

Griffith Housing Strategy 2019

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1 Rationale for the Strategy

1.1 Overview

Griffith Council’s *Affordable Housing Background Paper*¹ sets out the evidence that supports the *Griffith Housing Strategy*, and should be read in conjunction with this *Strategy*.

The section provides a summary of relevant findings on housing demand, supply, need and affordability, and the legislative underpinning of Council’s engagement with affordable housing, as a context for the priority strategies set out in Section 2 below.

1.2 What is ‘Affordable Housing’?

Housing is ‘affordable’ when very low, low and moderate income households are able to meet their housing costs and still have sufficient income to pay for other basic needs such as food, clothing, transport, medical care and education. This is generally accepted to be where such households pay less than 30% of their gross household income on housing costs.

The following table provides relevant benchmarks for ‘affordable housing’ for the purpose of this *Strategy*. These are consistent with definitions and benchmarks in the *NSW Environmental Planning and Assessment Act 1979 (NSW)*, and related policies. These should be updated at least annually to reflect CPI changes.

Table 1.1: Relevant Affordable Housing Income and Cost Benchmarks (1)²

	Very low-income household	Low-income household	Moderate-income household
Income Benchmark	<50% of Gross Median H/H Income for Rest of NSW	50-80% of Gross Median H/H Income for Rest of NSW	80%-120% of Gross Median H/H Income for Rest of NSW
Income Range (2)	<\$609 per week	\$975 per week	\$1,462 per week
Affordable Rental Benchmarks (3)	<\$183 per week	\$184-\$293 per week	\$294-\$439 per week
Affordable Purchase Benchmarks (4)	\$102,000	\$256,000	\$400,000

Source: JSA 2019, based on data from ABS (2016) Census indexed to December Quarter 2018 dollars

¹ Judith Stubbs & Associates (2019) *Griffith Affordable Housing Background Paper*, Griffith Council.

² (1) All values reported are in December Quarter 2018 dollars; (2) Total weekly household income calculated as a proportion of ‘Rest of NSW’ medians; (3) Calculated as 30% of total household income; (4) Calculated using NAB’s borrowing power calculator.

The above mentioned Cost Benchmarks are generally in accordance with *SEPP (Affordable Rental Housing) 2009* which defines 'affordable housing' as:

"A household is taken to be a very low income household, low income household or moderate income household if the household:

(a) has a gross income that is less than 120 per cent of the median household income for the time being for the Greater Sydney (Greater Capital City Statistical Area) (according to the Australian Bureau of Statistics) and pays no more than 30 per cent of that gross income in rent, or

(b) is eligible to occupy rental accommodation under the National Rental Affordability Scheme and pays no more rent than that which would be charged if the household were to occupy rental accommodation under that scheme."

What is social housing? Social housing is housing that is provided to eligible households, with rents subsidised to ensure that households pay an affordable rent. Social housing is housing that is owned by the Department of Communities and Justice (public housing) as well as housing that is owned or managed by registered housing providers (community housing).

1.3 Why is Affordable Housing Important?

Anyone in the community could need affordable housing. This includes a young person seeking to live near where they grew up, a recently separated or divorced person with children for whom conventional home ownership may no longer be economically viable, households dependent on one (or even two) low or median waged jobs, or an older person on a reduced retirement income, including after the death of a spouse.

Lack of affordably priced housing not only affects the quality of life of individual families, who may be sacrificing basic necessities to pay for their housing. It also has a serious impact on employment growth and economic development. The inability of lower paid workers to find appropriate, affordable housing can limit the capacity of industry to grow, and adversely affect local economies, as is the case with regional areas like Griffith. The displacement of long-term residents due to lack of affordable housing also reduces social cohesion, engagement with community activities such as volunteering, and extended family support.

Affordable housing is thus an important form of community infrastructure that supports community wellbeing and social and economic sustainability, including a diverse labour market and economy, and strong and inclusive communities.

1.4 Housing Supply and Demand

Griffith is regarded as the 'regional capital of Western Riverina', and a major service centre for a range of inland regional towns. It has a resident population of 27,000 people³ and a regional service

³ ABS (2018) Estimated Resident Population.

catchment of around 60,000 people.⁴ Unlike many rural and regional areas, Griffith has experienced robust historical population growth, largely related to irrigated agriculture and value added activities, and higher than average jobs growth more recently. It has the critical mass to attract people from smaller areas moving up the regional hierarchy, as well as ‘tree-changers’ from metropolitan areas seeking more affordable accommodation and improved lifestyle.⁵

The younger than average age profile, and ongoing inward-migration of young families and overseas migrants to take up semi- and unskilled work opportunities in Griffith, also runs counter to demographic trends for many regional and rural areas, which tend to have a significant loss of younger people and a more rapidly aging population than Griffith.⁶

Future growth of 0.73% per annum is projected, or a **total population of 30,507 and demand for an additional 1,744 dwellings** by 2036.⁷ However, it would be prudent to plan for a higher proportion of well-located strata dwellings in the future dwelling mix than is projected⁸ due to a significant mismatch between current housing supply and need,⁹ and considerable under-occupancy of public housing and of larger owner-occupied homes by older people in the LGA.¹⁰

To this end, there appears to be **sufficient residentially zoned Greenfield land** to meet projected demand for the next 10-15 years. This would provide capacity for around 800 separate houses in Collina Precinct based on recent growth rates, and a higher number of dwellings if a proportion of multi dwelling housing is factored in.

The challenge will likely be in ensuring that there is a **sufficient supply of smaller, well-located dwellings** to meet projected need, noting that there was a fairly static proportion of flats and units from 2006-16, and a relatively small number of villas, townhouses and attached dwellings created over this period. This is also important, as strata dwellings are far more likely to enter the private rental market than separate houses, and to increase the supply of much needed private rental properties for lower income workers and pensioners.¹¹

⁴ Draft Riverina-Murray Regional Plan 2016 < <http://www.planning.nsw.gov.au/~media/Files/DPE/Plans-and-policies/draft-riverina-murray-regional-plan-2016-04.ashx>

⁵ ABS 2016 Census; and JSA (2010) Report 3: Exploring the relationship between community resilience & irrigated agriculture in the Murray Darling Basin: Irrigated Agriculture and Socio-Economic Indicators, for the Cotton Catchment Communities Co-operative Research Centre

⁶ JSA (2010) Report 3: Exploring the relationship between community resilience & irrigated agriculture in the Murray Darling Basin: Irrigated Agriculture and Socio-Economic Indicators, for the Cotton Catchment Communities Co-operative Research Centre

⁷ Based on .id.Consulting projections, which are preferred to the lower NSW Department of Planning and Environment projections as they are closer to recent historical population growth trends, and are also indicated due to much higher than average local jobs growth over the past 5 years (see JSA (2019) *Background Report* for detail).

⁸ Compared with .id.Consulting’s projected household breakdown for the period.

⁹ A theoretical undersupply of 4,500 dwellings suited to single people and couples, and an over-supply of around 2,800 larger dwellings suited to families with children, by 2036 (see JSA (2019) *Background Paper* for detail).

