



# **Submission from Shelter NSW**

Wingecarribee 2040 Draft Local Strategic Planning Statement & Housing Our Community - Draft Wingecarribee Local Housing Strategy

# Introduction

Thank you for the opportunity to comment on the Wingecarribee 2040 Draft Local Strategic Planning Statement and your Housing Our Community - Draft Wingecarribee Local Housing Strategy. Shelter NSW would like to congratulate Wingecarribee Council on producing two outstanding policy documents that set out its strategic aims and objectives for land use and housing supply over the next 20 years

As the peak housing policy body in NSW, Shelter NSW is making submissions on the draft LSPS and housing policy for those regional local Government areas expecting population growth. The purpose of these submissions is to provide feedback aimed at supporting the LSPS and housing policy frameworks to create future housing options for all.

Our submission provides; an overview of Shelter NSW's role as the NSW State peak body for housing policy and advocacy. A summary of the key messages we heard during recent consultation sessions across NSW. Shelter NSW suggestions for Council to consider in their final LSPS and residential housing strategy.

# **About Shelter NSW**

Shelter NSW was established in 1975, and it aims to represent broad interests across the housing system rather than a specific industry or sector. Our diverse network of partners, including organisational and individual members, share our vision of a secure home for all which we pursue through critical engagement with housing policy and practice and leadership forums.

As an independent non-profit organisation, our work involves advocating for systemic housing reforms and providing advice on policy and legislation to governments. We do this by researching the causes of inequities within the housing system with the overall aim of promoting solutions with a focus on the current and future housing needs. Our goal is to leverage our expertise, as we engage and collaborate with our members and stakeholders towards delivering an economically, socially and environmentally sustainable housing system.

#### Key messages from Shelter NSWs 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 the key messages we heard 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 safety, stability and security. It underpins health, social connections and participation in work and society. However, speculative investment housing and the standard model of development is not delivering housing people need or can afford. Governments need to talk with communities about housing issues and discuss solutions. Once they do, they should make plans for cities and regions that address the matters they can control and work with other levels of government on the 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 access the services they need; get to the jobs they want and move between various stages of their lives. However, new developments seem to deliver either car-dependent suburbia or poor-quality density. Both result in different kinds of environmental and social challenges. Instead, we need to find a middle ground to win community support. Governments can help them do so through land use planning, support for innovative designs and investment in quality local infrastructure.

# 3. Create 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 focus on their education, and essential workers can live closer to their jobs. 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. Tenure security 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 a temporary safety net which is rationed and run-down. Governments need to ensure rental housing is both secure and high quality. It can do so by with laws and policies that support long-term renters and ensure providers deliver appropriate housing.

#### 5. Address climate change through the housing system, 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 resource use. Good planning and subdivision can protect our homes from natural hazards and limit our reliance on cars. Trees can cool our streets and infrastructure can make them walkable. Existing homes can be made more efficient in terms of their energy and water use. All of this improves our health and saves us money. Governments need to actively support all of these tools to prevent and avoid the worst effects of climate change which we are starting to see and feel in our daily lives.

#### Shelter NSW's comments on the Drafts LSPS and Housing Related Policy Issues

Shelter NSW acknowledges that Wingecarribee 2040 Draft Local Strategic Planning Statement and its Housing Our Community - Draft Wingecarribee Local Housing Strategy are comprehensive reports. They consider both local and regional population and housing trends and aims to identify the crucial issues that need to be addressed in terms of future community requirements. These reports also include a substantial component of housing-related Actions (see appendix A – which lists each one of these identified Actions from the LSPS and Housing strategy)

Based on ABS census data Wingecarribee Local Government Area (LGA) has one dominant housing choice available 90.7% of its stock is stand-alone dwellings (separate dwellings), compared with the NSW average of 66.4%. Semidetached homes make up 5.9% and only 1.8% of dwelling as apartments. This situation means the Wingecarribee LGA has limited housing choice options available.

