



## *Redfern Place*

**(600 – 660 Elizabeth Street, Redfern)**

**Proposal made by Bridge Housing to the NSW  
Department of Planning, Housing and Infrastructure  
(DPHI)  
State Significant Development Application**

## **SHELTER NSW SUBMISSION**

4 December 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.

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 are especially concerned for low-income households which struggle to afford good-quality and well-located housing in the private market. We consider a sustainable housing system one that delivers what we call Triple-A housing and Triple-P outcomes.

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|--------------------------------------|---|--|
| <b>Affordable and diverse homes</b>  | <b>Accessible, well-located housing</b> | <b>Appropriate, high-quality development</b> |
| Housing supply and demand            | Proximity to jobs and services          | Amenity and aesthetics                       |
| Tenure forms and rights              | Access to public transport              | Energy and environment                       |
| Housing types and sizes              | Accessibility and adaptability          | Standards and maintenance                    |
| <b>Productive cities and regions</b> | <b>Poverty-free communities</b>         | <b>Protected neighbourhoods</b>              |
| Access to jobs and services          | Housing stress and homelessness         | Energy use and consumption                   |
| Housing costs and consumption        | Physical and mental health              | Urban heat                                   |
| Financial and economic stability     | Education access and attainment         | Climate resilience and adaptation            |

We have an established interest in the development of social and affordable housing, including policies and practice around public housing estate renewal and associated property development. We have also been involved in the *Groundswell* coalition. *Groundswell* comprises a number of local community organisations from the Redfern and Waterloo area including REDwatch, Inner Sydney Voice and the Tenants’ Union of NSW. It acts as a point of liaison between NSW Government agencies and community members regarding the development in the Redfern-Eveleigh-Waterloo area.

Shelter NSW thanks the Department of Planning, Housing and Infrastructure (DPHI) for the opportunity to comment on this landmark project.

## Background to the proposal

**Shelter NSW welcomes and supports this current proposal being made by Homes NSW in partnership with Bridge Housing to deliver around 350 new social<sup>1</sup>, affordable and specialist disability support homes on the 600-660 Elizabeth Street, Redfern site (to be known as *Redfern Place*).** The site will also include a community hub, a new commercial office and a large new community facility for the Redfern local community to replace the existing ageing PCYC facility.

At the top level this proposal provides significantly more public benefit than previously proposed for the site and is worthy of the descriptor 'landmark' (given the history of public housing estate renewal projects).

Shelter NSW first made formal comment on the plans for this piece of public land, long used for public housing, in 2021<sup>2</sup> when we commented on the City of Sydney's Planning Proposal for 600-660 Elizabeth Street Redfern as proposed by the NSW Government Land and Housing Corporation (LAHC)). The proposal at that time sat under the then Government's broader *Communities Plus* program. According to the City of Sydney at that time, the proposed changes would have permitted the redevelopment of the site for new market, affordable rental and social housing (around 300 dwellings) in 4 buildings, 4 to 16 stories in height. The proposed changes were to also allow for a new 3,500 square metre community facility.

Shelter NSW understood at the time that the City of Sydney originally proposed that the development include at least 30% of total residential floor area for social housing and 10% of total residential floor area for affordable rental housing; but that was subsequently reduced by the NSW Government to require at least 30% of total residential floor area to be used for the purposes of a mix of social housing and affordable housing. As always, we advocated for the for the maximisation of social and affordable housing, especially on public land; and went onto challenge the 'bundling' of the social and affordable dwellings to meet what had become its typical 'social' requirement under the Communities Plus model (70:30 private:social). Over a period of many months, we campaigned<sup>34</sup> for a better public outcome.

Beyond the maximisation of social and affordable housing on the site (and the retention of public land), we also called for the project to:

- **utilise universal design principles in the development** catering for a full range of disabilities (not just physical) including for example, cognitive impairments like dementia which currently affects three in ten Australians aged over 85 years and one

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<sup>1</sup> Noting that the site was originally home to 18 public housing dwellings, demolished in 2013. Source: Homes NSW (Bridge Housing) – Environmental Impact Statement (ESI) Redfern Place 600-660 Elizabeth Street Redfern SSD 512749373- Exec Summary access 4/12/24 [getContent](#)

<sup>2</sup> Shelter NSW Submission, 20 July 2021 to the City of Sydney on the proposal by the (then) NSW Government (Land and Housing Corporation) - access [Shelter-NSW-Submission-Elizabeth-St-Redfern.pdf](#)

<sup>3</sup> Shelter NSW 11 November 2021 [Sydney. What kind of city do we want? - Shelter NSW](#)

<sup>4</sup> Shelter NSW 9 April 2022 [600 Elizabeth St Redfern - Not too late to get this right - Shelter NSW](#)

in ten aged over 65<sup>20</sup>

- **require strengthened energy and environmental standards, NatHERS<sup>21</sup> for example** (beyond minimum standards) of energy efficiency, to ensure new dwellings are of good quality, environmentally sustainable and lower cost for owners and tenants.
- **ensure that affordable renewable energy is accessible to all tenants** across the site – delivering low-cost energy to tenants and potentially supporting the development of a precinct-based Clean Energy Hub.
- **actively engage local residents in the design and specification of the new community facility** so that it will become a useful and flexible space for a diverse range of groups within the local area.

