

November 2021

SUBMISSION

Tweed Regional City Action Plan

About Shelter NSW

Shelter NSW has been operating since 1975 as the state’s peak housing policy and advocacy body. Our vision is to create a sustainable housing system that provides secure homes for all.

We pursue our vision through critical engagement with policy, practice, and thought leadership. We provide systemic advocacy and advice on policy and legislation for the whole NSW housing system to resolve housing inequality.

We are especially concerned for low-income households which struggle to afford good-quality and well-located housing in the private market.

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.

We consider a sustainable housing system one that delivers what we call *Triple-A housing* and *Triple-P outcomes*. At Shelter NSW, we believe that all people deserve to live in housing that delivers these priorities and objectives. We assert for example, that someone renting has as much right to secure, affordable, and sustainable housing as someone who owns their own property. We believe the housing system should be ‘tenure blind’ – delivering outcomes for all.

OUR PRIORITIES OBJECTIVES – TRIPLE-A HOUSING

Affordable and diverse homes	Accessible and well-located housing	Appropriate and high-quality development
Housing supply and demand	Proximity to jobs and services	Amenity and aesthetics
Tenure forms and rights	Access to public transport	Energy and environment
Housing types and sizes	Accessibility and adaptability	Standards and maintenance

OUR OBJECTIVES – TRIPLE-P OUTCOMES

Productive cities and regions	Poverty-free communities	Protected neighbourhoods
Access to jobs and services	Housing stress and homelessness	Energy use and consumption
Housing costs and consumption	Well-being and social connection	Urban heat
Financial and economic stability	Education access and attainment	Climate resilience and adaptation



Level 1 241 Castlereagh Street SYDNEY NSW 2000

www.shelternsw.org.au | 02 9267 5733 | admin@shelternsw.org.au

About our submission

Shelter NSW thanks the NSW Department of Planning, Industry, and Environment ('DPIE') for the opportunity to comment on the draft Tweed Regional City Action Plan ('TRCAP').

The Australian housing market has moved a long way from what many would say is its inherent and essential purpose – to provide secure, functional, and affordable shelter to all people at various stages of their lives. Housing is now considered a financial product or a wealth-generating vehicle. The private housing market in this country is consistently and persistently failing to provide secure, well-located, and affordable shelter especially for the lowest 40 percent of income earners.

Given our firmly held position that the private market fails to provide enough quality, well-located, affordable housing, we call on governments to make an urgent and widespread investment in social housing acquisition and construction. This is consistent with Infrastructure Australia's report¹ explicitly identifying the subpar quality, supply, and design of social housing across the country. The same report notes the projected need for almost 730,000 new social housing properties over the next 15 years (with current social housing stock only 4% of Australia's total housing compared to the OECD average of 6%). Further, Garry Fielding's Regional Housing Taskforce recommendations report to Minister Rob Stokes calls for the NSW Government to "consider social and affordable housing as essential social and economic infrastructure"².

Shelter NSW has strengthened its interest in and advocacy for regional housing solutions in NSW. In May 2021, we formally engaged the Regional Australia Institute ('RAI') to undertake a review of every local government area in regional NSW. The final report from RAI was published and distributed to our network last week. The Tweed Shire is one of 11 top LGAs of concern when it comes to housing pressures in regional NSW. We have outlined the implications of this needs-assessment of Tweed in our submission.

We attended a community workshop event via Zoom on Wednesday, 10 November in relation to the TRCAP. Our submission reiterates some of the points and recommendations raised during the workshop event. In addition to providing some commentary on the TRCAP, we offer food-for-thought for the pending Tweed Housing Strategy.

