

Submission

Draft Local Strategic Planning Statement

Tamworth Regional Council: Blueprint 100



Introduction

Shelter NSW appreciates the opportunity to comment on Tamworth Regional Council's Regional Blueprint 100', and its Draft Local Strategic Planning Statement (LSPS) 2020. We congratulate Tamworth Regional Council (TRC) on these reports, which set out the council's strategic aims and objectives for its land use plans over the next 20 years. We strongly support the council's commitment to enhancing people's quality of life, being respectful of the region's culture and natural environment, and delivering greater prosperity to the region.

As the LSPS will build a bridge between state and local government plans for land use, it is a crucial opportunity to promote dialogue about a better housing system, and as such, Shelter NSW will be making submissions on select draft statements in regional areas expecting significant residential growth.

Having reviewed TRC's "Regional Blueprint 100" and its Draft LSPS 2020 we have identified a number of practical policy and planning mechanisms that could be used to either support or strengthen the final LSPS in its aim to deliver both affordable and more diverse housing options.

Our submission is structured in four parts. We have provided an overview of Shelter NSW's role as the state's peak body for housing policy advocacy; a summary of the key messages we heard throughout our recent consultation sessions across NSW to develop a new vision for future housing platforms; an overview of the critical housing Actions in the draft LSPS with comments; and finally, we make several recommendations seeking endorsement from the Council to be included as Actions for the final LSPS.

About Shelter NSW

Shelter NSW is the state's peak body for housing policy advocacy. Established in 1975, we represent broad interests across the housing system rather than 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 inequality within the NSW housing system and promote solutions that ensure better housing outcomes for vulnerable households. 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's visioning sessions

In 2019, Shelter NSW held 7 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 housing policy. A home provides security, stability and safety. It underpins health, social connections and participation in work and society. However, speculative investment in housing and the standard model of development is not delivering housing people need or can afford. Government needs to talk with communities about these problems and discuss solutions. Once they do, they should make a plan for specific regions that addresses the issues they can control and work 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. They need to find a middle ground to win community support. Government can help them do so through its 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. Ageing households can then downsize and young people can 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 important, people experiencing 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 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. Government needs 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 appropriate housing.

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.

Local Housing Issues in Tamworth LGA

TRC's 'Regional Blueprint 100' and its Draft LSPS 2020 core strategies include several housing-related priorities. Shelter NSW acknowledges that the priorities outlined in these reports reflect many of the concerns and aspirations raised by participants throughout Shelter NSW's regional visioning sessions undertaken in 2019.

Shelter NSW commends the inclusion of strategies aimed at delivering housing affordability and improving livability. We support TRC's holistic approach, which aims to provide more affordable housing, encourage housing stock diversity, linked to energy and transport efficiency outcomes.

Facilitate Smart Growth and Housing Choice

Shelter NSW supports TRC's assessment of the need for more diverse and affordable housing options within the LGA, especially the commitment to deliver housing options that adapt to the needs of an aging population. We also agree that simply promoting aggregate housing growth will not serve the community well, as it reduces the viability of commercial precincts, creates higher utility costs per household, negative ecological consequences, and negative impacts on agricultural and environmental land.

The general intent of the strategy is to contain future outward housing growth and to explore opportunities to deliver more diverse and affordable housing options within the LGA. We note that 'affordable housing' is a specific housing product and has a statutory definition, as housing that is affordable to very low-, low-, and moderate-income households or a combination thereof.

Concerning the broader question of housing affordability, we know that land supply alone has not delivered housing affordability, nor has it solved Australia's unmet housing needs. This situation is partly because developers play an essential role in delivering new housing stock, however, their primary concern is how to achieve a profitable product, not on how to provide housing choice or affordability.

For this reason, the most efficient strategy to improve housing affordability is the delivery of precisely targeted housing products. This could take the form of medium-density dwellings, targeted to low-income households, managed by a Community Housing Provider (CHP) or Government authorities. Housing choice can also be addressed as a requirement outlined in planning controls.

