

GYDE

Eurobodalla Housing Supply Audit

Submitted to Department of Planning and Environment
on behalf of Gyde Consulting

1 November 2023

Acknowledgment of Country

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Gyde is committed to learning from Aboriginal and Torres Strait Islander people in the work we do across the country.



Towards Harmony by Aboriginal Artist Adam Laws

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Report Version: Final

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Executive Summary and Overall Findings

The Eurobodalla Housing Supply Audit has been completed in line with the steps outlined in the Draft Housing Supply Pipeline Audit: Technical Note published by the DPE in November 2022. The purpose of this audit is to calculate the capacity of land in the Eurobodalla local government area (LGA) to deliver future housing supply in the short, medium and long term.

The audit methodology was comprised of three main stages. To begin sites were identified through planning proposals, local structure plans and development applications. The identified sites were then analysed based on their environmental, infrastructure, planning and biodiversity status. Sites were allocated a tier according to the technical note classification.

The Department of Planning implied demand figures outline that Eurobodalla will require 6,219 dwellings from 2021-2041 resulting in an average of 310 dwellings per year to keep up with demand. From 2016-2021 the Eurobodalla LGA has approved on average 28 dwellings per year from 2016-2022, which falls 282 dwellings short of the DPE implied demand figures.

The audit has identified 16 greenfield sites within the Eurobodalla housing pipeline that have the capacity to provide 4,692 residential dwellings from 2023 until 2046. The resulting tiers of the 16 identified sites were:

- 2 sites in tier 1a that have the combined capacity for 529 dwellings
- 3 sites in tier 2a that have the combined capacity for 1,112 dwellings
- 10 sites in tier 2b that have the combined capacity for 2,956 dwellings
- 1 site in tier 4 that has the capacity for 95 dwellings

Further analysis outlines that Eurobodalla has a theoretical capacity based on the planning controls only for 27,905 infill dwellings across specific investigation areas and uplift sites.

This report talks to 2041 and 2046. These different timelines are due to the DPE implied dwelling projections ending in 2041 but this audit identifying sites that are projected to contribute dwellings until 2046.

It should also be noted that a significant aspect of this audit for Eurobodalla is based on the environmental constraints that have been identified through GIS analysis. Eurobodalla's main environmental constraint is bushfire prone land.

1. Introduction

Gyde Consulting Pty Ltd has been engaged by the Department of Planning and Environment to conduct a pilot housing supply pipeline audit for the Eurobodalla LGA. The aim of this audit is to provide clarity on the available information regarding housing capacity in the Eurobodalla LGA. This audit will outline the status of Eurobodalla's housing pipeline and key constraints or barriers holding back development of key sites within the LGA. It follows the methodology outlined in the Draft Housing Supply Pipeline Audit: Technical Note published by DPE in November 2022. The audit is being developed and tested with Gyde as a pilot to review the methodology and identify areas for improvement.

The capacity for short-, medium- and long-term housing supply within Eurobodalla will be illustrated in the results section of this report. The audit

and report are not intended to be a forecast of housing supply. The audit details capacity for housing supply based on the best available information as of August 2023. New barriers may emerge, or constraints may be better understood over time which would vary the estimated capacity of identified sites.

This report is structured provide an overview of the current development pipeline, current housing demand and implied housing need within the Eurobodalla LGA. Following this, the methodology undertaken in conducting this audit is detailed. The results section provides a temporal analysis through short, medium and long-term capacity for supply within sites illustrated through text, maps, and graphs.

2. Audit Development Context

2.1 Eurobodalla LGA population growth and housing need

At a regional level Eurobodalla is in the Southeast and Tablelands Region. The Draft South East Tablelands Regional Plan 2041 outlines that by 2041 the region will be home to over 350,000 residents and the nine LGAs that comprise the region will need to provide an additional 63,453 dwellings to service the population growth.

Based on DPE population projections, the increase in population by around 6,000 persons in 2041 would increase implied housing need by around 6,219 additional dwellings. This would lead to an annual dwelling need for approximately 310 dwellings. This is in line with what is outlined in the Draft South East and Tablelands Regional Plan 2041 of 6,222 additional dwellings by 2041 required for Eurobodalla.

Table 1 Dwelling Need and population projection

DPE Population projections	2021	2031	2041	Change between 2021 and 2041
Approximate population	39,179	42,687	45,402	6,223
Implied housing need	26,373	29,927	32,592	6,219
Housing need	-	-	-	6,222

2.2 Housing stock

According to the 2021 ABS Census Data, almost 84 percent of the current housing stock is made up of detached houses with only 9 percent semi-detached and 7 percent residential apartments. The predominant household types driving demand within the LGA are couples without children, lone persons and couples with children. Couples without children are the majority making up 38 percent of the population, followed by lone persons at 31 percent and couples with children at 18 percent. Over the next 20 years, lone person households are projected to increase in proportion by 4 percent, while couples with children are projected to decrease by 3 percent. As of the last census almost 75% of the existing dwellings are 3 and more bedrooms. This predominant housing type is potentially not suitable to meet the needs of the projected house growth in couple only and lone person households.

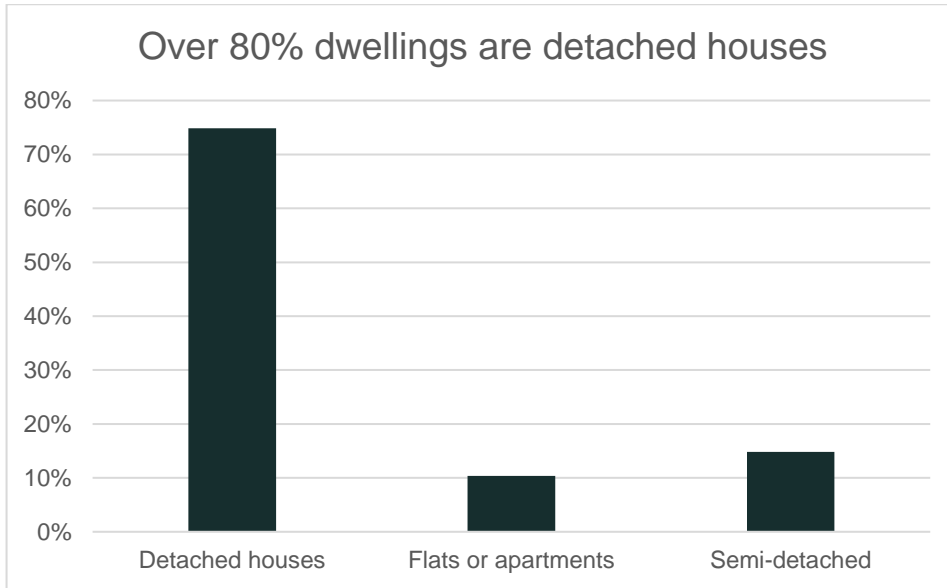


Figure 1: Dwelling Structures, ABS 2021

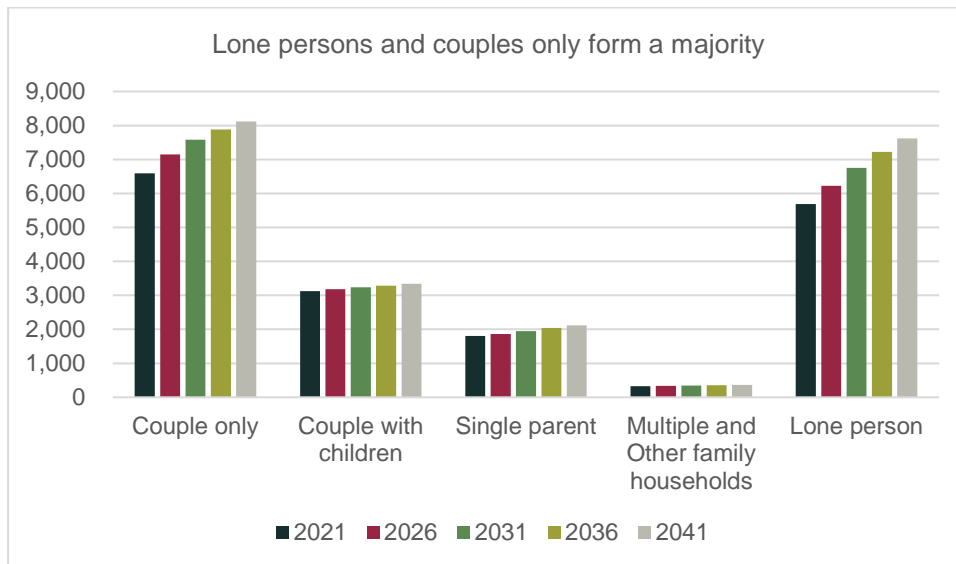


Figure 2: Households characteristics, DPE population projections

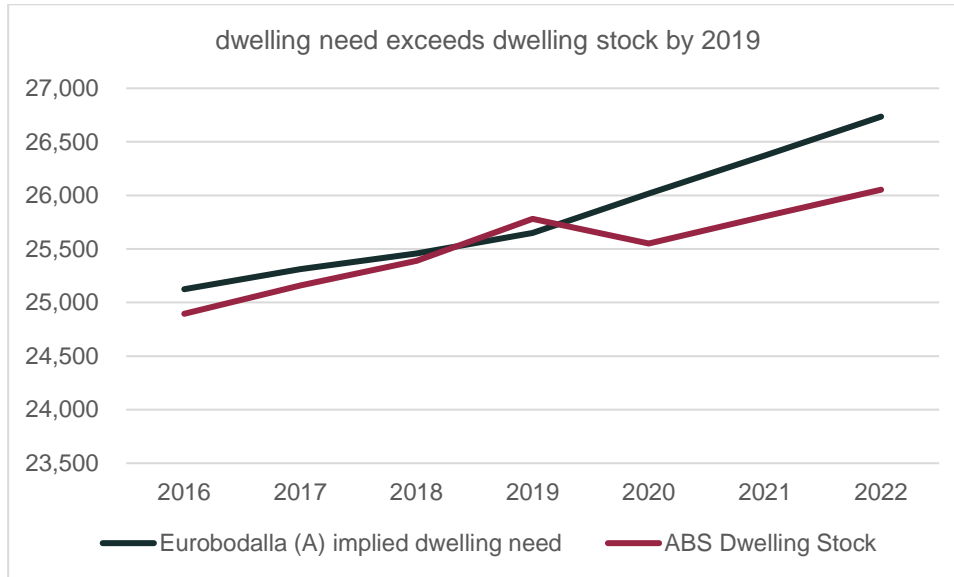


Figure 3: Dwelling need in Eurobodalla

2.3 Current housing supply

Approvals in the Eurobodalla LGA have varied with 302 in 2022 and 231 in 2016. From 2016/17-2022/23, the LGA has on average approved 310 dwellings per year, which is the exact number of dwellings as identified in the DPE dwelling projections.

