

**Submission  
No 198**

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

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## Inquiry into the development of the Transport Oriented Development Program

Thank you for the opportunity to address concerns about the TOD program.

My comments are mostly related to Tier 2 of the TOD Program and to the Inner West LGA. I live in Marrickville close to Marrickville Station and am impacted by the TOD. As a long term resident, (38 years) I am concerned that these proposals will demolish the Marrickville that we love to live in and people love to visit & nominated by Time Out Magazine as one of the 10 "coolest neighbourhood" in the world. People come here because they like the old houses and gritty character of the old shops.

I understand the housing crisis & the obstacles for first home buyers, having gone house hunting with my son & that young people have great difficulty saving to buy even the most modest home. I do understand that there is a shortage of rentals at affordable prices from the media and hearing many horror stories from people, young & old regarding their shocking rent increases & I can see the increasing problem of homelessness on the streets and in many parks, however I do not think that the TOD will fix the housing crisis. The proposal will not provide cheaper homes to buy or reduced rentals, in fact it may exacerbate these problems.

Councils, joint regional organisations, community groups and individual residents are calling on the NSW Government to withdraw the one size fits all TOD & Low to Mid Rise Housing SEPP and return planning powers to local Government..

## Addressing the Terms of Reference

- 1. That Portfolio Committee no 7- Planning & Environment inquire into and report on the development of the Transport Oriented Development Program (TOD) , and in particular**
  - (a) the analysis, identification or selection undertaken by the Government, the Premier's Department, The Cabinet Office or the Department of Planning, Housing & Infrastructure (Department)into:**
    - (1.) the 8 TOD accelerated precincts**
    - (11.) the 31 TOD precincts where State Environmental Planning Policy (SEPP) applies**
    - (111.) any of the 305 Sydney trains, Sydney Metro & Intercity stations within the Six Cities Region which were considered as part of any of the TOD Program locations.**

Questions need to be asked & Government should release the criteria used & the justification for selection of well located transport hubs identified in the TOD Tier 2.

Communities need more than a station and infrastructure needs such as schools, hospitals, child care, aged care & mental health services, libraries & community facilities, open space & sporting facilities, utilities & ageing infrastructure needs to be taken into consideration as do roads, traffic, parking & alternative public transport, topography, tree canopy, street layouts around stations, current heat banks & impacts of climate change. also need to be considered.

The Inner West/Inner south West of Sydney will be greatly impacted by the TOD. There are 10 out of 18 Tier 2 TOD targeted stations from Ashfield to Berala & North Strathfield & Marrickville to Wiley Park. This corridor, with significant built heritage, is already densely populated compared to the rest of Sydney. House and land prices are already high & premium prices paid by developers will further inflate them. The area is ranked 16/29 for green cover compared to similar places across Australia.

Inner West Council analysis estimate that 75-80% of the LGA is affected by the DWLH (Diverse & Well Located Housing) & TOD. The Inner West has the 4th highest dwelling density in NSW, despite the fact that large areas are still Industrial / employment lands and that large swathes of the area are flood affected and impacted by high Aircraft noise exposure and Airport Obstacle Limitation Surfaces. The impact of the combined proposals will be significant due to the Inner Wests: \* compact urban form, \* transport infrastructure (heavy & light rail) and \* network of village

style town centres with 27 suburbs in the Inner West LGA. The above factors have not been considered in the one size fits all blanket plan and the area of applicability is a flaw of the “reforms”.

Why not choose precincts that are supportive of development, lack significant heritage & other constraints and are already more affordable? This could create thriving places, rather than destroying already vibrant thriving places like Marrickville voted one of the “coolest” neighbourhoods in the world by Time Out Magazine.

**(b) the probity measures put in place by the Government, the Premier’s Department, The Cabinet Office & the Department.**

The Government, Premier’s Department, Cabinet Office & have failed to put adequate probity in place. Where are the details & how do they compare with other major planning proposals? Why was the TOD SEPP released on December 18 when it was obvious that Councils would have minimal capacity to respond?

Why was it a summary document for information only & not on public exhibition

What was the process for recruiting community groups and peak organisations in the early consultation phase, who chose them & what was discussed?

