

**Submission
No 114**

INQUIRY INTO DEVELOPMENT OF THE TRANSPORT ORIENTED DEVELOPMENT PROGRAM

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Turrella is included in 31 suburbs to be rezoned under the TOD program, designated as a Tier 2 TOD, allowing residential flat buildings within 400m of the station. It is not clear whether this means only mid-rise flats up to six storeys or includes high-rise flats. Medium and high density housing is inappropriate for **Turrella** because of the topography, flooding due to its low-lying position, traffic congestion, environmental impact, and the potential loss of local jobs.

The DAWLH Program explanation document states (pages 27-28), that non-refusal standards will apply to facilitate medium-density housing within 800 metres of all train stations. We assume this to mean that residential flats of six storeys (or eight storeys including the affordable housing allowance) are planned for **Turrella**, Bexley North, and Bardwell Park stations, enabling a continuous corridor of mid-rise development 800 metres either side of the Airport train line from Wolli Creek station to the western side of Bexley North station, and beyond to Kingsgrove.

We are not against development or change. **We are in support** of integrated planning and development and consultation with the local community and councils, to ensure that the housing density levels are appropriate for our suburbs in a way that respects the needs of the whole community, its urban character and available infrastructure. **We are against** this cookie-cutter approach to planning, arbitrarily zoning areas as suitable for multi-dwelling, mid-rise and high-rise housing, without consultation with councils or communities, and without consideration of the particular characteristics of these areas.

Given the current infrastructure and traffic issues in **Turrella**, we consider that multi-dwelling housing, and a limited number of low-rise residential flats, may be appropriate for some parts of these suburbs, provided that significant green space and tree canopy is retained, and consequential infrastructure needs are adequately addressed.

There are eight areas of concern which are relevant to the Terms of Reference, which are detailed below:

1. Lack of clarity and detail:

NSW Planning has identified land within 400m of **Turrella** station for Tier 2 Transport Oriented Development (TOD) rezoning by 1 April 2024. But the documents provided by the Department are unclear:

- whether 'transport hub' rezoning will extend to within 800m of **Turrella** station and the other 30 identified railway stations in addition to the TOD rezoning,
- what will happen with areas within 400m and 800m of Bardwell Park and Bexley North stations and when will it occur,
- whether Earlwood is a 'town centre' within the meaning of the TOD Program.

Our community needs more detailed and certain information so we can plan for the future and provide input from the perspective of people who currently live and work in these suburbs.

2. Unsuitability due to geological features:

The TOD Program's blanket approach does not take account of the topography, traffic impediments, local infrastructure limitations, and protected bushland and waterways of the area, including the Wolli Creek Regional Park.

Applying the uninformed and indiscriminate planning provisions to these areas without genuine and sustained community consultation will lead to poor planning and building outcomes, cost blow-outs for public infrastructure and irreparable damage to the remnant natural environment.

Turrella, Bardwell Park, Earlwood, and nearby Arncliffe are built on steep sandstone escarpments, so access to sites is difficult, excavation into solid rock is expensive, and many streets are narrow with little room to expand. This means that building is more costly than on flat and non-rocky areas. It requires local knowledge to plan well for the environment, which requires consultation with local councils and communities.

Premier Minns in March 2024 committed \$13 million from the budget to complete the Wolli Creek Regional Park. It contains critical remnant bushland, waterways and ecologically significant vegetation and wildlife, including a protected flying fox colony. We are greatly concerned about the impact of development adjacent to the park.

The Wolli Creek Regional Park and Bardwell Valley Parklands provide connected areas of ecologically significant vegetation and waterways. Federal, state, and local governments have spent significant funds to improve the water quality and stormwater management into the Cooks River. Green spaces and tree canopy are vital for a healthy community. Increasing residential density in these suburbs and replacing absorbent gardens, trees and grass surfaces with hard surfaces will cause greater run-off of storm water and pollution, damaging these waterways. The proposed increases in density will increase pressure on existing infrastructure, worsen road and public transport congestion and reduce the liveability of our suburbs.

3. Heritage ignored:

The TOD and DAWLH Programs do not deal with heritage issues. They compare Sydney to other cities in terms of density, population, and infrastructure. It is not appropriate to simply impose a 'one-size-fits-all' approach. The vicinity around **Turrella**, Bardwell Park and Bexley North stations has its own unique heritage of a mix of Victorian, Federation, and Mid Century. Which the community has worked hard to preserve from inappropriate development and find practical alternative solutions. Only a few Victorian period homes still remain in **Turrella** which ought to be preserved. The arbitrary planning approach proposed by the Programs will reduce much of this heritage and disrespect the work of community volunteers.

4. Flooding:

Wolli Creek, which adjoins the T8 Airport line along **Turrella**, Bardwell Park and Bexley North stations, and the M5 Motorway at Bexley Road, floods regularly, causing traffic and infrastructure chaos, which will be exacerbated with increased density. The suburbs lay within the Sydney waterways ecosystems, including Bardwell Creek, Wolli Creek, and the Cooks River. Flooding occurs regularly adjacent to the T8 Airport line at **Turrella**, Wolli Creek,

Bardwell Park, and Bexley North stations. This significantly affects trains, road traffic, and pedestrian access, especially at the two bridge points which cross Wolli Creek north to south. This will be exacerbated with increased population density.

