



STEP Inc

Community-based Environmental Conservation since 1978

1 February 2024

Department of Planning
Parramatta NSW 2124

Dear planners

Re: Changes to create low and mid-rise housing

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.

STEP recognises the pressing need to increase housing supply in NSW and the prerogative of building in areas close to transport and employment. However, we are very concerned about the proposals as currently detailed by the Department of Planning documents on Transport Oriented Development (TOD) and Explanation of Intended Effect: Changes to create low and mid-rise housing (EIE). There must be a better way.

Firstly, the NSW government must work with the federal government to reduce the future level of immigration to a manageable level. Even before the ramp up in immigration post COVID, NSW was struggling to build enough houses. The level of immigration is incurring a strain on state and local council budgets. Academic research has estimated that each new citizen adds an infrastructure cost of \$100,000. See <https://population.org.au/discussion-papers/population-growth-and-infrastructure-in-australia-the-catch-up-illusion/>

STEP's main objections to the proposals are:

- The long term impacts for the people of NSW that will result from ignoring the basic principles of ecological sustainable development and government strategies.
- The disregard for the conservation of heritage homes, particularly in the Gordon to Roseville TOD areas.
- The massive loss of trees and vegetation that will occur, particularly through the dual occupancy proposals that apply all over NSW low density housing areas
- The impact on biodiversity.

- The lack of infrastructure to accommodate the population increase
- The one-size-fits-all approval process that makes no allowance for local conditions.
- The loss of council planning controls.

The proposals do not conform with NSW legislation

These proposals go against the objects defined in section 1.3 of the Environmental Planning and Assessment Act such as:

- protecting the environment and conserving threatened species
- promoting sustainable management of built and cultural heritage
- facilitating ecologically sustainable development (ESD)
- providing increased opportunity for community participation in environmental planning and assessment.

They go against the ESD principle of intergenerational equity, namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.

These proposals overwhelm council housing and general planning strategies. These have been developed with no consultation with the local community.

We appreciate the need to act on the shortage of housing but this must not occur to the detriment of current and future generations of residents. Our unique natural streetscapes and wildlife will be obliterated. There has room left in our cities for the natural world. Human welfare depends of a healthy environment as explained in many NSW government documents such as the Greener Neighbourhoods Guide.

Impacts on heritage, local character and streetscapes

The cultural identity of Sydney and other centres in the Six Cities Region is based on the built heritage within established treed streetscapes that are an essential part of the amenity of our suburbs. Trees provide many health benefits such as reducing the heat island effect and other risks of climate change. They provide habitat for wildlife. They encourage people to get out walking and interacting with the community.

The NSW Government has recognised the importance of trees by adopting a goal of 40% tree canopy. The Greener Neighbourhoods Guide explains that urban trees and vegetation play a critical role in creating healthy cities. On page 7 of the Guide it is stated that '*The NSW Government recognises the value that trees, vegetation and green infrastructure play in our urban areas and is working to prioritise their provision through several targeted programs and policies.*' The District Plans place a strong emphasis on increasing tree canopy cover. The EIE housing proposals will reverse action towards achieving tree canopy goals. In the mid-rise housing areas there will be no room for any trees.

Trees on private land make up a high proportion of trees that constitute canopy cover. In the case of Ku-ring-gai 70% of tree canopy is on private land. A major

concern is that, when land is redeveloped, almost all vegetation is removed and replaced with much smaller trees and tidy vegetation such as box hedges that provide no benefits for wildlife. The Landscaping provisions (Appendix B of the EIE) provide mostly for 20% canopy cover using only medium size trees (up to 12m in height with less than 8sqm canopy), The maximum is 30% canopy for larger sites.

Overall the planning provisions will lead to wholesale loss of tree canopy and character in the areas within 800m of railway stations and local centres. The minimum setbacks for mid-rise flats will not leave enough room for trees lining streets. Often the streets within 400m of town centres are not wide enough to leave room for street trees. We will end up with hot, unpleasant streets dominated by traffic.

The landscaping provisions will not make up for the mature trees that will be lost. These new trees will take many years to reach maturity. In the meantime, habitat for birds to nest and feed will be lost. Large habitat trees for threatened species such as the Powerful Owl are rare and take over 100 years to develop nest hollows. The loss of mature trees should be minimised.

Another aspect of low-rise housing and dual occupancy will be the need for more driveways that will lead to the removal of trees on nature strips.

