

Submission  
No 28

## INQUIRY INTO DEVELOPMENT OF THE TRANSPORT ORIENTED DEVELOPMENT PROGRAM

**Organisation:** Albury City Council

**Date Received:** 14 March 2024

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Thank you for the opportunity to make a submission to the *Inquiry into Development of the Transport Oriented Development Program*

While AlburyCity is not located in an area subject to the Transport Oriented Development Program we note the terms of reference for the inquiry includes:

*o) the impacts of the proposed Diverse and Well-Located Homes process and program*

In the Albury this relates to the proposed changes regarding allowable developments in areas zoned R2 across the State.

As such please consider our submission attached, which was also previously submitted to the Department of Planning, Housing and Infrastructure in response to their public exhibition of *Explanation of Intended Effect (EIE): Changes to create low-and mid-rise housing.*

Please do not hesitate to contact me if you have any queries in relation to our submission.

Regards

**David Christy**

Service Leader City Development

[alburycity.nsw.gov.au](http://alburycity.nsw.gov.au)



AlburyCity acknowledges the Wiradjuri people as the traditional custodians of the land in which we live and work and we pay our respects to Elders past, present and future for they hold the memories, culture, tradition and hopes of Aboriginal and Torres Strait Islander people that contribute to our community.

## NSW Department of Planning, Industry and Environment

Submitted via NSW Planning Portal

20 February 2024

### AlburyCity Submission – Response to EIE: Changes to create low-and mid-rise housing

#### Overview

AlburyCity welcomes the opportunity to provide feedback on the *Explanation of Intended Effect (EIE): Changes to create low-and mid-rise housing*. While we support the delivery of more diverse dwelling types including low- and mid- rise housing, we object to the blanket changes applying to all R2 zones across NSW as outlined by our submission below.

#### Submission

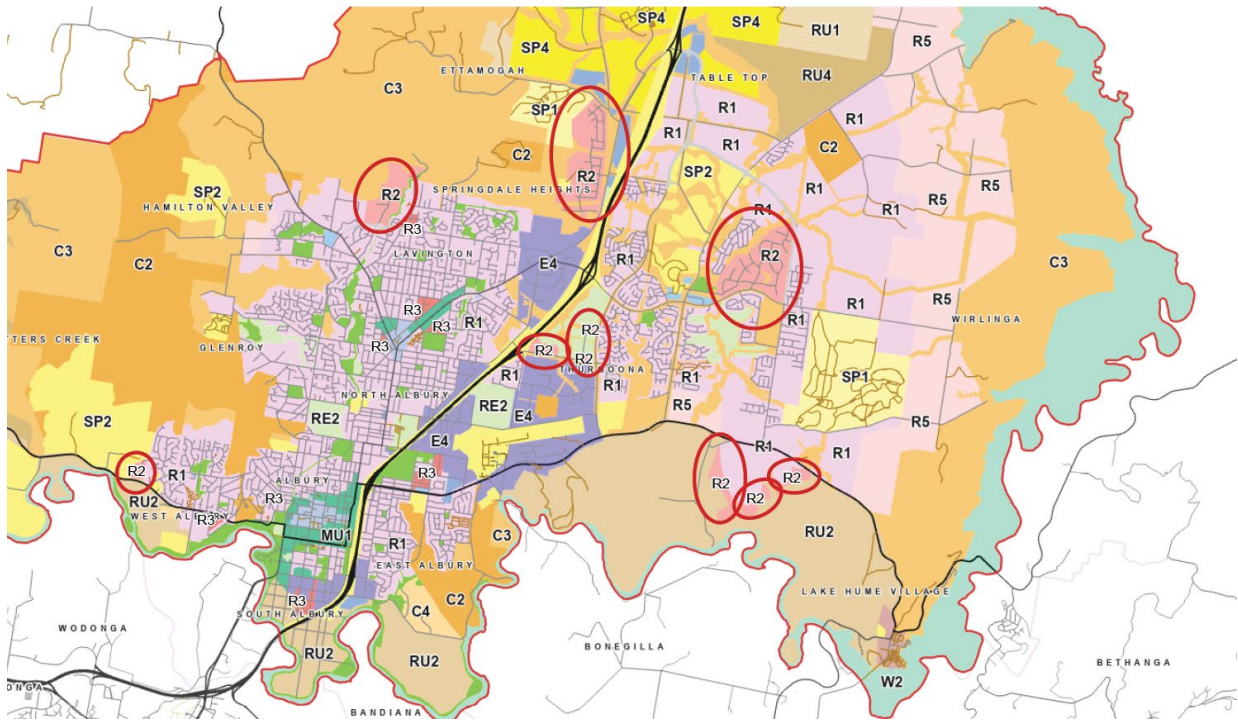
As a major regional city in NSW, we appreciate this opportunity for our feedback to be considered. Albury is not part of the Six Cities Region or the proposed transport hubs, so our submission focuses solely on the proposal to *“Allow dual occupancies (two dwellings on the same lot) in all R2 low density residential zones across NSW.”*

The importance of increasing housing supply, in particular, more diverse housing typologies, is broadly supported by AlburyCity (in line with our endorsed LSPS (2020) and Local Housing Strategy (2023)). We are committed to the delivery of a diverse housing stock to meet the needs of our community, both now and into the future. However, we object to the blanket changes applying to all R2 zones across NSW that do not take into account contextual differences of each region or place, nor does it consider local strategic planning directions.

Within the AlburyLGA, R2 Low Density Residential zones are generally located towards the fringe of our urban area and typically comprise large lots with detached housing surrounded by large gardens. Minimum Lot Sizes (MLS) of the R2 zones in the AlburyLGA are either 1,500m<sup>2</sup>, 2,500m<sup>2</sup> or 4,000m<sup>2</sup>. A blanket change to allow detached dual occupancy dwellings has the potential to significantly impact the established local character of these areas.

We also note that R2 zones in Albury are located in outer urban areas with no or very limited public transport (refer map below). This does not align with the stated overall EIE intent *“to enable more diverse, well-designed, low-rise and mid-rise housing near established town centres and in areas where there is good public transport.”*

In Albury, the vast majority of dual occupancy developments are detached dual occupancies. The EIE states *“dual occupancies... have no more impact than a freestanding house”*. This really only relates to attached dual occupancies and emphasises the Sydney/metro focus of this policy and limited consideration to regional contexts.



Map highlighting R2 zones in the Albury LGA

We also note our adopted Local Housing Strategy (2023) demonstrates significant development capacity within existing R1, R3 and MU1 zones to support further low and medium density housing across AlburyCity. For example, there is approximately 1,400ha of undeveloped R1 zoned land in the Thurgoona Wirlinga growth area (in addition to significant infill opportunities). Consultation with development industry as part of the Housing Strategy indicated a focus on enabling infrastructure and incentives would have greater impact on increasing housing supply and diversity than adjustments to planning controls, which are generally considered to be reasonably flexible and can accommodate diverse housing typologies where appropriate.

While we appreciate efficiencies of state-wide led planning changes, these need to be nuanced for different regions to account for local context and provide opportunities for Council's to opt-in/out of proposed planning changes that impact our places and communities.

Once again, thank you for the opportunity to respond. Should you have any queries regarding our submission, do not hesitate to contact me on

Regards,

David Christy  
**Service Leader City Development**  
**Albury City Council**