¹⁰ ABS Census, 2001, 2006, 20016; and .id.Consulting population and housing projections for Griffith LGA

¹¹ See JSA (2019) *Background Paper* for detail.

1.5 Need for Affordable Housing

The biggest housing affordability issue facing Griffith is the **large and increasing number of very low income renting households in housing stress**, and the general inability of the housing market to provide for such households. Around 45% of those in ‘housing stress’¹² are very low income renters. When **low income renters** are added, these groups make up **two-thirds of those in housing stress** in the LGA. These groups include households dependent upon pensions and benefits as well as the large pool of local workers in low and very low paid jobs.

The serious pressure on local rental stock is evident in the **very high real rate increase in rents**¹³ **over the past 10 years**, with rents for two bedroom strata dwellings in the LGA growing at double the NSW rate, and rents for three bedroom dwellings growing at four times the NSW rate. In contrast, **local purchase price grew at well below average rates** over the decade. The **pressure is clearly on rental stock**, which is likely affected by the low growth in strata dwellings (in particular, flats and units) in the LGA over the past decade or two.

It is likely that, by 2036, there will be at least **1,160 households in need of affordable housing** in the LGA, 70% in rental stress and 30% in home purchase stress, with a likely need for 60% smaller dwellings suited to singles and couples, and 40% suited to families. On current trends, 50% of affordable dwellings would need to be for very low income households, 30% for low income households, and 20% for moderate income households. This is the basis of affordable housing targets, outlined later in the *Strategy*.

Importantly, Griffith has **higher than average rate of homelessness compared with NSW**, and has experienced an increase in the number and rate of people who are homeless and who are marginally housed since 2011. This includes a high rate of people who are living in severely overcrowded dwellings, in cars and temporary or insecure accommodation rather than ‘street’ homelessness’.

Accounting for homelessness and general population growth, an additional **140 dwellings** should be added to the affordable housing target above,¹⁴ or a total target of at least **1,300 additional affordable dwellings in the LGA by 2036**.

1.6 Housing Affordability

It is important to understand the extent to which the market is, and has the *potential* to deliver affordable housing to relevant target groups. This helps in identifying the most effective strategies, including how much intervention is needed through the planning system.

¹² Paying more than 30% of gross household income on their housing costs, and thus at risk of ‘after housing’ poverty.

¹³ Adjusted for inflation

¹⁴ See JSA (2019) *Background Paper* for detailed discussion.

- **Very low income households are effectively excluded from both the private purchase and private rental market** in Griffith LGA, although some would benefit from an increased supply of smaller one bedroom dwellings in terms of reduced 'cost' if not affordability.
- Most **low income households** could affordably *rent* a one bedroom strata dwelling, although these are in very short supply in the LGA. Two bedroom dwellings were only affordable to the upper 30% of low income renters, although again, smaller households would benefit from an increase in smaller two bedroom strata dwellings in terms of reduced 'cost'. The rental on a three bedroom dwelling was *not* affordable to any low income households, meaning that **low income families with children are particularly disadvantaged**.

Affordable purchase is also a problem for many low income households. All could likely purchase a one bedroom strata dwelling *if* they were more readily available; the upper 70% could afford to purchase a median priced two bedroom strata dwelling; whilst only the upper 10% could afford to purchase a median priced three bedroom strata dwelling. Again, there is a **significant affordability gap for larger low income households**.

- **Moderate income households can generally be housed affordably through the private rental and purchase market** in the LGA, although some households in the lower end of the income band may have difficulty renting or purchasing a separate house.
- **New Generation Boarding Houses** under *SEPP Affordable Rental Housing 2009* would be affordable to **very low income singles and couples who are working**, and are reported to be in high demand in the LGA. However, none have to date been developed locally under the SEPP, despite the good rate of return on new forms of this accommodation, and consultations indicated that there is limited knowledge of the potential of such accommodation to meet local housing need. The stock of such accommodation is currently made up of older, often poor amenity boarding houses.
- Site rental within a **caravan park or more affordable manufactured housing estate (MHE)** would be affordable to low income households, provided they owned their own manufactured home or van or had substantial capital toward the purchase of this type of dwellings. It is also likely that a smaller one or two bedroom mobile home on a rented site would be affordable to some income households, and that a larger home could be affordable to some low income families. However, most permanent or long-term sites have been lost within existing caravan parks, which has left a significant gap in the market.

These findings indicate that **strong intervention** is likely to be required through the planning system, as well as the **direct creation** of affordable rental housing through partnerships on public land, to create affordable housing for the groups who most need it in Griffith LGA.

1.7 Council's role and statutory responsibilities in relation to affordable housing

The creation of affordable housing for very low, low and moderate income households through the planning system becomes more important in the context described above. **The inability of the market to provide for virtually all very low income renters, most low income renters, and many low income purchasers is noted, and is a particular focus of this Strategy. The growing number of homeless and marginally housed people in the LGA is also important.**

There are significant opportunities for local government to support the creation and maintenance of affordable housing through core planning legislation and policies in NSW, and a statutory requirement to consider this issue. Local government has an implicit role in affordable housing and an impact on affordability through land use zoning, controls, the timing of land release, location of services and facilities, and the levying of rates and development contributions.

Local government can also choose to play a more proactive role in the creation and retention of affordable housing through active intervention in the market through the development of appropriate planning mechanisms and strategies.

In NSW, objects and a range of related provisions have been progressively included in the *Environmental Planning and Assessment Act 1979*, including section 1.3(d), which provides that an objective of the Act is the '**maintenance and provision of affordable housing**'. There are likewise definitions and benchmarks related to 'affordable housing' in core legislation and related policies which have been adopted in this *Strategy*.

It is also a requirement of the Act that a consent authority take into account the **social and economic impacts** of a development application as part of a merits assessment under section 4.15(1)(b). This is relevant to development applications that may result in the loss of affordable or low cost housing, as well as the assessment of community benefits involving the creation of affordable housing.

Section 7.4 of the *Act* provides for the making of a **voluntary planning agreement** in relation to a proposed amendment to a planning instrument or development application. Under such a planning agreement, a developer is required to dedicate land free of cost, pay a monetary contribution, or provide any other material public benefit, or any combination of them, to be used for or applied towards a public purpose. 'Affordable housing' as defined in the Act is one of the listed 'public purposes'.

As such, local government has a role and indeed a statutory responsibility to seek to preserve and create affordable housing through the planning and assessment process.

