



Public Exhibition of the Planning Proposal for Explorer Street, Eveleigh site - DPE Explanation of Intended Effect (EIE) & draft Design Guide

SHELTER NSW SUBMISSION

1 December 2023



About Shelter NSW

Shelter NSW has been operating since 1975 as the state's peak housing policy and advocacy body. Our vision is to create a sustainable housing system that provides secure homes for all.

We pursue our vision through critical engagement with policy and practice and thought leadership. We provide systemic advocacy and advice on policy and legislation for the whole NSW housing system to resolve housing inequality.

We are especially concerned for low-income households which struggle to afford good-quality and well-located housing in the private market.

Shelter NSW is concerned about the housing crisis in NSW and the rising trends in homelessness; housing rental stress as well as the impacts of poor-quality housing, particularly on low-income households. Lower-cost properties are being steadily replaced with new ones at higher rents, and new concentrations of disadvantage have been created across our major cities and towns as low-income households are displaced. We advocate solutions that aim to make the housing system work towards delivering a fairer housing system for all.

We have an established interest in the development of social and affordable housing, including policies and practice around public housing estate renewal and associated property development. We have also been involved in the *Groundswell* coalition. *Groundswell* comprises a number of local community organisations from the Redfern and Waterloo area including REDwatch, Counterpoint Community Services, Inner Sydney Voice, Tenants' Union of NSW and Shelter NSW. It acts as a point of liaison between NSW Government agencies and community members regarding the development of the broader Eveleigh, Waterloo and Redfern areas.

Shelter NSW welcomes the opportunity to make a submission and thanks the Department of Planning for the opportunity.

Background to the NSW Government's proposal

The NSW Government ('the Government') is proposing to redevelop the Explorer Street, Eveleigh public housing estate ('the estate') which currently consists of 46 public housing in a townhouse configuration (ranging from one to three storeys). Each of these dwellings has between 3 to 5 bedrooms. According to the Government documents¹, the Explorer Street site is home to 98 people (as at March 2023).

¹ WSP (2023) [Social Infrastructure and Social Impact Assessment, Explorer Street, Eveleigh](#) (SIA) prepared for the NSW Department of Planning & Environment (DPE) accessed from the REDwatch website 30 November 2023 hereafter referred to as the SIA

The NSW Department of Planning and Environment (DPE)'s *Explanation of the Intended Effect (EIE)* proposes new development controls and zoning for the site and that the site be included under the Sydney Local Planning Environmental Plan 2012. The Government proposes to redevelop the site in order to achieve: *32,600 square metres of residential flat buildings providing approximately 400 homes including 30% social housing and 20% affordable housing*. By extrapolation this would translate to: 120 social, 80 affordable and 200 private dwellings. There would be 3 blocks ranging from 4 to 13 storeys.

The Government has not explicitly stated its plans for dwelling size but we note the following from the SIA² (regarding a proposed 394 units): 129 one-bedroom (33%), 192 two-bedroom (49%) and 72 three-bedroom (18%).

Rezoning controls would require 20% of all affordable housing to be provided as Aboriginal Affordable Housing (that being 20% of the 80 affordable dwellings)

In terms of the provision of social and affordable housing, the current proposal represents a change to an earlier NSW Government proposal for this site (2020) that is, 430 dwellings including 30% social dwellings (129 dwellings) but no affordable housing (and the full sale of public land).

The proposal also intends to facilitate a variety of other outcomes relating to parks, streets, footpaths, solar access, street trees and other accessible public spaces. The EIE also reiterates that the site is highly accessible inner-city location close to public transport, services and jobs.

Scope and approach of our submission

This submission will address some specific elements of the proposed new development controls and zones for the site but will also address broader issues that we believe ought to be noted at this stage. Some of these issues have been raised by the City for Sydney (the City)³ and noted in the Social Impact Assessment (SIA) for Explorer Street⁴.

Our submission:

- **is for the attention of the NSW Government (not just DPE).** We understand that the proposal regards the relatively confined issues of rezoning and controls. But we will explore a wide range of issues and in some cases, address our recommendations to the NSW Government – landlord of the current tenants; asset owner of the current public land and housing and provider/funder of many public and community services required to support the new development and community in Eveleigh. This is especially the case regarding the findings and recommendations of the SIA for

² WSP (2023) SIA at p59

³ City of Sydney (2023) - [Submission to the Explanation of Intended Effect, Explorer Street Eveleigh](#)

⁴ WSP (2023) op. cit.

Explorer Street. The SIA serves as a good reminder that the ‘social impacts’ of the Government’s proposal have already been felt by the public housing tenants at Explorer Street whether they be tenants of 20-30 years or more recently arrived from Millers Point.

