

To: Land and Housing Corporation (LAHC)
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**Re: Explorer Street Eveleigh and Franklyn Street Glebe
Redevelopment Proposals**

Thank you for the opportunity to comment on the announcements and initial proposals for LAHC renewal projects at Franklyn Street Glebe and Explorer Street South Eveleigh.

General Concerns about LAHC's Approach

REDWatch is most disappointed that LAHC have not learnt from community reactions to their earlier redevelopment announcements.

Like Waterloo, we have an announcement in the lead up to Christmas. We also have a media announcement, carried behind a paywall, prior to any notice to effected tenants or consultation with them. These are some of the same mistakes made in Miller's Point and Waterloo. They have been strongly criticised by impacted communities and NGOs and yet LAHC persists with this approach.

It seems as if LAHC has a blind spot over the impacts of such announcements on the people directly impacted. All such announcements should be accompanied by the offer of and availability of, independent support for tenants from the very beginning of the process. The current approach seems to assume that support is not required until relocation teams are required. This leaves tenants, often with complex issues unsupported for a lengthy period.

Sydney Local Health District (SLHD) in their Waterloo Health Impact Assessment (HIA) have looked more closely at these impacts. LAHC need to learn from this work and incorporate appropriate processes for dealing with vulnerable people from the very beginning of their planning across the whole of the redevelopment process.

REDWatch further is concerned that LAHC have not adopted the Tenant's Union / Shelter proposal for [A Compact for Renewal: What tenants want from Renewal](#). The proposed compact sets out some principles and processes for redevelopment that have come from research work with tenants and agencies involved in previous LAHC redevelopments. The Tenants Union and Shelter NSW have been unable to achieve agreement with LAHC and DCJ over a compact that takes into account tenant experience and concerns.

In REDWatch's view, an agreement about the process from announcement to completion is crucial if LAHC are to minimise the redevelopment impact on the community impacted by a redevelopment. In the absence of agreement on a Compact, LAHC needs to take the current Compact proposal as a tenant and agency guideline for how they think LAHC should undertake public housing redevelopment.

We hence urge LAHC to adopt the Compact for the Franklyn Street Glebe and Explorer Street South Eveleigh redevelopments and to move to formalising and adopting the Compact across all LAHC redevelopments.

There is a tendency for LAHC to say it already does these things but then not to do them. It is important that agreed principles and practices are implemented within LAHC to protect

those most impacted by the redevelopment as part of LAHC's business as usual.

It is REDWatch's experience that LAHC have in the past made well-intentioned undertakings to tenants in Waterloo and then subsequently not followed through on those undertakings. In the latest round of proposals LAHC says that tenants will have a right to return, however in the briefing it was admitted in relation to South Eveleigh that the larger families will not be able to return because there will not be large enough properties built for them.

Undertakings should not be made unless there is a commitment to follow through even if that is inconvenient. In Waterloo, the early undertaking about keeping the community advised about what is happening morphed into long periods of silence in part because LAHC had nothing to announce. LAHC needs to ensure transparency and good communications and assurances even if it has little to say.

REDWatch is pleased that the City of Sydney has put in place a requirement for a Social Impact Assessment (SIA). In 2.3 of the Compact it says *"Tenants want agencies to conduct a social impact assessment (SIA) of the renewal plans to identify the social impacts and the strategies required to manage and mitigate those impacts. This should be a mandatory part for all renewal planning. Existing tenants and local agencies working with tenants in a renewal area should be key informants for the SIA."*

REDWatch is of the view that SIAs should be mandatory across all public housing redevelopments. We have recently made a submission to DPIE as part of its SIA consultation. It is REDWatch's view SIAs should be at the beginning of the planning process. In the same way, an initial SIA is proposed for issuing Secretaries requirements; REDWatch is of the view that for public housing redevelopments, a SIA should be in place as part of the material submitted to the Minister for approval and announcement. That SIA should assess the likely social impact of the announcement and put in place the mitigation measures required to manage and minimise that impact.

