



Response to *Camden Council*
Draft Local Strategic Planning Statement
Shelter NSW submission
August 2019

Introduction – and the context for Shelter NSW

Shelter NSW has been operating since 1975 as the state’s peak housing policy and advocacy body. Our vision is “A secure home for all”. We pursue our vision through critical engagement with policy and practice and thought leadership. We provide systemic advocacy and advice on policy and legislation for the whole NSW housing system to resolve housing inequality and we seek to ensure that the voices of housing consumers are included in our policy responses and review.

Our approach involves engaging, collaborating and connecting with Government, the private and not for profit sectors, stakeholders and consumers. Our research centres on the causes of inequity and injustice in the housing system and we advocate solutions that aim to make the housing system work towards delivering a fairer housing system for all.

Shelter NSW is concerned about the housing crisis in NSW and the rising trends in homelessness, housing rental stress as well as the impacts of poor- quality housing, particularly on low income households¹. Over three quarters of lower income renters in NSW are paying unaffordable rents (92% of very low- income renters in Sydney). Lower cost properties are being steadily replaced with new ones at higher rents, and new concentrations of disadvantage have been created across our major cities as low income households are displaced. The NSW rental market is failing, forcing our most vulnerable citizens to go without essentials and are being excluded from jobs and opportunities.

Shelter NSW priorities are [centred on four core areas](#)², all of which are relevant to the Local Strategic Planning Statements:

- **Building enough low-cost rental housing to meet current and future need** – and recognition that social and affordable housing are critical social and economic infrastructure;

¹ See Shelter NSW 2019 Election Platform

<https://www.sheltersnsw.org.au/uploads/1/2/1/3/121320015/sheltersnsw-2019-election-platform.pdf>

- **Making housing fair for all** – so that people with specific housing needs such as accessibility or adaptability needs have fair access to housing;
- **Giving renters secure homes** - so that they have security of tenure and can put down their roots in a community without fear of unfair evictions; and
- **Making sure low-income households aren't excluded in the redevelopment of Sydney and regional centres.**

We are pleased to provide comment on Camden Council's draft Local Strategic Planning Statement (LSPS).

The broader context

It is important to consider the issue of housing affordability in the context of the Greater Metropolitan Region, and the urban planning system that operates across New South Wales. There is currently considerable public interest in the policies and instruments that can be used to generate more affordable housing through the planning system, which is pertinent to the work of councils as local planning authorities. This has been captured in the Greater Sydney Commission's (GSC) Region and District Plans, which have recommended the introduction of Affordable Rental Housing Targets in areas to be defined by councils and in planned precincts. The NSW Department of Planning, Industry and Environment (DPIE) has noted housing affordability as a key principle for consideration in the development of councils' local housing strategies. DPIE has also recently amended State Environmental Planning Policy No 70 (SEPP70) – Affordable Housing (Revised Schemes) to make all councils in New South Wales eligible to consider using the inclusionary zoning provisions available in the Environmental Planning and Assessment Act 1979 and published a *Guideline for Developing an Affordable Housing Contribution Scheme*.

This is all occurring amidst a growing and changing population dynamic that is applying new pressures to our existing urban communities. Sydney is no longer just growing outwards, pushing its rural/urban fringe further from the city's main centres. It is consolidating and developing new urban centres closer to the fringe, and large tracts of already developed land that are well within the city's inner and middle suburban rings are earmarked for or undergoing renewal at increasing levels of density. As market driven developers drive significant transformation of communities and neighbourhoods, low-cost housing in the private rental market being displaced with higher cost high density housing. As a consequence, more low-income households look for affordable housing in suburban and regional centres that are well connected to the CBD and the rest of the metropolitan area. This impacts on what were traditionally considered low cost housing areas, placing greater strain on their housing supply and infrastructure. It also has an impact on areas where housing is more expensive such as many people who work in the area are forced to leave in search of more affordable housing, adding to pressure on transport infrastructure and a loss of residents, especially young people who grow up in the area but can't continue to afford the rents in the area.

Locally prepared and implemented planning strategies that aim to address housing affordability challenges will help mitigate some of these negative impacts, provided they are sufficiently ambitious and properly resourced. But the context in which urban change is currently occurring means concentrating on local strategies is only one part of managing a response. The Camden LGA is a unique among the Sydney Metropolitan LGAs. Camden has a rich cultural and rural heritage and is the fastest growing LGA in Australia. Its close proximity to the planned Western Sydney Airport offers significant economic opportunities. Planning for sustainable growth that supports economic and social diversity will help leverage the opportunities to ensure Camden continues to be a productive and liveable place to live and work.

