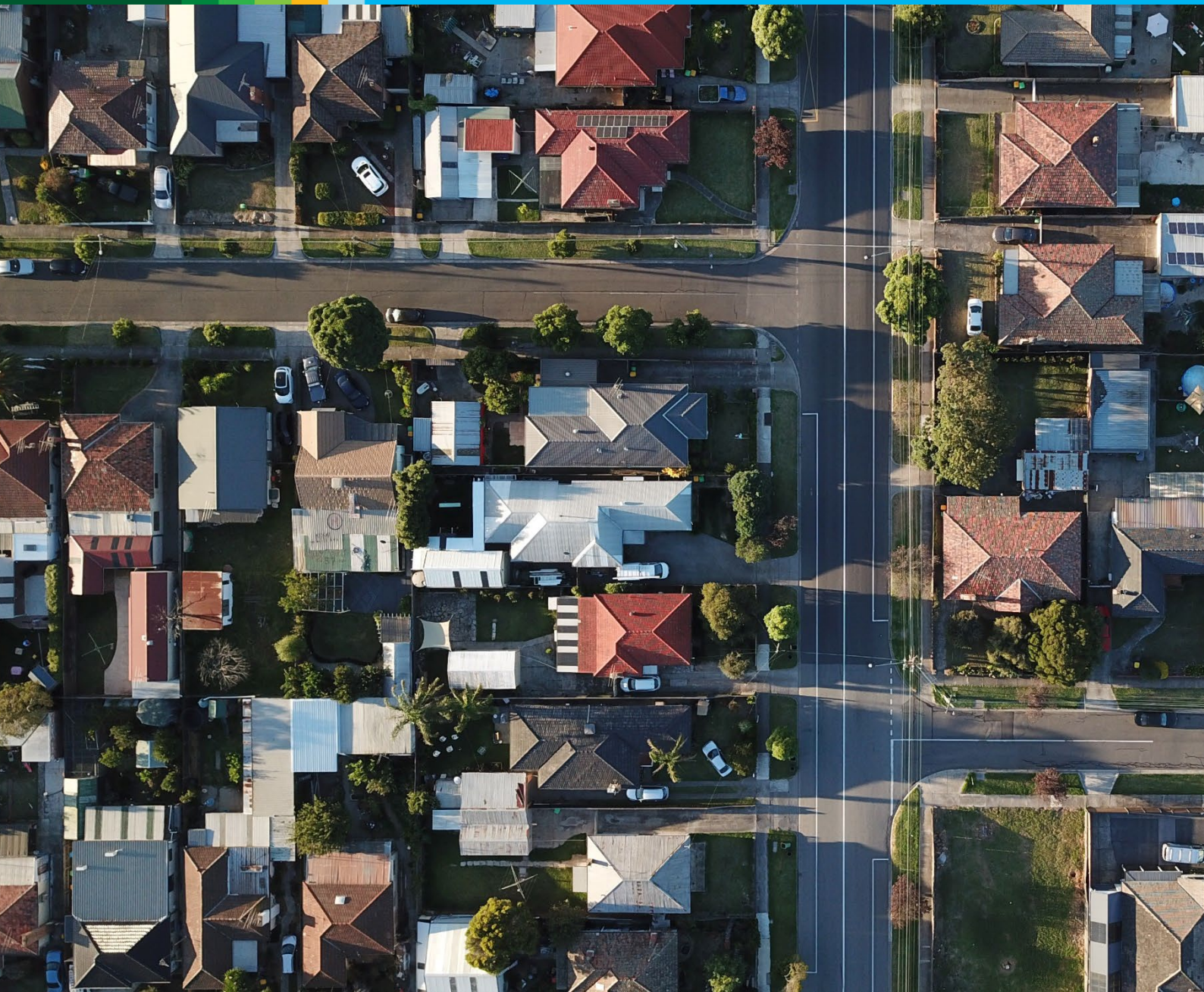


# Bega Valley Shire Affordable Housing Strategy



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# 1 Rationale for the strategy

## 1.1. Overview

Bega Valley Shire Council's *Affordable Housing Background Report*<sup>1</sup> sets out the evidence that supports the *Bega Valley Shire Affordable Housing Strategy* and should be read in conjunction with this *strategy*. A draft *strategy* was provided to Council in October 2021 and exhibited for an extended period. This final *strategy* has been revised to reflect relevant feedback from the large number of public submissions received.

The section provides a summary of relevant findings on housing demand, supply, need and affordability, and the legislative underpinning of Council's engagement with affordable housing, as a context for the priority strategies set out in Section 2 below.

## 1.2 What is 'affordable housing'?

Housing is 'affordable' when very low, low and moderate income households are able to meet their housing costs and still have sufficient income to pay for other basic needs such as food, clothing, transport, medical care and education. This is generally accepted to be where such households pay less than 30% of their gross household income on housing costs.

The following table provides benchmarks for 'affordable housing' for the purpose of this strategy. These are consistent with statutory definitions under the *Environmental Planning and Assessment Act 1979 (NSW)*, and should be updated at least annually to reflect changes in CPI.

Table 1.1: Relevant Affordable Housing Income and Cost Benchmarks – Rest of NSW (5)  
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	Very low-income h/h	Low-income h/h	Moderate-income h/h
Income Benchmark	<50% of Gross Median H/H Income for Rest of NSW	50-80% of Gross Median H/H Income for Rest of NSW	80%-120% of Gross Median H/H Income for Rest of NSW
Income Range (2)	<\$626/week	\$627-\$1,001/week	\$1,002-\$1,502/week
Affordable Rental Benchmarks (3)	<\$188 per week	\$189-\$300 per week	\$301-\$451 per week
Affordable Purchase Benchmarks (4)	<\$238,000	\$238,001-\$376,000	\$376,001-\$565,000

Source: JSA 2020, based on data from ABS (2016) Census and ABS (2020) Consumer Price Index, ANZ online home loan repayment calculator, [www.anz.com.au/personal/home-loans/calculators-tools/calculate-repayments/](http://www.anz.com.au/personal/home-loans/calculators-tools/calculate-repayments/)

<sup>1</sup> Judith Stubbs & Assoc. (2021) *Bega Valley Affordable Housing Background Report*, Bega Valley Shire Council.

<sup>2</sup> (1) All values reported are in December Qtr 2020 dollars; (2) Total weekly h/ income; (3) Calculated as 30% of total h/hold income; (4) Calculated using ANZ Loan Repayment Calculator, using 21 April 2021 interest rate (3.19%) and assuming a 20% deposit for a 30 year ANZ Standard Variable Home Loan and 30% of total h/hold income as repayments; (5) Median h/hold income \$1,168 (ABS Census 2016); CPI 117.2 Sept 2016 109.4 Adjusted income \$1,251

'Affordable housing' includes a wide range of housing products, tenures and price points. This includes, but is not limited to, special needs accommodation, social (public and community) housing, 'key worker' (discount market rent) housing, and assisted purchase (such as shared equity). It also includes 'lower cost' housing provided through the market (such as smaller flats and units, New Generation Boarding Houses), as long as affordable housing cost benchmarks in the table above are met.

### **1.3 Why is affordable housing important?**

Anyone in the community could need affordable housing. This includes a young person seeking to live near where they grew up to maintain family and community links, a recently separated or divorced person with children for whom conventional home ownership may no longer be economically viable, households dependent on one (or even two) low or median waged jobs, or an older person on a reduced retirement income, including after the death of a spouse.

Lack of affordably priced housing not only affects the quality of life of individual families, who may be sacrificing basic necessities to pay for their housing or facing increased stress due to living in severely overcrowded housing due to lack of supply, it also has a serious impact on employment growth and economic development. The inability of lower paid workers to find appropriate, affordable housing can limit the capacity of industry to grow, and adversely affect local economies, as is the case with regional areas like the Bega Valley Shire. The displacement of long-term residents due to lack of affordable housing also reduces social cohesion, engagement with community activities such as volunteering, and extended family support.

Affordable housing is thus an important form of community infrastructure that supports community wellbeing and social and economic sustainability, including a diverse labour market and economy, and strong and inclusive communities.

## **1.4 Demographic and housing issues**

### **1.4.1 Demographic and housing overview**

Bega Valley Shire had a population of 34,000 at the time of the 2016 Census, and an estimated residential population of around 34,800 in June 2020. The local government area (LGA) had experienced an annual growth rate of 0.7% over the previous decade, which was lower than the rate for Rest of NSW (0.9%), although the reported increase in in-migration since Covid-19 may have increased the local growth rate over the past two years.

Its population is much older than average and is projected to continue to age due to the natural aging of the population and nature of in-migration that reflects its ongoing attractiveness as a retirement area. Virtually all population growth to 2036 is projected to be amongst those aged 70 years of age or older, and amongst lone person households and couples without children.

Although dwelling growth has outstripped population growth, and is projected to do so to 2036, this is likely associated with the high rate of unoccupied private dwellings used as weekenders, short-term letting and holiday accommodation, which is double the rate of regional NSW (around 19% compared with 9%), and far higher in many attractive coastal areas of the shire.

Related to this, household size in the LGA is smaller than average and continues to decline; and median household incomes are much lower than average, with particularly low income profiles within and around Eden and Wallaga Lake. Although the overall SEIFA Index of Relative Socio-economic Disadvantage for the LGA is at the median for Australia (the 51<sup>st</sup> percentile), there are areas of severe disadvantage on this aggregate measure of community wellbeing, with the town of Bega in the most disadvantaged 13% of areas in Australia and Eden in the most disadvantaged 11% of areas, and pockets of severe disadvantage in SA1s in these towns (the most disadvantaged 3-5% of areas in Australia).

## 1.4.2 Housing supply and demand

The main dwelling type in the LGA is separate houses, with the proportion of this housing type basically unchanged since 2006, despite the aging of the population and changing housing need. Around 4,300 people aged 70+ were living in separate houses, many of them larger and often in areas that are relatively remote from transport and services. Together with projected affordable housing need, this indicates the need to increase the diversity of housing in well located areas, including smaller villas, flats and units, affordable seniors' developments for older renters and New Generation Boarding Houses within walking distance to major service centres as the population continues to age.