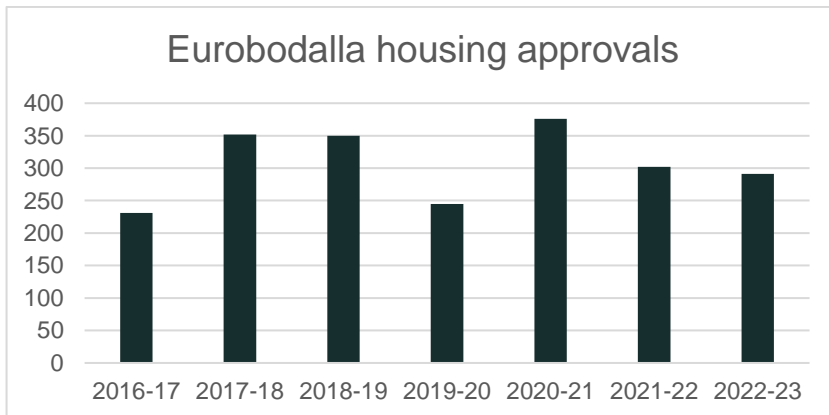


Figure 4: Approvals in Eurobodalla, ABS Dwelling Approvals

3. Audit Methodology

The Audit uses data on the supply and demand of housing from Government sources, Local Council, and infrastructure providers. Housing demand is derived from 2022 DPE population projections. The audit was conducted through a series of stages as illustrated below in figure 5. Each stage brought with it findings and insights that contributed to overall assessment of residential capacity within the LGA. The methodology was adopted from the DRAFT Housing Supply Technical Note published by the Department of Planning and Environment in November 2022.

It should be noted that each site identified in the audit is allocated a tier within the site categorisation stage. The tiers are 1a, 1b, 2a, 2b, 3, 4 or 5. This will be explained more in section 3.2 Site Analysis, however as a quick overview sites that are tiered lower (1a,1b,2a,2b) are the sites that are 'closer' to producing housing.

HSPAs are designed to capture information on planning status, environmental constraints, infrastructure needs and dwelling capacity at a point in time and based on the best publicly available information.

HSPAs do not capture information about all factors that influence when and how planned housing land is developed, such as market feasibility, economic cycles, and materials and labour availability.

Other analyses will need to be undertaken in addition to an audit to gain a full understanding of likely future housing supply.

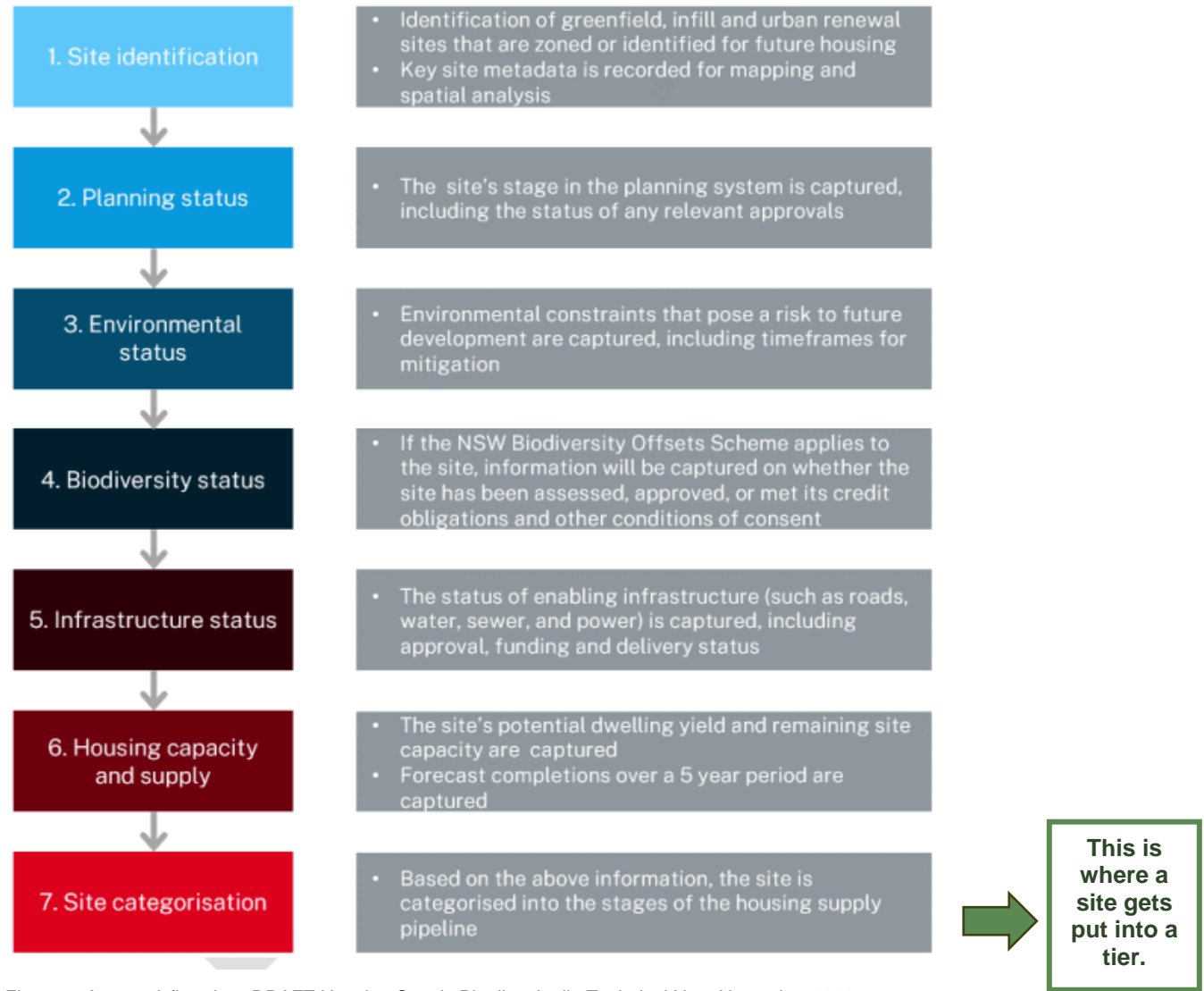


Figure 5: Approach flowchart DRAFT Housing Supply Pipeline Audit: Technical Note November 2022

3.1 Site identification

The first stage of the audit involved identifying sites in both greenfield and infill that have capacity for current and future residential development. This was completed through a review of local planning housing strategies, planning proposals within the area and consultation with DPE and Eurobodalla Shire Council.

Once the research phase was complete a list of sites that have been identified for residential development was tabulated which is when consultation with the DPE and Eurobodalla Shire Council began. This consultation provided an in-depth review on each site.

Throughout the identification phase there were several minor developments that were captured however not included in the audit. This audit has a focus on sites that have a rough potential yield of more than 10 dwellings.

The audit does a thorough analysis however the methodology is tailored towards capturing greenfield development. While infill has historically contributed around 50% of the Eurobodalla Housing supply, the lack of information and data on infill development makes it hard to evaluate the capacity of these sites and their potential to contribute to the housing pipeline.

Sites that were identified for development growth but had filled over 90% of their development capacity for housing were noted but that remaining capacity was not counted within the audit.

3.2 Site analysis

The overall site analysis conducted within this audit focused on the planning, environmental, infrastructure and biodiversity status of sites identified for residential development. The status of these constraints was considered and an overall categorisation was determined for each site. The site analysis conducted within this audit included GIS analysis to understand any present environmental constraints on each respective site. Alongside this a review of planning proposals, development applications and documents by Sydney Water was conducted to identify the status of the infrastructure and planning of each site.

Finally, consultation with the DPE and Eurobodalla Shire Council was conducted to ensure information was accurate. The consultation provided insight from information such as sites that had fragmented ownership, a lack of required infrastructure or funding issues. This information is difficult to acquire from online documentation and provided a more thorough understanding of the sites and constraints.

It should be noted that although the site analysis was in depth and conducted through multiple routes there were varying levels of information available from site to site and challenges regarding a lack of data on specific sites was an issue. Table 2 provides an overview of how the respective planning, infrastructure, environmental and biodiversity status of a site is put into a tier. It must be noted the overall tier of a site is based on the most conservative approach. For example, if a site:

- Had residential zoning with approved subdivision (1a).
- Had the infrastructure capacity to service further development (1a).
- Had an approved BDAR or BCAR with requirements met (1a).
- Had environmental constraints that are likely to be mitigated in 5+ years' time (2b).

The overall tier of the site would be 2b, even though the planning, infrastructure and biodiversity status of the site was all 1a.

Table 2: Assignment of Tier based on the Audit findings

Tier	Planning Status	Infrastructure Status	Environmental Status	Biodiversity Status
1a	<ul style="list-style-type: none"> Land zoned for housing Land has approved subdivision 	<ul style="list-style-type: none"> Land is serviced by infrastructure and has capacity to support further development 	<ul style="list-style-type: none"> No environmental constraints present 	<ul style="list-style-type: none"> Biodiversity assessment not required OR BDAR or BCAR has been approved and requirements have been met
1b	<ul style="list-style-type: none"> Land zoned for housing Land does not have approved subdivision 			
2a		<ul style="list-style-type: none"> Land is not serviced by infrastructure and does not have capacity to support further development. The likely timeframe for the servicing to be delivered is 0-5 years. 	<ul style="list-style-type: none"> Environmental constraints present Constraint likely to be mitigated within 0-5 years 	<ul style="list-style-type: none"> BDAR or BCAR approved but requirements expected to be met in 0-5years.
2b		<ul style="list-style-type: none"> Land is not serviced by infrastructure and does not have capacity to support further development. The likely timeframe for the servicing to be delivered is over 5 years. 	<ul style="list-style-type: none"> Environmental constraints present Constraint likely to be mitigated in over 5 years 	<ul style="list-style-type: none"> BDAR or BCAR not approved and timeframe for requirements to be met in 5+ years.
3	<ul style="list-style-type: none"> Land is not zoned for housing Land has a current or imminent planning proposal 			
4	<ul style="list-style-type: none"> Land is not zoned for housing Land is strategically identified for future housing Land does not have a current or imminent planning proposal 			
5	<ul style="list-style-type: none"> Land is not zoned for housing Land is not strategically identified for future housing Land does not have a current or imminent planning proposal 			

3.2.1 Planning Status

When determining the planning status of a site the key information collected was if:

- the site is strategically identified
- the site requires rezoning or amended planning controls
- there is a current or imminent planning proposal for the site
- the site has received consent for subdivision or development
- any subdivision has been registered

Information was collected through analysing planning proposals, development applications and the active zoning for each identified site. Once understood, the guidelines outlined in the Draft Housing Supply Pipeline Audit: Technical Note were followed. The methods to tier a site based on the planning status are shown in table 2.

As shown above, planning status only allocates sites in tiers 1,3,4 and 5.

3.2.2 Infrastructure Status

The status of infrastructure was based on the following four categories:

- Road Infrastructure: this includes direct road access to a site as well as wider road network upgrades such as intersection and interchanges.
- Water Infrastructure: trunk water mains and capacity to enable a developer to provide lead in infrastructure.
- Sewer Infrastructure: trunk sewer mains and capacity to enable a developer to provide lead in infrastructure.
- Electrical Infrastructure: access to a zoned substation with adequate capacity to support further development.

The status of these infrastructure categories was understood through development applications, planning proposals, documentation from Sydney Water and consultation with council. Information from council was extremely helpful in informing the funding and delivery status of several sites. The method to tier a site based on its infrastructure status as outlined in the Draft Housing Supply Pipeline Audit: Technical Note is shown above in table 2.

