

8 March 2024

Ms Sue Higginson, MLC  
Chair, Portfolio Committee No.7 – Planning and Environment  
Parliament House  
Macquarie Street  
SYDNEY NSW 2000

Submission lodged through online portal

Dear Ms Higginson,

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

The National Trust of Australia (NSW) firmly believe that housing and heritage can co-exist in NSW, and together will make for a more liveable city with a definable character, however we are extremely concerned that the current “one-size-fits-all” housing reforms put forward by the NSW Government are the biggest threat to the heritage of NSW that have ever been proposed.

The proposals that are being put forward in the NSW Government’s *Transport Oriented Development Program* and *Diverse and well-located housing reforms* will have a dramatic and permanent effect on the heritage of NSW. These reforms are so wide-ranging in nature that they extend far beyond any requirements to increase the housing of NSW. They will affect all areas of NSW, in particular the Six Cities Region which extends from Bateman’s Bay to Nelson Bay, and west to include the entire Blue Mountains World Heritage Area. They will involve non-refusal standards that turn off planning controls for environment and heritage considerations. This affects, through the Local Environment Plans and Development Control Plans, 43 Local Government Areas, that together contain around 20,000 heritage items - representing almost two-thirds of all heritage listings in NSW.

The National Trust acknowledge the current need to address the housing crisis and note that the provision of transport and other key infrastructure is a vital component of planning which must be undertaken in conjunction with any new housing. The National Trust has calculated however that the *Transport Oriented Development Program* alone will threaten 40 State heritage listed properties and 1,500 locally listed items that are near railway stations.

The National Trust is calling for a more sensible approach to a legitimate problem and seek to highlight the very real unintended consequences of these blanket reforms. We are calling for existing heritage and environmental protections to remain and for heritage to play a role in new development, avoiding unnecessary demolition of many already liveable or adaptable spaces.

We welcome this inquiry into the Transport Oriented Development Program.



The National Trust (NSW) comments on the following terms of reference in the inquiry into the development of the Transport Oriented Development (TOD) Program:

- a) **the analysis, identification or selection undertaken by the Government, the Premier's Department, The Cabinet Office or the Department of Planning, Housing and Infrastructure (Department) into:**
- i. **the eight Transport Oriented Development Program accelerated precincts**
  - ii. **the 31 Transport Oriented Development Program precincts where the Transport Oriented Development Program State Environmental Planning Policy (SEPP) applies**
  - iii. **any of the 305 Sydney Trains, Sydney Metro and Intercity stations within the Six Cities Region which were considered as part of any of the Transport Oriented Development Program locations**

The National Trust notes that the methodology for selecting the stations in the TOD proposal has not been provided by the NSW Government, and the National Trust would call into question the methodology that has been employed in this selection. As noted in the submission by Wollongong Council (which is impacted at Corrimal, North Wollongong, and Dapto stations) *“Council officers were not involved in the selection of the three stations... at this stage the Department has not provided detailed information on the criteria or analysis supporting the selection.”*<sup>1</sup>

The National Trust recommends:

- The building of new development around existing transport may be justified, but each area must be considered individually.
- The NSW Government should release the criteria used and the justification for the selection of “well-located” transport hubs identified in the TOD proposal.
- The NSW Government actively engage with affected local councils to understand the specific issues and previous planning work in each area, including heritage impacts.

The National Trust makes comment on the choice of the following locations as examples:

- Dapto Station is served by trains once every hour in each direction depending on the time of day, with more than 50% of its TOD precinct containing significant flood constraints associated with the Mullet Creek catchment.<sup>2</sup>
- Corrimal Station is disconnected from the Corrimal Town Centre and is served by trains once every hour in each direction depending on the time of day. The Planning Proposal for the former Corrimal Coke Works site (which is now partially State Heritage Listed) has taken many years to implement, and an LEP amendment was finalised in 2022. Council also adopted a Development Control Plan chapter and Planning Agreement to help inform a proposal that responded to the site appropriately.<sup>3</sup> The TOD proposal will override all of this planning.
- Teralba Station is only serviced by two trains each hour, from which it takes 2.5 hours to arrive in Sydney. Teralba Station has no lift access, and its existing platform building was in fact demolished in 2011 and replaced by a simple waiting shed with no facilities. Teralba station is not even 1km distant to Booragul station which is also identified as a “hub”. Lake Macquarie City Council has just spent a number of years on careful engagement with the community in this area to produce the draft Teralba Heritage Conservation Area (HCA). The new HCA highlights Teralba’s unique 19th century mining and railway history, and also took into consideration the North West Catalyst Area that will drive investment and change in the broader North West Growth Area of Lake Macquarie.<sup>4</sup> The changes brought about by the TOD proposal for this area will override all of this previous strategic planning work.

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<sup>1</sup> Wollongong City Council, Ordinary meeting of Council, 5 February 2024

<sup>2</sup> *ibid*

<sup>3</sup> *ibid*

<sup>4</sup> [Revised DCP Controls, Part 11.3 – Heritage Area Plan for the Teralba HCA, FINAL DRAFT June 2021](#)



*Teralba Station with customer facilities in 2006 (left) and with no facilities in 2023 (right). This station, which has no lift access and which is located only 800m from another identified “hub” at Booragul Station (which also has no lift access) has been identified as a “transport hub”.*

Aside from the obvious questions relating to the planning suitability of the selected sites that are affected under the TOD proposal, the National Trust is also of course deeply concerned at the heritage impacts that may or may not have been considered as part of the selection analysis. We outline these concerns further in response to part (i) of this response.

