



BRAIDWOOD COMMUNITY ASSOCIATION

PO Box 199, Braidwood. NSW 2622

Submission on QPRC Affordable Housing Strategy

Summary

Recommendation 1: The BCA recommends that Council actively support and encourage opportunities for more diversified housing within existing residential zones in Braidwood, including allowing multi dwelling housing in R2 zones, and modifying site density constraints to encourage building of smaller lower cost dwellings.

Recommendation 2: The BCA encourages Council to investigate opportunities to permit and encourage infill development (eg dual occupancies, secondary dwellings and seniors housing) within the R2 zone in Braidwood.

Recommendation 3: The BCA recommends that Council urgently advocate for a commitment to maintain existing social housing in Braidwood, and to increase the supply to meet local community needs.

Recommendation 4: The BCA encourages Council to enter into discussions with the NSW Land and Housing Corporation with regard to increasing the supply of social housing, including crisis, short-term and transitional housing within the QPRC LGA as a matter of urgency.

Recommendation 5: The BCA recommends that planning controls for future Greenfield sites around Braidwood mandate the building of diverse housing types, including affordable and lower cost housing types.

Recommendation 6: The BCA requests that heritage constraints on development in and around Braidwood are acknowledged and considered in the Queanbeyan-Palerang Affordable Housing Strategy

Recommendation 7: The BCA encourages Council to further investigate the proposal to create affordable seniors' and/or key worker housing on Council land at the current Council Works Depot in Ryrie St.

The BCA welcomes this opportunity to comment on the Draft Queanbeyan-Palerang Affordable Housing Strategy, prepared by Judith Stubbs & Associates (JSA Report). We commend the authors of the report for their detailed study and reporting of the current housing situation in our LGA.

The extensive demographic and other information contained in the report from JSA is very valuable, though we note that much of it dates from 2016. Updated information would make the report even more valuable.

The report and associated documents confirm anecdotal and other evidence that there is a critical shortage of affordable housing in the QPRC LGA. The BCA recognises that this is a State-wide issue and is not restricted to our region. The BCA recognises that Local Government alone cannot solve this problem. All levels of government are responsible for finding solutions.

Social and Economic Impacts on the Braidwood Community

The JSA Report makes it clear that the lack of affordable housing is not just an individual problem. It impacts local economies via labour shortages, it disrupts social cohesion, reduces engagement with community activities and contributes to a lack of supply of essential key workers.

This is summarised in the JSA Report **S1.3 - Why is Affordable Housing Important?**

“Affordably priced housing is thus an important form of community infrastructure that supports community well-being and social and economic sustainability, including a diverse labour market and economy, and strong and inclusive communities”.(P4)

In small rural communities, the socio-economic impacts of a shortage of affordable housing are particularly significant. There is often a fragile demographic balance in these communities between the active workforce and other residents. If that balance is disrupted community well-being and social and economic sustainability are threatened.

Braidwood is unique in the QPRC LGA. We are a small rural town, located an hour from the urban centre of the LGA. The State Heritage Listing of ‘Braidwood and its Setting’ has specific impacts on current and future residential development in and around the town. This is barely acknowledged in the JSA report.

The majority of the report is understandably focused on Queanbeyan, where the greatest number of people at risk of homelessness, or in need of low-cost housing reside. Finding the specific information and recommendations for Braidwood is a very time-consuming task, in a report of this length.

The housing situation in Braidwood in 2023

As the JSA Report states, Braidwood and District has experienced a “perfect storm” of outside impacts on the local housing market. After many years of slow population growth, with fairly stable local population demographics, our town and region have experienced significant changes, causing a sudden increase in population.

1. Since 2018 we have seen the opening of two major new businesses. These are the Dargues Gold Mine at Majors Creek, and the Mona Farm wedding venue.

While these businesses have brought new opportunities to the local economy, they have also been disruptive. They have impacted the local labour market by creating new jobs for local workers, especially those who normally provide services for the local community. Skilled local tradespeople have been offered higher paid work at the mine, and of course they take that opportunity.

