

Appendix 7 – Public Benefit of the SSD Application

Introduction

This Appendix provides an overview of the current levels of social and affordable housing within the City of Sydney LGA, demonstrating a genuine need for social and affordable housing. The proposal provides a genuine public benefit identified by the City of Sydney and is consistent with the objects of the Environmental Planning and Assessment Act 1979 namely by providing an affordable and social housing development.

The revised proposal provides for a much needed affordable and social housing project, which on balance provides broad public benefits that far outweigh the relatively minor departures from some planning controls. We argue that strict compliance with the Apartment Design Guide (ADG) and Precinct SEPP is unnecessary because a high level of amenity will be provided as demonstrated in the accompanying RTS.

Strict compliance with the ADG and the Precinct SEPP will directly impact the number of units able to be provided for those in need, ultimately leading to an overall disbenefit for the broader community.

New Social and affordable housing opportunities are limited in the City of Sydney LGA

SGCH advise that more people are experiencing rental stress. People earning very low to moderate incomes are increasingly unable to access affordable rental housing. In 2015-16, the Australian Bureau of Statistics (ABS) reported that just over half (51%) of lower income renter households in NSW were in rental stress because they paid more than 30% of their income on housing costs.

SGCH advise their experience is that this situation is unsustainable with renters ending up in emergency housing or on the street.

The SSD Application represents an identified public benefit needed in the City of Sydney LGA

The SSD Application seeks to provide people in need of housing with well-designed new social and affordable housing. This housing is known to be in demand in the Redfern and Waterloo precincts.

As at 30 June 2018 the NSW Department of Family and Community Services dashboard reported there were 48,337 applicants for social housing, of which 4,595 were identified as being in urgent need of housing. Within the Inner City zone where this site is located, there were 980 reported applicants, of which 437 were identified as in urgent need of housing. The wait times for all unit types (studios, 1-4 beds) within the Inner City zone are between 5-10 years.

Despite this growing waitlist, data from the City of Sydney's Housing Audits in 2017/2018 (**Table 1**) show a slow growth in the number of social and affordable rental housing units across the LGA since 2007. During the 2017/18 financial year, there was a net decrease (110 dwellings) in the total number of social (including public) housing dwellings.

A net increase of 19 affordable rental housing dwellings in the Glebe Point Road village was recorded. There is a demonstrated need for more affordable housing in the City of Sydney's LGA as detailed above and further detailed in Table 1.

Year	Social housing dwellings	Affordable rental housing dwellings
2007 (Baseline)	9,397	447
2017	9,561	835
2018	9,451	854
Nett growth since 2007	54	407
Units delivered by this proposal	Up to 50	110 (including 2 dual key units)
Increase on recorded growth between 2007-2018 as a result of this proposal	93%	27%

Table 1: Social and affordable housing units in City of Sydney LGA since 2007 (Source: SGCH)

Justification for current design to ensure optimum number of new social and affordable units

The need for new social and affordable units within Redfern is acknowledged by the sale of the subject site by the City of Sydney Council to SGCH for the purpose of affordable housing.

If approved, this development would provide 160 additional new social and affordable dwellings and significantly increase the numbers of this type of residential accommodation in the LGA by early 2021 upon completion of the project. Up to 50 of these dwellings will be social housing with the remainder providing affordable rental opportunities.

This SSD Application will support the aims and objectives of the **Greater Sydney Region Plan 'Metropolis of Three Cities'** (GSRP) which states:

...the delivery of social housing needs to be accelerated to cope with the growing waiting list and at the same time, more affordable rental dwellings are needed as a stepping stone for people in social housing who are capable of entering the private rental market, thereby freeing up housing for those most in need...

This SSD Application will also contribute to the City of Sydney's targets for social and affordable housing. We consider it relevant to note that the development exceeds the Affordable Rental Housing Targets of the GSRP of 5-10%.

The development will provide for 100% of the units for affordable housing. The affordable housing in this development will also be retained in perpetuity, which will exceed the provisions of the *State Environmental Planning Policy (Affordable Rental Housing) 2009* to retain units for a period of 10 years.

A high level of residential amenity will be achieved

The proposal seeks to maximise the public benefit of this development by providing as many well-designed units for affordable housing within the existing floor space and height restrictions for the site.

The supporting architectural plans and the accompanying ADG compliance table prepared by DKO (provided in **Appendix 2**) demonstrate the proposal generally achieves the relevant design criteria. The proposal provides for a high level of residential amenity including:

- adequate solar access for a site within a dense urban area;
- adequate visual privacy through the provision of siting of windows and balconies and the placement of screening;
- quality communal open spaces with solar access providing residents with spaces to socialise;
- well designed apartments to suit a range of housing needs, many with City views and regional outlooks; and
- a purpose built development within close proximity to public transport and services.

Strict compliance will directly impact expected number of affordable units within the City of Sydney's LGA

Strict compliance with the ADG setbacks is unnecessary and would reduce the number of units provided on the site and therefore the number of people on low to very low incomes being placed in suitable housing. We refer to the Department of Planning and Environment's planning circular (PS 17-001) which provides clear guidance on the application of the ADG states that

...the ADG is not intended to be, and should not be applied as, a set of strict development standards...

Based on DKO's assumptions, a development within the maximum building envelopes would result in approximately 110 units. **This would result in net loss of 50 units from the proposed scheme and would likely result in the development not being constructed.** This would result in the opportunity for the provision of much needed social and affordable housing units not being achieved within the City of Sydney LGA.

As demonstrated through the RTS documentation we argue that strict compliance with the ADG setbacks is not necessary because:

- the ADG is not intended to be, and should not be applied as, a set of strict development standards
- the environmental impacts are acceptable, and a high level of residential amenity is achieved.

In this regard we refer to the RTS and **Appendices 2, 4, 7, 8 and 9**

We argue that the provision of 160 social and affordable housing units outweighs the need for strict compliance with the numerical setback requirements of the ADG in this instance and should be supported as amended.