



DRAFT NEW ENGLAND NORTH WEST REGIONAL PLAN

Submission by the NSW Federation of Housing Associations

Community Housing and the role of the NSW Federation of Housing Associations

The NSW Federation of Housing Associations (the Federation) welcomes the opportunity to comment on the Draft New England North West Regional Plan.

The Federation is the peak industry body for community housing providers across NSW. Community housing providers are not-for-profit managers and developers of low cost housing. The Federation represents the interests of these organisations and provides support and resources for their further development.

Not-for-profit community housing organisations have been providing high quality rental housing for people on low to moderate incomes in New South Wales for over three decades.

Our NSW sector contains the largest, most accomplished, dynamic and professionally led community housing organisations in Australia. With over 38,000 tenancies, our 27 leading organisations manage more homes than Victoria and Queensland providers combined.

The Federation's Industry Strategy for Affordable Housing through the Planning System

In September 2015, the Federation released its Industry Strategy entitled 'Affordable Housing through the Planning System'. The Strategy focuses on planning and related urban policy matters. Its purpose is to identify and advocate for measures to improve the capacity of the planning system to support sustainable communities with access to appropriate and affordable housing, and to enable community housing providers to more actively and effectively utilise the planning system in delivering affordable housing.

As recognised by the Industry Strategy, the planning system alone cannot meet the needs of communities for an adequate supply of appropriate and affordable housing but, used in combination with other approaches, planning can facilitate affordable housing where the market alone is not meeting existing needs or protecting existing affordable housing.

Critical areas addressed in the Industry Strategy include the need for:

- Strong strategic planning for housing including the establishment of affordable housing supply targets at all levels;
- Support, tools and planning powers to enable local government to foster inclusive communities and address housing issues in their local areas;
- Targeted strategies in non-metropolitan areas to build on local strengths and address housing affordability and supply issues;

- Better utilisation of opportunities on government land;
- Financial feasibility assessment to ensure that planning controls and facilitation for affordable housing are set at appropriate and viable levels.

Attachment 1 provides an outline of the key elements of the Community Housing Industry Strategy. For the complete Industry Strategy please visit [here](#).

Planning and Housing in Regional Areas

The Community Housing Industry Strategy gives focused attention to regional areas where income levels are generally lower than in metropolitan areas and where access to affordable and appropriate housing is often impacted by limited variety in existing housing stock and less access to jobs, services and other opportunities. For these reasons, and also because land values are generally lower, strategies which are effective in metropolitan areas may be of limited usefulness in regional communities. Furthermore, slower growth rates, accompanied by slower or less certain capital growth in land values can, in turn, undermine market confidence in housing development and also result in more stringent lending practices by financial institutions.

The upside of this is that many regional areas are not under the same growth pressures, or limits to their expansion, as are the State's metropolitan areas. If these areas can prosper and attract new residents they can assist in alleviating the pressure on land supply and cost in metropolitan areas and provide a desirable lifestyle alternative for their existing and new residents. To this end, the Industry Strategy advocates the development and implementation of regional development strategies to foster viable local economies and, by doing so, provide options for people wishing to remain in their communities or to relocate to regional areas.

Thus, the Federation's Industry Strategy focuses on:

- Building local economies in non-metropolitan areas to:
 - Support local communities and enable local people to remain in their home communities;
 - Reduce growth pressure in metro areas and provide more affordable alternatives to city living.
- Responding to regional areas experiencing housing affordability and supply pressures.

Attachment 2 provides details of the Industry Strategy's approach to encouraging better outcomes in regional areas.

Draft New England North West Regional Plan

There is clear alignment between the Federation's Industry Strategy and the aim of the Draft New England North West Regional Plan to facilitate economic growth and social wellbeing. Appropriately, the Plan recognises that delivering more housing in sustainable locations will support a growing and ageing population and contribute to greater housing affordability. **The Federation supports the approach of the draft Regional Plan to build on local strengths to foster sustainable economies and communities.**

There are two other central planks of the Community Housing Industry Strategy that the Federation believes should also be implemented through the Regional Plan, they are the adoption of affordable housing supply targets and enabling planning authorities to utilise mechanisms to

promote and, where appropriate, require a range and diversity of housing types, sizes and price points to meet local needs.

Targets are of tremendous practical and symbolic significance in focusing attention on achieving desired outcomes. The Federation believes that affordable housing targets should be introduced to complement general housing supply targets for metropolitan and non-metropolitan areas. Ideally these should flow from state to regional level and on to sub regional and local levels. Targets should be informed by robust housing needs analysis and supported by requirements to report against their achievement at all levels.