How did this consultation shape the TOD station selection?

Why was the community not given any opportunity to respond? This is undemocratic & unacceptable, What was the justification for this?

What involvement did developer lobby groups have in formulating the TOD plans?

It is most unfortunate that NSW Parliamentary Department of Planning productivity probity & policy independent advisory committee was dissolved in April 2023. One recommendation for your committee could be to reinstate this most important committee.

**(c) the development of the TOD Program policy approach by the Government.**

The TOD policy appears to be written by developers for developers.

A document produced by the Committee for Sydney appears to have been used for the development of the TOD. The proposals seem tailored to benefit developers, investors and large property holders. The proposals present a chance for them to make windfall profits while offering nothing for the homeless & those on Public Housing waiting lists and does not prioritising the needs of the community. A 2% requirement for affordable housing will do little to improve the provision of affordable housing for key workers.

It's also been suggested that The Premier and Planning Minister met and consulted with many developer and developer lobby groups, but no Community groups. What involvement did the developer lobby groups have in formulating these plans?

**(d) consultation undertaken with councils, joint regional organisations & communities during the preparation of the TOD Program State Environmental Planning Policy.**

**(e) ongoing opportunities for review and input by councils, joint regional organisations and communities, including consultation with renters, key workers and young people needing affordable housing in relation to the TOD Program State Environmental Planning Policy**

**(f) information control protocols relating to the TOD Program State Environmental Planning Policy**

There appears to be very little consultation with councils & peak bodies prior to the documents release in December and although Councils were invited to give feedback by 31 January, due to Council recess period in January the submissions for TOD could not be made in time. Councils and communities appear to be taken by surprise by the release of these overstretching plans

Removing the Councils from the decision making process, bypassing the Local Environment Plans & DCPs, stripping councils of development controls, altering height & FSRs, implementing a

“consent permissibility” condition, along with the absence of minimum block size requirement and a range of “non refusal development standards,” only applying a 2% affordable housing contribution, (overriding 15% in Inner West) & overriding Council Work done on planning for major developments across LGA’s signify a significant departure from current policy. Councils obviously were not consulted on any of these issues.

The Department of Planning only recently met individually with every Council, both staff & elected Councillors which was after their “consultation” period had expired. These presentations were of 1 or 1/2 hour duration which was completely inadequate for the scale of the proposals and the impact it will have.

In fact the consultative process of the TOD has been totally inadequate & has been so compromised that the whole process should be halted until there is a probity review.

The fact that the proposals will override LEPs & DVPs is extremely concerning.

Given the far-reaching implications of the TOD proposals the level of consultation is critically inadequate.

Why have these policies not been introduced as a Parliamentary Bill to be debated in Parliament?

The time frame for implementation is unrealistic and unreasonable and far too rushed. The initial proposal was for the TOD SEPP to “take effect” was to be April 1 and the end of June for the DWLH. This timeline provides no time for Councils to update their planning systems and to begin preparations for any amendments needed to its planning strategies, such as their LEP or DCPs where the proposals are inconsistent with existing controls.

Who will pay for the implementation and increased local infrastructure costs of these proposals?

Only \$520m has been set aside to address local infrastructure affects across 31 TOD Tier 2 stations. Will not go far considering the extent of the proposals & the number of Local Councils involved. Where’s the funding for school upgrades, hospitals, expanded open space and sporting facilities, libraries, active cycle ways, increased tree canopy, child care, aged care, roads **and** ageing, utilities for water, electricity & waste water that will not cope with increased densities.

The fact is that many of the costs will need to be covered by councils already struggling to provide for current populations & community needs.

#### **(g) property disclosure requirements and management**

Land Banking is of particular concern and needs to be exposed. There has been a lot of land banking along the South West Metro since the Sydenham to Bankstown Urban Renewal Proposal. It is imperative that all property ownership disclosures are accurate and transparent considering the unethical and illegal previous politician & developer arrangements. Considering the scale of the proposals, there is a great need to manage all disclosures and monitor disclosures carefully. The current requirements & management of TOD proposal are grossly insufficient. Who will do this and who will pay? State or local councils?