2 Strategies and Mechanisms to Deliver Affordable Housing

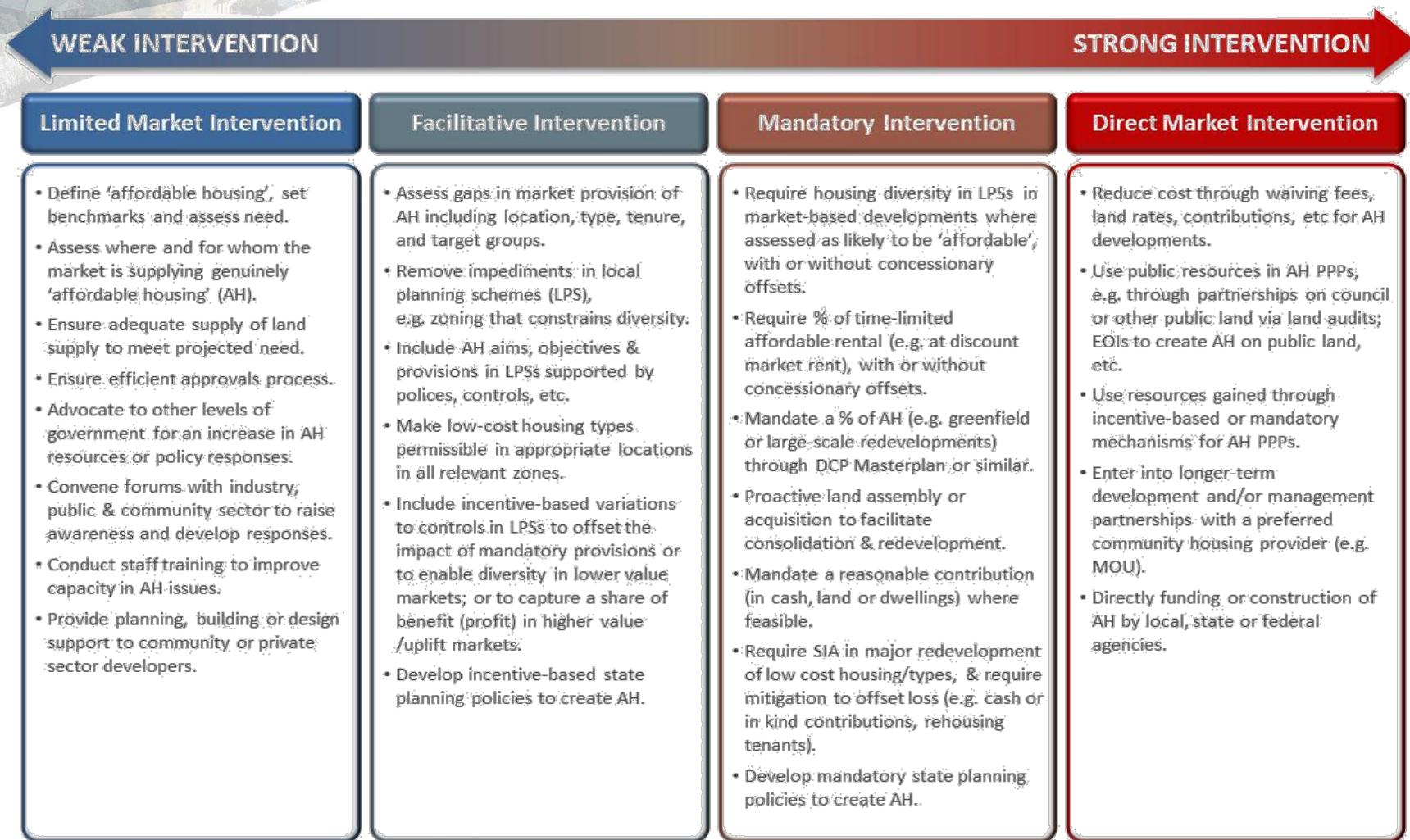
2.1 Overview of Mechanisms and Strategies

There are a wide range of potential strategies available to Griffith City Council to increase affordable housing in the LGA, as shown in **Table 2.1 below**. These strategies range from ‘light’ planning intervention in the market (Column 1 in the table), and facilitative intervention through the planning system (Column 2), to ‘strong’ intervention (Column 3), or ‘direct provision’ of affordable housing (Column 4).

As noted in the *Griffith Affordable Housing Background Paper*¹⁵, some of these strategies are more likely to be effective in the local housing market context. Those likely to be most effective, and that are most favoured from consultations, are the focus of this *Strategy*.¹⁶

¹⁵ JSA *op cit*.

¹⁶ Refer JSA (2019) *Griffith Affordable Housing Background Paper* for a more complete discussion of the effectiveness of different mechanisms in the local context.



Source: Stubbs (2003); JSA (2011).

Figure 2.1: Mechanisms and Strategies to Create Affordable Housing along a Continuum of Planning Intervention

2.2 Summary of Strategies and Mechanisms

Based on the evidence, there are **three main strategies that are likely to be most effective** in increasing the supply of affordable housing in the local context:

1. Ensuring that there is a **clear planning framework** for the development of the *Housing Strategy*, including defensible definitions, benchmarks and targets, and evidence-based mechanisms for transparency and accountability, and monitoring progress of the Strategy over time.
2. Actively seeking to facilitate an increased supply of lower cost and affordable housing types (one and two bedroom strata dwellings and New Generation Boarding Houses) through the market in well-located areas. This mainly involves **ensuring that there are no unnecessary impediments in local planning instruments** to the creation of such dwellings, and requires some fundamental changes to existing planning controls.

Removing impediments to the development of **small lot housing and Multi dwelling housing in Greenfield areas** will also be important in meeting projected need, noting that there is likely to be sufficient zoned land in Collina Precinct and Lake Wyangan to accommodate the projected demand for family dwellings whilst also incorporating increased housing diversity.

3. The **direct creation of affordable housing** for very low and low income renters, and for some low income purchasers, through **partnerships on land owned by Council and other public authorities**. This includes as part of well-located multi-tenure developments, affordable seniors housing, selective redevelopment of older public housing stock to better meet projected need, and a demonstration affordable MHE project for low income workers and families. The preferred partner would be a registered Community Housing Provider with a strong track-record in development and management of affordable housing and a local presence, as this is likely to increase yield and decrease risk for Council.

Other strategies are also likely to have some effect on increasing access to affordable and lower cost housing. These include:

4. Seeking to facilitate market delivery of lower cost and affordable housing types such as long-term accommodation in **Manufactured Housing Estates and New Generation Boarding Houses** through promotion of opportunities for this form of development, production of guidelines and educational materials, demonstrations projects and identification of potential sites.;
5. Advocating to State Government for an **increase in social housing** and Specialist Housing Services funding in recognition of below average provision of such accommodation and growing need;

6. Seeking to **engage large local employers** in a demonstration project to increase medium to long term rental accommodation (e.g. through participating in good quality, affordable MHE and/or New Generation Boarding House projects);
7. A **shared equity pilot project** for low income working families on Council and/or private land; and
8. **Providing incentives** for the development smaller, low cost strata dwellings close to Griffith town centre through reduced parking controls and changes in planning controls more generally.

Other mandatory mechanisms related to **value capture**, including mandatory affordable housing contributions or inclusionary zoning approaches under the recently amended *SEPP 70 (Affordable Housing)* are unlikely to be economically feasible in the local housing market context, despite a likely ability to demonstrate 'local housing need' under the SEPP. Likewise, mandating smaller dwellings is likely to create an impost upon development in the local context due to relatively land values.

Other incentive based mechanisms like FSR bonuses that also rely on significant land value uplift are also unlikely to be feasible in the local context due to low land values and relatively low rates of value uplift from up/rezoning.

