

**LGNSW Submission to
NSW Government *Housing Strategy for NSW*
*Discussion Paper***

July 2020

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1.0 Opening

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in the State.

LGNSW welcomes the opportunity to make a submission to the Department of Planning, Industry and Environment (DPIE) on its Housing Strategy for NSW Discussion Paper.

This submission has been reviewed and approved by the LGNSW Board.

The submission is informed by LGNSW's Policy Platform, Annual Conference Resolutions and our engagement with members on specific planning and housing issues.

The need for more affordable housing has been an urgent priority for some time. As Australia enters its first recession in 29 years following years of drought, the impact of the catastrophic bushfires over 2019/20 and now the effects of the COVID-19 pandemic, the obligation for action to address housing need is even more critical. Despite the temporary measures by the NSW Government to prevent a surge of evictions and a 'mortgage pause' from lenders to assist those struggling with loans, rental and housing debts continue to accrue.

At the same time governments at all levels are developing strategies to help the economy recover from the impact of COVID-19. Planning changes and reforms such as the Planning System Acceleration Program have been developed as part of the NSW Government's response. LGNSW has cautioned that these must not come at the expense of proper assessment or by overriding local planning controls. The public health requirements to stay at home have highlighted the importance of neighbourhood amenity and access to local services and open space.

Developing a Housing Strategy for NSW provides an important opportunity to commit to a partnership approach to develop swift and effective responses to housing need for all in NSW and across the housing continuum.

2.0 Local government and housing

Local councils as the level of government closest to the community, play an important role in engaging with and planning for the needs of their communities. This includes planning to ensure there is an appropriate supply and mix of housing to meet the community's diverse and changing needs.

Councils have primary responsibility for developing strategic plans for their areas through their recently completed Local Strategic Planning Statements (LSPS), Local Environmental Plans and other policies. They determine the amount, form and location of housing to be provided and influence opportunities for economic development. These roles, combined with the services and infrastructure they provide, influence the affordability, sustainability and liveability of neighbourhoods.¹

Whilst local government operates in a broader institutional framework with their role in housing focussed on planning and housing policies and targets established by the state government, some councils choose to extend their involvement in housing beyond these requirements to respond to growing unmet housing need and homelessness amidst continued shortfalls in Commonwealth and State funding for housing assistance.

Innovative responses from councils include using excess council land or buildings for housing, collaborating with local community service and housing providers and hosting local housing forums. Some councils have also developed homelessness strategies which include prevention, crisis support and other services and assisting with pathways out of homelessness. The City of Sydney, which established the first council-run Homelessness Unit in Australia, currently invests over \$2 million each year to reduce homelessness and its impacts in Sydney. This includes \$3.5 million over three years to fund specialist homelessness services in the inner city.²

Council responses to housing and homelessness across the state are diverse, as they are shaped by the impact of national and state government actions and requirements at a local level and the nature of housing challenges in the locality. They are also affected by the financially constrained environment that councils operate in and the many other priorities they seek to respond to.

Importantly there are some significant differences between metropolitan and non-metropolitan regions with respect to housing³. Whereas high rates of population growth and unaffordable housing are often the pressing issue in the major cities, elsewhere local governments take action to encourage population growth and the viability of their local economic and housing markets. These large-scale differences in housing challenges are significant and mean that local governments need to deploy highly differentiated approaches to ensure the sustainability of their housing markets. These differences also mean that blanket one-size-fits-all policy responses from state and federal governments are not appropriate and more tailored and flexible solutions are needed.

¹ Department of Communities and Justice, *NSW Local Government Housing Kit*

² City of Sydney *Housing for All, City of Sydney Local Housing Strategy*

³ ARC Linkage Project, *Local Government and Housing in the 21st Century: A Report on the Local Government and Housing Linkage Project national survey: Sydney Metropolitan results*. 2018

The Policy Platform for LGNSW⁴, which reflects the collective positions of local government informed by the Local Government NSW Annual Conference, highlights a number of actions on housing which point to common concerns and the diversity of issues across councils. They call for action on the shortage of social and affordable housing and increasing rates of homelessness, and improvements in the planning system to support housing growth and diversity that maintain the unique characteristics of our suburbs, cities and regions that we all value. Resolutions from the 2018 and 2019 Conferences that relate to the NSW Housing Strategy are set out in Appendix 2.

3.0 Partnership and collaboration

LGNSW commends the NSW Government for committing to the development of a 20-year end-to-end housing strategy that covers the whole of NSW. Secure housing underpins positive life outcomes for individuals and families and communities.

All levels of government, industry and communities can benefit from a strategy that establishes a comprehensive set of actions for addressing housing needs. LGNSW welcomes the recognition in the Discussion Paper of the critical role that local government plays in delivering the housing communities need.

The development of a Housing Strategy is an important opportunity to develop new ways to collaborate to deliver better housing outcomes for all. LGNSW would welcome further dialogue about how this can be achieved.

This approach is in line with the Intergovernmental Agreement between LGNSW and the NSW Government which recognises that implementation of state and local government policy agendas relies on an effective and strong partnership between these spheres of government.

The recently developed National Population and Planning Framework provides for collaboration across government. It recognises that Commonwealth, State and Territory and local governments share responsibility for many government policies that help shape population change and while some policies are the exclusive responsibility of one level of government, most policies have the potential to impact other levels of government.

It seeks to enhance the ability of jurisdictions to manage their circumstances through the following elements:

Element 1: Establishing a common understanding of population and population change

Element 2: Ensuring greater collaboration across jurisdictions

Element 3: Increasing transparency

Element 4: Facilitating shared action.

⁴ https://lgnsw.org.au/Public/Policy/Policy-Platform/Public/Policy/Policy_Platform.aspx?hkey=4cd76f65-089a-401d-906d-63431b9f6661

Recommendation 1

That the NSW Housing Strategy establishes a strong governance framework that supports a genuine partnership with local government and effective collaboration to develop and implement the Action Plan for the strategy.

4.0 Response to key themes

Theme 1: Housing supply in the right location at the right time

Local planning and housing supply

The *Environmental Planning and Assessment Act 1979* cements the strategic planning role for local councils through the preparation of Local Strategic Planning Statements (LSPS) and Local Environmental Plans (LEPs). Together they support implementation of district and regional plans and priorities at the local level.

The NSW Government has established housing supply targets through Regional and District Plans for all areas in NSW with local councils responsible for delivering on these targets through their LSPSs and LEPs. Various State Environmental Planning Policies (SEPPs), State Significant Developments and developer-led planning proposals also impact on the way housing is delivered.

