

Submission
No 121

**INQUIRY INTO PLANNING SYSTEM AND THE IMPACTS
OF CLIMATE CHANGE ON THE ENVIRONMENT AND
COMMUNITIES**

Organisation: Lungs of Leichhardt Working Group

Date Received: 3 November 2023

Submission to the Inquiry into the Planning System and Impacts of Climate Change on the Environment and Communities

This submission is from the Lungs of Leichhardt working group. The Lungs of Leichhardt working group was formed by local residents to understand the issues related to the Inner West Council's plans to propose rezoning of their homes, including the impact on biodiversity and local threatened ecological communities, and in relation to climate change and flooding. Further information can be found at:

<https://lungsofleichhardt.com/biodiversity/>

We are grateful for the opportunity to provide our example as a case study of how the current planning system is failing to adequately protect against biodiversity loss and worsening the impacts of climate change, as well as to propose planning reforms and regulatory options that could deliver better protection of our disappearing natural habitats, while also delivering even more residential dwelling capacity.

(a) Proposed Development: Taverners Hill West Leichhardt

The Inner West Council (IWC) is proposing to rezone almost all of the R1 zoned single home blocks in the area bounded by Kegworth, Beeson, Hathern and Tebbutt Streets in Leichhardt, NSW (see Appendix 1 for map of location) to facilitate their removal and replacement with medium density apartments of 3-4 storeys (and 6 storeys on the other side of Tebbutt Street) using an expanded definition of R3 zoning to include residential flat buildings.

Despite the IWC working on this specific plan for over two years, there has been no notification of or attempts to involve affected residents in the process of assessing the suitability of this proposed site. The IWC plans to put this proposal on public display for comments for 6 weeks from 6 November – 14 December and finalise its submission to the State government in March 2024. There is no scheduled second round of consultations for the community to review and give feedback on any amendments the IWC may make before they are submitted to the State government.

The issue with this proposal that is relevant to this enquiry is that the area proposed contains the densest amount of backyard urban forest in Leichhardt and for much of the Inner West LGA (see Appendix 1 for a Google Satellite Map) and importantly, connects directly to the densest and most biodiverse section of the GreenWay wildlife corridor, and so provides much needed specialised habitat for native wildlife that have disappeared from the rest of Leichhardt and much of the Inner West LGA, as well as migratory birds and mammals.

Unlike much of the rest of Leichhardt and the Inner West LGA, these backyards contain dense, large trees (including 100 year old gum trees), mid and lower storey vegetation which provide continuous shelter and opportunities for feeding – especially for small birds. In

addition to the tree canopy, the nature of these backyards with sheds, underneath of Federation heritage houses and eaves, supports smaller native animals making their homes.

The GreenWay is also a critical corridor for birds on their way to Hunters Hill and Wolli Creek, and for those also migrating along the eastern seaboard. These trellis streets in the area proposed for development play a critical role in providing extra habitat to support their journey.

This is the last remaining area in Leichhardt (and much of the Inner West) that has rich range of small birds like the Fairy Wren. The reason for this is that much of the dense mid and lower storey vegetation has been removed elsewhere. The importance of this area can be illustrated by walking along the GreenWay from Parramatta Road to Iron Cove, there are plenty of small birds to be seen and heard in our section of the GreenWay (right next to the proposed rezoning area), but once you get to the end and cross over Marion Street to continue the walk along the GreenWay almost all the small birds disappear, as more aggressive birds like mynas and larger birds like seagulls take over in the more open green spaces.

The rezoning proposed will allow the destruction of habitat for threatened species and one of the most significant losses of tree canopy and biodiversity in the area in recent years. This area is home to a number of threatened and vulnerable species like the Powerful Owl, Grey-headed Flying Fox and the Long-nosed Bandicoot, along with homing a rich biodiversity of native wildlife that are increasingly losing their urban habitat including Ring Tailed and Brush Tailed Possums, long established families of Kookaburras, Kingfishers, Wattle birds, Superb Fairy Wrens and many more small native birds (See Appendix 2A for a longer list).

In addition to providing habitat for wildlife, the area is situated near or next to busy roads (Parramatta Road, Tebbutt Street and Hathern Street) and so the extensive tree canopy serves an important function to clean the polluted air that would otherwise drift across to the nearby Kegworth Primary School and the rest of West Leichhardt.

The tree canopy also considerably reduces the urban heat island effect, with this area being found in heat mapping as one of the coolest in Leichhardt. Removing the tree canopy and replacing it with apartments will result in increased carbon dioxide, vehicle pollutants and exacerbating the urban heat island effect.

The Inner West LGA tree canopy coverage is at 19.3%¹, which is well under the State Government's target of 40%, and Leichhardt has one of the lowest levels of tree canopy in the LGA at 11-15%², which means it cannot afford to lose any more.

