



Submission

Planning Proposal: Waterloo Estate (South)

Counterpoint Community Services Inc

April 2022

About Counterpoint Community Services INC

Counterpoint Community Services Inc. provides a wide range of community support services in the Inner City and Southeast Sydney LGAs. We have operated in the heart of Waterloo since 1977, with a particular focus on working with social housing tenants and diverse communities.

We operate The Factory Community Centre in Waterloo, Counterpoint Multicultural Centre in Alexandria, Poet's Corner pre-school in Redfern, and act as the lead agency for many local grass-root groups and services, including the Redfern and Waterloo Social Housing Neighbourhood Advisory Boards.

Our Executive Officer, Michael Shreenan, also chairs the Redfern and Waterloo Groundswell collation consisting of local and peak body NGOs working together to resource residents through the Waterloo Estate redevelopment process. The chair of Inner Sydney Voice Regional NGO peak and co-chair of the Waterloo Neighbourhood Advisory Board resident lead Waterloo redevelopment group.

We have a community development team that is part-funded by the City of Sydney to support tenants through the redevelopment engagement process and numerous community groups. DCJ funds our community support team and hub staff to support a wide range individual residents and families. We support approximately 8,500 individuals annually.

All our funding or relationship with funders has had no bearing or influence on the content of this submission. We also remain apolitical despite continued engagement with local parliamentarians and other democratically elected representatives.

Executive Summary

Counterpoint Community Services thanks the Department of Planning and Environment for the opportunity to comment on the proposal to rezone the southern portion of the Waterloo social housing estate. One of our critical responsibilities as community service providers is to support residents impartially and ensure the diversity of voices and opinions in Waterloo and its surroundings are considered. This submission is informed by our work with the community, including social housing residents and local service providers and non-government organisations. We aim to express the diverse views of the local community, while also providing a local lens that we hope will inform the final determination of the proposal.

The proposal would see the majority social housing precinct (on public land) rezoned to allow redevelopment of the estate into a high-density 'mixed-tenure' precinct. Our comments are concerning the land owned by Land and Housing Corporation, currently 749 dwellings. The proposal will see the density increase to a minimum of 3,012 dwellings (1,938 market housing, 847 social homes and 227 affordable homes). Given the developer meets the design excellence threshold, we can expect the development to deliver an additional 10% floor space ratio and therefore increase the density to 3,300-3,400 dwellings.

The development proposal is driven by the Government's Communities Plus policy whereby public land of social housing estates is sold to developers to fund the replacement of existing social housing stock and in some instances, a modest increase in social housing dwellings. This reflects the self-funding model of Land and Housing Corporation where rental income, and asset sales pay for the new construction of public housing¹. Our submission will comment on the Communities Plus policy further, but we note that the planning proposal on exhibition is heavily weighted to the restriction of this policy and by extension, the views of planners, political and economic interests rather than the long-term public interest of current and future tenants.

¹ Plan finalisation report – PP_2020_SYDNE_004_00, Sydney Local Environmental Plan 2012 Amendment 75 - 600-660 Elizabeth Street, Redfern of February 2022, pages 13-14.

Given what we have heard from the community and our own consideration of the planning proposal, we make the following comments and recommendations.

1. Increase the amount of social and affordable housing

Given the poor maintenance of current stock, we welcome the provision of replacement social housing on the site. However, the planning proposal does not optimise the delivery of social and affordable housing at 26.5% and 7% of GFA. Considering the arguments provided in this submission, the government needs to invest directly in additional social and affordable housing and the planning proposal should prescribe much higher targets.

2. Conduct a Social Impact Assessment (SIA) NOW

A SIA would assess the accumulative social impacts of the planning proposal. The failure to provide a SIA makes it difficult for stakeholders to assess the impacts arising from the planning proposal, and therefore make an informed opinion. A SIA report should be undertaken by DPE before determining the outcome of the planning proposal. It is our view that without a Health Impact Assessment, a comprehensive mitigation response and a guaranteed well-resourced Human Services Plan for the lifetime of this project the proposal is in danger of failing its stated objectives and vision.

3. Reduce the proposed density

The proposed density of the site at 3,012 dwellings and the likely addition of 10% following design excellence is viewed by many to be an inappropriate level of density, especially in the broader context of other significant developments in the area including Green Square.