- **will primarily focus on the social and affordable housing provisions described in the proposals.** We note however, that our affiliated community and resident organisations (within *Groundswell*, for example) as well as many local residents will provide valuable insight into factors such as public space, amenity and overall design. We encourage the consent authority to take heed of their feedback – as they represent a genuine source of information from a long-established diverse and engaged community.
- **endorses recommendations made by the City of Sydney regarding the built form, public infrastructure and sustainability,** for example those relating to setbacks; natural cross ventilation; trees and vegetation; open space; minimising urban heat effects; and protecting tenants, especially low-income, from the potential negative consequences of embedded energy networks.
- **will often refer to data for the broader Sydney Local Government Area (LGA).** Over time, planning for the broader Redfern-Waterloo-Eveleigh area has moved from the broader area to smaller elements. This forces a project-by-project response by organisations like Shelter NSW. While we appreciate that this may be easier for planners, financiers and future developers we do think this approach has restricted a more fulsome consideration of the cumulative opportunities and risks presented by specific proposals like this one for Eveleigh.

Executive Summary

The local government area of Sydney, like Greater Sydney continues to grow, and while the overall stock of housing has grown there has been a steady, proportionate decline in the stock of social housing (public and community) while the stock of Affordable Rental Housing (hereafter affordable housing) remains a niche offering.

The City of Sydney has identified that it needs 14,000 additional affordable and social dwellings by 2036⁵, setting a target of 7.5% social housing and 7.5% affordable housing of all residential housing stock. At first glance, the LGA appears to be well ahead when it comes to social housing, with the LGA’s stock being at 7.9% by June 2022. But closer examination reveals a worrying trend.

⁵ City of Sydney - [Community Strategic Plan](#) – Delivering Sustainable Sydney 2020-2050 accessed 30 November 2023

According to the City⁶, in the decade 2006 – 2016, the LGA’s stock of social housing increased by 841 dwellings, however, the **proportion of social housing stock compared to total households actually reduced from 11.7% to 9.2%**. By June 2020 this had **reduced again to 8.1% and by June 2022 was 7.9%**. In terms of affordable housing, the LGA has seen an increase in the number of dwellings, 1,268 affordable rental dwellings in 2022 (more than doubled over the decade) but currently representing just 1% of the city’s private dwelling stock.

While there are some Land and Housing Corporation (LAHC) inner city public housing redevelopments that will maintain the proportionate stock of social housing in that area, it is the larger-scale redevelopment like that proposed at Explorer Street Eveleigh and the very large redevelopment underway at nearby Waterloo South that will accelerate the process of dilution.

In a time when low-income households (but especially renters) are living with a high level of housing stress⁷ the combined planned and proposed proportionate reduction of social housing communities across the Sydney LGA should be understood to be proposals that actively reduce the proportionate representation of lower socio-economic people in the local area⁸.

At the end of October 2023, there were 57,930 households waiting for social housing (including 8,163 priority)⁹ across NSW. In the local allocation zone¹⁰ within which Eveleigh sits, there were 758 households waiting for social housing but a much larger combined **4,276 households approved and waiting for social housing in adjacent zones¹¹**

The proposed development is on NSW public land, home to a number of public housing tenants some of whom have lived there for 20-30 years and a long-standing and connected Aboriginal community. These tenants are already feeling the impact of the redevelopment proposal.¹²

We acknowledge and support the NSW Government’s move away from the ‘*Communities Plus*’ model, which shoehorned public housing estate redevelopment into a fixed 70:30 (private: social) housing mix and more generally drove the Land and Housing Corporation to sell valuable public land and dwellings in order to fund new and upgraded social housing stock across the state. In this submission, however we will advocate that **there are further**

⁶ City of Sydney Housing Audit (June 2022) – accessed 27 November 2023 [Housing Audit June 2022.pdf](#)

⁷ As described by Shelter NSW regarding the release of this year’s [rental-affordability-index](#) produced by SGS Economics

⁸ Rogers D. & Darcy, M. (July 8, 2020) [Public housing renewal likely to drive shift to private renters not owners in Sydney](#), *The Conversation* online article

⁷ Rogers & Darcy *ibid* analysis indicated that the proposed Waterloo redevelopment projects for example, would likely reduce the entire suburb’s proportion of social housing dwellings from 30% to about 17%. Private renters might rise to be more than 50% of households; challenging suggestions in the original research that the benefits of the social mix were based on owner-occupied and public housing neighbourhoods not on a transient renting population.

⁹ NSW Department of Communities and Justice (DCJ) - [social housing waiting list](#) accessed 30 November 2023

¹⁰ DCJ *ibid*. Allocation Zone CS1 Sydney

¹¹ DCJ *ibid*. Allocation zones CS2 Eastern Suburbs; CS3 Leichardt/Marrickville; CS7 Inner west

¹² SIA and consistent with the *Compact for Renewal – what tenants want from redevelopment* (2017) Shelter NSW & Tenants’ Union of NSW

options for the Government to improve and refine its approach to deliver an even better public outcome.

We believe the NSW Government has the responsibility and opportunity to build an exemplar community in Eveleigh – one where people from all walks of life, cultures, ages and incomes and tenure types can prosper; living in well-built and designed homes, buildings and public spaces. Unlike the private sector, with its short term focus on generating an acceptable level of financial return and minimising development risk¹³ the NSW Government has the opportunity to create dwellings, buildings and public spaces at Explorer Street Eveleigh that will support a diverse and changing community over time.

Given the massive disruption to current tenants, the large and growing unmet demand for social and affordable housing and the power of the public sector, we urge the NSW government to ensure the site needs works harder for the people of NSW.

We call on the NSW Government to commit to 100% social and affordable tenure mix on the Explorer Street, Eveleigh site.

