



Public Exhibition of the Waterloo South People and Place Plan (draft) – Homes NSW

SHELTER NSW SUBMISSION

17 June 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 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 whether that be low-income renters or low-income homeowners struggling with rising mortgage costs and/or the costs and complexities of strata schemes.

Across our major cities we see lower-cost properties being steadily replaced with new ones at higher rents. New concentrations of disadvantage are being created as low-income households are displaced without the safety net of social (public and community) housing.

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 at Waterloo South and elsewhere and associated property development. Our submissions can be found on our [Shelter NSW website](#).

We are also active members of the *Groundswell* coalition. *Groundswell* comprises a number of local community organisations from the Redfern and Waterloo area including Counterpoint, REDwatch, Inner Sydney Voice, Tenants' Union of NSW and Redfern Legal centre. It acts as a point of liaison between NSW Government agencies and community members regarding the development of the broader Waterloo and Redfern. Our Principal Policy Officer Cathryn Callaghan also co-chairs the (resident-led) Waterloo Redevelopment Group (WRG) and is a member of the City of Sydney's Housing for all Working Group.

Shelter NSW welcomes the opportunity to make a submission and thanks Homes NSW for the opportunity.

Scope and approach of our submission

The proposal to redevelop the Waterloo South Estate is '*one of the state's most significant redevelopment projects*' according to the NSW Government. We agree. 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 City of Sydney and State. As such, Shelter NSW has made numerous submissions about the merits (or otherwise) of redeveloping this public housing estate at all; of the varying commercial approaches adopted by various NSW Governments along the way and the optimal public interest outcomes.

In this submission we will not re-explore those themes or arguments; except to say that we would like to see a greater acknowledgement in the plan that this is currently and has been for many decades a 100% public housing estate and post-development it will not be. This is a fundamental change that does impact current (and future) tenants and is not wholly supported by the broader community (including many Shelter NSW members).

In this submission we will call on Homes NSW to bear this in mind when describing the history of the estate and specifically in its relocation processes where current tenants are not just preparing to move homes but also changing landlord.

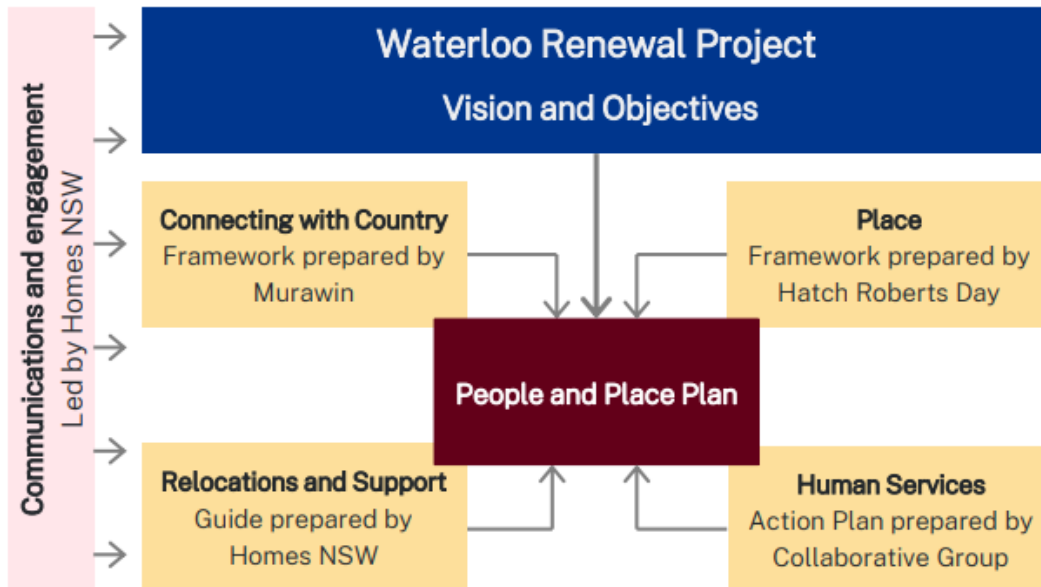
Our submission:

- **is for the attention of the NSW Government (not just Homes NSW).** 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 developing and future community.
- **will often refer to data for the broader Waterloo Estate and neighbouring areas.** For well over decade, planning for the broader Redfern-Waterloo area has moved from the broader area to smaller elements. As with many Homes NSW projects, this forces a project-by-project, site-by-site view. While we appreciate that this may be easier for planners, project managers, financiers and future developers we do think this approach has restricted a more fulsome consideration of the cumulative opportunities and risks. We note in particular the current and ongoing public housing communities (including in adjacent high-rise) that will remain as such for up to 15 years. We note that the overall project renewal vision and objectives refer to the (broader?) Waterloo Renewal Project not just the Waterloo South precinct. We commend this broader approach but will query whether the identified actions do in fact align with this.
- **The submission will make a number of high-level observations and recommendations and follow the structure of the *Draft People and Place Plan (DPPP)* with a number of more specific recommendations following.**

Background to the NSW Government’s plan

The NSW Government (Homes NSW) has placed its *Draft People and Place Plan (DPPP)* on its [Waterloo South](#) site for comment. The DPPP document sets out various levels of consideration bringing together planning that has already happened with various diverse groups of agencies and organisations over a number of years including work on the Human Services Plan.

The DPPP describes the connections between these various pieces in the following way:



The DPPP document has various levels of consideration:

1. For the overall Waterloo Renewal Project itself, underpinned by six objectives:

About the Waterloo Renewal Project

Homes NSW is working across government and with the community to renew Waterloo’s essential social housing infrastructure and deliver housing supply in a vibrant place to live, work and visit. The Waterloo Renewal Project will enhance the strength and diversity of Waterloo, a unique urban village on Gadigal Land.

The project is underpinned by six objectives:

- **New and better social housing:** Deliver more and better social housing in mixed communities, to meet the needs of residents now and in the future.
- **Positive outcomes for residents:** Create a place that supports residents’ health and wellbeing and sensitively manages change over time.
- **Outcomes for Aboriginal people:** Prioritise outcomes for the Redfern - Waterloo Aboriginal and Torres Strait Islander community through planning, delivery and operations.
- **An authentic sense of place:** Building on Waterloo’s past and current strengths to create an authentic, distinctive and welcoming place.
- **Environmental sustainability:** Support a community that is resilient to climate change.
- **Strong collaboration:** Collaborate with the community, not-for-profit and private sector to deliver enduring social and housing outcomes.

Homes NSW is undertaking a comprehensive process to procure a renewal partner for the project. The Renewal Partner will include one of Australia’s leading developers, a Tier 1 community provider and an Aboriginal community housing provider.

It is expected the Renewal Partner will be announced in mid to late 2024.



2. Purpose and scope of the People and Place Plan (DPP)

Purpose of this plan

In alignment with the vision and objectives for the Waterloo Renewal Project, the purpose of this plan is to:

- Create a place that supports the health and wellbeing of all residents, now and in the future
- Sensitively manage the impacts of renewal on existing residents
- Build on and bring together the wide range of engagement, analysis and planning previously undertaken as part of the Waterloo Renewal Project
- Provide clarity about the services, programs and infrastructure which will support the Waterloo community.

3. People and Place actions – 7 x Pillars

The plan sets out 76 actions assembled under seven pillars as described below.

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General Commentary

Shelter NSW welcomes the draft plan and acknowledges the challenge of clearly but simply setting out what will be required to deliver the intended outcomes of this very large and significant urban renewal project, one with significant history and a completion time that could run over decades.

Since coming to Government Shelter NSW has observed and commended a concerted effort by the newly formed Homes NSW to change and improve its tenant engagement and communication practices. In recognising that however, we are critiquing this plan as one that that needs to stand the test of time and the inevitable challenges that a project (and broader endeavour) of this size will bring.

Overall, we think the DPPP provides a sound start to identifying the key types of high-level actions that will need to be pursued and co-ordinated; the broad distinction as to when they will be required (delivery or ongoing) and the delineation as to which stakeholders will be required to either lead or support the activity.

Our observations and recommendations are offered as suggestions as to how the plan itself can be more robust, resilient and real.