¹ <https://www.greenerspacesbetterplaces.com.au/wwattb/inner-west-council/>

² See Appendix 2C

Yet despite the rich biodiversity of this area and the important role that the extensive tree canopy plays in cleaning our air and reducing heat, **the Department of Planning has ruled that there can be no protection of this area's tree canopy if the area is to be rezoned.** The Gateway determination letter from DPE to Council³ instructs the planners to:

'... (n) remove the proposed overall precinct/zone based tree canopy targets (including streets)'

As replacement, a "deep-soil target" is mentioned. However, deep soil plantings will take many years to grow, during which time most of the wildlife in this area will have nowhere else to go. Even if after many years, there are a few larger trees, there will be a permanent loss of the multi-level dense vegetation and the types of backyards with grass, sheds, eaves and under home areas which have created the specialised habitat needed for small birds, marsupials and lizards to flourish. The proposed rezoning would only amalgamate blocks in lots of 3 so they would be relatively small areas used to build mid-rise apartments, thus it is unlikely that much space could be set aside for large trees anyway as their roots and the overhang of the tree canopy would cause issues with the buildings.

Even though local environmental groups (e.g. Inner West Environment Group, Australian Conservation Foundation Inner West) recognise this area contains critical habitat for threatened species, populations and ecological communities, the Inner West Council has stated, *without* making an assessment of any potential impact to flora and fauna, that:

"The proposed changes are unlikely to result in any adverse effects on critical habitat for threatened species and ecological communities."⁴

In fact, the Inner West Council doesn't even include the section of the GreenWay that is adjacent to the proposed rezoning as "Biodiversity" land in their mapping (see Appendix 4) and thus requiring an assessment of potential impacts of development proposals, despite the Inner West Environment Group identifying this corridor as housing multiple threatened species (see Appendix 2A) and the IWC itself identifying this section of the GreenWay as a "Biodiversity Supporting Area" in other unrelated documents (see Appendix 2B).

Furthermore, the proposed area is recognised as being in a flood zone. In recent years, the impact of climate change has meant there have been frequent instances of flooding in this and nearby areas (see Appendix 5). Yet there has been no assessment of the risks and impacts on flooding to the feasibility of the proposal (in fact, no feasibility study has been conducted at all).

The proposed rezoning proposal that seeks to facilitate the removal of this urban forest is being positioned as part the Parramatta Road Corridor Urban Transformation Strategy 2016 (PRCUTS). Residents assumed this strategy focused on rejuvenating land on Parramatta Road, instead it targets suburban leafy streets, some of which are considerably removed from Parramatta Road.

³ See Appendix 3

⁴ See Appendix 4

Instead of rezoning to facilitate the removal of critical habitat for threatened species and ecological communities, as well as existing residents' homes (in an area that has been historically much lower income than the rest of the suburb), there are nearby alternatives that do not remove any tree canopy, critical habitat or existing homes and housing stock. For example, there are a number of locations that are zoned commercial / industrial along Parramatta Road that are currently vacant and have been so for a few years. This includes a barely used carpark and neighbouring large warehouses (See Appendix 6).

We are led to believe from IWC staff that the attention has shifted away from these far more suitable sites due to a delay in a review by the NSW Department of Planning of Council's policy for industrial and employment land. However, the cost shouldn't be borne by local wildlife and future generations who will suffer the loss of biodiversity and mature tree canopy as a result.

(b) Adequacy of Planning Powers and Planning Bodies

The inadequacy of planning bodies can be seen in how residents with local knowledge were not consulted and included as part of a multi-year design process.

This results in an area's important ecological significance and benefits to the community or environmental issues like flooding, to be overlooked or ignored by planners to the detriment of the community, potential future residents and future generations.

This inadequacy is further compounded by the structure of planning powers that mean there is little recourse for community members if the planning bodies get it very wrong.

We hope that the public submissions will move the IWC to remove this ecologically critical area from their proposed rezoning. However, if they don't – and we will note there is considerable pressure from the State Government for the IWC to submit this plan – then there is no recourse for anyone to challenge this decision or ask that it be reviewed.

There is not even an avenue to require the Council to undertake an assessment of the ecological impact before proceeding with their proposed rezoning.

In the absence of a proactive approach from planning bodies, to investigate and protect areas of environmental and ecological importance, the burden for advocating to protect these areas has fallen onto community members who often do not have adequate resources, skills or time.

(c) Planning Reforms Recommended

We recommend a number of planning reforms to improve the planning system:

- Create an avenue for community members to request an objective review of development approvals and approved planning proposals that have an impact in relation to:
 - o Climate change, pollution and the urban heat island effect,
 - o Biodiversity and habitat loss,
 - o Natural disasters and flooding.
- Require planning bodies to undertake assessments on biodiversity and habitat impact, flooding and climate change if requested by community members.
- Require large-scale development changes initiated by Councils or state government departments to be undertaken with genuine community participation over all stages, from design to final exhibition, to ensure that local environmental and community knowledge is included and incorporated.
- Reaffirm the importance of protecting habitat and tree canopy as top-level design principles for government planners and preferencing developments that don't impact climate change and biodiversity over ones that do.
- Increase the recognition of valuable habitat worth protecting beyond just tree canopy, but to include backyard habitat (soil, sheds, under homes) and multi-level vegetation.

