



CUMBERLAND
CITY COUNCIL

Cumberland Affordable Housing Strategy

2020

Acknowledgement of Country

Cumberland City Council acknowledges the Darug Nation and People as Traditional Custodians of the land on which Cumberland City is situated and pays respect to Aboriginal Elders both past, present and future.

We acknowledge Aboriginal and Torres Strait Islander Peoples as the First Peoples of Australia.

Cumberland City Council acknowledges other Aboriginal and Torres Strait Islander Peoples living in the Cumberland Local Government Area and reaffirms that we will work closely with all Aboriginal and Torres Strait Islander communities to advance reconciliation within the area.

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Section 1: Introduction

The Cumberland City Affordable Housing Strategy defines affordable housing and identifies the many different forms which it can take. It provides an analysis of local demand, as well as affordable housing that has been delivered to date within Cumberland City. This strategy also provides an overview of the current policy context, and identifies key priorities and actions which Council can pursue to continue to facilitate the delivery of affordable housing over the next 20 years.

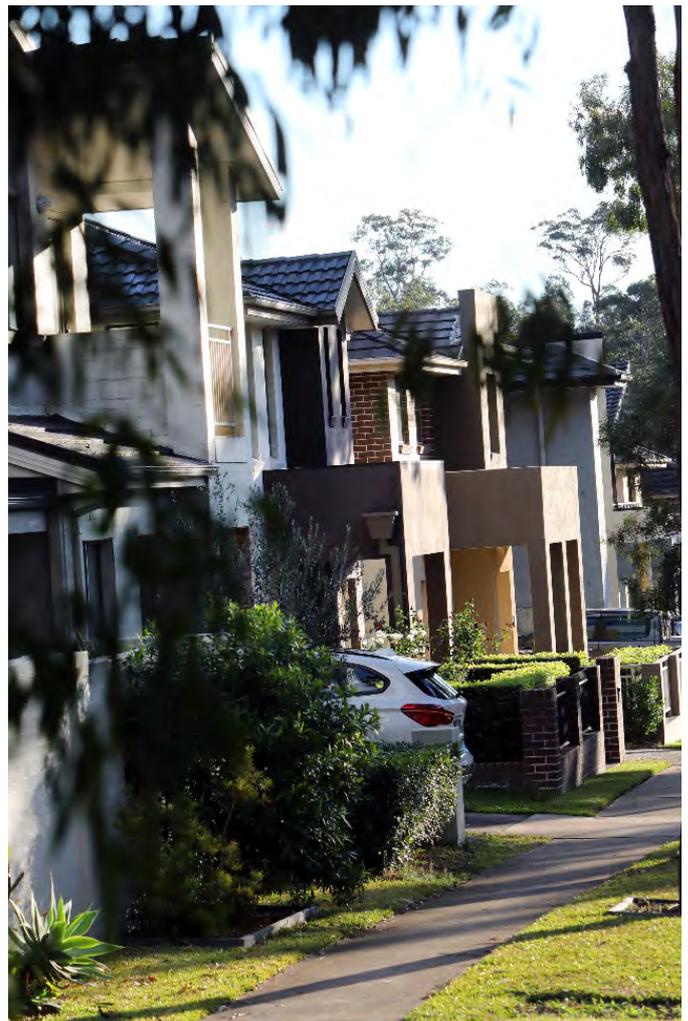
Affordable housing encompasses a broad spectrum of housing, providers, tenure and delivery models. Housing is generally considered affordable when households renting or purchasing are able to meet their housing costs and still have sufficient income to pay for other basic needs such as food, clothing, medical care, education and transport. Affordable housing generally refers to rental housing that is subsidised in some way, and also includes housing delivered through the private market, including secondary dwellings.

The *NSW Environmental Planning and Assessment Act 1979* defines affordable housing as housing for very low, low or moderate incomes households. State Environmental Planning Policy (SEPP) 70 defines very low income households as those on less than 50% of median household income for Greater Sydney; 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.

Households paying more than 30% of their gross household income on housing costs are considered to be in housing stress, and households paying more than 50% are considered to be in severe housing stress.

Housing in Greater Sydney is becoming increasingly unaffordable for more people, as the population continues to grow, and as housing prices and rental costs increase at a faster rate than household incomes. Affordable housing is essential for social equity and sustainability. Lack of affordably priced housing affects the quality of life of families and individuals, as well as having a significant impact on economic development and employment growth. Australian housing prices have doubled over the past 20 years, with Sydney and Melbourne's mean residential property prices second to only Hong Kong and Vancouver worldwide. Five of Australia's housing markets are classed as 'severely unaffordable', with Sydney being Australia's least affordable housing market¹.

The impacts of a lack of affordable housing in Greater Sydney are far reaching, and people seeking affordable housing today include students, young people, recently separated or divorced people (often with dependent children), and 'key workers' who provide essential services such as childcare, education, emergency services, and hospitality services.



¹ Hughes, D. Financial Review, www.afr.com, 22 January 2020

1.1 PLANNING POLICY CONTEXT

The Federal Government does not have a direct role in housing policy and development. However, it contributes through tax exemptions/concessions and subsidies, such as its National Rental Assistance Scheme and the National Housing Finance Insurance Corporation scheme.

The State Government is primarily responsible for housing policy across NSW. The need to provide and maintain affordable housing is legislated in the *Environmental Planning and Assessment Act 1979*.

The State Government has enacted a number of *State Environmental Planning Policies* to assist in the delivery of affordable housing, including:

- **State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARH SEPP):** allows a range of housing types (e.g. boarding houses and group homes) where they are prohibited under local planning controls. It also provides bonus density uplift for high density residential development which incorporates affordable housing. One of the current limitations of this policy is that any affordable housing arising from the bonus density uplift can revert to market rental after 10 years, subject to Council's approval.
- **State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2005 (Seniors SEPP):** allows low rise (2 storey) residential flat buildings close to transport and services provided other requirements are met, and provides certain