It is also important to note that the rates of both private rental (non-holiday)<sup>3</sup> and social (public and community) housing are much lower than the NSW rate. Only 19% of all occupied private dwellings are privately rented compared with 27% for NSW, and only 3% of dwellings are rented as social housing compared with 5% for NSW. Given growing need, it is also of concern that both the amount and the proportion of social housing has been declining since at least 2006, with a loss of around 50 social housing dwellings and a decline from 3.7% of dwellings in the past decade. Private rental has also declined in proportional terms over at least the 10 years to 2016, likely due to the increasing rate of Short Term Rental Accommodation (STRA).

It is important to note that only 26% of local housing had two or less bedrooms compared with 64% who were lone person and couple only households in 2016. As such, there is a significant and growing mismatch between housing supply and housing need in the LGA, which is likely to intensify over time unless there are active measures to increase the supply of smaller, more manageable dwellings near major town centres through the planning system.

## 1.5 Housing cost and affordability

### 1.5.1 Housing affordability issues

#### Renters

The affordability situation for very low and low income renters in the LGA is at crisis point. Median rents on separate houses were out of reach of very low and low income households, and a median-rental 3 bedroom house was affordable to less than half of those on moderate incomes.

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<sup>3</sup> Excluding visitor only households, which would also include holiday homes.

Table 0.2: Median Rent for Separate, Houses December Quarter 2020

Bega Valley Shire	Weekly Rent	\$330	\$380	\$490
	Affordability (NSW ex-Greater Sydney)	Affordable to 80% of moderate income band	Affordable to 47% of moderate income band	Affordable to higher incomes only
NSW ex-Greater Metro Region	Weekly Rent	\$310	\$370	\$475
	Affordability (NSW ex-Greater Sydney)	Affordable to 94% of moderate income band	Affordable to 54% of moderate income band	Affordable to higher incomes only

Source: NSW DCJ (2021) Rent Report No 134, Dec Qtr 2020; ABS (2016); ABS (2021) CPI Australia, Dec 2020

Whilst affordability for flats and units was somewhat better than for houses, a one bedroom flat was affordable to less than half of low income households, and a two bedroom flat was not affordable to any very low or low income renters.

Table 0.3: Median Rent for Flats and Units, December Quarter 2020

Bega Valley Shire	Weekly Rent	\$250	\$330	n/a (1)
	Affordability (NSW ex-Greater Sydney)	Affordable to 45% of low income band	Affordable to 80% of moderate income band	n/a
NSW ex-Greater Metro Region <sup>4</sup>	Weekly Rent	\$225	\$290	\$380
	Affordability (NSW ex-Greater Sydney)	Affordable to 67% of low income band	Affordable to 9% of low income band	Affordable to 47% of moderate income band

Source: NSW DCJ (2021) Rent Report No 134, Dec Qtr 2020; ABS (2016); ABS (2021) CPI Australia, Dec 2020

<sup>1</sup> Includes Greater Sydney and regional areas around Newcastle and Wollongong

(1) There were insufficient rentals available for 3 bedroom flats and units in the December Quarter 2020 for data to be reported.

## Purchasers

Affordable home purchase was also out of reach for very low and low income households in the Bega Valley Shire.

A median-priced strata dwelling was only affordable to the upper 70% of moderate income households in the September 2020 quarter, whilst a median priced house was only affordable to a higher income purchasing household.

## 1.5.2 Reasons for affordability problems

There are a number of reasons for the serious and growing affordability crisis in the Bega Valley Shire.

The LGA has a much higher than average rate of very low and low income households, which is related to its much older population, the disadvantaged profile of a number of areas and groups within the shire, and the income and labour market profile of people who are remaining in and moving to the area.

There is a very constrained supply of private rental and more affordable housing types, with a vacancy rate of around 0.5% at the time of writing and around 50% of advertised rentals in the short-term rental market. There is also a low supply of smaller, well-located one and two bedroom stock relative to demand, and a very low rate of growth in medium and higher density dwellings types over the past decade. There has also been a loss of lower cost accommodation options in Manufactured Housing Estates (MHE) and caravan parks as such development moves upmarket and to higher value tourist uses, and a lack of market uptake of more affordable accommodation types such as New Generation Boarding Houses through the *State Environmental Planning Policy (Housing) 2021 (SEPP Housing 2021)*.

In the context of constrained private rental supply, there has been a higher than average real increase in rent in the LGA over at least the past decade. This growth has been particularly steep over the past 12 months or so, with rents for one bedroom strata dwellings growing at 5 times the rate of increase for NSW, and rents on two bedroom strata dwellings growing at 5 times the average rate of increase. During the same period, rents actually dropped for smaller dwellings in Greater Sydney. This likely reflects the impacts of Covid-19, as increasing opportunities for working from home and other mobility factors increasing the attractiveness of regional areas like the Bega Valley Shire over the past 12 months or so.

There are also long-term and growing social housing supply gaps, with a much lower than average rate of social housing in the LGA (3% compared with 5% for NSW), and a decrease in social housing over at least the past decade in proportional and absolute terms. There is also a significant underoccupancy of larger, often older homes, and a 10 year or longer waiting time for smaller social housing dwellings in the LGA.

## 1.6 Affordable housing need

### 1.6.1 Overview

It is widely acknowledged that there is major shortfall in affordable housing in most cities and many regional communities across Australia.<sup>5</sup> The most severe and lasting impacts are experienced by very low and low income households in unaffordable private rental accommodation, who do not gain the benefits that accrue to home purchasers, including long-term capital gains and a decreasing debt to household income ratio over time;<sup>6</sup> and for whom social rental and home ownership are increasingly inaccessible.<sup>7</sup>

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<sup>5</sup> Darcy, M. and Stubbs, J. 2005. 'Housing and Contemporary Social Work Practice', in Alston, M. & McKinnon, J. (eds) *Social Work Fields of Practice*, Oxford University Press UK

<sup>6</sup> Burke, T. and Hulse, K. 2010. 'The Institutional Structure of Housing and the Sub-prime Crisis: An Australian Case Study', in *Housing Studies*, Vol. 2. No. 6, 821-838, November 2010.

<sup>7</sup> NSW Gov (2016) Future Directions for Social Housing in NSW <http://www.socialhousing.nsw.gov.au/>



Very low and low income renting households make up the majority of those in housing need in the Bega Valley Shire context, and require the strongest planning and market intervention in order to address their housing needs. As well as those on pensions and benefits in need of housing with deep subsidies, many of these are very low and low income workers in essential services, who would not be eligible for social housing.

By far, the greatest current and projected demand is for affordable dwellings to meet the large and growing population of older people, who require smaller, more manageable dwellings that are close to higher order services within the main urban centres. The provision of affordable family accommodation for low income renters with children is also a challenge due to the unaffordability of housing that is appropriate to their needs.

This is particularly serious given the rental crisis facing the LGA, where there was an extremely limited amount of private rental available at the time of writing, and virtually nothing for rent through the private market that was affordable to any very low and most low income households.

### **1.6.2 Affordable housing need**

Based on current and projected housing stress, housing market trends, and population and dwelling projections, there is a total projected need for almost 2,500 affordable dwellings by 2036. As shown in the table below, of these:

- 67% would be renters and 33% would be purchasers
- 52% would be very low income households, 29% would be low income households and 19% would be moderate income households
- 70% would need dwellings suited to smaller (one and two person households) and 30% would need dwellings suited to families with children, based on current household housing stress distribution and projected household type increase.

At least 75% of this need (1,750 households) is unlikely to be met through the market, and will need deep subsidies and/or the direct creation of affordable housing.

It is also noted that at least an additional 168 social rental housing dwellings would be required by 2036, with around 75% (126) of these smaller well located strata dwellings, and 25% (42) family dwellings. These are included in the table below in the number of affordable rental dwellings needed by very low income households. It is also likely that at least 100 supported places/accommodation options would be needed for people at risk of long-term homelessness in any given year.

By far, the highest need is for affordable housing for very low and low income renters, both in terms of the relative number of households in housing stress, and the seriousness of their affordability situation in the local market context.

Table 0.4: Total need for Affordable Housing to 2036

		Renting Households			Purchasing Households		
		Suitable for Lone Persons or Couples without Children	Suitable for Families with Children	TOTAL	Suitable for Lone Persons or Couples without Children	Suitable for Families with Children	TOTAL
<b>Total Affordable Housing Required by 2036 (Current + Projected Need)</b>	Affordable to Very Low Income Households	662	197	859	147	73	220
	Affordable to Low Income Households	212	239	451	144	116	260
	Affordable to Moderate Income Households	71	123	194	116	154	270
<b>+ Social Rental Housing to Maintain %</b>	SH Affordable to Very Low Income Households (2)	126	42	168	n/a	n/a	n/a
<b>+ Special Needs Accommodation</b>	Supported Places/ Dwellings	70	30	100	n/a	n/a	n/a
<b>TOTAL</b>	<b>All Dwellings/ Places</b>	<b>1,141</b>	<b>631</b>	<b>1,772</b>	<b>407</b>	<b>343</b>	<b>750</b>

Source: JSA calculations, using data from ABS Census of Population and Housing 2016 and .id Consulting Population Forecasts

### 1.6.3 Who are the target groups?

Very low, low and moderate income households as defined by the *Environmental Planning and Assessment Act 1979 (NSW)* make up 72% of the population of the LGA compared with 60% for Rest of NSW. As such, a majority of current and future residents potentially benefit from strategies to increase the supply of affordable housing.

In the local context, they are made up largely of working households including lower income key workers as well as those on pensions and benefits, such as the Aged or Disability Pension, Parenting Payment and JobSeeker Allowance.

Some examples of very low income key worker households include a lone person working part-time as a lower-level aged care worker, earning around \$600 for a 30 hour week; or as a casual cleaner earning around \$600 for a 25 hour week. These households would need to pay less than \$180 rent per week for their housing. These households could not afford to rent anything in the LGA.