Principles for Local Strategic Planning Statements (LSPS)

Shelter NSW recognises that a “one-size-fits-all” approach is limited in providing an appropriate framework to plan for and manage land use that is responsive to the community’s need now and into the future. We recognise that a local council’s capacity to deliver and facilitate the delivery of new Affordable Housing across Sydney and New South Wales varies across the Greater Sydney Metropolitan region and understand the need for variation to suit the broad range of local conditions. To assist Councils we have developed [broad principles](#) that can be applied to all LSPS³ to ensure LSPS provide a robust framework to support the community’s growing and changing needs for affordable and diverse housing. Our submission is underpinned by these principles.

1. The LSPS recognises and quantifies local need for housing that is affordable to those on the lowest 40% of incomes

The LSPS should recognise that housing affordability is an issue within the area. It should include some high-level measures of this need such as the proportion of households in the area who are in housing stress, and/or the proportion of very low- and low-income households in the area. The LSPS should commit to further quantifying and measuring the need for affordable housing within the LGA as a component of an LHS.

2. The LSPS commits to developing a Local Housing Strategy (LHS)

The LSPS should commit to developing a comprehensive LHS based on current housing growth, housing demand and growth trends. The LSPS should make clear that the LHS will identify and prioritise areas for growth. The LSPS should also state that the LHS will integrate principles related to affordable housing, including potentially a Local Affordable Housing Strategy and/or specific Affordable Housing programs.

3. The LSPS commits to addressing housing affordability, including through a local strategy and/or programs for growth in dwellings that are affordable to those on the lowest incomes, ideally through Affordable Housing products.

³ See <https://www.shelternsw.org.au/blog/exhibition-of-draft-local-strategic-planning-statements>

Given the need identified in #1, the LSPS should recognise that increasing the number of affordable dwellings in the area is a key component of liveability and a strategic priority in the context of the LSPS. The LSPS should commit to locally appropriate strategies for growing the number of dwellings that are affordable to people on very low to moderate incomes. This can include planning mechanisms that encourage housing diversity but shouldn't be limited to them as they are unlikely to address the affordable housing need without further targeted intervention (see principle #4).

Ideally these strategies should identify opportunities for delivery of affordable housing dwellings in the area, financed through planning mechanisms such as

SEPP 70/Affordable Housing Contribution Schemes

Voluntary Planning Agreements

Section 7.11 contributions

A commitment to seeking approval for SEPP 70 schemes is strongly desirable.

A commitment to other value capture mechanisms that allow for delivery of affordable housing through rezoning is also strongly desirable, however, might not be practical for all local government areas due to differences in rezoning potential.

4. The LSPS commits to housing diversity

The LSPS should commit to the promotion or facilitation of housing diversity through local planning controls and initiatives. This ensures housing supply is diverse and provides housing choice to diverse community members. This may have an effect on housing affordability but shouldn't be the only strategy included in the LSPS to address housing affordability issues. Indeed, it is extremely difficult to assess whether promotion of housing diversity through local planning controls and initiatives will affect private market affordability. It is also extremely unlikely to improve housing affordability for very low- and low-income households.

The LSPS should also commit to new residential development that caters to households with specific accessibility and adaptability needs.

5. The LSPS commits to social diversity

The LSPS should recognise that culturally and socially diverse communities are inclusive, healthy and creative. This precludes any LSPS, and additional strategic planning identified for development in the LHS, from concentrating growth in affordable housing stock in specific parts or precincts within the LGA. Ideally this means a percentage of all new residential development should be dedicated to affordable housing, preferably delivered on site, to ensure social mix.

6. The LSPS recommends further advocacy from local government for social and affordable housing

The LSPS should recognise that housing affordability is a complex issue that needs to be tackled by all levels of government. The LSPS should recommend further advocacy by Council to the NSW and Australian Governments for more social and affordable housing to be developed in the local area, to be funded by mechanisms outside of the planning system such as state and federal budgets.

This might also include recommendations for Council to tackle housing affordability issues at the metropolitan and regional level, for example through collaboration with other LGAs, to advocate for development of a Regional Affordable Housing Strategy to operate across council borders.

Analysis and Recommendations

1. Shelter NSW strongly supports the inclusion of affordable housing as a planning priority in the Camden LSPS

At the outset, Shelter NSW congratulates Camden Council for the development of the draft Local Strategic Planning Statement (LSPS) and that affordable and diverse housing is valued and recognised by Council as critical in maintaining and improving liveability;

“Maintaining and improving liveability means providing housing, infrastructure and services that meet people’s needs, and the provision of a range of housing types in the right places with measures to improve affordability. This enables people to stay in their neighbourhoods and communities as they transition through life.”⁴

The LSPS positions Camden to leverage economic opportunities, ensuring that housing (in terms of both affordability and diversity) can support the diverse needs of the community - young people, families, older people, people living with disability, low to moderate income workers, students and low income households – and will assist Camden to grow without displacing locals as housing costs rise.

