



Cameron Sargent
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Key Sites Assessments
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Your ref: SSD-14378717

12th November 2021

Dear Cameron,

Re: Telopea Concept Plan and Stage 1A

Thank you for your letter of 13th October, regarding the above-named State Significant Development (SSD) application. I apologise for the late response.

The DPIE social impact assessment (SIA) team has carefully reviewed the SIA report for this proposal, noting that it applies to the concept proposal and Stage 1A only. We have provided some comments and recommendations in the table following.

We would be happy to provide further support if requested, including advice for conditions of consent, following any revision/supplement to the SIA in the light of our recommendations and other submissions.

Yours sincerely,

Dr Richard Parsons
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Teloepa Estate Concept Plan and Stage 1A Redevelopment - Review of social impact assessment

Prepared by Tanya Martin, reviewed by Dr Richard Parsons, November 2021

Purpose of this review

State significant projects can affect people in many ways, both positively and negatively. Identifying and understanding social impacts helps to inform responses that aim to avoid, mitigate or reduce negative impacts and enhance positive impacts (p.7 SIA Guideline, DPIE 2021). The consent authority is required to consider social impacts in the locality, and to consider the public interest. The public interest includes the object of promoting the social and economic welfare of the community, and of ecologically sustainable development, which requires effective integration of social, economic, and environmental considerations in decision making (*Environmental Planning and Assessment Act 1979 No 203*).

This review evaluates the Social Impact Assessment (SIA) report dated 12 July 2021 for the proposal SSD-14378717, in respect of its consistency with requirements to consider social impacts in the Secretary's Environmental Assessment Requirements (SEARs). For this project the SEARs require the SIA to be undertaken "in accordance with the NSW DPIE (2020) draft Social Impact Assessment Guideline and Technical Supplement."

The SIA report is Appendix R of the EIS, and was prepared by Urbis Pty Ltd. The SIA was written by Isabelle Kikirekov and Rachel Trigg, with assistance from Eliza Cook.

This review considers both the adequacy of the SIA from a methodological (process) point of view, and, where possible, the merits of the predicted social impacts. It also suggests some opportunities for enhancing social benefits from the project.

Following the Response to Submissions, the SIA Specialist Team may provide further recommendations and advice for consent conditions.

The Project

The Teloepa Estate Concept Plan and Stage 1A (CPA) forms part of the Teloepa Precinct Master Plan which was prepared by NSW Land and Housing Corporation (LAHC) and Parramatta City to facilitate the rezoning of the precinct. The Master Plan seeks to revitalise the Teloepa Precinct through the redevelopment of LAHC's social housing assets, as well as sites under private ownership, to deliver an integrated community with upgraded public domain and community facilities – and to capitalise on access to the new Parramatta Light Rail network.

The proposed redevelopment of the CPA is part of the NSW Government's Communities Plus program, which seeks to deliver new communities where social housing blends with private and affordable housing with good access to transport, employment, improved community facilities and open space.

In December 2019, the NSW Government announced that the Affinity consortium, comprising Frasers and Hume Community Housing, was awarded the contract to redevelop the Teloepa CPA.

The project represents the first step in the delivery of the planned redevelopment of the Telopea CPA and the Stage 1A works will provide the first integrated social and market housing development on the site, as well as a new arrival plaza for the Parramatta Light Rail.

The Telopea Estate Redevelopment is a staged redevelopment of the site for a mixed-use development, including approximately 4,700 dwellings (mix of social, affordable and market), retail and commercial uses, community facilities, public open space and new roads.

Stage 1A: includes demolition works, bulk earthworks, and construction of residential flat buildings up to ten storeys in height containing a total of 452 apartments on Lot C9, a new public park, a new road crossing over the light rail corridor and a new plaza adjacent to Telopea Station.