In terms of the area's population makeup, over 25% of the LGA's residents are 65 and over. This situation is estimated to increase to over 35% by 2036. These statistics correlate with expected growth in couple only and loan person households. This situation will mean that 66% of all households in the Shire will be made up of two or fewer people by 2036 (Source: Housing Our Community - Draft Wingecarribee Local Housing Strategy p13). Based on this data, a significant percentage of the population will need access to a variety of housing options different from the current dominant dwelling form.

The LGA's population is estimated to grow by over 4000 people by 2036, and its population makeup will continue to be dominated by an aging population (60 years and Over) and this correlated with the ongoing growth in loan person households into the foreseeable future.

The NSW Regional Plan estimates that Wingecarribee LGA will need to deliver an addition 3.300 dwelling to meet its projected population demand by 2036. Council has specified in its strategies that most new housing supply will be in the following New Residential Living Areas: Moss Vale (Chelsea Gardens Coomungie and Surrounds), Bowral (South) Moss Vale (West) Mittagong (East) Robertson (North East) Colo Vale (Wensleydale). Council aim is to deliver 20% of all new dwellings as medium density or smaller lot developments. To achieve its 20% target Council needs to ensure that around 800 of the 3,300 new dwellings are either medium density or smaller lots. It seems based on the proposed masterplans for these areas that the new housing stock is unlikely to deliver any two- or one-bedroom homes. It appears that the majority of dwelling in these developments will continue to reflect the dominant stand-alone dwellings (separate dwellings) form with some on smaller lots.

Based on the situation outlines above and a supply chain of 3,300 homes, the LGA will still have an ongoing disconnect between a stand-alone dwelling (separate dwellings), three bedrooms or more and a growing demand for homes that meet the needs of single-person households and an aging population.

Shelter NSW feels that for Council to address the aspirations outlined in Wingecarribee 2040 Draft Local Strategic Planning Statement and its Housing Our Community - Draft Wingecarribee Local Housing Strategy, it will need to ensure that all new homes provide different housing option to those currently in the market. It will need to go beyond delivering more single dwelling homes.

On top of the concerns outlined above re limited housing choice options, the LGA need additional affordable housing opportunities as Council points out around 20% of its community rent and close to half of these renters (7.1%), pay 30% or more of their household income in rent. This situation means that around half of the current rental stock is unaffordable for people on low to moderate incomes, who are the types of people that will be required to deliver support service linked with an aging population.

The following section outlines Shelter NSW support for many of Council existing proposed action, and we have included some additional strategies for Council to consider. In some situations where our suggestions go beyond the direct control of the Council, we are happy to offer our support in an advocacy capacity into the future.

# Shelter NSW Comments on Housing Related Issues in Wingecarribee 2040 Draft Local Strategic Planning Statement and its Housing Our Community – Draft Wingecarribee Local Housing Strategy.

# Suggested Options that aim to Increase Housing Choice and Affordability through the Planning System

The following points outline Shelter NSW suggestions for Council to consider in its deliberation and implementation of its Draft Local Strategic Planning Statement.

Investigate opportunities to amend the existing residential land use controls, with an emphasis on delivering greater lot variety, housing diversity, choice and affordability as well as encouraging climate-responsive dwellings and design outcomes.

That Council considers only implementing General Residential (R1) in the New Residential Living Areas of Moss Vale, Bowral (South), Moss Vale (West), Mittagong (East) Robertson (North East) and Colo Vale (Wensleydale). Many of these existing town centres are already dominated by large lot subdivision (Village Zone RU5) and stand along housing lots (Residential zone R2) and therefore provide few prospects to deliver diverse housing opportunities.

We suggest that Council review its current low-density residential zones (such as; Village RU5 Zone and Residential zone R2) and replace them with a General Residential (R1) zone to support the delivery of more housing choice options connected with townships.

The LGA has several key precincts connected with transport infrastructure, essential services such as shopping, educational, and medical facilities. Shelter recommends that the Council consider reviewing and amending its current low- density residential zones in and around its town centre CBD's to facilitate the delivery of diverse housing options. This review could consider replacing the existing low-density zones with General Residential (R1), Medium Density Residential (R3) or Mixed-use (R4) zones. This change would facilitate housing options, such as one- and two-bedroom dwelling and shop top housing to be built linked with town centres, CBD, and its surrounding residential area.