Examples of low income key workers include a full time process worker, aged care worker, storeman or enrolled nurse living alone and earning \$765 to \$900 per week; or a couple with a young child, with one person caring for the child and the other working full-time as an experienced nursing assistant, and earning around \$850 per week. These households would need to pay between \$230 and \$270 rent per week for their housing to be affordable. They would be unable to afford to rent any houses in the Bega Valley Shire, and would only be able to rent a median priced one bedroom unit, but nothing larger.

Moderate income key worker households include a lone person working full-time as an ambulance officer, or entry level teacher or registered nurse earning around \$960 to \$1,330 per week; or a couple with one person working part-time as a cleaner and the other as a processor worker in food production, earning around \$1,400 per week. These households would need to pay between \$300 and \$420 rent per week for their housing to be affordable. They could afford to rent a two or three bedroom unit, were the latter to be available.

Some examples of very low income households that are dependent on Centrelink payments are a single aged pensioner with no superannuation on a pension of \$476 per week including relevant supplements, who could afford to pay \$193 in rent including Commonwealth Rental Assistance;<sup>8</sup> and a single person on JobSeeker Allowance, who would have an income of \$310 per week, and could afford to pay \$143 in rent including Commonwealth Rental Assistance. These households could not afford to rent anything in the LGA.

## 1.7 Council's role and statutory responsibilities in relation to affordable housing

The creation of affordable housing for very low, low and moderate income households through the planning system becomes more important in the context described above. The inability of the market to provide for virtually all very low income renters, most low income renters, and many low income purchasers is noted, and is a particular focus of this *strategy*. The growing number of homeless and marginally housed people in the LGA is also important.

There are significant opportunities for local government to support the creation and maintenance of affordable housing through core planning legislation and policies in NSW, and a statutory requirement to consider this issue. Local government has an implicit role in affordable housing and an impact on affordability through land use zoning, controls, the timing of land release, location of services and facilities, and the levying of rates and development contributions.

Local government can also choose to play a more proactive role in the creation and retention of affordable housing through active intervention in the market through the development of

appropriate planning mechanisms and strategies, and through investment of funds and/or land for the purpose of affordable rental housing.

In NSW, objects and a range of related provisions have been progressively included in the *Environmental Planning and Assessment Act 1979*, including section 1.3(d), which provides that an objective of the Act is the 'maintenance and provision of affordable housing'. There are likewise definitions and benchmarks related to 'affordable housing' in core legislation and related policies which have been adopted in this *strategy*.

It is also a requirement of the Act that a consent authority take into account the social impacts of a development application as part of a merits assessment under section 4.15(1)(b). This is relevant to development applications that may result in the loss of affordable or low cost housing, as well as the assessment of community benefits involving the creation of affordable housing.

Section 7.4 of the Act provides for the making of a voluntary planning agreement in relation to a proposed amendment to a planning instrument or development application. Under such a planning agreement, a developer is required to dedicate land free of cost, pay a monetary contribution, or provide any other material public benefit, or any combination of them, to be used for or applied towards a public purpose. 'Affordable housing' as defined in the Act is one of the listed 'public purposes'.

The Act also enables councils to levy mandatory contributions for affordable housing in accordance with State Environmental Planning Policy Housing 2021. In February 2019, Housing SEPP 2021 was expanded to include all NSW councils, including Bega Valley Shire Council, provided a council can demonstrate affordable housing need and the economic viability of an Affordable Housing Contributions Scheme (AHCS) under the DPIE Guideline and its Viability Tool. The next step in the process is for a council to prepare an AHCS, and to amend their LEP to reference the schemes.

As such, local government has a role and indeed a statutory responsibility to seek to preserve and create affordable housing through the planning and assessment process.

# 2. Strategies and mechanisms to deliver affordable housing

## 2.1 Overview of strategies and mechanisms

There are a wide range of potential strategies available to Bega Valley Shire Council, and others with a role in affordable housing, to increase affordable housing in the LGA, as shown in Table 2.1.

These strategies range from ‘light’ planning intervention in the market (Column 1 in the table), and facilitative intervention through the planning system (Column 2), to ‘strong’ intervention (Column 3), or ‘direct provision’ of affordable housing (Column 4).

As noted in the *Bega Valley Shire Affordable Housing Background Report*<sup>9</sup>, some of these strategies are more or less likely to be effective in the local housing market context. Those likely to be most effective, and that are most favoured from consultations, are the focus of this *strategy*.<sup>10</sup>

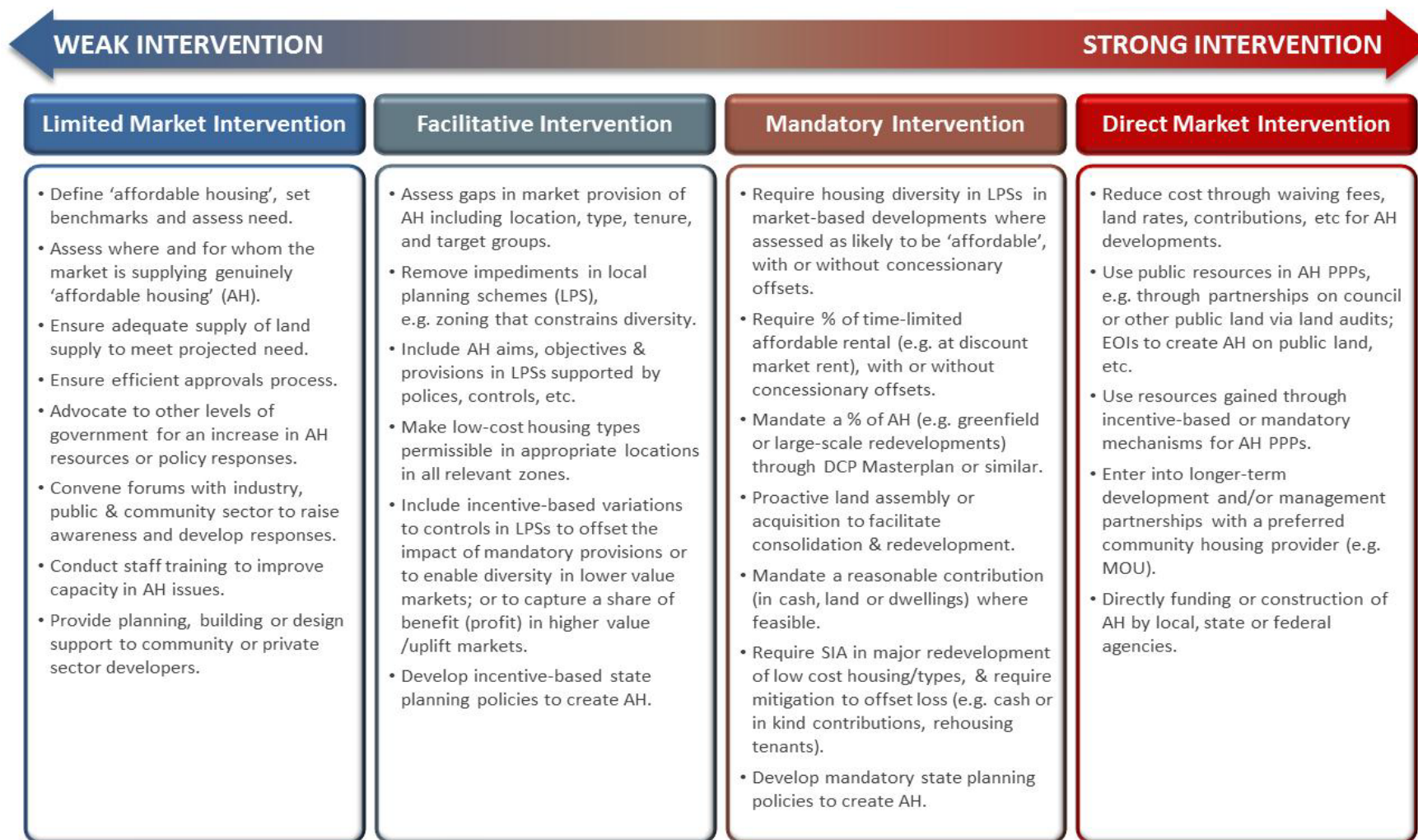
A Case Study Booklet has also been prepared by JSA which showcases a number of ways in which local government has engaged with affordable housing issues in their local communities (provided as Attachment A to the *Background Report*).

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<sup>9</sup> JSA *op cit*.

<sup>10</sup> Refer JSA (2021) *Bega Valley Shire Affordable Housing Background Report* and related appendices for a more complete discussion of the effectiveness of different mechanisms in the local context.





Source: Stubbs (2003); JSA (2011)

Figure 2.1: Mechanisms and Strategies to Create Affordable Housing along a Continuum of Planning Intervention

## 2.2 Target delivery timeframes

### 2.2.1 Overview

The following provides a brief overview of strategies in terms of their priority and indicative implementation timeframe. In accordance with Council's Integrated Planning and Reporting framework and level of urgency, strategies have been designated as Short-Term (1 year), Medium-Term (2-4 years) and Long-Term (5-10 years).

### 2.2.2 Short-term (1 Year) strategies

**Strategies 1, 2 and 3:** Adopt and resource the *strategy*, including:

- dedicating a Strategic Planner (3 days/week) and establishing an Affordable Housing Implementation Group to resource
- seeking funding to develop proposals on Council and other public land
- adopting Affordable Housing definition and benchmarks
- adopting Affordable Housing targets
- adopting and monitoring KPIs (ongoing).

**Strategy 4:** Advocating to the NSW Government to maintain and increase capital investment in social housing in the Bega Valley Shire, including maintenance and upgrade of existing stock, and construction of new stock (at least 150 new social housing dwellings and 100 supported places for those at risk of long-term homelessness).

**Strategy 5:** Advocating to the Australian and NSW Governments for, and supporting development of, alternative crisis and short-term accommodation options for the significantly growing number of homeless people in the LGA, including:

- 'meantime use' of vacant or underutilised Council, public, community and private buildings and regulatory support and flexibility for their use as crisis and short-term accommodation
- pop-up models of crisis accommodation, such as a 'Winter Sleep-In' pilot in Council or Church halls
- placement of at least four small manufactured homes (MHs) or tiny homes on vacant public or private (philanthropic) land
- planning and resourcing support for not-for-profits (NFPs) or Community Housing Providers (CHPs) seeking to engage in these activities
- seeking funding for upgrades and conversions of buildings where relevant
- developing a community awareness campaign on homelessness.

