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ITEM 4

DRAFT HOUSING AND AFFORDABLE HOUSING OPTIONS PAPER - CONSULTATION FEEDBACK

On 16 March 2020, Council resolved to exhibit the draft Housing and Affordable Housing Options Paper. The draft paper was available from 19 March 2020, but due to COVID 19 the commencement of the formal exhibition period was delayed and occurred from 5 May 2020 to 10 July 2020. Fifty-one (51) persons made a submission on the website or completed the on-line survey. Eighteen (18) written submissions were received. Most submissions were supportive of the progression of many of the options into a draft Housing Strategy.

It is recommended that Council note the exhibition feedback and progress the preparation of the draft Housing and Affordable Housing Strategy.

RECOMMENDATION

- 1 The community feedback received during the exhibition of the draft Housing and Affordable Housing Options Paper be noted.
- 2 The feedback be used to guide the preparation of the draft Housing and Affordable Housing Strategy.
- 3 The draft Housing and Affordable Housing Strategy be reported to Council for endorsement prior to exhibition.

REPORT AUTHORISATIONS

Report of: Chris Stewart, Manager City Strategy

Authorised by: Linda Davis, Director Planning + Environment - Future City + Neighbourhoods

ATTACHMENTS

- 1 Community Engagement Summary Report
- 2 Feedback on Draft Strategies Presented in Option Paper

BACKGROUND

On 16 March 2020, Council considered the report on the draft Housing and Affordable Housing Options Paper and resolved that -

- 1 The draft Housing and Affordable Housing Options Paper be exhibited for a period of at least two months to enable community and stakeholder input.
- 2 The comments received be used to assist the development of a draft Housing Strategy and draft amendments to planning controls.
- 3 The inclusion in State Environmental Planning Policy No. 70 Affordable Housing continue to be progressed, through the development of an Affordable Housing Contributions Scheme and Development Feasibility Assessment.
- 4 A letter be sent to the Minister for Planning and Public Spaces objecting to the commencement of the Low Rise Medium Density Code, as the data in the draft Housing and Affordable Housing Options Paper demonstrates that this form of development is not required to address housing demand or affordability, and will not lead to good housing or community outcomes. The letter should also note Council's concerns surrounding the lack of consultation to neighbouring properties.
- 5 Prior to exhibition, the Draft Housing and Affordable Housing Options Paper be amended to include the following additional preferred recommendation in Table 6.1:
 - "5.8: Review the zoning and housing controls to limit housing densities north of Thirroul, having regard to network capacity constraints".



The draft Housing and Affordable Housing Options Paper was updated to reflect Council's resolution. The draft Paper and was available on Council's website from 19 March 2020 and formal exhibition occurred from 5 May 2020 to 10 July 2020, having been delayed by COVID.

In response to the exhibition process -

- Eighteen (18) written submissions were received
- Council's engagement website received 1,032 visits, of which 330 persons downloaded the draft report. Fifty-one (51) persons made a submission on the website or completed the on-line survey
- The three social media posts had a total reach of 23,512 and 55,952 impressions. The posts were clicked on 1,548 times and there were 219 clicks through to Council's engagement page. Forty one (41) on-line comments were provided.

The Engagement Report (Attachment 1) provides more detail on the exhibition arrangements and the comments, website survey results and submissions received.

PROPOSAL

The majority of actions identified in the draft Options paper received community support. Attachment 2 provides a summary of the draft actions listed in the draft Options Paper and feedback received. Of note there was -

- Support for the preparation of an Affordable Housing policy, Affordable Housing target and contributions scheme
- Support for the review of planning controls for environmentally and infrastructure constrained locations
- Support for the review of the medium density precincts to increase development opportunity
- Concern about over development in the northern suburbs and other locations.

Over the last 12 months, despite COVID restrictions and higher unemployment rates, median house prices have dramatically increased. Anecdotally, a combination of low interest rates, taxation settings, the ability to work from home and in regional locations, has resulted in people choosing to move out of Sydney and has increased the demand on housing in the regions. There has been a corresponding increase in rental costs, which has increased pressure for those households on low incomes.

Council needs to provide a balanced housing strategy that increases the housing stock, to house the growing population, whilst protecting the natural values of the Local Government Area (LGA) and responding to infrastructure constraints and community expectations. Many people don't like change in their street or suburb, but they also want housing to be available for their children and grandchildren.

The need to address Affordable Housing issues has become even more important. Council has limited ability to improve Affordable Housing outcomes as it relies on Federal and State policy settings.

The community feedback is being used to prepare the draft Housing and Affordable Housing Strategy. Some initial directions being investigated include -

1 Social and Affordable Housing

- Prepare an Affordable Housing Policy
- Set an Affordable Housing Target
- Continue to consider the progression of an Affordable Housing clause to be included in the Wollongong Local Environment Plan (LEP) 2009 (SEPP 70), including an Affordable Housing Contributions Scheme (consistent with the Inclusionary zoning action in the NSW Housing Strategy)
- Work with NSW Land and Housing Corporation to renew their housing stock and increase social housing



- Facilitate the development of partnerships between non-government organisations, development industry land owners and the community housing sector to deliver affordable rental housing
- Review opportunities to provide social or affordable housing consistent with action in the NSW Housing Strategy.

2 Responses to housing needs

- Continue to enable housing of the appropriate type in appropriate locations, including the review of the R3 Medium Density zone
- Increase supply of smaller dwellings
- Increase housing opportunities in and around Town Centres
- Revise the character statements for suburbs
- Review permissible uses in the Land Use Table for the residential zones
- Review the application of the R1 General Residential in City Centre
- Review the application of the SP1 Hospital zone, surrounding Wollongong Hospital in conjunction with NSW Health
- Consider housing opportunities within and surrounding Town Centres, provided employment opportunities are not compromised.

3 Responses to environmental and infrastructure constraints -

- Maintain housing restrictions in Illawarra Escarpment (along LGA), consistent with recommendations of the Illawarra Escarpment Strategic Management Plan (2015)
- Review development potential in Illawarra Escarpment foothills, currently zoned R2 Low Density Residential (along the LGA) especially sensitive sites eg 14 Cosgrove Avenue, Keiraville
- Maintain no housing development in Sydney's Drinking Water Catchment, by retaining the E2 Environmental Conservation zone
- Review development potential in constrained areas north of Thirroul
- Review development potential in environmentally constrained area such as floodways, watercourses / riparian corridors, coastal hazard areas bushfire prone lands
- Review noise controls along freight corridors, around industrial areas and the Port of Port Kembla.

4 Confirmation of policy settings -

- Retain Industrial lands for employment opportunities
- Protect the Illawarra Escarpment, significant bushland and ecological areas, floodplain, coast line from inappropriate development.

Three submission included the nomination of sites for rezoning consideration -

- Neighbourhood Forum 5 suggested the rezoning of 6-8 Grand View Parade, Lake Heights, owned by NSW Land and Housing Corporation, from R2 Low Density Residential to RE1 Public Recreation. The future of this site is part of on-going discussions with NSW Land and Housing Corporation.
- 25 O'Briens Road, Figtree Church of Christ. The site is currently zoned RU2 Rural Landscape, and is surrounded by land zoned R2 Low Density Residential. Consultants for the Church suggested that the site could be zoned R3 Medium Density.



 Former Bulli Bowling Club, Princes Highway, Bulli. Following Council's decision on 1 February 2021 to not support the preparation of a draft Planning Proposal for the site, as there was no strategic merit, the owners requested that it be considered as part of the draft Housing Strategy. The identification of the site in the draft Housing Strategy, or a Bulli Town Centre Study, would provide strategic merit for the rezoning of the site.

Consistent with Council's Planning Proposal Policy and advice from the NSW Department of Planning, Industry and Environment, the spot rezoning of individual sites is not supported. Draft Planning Proposal requests need to demonstrate strategic merit by being consistent with recommendations or strategies contained in local or regional strategic planning documents.

The assessment of the latter two proposals is on-going and will form part of the draft Housing and Affordable Housing Strategy.

As part of the assessment of Development Application No. DA-2020/4 for 14 Cosgrove Avenue, Keiraville, Council has received submissions that the current R2 Low Density Residential zone is in appropriate and the site should be rezoned to reduce development potential. The Development Application is subject to an Appeal to the NSW Land and Environment Court. The zoning and planning controls for this site, and others in the Illawarra Escarpment foothills, will be considered as part of the Housing Strategy.

CONSULTATION AND COMMUNICATION

The draft Housing and Affordable Housing Options Paper was available from 19 March 2020, but due to COVID19 the commencement of the formal exhibition period was delayed and occurred from 5 May 2020 to 10 July 2020. Due to COVID 19 the exhibition arrangements were modified and included -

- Have your say page and survey on Council's website. The website included -
 - Copies of the various reports
 - Survey
 - Video prepared by Illawarra Housing Trust on Affordable Housing
- Notification to peak groups UDIA, PCA, RDA, IBC
- Notification to all Neighbourhood Forums
- Notification to Statutory authorities
- Three social media posts
- On-line briefings to UDIA and PCA committees.

Council's engagement website received 1,032 visits, of which 330 persons downloaded the draft report. Fifty one (51) persons made a submission on the website or completed the on-line survey.

The three social media posts had a total reach of 23,512 and 55,952 impressions. The posts were clicked on 1,548 times and there were 219 clicks through to Council's engagement page. Forty one (41) on-line comments were provided.

Eighteen (18) written submissions were received.

Internal Divisions also provided feedback on the draft Options Paper and proposed directions.



PLANNING AND POLICY IMPACT

Ordinary Meeting of Council

This report contributes to the delivery of Our Wollongong 2028 Goal 5 "We have a healthy community in a liveable city". It specifically delivers on the following -

Community Strategic Plan	Delivery Program 2018-2022	Operational Plan 2021-22
Strategy	4 Year Action	Operational Plan Actions
5.3.1 Housing choice in the Wollongong Local Government Area is improved, taking into account population growth, community needs and affordability	5.3.1.1 Prepare a Housing Study and Strategy incorporating Affordable Housing Issues	Develop a LGA-wide Housing Strategy

CONCLUSION

The exhibition of the draft Housing and Affordable Housing Options Paper provided the opportunity for the community to have input into the preparation of the draft Housing and Affordable Housing Strategy. The report outlines the input received from the community and stakeholders received to-date, and indicates directions being examined as part of the preparation of a draft Housing and Affordable Housing Strategy.



Draft Housing and Affordable Housing Options Paper - Engagement summary report

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1 Exhibition arrangements

On 16 March 2020 Council resolved to exhibit the draft Housing and Affordable Housing Options Paper.

The draft Housing and Affordable Housing Options Paper was available from 19/3/20, but due to COVID 19 the formal exhibition period was from 5/5/20 to 10/7/2020. Due to COVID 19 the exhibition arrangements were modified and included:

- Have your say page and survey on Council's website. The website included:
 - Copies of the various reports
 - Survey
 - Video prepared by Illawarra Housing Trust on Affordable Housing
- Notification to peak groups UDIA, PCA, RDA, IBC
- Notification to all Neighbourhood Forums
- Notification to Statutory authorities
- 3 Social media posts
- On-line briefings to UDIA and PCA committees

2 Submissions

The community provided input via the engagement website, social media and by correspondence.

2.1 Website feedback

Council's engagement website received 1032 visits, of which 330 persons downloaded the draft report (table 1). 51 persons made a submission on the website or completed the survey, detailed in Table 1.

Table 1 Website document downloads

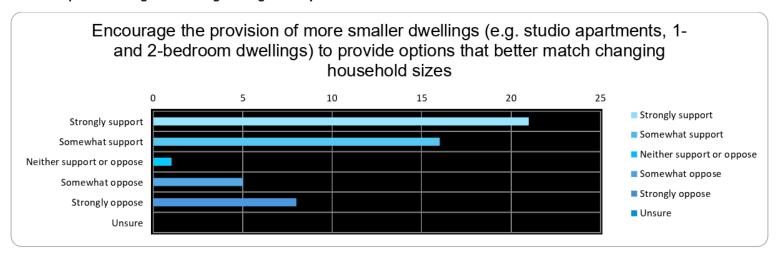
Document	Visitors	Downloads/Views
DRAFT HOUSING AND AFFORDABLE HOUSING OPTIONS		
PAPER - March 2020	211	330
Wollongong City Council Report - 16 March - Item 2 - Public Exhibition of Draft Housing and Affordable Housing		
Options	31	39
Wollongong City Council - Missing Middle Testing Paper		
2020	25	30
Housing Our Community Discussion Paper May 2017	25	38
	20	21
Wollongong Residential Density Study Final Report 2015	20	21
Wollongong City Council meeting minutes 16 March 2020	11	11
Wonding dry Council Meeting minutes to Waren 2020		
Frequently Asked Questions	80	87



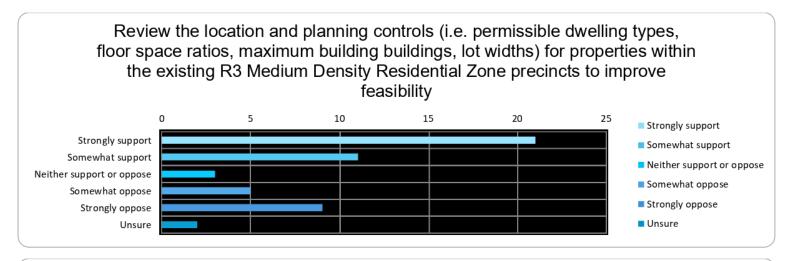
Website survey

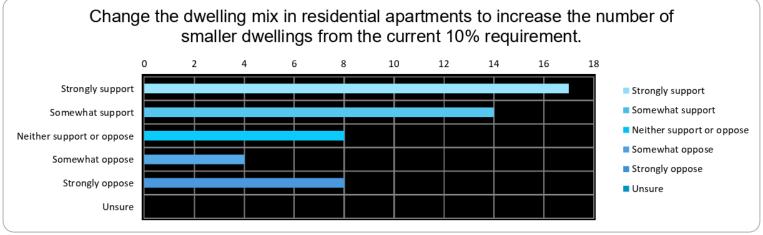
The following graphs summarise the feedback received on the website survey

A. Proposals relating to increasing housing diversity

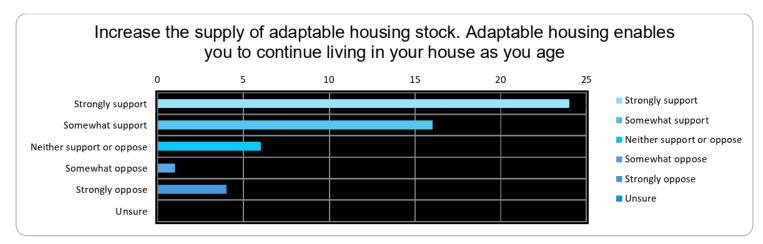


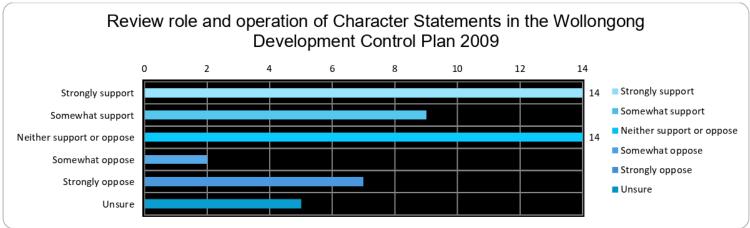




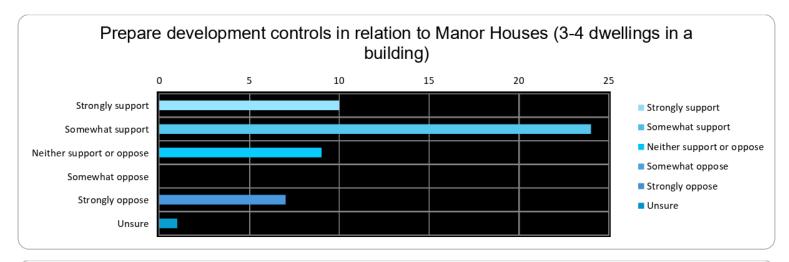


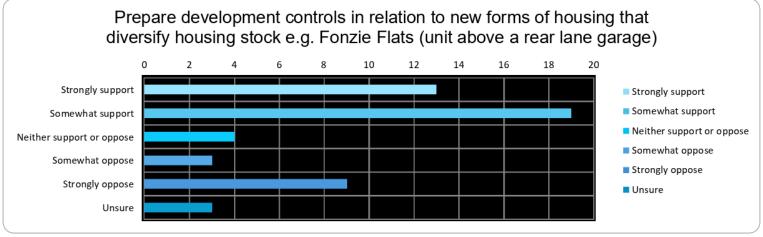






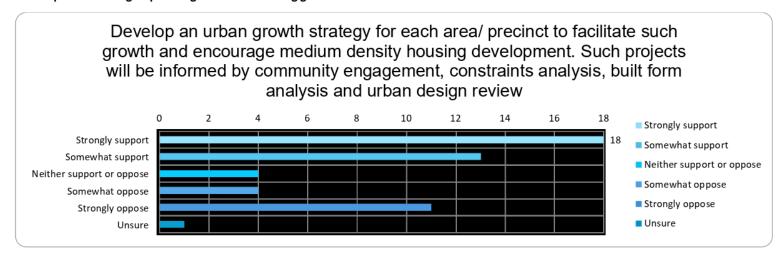




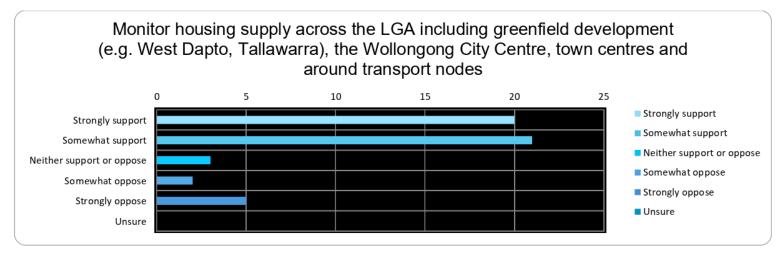


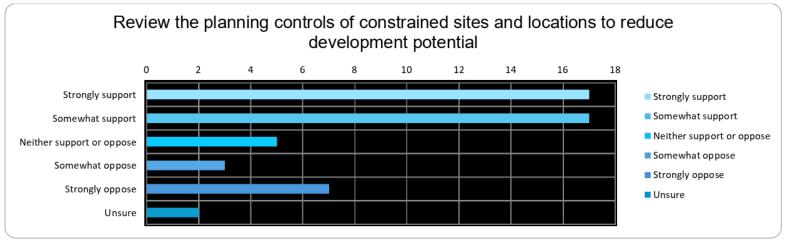


B. Proposals relating to planning for future housing growth

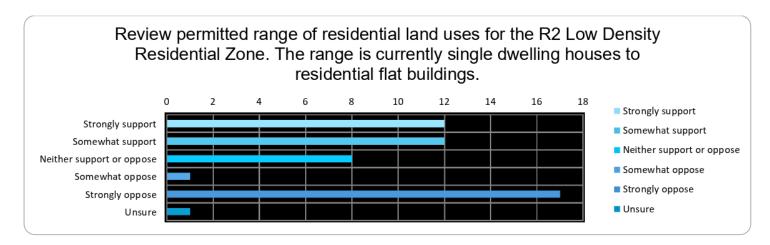




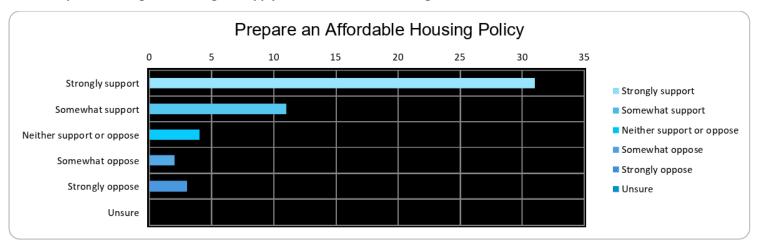




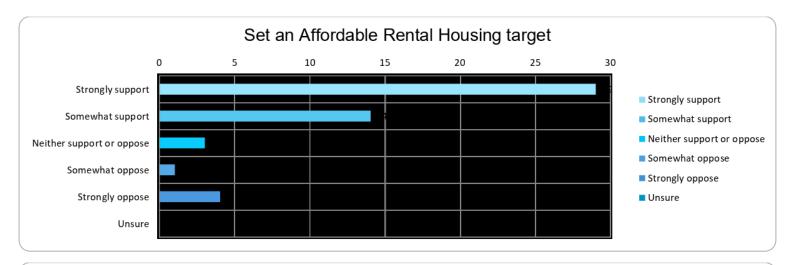


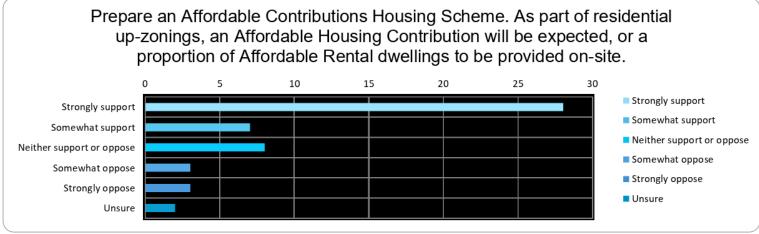


C. Proposals relating to increasing the supply of affordable rental housing stock

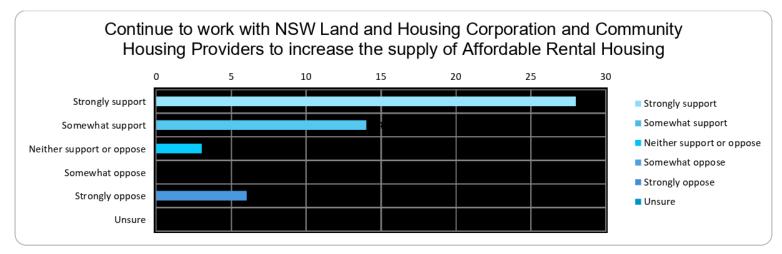


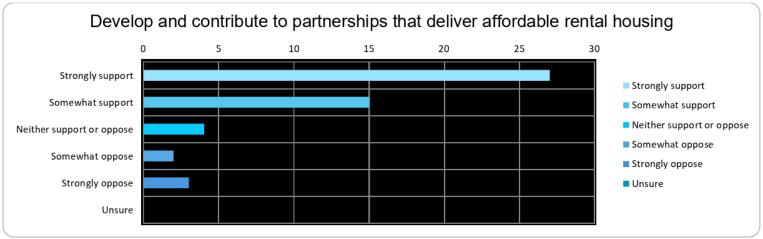




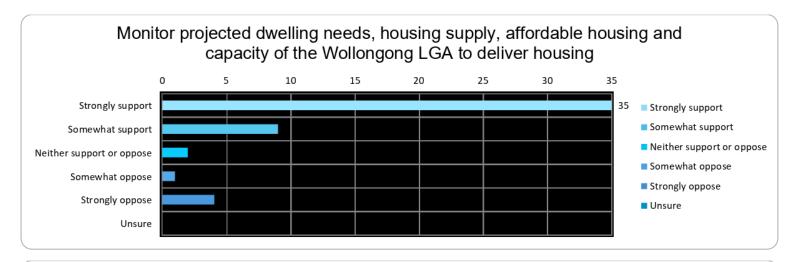


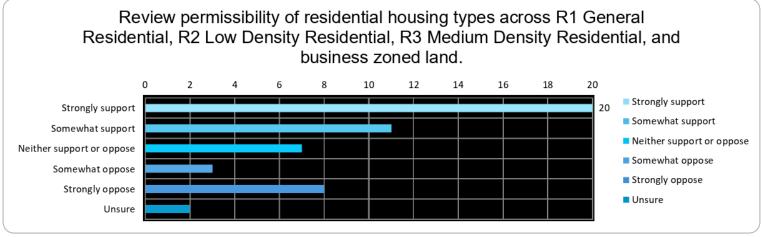






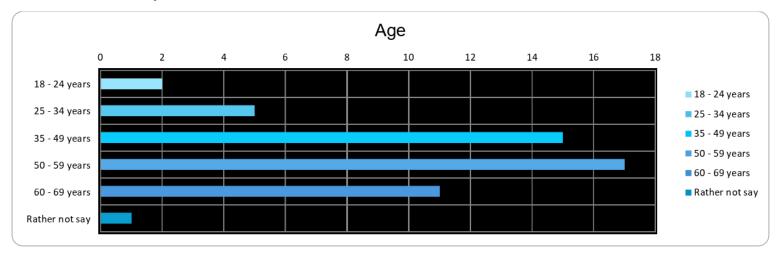


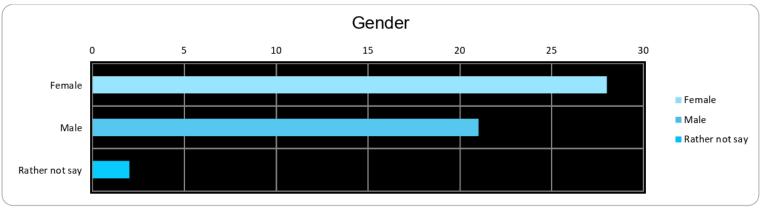




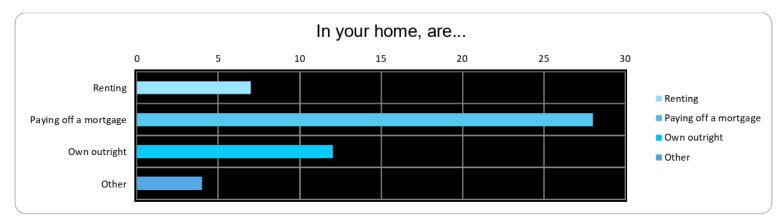


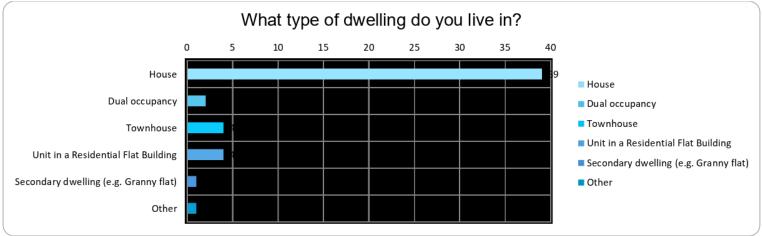
D. Submitter summary



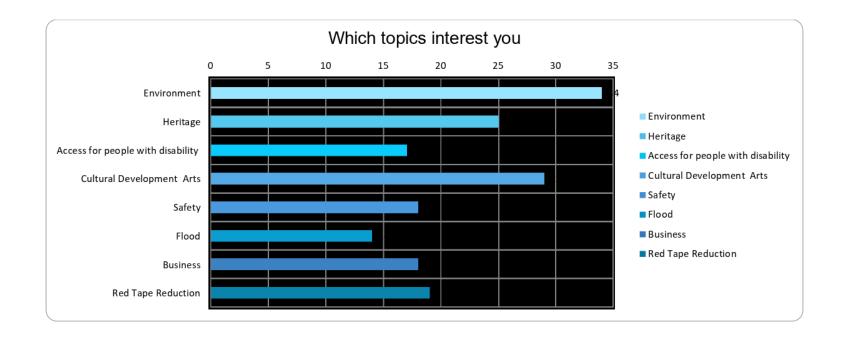












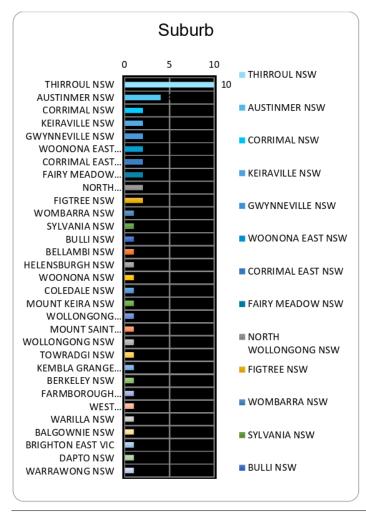




Table 2 Website Free Form comments

What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
Austinmer	House	Paying off a mortgag e	60 - 69 years	Male	Villages should be encouraged to have more smaller dwellings, rather than a single dwelling on a large lot, such as in Thirroul. There could be more encouragement for developers to consider a variety of smaller dwellings such as one bedroom and studio apartments in a smaller development.	The options paper should consider a variety of housing needs that encourages closer community contact between all people ranging from your couples through to seniors. The single standalone dwelling on a large lot if of use to a certain type of family, which is not the majority in Australia. The options paper could also consider the idea of communally owned development such as the Nightingale Model from Victoria. This type of development would apply to certain villages which were close to transport and other services that appeals to couples with young families and also to seniors who could be closer to their children
Corrimal	House	Own outright	60 - 69 years	Female	Not on any suburbs as such, however, a key issue is housing with security of tenancy. It is untenable that a person renting has no security when renting from a private landlord, and can be asked to leave when, for example, a landlord wants to use the home for a friend. Affordable housing needs to be near public transport and not on hills that are impossible to negotiate with a pram or in a wheelchair, or even without footpaths!	It gives me hope for the future of Affordable and social housing, however, I urge you to fast-track the building of affordable housing as the waiting list is awful and having homeless people in our city is a public disgrace. During the pandemic people are housed in hotels, and I am seriously encouraging Council to develop that kind of small dwellings, where people are safe, and can feel pride in having a roof over their head. A roof that is not taken away from them the moment they have financial difficulties, or on a whim of the landlord. Please be aware that there are still unscrupulous developers who are developing sites for 'boarding houses to alleviate homelessness' but which turn out to be houses for transient workers, and too costly for the homeless.
Wollongon g	Townhou se	Paying off a	35 - 49 years	Female	Around the University - overcrowding by students renting houses & noise & nuisance issues, in North Wollongong overcrowding by	I haven't read it yet, but I will & I will send in my views separately



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
		mortgag e			Uni students renting units. Cost of rental in North Wollongong is very high.	
Wombarra	House	Paying off a mortgag e	50 - 59 years	Female	Thirroul LGA & Bulli with potential over development of Thirroul Town centre and McCauleys estate	
Keiraville.	House	Own outright	Rather not say	Rather not say	With the medium density push for housing into 2500 post code area, I would suggest the push for medium density should remain around transport and shopping centre localities along the Princess Highway extending north and south, and not into the foothills of the Illawarra Escarpment in any suburb. Council's current documents identify east of Robson Road for greater development which is being ignored in recent development approvals.	This survey does not clearly spell out the ramifications of the questions being posed, taking into account any reading of the Housing Affordable Options Paper, any person completing this survey is doing so without clarity. The results of the survey are therefore invalid.
Sylvania	House	Other	60 - 69 years	Male	Helensburgh, This area has enormous potential for housing. There are large areas of unused land, most of it in private ownership. This land is locked up in E2/3/4 zoning's and the reason for this is the recalcitrant attitude of WCC town planners. After decades of trying to get land rezoned for housing in this area, I believe that its time for WCC to revisit Helensburgh and to get an independent assessment of the land that is available and working toward changing the zoning's and allowing residential development in this area.	No, but WCC need to increase the housing supply in the municipality. The northern area has the space and all other facilities. Water, Power Sewerage, to expand without causing any problems to the environment.



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
					Sooner or later WCC will be forced to release land in Helensburgh /Otford by the sheer pressure of population. People have to live and start family's and this is the ideal area to do it.	
Thirroul	House	Paying off a mortgag e	50 - 59 years	Female	Thirroul is a heritage area without protection. Please put in some development constraints to preserve the remaining character before it is lost.	
Bulli	House	Paying off a mortgag e	35 - 49 years	Male		
Woonona	House	Paying off a mortgag e	25 - 34 years	Female	Affordable housing should be available in every suburb and not just restricted to a few suburbs. The northern suburbs seem to contain less and less affordable housing and I worry that this could mean less diverse and inclusive suburbs, rather than more.	Affordable housing is needed near good public transport routes (or perhaps good public transport is needed near affordable housing - whichever order you want to build it in). Refugee-specific needs should be addressed. I would like to see an exploration of how to better use existing housing stock (e.g. managing programs that link residents with a granny flat or similar with those who need them). A good example of this is the UOW Homestay program which provides training, mediation, and manages the relationships so that if the visitor (tenant) or family (landlord) has difficulties, they can be addressed quickly and easily. This could be a great model for Wollongong to use more broadly.
Gwynnevill e	House	Paying off a mortgag e	50 - 59 years	Male		



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
Bellambi	House	Renting	35 - 49 years	Female	In addition to affordable rental housing for people with lower incomes, affordable options for people to own housing at a range of income levels that cannot afford to buy in the current market is important to community diversity and resiliency.	I still have to read the paper, I assume I'll be able to provide comments separately!?
Helensbur gh	House	Own outright	50 - 59 years	Female	In the draft paper it listed that 81 single dwellings houses were required for Helensburgh by 2036 and in the same paper it stated that the proposed Lady Carrington Estate would deliver 300 low density dwellings, almost a 350% increase on what has been forecasted.	It appears that the paper is not objective in terms on how the existing infrastructure would be enhanced to cater for additional population growth. Don't want the situation were council increase the population, without any regards for the negative impact it will have on existing residents, lack of foresight on increasing the capacity of existing infrastructure to accommodate all residents, so that they live in an harmonious environment
Woonona	House	Own	60 - 69 years	Male	While there will obviously be a need to continue to develop housing in the CBD and in other suburbs of Wollongong, I consider that approval the construction of new apartment buildings in excess of 8 stories, like the monstrosities recently erected, is totally inappropriate for Wollongong. The natural beauty of Wollongong, a city resting between the mountains and the sea, does not need high-rise apartment buildings destroying the natural beauty of the landscape right in the middle of the city, nor along its beautiful coastline. Any building height changes need to follow the natural contour of the landscape, keeping building in the areas of Wollongong closest to the sea at lower levels and allowing just a steady increase in building	As in my comments in 4 (above), I am concerned that proposed changes to planning controls does not end up turning our beautiful city into a high rise slum. Yes, affordable housing is an important issue but crowding people into high density buildings or suburbs would have disastrous social and community outcomes.



