

#### **CM13.4. Draft Albury Local Housing Strategy - Public Exhibition Submissions**

**DATE** 16 March 2023 **FIL REFERENCE** FIL21/00833

**CONFIDENTIAL** No

**FURTHER ENQUIRIES TO** David Christy **PHONE** 6023 8111

City Development

**AUTHOR** Sonia Dalitz

---

#### **Purpose of Report**

To present Council with submissions received during the public exhibition of the draft Albury Local Housing Strategy and seek endorsement of the revised Albury Local Housing Strategy.

#### **Background**

Our Local Strategic Planning Statement (endorsed 14 September 2020) established that “Diverse, well designed and affordable housing is a planning priority for Albury” and set an action to prepare a comprehensive Local Housing Strategy to guide future housing directions across the Local Government Area (LGA).

The draft Albury Local Housing Strategy was prepared throughout 2022 in two project phases:

#### *Part One - Housing Evidence Paper and summary Housing Discussion Paper*

These documents contained detailed research and analysis of current housing supply, demographic trends, and gaps analysis. The comprehensive Housing Evidence Paper provided a single source of truth for helping understand the quantitative substantiation of changes that are occurring across the Albury housing market, as well as providing clarity on what areas local government can and cannot influence around the supply and adequacy of housing. A summary version in the form of a Housing Discussion Paper was produced to distil findings from this Housing Evidence Paper in a more accessible, plain English format. Both these documents remain available from the project ‘Have Your Say’ webpage.

#### *Part Two - Community and Stakeholder Engagement*

A consultation period was held between February and April 2022, to receive stakeholder feedback on the Housing Discussion Paper. A summary of ‘What We’ve Heard’ during this engagement period was produced to distil findings from the participation of more than 300 stakeholders across six engagement activities throughout the consultation period (including 17 interviews, 215 survey responses, four feedback sessions and a Housing Industry Forum with 55 attendees).

The draft Albury Local Housing Strategy was presented to Council on 11 October 2022, where Council resolved to:

- a. receive and endorse the draft Albury Local Housing Strategy;
- b. place the draft Albury Local Housing Strategy on public exhibition for a minimum of 42 days; and
- c. if no objections are received, that the draft Albury Local Housing Strategy be presented to Council for adoption.

### **Strategic Alignment**

#### *Riverina Murray Regional Plan 2041*

- Strategy 5.2 – Councils should consider local affordable housing needs, either separately or as part of a local housing strategy, to identify potential community, Council and State Government solutions and actions that could support low-income renters and purchasers.

#### *Towards Albury 2050*

- 1.1.1 – Responsibly provide residential and commercial development options for our growing city, whilst prioritising sustainability.

#### *Other related strategies*

- Local Strategic Planning Statement (2020); and
- Prevention of Homelessness Strategy (2019).

### **Issues**

Following endorsement of the draft Albury Local Housing Strategy at the 11 October 2022 Council meeting, the Strategy was placed on public exhibition from 19 November 2022 to 13 February 2023. Copies of the draft Albury Local Housing Strategy were made available on the AlburyCity website, at the Albury LibraryMuseum, the Lavington Library and Council's Administration Building.

At the conclusion of the public exhibition period, a total of 11 submissions were received. The below table provides a high-level summary of the feedback received, along with a summary of the officer's response. Full submissions and responses can be viewed in attachments 1 and 2.

Submission 1 – Peter Dixon
Request for Strategy to further consider non-traditional housing models.
<u>Officer's response:</u> Minor amendment to Strategy recommended. Wording of Action 12.1 to be updated to improve clarity around promoting emerging and non-traditional housing.

**Submission 2 – Dr Amanda Cohn**

Request for Strategy to change priority level of Action 7.1 [further investigations into development of an Affordable Housing Contribution Scheme] from low to high.

Officer's response:

No change to strategy recommended.

The expected timeframe for completion of this action is in the short term (within three years) with 'low priority' being strictly in reference to the anticipated allocation of Council resources. The next review of Albury's Development Contributions Plan is scheduled to commence in the next financial year (2023/24) and the scope will include further exploration and/or economic feasibility testing of a modest affordable housing contributions scheme.

**Submission 3 – Paula Watson**

Request for Strategy to commit to a higher level of Council intervention in the housing market to directly create more affordable housing product.

Officer's response:

No change to strategy recommended.

Advocating to other levels of government, leading community engagement and brokering partnerships is the most effective way Council can represent, promote, and advance affordable housing provision.

**Submission 4 – Anne James**

Request for Strategy to further consider more efficient use of older warehouses, shops, motels, or past industrial buildings for conversion to affordable housing.

Officer's response:

No change to strategy recommended.

Strategy addresses reuse and refurbishment of underutilised spaces at page 35.

**Submission 5 – Ray McFarlane**

1. Request for clarification of data quoted in the Strategy regarding unoccupied dwellings.
2. Suggestion that incentives can be offered for owners of unoccupied dwellings to provide them as affordable housing.

Officer's response:

No change to strategy recommended.

The data quoted in the draft Local Housing Strategy is correct.

Data indicates there are not a significant proportion of unoccupied private dwellings in the Albury LGA.

**Submission 6 – Jason Gardner**

1. Request for change in approach to residential infill development.
2. Support for NSW Government to deliver social housing in the Thurgoona Wirlinga growth area.
3. Requests for changes in approach to development of the Thurgoona Wirlinga growth area.

Officer's response:

No change to strategy recommended.

Infill development is considered an appropriate strategy to encourage more housing in areas which already have good access to services and facilities.

The submitters suggestions are captured within the scope of Action 9.1 [Review of the Thurgoona Wirlinga Structure Plan].

**Submission 7 – Jonathon Howard on behalf of Thurgoona Community Action Group (TCAG)**

1. Request for revision of the Local Housing Strategy policy alignment chapter, vision, and objectives to better align with Albury Towards 2050 statements on liveable communities.
2. Request for review of the Local Housing Strategy to better consider the priorities of the community.

Officer's response:

Minor amendment to Strategy recommended.

Terminology in housing vision on page 20 to be updated from "well-designed" to "well-designed built environments".

The 'What We've Heard Report' will be included as an appendix to the final Local Housing Strategy so that the full details of community views and preferences can be referenced by readers of the document.

**Submission 8 – Lee Street on behalf of Canopy Living Pty Ltd**

Agreement with several strategies and direction of the draft Local Housing Strategy.

Request that Council provide a 'fast track' assessment process for affordable housing development applications.

Officer's response:

No change to strategy recommended.

Strategy three (page 31) acknowledges there is more generally a need to actively assist all applicants to navigate administrative processes in the development assessment system.

**Submission 9 – David Hunter on behalf of Habitat Planning**

1. General agreement with the analysis and research base underpinning the Strategy and supports the proposed objectives, strategies, and key actions.
2. Suggestion that greater emphasis be placed throughout the Strategy on achievement of higher residential densities, including on key Council owned sites.
3. Request that Council sponsor a design excellence award.
4. Requests Council consider urban design reviews of all multi-level developments.
5. Requests for changes in approach to development of the Thurgoona Wirringa growth area.
6. Request for consideration of different house sizes as part of the future Infrastructure Contributions Plan review.
7. Concern that requirements for social impact assessments may inadvertently add cost to new development.

Officer's response:

1. Support noted.
2. Considered to be suitably emphasised through the draft Local Housing Strategy.
3. A local design excellence award was considered during the development of the draft Local Housing Strategy, however the resources required to implement such a process were considered to outweigh the benefits and also acknowledging other awards programs that may hold greater merit (eg. Planning Institute of Australia, Master Builders Association, Urban Development Institute of Australia).
4. Recommended additional action added to explore potential establishment of a local Design Review Panel (or similar Design Advisory Panels, Design Excellence Panel) to provide constructive feedback on the design quality of large/significant development proposals.
5. Suggestions are captured within the scope of Action 9.1 [Review of the Thurgoona Wirringa Structure Plan].
6. Minor change to Strategy recommended. Scope of Action 2.4 [Review and Update of the Albury Infrastructure Contributions Plan] to be expanded to include the submitter's suggestion.
7. Strategy 10 outlines that Social Impact Assessments are only required for larger or more significant rezonings or developments which are likely to have significant social impacts.

**Submission 10 - Ambrose Marquart on behalf of the NSW Land and Housing Corporation**

Requests for amendments to some phrasing and data throughout the Strategy relating to social housing.

Officer's response:

Minor changes to Strategy recommended.

Data quoted throughout Strategy relating to social housing waitlist to be updated, along with some phrasing of text at pages 7, 15, 49, 50 and 62 to improve accuracy.

**Submission 11 – Rebecca Willott on behalf of School Infrastructure NSW**

Request for clarification on population projections and for Council to continue consultation regarding growth precincts.

Officer's response:

No change to Strategy recommended. Council will continue to consult and advocate for further school facilities in Thurgoona.

As a result of the feedback received through the public exhibition period, several amendments have been made (outlined in detail at attachment 1) and are included in the final version of the Albury Local Housing Strategy (attachment 3). Overall, the amendments are generally minor adjustments, updates, additions, or clarifications.

Early Achievements of the Strategy

There have been several initial accomplishments arising from activities directly linked to the draft Local Housing Strategy:

- *Strategy Nine: Grow our supply of social housing:*  
Scoping of an East Albury Precinct Plan is progressing as part of the AlburyCity Collaboration Agreement with the NSW Land and Housing Corporation.
- *Strategy Two: Ensure all new housing development is properly supported by infrastructure:*  
Council was awarded \$247,500 from the NSW Government Regional Housing Strategic Planning Fund in December 2023 for strategic planning projects relating to accelerating housing in the Thurgoona Wirringa Growth Area.
- *Strategy Seven: Present a clear policy position on affordable housing:*  
In February 2023, Council staff participated in consultation run by the Department of Regional NSW to develop the Albury-Wodonga Regional Housing Delivery Plan.
- *Strategy Twelve: Encourage design and delivery of sustainable homes:*  
From 8 March 2023 to 2 April 2023, a touring Australian Museum 'Future Now' exhibition is being hosted by the Albury LibraryMuseum promoting 'clever homes'. This included a launch event on 16 March on 'Building Resilience' and a tour for students from Albury Public School.

**Financial Impact**

Although not fully quantified as part of the Strategy development, the anticipated cost of implementing the Actions within the Local Housing Strategy is estimated to be in the order of \$1 million over 10 years (equating to \$100,000 per year).

