

Submission on the draft Redfern–Waterloo Built Environment Plan Stage 2

To the Redfern–Waterloo Authority
From Shelter NSW

THIS SUBMISSION IS A RESPONSE TO THE REDFERN–WATERLOO BUILT ENVIRONMENT PLAN – STAGE 2, RELEASED BY THE AUTHORITY ON JANUARY 27, AND THE AUTHORITY’S INVITATION TO COMMENT ON IT.

1. Objects of the Redfern–Waterloo Authority Act

The draft ‘Redfern–Waterloo Built Environment Plan stage 2’ is an instrument for achieving the objects of the *Redfern–Waterloo Authority Act 2004*. The first object of the Act is ‘to encourage the development of Redfern –Waterloo into an active, vibrant and sustainable community’ (section 3(a)). The draft Plan fails the test of advancing this object in that it pays scant attention to the rest of the Redfern–Waterloo Authority (RWA) remit when proposing the planning controls for the social housing sites. This failure draws into question the usefulness of the draft Plan as a whole for achieving the stated objects of the Act. Any plan for the urban renewal of the urban precinct for which the Authority has responsibility should consider the mix of tenure types across the whole of the precinct when seeking to arrive at a balance between nonmarket and private housing. If the remaining 56% of dwellings are all private, or a mix of private and nonmarket intermediate housing, and if there is no evidence that this mix has proved problematic socially or economically, then particularizing the social housing sites to a split of 40% social housing to 60% private housing and ‘affordable housing’, as the draft Plan proposes, seems arbitrary at best.

2. State Environmental Planning Policy (Urban Renewal) and the Sydney Metropolitan Strategy

The stated purpose of the draft Plan is ‘to obtain community feedback on proposals to provide a socially and economically responsible vision to lead the transformation of the Housing NSW social housing within the RWA operational area over a 20-35 year time frame’. It seeks to do this in part within the recent identification of the Redfern–Waterloo Authority’s operational area as an urban renewal precinct under the *State Environmental Planning Policy (Urban Renewal) 2010*.

One of the aims of this SEPP is ‘to facilitate delivery of the objectives of any applicable government State, regional or *metropolitan strategies* connected with the renewal of urban areas that are accessible by public transport’. The SEPP therefore is there to facilitate the delivery, under the Sydney Metropolitan Strategy, of a target of 61,000 new dwellings in the Sydney City subregion; the draft Plan is an instrument to achieve part of this target within the Redfern–Waterloo area.

It is this densification driver that leads to the draft Plan aiming to provide 2,800 social housing dwellings, 700 ‘affordable housing’ dwellings and 3,500 private dwellings,

a total of 7,000 dwellings in a land area that presently supports only 3,500 dwellings. That is, the draft Plan proposes to double the number of dwellings in the limited land area of the consolidated social housing sites of Redfern and Waterloo.

The draft Plan does not identify:

- what overall increase in dwellings across the whole precinct is proposed, and hence what proportion of these is being borne by the social housing site renewal;
- why a doubling of the existing site capacity is considered appropriate; or
- why the increase in capacity should be in the ratio 40% social housing to 60% private and intermediate housing rather than some other ratio – though we note that the proposed ratio is more ‘generous’ to social housing than the 30:70 ratio that has been applied in other recent social housing renewal projects in the Sydney metropolitan area.

3. Social housing

The draft Plan identifies that currently there are 4,300 social housing dwellings within the operational area of the Authority. Of these:

- 3,500 are on the two sites covered by the draft Plan.
- 520 are located in the Waterloo Conservation Area.
- 100 are within South Eveleigh.
- The rest are scattered throughout Redfern, East Redfern, Darlington and Chippendale.

The objective of the draft Plan is to significantly impact on the number of dwellings in the two targeted sites in two ways:

- Reducing the number of social housing dwellings by 700 to 2,800; that is, a 20% reduction.
- Increasing the total number of dwellings on the two sites to 7,000, of which only 40% will be social housing.