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
					heights stretching back toward the mountain. Wollongong must not become another coastal eyesore, like those produced by excessive high density, high rise apartment buildings that have been approved by Councils in Sydney and along the beaches of Queensland. Attempting to change existing building density guidelines and planning controls that protect our city from over-development along the coastal fringe under the pretext of community discussion papers is not fooling anyone. I don't approve of surveys that are loaded with questions and scenarios that are ambiguous and obviously constructed in an attempt to support a predetermined outcome. If you want the communities support you need to get real people to design clearly articulated questions that are concise and unambiguous.	
Coledale	House	Paying off a mortgag e	50 - 59 years	Female	Clifton to Bulli cannot have more developments where one house is replaced by 4 or 6 town houses. The traffic congestion is becoming to hectic especially when there is one road in & out. Also the land is zone bushfire risk, tourism on weekends is massive a road infrastructure needs to be reviewed.	Affordable housing needs to close to railway stations.
Austinmer	House	Paying off a mortgag e	60 - 69 years	Female	We need to develop housing around transport areas such as Thirroul, Wollongong and Dapto. To include more bike friendly paths to encourage less usage of cars within	The majority of residential development in the smaller villages and towns should allow greater diversity of low cost affordable housing and different housing options, such as studios, smaller one bedroom apartments, within



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					busy villages such as Thirroul. To allow more flexibility around the Zone R2 areas to allow studios, Fonzie flats and Granny flats in this Zone.	a single dwelling. This would allow seniors or young couples who are seeking to live in a village but without the huge cost of purchasing an apartment or single dwelling.
Woonona East	House	Paying off a mortgag e	50 - 59 years	Female	Woonona East. On the basis of the changes you are considering, our neighbours are planning to build TWO two-storey houses (not dual occupancy units) with a footprint that will cover almost their entire block. This will significantly overshadow our property and cause privacy issues. Their architect has advised them this design will be permissible once your foreshadowed changes go through. This is a quiet residential street with mostly single houses and a couple of newer dual occ apartments.	I have no objection to introducing more affordable housing in the LGA, but please don't allow these changes to be a money-grab for people to over-develop their residential blocks and destroy established neighbourhoods.
Mount Keira	House	Paying off a mortgag e	35 - 49 years	Male	YES, my concerns are the escarpment and how close to build on it, especially in established areas where the roads cannot handle the traffic	
Corrimal	Other	Other	35 - 49 years	Male	The amount of vacant units, these can be used as affordable housing. The recession has many vacancies and the price of rent will fall. With the all the units being built we have a lack of car spaces for the elderly and disabled.	When do the landlords decrease the rent? When dept of housing put people in them?
Wollongon g	Townhou se	Paying off a mortgag e	50 - 59 years	Female	Wollongong looks horrendous - there are way too many high rise, clearly Council's grab for grubby cash and lining their pockets to get more rates but the infrastructure of the town does NOT support this obvious over development. Parq is a disaster and the roads	good idea



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
					around there will not support that over development, the accidents that will happen near that roundabout and Keira St will occur, the towers in Market St and near the train station are also ugly, towering messes, casting unnecessary vile shadows across the city again with no thought to logistics, infrastructure and roads being able to support the increase in traffic and how much the parking will not be able to support this increase in dwellings - horrendous despicable mess	
Fairy Meadow	Secondar y dwelling (e.g. Granny flat)	Renting	25 - 34 years	Male	I think the growth of property prices in places that were previously (within the last 5 years) affordable (e.g. Dapto) for first-home buyers/young-families has outpaced the potential for these first-home buyers to save and buy within these suburbs. I think the idea of the left-hand building comparison (100DU/HA) on page 12 of the draft paper would better suit inner-city suburbs better, even so far as a range as Unanderra - Bellambi. Furthermore, the foot-print required to live in a house for the average person is quite large (in general), however while many builders would love to build and sell smaller (possibly even tiny home sized) houses current building codes do not allow for such flexibility. This would alleviate many housing concerns	Honestly, I haven't read it: it's insanely long for a draft paper. I'm providing this feedback as a tertiary educated potential first-home buyer as its unlikely you will get many people actually read and provide genuine feedback about it within its current form.



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
					initiated in the previous multiple choice questions surrounding small spaces used within apartment buildings. My only concern with this is it will likely end up with people buying property that won't significantly increase in value and be stuck in an awkward loop of mortgage debt and minimal ability to expand beyond this space.	
Mount Saint Thomas	House	Paying off a mortgag e	35 - 49 years	Male	Affordable housing should not be constrained to "affordable areas." The existing public housing in "desirable" locations such as Cliff Road should be retained, giving residents of public housing the opportunity to live in and enjoy such locations.	
Wollongon g CBD	Unit in a Residenti al Flat Building	Own outright	60 - 69 years	Female	CBD of Wollongong. Oversupply of units without support services as many developments involve over 55s but in reality are over 70s. Crown Mall from top to sea in decline meaning those accessing views, higher value apartments are further removed from services - and car parking access nightmare for short term - supermarkets, pharmacies, other services like hair and clothing	
Towradgi	House	Paying off a mortgag e	35 - 49 years	Male	Escarpment abutting suburbs should be low development. Attention should be paid to environmental protection of critically endangered fauna and flora in the area. Housing should neither be dense nor multistorey in low-density suburbs.	Why does the housing stock have to grow? Why is the natural environment and it's preservation not too priority?



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
Corrimal	Dual occupanc y	Own outright	35 - 49 years	Female	Na	Na
Thirroul	House	Paying off a mortgag e	35 - 49 years	Male	Yes Thirroul is over populated and future development needs to stop	I agree with creating affordable housing but if it effects stability of a community than other areas need to be considered
north Gong	Unit in a Residenti al Flat Building	Paying off a mortgag e	25 - 34 years	Male	North Wollongong should be higher density in CBD style, with lower density further out.	It's definitely moving in the right direction for the growth of the area.
Corrimal	House	Paying off a mortgag e	35 - 49 years	Female	As an organisation that represents the needs of vulnerable older people, suburbs that are close to medical and hospital precincts are of particular interest to us for the development of affordable housing options. Locations with access to transport should also be prioritised for affordable housing.	Age Matters, an initiative of IRT Group supports many of the recommendations suggested in the Wollongong Draft Housing and Affordable Options Paper. In particular, we appreciate the inclusion and specific mention of older people and an ageing population as a key priority. With the proposed recommendations proposed in Table 6.1 we suggest that item 1.4 relating to adaptably developments be made a high priority. We also suggest that recommendation 1.6 includes opportunities to investigate other innovative housing supply options such as tiny houses. We would like to see the paper mention the importance of incentives for share/co-housing arrangements, as well as consideration of the wraparound support services that many people require to maintain their tenancies/accommodation. We are pleased to see Council's efforts in developing an Affordable Housing Contribution Scheme for Wollongong LGA under SEPP 70. We would like to ensure that SEPP allocations also consider the unique needs of our ageing



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
						population. If a quota for affordable housing development isn't appropriate for high-need group such as older people, it misses the target. We also appreciate the level of diligence required for implementation of the scheme, but highlight that lengthy delays in the process will not meet the immediate need that we see right now in our community. We also strongly support the item 3.10 – partnerships for development and innovation. We agree it is really important to leverage our community capacity and endorse WCC's approach to developing and contributing to partnerships that deliver affordable rental housing. As relationship development is a key cornerstone of partnerships, it would be great to see the principle of partnerships filtered throughout Council's operational principles so that conversations are had with the right people at the right time. Reviewing the range of issues addressed in the options paper we would like to add the following commentary: We support the creation of studio, 1 and 2 bedroom dwellings, to provide options that better match household sizes. As your report confirms, the location of smaller housing stock (studio, one, two bedroom houses) is declining and unevenly distributed throughout the LGA. The suitability of housing and mismatch between household composition and housing type in the Wollongong LGA is already a pressure felt deeply by older people and continues to present a challenge for the future. We encourage WCC to use the Illawarra Shoalhaven Regional Plan 2015 – advocate to NSW Government to



What suburb do you live in? What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
					address the housing affordability gap. We agree that viewing affordable housing options through the continuum of housing framework and identifying the gaps offers a comprehensive approach to the issue. • For our clients, older people who require affordable housing, transport is a key factor in appropriate locations. We would like to see Council continue to advocate for better rail services near potential medium density development sites to increase the feasibility of these locations. • We note that Wollongong LGA ranks second from the bottom for new supply of planned and complete community housing dwellings. We strongly encourage Wollongong to benchmark their developments against similar regions in the state. (Source: http://communityhousing.org.au/wp-content/uploads/2020/06/CHIA_brochure_NSWsnapshot_100620_D4.pdf) • There appears to be a lack of understanding of the specific needs of older renters who require affordable housing that is appropriately located, accessible and safe. Aged Care should not be considered a 'housing' option as trends increasingly promote 'ageing-in-place' in contrast to residential aged care looking after the most frail as they approach end of life. • We are very concerned about the significant lack of affordable housing for people on low incomes. When you factor in the specific needs of older renters, the pool of appropriate properties decreases significantly. • We would like to see more information on the remaining funds from the Australian Government Grant



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
						for Affordable Housing Initiatives, with a growing need for these funds to be put to use quickly. • There could also be some benefit in revisiting key locations of Wollongong land that is available for redevelopment, but also in flood risk zones. While generally not appropriate to further disadvantage vulnerable groups by developing affordable housing on atrisk locations, there may be some basis for medium density developments in some prime locations to better serve the population needs. If affordable housing developments were sited on less hazardous areas within the zone or building controls were adopted to address the risk, it may be worth investigating.
Kembla grange	House	Paying off a mortgag e	35 - 49 years	Female	Yes I do not think flats should be placed in the area of the sanctuary views estate as it takes away the residential views and makes the area seem built up. Many people have moved to this area to escape medium and high rise flats.	No I actually think its great I just don't like the area of Kembla Grange having multi level flats.
Berkeley	House	Paying off a mortgag e	25 - 34 years	Male	Personally I think improving infrastructure (particularly around transport) and public transport in preparation for expected population growth is critical. I'm also in favour of higher housing density near transport hubs and restricting government housing to high density housing options (apartments, flats or Town houses).	Please don't leave transport infrastructure and off street parking behind as we grow our population.
Farmborou gh Heights	House	Paying off a mortgag e	35 - 49 years	Female	There should be affordable and social and community housing option s across the area	



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
Figtree	House	Own outright	50 - 59 years	Female	I would not like to see anymore huge high rise being built in central Wollongong. They are ugly and block the view to our beautiful escarpment. Low to medium builds should also consider how they impact the views of our gorgeous city. Infrastructure is key to allowing any development to go ahead. High rise only near the rail line. We do not need more cars on our roads along with the huge trucks.	More affordable community housing where the occupier has a stake in the building. Some sort of rent/buy scheme so the occupier can gain equity in the building and ideally have a say in its design and construction. That way they will care more for the home and actually take ownership of it. Similar schemes have been set up in Europe and shown on Grand Designs UK and are very successful. Our Young people need help to get into the housing market and schemes like these would give them a step in. Government help would be required to fund and set up these schemes but I believe it's a better use of our taxes than the federal government's current funding scheme which is only helping the developers.
Thirroul	House	Paying off a mortgag e	50 - 59 years	Female	Thirroul should not be developed for more housing The current situation in Thirroul is not sustainable. The infrastructure needs to be developed particularly the roads. It's beyond a joke!	Council should consider the current residence needs before adding more residential properties
Thirroul	House	Paying off a mortgag e	60 - 69 years	Male	I live in Thirroul and would like to see some of the older houses preserved from redevelopment.	Housing should not be just for the privileged, it's a basic right. But it should be done with some sympathy and the traffic generated should be an important consideration
Thirroul	House	Own outright	60 - 69 years	Male	Housing needs should be based on geographical area and the ability of that area to comfortable support further housing. Simply referencing projected data to support upgrades on zoning development does not consider the ability of the area to cope with the increased, in any aspect. This leads to the	The local government should approach the State government to opt out of the requirement to develop a policy on affordable housing as the policy will only bring over development, congestion and the downfall of our pristine areas. The affordable housing policy is simply a capitulation to developers and a gateway to overdevelopment.



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
					un recountable ruin of our areas, suburbs, and lifestyles.	
West Wollongon g	House	Other	18 - 24 years	Female	I am surprised to see there is no mention in this survey regarding homelessness in Wollongong. Given that homes of all types are becoming less affordable, should we not be concerned about this? I believe more thought should be given to how we may help the most underprivileged in regards to housing in Wollongong. There are many rising trends around the world which seek to make housing more affordable such as the tiny house movement, Earthship house design and the shipping container house. I believe these trends should be considered in discussions around affordable housing.	
Barrack Heights	House	Paying off a mortgag e	50 - 59 years	Female	There is an increased demand for affordable and safe housing near transport hubs ie West Wollongong, Unanderra, Figtree, Dapto. I work with women with a disability who are leaving domestic and family violence and they have very urgent need for safe medium term and long term housing that is also accessible. They often cannot afford private rental and the wait for public or social housing is too long to meet their needs after leaving crisis accommodation.	This is a good and overdue initiative that needs to be led by Council and not just left up to the market. We have tens of thousands of people in our region that find private rental accommodation unaffordable. The needs of people need to be put in front of profit by the private sector.
Balgownie	House	Paying off a mortgag e	60 - 69 years	Male	Bring back 3 storey walk up unit blocks. HOWI Insurance changes killed off the most efficient and effective means of supplying affordable housing.	The focus tends to be dominated by social housing, not surprising given the advocacy of 'The Housing Trust' and other social housing providers. There is no advocacy group for affordable housing for purchase or to increase



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
						rental stock. The NRAS disaster was caused by a policy formulated without reference to the finance industry. NRAS was unbankable, and cheap bank finance for construction and purchase is the most critical component of affordability.
Brighton	House	Own outright	50 - 59 years	Male		
Fairy Meadow	Townhou se	Renting	50 - 59 years	Female	Affordable housing should be spread out in the community not all clustered together in one block	No
Dapto	House	Paying off a mortgag e	50 - 59 years	Female	West DAPTO - What a mess, school is overcrowded, high school will be the same and estate does not compare to Calderwood. Stop taking away all the green spaces for the sake of a few dollars. Affordable options need to be included throughout more areas in the Illawarra.	Understand housing is a priority, but more for thought into establishing schools, and infrastructure etc prior to developments commencing. Option to allow for more green spaces and council taking back the land that should never have been built on ie flood zones, these are natural waterways.
North Wollongon g	Unit in a Residenti al Flat Building	Renting	50 - 59 years	Male	Around City Centre North Wollongong area should be high density	
Thirroul	House	Own outright	50 - 59 years	Male	The northern suburbs of Wollongong ie Bulli through Helensburgh, does not lend itself to higher density dwellings. constrained between the escarpment and the sea, any potential for higher density housing would have a dramatic effect on the arterial roads, traffic, heritage, environment and local character. All medium and high areas development must cease until vehicular accessibility is solved.	consideration must be given to the employment location as a priority, the Wollongong LGA has not the job potential to support current and potential housing projections. Therefore if more people reside in the area they will need to travel (via public or private transport). This area does not provide sufficient avenues for transport to greater Sydney or south to Canberra. Until the transport infrastructure needs area determined, simply increasing the general population would create transport Chaos throughout. long term solutions like the



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
						connection of the northern distributor to the F6, improvement of rail inclusive of stopping at all stations to remove traffic and parking chaos, removal of the morning "express trains". Upgrade of the rail aqueduct. filling the area with more people before looking into infrastructure sustainability will only create more problems for all residents, present and future.
Gwynnevill	Townhou	Renting	35 - 49	Female		
e	se		years			
Thirroul	House	Paying off a mortgag e	35 - 49 years	Female	I agree with Council's statement about Thirroul and infrastructure constraints in the Northern Suburbs (pg.68). The Northern Suburbs has seen a "death by one thousand cuts" through slow density increases over time, mainly through residential subdivision. This has compounded the strain on the road network, and is now a safety and emergency response hazard. The community does not want a freeway. Density is more appropriate in areas that are less constrained, have infrastructure and need urban renewal - e.g. Corrimal, Fairy Meadow, the area surrounding North Wollongong train station, Dapto and Port Kembla. Densities in Thirroul should, if anything, be DECREASED, except for the vicinity directly surrounding the train station.	Do not increase densities north of Bulli. Allow for increased supply of smaller unit housing (housing mix) in centres well serviced by train stations and arterial road links including Corrimal, Fairy Meadow, the precinct around North Wollongong Train station, Dapto and Port Kembla.
Austinmer	Dual occupanc y	Renting	25 - 34 years	Male	I would like to see clever uses of existing low- medium scale areas to allow for well- designed secondary dwellings, retrofitting large homes as dual occupancy's, and manor	Work needs to be done to ensure a genuine mix of uses is achieved within centres, especially within the CBD. This needs to be done by requiring minimum non-resi GFA.



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
					homes. There is huge potential to gain a richness of diversity of housing in these residential areas without impacting on landscaped quality, open space, and considerate design. Flexibility is key, with good and innovative design encouraged rather than stifled.	Additionally, design excellence should be recognised in not only in larger developments, but small scale redevelopment also. This should help to encourage creative, innovative and noteworthy design that doesn't necessarily comply strictly with all controls.
Woonona	House	Own outright	50 - 59 years	Female		
Austinmer	Unit in a Residenti al Flat Building	Paying off a mortgag e	60 - 69 years	Female	There is an urgent need for more social and affordable housing in the Northern suburbs.	
Figtree	House	Other	18 - 24 years	Male		
Thirroul	House	Own outright	50 - 59 years	Rather not say	The development of new housing in the northern Illawarra must be carefully considered. While there is only a one road I /out further development must not be considered. This is nothing to do with elitism it's about safety and danger as one road does not cut it. Realistically there is no room for further housing in these areas. Corrimal, Dapto and port Kembla have both good road networks and need the revitalisation	Yes whilst there is only one road past Bulli Pass these suburbs should not be considered for growth hubs
Keiraville	House	Renting	35 - 49 years	Female		
Thirroul	House	Paying off a	60 - 69 years	Female	Before any further development in the northern suburbs of Wollongong a thorough	I don't have an issue with the provision of affordable housing. However, this should not mean that the



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
		mortgag e			and comprehensive study of traffic needs to occur. This should also result in options. One could be to develop an alternative route to and from the northern suburbs. An alternative route is essential as should there be an incident, emergency vehicles need to be able to reach the incident in rapid time. This is currently not possible. Having an alternative route through the east from Bulli to Thirroul would help ease this. The northern suburbs should be excluded from any high rise development. Continuation of the current 3 storey limit is essential to maintain the village feel that visitors travel to the northern suburbs to enjoy. Thirroul needs to maintain the village feel (which is currently under threat) as it has a good stock of heritage buildings in the shopping precinct and has good views of the State heritage listed Illawarra escarpment. Council needs to ensure these are protected.	buildings lack architectural merit. Good aesthetics is important, as is liveability. The buildings need to be built with environmentally friendly materials and have good access to solar to reduce the reliance on artificial lighting and heating. I suggest checking out various housing projects built in such countries as the Nederland's and Britain as inspiration. As such developments do not always have to be high rise. I am not fond of the student housing precinct as it appears too cramped and uninviting. This is not good architecture. I would hate to see more of this across Wollongong. We can do better.



2.2 Social Media comments

The 3 Social media posts had a total reach of 23, 512 and 55,952 impressions. The posts were clicked on 1548 times and there was 219 clicks through to Council's engagement page. The comments are summarised in Tables 3 and 4.

Post 1-1/5/20



We're seeking community input on the draft Housing and Affordable Housing Options Paper until 10 July 2020. The paper provides options on increasing the number of houses and apartments that are smaller and more affordable, and we'd like community input on which options should be supported and where additional housing should be located.

Everyone can contribute, please visit https://our.wollongong.nsw.gov.au/ to give your feedback.



3,660	185	Barret Barre
People reached	Engagements	Boost Post

Table 3 – Post 1 comments

D 22

Comment	Likes	Comments on Comment	Likes
400sq mtr blocks already? how small			
do you need to go for \$400K			
Affordable Housing now that's a joke			
in Australia			
Could you do a one page 'tick & flick'	1		
please. I attempted to give my opinion			

5 comments 5 shares



but seriously, do you expect everyone to read the 121 page document?		
Wollongong doesn't need any more housing. We are full		

Post 2 - 11/6/20

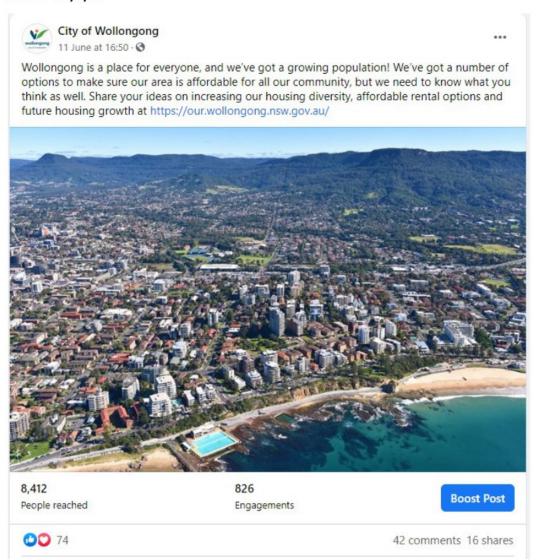


Table 4 - Post 2 comments

Comment	Likes	Comments on Comment	
Just make it easier for people to get	3		
into housing			
Improve the infrastructure before	12		
more ugly high rise.	100,000,000		



Cave houses in the side of the	8	imagine looking out at the view to a	
escarpment	"	bunch of sweaty Sublime walkers!	
Where are local jobs to match	15	,	
population growth? More people			
cramming into public transport or			
driving to Sydney is not sustainable.			
Definitely the infrastructure! How can	14	Corrimal Coke Works!!	1
you allow huge estates to be built with			
one road in and out onto one road			
that leads left or right? Ridiculous			
planning.			
		West Dapto, Gainsborough Estate,	3
		Sandon Point, Bombo Heights, Bulli	
		Heights, Woonona Heights, Stanwell	
		Tops, Darkes Forest, Farmborough	
		Heights, Rose Valley, Broughton Vale,	
		Killalea, Curramore. That's just off the	
		top of my head. Criminal.	
		I'll donate \$1000 to anyone affected by	1
		the Coke Worksif they lived in the area BEFORE the works were built	
		Stanwell Park to Bulli - what a joke!!!	
		Cannot leave our place on a weekend!	
		and you think council are responsible	
		for that?	
		welcome to Albion Park.	
		I had Calderwood in mind	
		Actually, it starts from Bald Hill. They	1
		market the northern Illawarra as a	1
		tourist destination but do not have	
		capacity to manage the result. There's	
		one road in and out which is choked	
		with tourists, there's no parking yet	
		council approved a 350 seat restaurant	
		at Clifton, they've built expensive	
		walking tracks but again no parking.	
		look at the mess at Scarborough pub!!	
		Look at the chaos at the Sea Cliff bridge	
		and the trespassers dying off the cliff.	
		council marketing is bringing more and	
		more tourists and issues (all these	
		rescues cost \$\$\$) It's not	
		sustainable, the economic benefit is	
		minimal and there is a massive impact	
		on residents whose rates are not being	
		used to service them but hordes of day trippers.	
People will want to live here if they		trippers.	
can get to work on a decent railway			
system!!!			
3,3.0.11:::		I	



to be able to afford in the north beach precinct. I think from Corrimal St at the north beach end council should allow for up to twenty five stories for apartments .the area there is so expensive at the moment in north beach area be nice to live a couple of blocks from north beach .if you allow more apartments there then property values would come down and be affordable to all to live in such a beautiful part of Wollongong .Corrimal St high rise would not affect the shadowing of the beach .more development will also provide more jobs which we lack in our city .and allow more housing up in the escarpment as well .our city needs better connectivity it's too fragmented we should invest in light rail from the top of crown St to through the mall and to the bottom and round to Cliff Rd down to the lagoon .would get more people mobile and they would leave their cars at home .the light rail would cater for workers shoppers people going to both hospitals and beach goers .with future extensions from the top of Crown St to West Wollongong Figtree, Unanderra and Dapto .future proofing our city is important .the less cars on the road the better .	2	I like the rail idea, but not the high rises. Wollongong is already getting too many blocking the views of the escarpment and losing its charm.	5
		by limiting the population, you are limiting everything else there will be no need for better infrastructure and small businesses will suffer.	
		sure, but this place is a country town that has spread. It features very few « city » characteristics. The root of the problem needs addressing: the jobless are jobless because of lack of educational opportunities, and before we blame the government for that, it starts with parents encouraging kids to make the most of every high school opportunity - this starts way before TAFE age. "Allow up to 25 stories Then property	1
		values would come down". yes, you	



		would usually find lower property	
		values in a ghetto	
		25 storeys and some people on lower	
		floors would never get any sunlight and	
		that'll be the people that you are	
		supposedly trying to help. Developers	
		would just get greedier.	
		country town maybe 50 years ago.	
		located only 1hour or so from the	
		biggest city in Australia we should be	
		taking advantage of this.	
Faster, more frequent rail system.	8	Nothing to do with council you need	1
		to lobby your state MP for that it	
		would need the track to be widened	
		from single to double in some areas or	
		else a whole new route unlikely to	
		improve any time soon sadly	
You must make sure any new			
developments of apartment not only			
fit into the area. But must see extra			
homes added. Not huge			
developments 8 storeys high with one			
owner per floor! That is not what our			
city development should be.			
Rent to buy options or dual rent/buy	9		
with Housing orgs.			
50yrs latter and Dapto on and off	2		
ramps never will be seen in our			
lifetime.			
Affordability that's a joke in Australia	1		
One of the area's biggest employers is	8		
Wollongong Uni, which is set to start			
swinging the axe on jobs because of			
COVID and massive student losses.			
The mining industry has been			
decimated and the steel works is just			
a shadow of the glory days. Public			
transport is a complete joke, and zero			
infrastructure for tourism, take a look			
at the lack of parking at WIN stadium			
for example. Wollongong council,			
completely out of touch with reality.			
Just finished watching Filthy Rich &	4	Uni students eat up all the rentals	
Homeless on SBS in which Wollongong		around the Wollongong area	
and the Illawarra featured heavily.			
There's a shortage of affordable			
housing full stop, let alone public			
housing. Then there's the lack of			
affordable rentals for people who will			
never be able to buy in the area; those			
that have and will always need to rent			

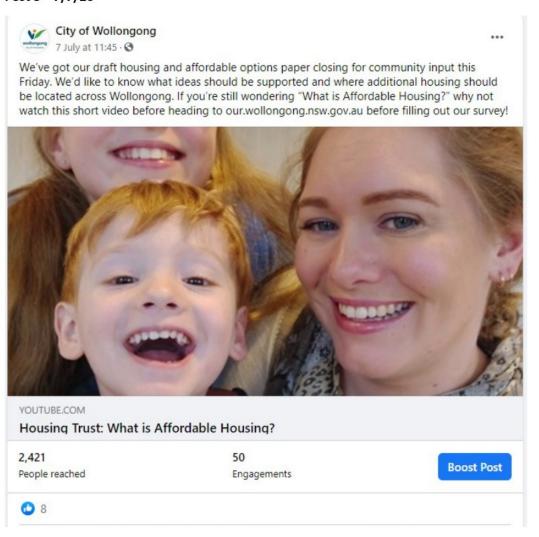


here. Rentals are fast approaching			
unaffordable levels for all but the			
highly paid. Shame nobody seems			
concerned about that!			
If you could stop developments	3		
encroaching further and further up			
the escarpment that would be great.			
The natural beauty of Wollongong is			
getting ruined from our growing			
population. Build more high rise			
residential to end the urban sprawl			
(plague) of our beautiful landscape			
here in the gong.			
Wollongong city council, in case the	3	the only traffic I've experienced is the	\neg
point hasn't been heard, the residents		bottle neck at Albion Park Rail, and the	
of Wollongong are not happy with the		Lawrence Hargrave Drive,	
congestion of our main roads,		Thirroul/Austinmer. Any other traffic	
difficulty in finding early child day		seems to clear very quickly. In regards	
care, ever shrinking Minimum		to land sizes, aren't smaller blocks	
residential land Sizes from subdivision		more affordable? Traffic lights are	
and Estate developments (eg Bulli		there to amend traffic issues, as	
brick works), the increasing growth of		inconvenient as they seem, they are a	
traffic lights, sure there is more on the		solution to traffic congestion	
list. If there was a clear plan to			
manage all of these things then maybe			
the area could accommodate more			
development happily. But start with			
some long term visions. What do you			
want the Illawarra to be, tell us, put			
out a vision statement.			
		Areas I've personally experienced	
		traffic on a regular basis are Lawrence	
		Hargrave Drive between Austinmer and	
		Bulli, memorial drive heading north	
		from Wollongong to Towradgi, the	
		highway from Albion Park to	
		Wollongong morning peak hour can be	
		hectic too. The RMS is well aware of	
		these issues and very recently opened	
		a community survey to further identify	
		trouble spots along Lawrence Hargrave	
		Drive. I don't think they have Released	
		any conclusions or plans for	
		improvement from that yet. It would	
		seem sensible to look at this as part of	
		any future planning for development.	
You can start by getting the State	1		
Government to have a 24 hour public			
transport system. Not everyone works	1		
			- 1
locally or within standard 9 to 5 hours. Stop pushing against manor housing.			



I watched a three part series on homeless people on SBS and I think that there should be a huge increase in social housing. It would be great if council could be given financial aid from the Federal Government to aid in this. All councils in Australia should receive help in this area too. It would be a way to help get the economy moving as we move through the Covid 19 situation.	1	
And the bus are every hour in Sydney their every fifteen minutes so why can't Wollongong do the same	0	٠

Post 3 - 7/7/20





2.3 Written submissions

18 written submissions were received:

- 3 from Statutory Authorities:
 - Water NSW
 - o Illawarra Shoalhaven Local Health District (2 submissions)
- 3 from Peak Groups:
 - o Urban Development Institute of Australia Illawarra
 - o Property Council of Australia Illawarra
 - o Shelter NSW
- Non-for profit Illawarra Housing Trust
- NSW Ports
- Neighbourhood Forum 5 (3 submissions)
- Heritage Solutions
- 4 from residents
- 2 on behalf of landowners seeking increased housing opportunities on specific sites.

The submissions are summarised in Table 5.

Submissions from Housing Trust, Shelter NSW and Heritage Solutions were very detailed.

Key issues raised in written submissions:



Submitter	
Shelter NSW	Shelter NSW Comments on Housing Related Issues in Wollongong Draft LSPS and Draft Wollongong Housing and Affordable Housing Options Papers.
	The following points outline Shelter NSW suggestions for Council to consider in its deliberation and implementation of its Draft Wollongong LSPS and draft Wollongong Housing and Affordable Housing Options Papers
	Purpose-built housing for younger persons with a disability
	Council has indicated a commitment to advocate for purpose-built housing for young people with a disability and to partner with local stakeholders to raise awareness of the current policy directions, and funding opportunities to develop housing that will address the unmet need. Shelter NSW sees younger people living in nursing home facilities as a major failure of the disability support system. Because of this, we recommend that the Council include in its partnership arrangements with organisations such as the Illawarra housing trust a requirement for them to deliver housing options for younger people with disabilities. Alternatively, as part of its housing funds and tender process its priorities funds being allocated to the organisation's committed to delivering homes for this target group.
	Implementing an affordable housing scheme in line with SEPP 70 (Affordable Housing Contributions Scheme) for Wollongong LGA
	Council committed to implementing an affordable housing scheme in line with SEPP 70 (Affordable Housing Contributions Scheme) for Wollongong LGA. Considering the high level of unmet need within the LGA Shelter NSW fully supports this initiative. However, to capture uplift and deliver any affordable housing, the proposed scheme has to already be outlined in Council LEP, as this is not currently the situation many major rezoning will take place before any new LEP is approved for Wollongong. To address this issue, Shelter NSW suggests that a complementary framework (planning agreements) be put in place to capture uplift and deliver affordable housing in the meantime. This framework will also allow a % of affordable housing to be acquired on major developments being determined through a gateway process. One best practice option is for Council's planning agreement policy to include a clause to provide affordable housing (See an example of Randwick Council https://www.randwick.nsw.gov.au/ data/assets/pdf file/0007/25990/Planning- Agreements-Policy.pdf or Canterbury Bankstown draft Planning Agreement Policy which includes the following clause - Provision of affordable housing where a Planning Proposal is seeking an uplift of residential floor space that exceeds 1,000 sqm of gross floor area (as defined in the applicable local environmental plan), the equivalent of at least 5 percent of the increased residential floor space should be dedicated to Council in the form of residential dwellings for affordable housing, or as a cash payment for affordable housing.



Shelter NSW suggests that Council create a planning agreement framework to capture its nominated affordable housing target for until the new LEP is in place. We suggest that the Council consider Shelter NSW recommended target of 10% of any additional uplift for affordable housing.

Shelter NSW would also suggest that Council have an affordable housing contribution rate be for both residential and non-residential land use zones. This is the case with a number of Council and one example is the City of Sydney who has the following:

Residential development

On-site: 3% of the total residential floor area must be provided as affordable housing.

Monetary: \$214.17 per square metre of the total residential floor area.

Non-residential development

On-site: 1% of the total non-residential floor area must be provided as affordable housing.

Monetary: \$71.36 per square metre of the total non-residential floor area.

Affordable rental housing target for the LGA

Council wants to implement an affordable rental housing target for Wollongong LGA, such an initiative would complement SEPP 70 Affordable Housing Contributions Scheme.

Shelter NSW suggests that the Council set a broad affordable housing target that's around 20% of all housing stock. This could then be broken down by, affordable, community, and public housing. One example of this is Sydney City Council <u>Sustainable Sydney 2030</u> which establishes the following targets by 2030, 7.5% of all housing in the local area will be social housing provided by the government and community providers, and 7.5% will be affordable housing delivered by not-for-profit or other providers.

Work with NSW Land and Housing Corporation regarding the renewal and maintenance of social housing

The report recommends that Council work with NSW Land and Housing Corporation regarding the renewal and maintenance of social housing to make better use of the land available in suburbs that have smaller older style social housing dwellings on large lots. This alights with the NSW Land and Housing Corporations Communities Plus housing model based on mixed tenure and includes private market housing through joint venture arrangements. Shelters NSW feels that although this initiative aims to deliver better housing outcomes, they often miss meeting their overall objectives and targets without strong oversight. We suggest that the Council monitor the desired outcomes, and aim to ensure that any of the community plus projects increase the proportion of public housing and that they align with



any unmet bedroom requirement in the Wollongong LGA. Shelter NSW would argue that the proportion of social housing in Wollongong LGA should be increased not just maintained.

Analyze and update data related to affordable housing

Council has undertaken to analyze and update data related to affordable housing for each census period. Shelter NSW suggests that Council also tract any affordable housing approvals as this would enable a clear understanding of what type of affordable housing is being delivered in the Wollongong LGA and would enable Council to respond proactively to the needs of its communities and any losses or increases of stock in this market segment.

Incentives to encourage diversity in housing stock across Wollongong LGA in particular more one- and two-bedroom dwellings

One recommended action to Council is to implement planning incentives and requirements to encourage diversity in housing stock across Wollongong LGA, in particular, the development of more one- and two-bedroom dwellings. This is important given that annually the addition of new dwellings represents around 1.08% of the total dwelling stock — so change occurs very slowly. Shelter NSW feels that given the current overwhelming trend by developers to build three-and four-bedrooms dwellings that strong incentives will be required to ensure a better balance of bedroom types based on need is delivered into the future.

Undertakes workshops with local developers and builders on ways to deliver more diverse housing opportunities

We recommend that Council undertake workshops with local developers and builders on ways to deliver more diverse housing opportunities linked to town centres and essential infrastructure.

Tax reform to improve housing affordability

One proposed action was for Council to advocate the NSW and Australian Government on tax reform to improve housing affordability. Both Shelter NSW and National Shelter have been advocating for tax reform to improve housing affordability outcomes for all Australians and would be happy to work with Wollongong Council on these matters.

Review the ARH SEPP 2009

One suggested action is for Council to approach the NSW Government to evaluate and review the ARH SEPP 2009 to distinguish if the Policy is delivering the intended affordable housing outcomes. The capacity of the ARH SEPP to deliver affordability has been a concern expressed by many LGA authorities. Interestingly the Manor Houses provisions in the new Medium Density Housing Code are technically based on new generation boarding houses without the strata titling restrictions of the AH SEPP. Shelter NSW has had representation from a number of our member organization on



this matter and its capacity to improve housing affordability outcomes and we would be happy to work with Council on this matter in the future.

Deliver better housing options for its aging population

Council's reports are concerned about how to deliver better housing options for its aging population. Shelter NSW suggests that Council look at ways to deliver seniors housing options in locations close to town and villages centres (taking into consideration land and environmental constraints) to close the mismatch gap between current and future supply and the needs of older residents.

Review existing residential land zones to support older residential to age in place Throughout the reports, the need for Council to review its existing residential land zones is indicated. Shelter NSW suggests that Council consider replacing Low-Density Residential Zone (R2) with General Residential (R1), especially in areas located around town centres. This would support opportunities for different housing options to be delivered and help older residential to age in place. To ensure that any new residential development is not entirely out of character with the existing, this review could sit alongside an evaluation of height controls and character assessment requirements. This recommendation from Shelter NSW is based on the capacity of the General Residential (R1) Zones to deliver more housing choice in area with good access to infrastructure and services.

Recognition that affordable housing (including public and community housing) as essential infrastructure

We would encourage Council to support the recognition that affordable housing (including public and community housing) as essential infrastructure in any future planning document (This definition is from the Australian Infrastructure Audit 2019).