**Strategy 6:** Support local NFPs to pilot a brokerage scheme that matches owner occupiers in large homes with people who are at risk of homelessness, key workers, etc.

**Strategy 8:** Developing internal processes to fast-track or prioritise developments that can demonstrate they will provide genuinely 'affordable housing' in accordance with benchmarks

in this *strategy* and definition in Strategy 8; linking relevant parties; and providing advice for those seeking to develop affordable housing.

**Strategies 14:** Conduct research and make representations to the NSW Government on the social and economic impacts of Short Term Rental Accommodation in the Bega Valley Shire.

**Strategy 17a:** Conduct more detailed feasibility analysis on the potential for an Affordable Housing Contributions Scheme including precincts where it would be viable, relevant contribution rates, etc in accordance with the DPE Viability Tool.

**Strategy 19:** Seek to identify and allocate in principle at least four Council-owned sites for affordable housing partnership developments with a local CHP or NFP, including more detailed site assessment, feasibility analysis and consideration of additional site including airspace above Council car parks, and noting preliminary research that such developments can be cost neutral or provide a return to Council, depending on yield, tenure and partnering arrangements.

**Strategy 23a-c:** Continue to work with NSW Government departments to identify redundant or underutilised public land or buildings for affordable housing developments, conduct site assessment and feasibility analysis, and gain in principle agreement for use of this land for the purpose of affordable housing.

**Strategy 25a-e:** Actively support the development of new, culturally appropriate housing developments on Aboriginal and publicly owned land through providing a dedicated Council resource to provide planning support and analysis, and to advocate to other levels of government including Crown Lands for feasible sites and housing projects.

**Strategy 25f:** Advocate to Land and Housing Corporation and Aboriginal Housing Office for improved maintenance of existing social housing stock and co-design of future housing stock to ensure cultural appropriateness.

**Strategies 26 and 27:** Establish administrative and monitoring mechanisms.

### 2.2.3 Medium-term (2-4 years) strategies

**Strategy 7:** Amend Bega Valley LEP 2013 and DCP 2013 to facilitate increased development of residential flat buildings and multi dwelling housing close to / walkable from major town centres.

**Strategy 9:** Facilitate diverse, affordable and/or alternative housing options in Greenfield and infill areas including through:

- amending LEP and DCP controls in Greenfield areas and infill sites to facilitate more diverse and lower cost housing options
- investigating and where relevant making provision for alternative housing forms and developments such as housing co-operatives, community land trusts and multi-generational housing forms.

**Strategy 10:** Actively seek to facilitate New Generation Boarding Houses and co-housing through liberal permissibility, promoting their benefit and linking relevant stakeholders.

**Strategy 11:** Increase opportunities for long-term and permanent sites in caravan parks and MHEs.

**Strategy 12:** Develop a Planning Agreement Policy under section 7.4 of the Act based on the recommendations of strategy 17a above if a voluntary contribution rate or other parameters are supported.

**Strategies 15 and 16:** Develop incentives and relevant conditions of consent that seek to reduce the amount of STRA in the LGA, and increase the supply of long-term private rental housing, based on research into impacts.

**Strategy 17b:** Develop and seek approval for an Affordable Housing Contributions Scheme based on the recommendations of strategy 17a above.

**Strategy 18:** Mandate housing diversity to increase smaller strata dwellings in areas within or close to major town centres.

**Strategies 20 and 21:** Facilitate and/or complete the development of two affordable housing partnership developments on well-located Council land, including:

- an affordable caravan park, MHE or tiny home development
- a multi-tenure development including lower cost purchase, social and affordable (key worker) rental, and including a New Generation Boarding House (NGBH) component and smaller strata dwellings.

**Strategy 23 d-e:** Undertake negotiations and other work required to facilitate the development of at least one site or facility owned by another government authority for the purpose of affordable rental housing.

**Strategy 24:** Seek to increase the amount and suitability of existing social housing through title transfer or long-term (50+ year) lease from Land and Housing Corporation to a Registered CHP, and selective redevelopment to increase diversity and viability.

**Strategy 25g:** Actively support the development of culturally appropriate housing including through conducting a detailed needs analysis with Aboriginal organisations, and support for the development of co-designed projects.

#### **2.2.4 Long-term (5-10 years) strategies**

**Strategy 22:** Seek to facilitate and/or develop two additional affordable housing partnership developments on well-located Council land, preferably as multi-tenure developments.

**Strategy 23 d-e:** Undertake negotiations and other work required to facilitate the development of two additional sites or facilities owned by another government authority for the purpose of affordable rental housing.

## 2.3 Detailed strategies and mechanisms

### 2.3.1 Adopt the Affordable Housing Strategy

#### Rationale

It is important that Council is clear regarding the definition and benchmarks for ‘affordable housing’ so that it ensures that what is created meets the statutory definition, and so that it can properly evaluate applications or proposals that come before it. It is noted that ‘affordable housing’ will also include lower income essential workers, sometimes referred to as ‘key workers’.

It is also important that Council has mechanisms for monitoring the progress of the *strategy*, including Key Performance Indicators and indicative targets based on local housing need.

#### Strategies

##### Strategy 1

For the purpose of this strategy, Council adopts and adequately resources implementation of this strategy, including:

- a. Allocation of a dedicated staff resource for at least the first 3 years of implementation (for example, a strategic planner for 3 days per week)
- b. Seeking funding to support strategies related to the development of Council land for the purpose of affordable housing in partnership with Community Housing Providers, including the development of pilot or demonstration projects (see also Strategies 14-18)
- c. Convening and resourcing an Affordable Housing Implementation Group to implement and monitor progress of the *strategy*, including representation by Council elected representative and staff, community agencies and community representatives, and broadening representation to fill existing gaps, for example, from the Aboriginal community
- d. Adopting the definitions and benchmarks for ‘affordable housing’ as set out in Table 2.1, and ensure that these are updated at least annually in accordance with CPI.

Table 2.1: Relevant Affordable Housing Income and Cost Benchmarks

	Very low-income h/h	Low-income h/h	Moderate-income h/h
Income Benchmark	<50% of Gross Median H/H Income for Rest of NSW	50-80% of Gross Median H/H Income for Rest of NSW	80%-120% of Gross Median H/H Income for Rest of NSW
Income Range (2)	<\$626/week	\$627-\$1,001/week	\$1,002-\$1,502/week
Affordable Rental Benchmarks (3)	<\$188 per week	\$189-\$300 per week	\$301-\$451 per week



Affordable Purchase Benchmarks (4)	<\$238,000	\$238,001-\$376,000	\$376,001-\$565,000
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Source: JSA 2020, based on data from ABS (2016) Census and ABS (2020) Consumer Price Index, ANZ online home loan repayment calculator, [www.anz.com.au/personal/home-loans/calculators-tools/calculate-repayments/](http://www.anz.com.au/personal/home-loans/calculators-tools/calculate-repayments/)

### Strategy 2

For the purpose of this *strategy*, Council adopts an indicative target of 2,500 additional affordable (including social) housing dwellings by 2036, with a priority for very low and low income households, and including at least 100 dwellings/places with appropriate support for people with special housing needs including those at risk of long-term homelessness. As noted, a high proportion of those on low and moderate incomes are likely to be ‘key workers’.

Table 2.2: Indicative Targets for Affordable Housing to 2036

		Renting Households		Purchasing Households	
		Suitable for Lone Persons or Couples without Children	Suitable for Families	Suitable for Lone Persons or Couples without Children	Suitable for Families
Total AH Dwellings Required by 2036	Affordable to Very Low Income Households	858	269	147	73
	Affordable to Low Income Households	212	239	144	116
	Affordable to Moderate Income Households	71	123	116	154

Source: JSA calculations, using data from ABS Census of Population and Housing 2016 and id. Consulting

### Strategy 3

For the purpose of monitoring the progress of this *strategy*, Council will:

- a) Update data and information at least every four years in the *Background Report* that forms the evidence based for this *strategy*, and make this publicly available.
- b) Adopt the following Key Performance Indicators:
  - i. Number of affordable rental dwellings for very low and low income households created as a result of partnerships between Council and Community Housing Providers and/or the private sector. Data can be collected by Council
  - ii. Net change (loss/gain) in Social (Public and Community) Housing. Data can be obtained from DCJ – Housing and local Community Housing Providers
  - iii. Number of affordable rental dwellings for very low and low income households created through other agencies or mechanisms, including DCJ – Housing and local Community Housing Providers. Data can be collected by Council
  - iv. Number of affordable housing dwellings for very low and low income renters and low income purchasers provided through the market. Data can be obtained from DCJ – Housing Rent and Sales Reports
  - v. Increase in supply of lower cost housing types/products created through the market. Data can be obtained from DCJ – Housing Rent and Sales Reports
  - vi. Reduction in local homelessness, including appropriate accommodation of people living temporarily with others, or living in inappropriate, unsafe or severely over-crowded accommodation. Data can be provided by agencies such as Specialist Homelessness Services
  - vii. Reduction in the proportion of very low and low income households in housing stress. Data can be obtained from the Census every five years<sup>11</sup>
  - viii. Retention of diverse income, age and employment groups in the LGA. Data can be obtained from the Census every five years.
- c. Report progress against relevant strategies and KPIs annually to Council and the community.

### 2.3.2 Advocacy

#### Rationale

There has been a loss of social housing in both proportion and absolute terms over the past 10 years, and the LGA has a much lower than average proportion of social housing (3% compared

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<sup>11</sup> Note that levels of housing stress on very low and low income households can be reduced if increasing housing costs cause these people to be displaced. Consequently, this KPI must be considered in the context of changing demography as set out in the next KPI.

with 5% for NSW). Waiting times for social housing in the LGA are in excess of 10 years for one bedroom dwellings, and 5-10 years for two-bedroom dwellings and houses with 4+ bedrooms.

