



Response to *City of Canada Bay*
*Draft Local Strategic Planning Statement & Draft Local
Housing Strategy*

Shelter NSW submission
July 2019

Introduction – and the context for Shelter NSW

Shelter NSW has been operating since 1975 as the state’s peak housing policy and advocacy body. Our vision is “A secure home for all”. We pursue our vision through critical engagement with policy and practice and thought leadership. We provide systemic advocacy and advice on policy and legislation for the whole NSW housing system to resolve housing inequality and we seek to ensure that the voices of housing consumers are included in our policy responses and review.

Our approach involves engaging, collaborating and connecting with Government, the private and not for profit sectors, stakeholders and consumers. Our research centres on the causes of inequity and injustice in the housing system and we advocate solutions that aim to make the housing system work towards delivering a fairer housing system for all.

Shelter NSW is concerned about the housing crisis in NSW and the rising trends in homelessness, housing rental stress as well as the impacts of poor- quality housing, particularly on low income households¹. Over three quarters of lower income renters in NSW are paying unaffordable rents (92% of very low- income renters in Sydney). Lower cost properties are being steadily replaced with new ones at higher rents, and new concentrations of disadvantage have been created across our major cities as low income households are displaced. The NSW rental market is failing, forcing our most vulnerable citizens to go without essentials and are being excluded from jobs and opportunities.

Shelter NSW priorities are [centred on four core areas](#)², all of which are relevant to the Local Strategic Planning Statements and Local Housing Strategies:

- **Building enough low-cost rental housing to meet current and future need** – and recognition that social and affordable housing are critical social and economic infrastructure;

¹ See Shelter NSW 2019 Election Platform
<https://www.sheltersnsw.org.au/uploads/1/2/1/3/121320015/sheltersnsw-2019-election-platform.pdf>

- **Making housing fair for all** – so that people with specific housing needs such as accessibility or adaptability needs have fair access to housing;
- **Giving renters secure homes** - so that they have security of tenure and can put down their roots in a community without fear of unfair evictions; and
- **Making sure low-income households aren't excluded in the redevelopment of Sydney and regional centres.**

Shelter NSW is pleased to provide comment on the City of Canada Bay's draft Local Strategic Planning Statement (LSPS). This submission also includes consideration of and reference to the draft Local Housing Strategy (LHS) prepared by the City of Canada Bay as well as the *Canada Bay Housing Background Report* prepared for the City of Canada Bay by SGS Economics & Planning – Independent Insight.

The broader context

It is important to consider the issue of housing affordability in the context of the Greater Metropolitan Region, and the urban planning system that operates across New South Wales. There is currently considerable public interest in the policies and instruments that can be used to generate more affordable housing through the planning system, which is pertinent to the work of councils as local planning authorities. This has been captured in the Greater Sydney Commission's (GSC) Region and District Plans, which recommend the introduction of Affordable Rental Housing Targets in areas to be defined by councils and in planned precincts. The NSW Department of Planning, Industry and Environment (DPIE) identifies housing affordability as a key principle for consideration in the development of councils' local housing strategies. DPIE has also recently amended the State Environmental Planning Policy No 70 (SEPP70) – Affordable Housing (Revised Schemes) to make all councils in New South Wales eligible to consider using the inclusionary zoning provisions available in the Environmental Planning and Assessment Act 1979, and published a *Guideline for Developing an Affordable Housing Contribution Scheme*.

This is all occurring amidst a growing and changing population dynamic that is applying new pressures to our existing urban communities. Sydney is no longer just growing outwards, pushing its rural/urban fringe further from the city's main centres. It is consolidating and developing new urban centres closer to the fringe and large tracts of already developed land that are well within the city's inner and middle suburban rings are earmarked for or undergoing renewal at increasing levels of density. As communities and neighbourhoods are reformed at higher densities by market driven developers, the likelihood of low-cost housing in the private rental market being displaced is increased, resulting in more lower income households looking for affordable housing in outer suburban areas. Increasing rents and property prices create displacement of essential and key workers on low and moderate incomes, unable to find affordable housing in inner areas such as the City of Canada Bay LGA. It also increases the number of residents in housing stress, 42% for rental households according to the LSPS, and for many who have called this area their home are compelled to relocate out of the area in search of affordable

housing. This also has an impact on quality of life, connection to the community, increased travel time and additional expenses for those workers who have long commutes to and from the area.