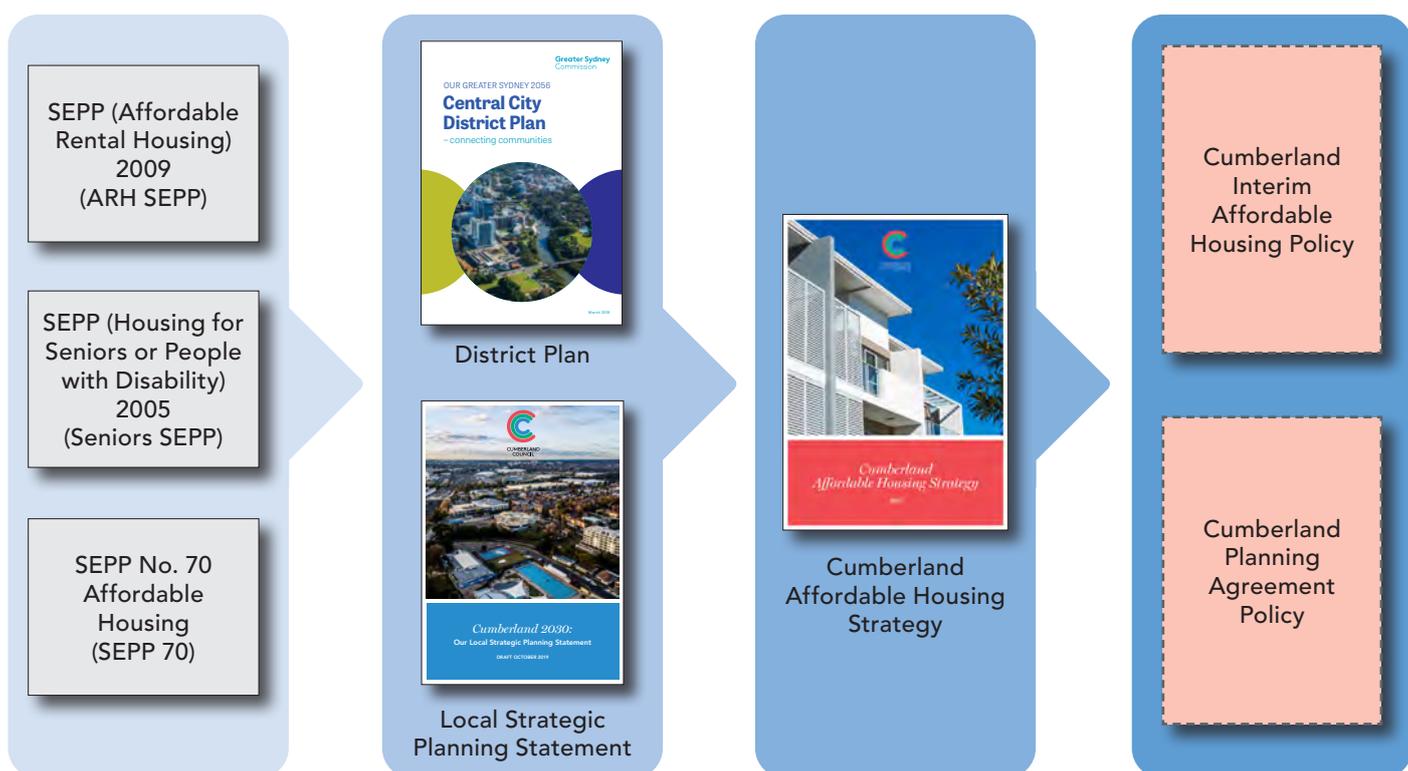
exemptions to the Land and Housing Corporation (LAHC) in terms of minimum lot sizes and lift requirements, as well as development contributions for social housing providers such as the Community Housing Sector.

- **State Environmental Planning Policy No. 70 Affordable Housing (SEPP 70):** The policy enables councils to levy mandatory affordable housing contributions. Its application is most effective when significant rezoning of land is planned, leading to significant value uplift and an opportunity for value capture for affordable housing.

The State government is reviewing these policies with a view to including additional definitions and a broader focus on housing diversity

The Central City District Plan recommends a range of 5-10% of new residential floorspace be affordable housing in the central city (comprising Cumberland City, Blacktown City, City of Parramatta and The Hills councils), and this is supported by *Cumberland 2030: Our Local Strategic Planning Statement* and the *Cumberland Local Housing Strategy*.

In terms of local policy, Council has an *Interim Affordable Housing Policy*, which will be reviewed following the completion of Council's Affordable Housing Strategy. Council has also adopted a Planning Agreement Policy which seeks the dedication of affordable housing to Council in perpetuity, as part of Council's current value sharing policy position.



1.2 CUMBERLAND CITY SNAPSHOT

It is estimated that over 10,700 new affordable housing dwellings will be required in Cumberland between 2016 and 2036, of which approximately 70% will be needed for very low income households, and 50% of which will need to be larger dwellings.

Central to the challenge facing Cumberland City is meeting the needs of its ever-growing part of the community that cannot meet its own housing needs.

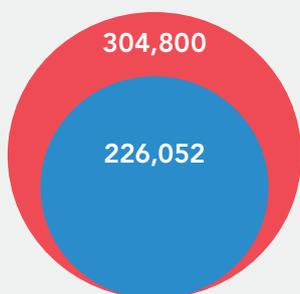
Cumberland City continues to experience high levels of population growth, with this trend forecast to continue to 2036. In terms of overall housing supply within Cumberland, 1,500 new apartments due for completion by 2021 with a further 12,200 in development stage, approved or under construction for the period 2019-2025.

However, housing affordability and mix remain key considerations for the Cumberland community, particularly given the diverse household structures and cultures within the community. There is growing demand for, but a declining supply of, large (3 bedrooms+) dwellings. In addition, significant growth in lone person households and people over 65 is forecast, which will require provision of smaller units to meet the needs of this part of the community.

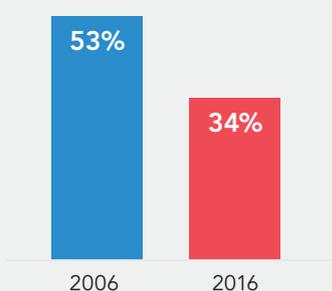
Housing considerations in Cumberland

POPULATION GROWTH:

35% change in population forecast between 2016 - 2036



SIGNIFICANT LOSS of affordable rental housing for low and very low income households



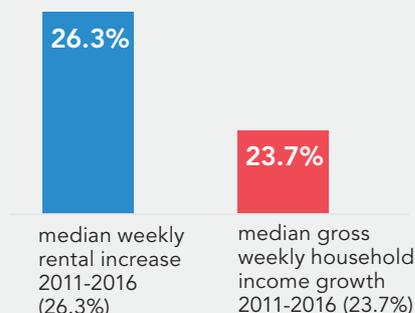
19,000 HOUSEHOLDS experiencing housing stress

