

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



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## About NCOSS

The Council of Social Service of NSW (NCOSS) is the peak body for the not-for-profit human services sector in New South Wales. NCOSS works with its members on behalf of disadvantaged people and communities towards achieving social justice in NSW. NCOSS provides an independent voice on welfare policy issues and social and economic reforms and is the major coordinator for non-government social and community services in NSW.

Further details about NCOSS are available on our website at [www.ncoss.org.au](http://www.ncoss.org.au)

## Introduction

NCOSS welcomes the opportunity to comment on the draft Redfern-Waterloo Built Environment Plan Stage 2 (BEP2). We have had a long-standing interest in issues around the redevelopment of the public housing estates and have been represented on Housing NSW's Living Communities Consultative Committee since its inception. That Committee has provided an effective forum for the engagement of NGO peaks and other key stakeholders in the Living Communities redevelopments – Bonnyrigg, Minto and Airs/Bradbury.

Building on the Living Communities experience, NCOSS has sought the development of a formal protocol to outline an agreed process of engagement with tenants, NGOs and councils in the process of redeveloping social housing areas, as well as the establishment of shared equity home purchase scheme for social housing tenants who have the means to sustain a modest mortgage and measures to improve the training and employment opportunities for households living in social housing<sup>1</sup>.

## Public housing in Redfern Waterloo

Social housing has long played an important role in the Redfern Waterloo area. Redfern Waterloo in turn forms a significant part of the state's overall social housing portfolio.

There are currently some 4,300 social housing dwellings within the Redfern Waterloo Authority Operational Area, comprising some 44% of the total number of

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<sup>1</sup> See 'Regeneration of Public Housing Estates', Better Planning & Infrastructure chapter, *Vote 1 Fairness in NSW* (NCOSS 2011 state election platform), NCOSS March 2010 p. 46 available online at [www.ncoss.org.au](http://www.ncoss.org.au)

dwellings. This figure includes some 700 dwellings located outside of the sites covered by the draft BEP2, including some infill apartment buildings and a considerable number of terraces, duplexes, semi detached and detached houses, some of which are heritage listed and/or located in a designated Conservation Area.

Housing NSW's housing in the BEP2 area includes:

- 11 high rise apartment towers (between 8 and 29 storeys in height) incorporating 2,184 dwellings, and home to around 2,800 people, and
- 1,019 dwellings in a range of walk up apartment buildings (without lifts) and a further 194 dwellings in a number of medium rise (4 to 7 storey) buildings.

The high rise towers were built between 1966 and 1976 and are considered to be suitable for continued use, with appropriate refurbishment and ongoing repairs and maintenance, for at least another 30 years. They are predominantly home to an ageing population of single persons (70%) and couples without children. Many of the high rise tenants have lived in the same building for a considerable period of time (60% for over 15 years)<sup>2</sup>.

## **The draft Built Environment Plan 2 (BEP2)**

The other recent public housing estate redevelopments that NCOSS has commented on, such as those in Bonnyrigg and Minto, have involved low rise outer suburban areas. In these areas there has been extensive community engagement in the development of a draft Concept Plan, prepared by Housing NSW. This draft Concept Plan, plus a range of supporting material including a Social Impact Assessment, has then been placed on public exhibition by the designated consent authority.

In these plans the likely impact of the redevelopment on particular streets and households has been immediately apparent, a staging plan for the redevelopment has been released and proposed rehousing measures have been outlined.

The draft BEP2 for Redfern Waterloo, prepared by the Authority in conjunction with Housing NSW, is a markedly different exercise. Essentially it canvasses proposed changes to land use zones, building heights, and floor space ratios to enable more intensive development of Housing NSW's landholdings over an extended period of time. The intention is to significantly increase the total population of the area and at

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<sup>2</sup> Taken from the draft BEP2 see p. 18-19.

the same time provide a mix of social, private and affordable housing on sites that are currently totally public housing.

The overall strategy detailed in the draft BEP2 is to, over time, double the total number of dwellings located on the relevant Housing NSW sites, from the current 3,500 to around 7,000 at the conclusion of the redevelopment. In addition the draft BEP2 proposes a massive change in the composition of the housing concerned as follows:

- Reducing the number of social housing dwellings from 3,500 to 2,800 (representing 40% of the final total number of dwellings),
- Transferring 700 social housing dwellings to other site(s), not yet specified, within the City of Sydney LGA,
- Providing 3,500 private dwellings (50% of the final total), and
- Providing 700 affordable/intermediate dwellings (10% of the final total).

