

ITEM 07.24.122 AMENDED DRAFT LOCAL HOUSING STRATEGY - FOR RE-EXHIBITION

Meeting	Council	23 July 2024
Directorate	Environment & Planning	
Prepared by	Strategic Planner, Jasmine Oakes	
Reviewed by	Director Environment & Planning, Adam Cameron	
Attachments	A. Amended Draft Local Housing Strategy - For Re-Exhibition (Separate Cover) ⇒ B. Submissions Analysis (Separate Cover) ⇒ C. NSW Government Agency Submissions (Separate Cover) ⇒ D. Written Community Submissions (Separate Cover) ⇒ E. Community Proformas ⇒	

SUMMARY

This report seeks endorsement for the amended draft Local Housing Strategy (LHS) (**Attachment A**) to be re-exhibited to allow the community the opportunity to review changes made in response to submissions, prior to adopting a final LHS.

This report details the recommended changes to the draft LHS in response to community submissions and NSW Government agency recommendations. It provides a summary of the key concerns raised by the community regarding the draft LHS and draft Affordable Housing Policy (AHP) while the documents were on public exhibition from 27 October to 22 December 2023.

When adopted, the final LHS will recommend actions to implement priorities of the North Coast Regional Plan 2041 and Council's local planning and policy framework. It will assist Council to plan for housing based on the four housing pillars: supply, diversity, affordability and resilience. It aims to encourage appropriate infill development within our existing centres to provide diverse housing types close to services. It also identifies land suitable for greenfield development away from areas prone to natural hazards or land with high environmental and agricultural value to meet the housing needs of our community over the next 20 years.

There are no proposed changes to the draft AHP in response to submissions. Consequently, there is no requirement to re-exhibit the AHP. This will be submitted to Council for consideration for adoption along with the final LHS.

OFFICER RECOMMENDATION

That Council:

1. endorse the amended draft Local Housing Strategy (**Attachment A**) to be placed on public exhibition for a minimum six (6) weeks, in accordance with Council's Community Participation Plan;
2. note the Officer comments and the recommended changes to the draft Local Housing Strategy in response to community and agency submissions (**Attachment B**);
3. note that during the exhibition period of the draft Local Housing Strategy:
 - a. seven (7) submissions were received from NSW Government Agencies and one (1) submission was received from a non-government organisation (**Attachment C**);
 - b. 873 community submissions were received from the community during the public exhibition period of the draft Local Housing Strategy:
 - i. 370 written submissions (**Attachment D**)
 - ii. 503 proformas (example of each at **Attachment E**); and
4. note that all submissions received and recommended changes to the amended draft Local Housing Strategy will be reported back to Council for endorsement following the re-exhibition period.

COUNCIL RESOLUTION - 07.24.122

Toms/Tiley

That Council:

- 1. place the amended draft Local Housing Strategy (Attachment A) on public exhibition for a minimum six (6) weeks, in accordance with Council's Community Participation Plan;**
- 2. include 4 River Street Palmers Island in the Draft Housing Strategy for exhibition**
- 3. note the Officer comments and the recommended changes to the draft Local Housing Strategy in response to community and agency submissions (Attachment B);**
- 4. note that during the exhibition period of the draft Local Housing Strategy:**
 - a. seven (7) submissions were received from NSW Government Agencies and one (1) submission was received from a non-government organisation (Attachment C);**
 - b. 873 community submissions were received from the community during the public exhibition period of the draft Local Housing Strategy:**
 - i. 370 written submissions (Attachment D)**
 - ii. 503 proformas (example of each at Attachment E); and**
- 5. note that all submissions received and recommended changes to the amended draft Local Housing Strategy will be reported back to Council for endorsement following the re-exhibition period.**

Voting recorded as follows

For: Clancy, Day, Johnstone, Novak, Pickering, Smith, Tiley, Toms, Whaites

Against: Nil

CARRIED

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SUMMARY

This report seeks endorsement for the amended draft Local Housing Strategy (LHS) (**Attachment A**) to be re-exhibited to allow the community the opportunity to review changes made in response to submissions, prior to adopting a final LHS.