Councils also prepare Community Strategic Plans describing the community's vision and aspirations for a period of 10 or more years, in accordance with the *Local Government Act 1993*. Many of these identify housing issues and needs and how the services that councils and others provide can best respond to them.

Planning for housing is complex and requires balancing competing priorities. Local councils have worked closely with their communities to develop LSPS's to determine how district and regional housing targets will be implemented in their area. This is also being informed by Local Housing Strategies developed in accordance with state government requirements. Challenges to accommodating housing growth vary across councils. Balancing the need for more housing with the imperative of preserving land for economic (industrial, commercial and agricultural) uses and environmental constraints (such as buffers around environmentally sensitive habitats, intensive agriculture and land subject to climatic risks) are some of the challenges. The plans that councils develop are an important resource for all involved in responding to housing needs. They provide insights into issues, challenges and opportunities unique to each area and should play a central role in the NSW Housing Strategy.

Councils are often unfairly criticised for "holding up" development. However, councils also experience delays from state agency approval processes for planning proposals. The planning process has been established to enable complex issues to be considered when making planning decisions. There are always opportunities to improve the planning system but if not well conceived, will often have unintended impacts. Local government input at early stages helps avoid these outcomes.

The timeframe for review and the criteria to be used for endorsement of local housing strategies is unclear. LGNSW understands that some councils have been waiting for more than six months for a response to their strategies.

The NSW Housing Strategy should provide clarity on the roles and responsibilities of all players to support efficient and effective planning for housing.

Recommendation 2

That the NSW Housing Strategy: recognises the primary responsibility of local government in planning for housing at the local level, ensures that planning system reforms and changes are co-designed with councils and provides a clear framework for endorsement of Local Housing Strategies.

Housing supply targets

Housing supply and the timing of development are also affected by factors such as housing market cycles, tax and other policy settings, development industry investment decisions and consumer preferences. The recent slowdown in immigration and increasing unemployment as a result of COVID-19 is likely to have significant impacts on housing demand and housing markets.

The NSW Housing Strategy should provide a framework for monitoring and review of housing supply targets, including concurrence with local government areas to set housing targets. In undertaking local housing strategies, councils have identified issues, for example clarity on whether targets include non-private housing such as social housing and whether the distribution of district targets across LGAs is optimal. LGNSW also understands that despite the significant increase in supply over the past few years (particularly in the metropolitan area) it has not delivered the diversity and affordability needed.

LGNSW would welcome a comprehensive and transparent system of monitoring and evaluation of housing targets that is co-designed with councils and that does not create onerous reporting requirements. This should allow for local government concurrence in setting and ongoing refinement of housing supply targets and identifying any planning system changes that may be required.

Recommendation 3

That the NSW Housing Strategy establishes a clear framework for review of housing supply targets which includes concurrence with local government areas in setting these targets.

The importance of infrastructure

Housing goes hand-in-hand with infrastructure and services which are vital to create healthy and liveable communities. This includes public transport, health and education facilities, local roads, pedestrian and cycle networks, local water, sewerage and stormwater facilities, parks, recreation, cultural and community services facilities and a high-quality public domain. Contemporary community expectations are that these essential services and facilities will be available when residents move into an area.

“An effective infrastructure contributions system is important to delivering vital public infrastructure, unlocking new housing supply, supporting commercial development and boosting investment in New South Wales”.⁵

Councils have significant responsibilities for infrastructure provision with very constrained resources. Communities are unable to thrive and liveability is diminished when housing supply is not matched with timely provision of infrastructure and services.

LGNSW welcomes the holistic review of infrastructure funding in NSW currently being undertaken by the NSW Productivity Commissioner. A framework that ensures equitable and efficient funding of local infrastructure is fundamental to achieving the housing and liveability outcomes we seek.

It is also important that housing contributes to place-making and that the safety and quality of the built-form meets community expectations. As the City of Sydney notes, *When urban renewal is poorly conceived and implemented it erodes community trust in the planning system and jeopardises the strategic objectives of the District Plan and Sustainable Sydney 2030*.⁶

Recommendation 4

The NSW Housing Strategy include as additional outcomes: housing growth that is supported by equitable and efficient funding of infrastructure and that contributes to place-making and the safety and quality of the built-form.

Increasing the supply of social and affordable housing

While district and regional plans have established targets for housing supply in general and these have been translated to targets for each local government area, increasing supply alone will not address the acknowledged housing affordability problem.

“Affordability and supply are not the same thing. In big, mature metropolitan areas...affordability has to be produced through active housing market policy. That means directly targeting affordability and access for every group and every mix of housing.” *Michael Storper London School of Economics*⁷

The discussion paper acknowledges that supply of social and affordable housing has not kept up with demand. The current shortfall in NSW has been estimated at over 200,000 dwellings, 136,100 in Greater Sydney and 80,400 in the rest of NSW⁸. LGNSW recognises the urgent need for more social and affordable housing in all regions of NSW to provide security and a social safety net for those who otherwise may be at risk of homelessness owing to long waitlists for public housing. The economic impacts of drought, bushfire and COVID-19 are adding to the numbers in need of affordable or social housing, exacerbating the pre-existing shortfall.

A commitment to clearly stated minimum targets for affordable housing is vital if we are to begin to address this shortfall. LGNSW supports the Greater Sydney Commission’s (GSC’s) affordable

⁵ NSW Productivity Commission *Review of Infrastructure Contributions in New South Wales Issues Paper* July 2020

⁶ City of Sydney *Housing for All, City of Sydney Local Housing Strategy*

⁷ City of Sydney *Housing for All, City of Sydney Local Housing Strategy*

⁸ City Futures Research Centre, *Estimating need and costs of social and affordable housing delivery* March 2019

housing target of 5 to 10% of all new floorspace in land release and urban renewal areas⁹. On government owned land, LGNSW recommends an affordable housing target of 25% of development.¹⁰

While the proportion of people living in social housing in NSW is around 4.1% this varies across the state depending on the amount of social housing in each local government area, with some falling short of the average and others above. Further, the distribution of social housing within local government areas is not well integrated. It is often concentrated in particular suburbs, creating pockets of social disadvantage. Both the shortfall and suburban concentrations result in an inequitable financial burden on councils as they create increased demand for local infrastructure and services.