The BEP2 does not set out a draft Concept Plan for the sites concerned. The closest it comes to this is Figure 29 on p. 78 which reproduces an artist's impression '*of a possible application of the proposed planning controls*'. There is insufficient detail in this figure to enable a member of the public to confidently identify particular sites or buildings.

Beyond these headline targets, key elements of the redevelopment plan are missing:

- It is not made clear what proportion of the eventual number of public housing dwellings will be new and what proportion will be refurbished. Some have assumed that the intention is that the high rise towers, containing almost 2,200 dwellings, will remain 100% public housing but NCOSS understands this is not necessarily the case.
- It is not clear where the 700 replacement social housing dwellings within the City of Sydney LGA will be located.
- It is not clear how much of the private and affordable/intermediate housing will be new stock built on land currently occupied by the Housing's walk up flats and medium density buildings, and how much will be refurbished stock located in Housing's existing high rise towers.
- It is not clear what tenancy management arrangements are envisaged for the social housing and affordable/intermediate housing within the BEP2 area, including whether some of the public housing might be transferred to community housing.
- It is not clear what will be the underlying financial strategy for the redevelopment.

- It is not clear what is intended in the long term for the designated Conservation Area, where a considerable number of social housing tenants live.

**In the absence of so much essential information, it is impossible for NCOSS to indicate whether or not we are in agreement with the draft Plan.**

NCOSS therefore submits the following broad responses:

1. Any doubling of the number of dwellings in such a defined location will clearly require additional community facilities, community services, public transport, walking and cycling facilities, open space and space for shops and other commercial activities.
2. A Rehousing Strategy for existing social housing tenants needs to be developed, in conjunction with tenant representatives and the NGO sector, to detail categories of tenants who may need to be permanently relocated, and those who may need to be temporarily relocated but can return to the area, and period of notice and extent of assistance (including advocacy assistance) that will be provided to them. As part of this Strategy no existing tenant should be required to move out of the inner city area in order to remain in social housing.
3. The redevelopment is likely to generate both new opportunities and adverse consequences for the existing and future social housing tenant population. A full scale Social and Health Impact Assessment must be conducted by external consultants to systematically assess these risks and opportunities and suggest suitable mitigation strategies<sup>3</sup>.
4. The proposed location(s) of the replacement social housing within the City of Sydney LGA need to be identified.
5. Those buildings and sites that are not designated for redevelopment in the near term (say the next 5 years) must continue to have access to repairs and

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<sup>3</sup> Housing NSW and its partner agencies have recently conducted a sophisticated social and health impact assessment in relation to the proposed redevelopment of Airds Bradbury, in Campbelltown LGA. NCOSS understands that the outputs from this exercise will be publicly released in the near future.

maintenance and refurbishments to avoid the creation of 'have' (new or refurbished) and 'have not' (decaying and run down) precincts within the area's social housing.

6. A clear draft plan for the provision of affordable/intermediate housing within the BEP2 area needs to be developed as a high priority and be placed on public exhibition. (NCOSS notes its disappointment at the continuing delay with the release of the overall affordable housing plan for Redfern Waterloo, which is long overdue)<sup>4</sup>.
7. Consideration should be given to the development of a government-backed shared equity scheme to assist social housing tenants who have the means to sustain a modest mortgage to purchase housing in Redfern Waterloo and other public housing redevelopment areas. (Any dwellings so purchased to be counted as part of the private housing component of the development).
8. The redevelopment must incorporate a rigorous and independent longitudinal study of the outcomes experienced by the residents, with the results to be made publicly available on a regular basis.

## **Conclusion**

As indicated above, NCOSS considers that the draft BEP2 provides insufficient information for us to make an informed judgement about the likely outcome of such a major redevelopment. We request that the next stage of the process – the overall urban renewal plan for Redfern Waterloo – more clearly indicate what is proposed and detail what further planning and community engagement will need to be included in the promised Master Plan for Housing NSW's properties in the area.

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<sup>4</sup> NCOSS has raised this matter in at least 3 previous submissions to the Authority.