car parking that apply to such accommodation under the SEPP. The extent to which the proposed Boarding House will contribute to the stock of affordable rental stock in the locality also goes to the question of the likely benefit of the proposed development.

This section therefore sets out relevant affordability benchmarks in accordance with relevant legislation, provides an overview of the affordability context of the locality, and predicts the likely affordability of the proposed Boarding House rooms in this context.

3.2.2 Affordable Rental Housing Definition and Benchmarks

Housing is generally considered to be ‘affordable’ when households that are renting or purchasing are able to meet their housing costs and still have sufficient income to pay for other basic needs such as food, clothing, transport, medical care and education.

‘Affordable housing’ has a statutory definition under the NSW Environmental Planning and Assessment Act 1979 (NSW), being housing for very low, low or moderate income households, where ‘very low-income’ households as those on less than 50% of median household income; ‘low-income’ households’ as those on 50-80% of median household income, and ‘moderate-income’ households as those on 80-120% of median household income for Greater Sydney (referred to as ‘Greater Sydney Statistical Area’ in 2016 ABS Census of Population and Housing).

As a commonly used rule of thumb, housing is considered to be affordable where households pay no more than 30% of their gross household income on their rent or mortgage payments. This is often regarded as the point at which such households are at risk of having insufficient income to meet other living costs, and deemed to be in ‘housing stress’. Those paying more than 50% of gross income are regarded as being in ‘severe housing stress’.

The following table provides benchmarks that are used in this policy when referring to ‘affordable housing’, in June Quarter 2021 dollars, and are consistent with relevant NSW legislation.

Table 3-2: Affordable Housing Income and Rental Benchmarks - Greater Sydney

	Very Low Income Household	Low Income Household	Moderate Income Household
Income Benchmark	<50% of Gross Median Household Income for Greater Sydney	50%-80% of Gross Median Household Income for Greater Sydney	80%-120% of Gross Median Household Income for Greater Sydney
Income Range (2)	<\$950 per week	\$951-\$1,520 per week	\$1,521-\$2,280 per week
Affordable Rental Benchmarks (3)	<\$285 per week	\$286-\$456 per week	\$457-\$684 per week

Source: JSA 2021, based on data from ABS (2016) Census of Population and Housing, ABS (2021) Consumer Price Index, indexed to June Quarter 2021 dollars

- (1) All values reported are in June Quarter 2021 dollars
- (2) Total weekly household income
- (3) Calculated as 30% of total household income

It can be seen from the above that for rental to be ‘affordable’ under statutory definitions, rental would need to be **less than \$285 per week** for a very low income household, between **\$286 and \$456 per week** for a low income household, and between **\$457 and \$684 per week** for a moderate income household as per the **Greater Sydney benchmarks**.

3.2.3 The Local Affordability Context

For the June Quarter 2021, there were ten or less new bonds registered for bedsitters in the Penrith LGA, and a total of 94 bonds held. The median rental for a bedsitter in Greater Sydney is \$330, more expensive than a first quartile two-bedroom property in the Penrith LGA at \$310.

The median rental price for new bonds for single bedroom flats and units in the Penrith LGA was well below the median for Greater Sydney at \$350 compared with \$460. The median rental price for two bedroom flats and units in Penrith LGA was also below Greater Sydney at \$370 compared to \$475, with similar trends at the lower and upper ends of the market.

Penrith LGA is a more ‘affordable’ area than the Greater Sydney average, however it remains out of reach or ‘unaffordable’ by definition for most households on very low incomes. This group would find it very difficult to find affordable rental accommodation in Penrith LGA, even for bedsits and single bedroom apartments at the lower end of the market. Very low income households requiring affordable rents less than \$268 per week are largely excluded from the local market.

The affordability situation for different income groups, using the above benchmarks, for various smaller housing products in Penrith LGA and Greater Sydney are shown in the table below.

Table 3-3: Weekly rents for new bonds for bedsitters (total), one and two bedroom flats and units in Penrith LGA and Greater Metropolitan Region

		Bedsitter (Total)			One Bedroom Flats & Units			Two Bedroom Flats & Units		
		First Quartile	Median	Third Quartile	First Quartile	Median	Third Quartile	First Quartile	Median	Third Quartile
Penrith LGA	Weekly rent	-	-	-	\$268	\$350	\$380	\$310	\$370	\$420
	Affordability				Affordable to upper 6% of very low income band	Affordable to upper 62% of low income band	Affordable to upper 44% of low income band	Affordable to upper 86% of low income band	Affordable to upper 51% of low income band	Affordable to upper 21% of low income band
Greater Metropolitan Region	Weekly rent	\$280	\$330	\$400	\$370	\$460	\$580	\$375	\$475	\$600
	Affordability	Affordable to upper 2% of very low income band	Affordable to upper 74% of low income band	Affordable to upper 33% of low income band	Affordable to upper 51% of low income band	Affordable to upper 99% of moderate income band	Affordable to upper 46% of moderate income band	Affordable to upper 48% of low income band	Affordable to upper 92% of moderate income band	Affordable to upper 37% of moderate income band

Source: Department of Communities & Justice, Rent & Sales Report No 136, Rent Tables June Quarter 2021, JSA calculations

3.2.4 Rental Stress – Lone Person & Couple Only Households Renting Privately

As at the time of the 2016 ABS Census, the rate of rental stress for lone person and couple only households (small households) renting privately in the Penrith LGA is lower than the rate for Greater Sydney (58% compared with 67%).

Levels of rental stress for very low income privately renting small households are higher in Penrith LGA than for Greater Sydney (85% compared to 79%), with such households making up a greater proportion of all small private renting households (33% in Penrith LGA compared to 25% in Greater Sydney).

Levels of rental stress for low income privately renting small households are lower in Penrith LGA than for Greater Sydney (59% compared to 75%), and levels of rental stress for moderate income privately renting small households are much lower in Penrith compared to Greater Sydney (14% compared to 42%).

This analysis suggests that whilst private rental housing in the Penrith LGA is likely to be affordable for a large proportion of lone person and couple only households renting privately earning moderate or higher incomes, there is a shortage of affordable private rental housing for low and very low income singles and couples – particularly very low income earners where 53% of these households were in severe stress at the time of the Census.

Table 3-4: Rental Stress, Lone Person & Couple Only Households Renting Privately, Penrith LGA compared with Greater Sydney, 2016

Lone Person & Couple Only Households Renting Privately	Penrith LGA		Greater Sydney
	No.	5,940 households	203,958 households
Very low, low and moderate income	4,650	78% of all privately renting lone person & couple only households	61% of all privately renting lone person & couple only households
Not in Stress	1,929	41%	33%
Moderate Stress	1,647	35%	37%
Severe Stress	1,074	23%	29%
Total Stress	2,721	58%	67%
Very Low Income	1,934	33% of all privately renting lone person & couple only households	25% of all privately renting lone person & couple only households
Not in Stress	295	15%	21%
Moderate Stress	614	32%	20%
Severe Stress	1,026	53%	59%

Lone Person & Couple Only Households Renting Privately	Penrith LGA		Greater Sydney
	No.	5,940 households	203,958 households
Total Stress	1,639	85%	79%
Low Income	1,564	26% of all privately renting lone person & couple only households	19% of all privately renting lone person & couple only households
Not in Stress	641	41%	25%
Moderate Stress	876	56%	58%
Severe Stress	47	3%	17%
Total Stress	923	59%	75%
Moderate Income	1,152	19% of all privately renting lone person & couple only households	18% of all privately renting lone person & couple only households
Not in Stress	994	86%	58%
Moderate Stress	157	14%	39%
Severe Stress	1	0%	3%
Total Stress	158	14%	42%
Very Low and Low Income	3,498	59% of all privately renting lone person & couple only households	43% of all privately renting lone person & couple only households
Not in Stress	936	27%	23%
Moderate Stress	1,490	43%	36%
Severe Stress	1,073	31%	41%
Total Stress	2,562	73%	77%
Higher Income Households	1,290	22% of all privately renting lone person & couple only households	39% of all privately renting lone person & couple only households

Source: JSA, calculations 2020, based on data from ABS Census of Population and Housing 2016

3.2.5 Groups that would benefit from the proposal

The proposed Boarding House has the potential to be a significant benefit to very low and low income lone person and couple only private renters that are currently experiencing moderate and severe housing stress, including very low and low income workers and students, and people on

pensions and benefits, particularly if rental costs for the proposed development are set at prices that are genuinely affordable for these key groups in locality.

3.3 Existing Boarding House Accommodation

Across the Penrith LGA on Census night 2016, there were a total of 24 persons enumerated in a 'Boarding House, private hotel', representing 0.01% of the resident population of the area. In 2016, the ABS data indicated that there were 3 'Boarding House, private hotels' in the Penrith LGA, but no Boarding Houses/private hotels were enumerated in Werrington Suburb. By comparison, 0.15% of the population of Greater Sydney was counted in Boarding Houses or private hotels at this time, suggesting that Penrith LGA is significantly under supplied with this form of accommodation.

The NSW Department of Fair Trading Boarding House Register shows ten (General Registerable) Boarding House registered in the Penrith LGA including seven registered Boarding Houses in the Kingswood suburb and three in St Marys /North St Marys.⁶

3.4 Social Housing

At the time of the 2016 Census, the supply of social housing in the Penrith LGA at 4.8% of occupied private dwellings is equivalent to the Greater Sydney average of 4.6%.

In 2016, there were around 2,969 social housing dwellings in the Penrith LGA, including 2,609 (88%) rented through the Department of Communities and Justice and 360 (12%) rented through a housing co-operative, community or church group.

Of these social housing dwellings, 18% were one bedrooms or bedsits. Around 91% percent of these one bedroom and bedsit dwellings were occupied by single persons, 3% were occupied by single parent families and 4% by couples without children.⁷

The Werrington suburb has a much higher rate of social housing dwellings compared to Greater Sydney, with 137 social housing dwellings or 9.2% of all dwellings in the suburb.

The SA1 in which the proposed boarding house is located had 36 social housing dwellings enumerated at the 2016 Census, 14.9% of occupied private dwellings.

⁶ NSW Fair Trading, Boarding House Register, <http://parkspr.fairtrading.nsw.gov.au/BoardingHouse.aspx>, accessed 8/9/2021.

⁷ ABS (2016) Census of Population and Housing, Place of Enumeration, accessed via Table Builder.

