

# Waterloo South Planning Proposal

Public Exhibition Submission

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## Who We Are

Vigilanti is a community-led design agency with a mission to help vulnerable communities design their own visions for a better, more equitable world.

Since March 2017, when the announcement of the State government's (**the Government**) plans to redevelop the Waterloo Public Housing Estate (**the Estate**) and the dedication of the Estate as a State Significant Redevelopment Precinct, we have been supporting the Estate's public housing tenant community (**the Community**) to understand and decipher the miriade of documents released during the Visioning, Options Testing, Preferred Masterplan and Waterloo South Planning Proposal stages.

Over the last 5 years, in partnership with the Waterloo Public Housing Action Group (**WPHAG**), we have been in constant communication with the Community, including conducting workshops and information sessions separate from the Government's official consultation activities, with the intention to build capacity in the Community to understand and interpret the plans for the future of their homes and better advocate for their needs so that it can be considered and incorporated into the Government's plans.

As a NSW registered Architectural practice, we have provided our expertise pro-bono to educate the community and, in that time, have gathered first-person accounts and feedback on how they would like to see their homes redeveloped in a fair and equitable manner.

Our submission is written with the lens of continuing to advocate for the changes that the Community has asked for throughout redevelopment consultation process, and translating them into recommendations that can be actioned into the Planning Proposal, to ensure the Estate is planned in an equitable manner that considers the needs of the Estate's vulnerable public housing residents.

## Summary of Recommendations

### 1. Housing Mix

1. Social Housing should make up **AT LEAST 30%** of total residential floor area, inclusive of existing private housing floor space, to ensure a balanced mix between social, affordable and private housing residents to realise the government's public promise to the community and create a truly mixed and diverse community, not one dominated by private dwellings residents and potentially expose vulnerable public housing residents to discrimination.
2. Allocate a minimum of 82,365 sqm of residential floor area for the provision of Social Housing, to ensure no loss to the existing amount of public housing floor area in Waterloo South.
3. Correct the proposed amendment to Sydney LEP 2012 (15)a Site Specific Objectives from "ensure a balanced mix of social and affordable housing and other housing" to "to prioritise the delivery of social and affordable housing, balanced with the provision of market housing"

### 2. Built Form & Density

1. Reduce the overall density target for the redevelopment, and redesign the planning proposal with a level of density and urban design that will meet the stated objective of providing high levels of amenity for residents and tenants, to the public domain and to open space.
2. Increase the area of land allocated to green open space to adequately service the projected population growth in the area from the redevelopment.
3. Reconduct the studies based on an up-to-date planning proposal that captures the reality of the impacts and risks of the resulting development, in particular the Urban Design study and Wind Report, and include the assessment of impacts on surrounding streets, dwellings and green spaces.

4. The planning proposal itself should result in a high amenity and low impact development, and should not rely on potential solutions that may or may not eventuate through a Design Excellence Process.

### **3. Parking Allocation**

1. Include a provision in the Sydney LEP 2012 that parking spaces must be equitably allocated based on the proportion of private, affordable and social housing in any development application with a shared car park.

### **4. Impacts of Future Developments**

1. All studies should be conducted based on a planning proposal for the entire Waterloo Estate, rather than separately for Waterloo South, Central and North, which will not adequately capture the impacts of the redevelopment of Waterloo Estate in its entirety.
2. If a separate planning proposal is still to be submitted for Waterloo South, estimates and allowances for the risks and impacts of the future redevelopment of Waterloo Central and North, and the resulting increase in dwellings numbers, population, traffic loads, and other risks should be included in the studies. The planning proposal should outline how future developments have been considered and addressed.

## Key Concerns

### 1. Housing Mix

The second stated objective of the planning proposal (page 29) is:

“to prioritise the delivery of social and affordable housing, balanced with the provision of market housing;”

There is a discrepancy between the Stated Objectives of the Planning Proposal, and the wording of 4.1.1 Intent of Planning Proposal (page 31) which states a site specific objective of:

“ensure a balanced mix of social and affordable housing and other housing”

This should be corrected to mirror the stated objective of the Planning proposal.

The differences in wording reflects the fact that the provision of social and affordable housing has been deprioritised over the provision of private housing in the Planning Proposal.