This report details the recommended changes to the draft LHS in response to community submissions and NSW Government agency recommendations. It provides a summary of the key concerns raised by the community regarding the draft LHS and draft Affordable Housing Policy (AHP) while the documents were on public exhibition from 27 October to 22 December 2023.

When adopted, the final LHS will recommend actions to implement priorities of the North Coast Regional Plan 2041 and Council's local planning and policy framework. It will assist Council to plan for housing based on the four housing pillars: supply, diversity, affordability and resilience. It aims to encourage appropriate infill development within our existing centres to provide diverse housing types close to services. It also identifies land suitable for greenfield development away from areas prone to natural hazards or land with high environmental and agricultural value to meet the housing needs of our community over the next 20 years.

There are no proposed changes to the draft AHP in response to submissions. Consequently, there is no requirement to re-exhibit the AHP. This will be submitted to Council for consideration for adoption along with the final LHS.

OFFICER RECOMMENDATION

That Council:

1. endorse the amended draft Local Housing Strategy (**Attachment A**) to be placed on public exhibition for a minimum six (6) weeks, in accordance with Council's Community Participation Plan;
2. note the Officer comments and the recommended changes to the draft Local Housing Strategy in response to community and agency submissions (**Attachment B**);
3. note that during the exhibition period of the draft Local Housing Strategy:
 - a. seven (7) submissions were received from NSW Government Agencies and one (1) submission was received from a non-government organisation (**Attachment C**);
 - b. 873 community submissions were received from the community during the public exhibition period of the draft Local Housing Strategy:
 - i. 370 written submissions (**Attachment D**)
 - ii. 503 proformas (example of each at **Attachment E**); and
4. note that all submissions received and recommended changes to the amended draft Local Housing Strategy will be reported back to Council for endorsement following the re-exhibition period.

LINKAGE TO OUR COMMUNITY PLAN

Theme Leadership

Objective We will have a strong, accountable and representative Government

KEY ISSUES

Submission assessment

The draft Local Housing Strategy (LHS) and the draft Affordable Housing Policy (AHP) was placed on exhibition from Friday 27 October to Friday 22 December 2023. Council received seven (7) NSW Government agency submissions and one (1) non-government organisation submission (**Attachment C**); 873 community submissions, including 370 written submissions (**Attachment D**); and 503 signed proformas (examples of the four (4) different proformas, two (2) Yamba based, and two (2) Iluka based signed proformas, at **Attachment E**). Further details regarding the public exhibition, community engagement activities and submissions received are discussed in the consultation section of this report.

Section 1 of **Attachment B** provides responses and proposed amendments to the draft LHS in response to government agencies and non-government organisations recommendations.

Section 2 of **Attachment B** provides a detailed submissions analysis that addresses the key issues raised by the community and proposed changes to the amended draft LHS. The key issues and proposed amendments to the draft LHS are summarised below.

Summary of community submissions

The majority of the submissions received from the community were from people that either reside in Iluka and Yamba, people who own holiday houses or have spent years holidaying in these localities. Most submitters expressed support for the overall housing vision for the Clarence Valley to provide diverse, affordable, resilient housing that accommodates differing demographics of our community at all stages of life. Much of the feedback related to the proposed planning interventions contained within Annexure 4 of the draft LHS, being concepts for possible future rezoning areas, which would be subject to further investigation.

There was general support expressed for the planning intervention for Maclean given that the location of the proposed intervention has large lots, is located away from environmental constraints, is within easy access to services, the Maclean Public Hospital and the Pacific Motorway. There was also support and justification provided by a planning consultant on behalf of the owner for the planning intervention at Boundary Road, Gulmarrad. The submissions did not object to proposed planning interventions for Grafton or South Grafton.

There were however strong objections for the proposed planning interventions for Iluka, Yamba Hill and Yamba CBD and the proposal to prohibit “dwelling houses” (single detached dwellings) in the R3 Medium Density Residential zone. Submissions included general opposition to development on floodplains.

