

**Submission
No 66**

INQUIRY INTO DEVELOPMENT OF THE TRANSPORT ORIENTED DEVELOPMENT PROGRAM

Name: Anne Carroll
Date Received: 24 March 2024

Dear Committee Members

Transport Oriented Development Program” [TOD] and
“Changes to create low and mid-rise housing”.
[the Policies]

I understand the need to increase the number of dwellings in NSW.

However, I do not support these so called ‘planning’ “Policies” which are intended to increase dwelling numbers and address housing affordability in NSW. What is proposed is wrong. The “Policies” reflect a “Terra Nulla” blanket, one-size-fits-all approach which:

- fails to recognise that the intended areas for the increased number of dwellings are not flat, blank, uninhabited, vacant ‘canvases’;
- fails to recognise that there are different topographies, contexts, characteristics, opportunities and constraints in the intended areas;
- fails to uphold the established controls that underpin the entire environmental and heritage planning system in NSW;
- fails to recognise that what is needed is a tailor made, master planned approach sensitive to valuable, valued and varied contexts and topographies;
- failed to recognise the Housing Accord of commitment for State Governments to work with Local Governments;
- failed to provide the detailed information on the criteria or analysis for selecting the stations slated for TOD rezoning;
- failed to provide the evidence for selecting the particular transport hubs;
- fails to provide for the provision of increased infrastructure such as schools, hospitals, libraries, waste depots and for increased recreational facilities such as parks, playgrounds, green spaces, sporting fields; and
- fails to recognise that the existing transport and road systems are already under pressure and are struggling to keep the “city” reliably moving without adding increased pressure from increased population.

These failures show that these “Policies” are not about planning. They are a blunt, blind quick-fix, secretive, destructive, sledgehammer response, a knee jerk reaction to a housing crisis that has been a long time coming.

To increase dwelling numbers and provide housing affordability there are issues beyond proper planning that require urgent action at Federal Government Level and at NSW State Government level.

At Federal Government Level: The NSW Government should call on the Federal Government to:

- set in place A “National Settlement Strategy,” an issue for which the Planning Institute of Australia has been lobbying for some time. “After reviewing 57 regional planning strategies, we realised Australia didn’t have a holistic plan to accommodate growth in our urban areas. So we called for a National Settlement Strategy.”
- introduce far greater restrictions on allowing non-citizens to buy property such as Canada has done or as other countries have done - ban foreigners altogether from buying real estate, <https://realting.com/news/where-it-is-banned-or-hard-for-foreigners-to-buy-real-estate>

The availability (and therefore affordability) of housing stock is negatively impacted by overseas investors who purchase properties to ‘bank’ their money in Australia’s safe democratic system. Having denied others the chance to purchase a home in which to live, the investors, who generally are able to outbid local buyers and are cashed up to buy an unlimited number of dwellings are known not to offer the properties for rent, further diminishing supply and causing prices to rise.

- reduce immigration numbers to manageable levels. Housing supply is not keeping up with local demand without the added demand of providing housing for new arrivals.

“The primary solution to Sydney and Australia’s housing shortage is to limit immigration to a level that is below the capacity to provide high-quality housing and infrastructure.

Otherwise, the housing crisis will become permanent.

The NSW government should at least be honest about the situation, instead of gaslighting people into believing that Sydney’s housing shortage is a supply issue.

Too much net overseas migration is the problem, and it is driving young residents out while forcing others to live in insecure housing or debt slavery.” [Leith van Onselen, Economist, 16/2/2024]
NSW Planning Minister spins web of housing lies - MacroBusiness

- address the supply, costs and the reasons as to why the building industry is struggling. According to the University of NSW (UNSW). A range of economic conditions are causing turmoil in the construction industry, including supply-chain issues, rising interest rates, and pandemic-era stimulus ending. It's been labelled a "perfect storm" by the University of NSW (UNSW).

At NSW State Government Level: The NSW government should

- address the issue of dwellings that are only offered for short-term rentals.
- introduce effective measures to discourage dwellings from lying unoccupied for extended periods.
- address land banking by major builders and developers.

Densification Planning Issues

be it “Transport Oriented Development Program” [TOD] or
“Changes to create low and mid-rise housing”.
[the “Policies”]

- Densification needs to be master planned, tailor made to an area when retrofitting it into existing residential areas, employing time honoured planning considerations which should be the approach adopted for all the intended areas including Ku-ring-gai.
- Densification should not be done at the cost of destroying universally valued and valuable contexts. In Ku-ring-gai, for example, under the proposed “Policies,” there will be widespread loss of Government gazetted heritage items and conservation areas, of trees, greenery and character. Ku-ring-gai was established as a series of garden suburbs which provide wildlife habitats and wildlife corridors between three National Parks.
- Densification should include provision for supporting infrastructure to accommodate the increased populations; such infrastructure as additional sporting fields for team sports, general-use open space and other amenities. The importance of local open space in supporting community

well-being was firmly established during the recent COVID19 pandemic. The provision of new parks in areas of new unit development fosters the creation of new local communities and becomes a local focal point. There is little evidence of provision of this vital part of planning with these “Policies.”

