

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 everyday citizens. 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.

| | | |
|--------------------------------------|--|---|
| 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 |
| 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 | Physical and mental health | Urban heat |
| Financial and economic stability | Education access and attainment | Climate resilience and adaptation |

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.

About our submission

Shelter NSW thanks the Department of Planning & Environment for the opportunity to comment on the draft *Riverina Murray Regional Plan 2041* ('RMRP'). 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. A recent report jointly prepared by SGS Economics and Housing All Australians¹ has anticipated the cost to the economy of not investing now in social and affordable housing on a large-scale across Australia will be \$25,000,000,000 annually (in 2021 dollars) from 2051 onward. Further, the Regional Housing Taskforce's recommendations report to Minister Anthony Roberts 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. Our investigation found that Wagga Wagga and Albury are in the top twenty LGAs of concern when it comes to housing pressures in regional NSW. **We have outlined the implications of this needs-assessment in our submission.**

We are broadly supportive of the many Strategies and Actions in the Plan. Our submission touches on the need for **firm commitments to augment social and affordable housing stock** in the region, stronger directions to councils in **embedding affordable housing outcomes in Local Housing Strategies**, including **more stakeholders in affordable housing working groups**, providing more opportunities for canvassing **infill residential and innovative housing on publicly-owned land**, better **regulation of short-term rental accommodation**, and more pragmatic and **specific directions for tackling workforce accommodation challenges**.

A summary of our recommendations is included on pages 14 and 15.

Sincerely,

John Engeler

Chief Executive Officer, Shelter NSW

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Policy Officer, Shelter NSW

¹ SGS Economics & Planning, Housing All Australians. (June 2022). *Give Me Shelter: The long-term costs of underproviding public, social and affordable housing*. Retrieved from <https://housingallaustralians.org.au/wp-content/uploads/2022/06/Give-Me-Shelter.pdf>

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

Context: LGAs of high 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. Albury and Wagga are no different; it is anticipated that population growth will be highest in the 75+ year age group in the coming years for both localities⁴.

Migration trends during the COVID-19 pandemic have contributed to a deepening regional housing crisis for NSW⁵. Single-parent families and households in mortgage or rental stress are overrepresented in Albury and Wagga LGAs, compared to the rest of the State⁶. This is particularly concerning, as the *SGS Economics Rental Affordability Index*⁷ found a single-parent family (with one child under five) receiving government parental payments supplemented with casual or part-time work faces "unaffordable" rental constraints in Albury. A single pensioner aged 65 or older seeking to rent a 1-bedroom dwelling in Wagga similarly faces "unaffordable" rental constraints⁸.

Further afield and in reference to the RMRP denoting Griffith, Wagga, and Albury as key population centres in the region, the proportion of dwellings as social housing stock is less than 5 percent⁹ for these cities. All these same LGAs have recorded a real decline in social housing stock numbers between 2011 and 2020. For instance, social housing stock in Wagga has decreased by 8.9% from 1314 to 1197 properties in that period¹⁰. Yet, there are more than 900 people on the general social housing waitlist, waiting between 2 to 10 years for all dwelling types across Albury, Wagga, and Griffith¹¹.

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). *New South Wales Regional Housing Need Report*. Retrieved from <https://shelternsw.org.au/wp-content/uploads/2021/11/NSW-Regional-Housing-Need-Report.pdf>

⁵ Pawson, H., Martin, C., Thompson, S., & Aminpour, F. (2021, p. 45). *COVID-19: Rental housing and homelessness policy impacts*. ACOSS/UNSW Poverty and Inequality Partnership Report No. 12. Retrieved from https://shelternsw.org.au/wp-content/uploads/2021/11/Covid-19_rental-housing-and-homelessness-impacts-in-Australia-24-Nov.pdf

⁶ Shelter NSW in partnership with Regional Australia Institute. (November 2021). *New South Wales Regional Housing Need Report*. Retrieved from <https://shelternsw.org.au/wp-content/uploads/2021/11/NSW-Regional-Housing-Need-Report.pdf>

⁷ SGS Economics. (November 2021). *Rental Affordability Index: Key Findings*. Retrieved from <https://www.sgsep.com.au/sgs-lab/rental-affordability-index> [interactive map]

⁸ Ibid [interactive map]

