

South Sydney Greens



**Submission on Redfern Waterloo Built Environment Plan
Stage 2**

February 2011

To Whom It May Concern:

The attached submission has been produced by the South Sydney Greens, the local branch of the NSW Greens party.

As long time residents of the area, including a number of public housing residents, private market renters and homeowners who are passionate about social and environmental issues we feel that we have a number of important insights to share on the issues raised.

We thank the RWA for all the work they have put into preparing this Plan and are grateful for the opportunity to comment on the Draft Built Environment plan 2.

Should you wish to discuss any of the matters raised please contact Councillor Irene Doutney on 9265 9700.

SUBMISSION ON BUILT ENVIRONMENT PLAN 2 (BEP2)

PHILOSOPHY:

(1) Public Private Partnerships (PPP)

The South Sydney Greens (SSG) strongly oppose the selling off of public housing land for private development and sale to property investors. In a time when over 43,000 people are stuck on the public housing waiting list, to sell off public land is inappropriate and totally lacking in social vision and hope for these people.

We accept that population growth needs to be met by medium density growth in urban renewal areas but believe that there are existing sites for such private development in the RWA area such as North Everleigh which is still waiting for urban development.

There is no evidence to suggest that private home ownership will be the result of any PPP. Rather, when this sell off happens many of the dwellings will become part of the rental market providing for transient tenants rather than stable homeowners.

It is well known that just as much anti-social behaviour is associated with these private rental buildings, such as drug dealing, late night party noise, lack of property upkeep and general anti-social behaviour, as are attributed to public housing buildings.

This will belie the claim that being around private market housing will provide stability and be uplifting for public housing residents and is the reverse of much overseas practice which saw small numbers of public housing tenants being moved into more upmarket areas.

We do not believe that the huge public land sell off in Bonnyrigg, which is mainly a private single lot residential development, is an appropriate model to consider when dealing with Redfern and Waterloo.

We also note that the PPP intended for the redevelopment of the blocks opposite Redfern Park in Elizabeth and Kettle Streets has never happened and the dwellings in this area have been boarded up for years now. This not only lessens the number of public housing dwellings but creates an eyesore in such a prominent area.

What guarantee is there that this will not happen when HNSW begins demolition of the walk-ups in Redfern and Waterloo? We also note the eyesore that is Rachel Foster Hospital which has been derelict for over two years.

Finally we believe that development will end up being driven by the needs and desires of private developers whose concerns will be with profitability rather than the aims of “social mix” theory or the well being of existing public housing tenants.

(2) Social Mix

The SSG believe that there is still much debate about the efficacy of “social mix” and that the RWA is merely accepting the work of government appointed academics rather than doing a wide ranging review of the literature that has come out in recent years (see references below). Their academic references have been cherry picked to match their rationale for selling off public land.

“Social Mix” is an easy rationale for the Government which will lead to the destruction of existing communities while claiming to create more diverse communities without acknowledging that HNSW communities are already diverse. It basically stigmatises the majority of HNSW residents who maintain successful tenancies and take pride in their homes.

We believe that selling off public land for private development does not create these utopian communities rather it creates opportunities for investors to buy up dwellings for rental apartments which can be just as anti-social and dysfunctional as any maligned HNSW estate.

We also fear that when development starts there could be a tendency to separate the private market buildings from the core of retained public housing high rise buildings and infill development, which will be the replacement buildings for the demolished walk-ups and could be segregated from the private dwellings around the edges of the estates.

We also note that many private market buildings come with swimming pools, gyms and other community resources which will not be provided to the public housing buildings thus creating a divide within the community between the haves and the have nots.

The Greens believe that poverty, inequality and the discrimination that goes with it are at the root of disadvantage and that if the Government really wanted to do anything about raising the standards of HNSW residents they would look to relieving the inequities of poverty which include lack of education, lack of selfesteem, lack of ambition and multiple health problems.

The continuing lack of proper maintenance by HNSW which has allowed many of these properties to fall into disrepair is a key issue which adds to the perception of housing estate dysfunction and tenant inequity.

