

Submission on  
Draft Redfern-Waterloo Built Environment Plan Stage 2 (BEP2)

## Consultation Issues

*Housing NSW and the RWA will be conducting a thorough consultation process. We want public housing residents and the broader community to tell us what they think about the plan and give us their ideas for the renewal of public housing areas in Redfern and Waterloo.*

*We will give you the information you need to comment on the BEP2. We will hold large and small consultation events so you can understand what's in the plan and how it might impact on you, and then ask for your feedback on what the plan proposes. We will hold sessions in the main community languages. There will be lots of opportunities to get information and to have your say.*

*We will then assess what you told us, and incorporate, where possible, the community's comments on the plan. We will give you feedback on how the plan may have changed and if community views could not be taken into account, why not.*

[Redfern Waterloo Built Environment Plan Stage 2 \(BEP2\) Update November 2009](#)

REDWatch's focus on BEP2 has been to try to ensure that the community had the opportunity to be involved in the decisions being made about the area they live in. To this end REDWatch produced papers such as "REDWatch Discussion Paper on Public Housing Redevelopment" in August 2010 and since the BEP2 exhibition an Overview and Issues for submissions paper on BEP2 which is attached as Appendix 1.

REDWatch, along with local agencies, were consulted a number of times over how the consultations should be run. It is of concern that key aspects of our advice were not adopted in the consultation. In spite of there being an initial draft consultation framework produced no final framework was released let alone agreed with the community groups working with the target population.

You can see REDWatch's concerns from October 2010 on our website in [What Should Happen regarding Consultation on BEP2](#) and this article includes the details of what REDWatch suggested to the RWA and Housing NSW about the consultation process.

In October 2010 it looked like BEP2 would go straight to formal exhibition and one of REDWatch's main concerns was for there be to an opportunity for community input prior to formal exhibition.

REDWatch welcomes that BEP2 was placed on a non-statutory exhibition prior to formulating the final planning controls. We believe that community input into the Plan as early as possible both provides an opportunity for early feedback of community knowledge to the Authority which improves the plan and is more likely to lead to community ownership of what is finally delivered. It is also much easier for the Authority to consider changes before the document has been considered by its Minister, Cabinet and the Department of Planning.

REDWatch encourages the SMDA to follow this approach by placing material especially consultant reports, design studies and similar material into the public domain as early as possible so those with an interest in the issues / areas covered are aware of the information, can become familiar with the information and are hence best placed to provide considered comments and suggestions as early as possible in the process.

In REDWatch's view the Authority did not have to wait until the exhibition to release much of the material in the BEP2 document. The earlier release of some of this material could have made the exhibition much less over-powering as people would have only had to concentrate on the policy proposals and not at the same time the background material needed to understand and assess the proposals.

A large number of people who live in the area have extensive life experience of the community or who, from their professional and educational training, are well placed to apply their training to the issues confronting the area. By making relevant material available on a more ongoing basis the Authority stands to benefit from this knowledge early in the process rather than having to wait for the formal exhibition process.

Such a continual release of the material would also allow the Built Environment Ministerial Advisory Committee to play a role in discussions about issues which underpin policy recommendations which they currently cannot. It would also allow community centres and organisations like REDWatch to play a more useful role in encouraging community feedback rather than spending a couple of weeks trying to understand the background material and the proposed plan .

While it has been recognised that there is a role for the community to be involved in the formulation and monitoring of the research agenda for the Master Plan, there has not yet been any agreement about the role community organisations should play in ensuring a comprehensive consultation processes.

Until this happens we would expect that the consultation issue will remain contested ground between community organisations and the government authorities. These contested views can be evidenced by REDWatch's letter regarding consultation to the RWA of 15 February 2011 and the RWA reply of 25 February 2011.

REDWatch recognises the significant effort made by the RWA and HNSW to gain feedback on the proposals in the short timeframe the Government chose for the exhibition. Central to a discussion of a consultation and engagement strategy however is the extent to which people understand the questions and if they had the information to be able to reasonably respond.

REDWatch does not consider that the RWA's newsletter provided sufficient information for informed comment and the Housing NSW leaflet did little more than refer public tenants to the RWA website. As requested at the REDWatch briefing the RWA subsequently mailed a Q&A sheet with a response form to public tenants. This response was appreciated as it places some basic information into the hands of all public tenants.

The public information sessions have not involved verbal presentations which REDWatch considers is necessary for people who have literacy issues with text and plans. The information sessions instead relied on the people who attended responding to display boards and asking questions of the experts. The Housing NSW street corner meetings were at least proactively attempted to engage people who may not attend meetings but should have been supplemented with display boards in Housing NSW building foyers and community spaces, visits to community groups and use of the networks of the workers Housing NSW fund to work with their tenants.

In evaluating the BEP2 consultation REDWatch would be interesting to know what proportion of people filling out feedback forms had actually read the Draft BEP2 document that was on exhibition. It is likely that the vast number of responses were made in response to the limited scope of questions asked on the feedback form or in response to either verbal or printed summary input. REDWatch would expect that very few public housing respondents will have consulted the Draft BEP2 document on exhibition.

In its email to the RWA on consultation REDWatch used a quote from Educationalist Paulo Friere (1968) – “People need to be educated for participation, developing consciousness of their situation, to see what happened and why. You cannot just ask people what they want, people to have to learn how to ask, analyse and question. It is a dialectical process rather than information giving one”.

REDWatch is very concerned about the lack of education for participation to date. Over the last couple of years there has been pressure on agencies to avoid advocacy work on behalf of tenants. Tenant information sources like “RedWater News” have been defunded by HNSW. In the lead up to BEP2 there should have been a significant injection of resources for capacity building not a cutback.

REDWatch considers the bus trips and seminars conducted to date by HNSW as falling well short of the capacity building necessary for informed participation. This is borne out by comments made by public tenants who attended that they did not realise these sessions were about BEP2.

REDWatch would support animaters independent of government working with the public housing community to develop capacity and understanding of the changes proposed so that informed responses can be made by the community to the proposals.

REDWatch is very concerned that Government has been working on BEP2 behind closed doors for over 7 years and yet it was only being placed on community exhibition for 4 weeks. The splitting of a non-statutory and statutory exhibition does not mean that it takes less time to consult. Even if the BEP2 contained all the information required and the consultation process was flawless, this is not sufficient time for a diverse community to gain an understanding of what is proposed and to make a considered response. This is especially so as:

- English is not the primary language for many residents. There are also literacy problems so verbal information is needed not just in writing.
- There is a high level of disengagement or suspicion of Housing NSW by many public tenants
- A lot of information travels verbally around the community and this takes time
- Low levels of computer access make access to reports on the internet problematic.
- The technical nature of some of the material requires background and technical information which was not readily available
- Many community organisations meet only on a monthly basis. The short exhibition did not allow them to collectively absorb the information, discuss it and make a considered response within a single meeting. This is especially so where groups depend on its members going back to their buildings, communities or organisations to gauge people’s responses.
- A major community information source is the South Sydney Herald. Because of how the timing of the exhibition fell in relation to their publication cycle, it was unable to carry information about the

exhibition. Therefore one avenue of alerting the community to the exhibition and exploring the issues was unavailable.

Given the time constraints REDWatch is concerned that the consultation results will be skewed towards off the cuff responses based on restricted information, rather than informed responses considering a range of perspectives. We are also concerned that the responses, rather than focusing on the BEP2 proposal and the draft planning controls, may be based on issues to be considered in the Master Plan process.

The short timeframe made it almost impossible for REDWatch and other organisations the community relies upon to translate issues, to undertake the analysis necessary to understand the documents and then release the information and questions which may have led to more informed responses.

For future consultations much tension would be avoided if Government and community organisations can come to agreement before the consultation about what is necessary to adequately consult the complex Redfern and Waterloo communities.

In the interest of greater transparency and community engagement REDWatch encourages to Authority to post community submission on BEP2 on its website as was done by the RWA with the Human Services Plan. REDWatch gives permission for its submission to be posted by the RWA / SMDA without the need to de-identify REDWatch.

REDWatch also trusts that when the Authority has assessed the submissions and the supplementary reports that it will honour the 2009 undertaking that *“We will then assess what you told us, and incorporate, where possible, the community's comments on the plan. We will give you feedback on how the plan may have changed and if community views could not be taken into account, why not”*.

REDWatch believes that it is important that the community can see what issues have been raised as early as possible as this information is important for the Master Plan discussions. From the submissions supplied to REDWatch there have been a wide range of important issues raised which REDWatch would also support as needing to be assessed by Housing NSW and the Authority.

## **The BEP2 Framework**

BEP2 is predicated on the sale of public housing land to cover some of the cost of refurbishing housing stock. REDWatch strongly opposes the net reduction of government housing land. There is a long waiting list for public housing and land is a key requirement for meeting this housing demand. The SMDA as a growth centre planning body needs to also address the need for more public housing in its planning activities.

If it is decided that the BEP2 proposal is to proceed then the SMDA should concurrently look for suitable areas close to the city where the 4200 units of public housing, which could have been constructed within the Redfern and Waterloo public housing land under the new Planning Controls, could be alternatively located. We note that BEP2 commits to finding 700 of these places but the land for the balance 3500 units of much needed public housing have become collateral damage from the funding model.

The SMDA needs in its Growth Centre planning to find locations for the needed increase in public housing as well as affordable and private housing. Based on the BEP2 logic, future growth centre planning should ensure a significant proportion of public housing and affordable housing stock is provided for in all new Growth Centre developments. It should also ensure that as the opportunity arises that private housing

concentrations are broken up with the introduction of levels of affordable and public housing similar to that proposed in Redfern and Waterloo to provide “social mix”.

Social Mix is given as the main driver for BEP2. REDWatch has a number of concerns about how the BEP2 deals with social mix. In BEP2 social mix is applied only to the Redfern and Waterloo public housing estate. No recognition is made that this area is surrounded by substantial private housing. In Q&A 2 Question 13 the RWA argues that the 60% private/affordable and 40% social housing ratio will not apply to South Eveleigh in part because “the presence of adjoining private housing and park land”. Paradoxically the inclusion of surrounding private housing has not been taken into account in the 60 / 40 calculations for Redfern and Waterloo.

As Shelter NSW points out in their submission social mix is not tenure mix. In 2006 on a dwelling basis Shelter NSW argues that Redfern and Waterloo was split 44% social housing 56% other but on a population split this was 22% social and 78% other. Given the rapid growth in units in the almost 5 years since the last census, REDWatch would be very surprised if social housing units have not now dropped below the 40% target set by BEP2 and the population figure below 20%.

