

11 February 2016

Codes and Approval Pathways
Department of Planning and Environment
Submitted online at: codes@planning.nsw.gov.au



Expanding Complying Development

Thank you for the opportunity to comment on the proposal to expand complying development. The NSW Council of Social Service (NCOSS) believes this an opportunity to reinforce the importance of universal design and affordable housing.

Universal Design

Universal design principles ensure that dwellings can easily accommodate people with mobility limitations, including older people and people with disability. The National Disability Strategy commits to the provision of an agreed “universal design standard” in all new housing by 2020.¹This standard is understood to be the Livable Housing Design guideline, Silver level.²

In line with these developments, NCOSS recommends that to be complying, a development should satisfy at least the silver standard of the Livable Housing Design guideline. This would be an improvement on current voluntary codes of practice and ensure that the dwelling was ‘liveable’ for all members of the community.

Affordable housing

We know that housing affordability is a significant and growing problem. As National Shelter noted in their 2015 Rental Affordability Index Report, the average household in Greater Sydney is paying 28% of household income on rent, placing them perilously close to the rental stress threshold, which is 30% or more of a low-income household’s expenses.³

NCOSS commends the NSW Government’s leadership in establishing the Social and Affordable Housing Fund. Whole of Government action is needed on this issue, and planning guidelines are a crucial lever for change. Accordingly, we recommend that to be complying, any lot with more than 5 dwellings should require at least 1/3 of the dwellings to be set aside as affordable housing.

Should you require further information, please contact John Mikelsons, NCOSS Deputy CEO, on 8960 7916 or via email at john@ncoss.org.au.

Yours sincerely

A handwritten signature in black ink that reads 'Tracy Howe'. The signature is written in a cursive style with a large, stylized 'T' and 'H'.

Tracy Howe
Chief Executive Officer

¹ Council of Australian Governments, 2011, [2010–2020 National Disability Strategy](#)

² Liveable Housing Australia, 2012 [Liveable Housing Design Guidelines](#).

³ Community Sector Banking, Shelter Australia and SGS Economics & Planning, November 2015, [Rental Affordability Index](#).