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

It is the opinion of the National Trust that this proposal (in terms of policy) has not been properly considered before being exhibited/implemented. There are a number of examples that would seem to justify this opinion:

- No draft TOD SEPP has been exhibited at any stage, yet according to the [Department’s website](#) from April 2024 it will “*amend planning controls within 400 m of 31 well-located metro and rail stations.*” It is impossible to truly understand the impact of this proposal until it is actually exhibited.
- The only information provided at this stage is the [TOD information book](#) - a 12 page document that is seemingly guiding the rollout of a major change to the NSW planning system.
- The TOD guide states that “*the NSW Government is developing a pattern book of endorsed housing designs for both low-rise and mid-rise (up to six storeys) buildings. Developers who choose to adopt the endorsed pattern book designs will have access to an accelerated approval pathway – meaning builders can get on site faster, and people can move into new homes sooner.*” This [pattern book](#) is still not available from the Government Architect, with an “international design competition” set to be announced in early 2024 yet to be announced, and the first stage of the pattern book expected to be “available for use” in early 2025.
- The TOD guide also notes that although the Apartment Design Guide is the principle guiding document for residential apartment buildings, some “*amended design criteria are proposed that reflect the unique design challenges of mid-rise.*” These changes are outlined in slightly more detail in the *Explanation of Intended Effect: Changes to create low-and mid-rise housing* document. The City of Sydney<sup>5</sup> have noted that “*the proposed FSR of 3:1 for mid-rise developments within 400 metres of stations will almost never fit within the 6-storey buildings described in the EIE. This is the same for the proposed 2:1 and 4 storeys between 400 metres and 800 metres. The City’s testing has demonstrated that the FSR 3:1 and 2:1 FSR standards actually require building height over 6 storeys on smaller sites, and up 30 storeys on larger sites in urban renewal areas such as Green Square where land must be provided for streets and open space. The proposed FSR under the program is inconsistent with the Apartment Design Guide which recommends heights of 9 to 12 storeys to accommodate 3:1.*” The National Trust (along with the City of Sydney) does not support changes to the Apartment Design Guide.

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<sup>5</sup> City of Sydney Submission on the NSW Government Changes to Create Low and Mid-Rise Housing, p.10



**(d) consultations undertaken with councils, joint regional organisations and communities during the preparation of the Transport Oriented Development Program State Environmental Planning Policy; and**

The National Trust of Australia is the oldest and largest independent conservation organisation in Australia. Our Register formed the basis of the current State Heritage Register and the majority of Local Environmental Plan listings in NSW, and since 1945 the New South Wales National Trust has been the leading advocate for the protection of the built and natural heritage in this State.

With over 22,000 members across NSW, our 2,000 volunteers provided 104,800 hours of service to assist us in welcoming over 139,000 visitors to our properties (in 2018–2019). We are the custodian of 35 heritage properties (including the World Heritage Listed Old Government House, Parramatta), care for and conserve natural areas, gardens and more than 60,000 collection items.

Every year we make over 60 submissions to Government to safeguard and protect the built, natural and cultural heritage of New South Wales. We have 12 Board-appointed taskforces and technical committees, which provide professional expertise, technical and specialist advice on matters of advocacy, collection management, curatorial direction, finance, property and cemeteries conservation, and are supported by 29 regional branches and committees, which provide advocacy and fundraising support for the organization in regional areas.

Despite all of this, the National Trust was not consulted during the preparation of the *Transport Oriented Development* SEPP nor were we able to comment, as it was not put on exhibition.

The Trust does acknowledge that it is an invitee to the online monthly “NSW Planning System Stakeholder (Community and Environment)” meetings, and that the Transport Oriented Development Program was raised in this forum, however this does not constitute effective community consultation as it involved no real *input* into the program.

It has not been explained why the SEPP was not advertised for comment. Despite this lack of opportunity, the National Trust chose to comment on the *Transport Oriented Development Program* in conjunction with its submission for the *Low- and mid-rise housing reforms*. We note that:

- the TOD was exhibited over the Christmas period, reducing the ability for community review (even though they could not comment using any organised process)
- by exhibiting over Christmas, this also reduced the professional capacity for many councils to comment as staff were on holidays during this time

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

The National Trust recommends further involvement with all key stakeholders, particularly from Councils and community groups.

Local Governments can effectively identify appropriate areas with both the infrastructure and planning requirements for greater density. Considering the concern raised by dozens of councils and a great many individuals in relation to TOD, it is clear that more authentic professional and community consultation needs to be undertaken.





**i) the heritage concerns with the Transport Oriented Development Program including but not limited to the concerns of the Heritage Council**

The National Trust is extremely concerned by the implications the TOD will have on heritage throughout the affected areas, which will have a devastating and permanent impact on the heritage of NSW.

