



Hawkesbury City Council

attachment 2
to
item 136

Draft Submission to the Department of
Planning, Industry and Environment

date of meeting: 28 July 2020
location: by audio-visual link
time: 6:30pm

Our Ref: A Housing Strategy for NSW – Discussion Paper

23 July 2020

Housing Strategy Implementation Unit
Land and Housing Corporation
Department of Planning, Industry and Environment
Locked Bag 4009
Ashfield BC, NSW 1800

Dear Sir/Madam

Hawkesbury City Submission – A Housing Strategy for NSW

Hawkesbury City Council (Council) would like to thank you for the opportunity to make a submission on the above mentioned 'A Housing Strategy for NSW' Discussion Paper currently on exhibition until 24 July 2020.

Council recognises the importance of housing as a basic need for residents and in principle supports the housing strategy as a framework to lever the supply, location and types of housing in NSW. Council understands that the housing system is beyond the responsibility of a single agency or the Government, and is affected by other policy areas including environment, economy, infrastructure, social services and health.

Hawkesbury City Council is supportive of working in collaboration with the State Government and stakeholders including community housing providers to ensure housing, particularly social and affordable is delivered in an efficient and affordable manner.

With respect to housing, the matters considered to be of most relevance to the Hawkesbury LGA are:

- Limited diversity in housing types (need for greater diversity in housing stock)
- Ageing of the population (need for flexible/adaptive housing)
- Reliance on low density development and urban form (low rates of public transport use and high car dependency)
- Housing affordability (particularly rentals)
- Social housing and homelessness
- Meeting housing targets/population projections specified in NSW State Government Plans and balancing this with significant considerations/constraints (flooding, bushfire risk, biodiversity, agricultural/rural lands, urban heat, heritage/character of towns and villages)
- Impacts of increased housing on agricultural lands.
- Ability to plan for a longer term supply of residential land given uncertainty around a number of matters eg. Strategic Transport Routes and Metropolitan Rural Area context

The release of the Sydney Region Plan - "A Metropolis of Three Cities" and Western City District Plan in March 2018 provided a direction to metropolitan councils on a range of themes, including Liveability.

The Sydney Region Plan and Western City District Plan include Directions and Objectives for councils to follow in order to start planning housing delivery in each Local Government Area for the next 20 years. The Plans also set 5 year housing targets and require Councils to assess their future housing targets through their Local Strategic Planning Statements and Local Housing Strategies.



At the same time these Plans were released, the *Environmental Planning and Assessment Act 1979* was amended to include section 3.9 – Local Strategic Planning Statements for Councils; a requirement where each Council had to prepare a 20 Year Land Use Vision having regard to economic, social and environmental matters.

During the making of the Draft Local Strategic Planning Statement, another requirement was introduced through the Greater Sydney Commission and the Department of Planning, Industry and Environment for a Local Housing Strategy to be undertaken by each Council as part of their Local Strategic Planning Statement work.

The Department of Planning, Industry and Environment have also provided a Guideline – A step-by-step process for producing a local housing strategy in 2018. The Local Housing Strategy is to:

- Establish a Council's vision for providing housing in a local government area.
- Link a council's vision for housing with the housing objectives and targets of the Sydney Region Plan and Western City District Plan.
- Be prepared by Councils in consultation with communities
- Detail how and where housing will be provided in the local areas
- Include consideration of demographic factors, local housing supply and demand, and local land use opportunities and constraints.
- Identify areas of local cultural, environmental, heritage or local character.

Whilst Hawkesbury City Council welcomes "A Housing Strategy for NSW – Discussion Paper", it also regrets the timing of this paper given most Councils have advanced preparation of their Local Housing Strategies and may have missed some opportunities which are highlighted through this Discussion Paper.

Whilst it would have been beneficial to have a NSW Housing Strategy prior to work commencing on local strategies by each council, Hawkesbury City Council has completed or is currently in the process of preparing various background studies which have informed the preparation of Council's submission to this Discussion Paper, including:

- Hawkesbury Demographics Study
- Draft Hawkesbury Local Housing Strategy
- Draft Hawkesbury Rural Lands Strategy

Key points that Council would like to raise in the Draft Submission include:

- Need for consistency of approach to flooding related matters (flood planning controls)
- Need for diversity in housing types
- Need for resilience in housing, including design for conditions and better housing design (consideration of constraints and risk that is responsive to environment including changing climate, urban heat, and flooding in order to provide better designed living spaces)
- Housing needs of ageing population (need for flexible/adaptive housing)
- Address the mismatch between housing size and dwelling type/size
- Impacts of increased housing on agricultural lands.
- Reliance on low density development and urban form (low rates of public transport use and high car dependency)
- Housing affordability (particularly rentals)
- Ensuring that the identified needs of social, affordable housing and homelessness are appropriately addressed
- Meeting housing targets/population projections specified in NSW State Government Plans and balancing these with significant considerations/constraints (flooding, bushfire risk, biodiversity, agricultural/rural lands, heritage/character of towns and villages)
- Ability to plan for a longer term supply of residential land given uncertainty around a number of matters eg. Strategic Transport Routes and Metropolitan Rural Area context
- Ability to influence provision of type of housing that is reflective of the Peri- Urban/semi rural location



- Ability to provide planning provisions that are reflective of Council's resolved position with respect to permissibility of Detached Dual Occupancies and Secondary Dwellings
- Ability for councils to include design excellence provisions that are tailored to the unique characteristics of location and the needs of the community, including density and form
- Provision of an assessment of the costs involved in upgrading of existing housing stock given areas of relatively low growth rely on existing housing stock that in many cases is not fit for purpose given a range of social and environmental changes
- Greater emphasis to be placed on design led solutions to housing that are reflective of circumstances, including flood affected areas in order to lessen impacts to residents and provide for lower insurance premiums as a result.

Further details with respect to these various points are included below:

Need for consistency of approach to flooding related matters (flood planning controls)

Hawkesbury City Council recognises that the Hawkesbury Nepean Valley has significant impacts from flooding, and is recognised by the Insurance Council of Australia as having one of the highest if not highest risks in NSW.

Having said that, it is considered that there needs to be a consistency of approach and certainty in terms of flooding planning controls across NSW and particularly the application of flood planning controls with respect to the Probable Maximum Flood and 1:100 chance flood levels.

Consideration of housing balanced with a range of environmental considerations including flooding and floodplain management is considered to be of paramount importance.

Need for diversity in housing types

Council's draft Local Housing Strategy has identified that the existing housing stock is dominated by single detached dwellings, and that as a consequence of changing demographics and trends there is a need to facilitate greater diversity of housing types.

A diverse range of housing will be needed in Hawkesbury, building upon commitments to deliver traditional detached dwellings and lower impact medium density typologies.

These housing typologies will accommodate the varied and complex mix of households expected in the future. These household types are best described through the evolution of households in the context of a family life cycle.

Stages in the family life cycle have traditionally been linked with the housing choice. Housing needs per household are largely defined by the life cycle stages of individuals and families. The traditional lifecycle stages are:

Stage 1: the life cycle begins by the first move from the parental home - a time when two partners in a relationship decide to move into a (commonly rented) dwelling which is often a small self-contained apartment, and the occupants are saving to purchase a home. Renting the dwelling is often thought of as a transitory period, with ownership as the long term goal

Stage 2: the arrival of children which corresponds with the need for larger living and sleeping areas, in the form of a separate dwelling. The family dwelling is often purchased with a mortgage, with the intention of becoming an owner-occupier

Stage 3: As the family grows, more space is required and alterations to the family home are made or upgrading or relocation is the next housing choice. Children are now teenagers or young adults and may be seeking a place of their own although more commonly, young adults are staying in the family home longer to save for their own housing choice

Stage 4 the departure of children from the family home (who will begin their housing life cycle at stage one) results in parents downsizing their housing choice, seeking a smaller dwelling.



LGA requires a diversity of housing types to cater for the varied and complex mix of household stages.

