



16 December 2020

Ms Sarah Lees  
Director Southern Region  
Department of Planning, Infrastructure and Environment

Via email

Dear Ms Lees,

**Re: Draft Illawarra Shoalhaven Regional Plan and Draft SIC**

Thank you for the opportunity to provide a submission on the Draft Illawarra Shoalhaven Regional Plan 2041 and the Draft Special Infrastructure Contributions (SIC) scheme for the Illawarra Shoalhaven.

The Illawarra Shoalhaven Region plays an important role in the provision of social housing, with almost 10,000 LAHC owned social housing dwellings located within the LGAs of Wollongong, Shellharbour, Kiama and Shoalhaven.

There are some concentrations of social housing, both in recognised housing estates and smaller pockets, located across the region from Ulladulla and East Nowra in the south to Helensburgh and Bellambi in the north. The table below provides a breakdown of social housing by LGA:

LGA	Total Dwellings	Social Housing	% of overall
Wollongong	80,288	6,655	8.00%
Shellharbour	26,424	1,778	6.70%
Kiama	3,943	67	1.70%
Shoalhaven	54,388	1,385	2.55%
<b>Total</b>	<b>165,043</b>	<b>9,885</b>	<b>5.99%</b>

The median age of social housing tenants residing in LAHC's portfolio is significantly higher than the statistical average in the region and the LAHC dwelling portfolio also has a high proportion of older detached dwellings. This has resulted in significant unmet demand for smaller, well located housing types as well as a high maintenance burden for existing old stock.

The NSW Government's *Future Directions in Social Housing Strategy* was released in 2016. Under this strategy, one of the Government's key initiatives was for LAHC to grow and renew the social housing portfolio. The delivery of new and replacement social housing, better integrated social housing, affordable housing and private housing is primarily achieved by LAHC through the renewal of existing assets (ie. leveraging land value).

Preferably, this will result in the development of new mixed tenure communities where social housing is seamlessly integrated with private and affordable housing and is largely indistinguishable from the surrounding housing.

### **Draft Illawarra Shoalhaven Regional Plan**

LAHC is supportive of the Draft Plan's approach to providing for the communities housing needs in the Region, particularly Objective 19: *Deliver housing that is more diverse and affordable.*

- *Strategy 19.1 Provide a diversity of housing choices and dwelling sizes in particular, is relevant to the issues being faced by LAHC in managing demand for social housing within its existing portfolio*

Likewise, LAHC is supportive of the following Strategies to achieve this objective:

- *Strategy 19.2 Investigate affordable housing targets in consultation with the Illawarra Shoalhaven Affordable Housing Roundtable, and*
- *Strategy 19.3 Assess the potential to renew social housing sites to deliver an increase in social housing stock and greater vibrancy in local communities. Lead: DPIE (Land & Housing Corp)*

LAHC is committed to working with Wollongong, Shellharbour, Kiama and Shoalhaven Councils to identify opportunities to facilitate renewal of social housing within LAHC's existing landholdings and to continue looking for opportunities that may arise beyond its existing landownership. To reflect this commitment, we recommend a more focused wording be applied to Strategy 19.3:

*Work with the NSW Government to allow for retention, adaption and improvement of existing social housing stock in a more integrated and tenure blind approach, and to facilitate the development of new mixed tenure housing stock, including through:*

- Building on existing working arrangements with Councils to support renewal of the LAHC social house portfolio*
- Support the progression of individual place making and mixed tenure social housing renewal projects, and*
- Investigate potential for site specific planning proposals to support the renewal of social housing of varying scales respectful of the existing local character.*
- Working with Community Housing Providers to build capacity to redevelop and manage social housing in the Region.*

*In particular Council and LAHC to investigate potential for renewal of social housing through:*

- Ensuring flexible allowable residential uses in the R2 zones in Wollongong, Shellharbour, Kiama and Nowra LGAs to enable well-located, diverse and mixed tenure communities of affordable and market housing to be developed and maintained;*
- Progression of a new masterplan and planning frameworks to support the renewal of social housing estates in areas such as East Nowra, Barrack Heights, Gwynneville, Bellambi, Woonona and Mangerton in the short to medium term.*
- Working with the Nowra Riverfront Advisory Taskforce to drive the renewal of the riverfront, including the potential renewal of social housing in the area.*

It is also requested that the above sites are highlighted in the Regional Plan mapping. I note there are already established working arrangements for some of these areas and we will be continuing ongoing discussions regarding the appropriate planning outcome for these sites.

**Draft Special Infrastructure Contributions (SIC) scheme for the Illawarra Shoalhaven**

LAHC has reviewed the proposed State infrastructure funding arrangements and notes that under the proposal, public housing, seniors housing or affordable housing carried out by or on behalf of a social housing provider will not be subject to a SIC.

LAHC request that in recognition of LAHC's off-budget funding model, the definition be expanded to include all development on land owned by LAHC should not be liable for a SIC. This is consistent with the approach taken by the *Affordable Rental Housing SEPP* where any residential development on LAHC land is described as for the purpose of Affordable Housing.

Thank you again for the opportunity to provide comment and we look forward to the local Council's continued support for social and affordable housing.

Should you wish to discuss the matters raised in this letter, please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Craig Smith', with a stylized flourish at the end.

**Craig Smith**  
**Program Director, South West Sydney and Southern NSW**  
**Land and Housing Corporation**