

# Shelter NSW Submission

## Draft Albury City Local Strategic Planning Statement



### Introduction

Shelter NSW appreciates the opportunity to comment on the Draft Albury City 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.

Shelter NSW sees 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 Albury City LSPS, Shelter NSW has provided practical policy suggestions that we feel might support or strengthen the delivery of housing Actions outlined in your statement.

Shelter NSW's submission also provides an overview of our role as the NSW State peak body for housing policy and advocacy 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 Albury City Regional Local Strategic Planning Statement

NSW's inland regional centres are primarily dominated by freestanding housing stock, with a significant percentage of homes occupied by 'empty nesters' and retirees. Albury City Local Government Area's (LGA) exemplifies this, with the average age at 39 years, and 23% of the population aged 60 years and over. The 2016 Census reports that around 30% of homes were lone person households, 77% of the housing stock was made-up of separate dwellings, and 10.6% of homes were unoccupied.

32% of Albury City's population rented (a 2% increase from the previous census period), 4.0% of renters were public housing tenants and the LGA had seen a loss in public housing based on earlier census periods. Those with a housing mortgage made up 30.4%. This was a 3% decline based on the previous census. Based on this data, the LGA is experiencing a growing percentage of its population in the private rental market.

While Albury City 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.

Aboriginal and Torres Strait Islander population makes up over 2.8% and Albury City community and these residents often to 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.

How to deliver mitigation measures in response to the matters outlined in the Draft LSPS and above will be a significant task for Council. Shelter NSW sees the development of strategies that support the delivery of a mix of housing types close to town and new residential developments based on clustered dwelling patterns as ways to create better long-term housing outcomes in regional NSW. These types of development strategies 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 regional centres.

The following table outlines some proposed housing-related planning priorities and actions related to the Draft Albury City LSPS. It also provides feedback from Shelter NSW on ways to support or strengthen the identified planning priorities. 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 and Sustainability Related Issues in the Albury City Council Draft Local Strategic Planning Statement

### Housing and Sustainability Related Planning Priority

- Priority 2: Diverse, well-designed and affordable housing
- Priority 3: A growing sustainable economy
- Priority 6: Vibrant CBDs and strong local centres
- Priority 10: Adapting to the impacts of urban and natural hazards and climate change
- Priority 11: Protect, conserve and celebrate our natural, built and Aboriginal cultural heritage

### Prepare a comprehensive Housing Strategy incorporating sub-strategies to deliver Affordable Housing and prevent Homelessness.

Shelter NSW suggests that the Housing Strategy include the following actions.

**Establish an affordable rental target for the LGA.** This target could be broad; around 20% of all housing stock. The overall percentage could be broken down into affordable rental, community housing, and public housing. One example of this is Sydney City Council 'Sustainable Sydney' 2030 which establishes the following targets by 2030: 7.5% of all homes in the local area will be social housing provided by the government and community providers, and 7.5% will be affordable housing delivered by not-for-profit or other providers. We recommend that Council collect and analyse data related to housing affordability so that the targets are measurable.

**Implement an affordable housing scheme in line with SEPP 70** (Affordable Housing Contributions Scheme). Shelter NSW suggests that the Council create a planning agreement framework to capture a percentage of planning benefits (uplift value) linked with delivering new affordable housing products. In line with this initiative, Council could include a clause to provide affordable housing in your planning agreement policy - see example of Randwick Council:

[https://www.randwick.nsw.gov.au/data/assets/pdf\\_file/0007/25990/PlanningAgreements-Policy.pdf](https://www.randwick.nsw.gov.au/data/assets/pdf_file/0007/25990/PlanningAgreements-Policy.pdf)

**Provide incentives to organisations or authorities that deliver affordable housing in perpetuity.** The housing strategy could include the following incentives to organisations or authorities that deliver affordable housing in perpetuity: a fast track DA process, fee reduction or waiver, density bonus, car parking reduction bonus, waving or varying s7.11 contributions. We recommend that any exemption should be targeted at public housing or not-for-profit developers (CHPs), linked to the affordable housing being secured in perpetuity, not for a minimum of ten years.

**Define affordable housing as essential infrastructure.** We would encourage Council to define affordable housing (including public and community housing) as essential



infrastructure in its housing/residential policy and future documents (This definition is from the Australian Infrastructure Audit 2019).

### **Investigate Opportunities to Work with Social Housing Providers**

Council to co-ordinate a housing workshop, aimed at facilitating the maintenance, general upkeep and delivery of affordable housing options for disadvantaged members of the community, with Community Housing Providers, the Department of Communities and Justice, Office of Aboriginal Housing and the NSW Aboriginal Land Council.

### **Encourage a mix of residential developments that respond to demographic trends of increasing lone-person households and ageing population.**

Shelter NSW feels that, given the current overwhelming trend to rezone rural land for residential use and build three-and four-bedrooms dwellings, strong incentives will be required to ensure a better match of bedroom types to demand into the future. Council should create incentives to encourage diversity in housing stock across LGA in particular more one and two-bedroom dwellings. To support this action, Shelter suggests that Council implement a planning incentive policy to encourage diversity in housing stock across the LGA; in particular, the development of more one and two-bedroom dwellings. These types of initiatives are important given that any additional dwellings would represent a small percentage and change occurs very slowly.

Shelter suggests that Council undertake a workshop with local developers and builders on ways to deliver more diverse housing opportunities linked to town centres and essential Infrastructure.

### **Support infill development and revitalisation of established residential areas including increased housing choice such as town houses, villas and apartments connected to existing centres and essential Infrastructure.**

The aim of the following initiatives 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.

- Shelter NSW suggests that Council look at ways to deliver seniors housing in locations close to town and villages centres (taking into consideration land and environmental constraints) to close the gap between current and future housing supply and the needs of older residents.
- Shelter NSW recommends that as part of any CBD or 'town centre' master plan, Council considers various ways to deliver housing diversity. This could include the introduction of more medium density (R3) zones
- Including incentives in the DCP that mandate a mix of dwelling and bedroom types in new development.

### **Delivering Housing Choice to Address Unmet Housing 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 Albury City 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 these housing products in regional NSW.

From our perspective, this is the result of the 'Low Rise Housing Diversity Code' having a metro-centric focus in its standards. Many of the development standards 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 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 main street housing options to be built.

#### **Maintain 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 main street 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 large lot residential subdivision zones.

#### **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:

- Work cooperatively with LALC to rezone land so that it can be used for additional social housing.
- Explore ways to support secondary dwellings/granny flat accommodation on existing Aboriginal/social housing lots.
- Encourage the construction of additional Aboriginal social housing stock so that the underutilisation of existing housing and essential service can be addressed.
- 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.
- 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, and  
housing design layouts that support both cooling and heating functions throughout the entire building.

## Thank you

Shelter NSW appreciates the opportunity to comment on the Draft Albury City 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.

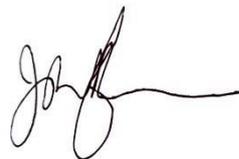
We are also happy to engage with Council on the issues raised in our submission. If you wish to discuss our submission in more detail, please contact Stacey Miers on 0410 633 272 or by email at [stacey@shelternsw.org.au](mailto:stacey@shelternsw.org.au).

Sincerely Yours,



Principle Policy Officer Shelter NSW  
Stacey Miers

Sincerely Yours,



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