



NSW Government
Homes NSW

17 January 2025

Online submission at:
theplan@homes.nsw.gov.au

Re: Consultation on the Draft Discussion Paper to inform the Homes for NSW Plan

Thank you for the opportunity to provide a submission regarding the consultation on the Draft Discussion Paper to inform the Homes for NSW Plan (December 2024).

The Southern Sydney Regional Organisation of Councils Inc (SSROC) is an association of twelve local councils in the area south of Sydney Harbour, covering central, inner west, eastern and southern Sydney. SSROC acknowledges the traditional custodians of the land on which we work and live, the peoples of the Darug, Dharawal and Eora Nations.

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, our member councils cover a population of about 1.8 million, one third of the population of Sydney, including Australia's most densely populated suburbs. SSROC seeks to advocate for the needs of our member councils and bring a regional perspective to the issues raised.

SSROC and its member councils have a strong interest in the supply and ongoing provision of non-market housing in its communities and warmly welcomes the development of the *Homes for NSW Plan* and the opportunity to provide input into the Plan.

1 Understanding

Background

This discussion paper provides an invitation to work with Homes NSW to deliver better outcomes for people seeking housing and homelessness assistance in NSW. Feedback is intended to help Homes NSW produce the Homes for NSW Plan which will be released in early 2025.

In February 2024, the NSW Government created Homes NSW — one entity responsible for social housing, affordable housing, key worker housing and homelessness policy and programs. The Aboriginal Housing Office (AHO) is also part of Homes NSW and retains its statutory independence.

Overview

The *Homes for NSW Plan*, set for release in 2025, will detail Homes NSW's strategies to improve outcomes for people in need of housing and homelessness assistance. The Draft Policy sets a framework to address urgent challenges our cities and urban areas now face, including housing affordability, productivity, social cohesion, disaster resilience and climate action.

The Discussion Paper notes the final plan will focus on the 'nonmarket housing and homelessness system' (the nonmarket system). Products and services in the non-market system require an intervention in the market for people and households on low incomes.

The non-market system includes:

- crisis accommodation (including refuges)
- temporary accommodation (including motels)
- informal housing (such as couch surfing)
- transitional housing
- medium-term housing
- social housing
- affordable housing
- key worker housing
- homelessness services, and
- Aboriginal housing.

The final plan will include:

1. a system-wide vision
2. draft priorities, objectives or indicators to track collective progress towards the vision
3. targets to drive accountability, transparency, and activity across the system
4. the actions Homes NSW will take in the short and medium term.

It is important to note that the *Homes for NSW Plan* will not be a whole of government response. The strategy and policies of other government agencies will form part of the context only.

The discussion paper is quite expansive and seeks feedback on 10 key questions related to the draft vision, priorities and suggested reforms.

This submission will seek to address those issues which are deemed most relevant and pertinent to our local councils in the outlined content and scope of the final plan.

2 General Comments

SSROC welcomes and fully supports the development of a comprehensive and integrated *Homes for NSW Plan*. Importantly the discussion paper helpfully highlights ways of

working with Aboriginal communities and Aboriginal housing and homelessness services to achieve better outcomes.

SSROC considers the discussion paper provides a positive step towards better meeting the needs of households who will access and live in non-market housing.

We believe that for the *Homes for NSW Plan* to be successful, it will need to confront some of the most urgent challenges our cities and urban areas now face, being housing affordability, productivity, social cohesion, disaster resilience and climate action.

Homelessness services are essential and fundamental to homeless people, those at risk of homelessness and our communities. Responses cutting across and engaging all levels of government including local councils and the non-government sector are needed to deliver solutions that work together to make homelessness rare, brief and not repeated.

Social housing delivers affordable homes to those households who need them most and are often at risk of poor outcomes in market housing, often through a combination of very low incomes and their complex support needs.

A focus on affordable housing

However, affordable rental housing and key worker housing warrants some specific attention, as local councils are more directly connected to its supply. Local communities' and businesses' productivity and wellbeing are often detrimentally affected by its absence.