(d) Alternative Regulatory Options

We recommend:

- Proactively working with communities to identify areas with low environmental and ecological impact where Council can preapprove types of development to speed up the creation of new housing.
- Bring in policies and support for rejuvenating unused commercial and industrial land that could much more quickly deliver larger number of homes than waiting (and hoping) for groups of residents to sell to developers. Use of mixed-use zoning could be incorporated in order to not have a net loss of employment and industrial land.
- Supporting increased mass transit options like the Light Rail along Parramatta Road that would significantly reduce pollution and noise and unlock much larger amounts of housing so that there is no need to even consider removing existing much needed tree canopy and habitat for wildlife.

Appendix 1: Location of Proposed Rezoning for Redevelopment

The map below shows the location of the streets to be impacted.



Figure 1: Area proposed to be rezoned(left) and Google Satellite Map of Taverners Hill North (right)



Figure 2: Photos of some of the affected tree canopy

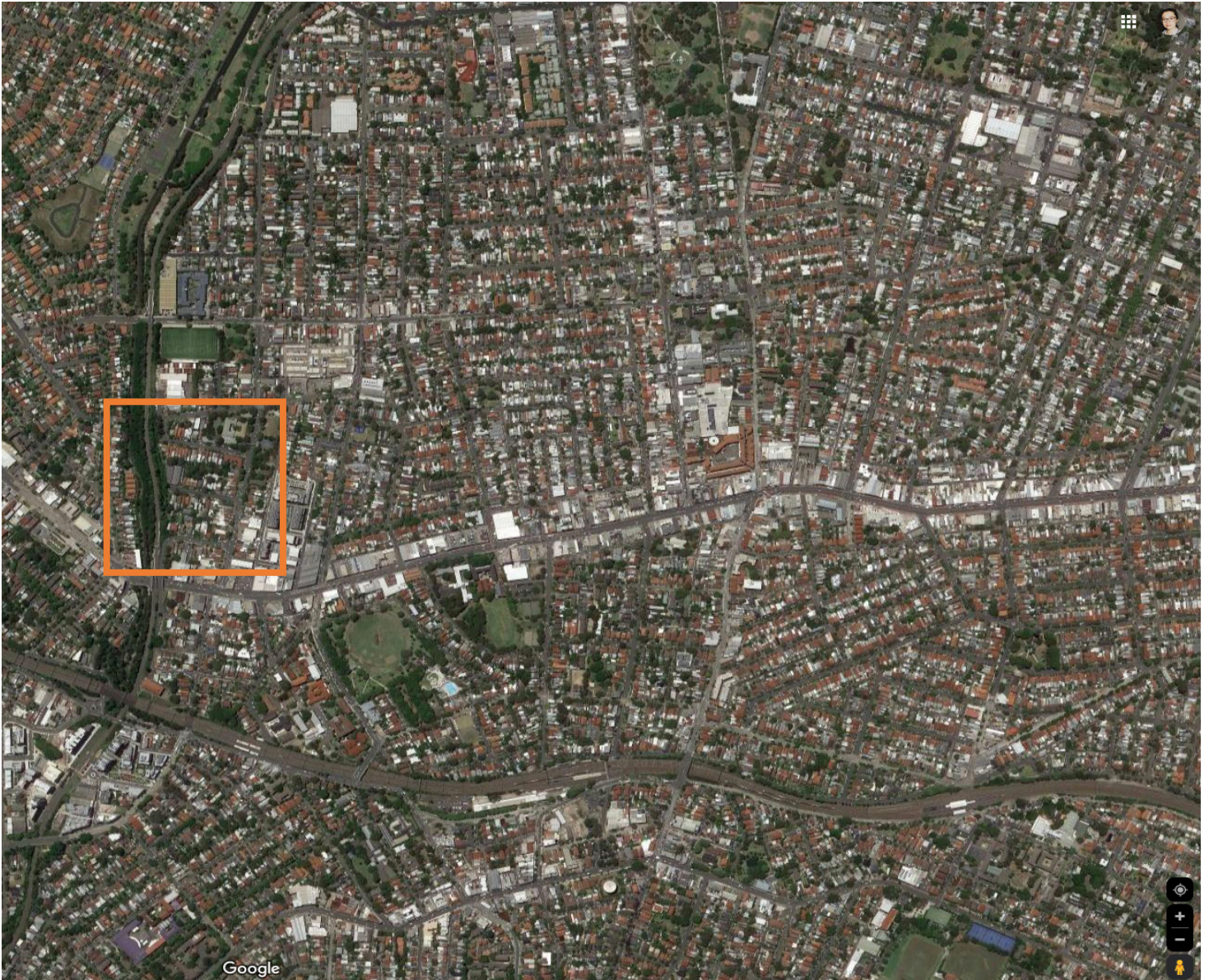


Figure 3: Google Map showing the tree canopy of the Taveners Hill North urban forest area proposed be rezoned in relation to the wider Leichhardt area – showing how little dense tree canopy there is in the rest of Leichhardt.