The losses due to dual occupancy developments are not predictable as they depend on landowners opting to redevelop or sell to a developer. We are already seeing massive loss of trees due to redevelopment of houses via the complying development pathway that is not contributing to any increase in available housing. Often these trees are mature native trees that are part of a critically endangered ecological community such as Sydney Turpentine Ironbark Forest.

Landscape provisions are not appropriate

The government Design Guides and Landscaping Provisions illustrate the different styles of low-rise development. These are on relatively flat land without established street trees so they are not appropriate for many parts of Sydney such as the southern side of the Pacific Highway between Wahroonga and Chatswood. They don't allow for steep streets and creek lines where stormwater management is difficult. These creeks are already badly eroded because of extreme rainfall events. Existing flood management strategies will be inadequate following the addition of large areas of hard surfaces.

We question whether the non-refusal standards for minimum site areas and floor space ratios allow enough space for on-site stormwater detention.

Loss of biodiversity

Under the EIE proposals thousands of trees will be cleared. Animal habitat will be lost and wildlife corridors will no longer exist. Trees in streets and gardens provide stepping stones that allow animals to move from one habitat area to another to breed and feed and provide ecosystem services such as pollination and seed transfer.

Many mature trees that provide essential habitat for birds and animals will be lost. They only need to be replaced with small trees that will not have habitat potential. Mature trees provide shelter and nesting sites and tree hollows. Many Australian species such as the Powerful Owl, gliders and possums depend on large old trees for their nests. It appears that the NSW government is not concerned about threatening the future existence of these species that cannot survive in scattered national parks alone.

Many areas of Ku-ring-gai are along ridge lines that retain the seedbank and soils that are essential for the survival of the last remaining areas of remnant critically endangered forest.

We are particularly concerned about the mid-rise development of up to 7 storeys near railway stations along the Pacific Highway from Roseville through to Wahroonga. This will create a wide strip of development about 1 kilometre wide that will be a barrier for wildlife movement between north to south bushland. The land falls away sharply on the southern side of the Highway where the impact of the ridge barrier will be emphasised.

Capacity to accommodate the population increase

Page 15 of the EIE states: “*The proposed reforms are designed to deliver new housing supply in established areas that have a capacity to accommodate growth in a way that capitalises on current and future investment in infrastructure.*” But where is the process for decisions to be made based on investment in infrastructure? Funding for several infrastructure projects has been cut in recent months. As already said, where is the strategic process that is implied in this statement?

The outcome of these higher density rules is unknown. Will there be enough schools, hospitals, recreation areas? Major changes like these should not be applied abruptly, instead be phased in gradually so their impact on new housing and infrastructure can be assessed.

Roads like the Pacific Highway are already congested for major parts of the day. People can't always travel by train when taking children to school. Trains mostly go into the CBD but many work in other locations where car travel is the only option. People don't normally carry their shopping distances like 800m.

The railway stations, particularly the TOD stations have been selected without due consideration of the infrastructure needs for the thousands of new residents. One of the TOD stations, Killara, does not have any shopping centre.

Loss of local council planning powers

As explained above STEP is seriously concerned about the loss of heritage houses and street character that will be brought about by the new housing policies and non-refusal standards as announced.

Planning policies are not measures for the short term. The built form of a city or town should last for many years and serve the community as a desirable place to live. Heritage houses cannot be rebuilt.

The growth in population is going to continue so we need a sustainable system for introducing increased housing densities, one that is determined in a strategic way by authorities that can apply a broader picture, not by an ad hoc process governed by individual landowners and developers picking where development will take place.

The planning system must continue to allow the consideration of issues such as consistency with existing built form, tree canopy targets, topography, bushfire risk with the need for asset protection zones and stormwater management. As announced the changes will create a mish mash of housing styles throughout Sydney.

Page 5 of EIE states '*Our longer term aim is to enable better planning that is led locally.*' How can this be the case when local council strategies and controls are to be overridden by non-refusal standards? The process is the wrong way around. Instead of imposing government standards at the start, councils must be able to decide how to implement the proposed housing designs and designate areas that are unsuitable.

Councils must be able to limit the amount of clearing on properties when additional dwellings are added so that mature trees are retained. The blanket dual occupancy approval provisions must not proceed.

Finally, the NSW government must ensure that these new dwellings are actually lived in and not kept vacant, or '*banked*' as a long term pristine investment.

We are very saddened by the prospect of the changes that these proposals will make to our beautiful city with all its unique bushland character.

Yours sincerely

A handwritten signature in black ink that reads "Jill Green". The signature is written in a cursive, flowing style.

Jill Green
President