

Feedback on Affordable Housing Contribution Scheme and Planning Proposal



Submission date: 3 July 2022, 3:22PM

Receipt number: 5

Related form version: 1

Name Jenny Bird

Email

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My feedback is specific to the Bangalow Areas of Investigation as per the Bangalow Map. The Map shows two areas in yellow - land on both sides of Ballina Road and land on both sides of Rankin Drive, all according to the Residential Strategy approved by Council in 2020.

Whilst I absolutely support all reasonable efforts to grow affordable housing in the Shire, I have concerns about impacts and argue strongly that infrastructure improvements **MUST** be completed prior to development. The scheme will inevitably increase both population and density and we know that traffic and parking are two of the worst side effects.

1. Traffic and parking

Bagalow is already heavily impacted by traffic - cut in half as it is by Lismore Road and Granuaille Road, impacted by noise and pollution from the M1, and as a service village absorbing population and tourist growth both within the village and in the surrounding hinterland. Since the Movement Strategy of 2019 (which found that parking supply was meeting demand), demand now outstrips supply, despite the

clear success of changing the main street from 2 to 1 hour parking.

Movement is one of the key themes in the Bangalow Village Plan, and we spend an inordinate amount of time trying to implement our vision for a village connected by safe off road shared paths, with the rail corridor as the spine. Whilst we can't do anything about the enormous volume of through traffic Bangalow suffers, we can do something to reduce car movements by residents and visitors.

The following projects need to be completed prior to any development under this scheme in Bangalow:

* The Rail Corridor Shared Path Project needs to be extended east from the A&I Hall path to link with the Rankin Drive area. These new residents need to be able to access the village centre via this path to reduce traffic. Rankin Drive has already seen a significant amount of infill development. Rankin Drive and Leslie Street have, over the last few years, become busy streets with high and speeding traffic volume. A development of the size suggested in this Scheme will add untold traffic volume to these residential streets. I live on Leslie Street and can attest to the volume and speed of traffic heading up and back from Rankin Drive now.

* The Byron Street shared path from Station Lane across Snows Bridge to the sports fields must be completed

* A new walk/cycle path down Ballina Rd must be completed with an improved pedestrian crossing at Feros Village across to the new Byron Street path.

2. Koalas

Sections of the Rankin Drive area are koala corridors. This requires a full assessment and necessary accommodations made to the design of the development.

3. Heritage

In Ballina Road there are a number of significant heritage houses and gardens that deserve protecting. Whilst Ballina Road is not in the existing Bangalow Heritage Conservation Area these houses are part of the rural heritage of Bangalow, forming part of the original housing stock of the village, and record the farms closest to the village. There may be a case, given that this Scheme will effectively enlarge the footprint of the village, to expand the boundaries of the Bangalow Heritage Conservation Area to include Ballina Road.

4. Design for population groups

The new Census data needs to be analysed closely. In the 2016 Census the greatest unmet need for medium density/small housing was for our ageing population, who are forced to leave Bangalow. Given the statistics for older women and homelessness this is particularly pertinent. Council needs to consider residential models that are designed to provide accessible appropriate housing for our ageing population. Similarly we need residential models that suit young people and single parent families.

Thank you

Jenny

Upload your feedback

INSTANT STEEL PTY LTD

27 June 2022

Byron Shire Council
PO Box 219
MULLUMBIMBY NSW 2482

Delivered via email: nhancock@byron.nsw.gov.au
Cc: acaras@byron.nsw.gov.au

Attention: Ms Natalie Hancock

RE: Submission to Affordable Housing Contribution Scheme on Exhibition

Please accept this letter as my submission to the Affordable Housing Contribution Scheme (AHCS) as currently on planning exhibition.

As a Bangalow landowner of property Lot 11 DP 807867 and Lot 261 DP 1262316 at Rankin Drive, I make this submission in the understanding that many people do not fully understand the significant time and cost issues that need to be addressed when looking to bring un-serviced lands to become suitable for residential sale.

A prime example is that of dealing with the many Council policy documents and interpretations of such by Council officers and how that impacts upon significant increase in development costs and time delays. It would seem to me that Council officers have a view that 'development costs' are not of their making and somehow are removed from the implications of their decisions. My most recent example rests with an application made to Council seeking to make compensatory plantings such that I could remove (1) eucalypt tree in accordance with Council policies. This tree removal would enable the earthworks necessary such that the new public road could be built to a gradient of 18% - as Council's engineers would not accept steeper slopes despite local roads in the area being steeper than this. This denying of compensatory plantings and to have 18% road gradient requires the new road to be located over a Rous watermain. The general public would not know what this means I think, but if they were to engage an engineer, prepare concept designs and then meet with Rous Council, document Council requirements, you find six months later, that it will cost between \$300k to \$500k to move the watermain clear of the earthworks - it then places a definitive value upon Council officers 'merit' decision.