Appendix 2A: List of Threatened Species and Recorded Birds Impacted

Source: Jo Blackman, Inner West Environment Group

Threatened species that have been recorded in the GreenWay include:

- Powerful Owl (*Ninox strenua*)
- Superb Fruit-Dove (*Ptilinopus superbus*)
- Pied Oystercatcher (*Haematopus longirostris*)
- Grey-headed Flying Fox (*Pteropus poliocephalus*)
- Eastern Bent-wing bat (*Miniopterus schreibersii oceanensis*), and
- Long-nosed Bandicoot (*Perameles nasuta*)

Native Birds in Our Corridor:

Australasian Darter
Australasian Figbird
Australian Bush Turkey
Australian Golden Whistler
Australian King Parrot
Australian Magpie
Australian Pelican
Australian Pied Cormorant
Australian Raven
Australian White Ibis
Bar-shouldered Dove
Black-face Cockoo-shrike
Back Bird
Brown Gerygone
Brown Goshawk
Brown Honeyeater
Buff-banded Rail
Channel-billed Cuckoo
Chesternut Teal
Cockatiel
Collared Sparrowhawk
Common Blackbird
Common Koel
Common Myna
Common Starling
Crested Pigeon
Crimson Rosella
Eastern Cattle Egret
Eastern Great Egret
Eastern Osprey
Eastern Rozella
Eastern Spinebill
Fan-Tailed Cuckoo

Galah
Golden Whistler
Great Cormorant
Grey Egret
Greater Crested Tern
Grey Butcherbird
Grey Fantail
Grey Goshawk
Horsfield's Bronze Cuckoo
Intermediate Egret
Laughing Kookaburra
Leaden Flycatcher
Little Black Cormorant
Little Corella
Little Lorrikette
Little Pied Cormorant
Little Wattlebird
Long-billed Corella
Leaden Flycatcher
Magpie-lark
Maned Duck
Masked Lapwing
Musk Lorikeet
Nankeen Night Heron
New Holland Honeyeater
Noisy Friarbird
Noisy Miner
Olive-backed Oriole
Orient Dollarbird
Pacific Back Duck
Pacific Koel
Pacific Swift
Peregrine Falcon
Pied currawong
Powerful Owl
Rainbow Lorikeet
Red Wattlebird
Red-browed Finch
Red-rumped Parrot
Red-whiskered Bulbul
Rock Dove
Rose crowned Fruit dove
Rose Robin
Royal spoonbill
Rufous Whistler
Sacred Kingfisher
Satin Bower bird

Scaly-breasted Lorikeet
 Shining Bronze Cuckoo
 Silver Gull
 Sivereye
 Southern Boobook
 Spotted Dove
 Spotted Pardalote
 Striated Heron
 Sulpher-crested Cockatoo
 Superb Fairy-wren
 Tawny Frogmouth
 Topknot Pigeon
 Tree Martin
 Welcome Swallow
 White-bellied Sea-eagle
 White-browed Scrubwren
 White-headed Pigeon
 White-faced Heron
 White-naped Honeyeater
 White-plumed Honeyeater
 White-throated Needletail
 White-winged Triller
 Willie Wagtail
 Yellow-faced Honeyeater
 Yellow-tailed Back-cockatoo

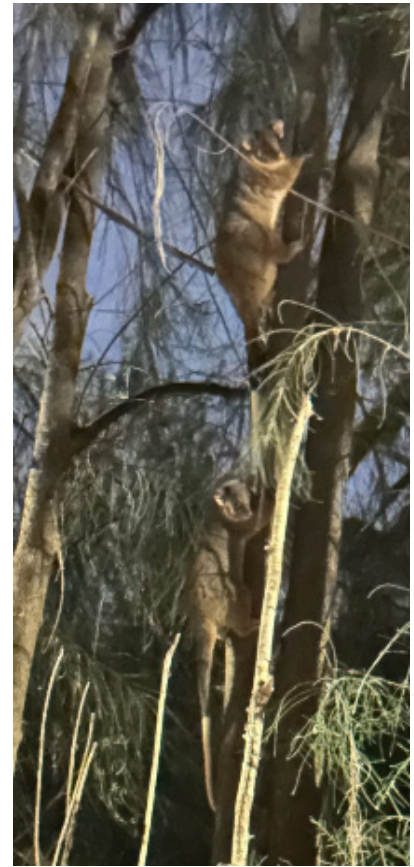


Figure 4: Local Ring tailed possums

Photos of examples of native wildlife in the backyards of this area affected by rezoning.



