# Residential Land Supply & Demand Analysis

Planning Proposal for the Elambra West Urban Release Area

Prepared for Pearce & Campbell and Waterford Farms Pty Ltd

Site address Lot 2 DP 1168922, No. 48 Campbell Street, Gerringong Lot 11 DP 1045242, No. 86 Campbell Street, Gerringong

Date 16 January 2020

# allen price & scarratts pty ltd land and development consultants

Surveying



Civil Engineering F









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### **1. INTRODUCTION & BACKGROUND**

Allen Price and Scarratts (APS) has been engaged to assess the adequacy of residential land supply at Gerringong and the immediate surrounding area to determine whether there is a justifiable need to rezone and provide an extension of residential zoned land west of Elambra Estate, Gerringong. Our clients are Pearce & Campbell and Waterford Farms P/L who are the owners of land immediately west of Elambra Estate which currently operates as farmland.

As explained in this document, the Elambra West Planning Proposal site has been identified to facilitate expansion of the Gerringong township in the Kiama Urban Strategy 2011 and the Gerringong Charrette 1995. These documents can be viewed on Kiama Municipal Council (KMC) website at <a href="https://www.kiama.nsw.gov.au/planning-and-development/strategic-planning/policies-strategies">https://www.kiama.nsw.gov.au/planning-and-development/strategic-planning/policies-strategies</a> and are discussed later in this document.

Recognising the potential of the site, and to meet anticipated community needs, future residential use of this site will focus on the provision of housing which is aimed at:

- First home buyers;
- Ageing in place purchasers;
- People downsizing their residence;
- Retaining families in close proximity to the existing urban area; and,
- People relocating to regional / coastal areas.

The analysis supporting this report involves reviewing :

- anticipated population growth;
- anticipated dwelling demand;
- current land / dwelling stock;
- available "green field" zoned residential land;
- timing of available "green field" zoned residential land for release to market; and,
- strategic setting influencing residential land zoning.

In preparing this report, the following information has been considered:

- Kiama Local Environmental Plan (KLEP) 2011;
- KMC Community Profile (Remplan);
- Australian Bureau of Statics (ABS) information;
- Kiama Urban Strategy 2011;
- Gerringong Charrette 1995;
- Illawarra Shoalhaven Regional Plan 2015; and,
- Land supply from local real estate industry.



### 2. GERRINGONG AND SURROUNDS CONTEXT

The coastal township of Gerringong is approximately 10km south of Kiama and 3.6km north of Gerroa. At the 2016 census, Gerringong had a population of 3,966 people.

The town in general is bordered by the ocean to the east, Werri Beach / Lagoon to the north, Princes Highway/Illawarra Railway to the west and the southern edge of the existing Elambra Estate. Rural land is both to the east and west of Elambra Estate.

According to Remplan information available on KMC website, the main employment / economic base of Gerringong and surrounds largely relies on:

- Accommodation & Food Services;
- Construction;
- Health Care & Social Assistance;
- Retail Trade; and,
- Education & Training.

Whilst it is recognised that agriculture has in the past been a key industry for this area, overtime the reliance and growth of this industry has diminished. A separate expert report addresses this matter.



Figure 1 – Locality image of Gerringong township (Source SIXMaps)



### 3. PLANNING PROPOSAL CONTEXT

The Planning Proposal site is located immediately adjacent to Gerringong and approximately 1.2km via the road network to the town centre.

As shown in the images below, the site is approximately 71.46ha in area, generally cleared, zoned RU2-Rural Landscape and is made up of the following lots:

- Lot 2 DP 1168922; and,
- Lot 11 DP 1045242.

Current legal access to Lot 2 DP 1168922 and Lot 11 DP 1045242 is from the north of the site via Campbell Street. Lot 11 has legal access across Lot 2, via a Right of Access.

The URA is largely bordered to the east and north by land zoned R2 – Low Density Residential which has a minimum lot size of 450m2. The land to the west and south of the URA is zoned RU2-Rural Landscape.



Figure 2 - Aerial image showing approximate location of site (Source SIXMaps)



Whilst only to be used as a guide to identify site potential, initial scoping investigations indicate an approximate lot yield of approximately 317 residential lots. Developable land is limited by the flooding potential on parts of the site. It is anticipated the site will be developed in a number of stages and in a similar form to that of the adjacent Elambra Estate.