The “social mix” target of 40/60 and the boundaries within which it is calculated in BEP2 is asserted but not substantiated. No basis is provided for this mix or why lines should be drawn where they have been for the calculation. It seems much more evident that the 40 / 60 split is based on what government believes it can sell to private developers rather than any theoretical case for social mix or the best mix.

REDWatch rejects the social mix argument as a major driver for the changes proposed by BEP2. As we understand the research there is no established basis that moving private tenants into a public housing area will produce similar results to moving small numbers of public tenants into well-established private housing areas.

REDWatch welcomes however the move away from the 30 / 70 split used by Housing NSW in other smaller suburban re-developments. The scarcity of inner city land and the density allowable should make a 60% private (including affordable) and 40% public split still enough to attract developers.

One of the “social mix” problems with BEP2 is that it seems to assume any private housing will automatically bring a benefit to the area and to the public tenants. This may happen over time if the buyers are owner occupiers who move into the area and put down roots, but if there is concern among buyers about possible problems with their neighbours it is much more likely that the new units will be sold to investors who put the units onto the rental market with the probable result that private occupants on short leases will turn over more quickly than public housing tenants.

A more stable community may well result if the increased population was a mix of public and affordable housing rather than private but as this would require greater Government expenditure to subsidise the affordable housing it is unlikely.

BEP2 needs to look at ways that unintended outcomes like this can be avoided. This might include avoiding developers that produce exclusive rental accommodation for the first few years of a development or looking at private unit management being handled through a community housing provider such as the operator Housing NSW had a recent seminar.

REDWatch continues to argue that the Government needs to urgently address issues with human service delivery to public housing tenants. It is of major concern that this element is missing from BEP2. As public

housing concentrates tenants with higher and higher needs in its properties there has not been a commensurate increase in the delivery of human services to its tenants. This is needed to ensure tenants own sometimes multiple needs are appropriately met. It is also needed for those who live around them to ensure that their neighbour's sometimes problematic behaviour does not impact on them and their community.

These human service issues have to be addressed if there is to be a minimisation of the impact of high needs problem behaviour. Increasing the density and introducing private tenants into closer proximity to public housing makes it even more important that the management of human service deficiencies be addressed as early as possible.

REDWatch would like to see a Social Impact Study undertaken as part of the Master Plan. Such a study should look at both soft and hard data and seek to assess what the likely impact of the proposed development on the existing community is likely to be. It should also assess the impact of the current level of service delivery and the likely requirement for increased and improved service delivery.

REDWatch is very concerned about the lack of demographic analysis in BEP2. This is particularly concerning given that almost 5 years has elapsed since the last census which is used exclusively as the basis for the scant demographic analysis. If the population increases 22% between the 2006 and 2011 census as it did between 2001 and 2006 then the area profile now will likely be very different from that portrayed in BEP2.

As around 40% of the areas units and 20% of the area's population are public tenants, HNSW must have the information to provide its current tenant profile and make its own demographic trends based on its current allocations policies and its waiting list.

As HNSW tenants are a discrete population largely unaffected by the broader private housing trends any demographic projections would need to be a composite of HNSW expected trends and the market trends evident within the area. On the private side occupancy from the new developments in Waterloo and Green Square probably provide a good indication of the market and likely occupancy.

REDWatch recalls the proposals to close Redfern and Erskineville Public schools in the late 1990s. The proposed closures were based on the enrolments at the time. No one bothered to look at the trends and notice that there was a substantial wave of children about to hit the schools. Within a few years the Education Department offices which occupied vacant classrooms at Erskineville PS had to be removed to accommodate increased enrolments and Darlington PS was at capacity.

REDWatch urged the RWA, prior to the sale of the Redfern School site, to make an assessment of the likely schooling needs in Redfern and Waterloo based on the population increases proposed by the RWA. The response at the time from the RWA was that if the population increase resulted in the need for a school in 20 years then the Government would have to buy some land to build one at that time. REDWatch considered this answer totally unsatisfactory then and believes the question again needs to be asked before more Government land is alienated.

The SMDA needs to undertake a robust demographic study for the area prior to allowing the selling off of any more government land. It needs to do this so that the increased population for the community being planned for the entire area in 10 and 20 years' time will have the appropriate community facilities. As well a school it may also need to plan for aged care facilities and other age specific facilities such as parks, playground and pre-schools.

REDWatch understands that the Authority had not done the level of planning necessary to be able to provide a firm population increase figure in BEP2. The estimate finally included in the RWA's Q&As should have been provided in the BEP2. The SMDA and HNSW need to develop a realistic estimate for the future population of the redevelopment and the surrounding area. This is needed for open space and community facility planning.

HNSW and the SMDA need to calculate expected housing stock mix and estimated population for the different tenure types. REDWatch suspects that the population estimate in the BEP2 Q&A's is on the low side. We would expect for example that affordable housing occupancy would be higher than current public housing occupancy on which the Q&As are based. We note Council's use of the 2006 census figure of 2.02 people per unit in a multi-storey building compared to the RWA's use of 1.75 based on other council data.

REDWatch is unable to obtain the data to test the RWA Q&A figures but we note that If there has been any increase in the number of people living in each unit since 2006 or if there is any increase in built density allowed by the time the units are built, or if the size mix varies from that used in the Q&A's then the population figure are likely to be greater than those provided in the Q&A's.

We urge the Authority to refine its modelling for population figures and release revised estimates with its demographic projections as soon as possible so they can be used in discussions about open space and community facilities.

REDWatch welcomes the undertaking in the RWA's Q&A2 Q11 that clarifies the intention of BEP2 that the ***"Draft BEP 2 aims to create a genuinely mixed community where private, social and affordable housing residents can live in different forms of housing throughout all neighbourhoods. It is anticipated that retained buildings will be used for all forms of housing. Social housing will be provided in a mix of retained and new buildings, and some high-rise towers will be utilised for private and affordable housing. This will be determined during the detailed Master Planning process"***.

REDWatch also notes the commitment to the refurbishment of the buildings to be retained in Q12 of Q&A2. On this answer we note that by the end of the proposed time frame the high-rise be close to their expected replacement date. If some of the high-rise upgrades are left until the 25<sup>th</sup> year the best use of funding may not be made. REDWatch thinks that the upgrade of the existing high-rises should be done towards the front end of the project not spaced evenly throughout it.

One of REDWatch's initial concerns about BEP2 was that without sufficient government funds the existing low-rise area could be redeveloped for private and affordable housing while public tenants remained in the existing un-renovated high-rise with only around 600 new public housing units being created. Only if over the next 20 years Governments commit the ongoing level of funds necessary to top up the short fall in funds from developers to deliver the project in its entirety, would our concern be totally addressed.

BEP2 states that: "The renewal of the social housing sites and realisation of BEP2 objectives will require funding from both the private and government sector and is subject to government decisions about funding for renewal." So while the BEP2 Q&As provide a statement of intent the funding has not yet been committed by Government let alone delivered.

Given the budgetary pressures and the 25-30 year timeframe for the project REDWatch believes that the community will need to be vigilant to ensure that Government does end up committing the funds needed to deliver the comprehensive package outlined.

The nature of a Public Private Partnership itself introduces financial pressure on government which also needs to be monitored. For example Housing NSW may want a salt and pepper mix of public, private and affordable housing on the same block of land or even in the same building, but this will be difficult for developers to sell to private investors or home owners. For the developers and Treasury the best returns will be achieved by leaving public tenants in the high-rise and in the infill housing around them with private developments separated from public housing. To do otherwise is likely to increase the Government's costs creating a financial disincentive for Treasury to deliver a truly mixed redevelopment.

To try to ensure that funding from Government needed to deliver the BEP2 project as outlined, REDWatch recommends it would be prudent for the Planning Controls to include a staging requirement that links the redevelopment of the walk up area to the renovation of the retained high-rise. Without such a linkage it is possible that private developers will be allowed to redevelop the low-rise which has no cost to Government, while at the same time dragging its feet on the renovation of the high rise due to "budgetary pressures".

## **The Draft Controls**

### **a) BEP2 – The Planning Framework**

It appears to REDWatch that there are two basic questions that need to be addressed in forming a response to the proposed BEP2 Planning Framework. Does the framework respond to the local context where the controls are proposed and does the framework adequately capture BEP2's stated intent so that the intent will be delivered?

REDWatch does not have the technical ability to be able to gauge if the proposed controls can deliver the increased density as well as the amenity promised in BEP2. The lack of an undertaking regarding open space per person or the provision for it independently on any block, cause us to be concerned about the deliverability of the amenity.

REDWatch notes that the City of Sydney did propose increased density for the Housing NSW sites in their draft LEP but that these increases were not sufficient for government and hence government removed planning control for the consolidated housing sites from the Council. While BEP2 provided a comparison with the Council's Urban Design Study it did not initially disclose that BEP2 was seeking an increase of 15.7 hectares of floor space which equated to a 35% increase in density over the Council's proposed controls. REDWatch's calculations based on BEP2 Appendix A are attached as Appendix 2 to this submission.

REDWatch is aware that the land owner, Housing NSW, was pushing for an even higher density than that currently proposed in BEP2. This indicates that the usual risk for the densities to be further increased during the course of the development process also exists for this project; as such an increase is in both the interest of HNSW as the land owner as well as by the private developers.

REDWatch is concerned that the density proposed have been driven primarily by the Government's decision to redevelop the site under a Public Private Partnership and that the densities proposed are those that are necessary to achieve a commercially viable outcome rather than densities that respond sympathetically to the surrounding community.

Given direct Government financial interest in this development REDWatch is of the view that there needs to be careful scrutiny of the controls to ensure they are appropriate for the area and will deliver the open space and amenity required for the significant increase in population.



REDWatch awaits the City of Sydney submission on the BEP2 which will hopefully provide an alternative assessment of the appropriateness of the density increase proposed.

The second broad area of concern to REDWatch is that the final controls adequately capture the spirit and intent of BEP2. The controls will become part of the planning law around the development, and as such they will be the framework for the development, not the BEP2 with its idealistic artist impressions and stated intentions. So for an example the FSR, height and land use controls give the parameters for the built environment; these do not tell us who will live there. Hence these alone make it possible to redevelop the walk-ups and build the infill but say nothing about the high-rise renovations or how “social mix” might be applied across the entire site.

While we appreciate that these areas will be taken up in the Master Plan, REDWatch is of the view that it is prudent that the controls should also make some provisions to include the BEP2 intent to help preserve it against the inevitable pressures that may come from either Housing NSW, Treasury and the private developer partner to modify the project.

## **b) Land Use Controls**

REDWatch notes the proposed controls provide for increased Mixed Use Zones over those proposed by the City of Sydney. This aspect of the controls does not seem to add up and REDWatch fears that the new commercial land use zonings may lead to erosion of the residential floor space.

