



**Coffs Harbour City Council**

**Shelter NSW submission on *Draft Affordable Housing Strategy***

***A secure home for all***

4 October 2023



## 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 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. We consider a sustainable housing system one that delivers what we call Triple-A housing and Triple-P outcomes.

<b>Affordable and diverse homes</b>	<b>Accessible, well-located housing</b>	<b>Appropriate, high-quality development</b>
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
<b>Productive cities and regions</b>	<b>Poverty-free communities</b>	<b>Protected neighbourhoods</b>
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 believe the housing system should deliver safe, secure, and affordable living outcomes for all, regardless of tenure type.

Please contact Kayla Clanchy, Policy Officer, on any matters related to this submission at [kayla@shelternsw.org.au](mailto:kayla@shelternsw.org.au)

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# 1. About our submission

Shelter NSW thanks Coffs Harbour City Council for the opportunity to comment on the *Draft Affordable Housing Strategy*.

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. Low-income households have little to no capital to buy into the persistently unaffordable and hyper-inflated housing market on the one hand, and face excessive and stressful waits on the State's social housing waiting list on the other hand<sup>1</sup>. This growing gap in suitable tenure type, therefore, has been poorly plugged by an ill-equipped and under-regulated private rental sector.

Given our firmly held position that the private housing market fails to provide appropriate housing, **we call on governments to make an urgent and widespread investment in social and Affordable Housing acquisition and construction**. A report jointly prepared by SGS Economics and Housing All Australians<sup>2</sup> 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.

We therefore congratulate Coffs Harbour's commitment to creating a housing strategy specific to the needs of low-income households requiring Affordable Housing. To our knowledge, Coffs Harbour is one of only a handful of regional Councils taking up this mantle in NSW. The underpinning work on the Draft Strategy by Judith Stubbs & Associates ('JSA') is thorough and practical, and we have made references to the Background Paper and Options Paper by JSA in our submission.

Further, Shelter NSW appreciates the clear distinction in the Draft Strategy as to what constitutes "Affordable Housing" with references to the legislated definitions in the *Environmental Planning and Assessment Act 1979* and the *Housing SEPP 2021*. Affordable Housing with rent-set or mortgage-repayments at no more than 30% of household income is vital in ensuring that housing is **actually** "affordable" for very low, low, and moderate income households. We agree that work needs to be done to guarantee Affordable Rental products are retained as "affordable" in perpetuity rather than reverting to market rates after 10-15 years.

Our submission recognises some sound initiatives proposed in the Draft Strategy, whilst recommending areas for improvement. In particular, we would like to see an expedited process for developing an Affordable Housing Contributions Scheme for greenfield (rural to residential zoning) uplift in the LGA. **A summary of our recommendations begins on page 18 of this submission.**

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<sup>1</sup> Pawson, H. and Lilley, D. (2022). *Managing Access to Social Housing in Australia: Unpacking policy frameworks and service provision outcomes*; CFRC Working Paper; Sydney: UNSW City Futures Research Centre accessed from [City Futures website](#)

<sup>2</sup> 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. Context: LGA of high housing need

Shelter NSW has strengthened its interest in and advocacy for regional housing solutions in NSW. Earlier this year, we released an updated report with Regional Australia Institute ('RAI') on regional NSW LGAs in 'high housing need'. Our investigation found that [Coffs Harbour is ranked 4<sup>th</sup> top locality of concern](#) when it comes to housing pressures in regional NSW. We have outlined the implications of this needs-assessment below.

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 recommendations)<sup>3</sup>. Downsizers, ex-farmers, and older people in general will need housing that is easy to maintain, affordable, and well-located with respect to key health and social services. Coffs Harbour is no different in this respect; it is anticipated that population growth will be highest in the 80+ year age group in the coming years<sup>4</sup>. The Draft Strategy acknowledges there is a chronic mismatch between housing typology and household formation types.

Single-parent families and households in mortgage or rental stress are overrepresented in the Coffs Harbour LGA, compared to the rest of the State<sup>5</sup>. In fact, nearly 80% of low-income households are experiencing rental stress in the LGA<sup>6</sup>. This is particularly concerning, as the *November 2022 SGS Economics Rental Affordability Index*<sup>7</sup> found a single part-time working parent on benefits faces "severe" rental affordability constraints in postcode 2450. We have heard several anecdotes from desperate renters up and down the coast about not being able to compete with other tenants in rent-bidding and offers to pay 6 months of rent upfront – practices which are not illegal.

Migration trends during the COVID-19 pandemic and the ability for Sydney-employed professionals to work remotely contribute to a deepening regional housing crisis for NSW<sup>8</sup>. Locals with lower incomes relative to Sydney-natives have seen rental asking prices skyrocket 20% or more, year on year<sup>9</sup>, and rental vacancy rates drop below 1% for extended periods of time<sup>10</sup>.

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<sup>3</sup> Royal Commission into Aged Care Quality and Safety. (26 February 2021). *Final Report - Recommendation 39*. Retrieved from [https://agedcare.royalcommission.gov.au/sites/default/files/2021-03/final-report-volume-1\\_0.pdf](https://agedcare.royalcommission.gov.au/sites/default/files/2021-03/final-report-volume-1_0.pdf)

<sup>4</sup> Shelter NSW in partnership with Regional Australia Institute. (February 2023, p. 14). *New South Wales Regional Housing Need Report*. Retrieved from [https://sheltersnsw.org.au/wp-content/uploads/2023/02/230223\\_Shelter-NSW-Regional-Housing-Need-Index\\_FINAL.pdf](https://sheltersnsw.org.au/wp-content/uploads/2023/02/230223_Shelter-NSW-Regional-Housing-Need-Index_FINAL.pdf)

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

<sup>7</sup> SGS Economics. (November 2022). *Rental Affordability Index: Key Findings*. Retrieved from [Publications – Rental affordability crisis requires urgent intervention shows new analysis \(sgsep.com.au\)](#) [interactive map]

<sup>8</sup> Pawson, H., Martin, C., Thompson, S., & Aminpour, F. (2021, p. 45). *COVID-19: Rental housing and homelessness policy impacts*. ACROSS/UNSW Poverty and Inequality Partnership Report No. 12. Retrieved from [https://sheltersnsw.org.au/wp-content/uploads/2021/11/Covid-19\\_rental-housing-and-homelessness-impacts-in-Australia-24-Nov.pdf](https://sheltersnsw.org.au/wp-content/uploads/2021/11/Covid-19_rental-housing-and-homelessness-impacts-in-Australia-24-Nov.pdf)

<sup>9</sup> Burke, K in Domain AU. (14 October 2022). *The NSW tree-change towns where rents have soared*. Retrieved from <https://www.domain.com.au/news/the-nsw-tree-change-towns-where-rents-have-soared-1174917/>; DCJ rent and sales quarterly reports (<https://www.facs.nsw.gov.au/resources/statistics/rent-and-sales/dashboard>)

<sup>10</sup> SQM Research. (n.d.). *Residential vacancy rates by postcode*. Retrieved from [https://sqmresearch.com.au/graph\\_vacancy.php](https://sqmresearch.com.au/graph_vacancy.php)

In addition to COVID-induced migration trends outlined above, there has been the domestic tourism boom. The lure of higher-profits per week in converting a dwelling to non-hosted accommodation through easy-to-use platforms such as Airbnb has gone basically unchecked:

**Table 1. Growth of whole-home Airbnbs in Coffs and surrounding locations**

LGA (2016 boundaries)	Number of whole-house accomm listed on Airbnb – Nov 2018 <sup>11</sup>	Number of whole-house accomm listed on Airbnb – Nov 2022 <sup>12</sup>
Coffs Harbour	583	779
Clarence Valley	371	749
Bellingen	153	223
Nambucca	149	217

The proportion of dwellings as social housing stock is approximately 4.3%, which is relatively high compared to other regional LGAs. However, there are nearly 900<sup>13</sup> applicants on the social housing waitlist associated with the Coffs Harbour and Woolgoolga DCJ allocation zones, waiting in excess of 10 years for most dwelling types<sup>14</sup>.

