22/06/2026

Lake Macquarie City Council
Attn: Integrated Planning,
Box 1906,
Hunter Region Mail Centre,
NSW, 2310.

Lake Macquarie City Draft Housing Strategy Submission

To whom it may concern

Thank you for the opportunity to provide input to the *Lake Macquarie City Draft Housing Strategy* (Strategy) and taking the time to consider our submission.

Executive Summary

CLEANaS supports the overall direction of the Draft Housing Strategy but identifies several areas where the Strategy needs to be strengthened to meet Lake Macquarie's housing, sustainability and emissions reduction goals.

Lake Macquarie's emissions have stalled, with only a 0.2% per-capita reduction in 2023/24, and housing and transport remain major contributors. Because planning decisions strongly influence energy use, transport patterns and long-term emissions, the Housing Strategy is a key tool for helping the city meet its climate commitments.

The Strategy includes positive steps—such as walkability, tree canopy, avoiding development in sensitive areas and improving liveability—but it lacks clear commitments to sustainable, resilient, all-electric housing. CLEANaS recommends strengthening the DCP to support higher BASIX standards, EV-ready and solar-ready design, passive cooling, green infrastructure, water-sensitive urban design and discouraging new gas connections.

CLEANaS supports Transit-Oriented Development and the Low and Mid-Rise Housing Policy, but raises concerns about the very low 2% affordable housing contribution in TOD areas.

Affordable housing is a major gap. While Lake Macquarie has more social housing than the NSW average, much of it is ageing stock from the 1960s–70s and no longer meets community needs. The Strategy proposes no local affordable housing contribution scheme, no inclusionary zoning and no targets. CLEANaS recommends:

CLEANaS is a not-for-profit association dedicated to driving the uptake of clean energy in Newcastle and surrounds through community owned projects and activities. http://cleanas.org.au/

- setting clear affordable housing targets and publicly reporting progress
- requiring 30% affordable and social housing on government-owned land
- identifying suitable Council-owned infill sites and tendering them to community housing providers

Finally, the Strategy needs a much stronger implementation framework. Many good ideas in supporting studies are not translated into actions, and the performance measures are too general to track progress meaningfully.

Overall, CLEANaS urges Council to strengthen the Strategy so it delivers sustainable, resilient neighbourhoods and ensures affordable housing is a core outcome for the community.

The Clean Energy Association of Newcastle and Surrounds (CLEANaS) supports the overall strategy. However, we wish to raise concerns and provide feedback on the strategy.

CLEANaS is a not-for-profit association formed in 2012 by a group of locals passionate about clean energy.[1] CLEANaS is dedicated to driving the uptake of clean energy so that our region can transition from its current dependency on fossil fuels to a more competitive and sustainable local economy. We achieve this by working with our partners to demonstrate profitable community-led and community-owned clean energy projects; raise the profile of clean energy in the local economy through education and awareness raising; and by improving access to financing mechanisms and affordable technologies so that investment and activity grow. Our initiatives must deliver a win-win for local community investors, local enterprise and, of course, our environment.

The Need for Rapid Emissions Reduction

The amount of CO2 in the atmosphere keeps on going up and up from the burning of fossil fuels – principally coal, oil and gas. Australia has set a legislated target to reduce our greenhouse gas emissions to net zero by 2050. To help drive the transition to net zero, the Australian Government has set a target to reduce emissions to 62-70% below 2005 levels by 2035.[2]

[1] http://www.cleanas.org.au/
[2] Department of Climate Change, Energy, the Environment and Water. (2025). Net Zero. Retrieved 10 June 2026, from https://www.dcceew.gov.au/climate-change/emissions-reduction/net-zero

The Role of Local Councils in Driving Net Zero

Councils are uniquely positioned to help the drive towards net zero emissions through their connection to local communities, and their existing mandate to provide support and infrastructure to residents and businesses. Councils can drive new sustainable development through model Development Control Plans, and support community initiatives towards reducing emissions. Councils are well-placed to coordinate efforts between residents, businesses, and workers within their LGA to move towards reducing emissions[3].