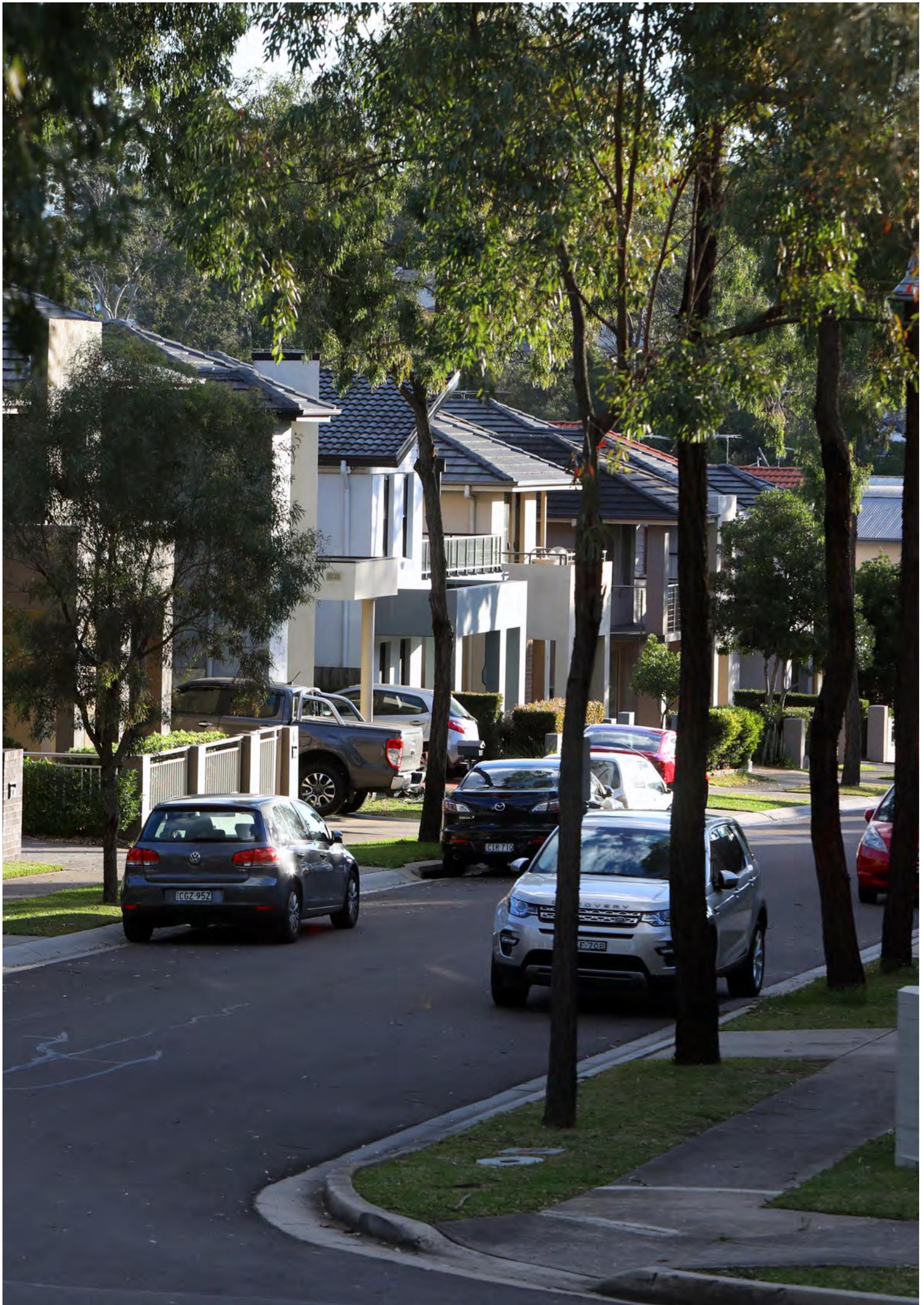


HOMELESSNESS increasing since 2011, with Cumberland currently the second highest in NSW, after City of Sydney



2.3% INCREASE in the price to income gap between 2011 and 2016, with rents increasing at a higher rate than income





Section 2: Considerations on affordable housing

There are a number of considerations on affordable housing in Cumberland. These include various forms and providers, demographics, recent case studies and future provision of affordable housing.

2.1 FORMS OF AFFORDABLE HOUSING AND HOUSING PROVIDERS

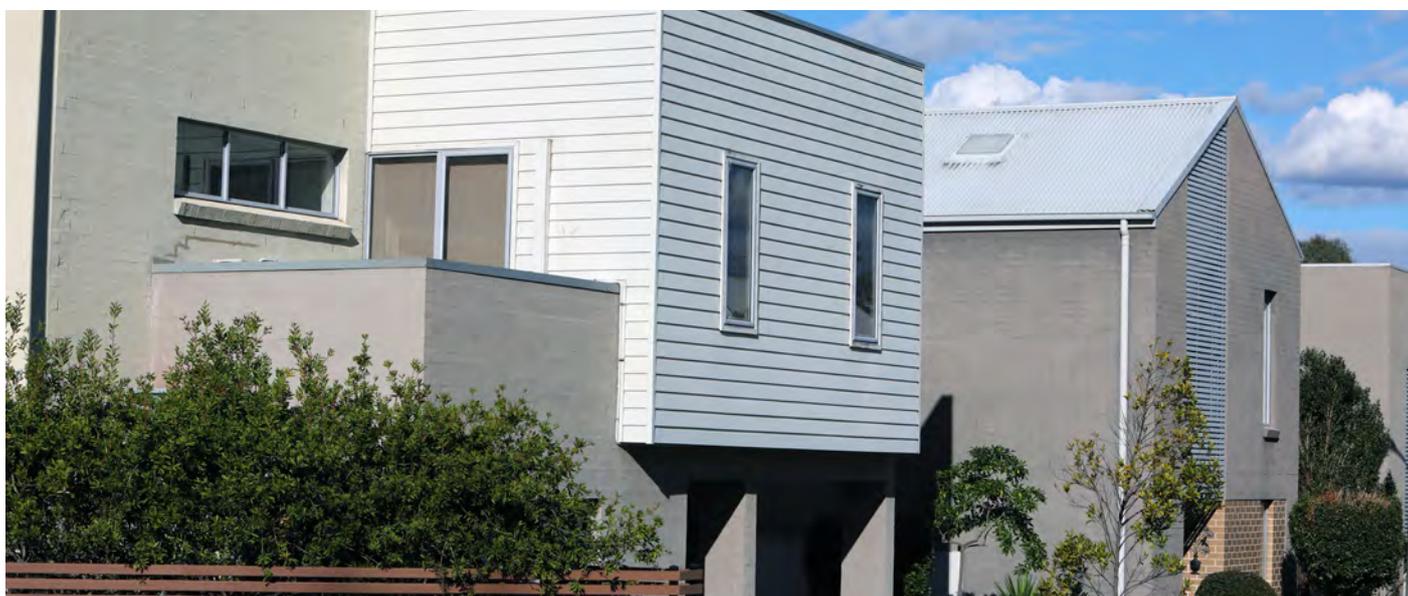
Affordable housing is a very broad term, used in different ways. There are many types of affordable housing and affordable housing providers, as well as partnership models of housing provision. The most common types of affordable and social housing within Cumberland are illustrated on the opposite page, along with the most common models of delivery.

There are 11 community housing providers currently active within Cumberland City, with Evolve Housing, Hume Community Housing, Bridge Housing, and SGCH managing the majority of Cumberland's community housing. Other not for profit organisations (such as religious organisations) are also active in the provision of seniors living and residential aged care facilities. Land and Housing Corporation (LAHC) are also very active in Cumberland, providing the largest proportion of social housing within Cumberland City, and is working strategically with Council on the planning of their future supply pipeline.

2.2 DEMOGRAPHIC OVERVIEW

Cumberland's population is relatively young compared with the average for Greater Sydney, and is highly culturally diverse. Just over 50% of the population was born overseas, and 66% speak a language other than English at home, with approximately 67 languages spoken across Cumberland City. Approximately 40% of Cumberland's population comprises couple households with children.

In terms of housing, although median rents in Cumberland are similar to Greater Sydney (9% lower), median household income is 23% lower. There is also a significantly higher than average proportion of very low and low income renters in Cumberland City, with very low income renters making up almost 40% of all renting households, compared with 30% for Greater Sydney. Between 2006 and 2016, median rents in Cumberland grew at a much greater rate than median incomes (24% growth in real (adjusted) rents compared with a 9% real increase in incomes). These rent to income ratios have also worsened far more when compared to Greater Sydney.