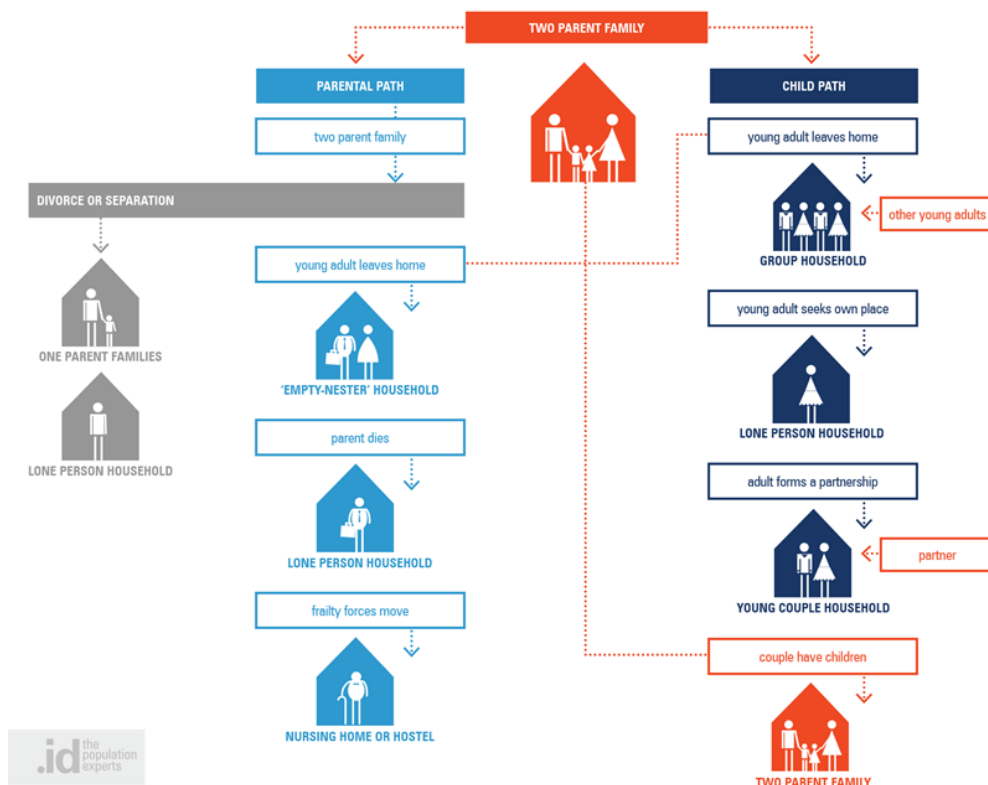


Figure 1 - Traditional Lifecycle Stages

Need for resilience in housing, including design for conditions and better housing design (consideration of constraints and risk that is responsive to environment including changing climate, urban heat, and flooding in order to provide better designed living spaces)

The Discussion Paper recognises the impact of climate change and its effect on the liveability and longevity of the communities of NSW, and considers options to be incorporated into new housing and precincts such as:

- using bush fire-resistant materials and designs;
- using light coloured roofing to minimise heat ;
- raising floor levels that may flood ;
- using heat resistant materials in telecommunications or electrical equipment ;
- using roofing materials that reduce impacts of hail damage ;
- using the planning system to locate new housing away from flood-prone land or land at risk from bushfires and other natural hazards; and
- designing the landscape around housing to provide shading and reduce temperatures.

The innovative options to be incorporated into new housing and precincts are great incentives to mitigate urban heat through the building developments. However, in order to implement these options it is necessary that the Building Code of Australia is amended together with planning legislation and policies to reflect these innovations. It is also important to ensure that the building industry is consulted in order to analyse the cost viability and associated insurance requirements of including these options into developments.

Housing affordability is already a major issue in Australia and in comparison to other states; NSW property prices are already much higher.



It should be noted that any new building material that is responsive to the impacts of a changing climate would be welcome, particularly if it did not compromise housing affordability for residents of NSW and Hawkesbury in particular.

Housing needs of ageing population (need for flexible/adaptive housing)

The Hawkesbury as with the majority of other local government areas across Australia has an increasingly ageing population. The need to ensure that the housing needs for this ageing population is considered essential through incentives and criteria to include flexible and adaptive housing. Investment in such an approach will save costs in the longer term and ensure that needs of an ageing population are met.

Impacts of increased housing on agricultural lands.

As a peri urban Local Government Area, Council recognises the importance of protecting agricultural lands from increased housing, and would welcome further discussion with the NSW State Government in terms of the challenges associated with meeting set housing targets/projections versus the protection of agricultural lands.

Housing affordability (particularly rentals)

Through an Affordable Housing Working Group of Council's Human Services Advisory Committee, Council has adopted a number of recommendations with respect to Affordable Housing. These recommendations are focussed on the following key themes:

- Partnership;
- Planning;
- Property; and
- Providing Leadership.

Recognising that addressing the issue of Housing Affordability is not the remit of a single level of government, Council is committed to playing its role in terms of this issue guided by the above themes.

Hawkesbury City Council is also part of the preparation of an Affordable Housing Strategy across the Western City District area, with the Strategy to:

- Provide context for the need of affordable housing
- Summarise best practice
- Provide the basis for a consistent Western City District approach

Ensuring that the identified needs of social, affordable housing and homelessness are appropriately addressed

The "Housing Affordability and Homelessness Insights", a study undertaken by Wentworth Housing and Western Sydney Community Forum in April 2019 to analyse housing affordability and homelessness from diverse perspectives across Australia and NSW. A comparative analysis across the Western Sydney region local government areas was completed to ascertain key trends that impact strategic decision making for social and affordable housing. The study identified that:

- More than 110,000 households are in housing stress;
- 32.8 percent of renting households are in rental stress;
- Rental costs increased at a higher rate than incomes, with most areas showing a higher price to income gap than Greater Sydney;
- Homelessness increased significantly since 2011 at a far greater rate than the state and national increases;
- The current social and affordable housing supply only met 40.6 percent of the total demand;



- Almost 6,500 additional social and affordable housing dwellings are needed per annum to meet the forecast demand in 2036;
- Home sale prices grew at a faster rate than Greater Sydney overall from 2013 to 2018.

