



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

Introduction – and the context for Shelter NSW

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

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

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

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

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

¹ See Shelter NSW 2019 Election Platform

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

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

We are pleased to provide comment on Cumberland Council's draft Local Strategic Planning Statement (LSPS) 'Cumberland 2030'.

The broader context

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

This is all occurring amidst a growing and changing population dynamic that is applying new pressures to our existing urban communities. Sydney is no longer just growing outwards, pushing its rural/urban fringe further from the city's main centres. It is consolidating and developing new urban centres closer to the fringe, and large tracts of already developed land that are well within the city's inner and middle suburban rings are earmarked for or undergoing renewal at increasing levels of density. As communities and neighbourhoods are reformed at higher densities by market driven developers, the likelihood of low-cost housing in the private rental market being displaced is increased, resulting in more lower income households looking for affordable housing in suburban centres connected to the rest of the metropolitan area such as Cumberland Local Government Area (LGA).

Locally prepared and implemented planning strategies that aim to address housing affordability challenges will help mitigate some of these negative impacts, provided they are sufficiently ambitious and properly resourced. But the context in which urban change is currently occurring means concentrating on local strategies is only one part of managing a response. Advocating the need for affordable housing strategies to neighbouring and nearby councils, especially those where major urban redevelopment is set to occur will also be necessary. In the absence of proper city-wide or state-wide

strategies, more councils implementing local affordable housing strategies will make it easier for councils in the outer suburbs of Sydney’s metropolitan region to manage the impacts of population growth, development and urban renewal on their own communities, even while that renewal may be happening elsewhere.

Principles for Local Strategic Planning Statements

Shelter NSW does not believe a “one-size-fits-all” approach will be of value when it comes to local councils’ capacity to deliver (or facilitate the delivery of) new Affordable Housing across Sydney and New South Wales. We understand the need for variation across different areas to suit the broad range of local conditions. However, we have developed some [principles we would like to see applied](#) in all LSPS³. Our analysis and comments on Cumberland Council LSPS are underpinned by these principles.

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

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

2. The LSPS commits to developing a Local Housing Strategy

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

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

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

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

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

SEPP 70/Affordable Housing Contribution Schemes

Voluntary Planning Agreements

Section 7.11 contributions

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

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

4. The LSPS commits to housing diversity

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

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

5. The LSPS commits to social diversity

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

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

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

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

Taking the need for Housing Affordability into account in the LSPS

Shelter NSW congratulates Cumberland Council on the preparation of a LSPS to outline a high level “20 year vision for land use in the area, the special character and values that are to be preserved and how change will be managed in the future”, as required by section 3.9 of the Environment Planning and Assessment Act 1979. Producing a LSPS is critical to the development of a council’s Local Housing Strategy and revision of Local Environmental Plans (LEPs), which are actions required by the GSC Regional and District Plans.

As a suburban centre within Sydney’s Greater Metropolitan Region – a metropolis well known for its housing affordability issues– housing is expensive in Cumberland LGA but generally cheaper than it is closer to Sydney’s central business district. Rents are in line with the Greater Sydney average (e.g. median weekly rent \$455 as compared to \$447 average in Greater Sydney⁴). However, proximity to Parramatta CBD means rent and median dwelling prices are still high and out of reach for most lower income households. The LGA has a high need for affordable housing for very-low, low and moderate income households. . It is experiencing a deterioration of affordability for such households across the housing stock that already exists within the area.

Social housing stock in Cumberland LGA is insufficient to meet demand. As of 30 June 2019, there were 842 general and 57 priority applicants on the NSW Housing register for GW02 Auburn Granville FACS allocation zone, of which most areas within Cumberland LGA are part of, with expected waiting times of 5 to 10 years for studios/one bedroom dwellings and more than ten years for all types of properties, from two bedrooms to 4+ bedrooms. It is important to note that this unmet need does not reflect issues that are specific to Cumberland LGA such as the number of people seeking asylum in need of social/affordable housing that are ineligible for social housing, so are not reflected in the Housing Pathways Waiting List data. This is an issue described in the ‘State of Homelessness in Cumberland’ Research Report published in July 2018.

Shelter NSW is pleased to see that Cumberland Council recognises in Planning Priority 6, p38 of the LSPS, that “housing affordability and mix are important considerations for the Cumberland Community” and “recognises the need for affordable housing”. We strongly support this recognition, as well as the policies that are currently in place to deliver affordable housing in the LGA such as the Cumberland Interim Affordable Housing Policy 2017, as discussed further below.

