



Shelter NSW Submission

Shelter NSW Submission Draft Coffs Harbour Regional City Action Plan 2036

Introduction

Shelter NSW appreciates the opportunity to comment on the draft Coffs Harbour Regional City Action Plan 2036. As the NSW State's peak body for housing policy advocacy, we commend the plan's proposed future land uses that align with our vision of a secure home for all. We consider the priorities and actions outlined in the document as appropriate responses to the issues it seeks to address. They also reflect the community views that Shelter NSW staff heard when conducting consultation sessions in the region in 2019.

The purpose of this submission is to acknowledge the local housing issues in the Coffs Harbour Regional City Action Plan (2036) and comment on the proposed priorities and actions. In all cases, we support the strategies presented, so we do not recommend any changes.

About Shelter NSW

Shelter NSW is the state peak body for housing policy advocacy. Established in 1975, we represent broad interests across the housing system instead of a specific industry or sector view. Our diverse network of partners includes organisations and individuals that share our vision of a secure home for all. We pursue this vision through critical engagement with policy and by providing thought leadership. As an independent non-profit organisation, we advocate for systemic housing policy reform and provide advice on policy 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 households on lower-incomes. We then leverage this expertise to engage and collaborate with the sector to work towards an economically, socially, and environmentally sustainable housing system.



Shelter NSW comments on the following housing related priorities and actions for the Region

Regional City Action Plan 2036

Objective 16 Deliver a compact city that responds to Coffs Harbour's unique green cradle setting and offer housing choice.

Action 16.1 Promote a sustainable growth footprint and enhance place-specific character and design outcomes.

Action 16.2 Implement incentives to support infill development.

Action 16.3 Promote low-rise medium density housing opportunities in areas with access to services and public open space.

Shelter NSW Suggestions

Shelter NSW is concerned that long-term housing supply trends have not addressed the gap between housing supply, choice, affordability and need. All regional areas across NSW have a shortage of affordable housing for low income households. We believe the lack of metrics linking supply, affordability and resilience for a diverse and growing population undermines the strength and potential impact of the overall land use planning strategy. In response, we make the following recommendations;

1. Introduce funding and planning measures that enable new development in existing and emerging centres. Examples include public investment in active and mass transit infrastructure along with sequenced rezoning to permit medium and high-density housing types. Additionally, we recommend the implementation of value capture mechanisms, such as betterment taxes and contribution schemes, that use the resulting uplift in land values to pay for essential infrastructure including affordable housing.
2. Maintain a register of public land suitable for social and affordable housing development. This data set should be used to quantify the amount of available land and estimate what proportion of housing demand can be met through land grants, discounted sales or leasehold arrangements. Such data could be shared and visualised through a publicly accessible spatial mapping tool similar to the one already used by the Department.
3. Utilise a valuation model that assesses the uplift in land value generated by rezoning and infrastructure decisions and the impact of contribution schemes on development feasibility. The financial data could be used to quantify the amount of funds that can be generated through value capture mechanisms such as betterment taxes and infrastructure contribution schemes including for essential infrastructure and affordable housing.
4. Commit to an increase in the supply of social and affordable housing that is proportional to demand across regional NSW. The NSW Government should commit to using its planning instruments, surplus land and development corporations to support an economic infrastructure pipeline of affordable housing.



Shelter NSW Comments

Shelter NSW believes there is an opportunity to apply elements of the planning system to meet the housing needs of people in Regional NSW, both current and emerging. Firstly, the approval of any new residential developments in regional NSW should be based on clustering dwelling patterns or medium density development connected to town centres. Secondly, a review of the 'Low Rise Housing Diversity Code' is required to ensure that its standards are not creating a barrier to greater density in regional areas.

A recent analysis by Shelter NSW of many regional *Local Strategic Planning Statements* (LSPS) revealed that many regional centres have a significant mismatch between housing supply and population need. For example, population data indicates that in many LGAs, more than 20% of the population is over 60 years and older and mostly living in lone person households. At the same time, over 95% of the housing stock is stand-alone dwellings or on large lot subdivisions.

For Local Government Authorities, this is a difficult situation to resolve as many of these towns have limited new housing supply. They also have the added problem of a local development industry that is focused on rezoning rural land to residential and building new, large-lot residential subdivision on the edge of town. As a result, most new housing supply does not address the current mis-match between housing choice and need.

The following recommendations aim to address the capacity of the General Residential (R1) Zones and Medium Density Residential (R3) Zone to provide more housing choice in regional areas dominated by detached dwellings. The recommendation aims to support the delivery of sustainable local communities into the future and to ensure that new residential developments are based on clustering dwelling patterns or medium density development in town centres. The benefit of such action is substantial; it can support the delivery of different housing options in town centres, better support the economic base of a small town and address the needs of both younger and older, single residents to live in smaller dwellings connected to town centres. This initiative can also provide better sustainability outcomes through consolidated vegetation, reduced bushfire impacts and better water management practices.

Shelter NSW has also considered the impact and requirements of the 'Low Rise Housing Diversity Code' ('the Code'). We have consulted experienced industry experts in our review. We are concerned that many of the requirement in the Code discourages the provision of many housing products in regional NSW and that, generally, the Code is too metro-centric.

Many of the complying development requirements in the 'Code' don't respond to the characteristics of many 'main street' regional centres. For example, standards such as building height, maximum gross floor area, setback and landscaping requirements would mean some of the housing models in the Code could not be built in a main street regional setting. Further, the application of the standards would likely diminish the main street character and we would therefore expect local communities to reject the products outright.



Consider Manor Houses as an illustration. Manor houses have the potential to provide smaller dwellings within a regional main street setting such as Coffs Harbour. However, setback requirements are determined based on the two nearest buildings that are residential accommodation. This requirement virtually excludes the opportunity to deliver Manor Houses in a regional commercial main street environment. Even on the issue of landscaping in a regional context, manor houses on main streets could have planter boxes and rear balconies and still satisfy the 'spirit' of the Code.

Shelter NSW Recommendations

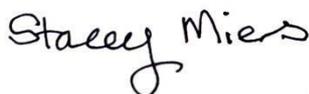
That the NSW Department of Planning, Industry and Environment;

- Review Local Environmental Planning Polices, and consider replacing their existing Low-Density Residential (RU5) Village, Large Lot Residential (R5) Low-Density Residential (R2) zones with General Residential (R1), and Medium Density Residential (R3) zones in locations connected to essential infrastructures such as town centres, education hubs, medical facilities and transport hubs.
- Review the 'Low Rise Housing Diversity Code' to ensure it responds to the needs of regional centres (ensuring it is not too metro-centric).
- Work with Coffs Harbour Council to organise a forum to develop a strategic framework to support alternative housing options in regional town centres.

Thank you

Shelter NSW appreciates the opportunity to comment on future land use planning in the Draft Coffs Harbour Regional City Action Plan 2036. We hope that our comments support the intended priorities. If there is any way in which Shelter NSW can assist in achieving the aims of the plan through our broader advocacy, please contact Stacey Miers on 0410 633 272 or by email at stacey@shelternsw.org.au.

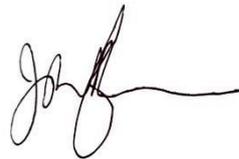
Sincerely Yours,



Principle Policy Officer Shelter NSW

Stacey Miers

Sincerely Yours,



Chief Executive Officer Shelter NSW

John Engeler