Review comments

The SIA in its current form is inadequate. It is incomplete in engaging affected people and in identifying some likely social impacts (positive and negative) and associated mitigation and enhancement measures for the people who will experience the change. The table below provides detailed comments and recommendations.

comment	recommendation
<p>1. Methodology – Engagement and impact identification</p> <p>In section 1.4 Methodology (p.6) of the SIA, the proponent states that during the scoping phase they reviewed previous consultation outcomes; and consulted with the City of Parramatta to identify potential impacts.</p> <p>Note that p.28 of the SIA Guideline outlines the aims of engagement for SIA specifically, i.e. that respectful, inclusive, and meaningful engagement should provide “first-hand insights into what people value and how they expect a project to affect them.”</p> <p>There appears to have been no engagement for the SIA with the following groups:</p> <ul style="list-style-type: none">the current public housing tenants to understand their values and needs; and the impacts, potential mitigations and enhancement measures associated with relocation both away from the estate and then potentially back onto the redeveloped estate;the local Aboriginal community to understand from their perspectives the cultural values and impacts;the tenants of the existing social housing in the area to be redeveloped to understand from their perspectives the impacts, potential mitigations and enhancement measures of the redevelopment;	<p>Undertake further engagement with relevant people and groups as per the requirements of DPIE’s SIA guideline.</p> <p>When designing the engagement methodology, please refer to the provisions in Appendix A of the guideline, to ensure that engagement methods:</p> <ul style="list-style-type: none">are tailored to the needs of the people being engaged, anddraw on a variety of levels of participation, as per the IAP2 spectrum.

- the private dwelling owners and residents of Telopea to understand from their perspectives the impacts, potential mitigations and enhancement measures of the redevelopment;
- the business owners of Telopea to understand from their perspectives the impacts, potential mitigations and enhancement measures of the redevelopment;
- the residents and businesses along Kissing Point Rd as there may be an increase in traffic deriving from construction and a significant increase in population.

There is also a lack of information in the SIA as to the number of people being displaced; the type of housing that they are going to and from – i.e. is it 'like-for-like' but modernised?

2. Methodology – Impact identification

The impacts and associated mitigation measures identified do not appear to be comprehensive, given the limitations of the stakeholder engagement. Following are some example potential impacts that should be considered and assessed for this type of project:

- Impacts on **amenity and community safety** – including reasonable concerns about these impacts – deriving from traffic and construction activities for local residents living near the proposed construction site. Particular attention is needed to identify potential impacts on any vulnerable people.
- Impacts on “**intangible**” **cultural or spiritual values** associated with the locality (not just the site) for local Aboriginal people resulting from changes to landscape and surroundings.
- Impacts on **sense of place, community character, and community cohesion/division** for residents deriving from the significant proposed change in the community make-up, which could potentially be affecting their health and wellbeing.
- Impacts on **service accessibility** (affordability and availability) for tenants of social housing and other residents deriving from the significant population increase to the suburb e.g. medical services, childcare, car parking.
- Impacts on **surroundings** for local residents deriving from loss of access and environmental aesthetics during construction.

Please update the SIA with any additional impacts, enhancements and mitigation measures. The SIA should consider the impact areas (a) to (i) listed here, at a minimum, and as informed by engagement as explained in comment 1. If any of these impacts are not predicted to be significant, please provide supporting evidence.

Note that the **Technical Supplement** (p.41) provides a useful example of likely social impacts that should be considered for this development type. DPIE would expect to see these issues carefully considered and assessed.

Appendix C of the SIA Guideline provides review questions which the proponent should use to confirm that the requirements of the SIA Guideline have been fulfilled when considering the scale of social impacts of the project. DPIE will also refer to these questions in undertaking its assessment of the project.

- (f) Impacts on **community safety and security**, especially for women and migrants – including reasonable concerns about these impacts.
- (g) Impacts to **decision-making systems** for tenants of public housing deriving from their inability to make decisions that affect their lives and have access to complaint, remedy and grievance mechanisms.
- (h) Impacts to **way of life** for tenants of public housing deriving from reasonable fears of the unknown and for the future.
- (i) Impacts to use of **infrastructure**, and to **health, safety and wellbeing** for tenants of public housing and other residents deriving from reasonable fears that their future homes may have building defects that pose significant risk to residents' health, safety, and wellbeing, particularly in the absence of occupancy certificates for the potential future social housing.

There is also limited information in the SIA relating to the transition of tenants from NSW Department of Communities to Hume Community Housing. What will change for the tenants? How will these changes affect them? What programs does Hume Community Housing provide (if any) to address the social impacts, in particular community cohesion? How does Hume Community Housing monitor these social outcomes?

