



Response to *Burwood Council* *Draft Local Strategic Planning Statement*

Shelter NSW submission
September 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 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 Burwood Council's draft Local Strategic Planning Statement (LSPS).

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 Burwood LGA. It also increases the number of residents in housing stress, 33.4% for rental households according to Profile.id based on ABS data³, significantly higher than the average in Greater Sydney at 26.4%. Due to this, 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.

³ Australian Bureau of Statistics, Census of Population and Housing 2016. Compiled and presented in atlas.id by .id <https://atlas.id.com.au/burwood/maps/rental-stress>

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 Burwood Council on the preparation of a 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 (LHS) 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 LSPSs⁴. Our analysis and comments on the Burwood Council draft LSPS is 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 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.

⁴ See <https://www.shelternsw.org.au/blog/exhibition-of-draft-local-strategic-planning-statements>

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.

Taking the need for Housing Affordability into account in the LSPS

As an attractive LGA located in the Inner West, close to employment centres and within 11 kilometres of Sydney Central Business District (CBD) – a metropolis well known for its housing affordability issues – housing in Burwood 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 \$570 as compared to \$447 average in Greater Sydney⁵). 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 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 Burwood LGA 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.

Shelter NSW is pleased to see that Burwood Council recognises the need to address housing affordability issues in the area. In particular, we support the vision outlined (page 11) that “a diversity of housing types and affordability provides better housing choice” and the message from the Mayor, Cr John Faker, committing to deliver more homes and offer “a range of housing options” (page 5).

While a Local Strategic Planning Statement is a high level strategic planning document, we believe that the evidence outlined in the LSPS could be further developed to strengthen the evidence base to inform actions. For example, ‘A Snapshot of Burwood’ (Figure 4 on page 17) does not include information that is essential to assessing affordable housing need such as the proportion of total and lower income households in housing stress, rental stress and mortgage stress, median rent and median income, median prices of detached and attached dwellings, current affordable housing stock and social housing stock, etc. We would suggest that such evidence is included and analysed as part of the Local Housing Strategy that will be prepared by Burwood Council. We recommend that the most important findings are integrated into the final LSPS adopted by Council or retrospectively. This will allow a stronger evidence base for actions, ensure the need is appropriately assessed and responded to as part of the reviews of the LEP and the DCP, and provide baseline data for performance monitoring.

⁵ See Rent and Sales Report for March 2019 Quarter, FACS: <https://www.facs.nsw.gov.au/download?file=664499>

Shelter NSW would also recommend that the commentary is strengthened throughout the LSPS and in the Liveability Section (Planning Priorities 3,4,5) to recognise the need for housing that is affordable to people on very low to moderate income, including specific affordable housing dwellings, rather than a broad commitment to addressing affordability through housing diversity and housing choice strategies. Although median dwelling price may be lower for attached dwellings or lower floor space dwellings than for large detached dwellings, it is unlikely that lower paid workers will be able to enter home ownership or find affordable rents simply because there are additional smaller dwellings on the market. Given that health and social services (3,285 local jobs) and retail (2,801 local jobs) are some of the largest employers in Burwood LGA, it is likely there are many lower paid workers with a need for specific affordable housing in the area.

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 33.4% of renting households in the LGA are in rental stress⁶, Council alone cannot address the important demand for social housing and affordable housing. 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.

Commitment of the LSPS to developing a Local Housing Strategy (LHS)

For the reasons outlined above, we particularly support the following elements of Burwood Council LSPS:

1. Planning Priority 3, Action 3.1 on page 34 indicating that council will be developing a comprehensive Local Housing Strategy (LHS) for the LGA to address the delivery of 5 year, 6 to 10 year housing supply targets for the LGA and assess capacity to contribute to the 20 year strategic housing target for the Eastern City District.
2. Planning Priority 3, Action 3.2 on page 35 to “deliver housing supply with the aim of meeting housing targets of 2,600 new homes in 2016-2021” and to deliver additional dwellings in the following period if the targets are not met.

Shelter NSW recommends that the LHS for Burwood LGA includes targets for housing that is affordable to people on very low to moderate incomes, either through specific Affordable Rental Housing targets, or through targets for social and affordable housing stock as a proportion of the total stock.

⁶ Australian Bureau of Statistics, Census of Population and Housing 2016. Compiled and presented in atlas.id by .id <https://atlas.id.com.au/burwood/maps/rental-stress>

Commitment of the LSPS to housing diversity

Shelter NSW strongly supports Planning Priority 3 of the draft LSPS to “Provide housing supply, choice and affordability in close proximity to jobs, services and public transport”. In particular we support exploring changes to the planning framework to encourage a greater diversity of dwellings, such as more medium sized dwellings to fill the gap between high density apartments and larger family homes as mentioned in the LSPS (page 34). This aims to ensure housing supply is diverse, and provides housing choice to diverse community members. Whilst this may have a limited effect on housing affordability, the LSPS should also include a range of additional and specific strategies to address housing affordability issues. We discuss the difference between providing more housing choice and addressing affordability further in the next section.