3.5 Snapshot of rental opportunities in Werrington and surrounding suburbs

A search of www.domain.com.au was conducted on 8 September, 2021 for studio, one and two bedroom apartments (including granny flats and villas) in Werrington and suburbs within approximately five kilometres of the proposed site. These suburbs included St Marys, North St Marys, Ropes Crossing, Kingswood, Jordan Springs, Colyton and Cambridge Park.

In the suburb of **Werrington** there was no **studio** or **one bedroom** accommodation advertised. Four **two bedroom** apartments were available. The median rental was \$310.00 per week with first quartile rental being \$288.00 and third quartile rental \$326.00 per week. These four properties made up 27% of all rental stock in Werrington. One of these two bedroom units would be affordable to the upper range of **very low** income households, whilst the balance would be affordable to **low** and **moderate** income households.⁸

Within an approximately **five kilometre radius** of the proposal site there were an additional 58 studio, one and two bedroom properties for rent.

Seven **studio** properties were available with a median rental of \$250.00 per week. Four of these studios were located within registered boarding houses, with rents ranging from \$180 to \$260.

Ten **one bedroom** properties were advertised (made up of three granny flats, two villas and five apartments) with a median rent of \$258.00.

Forty-one **two bedroom** units were located with a median rental of \$300.00 per week.

These 58 properties comprised 34% of all the surrounding rental stock. Of these 58 properties, 31 would be affordable for **very low** income renters, 57 properties would be available to **low** income households and all properties would be available to **moderate** income households.⁹

In the Penrith LGA the Rent and Sales Report for June Quarter 2021¹⁰ did not report a median rental for studio accommodation flats/units. **Median rental** for a one bedroom unit was **\$350.00** and for a two bedroom unit **\$370.00**.¹¹

3.6 Affordability of Proposed Boarding House

We have been advised by the Applicant that the average rental cost for a boarding house room will be \$300-320. This rent will be affordable to 85% of low income households.

⁸ JSA 2021 based on data from ABS (2016) Census of Population and Housing, ABS (2021) Consumer Price Index, indexed to June Quarter 2021 dollars

⁹ JSA 2021 based on data from ABS (2016) Census of Population and Housing, ABS (2021) Consumer Price Index, indexed to June Quarter 2021 dollars

¹⁰ Department of Communities & Justice, Rent and Sales Report – Interactive Dashboard, www.facs.nsw.gov.au/resources/statistics/rent-and-sales/dashboard

¹¹ JSA 2020 based on data from ABS (2016) Census of Population and Housing, ABS (2020) Consumer Price Index, indexed to March Quarter 2020 dollars

Based on the rental snapshot, we would expect rooms in the proposed boarding house to rent for \$220-\$250 per week.

These rents would be affordable to all low income households and some very low income households.

Given the affordability context of the Penrith LGA, which includes high levels of housing stress among very low income private renting single and couple households, this would be a benefit of the project.

4 Crime context

NSW Bureau of Crime Statistics and Research (BoCSAR) reports that,

“Hotspot maps illustrate areas of high crime density relative to crime concentrations in NSW. The hotspots indicate areas with a high level of clustering of recorded criminal incidents for the selected offence...LGAs with crime hotspots do not necessarily have high count of incidents relative to other LGAs. This is because hotspots reflect the density of incidents in specific areas and not the number of incidents in the entire LGA. Hotspots are not adjusted for the number of people residing in or visiting the LGA and so do not necessarily reflect areas where people have a higher than average risk of victimisation.”¹²

Appendix B provides a review of NSW BOCSAR crime statistics (two year trend to March 2021 and rate per 100,000 population year to March 2021) and the most recent hotspot maps for the Werrington suburb, with the proposal site identified.

The two-year trend in Werrington suburb for offence types assessed has been **stable** (apart from Robbery, Theft – steal from dwelling, Theft - motor vehicle, Theft – break and enter non-dwelling, and Theft – steal from person which could not be calculated). Werrington suburb has a higher than NSW average rate of incidents for most offence types assessed including:

- Assault (Non-Domestic) (rate 2.6 times NSW average)
- Assault (Domestic) (rate 2.1 times NSW average)
- Malicious damage to property (rate 2.5 times NSW average)
- Robbery (rate 4.4 times NSW average)
- Theft -break and enter dwelling (rate 2.3 times NSW average)
- Theft – motor vehicle (rate 1.9 times NSW average)
- Theft – steal from motor vehicle (rate 2.6 times NSW average)
- Theft – break and enter non dwelling (rate 2.6 times NSW average)
- Theft – steal from person (rate 7.1 times NSW)

Werrington has lower than NSW average rates for Theft – Steal from Dwelling.

The proposed Boarding House is located in **high density** hotspots for offences including:

- Assault – non domestic
- Assault – domestic
- Malicious damage
- Theft – break and enter dwelling

¹² Burgess, M (2011) Understanding crime hotspot maps, NSW Bureau of Crime Statistics and Research, Crime and Justice Statistics, Bureau Brief, Issue paper no 60, April, Pg 3.

- Theft – steal from motor vehicle

It is located in a **moderate density** hotspot for:

- Theft – Steal from Dwelling
- Theft – Motor Vehicle

Details are shown in **Appendix B**.

This crime context has safety and security implications for future Boarding House residents and their vehicles parked on or off site in the local area.

5 CPTED Analysis

5.1 Introduction

The design has been reviewed with regard to the CPTED principles of surveillance, access control, territorial reinforcement and space management.¹³

5.2 Surveillance

Basement levels. There are generally good sight lines within the car park from the lift entrances, however there are concealment opportunities near spaces 33-36 and 1-9. Surveillance could be improved by provision of mirrors to see into this area. Given crime levels in the locality, provision of CCTV surveillance in the car park area is supported. Lighting details are not provided on the drawings, however permanent, rather than sensor activated, lighting would provide increased surveillance. Windows could be provided to doors to stairs, the front escape stairs and to the garbage room to improve surveillance for people entering these areas.

Ground floor. There appear to be good site lines from the front door to the street. Planting adjacent to the entrance pathway is low and will minimise opportunities for concealment. There are dead end corridors with low surveillance and opportunities for concealment near rooms at the rear of the building. Surveillance could be improved in this area by CCTV surveillance or by use of mirrors. Due to the likely high number of residents, provision of a staffed reception desk near the front entrance should be considered. Lighting details are not provided on the drawings, however permanent, rather than sensor activated, lighting would provide increased surveillance. The entrance to the common room is open, so that people entering the room can see who is in there.

There are four dead end corridors on each of levels one, two and three and these should be provided with CCTV surveillance or appropriate mirrors to improve surveillance, or reconfigured to improve sight lines.

There is generally good surveillance to outdoor areas with windows overlooking all set back areas. Side and rear set back areas are shown as private courtyards to ground floor rooms, with two areas shown as common outdoor space. Landscaping in these areas is appropriate, and provides for sightlines from entrances. Similarly, planting around the front entrance is low and so does not provide opportunities for concealment.

¹³ Department of Urban Affairs and Planning (2001) *Crime prevention and the assessment of development applications*

Permanent lighting should be provided to the front entrance area, and CCTV surveillance should be provided in this area.

5.3 Access Control

Secure fencing, with appropriate security gates should be provided to the front, sides and rear of the development. As a minimum, security access, such as card operated doors, is required to the front door, side doors and to the basement parking area.

5.4 Territorial Reinforcement

Territorial reinforcement is likely to be of particular concern in the foyer area. This will be improved by a manned concierge desk and by high levels of maintenance. The common living areas and private open space need to be inviting with good facilities to encourage usage. Territorial reinforcement will be facilitated by space management in common areas as discussed below. A low fence should be provided to the front of the development with an entrance gate to the front walkway.

5.5 Space Management/Maintenance

The operator will need a program in place to manage and maintain space.

6 Amenity

6.1 Boarding House Residents

6.1.1 Internal Amenity

The most recent plans show that all rooms exceed the minimum allowable size under clause 29 of SEPPARH. All rooms contain private bathroom, kitchen and laundry facilities. We are advised that fittings comprise cooktop, oven, refrigerator, dishwasher, clothes washer and clothes drier. All first, second and third floor rooms have one window. Ground floor rooms have a private courtyard with sliding glass door access.

A common living room of 38 m² is provided for at ground level on the north western corner of the building, adjacent to the common outdoor area on the north western corner of the site, with an adjacent toilet. Furnishings include a kitchenette, television, lounge seating for eight people and dining seating for three people.

While the common living room meets the requirements of the SEPP, the size is small relative to the number of lodging rooms. A single large room could be dominated by a few lodgers, and consideration should be given to provision of common rooms on each level.

6.1.2 External Amenity

A covered 39 m² common outdoor open space area is shown at the north western corner of the building adjacent to the common room and is accessible from the common living room. This area will contain lounge seating for five and table and chairs for six people.

Additional outdoor common space is provided in two areas at the rear of the building in the side setback area. These areas are scaled at 40 m² each, and contain clothes drying racks and landscaping. No seating or shelter is provided.

We are advised that the development will be fenced with 1.8 metre timber fencing.

6.2 Residents living in the locality

6.2.1 Parking

The development provides on-site parking in two basement levels accessed from Railway Street. The level of parking provided meets the requirements of SEPPARH. At the time of the site visit, there was on-street parking available in Railway Street, although this is likely to be affected by COVID19 restrictions, and the proximity of Werrington Railway Station would be expected to place demand on on street parking.

The Parking and Traffic Report concludes that there are no traffic or parking related issues that should prevent approval of the subject application.

6.2.2 Noise and privacy

There are privacy concerns related to the overlooking of windows, balconies and yards in dwellings to the east and rear of the proposed development by windows on the first, second and third levels of the proposed development. Details are shown in the figures below. Consideration could be given to provision of screens to these windows.

The location of the common areas is not adjacent to current developments and so usage is unlikely to result in adverse noise impacts.



Figure 6.1: Windows and balconies to adjoining property at 8 Railway Street

Source: JSA, 2021



Figure 6.2: Windows, balconies and yards to adjoining properties at the rear of the proposed development

Source: JSA, 2021

JSA has not sighted an Acoustic Report for this proposal and would defer to an expert's view with regard to these issues.