The strategies and mechanisms **most likely to be effective** in the local context are outlined more fully below, with a brief rationale for each.

2.3 Detailed Strategies and Mechanisms

2.3.1 Adopt the Housing Strategy

Rationale

It is important that Council is clear regarding the definition and benchmarks for 'affordable housing' so that it ensures that what is created meets the statutory definition, and so that it can properly evaluate applications or proposals that come before it.

It is also important that Council has mechanisms for monitoring the progress of the *Strategy*, including Key Performance Indicators and indicative targets based on local housing need.

Strategies

Strategy 1

For the purpose of this *Strategy*, Council adopts the definitions and benchmarks for ‘affordable housing’ as set out in Section 1.1 and the following table.

Table 2.1: Relevant Affordable Housing Income and Cost Benchmarks (1)¹⁷

	Very low-income household	Low-income household	Moderate-income household
Income Benchmark	<50% of Gross Median H/H Income for Rest of NSW	50-80% of Gross Median H/H Income for Rest of NSW	80%-120% of Gross Median H/H Income for Rest of NSW
Income Range (2)	<\$609 per week	-\$975 per week	\$1,462 per week
Affordable Rental Benchmarks (3)	<\$183 per week	\$184-\$293 per week	\$294-\$439 per week
Affordable Purchase Benchmarks (4)	\$102,000	\$256,000	\$400,000

Source: JSA 2019, based on data from ABS (2016) Census indexed to December Quarter 2018 dollars

Strategy 2

For the purpose of this *Strategy*, Council adopts an indicative target of 1,300 additional affordable housing dwellings by 2036, distributed as follows.

¹⁷ (1) All values reported are in December Quarter 2018 dollars; (2) Total weekly household income calculated as a proportion of ‘Rest of NSW’ medians; (3) Calculated as 30% of total household income; (4) Calculated using NAB’s borrowing power calculator.

Table 2.2: Indicative Targets for Affordable Housing to 2036

		Renting Households		Purchasing Households	
		Suitable for Lone Persons or Couples without Children	Suitable for Families	Suitable for Lone Persons or Couples without Children	Suitable for Families
Total AH Dwellings Required by 2036	Affordable to Very Low Income Households	453 ¹⁸	198 ¹⁹	31	10
	Affordable to Low Income Households	97	152	62	81
	Affordable to Moderate Income Households	18	40	52	108

Source: JSA calculations, using data from ABS Census of Population and Housing 2016 and id. Consulting

Strategy 3

For the purpose monitoring the progress of this *Strategy*, Council adopts the following Key Performance Indicators:

- Number of affordable rental dwellings for very low and low income households created as a result of partnerships between Council and community housing providers and/or the private sector. Data can be collected by Council;
- Net change (loss/gain) in Social (Public and Community) Housing. Data can be obtained from FACS – Housing NSW and local community housing providers;
- Number of affordable rental dwellings for very low and low income households created through other agencies or mechanisms, including FACS – Housing NSW and Community Housing Providers. Data can be collected by Council;

¹⁸ Includes 70% of the target for chronically homeless people (140 x .7 = 98)

¹⁹ Includes 30% of the target for chronically homeless people (140 x .3 = 42)

- Number of affordable housing dwellings for very low and low income renters and low income purchasers provided through the market. Data can be obtained from FACS – Housing NSW Rent and Sales Reports;
- Increase in supply of lower cost housing types/products created through the market. Data can be obtained from FACS – Housing NSW Rent and Sales Reports;
- Reduction in local homelessness, including appropriate accommodation of people living temporarily with others, or living in inappropriate, unsafe or severely over-crowded accommodation. Data can be provided by agencies such as Specialist Housing Services;
- Reduction in the proportion of very low and low income households in housing stress. Data can be obtained from the Census every five years;²⁰
- Retention of diverse income, age and employment groups in the LGA. Data can be obtained from the Census every five years.

2.4 Facilitative Strategies and Mechanisms

2.4.1 Removing Planning Impediments for Residential Flat Buildings and Multi Dwelling Housing in Well-Located Infill Areas

Rationale

There are opportunities for the market to deliver affordable housing to some groups, generally in the form of **one and two bedroom strata dwellings**, albeit mainly for smaller households. An increase in this type of housing in well-located areas will also provide much-needed housing diversity and help to address the current and projected housing supply-demand mismatch.

One and two bedroom **Residential flat buildings** have historically provided a lower cost if not always 'affordable' form of accommodation, but the supply of this form of housing has been significantly constrained since the introduction of the Griffith DCP 1999. Two main provisions in the 1999 DCP have generally rendered such developments non-viable, and also appear to be constraining multi dwelling housing like villas and townhouses. These are:

- The use of different **density controls** across Council Planning Precincts, which place significant constraints on the number of dwellings per hectare, and thus restricts what can *actually* be built on many lots.
- The requirement for **50m² of private open space per ground floor dwelling**, which favours separate houses over Residential flat buildings, and can also be restrictive in the case of Multi

²⁰ Note that levels of housing stress on very low and low income households can be reduced if increasing housing costs cause these people to be displaced. Consequently this KPI must be considered in the context of changing demography as set out in the next KPI.

dwelling housing in infill and release areas. This requirement can significantly affect the viability of Residential flat buildings and Multi dwelling housing, and often whether they can be built at all.

- The relatively **stringent car parking requirements for strata dwellings**, including in areas close to the town centre,²¹ are also likely to constrain the development of Residential flat buildings, and potentially of Multi dwelling housing.

The current **review of Council's DCP** provides an important opportunity to amend relevant controls to facilitate diverse, affordable and/or lower cost housing though the market close to Griffith town centre, that is, within the Planning Precincts of **Griffith Central, Wakaden North, Hospital and Coolah**. Housing diversity, cost and affordability in existing and future release areas (**Collina and Lake Wyangan**) would also benefit from similar amendments to controls.

General strategies related to the DCP review are set out first. This is followed by the rationale for changes in controls for Griffith Central, Wakaden North, Hospital and Coolah Precincts, and specific strategies for each Precinct.

Strategies

Strategy 4

Council will support amendments to its revised DCP that seek to facilitate the development of diverse, affordable and/or lower cost housing, in particular:

- a. Inclusion of relevant objectives:
 - i. Provide for a diversity of housing opportunities and residential lifestyle choices;
 - ii. Optimise residential development opportunities which fulfil the housing supply needs generated by the growth of the population and economic development of Griffith;
 - iii. Strategically implement the Griffith Housing Strategy.
- b. Include controls that facilitate affordable and lower cost Residential flat buildings and Multi dwelling housing through the market in relevant DCP chapters (*Development in Residential Zones*, and *Development in Business Zones*) within the Planning Precincts of **Griffith Central, Wakaden North, Hospital and Coolah**, and in **Collina and Lake Wyangan** release areas, specifically:
 - i. Remove **any requirement** for the requirement private open space for ground floor dwellings in the case of Residential flat buildings;
 - ii. In the case of Multi dwelling housing, **reduce the requirement** from 50m² to 16m² of private open space per ground floor dwelling, including a minimum dimension of 3 metres;

²¹ There is a generic control across the LGA of one onsite space per one bedroom dwelling; 1.5 spaces per two bedroom dwelling; and 2 spaces three bedroom dwelling regardless of location or dwelling type.