Throughout the redevelopment consultation process, the community has been publicly promised that the final outcome of the redevelopment will be 65% Private Housing, 5% Affordable Housing and 30% Social Housing, as quoted in the following documents released by the Government:

“A mix of housing targeting 30% social housing and at least 5% affordable housing” Waterloo Redevelopment Options Booklet pg. 5-8 (August 2018) & Options Testing Panels Option 1-3 (October 2018)

“There will be no loss of social housing. The redevelopment will deliver more and better social housing to the area.” Waterloo Redevelopment Options Booklet pg. 4 (August 2018) & Preferred Masterplan Booklet pg. 6 (January 2019)

For the last 5 years, the community has been assured and reassured that 30% of housing will be comprised of social housing dwellings, as well as a no loss of public housing (as social housing) and amenity. This was a key promise to the Community representing:

- There would be no loss of public housing after the redevelopment and that there would be enough housing so that every household has a right to return with no loss of amenity.
- They would have sufficient representation in the redeveloped Estate and not see their community dominated by private housing residents, exposing them to discrimination as a vulnerable community.
- A potential increase in social housing for any increased density to help alleviate the shortage of public housing in NSW and help provide more housing to other vulnerable households.

The planning proposal proposes private, affordable, and social housing, in terms of gross floor area (**GFA**), on LAHC owned land at a mix of 66.5% Private, 7% Affordable, 26.5% Social Housing.

As stated in the planning proposal, there are currently 120 privately owned dwellings in Waterloo South. The proposal states that “With the additional development capacity from the new controls, there is potential for 127 additional dwellings increasing total private dwellings to 247. (page 42)”, however no estimate of GFA was provided. We assume the amount of GFA on privately-owned land would need to at least double to accommodate the additional 127 dwellings.

When existing private housing dwellings, and the additional floor area on privately-owned sites are taken into consideration, the mix of GFA allocation will result in 69.8% Private Housing, 6.3% Affordable Housing, and 23.9% Social Housing after redevelopment.

## Planning Proposal Floor Space Mix

	Private Housing	Affordable Housing	Public/Social Housing	Total GFA (excluding non-residential uses)
Existing GFA	12,000 sqm	0 sqm	82,365 sqm	
Proposed GFA (LAHC- Owned Land)	145,904 sqm (66.5%)	15,358 sqm (7%)	58,142 sqm (26.5%)	219,404 sqm
Proposed GFA (Private-Owned Land)	12,000 sqm*	0 sqm**	0 sqm	12,000 sqm
Total GFA	169,904 sqm*** (69.8%)	15,358 sqm (6.3%)	58,142 sqm (23.9%)	243,404 sqm

\*minimum estimate. Actually GFA allowance not stated in planning proposal.

\*\*affordable housing contribution rates applicable to redeveloped privately-owned lots but have been excluded from the calculation as the exact amount of floor space is unclear.

\*\*\*includes existing private housing on privately-owned lots assuming all are redeveloped to maximum GFA allowance.

It can be clearly seen that the government's public promise for 30% Social Housing has not been realised and the amount of Public/Social Housing GFA will actual decrease by 30%.

This is one of the largest inner city public housing Estates and represents a large parcel of publicly owned land. The redevelopment of any public land should prioritise the provision of social and affordable housing to help relieve Sydney citizens of housing stress and take meaningful action to solve the current housing crisis.

### Based on the concerns outlined above we recommend the following changes be made to the planning proposal:

1. Social Housing should make up **AT LEAST 30%** of total residential floor area, inclusive of existing private housing floor space, to ensure a balanced mix between social, affordable and private housing residents to realise the government's public promise to the community and create a truly mixed and diverse community, not one dominated by private dwellings residents and potentially expose vulnerable public housing residents to discrimination.
2. Allocate a minimum of 82,365 sqm of residential floor area for the provision of Social Housing, to ensure no loss to the existing amount of public housing floor area in Waterloo South.
3. Correct the proposed amendment to Sydney LEP 2012 (15)a Site Specific Objectives from "ensure a balanced mix of social and affordable housing and other housing" to "to prioritise the delivery of social and affordable housing, balanced with the provision of market housing"

We propose the following floor space allocation that would action the government's promises and meaningfully increase housing affordability in Waterloo South.