As anthropogenic global warming continues to be a major society-shaping factor into 2050 and beyond, homes and neighbourhoods need to be well-located and resilient to alternating flood and bushfire events<sup>15</sup>. Those most vulnerable to climate change impacts and homelessness are oftentimes low-income earners who are increasingly locked out of the private rental market and home ownership opportunities.

### 3. Social housing targets

To us at Shelter NSW, actions proposed under Initiative 1 are the most profound parts of the Draft Strategy. Shelter NSW acknowledges the work that has gone into the Draft Strategy of creating a target for an additional 2,215 Affordable Housing dwellings by 2041 (to meet additional need only). We do not dispute this figure; rather, **we offer support to an even higher target for social housing based purely on meeting the needs of a growing population.**

Regardless of rental vacancy rates or newly added housing stock, low-income renters always struggle to compete with higher income households. The private rental market is designed not to comfortably accommodate those who are less 'willing (able) to pay'<sup>16</sup> (Figure 1 over page):

<sup>11</sup> Cox, M. (2021). *Inside Airbnb*. Retrieved from <http://insideairbnb.com/get-the-data.html> [spreadsheet avail on request]

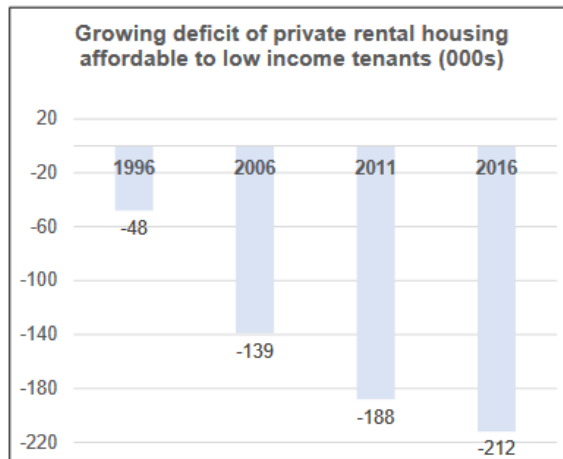
<sup>12</sup> Cox, M. (2022). *Inside Airbnb*. Retrieved from <http://insideairbnb.com/get-the-data.html> [spreadsheet avail on request]

<sup>13</sup> NSW DCJ. (June 2023). *Social applicant households on the NSW Housing Register by Allocation Zone*. Retrieved from <https://www.facs.nsw.gov.au/download?file=847773>

<sup>14</sup> NSW DCJ. (June 2022). *Expected waiting times*. Retrieved from <https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times>

<sup>15</sup> Intergovernmental Panel on Climate Change. (February 2022). *IPCC Sixth Assessment Report*. Retrieved from <https://www.ipcc.ch/report/ar6/wg2/>

<sup>16</sup> Nygaard, C., van den Nouweland, R., Glackin, S., Martin, C. and Sisson, A. (15 September 2022). *Filtering as a source of low-income housing in Australia: conceptualisation and testing*, Final Report No. 387 in AHURI. Retrieved from <https://www.ahuri.edu.au/research/final-reports/387>; Pawson, H. (4 July 2023). *Housing policy challenges for Australia: How does the Albanese Government's investment and reform package measure up?* [Powerpoint presentation]. UNSW City Futures Research

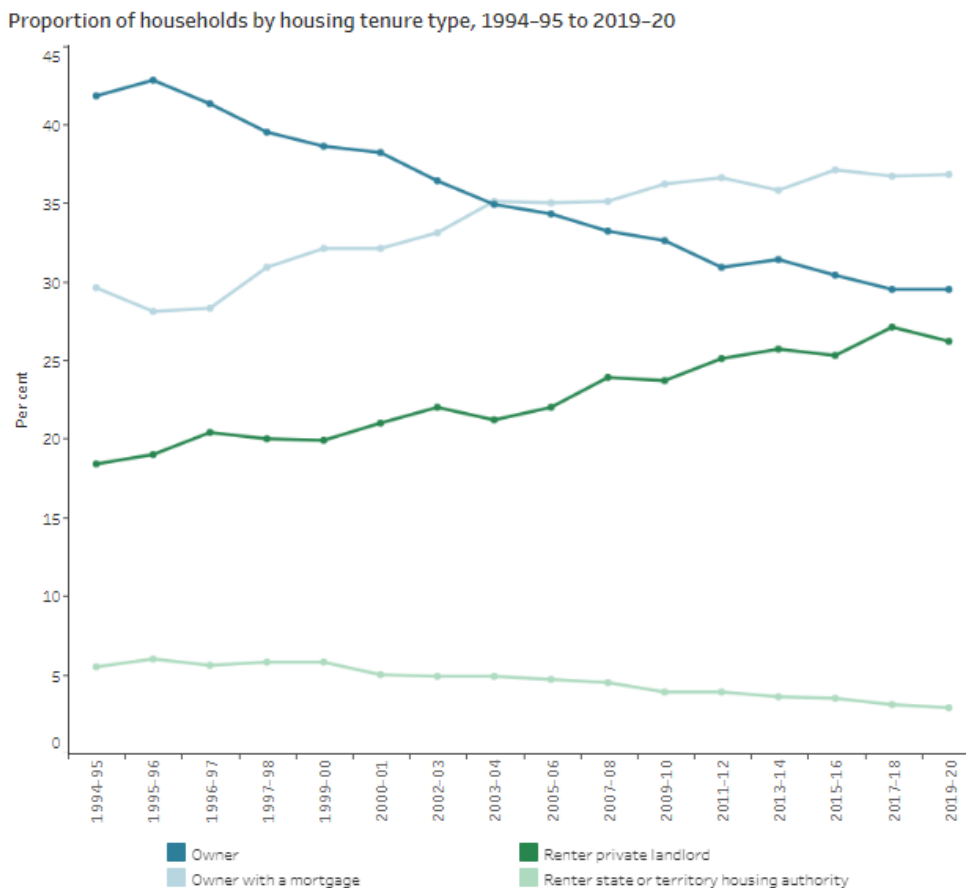


Source: Hulse et al. (2019) – original data from ABS Census



**Fig 1.** Extracted from [UNSW City Futures Research Centre presentation](#) by Hal Pawson.

Since the 1990s, the renting cohort in Australia has grown and dove-tailed with a decrease in home ownership:



**Fig 2.** Extracted from [Australian Institute of Health & Welfare](#).

Centre. Retrieved from [https://cityfutures.ad.unsw.edu.au/documents/720/ACTU\\_presentation\\_4\\_July\\_2023\\_v2.pdf](https://cityfutures.ad.unsw.edu.au/documents/720/ACTU_presentation_4_July_2023_v2.pdf)

Similarly, growth in social housing tenancies has taken a backseat and as such, many households of varying incomes and life stages are surviving/struggling in the 'wild west' of the private rental market.

These changes in tenure dynamics are no accident; it is through Commonwealth and State tax settings, concessions, investments, policies, and legislation that 'housing' has become a financial product or a wealth-creation vehicle (for a few landholders). 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.