Such a SIA early in the planning and decision process would address the issues we have raised above regarding how announcements are made and what supports are offered from the beginning to tenants. We have attached our SIA submission to DPIE as it was developed out our experience around the Waterloo redevelopment and is hence relevant in part to the proposed redevelopments in Glebe and South Eveleigh.

In the absence of a pre-announcement SIA, we urge LAHC to request Elton Consulting urgently to undertake work on the announcement impact and to prepare as part of their SIA a Social Impact Management Plan (SIMP) that can address these impacts without further delay.

It is important in looking at support for tenants to understand that tenants will be reluctant to discuss many issues with LAHC / DCJ. There is a fear revealing somethings may affect their tenancy or what happens during relocation. For this reason, support should be provided through an external agency rather than by LAHC or DCJ staff or the 1800 number.

REDWatch is aware that there are some tenants in the redevelopment areas that were relocated previously from Millers Point. They are likely to have special concerns having been through a recent relocation process and being relatively recent in their establishment in a new community. There are also likely to be others who have undergone transfers or been relatively recently admitted into public housing who will find the certainty they thought they had achieved thrown into question.

The very nature of priority allocations and the makeup of public housing necessitates great care being taken throughout the life cycle of a proposed redevelopment.

REDWatch is not aware of a community centre operating with Glebe that might be able to provide support for impacted tenants. This is a further cause for concern. In a different way, the Explorer Street site is not within easy access off a local community centres and mapping

will be required to understand where people in both locations are receiving their professional and personal supports. It is likely that community infrastructure rather than the usual government funded infrastructure are important for these sites.

Special thought also needs to be given to proposals for community facilities within each of these developments. It may be more appropriate, for example, for a community centre servicing the broader Glebe area to be considered at that site rather than a smaller facility servicing just the redevelopment.

The problem of a facility just servicing the redevelopment is highlighted in South Eveleigh where the adjoining Social Housing properties may continue without facilities while those in the redevelopment have access to such facilities. In smaller sites it is important to look at needs in the broader community as well as to ensure that access to the services needed by people allocated to social housing also have access to the specialised services they need.

The relative small number of housing units in the proposed redevelopment area provides an opportunity to look at community facilities from the user perspective. This is not possible on a large estate like Waterloo but might be possible in these smaller estates. As neither site is close to a community centre some work as part of the SIA might provide some useful insights for these communities as well as for future work.

REDWatch is of the view that the working being done on human service improvements in Waterloo will also be applicable for other social housing sites both in understand the experience of tenants and in the areas requiring improvement. To this extent, the work done by Counterpoint Community Services on the [Waterloo Impact Project Report 2020](#) and the [Waterloo Impact Project Report 2020 Recommendations](#) is also relevant to public housing on this site.

REDWatch continues to be concerned that these developments are funded by the sale of public land. This approach reduces the land available to government in the longer term to provide social and affordable housing for a growing city. REDWatch would much prefer this land not be developed until the federal or state government are in a position to invest in the development of new social and affordable housing. This would increase the social and affordable housing yields from these sites.

In the case of Explorer Street we have seen no rationale as to why the existing properties must be redeveloped at this time. In 2011, the Redfern Waterloo Authority said they were in good condition. A future build of a mix of social and affordable housing on this site would be a far better outcome than pushing increased social housing onto 30% of the site and selling the balance 70% to fund the project.

REDWatch supports a well-managed “Build to Rent” development in preference to the current model as scarce inner city public land is not alienated from public use in the future.

The proposals do not go into detail about the quantity of affordable housing it expects to deliver. Affordable housing is both important for those working with a below average city income but it is also important for those growing up in social housing to be able to exit social housing.

REDWatch would like to see a significant increase in affordable housing delivered off public housing sites and it is of the view that Social and Affordable housing communities will provide more stable communities than those with individual private investors that are flipping properties and tenants.

REDWatch supports the [Aboriginal Affordable Housing Campaign](#) and its call for the delivery of Aboriginal Affordable and Social Housing from all redevelopments on government owned land in Redfern and Waterloo. The South Eveleigh site fits within the area covered by this demand.

While REDWatch recognises the importance of a 10% floor for Aboriginal Affordable and Social Housing in inner city housing, REDWatch is of the view that redevelopments of Government land have to provide additional Aboriginal affordable housing stock to provide a basis for an ongoing viable Aboriginal community to flourish in the Redfern-Waterloo area.