Council could also review its DCP, to require a proportion of one- and two-bedroom dwellings units to be delivered in all new developments. This type of initiative could be linked with incentives that support dwelling mix.

Council support any new residential development to be clustered housing with an open corridor design between houses as opposed to scattered developments (those predominantly associated with RU5 Zone). The clustering of dwellings provides better protection through consolidated vegetation management practices and encourages climate-responsive homes and design.

# Housing Strategy - Housing Our Community Draft Wingecarribee Local Housing Strategy

Shelter NSW supports the identifies Actions in the Housing strategy. We have highlighted listed those Actions we see as essential to delivering housing choice affordability. Shelter NSW has also made some additional suggestions for Council to consider in its final deliberation and implementation of its Wingecarribee Local Housing Strategy.

Council's to review its LEP and DCP provisions and remove any unnecessary barriers to facilitating more diverse housing options in appropriate locations. We suggest that the Council develop precinct plans that support the delivery of housing choice opportunities linked to essential service hubs.

Shelter supports the consideration for incentives to promote quality medium density development connected to strategic centres of Bowral, Mittagong and Moss Vale, including bonus provisions for affordable housing and good design outcomes.

Review planning controls to facilitate the delivery of housing options for over-55's within the LGA linked with town centres and essential services so that as the population grows older residents will have the opportunity to age in place.

Maintain Wingecarribee housing monitor to track and measure housing supply, diversity and affordability.

Facilitate efficient housing markets that meet the housing needs of the community, including addressing any gaps in the market, particularly in the area of affordable and social housing. Shelter suggests 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.

Develop an affordable housing strategy for the Wingecarribee Shire that identifies a clear policy for affordable housing contributions and the application of SEPP 70 to new residential living areas before rezoning. The NSW Governments is currently undertaking a review of its Planning Agreements and related practice note (On draft Exhibition April 2020). This review proposes that Planning Agreement **should not be** used to capture value uplift linked to delivering community benefits. Based on this situation it will be essential for Council be included in SEPP 70 if they wish to acquire or deliver affordable housing.

We support the consideration of incentives to promote affordable housing linked to strategic centres, including potential bonus floor space provisions for affordable housing. Council might consider linking the planning bonus with replacing the existing town centre zones with Mixeduse (R4) zones and height bonuses. This initiative would also support the delivery of smaller residential dwelling stock in locations that has access to essential service and transport infrastructure.

Council investigates how its assets could provide affordable housing alternatives. One possibility is to support the development of alternative housing models such as Community Land Trust (CLT) models or co- operative housing. (A CLT is a form of shared land ownership, we're a community-based entity owns the land component and the building are owned by individual household (or leased long-term).

Work with the Local Aboriginal Land Councils (LALC) on ways to deliver additional housing opportunities on their landholders as part of Council broader engagement strategies with Aboriginal communities.

Undertake a workshop with local developers and builders on ways to deliver more diverse housing opportunities.

Define housing as essential infrastructure (including public and community housing) in any future planning documents (Note: this definition is from the Australian Infrastructure Audit 2019).

The suggestions outlined in this submission aim to support communities to access different housing options in response to changing lifestyle needs. We also hope that the suggested initiatives will, in turn, have a positive effect on providing both housing choice and affordability across NSW into the future.

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 our Principal Policy Officer Stacey Miers on 0410 633 272 or by email at <a href="mailto:stacey@shelternsw.org.au">stacey@shelternsw.org.au</a>.