While councils can and do make a contribution to the supply of affordable housing (within State Government policy settings) social housing is primarily the responsibility of State and Commonwealth governments. The NSW Housing Strategy should introduce minimum targets to provide more social and affordable housing for households at the lower end of the housing need continuum across NSW. A commitment by the NSW Government to fund more social housing would stimulate the NSW economy and deliver enormous social and economic dividends.

Recommendation 5

The NSW Housing Strategy introduce minimum targets of 5-10% social and affordable housing across NSW and 25% for government-owned land, and commit to providing the requisite responsibility/resources within State Government and relevant agencies (e.g. DPIE, GSC, Infrastructure NSW, DCJ) to delivering policies and plans to meet these housing needs.

Short-term Rental Accommodation

The emergence of online booking platforms and the development of the sharing economy has seen a significant expansion of short-term rental accommodation in NSW. This has varying impacts across the state. In some areas the use of residential dwellings for short-term rental accommodation provides important economic benefits, while in other locations there are concerns that this is reducing the amount of stock available for long-term housing and has impacts on affordability.

The amount of housing that is diverted to use solely for the purpose of short-term rental accommodation clearly has implications for housing demand and supply. The NSW Government has been developing an integrated framework for short-term rental accommodation. LGNSW has consistently argued for an approach that provides flexibility for councils to determine the locations and the duration for use of properties for short-term rental accommodation so they can better manage local impacts.

LGNSW calls on the NSW Government to finalise the framework for the regulation of short-term rental accommodation, to give clarity and certainty to councils and the short-term

⁹ <https://www.greater.sydney/metropolis-of-three-cities/liveability/housing-city/housing-more-diverse-and-affordable>

¹⁰ https://www.lgnsw.org.au/Public/Policy/Policy-Platform/Public/Policy/Policy_Platform.aspx?hkey=4cd76f65-089a-401d-906d-63431b9f6661 (p 13)

accommodation industry. The impacts of this on housing supply and housing markets, including its effect on achievement of housing targets, should be addressed in the Housing Strategy.

Recommendation 6

The NSW Government finalise a regulatory framework for short-term rental accommodation that provides flexibility for councils to manage the impacts at a local level so that they can balance important affordability and housing supply and amenity impacts with economic benefits.

Theme 2: Diverse housing for diverse needs

Diverse housing forms

Councils recognise and support the need for a wider range of housing at varying price points to respond to diversity of demand across all cities and regions.

A primary mechanism for facilitating housing diversity and affordability in NSW has been the development of State Environmental Planning Policies (SEPPs). Many have been in place for some time. SEPPs have been introduced intermittently over decades in response to particular planning issues, and in many cases with no intrinsic review or monitoring mechanism to measure effectiveness and impact. In councils' experience these policies often work at cross purposes, do not always deliver the outcomes they have sought to achieve and can lead to poor planning outcomes.

For example, councils have been raising concerns about the impact of State Environmental Planning Policy (Affordable Rental Housing) 2009 (ARHSEPP) for some years. Despite some amendments to the policy and selected 'good' examples, councils advise that standard development provisions for boarding houses lead to developments that are out of scale with the locality and that the cumulative impact of boarding houses is placing pressure on local infrastructure. Further, as the accommodation and rents are not regulated boarding houses are not delivering housing that is affordable.

Work commissioned by Southern Sydney Region of Councils (SSROC) noted that since being introduced there has been little analysis to understand if the policy has achieved its aim and that it needs to be assessed in the local context rather than across a broad region or state¹¹. The study found that of over 9,000 boarding house rooms approved since the SEPP began, more than two-thirds were in the City of Sydney, half of these were targeted to student accommodation and were only marginally cheaper than one-bedroom units. Over half the 8,000 secondary dwellings approved across the SSROC region were in Canterbury-Bankstown and rents for these dwellings were marginally higher than comparable dwellings in each area.

State Environmental Planning Policy – Housing for Seniors and People with a Disability has led to oversupply in some areas but not delivered in others. In the Hills, Hornsby and Northern Beaches local government areas, large seniors housing development in non-urban areas has placed pressure on local infrastructure and is not consistent with local planning for these locations.

¹¹ City Futures Research Centre *State Environmental Planning Policy (Affordable Rental Housing) 2009 and affordable housing in Central and Southern Sydney*, June 2018

These issues highlight the need for greater consideration and monitoring of the impacts and effectiveness of SEPPs in the local context and resourcing councils to develop locally appropriate responses to housing diversity, affordability and supply objectives.

Recommendation 7

That the NSW Housing Strategy undertake a comprehensive review of housing-related SEPPs and make it standard practice to include review mechanisms in all SEPPs to measure their effectiveness and impact.

Diverse housing needs

Councils are committed to working with the NSW and federal governments to ensure that the most vulnerable members of the community have access to safe, secure, affordable and suitable housing and welcome the NSW Government's focus on this matter. Local government plays an important role in creating an environment which is inclusive of all people, through its planning role and engagement in many community activities and services.

The Housing Strategy should include a clear outline of the rights, roles and responsibilities of key government and non-government organisations in addressing housing security. For example, greater clarity on roles could be provided to police, councils, homelessness providers, health providers (especially hospitals), child protection services, as well as members of the public.

Recommendation 8

The Housing Strategy should include a clear outline of the rights, roles and responsibilities of key government and non-government stakeholders in addressing housing security.

Aboriginal people

LGNSW welcomes the Discussion Paper's emphasis on ensuring the Housing Strategy addresses the housing needs of Aboriginal people, noting that inadequacy of housing is a key social determinant of the life expectancy and health gap between Aboriginal and non-Aboriginal Australians and a key mechanism for continued intergenerational disadvantage. One of LGNSW Fundamental Principles is recognition of the unique place of Aboriginal people in NSW and the right of Aboriginal people to be involved in all decisions affecting Aboriginal communities.

Councils back calls for greater State Government investment in initiatives such as detox and residential rehabilitation and treatment programs, with the lack of such facilities leading to Aboriginal over-representation in the criminal justice system. These services need to be allocated greater funding in the next State budget, based on recommendations of the January 2020 report of the Special Commission of Inquiry into the drug 'Ice'¹², which support increased investment in drug detoxification and rehabilitation services in regional NSW.

¹² <https://www.dpc.nsw.gov.au/publications/special-commissions-of-inquiry/the-special-commission-of-inquiry-into-the-drug-ice/>

Councils are seeking more guidance for how to respond to people who are homeless from minority groups. The involvement of Aboriginal workers and organisations, including Local Aboriginal Land Councils, in the provision of homelessness services is strongly supported.