The importance of a robust and extensive Human Services Plan has always been an essential part of any regeneration of the area and could do more to improving conditions in the estate than merely increasing the number and type of buildings.

We also note that there is no Social Impact Statement for a Plan that proposes to change the social mix of the area and do not believe that the BEP2 should go forward without such important work.

References:

http://www.griffith.edu.au/_data/assets/pdf_file/0004/81409/social-city-18-arthurson.pdf

http://www.feantsa.org/files/housing_wg/Husing%20WG%20Prague%202006/social_mix_theory_2005.pdf

<http://www.jrf.org.uk/sites/files/jrf/2066-segregation-mixed-communities.pdf>

<http://www.jrf.org.uk/publications/are-mixed-communities-answer-segregation-and-poverty>

http://download.audit.vic.gov.au/files/20100623_Social_Housing_Full_Report.pdf

http://download.audit.vic.gov.au/files/20100623_Social_Housing_Summary.pdf

<http://www.sheltersnsw.org.au/docs/sem1006estates-darcy.pdf>

<http://www.sheltersnsw.org.au/docs/sem1006estates-macfie.pdf>

<http://www.sheltersnsw.org.au/docs/sem1006estates-pinnegar.pdf>

<http://www.sheltersnsw.org.au/docs/sem1006estates-arthurson.pdf>

AFFORDABLE HOUSING

The SSG believe that the transfer of 700 public housing dwellings for affordable housing is totally unacceptable.

The % of affordable dwellings should come from the private component and not come at the expense of scarce public housing units. It is highly unlikely that 700 new public housing dwellings will be created within the City of Sydney LGA as there is very little land available for this type of development. Considering the incredible expense of land in the LGA and the pressures for private development we believe it is highly unlikely that 700 new public housing units will be created.

We believe that this is a terrible outcome that divides public and affordable housing residents in a way that has them competing for scarce housing resources and should be avoided at all costs.

Although we acknowledge the economic rationale for including private dwellings we believe that the majority of new housing should be affordable and public housing with a much smaller percent being private development.

We are also disappointed that the housing makeup did not include alternative forms of housing such as co-ops, collectives, land trusts, transitional housing and rent to buy schemes that allow tenants to buy their properties at a “social” price. These sorts of schemes could have more effect in creating community pride, diversity and social inclusion than the “social mix” proposed by BEP2.

What contributions will be made by the private developers towards affordable housing and why hasn't this been included in the Plan?

AFFORDABLE HOUSING LEVY & RWA AFFORDABLE HOUSING STRATEGY

The SSG are very concerned that there has been no sign of the Affordable Housing Strategy promised by the RWA before Christmas. This is especially true considering the plan to transfer 700 units of public housing to affordable housing. We are wondering what is happening with the millions of dollars that the RWA has been collecting as Affordable Housing Contributions from developments such as the CUB site (\$32,000,000 over 5 years).

We would also have questions regarding the Affordable Housing Contributions from any other developments in the area such as the RSL site and future payments from the private development within the Redfern and Waterloo Estates. How much of these developments have been costed for Voluntary Planning Agreements and/or S94 contributions?

We are also concerned about how this Affordable Housing is meant to be integrated into the estates. Will the housing be in separate buildings? Will it be intergrated into existing high rise buildings? Will it be intergrated into the private development? How will the rents be structured? Will they be one third of the renter's income or 75% of market rent?

PUBLIC HOUSING

The SSG believe that the loss of 700 public housing units on a vague promise to replace them somewhere in the LGA is totally unacceptable.

There is little land available within the LGA for any sort of public housing redevelopment of this size however scattered across the city it may be. The consistent refusal of developers to actually build affordable housing in their developments highlights the problems that would face any attempts to create new public housing.

The growing opposition of existing residents to any sort of social or affordable housing is concurrent with the growing gentrification of an area and it is hard to imagine any area in the LGA welcoming new social housing.

We also note that HNSW is selling off or leasing out some of its inner city properties and what we are seeing is a general loss rather than increase in public housing.

The BEP2 will see the ratio of HNSW tenants fall from 100% to a mere 40% with some areas where the walkups are situated decreasing even further.