Using the 85sq.m/housing unit guide for units provided by the RWA, BEP2 only makes provision for around 9,775sq.m of commercial space, some of which will presumably be spread through the residential areas as “Neighbourhood Shops”. REDWatch’s analysis of BEP2 using a 85sq.m/unit gauge is attached as Appendix 3.

REDWatch is also concerned that the proposed Mixed Use Zones are not limited to frontages onto Cope, Elizabeth and McEnvoy Streets where it is argued that there is existing commercial development. It also allows for Commercial space fronting onto Walker, Cooper and John Streets which are proposed as residential streets. Given the provision in the Residential Zoning for neighbourhood shops we question the extension of the Mixed Use Zoning onto these residential streets.

BEP2 notes that “many buildings in McEvoy and Cope Street near the adjoining the precinct are aging and ripe for redevelopment” (p 56). More work should be done to explore the future makeup of this area before proposing to expand this Mixed Use Zone in case residential development predominates in the redevelopment.

There is no indication in BEP2 of how the proposed new zones may impact on existing business zones in Redfern & Waterloo which are already under pressure in part due to the low usage of these precincts.

REDWatch supports the proposal for the introduction of community orientated commercial activities and social infrastructure and services. We would like to see that expanded to include trades and employment training.

Special consideration should also be given to ensuring suitable locations are available for tradespeople and other service industries required in the area as many of the trade premises have been driven out of the area by rising land values and the lack of suitable sites. Such local blue colour services are important employment and training avenues for many who have not performed well academically at school.

Of major concern to REDWatch is that there is no provision for any Recreation Zones in Redfern Waterloo; only at South Eveleigh. REDWatch produced a flyer on Open Space which sets out some of our concerns and this is attached as Appendix 4. We have more to say about this later in this submission. In terms of the land use controls REDWatch believes that key areas of open space should be protected by land use zoning and not left to the outcome of trade-off between height and FSR.

### **c) Floors Space Controls**

As noted in the introduction to the Planning Controls, REDWatch is unable to assess the appropriateness of the density proposed. The conflicts of interest inherent in the Government settling densities, which will attract developers to redevelop Housing NSW land to deliver new and renovated public housing cost effectively to Government, calls for close scrutiny.

Currently Open Space needs to come from the trade-off between height and FSR and REDWatch is of the view that key open space areas should be provided for by a reduction in FSR rather than an increase in height.

REDWatch has used the RWA's 85 sq.m/unit figure to do an analysis of the 60.4 hectares of floor space allowed by the proposed FSRs across the entire site and to show how this is distributed across each block. The figures show a capacity for 7108 units of this size across BEP2 Redfern and Waterloo HNSW sites. These figures can be found in Appendix 3. While REDWatch has broadly substantiated the capacity of the density proposed to yield the number of units proposed by BEP2 we cannot assess the ability of the controls to deliver the required amenity.

One area of concern is that BEP2 did not provide information on the actual floor space of existing buildings. This is important information for assessing the potential allowed in the controls for infill housing. The figures on current built FSR indicate that the high-rise currently averages below 85sq.m/unit and hence the potential for infill is greater than the 85sq.m average indicates. This indicates that Housing NSW properties are likely to average under the 85sq.m/unit which will allow for private units to be over this average figure which may also indicate a higher population than indicated by the RWA.

REDWatch is concerned that the BEP2 Newsletter and other material did not provide information about the proposed infill buildings. We were unable to get clarification from the RWA regarding the infill figures which were only included in BEP2 Appendix A. As this is a key element of the proposal this should have been broadly disclosed as this impacts directly upon existing open space around the high-rises.

If all the high-rises are retained then there will be a need for around 620 units averaging 85sq.m of "infill" housing to be built on the high-rise blocks to meet the BEP2 housing unit targets.

BEP2 proposes floor space of between 2.5 and 3 times the land area for all the sites except Purcell which is proposed to be set at twice land area. BEP2 proposes 15.7 hectares more floor space than proposed by the City of Sydney, an increase of 35% and increases the floor space ratio from an average of 2.03:1 for the City of Sydney Draft Controls to an average of 2.75:1 for the BEP2 draft controls.

REDWatch is surprised that the proposed controls, both for densities and heights, are greater along Elizabeth Street than between Walker and Morehead Streets. In planning terms we support the principle of height being maximised on the ridge not in the trough. Under the existing controls there is a greater likelihood of overshadowing of Redfern Park and Oval in the morning and properties in Morehead and Walker Streets being flanked to the east and the west by much taller buildings.

BEP2 proposes that “where appropriate” the floor area for “local retail, community orientated commercial activities, and social infrastructure/services” be excluded from the floor space for a particular block. This means that the floor space for such activities may be in addition to floor space available on a site. The RWA has clarified that its intention is that “only community uses and social enterprises are intended to be excluded from the FSR controls”. This needs to be reworded in the proposed controls to avoid any ambiguity that would expand commercial floor space.

It also needs to be made clear the quantum of such floor space that might be added into the overall floor space proposed as this may add to the overall density on a block. It may make sense, for example, for such bonus floor space to be applied in proximity to open space. This could lead to pushing up density significantly over the built area as the bonus area and open space are added to the block.

REDWatch notes that all the existing high rise towers can fit within the floor space proposed with some floor space available to build new infill units on the open space next to them. REDWatch welcomes the controls accommodating the density of current built form as this means that there need be no loss of public housing stock when these buildings are redeveloped to fit within the envelope proposed by the controls.

#### **d) Height Controls**

REDWatch is concerned at the use of predominant heights in the Draft BEP2 controls. While we appreciate that the RWA newsletter explained that the 8 storeys shown on the height map could be up to 12 storeys we spoke to a number of people who had not understood this from the RWA newsletter.

It was also not possible to make a direct comparison between heights in BEP2 and council proposed plans because BEP2 uses “Predominant Heights” while, in line with Department of Planning requirements, City of Sydney Council uses “Maximum Heights”. If you compared the Council’s proposed heights with BEP2 heights in many cases the Council heights are taller to allow for height variability even though the BEP2 density is greater. REDWatch was concerned that as this was the only map used in the RWA Newsletter and that it may have provided a misleading impression of what was proposed if the reader did not also read the qualifications on a different page of the newsletter.

REDWatch is strongly of the view that the final controls should be shown as maximum heights in line with the standard instrument provisions that the Department of Planning has introduced for councils. The colour schemes should also follow the standard template. To do this the draft controls may require some further work in the Master Plan on open space and community facilities so that appropriate maximum height controls can be developed.

In line with our comments on density we are concerned that taller height zoning is proposed for Elizabeth Street rather than height being given on the ridge line.

REDWatch is also concerned that the lack of separate provision for open space and a suitable adjustment to FSR will result in higher buildings than would be achieved if provision had been made for open space at the outset.

REDWatch welcomes the ability of the controls to accommodate the FSR for the existing high-rise within the height controls proposed by BEP2.

## **e) Urban Design Guiding Principles**

REDWatch welcomes the BEP2 proposal to include Urban Design Guiding Principles within the Planning Controls. Similar principles were not included in the BEP1 Planning Controls. Floor space, land use and height define only what is built; some of the Design Principles proposed in BEP2 deal with who will live in the area – such as the 40% social 60% private housing mix and even the sustainability of the community.

REDWatch encourages the Authority to give particular thought to what needs to be in the Design Principles within the Development Controls to ensure that the spirit and detail of the BEP2 proposals flow through into the completed project. This is particularly so to ensure this part of the controls cover the BEP2 Vision, the community, the public domain and open space, extra land use provisions, urban street patterns, built form, design, environment and heritage areas as mentioned in pages 66-67 of the Draft BEP2. For example how can the Urban Design Guiding Principles ensure the Controls actually “create a sustainable community represented by a mix of social affordable and private housing”?

One area REDWatch would like to see included in the Urban Design Guiding Principles is the linking of the ability to redevelop the walk-up sites to the refurbishment of the high-rises. Staging requirements are often included in Concept Plan approvals to ensure that the mix of development proposed is actually delivered. REDWatch is of the view that, given the undertakings to refurbish the existing high-rises is central to BEP2 but not governed by the Controls, it would be prudent for the Urban Design Guiding Principles to cover the intent to refurbish by linking redevelopment of the walk-ups in line the refurbishment.

While REDWatch would prefer to have significant new open space areas preserved in the Land Use Controls as public recreation, the Urban Design Guiding Principles should also set a target of the open space per person to be provided across the development. REDWatch is of the view that there should be a target of at least 10sq.m/person.

REDWatch would also like to see more work done on done in the environmental sustainable aspect of this project. The redevelopment of such a large site lends itself to this development being a part of the Council’s Green Transformer approach through the inclusion of trigeneration. As energy costs increase they will disproportionately impact on poorer people and this redevelopment provides the opportunity to not only address the issue by locally generated power, heating and cooling for the new development but also opens the possibility of providing these utilities to the renovated high rise from the trigeneration sites. These options need to be explored as they stand to help to keep costs down for those that can least afford them.

## **f) Design Excellence Strategy**

We note that the Design Excellence provisions developed in BEP1 will be applied to BEP2 and will be included in the Planning Controls. BEP2 suggests many of the matters raised should also be considered in the Master Plan.

There are some design aspects which REDWatch believes are critical for new public housing which are not included. At a minimum all buildings should be designed so that they can be easily adapted to meet the changing needs of their tenants.

REDWatch is of the view that the controls should require universal design standards for all public housing so that they include the flexibility required for tenants from the outset. Tenants should not need to be relocated or wait for building alterations should their mobility or other housing needs change. We

understand that there have been studies that indicate that initial universal design is more cost effective than having to alter buildings after construction.

REDWatch is also concerned that Design Excellence seems only to relate to the built form presentation, such as the expensive blue tiles on feature walls in the recent Morehead Street development rather than health and liveability. In this development, which trumpeted natural ventilation as part of its green star design rating no fly screens were installed even though the units are situated in an area prone to mosquitoes in part because of the high water table nearby.

Thought needs to be given to what Design Excellence means in public housing and how this can be incorporated into the Controls. For example the build quality for public housing should be such that it allows for easy maintenance and its design and build quality is such that long term maintenance costs are minimised. For example services should be designed to be upgraded and not buried within the building as is the case in many modern buildings.

Shelter in their submission argue that there is a need for a higher standard than is currently specified by the *Residential Flat Design Code* and that on acoustic amenity the Standard contained in the draft *Sydney Development Control Plan 2010* should be applied. REDWatch supports a high level of acoustic amenity, especially given the sometime problematic behaviour of neighbours be they public or private. Noise and odours from adjoining units is a common complaint that needs to be addressed.