We recommend the inclusion of more specific actions in the LSPS to ensure greater housing diversity, although this could also be done at a later stage in the LHS:

- Define more precisely ‘medium sized homes’ and mandate for a proportion of new development to be a certain number of bedrooms, based on the need identified in background local housing need studies

Shelter NSW supports the recognition made in Burwood LSPS (page 35) that there is a “need to plan for more universal housing”. 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 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

Accessibility of public space and universal, inclusive design are of primary importance to create healthy, inclusive communities. Shelter NSW notes Burwood Council’s commitment in Planning Priority 4 to “provide high quality planning and urban design outcomes for key sites and precincts.” as well as Planning Priority 10 to “Deliver high quality open space and recreation facilities”. We 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.

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

These actions could refer to the Seven Principles of Universal Design⁸ being included in the DCP or in the relevant strategies, for example.

Commitment of the LSPS to addressing housing affordability

Shelter NSW strongly supports Planning Priority 3 to “provide housing supply, choice and affordability”. We commend the recognition by Council (page 35) that many key workers on lower income such as teachers and emergency workers face housing stress and that there is a need for “more affordable housing options” so “households on low incomes can afford to stay in the LGA”. As mentioned earlier, providing local data in the LSPS to measure and assess this housing stress would be useful.

We provide the following comment and recommendations about addressing housing affordability issues in the LGA, although Shelter NSW understands that it might be more appropriate for some of these to be integrated in the LHS rather than in the LSPS.

Social and affordable housing is increasingly being recognised as essential social and economic infrastructure, both by experts, practitioners and government agencies. The [Australian Infrastructure Audit 2019](#) recently released by Infrastructure Australia listed housing as infrastructure for the first time. This is justified by the essential character of housing to support healthy, inclusive, productive communities and the numerous productivity and social benefits it brings. Burwood LSPS already recognises page 25 that “a range of major infrastructure is required to meet the needs of Burwood community”. Recognising social and affordable housing explicitly as infrastructure will facilitate advocacy to other levels of government for more social and affordable housing, and give Council flexibility in the future in how it finances delivery of more affordable housing through planning mechanisms.

Shelter NSW recommends that:

- Affordable housing is explicitly recognised as social and economic infrastructure in the LSPS, for example in Planning Priority 1 or 2.
- Council commit in LSPS/LHS to investigate exemptions from section 7.11/7.12 contributions for Community Housing Providers (CHP) given that they are delivering essential infrastructure under the form of social and affordable housing.

Regarding the potential impacts of housing diversity strategies on housing affordability, we provide the following comment.

We fully support the principle of housing diversity and acknowledge the importance of a range of housing typologies being planned for and delivered across various localities, at increasing levels of density where appropriate. However, such an approach alone will not deliver meaningful improvements to housing affordability given the constraints of current federal and state policy settings, and with no

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

known future policy or funding settings to significantly boost social and affordable housing supply. It is extremely unlikely to improve housing affordability for very low and low income households, and at best this type of strategy is likely to improve affordability only for households on moderate incomes. This can be inferred from the already noted deterioration in housing affordability across the LGA, but is also reflected in recent research, from the Australian Housing and Urban Research Institute (AHURI) which found that:

*Most of the growth in housing supply has been taking place in mid-to-high price segments, rather than low price segments. There seems to be structural impediments to the trickle-down of new housing supply. Targeted government intervention might be needed in order to ensure an adequate supply of affordable housing.*⁹

We note that in Planning Priority 3, it is stated that “more medium sized homes will enable families with young children to stay in the area” as they are “more affordable than larger homes”. Given that the price of property in Sydney and other metropolitan areas is largely determined by the price of land and market demand rather than dwelling size, it is unlikely that the effect of delivering more medium sized dwellings will be significant for moderate income families. It will not assist lower income families in being able to stay in the area considering they are unlikely to be able to save a deposit and purchase a medium sized home, or to rent one without being in housing stress.

It is therefore important for Local Government authorities to consider the types of intervention that are available to them within the policy and funding frameworks set by federal and state governments.

We strongly support Action 4.1 of the LSPS that commits to prepare an Affordable Housing Contributions Scheme for Parramatta Road Corridor and to investigate “opportunities to provide key workers housing along the corridor”. We recommend, however, that the affordable housing created is not specifically reserved for key workers but for a range of incomes and target groups.