The larger cost items include:

- a Master Plan for South Albury;
- review and update of Council's Voluntary Planning Agreement Policy (2014), including allowance for legal advice;
- a business case for a modest Affordable Housing Contributions Scheme as part of review of Albury's Infrastructure Contributions Plan;
- transition of Council's annual development monitor from a paper based to online, interactive 'dashboard' format; and
- an audit of underutilised Council and other government land to assess their suitability for future affordable housing projects.

Implementation of the draft Albury Local Housing Strategy will also require ongoing collaboration with the NSW Government. If the draft Local Housing Strategy is endorsed, further scoping of key actions can be developed. It is anticipated that several of the key project elements can then be considered when submitting future grant applications and during future Council budget deliberations.

### **Risk**

- **Business Risk** – implementation of the Local Housing Strategy will require resourcing that can be considered through Council's planning and budgeting processes as well as potential external grant funding opportunities. Further scoping of key actions will be undertaken upon endorsement of the final version.
- **Corporate Risk** – the NSW Government encourages Councils to prepare local housing strategies to identify solutions and actions to support provision of affordable housing. There may be a reputational risk to Council if the Albury Local Housing Strategy is not adopted. The topic of housing consistently generates high levels of public interest and there are community expectations that Council will help ensure a variety of suitable housing is available for the community. There are ongoing pressures being experienced in the local housing market across the spectrum of housing types which, in the short to medium term, is highly likely to continue to affect the availability of housing that is affordable to people on low and very low incomes. There may be community expectations that actions associated with the Albury Local Housing Strategy will occur quickly, and these expectations will require careful ongoing management and ongoing collaboration and advocacy with other levels of government.
- **WHS and Public Risk** – Community and Stakeholder engagement methods complied with relevant COVID-19 restrictions.
- **Environmental Risk** – the Local Housing Strategy includes a key theme of 'resilience'. Under this theme, the project explores initiatives for how housing design can better respond to its environment and the changing climate and natural hazards.
- **Delivery Program Risk** – appropriate consideration has been given to ensure that measures proposed in the Local Housing Strategy Action Plan are realistic, achievable, and in line with

core business activities. The larger and more resource intensive actions have been staged in the Action Plan to assist in achieving the delivery program.

### Community Engagement

Community and stakeholder input has been a key component in developing the Albury Local Housing Strategy. The Stakeholder Engagement Plan, presented to Council on 13 September 2021, has guided the approach to consultation methods and activities.

A 'What We've Heard' report was prepared to provide a summary of the feedback and suggestions provided by our community during the engagement period and will be included in the final Local Housing Strategy as an appendix.

The following community engagement activities were completed as part of public exhibition of the draft Albury Local Housing Strategy:

- Public Exhibition from 19 November 2022 to 13 February 2023;
- Public Notice appearing in the Border Mail newspaper;
- Exhibition material placed on the AlburyCity Have Your Say project website;
- Three posts on Council's social media platforms;
- Email invitation to review the draft Strategy (and subsequent reminder email) sent to the 185 participants of previous consultation and community engagement activities;
- Promotion via News from AlburyCity and City Development's Summer (25 November 2022) newsletter;
- Promotion at the 8 February 2023 Access and Inclusion Committee meeting; and
- Project team members available for phone or in person meetings during the public exhibition period.

### Options

1. Endorse the final version of the Albury Local Housing Strategy (Attachment 3). This is the preferred option as the Albury Local Housing Strategy was developed in close consultation with housing industry stakeholders and has been through an extensive public consultation process. **Recommended;** or
2. Do not endorse the final version of the Albury Local Housing Strategy (Attachment 3). This is not the preferred option as ideas and comments received during public exhibition have been incorporated into the final version. **Not Recommended.**



## **Conclusion**

Following consideration of the eleven submissions received during the formal public exhibition period, endorsement is sought for the revised Albury Local Housing Strategy.

The Albury Local Housing Strategy provides a framework that will assist Council to guide and influence effective planning and policy solutions for the provision of diverse, well designed, and affordable housing in the Albury Local Government Area for the next 20 years.

If endorsed, actions identified as a high priority will be advanced into Council's delivery program and Advocacy Strategy. To ensure actions remain relevant, the Albury Local Housing Strategy will be reviewed every five years.

## **Recommendation**

That Council:

- a. receive and note the submissions received through the public exhibition period of the draft Albury Local Housing Strategy (Attachments 1 and 2); and
- b. endorse the final version of the Albury Local Housing Strategy (Attachment 3).

## **Attachments**

1. Submissions and response matrix (DOC23/140405).
2. Verbatim copy of larger submissions received (DOC23/141352).
3. Final Albury Local Housing Strategy (DOC23/147592).

No.	Submitter name	Submission	Officer Response
1	Peter Dixon	<p>Thanks for housing strategy study.</p> <p>1.1 Please note the NSW Gov initiative for rural landsharing and co-housing.</p> <p>The NSW co-housing initiative is reported in ABC news in below weblink and copied into the attachment.</p> <p><a href="https://www.abc.net.au/news/2022-10-31/rural-landsharing-and-cohousing-australian-property-market/101457812?utm_campaign=abc_news_web&amp;utm_content=mail&amp;utm_medium=content_shared&amp;utm_source=abc_news_web">https://www.abc.net.au/news/2022-10-31/rural-landsharing-and-cohousing-australian-property-market/101457812?utm_campaign=abc_news_web&amp;utm_content=mail&amp;utm_medium=content_shared&amp;utm_source=abc_news_web</a></p> <p>1.2 Please consider the previous Dixon leasehold proposal, and how it may meld with NSW housing initiative AND the Albury City housing strategy to provide continuing practical and economical housing.</p> <p><i><b>Note:</b> The leasehold proposal referenced is not published here as it was outlined in an email to Council officers provided as part of the previous community consultation phase of the draft Local Housing Strategy and not submitted formally as part of the Public Exhibition process.</i></p>	<p>1.1 The ABC article referenced discusses a housing cooperative model. Common Equity is currently the only known housing cooperative provider operating in the Albury LGA (page 48).</p> <p>As part of consultation for the draft Local Housing Strategy, an interview was conducted with the CEO of Common Equity on 13 December 2021. The CEO confirmed that there is a general lack of community awareness of cooperative housing models. The Housing Strategy 'What We've Heard Report' (page 13) also identified that there needs to be more promotion of alternative housing tenure options.</p> <p><b>Recommended change: Insert an additional dot point at Action 12.1 (page 63) [Advocacy and education initiatives] to read:</b></p> <ul style="list-style-type: none"> <li><b>Promoting emerging and non-traditional housing delivery and tenure models such as Cooperatives, Shared Equity and Rent To Buy.</b></li> </ul> <p>1.2 The leasehold proposal references a key worker housing scheme where homes are head leased or purchased by Government and leased to eligible tenants, with a portion of rent paid by tenants accumulating for their future use towards a home deposit. Due to the upfront capital costs involved with such a scheme, it is considered more appropriate that such a scheme be implemented at a State or Federal Government level.</p> <p>It is not considered applicable for Council to propose provision of a leasehold housing scheme at this time, in line with the Local Housing Strategy finding that local government should only step up to fill the provision gaps in affordable housing as a last resort (page 15).</p> <p><b>No change to Strategy recommended.</b></p>
2	Dr Amanda Cohn	<p>Thank you for the opportunity to provide feedback on the Draft Local Housing Strategy - an important strategic document for AlburyCity and for our community.</p> <p>2.1 I am delighted to see the inclusion of consideration of an Affordable Housing Contribution Scheme under the NSW Housing SEPP, however I disagree with the classification of this action as a low priority. This should be an absolute top priority to pursue in the context of a local and statewide housing crisis.</p> <p>According to the Albury City Housing Monitor, 4.6% of households (approximately 1,010) are in need of affordable housing in Albury, that is, they are unable to access market priced housing. In the last year, house prices in</p>	<p>2.1 The level of priority allocated to each Local Housing Strategy action refers specifically to the anticipated amount of Council resources that will be made available to progress an action (page 57). A low priority action indicates that the task should not be allocated dedicated Council resources but be addressed instead as resources become available or in the course of usual business. A 'low priority' was allocated to Action 7.3 to accurately reflect Council's conclusion that as long as the NSW <i>Environmental Planning and Assessment Act</i> (NSW EP&amp;A Act) ties affordable housing contributions schemes to rezoning proposals, limited resources should be expended to pursue further feasibility testing.</p>

No.	Submitter name	Submission	Officer Response
		<p>Albury have increased by an astonishing 30.7% - well above the regional NSW average of 18.9% and significantly higher than wage growth.</p> <p>Prioritising an affordable housing contribution scheme would ensure Albury remains a community of choice to live and raise a family - not just for property investors.</p> <p>I look forward to hearing the upcoming discussion on the Strategy and hope you will consider this important amendment.</p>	<p>Consultation for the draft Local Housing Strategy did identify high levels of community support for Council to consider implementing contributions schemes relating to affordable housing (refer page 13 of 'What We've Heard' report). The project team (including consultancy firm HillPDA) examined several available planning mechanisms for Council to find a realistic and achievable lever to collect contributions for affordable housing under the NSW <i>Environmental Planning and Assessment Act</i> (NSW EP&amp;A Act) (page 44). It was identified that affordable housing contributions schemes (also known as 'mandatory inclusionary zoning' schemes) would be problematic to implement in the Albury local context because they are explicitly linked to areas nominated for future rezoning and development. This is clearly stated in the NSW Government Guideline for Developing an Affordable Housing Contribution Scheme (2019) "Step 2: Identify areas for rezoning". Because Albury's land use settings already provide extensive zoning for residential housing density across the LGA, there is limited to no opportunities for Council to nominate specific areas for denser housing development that could 'trigger' the collection of developer contributions. Implementing an affordable housing contributions scheme in Albury could in fact have the unintended consequence of encouraging proposals for zoning 'uplift' in areas that are more unsuitable for higher density housing (e.g. outside of city centres).</p> <p>Action Item 7.3 (page 61) states that the next review of Albury's Development Contributions Plan is scheduled to commence in next financial year (2023/24) and the scope will include further exploration of a business case and/or economic feasibility testing of a modest affordable housing contributions scheme</p> <p>Action 7.4 (page 61) indicates that on an ongoing basis, Council will advocate for local housing issues at government and industry forums. This action has a High Priority. In line with previous Council submissions to NSW State Government, this will include lobbying for a planning system that better works to address the continuum of housing needs.</p> <p><b>No change to Strategy recommended.</b></p>
3	Paula Watson	<p>Thanks for this opportunity to view and comment on the policy.</p> <p>3.1 Given the crisis of homelessness and [lack] of rental availability - it seems the affordability issue is not addressed, except as a 'clear policy statement'. That does not mean the council intends to 'do' anything about it.</p> <p>Affordability means can you afford to buy a home, not just 'can you afford to rent one, let alone can you find one to rent. This is a complex and serious social problem, exacerbated by legislation that benefits the wealthy. Healthy economies are not built on inequity.</p>	<p>3.1 A tiered approach to Council's implementation of housing strategy actions is proposed (pages 14 to 15) and it is acknowledged that this does focus on Council's role advocating to other levels of government, leading community engagement and brokering partnerships. This is considered to be the best way Council can represent, promote and advance priority community interests including affordable housing provision.</p> <p>It is noted that Action 7.1 may not directly produce a tangible affordable housing product in the short term, however the publishing and promotion of an Affordable Housing policy position statement (page 43) will set out Council's expectations and send a signal to encourage the private market to deliver the particular affordable</p>