3.2.3 Environmental Status

The key information to understand regarding the environmental status of a site are:

- the presence of a type of environmental constraint
- the risk the constraint poses to development delivery
- whether mitigation has been identified (and the likely timeframe for mitigation)

This information was collected through a GIS analysis that identified all present environmental constraints on each site, analysis of planning proposals and development applications and consultation with council. This information allowed for the identified constraints to be categorised in the following way as outlined in the Housing Supply Pipeline Audit: Technical Note guidelines:

- Resolved – constraint has been addressed and requires no further action
- Low risk – constraints are well understood and can be resolved easily
- Medium risk – constraints are well understood but may require additional time and resources to resolve
- High risk – constraints will likely require significant time and resources to resolve
- Critical risk – constraints are likely to prevent lands from progressing to housing delivery
- Further investigation required – the risk of the constraint to development delivery cannot be readily determined

A wide range of environmental constraints were considered for the analysis. Each constraint was classified as mitigable, non-mitigable and undevelopable based on its impact and risk posed. The category mitigable outlines constraints that are low risk, medium or high risk with not mitigable and undevelopable used for constraints of critical risk. The constraints used for the analysis and if they can be mitigated to enable residential development are:

Table 3: Classification of environmental constraints

Mitigable	Non Mitigable	Undevelopable
Strategic agricultural land	Environmental Conservation Area (zones 1&2)	Ramsar wetland
Heritage item		Riparian corridors
Bushfire prone land		Coastal vulnerability
Flood affected land		Koala habitat
Aboriginal culture and heritage		
Heritage conservation area		
Native vegetation / areas of biodiversity value		
Airport noise		
EPA contaminated site		
Landslip risk (slope)		
Environmental conservation area (zones 3&4)		

If a constraint had a mitigation pathway or if mitigation measures had been identified but not implemented, it was considered during this stage of the audit. This provided a timeframe for when a site may be development ready regarding environmental issues. The method to tier a site based on its environmental status

as outlined in the Draft Housing Supply Pipeline Audit: Technical Note is shown in table 2. As seen above, environmental status only allocates sites into tiers 1 or 2.

3.2.4 Biodiversity Status

The biodiversity status of a site was assessed through collation of the following information:

- If a biodiversity assessment is required
- If BDAR or BCAR has been approved
- If the requirements for a BDAR or BCAR have been met
- The likely timeframe for requirements to be met

As shown in table 2, the biodiversity status of sites only allocates sites in tiers 1a, 2a or 2b.

3.3 Capacity Calculation

The yield of each site was calculated within a hierarchical staged approach which was:

1. If a site had yield numbers within a development application and planning proposal this was used.
2. Following this, structure and master plans were reviewed.
3. If there were no numbers available from these sources a yield calculation was completed. This calculation found potential yield on different sites by:
 - a. Subtracting 20% of a sites area to account for required infrastructure use.
 - b. The remaining 80% was then divided by the minimum lot size on the site to calculate the potential yield that site has.
4. Where possible these numbers were reviewed by Eurobodalla Shire Council.

On active 1a sites that had begun production prior to 2023, remaining capacity was calculated by counting the number of end state lots (subdivided lots as of a July 2023 cadastre from NSW spatial services) on sites and subtracting this figure from the overall yield. The remaining capacity was then modelled according to the 10-year greenfield lifecycle.

Environmental constraints were taken into consideration while calculating the yield of a site. The developable area within an identified site was estimated through GIS analysis by factoring in severity of constraints on site and satellite photographs for context.

3.4 Site categorisation

The categorisation of sites into tiers was based on the combined planning, infrastructure, environmental and biodiversity status that each respective site had. As outlined above guidelines were used to sort each site into a tier based on the status of each category.

The overall classification of sites into tiers was based on the following information found in the Housing Supply Pipeline Audit: Technical Note:

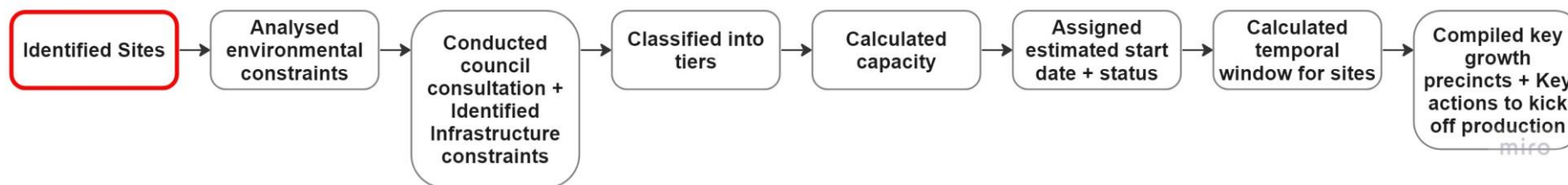
Table 4: Tier classification

Tiers	Definition
Tier 5 - Investigation areas	Potential future investigation, land is not identified in a strategic plan. The suitability of these sites to deliver housing is subject to further investigation, likely to require changes to established planning controls, the delivery of enabling infrastructure and/or environmental offsets strategies. These sites are therefore not counted towards current housing land capacity.
Tier 4 - Strategically identified land	Land identified in a strategic plan (such as Regional Plan or Local Housing Strategy and/or LSPS) - While strategic investigation will have typically confirmed suitability of these sites from a land use planning perspective more detailed investigation and planning and approvals are required. These sites are therefore not counted towards current housing land capacity.
Tier 3 - Land under consideration for rezoning	Changes to LEPs controls including re-zoning are underway with the land being subject to a current or proposed planning proposal that is yet to be determined. These sites are not counted towards current housing land capacity.
Tier 2b - Longer term zoned land supply (more constrained)	Land is zoned, environmental or infrastructure constraints are likely to be resolved in 5+ years. The pathway to resolution may not be well understood or it may be understood but there may be a funding or implementation barrier or barriers that require resolution.
Tier 2a - Medium term zoned land supply (less constrained)	Land is zoned, environmental and/or infrastructure constraints are likely to be resolved within 5 years. The process by which constraints are to be resolved is complete or underway with a high degree of certainty around any mitigation requirements. Trunk infrastructure may be funded but not delivered.
Tier 1b - Short term zoned land supply (awaiting development consent)	Land is zoned, infrastructure enabled and bio-certified. This land is fully or substantially serviced by enabling infrastructure but has not received subdivision approval.
Tier 1a - Development ready land	Land is zoned, infrastructure enabled, bio-certified and subdivision approved.

4. Approach

This section outlines how the official audit methodology was applied with various steps of the process slightly adapted to achieve a more complete view of the Eurobodalla LGA housing pipeline.

The internal process was completed through the following steps in order to address each of the required stages while working through the process.



4.1 Council consultation

Consultation was conducted with Eurobodalla Shire Council, which provided a more specific understanding of the planning, environmental and infrastructure status of each site. Information for each site that was found in planning proposals, development applications and Sydney Water documentation was outlined to council.

Any gaps or errors in the information were pinpointed by council and more specific information regarding funding, ownership status of sites and lesser-known constraints were provided. This information from council allowed improved understanding of the planning, environmental and infrastructure status of the majority of sites and assisted with categorising these sites into tiers.

4.2 Key Growth Precincts and Actions

Sites that play a prominent role in the supply of housing for the LGA were identified as key growth precincts. For Eurobodalla this was sites that had a yield of circa 340 lots and over. All major key growth precincts for greenfield sites within Eurobodalla and key actions that will free up capacity and enable smooth supply over the next 20 years were highlighted. The audit provides an estimate of overall residential land supply in the local area and is to be used as a capacity modelling tool and not a forecast. It does not factor in market conditions and the willingness of owners to sell or develop sites.

4.3 Estimated start date and status

The estimated start dates of each site was assigned based on their tier classification, environmental constraints, infrastructural constraints and discussions with council. While the audit is not a forecast of likely supply of homes, a model of production was used to allocate housing over time. Active sites in which production had begun and completed sites with no more capacity were noted in the process.

4.4 Lifespan of a new greenfield site

To understand the temporal range of capacity a high-level model was developed based on, historical records of greenfield sites, reaching out to developers in the local area and Greenfield performance in the region.

It was determined that a typical new greenfield site has a production lifespan of 10 years. In that period the supply is divided across three phases in the lifecycle of development of greenfield sites.

- First 20% of the housing capacity in the first two years.
- Next 75% of the housing capacity completed in the next six years.
- Final 5% of the housing capacity completed in the last two years.

5. Results of the audit

This audit has identified 16 sites across Eurobodalla that have capacity for 4,692 residential dwellings from 2023 until 2046. The number of sites and capacity in each tier are:

Table 5: Capacity results of the audit

Tier	Number of sites	Combined remaining lot capacity (as of June 2023)
1a	2	529
2a	3	1,112
2b	10	2,956
4	1	95

A summary of each site, classifications, yields, and other considerations is in section 8.

Figure 6 illustrates the dwelling capacity of Eurobodalla that this audit has identified compared to the required number of dwellings that Eurobodalla will need to keep up with demand. This number (310 dwellings annually) was obtained from the NSW DPE implied dwelling demand figures. As displayed this audit has identified a 'gap' in the supply of dwellings Eurobodalla requires by 2041.