Locally prepared and implemented planning strategies that aim to address housing affordability challenges will help mitigate some of these negative impacts, provided they are sufficiently ambitious and properly resourced. But the context in which urban change is currently occurring means concentrating on local strategies is only one part of managing a response. Advocating the need for affordable housing strategies to neighbouring and nearby councils, especially those where major urban redevelopment will occur will also be necessary. In the absence of proper city-wide or state-wide strategies, more councils implementing local affordable housing strategies will make it easier for councils in Sydney metropolitan region to manage the impacts of population growth, development and urban renewal on their own communities, even while that renewal may be happening elsewhere.

Taking the need for Housing Affordability into account in the LSPS

Shelter NSW congratulates the City of Canada Bay on the preparation of a comprehensive and evidence based draft LSPS which outlines a high level “*20 year vision for land use in the area, the special character and values that are to be preserved and how change will be managed in the future*”, as required by section 3.9 of the Environment Planning and Assessment Act 1979. Producing an LSPS is critical to the development of a council’s Local Housing Strategy and revision of Local Environmental Plans (LEPs), which are actions required by the GSC Regional and District Plans.

Shelter NSW’s position is that a “one-size-fits-all” approach will be of little value when it comes to local councils’ capacity to deliver (or facilitate the delivery of) new Affordable Housing across Sydney and New South Wales. We understand the need for variation across different areas to suit the broad range of local conditions. However, we have developed some [principles we would like to see applied](#) in all LSPSs³. Our analysis and comments on the City of Canada Bay draft LSPS and LHS are underpinned by the following principles:

1. The LSPS recognises and quantifies local need for housing that is affordable to those on the lowest 40% of incomes

The LSPS should recognise that housing affordability is an issue within the area. It should include some high level measures of this need such as the proportion of households in the area who are in housing stress, and/or the proportion of very low and low income households in the area. The LSPS should commit to further quantifying and measuring the need for affordable housing within the LGA as a component of a LHS.

2. The LSPS commits to developing a Local Housing Strategy

The LSPS should commit to developing a comprehensive LHS based on current housing growth, housing demand and growth trends. The LSPS should make clear that the LHS will identify and prioritise areas for

³ See <https://www.shelternsw.org.au/blog/exhibition-of-draft-local-strategic-planning-statements>

growth. The LSPS should also state that the LHS will integrate principles related to affordable housing, including potentially a Local Affordable Housing Strategy and/or specific Affordable Housing programs.

3. The LSPS commits to addressing housing affordability, including through a local strategy and/or programs for growth in dwellings that are affordable to those on the lowest incomes, ideally through Affordable Housing products.

Given the need identified in #1, the LSPS should recognise that increasing the amount of affordable dwellings in the area is a key component of liveability and a strategic priority in the context of the LSPS. The LSPS should commit to locally appropriate strategies for growing the number of dwellings that are affordable to people on very low to moderate incomes. This can include planning mechanisms that encourage housing diversity, but shouldn't be limited to them as they are unlikely to address the affordable housing need without further targeted intervention (see principle #4).

Ideally these strategies should identify opportunities for delivery of affordable housing dwellings in the area, financed through planning mechanisms such as

- SEPP 70/Affordable Housing Contribution Schemes

- Voluntary Planning Agreements

- Section 7.11 contributions

A commitment to seeking approval for SEPP 70 schemes is strongly desirable.

A commitment to other value capture mechanisms that allow for delivery of affordable housing through rezoning is also strongly desirable, however, might not be practical for all local government areas due to differences in rezoning potential.

4. The LSPS commits to housing diversity

The LSPS should commit to the promotion or facilitation of housing diversity through local planning controls and initiatives. This ensures housing supply is diverse, and provides housing choice to diverse community members. This may have an effect on housing affordability, but shouldn't be the only strategy included in the LSPS to address housing affordability issues. Indeed, it is extremely difficult to assess whether promotion of housing diversity through local planning controls and initiatives will affect private market affordability. It is also extremely unlikely to improve housing affordability for very low and low income households.