No.	Submitter name	Submission	Officer Response
			<p>housing products desired to achieve wider social benefits. Having a specific statement of principles that expresses a clear commitment to affordable housing delivery will provide a basis for consistent future decision making and resource allocation that may result in opportunity for delivery of tangible affordable housing product in the medium to longer term.</p> <p><b>No change to Strategy recommended.</b></p>
4	Anne James	<p>Hello Councillors, my thoughts re housing.</p> <p>4.1 I feel that too many buildings are not being used efficiently. E.g. older warehouses or shops, motels or past light industrial buildings could be converted into lower cost or social housing. In other words - use what we've got first, before building expensive new buildings.</p> <p>Waste not, want not.</p>	<p>4.1 The concept of encouraging re-use and refurbishment of underutilised space such as supporting the repurposing of older commercial buildings for housing, or revitalising shop top housing, is mentioned in the section on housing diversity (page 35).</p> <p>Promoting more infill development and adaptive re-use of existing buildings in Albury is also incorporated within the draft Local Housing Strategy definition of housing diversity and 'the missing middle' housing typology.</p> <p><b>No change to Strategy recommended.</b></p>
5	Ray McFarlane	<p>2021 census report regard private dwellings in Albury there are approximately 25,400.</p> <p>Of these there are 1,914 dwellings unoccupied 8% and 7,000 of these have single or lone occupants 31.6%</p> <p>5.1 Could there be incentives to house the homeless in some of these dwellings.</p> <p>5.2 Please fact check theses stats 2021 census Albury.</p> <p>I'm doing a diploma in community services 2023 Albury Tafe as I'm interested in housing/ helping the homeless</p>	<p>5.1 Unoccupied private dwellings as reported in the Census does not necessarily mean that a home is 'vacant' – it just means that the usual occupant wasn't home on Census night for reasons that might include being in hospital, travelling, waiting for a tenant to move in, home renovations, awaiting demolition or being a holiday home.</p> <p>The majority of local government areas that have a 'problem' with unoccupied private dwellings are typically coastal holiday hotspots with lots of holiday homes – for example, Shoalhaven LGA had 21.8% unoccupied private dwellings at the 2021 Census. In this space there is limited ability for Council's to influence the private rental market, but some local government areas with large numbers of holiday homes have written to non-resident ratepayers who own homes in their LGA to urge them to consider renting them out. As such the development of the draft Local Housing Strategy did not identify a significant proportion of unoccupied private dwellings in the Albury LGA to warrant this approach.</p> <p><b>No change to Strategy recommended.</b></p> <p>5.2 There were 25,434 dwellings counted in the Albury LGA at the 2021 Census of which 1,914 (or 7.6% of stock) were reported as being 'unoccupied'. This represents a significant decrease compared with the 2016 Census when 10.6% of dwellings were reportedly unoccupied. For both the 2016 and the 2021, the Albury LGA had between 2% to 3% less unoccupied private dwelling stock than the Regional NSW average.</p> <p><b>No change to Strategy recommended.</b></p>

No.	Submitter name	Submission	Officer Response
6	Jason Gardner	<p>I've read over the Housing Strategy, and the points I'd like to make have probably already been made by others with more technical knowledge of the subject that I have.</p> <p>I note that the Thurgoona/Wirlinga (TW) strategy is a different beast and is slated for consideration at a later date. Since that's where I live, I'll reserve more detailed commentary for that process.</p> <p>6.1 I would like to submit, if I may though, that this process ought not to be divided up piecemeal by suburb. I say that because I note the concept of infilling existing land with higher density structures to suit the ageing/non-nuclear family demographic. While those demographic trends are a concern, I'd suggest that a smarter way of dealing with these problems is not to increase the density of the population in areas such as Lavington or Springdale Heights, which already have considerable issues with public housing, among others.</p> <p>For example, if providing social housing is a State government role, and zone planning is an LGA issue, I can see one possible and quite simple fix that might be worth looking into.</p> <p>6.2 Simply, advocate with the Sydney government to fund and build social housing of size and scale suitable for single parent or small families with young children in the eastern end of the TW zone.</p> <p>At the same time, State government should approve, fund and build both a primary and secondary school in that area.</p> <p>6.3 Albury City's contribution would be changes to zoning to allow for a medium sized retail precinct in the area, along with approvals for a medical centre, fire/ambulance stations and public parks/playgrounds. Churches and other community groups might also be included in the zoning consideration, to add to the viability of the area as a standalone development.</p> <p>In tandem with that, the Feds should be approached to see if they can assist with the provision of residential aged facilities - or to provide support for private sector investment in such a facility.</p> <p>The balance to that, and what would make it financially attractive, is the rezoning of land lots to make "downsizers" see the area as an attractive location to build small dwellings.</p> <p>The result would be the provision of retail and community facilities to support an area already starved of them. A noticeable dent could be made in the waiting list for social housing. Well-heeled retirees could either independently downsize</p>	<p>6.1 The case for residential infill development is described (page 28) being that it can better utilise existing infrastructure by encouraging more houses in locations that already have good access to a range of existing services and facilities.</p> <p>There is a statement in the draft Local Housing Strategy (page 50) noting that it is important for Council to help challenge [negative associations of social housing tenants]. It is also noted that current approaches to social housing renewal and development focus on mixed tenure across precincts and suburbs rather than concentrations in one location.</p> <p><b>No change to Strategy recommended.</b></p> <p>6.2 Action 9.1 of the draft Local Housing Strategy (page 62) anticipates that Council's Collaboration Agreement with the NSW Land and Housing Corporation will provide an appropriate mechanism through which Council can advocate for the provision of new social housing deliver in suitable locations across the LGA including in Thurgoona.</p> <p>Council continues to advocate to State Government for additional public schoolings (primary and secondary) in the Thurgoona Wirlinga growth area.</p> <p><b>No change to Strategy recommended.</b></p> <p>6.3 The Thurgoona Wirlinga Precinct Structure Plan identifies future locations for retail centres, park and schools. The Structure Plan also encourages co-location of community facilities with these use and centres. Further consideration of the matters outlined form part of the scope of Action 1.2 (page 58) being Review of the Thurgoona Wirlinga Precinct Structure Plan.</p> <p>The draft Local Housing Strategy identifies that vacancies in seniors housing facilities in Albury are very low (page 22) and there is a need for provision of more aged care facilities. There is no specific action in the draft Local Housing Strategy to advocate to the federal government for provision of seniors living, however it is broadly captured within Action 7.4 (page 61) being advocacy for local housing issues at government and industry forums.</p> <p>In recent years, most Councils have divested their provision of residential aged care services to the private sector both because it is no longer seen as 'core</p>

No.	Submitter name	Submission	Officer Response
		<p>or take up residence in aged care facilities - this cohort would have the financial capacity to support a nascent retail precinct and make it attractive for local business to move away from existing locations to the TW area, and/or for entirely new business enterprises to start up.</p> <p>6.4 Increased development in the eastern area, making it more independent of the Albury CBD and Lavington retail nexus would also reduce the number of vehicle movements from TW to Albury/Lavington every day - thus making the connecting roads back to the Hume Highway less of an issue. In short, more TW development not only aids this area, but it also has flow-on effects that would benefit the wider community.</p> <p>I hope this is of interest to the Council.</p>	<p>business' of Local Government as well as because of changes to the federal government's funding model to favour a more competitive, consumer directed model.</p> <p><b>No change to Strategy recommended.</b></p> <p>6.4 Noted. The matters outlined form part of the scope of Action 1.2 (page 58) being Review of the Thurgoona Wirringa Precinct Structure Plan.</p> <p><b>No change to Strategy recommended.</b></p>
7	Jonathon Howard on behalf of Thurgoona Community Action Group (TCAG)	<p><b>Verbatim copy of submission in Attachment 2. Extracts of main issues copied below:</b></p> <p>7.1 It is TCAG's overall concern that there is a lack of congruency/alignment between this draft strategy and other higher-level documents such as the towards Albury 2050 strategic plan or the draft Two Cities One Community (2C1C) Strategic Plan where the Community have stated its preferences.</p> <p>Specifically:</p> <ul style="list-style-type: none"> <li>The number two priority in the 2C1C plan was liveability . Under the theme 'community' the number three priority was "We are a liveable community, connected to our region and other cities" whilst lower at number four was "We will advocate for increased housing diversity including affordable and sustainable developments"</li> <li>Similarly the number one priority in Albury 2050 is "Albury is a liveable city supporting sustainable population growth through the provision of high-quality infrastructure, industry-leading services and high levels of amenity" There is also mention about a "caring and healthy' and a "safe, inclusive and accessible" communities being a high priority.</li> </ul> <p>7.2 It is therefore unclear to TCAG how a draft vision for the housing strategy can be one that does not consider these major preferences: that there is a need for liveable communities with adequate open space, recreation facilities, and amenity.</p> <p>Instead the vision has a sole focus on nature of the houses: "Diverse, well-designed and affordable housing opportunities will continue in our planned Thurgoona Wirringa Growth Area supported by our Structure Plan, and also within existing urban areas through sensitive infill development, particularly around our activity centres which provide good access to service and facilities"</p>	<p>7.1 The status of the Local Housing Strategy and its policy alignment is shown in Figure 4 of the draft Local Housing Strategy (page 17) and further described in Table 3 (page 18 to 19).</p> <p>As outlined on page 11 "why do we need a housing strategy", the scope of the Local Housing Strategy was not intended to duplicate the objectives of other Council strategies such as Towards Albury 2050, but deliberately focused on:</p> <ol style="list-style-type: none"> <li>1. The greatest housing challenges we want to address</li> <li>2. The areas we can make the biggest difference</li> <li>3. Using Councils powers and policy levers to achieve housing objectives.</li> </ol> <p><b>No change to Strategy recommended.</b></p> <p>7.2 It is acknowledged that the Housing Vision as stated (page 20) does not use the term 'liveable'. This reflects a broader tendency for the draft Local Housing Strategy to focus on the term 'house' or housing' as an individual concept interchangeable with the term 'dwelling' or 'home', rather than the broader concept of housing as referring to whole communities in their urban setting.</p> <p>The housing vision's use of the term 'well designed' is consistent with terminology used in other urban planning practice guidance provided by the NSW Government Architects Office as meaning a "built environment that responds to the needs and aspirations of local people, now and in the future".</p>