While all forms of non-market housing are very important to local councils and their citizens, affordable rental housing has been given special attention in this submission because it is one of the newest forms of non-market housing, and yet the discussion paper touches on it only briefly.

An increasing lack of access to private housing both home-purchase and market-based rental coupled with the rapid loss of 'naturally occurring' low-cost rental accommodation in the private market is heightening this concern and interest in affordable housing provision.

As a relatively new part of the housing continuum, gaps in the provision of affordable and essential worker housing impact on, and are impacted by, the shortages of social housing, the risk of households becoming homeless and the Government's social license to grow market housing supply.

This submission focuses on affordable and key worker housing in large part because the current state government accountability arrangements are patchy for what is an increasingly important part of housing provision.

This SSROC submission also draws attention to these issues because the discussion paper provides very limited information about the growth of this form of non-market housing, especially in terms of actions and priorities as well as their critical inter-connections with other parts of the housing continuum.

Currently the policy settings for affordable housing delivery, its management and accountability are highly fragmented. A new *Homes for NSW Plan* provides an excellent opportunity to help rectify this, while valuing its flexible contribution to meeting diverse housing needs.

The housing life courses of all households change and evolve, form and re-form. The non-market housing system therefore needs to be flexible, resilient and supportive to enable households to fully participate in their communities at different life stages and opportunities: child rearing; education; employment; retirement; and aged care to name a few.

This submission advocates for new infrastructure and strategies which will help expand affordable housing supply as a valued but flexible response.

Shaping a System-wide Vision

As outlined, the overall draft vision for the non-market system is that:

‘Everyone has access to a decent home and support if they need it’.

The Discussion Paper suggests the *Plan* aims to support this aspirational vision with 3 priority areas for action:

- Customer-driven service
- More and better homes
- A system that works.

Given the distinctive and critical focus on non-market housing in the *Plan* a suggested refinement of the proposed *Homes for NSW Plan’s* vision to be as follows:

‘Everyone has equitable access to a decent home and support if they need it, when the market is not delivering it’.

The qualifying use of *equitable* is also added to promote a shared vision for a fair system. This addition aligns well with the Commonwealth’s vision now articulated in the National Urban Policy – ‘Where everyone has fair access to resources, opportunities and amenities, no matter where they live or their socio-economic status.’¹ The second change seeks to explicitly highlight the imperatives of a non-market context.

Recommendation 1

It is recommended that the vision is amended to:

‘Everyone has equitable access to a decent home and support if they need it, when the market is not delivering it’.

¹ National Urban Policy Discussion Paper

Setting Targets

As noted in the published *Homes for NSW* Discussion Paper webinar, ‘we need accountability, transparency and activity to deliver more homes across the system.’ The paper highlights the interconnections between targets, access and funding. This process should include setting measurable targets for both public, community and Aboriginal housing provider growth in an articulated and diverse multi-provider system. Similarly, there need to be targets for the different types of non-market housing, including affordable housing.

Sydney is being held back by a lack of social and affordable housing. By comparison, the OECD average is 7.1% and in some European countries it is much higher, for example, 14% in France, 24% in Austria, and 34% in the Netherlands².

The chronic and urgent nature of the housing affordability crisis facing NSW and other parts of Australia requires continuous, stable, long-term investment in new social and affordable housing supply and homelessness services.

Recommendation 2

It is recommended that the *Homes for NSW Plan* set aspirational targets to respond to the unmet housing need for each of the different types of non-market housing provision (e.g., social and affordable housing). The plan would also deliver interconnected short and medium term housing targets for the types of housing provider (e.g., public housing, community housing and Aboriginal housing) to promote confidence and plan investment in the capacity of these sector’s delivery systems.

Improved access to Affordable Housing

As a foundational step to underpin the more systematic development affordable housing delivery, it is important to establish (and then maintain) a single public statewide register of affordable housing in the non-market sector as a pre-cursor for target setting for the supply of affordable homes.

This infrastructure would seek to complement the differentiated and equitable access systems that exist for social housing³ and homelessness services.