6.3 Survey of neighbours & local residents

Due to COVID19 restrictions, JSA carried out a letter box drop to households in proximity to the proposed boarding house on 6 September 2021. Sixty-six dwellings in Railway Street, Rance Road and Walker Street were letterboxed. These households would be most likely to experience any adverse amenity impacts from the proposed Boarding House.

Households were provided with basic information about the proposal, and were invited to contact us to conduct a survey or to email a completed survey by 5 pm 9 September 2021.

One response was received, suggesting a low level of community concern regarding the proposed development.¹⁴

The person surveyed was particularly concerned about the size of the boarding house and the difficulty in managing. Particular concerns related to the welfare and safety of women and children in the Boarding House and concerns regarding other vulnerable people. Proposed mitigations were to reduce the scale of the boarding house and to ensure management had skills in supporting people, particularly in areas such as drugs and alcohol.

¹⁴ Similar approaches in other communities surveyed by JSA have led to very high levels of response.

7 Appendix A: Demographic Profile of Locality

To gain an understanding of the context of the proposed boarding house site, a demographic profile has been provided for SA1 1146219 (the smallest Census area containing the proposal site with a population of 664 people in 2016) in comparison with demographics for Werrington State Suburb, Penrith City LGA and Greater Sydney. This information has been separated into selected person characteristics, education, employment and income and dwelling characteristics using data for place of usual residence.

Statistical Area Level 1, 1146219

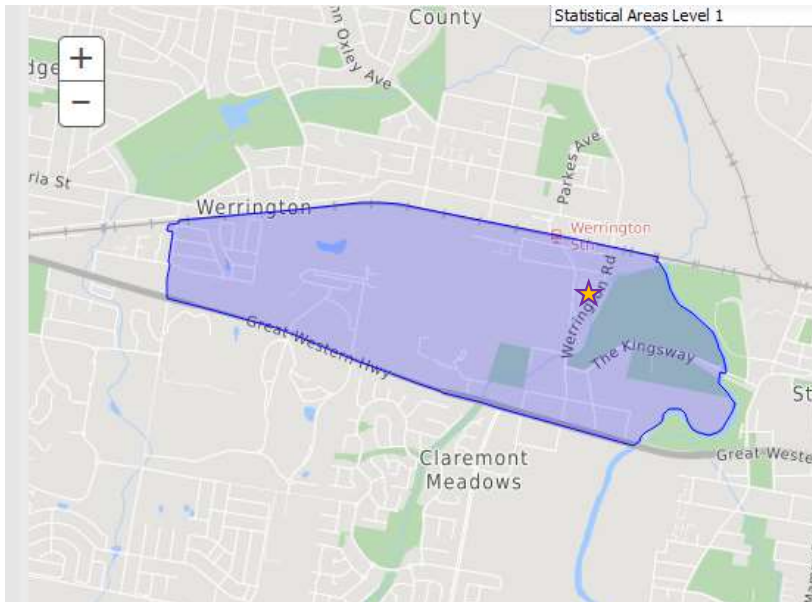


Figure A-1: Statistical Area Level 1, 1146219 with 10-11 Railway St Werrington indicated with star

Source: www.abs.gov.au

Werrington State Suburb

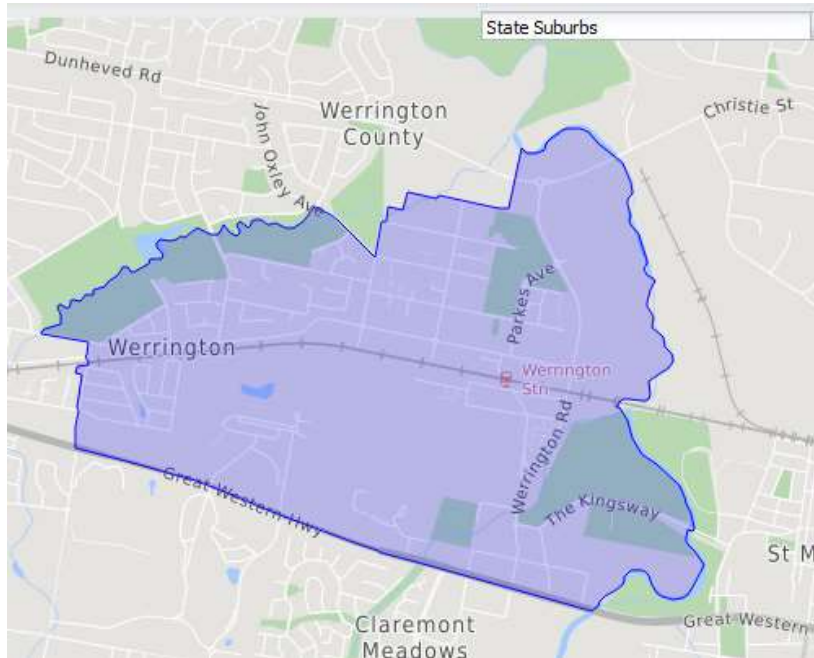


Figure A-2: Werrington State Suburb

Source: www.abs.gov.au

Penrith LGA

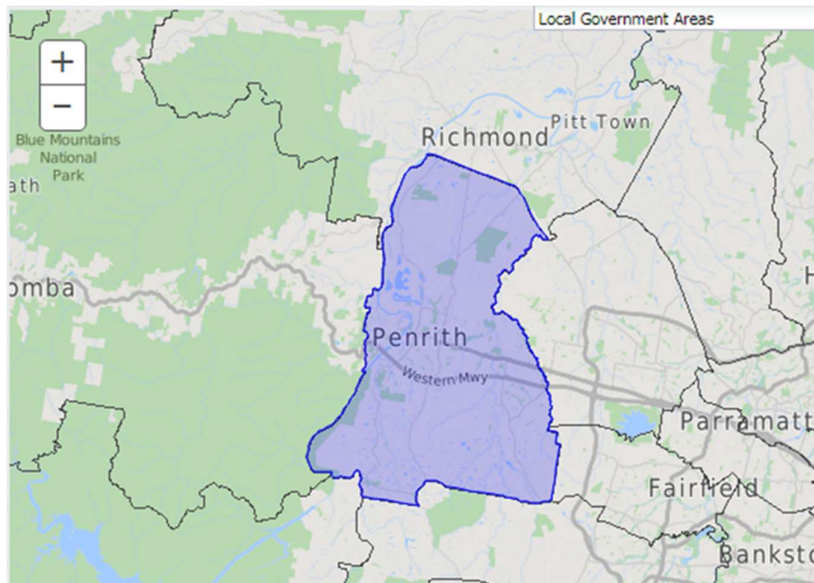


Figure A-3: Penrith Local Government Area

Source: www.abs.gov.au

Greater Sydney

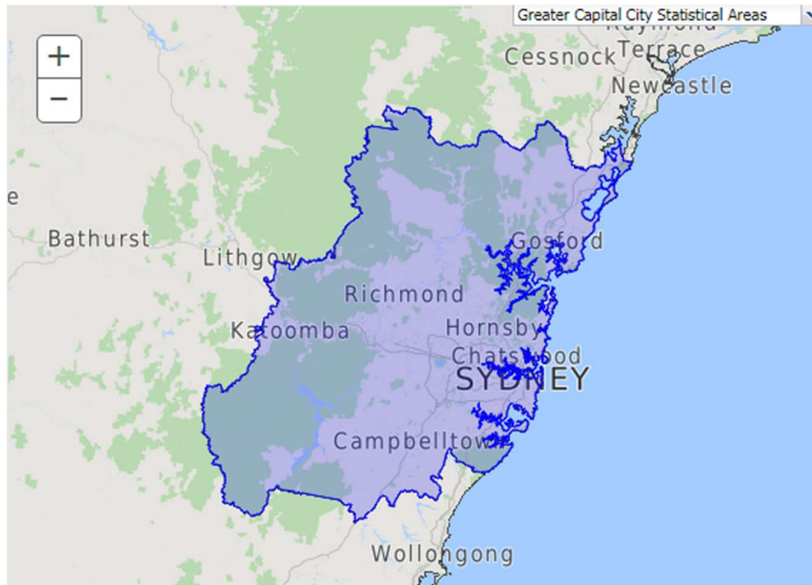


Figure A-4: Greater Sydney – Greater Capital City Statistical Area

Source: www.abs.gov.au

Overview

The SA1 where the proposed boarding house is located is characterised as a disadvantaged area compared to both the Penrith LGA average and to Greater Sydney.

The SA1 area around the proposal site ranks among the bottom 20% of SA1's in NSW across each of the four SEIFA indices. However, the SA1 has lower levels of disadvantage than the Werrington suburb in the areas of Economic Resources and Education and Occupation. The Werrington suburb is among the most disadvantaged 10% of suburbs in NSW for index of relative socio-economic disadvantage, advantage and disadvantage, education and occupation and economic resources.

The SA1 of the proposal site, 1146219, has a greater proportion of females and younger age structure compared to Werrington suburb, Penrith LGA and Greater Sydney; as does Werrington suburb compared to Penrith LGA and Greater Sydney. The SA1, Werrington suburb and Penrith LGA have higher proportions of residents from an Indigenous background compared to Greater Sydney, between 4-5% of these populations compared to 1.5%. Werrington suburb has a higher proportion of those in need of assistance with a core daily activity at 6.2% of residents compared to the SA1 (5.3%), Penrith LGA (5.5%) and Greater Sydney (5.2%).

The SA1, Werrington Suburb and Penrith LGA are characterised by high proportions of those born in Australia (67%, 70% and 72% respectively) compared with Greater Sydney (57%). Predominate countries of birth amongst SA1 resident population include Philippines, India, New Zealand and Nepal which is a similar profile to the suburb and LGA.

The SA1 has similar levels of post-schooling qualifications to Werrington suburb and Penrith LGA, which are below Greater Sydney. Between 9-11% of residents hold a Bachelor's Degree in the SA1, suburb or LGA compared to 22% for the Greater Sydney average; correspondingly larger proportions of residents in these areas hold Certificate Level qualifications than average.

School completion rates are lower in the SA1 compared to Greater Sydney but higher than the suburb and LGA, with 55% of residents completing Year 12 in the SA1 compared with 65% for Greater Sydney.

The SA1 has a similar proportion of those not in the labour force at 32% compared to the Werrington suburb (33%), Penrith LGA (31%) and Greater Sydney (34%). As at the 2016 Census, the unemployment rate in the SA1 and Werrington suburb was 9.0%, greater than the LGA at 5.7% and Greater Sydney at 6%.