While keeping this in mind, we support TRC's proposed housing diversity strategies as they provide an opportunity to deliver housing options that address the needs of the whole community. Mixed-use precincts are more productive, economically viable and sustainable and therefore should be encouraged, in particular in regional areas where land uses have historically been strictly separated and housing supply has been dominated by stand-alone dwellings dependent on individual car transport. The delivery of housing products such as Shop-top housing, apartments, and townhouses are an important initiative to address the needs of the broader community. For the reasons outlined above we support the internal development of Tamworth Town Centre, and would recommend that the Council apply similar actions to other precincts within the LGA to avoid unnecessary outward sprawl.

Encouraging aging in place is another key issue which is recognised in the Draft LSPS, and is a vital aspect of planning for older residents to live independently for as long as possible. A significant initiative in this space has been the adoption of universal design practice, such as the use of the Livable Housing Guidelines,

which ensures dwellings are more accessible, better designed, and easier to use. These guidelines can also deliver better design outcomes for the whole community, not only the elderly. With these issues in mind Shelter NSW supports the Actions to which the council has committed in this space. We would also like the council to consider the implementation of a single General Residential R1 zone across the whole LGA to support the delivery of different housing options in each area which will in turn support people to age in place.

Shelter NSW Supports the Following Actions Aimed at Delivering Housing Affordability & Choice

This section outlines the identified actions from TRC’s ‘Regional Blueprint 100’, and its Draft LSPS 2020, related to the delivery of housing affordability and choice. We have highlighted in **bold** the proposed housing-related Actions that have been identified in the LSPS, and provided additional feedback on ways to support or strengthen these Actions. In the case that our suggestions go beyond the direct control of the council, we are happy to collaborate on any future work in our capacity as the peak housing advocacy body for NSW.

Table of Proposed Actions & Comments
<ul style="list-style-type: none"> ● Council to develop a Tamworth Town Centre precinct plan, including consideration of shop-top housing and more apartment-style developments. Shelter NSW suggests that the council consider including several additional locations as part of its “centres” precinct plan beyond the current CBD. We feel that Tamworth LGA has several key precincts connected with essential services that could be part of a broader precinct-based approach to planning. The precincts could aim to deliver a variety of housing options linked to essential services such as shopping centre facilities, education, medical and transport infrastructure.
<ul style="list-style-type: none"> ● Council to consider smaller minimum lot sizes. We feel that the delivery of smaller dwelling lots is a good initiative, particularly as it relates to the development of smaller villages and town-centre communities. We would also like the council to consider the implementation of a single General Residential R1 zone across the whole LGA to support the delivery of different housing options.
<ul style="list-style-type: none"> ● Council to consider waiving or varying s7.11 contributions for affordable housing developments. We recommend that this exemption be targeted primarily towards not-for-profit developers (CHPs), and linked to the affordable housing being secured in perpetuity, not for a minimum of ten years.
<ul style="list-style-type: none"> ● Council to assess affordable housing needs and work with the housing and homelessness services to investigate ways to increase the delivery of affordable housing. Shelter NSW supports this initiative and suggests that the council undertake a homelessness survey to establish precise data on what the current unmet housing needs are across the LGA.