4. Improve solar and wind access

The lack of technical studies that address potential impacts arising from the planning proposal, including wind and solar, makes it difficult to provide an informed opinion on the updated planning proposal. However, limited analysis suggests solar access is far below the accepted standard and the potential wind impacts are concerning.

5. Reconsider the location of the community facility

The community centre should be relocated from the far corner of the estate and to the large park as requested by the community. This will enable the community centre to function as a hub for the entire community, and as a central location of engagement and social connection.

6. Reconsider the opening of Pitt Street to McEvoy Street

The opening of Pitt Street to McEvoy Street via a left-in and left-out intersection should be reconsidered given the strong community opposition and safety concerns given its proximity to Our Lady of Mount Carmel Primary School.

7. Ensure a Crime Prevention through Environmental Design (CPTED) study is undertaken

The planning proposal pays little attention to CPTED and at best, offers token references and makes no genuine effort to link specific crime and safety issues specifically to various components of the development at specific locations. A CPTED study should be undertaken to ensure safety is considered.

Further to our previous input into the above proposal(s), below is our detailed response for your consideration.

Local Context

The needlessly protracted process to date, based on the professional and political debate over the last decade, has resulted in shameful and needless stress and anxiety and caused significant negative social and health impacts on Waterloo residents. These impacts have not been addressed nor acknowledged by decision-makers. We hope that lessons are learned from this before any other community is subjected to similar treatment.

We highlight that Waterloo's strengths lie in its diversity; there is no overwhelming consensus or agreement of the community on the Waterloo redevelopment. There are a wide range of views, with some community members in support, some opposed and others who are undecided and seeking more information.

Despite this diversity, the opinion that the planning proposal should maximise social and affordable housing is unanimous. With over 1,000 applicants on the social housing waiting list in the Inner City and over 50,000 applicants across NSW², the government needs to maximise the opportunity to increase social housing in this development proposal. The benefits arising from the planning proposal, mainly the replacement of current social housing stock with a mere additional 98 social housing units and 227 affordable homes fall short of many of the community's expectations and opinions expressed during the government-documented consultations. The proposal fails to reach its stated objective of prioritising social housing and the direct investment as outlined in the NSW Housing Strategy³

Community concerns highlighted below are not new and stated from the commencement of the consultation that the current proposal or its predecessors have failed to address.

The Communities Plus Policy (CP)

We understand that the planning controls proposed are constrained by the cost-neutral policy context the proponents are working within. The Communities Plus policy prescribes a ratio of 70:30 for all social housing estate redevelopments (70% being market housing and 30% being social housing). The majority private ownership is perceived to be necessary to counter stigma and the supposed demotivating impacts of concentrated disadvantage, although the proponent may not spell this motivation out.

We emphasise that Counterpoint is not supportive of the economic or social arguments outlined in the Communities Plus policy. Disposing of valuable public land to secure investment to replace existing housing stock and, in some circumstances, marginally increase housing is economically short-sighted and is an unsustainable housing policy for current and future tenants.

² <https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times>

³ NSW Housing Strategy, Housing 2041, p.34.

The prescription of a ratio to all developments ignores the unique profile of each social housing estate that sits within its local context. Darcy and Rogers (2019)⁴ found that the preference to provide additional social housing stock in cheaper, less connected, and underserved locations in the outer city compared to new stock in inner-city locations such as Waterloo will prove more costly and less efficient. They argue that optimising stock in inner-city locations will enhance the utility of “existing services and infrastructure including health, transport and education facilities required by disadvantaged social housing tenants”.

Access to housing is a human right⁵, and the Government needs to fulfil its role in ensuring socio-economically disadvantaged groups have access to adequate housing. The Australian Housing and Urban Research Institute⁶ found that not only does investment in social housing support improvements in tenants health, safety, and sense of empowerment, but it also benefits governments by capturing savings in costs associated with health, justice and welfare services.

The government needs to value the benefits of directly investing in social housing and ensuring a viable future for social housing means establishing it as more than a sector of last resort for people. Social housing investment should rightly be seen as a key piece of social infrastructure that supports social inclusion, participation, place making and economic productivity. Hence, evaluating the financial feasibility of the planning proposal in terms of ‘cost neutrality’ (no cost to government)⁷ rather than the tangible social and broader societal benefits of directly investing in more social and affordable housing on the site is a considerable policy failure. On this measurement alone, the planning proposal fails to provide a commensurate public return for the sale of this valuable public asset.