Mitigate measure re loss to affordable rental accommodation to short-term visitor rental

One additional stress in the housing market in coastal location is the issue of residential housing being lost to short-term visitor rental accommodation. Council could consider investigating opportunities to mitigate these impacts by applying a cap similar to the short-term accommodation rules for greater Sydney.

Incentives to organisation or authorities that deliver affordable housing in perpetuity

That Council considers including in its local housing strategy the following incentives to organisation or authorities that deliver affordable housing in perpetuity: a fast track DA process, fee reduction or waiver, density bonus, car parking reduction bonus, waving or varying s7.11 contributions. We recommend that any exemption should be targeted at public housing or not-for-profit developers (CHPs), linked to the affordable housing being secured in



	perpetuity, not for a minimum of ten years.
	Support for Local Aboriginal Land Council to delivery additional housing opportunities
	Shelter NSW would like to see a commitment by Council to work with the Local Aboriginal Land Council on the development of a strategic plan for their landholders aimed at supporting the delivery of additional housing opportunities.
Resident Wollongong	I would like to make some comments. They are based on my experiences and my own personal values, which I would characterise as rather conservative and belief that people should be able to choose their housing, lifestyle whilst recognising the costs of those choices
	 My grandparents lived on a site approximately 2/3 of an acre at the intersection of Macquarie & Mercury Streets. They lived there for just over 50 years- 40 of which were as tenants as the housing was provided by my grandfather's employer, initially the Vickery family from about 1915-1935 and then AIS (Mt Keira mines), when he retired in about 1955 coinciding with the closure of the Mt Keira Mine Tramway, he was given the opportunity to purchase the property. It was my wish that the next generation of the family would live there but the property was rezoned resulting in its sale and the building of three units residential building with 25 units. My grandfather allowed people to use both the tennis court and gardens, including garden parties to raise funds for charity/community groups. Obviously it provided many trees consistent with the area being called Garden Hill. The area is now medium/high density area with no public park (in area bounded by south coast railway, Crown Street, Mercury Street and Tramway Drive) and very few trees. I live in a 3 bedroom unit as a tenant. It was built as there is a strong belief that 3 bedroom units are a better investment than 2 bedroom units. One of my aunts lived in her house till 2 days before her death. It was 3 bedroom 2 bathroom plus sunroom. She would not move out of her house because it had memonies of her life with her husband. The idea that older people should move out of houses to a smaller residence should not override people's choices especially older people. a. I note the push to have smaller homes – less bedrooms. But almost all surveys suggest that each child should have their own bedroom and so in many family cases, there is a need for 4 bedroom homes - I think or believe that that is what most couples with children want or believe to be appropriate for them – issue is raised in Page ii of the Executive Summary. b. The buying public should choose their preferred housing size (and style). The fac



d.	Rezoning seems to cater for the developers rather than existing residents.
e.	I reject Council's placing so much emphasis on Council's future plans for the area. Current residents and their
	preference should override the developers interest and Council's plan for the future character of the area. Having said

- a. Why is housing so expensive/
- b. How can housing affordability be achieved?

that, I believe housing is too expensive but the questions are:

I note the document shows median housing prices have increased by 84% and median unit princes have increased by 65%. I believe that in part negative gearing has led to increase in housing prices, so if negative gearing was abandoned, housing prices increases would decrease - but that is a Federal matter not Local Government.

Is this occurred then hopefully housing prices increase would decrease and housing become more affordable.

I believe that housing affordability and provision of affordable housing is a State or Federal responsibility not that of Local Government.

I would hope that housing costs or rental increases should be close to consumer price index. However page 27 suggest that rents have increased 3.5 times since 1990 with most growth occurring since 2001. Yet if at consumer price index this might mean an increase of about 1.0 times and not 3.5 times.

So again why is pricing increasing so much I might suggest:

- a. Population increase
- b. Wollongong prices following those of Sydney
- c. Higher standards and bigger units
- d. High density requiring lifts and increases strata fees
- e. Housing being seen as a great investment resulting in higher returns in the long term

With record low interest rates, hopefully housing price increases will significantly decrease.

To look at affordable housing, suggestions that a percentage of units in new buildings should be given to community housing for low income people whilst it has merits, my fear is that it will mean people buying units will have to pay more for their units and so I question this.

I believe stopping increases in housing is the only real solution, but how it can be achieved is the problem. Additionally, I believe "walk up 3 storey units" are more affordable as strata levies are increased about \$30-50 per week to cover costs of lifts and thus increases costs for renters – this is reflected in rental prices.

Finally, the Discussion Paper is so lengthy and complicated, I fear very few people will read it and make a submission.

Housing Trust

The intention and findings of the Draft Housing and Affordable Housing Options Paper (the Options Paper) are of



considerable value. Housing Trust congratulates Wollongong City Council on the release of the Options Paper and, in particular, recognising that the severe shortage of affordable rental housing is one of the greatest economic and social challenges in the Wollongong LGA.

Council has a vital role to play in the development of affordable housing. In addition to strategies such as inclusionary zoning and voluntary planning agreements (VPAs), Housing Trust encourages Council to commit to the full range of mechanisms available to Local Government to directly influence the supply of affordable housing.

Housing Trust commissioned an expert review of the Options Paper by Judith Stubbs & Associates to help inform our assessment of the strategies being proposed. That assessment includes detailed calculations of current and projected affordable rental need utilising data from the 2016 Census, Illawarra Shoalhaven Regional Plan 2016 (ISRP) and the Department of Planning Industry and Environment (DPIE) 2019 as summarised below.

Current Affordable Housing Need (households in rental stress)		
Very low income	4,942	
Low income	2,650	
Moderate income	2,040	
Total	9,633	
(JSA, 2020)		

This data differs from Council's calculation of 8,356.

The following table provides projections for additional rental stress, i.e. affordable housing need from 2016 to 2035 using two sets of dwellings assumptions.

Projected Affordable Housing Need 2016 – 2036 (households in rental stress)		
	ISRP	DPIE
	(assumes 14,600 additional dwellings)	(assumes 23,800 additional dwellings)
Very low income	860	1402
Low income	461	750



Total	1,676	2,732
Moderate income	355	579

(JSA, 2020)2

It is also important to distinguish between income groups and their housing priorities as this will impact Council's strategic planning.

The JSA report highlights material issues with Council's data selection and analysis. This has a direct impact on the overall findings and recommendations. Housing Trust has made detailed representation to Council about these issues and recommends revision prior to finalisation of the report.

The main risk to Council in not addressing these issues is:

- . Underestimation of the need and therefore a failure to implement the range and level of interventions required
- Reliance on strategies which may have little or no impact, notably diversification, and
- Inadequate focus on the needs of very low to low income households that require Local and State Government
 interventions as other income target groups may have their needs met by the market.

At the time of writing the full impact of the COVID-19 pandemic is unknown. Early indicators suggest that although there may be some short-term easing of rents in the Wollongong LGA the number of people in housing stress and therefore in need of affordable housing will increase significantly.

Housing Trust welcomes the opportunity to provide feedback on the Options Paper. A summary of key recommendations follows and specific comments are made in relation to each of the strategies.

PriorityRecommendations

Wollongong City Council can, and should, be a leader in the design and delivery of world class solutions to the affordable housing crisis.

The range of strategies proposed in Council's Paper including undertaking further reviews to passive and strong interventions all need to be assessed for their impact on each of the three household income groups: very low, low and moderate.

Housing Trust does not consider more reviews or extensive information is required before committing to a plan of action. Substantial literature, including the plans being implemented in other LGAs, is readily available. This can be used to expedite the development and adoption of precinct specific plans across Wollongong.



The strongest strategies, and therefore the ones most likely to have an impact, are those directed at;

- improving the planning system;
- creating partnerships; and
- delivering funding through the provision of land and reduced fees. Our key recommendations are outlined below:
- It is imperative that Council sets targets for affordable rental housing and this should be elevated from a Medium to
 High priority. Targets are essential to monitor progress and enable accountability. Given the nature and extent of
 housing stress in the Wollongong LGA a target of 20% of all new dwellings (between 2,092 and 4,760) is required to be
 allocated to affordable rental housing to 2036 (WCC Recommendation 4.4)
- An audit of under-utilised Council land and a 35 year leasehold or title transfer strategy should be completed by June 2021 with the land to be developed for affordable rental housing. This is likely to be one of the most effective strategies for addressing the unmet need in the area. (WCC Recommendation 3.9)

Housing Trust was established by the Illawarra Councils and operated with an MOU which facilitated collaboration and enabled the sharing of resources. Housing Trust would like an updated agreement in place by December 2020.

- Housing Trust proposes developing a process to work directly with Council on the renewal of LaHC owned land to
 ensure DCP and LEPs optimise density and improves livability and community amenity. (WCC Recommendation
 3.5)
- Housing Trust recommends automatic waving of s.94 fees for all social and affordable developments and welcomes the
 reforms to the planning and development approval processes being introduced by the NSW Government. (WCC
 Recommendation 3.5)
- Voluntary Planning Agreement (VPAs) should be maximised for their potential to make a substantial contribution to
 affordable rental housing. There is significantly more potential in VPAs such as that being considered for the Corrimal
 Coke Works development where, despite the scale of the development and rezoning, only 5% is being proposed for
 affordable rental housing. We recommend a presumption of 20% inclusionary zoning for all VPAs with site specific
 variations considered by exception. The delivery mechanisms can include 'whole lot take-out' and 'salt and peppering'
 with the early involvement of the Housing Trust able to inform and facilitate the project design and feasibility. (WCC
 Recommendation 3.4)
- Housing Trust is supportive of Council's strategy to implement an affordable contributions scheme under SEPP 70.
 This is an important contribution to the development of affordable housing for Wollongong. (WCC Recommendation 3.2)



- Due to the severity of the affordability rental crisis in Wollongong, Housing Trust recommends a SEPP 70 contributions scheme of 20%. The impact of a contributions scheme will be constrained by the availability of land with significant uplift potential and the land value. This will limit the precincts in which it is likely to be applied and therefore the amount of housing that can be produced. (WCC Recommendation 3.2)
- Appropriate and robust data is essential to underpin the strategies set out in Council's Paper. Housing Trust has made
 detailed representation on this matter, and again encourage Council to ensure its data is accurate, particularly the
 statutory benchmarks used and the distinct needs of each of the three target income groups, in order to meet the
 requirements of DPIE. (WCC Recommendation 3.1)
- Housing Trust recommends the establishment of an Affordable Housing Reference Group of Council, industry leaders, Housing Trust, and planning experts, to oversee the finalisation and implementation of the strategies with particular emphasis on revising the DCP and LEP.

DetailedResponseKeyRecommendations

Housing Trust recognises that a continuum of housing is necessary and many of the strategies below will benefit both home buyers and renters, our focus for the purpose of this review is on affordable rental.

1. Increase Housing Stock Diversity

Our findings indicate that although increasing housing stock diversity will provide benefit to moderate income earners it does little to achieve affordability for very low and low income households. By far the most serious affordable housing need in the Wollongong LGA is experienced by very low and low income renting households.

1.1 & 1.2 - Housing Trust supports an increase in housing diversity, however we note it will only improve rental affordability for smaller, moderate income households.

More than 70% of projected housing need is likely to be among very low and low income rental households. Simply increasing diversity will do little to support these households. Additional mechanisms and approaches are required and we commend Council's intention to implement SEPP 70, VPAs, identifying under- utilised government land, and affordable housing uplift and renewal of existing LaHC sites.

Council should amend the DCP and LEP controls to facilitate diversity and also vary requirements such as car parking provisions, apartment size and number of bathrooms. These controls can positively impact affordability for buyers and renters.

Council should increase the proportion of smaller units (e.g., studios) as part of developments, particularly those with



good access to transport and other services.

- 1.3 Engaging the community on the preparation of local character statements is essential and should include targeted communication with social and community housing providers and residents. Housing Trust would welcome the opportunity to work with Council to ensure effective engagement with our tenants and neighbouring residents. All place making strategies should explicitly reference affordability and how it will be achieved
- 1.4 Adaptable housing is an important element of diversity. Housing Trust supports planning controls to increase the provision of Silver Liveability Housing (at a minimum) across the LGA. Preferred locations will have good access to public transport and services.
 - Housing Trust would welcome the opportunity to provide further input into specific design principles such as dual-key apartments, floorplans, fixtures and fittings that optimise affordable liveability for tenants. Council should note LaHC is currently revising the design principles and specifications for their buildings.
- 1.5 Notwithstanding the limited merit of diversity as means of improving affordability, Housing Trust recommends Council adopts best practice to ensure well designed and located manor houses and new generation boarding houses are included in the housing mix.
 - The State Government's Low Rise Medium Density Housing Code commenced on 1 July 2020 and presents an opportunity for Council.
- 1.6- As above, Fonzie Flats provide variety in housing choice however cost and control measures will be required if this strategy is to favourably impact affordability.

2- Plan for Future Housing Growth

Housing Trust welcomes evidenced based housing growth strategies that enhance individual and community life, environmental sustainability and economic security.

- 2.1 Housing Trust would welcome the opportunity to partner with Council to ensure the needs of very low, low and moderate incomes households are considered.
 - We recommend the establishment of a Reference Group of industry leaders to advise and support Council in development of these strategies.
 - Detailed planning should only occur once Council has collated and analysed appropriate data and consulted further on its (Final) Housing and Affordable Housing Options Paper.
 - In addition to constraints and built form analyses, it is critical that growth is supported by social needs analysis to



ensure future communities have access to necessary infrastructure and services.

- 2.2 Housing Trust supports appropriately planned and managed growth in the LGA.
- 2.3 Housing Trust supports appropriately planned and managed growth in the City Centre.
- 2.4 Housing Trust strongly supports this approach. It is imperative that Council's LSPS reflects the final strategies arising from the feedback to this Options Paper so that future strategic planning responds to the housing needs and challenges facing the LGA. Housing Trust expects that the LSPS will provide further detail and guidance on a number of the critical issues raised in the Options Paper.
- 2.5 Housing Trust supports this strategy. The planning and management of employment lands is important to ensure a robust economy, with sustainable employment close to where people live.
 - Council should ensure all rezoning and uplift opportunities contribute to an increase in affordable rental housing through VPAs and/or the contribution scheme once operational. A target of 20% is required.
- 3 Increase the Supply of Affordable Housing
 - Housing Trust's own research indicates that the demand for affordable housing in the Wollongong area is growing. Around 9,650 very low, low and moderate income households are in rental stress. Just over half of the dwellings required (52%) are for smaller households and the balance suited to families with children.
- 3.1 Housing Trust supports the expedition of this Policy, in consultation with relevant stakeholders
- 3.2 Housing Trust continues to support Council's plan for an affordable housing Contribution Scheme under SEPP 70. This will make a contribution however the impact in real terms, will be limited.
 - It is imperative that the Scheme is based on appropriate and robust data. Housing Trust has made detailed representation to Council on this matter, and we again encourage Council to ensure its data, and particularly the statutory benchmarks used to establish the need for affordable housing, meets the requirements of DPIE.
 - Housing Trust notes that current areas identified for growth in the LGA are unlikely to have suitable land values and or density controls needed to optimise uplift.
- 3.3 Housing Trust congratulates Council on the partial completion of part (A) of this strategy, that is, the award of a \$4.3 grant from the \$5.2m available.
 - We recommend an immediate repeat of the 2019 EOI process to award further grant/s totalling \$5.7m to build affordable rental housing and that the target criteria for tenants be broadened.



Housing Trust agrees that home ownership is both desirable and achievable for many people. We recommend the \$400k balance of the Commonwealth funding be invested through the *Head Start Homes* program which acts as a home loan deposit guarantor for eligible

Affordable Housing tenants. In turn this also makes their affordable rental home available to another tenant.

- 3.4 Housing Trust believes this is essential to the successful implementation of a SEPP 70 Affordable Housing Contributions Scheme and Plan. We encourage Council to conduct an audit to identify sites where uplift is achievable through changes to the floor space ratios, height and other design elements such as parking and the number of bathrooms.
 - VPAs should prioritise the delivery of affordable rental housing along with the other benefits such as infrastructure, open space or heritage protection. Housing Trust asserts there is significantly more potential in recent VPAs including the Corrimal Coke Works project which contemplates only 5% affordable rental housing.
 - Involving Housing Trust in the early stages of these developments could assist feasibility due to our ability to access low-interest loans, grants and other benefits.
- 3.5 Housing Trust considers this is a high priority as it will deliver more, better quality housing and community outcomes. LaHC's (consultation draft) *Policy on CHP-led Redevelopment of Social and Affordable Housing on LaHC-owned Land* dated 5 June 2020 is commendable.
 - Housing Trust believes Council has an important role to play in the execution of this strategy by reviewing the planning controls on specific sites to allow for increases in density and fast, collaborative Development Approvals. We also recommend that Council amends their reference to social housing management in the Final paper to
 - recognise the management by Community Housing Providers such as Housing Trust.
- 3.6 Housing Trust supports this approach.
 - We recommend the establishment of a Reference Group of industry leaders, including HT, to advise and work with Council on changes to the LEP and DCP.
 - It is noted that the *Environmental Planning and Assessment Act 1979* includes provision of Affordable Housing as one of its Objects and it is appropriate that Council's planning documents reflect this.
- 3.7 Housing Trust supports this recommendation and suggests that Council undertakes an assessment of the precincts or localities where such strategies are likely to be effective due to land value uplift and seek contributions of 20% Housing Trust believes that recent VPAs such as the Corrimal Coke Works project, which only contemplates 5%



affordable rental stock, fails to maximise the rare and critical potential arising from rezoning and renewal.

3.8 Housing Trust strongly supports this strategy.

Affordable rental housing developments should automatically be exempt from s.94 fees and discounts applied on a pro rata basis according the affordable component in mixed tenure projects.

The reduction in parking requirements and other incentives can be addressed by revising the DCP and LEP regulations.

3.9 This is likely to be one of the most effective strategies for addressing the unmet affordable rental housing need in the Wollongong LGA. Housing Trust strongly supports this strategy and considers it a High priority.

We recommend Council undertake an audit to identify land that would be suitable for affordable redevelopment. Council could retain the asset and provide 35-49 year peppercorn leases to not-for-profit, Community Housing Providers like HT.

Land title transfers, as conducted by NSW Government in return for the delivery of affordable rental housing, should also be considered.

Housing Trust would like to continue our long standing partnership with Council and requests an updated MOU to reflect current objectives, community need and circumstances.

3.10 Housing Trust unequivocally offers our expertise, research and communications support to Council to achieve this strategy.

We would welcome the opportunity to be involved and can play an integral role in enhancing the social and community outcomes, design quality, liveability and financial feasibility of projects. Community Housing Providers are major contributors to the State's residential construction industry having invested \$1.2 billion in housing supply from 2012 to 2020.

3.11 Housing Trust strongly support this approach.

Housing Trust offers our expertise, research and communications support to Council and the Illawarra Shoalhaven Joint Organisation to develop and set achievable targets.

- 3.12 Housing Trust supports an evaluation and has a vital role to play in the implementation of this policy in the Wollongong LGA.
- 3.13 Housing Trust welcome's collaboration with Council on the development of innovative housing models based



on best practice and living examples.

3.14 As a long term partner of WCC we would be pleased and proud to assist Council with multi-channel communication strategies and community engagement wherever possible.

Housing Trust has provided Council with a short film supporting the need for affordable housing in the Wollongong LGA as a part of the exhibition of the Options Paper. We encourage Council to continue to use this video in the future.

4. Monitor Housing Supply

Housing Trust supports Council's intention to monitor delivery of its housing strategy. This is critical for monitoring and accountability of the strategy's implementation.

- 4.1 The Final plan needs to include targets and then monitoring progress is critical. Housing Trust is supportive of this recommendation.
- 4.2 Housing Trust supports this approach to ensure communities have access to the appropriate services.
- 4.3 We strongly recommend Council review their data sources with particular emphasis on setting defensible targets and objectively assess the impact on the strategies set out in the Options Paper.
- 4.4 Housing Trust considers it essential to have targets and that the priority for this strategy is elevated to High. We recommend the target be set at the projected (additional) affordable housing need rather than current need plus the projected increase as this would be unrealistic and limit the adoption and success of this strategy.
 Research, reported separately, indicates the total affordable rental housing dwellings needed by 2036 is between 13,450 and 15,200. This means that 20% of additional dwellings projected under the DPIE or ISRP need to be affordable.
 Without targets, monitoring and evaluation it will be impossible to estimate, in a timely manner, the extent to which any
- 4.5 Housing Trust strongly supports this recommendation. We welcome the assistance of WCC in achieving our own plans for growth in order to meet the growing demand for affordable rental housing.

5 Continuous Improvement of planning controls

of the strategies are effective.

Housing Trust recommends Council undertake detailed assessment of precincts or localities where Voluntary Planning Agreements and an Affordable Contributions Scheme are likely to be effective due to the potential for land value uplift and where variations to controls could be supported. For these schemes to be effective Council would need to undertake rezoning and major changes to controls, such as a significant increase in height where land values are



	sufficient to sustain this.
	5.1 Housing Trust looks forward to being involved in consultation activities to develop a Vision for Housing for Wollongong.
	5.2 We recommend this is considered within the scope of an Industry Reference Group.
	5.3 All such proposals represent significant opportunities to contribute to the health, wellbeing and economic outcomes of the City through the delivery of affordable purchase and rental housing.
	5.4 Housing Trust supports the streamlining, standardisation and prompt determination of development application as a means of improving community and industry confidence. We support the implementation of controls which address housing need and contribute to place making outcomes and improved amenity for all residents.
	5.5 We recommend this is considered within the scope of an Industry Reference Group.
	5.6 Housing Trust supports further investigation into the rezoning of precincts and localities where there is potential land value uplift to support the viability of an Affordable Contribution Scheme.
	5.7 Council should expand the precincts included in this review to include areas where there is likely to be more affordable housing as a result of increased density.
	5.8 Housing Trust broadly supports the review of zoning but notes the land affordability north of Thirroul limits the potential for affordable housing without an increase in density, especially in locations close to the railway stations.
UDIA	UDIA acknowledges the critical need for more market housing and affordable housing in the Wollongong local government area - one of the least affordable housing markets in Australia. We commend Wollongong City Council for addressing this issue through the Paper because Council policies play a significant role in addressing affordability.
	However, there are also other critical ways Council can address housing affordability. For example:
	- The local infrastructure contributions paid by developers under the <i>West Dapto Contributions Plan</i> are currently the highest in NSW, adding more than \$50,000 to the price of a new home.
	- The draft Wollongong City Centre Urban Design Framework proposes to prohibit residential development in some parts of the city centre, which would likely constrain apartment supply and put upward pressure on pricing.
	- Faster rezonings and DA determinations would significantly reduce the holding costs associated with residential developments, with savings reflected in the price of new homes.
	Affordable Housing Contributions Scheme



UDIA believes that applying an Affordable Housing Contributions Scheme under SEPP 70 in the Wollongong LGA (without providing additional incentives or upzoning) would increase the cost base of market housing. This would add to the pressure on housing affordability, rather than improve it.

UDIA supports an *incentive-based* approach to promote the development of Affordable Housing while also focussing on increasing supply for market housing, which will ease affordability pressures for everyone.

Where Council wants to pursue non-market objectives such as Affordable Housing, it is critical Council incentivises the market or compensates the market for the cost of these objectives. Otherwise, the contribution is simply an additional tax on a site without any commensurate increase in site value. This leaves the developer with two options:

- Pass the additional tax on to buyers of market housing
- Not proceed with development as it is unfeasible.

Therefore, it is critical where any additional costs such as providing or contributing to Affordable Housing are retrofitted they are compensated through other means. Otherwise, new home buyers are paying increased prices either through costs passed on, or insufficient new housing supply.

Recommendation 1: Council should not introduce an Affordable Housing Contributions Scheme unless it is accompanied by increased yields or other incentives in the LEP that would offset the cost of the contribution.

UDIA also notes that Affordable Housing cannot be entirely market-led, as the whole spectrum of the housing continuum cannot be delivered by the market - there also

needs to be government-led components.

The Paper has correctly identified that *uptake* of diverse housing types is one of the key issues in addressing housing affordability. UDIA believes Council controls and policies are preventing adequate uptake of:

- Multi dwelling housing
- Smaller lots
- Apartments

Multi-dwelling Housing

The Paper notes that only around 20% of R3 Medium Density zoned land in the LGA contains medium density housing types. Despite the high potential returns available to investors in this type of development, the uptake by the industry is very low.



UDIA believes that the current development controls are a major hindrance to developing medium density housing in the Wollongong LGA. Some of the main issues are:

Parking

The parking rates required for multi-dwelling housing in the Wollongong LGA are too high and do not reflect modern vehicle usage rates in metropolitan centres like Wollongong. Our initial analysis suggests additional parking spaces add approximately \$20,000 to the price of a new home. UDIA recommends Council adopt a minimum requirement of one (1) space per dwelling for multi-unit housing. This is the rate adopted in other areas of NSW with similar development rates, including Campbelltown and Newcastle.

We also encourage Council to accept zero parking provision based on a case-by-case merit assessment in some areas of Wollongong with high levels of accessibility and public transport access.

Recommendation 2: Council should change the parking requirement for multi-dwelling housing to a minimum of one space per dwelling (regardless of size), with no parking required in some well-serviced and accessible locations based on merit.

Minimum Lot Widths

The current requirement of 18 metre minimum lot width for multi-dwelling housing is stopping many lots in the Wollongong LGA from being eligible for this housing type. Many lots were subdivided based on a 50- foot (15.24 metre) historic standard. UDIA notes that a 15 metre minimum lot width has been successfully applied to multi-dwelling housing in other jurisdictions, such as the Brisbane City Council Dwelling Code. 15 metres allows a front dwelling entry and garage (or two dwelling entrances without front garages) plus driveway and side setback/landscaping. Retaining the existing setback requirements in the DCP would ensure amenity is maintained.

Recommendation 3: Council should change the minimum lot width for multi-dwelling housing to 15 metres.

Tree Retention

Our understanding is that Council's interpretation of vegetation management and tree retention requirements in the Wollongong DCP is inconsistent between development applications. We encourage Council to clarify its interpretation of these policies in the context of multi-dwelling housing. If Council is to encourage medium density housing, it must acknowledge that trees that were planted in a low-density residential context may no longer be appropriate for the desired future medium density character.

Recommendation 4: Council should clarify its approach to tree retention in neighbourhoods it wishes to see transition from low density residential to medium density residential.



UDIA notes that these are just some of the issues with the detailed development controls for medium density housing in Wollongong. We are very keen to work with Council on addressing these issues in more detail to ensure that medium density development has high amenity and is also feasible to deliver.

Smaller Lots

UDIA acknowledges that minimum lot sizes of 300m2 have been supported in some greenfield areas. However, the predominant minimum lot size across greenfield areas in Wollongong continues to be 450m2. This is significantly higher than the minimum lot sizes in Sydney's Growth Centres. As a general rule, each additional square metre adds \$1000 to the price of a lot, so any further reduction in the minimum lot size would improve affordability.

Small lot housing is also desirable for downsizers looking for low maintenance and high accessibility. As the Wollongong population ages, there will be more demand for small lot single storey housing. By encouraging downsizing, Council would also encourage the release of existing larger housing stock for redevelopment into a more diverse range of housing.

Recommendation 5: Council should steadily reduce the average lot size across greenfield areas of Wollongong over time to reflect changing market demand and affordability.

It is also important that Council ensures its minimum lot size requirements align with the Low Rise Housing Diversity Code and Greenfield Housing Code to allow as many homes as possible to be built through the complying development process. The significant reductions in time and increase in investment certainty from the CDC process would reduce the cost of a new home and increase supply.

Apartments

The Paper notes that affordability can be addressed in part by a diverse supply of housing, including apartments. Wollongong has undergone a recent boom in apartment supply, however this has occurred to address unmet existing demand rather than speculative new supply. There will continue to be strong demand for apartments and encouraging further supply will help to ensure they are affordable.

UDIA has made a detailed submission on the Wollongong City Centre Urban Design Framework. We support some of the proposed changes such as the removal of the ground floor commercial/retail requirement for apartment buildings. However, we do not support commercial-only precincts or further restrictions and design requirements for apartments.

In addition, UDIA believes the Paper should address several issues with apartment supply in Wollongong, including:

- Application of the Apartment Design Guide
- Basement parking requirements



	- Minimum lot widths
	Application of the Apartment Design Guide
	The Apartment Design Guide is a guidance document to support SEPP 65 developments. UDIA is concerned that it is being applied too rigidly across NSW, including in Wollongong. We note the Minister for Planning is currently reviewing the ADG as well as other design guidance and we encourage Council to apply the ADG as a guidance document with discretion to support good design outcomes.
	Recommendation 6: Council should apply the Apartment Design Guide with discretion to support good design outcomes.
	Basement parking
	Many areas of the Wollongong City Centre have geological conditions that make the provision of basement parking levels difficult and expensive. UDIA members report that in some cases Council has not supported alternatives to basement parking to address this issue. UDIA encourages Council to support alternative approaches to parking including above ground parking levels, off-site parking provision, or contributions to public parking provision in lieu of parking within the development.
	Recommendation 7: Council should support alternative approaches to parking for residential flat buildings other than basement parking.
	The current requirement of 24 metre minimum lot width for residential flat buildings is stopping many sites in the Wollongong LGA from being eligible for this housing type. UDIA notes that a 20 metre minimum lot width has been successfully applied to residential flat buildings in other jurisdictions, such as the Brisbane City Council Dwelling Code. Retaining the existing setback requirements in the DCP would ensure amenity is maintained.
	Recommendation 8: Council should change the minimum lot width for residential flat buildings to 20 metres.
WaterNSW	Almost half of the LGA (in the west) falls within the Sydney Drinking Catchment (SDWC). Most of this land forms part of the Woronora and Metropolitan Special Areas (inner catchment areas), which are managed to protect the water quality of key reservoirs. Most, but not all, of this land is owned and managed by Water NSW or in National Park estate. The Special Areas are designated Schedule 1 land under the <i>Water NSW Act 2014</i> and Regulation 2013 where public access is prohibited.
	WaterNSW has responsibilities for protecting water quality in the SDWC through planning instruments such as the Section 9.1 Direction 5.2 Sydney Drinking Water Catchment and State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011 (the SEPP). The latter requires all new development in the SDWC to have a neutral or beneficial effect on water quality.
	The SEPP applies to private land within the LGA that lies within the SDWC, this being mainly limited to areas in Darkes Forest and a small area of land in the west of Maddens Plains. The private land areas of Darkes Forest and Maddens Plains that lie



within the SDWC are mostly zoned E3 Environmental Management. These lands are also designated 'Special Area' although environmental controls are limited for private land.

We note that Darkes Forest and Maddens Plains are not specifically mentioned in the Options Paper. Similarly, the Options Paper does not directly mention semi-rural or rural residential development. The Options Paper would benefit by clearly indicating that it is not addressing rural residential development or its intensification, or otherwise explain that rural residential development is beyond the scope of the Paper (if this is the case). WaterNSW is generally not supportive of development intensification (such as housing) on Special Area Schedule 1 private lands.

The Options Paper would benefit by mentioning that the western half of the LGA is designated Special Area within the SDWC, occurring largely within land owned and managed by WaterNSW or as National Park estate. These lands are therefore unsuitable for housing.

We support the Options Paper's consideration of watercourses, riparian lands, wetlands, flood-prone lands and steep slopes as environmental constraints to current and future housing, and the importance of riparian land for water quality protection (pp. 53-54). We also note that the paper addresses water and sewer reticulation on page 69. We note and support the Paper's recognition that the Illawarra is supplied by WaterNSW's Avon Dam. This section would benefit by identifying which areas of the LGA are sewered and which are not, and including a corresponding map for the LGA. This would help identify where sewerage infrastructure, or lack thereof, acts as a constraint for future housing expansion.

The Options Paper may benefit by providing greater recognition of stormwater management and water sensitive urban design initiatives to promote water re-use, retention, and reduce localised flooding impacts and risk. This would include recognising the need to counterbalance housing demand with urban designs that promote permeable surfaces, open space, tree canopy cover and other initiatives for urban cooling and retaining water in the landscape. In this sense any draft Housing Strategy derived from the Options Paper would benefit by giving consideration to sustainability and environmental outcomes in concert with increasing housing options and affordability.

Property Council of Australia

The Property Council supports the initiative by Wollongong City Council to develop an options paper which invites feedback from stakeholders and will input into a more detailed housing strategy to address the housing needs for the Wollongong local government area.

Ensuring that we have the right mix of housing available to people who live in our local communities is vital, and the whole industry has a role to play in achieving this. We encourage council to continue working collaboratively with the industry to develop and implement the housing strategy and our members look forward to being part of this process.

Overview



We appreciate the opportunity to provide feedback and input into this options paper and support many of the priorities identified and look forward to continuing our work with council in ensuring we have the right policy and planning tools available to deliver affordable housing in our local communities. Overall, the whole industry has a role to play in achieving these goals and it is important that council continue to work collaboratively with the industry to develop and implement the housing strategy.

Overall, there are a few factors we believe do need to be addressed in the development of the housing strategy and these include:

- The paper appropriately recognises the greatest need is for affordable rental housing and the strategies need to clearly target these groups from those seeking affordable purchase.
- It is important to distinguish between the capability of the private market providers and the affordable housing providers (Government and Community Housing Providers. These groups have different needs and outcomes, and we have considered both groups in our response to your recommendations below).
- Housing need varies considerably across the three Affordable Housing Income groups very low, low and moderate. The
 impact of the strategies, and role of the market and other providers, should reflect these differences.
- We have some concerns around the data used and presented within this report, the data is outdated and four years old and with concrete data sources lacking to support some of the statements made within this paper. We would encourage council to update and correct their data sources and ensuring that any options considered are supported with an evidence base.
- Data around property values and income levels should also be considered more closely in the development of the housing strategy and identifying appropriate actions. In the Wollongong LGA, we have high property values and lower income levels compared to Sydney for example and this also needs to be examined.
- There are various overarching statements within the paper, and we encourage council to provide more specific precinct-based responses and priorities for housing for different areas. With the Wollongong LGA covering such a large geographical area, with very different needs across various suburbs from north to south, local centres and precincts it is important to be specific on the actions outlined.

1. Increasing Housing Stock Diversity

Property Council is generally supportive of the priorities and recommendations outlined within these recommendations. We believe these actions may contribute to addressing the issue for some households, but it is important to note that it won't



necessarily 'solve' the issue. However, taking practical steps to allow more flexibility and adaptability through the Wollongong DCP with a particular focus on growth around town and village centres as outlined in the options paper is vital. Investigating options to increase the proportion of new dwellings and smaller more affordable product for purchase is a step in the right direction, this is important for infill areas but also in relation to greenfield areas where there is a lack of smaller stock. The availability of housing such as manor houses and fonzie flats will contribute to increasing the housing diversity stock and we commend council on their willingness to explore this further and recognising the benefits of this type of housing within local communities.

Smaller, more affordable product not only assists with purchase but also in providing further options for rental – with more students living in the city, more flexible and adaptable housing would be beneficial. However, this is beneficial not only to address the needs of students, there are all types of people who would benefit from access to other types of housing such as fonzie flats as it provides another housing alternative compared to a single dwelling, apartment or other type of housing option.

It is important to note that increasing the diversity of housing stock will not, on its own, make the housing more affordable for renters. Other interventions including the allocation for government land and collaboration with LAHC and community housing providers to renew and increase the density of their existing stock is essential.

This discussion is also relevant for our seniors. As the population changes and as we plan for our ageing population we need to ensure there is a wide choice of housing options available and designed to meet the specific needs of older people in our local communities. For example, new and/or refurbished homes for seniors designed to facilitate a range of aged care support services provided to people in their own homes. This may include smaller and fully accessible dwellings at ground level close to services and town centres as identified within the paper. With supply very limited in this space, council should investigate how its planning controls can be amended to provide more flexibility and opportunities suitable for seniors housing and in-home services, particularly when the Commonwealth Government is promoting and increasing funding to ageing in place via home care services and packages.