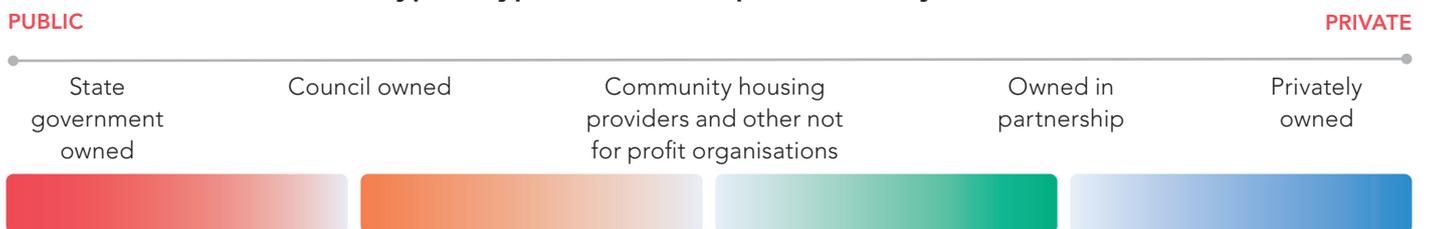


Opportunities for affordable housing

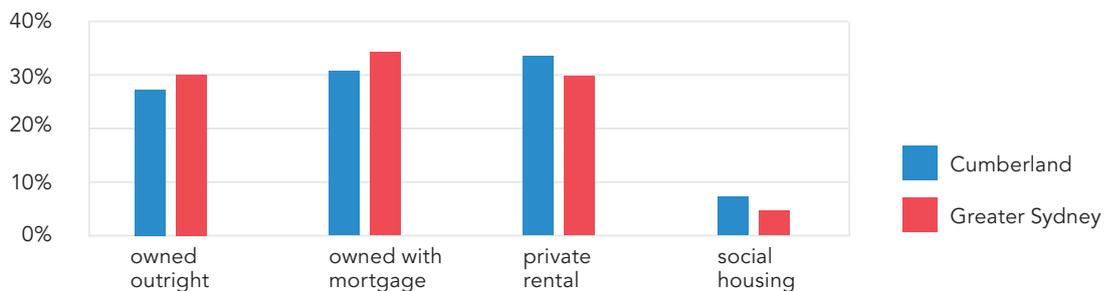
Types of affordable housing in Cumberland



Typical types of ownership and delivery

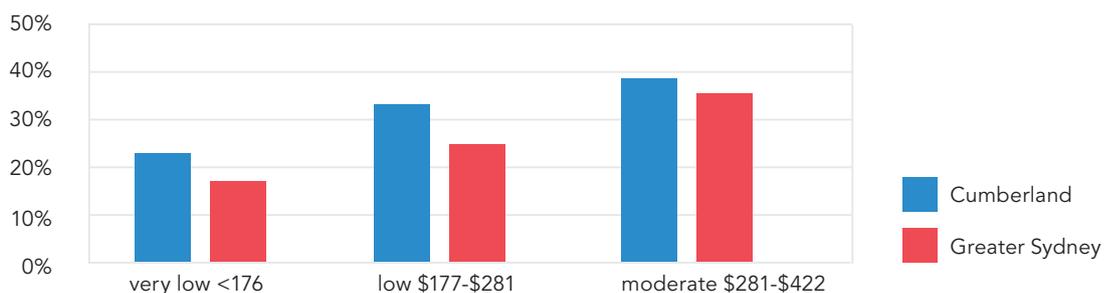


Housing tenure (2016)

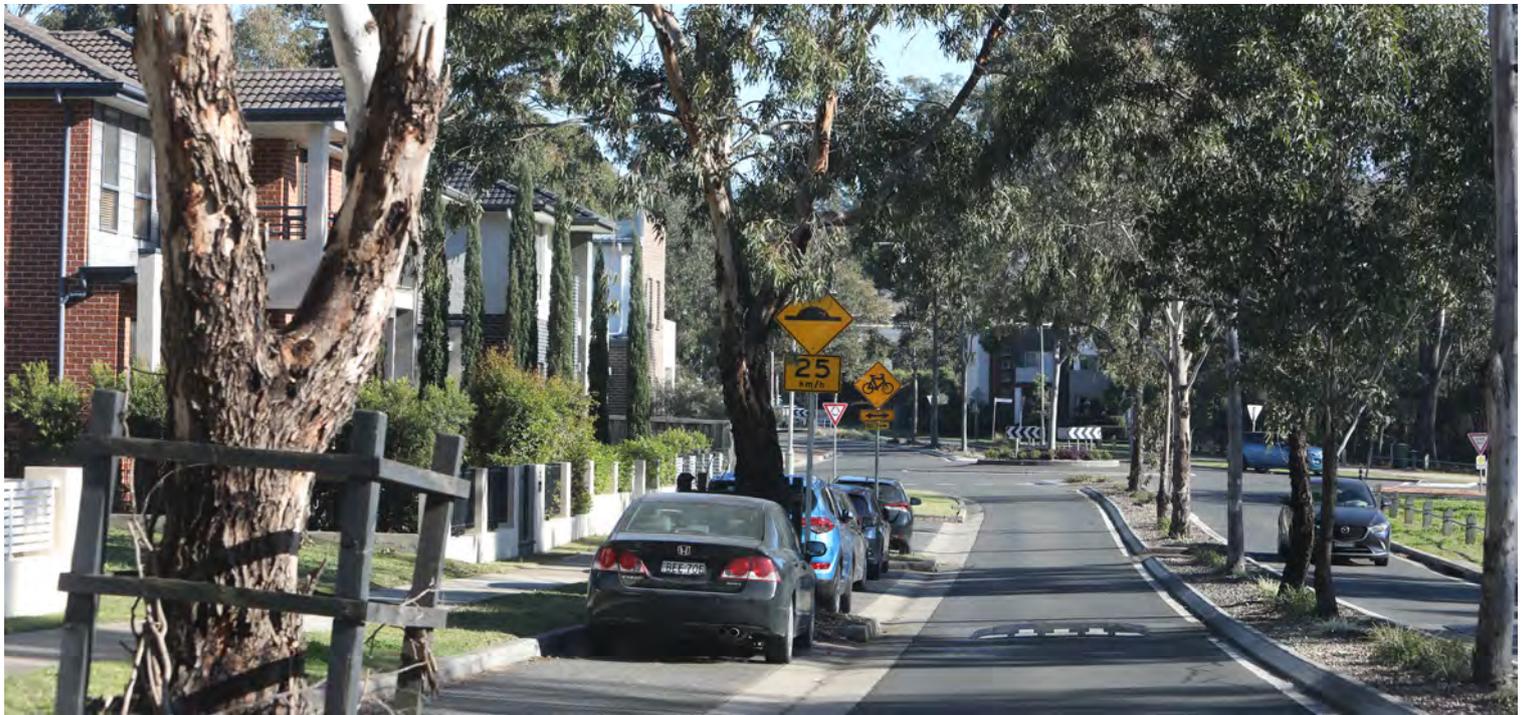


Source: ABS 2016 Census data

Change in rental properties available to very low, low, and moderate income households (2016)



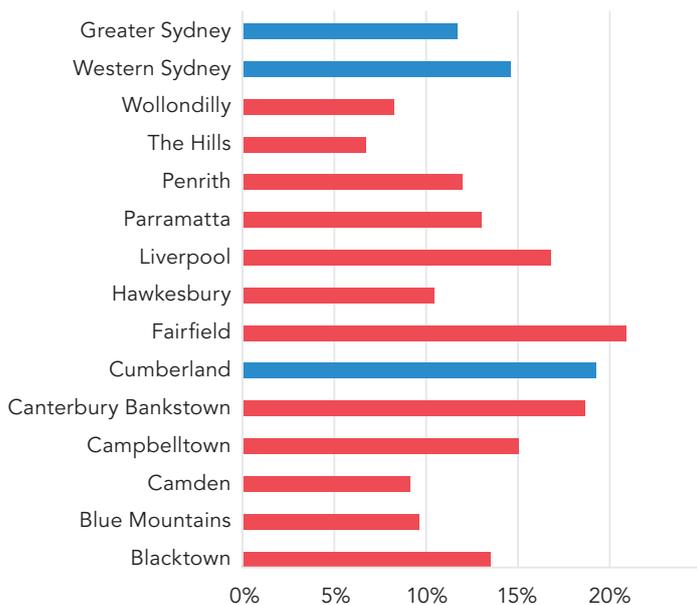
Source: Judith Stubbs and Associates, derived from ABS Census data



