

Submission
No 15

**INQUIRY INTO DEVELOPMENT OF THE TRANSPORT
ORIENTED DEVELOPMENT PROGRAM**

Name: Name suppressed

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Partially
Confidential

5 areas of concern rising from current planning reform proposal

1. Loss of heritage diminishes quality of life and can't be reclaimed once lost

The architectural heritage of our communities deserves to be respected and protected. It tells the individual stories of our suburbs, building a sense of belonging and cultural wellbeing. The unique identities that built heritage provides to the suburbs of Sydney also have value through visitors attracted to experience this, who make an important contribution to the local economy.

We must not let our heritage conservation areas be torn apart by a panicked and flawed response to the housing supply issue. We demand thoughtful planning from our State Planning Dept, not a thoughtless open slather for developers who will put \$ before our cultural wellbeing.

2. Reduced tree cover and impact on wildlife

These housing reforms give little consideration of the impact on local wildlife diversity and habitat and the liveability of our city. They will have a significant negative impact on urban tree cover and on wildlife habitat and corridors in Willoughby. The landscaping requirements and tree retention would be significantly reduced, resulting in a net loss of trees and native vegetation. If not carefully managed, the changes will lead to further native habitat loss and fragmentation of urban bushland.

Australia is already at the forefront of the global extinction crisis. We have an appalling extinction record, with another 2000 native species of flora and fauna currently at risk of extinction. Backyard habitat is critical to species survival in our urban landscape. Future generations deserve to experience the delight of urban encounters with blue tongue lizards, tawny frogmouth owls, sulphur-crested cockatoos, possums, bandicoots and the myriad of other reptiles, birds and insects found in Sydney's backyards.

These creatures will not survive without strategic protection of a green backyard corridor.

Blanket clearing of properties for subdivision and shrinking of deep soil planting requirements will devastate the populations of these precious creatures, already struggling to survive in an increasingly hostile urban environment.

Our wildlife doesn't have a voice, so we need Government to protect their right to survival in our urban areas.

In 2023 Willoughby Council initiated rolling programs to upgrade recreation facilities and expand the urban tree canopy across Willoughby that are in line with the NSW Government's own Greener Neighbourhoods program.

3. Increased urban heat

These reforms would not just have a negative impact on Sydney's biodiversity, but also to our physical wellbeing. Trees play an important ecological role in cooling our environment and improving of air quality. There are also positive mental health benefits gained by access to calming, natural spaces have been proven in scientific studies. Trees are critical to the survival of both humans and wildlife.

Concentrated housing developments can exacerbate the urban heat island effect. Reduced tree canopy and increased hard surfaces (buildings and roads) absorb and radiate heat, leading to higher temperatures. In a warming climate, this will make Sydney less liveable and discourage the use of active and public transport.

The Government's Greening our City Program has several initiatives to help reduce urban heat and create a cooler, sustainable and more liveable city. The program aims to increase green cover across Greater Sydney and contribute to lifting urban canopy coverage to 40% by 2036.

According to Recent ArborCarbon data our Willoughby LGA dropped to 34%, a canopy loss of almost 5% in the 3 years to 2022. This follows a drop of nearly 10% in the 7 years to 2020, as measured by the RMIT Urban Forest Cover study.

We are going backwards fast and these changes would greatly accelerate a decline that urgently needs to be reversed.

Any planning changes that are undertaken should ensure that government actions do not exacerbate the urban heat island problem. The planning changes must incorporate ways to make Sydney more liveable in our warming world.

Government planners should be looking at sustainability measures to minimise, not increase urban heat effects - initiatives like the ban on black roofing that was wound back by Anthony Roberts after bowing to developer pressures. At the time Paul Scully lamented the lack of commitment to net zero targets in relation to this issue, yet wholesale handover of our precious and limited green space to developers, will further increase urban heat. It will also create a tsunami of heated disputes between neighbours whose communities, homes and financial futures will be under threat.

Let's get black roofing off the plans and green canopy back on as a priority!

4. Impact on access to active and public transport

The increased population density created by the proposed changes must be provided with safe and comfortable ways to get to and from local town centres and public transport hubs. We need greater investment in public transport, and the development of a comprehensive network of separated cycle paths, along with lower speed limits on local roads, is essential to ensure that greater housing density will not result in horrendous congestion from a greater use of private cars.

If enacted, the proposed changes will override local government planning controls that have been developed in consultation with residents and could potentially reduce the quality of development outcomes across Willoughby.

5. Disregard for locally developed planning controls

Willoughby Council's new planning controls, put into place in June 2023, already provide significant capacity for new housing and growth. This is a more strategic and considered approach to improving housing diversity than the state government's proposed changes.

Council's new controls support and encourage strategically located growth, to deliver sufficient and diverse housing for our growing community. However, the NSW Government's proposed changes do not appear to be very strategic in the location of areas for growth and could potentially result in overdevelopment.

The proposed planning reforms take a far too narrow perspective on the issues of infill housing in Sydney. The government's proposal needs to incorporate initiatives that protect our existing natural environment and make our city more liveable and easier to get around, without the increased use of private motor vehicles.

We understand there is a need for places to live in - but we also need and deserve a liveable place! These reforms are trading away our liveability to line the pockets of developers.

Please vote against these planning changes to ensure that the future Sydney we create is one that we can be proud of. A city that honours our rich heritage story and protects our green canopy for the sake of our wellbeing, our wildlife, our attractiveness to visitors and for the broader environmental challenges we are facing.