#### **(h) the release of information prior to the official publication of the TOD Program State Environmental Planning Policy**

On reflection there were items in the Sydney Morning Herald to soften the public opinion on these proposals. These leaks need investigating.

Interesting also to note that the developers knew what was happening before councils and community and were establishing developer companies in December and started to target residents living near TOD stations, to persuade them to sell their properties to the developer. Living in a targeted area letters come regularly from developers, real estate agents with interesting offers to sell & then you can rent from them for a few years before you have to leave and from “friendly people” waiting to help you to negotiate to sell your home to a developer.

Not so sure that all the information given to residents is accurate and the way that they “buy” your property needs to have clearer guidelines. They should buy outright rather than giving you a deposit and finalising the sale some years later when they have their plans approved.

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

The official position of the NSW Office of Environment & Heritage is that Our heritage is valuable & should be protected for future generation: “Heritage includes the places, object & stories that we have inherited from the past & want to protect for future generations. it gives us sense of our history and provides meaningful insights into how earlier generations lived and developed. It also enriches our lives and helps us to understand who we are.”

“Housing & Heritage can co-exist & together will make more liveable city with a definable character.”- National Trust This is very evident when visiting the UK or European cities where there are very strict Heritage Conservation standards and large populations housed.

Worrying statements from the TOD include:

“The changes proposed will result in significant change in these locations as additional housing is delivered” Page 11 TOD Program Official

“The new planning controls will apply in heritage conservation areas. However, a merit based assessment will apply to developments in these locations & relevant heritage controls will apply to the extent that they are not inconsistent with the new standards” Page 11 TOD Program Official

There is no detail on how Heritage will be managed. Who will be determining the merit of a heritage property? Communities are extremely concerned about these statements. They are misleading & suggest that heritage controls can be ignored. if they don't suite development/ developer. Different interpretations will lead to many development disputes, which slow development decisions and legal fees needed for appeals to the Land & Environment Court are costly for Councils

An area the size of Centennial Park of 181 hectares of land containing heritage items will be impacted by the over -reaching TOD scheme,

The National Trust estimates that the TOD will impact on 40 State Listed items and 1,500 locally listed items. This does not take into account the many thousands of beautiful villas, Manor houses, stone houses, period houses, rows of federation workers cottages and streetscapes in suburbs like Marrickville which currently have no Heritage protection. Proposed conservation areas have been put on hold but should be gazetted and also be considered as having merit. There has been a great loss of heritage, houses, shops & churches and it is so important to preserve what little is left.

The housing proposals as presented will result in the greatest level of heritage destruction in NSW, since the Heritage Act of 1977, introduced by the Wran Labor Government. Bulldozing & clear felling streets of heritage houses, replacing them with black and white boxes will extinguish local character of unique suburbs from Nelson Bay to Batemans Bay making them indistinguishable . This loss will be a permanent scar on our states landscape & undermine Heritage legislation & will be unparalleled anywhere in the world. Many in the community see this as wholesale vandalism, which should not be acceptable in a civilised society.

These proposals pose a significant threat to heritage preservation, comparable to the controversial actions of the NSW Askin Government from 1965-75, known for its corrupt dealings with developers. Heritage suburbs with a high percentage of Individual lots in a Conservation area (HCA) or containing listed items, including Killahra, Gordon, Newcastle Interchange, Teralba, Roseville, Lindfield Croydon, Haberfield, Dulwich Hill & Lindfield could be decimated.

The National trust says “ If the proposals being put forward go ahead, previous plans to destroy The Rocks will pale into significance with the scale of the heritage destruction that will be legitimised across NSW.”

The National Trust “Calls on the NSW Government to recognise that heritage is a vital part of their intended desire to create “vibrant, sustainable & liveable communities”

The trust and many concerned residents request that existing heritage controls are maintained & to ensure that new development located in or near heritage items or areas be sensibly planned with sensitivity to the current built form. Manor houses, terraces and six storey units will not be suitable in all zoned areas. The Government hasn't really explained how it is possible to introduce 6 storey buildings into heritage conservation areas, and still retain the historic character of the area which led it to be protected in the first place. While addressing the housing crisis is crucial, a single poorly executed development in a heritage area can undermine its cultural and historical significance for present & future generations.