No.	Submitter name	Submission	Officer Response
		<p>This draft vision needs to be changed so it explicitly considers the outcome as a result of housing rather than simply the houses themselves.</p> <p>7.3 Critical to any housing is the 'setting' these developments create and that it is people, and the subsequent communities that develop, who have aspirations about their life, wellbeing, and families that are a central issue. Similarly the proposed four pillars of: affordability, diversity, supply, and resilience, while being consistent with the NSW Government's Housing 2041 strategy, do not consider what the local community have stated as a priority for the Albury LGA.</p> <p>7.4 If Council believes there is a need for strategic alignment of a local housing strategy with a state housing strategy, by all means have the four pillars, but include an additional pillar that provides a local context to what the residents have told Council about its preferences: such as those outlined in Albury 2050 and the 2C1C Strategic Plan.</p> <p>TCAG's strong hope is that there will be a redrafted strategy produced than conceptualises housing not as the outcome, but that 'housing' is simply an activity that helps us create liveable communities that provide a safe, healthy place for people with diverse backgrounds to live and co-exist. As such there will be much stronger alignment with the preferences and visions that the community have already provided Council in the Albury 2050 strategic plan and the draft Two Cities One Community (2C1C) Strategic Plan.</p> <p>Please review and change the draft so the final document is one that considers the priorities the community have stated not remain as one that has narrowly and selectively picked a few actions amongst the entire list.</p>	<p><b>Recommended change: To make it clearer that Council is committed to good urban design in its broadest sense, amend the Housing vision to read: AlburyCity is committed to diverse, well designed built environments and affordable housing opportunities in existing urban areas and our planned Thurgoona Wirlinga Growth Area"</b></p> <p>7.3 The outcome of housing as a whole is discussed throughout section six of the draft Local Housing Strategy – Resilience strategies, defined as investment in both physical infrastructure and community programs to support residents (page 52).</p> <p>The draft Local Housing Strategy has numerous actions relating to ensuring housing in Albury is supported by adequate infrastructure, including Action 2.1 Preparation of a city wide social infrastructure strategy and Action 2.2 Prepare a city wide open space strategy.</p> <p>In addition, the draft Local Housing Strategy explicitly acknowledges that "resilient housing is not just about action at the level of individual dwellings, but about how the cumulative effects of urbanisation affect whole developments, and their neighbouring developments" (page 53).</p> <p><b>No change to Strategy recommended.</b></p> <p>7.4 Council conducted an extensive program of community consultation to develop the draft Local Housing Strategy the results of which are available in the What we've heard report (July 2022). This document outlines in some detail what residents told Council about their housing preferences, which has been appropriately incorporated throughout the draft Local Housing Strategy.</p> <p><b>Recommended change: Include the 'What we've heard report' (July 2022) as Appendix A to the final Local Housing Strategy document so that the full details of community views and preferences can be referenced by readers of the strategy.</b></p>
8	Lee Street on behalf of Canopy Living Pty Ltd	<p><b>Verbatim copy of submission in Attachment 2. Extracts of main issues copied below:</b></p> <p>8.1 [Consultation Findings] Our Comments: We agree.</p>	<p>8.1 Noted.</p>

No.	Submitter name	Submission	Officer Response
		<p>8.2 [Strategy One] Comment: This strategy is critical to enabling providing quality SDA housing in areas that are best suited to people living with disability. Typically, developers have sought outer areas with less infrastructure to take advantage of cheaper land prices, however we believe that this does not provide the necessary social infrastructure people living with disability require to live accessible, happy, quality lives with easy access and transport options. We have identified Albury and Lavington as key locations for infill opportunities, and we wholly support Council in strategy 6, further enabling our mission and vision for our resident's quality of life.</p> <p>8.3 [Strategy Two] Comment: review and enhancement of footpaths in infill areas is a key desirable for developers who are sourcing infill land for Specialist Disability Accommodation. Footpaths for wheelchair users is critical and highly desirable to use.</p> <p>8.4 We welcome any further support specifically to SDA Developers from Council as we enable the housing expansion of the 'missing middle' market. Particularly in SDA as a sub-category. Speed of the development process and approvals is paramount. SDA is quintessentially a public housing program funded by the Federal Government through the NDIS scheme , and SDA developers will benefit from support from Councils to fast-track development applications outside of CDC frameworks for our applications and enable us to build more stock more quickly and support government initiatives such as YPIRAC (Young People in Residential Aged Care Centres) national targets and support community members living with disability to move into fit for purpose and appropriate homes more quickly.</p> <p>8.5 [Strategy Six] Comments: Agree with Strategy 6 Action Plan. This action plan is a broader concept that provides long term stock viability in addition to the growth of SDA stock in the region catering specifically for persons who fit the criteria within NDIS. As SDA is approximately 6% of the total NDIS participant pool, we commend the ACC for this broader initiative to support people living with disability in their region.</p> <p>8.6 [Resilience Strategies] Our Comments: All Canopy SDA homes are built to Platinum LHA standards. We welcome involvement in future forums and events to advise and educate upon sustainable building practices we utilise in our developments which incorporate these Resilience Strategies. Our healthy, green, and connected designs reduce utility costs associated with rental for resident's outgoings due to our passive house design, solar panels, triple glazed windows and timber supplied from sustainable timber forests. We agree with strategy 12 in the plan. This is essential and we commend your commitment to building a resilient housing community.</p>	<p>8.2 Noted.</p> <p><b>No change to Strategy recommended.</b></p> <p>8.3 Noted. Footpaths are not explicitly mentioned or part of the draft Local Housing Strategy and are subsumed within the broader definition of active transport and local infrastructure/public facilities. Further direction on footpaths (and other active transport) will be part of the upcoming Integrated Transport Strategy.</p> <p><b>No change to Strategy recommended.</b></p> <p>8.4 The draft Local Housing Strategy does not propose a development assessment 'fast track' for affordable housing development, however Strategy Three (page 31) acknowledges there is more generally a need to actively assist all applicants to navigate administrative processes in the development assessment system.</p> <p><b>No change to Strategy recommended.</b></p> <p>8.5 Noted.</p> <p>8.6 Noted.</p>



No.	Submitter name	Submission	Officer Response
9	David Hunter on behalf of Habitat Planning	<p><b>Verbatim copy of submission in Attachment 2. Extracts of main issues copied below:</b></p> <p>9.1 Greater emphasis could be placed on the concentration of development at higher densities to locations that are well serviced by amenities, public transport accessibility and open spaces, such as the Albury CBD, Lavington and South Albury. While the Strategy does promote this theme, we feel greater emphasis could be placed in highlighting the role and function of such areas in accommodating growth into the future. The commitment to undertaking comprehensive master planning and structure planning processes for future potential growth areas is strongly supported.</p> <p>9.2 The potential of underutilised Council and State own land as providing opportunities for redevelopment could be further emphasised throughout the Strategy. Sites such as the Council Depot or former Flour Mill Site present clear opportunities to accommodate future growth, including the delivery of affordable housing, and should be further promoted.</p> <p>9.3 With a greater proportion of development being allocated to inner urban areas, the promotion of high quality, sustainable and site responsive design should be encouraged further. Opportunities for council to support the sponsorship of a design excellence award or similar may be beneficial in promoting high quality outcomes. Similarly, the provision of urban design reviews of all multi-level developments could also be considered in enhancing the amenity and design of development.</p>	<p>9.1 Compacting city centres through residential densification is a well established urban planning principle. This intent is considered to be suitably included in current statements in the draft Local Housing Strategy such the following extracts:</p> <ul style="list-style-type: none"> <li>From page 28: <i>In the short to medium term, encouraging compatible infill development around activity centres at Albury City Centre and Lavington City Centre is most likely to provide more housing options with good access to public transport, parks, shopping centres, schools and other important social infrastructure.</i></li> <li>From page 29: <i>South Albury also provides excellent opportunities for housing growth as it has walkable access to facilities and services located in Albury's City Centre and offers a reasonable supply of potential infill development sites.</i></li> </ul> <p><b>No change to Strategy recommended.</b></p> <p>9.2 In Action 1.1 there is a reference to the updated Master Plans for Albury and Lavington City Centres to provide additional development guidance on key opportunity sites to achieve higher density housing objectives (page 58). These key opportunity sites include the Council depot site and former Flour Mill Site (Railway lands).</p> <p>It is considered premature to place further emphasis on these opportunity sites until the outcomes of Action 8.1 is complete, being an audit of underutilised Council owned and other government land using the performance criteria outlined in Table 10 (page 46) of the draft Local Housing Strategy. Action 8.1 is expected to be completed in the medium term, which means outcomes will be able to inform a review of the Local Housing Strategy (every 5 years).</p> <p><b>No change to Strategy recommended.</b></p> <p>9.3 The implementation of a local design excellence award was considered during the development of the draft Local Housing Strategy, however the resources required to implement such a process is likely to outweigh the benefits given the existence of other awards programs run such as by the Planning Institute of Australia, Master Builders Association, and Urban Development Institute of Australia.</p> <p>Design Review is a widely used and accepted form of improving design quality. In November 2022, the NSW Government released the Local Government Design Review Panel Manual to support a consistent approach to the way design review is conducted. As more multi-level residential developments are occurring in Albury in recent years there is merit in exploring the benefits of establishing a local design review panel or the like (or potentially as a regional design panel if interest from other Councils). However, there are also challenges that need to be considered including resourcing, costs, and potential difficulty in finding suitably qualified panel</p>