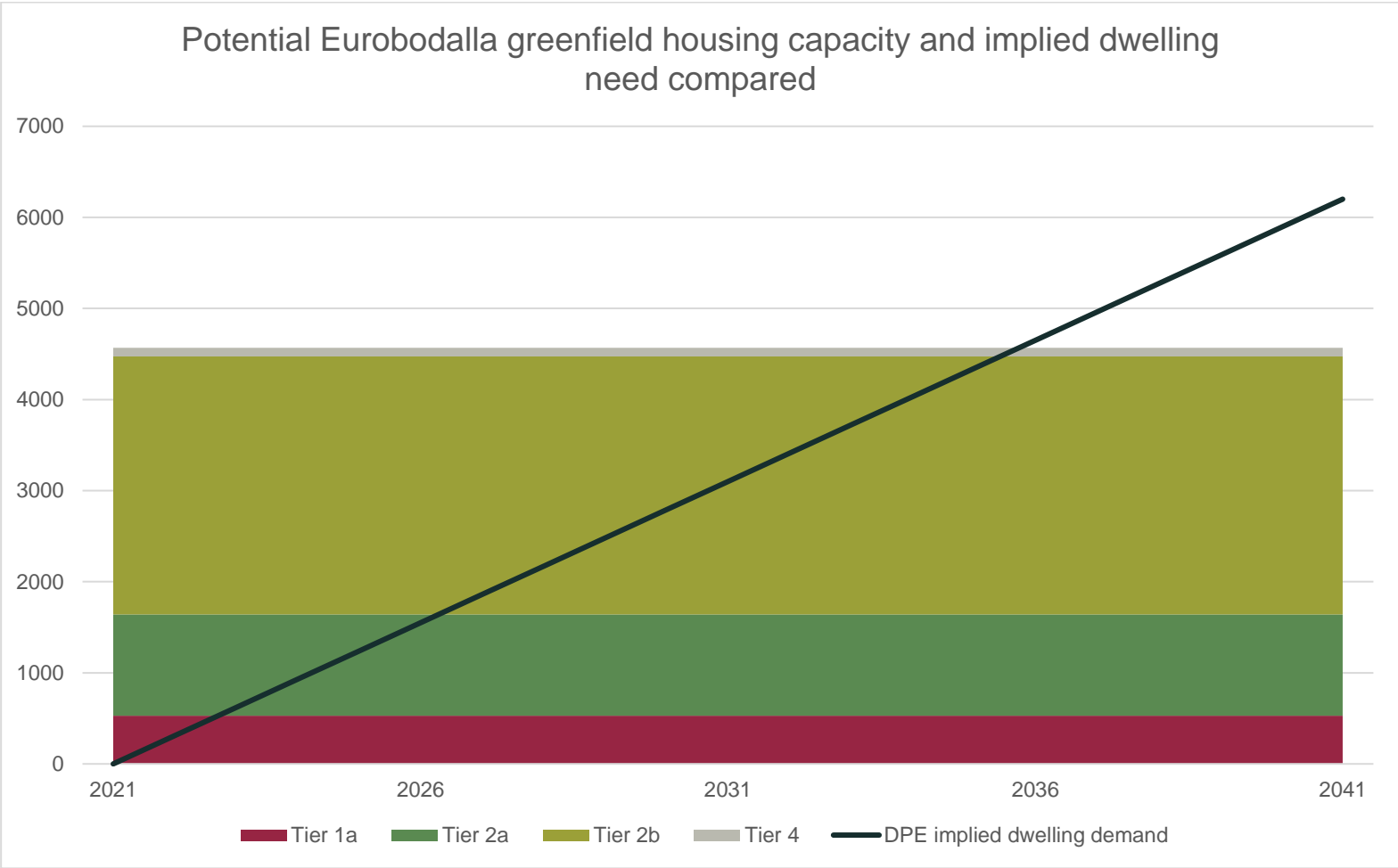


Figure 6: The potential housing capacity of Eurobodalla LGA and the implied dwelling need compared

Figures 7, 8 and 9 illustrate where the sites that have capacity for residential development are situated in the Eurobodalla LGA.

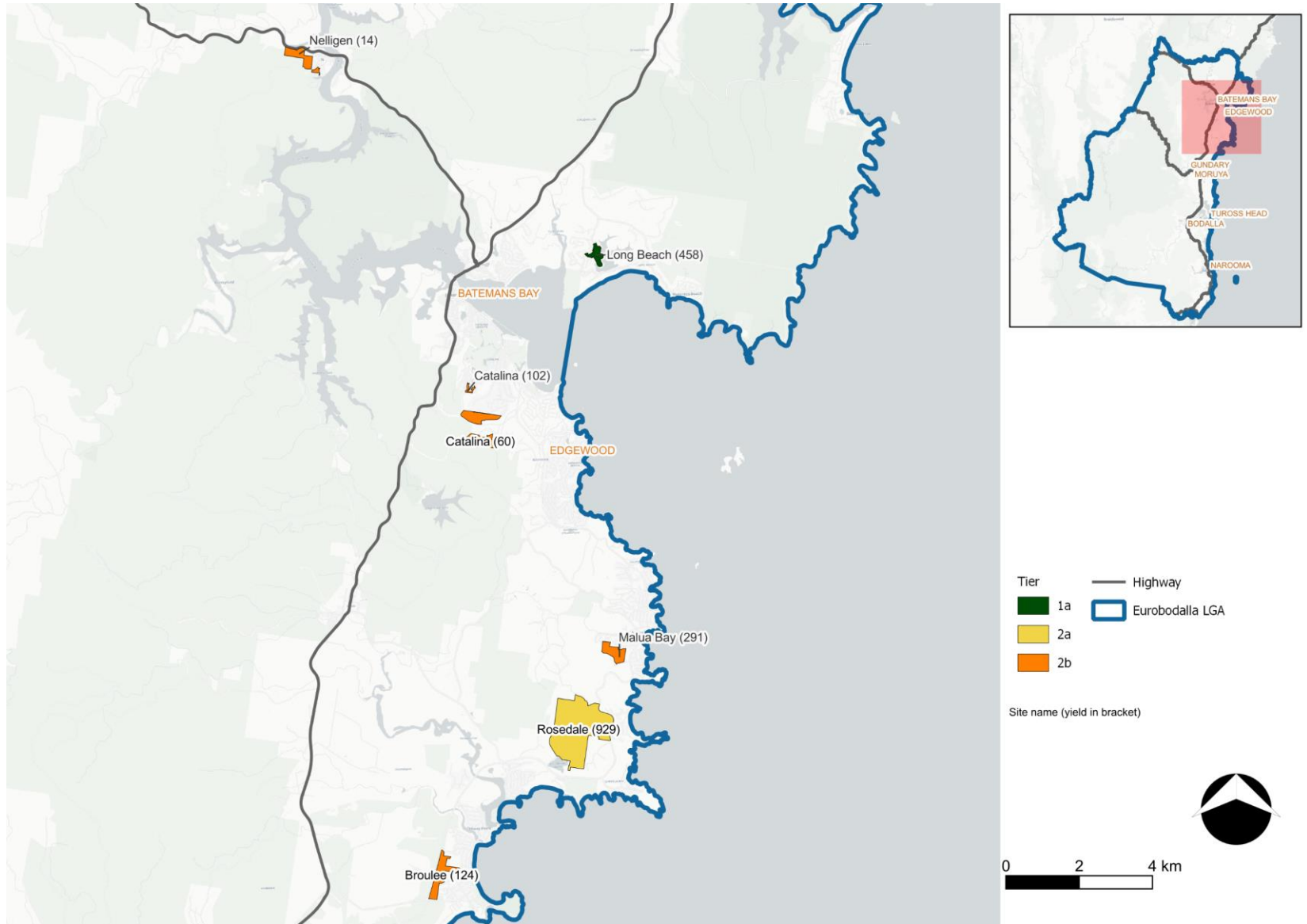


Figure 7: Map one of sites with potential for residential development in Eurobodalla

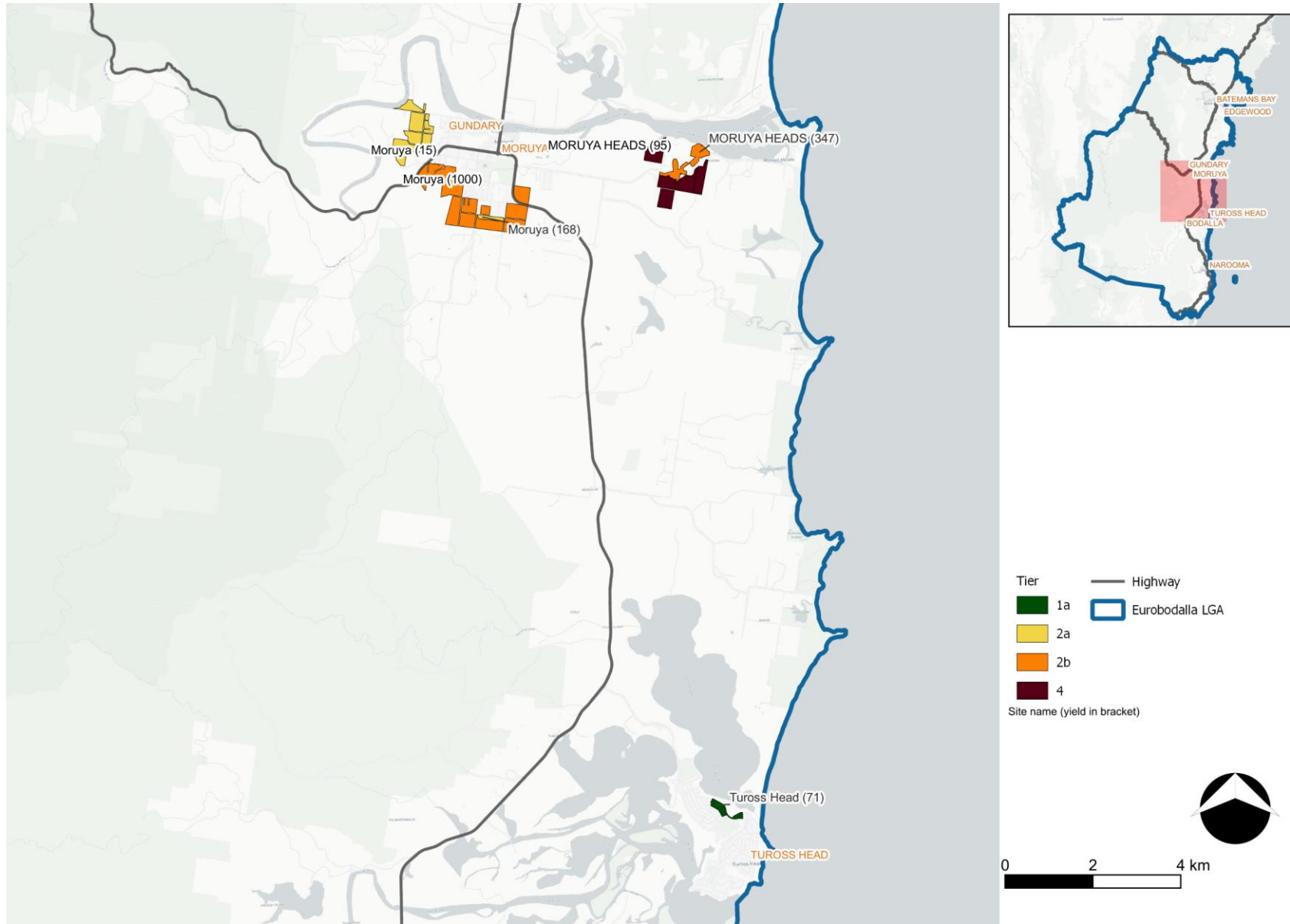


Figure 8: Map two of sites with potential for residential development in Eurobodalla



Figure 9: Map three of sites with potential for residential development in Eurobodalla

5.1 Short term supply: Tier 1 sites

2 of the 16 identified sites are classified within tier 1. Table 6 provides a summary of the capacity, estimated start dates and estimated finish dates of these two tier 1 sites.

Table 6: Current active 1a sites

Site	Tier	Overall capacity	Estimated start	Estimated finish
Tuross Head	1a	71	2023	2032
Long Beach	1a	458	2024	2033

Figure 10 provides a temporal analysis of the Eurobodalla sites that will provide residential development in the short-term. These sites have a combined capacity for 529 residential dwellings and are expected to peak from 2026-2030 producing 66 dwellings a year and be exhausted in 2033.