Currently there is no single source of information for households seeking to access the available affordable rental housing. Similarly, local councils planning for the housing needs of their communities have an opaque picture of the available affordable housing already in their region.

² <https://sydney.org.au/wp-content/uploads/2022/12/Committee-for-Sydney-Bringing-affordable-housing-to-scale-December-2022.pdf>

³ NSW Social housing access system, Housing Pathways provides a single application process, common eligibility criteria, a standard assessment process and a single waiting list known as the NSW Housing Register.

The slides for the Homes for NSW Discussion Paper webinar noted, “We anticipate that thousands of new affordable homes will be delivered in NSW in the near future due to planning reforms and new Commonwealth programs.” (slide 16) underlines this priority.

With the existing value of affordable rental housing being in the billions of dollars, it is remarkable that a statewide register does not yet exist. Addressing this major lapse in public accountability needs to be made a very high priority action for the Plan to capture and ‘protect’ this public resource of affordable housing.

Applicants therefore urgently need a single statewide register of affordable housing properties. It will ensure time limited rentals (e.g., 10 and 15 years) and in perpetuity dwellings are brought together in one place. It would help to ensure that diverse affordable housing programs such as the new Commonwealth Build to Rent program; Landcom housing projects that incorporate affordable housing; and dwellings in schemes and programs like National Rental Affordability Scheme, [Social and Affordable Housing Fund \(SAHF\)](#), affordable housing on State government land are transparently captured and made more accessible to applicants. Under this register the housing providers would be identified and more accountable for their lettings.

This register will also help local councils, their communities and housing developers to have assurance that the affordable contributions made through the planning system are available and being properly used. To facilitate the affordable housing register’s wide use and acceptance, access to this service should be provided at no cost to applicants, councils and developers.

An up-to-date register will help the NSW Auditor General to be able to accurately report to NSW Parliament on the effective use of these originating public resources⁴, specifically those directed to affordable housing from very diverse sources. The NSW Audit Office is currently undertaking an audit to assess whether social housing is effectively and efficiently prioritised to meet the needs of vulnerable households, and whether social housing tenants are effectively supported to establish and sustain their tenancies.⁵ One day, a similar audit of affordable housing is likely to occur.

For simplicity, rigorous accountability and to minimise red tape, the maintenance of the affordable housing register could become the responsibility of the NSW Registrar of Community Housing⁶. NSW Government planning conditions currently require affordable rental housing to be managed by Registered community housing providers. Ideally for simplicity, this affordable housing register should also include all or the majority of key worker housing.

It is extremely difficult for households to find the affordable housing available to rent at any given time in a given sub-region. Establishing an affordable housing register will be an important prerequisite for creating a fair, easy to use common access pathway for people

⁴ The Auditor-General for New South Wales helps the Parliament of New South Wales hold government accountable for its use of public resources. <https://www.audit.nsw.gov.au/who-we-are/about-the-auditor-general>

⁵ <https://www.audit.nsw.gov.au/our-work/reports/social-housing>

⁶ The Registrar of Community Housing registers community housing providers. We also monitor them and take action when needed. We do this through the [National Regulatory System for Community Housing](#)(NRSCH) and the [NSW Local Scheme](#). The Registrar is independent and reports directly to the [Minister for Housing](#). <https://www.nsw.gov.au/departments-and-agencies/registrar-of-community-housing>

applying for affordable housing accommodation, similar to the wait list supporting NSW Housing Pathways for access to social housing.

Recommendation 3

It is recommended that the *Homes for NSW Plan* commit to urgently establishing a single register for all affordable housing dwellings. To be comprehensive and an effective mechanism for enabling access, it is proposed the register include all the affordable housing under the NSW Affordable Housing Ministerial Guidelines⁷.

Such a comprehensive whole of government register would encompass affordable housing regardless of:

- the original funding program and scheme
- the funding body or administering government agency;
- the ownership of the affordable housing dwellings,
- the affordable housing manager, or
- the period of their provision (both in perpetuity and time limited provision).