In the case where this cannot be achieved, we call on the Government to **create as site-specific provision that 30% social housing and 20% affordable housing be set as minimums** and to actively seek out opportunities to **increase the number of social and affordable dwellings on the site**. We also recommend an additional requirement: that the social housing stock provided (at least 30%) provide homes for substantially more people than technically possible given the number of large dwellings. The need for this was raised in our December 2020 submission.¹⁴

At Shelter NSW, we advocate for Affordable Housing - in addition to social housing, not instead of it and commend the Government for requiring affordable homes on this site. In this submission however, we will call for a greater level of assurance. Specifically, any **affordable housing ought to be required to be in perpetuity**, owned and managed by a Tier 1 or Tier 2 Not-for-profit Community Housing provider (CHP) and be **rented to very low to moderate income households for no more than 30% of household income**.

Beyond the critical issue of the proposed tenure type we have a number of other concerns regarding the capacity of the future precinct to support diverse households in a highly dense built environment through the cycle of life.

The future Explorer Street neighbourhood needs to be:

- **“Big family friendly”** The current Explorer Street estate consists of 46 large public housing dwellings. Notwithstanding issues of underutilised dwellings, the current estate could clearly be described as “big family friendly”. Shelter NSW asserts that the

¹³ Khor, L., Taylor, L., Glackin, S., Rowley, S., Siebel, S., Tinios, D., Aziz, R. (2023) *From mixed tenure development to mixed tenure neighbourhoods*, AHURI Final Report No. 412, Australian Housing and Urban Research Institute Limited, Melbourne, accessed <https://www.ahuri.edu.au/research/final-reports/412>

¹⁴ Shelter NSW (2020) - [Submission-Explorer-St-Eveleigh](#) response to a redevelopment proposal

future estate should also be a 'big family friendly' community. This is required to provide a meaningful 'right of return' to existing tenants. But further, we call on the Government to help build the capacity of inner city suburbs like Eveleigh (and Erskineville, Waterloo and Redfern) to be ones where children and young people from all cultural, socio-economic and household types can happily live and grow. Importantly, this will require enough dwellings with 3+ bedrooms and well-designed community and open spaces.

- **A great home and community for renters (across all tenure types, ages, cultures and abilities).** We also call on the Government to think of this future precinct at Eveleigh, with its projected 800 residents¹⁵ as predominantly homes for renters. Close to 60% of households rent in the Sydney's city and inner south¹⁶. Above and beyond the proposed 50% social and affordable households it is clear that a large proportion of the 'private' component of the housing will be home to renters (and many of them low income)¹⁷. There is a compelling case that any provision deemed important for social and affordable dwellings and tenancies ought to also apply to the private component. We urge the Government to look at the accessibility, amenity and dwellings size requirements for all dwellings and tenure types and challenge any notion that the 'private' dwellings can be held to lesser standards.
- **Support the retention of Aboriginal people in the local area.** Eveleigh sits within a broader geographic area with a long and deep cultural significance to Aboriginal people. Without access to truly affordable and culturally appropriate housing these communities face further displacement. Shelter NSW supports the [Aboriginal Affordable Housing Campaign](#) which calls for 10% of any housing developed on Government land be devoted to Aboriginal people. This goes further than the current EIE proposal to require 20% of only affordable housing at Explorer Street be dedicated to Aboriginal people. Close to 20% of the current households are Aboriginal or Torres Strait Islander (9 households)¹⁸. The NSW Government needs to offer these households a meaningful return to Eveleigh but also create a precinct that welcomes future households.
- **An exemplar high-density, high rise precinct.** The NSW Government acknowledges that's its tenancy populations are increasingly vulnerable, requiring significant support. While Shelter NSW does not assert that high-rise living is, by definition, unsuitable for lower income people, it is well understood that the downsides of this type of living are most keenly felt by that cohort: *"it's not just the buildings, high-density neighbourhoods make life worse for the poor"*^{19 20} This is especially acute for those

¹⁵ DPE Draft Design Guide – Locality statement

¹⁶ ABC Census 2021

¹⁷ Rogers D. & Darcy, M. (July 8, 2020) [Public housing renewal likely to drive shift to private renters not owners in Sydney](#), *The Conversation* online article

¹⁸ WSP (2023) SIA at p30 Demographics and p39 Culture

¹⁹ Easthope,H., Troy,L. & Crommelin,L. (2017) [It's not just the buildings, high-density neighbourhoods make life worse for the poor \(theconversation.com\)](#) article in *The Conversation* published 22 August, 2017 accessed 28/4/22

²⁰ Easthope,H., Troy,L. & Crommelin,L. (2017) [This is why apartment living is different for the poor \(theconversation.com\)](#) article in *The Conversation* published 21 August, 2017 accessed 28/4/22

experiencing the compounding challenges associated with poor mental or physical health; loneliness and isolation. Given the proposed density of the site, care must be taken to create a place where large numbers of vulnerable people and lower-income people in general can reasonably live whether they be in social, affordable or private housing. If the Government can't deliver this then consideration should be given to reducing the density and/or changing its built form plans.

