



Shelter NSW Submission

Draft Queanbeyan-Palerang Regional Council LSPS



Introduction

Shelter NSW appreciated the opportunity to comment on Queanbeyan-Palerang Regional Council Draft Local Strategic Planning Strategy (LSPS). We congratulate Council on the high standard of its draft plans and support many of the proposed Actions outlined which aim to deliver both housing choice and affordability.

From Shelter NSW perspective, we see the LSPS process as an opportunity to promote dialogue about ways to deliver better housing outcomes for all NSW residents. Having reviewed the Draft Queanbeyan-Palerang Regional Council, we have provided comments/recommendations or practical policy suggestions that we felt might support or strengthen the housing related outcomes in your policy documents.

Our submission also provides an overview of Shelter NSW role as a state peak body in the housing policy and advocacy space. A summary of the key messages we heard during our recent consultation sessions across NSW about what communities see as a desirable housing system and from this we worked with communities to develop a new vision for a future housing platform.

About Shelter NSW

Shelter NSW is the state 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 inequity 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 wide 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 the housing policy. 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. It 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.

Shelter NSW Comments on Queanbeyan-Palerang Regional Council Draft Local Strategic Planning Strategy

The existing housing stock in major regional centres across NSW is dominated by detached homes, with a growing component occupied by 'empty nesters', many who have reached or are close to reaching retirement age. This situation has led to a mismatch between supply and need for older residents. Delivering homes that provide more choice is a crucial solution to mitigating some of the negative impact associated with these demographic changes into the future.

There has been increasing pressure on Government authorities to deliver greater housing diversity and affordability in an attempt to address some of the existing failures of the land use system and housing choice, which has created limited opportunities to deliver either choice or affordability to whole sectors of the population.

The NSW Government has responded to the mismatch between housing supply and need by inducting the Medium Density Code. However, numerous submissions and reports have identified that due to overlaying controls and inconsistencies between the Code and associated design guides, uptake of the Code has been limited. For this reason, many of the recommendations from Shelter NSW primary aim is to suggest options associated with planning and land use that could deliver both housing choice and affordability in the future.

The following Table outlines Shelter NSW response to the proposed strategic actions in the L Queanbeyan-Palerang Regional Council Draft LSPS related to sustainability, housing choice and affordability. It highlights Council strategic outcomes and provides feedback on ways to support or strengthen some of the proposed actions. In the situation where Shelter NSW suggestions go beyond the direct control of Council, we are happy to collaborate with the Council in any future advocacy-based operations.

Shelter NSW Comments on Queanbeyan-Palerang Regional Council Draft Local Strategic Planning Strategy.

The following Table outline Shelter NSW suggestions for Council to consider in its deliberation and implementation of the Queanbeyan-Palerang Draft LSPS

LSPS Proposed Action 4.13.4 Consult with key Aboriginal organisations and traditional owners on major projects to ensure the protection of Aboriginal heritage, cultural and significant sites. Ongoing and regular consultation with Aboriginal community

Shelters NSW Recommended Action

Shelter NSW would like to see a commitment by Council to work with the Local Aboriginal Land Council on the development of a strategic plan for their landholders aimed at supporting the delivery of additional housing opportunities for their members.

LSPS Proposed Action 4.10.5 Investigate housing and service needs to support additional aged population in Braidwood and Bungendore.

Shelters NSW Recommended Action

As part of Councils proposed Structure Plans review for its townships Shelter suggest that Council consider measures to support older residents to age in place through amendments to the planning controls to better support the delivery of age-specific housing options. This initiative would help aging residents to live within their communities and age in place.

That Council considers increasing housing density and diversity in locations with a high aging population by mandating for a mix of dwelling types. The aim would be to support the delivery of home that meet the need of loan person households and support older residents to age in their established communities.

LSPS Proposed Action 4.8.6 Continue to review rural residential supply and demand and balancing this against the principles of sustainable development.

Shelters NSW Recommended Action

Shelter NSW supports this Action as it recognises that land use, housing, transport and infrastructure planning interventions play a significant role in reducing greenhouse gas emissions and delivery sustainable communities. In line with this, we suggest that the Council consider the following options:

1. Investigate opportunities in the local planning framework (LEP and DCP provisions) to support liveable neighbourhood principles when assessing new subdivision and infill development proposals,
2. Support for a consolidated land use strategy based on reducing emissions,
3. Encourage shaded walkways, footpaths and bike routes,
4. Council develop a Green Building Policy to ensure new assets are designed and built to maximise energy efficiency outcomes,

5. Council work with the Department of Community and Justice and local Community Housing organisation to encourage them to retrofit their existing housing stock or delivery new stock with renewable energy-efficient initiatives such as solar panels,
6. Develop a housing strategy, which considers diversity in housing and land supply, that minimises urban sprawl, and supports infrastructure, sustainable design, climate change adaption.

