



The Rt. Hon. The Lord Mayor of Sydney
CLOVER MOORE AO

20 APR 2026

The Hon. Rose Jackson MLC
Minister for Housing
52 Martin Place
Sydney NSW 2000

Dear Minister

Waterloo South People and Place Plan and relocation support

I write to raise serious concerns about the Waterloo South People and Place Plan (the Plan), which Homes NSW released in October 2025, and resourcing independent supports for relocations.

People and Place Plan

The City of Sydney strongly supports planning for the people and places of Waterloo South, in addition to the physical build. Careful and strategic planning is essential to ensure that the redeveloped Waterloo South will foster a strong sense of place for existing and future residents. Of the Plan's 78 recommendations, the City is nominated as a 'Lead/Co-lead' on 24 and as a 'Support' on 15.

I am concerned, however, that the final Plan does not establish clear governance, accountability or resourcing arrangements to support its implementation. Without clear governance arrangements, defined responsibilities and resourcing, the Plan risks remaining aspirational rather than delivering tangible outcomes for the Waterloo community.

Despite commitments that Homes NSW would maintain overall responsibility for the Plan's implementation, actions identified in the draft Plan have been reframed as recommendations in the final version. This significantly weakens the commitment to implementation and removes clear accountability for delivery.

Furthermore, the Plan defers critical details of its recommendations to future planning and engagement and does not clearly identify overarching responsibility for implementation. Responsibility for implementation is instead deferred to potential leads for individual recommendations. This is unjustified and concerning, given the extensive engagement and analysis already undertaken over many years, particularly in the context of resident relocations underway. Collectively, these issues create a significant risk that the Plan will not be implemented in a coordinated or accountable manner.

There are also no commitments to resourcing local community organisations, including local Aboriginal Community Controlled Organisations, to implement recommendations where they are nominated as the Lead or Support. The City raised these issues, among others, in our

submission on the draft Plan, many of which Homes NSW has not addressed. I enclose a copy of the City's submission, and a comparative analysis of the final Plan against the recommendations outlined in our submission.

Given the concept State Significant Development application is expected imminently, we need certainty that social outcomes are embedded alongside built form outcomes as planning progresses.

I ask you to ensure that Homes NSW:

- ***Urgently resolves the City's concerns with the Plan, including by providing an implementation plan underpinned by clear leadership and governance, with defined responsibilities, timeframes and reporting mechanisms***
- ***Resources independent local services and community organisations to support delivery of the Plan's recommendations, including local Aboriginal Community Controlled Organisations to ensure culturally appropriate support.***

Relocation support

Stage 2 of the relocations has already begun, and it is expected to be more complex because of a lack of available local social housing stock. Residents are concerned about the timing of the Stage 2 relocations and unsure about where they will be moved to.

Acknowledging the impacts of relocations, the City is providing \$50,000 in cash funding each year for three years to Redfern Legal Centre, Counterpoint Community Services and Kinchela Boys Home Aboriginal Corporation to provide relocation support for residents. The City's support will total \$450,000 over three years.

I commend Homes NSW for seeing the importance of funding local independent support to help tenants and the broader community understand and navigate relocations. Homes NSW has funded a tenant advocate at Redfern Legal Centre and supported the resourcing of a community development worker at Counterpoint Community Services.

However, I was disappointed to learn the funding for Redfern Legal Centre ended in March 2026, and resourcing the community development position at Counterpoint ends in June 2026. These positions are crucial in supporting the community during the redevelopment and they must remain stable. Homes NSW recently recommitted to funding further support at the Waterloo Redevelopment Group meeting on 15 April 2026.

I call on the NSW Government to:

- ***Confirm continued funding of the tenant advocate at Redfern Legal Centre and the community development worker at Counterpoint Community Services***
- ***Provide a clear plan for residents impacted by Stage 2 relocations to stay in the local area, informed by lessons learnt from Stage 1***
- ***Ensure that the Homes NSW Relocations Team works with City-funded organisations providing relocations support services to ensure service coordination and appropriate referral pathways for impacted residents.***

Any review of resourcing these crucial independent supports should be done in consultation with tenants and stakeholders.

If your staff would like to contact my office about this issue, they can contact Pamela Aleixo, Senior Policy Officer, on 02 9265 9229 or at paleixo@cityofsydney.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink that reads "Clover Moore". The signature is written in a cursive, flowing style. A long, horizontal flourish extends from the bottom of the signature to the right.

Clover Moore AO
Lord Mayor of Sydney

Encl.

Homes NSW – Waterloo South People and Place Plan

Comparative Analysis of City of Sydney Recommendations

Purpose

This document provides an analysis of how Homes NSW has responded in the final Waterloo South People and Place Plan (the Plan) to the recommendations outlined in the City of Sydney's submission of June 2024 on the draft Plan. The analysis identifies recommendations accepted, accepted in part or not accepted.

Background

In June 2024, Homes NSW invited feedback to the draft Plan and the City made a submission which included 41 recommendations.