⁹ Shelter NSW in partnership with Regional Australia Institute. (November 2021). *New South Wales Regional Housing Need Report*. Retrieved from <https://shelternsw.org.au/wp-content/uploads/2021/11/NSW-Regional-Housing-Need-Report.pdf>

¹⁰ NSW Parliament, Legislative Council. (1 March 2021, pp. 59 & 84). *Budget Estimates 2020-2021 Portfolio Committee No. 4 Industry: Answers to supplementary questions (Pavey)*. Retrieved from <https://www.parliament.nsw.gov.au/lcdocs/other/15376/Answers%20to%20supplementary%20questions%20-%20Pavey.pdf>

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

Due to the above factors (and other parameters outlined in our housing-need report), **Wagga and Albury are ranked joint-ninth and joint-tenth (respectively) out of all regional LGAs in our report on areas of high housing need**¹². Shelter NSW is of the view that the most effective way of improving the housing situation in these localities is through the rollout of:

- an extensive social housing acquirement/construction program,
- setting specific targets to increase affordable rental housing stock,
- Affordable Housing Contributions Schemes or fit-for-purpose and transparent Affordable Housing Planning Agreement Policies,
- well-resourced and diverse membership of affordable housing working groups,
- collated, mixed use, residential infill strategies targeting specific sites in established towns/cities and satellite villages,
- better policy responses to short-term holiday rental accommodation,
- strategic approaches to assessing and anticipating cumulative impacts on housing for local residents from major projects,
- more hands-on assistance to under-resourced and under-staffed local councils, and
- public land dedicated to community lands trusts or other non-market housing.

Commit to augmenting social and affordable housing

Affordable housing

The term 'affordable housing' is defined in the NSW planning system as:

*Housing for very low income households, low income households or moderate income households, being such households as are prescribed by the regulations or as are provided for in an environmental planning instrument.*¹³

Affordable housing is not necessarily public or community housing ('public' and 'community' housing both come under the umbrella of 'social' housing¹⁴). Affordable housing can be funded (and delivered) by local councils, particularly where private development must contribute funds/land/dwellings for the purposes of affordable housing.

¹² Shelter NSW in partnership with Regional Australia Institute. (November 2021). *New South Wales Regional Housing Need Report*. Retrieved from <https://sheltersnsw.org.au/wp-content/uploads/2021/11/NSW-Regional-Housing-Need-Report.pdf>

¹³ NSW Government. (current version December 1, 2021). *Environmental Planning and Assessment Act 1979 No 203*, s1.4 Definitions. Retrieved from <https://legislation.nsw.gov.au/view/whole/html/inforce/current/act-1979-203>

¹⁴ NSW Government. (current version November 26, 2021). *State Environmental Planning Policy (Housing) 2021*, Dictionary="social housing provider". Retrieved from <https://legislation.nsw.gov.au/view/whole/html/inforce/current/epi-2021-0714>

Affordable housing is nearly always affordable rental housing. A greater variety of households may be eligible for affordable rental housing than social housing. Indeed, income brackets for affordable rental housing eligibility tends to include key workers such as teachers, nurses, aged care workers, trade apprentices, and other industry workers who are essential to local communities. Providing more housing opportunities for these working cohorts is therefore imperative to advancing any region's economic growth goals.

The NSW Department of Planning & Environment can and should assist local Councils in scoping out the viability of creating Affordable Housing Contributions Schemes or Affordable Housing Planning Agreement Policies.

The Regional NSW Housing Taskforce initial findings report¹⁵ acknowledges that using the Department's viability tool for Affordable Housing Contributions Schemes can be cumbersome and that more training for regional planners is required to ensure the tool can be practically used. Additionally, the Department has a ministerial direction and practice note setting out the need for an underlying local Planning Agreement policy to be in place before negotiating any planning agreements¹⁶. It is not known whether specific guidance and resources are provided by the Department to local Councils on crafting policies for Affordable Housing Planning Agreements.