All Heritage Conservation Areas (HCAs) from Nelson Bay to Batemans Bay ought to be exempt from generic planning approaches and Heritage assessments should be completed & gazetted .in historic precincts such as in Marrickville and Canterbury-Bankstown. Heritage protections must be upheld.

An analysis of Marrickville resident responses from 255 submissions for the Sydenham to Bankstown Urban Renewal Proposal in 2017 indicated that the residents truly value heritage - “Character & Heritage loss” & “Need to Retain Historical Houses”receiving 256 mentions. 245 submissions objected to the proposal. Many respondents indicated that there would be revitalisation, however they asked for “considered planning & “renewal to respect character”. They expressed a “desire for good urban development” & to see a “proposition that embraces intelligent, visionary, planning on a human scale that enhances connectedness & community”. I assume that had the community been consulted, they would have expressed similar viewpoints.

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

Building of new development around existing transport is justified but each area must be considered individually. Drawing 400 metre circles is simplistic & does not reflect sound urban planning. Density could be effectively implemented, but it is essential that the Government collaborate with councils and residents to identify suitable locations to achieve successful urban design for developments that are safe, sustainable & have good amenity.

The area in the immediate vicinity of Marrickville station for example is not suitable for high density. The area floods quite regularly & there is a narrow one way street on the southern side. An application for a 10 storied Boarding House was refused by Council & The Local Planning Authority but this decision was overturned by the Land & Environment Court with an approval for an 8 storied building. There is no safe place to collect waste. Regular sized waste collection vehicles cannot fit in the narrow lane and more smaller vehicles will have to stop regularly in a No Stopping Zone. The site is impacted by aircraft noise, ANEF of 25-30 and the site impacted by noise from the the busy Illawarra Rd & trains both suburban and freight that run 24/7. There is no on street parking and traffic congestion already a problem with drop offs & collection of passengers. Although the developer would describe the building as providing Affordable Housing the rents will be lower because the units will be extremely small.

There is a high percentage of small lots in the Inner West (60% are less than 300m2) and there is a densely packed urban layout with narrow streets which is a major constraint. Negotiating with neighbours to sell as a street has proven to be distressing for many long term residents

Each station will have its own unique topography & constraints and will need place based planning.

#### **(o) the impacts of the proposed Diverse & Well-Located Homes process & program**

While acknowledging the pressing need for increasing housing supply & improved accessibility to quality affordable housing, as well as the urgent requirement for public housing and a shift from urban infill over greenfield developments. City of Sydney argues that there should not be 6 storey development on narrow streets and I would agree with their stance.

I believe that the TOD & the DWLH proposals are not the most effective solution to address the housing crisis and may in fact exacerbate the situation.

The proposals, lack specific mechanisms or safeguards to achieve the purported objectives of enhancing housing supply, affordability, diversity, choice and fostering vibrant local communities, with potential adverse effects in some instances.

The proposals lack a guarantee to enhance the affordability of purchasing or renting properties as the TOD only includes a 2% requirement for affordable rentals near stations and do not clearly outline mandates in the DWLH. The Government needs to get serious and introduce mandates such as those in London where 35-maximum 50% for "inclusionary /social housing" be included in all new developments.

It is alarming that the destruction of boarding houses, group homes, older blocks of units & houses and shop top housing which currently offers lower rental rates will result in a great loss of existing affordable housing around Marrickville Station. It is important to note that the Inner West has the second highest number of boarding houses in the state, second only to the City of Sydney LGA. Many of these people will be made homeless & unable to pay rents in newer style costly boarding houses. The plans will force them out of their homes and the communities where they are supported. An immediate audit of Boarding houses dwelling numbers in targeted areas is essential to prevent the predicted overall decrease in current affordable rental. A strategy to re house these current residents needs to be developed, otherwise there will be many more people sleeping rough on the streets.

