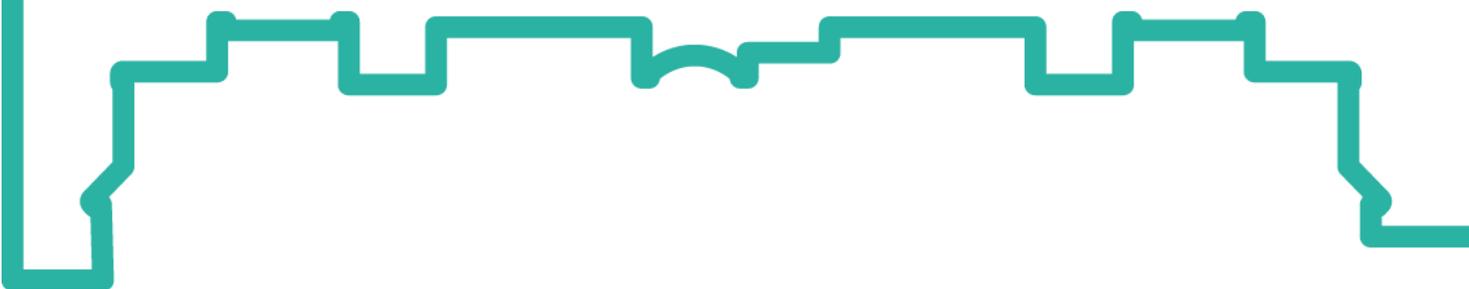




# Public Exhibition of the Riverwood Estate Masterplan and Rezoning Proposal

## SHELTER NSW SUBMISSION

25 September 2022



## About Shelter NSW

Shelter NSW has been operating since 1975 as the state's peak housing policy and advocacy body. Our vision is to create a sustainable housing system that provides secure homes for all.

We pursue our vision through critical engagement with policy and practice and thought leadership. We provide systemic advocacy and advice on policy and legislation for the whole NSW housing system to resolve housing inequality.

We are especially concerned for low-income households which struggle to afford good-quality and well-located housing in the private market.

Shelter NSW is concerned about the housing crisis in NSW and the rising trends in homelessness; housing rental stress as well as the impacts of poor-quality housing, particularly on low-income households. Lower-cost properties are being steadily replaced with new ones at higher rents, and new concentrations of disadvantage have been created across our major cities and towns as low-income households are displaced. We advocate solutions that aim to make the housing system work towards delivering a fairer housing system for all.

We have an established interest in the development of social and affordable housing, including policies and practice around public housing estate renewal and associated property development. Our submissions can be found on our [Shelter NSW website](#)

Shelter NSW welcomes the opportunity to make a submission regarding the proposal to redevelop the Riverwood Estate in Sydney's south west and thank the Department of Planning and Environment for the opportunity.

## Executive Summary

The NSW Government ('the Government') is proposing to redevelop the Riverwood Estate which currently consists of approximately 1,100 public housing dwellings. The proposal would see the loss of valuable public land and a denser future precinct of over 3,900 dwellings with just 30% social housing dwellings anticipated. **This proposal could see as few as 1,000 social housing dwellings delivered over a 15-20 year period, essentially only replacing current (larger-size dwellings) with smaller ones.** The proposal contains no explicit commitment to delivering Affordable Rental Housing but does note that if the latter was to be delivered it would be at the expense of social housing dwellings i.e part of the 30% social housing commitment.

**Shelter NSW welcomes the focus on creating more diverse housing stock** right across the housing market and often observes that the private housing market is an unreliable supplier of the 'right type of housing, in the right place, at the right time'. However, we note

with some concern that this **proposal pays little recognition of the large families already living in the estate and in the south-west generally – many suffering rental stress and overcrowding**. The proposal will see the precinct skewed towards smaller dwellings (studio/1/2 bedrooms). While Shelter NSW does not disagree that there is a need for more smaller dwellings for single households, especially for an aging population, we assert that the proposal will not be able to accommodate the needs of current large families already living in the estate (some in overcrowded conditions) as well as the needs of other large families on the social housing waiting list (now and in the future).

**At Shelter NSW, we also advocate for Affordable Rental Housing - in addition to social housing, not instead of it** (as proposed in this proposal). It responds to an important group that is often overlooked – financially stressed renters in the insecure, private residential housing market (renters who otherwise generally don't qualify for social housing). And it also caters for important key workers, including many from the government's own workforces who are best placed if they live and work in the same area. As the proposal notes, the Riverwood estate is well-located to key transport, employment and services – very suitable for the lower-income workers in the south-west.

**In 2016, the Canterbury-Bankstown Council identified that was required to deliver an additional 50,000 dwellings to accommodate over 100,000 extra people (28% growth) by 2036<sup>1 2</sup>**. It has assessed the need for emergency housing, social housing, low cost rental housing and affordable housing for key workers as high<sup>3</sup>. Waiting lists and waiting time for social housing are large and unabating. We conservatively estimate that as many as 10,000 people, including children across the LGA and nearby, are currently waiting as long as 10 years to access secure, affordable social housing (refer section 1).

The proposal to redevelop the Riverwood Estate is significant. There is lot at stake for the current and future public/social housing residents; private residents (owners and renters); local communities and their affiliated community and public sector service network; and the broader local government areas of Canterbury-Bankstown (within which the estate sits) and Georges River.

That this proposal could see effectively no additional social housing dwellings delivered over two decades is its greatest flaw. Given this poor public policy outcome and the loss of a major public land asset we assess that the proposal fails to stack up. **On this basis Shelter NSW cannot support the proposal in its current form.**

**We believe there is a significant requirement that the proposal makes a substantial and far greater contribution to increasing the stock of social and affordable housing in the south west of Sydney** – commensurate with a large and growing unmet demand, planned population increases and the capacity of Government to drive a better outcome in the broader public interest.

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<sup>1</sup> Canterbury-Bankstown Council (2020) [Draft Canterbury Bankstown Housing Strategy](#) accessed 23/9/22

<sup>2</sup> Canterbury Bankstown: [population profile](#) accessed 23/9/22 from Council site

<sup>3</sup> Op. Cit. at p15

### **The Government requires its Land and Housing Corporation (LAHC) to be self-funding.**

This is noted throughout the Riverwood Estate documentation. This has given rise to the public/private partnership 'Communities Plus'<sup>4</sup> model where LAHC sells valuable public land and dwellings in order to fund the expansion and upgrade of existing and new social housing stock across the state. It is our strong view that this business model, driven by NSW Treasury in particular, within which financial feasibility analyses for sites like Riverwood are shoehorned, is holding the state back. It puts a cap on the ambition for these types of public housing renewal sites. Shelter NSW has recently released new research, calling on the NSW Government to rethink its traditional approach to public housing estate renewal. In this submission we will refer to that research and call on the NSW Government to take a more innovative and long-term commercial public housing estate renewal approach in order to preserve valuable public land assets, while delivering more social housing.<sup>5</sup>

**If it is to be privatised, this site needs to work harder for the people of NSW.** And if the density of the site is to be substantially increased, care must be taken to create a place where large numbers of vulnerable people and lower-income households in general can reasonably live and be supported. Having focused on the relatively low proportion of social housing in the future Riverwood Estate, it is critical to understand that there will still be over 1,000 social housing households living in what will be a much denser, high-rise precinct. There will also be many low-income households privately renting in the estate.

The NSW Government acknowledges that's its tenancy populations are increasingly vulnerable, requiring significant support. While Shelter NSW does not assert that high-rise living is, by definition, unsuitable for lower income people, it is well understood that the downsides of this type of living are most keenly felt by that cohort. This is especially acute for those experiencing the compounding challenges associated with poor mental or physical health; loneliness and isolation. It is our firm view that if the NSW Government proceeds with this development it needs to actively assess and commit the necessary funds that will be required to support the: successful relocation and return of current public housing tenants (including large families); the rapid influx of many thousands of new residents (social, private owners and renters) and the growth of a vibrant, supportive community, building on the cultural, social and community heritage of the suburb of Riverwood.

**The proposed development is on NSW public land, home to hundreds of public housing tenants and a long-standing diverse, multicultural community. As such, we believe the NSW Government has the responsibility and opportunity to build an exemplar community** – one where people from all walks of life, cultures, ages, family size and incomes can prosper; supported by a network of social, government and public services and facilities; living in well-built and designed homes, buildings and public spaces. This vision we contend, is worthy of direct Government investment, innovative thinking and whole-of-government planning rather than the narrow zero-sum game of 'financial feasibility'.

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<sup>4</sup> The NSW Government has ceased using this branding but the 70:30 ratio lives on.

<sup>5</sup> Murray, C. & Phibbs, P. (2021) *Reimagining the economics of public housing estate at Waterloo – a report for Shelter NSW* [access via shelternsw](#)

In this submission Shelter NSW is calling on the NSW Government to:

- **increase its commitment for social and affordable housing in the renewed Riverwood to: 50% social housing, at least 10% affordable rental housing and 40% private housing** commensurate with the current and growing demand for social housing and to support key/essential workers to live in the new estate
- **acknowledge the complex needs of many of the existing (and future) large families on the Riverwood estate.** Proposed dwelling size needs to be carefully considered. The needs of current large families, some in overcrowded conditions, will require additional support during future rehousing of these families. We recommend the master plan and future housing mix of Riverwood area includes some larger social housing dwellings (3 and 4+ bedrooms) designed to suit large families, including multi-generational families.
- **commit to demonstrating a superior environmental performance in the redeveloped estate (not just in construction but over time)** beyond minimum compliance prescribed by BASIX, to support the health and well-being of lower-income residents, reduce energy bills and generally increase the long-term resilience of the community and precinct
- **apply a more innovative commercial, funding and tendering model to the development of this site reducing the need to sell a large tract of valuable public land to private developers and enabling the involvement of the community housing sector**
- **formally adopt the *Compact for Renewal*<sup>6</sup>** as a means of ensuring best practice tenant engagement in the relocation and resettlement process.