Sincerely, Stacey Miers

Principal Policy Officer Shelter NSW

Sincerely, John Engeler Chief Executive Officer Shelter NSW

#### Appendix A

Wingecarribee 2040 Draft Local Strategic Planning Statement (LSPS)

#### **Housing Actions:**

- Provide a diverse mix of housing types and choice to meet the needs of our community both now and into the future
- Provide an increase in smaller housing options in the Shire, with a target of 20% of all new dwellings to be medium density or small lot housing options
- Provide a 50/50 split of infill and greenfield development to meet our housing needs
- Develop and maintain a Wingecarribee housing monitor to track and measure housing supply and diversity
- Facilitate ageing in place by increasing housing choice and adaptable housing options, and provide seniors housing in appropriate locations close to transport and services
- Promote good design that reflects the values of our communities and respects and enhances the character of our towns and villages
- Ensure the Wingecarribee planning framework facilitates a mix of housing types and lot sizes and provides certainty to the community and development industry
- Consider incentives to promote quality medium density development in our strategic centres of Bowral, Mittagong and Moss Vale, including bonus provisions for affordable housing and good design outcomes
- Review Council's LEP and DCP provisions and remove any unnecessary barriers to achieving our planning priorities
- Manage the release of new greenfield development areas to ensure greenfield land does not compromise infill development
- Introduce new development controls that ensure medium density development is in keeping with the desired future character of our towns and villages.
- Provide a diverse range of housing options and price points across the housing continuum, to ensure that our community has access to housing that meets their needs, aspirations and capacities
- Investigate ways of supporting affordable housing opportunities via collaboration and partnership arrangements between developers, State Government, local community housing providers, Local Aboriginal Land Councils and community-based groups.
- Engage community housing providers in the planning and provision of affordable and social housing
- Engage Aboriginal Land Councils to ensure housing needs of the Aboriginal community are met
- Consider incentives to promote affordable housing in our strategic centres of Bowral, Mittagong and Moss Vale, including potential bonus floor space provisions for affordable housing
- Ensure Council processes support streamlined approval for housing, particularly special needs housing.

- Facilitate efficient housing markets that meet the housing needs of our community, including addressing any gaps in the market, particularly in the area of affordable and social housing
- Develop an affordable housing strategy for the Wingecarribee Shire.
- Provide a diverse range of housing options and price points across the housing continuum, to ensure that our community has access to housing that meets their needs, aspirations and capacities
- Investigate ways of supporting affordable housing opportunities via collaboration and partnership arrangements between developers, State Government, local community housing providers, Local Aboriginal Land Councils and community-based groups
- Engage community housing providers in the planning and provision of affordable and social housing
- Engage Aboriginal Land Councils to ensure housing needs of the Aboriginal community are met
- Consider incentives to promote affordable housing in our strategic centres of Bowral, Mittagong and Moss Vale, including potential bonus floor space provisions for affordable housing
- Ensure Council processes support streamlined approval for housing, particularly special needs housing.
- Facilitate efficient housing markets that meet the housing needs of our community, including addressing any gaps in the market, particularly in the area of affordable and social housing
- Develop an affordable housing strategy for the Wingecarribee Shire.
- Provide land and housing development opportunities to meet the needs of our community
- Promote sustainability through the appropriate location and design of new living areas
- Achieve a mix of housing types and lot sizes in new living areas to ensure that new development meets the needs of our community
- Develop a land and housing monitor that tracks the supply of greenfield and infill development supply
- Develop a staging plan for new living areas, to ensure that sufficient land is available to meet the needs of our community without compromising infill development
- Identify priority release areas and align infrastructure delivery to unlock the development potential of our priority release areas
- Regularly review the staging plan and land and housing monitor to ensure that greenfield land release does not compromise infill development
- Develop master plans for our new living areas, prior to rezoning, to provide for well planned, highly liveable communities into the future
- Develop infrastructure plans and servicing strategies for new living areas prior to rezoning
- Formalise a value capture system to fund a portion of the cost of providing new or augmented infrastructure to support new development
- Review Development Contribution Plans and Development Servicing Plans to ensure commensurate contributions are charged for greenfield development

- Ensure Council can provide the community infrastructure support needed for planned growth
- Work with NSW Government agencies to align their asset and infrastructure planning with planned housing growth to ensure delivery of adequate State infrastructure and services
- Review our Development Control Plan provisions to ensure that urban design controls maintain current views and vistas to the surrounding rural landscape and, provide that, when new development occurs, those views and vistas are enhanced

Housing Our Community Draft Wingecarribee Local Housing Strategy - Prepared by Wingecarribee Shire Council Draft for exhibition December 2019