No.	Submitter name	Submission	Officer Response
		<p>9.4 The capacity of residential areas in proximity of the CBD and other growth areas to accommodate modest increases in housing (dual occupancy or townhouse development) may be underemphasised within the Strategy. Amending planning requirements for developments on laneways to enable housing to directly front these interfaces may promote opportunities to better utilise larger residential lots in well serviced locations.</p> <p>9.5 With a significant proportion of future growth continuing to be allocated to greenfield locations in Thurgoona Wirlinga, greater consideration should be given to enhancing the design, amenity and function of such areas. Promoting the fundamentals of human centric place-based design and best practice urban design should be encouraged to create great places to live and work. Opportunities to reduce car dependency and enhancement of active transport modes through the delivery of high quality active transport infrastructure as well as the concentration of housing (at a range of densities) in proximity to essential services and facilities should be strongly encouraged.</p> <p>9.6 Similarly, encouraging the redevelopment of greenfield sites to respond to their physical context and constraints should also be promoted to enhance amenity and future character. For example, enhancing the relationship of the built form environment with the natural environment through the development of interface policies that encourage housing to address recreational reserves and open spaces or incorporating infrastructure elements such as storm water management into the design and character of future developments are catalyst to shaping the future urban form of the city.</p> <p>9.7 The commitment to reviewing and updating the Albury Infrastructure Contributions Plan (2014) is commended and supported. Should this process be undertaken, it is recommended that consideration be given to amending the plan to differentiate between different housing sizes and proportional to the likely demands for infrastructure from these houses. At present, a blanketwide contribution is applied to all forms of residential development, which may inadvertently discourage smaller lot housing.</p>	<p>members. Defining the 'trigger' for Design Review and ensuring early input to avoid delaying the assessment process is also important.</p> <p><b>Recommended change: Add action under Strategy four to read:</b></p> <ul style="list-style-type: none"> <li>Investigate the establishment of a local or regional Design Review Panel (or similar model e.g. Design Advisory Panels, Design Excellence Panel) to provide constructive feedback on the design quality of large/significant development proposals.</li> </ul> <p>9.4 Existing planning provisions allow for development fronting laneways where suitable vehicle and pedestrian access, amenity and safety (including lighting and other Safer Design elements) can be demonstrated.</p> <p><b>No change to Strategy recommended.</b></p> <p>9.5 Noted. The matters outlined form part of the scope of Action 1.2 (page 58) being Review of the Thurgoona Wirlinga Precinct Structure Plan.</p> <p><b>No change to Strategy recommended.</b></p> <p>9.6 Noted. Many of these aspects raised were also addressed in the update to DCP Part 10 (Development in Residential Zones) that commenced in July 2020 (e.g. new guidance for residential interface with public open space and land in a Conservation zone). The matters outlined will also be further considered as part of the scope of Action 1.2 (page 58) being Review of the Thurgoona Wirlinga Precinct Structure Plan.</p> <p><b>No change to Strategy recommended.</b></p> <p>9.7 The suggestion to consider alternative methods of charging contribution rates to encourage smaller lot housing can be incorporated into the scope of Action 2.4 Review and update of the <i>Albury Infrastructure Contributions Plan</i>.</p> <p><b>Recommended change: Update Action 2.4 to add in specific reference to the project scope including consideration of investigating alternate contribution rate methodology so that it reads:</b></p> <p><b>Review and update the Albury Infrastructure Contributions Plan (2014) to</b></p> <p><b>a) incorporate findings of actions 2.1, 2.2 and 2.3</b></p> <p><b>b) consider alternate contribution rate methodology to encourage smaller lot housing.</b></p>

No.	Submitter name	Submission	Officer Response
		9.8 The recommendation to require social impact statements as part of planning proposals is questioned. It is uncertain as to what value such reports would have or whether they inadvertently add additional cost to development.	<p>9.8 Section 4.15(b) of the NSW <i>Environmental Planning and Assessment Act (1979)</i> requires Council to consider the likely social, environmental and economic impacts of planning proposals.</p> <p>During community consultation for the draft Local Housing Strategy, the need for more social and community infrastructure to support housing was a key issue raised. It is good practice to have social impact assessments, especially for significant rezoning proposals, major developments and other Planning Proposals which are likely to have significant social impacts. As such Strategy 10 outlines that Social Impact Assessments are only required for larger or more significant rezonings or developments which are likely to have significant social impacts.</p> <p><b>No change to Strategy recommended.</b></p>
10	Ambrose Marquart on behalf of the NSW Land and Housing Corporation	<p><b>Verbatim copy of submission in Attachment 2. Extracts of main issues copied below:</b></p> <p>10.1 Suggested amendment to the definition of social housing</p> <p>10.2 Suggestion to confirm social housing waitlist data</p> <p>10.3 Recommended amendment to the existing text (Table 1 on page 14) on the basis it tends to inflate the Australian Government's role in financing social housing, as follows:</p> <p>Commonwealth Government – Policy levers impact primarily on housing demand. Responsible for taxation settings such as benefits given to investors (i.e., negative gearing and capital gains tax reductions), and provision of welfare support (Commonwealth Rent Assistance). Also provides finance to support new supply of social and affordable housing through the National Housing Finance and Investment Corporation. This is in addition to what is provided by the NSW Government.</p>	<p>10.1 Minor amendment accepted.</p> <p><b>Recommended change: Include the term “community housing” (page 7) definition of social housing so it reads:</b>  <b>Social housing includes what is commonly referred to as public housing or community housing.</b></p> <p>10.2 New data is now available on expected waiting times for general applicants to social housing in Albury (allocation area S091). The data quoted on page 11 of the draft Local Housing Strategy is publicly available on the NSW Department of Communities &amp; Justice website at <a href="https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times">https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times</a></p> <p><b>Recommended change: Update the social housing waitlist data (page 11) and include a footnote referencing the data source so that reads:</b>  <b>As at June 2022, there were 465 general applicants and 39 priority applicants, forming a total of 504 applicants on the waitlist for social housing in Albury<sup>2</sup>.</b></p> <p>10.3 Noted however change not warranted as would complicate plain English and high-level overview of text.</p> <p><b>No change to Strategy recommended.</b></p>

No.	Submitter name	Submission	Officer Response
		<p>10.4 Suggestion to make additional reference to collaboration between levels of Government</p> <p>10.5 Suggestion to confirm the accuracy of data on Community Housing Providers</p> <p>10.6 Suggestion to replace the description of social housing in the Albury LGA at Page 49 with:</p> <p><i>In Albury LGA, there is a large supply of 3-bedroom social housing cottages most of which were built in the 1960s and 1970s, for a different time and a different need. This contrasts demand for 0-2 bedroom dwellings to more appropriately house people and families on the waitlist.</i></p> <p>The amendment better aligns with LAHC's Albury Local Area Analyses (November 2021).</p> <p>10.7 Suggestion to amend data on social housing findings from the Evidence Paper</p>	<p>10.4 Minor amendment accepted.</p> <p><b>Recommended change: Include the term "other levels of government" (page 15) so that it reads:</b>  <b>Actions from this Local Housing Strategy will be implemented in collaboration, partnership and consultation with private developers, community housing providers, other levels of government and our community.</b></p> <p>10.5 New data is now available on the National Regulatory System for Community Housing (NRSCH) Website at <a href="https://www.rch.nsw.gov.au/reports/Yearly-Reporting">https://www.rch.nsw.gov.au/reports/Yearly-Reporting</a></p> <p><b>Recommended change: Update the data (page 48) and include a footnote referencing the data source so that it reads:</b>  <b>As at June 2022, there were 176 registered CHP's in NSW, of which 25 and Tier 1 providers and 20 are Tier 2 providers.</b></p> <p>10.6 Change not warranted as existing description is considered an accurate summary of feedback received during community consultation. The proposed description wording is already referenced (page 49) in the 'Key social housing findings from the Evidence Paper' summary (as amended by change at 10.7 below).</p> <p><b>No change to Strategy recommended.</b></p> <p>10.7 Minor amendments accepted.</p> <p><b>Recommended change: Improve the clarity and accuracy of quoted data (page 49) so that it reads:</b></p> <ul style="list-style-type: none"> <li>• <b>There are around 970 social housing dwellings owned by LAHC in the Albury LGA. Of these:</b> <ul style="list-style-type: none"> <li>– About 60% are 3 to 4 bedroom cottages most of which were built in the 1960s and 1970s.</li> <li>– About 70% accommodate 1 or 2 person households, indicating many under occupied homes.</li> </ul> </li> <li>• <b>The median age of tenants is 49, almost 10 years higher than the average for Regional NSW.</b></li> <li>• <b>As of June 2022, there were 504 applicants on the social housing waitlist for Albury.</b> <ul style="list-style-type: none"> <li>– <b>More than 300 of households on the waitlist are single people or couples applying for either 1 or 2 bedroom homes.</b></li> </ul> </li> </ul>

No.	Submitter name	Submission	Officer Response
		<p>10.8 Suggestion to remove the paragraph referring to the Housing SEPP as the SEPP is being reviewed and the controls therein could be amended.</p> <p>10.9 Recommendation to update target for new social housing delivery to number instead of percentage</p> <p>10.10 Suggested amendment to the types of development able to access contributions waivers</p>	<p>10.8 Noted however an update to text based on Housing SEPP information from <a href="https://www.planningportal.nsw.gov.au/housing-policy-eie">https://www.planningportal.nsw.gov.au/housing-policy-eie</a> is preferred over deletion.</p> <p><b>Recommended change: Improve the accuracy and source referencing of information (page 50) so that it reads:</b>  <b>The NSW State Environmental Planning Policy (Housing) 2021 (Clause 42) currently allows for residential development carried out by, or on behalf of, the NSW Land and Housing Corporation that results in 60 dwellings or less on a single site being eligible for development to be carried out without Council consent. Proposed amendments are under consideration by the NSW Government to increase self assessment powers for residential development containing up to 75 dwellings.</b></p> <p>10.9 Minor amendment accepted</p> <p><b>Recommended change: Improve the accuracy of quoted data at page 50 and 62 so that it reads:</b>  <b>1. Under the Collaboration Agreement, work with NSW Land and Housing Corporation to deliver 540 new social housing dwellings by 2032.</b></p> <p>10.10 Minor amendment accepted</p> <p><b>Recommended change: Improve the clarity of information at Action 8.2 (page 61) so that it reads:</b>  <b>8.2 Ensure all eligible seniors housing and affordable housing development applications continue to be exempted from development contribution levies to help reduce development costs (section 7.11 and 7.12 of the Albury Infrastructure Contributions Plan 2014).</b></p>
11	Rebecca Willott on behalf of School Infrastructure NSW (SINSW)	<p><b>Verbatim copy of submission in Attachment 2. Extracts of main issues copied below:</b></p> <p>Strategy Two of the draft Strategy identifies a need for infrastructure (including schools) to match the housing growth in the Thurgoona Wirlinga Growth Area. SINSW is currently working with Council to meet the service need requirement in this precinct.</p> <p>The draft strategy also notes that Council is planning to review the Precinct Structure Plan for Thurgoona Wirlinga in 2023-2024. This will include a revised staging plan to promote orderly development and support the planning for services and infrastructure to meet the incoming population.</p> <p>11.1 SINSW request the opportunity to be engaged as a part of this review.</p>	<p>11.1 Noted. Council will continue to consult, and engage with, School Infrastructure NSW as is currently occurring, and will continue to advocate for further public school facilities in the Thurgoona Wirlinga growth area.</p> <p><b>No change to Strategy recommended.</b></p>