## Scope and approach of our submission

Given our overall and general support for this proposal our comments will be by exception, offered as a general observations and advice with two exceptions regarding some key elements of the building and apartment design and accessibility requirements.

In this submission we will:

- briefly recap on the key recommendations we made in our 2021 submission as they have ongoing relevance
- provide general commentary about the need for careful planning for a mixed, low-income community living in mid-high rise
- provide some specific recommendation and observations about this proposal with specific recommendations to:
  - review the building layout that will see apartments opening onto long corridors creating the high potential for reduced visual and acoustic privacy for residents.
  - increase the accessibility requirements to all social and affordable housing to be built to the liveable Housing Guideline Gold level<sup>5</sup>.

## General observations about Redfern Place

### Affordable Rental Housing – in addition to social housing

At Shelter NSW, we advocate for Affordable Rental Housing - in addition to social housing, not instead of it. 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 and essential workers some of whom earn low-moderate and/or insecure wages. Redfern Place is well-located to key transport, employment and services – all of which is very convenient for lower-income

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<sup>5</sup> EIS at p5

workers. Unless reasonably priced housing is secured for them however, they will be displaced.

We offer the short paper developed for Shelter NSW and its recommendations for ensuring that even within an affordable housing cohort, that a mix of households be offered tenancies (income, households size)<sup>6</sup>.

## Supporting low-income people (including families) living in medium-high density

**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 home at the future Redfern Place as one that may be a home to a whole variety of people over the space of decades. This is especially relevant for people in very-low, low income households across all tenure types, who (in reality) tend to be more vulnerable in highly dense built environments

**High-rise living is now a feature of Sydney's inner city.** 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"*<sup>7 8</sup> This is especially acute for those experiencing the compounding challenges associated with poor mental or physical health; loneliness and isolation. We call on the NSW Government and its delivery partners to be mindful of this, **ensuring that the growing and changing Redfern is a place where large numbers of vulnerable people and lower-income people in general can happily and healthily live whether they be in social, affordable or private housing.**

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.

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.

Shelter NSW also encourages careful consideration of the needs of various cohorts who will make Redfern Place home. Beyond consideration of the growing cohorts of aging residents we suggest a whole-of- life-cycle view which includes **supporting babies, children and**

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<sup>6</sup> Gilbert,C & Zanardo, M. (2023) *What an Inclusionary Housing Policy Should Be*, prepared for Shelter NSW: [Shelter-report-FINAL-18-January-2024.pdf](#)

<sup>7</sup> Easthope,H., Troy,L. & Crommelin,L. (2017) *It's not just the buildings, high-density neighbourhoods make life worse for the poor* ([theconversation.com](#)) article in The Conversation published 22 August, 2017 accessed 28/4/22

<sup>8</sup> 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

**young people to grow in place** (supplementing the important commitment to support older people to Age in Place).

We note the inclusion of a range of dwellings sizes from studios, through to 3 bedroom dwellings (though note that the latter will be a quite small proportion of the overall dwelling mix).

We commend the insights and recommendations provided by the Western Sydney Local Health Districts about supporting healthy and happy lives for children and families living in high-rise<sup>9</sup>

## Ensuring design excellence at Redfern Place

Shelter NSW recognises the ambition for the Redfern Place development to be *beautiful, tenure-blind, inclusive and connected showcasing a collection of architectural forms which provide identity without priority*. We also agree that the new community *will benefit from the site's location and its rich history and cultural connections opposite Redfern Oval and within Redfern more broadly*.<sup>10</sup>

We note and support the design principles set out for the project

### 4.3 Design Principles

The following design principles have been adopted in the design of the proposal to ensure the overall vision and objectives for the site are achieved:

- **Connect to Country** – Respond to the values and insights of traditional knowledge holders and realising them in built form to create a place for community that becomes integral to Redfern.
- **Affordable and Sustainable** – Design that delivers an affordable construction, low maintenance and operational solution fit for the planet, occupants and users of the site.
- **Tenure Blind** – Create a tenure blind community of communities which achieves equity in placemaking, amenity, quality and social value and a community centre for wider neighbourhood.
- **Connected and Friendly** – Create opportunities for friendly and active edges within and around the precinct, allowing for moments to dwell and connect with neighbours and passers-by. Enhance safety and comfort through passive surveillance and enhance porosity, both visual and physical.
- **Uniting Ground Plane** – A public realm that connects the precinct and extends to the ground level of each building to provide a connected ground plane. Create visible spaces beneath a densely vegetated resident-focused urban oasis, interconnecting with neighbouring landscapes. This subtly but clearly signifies the difference between communal spaces and publicly accessible links and parks.
- **Diverse and Cohesive Village** – A variety of architectural expressions brings a richness to each building whilst common materials and alignments let them be read as a family.