We want to see a thriving social housing sector that can provide good quality affordable homes to a wide range of households and guarantees that everyone has

⁴ Dallas Riggers and Michael Darcy (2019). Finding the Right Mix in Public Housing Redevelopment: Review of Literature and Research Findings, page 4.

⁵ Article 11, International Covenant on Economic, Social and Cultural Rights (ICESCR).

⁶ Jim Davidson, Nicola Brackertz and Tom Alves (2021). Return on investment for social housing in the ACT. <https://www.ahuri.edu.au/sites/default/files/documents/2021-09/AHURI-Prof-Services-Return-on-investment-for-social-housing-in-the-ACT.pdf>

⁷ Independent Advisory Group Report, page 40.

the right to a home. Disposing of government assets that can be utilised for relatively small gain means today's perceived short-lived success will be tomorrow's deficit. The media has recently reported that since elected in 2011, the NSW government has sold off social housing to the value of \$3 billion dollars equating to 4,205 dwellings while only meeting 10% of its new social housing construction goals (2,393 dwellings)⁸. These measurements suggest that the CP policy has failed in its aims and should be dropped.

Counterpoint is also opposed to the unproven assumptions that seek to artificially engineer social mix in communities as per the Communities Plus policy. A mixed neighbourhood weighted to the high-end private market only hides and dilutes disadvantages and other systemic challenges rather than addresses the causes. We believe that the planning system needs to be strengthened and empowered to ensure that the people component of planning is viewed with equal vigour and 'enforcement' as the built environment controls.

Housing Mix

Irrespective of our view of the broader implications of the Communities Plus policy, we make the following comments in relation to the planning proposal of Waterloo South.

If the Government is going to artificial engineer housing mix, a properly balanced mix of one-third social housing, one-third affordable housing, and one-third private should be the aspiration. Despite the target of 70:30 private to public dwellings being the accepted standard of social mix, the origin of the formula is "related to project exigencies rather than research evidence"⁹. The representation of 70:30 by bureaucrats as the 'sweet spot' of social mix is not supported by evidence.

The 'hot' housing market has meant that rents and house prices are far outpacing wage growth, locking many out of homeownership and into the unaffordable private rental market. Statistics provided by the Australian government show that 47.8% of low-income households spent more than 30% of their income on housing costs in 2018,

⁸ <https://www.theguardian.com/australia-news/2022/apr/16/more-than-3bn-of-social-housing-sold-by-nsw-government-since-coalition-took-power>

⁹ Dallas Rigers and Michael Dacry (2019). Finding the Right Mix in Public Housing Redevelopment: Review of Literature and Research Findings, Page 3.

and therefore considered to be in rental stress¹⁰. Therefore, 7.5% affordable housing on public land is woefully inadequate to meet current and future housing needs. The planning proposal fails to assure genuinely affordable rents for essential workers such as those in aged care, community sector, childcare, nurses, teachers, and police. We are of the strong position that the planning proposal should seek a higher percentage of affordable housing. The Independent Advisory Group concluded that “10% affordable housing must be the target on this site”¹¹. We suggest the planning proposal can be more ambitious than the financially feasible 10% suggested by the Independent Advisory Group. As argued in the IAG report¹², the “demography, the clear need and the income circumstances of the population in this area” makes a strong case for affordable housing above 10%. The report noted however, that this cannot be achieved within LAHC’s feasibility constraints.

Internationally, the NSW planning system is a global laggard when it comes to ensuring the supply of affordable housing. Compared to the UK which guarantees 20-40% of all new developments to be affordable housing, the NSW planning system’s voluntary measures have only delivered 1,300 affordable housing dwellings between 2009 and 2017 (between 0.5% to 1% of Sydney’s housing supply)¹³. Given that Sydney is among the least affordable cities to rent in the world, the 7.5% affordable housing provision on public land is unacceptable and must be increased.