The most efficient and direct way to alleviate housing stress for low-income households is through restoring social housing stock levels to 5% of all dwelling stock in each LGA, with 10% of all housing stock being social housing by 2040 in NSW. These are not fantastical or unrealistic percentages; in Australia up until a decade or so ago, 5% of housing as social housing was the norm<sup>17</sup>. Shelter NSW advocacy in the 5-10% range would put NSW *below the average* of other OECD jurisdictions<sup>18</sup>.

Numerical social housing targets should be outlined in the Draft Strategy and be commensurate with the growth in population forecast for the LGA<sup>19</sup>. Under this scenario and utilising data provided by DPE on population projections and implied dwelling demand, our 10% stock ask would materially result in just under 1% of all social housing properties in the State being delivered in the LGA by 2041 – refer **Appendix A**. To be clear, we are asking for an **additional 2,671 social housing properties to be delivered in the LGA by 2041**.

Advocacy bodies such as St Vincent De Paul Society, Homelessness NSW, CHIA NSW, and Sydney Alliance have consistently asked for 5,000 additional social housing properties be acquired/built in NSW for a decade to meet population projections alone. We reiterate this ask and note of that 50,000 figure, **approximately 450 additional social housing properties should be delivered in the LGA by 2033**.

Land represents a considerable cost that significantly impacts the viability of social and Affordable Housing developments. Opportunities exist across Government including LAHC, AHO, Transport Asset Holding Entity, Landcom, TAFE, School Infrastructure NSW, Local Health Districts, Crown Lands, local Councils and others to support delivery of the homes NSW needs. This land-use attitudinal shift of retaining existing holdings to realise public housing assets requires a reconsideration of the requirements of 'timely' financial returns and a greater focus on social return on investment. **Coffs Harbour City Council must partner with and apply pressure wherever possible to other government agencies to acquire and build public housing en masse on new and existing holdings.**

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<sup>17</sup> Pawson, H., Milligan, V., & Yates, J. (2020). *Housing Policy in Australia: A case for system reform*. (P. Macmillan, Ed.) Singapore: Springer Nature. doi:<https://doi.org/10.1007/978-981-15-0780-9>

<sup>18</sup> OECD Affordable Housing Database. (2022). *PH4.1 Social Rental Housing Stock*. Retrieved from <https://www.oecd.org/els/family/PH4-2-Social-rental-housing-stock.pdf>

<sup>19</sup> NSW Department of Planning & Environment. (2022). *GCC Six Cities 2022 CPA Population and Dwelling projections*. Retrieved from <https://www.planning.nsw.gov.au/Research-and-Demography/Population-Projections/Explore-the-data>



## Recommendations

1. Require social housing stock to be commensurate with population projections and representing 10% of all housing stock by 2041 in the LGA:
  - a. Advocate the following figures to State Government, particularly LAHC, and pin-down commitments to augmenting social housing stock in Coffs Harbour LGA:
    - i. By 2041, with just under 1% of the State's population residing in the LGA, at least 0.9% of the State's social housing dwellings shall also be located in the LGA
    - ii. By 2041, social housing dwellings in the LGA should be close to 4,200 in number (including 1,529 existing social housing properties; therefore 2,671 additional properties needed).
2. In line with the point above and sector-wide calls for an additional 5,000 social housing properties being acquired/built each year for a decade across NSW:
  - a. Advocate for 450 additional social housing properties being acquired/built in the LGA by 2033.
3. Ask for underpinning cost-benefit analyses, business cases, and tender documents to accompany rezoning and Development Applications for public housing renewal projects proposed by LAHC and other social housing providers, to ensure the maximum public benefit is being derived from "social mix" approaches to renewing public housing estates.
4. Pester LAHC to:
  - a. distinguish between "public" "community" "Aboriginal" "affordable rental" "affordable ownership" "below market" housing targets to ensure these are not combined into the same target group (ie clear distinctions and transparency is needed between publicly-owned and operated housing versus subsidised-to-market but otherwise private housing being delivered on historically publicly owned land)
  - b. commit to substantially higher targets for social and Affordable Housing on public housing renewal sites (ie preserve more than half of land for public housing/remaining in public ownership; deliver a substantial increase to the number of social dwellings on a site to make the disruption to tenants somewhat worthwhile; and deliver at least 15% Affordable Housing (rental or shared equity product) in addition to social housing and as an intermediary between social housing and market dwellings).
5. To ensure the maximum public benefit is being derived from developing publicly-owned land and that windfall land gains accrue to the public:
  - a. Ask for underpinning cost-benefit analyses, business cases, and tender documents to accompany rezoning and Development Applications for projects proposed by LAHC, TAHE, Landcom, TAFE, School Infrastructure NSW, Local Health Districts, Crown Lands, and other State agencies when they are proposing residential uses on publicly-owned land
  - b. Request at least 30% of residential development being social housing (public, community, or Aboriginal Housing)

- c. Request at least 15% Affordable Housing product (rental or low-income shared equity product)
  - d. Request at least 15% other government-owned housing (such as build-to-rent, key worker housing).
6. Advocate to State Government for Affordable Rental Housing in addition to social housing – not instead of it – when it comes to renewing public housing estates and developing on public land for residential purposes.
  7. Action 12a: Strengthen this position by requiring a *significant* net gain in social housing.

## 4. Aboriginal housing targets

Aboriginal people are strongly represented<sup>20</sup> in the LGA (5.8%) and as such there needs to be a strong commitment to delivering social and Affordable Housing specifically for Aboriginal households.

Shelter NSW took an interest last year in the Argyll Estate redevelopment plans (since shelved), advocating for better and more social housing wherever redevelopment must and should occur. This Estate is home to many First Nations households, and we noted at the time (in [our submission](#)) that exhibited plans would not have delivered a significant net gain to public housing stock, let alone Aboriginal housing. **Aboriginal housing sub-targets are needed in the Draft Strategy to ensure such a situation does not recur.**

An adequate supply of culturally-appropriate housing for Aboriginal households and families will not (and has not ever) been delivered by the private housing market. The private rental market routinely discriminates against First Nations applicants, and this is particularly the case when rental vacancy rates are at all-time lows as currently being experienced in regional NSW.

### Recommendations

8. Mandate at least 5% of Affordable Housing stock being dedicated Aboriginal housing delivered by Aboriginal Community Housing Providers, AHO, or other Aboriginal-controlled community organisations.

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<sup>20</sup> ABS Census. (2021). *Search by area*. Retrieved from <https://www.abs.gov.au/census/find-census-data/search-by-area>

## 5. Affordable Rental and Ownership targets

As we have stated earlier in this submission, we are pleased that the statutory definition in the NSW planning framework has made its way into the Draft Strategy (p. 1):

*What is affordable housing?*

*Housing is generally considered to be 'affordable' when households can meet their housing costs and still have sufficient income to pay for other basic needs such as food, clothing, transport, utilities, health care and education.*

*'Affordable housing' has a statutory definition under the Environmental Planning and Assessment Act 1979 (the Act), being housing for very low, low and moderate income households who pay no more than 30% of their gross household income on their rent or mortgage repayments.*

**Shelter NSW would also like this clear, legislated definition copied into the underpinning Draft Affordable Housing Policy.** Whilst we are aware that other definitions of “Affordable Housing” persist nationally (especially in relation to National Rental Affordability Scheme ‘NRAS’ properties), the inclusion of the premier definition of Affordable Housing in NSW in Coff’s Draft Policy is necessary to ensure that Affordable Rental Housing delivered as a result of enacting this Policy is genuinely affordable with regard to rent-setting. **We would urge the Glossary section of the Draft Policy and Draft Strategy to distinguish** between “Affordable Housing” as defined by the *Environmental Planning and Assessment Act 1979* and the *Housing SEPP 2021*, and “below-market rental housing” delivered by other legacy schemes such as NRAS or old Voluntary Planning Agreements.