Figure 3 – Existing Land Use Zoning (Kiama LEP 2011 mapping)

### 4. POPULATION GROWTH / DWELLING DEMAND

In recognition of Gerringong's relatively easy access to population centres of Wollongong and Sydney by train and vehicle, the township has experienced steady population and dwelling growth. ABS data indicates that in Gerringong in 2011 there were 3,456 people and 1,423 dwellings and in 2016 there were 3,966 people and 1,686 dwellings. Although, as shown in Appendix C, the ABS Data Collection Area for Gerringong did increase slightly for the 2016 census period to include some surrounding rural areas / houses which would result in minor related increases. Also, neither data sets for 2011 and 2016 include specific population / dwelling information for Werri Beach or adjacent Gerroa. This growth can be attributed to land release in the adjacent Elambra Estate from 2003.

Whilst considered a part of the Gerringong township, Werri Beach is a separate census data collection area and ABS data indicates that in 2011 there were 541 people and 311 dwellings and in 2016 there were 562 people and 301 dwellings. Whilst population growth occurred between these census periods, it is difficult to accurately conclude why dwelling numbers declined with a relatively small data sample.



Overall, the above statistics for Gerringong indicate that over a 5 year period (2011 to 2016) the occupation per dwelling has remained consistent at 2.6 persons per dwelling. During this 5 year period, dwelling numbers also increased by 213 from 1,473 to 1,686 which equates to 14 % growth. When comparing Gerringong to the larger and overall Kiama Local Government Area (LGA) (which includes Gerringong) for the same ABS period, the dwelling increase was 538 (9,402 to 9,940) which equates to 5% growth. Therefore, Gerringong has strong demand for residential growth when compared to the larger overall Kiama LGA.

ABS data from 2011 to 2016 also notes the number of unoccupied dwellings has decreased from 235 to 218 in Gerringong which indicates further preferred permanent residential occupation and less holiday dwellings in the town.

### 5. DWELLING LAND / DWELLING STOCK

When preparing this report approximately 21 residential dwellings (according to Domain – See Appendix D) in the form of apartments, units, flats, townhouse, villa and houses were available for purchase in November 2019. This residential stock available for purchase equates to less than 1% of the 1987 dwellings estimated in Gerringong and Werri Beach by ABS data in 2016.

Only one vacant site (zoned B2 – Local Centre ) for mixed use development and located centrally in the township was available for purchase in November 2019. The related site area is 1,190m<sup>2</sup> and current Development Consent allows for construction of 7 residential units, 3 serviced apartments and 280m<sup>2</sup> of commercial space.

No vacant land primarily for the purpose of residential use was found.

The above findings are consistent with feedback from local real estate agents.

In general, opportunities for new and/or additional residential dwellings can only be achieved through the process of renovating or demolishing existing dwellings which contribute to associated intense land use.

The above findings alone indicate demand for new land supply in Gerringong.

### 6. AVAILABLE LAND & SUPPLY TIMING

As outlined in the Kiama Urban Strategy 2011, the Community Panel involved in overseeing this document predicted that Gerringong green field development supply (i.e. new land release area) would be provided by Elambra Estate to 2021. As shown in the below aerial image of Elambra Estate, and information above, available land supply can be expressed as "exhausted" with potentially less than 5 lots not developed and development of these sites could be pending individual landowner preference and/or investors banking on land supply shortages pushing up land values.





Figure 4 - Aerial image demonstrating available land supply in Elambra Estate (Source SIXMaps)

When analysing and comparing current land zoning and aerial images as shown below, the available residential zoned land (shown in pink) could also be explained as "exhausted" with few lots not developed and additional dwelling growth relying on in-fill from subdividing and/or demolishing existing dwellings on larger lots.



Figure 5 - Plan (KLEP) 2011 - Land Zones

Figure 6 – Gerringong aerial image (Source SIXMaps)





Figure 7 - Plan (KLEP) 2011 - Minimum Lot Size

As shown in the above minimum lot size image, current additional residential opportunities can only be achieved by increasing dwelling density on the remaining large lots in Gerringong which are generally in excess of 900m<sup>2</sup> and have existing dwellings. As outlined above, increased density can only really be achieved through renovating or demolishing existing dwellings. This outcome will likely increase the number of battle axe lots within the town's residential areas.