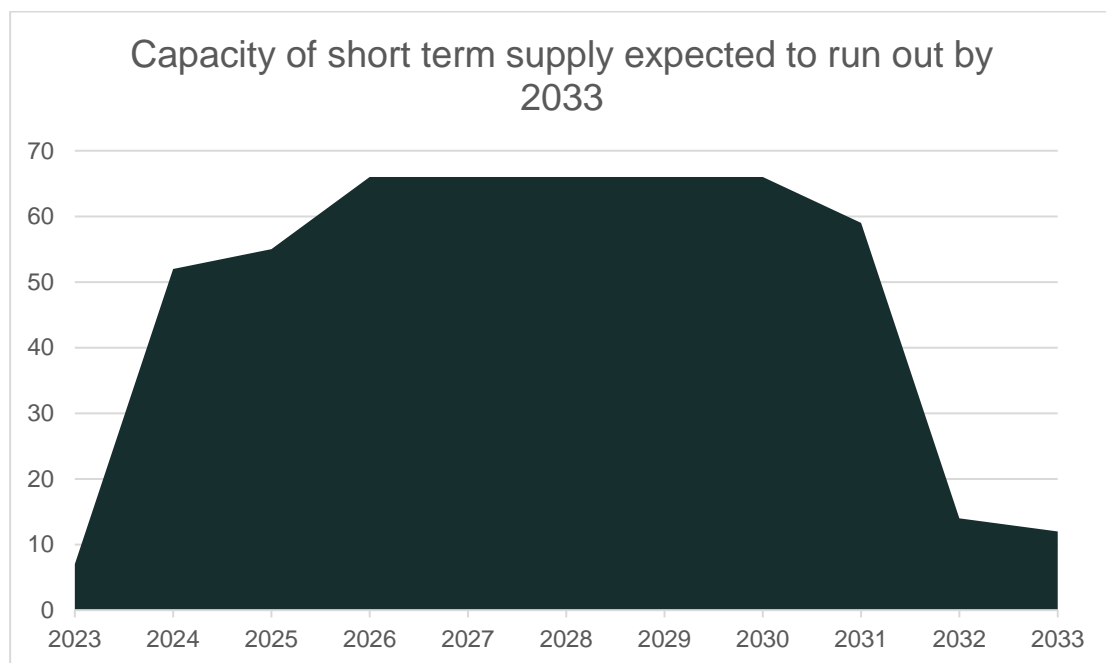


Figure 10: Short term supply

Figures 7 and 8 above illustrate where these sites are situated in the Eurobodalla LGA.

5.2 Medium Term Supply

13 of the 16 identified sites are either classified as 2a or 2b. There are 3 tier 2a sites that have a combined capacity for 1,112 residential dwellings and 10 tier 2b sites that have a combined capacity for 2,956 residential dwellings. Overall, the tier 2 sites identified within this audit have an overall capacity for 3,944 residential dwellings. These sites are estimated to begin at varying timeframes between 2025 and 2035. Table 7 provides a summary of the capacity, estimated start dates and estimated finish dates of all 2a and 2b sites in Eurobodalla.

Table 7: Summary of medium-term supply

Site	Tier	Overall capacity	Estimated start	Estimated finish
Moruya Central North	2a	168	2025	2034
Moruya West	2a	15	2025	2034
Rosedale	2a	929	2026	2037
Nelligen	2b	14	2026	2035
Catalina West	2b	102	2028	2037
Moruya	2b	1,000	2029	2038
Moruya Heads Central	2b	347	2029	2038
Broulee	2b	124	2029	2038
Narooma	2b	248	2030	2039
Malua Bay	2b	291	2030	2039
Mystery Bay	2b	370	2031	2040
Catalina South	2b	60	2033	2034
Dalmeny	2b	400	2035	2040

Sites classified as 2a have the capacity to provide 1,112 residential dwellings and are expected to begin production in 2025, reaching peak production rate by 2029 producing 140 dwellings per year. By 2036 the LGA is expected to have run out of 2a medium-term supply sites.

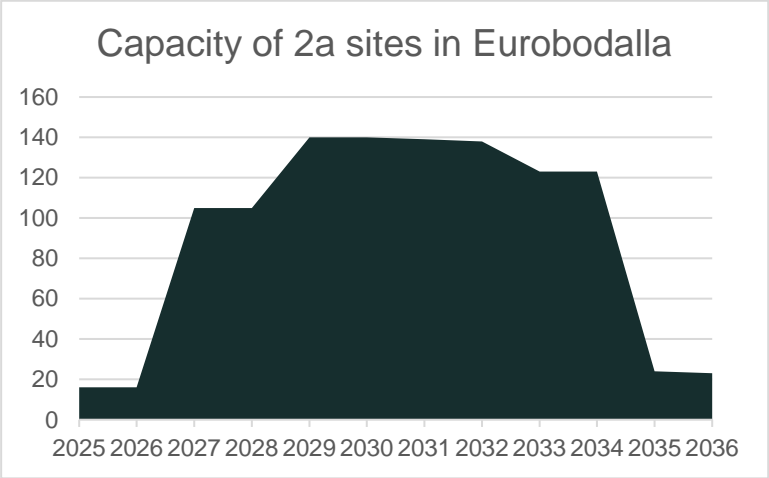


Figure 11: Medium term supply 2a sites

Sites classified as 2b have the capacity to provide 2,956 residential dwellings and are expected to begin production in 2027, reaching peak production rate in 2035 producing 355 dwellings per year. By 2044 the LGA is expected to have run out of 2b medium-term supply sites.

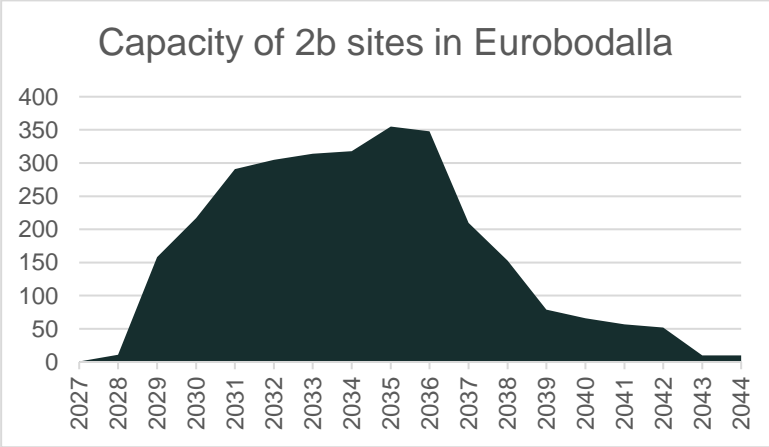


Figure 12: Medium term supply 2b sites

Figures 7, 8 and 9 above illustrate where these sites are situated within Eurobodalla LGA.

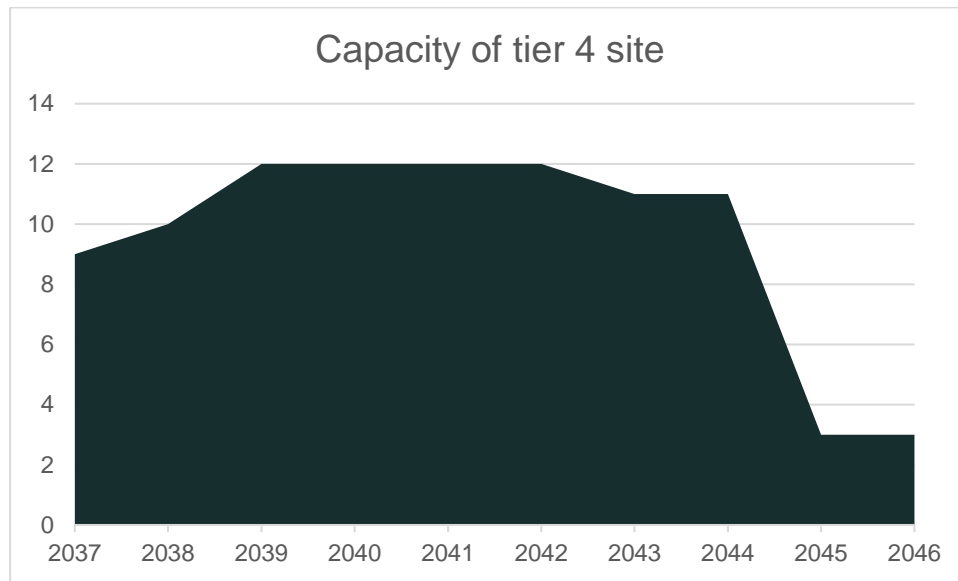
5.3 Long term supply

Moruya Heads South is the only site categorised as a tier 4 site. This site needs to be rezoned to allow residential land uses alongside further investigation to understand any prevalent constraints. Moruya Heads South is expected to begin in 2037.

Table 8 provides a summary of the capacity, estimated start dates and estimated finish dates of Moruya Heads South.

Site	Tier	Overall capacity	Estimated start	Estimated finish
Moruya Heads South	4	95	2037	2046

Figure 13 illustrates the temporal supply Moruya Heads South will provide. The site is expected to peak from 2039-2042 producing 12 dwellings per year and be exhausted by 2046.



5.4 Constraints

The major infrastructure, planning and environmental constraints in Eurobodalla are shown below

5.4.1 Major Infrastructure Constraints in Eurobodalla

The infrastructure constraints in Eurobodalla mainly relate to the lack of servicing infrastructure on several sites across the LGA. Infrastructure constraints affect sites such as Rosedale (capacity for 929 dwellings), Moruya (capacity for 1,000 dwellings), Broulee (capacity for 124 dwellings), Dalmeny (capacity for 400 dwellings) and Mystery Bay (capacity for 370 dwellings).

These sites all require road, water, sewer and electrical infrastructure upgrades to provide the satisfactory level of infrastructure for the dwellings that the sites propose. It was outlined in council consultation that these sites are serviced to the edges and as such the infrastructure these sites are require will be extended from current networks not installed from scratch.

5.4.2 Major Planning Constraints in Eurobodalla

The planning constraint prevalent in Eurobodalla relates to the rezoning of Moruya Heads South (capacity for 95 dwellings). The site cannot enable housing production until it has been zoned for residential land uses.

5.4.3 Major Environmental Constraints in Eurobodalla

The environmental constraints in Eurobodalla affecting each site are noted in table 9 below. In cases where a site is affected by more than one constraint the percentage of the site affected by each constraint is shown. Mitigation measures need to be planned accordingly for the sites to be development ready. The main environmental constraint present in Eurobodalla is bushfire risk, every identified site in this audit is located within a significant proportion of bushfire prone land. Tuross Head is the only identified site that has less than 99% of its area affected by bushfire.

Table 9: Environmental constraints prevalent on Greenfield sites

Site	Tier / Yield	Prevalent constraint
Tuross Head	1a / 71	<ul style="list-style-type: none"> Bushfire prone (41%) SEPP Coastal Wetland (25%)
Long Beach	1a / 458	<ul style="list-style-type: none"> SEPP Coastal Wetland (60%) Bushfire prone (100%) Riparian land (18%)
Moruya Central North	2a / 168	<ul style="list-style-type: none"> Bushfire prone (100%) Riparian land (21%)

Site	Tier / Yield	Prevalent constraint
Moruya West	2a / 15	<ul style="list-style-type: none"> • Bushfire prone (100%) • Riparian land (25%)
Nelligen	2b / 14	<ul style="list-style-type: none"> • Bushfire prone (100%) • Riparian land (26%)
Rosedale	2a / 929	<ul style="list-style-type: none"> • Bushfire prone (100%) • Riparian land (19%)
Catalina West	2b / 102	<ul style="list-style-type: none"> • Bushfire prone (99%) • Landslip risk – slope (32%) • Riparian land (18%)
Moruya	2b / 1,000	<ul style="list-style-type: none"> • Bushfire prone (100%) • Riparian land (21%)
Moruya Heads Central	2b / 347	<ul style="list-style-type: none"> • Bushfire prone (100%) • SEPP Coastal wetland (25%)
Narooma	2b / 248	<ul style="list-style-type: none"> • Bushfire prone (100%) • Biodiversity value (99%) • Riparian land (23%)
Malua Bay	2b / 291	<ul style="list-style-type: none"> • Bushfire prone (100%) • Landslip risk – slope (29%) • Riparian land (17%)
Mystery Bay	2b / 370	<ul style="list-style-type: none"> • Bushfire prone (100%) • Riparian land (17%)
Catalina South	2b / 60	<ul style="list-style-type: none"> • Bushfire prone (100%) • Landslip risk – slope (35%) • Riparian land (15%)
Dalmeny	2b / 400	<ul style="list-style-type: none"> • Bushfire prone (100%) • Riparian land (24%)

Site	Tier / Yield	Prevalent constraint
Moruya Heads South	4 / 95	<ul style="list-style-type: none"> • Bushfire prone (100%) • Biodiversity value (93%) • Riparian land (20%) • Landslip risk – slope (17%) • SEPP Coastal Wetland (13%) • Landslip risk – slope (17%)

6. Additional results

This section provides further results that were found outside of the strict audit methodology but are useful when understanding the Eurobodalla housing supply.