The community is clear on its expectation for 10% of the entire site to be dedicated to Aboriginal affordable housing and 5 % to others — an easily achievable and reasonable ask. The community have been misled by many on this issue, and the proposal fails to address this. The proposal has no specific Aboriginal housing guarantee apart from the possibility that 10 % of the 7.5% affordable housing may be dedicated to Aboriginal people, representing only 0.75% of the site. Despite the acknowledgement of the strong connection the Aboriginal community has to the area, the planning proposal fails to address how this connection will be represented in both the built form and social infrastructure.

¹⁰ <https://www.housingdata.gov.au/visualisation/housing-affordability/low-income-rental-households-in-rental-stress>

¹¹ Independent Advisory Group Report, page 4.

¹² Independent Advisory Group Report, page 55.

¹³ <https://theconversation.com/england-expects-40-of-new-housing-developments-will-be-affordable-why-cant-australia-94581>

The proposal also fails to provide any supported accommodation for homeless clients, transient communities, or aged and health supported accommodation units. The lack of care homes and housing for people living with disabilities to enable independent living is another example of the planning proposal not optimising the public asset for the public benefit.

The 28.2% social housing provided in the planning proposal is grossly inadequate and does not meet the Communities Plus target of 30%. As already discussed, the social housing waiting list is long, and some people are waiting for more than 10 years to receive a housing offer¹⁴. We note that since the redevelopment announcement, the community has felt strongly that the target should be 100% social housing for the estate. Our case managers support those sleeping rough and those who struggle to access secure housing. Miniscule increases to social housing will not address the pressing need for more social housing.

The amount of social housing is even less than 28.2% which is representative of front doors rather than gross floor area. The planning proposal designates 26.5% of gross floor area to social housing. This is highly problematic as one can draw the assumption that this will translate into lesser bedrooms and will therefore imperil the ability of larger families and those needing 2 or more bedrooms. Together, social and affordable housing represents only 33.5% of the gross floor area. That the remainder goes to the private market is not indicative that the proposal has given prioritisation to social housing, affordable housing, or a balanced provision.

We also highlight that the Redfern Waterloo Authority 'Contributions Plan' took financial contributions from previous developments from the area totalling \$24 million¹⁵. It was promised that these financial contributions would be invested in the local community to support the supply of affordable housing and social infrastructure. We ask that the NSW government uphold this promise and return the funds to Waterloo to contribute to this planning proposal and benefit the local community.

¹⁴ <https://communityhousing.org.au/our-impact/policy-priorities/#:~:text=More%20than%2050%2C000%20people%20are,%2C%20at%20worst%2C%20into%20homelessness.>

¹⁵ Independent Advisory Group Report, page 55.

The planning system has a vital role in addressing affordable housing needs within the broader economic environment that determines house prices and affordability. Not maximising the opportunity to do so on public land is wasteful and irresponsible. The proposal objectives state it will prioritise the delivery of social and affordable housing in conjunction with the provision of market housing. The planning proposal on exhibition fails this objective.

Proposal Objective: Enable the orderly Redevelopment of Waterloo Estate (South)

The community was promised a 'masterplan' that would cover the whole of the Waterloo estate and the metro quarter. The separation/decoupling into precincts makes it extremely challenging to give input or analyse the proposal's collective impact on the community. This represents a highly problematic poor planning practice to building sustainable and thriving communities.

The proposal is based on a vastly different alternative plan to the original one submitted by the proponent (LAHC). Although the original masterplan of 2019 included a density and building heights that the community opposed, it did more accurately reflect community views expressed through the Options Testing consultation. That we see yet a different plan that doesn't reflect many of the consultation outcomes arising from initial consultations has left the community feeling cynical and apathetic to the planning process. One resident recently commented that "the government does what they want to do. It doesn't matter what we say".

The technical studies executed with limited community input were mainly based on the entire estate redevelopment rather than just Waterloo South; therefore, it is difficult to assess if the latest proposal will enable the orderly redevelopment of the estate. The technical reports that inform the newest proposal are problematic, with many gaps and a lack of clarity such as the exclusion of an adequate solar access study.

From our perspective, the proposal fails to address how the recommendations from the technical studies will be executed and enforced. This is particularly so regarding the commitments related to social infrastructure, placemaking, community

development, and recognition and retention of our communities' connection to Aboriginal people.