With the NRAS ending and approximately 1,000 properties already expired and a further 5,600 properties to be taken out of circulation by 2026 when the Scheme ends<sup>21</sup>, in-perpetuity Affordable Rental Housing is needed more than ever to accommodate not just key workers but also those tenants who are no longer supported by NRAS accommodation.

We are broadly in support of the Actions identified under Initiative 9. However, in order for the Draft Strategy to make a consistent and permanent dent in the housing affordability crisis for the LGA, Affordable Housing must be required to be “affordable” in perpetuity (wherever jurisdictionally possible). Turning to Action 9a, **the waiver of certain development fees shall only apply to Affordable Housing being delivered in perpetuity, not some other “lesser fixed period”.** An additional advocacy action should be included in the Draft Strategy for **Council to lobby the NSW Department of Planning to amend the Housing SEPP 2021 to remove references to 10-15 year lapsing periods for Affordable Rental products.**

Land/housing dedicated to Council from private developers at no-cost for the purposes of Affordable Rental Housing (through an Affordable Housing Contributions Scheme) should always be set to affordable rents in-perpetuity. This applies especially in instances where Council retains ownership of Affordable Rental Housing but awards management of properties to Community Housing Providers (‘CHPs’) via peppercorn lease arrangements. **A commitment**

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<sup>21</sup> Australian Government - Department of Social Services. (June 2021). NRAS. Retrieved from [https://www.dss.gov.au/sites/default/files/documents/08\\_2021/nras-quarterly-report-30-jun-2021.pdf](https://www.dss.gov.au/sites/default/files/documents/08_2021/nras-quarterly-report-30-jun-2021.pdf)

**in the Draft Strategy to this principle of requiring any Affordable Housing delivered under an Affordable Housing Contributions Scheme to be affordable in-perpetuity is requested.** In a similar vein, the advocacy action 2a shall make explicit reference to advocating for development of Affordable Housing that is “affordable” in perpetuity on surplus/underutilised State government owned land.

We note that the Draft Strategy makes reference to needs-assessments of Affordable Home purchase products for very low, low, moderate income. The Draft Strategy rightly asserts that this category of Affordable Housing is much less of a priority delivery area compared to Affordable Rental and social housing products (p. 6 and 7).

Monitoring of Affordable Housing targets (especially Affordable Rental dwellings) is notoriously lacking in NSW. The NSW Department of Planning does not presently track Affordable Housing numbers, types, locations, lapsing periods of Affordable Rental Housing developed as a result of the *Housing SEPP 2021* (or former *SEPP 70* and former *Affordable Rental Housing SEPP 2009*). **We therefore urge Coffs Harbour to create a system of accurately tracking Affordable Housing delivered via the Draft Strategy and any future Affordable Housing Contributions Schemes.** Alternatively, Council could lobby the North Coast Urban Housing Monitoring Program<sup>22</sup> or Department of Planning to take up this responsibility to create a well-resourced North Coast region tracker of Affordable Housing.

## Recommendations

9. Copy the legislated definition of “Affordable Housing” (from *EP&A Act 1979* and *Housing SEPP 2021*) into the Draft Affordable Housing Policy.
10. Alter the Glossary section of the Draft Policy and Draft Strategy to distinguish between “Affordable Housing” as defined in the Act and the Housing SEPP, and “below-market rental housing” delivered by other legacy schemes such as NRAS or old Voluntary Planning Agreements.
11. Action 9a: the waiver of certain development fees shall *only* apply to Affordable Housing being delivered in perpetuity, not to development of Affordable Housing for some other “lesser fixed period”.
12. Include additional advocacy action for Council to lobby the NSW Department of Planning to amend the *Housing SEPP 2021* to remove references to 10-15 year lapsing periods for Affordable Rental products.
13. Commit to the principle of requiring any Affordable Housing delivered under an Affordable Housing Contributions Scheme to be affordable in-perpetuity.
14. Action 2a: Make explicit reference to advocating for development of Affordable Housing that is “affordable” in perpetuity on surplus/underutilised State government owned land.
15. In order to adequately track *any* affordable rental housing targets, maintain and publish data on Affordable Rental Housing granted approval and created under the provisions of the *Housing SEPP 2021* (and former SEPP versions such as *ARHSEPP 2009* and *SEPP 70*)

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<sup>22</sup> As referenced in: NSW Government. (December 2022). *North Coast Regional Plan 2041*. Retrieved from <https://www.planning.nsw.gov.au/sites/default/files/2023-03/north-coast-regional-plan-2041.pdf>

- a. This database/register shall track information on approval status, development status, timeframe status (ie housing being “affordable” in perpetuity from x date, or time-limited), and locations (suburbs) of Affordable Housing made possible by the Housing SEPP. This includes housing built in accordance with Affordable Housing Contributions Schemes as well as Affordable Rental Housing reliant on provisions from Chapter 2 of the Housing SEPP
- b. In time, this register should be expanded to include data on affordable housing made possible by Voluntary Planning Agreements
- c. Request North Coast Urban Housing Monitoring Program or Department of Planning to take custodianship of any such database and/or secure sustainable funding from Department of Planning to manage the database locally.

## 6. Affordable Housing Contribution Schemes and Voluntary Planning Agreements

Affordable Housing Contributions Schemes (‘AHCSs’) and Voluntary Planning Agreements (‘VPAs’) offer two different avenues to capture land value uplift that accompanies changes to planning rules (or significant development proposals), for the purposes of securing Affordable Housing (usually in perpetuity) on the same land or elsewhere in an LGA.

Shelter NSW recognises a lot of groundwork in JSA’s Background Paper and Options Paper has set the scene for implementing Affordable Housing Contributions Schemes across the LGA.

Without Affordable Housing Contributions Scheme(s) in place, current opportunities are being missed for big and small rezonings alike. Cumulatively, with the sheer volume of “small pocket” rezonings happening from lower order (Rural, Environmental) zones to higher order (Employment, Mixed Use, Residential) zones across the LGA, many Planning Proposals could easily be captured by a modest, broad-base Affordable Housing Contribution rate for housing to be delivered on-site or elsewhere in the LGA, through AHCSs. Many smaller rezonings to employment lands tend to (in aggregate) generate additional demand for Affordable Housing for trade apprentices, bulky goods retail workers, logistics and warehouse workers, and other keys workers. Coffs Harbour City Council should advance inclusionary zoning principles that are cognisant of this fact.

**Yet, we observe that the actions (15a, 15b) following Initiative 15 are not ambitious enough.** Greenfield (rural to residential rezoning) Affordable Housing contribution rates have been accepted for Byron Shire Council and Penrith City Council by the Department of Planning in recent times. The preliminary economic viability testing by Judith Stubbs & Associates for the Coffs Harbour LGA demonstrates that significant land value uplift occurs in these scenarios of rural to residential rezoning, and that a 15% contribution rate “would not be unreasonable”. It follows, then, that Action 15b should be more forceful in its ‘next steps’ for **implementing this contribution rate across the LGA for greenfield rezonings.**

**The timeframe should be immediate for Action 15b**, rather than “as and when required”. Putting in place a scheme signalling that a portion of land value uplift will be captured by an Affordable Housing requirement is best practice<sup>23</sup> for:

- a) ensuring that the monetary/land dedication to Affordable Housing is funded by a developer paying **less for the land** at the outset, and
- b) reducing speculative investment in important farmland or industrial land for the purposes of conversion to mixed use or residential land.