Shelter NSW notes that diversity of housing is recognised in the LSPS vision and that housing affordability is specifically addressed in Local Priority 7 – Providing housing choice and affordability for Camden’s growing population.

Shelter NSW strongly supports Council’s commitment to develop a Local Housing Strategy (LHS) and we also urge Camden Council to develop an Affordable Housing Strategy and an Affordable Housing Contributions Scheme. Camden Council is has a good opportunity to plan for affordable and diverse housing through a number of significant master-planning processes and collaborations (for example, the Western Sydney City Deal and the Leppington Planned Precinct). This opportunity to include affordable and diverse housing will assist Camden to better respond to the flow-on effects of new infrastructure

⁴ Page 36, Draft Local Strategic Planning Statement, 2019 Camden Council

and economic growth that will increase demand for housing and will invariably push up housing costs (including rents).

The development of a LHS and an Affordable Housing Strategy will provide an opportunity to focus on the complexity of housing affordability and to develop a comprehensive strategy to respond to the current and future housing needs of the Camden community.

While the health and well-being benefits of secure and affordable housing are understood, the economic benefits of affordable housing are also significant but perhaps not as well understood.

Shelter NSW' position is that affordable housing is critical social and economic infrastructure that supports economic as well as social wellbeing, as demonstrated by recent research by City Futures Research Centre (and led by Community Housing Industry Association of NSW, to which Shelter NSW was a funding partner). The *Strengthening Economic Cases for Housing Policies*⁵ research report models the significant economic and productivity gains that could be expected from a large scale program of Government investment in housing that is both well located and affordable. While it is not within the scope of local government to develop a program on the scale that has been modelled, the results of this research should give local Councils and their Planners greater confidence that Affordable Housing Contribution Schemes, designed to fund a local affordable housing program, will have discernibly positive economic impacts at the local level. Shelter NSW strongly advocates that affordable housing should be seen as critical social and economic infrastructure rather than seen as a “welfare” policy response. In this vein we would suggest that decision makers including Councils should harness this thinking in their policy and planning, as well as in the messaging to local communities so that the benefits of affordable housing are promoted and better understood.

In addition to the importance of affordable housing for maintaining and improving liveability, providing affordable housing is important to support Planning Priority 11 – Promote a robust economy which generates diverse services and job opportunities.

Affordable housing is important infrastructure which intersects with many of the priorities identified in the LSPS including;

- Encouraging vibrant centres;
- Supporting arts and culture;
- Supporting a night time economy;
- Increasing tourism.

⁵ Maclennan, D., Randolph, B., Crommelin, L., Witte, E., Klestov, P., Scealy, B., Brown, S. (2019) *Strengthening Economic Cases for Housing Policies*, City Futures Research Centre UNSW Built Environment, Sydney, <https://cityfutures.be.unsw.edu.au/research/projects/strengthening-economic-cases-housing-productivity-gains-better-housing-outcomes/>

Having housing that is affordable across all incomes, especially low to moderate incomes, will give employers located in town centres and businesses that support arts, culture, tourism and a night time economy, access to a local and diverse workforce.

In the draft LSPS Council has also identified the flow-on effects of the Aerotropolis for Camden and the opportunities to leverage new industries. Having access to a diverse local workforce will assist Council to make the most of the opportunities that these new industries will bring. Having affordable housing in close proximity to the new industries will enable locals to access new jobs and minimises congestion on local transport infrastructure from workers who need to commute to their jobs. The provision of well placed affordable housing will help to support growth while mitigating some of the negative impacts that often come with growth.

2. A Local Housing Strategy should include measures to increase affordable housing in Camden

Shelter NSW commends Council's recognition that "the increasing demand for affordable housing must be considered as part of the broader review of housing supply and demand in Camden". We strongly urge Council to develop an Affordable Housing Strategy and an Affordable Housing Contributions Scheme. Camden Council is forecast to have the largest housing growth (2006 – 2036) of any metropolitan Sydney Council. A Local Housing Strategy and an Affordable Housing Strategy will be important to ensure the community is able to leverage the opportunities this housing growth can bring and also mitigate some of the consequences of rapid growth such as unaffordable housing and congestion.

Include detailed housing information and analysis in Camden LHS and Affordable Housing Strategy

To understand the housing needs of the Camden community Shelter NSW recommends the following information and analysis should be included in the Camden LHS and Affordable Housing Strategy;

- Comprehensive demographic profile – in addition to the demographic information already included in the LSPS, Shelter NSW recommends including the number of people living with disability in Camden
- Local affordability profile – including the latest rent and sales data⁶ and the proportion of Camden households experience housing stress (including rental stress);
- Expected waiting times for social housing⁷;
- Recent housing supply trends;
- Housing demand forecast including for affordable housing;
- Capacity assessment;
- Affordable housing supply – including the number of affordable housing supplied to date.