We support the following actions outlined in the LSPS, Planning Priority 6:

- Action 1, complete studies on affordable housing considerations for Cumberland

⁴ See Rent and Sales Report for March 2019 Quarter, FACS: <https://www.facs.nsw.gov.au/download?file=664499>

- Action 2, identify opportunities to support the planning and delivery of affordable housing in Cumberland

While a Local Strategic Planning Statement is a high level strategic planning document, we believe that the evidence outlined in the LSPS could be further developed to strengthen the evidence base to inform actions. For example, The Cumberland Community Snapshot page 11 does not include relevant information that is essential to assessing affordable housing need such as the proportion of total and lower income households in housing stress, rental stress and mortgage stress, median rent and median income, median prices of detached and attached dwellings, current affordable housing stock and social housing stock, etc. We would suggest that such evidence is included and analysed as part of the studies on affordable housing considerations for Cumberland. . We recommend completing this research for integration into the final LSPS adopted by Council or that this evidence is integrated retrospectively in the LSPS and the LHS, which will allow a stronger evidence base for actions, ensure the need is appropriately assessed and responded to as part of the reviews of the LEP and the DCP, and provide baseline data for performance monitoring.

Current trends indicate that housing affordability will continue to decline in the area – as it will in all areas that are reasonably accessible to employment and services throughout the Sydney basin – as long as metropolitan and state-wide social and affordable housing strategies are neither developed nor adopted. The same is likely to be true of other urban centres in the outer ring and on the outskirts of Sydney’s greater metropolitan region, where households might tend to look for more affordable housing.

Commitment of the LSPS to developing a Local Housing Strategy (LHS)

Shelter NSW supports the commitment of the LSPS to identify housing opportunities and deliver housing growth that is well located and suited to the needs of current and future community members.

Cumberland Council LSPS does not include a commitment to develop a Local Housing Strategy (LHS). Section 10 of the LSPS on implementation and monitoring only mentions the development of a new LEP and DCP. While preparation of a LHS is not a statutory requirement under the EP&A Act 1979, it is required by Greater Sydney Commission for all Sydney metropolitan councils. We recommend that Council commits to developing a comprehensive Local Housing Strategy (LHS) for the LGA that identifies and prioritises the areas for growth having regard to housing demand, growth trends, and the existing and likely future housing stock. This should ideally include a specific Affordable Local Housing Strategy.

Shelter NSW recommends that the 10 and 20 year housing targets for the Cumberland LGA include targets for housing that is affordable to people on very low to moderate incomes, either through specific Affordable Rental Housing targets, or through targets for affordable housing stock as a proportion of the total stock.

Commitment to Housing Diversity

Shelter NSW supports Local Planning Priority 5 on page 37, promoting housing diversity through local planning controls and initiatives to meet the increasingly diverse needs of community members.

Housing diversity is an important part of an inclusive community and a housing stock that caters to the needs of all. We are strongly supportive of the general intent of the planning priority, deliver housing diversity to suit changing needs, and therefore recommend the following inclusion to strengthen and clarify the planning priority:

- Strengthen and clarify commentary around the intended effect of the housing diversity planning priority, noting that housing diversity strategies may have an effect on housing affordability for some moderate income earners and above, but are unlikely to deliver affordable housing for lower income earners.
- Clarify and detail further what is meant by housing diversity. Shelter NSW would see this as including diverse housing stock that includes a mix of dwelling types to meet diverse housing needs, number of bedrooms and price points.
- Consider mandating a proportion of new dwellings to have a certain number of bedrooms in strategic centres if Council has identified there is a shortfall for certain dwelling types (for example, mandate for 10% of new dwellings in strategic centres to be one bedroom apartments). This could be done at the LHS stage if considered more appropriate by Council.

Shelter NSW strongly supports accessible housing for people with diverse needs, and recommends the LSPS commits to new residential development that caters to households with specific accessibility and adaptability needs. Reference to the Liveable Housing Design Guidelines from Liveable Housing Australia could be included⁵. We recommend mandating that:

- All new apartment development achieves the silver level of the LHDG, allowing 'visitability' of dwellings for people with mobility issues
- That a proportion of all new apartment development achieves the gold or platinum level of the LHDG
- That a proportion of all new development in the LGA, including low and medium density housing, achieves the silver level of the LHDG, allowing 'visitability' of dwellings for people with mobility issues

Accessibility of public space and universal, inclusive design are also of primary importance to create healthy, inclusive communities. Concerning the accessibility of public space, we suggest that the commentary is strengthened in Local Planning Priority 7 to ensure the built environment and amenity in

⁵ See <http://www.livablehousingaustralia.org.au/95/downloads.aspx>

the LGA are designed to be accessible to all members of the community. It could include a reference to the Seven Principles of Universal Design⁶, for example.