Recommendation 4

Subject to Recommendation 3 being implemented, it is recommended that the *Homes for NSW Plan* commit to establishing a complementary register for any key worker housing that does not form part of the affordable housing register (due to higher income limits and other criteria etc applying).

The role of affordable housing

The webinar slides for the Homes for NSW Discussion Paper considered some key ideas for future change. They noted that, “We are considering clearly articulating the role of affordable and key worker housing in the system”, and “whether Homes NSW could deliver affordable housing as well as social housing to provide financial sustainability”? (This second issue is addressed later in this submission).

A new report in 2025 has noted that, “Even Australians on median incomes are in housing stress with households on middle incomes spending 33% of their wages on housing.”⁸

Both social and affordable housing are clearly needed in this environment and should play distinct complementary roles in serving people on the housing continuum, now that home-ownership for lower paid workers is increasingly out of reach. It is important to permanently increase affordable housing supply in the widening gap where the housing

⁷ The NSW Affordable Housing Ministerial Guidelines set out the legislative and policy framework for delivering affordable housing that has been developed with financial assistance from the NSW Government or under state planning and is owned or managed by registered community housing providers. With agreement, the register and the guidelines could be potentially extended to include affordable housing produced from finance or funding from the Commonwealth Government where it is not currently captured.

⁸ The Guardian, Cait Kelly, 15 January 2025, *Middle income Australians experiencing rental stress with a third of pay spent on rent*
<https://www.theguardian.com/australia-news/2025/jan/15/australia-rental-crisis-price-increases-corelogic-report>

market is no longer functioning. Both are needed so that no-one and no community is left behind.

The Homes for NSW Plan should describe the important role of affordable rental housing in meeting housing needs of people who are unable to rent affordably in the private market and set out strategies for supplying affordable rental housing at scale to meet this need.

Well designed and carefully targeted affordable rental housing can play a pivotal role in:

- providing secure affordable long-term housing for lower income workers and households who are in ongoing housing stress renting in the private market.
- providing secure housing for essential and key workers, which is critical for many local businesses. These workers are crucial to the productivity of the economy and maintaining our essential services. Economic productivity is improved through providing affordable housing close to key workers' jobs;
- maintaining social cohesion by protecting diverse communities of low-income renters living in older housing who would otherwise be displaced by population growth and rapid redevelopment of their lower-cost housing;
- lessening demand on the social housing and homelessness services safety nets by keeping people in employment through the provision of stable housing and connected to their local community; and,
- contributing to the achievement of net zero goals through building and construction standards applied to new affordable housing that delivers more sustainable and low carbon residential building solutions.

While having a financially sustainable operating model for affordable housing is vitally important, it is not the primary reason or driver for affordable housing provision.

Affordable housing is distinct from social housing in a number of respects

Social and affordable housing often play different roles in the housing system, despite some overlaps in customer income groups, each with special responsibilities for housing different income segments of the community. In response to these differences, they have different subsidy levels and accountabilities. For example, social housing has uniform statewide income eligibility criteria that apply across the state reflecting in part the uniform social security payments most tenants receive. Affordable housing has two sets of income-linked criteria for high and lower cost housing markets (Sydney and the rest of NSW). Accordingly, different income eligibility criteria apply under the Ministerial Affordable Housing Guidelines for Sydney and the rest of NSW.

Social housing strives to provide fair access to those households most in need, using a uniform statewide approach. It has its own legislative framework, funding and program arrangements and tenant appeals processes related to its own internal operating rules. Social housing is provided within a human rights framework and access is very carefully rationed, with at-risk households with complex needs prioritised. Affordable housing has broader, simpler, eligibility criteria with targeting based on income to lower income households in housing stress in the private market.

Due to affordable housing sector's size and its broader income eligibility groups, the affordable housing sector clearly lacks the capacity to respond to the scale of the housing need from households who are eligible to receive it.

Both social housing and affordable housing require a subsidy to operate. Social housing's subsidy requirements are larger and deeper while affordable housing's subsidy requirements are smaller and shallower to deliver affordability outcomes. As noted, social housing provides a deep financial subsidy to very low-income households and aims to help vulnerable tenants sustain their tenancy and avoid future homelessness. Because of the high ongoing cost of the subsidy, it has a set of strict eligibility requirements that are routinely reviewed and adjusted.