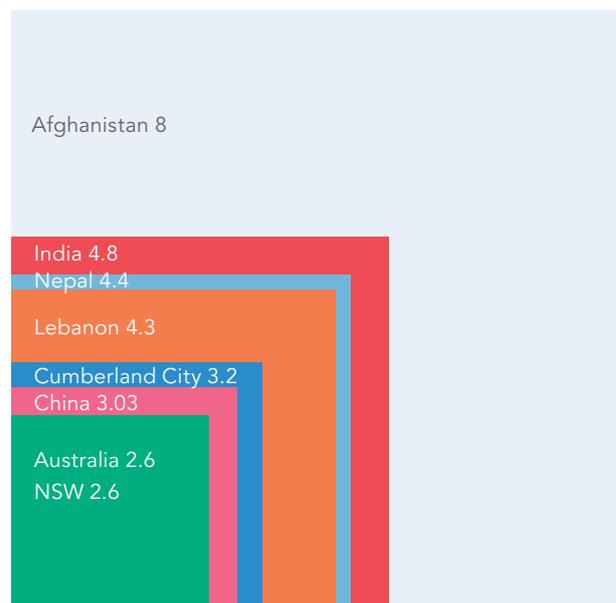
Homelessness is an important issue in Cumberland, with over 3,000 people identified in this category at the 2016 census. The ABS' definition of homelessness includes people living in boarding houses and staying temporarily with other households. Of the households in Cumberland classified as homeless in the 2016 census, 80% of these were classified as living in overcrowded dwellings under the ABS' definition of 'overcrowded'. It is important to note that many households within Cumberland encompass multi-generational families, and Cumberland's status as a place of first settlement for refugees is also a contributing factor.

An analysis of the average household size, based on Cumberland's top 5 countries of origin, reveals that four of these countries have an average household size of between 4-8 persons per household. This is above Cumberland's average household occupancy rate of 3.2 persons at the 2016 census, which in turn is above the average for both NSW and Australia, at 2.6. This highlights that whilst some households may be living in overcrowding dwellings within Cumberland, there is an important cultural overlay that needs to be considered.

Households experiencing housing stress (2016)



Cultural context: average household size (people per household) using Cumberland City top 5 countries of origin



Source: SGS Economics 2018 in Home in Western Sydney - Housing Affordability and Homelessness Insights (April 2019)



2.3 CURRENT AFFORDABLE HOUSING IN CUMBERLAND

Current affordable housing provision in Cumberland includes a mix of social housing, affordable rental housing, boarding houses, secondary dwellings and dual occupancies.

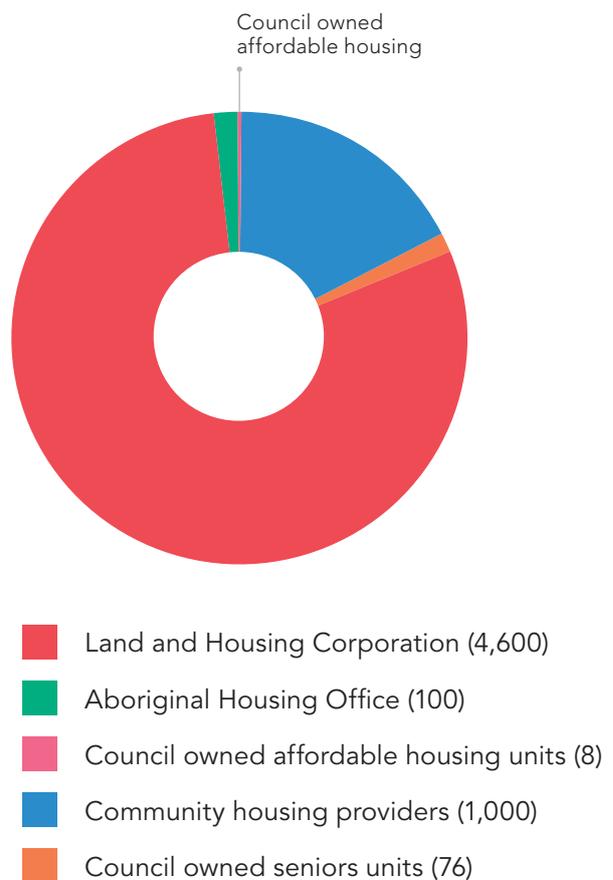
Almost 8% of all dwellings in Cumberland City are social housing. These are managed by Land and Housing Corporation (LAHC).

The four community housing providers currently active within Cumberland city manage approximately 1,000 dwellings, including 115 homes built with over \$45m of their own investment capital.

Council owns 76 seniors units located in Auburn and Lidcombe, and has recently negotiated 8 affordable housing units through a planning agreement in Merrylands East Neighbourhood Centre, which will be dedicated to Council (in perpetuity) once constructed.

Much of the affordable housing currently provided in Cumberland is based in rental schemes, rather than ownership.

Affordable housing in Cumberland by provider



Source: Land and Housing Corporation and Community Housing Industry Association NSW

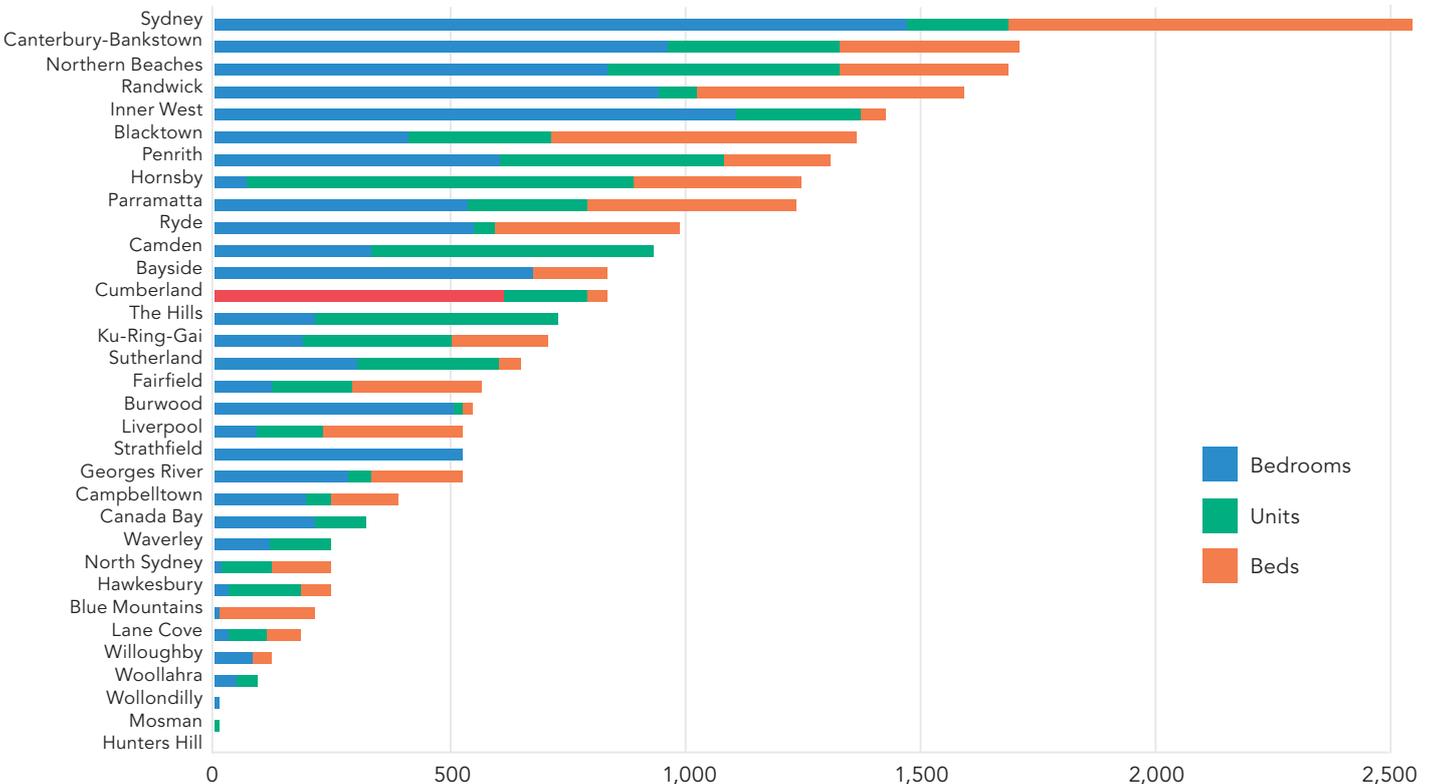
The Department of Planning, Industry and Environment’s data on the provision of affordable housing (referred to as ‘other dwellings’, and includes secondary dwellings, boarding houses, group homes, student accommodation and seniors living developments, including retirement homes, aged care facilities and hostels) shows Cumberland sitting amongst the top 14 Council areas in Greater Sydney in terms of overall provision of ‘other dwellings’, and top the 6 Greater Western Sydney Council areas.