¹ Australian Government, Infrastructure Australia. (September 2021, p. 19). *Reform to meet Australia's future infrastructure needs: 2021 Australian Infrastructure Plan*. Retrieved from <https://www.infrastructureaustralia.gov.au/publications/2021-australian-infrastructure-plan>

² Fielding, G. (October 2021, p. 5). *Regional Housing Taskforce: Recommendations Report*. Retrieved from <https://www.planningportal.nsw.gov.au/regional-housing>

Tweed Shire – our assessment of housing need

At the population level, regional and rural communities are often home to an ageing demographic which increasingly wants to age-in-place (this is considered best practice and reflected in the Aged Care Royal Commission's recommendation to increase in-home aged care by 80,000 new packages into 2022)³. Downsizers, ex-farmers, and older people in general will need housing which is easy to maintain, affordable and well-located with respect to key health and social services. Tweed is no different in this respect; it is anticipated that population growth will be highest in the 65+ year age group than any other cohort in the coming years (with some decline in the <35 year age cohort)⁴.

Single-parent families and households in mortgage or rental stress are overrepresented in the Tweed Shire, compared to the rest of the State⁵. Meanwhile, the proportion of dwellings as social housing stock is only 2.5%, well below many other local government areas in regional NSW. Shelter routinely advocates for at least 5% of all dwellings in all LGAs to be social housing. Compounding the issue of relatively low social housing stock is the high number of social housing applicants on a waitlist in Tweed (961 people) and waitlist times of 10+ years for most dwelling types (1, 2, and 3 bedroom dwellings)⁶.

Due to the above factors (and other parameters outlined in our housing-need report), the Tweed Shire is ranked in joint-sixth position as an LGA of highest housing need in regional NSW. Shelter NSW is of the view that the most effective way of improving Tweed's positioning is through the rollout of an extensive social housing acquirement/construction program and affordable rental housing scheme.

Delivery of social and affordable rental housing needs to occur in a holistic way with infill development opportunities and not purely greenfield rezoning. AHURI's report on older people (55+ age) in public housing⁷ demonstrates that this cohort are tenants in mostly detached (37% of NSW public housing tenancies) or semi-detached (29%) dwelling houses. Greenfield estate development has long been on the Americanised trajectory of sprawling, detached, single-storey 'McMansions' with limited footpath infrastructure, heavy car reliance, and no minimum estate-wide targets for universally accessible design. Poorly designed suburban sprawl estates are incompatible with an ageing population, provision of cost-effective infrastructure, and climate change more generally. The lack of diversified

³ Royal Commission into Aged Care Quality and Safety. (February 26, 2021). *Final Report - Recommendation 39*. Retrieved from

https://agedcare.royalcommission.gov.au/sites/default/files/2021-03/final-report-volume-1_0.pdf

⁴ Shelter NSW in partnership with Regional Australia Institute. (November 2021, p. 25). *New South Wales Regional Housing Need Report*. Retrieved from: <https://sheltersnw.org.au/wp-content/uploads/2021/11/NSW-Regional-Housing-Need-Report.pdf>

⁵ Ibid, p. 25.

⁶ Ibid, pp. 13, 14, 25.

⁷ Australian Housing and Urban Research Institute ('AHURI'). (November 2021, p. 31). *Final Report No 369: Ageing well in public housing*. Retrieved from

https://www.ahuri.edu.au/sites/default/files/documents/2021-11/AHURI-Final-Report-369-Ageing-well-in-public-housing_0.pdf

housing in regional centres is at odds with ABS data indicating the number of people per household in regional locations is more conducive to 1-to-2 bedroom dwellings⁸.

The AHURI regional research⁹ supports this observation, noting many growing regional towns are experiencing land use pressure and sprawl. There needs to be a new focus on residential infill development and increased densities in selected locations rather than the observed tendency to instead use greenfield sites for new residential subdivisions. Diversity of housing and tenure choice would support a strong attraction and retention strategy for young workers.

All-in-all, 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 the same communities which they serve.

Tweed Regional City Action Plan ('TRCAP')

Strategic alignment and division of responsibilities – local and state government

The relationship between the proposed TRCAP and existing Local Strategic Planning Statement ('LSPS') is not clear. There is alignment in planning priorities between parts of the LSPS and the TRCAP, however, there is no cohesive timeline for achieving and working toward completion of actions. For example, the LSPS finalised in 2020 identified actions 16.1 through to 16.6 on housing affordability and diversity and these actions are mostly echoed in draft TRCAP actions 2.1 to 2.3.