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<sup>6</sup> Shelter NSW, Tenant's Union of NSW & City Futures Research Centre (2017) – What tenants want from renewal accessed from [A-compact-for-renewal-what-tenants-want-from-renewal](#)

## Scope and approach of our submission

- **Our submission is for the attention of the NSW Government (not just the Department of Planning and Environment).** While we understand that the proposal is being made by the NSW Land and Housing Corporation (LAHC) and being assessed by the Department of Planning and Environment, we will in the main, address our recommendations to the NSW Government – landlord of the current tenants; asset owner of the current public land and housing and provider/funder of many public and community services required to support such a large new development and community.
- **Given the focus of Shelter NSW, this submission will primarily focus on the social and affordable housing provisions described in the proposals.** We note however, that other community and resident organisations as well as many local residents will provide valuable insight into factors such as public space, amenity and overall design. We encourage the consent authority to take heed of their feedback – as they represent a genuine source of information from a long-established diverse community. As residents they stand to be most-impacted by the proposed development. And of course, public housing residents, with a ‘right of return’ to the estate have keen interest in its development.
- **Ongoing Shelter NSW interest in the local government area of Canterbury-Bankstown.** The forecasted population of this hugely diverse local government is 372,322<sup>7</sup> with a housing target of an additional 58,000 dwellings by 2036 (assigned in 2016)<sup>8</sup>. The LGA is very large, diverse and with a recognised housing challenge. As Council notes,<sup>9</sup> *housing stress is negatively affecting households in the LGA and the private market and social housing pipeline is unlikely to meet the current and future need for affordable rental housing without intervention.*
- **Shelter NSW interest in severe overcrowding – evident in this estate and LGA** Shelter NSW is currently undertaking research into the phenomena of severe overcrowding, especially within multicultural communities and has commissioned research by a social planning and social research consultancy firm Judith Stubbs & Associates (JSA) (Judith Stubbs BSW PhD MPIA and Colleen Lux BA MSc (Environmental Studies). The Canterbury-Bankstown LGA is the focus of its study – chosen for its size and cultural diversity; and prevalence of overcrowding/severe overcrowding and the extent to which population and dwelling growth is planned for the LGA. JSA has made an independent submission regarding this proposal. We commend it to the Department and will refer to it in this document.

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<sup>7</sup> Canterbury-Bankstown Council – [population-estimate](#)

<sup>8</sup> Op.Cit - [CBCity Housing Target](#)

<sup>9</sup> Canterbury-Bankstown Council (2020) Affordable Housing Strategy (AHS) accesses [CBCity Council website](#)

## 1. The stock of diverse Social Housing needs to grow in Sydney's south-west

– **Current demand for social housing not being met.** According to the NSW Government's own social housing waitlist data <sup>10</sup> there was on June 30, 2021 over 4,852 households in just four local housing allocation zones close to Riverwood, approved and waiting for social housing. Given that each application represents a household we can conservatively estimate that as many as 10,000 people are waiting as long as 10 years to access secure, affordable social housing.

<b>Allocation Area</b>	<b>General (households)</b>	<b>Priority (households)</b>	<b>Waiting times for all dwelling types (years)</b>
Riverwood	200	18	10+ (5-10 years for Studio/1bdr)
Bankstown	2,046	96	10+ (5-10 years for Studio/1bdr)
Canterbury	694	108	10+
St George	1,408	282	10+
<b>Total</b>	<b>4,348</b>	<b>504</b>	<b>4,852</b>

– **People seeking homelessness services being turned away in NSW.** As detailed in our Shelter NSW Pre Budget Submission<sup>11</sup>, close to 50% of the over 47,000 people seeking accommodation assistance from the Specialist Homelessness Sector (SHS) in NSW during 2020-21 were turned away<sup>12</sup>. This has steadily worsened since 2015-16 where 15,471 or 34.2% had the same experience. Over the last decade, each year, at least 45,000 people present at SHS services seeking help (with Aboriginal & Torres Strait Islander people consistently overrepresented at nearly a third of all SHS clients). Many of these SHS service operate in Sydney's south west and report the lack of medium-long-term social housing as a key barrier to resolving client needs.

– **Homelessness in the Canterbury Bankstown LGA:** according to the Canterbury Bankstown Council<sup>13</sup>, citing the ABS (2016) there were approximately 2,344 people experiencing homelessness in the LGA, representing 8% of the total number of people in Greater Sydney (28,995) who were experiencing homelessness in 2016. Council noted that

<sup>10</sup> Department of Communities and Justice [Expected waiting times | Family & Community Services \(nsw.gov.au\)](https://www.nsw.gov.au/expected-waiting-times-family-community-services) accessed 27 April 2022. Allocation zone CS01. Note each application represents a household.

<sup>11</sup> Shelter NSW (2022) *Prebudget Submission to NSW Department of Treasury* available at [www.sheltersnsw.org.au](http://www.sheltersnsw.org.au)

<sup>12</sup> Productivity Commission (2021) *Annual Report on Housing and Homelessness*

<sup>13</sup> Canterbury-Bankstown Council (2020) – [Draft Affordable Housing Strategy Background Report](#) accessed 23/9/22 at p26

most of those experiencing homelessness in Canterbury Bankstown are living in crowded or severely overcrowded conditions.

– **(NRAS) Commonwealth scheme ending.** The National Rental Assistance Scheme (NRAS)<sup>14</sup> is expiring across the country<sup>15</sup>: 906 have already expired in NSW with a further 5,639 properties due to expire by 2026.

## 1.1 Key and Essential Workers suffering acute housing stress across Sydney – including in Sydney’s south west

Recent research by Gilbert, Nasreen and Gurrán<sup>16</sup> has highlighted the extent to which key workers in Sydney are struggling to find appropriate and affordable housing. These include teachers, nurses, community support workers; ambulance and emergency officers; delivery personnel and cleaners. These are the very types of workers needed to support the large and growing residential populations and commercial operations that exist across the Sydney.

The report has found that 20% of key workers across Sydney experience housing stress. Concerningly, the report notes that difficulties accessing appropriate and affordable housing is extending well beyond households traditionally considered in need of welfare into moderate incomes brackets. They found that there are no LGAs in the Sydney metropolitan region with a median house price that is affordable to an early career registered nurse, and only a few LGAs having affordable unit prices.

In May 2020, Shelter NSW made comment on the City of Canterbury-Bankstown *Draft Affordable Housing Strategy (AHS)*<sup>17 18</sup>. In that submission we reflected on the Council’s compelling research, observing that:

*while historically, housing has been relatively affordable in the LGA compared to similar medium-ring areas in Greater Sydney, affordability has deteriorated starkly in the last decade. Supply of social and affordable housing has failed to keep up with demand, and high levels of general housing supply have not delivered affordability for lower income households. This is illustrated by the high levels of housing stress in the area: 18.6% for all households, higher for lower income earners and especially renters (with 39% of renters paying more than 30% of their income in rent).*

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<sup>14</sup> This is a Commonwealth & State program. Eligible NRAS applicants from low-moderate incomes attract a contribution for each approved home; rent is set at least 20% below the prevailing market rates

<sup>15</sup> Commonwealth Government (June 2021) [nras-quarterly-report-30-jun-2021.pdf \(dss.gov.au\)](https://www.dss.gov.au/nras-quarterly-report-30-jun-2021.pdf) at p3

<sup>16</sup> Gilbert, C., Nasreen, Z. and Gurrán, N. (2021) *Housing key workers: scoping challenges, aspirations, and policy responses for Australian cities*, AHURI Final Report No. 355, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/355>, doi:10.18408/ahuri7323901.

<sup>17</sup> Shelter NSW (2020) – Submission on the City of Canterbury Bankstown draft Affordable Housing Strategy accessed from Shelter NSW website [Shelter-NSW-Submission](#)

<sup>18</sup> Canterbury-Bankstown Council (2020) – finalised [Affordable Housing Strategy](#) quote from p3

We noted the following regarding the Canterbury Bankstown LGA <sup>19</sup> (and assume most of these signs of unaffordability have intensified since then):

- Households in the LGA who rent their home are the dominant tenure form
- Number of homeless people in the LGA (1,295)
- 18.6% of households are in housing stress (rent or housing payments), spending more than 30% of their income on rent. This figure is 39.1% for low income rental households.
- Housing is severely unaffordable for people in lower income areas. As an example, less than 1% of the two-bedroom units in the LGA rental market is affordable for a very low-income household
- Redevelopment and gentrification threaten the loss of even the limited affordable options currently available to very low and low-income households
- Significant numbers of people (about 25%) work in 'key workers' industries, including with the LGA itself and that many of them were lower-income people. The demand for affordable key worker housing is significant
- Social housing is in undersupply with a high number of people on the waiting list, facing significant waiting times between 5-10 years to over ten years depending on the type of dwelling.

Council formally acknowledged in its AHS that 'housing stress is negatively affecting households in the LGA and the private market and social housing pipeline is unlikely to meet the current and future need for affordable rental housing without intervention.