Secondary dwellings and dual occupancies are a form of privately owned affordable housing as part of the affordable housing of the spectrum. The Department of Planning, Industry and Environment’s data over an 11 year period (2006/07-2017/18) shows Cumberland having the second highest total approvals in Greater Sydney, with an average of approximately 400 approvals per year during this timeframe.

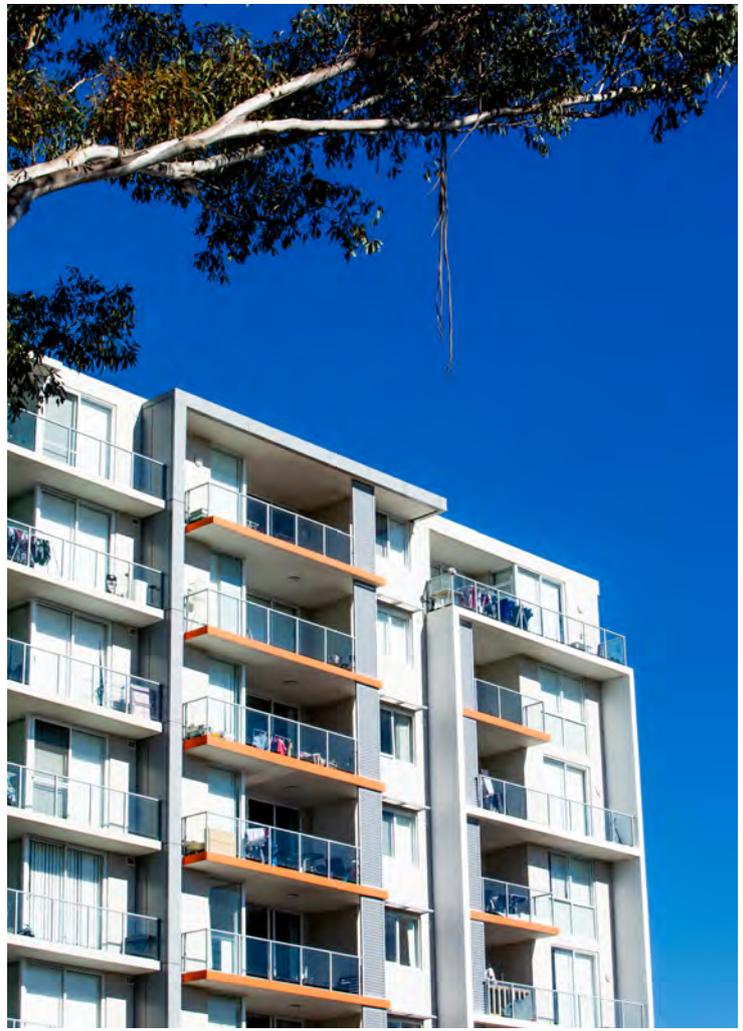
Build-to-rent development is an emerging form of development in Australia, and typically involves high density apartments held in single ownership, professionally managed, and with long term leases. Whilst build-to-rent housing contributes to housing diversity, it is not necessarily affordable, with affordability determined by rental rates.