Our key observations can be grouped into the following themes:

1. Where is the end state vision for the Waterloo precinct and the compelling descriptors of what kind of place it will be and the people it will be home to?

While the Waterloo Renewal Project six objectives do set out some answers to the questions it doesn't really describe the 'future state', the expected or hoped for demography or the key metrics that will provide an assessment as to whether the overall renewal project ultimately is achieved? In 10 years', time what will the community look like? What does success look like?

For example, will this precinct offer genuine housing affordability for all? Will it be a place that people from all walks of life, ages, cultures, abilities and family types will be able to affordably and happily live, work, play and stay in?

We wonder if the planning for the future precinct is based on an extrapolation of the current demographic profile rather than a plan for the future? For example, we observe the important recognition of the need for current and future residents to *age in place* but is there enough active planning about the need for new residents, yet to be born or move into the precinct to *grow in place*?

The forces of gentrification and displacement need to be actively resisted. Shelter NSW is calling for an explicit commitment to ensuring that Waterloo will be a place that low-income people and households (of all tenures) can genuinely afford to live in; in well-built and designed homes, buildings and public spaces and with access to valued low-cost (or free)

services and facilities (commercial, health, retail and hospitality).

Recommendation: that a seventh objective be added to the Waterloo Renewal Project set (of six) formally identifying the goal of Waterloo South being a place where all (and especially very-low to low income people) can happily and affordably to live in

2. The Plan needs to be dynamic and robust – anticipating the dynamic flow of people, services and organisations returning to, moving to or even being born in Waterloo South.

While it is not clear how the redeveloped project will be managed (staging versus other approaches) we assume there will be a dynamic flow of people leaving, returning or coming to live in Waterloo for the first time; whether they be (current) public housing, social housing or private tenants; homeowners (resident or not).

Additionally, there will be commercial tenants, services and organisations also moving in and out. While the DPPP does recognise there is as an “operational phase’ we would like to see greater recognition of this ongoing dynamic that is likely to straddle the delivery and operational phases. At its most practical level, we would like to see tenant engagement processes be tested against this reality. How will current tenants, intending to return for example, remain connected to their community and this process during the delivery phase?

Recommendation: once a delivery partner is confirmed, assess whether the implementation is as straight forward as it is implied i.e ‘delivery’ and then ‘operational’ or a much more dynamic process requiring ongoing cycles of action and potentially parallel processes of engagement especially with tenants, representative bodies and local community organisations.

3. Governance and Accountability – needs to be clear line to the top

Beyond the dynamics of individual people moving in and out of the precinct there is the high-level and potentially profound impact of a possible: change of Government; Ministerial arrangements; reconfigurations of Departments; impact of NSW (and indeed Commonwealth or local) government funding on the direct but affiliated agencies e.g. Health, as well as the normal commercial risks associated with Renewal Partners.

Diffused accountability can undermine the delivery of project outcomes and especially over a project that may take up to 15 years.

While the DPPP does a good job of setting the various stakeholders responsible for various actions Shelter NSW would like to see the clear, high-level and enduring accountability of the NSW Government confirmed and captured in this DPPP.

Recommendation: identify clear Ministerial accountability for the long-term plan and core commitments as well as the overarching accountability with Homes NSW (not shared with a future Renewal partner). This could be demonstrated by a Ministerial or Cabinet Statement.

4. Plan for the whole place and all of the people – especially renters in the private market

While the DPPP does imply it is planning for the whole Waterloo community its detailed actions suggest that it is primarily concerned with the people living in social and affordable housing. It doesn't for example, identify future Body Corporates in private buildings as stakeholders in the Waterloo Community nor the many hundreds of private renters.

According to AHURI research by Easthope et al¹ in Australia, 39 per cent of households living in high-density apartments are lower income households. And with this trend towards apartment living increasing and being encouraged in NSW there are clear implications for policy-makers². As the researchers elaborate, while a *broad cross-section of Australian society lives in apartments...lower-income households are over-represented compared to other dwelling types* and 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"*^{3 4}

At Shelter NSW we routinely advocate for more and better social housing (public and community) and affordable rental housing (as well as, not instead of social housing). We do however, remind decision-makers that they should be equally concerned about those living in in the 'private' component. At Waterloo South, this will be 50% of the future residential base many of whom will be renters (and specifically, low income renters) dealing with the vagaries of the private rental system. And while we appreciate and endorse the intent to deliver a built environment that is 'tenure blind', the lived experience of actual tenancy differences is anything but (eyes wide open").