There are also many unanswered questions around the fate of public housing tenants before, during and after redevelopment and although this is a question for HNSW we find it disappointing that some minimum framework for the coming dislocation of tenants was not considered.

The SSG are committed to increasing public and affordable housing and are incredibly disappointed in the fact that there is no increase in public housing in the “social mix” suggested for BEP2. We believe there should have been far more public and affordable housing and that 3,500 private dwellings on public land is a “sell off” of crucial public assets.

CONSULTATION PROCESS

The SSG have grave concerns about the consultation process, as the depth of information and the number of complex planning documents involved, make it almost impossible for a non professional to analyse the project in an educated manner within such a short time span.

To have a working understanding of what is proposed one would need to read a number of State Environment Planning Policies, City of Sydney Local Environment Plans (LEPs) and Development Control Plans (DCPs), South Sydney DCPs, the Metropolitan Strategy, the Flat Building Design Code etc. It would also be important to find and examine the CoS Urban Design Study for Redfern and Waterloo (2006) by HBO + EMTB. To imagine that residents of the HNSW redevelopment sites have the capacity or knowledge to do this is ridiculous and belies any attempt at proper consultation with the existing residents.

We acknowledge that the RWA/SMDA is now undertaking consultation but it is highly unlikely that the residents who will be most affected will be able to make considered decisions about this Built Environment Plan. It will be very difficult to ask the right questions without the detailed knowledge mentioned above. Without this knowledge consultation just becomes an information session which may tick the consultation box but doesn't mean true consultation.

True consultation would have preceded any Plan and would have involved asking the residents who are going to be affected how they would like to see their homes and communities developed in the future, if at all.

We acknowledge that the RWA and HNSW are attempting to inform people of the changes that will come about through BEP2 and the HNSW Master Plan but do not believe that residents fully understand how this will ultimately affect them.

We note that only about 10% of residents return to redevelopments years after they've been finished and do not believe that the discussions tenants are having on the street corners actually address the fact that their input is for buildings they will probably never live in.

DENSITY & HEIGHT

FSR:

The FSR is approx 30% above that recommended by the City of Sydney's 2006 study (Redfern and Waterloo Urban Design Study 2006 by HBO + EMTB Consultants) and when considered with the doubling of the population suggests that there will be an increase in the density and size of the buildings that will replace the current dwellings.

This increase in FSR and the increasing density of buildings and number of dwellings will lead to an overdevelopment of the site.

We fear that a dense monoculture of flat dwelling buildings will eventually dominate the area and spread from Green Square to the CBD slowly destroying the existing villages and communities in the area.

Height:

The SSG believe that the use of predominant heights in BEP2 rather than maximum heights is very misleading and vague. Most planning instruments are based on maximum heights and BEP2 should have been consistent with previous plans and studies of the area.

Predominant heights of 3 to 8 storeys do not tell the whole story and building heights could increase within individual buildings.

We believe that it is unclear that it would be possible for 12 storey sections to be incorporated into buildings as long as they are no more than 20% of the total area of the block.

Although HNSW has done a series of useful consultations and bus trips to help residents understand planning concepts the uptake barely scratched the surface of local HNSW residents most of whom don't even know BEP2 exists.

TRAFFIC & PARKING

The SSG do not believe the Traffic Study is correct in its projection of only 1.5% increase in traffic when there will be approx a 30% increase in population. Although the theory is that 60% of journeys will be made by walking or public transport this is highly unlikely in reality as most private tenants will have vehicles whether they use them on a daily basis or not.

We are already hearing many complaints from adjacent suburbs such as Alexandria regarding parking issues and every new development in Redfern and Waterloo has problems in terms of parking on and off street. To imagine this will not become a huge issue in the near future is fanciful when we consider the impending impacts of other private residential developments such as the RSL site and the redevelopment of Rachel Foster Hospital.

PUBLIC TRANSPORT

With such emphasis on public transport as the main method of commuting for new residents we would note that there are already serious deficiencies with the local public transport infrastructure.

Residents are unable to get onto 343 buses along Elizabeth Street in peak hours, while train commuters face similar problems at Redfern station at these times. Redfern station, which is one of the busiest in NSW, is also totally inaccessible for people in wheelchairs, with walking frames, prams and shopping trolleys.