Lake Macquarie's Current Emissions Profile

Lake Macquarie City's Environmental Sustainability Strategy and Action Plan 2020-2027 details the planning management action to *"Investigate and implement energy efficiency and emissions reduction measures, and renewable energy opportunities, across the City for public, commercial and residential Developments."* Furthermore, it states that Lake Macquarie City has a 2027 target of a *"57% reduction in City-wide per capita greenhouse gas emissions from 2007 baseline"*[4].

In the baseline year, city-wide total greenhouse gas (GHG) emissions were estimated to be 4,869,761 t CO2-e and a city population of 194,997[5] (25.0 t CO2-e per capita). By 2023/24, total GHG emissions had reduced to an estimated 3,592,200 t CO2-e with a population that had grown to 218,965 (16.4 t CO2-e per capita), a per capita reduction of only 34.3% from the baseline. It is expected that the 57% target by 2027 will not be reached.

Lake Macquarie City's Greenhouse Gas Emission Reduction Targets Policy specifies a 3% per annum reduction in greenhouse gases from the City's emissions (measured on a per capita basis)[6]. However, Greenhouse gas emissions in the Lake Macquarie LGA have

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[3] Department of Planning, Industry and Environment. (2020), Net Zero Emissions Guidance for NSW Councils. Helping councils plan for a low emissions future. Retrieved 10 June 2026, from https://www.energy.nsw.gov.au/sites/default/files/2022-08/2020_05_NSW_NetZero_EmissionsGuidance.pdf

[4] Lake Macquarie City Council. (2020) Together Lake Mac, Our Plan for a Sustainable City, Environmental Sustainability Strategy and Action Plan 2020-2027. Retrieved 15 June 2026, from https://www.lakemac.com.au/files/assets/public/hptrim/project-management-environmental-management-projects-pm180003-2018-review-environmental-sustainability-policy-and-2014-2023-environmental-sustainability-action-plan/pm180003-public-exhibition-environmental-sustainability-strategy-and-action-plan-2020-2027/final-low-resolution-environmental-sustainability-strategy-and-action-plan-2020-2027-ratified-at-22-june-2020-council-meeting.pdf

[5] Lake Macquarie City Council. (2012) Lake Macquarie Energy Resilience Strategic Plan. Retrieved 15 June 2026, from https://www.lakemac.com.au/files/assets/public/hptrim/environmental-management-programs-climate-change-energy-resilience-plan/lake-macquarie-energy-resilience-strategic-plan-final-july-2012.pdf

[6] Lake Macquarie City. (2020). Council Policy. Greenhouse Gas Emission Reduction

flatlined over the past two years, with only an approximate 0.2% per capita reduction in 2023/24.[7]

Total emissions actually increased slightly by 0.5% in 2023/24, with emission levels across most sectors remaining static. Emissions from the housing sector were also static over this period with a 0.5% increase in 2023/24. Approximately 11% of emissions in the Lake Macquarie LGA are attributed to the housing sector. However, emissions from home vehicle use are not included in this estimate. If you include vehicle emissions it dramatically changes the mix of emissions for households. Looking at average Australian household emissions, vehicles have the largest proportion of household emissions at 38% followed by electricity at 32%[8]. Vehicle use (excluding freight and public transport) currently represents approximately 10% of emissions in Lake Macquarie LGA and emission levels remain static.

Housing planning is one of the most powerful tools we have to reduce greenhouse gas emissions at a local government level. By shaping the types of homes we build and their locations, we can create more sustainable neighbourhoods, boost the environmental performance of housing, and ensure our homes stay comfortable and resilient as the climate shifts.

Housing Design - Sustainability

The strategy recognises community support for environmentally conscious development:

> "Residents want environmentally conscious development that preserves green spaces and promotes sustainable living."[9]

We acknowledge the strategy's inclusion of urban-planning sustainability measures such as:

- **Urban heat mitigation** through tree canopy and green space:

  "Higher-density neighbourhoods are designed to reduce urban heat and improve comfort, resilience and liveability."