- iii. Remove existing density provisions (dwellings per hectare), and **replace** these with Floor Space Ratio (FSR) or exempt some Precincts as set out in Strategies 5, 7, 8 and 9 below;
- iv. **Reduce car parking requirements** to more closely reflect actual ownership rates as set out in 5, 7, 8 and 9 below;
- v. **Remove the requirement** for 'designated lots' for Multi dwelling housing to open up increased opportunities for villas and townhouses across Griffith.

Rationale – Griffith Central Precinct

B2 zoned areas in Central Griffith Precinct contain many redevelopment opportunities, particularly in the areas **between Yambil Street and Canal Street, and north of Olympic/Railway Streets**; and within the B4 zoned area at the western end of the Precinct. JSA's economic analysis indicates that changes to controls as set out above, ground floor open space requirements accompanied by appropriate FSR or no FSR, Height and parking controls, would likely facilitate an increased in Residential flat buildings and Multi dwelling housing in areas and on lots where these are not currently feasible.²²

It is also important that there are no other unintended barriers to the development of Residential flat buildings within this precinct. For example, a requirement for all development in the B2 zone to have ground floor commercial space, and for a high proportion of the total development to be commercial, can be a significant disincentive to re/development where commercial land is not at a premium or in high demand.

Further, although Residential flat buildings are permitted with consent in B2 zones,²³ **selective rezoning** to B4 in this area could signal Council's intention to encourage the development of 'Residential flat buildings' as a form of 'Residential accommodation', and make it an *explicitly* permitted land use.²⁴ Importantly, an objective of the B4 zone is *'To increase the permanent population and encourage the provision of affordable housing in mixed use areas through shop top housing and residential flat building development.'*

²²

²³ Residential flat buildings are an innominate use within B2 zoning in Griffith LEP 2014, although under item 3 'Permitted with consent', the LEP states that anything not specified in item 4 'Prohibited' is also permitted with consent. Residential accommodation and Residential flat buildings are not specified and so are understood to be permitted with consent.

²⁴ Residential flat buildings are an innominate use within B2 zoning in Griffith LEP 2014, although under item 3 'Permitted with consent', the LEP states that anything not specified in item 4 'Prohibited' is also permitted with consent. Residential accommodation and Residential flat buildings are not specified in item 4, and so are understood to be permitted with consent.

There also appears to be a **good economic case** for rezoning the areas between Yambil Street and Canal Street, and north of Olympic/Railway Streets to B4, based on significant remaining opportunities for commercial re/development within Banna Avenue and the north side of Yambil Street.

Alternately (or in the interim), different controls can be put in place within the existing B2 zone in the new DCP. These different controls should encourage high quality retail and commercial development and Shop top housing for development along Banna Avenue and the north side of Yambil Street; and allow for increased development of Residential flat buildings without the requirement for commercial development, but with the **option** for this to occur by virtue of its B2 zoning, in the areas back from 'high street' (that is, between Yambil Street and Canal Street, and north of Olympic/Railway Streets).

Opportunities have also been developed for significant development of Residential flat buildings on larger parcels of vacant land in the area immediately east of Crossing Street currently zoned B7, which could be rezoned to B4 or R3 if the economic case for rezoning of a portion of existing B7 land could be made.

Strategies

Strategy 5

Council will seek to facilitate the development of Residential flat buildings in **Central Griffith Precinct** (zoned B2 and B4) through supporting appropriate controls in the new **DCP** as follows:

- a. Providing for a Floor Space Ratio of-1.5:1 or higher or exempting the Precinct from an FSR restriction;
- b. Providing for parking requirements as follows for Shop-top housing, Residential flat buildings, and Multi Dwelling Housing:

i. Small (<75m ²) or 1 bedroom:	0.5 parking spaces
ii. Medium (75m ² -110m ²) or 2 bedrooms:	1.0 parking spaces
iii. Large (>110m ²) or 3+ bedrooms:	1.5 parking spaces
iv. Visitor spaces:	0.25 parking spaces
- c. Balancing the future demand for high quality commercial development within Banna Avenue and the north side of Yambil Street with the need for economically feasible Residential flat buildings in areas with significant redevelopment potential close to the city centre through. Providing for different controls across the B2 zoning through a DCP map, specifically:
 - i. Providing for **all development within Banna Avenue and the north side of Yambil Street** to have retail or commercial uses on the ground floor with generous floor to ceiling heights, and a reasonable proportion of each new development to be made up of commercial or retail space; but
 - ii. Providing **no such requirements** for commercial ground floor development, or for any proportion of new development to be commercial, within the areas between the

southside of Yambil Street and Canal Street, and the northside of Olympic/Railway Streets, thus allowing for market assessment of the viability of mixed use development, and opening up opportunities for Residential flat buildings without an additional economic impost. This will limit the B2 zoning to Banna Avenue and the north side of Yambil Street and limit residential development to shop-top housing in this zone.

Strategy 6

In the longer term, Council will seek to encourage increased development of Residential flat buildings in **Central Griffith Precinct** through **amendments to its LEP**, in particular, actively facilitating Residential flat buildings through:

- a. Rezoning the area between the southside of Yambil Street and Canal Street and northside of Olympic/Railway Streets from B2 to B4, thus providing a clear signal of Council's intent for this area;
- b. Preparing a planning proposal including an assessment of the adequacy of land zoned B2 in the Precinct and the economic case for the rezoning selected areas to B4, noting that the *Background Paper* contains relevant data to support the case;
- c. Considering rezoning of a portion of land immediately east of Crossing Street from B7 to B4 or B3 provided the economic case for rezoning can be made with regard to a loss of some B7 zoned land.

Rationale – Wakaden North Precinct

Similar to other areas, this precinct contains a large number of older residential flat buildings that pre-date the 1999 DCP, with more recent development consisting of multi dwelling housing, likely due to DCP constraints discussed earlier. There are more limited opportunities for redevelopment within the existing Precinct boundaries. However, additional redevelopment opportunities could be obtained by **extending the precinct north to Binya Street**, which is within 400 metres of the current B2 zoned area.

Strategies

Strategy 7

Council will seek to facilitate the development of Residential flat buildings and Multi dwelling housing in **Wakaden North Precinct** (zoned R1) through supporting amendments to controls in the DCP as follows:

- a. Extending the Precinct north to Binya St, rezoning the entire precinct to medium density residential to solidify the strategy to promote higher densities;
- b. Providing for a Floor Space Ratio of 1.5:1 or higher or exempting the Precinct from an FSR restriction;

c. Providing for parking requirements as follows for Residential flat buildings and Multi dwelling housing:

- | | |
|--|---------------------|
| i. Small (<75m ²) or 1 bedroom: | 0.5 parking spaces |
| ii. Medium (75m ² -110m ²) or 2 bedrooms: | 1.0 parking spaces |
| iii. Large (>110m ²) or 3+ bedrooms: | 1.5 parking spaces |
| iv. Visitor spaces: | 0.25 parking spaces |

Rationale – Coolah Precinct

Coolah Precinct also contains extensive historical development for Residential flat buildings, although again none of these appear to be of recent construction, with newer construction generally for Multi dwelling housing.