Comments on Explorer Street

In addition to our comments above that relate to the South Eveleigh site we have some specific site concerns we want to register.

This is a difficult site to develop if you want to push up density due to the park needing to be above the underground train tunnel. This means development needs to happen to the northern site boundary and as seen from the solar access diagrams for the three options; significant height to the North leaves little solar access to the park area in mid-winter. The Redfern Waterloo Authority in setting the planning controls for this site in 2006 proposed that buildings in this area should remain at their existing heights.

In further assessing Explorer Street site in 2011 under Built Environment Plan (BEP) 2 the RWA proposed, *"Future development should respond to the scale and built form of the existing apartment building between Rowley Street and Henderson Road. Building form and scale of any new development should seek to minimise overshadowing of South Sydney Rotary Park."* (page 61)

This site is not next to a State Significant Development at this point and exists in an established urban context that is unlikely to change unless the railway corridor behind it redevelops. Given this, any development within this site must, as the RWA proposed respond to the scale and built form surrounding it.

In BEP2 the RWA proposed that appropriate heights for the area currently proposed for redevelopment by LAHC (Block 25) would be 4-8 storeys with a FSR of 2.5:1 but this was not carried through into changed planning controls. The existing FSR controls for the site are 0.5:1 and the adjoining social housing site is 2.2:1.

Option C for Explorer Street as proposed by LAHC, puts a 4-8 storey option, which only provides the required solar access to the park for 2% of its area. This is most likely because the proposal has a FSR well in excess of the 2.5:1 proposed by the RWA, as LAHC are trying to increase substantially the development allowed on the site.

That option C is both the lowest in height and has the most impact on park solar access, highlights the density proposed. If one accepts that this density is needed, then the preferred option produces higher buildings to try to create some areas that meet solar access requirements for public space. This however would put these building out of character with their surrounding contexts.

What LAHC has not offered is an option that meets the BEP2 proposal. To do this LAHC would need to reduce the size of the redevelopment.

Given the need for good quality open space in a rapidly growing city REDWatch is of the view that appropriate height and density on this site should see the park receiving 50% direct sunlight between 9am and 3pm in mid-Winter, or in RWA terms, *"new development should seek to minimise overshadowing of South Sydney Rotary Park"*.

Even in LAHC's best solar access option (Concept A) only a third of the park space would receive 4 hours sun during mid-winter. The bulk of South Sydney Rotary Park is in winter shadow for the majority of the time.

Based on the RWA analysis, REDWatch is of the view that the proposed redevelopment is an over-development of the site and it cannot support any option presented.

LAHC will need to try harder if they are to put forward a proposal that both minimises overshadowing of South Sydney Rotary Park, has heights in sympathy with its surroundings while going after a significantly increased floor space on the South Eveleigh site.

While planning can only happen within the existing context, it is important also to consider that the railyards to the North of this site may also be redeveloped at some point.

UrbanGrowth included the railway site in its density diagrams based on expectations that Rail at some point would move their operations to another location. Already Mirvac have an option on the Large Erecting Shop behind the Rowley Street social housing when that site becomes surplus to rail requirements.

In the longer term, the redevelopment of the Explorer Street site should retain connectivity options to potential developments to its north rather than creating an impermeable wall to such potential developments. Pushing density to the North to gain solar park access will likely create a barrier to any redevelopment to the North.

If the existing Explorer Street housing stock is in good condition LAHC may be better holding off on this redevelopment and undertaking it at a later stage in conjunction with the railway land to the north.

REDWatch trusts that LAHC will take into account the concerns we have raised.

We look forward to continued engagement around both the people and built environment aspects of these proposed redevelopments.

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Attachment: REDWatch SIA Submission to DPIE based on Waterloo Experience

REDWatch is a residents and friends group covering Redfern Eveleigh Darlington and Waterloo (the same area originally covered by the Redfern Waterloo Authority). REDWatch monitors government activities in the area and seeks to ensure community involvement in all decisions made about the area. More details can be found at www.redwatch.org.au.