The draft Plan argues that there will be no absolute loss in the number of social housing dwelling, with the 700 dwellings lost in Redfern–Waterloo to be found elsewhere in the City of Sydney. We are skeptical that this outcome can be achieved. Substantial parts of the City of Sydney are undergoing the same kind of densification that is the driver in Redfern–Waterloo and it is highly unlikely that even over the proposed timeframe of 20-25 years, relocation to suitable dwellings within the City of Sydney will be possible. We oppose any net loss of social housing from the Redfern–Waterloo consolidated sites. Our reasons are:

- Developers of recent large developments have resisted the inclusion of intermediate housing on site, e.g. Carlton United Brewery site (Chippendale). If intermediate housing is resisted by developers we find it hard to imagine that future developments will include social housing.
- Public land in the City of Sydney available for new social housing is limited.
- Promises of this nature are impossible to track.

We also question the financial costs involved in replacing public housing. Typically when this process has been undertaken in other social housing estates, Housing NSW has paid three times as much to purchase a suitable dwelling to relocate a resident as it

gets from the sale of the resident's dwelling. This is because generally an increase in value occurs once the property has passed from public to private ownership.

As far as we are aware, there has been no study to date on the impact of the existing residents and community in the social housing sites of a doubling of the population and of a skewing of the population to possibly wealthier private homeowners and renters. We ask what would be the response if a State authority in some other area produced a plan to double the density of a predominantly private dwelling precinct by building only, or mostly, social housing and had not undertaken appropriate consultations and impact studies prior to determining the mix.

4. Relocation of social housing tenants

The draft Plan is silent on how the relocation of social housing tenants will be managed. We put the following questions to the Authority and Housing NSW.

In the event that tenants are asked to move:

- Will tenants be rehoused in an area of their choosing?
- Will tenants have associated costs such as utility connections paid upfront?
- Will improvements undertaken by tenants be recognised and compensation negotiated?
- Will tenants retain their tenancy status under any new agreement?
- Will additional occupants in the present housing be recognised and housed in the new tenancy?
- Will neighbours who chose to, be relocated in close proximity, so that they can continue their long term connections and mutual support?
- Will the relocation process be sensitive to family connections and support?
- Will culturally appropriate support will be provided to tenants facing grief at the loss of their homes?
- Will trained resettlement officers assist in resolving problems that arise from relocation? Tenants might be fearful of being settled in a neighbourhood where they are not wanted and are isolated from friends and support. Will Housing NSW officers have the flexibility to find creative ways of dealing with this in consultation with the tenants themselves?
- Will agreements with tenants be in writing?

5. Intermediate housing

The draft Plan proposes that of the 4,200 new dwellings, 700 will be targeted for 'affordable housing' – the same number as will be lost in the area to social housing. While there is an overlap between social housing and 'affordable housing' tenants, 'affordable housing' allows for a broader range of incomes and, in accommodating moderate income and low income households, rather than very low income households only, it is a mechanism for social mix.

Why set a target of only 700 out of 4,200 new dwelling, i.e. approximately 17%. There is no justification in the draft Plan for this figure. There might, indeed, be a case for a higher proportion (and greater number) of nonmarket intermediate housing in the new dwellings and a consequential reduction of the proportion for private owner-occupation and private rental.

The need to retain and indeed to increase affordable housing in the operational area of the Authority is recognised in the 'Redfern–Waterloo Authority Affordable Housing Contributions Plan 2006'. That Plan states:

The population in the Operational Area has been traditionally characterised by diverse socio-economic groups with a predominance of low and moderate income households aligned with the area's industrial past. Since the 1980's the Operational Area has experienced rapid gentrification which has had a polarising effect on the community and has led to the creation of pockets of disadvantage and advantage. This has resulted in a loss of low cost private housing as rents and house prices have increased. Despite the fact that 1996 to 2001 was a period of significant growth in housing stock there was a real decline in the proportion of dwellings that could be affordably purchased or rented by very low, low and moderate income households in the Operational Area and South Sydney generally.