General affordable housing supply targets should be complemented by more specific 'Affordable Housing Project' targets. 'Affordable Housing Projects' should be defined to ensure that effort is focused on housing that responds to regional and local affordable housing needs. This can be achieved by setting requirements for the profile of residents to be accommodated, housing cost and management.

The Federation would welcome the opportunity to work with the Department of Planning and Environment to assist in developing a framework for targets and for defining designated 'Affordable Housing Projects'.

A second key plank of the Industry Strategy is to provide for a range of measures/requirements to facilitate a diversity of housing types, sizes and price points to meet housing needs and to empower planning agencies at all levels to implement measures to facilitate and, where appropriate, require the provision of affordable housing. Currently the Environmental Planning and Assessment Act 1979 limits the ability of consent authorities to use planning mechanisms to require affordable housing. These limitations need to be revisited if the aim of the Regional Plan under Action 3.2.1 to enable Councils to require the inclusion of affordable housing is to be effective.

The Federation believes that a full range of planning mechanisms should be available to be utilised in response to regional and local conditions to encourage and require a range of housing, including appropriate provision of affordable housing.

Delivering the plan

Housing can support, or act as a catalyst to, a range of economic activities. It is well recognised that supply of appropriate and affordable housing is vital, not only to community well-being, but to ensuring that local businesses have access to a local workforce. A strong local community, in turn, supports the viability of local businesses.

In pursuing these outcomes, the Regional Plan proposes a Coordination and Monitoring Committee together with implementation mechanisms including regional collaboration across government, business stakeholders and the community. The Federation agrees that cross industry/community partnerships that harness and build on collective strengths will be vital to achieving required progress.

The Federation and its members operating in the Region would welcome the opportunity to be involved in the work of the Coordination and Monitoring Committee or other collaborative initiatives. This could include, for example, assisting the Committee in establishing the proposed framework for monitoring housing and other issues in the Region and in infrastructure planning.

Furthermore, community housing providers are well placed to work with local councils, non-government organisations and businesses to provide a diversity of housing to meet local and

regional needs (see Box 1: Case study). By necessity, their operations are flexible and efficient, making them attractive partners in joint initiatives.

GOAL 2 –A diversified economy through the management of mineral and energy resources including renewable energy generation

In addition to the general support for this Goal highlighted above, in relation to the specific directions set out under this Goal it is noted that under **Action 2.2.1** that the impacts of mining activity on housing are a key consideration. For example, an influx in temporary workers can create housing shortages thus driving up housing prices.

GOAL 3 - Communities resilient to change, with housing choice and services that meet shifting needs and lifestyles

The aims and directions set out under this Goal are strongly supported by the Federation. However, it would be useful to see the regional strategy referencing other NSW Government strategies to address issues to improve community outcomes. How does the regional strategy interact with FACS Future Directions and its goal to transfer 30,000 properties from the public to the community housing sector? Particularly in terms of the future of the public housing portfolio, place planning and services to strengthen support services. How will the needs of Aboriginal communities be met?

Set out below our comments in relation to some of the specific the Directions provided under this Goal.

In relation to **Direction 3.2 –Plan for housing to meet the needs of a growing and changing population** whilst the analysis provides an overview, there are a number of key aspects of housing needs and housing supply that should be highlighted:

- The ability of **very low income households** to access suitable affordable accommodation is often worse in regional areas where very limited supply of affordable rental housing is often combined with access difficulties and limitations in housing diversity. These households can effectively be **trapped in a regional area**, as they lack the resources or support to move elsewhere for better access to services, jobs and housing;
- More mobile lower income earners will often move out of the region where there is limited availability of affordable and appropriate housing. This can create flow on problems as a result of the **lack of a suitable workforce**;
- The Family and Community Services **Housing Market Snapshot for the New England North West Region** identifies that as at the 2011 Census **in every New England North West LGA low income households comprise the largest proportion of all households**. In addition, an increase in low income rental households in this region points to a growing demand for affordable housing.

Box 1: Case study: Community housing provider partnership with Armidale Regional Council

Homes North Community Housing and Armidale Regional Council recently signed a Memorandum of Understanding agreeing to work on an Affordable Housing Strategy for Armidale. The Council understands the importance of Affordable Housing to the health and development of the local economy and sees the Homes North Community Housing as a key partner to deliver an alternative housing product focussed on the needs of the community. The Affordable Housing Strategy also aims to include mechanisms that encourage the general supply of more affordable housing for Armidale.