Social housing

The intent of both public and community housing (as subsets of social housing) is to accommodate people on very low, low, and moderate incomes in affordable housing. Social housing renewal and augmentation is a State responsibility and in 2022, our ask of the NSW Government in this respect is to:

1. Fast track investment in social housing to prevent homelessness and support economic recovery across the state (including in regional areas):
 - a) Build or acquire 5,000 additional units of social housing each year for the next 10 years to address the current backlog and enable an effective response to the growing demand
 - b) Invest \$500 million in an expanded repairs and maintenance program for existing social housing stock. This would include upgrades to inefficient fixtures (water, heating and cooling) and improve the thermal performance of existing social housing stock

¹⁵ Fielding, G. (September 2021, pp. 35 & 36). *Regional Housing Taskforce: Initial Findings Report*. Retrieved from <https://www.planningportal.nsw.gov.au/regional-housing>

¹⁶ NSW Government. (February 28, 2019). *Ministerial Direction: Environmental Planning and Assessment (Planning Agreements) Direction 2018*. Retrieved from <https://www.planning.nsw.gov.au/-/media/Files/DPE/Directions/ministerial-direction-s7-9-environmental-planning-and-assessment-planning-agreements-2019-06-11.pdf?la=en> ; NSW Government. (February 2021). *Planning Agreements: Practice note*. Retrieved from <https://www.planning.nsw.gov.au/-/media/Files/DPE/Practice-notes/practice-note-planning-agreements-2021-02.pdf?la=en>

- c) Build three new Youth Foyers in NSW providing integrated housing, education and employment support to vulnerable young people otherwise at risk of homelessness.

In addition to the above, **Shelter NSW routinely advocates for at least 5% of all dwellings in all LGAs to be social housing.** We note that the Plan is silent on aspirations to augment social housing stock in the region.

Social and affordable housing targets

The Plan lacks specific numeric targets to increase social and affordable housing stock. By contrast, the recently exhibited *Draft Central Coast Regional Plan 2041* included the following affordable housing targets¹⁷:

Central Coast affordable housing targets

| | Small renting | Family renting | Small purchasing | Family purchasing |
|--|-------------------|-------------------|------------------|-------------------|
| Affordable to very low income households | 8,000 (+1,900) | 5,900 (+1,400) | 2,100 (+500) | 1,400 (+500) |
| Affordable to low income households | 2,100 (+500) | 3,800 (+900) | 1,900 (+500) | 2,300 (+600) |
| Affordable to moderate income households | 500 (+100) | 900 (+100) | 800 (+200) | 1,800 (+400) |

The RMRP includes a 2017 figure with respect to the stock of “affordable housing” in the region (page 29).

As outlined previously in this submission, there is a substantial waitlist for social housing in the region and increasing affordability constraints on lower-income households in the private rental market. Given the significant housing challenges facing the Riverina Murray, Shelter strongly suggests the Plan embed its own suite of targets in collaboration with Department of Communities and Justice, AHO, and local Councils.

Building on the above example from the *Central Coast Regional Plan 2041*, it would be useful for the Department to outline in conjunction with any affordable housing targets:

- what is meant by ‘affordable’ versus ‘social housing’ in the RMRP,
- whether any instituted numeric targets are a mix of social and affordable housing, and
- what proportion of the targets will remain ‘affordable’ in perpetuity.

¹⁷ NSW Department of Planning & Environment. (December 2021, p. 41). *Draft Central Coast Regional Plan 2041*. Retrieved from <https://dpe.mysocialpinpoint.com.au/central-coast-2041>

It would be pertinent for the Implementation Plan linked to the RMRP to outline how/when these targets will be delivered and by whom.

Recommendations

- Provide more hands-on assistance to local councils in developing/implementing Affordable Housing Contributions Schemes and Affordable Housing Contributions Policies, and indeed make clear the difference between these two mechanisms in delivering affordable rental housing outcomes
- Embed an 'affordable housing targets' table in the Plan, similar to *Central Coast Regional Plan 2041*
- Make clear in the Plan what is meant by 'affordable housing' with reference to an embedded 'affordable housing targets' table
- Delineate the proposed mix of social and affordable rental housing in the targets table of the Plan, including social housing set aside for First Nations households
- State what proportion of 'affordable housing' will be affordable in perpetuity
- Include details in the Implementation Plan on how/when affordable housing targets will be reached and by whom
- Set an additional target of at least 5% of all dwellings in each LGA in the Riverina Murray Region being social housing with a region-wide target of 10% of all dwellings being social housing by 2041.