Figure 5: Some of our biodiversity residents

Appendix 2B: Biodiversity Corridor Map

Source: Inner West council business papers – August 2023 – Item 6 Draft Plan of Management-Neighbourhood and Pocket Parks

C2 Gulgadya Ward (Leichhardt)

Map 2 - SSROC Biodiversity Corridors

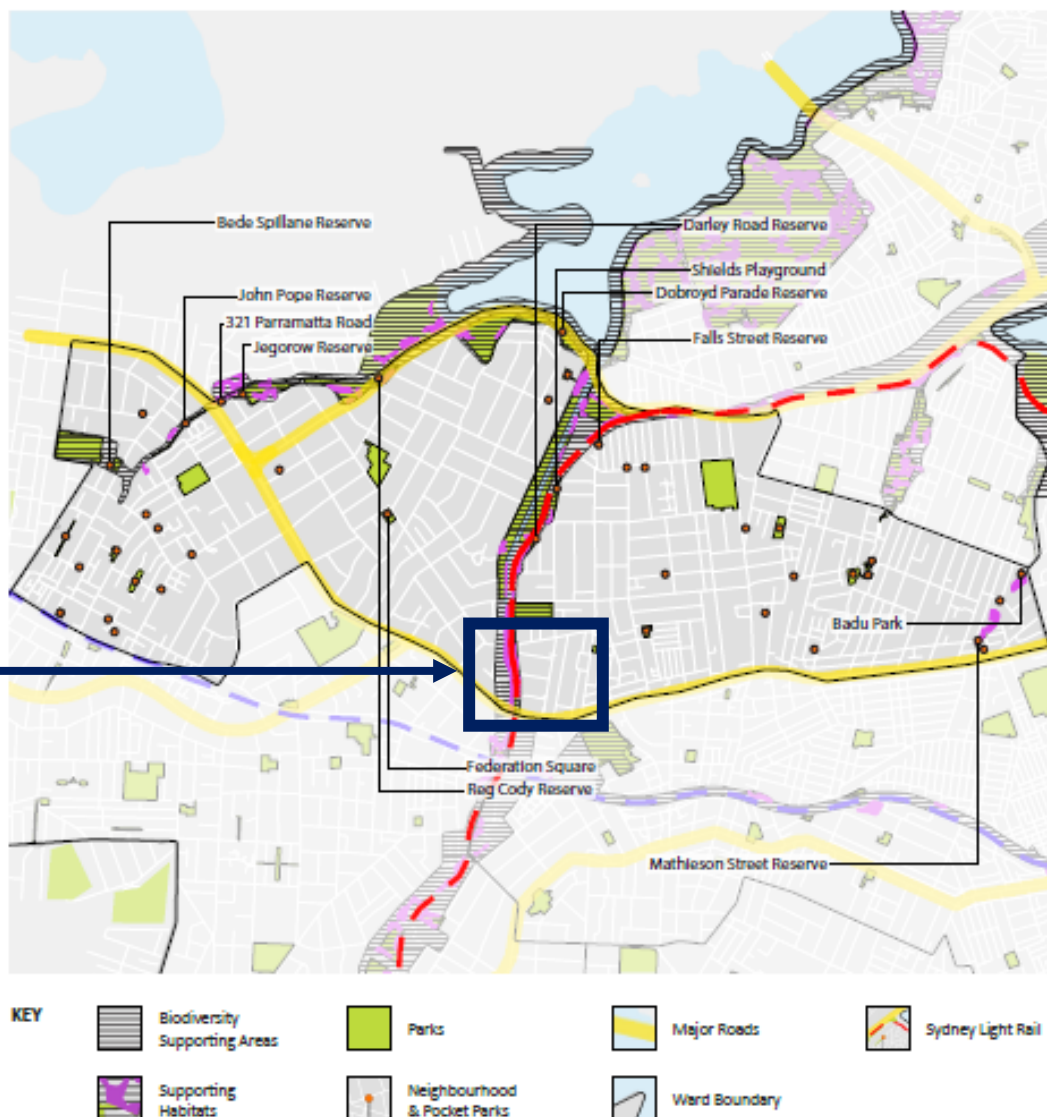


Figure 6: Biodiversity Corridor Map showing the Inner West Council identifying the section of the GreenWay directly next to the proposed rezoning as “Biodiversity Supporting Areas”.