Timing of such infill land release is purely driven by individual / market demand and no co-ordinated or timely release mechanism is applied. Future available "green field" zoned residential land has the ability to offer certainty of co-ordinated and potentially timely release of additional residential growth in Gerringong.

It is recognised that demand for land from the Elambra Estate has been under-estimated by some 5 years. Therefore, there is also a growing trend for the smaller lot offerings (i.e. 450m<sup>2</sup>) and in general large lots are being subdivided to provide these smaller lot outcomes.

The opportunity to increase vacant residential land supply in Gerringong and to provide possibly more housing options can be achieved by the Planning Proposal to change land zoning. The Planning Proposal to change land zoning of the Elambra West site will take some years to achieve and subsequent years to construct. As the Planning Proposal process is still in the preliminary stages, timeframes are difficult to estimate. However, if supported, it is possible for related on ground works to commence within 5 years of receiving Planning Proposal approval.



### 7. STRATEGIC SETTING REVIEW

The following section reviews the key strategic frameworks influencing residential land zoning in Gerringong.

### Illawarra Shoalhaven Urban Development Program Update 2018

The Illawarra-Shoalhaven Urban Development Program (UDP) is the State Government's program for managing land and housing supply in the Illawarra. The UDP monitors the planning, servicing and development for new urban areas in Wollongong, Shellharbour, Kiama and Shoalhaven as well as the provision of housing in existing urban areas. Whilst this report is a stand-alone document, it can also be read in conjunction with the Illawarra - Shoalhaven Regional Plan. This report enables the Department of Planning, Industry and Environment to:

- Monitor take up rates, land supply and dwelling production;
- Coordinate release and rezoning of land; and
- Strategically plan to ensure the sustainable supply of housing to meet the Region's needs.

This Update Report is based on information gathered during the annual developer forum held in 2016 and 2017, which was attended by Sydney Water, Councils, and relevant developers to discuss historical housing supply and forecast lot production. It provides the estimates of land supply as at the end of financial year 2016/17 and short-term forecasts until 2021/22.

Key points from the data shown in this report indicates:

- Available new release land appears to be in short supply in the Kiama LGA since 2012/13, when dwelling completions fell after peaking at 89 to an average of 23 per year to 2016/17. At the same time in-fill dwelling completion was 77 and continued to grow to an average of 81 per year to 2016/17.
- Dwelling approvals in the Kiama LGA reached a ten year high in 2015/16 with 210 approvals.
- Detached dwellings (likely higher outcome on greenfield sites) is preferable over multi-units int the Kiama LGA.
- The proportion of multi-unit approvals in the Kiama LGA has increased over the last ten years, accounting for 18% in the first five years to 2011/12 then increasing to 38% of all approvals for the last 5 years (2012/13 to 2016/17) which could be attributed to limited greenfield land available.
- The greenfield dwelling potential in Elambra Estate, was exhausted in 2016/17 with the construction of the final subdivision stages and registration of lots.
- Only 86 greenfield residential lots are zoned for potential release to service the whole Kiama LGA.
- Average dwelling completions for the last 20-years is 143 per annum which is an indication of a strong local housing market in the Kiama LGA.
- High infill dwelling development in the Kiama LGA is a reflection of the limited capacity for greenfield housing.
- Greenfield dwelling forecasts have identified potential supply of 617 future lots for the whole Kiama LGA of which more than have (350 dwellings) are identified at Elambra West.
- Elambra West has capacity within the water and wastewater systems as well as electricity network for servicing and presents an additional housing opportunity if required.



### Illawarra – Shoalhaven Regional Plan 2015

The Illawarra-Shoalhaven Regional Plan applies to the local Government areas of Kiama, Shellharbour, Shoalhaven and Wollongong which has been developed by the NSW State Government. The Plan articulates the vision for the Illawarra-Shoalhaven region (including Gerringong) to be:

...a sustainable future and a resilient community, capable of adapting to changing economic, social and environmental circumstances.

A key goal of the Plan (No.2) is achieving, "A variety of housing choices, with homes that meet needs and lifestyles". This goal goes further to state a corresponding Direction (2.2) to "Support housing opportunities close to existing services, jobs and infrastructure in the region's centres making more housing available in existing urban areas is a sustainable option because it takes advantage of existing job markets, infrastructure, commercial and retail opportunities, public transport, and facilities for pedestrians and cyclists.