The compartmentalisation of decision making may make it easy for planners and developers. However, the lack of micro-detail in the proposal is problematic. When raised with planners, the advice has been that these issues "will be addressed by the design guide at the DA stage". This makes it difficult for stakeholders to respond from any genuinely informed perspective and adds to the consultation fatigue and frustration expressed by residents. It also confers greater uncertainty to what the future of Waterloo may look like, and whether issues identified will ever be addressed.

Social infrastructure (facilities and Services)

A decent home and a vibrant community are essential components for a healthy and cohesive society. Secure housing is a step toward adequate access to health, education and employment and by extension contribute to achieving a sustainable environment and a thriving economy. However, we miss the mark before starting if the planning proposal fails to plan for the people and not just the property.

The planning proposal fails to provide a SIA and instead, relies on a Social Sustainability Report that not only fails to address likely social impacts arising from the redevelopment, but is narrow both in terms of its focus on social benefits and in terms of its treatment of selected topics. The Social Sustainability Report highlights several important issues from a baseline perspective but fails to deliver a deep dive into the rich history, assets, challenges, and complexity of the existing community and future social housing demographics. It also does not test if the current proposal would address these issues and lacks evidence-based decision making. The community facilities report also fails in this regard and is superficial at best as per the reason previously reported and ignored by both proponents and planners. Hence, the people component of this proposal has not been given the attention it should demand. A SIA would assess social impacts arising from the development, particularly the foreseeable social risks and social change and long-term distributive inequality impacts.

Further, the absence of a SIA means that it is difficult for any stakeholder to comment on the positive, negative, and accumulative impact of this project. Therefore, we don't know if there are sufficient measures in place to mitigate risks and maximize positive social outcomes arising from the buildings and their spatial context. We note that any intended commitments related to the soft element of social infrastructure are not enforceable either. Thus, the Waterloo South Gateway Determination Report does not appear to meet the Department's requirements for 'a high-level check' and 'a strategic merit assessment' of this planning proposal against 'potential environmental, social, economic and infrastructure impacts'¹⁶. The avoidance of a SIA suggests the planning proposal gives priority to developer financial feasibility considerations rather than the long-term social quality and value of the places where people live. Given the planning proposal proposes a major urban renewal that will displace the existing community and return a high-density development, the planning proposal should assess the social impacts (both positive and negative) before determining the outcome of the planning proposal.

Like housing, community facilities are more than just brick and mortar and failing to understand current strengths, needs and anticipate future needs in detail with all its shade of grey results in plans that will not be future proof or adequate.

The lack of a Health impact assessment and social impact study, despite being requested by the community from the commencement of this process, clearly indicates that the proposal, whilst may meet built environment demands, fails to plan for current and future Waterloo residents. We suspect this was not carried out, as a comprehensive study would shine a public light on the many failures and challenges of the current human service system that estate redevelopment alone won't address. Failure to do this has put any success the development may have in peril, which is ironic given the justification for the proposal when first announced.

Crime statistics provides insight into how the incidents of crime can affect the real or perceived safety of an area. Crime statistics are provided in the technical studies, but there is no analysis of crime data, and no implications or recommendations are

¹⁶ <https://www.planning.nsw.gov.au/Plans-for-your-area/Local-Planning-and-Zoning/Making-and-Amending-LEPs>

provided as it relates to the proposal. Yet, crime statistics have been used as a justification for the redevelopment by political leaders. It is a concern that no crime prevention design study has been undertaken with this proposal.

The impact of the process so far on tenants is widely known and accepted, it has been significantly detrimental, and no relocation or development has even commenced yet.

Whilst there is a much-welcomed human service plan currently being developed for the current needs of the Waterloo community, no plan or guaranteed resources are in place for the lifetime of this project; the promise of a concurrent well-resourced Human service plan for this process has failed to be materialised.

In addition, the lack of a developed governance framework for this proposal to ensure accountability, the delivery of commitments, and to ensure this project achieves its intended outcomes has also not been sufficiently scrutinized or addressed. For example, the social sustainability report makes clear the need for a government-community partnership approach to the development of the site, yet there is no commitment in place from any other agencies other than LAHC in relation to the recommendations within the SSR.

There is no assessment of current community engagement or governance.