## The Issues needing further Work

There are three issues - the public domain, community facilities and transport and movement that are covered in the Planning Framework that indicate more work will be undertaken. BEP2 makes some indications of what is proposed in these areas but fails to mention other areas that should be locked into the Planning Framework and not left only for the Master Plan.

### a) **Open Space and The Preliminary Public Domain Strategy**

BEP2 states "The delivery of an enhanced public domain is a key outcome of the social housing renewal which the draft BEP2 seeks to facilitate" and yet there is no commitment in BEP2 to any target for open space to ensure adequate open space is provided for the higher density population.

Depending on how you define the area, Redfern Waterloo has open space between 5.9 and 6.9sq.m/person compared to the City of Sydney Council area average of 11.8sq.m/person. Historically 2.83 hectares/ 1,000 people (28.3sq.m/person) was in the Environmental Planning and Assessment (EPA) Act, but over time this has been removed. We understand Green Square and other inner city developments set a target of 10sq.m/person.

While BEP2 talks about new parks and upgrading existing parks it also proposes decreasing some existing open space at Waterloo Green with infill housing around the high-rises.

The redevelopment must deliver at least 10sq.m open space/person. While Redfern Park and Waterloo Park may be close it is imperative that this development increase open space to cater for the increase in population. Any decrease in the per capita local open space of the Redfern and Waterloo area should be resisted strongly.

More details on Open Space issues and BEP2 can be found in REDWatch BEP2 Issues : Open Space - PDF Leaflet in Appendix 4. REDWatch has encouraged residents to cover the need for a per capita open space target in the Controls and for public parks to be protected by Land Use Zoning.

The public domain strategy section of BEP2 also deals with the removal of street closures. This proposal has concerned many at Poet's Corner who were involved in the campaign for closures. Included in the proposed street closure removals is Kettle Street which was wrongly depicted as remaining a street closure with public open space in a sketch in the RWA's BEP2 newsletter. This section of BEP2 also deals with laneway upgrades and through site links. Before such closures are removed it will be important for the Authority and Council to understand the reasons for the closures in the first place and to explore what mitigation measures can be introduced to address these issues should the closure be removed.

### **b) Preliminary Transport and Movement Strategy (p86)**

REDWatch is concerned that only one page in BEP2 refers to the Parsons Brinckerhoff Transport and Traffic Study. This study investigated the likely traffic generated by the proposed planning framework and concluded that "the proposed planning framework would result in only a modest impact on the traffic performance on the surrounding road network".

While traffic studies tend to look at performance of the road network, residents look at what the changes mean for them, their streets and their parking. The traffic study is silent for example on the likely impact that the redevelopment will have on public tenants and the new private residents' inability to access on street parking permits or the likely parking controls that will be necessary to manage the likely increase in on street parking when onsite parking is restricted.

Traffic issues proved a major concern in BEP1. When council undertook its own traffic study in Darlington many of the RWA North Eveleigh recommendations were not accepted by Council. It would hence be useful if the Authority could work with Council on the Transport, Movement and Parking Strategy.

BEP2 proposes using a 60% non-car travel mode share target for travel to and from the BEP2 area. The study seems focused on travel to and from the city or via Redfern Station. Public local transport options, especially east west transport links, are noticeably missing. How people get to hospitals, shopping centres, regional open space and sports grounds for kids sport are totally missing. The Village to Village bus which has continual funding uncertainty gets acknowledged with a graphic on page 23 of BEP2 but its important service is not mentioned at all in the Transport Strategy. To remove the need for cars the linkages people need for their day to day activities have to be provided.

BEP2 also proposes "promoting reduced car parking rates, generally in accordance with the controls outlined in the City of Sydney's draft LEP 2010". It also proposes that public tenants should have an entitlement of only 60% of private tenants based on public tenant car usage. The applicability of the lower rate for public tenants needs to be tested by Housing NSW's own figures. It is also crucial that there be allowance made for visitor and carer parking which is needed by many public tenants.

REDWatch argued in relation to parking at the Fraser CUB site development for a separation of parking entitlement from the strata title. This allowed for parking to be handled by a separate body which can allocate parking as it is needed rather than at time of strata sale. This approach also allows for parking areas to be constructed in such a way that they can be wired and managed for electric cars or used for other purposes as car usage changes over time. It also allows for care share spaces to be adjusted in line with usage.

REDWatch encourages the Authority and Housing NSW to explore this model of managing parking. We also encourage the Authority to study car use in the area and to develop transport strategies that will allow people to live within the area without a car. This is likely to involve improved east west linkages and local area transport options. These are also essential for the large number of people who do not have independent transport and make up a significant portion of the public housing population.

While the BEP2 parking study found spare parking capacity REDWatch is aware of complaints being made in Waterloo about commuter parking creating problems for local residents. Such problems are likely to worsen with increased density and as people in new developments lose any right to qualify for on street parking permits and visitor and carer parking are squeezed.

This area needs a lot more work if the problems being experienced in Alexandria as a result of the ATP Channel 7 development are not to be repeated in this redevelopment.

### **c) Community Facilities**

REDWatch welcomes a detailed review of the provision and adequacy of community facilities in and within the vicinity of the Redfern Waterloo Operational Area. There is already a demonstrated need for buildings for existing human service providers let alone the space for new services to meet the requirements of the enlarged community such as child care, schools and other community facilities.

It is important for community facilities needs to be identified so that provision can be made for these in the Building Controls rather than being left as bonus floor space for “community uses and social enterprises”. It is important to ensure that this provision does not allow bonus floor space for pools and gyms within private developments exclusively for private tenants.

The Authority and Housing NSW need to explore how facilities like swimming pools and gyms can be open to the entire community rather than located in private developments. This will require probably some form of levy from both Housing NSW and the private developments into a common fund with an external operator. If the aim of BEP2 is to promote greater social mix then there have to be places for interaction. The development has to lead to ‘bumping areas’ and resist the tendency for gated private developments with their own pools, gyms and other services separated from the rest of the community.

It is hoped by many that miss the hydrotherapy pool that was lost to the community with the sale of Rachel Foster Hospital, that one of the pools created might include this facility for the aged and others needing such a pool.

In exploring community facilities there needs to be recognition that public and private tenants may have different requirements. One public tenant commented at the REDWatch stall in Redfern Park that they did not want expensive corner shops on every block they wanted easy access to a cheap supermarket and affordable goods and services. They were concerned that many of the services they had were likely to be replaced by more expensive options chasing the private tenants.

One of the major community facilities is usable open space including safe play grounds for children of various ages.

## What is missing from BEP2

### a) Developer Contributions

BEP2 makes no proposals for the application of a Developer Contributions Plan as part of the financing of the redevelopment of the public housing estates in Redfern and Waterloo.

The entire redevelopment is constructed around private development providing significant funding for new Housing NSW stock, renovation of the existing high-rises as well as the provision of Affordable Housing in exchange for government land and favourable Development Controls. There is however no indication of project costs and how the various components will be funded.

Will for example the Government do a deal with one developer for the entire project or will the sites be developed site by site with different developers. While the latter is likely to lead to greater diversity of built form there is no proposed mechanism for the way the developer is expected to contribute to the social housing renewal and renovation.

It seems to us that Developer contributions should be part of the mix of mechanisms for developers to contribute towards community infrastructure, yet BEP2 is completely silent on how the project is to be funded on either the government or developer side.

In the interests of transparency REDWatch would like Housing NSW and the Authority to put up an indicative budget of what the redevelopment is expected to cost and where the funds for the development are likely to come from. We appreciate that the final figures will depend on developer interest and the deal that Housing NSW can strike for the development.

How the 700 new public housing units to be removed from Redfern and Waterloo will be funded and where they will be located should also be made clear.

It should also be disclosed if and how other Housing NSW properties in Redfern and Waterloo, especially in the high maintenance heritage area, will be renovated or renewed and if this is to be funded by the BEP2 development.

### b) How will Affordable Housing be funded and operate

BEP2 aims to deliver 700 affordable homes but the RWA has still not delivered an Affordable Housing Plan (expected December 2010) or explained how the Affordable Housing is to be paid for or how it will operate.

Much has been said about Affordable Housing for Key Workers. Will BEP2 affordable housing also make provision for public tenants who may gain employment and as a result no longer qualify for public housing but not earn enough to rent privately in the area?

Will there be a mechanism for any public tenants or affordable housing tenants to move to home ownership or is this project only considering affordable rental housing. Will the affordable housing be long term stock or is the Authority and Housing NSW considering a limited 10 year affordable housing option before sale at market rates?

REDWatch notes current RWA Affordable Housing Contributions Plan only applies to the BEP1 area and is calculated at the cost of 1.25% of the Gross Floor Area. In BEP2 the 700 affordable housing units represent 10% of the total stock. Given the need for affordable housing will the SMDA look to alter the Affordable



Housing Contributions Plan to a more realistic requirement and will it look at making affordable housing and public housing delivery a part of its Growth Centre planning for private developments?

REDWatch is of the view that the Affordable Housing under BEP2 must be in addition to the Affordable Housing already announced for North Eveleigh where “between 12% and 16% of residential dwellings on the site [will] be affordable housing – which breaks down to between 150 and 200 dwellings, depending on size,” (Minister Sartor release 26 April 2008). The Affordable Housing at North Eveleigh is to be primarily funded by the Affordable Housing Levy paid by Fraser’s from the former Carlton United Brewery site as required by the RWA Act rather than by the 1.25% levy.

## **The Master Plan & Development Controls Interaction**

REDWatch notes that Housing NSW Master Plan will provide the finer level detail for the proposed redevelopment of the Redfern and Waterloo public housing estates. As indicated BEP2 defers some important issues to this study and REDWatch is of the view that the Authority should delay introducing controls until some of the important issues deferred to the Master Plan are resolved.

REDWatch has had mixed signals from the RWA about what of the deferred projects may be finalised by the time the SMDA put forward Controls for formal exhibition. The time line in Q&A1 and the BEP2 text indicate that the controls will go forward well before the Master Plan is finalised.

If the Authority cannot defer the Controls until the Master Plan studies are finalised then we are of the view that the Authority should propose only interim controls that are reviewed when the information from the Master Plan is available.

REDWatch contends that it is only after more detailed work on the Master Plan that issues such as the impact of the provision of adequate open space and community facilities can be reflected back into land use controls and realistic floor space and maximum height controls.

To the extent that REDWatch is able, as a totally voluntary community organisation REDWatch is happy to continue the dialogue with the Authority and Housing NSW to ensure the best possible outcome is achieved for public tenants and the broader community.

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This Submission is a public document. It has been produced by REDWatch and submitted on 28 February 2011 to the Redfern Waterloo Authority, the Sydney Metropolitan Development Authority and Housing NSW.