¹ 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

² 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-disadvantage-households-dense-city/>

³ 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

⁴ 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

Darcy and Rogers (2019)⁵ 2020 research into the demographics of the suburb of Waterloo, revealed that 63% of private dwellings in the suburb of Waterloo (according to the 2016 census) are privately rented – double the Greater Sydney proportion. While Waterloo is already a dense suburb dominated by renters this Waterloo South project will see that phenomena amplified, and, along with it, a potential escalation of the downsides of high-density apartment living with potentially large, lower-income renting households.

Furthermore, they have found that the Waterloo South estate redevelopment would reduce the overall suburb's proportion of social housing dwellings from 30% to about 17%. Private renters might rise to more than 50% of households and about 30% of households in the suburb would be owner-occupiers⁶.

We see a major opportunity to develop ambition for the 'private component'; with a view to developing a high-functioning, cohesive and diverse community in Waterloo South that will grow and change over time.

Recommendations:

- Assess whether any commitment made to social or affordable tenants can be extended to renters in the private market. This may lead to a higher-standard being applied to private buildings within the precinct; and active outreach to private tenants in the co-design of community processes for example.
- From the outset, recognise private owners (as represented by Body Corporates) as stakeholder organisations. Any basic appreciation of NSW's strata arrangements would alert decision-makers to the significant powers these bodies have.
- Actively recognise and respond to the impact of transient renting populations on broader community building activities.
- Assess what options exist to support more innovative models for the private component. For example, shared equity home ownership, co-operative housing.

⁵ Darcy, M & Rogers, D (2019) University of Sydney, The Henry Halloran Trust [Social Mix discussion paper](#) at p9

⁶ Rogers, D & Darcy, M (2020) <https://theconversation.com/public-housing-renewal-likely-to-drive-shift-to-private-renters-not-owners-in-sydney-133352> article published on the online journal The Conversation, accessed 28/4/22

5. Recognise the reality of this change on current public housing residents – including the change of landlord.

This project has already been stressful for many existing public housing tenants over a number of years.

This project involves not just the physical relocation of existing public housing tenants but for most, a change of landlord – from the NSW Government (as a public housing tenant) to a Community Housing Provider (CHP) (as a social housing tenant). Many are already concerned about this and require decent information, genuine responses to their questions and proper explanations as to how their tenancies will be managed.

Recommendation: While understanding that ‘social housing is a technical term that describes housing for very low income earners provided by both Government and the Community Housing Sector (abiding by Ministerial Guidelines), Shelter NSW recommends that the term *public housing* be used when it really is the most appropriate. For example, when describing the history of the Waterloo Public Housing Estate and in Homes NSW relocation processes.

6. Build places and homes for a diverse future population

Shelter NSW acknowledges the commitment to ensuring at least 30% of future dwellings are social housing and 20% are affordable housing. We also note the intent that buildings are tenure blind (though we prefer to term ‘neutral’ as developers and designers **need to be** consciously designing dwellings and places with the needs of diverse cohorts and often vulnerable people in mind).

We note however that this proposal will likely create a denser precinct skewed towards smaller social housing dwellings (studio/1/2 bedrooms). And while Shelter NSW does not disagree that there is a need for smaller dwellings for single households, especially for an aging population, we fear that the eventual precinct will not be able to accommodate the needs of large families already living in the estate as well as the needs of other large families on the inner city social housing waiting list (now and in the future).

We also observe that the private housing market is an unreliable supplier of the ‘right type of housing, in the right place, at the right time’ especially for families wanting or needing to live in apartments.⁷ Our hope is that government redevelopment projects don’t allow this market failure to be replicated – even in the ‘private’ housing.

