



16 February 2011

Dear Roy and team,

Thank you for the opportunity to comment on your exhibition of the Draft Built Environment Plan Phase 2.

First of all we want to congratulate your team, Housing NSW and others on the volume of work undertaken that has taken us to this stage of the process. We are aware of the challenges and complexities in such an important and significant exercise, and we are sure it was no easy task that which your teams have undertaken.

Over the course of the last few weeks, we have spoken to range of residents and agencies on BE2 and had some lively debates. We have written the attached submission comments for your consideration.

The comments are based on our conversation with the community (both formal and informal), our staff team's experience of working and living this community, and other communities in which we have seen regeneration projects of this type implemented.

We have also had the opportunity input to other group's forthcoming submissions including Redwatch and Shelter, which would have our broad support. Therefore our comments within this letter are ones we feel we wanted to emphasize further.

We haven't commented much on the technical aspects of this process (height and floor ratios etc.) as we do not feel we have the expertise or capacity to do so and there others who are better placed to comment.

We hope you take our points with in the spirit in which they are intended, and we look forward to working with you and the other stakeholders positively to maximise the potential benefits to the wider community.

Should you need any points clarified, please feel free to contact me,

Yours Sincerely,

Mike Shreenan

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Executive officer

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Consultation / Community awareness

- Appears to be an insufficient capacity for residents both public/private and local agencies which is affecting the community ability to comment on the proposal on informed bases. When a community is experiencing low capacity, it will be difficult to involve residents in meaningful decision-making. When regeneration initiatives are being set-up in circumstances where communities don't own the solutions to their challenges usually you will find that these initiatives had experienced great problems and eventually fail and with this failure we waste an important number of resources.
- We accept that a valiant effort has been undertaken to facilitate and encourage an open dialogue with/in the community, probably more than other planning exhibitions, however given the nature of this community we consider the time frame and limits for feedback are unreasonably short, given the importance and significance of the project to the social impact of the community.
- There has been no 'consultation' with possible future demographic population. For example: People on waiting list for social housing. In addition, there is no study into the projected future demographics or needs, and there is no social impact analysis of this proposal.
- The 'justification' data utilised is dated and the demographics of the whole geographic area of Redfern/ Waterloo have changed significantly since the last census. It is also worth noting that the census uptake within social housing is generally low therefore does not form an accurate overview to base decisions on.
- Appears to be no soft data. For example: What does it mean to be a single mother living in a high-rise flat with chaotic and disruptive neighbours? Or to be an elderly man who is isolated, lonely and feels his community has or is about to be changed beyond recognition? Frequently soft data is overlooked for more tangible data, yet it often gives a greater insight to the underlying cause of entrenched social deprivation rather than purely focusing on the measurable effects of the current state of public assets, and crime levels etc. Recurrently in regeneration processes the emotional element, such as attitude, mindset, complex relationship problems, inherited poverty, belief systems and the underlying causes are often overlooked.
- The process /plan does not take into account the current wider demographics of the area, (including Development's that have happened since 2006 such as Green Square/and Lachlan Street Meriton Complex) or other developments which are due to be implemented in the near future, projects that for them self will increase

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the density variable, over and above the projected increase within the draft BE2 plan.

- There has been no 'independent' consultation undertaken during the BE2 exhibition process that we are aware of.
- It has been commented on by many that the exhibition material including newsletters, flyers and websites were not designed in a satisfactory manner where the process and plans were clearly explained to the community or in a style which they could comprehend or access the information easily, making the communication channel inadequate.
- Appears to be a high number of the affected population completely unaware of what BE2 is, never mind its significance.

Social Mix

- There is no significant data from other similar developments within the NSW State or other countries to evidence that social mix has proven to work.
- The plan talks about facilitating and providing Social Mix, with no evidence that social mix will have any greater positive impact on the community.
- The Plan fails to show the current and existing Social mix within the whole collective geographic area of Redfern/ Waterloo.
- UK Governments since the early 1990s have also encouraged "mixed tenure" in regeneration areas and a number of recent research reports have argued that the evidence base for tenure mixing remains unclear.
- It is perceived by us that the Social Mix argument, is being used, for the justification of the sale of limited, yet valuable public land, to private developers, for short term monetary gain to subsidise the upgrade of current poor social housing stock. There is also no public final commitment/plan on how the upgraded stock will be maintained in the future. Therefore we are concerned that the plan is not a sustainable option for future public housing provision.
- The reduction of current stock, and the reduction of land that Housing NSW will own at the end of this process, understanding that 45,000 people are currently on waiting list for public housing, is alarming and illogical. We would suggest that if Housing NSW was to retain the land and utilise private stock for rental income this would have been a longer term sustainable option for income generation.