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*REDWatch is a residents and friends group covering Redfern Eveleigh Darlington and Waterloo (the same area covered by the Redfern Waterloo Authority). REDWatch monitors government activities such as the RWA, SMDA and Housing NSW and seeks to ensure community involvement in all decisions made about the area. More details can be found at [www.redwatch.org.au](http://www.redwatch.org.au).*



## Draft Redfern-Waterloo Built Environment Plan Stage 2 (BEP2) Overview and Issues for Submissions

**The Draft Redfern-Waterloo Built Environment Plan Stage 2 is on exhibition until 28 February 2011**

### **Consultation Problems because of Short Exhibition Period**

REDWatch's initial focus is to try to ensure that the community has the opportunity to be involved in the decisions being made about the area they live in.

REDWatch welcomes the RWA placing BEP2 on exhibition prior to formulating the final planning controls. This provides for community input into the Plan prior to it being finalised and placed on formal exhibition by the Department of Planning.

REDWatch is very concerned that Government has been working on BEP2 behind closed doors for over 7 years and yet it is only being placed on exhibition for 4 weeks. Even if the Plan contained all the information required and the consultation process was flawless, this is not sufficient time for a diverse community to gain an understanding of what is proposed and to make a considered response.

The consultation has been far from flawless. The process chosen is highly dependent on internet access which is not available in most public housing households. REDWatch does not consider that the RWA's newsletter provided sufficient information for informed comment and the Housing NSW leaflet did little more than refer public tenants to the RWA website. Public information sessions have not involved a verbal presentation and have relied on people responding to display boards and asking questions of the experts. This is a long way from best consultation practice especially when dealing with a diverse public housing community. REDWatch has written to the RWA raising more detailed concerns about the consultation - [REDWatch Concerns Regarding BEP2 Consultation](http://www.redwatch.org.au/RWA/bep2/110215redw) (www.redwatch.org.au/RWA/bep2/110215redw).

REDWatch is very aware that in the short time available we have not been able to get all the clarifications and information required to produce these initial comments for community discussion to the standard we would like. This may lead to some errors and misunderstanding of some of the very complex details in the report. Given the short period for exhibition we have no other alternative than to "run with what we have got" and hope it encourages discussion and comments to the RWA.

### **The Government's Plan – The Big Picture**

While the exhibition is primarily about the planning controls that stem from its BEP2 it is also very important to provide feedback on the underlying plan. To do this we need first to try to explore the government thinking behind this plan.

Housing NSW needs to renew some of its housing stock; HNSW also needs to better match housing stock size with the size of units needed by its tenants. The NSW Government is looking for places where there is existing infrastructure to put increased housing density. Government also needs affordable housing so Key

## Appendix 1

Workers can afford to live in the inner city. The state and federal governments would like to end concentrations of public housing to get a “better” mix.

BEP2 aims to bring these together in a bundle the Government hopes will attract private developers to come on board to cover the bulk of the cost of achieving the Government’s goals. In other much smaller suburban public housing redevelopments the mix required to secure developer involvement has been 70% private to 30% public. In Redfern and Waterloo the RWA believe that the scarcity of inner city land can make a 60% private (including affordable) and 40% public split enough to attract developers. About 2184 high-rise units will be refurbished and new stock built to provide the 2800 public housing units to be retained in the area.

To fund this renovation and renewal Housing NSW will sell off public housing land to make way for 4,200 private and affordable units while 50,000 people sit on the public housing waiting list. They will also purchase or build 700 public housing units elsewhere in the City of Sydney so there is no loss of public housing units in the Sydney Local Government Area to replace units moved out of Redfern and Waterloo. To have substance Housing NSW need to ensure that there is no loss of public housing stock elsewhere in the Sydney LGA in the meantime.

Promoting “social mix” is given as one of the drivers of the redevelopment. In fact overall Redfern and Waterloo are very mixed. It is only the area of social housing that the RWA has drawn a line around that is not mixed. Worryingly there is the possibility, depending on how the redevelopment proceeds, that after the redevelopment it might be still possible to put a line around public housing and argue that it is still not mixed!

Housing Mix would require Housing NSW to renovate the retained high-rise to a standard suitable for private units and to ensure service delivery to its public tenants for a workable salt and pepper mix of public and private tenants. But with a mix in the same building or even the same block it will be difficult for developers to sell to private investors or home owners. For the developers and Treasury the best returns will be achieved by leaving public tenants in the high-rise and in the infill housing around them with private developments separated from public housing. To do otherwise is likely to increase the Governments costs.

One of the problems with BEP2 is that it seems to assume any private housing will bring a benefit to the area and to the public tenants. This may happen over time if the buyers are owner occupiers who move into the area and put down roots, but if there is concern among buyers about possible problems with their neighbours it is much more likely that the new units will be sold to investors who put the units onto the rental market with the probable result that private occupants on short leases turn over more quickly than public housing tenants. A more stable community may well result if the increased population was affordable housing rather than private but as this would require greater government expenditure to subsidise the affordable housing it is unlikely.

REDWatch has argued that the Government needs to urgently address issues with human service delivery to public housing tenants. As public housing concentrates tenants with higher and higher needs in its properties there has not been a commensurate increase in the delivery of human services to its tenants. This is needed to ensure tenants own sometimes multiple needs are appropriately met and also by those who live around them to ensure that their neighbour’s sometimes problematic behaviour does not impact on them and their community. These human service issues should be addressed now. Increasing the density and introducing private tenants into closer proximity to public housing makes it even more important that the management of human service deficiencies be addressed as early as possible.

## Appendix 1

REDWatch is concerned that BEP2 provides no detail about the Government's commitment to renovate retained buildings or to ensure that the redevelopment meets any targets for the renewal of public housing stock. The final outcome will be very much dependant on the level of funding committed by governments over the life of the plan.

BEP2 states that: "The renewal of the social housing sites and realisation of BEP2 objectives will require funding from both the private and government sector and is subject to government decisions about funding for renewal."

REDWatch is very concerned that in the absence of firm commitments of government funding to refurbish and renew public housing stock that the BEP2 Development Controls could result in the existing low-rise area being redeveloped for private and affordable housing while public tenants remaining in the existing un-renovated high-rise with only around 600 public housing units being created. Under the Controls this could happen as infill around the high-rise buildings.

REDWatch is also concerned that any renovation addresses the liveability of the high-rise and the needs of the tenants that live there. There is concern that renovation could primarily improve the external appearance of the high-rise thus making them more visually pleasing for their new private neighbours rather than addressing the issues of those that live within the buildings.

These for REDWatch would be the worst possible outcomes for public tenants – the challenge is to make sure that they do not happen and to lock in both the government and opposition commitments necessary to renovate and renew public housing stock to deliver a harmonious higher density community over an extended time frame.

Such issues need community consideration and not just the specifics of the proposed planning controls which are covered below.

### **BEP2 Analysis of the Redfern & Waterloo Public Housing Area**

Section 2 of BEP2 contains a **Character Analysis (pp13-29)** which provides an overview of the social, historical, economic and built environment of the Redfern-Waterloo area, with a focus on the Housing NSW sites. It also contains in Section 3 **Renewal Opportunities (pp31-63)** a detailed analysis of the renewal opportunities and potential through a detailed site analysis of each precinct, including individual block analysis. BEP2 uses this analysis for the development of a Desired Future Character Statement for each precinct, including desired building scale and density.

These sections provide the basis on which the RWA has formulated the proposed controls. Residents living in or bordering the development should check how the Report analyses their part of the estate and what it proposes for its future. If you have concerns regarding this aspect of the study these should be raised in your submission.

### **BEP2 – The Planning Framework - Details what can be built**

Section 4 of BEP2 details the proposed **Planning Frame Work (pp65-87)**. It is derived from the detailed site and urban design analysis outlined in Section 3.

## Appendix 1

This section sets out the Draft Planning Controls. Following their exhibition as a Planning Instrument, these will set the legal framework for the next stage of the delivery process and the eventual redevelopment that will take place. If the legal framework does not adequately capture BEP2's stated intent then that intent cannot be delivered.

Following the exhibition, Housing NSW will commence work on a Master Plan for the Redfern and Waterloo Public Housing Estates. The Redfern Waterloo Authority's successor the Sydney Metropolitan Development Authority (SMDA) will undertake further studies in the area before proposing formal planning controls for the BEP2 area.

BEP2 says the Master Plan is not expected to be ready until after the SMDA has completed its study. This means that the Planning Controls are not likely not to include findings from the Master Plan which involve the additional consultation on many important issues.

REDWatch is of the view that the Master Plan should be finalised before the SMDA exhibit its final Planning Controls. This is especially so since key areas such as the **Public Domain Strategy (Draft BEP2pp 74 – 75)** including proposed opening of road closures, the **Transport & Movement Strategy (Draft BEP2 pp 86 – 87)** and **Community Facilities (Draft BEP2 p 87)** have been left to be further examined as part of the Master Plan and the information contained in BEP2 documents is inadequate.

As the BEP2 timeline expects Planning Controls to be set before the finalisation of the HNSW Masterplan it is very important that people understand and make comment on BEP2 Planning Framework. To put it another way if you don't like the proposals for up to 12 storey buildings, the proposed increase in density (thousands of extra people coming in) or you do not believe the stated intent of BEP2 is reflected in the planning controls then **now** is the time to make your comment not during the Housing NSW Master Plan discussions.

Below REDWatch has tried to highlight the main issues in the Planning Controls, Urban Design Guiding Principles, the preliminary Public Domain Strategy and the Design Excellence Strategy.

It may be helpful to download Section 4 of BEP2 which contains the [Planning Framework](#) (PDF 3 Mb). We have indicated in each section below the pages we are referring to and provide the link to the draft control map at the bottom of the section if you wish to bring up just a particular map. Section 4 can be found at [www.redfernwaterloo.nsw.gov.au/other/bep2/bep2\\_section4.pdf](http://www.redfernwaterloo.nsw.gov.au/other/bep2/bep2_section4.pdf)

### **Land Use – what you can do where? (Draft BEP2 pp 68-69)**

In the Redfern and Waterloo consolidated Housing NSW sections of BEP most of the area is designated Residential as it was by the City of Sydney. The City of Sydney study proposed a mixed use band in Cope St (East side) while BEP2 introduces the proposed new Business Zones – Mixed use:

- Elizabeth Street (East side) and Walker Street (West side)
- Cope Street (East side), Cooper St (West side), McEnvoy (North side) & John St (South side)

The BEP2 zones cover the whole of the block and hence not only face some existing businesses but also face residential developments. There is no indication in BEP2 of how the proposed new zones may impact on existing business zones in Redfern & Waterloo. No figures have been supplied on the expected commercial floor space or the employment that may be created.

