

Wednesday, 2 December 2020

Carey McIntyre
The Chief Executive Officer
Shellharbour City Council
Locked Bag 155
SHELLHARBOUR CITY CENTRE NSW 2529

via email council@shellharbour.nsw.gov.au

Shellharbour Business Centres and Surrounding Residential Lands Study

Dear Mr McIntyre,

The Urban Development Institute of Australia NSW (UDIA) is the leading industry body representing the interests of the urban development sector and has over 500 member companies in NSW. UDIA advocates for the creation of liveable, affordable and connected smart cities.

UDIA is pleased for the opportunity to make a submission on the *Shellharbour Business Centres and Surrounding Residential Lands Study 2020* (the Study) prepared by Shellharbour City Council.

UDIA is a strong advocate for housing growth in the Shellharbour City Local Government Area (LGA), which is a key growth area in the Illawarra Shoalhaven region. UDIA recognises that the LGA's population of 72,000 is expected to increase rapidly to 95,000 by 2041 or 25%.

We commend Council's vision to plan for positive population growth over the next 10-20 years and industry welcomes the opportunity to invest in an area with high amenity and liveability.

UDIA supports Council's focus to introduce a wide spectrum of new planning provisions to provide housing diversity at key town centres. UDIA also supports Council in their attempt to revitalise struggling town centres.

UDIA makes the following recommendations are enacted by Council to realise the Study outcomes and better respond to socio-economic change in the Shellharbour City LGA:

1. Opportunities for densification of select low density residential zones near Town Centres

UDIA understands that the Study largely aims to achieve greater housing diversity at the nominated town centres in the Shellharbour City LGA and ensure that they remain vibrant and continue to contribute to the local economy. Council will achieve this by amending existing planning provisions at each of the nominated town centres.

UDIA advises that multi-unit housing will continue to be developed in the low-density residential zones due to the small land area that the Study focusses on in the LGA. UDIA NSW suggests that to further support the Study objectives, Council should investigate an option to up-zone suitably located areas of R2 zoned residential land that are near the nominated town centres.

This strategy could still achieve the Study objectives, especially if a town centre, with new planning provisions, does not redevelop in the short term. UDIA is aware that Council amended the planning

provisions (height, FSR etc) to stimulate redevelopment in the Albion Park Town Centre. However little redevelopment has occurred, as the parking requirements proved onerous on existing town centre sites.

A review of relevant planning controls is recommended to achieve redevelopment of the nominated centres. Other measures raised at the Agency Workshop (May 2020), such as a review of provisions covering parking and open space and apartment design and sizes, could also incentivise developers to provide multi-unit housing at the nominated town centres.

UDIA supports a diversified strategy with several planning options to allow Council to achieve the Study objectives and better respond to socio-economic change.

Recommendation 1. Council to investigate further up-zoning of low-density residential land near the nominated Town Centres to provide increased opportunity for multi-unit housing and further achieve the Study objectives.

Recommendation 2. Council to review planning provisions covering parking and open space and apartment design and sizes to further promote multi-unit housing in the nominated town centres in the Shellharbour City LGA.

2. Develop a civil works program to support the town centres

UDIA supports efforts by Council to strengthen the commercial viability of the LGA's town centres through an ongoing program of amenity improvements to improve the public domain appearance of the nominated town centres in the Shellharbour City LGA.

Town centres with an enhanced public domain will provide an attractive alternative for residents living in the low-density areas of the LGA. A town centre with an improved public domain will also enhance its commercial viability and help with the creation of place.

An ongoing civil works program should be delivered as redevelopment occurs at each of the town centres and not be subject to further consideration by Council (Refer *Table 8 – SBCSRLS Recommendations*).

A supporting civil works program, similar to what is being undertaken as part of the Warilla Town Centre project, would send a strong message to the community and development industry that Council is committed both to town centre revitalisation and providing multi-unit housing in response to socio-economic change.

Recommendation 3. Council to implement an integrated civil works program to support the redevelopment of all nominated town centres in the Shellharbour City LGA.

3. Develop a transport and access plan to support all Shellharbour town centres

Further to Recommendation No.1, improved access to the proposed town centres is critical to incentivise their redevelopment and provide increased livability for future residents. It is acknowledged that Council is targeting improved access at some centres, but this strategy should be expanded to other nominated town centres, with an overall objective to improve access in the LGA. This approach will align with the *Shellharbour Local Strategic Planning Statement* which aims to:

“provide accessible and connected suburbs with a range of transport options”

It is also consistent with the *Draft Illawarra Shoalhaven Regional Plan 2041*, which aims to:

“integrate transport and land use planning, and support improvements in active transport (walking and cycling), public transport and transport infrastructure....”

Council should not “consider” but rather enact a transport study for the Shellharbour City Centre and review the transport and parking provisions for Albion Park, Shellharbour Village, Oak Flats and Warilla.

UDIA notes that there is concern with current parking provisions and need to better match parking space requirements with dwelling type (1-space / 1-bedroom dwelling requirement) on top of the parking requirement for commercial and retail premises and neighbourhood shops (1 space / 35m² – 40m² gross floor area).

These controls can impact on the redevelopment of the nominated town centres in the LGA, which occurred at Albion Park. A possible option could be specifying no minimum car park requirement for a mixed-use development as an incentive to promote redevelopment and realise a better design outcome.

Recommendation 4. Council to develop and undertake a transport study to support improved access to each of the nominated town centres in the Shellharbour City LGA.

Conclusion

UDIA is confident that the Study will be successful provided further work is completed as outlined in the recommendations above and specifically as follows:

- Council to investigate further up-zoning of low-density residential land near the nominated Town Centres to provide increased opportunity for multi-unit housing and further achieve the Study objectives;
- Review of planning provisions covering parking and open space and apartment design and sizes to further promote multi-unit housing in the nominated town centres;
- Council to implement an integrated civil works program to support the redevelopment of all nominated town centres; and
- Development of a transport access plan for each town centre that improves their accessibility to the broader Shellharbour City LGA.

We believe that the Shellharbour City LGA will contribute significantly to the Illawarra Shoalhaven region with increased opportunities for multi-unit housing at key town centres, which are well connected and have a good public domain. These factors will ensure that Council responds to socio-economic change to provide housing choice at key locations with high amenity and liveability.

To further support housing growth in the Shellharbour City LGA and the broader Illawarra Shoalhaven region, we request that our recommendations are implemented by Council.

Please contact Mr Kit Hale on 02 9262 1214 or khale@udiansw.com.au to arrange a meeting to discuss any further matter related to the Shellharbour Draft Housing Strategy.

Yours sincerely,



Steve Mann
Chief Executive
UDIA NSW