- The Housing Market Snapshot identified a **growing gap between the supply and demand for appropriate housing for the community's needs, noting that for low income households there is a poor match between household types and bedroom numbers**. This is likely to worsen as a strong increase in lone person households is forecast for the region.

The Federation suggests that the Department should **conduct modelling to predict housing needs** in the Region into the future including both social and affordable housing numbers. This research would explore questions including:

- How many properties are needed to meet affordable housing demand across the Region over the next five to ten years?
- Which locations are these properties needed? What sizes should they be?
- Which segments of the population are in most need of affordable housing? In particular, the modelling should focus on a range of diverse groups including very low to moderate income earners, Indigenous households, students and young people, families, older and single person households.
- Is the current social housing of the right size, location and condition to meet future needs? Is there scope to utilise these properties in a different way to meet housing needs into the future? (for example by diversifying tenure, changing eligibility requirements).

In addition, the **guidelines proposed for local housing strategies** must ensure that sound housing needs analysis is undertaken including identification of the impacts and issues for very low, low and moderate income households, along with need for different sizes, forms and tenure of housing and support services.

Direction 3.3 Deliver housing choice to suit changing needs

This Direction explains that Council should plan for the mix of housing that suits the projected growth, changing demographics and market demand in their area. While the plan considers the need for affordable housing, a stronger emphasis is needed on the ways Councils can help improve affordable housing including through requirements for the inclusion of affordable housing in development. Broadening the capacity of local government to incorporate such responses is supported as discussed above. Note that mechanisms applied must be suitable for regional/local conditions. Project facilitation such as reductions in section 94 contributions and rate relief may be more effective in some regional locations than, say, inclusionary zoning.

In relation to this Direction, the Federation also supports:

- The **availability of bonuses** for provision of affordable housing, but notes that such mechanisms can be more limited in their effectiveness in lower land costs/lower density areas. The planning system should allow community housing providers to redevelop dilapidated properties on large blocks with larger number of units (where financially viable);
- Encouragement of **secondary dwellings - this flexible housing option** can allow older residents to live in a more suitable dwelling in the same location, help boost rental housing supply and enable better utilisation of social housing properties. This option could work well on property transferred from public to community housing (subject to financial feasibility and contractual arrangements. It is important that there is sufficient control over the use of such dwellings, particularly given the increasing prevalence such accommodation being used for 'airbnb' as discussed further below;

- Encouragement of **new caravan parks and manufactured home estates** which provide an important affordable housing option;
- Given the changing needs of the population (now and into the future) mechanisms should be implemented to **encourage the development of adaptable housing**. The widespread construction of large expensive homes is generally a problem in regional areas.
- The actions proposed for NSW government to prepare guidelines for local housing strategies (see above), work with Councils to prepare such strategies and to update their planning instruments to respond to their local housing strategies.

GOAL 4 – Prosperous urban centres with job opportunities

Under **Action 4.5.1**, it is important that the planning system provide sufficient viable land for tourist accommodation in order to limit the loss of regular residential accommodation to tourism. In this context, it is noted that growth in the popularity of ‘airbnb’ can be a significant factor in the loss of regular rental accommodation, particularly the smaller dwellings that are in much demand in the Region.

Access to land

Closely linked to community connectedness, is access to well located land for housing. Land can provide an important catalyst for housing development, particularly in areas where project viability is marginal or where growth pressures are significant. There is a strong case for government to use available surplus land holdings to initiate projects to address identified undersupply in housing. In appropriate locations, tenders for the sale of government land should include a requirement for a set and ambitious component of social and affordable housing to be incorporated in the development. Developers should be required to partner with a community housing provider to deliver these social and affordable housing targets.

Councils should also be encouraged to identify suitable land for affordable housing/mixed use projects. This could be on their own sites or where Council acts to broker a mixed-use project on private land. These kinds of opportunities for Council to play a role as broker are often prevalent in regional areas.

Continued involvement

In closing the Federation would like to reiterate its interest in working in partnership on cross sectoral initiatives in the Region and with the Coordination and Monitoring Committee on the development and implementation of the Regional Plan.

The Federation and its members would also be willing to provide input to the development of affordable housing targets and housing needs assessment methodologies, as well as in the preparation of guidelines for local housing strategies and the other areas highlighted in this response.

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