While this SIA is of the Concept Plan and Stage 1A, the cumulative impacts of construction will be ongoing. There is no information in the SIA about the different stages and how each of these activities may impact people differently.

3. History of locality

The SIA report briefly describes the site context, but provides no historical context. In particular, there is no acknowledgement of First Nations occupation or use of the area, or of cultural values associated with the site, nor is there any information pertaining to the cultural significance of the locality for the tenants of the public housing.

On p.17 of the SIA it is reported that 1.2% of the population of Telopea identified as Aboriginal or Torres Strait Islander which was higher than Parramatta LGA (0.7%).

While an SIA is not expected to consider Aboriginal cultural heritage in terms of archaeological artefacts or human remains, it should analyse the cultural significance

Please analyse the cultural significance of the site and locality for Aboriginal people and for the public housing tenants. This analysis should contribute to an assessment of how the proposed project may be experienced by the community.

As an enhancement and/or mitigation measure, please consider how place-making activities and/or public art can address cultural values.

<p>of the locality, including any cultural values associated with the site.</p>	
<p>4. Design aspects for equity</p> <p>The SIA does not include any information on the specific needs of the future social housing tenants. However, it is commonly reported that:</p> <ul style="list-style-type: none"> • An increasing number of social housing tenants have fled domestic violence and/or war. • Often social housing tenants have mental health problems, and increasingly are overwhelmed by sensory overload. • Social housing tenants generally only relocate when they have to, so designing homes that cater for all people is essential. • Social housing tenants commonly live on a statutory income. • Social housing providers strive to minimise all operational costs and thus tend to minimise maintenance. <p>The Liveable Housing Guidelines have been adopted in most states of Australia for the design and construction of public/social housing. (https://liveablehousingaustralia.org.au)</p> <p>Similarly, Universal Design Principles have been adopted in most states of Australia for the design and construction of public buildings. To minimise cost all apartments and common areas (including playgrounds) should be designed for everyone. This is called universal design. This makes it easier for everyone to access and participate without needing more changes or specialised design in the building, often at significant cost.</p> <p>When we design for all, we make it easier for everyone, but especially people with disability. Some of us might not have a permanent disability, but we are all likely to experience some kind of temporary disability in our lifetime (for example, an injury such as a broken leg). The Principles of Universal Design are:</p> <ul style="list-style-type: none"> • Equitable use - The building and shared areas such as playgrounds, gardens, etc are usable by anyone. It does not disadvantage, stigmatise or privilege any group of users. • Flexibility in use - The building accommodates not only a wide range of individual user preferences but also users' varying functional abilities. • Simple and intuitive - How to use the building/process is easy to understand regardless of the user's experience, knowledge, language skills or concentration level. • Perceptible information - The building/process communicates all necessary information effectively 	<p>Please incorporate universal design principles into the development and design, in accordance with the Liveable Housing Australia Gold Standard.</p>

<p>to all users regardless of ambient conditions or the users' varying intellectual or sensory abilities.</p> <ul style="list-style-type: none"> • Tolerance for error - The building/ process minimises hazards and adverse consequences of accidental or unintended actions by all users. • Low physical effort - Everyone can use the building/process efficiently, comfortably and with minimal fatigue. • Size and space appropriate for use - Appropriate size and space is provided for approach, reach, manipulation, and use regardless of user's body size, posture, or mobility. 	
<p>5. Broader social benefits</p> <p>The development of this site provides opportunity to incorporate a range of other social benefit initiatives.</p> <p>Many people who reside in public or social housing are long-term unemployed. The redevelopment of the Telopea Estate could create social enhancement opportunities during construction, in particular relating to livelihoods. An example includes the Victorian Public Tenant Employment Program which requires developers in the renewal of public/social housing to employ and support training of long-term unemployed tenants for the life of the contract. Social enhancement opportunities such as this are not identified and discussed in the SIA.</p> <p>When constructed, there is further opportunity in the form of rooms available for resident or tenant use. This may include cross-cultural learning and prayer/quiet rooms. Broader social benefits may also include place-making activities.</p> <p>Through broader community and stakeholder engagement that includes public housing tenants and other residents of the locality, the social needs and aspirations of the broader community could be identified and potential initiatives evaluated for inclusion in the development.</p>	<p>Please identify further opportunities to deliver social benefits to the broader community through the development, informed by community and stakeholder engagement.</p>
<p>6. Cumulative social impacts</p> <p>It is standard SIA practice to consider cumulative dimensions of social impacts. Although assessment of cumulative social impacts is inherently complex and carries many uncertainties, it is needed to help manage impacts in an integrated manner.</p> <p>The DPIE (2021) Cumulative Impact Assessment Guidelines for State Significant Projects notes that cumulative impacts "can be caused by the compounding effects of a single project or multiple projects in an area,</p>	<p>Please assess the cumulative ways in which people are likely to experience social impacts, and propose responses that address impacts at the cumulative level (e.g. coordinating responses and adaptive management.)</p>

