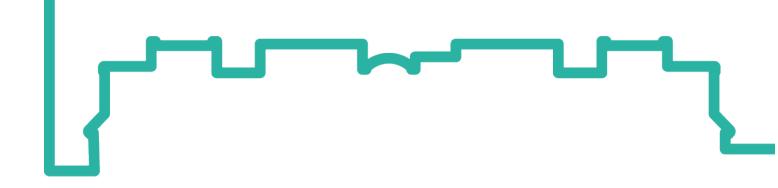


Public Exhibition of the Riverwood Estate Masterplan and Rezoning Proposal

SHELTER NSW SUBMISSION

8 April 2024



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 goodquality 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 have an established interest in the development of social (public and community housing) 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, Housing and Infrastructure for the opportunity.

Background to the NSW Government's proposal

The NSW Government ('the Government') is proposing to rezone and redevelop a small section of the Riverwood Estate ('the site') to create a mix of social, affordable and private housing¹.

This proposal substantially revises an earlier 2022 proposal taking in the entire 30 hectare public housing site. The redevelopment would have seen public land sold and 1,100 public housing dwellings demolished to create 3,900 social and private dwellings over the next 15 to 20 years. Consistent with the Communities Plus model applied at the time, 30% of the dwellings (just 1,170 social homes) would have resulted. In 2022 Shelter NSW formally noted its lack of support for that masterplan, primarily on the grounds that it would see the complete loss of public land, virtually no increase in social housing (public and/or community)

¹ NSW Department of Planning (2024) – Riverwood Estate State Significant Precinct (SSP) accessed 5/4/24 Riverwood Estate SSP | Planning Portal - Department of Planning and Environment (nsw.gov.au)

and that affordable rental housing was not even being considered (in addition to social housing)². We had other comments about the need for consideration of the needs of the large current and very diverse public housing community.

This revised and scaled-down 2024 proposal would see 60³ current public housing dwellings replaced by 420 homes where 50% is intended to be social and affordable **housing in a range of housing types**⁴. The proposal maintains the existing R4 High Density zoning and seeks to increase the maximum building heights from 11.5m to part 42m (12 storeys) and part 29m (8 storeys). Construction is expected to start in 2026/27.

According to information provided to Shelter NSW, the site is currently home to 95 people and consists of 57 dwellings (and childcare centre) in a variety of configurations – from one bedroom (no studios) to four bedroom dwellings.⁵

The Government has not explicitly stated its plans for the proposed dwelling sizes (bundling social, affordable and key worker dwellings) but we note the following information provided in the proposal documents Even the most cursory examination indicates a proposed skewing to smaller dwellings (and thereby fewer tenants per dwelling) and a net loss of three-four bedroom dwellings available for social and affordable tenancies.

Taking account of proposed social housing dwelling sizes we estimate a future social housing tenant population somewhere between 211 – 264 people on this site. In other words, this redevelopment could see as few as 116 additional people living in the social housing dwellings.

| Dwelling Size (Bedrooms) | Current Site (CS) | Current (%) | Proposed Social or Affordable | Proposed (%) | Proposed Private Dwellings | Proposed (%) |
|--------------------------------|----------------------|----------------|-------------------------------------|-----------------|----------------------------------|-----------------|
| Studio/One | 10 | 17% | 82 | 40% | 52 | 25% |
| Two | 25 | 42% | 110 | 53% | 135 | 65% |
| Three | 21 | 36% | 14 | 7% | 20 | 10% |
| Four | 1 | 1% | 0 | 0 | 0 | 0 |
| Total | 57 | | 207 | | 206 | |

Table 1: adapted by Shelter NSW from information provided by Homes NSW.

² Shelter NSW (2022) - Submission on the Riverwood Estate Masterplan & Rezoning - accessed from the **Shelter NSW website**

³ Note – public documentation says 60 dwellings but Shelter NSW directly advised by Planning staff there are 57-59 residential dwellings and one child care centre currently on site.

⁴ NSW Government, Department of Planning, Housing & Infrastructure (DPHI) – accessed 27 March 2024 https://www.planning.nsw.gov.au/plans-for-your-area/priority-growth-areas-and-precincts/riverwood

⁵ Information provided by Homes NSW - Community Engagement on request. Supplied 2/4/24

The proposal also intends to facilitate a variety of other outcomes relating to parks, streets, footpaths, solar access, street trees and other accessible public spaces.⁶

The proposal notes that Homes NSW intends to apply its traditional approach to tenant relocation which culminates in tenants being formally provided with six months' notice prior to relocation.

The site is situated at the eastern side of the large Riverwood Estate sits, within the Canterbury Bankstown LGA as noted below:



Figure 1: Riverwood State Significant Precinct – Revised Rezoning Proposal (amazonaws.com)

⁶ Department of Planning, Housing & Infrastructure (DPHI) (Feb 2024) Riverwood Estate State Significant Precinct – Revised Rezoning Proposal, Explanation of Intended Effect at p5, accessed 27 March 2024 Riverwood State Significant Precinct – Revised Rezoning Proposal (amazonaws.com)

Scope and approach of our submission

Overall, we note that while a dramatically smaller and guite confined proposal the overall approach is intended to facilitate early delivery of an exemplar development to set a precedent for the Riverwood estate.

