

# Shelter NSW Submission

## Eurobodalla Council Draft Local Strategic Planning Statement



### Introduction

Shelter NSW appreciates the opportunity to comment on the Eurobodalla Council Draft Local Strategic Planning Statement (LSPS) (May 2020). We congratulate Council on the high standard of its draft plan, and we support many of the proposed Actions outlined which aim to deliver both housing choice and affordability.

From Shelter NSW's 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 Eurobodalla Council Draft LSPS, Shelter NSW have provided comments/recommendations and practical policy suggestions that we feel might support or strengthen many of the housing-related outcomes Actions in your strategy.

Our submission also provides an overview of Shelter NSW's role as a state peak body in the housing policy and advocacy space, and a summary of the key messages we heard during our recent consultation sessions across NSW about what communities see as a desirable housing system. 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 rather than those of a specific industry or sector. 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 are not delivering housing that 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. Government authorities can help achieve this through 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. This system would support ageing households with the opportunity to downsize, and young people with the possibilities to 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 importantly, people experiencing or at risk of 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 the Draft Eurobodalla Council Local Strategic Planning Statement

Detached homes dominate the existing housing stock in most major regional centres across NSW, and this is also the case in Eurobodalla. A significant percentage of large dwellings are occupied by ‘empty nesters’, many of whom have reached retirement age. Eurobodalla LGA has a median age of 54 years compared with the NSW average of 38 years, and lone person households make up 31% compared with NSW, which is 23.8%. These statistics reflect this growing disconnect between limited housing supply choices and the requirements of an ageing population.

Although Eurobodalla is relatively affordable and many people own their home, housing prices continue to rise, there is a shortage of rental housing stock, and rents across the LGA are high compared with the NSW State average. This situation contradicts the idea that regional areas are cheaper places to live in terms of rental costs.

Eurobodalla Aboriginal and Torres Strait Islander population make up 5.6% of residents, and they often have particular housing-related issues. One such issues is limited affordable rental supply, and another is overcrowding which can have specific impacts regarding social and educational outcomes.

As evident from the data in Eurobodalla, there is a mismatch between housing supply and need for different population groups across the LGA and addressing these problems will be a significant challenge for the Council in the foreseeable future. Delivering new dwellings that provide more choice is one key solution to mitigate the adverse effect associated with the mismatch between population characteristics and future housing need.

The following Table outlines the proposed strategic actions in Eurobodalla Council Draft LSPS related to sustainability, housing choice and affordability. It provides feedback from Shelter NSW on ways to support or strengthen some of the proposed Actions outlines in the LSPS. In situations where Shelter NSW suggestions go beyond the direct control of Council, we are happy to collaborate with the Council in any future advocacy-based actions.



**Shelter NSW Comments on Housing Related Issues  
in the Eurobodalla Council Draft Local Strategic Planning Statement**

**Shelter NSW Supports Council’s Planning Priority and Strategic Actions**

Planning Priority 1 - Encourage greater housing diversity and affordability

Proposed Action

- Develop an Affordable Housing Strategy to respond to an ageing population and attract workers (medium term)
- Review and update the Eurobodalla Settlement Strategy (medium term)
- Investigate height controls, housing density and infill potential in town and activity centres (short term)

**Develop an Affordable Housing Strategy**

Regarding the development of a local Affordable Housing Strategy, Shelter NSW makes the following suggestions:

1. 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 to address the growing problem of rental affordability in the LGA.
2. We would encourage the Council to support the recognition that affordable housing (including public and community housing) is classified as essential infrastructure in future planning documents (This definition is from the Australian Infrastructure Audit 2019).
3. Council investigates opportunities to mitigate the impact of short-term rental accommodation to ensure a balance between housing needs and affordability for local renters.
4. That the Council consider including in its affordable 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, and waived or modified s7.11 contributions. We recommend that any incentive 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.

**Affordable Housing Strategy - respond to an ageing population**

1. Council consider including incentives in its DCP such as, height bonuses - to encourage the delivery of diverse dwelling types, promote bedroom mix, and allow for a range of tenures.
2. As part of any CBD or ‘town centres’ master plan, the Council consider ways to deliver housing diversity in a variety of form such as medium density aged or shop top housing options,



3. Council undertakes a review and identify areas suitable for seniors housing and assess opportunities to support their development.
4. For older people, particularly those living in more isolated communities, access to home modification services can enable them to stay at home and live independently. Shelter NSW would like Council work with the Department of Communities and Justice and/or the local National Disability Support Service and Aboriginal Housing Organisation to ensure dwellings are accessible and designed so that older residents can age in place.