Appendix 2C: Tree Canopy by Suburb in the Inner West LGA

Link: <https://www.innerwest.nsw.gov.au/ArticleDocuments/1036/Suburb%20Tree%20Canopy.pdf.aspx>

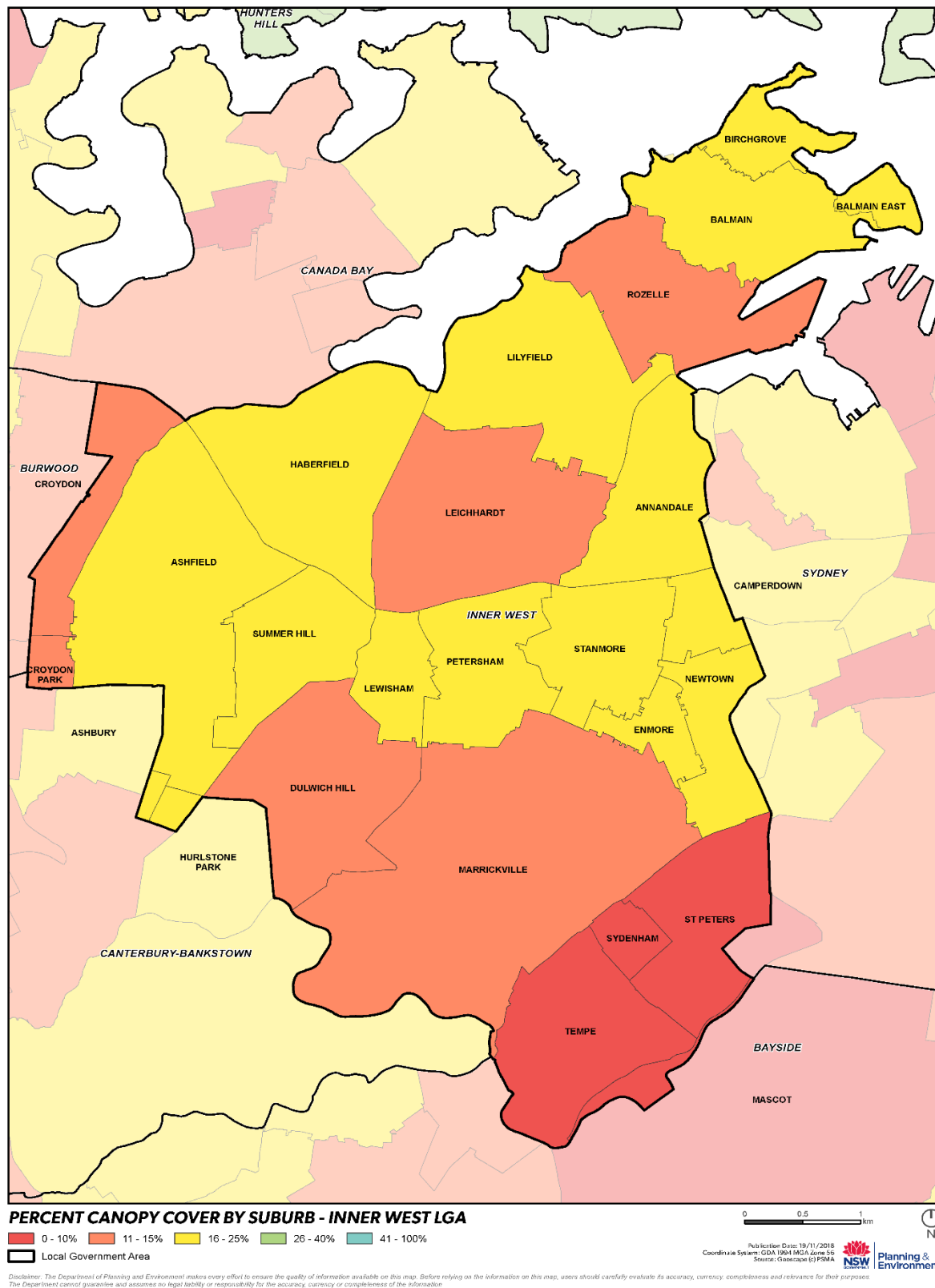


Figure 7: Map showing Leichhardt as one having one the lowest levels of tree canopy at 11-15% - it's even less that Camperdown and Newtown which are far closer to the CBD.

Appendix 3: NSW State Government Gateway Determination

Site Link: <https://www.innerwest.nsw.gov.au/develop/plans-policies-and-controls/planning-proposals/planning-proposal-tracker/parramatta-road-corridor-stage-1-implementation>

Link to specific document:

[https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Gateway%20determination%20-%20Inner%20West%20PRCUTS%20Stage%201%20\(PP-2022-1921\).pdf.aspx](https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Gateway%20determination%20-%20Inner%20West%20PRCUTS%20Stage%201%20(PP-2022-1921).pdf.aspx)



Department of Planning and Environment

Gateway Determination

Planning proposal (Department Ref: PP-2022-1921): to amend the Inner West Local Environmental Plan 2022 to implement Stage 1 of the Parramatta Road Corridor Urban Transformation Strategy 2016 (PRCUTS) in parts of the PRCUTS Precincts of Leichhardt, Taverers Hill and Kings Bay.