For this reason, this submission will address broader and precedent-setting issues that we believe ought to be noted at this stage.

Our submission:

- is for the attention of the NSW Government and especially Homes NSW (not just **DPHI).** We will explore a wide range of issues and in some cases, 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 the new development and community in Riverwood.
- will primarily focus on the housing provisions described in the proposal but notes and welcomes other important elements of the proposal associated with improved connectivity, access to facilities and the provision of a child care centre⁷ but will not explicitly address those issues.
- will often refer to data for the broader Riverwood Estate (and Canterbury **Bankstown LGA) area.** Over time, planning for the broader Riverwood estate has moved from the broader area to smaller elements. As with many Homes NSW projects, this forces a project-by-project response by organisations like Shelter NSW. While we appreciate that this may be easier for planners, financiers and future developers we do think this approach has restricted a more fulsome consideration of the cumulative opportunities and risks presented by specific proposals like this one for (a very small part) of the Riverwood Estate. We are however, encouraged by the Government's recognition of this project as a precedent-setting exemplar development.
- notes the NSW Government's current housing supply, density and diversity program across Sydney, including the south west where Bankstown station has been identified as an Accelerated precinct⁸ along with Canterbury and Wiley Park train stations. More broadly, the Canterbury Bankstown Corridor Strategy remains an overarching plan, still noted by Canterbury Bankstown Council ('Council') as bringing

⁷ Canvassed in LAHC (October 2023) Social Infrastructure Study prepared by Cred Consulting – accessed 27/3/24 https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/mastertest/fapub_pdf/NSW+Planning+Portal+Documents/Social+Infrastructure+Assessment+Addendum.pdf 8 NSW Department of Planning, Housing & Infrastructure: https://www.planning.nsw.gov.au/policy-andlegislation/housing/transport-oriented-development-program/accelerated-precincts accessed 28/3/24

an additional 35,000 people into the corridor⁹.

- will consider the impact of this proposed development on the public housing tenants directly impacted by this proposal, who will be required to relocate as well as public housing tenants in the remainder of the estate who will know that their time will come.
- will not, as the proposal does, treat 'social/affordable (and occasionally 'key worker') housing as single type. Shelter NSW recognises social (public and community housing) and affordable rental housing as distinct tenures, responding to very different cohorts, means and needs.

Executive Summary

In 2016, the Canterbury-Bankstown Council ('the LGA') identified that an additional 50,000 dwellings would be required to accommodate over 100,000 extra people (28% growth) by 2036¹⁰ 11. It assessed the need for emergency housing, social housing, low cost rental housing and affordable housing for key workers as high¹².

The 2023 Rental Affordability Index identified large parts of Sydney's South West's **private** rental market to be severely-extremely unaffordable for many lower income households including pensioners and single parents working part time (Appendix 1).

Waiting lists and wait times for social housing are large and unabating. Across South Western Sydney there are currently over 10,621households approved and waiting for as long as ten years for social housing. Excluding applications from singles or couples, 6,500 of those households likely include children (refer Appendix 3).

In NSW there is close to 58,000 households waiting for social housing 13. The stock of social housing has not kept up with demand or population and now languishes at well under 5% (4.5% at June 2023) of all housing stock in NSW.

We appreciate that the NSW Government is challenged to meet the demand for this important government service and infrastructure (after a decade of neglect by the State and Commonwealth) but ask this: where will the large required increases in both public and community housing (social housing) come from if not from redeveloped sites like this at the Riverwood Public Housing Estate?

Ganterbury Bankstown Council website accessed 28/3/24 Sydenham to Bankstown Corridor (nsw.gov.au)

¹⁰ Canterbury-Bankstown Council (2020) <u>Draft Canterbury Bankstown Housing Strategy</u> accessed 23/9/22

¹¹ Canterbury Bankstown: population profile accessed 23/9/22 from Council site

¹² Op. Cit. at p15

¹³ NSW Government (Feb 2024) – accessed 8/4/24 Social housing waiting list data | Family & Community Services (nsw.gov.au)

This revised and scaled-down 2024 proposal would see 60¹⁴ current public housing dwellings replaced by 420 homes where 50% is intended to be social and affordable housing (30% and 20% respectively presumably) and the remainder private market dwellings in a range of housing types¹⁵. We estimate the following: 126 social, 84 affordable rental and 210 private dwellings. Shelter NSW assumes that this ratio is intended to be applied to future proposals for the site.

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'. Our hope is that government redevelopment projects don't replicate this market failure.