The delivery of housing stock at a smaller size with more flexibility and at a more affordable point of purchase is important, but this does not come without its challenges, especially if there isn't support for this type of housing in the DCP. A DCP review is essential and we encourage council to undertake a review together with industry, to consider feasibility of these options and gain feedback from the industry before making decisions about how the planning controls are set out in the DCP.

Council has an important role in considering feasibility as part of their planning process and should take accountability together with industry to ensure that these housing options work and are supported.



It would be great to initiate a taskforce with council, community housing providers, the development industry and other expert practitioners to look at this holistically and work together collaboratively to consider the things that aren't working, what needs to change, set targets and trial solutions. We strongly recommend council consider practical steps such as this to bring positive change and ultimately achieve the priorities and actions as outlined in this paper.

2. Plan for Future Growth

Property Council is generally supportive of the priorities and associated actions outline with regards to planning for future housing growth. We agree with the need to define urban growth areas and precincts across the region and consider how these areas can support growth and increased density.

It is important to note that since the release of this paper, the NSW Government has implemented the Low Rise Medium Density Housing Code from 1 July which means council should be looking at how it can encourage this type of development through its updated planning controls. The code acts as a strong tool to reduce the number of applications coming to council and fast-tracking dwellings in the 'missing middle', producing a number of benefits within the community. This is a good opportunity for council to allocate any additional resources to larger projects which bring investment, jobs and economic development.

The council has taken an approach that complying development and the now called 'low-rise housing diversity code' will be an issue across the LGA, but there has not been any key actions implemented by council in the LEPs to address this. We understand that further change may come out of this process, and some of the recommendations around the R3 zone might be appropriate. More work needs to be done to encourage this type of housing in certain areas.

It is also important to note that it will take some time for the development industry to transition to the code and we expect the rate of take up to be gradual, with strict design controls and criteria in place to ensure developments meet requirements. This type of housing fills a gap in which can be beneficial for the community and provide diverse housing stock especially in areas identified as growth areas.

3. Increase Supply of Affordable Rental Housing

Property Council commends council for recognising this very important issue and outlining a number of priorities to address this challenge, and we are supportive of the actions identified.

From a Property Council perspective, we reserve our position on any proposal to implement a scheme under SEPP 70 until we see more detail as to how this will play out and there should be consultation with the industry as this progresses, as viability will be an issue so we look forward to further work in this space.



We would also encourage a partnership between council and local community housing organisations to help lead the response in addressing these issues, to agree on targets and identify the most feasible options as already outlined above. There are a range of factors to consider when developing an Affordable Housing Policy and working with well-established organisations who are already embedded in the community and understand the needs within this sector will be invaluable in your efforts to tackle this increasing challenge.

We also encourage council to distinguish the difference between very low to low income housing (including social housing) and moderate income housing within the strategy, with the two groups having very different needs within our community. This is also important when facilitating opportunities for developments and building community support around affordable housing.

It is also very important to be clear in the housing strategy about which particular sector council is targeting as part of your efforts to increase the supply of affordable rental housing. There are different strategies applicable to the two groups and this needs to be distinguished. Specific targets also need to be developed to achieve the goals of the strategies, for eg. you may look at higher targets in certain precincts compared to others.

Overall, we encourage council to continue exploring these options further and working closely with community housing partners to develop and implement evidenced based strategies.

4. Monitor Housing Supply

The Property Council generally supports the actions identified and encourage a formal review of the housing strategy to be set up within specific timeframes, to ensure that progress is being tracked, and the strategy is being amended accordingly to set concrete targets. It is also important that detailed evidence and monitoring is supplied and considered when reviewing the strategy and assessing targets.

5. Continuous Improvement of Planning Controls

The Property Council is generally supportive of the actions identified and recommends a strategic, collaborative and productive approach for the housing strategy which is done in consultation with the industry and the community. This approach will ensure that all things are considered when implementing continuous improvements to planning controls setting concrete targets that are feasible, practical goals and actions and ensuring approvals are effective and efficient. We look forward to continuing working with council as the development and implementation of this strategy progresses.

Resident Thirroul

I support the inclusion of housing mix in higher density developments that are located in **well serviced centres**, with the outcome of enabling demographic mix in cities, minimise displacement, access to facilities and services, and ageing in place.



However, the basis for my comments are heavily effected by the fact that I am a longstanding resident of an area that has continued to experience increased infill development despite being geographically constrained in its ability to respond with appropriate infrastructure.

I do not support any increase in densities anywhere north of Point Street, Bulli. Ideally, I would request a down zoning, and removal of the ability for landowners to subdivide, and a reduction in the minimum lot size, but realise the limitations of the ability for Council to do this under the existing state planning system.

The northern suburbs are in crisis. Decades of infill development has gradually eroded the liveability and accessibility for both residents and visitors. The traffic network is already failing with limited capacity to deal with every day traffic flows let alone traffic in peak periods, holiday periods or at times of emergencies. Residents are no longer able to access everyday services due to the complete gridlock on our road network especially on weekends. This will only worsen with increased residential development in greenfield areas to our west, outside of our LGA – there is no doubt the 40,000 new residents at Wilton will want to spend hot Saturdays in summer at Austinmer beach.

I do not support Thirroul being identified in the Illawarra Regional Strategy as a centre for increased housing activity. Until a solution for the traffic congestion is realised, the timing of this is inappropriate. There are other centres within the LGA which would benefit with increased densities and the benefits of increased passive surveillance, increased night time activities, revitalisation and gentrification – Corrimal, the precinct surrounding North Wollongong train station, Port Kembla Fairy Meadow, Dapto – these centres are well serviced with multiple roads and a train station.

Furthermore, Thirroul's role as the gateway to the northern suburbs and as a tourist destination, in my opinion, warrants further protection from increased density to maintain its village lifestyle appeal.

My comments specifically with regard to the Options paper are:

- I agree with Council's statement about Thirroul and infrastructure constraints in the Northern Suburbs (pg.68). The
 Northern Suburbs has seen a "death by one thousand cuts" through slow density increases over time, mainly through
 residential subdivision. This has compounded the strain on the road network, and is now a safety and emergency response
 hazard. The community does not want a freeway. Density is more appropriate in other areas that are less constrained, have
 infrastructure and would benefit from urban renewal.
- I support action 5.8 (pg. 102) to limit housing densities north of Thirroul
- Although not suggested in the document, I support a reduction in the minimum lot size in properties north of Thirroul.



Resident Corrimal	A) affordable and social housing need to have security of tenancy. Not having this adds extra stress to the tenants of any privately rented home, as having to move often is costly and very disruptive to life.	
	B) no private landlords, but a Housing Corporation managing these homes or an organisation like Housing Trust.	
	C) better options such as studios, one and two bedroom homes or apartments, with balconies, for smaller households.	
	At all times, avoid building ugly tower blocks without balconies (such as are in the news in Melbourne at the moment, during the COVID crisis. To be in lockdown in your home, without at least a balcony to escape on during a pandemic, is an absolute nightmare).	
	D). These homes need to be close to public transport and schools as the tenants invariably do not own a car, but still need to get to work, school and shops. And then they should not be on steep hills, as this also will trap a tenant without a car or with a disability, from participating in society.	
	E) housing should be affordable for everyone and there should be enough houses for every person in our city. It is quite a disgrace for our wealthy society/country that we have people living on the street or in cars.	
	F) perhaps increase our rates, so more houses can be build.	
	G) Let us make Wollongong Australia's first city with enough homes for everyone, without housing stress, housing waiting lists, And homeless people. How proud will we be!	
Illawarra Shoalhaven Local Health District	Promoting, protecting and maintaining health are key goals of the Illawarra Shoalhaven Local Health District (ISLHD). Housing is fundamental to human health. It affects many aspects of life, including personal and family wellbeing, mental and physical health, employment opportunities, social connectedness and environmental sustainability. Limited housing options can mean lower levels of social and economic participation and less access to healthcare and healthy environments.	
	There is evidence and leading practice that identifies key issues that should be addressed in regards to housing and health. These are summarised in the attached appendix and provide context in reviewing ISLHD recommendations.	
	The Draft Housing and Affordable Housing Options paper provides a unique opportunity to interpret the health aspirations of the community through effective housing strategies.	
	ISLHD commends Wollongong Council on its comprehensive options paper which articulates well the current	



housing situation and provides relevant and accessible information as to community needs.

ISLHD endorses the following elements of the options paper:

- Tackling affordable housing at a strategic level and identification of key planning priorities of increasing housing stock diversity, preparation for future housing growth and augmenting the supply of affordable rental housing.
- Utilisation of the NSW Government 'Local Housing Strategy Guideline' and progress toward meeting the recommendations charted in the relevant Local Housing Strategy Standard outline.
- Robust engagement of the community in developing a draft 'Vision for Housing'.
- Goal to ensure a diversity of housing by type, size and price points to respond to the variety of housing residents need with growth and change of population.
- Provision for providing suitable and adequate housing for people with limited mobility including Residential Aged
 Care, Seniors Independent Living, Liveable Housing
- Recommendation to adopt and implement an affordable rental housing target for Wollongong LGA in response to a large and growing issue of housing affordability and affordable housing.
- Acknowledgment that homelessness is a significant issue with a doubling of homeless population since 2011.
- Proposal to increase the supply of adaptable housing stock and increase the number of studio, 1 and 2 bedroom dwellings.
- Preparation of development controls in relation to new forms of housing that diversify housing stock e.g. Fonzie flats.
- Defining areas for urban growth around medium density residential zoned land, requiring adequate infrastructure and response to land and environmental constraints.
- Aim to investigate and then integrate planning and policy principles to promote development and protection of affordable rental housing into Council's LEP and DCP.
- Continuing to develop and implement an Affordable Housing Contribution Scheme for Wollongong LGA under SEPP 70.
- Realise partnerships that deliver affordable rental housing i.e. Community Housing Providers and the NSW Land and Housing Corporation
- Review of permissibility for residential housing types across R2 Low Density, R3 Medium Density, R1 General Residential, and business zoned land.



The Illawarra Shoalhaven Local Health District recommends the following be considered for inclusion in Draft Housing and Affordable Housing Options paper:

- Strengthen references to housing and health and the vital role it plays in the health of vulnerable communities.
 ISLHD would be happy to provide evidence to support this.
- Address planning priorities by undertaking further study of the needs for Aboriginal housing, housing for CALD
 communities and disability accommodation. Information and analysis of the needs of these groups would support
 the priorities.
- Clearly identify the partners council will work with to support affordable housing or access to housing. As no one sector is able to solve the housing affordability issue, government, builders and developers should aim to work together across the social, affordable and market housing sectors. This is especially for providers who work with the vulnerable populations identified in paper e.g. people living with disabilities, youth who are homeless.
- Advance tangible strategies in partnership with social hosing providers and developers to respond to the
 emerging gap between household size and dwelling size. A central strategy would be the need for an
 increase in development of one, two and three bedroom size housing stock.
- Actively work with NSW Land and Housing to renew and retrofit social housing and make the best use of existing stock/land. The NSW Land and Housing Corporation are administering the Communities Plus program focused on renewing the NSW Government's social housing portfolio to produce mixed tenure development. This would respond to the large and growing gap between the number of low-income households and private rental housing that is affordable.
- Allocate resources to investigate practical options for renewing Social Housing in Wollongong LGA and work with NSW Land and Housing Corporation to action these.
- Investigate the appropriate proportion of either adaptable or liveable housing stock required into the future so as to provide a realistic affordable rental housing target.
- Raise awareness with key partners as to the need to develop specialist housing. The Specialist Disability Accommodation market is emerging and will over the next few years create new dwellings for people with disability. The Specialist Disability Accommodation in Australia Report (March 2019) found a shortfall in specialist disability accommodation in the Illawarra of 93 places.
- Investigate ways to build in flexibility in council processes and guidelines to incentivise the provision of more housing choice (particularly 1 and 2 bedroom homes) and make it easier for builders and developers



	to do things differently (e.g. floor space ratios and car parking requirements). It is important to make sure that these deliver good design outcomes and more housing choice. Council work to develop strategies to address energy efficiency for low-income households. A barrier is the gap in relevant and accessible information about the costs and benefits of upgrades to the home. Commit to work with partners to secure funding to retro fit existing stock and maintain housing hardware especially in relation to energy and water efficiency. No single retrofit is suitable for application across all homes and retrofits should include installation of items such as solar hot water systems, door seals, working windows, ceiling fans, insulation. Ensure through approvals that affordable housing is within a reasonable walking distance (around 400 to 500 metres) of shops, schools, public transport hubs, employment and other important community services and destinations to prevent car dependency. People on low incomes often do not own a car and/or struggle to run a car. Maintain new affordable housing to demonstrate best practice design so as to be indistinguishable from other forms of housing and distributed throughout area/development instead of being concentrated in an identifiable cluster. Work to include 'Greener Places' Premiers priority targets of access to open space and tree canopy when considering new housing stock locations. Make sure well designed and appropriately located built and natural shade is planned for and budgeted appropriately in upgrades of existing housing stock and in plans for new stock especially for affordable housing. Support investment in quality public spaces and amenities upfront (meeting places, parks, walkways, cycleways) to support more density and more housing choice. This encourages people to recognise that having a smaller home does not compromise quality of life. Ensure higher density affordable housing facilities and spaces are designed to support an increase in the frequency and
Illawarra Shoalhaven Local Health District	Illawarra Shoalhaven Local Health District (ISLHD) appreciates the opportunity to comment on the options paper, with particular reference to its impact on Wollongong Hospital and surrounding areas.
	We note in section 5.4.2 - SP1 Wollongong Hospital Precinct Zone that the recommendation of the Options Paper is to review the current SP1 zoning, with a view to introducing residential zoning to guide development of properties further away from the hospital. We also note the absence of specific objectives relating to the Hospital Precinct in the current Local Environment Plan.



Health Precinct

Wollongong Public Hospital is the major tertiary referral centre for the Illawarra Shoalhaven region, and provides the community with major employment and education opportunities. It is expected that demand for health services in the Illawarra Shoalhaven region will continue to increase into the future, driven by a growing and ageing population, and Wollongong Hospital will require significant expansion to accommodate this demand.

The Illawarra Shoalhaven Local Health District has been a participant in the Department of Planning, Industry and Environment's commissioned Metro Wollongong Precinct study. The concept of expanding a Health Precinct on the existing public and private hospital campuses and along Crown Street is supported by the study, capitalising on the existing significant investment in health infrastructure. As the anchor of the Health Precinct, the future expansion of Wollongong Hospital will play a key role in the realisation of the precinct concept.

The Health Precinct also provides opportunities for further collaboration between Wollongong Hospital, the University of Wollongong and the Illawarra Health and Medical Research Institute, to provide the region with the necessary skilled and trained health professionals for the future.

Zonal Master Plan

In 2013, the District commissioned a Strategic Zonal Master Plan to provide a high-level framework to inform future opportunities, and develop a number of options to ensure the Wollongong Hospital campus can respond to current and future needs.

The current site has very little un-built land and is bound by main roads and residential streets. This makes the hospital expansion zones quite challenging, and requires careful planning to ensure zoning of land supports the strategic aims of the Health Precinct and the hospital's ability to meet demand into the future.

We request that the Council includes the District in conversations about potential rezoning of lands surrounding the hospital, particularly Loftus street, New Dapto Road, Dudley Street and Darling Street.

We would also like to express our interest in meeting with the relevant representatives from the Council to share the findings from the Strategic Zonal Master Plan.

Heritage Solutions

This submission broadly addresses issues raised in Item 2 of the Ordinary Meeting of Council held on 16 March 2020 (Public Exhibition of Draft Housing and Affordable Housing Options Paper), commencing with Council Officer's



comments on the 'Low Rise Medium Density Code' and then offering some alternative solutions.

7.0 COUNCIL'S PAPER: HERITAGE SOLUTIONS' COMMENTS

7.1 Medium Density Alternatives

Although this has been, as noted, an ongoing concern for some 15 years, there have been little or no results 'on the ground' to date.

The fuller introduction of the 'Low Rise Medium Density Code', known colloquially as the 'Missing Middle', appears to have stimulated the present study.

7.2 Low Rise Medium Density Code or 'Missing Middle'

Council's stated concerns are as follows:

a. 'It will allow private certifiers to assess complex development types (dual occupancies, manor homes and terrace houses)'

Comment:

- Council certifiers (who predominate numerically 4:1 in the Illawarra) will also be able to assess and approve these developments.
- These are no more 'complex' than a single dwelling and granny flat, i.e. there are the same B.C.A. requirements in both cases.
- b. 'There will be no neighbourhood notification or consultation (except just prior to consultation).'
 Comment:
 - The need to notify potentially affected landowners arose from the L.E.C. Commissioner's findings in 'Porter vs. Hornsby Shire Council (1988)' where it was held to be reasonable that potentially affected landowners be <u>notified</u> by Council and their comments (if any) <u>considered</u>. (note: There is no reference to a statuary 'consultation' requirement (as mentioned in this report) in the Environmental Planning and Assessment Act.)

'To consult' is defined as 'to seek the opinion or advice of another, to take counsel.'

This is a different meaning that 'to consider' which is defined as 'to think carefully about <something> typically before making a decision.'



'Take into account any objections and comments' is also referred to in the Council document. See the guidelines from Inner West Council in appendices.

- The community's responses are rarely positive (e.g. Council's notice to neighbours was, for a time, referred to as 'Objection letter' and unpopular planning decisions are often blamed by Council on residents for not objecting.)
- As a result, planning approvals by Council Officers or Planning Panels rarely have community support, so that as a marketing exercise 'consultation' is not particularly successful.
- Does 'community consultation' actually change the nature of an approval?
 While additional information may be sought, if the application is fully compliant, then it is likely to be approved unchanged, or with minimal changes that may or may not actually address the concerns raised, and may or may not improve the quality of the application.

Summary: While community consultation is seen as beneficial, it slows down the approval process and at best provides a compromise, not required under the planning legislation and at worst benefits neither party, nor Council's community standing.

Increased 'community consultation' began at approximately the same time as the introduction of Exempt and Complying Development.

In our view, this was a deliberate and popularist attempt by Councils to differentiate between the D.A. and complying approval pathways.

- c. 'Council is meeting its housing targets.'
 Comment:
 - What does this mean?
 - How is it measured?
 - Why is there a shortage of affordable housing if this is correct?
- **d.** 'The environmental constraints (steep slopes, flooding and bush fire risk) of the L.G.A. mean a code assessment is no appropriate.'

Comment:



- This statement seems to assume that 'Missing Middle' development will occur in these areas, generally on the fringe of the L.G.A.
- The intention of 'Missing Middle' development is to include small pockets of medium density development into existing suburban streetscapes, as part of a 'turnover' of property types. This is more likely to happen in older 'core' areas of the city and suburbs where there are older small dwellings on larger lots i.e. where the dwelling's value is less significant than the land value. This is less likely in newer areas where these noted constraints may apply.
- Complying development is permissible in both bushfire and flood affected areas, depending on the Council or R.F.B.'s assessment of risk and the provision of a consultant's report.
- Steep slopes are only problematic if geotechnical issues are involved.
- e. 'Is not consistent with the local or desired future character of many suburbs.'

Comment:

- a. Wollongong City Council have prepared:
- i. Character Statements (DCP, From North to South order)
- Locality Based Plans for areas ranging from a precinct to a suburb, also including character statements.

Comment:

- These separate documents should be edited together.
- Chapter D1 should be relocated to the first chapter in the DCP (rather than the fourth) to reinforce its importance at an early stage.
- Reference to it should be made throughout the remainder of the document.
- Aims and objectives

This statement is clear.

2. What is Character?



- Existing Character: This is a technical definition that provides little guidance to the reader. This concept is more fully explored in the third paragraph, however, to be accessible to all readers, fewer technical terms and a point format should be used. Each referenced characteristic needs to be better described, possibly with illustrations. This information is critical to an applicant understanding the importance of context.
 Reference to the SEPP 65 Apartment Design Guide and its forerunner, the Residential Flat Design Code should be made and adopted by Council in this section; see
- 1. Apartment Design Guide Part 1: 'Identifying the Context', parts 1B Local Character and Context 1C Precincts and Individual Sites
- 2. Residential Flat Design Code; a), part 01 Local Context

In both documents analysis of local character is designed to inform the selection of primary planning controls for the specific site.

In reality, this analysis, (if any) is carried out by the designer, post design phase as a justification., and by the planning/assessment staff not at all.

The initial pre-lodgement meeting should address these issues almost exclusively.

b) Site Design:

The R.F.D.C. required that 'A written statement explaining how the design of the proposed development has responded to the site analysis must accompany the development application.'

Although this practice is more honoured in the breach than the observance, it is a better defined process that is set in the W.C.C.

D.C.P. and consideration should be given to its conclusion.

Drawing both applicant's and assessing officer's attention to this requirement will result in more appropriate precinct specific solutions, which will be a point of difference to the 'Missing Middle' code and provide a more positive response from neighbours for a more familiar proposal in the street.

7.3 Comments on the Paper's Executive Summary

This Housing and Affordable Housing Options Paper has been prepared to inform the development of a new Housing Strategy for Wollongong L.G.A. The purpose of this Paper is to present the key issues and planning priorities for housing,



as well as options and key recommendations moving forward. Key findings and recommendations from this Paper will be used to engage the community, to inform development of a new Housing Strategy for Wollongong L.G.A.

The Wollongong L.G.A has enough theoretical capacity under existing planning controls to deliver the amount of housing required to meet future housing projections over the next 20 years.

However, there are some key issues for housing to address that relate to:

Performance of Land Use Zones:

 There is little difference between the type of housing that is being developed in the low and medium density residential zones:

Comment: This is because both uses are permitted under the L.E.P.

• 78% of the housing in medium density zones is single dwelling housing and not the desired medium density form.

Overall, the established medium density zoned lands are far from capacity;

Comment:

- a. Existing: This proportion will gradually decrease.
- b. Insufficient motivation to build due to Council Code restrictions; i.e. not profitable.
- Over the past decade there has been a large amount of residential development in business zoned land especially in the Wollongong City Centre. This has diversified housing stock typically taking the form of a mixed use apartment building above a commercial ground level. However, this influx of housing has weakened the intent of business zones, as employment lands are being locked up and transitioned to apartment buildings under strata title.

Comment: Inappropriate Council zoning is now being reviewed.

Housing for Particular Needs:

- The housing needs of different sectors of the community are complex. Different approaches are required to provide choice for residents and to respond to the different levels of assistance required.
- The population of Wollongong L.G.A. is ageing. It has also experienced an increase in the proportion of residents requiring assistance in the daily needs.



• Housing affordability and affordable housing are a large and growing issue for many residents. Affordable housing is an issue for 53% of households throughout Wollongong L.G.A.

Comment:

- a. A better diversity of approval pathways will provide a better 'fit' with complex requirements.
- b. Council's opposition to the 'Missing Middle' code is counterproductive.

Household size vs Dwelling Size:

A mismatch between household size and dwelling size is an emerging trend. There has been a shift towards smaller
household sizes (lone person and couples) and there is fewer one, two and three bedroom housing stock being
developed. There has been a large increase in four bedroom stock.

Comment:

- **a.** Financially independent 'baby boomers' and 'empty nesters' are choosing to retain the family home. This is a generational trend and will eventually reduce.
 - b. Alternative 'lifestyle' accommodation near beaches etc. is seen as too expensive.

Cost of Housing:

- The cost of housing has increased substantially in the Wollongong L.G.A. over the last decade with median house prices increasing by 84% and median unit prices by 65%. Most of this increase has occurred since 2001.
- There has been a strong decline in the proportion of households in Wollongong L.G.A. who can afford to rent or purchase housing.
- There is a large and growing gap between the number of low income households and private rental housing that is affordable for these households.

Comment: This is a national and local trend driven by the Sydney market. Unsolvable directly by Council.

Legislation and Land and Environmental constraints:

 Historical development of residential land did not extensively consider and respond to land and environmental constraints.



- Standardisation of the Local Environmental Plans presented challenge for Wollongong, with the current R2 low density residential zone having resulted from a merge of various other zones.
- Legislative reforms and introduction of Statement Environmental Planning Policies has reduced and/or removed Council's ability to assess the impacts of proposed development. This presents challenge for Wollongong into the future.
- New housing built will need to appropriately respond to the various land and environmental constraints which exist. e g. Flood risk, bushfire risk, riparian corridors, Illawarra Escarpment.

Comment: Generally, these are issues common to all Councils. This 'standardisation' will continue.

Based on the findings of a needs analysis, and issues and options presented in this paper, three key planning priorities for housing are recommended:

- 1. Increase housing stock diversity;
- 2. Plan for future housing growth;
- 3. Increase the supply of affordable rental housing.

Moving forward it is important that the supply of housing delivers the type of housing residents need as our City grows and changes. A diversity of housing types, sizes and price points will assist in meeting this need. Increasing the supply of housing that is adaptable to resident's changing needs is becoming increasingly important in Wollongong L.G.A. as the population ages.

Key recommendations to address the planning priorities are summarised below:

- Increase the number of studio, 1 and 2 bedroom dwellings, to provide options that better match household sizes (e.g. Manor Houses).
- Review the role and operation or character statements and in response to introduction of state policies.
- Increase the supply of adaptable housing stock.
- Preparation of development controls in relation to new forms of housing that diversify housing stock e.g. Fonzie



flats.

- Define areas for urban growth around medium density residential zoned land. Develop an urban growth strategy
 for each area to facilitate an appropriate level of growth whilst achieving the desired local character. Such growth
 will require adequate infrastructure and response to land and environmental constraints.
- Undertake employment and retail lands study to inform development of urban growth areas and business zoned land.
- Support implementation of City Centre Planning and Design Review, West Dapto Vision and West Dapto
 Contributions Plan.
- Continue to develop and implement an Affordable Housing Contribution Scheme for Wollongong L.G.A. under SEPP 70.
- Adopt and implement an affordable rental housing target for Wollongong L.G.A.
- Work with Community Housing Providers and the NSW Land and Housing Corporation to renew and improve and increase social and affordable rental housing supply in Wollongong L.G.A.
- Develop and contribute to partnerships that deliver affordable rental housing.
- Monitor projected dwelling needs, housing supply, affordable housing and capacity of the Wollongong .LG.A. to deliver housing.
- Engage the community in relation to a draft Vision for Housing.
- Review permissibility of residential housing types across R2 Low Density, R3 Medium Density, R1 General Residential, and business zoned land.

It is recommended this paper is exhibited to obtain community feedback regarding housing preferences, issues and options. Council will use community feedback to inform the development of a final Housing Strategy for Wollongong L.G.A.



A housing strategy for Wollongong is being developed to meet the requirements of the NSW Government Local Housing Strategy Guideline. This paper is also being used to inform the preparation of Wollongong L.G.A.'s Local Strategic Planning Statement.

Comment:

a. Recommendations should lead to:

- i. Council code reviews to incentivise more targeted outcomes provided by the private sector and housing trusts.
- ii. Council review of assessment procedures to simplify applications and speed up approvals.
 - b. Community engagement. This document needs to be substantially rewritten for submission to the community.

7.4 Comments on Other Sections of the Paper³ Section 1: Context

Studies commenced in 2005, yet there has been no change to Council's response as these issues have worsened.

1.5 Council Planning Policies

a. Town and Village Planning

Comment: Due to its linear nature, Wollongong developed as a series of semi-independent villages along a transport corridor. Remnants of this can still be interpreted.

These studies need to be given greater weight, both in the community and in the relevant codes.

Section 2: Capacity Analysis

Comment: Achieving set goals requires changes to codes to incentivise providers.

The mismatch between goals and outcomes needs better management, either by Council, or State Government Planning initiatives.

Section 3: Housing for Particular Needs



3.2 Social Housing

Comment: In my professional experience, applications are often met with resistance from Councils and strong protests from neighbours, concerned about drugs, crimes, devaluing of their property.

Instead of broad acre social housing e.g. Unanderra, Bellambi, newer projects are smaller and scattered throughout existing suburbs.

3.3 Housing for Students

Comment: Near the University of Wollongong campus, this is a strong competitor with social housing.

3.4 Housing for Seniors

Comment: At the 'low care/independent' end of the spectrum, this requirement competes with/is part of affordable housing.

Higher needs groups are either cared for by relatives or in aged care institutions. 'Council's scope is limited.'

3.5 Housing for People with disability

Comment: As for Housing for Seniors.

3.6 Affordable Housing

Comment: Council's ability to address this problem directly is limited, however reviewing codes may make this sector more financially attractive to providers. Further delays will exacerbate the problem.

The statistical analysis provided is interesting in a philosophical sense, but in a practical sense, serves only to underline the continuing urgency of the problem.

3.6.8 Council's history with affordable housing

Comment: Although there has been a long term commitment, little has actually been achieved by Council initiatives.

Section 4: Housing Issues

4.2.8 Heritage

Comment: There is a widely held community belief that any heritage listed property is subject to very strict planning controls that affect all aspects of the property, including for example repainting and kitchen/bathroom upgrades.



This belief often results in demolition by neglect or illegal demolition.

Other councils, see appendices, provide useful advice either in the DCP or elsewhere in dealing with heritage listed properties and additions.

Guidelines for adaptive re-use can also be sourced and included.

Owners should be given numerical/qualitative 'bonuses' in planning guidelines to encourage retention of properties.

This principle should also be extended to unlisted buildings within streetscapes with strong and consistent heritage values but which are not listed as Heritage Conservations Areas.

Applicants could make a case for this in applications where proposals blend into the streetscapes.

Section 5: Vision for Housing and Options for Growth

Draft Vision Comments

Comments:

- **a.** Presently, housing of all forms does not respond to either the natural or heritage setting. These requirements need to be made much clearer.
- b. Similarly, for distinctive local character.

5.1 Options

5.1.1 Medium Density Zoned Land

Comments:

Option 1 – No change

Simply re-zoning land will not produce the desired results in a timely manner.

Option 2 – Adjust Controls

- This will make medium density development more attractive to providers.
- b. Reduction in on-site carparking and landscaping should also be considered.

5.1.2 Dwelling Mix



Comments:

Option 1 - No change: Not recommended

Option 2 – Diversify housing stock: See comments above; supported in some circumstances.

5.1.3 Low Rise Medium Density Housing Code

Comments:

- a. Developments will be relatively small in nature, dual occupancies and manor houses (three to four units); terrace houses are not expected to have more uptake, due to the shape of the lot required (wide and shallow).
- b. On small lots, deep soil planting is not expected to provide the cover envisaged in 'Urban Greening'.

 There are code requirements for medium size trees.
- c. For affordable housing, carparking needs are likely to be less.
- d. The Code requires a character statement to be prepared. Council has not excelled in this concern to date, by comparison.
- e. Take up is presently low; there will be an acclimatisation period required.
- f. Generally quantitative built outcomes such as FSR, height, set back are similar in both complying and DA models.
- g. Future take up will depend on the perceived ease of obtaining approvals compared with the current DA/CC process.
- h. Notification. Neighbours comment are required to be considered. This is not consultation; neighbours are not part of the final decision making process (see Appendix relating to 'Inner West' guidelines).
- i. Privacy and solar access requirements are given more consideration than under Council codes.

Exemption from Code

Comments:

a. Unlikely



- b. Possible only if Council could demonstrate equal or better performance.
- c. Manor houses are expected to offer significant cost savings;
 - i. Compact form
 - ii. Simple construction
 - iii. Smaller units

Additionally, comparison between the Code based controls and Wollongong LEP and DCP controls highlighted opportunities for Wollongong to strengthen the internal amenity of dual occupancy and multi dwelling housing, enhance the interface between housing and the street, and remove inconsistencies in DCP provisions. A review of Wollongong DCP provisions relating to dual occupancy development and multi dwelling housing is also recommended.⁴

5.3 Options to improve housing affordability

Comments:

- a. Land cost component will remain the same under all options.
- b. Provision of more, smaller units should be encouraged.
- c. For affordable housing, carparking needs are likely to be less.
- d. Adoption of policies, targets, analysis and advocacy to date, define, but do not solve, the problem.
- 8.0 RESIDENTS' CONCERNS AND ON STREET PARKING
- 8.1 Residents' Concerns

That they are heard.

- 1. Residents are pleased that Council took their advice when an application is refused (irrespective of the reason).
- 2. Residents assume Council is corrupt when their objections are 'ignored' and the application is approved.
- 3. Clearly, this interaction needs to be managed better.



	8.2 Parking			
	The most common resident's concerns are increased traffic and reduced on street car parking.			
	a. Residential use generates relatively low levels of traffic movement, comparatively.			
	b. Existing future on street parking could be better managed;			
	i. Ask applicants to show how new driveway locations can preserve existing car parking spaces.			
	ii. Mark spaces on the street.			
	The 'Low Rise Medium Density Code' or 'Missing Middle Code' provides for a single width driveway access to rear carparking for all housing types.			
	This improves the streetscape by providing more garden area within the front setback but also increases on street parking.			
Typical Wollongong lots or 15.24m to 18.28m (50' to 60') in width;				
	a. A single driveway allows two carparking spaces on the street.			
	 Council policy of double width driveways for dual occupancies reduces this to one, or two half-length spaces either side of the driveway. 			
	Over the last 50 years, or so, ownership of private vehicles has increased substantially and the accommodation of vehicles on-site has become much more visually prominent in the streetscape.			
	a. Previously, a single width driveway led to a garage or carport located behind the dwelling.			
	b. For a period, garages integrated into the dwelling were required to be physically recessed.			
	c. At present, it is common for double garages to be located in front of the remainder of the street elevation, with double-width driveways which reduces the street parking and increases impermeable heat radiating surfaces, which are visually and environmentally undesirable.			
NSWPorts	NSW Ports generally supports the draft Options Paper and the ongoing work of Wollongong City Council (Council) in taking a collaborative strategic approach in the redevelopment of the Wollongong Local Government Area. The Options Paper will			

play a key role in driving decision making across Council and NSW Ports makes the below specific comments:



Rezoning of Key Sites

When considering Planning Proposal requests which will contribute to future dwelling supply within the vicinity of Port Kembla and port related infrastructure, Council must also consider the impact future residential development will have on the operation and development of industrial land and port-related infrastructure.

It is critical that buffer zones around port-related infrastructure (roads, rail and pipelines) are maintained and large parcels of industrial lands near Port Kembla are retained.

NSW Ports advocates for the preservation of industrial lands around Port Kembla for port-related uses. New residential development should not occur at the loss of industrial land which supports Port Kembla. Council must carefully consider strategic planning decisions with the potential to hinder port development, given the significance of Port Kembla to the Illawarra region.

Port Kembla Town Centre

The Options Paper includes a request from the Neighbourhood Forum Alliance to consider low-medium density housing in areas 250m from business zones. The area immediately to the south-west of the Port Kembla town centre is included

in this request. The Options Paper considers the appropriateness of up zoning the area shown in Figure 1 from R2 – Low Density Residential to R3 – Medium Density Residential to encourage the development of town houses, multi dwelling housing and residential flat buildings.





Figure 1: Transition precincts (outlined in red) as nominated by the Neighbourhood Forum Alliance

Given the proximity of the port of Port Kembla to the proposed transition area, NSW Ports encourages Council to investigate future land use conflict of this area thoroughly. In order for the Port of Port Kembla to operate efficiently and meet the trade needs of the State in the future, it must be unencumbered by urban encroachment. The further urban intensification of this land within close proximity of the port would be considered inappropriate. Experiences in other port areas in the State has demonstrated that mitigation of development that is located in inappropriate areas is not the solution to the potential land use conflict. Development controls for sites with direct lines-of-sight to the Port or that have the potential to be impacted by future operations should not be changed to allow for a potential increase to residents exposed to Port impacts.