- **Change process – need for care and opportunity for co-design.** Any reading of the Social Impact Assessment (SIA) prepared for Explorer Street Eveleigh, reveals the extent of the dislocation and concern that is already being felt by the existing Explorer street community. This is unsurprising to us at Shelter NSW given the research behind the **Compact for Renewal**²¹. We call on the NSW Government to heed the concerns raised in the SIA (consistent with the Compact for Renewal) and quickly move to adopt the various mitigation measures it recommends.

Looking further ahead we call on the Government commit the necessary funds that will be required to support the: successful relocation and potential return of current public housing tenants; the future influx of many hundreds of new residents and the growth of a vibrant, supportive community, building on the cultural, social and community heritage of the suburb of Eveleigh.

The essential argument of our submission so far, is that the NSW Government has the power and the opportunity to demand more of this redevelopment proposal.

Beyond the specifics of increasing its ambition for the social and affordable housing on the site, we see a major opportunity to develop ambition for the 'private component'; with a view to developing a high-functioning, connected and diverse community in Eveleigh that will grow and change over time.

This vision we contend, is worthy of direct Government investment, innovative thinking and whole-of-government long term planning. In recent years, Shelter NSW released research, calling on the NSW Government to rethink its traditional approach to public housing estate renewal. While we acknowledge that the NSW Government has officially abandoned the *Communities Plus* approach, we believe there is still more room to improve and innovate to preserve valuable public land assets; deliver more social housing²² and consider how other government programs (State and Commonwealth) might be leveraged to optimise the public outcome within the 'private housing' domain.

²¹ UNSW City Futures Research Centre (2027), [A-compact-for-renewal-what-tenants-want-from-renewal](#) report prepared for Shelter NSW and the Tenants' Union of NSW

²² Murray, C. & Phibbs, P. (2021) *Reimagining the economics of public housing estate at Waterloo – a report for Shelter NSW* [access via shelternsw](#)

Recommendations

In this submission we call on the NSW Government to:

- **commit to 100% social and affordable tenure mix on the Explorer Street, Eveleigh site.**
- (In the case where this cannot be achieved) create a site-specific provision **that 30% social housing and 20% affordable housing be set as a minimum** and identify opportunities to **increase the number of social and affordable dwellings on the site** (ensuring substantially more tenants are accommodated versus current).
- **retain the site in public ownership (through leasehold arrangements rather than sale if necessary).**
- **require all Affordable Housing be in perpetuity**, owned and managed by a Tier 1 or Tier 2 Not-for-profit Community Housing provider (CHP) and be **rented to very low to moderate income households for no more than 30% of household income.**
- **require 10% of social and affordable housing be dedicated to the Aboriginal community** (10% of approx. 200 dwellings) and require design to be informed by architects with experience in (co)designing culturally appropriate housing. This should be informed by existing tenants and their families wishing to return and those on the social housing waiting list waiting for allocation²³
- **apply an innovative commercial, funding and tendering** model to the development of this site to enable the retention of public land and maximisation of social and affordable housing and other 'diverse' forms of housing (including within the 'private' housing component').
- **leverage other government programs (state and Commonwealth) to maximise diverse housing within the 'private' dwellings.** For example, Shared Equity home purchase; disability and aged care subsidies.
- **ensure lower-income residents (overwhelmingly renters) whether in social, affordable or private dwellings are a key focus for the precinct, building and dwelling design considerations** (taking account of the overlaying housing diversity and adaptability needs that arise from disability, cultural considerations, family size and the desire to age in place). This may require challenging the traditional narrow focus of private developers, often catering more for investors when designing new apartment buildings leading to limited variation in apartment designs and sizes available²⁴

²³ As per WSP (2023) SIA Recommendation 33

²⁴ Easthope, H., Crommelin, L., Troy, L., Davison, G., Nethercote, M., Foster, S., van den Nouwelant, R., Kleeman, A., Randolph, B., and Horne, R. (2020) *Improving outcomes for apartment residents and neighbourhoods*, AHURI Final Report 329, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/finalreports/329>, doi: 10.18408/ahuri-7120701 [Improving outcomes for apartment residents and neighbourhoods—Executive Summary \(ahuri.edu.au\)](http://www.ahuri.edu.au/research/finalreports/329)

- **ensure dwelling size across all tenures but especially social and affordable housing can accommodate large and changing family sizes and circumstances.** This is required in order to provide a meaningful 'right of return' to existing tenants and to add to the diversity of dwellings in the local area. This might include 'dual key' designs to enable more flexible configurations; larger or multiple living areas to house transient family visitors²⁵. This is especially important for Aboriginal families but also women escaping domestic violence and residents requiring live-in carers.
- **commit to demonstrating a superior environmental performance in the redeveloped estate** (beyond minimum compliance) to support the health and well-being of lower-income residents (in all tenures), reduce energy bills and generally increase the long-term resilience of the community. Include design provisions to minimise urban heat effect.
- **ensure any embedded networks are not allowed to act in a monopolistic way,** locking tenants, and especially low-income tenants into costly energy contracts.
- As low-income tenants enter/transfer/return to Eveleigh, **incorporate a general appliance replacement program directed to lower-income households.**
- **develop a plan (now) to create and support an exemplar high rise community precinct.** While we are not against high rise living *per se* we note the research finds that lower-income households are disproportionately affected by challenges associated with apartment living. If meaningful, funded mitigation plans can't be developed then consideration should be given to reducing the density of the site
- **adopt recommendations made by City of Sydney²⁶ regarding the built form, public infrastructure and sustainability,** for example those relating to setbacks; natural cross ventilation; trees and vegetation; open space; and minimising urban heat effects. Require any future development applications (DAs) made in respect of the Explorer Street Site to comply with the draft Design Guide (rather than just consider).
- **ensure 100% of social and affordable dwellings is delivered to the liveable Housing Guideline Gold level,** as per the City's recommendation that all private market housing should achieve minimum Silver level (with 10% platinum)
- assign responsibility to Homes NSW to review the **Social Impact Assessment and develop a comprehensive risk mitigation plan.** Incorporate insight from the **Compact for Renewal** as a means of ensuring best practice tenant engagement in the relocation and resettlement process. Actively engage the Aboriginal Housing Office (AHO) and other cultural and language specialists.