We note with some concern that this proposal pays little regard to the large families in Sydney's South West juggling the twin stresses of unaffordable rents and overcrowding. Shelter NSW research into severe overcrowding in Sydney's south west noted that 13.6% of NSW's severely overcrowded households reside in the Canterbury Bankstown LGA. The research also documented the existence and case studies of large families living in overcrowded dwellings within the broader Riverwood Estate (refer Appendix 3)¹⁶.

This proposal will create a denser precinct skewed towards smaller social housing dwellings (studio/1/2 bedrooms) and more concerningly, the net reduction of 3 bedroom social dwellings (from 21 – 14) and the loss of the only 4 bedroom dwelling. What precedent is being set here?

While Shelter NSW does not disagree that there is a need for more smaller dwellings for single households, especially for an aging population, we fear that the proposal will not be able to accommodate the needs of large families already living in the wider estate as well as the needs of other large families on the social housing waiting list (now and in the future).

At Shelter NSW, we advocate for Affordable Rental Housing - in addition to social **housing, not instead of it**. We commend the Government for requiring affordable rental homes on this site. 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 direct and allied workforces who are best placed if they live and work in the same area. As the proposal notes, the Riverwood Estate is welllocated to key transport, employment and services – very suitable for the lower-income workers in the south-west. The proposal to require a substantial number of affordable rental dwellings is commended but in no way should it be seen as an alternative for those seeking

¹⁴ Note – public documentation says 60 dwellings but Shelter NSW directly advised by Planning staff there are between 57-59 residential dwellings and one child care centre currently on site

¹⁵ NSW Government, Department of Planning, Housing & Infrastructure (DPHI) – accessed 27 March 2024 https://www.planning.nsw.gov.au/plans-for-your-area/priority-growth-areas-and-precincts/riverwood ¹⁶ Judith Stubbs & Associates (2023) report prepared for Shelter NSW: *Understanding overcrowding in south*west Sydney - stage 2 report" - accessible here Microsoft Word - FINAL STAGE 2 REPORT 220214 (shelternsw.org.au)

social housing.

In this submission however, we will call for a greater level of assurance. Specifically, any affordable housing ought to be required to be in perpetuity, owned and managed by a Tier 1 or Tier 2 Not-for-profit Community Housing provider (CHP) and be rented to very low to moderate income households for no more than 30% of household income.

Shelter NSW commends the NSW Government for abandoning the requirement that Homes NSW (previously known as the Land and Housing Corporation) be self-funding.

That requirement gave rise to the public/private partnership 'Communities Plus' (70:30) model where valuable public land and dwellings were sold in order to fund the expansion and upgrade of existing and new social housing stock across the state. It generally ignored the need for affordable rental housing as a separate but valuable offering. In our view, the business model capped the ambition for these types of public housing renewal sites. In 2021 Shelter NSW commissioned research, calling on the then NSW Government to rethink and abandon its traditional Communities Plus approach.

While this current proposal for the Riverwood Estate has technically broken with the 70:30 approach, we note with some concern, that the requirement for a bundled 50% social and affordable dwelling is actually not so far from the Communties Plus approach. And while the current documentation does not explicitly confine the social requirement to just 30% of all dwellings we note a recent proposal for Explorer Street, South Eveleigh that does 17.

So, in this submission we will continue 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 substantially more social housing (both public and community). 18

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: "it's not just the buildings, high-density neighbourhoods make life worse for the poor 19 20 This is especially acute for those experiencing the compounding challenges associated with poor mental or physical health; loneliness and isolation. Given the proposed density of the site, care must be taken to create a place where large numbers of vulnerable people and lower-income people in general can reasonably live whether they be in social, affordable or private housing.

¹⁷ Shelter NSW (2023): 231201 Shelter-NSW-submission-Explorer-Street-South-Eveleigh-rezoning-1.pdf (shelternsw.org.au)

¹⁸ Murray, C. & Phibbs, P. (2021) Reimagining the economics of public housing estate at Waterloo – a report for Shelter NSW access via shelternsw

¹⁹ Easthope, H., Troy, L. & Crommelin, L. (2017) It's not just the buildings, high-density neighbourhoods make life worse for the poor (theconversation.com) article in The Conversation published 22 August, 2017 accessed 28/4/22

²⁰ Easthope, H., Troy, L. & Crommelin, L. (2017) This is why apartment living is different for the poor (theconversation.com) article in The Conversation published 21 August, 2017 accessed 28/4/22

The essential argument of our submission is therefore, that the NSW Government has the power and the opportunity to demand more of this redevelopment proposal.

Beyond the specifics of increasing its ambition for the social and affordable housing on the site, but especially the social component, we see a major opportunity to develop ambition for the 'private component'; with a view to developing a high-functioning, connected and diverse community in Riverwood that will grow and change over time.

We call on the NSW Government to commit the necessary funds required to support the: successful relocation of the currently impacted public housing tenants (including large families); the influx of many hundreds 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.