It is raised with Council that the pro-rata development costs identified within the AHCS are markedly lower than real costs to be incurred. Such additional costs at Rankin Drive include re-routing Rous water main (in excess of \$300k and am currently awaiting formal quotes and could be as high as \$500k), a new

sewer pump station (circa \$250k), retaining wall provisions (circa \$150k), external footpaths, stormwater WSUD and GPT costs and vegetation management works. These costs are significant and easily double the ultimate cost allocation identified within the AHCS proposal. Secondly, the AHCS has identified a likely yield of 13 lots per Ha over the lands (ie approx 500m²/lot). I have undertaken concept designs and when allowance for stormwater management reserves, re-vegetation buffers, sewer pump stations, bushfire buffers, some areas of steep slopes and constraints due to Rous water easements, I have an average allotment yield area of approx 1500m²/lot.

I do not object to an AHCS in principle, but do not support the rationale of landowners having to hand over 20% of the upzoned land. This is unjust, and additionally do not agree to a "one size fits all" percentage policy, as some future developments may not need to provide any new road, sewer works, electrical etc

In summary, the development scenario applicable to the property at Lot 11 DP 807867 and Lot 261 DP 1262316 is that costings are at least 200% more than that as exhibited and the yield will be only 33% of that as proposed by the AHCS. On this basis, I object to Council levying my lands for any more than 4% contribution of upzoned land.

Should you have any questions as to the above, please don't hesitate to contact me to clarify items raised.

Yours sincerely

Max Campbell - Director
INSTANT STEEL PTY LTD

RAY DARNEY TOWN PLANNING

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28th June, 2022

The General Manager
Byron Shire Council
PO Box 19
Mullumbimby NSW 2482

Email; council@byron.nsw.gov.au

Subject: Exhibition of Affordable Housing Contributions Scheme

Attention : Alex Caras
Natalie Hancock

As you are aware I have represented two landowners over a number of years who have endeavoured to move forward with proposals for affordable housing.

I personally have been a supporter of trying to gain support from Council, from the Community and from the State Government Department of Planning for more housing and more affordable housing in Byron Shire.

Briefly I want to touch on three (3) issues that make the current Planning proposal (Department Ref: PP-2021-7395) difficult:

- Not all sites listed in the Planning Proposal have the same constraints and attributes. For example the land at 68 Rankin Drive Bangalow has infrastructure costs and alterations to infrastructure that are more expensive than other sites that are listed. Also the site at Lot 31 DP 1222032 east of Coolamon Scenic Drive Mullumbimby will require expensive drainage as will Council's Lot 22 adjacent to ensure that the sites are not flooded. It should be noted that both the above Mullumbimby sites, as well as those south of Anne Street Mullumbimby shown on Figure 5.2 will require expert hydraulic studies to ensure they can be developed.
- As proposed, the sites shown at Byron Bay, Bangalow and Mullumbimby will compete at a disadvantage with the major land releases at West Byron and Bayside Brunswick Heads. The loss of 20 % of land to affordable housing to Council as set out in the Proposal places the small landowners within the Proposal at a 20% disadvantage with the two major land releases that are already rezoned to Residential
- Council's Development Approval process is difficult for all involved in releasing land to provide for housing. For example, the West Byron lands and the Bayside Brunswick lands have been creeping along to release for the past 16 years, meanwhile all land costs for

housing have skyrocketed. We all understand that many in our community resist change, all that this resistance has led to is that Byron Shire houses the rich and the famous.

In order for for these small development sites listed in the current Planning Proposal to be developed economically , Council will either need to:

- (a) Provide for a flexible contribution based on expected development costs or
- (b) Provide for a much lower contribution than 20% as now proposed.

Yours sincerely

Ray Darney

Feedback on Affordable Housing Contribution Scheme and Planning Proposal



Submission date: 16 May 2022, 9:43PM

Receipt number: 1

Related form version: 1

Name Duncan Dey

Email

Provide your feedback here

The scheme should recognise that no flood-prone land should be used for affordable housing. That's because no flood-prone land should be used for any housing. Society usually places its poorer members in the least safe locations. Let's not repeat that mistake while ticking the housing affordable box.

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Feedback on Affordable Housing Contribution Scheme and Planning Proposal



Submission date: 3 July 2022, 11:33PM

Receipt number: 6

Related form version: 1

Name Ian Holmes

Email

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Thank you the time extension slightly beyond 30 June, which allowed me to complete a review of all documentation associated with the introduction of an affordable housing contribution scheme, and for others in the community to finalise EOY financial reporting matters before moving onto AHCS feedback.

1. It is noted that the 3 Investigation Areas in Final version of the Byron Residential Strategy each include a statement regarding integration with local character, describing broad attributes applicable to each area. We are encouraged by this recognition of the importance of character in maintaining a distinctive Bangalow style.