## Appendix 1

Analysis of BEP2 housing figures indicates that only 9,775 square meters of space may be available for business however a provision is also included that indicates that floor space for certain types of activity including community business, may be in addition to the floor space specified.

In BEP2 there is no provision for any zoned Recreation Zones in Redfern Waterloo only at South Eveleigh.

You can download the draft [Figure 25: proposed land use zoning](http://www.redfernwaterloo.nsw.gov.au/other/bep2/fig_25_proposed_land_use_zoning_01.jpg) map (jpg file size 0.99 Mb) from [www.redfernwaterloo.nsw.gov.au/other/bep2/fig\\_25\\_proposed\\_land\\_use\\_zoning\\_01.jpg](http://www.redfernwaterloo.nsw.gov.au/other/bep2/fig_25_proposed_land_use_zoning_01.jpg)

### **Floors Space – How dense will the development be? (Draft BEP2 pp 70-71)**

The Controls proposed allow for 60.4 hectares of floor space excluding items like open balconies, voids or required car parking that are not included as floor space. BEP2 has used an average size of 85 sq m /unit to calculate the space taken by its 7,000 units rather than different sizes related to a mix of bedsits and units of different numbers of bedrooms. The balance is left for business use.

REDWatch has used the RWA's 85 sq m / unit figure to do an analysis of the entire site and to show how this is distributed across each block. It gives a the capacity for 7108 such units across BEP2 Redfern and Waterloo HNSW sites. This is just a guide for each site. Some existing HNSW units such as in Purcell average under 85 sq m / unit at the moment and there may be a larger number of smaller units required for public housing than is required for the private market. This could result in the number of infill units around the high rise being larger than REDWatch's calculated estimates.

BEP2 proposes floor space of between 2.5 and 3 times the land area for all the sites except Purcell which is proposed to be set at twice land area. BEP2 proposes 15.7 hectares more floor space than proposed by the City of Sydney. This is an increase of 35% and increases the floor space ratio from an average of 2.03:1 for the City of Sydney Draft Controls to an average of 2.75:1 for the BEP2 draft controls.

BEP2 proposes that "where appropriate" the floor area for "local retail, community orientated commercial activities, and social infrastructure/services" be excluded from the floor space for a particular block. This means that the floor space for such activities may be in addition to floor space available on a site. The RWA has clarified that its intention is that "only community uses and social enterprises are intended to be excluded from the FSR controls". This needs to be reworded in the proposed controls to avoid any ambiguity that would expanded commercial floor space.

All the existing high rise towers fit within the floor space proposed with some floor space available to build extra units next to them. If all the high-rises are retained then there will be a need for around 620 units averaging 85 sq m of "infill" housing to be built on the high-rise blocks to meet the BEP2 housing unit targets. This figure may be greater where the existing high-rise units average less than 85 sq m /unit. The actual floor space on these sites was not available to us so we are unable to estimate exactly what infill can be created. You can see REDWatch analysis block by block at – [www.redwatch.org.au/RWA/bep2/110212redw/download](http://www.redwatch.org.au/RWA/bep2/110212redw/download)

You can download the draft [Figure 26: proposed floor space ratio](http://www.redfernwaterloo.nsw.gov.au/other/bep2/fig_26_proposed_floor_space_ratio_01.jpg) map (jpg file size 1.13 Mb) from [www.redfernwaterloo.nsw.gov.au/other/bep2/fig\\_26\\_proposed\\_floor\\_space\\_ratio\\_01.jpg](http://www.redfernwaterloo.nsw.gov.au/other/bep2/fig_26_proposed_floor_space_ratio_01.jpg)

It should be noted that **BEP2 provides no population increase figures** – Population is normally linked to the floor space allowed and the number of people expected to live in the units provided. Using the information

## Appendix 1

in BEP2 REDWatch calculates an upper population figure of 11,000 new residents if the existing public and private occupancy levels were reflected in the redevelopment. Subsequent to BEP2 the RWA has indicated it expects a population increase of approx. 6,125. The rate used by the RWA of 1.75 seems low when compared to the Council's 2.02 people / unit used on multi-story dwellings which is based on the 2006 census. If there has been any increase in the number of people living in each unit since 2006 or if there is any increase in built density allowed by the time the units are built then the population impact will be even higher than current projections.

### **Height – how high can they stack the units? (Draft BEP2 pp 72 -73)**

In basic terms, floor space of 3 times the site area allows a three storey building over all the land, or a six storey building over half the land or a 12 storey building over a quarter of the land. Allowing tall buildings is one way of creating larger public spaces like Waterloo Green. Height and floor space interact to create the texture of a development across the site.

[Figure 29: artists impression of a possible application of the proposed planning controls](http://www.redfernwaterloo.nsw.gov.au/other/bep2/fig_29_artists_impression_of_proposed_planning_controls_01.jpg) on page 78 of BEP2 ([www.redfernwaterloo.nsw.gov.au/other/bep2/fig\\_29\\_artists\\_impression\\_of\\_proposed\\_planning\\_controls\\_01.jpg](http://www.redfernwaterloo.nsw.gov.au/other/bep2/fig_29_artists_impression_of_proposed_planning_controls_01.jpg)) gives some idea of how the density proposed translates into height compared to surrounding building heights. This diagram is important as it was used in the RWA newsletter and is the only place in newsletter that gave any indication of the infill housing proposed by BEP2 around Waterloo Green.

It is not possible to make a direct comparison between heights in BEP2 and council plans because BEP2 uses "Predominant Heights" while, in line with Department of Planning requirements, City of Sydney Council uses "Maximum Heights".

BEP2 proposes 6 and 8 storey Predominant Heights for the bulk of the area with an interface of 4 storeys with some lower adjoining areas.

In BEP2 8 Storey Zones buildings of up to 12 storeys are allowed if the 12 storeys section does not cover more than 20% of the block. If you compare the Council's proposed heights with BEP2 heights in many cases the Council heights are taller even though the BEP2 density is greater.

REDWatch is of the view that BEP2 should presented height controls as maximum heights in line with the Department of Planning's requirement for council LEPs.

While the floor space of the existing high-rise fit the BEP2 floor space controls the height of the existing high-rise are much taller than allowed if they were to be rebuilt in line with BEP2. This means that in 30 or so years, when the high-rise come to the end of its economic life, the replacement buildings can contain the same number of units but could be rebuilt within the new height requirements covering a larger land area.

You can download the draft [Figure 27: proposed building heights](http://www.redfernwaterloo.nsw.gov.au/other/bep2/fig_27_proposed_building_heights_01.jpg) map (jpg file size 1.14 Mb) from [www.redfernwaterloo.nsw.gov.au/other/bep2/fig\\_27\\_proposed\\_building\\_heights\\_01.jpg](http://www.redfernwaterloo.nsw.gov.au/other/bep2/fig_27_proposed_building_heights_01.jpg)

### **Urban Design Guiding Principles (Draft BEP2 pp 66 – 67)**

BEP2 proposes to include in the Planning Controls – Urban Design Guiding Principles. Similar principles were not included in the BEP1 Planning Controls. The Draft Urban Design Guiding Principles cover the BEP2 Vision,

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the community, the public domain and open space, extra land use provisions, urban street patterns, built form, design, environment and heritage.

While floor space, land use and height define only what is built some of the Design Principles deal with who will live in the area – such as the 40% social 60% private housing mix and even the sustainability of the community.

It is important that people comment on the Draft BEP2 Urban Design Guiding Principles. Particular thought should be given to what needs to be in the Design Principles to ensure that the spirit and detail of the RWA / HNSW proposal flow through into the Development Controls.

How for example do you ensure the Controls actually “create a sustainable community represented by a mix of social affordable and private housing”? Is there a way in these Design Guiding Principles to ensure that HNSW renovates the high-rise in line with the staging of the redevelopment?

### **Design Excellence Strategy (Draft BEP2 p 76)**

The Design Excellence provisions developed in BEP1 are applied in BEP2 and will be included in the Planning Controls. BEP2 suggests many of the matters raised should also be considered in the Master Plan.

There are some design aspects which REDWatch believes are critical for new public housing which are not included. At a minimum all buildings should be designed so that they can be easily adapted to meet the changing needs of their tenants. REDWatch argues that the controls should require universal design standards that incorporate flexibility from the outset.

REDWatch is also concerned that Design Excellence seems only to relate to the built form presentation, such as the expensive blue tiles on feature walls in the recent Moorehead Street development rather than health and liveability. In the development, which trumpeted natural ventilation as part of its green star design rating no fly screens were installed. The units are situated in an area prone to mosquitoes in part because of the high water table nearby.

Thought needs to be given to what Design Excellence means in public housing and how this can be incorporated into the controls.

### **The Issues needing further Work**

There are three issues - the public domain, community facilities and transport and movement that are covered in the Planning Framework that indicate more work will be undertaken. BEP2 makes some indications of what is proposed in these areas but fails to mention other areas that should be locked into the Planning Framework and not left only for the Master Plan.

#### **a) Open Space and The Preliminary Public Domain Strategy (pp74-75)**

BEP2 states “The delivery of an enhanced public domain is a key outcome of the social housing renewal which the draft BEP2 seeks to facilitate” and yet there is no commitment in BEP2 to any target for open space to ensure adequate open space is provided for the higher density population.

Depending on how you define the area, Redfern Waterloo has open space between 5.9 and 6.9 square metres / person compared to the City of Sydney Council area average of 11.8 sq m/person. Historically 2.83



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hectares per 1,000 people (28.3 sq m / person) was in the Environmental Planning and Assessment (EPA) Act, but over time this has been removed. Green Square and other inner city developments set a target of 10 sq m / person.

While BEP2 talks about new parks and upgrading existing parks it also proposes decreasing some existing open space at Waterloo Green with infill housing around the high-rises.

The redevelopment must deliver at least 10 sq m open space/ person. While Redfern Park and Waterloo Park may be close it is imperative that this development must increase open space to cater for the increase in population. Any decrease in the per capita local open space of the Redfern and Waterloo area should be resisted strongly.

More details on Open Space issues and BEP2 can be found in [REDWatch BEP2 Issues : Open Space - PDF Leaflet](http://www.redwatch.org.au/RWA/bep2/110214redw) (www.redwatch.org.au/RWA/bep2/110214redw). REDWatch encourages residents to cover the need for a per capita open space target in the controls and for public parks to be protected by land use zoning.

The public domain strategy section of BEP2 also deals with the removal of street closures. This proposal has concerned many at Poet's Corner who were involved in the campaign for closures. Included in the proposed street closure removals is Kettle Street which was wrongly depicted as remaining a street closure with public open space in a sketch in the RWA's BEP2 newsletter. This section of BEP2 also deals with laneway upgrades and through site links.