Commensurate with the desire that this be an exemplar development, we encourage the NSW Government to apply best practice tenant engagement approaches. We note that the decision to move on a smaller redevelopment will provide greater opportunities for impacted tenants to relocate within the broader estate, actively engage in any consultation (including co-design) and, if planning to return, watch their new homes being built.

We believe there is a significant requirement that the proposal makes a substantial and far greater contribution to increasing the stock of social housing in the south west of Sydney – commensurate with a large and growing unmet demand, planned population increases (including the Government's own TOD program) and the capacity of Government to drive a better outcome in the broader public interest. This is especially the case if this relatively small redevelopment is to serve as a template for the broader estate.

The proposed development is on NSW public land within a broader estate, home to hundreds of public housing tenants and a long-standing diverse, multicultural community. We commend the NSW Government for committing itself to delivering an exemplar redevelopment but encourage a number of changes and explicit commitments.

For these reasons, Shelter NSW is unable to support the proposal in its current form.

Recommendations

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

- explain why it cannot deliver 100% social and affordable dwellings on this site, but failing that;
- increase its commitment for social and affordable housing on the site to: at least 50% social housing, at least 20% affordable rental housing and 30% private housing commensurate with the current and growing demand for social housing in Sydney's South West and to support low-moderate key/essential workers to live in the new estate
- retain the site in public ownership (through leasehold arrangements rather than sale if necessary)
- apply an innovative commercial, funding and tendering model to the development of this site to maximise social and affordable housing and other 'diverse' forms of housing (including within the 'private' housing component').
- require all Affordable Rental Housing be in perpetuity, owned and managed by a Tier 1 or Tier 2 Not-for-profit Community Housing provider (CHP) and be **rented to very low** to moderate income households for no more than 30% of household income.
- leverage other government programs (State and Commonwealth) to maximise diverse housing within the 'private' dwellings. For example, Shared Equity home purchase; disability and aged care subsidies.
- ensure dwelling size across all tenures but especially social and affordable housing can accommodate large and changing family sizes and circumstances. This is required in order to provide a meaningful 'right of return' to existing tenants and to add to the diversity of dwellings in the broader estate and local area. This might include 'dual key' designs to enable more flexible configurations; larger or multiple living areas to house transient family visitors²¹.
- explicitly resolve the current incidence of severe overcrowding within the **Riverwood Public Housing Estate.**
- Ensure that the current numbers of 3-4 bedrooms social housing dwellings on the site is not reduced.
- ensure lower-income residents (overwhelmingly renters) whether in social, affordable or private dwellings are a key focus for the precinct, building and

²¹ WSP SIA at p 60

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). This may require challenging the traditional narrow focus of private developers, often catering more for investors when designing new apartment buildings leading to limited variation in apartment designs and sizes available ²²

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 (in all tenures), reduce energy bills and generally increase the long-term resilience of the community. Include design provisions to minimise urban heat effect.

ensure any embedded networks are not allowed to act in a monopolistic way, locking tenants, and especially low-income tenants into costly energy contracts.

- As low-income tenants enter/transfer/return to the Riverwood Estate, **incorporate a** general appliance replacement program directed to lower-income households.
- ensure 100% of social and affordable dwellings is delivered to the liveable Housing **Guideline Gold level**, and require that all private market housing should achieve minimum Silver level (with 10% platinum)
- adopt a new and best practice model of tenant engagement and co-design beyond the principles set out in the Compact for Renewal 23 (which essentially argues for tenant consultation in the relocation and resettlement process). With a much smaller redevelopment within a larger estate there is a unique opportunity for genuine consultation and co-design especially taking account of diverse culture, ability, age and family size requirements of current and future tenants.
- as a matter of priority, establish a Riverwood Estate Tenant Relocation Advisory **Group**, with the assistance of the long-running and respected Riverwood Community Centre (RCC) located adjacent to the site. Shelter NSW (long-term member and Co-Chair of the Waterloo Residents Group) is well-placed to also support this advisory group. This recommendation aligns with the earlier recommendations of the Riverwood Community Centre (RCC)²⁴.

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

²² 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

²³ 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

²⁴ Achitectus (2023) Response to Submissions Section 5.2.2 Tenant Relocation, Accessed 8/4/24 Response+To+Submissions-v2.pdf (amazonaws.com)

1. The stock of diverse Social Housing (public and community) needs to grow in Sydney's south-west

Current demand for social housing is not being met. According to the NSW Government's own social housing waitlist data ²⁵ there was on June 30, 2023 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 5,000 households (say 9,000 people) are waiting as long as 10 years to access secure, affordable social housing.

| Allocation Area | General (households) | Priority (households) | Waiting times for all dwelling types (years) |
|-----------------|--------------------------------|---------------------------------|--|
| 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+ |
| Total | 4,348 | 504 | 4,852 |

Table 2: Social housing applicants by allocation zone adapted from NSW Government data (30 June 2023)26

Across the broader South Western Sydney there are currently over 10,621households approved and waiting for as long as ten years for social housing. Excluding applications from singles or couples, 6,500 of those households likely include children (refer Appendix 3).

