

Submission re. Waterloo South Gateway Determination

This submission concerns the social impacts of the proposed Waterloo South urban renewal project.

I am a social planner with extensive experience in assessing the likely social consequences of planning proposals. I am also a lecturer at Macquarie University where I teach a specialist social impact assessment course as part of Macquarie's planning degrees.

The Waterloo South Gateway Determination report concerns the current proposal for the re-development of an area defined as Waterloo South. In summary, the base proposal is for 847 social housing units distributed on a smaller footprint than the current social housing (749 units) within a development of largely in 8-13 storey towers and four 27-32 storey towers. A small number of affordable dwellings (some 5-10% of net additional units) and 1,976 private market dwellings, 12,000m² commercial space and up to 5,000 m² for community facilities including a child care centre are also proposed. With a residential design excellence bonus, the development could be 10% larger than outlined in the base case. The development would reduce the proportion of social housing units in the area by some 70% to 27.7% of residential units but locate these in high density and high rise built form. Essentially, the aim of the project is to replace existing residential buildings, which are mostly social housing, with new, mostly privately owned dwellings at a greater density.

Residential units are where people live. Thus, both the current and proposed primary uses of this area are social. People's living conditions will be the long term product of the development. Since living conditions can vary from excellent to poor, the development proposal should address a basic criterion, namely:

Does the current proposal identify, and aim to avoid, foreseeable adverse social impacts?

This submission sets out:

- the several ways in which the current documentation fails to meet this basic criterion, and
- a non-exhaustive list of significant social impact issues which should be addressed before a Gateway Determination is made.

The Waterloo South Social Sustainability Report

In March 2020, a Waterloo South Social Sustainability Report [WS SSR] was prepared by the consulting firm Eltons for the NSW Land and Housing Corporation [LAHC]. The WS SSR states that it was prepared in response to Section 23 of Study Requirements for the Waterloo South project issued by the Department of Planning [DPE] to support a rezoning application to be lodged with the City of Sydney. The fundamental purpose of the report was to 'identify measures to promote positive social outcomes throughout the development of Waterloo South' and this was reflected in the Study Requirement 'to guide the implementation and scope of the project to promote positive social outcomes' (WS SSR p4).

While the Study Requirements also required an 'in-depth social needs analysis' and consideration of 'the relative equity of the project' (WS SSR p5), they did not require identification or assessment of likely adverse social impacts that might arise from the nature of the project or aspects of it. That is, the promotion of positive social outcomes was not expected to be derived from a consideration of what might go wrong. In fact there appears to be an underlying assumption that nothing could go wrong.

A separate Social Baseline Report was also prepared by the consulting firm GHD for LAHC. Although it was said to include 'recommendations and next steps to inform the preparation of the Social Sustainability Study' (GHD p i), the two documents were published concurrently (in March 2020).

The WS SSR was also prepared in response to City of Sydney Planning Proposal Lodgement Checklist requirements which included requirements for an 'outline of likely impacts' on relevant communities and 'a plan to reduce negative impacts' (WS SSR p5). These requirements seem to assume that 'likely impacts' might include some negative ones, but there was no direct requirement to work out what these might be. Further, the WS SSR says

Conversations between LAHC and the City of Sydney have confirmed that a social impact assessment was not required and a Social Sustainability Report could be submitted. This Report does not intend to follow the methodology of a Social Impact Assessment, however, it responds to the above requirements (WS SSR p 6)

The WS SSR was dated 25 March 2020 - more than a year before DPE published its Social Impact Assessment (SIA) Guideline for State Significant Projects. It might be said, therefore, that a SIA was not a mandatory requirement for this project. However, the question whether a SIA would be appropriate at this stage of major project development was raised by the consultants as reported at p6.

It appears therefore that failure to prepare a SIA, and identify likely adverse consequences, was not an oversight but a choice exercised by the responsible agencies.

The Gateway process is an initial and strategic high level assessment of what is proposed so as to avoid foreseeable flaws in subsequent development processes. The Redfern-Waterloo urban area is listed in Schedule 2 of the State and Regional Development SEPP 2011. The SEPP does not suggest that a major project at Gateway stage is not State Significant. In addition, while the Department's 2021 SIA Guideline for State Significant Projects had yet to be published, numerous guidelines were available at the time to which the LAHC could have referred for suitable methodologies. Even if a SIA as such were not mandatory, it was, and is, simply good practice to exercise caution at the early planning stages of a major urban renewal. One of the key functions of a SIA is to activate precaution. Consideration of social benefits alone is not a precautionary process. Assessing a planning proposal in terms of its likely benefits only is fundamentally flawed.

The omission of a SIA at this stage is formative. It validates a substantive and significant shortcoming in the planning process, and creates a precedent for omission of key social impact issues in subsequent documents. For this reason alone, the Gateway Determination Report lacks a justifiable basis for proposing this social initiative. A social sustainability report, and the WS SSR in particular, is not an alternative to a SIA.

A review of the documents suggests this Gateway proposal gives priority to developer financial feasibility considerations rather than the long term social quality and value of the places where people will live. Avoidance of a SIA appears to support this interpretation. An assessment is needed to take a long-view account of emerging futures to ensure that the buildings, and their spatial context, will be fit for their social purpose during their anticipated life, that is, not just during the period in which the developer profits.