²⁵ WSP SIA at p 60

²⁶ City of Sydney (2023) – Submission to the Explorer Street EIE and draft Design Guide

Further information

1. Social housing is in relative decline in the City of Sydney and Affordable Housing is (still) in its infancy

In the decade 2006 – 2016, the City of Sydney reported that while the stock of social housing increased by 841 dwellings, the proportion of that stock compared to total households actually reduced from 11.7% to 9.2%. By June 2020 this has reduced again to 8.1% and by June 2022 was 7.9%

According to the City of Sydney Housing Audit, as at June 2022²⁷, there were:

– **9,691 social (including public) housing dwellings comprised 7.9% of the city’s private dwelling stock**, a decline compared to 9,849 in 2012.

– **1,268 affordable rental housing dwellings**, over double compared to 619 in 2012 but representing just 1% of the city’s private dwelling stock

In the City’s Community Strategic Plan, Target 6 states that:

“By 2036 there will be at least 156,000 private dwellings and 17,500 non-private dwellings that include boarding houses and student accommodation.

Of the private dwellings, 7.5% will be social housing and 7.5% will be affordable housing with this proportion maintained into the future.”

Table 1: adapted from *City of Sydney Housing provision to 2036*

Housing in Sydney LGA	Total 2016	2016–2021 (0–5 year) target	2022–2026 (6–10 year) target	2027–2036 (11–20 year) contribution	Total 2036
<i>Affordable</i>	835	+2714	+2714	+5428	11,690
<i>Social</i>	9,716	+494	+494	+987	11,690
Total Dwellings	117,429				173,429

²⁷ City of Sydney Housing Audit (June 2022) – accessed 29 November 2023 [Housing Audit June 2022.pdf Table 5](#)

2. Renting is the dominant tenure type in the City of Sydney

As illustrated in Table 1, and noted by the City, over the decade to 2021 there has been a proportionate increase in the number of households living in :

- rental dwellings (now greater than 65%)
- private rental dwellings (now greater than 57% of all rental households) with the reduction in the number of social housing dwellings decreasing

Table 2. City of Sydney - Proportion of landlord type: 2011 - 2021²⁸. City of Sydney, ABS Census 2011-2021

	2011%	2016%	2021%
Fully owned	14.4%	14.5%	14.3%
Mortgage	23.5%	20.3%	19.3%
Renting - Total	60.5%	63.5%	65.1%
Renting - Social housing	9.9%	9.2%	7.3%
Renting - Private	50.2%	54.0%	57.6%
Renting - Not stated	0.4%	0.3%	0.2%
Other tenure type	1.6%	1.8%	1.4%

Other evidence of unmet need for housing across NSW and Sydney:

- **Demand for social housing.** At the end of October 2023, there were 57,930 households waiting for social housing (including 8,163 priority) ²⁹ across NSW. In the local allocation zone³⁰ within which Eveleigh sits, there were 758 households waiting for social housing but a much larger combined 4,276 households approved and waiting for social housing in adjacent zones³¹
- **(NRAS) Commonwealth scheme ending.** The National Rental Assistance Scheme (NRAS)³² is expiring across the country ³³: 906 have already expired in NSW with a further 5,639 properties due to expire by 2026. Many of these properties will be in the City of Sydney.

²⁸ City of Sydney Housing Audit (June 2022) – (Table 1) accessed 27 November 2023 [Housing Audit June 2022.pdf](#)

²⁹ NSW Department of Communities and Justice (DCJ) - [social housing waiting list](#) accessed 30 November 2023

³⁰ DCJ *ibid.* Allocation Zone CS1 Sydney

³¹ DCJ *ibid.* Allocation zones CS2 Eastern Suburbs; CS3 Leichardt/Marrickville; CS7 Inner west

³² This is a Commonwealth & State program. Eligible NRAS applicants from low-moderate incomes attract a contribution for each approved home; rent is set at least 20% below the prevailing market rates

³³ Commonwealth Government (June 2021) [nras-quarterly-report-30-jun-2021.pdf \(dss.gov.au\)](#) at p3

3. Key and Essential Workers are suffering acute housing stress across Sydney – especially in the inner city

At Shelter NSW, we advocate for Affordable Housing - in addition to social housing, not instead of it. It responds to an important group that is often overlooked – financially stressed renters in the insecure, private residential housing market (renters who otherwise generally don't qualify for social housing). And it also caters for important key workers, including many from the government's own workforces who are best placed if they live and work in the same area. Currently, these key workers (including from the local Aboriginal community) are being displaced from the city and the communities they serve.