Neither the social sustainability report nor the planning proposal addresses the suitability of the proposed building envelopes for the target residents. There is no mention of universal design principles as it relates to accessibility for disabled ageing residents. There is no plan in place to address the risk of conflict between exiting and a new mixed community. Furthermore, the equity impact of the proposal has not been assessed

There are no design standards that address existing well-known issues. For example, how measures such as soundproofing and double glazing could help reduce neighbour disputes, complaints, and social isolation.

There is no plan in place to address current issue of safe space/ wet space for 'street drinkers' which is an existing challenge for services, the drinkers, and current residents. This is before any new private market is added to the mix.

There is still no cohesive agreed employment strategy developed in the area, to maximise the benefits for current and future tenants.

Community Centre

Prioritising a purpose-built well-resourced neighbourhood/community centre at an early stage of the development of new housing estates and suburbs would help support the existing community whilst helping to develop a strong emerging community and avoid isolation and disengagement. The current proposal disappointedly indicates this will be done last despite historic undertakings.

Counterpoint, like many other providers, is currently operating out of a building that is not fit for purpose and is under-resourced to deal with current needs, let alone impacts and needs arising during and after the redevelopment.

Section 94 of the Environmental Planning and Assessment Act 1979 requires developers to contribute to public spaces by making available physical space or contributing to the local council to provide public amenities. There is no specific requirement for developers or councils to provide funding for local community-led organisations for community development activities or services. The plan fails to address how this need will be met sustainably.

The proposed location of the new centre, at the furthest corner of the estate surrounded by a residential enclave, is a failure to understand the function, value, and significance to the community. Community centres need to be located within easy walking distance for all residents both within the Waterloo south precinct and the Central and North precincts. Hence, the location in the planning proposal is not an appropriate or accessible location for a community hub. It denies previous feedback from the community, who argues for it to be within the central park at the heart of the estate and as a focal point for the new community. We understand the controls might allow the centre to be relocated elsewhere than the location currently exhibited.

However, would it not be better to address this now rather than leave it to the decision of fate. We note with disappointment that Counterpoint was not consulted about the community centre before an agreement between the COS and LAHC was reached. This is despite Counterpoint being the existing generic provider in the area.

The management of relocations and future housing stock has not been researched, nor has the community been consulted in any great depth. The assumption that all residents will be happy to be transferred to community housing rather than remain with HNSW is flawed thinking and is a policy that is being imposed rather than one the community has sought. We would argue that a mix of landlord options and choices is as important as the building mix.

Density, building locations and heights

The proposed density continues to be a significant concern that much of the community are not comfortable with. Considering the context of significant developments in the immediate area such as Green Square and the Botany Road corridor, the proposed density accounting for approximately 3,012 dwellings is far too high. It's also unclear what impact this will have on a social housing demographic with complex support needs and how this proposal plans to ensure the density will work well. Without a SIA, one can only guess.

Furthermore, the proposal and the studies do not test the impacts of density that is 10% bigger than suggested in the planning documents. Given the developer meets the design excellence threshold, we can expect the development to deliver an additional 10% floor space ratio and therefore increase the density to 3,300-3,400 dwellings. The Independent Advisory Group in advice to the Gateway determination said *"There is a general view by commentators on this proposed development that the density is too high... The IAG considers, however, that at this density, design quality, building quality, and urban amenity are of significant importance at development assessment stage and at the construction stage"*¹⁷. The IAG raised these concerns in relation to a planning proposal of 3060 dwellings and not the likely outcome of 3,300-3,400 dwellings. A SIA must be undertaken to assess the impacts of the density that will likely transpire given that the proposal does not test if the proposed

¹⁷ Independent Advisory Group Report (2021), page 47.

density is suitable for the priority allocations being made into Waterloo and the inner city where people often have complex and high needs.

There are a variety of different views as to the appropriateness of high-rises. Some community members are vehemently opposed to high-rises, others want to live on the highest floor. We note that LAHC's 2019 preferred masterplan had a considerable number of slimmer, taller towers, but fewer mid-rises (60% of buildings below seven floors) than in the planning proposal on exhibition. Counterpoint is more concerned about the density than built form, yet we suspect LAHC original proposal was more suitable to the target residents than the one currently exhibited. Yet again there no SIA to assess this.

