



Environmental Planning Committee

Monday 3 June 2024
6.30pm

Late Correspondence

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Subject: LATE CORRESPONDENCE - EP - 3 JUNE 2024
Author: Sue O'Connor, Governance Officer
File No: 24/95702
Purpose of the Report: To table late correspondence as submitted for consideration by the Mayor and Councillors relevant to the Environmental Planning Committee held on 3 June 2024.
Alignment to Delivery Program: Strategy 11.3: Ensure effective and efficient governance and risk management.

Recommendation:

THAT the Environmental Planning Committee receives and notes the late correspondence and reads late correspondence in conjunction with the relevant Agenda items.

Please find attached late correspondence relating to matters appearing on the Agenda for the Environmental Planning Committee held on 3 June 2024. Correspondence received is listed below:

Item No.	Matter	Author	Page
R1	Submission of Precincts for Low & Mid-Rise Housing Reforms	Lyle Tamlyn - Acting Team Leader Strategic Planning	3

Memorandum

Date 3 June 2024

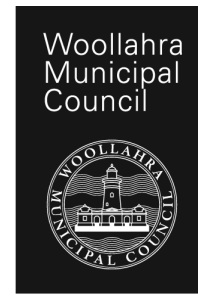
File No. SC7882
24/94905

To Mayor Cr Shields and Councillors

CC Executive Leadership Team
Kristy Welfare – A/ Manager Strategic Planning and Place

From Lyle Tamlyn – A/ Team Leader Strategic Planning

Subject LATE CORRESPONDENCE – ENVIRONMENTAL PLANNING COMMITTEE 3 JUNE 2024 - ITEM R1 SUBMISSION ON PRECINCTS FOR LOW AND MID-RISE HOUSING REFORMS



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Dear Mayor Cr Shields and Councillors,

Item R1 on the agenda for this evening's Environmental Planning Committee (EPC) relates to the Department of Planning, Housing and Infrastructure's (DPHI's) request for feedback on station and town centre precincts, to support the introduction of the low and mid-rise housing reforms.

The following recommendation has been suggested by staff:

THAT Council:

- A. *Receives and notes the report to the Environmental Planning Committee of 3 June 2024, and accompanying staff submission at Attachment 1, regarding the Department of Planning, Housing and Infrastructure's precinct selection for the low and mid-rise housing reforms across the Woollahra Local Government Area.*
- B. *Request the Mayor write to the Minister for Planning and Public Spaces, indicating Council's support for the staff submission and continued opposition to the low and mid-rise housing reforms.*

Following the finalisation of the EPC's agenda on 29 May 2024, the DPHI released new housing targets for Greater Sydney. These targets are designed complement the uplift envisaged in the low and mid-rise reforms. Accordingly, staff have provided information below to assist the EPC's consideration of Item R1.

What is the new target and how was it developed?

The DPHI has prescribed a target of 1900 net additional dwellings for the period July 2024 to June 2029. The figure is divided into 30% planned growth (570 new dwellings overall or 114 new dwellings per year) and 70% projected growth (1330 new dwellings or 266 new dwellings per year).

Planned growth is theoretically based on homes already in the pipeline for delivery, having regard to existing approvals or where rezonings have already occurred. Staff consider this amount has been established using our current target of 500 dwellings, as well as our stable net completions rate from 2016-2023 of 100 dwellings per year, noting that Council has no control over completions.

Projected growth is the expected delivery of homes that could occur based on the DPHI’s low and mid-rise housing reforms, taking into account existing infrastructure, ongoing investments and local constraints.

There is no evidence to suggest that uplift already proposed for the Edgecliff Commercial Centre or Double Bay Centre has been considered in developing the above growth figures.

Staff also note that section 3.4(7) of the *Environmental Planning and Assessment Act 1979* allows the DPHI to establish new housing targets before District Plans are updated.

How does this new target compare?

The *Woollahra Local Housing Strategy 2021* (Woollahra LHS) currently sets targets as follows:

- 2016-2021 - 300 dwellings;
- 2021-2026 - 500 dwellings; and
- 2026-2036 - 400 dwellings.

