



*Property Owners Association of NSW.
Peter Dormia.
Secretary,
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18th July 2019

*City of Canada Bay,
ATT: Strategic Planning,
Locked Bag 1470,
Drummoyne NSW 1470*

Dear General Manager Peter Gainsford,

RE: POANSW submission: Canada Bay Council Local Strategic Planning Statement

POANSW was established in the 1950's and is the peak body that represents boarding House operators in NSW. Boarding houses are the only flexible form of affordable accommodation available in established areas of Sydney. This small supply (there are only about 1000 registered BH in NSW) is critically important source of conveniently positioned housing for essential workers. Without a reasonable supply of flexible and affordable housing, established areas of Sydney will be starved of key workers and service providers, suffocating the functionality of this city.

POANSW supports Canada Bay Local Strategic Planning Statement (LSPS) provisions that will support an increase in the supply affordable housing. They include:

1. The recognition of the rapid and continual expansion of the residential population of inner-metropolitan Sydney, and the increased pressure this will place on the Canada Bay LGA to provide affordable housing, improved social services, and community infrastructure. The LSPS **explicitly** acknowledges that:
 - a. 42% of rental households within the LGA experience housing stress
 - b. The proportion of both young families and older residents (>70 y.o.) will continue to increase, and that development will need to accommodate these demographic changes

- c. the increase in residents who work outside of the local area will require development of better public and active transport options within and between LGAs.
2. the clear and thorough outline of where development will (or will need to) occur, what such development should look like, and how it can be delivered effectively. We appreciate that the LSPS provides a detailed list of **actions** which improve and augment existing plans for development, in particular:
 - a. Action 5.5 (p. 32), requiring a “*minimum of 5% of the Gross Floor Area of new development to be dedicated as affordable housing*”, for all *Planned Precincts* (such as the Rhodes Planned Precinct), *Parramatta Road Corridor* precincts, and in areas where there is “*an increase in density arising from a planning proposal.*” We would like to see this % increased.
 - b. Actions 5.2, 5.4, and 5.6 (p. 32), which note that affordable housing must be diverse and locally integrated, and that various dwelling options such as dual occupancy and terrace housing should be explored.
3. The strong commitment to environmental sustainability, social and cultural diversity, and community welfare and cohesion shown throughout the LSPS.

While this is a strong, detailed proposal, we would like to see language strengthened in relation to several issues experienced by our communities, in particular by:

4. The **explicit** listing of planning mechanisms which can be used to support the delivery of affordable housing dwellings, including:
 - a. S7.11 and S7.12 Contribution Plans;
 - b. SEPP 70/Affordable Housing Contribution Plans (which is outlined in the Local Housing plans).

Though it is noted in Priority 1 (which refers to infrastructure) that amendments to S7.11 and S7.12 Contribution Plans can be used to support the development of local infrastructure, there is no explicit reference to these mechanisms in Priority 5 (which refers to housing supply, choice and affordability in key locations). A commitment to seeking approval for SEPP 70 schemes is strongly desirable by our community, as it is extremely difficult to assess whether local planning controls and initiatives alone will affect private market affordability. The use of SEPP 70 schemes is also crucial to ensuring housing affordability for very low- and low-income households. Hence our support for these specific measures.

5. A commitment within the LSPS to new, affordable residential development that caters to households with specific accessibility and adaptability needs. Though it is recognised in Action 4.2 that public spaces should be inclusive of disabled residents, there is no explicit reference to this in the sections regarding the development of new affordable housing (e.g. Priority 5).

These comments are informed by and reflect the principles for affordable housing in Local Strategic Planning Statements recently published by the state’s peak body for housing policy and advocacy, [Shelter NSW](#).

In the Local Housing Strategy, we support the overall vision for the inclusion of affordable housing and diversity of housing types. Especially the clear policy direction in section 2: *Policy Direction: Ensure that new development provides for not just a diversity of dwelling types, but also a mandatory provision of affordable rental housing.* As well as the inclusion of affordable housing in section 3, as a key criteria, and the inclusion of point 5 in section 7.

We support the actions outlined in section 9 of the Local Housing Strategy but would like to see the minimum raised from 5% to 10-15% and the language strengthened in support of affordable housing.

Yours faithfully

On behalf of the Property Owners Association of NSW

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