- **Avoiding development in high ecological value areas**

  "Urban expansion into high value ecological and environmental land is avoided."

Targets. 30 November 2020. Version 4. Retrieved 15 June 2026, from https://www.lakemac.com.au/files/assets/public/v/3/hptrim/environmental-management-policy-protection-of-the-environment-policies-pep-greenhouse-gas-emission-reduction-targets/greenhouse-gas-emission-reduction-targets-council-policy-version-4.pdf

[7] Ironbark Sustainability and Beyond Zero Emissions. (2026). 2025 Snapshot emissions profile – Ironbark Sustainability and Beyond Zero Emissions. Snapshot. Retrieved 10 June 2026, from https://snapshotclimate.com.au/

[8] Griffith, S. (2022). *The Big Switch: Australia's electric future*. Black Inc.

[9] Lake Macquarie City. (2026). Draft Housing Strategy. Retrieved 10 June 2026, from https://shape.lakemac.com.au/housingstrategy

- **Liveability improvements** (public spaces, walkability, cooling, amenity).

However, the strategy needs to seek to improve housing resilience and sustainability. The strategy should be amended to include the objectives that Housing promotes resilience and meets high-sustainability performance targets.

Planning for Housing Resilience

Good design helps households make everyday choices that lower energy use and emissions. It supports things like buying efficient appliances, using smart tech, switching to EVs, choosing active transport, and reducing waste through better recycling and on-site composting.

Under the priority to "Prioritise liveability in a changing city" the strategy should be amended to include sustainable and resilient design. It is essential that we build homes that use less energy and create neighbourhoods that can better handle the challenges of a changing climate. In addition to the impact on the environment, improving resilience has implications for the quality of life for residents.

Increasing resilience of housing is a recent focus of both state and federal governments. Changes in state and federal policies have contributed to improved efficiency within new homes, resulting in lower energy use and reduced energy bills for residents. Council should advocate for higher BASIX standards in new developments, such as for medium density housing. It's a simple way to cut emissions, save water and strengthen our community's resilience to climate change.

Accompanying these changes, the Council can drive new sustainable development through Development Control Plans (DCP) and help encourage more sustainable living by supporting things like energy efficiency standards and guidelines, rooftop solar and storage battery-ready design, EV-ready infrastructure, sustainable design including reverse cycle air conditioning and heat pumps, cool building materials, green infrastructure and embedding passive design principles to keep neighbourhoods cooler. We can also promote the use of locally sourced sustainable building materials, the use and re-use of recycled materials, reduce embodied energy, and help encourage the use of new, more efficient construction methods and equipment. We can make space for canopy trees and landscaping, improve the quality and reduce the quantity of stormwater by incorporating water sensitive urban design, such as provision of permeable surfaces and use of rainwater for toilets, and support gas-free, all-electric homes. We can also provide support for efficient and active modes of transport, for example by providing space for bicycle storage and shared vehicles and the ability to charge electric vehicles.[10] Sustainable design doesn't just improve environmental performance, it also lowers energy bills and creates healthier, more comfortable homes.

[10] City of Darebin. (2025). Darebin Housing Strategy. https://www.darebin.vic.gov.au/files/assets/public/v/1/planning-and-building/documents/darebin_housing_strategy_august_2025.pdf

Importantly, the strategy needs to commit the Council to reviewing its DCP provisions to ensure these meet best practice.

Case Study: Support for gas-free, all-electric homes

This would be achieved by Lake Macquarie City amending its planning rules (DCP) to discourage gas connections and gas appliances in all new developments for health, and economic reasons.[11]

All-electric buildings avoid unnecessary gas infrastructure, reduce indoor air pollution, and deliver lower running costs:

- New developments are gas-free by default.
- Community health improves through reduced exposure to NO_2 and other pollutants.
- Households and businesses save money — the NSW Government estimates $2,771 per year in savings, or $4,000 with solar.
- The city's growth aligns with its climate strategy and net-zero trajectory.