I fear that the proposals will further inflate the costs for first home owners in the near future. The City of Sydney has expressed concern that the cost of land will increase. Young people already compete with each other, Bank of Mum & Dad purchasers & investors both local and foreign. They will now have to also compete with developers. land bankers and cashed up sellers.

Traffic & parking is already a daily nightmare in the streets around Marrickville Station. It cannot be assumed that because you live next to a station you will not own a car. Sydneysider households own many cars own many cars and they are getting bigger & taking up more space on the street. With gentrification, residents often have a family car and work car, with more adult children living at home longer, households may have up to 5 cars or more and in shared rental houses there can be many cars. The prevalence of multiple vehicles per household compounds the parking issues. Maximum (minimal parking allocations fail to address the actual car ownership needs of residents. The .5 allocation is not an adequate parking provision and discriminates against families. & people with mobility issues, needing cars to transport wheelchairs.

While Marrickville residents utilise public transport well, the extent of car usage across Sydney according to NRMA research is contingent on their workplace location. Those working in the city are more inclined to use public transport, whereas , individuals working in suburban areas drive their cars due to the paucity of cross city public transport and changes required.

People who purchase units without parking should sign a legally binding agreement that they or their tenants will not own a car.

The proposed initiatives are expected to have a significant impact on 75-80% of the inner West LGA, leading to a notable decline in the character, heritage, and overall quality of life. Currently the Inner West boasts a diverse mix of housing options, with only 27% consisting of detached houses, 41% medium density and 30 % high rise. Increasing the mid and high rise as recommended in the proposals will actually reduce the diversity of housing choice.

The Inner West has consistently met or surpassed housing targets, with numerous approved DAs waiting to be constructed to address the growing demand. Specific locations, such as Victoria Rd precinct in Marrickville featuring many 11 storey apartment blocks, Station St with an 8 storied

Boarding House and Illawarra Rd 6 storied Serviced appartments to name a few. These and many others across the LGA should be completed before considering the TOD & DWLH.

There also need s to be an audit of all Zombi DA's, submitted & approved years ago but not followed through. There are many holes in the ground all over Sydney that have been sitting for years, with the developers waiting for the right time to build to reduce costs and maximise their profits. If all the DAs were to be fast tracked from Nelson Bay to Batemans Bay there may not be a need for these proposals and clear felling suburbs around railway stations.. Why isn't the State Government taking more action to get these Zombi D'as moving into production.

No Housing targets have been included in the proposals. New housing targets in line with the National Housing Accord Requirements need to be provided so that Councils are given the opportunity to develop Council led Transport & Diverse & Well Located Housing delivery plans.

#### **(k) the impact of localised environment value caused by the TOD**

There is a paucity of open space in the Inner West and Council does not have the financial resources to purchase land to make more open space. There's the problem of availability and the high cost of land in the LGA. This lack of open space was exacerbated during the Covid Pandemic when the the Cooks River walking/cycling track was over crowded and the Wolli Creek walking track, trampled through overuse. Open space is needed for the well being of the community and developers must contribute more to facilitate purchase open space.

Such extensive development will have a major impact on the Cooks River. With the increase in hard surfaces there will be a greater volume of stormwater run off, increasing localised flooding and pollution in the river and outlets to the sea which will compromise beach water quality and health of those participating in water sports. This will be a major problem from Nelsons Bay to Batemans Bay.

Climate change has not been factored into either of the Proposals. It is not sustainable to demolish so many thousands of houses and unit blocks. Where will all this rubble go with diminishing sites for landfill? Massive new areas will needed for additional landfill. Concrete is a major Carbon emitter & will diminish any plans for zero or lowered emissions & dramatically Increase emissions. Re-use and adaptation of older buildings should be encouraged.

Loss of current tree canopy, gardens, verges, deep soil and reduction in deep soil requirements will all have a negative impact on air quality, heat production, loss of biodiversity and amenity. Massive land clearing up and down the coast will create habitat fragmentation loss and biodiversity loss and drive up carbon emissions.

The Urban Heat Bank maps indicate that the Marrickville area already has large expanses of land in the red zone. These maps need to be studied before higher densities, without tress are imposed.