Employment opportunities at Mona Farm have impacted on local café businesses, who compete for local hospitality workers. These main street businesses are essential to the local and regional tourism industry. People visiting Braidwood are always looking for coffee and food. If our cafes can't open due to lack of staff, the impact is much wider than just a day's lost income for one business, as this affects the reputation of the town as a tourist destination.

Employees in both these new businesses have taken up rental accommodation in the town and district, and some have bought local properties. Availability of local rental accommodation has been affected by the take-up of lucrative short-term accommodation by Mona Farm guests.

2. Added to this is the impact of people moving from cities to rural areas as part of the "tree-change" movement. This was already happening before Covid, but every local real estate agent will confirm that Covid has exacerbated that trend.

3. The development of the Summerfield retirement village has added to the population in the over 55 age group. This has increased the demand for some services eg medical services.

All of these factors have contributed to a significant rise in property prices and rents in the Braidwood District, and a critical shortage of accommodation. While some property owners have benefitted, the downside is that many long-term local residents cannot afford rents in Braidwood, and can no longer afford the prices of local real estate. People on low to medium incomes are being priced out of the opportunity to live in Braidwood. That has immediate impacts on the local community and on the long-term social and economic cohesion that has held this community together.

Other Contributing Factors

1. Lack of Housing Diversity

The JSA Report has identified that "A much lower than average rate of increase in housing diversity in the LGA is also contributing to constrained supply. This includes small lot housing, and smaller (studio and one bedroom) apartments, boarding houses and the like which are major contributors to the supply of private rental accommodation. This lack of diversity is due to apparent planning impediments and economic factors". (p5).

Housing in Braidwood is particularly lacking in diversity. 88% of occupied dwellings are separate houses. Other structures are 'semi-detached, row, terrace, townhouse etc " (8%,) and "other dwelling" (2%) (Table 3.1, Background Paper p47.)

Infill development is slowly taking place within Braidwood's town limits, but due to planning constraints, the need for more diverse housing types is not being met. There is a critical need for smaller dwellings for low to moderate income earners, including key workers providing essential services. There are very few smaller strata dwellings suitable for older residents or younger single residents.

There is a lack of dedicated, affordable seniors' housing. Many homes on large town blocks are occupied by seniors, either couples or those living alone, because there are no alternatives. Aged Care providers have identified an unmet need for aged care workers to help senior residents remain at home. These homes could be made available to families if the senior residents had somewhere else to go. The "new" residential area at Braidwood Ridge has repeated this pattern of free-standing homes on large blocks (min 850 sq m). There has been no forward planning to cater for predictable changes in population demographics.

2. Impact of Planning Controls in Braidwood

Because of the predominance of detached housing in Braidwood, and the existing planning controls, the housing needs of single person households, couples without children, key workers such as teachers, hospital staff, ambulance officers etc, and transient residents are not being met. Changing demographics mean that 35% of Braidwood's residents live alone, but the R2 zoning (Low Density Residential) in almost all of the town prevents the development of multi dwelling housing. There are a few examples of these scattered throughout the R2 zone, and they are barely noticeable. They seem to be survivors of earlier planning regimes.

R1 General Residential Zone. There are only 2 small areas zoned R1 within the town of Braidwood. This zone permits multi-dwelling housing and residential flat buildings with consent. The JSA report analysed one of these sites at 35a Ryrie St. This site was for sale several years ago, and the BCA suggested that Council should buy the property, as it adjoins the Council works depot. The suggestion was declined, and the land is now privately owned. The other R1 area is located in Coronation Ave, in the middle of R2 zoning. There is no obvious reason for this zoning.

R2 Low Density Residential Zones. Most of Braidwood town is zoned R2 Low Density Residential, with a minimum lot size of 850 sq m. Dual occupancies, group homes, secondary dwellings, semi-detached dwellings and seniors housing are permitted with consent. The BCA notes that the JSA report did not investigate these opportunities when analysing the Economics of Redevelopment (Appendix C, 3.3.3 p64-69).

The JSA Report notes that multi dwelling housing is likely to provide smaller lower cost dwellings in Braidwood, but notes that this is constrained by the lack of suitably zoned land, minimum lot size requirements and site density constraints. (Background report p156-157).

