

# Ordinary Council Meeting

## Supplementary Business Paper

**Tuesday 9 December 2025**

**ORDINARY COUNCIL MEETING**

Notice is hereby given that an Ordinary Council meeting of Randwick City Council will be held in the Council Chamber, 1st floor Town Hall building, 90 Avoca Street, Randwick on Tuesday, 9 December 2025 at 6pm

**Additional Mayoral Minute**

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Ray Brownlee, PSM  
**GENERAL MANAGER**

## Mayoral Minute No. MM43/25

### Subject: Honouring the Life, Service and Passing of Margaret Martin

#### **Motion:**

That Council:

- a) note the death of Margaret Martin, aged 94, who served Randwick City with distinction as a councillor for 17 years and as Randwick City's first female mayor.
- b) extend heartfelt condolences to Margaret's family and loved ones, including her daughter and our colleague, Councillor Carolyn Martin.
- c) observe a minute's silence in honour of Margaret's life and service.

#### **Background:**

Margaret Martin described herself as an "accidental candidate," motivated simply by a desire to help her community. Born Catherine Margaret Armstrong, she moved from Eastlakes to South Maroubra in 1973 with her husband John and their three children – Jordi, Carolyn, Ian. Together, they ran the family furniture business on Albion Street while raising their family.

Margaret became involved with the Maroubra branch of the Liberal Party in the mid-1970s. After reluctantly agreeing to be listed second on the Liberal ballot for local government pre-selection, she was surprised to win—and was elected to represent the South Ward in 1983, a traditionally strong Labor area. She was re-elected in 1987, 1991, and 1995, later representing North Ward after the family moved to Clovelly.

Margaret's early achievements included advocating for the old Randwick Women's Bowling Club site in South Maroubra to become a retirement village and championing upgrades to Malabar Beach, including improvements in water quality—one of her proudest accomplishments. She also pushed to replace the historical 'alderman' with the gender-neutral 'councillor', a change enacted statewide by the *Local Government Act 1993*.

In 1992, Margaret was elected Mayor, marking a significant milestone in Randwick's civic history as the first woman to hold the position. She served two terms, elected first in 1992 and again in 1996.

As Mayor, Margaret pioneered community initiatives that remain highlights of Randwick City's calendar. She introduced Carols by Candlelight, which began modestly on Kynaston Avenue with fewer than 50 attendees and has grown into the beloved Coogee Carols, attracting thousands to Goldstein Reserve each year. She also established the Randwick Business Awards and Sports Awards, programs that continue to celebrate local achievement.

Margaret oversaw the development of the Coogee Beach foreshore, proudly opening the now-iconic promenade in 1993. She supported early refurbishments at the Des Renford Leisure Centre and was an early advocate for light rail to Randwick – visionary thinking well ahead of its time.

She was the driving force behind the enduring sister city relationship with Temora Shire Council, a relationship that remains strong today.

In 2012, Council renamed the Randwick Branch Library as the Margaret Martin Library in recognition of her pioneering role and outstanding contribution. At the renaming event, then Mayor, Councillor Scott Nash said:

*"The Margaret Martin Library honours a great woman and a true pioneer who dedicated her working life to serving the community. I cannot think of a more appropriate role model for young women in our community to aspire to than Margaret Martin."*

Margaret responded to the honour with her characteristic humility, writing to Councillor Nash (letter dated 12 March 2012):

*“Never in my wildest dreams did I consider that such an honour would be bestowed on me. When I look back on my years at Council...I see it as a unique and fulfilling experience...for which I will always be intensely grateful.”*

At a time when women were significantly underrepresented in local government, Margaret's election as Mayor was groundbreaking. Her leadership has inspired many, including her daughter, Councillor Carolyn Martin, who continues her mother's legacy in this chamber today after being elected councillor for East Ward in 2024.

Margaret was committed to local government being the place “where you can really make a difference—it's about listening and acting for the people who live here.”

She will be remembered as a loving mother and wife, and as a trailblazer for women politicians. At Randwick Council, Margaret will also be remembered for her warmth, humour, humility, and collaborative spirit – qualities that earned trust across party lines and helped foster an effective council that delivered for Randwick locals.

Margaret died on the morning of Thursday 4 December, two days after her 94<sup>th</sup> birthday. She is survived by her children Jordi, Carolyn and Ian, her grandchildren and great-grandchildren.

Council extends its deepest sympathies to Margaret's family, friends, and all who were touched by her remarkable life and work.

The Margaret Martin Library will close on Thursday 11 December from 11:30am to 3:30pm for an event celebrating Margaret's life.

**Attachment/s:**

Nil

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**Submitted by:** The Mayor, Cr Dylan Parker

**File Reference:** F2025/06574

## Director City Planning Report No. CP46/25

### Subject: Affordable Housing Strategy - Post Exhibition Report

#### Executive Summary

- This report outlines the results of community consultation for the draft Affordable Rental Housing Strategy and draft Affordable Housing Design Guidelines.
- The draft Strategy was endorsed by Council (Gordon/Magner) at the 17 June 2025 Ordinary Council meeting for public exhibition.
- The Draft Strategy and associated guidelines were placed on public exhibition for 28 days from 06 August to 03 September 2025.
- Feedback received was generally supportive of the Strategy. A total of 28 submissions were received. 20 submissions fully supported the draft Strategy, 4 supported the Strategy with changes and 2 community submissions expressed opposition to the Strategy's overall objectives. A further 2 submissions were neutral and made general comments about the Strategy.
- Amendments have been made to the strategy to incorporate feedback received from the submissions and to incorporate the findings of the "Options for essential worker housing in New South Wales" Inquiry. An outline of the amendments to the Strategy is provided in Table 4 within this report.
- The most notable changes to the Draft Strategy include:
  - the removal of a 10% target for sites subject to uplift, replaced with an action that proposes the delivery of affordable housing based on maximum development feasibility
  - review of Councils preference for 'in-kind' contributions over monetary contributions to allow flexibility on a case by case
  - a new action to advocate to the NSW Government to address the impact of vacant homes including Short Term Rental Accommodation (STRA).
- At the 28 October Council meeting it was resolved:
  - (Magner/Gordon) that consideration of the Affordable Rental Housing Strategy and Design Guidelines (CP27/25) be deferred to allow for a briefing session on the implications with the matter to return to Council at the December 2025 meeting.
  - the Councillor Briefing session in relation to this matter was held on Tuesday 11 November 2025.

#### Recommendation

That Council:

- a) notes the feedback received from the public exhibition of the Affordable Rental Housing Strategy and the Affordable Housing Design Guidelines and amendments to these documents informed by community and stakeholder feedback; and
- b) adopts the Affordable Rental Housing Strategy and the Affordable Housing Design Guidelines, as amended.

CP46/25

**Attachment/s:**

1.  Affordable Rental Housing Strategy with mark ups
2.  Affordable Housing Guidelines
3.  Summary of key stakeholder submissions and responses
4.  Summary and response to community submissions

## Purpose

This report provides a summary of the public consultation activities carried out during public exhibition of the draft Affordable Rental Housing Strategy and draft Affordable Housing Design Guideline and the results of these activities.

The report also details amendments to the documents as a result of feedback received and seeks adoption of the updated Strategy and Guideline.

## Discussion

### Background and Context

The 2021 Census shows that 3,355 households (6.5%) in Randwick LGA faced unmet need for affordable rental housing. The data indicates that family households are most affected. Demand is expected to rise further with growth in health, education, and research jobs. Over the past 5 years Sydney rents have risen approximately 4 times faster than incomes (SGS Economics and Planning, 2025). Limited supply, coupled with high rents and property prices in Greater Sydney, has worsened affordability in the Randwick LGA, driving residents—especially families and first home buyers—to relocate to more affordable areas such as Bayside, Sutherland, and the Central Coast. Expanding affordable rental housing in the LGA is vital for retaining workers, sustaining community connections, and supporting local productivity.

Building on Council's past achievements, that have positioned Randwick as a leader in the affordable housing initiatives, the draft Affordable Rental Housing Strategy (Attachment 1) presents a comprehensive and balanced response to the current and emerging affordable housing challenges facing Randwick City. This comprehensive framework, informed by research and strategic analysis, outlines clear priorities and practical actions to improve access to affordable housing locally. It also recognises that meaningful progress requires coordinated policy, financial investment, and regulatory support from all levels of government.

At the 17 June Ordinary Council Meeting, Council resolved to endorse the draft Affordable Rental Housing Strategy and the draft Affordable Housing Design Guideline for public exhibition and community consultation as follows:

**“RESOLUTION: (Gordon/Magner) that Council:**

- (a) endorse the draft Affordable Rental Housing Strategy and the draft Affordable Housing Design Guideline for public exhibition and community consultation.
- (b) requests staff prepare and present an annual progress report to Council on the implementation of the Affordable Rental Housing Strategy, including: a. progress against key performance indicators and targets established in the Strategy; b. number of affordable housing units delivered through Council programs and initiatives; c. affordable housing contributions collected and allocated; d. partnerships established with housing providers, developers, and other stakeholders; e. challenges encountered in implementation and proposed solutions; f. emerging opportunities for affordable housing delivery; g. updates on relevant State and Federal policy changes affecting affordable housing delivery; and h. recommendations for strategy refinements or additional actions required to meet affordable housing objectives;
- (c) requests the first annual progress report be presented to Council within 12 months of the Strategy's adoption.
- (d) amend the attached Draft Affordable Rental Housing Strategy as follows:
  - 1.5 Action (p.32) ...such as secondary dwelling and self-contained bedrooms, providing housing choice
  - 2.2 Action (p 34) ...Community Housing providers, Housing Co-ops or other organisation; and,
- (e) request that the findings and recommendations of the report – ‘Options for essential worker housing in New South Wales - June 2025’ be considered and key outcomes and actions relevant to Council are incorporated into the draft Affordable Housing Strategy (post exhibition) and the next review of the Local Housing Strategy.”

The draft Strategy incorporating amendments specifies in item d) of the resolution was placed on public exhibition for 28 days (from 06 August until 03 September).

**Community Consultation**

In line with Council's Community Engagement Strategy, the draft Affordable Rental Housing Strategy and the draft Affordable Housing Design Guidelines were placed on public exhibition for a period of 28 days. The public exhibition took place from 06 August 2025 until 03 September 2025 and included a range of engagement activities and meetings with key stakeholders. Engagement included:

- Councils Your Say Page – submissions and “ask a question”
- Emails to Your Say subscribers
- Email to Key Stakeholders
- Hard copies at Councils Libraries, Customer Service Centres and the Lexington Hub
- Briefing at Randwick Precinct Committee
- Meetings/discussions with:
  - Bridge Housing and:
  - Urban Taskforce
  - Shelter NSW – CEO

Council's Your Say Randwick website hosted the following information:

- [The Draft Affordable Rental Strategy](#)
- [The Draft Affordable Housing Design Guidelines](#)
- [Priorities and Associated Actions](#) taken from the strategy
- A comprehensive list of [Frequently Asked Questions](#) based on the key components of the draft

The community was encouraged to “make a submission” or “ask a question” either directly through the website or via email.

#### Overview of Feedback

A total of 28 written submissions were received from the community and stakeholders. 20 submissions fully supported the draft Strategy, 4 supported the Strategy with changes and 2 community submissions expressed opposition to the Strategy's overall objectives. A further 2 submissions neutral and made general comments about the Strategy.

Seven (7) questions were also submitted using the “ask a question function” on the YourSay website.

The reach achieved through the website was significant with:

- 791 visits to the **Your Say page**
- 191 Downloads/views of the **Draft Affordable Rental Housing Strategy**
- 78 Downloads/views of **Housing Design Guidelines**
- 102 downloads/views of the **FAQs**

#### **Ask a question summary**

A summary of the feedback received from the “ask a question” feature is shown in Table 1 below.

No.	Concerns & Questions	Response
1.	Will affordable housing cost ratepayers?	Funding sources for affordable housing are from developer contributions. State and federal government funding may be available for any future development by Council.

No.	Concerns & Questions	Response
2.	Is affordable housing for Australian Citizens only?	Typically, yes, but this can be reviewed on a case by case for essential workers.
3.	Luxury units dedicated and only for a period of 15 years.	Noted. Council will continue advocating for changes to the State planning system.
4.	An increase in affordable rental properties and boarding houses is necessary. Impacts of short-term rental accommodation and vacant homes should also be addressed.	The strategy will seek to retain and increase the supply of affordable and low-cost housing whilst advocating for improved outcomes in relation to boarding houses and other low-cost housing as well as impacts from short term rental accommodation.
5.	Minimum lot size and frontages are too small and not in line with other cities like Amsterdam.	The Housing SEPP overrides Council's controls, including a minimum lot size of 450m <sup>2</sup> and a minimum lot width of 12m. The strategy is focused on affordable rental accommodation. It commits to both a review of Councils relevant controls and further advocacy to the state government for improvements to the planning system
6.	A lack of affordable and quality options for students.	The strategy acknowledges high rentals for purpose-built student accommodation in the area. Action 3.5 outlines advocacy to the state government for changes to state legislation that specifically address the affordability of Co-Living Developments, specifically student housing.
7.	Informative strategy but seeks clarification on two points: how is the 7.5% target measures? Does it include both affordable housing that is capped at 30% of household income as well as affordable housing that exceeds 30% of income. What is Council's commitment to prioritise low-income households and transitional housing over moderate-income households.	The affordable housing target of 7.5% is inclusive of both forms of affordable and social housing. In relation to eligibility, applicants must meet a range of criteria to qualify for affordable housing including rental stress, risk of homelessness, income thresholds and asset limits. Council's strategy commits to advocating that all affordable rentals should be capped at 30% of household income.

**Table 1:** Summary of the feedback received from the “ask a question” feature in the Your Say Randwick webpage.

### Community submissions summary

Overall, the community was largely supportive of the strategy with key concerns relating to the impacts of short-term rental properties and the impacts of vacant homes/land banking. Two responses indicated:

- anti-sentiment towards social and affordable housing provision including concerns about anti-social behavior and that housing provision is “not a core Council function”. The responses indicate misconceptions about people residing in affordable and social housing

suggesting further efforts to address public perception of social affordable housing may be required alongside Council's ongoing housing program.

A summary of key themes from the submissions is provided below in Table 2 below with a more comprehensive summary and Council's response provided in Attachment 4.

**CP46/25**

Key Themes arising in community submissions	No of times key theme was raised in submissions
General Support/comments	3
Further requirements/costs to developers may hinder development and raise housing costs	1
Longer affordable housing tenancies	1
Concerns with the loss of community facilities and services with redevelopment of Council land	1
Support a review of STRA Accommodation impacts and other actions to reduce impacts	3
Concerns increased densities and population will have impacts on local infrastructure and services – pro-affordable housing in the mix of existing dwellings	1
Concerns about tenants	1
Support for essential worker housing	2
Not a core Council function – to be decided by market or state government	1
To further consider key sites owned by government agencies and others	1
Improved data on empty RFBs	1
NSW Government to impose penalties on vacant properties	3
The strategy should include public housing not just social	1
The target is not measurable if the definition of affordable housing is clear	1
Target to be stated at front of document	1
Focus on lower incomes and transitional housing for Council led affordable housing as moderate can be captured by developer led	1
New residential towers should prioritise long term residents over premium product student housing	1
Concerns of excessive rents being unable to be met by elderly residents – resulting in working well above retirement age	1

**Table 2:** A summary of key themes raised in submissions

#### **Key Stakeholders Consultation**

Consultation was undertaken with the following key stakeholders including government agencies, public authorities and Community Housing Providers (CHP):

- Nightingale
- Women's Housing Company
- UNSW
- Community Housing Limited
- Shelter NSW
- St George Community Housing
- The Deli Women & Children's Centre
- The Department of Planning
- Homes NSW
- Aboriginal Housing Office
- Bayside Council
- Waverley Council
- Woollahra Council
- City of Sydney Council
- Inner West Council

Key stakeholder submissions summary

Key stakeholders raised the following points:

**1. Bridge Housing**

Supports rent setting at 30% of household income and the target of 1,494 new affordable dwellings. Prefers monetary contributions over in-kind dedication for financial sustainability and program flexibility.

**2. The Junction Neighbourhood Centre**

Endorses income-based rent and housing diversity. Requests clearer essential worker definitions and stronger support for vulnerable women escaping domestic violence.

**3. South Sydney Regional Organisation of Councils**

Advocates for a unified affordable housing scheme with broad contributions and a distribution plan. Emphasises partnerships, use of Council-owned sites, and advocacy for legislative changes.

**4. Shelter NSW**

Supports inclusionary zoning and perpetual affordable housing but highlights concerns of essential workers leaving due to affordability. Urges advocacy for rent caps across all providers and policy reforms over campaigns like renting spare rooms.

**5. Dexus**

Questions feasibility of a 10% contribution and seeks economic testing. Prefers monetary contributions, CPI-indexed cash rates, and flexibility in dwelling distribution.

**6. Homes NSW**

Backs 10% GFA targets and LGA-wide contributions but requests updated references and clarity on rent caps. Highlights the role of CHPs and suggests leveraging partnerships for delivery.

**7. Nightingale Housing**

Supports inclusionary zoning as a priority and suggests incentives for renting under-utilized bedrooms. Recommends exploring ground lease models with not-for-profit developers.

**8. Women's Housing Company**

Notes severe housing stress across income levels and affordability gaps even with capped rents. Identifies barriers in tenant placement due to advertising restrictions for CHPs.

### 9. The Deli Women and Children's Centre

Stresses the link between domestic violence and homelessness, calling for more transitional housing. Advocates trauma-informed design, simplified processes, and Domestic Family Violence-inclusive policies.

### 10. CHIA NSW

Commends the strategy but urges higher targets and income-based eligibility for essential workers. Recommends monetary contributions, inclusionary zoning for commercial projects, and planning incentives.

### 11. Urban Taskforce Australia

Argues levies act as a “tax on development” and prefers incentives over contributions. Warns that rigid targets could harm feasibility and housing supply.

### 12. St George Community Housing

Supports inclusionary zoning and partnerships but suggests a 15–20% target on uplift. Raises concerns about STRA impacts and calls for feasibility-based contributions.

### 13. City of Sydney

Strongly supports targets and rent caps at 30% of income. Suggests land transfers to CHPs with legal safeguards and stresses financial sustainability when acquiring stock.

#### Overview of all key stakeholder comments

Overall feedback from key stakeholders was largely positive with support for implementing inclusionary zoning targets on sites subject to uplift, as well as a broader affordable housing contribution. Some stakeholders including Community Housing Providers suggested increasing the inclusionary zoning target beyond the 10% proposed in the strategy. In contrast, those representing the private development industry expressed concerns about the feasibility of a 10% target noting that it would place financial burden on private developers. Many stakeholders across the board highlighted the importance of robust feasibility assessment to inform the introduction of any future levies.

There was also strong support for Council's target of 7.5% of all dwellings to be social and affordable by 2036, however there was concerns from the development industry about how this would be met. There was strong support for essential worker housing and many supported rents being capped at 30% of household income. There was also strong support for partnerships with CHPs to deliver affordable housing programs, due to their capability to access funding streams. Developers and CHPs indicated a preference for monetary contributions over in-kind affordable housing dedications as this can lead to improved affordable housing outcomes.

Key theme from key stakeholder submissions	Number of times key theme was raised in submissions
Support for Inclusionary Zoning target	7
Support exploring a LGA wide affordable housing contribution scheme	6
Support for capping rent of affordable housing at 30% of household income	5
Advocate for state changes to cap all affordable housing at 30% of income	2
Monetary contributions over in-kind dedications	3

Key theme from key stakeholder submissions	Number of times key theme was raised in submissions
Consideration for the geographic distribution of affordable housing across the LGA and the challenges/complexities of managing units scattered across developments and the LGA	3
Supportive of a 7.5% target for social and affordable dwellings by 2036	7
Adopt a higher target	2
Supportive of the number of affordable and social dwellings to be delivered by 2036	2
Concerns that the NSW Government may not meet their targets of social and affordable dwellings	1
Concerns that affordable housing for a period of 15 years will lead to large scale inequality in the future	1
Suggestion for a unified LGA wide affordable housing plan (rather than precinct based)	1
Campaign for spare bedrooms not likely to be successful	2
Increase affordable housing contributions over time	3
Impacts of short-term rental accommodation	4
Support for the delivery of affordable housing on Council land	4
Support of partnerships with CHPs for Council's affordable housing programs	7
Explore affordable co-living developments – with housing Co-ops	3
Collaboration with Homes NSW and CHPs for programs	3
Retention of existing levels of affordable and social housing	3
Retention of existing low-cost rental housing	4
Support for wider tax reform to address housing affordability and barriers for downsizers	3
Prioritise transitional and crisis housing with minimum allocations	3
Incorporate Safety-by-design principles for Council led housing	1

Key theme from key stakeholder submissions	Number of times key theme was raised in submissions
Ensure well located affordable housing	1
Embed domestic Violence services and experts into management of transitional units	1
Provide accessible units	1
Support for essential worker housing	6
Vulnerable people to be prioritised in the allocation of affordable housing	1
Applying affordable housing contribution to commercial development – employment generates housing demand	1
Review of impacts of purpose-built student accommodation	3
Planning concessions for affordable housing – design standards, parking rates and land use permissibility	1
Engage with CHPs for the design of units – design guidelines and development applications	3
Flexible dwelling mix to suit need	3
Address community perceptions of social and affordable housing	1
Key performance indicators to be implemented for delivery	1
Concerns around viability of a 10% affordable housing contribution	2
Encourage renting out of space bedrooms	2
Encourage secondary dwellings	4
Improved reporting data	2
Further clarification for developers	1

**Table 3:** Summary of key themes raised by key stakeholder

**Detailed Responses were received from 13 key stakeholders:**

- Bridge Housing
- The Junction Neighborhood Centre
- South Sydney Regional Organisation of Councils
- Shelter NSW
- Dexus
- Homes NSW
- Nightingale Housing
- The Women's Housing Company
- The Deli Women and Children's Centre

- Community Housing Industry Association NSW (CHIA NSW)
- Urban Taskforce Australia
- St George Community Housing
- City of Sydney

Responses to these submissions are provided in Attachment 3.

### Changes to endorsed Strategy

The following Table 4 summarises the changes to the draft Strategy in response to submissions.