Centres identified as the focus for increased housing activity (see Figure 10) include the: Northern corridor – Thirroul, Corrimal and Fairy meadow; West lake Illawarra corridor – Figtree, Unanderra, Dapto and Oak Flats; east lake Illawarra corridor – Warrawong, Warilla and Shellharbour Centre; metro Wollongong; and Southern centres – Kiama, **Gerringong**, Berry, Nowra-Bomaderry, Huskisson and Ulladulla.

Action 2.2.1 is to investigate the policies, plans and investments that would support greater housing diversity in centres and "analysis has identified locations in centres such as Thirroul, Corrimal, Oak Flats, Kiama, **Gerringong** and Nowra-Bomaderry where a wider range of housing options are feasible, and where changes to planning controls could facilitate this outcome."

Based on analysis of the above Regional Plan, Gerringong is identified at the state government level to provide land supply for future housing demand. This plan is more current than the 1995 Gerringong Charrette and 2011 Kiama Urban Strategy

#### Kiama Urban Strategy 2011

The Kiama Urban Strategy identifies part of the site for proposed residential use, being Lot 2 DP 1168922 (formerly Lot 10 DP 1045242) and outlined in the mapping extract shown in Attachment A. In terms of forecasting residential land supply at Gerringong, and the immediate surrounding area, the document makes the following related points:

- The appointed Community Panel in June 2005 examined what level of population growth is appropriate for Kiama over the next ten years and how it can be housed. However, as indicated this supply in Gerringong has now been exhausted for some time.
- The appointed Community Panel concluded that housing needs were not expected to exceed the conservative IRIS estimate of 100 to 150 per annum. However, it is noted that KMC's Dwelling Approvals figures from 2015/16 to 2018/19 have ranged annually from 138 to 210.
- Forecasted population projections were predicted in the following ranges

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	Year	Projections	Census estimates
	2011	21,000 – 21,980	19,986 (9,402 dwellings)
	2016	22,390 - 22,760	21,464 (9,940 dwellings)
	2021	23,079 – 23,430	



- The estimated population for Kiama in 2018 was 23,006, indicating that above forecasts will be reached prior to their predicted timeframe.
- Housing affordability has been identified as a significant issue for Kiama as identified in the *Kiama Municipal Council Community Profile (Remplan) (Source KMC website).*

In summary, the Kiama Urban Strategy has not kept pace with land supply and demand.

### Illawarra Regional Strategy 2006-31

The PP is consistent with the Illawarra Regional Strategy. The Strategy applies to the local government areas of Kiama, Shellharbour and Wollongong, and is one of a number of regional strategies that have been prepared for high growth areas in NSW. The Strategy forecasts the need for 38,000 additional new dwellings for the period 2006-31 for the Kiama, Shellharbour and Wollongong areas. For Kiama, new residential growth is identified in Gerringong that will be determined by Kiama Council in consultation with the Department of Planning. Key factors that will influence the location of urban development at South Gerringong will include its extensive coastal landscape values, and the importance of maintaining Gerringong and Gerroa as separate urban areas.

Key neighbourhood planning principles informing locations for residential growth include:

- Public transport networks that link frequent buses into the rail system.
- A range of land uses to provide the mix of houses, jobs, open space, recreational space and green space.
- Easy access to major town centres with a full range of shops, recreational facilities and services along with smaller village centres and neighbourhood shops.
- Jobs available locally and regionally, reducing the demand for transport services.
- Streets and suburbs planned so that residents can walk or cycle to shops and other activity spaces for daily needs.
- A wide range of housing choices to provide for different needs and different incomes. Traditionally houses on their own block will be available along with smaller, lower maintenance homes, units and terraces for older people and young couples or singles.
- Conservation lands in and around the development sites, to help protect biodiversity and provide open space for recreation.

A key Strategy action is "An appropriate growth area for the southern expansion of Gerringong will be identified with the Illawarra Urban Development Program and zoned appropriately."

#### Gerringong Charrette 1995

The Gerringong Charrette 1995 identifies almost the majority of the site for proposed residential use which is outlined in the mapping extract shown in Attachment B. In terms of forecasting residential land supply at Gerringong and the immediate surrounding area, the document makes the following related points:

- Estimated 4% annual population growth with a population of 7,730 people in the year 2020.
- South expansion estimated at providing 792 dwellings (44 ha at 18 dwellings per ha).

