

NSW Nurses and Midwives' Association

Amendment to
State
Environmental
Planning Policy
No 70 –
Affordable
Housing (Revised
Schemes)

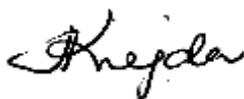
Submission 31 January 2018

The New South Wales Nurses and Midwives' Association (NSWNMA) is the registered union for all nurses and midwives in New South Wales. The membership of the NSWNMA comprises all those who perform nursing and midwifery work. This includes assistants in nursing and assistants in midwifery (who are unregulated), enrolled nurses, registered nurses and midwives at all levels including management and education.

The NSWNMA has over 65,000 members and is affiliated to Unions NSW and the Australian Council of Trade Unions (ACTU). Eligible members of the NSWNMA are also deemed to be members of the New South Wales Branch of the Australian Nursing and Midwifery Federation.

Our role is to protect and advance the interests of nurses and midwives and the nursing and midwifery professions. We are also committed to improving standards of patient care and the quality of services in health and aged care services.

We welcome the opportunity to make this brief submission to NSW Government in response to the Draft Affordable Housing SEPP 70 review. We wish to acknowledge the contributions made by our members in preparing our comments. This submission is authorised by the elected officers of the New South Wales Nurses and Midwives' Association.



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Background

The NSW Government is currently exhibiting an Explanation of Intended Effect (EIE). The EIE has been prepared to discuss the intended effect of an amendment to State Environmental Planning Policy No 70 – Affordable Housing (Revised Schemes) (SEPP 70). The proposal will expand the SEPP 70 so that it applies to five (5) new councils:

- Randwick City
- Inner West
- Northern Beaches
- City of Ryde
- City of Canada Bay

The NSWNMA welcomes the opportunity to provide a brief comment on the proposed changes to SEPP 70.

Introduction

Endorsed at the NSWNMA Annual Conference in 2016, the NSWNMA has adopted the position that public policy and planning must address the need for affordable housing for all essential workers. Workers that are employed in key service areas, such as nurses and midwives, should be able to rent or purchase housing that is suitable for their needs, secure and priced so that they can meet other living expenses¹. NSWNMA has been advocating for our members in a range of settings to call for increases in affordable rental housing. We support the proposed inclusion of five additional councils in State Environmental Planning Policy no. 70.

¹ NSW Nurses and Midwives' Association 2016, *Position Statement on Affordable Housing*, Waterloo, NSW.

Affordable Housing

The limited availability of appropriate housing, particularly affordable rental housing that is located within reasonable proximity to workplaces is a significant problem facing many of our members. This lack of affordable housing has very real impacts on the ability of nurses and midwives to be available to deliver healthcare. In March 2017, our members responded to a short survey focused on housing. The significant responses indicated that many of our members are experiencing difficulty securing affordable housing close to their workplaces. 36 % stated that they have changed jobs and relocated as a result of housing affordability and almost 50% indicated that they are prepared to change jobs to live in a more affordable area.

The NSWNMA considers it to be in the best interest of society to ensure nurses and midwives are available to provide nursing and midwifery care for future health service delivery. There is a very real concern that if nurses and midwives cannot afford to live within reasonable proximity to their workplaces they will move and seek employment elsewhere. We are extremely concerned that due to lack of housing that is affordable, many nurses and midwives have to travel considerable distances to and from their home to their workplaces. This increases the risk not only to their health, particularly due to the nature of shift work and also places additional stress on family relationships. The NSWNMA has expressed these concern in previous submissions to local council's Affordable Housing Policies. Members of the NSWNMA also spoke at the Inner West Council meeting and stressed the need for nurses and midwives to live close to where they work. They articulated how lack of affordable housing impacted on recruitment and retention of staff and safety of shift workers travelling long distances.

There are many public and private hospitals and aged care facilities in the councils to be included in SEPP 70. It is essential that the nurses and midwives (and other key service workers) are able to secure safe,

appropriate and affordable housing within reasonable proximity to their workplaces. Each of the five councils have demonstrated the need for more affordable housing. We note that:

[Randwick City Council](#)

Identified in their Affordable Rental Housing Needs Analysis (2016) that both the Children's Hospital and the Royal Hospital for Women in Randwick have found it difficult to fill specialist nursing vacancies due to nurses being priced out of living in the area. ²

[Northern Beaches Council](#)

Found that nurses and midwives currently account for the second largest key worker jobs and the health and social assistance job sector will be the fastest growing sector across the Northern Beaches over the next 20 years. The opening of the Northern Beaches Hospital will 'significantly increase demand for local workers' (p.8).³

[Inner West Council](#)

Has made the commitment that they will monitor employment trends by sector within the local economy. They have identified six (6) target groups as having particular housing needs in the LGA. This includes, '*very low, low and moderate income workers, including shift workers*' (p. 15). Many nurses and midwives are moderate income earners as well as shift workers.⁴

[City of Canada Bay](#)

Concord Hospital, a major public hospital is located in the LGA and is the highest employer. The council anticipates an increase in the number of

² Randwick City Council 2016, *Randwick City Affordable Rental Housing Needs Analysis 2016*.

³ Northern Beaches Council 2016, *Northern Beaches Affordable Housing Needs Analysis*.

⁴ Inner West Council 2016, *Affordable Housing Policy*

health care, education and social service sector jobs in Sydney over the next 30 years and housing for key workers is essential.⁵

City of Ryde Council

There is a high level of unmet demand for affordable housing for key workers.⁶

The NSWNMA is supportive of initiatives that seek to reduce housing stress and increase the supply of affordable rental housing for very low to moderate income households. We support the inclusion of the five additional councils, Randwick City, Inner West, Northern Beaches, City of Ryde and City of Canada Bay in SEPP 70. Inclusion in SEPP 70 will enable a consistent approach to providing affordable rental housing in these Local Government Areas. Our members who work and live in other council areas are experiencing difficulty securing housing that is affordable. The NSWNMA is supportive of other councils across NSW also being included in SEPP70.

The Greater Sydney Commission (GSC) acknowledges that many workers, such as nurses, can only access housing that is affordable on the outskirts of Greater Sydney. These workers would generally be considered moderate income earners⁷. The NSWNMA is concerned that the GSC draft Plan recommends affordable rental housing targets for very low to low income earners, excluding these key workers who are moderate income earners. The NSWNMA encourages the NSW Government to include moderate income earners as eligible for affordable rental housing.

Conclusion

Inclusion under SEPP70 is the only reliable way for local councils to secure affordable housing. The NSWNMA supports the inclusion to amend SEPP 70

⁵ HillPDA (prepared for City of Canada Bay) 2017, Evidence Report – Affordable Rental Housing – Rhodes East

⁶ City of Ryde, *Affordable Housing Policy 2016-2031*.

⁷ Greater Sydney Commission 2017, *Draft Greater Sydney Region Plan*, NSW

to include the Randwick, Inner West, Northern Beaches, Ryde and Canada Bay as local government areas with a need for affordable housing. We strongly support the inclusion of moderate income earners in eligibility criteria for affordable housing. This would enable nurses and midwives (and other workers who work in key service areas) to access safe, appropriate and affordable housing within reasonable proximity to their workplaces.