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## Submission on the Hills Showground EIS August 2021

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### About Shelter NSW

Shelter NSW is a non-profit organisation that conducts housing research and advocacy on behalf of households on ordinary incomes — those in low- and moderately-paid work, in casual or part-time employment, or getting by on government support payments. We were founded in 1975 as a member-based organisation that today represents a diverse network of other organisations and individuals who share our vision of a sustainable housing system that provides a secure home for all. To advance our vision, we engage our members, experts, and partners and advocate on housing reforms that aim to benefit our economy, our society, and our environment.

### Comments on the Hills Showground EIS

Having reviewed the Environmental Impact Statement for the Doran Drive Precinct at Hills Showground station (the EIS), we posit that this development provides inadequate public benefit due to the limited amount of affordable and social housing proposed. A failure to ensure a large enough supply of affordable rental and social housing may also undermine the goals of this development to provide a diverse and resilient community.

Sydney is experiencing a severe affordable housing crisis and a social housing deficit that spans across the entire city. This crisis is widely recognised by the NSW Government and is acknowledged in the state’s housing strategy, Housing 2041, which names ‘affordability’ as one of the four pillars of the NSW housing system, aiming to “provide housing that is affordable and secure”. It is for this reason we believe the EIS should consider the social impacts of unaffordable and insecure rental housing in this precinct.

We are concerned that the proposed development will only deliver 22 affordable housing units, which, at 5%, is the absolute minimum that is required to be delivered under state policy. This is particularly concerning given its location on government-owned land and raises questions about the commitment of the NSW Government and Landcom to deliver more affordable housing. The EIS states that this site is one of the only state-owned development projects in the Central City District. As such, there are few opportunities to deliver subsidised housing options in this region, and the Hills Showground precinct poses a significant opportunity.

We also highlight the social impact of displacing affordable housing residents once the 22 dwellings revert to market housing after 10 years, which we are beginning to witness as the National Affordability Rental Scheme comes to an end<sup>1</sup>. It is imperative that any new affordable housing remains affordable in order to deliver a meaningful and much-needed increase in the supply of

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<sup>1</sup> Pollard, E. (2021, April 28). Fears Australia’s housing crisis will worsen as affordable rental scheme winds down. ABC News. Retrieved from <https://www.abc.net.au/news/2021-04-28/homeless-rise-nras-affordable-rental-scheme-ends/100097588>



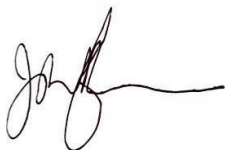
genuine affordable rental dwellings that will contribute to addressing the critical undersupply of affordable rental housing in NSW.

Additionally, we believe social housing should be delivered as part of this project. Whether it be loss of income or a dramatic change in personal circumstances, all communities need a stock of social housing; it is essential, for example, for people to leave domestic violence situations, seniors in the rental market, and those who may have lost income due to COVID-19. According to the Department of Communities and Justice, there are 1833 households waiting for social housing in the GW01 Parramatta/Baulkum Hills zone, which includes Castle Hill. Of these, 94 are considered priority i.e. in urgent need of housing. The minimum wait on social housing is 5-10 years for a studio/one bedroom unit, and 10+ years for all other dwelling types.

It is in the public interest to delivery affordable and social housing to every community in Sydney. The development must therefore deliver more to be in the public interest and to create a truly diverse and socially resilient community. As such, we propose that the Doran Drive Plaza Precinct development, and any development on government-owned land, should deliver a minimum of 20-25% affordable housing and 10% social housing to deliver meaningful social impact and public benefit. The use of government owned land to increase affordable and social housing is a well-established strategy aimed at addressing housing issues<sup>2</sup>. This strategy is able to reduce the cost of developing subsidised housing, addresses spatial dislocation of low-income households and has the potential to assist governments in meeting targets by significantly scaling up supply<sup>3</sup>.

Shelter NSW appreciates the opportunity to comment on Hills Showground EIS. We hope that the comments and insights we have provided bring some value. If you wish to discuss our submission in more detail, please contact our CEO, John Engeler, on 02 9267 5733 or by email at [john@shelternsw.org.au](mailto:john@shelternsw.org.au), or Stefanie Matosevic on 0431 037 724 or by email at [stefanie@shelternsw.org.au](mailto:stefanie@shelternsw.org.au).

Sincerely Yours,



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Stefanie Matosevic  
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<sup>2</sup> Spotts, M.A., Hale-Case, G. and Abu-Khalaf, A. (2017). Public Benefit from Publicly Owned Parcels: Effective Practices in Affordable Housing Development. Enterprise Community Partners, Maryland, USA. Retrieved from <https://www.enterprisecommunity.org/download?fid=3257&nid=3739>

<sup>3</sup> Palm, M., Raynor, K. and Whitzman, C. (2018). Project 30,000: producing social and affordable housing on government land. University of Melbourne, Melbourne. Retrieved from <https://apo.org.au/node/251431>

