

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

**Organisation:** STEP Inc

**Date Received:** 28 March 2024

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## STEP Inc

Community-based Environmental Conservation since 1978

28 March 2024

Ms Sue Higginson MLC

Chair

Portfolio Committee No. 7 – Planning and Environment Development of the Transport Oriented Development

Dear Ms Higginson

**Re: Parliamentary Inquiry into the development of the Transport Oriented Development Program**

STEP Inc is a local community-based environmental group, with a membership of over 550 in the Hornsby/Ku-ring-gai area. Our main objective is to preserve natural bushland in northern Sydney from alienation or degradation and ensure proper management of this bushland including ensuring its role as habitat for animal species. Our group has considerable experience and expertise in environmental issues and regenerating and preserving natural bushland and native vegetation.

Thank you for the opportunity to comment on the process of development of the Transport Oriented Development Program (TOD) as this has been denied until now for communities that will be significantly affected by the proposals. We hope that the Government will take notice of the views of citizens as expressed to this Inquiry and make changes to prevent the detrimental impacts that have been widely expressed.

In relation to the Terms of Reference, we will only comment on the TOD as it applies to the station precincts in our area, namely the Gordon, Killara, Lindfield and Roseville stations, that we will refer to as the TOD stations.

We will comment briefly on a selection of the Terms of Reference below.

**a) The analysis, identification or selection process undertaken by the Government, Premier's Department, Cabinet office or Department of Planning, Housing and Infrastructure (DPHI).**

There are many aspects of the locations of chosen TOD stations that indicates that the selection process was rushed and inadequate:

- 1. Lack of existing infrastructure.** The SEPP has the following statement: "This means that more people will be able to live within walking distance of supermarkets, restaurants and open space and be near good public transport to get them where they need to go." There is **no** supermarket within 400m of Killara and Roseville stations. The hilly topography means there is limited open space. There is plenty of bushland but that doesn't help with providing sporting fields and general open space.

This issue indicates that a simplistic analysis has been undertaken by the Government bodies that has not considered fundamental characteristics of the TOD station locations. The number of new

residents that are to be accommodated over the next 5 years as advised by the government will exceed the capacity of existing infrastructure and there are no plans to increase these facilities.

- 2. Congestion from lack of major roads.** It appears the major reason for the TOD station selection was that the train trip for commuters to the Sydney city takes less than 30 minutes. Do they know what proportion of the population use the trainline? The major transport routes, the train line and Pacific Highway, run along a ridge. The topography falls away to the east and west, particularly to the west down to the Lane Cove River. A significant proportion of travel to and from this area is going to areas to the north and south, where train travel is not an option. The only main northbound roads are Mona Vale Road in Pymble and Boundary Road to the south of Roseville. The only main southbound road is Lane Cove/ Mona Vale Road plus the minor (1 lane each way) Mowbray Road. All these roads are a long way from the TOD stations. In other words there are no major north and south routes within the TOD station strip. Access to these roads is via the Pacific Highway or steep and convoluted suburban streets, especially to the south. These roads and the Pacific Highway are already highly congested so buses get caught up in the traffic jams. The opening of the Metro and Western Harbour Tunnel is not going to make any difference to this situation.

The extra population from the TOD developments will make the Pacific Highway and access to the radiating roads impossibly congested. The topography means that there is no easy or inexpensive solution

- 3. Water management.** As explained above the TOD stations are on a ridge. Land to the north and south is steep and contains many creeklines that lead down to the Lane Cove River and Middle Harbour. These creeklines are already suffering from acute erosion from the uncontrolled volumes of water that enter during storms and prolonged rainfall events. The water volumes are only going to become greater with climate change and with the increased development and associated hard surfaces. We are already seeing significant damage to bushland, such as felling of undermined trees, pollution and weed infestations.

Additional expensive stormwater management infrastructure will be required.

- 4. Impacts on bushland and wildlife.** There is already a high level of development in the vicinity of the TOD stations. Many trees have already been lost along the Pacific Highway ridge. Many of the trees constitute species that are part of critically endangered ecological communities (EEC) such as Blue Gum High Forest. These ecological communities are at risk of extinction. The intensity of development proposed for the TOD stations will destroy a large number of these trees and will threaten the survival of these EECs. These trees are also essential for the survival of birds and other wildlife. Birds will lose places to shelter, nest and feed if their ability to survive is curtailed by the presence of a wall of development along the top of the ridge. The developments will also disrupt normal seasonal movement patterns for migratory birds that involve flights from north to south in spring and vice versa. The extra light emanating from the buildings will disturb the nocturnal activity of wildlife.

The Ku-ring-gai Flying Fox Reserve is on the edge of the proposed TOD region in Gordon. The extra development will disturb this nationally significant breeding camp for the Grey-headed Flying-fox, a species listed as vulnerable under both NSW and Commonwealth legislation. Grey-headed flying foxes play an important role in the survival and regeneration of NSW's eucalypt species.

The TOD proposals go against the Government's own legislation such as the EPA Act objective of protecting the environment and conserving threatened species and policies such as the tree canopy objectives and climate change strategy to reduce the heat island effect.

All the issues outlined above have not been considered in the selection of the TOD stations. They could be alleviated if the local council retains the normal housing strategy development and control powers and can have a say on where this extra mid-rise housing is located.

**c) The development of the Transport Oriented Development Program policy approach by the Government**

As pointed out throughout this submission many government policies have been ignored in development of the TOD proposals. It is wrong to be rushing through these proposals that will have such a significant outcome for the people of Sydney with no opportunity for input from the community and local councils.

**i) The heritage concerns with the TOD Program including but not limited to the concerns of the Heritage Council.**

As many other submissions have highlighted, particularly from Ku-ring-gai Council, significant parts of the areas within 400m of the TOD stations are heritage conservation areas and contain beautiful heritage houses that would be destroyed under the non-refusal standards. It would be a tragedy to lose this irreplaceable heritage of national significance

**j) the enabling infrastructure capacity for every station selected or considered as part of the TOD Program**

See points 1 and 2 above

**k) the impact on localised environment and amenity values caused by the TOD Program**

**and o) the impacts of the Diverse and Well Located Homes process and program**

The TOD Program in addition to the Low and Mid-rise Housing proposals that will be imposed on all areas within 800m of transport locations on a one-size-fits-all basis and will lead to a huge loss of tree canopy plus many other issues as outlined above that will harm the amenity of residents.

The SEPP controls will abandon the protection of Ku-ring-gai's significant trees, urban bushland, wildlife corridors and outstanding biodiversity. This environment is an asset for the whole of Sydney, not just local residents.

**Conclusion**

These proposals are a knee jerk reaction to a housing shortfall brought about by an extreme level of population growth in recent years. We are being told by the federal government that is a short term situation. We must not let this situation destroy Sydney. Other famous cities such as Paris and London are preserving their built and natural heritage for future generations. Why can't we?

Local councils and communities must be able to develop housing strategies that aim to meet the required housing targets over the long term and take into account legislation, local conditions and the preservation of our environment that is essential for our wellbeing.

Yours sincerely

Jill Green  
President