The main industries of employment in the SA1 are health care and social assistance, retail trade, public administration and safety and transport, postal and warehousing. The main industries in Werrington suburb are health care and social assistance, retail trade, construction and manufacturing.

Personal income levels are higher in the SA1 than the Werrington suburb, but below the Penrith LGA and Greater Sydney. Household income levels in the SA1 are below the Werrington suburb, and further below the Penrith LGA and Greater Sydney averages.

The SA1 is characterised by high levels of semi detached etc housing (62%) compared to all benchmarks and high levels of flats etc (23%) compared to the LGA, showing a high density area. Werrington suburb has higher densities than Greater Sydney, with fewer dwellings as separate houses. Penrith LGA is very low density compared to all areas, with 80% of dwellings as separate houses.

The SA1 and suburb have lower levels of ownership (52%) compared to the LGA (68%) and Greater Sydney (64%). Social rental is particularly high in the SA1 (15%) and in the suburb (11%) compared to the LGA and Greater Sydney (5%).

The SA1 and suburb have a lower level of car ownership (87% and 89%) compared to the LGA (94%) but similar to Greater Sydney.

Socio-Economic Indexes for Australia (SEIFA)

The table below shows the scores and decile rankings for areas in NSW and Australia for the SA1 and Werrington suburb for the four SEIFA indexes.

The SA1 area around the proposal site ranks among the bottom 20% of SA1's in NSW across each of the four SEIFA indices. However, the SA1 has lower levels of disadvantage than the Werrington suburb in the areas of Economic Resources and Education and Occupation. The Werrington suburb is among the most disadvantaged 10% of suburbs in NSW for index of relative socio-economic disadvantage, advantage and disadvantage, education and occupation and economic resources.

Table A.1: SEIFA Scores and Percentile Rankings for SA1 1146219 and Werrington Suburb

	SA1 1146219	Werrington Suburb
Index of Relative Socio Economic Disadvantage		
Score	890	921
Percentile ranking within NSW	14	13
Index of Relative Socio Economic Advantage and Disadvantage		
Score	884	909
Percentile ranking within NSW	13	12
Index of Economic Resources		
Score	866	908
Percentile ranking within NSW	10	6
Index of Education and Occupation		
Score	916	911
Percentile ranking within NSW	21	12

Source: ABS (2016) SEIFA

Person Characteristics

The SA1 of the proposal site, 1146219, has a greater proportion of females and younger age structure compared to Werrington suburb, Penrith LGA and Greater Sydney; as does Werrington suburb compared to Penrith LGA and Greater Sydney. The SA1, Werrington suburb and Penrith LGA have higher proportions of residents from an Indigenous background compared to Greater Sydney, between 4-5% of these populations compared to 1.5%. Werrington suburb has a higher proportion of those in need of assistance with a core daily activity at 6.2% of residents compared to the SA1 (5.3%), Penrith LGA (5.5%) and Greater Sydney (5.2%).

Table A-2: Selected person characteristics of residents of SA1 1146219, Werrington Suburb and Penrith LGA compared with Greater Sydney

	SA1 1146219	Werrington State Suburb	Penrith LGA	Greater Sydney
Sex				
Male	45.8%	48.9%	49.4%	49.3%
Female	54.2%	51.1%	50.6%	50.7%
Age				
0-9	19.9%	15.3%	14.6%	12.8%

	SA1 1146219	Werrington State Suburb	Penrith LGA	Greater Sydney
10-19	10.1%	11.1%	13.1%	11.8%
20-29	19.6%	16.7%	14.9%	15.0%
30-39	17.4%	17.7%	14.9%	15.5%
40-49	13.7%	13.0%	13.3%	13.7%
50-59	8.1%	10.4%	12.3%	12.2%
60-69	7.1%	9.8%	9.7%	9.5%
70-79	3.5%	4.3%	4.8%	5.7%
80-89	0.7%	1.6%	2.0%	3.0%
90+	0.0%	0.1%	0.4%	0.7%
Indigenous Profile (INGP)	4.7%	5.2%	4.2%	1.5%
Needs Assistance with Core Daily Activities	5.3%	6.2%	5.5%	5.2%

Source: JSA, calculations 2021, based on data from ABS Census of Population and Housing 2016, Place of Usual Residence.

Country of birth

The SA1, Werrington Suburb and Penrith LGA are characterised by high proportions of those born in Australia (67%, 70% and 72% respectively) compared with Greater Sydney (57%). Predominate countries of birth amongst SA1 resident population include Philippines, India, New Zealand and Nepal which is a similar profile to the suburb and LGA.

Table A-3: Top 5 country of birth responses for residents of SA1 1146219, Werrington State Suburb and Penrith LGA compared with Greater Sydney

	SA1 1146219	Werrington State Suburb	Penrith LGA	Greater Sydney
1	Australia (67%)	Australia (70%)	Australia (72%)	Australia (57%)
2	Philippines (7%)	Philippines (5%)	England (3%)	China (excludes SARs and Taiwan) (5%)
3	India (5%)	India (4%)	New Zealand (2%)	England (3%)
4	New Zealand (3%)	New Zealand (3%)	Philippines (2%)	India (3%)
5	Nepal (2%)	England (3%)	India (2%)	New Zealand (2%)

Source: JSA, calculations 2021, based on data from ABS Census of Population and Housing 2016, Place of Usual Residence.

Education

The SA1 has similar levels of post-schooling qualifications to Werrington suburb and Penrith LGA, which are below Greater Sydney. Between 9-11% of residents hold a Bachelor's Degree in the SA1, suburb or LGA compared to 22% for the Greater Sydney average; correspondingly larger proportions of residents in these areas hold Certificate Level qualifications than average.

Table A-4: Secondary and Tertiary education completed by residents of SA1 1146219, Werrington State Suburb and Penrith LGA compared with Greater Sydney

Indicator	SA1 1146219	Werrington State Suburb	Penrith LGA	Greater Sydney
Post-Schooling Qualification (All people)				
Post-Graduate	2%	4%	3%	8%
Grad. Dip/Grad Cert.	1%	1%	1%	2%
Bachelor Degree	10%	9%	11%	22%
Adv. Dip/Dip Level	7%	7%	10%	11%
Cert. Level (I, II, III & IV)	16%	15%	23%	14%

Source: JSA, calculations 2021, based on data from ABS Census of Population and Housing 2016, Place of Usual Residence.

School completion rates are lower in the SA1 compared to Greater Sydney but higher than the suburb and LGA, with 55% of residents completing Year 12 in the SA1 compared with 65% for Greater Sydney.

Table A-5: Highest year of secondary education (people aged 15+) for SA1 1146219, Werrington State Suburb and Penrith LGA compared with Greater Sydney

Indicator	SA1 1146219	Werrington State Suburb	Penrith LGA	Greater Sydney
Highest Year of Secondary Education (people aged 15+)				
Year 12	55%	49%	47%	65%
Year 11	7%	7%	8%	5%
Year 10	28%	29%	32%	18%
Year 9	6%	8%	8%	5%
Year 8 or below	3%	5%	5%	4%
Did not go to school	1%	1%	1%	1%

Source: JSA, calculations 2021, based on data from ABS Census of Population and Housing 2016, Place of Usual Residence.

Employment & Income

The SA1 has a similar proportion of those not in the labour force at 32% compared to the Werrington suburb (33%), Penrith LGA (31%) and Greater Sydney (34%). As at the 2016 Census, the unemployment rate in the SA1 and Werrington suburb was 9.0%, greater than the LGA at 5.7% and Greater Sydney at 6%.

The main industries of employment in the SA1 are health care and social assistance, retail trade, public administration and safety and transport, postal and warehousing. The main industries in Werrington suburb are health care and social assistance, retail trade, construction and manufacturing.

Personal income levels are higher in the SA1 than the Werrington suburb, but below the Penrith LGA and Greater Sydney. Household income levels in the SA1 are below the Werrington suburb, and further below the Penrith LGA and Greater Sydney averages.

Table A-6: Employment and Income demographics of SA1 1146219, Werrington State Suburb and Penrith LGA compared with Greater Sydney

Indicator	SA1 1146219	Werrington State Suburb	Penrith LGA	Greater Sydney
Labour Force Status				
Employed	62.8%	60.5%	65.0%	61.7%
Not in the Labour Force	31.8%	33.1%	31.1%	34.4%
Unemployment rate	9.0%	9.0%	5.7%	6.0%
Top Industries of Employment				
-	Health Care & Social Assistance (17%)	Health Care & Social Assistance (14%)	Construction (12%)	Health Care & Social Assistance (12%)
-	Retail Trade (12%)	Retail Trade (12%)	Health Care & Social Assistance (12%)	Professional, Scientific & Technical Services (10%)
-	Public Administration and Safety (9%)	Construction (9%)	Retail Trade (11%)	Retail Trade (10%)
-	Transport, Postal and Warehousing (9%)	Manufacturing (8%)	Manufacturing (8%)	Construction (10%)
Median Weekly Income (2016 \$)				
Personal	\$672	\$643	\$728	\$719
Household	\$1,178	\$1,228	\$1,656	\$1,747

Source: JSA, calculations 2021, based on data from ABS Census of Population and Housing 2016, Place of Usual Residence.

Dwelling Characteristics

The SA1 is characterised by high levels of semi detached etc housing (62%) compared to all benchmarks and high levels of flats etc (23%) compared to the LGA, showing a high density area. Werrington suburb has higher densities than Greater Sydney, with fewer dwellings as separate houses. Penrith LGA is very low density compared to all areas, with 80% of dwellings as separate houses.

The SA1 and suburb have lower levels of ownership (52%) compared to the LGA (68%) and Greater Sydney (64%). Social rental is particularly high in the SA1 (15%) and in the suburb (11%) compared to the LGA and Greater Sydney (5%).

The SA1 and suburb have a lower level of car ownership (87% and 89%) compared to the LGA (94%) but similar to Greater Sydney.