Pg.no	Endorsed Strategy as Exhibited	Amended Strategy (Post Exhibition)
1, 15, 22, 25, 26	Homes NSW administrative Corrections: -The endorsed strategy refers to Homes NSW, Aboriginal Housing Office, NSW Land and Housing Corporation as separate organisations and entities. - The endorsed strategy incorrectly references state and federal funding under section 6.1.	All references in the Strategy to organisations that all fall under the umbrella organisation of Homes NSW has been amended throughout the strategy as requested by Homes NSW.
5	Overall target not indicated in the Executive Summary.	"The strategy also contains an overall target for 7.5% of all dwellings in Randwick City to be social and/or affordable housing by 2036." Added to Executive Summary.
7	"What is affordable rental housing?" references to rent capping based on 74.9% of market rent and 30% of household income.	Amended to reflect changes from Homes NSW submission around rent capping.
8	Table 1. Household Income eligibility limits.	Updated to reflect 2025/26 rates within the 2024 to 2025 Ministerial Guidelines.
14	Clarification of data used in Strategy - Affordable Housing unmet need	This section has been amended to remove reference to 'social housing' as requested by Homes NSW. The data refers to affordable housing need only (separate to social housing).
31, 40	1.1 Action – For sites subject to uplift, require a strategic target of up to 10% of the total floor area to be provided as affordable housing subject to feasibility (inclusionary zoning mechanism).	<p>Reword <b>1.1 Action</b> that for sites subject to uplift, require an affordable housing contribution on the total proposed residential floor space. All affordable housing rates are to be determined by a robust feasibility assessment as part of any future planning proposal (inclusionary zoning mechanism).</p> <p>The specification of a 10% target has been removed from the action and the explanatory paragraph. The action has been amended on the basis that Council seeks to maximise the provision of</p>

Pg.no	Endorsed Strategy as Exhibited	Amended Strategy (Post Exhibition)
		affordable housing based on the level of uplift and feasibility assessment.
32, 40	1.2 Action - For all new development, investigate an LGA wide affordable housing contribution scheme.	No change to action required. This action does not apply to Community Housing Providers. A note has been included in the explanatory paragraph above the action in the Strategy.
32, 41	1.3 Action- Ensure both dwelling dedications and Council led developments of affordable housing meet Council's Affordable Housing Design Guidelines.	<p><b>1.3 Action</b> - Ensure both dwelling dedications and Council led developments of affordable housing consider Council's Affordable Housing Design Guidelines.</p> <p>As the needs of each community housing provider and tenants vary it is important to allow flexibility in the design of affordable housing units. The guidelines provide industry guidance on Council's requirements for amenity, functionality, security and design.</p> <p>The Guidelines have been amended to allow development assessment officers to apply flexibility when considering specific design requirements, including security needs to allow dwellings to be used as transitional housing.</p>
33	1.6 Action - Investigate the impacts of short-term rentals across the LGA and the loss of traditional low-cost and affordable dwellings through the redevelopment of sites to understand the impacts on housing affordability	<p><b>1.6 Action</b> – Investigate the impacts of short-term rentals across the LGA and the loss of traditional low-cost and affordable dwellings through the redevelopment of sites to understand the impacts on housing affordability and any impacts on essential worker housing provision.</p> <p>Amended to included essential worker housing impacts</p>
33, 42	1.8 Action - Investigate and implement planning incentives and mechanisms to encourage residential apartments in areas where there is competition for residential floor space.	Included in implementation plan to be consistent with draft strategy.
34,42	New Action 1.9 – this is a new action that was not in the endorsed strategy. 1.9 Action – Investigate Council's approach to levying affordable housing contributions to	<b>1.9 Action</b> – Investigate Council's approach to levying affordable housing contributions to allow for monetary contributions in lieu of in-kind dedication.

Pg.no	Endorsed Strategy as Exhibited	Amended Strategy (Post Exhibition)
	<p>allow for monetary contributions in lieu of in-kind dedication.</p> <p>A new action based on the feedback received from across the industry both community housing providers and developers in relation to the inefficiencies of 'in-kind' affordable housing contributions.</p> <p>Explanatory paragraph also included above action in the strategy and is added to implementation plan.</p>	<p>A new action based on the feedback received from across the industry both community housing providers and developers in relation to the inefficiencies of 'in-kind' affordable housing contributions.</p> <p>Explanatory paragraph also included above action in the strategy and is added to implementation plan.</p>
43	<p>2.1 Action- For the development of Council owned land, develop a priority list of sites and undertake land use analysis and feasibility assessment to investigate opportunities for the delivery of affordable rental housing.</p> <p>Timeframe: 6 months</p>	<p>2.1 Action For the development of Council owned land, develop a priority list of sites and undertake land use analysis and feasibility assessment to investigate opportunities for the delivery of affordable rental housing</p> <p>Timeframe updated to 9-12 months to provide sufficient time for detailed feasibility and land use analysis</p>
43	<p>2.2 Action – Explore joint venture opportunities or partnerships with Community Housing Providers, Housing, Co-ops or other organisations for delivering affordable housing on Council owned land</p> <p>Timeframe: 6 months</p>	<p>2.2 Action– Explore joint venture opportunities or partnerships with Community Housing Providers, Housing, Co-ops or other organisations for delivering affordable housing on Council owned land</p> <p>Timeframe updated to 12 months to provide sufficient time for Action 2.1 to be completed</p>
37, 44	<p>3.3 Action - Advocate for affordable essential/key worker housing to be delivered as essential infrastructure required to support large scale non-residential redevelopment on government land or in proximity to proposed new infrastructure.</p>	<p><b>Action 3.3</b> Advocate for essential/key worker housing that is affordable to be delivered as essential infrastructure required to support large scale non-residential redevelopment on government land or in proximity to transport infrastructure.</p> <p>This amendment provides further clarity of the intent of the action and to consider proximity to transport infrastructure as part of the criteria.</p>
38, 45	<p>3.5 Action – Advocate to the NSW Government to address the affordability of Co-Living developments through the planning system.</p> <p>Timeframe: 6 months</p>	<p><b>3.5 Action</b> Advocate to the NSW Government to require affordable dwellings within all Co-Living developments through the planning system to provide for students and essential workers.</p> <p>Timeframe updated from 6 months to 9 months.</p>

Pg.no	Endorsed Strategy as Exhibited	Amended Strategy (Post Exhibition)
38, 45	<p>New Action 3.6 – is a new action that was not in the endorsed strategy.</p> <p>3.6 Action – Use existing statistics of vacant homes and sites to advocate to the NSW Government for a levy or other possible mechanisms to address homes being left vacant for more than 12 months or for the most part of 12 months with revenue provided towards Council's affordable housing programs.</p> <p>This has been added in response to feedback and key concerns raised during the public exhibition and responding to Council resolution MM34/24 (23 July 2024 Ordinary Council Meeting) that seeks to address vacant homes and land banking through the introduction of a levy for homes vacant more than 12 months.</p>	<p><b>3.6 Action</b> – Use existing statistics of vacant homes and sites to advocate to the NSW Government for a levy or other possible mechanisms to address homes being left vacant for more than 12 months or for the most part of 12 months with revenue provided towards Council's affordable housing programs.</p> <p>This has been added in response to feedback and key concerns raised during the public exhibition and responding to Council resolution MM34/24 (23 July 2024 Ordinary Council Meeting) that seeks to address vacant homes and land banking through the introduction of a levy for homes vacant more than 12 months.</p>
39, 46	<p>New Action 3.7 – is a new action that was not in the endorsed strategy.</p> <p><b>3.7 Action</b> – Advocate to the NSW Government for the Ministerial Guidelines to be updated to require all affordable housing to be capped at 30% of household income or 74.9-80% of market rent whichever is lesser for the individual household.</p> <p>Amended based on feedback received from Homes NSW and other stakeholders/community members during the public exhibition. This would address issue of rents being unaffordable and exceeding 30% of household income.</p> <p>This is also consistent with recommendation 6 of the NSW Parliamentary Inquiry (see below).</p>	<p><b>3.7 Action</b> – Advocate to the NSW Government for the Ministerial Guidelines to be updated to require all affordable housing to be capped at 30% of household income or 74.9-80% of market rent whichever is lesser for the individual household.</p> <p>Amended based on feedback received from Homes NSW and other stakeholders/community members during the public exhibition. This would address issue of rents being unaffordable and exceeding 30% of household income.</p> <p>This is also consistent with recommendation 6 of the NSW Parliamentary Inquiry (see below).</p>

**Table 4:** Outline of changes between endorsed strategy and final version of strategy

### Changes to Affordable Housing Design Guidelines

The Draft Affordable Housing Guidelines assist developers and Council in the assessment of dwellings to be dedicated to Council as affordable housing. Specifically, it contains design requirements for amenity, dwelling size, dwelling mix, accessibility and fit out. They also provide a checklist to be used at the time of DA assessment.

Following public exhibition, the Draft Affordable Housing Design Guidelines has been updated to enhance resident safety and to support the potential use of dedicated units as transitional housing. The amendments also address Council resolution CC23/25 from the Ordinary Council meeting of 26 August 2025 in which Council resolved to increase transitional housing. The resolution as follows:

**RESOLUTION: (Veitch/Willington) that:**

- (a) *Council notes the current and planned efforts to facilitate the increased resourcing for local housing and support services that support victim-survivors of family and domestic violence;*
- (b) *increase the community partnerships budget by \$100K in the 2026/27 budget;*
- (c) *allocate a minimum of five additional FDV transitional homes by 2028; and*
- (d) *receive a report in financial year 2028/29 to add further additional FDV transitional homes in council's new affordable housing properties.*

In line with the Council resolution, the Guidelines have been amended to specifically address:

- Crime prevention through environmental design (CPTED) principles
- Secure entry points for individual units
- Building access control – to encourage electronic access systems
- Floor-level security – restricted and secure lift access
- Surveillance – CCTV and Passive surveillance

The guidelines require compliance with relevant parts of Section C2 of the Draft DCP that deal with security and safety matters. The guidelines also reiterate the need for proposals to detail these measures in development applications for in-kind affordable housing dedication.

### **Response to Parliamentary Inquiry – Essential Worker Housing**

Council officers have reviewed the recommendations handed down in June 2025 by the Parliamentary Inquiry considering relevance to Randwick City. The recommendations included implementing a coordinated, statewide approach led by Homes NSW to address the housing challenges faced by essential workers—those who earn too much for social housing but not enough for market rates. Key proposals included establishing an independent accountability board, integrating essential worker housing into planning and zoning policies, prioritising government land for development, and exploring innovative models like build-to-rent and shared equity schemes. The inquiry emphasised the need for flexible definitions, localised solutions, and better use of existing housing stock to ensure essential workers can live near their workplaces.

The following recommendation are relevant:

- *Recommendation 6 – the eligibility for essential worker housing should be determined based on a clear criterion, such as market rent exceeding 30% of an essential workers income with rents set as a percentage of income rather than a discount on market rent*

#### **Response:**

Action 3.7 has been added to seek a cap of 30% of household income as a basis for all affordable housing

Action 4.1 seeks to cap Council-owned affordable housing rents at 30% of household income

- *Recommendation 7 - That the NSW Government mandate all local councils to develop and implement affordable housing strategies that incorporate specific provisions for addressing the housing needs of essential workers within their local government area.*

**Response:** Council's endorsed Strategy will be consistent with this recommendation

- *Recommendation 8 - That the NSW Government, in collaboration with local councils, undertake an audit to develop a comprehensive, publicly available register of affordable housing across the state, with a subset dedicated to essential worker housing*

**Response:** Action 3.2 advocates for improved data and collaboration

## Strategic alignment

The relationship with our 2022-26 Delivery Program is as follows:

Delivering the Outcomes of the Community Strategic Plan:	
Strategy	Housing
Outcome	A city with diverse and affordable housing that responds to local needs
Objective	Increase the percentage of all households that are either social or dedicated affordable housing to a minimum of 10% by 2040.
Delivery program commitment	Continue to identify appropriate areas to apply an affordable housing contributions scheme requiring a proportion of all development to be dedicated as affordable housing.
Delivery program commitment	Develop and implement actions to provide affordable housing across the City, including for key workers.
Delivery program commitment	Work with the Land and Housing Corporation to develop a staged approach for the renewal of social housing estates, ensuring increased social housing dwellings in any redevelopment.
Delivery program commitment	Explore the opportunity to increase Council's 2021 baseline of transitional housing provision for women and children escaping domestic violence.

## Implementation and reporting

The strategy contains an implementation plan, including timeframes and responsibility for delivery of priorities and actions.

In accordance with the June 2025 Council resolution, an annual progress report will be prepared for Council on the implementation of the Affordable Rental Housing Strategy, with the first report to be presented to Council within the first 12 months of the strategy's adoption.

The report will include:

- Existing affordable and social housing provision in the LGA including Council's current affordable dwelling holdings and money in reserves
- the overall progress of the implementation plan and its relevant priorities and actions.
- specific achievements or milestones relevant to the implementation plan or any further affordable housing achievements
- any challenges or significant changes affecting affordable housing delivery and management including those from state government and federal funding; and
- Progress in meeting the 7.5% target of social and affordable dwellings by 2036.

## Risks

To assist in considering the adoption of the report's recommendations, the following potential risks have been identified:

Risk	Mitigation
<b>Legislation considerations</b> Changes in state or federal policies, or delays with regulatory approvals (e.g., planning or zoning changes), could adversely affect the project's timeline and targets.	Maintain monitoring of government policy and regulatory changes. Establish regular communication channels with state and Federal agencies to anticipate policy shifts. Establish a flexible approach to implementation. Whilst the implementation plan has set timeframes, these can be reviewed to align with state/Federal policy changes where

	necessary. Any changes will be reported within each annual report.
<b>Financial Considerations:</b> <ul style="list-style-type: none"><li>Managing and maintaining Council owned affordable housing</li></ul>	This will continue to be subject to regular monitoring and review to achieve a balanced budget
<b>Reputational considerations:</b> <ul style="list-style-type: none"><li>Local residents may oppose affordable housing developments due to concerns about property values, increased traffic, or changes in neighborhood character which can lead to negative publicity.</li></ul>	<p>It is essential that they are addressed to mitigate any reputational risk or heightened community concerns.</p> <p>Council's robust, open and transparent community consultation process that informed the final strategy will provide input into the implementation of Council's affordable housing program, ensuring that they communicate:</p> <ul style="list-style-type: none"><li>• What affordable housing is.</li><li>• Who it is for</li><li>• Any other common misconceptions in relation to affordable housing.</li></ul> <p>Council maintains clear and open communication about affordable housing project goals, progress, and challenges, regularly updating the public and stakeholders to build trust and enhance credibility.</p>
<b>Community Consideration</b> Loss of community diversity and social balance due to insufficient affordable housing provisions	Maintain and expand an affordable housing portfolio in partnership with community housing providers and developers.  Integrate affordable housing targets into planning instruments and redevelopment projects.  Advocate for state and federal support for local housing affordability initiatives including for key workers. Support mixed-tenure developments to promote social cohesion and inclusion.

## Resourcing Strategy implications

The endorsed strategy and design guidelines have been prepared internally by Council's Strategic Planning team as part of the Council 2023-2024 and 2024-2025 budget allocations.

The adopted strategy will be embedded into annual work plans of Strategic Planning Department and where required, associated budget allocations. The anticipated timeframes and responsibilities are outlined in the implementation plan (Section 10 of the Strategy).

## Policy and legislative requirements

Relevant policies and legislation in relation to the review of Council's Affordable Housing Strategy:

- Environmental Planning and Assessment Act 1979
- Environmental Planning and Assessment Regulation 2021
- State Environmental Planning Policy (Housing) 2021 (Housing SEPP)
- Sydney Metropolitan Plan - The Six Cities Vision
- Eastern City District Plan
- Randwick Local Strategic Planning Statement

- Randwick Vision 2040 - Housing Strategy
- Voluntary planning agreements under section 7.4 of the Environmental Planning and Assessment Act (EP&A Act)
- Randwick City Council Affordable Housing Schemes (Kensington and Kingsford Town Centers and the Housing Investigations Areas + Randwick Junction Town Centre under gateway determination).
- NSW Affordable Housing Ministerial Guidelines 2024-25.
- Parliamentary Inquiry 2025- Options for essential worker housing in New South Wales report.

CP46/25

## Conclusion

The Affordable Housing Strategy has been developed based on a comprehensive housing needs analysis and informed by best practice planning approaches. It outlines clear objectives and actions to strengthen Council's ongoing leadership and commitment to delivering affordable housing in Randwick City over the next 10 years.

Following its public exhibition from 6 August to 3 September 2025, the Strategy was subject to a range of engagement activities, including the Your Say Randwick page and meetings with key stakeholders. Feedback received during this period was largely supportive, with strong endorsement from the community and stakeholders for measures such as inclusionary zoning and broader affordable housing contributions. While Community Housing Providers advocated for increasing the proposed 10% inclusionary zoning target, representatives from the private development sector raised concerns about its financial feasibility. Across stakeholder groups, there was consensus on the need for robust feasibility assessments to guide any future levies or contributions.

The Strategy has also addressed key outcomes/actions arising from the Parliamentary Inquiry into Essential Worker Housing in line with the resolution of 17 June Ordinary Council meeting.

In response to submissions and the outcomes of the Parliamentary Inquiry into Essential Worker Housing, several amendments have been made to the draft Strategy. These include replacing the fixed 10% inclusionary zoning target with an action to pursue the maximum feasible rate; reviewing Council's preference for 'in-kind' contributions over monetary contributions on case-by-case basis; and introducing actions to address the impact of vacant homes, including Short Term Rental Accommodation (STRA).

These changes reflect Council's responsiveness to stakeholder input and its commitment to evidence-based policy development. It is therefore recommended that Council endorse the amended Affordable Housing Strategy and associated Design Guideline as final (Attachment 1 and 2).

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**Responsible officer:** Matthew Salamone, Environmental Planning Officer; David Ongkili, Coordinator Strategic Planning

**File Reference:** F2023/00708

Item CP27/25

STRATEGIC PLANNING

# Affordable Rental Housing Strategy ~~DRAFT~~

17 October 2025

CP46/25



1300 722 542  
[randwick.nsw.gov.au](http://randwick.nsw.gov.au)

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**Name of Strategy:** [Draft](#) Randwick Affordable Rental Housing Strategy 2025

**Approval and commencement:** *[insert once approved and commenced]*

**Land to which the strategy applies:** All land within the Randwick City Council Local Government Area (LGA).

Where relevant, this strategy may also apply to land outside the Randwick LGA in the case of a program, property or otherwise where Council has an interest in the provision of affordable housing that deals with land not within the Randwick LGA.

This version of the draft Strategy has been modified in line with the Council resolution of 17<sup>th</sup> June Ordinary Council meeting. In line with Council's resolution and following final adoption, annual progress reports on the implementation of the Strategy will be prepared for Council's consideration.

## 1. Executive summary

Randwick City Council has a strong and long standing commitment to planning, advocating for, and facilitating, the delivery of affordable housing within the local government area (LGA). Council remains dedicated to supporting the growth of both affordable and social housing to meet the needs of the community. In 2008, following research and investigations into the issue of declining housing affordability, Randwick City Council adopted the *“Affordable Housing Strategy and Action Plan 2008”*, being one of only a few councils to have such a plan. Since that time Council has introduced several Affordable Housing Contribution schemes that are delivering affordable rental dwellings and monetary contributions. Council has also continued to advocate and negotiate for increased affordable housing on new major developments with residential components.

Despite the positive changes achieved locally through these efforts, housing affordability has continued to decline nationwide in the years following Council’s Affordable Housing Strategy and is now affecting a larger portion of the community.

This Strategy reflects the vision, directions and actions of the two “Vision 2040” strategic documents endorsed by Council in 2020: the Local Strategic Planning Statement 2020 (LSPS) and the Housing Strategy 2020.

As at the 2021 ABS Census, 6.5% (3,355) of households in Randwick City Council had an unmet need for affordable housing.

With housing costs rising faster than wages growth, households in housing stress often have to make difficult trade-offs including reducing spending on other essential items; working longer hours and/or multiple jobs; relocating to areas further away from places of employment, family or education; relocating to smaller or substandard housing; or sharing with extended family/friends.

This strategy is the cumulation of extensive research and strategic analysis of current and emerging affordable housing issues affecting Randwick City. It outlines a new affordable housing framework for Randwick City, detailing the directions and action plans to address affordable housing at the local level. It recognises the broader need for all levels of government to support and complement these efforts through appropriate policy, financial and regulatory action to address the deepening housing challenges both in the local area and Greater Sydney.

This strategy is primarily focused on affordable rental housing, as rental housing is an immediate need that provides stability and security whilst home ownership is generally a longer term goal for many households.

The following priorities are presented in this strategy:

1. Accelerate the delivery and retention of quality affordable and low-cost housing through the use of planning provisions
2. Provision of affordable rental housing led or supported by Council
3. Collaboration and advocacy with key government organisations for increased provision of affordable housing
4. Review and establish processes for the ongoing management of affordable housing

Each priority contains actions to ensure deliverables are outlined to meet the objectives of the priorities. The strategy also contains and overall target for 7.5% of all dwellings in Randwick City to be social or affordable housing by 2036.

## 2. Purpose and Context

The purpose of the Affordable Housing Strategy is to provide Council with a decision making framework for planning and delivering affordable housing over the next 10 years. It includes a range of priorities and actions based on analysis of supply and demand challenges within the Randwick LGA. It also takes into account the state and federal government initiatives aimed at addressing housing affordability.

The existing Affordable Housing Strategy and Action Plan 2008 has provided Council with a robust and effective plan to implement affordable housing initiatives as outlined in the specific tasks contained in the Action Plan. The new Strategy builds on Council's past achievements as [a leaders in NSW in supporting](#) affordable [in NSW](#) with:

- **Prince Henry Development Control Plan (DCP) 2004** requirement for 1% of all dwellings on site to be provided as affordable housing, through a negotiated outcome between Council and Urban Growth NSW.
- **State Environmental Planning Policy No. 70 – Affordable Housing (Revised Schemes) 2002** one of the first Councils to be included in the state policy for the purposes of affordable housing in 2019.

This new strategy will also address strategic objectives outlined in Councils documents that have been implemented since the adoption of last strategy and action plan. These documents include:

- **Randwick City Council Local Strategic Planning Statement (LPSP) 2020** outlines a 20-year vision for land use planning in the Randwick LGA reflecting the community's aspirations for how Randwick City should grow and evolve, focusing on livability, sustainability, productivity and infrastructure needs. In relation to housing, the LPSP prioritises diversity of housing types, addresses housing supply gaps and supports the delivery of affordable housing.
- **Randwick Housing Strategy 2020** was part of the Vision 2020 community engagement program sets a staged approach to housing growth, focusing growth in and around town and strategic centres and supports planning mechanisms that require developers to contribute to affordable housing, especially in areas where development uplift is proposed.

This strategy also considers the objectives of state government policies including "A Metropolis of Three Cities 2018" that outlines an action to prepare an 'Affordable Rental Housing Target Scheme' and The Eastern City District Plan 2018 that sets the future strategic direction for the Eastern City District with objectives to provide more diverse and affordable housing and prepare a Housing Strategy to inform the Affordable Rental Housing Target Schemes for development precincts.