People seeking homelessness services being turned away in NSW. As detailed in our Shelter NSW Pre Budget Submission²⁷, close to 50% of the over 47,000 people seeking accommodation assistance_from the Specialist Homelessness Sector (SHS) in NSW during

²⁵ Department of Communities and Justice <u>Expected waiting times | Family & Comm</u>unity Services (nsw.gov.au) accessed 27 April 2022. Allocation zone CS01. Note each application represents a household.

²⁶ NSW Government (Feb 2024) accessed 8/4/24 Social housing applicant households on the NSW Housing Register by Allocation Zone (as at 29 February 24) | Family & Community Services

²⁷ Shelter NSW (2022) *Prebudget Submission to NSW Department of Treasury* available at www.shelternsw.org.au

2020-21 were turned away)²⁸. 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.

1.1 Key and Essential Workers suffering acute housing stress across Sydney - including in Sydney's south west

Recent research by Gilbert, Nasreen and Gurran²⁹ 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 <u>no LGAs</u> 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 2020 the Canterbury Bankstown Council noted in its Affordable Housing Strategy LGA noted a number of worrying signs, including: 30

- 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

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

²⁸ Productivity Commission (2021) Annual Report on Housing and Homelessness

²⁹ Gilbert, C., Nasreen, Z. and Gurran, 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.

³⁰ Sourced from the Canterbury Bankstown Affordable Housing Strategy

the current and future need for affordable rental housing without intervention.

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

Shelter NSW has completed 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 was 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

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

According to AHURI research by Easthope et al³¹, 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.³² 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 poor³³ 34

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).

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 Snapshot³⁵.

Beyond issues of affordability, we are also concerned that this development, effectively

³¹ 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)

³² 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.ada.unsw.edu.au/research/projects/equitable-density-place-lower-income-and-disadvantagehouseholds-dense-city/

Easthope, H., Troy, L. & Crommelin, L. (2017) It's not just the buildings, high-density neighbourhoods make life worse for the poor (theconversation.com) article in The Conversation published 22 August, 2017 accessed 28/4/22

³⁴ Easthope,H., Troy,L. & Crommelin,L. (2017) *This is why apartment living is different for the poor* (theconversation.com) article in The Conversation published 21 August, 2017 accessed 28/4/22

³⁵ Accessed 28/4/22 https://www.anglicare.asn.au/research-advocacy/rental-affordability/

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 ³⁶ 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 are 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.³⁷

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.

3. Environmental performance of the Riverwood 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 ³⁸ and spend a disproportionately large part of their disposable income on energy costs (6.4% versus 1.2%).³⁹ Beyond the financial impacts, these households are challenged to the deal with the health and well-being impacts of rising temperatures and rising energy costs ⁴⁰ Whether as private or social/affordable housing renters or low-income

³⁶ Easthope et al (2020) op. cit. Executive Summary at p3

³⁷ Easthope et al (2017) article in The Conversation op. cit.

³⁸ 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

³⁹ Australian Energy Regulator 2019, Affordability in retail energy market, Commonwealth of Australia, Canberra. ⁴⁰ 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

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 broader 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

4. Need for a more innovative and commercial business model

In 2021 Shelter NSW released research calling on the (then) NSW Government to rethink its traditional approach to supplying social housing across the state – an approach that we asserted, was holding back its key agency LAHC and compromising the delivery of enough social housing to make a material difference to the housing crisis in NSW⁴¹. In our public commentary 42 we observed that the *Communities Plus* model had become so entrenched (we believed) it had also stymied creative thinking about how a project like the Waterloo South development could be delivered for the greater public good.

While the current Government has changed approach to public housing estate redevelopment, we believe there are still other options for consideration. The research for example, asserted that <u>public land should not only be retained but leveraged</u>.

By way of illustration for Waterloo South for example, it proposed 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 Troy⁴³ in their submission to the Waterloo South Independent Advisory Group (IAG) asked why the adoption of a private sector model, as the only mechanism through which either plan is enacted had not been debated? They made a strong case for a Not-for-Profit led renewal of Waterloo South as a clear and viable alternative to the public-private partnership development

Appendix A Submission to the Waterloo South Independent Assessment Panel.pdf

⁴¹ Murray,C. & Phibbs,P. (2021) https://shelternsw.org.au/news items/reimagining-the-economics-of-publichousing-estate-renewal-and-the-role-of-government-new-research/)

⁴² Morton, R (March 5 2022) The Saturday Paper <u>Exclusive-leaked-documents-show-public-housing-plan-halved</u> (paywalled)

⁴³ Randolph, B. & Troy, L. (2021)

model pursued under the Communities Plus scheme. Under their proposal, delivery of a substantial component of Affordable Housing by the Community Housing Provider (CHP) sector would open <u>new</u> possibilities for the commercial, financial and operational delivery of the project. We look to the awarding of the 44 contract to develop the mixed-use Elizabeth Street, Redfern project to CHP Bridge Housing as a good example of this approach.