The key concerns include:

- potential impacts to the existing local character and amenity;
- capacity of road, sewer, water, and other infrastructure to meet increased density;
- lack of adequate health, medical and other services to meet increased population;
- flood and stormwater impacts to existing properties;
- negative socio-economic impacts;
- impacts of increased opportunity for short-term-rental-accommodation;
- privacy and overshadowing impacts with increased height of buildings;
- environmental and ecological impacts; and
- accumulated emergency evacuation management requirements.

There have been alternative suggestions submitted by members of the Iluka community around small-scale increases to housing diversity with more secondary dwellings and dual occupancies, noting these outcomes are already facilitated under existing planning controls. Feedback included reducing barriers to these types of development and incentivising the return of short-term rental accommodation (STRA) to the permanent rental market. These themes are captured in the draft LHS, noting that Council has recently implemented the Accelerated DA process (for simple, compliant residential development) and that the NSW Government are currently reviewing STRA rules to improve long term rental supply.

The proformas and objections about the planning interventions for Yamba generally opposed any changes to the planning controls or any increase in housing density. The majority of submissions did not suggest alternate approaches to provide housing solutions to meet the future housing needs of the Yamba

community, other than recommending that future housing be delivered in Grafton, Maclean, Lawrence or Glenreagh.

It was evident that many submitters misunderstood the overall intended purpose of the draft LHS being exhibited with the AHP, which was further compounded by misinformation disseminated within the Iluka and Yamba communities. Many submitters believed that the existing housing within the intervention areas were identified to be demolished and redevelopment to deliver affordable and social housing for low-income earners. While some supported delivery of affordable housing, the majority objected that that these locations were inappropriate for affordable housing and would undermine the social fabric of the area and reduce housing prices. Conversely other submitters objected to the perceived redevelopment of the existing houses to deliver 12m high multi level luxury apartments which would raise median housing prices and force rates and rents even higher which would force the financially vulnerable members of the community out of these coastal areas.

The proposed planning interventions are the key mechanisms within Council's control to deliver on the North Coast Regional Plan 2041 requirement for local housing strategies to have a clear road map demonstrating how they intend to deliver 40% of new dwellings by 2036 in the form of multi dwelling / small lot (less than 400m² housing). The proposed interventions may enable a greater variety of housing types to be developed and may improve housing supply, which clearly provides community benefit and is in the public interest. Ownership and the housing market will still determine whether these areas are further developed should the interventions be progress through the planning proposal (being an amendment to the *Clarence Valley Local Environmental Plan 2011* [the LEP] process and acceptable development applications are made.

In addition, prior to interventions being implemented, character statements will be developed in consultation with the community to determine the desired future character of the area to inform any planning control changes. Planning proposals will also require appropriate studies and assessment to ensure any proposed rezonings or building height increases address and consider potential impacts to the existing community, development, and the environment and provide adequate justification and consistency with relevant state, regional and local planning policy. It is also legislative requirement to publicly exhibit any planning proposal that propose to amend the LEP, to allow the community the opportunity to provide feedback on the proposal.

Proposed additions to the draft LHS via submissions

4 River Road, Palmers Island

One submission was received on behalf of the owner of land at 4 River Road Palmers Island (3.185ha) to rezone land from RU2 Rural Landscape to R5 Large Lot Residential to allow the subdivision of six (6) lots with a minimum 4000m² lot size. This land is highly constrained being flood prone and mapped riverbank erosion area. Preliminary discussions were held with staff from the previous Department of Planning and Environment on 30 October 2023 who suggested that the proposal would be very unlikely to be supported at Gateway determination due to lack of strategic merit for the proposal, non-compliance with the North Coast Regional Plan 2041, and substantial concerns around flooding and riverbank erosion risk.

Due to the potential flood and riverbank erosion risks it is recommended that this site not be identified for future R5 Large Lot Rural Residential in the draft LHS.

925 Rushforth Road, Elland

One submission was received on behalf of the owner of land at 925 Rushforth Road Elland to rezone RU2 Rural Landscape to R5 Large Lot Residential. The site area consists of 436ha of relatively unconstrained grazing land approximately 9km from South Grafton. The justification behind the submission was that the draft LHS identified that the existing planning capacity of the undeveloped R5 land may not come to market due to on-site constraints, potentially leading to a shortfall in the supply of R5 lots being developed in the lifetime of the LHS.

