

# Friends of Narrabeen Lagoon Catchment



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The Manager,  
Housing Strategy Implementation Unit  
Land and Housing Corporation  
Department of Planning, Industry and Environment

**Housing Strategy for NSW**  
**Discussion Paper**

Dear Sir/Madam

Thank you for the opportunity to comment on this important subject.

We are a community organisation involved in the preservation of the natural native environment in the catchment area for Narrabeen Lagoon. These areas are non urban lands and area defined as Metropolitan Rural Areas in the greater Sydney Plan prepared by the greater Sydney Commission.

We recognise that there needs to be timely housing supply for the population increases in the Greater Sydney areas; however, it is essential that the strategy places more emphasis on locating housing supply in appropriate areas which prioritises the importance of the natural environment in contributing to *“well-being, offering benefits to households, communities and economy”*.

The Greater Sydney Plan 2018 notes the ***“critical importance of retaining the integrity of the values of the Metropolitan Rural Area”*** and specifically ***Objective 29 pg. 160 states, “urban development is not consistent with the values of the Metropolitan Rural Area. This plan identifies that Sydney has sufficient land to deliver its housing needs within the current boundary of the urban area” This eliminates the need for the urban area to expand into the Metropolitan Rural Area.” Restricting urban development in the Metropolitan Rural area will help manage the environmental, social and economic values HELP REDUCE LAND SPECULATION, and increase biodiversity offsets in growth areas and existing urban areas.”***

FUTHERMORE, the plan states

***“Rural-residential development is not an economic value of the Metropolitan Rural Area and further rural-residential development in the Metropolitan Rural Area is generally NOT supported. Limited growth of rural-residential development could be considered where there are no adverse impacts on the amenity of the local area and where the development provides***

***incentives to maintain and enhance the environmental, social and economic values of the Metropolitan Rural Area.”***

**It is essential that this Housing Strategy is based on the Principles of Ecological Sustainable Development.**

**It is essential that this is stated and incorporated into the strategy**

The discussion paper introduction states *“housing shapes the character of cities and towns across the State and when located in the **right places**”* then provides no further discussion to define “right places.”

In our experience the state Environmental Planning Policies are consistently used to override Local LEPs; these developments inappropriately intensify urban development on non-urban lands within bushland and adjoining these sensitive areas

The Non-urban lands of Northern Beaches LGA zoned for low and very low densities yet approvals are being obtained for Seniors Living, Boarding Houses, Schools, and other intense urban developments. The approvals for these developments are generally obtained through various SEPPs and the Land & Environment Court

This process is causing destruction of sensitive native bushland areas together with radical changes to the character of the neighbourhoods.

The first paragraph of the Summary document states, “Housing is essential to our well being, offering benefits to households, communities and economy” yet again there is very little discussion in the discussion paper about ‘our well-being’.

One of the essential factors to provide for our ‘well being’ is the close location of natural native environment to urban development.

The discussion paper is mainly concerned with economy, supply and demand. There is very little on the importance of neighbourhood character and the essential inputs for providing quality of life.

An essential ingredient to provide ‘quality of Life’ includes the preservation of existing native bushland area in close proximity to urban development. These areas provide for both the physical and mental health of the communities.

Vegetation in urban areas contributes to urban biodiversity and landscape, amenity and also helps to reduce urban heat island effects.

The inappropriate clearing of vegetation for urban development can undermine these benefits. E-zones are areas of vegetation with high ecological, scientific, cultural or aesthetic values. Bushland and Biodiversity are the bedrock of natural ecosystems and needs to be protected, sustained and restored.

We must continue to give global heating, wildlife extinction and pollution the urgent attention and prominence they demand with making decisions on the Housing Strategy

We are often faced with unacceptable development applications that are not in accordance with the LEP because they are permitted by State Policies that override LEPs.

It is essential that total 'Town Planning' is developed where housing strategy is part of this planning process.

When there is intense urban development approved that is not in accordance with the LEP there is usually insufficient community infrastructure.

The contributions from developments to provide community infrastructure are based on programs that are relevant to a LEP and do not provide for more intense developments that are permitted by state Government.

In recent years the State Government has reduced the amount of contributions to Councils even for developments that are in accordance with the LEP.

Therefore Councils are unable to provide all of the community facilities that are required for the increased population.

We note that there has been input from the housing industry. We consider that this industry acknowledges that there is an essential link between urban development and community facilities and that the industry agrees that the contributions should reflect the essential demands from the residents in the developments.

This needs to be included in this discussion paper.

The Vision statement in the document states, "Housing that supports security, comfort and choices for all people at all stages of their lives, achieved through supply that meets the demand for diverse, affordable and resilient housing that responds to environmental cultural, social and economic contexts."

This vision statement is suitable for a housing vision; however, it is important that the strategy provide for the character and natural environment of existing neighbourhoods as an essential ingredient in providing housing needs.

The word 'environment' is often used in the discussion paper. This word seems to describe the built or neighbourhood environment. Our submission refers to the importance of the natural environment which includes the existing native bushland areas with the waterways, flora and fauna, often with threatened and endangered species.

Further these areas are recognised by the NSW Rural Fire Service as high Fire Prone areas; therefore intense urban development is inappropriate.

The strategy needs to obtain input from the NSW Rural Fire Service.

The discussion paper mainly considers statistics with demand and supply with very little consideration on cultural, natural environment, and community infrastructure required to support the supply of more intense housing, particularly in existing urban areas of Greater.