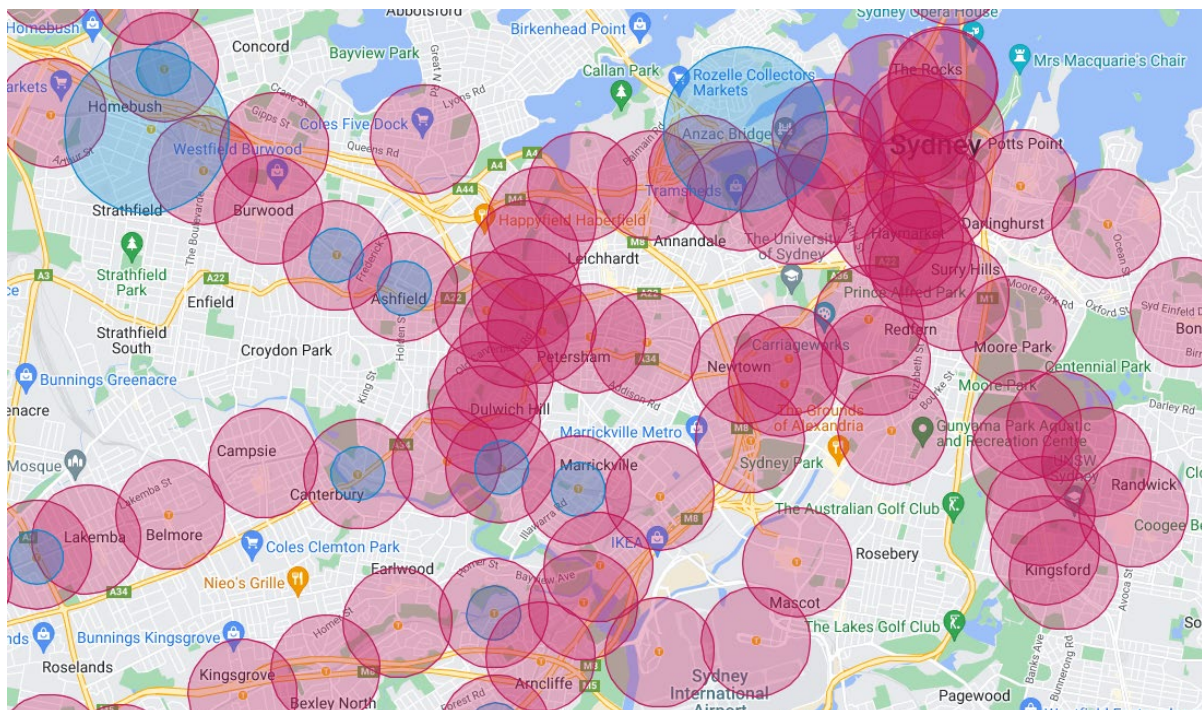
At present, there is a distinct lack of clarity around the proposals, and without any evidence to the contrary the National Trust have had to assume the proposal will indeed deliver the worst-case scenario and that years of established heritage protections will be overridden.

In the recent Budget Estimates Hearing, Kiersten Fishburn (Secretary of the Department of Planning, Housing and Infrastructure) clarified under questioning that the TOD proposal will apply in heritage conservation areas but it would not apply to heritage items. Supplementary to this, in relation to the low- and mid-rise changes, Monica Gibson (Executive Director Department of Planning, Industry and Environment) stated that *“the low- and mid-rise reforms do apply to heritage conservation areas and heritage listings.”* As Scott Farlow MLC pointed out in further questioning, this is in contrast to a statement made by Minister Scully on 30 November 2023 that 30 November that the changes to low- and mid-rise housing would not apply in heritage conservation areas.<sup>6</sup>

**Scale of proposals**

The affected station and town centre precincts are proposed to be within the “Six Cities Region” which covers 1/3 of the NSW coastline, across 43 local government areas. The National Trust has calculated that this will impact 2/3 of the heritage items listed in NSW.

Despite proposing some of the biggest planning reforms ever attempted in NSW, not a single plan has been provided by the NSW Government that shows the extent or scope of these impacts. The National Trust – a community-based charity – have attempted to understand the impacts of these proposals by drawing circles of varying radius around the affected areas.