### 2.1. Existing Affordable Housing Framework

Since 2008 three key documents have set the framework for Affordable Housing provision in Randwick City. These are outlined below along with their respective intents:

#### *Affordable Housing Strategy + Action Plan 2008-2018*

- Affirm Council's support in the provision of affordable housing
- Describes actions Council will implement over 10 years to realise Directions
- Provide reference about current AH issues facing Randwick LGA

*Affordable Rental Housing Program + Procedures 2006*

- Outlines eligibility criteria and assessment for allocation of ARH
- Establishes how Council will manage ARH properties

*Council's Affordable Housing Policy 2018 (originally 2006, but reviewed in 2018)*

- Key policy statement and five key principles as a basis for developing an Affordable Housing Strategy

In addition to the above key documents, Council has developed the *Procedures for staff: Randwick affordable rental housing units - Transfer of ownership to Council*.

This new Strategy sits alongside two simplified, supporting guidelines:

- Randwick Affordable Rental Housing Design Requirements – an attachment to the strategy that outlines design requirements and design expectations for affordable housing delivered by developers, community housing providers and Council and;
- Affordable and Transitional Housing Policy Guidelines – outlines the guidelines for Council owned and leased as affordable housing, including types of affordable housing, the management of affordable housing units, eligibility and the application process. The guidelines are to sit outside of the strategy and made publicly available on Councils website to provide guidance to community, industry stakeholder and Council Staff.

## 2.2. Why is a new strategy required?

A new affordable rental housing strategy for Randwick City needs to reflect the various housing, demographic and policy/legislative changes since the previous strategy was adopted. These changes include:

- Demographic trends and population growth;
- Rising housing costs;
- Introduction of new State Environmental Planning Policies, Sydney Region and District Plans;
- Adoption of Councils Local Strategic Planning Statement, Housing Strategy, Affordable Housing Contribution Plans;
- Employment growth in the Health and Education precinct and;
- Reshaped housing needs as a result COVID-19.

## 3. What is affordable rental housing?

Affordable rental housing is universally recognised as housing that is reasonably priced for households on very low to moderate incomes ([Table 1](#)) and costs no more than 30% of household income and may cater to those employed in lower paid jobs within the health care, childcare, aged care, hospitality and retail industries.

Under t[The NSW Affordable Housing Ministerial Guidelines rent is to be capped at least 20% of market rent, however CHPs typically cap rents at 74.9% of market rent to maintain their charitable status. The Guideline's affordable outcomes seek to ensure that in general, households on very low and low incomes should not pay more than 25 - 30% of their gross income in rent. ensure housing is no more than 30% of household income, NSW Affordable Housing Ministerial Guidelines requires rent to be capped at no more than 74.9% of market rent \(within the local area\). The target groups eligible for affordable rental housing are typically in very](#)

~~low, low and moderate income households (Table 1). This may include those employed in lower paid jobs within the health care, childcare, aged care, hospitality and retail industries.~~

To explain this further, if a typical two-bedroom apartment in Randwick rents for \$800 per week on the private market, ~~if under the NSW Affordable Housing Ministerial Guidelines~~, an equivalent affordable rental property would be capped at no more than 74.9% of this market rate, meaning eligible tenants would pay a maximum of \$599 per week. This reduction can make a significant difference for individuals and families struggling with housing affordability, ensuring they can access secure, well-located housing at a more sustainable cost. By keeping rents below market rates, affordable housing helps lower-income households avoid financial stress while remaining connected to their jobs, schools, and support networks within their local community.

Whilst capping rents at 74.9-~~80~~% may be effective for households on moderate incomes, for those on lower incomes, with Randwick City's high land values, rent may still exceed ~~25~~-30% of household incomes. For example, a single parent earning \$900 per week, market rent would consume nearly 80% of their income, leaving very little for essentials like food, transport, and medical expenses. With affordable housing capped at 74.9% of market rent their rental costs would be reduced to around 58% of their income which whilst a significant reduction would likely impact a household's ability to afford basic necessities and housing and financial security.

It is therefore recognised that capping rents at 30% of household income or 74.9% of market rent (whichever is less for the household) will ensure households can secure housing whilst meeting basic necessities. This is reflected in Council-endorsed, location-specific Affordable Housing Plans<sup>1</sup>. Figure 2 outlines scenarios of households that would be eligible for affordable housing.

**Table 1.** Household income eligibility limits for affordable rental housing in Sydney  
202~~5/263/2024~~

Household structure	Gross annual household income		
	Very low	Low	Moderate
Single adult	\$3 <del>62,0300</del> 00	\$5 <del>71,6700</del> 00	\$8677,4600
Each additional adult (18 years or over)	Add \$1 <del>86,02</del> 00 to the income limit	Add \$2 <del>85,89</del> 00 to the income limit	Add \$4338,2800 to the income limit
Each additional child (under 18 years)	Add \$109,8700	Add \$1 <del>75,35</del> 00	Add \$2 <del>53,93</del> 00

Source: NSW Affordable Housing Ministerial Guidelines [2025/26 Income eligibility limits updated 2023-2024](#)

### 3.1. Housing spectrum and why affordable housing matters?

To understand where affordable housing sits within the overall housing market, it is important to examine the relationship between the types of housing options within the housing spectrum, ranging from homelessness and crisis accommodation, social housing to affordable and private rental housing as well as affordable home ownership. [A term commonly used for government led and owned housing is 'public housing' which refers to either social or affordable housing products delivered on government land and retained and managed by the government.](#)

In particular, as shown in Figure 1, Social Housing and Affordable Rental Housing play an important role in providing stable accommodation for low- and moderate-income households.

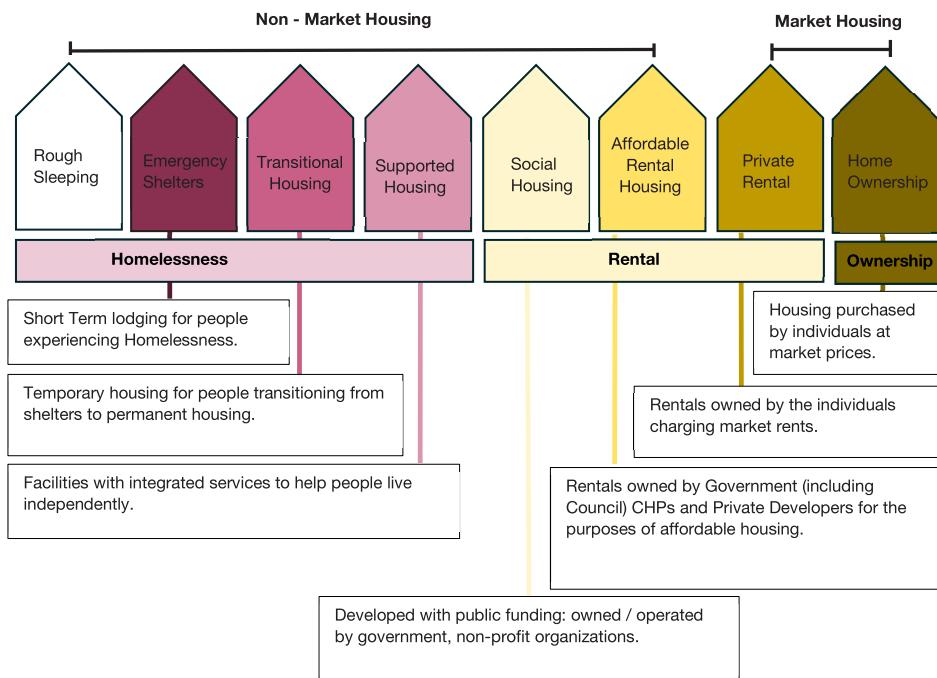
<sup>1</sup> K2K Affordable Housing Plan 2019, HIAs Affordable Housing Plan 2023, prepared by Randwick City Council

Social Housing, often government-subsidised, supports those in severe housing need, while Affordable Rental Housing bridges the gap between market rentals and subsidised housing. These housing solutions contribute to social inclusion, economic stability, and community resilience, ensuring equitable access to safe and secure housing options.

Social housing is typically restricted to households only on ‘very low’ incomes and those on income support, whereas further along the housing spectrum, affordable rental housing, is associated with those employed and on “very low” to “moderate” incomes.

In the past, the issue of housing affordability was often associated with very low-income and low and moderate households and those on income support. However, the current reality is that with reduced housing affordability many households on moderate-incomes and above, irrespective of whether they are looking to rent or purchase a house, find housing to be unaffordable, particularly in inner city areas such as Randwick.

**Figure 1: The housing spectrum**



Source: Adapted from Australian Government, Affordable Housing Working Group: Issues Paper by Department of Treasury 2016

### 3.2. Who is affordable housing for?

The lack of affordable housing for households can result in households having a reduced quality of life due to trade-offs that need to be made such as increased commuting distances, poor quality housing or inability to pay for essential living costs. The following scenarios provide examples of individuals and household types who would qualify for affordable rental housing in Randwick City. The scenarios consider the households composition, income and their connection to the area.

#### Janet (37)

Janet is a teacher at Randwick Public School and is a single parent to two children aged 8 and 10. Janet's current income is \$1,837 a week. She rents a two-bedroom apartment in Randwick which is walking distance to the primary school where her two children attend.

The cost of the apartment at the market rent rate would be \$900 weekly. This would leave her and her two children \$937 per week to pay for essentials and other costs.

Janet would be eligible for affordable housing as she meets the income criteria. Her family is classified as a moderate income family.

#### Vince (29)

Vince is completing a Master Degree at the University of New South Wales. He works part-time as a youth support officer at one of the local youth refuges. He also receives a student assistance payment from the Government. He has a weekly combined income of \$937.

Vince lives in a studio in Kingsford. He likes living there as it is close to the University and also to his work. Without affordable housing the weekly rent would cost Vince \$400. This would leave him with \$537 for other essential costs.

Vince is eligible for affordable housing as he meets the low income criteria.

#### Ben (52)

Ben has a full-time job as a labourer in Matraville. His weekly income is \$1350. Ben enjoys living close to work and his aging parents who live in Little Bay.

Ben rents a studio in Matraville where he pays \$550 a week rent. This leaves him with \$800 to spend on other essential living costs.

Ben qualifies for affordable housing as he classified as earning a moderate income.

#### Lina (71) and Graham (68)

Lina and Graham are pensioners with a combined weekly income of \$789. They have lived in Maroubra for over 30 years and have developed a strong connection to the area. Lina and Graham enjoy living in the area as their children and grandchildren also live in the Randwick Local Government Area. Lina and Graham love spending time in Heffron Park with their family and volunteer at the local library.

Lina and Graham rent a one bedroom apartment in Maroubra for \$530 a week. This leaves them \$259 per week for all remaining expenses.

Lina and Graham are eligible for affordable housing as they are classified as a very low income household.

#### Ian (41) and Elizabeth (40)

Ian and Elizabeth live with their three young children in Closely. The family really enjoys the local area and spends lots of time at Centennial Park, Coogee Beach and visiting other family and friends in the area.

Ian works as a part-time lecturer at the University of New South Wales and has a weekly income of \$1458. Elizabeth works as a nurse at the Sydney Children's Hospital and has a weekly income of \$1770. All three children are in high school.

Without the assistance of affordable housing, the weekly rent for their 3 bedroom apartment would cost \$1600. This leaves them \$1628 for essentials.

Ian and Elizabeth are classified as a moderate income family and satisfy the criteria for affordable housing.

**Figure 2: affordable housing eligibility examples**

## 4. Population, housing profile and need

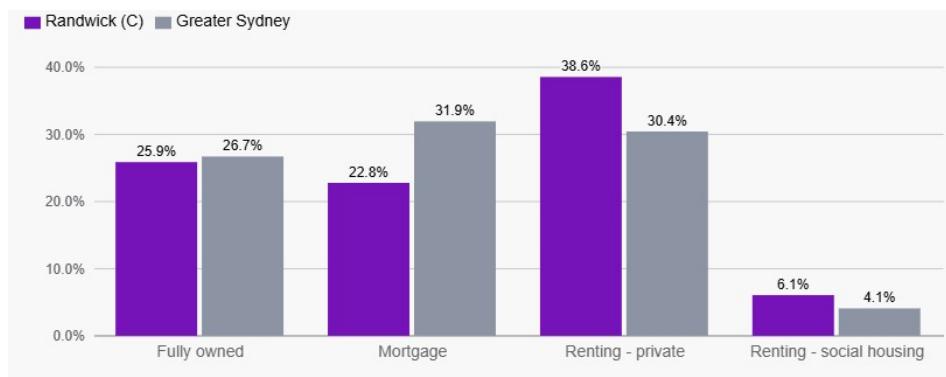
The Randwick LGA covers an area of approximately 37km<sup>2</sup>, extending from Centennial Park in the north to La Perouse in the South. The LGA has high amenity and is a sought-after place to live, with good proximity to the Sydney Central Business District, local employment opportunities and a range of excellent services and facilities. It is estimated that the Randwick LGA currently has a population of 144,598 people.<sup>2</sup> It is expected that the population will increase to 154,745 people by 2041, which represents 7% growth.<sup>3</sup>

**Table 2. Population trends**

	Land area	Population		
		2021	2041	Change
<b>Randwick LGA</b>	36.3	135,219	154,745	19,566

Source: NSW Department of Planning Population Projections, 2024

At the 2021 Census, in the Randwick LGA, 48.7% of households were purchasing or fully owned their home, whilst 38.6% were renting privately, and 6.1% were in social housing (now at 6.8%) in 2024. When benchmarked against Greater Sydney, the LGA has both higher rates of households renting privately and living in social housing with only 30% of households across Greater Sydney in private rental accommodation and 4.1% in social housing.



**Figure 3.** Tenure types in the Randwick LGA benchmarked against the tenure types for Greater Sydney based off the 2021 Census (Source: .id community, Randwick City Council Housing Monitor 2024).

Currently in the Randwick LGA there are over 4,000 social housing dwellings, representing ~~4%~~ almost to 7% of total housing dwellings within the LGA. This is above the 4% average across

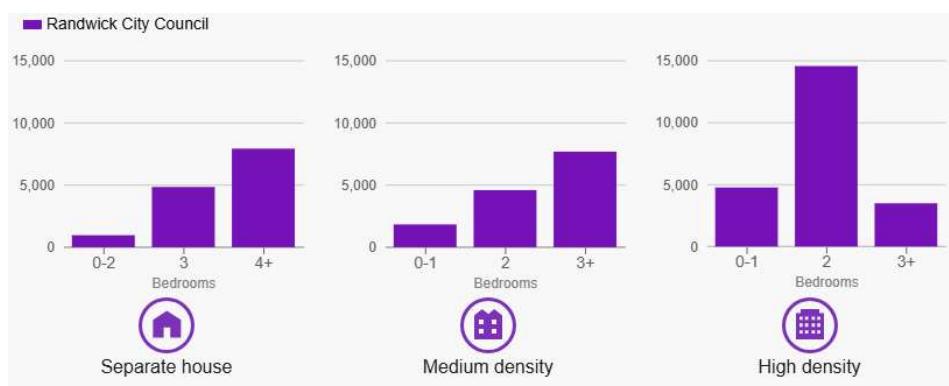
<sup>2</sup> Randwick City Council community profile, .id community - <https://profile.id.com.au/randwick>

<sup>3</sup> NSW Department of Planning Population Projections, 2024 accessed 03 April 2025 <https://www.planning.nsw.gov.au/data-and-insights/population-projections/explore-the-data>

<sup>4</sup> NSW Government Local Area analysis – Randwick <https://www.nsw.gov.au/departments-and-agencies/homes-nsw/social-housing-resources/local-area-analysis-randwick>

NSW<sup>5</sup>. Of these, the majority are owned by [Homes NSW the NSW Land and Housing Corporation and a small percentage owned by the Aboriginal Housing Office \(AHO\)](#) and Community Housing Providers (including St George Community Housing).

As demonstrated in figure 4, the type of housing that Randwick City residents are currently living in is quite diverse with the highest proportion of households living in 2-bedroom apartments in high density developments. The data also highlights there is a large number of households living in separate houses that are 4 bedrooms or greater as well as households in 3 bedrooms or greater attached dwellings and low-rise apartments.

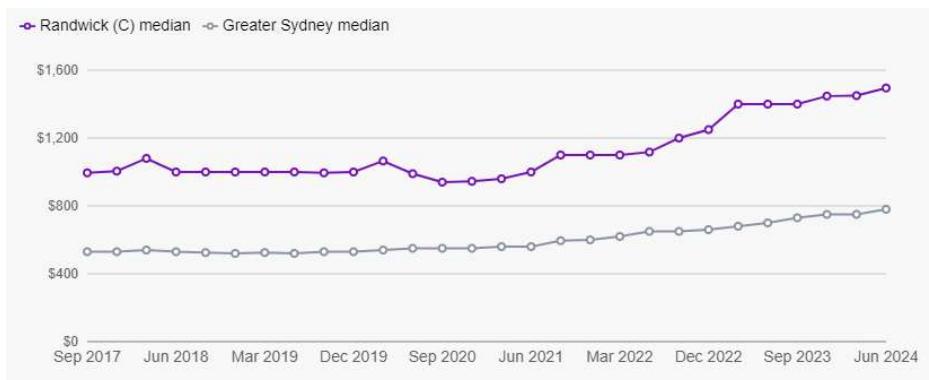


**Figure 4.** Dwelling types of households within in the Randwick LGA, based off the 2021 Census data (Source: [.id community, Randwick City Council Housing Monitor 2024](#)).

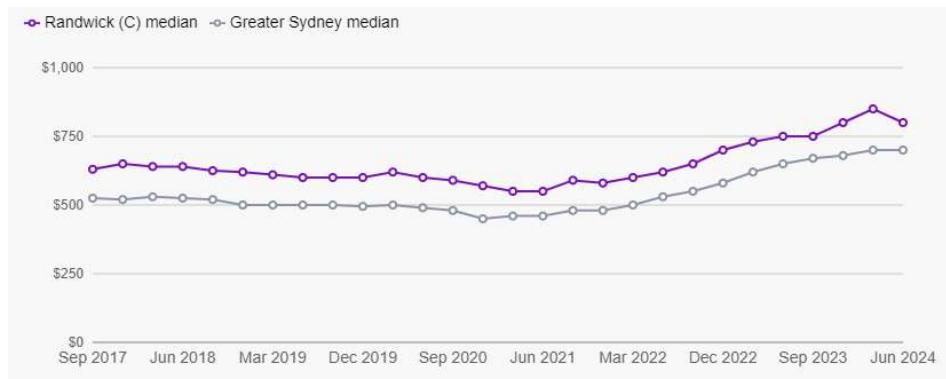
Additionally, the cost of rental housing in the LGA is also significantly higher than for the Greater Sydney, with the median rental for a house being \$1,495 per week compared with \$780 per week in Greater Sydney, and the median cost of rental for a unit being \$800 per week compared to \$700 per week across Greater Sydney. As shown in Figures 5 and 6, there has been a substantial increase in weekly rental prices in the Randwick LGA since 2021. Figure 7 indicates a relatively low vacancy rate that has steadily declined from 2.10% in September 2019 to 1.38% in June 2024<sup>6</sup>.

<sup>5</sup> Bringing affordable housing to scale, Committee for Sydney December 2022

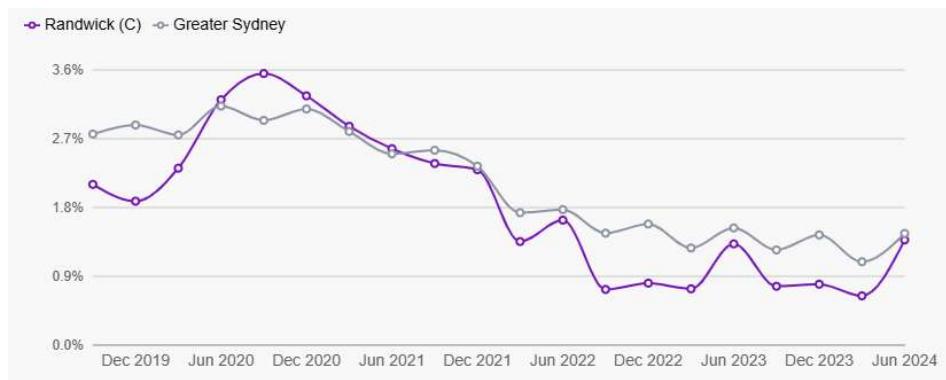
<sup>6</sup> Randwick City Council housing monitor, [.idcommunity](#)



**Figure 5.** Quarterly median house rental prices in Randwick City and Greater Sydney from March 2018 to June 2024 (Source: .id community, Randwick City Council Housing Monitor 2024).



**Figure 6.** Quarterly median unit rental prices in Randwick City and Greater Sydney from March 2018 to June 2024 (Source: .id community, Randwick City Council Housing Monitor 2024).



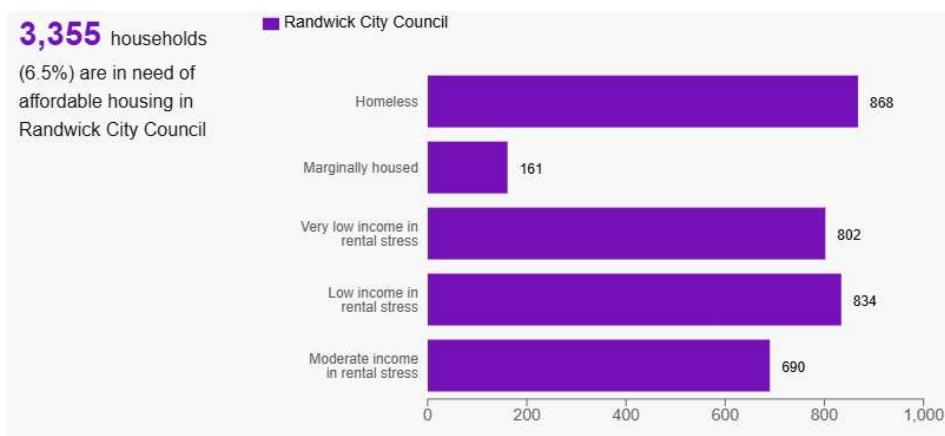
**Figure 7.** Quarterly rental vacancy rate for Randwick City and Greater Sydney from September 2019 to June 2024, highlighting a temporary high rate during the pandemic (Source: .id community, Randwick City Council Housing Monitor 2024).

### Affordable housing need

The 2021 Census shows 3,355 households have an unmet need for ~~social~~ and affordable housing in Randwick City, representing 6.5% of all households. Of all household types in need, 772 households were families comprising parents with children who were the largest group of households that are unable to access affordable rental housing within the LGA<sup>7</sup>.

Between 2016 and 2021, net migration resulted in 3,393 Randwick residents moving to Bayside LGA while a further 937 residents moved to Sutherland Shire and 607 moved to the Central Coast<sup>8</sup>. More recent data between 2021-2023 indicates a further 1,744 Randwick residents have moved to Bayside LGA, 555 residents to Sutherland Shire and 386 to the Central Coast<sup>9</sup>.

