



**Property Council of Australia** ABN 13 00847 4422  
**A** Level 7, 50 Carrington Street, Sydney NSW 2000  
**T** +61 2 9033 1900  
**E** [info@propertycouncil.com.au](mailto:info@propertycouncil.com.au)  
**W** [propertycouncil.com.au](http://propertycouncil.com.au)  
**🐦** [@propertycouncil](https://twitter.com/propertycouncil)

8 July 2024

Mr David Green  
Land Use Planning Manager  
Wollongong City Council

Via email: [records@wollongong.nsw.gov.au](mailto:records@wollongong.nsw.gov.au)

Dear Mr Green,

The Property Council of Australia welcomes the opportunity to provide feedback on the *Draft Affordable Housing Policy* (Policy) which has been released for public comment by Wollongong City Council (Council).

Property Council is Australia's leading peak advocacy body with over 2,300 member companies. We are the voice of the Australian property industry, championing a strong, thriving sector that leaves a positive legacy for all Australians.

Property Council Members in the Illawarra Shoalhaven operate across the property industry in fields such as design, planning, engineering, and legal professions, also encompassing owners and operators of key industrial, commercial, retail and residential companies. Through our work, we are the voice for the property industry and are acutely aware of the challenges facing local councils on the need to balance growth for a changing and diverse population, as well as providing services and lifestyle benefits offered within a regional area.

Overall, we support Council's commitment to Affordable Housing and the development of a policy to support the delivery of affordable housing across the LGA. We support the initiatives in principle as outlined in the policy and provide these comments relating to the policy below.

We support the waiving of application fees and exempt development contribution fees to incentivise the delivery of Affordable Housing in the LGA and encourage Council to continue exploring other initiatives for the delivery of this type of housing. We note that there are no additional incentives or offsets included in the policy other than just a requirement to increase the proportion of the current FSR to be allocated to affordable housing. We are concerned that this may erode feasibility and has the potential to stall development and encourage Council to test feasibility with developers prior to the policy being rolled out to ensure it can be achieved.

We note that the mandatory inclusion of affordable housing for developments greater than 20 dwellings may be a new concept for industry amidst a range of other affordable housing incentives also introduced by the NSW Government. We support the gradual introduction of this initiative, however, note that the policy does not stipulate how long the stock must be kept

affordable, how they will be monitored for compliance with the Affordable Housing Guidelines and what the probity is around DA applications for this type of development.

We encourage Council to collaborate with industry and CHPs to 'sense check' the policy prior to it being rolled out and during the roll out period to refine and adapt strategies over time to improve outcomes. The items of discussion could include:

- Finer details on the implementation of the policy and probity
- Clarification on the calculation of the monetary contribution
- How funds will be dispersed and the use of any funds for affordable housing
- Challenges with the roll out of the policy and feasibility barriers
- What other levers might be enabled to support the delivery of affordable housing
- CHPs involvement in the developments and management of affordable housing.

We also recommend Council carry out an audit of its owned land to identify any other opportunities for future affordable housing utilisation, as well as assisting State agencies in the roll out of housing on their land.

### **Conclusion**

We appreciate the opportunity to comment on this Strategy and encourage Council to continue engaging with industry on the implementation of this policy.

If you have any questions related to the matters raised in this letter, please feel free to contact me at [mguido@propertycouncil.com.au](mailto:mguido@propertycouncil.com.au) or on 0437 315 198.

Yours sincerely,



**Michelle Guido**

Regional Director - Illawarra  
Property Council of Australia