

Shelter NSW Submission

Draft Broken Hill Local Strategic Planning Statement



Introduction

Shelter NSW appreciates the opportunity to comment on the Draft Broken Hill Local Strategic Planning Statement (LSPS) (2020). We congratulate Council on the high standard of its draft plan, and we support many of the proposed Actions outlined which aim to deliver both housing choice and affordability in the context of a sustainable future.

From Shelter NSW's perspective, we see the LSPS process as an opportunity to promote dialogue about ways to deliver homes that meet the needs of all NSW residents. The purpose of this submission is to advocate for housing outcomes that address the longer-term systemic housing needs of both regional and urban communities. Having reviewed the Draft Broken Hill LSPS, Shelter NSW has provided practical policy suggestions that we feel might support or strengthen the housing-related Actions outlined in your statement.

Our submission also provides an overview of Shelter NSW's role as the NSW State peak body in the housing policy and advocacy space and a summary of the key messages we recently heard during our community and stakeholder consultation sessions across NSW on what a desirable housing system should deliver.

About Shelter NSW

Shelter NSW was established in 1975 as the NSW State Housing peak body, advocating for better housing outcomes in response to urban redevelopment pressures. From this origin, we grew to now representing the broad interests of a diverse network of partner and member organisations and individuals who share our vision of a secure home for all NSW residents. We pursue this vision through critical engagement with policy and collaborative leadership initiatives.

Shelter NSW is an independent, non-profit organisation, advocating for systemic housing policy reform and providing advice on strategies and legislation. In doing so, we research the causes of inequity within the NSW housing system and promote solutions that ensure better housing outcomes for people experiencing different levels of housing stress. We then leverage this expertise to engage and collaborate with the sector to work towards an economically, socially, and environmentally sustainable housing system.



Key messages from Shelter NSW wide visioning sessions

In 2019, Shelter NSW held seven workshops across regional NSW and Greater Sydney to develop a shared vision for a better housing system. Close to 200 community members spoke at these sessions about the problems they see as facing the housing system and the actions they want to see to address them. Here is a summary of their insights that are relevant to all levels of Government.

1. Make plans that emphasise housing as a home, not just an investment

The concept of 'home' should be at the core of the housing policy. It underpins health, social connections and participation in work and society. However, speculative investment in housing and the standard model of developments are not delivering housing that people need or can afford. The Government needs to talk with communities about these problems and discuss solutions. Following this engagement, they should make a plan for the specific region that addresses the issues they can control and works with other levels of Government on ones they cannot.

2. Build places and communities, not just houses and towers

New housing should be located close to jobs and services and improve the quality of existing neighbourhoods. Well-connected and well-designed homes make it easy for people to get around and transition between various stages of life. However, developers seem to be delivering either car-dependent sprawl or low-quality density. Both result in different kinds of congestion and unpleasant environments. Government authorities can help achieve this through planning, support for innovative designs and investment in infrastructure.

3. Provide diverse housing that everyone can afford, not just high-income earners

The housing system should be as diverse as the community to give people the options they need. This system would support ageing households with the opportunity to downsize, and young people with the possibilities to become independent. Women can then leave abusive relationships, and First Nations people can live on Country. Students can then focus on their education, and key workers can live in their communities. Most importantly, people experiencing or at risk of homelessness can find a secure home. To provide these options, governments need to invest in social and affordable housing as well as create more diversity in the housing market.

4. Make renting a genuine alternative to ownership, not just a transition phase

Tenants should be able to expect security and a high level of service when they rent their home. This protection is especially true now that homeownership is in decline. However, the possibility of no-grounds evictions makes it hard for tenants to put down roots or request repairs. Equally, social housing has become seen as a temporary safety net which is increasingly rationed and run-down. Governments need to ensure rental housing is both secure and high quality. It can do so by amending laws and policies that support long-term renters and providers of suitable housing options.



5. Use housing policy to address climate change, not exacerbate it

Our built environment should help us transition to a zero-carbon economy. Housing design and construction techniques can reduce our energy consumption and extraction of new resources. So too can planning and subdivision protect our homes from natural hazards and limit our reliance on cars and lifts. Trees can cool our streets, and infrastructure can make them walkable. All of this improves our health and saves us money. Governments need to use all of these tools to prevent and avoid the worst effects of climate change which we are just starting to see and feel.