Local Housing Strategies ('LHS')

Shelter NSW supports the requirement in the RMRP for Local Housing Strategies to be developed for certain councils, including Albury and Wagga Wagga per Strategy 5.1 and Council Activity 5.1. We also note Strategy 5.2 recommends the consideration for local affordable housing strategies be developed in complement or as part of broader Local Housing Strategies. We suggest Strategy 5.2 be enhanced to **specifically call on Albury and Wagga Councils to develop Affordable Housing Strategies**, with remit to consider creating Affordable Housing Contributions Schemes or Affordable Housing Planning Agreements Policies.

Collaboration Activity 5 states:

The department will establish a working group with relevant local and state agencies to investigate the issues and extent of housing affordability across the region and identify opportunities for land use planning to improve housing affordability outcomes.

Other draft Regional Plans to 2041¹⁸ (including *New England North West* and *North Coast*) have proposed housing affordability roundtables to be established, oftentimes including

¹⁸ NSW Department of Planning. (2022). *Regional plans*. Retrieved from <https://www.planning.nsw.gov.au/Plans-for-your-area/Regional-Plans>

Local Aboriginal Land Councils ('LALCs') and Community Housing Providers ('CHPs'). Collaboration Activity 5 could be strengthened in this regard to better inform Local Housing Strategies, Affordable Housing Policies, and timely solutions to acute housing need in the region.

As an aside, Shelter NSW notes that the LHS Tracker on the Department website currently only caters to Greater Sydney council areas. For increased accountability, we recommend the Department make the Tracker a truly centralised repository of all Local Housing Strategies in the state by including regional council Local Housing Strategies and their implementation statuses.

Recommendations

- Expand scope of Strategy 5.2 to specifically call on Albury and Wagga Councils to develop Affordable Housing Strategies, with remit to consider creating Affordable Housing Contributions Schemes or Affordable Housing Planning Agreements Policies
- Strengthen Collaboration Activity 5 by extending affordable housing working group invites to LALCs, CHPs, community groups such as the Country Womens Association, and other local charities
- Foster the working group under Collaboration Activity 5 to be a key resource for informing Local Housing Strategies, Affordable Housing Strategies, and timely solutions to acute housing need in the region
- Enhance LHS Tracker on the Department of Planning's website by including all Local Housing Strategies and their statuses (including regional councils).

Promoting infill, non-sprawling residential development

Shelter NSW advocates for infill development to be a primary housing and urban renewal option in regional towns and cities. 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 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 dwellings¹⁹.

We welcome the many Strategies and Actions that elevate the status of infill residential development for the Region, including this significant direction under Strategy 15.1:

¹⁹ 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>

Strategic and statutory planning for centres will... encourage infill and appropriate medium density residential development close to main streets and centres of small and medium sized towns.

The Plan could, however, be enhanced with indicative infill opportunity maps for key towns and centres.

Infill development opportunities must be explored in conjunction with Department of Communities and Justice (DCJ) and CHPs, and incentives offered to private developers to dedicate affordable rental housing in these infill sites (either through Planning Agreements or Affordable Housing Contributions Schemes).

Further, we are pleased with the sensible acknowledgement in Strategy 6.1 on the need to curb unsustainable and agriculturally disruptive rural residential subdivisions:

Strategic and statutory planning for regional cities will aim to... where strategically justified, transition rural residential development to a standard residential product.

Our submission to the Regional Housing Taskforce²⁰ in September 2021 included the recommendation for land use zoning typologies to be reimagined for regional and rural settings, with diminishing prevalence of land zones that promote sprawl in LEPs. In this vein, **we believe an action should be included in the RMRP to assess the viability of certain land zone typologies** (R2 and R5 zones at urban fringes when compared to R1, RU-, and Enviro zones) and increase preference for other land zone typologies (R3 and Mixed Use near commercial cores and employment hubs) in all Riverina Murray LEPs. This action should specifically mention the role of Local Housing Strategies (under development or review) in auditing land use zone typologies.