This Strategy seeks to facilitate a housing stock that meets the needs of our community both now and into the future, which will require:

- New housing to accommodate population growth
- A greater mix of housing types and price points to meet the needs of our community
- An increase in social and community housing to accommodate our most vulnerable community members
- Increased opportunities for people to age in place, as well as increased options for seniors living type developments in close proximity to public transport and services
- An increase in smaller housing options including an increase in medium density development, smaller dwellings and smaller lot sizes
- Appropriately located development to reduce car dependency
- The planning priorities outlined in Chapter 3 of this Strategy specifically seek to address the identified housing needs of our community.

Planning Priority 1 – Promote infill development and increased densities in appropriate locations, and facilitate a greater mix of housing types to ensure our housing stock is reflective of the needs of our community

#### Actions

- Review Council's LEP and DCP provisions and remove any unnecessary barriers to facilitating more diverse housing options in appropriate locations
- Consider incentives to promote quality medium density development in our strategic centres of Bowral, Mittagong and Moss Vale, including bonus provisions for affordable housing and good design outcomes
- Review Council's LEP and DCP provisions and remove any unnecessary barriers to facilitating seniors living developments in our strategic centres of Bowral, Mittagong and Moss Vale
- Investigate options to increase housing choice in close proximity to our smaller town and village centres (i.e. Bundanoon and Robertson) to allow people to age in appropriate housing within their communities
- Introduce integrated housing provisions into Wingecarribee LEP and DCP to facilitate smaller lot housing in appropriate locations, with detailed design controls to promote good urban outcomes
- Ensure Council controls do not rule out new and emerging housing types that address the housing needs of our community

- Undertake a community education process to de-stigmatise medium density housing in the Shire
- Develop and maintain a Wingecarribee housing monitor to track and measure housing supply and diversity
- Manage the release of new greenfield development areas to ensure greenfield land does not compromise infill development
- Prepare new local character statements to outline the existing and desired future local character of our towns and villages
- Introduce new development controls that ensure medium density development is in keeping with the desired future character of our towns and villages.

Planning Priority 2 – Provide a greater mix of price points in the housing market to improve housing affordability, and work with community housing providers to increase the stock of social and community housing throughout the Shire

Housing affordability is an issue that requires action from all levels of Government and ensuring our community has equitable access to housing is a significant housing challenge for the Shire.

#### Actions

- Facilitate efficient housing markets that meet the housing needs of our community, including addressing any gaps in the market, particularly in the area of affordable and social housing
- Develop an affordable housing strategy for the Wingecarribee Shire that identifies a clear policy for affordable housing contributions and the application of SEPP 70 to new residential living areas prior to rezoning
- Consider incentives to promote affordable housing in our strategic centres of Bowral, Mittagong and Moss Vale, including potential bonus floor space provisions for affordable housing
- Work with community housing providers to maximise the potential of their existing housing stocks and increase the supply of affordable and social housing in the Shire
- Work with Aboriginal Land Councils to ensure housing needs of the Aboriginal community are met.

Planning Priority 3 – Provide for well planned new release areas to meet the long-term housing needs of the community, and ensure that our growing communities are supported by essential infrastructure

#### Actions:

- Develop a staging plan for new living areas, to ensure that sufficient land is available to meet the needs of our community, without compromising infill development
- Develop a land and housing monitor that tracks the supply of greenfield and infill development supply
- Regularly review the staging plan and land and housing monitor to ensure that
  greenfield land release does not compromise infill development Develop master
  plans for our new living areas, prior to rezoning, to provide for well planned, highly
  liveable communities into the future

- Develop infrastructure plans and servicing strategies for new living areas prior to rezoning
- Formalise a value capture system to fund a portion of the cost of providing new or augmented infrastructure to support new development
- Review Development Contribution Plans and Development Servicing Plans to ensure commensurate contributions are charged for greenfield development
- Ensure Council can provide the community infrastructure support needed for planned growth
- Work with NSW Government agencies to align their asset and infrastructure planning with planned housing growth to ensure delivery of adequate State infrastructure and services.