

Our Reference: 1617032  
Contact: Lauren Schmidt



2 August 2019

Chief Executive Officer  
Tweed Shire Council  
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Dear Sir/Madam

Attention Ms Valerie Conway

**CONCEPT DEVELOPMENT APPLICATION FOR TEN (10) GROUP HOMES (PERMANENT) WITH FULL DEVELOPMENT CONSENT FOR TWO (2) GROUP HOMES (PERMANENT) AT LOT 6 DP 524303; NO 26 GEORGE STREET, MURWILLUMBAH**

We refer to our recent conversation with Ms Valerie Conway and we have passed on Councils position to our client. Our client, RGBAH Holdings, has instructed us to provide the following statement on their behalf.

It is understood that Council are concerned that the development does not fit within the definition of a Group Home, as defined within Tweed Local Environmental Plan 2014. In order to overcome this a Plan of Management has been prepared which is intended to provide comfort to Council that the proposal will be housing for people with a disability or people who are socially disadvantaged. However, there are further concerns from Council that the proposal may not operate as a single household. Council is concerned that because the tenancies are all self-contained they do not operate as a single household. Although communal laundry and outdoor open space are provided Council are not satisfied that this can be considered a single household.

Council have requested that each building, that has 6-7 tenancies, operate as a single household. This will involve removing kitchens from each of the proposed tenancies and providing a communal kitchen for use of all occupants of the Group Home. Our client believes that this will require all occupants to interact together and all the tenancies to be part of one household but removes privacy, self-sufficiency and dignity from the residents.

North Coast Community Housing [NCCH] are in a joint venture with the applicant and are the intended operator of the development. They are of the view that the requested changes to the building design provides housing that will be detrimental to the prospective tenants and the surrounding community.

Enforcing that individual tenants interact with people in other tenancies, they are unrelated to, is similar to a boarding house. This structure does not provide housing that is beneficial to people who are experiencing social disadvantage. People have the right to privacy and to dwell within their individual tenancy as they so choose. In NCCH's extensive experience boarding houses cause an array of social issues, such issues those raised by the submitters.

The applicant does not want to pose such impacts to the community which is why they were reluctant to make the changes requested by Council. The land use definition does not fit the NCCH's model for providing community housing that is beneficial to the tenants and the surrounding community

The applicant has a concern around the increasing demand for social housing within Tweed Shire Council and was of the understanding that was shared by Council. The strategy taken by Council on this application seems counterproductive to Tweed Shire Council's Affordable, Attainable and Appropriate Housing Policy Statement.

Having regard to the above I can confirm that our client does not intend to withdraw the application and has requested that it proceeds to be determined by Council.

Yours faithfully,

**Place Design Group**

A handwritten signature in black ink, appearing to read 'Peter Bell', with a stylized flourish at the end.

**Peter Bell**

Principal (Gold Coast)

Cc: Geoff Smith