<ul style="list-style-type: none"> ● Council to work in partnership with CHPs and/or developers to directly deliver affordable housing on council-owned land. This initiative acknowledges the council’s role as a driver in the future delivery of affordable housing in regional NSW. However, Shelter NSW would encourage the council to work in partnership with the community housing sector and ensure that any affordable housing is delivered in perpetuity, not for a minimum of ten years.
<ul style="list-style-type: none"> ● Council to continue seizing opportunities and building on its current affordable housing schemes in Kootingal and Manilla. This proposed Action recognises that the council is already playing a key role in this space and that access to housing affordability is an issue within the LGA. Shelter NSW supports the initiative and feels that it should be explored as a core-planning tool in any new development precinct, especially those linked to essential infrastructures and new planning precincts.
<ul style="list-style-type: none"> ● Council to facilitate shop-top housing in Peel Street. Shelter NSW is of the view that this Action could be broadened so that diverse housing options could be considered in other precincts linked to essential services.
<ul style="list-style-type: none"> ● Council to review the DCP to improve the feasibility of affordable housing development. Shelter NSW broadly supports this Action, but we feel that some elements could be strengthened, possibly to include a mandated (rather than encouraged) proportion of one- and two-bedroom apartments.
<ul style="list-style-type: none"> ● Council to enter into partnerships with developers to secure affordable housing dwellings as part of new developments. Shelter NSW is of the view that Affordable Housing Contributions Schemes prepared under SEPP 70 are the most efficient way to deliver such products. However, we understand that sometimes, affordable housing contributions are often linked with a Planning Agreement policy framework. Shelter NSW recommends that the council add an action into its LSPS to investigate these tools as part of its Local Housing Strategy. We also recommend that the council set a target for affordable housing linked with new developments (or appropriate equivalent new floor space).
<ul style="list-style-type: none"> ● Council to support and improve services to low socio-economic members of the community and the homelessness. Shelter NSW would like to see this commitment strengthened by adding specific actions. For example, the council could consider carrying out a survey of the number of local residents experiencing homelessness, in collaboration with an outreach service, and commit to develop a formal Protocol for Homeless People in Public Places.
<ul style="list-style-type: none"> ● The Draft Planning documents include consideration of matters such as Aboriginal archaeological and heritage sites. Shelter NSW would like to see a commitment by Council to work with the Local Aboriginal Land Council on the development of a strategic plan for their landholders that support the delivery of additional housing opportunities.

Suggested Options to Increase Housing Choice and Affordability

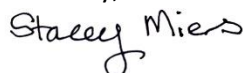
Listed below are several matters Shelter NSW would like Council to consider for inclusion in the final deliberation and implementation of its LSPS and future Housing Strategy.

1. **Including additional locations into the Tamworth Town Centre precinct plan that are specifically linked to expanding housing choice.** We feel that Tamworth LGA has several key precincts connected with essential services such as shopping centre facilities, educational and University facilities, co located critical medical facilities and transport infrastructure. For this reason, we suggest that the Council develop a broader precinct plan that goes beyond the current CBD to deliver additional housing opportunities linked to essential services.
2. **Consider supporting affordable housing development by providing 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.
3. **As part of Council DCP, a proportion of one- and two-bedroom apartments should be mandated in identified areas.** This could be linked to incentives.
4. **Adding an Action into the LSPS to investigate the use of additional planning tools as part of its LHS to deliver affordable housing.**
5. **As part of the LHS, the council should commit to investigating and identifying ways to support the local homeless population** and undertake a homelessness survey to establish clear data on the current unmet housing needs of the community.
6. **The council should commit to undertaking a workshop with local developers and builders on ways to deliver more diverse housing opportunities.**
7. **The council should consider implementing a single General Residential R1 zone across the whole LGA.** Shelter NSW believes this initiative has the potential to help increase the supply and diversity of dwellings within the LGA, which will have a positive effect on both choice and affordability. It would mean that as people's housing needs change over time they will have access to different housing options and would not be forced to move outside of their established social network as they grow older.
8. **That the council work with the local Aboriginal Land Council to develop a strategic plan** for their landholders that support the delivery of additional housing opportunities.

Thank you

Shelter NSW appreciates the opportunity to comment on Tamworth Regional Council's "Regional Blueprint 100" and its Draft Local Strategic Planning Statement 2020. We hope that the comments and insights provide a valuable contribution to the council's strategic planning work in the housing policy space. We are also happy to continue our engagement with Tamworth Regional 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@sheltersnsw.org.au.

Sincerely,



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Sincerely,



Chief Executive Officer Shelter NSW
John Engeler