Recommendation 9

LGNSW calls on the Housing Strategy to emphasise the NSW Government working with Aboriginal communities, organisations and local government to set clear targets to reduce housing disadvantage impacting Aboriginal people in NSW.

Ageing and disability

The Discussion Paper notes that the proportion of older people in the NSW population is increasing and that people with disability can experience higher levels of disadvantage in housing.

While it is welcome that the Discussion Paper highlights the need for suitable housing for seniors and people with disability, this need is highlighted as a separate category of housing, which does not align with an overall universal design approach to planning and strategy development. While the Discussion Paper is intended to lead to a Housing Strategy for NSW, it is important that the final strategy makes reference not only to local and state government, but also to the role of federal government and national standards and guidelines, including those of the Australian Building Codes Board (ABCB) where appropriate.

While the home is acknowledged as a critical component of societal wellbeing, Australia still does not have a mandated minimum standard of universal design for dwellings – aiming for housing that is designed to be usable by all people to the greatest extent possible without adaptation or modified design.

In 2014, councils resolved at the LGNSW Annual Conference to call on:

- *the Australian Government to direct the Australian Building Codes Board to make urgent changes to the Building Code of Australia to incorporate universal design principles into the design requirements of private residential dwellings.*
- *the NSW Government to replace all references to Adaptable Housing Standards AS4299 with the Liveable Housing Australia (LHA) Guidelines ‘Gold Standard’.*
- *the Australian Government to develop mandatory targets for new dwellings to meet the LHA Gold Standard by 2020.*

While these measures have not yet been achieved, LGNSW has reiterated these positions in its advocacy, including as part of the ABCB’s consultation addressing a proposal to include minimum accessibility standards for housing in the National Construction Code.¹³ LGNSW is pleased to see options for Gold Standard specifications included within ABCB’s Consultation Regulation Impact Statement that is currently open for consultation.

¹³ LGNSW submission to the Australian Building Codes Board on Accessible Housing Options Paper, December 2018, available at: https://www.lgnsw.org.au/files/imce-uploads/581/Submission_to_the_Australian_Building_Codes_Board_Final.pdf

In line with aspects identified in the ABCB Accessible Housing Options Paper, LGNSW supports the following principles and measures for accessible housing and would welcome the NSW Housing Strategy explicitly addressing and supporting these in its final iteration:

Recommendation 10

The Housing Strategy should incorporate:

1. a regulatory approach to make new housing accessible to everyone,
2. an agreed definition of accessibility to be developed and legislated which incorporates consideration of universal design principles, and
3. mandating minimum accessibility standards to be at the Liveable Housing Australia (LHA) Design Guidelines Gold Level (Option 3) or an equivalent standard at this level or higher.

Recommendation 11

LGNSW would also welcome the Housing Strategy linking and aligning with the new NSW Ageing Strategy and the National Disability Strategy, both of which are currently under review.

Homelessness and rough sleepers

While the NSW Government is ultimately responsible for housing and homelessness (working closely with the community sector), councils invariably manage a large degree of rough sleeping due to their responsibility for maintaining public space and linking vulnerable people to outreach and support services. In addition, councils work closely with a range of housing and homelessness services, domestic violence agencies, police and specialist homelessness service providers that operate in their respective areas.

Multiple LGNSW Annual Conference resolutions in recent years have called for action to address housing and homelessness crises in NSW. Several of these resolutions specifically seek action from the NSW Government on housing and homelessness issues affecting regional and rural NSW, in acknowledgment that this is not an issue for metropolitan areas alone.

While increased supply of public, social and affordable housing explored elsewhere in this submission will reduce the incidence of homelessness, there are other specific actions that could also contribute to this effort. Further detailed information on how the State Government could assist councils to address homelessness is available in LGNSW's February 2020 Submission to the Inquiry into the Protocol for Homeless People in Public Places.¹⁴

Rough sleepers can be reluctant to accept referrals to services as previous referrals may not have assisted them or they do not trust the service. Furthermore, rough sleepers can suffer complex trauma and find it difficult to self-refer. Councils report that successful support of a person experiencing homelessness often requires intensive outreach over a period to build trust before the person will consider offers of help or housing. Therefore, the Housing Strategy should include support for services to conduct assertive outreach. Another key impediment to housing people experiencing homelessness is whether these service providers have the resources and

¹⁴ Available online at:

https://lgnsw.org.au/common/Uploaded%20files/Submissions/Inquiry_into_the_Protocol_for_Homeless_People_in_Public_Places.pdf

capacity to take new referrals. In the absence of appropriate services, well-intentioned members of the public or charities may try to provide assistance to homeless people, but they may engage in an unsafe manner or enable homelessness, rather than addressing needs through a Housing First approach.

LGNSW welcomes the Discussion Paper acknowledging that a Housing First model is effective when tackling homelessness, particularly for people with complex needs. LGNSW has previously called for the Housing First principle to be implemented across NSW. This model prescribes safe and permanent housing as the first priority for people experiencing homelessness, driven by a guiding principle that safe and secure housing should be quickly provided prior to, and not conditional upon, addressing other health and well-being issues.

The underlying drivers of homelessness must be recognised in the Housing Strategy and addressed by government at the same time as taking steps to reduce homelessness. The range of drivers include many factors such as drug, alcohol and gambling addiction; mental illness; family breakdown; shortage of stable and affordable housing; financial or housing stress; health issues; long term unemployment; family and domestic violence; loss of social and family networks; and people leaving healthcare services, child protection and correctional facilities without long term housing arrangements in place.

Recommendation 12

The Housing Strategy should commit the NSW Government to the Housing First approach.

Recommendation 13

The Housing Strategy should complement the NSW Homeless Strategy 2018-2023 and contribute to the Premier's Priority to reduce street homelessness across NSW by 2025.

Crisis accommodation, rehabilitation and domestic violence

There is an urgent need for increased availability of specialist short term accommodation across NSW to respond to a diverse range of causal factors including domestic violence, natural disasters and alcohol and other drug rehabilitation.

Following the severe impact of the 2019/20 bushfires, more than 5.5 million hectares (6.2% of the state) burnt and 2,448 homes were destroyed. In some of the affected local government areas there were examples of insufficient or inadequate interim housing available to locate people close to their communities.