Affordable housing is structured and designed to respond to local market and conditions and opportunities and largely assumes any tenants support requirements will be found by the tenant in their communities.

Community housing providers are well placed to adapt and respond to these varied needs and manage these drivers and typically manage both social and affordable housing in different service streams.

Recommendation 5

It is recommended that the *Homes for NSW Plan* articulate that the role of non-market affordable rental housing is to primarily meet the unmet housing needs of a segment of very low-, low- and moderate-income renters unable to rent affordably in their local housing markets.

Strategies to grow affordable housing at scale

Once the role of affordable housing has been determined, the need for affordable rental housing and the scale of the supply response has to be addressed with short, medium, and long-term strategies.

The Committee for Sydney in its report, *Bringing affordable housing to scale (2022)*⁹ plots a path and provides a set of strategies to deliver on this objective of large-scale provision of affordable and social housing. It recommends a set of strategies for expanding larger, growth-oriented registered community housing providers.

This issue of the size of the response is important to local councils because a larger scale response is now urgently needed in our communities as the housing market remains seriously unaffordable for very low-, low-, and moderate-income renting households. Many councils have set ambitious targets for affordable housing provision in their Local Housing Strategies. An affordable housing supply response at scale will help to ensure that essential workers can live close to their jobs; enable local businesses to attract the stable workforce they need; for renting families to be able put down roots into their communities;

⁹ <https://sydney.org.au/wp-content/uploads/2022/12/Committee-for-Sydney-Bringing-affordable-housing-to-scale-December-2022.pdf>

for children's schooling not to be disrupted; and locational displacement of older and disabled vulnerable members to be minimised.

Articulating the connections between the *Homes for NSW Plan* for affordable rental housing and funding programs and the Housing Australia Future Fund (HAFF) loan facility will be critical to successful implementation of an effective scaled-up growth strategy.

Clarity around this strategy will strengthen the rationale for local councils to choose to vest affordable housing contributions and affordable housing dwellings with selected Registered CHPs as an effective way of optimising local affordable housing supply.

The Plan should set the policy context and strategies for linking national housing policy settings, state government commitments to affordable housing (e.g., on surplus government land) and the NSW planning system recent moves to adopt mandatory inclusionary zoning in growth precincts.

Recommendation 6

It is recommended that the *Homes for NSW Plan* articulate a set of strategies to grow affordable housing at scale to support the role of non-market affordable housing as a means of meeting the housing needs of an unmet segment of very low-, low- and moderate-income renters in diverse local housing markets.

The case for and against Homes NSW delivering affordable housing to improve Homes NSW financial sustainability

The webinar slides for the Homes for NSW Discussion Paper highlighted some key ideas for change. They noted that, "We are considering whether Homes NSW could deliver affordable housing as well as social housing to provide financial sustainability".

Arguably serving the needs of social housing tenants has been established as Homes NSW priority task from the NSW Government, along with homelessness assistance and accommodation. This priority is reflected and entrenched in Land and Housing Corporation's legislation, Commonwealth housing funding agreements as well as specific tenancy laws established by the State Government.

In this context there are a number of considerations for and against Homes NSW delivering affordable housing to improve sustainability.

Local councils have a direct interest in this question with an over-riding concern that the available affordable rental housing grows and meets local housing needs. This includes the needs of local businesses for key workers, minimizing disruptions to cohesive communities and serving local housing priorities. The local community should have coherent access to the available affordable housing. Councils need to account for the effective use of affordable housing contributions made through the planning system.

Currently community housing providers manage this tension by having both social and affordable housing tenants side by side, in different programs and different asset portfolios. While tenants have many of the same rights and obligations, there are some

significant differences. Increasing both social housing and affordable housing can be seen as competing for the same scarce resources. This tension is managed by the Community housing providers and government agencies by different programs for social and affordable housing and respective funding agreements that keep the finances and operating contexts largely separate.