The draft LHS identifies adequate unconstrained urban release areas and residential zoned land to accommodate the projected population increase of the local government area (LGA) to 2041. Consequently, there is no observed current planning need to rezone this site for R5 Large Lot Residential. Therefore, the site is not recommended to be included in the proposed intervention areas in draft LHS.

Council staff will continue conversations with the proponent based around whether there is evidence-based planning need for some type of appropriate future development on the subject site.

James Creek

A landholder located at James Creek attended the industry-based consultation session held in Maclean on 22 November 2023, expressing some concern that his land, which is identified as an urban investigation area in the North Coast Regional Plan 2041, was not expressly included for future intervention in the exhibited draft LHS. Further discussions were held between the landowner and Council regarding the planning history and its inclusion as an urban release area in the Maclean Urban Catchment Lower Growth Management Strategy 2011 as a medium-term option, and subsequent Council resolution (item 14.006/11) on 16 August 2011, (2) “ That the strategy also include Lot 1 DP 1025045 with no residential lots to be released on Lot 1 DP 1025045 for a period of 5 years.”

Advice was sought from the Department of Planning, Housing and Infrastructure (DPHI) who recommended that the investigation area be included in the amended draft LHS given Council’s existing policy position supporting future rezoning. DPHI also recommended that should the site be included, that the amended draft LHS include timing, staging, and further investigations that are required to progress the investigation area to an urban release area.

Recommended changes to the draft Local Housing Strategy

Removal of prohibiting ‘dwelling houses’ in R3 Medium Density Residential zone

The draft LHS prohibited ‘dwelling houses’ in R3 Medium Density Residential zones in the LGA with the intention to improve the provision of dwelling diversity and higher densities, which typically result in more affordable housing. This attracted significant and strong objection from many of the submitters on the grounds that many R3 landowners that have not yet developed their land would then be required to only develop the land with other higher density dwelling types permitted in the R3 zone; it removes the choice from the owner to construct a stand alone dwelling which was permitted when the land was purchased and may result in an over representation of multi-dwelling houses.

Consequently, the amended draft LHS action about “prohibiting ‘dwelling houses’ in R3 Medium Density Residential zone” has been removed.

Planning Intervention – Iluka

The Iluka intervention proposed an extension of the existing R3 Medium Density Residential zone and a proposed height of building increase from 9m to 12m (**Figure 1**) to allow development of a greater diversity of housing types and sizes (i.e. attached dwellings, multi dwelling housing, residential flat buildings that vary in size and number of bedrooms). These are prohibited in the existing R2 Low Density Residential zone, which only permits single detached dwellings, dual occupancies, and secondary dwellings.



Figure 1: Planning intervention area – Iluka

Proposed changes

- This planning intervention will not propose to change height of buildings from the current limit of 9m. The concept to increase building heights to 12m has been removed in response to the concerns regarding the potential impacts to local character and the existing developments. Reasonable redevelopment up to

three (3) storeys can occur within the current LEP 9m height limit, which can still allow for housing diversity and choice to be delivered.

- The proposal has been amended to include consideration of both R1 General Residential and R3 Medium Density Residential zones during the future detailed character statements, which will include further community consultation.
- The planning interventions have been updated with trigger points that require substantial development of existing zoned land (existing R3 Medium Density Residential land in Iluka); and the development of desired character statements to provide greater clarity on appropriate locations within the intervention area.
- The planning interventions have also been updated to require relevant investigations to inform and support a planning proposal which will address many of the key concerns.

Planning Intervention - Yamba Hill

The Yamba Hill intervention proposed an extension of the existing R3 Medium Density Residential zone and a proposed height of building increase from 9m to 12m (**Figure 2**) to allow development of a greater diversity of housing types and sizes (i.e. attached dwellings, multi dwelling housing, residential flat buildings that vary in size and number of bedrooms). These are prohibited in the existing R2 Low Density Residential zone, which only permits single detached dwellings, dual occupancies and secondary dwellings.