Sea levels are rising and higher tidal surges predicted and should be taken into account when planning where development goes. Higher densities should be banned in all areas close to rivers and the coastline.

The Plans and introduction for both programs have ben rushed and not planned for sustainability. Buildings need to have good design, be well insulated and powered by renewable energy. Solar rooftops for gardens should be mandatory as well as community batteries and EV charging points. There is very little detail but there should be controls to reduce energy consumption in multi-storey buildings which require more energy for lifts, air conditioning & clothes dryers. Basic needs of light, good ventilation and homes that are not overshadowed and mould free are needed and the City of Sydney Council has expressed grave concerns regarding the loss of these considering the changes to Apartment design standards.



## **(r) any other related matters**

I believe that both programs have little chance of improving the “housing crisis” and may exacerbate it. Our constantly growing population will continue to exert pressure on NSW housing supply. The proposals are both being mandated from top down and the one size fits all from Nelson bay to Batemans Bay with a singular objective to boost housing supply to reduce rents and make housing more affordable simply won't work.

These ‘Reforms’ are poorly researched, not evidence based, far too rushed and need substantial change through Local Government and Community consultation to try to achieve the intended aims. Many other factors need to be considered.

In time they would increase supply but supply could be dramatically increased rapidly through, completion of all current approved DAs. without demolishing heritage and unique ,character rich suburbs over an extensive area of the NSW Coast.

Supply is not the only answer. We must realistically address the misconception that an increase in supply will lead to lower house prices or rentals. These measures are highly unlikely to drive down the price of houses or rents. Take the suburb of Zetland an old industrial Sydney suburb, which saw a staggering 2,700% increase in housing supply over twenty years. Despite this the median house price was \$2,145,000 with a 2 bed unit priced at \$1,005,000 (data from [realestate.com.au](http://realestate.com.au) 2017) & probably much higher now. Similarly, a rise in supply due to apartment developments in Marrickville has resulted in elevated prices for house & unit sales & rentals. With gentrification there will be no going back to reduced prices.

There is nothing in the proposals that guarantees increased & more speedy supply, it is highly unlikely the supply objectives will be realised. The TOD documents estimating that only about 10% of housing targets will be met in the first 5 years. There's, problems of building material supplies, shortages of qualified trades people and the fact that the proposals are entirely dependent on residents selling the homes that they have saved for & love to a developer to demolish!

The City of Sydney Council warns that the proposals will lead to conflict and appeals and slow down the delivery of housing and lead to poor outcomes for communities.

While there is no compulsory acquisition, residents may find it impossible to remain in their single storied homes if neighbouring properties are sold & replaced with 6 or 8 storied blocks. The uncertainty surrounding the proposals has caused distress as residents long term and newer grapple with the prospect of difficult negotiations with their neighbours & developers when selling their homes & uncertainty about where they will be able to live in the future. Their choices will not be diversified but reduced to apartment or apartment. The developers are already active and applying some pressure on households near the stations. These pressures and negotiations can be be extremely divisive in neighbourhoods and can fracture communities. People living on the Southwest Metro have already experienced round 1 of these difficult negotiations and do not look forward to subsequent rounds.

Sydney is a city renowned for its vibrant mix of unique suburbs, each with its own cultural & historical significance, faces a threat to its diversity due to these proposals and ‘pattern book’ development controls. These will lead to a homogenised urban landscape spanning from the Hunter to the Shoalhaven, sacrificing historical architectural excellence & character. The quality of new cookie-cutter developments will reduce housing diversity.

Local communities like Marrickville, cherished for their diverse blend of people, of different ethnicities, cultures, gender diversity & from a wide range of socioeconomic backgrounds & the historic architecture of the houses and town centre & independent businesses, face challenges from insensitive development practices that erode the area's unique charm. Everyone would agree that the Town & village centre could do with some TLC, some paint and maintenance and sensitive development in selected places but the TOD would wipe out the diversity & vibrancy. People love to live here & visit and its gritty, diverse, vibrant character has been recognised as one

of the world's coolest neighbourhoods as it is. Developers use images of this coolness extensively in their promotional materials. Upholding architectural integrity and preserving the distinctiveness of local communities are essential for promoting a thriving & diverse urban environment. Embracing the developer driven proposals outlined in the TOD will not foster vibrant communities but lead to their demise.