There are significant redevelopment opportunities in the precinct including of older, lower quality housing and industrial and commercial uses, as well as underutilised land. Opportunities for redevelopment of housing are mainly available in the area between Coolah Street and the Canal.

Strategies

Strategy 8

Council will seek to facilitate the development of Residential flat buildings and Multi dwelling housing in **Coolah Precinct** (zoned R1) through supporting amendments to controls in the DCP as follows:

- a. Providing for a Floor Space Ratio of 1:1 or higher or exempting the Precinct from an FSR restriction;
- b. Providing for parking requirements as follows for Residential flat buildings and Multi dwelling housing:

i. Small (<75m ²) or 1 bedroom:	0.5 parking spaces
ii. Medium (75m ² -110m ²) or 2 bedrooms:	1.0 parking spaces
iii. Large (>110m ²) or 3+ bedrooms:	1.5 parking spaces
iv. Visitor spaces:	0.25 parking spaces

Rationale – Hospital Precinct

Hospital Precinct should also be targeted to increase market delivery of Residential flat buildings and Multi dwelling housing as it is within close proximity to Griffith's commercial core, and has opportunities for redevelopment for lower cost or affordable housing types, including Residential flat buildings and Multi dwelling housing, with appropriate controls.

Strategies

Strategy 9

Council will seek to facilitate the development of Residential flat buildings and Multi dwelling housing in **Hospital Precinct** (zoned R1) through supporting amendments to controls in the DCP as follows:

- a. Rezoning the entire precinct to medium density residential to solidify the strategy to promote higher densities;
- b. Providing for a Floor Space Ratio of 0.7:1 or higher or exempting the Precinct from an FSR restriction;
- c. Providing for parking requirements as follows for Residential flat buildings and Multi dwelling housing:
 - i. Small (<75m²) or 1 bedroom: 0.5 parking spaces
 - ii. Medium (75m²-110m²) or 2 bedrooms: 1.0 parking spaces
 - iii. Large (>110m²) or 3+ bedrooms: 1.5 parking spaces
 - iv. Visitor spaces: 0.25 parking spaces

2.4.2 Increasing Opportunities for Housing Diversity and Affordability in Greenfield Areas

Rationale

Collina Precinct is the major current release area in Griffith, and is located around 6 kms from the CBD. While Multi dwelling housing is permissible with consent in the R1 zone, there is no evidence of such development in the precinct. As noted, development of Multi dwelling housing is likely to be constrained by DCP density controls and requirements for ground floor private open space and onsite parking requirements, as well as requirement for designation of lots for Multi dwelling housing.

JSA's modelling suggests that villa construction would be economically viable assuming with more liberal controls and the removal of the requirement for designated lots for Multi dwelling housing. This would also increase dwelling yield in the precinct.

Lake Wyangan Master Plan /DCP area is likely to provide for further Greenfield expansion once the Collina Precinct is fully developed.²⁵ Based on the availability of land in the Collina area, rezoning in this area to R1 is likely to be required by 2030. Similar constraints to housing diversity and affordability

²⁵ Advice from Council officers, 11 December 2018.

would apply as for Collina Precinct without changes to the DCP and/or LEP, and similar amendments are required to facilitate housing diversity.

Strategies

Strategy 10

Council will seek to facilitate the development of diverse housing options in **Collina Precinct** (zoned R1) through supporting amendments to controls in the DCP as follows:

- a. Providing for a Floor Space Ratio of between 0.5:1 and 0.7:1 across the Precinct;
- b. Providing for parking requirements as follows for Residential flat buildings and Multi dwelling housing:
 - i. Small (<75m² or 1 bedroom: 0.5 parking spaces
 - ii. Medium (75m²-110m²) or 2 bedrooms: 1.0 parking spaces
 - iii. Large (>110m²) or 3+ bedrooms: 1.5 parking spaces
 - iv. Visitor spaces: 0.25 parking spaces
- c. Increase the amount of multi-dwelling housing lots in new subdivisions to 25%.

Strategy 11

Council will seek to facilitate the development of diverse housing options in **the Lake Wyangan Master Plan /DCP area** (zoned R1) through supporting the following controls:

- a. Providing for a Floor Space Ratio of 0.5:1 and 0.7:1 across the Precinct;
- b. Providing for parking requirements as follows for residential flat buildings and multi dwelling housing:
 - v. Small (<75m² or 1 bedroom: 0.5 parking spaces
 - vi. Medium (75m²-110m²) or 2 bedrooms: 1.0 parking spaces
 - vii. Large (>110m²) or 3+ bedrooms: 1.5 parking spaces
 - viii. Visitor spaces: 0.25 parking spaces
- c. Ensure the Lake Wyangan Master Plan includes adequate sized lots for multi-dwelling housing.

2.4.3 Facilitating Increased Development of 'New Generation' Boarding Houses

Rationale

'New Generation' Boarding Houses under *SEPP (Affordable Rental Housing) 2009* can provide affordable accommodation to diverse very low and low income households, and fill an important gap

for a range of very low and low income retirees, workers, and other singles and couples. The option to develop New Generation Boarding Houses under SEPPARH is readily available in residential and business zones within Griffith LGA. However, there appears to have been very limited take up by developers or Community Housing providers to date.

Economic modelling reported in the *Background Paper* suggests that these are likely to have a good rate of return, so that increased awareness and promotion of best practice would also likely be beneficial (see **Case Study Booklet** for examples of best practice).

Strategies

Strategy 12

Council will actively promote and support the development of high quality, 'New Generation' Boarding Houses in locations within 400 metres of B2 or B4 zoning in Griffith, including through educational workshops with developers and the community, publication of guidelines, production of promotional material, and favourable consideration of compliant applications.

Strategy 13

Council will develop controls in the Development Control Plan consistent with State Government Policy and Legislation to support the development of good design and management of 'New Generation' Boarding Houses taking into account local needs and the housing market context, and make these publicly available (see Outline of Consideration for Guidelines and Plan of Management at **Attachment A**).

2.4.4 Opening up Development Opportunities for CVPs and MHEs

Rationale

Caravan parks have historically been an important source of affordable accommodation in Griffith LGA, including for lower income families, people on pension and benefits and lower income and seasonal workers.

On-site vans and manufactured homes that can be rented with the site, and sites which are rented where residents place their own home, have the potential to be affordable to all low income households and some very low income households. However, are virtually no permanent or long-term sites remaining in privately owned and operated facilities in the LGA through conversion to tourist and short-term uses, and there is reported to be a high demand for such accommodation.

Although short-term site (3 months or less) may benefit short-term casual workers or more transient people, they will not meet the accommodation needs of lower income working families and workers who are seeking more stable rental accommodation.