Figure 2: Planning intervention area – Yamba Hill

Proposed changes

- This planning intervention will not propose to change height of buildings from the current limit of 9m. The concept to increase building heights to 12m has been removed due to the concerns regarding the potential impacts to local character and the existing developments. Reasonable redevelopment up to three (3) storeys can occur within the current 9m height limit, which can still allow for housing diversity and choice to be delivered.
- The proposed planning proposal for a zoning change from R2 Low Density Residential zone to R3 Medium Density Residential zone will be progress in the short term to allow for greater housing diversity.
- The planning intervention has been updated with trigger points that require the development of a desired character statement to provide greater clarity how the zoning change will integrate into the local area and existing streetscapes.
- The planning interventions have also been updated to require relevant investigations to inform and support a planning proposal which will address many of the concerns raised.

Planning Intervention – Yamba CBD

The planning intervention for Yamba CBD proposed a height of building increase from 12m to 18m to enable greater flexibility to deliver an additional storey for commercial and /or residential shop-top housing, with capacity for increased off-street parking to the rear of commercial shop frontages.



Figure 3: Planning intervention area – Yamba CBD

Proposed changes

Due to the multiple concerns raised regarding how increasing height of buildings will impact on local character, the existing community and local businesses, it is proposed to remove this intervention from the amended draft LHS.

Reasonable redevelopment up to four (4) storeys can occur within the current 12m height limit, which still allows for housing diversity and choice to be delivered, such as shop-top housing and apartments within mixed use redevelopment. Retaining the building height limit at 12m will ensure better integration of future development with existing redeveloped sites in the Yamba CBD.

NSW Government Agency recommendations

The key amendments to the draft LHS in response to NSW Government Agencies include:

1. DPHI recommendation 9 - Addition of Action 1.5 *Collaborate with the NSW Reconstruction Authority to support housing delivery for flood impacted residents including land identified in the final Resilient Lands Strategy.*
2. DPHI recommendation 10 relating to an Affordable Housing Contributions Scheme viability assessment requirement – Action 3.2 updated *“To allow Council to impose conditions of consent requiring contributions towards affordable housing, **undertake a viability assessment for an Affordable Housing Contributions Scheme (AHCS), and if deemed feasible, progress the preparation of a local or regional AHCS and update Clarence Valley LEP to authorise the scheme.**”*
3. Biodiversity Conservation and Science Division of DPHI recommendation 2 – Addition of Action 4.6 *“Review land use zones (and other relevant planning controls) for remote villages; areas that have historic village type subdivision plans and undeveloped rural-residential areas. Consider environmental and other constraints, existing and neighbouring land uses, and suitability for residential development, and apply suitable planning controls (where deemed appropriate).”*
4. Annexure 4 Planning Interventions Inclusions:
 - a. Current and proposed planning controls,
 - b. Trigger points to be met prior to intervention implementation,
 - c. Key issues and constraints related to each intervention area,
 - d. Investigation requirements to inform and support a planning proposal for each intervention area,
 - e. Masterplan requirements identifying appropriate buffers to rural areas, for relevant intervention areas.
5. Annexure 4 updated to state that all planning proposals will be required to provide adequate justification and consistency with relevant state, regional and local planning provisions including relevant State Environmental Planning Policies, Local Planning Directions and North Coast Regional Plan 2041.

6. James Creek "Investigation Area" added to the Annexure 4 Planning Interventions in response to multiple agency recommendations.

A detailed submissions analysis is included in Section 1 of **Attachment B**.

Affordable Housing Changes

Action 3.4 "*Investigate opportunities for affordable housing on Council-owned land delivered through public private partnerships using a competitive tender process*" that recommends Council partner with Community Housing Providers was made more specific in response to internal feedback, and now identifies four sites of Council owned land that warrant further investigation:

- Grafton Library carpark (airspace above)
- Car park between Victoria and Fitzroy Streets in the Grafton CBD (airspace above)
- Wooli Street, Yamba - Library and Community Hall
- Vacant residential land at Coutts Crossing.