The Discussions Paper consists of 4 Themes.

### **Theme 1 Supply**

This theme is about the amount, location and timing of the supply of new housing. Planning for the supply of new housing should respond to environment, employment and investment considerations and population dynamics.

Referring to the Summary document

### 1.3 Coordinate regional development and investment.

We consider that this can only be achieved with a robust Regional Development (decentralisation) policy with significant incentives.

A robust decentralisation policy will provide additional benefits by reducing the excessive housing demand in the Greater Sydney Region.

### 1.4 Better utilise available NSW Government owned land.

It is essential that any government development is in accordance with the relevant LEP and it is essential that this action is not destroying natural native environments.

Referring to the Discussion Paper

Page 16 The paper states “Traditionally most Australians aspire to home ownership with historical trends indicating a preference for a large, detached house with ample living spaces located in a safe neighbourhood close to family, friends, shopping and public transport.”

It is essential to add; medical services, recreation areas, government services, and other essential services and facilities necessary to provide a ‘quality of life’ in today’s urban environments.

Page 16 the paper states “As new generations enter the housing market, new preferences may emerge as people’s aspirations and values shift.”

With all the statistics available there should be a more definitive statement in considering alternative housing types.

Page 21 provides information about determining demand. It states that we cannot rely on housing purchases and it is better to base the demand on the rental vacancies.

We consider that this needs to be reviewed.

Page 25 discusses the location of new housing.

The list should include the preservation of natural native urban bushland.

Page 28 Infrastructure to support Housing.

More intense urban developments will require an increase in relevant community infrastructure.

Currently the State Government restricts the amount of contributions from developers for these essential community facilities. This means that the provision of facilities for existing communities are insufficient.

Before this housing strategy is implemented it is essential to review the policy for developer’s contribution for community facilities associated with more intense urban development.

Page 28 How can we better plan for jobs and housing?

To assist in reducing the excessive impacts of the increasing rate of urban development in the Greater Sydney area, it is essential that the State Government implement a robust Regional Development (Decentralisation) Policy with appropriate incentives to encourage employment to expand in the Regional areas.

Page 39 Our partners must also be involved e.g. Councils

As a community group we often make submissions to Councils when they are looking at planning issues. The council holds workshops on various housing and planning issues and makes appropriate submissions to the State Government.

However, the state Government often overrides the proposals by Council that have been prepared in consultation with the community.

Many other community organisations experience the same treatment.

Further the State government implements SEPPs that override the planning in LEPs that have been prepared in consultation with the community.

Housing strategies cannot be implemented without a total town planning approach with appropriate input from the community via the council where the local proposals are then developed into appropriate State Government Policies.

**Without a process that recognises the needs of the local community, the existing neighbourhoods will be destroyed and our valuable natural environment will be lost.**

## **Theme 2 Affordability**

The paper states, "This theme recognises people live in diverse tenures based on their income and circumstances and that housing should be affordable, stable and supportive of their aspirations and well being."

Page 48 the paper states."Councils have strengthened strategic planning powers."

Although our local Council has recently prepared a Local Strategic Planning Statement in consultation with the Community, this Statement requires the approval of the State Government. Further this Local Strategic Planning Statement will be the basis for the preparation of a new LEP, the LEP will require the approval of the State Government and the SEPPs that override the LEP will remain.

We do not consider that the Councils have strengthened powers when the State Government can override and often destroy good local planning.

Page 49 The paper asks the questions under the heading For Discussion, "There are a range of actions we could take to support housing diversity. Which ones should be prioritised in the Housing Strategy?"

The current methods include various residential zonings incorporated in LEPs and overriding SEPPs implemented by the State Government.

**We consider that all housing needs should be incorporated into LEPs so that the local communities are confident about the future character of their neighbourhoods.**

In considering affordable Housing the current SEPP for Affordable Rental Housing, which provides for Boarding Houses, is destroying the character of low density residential areas. While there is a need for this type of housing it should be incorporated into LEPs so that these developments are placed in appropriate locations.

Further there is a need to control the use and affordability of these developments.

At present the market controls the use and rent of these developments.

The intention is to provide housing for low to medium income lodgers. At present there is no screening of lodgers and there is no control on the amount of rent charged.

The SEPP provides benefits for developers to construct these developments at lower cost yet there are no savings passed onto lodgers, the savings are added to the developer's profits. This is unacceptable and requires a rigorous review.

### **Theme 3 Diversity**

The paper states, "This theme considers different types of housing and looks at how a diverse choice of housing can reflect the needs and preferences of households."

Our comments for the above Theme 2 also apply to this theme.

The paper asks what should be included in the strategy.

The discussion paper contains considerable statistics which are necessary for the development of the strategy. Many of these could be attached as appendix so that the strategy is more concise.

In developing the strategy; in addition to incorporating all the proposals from the existing agencies in NSW, there should be further investigations on various models in successful communities in other countries.

### **Theme 4 resilience**

The paper states, "This theme is about matching housing to community and environmental issues, so people, communities and homes are safe, comfortable and resilient."

Page 70 The paper states, "Homes located in the context of their local area including the open spaces that allow people to connect to their neighbourhood and people in their community."

Resilience should also relate to "quality of life".

This should include (as stated previously), the recognition that open spaces should include the preservation of the natural native environment.

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We would appreciate that our comments are taken into account when developing the strategy.

Yours Sincerely

Ron Patton

President, Friends of Narrabeen Lagoon Catchment