Dombarton (Future Rail Corridors)

The Options Paper identifies the Dombarton – Wongawilli – Huntley area as requiring 2,052 single dwelling houses and 451 terrace, townhouse, villas 1-2 storey flats and apartments by 2036. Consideration should be given when planning for housing around the Dombarton area to the proposed future Maldon-Dombarton Rail Line. Any development in this area should not impact the alignment or future operation of this freight corridor. Further, the impacts of this corridor on future



	dwellings should also be considered when planning for dwellings located within the vicinity of the Maldon-Dombarton Rail Line.		
	Land Use Compatibility (Existing Rail Corridors)		
	The Options Paper references the opportunity to intensify land around train stations for residential development. From a planning perspective, we appreciate the value and importance of increasing density and the height of buildings adjacent to the Illawarra Rail Line and the Moss Vale to Unanderra Line. However, NSW Ports is concerned that increasing the density of development, in addition to exposing residential and sensitive uses to noise impacts from freight trains could hinder the current and future operation of the freight rail lines.		
	Freight movements along freight corridors commonly occur at night time due to the scheduling of available rail paths on the Illawarra Line and Moss Vale to Unanderra Line. Night time freight movements can increase the acoustic disturbance to residential and sensitive uses if they are not appropriately planned or mitigated through the design and construction phase. On this basis, it will be important for Council to consider the intensification of residential development along rail corridors and ensure the design mitigation measures consider the future noise environment.		
	Given the intent of the Options Paper is to inform changes to the planning controls, the above should be considered as part of the next phase of strategic planning work for Wollongong City Council.		
Resident	Council should partner with an initiative like Nightingale that not only provides housing for sale (and soon to be for rent) atcost, but also does it in an environmentally sustainable way with a focus on community connections. More info here: https://nightingalehousing.org/		
NF5 – Submission 1	At its email meeting on 1st April the Forum agreed that Council be requested that as a matter of extreme urgency they:		
	i reinforce civic leadership in economic development and increase resources to identify and actively court enterprises which have the potential to move to Wollongong, especially to the City Centre;		
	ii protect our suburbs and contribute to the sustainability in our city by amending the DCP, whether or not further amendments are imminent, at:		
	 section 3 of Chapter D1 to revise the Desired Future Character Statements for at the very least the 7 suburbs in the Neighbourhood 5 area, to replace the first or second paragraph as appropriate with: 		
	" (the suburb) will remain a leafy suburb with a mix of housing types ranging from detached dwelling- houses, boarding-houses, villas, townhouses and some residential flat buildings. In this regard new		



	residential development (including boarding houses) in the Low Density Residential R2 Zone beyond 400 metres walking distance of a Commercial Zone or a major employer (eg the University or Hospital), and in the area east of Robsons Road in the case of Keiraville, must have the appearance from the street of a typical house on its own lot in that street"; section 4.1.2.4 of Chapter D4 to replace it with "in R2 Low Density Residential zones, development not directly facing the street is limited to single storey, so as to not adversely impact on the amenity of the adjoining property." (a) clause 3 in Chapter E16: by adding a sub-clause:				
	10 "No new dwellings will be approved in a designated Fire Prone Area if that area is adjacent to the Illawarra Escarpment".				
NF5 – Submission 2	Rezone the 6 – 8 Grand View Parade Lake Heights to RE 1 Public Recreation and petition the State Government to transfer the land to Council.				
	We are aware of Council's reluctance to take on maintenance responsibility for small parks but understand that the local community is exploring whether it could form a bushcare or other group to do the maintenance on behalf of Council.				
NF5 - Submission 3	On Wednesday 5th June the Forum resolved to advise Council that in relation to the Housing Option proposals it considered:				
	1 Housing Diversity,				
	as the medium density zones are clearly not delivering:				
	i support option to prohibit dwelling houses;				
	ii not support, increasing height and floor space ratio;				
	iii support review lot widths, provided they are combined with reduced floor space ratios;				
	iv not support expanding the zones;				
	v not support increasing floor space ratio for more smaller dwellings;				
	vi strongly support seeking exemption from the Low Rise Medium Density Housing Code;				
	vii support one bedroom units above the garage of the main dwelling if it has rear lane access.				
	2 Housing the Aged and People with a Disability:				
	support advocacy proposed.				
	3 Housing Affordability:				



of Christ	an for Charlet Request rezoning of 25 o briefs hoad, right continue handscapes to 85 Medium Density. 2.561a			
Ethos Urban for Church	Seek rezoning of former Bulli Bowling Club site to R3 medium Density Request rezoning of 25 O'Briens Road, Figtree from RU2 Rural Landscapes to R3 Medium Density. 2.98ha			
Bulli BC	supported other than the suggestion that the transition areas are rezoned medium density.			
	6.2.8 Neighbourhood Forums' Alliance Proposals:			
	support a review to limit residential developments in or very near the city centre core;			
	7 Clarifying Zoning Intent - Business Zoned Land:			
	support a major review if it is predicated on reducing medium density floor space ratios in remote locations and on reflecting the character of local street and neighbourhoods;			
	6 Clarifying Zoning Intent - Low Density Residential;			
	support a review boundaries vis-a-vis residential zone;			
	5 Clarifying Zoning Intent - Hospital Precinct;			
	support conversion to a R4 high density residential zone provided that there is no increase in height or density provisions, that it is compatible to adjacent development and that it has local open space existing or proposed nearby			
	4 Clarifying Zoning Intent - R1 General Residential:			
	iv strongly support advocating changes to fiscal and taxation policies to improve housing affordability.			
	iii support working with NSW Land and Housing Corporation to redevelop their holdings;			
	ii not support increase density allowance for Affordable Housing proposals;			
	i support review development controls to increase supply of Liveable Housing (ie dwellings with the capacity to be adapted to cater to the needs of different occupants over time);			





Draft Housing and Affordable Housing Options Paper - Engagement summary report

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Item 4 - Attachment 2 - Feedback on Draft Strategies Presented in Option Paper

1 Exhibition arrangements

On 16 March 2020 Council resolved to exhibit the draft Housing and Affordable Housing Options Paper.

The draft Housing and Affordable Housing Options Paper was available from 19/3/20, but due to COVID 19 the formal exhibition period was from 5/5/20 to 10/7/2020. Due to COVID 19 the exhibition arrangements were modified and included:

- Have your say page and survey on Council's website. The website included:
 - Copies of the various reports
 - Survey
 - Video prepared by Illawarra Housing Trust on Affordable Housing
- Notification to peak groups UDIA, PCA, RDA, IBC
- Notification to all Neighbourhood Forums
- Notification to Statutory authorities
- 3 Social media posts
- On-line briefings to UDIA and PCA committees

2 Submissions

The community provided input via the engagement website, social media and by correspondence.

2.1 Website feedback

Council's engagement website received 1032 visits, of which 330 persons downloaded the draft report (table 1). 51 persons made a submission on the website or completed the survey, detailed in Table 1.

Table 1 Website document downloads

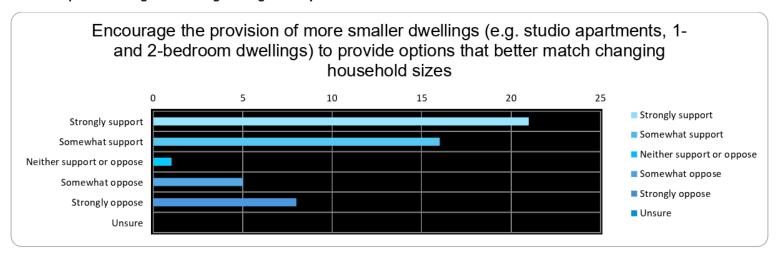
Document	Visitors	Downloads/Views
DRAFT HOUSING AND AFFORDABLE HOUSING OPTIONS		
PAPER - March 2020	211	330
Wollongong City Council Report - 16 March - Item 2 - Public Exhibition of Draft Housing and Affordable Housing		
Options	31	39
Wollongong City Council - Missing Middle Testing Paper		
2020	25	30
Housing Our Community Discussion Paper May 2017	25	38
	20	21
Wollongong Residential Density Study Final Report 2015	20	21
Wollongong City Council meeting minutes 16 March 2020	11	11
Wonding dry Council Meeting minutes to Waren 2020		
Frequently Asked Questions	80	87

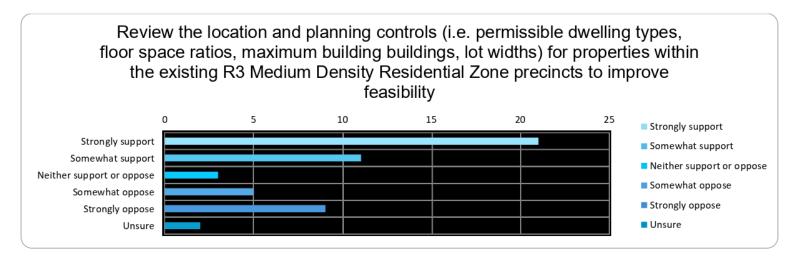


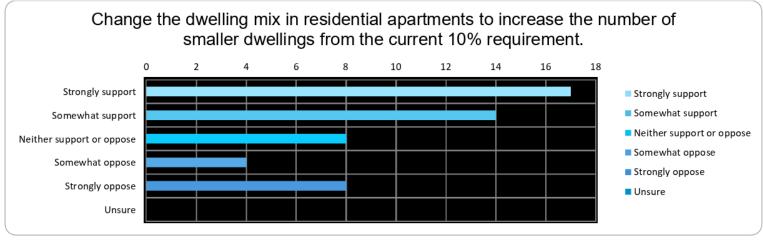
Website survey

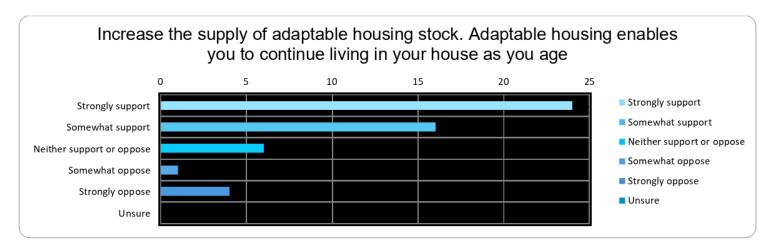
The following graphs summarise the feedback received on the website survey

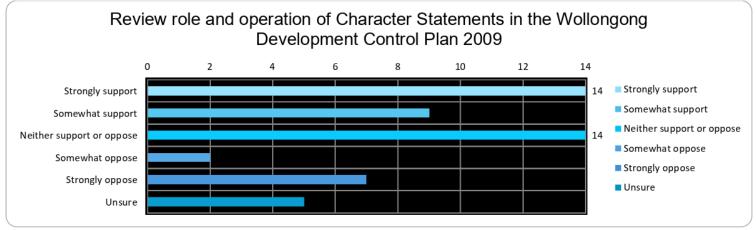
A. Proposals relating to increasing housing diversity



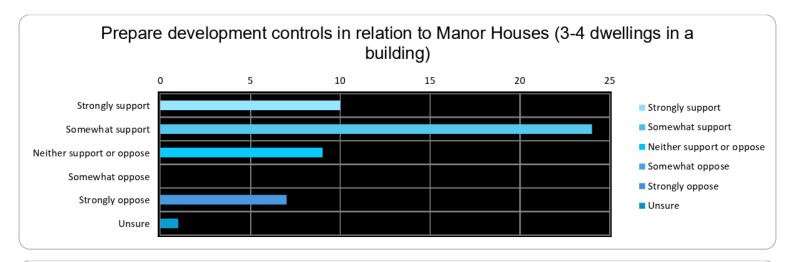


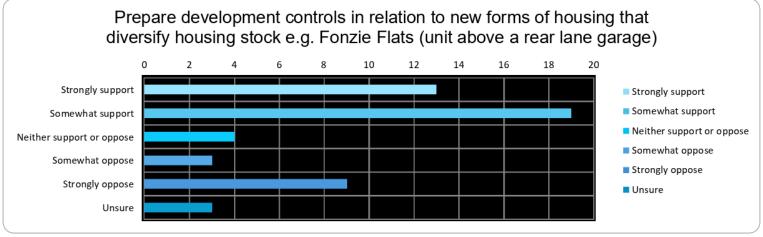






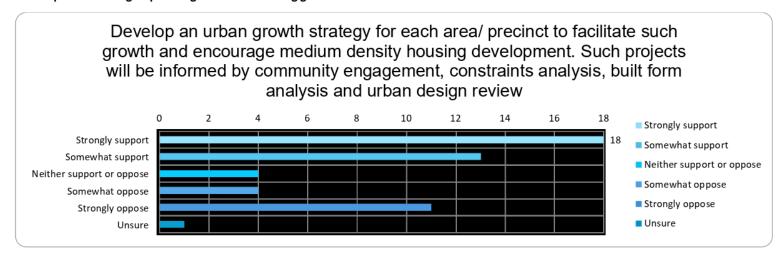






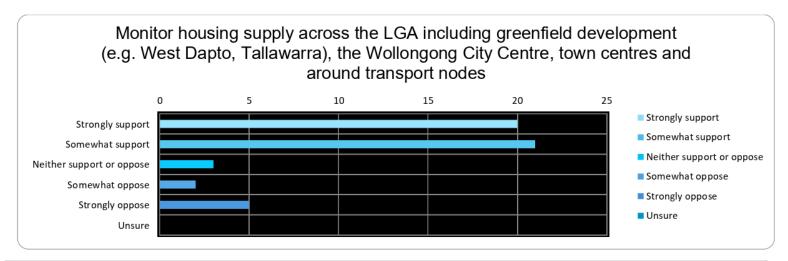


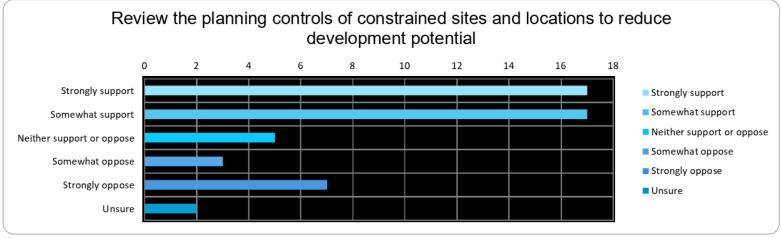
B. Proposals relating to planning for future housing growth

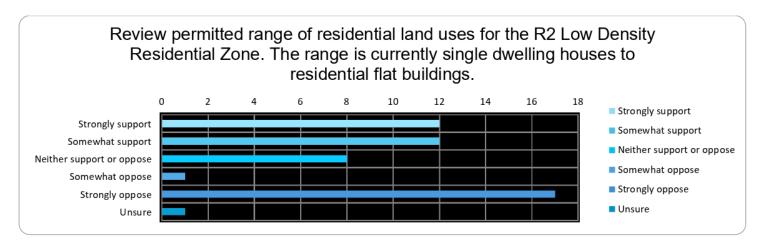


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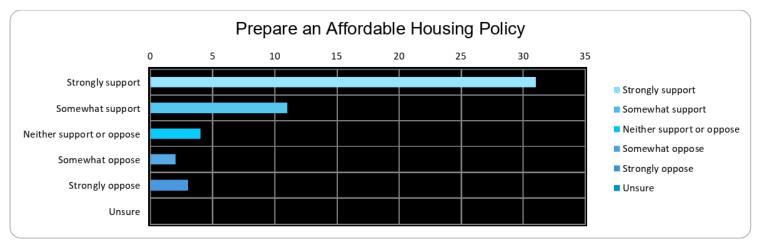






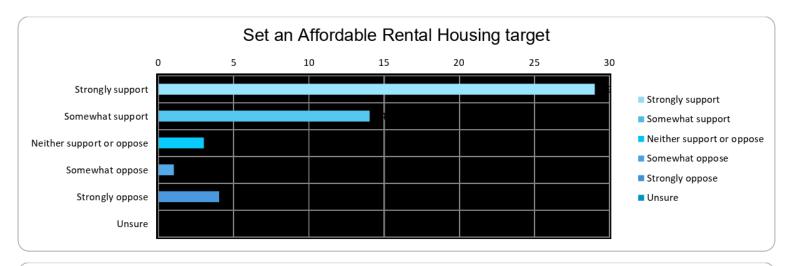


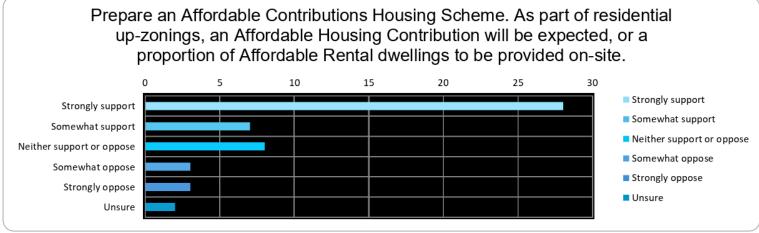
Proposals relating to increasing the supply of affordable rental housing stock C.

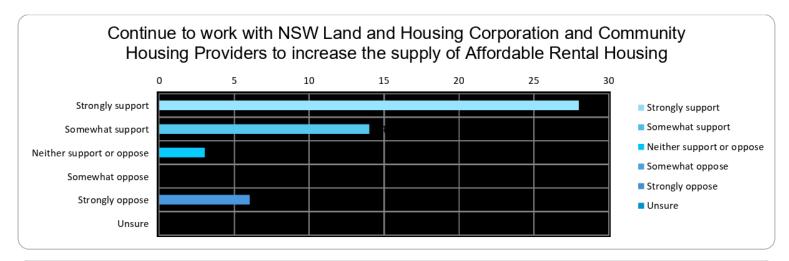


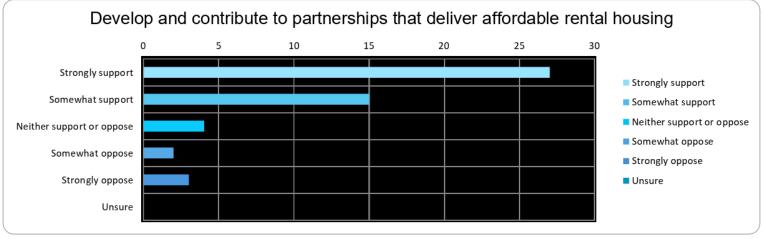
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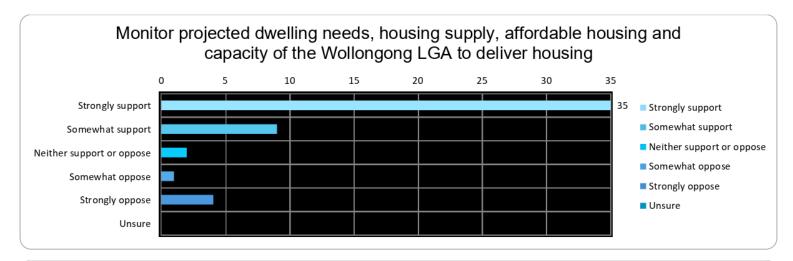


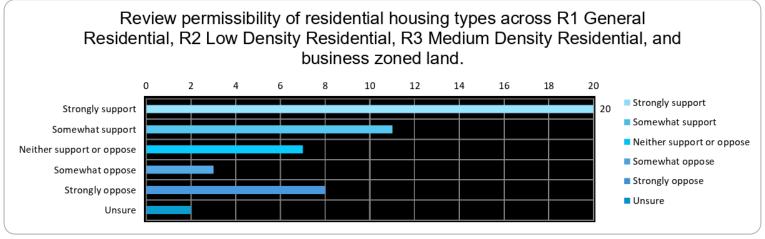




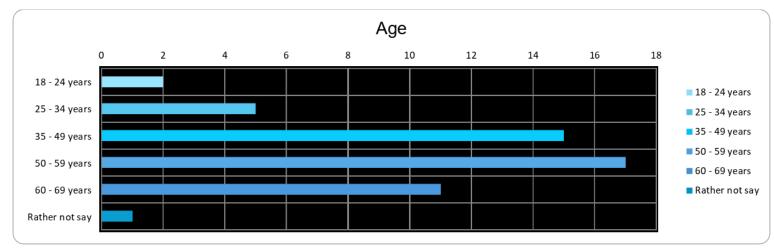


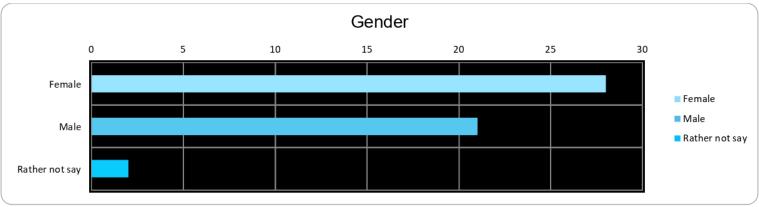


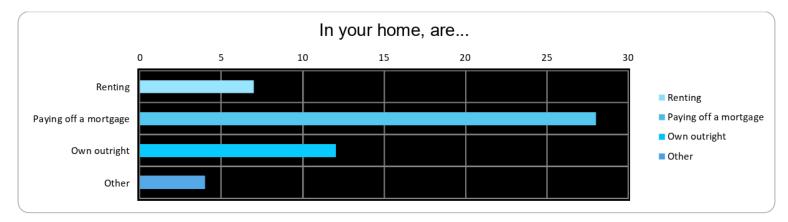


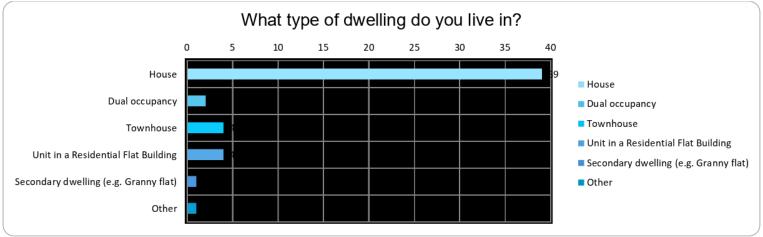


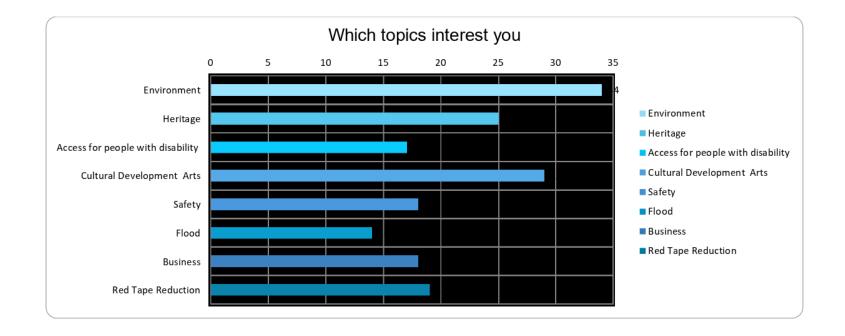
D. Submitter summary











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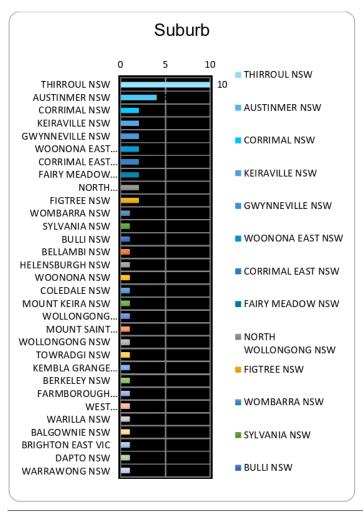


Table 2 Website Free Form comments

What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
Austinmer	House	Paying off a mortgag e	60 - 69 years	Male	Villages should be encouraged to have more smaller dwellings, rather than a single dwelling on a large lot, such as in Thirroul. There could be more encouragement for developers to consider a variety of smaller dwellings such as one bedroom and studio apartments in a smaller development.	The options paper should consider a variety of housing needs that encourages closer community contact between all people ranging from your couples through to seniors. The single standalone dwelling on a large lot if of use to a certain type of family, which is not the majority in Australia. The options paper could also consider the idea of communally owned development such as the Nightingale Model from Victoria. This type of development would apply to certain villages which were close to transport and other services that appeals to couples with young families and also to seniors who could be closer to their children
Corrimal	House	Own outright	60 - 69 years	Female	Not on any suburbs as such, however, a key issue is housing with security of tenancy. It is untenable that a person renting has no security when renting from a private landlord, and can be asked to leave when, for example, a landlord wants to use the home for a friend. Affordable housing needs to be near public transport and not on hills that are impossible to negotiate with a pram or in a wheelchair, or even without footpaths!	It gives me hope for the future of Affordable and social housing, however, I urge you to fast-track the building of affordable housing as the waiting list is awful and having homeless people in our city is a public disgrace. During the pandemic people are housed in hotels, and I am seriously encouraging Council to develop that kind of small dwellings, where people are safe, and can feel pride in having a roof over their head. A roof that is not taken away from them the moment they have financial difficulties, or on a whim of the landlord. Please be aware that there are still unscrupulous developers who are developing sites for 'boarding houses to alleviate homelessness' but which turn out to be houses for transient workers, and too costly for the homeless.
Wollongon	Townhou	Paying	35 - 49	Female	Around the University - overcrowding by	I haven't read it yet, but I will & I will send in my views
g	se	off a	years		students renting houses & noise & nuisance issues, in North Wollongong overcrowding by	separately



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
		mortgag e			Uni students renting units. Cost of rental in North Wollongong is very high.	
Wombarra	House	Paying off a mortgag	50 - 59 years	Female	Thirroul LGA & Bulli with potential over development of Thirroul Town centre and McCauleys estate	
Keiraville.	House	Own outright	Rather not say	Rather not say	With the medium density push for housing into 2500 post code area, I would suggest the push for medium density should remain around transport and shopping centre localities along the Princess Highway extending north and south, and not into the foothills of the Illawarra Escarpment in any suburb. Council's current documents identify east of Robson Road for greater development which is being ignored in recent development approvals.	This survey does not clearly spell out the ramifications of the questions being posed, taking into account any reading of the Housing Affordable Options Paper, any person completing this survey is doing so without clarity. The results of the survey are therefore invalid.
Sylvania	House	Other	60 - 69 years	Male	Helensburgh, This area has enormous potential for housing. There are large areas of unused land, most of it in private ownership. This land is locked up in E2/3/4 zoning's. After decades of trying to get land rezoned for housing in this area, I believe that its time for WCC to revisit Helensburgh and to get an independent assessment of the land that is available and working toward changing the zoning's and allowing residential development in this area. Sooner or later WCC will be forced to release land in Helensburgh /Otford by the sheer	No, but WCC need to increase the housing supply in the municipality. The northern area has the space and all other facilities. Water, Power Sewerage, to expand without causing any problems to the environment.

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					pressure of population. People have to live and start family's and this is the ideal area to do it.	
Thirroul	House	Paying off a mortgag e	50 - 59 years	Female	Thirroul is a heritage area without protection. Please put in some development constraints to preserve the remaining character before it is lost.	
Bulli	House	Paying off a mortgag e	35 - 49 years	Male		
Woonona	House	Paying off a mortgag e	25 - 34 years	Female	Affordable housing should be available in every suburb and not just restricted to a few suburbs. The northern suburbs seem to contain less and less affordable housing and I worry that this could mean less diverse and inclusive suburbs, rather than more.	Affordable housing is needed near good public transport routes (or perhaps good public transport is needed near affordable housing - whichever order you want to build it in). Refugee-specific needs should be addressed. I would like to see an exploration of how to better use existing housing stock (e.g. managing programs that link residents with a granny flat or similar with those who need them). A good example of this is the UOW Homestay program which provides training, mediation, and manages the relationships so that if the visitor (tenant) or family (landlord) has difficulties, they can be addressed quickly and easily. This could be a great model for Wollongong to use more broadly.
Gwynnevill e	House	Paying off a mortgag e	50 - 59 years	Male		
Bellambi	House	Renting	35 - 49 years	Female	In addition to affordable rental housing for people with lower incomes, affordable options for people to own housing at a range	I still have to read the paper, I assume I'll be able to provide comments separately!?



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					of income levels that cannot afford to buy in the current market is important to community diversity and resiliency.	
Helensbur gh	House	Own outright	50 - 59 years	Female	In the draft paper it listed that 81 single dwellings houses were required for Helensburgh by 2036 and in the same paper it stated that the proposed Lady Carrington Estate would deliver 300 low density dwellings, almost a 350% increase on what has been forecasted.	It appears that the paper is not objective in terms on how the existing infrastructure would be enhanced to cater for additional population growth. Don't want the situation were council increase the population, without any regards for the negative impact it will have on existing residents, lack of foresight on increasing the capacity of existing infrastructure to accommodate all residents, so that they live in an harmonious environment
Woonona	House	Own outright	60 - 69 years	Male	While there will obviously be a need to continue to develop housing in the CBD and in other suburbs of Wollongong, I consider that approval the construction of new apartment buildings in excess of 8 stories, like the monstrosities recently erected, is totally inappropriate for Wollongong. The natural beauty of Wollongong, a city resting between the mountains and the sea, does not need high-rise apartment buildings destroying the natural beauty of the landscape right in the middle of the city, nor along its beautiful coastline. Any building height changes need to follow the natural contour of the landscape, keeping building in the areas of Wollongong closest to the sea at lower levels and allowing just a steady increase in building heights stretching back toward the mountain. Wollongong must not become another coastal eyesore, like those produced by	As in my comments in 4 (above), I am concerned that proposed changes to planning controls does not end up turning our beautiful city into a high rise slum. Yes, affordable housing is an important issue but crowding people into high density buildings or suburbs would have disastrous social and community outcomes.



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					excessive high density, high rise apartment buildings that have been approved by Councils in Sydney and along the beaches of Queensland. Attempting to change existing building density guidelines and planning controls that protect our city from over-development along the coastal fringe under the pretext of community discussion papers is not fooling anyone. I don't approve of surveys that are loaded with questions and scenarios that are ambiguous and obviously constructed in an attempt to support a predetermined outcome. If you want the communities support you need to get real people to design clearly articulated questions that are concise and unambiguous.	
Coledale	House	Paying off a mortgag e	50 - 59 years	Female	Clifton to Bulli cannot have more developments where one house is replaced by 4 or 6 town houses. The traffic congestion is becoming to hectic especially when there is one road in & out. Also the land is zone bushfire risk, tourism on weekends is massive a road infrastructure needs to be reviewed.	Affordable housing needs to close to railway stations.
Austinmer	House	Paying off a mortgag e	60 - 69 years	Female	We need to develop housing around transport areas such as Thirroul, Wollongong and Dapto. To include more bike friendly paths to encourage less usage of cars within busy villages such as Thirroul. To allow more flexibility around the Zone R2 areas to allow	The majority of residential development in the smaller villages and towns should allow greater diversity of low cost affordable housing and different housing options, such as studios, smaller one bedroom apartments, within a single dwelling. This would allow seniors or young couples who are seeking to live in a village but without



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					studios, Fonzie flats and Granny flats in this Zone.	the huge cost of purchasing an apartment or single dwelling.
Woonona East	House	Paying off a mortgag e	50 - 59 years	Female	Woonona East. On the basis of the changes you are considering, our neighbours are planning to build TWO two-storey houses (not dual occupancy units) with a footprint that will cover almost their entire block. This will significantly overshadow our property and cause privacy issues. Their architect has advised them this design will be permissible once your foreshadowed changes go through. This is a quiet residential street with mostly single houses and a couple of newer dual occ apartments.	I have no objection to introducing more affordable housing in the LGA, but please don't allow these changes to be a money-grab for people to over-develop their residential blocks and destroy established neighbourhoods.
Mount Keira	House	Paying off a mortgag e	35 - 49 years	Male	YES, my concerns are the escarpment and how close to build on it, especially in established areas where the roads cannot handle the traffic	
Corrimal	Other	Other	35 - 49 years	Male	The amount of vacant units, these can be used as affordable housing. The recession has many vacancies and the price of rent will fall. With the all the units being built we have a lack of car spaces for the elderly and disabled.	When do the landlords decrease the rent? When dept of housing put people in them?
Wollongon g	Townhou se	Paying off a mortgag e	50 - 59 years	Female	Wollongong looks horrendous - there are way too many high rise, clearly Council's grab for grubby cash and lining their pockets to get more rates but the infrastructure of the town does NOT support this obvious over development. Parq is a disaster and the roads around there will not support that over development, the accidents that will happen	good idea



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					near that roundabout and Keira St will occur, the towers in Market St and near the train station are also ugly, towering messes, casting unnecessary vile shadows across the city again with no thought to logistics, infrastructure and roads being able to support the increase in traffic and how much the parking will not be able to support this increase in dwellings - horrendous despicable mess	
Fairy Meadow	Secondar y dwelling (e.g. Granny flat)	Renting	25 - 34 years	Male	I think the growth of property prices in places that were previously (within the last 5 years) affordable (e.g. Dapto) for first-home buyers/young-families has outpaced the potential for these first-home buyers to save and buy within these suburbs. I think the idea of the left-hand building comparison (100DU/HA) on page 12 of the draft paper would better suit inner-city suburbs better, even so far as a range as Unanderra - Bellambi. Furthermore, the foot-print required to live in a house for the average person is quite large (in general), however while many builders would love to build and sell smaller (possibly even tiny home sized) houses current building codes do not allow for such flexibility. This would alleviate many housing concerns	Honestly, I haven't read it: it's insanely long for a draft paper. I'm providing this feedback as a tertiary educated potential first-home buyer as its unlikely you will get many people actually read and provide genuine feedback about it within its current form.



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					within apartment buildings. My only concern with this is it will likely end up with people buying property that won't significantly increase in value and be stuck in an awkward loop of mortgage debt and minimal ability to expand beyond this space.	
Mount Saint Thomas	House	Paying off a mortgag e	35 - 49 years	Male	Affordable housing should not be constrained to "affordable areas." The existing public housing in "desirable" locations such as Cliff Road should be retained, giving residents of public housing the opportunity to live in and enjoy such locations.	
Wollongon g CBD	Unit in a Residenti al Flat Building	Own outright	60 - 69 years	Female	CBD of Wollongong. Oversupply of units without support services as many developments involve over 55s but in reality are over 70s. Crown Mall from top to sea in decline meaning those accessing views, higher value apartments are further removed from services -and car parking access nightmare for short term - supermarkets, pharmacies, other services like hair and clothing	
Towradgi	House	Paying off a mortgag e	35 - 49 years	Male	Escarpment abutting suburbs should be low development. Attention should be paid to environmental protection of critically endangered fauna and flora in the area. Housing should neither be dense nor multistorey in low-density suburbs.	Why does the housing stock have to grow? Why is the natural environment and it's preservation not too priority?
Corrimal	Dual occupanc y	Own outright	35 - 49 years	Female	Na	Na



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Thirroul	House	Paying off a mortgag e	35 - 49 years	Male	Yes Thirroul is over populated and future development needs to stop	I agree with creating affordable housing but if it effects stability of a community than other areas need to be considered
north Gong	Unit in a Residenti al Flat Building	Paying off a mortgag e	25 - 34 years	Male	North Wollongong should be higher density in CBD style, with lower density further out.	It's definitely moving in the right direction for the growth of the area.
Corrimal	House	Paying off a mortgag e	35 - 49 years	Female	As an organisation that represents the needs of vulnerable older people, suburbs that are close to medical and hospital precincts are of particular interest to us for the development of affordable housing options. Locations with access to transport should also be prioritised for affordable housing.	Age Matters, an initiative of IRT Group supports many of the recommendations suggested in the Wollongong Draft Housing and Affordable Options Paper. In particular, we appreciate the inclusion and specific mention of older people and an ageing population as a key priority. With the proposed recommendations proposed in Table 6.1 we suggest that item 1.4 relating to adaptably developments be made a high priority. We also suggest that recommendation 1.6 includes opportunities to investigate other innovative housing supply options such as tiny houses. We would like to see the paper mention the importance of incentives for share/co-housing arrangements, as well as consideration of the wraparound support services that many people require to maintain their tenancies/accommodation. We are pleased to see Council's efforts in developing an Affordable Housing Contribution Scheme for Wollongong LGA under SEPP 70. We would like to ensure that SEPP allocations also consider the unique needs of our ageing population. If a quota for affordable housing development isn't appropriate for high-need group such as older people, it misses the target. We also appreciate the level



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						of diligence required for implementation of the scheme, but highlight that lengthy delays in the process will not meet the immediate need that we see right now in our community. We also strongly support the item 3.10 – partnerships for development and innovation. We agree it is really important to leverage our community capacity and endorse WCC's approach to developing and contributing to partnerships that deliver affordable rental housing. As relationship development is a key cornerstone of partnerships, it would be great to see the principle of partnerships filtered throughout Council's operational principles so that conversations are had with the right people at the right time. Reviewing the range of issues addressed in the options paper we would like to add the following commentary: • We support the creation of studio, 1 and 2 bedroom dwellings, to provide options that better match household sizes. As your report confirms, the location of smaller housing stock (studio, one, two bedroom houses) is declining and unevenly distributed throughout the LGA. The suitability of housing and mismatch between household composition and housing type in the Wollongong LGA is already a pressure felt deeply by older people and continues to present a challenge for the future. • We encourage WCC to use the Illawarra Shoalhaven Regional Plan 2015 – advocate to NSW Government to address the housing affordability gap. We agree that viewing affordable housing options through the continuum of housing framework and identifying the gaps



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						offers a comprehensive approach to the issue. For our clients, older people who require affordable housing, transport is a key factor in appropriate locations. We would like to see Council continue to advocate for better rail services near potential medium density development sites to increase the feasibility of these locations. We note that Wollongong LGA ranks second from the bottom for new supply of planned and complete community housing dwellings. We strongly encourage Wollongong to benchmark their developments against similar regions in the state. (Source: http://communityhousing.org.au/wp-content/uploads/2020/06/CHIA_brochure_NSWsnapshot_100620_D4.pdf) There appears to be a lack of understanding of the specific needs of older renters who require affordable housing that is appropriately located, accessible and safe. Aged Care should not be considered a 'housing' option as trends increasingly promote 'ageing-in-place' in contrast to residential aged care looking after the most frail as they approach end of life. We are very concerned about the significant lack of affordable housing for people on low incomes. When you factor in the specific needs of older renters, the pool of appropriate properties decreases significantly. We would like to see more information on the remaining funds from the Australian Government Grant for Affordable Housing Initiatives, with a growing need for these funds to be put to use quickly.