While it is recognised that numerous factors influence the decisions as to where one lives, such as changing housing and economic opportunities, if residents of working age are unable to access affordable housing in and around Randwick City, they may need to secure more affordable housing further away from the LGA. This extends commuting distances and could limit the ability of businesses and critical services to access a suitable labour pool. An increase in the supply of new affordable rental housing is critical to address the loss of residents.



**Figure 8.** Households in the Randwick City LGA that were identified as in need of affordable housing through the 2021 census (Source: .id community, Randwick City Council Housing Monitor).

Whilst the data indicates that 6.5% (3,355) of all households on very low to moderate incomes are in need of affordable housing, over 1,000 households (approx.1.9%) 1.5% of total households are on social housing waitlists, it is therefore expected these households needs to be met through social housing provision by the state. The remainder of households that are in affordable housing is 4.6% (approx. 2,476), however the number of households that meet income eligibility requirements for affordable housing is an estimated 2.5% (approx.1,346) of all households, which is adjusted to consider those on moderate and 50% of those on low-income households.

### Meeting Affordable Housing Need

Considering a figure of 2.5% of all households in need of affordable housing, it is expected that much of this is being met through the range of measures that sit outside of Council including:

<sup>7</sup> Randwick City Council housing monitor, idcommunity

<sup>8</sup> ibid

<sup>9</sup> ABS, Regional Internal Migration Estimates (RIME) by LGA

- State Environmental Planning Policy (Housing 2021): to deliver affordable housing units for a period of 15 years (managed by a registered community housing provider)
- Community Housing Providers own programs using funding from state and federal government
- NSW Government's own programs for increased provision of both affordable and social dwellings.

The key priorities and actions in this strategy are aimed at boosting affordable housing through both the measures above and through Council provision. Furthermore, the priorities and actions will seek to address general affordability challenges for private rental housing. Therefore, any initiatives undertaken by Council will play an important role meeting the unmet need for affordable housing.

### **Social housing need**

Continued investment in affordable and social housing is required to maintain resilient communities, reduce homelessness and minimise housing stress for low-income households. There is a growing waiting list of for households with over 1.9% (1,000) of all households on a waitlist for social housing meaning there is a significant unmet need for social housing.

*To help meet demand, Homes NSW, representing the Housing Agencies, continues to investigate opportunities to increase the number of social housing dwellings. To help meet demand, the NSW Land and Housing Corporation (LAHC) will be progressively increasing the number of social housing dwellings over the next five years.* Typically, social housing tenants are older, past working age and live alone – 93% rely on the age, disability or another pension for income. In the 1970s, 70% of tenants were couples with children – now they represent just 4% across NSW. The average household size of social housing tenants within the Randwick LGA is 1.3 compared to 2.6 for other households in the LGA.

Most of the dwellings owned by LAHC within the Randwick LGA were built in the 1960s and 1970s comprise one and two bedrooms and are becoming costly to maintain and manage.

### **Essential worker Housing**

Council's current Housing Strategy defines an essential worker (key worker) housing as affordable, accessible, and strategically located housing specifically designated for workers in critical sectors such as healthcare, police, education, emergency services, and public transport. It can also include low-paid private sector workers in the tourism and hospitality industries such as wait staff, cleaners, shop assistants, and cooks.

The Housing Strategy specifies that such housing should be located within reasonable commuting distances to employment centres to ensure essential workers can perform their duties effectively and without unnecessary interruptions.

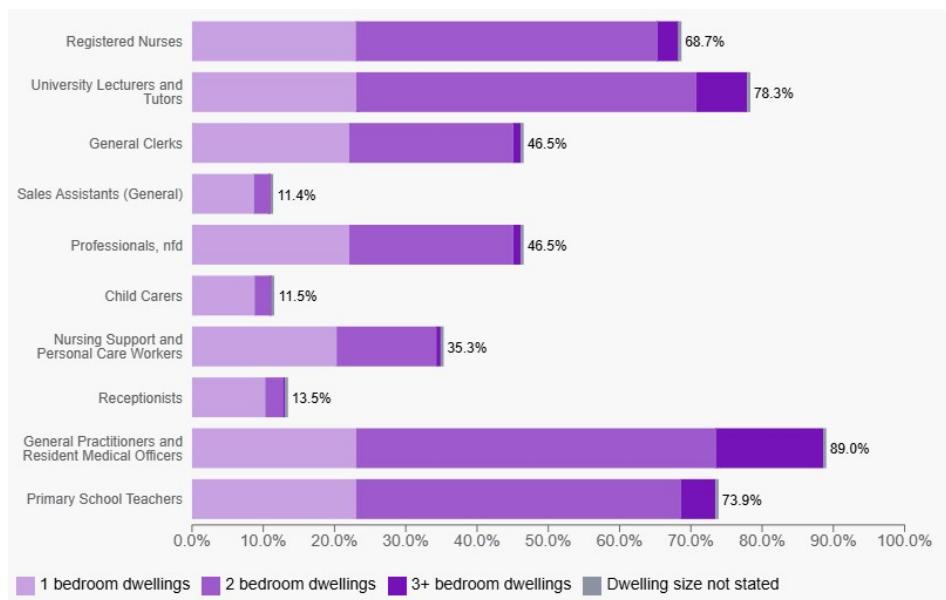
Significant employment growth in health, education and research is expected to continue within the Randwick Strategic Centre comprising the Randwick Hospitals campus, UNSW and surrounding town centres. Census data shows that between 2016 and 2021, there was a decline in the number of local workers employed in 'Community and Personal Services' which comprises workers in health care, aged care, child care, hospitality, emergency and other personal services (from 6,665 to 5,762 persons, a drop of 903 workers). Compared to Greater Sydney, the Randwick LGA has a lower proportion of persons employed in these industries (8.3% compared to 9.3%).

With a recognised need to ensure essential workers can live within proximity to their place of work to ensure essential services can be maintained within the community it is important that housing is affordable for those essential workers on lower incomes. With very little market

housing available to those on lower incomes, data shows an increasing number of essential workers reside outside of the LGA.

The Parliamentary Inquiry findings are expected in June 2025. Council's submission outlined the significance of the Randwick Strategic Centres as a health and education precinct and the demand for essential workers in this area. The submission also acknowledged the importance of the Inquiry in setting planning direction and outlined possible measures to ensure any state government reforms adequately addresses affordable essential worker housing needs in the Randwick LGA.

It is anticipated that the findings of the inquiry will provide clarity in the definition of essential workers to identify the need for increased investment in essential worker housing using zoning and planning reforms.



**Figure 9.** Affordable Housing available for workers from June 2023 to June 2024 (Source: .id community, Randwick City Council Housing Monitor 2025).

## 5. What are the Affordable Housing challenges?

As outlined in Part 3 of this Strategy, as is the case across Greater Sydney, there is an undersupply of affordable housing across the Randwick LGA. There are numerous market and macro-economic factors impacting housing affordability, some of the key considerations are summarised below.

### 5.1. Wage stagnation

As housing affordability is directly linked to income, while housing prices have risen, wage growth has not kept pace leading to a loss of affordable dwellings.

In the previous 5 years ending June 2024, median house rents have increased by an average of 8.4% per annum in the Randwick LGA while median unit / apartment rents have increased by an average of 5.9% per annum<sup>10</sup>. Wage price index growth across Australia over the same period has averaged 2.74% per annum<sup>11</sup>. As such, this has led to a continued loss of affordable housing stock for various income groups, despite substantial dwelling approvals across the LGA.

Based on latest available figures, 2006 & 2016, the proportion of affordable rental stock had reduced by approximately:

- 78% for very low-income households (from 8% to 1.7%)
- 72% for low-income households (from 18.1% to 4.9%)
- 43% for moderate incomes (decreased from 62% to 35%)<sup>12</sup>

It is expected that since 2021, further reductions would be prevalent today due to increasing land/property values, increased rents and other considerations such as inflation. As a result, more households are placed under housing stress (defined as paying 30% or more of income on housing costs) which has further implications on a household's ability to pay for other primary needs.

### 5.2. Decreased provision of social housing

Data from the Australia Institute indicates that 16% of all residential construction in Australia between 1945 – 1970 was for the purposes of public housing (social housing) and this had significantly decreased to just 3% by the mid-1990s<sup>13</sup>.

Within the Randwick LGA, in 2001, 7.5% of households were living in social housing. By In 2021 this had~~s~~ dropped to 6.1% (a decrease of 1.4%). Whilst there was a decrease in those housed in social housing, the need for social housing still exists with a waitlist of over 1000 households. It is noted that since the 2021 census new data from Homes NSW now indicates that provision of social dwellings has increased with the total number of social dwellings in the Randwick LGA currently sitting at 6.8% of all dwellings<sup>14</sup>. this A significant need for social housing should also be considered when determining affordable housing need as shortfall in social housing places further pressure on the competition for affordable housing and low-cost housing.

<sup>10</sup> PropTrack Data, Randwick Housing profile

<sup>11</sup> Wage Price Index, June 2019 to June 2024, Australia Bureau of Statistics December 2024

<sup>12</sup> NSW Local Government Housing Kit 2016 – accessed 2024

<sup>13</sup> The Australia Institute publication 'For more affordable housing we need more public housing' 16 February 2024 (accessed 30 April 2025).

<sup>14</sup> NSW Government Local Area analysis – Randwick <https://www.nsw.gov.au/departments-and-agencies/homes-nsw/social-housing-resources/local-area-analysis-randwick>



**Figure 10.** Decrease in social housing tenancies between 2001 and the most recent 2021 census data (source .idcommunity - Randwick City Council Community Profile).

### 5.3. Competition for residential floorspace

The northern suburbs of Randwick City contain large tertiary education institutions such as the University of New South Wales, the National Institute of Dramatic Art, and Randwick TAFE. This has resulted in a higher-than-average student housing (co-living) provision in Randwick City when compared to most councils in NSW. In addition to the established clustering, increasing enrolment numbers of international and domestic students are driving demand for conveniently located student housing.

The following table outlines the number of dwellings and student/boarding (co-living) housing rooms that have been approved in the Kensington and Kingsford Town Centres, with construction in the pipeline, together with proposals that are currently under assessment:

**Table 3.** Dwelling approvals in Kensington and Kingsford town centres as of January 2025

Development Application Stage	Private Dwellings	Co-living (student/boarding housing)	Total
<b>Approved</b>	215	2,367	2,582
<b>Under assessment *</b>	213	642	855
<b>Total (excluding refused)</b>	<b>428 (12%)</b>	<b>3,009 (88%)</b>	<b>3,437 (100%)</b>

\*excludes UNSW/Iglu DA comprising 1015 rooms? (215B Anzac Pde Kensington located outside the town centre)

A key concern regarding recent trends for student housing are the potential impacts on housing affordability, with these types of developments catering for higher cost short term residences as opposed to long-term dwellings. The take up of major redevelopment sites for the purposes of student housing, results in fewer sites remaining available for residential (apartment) development, therefore perpetuating the undersupply of housing for longer term residents. This undersupply in turn has implications on housing affordability due to supply and demand factors

which is a critical issue given that Randwick City has some of the highest housing costs in Australia.

The proliferation of student housing also has an impact on housing diversity by catering only to a limited demographic and tenure type. Concentrating a single (commercial) use in certain locations reduces the opportunity to deliver a variety of housing types. Considering the diverse nature of our community, it is important that a variety of housing options are available that offer choice of dwelling size, tenure type and price points to accommodate the housing needs and lifestyle preferences of different age groups and household types. Further, the base current market price for a typical single student housing room (17sqm) start at prices of \$699 per week<sup>15</sup> placing this type of accommodation out of reach for many student groups. As expressed by Universities Admissions Centre (UAC) 2024 Student Lifecycle and Learning Report, current students are more concerned about cost-of-living pressures (such as the cost of housing and rent) than previous cohorts. In 2024, cost is an issue for 43% of students choosing where to study, up from 34% in 2023<sup>16</sup>.

With the cost of purpose-built student housing sitting well above the cost of entry level private rental accommodation in the area<sup>17</sup>, many students may be reliant on private rental accommodation to meet their housing needs putting further pressure on the supply private rental dwellings. Furthermore, those that are eligible may be utilising affordable housing to meet their housing needs creating further pressure on affordable housing.

#### 5.4. Mismatches in household structures and housing

Based on Randwick City Council's Housing Monitor<sup>18</sup>, there are over 155,000 bedrooms within the Randwick LGA accommodating approximately 144,598 people.

An analysis was undertaken based on lone person and couples (without children) households within the Randwick LGA with assumptions about utilisation of bedrooms within these household types as they are typically simpler than the composition of larger households.

The analysis indicated that there is potentially up to 10,000 spare bedrooms within separate houses, medium density and high-density dwelling types within the LGA when compared to the number of persons living in each household.

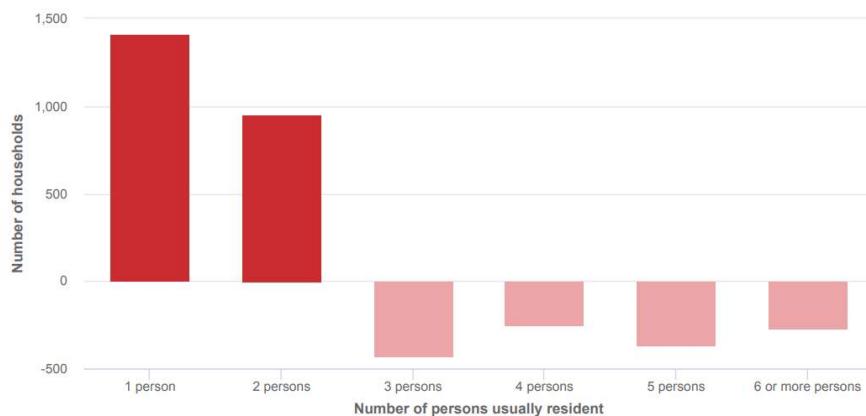
Considering temporal changes in Randwick City from 2016 to 2021, data shows that there was a broad decrease in lone person and couples (without children) households occupying smaller dwellings and a corresponding increase in lone person and couples (without children) households occupying 4+ bedroom dwellings. Such trends may reflect broader moves towards larger living spaces and changing lifestyles, such as working from home, potentially resulting in more spare bedrooms within homes.

<sup>15</sup> Scape Kensington (1 room in 2 bed suite) – accessed 5 June 2025.

<sup>16</sup> UAC Student Lifestyle and Learning Report 2024, accessed 12 NOV 2024

<sup>17</sup> Randwick City Council housing monitor, idcommunity, accessed 30 April 2025.

<sup>18</sup> Randwick City Council housing monitor, idcommunity



**Figure 11.** Change in household size in Randwick City from 2016 to 2021 (Source: .idcommunity, Randwick City Council, Community Profile).

### 5.5. Impacts of short-term rental accommodation

Short Term Rental Accommodation (STRA) refers to a residential dwelling used to provide accommodation on a commercial basis for a temporary or short-term period. In NSW there are two types of STRA, 'Hosted' refers to accommodation provided within the hosts usual place of residence and 'Non-hosted' refers to accommodation that is provided where the host does not reside i.e. a residential dwelling purchased for the primary use of providing STRA.<sup>19</sup>

The rise of online booking platforms has seen a global increase in the number of STRA dwellings at the same time many cities face further pressures on the affordability of housing. It is noted that in terms of STRA, 'non-hosted' accommodation is considered to create significantly more issues than 'hosted' as it often involves taking a dwelling that would otherwise be rented on a long term basis or purchased by an owner occupier and utilising it primarily for the purpose of STRA. In NSW this issue has led to a 180 days per year cap on non-hosted STRA and introduction of a STRA Register. The Byron Shire has now introduced a 60 day per year cap on the use of residential dwellings as non-hosted STRA due to the significant impacts on rental housing supply.<sup>20</sup>

In terms of the Randwick LGA the register identifies that there were a total of 1596 properties on the STRA with 1012 of those properties registered as non-hosted properties. Due to Randwick's attractiveness to tourists visiting Greater Sydney the demand for STRA is strong. This has the potential to significantly reduce the number of residential dwellings available for long term residential tenancies and therefore increasing scarcity and prices within the LGA.

#### Impacts of net loss of dwellings

Recently, evidence has emerged in three of Randwick's neighbouring LGAs indicating that developments are leading to a net loss of dwellings on site including:

- Dwelling houses: multiple lots containing separate dwellings being converted into one large dwelling house.

<sup>19</sup> NSW Planning – Short-term rental accommodation accessed 03 April 2025 <https://www.planning.nsw.gov.au/policy-and-legislation/housing/short-term-rental-accommodation/review-of-short-term-rental-accommodation-framework>

<sup>20</sup> NSW Planning – Byron Shire Short-term rental accommodation accessed 03 April 2025 <https://www.planning.nsw.gov.au/policy-and-legislation/housing/short-term-rental-accommodation/byron-shire#new-provisions-specific-to-byron-shire>

- Existing Residential Flat Buildings (RFB): alterations to the floor plan of existing RFBs to amalgamate multiple residential units into one ultimately resulting in a net loss of dwellings on site.
- New Residential Flats Buildings: demolition and redevelopment of older RFBs often accommodating 'low-cost housing' to provide a new RFB development that contains fewer dwellings on site with a more expensive housing product in terms of purchase price and associated strata fees.

All three Councils have raised concerns around the last example which is contributing to the cumulative loss of 'low-cost dwellings' through the delivery of larger luxury apartments in prime locations. A notable development proposal cited by the City of Sydney, is the loss of a 'low-cost' building containing 28 residential units being demolished to be replaced with 20 luxury apartments.

A notice of motion at the March 2025 Council meeting has raised this issue for consideration within the Randwick LGA. Council staff have undertaken research on recent development applications, revealing a potential risk that this type of development may contribute to affordable housing supply issues in the Randwick LGA.

## 6. Who delivers affordable housing and how?

### Federal Government

- Sets overall targets and objectives for housing across Australia
- Provides funding to state and local government organisations and to eligible house delivery providers such as CHPS

### State Government

- Delivers social and affordable housing through its umbrella organisation of Homes NSW.
- Sets Strategic objectives and targets
- Legislative requirements for the delivery of affordable housing under State Environmental Planning Policy (Housing) 2021.

### Local Government

- Sets LGA specific affordable housing targets and objectives through strong policy
- Requires affordable housing contributions through planning provisions
- Delivers affordable housing utilising contributions both in-kind and monetary

### Not-for profit organisations

- Delivery of affordable housing through community housing providers and other innovative models of affordable housing delivery.
- Community Housing Providers to manage affordable housing required under State Environmental Planning Policy (Housing) 2021.

#### 6.1. Federal and State government programs and funding

Given that the Federal Government collects the majority of tax revenue, it is responsible for the majority of funding for the social housing sector and a significant proportion of the affordable housing sector<sup>21</sup>. This funding feeds into state, local and non-government organisations delivery programs. The Federal government can also utilise tax structures to encourage the private sector to deliver further affordable housing in their developments.

At a state level, Homes NSW ~~an umbrella organisation representing all NSW Government housing agencies, has recently committed to a number of current and future projects (formerly NSW Land and Housing Corporation) have recently committed to a number of current and future projects~~ that will significantly increase the number of social housing dwellings over the next five – ten years. The projects will focus on redeveloping existing State Government landholdings to deliver a net increase in social and affordable dwellings, whilst also providing homes that are more sustainable and fit-for-purpose.

The State programs above are delivered largely utilising two key Federal Government funding mechanisms that include the Affordable Housing Bond Aggregator (AHBA) and the Housing Australia Future Fund (HAFF) and ~~two state managed funds~~, the NSW Community Housing Innovation Fund (CHIF) ~~and Social and Affordable Housing Fund (SAHF) both~~ managed by the ~~Homes~~ NSW Department of Communities and Justice.

State government organisations also can also generate funding through innovative models that leverage their landholding for commercial interests.

<sup>21</sup> Australian Bureau of Statistics, 2018, Taxation Revenue Australia 2017-18, Commonwealth of Australia, Canberra

## 6.2. State Planning Legislation

State Environmental Planning Policy (Housing) 2021 (Housing SEPP) contains provisions for 'In-fill affordable' housing to further enable the delivery of affordable housing through development proposals. The provisions offer uplift bonuses in certain zones if affordable housing is provided on a site for a period of at least 15 years. Additionally, the Housing SEPP levies a contribution for development that results in the loss of 'affordable' or 'low-rental dwellings' across the site. Based on the number of approved applications should deliver the equivalent of at least 23 affordable dwellings.

The Housing SEPP supersedes a number of repealed State Environmental Planning Policies (SEPPs) that aimed to protect and deliver affordable and low-cost housing. These SEPPs include:

- **SEPP 10 (Retention of Low Cost Rental Accommodation) 1987** aimed at protecting low-cost rental housing existing stock. Key aspects included minimum allocation requirements for affordable housing as a contribution or requiring those properties to be managed by approved community housing providers for a minimum period—typically at least 15 years.
- **SEPP 2009 (Affordable Rental Housing)** incentivised the development of affordable rental housing through bonus provisions for in-fill projects, outlined guidelines for innovative housing models (including secondary dwellings and group homes), and ensuring that newly delivered housing remains affordable over the longer term.
- **SEPP 70 Affordable Housing (Revised Schemes) 2002** provided a framework for securing the delivery of affordable housing in areas experiencing upzoning or redevelopment and allowed local councils to impose monetary or in-kind contributions on development proposals that result in the loss of affordable housing through demolition, alteration, or conversion. This led to selected local councils developing affordable housing contribution schemes for specified precincts.

Whilst the repealed SEPPs led to some provision of affordable housing, the level of provision and affordability achieved is largely unknown due to a lack of reporting and regulatory requirements implemented at the time of the SEPPs.

In June 2025 for both state and federal governments have acknowledged similar gaps in the current reporting and regulatory gaps for affordable housing in the Housing SEPP and therefore have recommended the following to be implemented:

- Reporting of data on what exists and what is in the pipeline to track affordable housing delivery in the LGA;
- Lack of clear management expectations and enforcement capability;
- Repercussions for lack of compliance by developers;
- General gaps in the information available to support strong affordable housing delivery.

Council through this strategy has also identified gaps to affordability within the Housing SEPP, such as co-living provisions that support high-cost student housing over standard residential development and restrict the provision of secondary dwellings, this is further addressed in Section 9.

### 6.3. Local Government Level

At a local level, councils can influence affordable housing through a range of mechanisms. The three key areas are:

1. **Local planning framework:** facilitates the delivery of affordable housing through in-kind dwelling dedication to Council or monetary contributions.
2. **Implementing Affordable Housing:**
  - a. Developing Councils landholdings for the purposes of affordable housing using funds collected through planning provisions and through a range of models including partnerships with Community Housing Providers or;
  - b. Purchasing existing dwellings stock including individual units in strata schemes or an entire residential flat building for the purposes of affordable housing.
3. **Advocacy to State and Federal Government and other stakeholders:** for increased funding and delivery of affordable and social housing within the LGA and improved policy and regulatory structures that impact general affordability and diversity of new stock.