## Recommendations:

- **That the NSW Government increase its commitment for social and affordable housing in the renewed Riverwood estate to: 50% social housing, at least 10% affordable rental housing and 40% private housing** commensurate with the current and growing demand for social housing and to support key/essential workers to live in the new estate

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<sup>19</sup> Sourced from the Canterbury Bankstown Affordable Housing Strategy

## 1.2 Housing stock (current and planned) is not meeting the needs of large families in Riverwood

Shelter NSW is currently undertaking research into the phenomena of severe overcrowding, especially within multicultural communities and has commissioned research by a social planning and social research consultancy firm Judith Stubbs & Associates (JSA) (Judith Stubbs BSW PhD MPIA and Colleen Lux BA MSc (Environmental Studies)). The Canterbury-Bankstown LGA is the focus of its study – chosen for its size and cultural diversity; and prevalence of overcrowding/severe overcrowding and the extent to which population and dwelling growth is planned for the LGA. Research has included in-depth qualitative research with families currently living in overcrowded dwellings across the LGA and within the Riverwood public housing estate.

Findings of this research point to the serious short-comings/failures of the Riverwood planning proposal and master plan currently on exhibition, particularly that:

- *The proposal does not acknowledge, or consider the needs of, the significant number of existing large families residing on the Riverwood social housing estate.*
- *The proposal does not provide any larger dwellings (4+ bedrooms) private or social, and a very limited supply of three-bedroom social housing dwellings. This lack of larger dwellings fails to meet existing and future social and affordable housing needs including:*
  - *the expressed housing need of existing large families living in the Riverwood estate, or other large families on the social housing waiting list,*
  - *the unexpressed housing need of large families currently living with overcrowding in private rental in the wider community of southwest Sydney and Canterbury Bankstown LGA, and*
  - *future social and affordable housing need of large households in southwest Sydney and Canterbury-Bankstown LGA, including (but not limited to) future migrants/refugee/humanitarian entrants to Australia.*
- *Due to the lack of larger dwellings, the proposal will result in adverse social impacts for existing large families who will most likely be re-housed out of the local area away from strong service, social and community supports that they have built over many years and rely upon for their individual and family's health and wellbeing*

## Recommendations

Shelter NSW, on the professional advice of JSA, recommends that:

- The complex needs of many of the existing large families on the Riverwood estate be acknowledged and carefully considered in future planning and re-housing throughout the redevelopment process to ensure that the service, social and community supports that have been established are able to be maintained.

- The master plan and future housing mix of Riverwood SSP area include some larger social housing dwellings (4+ bedrooms) designed to suit large families, including multi-generational families.
- Some larger family dwellings are provided in early redevelopment stages to enable existing large families, particularly those currently living with overcrowding, to be re-housed as soon as possible in the redeveloped Riverwood SSP area should they choose to.

## 2. Supporting a diverse, future Riverwood Community with many lower-income renters (in the private rental market)

According to AHURI research by Easthope et al<sup>20</sup>, 10% of the Australian population lives in an apartment (and increasing), mainly in capital cities (85%). Our interest at Shelter NSW is with the 39% of households living in high-density apartments from lower income households.<sup>21</sup> And while we are not against high rise living *per se* we note the research finds that these lower-income households, *over-represented compared to other dwelling types* are *disproportionally affected by challenges associated with apartment living*. Importantly these researchers have noted that, *“it’s not just the buildings, high-density neighbourhoods make life worse for the poor”*<sup>22 23</sup>

The experiences of apartment living for lower-income apartment residents are influenced by factors such *infrastructure provision, urban design, building design and management, neighbourhood amenities and facilities, and ongoing place management and community engagement*. Tensions can arise from a variety of sources – whether it be noise, conflict over shared spaces like gardens and laundries or the management of safety and security issues. And of course, these tensions are in many cases landing on people already stressed by the pressures of poverty, insecure work and any number of personal or health circumstances.

Navigating these issues is difficult for most people, but lower income renters whether social, affordable or private, have less flexibility and capacity to simply move if the situation becomes untenable. This is especially the case in a tight rental market with limited options for low-income people (let alone those with families, disabilities, carer responsibilities or other complicating factors).

<sup>20</sup> Easthope, H., Crommelin, L., Troy, L., Davison, G., Nethercote, M., Foster, S., van den Nouwelant, R., Kleeman, A., Randolph, B., and Horne, R. (2020) *Improving outcomes for apartment residents and neighbourhoods*, AHURI Final Report 329, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/finalreports/329>, doi: 10.18408/ahuri-7120701

[Improving outcomes for apartment residents and neighbourhoods—Executive Summary \(ahuri.edu.au\)](#)

<sup>21</sup> Easthope, H., Troy, L. & Crommelin, L. (2017) AHURI research funded by Shelter NSW *Equitable Density: The place for lower-income and disadvantage households in a dense city* sourced from UNSW City Futures Research Centre:

<https://cityfutures.adu.unsw.edu.au/research/projects/equitable-density-place-lower-income-and-disadvantage-households-dense-city/>

<sup>22</sup> Easthope, H., Troy, L. & Crommelin, L. (2017) *It’s not just the buildings, high-density neighbourhoods make life worse for the poor* ([theconversation.com](http://theconversation.com)) article in The Conversation published 22 August, 2017 accessed 28/4/22

<sup>23</sup> Easthope, H., Troy, L. & Crommelin, L. (2017) *This is why apartment living is different for the poor* ([theconversation.com](http://theconversation.com)) article in The Conversation published 21 August, 2017 accessed 28/4/22

At Shelter NSW, our focus is on people from the bottom two quintiles of household income. We are concerned that the failure to provide enough social and affordable housing across this future large precinct of Riverwood will see a great many lower income renters exposed to the insecurity and unaffordability of the private rental market as illustrated in the 2022 *Anglicare Rental Affordability Snapshot*<sup>24</sup>.

Beyond issues of affordability, we are also concerned that this development, effectively outsourced to the private sector, will not directly address the needs and concerns of future lower-income renters. And not just as ribbons are cut but over time as the estate buildings and community ages and changes. As Easthope et al note <sup>25</sup> *underpinning the high-density development of Australian cities is a policy orthodoxy that privileges market-led housing delivery and a reduced government role in direct housing provision and management... policy interventions directed at lower-income apartment residents have been limited*. They also note the narrow focus of developers, often catering more for investors when designing new apartment buildings leading to limited variation in apartment designs and sizes available.

As noted by Easthope et al, successful high-density redevelopment needs to consider the impact on lower-income and vulnerable residents of factors at the building, neighbourhood and metropolitan scales. Given the risks of creating a future, denser precinct that makes *'life worse for the poor'* we encourage the Government to step in at this early stage and ensure the Riverwood development puts lower-income people front and centre. Failure to attend to *the needs of lower-income high-density residents risks undermining the prosperity and cohesion of Australian cities in future years*.<sup>26</sup>

If the NSW Government proceeds with this development it needs to formally and transparently justify that a precinct of this density and socio-economic makeup can support such a large, lower-income renting population (including vulnerable people in social housing). Furthermore, we call on the Government to actively assess and commit the necessary funds required to support the: successful relocation and potential return of current public housing tenants; the rapid influx of many thousands of new residents (social, private owners and renters) and the growth of a vibrant, supportive community, building on the cultural, social and community heritage of the suburb of Riverwood.

## Recommendations

- **Ensure lower-income residents (overwhelmingly renters) whether in social, affordable or private dwellings are a key focus of future precinct, building and dwelling design considerations** (taking account of the overlaying housing diversity and adaptability needs that arise from disability, cultural considerations, family size and the desire to age in place).

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<sup>24</sup> Accessed 28/4/22 <https://www.anglicare.asn.au/research-advocacy/rental-affordability/>

<sup>25</sup> Easthope et al (2020) op. cit. Executive Summary at p3

<sup>26</sup> Easthope et al (2017) article in The Conversation op. cit.

### 3. Environmental performance of the Waterloo buildings and homes

Across the general community there is a deepening realisation of the cost of living with rising temperatures and energy-inefficient homes and appliances; a challenge disproportionately felt by lower income households. These households have the least financial ability to adapt and respond<sup>27</sup> and spend a disproportionately large part of their disposable income on energy costs (6.4% versus 1.2%).<sup>28</sup> Beyond the financial impacts, these households are challenged to deal with the health and well-being impacts of rising temperatures and rising energy costs<sup>29</sup> Whether as private or social/affordable housing renters or low-income homeowners, these households often have little control over the energy efficiency of their homes and little financial capacity to upgrade old, inefficient appliances such as water and space heating/cooling systems.

The Riverwood Estate will be redeveloped over the next 15-20 years. We contend that the NSW Government ought to be a sustainability leader, especially given what is likely to be a large residential population which relies on well-built, designed and maintained buildings and dwellings in order to mitigate the impacts of climate change and rising energy costs. We contend that the proposal should require more than minimum compliance and consider applying a BASIX 'stretch bonus' to relevant residential development in order to ensure a superior environmental performance

#### Recommendations

- **Commit to demonstrating a superior environmental performance in the redeveloped estate** (beyond minimum compliance) to support the health and well-being of lower-income residents, reduce energy bills and generally increase the long-term resilience of the community. Include in the LEP and future design guide a requirement that all development in the Riverwood Estate demonstrate environmental performance beyond the minimum prescribed by BASIX

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<sup>27</sup> Deloitte (2021), *The economic impacts of the National Low-Income Energy Productivity Program*, report prepared for the Australian Council of Social Service [Link to report accessed 27 Jan 2022](#)

<sup>28</sup> Australian Energy Regulator 2019, *Affordability in retail energy market*, Commonwealth of Australia, Canberra.

