



nsw Federation of  
Housing Associations inc

## **Harold Park redevelopment, Forest Lodge** **Affordable and seniors housing component**

A Submission to City of Sydney Council by the NSW Federation of  
Housing Associations

3<sup>rd</sup> November, 2011



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## 1. Executive Summary

The NSW Federation of Housing Associations ('the Federation') firmly supports the provision of affordable housing, targeted at the lowest two quintiles of household income, at Harold Park and welcomes the opportunity to participate in the consultation process.

This submission to council is in response to the *Statement of Environmental Effects* (July 2011) submitted by JBA Planning on behalf of Mirvac Projects Pty Limited as part of Stage 1 of the Development Application (DA) process. Reference is also made to Appendix A, *Architectural Drawings*, by HASSELL and Appendix N, *Sustainability Report*, prepared by Aecom.

Our submission comprises comments regarding the proposed affordable housing on the Harold Park site following consultation with the Federation's community housing association members. A list of housing associations that provided feedback to this submission can be found in the appendix on page 8.

This submission will address the following points: proximity of the proposed affordable housing site to major roads which may impact the quiet enjoyment of tenants, particularly seniors; the size of the proposed site in the context of the affordable and seniors housing target and the apparent allowable building heights; the definition of 'key worker'; and the proposed staging of the construction of the affordable and seniors housing component of the development.

## 2. The NSW Federation of Housing Associations

The NSW Federation of Housing Associations is the industry peak body for housing associations in NSW.

Housing associations are not-for-profit community housing providers whose principal business is managing and developing long term housing for low and moderate income households.

There are some 29 housing associations in NSW, all of which are members of the Federation. Housing associations manage an estimated 29,000 properties in NSW. This is currently 20% of social and affordable housing in NSW.

The Federation provides a range of services to support the development and performance of housing associations and the wider social housing system. One way in which we do this is through representation and sector co-ordination. This is our fundamental role as the peak industry body for housing associations in NSW. We provide a voice for members, and enable them to work together as a mutually supportive sector and to articulate and pursue their common aspirations. It is in this spirit that we are engaging in the Harold Park redevelopment consultation process.

### 3. The Federation's Submission

#### 3.1 BACKGROUND

The need for affordable housing in Sydney is well established. According to State Government figures, 47,710 households are in housing stress in inner Sydney alone.<sup>1</sup> The land available for development in the inner city is diminishing. Harold Park represents a significant area of land in the inner city suburb of Forest Lodge on which to build a genuinely mixed development comprising accommodation accessible to all including those in the lowest two income quintiles. The Federation expresses the importance of the increased supply of secure, long term affordable housing for essential workers in close proximity to the centre of Sydney.

#### 3.2 SITE SELECTION AND APPROPRIATENESS FOR AFFORDABLE HOUSING

The Harold Park redevelopment site provides significant amenity. Its location in Glebe is suitable for essential workers and seniors due to its proximity to services in both Annandale and Glebe, a large hospital, and transport links to the city. We firmly support the provision of affordable housing at the Harold Park site.

The parcel of land proposed for the affordable housing development on Harold Park is situated on the corner of Wigram Road and The Crescent (Precinct 6). This is likely to be the noisiest corner of the Harold Park site. Since seniors housing will be included in the development, we believe that the location on the site for the affordable housing component is not entirely appropriate.

Further concerns about the appropriateness of affordable housing on Precinct 6 relate to its size, and whether the proposed GFA is achievable within the constrictions of the relevant planning controls. The Executive Summary of the *Statement of Environmental Effects* (pV) states that the Harold Park site will deliver “up to 5,500m<sup>2</sup> GFA of affordable and seniors housing.” The housing would range in size from 50m<sup>2</sup> to 155m<sup>2</sup>. At an average of 110m<sup>2</sup> per unit, this equates to 50 affordable housing units. The *Sustainability Report* (Appendix N, p24)

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<sup>1</sup> “Housing affordability is an issue for all of Sydney.” NSW Government | Planning, Metropolitan Strategy Review: Sydney Towards 2036, “Meeting Changing Housing Needs”, 2010, p 21

states that the affordable and seniors housing will be built on a parcel of land of size 1,000m<sup>2</sup> dedicated by the developer to the City of Sydney at no cost. The affordable and seniors housing is therefore proposed at a floor-space-ratio (FSR) of 5.5:1.

The Federation reflects the concern of its members that the FSR of 5.5:1 is unachievable. Appendix A, *Architectural Drawings* (DA-MP-008 Building Levels Plan), shows the buildings on Precinct 6 to be three, four and five storeys in height. This appears to be at odds with the proposed FSR. Our request is that the developer prepares a concept plan for the 1,000m<sup>2</sup> parcel of land on Precinct 6 that shows that it is possible to fit 50 units of seniors and affordable housing onto the site while complying with the relevant development controls (height limits, parking, deep soil zones, setbacks, overshadowing, building separation, etc). The concept should also be acceptable to stakeholders, including tenants.