For larger developments, using a competitive design process for big developments is a great way to lift the quality of urban design and ensure residents benefit from better amenity and sustainability.

Research makes it clear that we need stronger sustainability standards for urban development, and better policy tools to support sustainable housing at the neighbourhood scale. It also recommends shifting to performance-based expectations, supported by clear objectives and targets, so we can measure what's working and compare outcomes across different projects.[12]

Transit Oriented Development and Low and Mid-Rise Housing Policy

Transport oriented development (TOD) is all about creating neighbourhoods where people can easily walk to public transport. When more homes and services are built around transport hubs, it becomes easier to choose the bus, train, walking or cycling over driving. That means fewer emissions and better transport options for everyone. Research also tells us that denser cities generally produce fewer housing-related emissions, both in construction and day-to-day living.[13]

Residents need proximity to jobs and schools to reduce commuting costs. Developers seek these locations because proximity to transit often unlocks higher density zoning bonuses and

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[11] Roberts, A. (2026, June 14). Gas-free new homes and businesses for Lake Mac. *News.* https://www.cleanas.org.au/news/gas-free-new-homes-and-businesses-for-lake-mac

[12] Dühr, S., Berry, S. and Moore, T. (2023). Sustainable housing at a neighbourhood scale. From the AHURI Inquiry: Informing a strategy for circular economy housing in Australia. Final Report No. 396. https://www.ahuri.edu.au/research/final-reports/396

[13] iMove. (2025). Low-carbon transit-oriented development precincts. https://imoveaustralia.com/project/low-carbon-transit-oriented-development-precincts/

lowers mandatory parking requirements, saving construction costs. Access to transport and services benefits both.

NSW Government planning reforms for Transport Oriented Development will increase the capacity for more mid-rise housing and mixed-use development within 400 metres of railway stations over the next 15 years delivering much needed housing around transport hubs. This in turn will increase the viability of public transport to these locations and provide greater incentive for improved services.

Within the Lake Macquarie LGA, this includes the locations of Cardiff, Booragul, Teralba and Morisset stations. Cockle-Creek was originally included but now states that it is an "*Alternative scheme under assessment*".[14]

What will the alternative scheme for Cockle-Creek entail (assuming that it is council led)? The Hunter Regional Plan states that over the next 20 years, the area east of Cockle Creek is set to grow, with around 10,000 new residents, more than 4,000 new homes and space for about 6,000 new jobs. Planning for this growth will focus on getting the right mix of housing densities, supporting new types of employment, improving open spaces and local centres, and making sure the right state and local infrastructure is in place to support a thriving community.[15]

The NSW Government will establish inclusionary zoning around these TOD locations to deliver affordable housing close to jobs, recreation, amenities, and services. We welcome these reforms as TODs will decrease the need for cars and increase patronage of public transport and active transport use which will lead to better health outcomes and reduced GHG emissions.

However, a paltry mandatory minimum 2% affordable housing contribution will apply to all new developments equalling 2000 square metres total gross floor area in these areas. This is in no way sufficient in addressing the housing crisis affecting low-income residents in our community. Furthermore, it is unclear how this applies to in-fill developments within these areas where the 2% affordable housing contribution also applies.

The Strategy says that mandatory affordable housing contributions in TOD areas make projects less feasible. Contributions don't really make a project unworkable; they mainly reduce how much a developer can pay for the land. Developers usually start with what they think the finished homes will sell for, then subtract all their costs and profit. What's left is what they think the land is worth. Feasibility only becomes an issue if the land price ends up higher than what developers think it's worth.

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[14] Department of Planning, Housing and Infrastructure. (2026). Transport Oriented Development. https://www.planning.nsw.gov.au/policy-and-legislation/housing/transport-oriented-development-program/transport-oriented-development

[15] NSW Department of Planning and Environment. (2022). Hunter Regional Plan 2041. https://www.planning.nsw.gov.au/plans-for-your-area/regional-plans/hunter-regional-plan-2041

All land to be developed for housing at the Transport Hubs must prioritise the delivery of a public benefit, not the delivery of profit.