<sup>29</sup> Grey, C.N.B. et al 2017, 'Cold homes, fuel poverty and energy efficiency improvements: A longitudinal focus group approach', *Indoor and Built Environment*, vol. 26, iss.7, pp.902-913. doi:[10.1177/1420326X17703450](https://doi.org/10.1177/1420326X17703450)

## 4. Need for a more innovative and commercial business model

Shelter NSW research has called on the NSW Government to rethink its traditional approach to supplying social housing across the state – an approach that we assert, is holding back its key agency LAHC and compromising the delivery of enough social housing to make a material difference to the housing crisis in NSW<sup>30</sup>. In our public commentary<sup>31</sup> we have observed that the *Communities Plus* model has become so entrenched (we believe) it has stymied creative thinking about how a project like the Riverwood Estate development could be delivered for the greater public good.

This research challenges the perceived requirement of Government to sell public land assets in order to fund more social housing. Rather, it asserts that retaining and leveraging public land could actually deliver more social housing in the long-term. It explores by way of illustration for Waterloo South (as a case study with direct application to the Riverwood Estate), an alternative *model whereby 50% of new dwellings are public housing, 25% are retained by LAHC as build-to-rent housing at market prices, and 25% are sold by LAHC to the private market ... using low-cost leverage to generate positive cashflow and maximises exposure to long-term capital gains for LAHC.*

In a similar sense, Professor Bill Randolph and Dr Laurence Troy<sup>32</sup> in their submission to the Waterloo South Independent Advisory Group (IAG) have asked why the adoption of a private sector model, *as the only mechanism through which either plan is enacted* has not been debated? They make a strong case for a Not-for-Profit renewal of Waterloo South as a clear and viable alternative to the public-private partnership development model pursued under the current *Communities Plus* scheme. Under their proposal, delivery of a substantial component of Affordable Housing by the Community Housing sector would open new possibilities for the commercial, financial and operational delivery of the project. Their proposal also has direct application to the Riverwood Estate.

This would, we suggest, also challenge the treatment of this project as a ‘super lot’ in the tendering process rather than as a series of smaller staged parcels (the former only really attractive and viable for very large private developers). Given the complexities of the site including the requirement to relocate hundreds of current tenants it seems that a staged development will be required anyway. Why not formalise this in order to reduce the project and development risk and create more possibilities for collaboration especially, with the Not-For-Profit community housing development sector?

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<sup>30</sup> Murray,C. & Pibbs,P. (2021) [https://shelternsw.org.au/news\\_items/reimagining-the-economics-of-public-housing-estate-renewal-and-the-role-of-government-new-research/](https://shelternsw.org.au/news_items/reimagining-the-economics-of-public-housing-estate-renewal-and-the-role-of-government-new-research/)

<sup>31</sup> Morton, R (March 5 2022) The Saturday Paper [Exclusive-leaked-documents-show-public-housing-plan-halved](#) (paywalled)

<sup>32</sup> Randolph,B. & Troy,L. (2021) [Appendix\\_A\\_Submission\\_to\\_the\\_Waterloo\\_South\\_Independent\\_Assessment\\_Panel.pdf](#)

Higher proportions of social and affordable housing at Riverwood Estate have been deemed to be financially unfeasible under the current business models adopted by the Government. Given the size and significance of the development and the opportunity to leverage this site (well-located to transport, education and services there is, we believe, a strong case for a more innovative funding and development model as well as an extra case for additional targeted Government funding. This would ensure the delivery of enough social and affordable housing on this site to make a real difference to the NSW social housing waiting list and to address the costly homelessness crisis the NSW Government is otherwise required to respond to.

## Recommendations

- **Apply a more innovative commercial and funding model to the development of this site** reducing the need for LAHC to sell a large tract of valuable public land to private developers, enabling a far greater proportion social and affordable housing on the site.
- **If necessary, apply additional targeted Government funds to ensure sufficient social and affordable housing is actually delivered** balanced against funding that is already required to support homelessness services and other costs that emerge due to a lack of social housing (within the areas of domestic violence response; health; police, justice and corrections).

## 5. Compact for Renewal – what tenants want from renewal

The eventual transfer processes connected with the Riverwood Estate project will be very disruptive to the lives of existing tenants. The JSA submission has provided compelling case studies of the extent to which large families, as an example, already living on the estate have established themselves and supported each other.

Notwithstanding that formal LAHC documentation reminds people that relocation is some time off, the disruption has already begun. They are already feeling the impact of being told that they will need to leave their current homes and community. Some are employed and wonder how this renewal will affect their employment. Many are highly engaged in the social and community networks of the suburb and their neighbourhood and wonder what will happen when they move. Many worry about how they will maintain practical access to trusted doctors and other support services they have come to rely on. Those with small children wonder where they will start and finish their schooling. Some are houseproud and wonder how their personal investment in their homes will be recognised and compensated.

With the benefit of having observed the progress and impact of a number of *Communities*

Plus renewal projects, Shelter NSW encourages the NSW Government to actively engage and support community members, but especially current residents in the design of their future homes and community. We have heard directly from public housing tenants who have or are already part of an estate renewal project in other parts of Greater Sydney. They have told us what works well, and what doesn't – for residents and the overall project.

We recommend that any tenant engagement would logically include residents from the Washington Park Estate who would be a great source of feedback.

Shelter NSW recognises that the level of engagement we are advocating for requires the partnership between the Departments of Planning, LAHC and the Department of Families, Communities and Justice (DCJ), the 'landlord' of any current and future social housing residents across the life of the project. We offer the [Compact for Renewal](#)<sup>33</sup> as a template for how the NSW Government might best engage with the Riverwood Estate community from this early stage right through to relocation and possible return. Additionally, we ask that the compact be formally considered.

## Conclusion

With five years already passed, and the scope of the proposal already scaled-down, we imagine the NSW Government is keen to make progress with this large proposal. But still, we call on the government to rethink its approach, unshackle LAHC and work on the basis that the Riverwood Estate proposal should be seeking to produce a much fairer and accessible community with much more substantial outcomes for more affordable, diverse and accessible homes. To do otherwise risks at best, sub optimising, and at worst, creating a stressed hi-rise community that will, in the long-run be difficult and expensive to support.

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<sup>33</sup> *Compact for Renewal – What Tenants Want from Renewal*. These are the principles for a proposed *Compact for Renewal* between agencies undertaking urban renewal and social housing tenants affected by renewal. The Compact is the result of consultations with social housing tenants under a project carried out by Shelter NSW, Tenants' Union of NSW and the City Futures Research Centre at UNSW

Submission to Riverwood Estate SSP  
(Rezoning Proposal & Master Plan):  
Failure to consider housing needs of large families &  
households living with overcrowding



**September 2022**

This report has been prepared for  
NSW Department of Planning and Environment

by

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# 1 Introduction

## 1.1 Judith Stubbs and Associates & Shelter NSW research into overcrowded living

Judith Stubbs and Associates (JSA) is a social planning and social research consultancy. We undertake research, planning and policy development for local, state and federal government clients; community and business clients. We are acknowledged experts in housing research, policy and strategy development. We have a particular focus on affordable and diverse housing for people earning low to moderate incomes, people with special needs and people with experience of homelessness.

JSA has recently been engaged by Shelter NSW to undertake research to better understand the characteristics, experiences and needs of people living in overcrowded housing in southwest Sydney, particularly in the Canterbury-Bankstown LGA.

This project has included quantitative and qualitative research methods including interviews with service providers and discussion groups with people living in crowded households. To date, all participants of these discussion groups have been migrants to Australia from countries including Indonesia, Lebanon, Palestine, Pakistan, Myanmar (Burma) and Sudan.

## 1.2 Research findings reveal failures of the Riverwood SSP planning proposal & master plan

Findings of this research have revealed current short-comings/failures of the Riverwood SSP planning proposal and master plan currently on exhibition, particularly that:

- The proposal does not acknowledge, or consider the needs of, the significant number of **existing large families** residing on the Riverwood social housing estate.
  - Whilst the project documentation notes that **10% of existing households on the estate are 'large families'**, the characteristics and circumstances of these families are not described or mentioned further in the documentation.
  - ABS 2016 Census shows that 29% (n=256) of households living in social rental dwellings on the Riverwood estate are families with children and other family types (such as sibling and other family members living together without children, excludes couple only households). Of these households, 28% have 5 or more people usually resident. Noting that detailed ABS 2021 Census data was not available at the time of writing this submission.
- The proposal does not provide any **larger dwellings (4+ bedrooms)**, whether private or social, and a very limited supply of three-bedroom social housing dwellings. This lack of

larger dwellings **fails to meet, or prepare for, existing and future social and affordable housing needs of large families** including:

- the expressed housing need of existing large families living in the Riverwood estate, or other large families on the social housing waiting list,
  - the unexpressed housing need of large families currently living with overcrowding in private rental in the wider community of southwest Sydney and the Canterbury-Bankstown LGA, and
  - the future social and affordable housing need of large households in southwest Sydney and Canterbury-Bankstown LGA, including (but not limited to) future migrants/refugee/humanitarian entrants to Australia.
- Due to the lack of larger dwellings, the proposal will result in **adverse social impacts for existing large families** who will most likely require re-housing out of the local area away from the well-established and strong services, social and community supports that they have built over many years and rely upon for their individual and family health and wellbeing.

The proposal, as exhibited, does not sufficiently contribute to meeting the existing or future housing needs of the existing Riverwood estate community or some of our most disadvantaged families in southwest Sydney and the Canterbury-Bankstown LGA currently living with overcrowding.

We feel that these failures are serious enough to warrant this submission.

We recommend that:

- The complex needs of many of the existing large families on the Riverwood estate be acknowledged and carefully considered in future planning and re-housing throughout the redevelopment process to ensure that the services, social and community supports that have been established are able to be maintained.
- The master plan and future housing mix of Riverwood SSP area include some larger social housing dwellings (4+ bedrooms) designed to suit large families, including multi-generational families.
- Some larger family dwellings (4+ bedrooms) are provided in the early redevelopment stages to enable existing large families, particularly those currently living with overcrowding, to be re-housed as soon as possible in the redeveloped Riverwood SSP area should they choose to.

