

**City of South Perth
Draft Local Housing Strategy
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Name: Chantal Roberts
Executive Officer

Organisation: Shelter WA

Address: 33 Moore Street East Perth 6004

Email: eo@shelterwa.org.au

Phone: (08) 9325 6660

Fax: (08) 9325 8113

Website: www.shelterwa.org.au



About Shelter WA

Shelter WA is an independent community based organisation committed to the principle of accessible, affordable, appropriate and secure housing for every person. Shelter WA focuses on people who have low incomes or who are otherwise disadvantaged in the housing market. This includes people who are homeless or who are at risk of homelessness.

Our role is to give an informed voice on housing policy issues based on sound research, close collaboration and consultation with housing consumers and community based organisations working with housing and related issues. We promote housing options for people on low incomes, including social housing (public housing and community housing), affordable housing provided through the private sector and affordable home ownership.

Introduction

Shelter WA recognises that planning plays a central role in the supply and availability of affordable housing. Clear planning mechanisms are needed to ensure that increased supply is affordable for low and moderate income households. Without specific provisions for additional dwellings to target these households, we run the risk of increasing density without increasing the social and economic mix needed for the health and vitality of our communities.

Long term residents, families and generations who remain stable in a location over a long period of time have many benefits for communities and local regions. Maintaining family and social network connections, by ensuring a region is furnished with diverse dwelling forms and sufficient affordable housing options across all tenures (i.e. home-ownership, private rentals, social housing, crisis accommodation) are required to accommodate people for short or longer periods at different points in their lives or 'housing careers'.

As the population of Perth increases, affordable housing will be needed for a range of household types and sizes. Key workers, including nurses, police officers and teachers, as well as tradespeople, shop assistants and hairdressers need affordable housing close to where they work. Households with complex housing needs such as a child with a disability or responsibility for in-home care provision to frail older relatives also require some place to live that is safe, well-located, in close proximity to health services and affordable. Similarly, aging parents caring for an adult child with disabilities, a parent with children seeking to rebuild their lives after a relationship break-down or following domestic violence all need safe and secure accommodation. These families are unlikely to be able to find appropriate and affordable accommodation near essential services or adequate public transport in the current private rental market.

Local governments can use specific planning mechanisms to facilitate the development of affordable accommodation. The City of Perth Draft Local Housing Strategy takes steps to facilitate and encourage the provision of affordable housing, particularly in the Special Control Area, where it is most needed. Shelter WA welcomes the opportunity to comment on The City of South Perth's Local Housing Strategy.

Comments

Shelter WA supports the key components of the strategy to:

- Investigate increased densities around locations of diverse land uses serviced by high frequency public transport.
- Facilitate residential development in close proximity to public transport, as well as changing the focus on car parking requirements in these locations.
- Deliver affordable housing options for low-moderate income earners in activity centres.
- Broaden the style of housing available in the City to accommodate a diverse and growing population.
- Encourage redevelopment as a tool to achieve high quality built outcomes and improved access to developments.
- Simplify residential densities across the City.
- Review dual density codings in regulating residential development.
- Facilitate sustainable residential development.

Shelter WA supports the strategy's approach to increasing housing diversity, removing barriers to the provision of affordable housing, and increasing density close to public transportation and other amenities.

In section 4.2 on Special Control Area Provisions, the draft contains actions to encourage affordable housing, capped car parking, adaptable housing, and accessible housing. To further strengthen this section, Shelter WA makes the following recommendations.

Recommendation 1: Define affordable housing

We propose it would be useful to define affordable housing within the Local Housing Strategy. This is to provide clarity around different types of housing which meet the affordable housing criteria. It also serves to ensure all affordable housing does not fall into one category or another, but rather provides a diverse mixture of affordable housing options within the City. It may be practical for the City to consider adopting the two-pronged definition used by the East Perth Redevelopment Authority (EPRA) for social housing and market housing, below:

- *Social Housing: This includes social and special needs housing and is facilitated through the sale of land to the Department of Housing or not-for-profit organisations. These organisations develop land to provide submarket rental housing to low income or special needs groups.*
- *Market Housing: This includes open market housing; providing housing at the lower end of the market and long-term rental housing. Under this tier, the City of South Perth could facilitate the delivery of long-term rental housing at market rates using a restrictive covenant placed on the Certificate of Title that requires units to be retained as rental housing for a minimum of 10 years.*

Recommendation 2: Provision for utilising developer contributions for affordable housing

In 4.2.1 on developer contributions, Shelter WA recommends including a statement that funds collected from developer contributions will be utilised for the provision of affordable housing. The City would need to work with the Department of Housing and/or community housing providers to ensure developer contributions related to affordable housing are spent on affordable housing, and not absorbed into general funds. In figure 4.2.1 it is unclear if the funds received as part of Option A are earmarked for affordable housing and if so, how those funds will be allocated.

Recommendation 3: Clarify roles of responsibility regarding the 15% and report on progress

Shelter WA strongly supports the inclusion of the 15% affordable housing target in the South Perth Station Special Control Area. Providing a density bonus is an appropriate mechanism to provide an incentive for developers to increase the supply of affordable housing. In that section of the plan (p.8) it would be useful to clarify how the 15% target will be reached. For example, how will the City guarantee that the housing will be affordable in perpetuity? The EPRA definitions above may be useful to clarify the different types of affordable housing and how those affordable housing targets will be met (i.e. developers selling units to the Department of Housing or community housing providers at cost).

It would also be useful to have a reporting mechanism to track developers' use of Option A and Option B, and the number of affordable units developed as part of Option B.

Recommendation 4: Include affordable rentals in 15% target

On the bottom of Page 9 of the strategy, it states "The sale of affordable units to the Department of Housing, and their on-sale to consumers under a shared-equity arrangement..." Shelter WA supports schemes to encourage affordable home ownership. We would also encourage the provision of affordable rentals. Consider adding "The sale of affordable units to the Department of Housing for rentals or through their on-sale to consumers under a shared-equity arrangement..."

Recommendation 5: Ensure some accessible housing is also affordable

Shelter WA supports the inclusion of accessible housing in the Special Control Area. We would also encourage that some of that accessible housing is also included in the 15% affordable housing target. As the population ages, we can expect a greater need for accessible, affordable housing in areas close to public transport and other amenities.

Conclusion

Shelter WA commends the City of South Perth for encouraging, facilitating and emphasising affordable housing in its Draft Local Housing Strategy. The Draft Local Housing Strategy provides a clear message to developers and the public that housing diversity, including affordable housing, is a necessity to ensure the health and vitality of the future of the City of South Perth. Our communities are stronger when everyone is able to acquire safe, secure, and affordable housing. The Draft Local Housing Strategy will provide the guidance necessary to ensure affordable housing is a key feature in the future planning of the City of South Perth.