Beyond the TOD areas, the Low and Mid-Rise Housing Policy also kicks in within 800 metres of major town centres and transport hubs in Lake Macquarie — including Morisset, Belmont, Jewells, Boolaroo, Cardiff and Charlestown. We're not sure why Toronto missed out, because it seems to meet the same criteria.

This change will support more housing diversity and help meet the strong demand for medium-density homes. The benefits are similar to TODs: more homes close to shops, services and transport, and more walkable, sustainable neighbourhoods.

The strategy mentions that this policy will boost affordable housing through mandatory contributions. It would be useful to confirm whether this refers to the 10–15% affordable housing allocation required for in-fill developments in these designated areas.

Affordable housing

The Lake Macquarie LGA does have more social housing than the NSW average, but much of it is ageing stock from the 1960s and 70s. These older cottages no longer suit the number of people needing housing or the different needs of low-income households.[16]

The strategy recognises the need for more affordable housing and includes:

- A priority to *"Facilitate affordable housing"* (Priority 3).
- Support for redevelopment of existing social housing stock:
  > *"There is an opportunity to improve affordability outcomes by renewing and redeveloping about 3,100 social housing dwellings owned by Homes NSW."*
- Acknowledgement of low social housing supply (4.2% of stock) and long wait times.
- Recognition that mandatory affordable housing contributions apply only in State-led TOD areas (2% of floor area).

However: the strategy has no strong social or affordable housing requirements. For example the strategy does not propose any new local affordable housing contribution scheme or inclusionary zoning. Other best practices in this area include council-led delivery or partnerships and land-use incentives tied to affordable housing outcomes.

The Council can play a direct role by identifying any suitable Council-owned infill sites that could be used for new social and affordable housing, and then move quickly to tender these sites for development by a community housing provider. This would help deliver the affordable rental homes that low-income households urgently need.

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[16] Pacific Link Housing. (2025). The State of Affordable Housing in Lake Macquarie 2025. https://www.pacificlink.org.au/wp-content/uploads/2025/05/State-of-Affordable-Housing-in-Lake-Macquarie-2025-WEB.pdf

It is noted that the strategy supports smaller, diverse housing types:

> *"Smaller dwellings typically have lower construction and purchase costs… an important component of improving housing affordability."*

However, this is a supply-side affordability measure, not a social housing policy.

We welcome residential development where it delivers affordable and secure housing to the community.

However, strategic planning must consider the actual or most likely amount and mix of affordable and social housing to be in a planning precinct. For example, Housing Minister Rose Jackson committed to the delivery of 30% affordable and social housing on state-government owned land as part of the rezoning at Hunter Park. Any government-owned land that's developed should deliver a minimum of 30% social and affordable housing, guaranteed permanently.

Furthermore, the Strategy makes no mention of requirements for affordable housing or any target for Affordable Housing. The City of Newcastle Housing Policy includes an overall affordable housing target of 15% to work towards, across the city that is monitored using benchmarks for affordable housing, housing diversity and homelessness. The City of Sydney has a target 7.5% of housing will be affordable rental housing and 7.5% will be social housing.[17] Council should set ambitious but realistic timeframes for delivering its affordable housing targets, and make sure progress is regularly monitored and publicly reported.

In fact, with respect to housing affordability the strategy explicitly states:

> *"Local government is not equipped to take on that responsibility."*

This is a policy position, but it leaves Lake Macquarie behind best-practice councils that do use planning powers to secure affordable housing.

To be effective, the Strategy needs a much clearer roadmap for how everything will be delivered. This includes outlining specific actions, who will lead them, who the partners are, when things will happen and how progress will be measured and reported. In particular, the performance measures are very broad, which makes it difficult to understand how success will be tracked over time.

Thank you for considering our submission,

Sincerely,

Alec Roberts

CLEANaS Chair on behalf of CLEANaS

[17] City of Sydney. (2020). Housing for All. City of Sydney Local Housing Strategy. https://www.cityofsydney.nsw.gov.au/strategic-land-use-plans/local-housing-strategy