### Our Proposed Floor Space Mix

	Private Housing	Affordable Housing	Public/Social Housing	Total GFA (excluding non-residential uses)
Existing GFA	12,000 sqm	0 sqm	82,365 sqm	
Proposed GFA (LAHC- Owned Land)	109,702 sqm (50%)	27,337 sqm (12.5%)	82,365 sqm (37.5%)	219,404 sqm
Proposed GFA (Private-Owned Land)	12,000 sqm*	0 sqm**	0 sqm	12,000 sqm
Total GFA	133,702 sqm*** (54.9%)	27,337 sqm (11.2%)	82,365 sqm (33.8%)	243,404 sqm

## 2. Built Form & Density

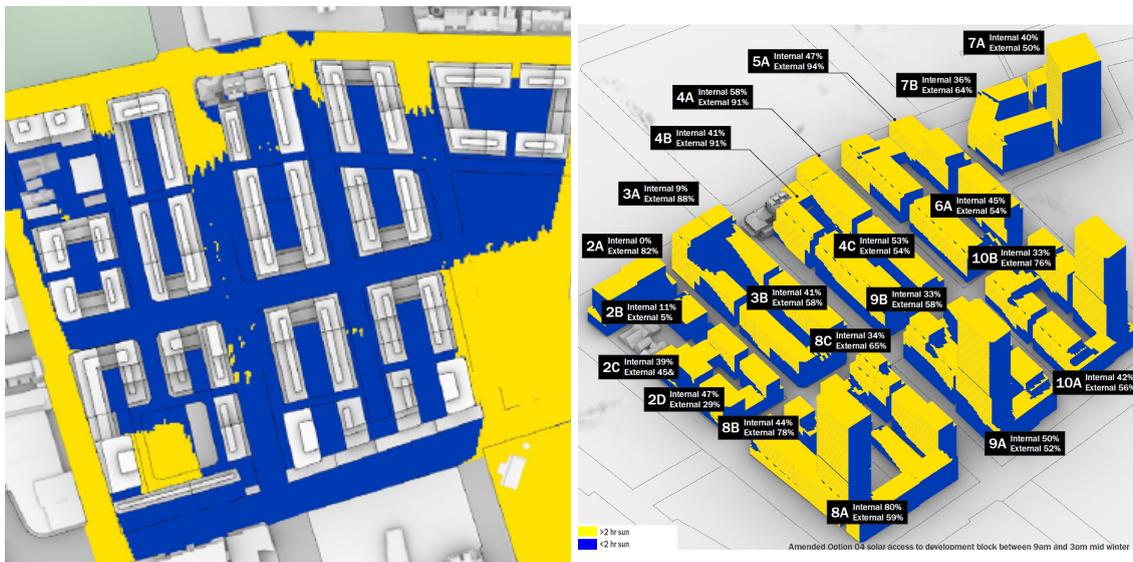
The third stated objective of the Planning Proposal (page 29) is to:

“ensure the built form provides high levels of amenity for residents and tenants, to the public domain and to open space;”

However, the accompanying studies conducted on the planning proposal highlights a number of issues that will likely result in a development would not meet this objective. All of these potential issues and risks are a result of the extremely high density proposed for the area, which the City of Sydney Council has described will be the “densest mass of development in Sydney”.

The impacts of this density as outlined in the studies include:

- Insufficient increase to public open green space (parks) to service the 375% increase in the number of dwellings (869 to 3259) and 352% increase in population in Waterloo South by 2032 (1719 to 6066 by City of Sydney’s estimates), as well as the future redevelopment of Waterloo Central and North, which have no plans to provide additional green space based on LAHC’s preferred master plan. (Social Sustainability Study)
- Insufficient access to sunlight to both residential dwellings and outdoor areas (Addendum to urban design report) with:
  - Less than 50% of internal facing units in all but one block (corner of McEvoy and Cope St) able to receive more than 2 hours of sunlight at mid winter, with one block resulting in 0% of internal units receiving direct sunlight.
  - 13 out of 20 blocks will result in less than 70% of external facing units receiving more than 2 hours of sunlight at mid winter, which is the minimum requirement of the State Environment Planning Policy 65 - Apartment Design Guide.
  - All streets will receive less than 2 hours of sunlight, resulting in cold, dark streets no conducive to a high amenity street level environment.



- Significant risk of wind conditions that are only safe for walking, and not safe for standing or sitting (Pedestrian Wind Environment Study) in the areas of:
  - The western half of the new park.
  - The new smaller park in the south west corner of Waterloo South.
  - The area around the proposed tower on the corner of Wellington & Kellick St (now Camelia Grove).

