

Submission
No 68

INQUIRY INTO DEVELOPMENT OF THE TRANSPORT ORIENTED DEVELOPMENT PROGRAM

Organisation: Willoughby Environmental Protection Association, Inc (WEPA)

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WEPA



Willoughby Environmental Protection Association

WEPA Submission to the NSW Legislative Council Inquiry into the Proposed Planning Reforms to Create Low-Rise and Mid-Rise Housing

The Willoughby Environmental Protection Association (WEPA) has concerns about the NSW Government's proposed changes to planning laws to create more low and mid-rise housing.

WEPA is a non-party community organisation, active since 1981, with an interest in preserving the natural heritage, protecting local bushland and wildlife and taking action to mitigate the impacts of pollution and climate change within the Willoughby local government area (LGA) and the wider environment. Over more than 40 years, WEPA members have made a considerable contribution to Willoughby City Council policies to protect and enhance our bushland and local environment generally.

WEPA believes that local environmental planning, to which members have contributed over the decades, has worked to provide a sensible framework for maintaining our bushland reserves and that its strategies, in the main, are of great and continuing value to the goal of preserving the bushland and biodiversity which is emblematic of our LGA.

WEPA is therefore concerned that the NSW Government's housing reforms are being proposed with little consideration of the impact on local wildlife diversity and habitat and the liveability of our city. Specifically, WEPA is concerned about the potential effects of the reduction in urban tree canopy.

Loss of urban tree canopy

WEPA supports government initiatives to reduce global warming and its effects on communities and environments across the world. At the same time, we also need to take immediate action to protect our local communities from the current changes in our climate.

The urban heat island effect is well understood. The changes proposed by these planning reforms will result in a reduction in tree canopy cover with increases in urban heat. Any planning changes that are undertaken should ensure that government actions do not exacerbate the urban heat island problem and, in fact, should investigate ways to make Sydney more liveable in our warming world.

In this regard, the importance of large, established trees compared to small replacement trees also needs to be recognised -

In general, large trees have a better capacity to capture carbon from the air and store it, reduce atmospheric pollution and prevent stormwater runoff.

[\(Large Trees are essential for Healthy Cities - The Conversation, 27 May 2022\)](#)

Loss of wildlife diversity

The proposed reduction in tree canopy cover will also have a significant impact on native plant and animal diversity in the areas that are affected by the changes. Habitat and corridors for local wildlife will potentially be affected by the changes. Planting trees will not replace the tree hollows that much of our wildlife use for refuge and nesting.

The NSW Department of Planning and Environment's "Cities for Nature" webpage says:

"Although Sydney might seem green, the abundance and diversity of our native plants and animals are decreasing. This is largely due to habitat loss and fragmentation, and the declining quality of habitat; for example, by introduced pests and weeds."

WEPA is concerned that the proposed planning changes contradict the Cities for Nature initiative. The proposed planning changes must incorporate initiatives to halt the decline in the diversity of native species in these areas.

Access to effective public transport

The proposed changes identify areas with "town centres" and on public transport links for additional low and mid-rise housing. However, Sydney's North Shore is currently struggling with inadequate public transport infrastructure capacity because of the previous government's changes to local bus services. Increasing housing and population densities here will only exacerbate this problem.

WEPA believes that the proposed planning changes must deal with already inadequate public transport in these areas at the same time as addressing housing needs.

Impact of increasing temperatures on the development of active transport

Increasing temperatures make outdoor activities, including active transport, more difficult for everyone. This makes Sydney's citizens less likely to use public transport and active transport options. However, an increased use of public transport and active transport is vital if the proposed planning changes are not to lead to unacceptable levels of congestion, with all the accompanying deleterious impacts on health and the environment.

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. WEPA believes that measures such as lower speed limits on local roads and the development of separated cycle paths are essential to encourage the use of active transport instead of private cars.

In conclusion, WEPA believe that the proposed planning proposals take a far too narrow perspective on the issues of infill housing in Sydney. The 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.