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<sup>9</sup> Centre for Population Health - Western Sydney Local Health District [Healthy Higher Density Living for Families with Children](#) accessed 4/12/24

<sup>10</sup> Redfern Place EIS at p28

We understand <sup>11</sup> that there were a number of stages to ensure that the proposed design would be excellent' in terms of the needs of future residents. This included a Competitive Design Alternatives Process and Expression of Interest Process, a Design Review Panel (DRP) for the Elizabeth Street site.

**Notwithstanding this, Shelter NSW has sought some independent advice as to the high level design features of the residential dwellings and would like to raise a concern.**

We understand that apartments come off long corridors with windows of individual units opening up onto the corridors. This we understand, creates a 'motel effect' which tends to reduce visual and auditory privacy; so much so that residents would tend to keep the windows closed to either protect their own privacy or block noise from neighbours and/or people travelling in the corridor. This then has a detrimental effect on airflow across dwellings. It can also lead tension within tenant communities and, ultimately challenges for building managers

**Shelter NSW recommends that this key feature building design feature be reviewed entirely.**

## Maximising the environmental and energy performance of Redfern Place: precinct, buildings and homes

Across the general community there is a deepening realisation of the cost of living with rising temperatures and energy-inefficient homes and appliances; a challenge disproportionately felt by lower income households. These households have the least financial ability to adapt and respond <sup>12</sup> and spend a disproportionately large part of their disposable income on energy costs (6.4% versus 1.2%).<sup>13</sup> 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 <sup>14</sup> Whether as private or social/affordable housing renters or low-income homeowners, these households often have little control over the energy efficiency of their homes and little financial capacity to upgrade old, inefficient appliances such as water and space heating/cooling systems.

The future residential population of Redfern Place will rely on well-built, designed and maintained buildings and dwellings in order to mitigate the impacts of climate change and rising energy costs.

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<sup>11</sup> Homes NSW (Bridge Housing) – Environmental Impact Statement (ESI) at p12 accessed 4/12/24 [getContent](#)

<sup>12</sup> Deloitte (2021), *The economic impacts of the National Low-Income Energy Productivity Program*, report prepared for the Australian Council of Social Service [Link to report accessed 27 Jan 2022](#)

<sup>13</sup> Australian Energy Regulator 2019, *Affordability in retail energy market*, Commonwealth of Australia, Canberra.

<sup>14</sup> Grey, C.N.B. et al 2017, 'Cold homes, fuel poverty and energy efficiency improvements: A longitudinal focus group approach, *Indoor and Built Environment*, vol. 26, iss.7, pp.902-913. doi:[10.1177/1420326X17703450](https://doi.org/10.1177/1420326X17703450)

We note and welcome that the proposal has been designed to achieve a minimum 5 Star Green Star Buildings rating for each building, NABERS Energy 5.5 Star and NABERS Water 4.5 Star rating for commercial office space.<sup>15</sup>

## Supporting health and wellbeing

Shelter NSW notes and commends the specific inclusion of Specialist Disability Accommodation (SDA) (including accommodation for a carer). Beyond the obvious benefit that will be offered to residents, these dwellings will provide an opportunity for other (future) tenants in social/affordable housing requiring a higher level of disability support to potentially remain in the Redfern Place community.

Shelter NSW often notes<sup>16</sup> 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 the meantime, the NSW Government should demand a generally higher standard across all of its sites including at Redfern Place.

We note that the homes at Redfern Place are proposed to all built to be Silver Liveable Standard and 15% built to Gold Liveable Standard and AS4299 Adaptable Housing<sup>17</sup>.

Consistent with our advocacy on other government-led projects we are calling for the following at Redfern Place: **100% of social and affordable dwellings be delivered to the liveable Housing Guideline Gold level**

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<sup>15</sup> EIS p61 *Ecologically Sustainable Development (ESD) Report*

<sup>16</sup> 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://sheltersnsw.org.au/8_4-Shelter-NSW-Riverwood-Estate-Masterplan-Rezoning-Proposal-April-2024.pdf)

<sup>17</sup> EIS at p5