

May 2022

SUBMISSION

Bays West Stage 1 Draft Master Plan and Urban Design Framework (White Bay Power Station & Metro) and Robert Street Sub Precincts

About Shelter NSW

Shelter NSW (Shelter) has operated since 1975 as the NSW State peak housing policy and advocacy body.

Shelter is concerned about the current housing crisis in NSW - the rising homelessness, increased rental stress, limited access to affordable housing options, impacts of poor-quality housing, and the growing disconnect between low-income households and viable employment opportunities.

What we see across our urban redevelopment areas is that low-cost properties are being steadily replaced with new ones at higher rents. This situation has seen lower income households being consistently displaced - forced to move away from their traditional economic, social and cultural connections into areas with higher levels of social and economic disadvantage.

We advocate for solutions that make the housing system fairer for all. Our vision is to support the creation of a sustainable housing system that can deliver a secure and affordable home for all NSW residents.

About our submission

Shelter appreciates the opportunity to comment on the Bays West Stage 1 draft Master Plan (May 2022) which builds on the vision of the Bays West Place Strategy in 2021. We have reviewed the Bays West Stage 1 draft Master Plan May from the perspective of lower-paid workers who may be employed on the site in the future and need access to secure affordable housing that suits their needs ¹.

Shelter's ongoing review of the planning system has presented evidence that the majority of these planning strategies fail to deliver solutions that address the supply of affordability housing in or around redevelopment precincts. This is especially true for those redevelopment precincts on

¹ Rent or mortgage payments are set at no more than 30% of household income before tax for the lowest 40% of income households.



Sydney's waterfront. These projects facilitate gentrification and result in the dislocation of lower-income workers. We take the position that for this redevelopment precinct to be a viable and sustainable community in the future, this Plan needs to adequately address the future housing supply needs of residents and the entire workforce, including cleaners, service industry, child and aged care workers and security services just to name a few. As such, Shelter NSW's comments and recommendations aim to readdress the failure of the strategy to support the housing supply needs of key workers. We noted this in our previous submission on this redevelopment, as well as the plan's failure to address the main vision of the 'Greater Sydney Regional Plan' – providing housing within thirty minutes' travel of employment sites.

The need for Affordable Housing in the Bays West Stage 1 draft Master Plan

Shelter does not accept the premise that housing supply alone will deliver affordable housing, as evidenced in recent research by Cameron Murray called 'The Australian Housing Supply Myth' 2019. Therefore, Shelter sees the redevelopment of Government-owned land as an important opportunity for the Government to deliver affordable housing options through joint venture arrangements with the NSW Land and Housing Corporation (LAHC) and community housing organisations. This would provide housing safety for lower-income key workers, older renters, first nations people and those with special needs.

The draft Bays West Stage 1 draft Master Plan gives effect to the Eastern City District Plan's (ECDP) strategic directions - supporting the delivery of infrastructure, liveability, productivity, and sustainability. However, it does not align with the ECDP requirement for a 10% Affordable Housing levy on all Government-owned sites.

The Bays West Stage 1 Master Plan also sits within the Inner West Council Local Government Area (LGA) which has a 15% affordable housing levy in its Affordable Housing Policy Background Paper and Position Paper: 'Best Practice in Value Capture March 2017'. The Plan also falls short by not including any affordable housing target.

Although 39.5% of first nations people own their homes, the other 60%+ rent. A high percentage of these rental properties are owned/managed by both public and community housing authorities due to discriminatory practices in the private rental market². While the draft Bays West Stage 1 Master Plan states that 'Connecting with Country' underpins the themes and directions of the Plan, it is not linked to any requirement for affordable housing and therefore lacks what we see as an important

² ABS Housing Statistics for Aboriginal and Torres Strait Islander Peoples. Collation of housing and household characteristics statistics from ABS collections. 2018-19 financial year.

safety net for first nations' people. It instead seems to indicate a tokenistic approach whereby the art and design themes of first nations people are emphasised, while their true need and primary safety net for a healthier life - access to secure affordable housing - is ignored.

The draft Bays West Stage 1 Master Plan also states that the direction in the Plan was drawn from previous stakeholder and community engagement. It indicates that this included providing greater clarity around affordable housing provision on the site. From our perspective however, no clarity has been provided.

The NSW Government Planning Authority³ also has an inconsistent approach regarding these large Government-owned master planned sites and affordable housing targets and Shelter has become increasingly aware of these contradictions. One example is the comparison of the Department's inclusion of an affordable housing target of up to 15% in the town centre and 10% in surrounding areas for the Frenchs Forest Place Strategy 2041 (December 2021), to the Bays West Stage 1 draft Master Plan which does not refer to any target. However, it includes clear targets for social infrastructure, heritage, open and play space. It also has clear targets for the gross floor areas (GFA) for residential, commercial, community and retail land use.

This approach by the Department seems to contradict its own messaging that developers require a consistent approach on land use matters. Furthermore, Shelter would argue that the broader community too require a consistent approach.

The lack of consistency here displayed will ensure that the key vision in the 'Greater Sydney Regional Plan' - for all residents in the Greater Sydney Metropolitan area to live within 30 minutes of a job, education, or health service – will not be realised. It seems that instead, with the exclusion of any affordable housing target, this vision is possible only for high-income households and that the current growing inequality across our cities will continue to increase.

Shelter would like to see the inclusion of a clear affordable housing target that is at least equivalent to those outlined in the ECDP and the Inner West Council Affordable Housing Policy Background Paper and Position Paper: 'Best Practice in Value Capture March 2017'.

Recommended Actions

Shelter recommends that a minimum 15% affordable housing levy be required on all residential, commercial and retail gross floor areas (GFA) within the Bays West Master Plan precinct.

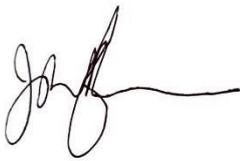
³ NSW Department of Planning, Industry and Environment. '

Thank you

Shelter NSW appreciates the opportunity to comment on the Bays West Stage 1 draft Master Plan. We hope that the comments and insights we have provided bring some value to considerations in the housing policy space. We are also happy to engage on the issues raised in our submission.

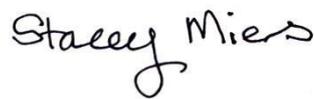
If you wish to discuss our submission in more detail, please contact **Stacey Miers** on **0410 633 272** or by email at **stacey@sheltersnsw.org.au**.

Sincerely Yours,



John Engeler

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