The division of responsibilities between local and state government for delivering on strategic plans and outcomes for housing is not intuitive, particularly for laypeople. There is an acknowledgement in both documents that a Local Housing Strategy is to be developed, but no indicative timeline is provided. It is not clear how the TRCAP, if finalised before a Local Housing Strategy, would influence the Local Housing Strategy and vice versa. The 'vice versa' aspect of this is important, as the research phase for the Local Housing Strategy may uncover new priorities that need to be incorporated into the TRCAP in a timely manner.

Recommendations:

- Make clear the relationship between TRCAP, LSPS, and future Housing Strategy
- Make clear the division of responsibilities between local and state government, particularly when it comes to social and affordable rental housing and housing diversity.

⁸ Australian Bureau of Statistics. (2011-2016). *Census of Population and Housing (Enumerated)*. Compiled and presented in profile.id, retrieved from

<https://profile.id.com.au/australia/population?WebID=180>

⁹ AHURI. (August 2021, p. 69). *Final Report No. 362 Population growth, regional connectivity, and city planning—international lessons for Australian practice*. Retrieved from

<https://www.ahuri.edu.au/sites/default/files/documents/2021-09/AHURI-Final-Report-362-Population-growth-regional-connectivity-and-city-planning.pdf>

The TRCAP vision and objectives

Shelter NSW commends DPIE for presenting a bold vision for the Tweed city (including Tweed Heads and Tweed Heads South), and for including the specific objective:

to facilitate housing choice in distinctive, well-connected centres

Any new suburban growth areas must be well-connected to key health, commercial, education, recreation, employment, and social hubs to ensure sociospatial disadvantage is not ingrained in the urban fabric of Tweed. It is noted that Terranora and Bilambil Heights are earmarked to accommodate future urban growth areas/greenfield development. Yet, under the objective “to develop an integrated place-based transport network that delivers a connected Tweed”, these urban growth areas do not appear to be prioritised with public transport linkages and only active transportation (not defined in TRCAP) is indicated for Terranora and Bilambil Heights. It is understood from the TRCAP that ongoing discussions for cross-border transport strategies are underway. These discussions and outcomes must include genuinely connected communities, especially in the case of provisioning transport infrastructure for the Cobaki Lakes suburb.

Climate change and flood modelling must also be considered when considering the tenuous infrastructure connection these suburban growth areas will have with other key parts of Tweed City. The vision maps in the TRCAP indicate “important farmland”, yet areas of ecological importance in and around Tweed are not similarly delimited. Significant consideration should be given to biodiversity and ecological fragmentation in association with proposed urban growth areas, and these considerations must be transparently displayed in the TRCAP.

Recommendations:

- Release supplementary information to the TRCAP on public transport infrastructure provisions (beyond light rail, including suburban bus route augmentation) and what active transport is proposed (footpaths, dedicated bike paths)
- Enhance vision maps to portray modelled climate hazards (flooding, storm surge events) and ecological areas of importance, particularly as these layers relate to urban growth areas.

TRCAP actions

We advocate for infill development to be a primary housing and urban renewal option in regional towns and cities. Our submission to the Regional Housing Taskforce¹⁰ in September 2021 included the recommendation for land use zoning typologies to be reimaged for regional and rural settings, with diminishing prevalence of land zones that promote sprawl in LEPs.

Action 1.4 of TRCAP encourages:

¹⁰ Shelter NSW. (September 2021). *Regional Housing Taskforce submission*. Retrieved from <https://shelternsw.org.au/wp-content/uploads/2021/09/Regional-Housing-Taskforce-Shelter-NSW-submission.pdf>

the consolidation of urban development within existing zoned areas to maximise cost effective and efficient use of infrastructure and contribute to more sustainable development outcomes

In this vein, we believe an additional action should be included to assess the viability of certain land zone typologies (R2 and R5 zones at urban fringes when compared to R1, RU-, and E-zones) and increase preference for other land zone typologies (R3 and B4 near commercial cores and employment hubs) in the Tweed LEP. This action should specifically mention the role of the Local Housing Strategy in auditing land use zone typologies.