Mixed use, functioning strategic centres are an essential part of great urban environments and thriving communities. We support Local Planning Priority 7 “Design vibrant and attractive centres”. Shelter NSW encourages Cumberland Council to consider limited delivery of housing in key centres whenever possible without undermining the main land use. This could be done by including infill possibilities in the DCP to encourage delivery of innovative, diverse housing, for example shop top housing.

Similarly we support the retention of industrial land and the transition to lighter uses (new industries) described in Section 8. We recommend that in addition, Council considers an innovative mixed use approach as part of its review of the zoning mechanisms used in the LEP. For example, exclusively allowing social and affordable housing managed by a CHP or government provider in light industrial zone when this does not preclude achieving the primary objectives of the strategy. This is being considered by Inner West Council as part of their LHS, for example, and could be an innovative way to deliver some additional affordable housing dwellings although not in high numbers. The mixed use and innovative delivery would allow for homes close to jobs, achieving the objectives outlined by Council in the LSPS page 4.

Commitment of the LSPS to address Housing Affordability

Shelter NSW strongly supports the vision outlined page 18 of the LSPS by Cumberland Council to deliver “affordability in the local housing market to meet the needs of our community”. We commend Council for using clear, academically and legally recognised definitions of affordable housing in Planning Priority 6 page 38. Delivering affordable housing will have important positive impacts on communities and the economy. It will assist Council in achieving Planning Priority 11 to promote access to local jobs. Shelter NSW is concerned, however, that the LSPS neither specifies how this vision will be delivered nor mention explicit targets for new affordable housing for very low and low income earners and how they could be delivered.

As previously mentioned, we recommend the development of a specific Local Affordable Housing Strategy, especially the identification of local sites where Council could support the delivery of new affordable housing initiatives, especially those which demonstrate innovation and partnering across the sectors to optimise outcomes for residents and the community.

Regarding the potential impacts of housing diversity strategies on housing affordability, we provide the following comment.

We fully support the principle of housing diversity and acknowledge the importance of a range of housing typologies being planned for and delivered across various localities, at increasing levels of

⁶ See Centre for Excellence in Universal Design, <http://universaldesign.ie/What-is-Universal-Design/The-7-Principles/>

density where appropriate. However, such an approach alone will not deliver meaningful improvements to housing affordability given the constraints of current federal and state policy settings, and with no known future policy or funding settings to significantly boost social and affordable housing supply. It is extremely unlikely to improve housing affordability for very low and low income households, and at best this type of strategy is likely to improve affordability only for households on moderate incomes. This can be inferred from the already noted deterioration in housing affordability across the LGA, but is also reflected in recent research, from the Australian Housing and Urban Research Institute (AHURI) which found that:

*Most of the growth in housing supply has been taking place in mid-to-high price segments, rather than low price segments. There seems to be structural impediments to the trickle-down of new housing supply. Targeted government intervention might be needed in order to ensure an adequate supply of affordable housing.*⁷

It is important for Local Government authorities to consider the types of intervention that are available to them within the policy and funding frameworks set by federal and state governments. To this end, Shelter NSW strongly recommends the development and implementation of more specific measures to address the need for more affordable housing identified in the LSPS and achieve Cumberland Council's vision:

1. The explicit recognition of affordable housing as essential social and economic infrastructure, in line with academic research and as recognised by Infrastructure Australia in the [Australian Infrastructure Audit 2019](#). This could be included on page 10 of the LSPS or in Local Planning Priorities 3, 9 and 10. It will facilitate advocacy to other levels of government for more social and affordable housing, and give Council flexibility in the future in how it finances delivery of more affordable housing through planning mechanisms.
2. The explicit listing of planning mechanisms (for example in Planning Priority 6) that Council might use to facilitate delivery of affordable housing dwellings in the future, such as SEPP 70/Affordable Housing Contribution Schemes, VPAs, or Section 7.11 contributions.
3. An explicit commitment to seeking approval for SEPP 70 schemes, (although Shelter NSW understands Council might consider this to be more appropriate at the LHS stage). Ideally this could specify the areas where an affordable housing contribution scheme under SEPP 70 is to be applied, to provide certainty to the market and the property development industry. This would be particularly appropriate in Merrylands and in other strategic centres.
4. A commitment to review development contributions levied through section 7.11 and 7.12, and consider exemptions for Community Housing Providers considering they are delivering essential infrastructure under the form of social and affordable housing.

⁷ Ong, R., Dalton, T., Gurran, N., Phelps, C., Rowley, S. and Wood, G. (2017) *Housing supply responsiveness in Australia: distribution, drivers and institutional settings*, AHURI Final Report No. 281, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/281>

5. A commitment to consider other value capture mechanisms that allow for delivery of affordable housing through rezoning, for example in Planning Priority 6.