⁶ Rent and Sales Report for March 2019 Quarter, FACS: <https://www.facs.nsw.gov.au/download?file=664499>

⁷ Expected Waiting Times Dashboard; <https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times>

Investigate a suite of planning and non planning mechanisms to deliver affordable housing

Shelter NSW recognises that while Councils are not able to directly deliver social and affordable housing to any large scale, Councils have access to a number of planning and non planning mechanisms to promote and deliver affordable housing. It's important that the provision of affordable housing is actively and intentionally promoted by Councils with dedicated strategies and identified targets. Any reliance or expectation that the delivery of additional affordable housing will simply come about as a result of increased housing supply would be ill informed. Recent research from the Australian Housing and Urban Research Institute (AHURI) found that increasing supply has done little to improve housing affordability:

*Most of the growth in housing supply has been taking place in mid-to-high price segments, rather than low price segments. There seems to be structural impediments to the trickle-down of new housing supply. Targeted government intervention might be needed in order to ensure an adequate supply of affordable housing.*⁸

There are a range of actions and strategies that can be used to promote and deliver affordable housing and we urge Camden Council to investigate a suite of measures in the development of the LHS and Affordable Housing Strategy, including:

- Inclusionary zoning for all new developments, especially in strategic centres and town centres;
- Prepare a SEPP 70 affordable housing contributions scheme;
- Density bonuses in exchange for affordable housing contributions;
- Voluntary Planning Agreements to capture a proportion of value uplift;
- Affordable Rental Housing SEPP;
- Collaborations with Community Housing Providers;
- Provide exemptions for Community Housing Providers delivering affordable housing in Camden from section 7-11 contributions;
- Set an Affordable Rental Housing Target;
- Use Council owned land for affordable housing;

⁸ Ong, R., Dalton, T., Gurran, N., Phelps, C., Rowley, S. and Wood, G. (2017) *Housing supply responsiveness in Australia: distribution, drivers and institutional settings*, AHURI Final Report No. 281, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/281>

- Advocate to State and Federal Government for more investment in social and affordable housing;
- Advocate to the State Government to reform no-grounds evictions to give tenants in the private rental sector more security of tenure.

3. Include adaptable housing and universal design features in housing and infrastructure for less mobile households

Given that there will be a 33% proportional increase in Camden residents aged 65 years and older, Shelter NSW recommends the LHS and Affordable Housing Strategy include actions to deliver adaptable housing to enable Camden's expanding ageing population to age in place. Shelter NSW also recommends Council identify opportunities to ensure current and future housing meets the needs of Camden residents living with disability.

Planning controls should include reference to the levels of the Liveable Housing Design Guidelines (LHGD) from Liveable Housing Australia⁹. We recommend the inclusion of more specific guidance around delivery of residential dwellings informed by universal design principles, either in the LHS and then the DCP:

- That a significant proportion of new residential development achieves the silver level of the LHDG, allowing 'visitability' of dwellings for people with mobility issues;
- That a proportion of all new residential development achieves the gold or platinum level of the LHDG.

Accessibility of public space and universal, inclusive design are also of primary importance to support good access to infrastructure and to ensure that Camden Council can provide high levels of amenity and liveability. The Seven Principles of Universal Design¹⁰, can be referenced to support Council's housing options for older people and people living with disability.

4. Regular monitoring and reporting and inclusion of additional housing affordability measures

Shelter NSW recommends Camden Council include housing diversity and affordability measures in the LHS for monitoring including:

- decrease in proportion of residents of the LGA in housing stress (includes rental stress);
- decrease in unmet affordable housing need;
- increase in proportion/number of dwellings that are affordable to people on low to moderate incomes;

⁹ See <http://www.livablehousingaustralia.org.au/95/downloads.aspx>

¹⁰ See Centre for Excellence in Universal Design, <http://universaldesign.ie/What-is-Universal-Design/The-7-Principles/>

- increase in the proportion/number of adaptable dwellings.

Shelter NSW also recommends regular reviews of the LHS and Affordable Housing Strategy - every 3 to 5 years – to ensure the LHS adapts to the changing needs of the Camden community.

Further discussion

Thank you for the opportunity to take part in the formulation of the draft Camden Local Strategic Planning Statement. Shelter NSW, as a housing policy and advocacy peak is keen to continue to work with and support Council on the further development of the LSPS and the LHS. Please do not hesitate to contact Thomas Chailloux on (02) 9267 5733 or thomas@shelternsw.org.au in the first instance if you wish to discuss these comments.

Yours sincerely



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