Shelter NSW Comments on the Draft Broken Hill Regional Local Strategic Planning Statement

Inland regional centres in NSW are largely dominated by freestanding housing stock, with a significant percentage of homes occupied by 'empty nesters', many of whom have reached retirement age. This, combined with a declining younger population, creates a unique housing issue for the population of Broken Hill. Based on 2016 census data, 28.9% of the Broken Hill Local Government Area's (LGA) population were aged 60 years and over, which is above both the regional and NSW State average. The data also showed that over 92% of the LGA's housing stock was made-up of separate dwellings, 20.6% of dwellings were unoccupied and around 2% of residents were living in Caravans or Cabins.

While Broken Hill clearly has an ageing population and the housing needs of these older residents must be considered, many young people and itinerant workers have different housing needs and often prefer to live close to town centres. To address the needs of both younger and older residents and mitigate against ongoing population decline, Council will need to explore ways to deliver smaller homes located in its town centre. Achieving more housing diversity in town centres will allow older residents to stay connected to their communities and be independent. It will also support essential service workers and provide young residents with different lifestyle opportunities.

The Aboriginal and Torres Strait Islander population makes up over 8%, compared with the NSW average of 2.9%, and this community often too have particular housing-related issues. One is limited access to affordable rental supply, and another is overcrowding which can have specific longer-term impacts regarding social and educational outcomes.

As outlined in the Council draft LSPS, the LGA has a population that is in decline and a mismatch between housing needs and supply for particular segments of the population. To address this, Council will need to explore strategies that support delivery of a mix of housing types close to town, and this will be a significant task.



Shelter NSW perceives basing new residential developments on clustered dwelling patterns as one way to deliver better long-term housing outcomes in regional NSW. These types of developments provide opportunities for consolidated landscaping and vegetation, reduce the risk of bushfires and facilitate the delivery of better water management practices. In addition to these benefits, clustered developments deliver better economic outcomes for smaller regional centres.

The following table outlines the proposed housing related planning priorities and actions in the Draft Broken Hill LSPS and provides feedback from Shelter NSW on ways to support or strengthen them. In situations where Shelter NSW suggestions go beyond the direct control of Council, we are happy to collaborate with the Council in any future advocacy-based actions.

Shelter NSW Comments on Housing Related Issues in the Broken Hill Council Draft Local Strategic Planning Statement

Planning priority for Housing Action

- Investigate opportunities to work with social housing providers.
- Investigate incentives to encourage renovation, redevelopment or removal of dilapidated housing stock.
- Review the Broken Hill Local Environmental Plan 2013 heritage listing and heritage conservation areas.
- Investigate the need to liberalise land-use restrictions on land zoned R1 General Residential on the edge of Broken Hill to allow for keeping of horses.

In response to Council's stated planning and housing priorities outlined above, Shelter NSW makes the following suggestions.

Investigate Opportunities to Work with Social Housing Providers

Shelter NSW recommends that Council co-ordinate a housing workshop with Community Housing Providers such as Murdi Paaki Regional Housing, Compass Housing, the Department of Communities and Justice, Office of Aboriginal Housing and the NSW Aboriginal Land Council aimed at facilitating the maintenance, general upkeep and delivery of affordable housing options for disadvantaged members of the community.

Acknowledge and Support Aboriginal Housing

Shelter NSW would like to see a commitment by the Council to support Local Aboriginal Land Council to deliver additional housing opportunities. This work could include collaboration with Land Councils on the development of a strategic plan for their landholders.



The primary aim would be to support the delivery of additional housing opportunities and appropriate design outcomes on Aboriginal owned land. This work can be based on the Aboriginal Land Framework (introduced by the NSW Planning System in 2019).

