

15 March 2023

Att: Matthew Girvan, Council Officer, Council of the City of Sydney

RE: 82 Wentworth Park Road, Glebe - D/2023/21 - Demolition of existing buildings, tree removal, and construction of a four-storey residential flat building for 43 affordable housing dwellings

Shelter NSW thanks the City of Sydney for the opportunity to comment on the NSW Land and Housing Corporation's (LAHC's) Development Application relating to an existing public housing estate.

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, 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.

Our submissions in recent times have touched on the nearby [Blackwattle Bay State Significant Precinct Plan](#), where we call for minimum targets on public, community, and affordable rental housing to ensure this major urban renewal precinct does not only accommodate those on higher incomes and does not displace low-income families in historic working-class neighbourhoods. We have followed announcements by then-Minister for Housing Melinda Pavey, that nearby public housing estates of 17-31 Cowper Street and 2A-2D Wentworth Park Road will be redeveloped for 100 percent social housing¹. Notably, we commented on the Planning Proposal for [600-660 Elizabeth Street, Redfern](#) where we were dismayed by the limited return on public housing dwellings for this site, consistent with LAHC's 'Communities Plus' 70 private/30 social model².

¹ NSW Department of Planning & Environment. (22 March 2021). *Doubling down on new social housing in Glebe*. Retrieved from <https://www.dpie.nsw.gov.au/land-and-housing-corporation/news/doubling-down-on-new-social-housing-in-glebe>

² NSW DCJ. (n.d.). *Communities Plus*. Retrieved from <https://www.facs.nsw.gov.au/reforms/future-directions/initiatives/communities-plus>

With the change in ownership announcements made recently for the development and management of 600-660 Elizabeth Street, Redfern on our radar³, we summarise our core understandings of the Wentworth Park Road DA:

- 82 Wentworth Park Road, opposite Wentworth Park, occurs on the fringes of the Blackwattle Bay Precinct and is a long-standing public housing estate (35-40 years)
- The existing site comprises 17 semi-detached dwellings and townhouses, all public housing
- It is proposed to replace “17 social housing properties” with “43 affordable housing properties... 100% affordable housing⁴... [which] will continue to be owned by LAHC⁵” in the form of a four-storey residential flat building
- The proposed new building is to include lifts and better accessibility features
- Relocated residents “will have the right to express an interest in returning to the new properties... if they continue to meet the eligibility criteria and a suitable property is available⁶”

Based on these core understandings, Shelter NSW offers the following comments and recommendations to the Council of the City of Sydney and LAHC:

1. Although ‘sustainability principles’ apparently underpin the DA, we question how embodied carbon and energy of a relatively young building (35-40 years old) has factored into the overall analysis of the sustainability of this project. Residents have expressed their concerns with a wasteful knock-down (\$500,000 demolition cost) and rebuild approach when relatively minor refurbishments could improve sustainability and accessibility concerns of existing residents⁷, whilst still preserving this building as the architectural icon that it is⁸.

³ Gorrey, M. in The Sydney Morning Herald. (23 January 2023). *Hundreds of apartments to transform empty block opposite Redfern Oval*. Retrieved from <https://www.smh.com.au/national/nsw/hundreds-of-apartments-to-transform-empty-block-opposite-redfern-oval-20230119-p5cdrn.html>

⁴ FPD Planning. (14 February 2023, p. 7). *Statement of Environmental Effects*. Retrieved from https://cdn.online.cityofsydney.nsw.gov.au/dasearch/onexhibition/1883845-16073577.PDF?_ga=2.173089763.1325706623.1678746166-1593690985.1643605855

⁵ NSW DPE. (November 2022, p. 7). *Engagement Summary Report*. Retrieved from https://cdn.online.cityofsydney.nsw.gov.au/dasearch/onexhibition/1883845-16015498.PDF?_ga=2.177810405.1325706623.1678746166-1593690985.1643605855

⁶ Ibid.

⁷ Action For Public Housing. (2023). *Save 82 Wentworth Park Road, Glebe from demolition*. Retrieved from <https://actionnetwork.org/letters/save-82-wentworth-park-road-glebe-from-demolition>

⁸ Shelter NSW. (September 2022). *40 years old is not old, right?* Retrieved from https://shelternsw.org.au/news_items/40-years-old-is-not-old-right/

2. The nearby State-significant renewal of Blackwattle Bay is a prime opportunity for LAHC to deliver additional public housing properties in a strategic way, without having to fracture an existing, supportive, and diverse community of public housing tenants (many of whom have lived for 10+ years at 82 Wentworth Park Road).
3. There needs to be a distinction made upfront and promises kept around the proportion of new housing that will be public, community, or affordable rental housing. The *Housing SEPP 2021* does not distinguish between these three ownership or management models and refers to “social housing provider” only in some development/amenity provisions.
4. In the renewal of public housing estates, **more land than not should be retained in public ownership** for intergenerational equity of this (increasingly) scarce resource.
5. What binding commitments – beyond the indicative statements submitted for the purposes of the DA – will there be for the site to remain in 100% public ownership (by LAHC) for the purposes of public housing?
6. Affordable rental housing should be provided **in addition to and not instead of** social (and particularly public) housing.
7. In reference to the work done with the Tenants Union NSW and UNSW City Futures Research Centre to create the *Compact For Renewal*⁹, we maintain that prioritising relocation of existing residents back to their homes in the new complex for continued community cohesion must occur. That is to say, LAHC must not use redevelopment and relocation of existing residents as a means for de facto eviction from these neighbourhoods permanently.

Please contact our Policy Officer, Kayla Clanchy (kayla@shelternsw.org.au), should you wish to discuss our submission in more detail.

Sincerely,

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Chief Executive Officer, Shelter NSW

Kayla Clanchy
Policy Officer, Shelter NSW

⁹ Shelter NSW, Tenants Union of NSW, and City Futures Research Centre UNSW. (June 2017). *A Compact for Renewal: What tenants want from renewal*. Retrieved from <https://shelternsw.org.au/wp-content/uploads/2020/11/2017-A-compact-for-renewal-what-tenants-want-from-renewal-2017.pdf>