5. 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 <u>already</u> 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

⁴⁴ Bridge Housing 2022 - media announcement

residents across the life of the project. We offer the <u>Compact for Renewal</u> ⁴⁵ 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.

⁴⁵ 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

Appendix 1 - Rental Affordability Index (RAI) South Western Sydney (Q2 2023)

RAI produced by SGS Economics & Planning for organisations including National Shelter. Live data set available at: https://sgsep.com.au/projects/rental-affordability-index

TABLE 1. RENTAL AFFORDABILITY INDEX AND SEVERITY OF RENTAL UNAFFORDABILITY

Index score Share of income spent on rent Relative unaffordability

| <50 | 60% or more | Extremely unaffordable rents |
|---------|-------------|-------------------------------|
| 51-80 | 38-60% | Severely unaffordable rents |
| 81-100 | 30-38% | Unaffordable rents |
| 101-120 | 25-30% | Moderately unaffordable rents |
| 121-150 | 20-25% | Acceptable rents |

Riverwood, Peakhurst & Lugarno

Postcode: 2210

| Household Type | Indictive gross annual income | RAI Score | Rent as a share of income | Relative Unaffordability Category |
|--|--|-----------|---------------------------------|--------------------------------------|
| Single person on Jobseeker | \$22,100 | 24 | 60% or more | Extremely unaffordable |
| Single pensioner | \$36,700 | 42 | 60% or more | Extremely unaffordable |
| Single part-time worker parent on benefits | \$44,800 | 43 | 60% or more | Extremely unaffordable |
| Pensioner couple | \$54,300 | 53 | 60% or more | Extremely unaffordable |
| Hospitality worker | \$62,800 | 84 | 30-38% | Unaffordable rents |
| Student sharehouse | \$84,800 | 72 | 38-60% | Severely unaffordable |
| Minimum wage couple | \$91,800 | 87 | 30-38% | Unaffordable rents |

Bankstown & Condell Park

Postcode: 2200

| Household Type | Indictive gross annual income | RAI Score | Rent as a share of income | Relative Unaffordability Category |
|----------------------------|--|-----------|---------------------------------|--------------------------------------|
| Single person on Jobseeker | \$22,100 | 33 | 60% or more | Extremely unaffordable |

| Single pensioner | \$36,700 | 58 | 38-60% | Severely unaffordable |
|-----------------------------------|----------|-----|--------|-------------------------|
| Single part-time worker parent on | \$44,800 | 52 | 38-60% | Severely unaffordable |
| benefits | | | | |
| Pensioner couple | \$54,300 | 63 | 38-60% | Severely unaffordable |
| Hospitality worker | \$62,800 | 115 | 25-30% | Moderately unaffordable |
| Student sharehouse | \$84,800 | 75 | 38-60% | Severely unaffordable |
| Minimum wage couple | \$91,800 | 104 | 25-30% | Moderately unaffordable |

Punchbowl & Roselands

Postcode: 2196

| Household Type | Indictive gross | RAI Score | Rent as a share of | Relative Unaffordability Category |
|-----------------------------------|-----------------|-----------|--------------------|--------------------------------------|
| | annual | | income | |
| | income | | | |
| Single person on Jobseeker | \$22,100 | 30 | 60% or more | Extremely unaffordable |
| Single pensioner | \$36,700 | 52 | 38-60% | Severely unaffordable |
| Single part-time worker parent on | \$44,800 | 56 | 38-60% | Severely unaffordable |
| benefits | | | | |
| Pensioner couple | \$54,300 | 69 | 38-60% | Severely unaffordable |
| Hospitality worker | \$62,800 | 104 | 25-30% | Moderately unaffordable |
| Student sharehouse | \$84,800 | 70 | 38-60% | Severely unaffordable |
| Minimum wage couple | \$91,800 | 112 | 25-30% | Moderately unaffordable |

Canterbury, Hurlstone Park & Ashbury

Postcode: 2193

| Household Type | Indictive gross annual income | RAI Score | Rent as a share of income | Relative Unaffordability Category |
|--|--|-----------|---------------------------------|--------------------------------------|
| Single person on Jobseeker | \$22,100 | 21 | 60% or more | Extremely unaffordable |
| Single pensioner | \$36,700 | 37 | 60% or more | Extremely unaffordable |
| Single part-time worker parent on benefits | \$44,800 | 38 | 60% or more | Extremely unaffordable |
| Pensioner couple | \$54,300 | 37 | 60% or more | Extremely unaffordable |
| Hospitality worker | \$62,800 | 74 | 38-60% | Severely unaffordable |
| Student sharehouse | \$84,800 | 58 | 38-60% | Severely unaffordable |
| Minimum wage couple | \$91,800 | 76 | 38-60% | Severely unaffordable |