Table A-7: Dwelling characteristics in SA1 1146219, Werrington State Suburb and Penrith LGA compared with Greater Sydney

Indicator	SA1 1146219	Werrington suburb	Penrith LGA	Greater Sydney
Dwelling Structure				
Separate House	14.7%	41.9%	80.3%	55.3%
Semi-detached, row or terrace house, town house etc	61.9%	30.8%	12.3%	14.0%
Flat, unit or apartment	23.4%	27.0%	6.9%	30.0%
Other dwelling type (caravan, cabin, houseboat, improvised, house or flat attached to shop, office, etc)	0.0%	0.2%	0.5%	0.7%
Tenure & Landlord Type				
Owned outright/with mortgage	51.8%	52.1%	68.4%	63.9%
Rented (private)	33.4%	38.6%	25.9%	29.8%
Rented (public)	12.4%	7.6%	4.2%	4.3%
Rented (community)	2.5%	1.6%	0.6%	0.7%
Number of motor vehicles per dwelling				
None	12.9%	11.3%	6.3%	11.6%
One	57.4%	49.7%	32.1%	38.5%
Two	21.9%	28.1%	38.4%	33.8%
Three	5.1%	6.3%	14.1%	10.5%
Four or more	2.7%	4.6%	9.1%	5.7%

Source: JSA, calculations 2021, based on data from ABS Census of Population and Housing 2016, Place of Usual Residence.

Appendix B: NSW BoCSAR Crime Data & Maps

The Table below shows the two year trend to March 2021 and the incident rate (per 100,000 population) for the Year to March 2021, for the **Werrington suburb** compared to NSW for a range of offence types. Crime hotspot maps for a range of offences for the Werrington suburb for the period April 2020 to March 2021 (the most recent period available at the time of writing) follow.

Table B-8: NSW BoCSAR Incident Rates Werrington State Suburb & Proposal Site within Hotspot

Offence Type	Area	2 Year Trend to March 2021	Rate (per 100,000 population) Year to March 2021	10-11 Railway St w/in Hotspot?
Assault – Non Domestic	Werrington Suburb	Stable	942	Yes – high density
	NSW	Stable	361	
Assault - Domestic	Werrington Suburb	Stable	856.3	Yes – high density
	NSW	Up 1.1% per year	394.9	
Malicious Damage	Werrington Suburb	Stable	1648.5	Yes – high density
	NSW	Stable	650.1	
Robbery	Werrington Suburb	n.c. ¹⁵	107	No
	NSW	Down 20.4%	24.3	
Theft- steal from Dwelling	Werrington Suburb	n.c.	192.7	Yes – medium density
	NSW	Down 13.8%	201.0	
Theft – Break and Enter dwelling	Werrington Suburb	Stable	535.2	Yes – high density
	NSW	Down 27.1%	227.7	
Theft - motor vehicle	Werrington Suburb	n.c.	256.9	Yes – medium density
	NSW	Down 16.3%	138.4	
Theft – steal from motor vehicle	Werrington Suburb	Stable	856.3	Yes – high density
	NSW	Down 29.1%	330.3	
Theft - break & enter non-dwelling	Werrington Suburb	n.c.	214.1	No
	NSW	Down 32.6%	82.9	
Theft - steal from person	Werrington Suburb	n.c.	170.2	No
	NSW	Down 45.2% per year	23.9	

Source: NSW BoCSAR, NSW Crime Tool, <http://crimetool.bocsar.nsw.gov.au/bocsar/>, accessed on 07/09/2021.

¹⁵ not calculable

NSW BoCSAR Crime Hotspot Maps

Assault Domestic

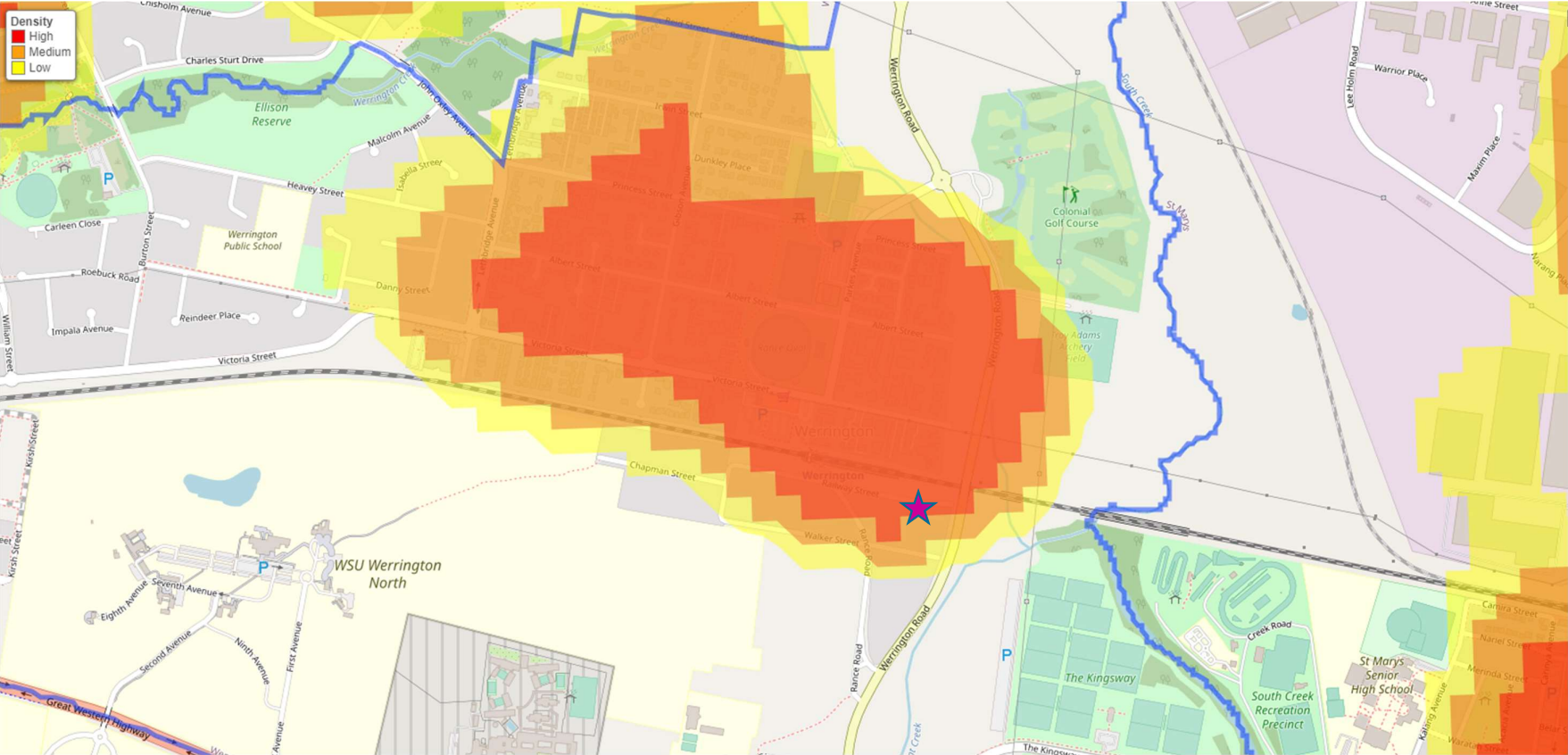


Figure B-5: Incidents of Assault (Domestic assault) from April 2020 to March 2021, Werrington suburb boundary & proposal site identified

Source: NSW BoCSAR, NSW Crime Tool, <http://crimetool.bocsar.nsw.gov.au/bocsar/>, accessed on 07/09/2021.

Assault Non-Domestic

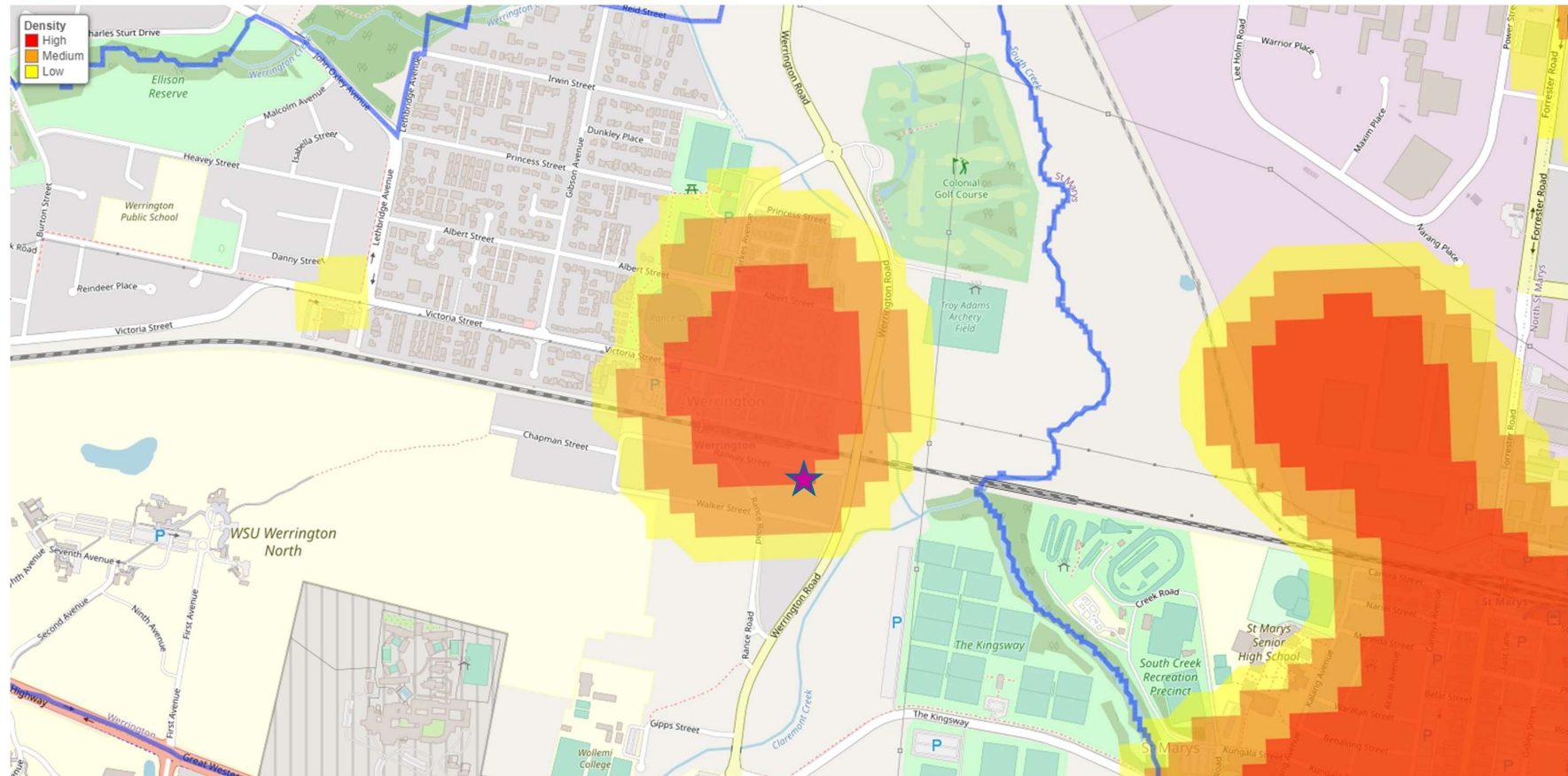


Figure B-6: Incidents of Assault (Non-domestic assault) from April 2020 to March 2021, Werrington suburb boundary & proposal site identified

Source: NSW BoCSAR, NSW Crime Tool, <http://crimetool.bocsar.nsw.gov.au/bocsar/>, accessed on 07/09/2021.