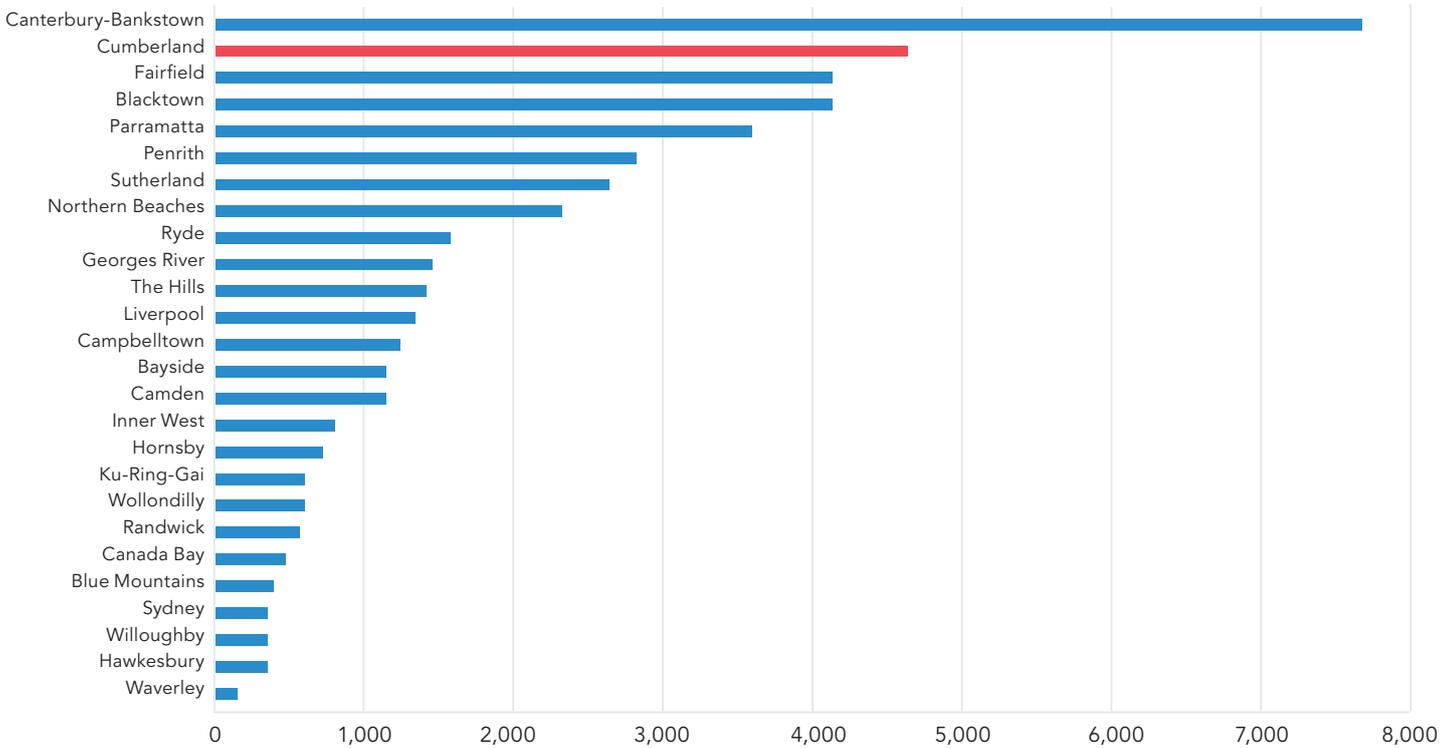
Other dwellings pipeline by type



Source: Department of Planning, Industry and Environment, 2020



Secondary dwellings and dual occupancies (FY 2006-07 to FY 2017-18)



Source: Department of Planning, Industry and Environment, 2020

2.4 CASE STUDIES

There are a number of examples that showcase the high quality and innovative provision of different types of affordable housing both within Cumberland and Greater Sydney. These case studies provide a starting point for further considerations of affordable housing in Cumberland City.

TETRIS VILLAGE, CLYDE STREET, GUILDFORD

Project by: Evolve Housing (community housing provider).

Development: 23 new-generation boarding house apartments with transformational furniture in a four storey building.

Details: 13 social housing units (including 6 apartments for women affected by family and domestic violence); 8 affordable housing units (including a caretaker unit); 2 youth units (for young people aged 18- 24).

Communal room and basement parking for 6 cars and 5 motorbikes.

Design features: ground floor traditional construction with upper three floors prefabricated units, resulting in significantly reduced construction costs and timeframes.



148-150 GREAT WESTERN HIGHWAY, WESTMEAD

Project by: SGCH (community housing provider).

Development: approved under the ARHSEPP infill development provisions; provides 67 new homes for social and affordable housing families.

Details: 6 storey building with a mix of one and two bedroom units, as well as ground floor retail and commercial space.



Design features: development is built to a 7-star rating under the Nationwide House Energy Rating Scheme (NatHERS). Winner of 2019 Urban Taskforce Affordable Housing Award.



MARRICKVILLE LIBRARY, MARRICKVILLE

Project by: Council's 9 affordable housing units negotiated via a voluntary planning agreement, and managed by a community housing provider.

Development: redevelopment of the Marrickville Hospital site, into a mixed use, mixed tenure development, including the Marrickville Library, and Inner West Council Multicultural Community Space.

Details: 250 residential units, 9 to be returned to Council and managed by a community housing provider partner.

Design features: development includes 1,200m² of public open space, adaptive reuse of heritage buildings and elements.



NICHOLSON STREET BOARDING HOUSE, WOLLSTONECRAFT

Project by: Link Housing (community housing provider) and North Sydney Council joint venture, with NSW State government funding.

Development: an existing, traditional boarding house owned by Council redeveloped into a two storey new generation boarding house.

Details: redevelopment funded by Link Housing, now shared ownership between Council and Link Housing. Accommodates seven tenants all aged over 60 years and two with a disability.

Design features: integrates seamlessly into the existing streetscape; attractive design, respectful of neighbouring properties and street.

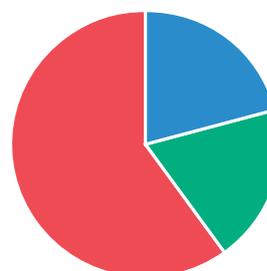


2.5 FUTURE PROVISION OF AFFORDABLE HOUSING IN CUMBERLAND

Analysis undertaken for Council indicates that between 2016 and 2036, over 10,700 additional affordable housing dwellings are forecast to be required in Cumberland. With this forecast, between 6,000 and 7,000 additional affordable housing dwellings have been identified in the anticipated development pipeline, with a gap of between 3,700 to 4,700 additional affordable housing dwellings to be identified and progressed through various mechanisms.

It is anticipated that the projected additional affordable housing will comprise a mix of dwelling types, tenures and locations across Cumberland. While many of these additional affordable dwellings are anticipated to be located in Cumberland's key centres and strategic corridors, some forms of affordable housing, such as secondary dwellings, are anticipated to be located outside of these areas.

Projected affordable housing supply scenario for Cumberland to 2036 (estimated dwellings)



- social housing (~2,300 21%)
- affordable rental housing, seniors living housing and boarding houses (~2,000 19%)
- secondary dwellings/dual occupancies (~6,400 60%)

Projected additional affordable housing need in Cumberland 2016-2036

	Smaller Dwellings (lone persons and couples)	Larger Dwellings (families with children and group households)	Total Additional Affordable Dwellings in Cumberland
RENTAL STRESS			
Very low income	1,524	1,870	3,394
Low income	465	1,317	1,782
Moderate income	138	518	656
SUBTOTAL	2,127	3,705	5,832
HOMELESS & AT RISK PEOPLE			
Very low income	2,574	78	2,652
Low income	N/A	N/A	N/A
Moderate income	N/A	N/A	N/A
SUBTOTAL	2,574	78	2,652
SOCIAL HOUSING			
Very Low income households	904	1,356	2,260
SUBTOTAL	904	1,356	2,260
TOTAL AFFORDABLE RENTAL HOUSING	5,605	5,139	10,744
SUPPORTED ACCOMMODATION BEDS			
Very low income	112	N/A	112

Source: Judith Stubbs and Associates calculations, using data from ABS Census of Population and Housing 2016, implied dwelling requirements, and Cumberland 2030: Our Local Strategic Planning Statement.

Secondary dwellings and dual occupancies will continue to provide an important contribution to the affordable housing mix. If the current approval rate of just over 400 per year continues, it is estimated over 6,000 additional secondary dwellings and dual occupancies could be provided between 2016 and 2036. The provision of secondary dwellings and dual occupancies offers a gradual supply of privately owned affordable housing distributed across Cumberland City, supporting key workers, young people, multigenerational families, as well as people looking to downsize, but remain within their existing neighbourhood.

In regard to social housing, Land and Housing Corporation (LAHC) has indicated that they will need to provide approximately 2,300 new dwellings by 2036, if the current rate of provision is to be maintained. They currently have over 430 dwellings across 33 projects approved or in the design stages, with a number of other projects also identified at more preliminary stages.

Council will continue to work collaboratively with LAHC to assist with their strategic planning work. In addition, strategic land holdings by LAHC and identified in the Communities Plus program, such as Lidcombe, South Granville and Westmead, provide key opportunities for future delivery of additional affordable dwelling capacity.

The local community housing providers continue to remain active within Cumberland. Council will continue to work collaboratively and build on existing relationships to appropriately facilitate the delivery of a variety of affordable housing projects by community housing providers.

Council-owned affordable housing negotiated through planning agreements, as well as through redevelopment of key Council-owned land in key centres and strategic corridors, may provide further opportunities to facilitate the delivery of affordable housing.