In each of the years 1996-2006, none of the dwellings which were for sale in the preceding year in the postcode areas of 2008, 2016 and 2017 were priced such that they could be purchased by very low income households. The proportion which could be purchased by low income households fell from 5.1% in 1996 to 0.2% in 2006. The proportion which could be purchased by moderate income households fell from 31.7% in 1996 to 9.2% in 2006.

In relation to private rental accommodation, the proportion of dwellings which could be affordably rented by very low income households fell from 4% in March 1996 to 1.2% in March 2006. The proportion of dwellings which could be affordably rented by low income households fell from 16.9% in March 1996 to 11.4 % in March 2006. Only 68% of all dwellings could be affordably rented by moderate income households in March 2006. There is intense competition for lower cost rental stock. So even though rental affordability may appear to be high for moderate income households, they will have to compete with higher income households for the same stock. Recent research from the Australian Housing and Urban Research Institute has shown that only around 40% of the low cost private rental stock is inhabited by lower income households. The rest is occupied by higher income households who are also looking for affordable rental for other reasons, for example to save for a home deposit. The loss of low cost housing has reduced the housing options available for very low, low and moderate income residents in the Operational Area. Inevitably this has changed the social make up of the community.

The provision of affordable housing in the Operational Area will support the objects and functions of the Authority by:

- Ensuring that a socially diverse residential population representative of all income groups is created and maintained in the Operational Area.
- Ensuring that people of all social and economic groups have access to a range of opportunities provided in the area.
- Providing housing choice which reflects the needs of very low, low and moderate income households.
- Promoting housing schemes and access to affordable housing to meet the needs of very low, low and moderate income households.
- Ensuring the ongoing availability of affordable housing dwellings for very low, low and moderate income households.

It is difficult to see how planning for the loss from the precinct of 700 social housing dwellings, and the proposed creation of only 700 'affordable housing' dwellings, a net gain of zero, advances the purposes of the Authority's Affordable Housing Contributions Plan.

6. Achieving tenure mix on the sites

Social mix is put forward as a solution to issues of crime, unemployment, family dysfunctionality and other ‘social ills’ that are seen to have characterized the concentration of social housing tenants (stereotypically low income, welfare-dependant, multi and complex behavioural issues) in estate-type housing. There is a continuing debate about whether this picture of social housing estates is factual on the one hand and whether simply dispersing social housing results in counter outcomes. While we are sympathetic to some of the intentions of a social mix approach, and its application in specific locations, we do not support its generic application as an appropriate or essential strategy to addressing issues of structural disadvantage in all cases. If a social mix approach is to be promoted for these sites, then there should be adequate and evidenced-based strategies for achieving it.

The draft Plan does not state how the intended mix of social, ‘affordable’ and private will be achieved across the sites. It does indicate that it is the medium rise (generally 4-7 storeys) and walk-ups (3-4 storeys) that ‘present the greatest opportunity for renewal’, and indeed, it is the detailed analysis of these dwellings and their ‘opportunity for renewal’ that forms section 03 of the draft plan.

There are 2,184 dwellings in the present high-rise apartments (8 or more residential floors) in the sites, according to the draft Plan. As the economic life of these buildings is estimated to be a further 30 years, there are no plans for renewal here. That means that the majority of the 2,800 social housing dwellings proposed under the draft Plan will be these dwellings, leaving 616 social housing dwellings to be dispersed among 4,200 private and affordable dwellings, a ratio of 1:7 across the site.

Three issues arise as a result:

- For all the talk of social mix, in effect the bulk of social housing dwellings, and so social housing tenants, will be segregated within the high rise.
- It will clearly be more desirable, from an owner/landlord/housing manager point of view to collapse the remaining 616 social housing dwellings into a handful of new high rise apartments, given that the height controls in the draft Plan allow for dwellings up to 12 storeys. On figures in the draft Plan, these 616 dwellings could all comfortably be absorbed within 3 new dwellings of 8 residential floors with the same bedroom makeup as the existing McKell apartments which have 284 dwellings.
- It would be very desirable from an owner/landlord/housing manager to build the new apartments in proximity to the existing high rises, infill on the existing high rise blocks, further segregating the social housing tenants and reducing the green and open space available to these tenants – and actually avoiding social mix.