Where accommodation is a significant distance from their original communities, there is a risk that people may need to change jobs or schools. If these people do not return to the location of their previous home, the future viability of their community is threatened. LGNSW has called for the NSW Government to address a lack of appropriate interim housing for displaced people and welcomed the Deputy Premier's 10 March 2020 announcement of 100 standalone temporary accommodation pods, provided in partnership with the Minderoo Foundation, to ensure people could remain living near to their communities, workplaces, schools and support networks¹⁵.

¹⁵ Further information on temporary accommodation pods available at: <https://www.minderoo.org/fire-fund/news/bushfire-victims-to-benefit-from-ramp-up-in-recovery-pods-for-nsw/>

It is critical that the Housing Strategy highlights the need for temporary accommodation in similar scenarios and provides for the NSW Government to rapidly act to address this urgent need as it arises.

Recommendation 14

The Housing Strategy should commit the NSW Government to ensuring that temporary accommodation arrangements are available to be provided rapidly and at sufficient scale to ensure bushfire and disaster affected people can remain close to their communities, workplaces, schools and support networks.

Councils have also highlighted through resolutions of the LGNSW Annual Conference that outside of disaster situations, there is a critical shortage of crisis accommodation – particularly in regional areas and for youth. Many local government areas in rural and remote regions have no facilities to assist youth in crisis. The NSW State Budget 2019/2020 included \$3.3 million in 2019-20 to support the construction of Grace’s Place, a residential recovery centre, to help children and young people through the trauma of losing a loved one due to homicide. On 4 December 2019 the NSW Government also announced construction of a 73 unit housing complex in Sydney to deliver improved support for young people leaving out of home care. These are useful facilities but are both based in Sydney. Similar facilities are needed in rural and regional areas.

Further, a severe lack of drug treatment and rehabilitation facilities is placing lives at risk and leading to the incarceration of those who would be better served by suitable treatment options. At the 2019 LGNSW Annual Conference councils called for the NSW Government to provide greater investment in initiatives such as detox and residential rehabilitation and treatment programs as alternatives to incarceration. The NSW Government recently shut down facilities like the low security Yetta Dhinnakkal Centre in Brewarrina Shire and the Ivanhoe Warrakirri Correctional Centre in Central Darling Shire. These rural facilities had a positive approach to rehabilitation. The Yetta Dhinnakkal Centre, for example, delivered tailored programs targeting first-time young Aboriginal offenders through culturally relevant intensive case management. The Housing Strategy could promote investigating the possibility of repurposing facilities like these as drug and alcohol rehabilitation facilities

Councils with diverse demographics such as multicultural communities, LGBTIQ+ communities, and large populations of young adults advise that targeted domestic violence support is needed for those communities, as they can have difficulties when accessing services for women. For this reason, there is a shift in the sector to refer to *Domestic and Family Violence*, or *Gender Based Violence* to broaden the perception of who is a victim.

Services for children and pets are crucial in supporting victims of domestic violence. When victims know that there are safe accommodation options for their dependants, they are more likely to seek help. Domestic Violence NSW is currently conducting a survey of providers to gauge the gaps in service delivery in catering to pets to understand the role this plays in ensuring those affected by domestic and family violence can access the supports they need.

Further, young people escaping domestic violence can find themselves placed alone in motels or caravans. Urgent action is needed to ensure suitable crisis accommodation options for young people before they face the prospect of homelessness.

Recommendation 15

The Housing Strategy should incorporate a targeted approach to increasing crisis accommodation options and options for increased provision of rehabilitation centres, prioritising local government areas currently lacking any appropriate facilities.

Those with complex needs

There are inadequate services available to refer individuals experiencing co-morbidity issues. That is, people with the co-occurrence of one or more disorders including drug usage and mental health issues. Often these individuals cannot qualify for crisis accommodation or other housing options while they are using illicit drugs. Further, councils have found that NSW Health Mental Health Outreach will not attend nor refer if drug use is perceived as the primary issue. If these services cannot assist in instances of complex co-morbidity, greater resources are needed for specialist mental health service providers to enact a joint response. Ideally, these services would be centrally located to not only better enable integrated support, but also improve access for people who are homeless. Co-location assists in addressing the difficulties people experiencing homelessness face when trying to access transport to essential services.

Recommendation 16

The Housing Strategy should commit to greater resources and co-location of support services for individuals experiencing co-morbidity issues that have an adverse impact on their ability to access suitable housing.

Theme 3: Housing with improved affordability and stability

While responsibility for social and affordable housing provision lies primarily with state and Commonwealth governments, councils can and do contribute to supply of affordable housing through the planning system and in other ways. More can be done to facilitate councils to deliver affordable housing through the planning system.

Affordable housing schemes, incentives and voluntary planning agreements

LGNSW supports the GSC's inclusion of an affordable housing target in the Greater Sydney Region Plan and District Plans. These plans set an affordable housing target of between 5% and 10% of all new floorspace in land release and urban renewal areas (subject to viability). The target is a welcome start and should be introduced as a measurable commitment in the NSW Housing Strategy. For some years, councils have been calling for an agreed minimum target and tangible policy mechanisms that will facilitate delivery of affordable rental housing. As stated earlier in this submission, LGNSW policy includes a recommendation for an affordable housing target of 25% of development on government-owned land.¹⁶

Some councils are of the view that the GSC's targets do not go far enough and have alternative approaches. Affordable housing targets should be determined in consultation with councils at the same time the overall housing targets for a district or region are being determined.

¹⁶ https://www.lgnsw.org.au/Public/Policy/Policy-Platform/Public/Policy/Policy_Platform.aspx?hkey=4cd76f65-089a-401d-906d-63431b9f6661 (p 13)

In the context of affordable housing, targets would help to articulate and deliver councils' affordable housing objectives. The publication of clear targets would have the secondary benefit of indicating to private industry a council's commitment to affordable housing, allowing developers and community housing providers to plan future projects with more certainty and confidence.

DPIE and the GSC should work proactively and collaboratively with LGNSW, councils and the relevant State agencies and housing bodies to agree on specific affordable housing targets and how these can be delivered at a district regional and local level.

A clear affordable housing planning framework is required to enable councils and others to meet the targets set out. The inclusion of all councils in State Environmental Planning Policy 70 (Revised Schemes) (SEPP 70) and the development of a template are welcome developments, however there is significant scope for improving the system.

LGNSW understands that, despite councils' best efforts, implementing schemes for affordable housing through the development of planning proposals has often taken two years or more. Further, there has been a lack of clear policy advice and responses from the state government when proposals have been submitted by councils. Some, such as a planning proposal by the City of Ryde Council, remain in the system. Moree Plains has also sought changes to enable approval of affordable housing forms with no response from the state government.