Recommendations

- Indicate residential infill opportunities on maps for key centres and smaller towns identified as needing CBD revitalisation treatments (or add this mapping remit to future affordable housing working groups and affordable housing policy scoping exercises)
- Include numeric targets for social and affordable housing properties (with reference to dwelling types/sizes/numbers of bedrooms) in any future infill residential strategies, to ensure new social and affordable housing stock is not relegated only to greenfield development areas
- Commit to reviewing viability of certain land zone typologies when furthering the objectives of infill development whilst cross-referencing the roles and outcomes of Local Housing Strategies.

²⁰ 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>

Short term rental accommodation ('STRA')

We applaud the acknowledgement in the Plan of the difficulties that short term holiday rentals present to securing long-term housing stock for residents (page 28). However, this acknowledgement is not specifically linked to any supporting strategies and actions in the Plan to better regulate Short Term Rental Accommodation ('STRA') in the region. There is a guidance note on page 37 that calls on councils to "implement short-term rental accommodation policies", but this is not explicitly embedded within a Strategy, Collaboration Activity, or Council Activity.

Short-term letting platforms such as Airbnb are marketed toward tourists who can afford (or are willing) to pay a higher price for short term accommodation than residents who are seeking temporary housing. This is evident in the NSW Department of Planning's 2017 Option Paper on regulating short term holiday letting, which went on to form the basis of the STRA provisions in the Affordable Rental Housing SEPP and now the consolidated *Housing SEPP 2021*.

Increasingly in Australia, the type of STRA available on Airbnb is whole-house conversions of investment properties²¹ – presumably from the long-term rental market or owner-occupied premises following a sale to a property investor. Domestic tourism during COVID-19 has significantly increased in many regional towns and locations. The lure of higher-profits per week in converting a dwelling to short-term rental accommodation through easy-to-use platforms such as Airbnb has diverted long-term housing stock from the private rental market and owner-occupier market.

There is an upward trend in the Riverina Murray region for uptake of whole-home Airbnbs and strategic planning is required to ensure tourism aspirations in the Plan under Objective 16 do not galvanise this trend to the detriment of local housing stock:

| LGA/town reference | Number of whole-house STRAs listed on Airbnb - Q2 2019 ²² | Number of whole-house STRAs listed on Airbnb - March 2022 ²³ | Change in residential rental vacancy rates (%) between March 2019-2022 ²⁴ |
|--------------------|--|---|--|
| Tumut Shire | 100 | 120 | -1.3 (1.8 to 0.5 for Tumut) |
| Albury City | 180 | 200 | -1.1 (1.5 to 0.4) |
| Wagga Wagga | 220 | 230 | -2.2 (2.5 to 0.3) |
| Moama-Echuca | <100 | >150 | -0.6 (1.0 to 0.4 for Moama) |

In boom-and-bust resource economies, short-term rental platforms such as Airbnb and Stayz impact the local rental market of regional and rural towns as mining operatives and key industry employers rely on short-term rentals to meet their accommodation needs.

²¹ Sigler, T & Panczak, R. (February 13, 2020). *Ever wondered how many Airbnbs Australia has and where they all are? We have the answers*. Retrieved from <https://theconversation.com/ever-wondered-how-many-airbnbs-australia-has-and-where-they-all-are-we-have-the-answers-129003>

²² AirDNA. (n.d.). *Vacation Rental Data*. Retrieved from <https://www.airdna.co/>

²³ Murray Cox. (n.d.). *Inside Airbnb*. Retrieved from <http://insideairbnb.com/get-the-data.html> ; AirDNA. (n.d.). *Vacation Rental Data*. Retrieved from <https://www.airdna.co/>

²⁴ SQM Research. (n.d.). *Residential Vacancy Rates*. Retrieved from https://sqmresearch.com.au/graph_vacancy.php

We believe greater scrutiny of DA proposals by local and state planners on the social impacts of resource industry proposals for accommodating DIDO/FIFO workforces is therefore required – please refer to the following section **Workforce accommodation and growth** in this submission.

Recommendations

- Embed the guidance note for councils to implement short-term rental accommodation policies into Strategy 5.1 and/or Council Activity 5.1 (when mandating preparation of Local Housing Strategies), particularly for Albury City, Wagga Wagga, Murray River, and Snowy Valleys councils (pending administrative move into *South East & Tablelands Regional Plan*).

