



**RED HEAD VILLAGES ASSOCIATION (Inc)**

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**Red Head Villages Association Inc Submission 2024**

**NSW Government – ‘Changes to Create Low and Mid-Rise Housing’**

The Red Head Villages Association Inc (RHVA Inc) represents residents, ratepayers, and visitors in five coastal villages of the Shoalhaven Region, NSW. Additionally, RHVA Inc serves as a registered Shoalhaven City Council Community Consultative Body. The association's membership is diverse, including permanent residents, holiday home owners, and long-term visitors who all share a love for the area's pristine beaches and coastal foreshores surrounded by National Parks.

In essence, the RHVA Inc generally supports the NSW Government's policy in response to the national housing crisis by aiming to enhance the planning system with a focus on modern urbanism principles. However, the RHVA Inc also provides some critique and crucial context in the planning discussion, considering various factors such as land use diversity, ecosystems, ecology, character, and the desired future community harmony that may be affected by the proposed reforms to the NSW planning system.

**Note:** This submission also contains input from the Red Head Villages environmental association Manyana Matters Environmental Association (MMEA) in the section on dual occupancy.

Annotation	<i>“A suite of proposals aims to encourage more low and mid-rise housing options for NSW households in suitable locations and with good design”</i>
Position	<b>Qualified support</b>
Comment	Support a focus on significantly increased social and affordable housing for NSW residents and families while avoiding past failures in planning policy responsible for social, economic and environmental deficits. Support ‘in the right places and well designed’ with a focus on sustainable living

Annotation	<i>“In-fill development, making sure new housing is built in locations that are well serviced by infrastructure and have capacity for growth”</i>
Position	<b>Supportive</b>
Comment	RHVA Inc supports the opportunity for ‘in-fill development’ as stated in the proposed policy, “more houses are best placed in areas that are well serviced by town centres and good public transport,” again

	adhering to the good planning principles reflecting modern urbanism. While controlled in-fill development may pose challenges to the current community, transparent consultation and education of the public can lead to shared desired outcomes and sustainable development.
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Annotation	<p><i>“To enable more diverse, well-designed low rise and mid-rise housing near established town centres and in areas where there is good public transport”</i></p> <p><i>“More people will be able to live within walking distance of supermarkets, restaurants and good public transport to get them to work and other places”</i></p>
Position	<b>Supportive</b>
Comment	RHVA Inc views such policy perspectives as positively reflecting the principles of ‘modern urbanism’ delivering increased and improved housing options while pro-actively reinforcing additional Government policies for reducing the carbon footprint, addressing global warming and providing sustainable 21 <sup>st</sup> century living through “transport-orientated development” and the creation of vibrant, walkable, liveable urban residential contexts.

Annotation	<i>“The planning system needs to enable and incentivise more density and diverse housing options in well located areas”</i>
Position	<b>Qualified support</b>
Comment	RHVA Inc supports a planning system that enables sustainable densification while adhering to the stated principles of the proposed changes such as diverse, well designed built form densifying urban areas in and around town centres while hosting adequate public transport networks with supporting civil and social infrastructure to sustain significant increases in population. However, caution is advised against incentivising density without proper regulation to prevent the development industry's profit-driven focus on maximizing returns for stakeholders.

Annotation	<i>“The Six Cities Region”</i>
Position	<b>Supportive</b>
Comment	<p>RHVA Inc welcomes the inclusion of ‘Illawarra-Shoalhaven City’ into the proposed policy noting good opportunities for correcting ‘poor’ planning decisions and consequently ‘ill-conceived’ outcomes of past decades while acknowledging, “urban sprawl is expensive and unsustainable.”</p> <p>Nowra and Bomaderry represent perfect opportunities for densification through in-filling, lot consolidation and amalgamation of the current CBD retail-commercial sector through developing above ground social and affordable residential dwellings. This will support the implementation of the Government’s policy of recruiting</p>