Wiley Park & Lakemba

Postcode: 2195

| Household Type | Indictive | RAI Score | Rent as a | Relative Unaffordability |
|----------------|-----------|-----------|-----------|--------------------------|
| | gross | | share of | Category |
| | annual | | income | |
| | income | | | |

| Single person on Jobseeker | \$22,100 | 33 | 60% or more | Extremely unaffordable |
|--|----------|-----|-------------|-------------------------|
| Single pensioner | \$36,700 | 58 | 38-60% | Severely unaffordable |
| Single part-time worker parent on benefits | \$44,800 | 58 | 38-60% | Severely unaffordable |
| Pensioner couple | \$54,300 | 71 | 38-60% | Severely unaffordable |
| Hospitality worker | \$62,800 | 115 | 25-30% | Moderately unaffordable |
| Student sharehouse | \$84,800 | 73 | 38-60% | Severely unaffordable |
| Minimum wage couple | \$91,800 | 115 | 25-30% | Moderately unaffordable |

Appendix 2 - Social Housing Residential Dwellings Dashboard (June 2023)

Social housing residential dwellings dashboard produced by DCJ. Live data set available at: https://public.tableau.com/app/profile/dcj.statistics/viz/Social_Housing_Residential_Dwellings _17032188360200/Dashboard?publish=yes

| DCJ District South Western Syd | | enancy manage | d by Dwelli ▼ (All) | ng type | ▼ Number of | bedrooms . |
|---|------------------|---------------------|----------------------|------------|-------------|------------|
| Tenancy managed by | Dwelling type | Studio/1 bedroom | 2 bedrooms | 3 bedrooms | 4+ bedrooms | Total |
| | Unit | 4,129 | 2,385 | 497 | 23 | 7,034 |
| Public | Villa | 460 | 589 | 559 | 39 | 1,647 |
| housing | Townhouse | 20 | 718 | 2,145 | 271 | 3,154 |
| (PH) | Cottage | 12 | 1,422 | 5,277 | 1,638 | 8,349 |
| | Sub-total | 4,621 | 5,114 | 8,478 | 1,971 | 20,184 |
| | Unit | 1,519 | 1,502 | 191 | 10 | 3,222 |
| Community | Villa | 49 | 242 | 168 | 20 | 479 |
| housing | Townhouse | 124 | 225 | 554 | 96 | 999 |
| (CH) | Cottage | 35 | 186 | 891 | 395 | 1,507 |
| | Sub-total | 1,727 | 2,155 | 1,804 | 521 | 6,207 |
| | Unit | 23 | 23 | <5 | | 49 |
| Aboriginal | Villa | 7 | 12 | 6 | | 25 |
| Housing Office | Townhouse | | 14 | 34 | <5 | 49 |
| (AHO) | Cottage | | 7 | 239 | 97 | 343 |
| | Sub-total | 30 | 56 | 282 | 98 | 466 |
| | Villa | | <5 | | | <5 |
| Aboriginal Community Housing (ACH) | Townhouse | | | <5 | | <5 |
| | Cottage | | 9 | 46 | 32 | 87 |
| (2011) | Sub-total | | 10 | 50 | 32 | 92 |

Appendix 3 - Severe overcrowding in Sydney's South-West (January 2023)

Extract from Understanding Overcrowding in South West Sydney: Stage 2 Report. Prepared for Shelter NSW by Judith Stubbs & Associates. Accessible at: Microsoft Word - FINAL STAGE 2 REPORT 220214 (shelternsw.org.au)

Table 3.1: Top 20 LGAs by No. of Persons in Severely Crowded and Crowded Dwellings (need 3 & 4+ more b/r) & SEIFA Disadvantage

| | Total Severely Crowded Dwellings | % of All Severely Crowded Dwellings in NSW | Total Severely Crowded + Crowded Dwellings | % of All Severely Crowded + Crowded Dwellings in NSW | SEIFA Disadvantage (% for Australia) |
|--------------------------|--|--|---|---|--------------------------------------|
| Canterbury- Bankstown | 224 | 13.6% | 749 | 12.5% | 24 |
| Cumberland | 197 | 12.0% | 684 | 11.4% | 22 |
| Fairfield | 133 | 8.1% | 518 | 8.7% | 8 |
| Blacktown | 103 | 6.3% | 349 | 5.8% | 58 |
| City of Sydney | 105 | 6.4% | 385 | 6.4% | 83 |
| Liverpool | 61 | 3.7% | 248 | 4.1% | 35 |
| Parramatta | 57 | 3.5% | 203 | 3.4% | 87 |
| Campbelltown (NSW) | 49 | 3.0% | 161 | 2.7% | 33 |
| Bayside (NSW) | 49 | 3.0% | 240 | 4.0% | 94 |
| Georges River | 45 | 2.7% | 194 | 3.2% | 94 |
| Penrith | 29 | 1.8% | 122 | 2.0% | 68 |
| Burwood | 42 | 2.6% | 121 | 2.0% | 68 |