Likewise, **a more urgent and purposeful timeframe should be adopted for action 15a** in introducing a low-rate broad-based (or at the very least, moderate-rate “renewal area focussed”) AHCS to capture value uplift arising from changes to planning to controls (floor space ratios, land zoning, height of building controls etc).

VPAs are sometimes used in lieu of formal Affordable Housing Contributions Schemes or Infrastructure Contributions Plans. They can also garner de facto inclusionary zoning outcomes until such time that AHCSs are formalised. Further, **VPAs can serve as an Affordable Housing stop-gap measure in instances of temporary workforce surges** associated with large scale infrastructure projects and the like that may not otherwise need to conduct Social Impact Assessments.

The Draft Strategy acknowledges that the City is lacking in its VPA policy. We suggest Council include strong provisions in any Planning Agreements Policy to set the nexus between delivery of Affordable Rental Housing and development/rezoning activities that would otherwise be captured by a future AHCS.

## Recommendations

16. Expand scope for AHCS(s) to not just rezonings which deliver “housing uplift” but any rezoning activities which generate commercial/industrial investment (or changes to planning rules for floor area and height of building controls in E-, B-, IN- zones) and induce local/regional demand for housing by new or augmented workforces.
17. Action 15b: Be more forceful in ‘next steps’ for implementing the 15% contribution rate across the LGA for greenfield rezonings
  - a. The timeframe should be immediate for implementing Action 15b, rather than “as and when required”.
18. Action 15a: More urgent and purposeful timeframe shall be adopted in introducing a low-rate broad-based (or at the very least, moderate-rate “renewal area focussed”) AHCS to capture value uplift arising from changes to planning to controls (floor space ratios, land zoning, height of building controls etc).
19. Strengthen possible linkages between VPAs and major projects under Action 7a and 7b of the Draft Strategy.

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<sup>23</sup> SGS Economics & Planning. (March 2018). *Development Contributions for Affordable Housing: Theory and implementation*. Retrieved from <https://sgsep.com.au/assets/main/SGS-Economics-and-Planning-Development-contributions-for-affordable-housing.pdf>

20. Include strong provisions in Council's Voluntary Planning Agreements Policy to set the nexus between:
- a) the delivery of Affordable Rental Housing through Planning Agreements, and
  - b) developments and rezoning activities that would otherwise be captured by a future AHCS.

## 7. Crisis accommodation

In NSW, 50% of the 47,700 or more people seeking accommodation assistance from the Specialist Homelessness Sector were turned away during the reporting period of 2021-22<sup>24</sup>. In another review, the NSW Auditor-General also found<sup>25</sup> that the reach of Specialist Homelessness Services ('SHSs') into regional areas was limited, with just 34 of 128 local government areas receiving direct support.

We support Action 1a in its call for additional State funding for crisis accommodation. Further, Shelter NSW supports JSA's Option Paper "meanwhile" or "meantime" use strategies and lament that they are not explicitly included in the Draft Strategy. **An audit of suitable land and dwellings for temporary use as crisis accommodation is sorely needed in the short-term.**

### Recommendations

21. Include actions in the Draft Strategy to capitalise on "meanwhile" or "meantime" use, as referred to in JSA's Options Paper
- a. Conduct an audit of suitable land and dwellings for temporary use as crisis accommodation (timeframe for implementation: immediate).

## 8. Pilot projects

The Draft Strategy asserts that (p. 7):

*Strategies that focus on advocacy and facilitating delivery through planning controls are considered to be the most efficient and cost-effective way for the City to influence funding and delivery of affordable housing.*

Advocacy initiatives have their place in any such Strategy which aims to deliver more social and Affordable Housing, however, centring 'advocacy' activities as the preferred vehicle for achieving this vision is not recommended.

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<sup>24</sup> Productivity Commission (Cth). (20 January 2023). *Report on Government Services, Part G Housing and Homelessness*. Retrieved from <https://www.pc.gov.au/ongoing/report-on-government-services/2023/housing-and-homelessness>

<sup>25</sup> NSW Office of the Auditor-General (4 June 2021, p. 15). *Performance Audit: Responses to homelessness*. Retrieved from <https://www.audit.nsw.gov.au/our-work/reports/responses-to-homelessness>

A suite of practical delivery options is outlined in the Options Paper by JSA – right down to site-specific investigations of government owned land. **Shelter NSW recommends enhancing the ambition and urgency of the Draft Strategy by including initiatives that relate directly to pilot projects for social and Affordable Housing on sites identified as suitable for development in Appendix A of the Options Paper.**

For example, a site on the corner of Hogbin Drive and City Hill Drive is owned by Council and already part zoned R3 medium density residential (approximately 5ha) and has been recommended by JSA in the Options Paper for “residential flat buildings” “boarding houses” “seniors housing” with dedicated portion of Affordable Housing:

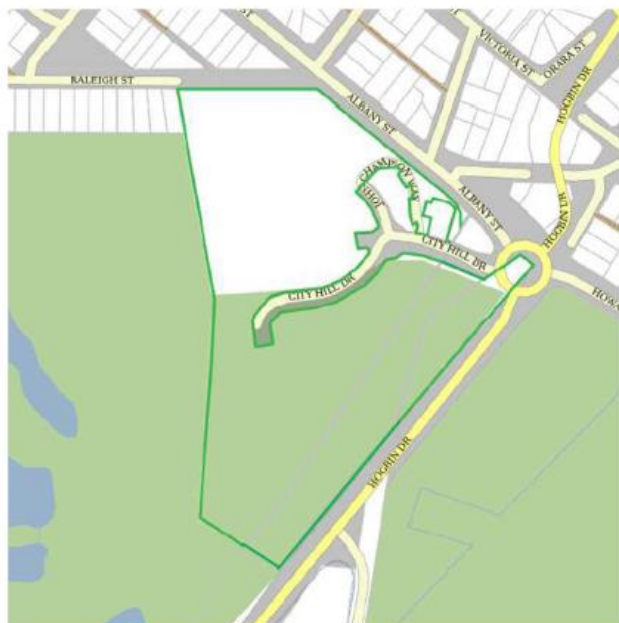


Figure 1: Lot 100 DP 862869, Lot 1 DP 880432 and Lot 24 DP 1031761  
Source: EAC RedSquare Mapping

**Fig 3.** Extract of recommended site in JSA Options Paper (p. 72).

The next step for many of these identified sites in the Options Paper would seemingly be to include them as pilot project sites in the Draft Strategy for delivery of social and Affordable Housing in partnership with Landcom, LAHC, AHO, Aboriginal CHPs, or CHPs generally.

**Pilot projects identified in the Draft Strategy can and should demonstrate “sustainable design and best practice development for quality housing options”,** being a stated goal in the Draft Affordable Housing Policy (p. 1) and existing *MyCoffs Community Strategic Plan 2032*.

Specific references to sustainable, low-energy designed dwellings are not made in the Draft Strategy. People on low incomes are more likely to be renters (40%), as are First Nations adults (68%)<sup>26</sup>. People with disability have lower heat tolerances and mental health disorders/medication can negatively impact the ability to self-regulate body temperature<sup>27</sup>.

