

# Shelter NSW Submission

## Draft Nambucca Valley Local Strategic Planning Statement



### Introduction

Shelter NSW appreciates the opportunity to comment on the Nambucca Valley Council's Draft Local Strategic Planning Statement (LSPS) (March 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 in the context of a sustainable future.

From Shelter NSW's perspective, we see the LSPS process as an opportunity to promote dialogue about ways to deliver a secure home for all NSW residents. The purpose of this submission is to advocate for housing outcomes that address the longer-term systemic housing needs of both regional and urban communities. Having reviewed the Draft Nambucca Valley LSPS, Shelter NSW has provided practical policy suggestions that we feel might support or strengthen many of the housing-related Actions outlined in your strategy.

Our submission also provides an overview of Shelter NSW's role as the NSW State peak body in the housing policy and advocacy space. A summary of the key messages we recently heard during our community and stakeholder consultation sessions across NSW on what a desirable housing system should deliver is highlighted in the following section.

### About Shelter NSW

Shelter NSW was established in 1975, as the NSW State Housing peak body to advocate for better housing outcomes in response to urban redevelopment pressures. We grew from this to now representing the broad interests of a diverse network of partners and members who include organisations and individuals that share our vision of a secure home for all NSW residents. We pursue this vision through critical engagement with policy and collaborative leadership initiatives.

Shelter NSW is an independent, non-profit organisation, and we advocate for systemic housing policy reform and provide advice on strategies 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 people experiencing different levels of housing stress.



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 developments are not delivering housing that people need or can afford. The Government needs to talk with communities about these problems and discuss solutions. Following this engagement, they should make a plan for the specific region that addresses the issues they can control and works 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 Nambucca Valley Council Local Strategic Planning Statement

In regional NSW, freestanding dwellings dominate existing housing stock, with a significant percentage of homes occupied by 'empty nesters', many of whom have reached retirement age. This situation is evident in the population and housing characteristics of Nambucca Valley Local Government Area (LGA) from the 2016 ABS census. This data showed that around 85% of the LGA's housing stock was made-up of separate dwellings, that 27% of Nambucca Valley population was aged 60 years and older, and around 32% of homes were lone person households.

These statistics reflect the growing disconnect between housing supply (which continues to deliver stand-alone dwelling, especially in the regional areas) and demand. In many ways, this is due to local development interest with a focus on rezoning cheap rural land, often located on the edge of villages or town centres, for residential use.

The LGA also has a high percentage of low-income households; medium household income was \$837 while the NSW medium was \$1,486. Renters make up over 26% of residents and 11.4% were paying greater or equal to 30% of their household income in rent (ABS census data 2016).

The Aboriginal and Torres Strait Islander population make up 7.6%, compared with the NSW average of 2.9%, in the Nambucca Valley LGA (ABS census data 2016) and this community often has particular housing-related issues. One is limited access to affordable rental supply, and another is overcrowding which can have specific longer-term impacts regarding social and educational outcomes.

As outlined in the Council draft LSPS, projected population growth means the demand for new dwellings by 2036 will be between 22 and 58 new dwellings per year. At the high end, this will mean an additional 1,150 houses by 2036. Some of these new dwellings may address the growing need for more one and two-person households and provide



opportunities for a percentage of older residents to downsize and locate closer to town. However, it is unlikely to address the needs of low-income renters.

As evident from the data and issues discussed, the Nambucca Valley LGA has particular housing needs and a growing mismatch between housing needs and supply. How best to deliver new dwellings that provide more choice and are more affordable will be a significant task for the Council.

Shelter NSW sees new residential developments based on clustering dwelling patterns as one way to deliver better long-term housing outcomes. They provide opportunities for consolidated landscaping and vegetation, can reduce the risk of bushfire and facilitate delivery of better water management practices. In addition to these benefits, clustered developments offer better support for the economic base of smaller regional centres. This is achieved through the delivery of different housing options that address the needs of both younger and older single residents who want to live in smaller dwellings with stronger connections to town centres.

The following table outlines the proposed related strategic actions in the Draft Nambucca Valley 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 outlined 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 Nambucca Valley Council Draft Local Strategic Planning Statement**

**PLANNING PRIORITY 3 – HOUSING**

- Action 3.1 Monitor the take up of land for housing, including new release areas and infill development. Advocate and promote the efficient delivery of key infrastructure to new land release and urban growth areas
- Action 3.2 Review the Rural Residential Local Growth Management Strategy as a low priority short-term action
- Action 3.3 Advocate and seek opportunities to improve existing infrastructure to support sustainable growth and liveability in our existing towns and villages.
- Action 3.4 Prepare precinct plans for key areas such as the Nambucca Heads Town Centre and Valla Urban Growth Area
- Action 3.5 Consider new statutory obligations as they arise and determine appropriate responses for example the SEPP