The report suggests that "Opportunities for multi-dwelling housing could be further enhanced by rezoning areas to the south and southwest of Braidwood from R2 to R1 and relaxation of height controls in these areas to at least 8.5 m, allowing two storey construction." (Background Paper Appendices, p 68). The report does not identify where these areas are.

The BCA would need more information before commenting on this suggestion, but would not support multi-storey residential flat buildings along roads leading out of town.

A better option could be retention of the R2 zoning of these areas, while making multi dwelling housing permissible in R2 zones, as suggested in the JSA Background Report, Section 7.2.5 (p149)

Recommendation 1: The BCA recommends that Council actively support and encourage opportunities for more diversified housing within existing residential zones in Braidwood, including allowing multi dwelling housing in R2 zones, and modifying site density constraints to encourage building of smaller lower cost dwellings.

Recommendation 2: The BCA encourages Council to investigate opportunities to permit and encourage infill development (eg dual occupancies, secondary dwellings and seniors housing) within the R2 zone in Braidwood.

3. Limited supply of Social Housing. The JSA report has identified 5 properties in Braidwood that are in public housing ownership. This number is far fewer than in the past. Public housing in Braidwood has traditionally been occupied by long-term local residents. It appears that the NSW State Govt is intentionally reducing the supply of public housing, selling off properties rather than maintaining them. It seems unlikely that this will change while State Government policies require access to public transport and other services for social housing developments. Public transport does not exist in Braidwood.

Recommendation 3: The BCA recommends that Council urgently advocate for a commitment to at least maintain existing social housing in Braidwood, and to increase the supply to meet local community needs.

4. Lack of dedicated crisis, short-term and transitional accommodation for the increasing number of people at risk of homelessness, including older single people, sole parent families, those leaving family violence and people with a disability.

The BCA supports strategies to increase the supply of crisis, short-term, temporary and transitional housing, but notes that Braidwood has limited capacity to provide or manage this type of housing. It is likely that we will continue to rely mainly on services located in Queanbeyan or Goulburn to meet those needs.

Recommendation 4: The BCA encourages Council to enter into discussions with the NSW Land and Housing Corporation with regard to increasing the supply of social housing, including crisis, short-term and transitional housing within the QPRC LGA as a matter of urgency.

5. Long-term planning for new residential areas. The recently released Discussion Paper for the Braidwood Structure Plan is the first acknowledgement by any of our local Councils that Braidwood's future residential development needs a plan.

Demand for new housing has been evident for years, through the uptake of properties in the Braidwood Ridge development and the Summerfield Seniors Village. Current development is

constrained by existing planning instruments and encourages the building of more free-standing homes on relatively large lots.

Strategy 4 in the JSA Background Report suggests “increasing the supply of small lot housing and multi-dwelling housing in current and future release areas.” (p14)

Recommendation 5: The BCA recommends that planning controls for future Greenfield sites around Braidwood mandate the building of diverse housing types, including affordable and lower cost housing types.

See **Strategy 15(b)** for suggested requirements for Greenfield sites to include a proportion of lots for multi-dwelling housing, including smaller dwellings, and a proportion of houses on smaller lots. This implies creating a diversity of lot sizes and types of housing in new Greenfield sites.

The BCA supports this strategy in principle.

Strategy 10(j) suggests *“Providing opportunities for smaller dwellings on smaller lots such as substantially reducing minimum lot size in new release areas, particularly in Braidwood and Bungendore, zoning Greenfield sites as R1 rather than R2 to allow multi dwelling housing and/or making multi dwelling housing permissible within R2 zones, subject to minimum site frontage”*.

These two strategies seem to be in conflict.

The BCA does not support an overall reduction of minimum lot sizes in new release areas around Braidwood. Developments of large houses on small blocks are not compatible with the rural character of the town and region. A combination of R1 and R2 zones, and of different lot sizes would encourage a diversity of housing in Greenfield areas. The BCA expects that more detail re zoning and planning constraints in new developments will be discussed during consultation on the Braidwood Structure Plan.