	<p>essential workers across health, education and social services from the cities to the regions.</p> <p><b>Note:</b> Case study attachment on page 6</p>
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Annotation	<i>“Dual Occupancies – well designed dual occupancies are perfectly suited to provide more housing in all low-density residential areas across the state”</i>
Position	<b>Very concerned</b>
Comment	<p>RHVA Inc views this proposed policy position as a generalist approach which fails the overall objective of delivering sustainable densification toward improved and increased housing options. Government’s stated position for “all low-density residential areas across the state” needs to be corrected and rectified by the suitable planning principles stated in the proposed policy. A ‘blanket’ application of densification through dual occupancy ‘across the state’ completely ignores individual socio-economic, socio-cultural, infrastructure, environmental and bio-diversity of distinct districts such as coastal villages within the Shoalhaven.</p> <p>This planning policy generalisation risks public support for the overall proposed planning changes evident through a perceived indolent approach toward ‘one size fits all’ which generates a public perception for lack of transparency. This policy will also elevate community concerns about exploitation by developers who prioritise Government incentives and profits over sustainable community outcomes.</p> <p>RHVA Inc is witnessing a trending ‘blanket’ approach to densification through dual occupancies throughout coastal villages in the Shoalhaven. The subsequent creation of tourist commercial precincts by stealth where developers and investors are solely focussed on holiday rentals, Airbnb and short - term accommodation dwellings in the absence of critical supporting civil and social infrastructure, negatively impacts community harmony. This approach does not deliver on Government’s objective of alleviating the state’s housing crisis.</p> <p>MMEA provides the following important comments:</p> <p>A blanket policy of allowing dual occupancy across the state is not appropriate for small, isolated, essentially holiday coastal communities that are surrounded by bushland and National Parks; areas of high biodiversity or sensitive ecosystems.</p> <ul style="list-style-type: none"> <li>• The increase in population created by dual occupancies will place unsustainable pressure on natural ecological resources relied upon for the survival of threatened and migratory species. A higher human population encroaches on wildlife feeding and breeding grounds, increases the pressure on sandflats and ICOLLs* and exposes wildlife and sensitive plant communities to dangers and disturbances from domestic pets.</li> </ul>

	<ul style="list-style-type: none"> <li>Existing population pressures caused by the peak holiday season will potentially double. Already in peak season, incidents of wildlife road deaths rise, including those animals living in National Parks, through which the increased traffic passes.</li> </ul> <p>These communities are characterised by low density housing surrounded by tracts of bushland (including endangered ecological communities). Unfenced gardens, particularly native planted gardens, provide contiguous access for wildlife as they travel between bushland habitats. Larger footprint homes reduce the amount of native flora in gardens, placing greater demand on already depleted environmental resources such as food and habitat.</p> <p>Increasing the footprint of homes on blocks of land will increase paved areas that reduce groundwater infiltration and promote flooding. It also removes or prevents the planting of shade trees and increases ambient temperature, requiring more energy to keep homes cool.</p> <p>Reducing the required number of car spaces will lead to parking on roads and verges, further impeding and threatening wildlife such as kangaroos, wombats, echidnas, reptiles and ground dwelling birds that regularly cross urban areas to reach bushland.</p> <p>The stated purpose of dual occupancy is to increase housing density in current low -density areas where housing is in high demand.</p> <ul style="list-style-type: none"> <li>Latest census information showed that in the Red Head Villages, over 60% of houses were unoccupied. There is little unmet demand for housing in many isolated coastal communities. It is more likely that dual occupancies will be used to build outsized AirBnB properties.</li> </ul> <p>* ICOLLS - intermittently closed and open lakes and lagoons</p>
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<b>Annotation</b>	<i>“Non-Refusal Standards; To facilitate these developments the NSW Government proposes to set standards for non-refusal that will apply wherever residential flat buildings or shop top housing are permitted.”</i>
<b>Position</b>	<b>Concerned</b>
<b>Comment</b>	<p>RHVA Inc notes the Government’s proposed policy outcome prioritising urgency, however seeks assurance that a ‘blanket’ policy approach toward ‘non-refusal standards’ reflects an open and transparent process for determining appropriate and inappropriate development opportunities.</p> <p>Government embarking on a mandated densification approvals regime needs reminding of its own documented policy principles instructed by densification in established town centres, with appropriate public transport options and adequate civil and social infrastructure. Failing these standards risks losing public trust and</p>

	subsequent community unrest, which may result in potential private capital investment walking away!
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Annotation	<i>“Car Parking; Reduction in car parking rates for terraces and manor houses, in target precincts which have walkable access to most needs and alternative transport options”</i>
Position	<b>Concerned</b>
Comment	<p>RHVA Inc supports the proposed policy position for sustainable densification in existing urban areas characteristic of adequate and suitable civil and social infrastructure, based on ‘transport-oriented development.’ However, we caution ‘policy makers’ on their stated densification through dual occupancies across all low-density areas of the state where significant diversity exists in relation to existing civil and social infrastructure.</p> <p>A reduction in car parking rates for dual occupancies in approved low-density areas in the absence of supporting infrastructure such as curb and gutters, storm water management, formed nature strips and driveways jeopardises appropriate and acceptable vehicle parking protocols and consequently negatively impacts community harmony.</p>