LSPS Proposed Action 4.4.9 – Provide a range of housing choices at different costs to meet the changing needs of the community.

Shelters NSW Recommended Action

Shelter NSW understands that in many ways the Queanbeyan-Palerang Regional Council LGA delivers many affordable housing options for residents whose place of work is in the Australian Capital Territory (ACT).

The Queanbeyan-Palerang Regional Council LGA is predicted to see a population growth from 61,031 in 2020 to 78,756 by 2036, bringing an additional 18,000 residents. This growth will also see ongoing pressure on the regional housing market over time which will impact on housing affordability. To ensure that both the additional residents and those on low incomes have access to a secure home Shelter NSW makes the following recommendations.

That Queanbeyan-Palerang Regional Council LSPS recognizes that housing affordability is an issue for those on the low incomes, often these are essential workers.

That Council work in partnership with Community Housing Providers and the Department of Communities and Justice to facilitate the delivery of new affordable housing options within the LGA.

That Council defines affordable housing as an essential infrastructure (including public and community housing) in any future infrastructure plan (Note: this definition is from the Australian Infrastructure Audit 2019).

That the LSPS commits to developing a Local Housing Strategy LHS that addresses the delivery of affordable homes to people on very low to moderate incomes. Ideally, this strategy should explore ways to delivering new affordable housing options associated with land rezoning and value capture opportunities through the use of planning mechanisms such as:

1. SEPP 70/Affordable Housing Contribution Schemes
2. Voluntary Planning Agreements

SEPP 70/Affordable Housing Contribution Schemes

In February 2019, SEPP 70 was expanded to include all councils across NSW. The next step is for councils to prepare affordable housing contribution schemes and amend their local environmental plans so that they reference its affordable housing scheme. You can access the [Guideline for developing an affordable housing contribution scheme](#) at this link.

Shelter NSW suggests that Queanbeyan-Palerang Regional Council committee to undertaking an affordable housing strategy that includes a framework to deliver a % of affordable housing options for those on the low incomes and essential workers.

Planning Agreements

Currently, the only way for Queanbeyan-Palerang Regional Council to provide any affordable housing is to either provide it directly or to deliver it through a Planning Agreement framework.

Shelter NSW suggests that Council include in its planning agreements framework opportunities for a % of affordable housing to be acquired on major developments or those development being determined through a gateway process. This type of initiative would require the Council to include a clause in its policy to provide affordable housing. An example can be found in the Randwick Council Planning Agreement policy (https://www.randwick.nsw.gov.au/_data/assets/pdf_file/0007/25990/Planning-Agreements-Policy.pdf).

Canterbury Bankstown has a new draft Planning Agreement Policy which includes the following clause: a Planning Proposal that seeks an uplift of the residential floor space that exceeds 1,000 sqm of gross floor area (as defined in the applicable local environmental plan), then the equivalent of at least 5 percent of the increased residential floor space should be dedicated to Council in the form of residential dwellings for affordable housing, or as a cash payment for affordable housing.

LSPS Proposed Action

4.2.3 Undertake needs analysis for the main townships to identify necessary facilities to meet the needs of the existing and future population - Council to prepare Infill Housing Strategy for Queanbeyan and Bungendore

Shelters NSW Recommended Action

That Council considers the development of precinct plans linked to expanding housing choice in key precincts and townships connected with essential services such as shopping centre facilities, educational and University facilities, medical facilities and transport infrastructure. These locations could include a mandated proportion of bedroom types, especially in town centre developments.

LSPS Proposed Action 4.2.4 Investigate allowing higher density development on land adjoining areas where such open space provides increased amenity and recreational opportunities - Council to prepare Infill Housing Strategy for Queanbeyan and Bungendore

Shelters NSW Recommended Action - Review existing residential land zones

Shelter NSW suggests that Council review its existing residential Zones to consider ways to deliver more housing choice across the whole LGA. As part of this review that Council considers replacing many of its Large Lot Residential (R5) Zones with Low-Density Residential (R2) Zone; and replacing Low-Density Residential Zone (R2) with General Residential (R1) Zones. Also, in new growth precinct, the primary residential zone is

General Residential (R1) as opposed to Low-Density Residential (R2) or Large Lot Residential (R5) Zones. This review could sit alongside an evaluation of height controls and character assessment requirements to ensure that any new developments are not out of character from the existing. This initiative would support opportunities for different housing options to be delivered in areas with access to infrastructure and services and would help older residential to age in place.

Thank you

Shelter NSW appreciates the opportunity to comment Queanbeyan-Palerang Regional Council Draft Local Strategic Planning Strategy. We hope that the comments and insights we have provided bring some value to Councils strategic planning work in the housing policy space. We are also happy to engage with 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@sheltersnsw.org.au.

Sincerely Yours,

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