For

- Public housing and Homes NSW running and administering affordable rental housing will require lower subsidies than public housing due to the average affordable housing tenant's higher rental stream. Where upfront subsidies are provided as land at no cost by Homes NSW, the affordable housing could potentially return an operating surplus to Homes NSW and improve its financial sustainability¹⁰.
- In certain instances, existing tenants of public housing due to employment and higher income could transfer to affordable rental housing run and administered by Homes NSW, freeing up a public housing dwelling for those in greater need on the social housing waiting list. (Some community housing providers already have this practice of social to affordable housing transfers.)
- For existing public housing estates undergoing major renewal, redevelopment and densification that result in a new mix of social, affordable and market housing, there is a case for the social and affordable housing to be managed by one housing provider to achieve better coordination and streamline decision-making. This could be Homes NSW. [However, this could also be a disadvantage. See reasons noted in the following arguments against].

Against

- Unlike public housing and Homes NSW, registered community housing providers can access long-term, secure low-cost finance from the Commonwealth's Housing Australia Future Fund facility. This source is important if ambitious housing targets are going to be set for growing affordable housing provision.
- Over time there is a likelihood that there will come strong pressures on Homes NSW to prioritise social housing over affordable housing provision to meet budget and service demands arising from a financially strapped public housing system. Communities and their local councils (and their community housing partners) have different and less conflicted long-term objectives and plans for delivering local affordable housing provided in perpetuity.
- Unlike public tenants on the same income, eligible tenants of community housing providers can access Commonwealth Rent Assistance providing an assured income stream and improving financial sustainability to the business of community housing providers. This mainly affects affordable housing tenants on low and very low incomes. Community housing providers already successfully provide distinct complementary programs serving social and affordable housing households. If one

¹⁰ This proposition would need to be tested by financial modelling.

of the objectives of Homes NSW managing affordable housing is to improve organisational viability this would be seriously weakened by the inability to collect Commonwealth Rent Assistance from its tenants.

Under Homes NSW tenancy and property management, without further strong legislative protections, risks of strong competing business interests affecting affordable housing management by Homes NSW will persist.

This risks Homes NSW:

- De-prioritising affordable housing relative to social housing provision, at some point in the future;
- Experiencing short- and long-term budgetary pressures to convert the affordable housing into social housing; and/or
- Choosing to realise these affordable housing assets to help underwrite a chronically underfunded social housing system.

Recommendation 7

On balance, it is recommended that Homes NSW not move into a new role of providing affordable rental housing and that this generally remain as the domain of the not-for-profit and non-government sectors as part of its explicit growth strategy.

Recommendation 8

It is recommended that Homes NSW continue manage the Building Homes Program for key workers and look for opportunities for community housing management of these properties.

Partnering with Local Government

Through collaboration with Homes NSW and other agencies, our councils aim to support those experiencing homelessness, residents in social and affordable housing and our social housing communities. All of the key national challenges – including housing affordability, productivity, circular economy, social cohesion, disaster resilience and climate action – require coordination between local, regional and statewide responses.

A shared policy commitment to enhancing transformative capabilities of all levels of government is also essential to moving from business as usual in the current housing crisis. Furthermore, using regional bodies representing the collective interests of local councils, like SSROC, should also be part of this mix.

Partnerships need to be expanded to include and engage regional organisations of councils, such as SSROC, as collective expressions of local governments' interests. Uniquely they have a focus on, and long-term commitment to, tackling shared regional challenges. As partners they, and their council members, have a deep understanding of regional economic, social and environmental needs and a joined-up picture of councils' and the State's existing and proposed investment strategies that have been designed to enhance community well-being and place outcomes.

In particular, the Homes for NSW Plan should highlight the important role of local government in placemaking, formulating local housing strategies and service delivery responses and collaborations with non-market housing provision.

SSROC is committed to working in partnership with the NSW Government to foster resilient, inclusive and connected communities for our councils.