6.1 Temporal supply

Figure 14 illustrates the temporal supply of identified sites in Eurobodalla and the key actions and infrastructure needed to enable housing production in a timely manner. This data was obtained through the approach Gyde took when undertaking the audit with section 4.3 Estimated start date and status and section 4.4 Lifespan of a new greenfield site utilised to get an understanding of the potential temporal nature of Eurobodalla’s housing supply.

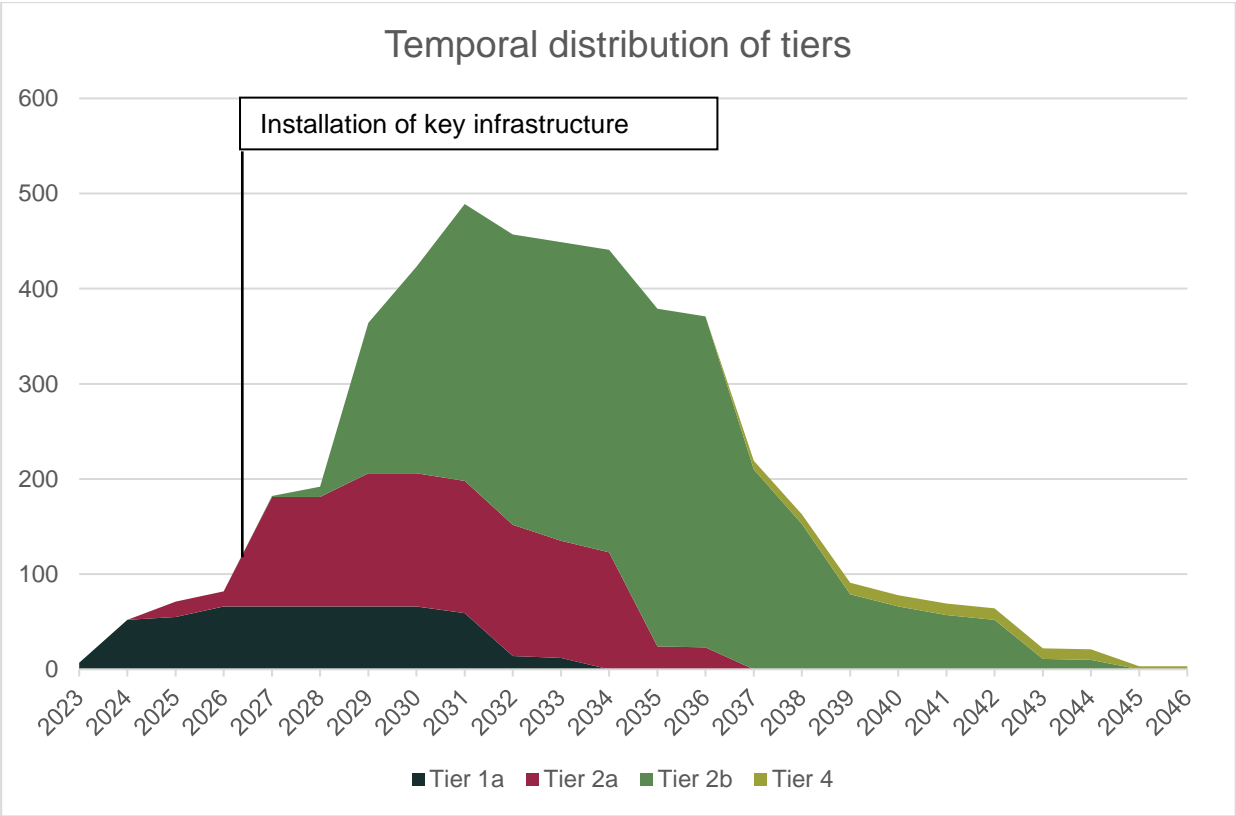


Figure 14: Temporal supply of Greenfield sites and key actions needed to enable supply

6.2 Key Growth Precincts

As a result of this data the following key growth precincts have been identified as imperative to the Eurobodalla housing supply meeting the identified housing demand over the short, medium, and long term:

- Long Beach
- Rosedale
- Moruya
- Moruya Heads Central
- Mystery Bay
- Dalmeny

Combined they have a capacity for 3,504 dwellings in Eurobodalla.

The key actions to enable construction are:

- Environmental constraints
- Servicing of required infrastructure
- Rezoning of Moruya Heads Central

Table 10: Key Growth precincts

Key growth precinct	Tier	Estimated start date	Yield	Action to resolve
Long Beach	1a	2024	458	<ul style="list-style-type: none"> • DA applications submitted but no finalisation • Subdivision works certificate on the site in 2022
Rosedale	2a	2027	929	<ul style="list-style-type: none"> • Requires servicing before major development occurs.
Moruya	2b	2029	1,000	<ul style="list-style-type: none"> • Environmentally constrained • Requires road, water and electrical before development occurs.
Moruya Heads Central	2b	2029	347	<ul style="list-style-type: none"> • Environmentally constrained • Requires road, water and electrical servicing before development occurs.

Key growth precinct	Tier	Estimated start date	Yield	Action to resolve
				<ul style="list-style-type: none"> • Rezoning
Mystery Bay	2b	2031	370	<ul style="list-style-type: none"> • Environmentally constrained • Requires road, water and electrical servicing before development occurs.
Dalmeny	2b	2035	400	<ul style="list-style-type: none"> • Environmentally constrained. • Requires road, water and electrical servicing before development occurs.

Long Beach is identified in tier 1a and is expected to start producing housing in 2024 with an overall yield of 458 dwellings. The constraint holding Long Beach back from development is the finalisation of the submitted DA applications.

Rosedale is identified in tier 2a and is expected to start producing housing in 2027 with an overall yield of 929 dwellings. The constraint holding Rosedale back is a lack of water, road, and sewer infrastructure which is required before development can begin.

Moruya is identified in tier 2b and is expected to start producing housing in 2029 with an overall yield of 1,000 dwellings. The environmental constraints prevalent on the site as bushfire risk and riparian land.

Moruya Heads Central is identified in tier 2b and is expected to start producing housing in 2029 with an overall yield of 347 dwellings. The environmental constraints prevalent on the site are bushfire risk and the coastal wetland SEPP.

Mystery Bay is identified in tier 2b and is expected to start producing housing in 2031 with an overall yield of 370 dwellings. The environmental constraints prevalent on this site are riparian and bushfire prone land.

Dalmeny is identified in tier 2b and is expected to start producing housing in 2035 with an overall yield of 400 dwellings. The main constraints on this site are the environmental issues with the site covered with biodiversity value and bushfire prone land.

6.3 Dispersed infill development capacity

The potential capacity that Eurobodalla has from infill development has been calculated and the results are illustrated within this section. There is a strategic direction towards increased infill development. The Eurobodalla Local Strategic Planning Statement 2020-2040, states 'Eurobodalla's towns and villages have low density, providing an opportunity for future growth. This may occur through increased infill and higher densities in identified and appropriate urban localities.'

The capacity for infill development was calculated in investigation areas based off areas specified in the applicable structure plans (Moruya Structure Plan, Greater Batemans Bay Structure Plan and Batemans Bay Town Centre Structure Plan) and zoned R3 Medium Density Residential across the whole LGA that have the potential to hold residential flat buildings.

Capacity calculation is theoretical based on the planning controls the analysis does not take into account site specific constraints, hazards or changes to government policy (SEPP changes an example). Therefore, the actual capacity of a lot may change following a detailed assessment.

Dispersed infilled yield from investigation areas and uplift sites were calculated through analysis undertaken by Gyde. This analysis involved:

1. Reviewed the planning controls and calculated the maximum yield based on these controls for residential land within the Eurobodalla LGA. See table 11.
2. Removed existing strata lots (the assumption was based on a strata lot has reached full capacity).
3. Removed community infrastructure (schools, hospitals, fire stations etc) and retirement villages.
4. For calculations on multi-unit dwellings the average apartment size was calculated based on recent developments.
5. Removed the existing dwellings to calculate the net capacity.

It is noted, data from this analysis is not a forecast and the capacity numbers for infill and uplift development in Eurobodalla are theoretical and the actual number of dwellings would be different, as the capacity is based on all sites being fully developed.

Table 11: Summary of Eurobodalla planning controls

Scenario #	Zone	Name	Min. Lot size (m ²)	Max. Building Ht (m)	Assumed # Storeys	Assumed FSR (resi only) or infill multi-dwelling rate	Highest Yield Residential Use
1	R2	Low Density Residential	550	8.5	2	1 dwelling / 250m ²	Multi dwelling housing (minimum 3 dwellings i.e. 750m ²)
2	R3	Med. Density residential	550	8.5/10	2	1 dwelling / 250m ²	Multi dwelling housing (minimum 3 dwellings i.e. 750m ²)

Scenario #	Zone	Name	Min. Lot size (m ²)	Max. Building Ht (m)	Assumed # Storeys	Assumed FSR (resi only) or infill multi-dwelling rate	Highest Yield Residential Use
3	R3	Med. Density residential	550	11.5/12/12.5	3	1.1:1	Residential flat buildings (minimum site area 750m ²)
4	R3	Med. Density residential	550	15	4	1.5:1	Residential flat buildings (minimum site area 750m ²)
5	R5	Large Lot Residential	1500	8.5	2		Dual occupancy (but assume single dwelling only)
6	R5	Large Lot Residential	5000	8.5	2		Dual occupancy (but assume single dwelling only)
7	R5	Large Lot Residential	20000	8.5	2		Dual occupancy (but assume single dwelling only)

Alongside the analysis for investigation areas, this audit picked up several infill sites that are currently active DA's in the planning system however they do not 'fit' within this audit and are unable to be tiered in the methodology. This is due to the audit itself outlining, 'Only particularly large or significant dispersed infill and rural residential sites should be included in the residential land audit'. As such, the methodology does not provide a place for small infill and uplift sites. Table 12 gives an overview of the yield and status of some infill sites that were identified but not included.