No.	Submitter name	Submission	Officer Response
		<p>SINSW also note Table 5 of the draft strategy identifies two different sources of projections (.id Forecast and NSW DPE Forecast). It is noted that the DPE Forecast shows significantly higher growth than the alternative.</p> <p>11.2 SINSW request that Council provide clarification on how it utilises the .id Forecast and DPE projections in planning for future housing in the LGA as well as provide indicative staging for this development (if available).</p> <p>SINSW is committed to working with Council to ensure schools are supporting community needs and continue to be appropriately resourced to respond to student population changes.</p> <p>As a result, SINSW request ongoing engagement with Council regarding any future growth and change identified for the growth precincts within the LGA.</p> <p>11.3 SINSW requests that transport planning for the LGA be guided by the NSW Governments Movement and Place Framework (MAPF) and its Built Environment Performance Indicators. These indicators are based on qualities that contribute to a well-designed built environment and should be used by proponents in the formulation of transport concepts.</p> <p>Further, SINSW is actively engaging with Council on the active transport arrangements and road network around Thurgoona Public school. SINSW welcomes on-going consultation with Council regrading transport and access issues in the LGA.</p>	<p>11.2 Noted. .id Forecast and NSW DPE Forecast are regularly reviewed and updated to respond to new data (e.g. 2021 Census) and trends identified. Our City Planning team considers both datasets, along with other considerations in our forward planning. These datasets demonstrating high levels of growth have also been utilised in past advocacy for further public school facilities in the Thurgoona Wirlinga growth area. Council will continue to consult with School Infrastructure NSW as is currently occurring.</p> <p><b>No change to Strategy recommended.</b></p> <p>11.3 Noted. These documents are being explored in our transport planning including development of our Two Cities One Community Integrated Transport Plan. The Movement and Place Framework also forms part of the scope of Action 1.2 (page 58) being Review of the Thurgoona Wirlinga Precinct Structure Plan. Council will continue to consult, and engage with, School Infrastructure NSW in this regard as well.</p> <p><b>No change to Strategy recommended.</b></p>



## Thurgoona Community Action Group



Albury City Council  
553 Kiewa St  
Albury 2640

### RE: Draft Albury Local Housing Strategy

Thurgoona Community Action is a group of people that represents the Thurgoona – Wirlinga community, ensuring and advocating for future development in the region that is balanced and beneficial including promotion of liveability, healthy lifestyle choices and amenity. Our group appreciates Council giving us time to allow the group to make a submission on the draft housing strategy.

TCAG congratulates Council on moving forward with this initiative. Developing an Albury Local Housing Strategy provides the opportunity for a detailed planning framework to be put in place that assists in the delivery of housing that better meets the needs and preferences of our growing population.

Yet it is TCAG's overall concern that there is a lack of congruency/alignment between this draft strategy and other higher-level documents such as the towards Albury 2050 strategic plan or the draft Two Cities One Community (2C1C) Strategic Plan where the Community have stated its preferences. Specifically:

- The number two priority in the 2C1C plan was liveability. Under the theme 'community' the number three priority was "We are a liveable community, connected to our region and other cities" whilst lower at number four was "We will advocate for increased housing diversity including affordable and sustainable developments"
- Similarly the number one priority in Albury 2050 is "Albury is a liveable city supporting sustainable population growth through the provision of high-quality infrastructure, industry-leading services and high levels of amenity" There is also mention about a "caring and healthy" and a "safe, inclusive and accessible" communities being a high priority.

It is therefore unclear to TCAG how a draft vision for the housing strategy can be one that does not consider these major preferences: that there is a need for liveable communities with adequate open space, recreation facilities, and amenity. Instead the vision has a sole focus on nature of the houses: "*Diverse, well-designed and affordable housing opportunities will continue in our planned Thurgoona Wirlinga Growth Area supported by our Structure Plan, and also within existing urban areas through sensitive infill development, particularly around our activity centres which provide good access to service and facilities*"

This draft vision needs to be changed so it explicitly considers the outcome as a result of housing rather than simply the houses themselves. Critical to any housing is the 'setting' these developments create and that it is people, and the subsequent communities that develop, who have aspirations about their life, wellbeing, and families that are a central issue.

Similarly the proposed four pillars of: affordability, diversity, supply, and resilience, while being consistent with the NSW Government's Housing 2041 strategy, do not consider what the local community have stated as a priority for the Albury LGA. If Council believes there is a need for strategic alignment of a local housing strategy with a state housing strategy, by all means have the four pillars, but include an additional pillar that provides a local context to what the residents have told Council about its preferences: such as those outlined in Albury 2050 and the 2C1C Strategic Plan.





## Thurgoona Community Action Group

TCAG's strong hope is that there will be a redrafted strategy produced than conceptualises housing not as the outcome, but that 'housing' is simply an activity that helps us create liveable communities that provide a safe, healthy place for people with diverse backgrounds to live and co-exist. As such there will be much stronger alignment with the preferences and visions that the community have already provided Council in the Albury 2050 strategic plan and the draft Two Cities One Community (2C1C) Strategic Plan.

Please review and change the draft so the final document is one that considers the priorities the community have stated not remain as one that has narrowly and selectively picked a few actions amongst the entire list.

Yours sincerely,



Jonathon Howard On behalf of TCAG





**From:** Lee Street | Canopy Living <[REDACTED]>

**Sent:** Monday, 13 February 2023 5:35 PM

**To:** [REDACTED]

**Subject:** Draft Albury Local Housing Strategy : Feedback : SDA Developer, Canopy SDA

Dear Sonia,

Our organisation, Canopy SDA is a property group that specialises in the planning, construction and management of Specialist Disability Accommodation Housing providing new builds within the NDIS scheme for people living with disability.

We build sustainable SDA properties to passive house specifications and have a clear mission to provide quality, eco-friendly, fit for purpose SDA properties utilising innovation, automation, and thoughtful designs to deliver an improved quality of living to our residents, reducing their utility costs, enabling them to live in areas they want to live in, with access to all they require easily and hence we seek well located residential infill sites within Albury.

In terms of the Draft feedback, I have compiled sections from the Draft of relevance to our line of business and our comments in green below.

**Our category: Specialist housing Accommodation** designed for unique needs such as housing for people with disability (including group homes) or older people (such as residential care units)

**Consultation Findings:**

Undertake partnership projects using Council or other Government owned land Moderate Help the Community Housing sector and Specialist Disability Accommodation sector to grow, but don't do their job for them. Identify Council, Crown Lands or other public owned lands that could be suitable for mixed tenure residential development, but don't act as the developer.

**Our Comments:** We agree.

**Key Strategies of Interest**

Strategy 1: Support delivery of new residential infill to achieve a better balance with new greenfield development

Strategy 2: Ensure all new housing development is properly supported by infrastructure

Strategy 6: Promote the importance of access to housing that meets universal design principles

Strategy 12: Encourage design and delivery of sustainable homes

**Strategy One: Support delivery of new residential infill to achieve a better balance with new greenfield development**

In the short to medium term, encouraging compatible infill development around activity centres at Albury City Centre and Lavington City Centre is most likely to provide more housing options with good access to public transport, parks, shopping centres, schools and other important social infrastructure. Council has already identified some urban renewal opportunities in the Albury and Lavington City Centres through its CBD Master Plans. Renewing large, consolidated sites in these locations can act as anchors for the City Centres, improving amenity, providing housing, and opportunities for new businesses and services.

**Comment:** This strategy is critical to enabling providing quality SDA housing in areas that are best suited to people living with disability. Typically, developers have sought outer areas with less infrastructure to take advantage of cheaper land prices, however we believe that this does

not provide the necessary social infrastructure people living with disability require to live accessible, happy, quality lives with easy access and transport options. We have identified Albury and Lavington as key locations for infill opportunities, and we wholly support Council in strategy 6, further enabling our mission and vision for our resident's quality of life.

**Strategy Two: Ensure all new housing development is properly supported by infrastructure**

- Wide range of existing infrastructure already available supports efficient use

Comment: review and enhancement of footpaths in infill areas is a key desirable for developers who are sourcing infill land for Specialist Disability Accommodation. Footpaths for wheelchair users is critical and highly desirable to use.

**Noted:** Key groups in need of more 'missing middle' market choice of housing size and price options include older people wanting to 'downsize', people with disabilities, students and visiting workforces (especially health workers). Albury needs to change the flow of new housing so more non-detached product is brought to market, moving towards providing more variety in the overall mix of our housing stock.

Comment: We welcome any further support specifically to SDA Developers from Council as we enable the housing expansion of the 'missing middle' market. Particularly in SDA as a sub-category. Speed of the development process and approvals is paramount. SDA is quintessentially a public housing program funded by the Federal Government through the NDIS scheme, and SDA developers will benefit from support from Councils to fast-track development applications outside of CDC frameworks for our applications and enable us to build more stock more quickly and support government initiatives such as YPIRAC (Young People in Residential Aged Care Centres) national targets and support community members living with disability to move into fit for purpose and appropriate homes more quickly.

**Strategy 6: Promote the importance of access to housing that meets universal design principles**

Strategy six Action Plan: 1. Advocate for raising the requirements for housing to meet higher adaptable standards 2. Promote information on flexible housing design on Council's website 3. Maintain existing requirements for universal design features in new apartment dwellings 4. Include more objectives and advice on universal design in the next review of the Albury DCP

Comments: Agree with Strategy 6 Action Plan. This action plan is a broader concept that provides long term stock viability in addition to the growth of SDA stock in the region catering specifically for persons who fit the criteria within NDIS. As SDA is approximately 6% of the total NDIS participant pool, we commend the ACC for this broader initiative to support people living with disability in their region.

**Resilience Strategies**

Objective: To deliver housing that is matched to community and environmental goals so that Albury's residents feel safe, connected, comfortable and limit their impact on the natural environment. Creating sustainable and comfortable places to live that are adapted to Albury's changing climate, reducing people's exposure to extreme temperatures and lowering energy costs, making sure homes are built safely and last a long time.