<sup>26</sup> Australian Government – Australian Institute of Health and Welfare. (16 September 2021). *Indigenous Housing*. Retrieved from <https://www.aihw.gov.au/reports/australias-welfare/indigenous-housing>

<sup>27</sup> American Psychiatric Association. (30 June 2021). *Extreme heat contributes to worsening mental health, especially among vulnerable populations*. Retrieved from <https://www.psychiatry.org/news-room/news-releases/extreme-heat-contributes-to-worsening-mental-health>



Low-income and marginalised households are more likely to live in the most inefficient houses and spend a greater proportion of their income on utility bills compared to owner occupiers<sup>28</sup>.

**It is imperative that the Draft Strategy recognises the need for social housing, Affordable Housing, and below-market rentals to be superior in their built-form and accessibility standards** to reduce long-term costs and climate shocks, as well as improve health outcomes of vulnerable households.

The Draft Strategy is silent on the need for social and Affordable Housing to meet the needs of people with disability. **Any social, Affordable, or below-market rent dwellings facilitated or delivered by the Strategy should be required to meet the National Construction Code's Liveable Housing accessibility standards (silver or gold)**<sup>29</sup>.

## Recommendations

22. In line with Initiative 13, enhance the ambition and urgency of the Draft Strategy by including initiatives that relate directly to pilot projects for social and Affordable Housing on sites identified as suitable for development in Appendix A of JSA's Options Paper.
  - a. The next step for many of these identified sites in the Options Paper would seemingly be to include them as pilot project sites in the Draft Strategy for delivery of social and Affordable Housing in partnership with Landcom, LAHC, AHO, Aboriginal CHPs, or CHPs generally.
  - b. Pilot projects identified in the Draft Strategy can and should demonstrate "sustainable design and best practice development for quality housing options".
23. Recognise the need for social housing, Affordable Housing, and below-market rentals to be superior in their built-form and accessibility standards in the Affordable Housing Strategy.
24. Mandate that any social, Affordable, or below-market rent dwellings facilitated or delivered by the Strategy should be required to meet the National Construction Code's Liveable Housing accessibility standards (silver or gold)<sup>30</sup>.

## 9. Whole-home holiday accommodation

Shelter NSW has made considerable representations to the Department of Planning on the phenomena of housing stock conversions to the whole-home holiday accommodation market, principally through [our submission](#) to the Independent Planning Commission ('IPC') on the Byron Shire "Short Term Rental Accommodation" Planning Proposal.

"Home sharing" platforms such as Airbnb have moved a long way from being incidental income makers for owner-occupiers in their primary place of residence. They now operate as quasi-

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<sup>28</sup> Razaghi, T. in *Sydney Morning Herald*. (26 May 2022). *Renters sluggish with \$150 extra in home energy bill costs per year*. Retrieved from <https://www.smh.com.au/property/news/renters-sluggish-with-150-extra-in-home-energy-bill-costs-per-year-20220518-p5amgs.html>

<sup>29</sup> National Construction Code. (2022). *New liveable housing design requirements*. Retrieved from <https://ncc.abcb.gov.au/news/2022/new-liveable-housing-design-requirements>

<sup>30</sup> National Construction Code. (2022). *New liveable housing design requirements*. Retrieved from <https://ncc.abcb.gov.au/news/2022/new-liveable-housing-design-requirements>

hotels for property investors, being commercial in nature, and with an eroding effect on the total stock of housing able to be used as homes by local residents and renters<sup>31</sup>. Please note that wherever possible, Shelter NSW generally does not use the phrase “short term rental accommodation” or “STRA” to describe this commercialisation of housing; dignifying this use as a form of “rental accommodation” is antithetical to our mission in supporting actual renters achieve security of tenure.

As outlined in the **Context** section of this submission (**Table 1**), whole-home holiday accommodation growth in the LGA has been significant since 2018. We also point to night-occupancy data to highlight that the State Government’s default day-cap solution of Councils opting into 180-days exempt per year is inadequate:

**Table 2. Night occupancy data for existing whole-home accommodation on Airbnb<sup>32</sup>**

LGA (2016 boundaries)	Whole-home listings that are booked for less than 90 days per 12 month period (to Nov 2022)	Whole-home listings that are booked for more than 90 days per 12 month period (to Nov 2022)	Whole-home listings that are booked more than 180 days per 12 month period (to Nov 2022)	Average night occupancy/nights booked in 12-month period to Nov 2022 (all listing types)
Coffs Harbour	520	259	137	92
Clarence Valley	592	157	52	50
Bellingen	130	93	47	111
Nambucca	140	77	42	99

Table 2 demonstrates how 180 days is such a high cap that it would regulate only a small portion (less than 20%) of whole-home Airbnbs in the Coffs LGA. The Department of Planning & Environment, in their own representations to the Byron Shire IPC Public Hearing on Day 1 admitted that the 180-day State-default cap was “arbitrary... no real science behind it”<sup>33</sup>. This admission tracks with the lack of international case studies one can find in relation to government bodies instituting a 180-day whole-home, unhosted accommodation cap – let alone where such a cap has been effective at incentivising the return of homes to the long-term rental or owner-occupier market.

For a day-cap mechanism to have any hope in effectively enticing homes back to the regular housing market, the cap needs to substantially capture some of those properties that would otherwise be booked out above the day-cap. As indicated above, 180-days per year exempt cap on non-hosted accommodation is nearly unheard of in international and national policy frameworks. The “norm” for unhosted, non owner-occupied accommodation caps tends to sit around 30 to 90 days per year<sup>34</sup>.

<sup>31</sup> Sigler, T. & Panczak, R. in The Conversation AU. (13 February 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>

<sup>32</sup> Cox, M. (2021). *Inside Airbnb*. Retrieved from <http://insideairbnb.com/get-the-data.html> [spreadsheet avail on request]

<sup>33</sup> Walton, L. on behalf of DPE. (21 February 2023, p. 9). *Public Hearing Day 1: Transcript of Proceedings*. NSW IPC Case: Byron Shire Short Term Rental Accommodation Planning Proposal. Retrieved from <https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/transcripts-and-material/2022/byron-bay-stra/230221-byron-shire-stra-pp-public-hearing-transcript-day-1.pdf>

<sup>34</sup> Hubscher, M, & Kallert, T. (8 September 2022). Taming Airbnb Locally: Analysing regulations in Amsterdam, Berlin, and London. *Journal of Economic and Human Geography*. Retrieved from <https://onlinelibrary.wiley.com/doi/10.1111/tesg.12537>

Whilst we are hopeful that the conversation around lower day-caps is maturing in this State (with the announcement recently of Byron Shire able to regulate down to 60-days per calendar year exempt non-hosted accommodation<sup>35</sup>), each Council needs to advocate strongly to the Department of Planning for the best possible outcome for its low-income residents. We also note that the Department of Planning is preparing to undertake a review of the *Housing SEPP 2021* provisions on “STRA” (beginning in November 2023). **Shelter NSW strongly implores Coffs Harbour Council to engage directly in this process with the Department of Planning and Minister for Planning, Paul Scully.**

Generally, Shelter NSW has come to the conclusion that the State Government needs to be flexible in working with and allowing Councils to set their own short-term holiday accommodation regulations and policies. **We assert that in many instances, a permit- and DA-based rather than day-cap system is more appropriate in directly enforcing and monitoring the return of homes to the traditional housing market.**

Research internationally<sup>36</sup> has shown that annual day-caps for non-hosted holiday accommodation use are less efficient in returning dwellings to the long-term rental market than policies limiting the total number of whole-home accommodation per suburb. We suggest that the total number of non owner-occupied hosted accommodation should be capped per LGA in accordance with local studies into the maximum allowable number of non-hosted accommodation that can occur without adverse impact on the long-term rental market in each location.