The need to address the deficit of social housing is considered essential and should form a key commitment from Government.

Meeting housing targets/population projections specified in NSW State Government Plans and balancing these with significant considerations/constraints (flooding, bushfire risk, biodiversity, agricultural/rural lands, heritage/character of towns and villages)

Work associated with the preparation of the Draft Hawkesbury Local Strategic Planning Statement and Draft Hawkesbury Local Housing Strategy has highlighted the significant layers of constraints associated with the provision of additional housing within the Hawkesbury Local Government Area.

Council would welcome further discussion with the NSW State Government with respect to the imposition of housing targets/population projections for the Hawkesbury Local Government Area within the Sydney Region Plan and Western City District Plan. The level of identified constraints is such that meeting identified targets/population projections is considered to be problematic given the need to balance housing needs with other objectives.

Ability to plan for a longer term supply of residential land given uncertainty around a number of matters eg. Strategic Transport Routes and Metropolitan Rural Area context

Strategic Transport Routes

Planning for housing in a number of areas within the Hawkesbury Local Government Area is impacted by uncertainty around key strategic transport routes, and importantly the provision of infrastructure to support existing and future housing.

Council is advocating for the provision of greater certainty in terms of the following:

- Role and function of Bells Line of Road
- Outer Sydney Orbital (current corridor planning terminates at Richmond Road)
- Construction of 1951 Castlereagh Freeway corridor and connections to this corridor
- Additional crossing of the Hawkesbury River (including flood immunity).

Metropolitan Rural Area

The Sydney Region Plan and Western City District Plan identify the Hawkesbury Local Government Area as 'Metropolitan Rural Area' except for the Vineyard Precinct. This adds a further level of consideration in terms of future housing development given the policy context is emerging, and increasingly likely to impact on the future housing and employment lands delivery.

Hawkesbury City Council is committed and always willing to work closely with the State Government (Department of Planning, Industry and Environment) to ensure that Council is able to facilitate the provision of appropriate housing, in the right locations and at the right time.

Ability to influence provision of type of housing that is reflective of the Peri- Urban/semi rural location

Hawkesbury City Council is a peri urban Council, and as such with a mix of metropolitan and regional characteristics. The ability for Council to influence the type of housing in this context is considered essential to maintaining the unique characteristics of the Hawkesbury Local Government Area.



Ability to provide planning provisions that are reflective of Council's resolved position with respect to permissibility of Detached Dual Occupancies and Secondary Dwellings

Council has a resolved position in terms of the permissibility of Detached Dual Occupancies and Secondary Dwellings within Rural zones of the Hawkesbury Local Government Area. Applications to the NSW State Government to amend the Hawkesbury Local Environmental Plan 2012 in this respect have to date been unsuccessful. Council would welcome further discussion with the NSW State Government with respect to this matter.

Ability for councils to include design excellence provisions that are tailored to the unique characteristics of location and the needs of the community, including density and form

It is considered by Hawkesbury City Council that it is imperative the councils have the ability to tailor the planning controls within their local government areas to be reflective of the unique characteristics of the location and the needs of its community.

The imposition of planning controls on areas that is not reflective of the local characteristics of an area is considered to be highly problematic. For the Hawkesbury Local Government Area this has particularly been the case for the Vineyard Precinct of the North West Growth Area.

Provision of an assessment of the costs involved in upgrading of existing housing stock given areas of relatively low growth rely on existing housing stock that in many cases is not fit for purpose given a range of social and environmental changes

It is considered that the assessment of costs and development of strategies associated with upgrading of existing housing stock should be undertaken as part of the NSW Housing Strategy.

Particularly for local government areas experiencing relatively lower levels of growth, it is through improvements to the existing housing stock that many of the objectives outlined in the Discussion Paper will be achieved.

Greater emphasis to be placed on design led solutions to housing that are reflective of circumstances, including flood affected areas in order to lessen impacts to residents and provide for lower insurance premiums as a result.

The rising costs associated with insurance premiums within the Hawkesbury Local Government Area is considered to be an increasingly problematic issue. These costs have now risen to an extent that many residents are simply unable to insure their properties, which in terms of resilience planning is highly problematic.

The importance of design led solutions to ensure that the provision of housing is reflective of constraints, including flood and bushfire is considered to be essential to considerations of future housing.

Thankyou for the opportunity to provide a submission to the Discussion Paper, on what is a very important issue to the Hawkesbury Local Government Area.

Yours faithfully