

**Submission  
No 1**

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

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**Date Received:** 25 February 2024

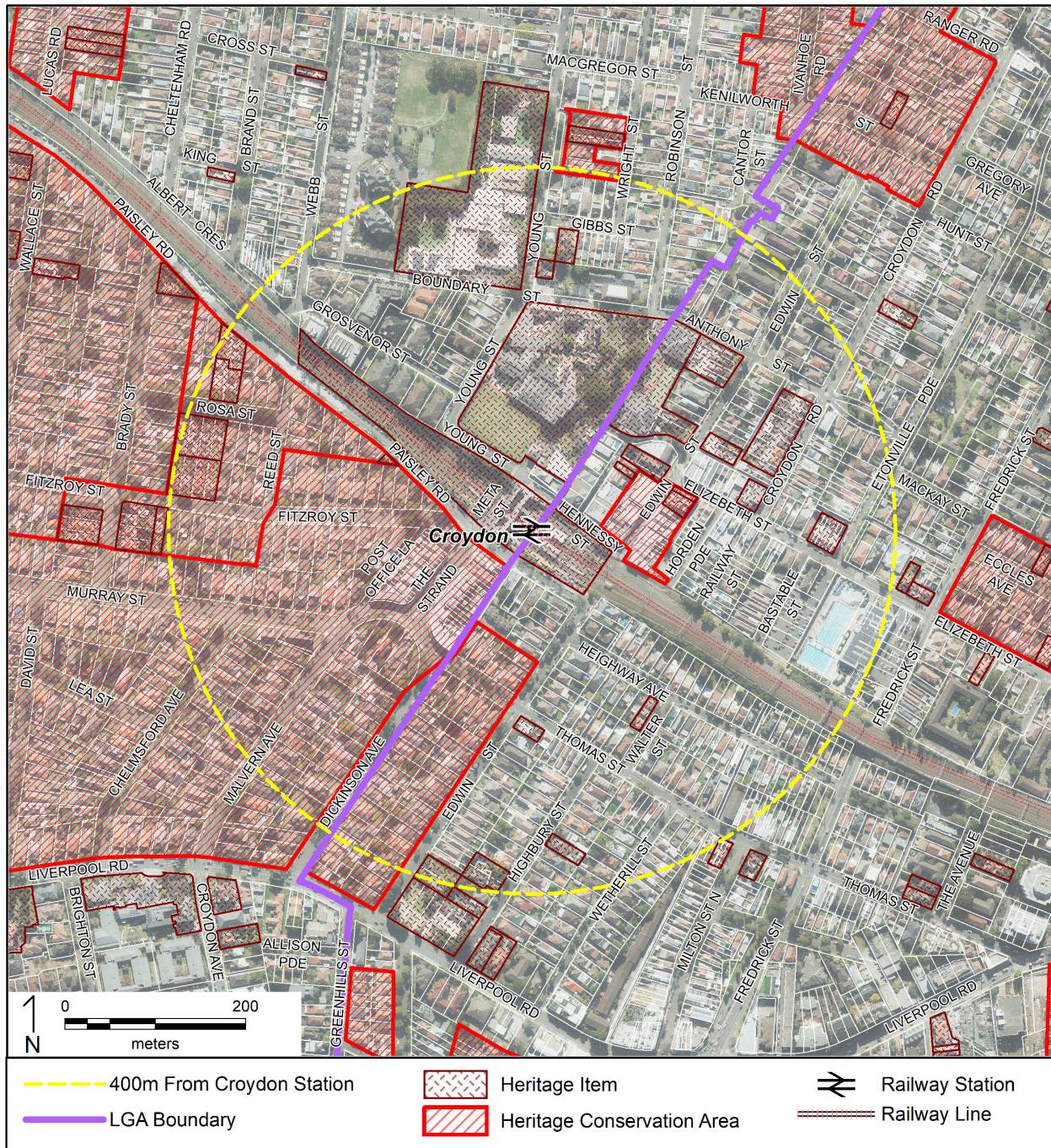
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The impact on Croydon of the  
Transport Oriented Development  
State Environmental Planning  
Policy (TOD SEPP)

Your House Here



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# THE TODD SEP PROCESS

- No public consultation (Local Councils had until 29 January to comment, that's it)
- The SEPP is to come into force on 1 April 2024
- No compulsory acquisition of properties means residualisation of existing houses (as shown earlier) can and will occur