Homes NSW released the final Plan in October 2025 which summarises recommendations from previous reports and engagement that aim to:

- Create a place that supports the health and wellbeing of all tenants, now and in the future
 - Sensitively manage the impacts of renewal on existing tenants
 - Build on and bring together the wide range of engagement, analysis and planning previously undertaken as part of the Waterloo Renewal Project
 - Provide clarity about the services, programs and infrastructure which are recommended to support the Waterloo community.
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Analysis

Below is a detailed analysis of the City's recommendations on the draft Plan and how they have or have not been addressed in the final Plan.

Comparative Analysis of City of Sydney Recommendations

City of Sydney Recommendation	Accepted	Comment
General feedback		
1. Include affordability as a seventh objective and explain how affordability will be assured across programs and services.	No	Whilst there are references to affordability throughout the Plan, affordability has not been identified as a separate objective or is there any mechanism to ensure affordability across programs and services.
2. Acknowledge and plan for the health and wellbeing needs of the private residents that will reside in Waterloo South, namely private renters and owner-occupiers with a mortgage.	In part	Partially addressed through general resident-focused programs (5.1-5.2), however the Plan does not outline how the health and wellbeing needs of private renters and owners will be planned for and delivered.
3. Include specific governance arrangements regarding how and under what circumstances the plan may be changed.	No	The Plan notes recommendations may 'evolve' but provides no governance mechanism or criteria for making changes to respond to emerging needs and/or issues.
4. Make explicit what is meant by 'better social housing'.	No	'High-quality' is the only additional descriptor used in the Plan.
5. Include a clear description of how the plan relates to the existing Human Services Action Plan, and what mechanism will be used to ensure coordination between both plans.	In part	Whilst conceptual references are made to the Human Services Action Plan, the operational relationship and coordination mechanism between the two plans is not articulated. The plan states that it has been informed by the consultation and research within the Human Services Action Plan.
6. The Plan is provided in an Easy English version when it is published.	No	
7. Including a point of contact, including on the website, so that members of the public can advise of any accessibility requirements not met by the final document.	Yes	"Waterloo Connect" contact details (address, phone, email) included.

Pillar 1 – Working together

Comparative Analysis of City of Sydney Recommendations

City of Sydney Recommendation	Accepted	Comment
8. Detail how local community organisations are expected to lead and support actions will be appropriately resourced.	No	Responsibilities are assigned however there is no provision included for resourcing and/or funding arrangements.
9. Articulate Homes NSW's overarching accountability for all the actions within the plan and describe Homes NSW's role in ensuring stakeholders deliver on their obligations.	No	Only notes that the Plan will be implemented by the NSW Government, in partnership with the renewal partner and others.
10. Detail how risks to delivery can be mitigated and addressed.	No	
11. Ministerial endorsement of the Plan.	No	
12. Include the CHP as co-leading placemaking in operations with the City.	No	CHPs are included as contributors in the delivery stage only.
13. Include a definition of placemaking, and an understanding of the precinct governance arrangements that will guide the renewal partners as they lead placemaking in the delivery stage.	No	The Plan does not define placemaking or outline precinct governance arrangements.
14. Acknowledge the expected fragmentation and outline how it will support well-resourced inclusive tenant participation structures and programs to facilitate a socially cohesive and connected community and provide opportunities and forums for all residents to come together and address local issues.	In part	Partially addressed through commitments to tenant participation structures (1.4), but fragmentation is not acknowledged and detail on resourcing is unclear.
15. Include a clear commitment to ongoing consultation and engagement with Waterloo social housing residents about the plan, including obligations to codesign activities that will arise from the plan, and the resourcing of tenant-led projects.	In part	Partially addressed through broad commitments to engagement (1.1-1.6) and codesign with First Nations community (3.2) but no commitment to resourcing tenant-led projects.

Pillar 2 – Working with social housing tenants

Comparative Analysis of City of Sydney Recommendations

City of Sydney Recommendation	Accepted	Comment
16. Include undertakings that Homes NSW and its consortium partners will operate within the Waterloo Renewal Principles and any state-level compact that might be adopted.	In part	Partially addressed through acknowledgement of the Principles, but no undertaking to operate within them is provided.
17. Ensure that communication materials are provided in Easy English to meet the needs of people with intellectual disability and those with low literacy.	In part	Partially addressed through accessible communication commitments (2.1), but Easy English is not specified.
18. Ensure that alternative communication formats be available upon request, including Braille, Auslan video, captioned video, audio, accessible Word and PDF documents.	No	
19. Ensure that the 'right to return' is included in relocation letters.	No	The right to return is affirmed (2.7) but not linked to relocation letters.
20. That the 'right to return' is not conditioned on the availability of appropriate housing or subject to 'eligibility' as per previous written communications but is universal.	In part	Partially addressed as no conditions or eligibility requirements are stated, but universality is not explicitly guaranteed.
21. Include how affordable housing will be allocated, including safeguards to ensure affordable housing is allocated to all income bands, not just the highest.	In part	Partially addressed through commitment to develop a local allocations strategy (2.12), but income band safeguards are not included.
Pillar 3 – Working with the Aboriginal community		
22. Ensure appropriate resourcing of local Aboriginal community-controlled organisations to facilitate ongoing participation and consultation and establish mechanisms to include representatives from the local Aboriginal and Torres Strait Islander communities in governance structures so they are included in decision making.	In part	Partially addressed through support (3.10-3.11) and engagement commitments (3.1-3.2) but no specific resourcing or governance mechanisms are provided.