6. Impact of State Heritage Listing and Braidwood DCP.

Development constraints in and around the town of Braidwood are unique, due to the listing of “Braidwood and its Setting” on the State Heritage Register. There is almost no mention of the Braidwood State Heritage Listing and the Braidwood DCP in the JSA report. The BCA sees this as a significant omission.

Recommendation 6: The BCA requests that heritage constraints on development in and around Braidwood are acknowledged and considered in the Queanbeyan-Palerang Affordable Housing Strategy.

The current 15 Year Review of the Heritage listing by GML for Heritage NSW will be relevant to this discussion.

Proposals for Affordable Housing in Braidwood in the JSA Report.

The JSA report notes that “the priority for the Strategy is very low and low renting income households.” (p14). The BCA understands that this is the greatest need across the LGA. It is unlikely that more public housing will be provided in Braidwood, so we will be relying on community housing providers, or the open market for provision of accommodation for very low or low-income earners. The open market is unlikely to provide this accommodation as long as housing supply does not meet the demand. Facilitative Intervention will be necessary to supply affordable accommodation for low-income earners.

Section 7.3 of the Background Report discusses Facilitative Intervention to provide more affordable housing. Some of the strategies discussed will not be applicable in Braidwood, but the BCA supports the first facilitative strategy. In discussing the need for diversity of housing options, the report identifies the need “to ensure that there are no impediments to the development of such dwellings through the planning system, and to actively seek to provide opportunities for their development in appropriate locations through appropriate zoning and controls.” (Background Report p152)

In Braidwood that could mean modifying current planning constraints on the development of studio and one-bedroom dwellings on existing lots in the R2 zone, and providing incentives through streamlining the DA process and removing or lowering some of the fees involved. Council could consider making multi dwelling housing permissible in R2 zones, and eliminating minimum site area requirements for multi dwelling housing, and reliance on FSR, as suggested in the JSA Background report, p149.

Direct Creation of Affordable Housing in Braidwood

2.5.1 Use of Council Land for Partnership Developments

The JSA Report contains two specific recommendations for direct creation of affordable housing in Braidwood under **Strategy 7** (p20-21). More detailed analysis is contained in Section 7.5.3 of the Background Report, and in Appendix B.

The two proposals for Braidwood are

- A caravan park with smaller manufactured /tiny homes.
- Affordable Seniors development on a site in Braidwood.

1. Caravan Park for Braidwood: There are 2 Council and publicly owned sites identified for potential caravan parks or MHE’s. The first is the Braidwood Race Course and Showground. The second is Lot 10 DP1111968, 42 Bombay Rd. 42 Bombay Rd is the Braidwood Common. The map on p29 of the Background Paper Appendices shows a site shaded in green which is part of the Braidwood Golf Course. It also shows the Braidwood Common outlined in green. It seems from the description that the site proposed is the Braidwood Common. This land is flood affected, has no services, and is located at a distance from the town. Council’s financial situation makes it unlikely that this proposal could be implemented in the short or medium term, unless a private developer was involved.

The BCA believes that for these reasons the location at 42 Bombay Rd is not a viable option for a caravan park.

The short-term caravan park at the Braidwood Showground serves a useful purpose for travellers but is subject to closure at short notice for events and other work. The BCA encourages Council to ensure that this facility is open as often as possible, for short-term stays.

Private development of land for a caravan park is another option. The Background Report is supportive of development of caravan parks on RU1 zoned land (p163).

The BCA acknowledges the need for a caravan park for tourism purposes, but has reservations about proposing this as a long-term housing solution. Caravans and tiny houses are not accessible to anyone with mobility issues, or age related and other disabilities. This is not a respectful or viable housing solution, except as a stop gap measure. We would not support this as a 'last resort' solution to the affordable housing crisis, while our governments continue to neglect the need for and responsibility to provide basic affordable housing.

The JSA report analysed the cost of accommodation in caravan parks in the LGA and found that they would not be affordable for low-income earners as long-term accommodation. (Background Report p69-70). They could be used for short-term accommodation if the resident had their own caravan or mobile home. These are all privately owned caravan parks with services provided.

