

**Submission
No 184**

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

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Submission to Legislative Council Enquiry into NSW Transport Oriented Development plans
28 March 2024

I am a resident of Gordon, living only just within the 400 metre circle drawn around Gordon station.

I recognise the need for more housing to be built in NSW, and specifically in Sydney. I also recognise that in many parts of Sydney the major need is for **affordable** housing to be built, so that lower income people working in those areas are not required to make multi-hour commutes.

Since the news of the TOD plan, I have been inundated with developer letters and emails suggesting I sell my home to them. It is clear from these that there are problems with the current TOD proposals, which will tend to prevent achieving its objectives.

I urge the Enquiry to propose changes to the current TOD plan, to eliminate the following problems:

1. If the minimum 6-story block size is one home, then just one person selling can wreck the amenity for many others around. There should be a minimum development land size, and for 6 story developments this should be at least 2000 square meters.
2. A substantial tree coverage is essential for controlling heat (and energy usage) in an area. The TOD should not allow to removal of most trees on a block in order to develop. At present it allows removal of all but 7% of trees; and even then it suggests that during construction trees can be removed provided they are replaced after – but a large fully grown tree cannot be replaced in under 10 years, making this a somewhat fraudulent provision. There should be a substantial requirement to preserve existing fully grown trees.
3. The types of developments being foreshadowed by developers are not accessible for lower income people – they are a continuation of the high standard/high cost luxury apartments currently being built through Ku ring gai.
4. Some of the areas included in the 400 metre circle have substantial heritage value, with homes over 100 years old and still maintained to a very high standard. Particularly on the perimeters of the proposed zone, heritage values should rate very highly in the development application process, as a non-matching development made right on the 400m perimeter will not only affect heritage inside the perimeter, but also heritage areas and items for a considerable distance adjoining and outside that perimeter
5. Development codes inside the 400m should still require substantial and appropriate set-back and floor to land area ratios. These developments may last for 3 or more decades, and require adequate sunshine, light, walking and sitting space. This is not currently a clear requirement.
6. The TOD is being introduced very quickly on the development side. However the state government has not made the appropriate plans and commitments to allow for an influx of residents to these areas. This covers items such as schools, hospitals, clinical requirements, roads, drainage, sewerage, etc. Development should not proceed until these necessary requirements from the state government are included and budgeted for in the development plans.
7. There has been no opportunity for community consultation on the TOD. As a result there will inevitably be bad unforeseen circumstances. This is a major change to Sydney housing, and needs to be done correctly in order for it to work. While public consultation would inevitably bring out a lot of NIMBYism, it would also bring out many problems that the closed-shop TOD authors cannot have considered, and enable those problems to be solved before it's too late. I urge the Enquiry to require a proper Public Consultation process for this change, even if time-limited.

I repeat my opening statement – I recognise the need to build more homes in Sydney, especially at affordable prices for lower-paid residents. The transport facilities on the North Shore line need to be used extensively as part of this. However the current TOD proposal has too many problems to proceed in its current form, and there will inevitably be others not yet identified. Solutions to those problems (and other identified in consultation) should be incorporated in an amended TOD proposal.

Yours sincerely

Stuart Rodger