Workforce accommodation and growth

There are numerous Strategies (8.1 and 8.2) and Collaboration Activities (7 and 8) in the RMRP that seek to address housing pressures associated with temporary workers and fluctuations in housing demand from large-scale investment projects in the region. It is encouraging to see acknowledgement in the Regional Plan on the affect that major infrastructure, mining, and other industrial investments have on the supply of housing for lower-income locals.

In relation to Collaboration Activity 7, there appears to be an admission that prior decision-makers have not routinely required major project proponents (particularly for State Significant Development) to undertake cumulative impact assessments on housing stock and affordability for locals. Strategies 8.1 and 8.2 seek to remedy this with greater onus to be placed on development proponents to perform more targeted analyses of local housing markets' abilities to absorb workforce fluctuations and – where reasonable – provide permanent accommodation that can be repurposed for local housing stock in the long-term.

Despite the use of imperative language such as 'must' and 'will' in Strategies 8.1 and 8.2, **it is not clear how the directions issued in these Strategies will be applied or referred to in day-to-day development assessment of major projects.** For instance, it is not known if Strategies 8.1 and 8.2 will have immediate effect when assessing all relevant DAs upon the RMRP 2041 being finalised or if these Strategies will only be given 'weight' following the implementation of Collaboration Activities 7 and 8.

The draft *Central West & Orana Regional Plan 2041* on exhibition earlier this year included an Action which should be adapted for inclusion into the RMRP:

Investigate options to ensure new public and private infrastructure, mining and other major employment-related projects plan for workforce accommodation during the lifecycle of the project, by identifying:

- *the workforce required and their accommodation needs*

- *when the workforce will come to the region and how long they will stay*
- *housing, health, education and commercial needs for the workforce and their families*
- *how the project will impact tourism and how this impact will be addressed*
- *housing options to support the surrounding centres and community for the lifetime of the project, including construction and operational phases*
- *opportunities to retain project-related housing as community managed assets in the long term*
- *opportunities for new projects to provide a financial contribution towards the provision of key worker accommodation²⁵*

We are of the view that the above itemised list of workforce accommodation considerations should be embedded in Collaboration Activity 7.

Special Activation Precincts, Regional Job Precincts, Health and Education Precincts, and proposed Renewable Energy Zones will add significant strain to councils when attempting to plan and accommodate new and temporary industry workforces. Physical and human resources may need to be deployed to the Riverina Murray (planners, building certifiers, environmental health officers, and other assessors). We are of the view that Collaboration Activities 15 and 17 do not go far enough in supporting councils to meet these planning and assessment challenges.

The RMRP states a question for discussion on page 9 “How can we better resource planning and related functions?”. To this end, we recommend the **Regional Flying Squad of Planners trialled earlier this year as part of the Regional Housing Taskforce Recommendations be extended indefinitely**. The eligibility criteria for suitable DAs to go to the Flying Squad should also be pared back²⁶ to ensure less ‘front-loading’ of housing and temporary worker accommodation assessments fall to under-resourced local planners, building surveyors, and environmental health officers.

Recommendations

- Clarify the real-life application of Strategies 8.1 and 8.2
- Enhance Collaboration Activity 7 with workforce accommodation consideration points from Action 6 of the draft *Central West & Orana Regional Plan 2041*
- Extend the Regional Housing Flying Squad assistance program for DA assessment beyond 2022
- Revisit the stringent criteria for DAs that can be referred to the Regional Housing Flying Squad to ease impacts on local council officers in having to perform the bulk of upfront development assessments.

²⁵ NSW Government. (2021, p. 53). *Draft Central West & Orana Regional Plan 2041*. Retrieved from <https://dpe.mysocialpinpoint.com.au/central-westorana-2041>

²⁶ NSW Government. (n. d). *Regional Housing Flying Squad*. Retrieved from <https://www.planningportal.nsw.gov.au/regional-housing-flying-squad>

Publicly-owned land and innovative housing

Shelter NSW notes other draft Regional Plans to 2041 (such as *Central West & Orana* and *Central Coast*) include Strategies and Actions for better utilising publicly-owned land for innovative housing pilot projects.