There are very high rates of severe housing stress among very low income renters indicate a high level of unmet need for social housing in the LGA, with around 1,125 very low income renting households projected to be in need of affordable (including social) rental housing by 2036. At least 150 new dwellings need to be designated for social housing tenants by 2036 to maintain average rates for the LGA; however, the very high rates of housing stress among very low income renters and aging of the population indicate that this would need to be far greater to meet growing need.

High and growing rates of homelessness and marginally housed people also indicate that there is a need for alternative accommodation to meet the special needs of these groups. At least 100 dwellings/places per year with some degree of support are likely to be required to accommodate those at risk of long-term homelessness. Local services noted that homelessness is at crisis point in the Bega Valley Shire in the context of the absence of any private rental opportunities for many of these vulnerable people, and long waiting times for existing social housing.

## **Strategies**

### **Strategy 4**

Council advocate to the NSW Government for a significant increase in capital investment in social housing as matter of urgency, including:

- a. A commitment to at least maintain existing amounts of social housing in the LGA
- b. A commitment to a publicly available strategic asset management plan that provides for appropriate maintenance and repair of existing stock, including an accelerated repairs and maintenance program by the NSW Land and Housing Corporation and local CHPs
- c. A strategic approach to selective redevelopment of existing stock to better meet current and projected need as part of this publicly available strategic asset management plan
- d. The funding of at least 150 new social housing dwellings, and 100 supported dwellings/ accommodation options for those at risk of long-term homelessness as a matter of urgency.

### **Strategy 5**

Council will seek alternative housing options for the growing number of homeless and at risk people in the shire as a matter of urgency, including:

- a. Investigating and advocating with relevant government departments and agencies for temporary/crisis, transitional and/or longer-term accommodation to be provided within redundant and vacant publicly-owned buildings, and/or those awaiting decisions regarding sale and redevelopment ('meantime use'), noting that a range of sites were raised during consultations on the strategy including the former Bega Hospital sites/building, the former St Joseph's Catholic School in Eden, the Roy Wotton facility in Eden, vacant or soon to be redundant motels in the LGA.

- b. Investigating and advocating for the use of vacant and underutilised publicly owned land for the development of an affordable MHE, including placement of smaller manufactured homes, managed by a local CHP or NFP
- c. Consulting with private caravan park owners to allow vans being used for short-term or crisis accommodation to remain longer than the existing three month limit
- d. Investigating and implementing 'pop up' models of crisis or short-term accommodation, for example, a 'Winter Sleep-In' pilot in community or church halls, with appropriate regulatory flexibility
- e. Reviewing relevant planning legislation and controls with a view to ensuring that developments similar to the Gosford Tiny Homes Foundation project can be undertaken in the Bega Valley Shire
- f. Providing active planning and resourcing support to relevant NFPs or CHPs seeking to engage in adaptive reuse of existing facilities and/or place MHs/tiny homes on Council or other publicly owned or philanthropic vacant land, including fast tracking applications, potential advice or flexibility with regard to standards, etc
- g. Seeking to obtain NSW Government agreement and funding to renovate existing dwellings that are currently vacant or in poor repair for 'meantime' use or short to medium-term accommodation, managed by a CHP or NFP provider
- h. Developing an awareness campaign on the nature and extent of the increasing homelessness in the LGA in conjunction with relevant NFPs and community networks so as to remove discrimination and increase public awareness of the issues, including among developers, real estate agents and the wider community.

### 2.3.3 Brokerage

#### Rationale

A very high proportion of people in housing stress are living in lone person households, noting that there is a serious undersupply of Boarding Houses, studio and one-bedroom apartments to meet needs of students, single low-income workers, tertiary students and the growing number of people at risk of homelessness.

The seriousness of this issue was highlighted during consultations in the preparation of this strategy, where a number of industry representatives also noted that they had lost or failed to attract staff because of the almost total lack of suitable private rental accommodation.

At the same time, a relatively high proportion of larger homes are occupied by only one or two people, with growing social isolation also reported to be a problem among older people and those whose family circumstances have changed through divorce or adult children leaving home.

## Strategies

### Strategy 6

- a. Council, in partnership with a local Community Housing Provider or NFP, seek to facilitate a pilot brokerage scheme that matches suitable home owners in larger, underoccupied dwellings with suitable tenants/lodgers, including people [at risk of homelessness and key workers](#), including:
  - i. Screening and matching of prospective shared housing participants;
  - ii. Development of appropriate rents, cost sharing agreements, and other administrative arrangements;
  - iii. Provision for support, conflict resolution, etc as required.

## 2.3.4 Facilitative strategies and mechanisms

### 2.3.4.1 Removing planning impediments to increase market supply of affordable and lower cost housing through the market

#### Rationale

Given the likelihood that around 70% of affordable housing need will be for smaller (lone person and couple only) households by 2036, there would be a significant benefit in actively increasing the supply of smaller studio, one and two bedroom apartments near major town centres, as well as from developing a supply of well-located New Generation Boarding Houses through this strategy. The ongoing aging of the population, the fact that 60% of apartments in Residential flat buildings are likely to enter the rental market, and the affordability of studio and one bedroom apartments to some low income households also provides a strong rationale for this strategy.

This has implications for zoning and planning controls, particularly in certain locations and/or precincts. A preliminary audit of local planning instruments as well as JSA's economic analysis indicates that there are some significant barriers and opportunities to the creation of well located, affordable housing products through the market, particularly smaller strata dwellings close to the town centres of Bega, Eden and Merimbula, which have the advantage of also being cheaper areas.

B4 and R3 zoning in *Bega Valley Local Environmental Plan 2013* provides opportunities for development of Residential flat buildings and Multi dwelling housing; however, some controls are likely to provide a significant constraint to their development and should be amended.

It is understood that Council officers are currently undertaking a review of relevant planning controls, and that a number of the findings from JSA's review are already in train and/or supported by Council's internal review.

## Strategies

### Strategy 7

Council will open up opportunities through the market for an increase in the supply of well-located smaller strata dwellings (Residential flat buildings and Multi dwelling housing) through relevant amendments to its environmental planning instruments.

- a. Council will seek to amend *Bega Valley Local Environmental Plan 2013* as follows:



- i. Delete the requirement for 250 m<sup>2</sup> of site area per dwelling for RFBs and MDH in R2, R3 and B4 zones;
  - i. Restrict the development of single dwelling houses and dual occupancies on R3 and B4 zoned land to encourage appropriate dwelling types and densities.
  - ii. Allowing Multi dwelling housing in R2 zoning, with appropriate DCP controls to increase housing diversity and affordability.
- b. Council will seek to amend *Bega Valley Development Control Plan 2013* as follows:
- i. Amend provisions for Residential flat buildings to match the Apartment Design Guide setback requirements rather than controls likely to be a significant constraint on development of smaller strata dwellings, noting that currently each dwelling at ground level must provide 50 m<sup>2</sup> of private outdoor space and each other dwelling must have 20 m<sup>2</sup> of communal open space;
  - ii. Amend parking requirements for Multi dwelling housing, Residential flat buildings and Shop top housing within 600 metres walking distance via a Council road or pathway of B2 zones in the town centres of Bega, Eden and Merimbula to reflect actual car ownership rates, and to provide an incentive for development of one bedroom apartments, that is, to 0.5 spaces for one bedroom apartments, 1 space for two bedroom apartments and 1.5 spaces for three bedroom apartments.
- c. With regard to zoning, Council will consider:
- i. Ensuring that sufficient re/developable land in and around centres is zoned B4 and R3 to facilitate construction of Residential Flat Buildings, particularly in areas of existing/older separate housing.
- d. With regard to Height and FSR, Council will consider:
- i. Amending controls on R3 zoned land within 600 metres of the B2 zone within the town centres of Bega, Eden and Merimbula, to align with Height and FSR in B4 zoned areas;
  - ii. Increasing Height in B2 zones by an equivalent of one storey, which may improve the viability of Shop top housing development.

#### **2.3.4.2 Encouraging and prioritising Affordable Housing Developments**

##### **Rationale**

A frequent theme in submission to the exhibition of the draft *Affordable Housing Strategy* was the need to give priority to development proposals that are able to demonstrate they can provide a reasonable proportion of genuinely affordable housing in accordance with benchmarks in Table 2.1 of this *strategy*, including by private and community sector proponents. The need to provide guidance and support to private developers, CHPs and NFPs, and to local philanthropists in affordable housing benchmarks, models, planning and development was also noted in a number of submissions.

### **Strategy 8**

Council will seek to encourage and prioritise development of 'affordable housing' development in accordance with benchmarks in Table 2.1 through:

- a. Developing internal processes that can fast track or prioritise 'affordable housing' developments by private, public and/or community sector/NFP proponents;
- b. Ensuring that this process is applied to those providing genuinely 'affordable housing', for the purpose of Strategy 8 being housing that will be available for rent at the benchmarks in Table 2.1 and that will be undertaken and/or managed by social (community or public) housing providers, NFPs including Aboriginal organisations, and/or private developers who have entered into an MOU or similar to provide a reasonable proportion of a development as 'affordable rental housing' to be managed by a social housing provider or other NFP for not less than 10 years (ongoing);
- c. Providing advice and support on relevant aspects of affordable housing policy, models, planning and development, including on its website and through dedicated/trained Council staff;
- d. Actively linking potential private sector developers, CHPs/NFPs and philanthropists, for example, in the development of New Generation Boarding House development/management partnerships/demonstration projects.

#### **2.3.4.3 Increasing opportunities for housing diversity and affordability in greenfield areas**

##### **Rationale**

JSA's regression analysis indicates that the development of vacant land in Bega locality, and to a lesser extent in Eden, Merimbula and Pambula localities, is likely to contribute to the supply of affordable housing for some groups, with entry level project homes (smaller, with less parking and only one bathroom, etc) just affordable to some low income households and to all moderate income households.

JSA's affordability analysis also indicates that moderate income families would benefit from an increase in the supply of smaller three bedroom apartments with one bathroom, as well as entry level two and three bedroom project homes or villas in areas around Bega, Eden and Merimbula in particular.

Alternative housing options such as housing co-operatives, land trust models and multi-generational housing should also be explored and facilitated where beneficial.