BACKGROUND

The Clarence Valley Settlement Strategy 1999 (and The Maclean Urban Catchment Lower Growth Management Strategy 2011) are Council's current urban and rural land release strategies prepared under the requirements of the then North Coast Regional Environmental Plan (and Mid North Coast Regional Strategy). These strategies will be superseded on adoption of the amended draft LHS.

NSW Councils are required to prepare local housing strategies in accordance with (the previous) Department of Planning and Environment's Local Housing Strategy Guideline 2018 and the North Coast Settlement Planning Guidelines 2019 and are required to implement the North Coast Regional Plan 2041 (NCRP 2041).

The NCRP 2041 is the NSW Department of Planning, Housing and Infrastructure's 20-year strategic land use planning framework for the North Coast region aiming to protect and enhance the region's assets and plan for a sustainable future and plan for the strong population growth predicted for the region. One of the key deliverables for housing in the region is that Council's local housing strategies are to have a clear road map outlining and demonstrating how to deliver 40% of new dwellings by 2036 in the form of multi dwelling / small lot (less than 400m²) housing.

Council was successful in obtaining a \$150,000 grant funding from the NSW Government's Regional Housing Strategic Planning Fund to develop an up-to-date local housing strategy aimed to enable and accelerate the delivery of housing supply, affordability, diversity and resilience. HillPDA and Meccone consultants were secured to develop the draft LHS, draft AHP and a Housing Prospectus.

The draft LHS was developed based on current legislation and planning policy (as detailed in Annexure 1 of **Attachment A**), an evidence base including detailed analysis of demographic data and trends, housing demand and supply (as detailed in Annexure 2 of **Attachment A**); and community and stakeholder consultation (as detailed in Annexure 3 of **Attachment A**). The key findings and a summary of the evidence detailed in the annexures is included in section 2 of the draft LHS. The key findings were also discussed in the Council report (Item 07.23.193).

Council at their meeting held on 24 October 2023 resolved, that Council:

1. endorse the draft Clarence Valley Local Housing Strategy (Attachment A) and draft Clarence Valley Affordable Housing Policy (Attachment B) for public exhibition and associated community consultation for a minimum six (6) weeks, in accordance with the Community Participation Plan;
2. delegate authority to the General Manager to make any minor amendments to the draft Strategy and draft Policy for public exhibition purposes prior to public exhibition; and
3. note that all submissions received and recommended changes to the draft Strategy and / or draft Affordable Housing Policy will be reported back to Council for endorsement following the exhibition period.

Planning assumptions for West Yamba Urban Release Area

The draft LHS has been prepared on the basis that the Urban Release Areas, inclusive of West Yamba, have planning capacity to deliver residential development to meet the housing needs of the community.

The Northern Regional Planning Panel recently refused a development application for Miles Street, West Yamba, which proposed a subdivision for approximately 350 residential lots. Whilst not final, this decision

places some preliminary uncertainty on the ability for West Yamba to provide housing in accordance with the planning assumptions of the draft LHS.

In the event that the West Yamba Urban Release Area cannot deliver planned housing supply to meet community need, the LHS would need to be updated. This may include new investigations around increasing density and building heights, and/or bringing forward planning interventions in other locations to provide diverse and affordable housing.

COUNCIL IMPLICATIONS

Budget/Financial

The draft and amended draft LHS and draft AHP have been developed by consultants HillPDA and Mecone. The project has been funded via a \$150,000 grant from the previous Department of Planning and Environment's, Regional Housing Strategic Planning Fund, Round 1. Project management has been delivered within the existing Strategic Planning team budget.

The public exhibition of the amended draft LHS will also be accommodated within the exiting recurrent Strategic Planning team budget with no financial implications for Council. The implementation of actions in the LHS once adopted, may have a wide range of budget implications, however the draft LHS does not commit Council to any specific budgetary direction. Any future activity associated with implementing the adopted LHS will be subject to the Council's Operational Plan considerations and prioritisation, including seeking further endorsement by Council.

The amended draft LHS also aims to provide leverage and support for State and Federal Government grant funding and potential partnership with Community Housing Providers to deliver diverse, affordable, resilient housing in the Clarence Valley over the next 20 years.