# The impacts of the TODD SEPP

- Areas affected in the Inner West:
  - The “Homebush” precinct (one of the 8 precincts identified in the TOD SEPP part 1) has a 1.2 kilometre radius that includes parts of Homebush, Strathfield and Burwood and affects three LGAs (Strathfield, Burwood and Canada Bay). It would take out a chunk of Strathfield heritage conservation areas, the Roberts and Moseley Conservation area (Burwood) and it extends nearly to the western edge of the Burwood North Precinct (more on the Burwood North Precinct later)
  - The TOD SEPP Part 2 identifies 31 railway stations for 6 storey apartment development within 400m circles around each of the railway stations. 4,500 units are proposed in each of these 400m areas. These railway stations include Ashfield, Croydon, Canterbury, Dulwich Hill, Marrickville and the North Strathfield Metro and affect Burwood, Inner West, Canterbury-Bankstown and Canada Bay LGAs

# Impacts on Croydon

- No rezoning is proposed but as a SEPP overrides LEP controls, the affect of the TOD SEPP is to undermine existing zonings and heritage controls to make these meaningless. No compulsory acquisitions of properties (hence the cover photo).
- 6 storey development BUT bonus floorspace for provision of “affordable” housing will effectively mean 7-8 storeys
- Pattern book designs for apartment buildings to create an accelerated approval pathway for DAs. No attention to urban design – housing just outside the 400m boundary would see 6 storey (or 8 storey) blank walls.

# Development parameters

- maximum building height 21 metres (described as 'approximately'; six storeys);
- a floor space ratio of 3:1;
- no minimum lot size or lot width;
- minimum active street frontage controls in E1 and E2 zones (local and commercial centres); and
- maximum parking
- Residential apartment buildings and shop-top housing in local and commercial centres (E1 and E2 zones) within 400 metres of the above stations.



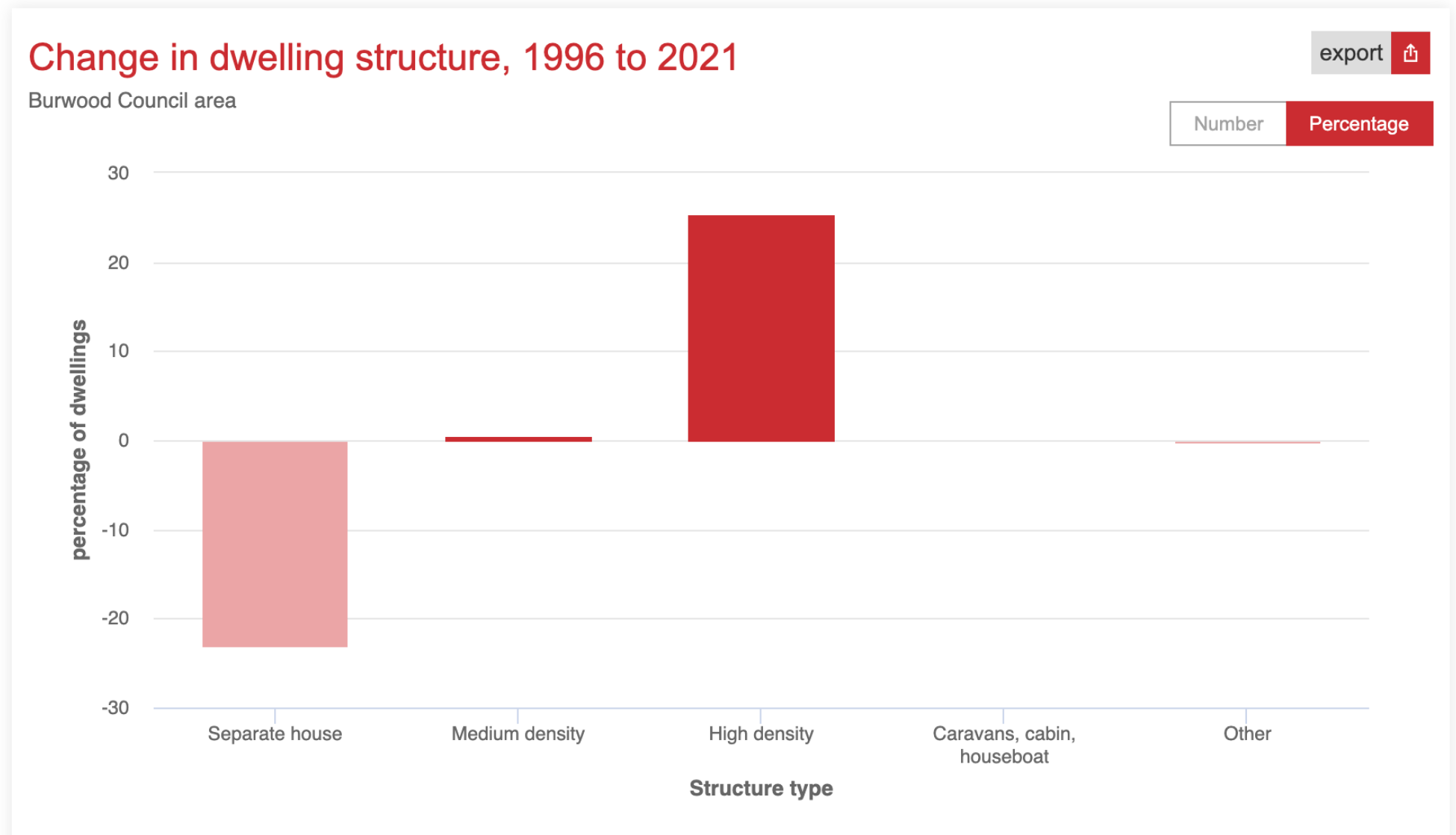
# Why target Burwood & Inner West LGAs?