##### **Strategies**

##### **Strategy 9**

Council will seek to ensure increased housing diversity and affordability in Greenfield areas and on infill sites through relevant provisions in its environmental planning instruments.

- a. Council will seek to amend *Bega Valley Local Environmental Plan 2013* as follows:
  - i. Provide for a development standard that enables the concurrent construction and subdivision of more than two dwellings at a time in R2 and RU5 zones;

- ii. Allowing for some lots to be smaller than the minimum lot size in Greenfield subdivision to allow for more efficient use of infrastructure.
- b. With regard to zoning, Council will seek to amend Bega Valley Local Environmental Plan 2013 as follows:
- i. Allowing Multi dwelling housing in R2 zones, with appropriate DCP controls;
  - ii. Allowing Multi dwelling housing in suitable areas of the seweraged villages zoned RU5, with appropriate DCP controls, given the variable infrastructure and servicing availability;
  - iii. Zoning Greenfield and Investigation Areas as R1 General Residential to increase housing diversity and affordability.
- c. Council will investigate, and where relevant support, alternative housing models on greenfield sites and/or rural zoned land with CHPs and NFPs including Aboriginal agencies and networks, including:
- i. housing co-operatives;
  - ii. community land trusts;
  - iii. multi-generational housing forms; and
  - iv. other more flexible living arrangements on rural zoned land such as ‘sweat equity’ and multiple occupancy developments, including under *SEPP Primary Production 2021* (Schedule 5 Rural Land Sharing Communities).

#### **2.3.4.4 Facilitating increased development of ‘New Generation’ Boarding Houses**

##### **Rationale**

‘New Generation’ Boarding Houses under the Housing *SEPP 2021* can provide affordable accommodation to smaller very low and low income households, and fill an important gap for a range of very low and low income retirees, workers, and other singles and couples. The option to develop New Generation Boarding Houses under SEPPARH is readily available in residential and business zones under the Bega Valley LEP. However, there appears to have been very limited take up by developers or Community Housing Providers to date.

Economic modelling reported in the *Background Report* suggests that these are likely to have a good rate of return, so that increased awareness and promotion of best practice would also likely be beneficial (see also the *Case Study Booklet* for examples of best practice).

Changes under the *Housing SEPP 2021* include a new land use called ‘Co-housing’, which is essentially a privately managed Boarding House, which will no longer automatically be permissible in R2 zones, with zone permissibility at Council’s discretion. Zoning constraints are likely to remove an important supply of one of the only forms of accommodation with the potential to be affordable to some very low income and all low income smaller households. As such, it is important that Council continues to provide for the widest possible permissibility of both Boarding Houses and Co-housing.

## Strategies

### Strategy 10

Council will actively support the development of high quality New Generation Boarding Houses and/or Co-housing through the following actions:

- a. Ensure that New Generation Boarding Houses and/or Co-housing continues to be permissible within all residential and commercial zones where 'Boarding Houses' are currently permissible (that is, in R2, R3, B1, B2, B4 and R5 zones), including following gazettal of *Housing SEPP 2021*;
- b. Actively promote and support the development of high quality, 'New Generation' Boarding Houses (and Co-housing) in locations within 400 metres of B2 or B4 zoning in Bega Valley LGA, including through educational workshops with developers and the community, publication of guidelines, production of promotional material, and favourable consideration of compliant applications.
- c. Consult with major private and public sector employers and tertiary educational institutions about the opportunities provided by New Generation Boarding Houses and/or Co-housing, and promote this form of accommodation as an opportunity to increase flexible, affordable rental to low income workers and students in the LGA.
- d. Consult with DPIE on the development of guidelines to support the development of good design and management of 'New Generation' Boarding Houses taking into account local needs and the housing market context, and make these publicly available (see Outline of Consideration for Guidelines at Attachment A).
- e. Actively link private developers and CHPs with a view to developing local pilot demonstration development management partnership NGBH development.

#### 2.3.4.5 Opening up development opportunities for CVPs and MHEs

##### Rationale

Caravan parks have historically been an important source of affordable accommodation in areas like the Bega Valley Shire, including for lower income families, people on pension and benefits and lower income and seasonal workers.

On-site vans and manufactured homes that can be rented with the site, and sites which are rented where residents place their own home, have the potential to be affordable to all low income households and some very low income households. However, there are limited permanent or long-term sites remaining in privately owned and operated facilities in the LGA through conversion to tourist and short-term uses, and there is reported to be a high demand for such accommodation.

Although short-term sites (3 months or less) may benefit short-term casual workers or more transient people, they will not meet the accommodation needs of lower income working families and workers who are seeking more stable rental accommodation.

There is a need to encourage the development of additional long-term sites within existing facilities, as well as the development of additional privately operated and lower cost manufactured housing estates as a relatively efficient way of providing accommodation for lower income families and workers. There are also opportunities to develop more affordable manufactured housing estates that are owned/managed by Council and/or a registered Community Housing Provider on publicly owned land with favourable rates of return as an example of best practice in this area.

### **Strategy 11**

Council will seek to increase the supply of long-term affordable sites and dwellings in caravan parks and MHEs, including through the following actions:

- a. Council will consult with relevant State Government departments on the development of guidelines to encourage a higher proportion of permanent sites within caravan parks and MHEs that are principally tourist-oriented developments, and provide for a higher proportion of such sites in licensing arrangements;
- b. Council will identify potential sites for additional private caravan parks and manufactured housing estates, and seek to develop private sector investment through appropriate zoning and other supporting planning controls or through planning proposals and/or planning agreements delivering affordable housing as a public benefit.

#### **2.3.4.6 Incentives to enhance opportunities for benefit capture**

##### **Rationale**

Although there are limited opportunities for benefit capture from variations to development controls, there is significant land value uplift associated with rezoning of rural land for residential uses and rezoning of R2 land to zoning that allows higher density uses such as Residential flat buildings and Multi dwelling housing (e.g., R1, B4 and R3 zones).

As well as considering mandatory benefit capture schemes, outlined below, Council should also consider the development of a Planning Agreement Policy to enable benefit capture in relation to Planning Proposals and proposed variations to controls resulting in significant land value uplift.

##### **Strategies**

##### **Strategy 12**

Council will develop a Planning Agreement Policy under section 7.4 of the Act, whereby Council can capture part of the uplift associated with land value uplift arising from Planning Proposals to amend LEP provisions, and/or proposed variations to planning controls. Council will consider two broad approaches:

- a. Conduct economic modelling and set target contribution rates associated with increased height, density or rezoning, and have a preferred rate across precincts/sites; or
- b. Council could calculate value uplift on a case by case basis, and take a reasonable part of the uplift (generally 50% of additional profit) as an affordable housing contribution, either in cash or in kind, noting that this is the preferred method due to the highly differentiated local housing market.

#### **2.3.4.7 Supply issues related to Short Term Rental Accommodation**

##### **Rationale**

##### **Overview**

As noted above and raised in numerous public submissions to the exhibition of the draft *strategy*, a very high rate of local rental accommodation is provided as Short Term Rental

Accommodation (STRA), particularly in some areas of the LGA. This appears to be having a serious adverse impact upon both the supply and cost of rental accommodation in the LGA, and has been exacerbated by increased demand for regional living and domestic holidays during the Covid-19 period. It is important that Council seeks to address this through any mechanisms available to it.

### **Amendments to State Environmental Planning Policy (Housing) 2021**

The NSW Government policy for STRA is included in the Housing SEPP 2021. The state-wide policy makes STRA exempt development in dwellings and overrides any controls in local planning instruments or policies including the *Bega Valley Local Environmental Plan 2013*.

Therefore, the most effective strategy to address this issue of considerable community concern is likely to be through seeking amendments to the Housing SEPP 2021 that prohibit STRA in the R2 Low Density Residential zone. This will require ministerial approval, and is likely to require strong justification with regard to an assessment of the social and economic impacts of the existing STRA (see also below).

### **Strategy 13**

Council will implement Recommendation 5.2 from the Regional Housing Taskforce Recommendations report in relation to STRA.

### **NSW Housing SEPP 2021**

STRA is addressed in Part 6 of the Housing SEPP 2021). STRA is defined as a dwelling used by the host to provide accommodation in the dwelling on a commercial basis for a temporary or short-term period.

The Housing SEPP 2021 provides for hosted STRA (where the host resides on the premises during the provision of accommodation) to be exempt development subject to meeting general requirements. For non-hosted STRA in prescribed areas, development for STRA is exempt so long as the dwelling is not used for STRA for more than 180 days in a 365 day period. This may be a disincentive to use of dwellings for STRA if the net returns from rental under a residential tenancy agreement (RTA) exceed returns from STRA, however does not preclude the circumstance where, for example, a dwelling is rented for a six month lease during the “off season” and rented as STRA at other times.

Currently Bega Valley Shire is not included in the prescribed area, so there are no constraints on the use of dwellings in the Bega Valley LGA for STRA provided they meet the general requirements.

DPE created a Socio-Economic Impact Assessment template for councils to use to measure the impacts of STRA on their local areas after the implementation of the new STRA policy.

### **Strategy 14**

In the medium-term (once the significant local impacts of COVID have ceased), Council will undertake a socio-economic impact assessment of the impacts of STRA in the Bega Valley Shire, with the purpose of reviewing whether it is appropriate to limit or restrict STRA in certain locations, and request inclusion in the Housing SEPP 2021 as a “prescribed area”. Consideration could also be given to gaining approval for a shorter time, such as 90 days in a 365 day period.

### **Regional Housing Taskforce**

It is also noted that Recommendation 5.2 from the *Regional Housing Taskforce Recommendations* report is to review the short- and longer-term impacts on regional housing

outcomes of recent and planned reforms, such as the Housing SEPP 2021, Design and Place SEPP 2021, infrastructure contributions reform and the regulation of Short Term Rental Accommodation.

#### **Other incentives**

Council may have opportunities to provide rate rebates and waiving of other fees and charges for dwellings used for permanent rental accommodation in selected areas, however this will result in a loss of income to Council. Rate rebates and other waivers may tip the balance between the use of a dwelling for STRA or for permanent rental under a RTA.