<p>and by the accumulation of effects from past, current and future activities as they arise” (p.4).</p> <p>The SIA does not identify any cumulative social impacts. The Telopea redevelopment is a multi-stage project. Some residents will live through each stage of the redevelopment; others will live through parts of it. The livelihoods of some business owners and their workers will be affected by the redevelopment.</p>	
<p>7. Management Measures</p> <p>Social impact responses should be tangible, durably effective, deliverable by the proponent and directly related to the impacts identified (p.35 of the SIA Guideline). Currently, many of the management measures and recommendations in the SIA are not commitments and simply provide tentative options for consideration. There is no guarantee that any of these recommendations will be implemented, unless they are converted into firm commitments.</p>	<p>Please review and update the SIA with management measures that are tangible, durably effective, deliverable by the proponent, and directly related to the impacts identified.</p> <p>The Technical Supplement (Section 3) provides guidance on responding to impacts, and DPIE would expect to see these provisions carefully considered.</p>
<p>8. Social Impact Management Plan</p> <p>The SIA Guideline 2021 (DPIE) recommends the generation of a provisional Social Impact Management Plan (SIMP) as part of the SIA, to be finalised post-approval.</p> <p>A SIMP is a summary management plan detailing proposed management and monitoring activities. The SIMP guides the management of the social impacts, prior to and during construction, and for at least 12 months following the commencement of operation. It is generated during the planning phase and then generally passed to a contractor to implement. This ensures that identified impacts are adaptively managed and monitored, and commitments met.</p>	<p>Section 9.1 (p.47) of the SIA provides a suite of recommendations. These should be expanded and enhanced to form a preliminary SIMP.</p> <p>Within the preliminary SIMP, please provide the following at a minimum:</p> <ul style="list-style-type: none"> • summary table of impacts, mitigations, commitments and desired outcomes in social terms, including targets where appropriate; • adaptive measures if the target is not met; • what will be monitored; • how and when data will be collected; • who is primarily responsible for monitoring; • how incidents and grievances will be recorded, reported, and responded to; • how community and other stakeholders can participate in monitoring if they wish; and • public reporting arrangements.
<p>9. Social Mix and Distributive Equity</p> <p>The redevelopment project when complete will provide 4700 dwellings (p.8) of which 256 will be affordable housing dwellings (p.23) and 486 social housing dwellings</p>	<p>As development contracts have already been negotiated and signed, no formal recommendation is suggested at this stage.</p>

(p.27). This equates to 15.7% being social and affordable dwelling and 84.3% being market dwellings. This ratio of social and affordable housing to market housing is lower than the 30/70 recommendation in the current NSW Future Directions for Social Housing policy.

The SIA reports (p.13) that there is currently a shortage of social housing in the Parramatta/Baulkham Hills allocation zone where Telopea is located, with 2,097 people currently on the waiting list.

While it is recognised that development contracts have already been negotiated and signed, it is important to note that the present proposal appears to deliver private benefit at the expense of social benefit, contravening the principle of distributive equity (p.10 of the SIA guideline). Of relevance is the likely effect of a proposal on the distribution of impacts and benefits, and the risk that it will exacerbate social inequalities.

Future stage proposals should aim to achieve the goal of at least 30% social and affordable housing, as per the NSW Future Directions for Social Housing policy.