



7 January 2016

The President
Planning Institute Australia
PO Box 5427, Kingston ACT 2604
Unit 16 Level 3, Engineering House
11 National Circuit, Barton ACT 2600

Dear President

Re: Planning Institute of Australia Policy Position Housing – Discussion Paper

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of sixteen municipal and city councils. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, the SSROC member councils cover a population of over 1.6 million, or one third of the population of Sydney.

The Planners' Working Group (PWG) is one of the professional working groups of SSROC. The PWG offers a forum and opportunity for strategic, statutory and environmental land use planners and managers from SSROC member councils to network and to share ideas on planning issues and challenges.

Planners from a number of the SSROC member councils contributed to the comments on the PIA discussion paper. As this is early in the year and many council officers are still on leave, it has not been possible for all the planners to review this submission. It should therefore be treated as a draft. I will contact you before the end of January 2016 if there are changes.

The comments of SSROC Planners' Working Group are presented below.

General Comments

The Planning Institute Australia (PIA) intention to contribute and influence housing policy debate in Australia, including housing policy framework is welcome. Although there are other factors, planning has significant implications for housing development, form and strategies. In light of the complexity of the topic, the Discussion Paper provides a welcome introductory overview and discussion of the issues around housing and housing challenges in Australia.

While the PIA Discussion Paper serves good purpose, it could possibly have been more useful if it adopted an approach of canvassing from planners' viewpoint, options and strategies to addressing Australia's housing challenge in the 21st century.

The draft housing policy position paper should add-value to the debate rather than dwell more on restating the problem. A lot is already known about the barriers to housing provision in Australia. An options paper could have better explored the tools and mechanisms available, analyse them and provide more content and opportunities for discussion.

Specific Comments

Approach of the Discussion Paper

The approach is generally descriptive. It is appreciated that the descriptions are helpful for non-planners to better understand concepts and the discussion. It is a considered view that the

paper will be firmer and more focused if it adopts an approach where PIA from a professional viewpoint identifies options and recommends strategies that can make a difference in Australia's housing.

Diversity of housing options

The Discussion Paper provides a nuanced discussion of housing needs, recognizing the different capacities and aspirations of people for housing. It is important to proffer specific options for diversity of housing to meet the needs of different people at different stages of life.

Role of the planning system

The section on the role of planning in delivering housing provides a useful overview of the planning mechanisms and developer incentives available to local government in addressing Australia's housing challenges. This section could be expanded to include more details on the *role of the planning system*. For example, more detailed discussion on how the planning system can be used to secure land for affordable housing development would be helpful.

Affordability - sustainability and design

The PIA paper has understandably, a strong emphasis on affordability. An elaboration of the issues around the sustainability and design of housing could be made to provide further depth to the discussion.

Emphasise experience from housing projects and programs

PIA can meaningfully contribute to the debate by focusing on experience and evidence of what works and what does not work in providing or enabling housing, particular from planning and related perspectives. Emphasis should be on what has to be done to address the issues.

The paper could make a distinct contribution by emphasising what member planners have identified as issues and challenges around housing delivery and what they have done to address these matters. For example, many councils have implemented housing policy or stand-alone projects that contributed to housing and related outcomes. It is important to draw from these experiences as planners are often at the forefront in implementing the strategies and projects.

Distinctive contribution informed by successful models

The position paper will benefit from promoting and encouraging local, national and adaptable international successful models in housing strategy and delivery. PIA needs to build from case studies to form a position on how stakeholders, including local governments, have gone about addressing issues and overcoming impediments to housing delivery and opportunities. PIA needs to ponder on a few questions such as: What innovative strategies or approaches were deployed? What successful models are evolving out there? What lessons have we learnt from planning practice and housing in the last few decades? PIA can draw on these to boost the stance, position and recommendations of the paper. One way that PIA could explore is a survey of members for useful empirical data that could inform PIA's contribution to the housing debate and make their position for informing and robust.

More international proven strategies

The PIA paper provided the international example of the use of inclusionary zoning in the United States. More international examples could be included in the paper to provide opportunities for learning and innovation. For example, the 'self build' cooperative model in Germany, is another example of innovation which could be included in the PIA position paper (see McKenny, July 2015, *Sydney Morning Herald* article available: <http://www.smh.com.au/nsw/addressing-housing-affordability-german-style-20150716-gie68u.html>).

Housing stakeholders

The paper does not identify all key stakeholders in housing delivery. The various stakeholders involved in the provision of housing tend to be motivated by different expected outcomes. The

paper does not identify these stakeholders in the paper or in the implementation mechanisms show in the table in the paper. For example, social housing providers will have different issues and outcomes compared to private housing developers and investors. Mechanisms used by different stakeholders sometimes vary and at times the outcomes that they aim to achieve are at odds.

Ageing in place and housing policy

Federal and State policies also affect housing - such as the Ageing in Place policy, which supports frail older people to remain in their own homes. This has arguably, contributed to the increase in single person households amongst the ageing population and underutilisation of existing housing stock. A suite of policy incentives could be suggested to encourage ageing in place while making it attractive for aged single person households to consider moving to smaller accommodation in the local or neighbouring areas.

Housing needs mismatch

Debate needs to be had on the challenges of meeting the housing needs of low and moderate income households, particularly as they relate to overcrowding and underutilisation. There is the problem of overcrowding in segments of the Australian housing system. The Australian Bureau of Statistics now classifies severe overcrowding as homelessness. On the other hand, housing underutilisation is common not just in the social housing system but also in the private housing sector. This is a complex policy area but a range of incentives or disincentives could influence desirable outcomes.

This is probably more possible in the social housing stream where the disincentive of requiring tenants to pay additional rent for excess bedrooms is arguably having an effect. The NSW Government is implementing this policy in the public housing sector to encourage single or couple only households to opt for dwellings with a smaller number of bedrooms. This then frees multi-room apartments and houses for households that need three or more bedrooms.

Adaptable housing

The paper briefly refers to adaptable housing as a form of sustainable housing design (page 13) but does not go into detailed discussion. The paper could have benefited from contextual details such as the trend whereby Councils are trading off accessible housing for adaptable housing (universal housing design). Adaptable housing is arguably more sustainable than regular housing and cheaper than accessible housing to rent/buy, but the trade-off is that there is no requirement for mobility parking.

Collaboration with Local Government NSW

Local government needs to have a tool kit of customisable solutions to address local issues. PIA should consider working with LG NSW to develop an options paper that is better linked to the local government context and role in housing.

Other

The Discussion Paper will benefit from general editorial review.

The SSROC Planners' Working Group welcomes the development of the draft paper by the PIA, and appreciates the opportunity to make the comments above. If you have any queries please contact me on 8396 3800.

Yours faithfully,



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Southern Sydney Regional Organisation of Councils