#### **Strategy 15**

Council will consider opportunities for rate rebates and waiving of other relevant fees and charges for permanent rental accommodation to encourage long-term rental accommodation.

#### **Secondary dwellings**

It may be possible to impose a condition with development consent for secondary dwellings and other dwellings preventing use of the secondary dwelling for short term rental accommodation. We understand that Byron Shire Council had a similar provision between 2011 and 2019.

#### **Strategy 16**

Council will consider opportunities for conditions of consent on secondary dwellings to constrain use of these dwellings as STRA.

### **2.3.5 Mandatory planning strategies**

#### **2.3.5.1 Develop an affordable housing contributions scheme**

##### **Rationale**

*Housing SEPP 2021 (Affordable Housing)* now covers all of NSW, and allows mandatory contributions toward affordable housing where need and economic viability can be demonstrated in accordance with DPE Guidelines, which ensures that such schemes will only be implemented where they will not economically constrain development. Based on economic analysis reported in Section 5.4.3 and Appendix C of the *Background Report*, there is likely to be sufficient land value uplift to justify a Housing SEPP 2021 Affordable Housing Contribution Scheme in relation to:

- Rezoning of R2 land in Bega to zoning that allows Multi dwelling housing and Residential flat buildings (to R1, R3 and B4); and
- Rezoning of R2 land in Eden to allow Multi dwelling housing and Residential flat buildings (R1, R3 and B4).
- It is also likely that upzoning of rural to residential uses in some higher value coastal areas will result in sufficient land value uplift for inclusion in a Housing SEPP 2021 scheme; however, this would need to be further explored.



## Strategies

### Strategy 17

Council notes the preliminary economic analysis in the of the *Background Report*, and consider the development of a Housing SEPP 2021 Affordable Housing Contributions Scheme, specifically:

- a. In conjunction with any proposed rezoning, as outlined above, conduct further detailed investigations into the viability of a Housing SEPP 2021 Affordable Housing Contributions Scheme, noting that need and viability requirements are likely to be met on preliminary investigations.

### 2.3.5.2 Mandate housing diversity

#### Rationale

Mandating housing diversity is likely to be an effective mechanism for creation of affordable housing in the Bega Valley Shire context. This will be equitable where the mandating of such dwellings does not constitute an undue impost on the viability development.

#### Strategies

### Strategy 18

Council will mandate housing diversity in well-located areas, including:

- a. Mandating a proportion of dwellings in Shop top housing and Residential Flat Buildings within 400 metres of Bega, Eden and Merimbula B2 zones, and other town centres as appropriate, as smaller one bedroom and two bedroom apartments (sizes no more than 5 m<sup>2</sup> above the minimums in the Apartment Design Guide), with one bathroom and reduced parking requirements.
- b. This will include at least 20% of dwellings as one bedroom apartments in developments of 5 or more dwellings with the number rounded up; and at least 20% as two bedroom apartments in developments of 5 or more dwellings with the number rounded up.

## 2.3.6 Direct creation of affordable housing

### 2.3.6.1 Overview

As well as the creation of affordable (including social) housing through a Housing SEPP 2021 Affordable Housing Contribution Scheme, the main way that most very low income and many low income renting households can be affordably accommodated in the Bega Valley Shire is through the direct creation of affordable rental housing through government funding for social housing; the use of Council and other public or community owned land in affordable housing developments and partnerships; more efficient use of existing social housing including selective redevelopment of older houses on large lots to provide increased diversity and address underoccupancy and long waiting times for smaller dwellings; and supporting local Aboriginal organisations to develop appropriate housing models on freehold or Crown Land.

### 2.3.6.2 Creation of affordable housing on Council and other public land

#### Rationale

The direct creation of affordable rental housing in perpetuity on Council and other publicly owned land is one of the most effective strategies for creating affordable housing for very low and many low income renting households in need. Such households are largely excluded from the private market, and often in severe housing stress and at risk of homelessness.

This land can be developed under a variety of contractual arrangements, for example, by Council directly developing the land and contracting in the skills required, or in partnership with a Community Housing Provider (CHP), other Not for Profit and/or private sector developer. Management would normally be undertaken by a CHP with expertise in this area. Financially, the arrangement can be structured in a number of ways, depending on Council's preference. Likewise, risk can be shared in a manner appropriate to the needs and preferences of partnering agencies.

The development of affordable housing partnerships on Council- and other publicly-owned land is discussed in detail in Section 5.5.3 and Appendix B of the *Background Report*; and examples are provided in the Case Study Booklet (Attachment A to the *Background Report*). JSA conducted preliminary modelling and ranking on a number of potential Council sites including on vacant and underutilised land under a number of development scenarios. This preliminary assessment finds that a number of indicative developments on Council and other Government owned land are likely to be economically feasible (that is, income would exceed costs at year one), including:

- Community/publicly owned and managed MHE or caravan park;
- Affordable seniors' development with smaller rented units;
- A multi-tenure Residential flat building including a proportion of sales, social and affordable (discount market) rental;
- A multi-tenure Multi dwelling housing development including sales, social and affordable (discount market) rental;
- A New Generation Boarding House including social and affordable (discount market) rental, including as a standalone development or as part of a multi-tenure development.

#### Strategies

##### Strategy 19

- a. Council will seek to identify and dedicate at least four Council-owned sites for the purpose of affordable housing partnerships as the *strategy* is rolled out, ensuring that sites are:
  - well located with regard to transport and/or services;
  - maximise the yield of social and affordable rental housing;
  - are multi-tenure developments; and
  - are able to achieve favourable economics (at least break even in the first year).
- b. Council note that a list of sites ranked in order from most to least favourable for development is provided at Appendix B of the *Background Report*, but that other sites may become redundant or otherwise available over the life of the *strategy* (for

example, well-located car parks, where councils have constructed affordable housing in the 'airspace' above, whilst retaining car parking);

- c. As set out below in more detail, the developments on Council-owned land will include:
  - a. An affordable caravan park or MHE;
  - b. Two multi-tenure development targeting smaller households, with a mixture of studios or New Generation Boarding House/Co-housing rooms; one and two bedroom apartments at social and affordable rents, and purchase by low income people including shared equity arrangements;
  - c. An affordable seniors' development.

#### **Strategy 20**

- a. Council will seek to facilitate the development of an affordable caravan park /manufactured housing estate in partnership with a registered Community Housing Provider or other Not for Profit on Council-owned land demonstrating best practice in the development and management of affordable MHEs, including that:
  - i. The development is mixed tenure, and allows for the rental of sites with owner occupied homes (owner-renters), as well as the rental of both manufactured homes and sites (renter-renters);
  - ii. Rents of sites and sites with homes are affordable to a mixture of very low and low income households.

#### **Strategy 21**

- a. Council will seek to facilitate a multi-tenure development on Council-owned land within or in close proximity to Bega, Eden, Pambula or Merimbula town centre in partnership with a registered Community Housing Provider (CHP) and/or other Not For Profit (NFP) service provider in the short-term.
- b. This development will be a multi-tenure development and will be targeted to very low and low income renting households and to low income purchasing households, and will seek to include:
  - A portion of dwellings as a New Generation Boarding House/Co-housing providing rental accommodation to very low income renting lone person or couple households;
  - One and two bedroom apartments providing affordable accommodation to very low income and low income renters who are older people, lone person, couple and smaller family households;
  - Up to one-third of apartments available for purchase by low income households, possibly including some shared equity purchase with the equity partner being a CHP;
  - Adequate provision for Adaptable Dwellings per AS 4299.
- c. Council will seek to develop the site through a competitive tendering process (an expression of interest) or preferred partnering arrangement with a registered CHP that clearly specifies requirements for the site including maximisation of affordable rental

housing yield, indicative dwelling type and tenure mix, risk apportionment and long-term management and maintenance arrangements.

### **Strategy 22**

- a. Council will seek to dedicate two further sites to multi-tenure affordable housing development within or in close proximity to Bega, Eden, Pambula or Merimbula town centres.
- b. The other two Council sites will be identified by Council, and likewise be developed in partnership with a registered CHP and/or appropriate NFP under an EOI or preferred partnering arrangement per Strategy 15 above.
- c. One of these developments will be an affordable seniors' development, with studio and one bedroom apartments affordable to older people and those with a disability on pensions and benefits.

### **Strategy 23**

Council will continue discussions with NSW Government authorities that were commenced during the preparation of this strategy with regard to developing a Register of Public Land that can be made available for additional affordable housing partnership developments, such as those outlined in Strategies 15-17 above, including:

- a. An assessment of the suitability and ranking of public land on this Register with regard to locational criteria and constraints, and identification of at least three suitable sites for affordable housing developments;
- b. Zoning and controls required to facilitate development;
- c. Preliminary assessment of economic feasibility and anticipated yield;
- d. Development of an appropriate mechanism for development and/or dedication of land or dwellings, which may include:
  - i. Partnership development with a Community Housing Provider, with land dedicated free of charge or with value recouped through sale of some dwellings; and/or
  - ii. Development of a Planning Agreement to provide for dedication of a reasonable proportion of dwellings as affordable rental housing; and/or
  - iii. a Housing SEPP 2021 Affordable Housing Contribution Scheme if preferred and/or to accompany the lodgement of a Planning Proposal for rezoning of the land.
- e. Of these three developments on other publicly-owned land, Council seek to will give priority to:
  - i. An affordable MHE with mixture of owner-renters and renter-renters per strategy 14 above;
  - ii. A well-located multi-tenure development; and affordable seniors' development per Strategies 16 and 17 above.

### 2.3.6.3 Selective redevelopment of older public housing properties

#### Rationale

There are opportunities to selectively redevelop older, under-occupied social housing on larger lots closer to town centres, which is currently being explored by Council with NSW Land and Housing Corporation and other State Government Authorities as part of the development of this strategy. The replacement of older, under-occupied separate houses with new mixed tenure developments including strata dwellings can better meet the need for smaller social housing dwellings, and also provide affordable rental and purchase housing for low income workers, whilst retaining a reasonable component of houses suitable for families.

It is noted that the longest waiting times on the NSW social housing waiting list are for one and two bedroom apartments (5-10 years) in the Bega Valley Shire allocation zone; and 10+ years for a one bedroom apartment in the Eden allocation zone, although in the latter it is also noted that 4+ bedroom homes have a 5-10 year waiting time.