The LSPS should also commit to new residential development that caters to households with specific accessibility and adaptability needs.

5. The LSPS commits to social diversity

The LSPS should recognise that culturally and socially diverse communities are inclusive, healthy and creative. This precludes any LSPS, and additional strategic planning identified for development in the

LHS, from concentrating growth in affordable housing stock in specific parts or precincts within the LGA. Ideally this means a percentage of all new residential development should be dedicated to affordable housing, preferably delivered on site, to ensure social mix.

6. The LSPS recommends further advocacy from local government for social and affordable housing

The LSPS should recognise that housing affordability is a complex issue that needs to be tackled by all levels of government. The LSPS should recommend further advocacy by Council to the NSW and Australian Governments for more social and affordable housing to be developed in the local area, to be funded by mechanisms outside of the planning system such as state and federal budgets.

This might also include recommendations for Council to tackle housing affordability issues at the metropolitan and regional level, for example through collaboration with other LGAs, to advocate for development of a Regional Affordable Housing Strategy to operate across council borders.

Analysis

As an attractive city located in the Inner West, close to employment centres and within 6 kilometres of Sydney Central Business District (CBD) – a metropolis well known for its housing affordability issues – housing in City of Canada Bay LGA is expensive, similarly to other inner-city suburbs but with a median rent significantly higher than in Greater Sydney (e.g. median weekly rent \$610 as compared to \$447 average in Greater Sydney⁴). Affordable housing is out of reach for very-low, low and many moderate income households in the LGA. Recent increases in median rent and average dwelling price shows a deterioration of affordability for such households across the existing housing stock in the area. The Draft LSPS recognises this and highlights housing affordability issues in the area, with 42% of rental households in housing stress, as outlined in Figure 3: *Canada Bay Snapshot* p15. Whilst the City of Canada Bay is a relatively affluent area, with a SEIFA Index of Relative Socio-Economic Disadvantage of 1068⁵, the Draft LSPS recognises that there is a significant number of very low income households in the area, in particular in the areas of Rhodes, Abbotsford/Wareemba, Canada Bay/Five Dock and Strathfield Triangle where “more than 13.9% of households are low-income households (<\$650 a week)”⁶. Shelter NSW is pleased to see that the City of Canada Bay recognises the significant need for more housing that is affordable to people on very low and low to moderate incomes in the area. In particular, the recognition of the need for affordable housing in Priority 5 on page 32: “*Housing affordability is a key issue in the city. In 2016, 42% of households renting in the LGA experienced rental stress*”.

We also appreciate the recognition on page 29 that “*The City’s growing population will create demand for additional dwellings and Council’s draft Housing Strategy has identified a need for affordable housing and a diversity of housing types*”. Shelter NSW supports the commitment by Council (page 29) to

⁴ See Rent and Sales Report for March 2019 Quarter, FACS: <https://www.facs.nsw.gov.au/download?file=664499>

⁵ See Profile ID <https://profile.id.com.au/canada-bay/seifa-disadvantage>

⁶ See City of Canada Bay LSPS, Map 4: Social Context, page 12.

“maintaining Canada Bay’s liveability, ensuring that residents have access to quality social infrastructure, safe and inclusive places, and affordable and diverse housing.”

The demand for social housing in the area is high and waiting times are very long. As of 30 June 2019, there were 1227 general and 247 priority applicants (households, not only individuals) on the NSW Housing register for CS07 Inner West FACS allocation zone, which most suburbs within the City of Canada Bay belong to, with expected waiting times of 5 to 10 years for studios/1 bedroom properties and 10+ year for all other type of properties.

Current trends indicate that housing affordability will continue to decline in the area – as it will in all areas that are reasonably accessible to employment and services throughout the Sydney basin – as long as metropolitan and state-wide social and affordable housing strategies and related policies are not developed or adopted. [Shelter NSW Election Platform 2019 document](#) provides further detail on the policies and reforms across the system that we believe are required to address the housing affordability crisis in NSW.