Robbery

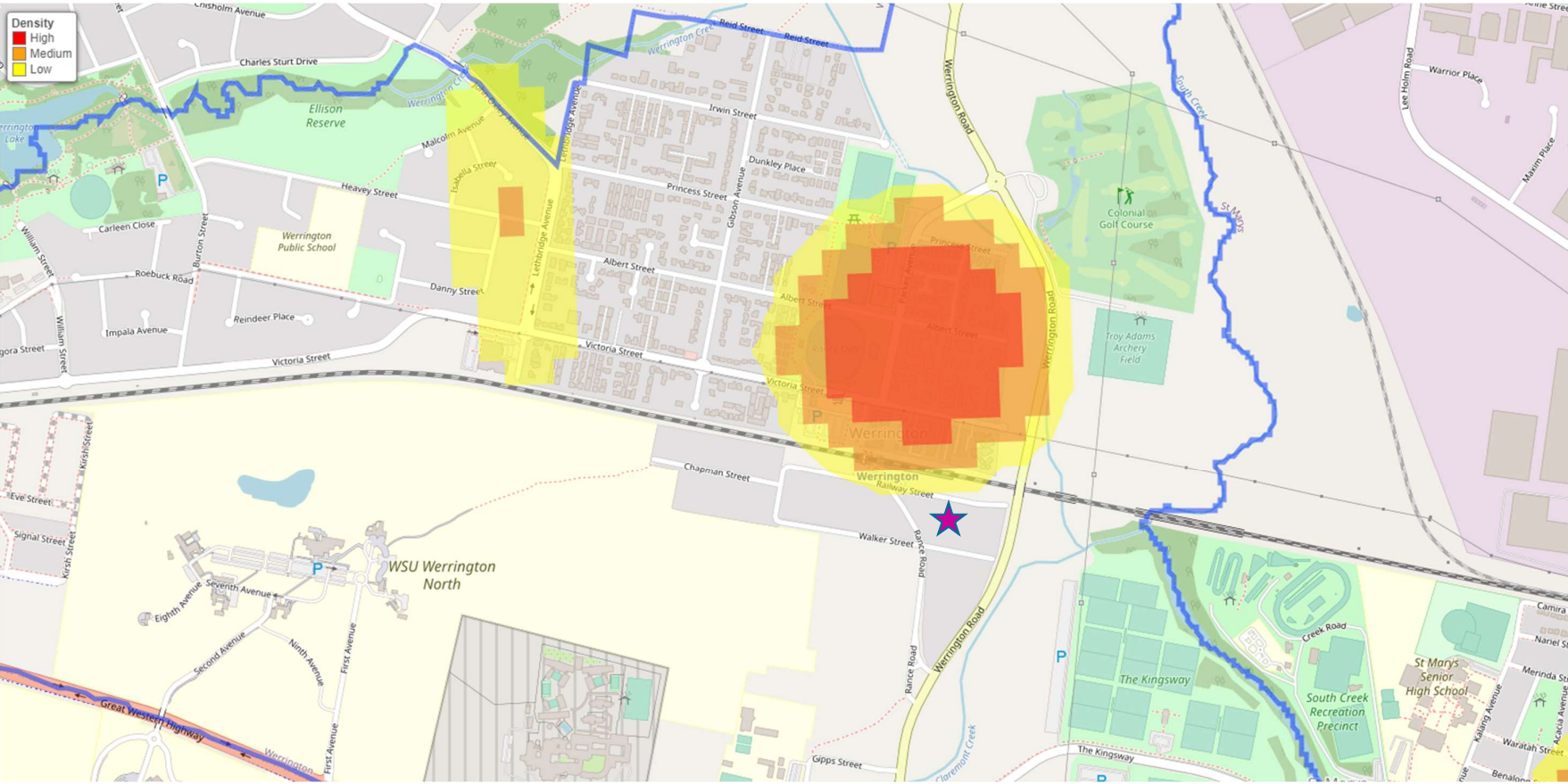


Figure B-7: Incidents of Robbery from April 2020 to March 2021, Werrington suburb boundary & proposal site identified
 Source: NSW BoCSAR, NSW Crime Tool, <http://crimetool.bocsar.nsw.gov.au/bocsar/>, accessed on 07/09/2021.

Theft - Break and Enter Dwelling

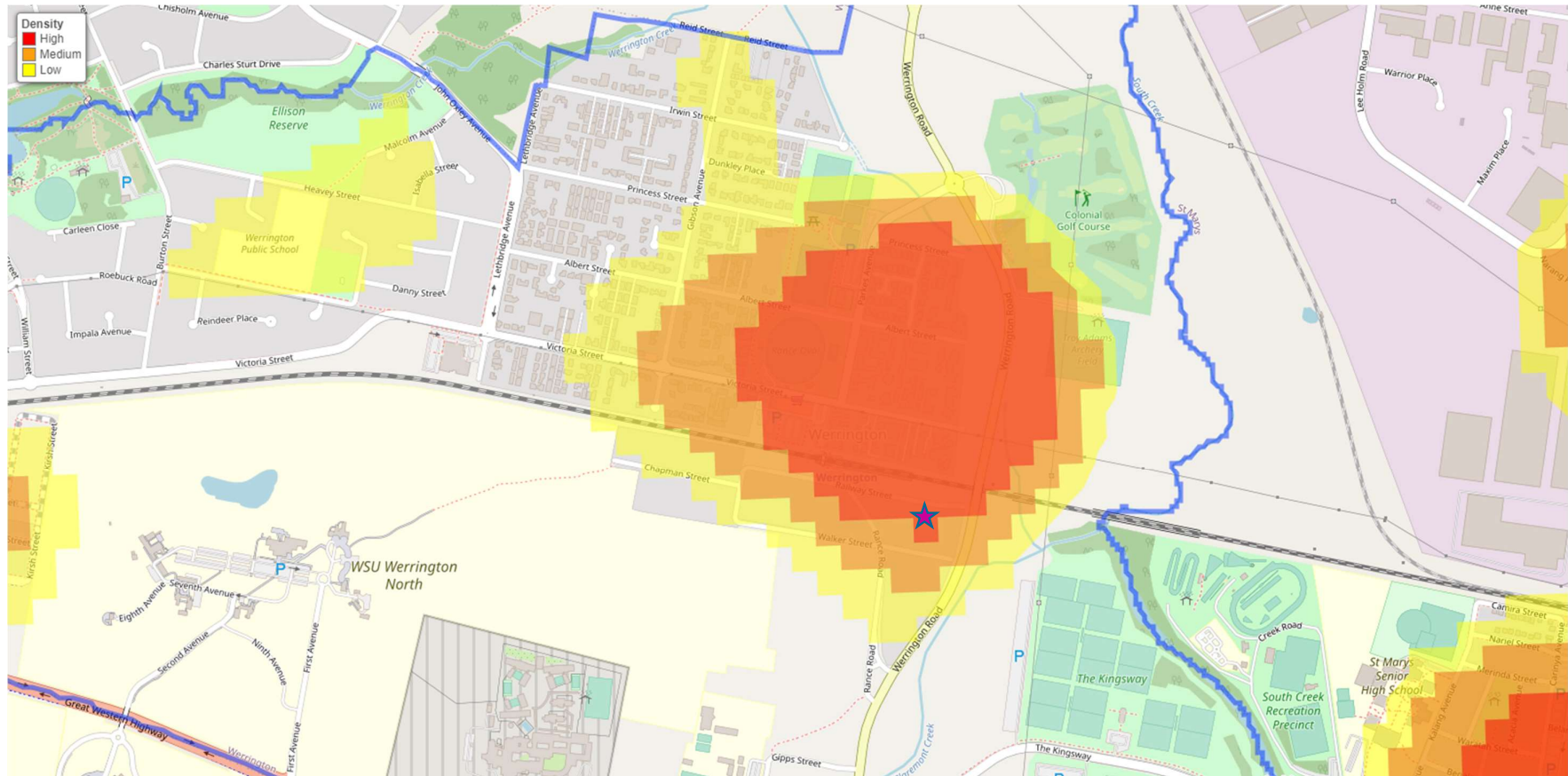


Figure B-8: Incidents of Theft (Break & enter dwelling) from April 2020 to March 2021, Werrington suburb boundary & proposal site identified

Source: NSW BoCSAR, NSW Crime Tool, <http://crimetool.bocsar.nsw.gov.au/bocsar/>, accessed on 07/09/2021.