In summary, the Gerringong Charrette provides a solid foundation and vision for the Gerringong township, and has played a significant role in the development outcomes, land supply and related community / business development.



### 8. OTHER CONSIDERATIONS

A number of issues emerge from the assessment of supply and demand contained in this report that are summarised below:

- mismatch between forecasts and actual growth;
- need to maintain a competitive land development market which allows for entry to first home buyers i.e. young families;
- forecasts and strategic plans predict trends and rarely reflect the reality on the ground;
- importance of maintaining a competitive market and growth that provides choice and variety in the housing market;
- supply is ultimately dependent upon the rate of growth;
- affordability of housing is an important competitive advantage;
- supply of available land helps to limit price growth and making housing choice more affordable;
- inadequate supply will facilitate the tightening land supply conditions caused by unexpected surges in demand; and
- higher lot prices are inevitably borne by the home buyer, and by extension, the local economy.

Whilst not a primary factor in this analysis, the following table outlines the current market consideration for potential residential buyers in Gerringong.

## Suburb Profile Report For Gerringong NSW (2534)

Gerringong House: Median price \$876,250, Annual capital growth 7.73%, Number of sales 52, Weekly median advertised rent \$570

Gerringong Unit: Median price \$666,000, Annual capital growth 5.93%, Number of sales 10, Weekly median advertised rent \$450



Source: Monthly data update for Sep 2019 as supplied by CoreLogic. Data is reported to the period ending Jun 2019. Please note that property sales data is routinely updated, so may change retrospectively. Source <a href="https://www.yourinvestmentpropertymag.com.au/top-suburbs/nsw-2534-gerringong.aspx">https://www.yourinvestmentpropertymag.com.au/top-suburbs/nsw-2534-gerringong.aspx</a>



Consideration should also be made to the influence of possible residential land release current Planning Proposals being assessed by KMC. At the time of writing this report, the following Planning Proposal were being considered by KMC:

Planning Proposal	Comment
Rezone and Reclassify block on Irvine Street, Kiama. Relates to rezoning Lot 12 DP 708075, Lots 36 & 45 DP 263449 and Lot 38 DP 630551 from RE1 Public Recreation to R2 Low Density Residential	Rezoning site located in central Kiama area and its outcome (if approved) is unlikely to significantly influence land supply and demand in Gerringong.
<ul> <li>Rezone and Reclassify part of Iluka Reserve, Kiama</li> <li>Downs. Relates to rezoning Part Lot 34 DP 28122 and</li> <li>Part Lot 243 DP 30200 from</li> <li>part community to operational land;</li> <li>part RE1 Public Recreation to R2 Low Density</li> <li>Residential; and</li> <li>part R2 Low Density Residential to RE1 Public</li> <li>Recreation.</li> </ul>	Rezoning site located in central Kiama Downs area and its outcome (if approved) is unlikely to significantly influence land supply and demand in Gerringong.
Rezone Lot 3 Dido Street, Kiama. Related to rezoning Lot 3 DP 1018217 from RU1 Primary Production to R2 Low Density Residential	Rezoning site located on the western edge of Kiama and its outcome (if approved) is unlikely to significantly influence land supply and demand in Gerringong.
Introduce development standards for dual occupancy and multi dwelling housing development. Related to make LEP amendment to introduce development standards for dual occupancy and multi dwelling housing development.	This change of standards for dual occupancy development is unlikely to influence demand for green field land release areas.
Rezone part of Lot 2 Dido Street, Kiama. Relates to rezoning a portion of Lot 2 DP 805229 from RU2 Rural Landscape to R2 Low Residential.	Rezoning site located on the western edge of Kiama and its outcome (if approved) is unlikely to significantly influence land supply and demand in Gerringong.
Rezone South Kiama. Relates to rezoning land south of Saddleback Mountain Road, north of Weir Street and to the west of and immediately adjacent to the Princes Highway, Kiama (Lot 1 DP 707300, Lot 5 DP 740252, part of Lot 102 DP 1077617 & part of Lot 8 DP 258603)	Whilst not supported by KMC, this rezoning site located on the south-western edge of Kiama and its outcome (if approved) could influence land supply and demand in Gerringong. However, at this stage it is not clear if this proposal will be approved in current format.
Rezone Lot 2 Dido Street, Kiama. Relates to rezoning Lot 2 DP 1018217- from RU2 Rural Landscape to R2 Low Residential and R5 Large Lot Residential.	Rezoning site located on the western edge of Kiama and its outcome (if approved) is unlikely to significantly influence land supply and demand in Gerringong.
Rezone Council's Administration Centre and increase permissible height at old retirement village component of 2 Havilah Place Kiama. Relates to rezoning Lot 100 DP 635688 - 11 Manning Street Kiama (i.e. Council's Adminstration site) from SP2 Special Purpose to B2 Local Centre and part of Lot 71 DP 831089 - 2 Havilah Place Kiama to facilitate a seven (7) storey building on the site.	Rezoning site located in central Kiama area and its outcome (if approved) is unlikely to significantly influence land supply and demand in Gerringong.