We note that given 42% of renting households in the LGA are in rental stress, Council alone cannot address the important demand for social housing and affordable housing, which will be 14% of the population of the LGA as stated in Figure 3: *Canada Bay Snapshot* p15. Reforms of the private rental market and other housing policies, involving actions from all levels of government will be needed to end housing stress and homelessness.

Consideration of the Housing Affordability need in the draft Local Housing Strategy (LHS)

Shelter NSW congratulates the City of Canada Bay for preparing a draft LHS that identifies many of the issues and impacts of the lack of affordable housing, and which strongly takes into account the need for affordable housing across the LGA. In particular we note the following statements:

- Key finding 2F, page 7 of Draft LHS: *“Housing in this LGA (and more broadly across metropolitan Sydney) is becoming less affordable, particularly for young families moving into larger dwellings with more than two bedrooms”*
- Page 8, 3. Multi Criteria Assessment Framework: *“There are certain sections of the community (key workers, low income households, etc.) which need additional support.”*
- Background report, section 6.1, page 78: *“Rental prices across the Canada Bay LGA area are unaffordable for a household on the average income for the LGA”*
- We note that in Background report, section 7.1, Key issues and opportunities, page 86, Council has identified the different cohorts of residents affected by rental stress, some of whom are in severe rental stress. The report also notes that there is a lack of diversity to meet different housing needs and that this is having an impact on housing affordability.

We also note that Table 23 on page 78 reveals significant levels of mortgage stress, at 21.2% average across the LGA. This could have an impact on tenure distribution and the local private rental market

should these households have to sell or foreclose. Further evidence based analysis about the potential for some of these households to end up with a foreclosure or experience homelessness would be useful to evaluate possible adverse impacts and what could be done.

Shelter NSW recommends that the language around need for affordable housing is strengthened to recognise that housing is increasingly unaffordable across all types of dwellings and in particular for very low, low and moderate income households regardless of the composition of the household.

Commitment of the LSPS to housing diversity

Shelter NSW strongly supports Planning Priority 5 of the draft LSPS “Provide housing supply, choice and affordability in key locations”. In particular we support actions 5.3 and 5.6, exploring changes to the planning framework to encourage a greater diversity of dwellings. This aims to ensure housing supply is diverse, and provides housing choice to diverse community members. Whilst this may have an effect on housing affordability, the draft LSPS also includes a range of additional and specific strategies to address housing affordability issues. These are discussed further in the next section.

We have concerns, about the following:

- Action 5.2 could have unintended outcomes regarding development necessary to achieve dwelling targets across the LGA. While the intention to preserve local character is laudable, further explanation could be provided as to why renewal areas have been identified. The way local character will be preserved, and the rationale for this seemingly rigid approach could be explained further in the LSPS.
- Actions 5.3 and 5.6 relate to a small number of areas of the LGA, as does action 5.5 (discussed further in the next section). This is a cause of concern as development should be distributed across the LGA, and could potentially prevent Council from delivering medium density, also referred to as the missing middle, in areas with potential for infill. While the LHS addresses some of these issues, we recommend amending the restriction to certain areas for actions 5.3 and 5.6 and broadening their scope.
- Action 7.4, “Preclude Complying Development under the Housing Code and Low Rise Medium Density Housing Code from Local Character Areas”. While some complying medium density development under the code might not achieve satisfactory outcomes, there is room for an application of the Housing Code that respects local character, and design priorities outlined by the LHS and LSPS while delivering more housing diversity and supply. We recommend that this action is detailed further to elaborate on how Council will still deliver more housing growth and housing diversity in low rise medium density areas including local character areas.
- Action 7.8 regarding minimum lot size for Boarding Houses in R2 zones. Considering that the ARH SEPP 2009 Part 2, Division 3, Clause 30AA states that a boarding house cannot be granted development consent unless it is satisfied that the boarding house has no more than 12 boarding rooms, we are concerned that mandating a minimum lot size of 800 square meters for boarding houses in R2 in City of Canada Bay LEP would limit financial viability of boarding houses in these areas. Boarding houses provide much needed housing that is affordable for people on

very low and low incomes, as well as to students in recent times through New Generation Boarding Houses, and contribute to housing and social diversity. Shelter NSW would like to see further explanation of the intended effects of this action, given our concerns that it could prevent development of boarding houses by impacting financial viability of housing developed under ARH SEPP.