- Density should not overburden an already deficient transport and road system, as these “Policies” will do. In Ku-ring-gai the adverse effects are likely to be exacerbated in the Gordon, Lindfield and Roseville centres, due to the close proximity of Pacific Highway and the T1/T9 North Shore Railway line presenting a constraint to local access, with limited crossing opportunities of the railway line and the Pacific Highway – the main north-south route.

- Density should be mindful of climate change. “The Greening our City Program” the Urban Planning website states:

“To create a sustainable, liveable and cool Greater Sydney, we need urban greening, which includes urban canopy and green cover. More urban greening means communities have more shade, cleaner air and more beautiful places to live.

The Greening our City Program has several initiatives to help reduce urban heat and create a cooler, sustainable and more liveable city.

The program aims to increase green cover across Greater Sydney and contribute to lifting urban canopy coverage to 40% by 2036.

<https://www.planning.nsw.gov.au/policy-and-legislation/urban-greening#:~:text=The%20Greening%20our%20City%20Program,coverage%20to%2040%25%20by%202036.>

In Ku-ring-gai with what is proposed thousands of trees will be removed and its general green environment severely diminished. Such destruction is nonsensical and is counter to the Government’s active encouragement and awarding of grants to other areas to green and plant trees to achieve what Ku-ring-gai already possesses.

Hard surfaces with heat island effect will be greatly increased.

- Density should not ignore and mock the Department of Planning and Environment’s own website on Biodiversity that states:

“Biodiversity is vital for supporting human life on Earth, supplying clean air and water, healthy ecosystems and fertile soils.

'Biodiversity' or 'biological diversity' is the variety of life on earth and can be thought of in terms of genetic diversity, species diversity and ecosystem diversity.

Biodiversity includes all the different plants (from lichen and mosses to shrubs and trees), animals (invertebrates, frogs, reptiles, birds and mammals) and micro-organisms such as bacteria.

The importance of biodiversity

Biodiversity is vital in supporting human life on Earth. It provides many benefits, including food, medicines and industrial products. It supplies clean air and water, and fertile soils.

Australia is home to more than one million species of plants and animals, many of which are unique. About 82% of our mammals and 93% of our frogs are found nowhere else in the world.

Over the last 200 years, the Australian environment has been modified dramatically. Australia has lost 75% of its rainforests and has the world's worst record of mammal extinctions.”

<https://www.environment.nsw.gov.au/topics/animals-and-plants/biodiversity/about-biodiversity>

Ku-ring-gai is currently home to 7 endangered ecological communities, 2 Critically Endangered (BGHF, STIF), many threatened fauna and flora species, 700 native plant species, more than 300 vertebrate species, and numerous invertebrates. Ku-ring-gai green environment provides not only native fauna habitats but also wildlife corridors between the three National Parks that abut/surround the Ku-ring-gai LGA.

If the Policies proceed there will be massive devastating destruction of Ku-ring-gai's green environment - habitats and wildlife corridors will be annihilated, all biodiversity will be negatively impacted, the average canopy in the residential areas of the TOD could drop from 30% to 7%.

- Densification with its increase in hard surfaces and increased water run-off should not risk the “Water Sensitive City Program.” This is particularly so with Ku-ring-gai, as the runoff from Ku-ring-gai's waterways, encompassing 171 km of creeks, has the capacity to imperil three of Sydney's major water catchments.

Summary:

“Transport Oriented Development Program” [TOD]

A one-size-fits-all approval process does not make allowance for local conditions be it Ku-ring-gai, Bondi, Croydon or the Inner West. For example, many sites within the TOD area in Ku-ring-gai are development constrained by one or more of the following important and significant issues: tree canopy, biodiversity, wildlife corridors, riparian, bushfire hazard, steep land, and Government gazetted heritage. The “Transport Oriented Development Program” [TOD] should not proceed.

“Changes to create low and mid-rise housing”.

A one-size-fits-all approval process does not make allowance for local conditions be it Ku-ring-gai, Bondi, Croydon or the Inner West. For example, many sites in Ku-ring-gai are development constrained by one or more of the following important and significant issues: biodiversity, riparian, bushfire hazard, steep land, and being part of a wildlife corridor between National Parks.

The blanket dual occupancy approval provisions should not proceed. For the overall benefit and well-being of our city, Councils must be able to limit the amount of clearing on properties when additional dwellings are added so that mature trees are retained.

There needs to be proper planning reflecting all aspects of planning not just so-called planning “Policies” that dump as these “Policies” do on selected areas.

Yours sincerely,

Anne Carroll OAM