**Strategy twelve: Encourage design and delivery of sustainable homes**

12.1 Undertake advocacy and education initiatives for residents and builders encouraging and promoting sustainable development that is 'beyond BASIX' standards, such as: • Light coloured roofs • Passive design elements (siting/orientation, shading and solar access, eaves, cross ventilation, insulation) including pathways to achieve Passive House certification • 'Circular Economy' principles, especially diversion of construction/ building waste from landfill • Ways

to reduce the costs of constructing resilient homes • Support for trials and initiatives that include renewable power supply/ sharing (energy hubs and mini grids) shared battery arrangements in new developments, particularly where there is benefit to our most vulnerable communities • Electric Vehicle 'EV' readiness • Preparing for risks of extreme weather events (flooding, bushfire, storms, drought and heatwaves)

**Our Comments:**

All Canopy SDA homes are built to Platinum LHA standards.

We welcome involvement in future forums and events to advise and educate upon sustainable building practices we utilise in our developments which incorporate these Resilience Strategies. Our healthy, green, and connected designs reduce utility costs associated with rental for resident's outgoings due to our passive house design, solar panels, triple glazed windows and timber supplied from sustainable timber forests.

We build our properties in our state-of-the-art factory in Campbelltown through Modern Method of Construction (MMoC) which is the most efficient and sustainable method for housing construction in the 21<sup>st</sup> Century. We use biophilic designs, heat ventilation recovery systems (HVC) which supports our residents in their need for reliable and efficient heating and cooling, most importantly, at a fraction of the cost.

We agree with strategy 12 in the plan. This is essential and we commend your commitment to building a resilient housing community.

This concludes our feedback. Thank you for the opportunity to provide our views.

Should you wish to discuss further, my details are below.

Regards

Lee

**Lee Street**

Head of Strategy and Customer Experience



Specialist Disability Accommodation

**Canopy Living PTY LTD**

m: [REDACTED]

e: [REDACTED]

[www.canopyliving.com.au](http://www.canopyliving.com.au)

[REDACTED]



Registered NDIS Provider

13 February 2023

Albury City Planning Team  
Albury City Council  
PO Box 323  
ALBURY NSW 2640

Attention: Albury City Planning Team

Via Email

Dear Sir/Madam,

**Re: Submission to Draft Albury Local Housing Strategy**

Thank you for opportunity to provide feedback in relation to the Draft Albury Local Housing Strategy ('the Strategy'), currently on exhibition by Albury City Council ('Council'). The Strategy outlines the current and future housing needs of the City of Albury, sets a framework for the location and typologies of housing required to address these needs into the future and specifies a series of strategies to address the key themes of supply, diversity, affordability and resilience.

We preface this submission with an acknowledgement of Council's commitment to the preparation of this Strategy and emphasise the importance of such strategic work in seeking to not only address a series of significant challenges but also recognising the immense potential present in the evolution of the city into the future.

In a general sense we agree with the analysis and research base underpinning the Strategy and support the proposed objectives, strategies and key actions items outlined to assist in managing and promoting growth into the future. Notwithstanding this, the following submission outlines areas for further consideration in the finalisation of the Strategy moving forward.

- Greater emphasis could be placed on the concentration of development at higher densities to locations that are well serviced by amenities, public transport accessibility and open spaces, such as the Albury CBD, Lavington and South Albury. While the Strategy does promote this theme, we feel greater emphasis could be placed in highlighting the role and function of such areas in accommodating growth into the future. The commitment to undertaking comprehensive master planning and structure planning processes for future potential growth areas is strongly supported.
- The potential of underutilised Council and State own land as providing opportunities for redevelopment could be further emphasised throughout the Strategy. Sites such as the Council Depot or former Flour Mill Site present clear opportunities to accommodate future growth, including the delivery of affordable housing, and should be further promoted.
- With a greater proportion of development being allocated to inner urban areas, the promotion of high quality, sustainable and site responsive design should be encouraged further. Opportunities for council to support the sponsorship of a design excellence award or similar may be beneficial in promoting high quality outcomes. Similarly, the provision of urban design reviews of all multi-level developments could also be considered in enhancing the amenity and design of development.

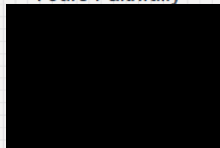


- The capacity of residential areas in proximity of the CBD and other growth areas to accommodate modest increases in housing (dual occupancy or townhouse development) may be underemphasised within the Strategy. Amending planning requirements for developments on laneways to enable housing to directly front these interfaces may promote opportunities to better utilise larger residential lots in well serviced locations.
- With a significant proportion of future growth continuing to be allocated to greenfield locations in Thurgoona Wirringa, greater consideration should be given to enhancing the design, amenity and function of such areas. Promoting the fundamentals of human centric place-based design and best practice urban design should be encouraged to create great places to live and work. Opportunities to reduce car dependency and enhancement of active transport modes through the delivery of high quality active transport infrastructure as well as the concentration of housing (at a range of densities) in proximity to essential services and facilities should be strongly encouraged.
- Similarly, encouraging the redevelopment of greenfield sites to respond to their physical context and constraints should also be promoted to enhance amenity and future character. For example, enhancing the relationship of the built form environment with the natural environment through the development of interface policies that encourage housing to address recreational reserves and open spaces or incorporating infrastructure elements such as storm water management into the design and character of future developments are catalyst to shaping the future urban form of the city.
- The commitment to reviewing and updating the Albury Infrastructure Contributions Plan (2014) is commended and supported. Should this process be undertaken, it is recommended that consideration be given to amending the plan to differentiate between different housing sizes and proportional to the likely demands for infrastructure from these houses. At present, a blanket wide contribution is applied to all forms of residential development, which may inadvertently discourage smaller lot housing.
- The recommendation to require social impact statements as part of planning proposals is questioned. It is uncertain as to what value such reports would have or whether they inadvertently add additional cost to development.

In summary, we thank you for the opportunity to provide feedback in relation to the development of this Strategy and would welcome the opportunity to discuss any of the matters raised in this submission with you further.

Should you have any queries please contact the undersigned directly on [REDACTED] or [REDACTED]

Yours Faithfully



**David Hunter**  
Director

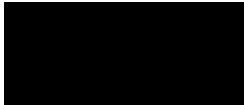
## Department of Planning and Environment



Should you require any further information or wish to discuss our comments, please contact Ambrose Marquart on [REDACTED] or by email at [REDACTED]

We look forward to continuing to work with Council on the Draft Housing Strategy and other housing initiatives.

Yours sincerely



Director, Portfolio Services  
NSW Land and Housing Corporation

Our ref: D23/258016

[REDACTED]  
Albury City Council  
PO Box 323  
Albury NSW 2640

09 February 2023

---

**Subject: Draft Albury Local Housing Strategy**

Dear [REDACTED]

Thank you for the opportunity to provide feedback on the Draft Albury Local Housing Strategy (Draft Housing Strategy). This letter provides comments on the Draft Housing Strategy with a focus on the delivery of social and affordable housing within the Albury Local Government Area (LGA) as outlined in the Collaboration Agreement (March 2022) between Albury City Council (Council) and the NSW Land and Housing Corporation (LAHC).

LAHC supports the Draft Housing Strategy as it generally aligns with the Collaboration Agreement and is consistent with the mutual aims of Council and LAHC to increase the supply of social and affordable housing and to ensure a targeted improvement in housing diversity in the Albury LGA.

LAHC owns over 970 dwellings in the Albury LGA, which represents approximately 4% of dwellings in the LGA. The majority of LAHC's current portfolio in the LGA (60%) comprises dwellings with 3 or more bedrooms, however the greatest demand is for dwellings with up to 2 bedrooms (70% of waitlist). LAHC is therefore prioritising building new 1 and 2 bedroom dwellings that are well located close to transport and amenities, to provide fit-for-purpose housing that better aligns with demand and improves tenant experiences.

Please find attached comments on the Draft Housing Strategy for Council's consideration (**Attachment 1**). LAHC wishes to be involved throughout the process of developing and finalising the Housing Strategy and would welcome the opportunity to work with Council to ensure the best outcome is achieved for the community and an appropriate range of dwelling types can be delivered across the LGA.

Attachment 1

Comments on the Draft Albury Housing Strategy (ALHS)			
	Draft ALHS Reference	Matter	Comment
1	Page 7	Definition of social housing	LAHC suggests a minor amendment, as follows: 'Housing for people on low incomes or people in housing crisis, which the government or community housing providers own or manage. Rents are based on income. Social housing includes what is commonly referred to as public housing or community housing.'
2	Page 11	Waitlist data	LAHC suggests Council confirm with Dept. of Communities and Justice (DCJ) the waitlist figure of 359 applicants. Internal LAHC figures indicate the waitlist is 397 as at June 2021.
3	Page 14	Table 1: The roles of different levels of Australia's governments in housing policy	LAHC recommends a minor amendment as the existing text tends to inflate the Australian Government's role in financing social housing, as follows: 'Commonwealth Government – Policy levers impact primarily on housing demand. Responsible for taxation settings such as benefits given to investors (i.e., negative gearing and capital gains tax reductions), and provision of welfare support (Commonwealth Rent Assistance). Also provides finance to support new supply of social and affordable housing through the National Housing Finance and Investment Corporation. This is in addition to what is provided by the NSW Government.'
4	Page 15	Collaboration	LAHC suggests a minor amendment, as follows: 'Actions from this Local Housing Strategy will be implemented in collaboration, partnership and consultation with private developers, community housing providers, other levels of government and our community.'
5	Page 48	Definition of CHPs	LAHC suggests the information referring to the number and type of registered CHPs be updated based on data from the Registrar of Community Housing website ( <a href="https://www.rch.nsw.gov.au/data/assets/pdf_file/0010/839998/Annual-Statement-of-Performance-2021-2022.pdf">https://www.rch.nsw.gov.au/data/assets/pdf_file/0010/839998/Annual-Statement-of-Performance-2021-2022.pdf</a> ) which indicates that as of June 2022, there are currently 176 registered CHPs in NSW, of which 25 are Tier 1 providers, 20 are Tier 2 providers and 131 are Tier 3 providers.
6	Page 49	Description of social housing in LGA	LAHC suggests replacing the following text: 'Albury's social housing stock is ageing and is no longer meeting the needs of residents. There is a major shortfall in social housing designed for one and two person households. More people are ending up on waitlists for social housing, with average wait times currently between 2 and 5 years for most dwelling types.' with: 'In Albury LGA, there is a large supply of 3-bedroom social housing cottages most of which were built in the 1960s and 1970s, for a different time and a different need. This contrasts demand for 0-2 bedroom dwellings to more appropriately house people and families on the waitlist.' The amendment better aligns with LAHC's Albury Local Area Analyses (November 2021).
7	Page 49	Key social housing findings from the Evidence Paper	LAHC suggests the following minor amendments to ensure clarity and accuracy of data: <ul style="list-style-type: none"> <li>There are around 970 social housing dwellings owned by LAHC in the Albury LGA. Of these:</li> </ul>