Infill development opportunities must be explored in conjunction with Department of Communities and Justice ('DCJ') and community housing providers, and incentives offered to private developers to dedicate affordable rental housing in these infill sites (either through Planning Agreements or an Affordable Housing Contributions Scheme). We note that the FAQ¹¹ page associated with TRCAP talks about "social inclusion... for crisis accommodation", however, crisis accommodation and specific targets/actions for specialist homelessness services are not included in the TRCAP.

The FAQ page also states:

The plan includes a target to ensure 40 per cent of new housing is in the form of dual occupancies, apartments, townhouses, villas or dwellings, on lots less than 400 square metres by 2036. This will accommodate new residents and provide more affordable housing options

No such targets or prescriptions are outlined in the TRCAP. Shelter NSW would like to see these targets enshrined in the TRCAP, and housing diversity to be increased to 50 percent of new housing not being "dwelling houses" as defined in the Standard Instrument LEP (and further subject to any revisions proposed by a Local Housing Strategy).

Recommendations:

- Place greater emphasis on infill social and affordable housing and set a starting target of at least 5% of all dwellings in the LGA being social housing, with commitments to scoping Planning Agreement policies and Affordable Housing Contributions Schemes
- Commit to reviewing viability of certain land zone typologies when furthering the objectives of infill development whilst cross-referencing the roles and outcomes of a Local Housing Strategy
- Reconcile FAQ statements with TRCAP (crisis accommodation targets; housing diversity targets)
- Increase housing diversity target of non-"dwelling houses" to at least 50% of all new housing (i.e. at least 50% of new builds to be multi-occupancy dwellings rather than single-occupancy dwellings).

¹¹ DPIE. (October 2021). *Draft Tweed Regional City Action Plan: Frequently asked questions*. Retrieved from <https://www.planning.nsw.gov.au/-/media/Files/DPE/Plans-and-policies/Plans-for-your-area/Regional-plans/Tweed-Draft-RCAP-FAQs.pdf?la=en>

Summary of Recommendations

In progressing the TRCAP, Shelter NSW recommends the following:

- Make clear the relationship between TRCAP, LSPS, and future Housing Strategy
- Make clear the division of responsibilities between local and state government, particularly when it comes to social and affordable rental housing and housing diversity
- Release supplementary information to the TRCAP on public transport infrastructure provisions (beyond light rail, including suburban bus route augmentation) and what active transport is proposed (footpaths, dedicated bike paths)
- Enhance vision maps to portray modelled climate hazards (flooding, storm surge events) and ecological areas of importance, particularly as these layers relate to urban growth areas
- Place greater emphasis on infill social and affordable housing and set a starting target of at least 5% of all dwellings in the LGA being social housing, with commitments to scoping Planning Agreement policies and Affordable Housing Contributions Schemes
- Commit to reviewing viability of certain land zone typologies when furthering the objectives of infill development whilst cross-referencing the roles and outcomes of a Local Housing Strategy
- Reconcile FAQ statements with TRCAP (crisis accommodation targets; housing diversity targets)
- Increase housing diversity target of non-“dwelling houses” to at least 50% of all new housing (i.e. at least 50% of new builds to be multi-occupancy dwellings rather than single-occupancy dwellings).

Thank You

We thank you for the opportunity to provide comment on the Tweed Regional City Action Plan and hope our comments provide some valuable insights to assist with your strategic planning work in the housing space. If you wish to discuss our submission in more detail, please contact Shelter NSW Policy Officer, Kayla Clanchy via email or phone (see below).

Sincerely Yours,



John Engeler

Chief Executive Officer, Shelter NSW

john@shelternsw.org.au

0410 402 212



Kayla Clanchy

Policy Officer, Shelter NSW

kayla@shelternsw.org.au

0435 947 055