I, the Executive Director, Metro East and South at the Department of Planning and Environment, as delegate of the Minister for Planning, have determined under section 3.34(2) of the *Environmental Planning and Assessment Act 1979* (the Act) that an amendment to the Inner West Local Environmental Plan 2022 to implement Stage 1 of the Parramatta Road Corridor Urban Transformation Strategy 2016 (PRCUTS) in parts of the PRCUTS Precincts of Leichhardt, Taverers Hill and Kings Bay should proceed subject to the following conditions:

1. Prior to public exhibition, the planning proposal (including relevant appendices) is to be revised to address the matters set out below:
 - (a) include an explanatory note that future development will be subject to state/regional infrastructure contributions in accordance with the implementation actions in the Parramatta Road Urban Corridor Transformation Strategy Implementation Update 2021;
 - (b) include a figure or figures in the planning proposal that clearly identify all land and sites that are subject to the planning proposal;
 - (c) address consistency with section 9.1 Direction 1.5 Parramatta Road Corridor Urban Transformation Strategy, including:
 - i. the proposal seeks a height of 23m rather than 17m and a FSR of 3:1 rather than 1.9:1 for 97 Norton Street, Leichhardt. Appendix 12 to the planning proposal refers to the Urban Design Study, however it is unclear that the site is specifically discussed in the Urban Design Study;
 - ii. the proposal seeks a height of 23m rather than 17m and a FSR of 3:1 rather than 1:1 for 23 Norton Street, Leichhardt. Appendix 12 to the proposal acknowledges the FSR variation but not the height variation. Update Appendix 12 to the planning proposal to acknowledge the inconsistency and provide justification; and
 - iii. part of 35-53 Old Canterbury Road, Lewisham is proposed to remain with a FSR of 1.1:1 and is identified on the proposed FSR incentive map as 1.1:1. The incentive FSR map is to be updated accordingly to remove the area from the map.
 - (d) address consistency with section 9.1 Direction 4.1 Flooding, including:
 - i. update the planning proposal to address relevant recommendations of the NSW Government's 2022 Flood Inquiry Report;
 - ii. clearly address the requirements of Direction 4.1, providing clear assessment and consideration the level of flood hazard(s) that may impact the proposal; and
 - iii. remove references to outdated Direction 4.1 numbering.

- (e) to contemplate the suitability of the use of the R1 General Residential and/or R4 High Density Residential zones under Inner West LEP 2022 to remove the need to rely upon 'residential flat buildings' as an additional permitted use for land zoned R3 Medium Density Residential;
 - (f) remove the proposed additional heritage local provision;
 - (g) review and correct as required existing and proposed maximum building heights and floor space ratio provisions to ensure the planning proposal and proposed mapping are consistent;
 - (h) to include an assessment of the proposed sustainability provisions against *State Environmental Planning Policy (Sustainable Buildings) 2022* (Sustainable Buildings SEPP). This must outline how the proposed incentive targets relate to the targets set out in the Sustainable Buildings SEPP.
 - (i) in relation to the proposed performance standards for non-residential development, update the proposal to use the development type term 'office' rather than 'commercial development' or provide justification as to why the term commercial development is preferred;
 - (j) include a table in the planning proposal that clearly demonstrates indicative zoning under the Department's employment zones reforms;
 - (k) amend the proposed workers facilities provision to reframe it as an overarching clause setting out aims and objectives, the detailed requirements may be contained in a Development Control Plan (DCP);
 - (l) remove references to the finalisation of the draft Design and Place State Environmental Planning Policy (SEPP) 2021;
 - (m) remove the proposed clause that considers reduced sustainability requirements for heritage items;
 - (n) remove the proposed overall precinct/zone based tree canopy targets (including streets);
 - (o) remove the proposed incentive requirement for all car parking to be provided as unbundled parking in new developments;
 - (p) provide a plain English explanation of intent for the proposed community infrastructure contributions (CIC) clause for the Leichhardt Precinct, noting that the Department is unable to support a CIC levy that does not conform with the existing legislative framework for infrastructure funding under the *Environmental Planning and Assessment Act 1979*;
 - (q) remove the two proposed transport infrastructure provisions; and
 - (r) update the project timeline to reflect the progress of the planning proposal and Gateway timeframes.
2. Consultation is required with the following public authorities:
- Ausgrid;
 - Adjoining Councils;
 - Greater Cities Commission;
 - Commonwealth Department of Infrastructure, Transport, Regional Development and Communications;
 - Department of Education;
 - Environment and Heritage Group of the Department of Planning and Environment;
 - Environment Protection Agency;
 - Heritage NSW;

PP-2022-1921(IRF22/1918)

