

23 August 2016

Director Regions – Southern  
Dept. of Planning and Environment  
PO Box 5475  
Wollongong NSW 2520

Dear Sir/Madam:

**Re: Submission to the Draft South East and Tablelands Regional Plan in relation to the site located at McCourt and Suttor Roads, Moss Vale**

## 1. Introduction

This letter has been prepared by Mecone Pty Ltd on behalf of Hamish Ross, a member of a landowner group for the site located at McCourt and Suttor Roads, Moss Vale, legally known as Lot 1, 2, and 3 DP 873240 (subject site). The subject site is located in the local government area (LGA) of Wingecarribee Shire.

The purpose of this submission is to raise potential issues related to housing supply in Wingecarribee Shire, to suggest amendments to the draft Plan, and to outline the future development potential of the subject site.

This letter is accompanied by a Vision Statement for the site that was presented to Wingecarribee Shire Council in February 2016. The Vision Statement describes the site in its context, provides an overview of relevant strategic directions, identifies challenges and opportunities for development at the site, and discusses the design concepts for the site.

## 2. Housing supply in Wingecarribee Shire

Under Action 4.1.1, the draft Plan states:

*Evidence sourced from council housing strategies shows there is enough zoned land with development potential for the market to supply housing in a range of locations in the region' (p. 63).*

Our investigations, however, have revealed that the adequacy of existing zoned land with residential development potential in Wingecarribee Shire may be less certain than this statement suggests. Without further rezonings, we anticipate that Wingecarribee Shire will struggle to achieve the DP&E's dwelling targets for the LGA. Based on projections in the Sydney-Canberra Corridor Regional Strategy 2006-2031, we have found that approximately 348 dwellings per annum (2006 to 2031) are required to meet the need for additional dwellings in Wingecarribee LGA. Assuming a continuation of the 2014-2015 dwelling approval rate, the LGA will run out of capacity by 2022. Refer to the graphs in the accompanying Vision Statement for additional detail.

## 3. Existing local housing data

Council's housing strategy contained in the Local Planning Strategy 2015-2031 was informed by the Demographic and Housing Study (2012) prepared for Wingecarribee Council by SGS Economics and Planning. The study reports that there is more than sufficient capacity to meet housing targets. Specifically, the study states that currently there is capacity for 28,956 dwellings

in the LGA. This estimate, however, was based on the 'Meshblocks' method, which, as noted by Council in its Local Planning Strategy 2015-2031, can potentially overestimate capacity.

To address this potential methodology issue, Council has performed a 'ground-truthing' of land zoned for residential development (as reported in the Local Planning Strategy 2015-2031). This ground truthing analysis found that there is potential for only 11,084 dwellings in the LGA. Despite this significant downward revision from the SGS study, Council has concluded that capacity is still sufficient for meeting DP&E's estimated dwelling demand of 7,560 dwellings to 2031.

We raise the following issues with Council's conclusion on this matter:

- First, the large majority (81%) of the identified capacity is in infill areas (i.e. existing urban areas zoned for residential purposes). The constraints to infill development should not be underestimated. We admire Council's attempt to consider these constraints in its ground-truthing exercise, but it is important to understand that there are a number of key constraints that cannot be accounted for even in a ground-truthing exercise, such as buyer preferences, economic feasibility and community resistance to development that would alter the existing character of the area.
- Second, it is important to note that dwelling capacity does not necessarily result in built dwelling houses. Wingecarribee Shire needs ample surplus residential land to provide choice and to ensure affordability. According to Council's account of dwelling capacity, the ratio of dwelling capacity to dwelling demand is less than 1.5:1. We consider this ratio inadequate for ensuring a reliable stream of housing delivery and maintaining housing affordability.

#### **4. Suggested amendments**

The draft Plan states that the NSW Government will:

*...consider amendments to relevant environmental planning instruments where they are informed by updated housing strategies (p. 63).*

In light of the uncertainties related to housing supply in Wingecarribee Shire outlined above, we suggest that the draft Plan be revised so that it does not defer completely to local strategies on the matter of housing delivery. We recommend that the draft Plan allow for the merit-based consideration of rezoning proposals in areas near existing job markets and public transport infrastructure, such as the subject site.

#### **5. Vision for the subject site**

The site is envisioned as a natural extension of the Moss Vale urban area. The subject site has excellent potential to develop for residential purposes and to assist Wingecarribee Shire Council in achieving housing targets:

- Crucially, the site is contiguous to urban land, allowing new development to utilize existing infrastructure.
- The site is under the ownership of two cooperative groups, allowing the site to be developed in through a master-planned approach.
- The site's large size enables the provision of buffer areas to surrounding industrial land uses and the protection of important bushland areas.
- Moss Vale plays an important complementary role to the major regional centre of Bowral. While Bowral is the preferred location for infill development in the north subregion, Moss Vale and Mittagong have more distinctive local characters and are thus better suited to accommodating greenfield development.
- Development of the site provides an opportunity to improve the existing environment and implement initiatives to improve sustainability.

Please refer to the Vision Statement attached to this letter for further discussion of the development potential of the site.

We thank you for the opportunity to offer this submission. Please contact me at on 02 8667 8668 or [aboykin@mecone.com.au](mailto:aboykin@mecone.com.au) if you wish to discuss this submission in more detail.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'w.c. Boykin', with a stylized flourish at the end.

Addison Boykin