

**INQUIRY INTO DEVELOPMENT OF THE TRANSPORT
ORIENTED DEVELOPMENT PROGRAM**

Received: 55 responses

Dear Committee Members

Thank you for the opportunity to make a submission to this inquiry into the development of the Transport Oriented Development Program and other matters. I acknowledge that all developments in NSW are occurring on unceded Aboriginal land and that truth telling and recognition should be built into all personal and Government considerations and decisions.

I would like to start by recognising that NSW is facing a housing affordability crisis and that co-locating new housing with existing infrastructure is far preferable to the perpetual urban sprawl at the fringes of communities. However, I am not satisfied that either the Transport Oriented Development State Environment Planning Policy (TOD SEPP) or the changes outlined in the Diverse and Well Located Homes program will effectively deliver well-planned developments, or materially improve housing affordability, without significant changes to enhance the existing minimum standards.

Evidence has shown that building new market housing without a dedicated social or affordable housing component has a negligible impact on meeting the housing needs of low to very low income households. The currently available information on the planning reforms indicates there will be no new public housing required as part of redevelopments and the affordable housing requirements within the TOD SEPP are proportionally far too low as well as being time limited. The lack of specific minimum affordable housing in the Diverse and Well Located Homes Program is doubly concerning. Affordable housing supply as part of redevelopments should be retained in perpetuity and be subject to a rent setting policy that is proportionate to tenant income, and not a discount to market model.

It is clear that we must increase density to meet the housing needs of the community, the vast majority of people accept this. Even areas that will see a large increase in density in accordance with the reforms led by Paul Scully are receptive to these changes, but only if there is a holistic plan for their communities. To gain community confidence and support for wholesale rezoning, the NSW Government must urgently announce their policy that will ensure communities and the environment are protected.

Without a clear set of policies to govern the densification of our communities - councils, residents and the natural environment will become subject to ad hoc developments that are driven by developer interests instead of long-term strategic planning through democratic channels.

The community should know that all increases in density will be supported by adequate infrastructure beyond just transport needs. Planning should be conducted on a strategic, precinct-oriented basis that prioritises the delivery of other essential infrastructure like public and green space, schools, community spaces and healthcare facilities.

All of these critical issues, and the concerns of the community and councils, must be resolved collaboratively between the NSW Government and constituents. The process so far has done more to undermine councils and public confidence than it has to convince me that the Government actually wants the best possible outcomes. The lack of social licence and community support

building, in addition to the lack of clarity about the evidence base/advice on which these policies were developed, runs the risk that decades of local knowledge will be overridden. This could result in poorer outcomes for the built and natural environment.

The reforms that have been proposed do not have the necessary safety mechanisms built in to ensure communities benefit over developers. Value capture mechanisms and disincentives for land banking should be in place before changes are implemented, to prevent poor development outcomes and massive windfall gains by developers at the expense of communities.

All planning changes must recognise the nexus between natural and built environments and how climate change will fundamentally shift the needs of both. The minimum building standards of yesterday cannot be seen as acceptable in an era of dual extinction and climate crises. All planning decisions today should seek to regenerate the connection between built systems and natural ecosystems, as well as providing for all people to remain safe and secure in housing through the rapidly changing climate.

I strongly urge the committee to consider the issues that I have raised in this submission. The people and environment of NSW need to be better served by planning decisions. The Government has not conducted enough consultation with the community, nor have they undertaken to convince people that their plan is sound and well supported. All planning decisions should have flexibility and regeneration as fundamental principles and should prioritise the delivery of genuinely affordable and public housing to meet community needs.

Yours sincerely,