There is a need to encourage the development of additional long-term sites within existing facilities, as well as the development of additional privately operated and lower cost manufactured housing estates as a relatively efficient way of providing accommodation for lower income families and

workers. There are also opportunities to develop more affordable manufactured housing estates that are owned/ managed by Council and/or a registered community housing provider on publicly owned land with favourable rates of return as an example of best practice in this area.

Strategy 14

- a. Council will develop guidelines to encourage a higher proportion of permanent sites within caravan parks and MHEs that are principally tourist-oriented developments, and provide for a higher proportion of such sites in licensing arrangements;
- b. Council will identify potential sites for additional private caravan parks and manufactured housing estates, and seek to develop private sector investment through relevant planning incentives.

2.4.5 Selective Redevelopment of Older Public Housing Properties

Rationale

There are opportunities to **selectively redevelop older, under-occupied social housing close to the town centre** which should also be explored with State Government. The replacement of older, under-occupied separate houses with new mixed tenure developments including strata dwellings can better meet the need for smaller social housing dwellings, and also provide affordable rental and purchase housing for low income workers, whilst retaining a reasonable component of houses suitable for families.

This is in line with current State Government policy directions to improve the quality of life and standard of housing in areas with large concentrations of public housing, and with Government priorities to increase the capacity and economic viability of community housing providers through the transfer public housing on long-term leases. This enables providers to borrow against the asset to enable redevelopment, which is occurring other parts of the State. To date, no such scheme has been announced for Griffith.

Opportunities for selective redevelopment of older public housing stock close to the town centre are available in **Wakaden North Precinct**. Other opportunities include the **selective redevelopment of dwellings or areas within large scale public housing estates in Macarthur and Merrigal Precincts** to better meet current and projected housing need for smaller very low income households in the LGA for both social housing and affordable rental housing for lower income workers.

Strategies

Strategy 15

- a. Council will explore opportunities with State Government and local Community Housing Providers for the redevelopment of older concentrations of social housing in Wakaden North Precinct, including for smaller, more diverse housing types and multi-tenure development including social, affordable and private market housing to meet changing needs.

- b. Council will advocate to State Government on behalf of local Community Housing Providers (CHPs) for a transfer or title and/or long-term (at least a 20-year lease) on existing public housing in Wakaden North Precinct to facilitate the redevelopment of selected stock through increased economic viability for CHPs.

2.5 Direct Creation of Affordable Housing

Direct Creation of Affordable Housing

The **direct creation of affordable housing** on Council and other publicly owned land is likely to be the most effective strategy for creating affordable housing for very low and many low income renting households. As noted, such households are largely excluded from the private market, and often in severe housing stress and at risk of homelessness.

This land can be developed under a variety of contractual arrangements, for example, by Council directly developing the land and contracting in the skills required, or in partnership with a community housing provider (CHP) and/or private sector developer. Management would normally be undertaken by a CHP with expertise in this area. Financially, the arrangement can be structured in a number of ways, depending on Council's preference. Likewise, risk can be shared in a manner appropriate to the needs and preferences of partnering agencies.

A first cut assessment of the suitability of a range of Council and other publicly owned sites has been undertaken with regard their size, location, zoning and freedom from significant constraints, and is reported in **Section 6.5.3 of the Background Paper**. A range of development scenarios were then **modelled in a preliminary** way to assess the likely feasibility of affordable housing developments in the local housing market context on indicative sites.

Our preliminary assessment indicates that these **indicative developments on Council-owned land are likely to be economically feasible** (that is, income would exceed costs at year one). Developments modelled included a multi-tenure affordable villa development, a multi-tenure affordable residential flat building, and a New Generation Boarding House on sites in Central Griffith, Wakaden North, Hospital and Coolah Precincts; and an affordable MHE or caravan park on Council-owned land in Lake Wyangan and Crown land at the Griffith Show Ground, although the latter already accommodates around 50 very low and low income households, a number of them long-term.

Assumptions used in economic modelling are conservative, and varying these would make the developments even more favourable.

A seniors' development targeting older pensioners would not break even unless somewhat higher than 'affordable' rents were charged due to the very low incomes of lone pensioners, although at \$230 per week, such rental would still likely provide lower cost rental than is often available through the market, in a community setting.

Strategies

Strategy 16

- a. Council will endeavour to explore **Council and publicly owned sites** for the purpose of affordable housing partnerships. Suitable sites should include the following characteristics:
 - well located with regard to transport and/or services;
 - maximise the yield of social and affordable housing;
 - are multi-tenure developments; and
 - are able to achieve favourable economics (at least break even in the first year).

Strategy 17

- a. Council will facilitate a **multi-tenure development on Council-owned land** within or in close proximity to Griffith town centre in partnership with a registered community housing provider and/or other not for profit service provider in the short-term.
- b. This development will be a multi-tenure development and will be targeted to very low and low income renting households and to low income purchasing households, and will seek to include:
 - A portion as a New Generation Boarding House providing rental accommodation to very low income renting lone person or couple households;
 - One and two apartments providing affordable accommodation to very low income and low income renters who are lone person, couple and smaller family households and purchase for low income households, possibly including some shared equity;
 - Adequate provision for Adaptable Dwellings on the ground floor per AS 4299.
- c. Council will seek to develop the site through a competitive tendering process (an expression of interest) or preferred partnering arrangement with a registered community housing provider that clearly specifies requirements for the site including maximisation of affordable housing yield, indicative dwelling type and tenure mix, risk apportionment and long-term management and maintenance arrangements.

Strategy 18

- a. Council will evaluate **dedicating at least a further two sites to multi-tenure affordable housing developments** within or in close proximity to Griffith town centre.
- b. Potential sites identified by Council could be developed in partnership with a registered community housing provider and/or appropriate NHO under an EOI or preferred partnering arrangement.

Strategy 19

- a. Council will investigate the development of an **affordable caravan park /manufactured housing estate** in partnership with a registered community housing provider and/or private sector development on vacant Crown land at the Show Ground complex, including that:
 - i. The development is mixed tenure, and allows for the rental of sites with owner occupied homes (owner-renters), as well as the rental of both manufactured homes and sites (renter-renters);
 - ii. Rents of sites and sites with homes are affordable to a mixture of very low and low income households
- b. Following review of the operations of a first facility, Council will investigate the development of a further **affordable caravan park /manufactured housing estate** in partnership with a registered community housing provider and/or private sector development on vacant Council or other public land as appropriate.
- c. Council will advocate for affordable worker dwellings through partnerships with the private sector and large employers in the surrounding villages.

2.5.1 Shared Equity Arrangements

Rationale

One of the main ways that low income purchasers requiring a larger home, especially those at the lower end of the band, and all very low income households without a substantial asset, can enter the home purchase market is through some form of shared equity arrangement.

Typically, a purchaser will enter a shared equity arrangement with a community housing provider where they own 25-75% of the equity in the home on the basis that they will sell the home back to the provider if they wish to exit the arrangement, as well as a pre-agreed share of the capital gain. Under some schemes, they can increase their share of equity over time.