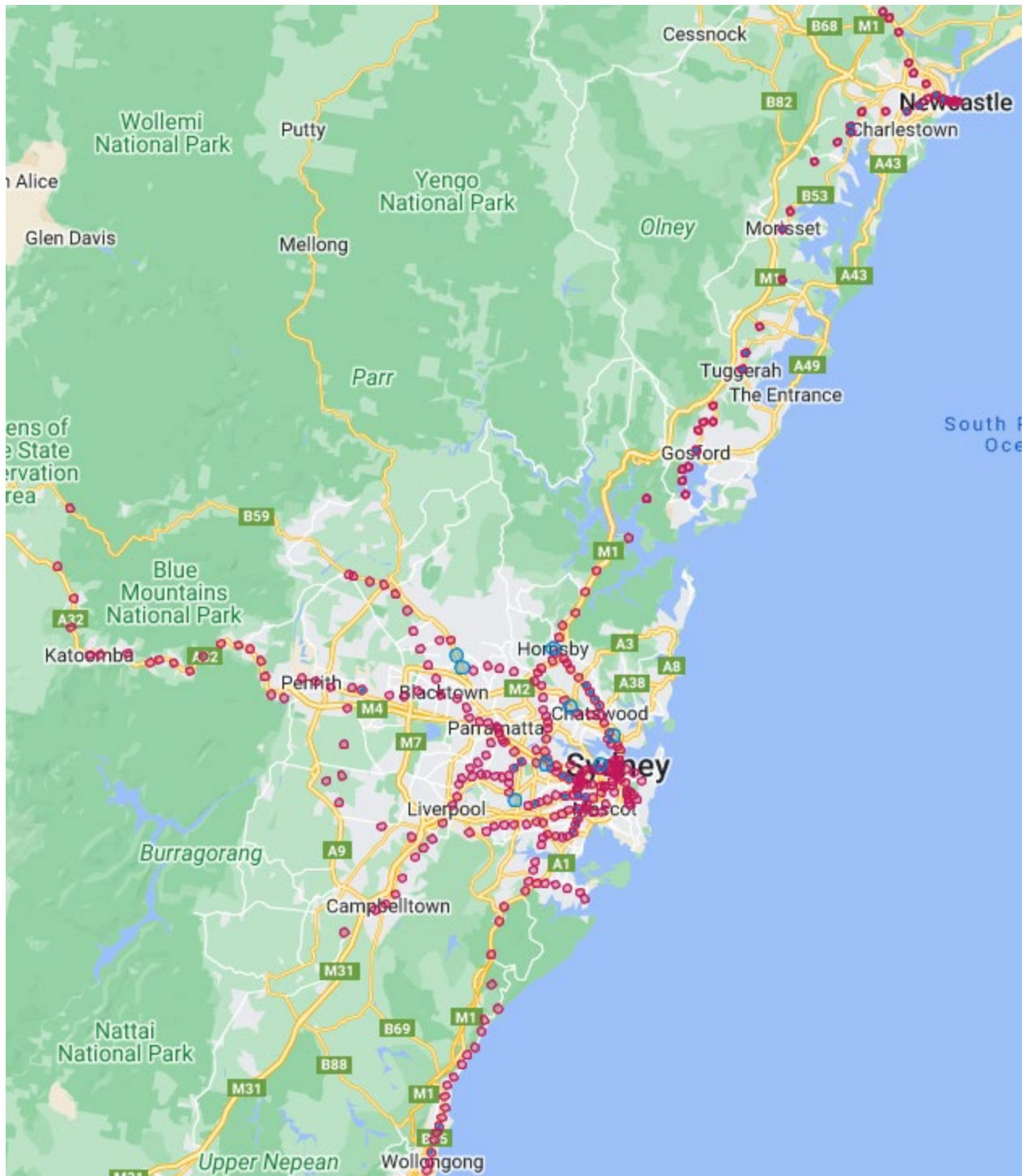


When all of the affected areas in Sydney are overlapped (above), the majority of the city and its inner suburbs will have its planning legislation and heritage protections overridden.

<sup>6</sup> [Portfolio Committee No. 7 – Planning and Environment's additional round of the inquiry into budget estimates 2023-2024, p.72](#)



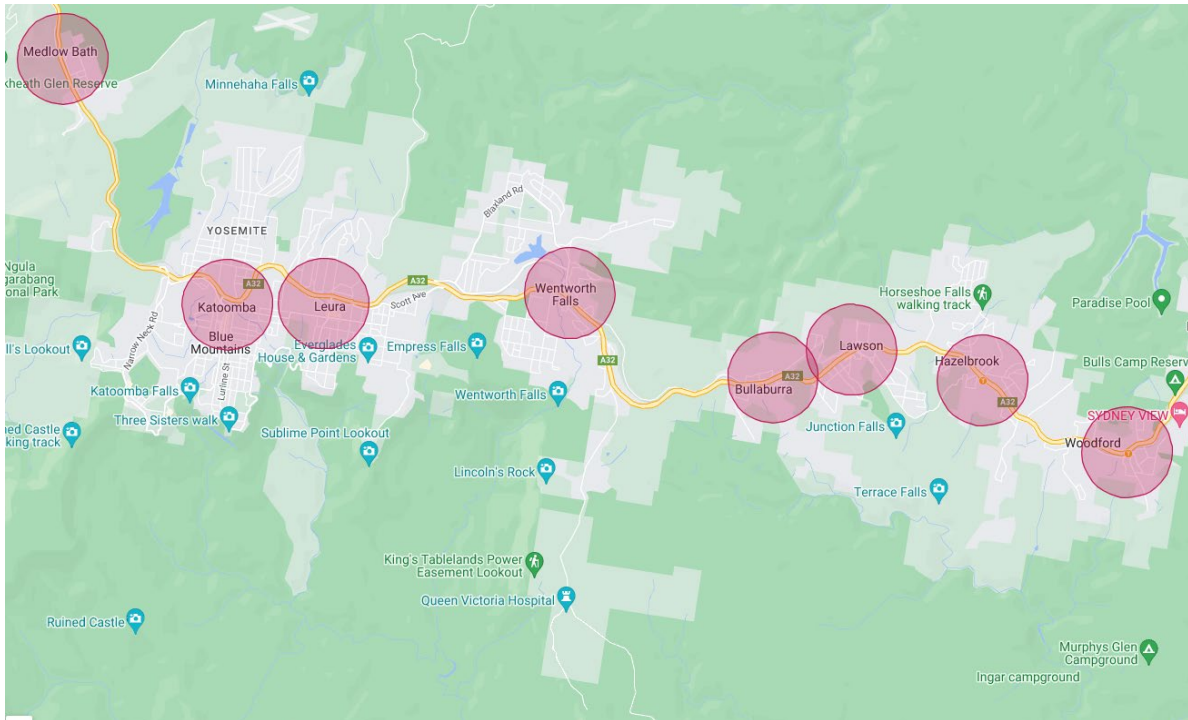
These maps do not contain all “town centres” as this has not been defined in the EIE. The Trust notes that in the recent Budget Estimates hearing (27 February 2024) this had still not been defined and “the Department of planning has not specifically defined what a full-line supermarket would be.”<sup>7</sup>