In summary we are concerned that the boundaries of the public housing estate will be redrawn to include a much smaller area.

7. Social mix (is not tenure mix)

The population of the RWA operational area as a whole in 2006 was 22,796, and increase of 22% between 2001 and 2006, according to the Australian Bureau of Statistics. Twenty-six percent of the population in 2006 were social housing residents. That is,

whereas the 'social mix' when looked at from a dwelling point of view (i.e. tenure mix) is 44% social housing dwellings to 56% other (presumably mostly private) dwellings, the social mix when looked at from a population point of view was 22% social housing resident to 78% other resident (again, presumably mostly private renter or homeowner).

The RWA has estimated that the population increase under the draft Plan will be approximately 6,125 people. Given that the number of social housing dwellings will actually decrease, this will mean that all this population increase is likely to be higher income earners able to afford what will undoubtedly be high rents or high property purchase prices. That is, the effect in terms of a population 'social mix' will be the further marginalizing of the population of social housing tenants. The RWA figure is based on a proposed rate of increase of 1.75, whereas the City of Sydney has estimated a population increase rate of 2.02 people/unit in multi-storey dwellings. REDWatch estimates an upper population increase of 11,000 ('Draft Redfern–Waterloo Built Environment Plan Stage 2 (BEP2): overview and issues for submissions', p.6). Most of them are likely to be higher-income earners.

The social impact of such a shift in the income, and related employment, status of the population will be considerable, not only in the potential for discrimination and control of social housing tenants, generally stereotyped as beset with 'social problems', but on the commercial and community amenities that will spring up to cater to the new, richer residents. Overall affordability for social housing residents is likely to plummet.

8. Other matters in the proposed planning framework

Proposed planning controls. The built form in the consolidated Housing NSW sites will change, under the plan. The most significant change will be the loss of low-impact medium-density flats, and their likely replacement by bigger and bulkier flat-buildings. While the building of new buildings with greater bulk than existing buildings is to be expected given current government aims for densification in these suburbs, we are concerned about possible overdevelopment. The planning controls for the sites in the key matters of floor space ration and height controls are in a state of flux, with the City Council have existing and proposed new land-use and development controls (these latter currently on public exhibition) and the Authority proposing its own. Whatever the resolution, because of the complexity and potential confusion around these issues, we think it is important that all the planning controls for Redfern and Waterloo be located in one document, namely *Sydney Local Environmental Plan 2011*; therefore, any controls imposed by the Authority through the Urban Renewal SEPP should be incorporated into that LEP, rather than being included in the *State Environmental Planning Policy (Major Development) 2005* (as is floated on page 67 of the draft Plan).

Preliminary public domain strategy. The draft Plan states that one of its 'key objectives' is 'to achieve an enhanced public domain'. The draft Plan section dealing with the public domain proposes a range of measures to achieve this through the creation of new parks and open spaces, re-opening existing road closures and the creation of new through-site links and streets. While these intentions are laudable, the draft Plan does not set a standard for square meter open space/ person. It is hard to assess, therefore, what real difference the proposed measures will make to the provision of an 'enhanced public domain'.

Green Square and other inner-city developments have used open space targets of at least 10 square meters/person. We believe that the draft Plan should include a commitment to a minimum of 10 sq m/person, aligning with the Green Square precinct. We are concerned that current proposals for infill development to achieve the target number of dwellings will decrease the per capita open space in the area, and do not support such a decrease. We are also concerned that some of the proposals in the draft Plan run counter to the expressed needs of the present residents on the sites. For example, proposals for reopening some existing road closures are in direct opposition to the safety concerns of residents which led to their closure in the first place. Again, this is an area where more detailed studies prior to the release of the draft Plan could have led to more considered proposals.

