Submission No 137

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

Name: Name suppressed

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Ms Higginson, Chair

Inquiry into the Planning System and the impacts of climate change on the Environment and communities

Parliament of NSW,

SYDNEY 2000

2 November 2023

Thank you for the opportunity to provide my comments to the Inquiry into the planning system and the impacts of climate change on the environment and communities.

I fully concur with Ms Higginson's statement that "It is critical that our planning system takes into account the impacts of climate change on communities and the environment, so planning bodies can make appropriate decisions that avoid increasing the risks of harmful effects on the environment through development."

Below are the key areas that require immediate consideration within the planning system to avoid increasing the impacts of climate change going forward. I recommend these comments for your consideration:

1. **Flood and Fire prone areas must be removed from future development.** As a Sydney resident within Ku-ring-gai, our area includes estuaries and is surrounded by National Parks, we have numerous fire and flood prone areas. As residents and local communities we continue to argue against expanding developments in areas that the NSW Fire Service and Local Council agree should not be developed. We are currently objecting to one such project at the Lourdes Retirement Village on the basis of high fire risk as supported by the RFS.
    a. This continues to highlight that planners and developers are being allowed to put peoples' lives and property at risk.
    b. My recommendation would is that designated fire and flood prone areas are exempt from further development. Where the NSW Fire Service or Emergency Services recommend that no further development be allowed, supported by Council, then there should not be any opportunity for any further recourse to the Department of Planning or the Land and Environment Court.
2. **Precinct Planning to address climate change**. Recently there have been press articles regarding the replacement of Plane trees in Sydney as the current forecast is that by 2050, Sydney's climate will approximate that of Grafton. (https://www.theguardian.com/australia-news/2023/oct/28/sydney-turns-over-a-new-leaf-and-says-goodbye-to-much-maligned-plane-trees)
    a. My recommendation is to for NSW Planning review the Design and Place SEPP proposal that was shelved under the Liberal Party due to heavy criticism from development bodies.
    b. The areas where this SEPP was forward thinking, being supported by the Government Architect, NSW Society of Architects, and numerous environment groups and Building Associations, that would make a tangible difference to future liveability relate to:

i. Better siting and orientation of homes and buildings to avoid the hot westerly sun.

ii. Wider verges between a road and a building or house to allow for substantial shade trees to be situated along a pathway with intermittent benches. People live in communities not always inside their homes. NSW must focus on allowing people comfortable, safe and available places to walk and interact at various times of day. Having just returned from Spain I would suggest in the heat of summer this would be more likely in the evening.

iii. Lighter colours for roofs to reflect rather than absorb heat.

iv. More open space between buildings to allow for air circulation and tree planting.

v. This SEPP also included an excellent focus on supporting communities through good design and allowing for space for community interaction.

vi. One of the criticisms of this SEPP was it was not prescriptive enough in terms of quality of construction to ensure minimum standards are met.

c. Mandatory Construction Quality Improvements

i. There must be better insulation and draft protection in homes. Recently I was in Berlin when temperatures reached over 35c for over a week. The interiors of units remained cool due to the high level of building construction required in Germany in terms of double levels of insulation, double glazing and air circulation around buildings.

ii. In NSW our buildings are, overall, not built well with minimum insulation and leaking windows. This needs to be changed.

iii. The private certification process for buildings remains a major obstacle to ensuring good building compliance on areas such as insulation and energy efficient glazing. I would recommend an end to Private Certifiers if at all possible.

3. Medium to low density housing is more energy efficient than high density.

Regularly studies are produced that highlight that high density is inefficient and generates more emissions than low to medium density buildings. See:

- https://www.ucl.ac.uk/news/2017/jun/high-rise-buildings-much-more-energy-intensive-low-rise
- https://www.greentechmedia.com/articles/read/getting-building-height-right-for-the-climate
- https://theconversation.com/cities-and-climate-change-why-low-rise-buildings-are-the-future-not-skyscrapers-170673
- The studies refer to the four storey building as the most efficient form of building in terms of emissions.
- An Australian Conservation Foundation study has calculated annual greenhouse gas emissions per average person living in each post code. This shows the annual national average for high-density areas is 27.9 tonnes per person, compared to 17.5 tonnes for low density areas. **High density is significantly less sustainable.**

- The claim that high-density makes housing more affordable is not borne out**.** We have seen more affordable older or smaller apartment buildings and homes replaced by high-density luxury units, essentially removing the lower value stepping stones into the housing market that worked so well for decades.

4. There needs to be a greater emphasis on biodiversity and habitat loss when assessing developments. This should not be part of an offset process as this has continued to fail to halt the destruction of our vegetation, forests and native animals across every state in Australia. Increased vegetation, more extensive tree canopy, biodiversity support, all add to reducing the impacts of climate change and maintaining the health of our environment.
5. Increase the importance of local councils and communities in assessing proposals as they retain the local knowledge of what is appropriate and safe for the area, and the best way to meet long term dwelling targets.

In summary, the key areas that need to be addressed to make any difference to the impact of climate change through the planning system is to limit high rise, improve construction quality, increase air circulation and tree canopy along streetscapes and between buildings and prohibit building on fire or flood prone areas if the relevant local authority, such as NSW Fire Service, and local council agree to the prohibition unless there are mitigating strategies that can be implemented. And importantly to improve oversight of construction to meet higher quality and insulation standards via a certification system more robust than provided by the current private certification system.

In light of the above it appears that Premier Minns government's recent initiative to allow developers a bonus to increase the number of storeys in buildings that provide short term affordable housing will only increase emissions and the impact of climate change.

Thank you for the opportunity to comment and I hope this has been helpful.

Yours sincerely,