

Submission

Shellharbour City Council Draft Local Strategic Planning Statement



Introduction

Thank you for the opportunity to comment on Shellharbour City Council's Draft Local Strategic Planning Statement (LSPS). Shelter NSW congratulates the council on its work setting the strategic aims and objectives for land use over the next 20 years.

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 in the near future. 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 Shellharbour City 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 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’s comments on housing-related Actions in the Draft LSPS

Shellharbour City Council’s Draft Local Strategic Planning Statement (April 2020) builds on the community’s aspirations expressed in the Community Strategic Plan 2018 – 2028 (CSP). It also aims to deliver on the NSW Government’s Illawarra Shoalhaven Regional Plan (the Regional Plan), as well as other Council and NSW Government planning priorities.

The following table outlines the proposed strategic actions in the LSPS related to sustainability, housing choice and affordability. It highlights the council’s strategic outcomes and provides feedback on ways to support or strengthen any proposed Action to address local housing-related issues in an effective, inclusive manner. In the case that our suggestions go beyond the direct control of the council, we are happy to offer our support in an advocacy capacity on any future work or developments.

Table of Proposed Council Actions & Shelter NSW Comments
Proposed Action P1.1 – Continue to give effect to the Implementation and Delivery Plan of the Shellharbour City Local Housing Strategy.
<p>Shelters NSW’s Comments</p> <p>Shelter NSW commends the work undertaken by Shellharbour Council on its Local Housing Strategy (9.12.2019 Commissioned PSA Consulting). This study showed that Shellharbour LGA had limited housing choice and a shortage of smaller one and two-bedroom dwellings. The study also indicated that the LGA had a limited amount of homes available to locals on very low and low incomes. The area had also experienced an ongoing decline in public housing stock and had 638 people on the public and community housing waiting list in June 2018. In the last census (2016) 303 dwellings located in caravan parks or camping grounds identified as residents. This form of accommodation is an important safety net for those on low incomes as the area has no boarding houses or hostels for people experiencing homelessness. In response to these matters, Shelter NSW makes the following suggestions.</p> <p>Recommended Actions</p> <ol style="list-style-type: none"> 1. We would encourage the council to act on the fact that affordable housing (including public and community housing) is an essential component of any future infrastructure plan (This definition is from the Australian Infrastructure Audit 2019). 2. As part of any CBD or town centres master plan the council should consider ways to deliver or incentivise housing diversity in the form of options such as shop-top housing. 3. One additional stress in Shellharbour’s housing market is the issue of residential housing being lost to short-term visitor rental accommodation. The council should consider investigating opportunities to mitigate these impacts by applying a cap similar to the short-term accommodation rules for greater Sydney. 4. We would encourage the council to 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. 5. That the council considers including in its Local Housing Strategy the following incentives to organisations or authorities that deliver affordable housing in perpetuity: a fast track DA process, fee reduction or waiver, density bonus, car parking reduction bonus, waving or varying s7.11 contributions. We recommend that any exemption should be targeted at public housing or not-for-profit developers (CHPs), linked to the affordable housing being secured in perpetuity, not for a minimum of ten years.

<p>Proposed Action P1.2 – When undertaking LEP and DCP reviews, incorporate the principles of the Local Housing Strategy to guide increases in residential density.</p>
<p>Shelters NSW Comments</p> <p>The Shellharbour Council Local Housing Strategy (9.12.2019) suggests a need for additional dwelling diversity and choice in dwelling sizes in the Shellharbour LGA. More choice would also allow the LGAs increasing number of older residents to age in place.</p> <p>Recommended Actions</p> <p>Shelter NSW supports this action and would encourage the Council to consider the following initiatives:</p> <ol style="list-style-type: none"> 1. That the council considers ways to deliver more housing diversity across the LGA to help older residents to age in place by replacing Low-Density Residential Zone R2 zones with the General Residential R1 zone, as this would support opportunities for different housing options to be delivered. 2. That the council considers ways to deliver housing diversity in the form of options such as shop-top housing. 3. That the council considers increasing housing density and diversity by mandating for a mix of dwelling types, to ensure that an adequate supply of one, two, three, and four-bedroom units are developed. 4. That the council supports older residents to age in place through the adoption of universal design principles, such as the Liveable 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.
<p>Proposed Action P 8.3 – Work with the Local Aboriginal Land Council, Aboriginal Advisory Committee and Aboriginal Torres Strait Islander community and relevant State Government Agencies to identify and protect Aboriginal heritage, culture and heritage assets</p>
<p>Recommended Actions</p> <p>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 delivery of additional housing opportunities.</p>
<p>Proposed Action P17.1 Continue to implement the strategic planning recommendations of the town centre plans for Albion Park, Oak Flats, Shellharbour Village and Warilla.</p>
<p>Shelter NSW Comments & Recommended Actions</p> <ul style="list-style-type: none"> • Considering the high level of unmet housing need within the LGA, we recommend that Council consider ways to capture some of the increased land value uplift associated with the rezoning of areas such as Albion Park, Oak Flats, Shellharbour Village and Warilla. We suggest that the council considers Shelter NSW recommendation to capture a least 10% of uplift for affordable housing through a clear VPAs framework applied to these areas. • We also suggest that the council considers the use of other value capture mechanisms to deliver additional affordable housing options across the LGA.
<p>Proposed Action P17 3 – Prepare a Night Time Economy Strategy to broaden the range of night time activities in our town centres</p>
<p>Shelter NSW Comments</p>

As evident in numerous night-time economic strategies, one key element in delivering a night-time economy is to deliver housing choice connected with CBD, town centres, educational and University facilities, co-located with transport infrastructure and essential services.

Recommended Actions

1. We recommend that Council undertakes workshops with local developers and builders on ways to deliver more diverse housing opportunities linked to town centres and essential infrastructure.

Proposed Action P19.3 – Develop a Property Strategy for Council owned and managed lands

Recommended Actions

1. Shelter NSW would encourage Council to work with Community Housing Providers and/or the Department of Communities and Justice to support the delivery of new affordable housing options as part of any future property strategy or joint venture initiative.

Thank you

Shelter NSW appreciates the opportunity to comment on Shellharbour City Council’s Draft Local Strategic Planning Statement (April 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 engage 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,

Principal Policy Officer Shelter NSW
Stacey Miers

Sincerely,

Chief Executive Officer Shelter NSW
John Engeler