

**Submission
No 86**

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

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This is a proposal which considers the housing crisis and its solution without reference to the key contacts of liveability. And without reference to the context of how to deliver housing given the existing free market policy framework without making housing even more unaffordable than it now is.

I note what everybody else “up in open arms” will say: this is the destruction of the heritage of the city, and the integrity of its landscapes, the very things that make the city half-way liveable. Generations to come will look upon this proposal, shake their heads and condemn all who support it. Heritage supporters will be right to complain.

I shall focus on the Inner West and specifically Marrickville, but many other areas are also affected by this ill-thought-through proposal.

Regarding heritage it is extremely important to note that Marrickville has only 1 percent of its area or building under heritage protection compared with Dulwich Hill 34 percent or Roseville 43 and Killara 73 percent. Marrickville is already heavily discriminated against due to the previous Marrickville Council’s refusal to establish heritage conservation areas advocated by the Council officers themselves. Marrickville is not lacking in heritage, but preserving that heritage has always been a political football, and the suburb appears to again be picked on, and will be disproportionately affected given the weakness of the local council in regard to both developers and the State Government.

Landscape impacts on heritage

The current plans mean many viable, well built properties will be demolished to put up dubiously engineered but vastly bigger and uglier new ones. The record, for example around Canterbury Station is already a bad one. These are not communities but buildings. They impose on the landscape. Discovery Point at Wolli Creek is a similar soulless and gloomy outcome.

Trashing federation and other heritage houses trashes streetscapes and neighbourhoods. This is a key problem. Pockmarking suburbs with new randomly chosen (by the market) high and medium rise development means undermining the coherence of streetscapes. It is aesthetic destruction of what makes the city seem worth living in.

Implementation is flawed by free market ideology

Random implementation will prevail and cannot solve the housing crisis. To do this requires compulsory acquisition or rezoning of properties in entire suburbs or, at least, sections of suburbs. It also requires rezoning around train stations in greenfield areas, and brownfield ones too. It also requires integration with economic policies of an end to negative gearing, removal of capital gains concessions, and removal of subsidies to homeowners that drive up prices (first-home-owner subsidies are close to worthless in a market characterised by high inflation of land prices. It’s like burning public money).

Random, free market development needs to be replaced with rent control and massive public housing redevelopment (the exact opposite of what is happening today). The current provision for affordable housing is inadequate.

The current plan is a tweaked rehash of the discredited one from the 2017 period. That was, and is now to ram in more and more people without any coherent policies to deal with increased road use, train overcrowding (the new Metro expectations for the old Bankstown Line are pie in the sky), low green space hectares per person, and parking spaces.

I want to put this proposal in the key wider contexts that are missed in the document.

The proposal lacks a number of these key contexts that must be addressed. These require research, not a lazy public relations document.

1. Open space compared in different regions:

A 2019 article shows that the Inner West was severely disadvantaged already in terms of open space compared with every other area in Sydney, especially on a per capita basis. See 'Green space and beaches': why Holly Throsby is leaving Sydney. Sydney Morning Herald, 7 April 2019.

But this proposal aims to make the situation worse by turning most of the suburbs into medium and high density living.

The 1976 plan of landscape design for the Cooks River Valley pointed out, Cooks River Environment Survey and Landscape Design: report of the Cooks River Project, pp. 123-27 that the entire area of the valley was way short of recognised international standards for recreational space per capita, and that was 50 years before the apartment building boom in the early 2000s! The open space is not only inadequate. There is no way that it can be added to significantly without demolishing half the surrounding suburbs and re-naturing the landscape without houses. Actually, this would be a good thing, but we all know there is not going to be significant new space for recreation; quite the contrary, the tendency for several decades has been to fence off or otherwise control and limit open space areas, especially those that have become dominated by major sporting clubs to which the Inner West Council aims its parks and sporting fields policies. See my River Dreams: The People and Landscape of the Cooks River (UNSW Press, 2018).

2. Road traffic: This is already close to intolerable in many places. My area of Marrickville is chronically congested, with cars routinely running the red lights, and thereby threatening pedestrians.

3. Parking:

This proposal reduces the amount of parking available. Marrickville is already parked out. Getting a park in my street, considered the leafiest in Marrickville, is almost impossible except perhaps around midnight, or very early in the morning on Sunday. Delivery vans must routinely double park; tradesmen can't get access without clever scheduling by owners.

The planners need to face the reality that many residents have multiple cars; my neighbours all have multiple cars, sometimes three or four for each house. My street is also close enough to businesses and is used as an all-day car park. It is only easy to park between 24 December and about January 6, each year, and other occasional holidays. Many people also park to use the local private school and a preschool.

