

Mr Mark Arnold  
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Via email: [projectsupport@byron.nsw.gov.au](mailto:projectsupport@byron.nsw.gov.au)  
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Dear Mr Arnold

### **Byron Shire Council Housing Options Paper**

Thank you for the opportunity to review Council's Housing Options Paper which is requesting feedback on future housing options for residential localities across the Byron Shire local government area (LGA) to assist with a refresh of Council's Residential Strategy.

I understand the purpose of the Housing Options Paper is to document what changes have impacted housing availability and affordability in the Byron Shire LGA since 2020, and to look at ways Council can deliver housing which meets the needs of its community.

I commend Council on revisiting its strategic approach to deliver housing and strongly encourage it to pursue options within the existing planning framework which will help increase housing supply and ensure it fulfills its commitments made to the Minister for Planning on 15 August 2023.

The Residential Strategy is an essential document for addressing the future housing needs of the Byron Shire LGA and setting a clear plan to deliver the 4,522 new houses required to meet forecast demand to 2041. Identifying a mix of infill and greenfield areas within the Residential Strategy will be vital to support growth and create a diversity of housing choices.

To assist Council with a refresh and finalisation of the Residential Strategy, the Department provides the following comments in relation to the Housing Options Paper:

1. Council should ensure the Residential Strategy is consistent with all relevant state environmental planning policies, section 9.1 Ministerial Directions and the North Coast Regional Plan 2041. Inconsistencies will need to be detailed and justified when the Residential Strategy is submitted for the Department's approval.
2. Given the scale of the housing crisis facing the region, Council should adopt and incorporate options into the residential Strategy which will increase housing supply and diversity that help support community needs, including the needs of an ageing population, the ongoing reduction in household size and the delivery of social and affordable housing.
3. Council should ensure the Residential Strategy plans for increased density within the existing urban growth boundary and identifies suitable locations for greater density and how it will be delivered. In accordance with the North Coast Regional Plan 2041 housing strategies must prioritise new infill development to assist in meeting the region's overall 40% multi dwelling / small lot housing target.

4. Investigation Areas located outside the urban growth boundary must be assessed against the Settlement Planning Guidelines and Urban Growth Area Variation Principles contained in the North Coast Regional Plan 2041 and confirmed not to be affected by natural hazards. Demonstrating that substantial movement has been made toward achieving the region's infill target within the existing growth area boundary will also be critical to Council establishing the merit of greenfield development on important farmland.
5. Council should ensure the Residential Strategy plans to maximise density in the Investigation Areas to encourage the efficient use of the land and infrastructure and help deliver new and diverse housing.
6. In accordance with its commitment to the Minister, Council will need to establish a housing monitoring program as part of the Residential Strategy.
7. Consultation with the relevant State agencies is recommended prior to finalising the Residential Strategy to confirm the suitability of the Investigation Areas. The Department's Northern Region team would be pleased to help facilitate this consultation.
8. It is recommended the outcomes of Council's infrastructure staging and sequencing plan are incorporated into the Residential Strategy to ensure the orderly and economic development of infill and new greenfield land. A clear table of actions and sequencing of investigation areas to assist in managing and prioritising projected residential growth should also be included.
9. It would be beneficial for Council to identify the key infrastructure works required to service the projected housing growth to ensure alignment of land use planning with infrastructure provision in the Residential Strategy. It would also be beneficial to identify that further infrastructure servicing strategies will be needed to support future planning proposals.
10. Aspirational dwelling projections may be adopted by Council when planning for growth, but it is important the trigger points for strategy actions and deliverables are based on actual growth.
11. Council should ensure the matters identified by the Peer Review (November 2021) undertaken by Locale Consulting are addressed in the Residential Strategy. These matters relate to staging and sequencing of investigation areas, monitoring and review and actions and timing.
12. The narrative around managing non-hosted short-term rental accommodation (STRA) should clearly identify it is only one part of addressing housing supply and rental affordability issues in the Byron Shire LGA and recognise the new rules commencing on 23 September 2024 will help encourage a shift from non-hosted STRA to long-term rental.
13. Council is encouraged to consider whether certain forms of tourist and visitor accommodation e.g. hotel and motel accommodation and serviced apartments would be appropriate in some residential areas to support tourism.
14. Council should consider planning for caravan parks and manufactured home estates as part of the Residential Strategy as they contribute to the diversity of housing within the Byron Shire LGA.
15. Any proposed work / live sites not within a MU1 Mixed Use Zone must ensure that their primary purpose remains for employment. Any associated proposed local planning provisions will also need to be confirmed to be legally appropriate.
16. The origin of any figures used as part of the evidence base for the Residential Strategy should be identified.

I note that Council has committed to adopt and submit the Residential Strategy for the Department's approval by March 2024. I reaffirm the importance of Council delivering to its commitments and the milestones nominated to the Minister to enable increased housing supply.

The Northern Region team is available to work through these comments with Council and look forward to working together to deliver strategic-led planning outcomes for the community.

Should you have any questions, I have arranged for Ms Gina Davis to assist you. Ms Davis can be contacted on 5778 1487 or email [gina.davis@planning.nsw.gov.au](mailto:gina.davis@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Gray', written over a light gray rectangular background.

2/11/2023

**Jeremy Gray**  
**Director, Northern Region**  
**Local and Regional Planning**