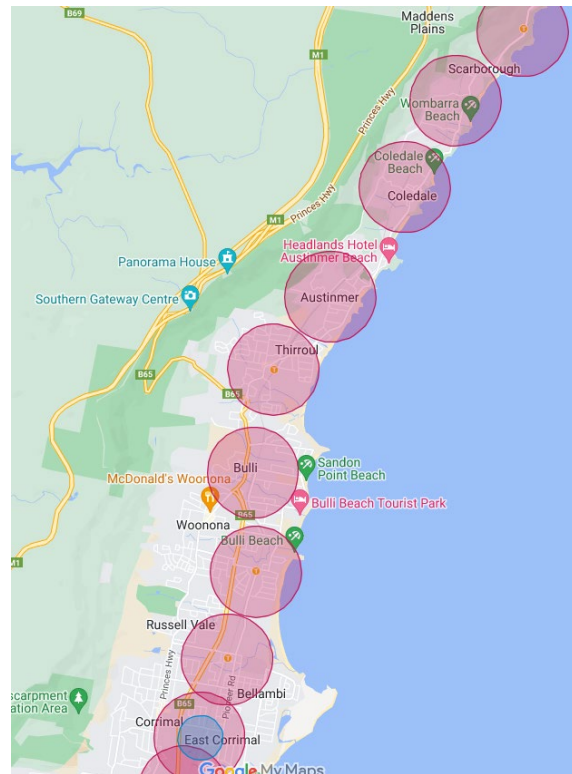
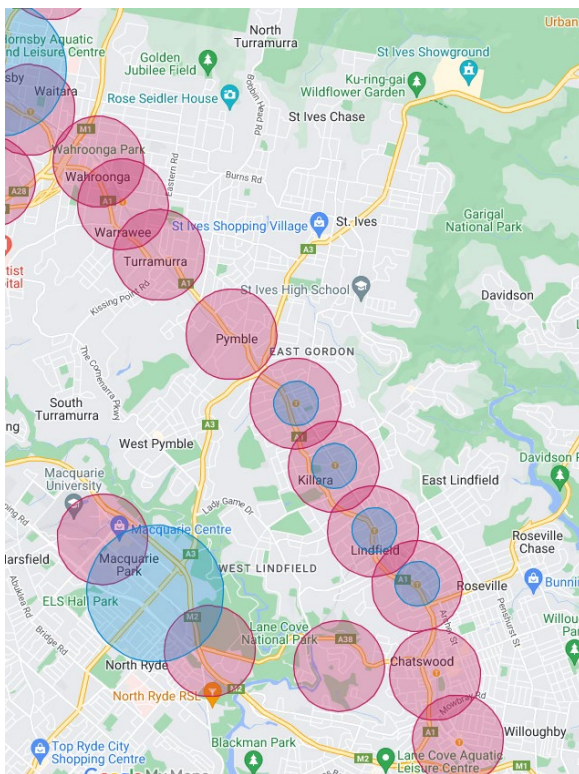
This map shows the radii around railway stations and town centres in NSW. The affected precincts encompass the entire “Six Cities Region” which extends from Bateman’s Bay to Nelson Bay, and all the way across the Blue Mountains World Heritage area to Mount Victoria. The heritage impact of this proposal is unprecedented in its scale and application.

<sup>7</sup> [Portfolio Committee No. 7 – Planning and Environment’s additional round of the inquiry into budget estimates 2023-2024, p.44](#)





The historic villages of the World Heritage Listed Blue Mountains, rich in heritage and each with a unique character, will be almost all completely engulfed around their historic centres which are centred on the railway line. In cases such as Katoomba and Leura, the concentric rings around the station precincts almost join up so as to create a mega-precinct. The train from Katoomba to Central takes approximately 2 hours.



Sydney's North Shore line (left) will become an almost unbroken corridor of development, while the narrow corridor that comprises the string of villages on the south coast of NSW to Wollongong (right) will be heavily impacted.



The Trust note that almost 1500 heritage items are located within the radii prescribed around the selected stations. This does not include the number of items within heritage conservation areas, which would bring the impacted items over 10,000. The number of impacted items in the Bays West radius alone is over 4,500.

We remain concerned that the heritage protections currently in place in the planning system will effectively be turned off, as there has been no provision for heritage outlined in the program other than the following paragraph (in relation to heritage conservation areas):

*The changes proposed will result in significant change in these locations as additional housing is delivered. But it is important to work together to embrace the transition that will occur as the character of these locations evolves.*

*The new planning controls will apply in heritage conservation areas. However, a merit-based assessment will continue to apply to developments in these locations and relevant heritage controls will apply to the extent that they are not inconsistent with the new standards.*

Considering that heritage conservation will almost entirely be inconsistent with six storey developments, it is unlikely that the current provisions will be adhered to. It is also noted that no comment has been made on the conservation of individual local listings or State heritage listed items.