Some councils have implemented voluntary planning agreements (VPAs) for affordable housing and LGNSW notes that guidelines for VPAs are currently under review by DPIE. LGNSW also understands that planning agreements more broadly are being considered in the NSW Productivity Commissioner's review of infrastructure contributions. It is important that these planning tools support opportunities for value capture for affordable housing (and other infrastructure). The NSW Housing Strategy should draw on the findings of this work.

Many councils are disappointed that the delay in expanding SEPP 70 and lack of a clear framework at a time when there has been significant residential development (particularly in the metropolitan area) has resulted in missed opportunities to deliver affordable housing.

Recommendation 17

That the NSW Housing Strategy:

- introduces clearly stated minimum targets for affordable housing of 5 - 10% in line with Greater Sydney Commission recommendations and 25% on government owned land; and
- establishes a clear and transparent framework for local councils and the State Government to set targets for affordable housing and develop schemes to implement them.

Theme 4: Responsive and resilient housing

LGNSW welcomes the discussion and focus on the importance of providing housing that incorporates ecologically sustainable design, is climate resilient including for extreme weather events, that minimises environmental impacts and is comfortable for people to live in.

Climate resilience

A number of strategies are required to reduce the risk of climate change impacts including appropriate site selection and planning controls to reduce climate hazards, consideration of building materials, and improved landscaping to ameliorate drought and heat wave impacts. These strategies must factor in the gradual change in climate as well as more frequency and severe extreme weather.

The 2019-2020 bushfires were unprecedented in their scale, with 50 of NSW's 128 local government areas subject of natural disaster declarations. The NSW Independent Bushfire Inquiry will be making recommendations on land use planning and management and building standards, clearing and hazard reduction and zoning. It is important that actions within the NSW Housing Strategy align with the outcomes of this Inquiry.

Recommendation 18

That the NSW Housing Strategy take into consideration the findings of the NSW Independent Bushfire Inquiry.

Ecologically sustainable housing development

LGNSW supports the NSW Housing Strategy to minimise environmental harm through resource efficiency. However, this is only one aspect of an ecologically sustainable approach. Sustainable housing considers the design (including site selection), construction and operation of the house over its lifetime. Other aspects to consider include economic sustainability such as materials cost, utilities, maintenance, resale value etc as well as social sustainability aspects such as aesthetics, security, functionality, future modifications and liveability.

The NSW Government approach to increase resource efficiency in housing is through the Building Sustainability Index (BASIX) SEPP. NSW local governments have long advocated for the review of the energy and water efficiency targets as well as the expansion of targets to address other resource and liveability outcomes.

The National Energy Efficient Building Project identified that most stakeholders believe undercompliance with building energy efficiency requirements is widespread across Australia. LGNSW recommends that BASIX compliance be funded to ensure the integrity of the program and that efficiency targets are realised. This could involve random sampling by the BASIX Assessor Accrediting Organisations.

Recommendation 19

That the NSW Government improve sustainability outcomes in housing by increasing BASIX targets and extending targets to cover additional resources and liveability outcomes and improve BASIX compliance.

Waste services and infrastructure

The provision of garbage (waste) services is listed in the *Essential Services Act 1988* along with energy supply, public transportation, public health services and water supply. It is an essential service that is delivered almost solely by local government in collaboration with the private sector. The NSW Housing Strategy offers no consideration of waste management in the design, construction or operation of housing. Despite household waste contributing to 33% of the total waste in NSW, the provision of waste services and associated infrastructure is often overlooked in the design of new housing. There are numerous examples of inadequate provision of waste infrastructure within multi-unit developments preventing residents from disposing of waste and recycling efficiently and of waste service vehicles unable to access waste storage areas in units and subdivisions. This has resulted in some councils unable to provide waste services to residents.

When waste infrastructure is not considered at the design and construction phase, amenity and safety are often impacted. It also leads to poor environmental outcomes through insufficient waste stream separation and recycling.

It is important that the NSW Housing Strategy escalate waste and recycling provisions to ensure that residents can access this essential service. LGNSW recommends a planning instrument (such as the proposed new Design and Place SEPP) that mandates best planning waste management into the design and construction phases.

Recommendation 20

That the NSW Housing Strategy provide provisions to ensure adequate and efficient waste and recycling services through inclusion in the strategy as well as the development of an effective planning instrument mandating best practice waste management.

Circular economy

The NSW Government defines a circular economy as keeping products and materials in use for as long as possible. Maximising the use and value of resources brings major economic, social and environmental benefits. It contributes to innovation, growth and job creation, while reducing impacts on the environment.

There is opportunity to develop a circular economy in the housing market through:

- The recycling and reprocessing of construction and demolition waste (37% of total waste in NSW).
- Development of policies and procedures that require the investigation of recycled content substitutes and their availability in all procurement decisions.
- Housing and precincts that adopt a closed loop approach where possible such as organics being processed and used onsite, water recycling etc.
- Provision of facilities at a precinct level to provide reuse and repair facilitates, further collection points for source separation of recyclables (beyond kerbside recycling), drop off centres or community hubs to “bulk up” waste to reduce traffic congestion and improve cost recovery. For example, the Melbourne lane ways project include anaerobic digestors, glass crushing equipment to allow processing or bulking up near the generation site.

Recommendation 21

That the NSW Housing Strategy apply the NSW Government's Circular Economy Policy in housing supply.

5.0 Conclusion

Developing a Housing Strategy for NSW provides an important opportunity to commit to a partnership approach to develop effective responses to housing need for all in NSW and across the housing continuum. It also offers a timely juncture to ensure greater alignment of the many state-level policies and objectives the influence and intersect across the entire housing continuum are aligned.

A summary of recommendations is provided in Appendix 1.

To discuss this submission further, please contact Jane Partridge, Strategy Manager, Planning and Transport at Jane.Partridge@lgnsw.org.au

Appendix 1 - Summary of Recommendations

Recommendation 1

That the NSW Housing Strategy establishes a strong governance framework that supports a genuine partnership with local government and effective collaboration to develop and implement the Action Plan for the strategy.

Recommendation 2

That the NSW Housing Strategy: recognises the primary responsibility of local government in planning for housing at the local level, ensures that planning system reforms and changes are co-designed with councils and provides a clear framework for endorsement of Local Housing Strategies.