- Jemena;
 - NSW Health;
 - State Emergency Service;
 - Sydney Airport Corporation;
 - Sydney Metro;
 - Sydney Trains;
 - Sydney Water Corporation; and
 - Transport for NSW.
3. Prior to finalisation, the planning proposal to be updated to:
 - (a) address the Implementation Actions in the *Parramatta Road Urban Corridor Transformation Strategy Implementation Update 2021* to:
 - i. ensure the planning proposal aligns with any transport or infrastructure plan developed by the NSW Government; and
 - ii. address the recommendations and outcomes of the Precinct-wide traffic studies.
 - (b) provide additional analysis demonstrating that the tree canopy targets (% of site area) and the deep soil target can be achieved on a site-by-site basis;
 - (c) provide feasibility analysis considering the zoning, height and floor space ratio and other requirements for development including design excellence, affordable housing contributions, local and community infrastructure requirements and contributions, state or regional contributions and sustainability requirements. This updated analysis should also account for any amendments to the planning proposal that occur as part of the plan making process; and
 - (d) ensure that the thresholds for BASIX standards which trigger the incentive provisions are appropriate having regard to the Sustainable Buildings SEPP.
 4. The planning proposal should be made available for community consultation for a minimum of 28 days.
 5. The planning proposal must be placed on exhibition no later than **5 months** from the date of the Gateway determination.
 6. The planning proposal must be reported to Council for a final recommendation no later than **9 months** from the date of the Gateway determination.
 7. The timeframe for completing the LEP is to be **12 months** from the date of the Gateway determination.
 8. Given the nature of the proposal, Council is not authorised to be the local plan-making authority.

Dated 20th day of October 2022.



Amanda Harvey
Executive Director, Metro East and South
Planning and Land Use Strategy
Department of Planning and Environment

Delegate of the Minister for Planning

Appendix 4: Inner West Council Biodiversity Response

Inner West Council Link: [Parramatta Road Corridor Stage 1 Implementation - Inner West Council \(nsw.gov.au\)](https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Attachment%20%20-%20Planning%20Proposal%20-%20Post%20Gateway.pdf.aspx)

Link to Planning Proposal document featured below

<https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Attachment%20%20-%20Planning%20Proposal%20-%20Post%20Gateway.pdf.aspx>

INNER WEST

Planning Proposal

**Parramatta Road Corridor Implementation Stage 1
September 2023**



Inner West Council
innerwest.nsw.gov.au
02 9392 5000

council@innerwest.nsw.gov.au
PO Box 14, Petersham NSW 2049

Section C – Environmental, social and economic impact

Q7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The proposed changes are unlikely to result in any adverse effects on critical habitat for threatened species and ecological communities.

Land to the south of Parramatta Road between the Hawthorne Canal and Palace St, Petersham is identified as "Biodiversity" on the Natural Resource—Biodiversity Map under IWLEP 2022 (see Figure 10 below). Clause 6.4 Terrestrial biodiversity of the IWLEP 2022 requires the consent authority to consider the potential impacts to fauna and flora, and their habitats, in the assessment of a development application.

The Planning Proposal will not alter the extent of the biodiversity mapping, nor the requirements to be considered in the assessment of a development application on land identified as Biodiversity. Therefore, the Planning Proposal will not adversely impact threatened species, populations or ecological communities, or their habitats.



Figure 10 – Extract from IWLEP 2022 indicating the extent of Terrestrial Biodiversity (in green) in the Planning Proposal area (in black boundary).

Q8. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

It is unlikely that the proposal will result in any environmental effects that cannot be managed through the proposed LEP provisions in conjunction with the existing LEP provisions.

The Planning Proposal in fact includes provisions which will positively contribute to the environmental considerations in the Parramatta Road Corridor. In particular, the proposed amendments through FSR and HOB incentives mechanism will ensure that urban design, built form, amenity, stormwater management and environmental sustainability are given thorough consideration prior to granting consent to any additional development capacity above the existing LEP controls.

Appendix 5: Flood Zone

The following diagram is an extract of the PRCUT Flood Management Map – dated March 2022 which shows much of the proposed rezoning area is subject to flooding.



Figure 2-3 Taverners Hill TUFLOW Model Calibration Results

Figure 7: Source PRCUT Appendix 5 Flood Impact Risk

Extract of the PRCIT Flood Study states flood Hazards for our area:

- In the PMF, flood hazard throughout the majority of the study area is classified as H5 (Unsafe for People or Vehicles), due to the large depths or high velocities observed.
- In the 1% AEP event, H5 hazard is still observed especially along Beeson Street due the high velocities, and in the northwest corner of the study area due to large depths. The area in the northwest corner also experiences hazard in the H4 and H3, while the remainder of the study area is generally covered by H1 or H2 hazard.
- In the 2% AEP event, the distribution of hazard classification is similar to that observed in the 1% AEP event, although with slightly smaller extents.
- In the 10% AEP event, H4 and H5 hazard is observed in only certain localised areas of Beeson Street. The majority of the study area is affected by hazard H3 or lower.

Appendix 6: Parramatta Road Alternative Sites

A photo of a nearby alternative site on Parramatta Road that could deliver more housing quicker and with more certainty *without* removing urban forest and critical habitat.



Figure 8: Best and Less site on Parramatta Road and partially on Tebbutt Street, which has been for sale for a few years