Proposed Actions:

1. Work cooperatively with LALC to rezone land so that it can be used for additional social housing.
 2. Explore ways to support secondary dwellings/granny flat accommodation on existing Aboriginal/social housing lots.
 3. Encourage the construction of additional Aboriginal social housing stock so that the underutilisation of existing housing and essential service can be addressed.
 4. Work with public, community and Aboriginal housing providers to ensure dwellings are adequately maintained to improve the survivability of structures under bushfire or drought threat.
 5. Work with public, community and Aboriginal housing providers to find solutions which address the issue of overcrowding in Aboriginal housing. Such solutions could include;
- flexible design allowance in DCP to expand and/or close off the edges of houses to provide additional outdoor areas
- housing design layouts that support both cooling and heating functions throughout the entire building.

Review Land Use Planning Provisions to Facilitate Greater Housing Choice, Particularly in Locations Connected to Essential Infrastructure and Services

- Shelter NSW recommends that as part of any CBD or 'town centre' master plan, Council considers various ways to deliver housing diversity. These could include;
- Introduction of more medium density (R3) zones
- Encouragement of the delivery of diverse dwelling types and mandate bedroom mix.
- Including incentives in its DCP and mandating a mix of dwelling and bedroom types in new development.

The aim would be to support the delivery of homes that meet the needs of younger residents and deliver alternative housing options for older residents to age in place.

Delivering Housing Choice to Address Unmet Need

Shelter NSW feels that some of the housing products in the NSW Government new 'Low Rise Housing Diversity Code' could support regional centres like Broken Hill to deliver different forms of housing in its town centres. However, Shelter NSW is concerned that several requirements in the 'Code' disincentivised the provision of many of the housing products in regional NSW.



From our perspective, this is the result of 'Low Rise Housing Diversity Code' having a metro-centric focus in its standards. Many of the development requirements in the 'Code' don't respond to the characteristics of main streets and town centres across regional NSW with standards such as building height, maximum gross floor area, setback and landscaping requirements meaning some of the housing models in the 'Code' could not be built in a regional setting. Furthermore, even if these developments were able to proceed regionally, the standards required would diminish the main street character and local communities would reject the products outright. One example of this is Manor Houses which have the potential to provide smaller dwellings within a regional main street setting. However, because the setback requirements are determined based on the two nearest buildings that are residential accommodation, the opportunity to deliver Manor Houses within a regional commercial main street environment is virtually excluded.

Shelter NSW suggests that the Council approach the NSW Department of Planning, Industry and Environment to work on the development of a modified version of the 'Low Rise Housing Diversity Code' to deliver a 'Code' that is responsive to the needs of regional centres. Alternatively, Council could develop a strategic framework to support alternative housing options to be built in its town centre.

Maintain the Local Built Form Character Through Best Practice Design Outcomes

To ensure that any new or infill or residential developments enhance the existing build form in regional town centres, Shelter NSW recommends Council include a local character assessment requirement into its DCP.

Housing Developments that are Resilience to Climate Change Impacts

Shelter NSW sees basing new residential developments on clustering dwelling patterns as one way to deliver better long-term housing outcomes that address the impact of climate change in regional areas. Clustering development patterns provide opportunities for consolidated landscaping and vegetation, reduce the risk of bushfire/floods and facilitate the delivery of better water management practices. As such, we recommend that new semi-urban or fringe residential release areas be based on the General Residential (R1) zones combined with bush fire and flood management criteria as opposed to Low-Density or large lot residential zones.

Workshops with Local Developers and Builders on Ways to Deliver More Diverse Housing Opportunities in Town Centres

Council could organise a workshop with local developers, industry leaders and builders on ways to deliver more diverse housing opportunities.

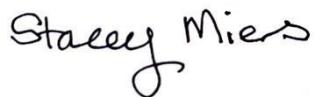


Thank you

Shelter NSW appreciates the opportunity to comment on the Draft Broken Hill Local Strategic Planning Statement. We hope that the comments and insights we have provided bring some value to Council's strategic planning work in the housing policy space.

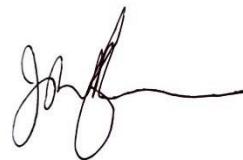
We are also happy to engage with Council on the issues raised in our submission. If you wish to discuss our submission in more detail, please contact Stacey Miers on 0410 633 272 or by email at stacey@shelternsw.org.au.

Sincerely Yours,



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Stacey Miers

Sincerely Yours,



Chief Executive Officer Shelter NSW
John Engeler