⁷⁷ Knight, B (April 2024) overview of UNSW Research by Professor Philip Oldfield [Sydney apartment layouts don't suit families, study suggests \(unsw.edu.au\)](https://www.unsw.edu.au/research/sydney-apartment-layouts-dont-suit-families-study-suggests)

Recommendations:

- Commensurate with an accurate forecast of the diverse population (in 10-15 years), ensure dwelling configurations (numbers of bedrooms) and general dwelling and building layouts support a diverse resident and household population.
- Assess whether any commitment made for social or affordable dwellings ought also be applied to private dwellings (err on the side of higher standards).
- Ensure Community Housing tenancy selection processes are aligned with the renewal goals.

7. Acknowledge the reality of life in high density – especially for the poor (whether living in social, affordable or private housing) and mitigate

For all of the focus on buildings and places we can't ignore the realities of life in diverse and highly dense environments. The DPPP needs to recognise, expect and plan for this.

The NSW Government acknowledges that's its tenancy populations are increasingly vulnerable, requiring significant support. The Waterloo South Humans Services Plan is a testament to that.

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"*^{8 9} This is especially acute for those experiencing the compounding challenges associated with poor mental or physical health; loneliness and isolation.

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 any renter (let alone those with families, disabilities or other complicating factors)

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.

⁸ 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

⁹ 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

Recommendations:

We call on the Government to:

- formally and transparently acknowledge the complexities of relocating, returning and welcoming such a large, lower-income renting population over time (including vulnerable people from all tenures).
- provide the necessary funds required to support its own agencies, community sector and tenancy advisory organisations during the delivery and operational phases on this length project.
- advocate to the Commonwealth for the necessary funding to support the future Waterloo precinct which by necessity will rely heavily on public health and education services.

8. Resident and tenant engagement, consultation and co-design

The NSW Government announced the redevelopment of the Waterloo public housing estate in December 2015. The impact of this project on current public tenants has been keenly felt ever since. Over the near-decade, various changes have been made to planning controls, consent authorities, and there have been different iterations of the plans.

Commensurate with the desire that this be an exemplar development, we encourage the NSW Government to apply best practice tenant engagement, formal representative and genuine consultation and co-design approaches. This would require Homes NSW and its consortium partners to align its approach with the existing Waterloo Renewal Principles¹⁰ and any state-level compact that might be adopted.

We offer the [Compact for Renewal](#)¹¹ as a reminder of the things that tenants most want and expect from an estate renewal process right from the earliest stage (now passed at Waterloo South) right through to relocation and possible return.

Recommendations:

¹⁰ In 2022, Waterloo residents and Groundswell agencies (coalition of local agencies and state-wide peak bodies) worked with the (then) Land and Housing Corporation and the Department of Communities and Justice to identify Waterloo South specific principles and ways of working through the renewal.

¹¹ *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

- Representative tenants' organisations should be added to the list of stakeholders. These may include public/social housing tenants (whether current/returning or new) and potentially residents in the private component. This is especially the case for any tenant groups that are formally elected.
- We commend the submissions of affiliated organisations Counterpoint and REDwatch which have and will continue to provide genuine and very practical tenant and resident feedback.
- For future cohorts that are not currently well-represented in current tenant populations use data and research to determine needs and preferences.

Specific Recommendations

01 About this plan - Recommendations

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

- **Articulate the desired 'Future State' for Waterloo South** – demographically what is the anticipated diversity of 'the people' that this future place needs to welcome and support? This is a much broader statement than dwelling type or tenure or even the six objectives and seven pillars set out for the Waterloo Renewal project.

02 Waterloo South Now - Recommendations

- **Don't airbrush the term public housing from this plan or the area's history** – it has a particular meaning in describing the history of the estate and in recognising the change many tenants will experience (not just moving dwellings but landlord). Specifically, the recount of the early development of Waterloo on page 11 should refer to 1939-1959 First ~~social~~ public housing in Waterloo
- **Be careful with scoping tenants in and out of this plan.** Shelter NSW appreciates the efforts of Homes NSW to clearly define the geographical boundaries of the current renewal project so that public housing tenants in other parts of the broader estate understand the likely (minimal) impact on them. For the purposes of building a comprehensive People and Place Plan however, we advocate that those tenants ought to be acknowledged and actively engaged (at least in terms of communications)

03 Waterloo South Future – Recommendations

03.1 Working together

The 'Working Together' section sets out the various stakeholders but there is no reference at all to tenants - whether social housing tenants (current/returning public housing tenants in Waterloo South or nearby) or new Community Housing Tenants. Private residents are also not acknowledged. Homeowners will be formally represented by Body Corporates who typically assert their rights through 'by laws'. Renters in the private market typically have little or no say in the operation of their buildings.