#### Acknowledging the need for housing

The National Trust recognise the need for more well-located housing in NSW, and the need for planning reforms to facilitate this, but we also strongly oppose the proposed “one-size- fits-all” approach to the planning system represented by this proposal that will have an unparalleled negative impact on the planning system of NSW – including impacts to heritage.

The National Trust recognise that there are many alternative ways to address this issue that can help ensure the very special character of greater Sydney and coastal NSW are preserved alongside this growth, including the fact that there are well over 150,000 unoccupied dwellings in Sydney alone. We cannot agree however that the proposed changes will “build a better planning system for the future” or that they will “enable better planning that is led locally” when they in fact override the existing planning system completely and take away all ability for local input into planned growth. These changes will in fact have the opposite effect, taking away many locally-led controls aimed at preserving the character and amenity of local areas, and dismantling any effective heritage or environmental controls in the planning system of NSW.

If the proposals being put forward go ahead, previous plans to destroy The Rocks will pale into insignificance with the scale of heritage destruction that will be legitimised across NSW. We note that the non-refusal standards propose to turn off all heritage and environmental controls that conflict with the new legislation. This is the biggest threat to heritage since the Heritage Act 1977 and Environmental Planning and Assessment Act 1979 was introduced.

We urgently call on the NSW Government to maintain its election commitment to protect the heritage of NSW by ensuring that heritage protections remain in place as part of a legitimate planning system.

The National Trust join the Heritage Council of NSW in relation to the following resolutions made in response to TOD:

- Encourage further discussions with DPHI to better understand any impacts on heritage listed places and heritage conservation areas, and the mitigation of such impacts.
- Support the exclusion of locally listed and State listed heritage items from the uplift in planning controls within TOD 2
- Record our considerable concern about the impact on existing heritage conservation areas given their important contribution to local communities’ heritage, character and sense of place.

In addition, we would call for Heritage Conservation Areas to remain protected and to be excluded from the TOD proposal. As the Trust has constantly pointed out, appropriate development is permitted in conservation areas and indeed to individual items that allows them to retain their significance and integrity. The controls that have been specifically developed for such places can and should continue to apply.