On the specific question of seeking approval for SEPP 70 / Affordable Housing Contribution Schemes Shelter NSW understands the *housing diversity* approach places a strong reliance on rezoning and up-zoning areas for higher density residential development, leading to significant uplift in land values in the areas identified for prospective development or redevelopment. This creates opportunities for communities to share in some of the increased value and can be used to fund new infrastructure and community facilities, and this is facilitated by provisions in the *Environmental Planning and Assessment Act 1979*. We note the growing recognition at the State Government level for this to include funding for new affordable housing, as is reflected in the recent extension of SEPP 70 to allow all councils across New South Wales to adopt Affordable Housing Contribution Schemes.

Such schemes are already in operation in the City of Sydney local government area. Similar schemes are also in development in the Cities of Willoughby and Randwick, as well as the Inner West Council, for example. These schemes require developers who wish to operate within certain defined precincts, as approved and included in a revised Local Environmental Plan, to make a contribution to a Council's affordable housing program as a condition of development consent.

Importantly, where there is certainty around the requirement for developer contributions, the apparent extra costs to developers are capitalised into the price they pay for developable land. This means developers' viability considerations are not unduly impacted by the need to provide affordable housing contributions, allowing councils to fund and develop their own portfolios of targeted affordable housing through the uplift in value created by rezoning land for higher density use.

Finally, Shelter NSW draws Cumberland Council's attention to the *Strengthening Economic Cases for Housing Policies* report⁸, led by CHIA NSW and UNSW City Futures, and which Shelter NSW co-funded. This research models the significant economic and productivity gains that could be expected from a large scale program of Government investment in housing that is both well located and affordable. While it is not within the scope of a local government authority to develop a program on the scale that has been modelled, the results of this research should give Councils greater confidence that Affordable Housing Contribution Schemes, designed to fund a local affordable housing program will have discernibly positive economic impacts at the local level, which will not only benefit the affordable housing residents but the broader community and the local economy. Shelter NSW strongly advocates that affordable housing should be seen as critical social and economic infrastructure rather than seen as a "welfare" policy response. In this vein we would suggest that decision makers including Councils should harness this thinking in their policy and planning, as well as in the messaging to local communities so that the benefits of affordable housing are promoted and better understood.

⁸ Maclennan, D., Randolph, B., Crommelin, L., Witte, E., Klestov, P., Scealy, B., Brown, S. (2019) *Strengthening Economic Cases for Housing Policies*, City Futures Research Centre UNSW Built Environment, Sydney, <https://cityfutures.be.unsw.edu.au/research/projects/strengthening-economic-cases-housing-productivity-gains-better-housing-outcomes/>

Commitment of the LSPS to social diversity

Shelter NSW supports Local Planning Priority 8, “Celebrate our natural, built and cultural diversity”. We commend Council for including an explicit commitment to social diversity in its LSPS and recognising that culturally and socially diverse communities are inclusive, healthy and creative. We note however, that cultural and social diversity will need to be supported and maintained, partly because of housing affordability pressures pushing very low and low income households away from Sydney metropolitan area towards its fringes. We recommend for Council to be more explicit about the mechanisms to increase provision of affordable housing across the LGA.

We strongly support the Interim Affordable Housing Policy 2017 of Cumberland Council which sets a percentage of all new residential development to be dedicated to affordable housing (15%). We believe this should be preferably delivered on site, to ensure social and cultural diversity. The general policy position of Shelter NSW is that 15% on private land and 30% on government land are appropriate targets. Shelter NSW recommends that the LSPS commits to maintaining or increasing the proportion set by the Policy. Social diversity should be encouraged not only in areas with a high proportion of social housing stock, where State government has aimed to deconcentrate social housing in recent years, but also in other areas through implementation of inclusionary zoning mechanisms.

Commitment of the LSPS to further advocacy from local government for social and affordable housing

Shelter NSW is pleased that the Cumberland LSPS recognises that housing affordability is a complex issue that needs to be tackled by all levels of government. Shelter NSW’ position is that partnering across all three levels of Government, as well as the not for profit and private sectors is vital to achieving sustainable social and economic outcomes for residents. We commend Council for demonstrating leadership in this regard, including in partnership with Shelter NSW, for example through the recent ‘State of Homelessness in Cumberland’ forum and the development of an action plan to address homelessness in the area.

The LSPS could recommend further advocacy by Council to the NSW and Australian Governments for more social and affordable housing to be developed in the local area, to be funded by mechanisms including those outside of the planning system, such as those outlined in Shelter NSW, National Shelter or CHIA policy and platform documents.