The BCA notes that development of a caravan park on RU1 Primary Production land can have serious implications for landowners who are constrained by biosecurity requirements. When Dargues Gold Mine applied for a caravan park on RU1 land on Reservoir Lane several years ago, the biosecurity status of the neighbouring farmer was potentially under threat. Council would need to consider this in any proposal for development of a caravan park on RU1 land. Consultation with the local farming community is recommended before adopting this as a viable strategy.

2. Affordable Seniors Housing on Council Land. The need for Seniors housing is clear from the development of the Summerfield Village on Little River Road. This development is outside the town boundary, but was permitted under the Seniors Housing SEPP. Almost all this development is now sold. Affordable dedicated seniors' housing does not exist in Braidwood, despite the age profile showing that the median age in 2021 was much higher than the State average and much higher than the rest of the LGA. (Fig 2.2, Background Report, p 22).

The JSA report proposes the development of affordable seniors housing in Braidwood (Background Report p 176-177). The site identified is Council owned land in Rylie Street, currently used as the Council Works Depot. This proposal cannot be progressed until the Council Works Depot is relocated. This requires input of \$\$\$m which QPRC does not have.

The two options proposed for the Council owned site are:

1. A Seniors only development, or
2. A Villa development to include low income households.

The modelling for both developments is based on 38% sales and 62% rental. The proposal is for 26 two bedroom units with 26 parking spaces.

The BCA acknowledges and supports the need for both Seniors housing and rental housing for low-income workers in Braidwood. There is very little information in the proposal as to how this would work in practice, and the impact on the local housing market.

This is a very desirable location in the centre of the town. The BCA believes that the combination of properties for sale and for rent will not work in the medium to long term. All the properties will be highly sought after. Sales on the open market would result in high prices while the rental properties will have a long waiting list. Eventually market forces will prevail, and the entire development will be transferred to the open market. Once on the open market it is no longer affordable.

The BCA recommends that all properties in this proposed development be rental only, and managed by a Community Housing Provider. Another option could be a combination of a CHP managed section, with a rental-only section for key workers. Rents for key workers could be higher than those for seniors, and the development could include some smaller one-bedroom homes, rather than the 26 two-bedroom units in the JSA proposal.

Recommendation 7: The BCA encourages Council to further investigate the proposal to create affordable seniors' and/or key worker housing on Council land at the current Council Works Depot in Ryrie St.

The BCA notes that both of these proposals will have no immediate or medium-term impact on the critical shortage of affordable accommodation in Braidwood.

Other proposals to facilitate the creation of affordable housing in Braidwood

- 1. Repurposing the Braidwood Courthouse for accommodation for key workers on moderate incomes.**

An idea the BCA has proposed is the renovation of the Braidwood Courthouse to provide 4 apartments for key workers. (**See attached proposal**). The building is underutilised and must be a considerable financial drain on the State Govt. We have been told that this accommodation proposal isn't possible because of asbestos contamination in the building. This is not an insurmountable problem. Part of the building is currently used as the local police station. The proposal does not envisage changing the historic Braidwood Courtroom in any way. A public/private arrangement could be investigated as a way to utilise and repurpose this historic building for 21stC needs.

2. Other proposals in the JSA report that could be used in Braidwood

- Promoting the return of properties used for short-term rental to the long-term private rental market,
- Facilitating a pilot brokerage scheme in partnership with local CHP or NFP that matches owner occupiers in large under-occupied homes with people who are at risk of homelessness. (Section 2.3 Strategy 4),
- Council could further investigate the reason for what appears to be a relative undersupply of secondary dwellings in the private rental market, noting that this provides for an important source of lower cost, if not always affordable rental stock, and that zoning is quite liberal for this dwelling type. (Background Report p166)

There are other relevant proposals in the report including mandatory interventions but the BCA does not have the expertise to analyse all of them.

The BCA recognises that any built solution to the issues of affordable housing in the LGA will result in an increase in the DA approval load on Council. As the approval system is already stretched, a reasonable assumption would be that additional resources would be allocated to the DA approval process to deal with this increase and avoid further delays and blowout of approval times.

The BCA thanks QPRC for the opportunity to comment on the Judith Stubbs and Associates Queanbeyan-Palerang Affordable Housing Strategy.

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