### **b) Preliminary Transport and Movement Strategy (p86)**

This one page in BEP2 refers to the [Parsons Brinckerhoff Transport and Traffic Study](http://www.redfernwaterloo.nsw.gov.au/other/bep2/traffic_report.pdf) which can be downloaded from www.redfernwaterloo.nsw.gov.au/other/bep2/traffic\_report.pdf . This study investigated the likely traffic generated by the proposed planning framework and concluded that "the proposed planning framework would result in only a modest impact on the traffic performance on the surrounding road network". Traffic issues proved a major concern in BEP1. When council undertook its own traffic study in Darlington many of the RWA North Eveleigh recommendations were not accepted.

BEP2 also proposes using a 60% non-car travel mode share target for travel to and from the BEP2 area. The study seems focused on travel to and from the city or via Redfern Station. Public local transport options especially east west transport links are noticeably missing. How people get to hospitals, shopping centres, regional open space and sports grounds for kids sport are totally missing. The Village to Village bus which is continually under funding threat gets acknowledged with a graphic on page 23 of BEP2 but there important service it is not mentioned at all in the Transport Strategy. To remove the need for cars the linkages people need for their day to day activities have to be provided.

BEP2 also proposes "promoting reduced car parking rates, generally in accordance with the controls outlined in the City of Sydney's draft LEP 2010". BEP2 does not mention the maximum number of car spaces per dwelling but the Appendix B report does. For the private tenants in the BEP2 Redfern and Waterloo areas they are as follows: 1 bed studio 0.2; 1 bed apartment 0.4; 2 bed apartment 0.8; 3 bed apartment or townhouse 1.1. The allowance for public tenants is proposed to be 60% of that for private tenants. This means for 1 bed apartments private tenants will have an allowance of 1 car space per 2.5 units while public tenant's in the same size unit will have 1 car space for every 4.16 units.

While BEP2 parking study found spare parking capacity REDWatch is aware of complaints being made in Waterloo about commuter parking creating problems for local residents. Such problems are set to increase

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with increased density and as people in new developments lose any right to qualify for on street parking permits.

This area needs a lot more work if the problems being experienced in Alexandria as a result of the ATP Chanel 7 development are not to be repeated in this redevelopment.

### **c) Community Facilities (p87)**

The RWA and HNSW have commenced a detailed review of the provision and adequacy of community facilities in and within the vicinity of the Redfern Waterloo Operational Area. There is already a demonstrated need for new community facilities in the public housing estates so this needs careful consideration.

The Urban Design Principles on page 66-67 allow additional floor area for social infrastructure, local retail and community orientated commercial activity and for the conversion of underutilised spaces at ground floor level within existing towers to community uses, studios and workshops.

One area that REDWatch believes should be explored is the possibility of facilities like swimming pools and gyms being open to the entire community rather than just located in private developments. If the aim of BEP2 is to promote greater social mix then there have to be places for interaction. Shared facilities provide an opportunity for mixing and counter the trend of large private development to become gated communities.

## **What is not provided for in BEP2 - Developer & Government Contributions?**

### **a) Developer Contributions**

BEP2 makes no proposals for the application of a Developer Contributions Plan.

The entire redevelopment seems to be constructed around private development providing some funding for new Housing NSW housing and Affordable Housing in exchange for government land and favourable Development Controls. Details of the financial modelling showing expected Government and Developer Contributions towards stock renovation and renewal and the expected income from land sales should be made available.

How the 700 new public housing units to be removed from Redfern and Waterloo will be funded and where they will be located should also be made clear. It should also be disclosed if and how other Housing NSW properties in Redfern and Waterloo will be renovated or renewed and if this is funded by the BEP2 development.

### **b) How will Affordable Housing be funded and operate**

BEP2 aims to deliver 700 affordable homes but the RWA has still not delivered an Affordable Housing Plan (expected last December) or explained how the Affordable Housing is to be paid for or how it will operate.

Much has been said about Affordable Housing for Key Workers. Will BEP2 affordable housing also make provision for public tenants who may gain employment and as a result no longer qualify for public housing but not earn enough to rent privately in the area?

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The current RWA Affordable Housing Contributions Plan only applies to the BEP1 area and is calculated at the cost of 1.25% of the Gross Floor Area. In BEP2 if the high-rises are all retained for public housing then affordable housing will be 14.53% of all new housing or 16.66% if HNSW properties are excluded.

REDWatch is of the view that the Affordable Housing under BEP2 must be in addition to the Affordable Housing already announced for North Eveleigh where “between 12% and 16% of residential dwellings on the site [will] be affordable housing – which breaks down to between 150 and 200 dwellings, depending on size,” (Minister Sartor release 26 April 2008). The Affordable Housing at North Eveleigh is to be primarily funded by the Affordable Housing Levy paid by Fraser’s from the former Carlton United Brewery site.

### **What Next – The Housing NSW Master Plan**

The Housing NSW Master Plan will provide the finer level detail for the proposed redevelopment of the Redfern and Waterloo public housing estates. As indicated BEP2 defers some important issues to this study. As a result it is important that those concerned about BEP2 redevelopment also provide input to the Master Plan. The Master Plan will however be formed within the framework provided by BEP2’s proposed controls.

The RWA’s successor the Sydney Metropolitan Development Authority (SMDA) will undertake a Urban Renewal Study of Redfern and Waterloo before finalising the draft BEP2 controls and placing them formally on exhibition. The preliminary Master Plan is not expected to be settled until after the Urban Renewal Study is released and the Development Controls become Planning Law.

### **Submission Deadline – Close of Business Monday 28 February 2011**

Written submissions should be sent to: Attention: Redfern-Waterloo BEP2 at Redfern-Waterloo Authority, PO Box 3332, Redfern NSW 2016 Or emailed to: [redfernwaterloo@rwa.nsw.gov.au](mailto:redfernwaterloo@rwa.nsw.gov.au)

Information on BEP2 can be found on line at [www.redfernwaterloo.nsw.gov.au/bep2/index.php](http://www.redfernwaterloo.nsw.gov.au/bep2/index.php) or physical copies are available for inspection at the Council’s Redfern Service Centre, The RWA Offices and Waterloo Library. If you need assistance finding information ring the RWA on 9202 9100.

This Information Sheet has been produced by REDWatch.

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*REDWatch is a residents and friends group covering Redfern Eveleigh Darlington and Waterloo (the same area covered by the Redfern Waterloo Authority). REDWatch monitors government activities such as the RWA and seeks to ensure community involvement in all decisions made about the area. More details can be found at [www.redwatch.org.au](http://www.redwatch.org.au).*

Version: 15 Feb 2010 b

Appendix 2

**Floor Space Increase Calculations - Draft BEP2 Compared with CoS Proposed (HBO+EMTB 2006)**

Precinct	Block		Site Area	Floor Space Control		Total Floor Space			
			ha	CoS Study	BEP2	CoS FS	BEP2 FS	FS Increase	% change
A	1	Walkup Apartments	1.32	2	2.75	2.64	3.63	0.99	37.50%
	2	Walkup Apartments	0.69	2.5	2.5	1.725	1.725	0	0.00%
	3	Walkup Apartments	0.88	1.75	2.5	1.54	2.2	0.66	42.86%
	4	Purcell	0.23	1.75	2	0.4025	0.46	0.0575	14.29%
B	5	Walkup Apartments	0.87	2.5	3	2.175	2.61	0.435	20.00%
	6	McKell	0.92	3.5	3	3.22	2.76	-0.46	-14.29%
	7	Walkup Apartments	0.7	1.5	3	1.05	2.1	1.05	100.00%
		PCYC	0.36	1.5	3	0.54	1.08	0.54	100.00%
	8	Recently Completed Costruction	0.97	2	2.5	1.94	2.425	0.485	25.00%
F	9	Poet's Corner	2.04	2	2.5	4.08	5.1	1.02	25.00%
	10*	Endeavour Project Infill (+330 Apts)	1.76	2	3	3.52	5.28	1.76	50.00%
			1.44	2.5	3	3.6	4.32	0.72	20.00%
	11	Walkup Apartments	1	1.75	3	1.75	3	1.25	71.43%
	12	Walkup Apartments	0.96	2	2.5	1.92	2.4	0.48	25.00%
	13	Infill (+77 Apts) Banks and Cook Bldgs	1.97	2	3	3.94	5.91	1.97	50.00%
	13A	Shop Site	0.27	2	2.5	0.54	0.675	0.135	25.00%
	G	14	Terrace	0.19	1.75	2.5	0.3325	0.475	0.1425
	14A	Walkup Apartments	0.19	1.75	2.5	0.3325	0.475	0.1425	42.86%
	15	Walkup Apartments	0.62	2	2.5	1.24	1.55	0.31	25.00%
	16	Walkup Apartments	1.13	1.75	3	1.9775	3.39	1.4125	71.43%
	17	Mt Lachlan	0.66	1.75	2.75	1.155	1.815	0.66	57.14%
	18	Dobell	0.75	1.75	2.5	1.3125	1.875	0.5625	42.86%
	19	Madden Place	1.025	1.75	2.5	1.79375	2.5625	0.76875	42.86%
	20	Drysdale	0.37	2	2.5	0.74	0.925	0.185	25.00%
	21	Camellia Grove	0.67	1.75	2.5	1.1725	1.675	0.5025	42.86%
<b>TOTALS</b>		<b>Redfern &amp; Waterloo Consolidated</b>	<b>21.985</b>			<b>44.63875</b>	<b>60.4175</b>	<b>15.77875</b>	<b>35.35%</b>
		<b>Indicative FSR - Development space/land</b>				<b>2.03</b>	<b>2.75</b>	<b>0.72</b>	
In Block 10 Assumed 3.2ha split 55% at 2:1 and 44% 2.5:1 based on Raglan frontage									
			Existing						
H	25	South Eveleigh	1.16	0.5	2.5	0.58	2.9	2.32	400.00%
	26		0.32	2.2	2.5	0.704	0.8	0.096	13.64%
<b>TOTALS</b>		<b>South Eveleigh</b>	<b>1.48</b>			<b>1.284</b>	<b>3.7</b>	<b>2.416</b>	<b>188.16%</b>
		<b>Indicative FSR - Development space/land</b>				<b>0.87</b>	<b>2.50</b>	<b>1.63</b>	

Source: Compiled by REDWatch from Draft RWA BEP2 Exhibition Report Appendix A and Renewal Strategy Tables - January 2011

## Comparison of Number of New Units (@ 85 sm / unit) with Existing Units showing Infill & Redevelopment Potential

(These Figures show what can be built where under BEP2 if the Highrise are retained as proposed - Existing Blue & Potential Red)

