



Oatley Flora & Fauna Conservation Society Inc.

Working to protect, conserve and enhance the natural environment
locally and globally, since 1955

Submission - NSW Government proposed changes to create low and mid-rise housing

Oatley Flora and Fauna Conservation Society Inc. (OFF)

OFF is based in the Georges River Council Local Government Area so, although our mission statement takes us far and wide, we will focus the following comments on GRC LGA.

These NSW Government proposals for increasing housing density go far beyond what we have seen in decades. The use of a blanket 'one size fits all' top down approach, the number of dwellings to be allowed on smaller and smaller block sizes, and the speed of implementation without the complementary consultation is breathtaking.

The State Government is planning to override existing Council planning controls such as those protecting heritage and environment. These will be non-refusal standards - no appeals allowed.

We have significant concerns with these proposals - particularly with the Low and Mid-rise Housing Reform proposals. **Deferral** of its implementation **is absolutely essential**.

We understand Georges River Council has met its required housing targets - but there are no exemptions. 400m from any railway station - up to 8 storey units may be built. Up to 800m from any railway station or shopping area, 3-6 storey units and other multi dwellings will be allowed. Terraces, townhouses and 2 storey apartment blocks near transport hubs and town centres will be allowed in R2 low density residential zones.

We share many of our Council's concerns including:

- (i) Overriding the master planning work that has been completed by Council in conjunction with the community for the Mortdale and Beverly Hills Local Centres,
- (ii) Providing uplift to centres that fall within the definition of "station and town centre precincts" without the appropriate master planning being in place to address community concerns of public domain and infrastructure provision,
- (iii) Providing capacity for up to 150,000 additional dwellings within the Georges River LGA without considerations of the availability of infrastructure to support this growth,
- (iv) Increasing housing capacity by permitting development on smaller allotments with greater height and FSR. This will result in changes to the low-density character of the LGA's suburbs, loss of trees and canopy cover on private land, replacement of on street parking with driveways, loss of street trees and increased traffic impacts due to additional density,
- (v) Permitting manor housing and multi-unit housing in the R2 Low Density Residential Zone and residential flat buildings (up to 6 storeys) in the R3 Medium Density Residential Zones in "station and town centre precincts" undermines the existing LSPS 2040 and the criteria for growth that was developed with the Georges River community,
- (vi) Permitting manor houses and multi dwelling housing in the R2 Zone and residential flat buildings (of 3 to 6 storeys) in the R3 Zone in "station and town centre precincts" undermines the hierarchy of residential zones developed with the community through the LSPS 2040 and implemented through the GRLEP,
- (vii) Applying the Low- and Mid-Rise Housing Reforms to Heritage Conservation Areas will compromise the social, built and cultural significance of these areas by permanently altering the historical subdivision pattern and character of the built form,

(viii) Applying the minimum lot width of 12m and minimum site area of 450sqm for dual occupancy development across the LGA is a significant reduction from the existing GRLEP requirements of minimum 15m lot with and minimum site area of 650sqm and 1,000sqm outside and within the Foreshore Scenic Protection Area (FSPA) respectively.

(ix) The Reforms do not address the infrastructure shortage that currently exists including insufficient open space, community centres, sports courts and libraries, which will put more pressure on Council to address both existing and future populations. There is no local character taken into account. Landscaping and tree canopy requirements and floor space ratios are far below council specifications. Dual occupancies will be able to be built everywhere on lots as small as 450sqm including the Foreshore Scenic Protection Area (FSPA).

Environmental concerns

In the midst of a climate emergency and increasing global temperatures, increasing housing density should NOT be done at the expense of losing green canopy and green corridors. Increasing density should NOT be an excuse to eliminate gardens and street trees from urban developments or remove trees from existing urban areas.

It is NOT sufficient to have green areas relegated to parklands alone. A green matrix needs to be spread among the fabric of urban developments and protected in existing urban areas in order to provide relief from increasing temperatures driven by climate change, and to provide pleasant and livable spaces for communities.

The Government has set a tree canopy target of 40% for 'greater Sydney'. Recently published figures show that tree canopy in Georges River Council LGA has been **reduced** by 2.1% between 2019 and 2022. Council has acknowledged that the tree canopy target cannot be achieved by relying solely on public land. Canopy must be contributed to from private land.

So there's the rub. These **proposals for increased housing density** are encouraging **reduction** in private land available for vegetation and tree planting and hence work **directly against** the established Government strategy for **increasing canopy cover**. Something which we know is absolutely essential to our survival. Recent studies at WSU have shown that more sustainable development and particularly urban greening is necessary to reduce the growing effects of urban heat.

In terms of biodiversity, suburbs are a refuge for a surprising number of Australian native species. A 2020 [Australian Conservation Foundation report](#) found that "Around 25% of Australia's nationally listed threatened plants and 46% of threatened animals can be found in cities, towns and suburbs.

While many of these species also have habitat outside cities and towns, for 39 threatened species, these urban areas are the last remaining places where they exist..."

The government's proposal simply does not adequately account for endangered species and biodiversity within suburban areas.

A local example of remnant native forest harbouring threatened and endangered species is the private property named Glenlee on the LGA's Lugarno foreshore of the Georges River. Pristine areas of land in urban areas like Glenlee must be exempted from development to protect the environmental integrity of Georges River. Remnant fauna need connectivity of bushland to move around the river. The Foreshore Scenic Protection Area must be preserved. If the state govt needs to find suitable space for more housing it can't remove existing tree canopy to do so. This will be

robbing future generations of the opportunity to coexist with nature on our doorstep. A quality of life that encompasses human and nature alike.

A **lot** more thought needs to be put into these proposals. Some suggestions are:

1. Dual occupancies should not be automatically allowed on any R2 zoning and should not be permitted where zoning or other mechanisms identify significant trees and vegetation or other items of environmental or cultural heritage value present that require protection. Building height in R2 Zones should be limited to two storeys.
2. Dual occupancies, terraces, townhouses and 2 storey apartment blocks should only be permitted close to transport hubs where they will not require the removal of significant vegetation or large trees or items of environmental or cultural heritage. Their construction should increase large tree canopy, not decrease it.
3. At least 40% of a lot should be set aside for green space, and new developments should be required to provide enough space to plant large trees along streets.

Conclusion

We call on the NSW Government, in relation to the proposed SEPPs, to defer the timetable for rapid implementation and undertake a proper process of:

- Consulting directly with communities;
- Working with Councils to understand each community;
- Protecting natural and built heritage;
- Maintaining the tree canopy, wildlife and environment; and
- Investing in all necessary new and additional infrastructure.

Thank you for the opportunity to comment on these proposals

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