We do note that the Independent Advisory Group found that the loss of revenue from the reduced number of taller towers is more significant than the savings in construction costs arising from building more mid-rises¹⁸. If taller towers would yield additional affordable housing than Counterpoint would provide conditional support.

Consideration suggested by the community for a purpose-built temporary accommodation unit was ignored. This is despite the fact it would result in a dramatic reduction of expenses currently being spent on private temporary accommodation, which is well known to be often substandard, inappropriate, and costly to the treasury.

We also feel that the proposal is unclear on the impact of bedroom volume in social swellings. There is a need to ensure a more balanced mix in terms of Bedrooms /occupancy rates within units. The current proposal might reflect the need for single units; however, we know the demand for larger family units fluctuates. We also know that planning for mixed communities needs to ensure the housing supply can enable this to happen and be future-ready. We need to encourage more families to return to Waterloo, and an increase in appropriate family size units would allow this to happen whilst also catering to the needs of the ageing population who will need carers.

¹⁸ Independent Advisory Group Report (2021), page 60.

There is concern that some buildings will become 'gated' precincts. Increasing segregation between the social housing residents and the private market was an issue the current community wanted to ensure didn't happen. How will the plan ensure a cohesive community as opposed to segregation and exclusion?

Parks and open spaces

It is disappointing to see that the planning proposal on exhibition has not considered Options Testing feedback particularly in relation to parks and open space. We make the following comments:

- Green space in the proposal is at least one hectare less than that proposed under the original community informed preferred plan.
- The community endorsed a green boulevard along George Street which is missing from the planning proposal.
- Community gardens have been dropped without any justification by LAHC, the City of Sydney or DPE.
- Social corners were another feature that was enthusiastically endorsed by the community throughout Options Testing consultations and is missing from this planning proposal.
- The central park was the original location for the community centre as desired and requested by both residents and current providers.
- We are pleased to see that emphasis has been placed on tree retention.

Trees, Wind and Sunlight

Increased tree canopy and retention of the existing canopy are welcomed. However, we would argue that if any existing trees are damaged during the construction, developers should be required to replace them.

Wind issue is a significant concern for residents and is currently a considerable problem on the site. Advice from City of Sydney urban planners suggests that wind cannot be solved through design excellence and that it is best to ensure wind impacts are solved at this stage. Furthermore, wind from tall buildings will be a problem, especially at the proposed tall building at Mt Carmel. The analysis also suggests that the large park will not be safe for standing or sitting.

We note that there is a lack of studies that investigate solar access because of the planning proposal. Limited analysis shows that due to the high density, streets will be dark, and less than 50% of all internal-facing dwellings in all blocks may comply with the minimum solar access requirements for apartment design of 2 hours in mid-winter. If social housing tenants are housed in buildings with poor solar access, this could have adverse health impacts, especially for those with poor mental health.

Street and traffic flow

The community opposes the opening Pitt Street to McEvoy Street to create a left-in, left-out intersection. We support their view. The proximity to the local school, the current use of Waterloo estate as a rat run, and the fact that over 40% of car accidents happen at intersections are why this opening should be removed from the proposal. If it were to proceed with a traffic light control system to mitigate the risk of said crashes, it would be too close to other controls and would cause further congestion on already highly congested McEvoy Street.

In relation to the technical study that investigates transport impacts, the only report appears to be the Waterloo South Planning Proposal - Transport Study generated by Jacobs Group Pty Ltd (20 March 2020). We are disappointed to see that there isn't a second expert opinion so we can make a more informed opinion about the proposal, especially given the issue of traffic flow and the opening of Pitt to McEvoy Street is a big issue for the community.

The current re-routing of public transport (buses) through the estate, for example, onto Raglan Street, has increased perceived danger to pedestrians and unwelcome traffic.

The planning proposal expects that based on Sydney LEP 2012 rates, the future redevelopment of Waterloo Estate (South) could result in approximately 1,685 residential and 114 commercial parking spaces. This would equate to roughly 0.5 parking spaces per dwelling with no determination as to how much of these would go to each housing type. These parking levels, in our view, are woefully inadequate, the increase in residential and commercial facilities will increase existing problematic parking issues in the area.

Retaining the current cycleway through the central park rather than Cope Street as originally proposed again ignores current challenges and residents' long-held concerns around this arrangement.