Shelter NSW supports Planning Priority 4.1 of the LSPS, to “review the Canada Bay Development Control Plan to ensure that a proportion of all new apartment development is adaptable and accessible”. Given the ageing population and the growing need for adaptable, accessible and diverse housing Shelter NSW recommends this Priority is strengthened by stating the following, using reference to the levels of the Liveable Housing Design Guidelines (LHGD) from Liveable Housing Australia⁷:

- That all new apartment development achieves the silver level of the LHGD, allowing ‘visitability’ of dwellings for people with mobility issues
- That a proportion of all new apartment development achieves the gold or platinum level of the LHGD
- That a proportion of all new development in the LGA, including low and medium density housing, achieves the silver level of the LHGD, allowing ‘visitability’ of dwellings for people with mobility issues

Accessibility of public space and universal, inclusive design are of primary importance to create healthy, inclusive communities. Shelter NSW notes Council’s commitment to “provide high quality planning and urban design outcomes for key sites and precincts.” in Planning Priority 6 and to “Deliver high quality open space and recreation facilities” in Planning Priority 17. It is important to elaborate on these priorities, to ensure that the community is clear on what is meant by “high quality....design outcomes”, for example to be explicit by including specific reference to accessibility or universal design. We therefore suggest inclusion of explicit actions and outcomes indicators in either of these Priorities which stipulate the built environment and amenity in the LGA will be designed to be accessible to all members of the community. These actions could refer to the Seven Principles of Universal Design⁸ being included in the DCP or in the relevant infrastructure strategies, for example.

Commitment of the LSPS to address housing affordability

Shelter NSW strongly supports Priority 5 on page 32 of the draft LSPS indicating that one of the priorities of Council is to “provide housing supply, choice and affordability in key locations”. We have concerns, however, that the draft LSPS does not adequately provide for social diversity and equity by restricting the affordable housing delivery to certain areas of the LGA, and by containing strong provisions to restrict development to certain parts of the LGA only. While it is sensible to maintain diversity of housing and character throughout the area, it is also important to make sure that affordable housing is delivered for all the communities and neighbourhoods that make up the City of Canada Bay.

⁷ See <http://www.livablehousingaustralia.org.au/95/downloads.aspx>

⁸ See Centre for Excellence in Universal Design, <http://universaldesign.ie/What-is-Universal-Design/The-7-Principles/>

We also support the actions listed in the LHS, in particular action 5 on page 17 of the LHS:

- a commitment to develop affordable housing schemes under SEPP 70
- a minimum 5% target of new floor space to be provided as affordable housing
- a commitment to work in partnership with CHPs to identify opportunities for more affordable housing provision
- A commitment to work with and advocate to Government for more social housing and increase the provision of social housing in the area over time.

On the specific question of seeking approval for SEPP 70 / Affordable Housing Contribution Schemes Shelter NSW understands the housing diversity approach places a strong reliance on rezoning and up-zoning areas for higher density residential development, leading to significant uplift in land values in the areas identified for prospective development or redevelopment. This creates opportunities for communities to share in some of the increased value and can be used to fund new infrastructure and community facilities, and this is facilitated by provisions in the Environmental Planning and Assessment Act 1979. We note the growing recognition at the State Government level for this to include funding for new affordable housing, as is reflected in the recent extension of SEPP 70 to allow all councils across New South Wales to adopt Affordable Housing Contribution Schemes.

Such schemes are already in operation in the City of Sydney local government area. Similar schemes are also in development in the Cities of Willoughby and Randwick, as well as the Inner West Council, for example. These schemes require developers who wish to operate within certain defined precincts, as approved and included in a revised Local Environmental Plan, to make a contribution to a Council's affordable housing program as a condition of development consent.

Importantly, where there is certainty around the requirement for developer contributions, the apparent extra costs to developers are capitalised into the price they pay for developable land. This means developers' viability considerations are not unduly impacted by the need to provide affordable housing contributions, allowing councils to fund and develop their own portfolios of targeted affordable housing through the uplift in value created by rezoning land for higher density use.

