

Our Reference: HOG11/52226

Michael Woodland  
Director  
Department of Planning and Infrastructure  
GPO Box 3927  
SYDNEY NSW 2001

18 November 2011

Attention: Robert Byrne  
Senior Planner

Dear Mr Woodland

**Re: Tallawarra Lands Concept Plan**

I refer to the Department of Planning and Infrastructure's (DPI) public exhibition of the Concept Plan for Tallawarra Lands (the subject site) in the Wollongong Local Government Area (LGA). Housing NSW welcomes the opportunity to review the documents and appreciates the extension on the submission deadline.

Housing NSW's interest in the Concept Plan is twofold – to promote housing affordability more generally across the LGA, and to ensure access to housing is provided for all income groups and for all stages a household may go through.

There is a concentration of Housing NSW properties in close proximity to the subject site. It is considered that the Concept Plan would have minimal impact on any Housing NSW properties in this location. However, as cited above, Housing NSW is interested in the impact on the housing market and promoting general affordability across the LGA. In this regard Housing NSW has undertaken a housing market analysis for Wollongong LGA (**Appendix 1**). It is hoped that this information will be useful in informing DPI on the current housing situation in the LGA and the Upper South Coast subregion, and when formulating principles to address residential development for the subject site. This Analysis examines the affordability, adequacy and appropriateness of housing to meet the needs of the local community, with a particular focus on low and moderate income earners who may be in housing need. Key housing issues are identified including (in summary):

- It is important to ensure that there is sufficient diversity in housing tenure, dwelling type, housing configuration and housing affordability, to meet the needs of the current and likely future population;
- The need for more diversity of housing stock, including more one bedroom and two bedroom stock, studio dwellings, accessory dwellings or granny flats and boarding house type accommodation, to meet the needs of the community throughout the housing life cycle;
- The fact that a significant proportion of CRA recipients in housing stress in Wollongong are aged under 25 years suggests there are insufficient affordable housing opportunities for young lower income earners, including university students;

- There is also a need to provide more purpose built aged housing to cater for the older lower income residents, including accessory dwellings or granny flats, particularly targeted to lower income earners. Ensuring that there is sufficient adaptable housing to allow older residents to age in place is also important;
- The fact that there are significant numbers of people (usually pensioners) living permanently in caravans in Wollongong further demonstrates that there is insufficient affordable housing to meet demand;
- The lack of affordable housing for purchase for low and moderate income earners. Purchase affordability is tight across the whole of Sydney and there is a rapidly growing proportion of low and moderate income purchasers in housing stress in Wollongong. It is now extremely difficult for lower income earners to find affordable purchase opportunities in Wollongong; and
- The BankWest Key Worker Housing Affordability Report from March 2009 indicates that Wollongong is not affordable for purchase by any of the five key worker groups investigated – nurses, teachers, police officers, fire fighters and ambulance officers.

In light of the above housing issues and the fact that a significant number of residential lots have been proposed, the subject site needs to provide for a diverse community. It is therefore recommended that a Social Impact Assessment (SIA) be prepared. The SIA will help identify potential social impacts of the proposed development, and ensure that the capacity of existing and the potential need for additional infrastructure, services and amenities (such as healthcare, aged services and schools) to cater to the needs of the future residents of Tallawarra Lands is assessed. HNSW also asks whether social impact assessment could be included as a standard Director General's requirement in major development applications for similar projects.

Housing NSW notes that only housing yield and density have been proposed in the current Concept Plan. The adjacent Dapto Release Area has a significantly higher maximum density of 25 dwellings/hectare in comparison to the subject Concept Plan Application which proposes a maximum density of 15 dwellings/hectare. Simply identifying the density to be constructed will not guarantee diversity in housing type (e.g. a mix of traditional detached dwellings, zero lot housing, small lot housing, attached dwellings etc) or configuration (e.g. a mix of one, two, three bedroom and larger housing stock). As such, it is suggested that a range of dwelling types be identified. A mixture of dwelling types would prove opportunities for all demographic groups and a range of household types to access housing.

Given the size of the site and the number of dwellings proposed, it is also suggested that a design guideline be prepared prior to the determination of the Concept Plan to guide the development of each subsequent stage of this Major Project. The design guideline would be beneficial in encouraging a range of housing types with a variety of housing configurations, as well as consideration of alternative dwelling choices such as accessory dwellings to ensure diversity of housing choice.

Housing NSW notes that the Concept Plan proposes to develop 200 residential lots for seniors living as part of a retirement village in the Lakeshore Precinct. It is noted that the justification for locating the village in this Precinct is due to its flat topography. Although this is acknowledged, it is considered that the retirement village would be better located in a more accessible location such as the Central Precinct due to its proximity to the retail shops and services in the proposed neighbourhood centre. Further, seniors living should not be simply

restricted to the retirement village, but scattered across the subject site. It is suggested that a proportion of adaptable housing be negotiated to allow residents to age in place.

Housing NSW also notes that the provision of local bus routes will take place in a time frame beyond the Concept Plan determination. Given the current inaccessibility of the subject site, it is not an ideal place of residence for seniors or low income families. It is therefore suggested that adequate bus routes running within Tallawarra Lands and connecting the subject site to surrounding areas be considered at this early stage. The location of the bus routes will impact the widths of the street network, which in turn will impact the overall design of the subject site. If the new site design results in a lower allotment yield, this would lead to a decreased supply of housing and therefore affect the overall housing affordability of the Upper South Coast area.

It is also noted that no specific uses have been determined for the 2.5 hectares of headland area in the subject site which is designated for tourist uses. It is suggested the use of this land be determined at the Concept Plan stage, as the provision of tourist accommodation will influence the availability of permanent accommodation for local residents. The Concept Plan needs to ensure that any development for tourist uses will not impede on the available quantity of permanent accommodation or place additional pressure on nearby caravan park accommodation.

Housing NSW would also like to offer the assistance of the Centre for Affordable Housing. It is suggested that the proponent contact the centre to collectively figure out how to achieve greater housing diversity and affordability. The Centre is a business unit within Housing NSW whose purpose is to facilitate increased affordable housing opportunities across NSW. The unit can provide expert advice and assistance in developing affordable housing responses and brokering partnerships between private developers, Government and the non-profit sector. Renee Wirth, the Centre's Principal Policy Officer can be contacted on ph 8753 8182.

Housing NSW welcomes further involvement with DPI regarding the determination of the Concept Plan, as well as any subsequent Project Applications. Should you have further queries please do not hesitate to contact Mark Byrne, Acting Director Resource Planning on 6363 6001, or Sue Brown, Principal Planner, Portfolio Strategy and Urban Planning on 8753 8529.

Yours Sincerely



**Brodie Druett**  
General Manager  
Southern and Western NSW  
Housing Services Division