The situation with parking is already close to intolerable. This proposal tips over the situation into an impossible one.

Driver behaviour needs to be understood.

Current planning seems to want to force people out of their cars. Good idea if you could make it work, but, seriously, this document makes no attempt to study driver attitudes and mores. You need actually to do serious studies of real driver motives and behaviours. Most people will still buy and use a private motor vehicle because they use them for multitasking, e.g., 1) get the kids to the (private) school instead of forcing them to walk or go by bus as I did as a boy; 2) routine and on the spot trips for shopping at shopping centres; 3) for weekends and school holidays away from Sydney; 4) to get a member of the two parent, two income household worker family to disparate places of work (it is a great fallacy that all jobs are neatly distributed where both husband and wife can get to them by public transport or in just one car). Different family members very often go in different directions and cannot efficiently use the trains, which in any case work on the "spokes" of a wheel system funnelling into the city centre, thus missing the unavoidable extensive cross-town journeys poorly served by mass transport.

4. Environment: Heat effects

A major contributor to our rising city temperatures is the heating effects of ever more concrete and (often black) tiled roofs etc. But in-fill is an environmental disaster for this reason, quite apart from the colour of roofs. Tree cover will inevitably be reduced, whereas only increased, not reduced, tree cover can give us any hope at all of surviving the climate crisis. See, e.g. the work of Sebastian Pfautsch, University of Western Sydney, an expert on heat effects. See, <https://www.governmentnews.com.au/councils-heat-island-study-a-first-for-eastern-sydney/> .

5. Environment: Storm run-off

The proposal wisely states that flood prone areas will have to be "managed" but the main issue is the increased runoff into creeks and rivers whenever and wherever more surface of a building block is covered with a roof and yards are turned into concrete spaces. You are proposing to

replace green space backyards of the old houses with concrete catchment areas. The effects on the Cooks River Valley's hydrology will be immense.

6. Waste Problems:

This process involves much waste through demolition. In Sydney demolitions, brick and timber materials are routinely sent to the tips. Salvage procedures are inadequate and much waste of material occurs. This issue is not addressed.

7. Carbon Budget and Environmental sustainability:

There is no attention in any of these proposals to the city's carbon budget and our dire climate future unless we become sustainable environmentally, now.

8. Social Aspects: Affordable housing

This proposal makes the motherhood statement that the government will work with councils to implement better and more affordable housing, but that is just words. Affordability is not going to emerge from this wholesale opening of the city of Sydney to intensified private development using market place incentives. It will supercharge construction where the profits are most, i.e., subject to the free market for the provision of private housing stock. We are crying out for the government to resume the building of PUBLIC HOUSING and adopt to RENT CONTROL.

9. Housing Supply:

Where is the capital to do all this to come from quickly? And where are the properly trained tradespeople who can build these extra apartment blocks? This policy in the absence of such practical detail is going to be a death by a thousand cuts as ramshackle development takes hold across the whole of the city.

10. Process:

As now routine with governments, there seems to be a desire to ram ill-thought-out plans and thought-bubbles through quickly and to limit opportunities for criticism.

Most people are still unaware of this proposal, but they will be before the next State and Federal elections and somebody in government will get the blame.

The proposals themselves need to be examined by an independent commission, so I applaud the holding the current inquiry by the Upper House of the NSW Parliament. At present the policy is really just a promotion brochure for land development in the whole area. It uses cliché and ill-defined terms such as “manor house” (anyone who has been in a real manor house in England would shudder.)

Imprecision in this proposal is a problem of inadequate public process.

It amounts to motherhood statements and waffle.

Thus, for example,

“reasonable front and backyard” p. 33: what is “reasonable”?

What does this jargon really mean: “proposing” to “work with councils to introduce affordable housing contribution schemes” on land with “sufficient value uplift.” (p. 30)

What does “uplift” mean? Where’s the evidence of “proposing”?

p. 30 “one space is sufficient to ensure there is not a significant (?) impact” on car parking availability in the street. This is one of the most egregiously false statements in the entire document. The streets are already fully parking out within 800 metres of a rail station, and much more too.

p. 30 Development within 800 metres “walking distance” but only if there are “full” range supermarket etc. What exactly is a “full” supermarket? Is this standard to be kept to? (I doubt it) and who is going to measure the 800-metre zone? I hope it’s not like 2017-18 version, where the 800 metres from a station was measured by a compass, and without ever having set eyes on the territory measured to understand the contours of the land and the existing housing stock. Development needs to be sensitive to the contours of the land and the landscape of functioning suburbs. That is, the existing pattern of development. If you are not going to do compulsory acquisition of whole suburbs to demolish them entirely and PLAN their holistic redevelopment this policy cannot possibly work.