



## STEP Inc

Community-based Environmental Conservation since 1978

23 December 2016

Manager, Codes and Approval Pathways  
Department of Planning and Environment  
GPO Box 39 Sydney NSW 2001

Dear Sir/Madam

**Subject: Medium Density Design Guide and Medium Density Housing Code**

STEP Inc is a local community-based environmental group, with a membership of over 400 in the Hornsby/Ku-ring-gai area. Our objective is the preserve natural bushland from degradation and alienation.

STEP repeats our opposition to the idea of adding medium density types of buildings, including dual occupancy, to the definition of complying development. as explained in our submission dated 24 February 2016 on the discussion paper. The major reason for our opposition is that this idea will lead to poor planning outcomes by inserting medium density housing into R1, R2 and RU5 zones in an ad hoc fashion. It is intrinsically unacceptable to the people living in NSW to impose such intensification of development on communities using the uncontrolled system of complying development.

The Government has been saying since the election of the O'Farrell government that there will be an improvement in consultation and a return of planning powers to communities. The proposed medium density complying development does the opposite. Communities will be left in the dark while new medium density construction will pop up everywhere and change their neighbourhoods forever.

Our specific reasons for opposing the application of the Medium Density Housing Code are explained below:

1. Complying medium density development in single residential zones, even if limited to Councils where dual occupancy or multi-dwelling housing is permissible with consent, is particularly problematic, since it has the potential to change the whole character of our suburbs and regional towns. It could occur in most streets of the affected Councils regardless of their location, style of housing, history etc that is reflected in the existing character of our towns and suburbs. Often Councils have special provisions for dual occupancy or Multi-dwelling Housing to ensure they fit in with the local area eg limited Floor Space Ratio and single storey height. These provisions would be lost in Complying Development.
2. The Proposal will override Local Environment Plans (LEPs) and Development Control Plans (DCPs) that have been carefully developed by local councils with community consultation. These LEPs provide effective planning by taking into account the immediate and cumulative effects of types of development on local infrastructure, stormwater management, services, traffic, street parking, social services and amenities. Under the Proposal population numbers in a locality will change in an unpredictable, ad hoc fashion making infrastructure and community services planning impossible.
3. Complying development does not take topography into account. Large areas of northern and southern Sydney are very hilly. The construction of underground parking and the leveling or

terracing of land to allow building on a larger proportion of each block will have detrimental effects on the survival of existing vegetation and the ability of new trees to grow, In any case the remaining landscaping areas will only support small trees or shrubs. Water movement will be changed in ways that could be harmful to neighbouring properties. Assessment on a project by project basis will ignore these cumulative effects.

4. Further to the previous point there will be more driveways and therefore less room for street trees and trees on housing blocks. The idea of improving housing design, increasing tree canopy and landscaping to offset the heat island effect will be impossible to achieve. In the smallest 200 sm blocks garbage night will occupy the whole 6 metre frontage! The situation will be even worse in streets with terrace houses.

5. Complying developments should not assessed by certifiers appointed by the property developer due the inherent conflict of interest. Third party accreditation by experienced assessors must be required.

6. The Proposal could raise land values to the point where traditional single dwellings on larger blocks will be no longer affordable. Once one block becomes medium density the rest of the street will have an incentive to follow suit. Over time genuine housing choice will be eroded and medium to high density housing could be the only option for most people.

In conclusion Complying Development should only be applied within the core of existing medium density (R3) zones that do not interface with a lower density zone.

Yours sincerely

A handwritten signature in black ink that reads "Jill Green". The script is cursive and fluid, with the first letters of "Jill" and "Green" being capitalized and prominent.

Jill Green

President