In addition, Shelter NSW strongly recommends the development and implementation of other specific measures to address the need for more affordable housing identified in the LSPS and achieve Burwood Council’s vision:

1. Set an affordable rental housing target in the LSPS/LHS as a percentage of new dwelling floor space in the LGA. Shelter NSW recommends between 10-15% depending on financial feasibility.
2. Advocate to State Government for an Affordable Housing Contributions Scheme under SEPP 70 to be prepared for the Burwood, Strathfield and Homebush Planned Precinct. Such a scheme would be particularly viable in Burwood and Strathfield Town Centre.
3. 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 use of section 7.11 contributions. This could be done in Planning Priority 3.

⁹ Ong, R., Dalton, T., Gurran, N., Phelps, C., Rowley, S. and Wood, G. (2017) *Housing supply responsiveness in Australia: distribution, drivers and institutional settings*, AHURI Final Report No. 281, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/final-reports/281>

4. Consider purchasing land in the LGA for direct delivery of affordable housing by Council as part of Action 2.7 of the LSPS, considering that affordable housing is “infrastructure that will deliver public benefits”.
5. Commit to investigate changes as part of the review of the DCP to encourage homes close to jobs and mixed use in town centres, such as top shop housing and other innovative infill measures.

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. This is particularly appropriate for Burwood LGA where a lot of development will happen, with a projected annual rate of growth of 2.4%, the fourth largest in Sydney as indicated page 17 of the LSPS.

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 Burwood Council’s 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.

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 Planning Priority 3 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 Burwood Council 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.

We would like to see the commentary of the LSPS strengthened to state clearly that Council will advocate to State Government for increased provision of social housing within the LGA. This could be done as part of Planning Priority 2, where Council is already outlining that it will work with NSW Government for delivery of appropriate infrastructure such as educational facilities and transport. Social and affordable housing should be included in this collaborative work for delivery of infrastructure to meet local needs.

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.

Shelter NSW strongly supports the action 4.4 of the LSPS that Council will work in partnership with neighbouring councils on potential infrastructure upgrades. We recommend that this commitment is expanded to include working with neighbouring councils in delivering more affordable housing across council boundaries. 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 action or Planning 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. We would recommend however that the LSPS is reviewed sooner than every 7 years as statutorily required, aligning the review of the LSPS with the review of the LEP and DCP every five years.

As mentioned previously, we are concerned, however, with the lack of specific data and evidence around housing affordability in the area. The LSPS *Implementation, Monitoring and Reporting* section (page 59) 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 Implementation Section 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. Include additional local data about levels of income housing affordability in the LSPS (median income, median dwelling prices, levels of housing stress, mortgage stress, etc.)
2. Strengthen language throughout the LSPS and in the Liveability Section (Planning Priorities 3,4,5) to recognise the need for housing that is affordable to people on very low to moderate income, including specific affordable housing dwellings.
3. Include a 5 year and 10 year target for affordable housing dwellings in the LSPS and the LHS
4. Strengthen the details around the housing diversity strategy by including the planning mechanisms that Council will use to promote a more diverse housing supply (for example, define “medium sized home” and mandate a dwelling mix through the DCP)
5. Include targets for increase in the number of dwellings that meet universal design criteria and specify the planning instruments Council will use to meet these targets, such as
 - 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

6. Explicitly commit to the built environment and amenity in the LGA being designed to be accessible to all members of the community, for example through reference to the Seven Principles of Universal Design.
7. Explicitly recognise affordable housing as social and economic infrastructure in the LSPS, for example in Planning Priority 1 or 2.
8. Commit in LSPS/LHS to investigate exemptions from section 7.11/7.12 contributions for Community Housing Providers (CHP).
9. Set an affordable rental housing target in the LSPS/LHS as a percentage of new dwelling floor space in the LGA. Shelter NSW recommends between 10-15% depending on financial feasibility.
10. Advocate to State Government for an Affordable Housing Contributions Scheme under SEPP 70 to be prepared for the Burwood, Strathfield and Homebush Planned Precinct.
11. 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 use of section 7.11 contributions. This could be done in Planning Priority 3.
12. Consider purchasing land in the LGA for direct delivery of affordable housing by Council as part of Action 2.7 of the LSPS, considering that affordable housing is “infrastructure that will deliver public benefits”.
13. Commit to investigate changes as part of the review of the DCP to encourage homes close to jobs and mixed use in town centres, such as top shop housing and other innovative infill measures.
14. Commit to working with neighbouring councils in delivering more affordable housing across council boundaries in the area.
15. Align the review of the LSPS with the review of the LEP and DCP.
16. Include any specific indicators to measure success regarding better housing affordability in the area in the LSPS *Implementation, Monitoring and Reporting* section.

Further discussion

Thank you for the opportunity to take part in the formulation of Burwood Council Local Strategic Planning Statement. 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



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