Randwick City Council existing efforts in ensuring the communities needs are met aligns with the above approaches as outlined in section 7. Whilst section 8 of the strategy sets a target for the strategy to meet the housing needs of the community within the next 10 years by utilising all three of the above mechanisms available to Council, this is reflected in the priorities and actions outlined in section 9.

### 6.4. Registered Community Housing Providers

Community Housing Providers in a NSW context are registered and accredited not-for profit organisations with a primary function as the managers of affordable and social housing. The housing providers commonly manage housing for both state and local government organisations as well as private developers who are required to provide affordable housing in new developments. Many CHPs often participate in partnerships with other organisations or utilise government funding to develop or acquire dwellings that can be used to leverage for ongoing affordable provision and ensure future economic viability of the organisation.

The use of housing providers is not only common in Australia but is commonly used in countries around the world that provide affordable and social housing. An example that is comparable to Australia is the use of Housing Associations in the UK. In Greater London, local Council's traditionally have been responsible for the delivery and management of social housing, however as this stock reaches the end of its life, large scale housing estate regeneration is being typically funded by Housing Associations<sup>22</sup>. Furthermore, with the delivery of affordable housing major residential developments under the London Plan, are required to provide a minimum of 35% affordable housing on private land and 50% on public or industrial land<sup>23</sup>. With this level of affordable housing provision, Housing associations have become vital in the delivery and ongoing management of affordable housing.

In NSW, CHP's have played a key role in developing and managing affordable housing. Their skills and expertise include:

- Delivery of affordable housing by accessing a range of funding sources and other resources, particularly Tier 1 and 2 registered providers who have capacity and expertise to develop at scale.

<sup>22</sup> Bringing affordable housing to scale, Committee for Sydney December 2022  
<sup>23</sup> The London Plan 2021 (Policy H5) – accessed 30 April 2025.

- Ongoing management of affordable housing that falls outside the traditional role of local government in NSW. CHPs hold the required skills and experience to ensure affordable housing is managed appropriately and tenants are supported.

### 6.5. Aboriginal Housing

Aboriginal Housing Office (AHO) is a statutory body established under the Aboriginal Housing Act 1998 (NSW). The body ensures that Aboriginal and Torres Strait Islander people have access to affordable, quality housing. Along with a range of social and economic functions, the AHO provides housing services in the form of both Asset Management and Tenancy Management by partnering with housing providers<sup>24</sup>.

The AHO portfolio currently contains 74 dwellings within the Randwick LGA with 7 managed by registered Aboriginal Community Housing Providers and 67 managed by the Department of Communities and Justice<sup>25</sup>.

#### 6.6.6.5. Innovative not-for profit models

The following case studies illustrate innovating affordable housing examples across New South Wales and Victoria. They highlight the role that partnerships and funding can play in delivering affordable housing dwellings and provide inspiration to future affordable housing projects across Randwick City.

##### Nightingale Marrickville – 387 Illawarra Road, Marrickville



**Figure 12:** View of Nightingale Marrickville from Illawarra Road, Marrickville (Source: [www.nightingalehousing.org](http://www.nightingalehousing.org))

Nightingale Marrickville was completed in 2024 and contains 54 apartments which includes shared spaces for laundry, gardening, dining and socialising. To deliver the project, Nightingale partnered with the not-for-profit organisation Fresh Hope Communities with the churches of Christ in NSW and ACT providing a 99-year ground lease to enable the development. The

<sup>24</sup> Aboriginal Housing Office, accessed 28/03/2025 – <https://www.aho.nsw.gov.au/about/what-we-do>

<sup>25</sup> AHO dwellings by LGA and management category as at 30 June 2024 – <https://www.aho.nsw.gov.au/reporting/aho-dwellings-lga-and-management-category-30-june-2024>

apartments are made available to rent at rates that are 20% lower than market value. As a principal Nightingale aims to pre-allocate up to 20% of their homes to community housing providers for affordable housing.

#### Gibbons Street, Redfern – 11 Gibbons Street Redfern



**Figure 13:** View of Gibbons Street, Redfern

(Source: <https://architectureau.com>)

Gibbons Street, Redfern was completed in 2021 and contains 162 units, comprising 42 social housing and 120 affordable housing units. Key amenities of the development include ground floor commercial space, community recreation areas, a new St George Community Housing Office and a playground. The building provides 27 adaptable housing units for residents with disabilities, and 40% of the units are allocated to Aboriginal and Torres Strait Islands people housing.

The City of Sydney sold the land to St George Community Housing at a discounted rate in order to increase the number of affordable and social housing dwellings across the LGA. The project was partly funded by the National Housing Finance and Investment Corporation [and grant funding from the Department of Communities and Justice<sup>26</sup>](#), developed by and owned and operated by St George Community Housing.

<sup>26</sup> NSW Government – Develop affordable rental housing <https://www.nsw.gov.au/housing-and-construction/social-affordable/affordable-rental-housing/develop>

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## 7. What are we currently doing?

### 7.1. Review of actions / outcomes from 2018 strategy

In 2008 Randwick City Council's Affordable Housing Strategy and Action Plan was formally adopted and identified the need to facilitate affordable housing especially for lower income households who live and/or work in Randwick City. Since its implementation, a key focus for Council has been to increase the supply of affordable rental housing through the legislative planning framework.

### 7.2. Affordable Housing Contribution Schemes Implemented by Council

In Randwick City there are currently two affordable rental housing contribution schemes that operate. These include:

1. The Kensington and Kingsford Town Centres Affordable Housing Plan commenced in 2019 and applies a 3% or 5% affordable housing contribution rate dependent on the time of the development application (DA) lodgement. The rate applies to the total floor area of the development that is used for residential purposes and had the aim of delivering approximately 200 affordable rental dwellings over 15 years.
2. The Housing Investigation Areas Affordable Housing Plan commenced in 2023 and applies a 3% or 5% affordable housing contribution rate dependent on the site location. The rate applies to the total floor area of the development that is used for residential purposes and aims to deliver approximately 99 affordable rental dwellings over 15 years.
3. A proposed draft affordable housing contribution plan is currently proposed for the Randwick Junction Town Centre under the Randwick Junction Town Centre Planning Proposal. The draft Randwick Junction Town Centre Affordable Housing Plan seeks to apply a varying affordable rental housing rates on selected sites within the town centre. The rate is proposed to be applicable to the total floor area of the development used for residential purposes.

### 7.3. Affordable Housing Dwellings

Council's existing affordable housing schemes and past initiatives have resulted in 33 dwellings in Council ownership for the purposes of affordable housing. A number of these dwellings have been allocated to transitional housing. Council's existing affordable housing dwellings are managed by CHPs. Council also has also collected significant money from monetary contributions existing and past affordable housing plans and provisions.

## 8. What do we need to achieve?

To address the growing need for affordable rental housing in Randwick City, the Strategy sets a target to increase the proportion of social and/or affordable housing to 7.5% of all dwellings in the Randwick Local Government Area (LGA) by 2036, noting that provision was-is currently at 6.81% at the 2021 Census. This target has been established for the following reasons:

- It is clear and measurable - based on projected household growth to approximately 63,494 dwellings by 2036, achieving the target will require at least 4,761 dwellings classified as social or affordable housing. This aligns with broader housing targets and planned developments in the area.
- It responds to current need, aiming to restore affordable and social housing provision to levels seen in 2001, ensuring low- and moderate-income households have access to secure rental accommodation.
- It can be tracked over time, with census data providing a reliable measure to assess progress toward achieving this housing goal each census year.
- The target takes into account the substantial capacity within the Randwick LGA housing estates to deliver a large proportion (up to 100%) of all required social and affordable housing by 2036.

It should be further noted that the 2036 target of 4,761 includes an existing 3,267 households in social housing (6.1% of all households in 2021). A total of 1,494 new dwellings would be required by 2036 (as shown in Table 4). An updated figure provided by Homes NSW now indicates provision is at 6.8% of all dwellings.

Table 4: Adjusted proposed target for social and affordable housing (7.5% of all dwellings in the Randwick Local Government Area (LGA) by 2036)

Target of 7.5% (4,761) of all households to be affordable by 2036	
6.1% of all households in 2021 already living in social or affordable housing (based on household number of 53,843 household number)	3,267 existing households <u>(as of 2021)</u>
Existing Affordable Housing (CHP and Council dwellings)	265. approx.
Target of 7.5% of all households to be affordable/social by 2036 (based on projected household number of 63,494)	4,761 households projected
<b>To meet current and future need by 2036, an additional 1,494 social or affordable dwellings required.</b>	

The target of achieving 7.5% or an additional 6791,494 social and affordable housing dwellings by 2036 is ambitious. Reaching this aspirational target over the next 10 years will be affected by factors such as:

- Acceptance of the development industry to deliver affordable housing within developments.

- 
- Viability and economic feasibility of the development sector including the cost of materials, labour, land value.
  - State Government and LEP planning frameworks that allow for the provision of affordable housing
  - Progression of the program to develop State own land to increase the stock of social and affordable housing.
  - The success of the strategic vision of Council and its continuation of programs to deliver affordable housing.

The success of delivering this target will be measured by:

- Monitoring census data to measure progress toward achieving this housing goal at each census year.
- Monitoring the redevelopment program of Home NSW in relation to the number of sites redeveloped and the percentage of social and affordable housing provided on the sites.
- Working with CHPs and monitoring to ensure low- and moderate-income households have access to secure rental accommodation.
- Collection of data and monitoring the provisions affordable housing via the planning system including:
  - Delivery through the Housing SEPP
  - The Affordable Housing Plans for Kensington and Kingsford as well as for HIAs.
- Monitoring the success of the delivery of affordable housing undertaken by Council - via the purchase of housing and the development of Council land.

#### **Review of response to actions relating to Affordable Housing within Randwick LSPS and Housing Strategy**

In addition to the achievements to date which have resulted in an increase in the number of affordable housing dwellings (from the collection of monetary contributions and dedication of in-kind dwellings) a number of key actions have also been achieved since the implementation of the Randwick Housing Strategy and Local Strategic Planning Statement in relation to affordable housing. These are outlined in **Appendix one** of this Strategy.

## 9. Strategic Priorities

Given that 6.5% (3,355) of all households within Randwick City have an unmet need for ~~social or~~ affordable housing and that social housing has declined as a proportion of total housing stock, it is appropriate that Council adopts an aspirational target of 7.5% of total housing in the LGA to be social or affordable rental housing by 2036. If achieved, this target will return social and affordable housing provision to 2001 levels.

The 4 priorities identified in this strategy will assist in progressing this target by 2036. The priorities will also harness mechanisms to increase the overall affordability of market rents and support ongoing advocacy efforts by Council for improved outcomes through revised State Government planning provisions and increased funding and delivery of affordable housing by State and Federal Government.

The priorities consider current Council programs (implemented or in the pipeline) that provide ongoing opportunities for affordable housing delivery. The current schemes include:

- The Kensington and Kingsford Town Centres Affordable Housing Plan 2019;
- The Housing Investigation Areas Affordable Housing Plan 2023 and;
- The draft Randwick Junction Town Centre (expected implementation late 2025).

### Priority 1

**Accelerate the delivery and retention of quality affordable and low-cost housing through the use of planning provisions**

### Priority 2

**Provision of affordable rental housing led or supported by Council**

### Priority 3

**Collaboration and advocacy with key government organisations for increased provision of affordable housing**

### Priority 4

**Review and establish processes for the ongoing management of affordable housing**

**Priority 1: Accelerate the delivery and retention of quality affordable and low-cost housing through the use of planning provisions*****Affordable housing targets for uplift (Inclusionary zoning)***

To support continued growth of affordable housing in Randwick City, establishing an affordable housing contributions target will provide certainty and transparency for developers and the community. This will ensure a proportionate share of economic benefits are reinvested in community outcomes. This mechanism known as inclusionary zoning, incorporates requirements for affordable housing as part of rezoning proposals. This mechanism has already been applied to precincts throughout the LGA through affordable housing provisions in the Randwick LEP. Council's existing inclusionary zoning provisions have affordable contribution rates of 3-5%, whilst a planning proposal for Randwick Junction Town Centre (RJTC) will require contributions from 3-9% and will be applied to the A target requiring 10% of total proposed residential floor space to be delivered as affordable housing is considered appropriate as a benchmark to assist in assessing proposals that seek development uplift.

This targetAny proposed affordable contribution rates will be guided by detailed feasibility analysis that will assist in reviewing options for built form, FSR and height controls and seek to maximise affordable housing contributions to a level that is proportionate to the level of economic benefit provided by proposed uplift. Under As per the 'NSW Guideline for Developing an Affordable Housing Contribution Scheme' councils are required to provide the Department of Planning evidence and assumptions used to determine an affordable housing contribution rate. This is to ensure that contribution rates are viable and will not impact on development feasibility and overall housing supply.

**1.1 Action – For sites subject to uplift, require an affordable housing contribution on strategic target of up to 10% of the total proposed residential gross floor space area. All affordable housing rates are to be determined to be provided as affordable housing by a robust subject to feasibility assessment as part of any future planning proposal (inclusionary zoning mechanism).**

***Broader application of an affordable housing contribution***

To address the critical shortage of affordable housing, a broader application of affordable housing contributions will ensure that the responsibility for addressing affordable housing need in the community is shared equitably across all developments, not just those areas subject to development uplift. This approach recognises that all development generates some level of land value uplift and applying an affordable housing contribution ensures a portion of this gain is reinvested into the community, aligning private development outcomes with public benefit.

An appropriate contribution rate would need to be justified by comprehensive feasibility modelling to ensure that contributions are responsive to market conditions across Randwick City. A City-wide contribution rate would be based on the cost of development and would achieve a progressive increase in affordable housing in the Randwick LGA over the long term. concessions to the contribution - could be considered for social and affordable housing providers.

The changes would need to be implemented through a planning proposal prepared in accordance with the Environmental Planning and Assessment Act, 1979. A draft planning proposal must include clear justification and evidence for the changes, endorsed by Council and the Department of Planning before being placed on public exhibition.

**1.2 Action** – For all new development, investigate an LGA wide affordable housing contribution scheme.

**Ensure all new affordable dwellings dedicated to Council or delivered by Council meet a suitable level in terms of design and build quality.**

Whilst all new development must meet the requirements of the National Construction Code (NCC), they must also meet any specific design requirements set out in the applicable Development Control Plan (DCP) and provisions of the Housing SEPP. Units dedicated to Council as affordable housing are expected to be functionally equivalent, or greater than, market-rate dwellings that are within the same development in terms of amenity, facilities and design.

**1.3 Action** – Ensure both dwelling dedications and Council led developments of affordable housing ~~consider~~ meet Council's Affordable Housing Design Guidelines.

#### **Encourage greater utilisation of existing dwellings**

Whilst long term improvements to housing affordability are best achieved through increased supply and a review of tax and regulatory structures there are also other short term solutions that may provide immediate relief to those most affected by the housing crisis. One opportunity lies in the more efficient use of existing dwelling stock. With a conservative estimate of approximately 10,000 underutilised bedrooms across the LGA there is a potential to encourage greater utilisation of these spaces to help alleviate current housing pressure.

Council could develop or support a public awareness campaign highlighting the benefits of sharing spare bedrooms in existing dwelling houses including social and financial outcomes. Furthermore, Council could review planning provisions to enable and encourage minor alterations and/or additions to existing homes to create a secondary dwellings or self-contained living spaces.

**1.4 Action** – A Council program to encourage the renting out of bedrooms in households with spare bedrooms and review planning controls to encourage additional forms of housing such as secondary dwellings to provide housing choice.

#### **Unlock potential for small dwelling opportunities**

Delivering affordable housing requires a multi-faceted approach, including a clear understanding of planning controls that may limit opportunities for the delivery of housing – such as restrictions on secondary dwellings on existing lots. Secondary dwellings can be built with development consent or as complying development, depending on the lot size and floor area of the proposed dwelling.

To be considered as complying development, one of the requirements for the development of secondary dwellings under the Housing SEPP, is that the lot size must be at least 450m<sup>2</sup>. The 450m<sup>2</sup> minimum lot size is a non-discretionary standard, meaning it cannot be varied under a CDC pathway. If the land area is less than 450m<sup>2</sup> a development application is required (except where the secondary dwelling is entirely within an existing dwelling). No additional parking is required for a secondary dwelling however existing parking on site must be maintained.

To support more flexible housing options, a review of the Randwick DCP should be investigated to address design and amenity requirements for secondary dwellings on lots below 450m<sup>2</sup>.

Within the Randwick LGA, a greater proportion of lots below 450m<sup>2</sup> are located in the areas of Randwick, Coogee, Kensington and Kingsford. These areas have greater access to services, employment and transport and are more suitable for increased densities. A review may assist in advocating for flexibility in the Housing SEPP to better support the delivery of affordable housing and supply of diverse housing types in high demand areas.

**1.5 Action** – *Review planning controls to encourage additional forms of housing such as secondary dwellings and self-contained bedrooms, providing housing choice.*

#### ***Identify the impacts of short-term rental accommodation***

Various market trends can affect the availability of housing stock. For instance, online platforms promote and increase the popularity of traditional dwellings being used as STRA. Furthermore, developing luxury apartments on sites (particularly in areas with high amenity or strategically located) that have in the past provided traditional low-cost housing is adding to the supply constraints.

In an effort to increase supply of housing, it is crucial to implement appropriate measures to safeguard existing stock that contributes to the provision of low-cost and affordable housing.

**1.6 Action** – *Investigate the impacts of short term rentals across the LGA and the loss of traditional low-cost and affordable dwellings through the redevelopment of sites to understand the impacts on housing affordability and any impact on essential worker housing provision.*

#### ***Identify and address impacts of net loss of dwellings***

With an apparent growing trend towards the provision of luxury residential flat buildings there is a potential that this may create future affordable housing impacts.

Without safeguards and policy direction this may result in a further affordability impact in the Randwick LGA. The extent of such impacts should be investigated to identify suitable planning provisions if relevant.

**1.7 Action** – *Strengthen planning provisions to address the net loss of dwellings and low-rental housing through demolition/redevelopment.*

#### ***Address competing pressures on residential floor space***

In certain areas of the Randwick LGA close to the University and Hospital there is competition for residential floor space with housing typologies such as student housing often yielding higher returns on investment for developers. To address this, Council can explore the issues, can implement planning incentives to encourage the development of more standard residential apartments.

**1.8 Action** – *Investigate and implement planning incentives and mechanisms to encourage residential apartments in areas where there is competition for residential floor space.*

***Delivery preferences for affordable housing***

Currently Council's affordable housing programs mostly preference affordable housing contributions to be met as 'in-kind' contributions meaning physical dwellings rather than monetary contributions. Feedback from across the industry including community housing providers and developers has indicated that this approach results in a challenge for both community housing providers and developers.

For developers, providing in-kind contributions can be a challenging task due to need for dedicated units to certain meet design requirements and the needs of the community which often results in long negotiations during the development assessment process. Meanwhile, for CHPs an ad-hoc dedication of units can be logically difficult to manage and depending on the development, may come with high strata fees and other costs resulting in units that are not financially sustainable for affordable housing.

In addition to this, CHPs have access to a range of funding that only applies to the delivery of new housing. Therefore, the collection of monetary contributions to purchase land or contribute to the construction of affordable housing programs in partnerships with CHPs could yield a greater provision of affordable housing than in-kind contributions.

**1.9 Action** – *Investigate Council's approach to levying affordable housing contributions to allow flexibility for monetary contributions in lieu of in-kind dedication.*

**Priority 2: Provision of affordable rental housing led or supported by Council**

***Targets for redevelopment of Council owned land***

While it is recognised that there are numerous competing uses for Council owned land, such land provides the opportunity to also be developed for affordable housing. Council's land holdings such as at grade car parks may provide opportunities for redevelopment for the purposes of affordable housing whilst retaining car parking for public purposes should it be required. Furthermore, the use of existing Council land significantly reduces the cost of development as there is no upfront purchase cost.

Council should explore the opportunities for affordable housing delivery on its current sites through a preliminary analysis using the decision-making matrix (appendix 2) and then through a more in-depth analysis if identified suitable. In addition, Council should explore the feasibility of different land uses and the models for delivery on each site to optimise affordable housing.

**2.1 Action** – *For the development of Council owned land, develop a priority list of sites and undertake land use analysis and feasibility assessment to investigate opportunities for the delivery of affordable rental housing.*

***Explore partnerships with industry to maximise housing delivery***

When exploring the development of Council's own land, it is important to consider the role community housing providers can play in the process, with many CHPs not only having the

benefit of operating at scale, but also having access to a range of funding and resources. A range of partnerships models with CHPs or other areas of industry can result in a greater delivery of affordable housing due to the added efficiencies.

Randwick City Council already has productive relationships with some of our community housing organisations. Similarly

Innovative approaches such as Nightingale Housing, the Assembly Model in Victorian and other cooperative housing models across Australia have proven to be successful models for the delivery of affordable housing. The Nightingale model, in particular, is a not-for-profit affordable, sustainable and socially connected approach, where church owned land was redeveloped under a 99-year lease.

Such delivery models can add diversity and new opportunities into the housing market and there is scope for such projects to result in the delivery of higher levels of affordable housing. Further, institutional investors, such as superannuation funds, particularly default funds of essential workers, have the capacity to support affordable housing delivery as part of their member-focussed investment strategies. Where viable and appropriate, Council may consider participating or supporting these models to help address housing affordability in the LGA.

**2.2 Action** – *Explore joint venture opportunities or partnerships with Community Housing providers, Housing Co-Ops or other organisations for delivering affordable housing on Council owned land.*

#### ***Purchasing existing properties using Council's affordable housing reserve***

Through existing affordable housing planning mechanisms, Council has accumulated and will continue to accumulate funds that can be directed for the delivery of affordable housing. The purchase of existing housing stock presents a practical and effective strategy to increase the supply of affordable housing and can be pursued in parallel to maximise Council's contribution to addressing affordable housing in the LGA.

The two key advantages of purchasing existing stock are:

Faster delivery: purchasing existing housing stock allows for a much faster response to housing affordability within the LGA. This approach bypasses the lengthy planning and construction phases. This approach is particularly effective when suitable, good-value properties become available on the market and can be quickly repurposed for affordable housing.

Lower-Risk: the purchasing of existing stock is generally considered to be a lower-risk strategy compared to the development of Council's own land holdings. Development of sites can encounter unforeseen costs and delays, whereas the risks associated with property purchases are typically identified and managed through due diligence prior to acquisition.

**2.3 Action** – *Undertake an acquisition program for purchasing existing stock, for use as affordable housing based on Council's site selection criteria.*

#### ***Priority 3: Collaboration and advocacy with key government organisations for increased provision of affordable housing***

##### ***A strong position on the redevelopment of government owned land***

Within the Randwick LGA, there are significant State Government land holdings that could be investigated for the purposes of affordable and social housing. Some of these landholdings are

close to transport, services and employment which makes them well suited to affordable housing.