## 2 Failure to consider needs of existing ‘large families’

The proposal does not acknowledge, or consider the needs of, the significant number of large families currently on the Riverwood social housing estate.

Whilst the project documentation notes that **10% of existing households on the estate are ‘large families’**, the characteristics and circumstances of these families are not described or mentioned further in the documentation.

We know that many of the existing ‘large families’ are living with overcrowding, mould and moisture issues in their walk-up units. Many have been waiting for a transfer to a larger, more suitable dwelling for years. They have reportedly been told by DCJ that there are no such dwellings available in the local area and that they will just have to wait until one, somewhere, becomes available.

Many of these large families are migrants who came to Australia on refugee and humanitarian visas. A key cohort of families came to Australia from Sudan. They have experienced significant hardship and trauma in their lives. Settling in Riverwood alongside other Sudanese families who speak their language, come from the same country and understand all that they have been through has supported their integration into an Australian way of life.

Their children are settled into, and supported by, local public schools.

Families rely on the support of neighbours, who are trusted friends they now consider as family, to assist with caring for children and other family members with disabilities.

Women are connected and close to trusted, local doctors who have an understanding of their unique physical and mental health needs.<sup>1</sup>

The Riverwood Community Centre<sup>2</sup> and the NSW Health Healthy Homes and Neighbourhoods (HHAN) Integrated Care Initiative<sup>3</sup> (which has been partially based at the Riverwood Community Centre) have close connections with, and provide comprehensive services and supports to, many families living in social housing in Riverwood Estate.

Riverwood Renewal FAQs notes that,

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<sup>1</sup> Fotheringham, P., Raymond, D., Khanlari, S., Jiang, W., Gleeson, S., Miller, E., & Eastwood, J. (2021). A qualitative study into the health and social care needs and barriers to service access for Sudanese women living in a socioeconomically disadvantaged area of Sydney, Australia. *International Journal of Integrated Care*, 20(S1), 5. DOI: <http://doi.org/10.5334/ijic.s4005>; Deslyn Raymond, Erin Miller, Dan Sprange, Robert Borg, Elaine Tennant, John Eastwood, Developing new pathways to Health and Social Care for vulnerable clients in targeted Primary Schools; Raymond D, Miller E, Davis A, Sprange D, Eastwood J. Development and enhancement of pathways created to Health and Social Care for clients in areas of family disadvantage in targeted Primary Schools in Sydney, Australia. *International Journal of Integrated Care*. 2021;20(S1):6.

<sup>2</sup> Riverwood Community Centre, <https://riverwoodcommunity.org.au/>

<sup>3</sup> <https://aci.health.nsw.gov.au/projects/social-determinants/initiatives/red-link>, accessed 23/09/2022.

**“Residents will be able to express their interest in returning to the Riverwood estate if they continue to meet the eligibility criteria.”<sup>4</sup>**

With no larger 4+ bedroom dwellings, and few three-bedroom social housing properties proposed, many existing ‘large households’ will be unlikely to meet future ‘eligibility criteria’ due to overcrowding and will be required to be re-housed elsewhere.

As many large families have been waiting for a transfer to a larger dwelling for years, it is highly unlikely that they will be able to remain in the local area.

Leaving the local area will have adverse social impacts on many of these families.

### 2.1.1 Proposal does not acknowledge existing large households

The Existing Community Profile presented in the Planning Report identifies the Study Area as the TZ2646, which includes the estate and Washington Park development area, with an estimated population of 1,700, living in 1,019 social housing dwellings and 60 privately owned dwellings. The Planning Report states that,

“Within the Study Area, 60% are single-person households, 10% are large households and 50% are aged 65 years or older.”<sup>5</sup>

This equates to around **100 to 110 existing ‘large households’** in the Study Area.

These large households are neither defined nor discussed further in the Planning Report.

The Demographics and Retail Analysis prepared by SGS Economics and Planning (2021) considers the current and future population and employment profile of the TZ2646<sup>6</sup>, Riverwood SA2 and benchmark areas by population, age groups and employment industry groups.

SGS states that the TZ2646 is reportedly the smallest geographical boundary at which the projected data is available.<sup>7</sup> The analysis provides no description or assessment of current or projected household composition or family types within the Study Area.

Elsewhere in the project documentation, the Equity-Focused Health Impact Assessment (HIA) prepared by Cred Consulting reports that,

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<sup>4</sup> NSW DPE, Riverwood Renewal: Frequently Asked Questions, July 2022.

<sup>5</sup> Architectus (2021) Planning Report, Pg 28.

<sup>6</sup> Transport for NSW, Travel Zone Projections 2019 (TZP19), Transport for NSW produces Travel Zone Projections (for population, dwellings, workforce and employment) as an input into the Strategic Travel Model (STM). The projections are also used for a range of other strategic and policy work across government and the private sector, <https://www.transport.nsw.gov.au/data-and-research/forecasts-and-projections/travel-zone-projections-2019-tzp19>, accessed 05/09/2022.

<sup>7</sup> SGS Economics and Planning (2021) Riverwood Estate State Significant Precinct Demographics & Retail, prepared for NSW LAHC, 18 October, Pg 28.

*“LAHC internal research has identified (September 2021) that the population is characterised by approximately: 60% are single-person households, 10% are large households, 50% are aged 65 years or older”.*<sup>8</sup>

There is no further mention of the 10% large households in the HIA.

However, the HIA does note the impacts associated with rehousing of current social housing tenants particularly that:

- **Some social housing tenants may experience psychological distress associated with any required rehousing and the wait to be rehoused; and**
- **Tenants who relocate may lose important social ties and supports (e.g. reduced social capital) which may lead to diminished wellbeing and feelings of isolation.**

The HIA reports that the likelihood of such impacts is ‘high’ and lists a proposed mitigation measure that,

*“LAHC advises that all social housing residents will have the option to return to the redeveloped Study Area if a suitable property is available. It is anticipated that some residents will be able to move directly from their old home to a newly built home within the Study Area.”*<sup>9</sup>

**If a suitable property is available.**

The HIA further identifies that,

*“There is demand for dwellings to support existing families living in the Study Area and to support the inclusion of families in the renewal, including those on the waiting list for social housing, and those families looking for affordable private housing in a convenient location.”*

The likelihood of this impact is also noted as ‘high’ with the proposed mitigation measure that,

*“Consideration should be given to providing a mix of social housing dwelling including accommodating family households.”*<sup>10</sup>

**In our view, the proposal as exhibited does not adequately consider or respond to the impacts and associated mitigations identified by the HIA.**

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<sup>8</sup> Cred Consulting (2022) Equity-Focused Health Impact Assessment – Riverwood Estate State Significant Precinct, prepared for NSW LAHC, June, Pg 22.

<sup>9</sup> Cred Consulting (2022) Equity-Focused Health Impact Assessment – Riverwood Estate State Significant Precinct, prepared for NSW LAHC, June, Pg 7.

<sup>10</sup> Cred Consulting (2022) Equity-Focused Health Impact Assessment – Riverwood Estate State Significant Precinct, prepared for NSW LAHC, June, Pg 9.

## 2.1.2 What do we know about large households living on the Riverwood estate?

### ABS 2016 Census (most recent data available)

While the Travel Zone Projections geographies used by SGS may be the smallest geography available for projected population data, ABS Census data is available at the Statistical Area 1 level that can tell us a great deal about the characteristics of the existing Riverwood estate population.

As at September 2022, detailed ABS data for the 2021 Census is not yet available. As such, 2016 Census data is the most recent available. From this data, the following characteristics about the Riverwood estate population<sup>11</sup> are important to note:

- 64% of residents of the Riverwood estate were born overseas, with most common countries of birth as at 2016 being China, Lebanon, Vietnam, Hong Kong, Indonesia, New Zealand, Greece and Sudan.
- 29% (n=256) of households living in social rental dwellings on the Riverwood estate are families with children and other family types (such as sibling and other family members living together without children, excludes couple only households).
- Of these family with children/other family households in social rental housing:
  - 62% are living in a 3BR dwelling, 33% are living in a 1 or 2BR dwelling and 3% are living in a 4BR dwelling.
  - 21% have 5 or more persons usually resident in the dwelling and 7% (n=19) have six or more persons usually resident (**28% of children/other family households in social rental housing on the Riverwood estate have 5 or more people usually resident**).
  - 20% need one or two extra bedrooms to be suitably housed as defined by the ABS.<sup>12</sup>

### Many 'large households' have complex needs and are living with overcrowding

As part of the research for Shelter NSW, JSA carried out an interview with Deslyn Raymond, Senior Social Worker with the NSW Health integrated care initiative, Healthy Homes and Neighbourhoods Program based at Riverwood.

Deslyn Raymond has over 30 years' experience of social work practice in different social settings predominantly working with women, children and families. Through the program, Deslyn works closely with many families in Riverwood and has undertaken further research with Sudanese

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<sup>11</sup> ABS (2016) Census of Population and Housing, data obtained through TableBuilder Pro for the Statistical Area 1's that comprise the Riverwood social housing estate including 1137308, 1137309, 1137310, 1137312, 1137314 and 1137313. See Appendix A for Map.