We commend the Government for requiring affordable homes on the Explorer Street site but urge the Government to clarify and confirm what public policy outcome it is seeking for this tenure type. Is it for example to support lower paid essential workers or perhaps moderate income (Government) key workers? In a recent submission to the NSW Government³⁴ for example, Shelter NSW noted the option for Government to require that a range of household income types be required to be accommodated in affordable housing in development subject to density bonuses

The SIA³⁵ also notes the potential for affordable housing within the future Explore Street development to provide a pathway out of social housing.

4. Aboriginal people are currently well-represented in Eveleigh and the surrounding suburbs – retention required

Eveleigh sits within a broader geographic area with long and deep cultural significance to Aboriginal people. Without access to truly affordable and culturally appropriate housing these communities face further displacement. Close to 20% of the current Explorer Street households are Aboriginal or Torres Strait Islander (9 households)³⁶. The NSW Government needs to offer these households a meaningful return to Eveleigh but also create a precinct that welcomes future households.

Shelter NSW endorses the position of the City of Sydney³⁷, in its *Housing for All: Local Housing Strategy (2020)*:

The Strategy... highlights the need to support Aboriginal and Torres Strait Islander people maintain ties to the local community. This includes ensuring suitable social and affordable housing managed by Aboriginal community housing providers and led by Aboriginal people

³⁴ Shelter NSW (2023) [Submission regarding Draft Housing SEPP - Social and Affordable Housing Reforms](#)

³⁵ WSP SIA (2023) Op. cit. at p11

³⁶ WSP (2023) SIA at p30 Demographics and p39 Culture

³⁷ Ibid.

and organisations as a continued expression of self-determination. The Strategy notes that when the Redfern-Waterloo development area was established in 2004, one of the objects of the legislation was to promote, support and respect the Aboriginal community in Redfern-Waterloo, having regard to the importance of the area to the Aboriginal people

The Eveleigh SIA echoes concerns made by Aboriginal people in other precinct consultations³⁸. These include concerns that the extent of change and failure to ensure low-cost housing will (and has already) in a practical sense displaced Aboriginal people from the local area. The SIA also provides recommendations about the need and opportunity for architects with experience in co-designing in various cultural environments be engaged. Current and future tenants should be engaged to provide insight and feedback.

Aboriginal people have called on the Government to ensure a *proportion of affordable housing should be targeted to Aboriginal people who are being forced out of the area*. Shelter NSW supports the campaign [Aboriginal Affordable Housing Campaign](#) which calls for 10% of any housing developed on Government land be devoted to Aboriginal people and for affordable housing programs.

5. Supporting a future hi-rise Explorer Street, Eveleigh Community with many lower-income renters

What does 'density done well' look and feel like if you're a low-income renter?

According to AHURI research by Easthope et al³⁹, **10% of the Australian population lives in an apartment (and increasing), mainly in capital cities (85%)**. Our interest at Shelter NSW is with the **39% of households living in high-density apartments from lower income households**.⁴⁰ And while we are not against high rise living *per se* we note the research also finds that these lower-income households, *over-represented compared to other dwelling types are disproportionately affected by challenges associated with apartment*

³⁸ Ibid at p162

³⁹ Easthope, H., Crommelin, L., Troy, L., Davison, G., Nethercote, M., Foster, S., van den Nouweland, R., Kleeman, A., Randolph, B., and Horne, R. (2020) *Improving outcomes for apartment residents and neighbourhoods*, AHURI Final Report 329, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/finalreports/329>, doi: 10.18408/ahuri-7120701
[Improving outcomes for apartment residents and neighbourhoods—Executive Summary \(ahuri.edu.au\)](#)

⁴⁰ Easthope, H., Troy, L. & Crommelin, L. (2017) AHURi research funded by Shelter NSW *Equitable Density: The place for lower-income and disadvantage households in a dense city* sourced from UNSW City Futures Research Centre: <https://cityfutures.adu.unsw.edu.au/research/projects/equitable-density-place-lower-income-and-disadvantage-households-dense-city/>

living. Importantly these researchers have noted that, “it’s not just the buildings, high-density neighbourhoods make life worse for the poor”^{41 42}

The experiences of apartment living for lower-income apartment residents are influenced by factors such *infrastructure provision, urban design, building design and management, neighbourhood amenities and facilities, and ongoing place management and community engagement*. Tensions can arise from a variety of sources – whether it be noise, conflict over shared spaces like gardens and laundries or the management of safety and security issues. And of course, these tensions are in many cases landing on people already stressed by the pressures of poverty, insecure work and any number of personal or health circumstances.

Navigating these issues is difficult for most people, but lower income renters whether social, affordable or private, have less flexibility and capacity to simply move if the situation becomes untenable. This is especially the case in a tight rental market with limited options for low-income people (let alone those with families, disabilities, carer responsibilities or other complicating factors).