Strategic approach for affordable housing in Cumberland

VERY LOW AND LOW INCOME

MODERATE INCOME

Social housing	Boarding houses/ new generation boarding houses	Council-owned affordable housing and seniors units	Seniors residential aged care, affordable housing units and dwellings	Secondary dwellings and dual occupancies
Social housing dwellings either approved or at design stage, with potential for more. Land and Housing Corporation is looking to work collaboratively with Council in its strategic planning	Potential future affordable housing developments by community housing providers	Potential future Council-owned affordable housing dwellings through future planning agreement and longer term, via Council redevelopment projects	Potential through future development applications via Seniors Living SEPP and ARH SEPP	New secondary dwellings and dual occupancy approvals



Section 3: Priorities and Actions

The provision of affordable housing that meets the diverse needs of a growing sector of the community is a challenging issue. In the case of Greater Sydney, it is a metropolitan-wide issue and one that is disproportionately concentrated in Sydney's west, and increasingly borne by local government and not-for-profit organisations. It requires metropolitan-wide strategies, involving all levels of government as well as community housing providers and private developers.

Whilst Cumberland City Council cannot address the complexity of this issue alone, it can take a leadership role in terms of policy and planning, as well as continued collaboration with social and affordable housing providers. Advocacy for direct investment and stronger policy commitment and reform by State and Federal government will also be critical in working

to ensure that housing is provided for all existing and future residents.

There are four areas that will enable Cumberland to address this challenge: planning controls; policy; collaboration; and advocacy. These areas are translated into priorities and actions as outlined in this section.



PRIORITY

1

Planning controls that contribute to affordable housing feasibility and delivery

Council's recent strategic work, including *Cumberland 2030: Our Local Strategic Planning Statement* and the *Cumberland Local Housing Strategy*; has identified a program of strategic review of the planning controls in a number of the city's key centres and strategic corridors. This work will identify recommendations that may include revisions to planning controls, which can contribute to the delivery of affordable housing. There are also opportunities to ensure that affordable housing is facilitated through other planning controls, and to maximise the design quality through the development assessment stage of affordable housing that is assessed by Council.

District Directions	Local Priorities
Direction 3 – A city for people	LP 5 – Delivering housing diversity to suit changing needs
Direction 4 – Housing the City	LP 6 – Delivering affordable housing suitable for the needs of all people at various stages of their lives

ACTIONS		Timeframe		
		2020-2021	2022-2026	2027-2036
1.1	Progress the review of planning controls for key centres and corridors, with consideration of development feasibility, housing mix and parking requirements to facilitate delivery of affordable housing	•	•	
1.2	Input from Council's Design Excellence Panel, resulting in improved design of affordable housing at the development assessment stage	•	•	•
1.3	Review planning controls to ensure alignment with any affordable housing policy changes, as required	•	•	•

PRIORITY

2

Policy initiatives which support the delivery of affordable housing

Council’s existing policy framework presents a sound starting point for further refinement, to ensure continued affordable housing outcomes will be achieved in the future. In particular, Council’s current *Planning Agreements Policy* enables the negotiation of affordable housing units to be dedicated to Council in perpetuity via planning agreements. One of the key actions arising from this strategy will be to review and update Council’s *Interim Affordable Housing Policy*, to ensure that this continues to provide an effective local policy framework.

At the State level, Council will continue to advocate for effective improvements to the Affordable Rental Housing (ARH) SEPP and the Seniors SEPP. A review of SEPP 70 – Affordable Housing, which allows for Councils to establish a scheme to collect funds through development for the provision of affordable housing, indicates that this is not considered to be a viable option for Cumberland at this stage. The success of these schemes is largely reliant on the identification of new significant up zoning of land (both in magnitude and area) to cover the cost of affordable housing delivery. For Cumberland, significant rezoning has previously been undertaken at key centres and strategic corridors, and the focus in the future is to review and refine planning controls at these locations.

District Directions	Local Priorities
Direction 2 – A collaborative city	LP 5 – Delivering housing diversity to suit changing needs
Direction 3 – A city for people	LP 6 – Delivering affordable housing suitable for the needs of all people at various stages of their lives
Direction 4 – Housing the City	

ACTIONS		Timeframe		
		2020-2021	2022-2026	2027-2036
2.1	Review and update Council’s Interim Affordable Housing Policy	•		
2.2	Continue to seek affordable housing outcomes through planning agreements	•	•	•
2.3	Continue to collaborate with State government, and advocate for, improvements to the ARH SEPP, Seniors SEPP and SEPP 70 – Affordable Housing	•	•	•

PRIORITY

3

Effective collaboration with key stakeholders to maximise delivery of affordable housing on the ground

Effective collaboration across the industry sector has the potential to deliver tangible benefits far beyond what any organisation could deliver individually. An important ongoing action will be for Council to continue to build on its established relationships with local community housing providers and Land and Housing Corporation (LAHC), as well as industry bodies to maximise the delivery of affordable housing within Cumberland. This work will also complement the efforts undertaken to date in progressing the Cumberland Homelessness Sector Action Plan.

District Directions	Local Priorities
Direction 2 – A collaborative city	LP 5 – Delivering housing diversity to suit changing needs
Direction 4 – Housing the City	LP 6 – Delivering affordable housing suitable for the needs of all people at various stages of their lives

ACTIONS		Timeframe		
		2020-2021	2022-2026	2027-2036
3.1	Work collaboratively with public and private housing providers to facilitate the delivery of social, affordable and community housing, through strategic planning and other initiatives	•	•	•
3.2	Collaborate with key partners, including community housing providers, in the planning and delivery of any Council-led redevelopment, and consider opportunities for provision of affordable housing		•	•
3.3	Progress the Cumberland Homelessness Sector Action Plan	•	•	•



PRIORITY

4

Continued advocacy with all levels of government and the community to facilitate greater provision of affordable housing

Advocacy remains an important action for Council, particularly given the scope of the challenge associated with the provision of affordable housing. This challenge extends far beyond Cumberland City; it is a challenge facing all of Greater Sydney. While it remains a metropolitan-wide issue, the demand for affordable housing is disproportionately concentrated in Greater Western Sydney, and Council can contribute to this response.

Council will continue to advocate on a range of aspects related to housing policy, affordability, investment and delivery including:

- changes to legislation to achieve a better balance between landlords and tenants;
- improvements to the Affordable Rental Housing SEPP, such as requiring housing delivered under the SEPP to be linked to an affordability requirement;
- direct investment in social and affordable housing by the NSW State Government;
- recognition of social and affordable housing as infrastructure (and effective revenue and borrowing mechanisms to help fund it);
- collaborative advocacy with peak bodies and industry stakeholders on specific matters relating to affordability; and
- promotion of local affordable exemplars to all sectors, including private developers and the local community, to reduce stigma and foster excellence and innovation in affordable housing delivery.

District Directions	Local Priorities
Direction 2 – A collaborative city	LP 5 – Delivering housing diversity to suit changing needs
Direction 3 – A city for people	LP 6 – Delivering affordable housing suitable for the needs of all people at various stages of their lives

ACTIONS		Timeframe		
		2020-2021	2022-2026	2027-2036
4.1	Continue with State and Federal government advocacy, focused on policy improvements and direct investment in affordable housing	•	•	•
4.2	Work with community housing providers, peak bodies and other industry groups to collaboratively advocate on specific aspects of affordable housing provision as they arise.	•	•	•
4.3	Promote and showcase examples of different types of affordable housing in Cumberland City, to foster excellence and innovation in delivery and address community misconceptions on this form of development	•	•	•



CUMBERLAND
CITY COUNCIL

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