The NSW Government's *Local Government Housing Kit* contains many case studies on innovative, non-market housing approaches²⁷ such as the 'Homes for Homes' initiative which relies on donations from property sales in a community to fund affordable housing projects²⁸. There is also the ACT Suburban Land Agency's rent scheme whereby purchase of land is not required in order to build a home on newly available allotments²⁹. In more recent times, Bellingen alongside Kempsey and Port Macquarie-Hastings Councils are working to establish a community land trust to operate as a not-for-profit organisation, providing housing potentially through co-ownership or a 99-year lease model³⁰.

Recommendations

- Include a Strategy or Action in the Plan for better utilising publicly-owned land for innovative housing pilot projects
- Work with local councils to scope existing or feasible-to-acquire land for community land trust models or other non-market housing.

²⁷ NSW Department of Communities and Justice ('DCJ'). (2019). *Local Government Housing Kit: Module 5 case studies and resources*. Retrieved from <https://www.facs.nsw.gov.au/resources/nsw-local-government-housing-kit/chapters/Local-Government-Housing-Kits-Full-Kit-and-downloadable-modules>

²⁸ Ibid, p. 15

²⁹ Ibid, p. 6

³⁰ Housing Matters Action Group. (n. d.). *Current Projects*. Retrieved from <https://www.housingmatters.org.au/current-projects/>

Summary of recommendations

The recommendations peppered throughout this submission are collated below. Shelter NSW recommends the Department of Planning:

- Provide more hands-on assistance to local councils in developing/implementing Affordable Housing Contributions Schemes and Affordable Housing Contributions Policies, and indeed make clear the difference between these two mechanisms in delivering affordable rental housing outcomes
- Embed an 'affordable housing targets' table in the Plan, similar to *Central Coast Regional Plan 2041*
- Make clear in the Plan what is meant by 'affordable housing' with reference to an embedded 'affordable housing targets' table
- Delineate the proposed mix of social and affordable rental housing in the targets table of the Plan, including social housing set aside for First Nations households
- State what proportion of 'affordable housing' will be affordable in perpetuity
- Include details in the Implementation Plan on how/when affordable housing targets will be reached and by whom
- Set an additional target of at least 5% of all dwellings in each LGA in the Riverina Murray Region being social housing with a region-wide target of 10% of all dwellings being social housing by 2041
- Expand scope of Strategy 5.2 to specifically call on Albury and Wagga Councils to develop Affordable Housing Strategies, with remit to consider creating Affordable Housing Contributions Schemes or Affordable Housing Planning Agreements Policies
- Strengthen Collaboration Activity 5 by extending affordable housing working group invites to LALCs, CHPs, community groups such as the Country Womens Association, and other local charities
- Foster the working group under Collaboration Activity 5 to be a key resource for informing Local Housing Strategies, Affordable Housing Strategies, and timely solutions to acute housing need in the region
- Enhance LHS Tracker on the Department of Planning's website by including all Local Housing Strategies and their statuses (including regional councils)
- Indicate residential infill opportunities on maps for key centres and smaller towns identified as needing CBD revitalisation treatments (or add this mapping remit to future affordable housing working groups and affordable housing policy scoping exercises)

- Include numeric targets for social and affordable housing properties (with reference to dwelling types/sizes/numbers of bedrooms) in any future infill residential strategies, to ensure new social and affordable housing stock is not relegated only to greenfield development areas
- Commit to reviewing viability of certain land zone typologies when furthering the objectives of infill development whilst cross-referencing the roles and outcomes of Local Housing Strategies
- Embed the guidance note for councils to implement short-term rental accommodation policies into Strategy 5.1 and/or Council Activity 5.1 (when mandating preparation of Local Housing Strategies), particularly for Albury City, Wagga Wagga, Murray River, and Snowy Valleys councils (pending administrative move into *South East & Tablelands Regional Plan*).
- Clarify the real-life application of Strategies 8.1 and 8.2
- Enhance Collaboration Activity 7 with workforce accommodation consideration points from Action 6 of the draft *Central West & Orana Regional Plan 2041*
- Extend the Regional Housing Flying Squad assistance program for DA assessment beyond 2022
- Revisit the stringent criteria for DAs that can be referred to the Regional Housing Flying Squad to ease impacts on local council officers in having to perform the bulk of upfront development assessments.
- Include a Strategy or Action in the Plan for better utilising publicly-owned land for innovative housing pilot projects
- Work with local councils to scope existing or feasible-to-acquire land for community land trust models or other non-market housing.