Darcy and Rogers⁴³ observed in 2019 that higher density inner city areas have a higher proportion of private renters. While Redfern-Waterloo-Eveleigh-Erskineville is already a dense area dominated by renters this planning proposal in Eveleigh will see that phenomena amplified, and, along with it, a potential escalation of the downsides of high-density apartment living.

At the suburb level, Darcy and Rogers, forecast that the Waterloo South estate redevelopment nearby would reduce the overall suburb’s proportion of social housing dwellings from 30% to about 17%.⁴⁴ While much smaller we can expect a similar dilution in Eveleigh. The SIA already notes that current tenants fear what this might mean for them – feeling like “an outsider” within a community where they currently feel connected and secure.

Beyond issues of affordability and precarity, we are also concerned that the needs and aspirations of future lower-income renters be addressed. And not just as ribbons are cut but over time as the Eveleigh community ages and changes. As Easthope et al note⁴⁵ *underpinning the high-density development of Australian cities is a policy orthodoxy that privileges market-led housing delivery and a reduced government role in direct housing provision and management... policy interventions directed at lower-income apartment residents have been limited*. They are also note the narrow and short-term focus of private

⁴¹ Easthope,H., Troy,L. & Crommelin,L. (2017) *It’s not just the buildings, high-density neighbourhoods make life worse for the poor* (theconversation.com) article in The Conversation published 22 August, 2017 accessed 28/4/22

⁴² Easthope,H., Troy,L. & Crommelin,L. (2017) *This is why apartment living is different for the poor* (theconversation.com) article in The Conversation published 21 August, 2017 accessed 28/4/22

⁴³ Darcy,M. & Rogers,D. (2019) University of Sydney, The Henry Halloran Trust *Social Mix discussion paper* at p9

⁴⁴ Rogers. & Darcy. (2020) <https://theconversation.com/public-housing-renewal-likely-to-drive-shift-to-private-renters-not-owners-in-sydney-133352> article published on the online journal The Conversation, accessed 28/4/22

⁴⁵ Easthope et al (2020) op. cit. Executive Summary at p3

developers, often catering more for investors when designing new apartment buildings leading to limited variation in apartment designs and sizes available.

As a Government-led development we advocate that this phenomena to be actively resisted.

As WSP note in the SIA:

LAHC's Good Design for Social Housing (2020) provides relevant principles for social housing design... including in relation to healthy and quality environments, mixed tenure, public spaces, resilience, low cost for tenants, and contribution to local character. What are they? Why not apply to the whole building?

Given the risks of creating a future, denser precinct that makes 'life worse for the poor' we encourage the Government to step in at this early stage and ensure the Eveleigh development puts lower-income people front and centre.

Furthermore, we call on the Government to actively assess and commit the necessary funds required to support the: successful relocation and return of current public housing tenants; the influx of many hundreds of new residents and the growth of a vibrant, supportive community, building on the cultural, social and community heritage of the suburb

6. Environmental performance of the Explorer Street buildings and homes

Across the general community there is a deepening realisation of the cost of living with rising temperatures and energy-inefficient homes and appliances; a challenge disproportionately felt by lower income households. These households have the least financial ability to adapt and respond⁴⁶ and spend a disproportionately large part of their disposable income on energy costs (6.4% versus 1.2%).⁴⁷ Beyond the financial impacts, these households are challenged to the deal with the health and well-being impacts of rising temperatures and rising energy costs⁴⁸ Whether as private or social/affordable housing renters or low-income homeowners, these households often have little control over the energy efficiency of their homes and little financial capacity to upgrade old, inefficient appliances such as water and space heating/cooling systems.

⁴⁶ Deloitte (2021), *The economic impacts of the National Low-Income Energy Productivity Program*, report prepared for the Australian Council of Social Service [Link to report accessed 27 Jan 2022](#)

⁴⁷ Australian Energy Regulator 2019, *Affordability in retail energy market*, Commonwealth of Australia, Canberra.

⁴⁸ Grey, C.N.B. et al 2017, 'Cold homes, fuel poverty and energy efficiency improvements: A longitudinal focus group approach, *Indoor and Built Environment*, vol. 26, iss.7, pp.902-913. doi:[10.1177/1420326X17703450](https://doi.org/10.1177/1420326X17703450)

7. Need for a more innovative and commercial business model

In 2021 Shelter NSW released research calling on the (then) NSW Government to rethink its traditional approach to supplying social housing across the state – an approach that we asserted, was holding back its key agency LAHC and compromising the delivery of enough social housing to make a material difference to the housing crisis in NSW⁴⁹. In our public commentary⁵⁰ we observed that the *Communities Plus* model had become so entrenched (we believed) it had also stymied creative thinking about how a project like the Waterloo South development could be delivered for the greater public good.

While the current Government has changed approach to public housing estate redevelopment, we believe there are still other options for consideration. The research for example, asserted that public land should not only be retained but leveraged.

By way of illustration for Waterloo South for example, it proposed an alternative *model whereby 50% of new dwellings are public housing, 25% are retained by LAHC as build-to-rent housing at market prices, and 25% are sold by LAHC to the private market ... using low-cost leverage to generate positive cashflow and maximises exposure to long-term capital gains for LAHC*.