The impact from the development of Green Square and the importance of introducing light rail are not considered. In fact the report is mainly focussed on roads and makes blanket assumptions about the demographics of the area that do not reflect reality.

Although much of the area is in walking distance of the CBD or transport the fact that many of the residents have mobility issues is not considered.

ENVIRONMENTAL SUSTAINABILITY

The SSG are extremely disappointed in the lack of Environmentally Sustainable Design (ESD) commitments which need to be included to ensure that the developments will be sustainable into an energy deficient future.

The importance of forward planning and the enshrining of ESD values into all new developments especially ones of this size cannot be emphasised enough. If the ESD values are not enshrined into the initial planning the development will be left to the vagaries of individual developers whose only priority will be getting a profit from their investment.

The real profit in the future will be sustainable and innovative design that allows the buildings to function successfully in an energy scarce future. The use of advanced building materials, solar power, water capture, storage and reuse and technologies like trigeneration must be part of any overall vision of the area for the future.

These requirements need to be wired into the whole precinct development and should thus be part of BEP2. Any development of this size being built in the 21st Century must reflect the issues raised by climate change and the need for sustainability.

We do not believe that BASIX and NABORS meet these needs and higher standards must be used to create a truly green and sustainable development. We refer to the innovations used at the Lilyfield HNSW development which have achieved a high Green Star rating.

OPEN SPACE

The SSG have grave concerns about the amount of open space that will be left in the area with the doubling of the number of dwellings on the HNSW sites. The open space per person is already below (6.9 sq m pp) the amount for other areas in the LGA (average = 11.8 sq m pp) and it is hard to see how adding another 3,500 dwellings will sustain even this substandard amount of open space.

Like so much of the BEP2 the devil is in the detail or in the lack of detail and the SSG believe that a maximum amount of open space should be zoned into the Plan, not left for the HNSW Master Plan or subsequent DAs.

High rise and high density living creates many pressures on the residents of such buildings and it is essential that a healthy amount of open space is available for residents relaxation and health.

We emphasise that this should be public open space and not private courtyards or balconies as is the case in many new residential developments.

Public open space enhances community interaction and if it is lost this will undermine the continuation or creation of local communities. We have grave concerns that open space will be lost as has happened with the new Walker/Morehead Sts development where planned community space in the centre of the development has been turned into private backyards.

PUBLIC DOMAIN

Public Domain concerns follow on from the problems with open space and refer to the creation of parks, community facilities, child care and health care centres and sustainable streetscapes.

The creation of the public domain has always been part of the work of Council and the fact that this area has been removed from Council control is very concerning, as is the fact that there are no specific proposals for public domain works in BEP2. To refer these important facilities to the HNSW Master Plan does not give the current and future residents any certainty about the appropriateness of what will be in the public domain, what it will look like and where it will be situated.

BUILDING PLACEMENT

BEP2 gives no real guide to where each of the different tenures will go. Infill development will obviously remove open space and change the look and feel of existing estates. The Waterloo Green for example already houses approx 800 dwellings and well over 1200 people but does have a large amount of open space which could be prioritised for infill development thus potentially cramping residents into an area which currently acts as the major open space for the surrounding area (both public and private).

We believe that there is a great danger of public housing buildings being concentrated in this area which would decrease the area of public housing dwellings across the precinct in line with the change in the nature of the tenures.

DEMOGRAPHICS

There is some concern about the nature of the projected demographics and the fact that there is very little statistical evidence of what the true make up of the housing estates are as only approx 23% of census forms are filled out by housing tenants.

The current view of the RWA and presumably HNSW is that the big demand in the future will be for units for older single people but although this is probably true in the near future over a 25 year period this could alter substantially with more couples and families needing public housing. There is already an influx of couples with children and single mothers whose needs will not be met by a predominant mix of studios and one bedroom apartments.

There is also no reference to the different demographics of the people and dwelling needs of those who will take up the private and affordable components of the development.

Finally there is little reference to universal housing, ageing in place, assisted living and group housing which should be incorporated into any diverse community planning.