Theft – Break and Enter Non-Dwelling

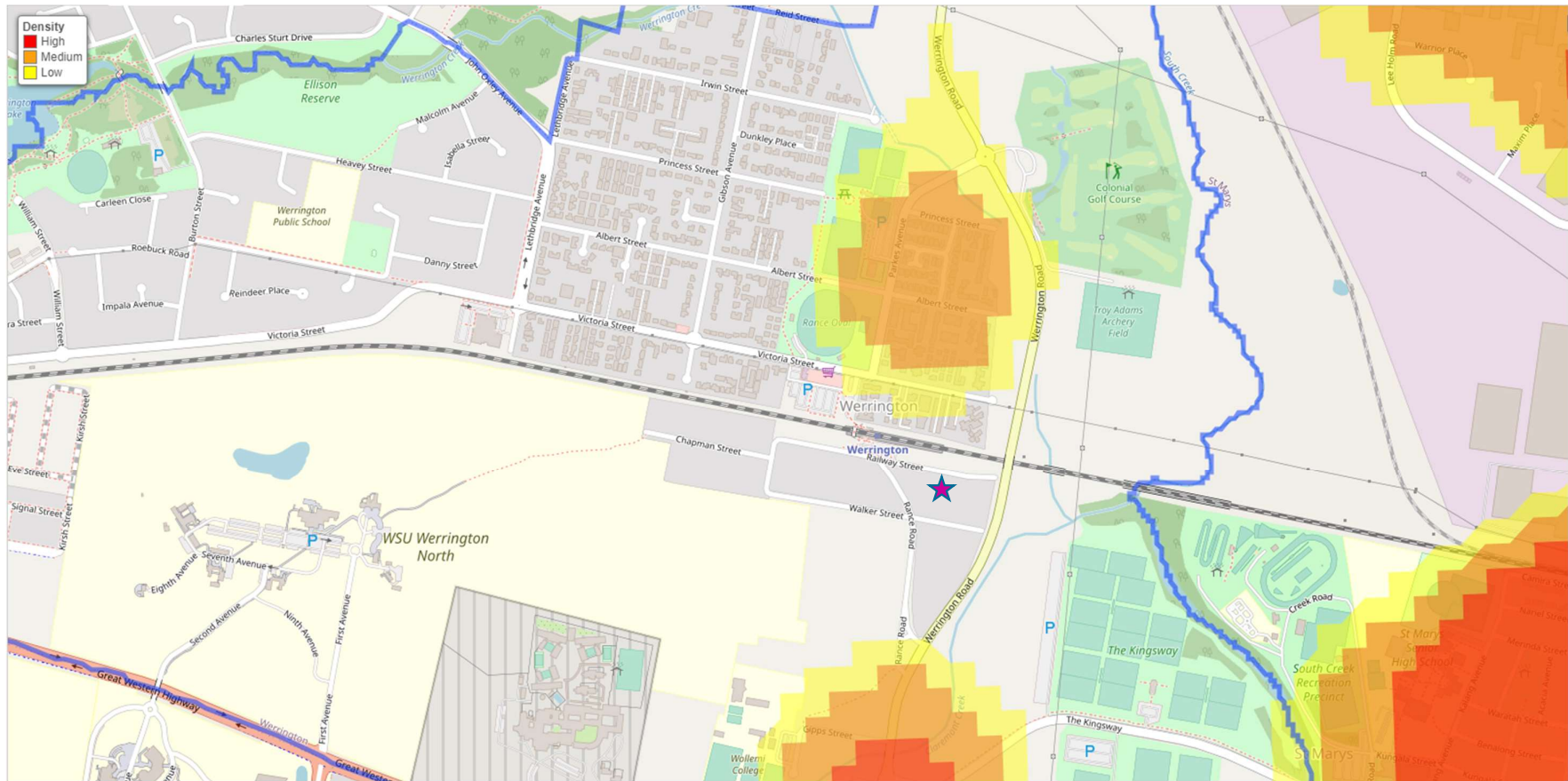


Figure B-9: Incidents of Theft (Break & enter non-dwelling) from April 2020 to March 2021, Werrington suburb boundary & proposal site identified

Source: NSW BoCSAR, NSW Crime Tool, <http://crimetool.bocsar.nsw.gov.au/bocsar/>, accessed on 07/09/2021.

Theft – Motor Vehicle theft

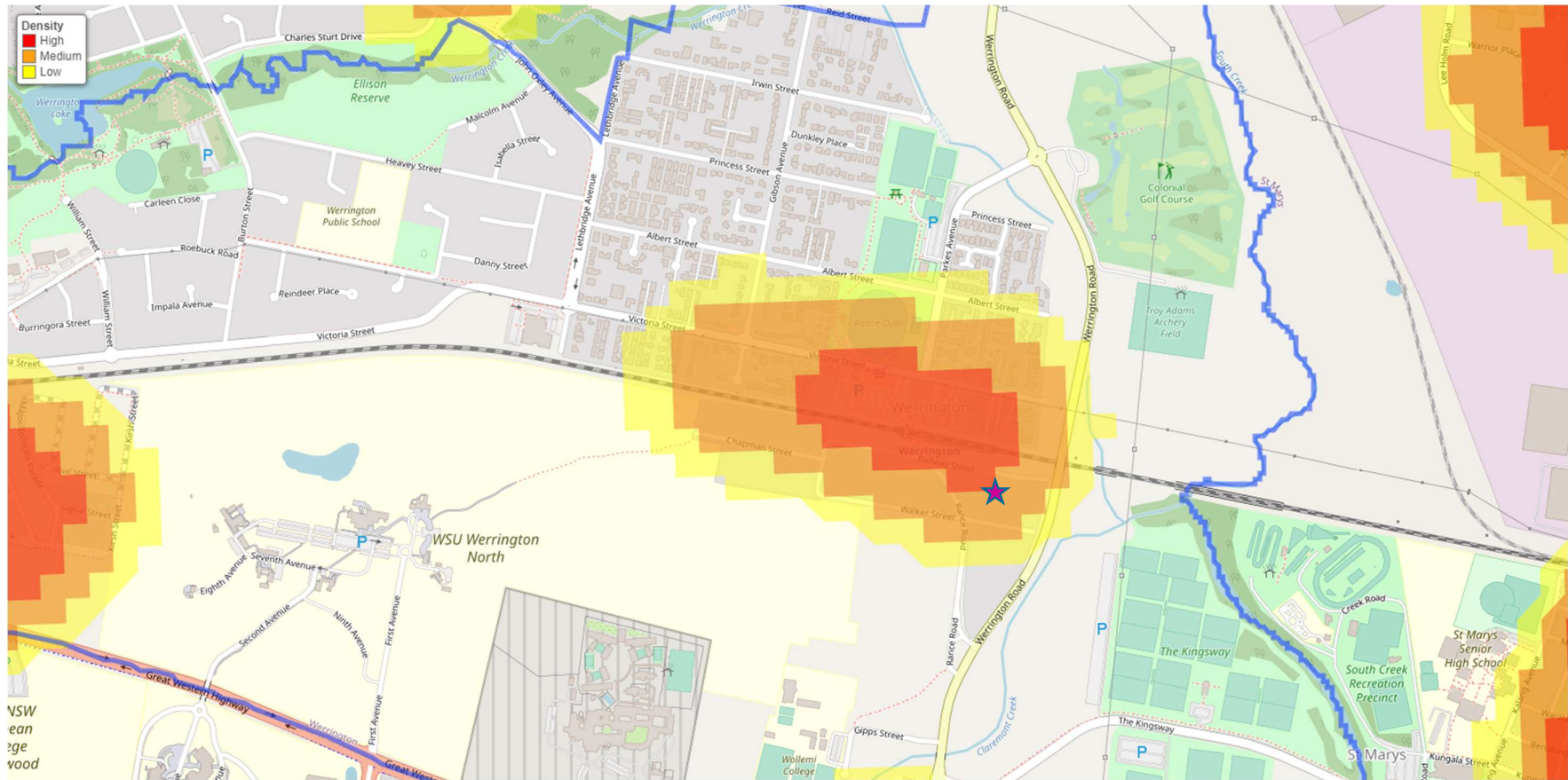


Figure B-10: Incidents of Theft (Motor vehicle theft) from April 2020 to March 2021, Werrington suburb boundary & proposal site identified

Source: NSW BoCSAR, NSW Crime Tool, <http://crimetool.bocsar.nsw.gov.au/bocsar/>, accessed on 07/09/2021.

Theft – Steal from Motor Vehicle

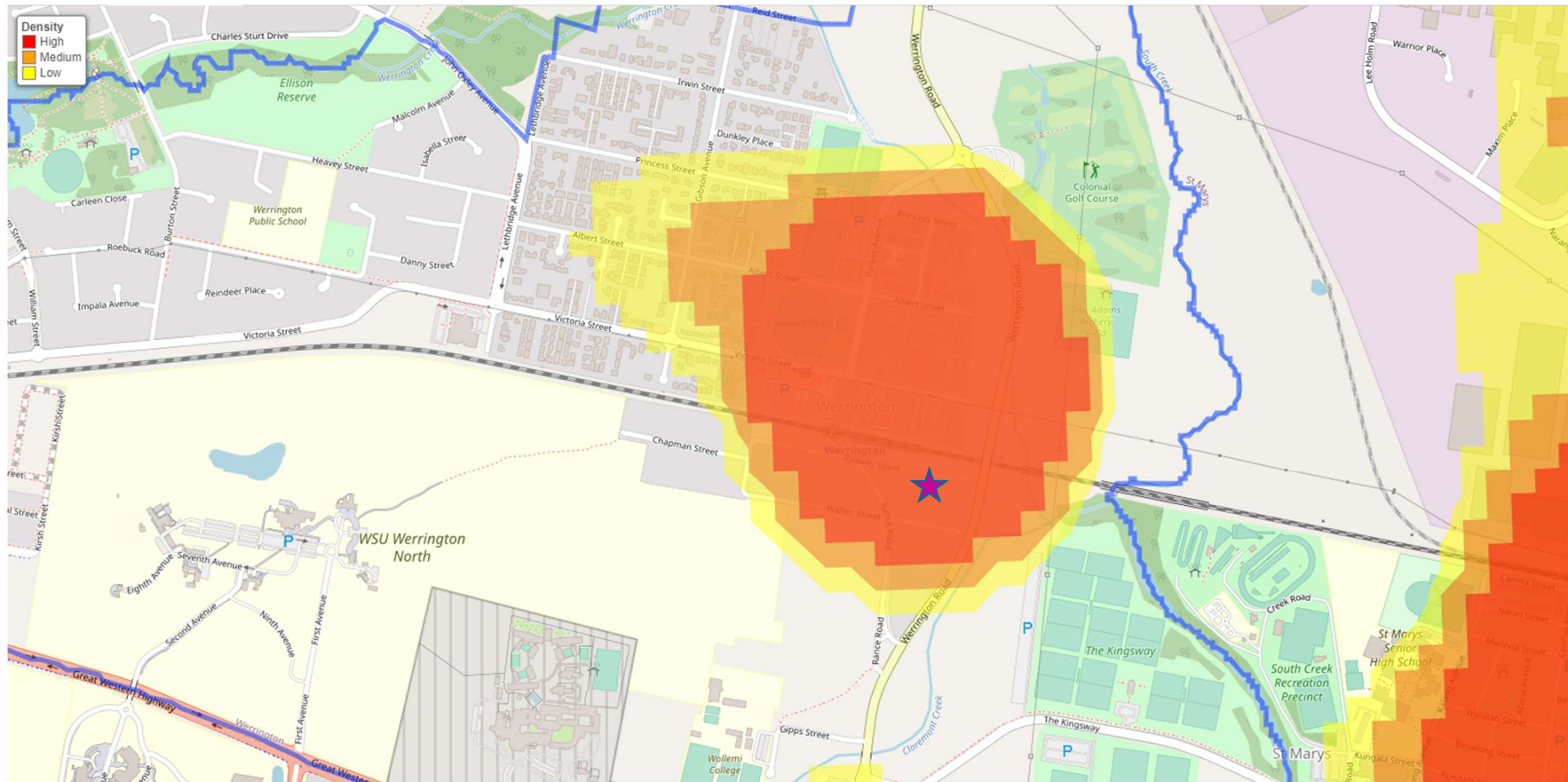


Figure B-11: Incidents of Theft (Steal from motor vehicle) from April 2020 to March 2021, Werrington suburb boundary & proposal site identified