- Action 3.6 Review housing related provisions in the Nambucca Development Control Plan as necessary
- Action 3.7 Continue to support the delivery of a diverse range of housing types and markets.
- Action 3.8 Review of Local Environmental Plan and Development Control Plan provisions for the Valla Growth Area

#### **Shelter NSW Suggestions on Incentives to Encourage Housing Diversity Across the LGA**

- Council consider increasing housing density and diversity in its town centres by mandating a mix of dwelling and bedroom types in new development. The aim would be to support the delivery of homes that meet the needs of younger residents and deliver alternative housing options for older residents to age in place.
- In locations connected to town centres, education institutions, medical facilities and transport hubs, existing Low-Density Residential zones such as; Large Lot Residential (R5) and Village (RU5) and Low-Density (R2) zones be replaced by with General Residential (R1).
- That, as part of any CBD or 'town centres' master plan, Council consider ways to deliver housing diversity in a variety of forms such as the introduction of more medium-density (R3) zones.
- To ensure that any new or infill development enhances the existing build form in regional town centres, Council includes a local character assessment requirement into its DCP.
- So that additional housing choice options can be provided, along with better sustainability and bushfires management outcomes, new semi-urban or fringe residential release areas be based on the General Residential (R1) zones as opposed to Low-Density or large lot residential zones.

#### **Workshops with Local Developers and Builders on Ways to Deliver More Diverse Housing Opportunities**

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

#### **Work with NSW Land and Housing Corporation to Deliver Affordable Housing**

- Council co-ordinate meetings with Community Housing Providers and the Department of Communities and Justice aimed at facilitating the delivery of new affordable housing options within the LGA.

#### **Prepare and Implement Planning Controls to Define and Regulate Short Term Rental Accommodation**

- Many key regional housing markets have seen the loss of low-cost rental housing stock to short-term visitor accommodation. One mitigation option is to apply the



“short term rental cap (a 180 days cap in any one year on short-term lettings) similar to rules for greater Sydney. Shelter NSW would be happy to collaborate with the Council on working with the NSW Government to expand the short-term accommodation rules for greater Sydney to critical regional Local Government Areas.

#### **Define Affordable Housing as Essential Infrastructure**

- Council define affordable housing as essential infrastructure (including public and community housing) in any future infrastructure or planning policy documents (Note: this definition is from the Australian Infrastructure Audit 2019).

#### **Explore Ways to Capture Increased Land Value Associated with Rezoning to deliver New Affordable Housing.**

- New affordable housing products could be delivered through the implementing of an Affordable Housing Scheme in Line with SEPP 70 (Affordable Housing Contributions Scheme). Considering the high level of renters paying 30% or more of their income in rent in the Nambucca Valley LGA, Shelter NSW suggests that the Council create a planning agreement framework to capture a percentage of the planning benefits delivered through rezoning. This framework will allow a % of affordable housing to be acquired. One best practice option is for Council’s planning agreement policy to include a clause to provide affordable housing (See an example of Randwick Council) - [https://www.randwick.nsw.gov.au/data/assets/pdf\\_file/0007/25990/PlanningAgreements-Policy.pdf](https://www.randwick.nsw.gov.au/data/assets/pdf_file/0007/25990/PlanningAgreements-Policy.pdf).

#### **Affordable Rental Data and Housing Target for the LGA**

- Shelter NSW suggests that Council establish a database to monitor the impact of housing stress. The housing data could be broken down into affordable, community, and public housing subsets. This housing data could be matched with an affordable housing target for the LGA. Shelter NSW suggests that the Council set a broad affordable housing target that around 10% of all housing stock be affordable. One example of this is Sydney City Council’s *Sustainable Sydney 2030* which established the following target by 2030; 7.5% of all housing in the local area will be social housing provided by the government and community providers, and 7.5% will be affordable housing delivered by not-for-profit or other providers.

#### **Support for Local Aboriginal Land Council to Delivery Additional Housing Opportunities**

- Shelter NSW would like to see a commitment by Council to work with Aboriginal Land Councils on the development of a strategic plan for their landholders. The aim is to support the delivery of additional housing opportunities for land council members. This process could focus on the development of a strategic plan for Aboriginal landholders, to promote the delivery of additional housing



opportunities and appropriate design outcomes on Aboriginal-owned land, (1) to work cooperatively with LALC to rezone land so that new affordable housing can be delivered, (2) to explore ways to support secondary dwelling/granny flat accommodation on existing Aboriginal/social housing lots and (3) to encourage the construction of additional Aboriginal owned housing stock so that the underutilisation of existing homes and essential service can be better utilised. This work could be based on the Aboriginal Land Framework (introduced into the NSW Planning System in 2019).

## Thank you

Shelter NSW appreciates the opportunity to comment on Nambucca Valley Draft Local Strategic Planning Strategy. We hope that the comments and insights we have provided bring some value to Council's 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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