- As we all know, the Burwood Town Centre has been developing over the past 20 years or so as a high rise residential/retail precinct.
- In Burwood Local Government Area (LGA) 65.8% of dwelling are medium or high density (2021 census figures). Separate houses are now only 32.8% of the housing mix in Burwood, planned to reduce to less than 20% in Burwood LGA once the Burwood North Precinct is developed.
- In the Inner West LGA, only 27.2% of dwellings are separate houses (2021 census figures). There is less high density and more medium density housing than Burwood LGA due to both the development history of the area and the impact of the airport flight paths restricting building heights.

# Housing diversity

- The NSW Dept of Planning justifications for the TODD SEPP include increasing “housing diversity”. For Burwood and Inner West LGAs, the impact of the TODD SEPP is to reduce housing diversity to the extent where there will be so few separate houses remaining that it will drive families out of these LGAs. Burwood has had an over 20% reduction in separate dwellings since 1996.
- The threat to the heritage of these areas is the biggest threat since the 1970s passing of the NSW Heritage Act (1977) and the NSW Environmental Planning and Assessment Act (1979). The vast majority of heritage in NSW is protected by local councils via Local Environmental Plans (LEPs) – the TODD SEPP makes LEP heritage controls in the affected areas meaningless.

# Burwood LGA – changes in dwelling types



# Burwood LGA – new residential development already approved or being planned (without the TODD SEPP)

- Burwood North Precinct (Masterplan and Planning Proposal on public exhibition and open for public comment until October 2023). 5,366 new residential units proposed with an estimated population increase of 15,473 (from the Masterplan document)
- Burwood RSL development. (close to Burwood Railway Station) – 20 storey tower plus 4-6 storey developments. DA approved, construction not yet commenced.
- Burwood Place development 42-60 Railway Parade Burwood (west of Burwood Road, close to Burwood railway station) – 5 towers, 12-42 storeys with 7 levels basement parking (2100 car spaces), 1,041 new residential units – increase in population envisaged 2,602 persons (DA approved, construction not commenced)

These developments alone represent a future increase in the Burwood LGA population of approximately 20,000.

# Burwood North Precinct – artist's impression



Figure 67: Aerial Artists Impression looking north. Source: Scharp

# Burwood RSL development



# Burwood Place



# The facts about development and new housing provision in Burwood LGA

- Burwood LGA has already exceeded the NSW State Government targets for new housing
- The Burwood LGA population was 36,809 in the 2016 census – it is now 40,217, with another 20,000 increase in population in the pipeline by 2030 (without the TOD SEPP).
- Population density in Burwood LGA is 5,726 people per km<sup>2</sup> (2021 census). The population density of Green Square (Sydney LGA), the most dense residential development in Australia, is currently 12,500 persons per square kilometre (though envisaged to increase further). Burwood North, after development of the Burwood North precinct, is envisaged to have a population density of around 20,000 persons per km<sup>2</sup> (without any new schools or community facilities being planned).
- Burwood Council has the lowest amount of public open space per capita in NSW.



# Conclusion

- Burwood LGA has already done its fair share in providing new high density housing and has already planned a population increase of over 20,000 in the next few years through approved and already planned developments which are close to railway stations.
- The TODD SEPP is a threat to housing diversity in Burwood which, if it goes ahead, will drive families out of Burwood LGA due to the scarcity of separate dwellings
- There is no justification for this unprecedented attack by the NSW state government on the heritage of Croydon, including the Malvern Hill Estate Heritage Conservation Area (HCA) which has been protected by LEP heritage controls for over 38 years (since 1986) and the Cintra Estate HCA which includes the largest collection of pre World War I concrete houses in Australia, which is unique.