Comparative Analysis of City of Sydney Recommendations

City of Sydney Recommendation	Accepted	Comment
23. Align the delivery of actions 3.13- 3.15 to the City's Eora Journey Economic Development Plan to support these outcomes.	In part	The Plan acknowledges and supports the vision of the City's Eora Journey Economic Development Plan but lacks alignment to specific actions.
24. Acknowledge the historical practice of designing Aboriginal communities out of spaces, and the plan must maintain, protect and create 'culturally safe' places where the Aboriginal community can gather, feel comfortable and safe, and not be priced or designed out.	Yes	Addressed through actions providing cultural space and visibility (3.5-3.6), although historical displacement is not expressly mentioned.
25. Strengthen the recognition of Aboriginal controlled organisations and their history in the area and include a commitment to foster strong partnerships with local Aboriginal-controlled organisations.	Yes	The Plan recognises local organisations and articulates a partnership intent.
Pillar 4 – Supporting health and wellbeing		
26. Avoid using suburb-wide data derived from the ABS 2021 Census to understand the wellbeing of Waterloo social housing residents. Instead, use more nuanced data sources, such as that SEIFA disadvantage index data for statistical area 1 areas that are primarily home to Waterloo social housing residents.	Yes	
27. Provide greater clarity on how affordable health services can be delivered in Waterloo without the Health One facility or additional funding.	In part	Partially addressed through commitments to providing space for service provision (4.6) but no commitments to affordability.
28. Acknowledge and plan for the impacts of dense high-rise living for priority cohorts, along with the tensions that may arise from social mix.	In part	Partially addressed through related safety and wellbeing actions (4.3 and 6.5–6.10) but impacts of high-rise living are not explicitly acknowledged.

Comparative Analysis of City of Sydney Recommendations

City of Sydney Recommendation	Accepted	Comment
Pillar 5 – Accessing quality education, learning and jobs		
29. Ensure all social and affordable dwellings are connected to the NBN upon completion.	In part	Partially addressed through a commitment to affordable digital connectivity (5.8), but no requirement for pre-connection to the NBN.
30. Ensure any embedded networks are not allowed to act in a monopolistic way.	No	
31. Provide free or discounted internet access in social housing is considered.	In part	Partially addressed through publicly accessible computers and digital access, digital literacy and upskilling programs (5.7) and reliable and affordable digital connectivity for residents (5.8).
32. Commit to providing free Wi-Fi in the public domain to guarantee digital access for all Waterloo residents, given the documented existing digital divide.	No	
Pillar 6 – Feeling safe and welcome		
33. Consider the City’s Inclusive and Accessible Public Domain Policy and Guidelines, specifically around ‘Construction activity’ on page 84 in relation to the design and management of public spaces, including during construction.	In part	Relevant City policies are acknowledged and supported, such as the City’s Accessible Public Domain Policy and Guidelines, but is not included as a specific action. The Plan commits to accessibility (6.7).
34. Ensure that wayfinding signage in public spaces and facilities aligns with the City’s Inclusive and Accessible Public Domain Policy and Guidelines and Wayfinding Strategy.	In part	Partially addressed through inclusive signage commitments (6.6) but no explicit alignment with the City’s Wayfinding strategy.
35. Elaborates the comment that ‘Waterloo is a diverse community, home to people from a wide range of	In part	Partially addressed through broad inclusion language (6.4), but sexual and gender diversity is not referenced.

Comparative Analysis of City of Sydney Recommendations

City of Sydney Recommendation	Accepted	Comment
backgrounds' to include people of diverse sexualities and genders, ages, abilities and incomes.		
36. Include the City as a joint lead in the preparation of a welcome pack for new residents	No	
Pillar 7 – Being green and clean		
37. Prioritise ground-level community gardens (not relying on rooftop gardens).	No	Only rooftop gardens are mentioned (7.3).
38. Consider circular economy principles in the selection of building products so that building materials chosen are ones designed for reusing, repairing, and refurbishing before they need to be recycled.	In part	Partially addressed through commitments to sustainable materials (7.3), but principles of reuse, repair and refurbishment are not specified.
39. Ensures recycled water facilities are developed in Waterloo to provide recycled water to community facilities and public green spaces as well as individual homes.	No	The Plan commits to water-efficient homes (7.7), but recycled water infrastructure is not mentioned.
40. Ensures social housing dwellings have access to both mechanical cooling and heating devices such as ceiling fans or reverse air conditioning and heating, not just natural ventilation.	In part	Partially addressed through commitments to natural ventilation and economical heating (7.8), but no commitments to mechanical cooling/heating.
41. Commit to consultation with people with disability and social housing residents to ensure waste management and recycling systems are accessible and are understood by diverse groups, and to apply learnings to the design of bin bay areas in Waterloo South.	In part	Partially addressed through consideration of diverse needs (7.10), but consultation requirements are not included.