

Submission

Draft Local Strategic Planning Statement Bega Valley Shire



Introduction

Thank you for the opportunity to comment on Bega Valley Shire's Draft Local Strategic Planning Statement (LSPS) March 2020, which sets the strategic aims and objectives for land use in the region for the next 20 years. We congratulate the council on its draft plan and support its aim to align with the United Nations Sustainable Development Goals (2015).

As the peak body for housing policy in NSW, Shelter NSW is making submissions on all draft statements in regional councils expecting significant residential growth. The LSPS will build a bridge between state and local government plans for land use which makes it a key opportunity to promote dialogue about creating a better housing system. The purpose of this submission is to ensure that the LSPS process helps to create a secure home for all.

Having reviewed Bega Valley Shire's draft LSPS we have identified a number of practical policy and planning mechanisms that could be used to either support or strengthen the final LSPS in its aim to deliver both affordable and more diverse housing options.

Our submission is structured in four parts. We have provided an overview of Shelter NSW's role as the state's peak body for housing policy advocacy; a summary of the key messages we heard throughout our recent consultation sessions across NSW to develop a new vision for the future of our housing system; an overview of the critical housing Actions in the draft LSPS with comments; and finally, we make several recommendations seeking endorsement from the council to be included as Actions for the final LSPS.

About Shelter NSW

Shelter NSW is the state's peak body for housing policy advocacy. Established in 1975, we represent broad interests across the housing system instead of a specific industry or sector view. Our diverse network of partners includes organisations and individuals that share our vision of a secure home for all. We pursue this vision through critical engagement with policy and by providing thought leadership.

As an independent non-profit organisation, we advocate for systemic housing policy reform and provide advice on policy and legislation. In doing so, we research the causes of inequality within the NSW housing system and promote solutions that ensure better housing outcomes for households on lower-incomes. We then leverage this expertise to engage and collaborate with the sector to work towards an economically, socially and environmentally sustainable housing system.

Key messages from Shelter NSW's visioning sessions

In 2019, Shelter NSW held seven workshops across regional NSW and Greater Sydney to develop a shared vision for a better housing system. Close to 200 community members spoke at these sessions about the problems they see as facing the housing system and the actions they want to see to address them. Here is a summary of their insights that are relevant to all levels of Government.

1. Make plans that emphasise housing as a home, not just an investment

The concept of 'home' should be at the core of housing policy. A home provides security, stability and safety. It underpins health, social connections and participation in work and society. However, speculative investment in housing and the standard model of development is not delivering housing people need or can afford. The Government needs to talk with communities about these problems and discuss solutions. Once they do, they should make a plan for specific regions that addresses the issues they can control and work with other levels of Government on ones they cannot.

2. Build places and communities, not just houses and towers

New housing should be located close to jobs and services and improve the quality of existing neighbourhoods. Well-connected and well-designed homes make it easy for people to get around and transition between various stages of life. However, developers seem to be delivering either car-dependent sprawl or low-quality density. Both result in different kinds of congestion and unpleasant environments. They need to find a middle ground to win community support. Government authorities can help them do so through its planning, support for innovative designs and investment in infrastructure.

3. Provide diverse housing that everyone can afford, not just high-income earners

The housing system should be as diverse as the community to give people the options they need. Ageing households can then downsize, and young people can become independent. Women can then leave abusive relationships, and First Nations people can live on Country. Students can then focus on their education, and key workers can live in their communities. Most important, people experiencing homelessness can find a secure home. To provide these options, governments need to invest in social and affordable housing as well as create more diversity in the housing market.

4. Make renting a genuine alternative to ownership, not just a transition phase

Tenants should be able to expect security and a high level of service when they rent their home. This protection is especially true now that homeownership is in decline. However, the possibility of no-grounds evictions makes it hard for tenants to put down roots or request repairs. Equally, social housing has become seen as a temporary safety net which is increasingly rationed and run-down. Governments need to ensure rental housing is both secure and high quality. In can do so by amending laws and policies that support long-term renters and providers of suitable housing options.

5. Use housing policy to address climate change, not exacerbate it

Our built environment should help us transition to a zero-carbon economy. Housing design and construction techniques can reduce our energy consumption and extraction of new resources. So too can planning and subdivision protect our homes from natural hazards and limit our reliance on cars and lifts. Trees can cool our streets and infrastructure can make them walkable. All of this improves our health and saves us money. Governments need to use all of these tools to prevent and avoid the worst effects of climate change which we are just starting to see and feel.

Comments on Housing-Related Actions Outlined in the Draft LSPS

Shelter NSW acknowledges that the council's Draft LSPS aims to take into consideration long-term trends in the local housing system and identify what is essential in terms of future community needs. We also note the efforts made to identify and mitigate any negative trends concerning recreation, employment, housing, and goods and services provision.

The following table outlines the proposed actions in the LSPS related to improving both the affordability and diversity of dwelling types in the LGA, to improve housing choice for residents. It highlights any proposed housing-related Actions and provides additional feedback on ways to support or strengthen them. In the case that our suggestions go beyond the direct control of the council, we are happy to collaborate on any future work in our capacity as the state's peak body for housing advocacy.