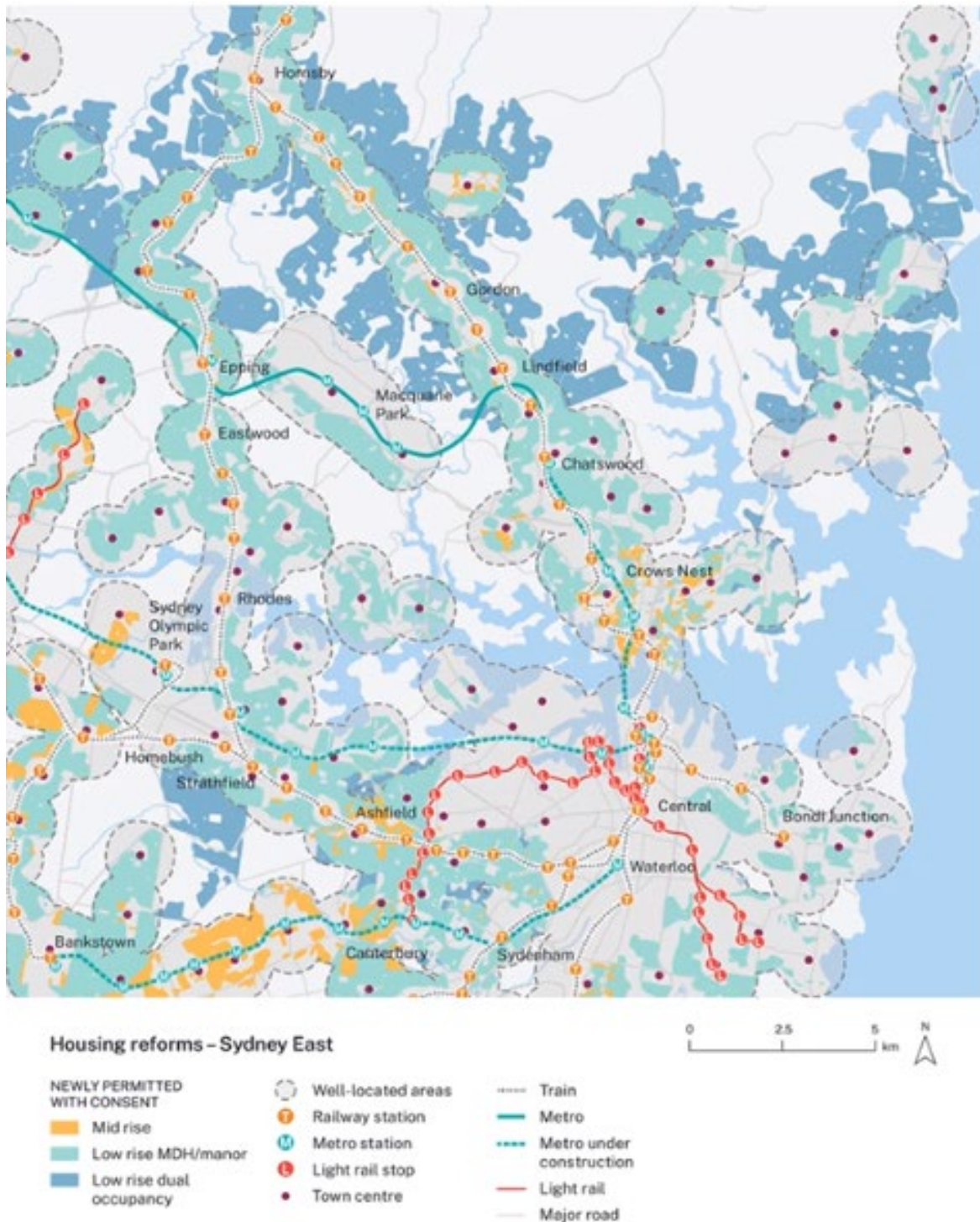




### Specific Impacts

The Trust acknowledges that many community groups have highlighted the specific heritage impacts of the TOD proposal on their local area. We echo the concerns of these communities and note the wider impact of the proposed housing reforms as shown by the plan below (not produced by the National Trust, but provided to us). TOD identified stations such as Roseville, Lindfield, Killara, Gordon, Croydon and Hamilton are all located in areas of rich built and landscape heritage – the majority of which have been previously listed by the National Trust and subsequently by Local Councils.

These station precincts all have a definable character, and all need to be considered individually. There is a very real threat to these places through “blanket” rezoning.





### A heritage strategy

The National Trust also note that this announcement has preceded the NSW Heritage Strategy, which promised to “set a new direction and vision for protecting heritage in NSW.”<sup>8</sup> Many individuals and organisations, including the National Trust, dedicated their time and energy by participating in “consultation sessions with targeted stakeholders to help shape the Heritage NSW strategy” – only to later have the same NSW Government announce these wide-ranging policies that will effectively turn off all heritage protections.

The NSW Productivity Commission report (p.43) also notes this omission:

*there is no clear strategic vision for heritage across the state, including how to balance heritage objectives with housing, business, and other objectives, how to prioritise what should be preserved and where, and how to evaluate heritage needs over time in a changing society. We need a state-wide strategic vision for heritage protection, as well as a mechanism for achieving it. The NSW Government’s Heritage Strategy, under development at the time of writing, is an opportunity to define what is most significant and to explore options to ensure we meet both heritage and housing supply objectives.*

The National Trust would be only too pleased to contribute to this discussion.

### **j) the enabling infrastructure capacity for every station selected or considered as part of the Transport Oriented Development Program**

The National Trust notes that no information or research has been made available regarding the infrastructure capabilities of the selected transport hubs. We remain deeply concerned that these places may not have the capacity for the projected uplift in population.

Many of the world’s great cities, including Sydney, underwent significant growth and development in the decades between 1860-1890. By and large, these are the cities that we enjoy today and that we will live with into the future. The existing railway network which still services most passengers in Sydney each day has a long history:

- Main Suburban Line (Sydney to Parramatta) opened in 1855
- Blue Mountains Line (to Mount Victoria) opened in 1868
- Illawarra Line (Sydney to Kiama) opened in 1887
- North Shore Line (Hornsby to St Leonards) opened in 1890

Similarly, the construction of the Upper Nepean Scheme to supply Sydney with drinking water was recommended to commence construction in 1869, with Prospect Reservoir completed in 1888. Many components of this infrastructure are now heritage listed – not to ensure they are stuck in the past, but because they have played a major important and ongoing role in our society.

The effects of simply increasing housing supply with almost zero attendant investment in infrastructure is already evident in a number of areas. The National Trust fear that continuing to ignore the need for new infrastructure, as well as placing greater pressure on existing infrastructure, will be another unintended consequence of this policy.

As the current Member for Camden, Sally Quinnett MP, has noted in the NSW Parliament:

*“Camden has had unprecedented growth in the past decade. We are welcoming new residents weekly—which is wonderful. However, our infrastructure is not coping. During the 2022 floods it became increasingly clear that a single road in and out of the area was not adequate, and the fact that it can take more than two hours to get to Sydney is a major problem. Many people I have*

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<sup>8</sup> <https://www.haveyoursay.nsw.gov.au/nsw-heritage-strategy>



*spoken to are commuting daily for over 1½ hours each way, which affects family life and community engagement.*

*We need more schools, access to health care and emergency services. Moving to the area should not result in the punishment of a lack of infrastructure. It is no longer adequate for the people of Camden to continually be leaving the area for employment and sporting events, and to enjoy the arts. The new Western Sydney Airport will provide an outstanding opportunity for Camden and the greater south-west to be more self-sufficient, but we must ensure it is not just a tarmac surrounded by more residential roofs.”<sup>9</sup>*

#### **(k) the impact on localised environment and amenity values caused by the Transport Oriented Development Program**

Heritage listing has been continually identified in recent media coverage as a barrier to housing and development. It is the firm opinion of the National Trust that heritage instead needs to be seen as part of the solution to the housing crisis, not the problem.

Housing is a vital part of a city’s character and community. As well as providing a home for vast swathes of our population over many years, our existing suburbs are indeed places people want to live precisely because they are of high quality and amenity.