2. The key issues and further investigations for each area accurately reflect specific community concerns. For Rankin Drive this includes Koala habitat protection, traffic flow impact onto surrounding streets, and connecting pathways to the village centre and rail corridor. The latter issue was identified by Ref Ba3, Exhibition version Residential Strategy: Working in cooperation with residents to enhance (off-road) cycleway and pedestrian connections, amenity and streetscapes infrastructure (such as footpaths, lighting and additional waterways/drainage area

crossing) to encourage walking and cycling between activity points such as sports fields, parks and the village centre and reduce car dependency - a key priority is a walk/cycleway along the railway corridor from the western to the eastern edges of the village.

3. The high heritage value of Investigation Area 12 deserves special attention because of the five listed and recorded heritage items on Ballina Rd - refer Byron Shire Heritage Study 2007. These dwellings are all the grand old homes for which Bangalow is renowned. We would therefore recommend that further assessment and verification of such heritage items be considered as a key issue requiring further investigation. This idea is consistent with Ref Item Ba6 in the Exhibition version of the Residential Strategy - to ensure that new developments build on the existing residential character and promote a sense of community.

4. The Affordable Housing Contribution Scheme, version 01 includes a comprehensive financial analysis of the benefits of the scheme. The AHCS initiative is supported by the Bangalow Progress Association and we look forward to the availability of a legislated planning framework that addresses community values while delivering genuine affordable housing.

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Feedback on Affordable Housing Contribution Scheme and Planning Proposal



Submission date: 6 June 2022, 2:25PM

Receipt number: 2

Related form version: 1

Name Angelique May-Bennett

Email

Provide your feedback here

Affordable housing should be included in every development, as a 20% incorporated plan. Putting affordable housing in one section can create segments of socioeconomic areas. Overall developments with different opportunities for different sectors should be considered.

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Feedback on Affordable Housing Contribution Scheme and Planning Proposal



Submission date: 14 June 2022, 9:31PM

Receipt number: 3

Related form version: 1

Name Chris Proctor

Email

Provide your feedback here

Dear Natalie and Steve,

Thank you for the opportunity to provide feedback on your letter on Affordable housing proposal dated 12th may 2022. The affordable housing scheme seems to lack a understanding of the economic impact that owing and maintaining land in the Byron shire has had on land owners. your main assumption here is that landowners are either not paying off mortgages on land or have not had very significant purchase prices. It appears that you have made the assumption that landowners will be able to afford to develop and give away 20% of their land to essentially to a community housing provider who has never had to purchase land, pay interest rates, council rates, land tax etc on their property over considerable time periods. I am a little shocked to see these assumptions and the lack of clarity around what would happen to any property provided to a community housing provider or further, any commitments that the community housing provider would have to be able to on sell the property at a future date. I would have assumed that the land would have remained in my ownership. I would like to understand why this would not be the case. There are further issues with water and land quality, on large

sections of my land which you have identified for affordable housing is not able to be built on and is hence not suitable for development.

I have also read your cost analysis and my honest opinion is you have overstated the sales price of blocks of land and you have underestimated the costs of development in the Bangalow area. Hence your cost estimates are fundamentally flawed. I have offered some more realistic costs for you:

Estimated cost of construction is well under what could be considered a reasonable amount. Bangalow has estimated \$87,428 per lot including contributions. This figure is considered to be in the range of \$150,000+ per lot.

The viability assessment is based on existing owners not owing any money on the properties and that they did not pay anything for it. This is considered unreasonable considering that the Bangalow properties are not new to the residential strategy and have been in the Bangalow strategy for a number of years.

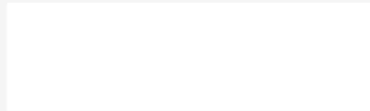
The policy is likely to result in the majority of the properties not going ahead with any rezoning due to the lack of economic viability, hence even less housing will be provided which will in turn push up housing prices worsening the affordable housing crises.

A simple 50 lot subdivision will require the dedication of 10 of the lots for affordable housing, these will require \$150k per lot to construct = \$1,500,000 plus the 10 x \$800,000 of lost sales which will result in a \$9,500,000 affordable housing contribution.

To further make this point it cost me in excess of \$180,000 to do a boundary adjustment and so I am confident your financial analysis is in need of significant adjustment.

As a final point, I would not see developing my land in Bangalow as "worthwhile" financially and believe having affordable housing would have a significant

impact on the community look and feel of Bangalow and would negatively impact the area. Housing should be consistent with its current dwelling which are typically a single home on 600 meter sq blocks. In its current form I don't believe your plan will meet your objectives. What other approaches have you come up with other than this proposal? Have you engaged the wider communities and asked them how they would feel about having townhouses and high density housing inserted into their communities? Have you done any parking and traffic impact assessments? We will look forward to your comments and responses and to see what alternative solutions you have as alternative options that will be more community focused. I would have assumed a contribution scheme of 1-2% of sales would have been more of a realistic and easier to administer. Looking forward to you feedback
Sincerely,
Chris and Rebecca Proctor



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