### **Encourage greater housing diversity and affordability - Amend Residential Land Use Controls**

The following recommendations aim to support local economies, so they continue to thrive in the future and deliver housing options that address the long-term needs of communities. We suggest that the Council consider;

- Replace its Low Density Residential (R2), Village (RU5) and Large Lot Residential (R5) zones with General Residential (R1), and Medium Density Residential (R3) zones, in locations connected to essential infrastructures such as town centres, utility services, education hubs, medical facilities and transport hubs,
- That new residential release area be based on the General Residential (R1) zones and not dominated by Low-Density large lot land zones,
- Consider mandating for a proportion of bedroom types in new development, especially those located in CBD or town centre,
- Council organises a workshop with local developers and builders on ways to deliver more diverse housing opportunities.

### **Planning Priority - Encourage greater housing diversity and affordability**

As indicated by Council in its LSPS, Eurobodalla LGA has a comparatively high Aboriginal and Torres Strait Islander population of 5.6% in comparison to 2.9% for NSW.

Regarding this, Shelter NSW would like Council to support the delivery of housing opportunities that aim to improve housing outcomes that better address the social and cultural aspects of Aboriginal people lives.

Shelter NSW would like to see Council commit to working with the Local Aboriginal Land Councils (LALC) on the development of a strategic plan for their landholders, aimed at supporting the delivery of additional housing opportunities and appropriate design outcomes. This work can be based on the Aboriginal Land Framework (introduced by the NSW Planning System in 2019).



Proposed Action for Eurobodalla Affordable Housing Strategy:

1. to work cooperatively with LALC to rezone LALC land so that it can be used for additional social housing,
2. to explore ways to support secondary dwelling/granny flat accommodation on existing Aboriginal/social housing lots,
3. support ways to encourage the construction of additional Aboriginal social housing stock so that the underutilisation of existing housing and essential service can be addressed.

**Shelter NSW Supports Council's Planning Priority and Strategic Actions**

Planning Priority 2 Enhance the distinctive character of towns, villages and hamlets

Proposed Actions

- 2.1 Develop character statements for suburbs, villages and hamlets (short term)
- 2.2 Review Eurobodalla's LEP and DCPs with regard to urban design and place-based principles (medium term)
- 2.3 Review existing structure plans for the town centres of Batemans Bay, Moruya and Narooma (long term)

As part of Council character statements for suburbs, villages and hamlets and its LEP and DCPs review for town centres, Shelter NSW suggest that the following matters be considered;

1. That as part of Councils LEP and DCP review it evaluate planning and design outcomes that consolidate dwelling and landscaped area as opposed to facilitating dispersed developments as part of bushfires protection initiatives. This strategy will allow for better management of dwelling and vegetation, reduce bushfire impacts and support better water management practices.
2. Encouraging any new residential development to be 'clustered housing' as opposed to a scattered model (as the clustering of dwellings provides better protection through consolidated vegetation management practices).
3. Ensure that the review of its LEP and DCP aim of increasing housing choice and affordability through the use of planning tools.

Planning Priority - Consolidate development within town and village centres

Proposed Actions

- 3.1 Develop subdivision controls (short term)
- 3.2 Investigate preparing master planning for residential land release areas to strategically address land constraints (short term)
- 3.3 Review medium and high-density planning provisions in DCPs (short term)
- 3.4 Develop planning provisions concerning waterfront developments in DCPs (medium term)



1. Council consider including incentives in the DCP to encourage Medium Density developments such a density or height bonuses - to promote the delivery of diverse dwelling types, promote bedroom mix, and support for tenure diversity.
2. In locations connected town centres, education and transport hubs replace existing Low-Density Residential (R2), and Large Lot Residential (R5) zones with General Residential (R1), and Medium Density Residential (R3) zones.
3. That new residential release area be based on the General Residential (R1) zones and not dominated by Low-Density large lot land zones,
4. Consider mandating for a proportion of bedroom types in new development, especially those located in CBD or town centre,
5. That any master plan investigation for residential land release areas considers implementing the General Residential (R1) zones to provide additional housing choice options and better sustainability bushfires management outcomes.

## Thank you

Shelter NSW appreciates the opportunity to comment on Eurobodalla Council's 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@shelternsw.org.au](mailto:stacey@shelternsw.org.au).

Sincerely Yours,

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