Annotation	<i>“Subdivision; It is proposed to permit the Torrens subdivision of dual occupancies provided the proposed lots meet appropriate size, width and access requirements”</i>
Position	<b>Very concerned</b>
Comment	<p>RHVA Inc notes Appendix A – Summary of Proposed Reforms, which lists dual occupancy non-refusal standards in Greater Sydney. However, subdivision of MDH (Terraces) and Dual Occupancies approved under the proposed low-rise housing reforms to meet appropriate size, width and access requirements, is not supported under a ‘blanket’ and mandated planning approvals regime across the state.</p> <p>As stated in our advice to Government regarding proposed reduction to car parking, RHVA Inc cautions the proposed ‘blanket’ approach to subdivision approvals for MDH and dual occupancies in low-density areas in the absence of adequate and sustainable supporting civil and social infrastructure including water, sewage, storm water, appropriate street scapes, community services and public transport.</p>

## Attachment

### “Six Cities Region” Shoalhaven City - Case Study

#### Introduction

*“The planning system needs to enable and incentivise more density and diverse housing options in well located areas.”*

The Nowra – Bomaderry district of the Shoalhaven City Council (SCC) municipality presents great opportunities for developing a regional model responding to the national housing crisis comprising fundamental supporting civil and social infrastructure. Nowra’s public transport network aligns buses with the railway from Bomaderry to Wollongong and Sydney alongside the recently up-graded Princes Highway providing a critical integrated transport system supporting urban densification.

The Nowra CBD, characteristic of outdated town planning decisions currently comprises a significant precinct of previous single-storey residential dwellings converted into retail-commercial premises hosting a plethora of allied health providers. This allied health precinct supporting a significant regional population cohort, including many seniors is interwoven with open, bitumen-based car parks in addition to monopolising the majority of street level parking consequently characteristic of urban traffic congestion and an over-heated environment.

The primary nature of such retail-commercial precincts in a ‘post-modern’ era realises heightened pedestrian and motor vehicle activity during daylight business hours however becomes vacant and vulnerable open spaces at night risking vandalism, anti-social behaviour and crime.

In relation to achieving the Government’s policy outcomes for responding to the housing crisis through updating and streamlining the planning system, the following are additionally suggested:

- Unlocking private capital investment
- Increasing social and public housing stock
- Increasing availability of affordable housing
- Densifying urban town centres supporting sustainable population growth
- Attracting essential workers and families to regional Australia
- Addressing anti-social behaviour and crime
- Integrating street scapes into the built environment
- Addressing traffic congestion and parking
- Reducing heat in built environments

Government should focus on the Nowra-Bomaderry CBD’s (and the like across the state) to redevelop the town centre precincts through consolidation of lots supporting mid-rise residential development delivering:

- Street level retail commercial premises
- Above ground residential units comprising ‘pepper & salt’ social, affordable and private home units
- Underground parking
- Integrated street scapes comprising shade trees, garden beds, walkways, bicycle paths and public art

In relation to incentivising good regional planning outcomes, densifying to address the housing crisis and unlocking private capital investment Government should;

- Assign senior NSW Government Planning Officials to mentor SCC Officials
- Integrate affordable housing bonus provisions of the Housing State Environment Planning Policy into a lot consolidation strategy for maximising investment yield
- Develop a multi-agency budgetary approach aligning Government's affordable housing strategy with essential worker regional recruitment campaigns
- Regulate the current land development 'culture' focussed on tourist commercial investments (Airbnb) across multiple inappropriate coastal village sites toward maximising long term residential outcomes
- Integrate state subsidies for civil infrastructure head works with social, affordable and public housing development proposals

Reference:

NSW Government: Department of Planning and Environment  
Explanation of Intended Effect: Changes to Create Low and Mid-Rise Housing  
December 2023