Regeneration and/or upgrade of older social housing is in line with current State Government policy directions to improve the quality of life and standard of housing in areas with large concentrations of public housing, and with Government priorities to increase the capacity and economic viability of Community Housing Providers through the transfer public housing on long-term leases. This enables providers to borrow against the asset to enable redevelopment, which is occurring other parts of the State. To date, no such scheme has been announced for Bega Valley LGA.

Opportunities for selective redevelopment of older public housing stock close to the town centre are being explored by Council at the time of writing.

#### Strategies

##### Strategy 24

Council will seek to ensure that there is an increase in appropriate social housing dwellings to meet existing and projected needs, and to ensure the long-term viability of such housing stock, including through:

- a. Continuing to explore opportunities with NSW Land and Housing Corporation, DCJ and local Community Housing Providers for the selective redevelopment of older concentrations of social housing in Bega and Eden (see Section 1.27 Appendix B of *Background Report* for list of sites), including for smaller, more diverse housing types and multi-tenure development including social, affordable and private market housing to meet changing needs;
- b. Ensuring that there is not net loss of social housing dwellings as a result of any regeneration activities;
- c. Advocating to State Government on behalf of local Community Housing Providers (CHPs) for a transfer or title and/or long-term (50-year lease) on existing public housing on contiguous sites in appropriate areas to facilitate the redevelopment of selected stock through increased economic viability for CHPs;
- d. Reviewing zoning and controls in precincts targeted for estate regeneration or selective redevelopment to support density;

- e. Seeking to ensure that senior Council staff are included in planning, round-table discussions and/or negotiations with relevant government departments on decisions affecting the supply of affordable (including social) housing;
- f. Seeking to obtain NSW Government agreement and funding to renovate existing dwellings that are currently vacant or in poor repair for 'meantime' use or short to medium-term accommodation, managed by a CHP or NFP provider.

#### **2.3.6.4 Development of culturally appropriate affordable housing for Aboriginal people**

##### **Rationale**

Aboriginal families and communities often experience particular housing needs associated with demography, household size and structure, cultural needs and issues, family connections and obligations, low rates of home ownership, and additional barriers to accessing the private rental market such as racial discrimination.

Consultations with local Aboriginal services, networks and local land councils during the preparation of this strategy indicate that the housing situation of many Aboriginal people in the LGA is seriously inadequate, and has worsened significantly since the Covid 19 pandemic. This includes severe overcrowding due to family members returning to the LGA, and the lack of private rental accommodation and related issues; lack of smaller (studio, one and two bedroom) dwellings for rent in the private or social rental sectors; poor repair and/or condition of some larger family accommodation; insufficient larger social rental dwellings for large, multi-generational families; and the lack of a pathway out of social housing for community members who have sufficient income to repay a mortgage but lack a deposit or access to conventional finance.

There are also reported to be increasing social issues when a family member struggling with mental health or substance abuse moves in with more vulnerable family members, and no alternative for such family members to access independent accommodation suited to their needs. Other issues raised related to the lack of smaller, affordable seniors' accommodation so that older people have the choice to live independently from other family members. Other issues raised related to the lack of culturally appropriate options for accommodation that allow elders to age in place and provides them with a choice to live independently near other family members, and also to free up larger homes for families with children.

This often results in high levels of personal stress; increased vulnerability for some members of the community; increased levels of severe overcrowding; exacerbation of existing physical and mental health issues; and reduced wellbeing and independence that comes with access to secure, appropriate housing, as well as to home ownership for some community members who wish to enter this tenure form.

There are additional complexities for local Aboriginal organisations in terms of lack of access to resources, staffing and expertise to carry out planning, feasibility analysis and development on freehold land; as well as constraints on the development of land that is currently subject to protracted Native Title Claims that are understood to include much of the Crown Land in the Shire.

Land currently being handed back to Aboriginal people is generally significantly constrained, quite apart from the substantial Native Title issues that prevent LALCs from developing land. The other issues include biodiversity, topography and land use zoning (non-residential zones)

of land being handed back by Crown Lands. It is reported to leave LALCs with land that they must manage with regard to pests, weed and fire mitigation, without the capacity or funding to do so.

It is understood that Council has commenced discussions regarding the potential for local Aboriginal organisations to facilitate or undertake development on such land to benefit their community. It is important that Council support and help to facilitate tangible outcomes to increase access to appropriate, secure and diverse housing options for local Aboriginal people, and actively support communities in addressing long-term structural inequalities in relation to meeting their housing needs.

## **Strategies**

### **Strategy 25**

Council support and help to facilitate tangible outcomes to increase access to appropriate, secure and diverse housing options for local Aboriginal people, and actively support communities in addressing long-term structural inequalities in relation to meeting their housing needs, including through:

- a) Working with Local Aboriginal Land Councils (LALCs) to identify suitable Crown Land that is capable of being rezoned prior to land being handed back to ensure effort is directed to feasible sites;
- b) Providing Aboriginal organisations with an interest in progressing demonstration projects on freehold or Crown Land with resources to assist with town planning, feasibility analysis and development;
- c) Facilitating discussions between Aboriginal organisations and relevant Government authorities to identify and gain access to/gain consent in relation to such demonstration projects;
- d) Investigating whether a local Community Housing Provider may also be a beneficial partner in the provision of culturally appropriate housing for Aboriginal people, given the likelihood that their waiting list will have a reasonable proportion of Aboriginal applicants;
- e) Providing a dedicated resource within Council for Aboriginal organisations to provide planning support and analysis;
- f) Consider fee waivers in relation to development applications by Aboriginal organisations;
- g) Advocating on behalf of Aboriginal housing providers with state government agencies including Land and Housing Corporation and the Aboriginal Housing Office for improved maintenance of existing stock to bring it up to a habitable standard; and the co-design with Aboriginal communities of new housing to ensure cultural appropriateness of future accommodation;
- h) Assist Aboriginal communities and organisations to conduct a more detailed housing needs analysis in relation to issues outlined above, including the following options:
  - i. Co-design of culturally appropriate housing location, forms and configuration;



- ii. Affordable, well-located seniors' accommodation;
- iii. Affordable accommodation for single people/smaller households, including those with more complex needs;
- iv. Micro-housing clusters, and other innovative solutions;
- v. Potential for other more flexible living arrangement on large lots and/or rural zoned land such as 'sweat equity' and multiple occupancy developments, including under *SEPP Primary Production 2021* (Schedule 5 Rural Land Sharing Communities).
- vi. Shared equity pilot scheme to support affordable home ownership and/or development as part of a land trust model or MHE (where the home is owned and the land held under shared or community title);
- vii. Improved maintenance, upgrade and/or regeneration of existing larger social housing dwellings; and examining the potential for secondary dwellings and/or dual occupancies on larger/consolidated lots;
- viii. Other housing provision in accordance with needs identified in close consultation with Aboriginal communities and organisations.

### **2.3.7 Administration and maintenance**

#### **2.3.7.1 Administration**

##### **Rationale**

There is a need for transparent reporting and accountability with regard to administration of Council's affordable housing program, and to ensure that the *strategy* is effective in achieving its objectives. Adequate responsive, recurrent and planned maintenance is also vital to ensure the amenity of the properties and locality, and the longevity of stock.

##### **Strategy 26**

Council will establish required administrative mechanisms to ensure proper monitoring, management and administration related to the *strategy*, and any Affordable Housing Program resulting from this, including:

- Annual reporting against KPIs;
- Transparent processes for the selection of affordable housing partners, whether on the basis of competitive tendering on individual projects, or a preferred partner basis;
- The establishment of a separately accounted and reported Affordable Housing Trust Fund to hold any resources generated through the *strategy* (for example, affordable housing units created in perpetuity).

#### **2.3.7.2 Asset maintenance**

##### **Rationale**

Adequate provision for responsive, recurrent and planned maintenance is also vital to ensure the amenity of the properties and locality, and the longevity of stock.

**Strategy 27**

Council will ensure that partnering and management arrangements with a registered community housing provider include adequate budgetary provision and planning for maintenance and facilities management including:

- Responsive maintenance within the required timeframe;
- Recurrent maintenance, such as minor works, gardening, etc to ensure high quality amenity; and
- Planned maintenance, such as external painting, roof and fence replacement, including a planned maintenance schedule and regular asset condition audits.

# Attachment A

## Outline of Consideration for Guidelines for New Generation Boarding Houses

Guidelines would include the following types of provisions:

- Need for consistency with 'local character', including guidance from Council
- Amenity of rooms, including passive solar access, ventilation, storage, and preferred provision of self-contained kitchen that is well-equipped (e.g. with two burners, oven, microwave, sink and small fridge), and of ensuite bathroom;
- Amenity of outdoor open space, including all weather cover, seating and tables, attractive landscaping, etc);
- Shared ('private') open space be provided at 5m<sup>2</sup> for each ten lodgers, with a minimum of 20m<sup>2</sup> for any Boarding House development
- Where boarding rooms are not fully self-contained (with ensuite bathroom, laundry and kitchen facilities), at least the following criteria will be considered adequate):
  - The communal kitchen and dining area is to be a minimum of 15m<sup>2</sup>, with at least 1m<sup>2</sup> per lodger over 6 lodgers
  - One washing machine and tub should be provided for every 10 lodgers
  - One clothes drier or 20m of external line should be provided for every 10 lodgers
  - Bathrooms must be at least 5m<sup>2</sup> and comply with BCA requirements.

A Plan of Management should be provided which addresses:

- Fees for residency
- Management and supervision through an on-site manager or regular visits
- Kitchen usage, the provision of meals or resident provision of meals
- Noise inside the boarding house and in adjacent private open space areas
- Use of communal space and facilities
- Parking for cars
- Cleanliness and maintenance of the property and grounds
- House rules (covering issues such as access to rooms, keeping shared facilities clean and tidy, visitors, pets, quiet enjoyment etc)
- 24 hour contact details
- Conflict resolution procedures
- Complaints management, report back and accountability procedures in relation to adjoining resident



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