Asset Management

There are no direct implications for the management of Council owned assets with a decision to support exhibition of the amended draft LHS.

Policy and Regulation

Environmental Planning and Assessment Act 1979

Environmental Planning and Assessment Regulation 2021

North Coast Regional Plan 2041

Clarence Valley Local Strategic Planning Statement

Community Participation Plan

Consultation

Overall, the engagement with the community has been extensive and is considered to be well beyond minimum standards, noting significant staff time and resourcing expended during the LHS preparation and exhibition period.

Community Housing Survey to inform the draft LHS

A community survey was made available on Council's Clarence Conversations "Have your say" webpage from 2 June to 10 July 2023 to gain an understanding on housing preference in the Clarence Valley, to inform the draft LHS. A total of 80 responses were received. The key findings of the survey are discussed in the amended draft LHS – "Annexure 3 stakeholder engagement", of **Attachment A**.

Notification of the community housing survey was made via Council's Noticeboard Enews and social media platforms with weekly recurrent post beginning on Friday 2 June 2023.

Consultation and engagement activities undertaken to inform the draft LHS

Extensive consultation and engagement sessions occurred with Council staff and various stakeholders including government agencies, non-government organisations, and the planning and development industry to inform the development of the draft LHS. The following engagement sessions were held:

- Council issues and options workshop – 19 June 2023
- Council visioning workshop – 26 July 2023
- Industry stakeholder consultation sessions
 - Grafton – 19 June 2023 (15 attendees)
 - Maclean – 20 June 2023 (12 attendees)

- NSW Government agency consultation sessions – 18 July 2023
- Affordable and social housing organisation and agency consultation – 20 July 2023.

Further details regarding these consultation sessions were discussed in Council report (Item 07.23.193). The key findings are discussed in the amended draft LHS “Annexure 4 stakeholder engagement”, of **Attachment A**.

Public exhibition and notification of the draft LHS and draft AHP

The draft LHS and draft AHP was placed on public exhibition via Council’s On-exhibition webpage for six (6) weeks in accordance with Council’s Community Participation Plan and Council resolution (Item 07.23.193) from Friday 27 October 2023 until Monday 11 December 2023. Many submitters objected that the six (6) weeks exhibition period and notification of the draft LHS and community drop-in sessions was inadequate.

It should be noted, that the exhibition timeframe of 6 weeks for land use planning strategies is determined by Council’s Community Participation Plan, based on the Community Participation requirements of the *Environmental Planning and Assessment Act 1979* which specifies a required 6 weeks public exhibition for draft Strategies and Plans that cover ‘District’ and ‘Regional’ areas, and 28 days exhibition for draft ‘local strategic planning statements’ which generally cover a local government area. Council also extended the exhibition deadline from 11 December to 22 December 2023 to allow an additional 11 days (a total of 8 weeks) for submissions, in response to extension requests from the community.

The draft LHS and AHP was also referred to relevant NSW Government agencies and affordable housing organisations for review. Hard copies of the draft LHS were also available for inspection at Maclean and Grafton Council offices, and Grafton, Maclean, Yamba and Iluka Libraries.

Notification of the exhibition period of the draft documents was made via Council’s Noticeboard Enews and social media platforms with weekly posts beginning on Friday 27 October 2023.

The draft LHS was also notified in the Clarence Valley Independent Newspaper and media releases sent to external media organisations:

- Clarence Valley Independent Newspaper - Council’s Housing Strategy and Affordable Housing Policy – 15 November 2023.
- Seven Coffs Harbour News – story about shortages of affordable housing and inviting comment on Clarence Valley’s draft LHS – 7 November 2023
- Nine Coffs Harbour - story directly taken from CVC media release on LHS – 16 November 2023

Submissions received regarding the draft LHS and draft AHP

NSW Government Agency and non-government organisation submissions.

Seven (7) submissions were received from NSW Government Agencies and one (1) submission was received from non-government organisations:

- Department of Planning and Environment
- Department of Planning and Environment, Biodiversity Conservation Division (Biodiversity)
- Department of Climate Change, Energy, the Environment and Water (Coastal Hazards and Flooding)
- Department of Primary Industries (Agriculture)
- Department of Primary Industries (Fisheries)
- NSW State Emergency Services
- NSW Rural Fire Service
- Community Housing Industry Association NSW

The full NSW government agency and non-government organisations submissions are included as **Attachment C**.