These add to a total of 1200 dwellings from 2016 to 2036.

Figure 1 below shows current housing targets, the new housing target and dwellings completed (until May 2023) on a yearly basis.

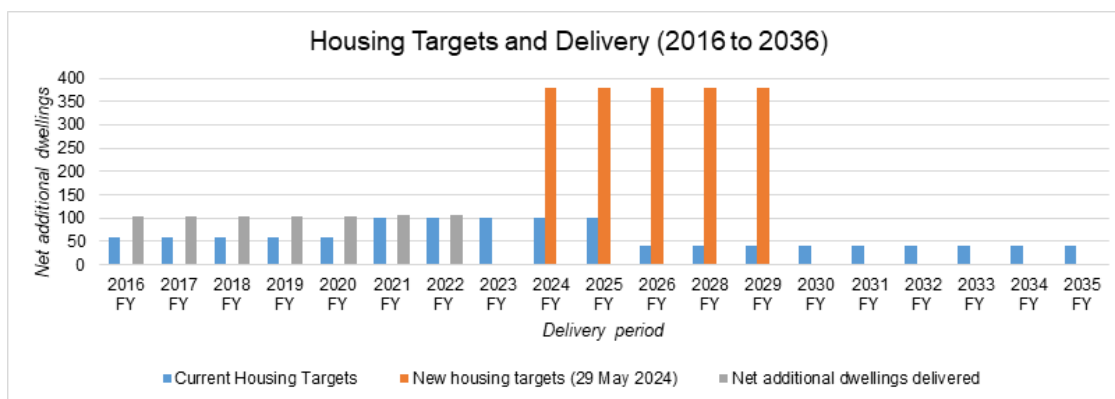


Figure 1: Comparison of current targets, new target and dwelling delivery 2016-2035.

Is the target likely to be realised in five years?

It is important to note that the target of 1900 net additional dwellings by 2029 is for *completions* rather than approvals. This means that the five year period has to capture the whole post-rezoning delivery process, including site acquisition, development application (DA) preparation, DA assessment and approval, construction certificate (CC) preparation, construction and occupation certificate (OC) issue.

A best case scenario for a typical site, with an analysis of likely issues, is shown in **Table 1** overleaf.

Table 1: Estimated progression of development site under reforms.

Stage	Timeframe	Potential Delays
Site acquisition	6 months	Strata scheme negotiations and conveyancing, noting much of the affected R3 Medium Density Residential land in some suburbs (e.g. Darling Point) has existing low-rise buildings.
DA materials preparation	6 months	Lack of availability of consultants, especially with increased sector activity from reforms.
DA assessment*	8 months	Significant non-compliances, particularly concerning amenity, built form and heritage conservation, stemming from the generous controls in reforms. These may also increase court appeals.
CC materials preparation	6 months	Issues satisfying conditions of consent, such as those for hydrogeological and contamination issues which are not considered in reforms.
Building construction*	27 months (2.25 years)	Known industry shortages in labour.
OC issue	2 months	Building defects.
Total	55 months (4.6 years)	

*DA Assessment is current gross days for LPP determination, noting most uplift would require the LPP. Building construction is the current LGA average for gap between CC and OC issue for new dwellings.

As shown above, a likely best case scenario would see a development being completed in just under five years, assuming the process started as soon as the reforms were implemented. Accordingly, staff view the proposed target as unrealistic. We also note that Council **only** has influence over two of the five steps of the process. This is concerning, as any repercussions for not meeting the targets (e.g. reduced planning powers) would be a result of the whole sector's performance, not just Council's.

Staff have also detailed the extensive local character, amenity and infrastructure implications that this level of development would cause in our submission to the reforms, and in our further response attached to this evening EPC's agenda.

Please note that the information provided here is the sum total of the information we have from DPHI on the recently announced housing targets. At the time of writing this memo, Council has not been provided with any background information that demonstrates how this revised housing target was reached i.e. information such as modelling, infrastructure needs assessments, traffic studies etc.