Recommendation 3

That the NSW Housing Strategy establishes a clear framework for review of housing supply targets which includes concurrence with local government areas in setting these targets.

Recommendation 4

The NSW Housing Strategy include as additional outcomes: housing growth that is supported by equitable and efficient funding of infrastructure and that contributes to place-making and the safety and quality of the built-form.

Recommendation 5

The NSW Housing Strategy introduce minimum targets of 5-10% social and affordable housing across NSW and 25% for government-owned land, and commit to providing the requisite responsibility/resources within State Government and relevant agencies (e.g. DPIE, GSC, Infrastructure NSW, DCJ) to delivering policies and plans to meet these housing needs.

Recommendation 6

The NSW Government finalise a regulatory framework for short-term rental accommodation that provides flexibility for councils to manage the impacts at a local level so that they can balance important affordability and housing supply and amenity impacts with economic benefits.

Recommendation 7

That the NSW Housing Strategy undertake a comprehensive review of housing-related SEPPs and make it standard practice to include review mechanisms to measure their effectiveness and impact.

Recommendation 8

The NSW Housing Strategy should include a clear outline of the rights, roles and responsibilities of key government and non-government stakeholders in addressing housing security.

Recommendation 9

LGNSW calls on the NSW Housing Strategy to emphasise the NSW Government working with Aboriginal communities, organisations and local government to set clear targets to reduce housing disadvantage impacting Aboriginal people in NSW.

Recommendation 10

The NSW Housing Strategy should incorporate:

1. a regulatory approach to make new housing accessible to everyone,
2. an agreed definition of accessibility to be developed and legislated which incorporates consideration of universal design principles, and
3. mandating minimum accessibility standards to be at the Liveable Housing Australia (LHA) Design Guidelines Gold Level (Option 3) or an equivalent standard at this level or higher.

Recommendation 11

LGNSW would also welcome the NSW Housing Strategy linking and aligning with the new NSW Ageing Strategy and the National Disability Strategy, both of which are currently under review.

Recommendation 12

The NSW Housing Strategy should commit the NSW Government to the Housing First approach.

Recommendation 13

The NSW Housing Strategy should complement the NSW Homeless Strategy 2018-2023 and contribute to the Premier's Priority to reduce street homelessness across NSW by 2025.

Recommendation 14

The NSW Housing Strategy should commit the NSW Government to ensuring that temporary accommodation arrangements are available to be provided rapidly and at sufficient scale to ensure bushfire and disaster affected people can remain close to their communities, workplaces, schools and support networks.

Recommendation 15

The NSW Housing Strategy should incorporate a targeted approach to increasing crisis accommodation options and options for increased provision of rehabilitation centres, prioritising local government areas currently lacking any appropriate facilities.

Recommendation 16

The NSW Housing Strategy should commit to greater resources and co-location of support services for individuals experiencing co-morbidity issues that have an adverse impact on their ability to access suitable housing.

Recommendation 17

That the NSW Housing Strategy:

- introduces clearly stated minimum targets for affordable housing of 5 - 10% in line with Greater Sydney Commission recommendations and 25% on government owned land; and
- establishes a clear and transparent framework for local councils and the State Government to set targets for affordable housing and develop schemes to implement them.

Recommendation 18

That the NSW Housing Strategy take into consideration the findings of the NSW Independent Bushfire Inquiry.

Recommendation 19

That the NSW Government improve sustainability outcomes in housing by increasing BASIX targets and extending targets to cover additional resources and liveability outcomes and improve BASIX compliance.

Recommendation 20

That the NSW Housing Strategy provide provisions to ensure adequate and efficient waste and recycling services through inclusion in the strategy as well as the development of an effective planning instrument mandating best practice waste management.

Recommendation 21

That the NSW Housing Strategy apply the NSW Government's Circular Economy Policy in housing supply.

Appendix 2 - LGNSW Conference Motions

Advocacy from councils to address housing issues

As shown by the following resolutions made at the 2018 and 2019 LGNSW Annual Conferences

73 Griffith City Council – Affordable housing and homelessness

That Local Government NSW endorses the 'Everybody's Home Campaign' to end homelessness and provide affordable housing for all Australians. This issue was also raised by Tweed Shire and Shoalhaven City Councils

Covered by resolution 73

Tweed Shire Council – Homelessness: additional social housing

That Local Government NSW lobbies the NSW Government to address as a State issue that requires a strategic targeted response across the continuum of crisis, short term and longer term solutions.

Shoalhaven City Council – Homelessness support programs

That the NSW Government provide greater funding, and implement support programs, to address homelessness in communities across the State.

74 Bega Valley Shire Council – Youth crisis accommodation

That Local Government NSW lobbies the Departments of Health and Housing to establish a fund for youth crisis accommodation, prioritising local government areas currently lacking any appropriate facilities to alleviate this crisis.

101 Cumberland Council – Homelessness

That Local Government NSW advocates for the NSW Government to actively lead and contribute to the implementation of initiatives to combat the homelessness crisis in NSW, including funding for local government to deliver initiatives at the local level.

Covered by resolution 101

Kyogle Council – Social housing stock deficits in regional NSW

That Local Government NSW calls on the NSW Government to provide funding to address social housing stock deficits in the regions, to raise regional housing stock levels up to the state average.

Forbes Shire Council – Further awareness of homelessness in rural areas

That the NSW Government recognises that homelessness is not just an urban issue, and increase funding for homelessness support in rural areas.

37 Bega Valley Shire Council – Consistent definition of tiny houses

That Local Government NSW calls on the NSW Government to amend the Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005 to include a definition of tiny houses in NSW planning legislation, to offer a flexible, legitimate housing model.

38 LGNSW Board – Review of state policies on housing

That Local Government NSW calls on the NSW Government to

1. Review all housing-related State Environmental Planning Policies (SEPP's so they allow for locally based planning to occur in line with the new emphasis on local strategic planning in the Environmental Planning and Assessment Act 1979.
2. Urgently progress its comprehensive review of all state policies, giving priority to the following housing related SEPP's (so that local housing solutions aren't undermined):
 - a) State Environment Planning Policy (Affordable Rental Housing 2009)
 - b) State Environment Planning Policy (Exempt and Complying Development Codes) 2008
 - c) Draft State Environmental Planning Policy (Short-term Rental Accommodation) 2019
 - d) State Environment Planning Policy (Sydney Regional Growth Centres) 2006
 - e) State Environmental Planning Policy (Housing for Seniors People with a Disability) 2004

This issue was also raised by Liverpool City, Penrith City, Hunters Hill, Tamworth Regional, Central Coast and Strathfield Councils

41 Wingecarribee Shire Council – Review of developer contributions system

That the NSW Government undertakes an urgent holistic review of the developer contributions system in NSW, with the aim of reducing the financial burden placed on councils in providing infrastructure to support population growth and/or the changing needs of communities throughout NSW.