<sup>12</sup> ABS (2016) Housing Suitability (HOSD) is a measure of housing utilisation based on a comparison of the number of bedrooms in a dwelling with a series of household demographics, such as the number of usual residents, their relationship to each other, age and sex. The criteria are based on the Canadian National Occupancy Standard (CNOS). This variable can be used to identify if a dwelling is either under or over utilised.

women into the barriers and health and social needs for women who have experienced female genital mutilation, particularly how to make services better for them.<sup>13</sup>

Many of the families she works with are migrant families who have come to Australia on refugee and humanitarian visas. She has written many support letters for families in Riverwood to accompany their request to DCJ for transfer due to overcrowding. The following case study illustrates the complex needs of many such families, and the difference a larger and more suitable dwelling can make.

*One of my clients from a country in the Middle East has complex PTSD after years of family violence and abuse. She finally left her partner and was ostracised by the family for leaving. She and her three children were able to get a tiny two-bedroom unit in Riverwood.*

*The house she left from her marriage was large with four-bedrooms, but it was all for show as she was made to feel like a servant. It was not her 'home'. The small unit in Riverwood was a hovel in comparison. The ex-partner would say, 'You have brought my children to this horrible place. Look what you have done.' She was doubly shamed.*

*One of the children also has complex medical conditions. We were finally able to get the family a transfer to a larger social housing townhouse in Riverwood. It is one of the best outcomes that we have had. When that happened, she and the children got a huge psychological boost. Now we can work on addressing the other chronic health issues.*

The successful transfer for the family described above is rare. There are many other large families in Riverwood who continue to wait for a transfer whilst living with overcrowding.

JSA recently held a discussion group with a group of Sudanese women who are **living with overcrowding on the Riverwood estate**. The following case studies illustrate the challenge of living with overcrowding whilst waiting for a transfer, as well as the value of local supports and connections.

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<sup>13</sup> Fotheringham, P., Raymond, D., Khanlari, S., Jiang, W., Gleeson, S., Miller, E., & Eastwood, J. (2021). A qualitative study into the health and social care needs and barriers to service access for Sudanese women living in a socioeconomically disadvantaged area of Sydney, Australia. *International Journal of Integrated Care*, 20(S1), 5. DOI: <http://doi.org/10.5334/ijic.s4005>; Deslyn Raymond, Erin Miller, Dan Sprange, Robert Borg, Elaine Tennant, John Eastwood, Developing new pathways to Health and Social Care for vulnerable clients in targeted Primary Schools; Raymond D, Miller E, Davis A, Sprange D, Eastwood J. Development and enhancement of pathways created to Health and Social Care for clients in areas of family disadvantage in targeted Primary Schools in Sydney, Australia. *International Journal of Integrated Care*. 2021;20(S1):6.

### ***Family of six in a two-bedroom unit in Riverwood***

*Amal lives with her husband and four children (aged 3 to 12 years old) in a small two-bedroom unit on level four of a walk-up in Riverwood. 'With all the children and the shopping, walking up those stairs is a problem!' Her unit has no balcony and the lounge room is very small. Two of her children share one of the bedrooms with their parents, while the two other children share the second bedroom which is only large enough to fit a single bed. 'It is very hard. You can't do anything. The children want to play soccer but there is no space. There is just enough space for them to have a few toys to play with. I have old people living downstairs. I cannot have the children making too much noise for them.'*

*Amal laughs with the other ladies when they think back to the challenges and the seemingly absurd things that the families did to get by in their small units during the Covid lockdowns. 'You cannot imagine what it was like for our families! All the neighbour kids would normally play all together and they could not. My kids love to go with me to do the shopping, they could not. We did not have devices for our children to do their home schooling. The schools were very good. They care about the families. We had to collect paper work for all the children, and then work with each one of them. It was very hard.'*

*The future prospect of being re-housed away from the area and each other is not something she likes to think about, 'Our kids are all friends. We get together often with the kids. We don't want to lose this social and community support. It is so important to us.'*

### ***Family of six in a two-bedroom unit in Riverwood***

*Hiba lives with her husband and four children (aged 4 months to 12 years old) in a small two-bedroom unit on the second level of a walk-up in the Riverwood estate. She works as a support worker in aged and disability care. She is working fewer shifts these days because she has a new baby.*

*'My house is very bad, but they [DCJ] do not fix it. We have been waiting for four years for a transfer. They just tell us that you are going to move eventually, so you just have to wait. I am very tired of cleaning all the mould every day. Water comes in through the window in the bathroom. It is very hard to use the space we have as a family. The*

*living space is very small. The bedrooms are very small. There is no outdoor space where the kids can play. I don't know how much longer we can stay in this two-bedroom unit. If we are still in this situation by the time my baby is 5 years old, we may just have to go. I just can't imagine moving to another part of Sydney or moving outside of Sydney. If it was just me and not my kids, I would try. But my kids, they have friends here and are happy at school here. It is very hard for them to contemplate moving, and for me too actually. My work is here. My friends are here and my family is here. It would be very hard to go to another area, and have to find other friends there. Especially as I need someone to help me and my husband take care of the kids. Sometimes I need to be at work and cannot pick up the kids from school and my friends here take care of my kids. So, it is very hard to think about going to another area and to be looking again for friends. It takes time to get to know what kind of a friend someone will be, and to know if I can leave my kids with them or no. It would be very difficult.'*

*The ladies laugh as Hiba recalls a conversation she had with the local DCJ worker about her transfer application and being re-housed out of the area, away from each other, as part of the redevelopment.*

*'They [DCJ] say there is no availability in this area, you will have to leave the area to say Campbelltown or Blacktown. We say, 'If you transfer all of us together, then we will go.' They [DCJ] just laugh, because they know that is impossible even if they can sympathize with us. They [DCJ] have new areas a bit far from here, after Liverpool, after Blacktown, after Campbelltown, miles away. It is new and good, but we laugh when we say, 'We will go if you take all of us together. But otherwise, I cannot go by myself out there. I cannot imagine leaving them [my friends in Riverwood].'*

### 2.1.3 Proposal must consider the social impacts of relocation on existing large households

The health, social and community services and support networks that wrap around many individuals and families in Riverwood is critical to the health and wellbeing of many existing large families.

Deslyn Raymond describes how important maintaining existing connections to services and supports is for the families she works with through the Healthy Homes and Neighbourhoods Program.

*"The principals of the two local primary schools in Riverwood support the families fully with additional supports, engage private Allied Health services, provide practical help*

*with food and other preventive programs and with holistic care. Disconnection from this universal and trusted community site would be very detrimental for our large families who are established in this area and especially as they are not provided for in the redevelopment.*<sup>14</sup>

It is recommended that:

- The complex needs of many of the existing large families on the Riverwood estate be acknowledged and carefully considered in future planning and re-housing throughout the redevelopment process to ensure that the services, social and community supports that have been established, and relied up on by many individuals and families, are able to be maintained.

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<sup>14</sup> Interview and correspondence between JSA and Deslyn Raymond, Senior Social Worker, Healthy Homes and Neighbourhoods - Riverwood, NSW Health, May-September 2022.

## 3 Failure to provide larger dwellings

The proposal fails to provide any larger dwellings (4+ bedrooms), and a very limited supply of three-bedroom social housing dwellings, to address existing or future housing needs including:

- the expressed housing needs of the existing large families or other large families on the social housing waiting list,
- the unexpressed housing needs of large families currently living with overcrowding in the wider community of southwest Sydney and Canterbury Bankstown LGA,
- future social housing need of large households, including (but not limited to) migrant/refugee/humanitarian entrants to Australia.

### 3.1.1 What larger dwellings are proposed for Riverwood SSP

Proposal documentation reports that future dwelling mix will be flexible to meet market demand at the time of development and to provide social housing dwelling mix required to meet the housing needs of LAHC’s portfolio.

The Planning Report describes a range of dwelling mix scenarios that have been tested to respond to market housing demand and LAHC portfolio requirements, which result in recommended private dwelling mix that includes “a greater provision of 2-bed and 3-bed requirements when considered against LAHC requirements” and that final dwelling mix is subject to a range of factors.<sup>15</sup>

That said, there is indicative dwelling mix for the 3,926 future dwellings presented at Table 22, which looks at future travel mode share. This table shows that no four-bedroom dwellings, private or social, considered in the dwelling mix; and that there is very little provision of three-bedroom social housing dwellings (n=52, 5% of social housing dwellings).<sup>16</sup> If this mix of social housing dwellings presented eventuates, there would be very few existing large families that would be able to be re-housed in Riverwood. The following table is derived from the dwelling numbers presented in Table 22.

	Market		Social		Total dwelling
Studio	-	-	104	10%	104
1 bedroom	723	25%	415	40%	1138
2 bedroom	1,878	65%	466	45%	2344
3 bedroom	289	10%	52	5%	341
<b>Total dwellings</b>	<b>2,889</b>	<b>100%</b>	<b>1,037</b>	<b>100%</b>	<b>3,926</b>

Source: JSA 2022; Architectus 2022, Pg 112.

<sup>15</sup> Architectus, Riverwood Estate State Significant Precinct, Planning Report, 5.9 Dwelling Mix, Pg 82.

<sup>16</sup> Architectus, Riverwood Estate State Significant Precinct, Planning Report, Table 22, Pg 112.

### 3.1.2 Expressed need for larger social housing dwellings in the area

The Planning Report notes that future dwelling mix will respond to market demand and the housing needs of LAHC's portfolio. Detailed data on LAHC's dwelling portfolio, and the characteristics of households on the social housing waiting list, particularly at local/small geographic levels is not publicly available.

#### LAHC Local Area Analysis: Canterbury-Bankstown LGA

LAHC has prepared a Local Area Analysis for the Canterbury-Bankstown LGA that is available online.<sup>17</sup> Figure 7 (below) shows the types of social housing dwellings available in the LGA compared with the waiting list. The mismatch between the explanation above the figure regarding 'the greatest demand is for smaller dwellings for one or two people' and the figure itself, which **quite clearly shows expressed demand for 4-bedroom dwellings well exceeding supply of larger dwellings** (identified by JSA with orange circle), and a higher level of priority housing demand for four-bedroom dwellings compared to 0-1 bedroom dwellings in this area. The share of priority waitlist demand for four-bedroom dwellings is not much smaller than share of demand for two and three bedroom dwellings.