Source: NSW BoCSAR, NSW Crime Tool, <http://crimetool.bocsar.nsw.gov.au/bocsar/>, accessed on 07/09/2021.

Theft – Steal from Dwelling

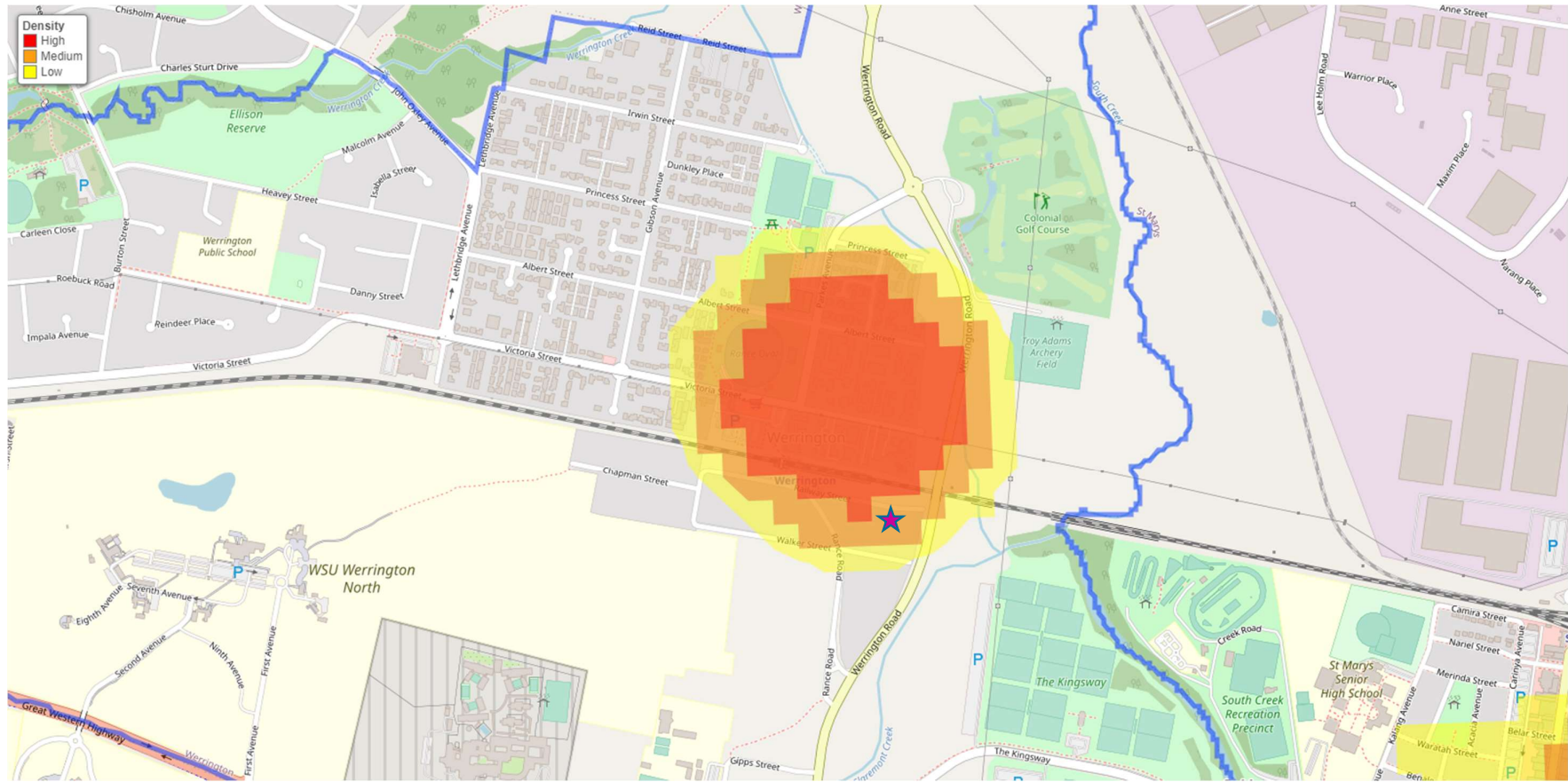


Figure B-12: Incidents of Theft (Steal from dwelling) from April 2020 to March 2021, Werrington suburb boundary & proposal site identified

Source: NSW BoCSAR, NSW Crime Tool, <http://crimetool.bocsar.nsw.gov.au/bocsar/>, accessed on 07/09/2021.

Theft – Steal from Person



Figure B-13: Incidents of Theft (Steal from person) from April 2020 to March 2021, Werrington suburb boundary & proposal site identified

Source: NSW BoCSAR, NSW Crime Tool, <http://crimetool.bocsar.nsw.gov.au/bocsar/>, accessed on 07/09/2021.

Malicious Damage to Property

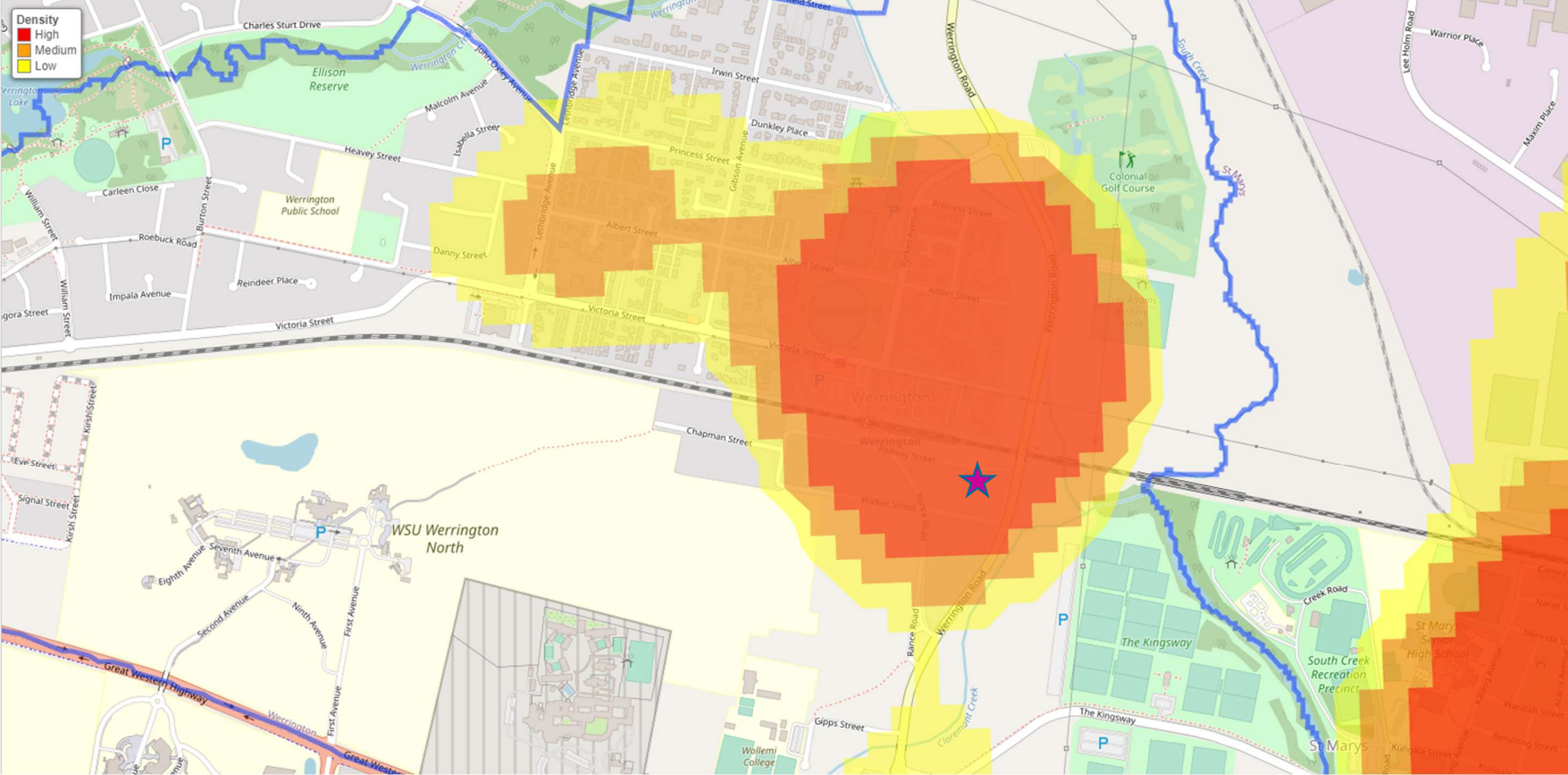


Figure B-14: Incidents of Malicious Damage to Property from April 2020 to March 2021, Werrington suburb boundary & proposal site identified
 Source: NSW BoCSAR, NSW Crime Tool, <http://crimetool.bocsar.nsw.gov.au/bocsar/>, accessed on 07/09/2021

