

1 October 2026

Mr Greg Doyle
General Manager
Wollongong City Council
Locked Bag 8821
WOLLONGONG DC NSW 2500

Sent to: council@wollongong.nsw.gov.au

Dear Ms Doyle

West Dapto Draft Development Control Plan

I write in regard to the public exhibition of the Draft West Dapto Development Control Plan (DCP) Chapter D16.

Urban Taskforce Australia appreciates efforts by councils to ensure that planning controls are up to date and appropriate. However, there are elements within this draft DCP that appear to raise the bar too high, such that housing supply may be restricted within the West Dapto Release Area.

Urban Taskforce contends that measures proposed in the draft DCP will make the delivery of housing more complicated, expensive and in so doing, will undermine housing development feasibility.

In the midst of a housing supply crisis, a review of the performance of Wollongong LGA is instructive. Over the period of the National Housing Accord to May 2026, Urban Taskforce researchers have found that Wollongong LGA completed just over 2,000 new dwellings, this representing approximately 60% of its pro-rata National Housing Accord completions target. While this is better than many of your Sydney counterparts, the results reflect the need to further improve. A key factor in that is to ensure and improve housing development feasibility.

Urban Taskforce believes that Council should be more pragmatic in setting its controls and look to use them to facilitate future development within the West Dapto Release Area.

Housing

Urban Taskforce is concerned that variable and often too large minimum lot sizes, are constraining opportunities for new housing supply within the West Dapto Release Area. Adopting greater flexibility in minimum lot sizes creates an immediate opportunity for stronger housing supply, affordability and diversity within the Wollongong LGA.

Urban Taskforce understands that parts of the West Dapto Urban Release Area (specifically Calderwood) are zoned for 300sqm minimum lot sizes.

Urban Taskforce recommends that consideration be given to reducing minimum lot sizes within areas of West Dapto that are zoned but not yet delivered or are to be rezoned for future delivery.

Having more permissive and consistent controls around lot sizes across the West Dapto Urban Release Area removes a key planning barrier to increasing housing supply and diversity.

Protection of Water Quality

Sections 7.6.1 (d) and (e) incorrectly appear in the draft DCP under the heading Objectives. Both refer to targets – (d) refers to stormwater quality targets and (e) refers to nitrogen load reduction targets.

Targets are not objectives – they are means toward achieving an objective. Rather, the Objective is the protection of water quality in the receiving waters and Lake Illawarra.

Section 7.11 (o) requires the Chapter E15 stormwater quality targets to be met “as a minimum.” This wording does not encourage the consent authority to consider alternative merit-based solutions – for example, outcomes and recommendations from the Riparian Corridor Management Strategy –West Dapto (2025), DIPNR's Riparian Corridor Management Study (2004) or accepted methods like NorBE.

Urban Taskforce suggests that Sections 7.6.1 (d) and (e) should be replaced by an Objective related to the protection of water quality in the receiving waters and Lake Illawarra.

Urban Taskforce further recommends that Section 7.11 (o) should explicitly contemplate flexibility and willingness to accept reasonable alternative solutions that achieve the stated stormwater quality objective.

Riparian Corridors

Section 8.3 has been amended to provide that certain land may be “dedicated at no cost to Council, for use as bushland, agricultural or recreational purposes. Council may require funding for ongoing maintenance and management of dedicated land.” (new wording underlined for emphasis).

Section 8.3 further provides that no development contributions offset applies to the dedication or transfer of that land. The combined effect of those provisions is that the land is transferred to Council at no cost, the owner receives no offset against contributions, and the owner may nevertheless be required to fund the ongoing maintenance of the land in perpetuity.

Urban Taskforce recommends that the sentence in Section 8.3 providing that Council may require funding for ongoing maintenance and management of dedicated land should be deleted.

A2: Ecological Sustainable Development

It is unclear why large sections of Chapter A2 are restated within the draft chapter. Chapter A2 applies to the whole LGA and it only complicates matters for large parts of it to be repeated in the draft chapter.

Applicants will be required to address both chapters and, where an inconsistency arises, the duplication will create confusion as to which control prevails.

Urban Taskforce is concerned that some of the controls are impractical within a residential subdivision context. For example, Section 8.4.1.2(2) requires street open space *sufficient to establish an interlocking tree canopy*.

While urban cooling is an important objective, the requirement for an interlocking canopy is impractical as it clashes with bush fire protection requirements under *Planning for Bush Fire Protection* and competes with services and street lighting in the road reserve.

Urban Taskforce recommends that Section 8.4 be reduced to controls that are specific to West Dapto and capable of being satisfied by a proponent, with the canopy control made conditional on bush fire and utility requirements.

Road Frontage Requirement

Performance Criteria 1 of Table 1 requires a local park to have "road frontage: 100% (i.e. roads on all 4 sides of the local park)".

There are numerous examples of successful parks without frontage on all four sides, and of poor parks with it. Parks that adjoin, or integrate with, natural features such as bushland, riparian corridors and the escarpment are frequently considered the more desirable outcome.

Urban Taskforce recommends that the requirement for local parks to have road frontage on all four sides be deleted.

Conclusion

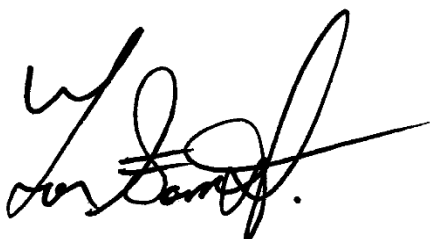
Urban Taskforce Australia urges Wollongong Council to prioritise the delivery of new housing supply to meet the needs of its growing population.

Controls in the draft DCP should not be allowed to undermine new housing projects by making development unfeasible or by wrapping up projects in red tape.

We encourage Wollongong Council to apply pragmatism to these controls so that it can meet the growing demand for housing within the LGA.

Should you wish to discuss any aspect of this submission further, please call our Economist and Policy Analyst, William Hughes on 0418 286 530 or via email at will@urbantaskforce.com.au

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending from the end.

Tom Forrest
Chief Executive Officer