The constant rallying cry for increased density ignores the fact that the most densely populated Australian suburbs are almost all in fact dominated by heritage conservation areas, with Elizabeth Bay, Chippendale, Rushcutters Bay, Ultimo, Potts Point, Haymarket, Pyrmont, Darlinghurst, Woollahroo, Forest Lodge and Newtown all leading the charge. Out of Australia’s 20 most dense suburbs, 10 are within the City of Sydney local government area. In many areas, heritage is density.

The National Trust remain concerned on the ecological and environmental impacts that TOD will have upon Greater Sydney. We note the following key issues:

- Significant reduction of urban tree canopy and increase in the heat island effect
- Significant reduction in natural landscaping, resulting in important loss of flora and fauna habitats
- The embodied carbon associated with knock-down rebuilds, and the waste of good quality building material
- The possibility of continued development in climate risk associated localities
- The effects of these issues in accelerating climate change

The recent housing growth of Sydney has been identified by the National Trust as unsustainable, in both financial and environmental terms, for many years. The endless expansion of Sydney’s suburbs to the west, over the limited amount of arable land in the country and in areas of great environmental, historic, and cultural sensitivity needs to stop.

On 4 January 2020, the western Sydney suburb of Penrith was one of the hottest places on Earth at 48.9 degrees Celsius, with the impact of climate change compounded by poor urban planning.<sup>10</sup> Houses are built with zero setbacks, and street trees are either not planted at all or left to die in the heat.

This situation is in stark contrast to what are now called the “established” suburbs of Sydney. Preceded by an investment in railway infrastructure, and with enforced planning controls that were considered appropriate at the time, suburbs developed with wide streets and areas for trees to be planted. Geography does have an

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<sup>9</sup> [Mrs Sally Quinell, Inaugural Speech, Legislative Assembly Hansard – 10 May 2023](#)

<sup>10</sup> [Anne Davies, ‘Ultimately uninhabitable’: western Sydney’s legacy of planning failure, The Guardian, 16 November 2021](#)





impact, but the effects of rising temperatures are now being exacerbated by the Urban Heat Island (UHI) effect.

Street tree planting has proven effective to reduce the ambient air temperatures in most local climate zones, with a study suggesting land surface temperature can be reduced by 6 degrees by simply providing a combination of tree canopy and grasses.<sup>11</sup> Under this proposal there is a very real concern that non-refusal standards will result in a decrease in tree canopy cover right at the point in time when it is needed more than ever.

**(I) the existing or potential measures and programs analysed, considered or implemented by all NSW Government agencies to support additional housing density, including the housing series reports published by the NSW Productivity Commissioner**

In their February 2023 report *What we gain by building more homes in the right places* (released after the Government's housing proposals were put on exhibition), the NSW Productivity Commission has identified (p.33) that policymakers should "Protect Sydney's heritage in a way that still allows renewal, diversity, and new housing supply" and that there is a need (p.41) to "balance heritage with renewal, diversity, and vibrancy."

The report goes on to note (p.42) that "preserving the city's heritage should not prevent our cities from meeting the needs of their current and future residents. We need a balanced approach that protects what is important, while allowing more people to live near and enjoy the city's heritage and valued locations. Density can achieve both goals."

Disappointingly, the report then goes on to claim that heritage conservation areas "cover at least half of the residential land in 50 suburbs across Sydney" and that this has "greatly reduced the amount of land available for new housing in Sydney's most desirable areas". The report then erroneously claims (p.42) that Heritage Conservation Areas "put swathes of land off-limits for new homes" and "restrict owners from redeveloping their land or undertaking significant extensions or renovations."

This is simply not the case, as the examples below from Elizabeth Bay highlight.



The new Omnia residential development (2018) by Durbach Block Jagers Architects (above left) saw the adaptive re-use of the former Crest Hotel at 226 Victoria Street Potts Point as a new development housing 132 apartments. In 2009 the same firm completed the four storey "Roslyn Street" commercial building (above right) which included offices and a restaurant/bar.

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<sup>11</sup> [Planning for urban vegetation in adapting to a changing climate resource list, Planning Institute of Australia.](#)



Meanwhile, just up the road at 18-32 Darlinghurst Road, the recently approved Queensgate development (left) designed by Tonkin Zulaikha Greer Architects, is now underway which includes 48 new apartments, a 65-room hotel and ground floor retail across a number of buildings, including heritage items.

These real projects show what can be achieved.

All of these developments sit within the City of Sydney's Potts Point Conservation Area. They were designed to respond to their environment and approved by the relevant authorities. It is plainly untrue to claim that heritage listing and conservation areas prevent any new development – they are in place precisely to ensure *appropriate* development.

Our heritage buildings often provide an excellent example of how to achieve more housing, with the densest suburbs in NSW dominated by heritage conservation areas. In many of the most successful redevelopment projects, heritage has been at the very centre of creating new and vibrant communities.

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

The National Trust notes that the *Transport Oriented Development* program does not stand alone, and is being implemented in conjunction with the *Low- and mid-rise housing reforms*. The combination of these two programs will have much greater effects on the whole Six Cities Region. It is particularly noted that these reforms will also see to further density around all other train stations in the region, as well as some residential and town centre areas.

We would refer the committee to our specific submission on the Diverse and Well-Located Homes proposal.