Table 12: Infill sites active DA's in the planning system

Site	Yield	Status
121 Campbell Street, Narooma	11	<ul style="list-style-type: none"> • Council requesting further information
58-60 Country Club Drive, Catalina	17	<ul style="list-style-type: none"> • Currently under review by council officer
20 Heradale Parade, Batemans Bay	58	<ul style="list-style-type: none"> • Council requesting further information
29 Beach Road, Batemans Bay	13	<ul style="list-style-type: none"> • Council requesting further information
63 Golf Links Drive, Batemans Bay	20	<ul style="list-style-type: none"> • Currently under review by council officer

1a Bent Street, Batemans Bay	27	<ul style="list-style-type: none"> • Council requesting further information
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Figure 15 illustrates the total theoretical housing capacity of the Eurobodalla LGA inclusive of dispersed infill development compared to the Eurobodalla housing demand. This includes the potential capacity Eurobodalla has for infill development (approximately 21,900 dwellings from uplift and infill residential development).

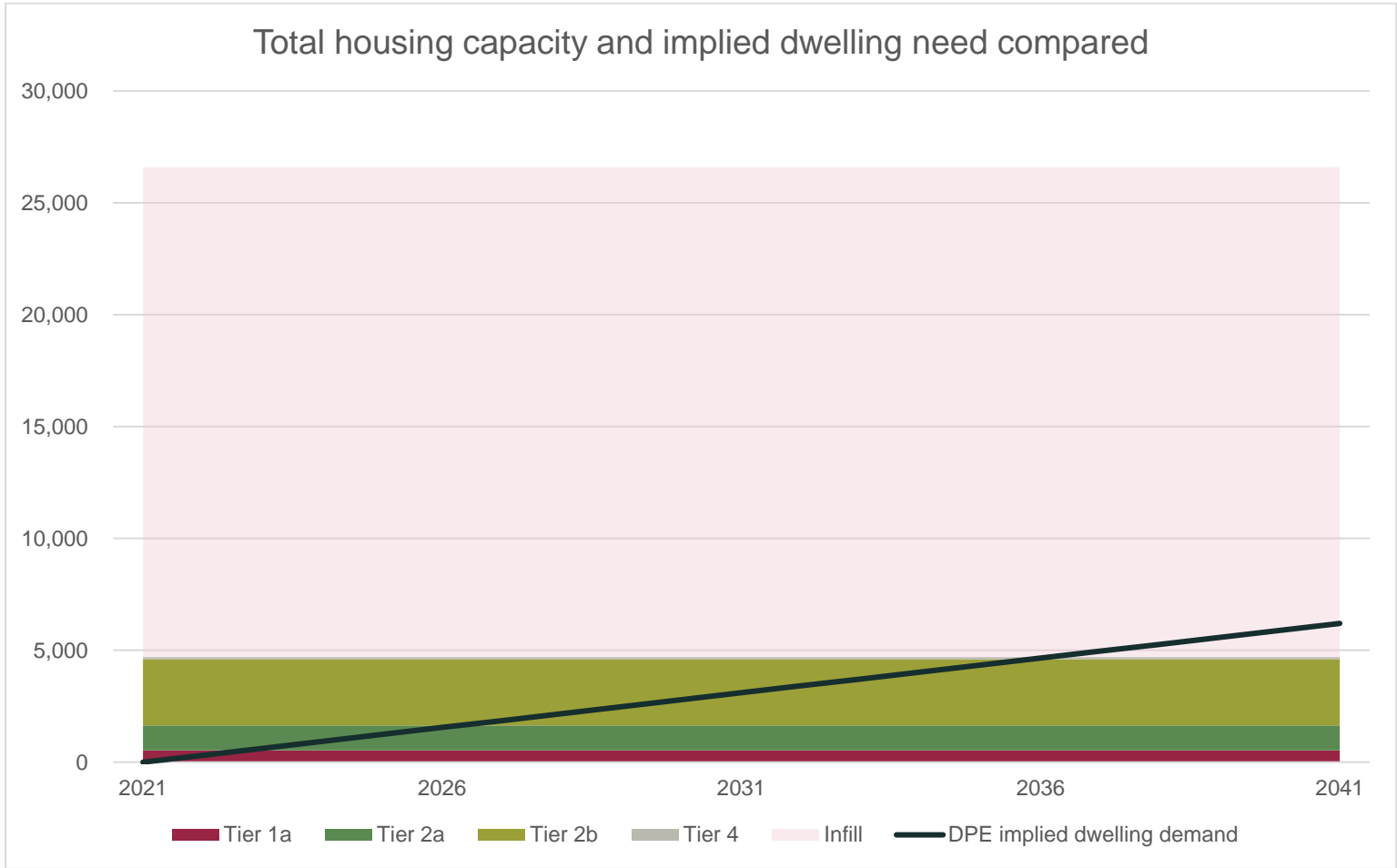


Figure 15: Total housing capacity and implied dwelling need compared

Figures 16, 17 and 18 convey where the theoretical capacity Eurobodalla has for dispersed infill development is situated across the LGA.

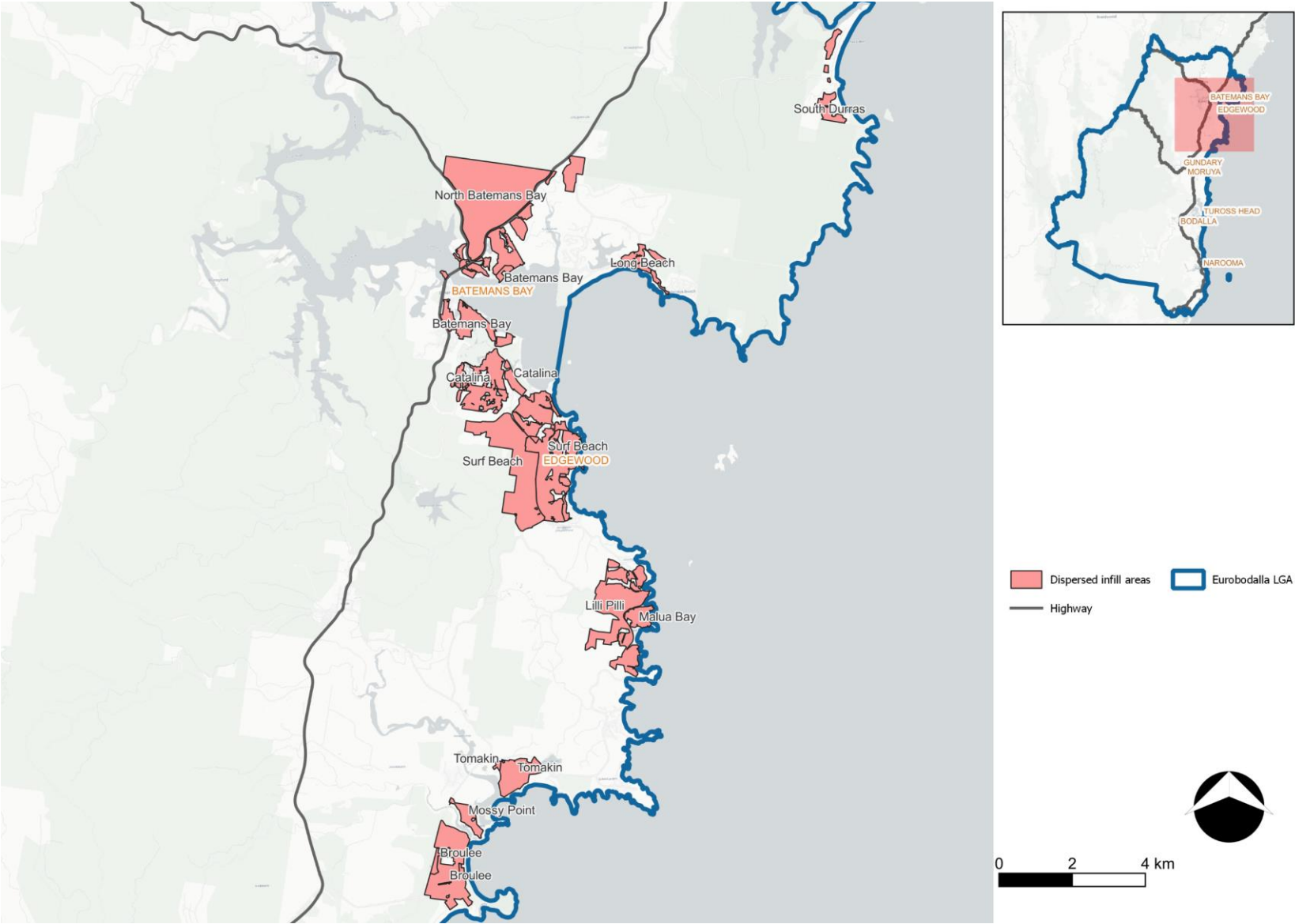


Figure 16: Eurobodalla capacity for dispersed infill development



Figure 17: Eurobodalla capacity for infill development

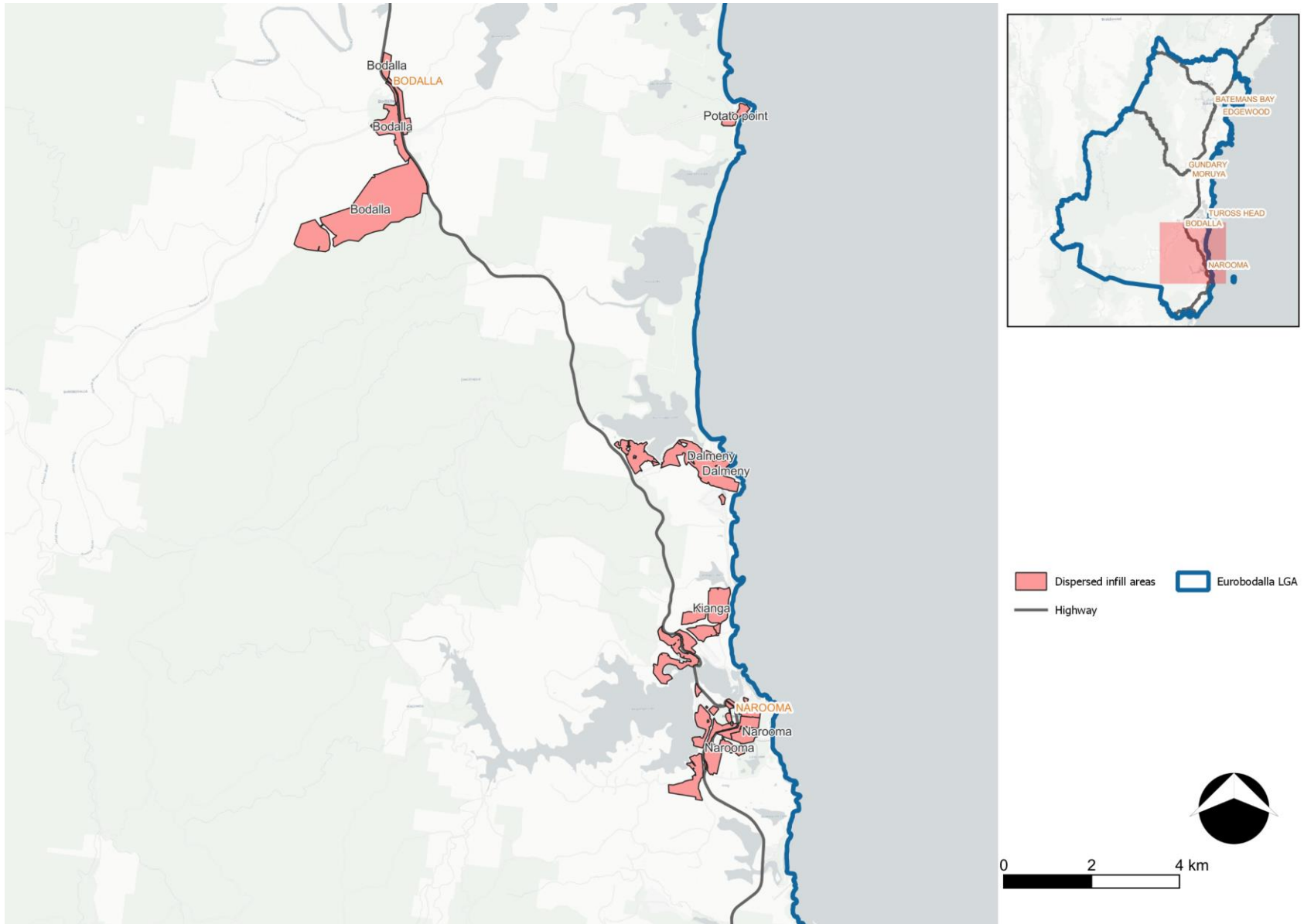


Figure 18: Eurobodalla capacity for uplift development

The theoretical infill capacity of each of the above identified areas is as follows:

Site	Theoretical capacity	Site	Theoretical capacity
Batehaven	1290	Moruya Heads	708
Batemans Bay	3756	Mossy Point	509
Benandarah	11	Narooma	1913
Bodalla	408	Nelligen	17
Broulee	1529	North Batemans Bay	942
Catalina	1399	North Narooma	779
Dalmeny	1323	Potato Point	44
Denham's Beach	421	South Durras	563
Kianga	212	Sunshine Bay	1312
Lilli Pilli	608	Surf Beach	1145
Long Beach	467	Surfside	494
Maloneys' Beach	2	Tomakin	340
Malua Bay	1518	Tuross Head	56
Moruya	158		
Total theoretical dispersed infill	21,924		

6.4 Infill housing activity

The dispersed infill analysis above is based on the theoretical capacity of Eurobodalla infill residential zones rather than what might be delivered. The current approval numbers from the ABS for approvals were analysed to understand the volume of development. Figure 19 below summarises the last 7 years of housing approvals, with Eurobodalla approving, on average 310 dwellings per year. Based on the large number of infill development relative to the small number of new greenfield sites coupled with Council’s strategic direction to focus on urban renewal, an 80/20 split will be used to further understand Eurobodalla’s housing capacity. This means 80% of Eurobodalla’s historic approvals are assumed to be for infill development with 20% for greenfield, resulting in 248 infill approvals yearly. If this level of activity was maintained Eurobodalla would theoretically produce 4,216 infill dwellings over the next 17 years from 2023-24 to 2040-41. As highlighted in section 6.3 there is enough theoretical infill capacity to accommodate 21,924 dwellings however, this does not take into consideration the feasibility of the sites.

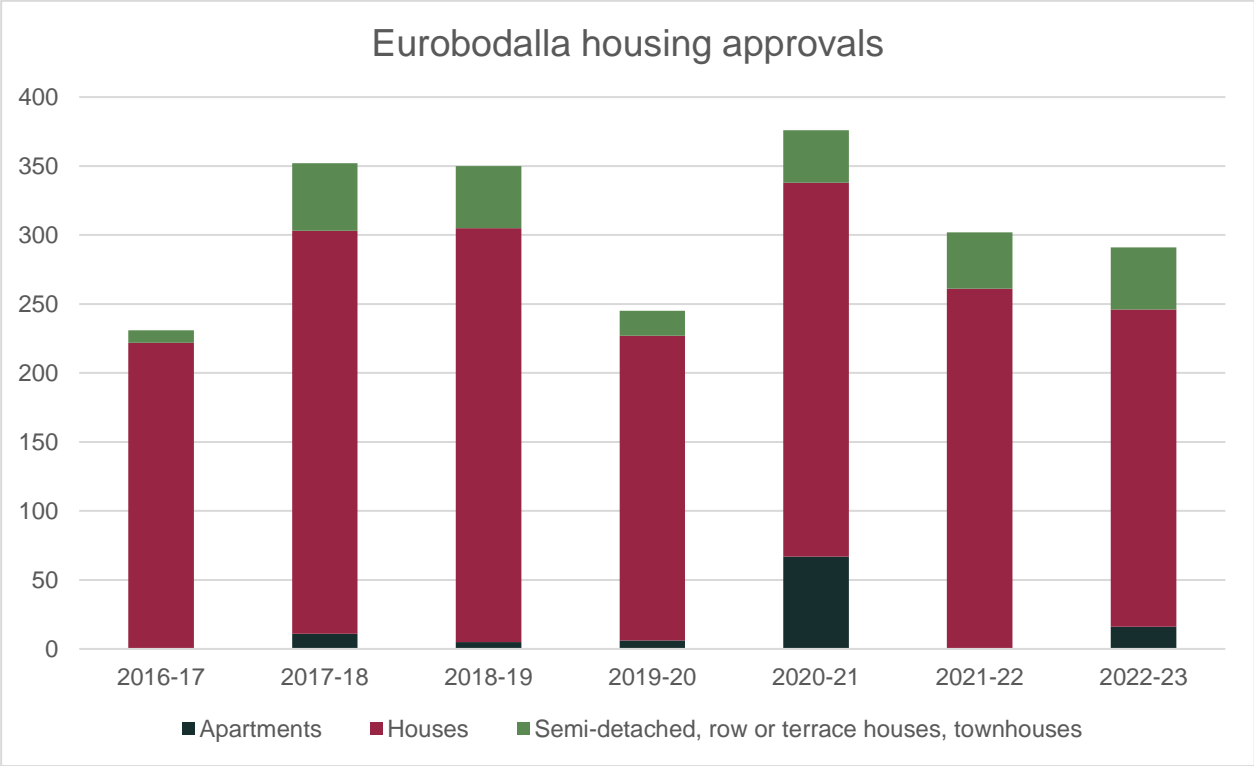


Figure 19: Eurobodalla housing approvals (Source: ABS)

7. Conclusion

This audit has identified that Eurobodalla is overall reliant on infill development to meet its housing needs, with a minor number of dwellings coming from greenfield development. All greenfield development identified in the audit is highly constrained, dominated by biodiversity, flooding and bushfire. While constraints have the potential to be managed, the presence of these constraints can reduce the capacity and feasibility of identified sites and also delay the production of new homes.

As the audit is tailored towards identifying greenfield development no infill sites have been identified.

The majority of housing is coming from sites that have been identified in tier 2b.

In order for the housing supply to keep up with the projected demand of 310 dwellings per year mitigation of bushfire prone land and upgrading of key servicing infrastructure needs to occur.

This audit has identified 16 sites across Eurobodalla Council that have the potential capacity to accommodate 4,692 dwellings. Further, this audit has identified Eurobodalla as having the theoretical capacity for 21,900 dwellings from uplift and infill residential development based on dispersed infill yield analysis. Currently around 248 infill dwellings per year are approved based on historical approval numbers.

1. Limitation

There are multiple variables that can impact changes in the projected supply and demand of housing that include economic, social and government policy decisions.

Examples include:

- Changes in temporary workforce. An increase in investment, new infrastructure projects and other capital works can increase in number of people looking for temporary accommodation and housing.
- Changes in migration patterns and peoples living preferences. Since COVID-19, there have been some changes to the way that people live and work. Factors like an increase in people working from home, sea and tree changes will have an impact in overall demand.
- Changes to the climate. As the climate increases in volatility the safety of sites that are bushfire or flood prone may decrease overtime and with that the feasibility of dwellings being situated on these sites.
- Changes in government policy such as international migration numbers. While out of control of the States and Local Governments, the number of migrants, including students permitted to arrive into Australia have a large impact in housing demand.
- Overall impacts on demand as a result of economic conditions like changes to interest rates.
- Changes to the processing times of development applications that council is currently able to achieve.

Information up to date as of August 2023 have been factored in while developing the audit. Changes in circumstances and variables that may affect development will need to be addressed in future updates of the audit.

Throughout the audit process council input was critical to receive more up to date data and understand any gaps we may have missed through consultation with private industry. The reliability of data from council regarding key sites may lack a high level of certainty.

This audit is also much more tailored towards understanding residential capacity from greenfield sites than infill sites. The audit also provides little scope to apply how likely a development is to occur.

The risk of the land audit being considered a forecast needs to be addressed. The audit does not take into account feasibility or the capacity of the industry to deliver housing, and as such using the above graphs as forecasted numbers would be unreliable

8. Overview of sites

Site Name	Tier	Existing Zone	Activity Status	Summary of attributes	Yield	Capacity left (as of June 2023)
Tuross Head	1a	R2	Not active	<ul style="list-style-type: none"> Development application in for the site 	71	71
Long Beach	1a	R2	Not active	<ul style="list-style-type: none"> Subdivision works certificate on the site and DA applications created but not finalisation 	458	458
Moruya Central North	2a	R3	Not active	<ul style="list-style-type: none"> Zoned R3 Medium Density Residential 	168	168
Moruya West	2a	RU1, C4, E4	Not active	<ul style="list-style-type: none"> Bushfire prone 	15	15
Rosedale	2a	R2	Not active	<ul style="list-style-type: none"> Major area for development Most active greenfield site for Eurobodalla Will require servicing prior to major development 	929	929
Moruya	2b	R2, R3, R5, RU4	Not active	<ul style="list-style-type: none"> Bushfire prone Upgrades to servicing infrastructure occurring 	1,000	1,000
Narooma	2b	R2	Not active	<ul style="list-style-type: none"> Bushfire prone and biodiversity valued land 	248	248
Broulee	2b	C2, R2, R3	Not active	<ul style="list-style-type: none"> Significant upgrade of local sewer system is required Road infrastructure upgrade also required 	124	124
Malua Bay	2b	R2	Not active	<ul style="list-style-type: none"> Bushfire prone Requires servicing infrastructure 	291	291

Site Name	Tier	Existing Zone	Activity Status	Summary of attributes	Yield	Capacity left (as of June 2023)
Nelligan	2b	R5, RU5	Not active	<ul style="list-style-type: none"> Bushfire prone 	14	14
Moruya Heads Central	2b	R2	Not active	<ul style="list-style-type: none"> Upgrades to infrastructure occurring Bushfire prone 	347	347
Catalina West	2b	R2	Not active	<ul style="list-style-type: none"> Bushfire prone and landslip risk 	102	102
Mystery Bay	2b	R2	Not active	<ul style="list-style-type: none"> Bushfire prone 	370	370
Catalina South	2b	R2, R5	Not active	<ul style="list-style-type: none"> Very bushfire prone + steep 	60	60
Dalmeny	2b	R2	Not active	<ul style="list-style-type: none"> Very constrained not certain to go ahead Power lines run through the site Bushfire report will dictate exact yield 	400	400
Moruya Heads South	4	C4	Not active	<ul style="list-style-type: none"> Zoned C4 Environmental living Will need to be rezoned Bushfire prone and has biodiversity value 	95	95

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