

**Submission
No 67**

INQUIRY INTO DEVELOPMENT OF THE TRANSPORT ORIENTED DEVELOPMENT PROGRAM

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In case the attachment failed - I oppose the TOD and Well located housing policy for the following reasons - it will not address the need for affordable and social housing as nothing in these will guarantee cheap housing- it is a clumsy one size fits all approach -, no evidence was provided to justify any part of the policies assumptions - heritage conservation areas should be excluded in the interests of intergenerational sharing of this critical public asset, not sacrificed to no good end - minimum lot size and width controls need to be implemented for RFB development rather than just leaving this to the developer industry (not known for their consideration of anything other than profit) - the nomination of radii (eg 1200m, 800m, 400m) needs to be nuanced to take into consideration physical barriers to walkability eg rivers, six lane highways, etc)

TOD SEPP – 1200m makes very little sense.

“accelerated precincts within 1200m of nominated stations”

There is no compelling argument as to why a distance of 1200m has been nominated. Studies of pedestrian and commuter behaviour have repeatedly shown that people are only willing to walk about 400m to a transport node. After 400m willingness to walk drops off markedly. With the Bays Precinct in particular the 1200m is nonsensical. The areas to the south/east/and west of a likely metro station location are compromised by water, and a six lane highway with only modest walker permeability.

The areas to the north are also compromised by busy roads (Victoria Road and Roberts St/Mullens St) as well as being steeply uphill. Whilst with the other metro stops it is possible that feeder bus journeys may make meaningful connections from the outer parts of the 1200m radius to the metro station, this is not the case with Rozelle/Balmain. No-one is going to catch a bus for five minutes, then get off the bus, and transfer to the metro in order to get to the CBD (which is where most people from Balmain/Rozelle will be heading if public transport is their preferred form of mobility – believe me) because the bus journey is quick and seamless – why break it?

The Bays Precinct metro is much better suited to an inherent-design development outcome, similar to those adopted around the outskirts of Kuala Lumpur, which provide for essentially self-contained vertical “villages” immediately abutting and over the metro stop.

Heritage: The (voting) community quite likes heritage.

Heritage Conservation Areas must be excluded from the “one size fits all” model. Councils should be provided with additional resources to develop place-based, informed controls which create a balance between the protection of heritage, and the desire for more density. The NSW community has made it clear that it strongly supports heritage and is concerned by the suggestion that heritage must be sacrificed for density. There are many models available both within Australia and overseas, which demonstrate how the two can be reconciled. Z

Alternative locations – evidence based decision making?:

There are many railway stations in Greater Sydney which have been excluded from this policy. No explanation has been given as to why this is. The community already regards planning at State level in New South Wales with cynicism. Failure to demonstrate, and allow third party review of, the evidence which underlies the choice of locations, only adds to the distrust already evident in the media and on social platforms.

Four to Six storey apartment buildings - tensions in low density areas:

Stronger controls are required in order to ensure the protection of the quality of life of existing residents – privacy, sunshine, bulk/scale. These controls should incorporate minimum lot sizes and widths (see, for example, the housing pattern book in Victoria). Without minimum lot size and width you cannot ensure reasonable setbacks, deep soil planting, vehicle access, perimeter landscape screening and the like. The ADG is not well designed to manage tensions between single dwelling lots, and four-six storey RFB developments. There should be additional specific controls incorporated in the ADG in this regard.

Well Connected Stations and Town Centres – what are these? Where are these?

The document refers to “ E1 local centre or MU1 mixed use but only if the zone contains a wide range of frequently needed goods and services such as a full line supermarkets, shops and restaurants”

No further criteria are provided – there is no assistance here for voters in Greater Sydney to know whether their area is affected, and if so, how.

Affordable housing not a guaranteed outcome – so why proceed with a knee-jerk reaction?

Nothing in this proposal ensures that housing in Greater Sydney will become more affordable.

Firstly, it is economically simplistic and naïve to suggest that it is simply a matter of increasing housing supply. This theory assumes the market demand is steady and finite. It isn't. The demand for Australian housing comes from many places other than Australia, due to our stable government, climate and financial sector. This is a good place to stash money. No matter how many dwellings we build, the market demand side will always outstrip it, unless Federal immigration and taxation policies change. It is too easy for foreigners to buy Australian housing.

Secondly, it is highly unrealistic to expect that the developer industry in NSW will flood the market with a cheap version of its product, and undercut its profit margins, which are already stretched due to labour and supply issues. The industry is not going to bankrupt itself. Prices will stay high.

If it were otherwise, 100% of planning approvals for new apartment buildings would commence construction. They don't.