Precinct	Block		Site Area ha	FSR BEP2	BEP2 FS ha	Current Units	Units @ 85 sm av	Potential Change	Existing Highrise	New Infill Highrise	Current low&mid	New units low&mid
A	1	Walkup Apartments	1.32	2.75	3.63	155	427	272			155	427
	2	Walkup Apartments	0.69	2.5	1.725	52	203	151			52	203
	3	Walkup Apartments	0.88	2.5	2.2	108	259	151			108	259
	4	Purcell	0.23	2	0.46	61	54	-7	61			
B	5	Walkup Apartments	0.87	3	2.61	130	307	177			130	307
	6	McKell	0.92	3	2.76	284	325	41	284	41		
	7	Walkup Apartments	0.7	3	2.1	18	247	229			18	247
		PCYC	0.36	3	1.08	0	127	127			0	127
	8	Recently Completed Costruction	0.97	2.5	2.425	106	285	179			106	285
F	9	Poet's Corner	2.04	2.5	5.1	576	600	24	576	24		
	10*	Endeavour Project Infill (+330 Apts)	1.76	3	5.28	421	621	200	421	200		
			1.44	3	4.32	416	508	92	416	92		
	11	Walkup Apartments	1	3	3	99	353	254			99	353
	12	Walkup Apartments	0.96	2.5	2.4	109	282	173			109	282
	13	Infill (+77 Apts) Banks and Cook Bldgs	1.97	3	5.91	426	695	269	426	269		
	13A	Shop Site	0.27	2.5	0.675	0	79	79			0	79
G	14	Terrace	0.19	2.5	0.475	10	56	46			10	56
	14A	Walkup Apartments	0.19	2.5	0.475	18	56	38			18	56
	15	Walkup Apartments	0.62	2.5	1.55	60	182	122			60	182
	16	Walkup Apartments	1.13	3	3.39	98	399	301			98	399
	17	Mt Lachlan	0.66	2.75	1.815	52	214	162			52	214
	18	Dobell	0.75	2.5	1.875	95	221	126			95	221
	19	Madden Place	1.025	2.5	2.5625	110	301	191			110	301
	20	Drysdale	0.37	2.5	0.925	34	109	75			34	109
21	Camellia Grove	0.67	2.5	1.675	65	197	132			65	197	
<b>TOTALS</b>	<b>Calc Redfern &amp; Waterloo Consolidated</b>		<b>21.985</b>		<b>60.4175</b>	<b>3503</b>	<b>7108</b>	<b>3605</b>	<b>2184</b>	<b>626</b>	<b>1319</b>	<b>4304</b>
	Figures in BEP2					<b>3503</b>	<b>7000</b>	<b>3497</b>	<b>2184</b>			
	Difference / Buffer					<b>0</b>	<b>108</b>	<b>108</b>				

Notes: The Precincts and Blocks above are those on BEP page 35 - 2.35 MB Download from : [www.redfernwaterloo.nsw.gov.au/other/bep2/fig\\_13\\_precinct\\_blocks\\_01.jpg](http://www.redfernwaterloo.nsw.gov.au/other/bep2/fig_13_precinct_blocks_01.jpg)  
 These calculations are based on RWA's 85sm average. It is likely HNSW highrise stock is under this so there may be greater infill potential as shown in Appendix A  
 Commercial Floor Space comes from the extra 115 units (-7 over does not offset), size below 85sm average & any developer uplift  
 If 75sm /unit is used as RWA indicated some developments used there would be an extra 948 units added  
 HNSW occupancy figures are lower than the private market so it is possible that there will be more smaller units in the HNSW stock than in the private market.  
 The current density of the existing high rise is covered in the FSR calculations only Purcell is slightly over by 7  
 BEP2 contains no population figures. Projections depend on the occupancy expected. RWA has now indicated a BEP2 population increase of 6,125 however the 1.75 occupancy used by the RWA is lower than the city wide 2.05 (2006 census) used by the City of Sydney for projecting residential activity and these projections need testing.

\* In Block 10 Assumed 3.2ha split 55% at 2:1 and 44% 2.5:1 based on Raglan frontage



Redfern, Eveleigh, Darlington & Waterloo Watch Group

## **BEP2 ISSUES: OPEN SPACE**

### **What's the problem?**

The Redfern Waterloo Authority (RWA) in their plan for the redevelopment of the consolidated public housing estates propose 3500 new apartments over the next 20-25 years. No population projections were included in the BEP2. A recent RWA estimate indicates a population increase of 6,125 (1.75 people per new private unit). CoS project multi-story buildings at 2.05 people per unit giving an extra 7,175 people. BEP also proposes "infill" housing around the high-rises such as Waterloo Green reducing space.

The BEP2 says it is to "deliver an enhanced public domain, including new parks, open space and improvements to the existing public domain". The draft planning controls do not reserve specific areas in Redfern and Waterloo for public parks or make a commitment to achieve a per capita target for the increase in population. Open Space is left to the subsequent Housing NSW Master Plan (see overleaf).

REDWatch is concerned that unless the planning controls provide for adequate per capita public space from the outset that the required level of public space for the new population will not be delivered.

### **Why does this matter?**

Redfern-Waterloo's open space is already well below the standard originally set in the Environmental Planning and Assessment Act (EPA Act) of 2.83 hectares per 1,000 people - that's 28.3 square metres per person. The City of Sydney public space in the Inner South Region, which covers the proposed development, has a square meter per person average of 6.9 compared to the city average of 11.8. Recent planning in Green Square and Victoria Park has a target of 10sqm per person.

Whether the standard used is the initial EPA Act, the Redfern-Waterloo area, the City, or the new developments the only conclusion is that the area has too little open space before more people move in. BEP2 should also set a minimum 10 square metres per person target for Redfern and Waterloo. The area may be surrounded by district and regional parks but these are not local open space.

### **What's wrong with trying to make district and regional parks offset low local open space?**

This suggestion ignores the realities of daily life in Redfern-Waterloo. Half the households do not own a car and so rely on public transport for access to district and regional open space. However, the local public transport services are inadequate for this purpose, as they primarily pass through the area on their way to or from the city. This creates open space access problems for people who are elderly and/or infirmed and for families with young children.

Residents are therefore forced to seek more indoor (and passive) recreation pursuits, or - if they do have a car - to generate greenhouse and other negative effects by driving to wherever district or regional open space is located (assuming they can park when they get there!).

### **What do we need?**

What we need is local, usable, public open space - and not just bits of paved/landscaped area around shops or private open space within or around new apartment blocks.

### **How do we get it?**

By persuading the RWA & HNSW to create zoned public open space in the final planning controls.

### **Why does open space need to be zoned in?**

Unless it is zoned in, we're unlikely to get the quantity and quality required. If there is no provision for open space in the controls then open space has to compete with the floor space allocated to the block - you have to stack the floor space higher in taller buildings to get a sizable park. The Master Plan must make provision for adequate public parks and space and the land use controls need to zone for it.

### **What can we do about it?**

Write to the RWA by 5.00 pm on Monday 28 February letting it know how important local open space is to you - and why - and that you want it zoned into the final Built Environment Plan 2 controls.

## What the RWA Built Environment Plan 2 Planning Framework say about Open Space:

### 4.4 Preliminary Public Domain Strategy (Page 74)

The delivery of an enhanced public domain is a key outcome of the social housing renewal which the draft BEP 2 seeks to facilitate. One of the key objectives of the draft BEP 2 is to achieve an enhanced public domain by:

- Providing new public parks and open space, and improving the quality of existing parks and open spaces;
- Ensuring parks and open spaces are well-designed, useable, accessible and safe and comply with Crime Prevention through Environmental Design (CPTED) principles;
- Ensuring quality landscaping of the public domain, including the retention of established vegetation where appropriate;
- Improving the safety and design of pedestrian and cycle links and provide new site linkages to maximise permeability within the social housing sites and accessibility to the surrounding neighbourhood, local shops, community facilities and other services; and
- Incorporating environmental sustainable practices in the design of the public domain.

This is reinforced by the urban design guiding principles relating to “Public domain and open space” identified in 4.1 and repeated below.

- Create a quality public domain which signals and supports a successful community.
- Provide for attractive, well located, clearly defined, safe and usable open spaces and pedestrian linkages.
- Provide private open space to all dwellings in the form of courtyards, terraces, balconies or roof top gardens.
- Delineate the progression of spaces from public to private and provide a clear definition of territory and ownership of all spaces.
- Facilitate resident surveillance of public and common areas.
- New public open spaces to be contiguous with streets, highly visible and overlooked.
- Review the existing landscape qualities in streets and open spaces to maximise amenity and safety and create of new high quality landscape design for public spaces. Respect existing quality streetscapes.

The public domain objectives and urban design guiding principles will provide an important basis for the development of a detailed public domain and open space strategy, which will form part of the Master Plan to be developed by HNSW, following the finalisation of the planning framework.

It is important that the planning controls proposed in the draft BEP 2 are supported by key strategies and commitments relating to public domain. Accordingly, a Preliminary Public Domain Strategy has been developed as part of the draft BEP 2 planning framework. The Strategy relates to the public domain within and around the Redfern and Waterloo HNSW sites. The key elements of the Preliminary Public Domain Strategy are outlined below, which will form the basis of a detailed public domain strategy to be prepared with the Master Plan.

#### New parks and open spaces

- The renewal of Redfern and Waterloo HNSW sites is to make provision for new public parks and open spaces. The location of future parks and open spaces is to be identified within the future Master Plan, in close consultation with the Social housing residents, as well as the wider community.
- New public parks and open spaces should be located along street frontages to maximise accessibility and visibility.
- New public parks and open spaces should accommodate facilities appropriate for the envisaged uses and functions i.e. playgrounds, seating, lighting, shading, etc.
- New public parks and open spaces are to be designed in accordance with Crime Prevention Through Environmental Design (CPTED) criteria to maximise safety of the spaces for users.
- New public parks and open spaces are to incorporate environmentally sustainable features in their design e.g. water sensitive urban design.
- New public parks and open spaces are to incorporate landscaping and appropriate tree planting to maximise the use and amenity e.g. adequate sunlight, daylight and shade, while minimising opportunities for crime and anti social behaviour.

#### Upgrade of existing parks and open spaces

The renewal of the Redfern and Waterloo HNSW sites is to provide for the upgrading the existing parks and land used as open space to ensure:

- Maximum use and enjoyment of these spaces by the community.
- Improve safety and security within the parks and open space.
- The facilities provided within the parks and open spaces (playgrounds, etc) are most appropriate for those using the parks and open space.
- Existing landscaping and vegetation does not adversely impact on the amenity, use or safety of the parks and open space.