Much like the delivery of housing on Council sites, the delivery of housing on State, Federal or Crown land also needs to be subject to feasibility. Past redevelopment may include a proportion of private market housing to ensure financial viability while still prioritising social outcomes. Redevelopment of existing social and affordable housing can lead to significant improvements in living conditions for residents. This may involve upgrading ageing buildings to improve amenity, safety and energy efficiency, as well as addressing issues such as overcrowding or poor accessibility for ageing residents or those with a disability. By incorporating a greater mix of dwelling sizes that are fit-for-purpose, new projects can better support more inclusive and resilient communities.

The Federal Government's Housing Australia Future Fund has enabled greater flexibility and viability in the redevelopment of Homes NSW ~~LAHC~~ sites. Nonetheless Council will continue to advocate for government owned land to remain in public hands for the delivery of the maximum possible number of social housing dwellings on all Homes NSW ~~LAHC~~ redevelopment sites. Council will also advocate for housing outcomes that reflect the needs of those requiring social housing, including a well-considered and appropriate dwelling mix. This should be achieved through meaningful consultation with Council, as well as with both existing and future residents, to ensure developments are inclusive, equitable, resilient and responsive to community needs.

**3.1 Action** – For the redevelopment of existing social housing sites advocate for 100% social housing to be retained, whilst ensuring a mix of dwelling sizes that is appropriate to the needs of the community. Council will advocate for a high level of engagement with both Council and social housing residents in the redevelopment of these sites.

#### **Ensure quality delivery housing and improved data reporting for social and affordable housing**

As the delivery of social and affordable housing accelerates – particularly through Homes NSW redevelopment of housing estates- it is essential that developments not only increase the quantity of housing stock but also meets high standard of design, liveability and integration within the broader streetscape and built form. Currently publicly available data on the pipeline of social and affordable housing- particularly from Homes NSW is limited. Significant gaps in data and reporting make it difficult to accurately assess the current supply, forecast future needs of community and monitor delivery of affordable and social housing against Council's strategic target of 7.5% by 2036. A publicly accessible register would improve transparency and allow for more effective planning and coordination across government and non-government stakeholders.

To address this, Council should advocate for a publicly accessible register of social and affordable housing, including data on location, dwelling type, delivery timelines and affordability levels. Improved transparency would build community confidence in the delivery of affordable and social housing.

**3.2 Action** – Advocate to Homes NSW to increase the number of social and affordable dwellings through high-quality redevelopment of their strategic sites and for improved data in relation to housing delivered and in the pipeline in the Randwick LGA.

**Affordable Housing as essential infrastructure**

Substantial investment in Health Infrastructure projects within the Randwick Health and Innovation Precinct has delivered wide ranging benefits, including improved health facilities and services, expanded research capacity and creation of jobs in the health care sector. However, this redevelopment has highlighted the challenges regarding housing for workers and has added to the pressure on the local housing market. This expansion has highlighted the gap in the provision of housing needed to support the workforce in the existing and new institutions. Affordable housing should be recognised and planned for as essential infrastructure- integral to the functioning of this major precinct in Randwick City.

Council should advocate to government agencies for the inclusion of affordable housing for essential workers as a core component of large scale redevelopment or master planning projects. This includes significant health and education proposals, and other development on Crown land. This advocacy should emphasise the growing demand for essential worker housing within the LGA and the need to support them through the provision of affordable housing located on-site or in proximity to their workplace. Doing so would not only support the retention of the existing workforce but also contribute to well-being and a more resilient and inclusive local economy.

**3.3 Action** – Advocate for *affordable\_essential/key worker housing that is affordable* to be delivered as essential infrastructure required to support large scale non-residential redevelopment on government land or in proximity to *proposed new transport* infrastructure.

**Work constructively with industry**

Randwick City Council has a comparatively high proportion of social housing relative to other LGAs in Greater Sydney. However, meeting the growing demand for social and affordable housing, will require coordinated investment across all levels of government. While State-led programs and policies play an important role, additional funding from the Federal Government is essential to supplement State programs to maximise the potential of local affordable housing initiatives by councils and not-for-profit housing providers.

Beyond increased direct funding, broader reforms are needed to create a more equitable and sustainable housing system. Current tax structures tend to favour established homeowners and investors<sup>27</sup>. A more equitable direction for broader housing opportunities requires a holistic review of the tax and regulation policies that encourage affordable and diverse housing delivery by developers. This could include tax incentives for downsizers (to free up underutilised housing stock) and further support for first home buyers.

**3.4 Action** – Work constructively with industry to advocate for increased Federal government investment in social and affordable housing and a review of property tax and regulatory structures to address barriers for downsizers, disadvantages to first home buyers when competing against investors and to explore incentives or regulation to prioritise the delivery of low-cost and affordable housing over luxury developments.

**Affordability of Co-living developments**

<sup>27</sup>A blueprint to tackle Queensland's housing crisis (Pawson, et al., 2020)

Co-living housing, whether designed for student housing, essential workers or other household types present an opportunity to diversity and improve affordability outcomes. These developments typically offer smaller more efficient private living spaces complemented by shared communal spaces, which may reduce housing costs whilst fostering social interaction and a sense of community amongst residents. However, much of Co-living currently available within the LGA is being offered at rentals that exceed those in comparable private dwellings. This pricing structure places such housing out of reach for many groups such as students, essential workers and other household types and may contribute to increased pressure on surrounding private rental market.

To ensure that Co-living contributes meaningfully to housing affordability, legislative changes to the Housing SEPP is needed. One option is the introduction of a minimum affordability benchmark, requiring a proportion of rooms within co-living to be offered at affordable rates, aligned to income level of occupants. This could also be tied to an inclusionary zoning framework for proposals seeking an uplift in density and height.

Council has an opportunity to advocate to the NSW Government for amendments to the Housing SEPP that promote clearer guidance, deliver affordability outcomes and provide targeted support for essential workers and students on lower incomes.

**3.5 Action** – Advocate to the NSW Government to require address the affordable dwellings within all of Co-Living developments through the planning system to provide for students and essential workers.

#### ***Impacts of vacant homes***

With levels of supply not currently meeting demand for housing in Randwick City, it is important to consider the pressure vacant homes places on rental affordability. In Randwick City, the 2021 Census indicates that there are more dwellings than households, recording 59,971 dwellings compared to 53,828 households. This tends to suggest that vacant homes may have a significant impact on supply issues. Whilst there are instances where vacant homes may exist for valid reasons such as properties for sale or deceased estates awaiting redevelopment, there are still homes being left vacant for investment reasons or in some instances for developers 'land banking'. Council or State government could look at options to encourage the renting out or sale of properties that are vacant for more than 12 months with one possible option being a levy with exceptions for valid circumstances as mentioned above.

With levels of supply not currently meeting demand for housing its important to consider the pressure vacant homes places on rental affordability. With 59,971 dwellings and only 53,828 households at the 2021 Census there is evidence to suggest that a lack of construction is not responsible for all housing affordability issues. As outlined in the strategy the impacts of STRA could contribute to supply issues, but it's important to note vacant homes may also have a significant impact on supply issues. Whilst there are instances where vacant homes may be for valid reasons such as properties for sale or deceased estates, there are is an issue of homes being left vacant for investment reasons or in some instances for developers 'land banking'. Council or State government could look at options to encourage out the renting out or sale of properties that are vacant for more than 12 months with one possible option being a levy with exceptions for valid circumstances as mentioned above.

**3.6 Action – Use existing evidence of vacant homes and sites to advocate to the NSW Government for a levy or other possible mechanisms to address homes being left vacant for more than 12 months or for the most part of 12 months with revenue provided towards Council's affordable housing programs.**

**Improved Definition of affordable housing**

Whilst the ministerial guidelines require rent for all affordable housing to be capped at 80% of market rent and seek to ensure that households on very low and low incomes should not pay more than 25 - 30% of their gross income in rent, it is evident in a Randwick context that 80% of market rent is likely to exceed 25-30% of household income for those on lower incomes is likely to exceed 25-30% of their household income. While Council can ensure that dwellings provided through council programs are provided at no more than 30% of household income, however this does not capture all affordable housing. Affordable housing delivered by developers under the Housing SEPP, particularly those in luxury developments can often well exceed 30% of household income even when capped at 74.9-80% of market rent leading to a product that is not affordable.

To address this issue the Ministerial Guidelines should require capped rent to not exceed 30% of household income for all affordable housing in NSW.

**3.7 Action – Advocate to the NSW Government for the Ministerial Guidelines to be updated to require all affordable housing to be capped at 30% of household income or 74.9-80% of market rent whichever is lesser for the individual household.**

**Priority 4: Review and establish processes for the ongoing management of affordable housing**

***A rental cap on Council owned Affordable Housing***

As outlined in this Strategy, housing is considered affordable if it costs no more than 30% of a household's income. The current Ministerial Guidelines define affordable housing rents must be capped at no more than 74.9% of market rent.<sup>28</sup> In a Randwick City context, 74.9% of market rent often exceeds more than 30% of household income and therefore it is recommended that all affordable housing be capped at 30% of household income across the LGA to align Councils existing affordable housing plans.

**4.1 Action – Improve the allocation and management of affordable housing by refining tenancy arrangements around need, based on income and rent in the 'Affordable and Transitional Housing Guidelines' and apply these to new and renewed management contracts awarded to CHPs.**

<sup>28</sup> K2K Affordable Housing Plan 2019, HIA's Affordable Housing Plan 2023, prepared by Randwick City Council

### **A better understanding of affordable housing provision**

Currently there are gaps in the data available to Council such as the occupation category of affordable housing residents and the number of affordable housing dwellings in the LGA outside of Council ownership. In reviewing contracts with CHPs, Council can require reporting on essential workers and can utilise our partnerships with community housing providers for improved data on affordable housing dwelling numbers within the LGA that are not owned by Council. This reporting will allow for Council to better understand the needs of our residents and monitor the future provisions of affordable housing.

**4.2 Action** – *Require better reporting for affordable housing managed by CHPs and owned by Council, including data on essential workers. Also advocate for CHPs to better report data on the number of dwellings within the LGA where ownership sits outside Council.*

## **10. Actions and implementation**

To ensure the delivery of the key priorities and actions, these have been matched with timeframes and corresponding responsibilities that outline the relevant delivery department/s below.

Priority	Actions	Timeframe	Responsible department/s	Implementation
<b>1. Accelerate the delivery and retention of quality affordable and low-cost housing through the use of planning provisions</b>	<p><i>1.1 For sites subject to uplift, require an affordable housing contribution on the strategic target of up to 10% of the total gross proposed residential floor area-space. All to be provided as affordable housing rates are to be determined by a robust feasibility assessment as part of any future planning proposal subject to feasibility (inclusionary zoning mechanism).</i></p>	Ongoing	<b>Led by</b> Strategic Planning	When Planning Proposals are received, request the applicant to submit feasibility testing for verification by Council.
	<p><i>1.2 For all new development, investigate an LGA wide affordable housing contribution scheme</i></p>	Short term	<b>Led by</b> Strategic Planning	Prepare high level feasibility analysis for exploring different market conditions across the LGA to provide justification for a

Priority	Actions	Timeframe	Responsible department/s	Implementation
				<p>new broad-based affordable contribution linked to site redevelopment within a planning proposal. Report to Council</p> <p><b>Within 12 months</b></p>
	<p><i>1.3 Ensure both dwelling dedications and Council led developments of affordable housing <i>meet consider</i> Council's Affordable Housing Design Guidelines</i></p>	Short term	<p><b>Led by</b> Strategic Planning</p>	<p>Require development application drawings to identify dwellings to be dedicated to Council. Amend Development Application checklist</p> <p><b>Within 6 months</b></p> <p>Amend the DCP where relevant to require consideration of the Affordable Housing Design Guidelines before development consent is issued.</p> <p><b>Within 2 years</b></p>
	<p><i>1.4 A Council program to encourage the renting out of bedrooms in households with spare bedrooms and review planning controls to encourage additional forms of housing such as secondary dwellings to provide housing choice.</i></p>	Short term	<p><b>Led by</b> Strategic Planning</p> <p><b>Input from</b> Development Assessment and Regulatory Teams</p>	<p>Establish internal working group to investigate barriers in achieving the use of spare rooms/secondary dwellings within existing floorspace of dwellinghouses</p> <p><b>Within 6 months</b></p>
	<p><i>1.5 Review planning controls to encourage additional forms of housing such as</i></p>	Short term	<p><b>Led by</b> Strategic Planning</p>	Raise through Council's channels and groups such as SSROC.

Priority	Actions	Timeframe	Responsible department/s	Implementation
	secondary dwellings and self-contained bedrooms, providing housing choice.			Develop a Council endorsed submission to be submitted to NSW Government or request a meeting with DPIE <b>Within 12 months</b>
	1.6 Investigate the impacts of short-term rentals (STRA) across the LGA and the loss of traditional low-cost and affordable dwellings through the redevelopment of sites to understand the impacts on housing affordability <u>and any impact on essential worker housing provision.</u>	Short term	Strategic Planning & Development Assessment	Prepare a discussion paper on the impacts of STRA on the long-term rental market <b>Within 2 years</b> Implement a reporting framework to better understand the impacts of the loss of low-cost and affordable housing.
	1.7 Strengthen planning provisions to address the net loss of dwellings and low-rental housing through demolition/redevelopment	Short-Medium term	Strategic Planning	Develop a policy position with to inform future provisions within the RLEP or advocate for further provisions within the Housing SEPP. Report to Council <b>Within 12 months</b>
	<u>1.8 Investigate and implement planning incentives and mechanisms to encourage residential apartments in areas where there is competition for residential floor space.</u>	Medium term	Strategic Planning	<u>To investigate current competition possibly through the commissioning of an external study to inform future provisions within the RLEP.</u> <b>Within 2 years</b>

Priority	Actions	Timeframe	Responsible department/s	Implementation
	<u><a href="#">1.9 Action – Investigate Amend Council's approach to levying affordable housing contributions to allow flexibility for monetary contributions in lieu of in-kind dedication, on a case by case basis.</a></u>	Medium term	<u><a href="#">Led by Strategic Planning</a></u> <u><a href="#">Input from Community Development</a></u>	<u><a href="#">Further engage with industry including key stakeholders that have raised the point during the exhibition. Review against other Council considerations, which may include the commissioning of an external study to support changes to the RLEP affordable housing provisions.</a></u> <u><a href="#">Within 2 years</a></u>
<b>2. Provision of affordable rental housing led or supported by Council</b>	2.1 For the development of Council owned land, develop a priority list of sites and undertake land use analysis and feasibility assessment to investigate opportunities for the delivery of affordable rental housing.	Ongoing	Strategic Planning	Develop a priority list for site development. <b>Within 6-9-12 months</b> Based in this list, undertake detailed feasibility to determine site specific affordable housing yield and cost.
	2.2 Explore joint venture opportunities or partnerships with Community Housing providers, Housing Co-ops or other organisations for delivering affordable housing on Council owned land	Short term/ Ongoing	<b>Led by both</b> Strategic Planning and Community Development	Contact delivery partners of the Innovative case studies included within this strategy for preliminary learnings and to begin process of exploring potential joint ventures <b>Within 6-12 months</b>
	2.3 Undertake an acquisition program for	Ongoing	<b>Led by both</b> Strategic	Implement the program

Priority	Actions	Timeframe	Responsible department/s	Implementation
	<i>purchasing existing stock, for use as affordable housing based on Councils site selection criteria.</i>		Planning and Property Team	
<b>3. Collaboration and advocacy with key government organisations for increased provision of affordable housing</b>	<i>3.1 For the redevelopment of existing social housing sites advocate for 100% social housing to be retained, whilst ensuring a mix of dwelling sizes appropriate to the needs of the community. Council will advocate for a high level of engagement with both Council and social housing residents in the redevelopment of these sites.</i>	Ongoing	<b>Led by</b> Strategic Planning <b>Input from</b> Community Development	When preparing submissions to NSW Government clearly express Council's target to maximise social and affordable housing dwellings on site.
	<i>3.2 Advocate to Homes NSW to increase the number of social and affordable dwellings through high-quality redevelopment of their strategic sites and for improved data in relation to housing delivered and in the pipeline in the Randwick LGA.</i>	Ongoing	<b>Led by</b> Strategic Planning <b>Input from</b> Community Development and Development Assessment	In responding to proposals from Homes NSW, advocate for high quality design including streetscape presentation, landscaping and tree canopy, sustainability, setbacks and pedestrian permeability for large sites.
	<i>3.3 Advocate for <b>affordable</b> essential/key worker housing <u>that is affordable</u> to be delivered as essential infrastructure required to support large scale non-residential re-</i>	Ongoing	<b>Led by</b> Strategic Planning	Address affordable housing provision when providing feedback or in formal submissions on large sites. Raise through SSROC for joint advocacy.

Priority	Actions	Timeframe	Responsible department/s	Implementation
	<i>development on government land or in proximity to proposed new infrastructure: transport infrastructure.</i>			
	3.4 Work constructively with industry to advocate for increased Federal Government investment in social and affordable housing and a review of property tax and regulatory structures to address barriers for downsizers, disadvantages to first home buyers when competing against investors and to explore incentives or regulation to prioritise the delivery of low-cost and affordable housing over luxury developments.	Ongoing	<u>Led by</u> Strategic Planning	Initiate discussions with key players in the industry and write to relevant State and Federal ministers.
	3.5 Advocate to the NSW Government to <u>address require the affordable dwellings within allbility of</u> Co-Living developments through the planning system <u>to provide for students and essential workers.</u>	Short term	<u>Led by</u> Strategic Planning	Advocate for new provisions in the Housing SEPP including a review of co-living provisions to incentivise residential apartments in key areas. Write to NSW Government and raise through SSROC forum <u>within 96 months</u>
	<u>3.6 Action – Use existing evidence of vacant homes and sites to advocate to the NSW Government for a levy or other possible</u>	Short term	<u>Led by</u> Strategic Planning	<u>Build up an evidence base of vacant homes through different means including exploring Sydney</u>

Priority	Actions	Timeframe	Responsible department/s	Implementation
	<i><u>mechanisms to address homes being left vacant for more than 12 months or for the most part of 12 months with revenue provided towards Council's affordable housing programs.</u></i>			<u>Water data then advocate to NSW Government for a levy or other means to address vacant homes</u> <u>Within 2 years</u>
	<i><u>3.7 Action – Advocate to the NSW Government for the Ministerial Guidelines to be updated to require all affordable housing to be capped at 30% of household income or 74.9-80% of market rent whichever is lesser for the individual household and for the guidelines and Housing SEPP to better define CHPs requirements.</u></i>	<u>Short Term/Ongoing</u>	<u>Led by both Strategic Planning and Community Development</u>	<u>Write to the relevant NSW ministers and explore joint advocacy with other Councils and CHPs.</u> <u>9-12 Months</u>
<b>4. Review and establish processes for the ongoing management of affordable housing</b>	<i><u>4.1 Refine tenancy arrangements around need, based on income and rent in the 'Affordable and Transitional Housing Guidelines' and apply these to new and renewed management contracts awarded to CHPs.</u></i>	Short term & ongoing	<b>Led by both</b> Community Development and Strategic Planning	Review the Affordable and Transitional Guidelines and refine agreements with CHPs to address guidelines <b>Within 12 months</b>
	<i><u>4.2 Seek better reporting for affordable housing managed by CHPs and owned by Council, including data on essential workers. Also advocate for</u></i>	Ongoing	<b>Led by</b> Community development <b>Input by</b> Strategic Planning	Ensure all new MoUs with CHPs require this reporting and then review existing contracts.

Priority	Actions	Timeframe	Responsible department/s	Implementation
	<i>CHPs to better report data on the number of dwellings within the LGA where ownership sits outside Council.</i>			

Note – for timeframes, Short term is approx. 2 years, medium term is approx. 5 years and long term is up to 10 years.

## Appendix One

Council actions relating to Affordable Housing within Randwick City Local Strategic Planning Statement and Housing Strategy are provided below:

Randwick City Housing Strategy		
Relevant Objective	Relevant Action	Response
<b>4. Increase affordable rental housing across Randwick City</b>	<p>4.1 Review and update the Randwick Affordable Housing Strategy and Action Plan</p> <p>4.2 Identify appropriate areas to apply an affordable housing contributions scheme requiring a proportion of all development to be dedicated as affordable housing and amend LEP 2012 to give effect to this.</p>	<p><b>Underway</b> – Draft strategy prepared and reported to Council in June 2025.</p> <p><b>Complete</b> - Amendment 9 to the RLEP 2021 was gazetted on 1 September 2023 and required properties developed within the Housing Investigate Areas to provide an affordable housing contribution rate of 3% or 5% depending on the property's location.</p> <p>In addition, the draft Randwick Junction Town Centre Planning Proposals proposes an affordable housing contribution rate ranging from 2% to 9% depending on the property's location.</p>
	4.3 Seek an exclusion to the State Environmental Planning Policy (Affordable Rental Housing) 2009 and identify local housing solutions.	Action no longer required as new Housing SEPP introduced.
	4.4 Advocate for a new standard instrument definition for student housing and investigate appropriate development standards for student housing in the LEP 2012 review	<b>Complete</b> – The definition of co-living (student housing) was formalised in the NSW planning system in November 2021 with the introduction of the State Environmental Planning Policy (Housing) 2021. The Policy established co-living housing as a distinct category, setting out specific requirements for its development. To complement this, Council is currently investigating draft controls to be proposed that are to be included as a part of the review of RDCP 2013.

Randwick City Housing Strategy		
	4.5 Ensure housing opportunities for low income and key workers to support the Randwick Collaboration Area	<b>Complete</b> – See 4.2. Properties that require an affordable housing contribution with the Housing Investigation Areas and Randwick Junction Town Centre are located within the Randwick Collaboration Area.
	4.6 Work with Waverley and Woollahra Councils to prepare a regional approach to affordable housing	<b>Complete</b> – In 2022, Council commenced a joint regional affordable housing project with Waverley and Woollahra Councils however the project was discontinued by challenges associated with the project.
<b>7. Ensure future redevelopment sites are aligned with future transport investment</b>	7.1 Ensure an increase of social and affordable housing in any future redevelopment of social housing estates in the City	<b>Underway and ongoing</b> – See section 5.2 Social housing numbers of this Strategy.
	7.2 Work with the Land and Housing Corporation to develop a staged approach for the renewal of social housing estates	<b>Underway and ongoing</b> – See section 5.2 Social housing numbers of this Strategy.

