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## Creating for Generations

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25 August 2020

Hamish McNulty  
General Manager  
Cumberland City Council  
PO Box 42  
MERRYLANDS NSW 2160

Email – [Council@Cumberland.nsw.gov.au](mailto:Council@Cumberland.nsw.gov.au)

Dear Mr McNulty

### Cumberland Affordable Housing Strategy (Council Ref: CS-206)

The Property Council of Australia welcomes the opportunity to provide comments to Council on the draft Affordable Housing Strategy (draft Strategy).

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes. We are pleased to provide the following comments for your consideration.

As Council would be aware, the Department of Planning, Industry and Environment (DPIE) recently sought feedback on a discussion paper to inform the development of a Housing Strategy for NSW. There is also the exhibition of an Explanation of Intended Effects for a Housing Diversity SEPP underway. Both documents are relevant to Council's draft Strategy and we ask that Council take them into consideration as part of this process.

Council is to be congratulated for developing an affordable housing strategy that aligns with the Council's Local Strategic Planning Statement (Local Planning Priority 6), made in March 2020. Council's draft Local Housing Strategy, that was exhibited in March 2020, also identified the need for more diverse housing within the Cumberland LGA. However, whilst these strategic plans are important steps in delivering policy outcomes, it should not be underestimated the urgent need for more affordable housing to be provided to meet future demand in the Cumberland LGA.

As stated (p10), approximately 20% of households in the LGA are experiencing housing stress, which is one of the highest levels in the Central City District and across the Greater Sydney region. There are many factors contributing to this problem, including a supply shortage of affordable housing. Highlighting the shortfall in supply, Section 2.5 of the draft Strategy has identified that more than 10,700 additional affordable housing dwellings will be needed within Cumberland between 2016 and 2036. Council has identified around 6,000 and 7,000 additional dwellings in the current development pipeline, which leaves a gap of between 3,700 and 4,700 dwellings.

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Council has forecast the current pipeline of affordable housing within the LGA will take the form of social housing (21%), affordable rental housing/seniors housing and boarding houses (19%) and secondary dwellings/dual occupancies (60%). It is important that Council assess future need for affordable housing to ensure that the type and tenure of future affordable housing stock will meet future need. As such, we recommend a range of measures (contained herein) that require urgent attention, and aligned against the proposed Council priorities and actions.

Should you have any questions regarding the content of this submission do not hesitate to contact Troy Loveday, NSW Policy Manager, on 0414 265 152 or [tloveday@propertycouncil.com.au](mailto:tloveday@propertycouncil.com.au)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Belinda Ngo', with a stylized, cursive script.

**Belinda Ngo**  
**Acting NSW Executive Director**  
**Property Council of Australia**

Priorities	Actions	Property Council Response
Priority 1 - Planning Controls that contribute to affordable housing feasibility and delivery	<p>Action 1.1 - Progress the review of planning controls for key centres and corridors, with consideration of development feasibility, housing mix and parking requirements to facilitate delivery of affordable housing.</p> <p>Action 1.2 - Input from Council's Design Excellence Panel, resulting in improved design of affordable housing at the development assessment stage.</p> <p>Action 1.3 - Review planning controls to ensure alignment with any affordable housing policy changes as required.</p>	<p>These actions are appropriate in principle, however, the planning controls and how they assist in delivery of more affordable housing is critical detail missing from the Strategy. We also recommend that timeframes for engagement on the right planning control adjustments is essential, given the complexity and time frames associated with such broad reforms. We welcome the opportunity for further engagement on these proposed changes.</p>
Priority 2 – Policy Initiatives which support the delivery of affordable housing.	<p>Action 2.1 - Review and update Council's Interim Affordable Housing Policy.</p> <p>Action 2.2 – Continue to seek affordable housing outcomes through planning agreements</p> <p>Action 2.3 – Continue to collaborate with State Government, and advocate for, improvements to the ARH SEPP, Seniors SEPP and SEPP 70 – Affordable housing.</p>	<p>Council would be aware that an Explanation of Intended Effects to prepare a Housing Diversity SEPP is currently on exhibition. This includes the Affordable Rental Housing ASEPP, Seniors Housing SEPP and SEPP 70.</p> <p>We cautiously support the GSC's affordable housing targets and encourage Council to work closely with DPIE and the GSC on developing plans and timeframes to implement those targets.</p>
Priority 3 - Effective collaboration with key stakeholders to maximise delivery of affordable housing on the ground.	<p>Action 3.1 – Work collaboratively with public and private housing providers to facilitate the delivery of social, affordable and community housing, through strategic planning and other incentives.</p> <p>Action 3.2 – Collaborate with key partners, including community housing providers, in the planning and delivery of Council-led redevelopment, and consider opportunities for provision of affordable housing.</p> <p>Action 3.3 – Progress the Cumberland Homeless Sector Action Plan.</p>	<p>We generally support these actions and encourage Council to demonstrate leadership to facilitate collaborations / joint ventures between public, community and private housing providers to facilitate social, affordable and community housing where and when it is needed. Opportunities to develop Council owned land in particular should be explored.</p>

<p>Priority 4 - Continued advocacy with all levels of government and the community to facilitate greater provision of affordable housing.</p>	<p>Action 4.1 – Continue with State and Federal government advocacy, focused on policy improvements and direct investment in affordable housing.</p> <p>Action 4.2 – Work with community housing providers, peak bodies and other specific industry groups to collaboratively advocate on specific aspects of affordable housing provision as they arise.</p> <p>Action 4.3 – Promote and showcase examples of different types of affordable housing in Cumberland City, to foster excellence and innovation in delivery and address community misconceptions on this form of development.</p>	<p>We support Council taking further steps to implement these actions.</p> <p>Demonstration precincts which bring community housing providers and the private sector together with the assistance (ie through provision of land) go long way to building community support of affordable housing and showcasing design excellence.</p>
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