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						locations of Wollongong land that is available for redevelopment, but also in flood risk zones. While generally not appropriate to further disadvantage vulnerable groups by developing affordable housing on atrisk locations, there may be some basis for medium density developments in some prime locations to better serve the population needs. If affordable housing developments were sited on less hazardous areas within the zone or building controls were adopted to address the risk, it may be worth investigating.
Kembla grange	House	Paying off a mortgag e	35 - 49 years	Female	Yes I do not think flats should be placed in the area of the sanctuary views estate as it takes away the residential views and makes the area seem built up. Many people have moved to this area to escape medium and high rise flats.	No I actually think its great I just don't like the area of Kembla Grange having multi level flats.
Berkeley	House	Paying off a mortgag e	25 - 34 years	Male	Personally I think improving infrastructure (particularly around transport) and public transport in preparation for expected population growth is critical. I'm also in favour of higher housing density near transport hubs and restricting government housing to high density housing options (apartments, flats or Town houses).	Please don't leave transport infrastructure and off street parking behind as we grow our population.
Farmborou gh Heights	House	Paying off a mortgag e	35 - 49 years	Female	There should be affordable and social and community housing option s across the area	
Figtree	House	Own outright	50 - 59 years	Female	I would not like to see anymore huge high rise being built in central Wollongong. They are ugly and block the view to our beautiful	More affordable community housing where the occupier has a stake in the building. Some sort of rent/buy scheme so the occupier can gain equity in the building and ideally



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					escarpment. Low to medium builds should also consider how they impact the views of our gorgeous city. Infrastructure is key to allowing any development to go ahead. High rise only near the rail line. We do not need more cars on our roads along with the huge trucks.	have a say in its design and construction. That way they will care more for the home and actually take ownership of it. Similar schemes have been set up in Europe and shown on Grand Designs UK and are very successful. Our Young people need help to get into the housing market and schemes like these would give them a step in. Government help would be required to fund and set up these schemes but I believe it's a better use of our taxes than the federal government's current funding scheme which is only helping the developers.
Thirroul	House	Paying off a mortgag e	50 - 59 years	Female	Thirroul should not be developed for more housing The current situation in Thirroul is not sustainable. The infrastructure needs to be developed particularly the roads. It's beyond a joke!	Council should consider the current residence needs before adding more residential properties
Thirroul	House	Paying off a mortgag e	60 - 69 years	Male	I live in Thirroul and would like to see some of the older houses preserved from redevelopment.	Housing should not be just for the privileged, it's a basic right. But it should be done with some sympathy and the traffic generated should be an important consideration
Thirroul	House	Own outright	60 - 69 years	Male	Housing needs should be based on geographical area and the ability of that area to comfortable support further housing. Simply referencing projected data to support upgrades on zoning development does not consider the ability of the area to cope with the increased, in any aspect. This leads to the un recountable ruin of our areas, suburbs, and lifestyles.	The local government should approach the State government to opt out of the requirement to develop a policy on affordable housing as the policy will only bring over development, congestion and the downfall of our pristine areas. The affordable housing policy is simply a capitulation to developers and a gateway to overdevelopment.



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West Wollongon g	House	Other	18 - 24 years	Female	I am surprised to see there is no mention in this survey regarding homelessness in Wollongong. Given that homes of all types are becoming less affordable, should we not be concerned about this? I believe more thought should be given to how we may help the most underprivileged in regards to housing in Wollongong. There are many rising trends around the world which seek to make housing more affordable such as the tiny house movement, Earthship house design and the shipping container house. I believe these trends should be considered in discussions around affordable housing.	
Barrack Heights	House	Paying off a mortgag e	50 - 59 years	Female	There is an increased demand for affordable and safe housing near transport hubs ie West Wollongong, Unanderra, Figtree, Dapto. I work with women with a disability who are leaving domestic and family violence and they have very urgent need for safe medium term and long term housing that is also accessible. They often cannot afford private rental and the wait for public or social housing is too long to meet their needs after leaving crisis accommodation.	This is a good and overdue initiative that needs to be led by Council and not just left up to the market. We have tens of thousands of people in our region that find private rental accommodation unaffordable. The needs of people need to be put in front of profit by the private sector.
Balgownie	House	Paying off a mortgag e	60 - 69 years	Male	Bring back 3 storey walk up unit blocks. HOWI Insurance changes killed off the most efficient and effective means of supplying affordable housing.	The focus tends to be dominated by social housing, not surprising given the advocacy of 'The Housing Trust' and other social housing providers. There is no advocacy group for affordable housing for purchase or to increase rental stock. The NRAS disaster was caused by a policy formulated without reference to the finance industry.



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
						NRAS was unbankable, and cheap bank finance for construction and purchase is the most critical component of affordability.
Brighton	House	Own outright	50 - 59 years	Male		
Fairy Meadow	Townhou se	Renting	50 - 59 years	Female	Affordable housing should be spread out in the community not all clustered together in one block	No
Dapto	House	Paying off a mortgag e	50 - 59 years	Female	West DAPTO - What a mess, school is overcrowded, high school will be the same and estate does not compare to Calderwood. Stop taking away all the green spaces for the sake of a few dollars. Affordable options need to be included throughout more areas in the Illawarra.	Understand housing is a priority, but more for thought into establishing schools, and infrastructure etc prior to developments commencing. Option to allow for more green spaces and council taking back the land that should never have been built on ie flood zones, these are natural waterways.
North Wollongon g	Unit in a Residenti al Flat Building	Renting	50 - 59 years	Male	Around City Centre North Wollongong area should be high density	
Thirroul	House	Own outright	50 - 59 years	Male	The northern suburbs of Wollongong ie Bulli through Helensburgh, does not lend itself to higher density dwellings. constrained between the escarpment and the sea, any potential for higher density housing would have a dramatic effect on the arterial roads, traffic, heritage, environment and local character. All medium and high areas development must cease until vehicular accessibility is solved.	consideration must be given to the employment location as a priority, the Wollongong LGA has not the job potential to support current and potential housing projections. Therefore if more people reside in the area they will need to travel (via public or private transport). This area does not provide sufficient avenues for transport to greater Sydney or south to Canberra. Until the transport infrastructure needs area determined, simply increasing the general population would create transport Chaos throughout. long term solutions like the connection of the northern distributor to the F6, improvement of rail inclusive of stopping at all stations to



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
						remove traffic and parking chaos, removal of the morning "express trains". Upgrade of the rail aqueduct. filling the area with more people before looking into infrastructure sustainability will only create more problems for all residents, present and future.
Gwynnevill e	Townhou se	Renting	35 - 49 years	Female		
Thirroul	House	Paying off a mortgag e	35 - 49 years	Female	I agree with Council's statement about Thirroul and infrastructure constraints in the Northern Suburbs (pg.68). The Northern Suburbs has seen a "death by one thousand cuts" through slow density increases over time, mainly through residential subdivision. This has compounded the strain on the road network, and is now a safety and emergency response hazard. The community does not want a freeway. Density is more appropriate in areas that are less constrained, have infrastructure and need urban renewal - e.g. Corrimal, Fairy Meadow, the area surrounding North Wollongong train station, Dapto and Port Kembla. Densities in Thirroul should, if anything, be DECREASED, except for the vicinity directly surrounding the train station.	Do not increase densities north of Bulli. Allow for increased supply of smaller unit housing (housing mix) in centres well serviced by train stations and arterial road links including Corrimal, Fairy Meadow, the precinct around North Wollongong Train station, Dapto and Port Kembla.
Austinmer	Dual occupanc y	Renting	25 - 34 years	Male	I would like to see clever uses of existing low- medium scale areas to allow for well- designed secondary dwellings, retrofitting large homes as dual occupancy's, and manor homes. There is huge potential to gain a	Work needs to be done to ensure a genuine mix of uses is achieved within centres, especially within the CBD. This needs to be done by requiring minimum non-resi GFA. Additionally, design excellence should be recognised in

What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
					residential areas without impacting on landscaped quality, open space, and considerate design. Flexibility is key, with good and innovative design encouraged rather than stifled.	redevelopment also. This should help to encourage creative, innovative and noteworthy design that doesn't necessarily comply strictly with all controls.
Woonona	House	Own outright	50 - 59 years	Female		
Austinmer	Unit in a Residenti al Flat Building	Paying off a mortgag e	60 - 69 years	Female	There is an urgent need for more social and affordable housing in the Northern suburbs.	
Figtree	House	Other	18 - 24 years	Male		
Thirroul	House	Own outright	50 - 59 years	Rather not say	The development of new housing in the northern Illawarra must be carefully considered. While there is only a one road I /out further development must not be considered. This is nothing to do with elitism it's about safety and danger as one road does not cut it. Realistically there is no room for further housing in these areas. Corrimal, Dapto and port Kembla have both good road networks and need the revitalisation	Yes whilst there is only one road past Bulli Pass these suburbs should not be considered for growth hubs
Keiraville	House	Renting	35 - 49 years	Female		
Thirroul	House	Paying off a mortgag e	60 - 69 years	Female	Before any further development in the northern suburbs of Wollongong a thorough and comprehensive study of traffic needs to occur. This should also result in options. One	I don't have an issue with the provision of affordable housing. However, this should not mean that the buildings lack architectural merit. Good aesthetics is important, as is liveability. The buildings need to be built



What suburb do you live in?	What type of dwelling do you live in?	In your home, are you	Age	Gender	Do you have a view on housing in any particular suburbs or areas of Wollongong?	Do you have any comments on the Draft Housing and Affordable Housing Options Paper?
					could be to develop an alternative route to and from the northern suburbs. An alternative route is essential as should there be an incident, emergency vehicles need to be able to reach the incident in rapid time. This is currently not possible. Having an alternative route through the east from Bulli to Thirroul would help ease this. The northern suburbs should be excluded from any high rise development. Continuation of the current 3 storey limit is essential to maintain the village feel that visitors travel to the northern suburbs to enjoy. Thirroul needs to maintain the village feel (which is currently under threat) as it has a good stock of heritage buildings in the shopping precinct and has good views of the State heritage listed Illawarra escarpment. Council needs to ensure these are protected.	with environmentally friendly materials and have good access to solar to reduce the reliance on artificial lighting and heating. I suggest checking out various housing projects built in such countries as the Nederland's and Britain as inspiration. As such developments do not always have to be high rise. I am not fond of the student housing precinct as it appears too cramped and uninviting. This is not good architecture. I would hate to see more of this across Wollongong. We can do better.



Item 4 - Attachment 2 - Feedback on Draft Strategies Presented in Option Paper

2.2 Social Media comments

The 3 Social media posts had a total reach of 23, 512 and 55,952 impressions. The posts were clicked on 1548 times and there was 219 clicks through to Council's engagement page. The comments are summarised in Tables 3 and 4.

Post 1-1/5/20



We're seeking community input on the draft Housing and Affordable Housing Options Paper until 10 July 2020. The paper provides options on increasing the number of houses and apartments that are smaller and more affordable, and we'd like community input on which options should be supported and where additional housing should be located.

Everyone can contribute, please visit https://our.wollongong.nsw.gov.au/ to give your feedback.



3,660	185	D
People reached	Engagements	Boost Post



5 comments 5 shares

Table 3 - Post 1 comments

Comment	Likes	Comments on Comment	Likes
400sq mtr blocks already? how small			
do you need to go for \$400K			
Affordable Housing now that's a joke			
in Australia			
Could you do a one page 'tick & flick'	1		
please. I attempted to give my opinion			



but seriously, do you expect everyone to read the 121 page document?	
Wollongong doesn't need any more housing. We are full	

Post 2 - 11/6/20

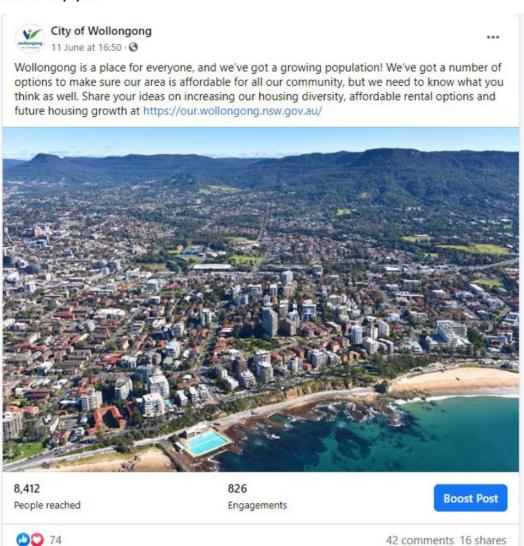


Table 4 - Post 2 comments

Comment	Likes	Comments on Comment	
Just make it easier for people to get	3		
into housing			
Improve the infrastructure before	12		
more ugly high rise.	100,000,000		



Cave houses in the side of the	8	imagine looking out at the view to a	
escarpment		bunch of sweaty Sublime walkers!	
Where are local jobs to match	15		
population growth? More people			
cramming into public transport or			
driving to Sydney is not sustainable.			
Definitely the infrastructure! How can	14	Corrimal Coke Works!!	1
you allow huge estates to be built with			
one road in and out onto one road			
that leads left or right? Ridiculous			
planning.			
		West Dapto, Gainsborough Estate,	3
		Sandon Point, Bombo Heights, Bulli	
		Heights, Woonona Heights, Stanwell	
		Tops, Darkes Forest, Farmborough	
		Heights, Rose Valley, Broughton Vale,	
		Killalea, Curramore. That's just off the	
		top of my head. Criminal.	
		I'll donate \$1000 to anyone affected by	1
		the Coke Worksif they lived in the	
		area BEFORE the works were built	
		Stanwell Park to Bulli - what a joke!!!	
		Cannot leave our place on a weekend!	
		and you think council are responsible	
		for that?	
		welcome to Albion Park.	
		I had Calderwood in mind	
		Actually, it starts from Bald Hill. They	1
		market the northern Illawarra as a	
		tourist destination but do not have	
		capacity to manage the result. There's	
		one road in and out which is choked	
		with tourists, there's no parking yet	
		council approved a 350 seat restaurant	
		at Clifton, they've built expensive	
		walking tracks but again no parking.	
		look at the mess at Scarborough pub!!	
		Look at the chaos at the Sea Cliff bridge	
		and the trespassers dying off the cliff.	
		council marketing is bringing more and	
		more tourists and issues (all these	
		rescues cost \$\$\$) It's not	
		sustainable, the economic benefit is	
		minimal and there is a massive impact	
		on residents whose rates are not being	
		used to service them but hordes of day	
		trippers.	
People will want to live here if they			
can get to work on a decent railway			
system!!!			



to be able to afford in the north beach precinct. I think from Corrimal St at the north beach end council should allow for up to twenty five stories for apartments .the area there is so expensive at the moment in north beach area be nice to live a couple of blocks from north beach .if you allow more apartments there then property values would come down and be affordable to all to live in such a beautiful part of Wollongong .Corrimal St high rise would not affect the shadowing of the beach .more development will also provide more jobs which we lack in our city .and allow more housing up in the escarpment as well .our city needs better connectivity it's too fragmented we should invest in light rail from the top of crown St to through the mall and to the bottom and round to Cliff Rd down to the lagoon .would get more people mobile and they would leave their cars at home .the light rail would cater for workers shoppers people going to both hospitals and beach goers .with future extensions from the top of Crown St to West Wollongong Figtree, Unanderra and Dapto .future proofing our city is important .the less cars on the road the better .	2	I like the rail idea, but not the high rises. Wollongong is already getting too many blocking the views of the escarpment and losing its charm.	5
		by limiting the population, you are limiting everything else there will be no need for better infrastructure and small businesses will suffer.	
		sure, but this place is a country town that has spread. It features very few « city » characteristics. The root of the problem needs addressing: the jobless are jobless because of lack of educational opportunities, and before we blame the government for that, it starts with parents encouraging kids to make the most of every high school opportunity - this starts way before TAFE age.	1
		"Allow up to 25 stories Then property values would come down". yes, you	1



I	I		
		would usually find lower property	
		values in a ghetto	
		25 storeys and some people on lower	
		floors would never get any sunlight and	
		that'll be the people that you are	
		supposedly trying to help. Developers	
		would just get greedier.	
		country town maybe 50 years ago.	
		located only 1hour or so from the	
		biggest city in Australia we should be	
		taking advantage of this.	
Faster, more frequent rail system.	8	Nothing to do with council you need	1
		to lobby your state MP for that it	
		would need the track to be widened	
		from single to double in some areas or	
		else a whole new route unlikely to	
		improve any time soon sadly	
You must make sure any new			
developments of apartment not only			
fit into the area. But must see extra			
homes added. Not huge			
developments 8 storeys high with one			
owner per floor! That is not what our			
city development should be.			
Rent to buy options or dual rent/buy	9		
with Housing orgs.			
50yrs latter and Dapto on and off	2		
ramps never will be seen in our			
lifetime.			
Affordability that's a joke in Australia	1		
One of the area's biggest employers is	8		
Wollongong Uni, which is set to start			
swinging the axe on jobs because of			
COVID and massive student losses.			
The mining industry has been			
decimated and the steel works is just			
a shadow of the glory days. Public			
transport is a complete joke, and zero			
infrastructure for tourism, take a look			
at the lack of parking at WIN stadium			
for example. Wollongong council,			
completely out of touch with reality.			
Just finished watching Filthy Rich &	4	Uni students eat up all the rentals	
Homeless on SBS in which Wollongong		around the Wollongong area	
and the Illawarra featured heavily.			
There's a shortage of affordable			
housing full stop, let alone public			
housing. Then there's the lack of			
affordable rentals for people who will			
never be able to buy in the area; those			
that have and will always need to rent			
into and initially floor to felle		I	

Paper

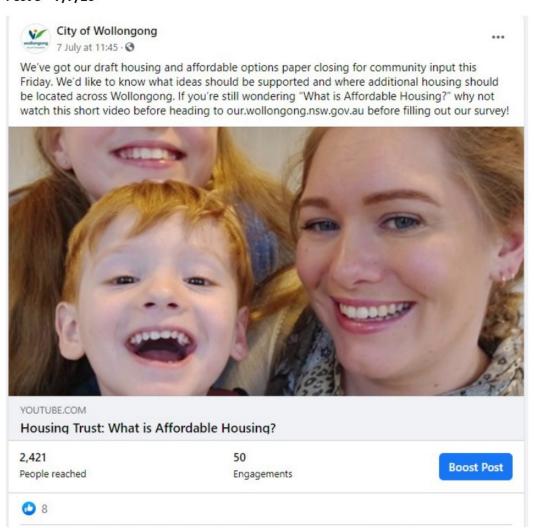


here. Rentals are fast approaching			
unaffordable levels for all but the			
highly paid. Shame nobody seems			
concerned about that!			
If you could stop developments	3		
encroaching further and further up			
the escarpment that would be great.			
The natural beauty of Wollongong is			
getting ruined from our growing			
population. Build more high rise			
residential to end the urban sprawl			
(plague) of our beautiful landscape			
here in the gong.			
Wollongong city council, in case the	3	the only traffic I've experienced is the	
point hasn't been heard, the residents		bottle neck at Albion Park Rail, and the	
of Wollongong are not happy with the		Lawrence Hargrave Drive,	
congestion of our main roads,		Thirroul/Austinmer. Any other traffic	
difficulty in finding early child day		seems to clear very quickly. In regards	
care, ever shrinking Minimum		to land sizes, aren't smaller blocks	
residential land Sizes from subdivision		more affordable? Traffic lights are	
and Estate developments (eg Bulli		there to amend traffic issues, as	
brick works), the increasing growth of		inconvenient as they seem, they are a	
traffic lights, sure there is more on the		solution to traffic congestion	
list. If there was a clear plan to			
manage all of these things then maybe			
the area could accommodate more			
development happily. But start with			
some long term visions. What do you			
want the Illawarra to be, tell us, put			
out a vision statement.			
		Areas I've personally experienced	
		traffic on a regular basis are Lawrence	
		Hargrave Drive between Austinmer and	
		Bulli, memorial drive heading north	
		from Wollongong to Towradgi, the	
		highway from Albion Park to	
		Wollongong morning peak hour can be	
		hectic too. The RMS is well aware of	
		these issues and very recently opened	
		a community survey to further identify	
		trouble spots along Lawrence Hargrave	
		Drive. I don't think they have Released	
		any conclusions or plans for	
		improvement from that yet. It would	
		seem sensible to look at this as part of	
		any future planning for development.	
You can start by getting the State	1		
Government to have a 24 hour public			
transport system. Not everyone works			
		I	
locally or within standard 9 to 5 hours. Stop pushing against manor housing.			



I watched a three part series on homeless people on SBS and I think that there should be a huge increase in social housing. It would be great if council could be given financial aid from the Federal Government to aid in this. All councils in Australia should receive help in this area too. It would be a way to help get the economy moving as we move through the Covid 19 situation.	1	
And the bus are every hour in Sydney their every fifteen minutes so why can't Wollongong do the same	0	

Post 3 - 7/7/20





Item 4 - Attachment 2 - Feedback on Draft Strategies Presented in Option Paper

2.3 Written submissions

18 written submissions were received:

- 3 from Statutory Authorities:
 - Water NSW
 - o Illawarra Shoalhaven Local Health District (2 submissions)
- 3 from Peak Groups:
 - o Urban Development Institute of Australia Illawarra
 - o Property Council of Australia Illawarra
 - o Shelter NSW
- Non-for profit Illawarra Housing Trust
- NSW Ports
- Neighbourhood Forum 5 (3 submissions)
- Heritage Solutions
- 4 from residents
- 2 on behalf of landowners seeking increased housing opportunities on specific sites.

The submissions are summarised in Table 5.

Submissions from Housing Trust, Shelter NSW and Heritage Solutions were very detailed.

Key issues raised in written submissions:

Submitter	
Shelter NSW	Shelter NSW Comments on Housing Related Issues in Wollongong Draft LSPS and Draft Wollongong Housing and Affordable Housing Options Papers.
	The following points outline Shelter NSW suggestions for Council to consider in its deliberation and implementation of its Draft Wollongong LSPS and draft Wollongong Housing and Affordable Housing Options Papers
	Purpose-built housing for younger persons with a disability
	Council has indicated a commitment to advocate for purpose-built housing for young people with a disability and to partner with local stakeholders to raise awareness of the current policy directions, and funding opportunities to develop housing that will address the unmet need. Shelter NSW sees younger people living in nursing home facilities as a major failure of the disability support system. Because of this, we recommend that the Council include in its partnership arrangements with organisations such as the Illawarra housing trust a requirement for them to deliver housing options for younger people with disabilities. Alternatively, as part of its housing funds and tender process its priorities funds being allocated to the organisation's committed to delivering homes for this target group.
	Implementing an affordable housing scheme in line with SEPP 70 (Affordable Housing Contributions Scheme) for Wollongong LGA
	Council committed to implementing an affordable housing scheme in line with SEPP 70 (Affordable Housing Contributions Scheme) for Wollongong LGA. Considering the high level of unmet need within the LGA Shelter NSW fully supports this initiative. However, to capture uplift and deliver any affordable housing, the proposed scheme has to already be outlined in Council LEP, as this is not currently the situation many major rezoning will take place before any new LEP is approved for Wollongong. To address this issue, Shelter NSW suggests that a complementary framework (planning agreements) be put in place to capture uplift and deliver affordable housing in the meantime. This framework will also allow a % of affordable housing to be acquired on major developments being determined through a gateway process. One best practice option is for Council's planning agreement policy to include a clause to provide affordable housing (See an example of Randwick Council https://www.randwick.nsw.gov.au/ data/assets/pdf file/0007/25990/Planning- Agreements-Policy.pdf or Canterbury Bankstown draft Planning Agreement Policy which includes the following clause - Provision of affordable housing where a Planning Proposal is seeking an uplift of residential floor space that exceeds 1,000 sqm of gross floor area (as defined in the applicable local environmental plan), the equivalent of at least 5 percent of the increased residential floor space should be dedicated to Council in the form of residential dwellings for affordable housing, or as a cash payment for affordable housing.

Shelter NSW suggests that Council create a planning agreement framework to capture its nominated affordable housing target for until the new LEP is in place. We suggest that the Council consider Shelter NSW recommended target of 10% of any additional uplift for affordable housing.

Shelter NSW would also suggest that Council have an affordable housing contribution rate be for both residential and non-residential land use zones. This is the case with a number of Council and one example is the City of Sydney who has the following:

Residential development

On-site: 3% of the total residential floor area must be provided as affordable housing.

Monetary: \$214.17 per square metre of the total residential floor area.

Non-residential development

On-site: 1% of the total non-residential floor area must be provided as affordable housing.

Monetary: \$71.36 per square metre of the total non-residential floor area.

Affordable rental housing target for the LGA

Council wants to implement an affordable rental housing target for Wollongong LGA, such an initiative would complement SEPP 70 Affordable Housing Contributions Scheme.

Shelter NSW suggests that the Council set a broad affordable housing target that's around 20% of all housing stock. This could then be broken down by, affordable, community, and public housing. One example of this is Sydney City Council <u>Sustainable Sydney 2030</u> which establishes the following targets by 2030, 7.5% of all housing in the local area will be social housing provided by the government and community providers, and 7.5% will be affordable housing delivered by not-for-profit or other providers.

Work with NSW Land and Housing Corporation regarding the renewal and maintenance of social housing

The report recommends that Council work with NSW Land and Housing Corporation regarding the renewal and maintenance of social housing to make better use of the land available in suburbs that have smaller older style social housing dwellings on large lots. This alights with the NSW Land and Housing Corporations Communities Plus housing model based on mixed tenure and includes private market housing through joint venture arrangements. Shelters NSW feels that although this initiative aims to deliver better housing outcomes, they often miss meeting their overall objectives and targets without strong oversight. We suggest that the Council monitor the desired outcomes, and aim to ensure that any of the community plus projects increase the proportion of public housing and that they align with



any unmet bedroom requirement in the Wollongong LGA. Shelter NSW would argue that the proportion of social housing in Wollongong LGA should be increased not just maintained.

Analyze and update data related to affordable housing

Council has undertaken to analyze and update data related to affordable housing for each census period. Shelter NSW suggests that Council also tract any affordable housing approvals as this would enable a clear understanding of what type of affordable housing is being delivered in the Wollongong LGA and would enable Council to respond proactively to the needs of its communities and any losses or increases of stock in this market segment.

Incentives to encourage diversity in housing stock across Wollongong LGA in particular more one- and two-bedroom dwellings

One recommended action to Council is to implement planning incentives and requirements to encourage diversity in housing stock across Wollongong LGA, in particular, the development of more one- and two-bedroom dwellings. This is important given that annually the addition of new dwellings represents around 1.08% of the total dwelling stock — so change occurs very slowly. Shelter NSW feels that given the current overwhelming trend by developers to build three-and four-bedrooms dwellings that strong incentives will be required to ensure a better balance of bedroom types based on need is delivered into the future.

Undertakes workshops with local developers and builders on ways to deliver more diverse housing opportunities

We recommend that Council undertake workshops with local developers and builders on ways to deliver more diverse housing opportunities linked to town centres and essential infrastructure.

Tax reform to improve housing affordability

One proposed action was for Council to advocate the NSW and Australian Government on tax reform to improve housing affordability. Both Shelter NSW and National Shelter have been advocating for tax reform to improve housing affordability outcomes for all Australians and would be happy to work with Wollongong Council on these matters.

Review the ARH SEPP 2009

One suggested action is for Council to approach the NSW Government to evaluate and review the ARH SEPP 2009 to distinguish if the Policy is delivering the intended affordable housing outcomes. The capacity of the ARH SEPP to deliver affordability has been a concern expressed by many LGA authorities. Interestingly the Manor Houses provisions in the new Medium Density Housing Code are technically based on new generation boarding houses without the strata titling restrictions of the AH SEPP. Shelter NSW has had representation from a number of our member organization on

this matter and its capacity to improve housing affordability outcomes and we would be happy to work with Council on this matter in the future.

Deliver better housing options for its aging population

Council's reports are concerned about how to deliver better housing options for its aging population. Shelter NSW suggests that Council look at ways to deliver seniors housing options in locations close to town and villages centres (taking into consideration land and environmental constraints) to close the mismatch gap between current and future supply and the needs of older residents.

Review existing residential land zones to support older residential to age in place Throughout the reports, the need for Council to review its existing residential land zones is indicated. Shelter NSW suggests that Council consider replacing Low-Density Residential Zone (R2) with General Residential (R1), especially in areas located around town centres. This would support opportunities for different housing options to be delivered and help older residential to age in place. To ensure that any new residential development is not entirely out of character with the existing, this review could sit alongside an evaluation of height controls and character assessment requirements. This recommendation from Shelter NSW is based on the capacity of the General Residential (R1) Zones to deliver more housing choice in area with good access to infrastructure and services.

Recognition that affordable housing (including public and community housing) as essential infrastructure

We would encourage Council to support the recognition that affordable housing (including public and community housing) as essential infrastructure in any future planning document (This definition is from the Australian Infrastructure Audit 2019).

Mitigate measure re loss to affordable rental accommodation to short-term visitor rental

One additional stress in the housing market in coastal location is the issue of residential housing being lost to short-term visitor rental accommodation. Council could consider investigating opportunities to mitigate these impacts by applying a cap similar to the short-term accommodation rules for greater Sydney.

Incentives to organisation or authorities that deliver affordable housing in perpetuity

That Council considers including in its local housing strategy the following incentives to organisation or authorities that deliver affordable housing in perpetuity: a fast track DA process, fee reduction or waiver, density bonus, car parking reduction bonus, waving or varying s7.11 contributions. We recommend that any exemption should be targeted at public housing or not-for-profit developers (CHPs), linked to the affordable housing being secured in



	perpetuity, not for a minimum of ten years.
	Support for Local Aboriginal Land Council to delivery additional housing opportunities
	Shelter NSW would like to see a commitment by Council to work with the Local Aboriginal Land Council on the
	development of a strategic plan for their landholders aimed at supporting the delivery of additional housing opportunities.
Resident Wollongong	I would like to make some comments. They are based on my experiences and my own personal values, which I would characterise as rather conservative and belief that people should be able to choose their housing, lifestyle whilst recognising the costs of those choices
	 My grandparents lived on a site approximately 2/3 of an acre at the intersection of Macquarie & Mercury Streets. They lived there for just over 50 years- 40 of which were as tenants as the housing was provided by my grandfather's employer, initially the Vickery family from about 1915-1935 and then AIS (Mt Keira mines), when he retired in about 1955 coinciding with the closure of the Mt Keira Mine Tramway, he was given the opportunity to purchase the property. It was my wish that the next generation of the family would live there but the property was rezoned resulting in its sale and the building of three units residential building with 25 units. My grandfather allowed people to use both the tennis court and gardens, including garden parties to raise funds for charity/community groups. Obviously it provided many trees consistent with the area being called Garden Hill. The area is now medium/high density area with no public park (in area bounded by south coast railway, Crown Street, Mercury Street and Tramway Drive) and very few trees. I live in a 3 bedroom unit as a tenant. It was built as there is a strong belief that 3 bedroom units are a better investment than 2 bedroom units. One of my aunts lived in her house till 2 days before her death. It was 3 bedroom 2 bathroom plus sunroom. She would not move out of her house because it had memories of her life with her husband. The idea that older people should move out of houses to a smaller residence should not override people's choices especially older people. I note the push to have smaller homes – less bedrooms. But almost all surveys suggest that each child should have their own bedroom and so in many family cases, there is a need for 4 bedroom homes - I think or believe that that is what most couples with children want or believe to be appropriate for them – issue is raised in Page ii of the Executive Summary. The buying public should choose their preferred housing size (and style). The fact that



- d. Rezoning seems to cater fpr the developers rather than existing residents.
- e. I reject Council's placing so much emphasis on Council's future plans for the area. Current residents and their preference should override the developers interest and Council's plan for the future character of the area. Having said that, I believe housing is too expensive but the questions are:
 - a. Why is housing so expensive/
 - b. How can housing affordability be achieved?

I note the document shows median housing prices have increased by 84% and median unit princes have increased by 65%. I believe that in part negative gearing has led to increase in housing prices, so if negative gearing was abandoned, housing prices increases would decrease – but that is a Federal matter not Local Government.

Is this occurred then hopefully housing prices increase would decrease and housing become more affordable.

I believe that housing affordability and provision of affordable housing is a State or Federal responsibility not that of Local Government.

I would hope that housing costs or rental increases should be close to consumer price index. However page 27 suggest that rents have increased 3.5 times since 1990 with most growth occurring since 2001. Yet if at consumer price index this might mean an increase of about 1.0 times and not 3.5 times.

So again why is pricing increasing so much I might suggest:

- a. Population increase
- b. Wollongong prices following those of Sydney
- c. Higher standards and bigger units
- d. High density requiring lifts and increases strata fees
- e. Housing being seen as a great investment resulting in higher returns in the long term

With record low interest rates, hopefully housing price increases will significantly decrease.

To look at affordable housing, suggestions that a percentage of units in new buildings should be given to community housing for low income people whilst it has merits, my fear is that it will mean people buying units will have to pay more for their units and so I question this.

I believe stopping increases in housing is the only real solution, but how it can be achieved is the problem. Additionally, I believe "walk up 3 storey units" are more affordable as strata levies are increased about \$30-50 per week to cover costs of lifts and thus increases costs for renters – this is reflected in rental prices.

Finally, the Discussion Paper is so lengthy and complicated, I fear very few people will read it and make a submission.

Housing Trust

The intention and findings of the Draft Housing and Affordable Housing Options Paper (the Options Paper) are of



considerable value. Housing Trust congratulates Wollongong City Council on the release of the Options Paper and, in particular, recognising that the severe shortage of affordable rental housing is one of the greatest economic and social challenges in the Wollongong LGA.

Council has a vital role to play in the development of affordable housing. In addition to strategies such as inclusionary zoning and voluntary planning agreements (VPAs), Housing Trust encourages Council to commit to the full range of mechanisms available to Local Government to directly influence the supply of affordable housing.