- **Action 1.3** (as per above) **Notwithstanding that these various tenant groups are not organisations as such Shelter NSW recommends, they be formally identified as stakeholders.** Apply and encourage best practice tenant engagement and representative approaches across all tenures types.
- **Action 1.4 – Governance.** Shelter NSW commends the inclusion of this action. We refer Homes NSW to a series of very helpful recommendations made in a paper prepared for the Australian Government¹² regarding local governance structures in location-based initiatives. The recommends, amongst other things the creation of *a formal council, board or similar entity which represents the community in all its diversity, including representatives of residents, the non-profit sector, business (particularly major employers), all levels of government, philanthropy, and special interest groups.*
- **Ensure local community organisations and service providers are adequately resourced to enable meaningful participation in governance processes.**
- Anticipating the inevitable challenges of a project of this complexity – **proactively identify escalation processes, especially for tenants.**

03.2 Working with social housing residents

Shelter NSW recognises that the extensive series of actions identified in action area 2 have been developed with the benefit of many prior relocation processes in mind. Various Waterloo South tenant and local service organisations have also provided feedback about various elements over the last year or so (which have already been acted on). The following points are provided as additional points for further consideration.

¹² Australian Social Inclusion Board (2011), *Governance Models for Location Based Initiatives* Paper prepared for the Australian Federal Government Accessed 16 June 2024: [Governancemodelsforlocations.pdf \(bsl.org.au\)](https://www.bsl.org.au/governancemodelsforlocations.pdf) refer recommendations pp58-59

- Recognise the reality of this change on current residents – change of landlord.**
 This project involves not just the physical relocation of existing tenants but for many, a change of landlord – from the NSW Government (as a public housing tenant) to a Community Housing Provider (CHP) (as a social housing tenant). Many are already concerned about this and require decent information and proper explanations. While understanding that ‘social housing’ is a technical term that embraces housing for very low income earners by both Government and CHP Shelter NSW recommends that the term public housing be used when it really is the most appropriate.
- Action 2.4.** Public Housing tenants contributing to the [Compact for Renewal](#) research observed that the approach, skill and approach of the assigned relocation officer was the determining factor as to whether their individual ‘relocation story’ was positive or negative. Shelter NSW encourages Homes NSW to **ensure that all staff involved with relocating tenants are appropriately trained and supported** to undertake what can be very challenging (but important) work. Such training might include advice and skill development regarding trauma-informed approaches¹³. We also encourage Homes NSW to clearly articulate to Relocation Officers the opportunities they have within policy and their role accountability, to customise relocation approaches as required for tenant needs.
- Action 2.7 Explicitly identify the Right of Return in all significant communications.**
 We understand there may be a plan to only note this right in formal tenant letters after the tenant interviews. We believe this will create unnecessary confusion and stress. Given that Homes NSW is so clear on this right (including in the DPPP) Shelter NSW recommends this be noted in any letters that go to tenants before then.
- Action 2.8 Shelter NSW calls on the NSW Government to deliver substantially more than 30% of all housing as social housing and the stock itself cater to a diverse range of needs** including ability, age (young and old), family size and culture. This might be secured over time.
- Dwelling size across all tenures (social, affordable and private) need to be able to accommodate large and changing family sizes and circumstances.** Renewal partners should be required to deliver a diverse mix. This is required in order to provide a meaningful ‘right of return’ to existing public housing 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 visitors¹⁴.
- Action 2.9 Affordable housing should be allocated to a diverse range of households by CHPs.** Given the relatively wide range of household income types that might be technically eligible for affordable rental housing care needs to be taken that there isn’t a skew towards the higher income households. Shelter NSW commends a research paper

¹³ The [Kinchela Boys’ Home](#) organisation for example, is uniquely qualified to provide advice on the appropriate ways for relocation officers to work with members of the Stolen Generation

¹⁵ recently prepared for us which recommends a requirement on providers of regulated affordable housing to deliver a diverse range of well-designed dwelling and building.