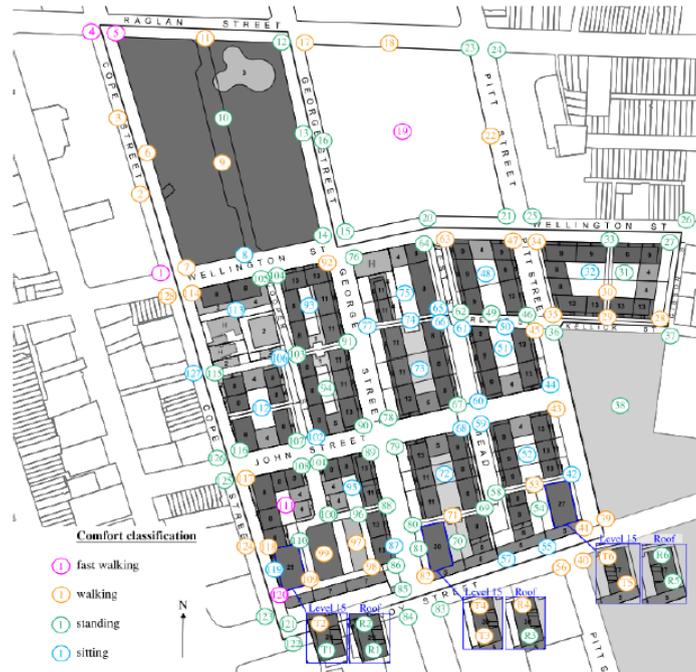


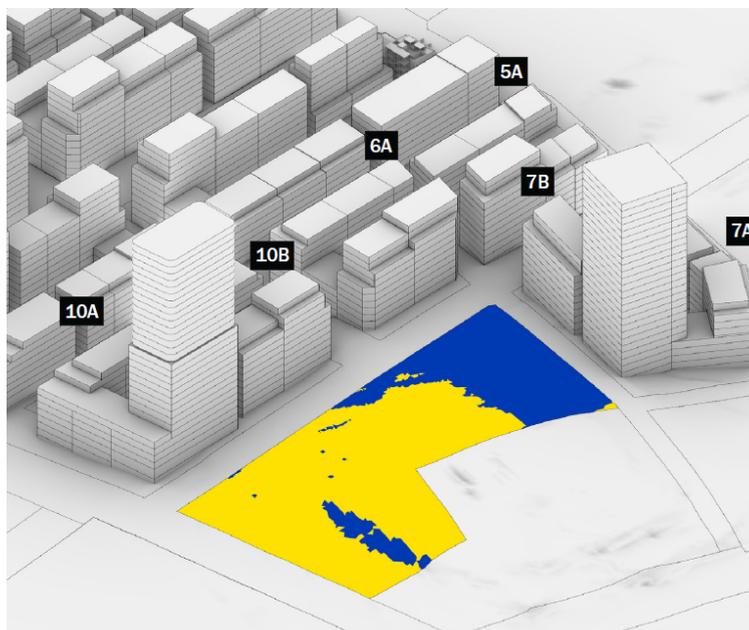
Figure 4: Summary of test locations and comfort classification

We note that there is significant inconsistency between all the studies. Some have been conducted based on the original LAHC planning proposal, some but not all were reassessed based on the City of Sydney planning proposal, none of which were conducted based on the current form of the planning proposal, in particular the Urban Design Study, which includes the solar access outcomes, and Wind Study, which outline the wind impacts.

The planning proposal itself should result in a high amenity and low impact development, rather than rely on the potential solutions to resolve these issues that may or may not eventuate through a Design Excellence Process.

Most of these issues could be easily resolved if good planning principles and reasonable density levels were the foundation to approaching the redevelopment. The planning proposal should ensure the objective of ensuring the built form provides high levels of amenity for residents and tenants, to the public domain and to open space is realised.

The impacts on surrounding areas and neighbourhoods as a result of a 300% increase in dwellings and population, increased building density, and high towers have also not been adequately assessed. The solar access and wind studies in particular have excluded assessing the impacts on surrounding areas, which will likely suffer reduced solar access to nearby dwellings, streets and green space, and potential wind impacts. 37% of Waterloo Park will already be overshadowed by the resulting tower at the corner of Kellick St. Surrounding areas may suffer similar impacts, which need to be studied and communicated to the community.



**Based on the concerns outlined above we recommend the following changes be made to the planning proposal:**

1. Reduce the overall density target for the redevelopment, and redesign the planning proposal with a level of density and urban design that will meet the stated objective of providing high levels of amenity for residents and tenants, to the public domain and to open space.
2. Increase the area of land allocated to green open space to adequately service the projected population growth in the area from the redevelopment.
3. Reconduct the studies based on an up-to-date planning proposal that captures the reality of the impacts and risks of the resulting development, in particular the Urban Design study and Wind Report, and include the assessment of impacts on surrounding streets, dwellings and green spaces.
4. The planning proposal itself should result in a high amenity and low impact development, and should not rely on potential solutions that may or may not eventuate through a Design Excellence Process.