			<ul style="list-style-type: none"> <li>- About 60% are 3 to 4 bedroom cottages <b>most of which</b> were built in the 1960s and 1970s.</li> <li>- About 70% accommodate 1 or 2 person households, indicating many under occupied homes.</li> <li>• The median age of tenants is <b>49, almost</b> 10 years higher than the average for Regional NSW.</li> <li>• As of June <b>2021</b>, there were 349 households on the social housing waitlist in Albury. <ul style="list-style-type: none"> <li>- More than 300 of households on the waitlist are single people or couples applying for either 1 or 2 bedroom homes.</li> </ul> </li> </ul> <p>The 2022 waitlist figure appears to be for 2021. As above, LAHC suggests Council confirm with DCJ the waitlist figure.</p>
<b>8</b>	Page 50	Housing SEPP	LAHC suggests removing the paragraph referring to the Housing SEPP as the SEPP is being reviewed and the controls therein could be amended.
<b>9</b>	Page 50 Table 11 (Action 9.1)	Target	<p>LAHC recommends deleting reference to a social housing target increase of 20% by 2032 and replacing with the following target:</p> <p>‘Under the Collaboration Agreement, work with NSW Land and Housing Corporation to <b>deliver 540 new</b> social housing dwellings by 2032.’</p> <p>This is because a 20% target is not referenced in LAHC media releases or in the Collaboration Agreement between Council and LAHC.</p>
<b>10</b>	Table 11 (Action 8.2)	Contributions	<p>LAHC suggests a minor amendment, as follows:</p> <p>‘Ensure all <b>seniors housing and eligible</b> affordable housing development applications continue to be exempted from development contribution levies to help reduce development costs (section 7.11 and 7.12 of the Albury Infrastructure Contributions Plan 2014).’</p> <p>This wording is consistent with the exemptions in section 3.7.1 of the Albury Infrastructure Contributions Plan 2014.</p>



Education

2 March 2023

City Planning Team  
Albury City Council  
PO Box 323  
Albury NSW 2640

Attention: [REDACTED]

**RE: SINSW SUBMISSION – DRAFT ALBURY LOCAL HOUSING STRATEGY**

Dear [REDACTED]

School Infrastructure New South Wales (SINSW), as part of the Department of Education (DoE), welcomes the opportunity to provide comments on both the draft Albury Local Housing Strategy (the draft Strategy) and the Albury Conservation Lands Review.

SINSW has reviewed the draft Local Housing Strategy and provided detailed comments in the attachment below. SINSW understand that the NSW Department of Planning and Environment (DPE) projections estimate that an additional 8,352 dwellings will be required beyond 2021 supplies (to 2036) in the LGA, while development in long term growth precincts such as Thurgoona Wirringa are estimated to require approximately 14,000 – 21,000 dwellings (to 2060). SINSW has also included an overview of how schools are planned for within the Albury Local Government Area (LGA).

Planning for schools is greatly improved when SINSW has a clear understanding of growth proposed by Councils in their housing strategies and generated through planning proposals. SINSW welcome ongoing discussions as Council progresses strategic planning projects for growth areas within the LGA.

Please note, the commentary in this letter is based on the projected population and dwelling yields for the LGA noted in the draft Strategy. DPE and Council have a joint obligation to monitor growth and ensure school sites are made available if/when development yield exceeds approved numbers.

Should you require further information about this submission, please the SINSW Strategic Planning Team at [REDACTED]

Yours Sincerely,

[REDACTED]

**Rebecca Willott**

**Executive Director, Infrastructure Planning**

## **ATTACHMENT – DRAFT ALBURY LOCAL HOUSING STRATEGY**

### **Planning for Schools**

SINSW has undertaken school planning for the Albury Local Government Area (LGA) to better understand where and when additional school provision is required and where the school population is likely to remain stable or decline so that the most appropriate school asset solutions can be identified.

SINSW observe a strategic, place-based approach to school planning that considers changes in land use and supporting infrastructure, so that schools will keep pace with enrolment growth and changing accommodation needs. The approach to planning for schools is outcomes focussed and aims to ensure:

- Provision of fit-for-purpose educational facilities for the local community that support contemporary learning practices.
- Availability of access to high quality education for all students.
- Realisation of community benefits through sharing of spaces and maximum use of school spaces.
- Future proofing when responding to the fast pace of demand because of new infrastructure and housing delivery in growth precincts and other emerging areas.
- Access to suitable facilities for students in areas with stable or declining population.

To plan for schools, the Department of Education considers a range of factors including long term trends in population growth, the likely uptake of new housing by those with school aged children, the ratio of government and non-government school attendance and the size and location of existing schools. As a first preference, and where appropriate, the DoE will optimise use of existing assets through solutions such as:

- Realigning school intake areas to appropriately manage growth in existing facilities where possible.
- Monitoring enrolments to provide priority to students living in the local school intake area.
- Renewing existing assets to provide contemporary teaching spaces and learning environments for students.
- Increasing the size, amenity and functionality of existing schools to manage growth whilst providing greater curriculum choices where possible.
- Using temporary classrooms to manage short term fluctuations in enrolment levels
- Working with schools and the wider department in identifying operational actions to increase enrolments in schools where there is capacity.
- Identify and secure land through mechanisms such as Voluntary Planning Agreements (VPAs) so that land is available and flexible to provide for educational facilities in the longer term.

To identify the most effective and efficient asset solutions in infrastructure planning, consideration is given to:

- New housing areas and intensified densities in existing residential neighbourhoods, and any changes to pre-existing plans.
- Demographic trends.
- Educational requirements.
- Asset condition and asset life cycle.
- Designated school intake area boundaries.
- Site sizes and other site constraints such as heritage listed buildings and/or trees, bushfire, flooding, slope, noise issues.
- Consolidation opportunities.
- Transport links
- Co-location with other services.
- Community feedback and partnership opportunities.

In cases of sustained and stable enrolments that are unable to be met through expanded facilities, DoE provides new schools, as necessary, having regard to the context and prioritisation of needs across the state.

What is needed to inform SINSW's analysis:

Having a thorough understanding of a proposed development within an LGA will improve the analysis of school demand. These details include:

- Number of dwellings proposed/lot size and separate numbers, if mixed
- Dwelling typology (low/medium/high density) and separate numbers, if mixed
- Planned staging/timing on an annual basis
- Status of planning proposal/development application
- Whether a Social Infrastructure Assessment has been completed
- Any major transport infrastructure proposals
- Provision of GeoJSON file of boundary for larger scale developments
- If a proposal is supported by an infrastructure delivery strategy
- Any environmental considerations affecting the proposal, such as bushfire, flooding, mine subsidence etc.

The recent *Local Environmental Plan (LEP) Making Guideline 2021* (prepared by the Department of Planning and Environment) outlines the following referral criteria for Planning Proposals to be sent to SINSW (refer to Appendix B of the Guideline):

- The proposal relates to land within Greater Sydney that will facilitate more than 250 additional dwellings.
- The proposal relates to land outside of Greater Sydney that will facilitate more than 100 additional dwellings/lots.
- The proposal makes provision for a new public primary and / or secondary school.
- The proposal is located on land adjacent to an existing public school and future development may impact on solar, daylight access, and privacy to the school site.
- The proposal includes new road infrastructure in the vicinity of existing schools

This new system will allow SINSW to monitor and consider the cumulative impact of Planning Proposals on the education service need within Local Government Areas.

### **Housing Growth and School Service Need**

There are ten primary and three secondary schools within the Albury LGA. SINSW has reviewed the growth proposed for the LGA in order to identify appropriate solutions to accommodate future projected enrolment demand. This will ensure that existing schools are fully utilised before new schools are considered. It is likely that future housing growth within the Albury LGA will affect the future student population across the primary and secondary government schools in the community. A combination of asset and non-asset solutions across the school groups may be required to accommodate future demand to 2036.

*Strategy Two* of the draft Strategy identifies a need for infrastructure (including schools) to match the housing growth in the Thurgoona Wirringa Growth Area. SINSW is currently working with Council to meet the service need requirement in this precinct.

The draft strategy also notes that Council is planning to review the Precinct Structure Plan for Thurgoona Wirringa in 2023-2024. This will include a revised staging plan to promote orderly development and support the planning for services and infrastructure to meet the incoming population. SINSW request the opportunity to be engaged as a part of this review.

SINSW also note *Table 5* of the draft strategy identifies two different sources of projections (.id Forecast and NSW DPE Forecast). It is noted that the DPE Forecast shows significantly higher growth than the alternative. SINSW request that Council provide clarification on how it utilises the .id Forecast and DPE projections in planning for future housing in the LGA as well as provide indicative staging for this development (if available).

SINSW is committed to working with Council to ensure schools are supporting community needs and continue to be appropriately resourced to respond to student population changes. As a result, SINSW request ongoing engagement with Council regarding any future growth and change identified for the growth precincts within the LGA.

### **Transport and Access**

SINSW requests that transport planning for the LGA be guided by the NSW Governments Movement and Place Framework (MAPF) and its Built Environment Performance Indicators. These indicators are based on qualities that contribute to a well-designed built environment and should be used by proponents in the formulation of transport concepts.

The MAPF's core 'Amenity and Use' and 'Primary Schools' indicators are of particular importance to SINSW, as these encourage urban designers to consider the impact on adjacent places/uses, as well as emphasising movement that supports place. The 'Primary Schools' indicator provides two specific metrics to judge the effect of infrastructure on the accessibility of public schools in an area;

these being walkability and public transport access. These metrics require designers to assess whether proposed infrastructure facilitates access to primary school facilities (or public transport connections to schools) or whether it exacerbates gaps in the network.

The primary school-focused MAPF amenity indicator can be accessed via the link below:

<https://www.movementandplace.nsw.gov.au/place-and-network/built-environment-indicators/primary-schools>

Effective transport planning for the LGA would include the following measures to promote safety, access and pedestrian prioritisation:

- Preparation of an Access and Movement Strategy
- Physical separation between pedestrians, cyclists and heavy vehicles
- Default lower vehicle speeds (e.g. School Streets)
- Access for all ages and abilities, such as ambulant disabilities and prams
- Kerb outstands and refuges crossings (particularly around schools).
- Pedestrian legs on all approaches to intersections (including signalised crossings)
- Weather-protected bus departure zones
- For local roads: lower vehicle speeds to 15 km/h in High Pedestrian Activity Areas or 40 km/h within School Zones.

Further, SINSW is actively engaging with Council on the active transport arrangements and road network around Thurgoona Public school. SINSW welcomes on-going consultation with Council regrading transport and access issues in the LGA.

[REDACTED]

[REDACTED]