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- There is some evidence to suggest that private residents tend to be less participative and engaged with the community in the immediate residential area than social housing tenants, and therefore this proposed Social Mix has the potential to make the community less social cohesive. Our concern as social advocates is that this strategy could possibly lead to an increase of social isolation, greater hidden poverty, than what currently exists in the area.
- It' is difficult for us to comment on the possible consequences of the population increase that will come with this plan, with no future demographics projected, or details of the expected population increase from other developments in the wider area.
- The partition 60/40 Ratio of the proposed Social Mix is a big concern to us, as the ratio appears inequitable. We consider that **if** the plan truly and responsibly contemplates this attempt to create social mix, then we would support the idea that no single tenure type should be greater than 50%. We also feel the ratio should be based on the population of the entire area, not just the Housing NSW current operational areas.

New Build/ Renovation

- The renovation of existing dilapidated stocks is welcomed
- The provision of affordable housing is welcome, but not at the expense of reducing current stock levels in the existing area.
- The provision of better and mixed commercial development within the housing estate is welcomed; we would encourage some of the commercial development to be social enterprise based, to support the work of local small NGO's
- The importance placed on community green space is welcomed, but the draft plan fails to define where or how much this will be.
- The likelihood of property investors being high, and the subsequent consequence of increased short term leasing of the private market units concerns us and the negative affect this may have in building a cohesive community.
- The maximum height of buildings hasn't been made clear and possibly misleading in some of the briefing material distributed.

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Traffic Study

- We feel that the Traffic study of the area, does not match the reality or the perception of local residents, both private and public.
- There is high number of complaints in relation to the lack of parking – generally caused by City commuters abusing Housing NSW parking sites. There is a lack of parking, both for workers in the area and for those Customers trying to access Redfern/Waterloo Business precincts.
- Public transport - frequency, reliability and accessibility - has been muted as a concern by many, while we welcome the upgrade of Redfern Station, we do not see how the current upgrade plan will assist with higher number of commuters. Also there are currently no link buses within the Railway Station and the wider geographic area, which is one the mayor concerns for elderly / disabled residents with mobility challenges.
- Some traffic delays on the surround main traffic flows are significantly high during peak hours and weekends. South Dowling Street, Elizabeth Street, and Botany Road, is of major concern and growing frustration.
- The average speed and delay figures detailed in the report appear questionable.

Community Facilities/ Services

- The review of community facilities are welcomed, but needs to be match with a human services review of current provision and resources given the possible increase in demand of services both for existing and in the future once population increases. We also note that very few services are currently in a position to service those in private tenure currently without even looking at the future increase.
- The equality of the funding of employee positions within NGO's in compression of the Government sector, and the lack of security of employment should also be looked as part of any review.
- We are concerned that the area is currently under-serviced in relation to the public domain green space, and we also are concerned that this will be exacerbated with the increase of population.
- The Factory Community Centre is currently out growing it's current space, demand for meeting space and service provision space continues to rise.

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- The Factory Community Centre is concerned about the probable loss of funding for the Community Development Worker under the Housing Communities Programme, and would argue for this position to be made recurrent to support the community through this long-term process as independent provider.
- We are concerned about the local schools capacity to cope with likely increase in children and young people within the area

Housing Management

- We are concerned about the possible hand over of the management of property to 'Community Housing Providers' of the current stock and the lack of details of this strategy. The probable positive or negative impacts and how it relates to this plan have not been studied/ released.
- Also we are concerned about the non-release of the outstanding RWA affordable housing strategy and how this document will relates to this plan.
- We are concerned about the lack of commitment from all Government parties in relation to the funding of the maintenance of any new and existing stock in the area.
- Currently is noticeable where the social mix has occurred in the Waterloo area, in particular Lenton Parade and top end of Raglan Street the strategy has provoke more anti-social problems not less. We also noted recently that were Public Housing in the area received a welcome paint over, private residents did not. The result of the same paint been used for all public housing blocks made those units more recognisable as public v's private, making the division stronger.
- We are concerned that private residents may not be as tolerant of those with chaotic lifestyle, substance misuse and or mental ill health for example as the current Social housing residents are. This may lead to greater social tension.
- We concerned that private tenants may bring an increase of anti-social behavior to the area rather than less, given they have more disposable income and students demographic is likely to rent properties are probably more likely to cause noise and nuisance than the existing social housing tenants.

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