Finally, Shelter NSW draws the City of Canada Bay attention to the *Strengthening Economic Cases for Housing Policies* report, led by CHIA NSW and UNSW City Futures, and to which Shelter NSW partnered and co-funded. This research models the significant economic and productivity gains that could be expected from a large scale program of Government investment in housing that is both well located and affordable. While it is not within the scope of a local government authority to develop a program on the scale that has been modelled, the results of this research should give Councils greater confidence that Affordable Housing Contribution Schemes, designed to fund a local affordable housing program will have discernibly positive economic impacts at the local level, which will not only benefit the affordable housing residents but the broader community and the local economy. Shelter NSW strongly advocates that affordable housing should be seen as critical social and economic infrastructure rather than seen as a "welfare" policy response. In this vein we would suggest that decision makers including Councils

should harness this thinking in their policy and planning, as well as in the messaging to local communities so that the benefits of affordable housing are promoted and better understood.

We provide the following comment and recommendations:

1. Include explicitly affordable housing as social and economic infrastructure in the LSPS, for example in action 1.3 of Planning Priority 1.
2. Amend the action committing to develop affordable housing schemes under SEPP 70 in the LHS to allow for potential application to the whole LGA and not only major redevelopments and high density developments
3. Amend Action 5.5 of the LSPS to include the whole LGA. There are equity and social diversity issues associated with restricting this value capture mechanism to certain precincts. We are concerned that this mechanism would concentrate affordable housing in certain areas such as the ones identified for large scale renewal on page 14/15 (Rhodes and the Northern Line). There is also a risk that this will have unintended effects on land value and development activity across the LGA.
4. Increase the affordable rental housing target as a percentage of new dwelling floor space in the LHS and in Action 5.5 of the LSPS. Shelter NSW recommends between 10-15% depending on financial feasibility. This is particularly important given the scale of the need and considering that the background report of the LHS itself recognises page 84 that “a target in the order of 5% for affordable rental housing as part of new development alone will not necessarily fill this gap”. We also note that the Background Report has already identified specific areas where it would be appropriate to accommodate a higher rate than 5% for affordable housing, for example in Rhodes East for key workers given the proximity to Concord hospital.
5. Include explicitly in the LSPS and/or the LHS that Council will consider other value capture and planning mechanisms that allow for delivery of affordable housing such as Voluntary Planning Agreements and section 7.11 contributions. This could be done in Action 1.1 of Priority 1.

Commitment of the LSPS to social diversity

Whilst the draft LSPS includes explicit commitment to social diversity, committing to foster safe, healthy, creative, culturally rich and socially connected communities, we suggest amending Priority 5 as mentioned previously to include a percentage of all new residential development that should be dedicated to affordable housing. We recommend for this to be preferably delivered on site to ensure social mix. Social diversity should be encouraged not only in areas with a high proportion of social housing stock, but also in other areas through implementation of inclusionary zoning mechanisms.

Commitment of the LSPS to further advocacy from local government for social and affordable housing

Shelter NSW is pleased to see that the draft LSPS of the City of Canada Bay recognises that housing affordability is a complex issue that needs to be tackled by all levels of government. The LSPS could recommend further advocacy by Council to the NSW and Australian Governments for more social and

affordable housing to be developed in the local area, to be funded by mechanisms including those outside of the planning system, such as those outlined in Shelter NSW, National Shelter or CHIA policy and platform documents.

Shelter NSW strongly supports the statement in the LHS that Council will work in partnership with CHPs to manage affordable housing supply and to seek government grants and subsidies for additional provision. We also support the commitment to work with NSW Government and the Land & Housing Corporation to review current social housing provision and collaborate for the renewal of housing in the LGA. We would like to see the language of this statement strengthened, however, to state clearly that Council will advocate to State Government for increased provision of social housing within the LGA.

Shelter NSW' position is that partnering across all three levels of Government, as well as the not for profit and private sectors is vital to achieving sustainable social and economic outcomes for residents.

