

Submission

Richmond Valley Council's Draft Local Strategic Planning Statement: Beyond 20-20 Vision



Introduction

Shelter NSW appreciates the opportunity to comment on Richmond Valley Council's Draft "Local Strategic Planning Statement: Beyond 20-20 Vision" (LSPS). We congratulate the council on its draft plan and support its aims to deliver better housing outcomes for all residents.

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 Richmond Valley Council'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 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'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 in Draft LSPS

Shelter NSW appreciates 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, and housing choice for local 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 Proposed Council Actions & Shelter NSW Comments

Proposed Action 1.1 Prepare Local Growth Management Strategies to guide future urban growth, including rural residential.

Shelter NSW Comments

- 1. As part of a growth strategy, we recommend the council takes into consideration ways to deliver more housing diversity through planning mechanisms. This could be by supporting more mixed-use (B4) or medium-density (R3) dwellings connected with essential services (such as town centres, shopping centres, educational and medical facilities and transport infrastructure).
- 2. As part of any CBD or 'town centres' master plan, the council should consider ways to deliver housing diversity in the form of options such as shop-top housing.

Proposed Action 1.2 Deliver sustainable, well planned, safe, healthy and efficient housing and settlement areas through urban design and hazard avoidance/management

Shelter NSW Comments

Shelter NSW supports this Action and would encourage the Council to consider the following initiatives:

- 1. To undertake consultations with community services and volunteer organisations on building community resilience to address disaster response.
- 2. To undertake consultations with public, community, and Aboriginal housing providers to look at water efficiency initiatives aimed at mitigating climate and weather crises such as drought.
- 3. Discouraging residential sprawl in favour of consolidation.
- 4. Encouraging the development of clustered housing in any new developments, with an open corridor design between houses as opposed to a scattered or uneven distribution (the clustering of dwellings provides better land protection through consolidated vegetation management practices).
- 5. Working with public, community and Aboriginal housing providers to ensure dwellings are adequately maintained to improve the survivability of structures in the wake of bushfires or drought.

Proposed Action 1.3 Monitor the supply and demand for housing and zoned urban land.

Shelter NSW Comments

- 1. We recommend the council consider developing 'precinct plans' aimed at expanding housing choice in key locations connected with essential services; and that
- 2. The council considers developing a local housing strategy that takes into consideration incentives to support the delivery of affordable housing.

Proposed Action 1.4 Council should be proactive in developing new land release areas, particularly in locations where demand is high, and the private market is lagging in supply.

Shelter NSW Comments

- 1. The council should undertake workshops with local developers and builders on ways to deliver housing diversity.
- The council should work in partnership with Community Housing Providers (CHPs) and/or the Department of Communities and Justice to facilitate the delivery of new affordable housing options.

Proposed Action 1.5 Encourage delivery of a diverse range of housing options including low-medium density housing, affordable housing, and Seniors Living.

Shelter NSW Comments

- 1. The council should consider mandating for a proportion of bedroom types, especially in CBD or town centre developments.
- 2. The council should support older residents to age in place through the adoption of universal design principles.
- 3. The council should review its planning controls to support the delivery of housing for seniors or people with a disability, close to town centres and essential services.

Proposed Action 1.7 Prepare a bushfire recovery Master Plan for Rappville

Shelter NSW Comments

1. Shelter NSW supports this initiative in line with the *Planning For Bushfire Protection* (2019) guide, developed by the NSW Rural Fire Service.

Proposed Action 8.3 Investigate options for mixed land uses (including residential accommodation) in the Business Zones

Shelter NSW Comments

 Shelter NSW would be happy to work with the council to lobby the State Government on proposed amendments to the Standard Instrument—Principal Local Environmental Plan Business Development Zones. We would support any amendments aimed at delivering residential developments close to places of work and vital infrastructure.

Proposed Action 3.3 Engage the Local Aboriginal Community during planning processes by developing engagement protocols

Shelter NSW Comments

- 1. 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 aimed at supporting the delivery of additional housing opportunities for their landholders.
- 2. The council should work with Aboriginal organisations on the development of a women's refuge service aimed at supporting those escaping domestic violence.

Thank you

Shelter NSW appreciates the opportunity to comment on Richmond Valley Council Draft Local Strategic Planning Statement: Beyond 20-20 Vision. 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,	Sincerely,
Principal Policy Officer Shelter NSW	Chief Executive Officer Shelter NSW
Stacey Miers	John Engeler