In addition to the above major omission, the WS SSR report structure limits its analysis to three headings 'place, people and process' (WS SSR p 42). The basis for this report structure is unclear. It constitutes a second formative restriction on an assessment of likely social impacts. For example, the WS SSR could just as easily have been (but was not) structured under headings with a clear futures and precautionary focus, such as distributive equity impacts, public health impacts and climate warming impacts.

As it is, at best, the WS SSR is a wish list spun along with unsubstantiated claims and generalised assertions. This is epitomised by the list of targeted initiatives which appears at page 75 of the WS SSR, an extract of which is provided below.

Extracted from Table 7 WS SSR p 75

Group	Issues	Targeted initiatives
Children and families	High unemployment and low education levels Change in existing social and support networks	Access to programs and support groups especially for sole parent families Recreational opportunities through public open space Affordable childcare
Young people	Disengaged youth Mental health and drug and alcohol abuse	Training and employment Youth support services Subsidised TAFE Recreational opportunities

Targeted initiatives are beyond the scope of the project.

Further,

- According to the WS SSR, the list of issues and responses in Table 7 both 'identifies key issues and targeted measures for different groups of the community' and 'will be considered for targeted delivery to social housing residents ... by the future proponent' (WS SSR para 5.4.4 p 74). This sentence is not even consistent.
- The strategies as summarised in the WS SSR Executive Summary seem to be largely focused on social housing residents who will comprise at most 28%¹ of the anticipated residents of Waterloo South.

¹ Since most public housing residents are sole occupiers, 30% of dwellings (or 27.8% of GFA) is unlikely to result in 28% of residents being public housing residents.

- The WS SSR mentions the social determinants of health (p 19) but not the key findings of that literature as they apply to planning for housing.
- The WS SSR appears to accept that studies said to be underway are a sufficient substitute for identifying critical social issues.
- The WS SSR suggests that 6700m² would be provided for community purposes but fails to note that the child care centre, OOSH services and recreation facilities requiring an entry fee are likely to be mainly used by non-social housing residents – thus avoiding equity of access and provision issues.
- The WS SSR says that single tenure of buildings is supported by consultation findings (p44), but fails to say
 - a who was consulted,
 - b the stakeholder interests they represent, or
 - c how this feedback relates to research findings on this topic.

In short, the scope of the WS SSR is narrow both in terms of its focus on social benefits and in terms of its treatment of selected topics. It is opaque rather than foresightful. It does not appear to be tied to a strategic merit assessment of specific likely social impacts of this proposed development.

By failing to consider

- potential adverse social impacts,
- distributional equity issues,
- public health impacts,
- social consequences of climate change, and
- recent and foreseeable changes to the nature and distribution of work, work places and patterns of transport,

the WS SSR cannot be said to contribute reliably to a high-level strategic merit assessment of the social impacts of the proposed development. This is significant as the proposal is primarily for a long term residential development.

As a result a major required component of the Gateway Determination process appears to be missing. Thus, the Waterloo South Gateway Determination Report does not appear to meet the Department's requirements for 'a high-level check'

and 'a strategic merit assessment' of this planning proposal against 'potential environmental, social, economic and infrastructure impacts'.²

Strategic merit assessment omissions

The current proposal omits high level strategic social outcome concerns, which include but are not limited to:

- i the distributive impacts of the proposed development on social housing and private housing in the City of Sydney and, separately, Greater Sydney;
- ii other distributive equity issues (such as the potential use of social housing as a noise and pollution buffer for other residential development &/or to occupy the least desirable parts of the site);
- iii the social consequences of spatial segregation by housing occupant type;
- iv the social risks of concentrating people with high level complex needs in dense high rise developments;
- v the social impacts of high density urban development in the context of climate change;
- vi the social impacts of the role of high density dwellings in increasing infection rates and contributing to other public health risks;
- vii the implications of current and likely changes in workplace locations and travel to work patterns for dwelling density, design and amenity arising from:
 - a the pandemic experience, as well as
 - b rapid changes in technologies affecting patterns of employment and modes of transport, among other potential factors;
- viii equity and adequacy of proposed social infrastructure (including public open space, private open space, recreational space, community facility space) for a dense population among which there will be a high proportion

² <https://www.planning.nsw.gov.au/Plans-for-your-area/Local-Planning-and-Zoning/Making-and-Amending-LEPs>

of residents at home at any one time, either because they are unemployed or because they frequently work from home.

The fact that I can identify eight major missing social impact considerations is a significant indicator of inadequacy. The project seems to be based on old planning memes (e.g. workers will travel to work by train; housing shortages are best met by small dwellings in tall towers on small footprints). These memes never held up under scrutiny, and are even less relevant in 2022. Fundamentally, this proposal is for a social environment but is inadequate in social impact terms. It is also remarkably out of date.

A high level strategic social impact assessment should consider these missing (and any other) issues in the context of:

- the history of housing in the area,
- available research findings about social housing provision and distribution,
- the current policy which renders social housing available only to people with a high level of complex needs,
- likely changes in patterns of employment and place of residence, and
- the anticipated life of the project.

As it stands, the Gateway Development Report is, in my opinion, unsupported by a valid and reliable assessment of social impacts, particularly foreseeable social risks and social change and long term distributive inequity impacts. As a result, a Social Impact Assessment should be undertaken by the Planning Proposal Authority to address these major shortcomings before a decision on the application is made.



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