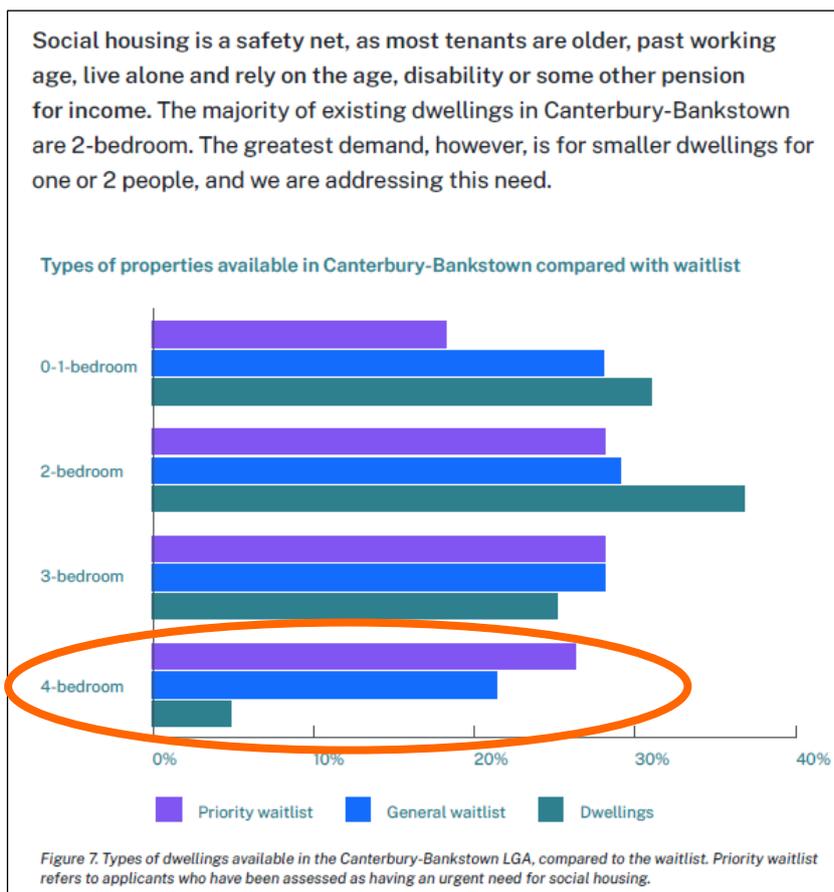


Figure 3.1: Type of NSW LAHC properties available in Canterbury-Bankstown LGA compared with waitlist

Source: NSW LAHC (2021), Pg 18.

<sup>17</sup> NSW LAHC (2021) Local Area Analysis

### DCJ Expected Waiting Times for social housing (as at 30 June 2021)

Expected waiting times for general social housing applicants by allocation zone is presented online by DCJ, with the most recent data available as at 30 June 2021. The following figures show that the expected waiting time for 4+ bedroom property in the Riverwood and Canterbury allocation zones is 10+ years.



Figure 3.2: Expected waiting times for social housing, Riverwood allocation zone

Source: <https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times>, accessed 15/09/2022



Figure 3.3: Expected waiting times for social housing, Canterbury allocation zone

Source: <https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times>, accessed 15/08/2022

Many of the participants interviewed for the overcrowding study are living in private rental. Some have not applied for social housing, either because they may not be eligible due to their residency status or because they do not feel that “social housing is for people worse off than me and my family.” Many others interviewed report that they have been waiting on the social housing waiting list for over 10 or 15 years, since first arriving in Australia. They do not believe that they will ever receive an offer for social housing. They also know from others who have received an offer, that it is likely to be for a dwelling very far from where they have created their new home in Australia, in the Canterbury-Bankstown LGA.

### 3.1.3 Unexpressed need for larger social/affordable dwellings in the area due to overcrowding in private rental housing

Severe overcrowding is a problem that has been growing over time in outer metropolitan areas of Australia, particularly in Sydney and Melbourne. The number of people living in severely overcrowded dwellings has increased in the last two census periods.

While there are different ways to define and characterise overcrowding, 'severe overcrowding' is a form of homelessness as defined by the ABS.<sup>18</sup> One of the NSW Premier's Priorities is to reduce homelessness, particularly to 'reduce street homelessness across NSW by 50% by 2025'.<sup>19</sup>

Groups more likely to experience severe overcrowding have been identified including recent migrants to Australia, Indigenous people and tertiary students. Economic drivers of severe overcrowding including poor housing affordability and tight housing markets have been explored and documented. Parts of southwest Sydney, like Canterbury-Bankstown LGA, are areas where the combination of low incomes, high rents and a limited supply of, and access to, suitably sized housing for large families/households further driving overcrowded living.<sup>20</sup>

Social and cultural drivers of overcrowding including migration, family growth, temporary mobility (especially in Indigenous contexts) and cultural considerations, norms and expectations; and particularly the nuances of these factors for different groups are less well-understood and documented in the Australian context, although recent research has been done.<sup>21</sup>

Adverse impacts of living in overcrowded situations are explored in international and Australian literature with particular concerns identified related to health and wellbeing, child development and education, household conflict and increased risk of forced mobility/homelessness. Such adverse impacts are exacerbated by the severity and persistence of the overcrowding. Positive impacts/benefits of living in overcrowded situations identified including pooling finances, reduced costs and resultant improved housing stability, sharing caring responsibilities and maintaining

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<sup>18</sup> ABS (2016) Estimating homelessness. "People living in crowded dwellings represent a continuum within the scope of those who are marginally housed. In the context of the elements developed for the ABS definition of homelessness, people living in 'severely' crowded dwellings are considered to be homeless because they do not have control of, or access to space for social relations. In 'severely' crowded dwellings inhabitants are generally unable to pursue social relations, or have personal (i.e. family or small group) living space, or maintain privacy, nor do different family / groups within the dwelling have exclusive access to kitchen facilities and a bathroom. In such circumstances, if people had accommodation alternatives it would be expected that they would have exercised them." <https://www.abs.gov.au/statistics/people/housing/census-population-and-housing-estimating-homelessness/latest-release#overcrowding>, accessed 16/09/2022.

<sup>19</sup> <https://www.nsw.gov.au/premiers-priorities/reducing-homelessness>, accessed 16/09/2022.

<sup>20</sup> Parkinson, S., Batterham, D., Reynolds, M. and Wood, G. (2019) *The Changing Geography of Homelessness: A Spatial Analysis from 2001 to 2016*, AHURI Final Report 313, Australian Housing and Urban Research Institute Limited, Melbourne. Brackertz, N., Davison, J., Borrowman, L. and Roggenbuck, C. (2019) *Overcrowding and severe overcrowding: an analysis of literature, data, policies and programs*, report prepared by AHURI Professional Services for NSW Department of Communities and Justice, Australian Housing and Urban Research Institute Limited, Melbourne.

<sup>21</sup> Dockery, A.M., Moskos, M., Isherwood, L. and Harris, M. (2022) *How many in a crowd? Assessing overcrowding measures in Australian housing*, AHURI Final Report No. 382, Australian Housing and Urban Research Institute Limited, Melbourne.

family/social/cultural/community connections are also less well-understood and documented in the Australian context.

The research JSA has been undertaking for Shelter NSW aims to make a contribution to our understanding of the experience of people living with overcrowding in the Australian context.

The quantitative findings of our research show that at the time of the 2016 Census, there were a total of 15,122 people living in severely crowded dwellings (needing four or more additional bedrooms to be suitably housed) in Greater Sydney. Canterbury SA3 had 6.5% of all people in Greater Sydney living in severely crowded dwellings, whilst Bankstown accommodated 5.2% of this group, and were ranked 6<sup>th</sup> and 7<sup>th</sup> of all SA3s in terms of the number of people living in severe overcrowding in Greater Sydney.<sup>22</sup>

Whilst an area like Canterbury-Bankstown is relatively lower cost in terms of rental compared with Greater Sydney, it is not affordable to low-income households. As at the ABS 2016 Census, a median priced two-bedroom unit was only affordable to the upper 35% of the low-income band in Canterbury-Bankstown LGA, and a three-bedroom house was only affordable to the upper 60% of moderate-income households. Housing stress was much higher than average in both Bankstown and Canterbury SA3s, likely due to the lower than average incomes in these areas as well as the higher than average concentration of very low and low income households. In Canterbury SA3, 54% of all renting households were in rental stress compared with 42% for Greater Sydney. Very-low-income households were the most likely to be in rental stress, with 33% in moderate stress and 55% in severe stress (88% in total). Low-income households also had a high rate of rental stress (66%), with 55% in moderate stress and 11% in severe stress. The lack of affordability in the private rental market as has been documented elsewhere is a key driver of overcrowding.

The qualitative findings of the research help to paint the picture of this culturally rich part of Sydney, with its strong social and cultural ties that bind people to the area. For many, it is their first point of settlement in Australia and a safe haven after years of war, trauma and displacement. People choose to stay in this area, despite their unmet housing needs, due to the proximity to employment and educational opportunities and public transport; these social and cultural ties and supports; as well as the schools, medical services, places of worship and other services where trusted professionals speak their language and have some understanding of their lives and complex needs.

Places like Lakemba and Riverwood mean so much to people. Many people do not drive and rely on walking or public transport to do their shopping, take their children to school, attend a medical appointment and regularly attend the mosque or other place of worship.