Supporting/related amendments

Liverpool City Council – Controls for boarding houses

That Local Government NSW calls upon the NSW Government for an amendment to the Standard Instrument (Local Environmental Plans) Order 2006 to allow council to determine whether boarding houses are a permissible land use in certain residential zones.

Penrith City Council – Exemption - boarding house provisions

That Local Government NSW writes to the Minister for Planning and Public Spaces requesting that Division 3 Boarding Houses of the Affordable Rental Housing SEPP 2009 be amended to allow councils to be exempt from this division under the policy.

Hunters Hill Council – Local application of Housing Codes

1. That Local Government NSW writes to and engages with the Minister for Planning and Public Spaces, advocating that:
 - a) Legislation be amended as required to allow Local Environmental Plans (LEPs) to:
 - (i) Exclude the operation Parts 3, and 3B of the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 ('Codes SEPP') from application in parts of the Local Government Area (LGA) to which the LEP applies; and
 - (ii) Apply controls in addition to the controls of the relevant Code in parts of the LGA in which Parts 3 or 3B of the Codes SEPP are to apply.
 - b) Deferral of the Codes SEPP Part 3B Low Rise Medium Density Housing Code continue at least until there has been a reasonable opportunity for:
 - (i) Councils to review their LEPs and prepare planning proposals to give effect to their Local Strategic Planning Statements; and
 - (ii) Local plan-making authorities to amend councils' LEPs in line with councils' planning proposals.
2. To avoid doubt, with regard to 1(a) above, it is intended that controls in LEPs would not permit complying development where it is excluded by Part 1 Division 2 of the Codes SEPP.

Tamworth Regional Council – Low Rise Medium Density Housing Code

That Local Government NSW requests the NSW Government to provide extended deferral of the Low Rise Medium Density Housing Code until councils have completed Local Housing Strategies, Local Strategic Planning Statements and Local Environmental Plans at the least to December 2021.

Central Coast Council – Short Term Rental Accommodation

That Local Government NSW calls on the NSW Government to:

- a) Allow all local government areas to prepare their own Planning Proposals to manage short term rental accommodation needs in their areas.
- b) Investigate and consult with councils regarding new powers for councils to manage complaints and other issues relating to the operation of short term rental accommodation.

Strathfield Council – Affordable rental housing

That the NSW Government amends the Affordable Housing SEPP 2009 to require all owners of affordable rental housing units provided within a residential unit development to submit to their consenting council an annual independent audit report, prepared by a professional planner accredited by the Planning Institute of Australia, certifying ongoing compliance with the conditions of consent, verify the number of affordable units relating to the affordable rental units within the approved complex.

10 Penrith City Council – Boarding houses

That Local Government NSW writes to the Minister for Planning and Environment requesting that the boarding houses division of the State Environmental Planning Policy (Affordable Rental Housing) 2009 (the SEPP) be amended. It is proposed that the amendments include:

- Requirement for a social impact study to be submitted with boarding house applications.
- Enabling councils to refuse development consent in certain circumstances, for example, when boarding houses are proposed in inappropriate locations without adequate access to public transport, services and jobs.
- Removal of the words “not more than” from Division 3, Clause 29 Section 2.e.iii “in the case of any development - not more than 1 parking space is provided for each person employed in connection with the development and who is resident on site.”
- A minimum percentage of affordable rental housing in boarding houses.
- Objectives and actions for monitoring the effectiveness of boarding houses in contributing to the supply of affordable rental housing.

This issue was also raised by Cumberland, Willoughby City, and Wingecarribee Shire Councils

65 Lane Cove Council – Housing for seniors or people with a disability SEPP

That Local Government NSW calls on the NSW Government to review the Housing for Seniors or People with a Disability SEPP which is now 14 years old, in particular to remove inconsistencies with other planning instruments, definitions and requirements as follows:

- Zoning and site compatibility requirements for locating the developments.
- The definition of what is included in the calculation of Gross Floor Area, which is inconsistent with the standard instrument Local Environmental Plan.
- The need for design and amenity standards consistent with the Apartment Design Guide.
- The operation and ownership of the Affordable Housing Bonus component.

72 City of Sydney – Housing affordability

That Local Government NSW notes:

- a. there is a crisis of housing affordability in NSW, creating unique challenges for both regional and urban areas; and
- b. local government has a key role to play in the easing of this crisis, and in supporting the creation of affordable housing.

That Local Government NSW resolves:

- c. to support the development of affordable housing targets of 25% on government owned land, and the establishment within 12 months of an effective mechanism of inclusionary zoning for privately developed land that responds to local need and context;
- d. to lobby the NSW Government on the issue of affordable housing, expressing the above view; and
- e. to develop strategies to support local councils in NSW in increasing affordable housing in their local government areas.

This issue was also raised by North Sydney Council.

59 Board – Climate change

That the NSW Government be called upon to deliver on their climate change policy framework and develop programs with tangible outcomes to meet the aspirational long-term objectives of achieving net-zero emission by 2050 and a community more resilient to a changing climate.

This includes initiatives to:

- Update State Environmental Planning Policies to achieve improvements in liveability and sustainability of housing to:
 - ensure developments and precincts include measures to alleviate the urban heat island effect.
 - apply higher Building Sustainability Index (BASIX) targets and include other sustainability outcomes.
 - enable innovative approaches to community and public transport.

improve provisions to ensure the resilience of housing stock.

- Provide greater support to local government for coastal management especially in areas experiencing erosion exacerbated by state and federal infrastructure e.g. airports, ports and breakwaters.
- Set a renewable energy target of 40% by 2025 to support investment and market confidence in renewable energy projects.
- Support the community and business build resilience to current and future climate risks.

This issue was also raised by Albury City, Bayside, Bellingen Shire, Orange City, Shoalhaven City, Hornsby Shire, and Wollondilly Shire Councils

74 Mosman Municipal Council – Encourage uptake of electric vehicles

That Local Government NSW lobbies the Federal Government and NSW Government to encourage the uptake of electric vehicles through appropriate investment, concessions and with legislative support of charging and parking infrastructure in new residential and commercial developments.