Housing Trust commissioned an expert review of the Options Paper by Judith Stubbs & Associates to help inform our assessment of the strategies being proposed. That assessment includes detailed calculations of current and projected affordable rental need utilising data from the 2016 Census, Illawarra Shoalhaven Regional Plan 2016 (ISRP) and the Department of Planning Industry and Environment (DPIE) 2019 as summarised below.

Current Affordable Housing Need (households in rental stress)	
Very low income	4,942
Low income	2,650
Moderate income	2,040
Total	9,633
(JSA, 2020)	'

This data differs from Council's calculation of 8,356.

The following table provides projections for additional rental stress, i.e. affordable housing need from 2016 to 2035 using two sets of dwellings assumptions.

Projected Affordable Housing Need 2016 – 2036 (households in rental stress)		
	ISRP (assumes 14,600 additional dwellings)	DPIE (assumes 23,800 additional dwellings)
Very low income	860	1402
Low income	461	750

Total	1,676	2,732
Moderate income	355	579

(JSA, 2020)2

It is also important to distinguish between income groups and their housing priorities as this will impact Council's strategic planning.

The JSA report highlights material issues with Council's data selection and analysis. This has a direct impact on the overall findings and recommendations. Housing Trust has made detailed representation to Council about these issues and recommends revision prior to finalisation of the report.

The main risk to Council in not addressing these issues is:

- . Underestimation of the need and therefore a failure to implement the range and level of interventions required
- Reliance on strategies which may have little or no impact, notably diversification, and
- Inadequate focus on the needs of very low to low income households that require Local and State Government
 interventions as other income target groups may have their needs met by the market.

At the time of writing the full impact of the COVID-19 pandemic is unknown. Early indicators suggest that although there may be some short-term easing of rents in the Wollongong LGA the number of people in housing stress and therefore in need of affordable housing will increase significantly.

Housing Trust welcomes the opportunity to provide feedback on the Options Paper. A summary of key recommendations follows and specific comments are made in relation to each of the strategies.

PriorityRecommendations

Wollongong City Council can, and should, be a leader in the design and delivery of world class solutions to the affordable housing crisis.

The range of strategies proposed in Council's Paper including undertaking further reviews to passive and strong interventions all need to be assessed for their impact on each of the three household income groups: very low, low and moderate.

Housing Trust does not consider more reviews or extensive information is required before committing to a plan of action. Substantial literature, including the plans being implemented in other LGAs, is readily available. This can be used to expedite the development and adoption of precinct specific plans across Wollongong.

The strongest strategies, and therefore the ones most likely to have an impact, are those directed at;

- improving the planning system;
- creating partnerships; and
- delivering funding through the provision of land and reduced fees. Our key recommendations are outlined below:
- It is imperative that Council sets targets for affordable rental housing and this should be elevated from a Medium to
 High priority. Targets are essential to monitor progress and enable accountability. Given the nature and extent of
 housing stress in the Wollongong LGA a target of 20% of all new dwellings (between 2,092 and 4,760) is required to be
 allocated to affordable rental housing to 2036 (WCC Recommendation 4.4)
- An audit of under-utilised Council land and a 35 year leasehold or title transfer strategy should be completed by June 2021 with the land to be developed for affordable rental housing. This is likely to be one of the most effective strategies for addressing the unmet need in the area. (WCC Recommendation 3.9)

Housing Trust was established by the Illawarra Councils and operated with an MOU which facilitated collaboration and enabled the sharing of resources. Housing Trust would like an updated agreement in place by December 2020.

- Housing Trust proposes developing a process to work directly with Council on the renewal of LaHC owned land to
 ensure DCP and LEPs optimise density and improves livability and community amenity. (WCC Recommendation
 3.5)
- Housing Trust recommends automatic waving of s.94 fees for all social and affordable developments and welcomes the
 reforms to the planning and development approval processes being introduced by the NSW Government. (WCC
 Recommendation 3.5)
- Voluntary Planning Agreement (VPAs) should be maximised for their potential to make a substantial contribution to
 affordable rental housing. There is significantly more potential in VPAs such as that being considered for the Corrimal
 Coke Works development where, despite the scale of the development and rezoning, only 5% is being proposed for
 affordable rental housing. We recommend a presumption of 20% inclusionary zoning for all VPAs with site specific
 variations considered by exception. The delivery mechanisms can include 'whole lot take-out' and 'salt and peppering'
 with the early involvement of the Housing Trust able to inform and facilitate the project design and feasibility. (WCC
 Recommendation 3.4)
- Housing Trust is supportive of Council's strategy to implement an affordable contributions scheme under SEPP 70.
 This is an important contribution to the development of affordable housing for Wollongong. (WCC Recommendation 3.2)



- Due to the severity of the affordability rental crisis in Wollongong, Housing Trust recommends a SEPP 70 contributions scheme of 20%. The impact of a contributions scheme will be constrained by the availability of land with significant uplift potential and the land value. This will limit the precincts in which it is likely to be applied and therefore the amount of housing that can be produced. (WCC Recommendation 3.2)
- Appropriate and robust data is essential to underpin the strategies set out in Council's Paper. Housing Trust has made
 detailed representation on this matter, and again encourage Council to ensure its data is accurate, particularly the
 statutory benchmarks used and the distinct needs of each of the three target income groups, in order to meet the
 requirements of DPIE. (WCC Recommendation 3.1)
- Housing Trust recommends the establishment of an Affordable Housing Reference Group of Council, industry leaders, Housing Trust, and planning experts, to oversee the finalisation and implementation of the strategies with particular emphasis on revising the DCP and LEP.

DetailedResponseKeyRecommendations

Housing Trust recognises that a continuum of housing is necessary and many of the strategies below will benefit both home buyers and renters, our focus for the purpose of this review is on affordable rental.

1. Increase Housing Stock Diversity

Our findings indicate that although increasing housing stock diversity will provide benefit to moderate income earners it does little to achieve affordability for very low and low income households. By far the most serious affordable housing need in the Wollongong LGA is experienced by very low and low income renting households.

1.1 & 1.2 - Housing Trust supports an increase in housing diversity, however we note it will only improve rental affordability for smaller, moderate income households.

More than 70% of projected housing need is likely to be among very low and low income rental households. Simply increasing diversity will do little to support these households. Additional mechanisms and approaches are required and we commend Council's intention to implement SEPP 70, VPAs, identifying under- utilised government land, and affordable housing uplift and renewal of existing LaHC sites.

Council should amend the DCP and LEP controls to facilitate diversity and also vary requirements such as car parking provisions, apartment size and number of bathrooms. These controls can positively impact affordability for buyers and renters.

Council should increase the proportion of smaller units (e.g., studios) as part of developments, particularly those with

good access to transport and other services.

- 1.3 Engaging the community on the preparation of local character statements is essential and should include targeted communication with social and community housing providers and residents. Housing Trust would welcome the opportunity to work with Council to ensure effective engagement with our tenants and neighbouring residents. All place making strategies should explicitly reference affordability and how it will be achieved
- 1.4 Adaptable housing is an important element of diversity. Housing Trust supports planning controls to increase the provision of Silver Liveability Housing (at a minimum) across the LGA. Preferred locations will have good access to public transport and services.
 - Housing Trust would welcome the opportunity to provide further input into specific design principles such as dual-key apartments, floorplans, fixtures and fittings that optimise affordable liveability for tenants. Council should note LaHC is currently revising the design principles and specifications for their buildings.
- 1.5 Notwithstanding the limited merit of diversity as means of improving affordability, Housing Trust recommends Council adopts best practice to ensure well designed and located manor houses and new generation boarding houses are included in the housing mix.
 - The State Government's Low Rise Medium Density Housing Code commenced on 1 July 2020 and presents an opportunity for Council.
- 1.6- As above, Fonzie Flats provide variety in housing choice however cost and control measures will be required if this strategy is to favourably impact affordability.

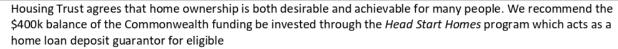
2- Plan for Future Housing Growth

Housing Trust welcomes evidenced based housing growth strategies that enhance individual and community life, environmental sustainability and economic security.

- 2.1 Housing Trust would welcome the opportunity to partner with Council to ensure the needs of very low, low and moderate incomes households are considered.
 - We recommend the establishment of a Reference Group of industry leaders to advise and support Council in development of these strategies.
 - Detailed planning should only occur once Council has collated and analysed appropriate data and consulted further on its (Final) Housing and Affordable Housing Options Paper.
 - In addition to constraints and built form analyses, it is critical that growth is supported by social needs analysis to

ensure future communities have access to necessary infrastructure and services.

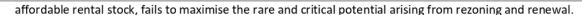
- 2.2 Housing Trust supports appropriately planned and managed growth in the LGA.
- 2.3 Housing Trust supports appropriately planned and managed growth in the City Centre.
- 2.4 Housing Trust strongly supports this approach. It is imperative that Council's LSPS reflects the final strategies arising from the feedback to this Options Paper so that future strategic planning responds to the housing needs and challenges facing the LGA. Housing Trust expects that the LSPS will provide further detail and guidance on a number of the critical issues raised in the Options Paper.
- 2.5 Housing Trust supports this strategy. The planning and management of employment lands is important to ensure a robust economy, with sustainable employment close to where people live.
 - Council should ensure all rezoning and uplift opportunities contribute to an increase in affordable rental housing through VPAs and/or the contribution scheme once operational. A target of 20% is required.
- 3 Increase the Supply of Affordable Housing
 - Housing Trust's own research indicates that the demand for affordable housing in the Wollongong area is growing. Around 9,650 very low, low and moderate income households are in rental stress. Just over half of the dwellings required (52%) are for smaller households and the balance suited to families with children.
- 3.1 Housing Trust supports the expedition of this Policy, in consultation with relevant stakeholders
- 3.2 Housing Trust continues to support Council's plan for an affordable housing Contribution Scheme under SEPP 70. This will make a contribution however the impact in real terms, will be limited.
 - It is imperative that the Scheme is based on appropriate and robust data. Housing Trust has made detailed representation to Council on this matter, and we again encourage Council to ensure its data, and particularly the statutory benchmarks used to establish the need for affordable housing, meets the requirements of DPIE.
 - Housing Trust notes that current areas identified for growth in the LGA are unlikely to have suitable land values and or density controls needed to optimise uplift.
- 3.3 Housing Trust congratulates Council on the partial completion of part (A) of this strategy, that is, the award of a \$4.3 grant from the \$5.2m available.
 - We recommend an immediate repeat of the 2019 EOI process to award further grant/s totalling \$5.7m to build affordable rental housing and that the target criteria for tenants be broadened.



Affordable Housing tenants. In turn this also makes their affordable rental home available to another tenant.

- 3.4 Housing Trust believes this is essential to the successful implementation of a SEPP 70 Affordable Housing Contributions Scheme and Plan. We encourage Council to conduct an audit to identify sites where uplift is achievable through changes to the floor space ratios, height and other design elements such as parking and the number of bathrooms.
 - VPAs should prioritise the delivery of affordable rental housing along with the other benefits such as infrastructure, open space or heritage protection. Housing Trust asserts there is significantly more potential in recent VPAs including the Corrimal Coke Works project which contemplates only 5% affordable rental housing.
 - Involving Housing Trust in the early stages of these developments could assist feasibility due to our ability to access low-interest loans, grants and other benefits.
- 3.5 Housing Trust considers this is a high priority as it will deliver more, better quality housing and community outcomes. LaHC's (consultation draft) *Policy on CHP-led Redevelopment of Social and Affordable Housing on LaHC-owned Land* dated 5 June 2020 is commendable.
 - Housing Trust believes Council has an important role to play in the execution of this strategy by reviewing the planning controls on specific sites to allow for increases in density and fast, collaborative Development Approvals. We also recommend that Council amends their reference to social housing management in the Final paper to
- recognise the management by Community Housing Providers such as Housing Trust.

 3.6 Housing Trust supports this approach.
 - We recommend the establishment of a Reference Group of industry leaders, including HT, to advise and work with Council on changes to the LEP and DCP.
 - It is noted that the *Environmental Planning and Assessment Act 1979* includes provision of Affordable Housing as one of its Objects and it is appropriate that Council's planning documents reflect this.
- 3.7 Housing Trust supports this recommendation and suggests that Council undertakes an assessment of the precincts or localities where such strategies are likely to be effective due to land value uplift and seek contributions of 20% Housing Trust believes that recent VPAs such as the Corrimal Coke Works project, which only contemplates 5%



- 3.8 Housing Trust strongly supports this strategy.
 - Affordable rental housing developments should automatically be exempt from s.94 fees and discounts applied on a pro rata basis according the affordable component in mixed tenure projects.
 - The reduction in parking requirements and other incentives can be addressed by revising the DCP and LEP regulations.
- 3.9 This is likely to be one of the most effective strategies for addressing the unmet affordable rental housing need in the Wollongong LGA. Housing Trust strongly supports this strategy and considers it a High priority.
 - We recommend Council undertake an audit to identify land that would be suitable for affordable redevelopment. Council could retain the asset and provide 35-49 year peppercorn leases to not-for-profit, Community Housing Providers like HT.
 - Land title transfers, as conducted by NSW Government in return for the delivery of affordable rental housing, should also be considered.
 - Housing Trust would like to continue our long standing partnership with Council and requests an updated MOU to reflect current objectives, community need and circumstances.
- 3.10 Housing Trust unequivocally offers our expertise, research and communications support to Council to achieve this strategy.
 - We would welcome the opportunity to be involved and can play an integral role in enhancing the social and community outcomes, design quality, liveability and financial feasibility of projects. Community Housing Providers are major contributors to the State's residential construction industry having invested \$1.2 billion in housing supply from 2012 to 2020.
- 3.11 Housing Trust strongly support this approach.
 - Housing Trust offers our expertise, research and communications support to Council and the Illawarra Shoalhaven Joint Organisation to develop and set achievable targets.
- 3.12 Housing Trust supports an evaluation and has a vital role to play in the implementation of this policy in the Wollongong LGA.
- 3.13 Housing Trust welcome's collaboration with Council on the development of innovative housing models based

Item 4 - Attachment 2 - Feedback on Draft Strategies Presented in Option Paper

on best practice and living examples.

3.14 As a long term partner of WCC we would be pleased and proud to assist Council with multi-channel communication strategies and community engagement wherever possible.

Housing Trust has provided Council with a short film supporting the need for affordable housing in the Wollongong LGA as a part of the exhibition of the Options Paper. We encourage Council to continue to use this video in the future.

4. Monitor Housing Supply

Housing Trust supports Council's intention to monitor delivery of its housing strategy. This is critical for monitoring and accountability of the strategy's implementation.

- 4.1 The Final plan needs to include targets and then monitoring progress is critical. Housing Trust is supportive of this recommendation.
- 4.2 Housing Trust supports this approach to ensure communities have access to the appropriate services.
- 4.3 We strongly recommend Council review their data sources with particular emphasis on setting defensible targets and objectively assess the impact on the strategies set out in the Options Paper.
- 4.4 Housing Trust considers it essential to have targets and that the priority for this strategy is elevated to High. We recommend the target be set at the projected (additional) affordable housing need rather than current need plus the projected increase as this would be unrealistic and limit the adoption and success of this strategy.
 Research, reported separately, indicates the total affordable rental housing dwellings needed by 2036 is between 13,450 and 15,200. This means that 20% of additional dwellings projected under the DPIE or ISRP need to be affordable.
 Without targets, monitoring and evaluation it will be impossible to estimate, in a timely manner, the extent to which any
- 4.5 Housing Trust strongly supports this recommendation. We welcome the assistance of WCC in achieving our own plans for growth in order to meet the growing demand for affordable rental housing.

5 Continuous Improvement of planning controls

of the strategies are effective.

Housing Trust recommends Council undertake detailed assessment of precincts or localities where Voluntary Planning Agreements and an Affordable Contributions Scheme are likely to be effective due to the potential for land value uplift and where variations to controls could be supported. For these schemes to be effective Council would need to undertake rezoning and major changes to controls, such as a significant increase in height where land values are

	sufficient to sustain this.
	5.1 Housing Trust looks forward to being involved in consultation activities to develop a Vision for Housing for Wollongong.
	5.2 We recommend this is considered within the scope of an Industry Reference Group.
	5.3 All such proposals represent significant opportunities to contribute to the health, wellbeing and economic outcomes of the City through the delivery of affordable purchase and rental housing.
	5.4 Housing Trust supports the streamlining, standardisation and prompt determination of development application as a means of improving community and industry confidence. We support the implementation of controls which address housing need and contribute to place making outcomes and improved amenity for all residents.
	5.5 We recommend this is considered within the scope of an Industry Reference Group.
	5.6 Housing Trust supports further investigation into the rezoning of precincts and localities where there is potential land value uplift to support the viability of an Affordable Contribution Scheme.
	5.7 Council should expand the precincts included in this review to include areas where there is likely to be more affordable housing as a result of increased density.
	5.8 Housing Trust broadly supports the review of zoning but notes the land affordability north of Thirroul limits the potential for affordable housing without an increase in density, especially in locations close to the railway stations.
UDIA	UDIA acknowledges the critical need for more market housing and affordable housing in the Wollongong local government area - one of the least affordable housing markets in Australia. We commend Wollongong City Council for addressing this issue through the Paper because Council policies play a significant role in addressing affordability.
	However, there are also other critical ways Council can address housing affordability. For example:
	- The local infrastructure contributions paid by developers under the West Dapto Contributions Plan are currently the highes in NSW, adding more than \$50,000 to the price of a new home.
	- The draft Wollongong City Centre Urban Design Framework proposes to prohibit residential development in some parts of the city centre, which would likely constrain apartment supply and put upward pressure on pricing.
	- Faster rezonings and DA determinations would significantly reduce the holding costs associated with residential
	developments, with savings reflected in the price of new homes.

UDIA believes that applying an Affordable Housing Contributions Scheme under SEPP 70 in the Wollongong LGA (without providing additional incentives or upzoning) would increase the cost base of market housing. This would add to the pressure on housing affordability, rather than improve it.

UDIA supports an incentive-based approach to promote the development of Affordable Housing while also focussing on increasing supply for market housing, which will ease affordability pressures for everyone.

Where Council wants to pursue non-market objectives such as Affordable Housing, it is critical Council incentivises the market or compensates the market for the cost of these objectives. Otherwise, the contribution is simply an additional tax on a site without any commensurate increase in site value. This leaves the developer with two options:

- Pass the additional tax on to buyers of market housing
- Not proceed with development as it is unfeasible.

Therefore, it is critical where any additional costs such as providing or contributing to Affordable Housing are retrofitted they are compensated through other means. Otherwise, new home buyers are paying increased prices either through costs passed on, or insufficient new housing supply.

Recommendation 1: Council should not introduce an Affordable Housing Contributions Scheme unless it is accompanied by increased yields or other incentives in the LEP that would offset the cost of the contribution.

UDIA also notes that Affordable Housing cannot be entirely market-led, as the whole spectrum of the housing continuum cannot be delivered by the market - there also

needs to be government-led components.

The Paper has correctly identified that uptake of diverse housing types is one of the key issues in addressing housing affordability. UDIA believes Council controls and policies are preventing adequate uptake of:

- Multi dwelling housing
- Smaller lots
- Apartments

Multi-dwelling Housing

The Paper notes that only around 20% of R3 Medium Density zoned land in the LGA contains medium density housing types. Despite the high potential returns available to investors in this type of development, the uptake by the industry is very low.

UDIA believes that the current development controls are a major hindrance to developing medium density housing in the Wollongong LGA. Some of the main issues are:

Parkina

The parking rates required for multi-dwelling housing in the Wollongong LGA are too high and do not reflect modern vehicle usage rates in metropolitan centres like Wollongong. Our initial analysis suggests additional parking spaces add approximately \$20,000 to the price of a new home. UDIA recommends Council adopt a minimum requirement of one (1) space per dwelling for multi-unit housing. This is the rate adopted in other areas of NSW with similar development rates, including Campbelltown and Newcastle.

We also encourage Council to accept zero parking provision based on a case-by-case merit assessment in some areas of Wollongong with high levels of accessibility and public transport access.

Recommendation 2: Council should change the parking requirement for multi-dwelling housing to a minimum of one space per dwelling (regardless of size), with no parking required in some well-serviced and accessible locations based on merit.

Minimum Lot Widths

The current requirement of 18 metre minimum lot width for multi-dwelling housing is stopping many lots in the Wollongong LGA from being eligible for this housing type. Many lots were subdivided based on a 50- foot (15.24 metre) historic standard. UDIA notes that a 15 metre minimum lot width has been successfully applied to multi-dwelling housing in other jurisdictions, such as the Brisbane City Council Dwelling Code. 15 metres allows a front dwelling entry and garage (or two dwelling entrances without front garages) plus driveway and side setback/landscaping. Retaining the existing setback requirements in the DCP would ensure amenity is maintained.

Recommendation 3: Council should change the minimum lot width for multi-dwelling housing to 15 metres.

Tree Retention

Our understanding is that Council's interpretation of vegetation management and tree retention requirements in the Wollongong DCP is inconsistent between development applications. We encourage Council to clarify its interpretation of these policies in the context of multi-dwelling housing. If Council is to encourage medium density housing, it must acknowledge that trees that were planted in a low-density residential context may no longer be appropriate for the desired future medium density character.

Recommendation 4: Council should clarify its approach to tree retention in neighbourhoods it wishes to see transition from low density residential to medium density residential.



UDIA notes that these are just some of the issues with the detailed development controls for medium density housing in Wollongong. We are very keen to work with Council on addressing these issues in more detail to ensure that medium density development has high amenity and is also feasible to deliver.

Smaller Lots

UDIA acknowledges that minimum lot sizes of 300m2 have been supported in some greenfield areas. However, the predominant minimum lot size across greenfield areas in Wollongong continues to be 450m2. This is significantly higher than the minimum lot sizes in Sydney's Growth Centres. As a general rule, each additional square metre adds \$1000 to the price of a lot, so any further reduction in the minimum lot size would improve affordability.

Small lot housing is also desirable for downsizers looking for low maintenance and high accessibility. As the Wollongong population ages, there will be more demand for small lot single storey housing. By encouraging downsizing, Council would also encourage the release of existing larger housing stock for redevelopment into a more diverse range of housing.

Recommendation 5: Council should steadily reduce the average lot size across greenfield areas of Wollongong over time to reflect changing market demand and affordability.

It is also important that Council ensures its minimum lot size requirements align with the Low Rise Housing Diversity Code and Greenfield Housing Code to allow as many homes as possible to be built through the complying development process. The significant reductions in time and increase in investment certainty from the CDC process would reduce the cost of a new home and increase supply.

Apartments

The Paper notes that affordability can be addressed in part by a diverse supply of housing, including apartments. Wollongong has undergone a recent boom in apartment supply, however this has occurred to address unmet existing demand rather than speculative new supply. There will continue to be strong demand for apartments and encouraging further supply will help to ensure they are affordable.

UDIA has made a detailed submission on the Wollongong City Centre Urban Design Framework. We support some of the proposed changes such as the removal of the ground floor commercial/retail requirement for apartment buildings. However, we do not support commercial-only precincts or further restrictions and design requirements for apartments.

In addition, UDIA believes the Paper should address several issues with apartment supply in Wollongong, including:

- Application of the Apartment Design Guide
- Basement parking requirements

	- Minimum lot widths
	Application of the Apartment Design Guide
	The Apartment Design Guide is a guidance document to support SEPP 65 developments. UDIA is concerned that it is being applied too rigidly across NSW, including in Wollongong. We note the Minister for Planning is currently reviewing the ADG as well as other design guidance and we encourage Council to apply the ADG as a guidance document with discretion to support good design outcomes.
	Recommendation 6: Council should apply the Apartment Design Guide with discretion to support good design outcomes.
	Basement parking
	Many areas of the Wollongong City Centre have geological conditions that make the provision of basement parking levels difficult and expensive. UDIA members report that in some cases Council has not supported alternatives to basement parking to address this issue. UDIA encourages Council to support alternative approaches to parking including above ground parking levels, off-site parking provision, or contributions to public parking provision in lieu of parking within the development.
	Recommendation 7: Council should support alternative approaches to parking for residential flat buildings other than basement parking.
	The current requirement of 24 metre minimum lot width for residential flat buildings is stopping many sites in the Wollongong LGA from being eligible for this housing type. UDIA notes that a 20 metre minimum lot width has been successfully applied to residential flat buildings in other jurisdictions, such as the Brisbane City Council Dwelling Code. Retaining the existing setback requirements in the DCP would ensure amenity is maintained.
	Recommendation 8: Council should change the minimum lot width for residential flat buildings to 20 metres.
WaterNSW	Almost half of the LGA (in the west) falls within the Sydney Drinking Catchment (SDWC). Most of this land forms part of the Woronora and Metropolitan Special Areas (inner catchment areas), which are managed to protect the water quality of key reservoirs. Most, but not all, of this land is owned and managed by Water NSW or in National Park estate. The Special Areas are designated Schedule 1 land under the <i>Water NSW Act 2014</i> and Regulation 2013 where public access is prohibited.
	WaterNSW has responsibilities for protecting water quality in the SDWC through planning instruments such as the Section 9.1 Direction 5.2 Sydney Drinking Water Catchment and State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011 (the SEPP). The latter requires all new development in the SDWC to have a neutral or beneficial effect on water quality.
	The SEPP applies to private land within the LGA that lies within the SDWC, this being mainly limited to areas in Darkes Forest and a small area of land in the west of Maddens Plains. The private land areas of Darkes Forest and Maddens Plains that lie

within the SDWC are mostly zoned E3 Environmental Management. These lands are also designated 'Special Area' although environmental controls are limited for private land.

We note that Darkes Forest and Maddens Plains are not specifically mentioned in the Options Paper. Similarly, the Options Paper does not directly mention semi-rural or rural residential development. The Options Paper would benefit by clearly indicating that it is not addressing rural residential development or its intensification, or otherwise explain that rural residential development is beyond the scope of the Paper (if this is the case). WaterNSW is generally not supportive of development intensification (such as housing) on Special Area Schedule 1 private lands.

The Options Paper would benefit by mentioning that the western half of the LGA is designated Special Area within the SDWC, occurring largely within land owned and managed by WaterNSW or as National Park estate. These lands are therefore unsuitable for housing.

We support the Options Paper's consideration of watercourses, riparian lands, wetlands, flood-prone lands and steep slopes as environmental constraints to current and future housing, and the importance of riparian land for water quality protection (pp. 53-54). We also note that the paper addresses water and sewer reticulation on page 69. We note and support the Paper's recognition that the Illawarra is supplied by WaterNSW's Avon Dam. This section would benefit by identifying which areas of the LGA are sewered and which are not, and including a corresponding map for the LGA. This would help identify where sewerage infrastructure, or lack thereof, acts as a constraint for future housing expansion.

The Options Paper may benefit by providing greater recognition of stormwater management and water sensitive urban design initiatives to promote water re-use, retention, and reduce localised flooding impacts and risk. This would include recognising the need to counterbalance housing demand with urban designs that promote permeable surfaces, open space, tree canopy cover and other initiatives for urban cooling and retaining water in the landscape. In this sense any draft Housing Strategy derived from the Options Paper would benefit by giving consideration to sustainability and environmental outcomes in concert with increasing housing options and affordability.

Property Council of Australia

The Property Council supports the initiative by Wollongong City Council to develop an options paper which invites feedback from stakeholders and will input into a more detailed housing strategy to address the housing needs for the Wollongong local government area.

Ensuring that we have the right mix of housing available to people who live in our local communities is vital, and the whole industry has a role to play in achieving this. We encourage council to continue working collaboratively with the industry to develop and implement the housing strategy and our members look forward to being part of this process.

Overview



We appreciate the opportunity to provide feedback and input into this options paper and support many of the priorities identified and look forward to continuing our work with council in ensuring we have the right policy and planning tools available to deliver affordable housing in our local communities. Overall, the whole industry has a role to play in achieving these goals and it is important that council continue to work collaboratively with the industry to develop and implement the housing strategy.

Overall, there are a few factors we believe do need to be addressed in the development of the housing strategy and these include:

- The paper appropriately recognises the greatest need is for affordable rental housing and the strategies need to clearly target these groups from those seeking affordable purchase.
- It is important to distinguish between the capability of the private market providers and the affordable housing providers (Government and Community Housing Providers. These groups have different needs and outcomes, and we have considered both groups in our response to your recommendations below).
- Housing need varies considerably across the three Affordable Housing Income groups very low, low and moderate. The impact of the strategies, and role of the market and other providers, should reflect these differences.
- We have some concerns around the data used and presented within this report, the data is outdated and four years old and with concrete data sources lacking to support some of the statements made within this paper. We would encourage council to update and correct their data sources and ensuring that any options considered are supported with an evidence base.
- Data around property values and income levels should also be considered more closely in the development of the housing strategy and identifying appropriate actions. In the Wollongong LGA, we have high property values and lower income levels compared to Sydney for example and this also needs to be examined.
- There are various overarching statements within the paper, and we encourage council to provide more specific precinct-based responses and priorities for housing for different areas. With the Wollongong LGA covering such a large geographical area, with very different needs across various suburbs from north to south, local centres and precincts it is important to be specific on the actions outlined.

1. Increasing Housing Stock Diversity

Property Council is generally supportive of the priorities and recommendations outlined within these recommendations. We believe these actions may contribute to addressing the issue for some households, but it is important to note that it won't

within local communities.



necessarily 'solve' the issue. However, taking practical steps to allow more flexibility and adaptability through the Wollongong DCP with a particular focus on growth around town and village centres as outlined in the options paper is vital. Investigating options to increase the proportion of new dwellings and smaller more affordable product for purchase is a step in the right direction, this is important for infill areas but also in relation to greenfield areas where there is a lack of smaller stock. The availability of housing such as manor houses and fonzie flats will contribute to increasing the housing diversity stock and we commend council on their willingness to explore this further and recognising the benefits of this type of housing

Smaller, more affordable product not only assists with purchase but also in providing further options for rental – with more students living in the city, more flexible and adaptable housing would be beneficial. However, this is beneficial not only to address the needs of students, there are all types of people who would benefit from access to other types of housing such as fonzie flats as it provides another housing alternative compared to a single dwelling, apartment or other type of housing option.

It is important to note that increasing the diversity of housing stock will not, on its own, make the housing more affordable for renters. Other interventions including the allocation for government land and collaboration with LAHC and community housing providers to renew and increase the density of their existing stock is essential.

This discussion is also relevant for our seniors. As the population changes and as we plan for our ageing population we need to ensure there is a wide choice of housing options available and designed to meet the specific needs of older people in our local communities. For example, new and/or refurbished homes for seniors designed to facilitate a range of aged care support services provided to people in their own homes. This may include smaller and fully accessible dwellings at ground level close to services and town centres as identified within the paper. With supply very limited in this space, council should investigate how its planning controls can be amended to provide more flexibility and opportunities suitable for seniors housing and in-home services, particularly when the Commonwealth Government is promoting and increasing funding to ageing in place via home care services and packages.

The delivery of housing stock at a smaller size with more flexibility and at a more affordable point of purchase is important, but this does not come without its challenges, especially if there isn't support for this type of housing in the DCP. A DCP review is essential and we encourage council to undertake a review together with industry, to consider feasibility of these options and gain feedback from the industry before making decisions about how the planning controls are set out in the DCP.

Council has an important role in considering feasibility as part of their planning process and should take accountability together with industry to ensure that these housing options work and are supported.



It would be great to initiate a taskforce with council, community housing providers, the development industry and other expert practitioners to look at this holistically and work together collaboratively to consider the things that aren't working, what needs to change, set targets and trial solutions. We strongly recommend council consider practical steps such as this to bring positive change and ultimately achieve the priorities and actions as outlined in this paper.

2. Plan for Future Growth

Property Council is generally supportive of the priorities and associated actions outline with regards to planning for future housing growth. We agree with the need to define urban growth areas and precincts across the region and consider how these areas can support growth and increased density.

It is important to note that since the release of this paper, the NSW Government has implemented the Low Rise Medium Density Housing Code from 1 July which means council should be looking at how it can encourage this type of development through its updated planning controls. The code acts as a strong tool to reduce the number of applications coming to council and fast-tracking dwellings in the 'missing middle', producing a number of benefits within the community. This is a good opportunity for council to allocate any additional resources to larger projects which bring investment, jobs and economic development.

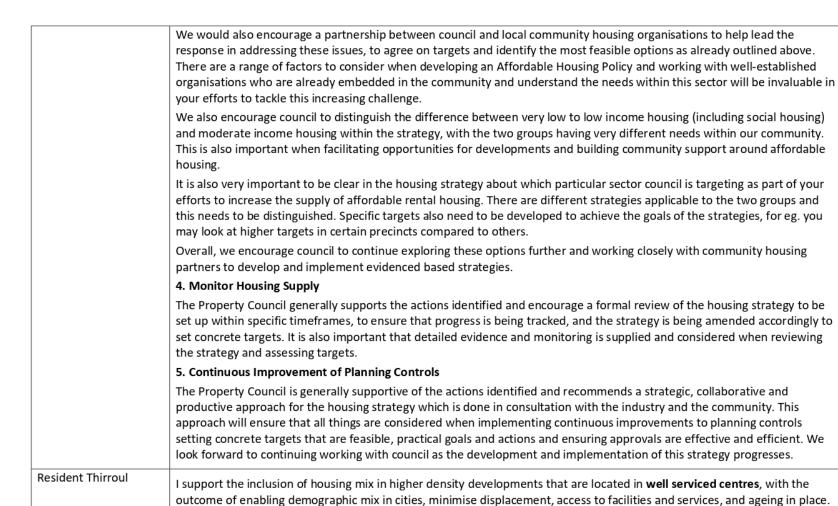
The council has taken an approach that complying development and the now called 'low-rise housing diversity code' will be an issue across the LGA, but there has not been any key actions implemented by council in the LEPs to address this. We understand that further change may come out of this process, and some of the recommendations around the R3 zone might be appropriate. More work needs to be done to encourage this type of housing in certain areas.

It is also important to note that it will take some time for the development industry to transition to the code and we expect the rate of take up to be gradual, with strict design controls and criteria in place to ensure developments meet requirements. This type of housing fills a gap in which can be beneficial for the community and provide diverse housing stock especially in areas identified as growth areas.

3. Increase Supply of Affordable Rental Housing

Property Council commends council for recognising this very important issue and outlining a number of priorities to address this challenge, and we are supportive of the actions identified.

From a Property Council perspective, we reserve our position on any proposal to implement a scheme under SEPP 70 until we see more detail as to how this will play out and there should be consultation with the industry as this progresses, as viability will be an issue so we look forward to further work in this space.



However, the basis for my comments are heavily effected by the fact that I am a longstanding resident of an area that has continued to experience increased infill development despite being geographically constrained in its ability to respond with appropriate infrastructure.

I do not support any increase in densities anywhere north of Point Street, Bulli. Ideally, I would request a down zoning, and removal of the ability for landowners to subdivide, and a reduction in the minimum lot size, but realise the limitations of the ability for Council to do this under the existing state planning system.

The northern suburbs are in crisis. Decades of infill development has gradually eroded the liveability and accessibility for both residents and visitors. The traffic network is already failing with limited capacity to deal with every day traffic flows let alone traffic in peak periods, holiday periods or at times of emergencies. Residents are no longer able to access everyday services due to the complete gridlock on our road network especially on weekends. This will only worsen with increased residential development in greenfield areas to our west, outside of our LGA – there is no doubt the 40,000 new residents at Wilton will want to spend hot Saturdays in summer at Austinmer beach.

I do not support Thirroul being identified in the Illawarra Regional Strategy as a centre for increased housing activity. Until a solution for the traffic congestion is realised, the timing of this is inappropriate. There are other centres within the LGA which would benefit with increased densities and the benefits of increased passive surveillance, increased night time activities, revitalisation and gentrification – Corrimal, the precinct surrounding North Wollongong train station, Port Kembla Fairy Meadow, Dapto – these centres are well serviced with multiple roads and a train station.