- **Action 2.10** Shelter NSW commends the action to explore **innovative housing models** but notes that **many of these approaches already exist and simply need implementation.**¹⁶ We also encourage ‘innovation’ to be applied across all housing and tenure types. Innovative models include: Co-operative housing; targeted, cohort specific Shared Equity home purchase schemes (State and Commonwealth) including specifically for First Nations people as noted in the later Action 3.10.
- **Action 2.11 ensure the commitment to ‘tenure blind’ doesn’t block insight and design for cohort specific needs.**
- **Adopt genuine co-design approaches and apply research-based insight – to the dwelling, building and local area.** Shelter NSW commends the *Equitable Density* research series ¹⁷ produced for Shelter NSW by academics from the UNSW City Futures Research Centre. Across three reports (building, neighbourhood and metropolitan scale) *The place for lower income and disadvantaged households in a dense city* the series explores the particular needs and experiences of low-income people in dense environments. These will be further addressed in our comments on supporting health and well-being (pillar 4)

03.3 Working with the Aboriginal community

Shelter NSW commends the commitment to requiring at least 15% of social and affordable housing be provided to First Nations tenants but again note that this needs to provide for a diverse range of households and needs. The commitment (Action 3.8) to ensuring an Aboriginal Community Housing Provider is especially welcomed.

We endorse the recommendations made by the City of Sydney in its submission, to:

- *Provide support for sustaining tenancies and ensuring involvement in community decision-making in a format that is relevant and suitable for them*
- *Ensure Aboriginal people manage any Aboriginal cultural space.*

¹⁵ Gilbert, C. and Zanardo, M. (2024) *What an Inclusionary Housing Policy Should be: Considerations for Designing Inclusionary Housing Approaches for NSW*. A Research Report for Shelter NSW, Sydney: The University of Sydney and Shelter NSW. Accessed [Shelter-report-FINAL-18-January-2024.pdf \(shelternsw.org.au\)](#)

¹⁶ Shelter NSW (2023) Media Release, Waterloo South – *Good, but still time for a better deal for social housing and to raise the bar on what Government can deliver* accessed 16 June 2024 [Waterloo-South-Shelter-NSW-response-to-NSW-Gov-August-Announcement.pdf \(shelternsw.org.au\)](#)

¹⁷ Easthope, H., Troy, L. & Crommelin, L. (2017) *Equitable Density The place for lower income and disadvantaged households in a dense city – Report 1 The Building Scale* accessed 16 June 2024 [Equitable-Density-The-Building-Scale-2017.pdf \(shelternsw.org.au\)](#)

03.4 Supporting health and wellbeing

People need access to homes that are safe and accessible to live in across all stages of life. Conversely, we can think of every single dwelling at the future Waterloo South as one that may be a home to a whole variety of people over the space of decades. 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 ¹⁸

In Section 3.2 we noted that there will be particular vulnerability in very-low, low income households across all tenure types, and further, that our research shows that highly dense built environments can exacerbate this. We refer Homes NSW to our research series which offers specific advice on this matter.¹⁹

Along with our fellow Groundswell advocate organisations (like REDwatch and Counterpoint) we are also unclear as to how the DPPP interacts with the *Waterloo Human Service Collaborative's Plan*. That plan is concerned with the current human service issues facing tenants and agencies. We recommend this be made clearer in the DPPP, looking ahead to the stage where Community Housing Providers start to pick up responsibilities for community programs and direct tenancy management.

- **Action 4.2 and 6.7 – raise accessibility standards by requiring 100% of social and affordable dwellings be delivered to the liveable Housing Guideline Gold level**, and require that all private market housing should achieve minimum Silver level (with 10% platinum).