Safety

Both real and perceived crime in Waterloo have been long standing issues for years. It is disappointing to see that there is no separate technical report in relation to Crime Prevention through Environmental Design (CPTED). It is also surprising given that when the Waterloo redevelopment was announced in December 2015, then Housing Minister Braz Hazzard claimed that the redevelopment would have positive effect on crime, stating that where public housing had been redeveloped elsewhere crime rates and anti-social behaviour had fallen¹⁹. Hence, it is astounding that a SIA and a CPTED have not been developed for this proposal.

How can one have an informed opinion about the 'laneways' if there is no study in relation to their safety? From conversations with residents, the community like the convenience of laneways that cut through blocks to make it easier to navigate the estate but are concerned about the safety of the laneways and the lack of any crime mitigation strategies.

Based on available documentation, the planning proposal pays little attention to CPTED and at best, offers token references and makes no genuine effort to link specific crime and safety issues specifically to various components of the development at specific locations. The lack of studies in relation to safety is another illustration of how this planning proposal fails to investigate and address real and important issues.

Environmental factors

Adverse weather conditions significantly impacts the Waterloo community and all strategies to minimise this should be pursued. It is unclear how the proposal will address the recommendation within the climate report. It is also very disappointing that NSW

¹⁹ <https://www.dailytelegraph.com.au/news/nsw/sydneys-notorious-mckell-tower-to-be-razed-for-new-waterloo-metro-station/news-story/443026ced767fee56425a2dbef458d38>

government has scrapped the Design and Place State Environmental Planning Policy (SEPP) which emphasised environmental standards and required all developments to mitigate and adapt to the risks of climate change. This is particularly alarming given that the Intergovernmental Panel on Climate Change (IPCC) warned in April 2022 that greenhouse gas emissions must peak by 2025 to give the world a chance of limiting future heating to 1.5C above pre-industrial levels. The SEPP must be restored.

Older people tend to be more sensitive to the health effects from climate impacts. People in poor health or with poor mobility and access – people with existing physical or mental health problems may have a lower capacity and therefore less resilience to adverse weather events and environmental impacts.

Social isolation – socially isolated people may not receive the help they need during flooding or extreme weather events as they lack the necessary support networks. The proposal does not outline how the above will be mitigated.

Community engagement performance

Community engagement during this exhibition has been challenging given the context of the historic start and stop of the process to date and COVID.

We welcome the effort and attempts made by the planning team to work with stakeholders and provide adequate information.

However, removing independent resources to the community and the failure of DPE to heed much of the well-informed advice on maximising engagement during this process was a significant missed opportunity to maximise community ownership and influence over this redevelopment.

The inconstancy and inaccessible, disjointed and, in places, scant technical studies that underpin this proposal meant the engagement had been less than optimal. Telling or selling people a proposal is vastly different from consulting them on it and is an art the department has yet to master. Both planning and community engagement are complex. Engagement deserves more consideration than was afforded during this process. We will write a separate evaluation of this and share it with the department for future reference.

A simple comparison to the community engagement report 'Options Testing Consultation Report Key Findings' (2019)²⁰ would show the considerable difference between what the community reasonable asked for and what they have ended up with under this proposal. We strongly advise the Department of Planning and Environment to adopt the Compact for Renewal²¹ as a strategy for how to best engage with tenants undergoing redevelopment, and encourage all agencies involved in social housing estate redevelopments to sign up to the Compact principles, including Land and Housing Corporation, the City of Sydney and the Department of Communities and Justice.

Despite our observations that the community engagement was far from optimal, and acknowledgement that some community advocates are seeking the planning proposal to be re-exhibited, it is the opinion of our Executive Officer that this would not be beneficial to the community due to confusion and already historical lengthy delays. However, we support the City of Sydney's request for an extension to enable more time for the community to respond to the planning proposal.

Once again, we thank the DPE engagement team for working with our own team during this exhibition period. We also thank all our residents and partners in the development of this response.

We appreciate your consideration of this submission and look forward to work with all stakeholders as the project evolves.

THANK YOU

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²⁰ Elton Consulting (2019). Options Testing Consultation Report Key Findings.

²¹ Shelter NSW, Tenants' Union of NSW & City Futures (June 2017) Compact for Renewal – What tenants want from renewal accessed from the Shelter NSW website