Table 3.2: No. of Persons in Severely Crowded Dwellings (need 4+ more bedrooms)

| | Bankstown SA3 | Canterbury SA3 | Auburn SA3 | Fairfield SA3 | Greater Sydney |
|------|------------------|-------------------|------------|---------------|-------------------|
| 2016 | 787 | 998 | 1,537 | 1,613 | 15,488 |
| 2021 | 812 | 1,007 | 940 | 1,153 | 11,986 |

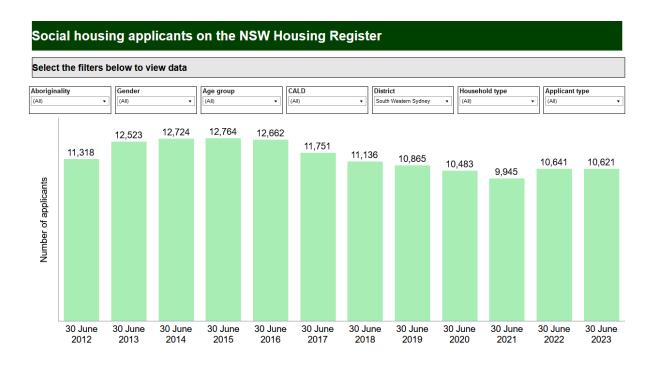
Source: ABS Census 2016, 2021

Table 3.4: Number of severely crowded dwellings (need 4+ more bedrooms)

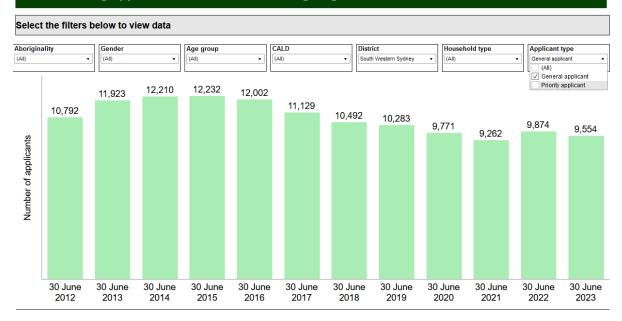
| | Bankstown SA3 | Canterbury SA3 | Auburn SA3 | Fairfield SA3 | Greater Sydney |
|------|------------------|-------------------|------------|---------------|-------------------|
| 2016 | 94 | 125 | 195 | 173 | 1,896 |
| 2021 | 86 | 114 | 110 | 121 | 1,353 |

Source: ABS Census 2016, 2021

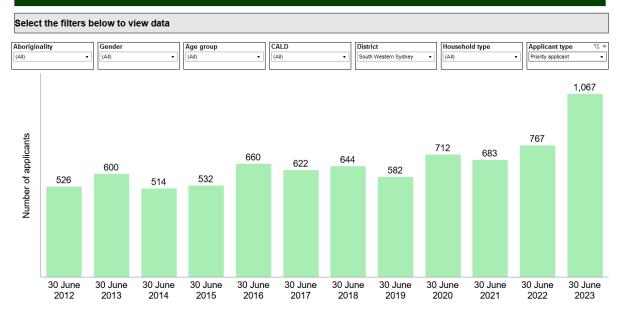
Appendix 4 - Social housing applicants in South Western Sydney as at 30 June 2023)

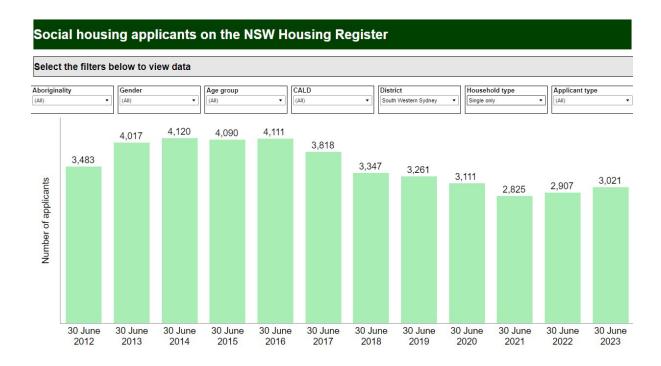


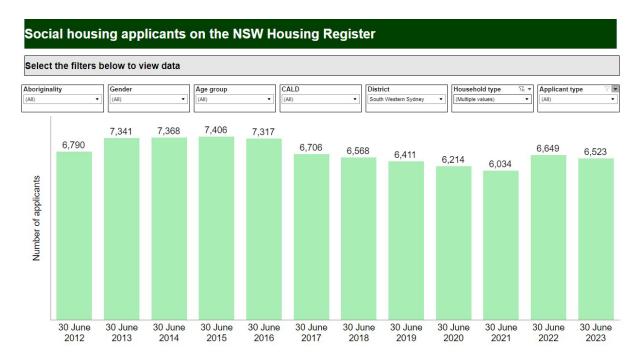
Social housing applicants on the NSW Housing Register



Social housing applicants on the NSW Housing Register







Household type: Single parent with dependent children, single parent with dependent children other households. Excluding couple only & single only