Shelter NSW noted in its recent submission regarding the Riverwood Public Estate redevelopment²⁰ that **NSW is already (and inexplicably) lagging other major states in this regard**. The minimum accessibility guidelines to Silver Level Liveable Housing Design (with additional prescription to build to Gold Level) were incorporated into the National Construction Code (NCC) by a majority decision taken by the Building Ministers Meeting (BMM) in early 2021. While the majority of Australian jurisdictions have implemented the guidelines in line with the NCC changes (from 1 September 2022), NSW exercised its discretion to 'opt out'. We continue to assert that NSW must follow other states and territories to adopt these provisions and enable better homes for people with disability. In

¹⁸ Easthope, H., Crommelin, L., Troy, L., Davison, G., Nethercote, M., Foster, S., van den Nouweland, 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 \(ahuri.edu.au\)](http://www.ahuri.edu.au/research/finalreports/329)

¹⁹ Op.Cit.

²⁰ Shelter NSW (2024) *Submission re the Public Exhibition of the Riverwood Estate Masterplan and Rezoning Proposal* Accessed 16 June 2024 [8 4-Shelter-NSW-Riverwood-Estate-Masterplan-Rezoning-Proposal-April-2024.pdf \(sheltersnsw.org.au\)](https://www.sheltersnsw.org.au/4-Shelter-NSW-Riverwood-Estate-Masterplan-Rezoning-Proposal-April-2024.pdf)

the meantime, Homes NSW should demand a generally higher standard across the redeveloped site.

- **Action 4.4 commitment to provide affordable health services must include bulk billing GPs, ideally within the Health One facility model.** In the case where the latter cannot be provided the site requires a meaningful, funded alternative, which would have provided affordable allied health and bulk billing services
- **Action 4.6 – extend the life-cycle** to include **supporting babies, children, children and young people to grow in place** (supplementing the important commitment to support older people to Age in Place)

03.6 Being green and clean

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 respond²¹ and spend a disproportionately large part of their disposable income on energy costs (6.4% versus 1.2%).²² Beyond the financial impacts, these households are challenged to deal with the health and well-being impacts of rising temperatures and rising energy costs²³ 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 broader Waterloo 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.

As NSW adopts more dense forms of housing, more buildings (like the future private buildings at Waterloo South) are being covered by strata schemes. These schemes can create barriers to environmental sustainability.

²¹ 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](#)

²² Australian Energy Regulator 2019, *Affordability in retail energy market*, Commonwealth of Australia, Canberra.

²³ 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)

For example, according to the Strata Community Association 18% of houses in New South Wales have adopted some form of solar power, the equivalent figure in strata properties is only 0.5%²⁴, despite a similar level of interest in both groups. This discrepancy highlights how the collective decision-making process within strata can impede the adoption of beneficial technologies. The benefits of solar power are clear, installing a 5.5 kW Solar PV system in Sydney can result in annual electricity bill savings of \$2647.5 and a 3.04 tonne reduction in CO2 emissions²⁵. However, the difficulty of achieving consensus among multiple owners often stalls such initiatives.

Shelter NSW supports all efforts outlined in the DPPP to ensure environmental sustainability in the design and construction phases as well as the operational phase where issues such well-funded maintenance programs will be required (dwelling, building, place).

We make the following specific additional recommendations:

- **Action 7.7 energy and water efficient homes** – recognise and mitigate the potential impact and complexity of strata laws applying in private buildings often to the detriment of low-income home owners and tenants.
- **Ensure 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 or residents enter/transfer/return to the Waterloo South precinct, **incorporate a general appliance replacement program directed to lower-income households (social, affordable or private)**.
- **In anticipation of the natural flow of residents in and out of the precinct over time develop an on-site recycling or swap process (to prevent dumping)**

²⁴ Strata Community Association (2021) – Sustainability in strata: Cutting through the complexity – accessed April 22 2024
<https://inside.strata.community/sustainability-in-strata-cutting-through-the-complexity/#:~:text=It%20is%20no%20wonder%2018,or%2020%20or%20100%20people>

²⁵ Ramadas Narayanan, Prajapati Parthkumar, Roberto Pippia, Solar energy utilisation in Australian homes: A case study, Case Studies in Thermal Engineering (2021) – accessed May 23 2024
<https://www.sciencedirect.com/science/article/pii/S2214157X21007668>