Concern has been expressed that young people and families are leaving Sydney in droves. These proposals will not stop that flow. Families leave for a better life for their children. To have a bigger house with a garden, within walking distance from a school, open space and community services means that people have to leave the increasingly densified city. Developers only want to build 1 or 2 bedroomed apartments & parking allowances of .5 or zero parking makes life difficult for families. 3 bedroomed units can be more expensive than a house in a change, the cultural richness of neighbourhoods like Marrickville with their diverse dining, music venues, entertainment, breweries and distilleries rejuvenating the former industrial areas, remains suburb or in a thriving country town so moving out for a better life is the choice made.

Higher density, will exacerbate overcrowded schools, increase problems for getting health care when needed, problems getting into sporting teams through lack of grounds, parking problems and traffic jams will not entice families & young people to stay.

It's simplistic to think that knocking down all the old houses and moving on all the old people will increase the supply of housing and solve the housing crisis for young people.

### **In what other ways can we enhance supply & affordability?**

Immediate construction commencement or adherence to set timelines is vital for all approved DAs. Expediting all approved DAs from Nelson Bay to Batemans Bay would significantly boost the housing supply.

Doubling Council rates for empty properties and short term Airbnb could encourage sales of properties as it has done in Canada.

The removal of Incentives that prioritise housing as an investment rather than a living space, such as Negative Gearing and Capital Gains concessions by the Federal Government is imperative. Limiting the number of properties that can be negatively geared would free up homes for first home buyers.

State Government must address the issue of affordable rentals by mandating serious requirements of 35-50% for "inclusionary" or social housing as they have done in London.

Affordable housing allocations should be on site & not as offsets in a less desirable place to live. Specific targets within the Affordable Housing goals should be established for various types of rentals to ensure the preservation & socio-economic diversity, including family dwellings, single occupancy, aged friendly & adaptable housing. Affordable rentals should be secured in perpetuity.

Introducing a mandate for new developments to reserve a percentage of units for genuine first home buyers could help to mitigate competition from local and foreign investors.

The lack of public housing supply is a critical concern. Very little investment has been made over the last 30 years. Both State and Federal Governments must prioritise the construction of more public housing. Maintaining & refurbishing current derelict public housing stock should be prioritised.

Public Housing schemes such as the highly successful Singapore model should be investigated and community Housing Co-operative schemes for purchasing homes investigated and expanded.

Value Capture should be initiated for windfall gains on property sales and this money could go towards social housing. This should however only apply to developers and land bankers and not residents forced to sell their family home.

## **Conclusion**

Addressing the housing crisis does not have to result in the loss of heritage, soul & character of existing suburbs and their diverse communities.

There are numerous alternative sustainable approaches to consider before the degradation of streetscapes, character, amenity, tree canopy, biodiversity, historical aspects of the built environment & compromising the integrity of the diverse and vibrant communities.

The Sydenham to Bankstown Urban Renewal strategy failed to meet the standards of quality planning & community expectations, sparking similar concerns with these flawed proposals.

These proposals will produce an ad-hoc plan of hastily built, mid or high rise structures interspersed with a few one storied residences, void of heritage, tree canopy, well worn parks, traffic jams, streets crammed with parked cars, polluted streams, rivers & beaches, lacking in character, vibrancy & community spirit. Only the affluent will be able to aspire to live in a house with a garden.

The proliferation of substandard apartments today portends a future marred by exorbitant maintenance & strata expenses, an unfortunate reality confronting numerous apartment dwellers already. Adapting Design apartment standards, increasing heights & FSRs & changing the width between buildings will contribute to poor amenity liveability & well being of residents.

The suggested course of action involves retracting the proposals and reinstating planning responsibilities to local councils, empowering them to engage in collaborative consultations with their respective communities for place based strategic urban Master planning.

Councils should be permitted to develop Urban Design Plans tailored to station and town centres, promoting increased housing opportunities, while endeavouring to preserve local heritage & character.

Heather Davie  
Marrickville