Local Strategic Planning Statement Randwick City Council Vision 2040		
Relevant Planning Priority	Relevant Action	Response
1. Provide diverse housing options close to employment, services and facilities	<p>1.1 Finalise the Housing Strategy</p> <ul style="list-style-type: none"> <li>- inform the review of planning controls to deliver the 6-10 year housing target of 4,300 new dwellings by 2026</li> <li>- investigate affordable housing contributions scheme in areas identified for housing growth;</li> </ul>	<p><b>Complete</b> – The Housing Strategy was endorsed by the Department of Planning, Industry and Environment in 2021.</p> <p>Consistent with the Strategy, opportunities for dwelling growth have been introduced for dual occupancy development, Kensington and Kingsford Town Centres and in the 5 Housing Investigation Areas which will require an affordable housing contribution ranging from 3 to 5% depending on the property's location.</p>
	<p>1.2 Work with the Department of Planning, Industry and Environment to seek an exclusion for Randwick City LGA from the provisions of the Affordable Rental Housing SEPP and develop a local response to the provision of boarding houses</p>	<p><b>Complete:</b> The definition of co-living (student housing) was formalised in the NSW planning system in November 2021 with the introduction of the State Environmental Planning Policy (Housing) 2021. The Policy established co-living housing as a new category distinguishing this from boarding houses and setting out specific requirements for its development. The floor space incentives for the development of Co-living was reduced to 10%.</p>
	<p>1.3 Work with the Department of Planning, Industry and Environment to introduce a new land use term for student housing and incorporate local planning provisions for student and short term visitor accommodation.</p>	<p><b>Complete</b> – The definition of co-living (student housing) was formalised in the NSW planning system in November 2021 with the introduction of the State Environmental Planning Policy (Housing) 2021. The policy established co-living housing as a distinct category, setting out specific requirements for its development. To complement this, Council is currently finalising draft controls to be proposed that are to</p>

Local Strategic Planning Statement Randwick City Council Vision 2040		
		be included as a part of the review of RDCP 2013.  <b>Underway</b> - In 2022, the Randwick Comprehensive LEP Planning Proposal sought to limit the number of days per year for non-hosted short term rental accommodation to 90 days, however the initiative was not supported by the Department of Planning and Environment. Council has continued to advocate for better policy outcomes that promote a local approach to short term rental accommodation.
	1.4 Work with Land and Housing Corporation on a staged approach to the renewal of the social housing estates	<b>Underway and ongoing</b> – See section 5.2 Social housing numbers of this Strategy.
<b>2. Increase the supply of affordable rental housing stock to retain and strengthen our local community.</b>	2.1 Review and update the Randwick Affordable Housing Strategy and Action Plan  2.2 Prepare affordable rental housing contributions schemes for specific areas as identified in the Housing Strategy	<b>Underway</b> – draft strategy prepared, consultation to occur in mid-2025.  <b>Complete</b> - Amendment 9 to the RLEP 2021 was gazetted on 1 September 2023 and required properties developed within the Housing Investigate Areas to provide an affordable housing contribution rate of 3% or 5% depending on the property's location.
	2.3 Work with Waverley and Woollahra Councils to ensure a regional approach to affordable housing	<b>Complete</b> – In 2022, Council commenced a joint regional affordable housing project with Waverley and Woollahra Councils however the project was discontinued by challenges associated with the project.
	2.4 Work with community housing providers to deliver more affordable housing	<b>Underway</b> - Council currently owns affordable housing dwellings managed by community housing providers.
<b>23. A collaborative approach to guide and manage future</b>	23.2 Work with adjoining and nearby Councils to prepare a regional approach to affordable housing, coastal management,	<b>Complete</b> – in 2022, Council commenced a joint regional affordable housing project with Waverley and Woollahra Councils

Local Strategic Planning Statement Randwick City Council Vision 2040		
growth in Randwick City	open space and recreation, active transport and city resilience	however the project was discontinued by challenges associated with the project.

## Appendix Two

Randwick City Decision Making Matrix		
Criteria	Criteria weighting	Sub-criteria
Location	10%	Walking distance to employment hub
		Quality of local services
Public transport	22%	Walking distance to public transport
		Type of public transport options
		Destination options
		Frequency of services
Development parameters	28%	Car parking requirements
		Complexity of construction
		Initial estimated achieved floor space ratio
		Initial estimated dwelling yield
Existing site conditions	20%	Demolition of structures required
		Significant landscaping
		Relocation of existing use
Delivery timing	20%	Reclassification of land
		Required stakeholders
		Impact of RCC projects
		Strategic planning framework

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CITY PLANNING

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# Affordable Housing Design Guidelines



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Adoption Date:  
Click or tap to enter a date.

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Review Date:  
02 June 2025

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Version:  
Draft

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Responsible Department:  
City Planning

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TRIM Document Number:  
D05734058



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## 1. Introduction

### 1.1. Purpose

The purpose of the affordable housing design requirements is to assist developers and Council in the assessment and allocation of affordable housing dwellings to be dedicated to Council in accordance with the Randwick City Council Affordable Housing Strategy and Scheme.

Specifically, this Guide:

- Outlines the design requirements for affordable rental dwellings that have been dedicated as affordable housing dwellings on sites or as an 'in kind' contribution.
- Seeks to ensure that dedicated affordable housing dwellings are functionally equivalent, or greater than, market-rate dwellings that are within the same development in terms of amenity, facilities and design.
- This document seeks to further clarify requirements in the NSW Government's Apartment Design Guide (ADG) ensuring that its broad provisions are correctly applied to dedicated affordable housing units.

### 1.2. How to use this document

This design guide was publicly exhibited with the Randwick City Affordable Housing Strategy. It should be used to guide the design of proposed affordable housing dwellings that are to be dedicated to Council.

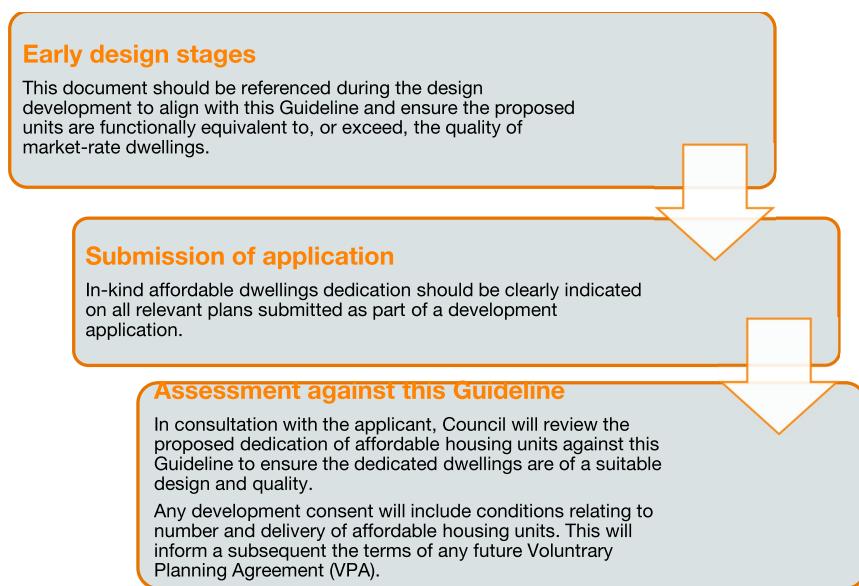


Figure 1. Affordable Housing Dedication Process

### 1.3. Land to which the design guidelines apply

The affordable housing design requirements apply to all dwellings that have been dedicated to Council for the purposes of affordable housing dwellings, provided through an 'in kind' contribution under any relevant adopted affordable housing contribution scheme within the Randwick City Local Government Area.

## 2. Design guidelines

### 2.1. Design requirements for affordable housing dwellings

Council will have regard to the following matters in considering an affordable housing dwelling offer:

#### ***Dwelling size, location and mix of accessible units***

##### Dwelling Size

- a. Each dwelling has a gross floor area (GFA) of at least 50m<sup>2</sup> measured in accordance with *Division 2 Affordable housing* of the Randwick LEP.
- b. For gross floor area dedications exceeding 50m<sup>2</sup>, the following minimum dwelling sizes apply:
  - i. 2 bedroom dwelling – 70m<sup>2</sup> (GFA)
  - ii. 3 bedroom dwelling – 90m<sup>2</sup> (GFA)

**Note** – Gross Floor Area is defined in Dictionary of the Randwick LEP and is measured within the internal walls of a dwelling, excluding car parking areas and any associated vehicular access along with basement storage areas. Dwellings to be dedicated to Council are to clearly demonstrate compliance with this Guideline in plans and documents submitted to Council as part of a Development Application.

##### Dwelling Mix & location

- c. Where more than one affordable housing dwelling is to be dedicated to Council:
  - i. The dwelling mix, defined by the number of bedrooms per unit, should align with Section C2 of Council's DCP.
  - ii. The dwellings are to be distributed throughout the building / development, including at least one dwelling above the ground floor level.
  - iii. A higher proportion of one-bedroom units may be appropriate in the Randwick Education and Health Precinct to meet the needs of essential workers.

##### Accessible and Adaptable dwellings

- d. Consideration should be given to the provision of adaptable/accessible units in accordance with the NSW Affordable Housing Ministerial Guidelines.

##### ***Design and amenity***

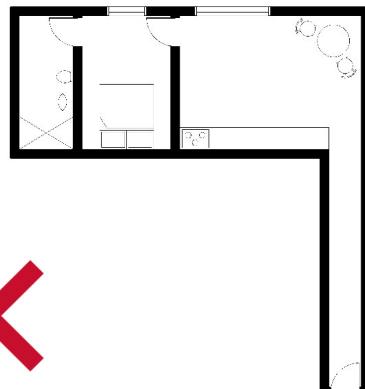
- e. The following design considerations are to be the same or greater than market rate dwellings within the development:
  - I. General layout and circulation: the layout and circulation should be considered practical and usable with minimal “dead space”. In the design of larger developments floor plates

often result in some spaces that are not considered usable space and what is commonly referred to as 'dead space'. An example of this would be an apartment with an excessively long hallway in lieu of sufficient habitable space as demonstrated in example 1 of Figure 2, Council will not accept dwellings that are considered to have excessive dead space or poor circulation.

- II. **Private open space**: private open space should meet the requirements under the ADG and/or relevant DCP as demonstrated in example 2 of figure 2.
- III. **Storage Space**: storage space is to meet the requirements under the ADG and and/or relevant DCP as demonstrated in example 2 of figure 2.
- IV. **Energy Efficiency**: All integrated appliances and mechanical heating and cooling should be of a high standard in terms of efficiency and be of the same standard as those provided throughout the development. For new apartments Council encourages 100% electric apartments to keep future running costs low for residents and to reduce health and safety impacts of managing units supplied with gas. Air conditioning should be provided unless the design allows for the dwelling to be adequately heated and cooled using passive and/or low-energy methods. Ceiling fans should be installed to provide a low-energy cooling option.
- V. **Thermal efficiency & Passive Design**: Council encourages high rating passive design in terms of thermal insulation, orientation and external shading. Affordable housing dwellings dedicated to Council should be of the same standard or greater than the market rate dwellings in the development. For example, if the development includes double glazing and high performance insulation to market rate dwellings, the dwellings dedicated for the purposes of affordable housing should also include the same insulation and double glazing.
- VI. **Water efficient dwellings**: all dwellings dedicated are to be fitted with water efficient fixtures including taps and showerheads.
- VII. **General Amenity**: Under the ADG, a specified percentage of dwellings must meet high amenity standards while allowing the remainder to have a lower level of amenity. To prevent dedications comprising solely of lower amenity dwellings—especially when dedicating more than one affordable housing unit to Council—the overall dedication must adhere to the amenity percentage standards detailed in the Apartment Design Guide as follows:
  - a. 60% or more of affordable housing dwellings dedicated to Council are to have good cross ventilation
  - b. a minimum of 70% of affordable housing dwellings dedicated to Council achieve adequate solar access; and
  - c. 20% of affordable housing dwellings dedicated to Council to incorporate the Liveable Housing Guideline's silver level universal design.

**Note** – Prior to dwellings being fitted out, the proponent is to provide to Council a materials schedule to ensure the fitout is of an acceptable level. This will be conditioned in the development consent which must be satisfied prior to the issue of an occupation certificate and to satisfy any voluntary planning agreement that may be in place for the development.

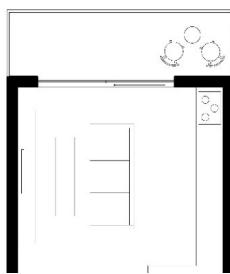
#### Examples of good and poor provision



**Example 1)** an apartment with an excessively long hallway that is not considered useable space. The general layout and circulation is poor, the bathroom can only be accessed via the bedroom.

There is no built-in storage in the bedroom or any private outdoor space, both are requirements under the ADG.

The apartment is also single aspect and south facing which would be considered poor in terms of solar access and cross ventilation.



**Example 2)** an apartment with a hallway with purpose, it is not excessively long and provides



separate access to the bedroom and bathroom as well as creating separation between the entry and living spaces.

The apartment includes built in storage in the bedroom and private outdoor space.

The apartment is also dual aspect East/West providing good solar access across the apartment and cross ventilation.

### ***Fit out of dwellings***

#### The same if not greater than market rate dwellings

1. Affordable housing dwellings must meet or exceed the quality of private dwellings and include durable and well-performing features. This means that the amenity level, storage provisions, and location within the development should be on par with or superior to market standards.

#### Provision of facilities

2. Each dwelling must feature a full-sized private kitchen and bathroom. Any dwelling larger than two bedrooms ( $>70m^2$ ) is to have a second bathroom. Council also requires the provision of a bathtub in family sized dwellings.

<b>Bathroom and Kitchens</b>	
1 bedroom	1 small bathroom (toilet, shower and sink)
	A full sized kitchen
2 bedrooms	1 full sized bathroom (shower/bathtub, toilet and sink)
	A full sized kitchen
3 bedrooms and greater	1 full sized bathroom (shower/bathtub, toilet and sink) & 1

	small bathroom (toilet, shower and sink)
	Full sized kitchen

### ***Parking Requirements and Security***

#### **Car, bicycle and motorcycle parking**

3. Any car parking provided is to be in line with the relevant DCP for the site or under the Housing SEPP.
4. Bicycle and motorcycle parking is to be compliant with Section B7 of Council's DCP.

#### **Secure Dwellings**

To ensure that all dwellings are safe and secure for residents, including those used for transitional housing, and to support the effective use of dedicated affordable housing units for this purpose when required, all new dwellings must incorporate robust security measures. In addition to the safety and security requirements outlined in Part C2 of the DCP, dwellings that are to be dedicated must also include:

- **Crime prevention through environmental design (CPTED):** Incorporate CPTED principles into the design.
- **Secure Entry Points:** Each unit must be fitted with high-quality locks on entry doors and windows.
- **Building Access Control:** All external access points to the building must be secured. The use of electronic access systems such as security fobs or similar technology is strongly encouraged.
- **Floor-Level Security:** In multi-storey buildings with lift access, each residential floor should be secured and accessible only to residents of that floor, where practicable.
- **Surveillance:** CCTV cameras must be installed in common areas, including building entry points, to enhance safety and deter unauthorized access. Incorporate passive surveillance in shared areas.

Security provisions must be clearly detailed in the development proposal, alongside the proposed dedication of affordable housing units and this must be submitted to Council prior to the drafting of any Voluntary Planning Agreement (VPA). These measures will be reviewed for adequacy prior to the settlement.

### 3. Design Guideline Checklist

Design Requirement Checklist for dwelling dedication	Yes/No
Does each dwelling meet size requirements?	
Are the dwellings to be dedicated as affordable housing clearly shown on submitted floor plans in the Development Application?	
Is the dwelling mix consistent with Section C2 of the DCP Please indicate mix.	
Is the location of the dwellings suitable? Briefly explain	
Is the layout and circulation acceptable? Briefly explain	
Are the dwellings (if apartments) ADG compliant?	
Is the energy performance of the dwellings the same or greater than other dwellings within the development?	
Is the thermal efficiency of the dwellings the same or greater than other dwellings within the development?	
Is the water efficiency of the dwellings the same or greater than other dwellings within the development?	
Are the aspects and outlooks of the dwelling considered acceptable within this guidance?	
Does the fit out of dwellings comply with this guidance?	

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## Appendix 3 - Key Stakeholder Submissions

### Summary of submissions with responses:

	Submissions summary and responses
1.	<p><b><u>Bridge Housing:</u></b> Support for the strategy in particular:</p> <ul style="list-style-type: none"> <li>• setting of rent for affordable housing owned by Council at 30% of household income</li> <li>• target of 1,494 new social or affordable housing dwellings</li> <li>• potential use of community housing providers for partnerships to deliver greater affordable housing programs</li> <li>• exploring increasing target overtime to meet full level of need</li> <li>• a preference for Council to prioritise monetary contributions to ensure dedicated units are financially sustainable in terms of strata costs and cost of individual units scattered across multiple developments.</li> <li>• monetary contributions allows for greater access to funding to deliver greater programs.</li> </ul> <p><b><i>Response to submission</i></b></p> <p>A higher target for affordable and social housing over time is noted and can be considered based on future housing trends. The preference for monetary contributions is also noted and a new action has been added to the Strategy to allow for flexibility for monetary contributions in lieu of in-kind dedication, on a case by case basis.</p>
2.	<p><b><u>The Junction Neighbourhood Centre:</u></b> Support for the strategy including the rental based on household income, increased diversity of housing stock, partnerships with CHPs and Co-ops. Further consideration of key worker definition and support for women escaping domestic and family violence or those that are more vulnerable.</p> <p><b><i>Response to submission</i></b></p> <p>Essential worker details to be considered in implementing actions in relation to essential workers including advocacy to state government.</p>
3.	<p><b><u>South Sydney Regional Organisation of Councils:</u></b> Support for the strategy and all the proposed actions including inclusionary zoning and a LGA wide contribution, increased housing diversity and advocacy commitments for improved state legislation and provision of affordable and social housing by the state government.</p> <p>Key suggestions:</p> <ul style="list-style-type: none"> <li>• A unified affordable housing scheme across the LGA that includes a low-broad based contribution;</li> <li>• Development of a distribution plan for quality affordable housing delivery, acquisition of existing stock and prioritising essential workers;</li> <li>• Further explore Council owned sites and partnerships with CHPs</li> <li>• Collaborate with other stakeholders for amendments to the Housing SEPP;</li> </ul>



Submissions summary and responses	
	<ul style="list-style-type: none"> <li>• Council policy for all affordable housing across the LGA be capped at 30% of household income.</li> </ul> <p><b>Response to submission</b></p> <p>A broad affordable housing scheme is included in the draft strategy. A 'distribution plan' approach will be considered in developing Council led affordable housing programs. The strategy's actions are to also consider partnerships with CHPs and in advocating for amendments to the Housing SEPP. The strategy has been amended in response to comments received during public exhibition to include an action to advocate to the NSW Government for all affordable housing (not just Council owned) to be capped at 30% of household income.</p>
4.	<p><b>Shelter NSW:</b> support for the strategy including:</p> <ul style="list-style-type: none"> <li>• inclusionary zoning schemes,</li> <li>• the target for social and affordable housing stock</li> <li>• Council led delivery using partnerships with CHPs</li> <li>• the recognition of affordable housing as critical infrastructure</li> <li>• affordable housing to be provided in perpetuity</li> <li>• income based rent setting models and</li> <li>• advocacy for tax reform.</li> </ul> <p>Further comments and concerns relating to current housing affordability issues including:</p> <ul style="list-style-type: none"> <li>• essential workers migrating to other regions;</li> <li>• If the NSW Government does reach the potential of their sites for social and affordable housing, Council may not achieve the targets within the strategy;</li> <li>• Affordable housing managed by for profit providers offering stock that is not affordable. Council to advocate for changes to the state legislation to require all affordable housing (including for profit providers) to be rented at 30% of household income.</li> <li>• A campaign for the renting out of spare bedrooms is unlikely to address the housing crisis. Efforts are best put towards policy reform to encourage downsizing and secondary dwellings.</li> <li>• Concerns around impacts of short term rental housing</li> </ul> <p><b>Response to submission</b></p> <p>The draft Strategy recognises that a lack of affordable housing can contribute to migration of essential workers to other regions. The concerns regarding a potential shortfall in the delivery of housing by Homes NSW is noted. It is also recognised that all levels of government have a responsibility to deliver affordable housing. Council will continue to advocate to the NSW Government for increased funding for affordable and social housing as specified in Action 3.2 of the Strategy. Amendments to the strategy include an action to further advocate for all affordable housing (not just Council owned) to be capped at 30% of household income.</p>
5.	<p><b>Dexus:</b> Supportive of the strategy and guidelines including the target of 1,494 new affordable and social dwellings</p> <p>Key comments and concerns include:</p> <ul style="list-style-type: none"> <li>• Feasibility of an affordable housing contribution of up to 10% - future planning proposals for such rates should be subject to economic testing;</li> <li>• preference for monetary contributions or greater flexibility in distribution of dwellings</li> <li>• Cash contributions rates to be indexed to CPI fluctuations – with phase in period for strategic rezonings to allow the market to adjust.</li> </ul>



Submissions summary and responses	
	<ul style="list-style-type: none"> <li>Include CHPs in the consultation process for advice on the design guidelines</li> <li>Units should be located with public transport and other services.</li> <li>Clarification to industry for economic measures and method of dedication with post-dedication responsibilities.</li> </ul> <p><b>Response to submission</b></p> <p>In relation to concerns about the feasibility of a 10% affordable housing levy on uplift, amendments to Action 1.1 have been made to remove this target. This action specifies that the maximum affordable housing rate will be determined on a case by case (and in sites or precincts) seeking a maximum levy on a site. Action 1.9 has been amended to allow flexibility for monetary contributions where appropriate, as this concern has been raised in other submissions. This will allow Council to consider the best outcome in relation to Council's Affordable Housing Program objectives.</p>
6.	<p><b>Homes NSW:</b> Homes NSW owns a number of sites in the Randwick LGA with significant opportunities for future social and affordable housing including keyworker housing.</p> <p>Homes NSW support:</p> <ul style="list-style-type: none"> <li>the Strategy's target of 10% GFA for affordable housing in uplift areas (subject to feasibility)</li> <li>investigation of an LGA-wide contribution scheme</li> <li>review of planning controls to encourage diverse housing types including secondary dwellings</li> <li>efforts to assess the impact of short-term rentals and redevelopment on low-cost housing</li> <li>strengthening provisions to prevent net dwelling loss</li> <li>prioritising Council-owned sites for affordable housing development</li> <li>exploring partnerships and joint ventures with Community Housing Providers.</li> </ul> <p>Comments and Issues raised included:</p> <ul style="list-style-type: none"> <li>Update references in the Draft Strategy to reflect Homes NSW as the umbrella organisation encompassing: <ul style="list-style-type: none"> <li>NSW Land and Housing Corporation (LAHC)</li> <li>Aboriginal Housing Office (AHO)</li> <li>Housing and homelessness functions of the Department of Communities and Justice (DCJ)</li> <li>Key worker housing functions across government</li> </ul> </li> <li>Update references in the draft strategy to clarify that the NSW Affordable Housing Ministerial Guidelines caps rent at 74.9% of market rent only for Not-for-profit Community Housing Providers (CHPs) to maintain charitable status, whilst For-profit CHPs may charge up to 80% of market rent, as permitted under the Housing SEPP and National Rental Affordability Scheme (NRAS), noting that under fee-for-service arrangements (e.g. NRAS), rent is typically set at 80% of market rate.</li> <li>NSW Affordable Housing Ministerial Guidelines are currently under review, with rent setting mechanisms being a key focus.</li> <li>Note that: <ul style="list-style-type: none"> <li>Affordable housing is typically delivered through a mix of funding and land contributions from all levels of government, with not-for-profit Community Housing Providers (CHPs) playing a key role, often without relying on planning mechanisms.</li> <li>Transferring ownership of affordable housing to not-for-profit CHPs can significantly boost delivery—by an estimated 21–27%—as they can leverage assets to secure additional funding.</li> <li>Some Councils are finding it expensive to retain ownership of affordable housing stock.</li> </ul> </li> </ul>