**3. Parking Allocation**

The planning proposal proposes to apply the most restrictive parking rates in the Sydney LEP 2012 to Waterloo South. This is based on the assumption that residents will be encouraged to utilise public transport over private cars once the Waterloo Metro station is complete.

We support the encouragement of using public transport, green transport and a walkable city and the planning proposal will help to increase public transport use and walking in the city. However, the Community has often highlighted their need for private cars to attend hospital and doctor’s appointments, which can be difficult to access via public transport with physical ability limitations

Although we do not object to the application of restrictive parking rates in the planning proposal, the low amounts of parking that will be generated may result in precious and valuable parking spaces only allocated to high income private residents.

Additional provisions should be included to protect social and affordable housing resident’s rights to their proportion of parking spaces, ensure any parking spaces are allocated equitably based on the proportion of private, affordable and social housing.

In a previous submission to the Waterloo Metro Quarter OSD Development Application, we identified that parking spaces were not equitably allocated between private, affordable and social housing dwellings, with Social Housing dwellings only allocated 1 space per 8.75 dwellings, while Private and Affordable were allocated parking spaces at a rate of 1 per 2 units.

<b>Waterloo Metro OSD</b>	<b>Private Housing</b>	<b>Affordable Housing</b>	<b>Social Housing</b>	<b>Total</b>
<b>Dwellings</b>	126	24	70	220
<b>Parking Spaces</b>	55	12	8	75
<b>Spaces per Unit</b>	1 per 2.2 units	1 per 2	1 per 8.75	

**Based on the concerns outlined above we recommend the following changes be made to the planning proposal:**

1. Include a provision in the Sydney LEP 2012 that parking spaces must be equitably allocated based on the proportion of private, affordable and social housing in any development application with a shared car park.

**4. Impacts of Future Development**

Although the planning proposal and accompanying studies goes into great detail to outline the impacts of the Waterloo South redevelopment, there are key blind spots that result from not studying the redevelopment of the Estate as a whole and excluding the future redevelopment of Waterloo Central and North.

By excluding the future redevelopment of Waterloo Central and North, the studies are unable to assess:

- The total increase in population and dwelling density and whether there are adequate levels of green open space and parks to accommodate to the total population.

- City of Sydney estimates that the entire Waterloo Estate after redevelopment will result in a total population of between 10,945 & 11,542 by 2032. 4,879 to 5,476 will be a result of the future redevelopment of Waterloo Central and North.
- The Preferred Masterplan, which covers the entirety of Waterloo Estate, which the Waterloo South Planning Proposal is based on, has not allocated additional area for green open space and parks in Waterloo Central or North, meaning any allocation in Waterloo South will not only be servicing the residents of Waterloo South, but the future population of Waterloo Central and North as well.
- The potential solar access and wind impacts on the new park and Waterloo South from the future redevelopment of Waterloo Central and North. Waterloo North, in particular, lies directly north of the park and any high rise developments or towers would directly overshadow the park. A similar impact can already be seen from the proposed tower on Kellick St on Waterloo Park, which will overshadow 37% of the park at mid Winter.
- The potential increased impact on traffic loads on local roads once the entire Estate is redeveloped. The current Transport Study was conducted with only the increased dwellings from Waterloo South. The planning proposal proposes Pitt St be opened up to left-in left-out traffic to improve traffic conditions. It is unclear if additional changes to the local road network may be required to accommodate the increased traffic loads from future developments to access McEvoy St, which is a major concern for both residents of the Estate, and the surrounding area.

**Based on the concerns outlined above we recommend the following changes be made to the planning proposal:**

1. All studies should be conducted based on a planning proposal for the entire Waterloo Estate, rather than separately for Waterloo South, Central and North, which will not adequately capture the impacts of the redevelopment of Waterloo Estate in its entirety.
2. If a separate planning proposal is still to be submitted for Waterloo South, estimates and allowances for the risks and impacts of the future redevelopment of Waterloo Central and North, and the resulting increase in dwellings numbers, population, traffic loads, and other risks should be included in the studies. The planning proposal should outline how future developments have been considered and addressed.