Furthermore, **total non-hosted accommodation volume caps for LGAs should be guided by density caps (e.g. no more than x number of non-hosted accommodation options per y suburb)**, to ensure hollowing out of well-serviced, well-located neighbourhoods for whole-home accommodation use does not occur. **Local research and evidence for density caps and as they vary from suburb to suburb will be required.**

The sociospatial disadvantages of whole-home holiday accommodation use are well documented globally<sup>37</sup>, in that local residents are generally pushed further afield from their areas of employment and community facilities, with significant burdens on planning for transport, open space, schools, and other physical and social infrastructure. Density caps that are tipped more favourably to non-hosted accommodation uses in certain neighbourhoods will allow better infrastructure planning, more creative precinct planning, and more holistic leisure experiences in line with tourism goals of cities and regions.

Ultimately, however, we note that at the same time that the *Draft Affordable Housing Strategy* is on exhibition, Council’s *Draft Tourism Strategy* is also on exhibition. We see no mention in either

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<sup>35</sup> Rushforth, C, Tanner, B., & Riley, P. in ABC North Coast. (26 September 2023). *Byron Bay landlords will be forced to cap some short-term rentals at 60 days in attempt to ease housing crisis*. Retrieved from <https://www.abc.net.au/news/2023-09-26/byron-bay-short-term-holiday-cap-approved/102900176>

<sup>36</sup> (Such as London versus Barcelona). Frenken, K & Schor, J. (2019). Putting the sharing economy into perspective. In *A research agenda for sustainable consumption governance*. Edward Elgar Publishing ; Temperton, J. (February 13, 2020). *Airbnb has devoured London - and here's the data that proves it*. <https://www.wired.co.uk/article/airbnb-london-short-term-rentals>

<sup>37</sup> (example: formerly working class district of Alfama in Lisbon, now thoroughly gentrified) Shabrina, Z et al (2021). Airbnb and its potential impact on the London housing market. <https://doi.org/10.1177/0042098020970865> ; Coccola-Gant, A & Gago, A. (2019). Airbnb, buy-to-let investment and tourism-driven displacement: A case study in Lisbon. <https://doi.org/10.1177/0308518X19869012>

strategy about the role/impact of “short term rental accommodation” in the LGA. **There is potentially a wasted opportunity here to align these two strategies and ensure that Coff’s tourism goals go hand in glove with ensuring that enough dwelling stock is retained in the long-term residential rental market** (ie homes are not lost to whole-home holiday market conversions at an unsustainable rate).

Shelter NSW has highlighted to the Department of Planning<sup>38</sup> the folly in setting housing supply targets if the Department is not also monitoring the attrition rate of housing stock to the short term holiday market. Goals to increase housing supply may be scuppered by new and existing housing stock being diverted at fluctuating rates to the non-hosted holiday accommodation market. We are not aware of specific monitoring of this issue by the Department of Planning or North Coast Urban Housing Monitoring Program. **We would like to see real monitoring of the dwelling stock conversion rate to non-hosted holiday accommodation built into the North Coast Urban Housing Monitoring Program’s remit.**

## Recommendations

25. Engage immediately with the Planning Minister and Department of Planning on the Department’s review into “STRA” provisions of the *Housing SEPP 2021* (due to commence November 2023).
26. Create Actions under the “Facilitate” section of the Draft Strategy to:
  - a. Conduct local research into and develop evidence-base for unhosted, non owner-occupier holiday accommodation density caps versus day-caps.
  - b. Utilise IPC advice that:
    - i. Non-hosted whole-home holiday accommodation is a change of use from a dwelling house, particularly in circumstances where the use occurs (or is proposed/likely to occur) for more than 60 days per calendar year
    - ii. Require change of use DA consent from “dwelling house” to “tourist and visitor accommodation” (“serviced apartment”) in circumstances where non-hosted whole-home holiday accommodation is or is likely to exceed the locally accepted cap (90, 60, 30 days).
  - c. In the interim and at a minimum, opt-into the *Housing SEPP* to regulate non hosted “STRA” and monitor housing stock loss to “STRA” through North Coast Urban Housing Monitoring Program (or local Council resources).
27. Align the Draft Strategy with the Draft Tourism Strategy, to ensure that Coff’s tourism goals go hand in glove with ensuring that enough dwelling stock is retained in the long-term residential rental market.

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<sup>38</sup> Shelter NSW. (27 October 2022). *Greater Cities Commission Six Cities Discussion Paper: Submission*. Retrieved from [https://sheltersnsw.org.au/wp-content/uploads/2022/10/221027\\_GCCSixCitiesDiscussionPaper\\_submission\\_final\\_KC.pdf](https://sheltersnsw.org.au/wp-content/uploads/2022/10/221027_GCCSixCitiesDiscussionPaper_submission_final_KC.pdf)

## 10. Summary of recommendations

The recommendations peppered throughout this submission are collated below for Council's consideration:

1. Require social housing stock to be commensurate with population projections and representing 10% of all housing stock by 2041 in the LGA:
  - a. Advocate the following figures to State Government, particularly LAHC, and pin-down commitments to augmenting social housing stock in Coffs Harbour LGA:
    - i. By 2041, with just under 1% of the State's population residing in the LGA, at least 0.9% of the State's social housing dwellings shall also be located in the LGA.
    - ii. By 2041, social housing dwellings in the LGA should be close to 4,200 in number (including 1,529 existing social housing properties; therefore 2,671 additional properties needed).
2. In line with the point above and sector-wide calls for an additional 5,000 social housing properties being acquired/built each year for a decade across NSW:
  - a. Advocate for 450 additional social housing properties being acquired/built in the LGA by 2033.
3. Ask for underpinning cost-benefit analyses, business cases, and tender documents to accompany rezoning and Development Applications for public housing renewal projects proposed by LAHC and other social housing providers, to ensure the maximum public benefit is being derived from "social mix" approaches to renewing public housing estates.
4. Pester LAHC to:
  - a. distinguish between "public" "community" "Aboriginal" "affordable rental" "affordable ownership" "below market" housing targets to ensure these are not combined into the same target group (ie clear distinctions and transparency is needed between publicly-owned and operated housing versus subsidised-to-market but otherwise private housing being delivered on historically publicly owned land).
  - b. commit to substantially higher targets for social and Affordable Housing on public housing renewal sites (ie preserve more than half of land for public housing/remaining in public ownership; deliver a substantial increase to the number of social dwellings on a site to make the disruption to tenants somewhat worthwhile; and deliver at least 15% Affordable Housing (rental or shared equity product) in addition to social housing and as an intermediary between social housing and market dwellings).
5. To ensure the maximum public benefit is being derived from developing publicly-owned land and that windfall land gains accrue to the public:
  - a. Ask for underpinning cost-benefit analyses, business cases, and tender documents to accompany rezoning and Development Applications for projects proposed by

LAHC, TAHE, Landcom, TAFE, School Infrastructure NSW, Local Health Districts, Crown Lands, and other State agencies when they are proposing residential uses on publicly-owned land.