While we support the provision of affordable housing on the site, constituting approximately 4-5% of all dwellings, we are dubious that the affordable and seniors housing target can be achieved on the proposed parcel of land. An affordable housing development of similar scale built recently within the City's LGA in Zetland achieved 57 units (a GFA of 4,643m<sup>2</sup>) in an eight storey building on a land area of 1,587m<sup>2</sup>. The common open space requirement for this development, excluding driveways, was 561.5m<sup>2</sup>. We believe that it is therefore reasonable to request that the developer undertake further work before the DA is approved to ensure that the target is achievable on the proposed site.

### **3.3 DEFINITION OF 'KEY WORKER'** (See *Masterplan Sustainability Report*, p24)

The definition of 'key workers' given in the *Aecom Sustainability Report* is made by listing occupation types, such as teachers, police officers, nurses, fire brigade officers, etc, with incomes in a range of \$50k to \$70k.

While we do not seek to determine eligibility criteria in this submission and believe that the community housing provider(s) should be responsible for setting eligibility and allocation criteria, we note that the term 'key worker' should not be taken to be limited to occupations such as police and fire fighters. In Sydney this term includes care workers, taxi drivers, writers, construction workers, actors, bar staff, trades people, nurses, retail shop assistants, couriers,

real estate property workers and finance industry staff.<sup>2</sup> Further, the income range of \$50k to \$70k is too narrow and would better reflect the incomes of essential workers if it were widened to the range \$40k to \$85k.

### **3.4 STAGING OF THE DEVELOPMENT** (See *Statement of Environmental Effects*, pp 29-30)

The affordable housing component of the Harold Park redevelopment is scheduled to be completed in Stage 6, the final stage of the development. Due to the need for affordable and aged housing in the area it would be far better, and constitute less of a risk, for the affordable housing land parcel to be allocated and constructed without delay.

### **3.5 FINAL COMMENTS**

Registered community housing providers have extensive experience in delivering affordable housing through a range of models and in our view they should have a presence at Harold Park.<sup>3</sup> We propose that the Federation be involved by the City of Sydney Council in engaging with affordable housing providers and exploring future options. As the trade association, we have a strong knowledge of the sector.

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<sup>2</sup> See *City West Director's Report* (p 13) for a full list of the organisation's affordable housing tenant occupations by income band.

<sup>3</sup> The Centre for Affordable Housing's *NSW Affordable Housing Guidelines*, July 2010 (p1) states that best-practice management of affordable housing is provided through registered community (not-for-profit) housing providers.

## 4. Appendix

Community housing providers consulted for this submission:

- City West Housing Pty Ltd
- Bridge Housing Ltd

Community housing providers were asked the following questions:

1. Component of affordable housing proposed for the site (refer Statement of Environmental Effects, p25 and Statement of Environmental Effects pV): 5,500m<sup>2</sup> GFA of affordable housing is 5% of total residential GFA (125,353m<sup>2</sup>) of the proposed development. At an average of 110m<sup>2</sup> per unit, this equates to 50 affordable housing units of 1-3 bedrooms. Is this an adequate component for the site, in your opinion, taking into account the site's location and proximity to services?
2. Location of proposed affordable/seniors housing: Is the location of the 6<sup>th</sup> precinct (corner of Wigram Road and The Crescent) appropriate for affordable housing? Are there more suitable parts of the site for the provision of affordable housing? (Note: we could also lobby for the land dedication to be sold on the argument that more affordable housing units could be built elsewhere where land costs were less).
3. Staging of the development (refer Statement of Environmental Effects, pp29-30): the developer proposes that the affordable component, precinct 6, would be completed last, after stages 1-5. Would this impact on the development of the affordable housing? What are the arguments for bringing this stage earlier?
4. Definition of 'key worker' (refer Statement of Environmental Effects, p24): The definition here is quite narrow. Would you widen the definition, or make the definition non-prescriptive? Do you have any supporting documentation on key workers in Sydney?

## 5. References

### Papers

- City West Director's Report, p 13
- NSW Affordable Housing Guidelines, Centre for Affordable Housing, July 2010
- NSW Government | Planning, Metropolitan Strategy Review: Sydney Towards 2036, "Meeting Changing Housing Needs", p 21
- NSW Government's State Plan, 2010
- NSW Government's Metropolitan Strategy, Housing Strategy for Sydney, 2006

### Web

<http://www.metrostrategy.nsw.gov.au/dev/uploads/paper/housing/BACKGROUND-5.html>

(Accessed 18 November 2010)