### 9. CONCLUSION

The findings of this residential land supply and demand analysis at Gerringong conclude that current land supply is not adequate to meet current needs. Strategic supply analysis identifies available land for release which forms the Elambra West Urban Release Area which is potentially overdue and associated land supply shortage is influencing market choices.

Key factors driving demand for land release in Gerringong include:

- steady population growth;
- demand to live in such a coastal location;
- preference for green field development over infill development;
- limited feasible areas / opportunities for infill development;
- proximity and improved travelling options to Wollongong & Sydney;
- limited vacant land supply on the market;
- Gerringong Charrette 1995 forecasting further residential land supply at Gerringong;
- predicted land supply in Kiama Urban Strategy 2011 is exhausted for Elambra Estate;
- dwelling forecasts are higher than those predicted in the Kiama Urban Strategy 2011;
- Illawarra-Shoalhaven Regional Plan 2015 identifying Gerringong to provide future land and housing supply;
- land supply in the Kiama LGA is already identified in supporting strategies (via Planning Proposal process) can be re- zoned to reduce current demand;
- Available new release land in the Kiama LGA appears to be in short supply since 2012/13 and greenfield dwelling potential in Elambra Estate, was exhausted in 2016/17;
- dwelling approvals for the Kiama LGA in general are increasing every year;
- only 86 greenfield residential lots are zoned for potential release to service the whole Kiama LGA;
- average dwelling completions for the 20-years is 143 per annum is an indication of a strong local housing market in the Kiama LGA;
- high infill dwelling development in the Kiama LGA is a reflection of the limited capacity for greenfield housing; and
- greenfield dwelling forecasts have identified potential supply of 617 future lots for the whole Kiama LGA of which more than have (350 dwellings) are identified at Elambra West.

The Elambra West Planning Proposal which an estimated 317 residential lots offers KMC and the surrounding/wider community the opportunity to deliver residential land opportunities to meet current supply shortfall. Ideally, the site proposed will be integrated as much as possible into the existing development footprint which forms Elambra Estate and the adjacent Gerringong township.











#### **APPENDIX B – Key extracts from Gerringong Charrette 1995**



#### APPENDIX C – ABS Gerringong Data Collection Areas / Quickstats



### 2016 Census

Australian Bureau of Statistics			QSearch		
	Statistics	Census	Complete your survey	About us	

ABS Home > Census > Quickstats

#### 2016 Census QuickStats

Australia   N	lew South Wales   State Suburbs		Quick Stats Search	Enter a location GO
Gerr	ingong			
Code SSC1				Kiama
	a Community Profile		+	
			Saddleback	Kiama Gerringong
	People	3,966	- Mountain	Heights erry
( ញ	Male	47.7%		
U U	Female	52.3%		
	Median age	45		
			Rose Va	illey
			Foxground	200
	Families	1.035	Willow	Beach
( <u></u>	Average children per family	1,000	roughton Vale	
THE A	for families with children	2	Village	rringong
	for all families	0.8	Princes	2
			Toolijooa 🗸 🗸	, r
	All private dwellings	1,686	Gerr	
	Average people per household	2.6	Gern	Da
	Median weekly household income	\$1,496	0.20	19 MapData Services Pt
	Median monthly mortgage repayments	\$2,123	3	To mapbala corrides I L
	Median weekly rent	\$410		
	Average motor vehicles per dwelling	1.9		



#### APPENDIX D – Evidence of approximately 20 residential dwellings – November 2019

(note - 1 property was an industrial site)