Submissions summary and responses	
	<ul style="list-style-type: none"> <li>NSW Government is investing in build-to-rent developments for essential workers and is improving data capturing and sharing.</li> <li>Homes NSW welcomes collaboration and offers assistance for delivery of Council programs.</li> </ul>
	<p><b>Response to submission</b></p> <p>The strategy has been amended with correct references to organisations and to clarify rent capping under the Ministerial Guidelines. To further collaborate with Homes NSW on future programs and consider other suggestions.</p>
7.	<p><b>Nightingale Housing:</b> Whilst not as experienced in the NSW Planning system, it is noted that:</p> <ul style="list-style-type: none"> <li>Support for 'Inclusionary Zoning' as your first priority and believe that it could be grandfathered in over time.</li> <li>Is there potential for incentives for renting out under-utilised bedrooms in homes, doing more than just a public awareness campaign.</li> <li>Industry: Council could work with not-for-profit developers or other agencies to look at Ground Lease Models on Council Owned Land</li> </ul>
	<p><b>Response to submission</b></p> <p>Support noted and to consider future opportunities with non-for profit developers and other agencies and different models in the implementation of the strategy.</p>
8.	<p><b>The Women's Housing Company:</b> The Women's Housing Company has reviewed the strategy. It addresses the urgent need for additional affordable housing in the Eastern Suburbs.</p> <p>Some further challenges are:</p> <ul style="list-style-type: none"> <li>Diverse income needs: Households with very low, low, and moderate incomes are all experiencing significant housing stress in the eastern suburbs due to escalating rental prices and limited affordable supply.</li> <li>Broader impact: The shortage of affordable rental housing affects not only vulnerable groups but also essential workers and long-term residents, many of whom are being priced out of the area.</li> <li>Affordability gap: Even when rents are capped at ceiling rates (74.9%), they often remain unaffordable for low-income earners, limiting the effectiveness of such measures.</li> <li>Barriers to tenant placement: Community housing providers face difficulties in securing eligible tenants due to restrictions on using mainstream platforms like realestate.com.au and Domain, as we are not licensed real estate agents. This limits our ability to advertise available properties effectively.</li> </ul>
	<p><b>Response to submission</b></p> <p>The challenges raised are noted and will be considered in the implementation of the strategy.</p>
9.	<p><b>The Deli Women and Children's Centre:</b> The Deli Women and Children's Centre highlights the critical link between domestic and family violence and homelessness, advocating for increased access to transitional and affordable housing as a vital pathway to safety and recovery for women and children facing compounding barriers in Randwick.</p> <p>The submission supports use of planning mechanisms and Council led programs to deliver more affordable housing, particularly for women and children escaping domestic and family violence (DFV). The development of Design Guidelines is also commended.</p> <p>Key considerations and comments:</p>



Submissions summary and responses	
	<ul style="list-style-type: none"> <li>• Prioritise transitional and crisis housing for DFV victim-survivors.</li> <li>• Allocate housing in new developments to DFV-specialist or community housing providers.</li> <li>• Retain existing low-cost rentals to prevent displacement.</li> <li>• Embed trauma-informed, safety-focused design in Council-led housing.</li> <li>• Simplify application processes to reduce barriers for women leaving violence.</li> <li>• Advocate for DFV-inclusive housing policies and funding at state and federal levels.</li> <li>• Partner with DFV services for tenancy support and governance input.</li> <li>• Strengthen design guidelines to ensure safety, privacy, accessibility, and healing environments.</li> <li>• Future collaboration with Council for lasting solutions.</li> </ul>
10.	<p><b>Response to submission</b></p> <p>These comments regarding challenges in the implementation of the strategy are noted and will be considered in the development of Affordable and Transitional Housing Guidelines or Design Guidelines.</p> <p><b>Community Housing Industry Association NSW (CHIA NSW):</b> CHIA commends and broadly supports Council's comprehensive strategy and welcomes Council's commitment for more affordable rental housing, noting that a lack of subsidy remains the key barrier to delivery. There is support for the dwelling target as a starting point, inclusionary zoning measures, Council led affordable housing programs leveraging Council land and partnerships with housing providers and Homes NSW for delivery of new homes, essential worker housing, the implementation of design guidelines and the proposed advocacy efforts.</p> <p>Key comments and considerations include:</p> <ul style="list-style-type: none"> <li>• Supports the affordable housing target of 7.5% as a starting point, however recommends a more ambitious target to be considered. The target of 1,494 social or affordable dwellings does not address the current shortfall of 3,355 homes (to be 5,300 by 2041). A target that separates social and affordable dwellings is also recommended.</li> <li>• Notes that the affordable housing spectrum is much broader than indicated in the strategy</li> <li>• Recommends essential worker housing eligibility be based on income thresholds rather than job type, to ensure fair access and secure housing for all low-income households including people escaping family and domestic violence, young people, and low waged workers who do not meet a given definition of essential worker.</li> <li>• Reconsider preferences for in-kind dedication of affordable housing due to the management costs (higher strata fees etc.) and due to missed opportunities for funding available to CHPs for the construction of new dwellings, should partnerships be used.</li> <li>• To consider applying inclusionary zoning to commercial developments that generate housing need (like other Councils) and to investigate applying higher rates to student accommodation to off-set their impacts on the housing market.</li> <li>• Consider a contribution rate that escalates over time.</li> <li>• Consider further planning incentives for affordable housing including reduced parking rates, flexibility of design standards and land use permissibility such as City of Sydney that permits residential uses on employment land where 100% affordable is proposed.</li> <li>• Design guides to consider early engagement with CHPs, dwelling mix requirements that are flexible based on needs and to reconsider distribution of dwellings as clustering in larger projects (allows for stratum subdivision and streamlined management) and reduce parking rates in accessible locations.</li> <li>• To consider discounted fees and charges for CHPs.</li> <li>• Consideration of land transfer to CHPs for affordable housing.</li> <li>• To implement key performance indicators with specific team or officer to monitor.</li> </ul> <p><b>Response to submission</b></p> <p>The need for a greater provision of affordable and social housing beyond the target within the strategy is noted for future considerations where the ability to provide further housing increases either through state or local initiatives. The preferences for monetary contributions due to the complexities, costs and lack of funding opportunities is also noted for consideration.</p>



Submissions summary and responses	
11.	<p><b>Urban Taskforce Australia:</b> acknowledges the need for affordable housing schemes to address rental stress for many in the community and the role developers can play, however believes collaboration with developers and incentives are the most effective.</p> <p>Concerns and comments:</p> <ul style="list-style-type: none"> <li>• The view that affordable housing schemes are a “tax on development” with developers as a convenient source of revenue.</li> <li>• The view that Councils and consultants are not best placed to determine project viability.</li> <li>• The view that housing affordability is impacted by poor planning and restrictions and charges on development.</li> <li>• Concerns that obtaining finance could be impacted.</li> <li>• Concerns that the shortfall of supply of housing to meet demand will worsen.</li> <li>• Recommends incentives over levies with Germany actively facilitating development to increase tax base – if affordable units are to be provided there should be more incentives for developers to do so. In-fill Affordable Housing Bonus scheme offers higher incentives as developers retain the dwellings and get planning bonuses.</li> <li>• Understanding the 7.5% target for social and affordable dwellings looks at several pathways to achieve this.</li> <li>• A 10% blanket affordable housing contribution on all new GFS is unrealistic with the LGA's housing issues having no bearing on feasibility and the cost will be borne by owner occupiers buying into the developments.</li> <li>• With too many levies developers will look elsewhere to deliver housing.</li> <li>• Encourages Council to work with the development industry in developing inclusionary zoning.</li> <li>• There needs to room for economic growth in the industry.</li> <li>• Issues with total GFA of project being levied rather than uplift</li> <li>• Council will not meet the required number of dwellings to achieve 1,494 affordable and social dwellings</li> <li>• Lack of detail on proposed contribution rates.</li> </ul> <p><b>Response to submission</b></p> <p>Concerns around viability are noted in relation to affordable housing contributions being a ‘tax on development’ and not offering incentives. In response, it is important to reiterate that affordable housing levies are only applied to sites subject to uplift. This uplift usually results in a significant increase in value and development potential to any particular site. Therefore, applying a levy in such cases provides fairness and ensures that the private benefits of uplift are shared with the community.</p> <p>The suggestion that local councils and economic consultants are unqualified to assess site feasibility is not supported. Council seeks independent detailed feasibility assessment for all planning reviews. Concerns regarding overall feasibility and the impact on financing have been carefully considered in reviewing the Strategy’s actions. In response to this and other feedback received, officers have recommended removing specific 10% target. This will allow affordable housing levies to be applied on a site or precinct basis, allowing for greater flexibility and responsiveness to local planning and market conditions.</p> <p>Applying levies on a site or precinct basis allows for a more equitable and context sensitive approach. This recognises that some sites may yield affordable housing contributions well below the proposed target, while others particularly those benefiting from greater planning uplift and development yield, could generate substantially higher contributions. All levies will be subject to rigorous feasibility testing as part of the planning proposal process.</p> <p>Housing targets comments are noted. The strategy has taken a comprehensive approach to delivery of affordable housing recognising that all levels of government and the development industry play a role in its delivery.</p> <p>12. <b>St George Community Housing:</b> St George Community Housing is supportive of the strategy and the potential positive improvements to housing affordability as a result of its adoption and</p>



Submissions summary and responses	
	<p>implementation. Support is given for most actions including inclusionary zoning, council led programs and advocacy efforts to address issues at a state and federal level. Whilst the submission does not oppose 1.4 Action, it highlights this action as less effective than other actions.</p> <p>Key comments include:</p> <ul style="list-style-type: none"> <li>• Increasing inclusionary zoning target to 15-20%.</li> <li>• Support for housing diversity including secondary dwellings.</li> <li>• Strong support for addressing the impacts of STRA including the development of a discussion paper as indicated throughout the submission.</li> <li>• Strong support for affordable housing on Council owned sites to be done in partnership with CHPs.</li> <li>• Highlights the significant shortfall in current social housing provision.</li> <li>• Strong support for a review of co-living developments that are resulting a premium product.</li> <li>• Support for the review of tenancy arrangements and guidelines.</li> </ul> <p><b>Response to submission</b></p> <p>The recommendation of a 15-20% target is noted. Council's recent independent feasibility modelling assessments on a variety of sites within Randwick Junction (undertaken to support the introduction of affordable housing levies under the Planning Proposal) demonstrates feasibility over 9% can only be achieved on one site. In response to feedback, the proposed affordable housing target of 10% has been removed from the draft Strategy and instead the action has been reworded to require precinct detailed feasibility testing on a site-by-site basis where sites are proposed for uplift. This provides a 'balanced and fair' approach, noting that affordable housing levies can vary.</p> <p>Concerns raised that non-hosted STRA and student housing developments impact the supply of affordable and low-cost housing are noted. Research and data analysis will be undertaken as part of the implementation of the actions to investigate the impacts locally.</p>
<b>13.</b>	<p><b>City of Sydney:</b></p> <p>The City of Sydney strongly supports the strategy and encourages the implementation. Support is specifically noted for:</p> <ul style="list-style-type: none"> <li>• The inclusion of a target as this increases the effectiveness of the strategy.</li> <li>• Capping affordable housing rents at 30% of household income.</li> <li>• The use of partnerships for the delivery of affordable housing programs, particularly with community housing providers as they can access funding and leverage existing assets to fund the delivery of additional affordable housing.</li> </ul> <p>Other comments included:</p> <ul style="list-style-type: none"> <li>• Consider agreements to distribute funding or transfer of land to community housing provider with legal security arrangements to ensure the land its used as affordable housing in perpetuity.</li> <li>• When acquiring existing stock the financial sustainability of the affordable housing program must be considered for both Council and the community housing provider.</li> <li>• Further opportunities to discuss and collaborate with the City of Sydney are welcomed.</li> </ul> <p><b>Response to submission</b></p> <p>The City of Sydney's support is appreciated and as key players in the affordable housing space assists further validates the approaches in the strategy. The strategy has the flexibility to further consider the submissions points on delivery through partnerships including the transfer of land to community housing providers with tight legal security arrangement.</p>



**Submissions summary and responses**

Council also finds the point in relation to financial sustainability of acquiring existing stock helpful for consideration in the implementation of the strategy and will seek to discuss this and the points above with City of Sydney staff in the process of implementing the strategy.



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## Appendix 4 – Community Submissions

### Background:

1.	<p>Support for the strategy. As a long term resident of Maroubra, the Strategy is timely.</p> <p><b>Response to submission</b></p> <p>Support noted.</p>
2.	<p>Concerns about the consequences of the policy including stricter requirements for private developments may impact overall supply as developers may leave sites empty especially when linked to uplift.</p> <p><b>Response to submission</b></p> <p>Policy intervention is necessary to provide developers with feasible incentives and to clarify expectations and requirements to deliver affordable housing. Council's Affordable Housing Strategy supports the application of affordable housing levies in Kensington and Kingsford town centres and existing HIAs, as well as in the draft Randwick Junction Planning Proposal, all of which have been subject to independent feasibility testing.</p>
3.	<p>Five-year tenancies are not long or secure enough for many people with no further provisions or security for older people.</p> <p><b>Response to submission</b></p> <p>Noted for consideration in the preparation of Council's Affordable and Transitional Guidelines.</p>
4.	<p>General support for the strategy, but affordable housing development on Council land must consider competing uses for the overall community. Strong support for addressing the impacts of short term rental accommodation (STRA).</p> <p><b>Response to submission</b></p> <p>Any development of Council land will be subject to comprehensive land use planning and due diligence processes. These processes will encompass broader considerations of community needs and appropriate land uses. Concerns regarding STRA are noted and a new Action 1.6 of the draft strategy is to investigate the impacts of short term rentals across the Randwick LGA.</p>
5.	<p>Support for the strategy, but existing issues such as online STRA platforms such as Airbnb should be addressed.</p> <p><b>Response to submission</b></p> <p>Concerns regarding STRA are noted and a new Action 1.6 of the draft strategy is to investigate the impacts of short term rentals across the Randwick LGA.</p>
6.	<p>Support for the provision of affordable housing, but not for large scale high-density and population increases due to demand on infrastructure and services.</p>



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	<p><b>Response to submission</b></p> <p>Council's Affordable Housing Strategy supports the application of affordable housing levies in planned uplift areas within Randwick City, namely, the Kensington and Kingsford town centres, existing Housing Investigation Areas, and the draft Randwick Junction Planning Proposal - all of which have undergone feasibility testing. State government housing reforms within Randwick City allow for higher density development. The draft Strategy aims to maximise affordable housing contributions from all uplift areas. Council will continue to review infrastructure needs through regular reviews of Council's operational plans and delivery programs.</p>
7.	<p>Support for the Strategy</p> <p><b>Response to submission</b></p> <p>Noted.</p>
8.	<p>Object to the strategy with the perception that low-socio economic individuals are "undesirable" and "participate in crime" and offer no value to the area, compared to the contribution of teachers, police, nurses.</p> <p><b>Response to submission</b></p> <p>The eligibility criteria for accessing affordable housing includes for a tenant to be employed and earning an annual income generally between \$36,000 up to \$86,400 (for a single adult with no dependants). Many teachers, police, nurses will fall into this category. The draft strategy has actions to support essential workers to be included in affordable housing.</p>
9.	<p>Object to the strategy as it is not a core function of Council but a market or state government role.</p> <p><b>Response to submission</b></p> <p>Local government plays an important role in enabling housing diversity through planning tools and processes. The draft Strategy aims to ensure that essential workers and those facing housing stress can continue to live and work in Randwick City. It seeks practical actions to address a growing challenge. Lack of affordable housing can have implications for economic productivity, social cohesion, and access to jobs and services. By supporting affordable housing, Council is helping to maintain a diverse and resilient community.</p>
10.	<p>Support for the prioritisation of essential workers.</p> <p><b>Response to submission</b></p> <p>The Draft Strategy includes the following actions to support essential worker housing in the LGA:</p> <ul style="list-style-type: none"> <li>• Action 1.6 investigates the impacts of short term rentals across the Randwick LGA and the loss of traditional low-cost and affordable dwellings through the redevelopment of sites to understand the impacts on housing affordability and essential worker housing provision.</li> <li>• Action 3.3 advocates for essential/key worker housing that is affordable to be delivered as essential infrastructure to support large scale non-residential redevelopment on government land or in proximity to transport infrastructure</li> <li>• Action 3.5 advocates to the NSW Government through the planning system to require affordable dwellings within all Co-Living developments to provide for students and essential workers.</li> </ul> <p>Additionally, amendments to the Draft Strategy have been made to incorporate the findings of the "Options for essential worker housing in New South Wales" Parliamentary Inquiry 2025.</p>



11.	<p>Support for the strategy but would like to see actions that detail key stakeholder and landholders in the LGA. The strategy should also consider improved data and reporting on vacant Residential Flat Buildings with penalties applied.</p> <p><b>Response to submission</b></p> <p>The views of key stakeholders and landholders will be considered in the delivery of affordable housing. This is intended to be addressed during the implementation phase rather than detailed within the strategy itself, as outlined in Actions 2.1 and 2.2. In response to concerns regarding vacant residential flat buildings, Council has introduced a new Action 3.6 to address the impacts of vacant homes and explore mechanisms for improved data collection and potential regulatory responses.</p>
12.	<p>Support for the strategy, however the distinction between social and public housing needs to be included. Councils target of 7.5% of all dwellings to be social or affordable by 2036 may not be achievable if affordable housing dwellings are not capped at 30% of housing income. Target is also not in the front of the document. Council should consider prioritising access for very-low and low income households for Council owned affordable housing as moderate income households have access to ongoing developer-provided affordable housing.</p> <p><b>Response to submission</b></p> <p>The draft strategy has been updated to clarify the distinction between social and affordable housing and 'public housing'. To clarify, social housing supports people on very-low income or those receiving income support, whereas affordable housing managed by Community Housing Providers (CHPs), caters for low to moderate income households.</p> <p>Council acknowledges that the 7.5% target for social and affordable housing by 2036 may be an aspirational target. Council is committed ongoing planning initiatives, other actions and advocacy as outlined in the draft strategy to achieve progress in increasing the supply of affordable housing. This will be achieved, among other things, by annual monitoring of affordable housing trends and data and through the implementation of the actions of the draft strategy. In response to feedback, a new Action 3.7 has been added to advocate for changes to Ministerial Guidelines to ensure all affordable housing - particularly that delivered under state planning policies - is capped at 30% of household income.</p>
13.	<p>General support with further comments suggesting a penalty for vacant homes, need to address the competing land use issues posed by large scale student housing versus affordable residential development and the impacts of STRA with penalties for STRA to be considered.</p> <p><b>Response to submission</b></p> <p>The strategy includes new Action 3.6 to address the impacts of vacant dwellings and explore mechanisms for improved data collection and potential regulatory responses. Similarly, the strategy acknowledges the significant growth of student accommodation in areas close to the university and hospital. It seeks to address these competing priorities through future planning and implementation. The draft strategy includes the following relevant actions:</p> <ul style="list-style-type: none"> <li>• Action 1.6 investigate the impacts of short term rentals across the Randwick LGA and the loss of traditional low-cost and affordable dwellings through the redevelopment of sites to understand the impacts on housing affordability and essential worker housing provision.</li> <li>• Action 3.5 advocates to the NSW Government through the planning system to require affordable dwellings within all Co-Living developments to provide for students and essential workers.</li> </ul>
14	Impact of vacant properties during a rental crisis should be addressed.



	<p><b>Response to submission</b></p> <p>Noted - Council has introduced a new Action 3.6 to address the impacts of vacant homes and explore mechanisms for improved data collection and potential regulatory responses.</p>
15	<p>Concerns raised around having to work past retirement age to afford rent.</p> <p><b>Response to submission</b></p> <p>The draft strategy recognises that increasing rents places financial pressure on households. Accordingly, the draft strategy is focussed on accelerating supply of affordable and social housing and incorporates a target and implementation plan which in turn eases pressure on rents.</p>

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## Motion Pursuant to Notice No. NM106/25

**Subject: Notice of Motion from Cr Willington - Festive decorations - measures to limit the damage to the environment and wildlife**

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### **Motion:**

That Council:

- a) notes and applauds the recent messaging from Council urging the community to consider using sustainable Halloween decorations to reduce the impact on the environment and harm to wildlife; and
- b) requires Council staff to include sustainability messaging in communications at times of festivity, when residents are decorating their homes and gardens, thereby encouraging Randwick residents to reduce waste and risks to wildlife.

### **Background:**

Synthetic decorations such as fake spider webs and fake snow pose a risk to wildlife when spread around fences and bushes. Christmas lights and synthetic Christmas trees place a burden on the environment and take hundreds of years to break down in landfill. These products eventually become microplastics polluting the environment.

The recent messaging from Council sent a clear message:

*If you're spooking up your garden with decorations this year, consider the impact they might have on the environment and animals and whether the decorations can be reused.*

*Halloween coincides with breeding and nesting seasons, and decorations such as synthetic spiderwebs, for example, can entangle small animals such as birds, lizards and insects, leading to serious injury. We suggest decorating the inside of your windows instead of your verandah, porch or garden, and use natural materials and reusable decorations where possible*

This motion expresses support for the recent Halloween message and seeks to ensure that sustainability and protection of Randwick's wildlife are included in Council communications at times of festivity when residents are decorating their homes and gardens.

### **Attachment/s:**

Nil

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**Submitted by:** Councillor Willington, North Ward

**File Reference:** F2012/00347

NM106/25



## Question with Notice No. QN13/25

**Subject: Question with Notice from Cr Rosenfeld - Broadarrow Reserve Overflow Parking**

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**Question:**

With regards to Broadarrow Reserve overflow parking what criteria needs to be met for an event to be determined 'major' and would trigger the allowance of this overflow parking.

**Response from Director City Services:**

Council has nominated major events, examples such as the Nutri-Grain IronMan and IronWoman Series, Beach Breaks Festival, and other significant events under its Open Space booking process.

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**Submitted by:** Councillor Rosenfeld, Central Ward

**File Reference:** F2023/00481

QN13/25