Design excellence strategy. We are pleased to see the draft Plan addresses this matter. However, the matters to be taken into account as identified in the draft Plan are not comprehensive and do not in particular address the needs of social housing, and in some cases, intermediate housing tenants. For example, there is no design standard that buildings should be designed to be easily adapted to meet the changing needs of tenants. The adoption of a basic standard of ‘universal design’ that incorporates the possibility for flexibility – in line with the *Housing NSW design requirements* – would enable people less able to afford to move into alternative accommodation as their life circumstances change to remain in their accommodation and so maintain important links to community and often to essential health and other living supports.

Redfern and Waterloo in their current state are amongst the more densely developed areas in Australia. We are aware that living in density produces neighbourhood issues and disputes particular to that form of living, be it in public or private housing. Many of these issues arise from a lack of audio and visual privacy. Given that the draft Plan proposes redevelopment of the area with considerably greater density, we recommend that specific consideration be given to design and building standards that maximise residents quality of life and quiet enjoyment. These might need to be of a higher standard than that currently specified by the *Residential Flat Design Code*. For starters, we recommend the standard on acoustic amenity contained in the draft *Sydney Development Control Plan 2010* be applied.

Community facilities. The RWA and Housing NSW have commenced a review of the adequacy of community facilities in the context of the proposals in the draft Plan. Until this study is complete, we are unable to comment on this part of the draft Plan. However, we support concerns of some current residents that new facilities should not be concentrated in private developments with barriers to access by the larger community.

Social impact study. As discussed earlier, it is regrettable that a social impact study of the proposed changes to tenure and social mix, increased density, significant change in the socio-economic profile, and the increase in population has not been undertaken prior to the draft Plan. Such a study should have been undertaken to canvass a range of options before proposals on ratios of social mix and numbers of dwellings were developed.

9. The nature of private investment and private tenure under the redevelopment

We have some concerns about the potential impact on the community of the private investors in the area. Some residents have expressed concern that there will be a constant turnover of residents in the privately developed areas and that this would be disruptive to the community as a whole. The reason for this concern is that many investors and indeed home owners invest for a relatively short term seeking a capital gain that enables them to reinvest elsewhere. These concerns are supported by research for the Australian Housing and Urban Research Institute that indicates that one in four property investments are withdrawn from the rental market within 12 months (*AHURI Research and Policy Bulletin*, issue 127, May 2010). A greater number of intermediate dwellings for long term rental would alleviate this concern.

10. Consultation with social housing tenants

We understand that the process of developing the final plan for the urban renewal of the sites that are the focus of the draft Plan is as follows:

- Following the period of public comment on the draft Plan, the Sydney Metropolitan Development Authority will prepare a study under the Urban Renewal SEPP to propose the new planning controls for the precinct, taking into account the feedback on the draft Plan. It is intended that this will be exhibited for 30 days for public comment.
- This will be followed over 2011-2012 of a Housing NSW Preliminary Plan. There will be 'community engagement' in developing this.
- This will be followed by a detailed Master Plan.
- This will then be followed by a development/project application under the Urban Renewal SEPP. This development application will also be exhibited for public comment.

An important principle of Western democracy is that people are able to participate in major decisions that affect their lives. Plans to regenerate or renew social housing often mean that tenants have to move and communities will be broken up. Tenants should be able to participate in decision making around these changes. Moving from your home is a major life stress. In an ethical and compassionate society strategies need to be in place to mitigate this trauma.

The following strategies can make a difference in fostering meaningful participation and decreasing the trauma and social disruption:

- Opportunities are created for tenants to participate in the decision making, as partners, from the beginning.
- Opportunities are created for the community to come together and be informed and consulted.
- Clear timelines are provided for when tenants are likely to be affected.
- The reasons for the development are clearly explained in a way that does not denigrate either the estate or the residents.
- The reasons for the re-development should include a statement setting out all the social and economic costs and benefits.
- Clear, timely, ongoing communication tailored to all the language and cultural groups affected.
- Clear, fair and consistent policies on what people are entitled to when they move.

- Support by government (the Authority or Housing NSW) for independent, tenant advocacy, and specifically grant-funding of a tenants' advocate position (or positions) in community organizations.

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