Community Submissions

Of the 873 community submissions, 370 were written submissions received by Council’s On-exhibition website or email. These submissions have been included as **Attachment D**. In addition to the written submissions, 503 signed proformas were received objecting to the planning interventions for Yamba and Iluka.

- Iluka proforma 1 – 151 signed proformas
- Iluka proforma 2 – 155 signed proformas
- Yamba proforma 1 – 184 signed proformas
- Yamba proforma 2 – 13 signed proformas

An example of each of the four (4) proformas are included as **Attachment E**.

Community Drop in Sessions

Community Drop-in sessions were held during the public exhibition period with representatives from Council's Strategic Planning, Development Services and Water Cycle sections. These engagement sessions were held to provide an opportunity for community to speak directly with relevant staff to discuss the draft LHS and the proposed Annexure 4 Planning Interventions. The drop-in sessions were held at the following locations:

Venue	Date
Yamba Farmers Market	Wednesday 15 November - 7.00am – 11.00am
Yamba Wooli Street Hall (behind Library)	Wednesday 15 November - 2.30 – 4.30pm
Maclean Library	Friday 17 November – 10.00am – 12.30pm
Maclean Library	Friday 17 November – 1.30pm – 4.00pm
Grafton Library	Tuesday 21 November - 11am - 4pm
Iluka Bowls Club	Thursday 23 November – 10.00am – 1.00pm

Notifications were made via Council's On-exhibition webpage, Noticeboard Enews and Social media platforms beginning on Wednesday 8 November 2023 and notified in the Clarence Valley Independent on 15 November 2023.

Targeted consultation sessions

Targeted consultation sessions were held with stakeholders to discuss the main components of the draft LHS and provide an opportunity for these key stakeholders to speak with relevant staff and raise questions and / or provide further feedback on the draft LHS.

The following follow up consultation sessions were held:

- Industry stakeholder consultation sessions:
 - Grafton – 20 November 2023;
 - Maclean – 22 November 2023;
- Local environmental interest groups - 22 November 2023
- Local Aboriginal Land Councils – Grafton Library's Community Engagement Hub - 30 November 2023
- NSW Government agency consultation sessions – 4 December 2023; and
- Affordable and social housing organisation and agency consultation – 4 December 2023

A targeted consultation session was also requested from representatives of the Iluka community to discuss their concerns regarding the proposed planning intervention for Iluka directly with Council staff. This consultation session was held in Maclean on 8 April 2023.

These concerns are discussed in more detail in the submissions analysis at **Attachment B**.

Public exhibition of the amended draft LHS

It is recommended that the amended draft LHS be placed on public exhibition for six (6) weeks in accordance with Council's Community Participation Plan and to allow the community the opportunity to review the changes made to the draft LHS in response to both community and government agency submissions. It is proposed to place the amended draft on Council's On-exhibition webpage (should Council resolve to do so) from Friday 27 July 2024 to Monday 9 September 2024. Notification will be made via Council's Noticeboard Enews and social media platforms. An article will be placed in the Clarence Valley Independent Newspaper in the next available period following the Council meeting.

Legal and Risk Management

The amended draft LHS includes a wide range of broad policy objectives and future actions that do not pose a legal or other risk to Council.

Action 3.4 however identifies four (4) Council owned sites for investigation for potential partnerships to deliver affordable housing, which would occur subject to relevant requirements under the *Local Government Act 1993* and any other relevant legislation.

Climate Change

Impacts of climate change have been considered in the development of the amended draft LHS. New housing will need to be in locations that appropriately manage the known risk of natural hazards, such as flood, bushfire, sea level rise, or other extreme weather events. In addition, areas of high environmental and agricultural value, including heavily vegetated land and mapped important farmland were excluded from the capacity modelling to support biodiversity, ecological functions and our agricultural industry to provide resilience for our community, adaptability to climate change and economic viability into the future.