

**Submission
No 104**

INQUIRY INTO DEVELOPMENT OF THE TRANSPORT ORIENTED DEVELOPMENT PROGRAM

Organisation: Mosman Council

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25 March 2024

Ms Sue Higginson, MLC
Chair Portfolio Committee 7 - Planning and Environment
Parliament House
Macquarie Street
SYDNEY NSW 2000

Submitted online

Dear Ms Higginson

Submission – Parliamentary Inquiry into the development of the Transport Oriented Development Program

Thank you for the opportunity to provide comment on the inquiry into the development of the Transport Oriented Development Program.

Mosman Council welcomes a review of the development of the Transport Oriented Development Program. This submission relates to Item (o) within the Terms of Reference, the impacts of the proposed Diverse and Well-Located Homes process and program.

Council considered the Explanation of Intended Effect: Changes to create low and mid-rise housing (EIE) at its Council meeting on 6 February 2024 and whilst supportive of introducing measures to address the housing crisis, Council raised significant concerns with the proposed one-size-fits-all approach outlined within the EIE.

Increasing the supply of homes is critical to addressing the housing crisis in New South Wales. However, it is important that planning approaches are carefully thought out and respond to the needs of local communities.

Council's principle concern is the proposal to move away from long-term strategic planning processes which have been carefully constructed with input from the community and the guidance of successive governments led by a variety of planning ministers as well as having received approval by the now dissolved Greater Cities Commission. If enacted, the proposals outlined within the EIE would irrevocably alter the character of place established under *Mosman Local Environmental Plan 2012*, represent a transformative change to Mosman's urban environment and would result in substantially larger built forms, dwelling yield and future population than Council and the community had anticipated.

Rushed planning decisions, in isolation and in defiance of existing controls and applied in a one-size-fits-all manner, against the expectations of local communities and without the requisite infrastructure, only creates significant issues for everyone down the track and will not solve the housing crisis. Action should be in accordance with strategic planning processes and have regard for:

- Local circumstances and careful consideration for the amenity and well-being of future communities.
- The significance of heritage items and heritage conservation areas.
- Maintaining and enhancing tree canopy cover to mitigate the impacts of the urban heat island effect to ensure urban areas are resilient to a changing climate.
- Flooding and other hazards (including coastal management, bushfire, contamination and acid sulfate soils), many of which are expected to increase in risk due to the effects of climate change.

The increased yields that would be realised under the Diverse and Well-Located Homes program would place additional strain on already stretched infrastructure and services. Local infrastructure planning will need to be revisited should these reforms be introduced. The State has not demonstrated how it will provide additional infrastructure to support the increased yields when existing infrastructure already exceeds capacity, including schools, hospitals wait times, patronage of public transport, emergency services response times and insufficient sporting and recreation facilities.

Such radical reforms should not be applied in a one-size-fits-all approach and consideration must be given to the individual circumstances of each local government area. The proposals as outlined under the Diverse and Well-Located Homes program would result in development without planning, the impacts of which will be recognised overtime when it is too late.

Mosman Council would welcome working with the Department of Planning, Housing and Infrastructure to implement changes that have regard for local circumstances. Only with such a collaborative and united approach can we meaningfully address the housing crisis in a manner that does not erode what we value about our local areas and the trust our communities have in the planning system.

If you would like further information on Mosman Councils' position, please contact Team Coordinator Urban Planning via email

Yours sincerely

Dominic Johnson
GENERAL MANAGER