

# **Draft Greater Sydney Region Plan**

Submission\_id: 31147

Date of Lodgment: 11 Dec 2017

Origin of Submission: Email

Organisation name: Homelessness NSW

Organisation type: Community Group

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Suburb: 2011

Submission content: See Attached

Number of attachments: 1

CASA Coalition for Appropriate Supported  
Accommodation

Marrickville Metro 2204

11 December 2017

Greater Sydney Commission  
PO Box 257  
Parramatta NSW 2124

Dear Commissioners

We welcome the opportunity to make a submission on the Draft Greater Sydney Region Plan and revised District Plans. CASA wants to work constructively with the Commission and the NSW Government to help shape an inclusive vision for our city.

Our organisation supports the Sydney Alliance submission along with more than 40 faiths, community, union, and educational member organisations who continues to advocate strongly for the adoption of effective targets for affordable rentals in new developments.

Over the past twelve months, we and the Sydney Alliance and its members have actively engaged with the Greater Sydney Commission (GSC) and its plans. We have campaigned for an inclusive, sustainable and just city where everyone has a place to call home. We have organised public events across Greater Sydney, attended public consultations organised by the GSC, signed petitions for more affordable housing and engaged with the Commissioners and the GSC staff throughout the initial exhibition period for the draft District Plans and *Towards Our Greater Sydney*.

While we hope that we have been heard, we are still confronted by targets that are by all accounts are too low to put a real dent in the growing and urgent need for affordable housing and there is no clear timetable for their introduction.

As we pass the one year anniversary of the release of *Towards Our Greater Sydney*, the GSC and the NSW Government we are still without projections for the future of social and affordable rental housing. The GSC has not proposed any overall numerical targets for the supply of affordable housing in each of the three cities (Greater Parramatta, Harbour CBD, Western Sydney) of our future metropolis and has not modified the plans for 5-10% affordable rental housing targets.

We recognise that the GSC alone cannot solve the affordable housing crisis - a whole-of-NSW Government approach is crucially needed. The Greater Sydney Region Plan does enumerate a number of current and proposed policies across the housing continuum. However, it remains unclear whether the combination of these disparate measures is commensurate with projected needs.

We with the Sydney Alliance will continue to campaign for the NSW and local governments to adopt meaningful and effective targets for affordable rentals in new developments. There is simply not enough housing that is affordable for people on low to moderate incomes – housing that is also stable, well-located (close to jobs, public transport, educational, health and other services), appropriate (for family size, disability, ageing, cultural and other needs), safe and enabling.

We welcome the Commission's support for measures that would improve tenants' security of tenure and make renting fairer through improvements to the laws governing standard tenancy arrangements such as eliminating no-cause evictions.

We also welcome the collaboration and steps to make better connections between planning for the *Greater Sydney Region Plan* and the NSW Government's vision for metropolitan transport planning *Future Transport 2056*.

Our submission focusses on a set of the key recommendations for the Affordable Rental Housing Target (ARHT) scheme and includes a rationale for each of our recommendations.

The recommendations reflect the urgent housing need right across Sydney, the vast scale of the task of providing a home for everybody struggling to rent in the most unaffordable city in Australia, and the need for enduring solutions that keep people well housed and out of homelessness.

They also reflect how the debate has moved forward since our last submission to the Commission in March 2017 and that since then the case for affordable rental housing targets has built momentum. While we acknowledge some helpful changes have been made in this process, we are greatly concerned that three key issues highlighted in our first submission still remain and require a much stronger response:

- 1. Greater commitment to Affordable Rental Housing**
- 2. Transparent accountability**
- 3. Fairer access to Affordable Rental Housing**

This submission draws primarily on the data and information provided in the Greater Sydney Regional Plan itself and the Commission's associated documents to support our case.

To truly represent the values and provide an inclusive vision of the people of Sydney the following recommendations are made for ARHT proposed in the draft Greater Sydney Region Plan and the revised District Plans.

## **10 Key Recommendations**

### **Greater commitment to Affordable Rental Housing**

#### *Recommendation 1*

Higher targets are adopted for ARHT with 15% target on private land and 30% on public land to help meet the large unmet housing need for affordable rental housing across the Districts. These targets should apply to the whole of the development not just to the uplift.

#### *Recommendation 2*

The target set for a specific area undergoing upzoning or rezoning within a precinct should maximise the amount of affordable rental housing produced, factoring in both the type of landowner and the density increase proposed for the specific area ahead of, or accompanying, the rezoning approval.

#### *Recommendation 3*

Housing supply targets for LGAs include indicative numerical 10-year supply targets for affordable rental housing agreed by councils, based upon each council's housing need study of their existing and future residents.

#### *Recommendation 4*

Affordable Rental Housing Targets, while specified for areas undergoing redevelopment, are not limited to defined precincts but apply to all land zoned for residential or mixed use across Greater Sydney. As a general rule, the targets should apply to land rezoned after the Region Plan's commencement of date, first through Voluntary Planning Agreements or other mechanisms, and then incorporated into Local Environmental Plans as they are made.

### **Transparent accountability**

#### *Recommendation 5*

Affordable rental housing is provided in perpetuity and be owned and managed by registered Community Housing Providers to ensure effective targeting of assistance and a continuing high standard of service.

#### *Recommendation 6*

The provision of affordable rental housing on State and Commonwealth government owned land is made mandatory for government agencies disposing or developing surplus land for residential or mixed-use projects to complement requirements on private developers to address affordable rental housing targets.

*Recommendation 7*

The proposed development feasibility testing, assumptions and exemptions are shared with the public and incorporate business tested risk return margins that meet community expectations. Exemptions to targets are to involve independent adjudication.

**Fairer access to Affordable Rental Housing**

*Recommendation 8*

All affordable rental housing is constructed to universal design standards, which include space and liveability criteria, to ensure our most vulnerable community members current and future housing needs.

*Recommendation 9*

Affordable rental housing will be let at an affordable rent, of up to 30% of household income. Affordable Rental Housing Targets schemes which provide housing in perpetuity should be given preference over policies that only produce time limited affordable rental housing outcomes.

*Recommendation 10*

Affordable rental housing eligibility should be extended to moderate income households who are in demonstrable housing stress in the private rental market consistent with existing provisions of SEPP 70.

We and the Sydney Alliance have always endeavoured to work constructively with business, government, community and workers to find and implement solutions that advance the common good. In that spirit, we ask that you consider increased, accountable and consistent inclusionary zoning as part of the Greater Sydney Region Plan and revised District Plans to address the housing crisis and inequality in Sydney. But we also ask that this and other housing and transport decisions be considered within a broader moral vision of justice and an abiding ethic of working for the common good of all.

A Sydney truly governed by the Commission's vision of a sustainable, productive, liveable and community based city will be a city of welcome; a Sydney governed by a vision that tempers economic necessities with realistic but unflinching compassion and fairness will be a world-class city that welcomes all its residents.

We recognise the work you have done, and for the opportunity to respond to the Draft Greater Sydney Region Plan and revised District Plans.

However, because of the urgency of Sydney's housing crisis for so many vulnerable Sydneysiders who rent un-affordably, we hope that the promise of an effective ARHT scheme adopted by the NSW Government is now not far off.

Yours sincerely