In a similar sense, Professor Bill Randolph and Dr Laurence Troy⁵¹ in their submission to the Waterloo South Independent Advisory Group (IAG) asked why the adoption of a private sector model, *as the only mechanism through which either plan is enacted* had not been debated? They made a strong case for a Not-for-Profit led renewal of Waterloo South as a clear and viable alternative to the public-private partnership development model pursued under the *Communities Plus* scheme. Under their proposal, delivery of a substantial component of Affordable Housing by the Community Housing Provider (CHP) sector would open new possibilities for the commercial, financial and operational delivery of the project. We look to the awarding of the⁵² contact to develop the mixed-use Elizabeth Street, Redfern project to CHP Bridge Housing as a good example of this approach.

Unlike the large and complex Waterloo South ‘superlot’ project we believe the Explorer Street Eveleigh project offers ample opportunity to explore creative options like long-term leasing (versus sale) of public land and the appointment of Not-For-Profit CHPs as lead developers.

⁴⁹ Murray, C. & Phibbs, P. (2021) https://sheltersnsw.org.au/news_items/reimagining-the-economics-of-public-housing-estate-renewal-and-the-role-of-government-new-research/

⁵⁰ Morton, R (March 5 2022) The Saturday Paper [Exclusive-leaked-documents-show-public-housing-plan-halved](#) (paywalled)

⁵¹ Randolph, B. & Troy, L. (2021) [Appendix A Submission to the Waterloo South Independent Assessment Panel.pdf](#)

⁵² Bridge Housing 2022 - [media announcement](#)

We also encourage the NSW Government to leverage other government programs (state and Commonwealth) to maximise diverse housing within the 'private' dwellings. Programs like Shared Equity schemes to support home ownership for targeted low-income cohorts and broader subsidies associated with Commonwealth disability and aged care programs may facilitate greater diversity within the development and especially within the private component.

8. Compact for Renewal – what tenants want from renewal

The Social Impact Assessment⁵³ provides some important insight into the demographics of the current Explorer Street community:

- *A large proportion of the resident population can be considered as seniors, with 63% of main tenants aged over 60 and 23% aged over 70.*
- *Nearly 22% of households are home to at least one person under the age of 18*
- *39% of households have lived in their dwelling for more than 20 years. Another 32% have lived in their dwelling between 10 and 20 years.*

This indicates an extremely grounded and established population, with potentially strong community connections, local routines and way of life.

Relocation of current tenants, whether returning or resettling in other locations will, and is already, stressful and disruptive. Tenants are already feeling the impact of being told that they will need to leave their current homes and community. Some are employed and wonder how this renewal will affect their employment. Many are highly engaged in the social and community networks of the suburb and their neighbourhood and wonder what will happen when they move. Many, such as these older residents noted above, worry about how they will maintain practical access to trusted doctors, chemists and other support services they have come to rely on. Some are houseproud and wonder how their personal investment in their homes (townhouses and gardens) will be replicated, recognised and compensated.⁵⁴ Many of the parents will worry about the disruption to children whether they be at home, in childcare or school.

While some tenant households are long-term, some are more recent, with the SIA noting⁵⁵ that some of the existing residents (two to three households) have already been relocated to the site from Millers Point a few years ago. Being advised that they may need to

⁵³ WSP (2023) SIA at p30

⁵⁴ WSP (2023) SIA – at page 20 resident concerns noted

⁵⁵ Ibid at p74

relocate again obviously presents a cumulative negative impact and anxiety. These households will require additional care and empathy. As an aside, we wonder at Shelter NSW how such an outcome was allowed to occur. Relocating tenants to estates that are likely to be redeveloped ought to be avoided.

With the benefit of having observed the progress and impact of a number of public housing estate renewal projects, Shelter NSW encourages the NSW Government to actively engage and support community members now, recognising that the impact of the redevelopment and relocation process has already begun. In many cases that will require the bringing forward of activities usually associated with tenant relocation and will require cultural and language specialists to assist.

We also encourage the NSW Government to seek out current and future residents wanting to influence the design of their future homes and community. If future residents can't be directly consulted then there needs to be a concerted effort to develop insights about certain cohorts who will join the Explorer Street community, such as children and young people; people living with disability; single parents and women escaping domestic violence.

Shelter NSW recognises that the level of engagement we are advocating for requires the partnership between the Departments of Planning, LAHC, Aboriginal Housing Office and the Department of Families, Communities and Justice (DCJ). We hope and trust that the formation of Homes NSW will facilitate and lead this.

We have heard directly from public housing tenants who have or are already part of an estate renewal project in other parts of Greater Sydney. They have told us what works well, and what doesn't – for residents and the overall project. We offer the [Compact for Renewal](#)⁵⁶ as a template for how the NSW Government might best engage with the Eveleigh community from this early stage right through to relocation and possible return

⁵⁶ *Compact for Renewal – What Tenants Want from Renewal*. These are the principles for a proposed *Compact for Renewal* between agencies undertaking urban renewal and social housing tenants affected by renewal. The Compact is the result of consultations with social housing tenants under a project carried out by Shelter NSW, Tenants' Union of NSW and the City Futures Research Centre at UNSW