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27 September 2020

Mr Dominic Johnson
(Attention: Urban Planning)
General Manager
Mosman Council
PO Box 211
SPIT JUNCTION NSW 2088

Email – council@mosman.nsw.gov.au

Dear Mr Johnson

Mosman Draft Local Housing Strategy

The Property Council welcomes the opportunity to provide Mosman Council with comments on its draft Local Housing Strategy (the draft Strategy).

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes. We are pleased to provide the following comments for your consideration.

General Comments

We acknowledge that Mosman Council has prepared this draft Strategy as a requirement of both the Greater Sydney Regional Plan (Action 3) and the North District Plan (Action 17). We support the Council undertaking this work at this time ahead of its deadline to update its local environmental plan to align with the North District Plan.

In 2018, the Department of Planning, Industry and Environment (DPIE) issued the publication "Local Housing Strategy Guideline" to all local councils that provided a step by step process for councils developing local housing strategies. We note that Council has prepared its draft Local Housing Strategy to be consistent with the Department's guideline.

Housing Targets

The Property Council and our members have taken the opportunity to review many draft Local Housing Strategies that have been released for consultation. We applaud Council's efforts to undertake the strategic planning work required to deliver more housing diversity, especially for seniors and smaller households, and strategies to improve housing affordability.

Together the draft Local Housing Strategy and Council's Local Strategic Planning Statement (LSPS) should identify how medium and long-term housing targets will be achieved. It is understood the Greater Sydney Commission identified a 6 to 10-year housing target (for the period between 2021/22 and 2025/26) of between 250 and 300 additional dwellings during the LSPS assurance process. We support Council accepting this role to identify its own target within this range based on local supply factors.

Council's draft Strategy indicates:

- 713 additional dwellings are needed by 2041;
- data released by DPIE indicates an "implied dwellings" need for 1,358 dwellings;
- a reasonable 6-10 year housing target would be similar to the current 0 to 5-year target;
- previous work has found unused land capacity in the R3 Medium Density Residential zone exists; and
- an opportunity for new dwellings existing in the Spit Junction local centre, Mosman Civic Centre site and Business zones along Spit Road and Military Road.

We support Council undertaking further work to implement this Strategy once it has been endorsed by DPIE. In particular, careful consideration should be given to providing a supply of suitable dwellings that meet the needs of seniors, singles, couples and for other demographic groups identified in the Strategy with unmet housing needs.

Themes & Actions

Detailed comments, responding to each of the actions identified by Council in section 4 of the draft Local Housing Strategy, are provided in the attached table.

Should you have any questions concerning the content of this submission, please contact Troy Loveday, NSW Policy Manager, on 0414 265152 or tloveday@propertycouncil.com.au

Yours sincerely



Belinda Ngo
Acting NSW Executive Director
Property Council of Australia

Theme and Actions	Response
<p><u>Housing Supply</u></p> <ol style="list-style-type: none"> 1. Maintain land use zoning and development standards (for lot size, height of buildings and floor space ratio) 2. Monitor housing supply in Mosman to ensure that anticipated demand is met. 3. Consider the contribution of non-standard types of housing, such as granny flats, aged care facilities and nursing homes, to housing supply in Mosman. 	<p>We would encourage Council to review the current development standards applying to land suitable for renewal (eg R3, B2 and B6) to ensure that they are appropriate and not acting as obstacles to the redevelopment of any land capable of contributing to new housing supply.</p> <p>We support Council monitoring housing supply data to fully understand local supply and demand issues. We support Council expanding this to include other non-standard types of housing such as granny flats and seniors housing.</p>
<p><u>Housing Diversity</u></p> <ol style="list-style-type: none"> 4. Maintain the diverse range of housing types permissible in zone land use tables within Mosman LEP 2012. 	<p>We support Council maintaining a range of diverse housing types in its LEP and note that the recent exhibition of a EIE for a housing diversity SEPP seeks to provide opportunities for more housing diversity, including Build to Rent housing, student housing and co-living.</p>
<p><u>Housing for older residents</u></p> <ol style="list-style-type: none"> 5. Maintain the range of permissible housing types within Mosman LEP 2012 to provide choice and facilitate downsizing. 6. Review planning controls in Mosman's DCPs for adaptable housing and universal design to ensure best practice to meet the housing needs of older residents and facilitate ageing in place. 7. Consider options to facilitate the uptake of adaptable design in new and existing housing stock for multiple and single dwellings. 	<p>We support Actions 5 to 7 which are relevant to housing for older residents. Council needs to look beyond the LEP provisions for these types of housing and also consider other factors such as DCP requirements that may prevent these types of housing being delivered.</p> <p>We generally support the adoption of appropriate adaptable housing and universal design where they do not impose excessive requirements on new development beyond what would be reasonable for the type of development being proposed.</p>

<p><u>Housing design and character</u></p> <p>8. Consider planning controls within Mosman LEP 2012 and DCPs to ensure high quality design and construction that responds to local conditions and reflects community values.</p> <p>9. Consider the approaches for integrating local character into land use planning outlined in the NSW Government's <i>Local Character and Place Guideline</i> (February 2019).</p>	<p>We generally support steps being taken to introduce design excellence and local character provisions into Council LEP and DCP controls. These must be appropriate for the scale of development involved and not introduce excessive design standards that are beyond what is reasonable for the type of development being proposed.</p>
<p><u>Housing affordability</u></p> <p>10. Collaborate with key stakeholders on options to respond to the cost of housing in Mosman.</p> <p>11. Collaborate with North District councils to support affordable housing within the District, and with the NSW Government for a district and/or regional-wide approach.</p> <p>12. Support the retention of existing social housing in Mosman to ensure social mix and diversity.</p>	<p>We support Council undertaking measures that would encourage the development of and/or maintain current supply of affordable housing within the Mosman LGA, particularly diverse housing suitable for demographic groups experiencing unmet housing needs.</p>