Furthermore, Thirroul's role as the gateway to the northern suburbs and as a tourist destination, in my opinion, warrants further protection from increased density to maintain its village lifestyle appeal.

My comments specifically with regard to the Options paper are:

- I agree with Council's statement about Thirroul and infrastructure constraints in the Northern Suburbs (pg.68). The
 Northern Suburbs has seen a "death by one thousand cuts" through slow density increases over time, mainly through
 residential subdivision. This has compounded the strain on the road network, and is now a safety and emergency response
 hazard. The community does not want a freeway. Density is more appropriate in other areas that are less constrained, have
 infrastructure and would benefit from urban renewal.
- I support action 5.8 (pg. 102) to limit housing densities north of Thirroul
- Although not suggested in the document, I support a reduction in the minimum lot size in properties north of Thirroul.



Resident Corrimal	A) affordable and social housing need to have security of tenancy. Not having this adds extra stress to the tenants of any privately rented home, as having to move often is costly and very disruptive to life.
	B) no private landlords, but a Housing Corporation managing these homes or an organisation like Housing Trust.
	C) better options such as studios, one and two bedroom homes or apartments, with balconies, for smaller households.
	At all times, avoid building ugly tower blocks without balconies (such as are in the news in Melbourne at the moment, during the COVID crisis. To be in lockdown in your home, without at least a balcony to escape on during a pandemic, is an absolute nightmare).
	D). These homes need to be close to public transport and schools as the tenants invariably do not own a car, but still need to get to work, school and shops. And then they should not be on steep hills, as this also will trap a tenant without a car or with a disability, from participating in society.
	E) housing should be affordable for everyone and there should be enough houses for every person in our city. It is quite a disgrace for our wealthy society/country that we have people living on the street or in cars.
	F) perhaps increase our rates, so more houses can be build.
	G) Let us make Wollongong Australia's first city with enough homes for everyone, without housing stress, housing waiting lists, And homeless people. How proud will we be!
Illawarra Shoalhaven Local Health District	Promoting, protecting and maintaining health are key goals of the Illawarra Shoalhaven Local Health District (ISLHD). Housing is fundamental to human health. It affects many aspects of life, including personal and family wellbeing, mental and physical health, employment opportunities, social connectedness and environmental sustainability. Limited housing options can mean lower levels of social and economic participation and less access to healthcare and healthy environments.
	There is evidence and leading practice that identifies key issues that should be addressed in regards to housing and health. These are summarised in the attached appendix and provide context in reviewing ISLHD recommendations.
	The Draft Housing and Affordable Housing Options paper provides a unique opportunity to interpret the health aspirations of the community through effective housing strategies.
	ISLHD commends Wollongong Council on its comprehensive options paper which articulates well the current



housing situation and provides relevant and accessible information as to community needs.

ISLHD endorses the following elements of the options paper:

Item 4 - Attachment 2 - Feedback on Draft Strategies Presented in Option Paper

- Tackling affordable housing at a strategic level and identification of key planning priorities of increasing housing stock diversity, preparation for future housing growth and augmenting the supply of affordable rental housing.
- Utilisation of the NSW Government 'Local Housing Strategy Guideline' and progress toward meeting the recommendations charted in the relevant Local Housing Strategy Standard outline.
- Robust engagement of the community in developing a draft 'Vision for Housing'.
- Goal to ensure a diversity of housing by type, size and price points to respond to the variety of housing residents need with growth and change of population.
- Provision for providing suitable and adequate housing for people with limited mobility including Residential Aged Care, Seniors Independent Living, Liveable Housing
- Recommendation to adopt and implement an affordable rental housing target for Wollongong LGA in response to a large and growing issue of housing affordability and affordable housing.
- Acknowledgment that homelessness is a significant issue with a doubling of homeless population since 2011.
- Proposal to increase the supply of adaptable housing stock and increase the number of studio, 1 and 2 bedroom dwellings.
- Preparation of development controls in relation to new forms of housing that diversify housing stock e.g. Fonzie flats.
- Defining areas for urban growth around medium density residential zoned land, requiring adequate infrastructure and response to land and environmental constraints.
- Aim to investigate and then integrate planning and policy principles to promote development and protection of affordable rental housing into Council's LEP and DCP.
- Continuing to develop and implement an Affordable Housing Contribution Scheme for Wollongong LGA under SEPP 70.
- Realise partnerships that deliver affordable rental housing i.e. Community Housing Providers and the NSW Land and Housing Corporation
- Review of permissibility for residential housing types across R2 Low Density, R3 Medium Density, R1 General Residential, and business zoned land.



The Illawarra Shoalhaven Local Health District recommends the following be considered for inclusion in Draft Housing and Affordable Housing Options paper:

- Strengthen references to housing and health and the vital role it plays in the health of vulnerable communities.
 ISLHD would be happy to provide evidence to support this.
- Address planning priorities by undertaking further study of the needs for Aboriginal housing, housing for CALD
 communities and disability accommodation. Information and analysis of the needs of these groups would support
 the priorities.
- Clearly identify the partners council will work with to support affordable housing or access to housing. As no one sector is able to solve the housing affordability issue, government, builders and developers should aim to work together across the social, affordable and market housing sectors. This is especially for providers who work with the vulnerable populations identified in paper e.g. people living with disabilities, youth who are homeless.
- Advance tangible strategies in partnership with social hosing providers and developers to respond to the
 emerging gap between household size and dwelling size. A central strategy would be the need for an
 increase in development of one, two and three bedroom size housing stock.
- Actively work with NSW Land and Housing to renew and retrofit social housing and make the best use of existing stock/land. The NSW Land and Housing Corporation are administering the Communities Plus program focused on renewing the NSW Government's social housing portfolio to produce mixed tenure development. This would respond to the large and growing gap between the number of low-income households and private rental housing that is affordable.
- Allocate resources to investigate practical options for renewing Social Housing in Wollongong LGA and work with NSW Land and Housing Corporation to action these.
- Investigate the appropriate proportion of either adaptable or liveable housing stock required into the future so as to provide a realistic affordable rental housing target.
- Raise awareness with key partners as to the need to develop specialist housing. The Specialist Disability Accommodation market is emerging and will over the next few years create new dwellings for people with disability. The Specialist Disability Accommodation in Australia Report (March 2019) found a shortfall in specialist disability accommodation in the Illawarra of 93 places.
- Investigate ways to build in flexibility in council processes and guidelines to incentivise the provision of more housing choice (particularly 1 and 2 bedroom homes) and make it easier for builders and developers

	to do things differently (e.g. floor space ratios and car parking requirements). It is important to make sure
	that these deliver good design outcomes and more housing choice.
	 Council work to develop strategies to address energy efficiency for low-income households. A barrier is
	the gap in relevant and accessible information about the costs and benefits of upgrades to the home.
	 Commit to work with partners to secure funding to retro fit existing stock and maintain housing hardware
	especially in relation to energy and water efficiency. No single retrofit is suitable for application across all
	homes and retrofits should include installation of items such as solar hot water systems, door seals, working
	·
	windows, ceiling fans, insulation. • Ensure through approvals that affordable housing is within a reasonable walking distance (around 400 to 500).
	Ensure through approvais that arronausic housing is within a reasonable waiting distance (around 400 to 500
	metres) of shops, schools, public transport hubs, employment and other important community services and
	destinations to prevent car dependency. People on low incomes often do not own a car and/or struggle to run a car.
	 Maintain new affordable housing to demonstrate best practice design so as to be indistinguishable from other forms
	of housing and distributed throughout area/development instead of being concentrated in an identifiable cluster.
	 Work to include 'Greener Places' Premiers priority targets of access to open space and tree canopy when considering new housing stock locations.
	 Make sure well designed and appropriately located built and natural shade is planned for and budgeted
	appropriately in upgrades of existing housing stock and in plans for new stock especially for affordable housing.
	 Support investment in quality public spaces and amenities upfront (meeting places, parks, walkways, cycleways) to
	support more density and more housing choice. This encourages people to recognise that having a smaller home does not compromise quality of life.
	 Ensure higher density affordable housing facilities and spaces are designed to support an increase in the frequency
	and quality of social interactions which can enhance neighbourliness and community.
Illawarra Shoalhaven	Illawarra Shoalhaven Local Health District (ISLHD) appreciates the opportunity to comment on the options paper, with
Local Health District	particular reference to its impact on Wollongong Hospital and surrounding areas.
	We note in section 5.4.2 - SP1 Wollongong Hospital Precinct Zone that the recommendation of the Options Paper is to
	review the current SP1 zoning, with a view to introducing residential zoning to guide development of properties further
	away from the hospital. We also note the absence of specific objectives relating to the Hospital Precinct in the current Local Environment Plan.



Health Precinct

Wollongong Public Hospital is the major tertiary referral centre for the Illawarra Shoalhaven region, and provides the community with major employment and education opportunities. It is expected that demand for health services in the Illawarra Shoalhaven region will continue to increase into the future, driven by a growing and ageing population, and Wollongong Hospital will require significant expansion to accommodate this demand.

The Illawarra Shoalhaven Local Health District has been a participant in the Department of Planning, Industry and Environment's commissioned Metro Wollongong Precinct study. The concept of expanding a Health Precinct on the existing public and private hospital campuses and along Crown Street is supported by the study, capitalising on the existing significant investment in health infrastructure. As the anchor of the Health Precinct, the future expansion of Wollongong Hospital will play a key role in the realisation of the precinct concept.

The Health Precinct also provides opportunities for further collaboration between Wollongong Hospital, the University of Wollongong and the Illawarra Health and Medical Research Institute, to provide the region with the necessary skilled and trained health professionals for the future.

Zonal Master Plan

In 2013, the District commissioned a Strategic Zonal Master Plan to provide a high-level framework to inform future opportunities, and develop a number of options to ensure the Wollongong Hospital campus can respond to current and future needs.

The current site has very little un-built land and is bound by main roads and residential streets. This makes the hospital expansion zones quite challenging, and requires careful planning to ensure zoning of land supports the strategic aims of the Health Precinct and the hospital's ability to meet demand into the future.

We request that the Council includes the District in conversations about potential rezoning of lands surrounding the hospital, particularly Loftus street, New Dapto Road, Dudley Street and Darling Street.

We would also like to express our interest in meeting with the relevant representatives from the Council to share the findings from the Strategic Zonal Master Plan.

Heritage Solutions

This submission broadly addresses issues raised in Item 2 of the Ordinary Meeting of Council held on 16 March 2020 (Public Exhibition of Draft Housing and Affordable Housing Options Paper), commencing with Council Officer's

comments on the 'Low Rise Medium Density Code' and then offering some alternative solutions.

7.0 COUNCIL'S PAPER: HERITAGE SOLUTIONS' COMMENTS

7.1 Medium Density Alternatives

Although this has been, as noted, an ongoing concern for some 15 years, there have been little or no results 'on the ground' to date.

The fuller introduction of the 'Low Rise Medium Density Code', known colloquially as the 'Missing Middle', appears to have stimulated the present study.

7.2 Low Rise Medium Density Code or 'Missing Middle'

Council's stated concerns are as follows:

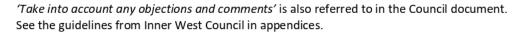
 a. 'It will allow private certifiers to assess complex development types (dual occupancies, manor homes and terrace houses)'

Comment:

- Council certifiers (who predominate numerically 4:1 in the Illawarra) will also be able to assess and approve these developments.
- These are no more 'complex' than a single dwelling and granny flat, i.e. there are the same B.C.A. requirements in both cases.
- b. 'There will be no neighbourhood notification or consultation (except just prior to consultation).'
 Comment:
 - The need to notify potentially affected landowners arose from the L.E.C. Commissioner's findings in 'Porter vs. Hornsby Shire Council (1988)' where it was held to be reasonable that potentially affected landowners be <u>notified</u> by Council and their comments (if any) <u>considered</u>. (note: There is no reference to a statuary 'consultation' requirement (as mentioned in this report) in the Environmental Planning and Assessment Act.)

'To consult' is defined as 'to seek the opinion or advice of another, to take counsel.'

This is a different meaning that 'to consider' which is defined as 'to think carefully about <something> typically before making a decision.'



- The community's responses are rarely positive (e.g. Council's notice to neighbours was, for a time, referred to as 'Objection letter' and unpopular planning decisions are often blamed by Council on residents for not objecting.)
- As a result, planning approvals by Council Officers or Planning Panels rarely have community support, so that as a marketing exercise 'consultation' is not particularly successful.
- Does 'community consultation' actually change the nature of an approval?
 While additional information may be sought, if the application is fully compliant, then it is likely to be approved unchanged, or with minimal changes that may or may not actually address the concerns raised, and may or may not improve the quality of the application.

Summary: While community consultation is seen as beneficial, it slows down the approval process and at best provides a compromise, not required under the planning legislation and at worst benefits neither party, nor Council's community standing.

Increased 'community consultation' began at approximately the same time as the introduction of Exempt and Complying Development.

In our view, this was a deliberate and popularist attempt by Councils to differentiate between the D.A. and complying approval pathways.

- c. 'Council is meeting its housing targets.'
 Comment:
 - What does this mean?
 - How is it measured?
 - Why is there a shortage of affordable housing if this is correct?
- **d.** 'The environmental constraints (steep slopes, flooding and bush fire risk) of the L.G.A. mean a code assessment is no appropriate.'

Comment:



- This statement seems to assume that 'Missing Middle' development will occur in these areas, generally on the fringe of the L.G.A.
- The intention of 'Missing Middle' development is to include small pockets of medium density development into existing suburban streetscapes, as part of a 'turnover' of property types. This is more likely to happen in older 'core' areas of the city and suburbs where there are older small dwellings on larger lots i.e. where the dwelling's value is less significant than the land value. This is less likely in newer areas where these noted constraints may apply.
- Complying development is permissible in both bushfire and flood affected areas, depending on the Council or R.F.B.'s assessment of risk and the provision of a consultant's report.
- Steep slopes are only problematic if geotechnical issues are involved.
- e. 'Is not consistent with the local or desired future character of many suburbs.'

Comment:

- a. Wollongong City Council have prepared:
- i. Character Statements (DCP, From North to South order)
- ii. Locality Based Plans for areas ranging from a precinct to a suburb, also including character statements.

Comment:

- These separate documents should be edited together.
- Chapter D1 should be relocated to the first chapter in the DCP (rather than the fourth) to reinforce its importance at an early stage.
- Reference to it should be made throughout the remainder of the document.
- 1. Aims and objectives

This statement is clear.

2. What is Character?



- Existing Character: This is a technical definition that provides little guidance to the reader. This concept is more fully explored in the third paragraph, however, to be accessible to all readers, fewer technical terms and a point format should be used. Each referenced characteristic needs to be better described, possibly with illustrations. This information is critical to an applicant understanding the importance of context.
 Reference to the SEPP 65 Apartment Design Guide and its forerunner, the Residential Flat Design Code should be made and adopted by Council in this section; see
- Apartment Design Guide Part 1: 'Identifying the Context', parts 1B Local Character and Context 1C Precincts and Individual Sites
- 2. Residential Flat Design Code; a), part 01 Local Context

In both documents analysis of local character is designed to inform the selection of primary planning controls for the specific site.

In reality, this analysis, (if any) is carried out by the designer, post design phase as a justification., and by the planning/assessment staff not at all.

The initial pre-lodgement meeting should address these issues almost exclusively.

b) Site Design:

The R.F.D.C. required that 'A written statement explaining how the design of the proposed development has responded to the site analysis must accompany the development application.'

Although this practice is more honoured in the breach than the observance, it is a better defined process that is set in the W.C.C.

D.C.P. and consideration should be given to its conclusion.

Drawing both applicant's and assessing officer's attention to this requirement will result in more appropriate precinct specific solutions, which will be a point of difference to the 'Missing Middle' code and provide a more positive response from neighbours for a more familiar proposal in the street.

7.3 Comments on the Paper's Executive Summary

This Housing and Affordable Housing Options Paper has been prepared to inform the development of a new Housing Strategy for Wollongong L.G.A. The purpose of this Paper is to present the key issues and planning priorities for housing,

as well as options and key recommendations moving forward. Key findings and recommendations from this Paper will be used to engage the community, to inform development of a new Housing Strategy for Wollongong L.G.A.

The Wollongong L.G.A has enough theoretical capacity under existing planning controls to deliver the amount of housing required to meet future housing projections over the next 20 years.

However, there are some key issues for housing to address that relate to:

Performance of Land Use Zones:

 There is little difference between the type of housing that is being developed in the low and medium density residential zones;

Comment: This is because both uses are permitted under the L.E.P.

• 78% of the housing in medium density zones is single dwelling housing and not the desired medium density form.

Overall, the established medium density zoned lands are far from capacity;

Comment:

- a. Existing: This proportion will gradually decrease.
- b. Insufficient motivation to build due to Council Code restrictions; i.e. not profitable.
- Over the past decade there has been a large amount of residential development in business zoned land especially in the Wollongong City Centre. This has diversified housing stock typically taking the form of a mixed use apartment building above a commercial ground level. However, this influx of housing has weakened the intent of business zones, as employment lands are being locked up and transitioned to apartment buildings under strata title.

Comment: Inappropriate Council zoning is now being reviewed.

Housing for Particular Needs:

- The housing needs of different sectors of the community are complex. Different approaches are required to provide choice for residents and to respond to the different levels of assistance required.
- The population of Wollongong L.G.A. is ageing. It has also experienced an increase in the proportion of residents requiring assistance in the daily needs.

 Housing affordability and affordable housing are a large and growing issue for many residents. Affordable housing is an issue for 53% of households throughout Wollongong L.G.A.

Comment:

- a. A better diversity of approval pathways will provide a better 'fit' with complex requirements.
- b. Council's opposition to the 'Missing Middle' code is counterproductive.

Household size vs Dwelling Size:

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A mismatch between household size and dwelling size is an emerging trend. There has been a shift towards smaller
household sizes (lone person and couples) and there is fewer one, two and three bedroom housing stock being
developed. There has been a large increase in four bedroom stock.

Comment:

- **a.** Financially independent 'baby boomers' and 'empty nesters' are choosing to retain the family home. This is a generational trend and will eventually reduce.
 - b. Alternative 'lifestyle' accommodation near beaches etc. is seen as too expensive.

Cost of Housing:

- The cost of housing has increased substantially in the Wollongong L.G.A. over the last decade with median house prices increasing by 84% and median unit prices by 65%. Most of this increase has occurred since 2001.
- There has been a strong decline in the proportion of households in Wollongong L.G.A. who can afford to rent or purchase housing.
- There is a large and growing gap between the number of low income households and private rental housing that is affordable for these households.

Comment: This is a national and local trend driven by the Sydney market. Unsolvable directly by Council.

Legislation and Land and Environmental constraints:

 Historical development of residential land did not extensively consider and respond to land and environmental constraints.

- - Standardisation of the Local Environmental Plans presented challenge for Wollongong, with the current R2 low density residential zone having resulted from a merge of various other zones.
 - Legislative reforms and introduction of Statement Environmental Planning Policies has reduced and/or removed Council's ability to assess the impacts of proposed development. This presents challenge for Wollongong into the future.
 - New housing built will need to appropriately respond to the various land and environmental constraints which exist. e g. Flood risk, bushfire risk, riparian corridors, Illawarra Escarpment.

Comment: Generally, these are issues common to all Councils. This 'standardisation' will continue.

Based on the findings of a needs analysis, and issues and options presented in this paper, three key planning priorities for housing are recommended:

- 1. Increase housing stock diversity;
- 2. Plan for future housing growth;
- 3. Increase the supply of affordable rental housing.

Moving forward it is important that the supply of housing delivers the type of housing residents need as our City grows and changes. A diversity of housing types, sizes and price points will assist in meeting this need. Increasing the supply of housing that is adaptable to resident's changing needs is becoming increasingly important in Wollongong L.G.A. as the population ages.

Key recommendations to address the planning priorities are summarised below:

- Increase the number of studio, 1 and 2 bedroom dwellings, to provide options that better match household sizes (e.g. Manor Houses).
- Review the role and operation or character statements and in response to introduction of state policies.
- Increase the supply of adaptable housing stock.
- Preparation of development controls in relation to new forms of housing that diversify housing stock e.g. Fonzie

flats.

- Define areas for urban growth around medium density residential zoned land. Develop an urban growth strategy
 for each area to facilitate an appropriate level of growth whilst achieving the desired local character. Such growth
 will require adequate infrastructure and response to land and environmental constraints.
- Undertake employment and retail lands study to inform development of urban growth areas and business zoned land.
- Support implementation of City Centre Planning and Design Review, West Dapto Vision and West Dapto Contributions Plan.
- Continue to develop and implement an Affordable Housing Contribution Scheme for Wollongong L.G.A. under SEPP 70.
- Adopt and implement an affordable rental housing target for Wollongong L.G.A.
- Work with Community Housing Providers and the NSW Land and Housing Corporation to renew and improve and increase social and affordable rental housing supply in Wollongong L.G.A.
- Develop and contribute to partnerships that deliver affordable rental housing.
- Monitor projected dwelling needs, housing supply, affordable housing and capacity of the Wollongong .LG.A. to deliver housing.
- Engage the community in relation to a draft Vision for Housing.
- Review permissibility of residential housing types across R2 Low Density, R3 Medium Density, R1 General Residential, and business zoned land.

It is recommended this paper is exhibited to obtain community feedback regarding housing preferences, issues and options. Council will use community feedback to inform the development of a final Housing Strategy for Wollongong L.G.A.



A housing strategy for Wollongong is being developed to meet the requirements of the NSW Government Local Housing Strategy Guideline. This paper is also being used to inform the preparation of Wollongong L.G.A.'s Local Strategic Planning Statement.

Comment:

a. Recommendations should lead to:

- i. Council code reviews to incentivise more targeted outcomes provided by the private sector and housing trusts.
- ii. Council review of assessment procedures to simplify applications and speed up approvals.
 - b. Community engagement. This document needs to be substantially rewritten for submission to the community.

7.4 Comments on Other Sections of the Paper³ Section 1: Context

Studies commenced in 2005, yet there has been no change to Council's response as these issues have worsened.

1.5 Council Planning Policies

a. Town and Village Planning

Comment: Due to its linear nature, Wollongong developed as a series of semi-independent villages along a transport corridor. Remnants of this can still be interpreted.

These studies need to be given greater weight, both in the community and in the relevant codes.

Section 2: Capacity Analysis

Comment: Achieving set goals requires changes to codes to incentivise providers.

The mismatch between goals and outcomes needs better management, either by Council, or State Government Planning initiatives.

Section 3: Housing for Particular Needs

3.2 Social Housing

Comment: In my professional experience, applications are often met with resistance from Councils and strong protests from neighbours, concerned about drugs, crimes, devaluing of their property.

Instead of broad acre social housing e.g. Unanderra, Bellambi, newer projects are smaller and scattered throughout existing suburbs.

3.3 Housing for Students

Comment: Near the University of Wollongong campus, this is a strong competitor with social housing.

3.4 Housing for Seniors

Comment: At the 'low care/independent' end of the spectrum, this requirement competes with/is part of affordable housing.

Higher needs groups are either cared for by relatives or in aged care institutions. 'Council's scope is limited.'

3.5 Housing for People with disability

Comment: As for Housing for Seniors.

3.6 Affordable Housing

Comment: Council's ability to address this problem directly is limited, however reviewing codes may make this sector more financially attractive to providers. Further delays will exacerbate the problem.

The statistical analysis provided is interesting in a philosophical sense, but in a practical sense, serves only to underline the continuing urgency of the problem.

3.6.8 Council's history with affordable housing

Comment: Although there has been a long term commitment, little has actually been achieved by Council initiatives.

Section 4: Housing Issues

4.2.8 Heritage

Comment: There is a widely held community belief that any heritage listed property is subject to very strict planning controls that affect all aspects of the property, including for example repainting and kitchen/bathroom upgrades.

This belief often results in demolition by neglect or illegal demolition.

Other councils, see appendices, provide useful advice either in the DCP or elsewhere in dealing with heritage listed properties and additions.

Guidelines for adaptive re-use can also be sourced and included.

Owners should be given numerical/qualitative 'bonuses' in planning guidelines to encourage retention of properties.

This principle should also be extended to unlisted buildings within streetscapes with strong and consistent heritage values but which are not listed as Heritage Conservations Areas.

Applicants could make a case for this in applications where proposals blend into the streetscapes.

Section 5: Vision for Housing and Options for Growth

Draft Vision Comments

Item 4 - Attachment 2 - Feedback on Draft Strategies Presented in Option Paper

Comments:

- **a.** Presently, housing of all forms does not respond to either the natural or heritage setting. These requirements need to be made much clearer.
- b. Similarly, for distinctive local character.

5.1 Options

5.1.1 Medium Density Zoned Land

Comments:

Option 1 – No change

Simply re-zoning land will not produce the desired results in a timely manner.

Option 2 – Adjust Controls

- This will make medium density development more attractive to providers.
- b. Reduction in on-site carparking and landscaping should also be considered.

5.1.2 Dwelling Mix



Option 1 - No change: Not recommended

Option 2 – Diversify housing stock: See comments above; supported in some circumstances.

5.1.3 Low Rise Medium Density Housing Code

Comments:

- a. Developments will be relatively small in nature, dual occupancies and manor houses (three to four units); terrace houses are not expected to have more uptake, due to the shape of the lot required (wide and shallow).
- b. On small lots, deep soil planting is not expected to provide the cover envisaged in 'Urban Greening'.

 There are code requirements for medium size trees.
- c. For affordable housing, carparking needs are likely to be less.
- d. The Code requires a character statement to be prepared. Council has not excelled in this concern to date, by comparison.
- e. Take up is presently low; there will be an acclimatisation period required.
- f. Generally quantitative built outcomes such as FSR, height, set back are similar in both complying and DA models.
- g. Future take up will depend on the perceived ease of obtaining approvals compared with the current DA/CC process.
- h. Notification. Neighbours comment are required to be considered. This is not consultation; neighbours are not part of the final decision making process (see Appendix relating to 'Inner West' guidelines).
- i. Privacy and solar access requirements are given more consideration than under Council codes.

Exemption from Code

Comments:

a. Unlikely

- b. Possible only if Council could demonstrate equal or better performance.
- c. Manor houses are expected to offer significant cost savings;
 - i. Compact form
 - ii. Simple construction
 - iii. Smaller units

Additionally, comparison between the Code based controls and Wollongong LEP and DCP controls highlighted opportunities for Wollongong to strengthen the internal amenity of dual occupancy and multi dwelling housing, enhance the interface between housing and the street, and remove inconsistencies in DCP provisions. A review of Wollongong DCP provisions relating to dual occupancy development and multi dwelling housing is also recommended.⁴

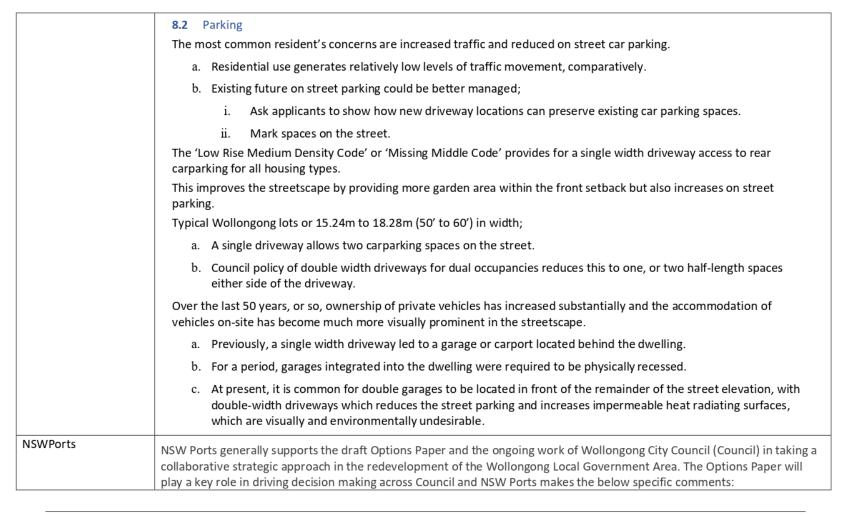
5.3 Options to improve housing affordability

Comments:

- a. Land cost component will remain the same under all options.
- b. Provision of more, smaller units should be encouraged.
- c. For affordable housing, carparking needs are likely to be less.
- d. Adoption of policies, targets, analysis and advocacy to date, define, but do not solve, the problem.
- 8.0 RESIDENTS' CONCERNS AND ON STREET PARKING
- 8.1 Residents' Concerns

That they are heard.

- 1. Residents are pleased that Council took their advice when an application is refused (irrespective of the reason).
- 2. Residents assume Council is corrupt when their objections are 'ignored' and the application is approved.
- 3. Clearly, this interaction needs to be managed better.



Rezoning of Key Sites

When considering Planning Proposal requests which will contribute to future dwelling supply within the vicinity of Port Kembla and port related infrastructure, Council must also consider the impact future residential development will have on the operation and development of industrial land and port-related infrastructure.

It is critical that buffer zones around port-related infrastructure (roads, rail and pipelines) are maintained and large parcels of industrial lands near Port Kembla are retained.

NSW Ports advocates for the preservation of industrial lands around Port Kembla for port-related uses. New residential development should not occur at the loss of industrial land which supports Port Kembla. Council must carefully consider strategic planning decisions with the potential to hinder port development, given the significance of Port Kembla to the Illawarra region.

Port Kembla Town Centre

The Options Paper includes a request from the Neighbourhood Forum Alliance to consider low-medium density housing in areas 250m from business zones. The area immediately to the south-west of the Port Kembla town centre is included

in this request. The Options Paper considers the appropriateness of up zoning the area shown in Figure 1 from R2 – Low Density Residential to R3 – Medium Density Residential to encourage the development of town houses, multi dwelling housing and residential flat buildings.



Figure 1: Transition precincts (outlined in red) as nominated by the Neighbourhood Forum Alliance

Given the proximity of the port of Port Kembla to the proposed transition area, NSW Ports encourages Council to investigate future land use conflict of this area thoroughly. In order for the Port of Port Kembla to operate efficiently and meet the trade needs of the State in the future, it must be unencumbered by urban encroachment. The further urban intensification of this land within close proximity of the port would be considered inappropriate. Experiences in other port areas in the State has demonstrated that mitigation of development that is located in inappropriate areas is not the solution to the potential land use conflict. Development controls for sites with direct lines-of-sight to the Port or that have the potential to be impacted by future operations should not be changed to allow for a potential increase to residents exposed to Port impacts.

Dombarton (Future Rail Corridors)

The Options Paper identifies the Dombarton – Wongawilli – Huntley area as requiring 2,052 single dwelling houses and 451 terrace, townhouse, villas 1-2 storey flats and apartments by 2036. Consideration should be given when planning for housing around the Dombarton area to the proposed future Maldon-Dombarton Rail Line. Any development in this area should not impact the alignment or future operation of this freight corridor. Further, the impacts of this corridor on future

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	dwellings should also be considered when planning for dwellings located within the vicinity of the Maldon-Dombarton Rail Line.
	Land Use Compatibility (Existing Rail Corridors)
	The Options Paper references the opportunity to intensify land around train stations for residential development. From a planning perspective, we appreciate the value and importance of increasing density and the height of buildings adjacent to the Illawarra Rail Line and the Moss Vale to Unanderra Line. However, NSW Ports is concerned that increasing the density of development, in addition to exposing residential and sensitive uses to noise impacts from freight trains could hinder the current and future operation of the freight rail lines.
	Freight movements along freight corridors commonly occur at night time due to the scheduling of available rail paths on the Illawarra Line and Moss Vale to Unanderra Line. Night time freight movements can increase the acoustic disturbance to residential and sensitive uses if they are not appropriately planned or mitigated through the design and construction phase. On this basis, it will be important for Council to consider the intensification of residential development along rail corridors and ensure the design mitigation measures consider the future noise environment.
	Given the intent of the Options Paper is to inform changes to the planning controls, the above should be considered as part of the next phase of strategic planning work for Wollongong City Council.
Resident	Council should partner with an initiative like Nightingale that not only provides housing for sale (and soon to be for rent) atcost, but also does it in an environmentally sustainable way with a focus on community connections. More info here: https://nightingalehousing.org/
NF5 – Submission 1	At its email meeting on 1st April the Forum agreed that Council be requested that as a matter of extreme urgency they:
	i reinforce civic leadership in economic development and increase resources to identify and actively court enterprises which have the potential to move to Wollongong, especially to the City Centre;
	ii protect our suburbs and contribute to the sustainability in our city by amending the DCP, whether or not further amendments are imminent, at:
	 section 3 of Chapter D1 to revise the Desired Future Character Statements for at the very least the 7 suburbs in the Neighbourhood 5 area, to replace the first or second paragraph as appropriate with:
	" (the suburb) will remain a leafy suburb with a mix of housing types ranging from detached dwelling- houses, boarding-houses, villas, townhouses and some residential flat buildings. In this regard new

	residential development (including boarding houses) in the Low Density Residential R2 Zone beyond 400 metres walking distance of a Commercial Zone or a major employer (eg the University or Hospital), and in the area east of Robsons Road in the case of Keiraville, must have the appearance from the street of a typical house on its own lot in that street";
	section 4.1.2.4 of Chapter D4 to replace it with "in R2 Low Density Residential zones, development not directly facing the street is limited to single storey, so as to not adversely impact on the amenity of the adjoining property."
	(a) clause 3 in Chapter E16: by adding a sub-clause:
	"No new dwellings will be approved in a designated Fire Prone Area if that area is adjacent to the Illawarra Escarpment".
NF5 – Submission 2	Rezone the 6 – 8 Grand View Parade Lake Heights to RE 1 Public Recreation and petition the State Government to transfer the land to Council.
	We are aware of Council's reluctance to take on maintenance responsibility for small parks but understand that the local community is exploring whether it could form a bushcare or other group to do the maintenance on behalf of Council.
NF5 - Submission 3	On Wednesday 5th June the Forum resolved to advise Council that in relation to the Housing Option proposals it considered:
	1 Housing Diversity,
	as the medium density zones are clearly not delivering:
	i support option to prohibit dwelling houses;
	ii not support, increasing height and floor space ratio;
	iii support review lot widths, provided they are combined with reduced floor space ratios;
	iv not support expanding the zones;
	v not support increasing floor space ratio for more smaller dwellings;
	vi strongly support seeking exemption from the Low Rise Medium Density Housing Code;
	vii support one bedroom units above the garage of the main dwelling if it has rear lane access.
	2 Housing the Aged and People with a Disability:
	support advocacy proposed.
	3 Housing Affordability:

	i support review development controls to increase supply of Liveable Housing (ie dwellings with the capacity to be adapted to cater to the needs of different occupants over time);
	ii not support increase density allowance for Affordable Housing proposals;
	iii support working with NSW Land and Housing Corporation to redevelop their holdings;
	iv strongly support advocating changes to fiscal and taxation policies to improve housing affordability.
	4 Clarifying Zoning Intent - R1 General Residential:
	support conversion to a R4 high density residential zone provided that there is no increase in height or density
	provisions, that it is compatible to adjacent development and that it has local open space existing or proposed nearb
	5 Clarifying Zoning Intent - Hospital Precinct;
	support a review boundaries vis-a-vis residential zone;
	6 Clarifying Zoning Intent - Low Density Residential;
	support a major review if it is predicated on reducing medium density floor space ratios in remote locations and on reflecting the character of local street and neighbourhoods;
	7 Clarifying Zoning Intent - Business Zoned Land:
	support a review to limit residential developments in or very near the city centre core;
	6.2.8 Neighbourhood Forums' Alliance Proposals:
	supported other than the suggestion that the transition areas are rezoned medium density.
Bulli BC	Seek rezoning of former Bulli Bowling Club site to R3 medium Density
Ethos Urban for Church	Request rezoning of 25 O'Briens Road, Figtree from RU2 Rural Landscapes to R3 Medium Density. 2.98ha