Table of Proposed Council Actions & Shelter NSW Comments
<p>Proposed Action 10.1 Develop an affordable housing strategy to provide a framework to respond to housing needs.</p>
<p>Shelter NSW's comments In regard to the development of a local Affordable Housing Strategy, Shelter NSW makes the following suggestions:</p> <ol style="list-style-type: none">1. That the council work in partnership with Community Housing Providers (CHPs) and the Department of Communities and Justice to facilitate the delivery of new affordable housing options.2. That the council commits to collecting information on the housing needs of vulnerable communities or those at risk of homelessness in collaboration with local support services, and develops policies which appropriately respond to these needs.3. That the council considers including in its affordable housing strategy the following incentives to organisations or authorities that deliver affordable housing <i>in perpetuity</i>: a fast track DA process, fee reduction or waiver, density bonus, car parking reduction bonus, and waived or modified s7.11 contributions. We recommend that any exemption should be targeted at public housing or not-for-profit developers (CHPs) linked to affordable housing, which is secured in perpetuity, rather than for a minimum of ten years.4. As part of any CBD or 'town centres' master plan, the council should consider ways to deliver housing diversity in a variety of forms, such as shop-top housing, for example.
<p>Proposed Action 10.2 Promote the need for housing diversity to local developers and builders.</p>
<p>Shelters NSW Comments Shelter NSW recommends that the council organise a number of regular workshops and consultations with local developers and builders on ways to deliver more diverse housing opportunities.</p>

Proposed Action 10.3

Review planning controls for medium density areas including potential for incentives to encourage greater housing diversity and development uptake

Shelters NSW Comments

1. That the council considers **replacing all Low-Density Residential Zone R2 zones with General Residential R1 zones** across the whole LGA, as this would support opportunities for different housing options to be delivered.
2. Council consider the development of precinct plans linked to expanding housing choice in key precincts connected with essential services such as Bega CBD, shopping centre facilities, educational and University facilities, co-located critical medical facilities and transport infrastructure.
3. Consider mandating for a proportion of bedroom types, especially in CBD or town centre developments.

Proposed Action 10.4

Review areas suitable for seniors housing and assess opportunities to support their development

Shelters NSW Comments

1. Shelter NSW would be happy to work with the council to lobby the Government on any proposed amendment to the SEPP - Housing for Seniors or People with a Disability (2004) in support of this Action.
2. The council should also support older residents to age in place through the adoption of universal design principles, such as the Livable Housing Guidelines. This will help to ensure dwellings are accessible, better designed, and easier to use for the whole community, not only for older residents.

Proposed Action 10.5

Review the planning controls in rural zones to increase the provision of affordable housing options without permitting further subdivision of land

Shelters NSW Comments

1. One initiative that may help achieve this Action would be for the council to support the development of a Community Land Trust (CLT). A CLT is a form of shared land ownership, where a community-based entity owns the land, while the buildings are owned by individual households (or leased long-term). The land trust would be responsible for the delivery and management of infrastructure. The Bend (<https://bend.org.au/>) project in Bega has some similarities with the land trust model.
The land trust model would also support the delivery of affordable housing options.

Proposed Action 10.6

Develop plans to guide the future density and form of infill residential development and road servicing requirements in rural villages including Cobargo, Cadelo, Bemboka, Wolumla and Wallaga Lake.

Shelters NSW Comments

1. Shelter NSW recommends that the council consider the implementation of a single General Residential R1 zone across the whole LGA to support opportunities for the delivery of diverse housing options.

<p>2. The council should also consider mandating the delivery of a certain percentage of affordable housing in any new development precinct. 10-15% would be an appropriate affordable housing target for new developments.</p>
<p>Proposed Action 10.7 Investigate opportunities to apply a cap to short-term rental accommodation to balance the economic benefits and housing needs and affordability</p>
<p>Shelters NSW Comments Shelter NSW would be happy to work with the Council on lobbying the State Government to expand the short-term accommodation rules for greater Sydney to the Bega region.</p>
<p>Proposed Action 10.8 Identify planning controls and incentives such as density or height bonuses that deliver different dwelling types, greater bedroom mix, and diversity of tenure.</p>
<p>Shelters NSW Comments</p> <ol style="list-style-type: none"> 1. Shelter NSW supports this initiative and feels it should be a core-planning tool in any new development precinct, especially those linked to essential infrastructures, new planning precincts and 'master plan' areas. 2. We recommend the council explore facilitating the delivery of shop-top housing to diversify housing options. 3. The council should also consider the implementation of a single General Residential R1 zone across the whole LGA to support opportunities for different housing options to be delivered. 4. The council should consider including incentives in the DCP of General Residential R1 zone and Medium Density R3 zones - for example, height bonuses - to encourage the delivery of a diversity of dwelling types, promote bedroom mix, and allow for a diversity of tenure.
<p>Proposed Action 10.9 Develop and implement urban renewal plans to encourage redevelopment that increases the supply and diversity of housing in Bega, Merimbula and Eden</p>
<p>Shelters NSW Comments Shelter NSW recommends that the council consider a review of its DCP with the primary aim of increasing housing choice and affordability through the use of planning tools.</p>
<p>Proposed Action 4.2 Work with LALC to develop strategies for the development of their land to respond to housing needs and support economic opportunities</p>
<p>Shelters NSW Comments Shelter NSW would like to see a commitment by the council to work with the Local Aboriginal Land Council on the development of a strategic plan for their landholders aimed at supporting the sustainable and self-determined delivery of additional housing opportunities. We note that the development of LALC land should always be driven by the needs and priorities of the LALC and the community, and should only occur where it is appropriate and sustainable to do so - not simply for the sake of development itself.</p>

Thank you

Shelter NSW appreciates the opportunity to comment on Bega Valley Shire Draft Local Strategic Planning Statement (March 2020). We hope that the comments and insights we have provided bring some value to the council's strategic planning work in the housing policy space. We are also happy to continue our engagement with the council on the issues raised in our submission. If you wish to discuss our submission in more detail, please contact Stacey Miers on 0410 633 272 or by email at stacey@shelternsw.org.au.

Sincerely Yours,

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