- b. Request at least 30% of residential development being social housing (public, community, or Aboriginal Housing).
  - c. Request at least 15% Affordable Housing product (rental or low-income shared equity product).
  - d. Request at least 15% other government-owned housing (such as build-to-rent, key worker housing).
6. Advocate to State Government for Affordable Rental Housing in addition to social housing – not instead of it – when it comes to renewing public housing estates and developing on public land for residential purposes.
  7. Action 12a: Strengthen this position by requiring a *significant* net gain in social housing.
  8. Mandate at least 5% of Affordable Housing stock being dedicated Aboriginal housing delivered by Aboriginal Community Housing Providers, AHO, or other Aboriginal-controlled community organisations.
  9. Copy the legislated definition of “Affordable Housing” (from *EP&A Act 1979* and *Housing SEPP 2021*) into the Draft Affordable Housing Policy.
  10. Alter the Glossary section of the Draft Policy and Draft Strategy to distinguish between “Affordable Housing” as defined in the Act and the Housing SEPP, and “below-market rental housing” delivered by other legacy schemes such as NRAS or old Voluntary Planning Agreements.
  11. Action 9a: the waiver of certain development fees shall *only* apply to Affordable Housing being delivered in perpetuity, not to development of Affordable Housing for some other “lesser fixed period”.
  12. Include additional advocacy action for Council to lobby the NSW Department of Planning to amend the *Housing SEPP 2021* to remove references to 10-15 year lapsing periods for Affordable Rental products.
  13. Commit to the principle of requiring any Affordable Housing delivered under an Affordable Housing Contributions Scheme to be affordable in-perpetuity.
  14. Action 2a: Make explicit reference to advocating for development of Affordable Housing that is “affordable” in perpetuity on surplus/underutilised State government owned land.
  15. In order to adequately track *any* affordable rental housing targets, maintain and publish data on Affordable Rental Housing granted approval and created under the provisions of the *Housing SEPP 2021* (and former SEPP versions such as *ARHSEPP 2009* and *SEPP 70*).
    - a. This database/register shall track information on approval status, development status, timeframe status (ie housing being “affordable” in perpetuity from x date, or time-limited), and locations (suburbs) of Affordable Housing made possible by the

Housing SEPP. This includes housing built in accordance with Affordable Housing Contributions Schemes as well as Affordable Rental Housing reliant on provisions from Chapter 2 of the Housing SEPP.

- b. In time, this register should be expanded to include data on affordable housing made possible by Voluntary Planning Agreements.
  - c. Request North Coast Urban Housing Monitoring Program or Department of Planning to take custodianship of any such database and/or secure sustainable funding from Department of Planning to manage the database locally.
16. Expand scope for AHCS(s) to not just rezonings which deliver “housing uplift” but any rezoning activities which generate commercial/industrial investment (or changes to planning rules for floor area and height of building controls in E-, B-, IN- zones) and induce local/regional demand for housing by new or augmented workforces.
17. Action 15b: Be more forceful in ‘next steps’ for implementing the 15% contribution rate across the LGA for greenfield rezonings.
  - a. The timeframe should be immediate for implementing Action 15b, rather than “as and when required”.
18. Action 15a: More urgent and purposeful timeframe shall be adopted in introducing a low-rate broad-based (or at the very least, moderate-rate “renewal area focussed”) AHCS to capture value uplift arising from changes to planning to controls (floor space ratios, land zoning, height of building controls etc).
19. Strengthen possible linkages between VPAs and major projects under Action 7a and 7b of the Draft Strategy.
20. Include strong provisions in Council’s Voluntary Planning Agreements Policy to set the nexus between:
  - c) the delivery of Affordable Rental Housing through Planning Agreements, and
  - d) developments and rezoning activities that would otherwise be captured by a future AHCS.
21. Include actions in the Draft Strategy to capitalise on “meanwhile” or “meantime” use, as referred to in JSA’s Options Paper.
  - a. Conduct an audit of suitable land and dwellings for temporary use as crisis accommodation (timeframe for implementation: immediate).
22. In line with Initiative 13, enhance the ambition and urgency of the Draft Strategy by including initiatives that relate directly to pilot projects for social and Affordable Housing on sites identified as suitable for development in Appendix A of JSA’s Options Paper.
  - a. The next step for many of these identified sites in the Options Paper would seemingly be to include them as pilot project sites in the Draft Strategy for delivery of social and Affordable Housing in partnership with Landcom, LAHC, AHO, Aboriginal CHPs, or CHPs generally.

- b. Pilot projects identified in the Draft Strategy can and should demonstrate “sustainable design and best practice development for quality housing options”.
- 23. Recognise the need for social housing, Affordable Housing, and below-market rentals to be superior in their built-form and accessibility standards in the Affordable Housing Strategy.
- 24. Mandate that any social, Affordable, or below-market rent dwellings facilitated or delivered by the Strategy should be required to meet the National Construction Code’s Liveable Housing accessibility standards (silver or gold).
- 25. Engage immediately with the Planning Minister and Department of Planning on the Department’s review into “STRA” provisions of the *Housing SEPP 2021* (due to commence November 2023).
- 26. Create Actions under the “Facilitate” section of the Draft Strategy to:
  - a. Conduct local research into and develop evidence-base for unhosted, non owner-occupier holiday accommodation density caps versus day-caps.
  - b. Utilise IPC advice that:
    - i. Non-hosted whole-home holiday accommodation is a change of use from a dwelling house, particularly in circumstances where the use occurs (or is proposed/likely to occur) for more than 60 days per calendar year.
    - ii. Require change of use DA consent from “dwelling house” to “tourist and visitor accommodation” (“serviced apartment”) in circumstances where non-hosted whole-home holiday accommodation is or is likely to exceed the locally accepted cap (90, 60, 30 days).
  - c. In the interim and at a minimum, opt-into the *Housing SEPP* to regulate non hosted “STRA” and monitor housing stock loss to “STRA” through North Coast Urban Housing Monitoring Program (or local Council resources).
- 27. Align the Draft Strategy with the Draft Tourism Strategy, to ensure that Coff’s tourism goals go hand in glove with ensuring that enough dwelling stock is retained in the long-term residential rental market.



## Appendix A

<b>*DPE data (<a href="https://www.planning.nsw.gov.au/Research-and-Demography/Population-Projections/Explore-the-data">https://www.planning.nsw.gov.au/Research-and-Demography/Population-Projections/Explore-the-data</a>)</b>				<b>*Shelter asks</b>	
<b>Year</b>	<b>Location</b>	<b>Population</b>	<b>Implied dwelling demand (no. of total dwellings required to house projected population, all tenure types)</b>	<b>Restoring 5% of all housing stock as social housing</b>	<b>10% of all housing stock as social housing</b>
2022	Coffs Harbour LGA	78,203	35,548	1,777 (including approx. 1,529 existing social housing properties)	3,555 (inc. 1,529 existing)
2041		89,040	41,983	2,099 (inc. 1,529 existing)	4,198 (inc. 1,529 existing)
2022	NSW Total	8,172,657	3,444,382	172,219	344,438
2041		9,872,934	4,329,475	216,474	432,948
<b>Total % of population in NSW that will reside in the LGA by 2041</b>				<b>0.90</b>	
<b>Total % of NSW social housing dwellings that will be delivered in the LGA per Shelter's 10% of all housing stock ask by 2040</b>				<b>0.97</b>	

**Table DWELLINGS.5: Dwellings, by local government area for public housing, SOMIH and community housing, 2022**

<b>State/territory</b>	<b>Region Code</b>	<b>Region Name</b>	<b>Total housing</b>
NSW	11800	Coffs Harbour (C)	1,529

*Notes*

1. Data correspond to LGA 2019 boundaries.
2. Dwellings were assigned to LGAs using a postcode to SA2 correspondence file and a SA2 to LGA correspondence file. This may lead to some minor inaccuracies in results.
3. May not sum to totals presented in other tables due to rounding.

*Source:* AIHW National Housing Assistance Data Repository.