It is important to recognise that we need to tackle housing affordability issues at the metropolitan and regional level. Advocacy from local government to state and federal governments for direct investment in social and affordable housing would assist local government and the planning system and recognises the need for a systemic response to addressing a public policy issue that is the responsibility of all levels of Government.

Concerning housing affordability, we recommend that the LSPS includes recommendations for Council to tackle housing affordability issues at both the metropolitan and regional level, for example through collaboration with other LGAs, to advocate for development of a Regional Affordable Housing Strategy to operate across council borders. This could be included as an additional Priority within the first theme, "Infrastructure and Collaboration".

Implementation, Monitoring and Reporting

Shelter NSW strongly supports the commitment of Council to work to ensure the on-going alignment of the LSPS with Council's overarching community strategic planning, as well as the commitment to review the LSPS regularly.

We are concerned, however, that the LSPS 'Monitoring & Action Plan' Table 1 does not include any specific indicators to measure success regarding better housing affordability in the area. This is especially important given the need identified by Council in the LSPS. We recommend the inclusion in the monitoring table of performance indicators specific to housing affordability such as:

- Decrease in proportion of residents of the LGA in housing stress
- Decrease in unmet affordable housing need
- Increase in proportion/number of dwellings in the area that are affordable to people on low to moderate incomes

Summary of Recommendations

1. Strengthen the language around need for affordable housing to recognise that housing is increasingly unaffordable across all types of dwellings and in particular for very low, low and moderate income households regardless of the composition of the household.
2. Explain the intended effects of action 5.2 further in the strategy
3. Broaden the scope of actions 5.3, 5.5 and 5.6 so they apply to the whole LGA unless there are exceptional circumstances
4. Detail action 7.4 further and include a strategy that demonstrates Council will still facilitate delivery of medium density infill while preserving local character of medium density low rise areas
5. Detail the intended effects of action 7.8 and ensures it does not lead to a decrease in housing stock that is affordable to people on very low income and does not prevent the feasibility of boarding houses in R2 zoning
6. Strengthen Priority 4.1 by including the following
 - That all new apartment development achieves the silver level of the LHDG, allowing 'visitability' of dwellings for people with mobility issues
 - That a proportion of all new apartment development achieves the gold or platinum level of the LHDG
 - That a proportion of all new development in the LGA, including low and medium density housing, achieves the silver level of the LHDG, allowing 'visitability' of dwellings for people with mobility issues
7. Include a reference to the universal design and accessibility in Priorities 6 and 17
8. Include explicitly affordable housing as social and economic infrastructure in the LSPS, for example in action 1.3 of Planning Priority 1.
9. Amend the action committing to develop affordable housing schemes under SEPP 70 in the LHS to allow for potential application to the whole LGA and not only major redevelopments and high density developments
10. Amend Action 5.5 of the LSPS to include the whole LGA.
11. Increase the affordable rental housing target as a percentage of new dwelling floor space in the LHS and in Action 5.5 of the LSPS. Shelter NSW recommends between 10-15% depending on financial feasibility.
12. Include explicitly in the LSPS and/or the LHS that Council will consider other value capture and planning mechanisms that allow for delivery of affordable housing such as Voluntary Planning Agreements and section 7.11 contributions. This could be done in Action 1.1 of Priority 1.
13. Include in Priority 5 that affordable housing delivered as part of the value capture mechanism is to be delivered on site to ensure social diversity, unless exceptional circumstances
14. Strengthen language in action 5, page 17 of the LHS to state clearly that Council will advocate to State Government for increased provision of social housing within the LGA
15. Include recommendations in the LSPS for Council to tackle housing affordability issues at both the metropolitan and regional level by collaborating with other local government bodies and

advocate for development of a Regional Affordable Housing Strategy to operate across council borders.

Further discussion

Thank you for the opportunity to take part in the formulation of City of Canada Bay Local Strategic Planning Statement and Local Housing Strategy. Shelter NSW, as a housing policy and advocacy peak is keen to continue to work with and support Council on the further development of the LSPS and the LHS.

Please do not hesitate to contact Thomas Chailloux on (02) 9267 5733 or thomas@shelternsw.org.au in the first instance if you wish to discuss these comments.

Yours sincerely



Karen Walsh
Chief Executive Officer
Shelter NSW