People report that they feel connected to, and they feel safe in, their community.

*“If my daughter is coming home late at night from University, I know that my neighbours will be out and people will be looking out for her. I do not have to worry about her. That is why we live here. I would not want to live somewhere*

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<sup>22</sup> Judith Stubbs and Associates (2021) DRAFT Understanding Severe Overcrowding in Southwest Sydney, Report 1: A Quantitative Analysis, April, Report prepared for Shelter NSW.

*else.” (Participant in discussion group for women living with overcrowding in Lakemba).*

They will put up with very poor housing to stay in their new community. Some would not choose to leave the area, even if there was something more affordable and suitable, as they perceive that the social costs to them and their family would be too great. *“We would not leave this area with a happy heart” (Participant in discussion group for women living with overcrowding in Lakemba).*

Many of the participants in the study have a story about a family who has moved from the area in search of more suitable housing, either because they finally received an offer of social housing or they choose to take up a more suitable private rental dwelling further out. A common theme among these stories, is that many of the families are reportedly struggling to settle into their new area due to the dislocation from community and cultural services and supports. The following is one such story.

***Large family of 9 receives social housing offer after 16 year wait, must leave local supports to accept***

*Elham and Abdel have seven children ranging in age from 14 to a new baby born in 2022. The couple came to Australia from Palestine in 2005 and settled in Lakemba. They applied for social housing when they first arrived. They waited sixteen years before an offer of social housing was made in 2021. The family was living in a cramped unit in Lakemba and accepted the offer to move to a four-bedroom, one bathroom home in Miller provided by the Department of Communities and Justice, as if they did not accept there would not be another offer.*

*Miller is 25km due west, or a 30-minute drive, from Lakemba. Miller is a long way from the bustle of Haldon Street in Lakemba with its Ramadan evening street food festival, Islamic bookstores, Lebanese sweetshops, Bengali and Afghan restaurants and importantly multiple support services for Muslim and/or Arabic speaking people and families, particularly for women like the Tripoli and Mena Association, Muslim Women Australia, Islamic Women’s Welfare Association and a few female GPs in the area that provide culturally appropriate care in community languages.*

*It has been difficult for the family to leave their community in Lakemba. They are all finding it hard to make friends and the older children are struggling to settling into their new school. Elham continues to make the 30-minute drive to Lakemba to attend the Women’s Group with one of the local services every Friday morning after she has seen the children off to school from 10am until 12pm. Around a dozen women meet each week to share their daily worries and triumphs with each other while creating small artworks organised by the unflappable community worker who facilitates the group and*

*at the same time provides practical support and problem-solving such as translation and assistance filling in forms for Centrelink, housing applications for DCJ and help with real estate agents.*

*Elham does not speak English. The community worker interprets what she has to say about her new home in Miller, “The house is okay. The bedrooms are very small and there is no garage.” The group wraps at 12pm sharp so that the women can return home to prepare the house and evening meal for their families by the time the afternoon school bell rings. Elham has found nothing like this group in Miller. She will continue to make the drive to Lakemba each week for as long as she can.*

It is recommended that:

- The master plan and future housing mix of Riverwood SSP area include some larger social housing dwellings (4+ bedrooms) designed to suit large families, including multi-generational families; to meet the needs of large households on the waiting list particularly those with an allocation zone preference of Riverwood and/or Canterbury.
- Some larger family dwellings are provided in early redevelopment stages to enable existing large families, particularly those currently living with overcrowding, to be re-housed as soon as possible in the redeveloped Riverwood SSP area should they choose to.

# Appendix A: Map of SA1s in the Riverwood Estate (ABS 2016)

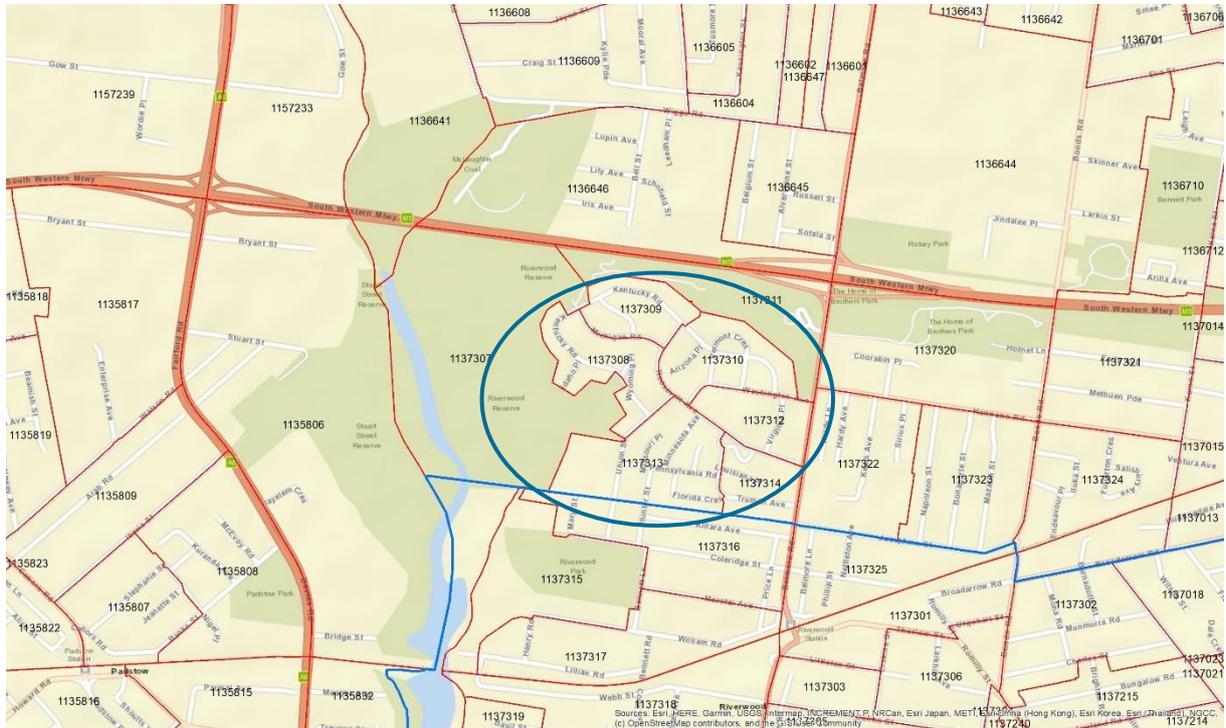


Figure 0.1: SA1 areas within the Riverwood Estate

Source: JSA 2022; ABS 2016

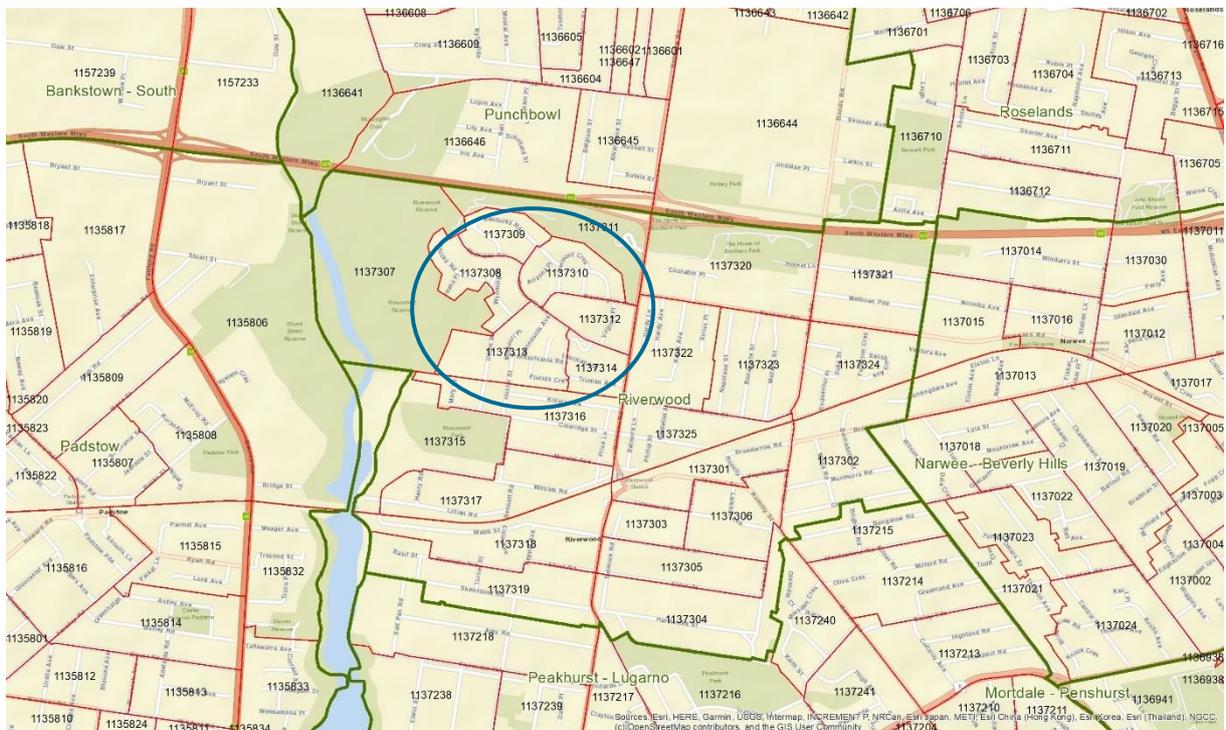


Figure 0.2: SA1 areas within the Riverwood Estate with SA2 Riverwood boundary shown

Source: JSA 2022; ABS 2016