Planning Priority 15, “Strengthening relationships with key stakeholders”, mentions that “*collaboration is essential in planning and delivering infrastructure to keep pace with population growth*”.

Shelter NSW recommends:

1. Commitment to advocate to NSW and Federal Governments for more social and affordable housing in Cumberland LGA, for example in Planning Priority 1.

2. That the LSPS includes recommendations for Council to tackle housing affordability issues at both the metropolitan and regional level, for example through collaboration with other LGAs, to advocate for development of a Regional Affordable Housing Strategy to operate across council borders. This could be included in Planning Priority 1, “Strengthen Cumberland’s position in the Central City District through collaboration”.

It is important to recognise that we need to tackle housing affordability issues at the metropolitan and regional level. Advocacy from local government to state and federal governments for direct investment in social and affordable housing would assist local government and the planning system and recognises the need for a systemic response to addressing a public policy issue that involves responsibility by all levels of Government.

Implementation, Monitoring and Reporting

Shelter NSW strongly supports the commitment of Council to work to ensure the on-going alignment of the LSPS with Council’s overarching community strategic planning, as well as the commitment to review the LSPS every five years (page 52).

As mentioned previously, we are concerned, however, with the lack of specific data and evidence around housing affordability in the area. The LSPS *Implementation, Monitoring and Reporting* section does not include any specific indicators to measure success regarding better housing affordability in the area. This is especially important given the need identified by Council in the LSPS. We recommend the inclusion in the Implementation Section of performance indicators specific to housing affordability such as:

- Decrease in proportion of residents of the LGA in housing stress
- Decrease in unmet affordable housing need
- Increase in proportion/number of dwellings in the area that are affordable to people on low to moderate incomes

Summary of Recommendations

1. Include additional local data about housing affordability in the LSPS (median income, median dwelling prices, levels of housing stress, mortgage stress, etc.)
2. Commit to developing a comprehensive Local Housing Strategy (LHS) for the LGA.
3. Strengthen and clarify commentary around housing diversity and include the planning mechanisms Council will use to promote a more diverse housing supply.
4. Consider mandating dwelling mix in strategic centres to ensure there is a supply of dwellings that are adapted to the needs of all community members.
5. Commit to new residential development that caters to households with specific accessibility and adaptability needs by including targets in the LSPS for a certain proportion of dwellings to achieve silver and gold levels of the Liveable Housing Design Guidelines.

6. Strengthen the commentary around accessibility of public space and the urban environment by referring to the principles of universal design
7. Include as an action in the LSPS that Council will consider innovative housing delivery in strategic centres and light industrial zones as part of the review of its LEP/DCP, such as shop top housing in centres and affordable housing in light industrial zones.
8. Include affordable housing dwellings targets and explicit listing of planning mechanisms (for example in Planning Priority 6) that Council might use to facilitate delivery of affordable housing dwellings in the future, such as SEPP 70/Affordable Housing Contribution Schemes, VPAs, or Section 7.11 contributions.
9. Recognise explicitly that affordable housing is essential social and economic infrastructure in Local Planning Priorities 3, 9 and 10.
10. Commit to seeking approval for affordable housing contributions schemes under SEPP 70
11. Commit to reviewing development contributions levied through section 7.11 and 7.12, and consider exemptions for Community Housing Providers considering they are delivering essential infrastructure under the form of social and affordable housing.
12. Commit to consider other value capture mechanisms that allow for delivery of affordable housing through rezoning, for example in Planning Priority 6.
13. State explicitly in the LSPS that Council will maintain or increase the 15% proportion of all new residential development that should be dedicated to affordable housing as set by the Interim Affordable Housing Policy 2017 and strengthen the requirements for this to be preferably delivered on site.
14. Commit to advocate to NSW and Federal Governments for more social and affordable housing in Cumberland LGA.
15. Commit to tackle housing affordability issues at both the metropolitan and regional level in collaboration with other for example through the development of a Regional Affordable Housing Strategy to operate across council borders.
16. Review and amend the monitoring section (section 10) to include key performance indicators related to housing affordability. This is dependent on implementing recommendation 1 which will establish the baseline.

Further discussion

Thank you for the opportunity to take part in the formulation of Cumberland Council Local Strategic Planning Statement. Shelter NSW, as a housing policy and advocacy peak is keen to continue to work with and support Council on the further development of the LSPS and the LHS.

Please do not hesitate to contact Thomas Chailloux on (02) 9267 5733 or thomas@shelternsw.org.au in the first instance if you wish to discuss these comments.

Yours sincerely

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