A range of measures are suggested as ways of developing a practical partnering approach with Homes NSW:

- Co-ordinating with local governments to identify opportunities for the provision of non-market housing.
- Collaborating with local governments early in the process to maximise the social benefits and public support for the provision of non-market housing on government owned land.
- Developing a statewide policy requiring affordable housing targets on government owned land.
- Working with local governments early in planned estate renewals to ensure community needs, connection and aspiration are embedded in the planning of housing and of community infrastructure provision.

Many community housing providers are partnering with local councils across the state around affordable housing provision. These partnerships have shown that local councils and local community housing providers can formally agree to work together to successfully and sustainably address a local community's housing needs.

Recommendation 9

It is recommended that the *Homes for NSW Plan* give recognition through explicit strategies to work with local councils as partners of Homes NSW and of registered community housing providers to plan and deliver non-market housing and to jointly support local placemaking initiatives.

Affordable housing assisting with delivering the missing middle

The Tier 1 and 2 community housing providers could play a much larger and more significant role in delivering the missing middle, mid-rise, medium density housing for our urban areas. This could potentially form part of, or be linked to, the NSW Building Homes for NSW program¹¹.

¹¹ Part of the building Homes for NSW program includes delivering more than 21,000 affordable and market homes. This program will help deliver 21,000 affordable and market homes across our state using well located land that is sitting empty and unused. The Building Homes Program will also deliver affordable rental homes for key workers so they can live where they work and be a part of the communities that rely on them. <https://www.nsw.gov.au/departments-and-agencies/homes-nsw/building-homes-for-nsw#toc-about-building-homes-for-nsw>

Medium density affordable rental housing at scale is required to achieve inclusive renewal in many of our urban precincts. Councils are often supportive of this housing form as it can provide an important and welcome spatial transition from high rise to low rise housing. It will be critical to making the densification of our cities more livable, fair and vibrant and so help slow down the sprawling growth of the urban periphery, on the fringe of our cities and urban centres.

Community housing providers have shown themselves to be adept mid-rise developers and construction project managers that have made these types of housing projects viable due to their not-for-profit status and lower cost structuring, where the average private developer has struggled.

Recommendation 10

Housing NSW and the Department of Planning Housing and Infrastructure develop a clear, streamlined policy and funding that promotes medium density infill by community housing developers and providers on government land, where affordable rental housing at scale together with market housing, can become a transformative component for these mid-rise urban strategies of local councils.

3 Conclusion

Thank you for the opportunity to provide a submission regarding the Discussion Paper to inform the *Homes for NSW Plan*. SSROC warmly welcomes the intention to develop a comprehensive and coherent plan that incorporates all forms of non-market housing and accordingly has made a number of recommendations for consideration as part of the *Plan*'s development. Ways of supporting the growth of affordable rental housing in response to local housing needs is a particular focus of these recommendations.

SSROC understands many of the challenges and opportunities of the non-market housing sector, particularly within the context of an increasingly dense, urban environment. We look forward to the production of a transformative *Homes for NSW Plan* which responds dynamically to the size of the housing crisis, our key urban challenges and climate risks. A truly transformative plan will need to be well connected to council Local Housing Strategies to ensure spatial alignments occur that effectively support and sustain local governments as important place makers and community builders and service providers.

SSROC member councils cover a large part of Greater Sydney and have a direct interest in supporting and advocating for integrated policy to support housing growth. Our councils pride themselves on providing orderly, well considered place-based planning for their communities.

In particular, this submission advocates for a *Homes for NSW Plan* that supports council led master planning of places and growth precincts to achieve the National and NSW Government goal of well-located market and non-market housing that accompanies population growth.

In order to make this submission within the prescribed timeframe, it has not been possible for it to be reviewed by councils or to be endorsed by a formal meeting of SSROC



Delegates. I will contact you further if any issues arise as it is reviewed. If you have any queries, please do not hesitate to contact me or Mark Nutting, SSROC Strategic Planning Manager on 8396 3800, or ssroc@ssroc.nsw.gov.au.

Yours faithfully

A handwritten signature in black ink that reads "H Sloan".

Helen Sloan
Chief Executive Officer
Southern Sydney Regional Organisation of Councils