This ensures that the home stays as affordable purchase in perpetuity, and that the first purchaser does not obtain a windfall profit from the sale of a home where there has been a public subsidy (as is often the case in more standard subsidised home purchase arrangements). Partnering with a community housing provider rather than a bank or private sector developer tends to keep costs lower for the purchaser, although the latter could be involved in a 3- or 4-way partnership.

This type of arrangement is not generally as well-developed in NSW as it is in some other Australian and international jurisdictions, and there are no government supported schemes in NSW. However, it is likely to work well in the local context, and a scheme similar to ones that operate in other jurisdictions could be developed by a Community Housing Provider such as Southern Cross Community Housing, potentially in partnership with a financial institution, and/or on Council-owned land.

Strategies

Strategy 20

Council will develop a locally appropriate shared equity purchase model to facilitate the purchase of housing by low income households, in conjunction with a registered community housing provider.

Strategy 21

Council will investigate the potential for development of small lot housing on a privately owned Greenfield site, and appropriate mechanisms, funding and legal agreements to implement an appropriate model or demonstration project including opportunities for shared equity approaches.

2.5.2 Advocacy

Rationale

There has been a **loss of social housing** in both proportion and absolute terms over the past 10 years, with social housing falling from 5.5% of all dwellings to 4.4% from 2006 to 2016, which was lower than the NSW average in 2016 (5%). Waiting times for social housing in the LGA are in excess of 10 years for smaller dwellings, and rates of severe housing stress among very low income renters indicate a high level of unmet need for social housing in the LGA.

Higher than average and growing rates of homelessness and marginally housed people also indicate that there is a need for alternative accommodation to meet the special needs of these groups.

Strategies

Strategy 22

- a. Investigate and advocate for temporary affordable housing opportunities on NSW Government land that is awaiting future development.
- b. Advocate for an increase in funding and support arrangements for social housing to meet the needs of very low income and special needs groups in the LGA.

2.6 Administration and Maintenance

2.6.1 Administration

Rationale

There is a need for transparent reporting and accountability with regard to administration of Council's affordable housing program, and to ensure that the *Strategy* is effective in achieving its objectives. Adequate responsive, recurrent and planned maintenance is also vital to ensure the amenity of the properties and locality, and the longevity of stock.

Strategy 23

Council will establish required administrative mechanisms to ensure proper monitoring, management and administration related to the *Strategy*, and any Affordable Housing Program resulting from this, including:

- Annual reporting against KPIs;
- Transparent processes for the selection of affordable housing partners, whether on the basis of competitive tendering on individual projects, or a preferred partner basis;
- The establishment of a separately accounted and reported Affordable Housing Trust Fund to hold any resources generated through the *Strategy* (for example, affordable housing units created in perpetuity).

2.6.2 Asset Maintenance

Rationale

Adequate provision for responsive, recurrent and planned maintenance is also vital to ensure the amenity of the properties and locality, and the longevity of stock.

Strategy 24

Council will ensure that partnering and management arrangements with a registered community housing provider include adequate budgetary provision and planning for maintenance and facilities management including:

- Responsive maintenance within the required timeframe;
- Recurrent maintenance, such as minor works, gardening, etc to ensure high quality amenity; and
- Planned maintenance, such as external painting, roof and fence replacement, including a planned maintenance schedule and regular asset condition audits.

2.6.3 Additional Strategies as Recommended by Griffith City Council

Rationale

In the process of development the Griffith Housing Strategy 2019 Griffith City Council has determined further initiatives that can be undertaken to promote the further development of affordable housing.

Strategy 25

Currently, Council's Section 7.12 Contributions Plan requires the payment of 1% of the cost of construction of a development as a levy, including affordable housing. Council will investigate implementing an exemption for housing demonstrated to be affordable from paying Section 7.11 and 7.12 Contributions. The Plan could be amended to specifically exclude affordable housing Development Applications.

Strategy 26

SEPP (Affordable Rental Housing) 2009 covers the development of secondary dwellings as a form of affordable housing. The policy sets out lot requirements, maximum site coverage and floor area for complying developments. Presently secondary dwellings are required to pay Section 64 Contributions totalling around \$8,000. Secondary dwellings often contain a single bedroom and are only occupied by one person. The secondary dwelling occupies land previously used for gardens and lawns. Locating a secondary dwelling in the rear yard would decrease the amount of water required for landscaping. Council could advocate for the development of secondary developments by taking the following actions:

- a. Exempt Secondary Dwellings from paying Section 64 Contributions.
- b. Provide guidelines for secondary dwellings. Precincts around the CBD of Griffith contain large lots which would easily support secondary dwellings and even larger lots in Collina can adequately support secondary dwellings. Landowners may be aware that their lot is appropriate for a secondary dwelling. An easily interpreted guide could be sent out with rates notices in particular areas which Council would support additional dwellings. A list of local suppliers of secondary dwellings could also be provided.

Strategy 27

Council will investigate the use of a medium density housing code (complying development) in Griffith. In some precincts close to the CBD, including **Wakaden North, Coolah and Central Griffith** (which have been recommended as being rezoned to medium density residential) the use of a complying development code for affordable or high density housing could be developed. This would provide surety to developers that if they meet certain development and design standards, their development would be approved in 14 days.

Strategy 28

Any existing Restriction as to User pursuant to Section 88B of the *Conveyancing Act* on the title of a lot in Griffith which restricts the construction of a single dwelling on the lot should not also restrict the construction of a secondary dwelling. The meaning of a dwelling on these 88B Instruments should be construed as meaning a primary dwelling which would not restrict the construction of a secondary dwelling on the lot.

Attachment A:

Outline of Consideration for Guidelines for New Generation Boarding Houses

Guidelines would include the following types of provisions:

- Need for consistency with 'local character', including guidance from Council
- Amenity of rooms, including passive solar access, ventilation, storage, and preferred provision of self-contained kitchen that is well-equipped (e.g. with two burners, oven, microwave, sink and small fridge), and of en suite bathroom;
- Amenity of outdoor open space, including all weather cover, seating and tables, attractive landscaping, etc);
- Shared ('private') open space be provided at 5m² for each ten lodgers, with a minimum of 20m² for any Boarding House development
- Where boarding rooms are **not** fully self-contained (with en suite bathroom, laundry and kitchen facilities), at least the following criteria will be considered adequate):
 - The communal kitchen and dining area is to be a minimum of 15m², with at least 1m² per lodger over 6 lodgers
 - One washing machine and tub should be provided for every 10 lodgers
 - One clothes drier or 20m of external line should be provided for every 10 lodgers
 - Bathrooms must be at least 5m² and comply with BCA requirements.
- A **Plan of Management** should be provided which addresses:
 - Fees for residency
 - Management and supervision through an on-site manager or regular visits
 - Kitchen usage, the provision of meals or resident provision of meals
 - Noise inside the boarding house and in adjacent private open space areas
 - Use of communal space and facilities
 - Parking for cars
 - Cleanliness and maintenance of the property and grounds
 - House rules (covering issues such as access to rooms, keeping shared facilities clean and tidy, visitors, pets, quiet enjoyment etc)
 - 24 hour contact details.