Turrella station is to become a Tier 2 TOD with medium or high rise housing. The area within 400 metres of the station is on very low-lying land, on sandy river soil and sandstone. It floods in storm events, causing significant traffic, train, and infrastructure problems. Increasing density will significantly increase the adverse impacts of water inundation on the health of Wolli Creek and its flora and fauna.

Multi-level residential flats and new duplex houses typically place on-site parking and storage below ground level. For sites adjacent to Wolli Creek and Bardwell Creek, underground parking is unsuitable because of the regular flooding events. An existing high-rise complex requires pumps to keep the basement carpark from flooding.

Existing single dwellings on suburban blocks typically have absorbent gardens and lawns. Replacing them with larger multi-storey dwellings, which typically have less garden and more hard surfaces will increase flooding in these areas. Rezoning from low to medium-density housing means that more stormwater and pollution will flow into the Cooks River, Bardwell Creek and Wolli Creek systems exacerbating the flooding already occurring and may lead to residents, businesses and developers seeking redress and compensation from the State Government.

5. Traffic congestion and parking:

Greatly increasing density around **Turrella** and the other nearby stations will add to the already congested trains and suburban roads, further choking the access to and from the M5 motorway. **Turrella** is a cul-de-sac suburb bound by the Wolli Creek to the north and the Cooks River to the east. All roads in and out are narrow single lane roads, with many one way streets. The narrow roads force homeowners to park their vehicles partly on the footpath to allow other vehicles to pass. By adding to the density of housing will exacerbate this problem. Peak hour traffic already snakes around Bardwell Park and Arncliffe and the traffic in the adjoining Wolli Creek station area is chaotic. Often taking 20 minutes to travel 300 meters in peak hour traffic due to increased foot traffic entering or exiting Wolli Creek station. Adding hundreds more residents will increase the congestion and make it even more difficult for the small businesses and light industries in **Turrella** to access vital transport corridors.

Turrella and Wolli Creek railway stations do not have commuter parking. **Turrella** in particular is impacted by workers parking their vehicles in the narrow streets surrounding the station and wider suburbs. This further impacts on the overflow parking of unit dwellers from Wolli Creek who are not able to park at their complex. Without significant infrastructure changes, the increased housing density proposed by the TOD and DAWLH programs will make vehicle travel and parking in these areas even more difficult. Both programs envisage that most new residents will use public transport to commute, but people use their cars other than for work and so the roads will become even more choked. In fact, many residents park their work vehicles on the street which includes vans and large trucks.

6. Maintaining jobs, businesses, and heritage:

The TOD Program does not explain how increasing density will maintain the suburban character and heritage; retain vital light-industrial areas and small businesses, and protect waterways, essential urban bushland, and green corridors. **Turrella** has a many light industries that will be negatively affected by medium and high density residential development

under the TOD. The Programs do not explain how increasing density will maintain the suburban character and heritage, retain vital light industrial areas and small businesses, and protect waterways and critical urban bushland and green corridors.

Turrella light industry: The light industrial businesses that currently occupy the low-lying areas around **Turrella** station provide local people with local jobs and enable residents to readily access trades, goods, and services. This is vitally important to the diversity of the area. These small, low-impact industries are also suitable for navigating the narrow, winding streets around the Turrella cul-de-sac and are resilient enough to deal with the regular flooding of Wolli Creek. Rezoning this area from light industrial to Tier 2 TOD residential only will reduce diversity, as the suburbs will be reduced solely to residents travelling in and out to get to work, school and study. Replacing efficient small factories with shop-top flats, coffee shops, barbers and beauty salons will reduce the trade-skills-based population of the area that we value and need.

7. Protect waterways and green corridors:

The Programs provides scant information on how development will maintain the waterways and green corridors that are so important to any thriving community. Amazing work has been done over decades by our community to save the bushland and put the M5 Motorway underground instead of through the middle of the valley and create the Wolli Creek Regional Park. Many residents volunteer their time to regenerate the bushland and waterways. It is contradictory for the NSW government to preserve and fund the natural beauty and heritage of the area and then apply a blanket rezoning policy for the adjoining areas. Our community wants NSW Planning to specifically consider the area for its unique values and assets – its waterways, bushland, wildlife, and community action to maintain it - as a special place to live and work. NSW Planning needs to work with the community to develop the area in a sustainable way.

8. Affordable housing:

This is a vital component of any housing policy re-think yet is given little consideration in the Department of Planning documents. We support affordable housing but the proposed infill housing bonus of just 2 percent is completely inadequate in light of the aims and scale of the TOD and DAWLH Programs for affordability, diversity, liveability, and a sense of community.

We consider that providing new affordable housing by allowing developers to add additional storeys to their residential flats is simplistic and not good practice. The local communities and councils can offer ideas for incentivising developers that work for the existing residents and the people who need affordable housing without simply increasing the height of new developments.

In summary, we are against this rushed, cookie-cutter approach to planning, arbitrarily zoning areas as suitable for multi-dwelling, mid-rise and high-rise housing, without consultation with councils and communities, and without consideration of the particular characteristics of these areas.