



International Environmental Weed Foundation

ABN 96 105 174 678

Habitat Network

Director Codes and Approvals Pathways
Department of Planning and Environment

Re Submission re:

Draft Medium Density Design Guide and Code

with reference to Coastal Management SEPP and Greater Sydney Commission Plans

Thank you for the opportunity to comment. Our organization networks people and habitat for the benefit of our community and their interaction with the environment and native flora and fauna.

We believe these plans interact with each other and we have therefore addressed all 3 in this submission.

These draft plans are all working in tandem to increase the density of Greater Sydney (GS) and urban/residential areas across the State without sufficient safeguards and plans in place for protection of the environment including biodiversity, management of run-off effects, provision of adequate connectivity for our native flora and fauna, and management of the increased pressures of intensified housing on communities or to provide services that these communities need.

The Coastal Management SEPP states that residential areas are exempt from this SEPP – giving no safeguards for the impacts of nearby increased density of housing and development on our Coastal and estuarine areas.

Increased development independent of the LEPs (developed by Councils in consultation with their communities) will result in impacts which will not be able to be managed with the infrastructure planned by Councils. An unspecified and exponentially expanding number of medium density exempt and complying developments will have serious impacts on nearby wetlands, bushland, coastal areas, Littoral rainforests and endangered ecological communities. It will be impossible to retrofit the required infrastructure once the developer driven urban expansion process begins.

In the Blue Mountains for example these uncontrolled exponential increases in the built environment and population will impact on World Heritage areas. In other places it will impact rare and endangered communities and threatened species.



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There appears to be no limit on how many of these types of complying developments will be allowed across R2 residential areas. With the expansion and intensification of urban areas and population there should be tighter environmental controls and also an expansion of green corridors to ensure that we have healthy, livable and environmentally sustainable landscape into the future. Additional to green corridors identified by GSC for people and their movement we should have biodiversity corridors which limit human impacts and have a science based structure and NOT just rely on street trees for connectivity. Our small areas of urban bushland will not be able to cope with the increased population pressure and so need to be managed outside of the green network – as a biodiversity network - and valued accordingly.

The Greater Sydney Commission talks about a green web across GS – this is fantastic but according to the maps the green web for recreational activities will be via existing bushland corridors. Does this mean we will lose most of them due to concreting shared use bike and pedestrian pathways through what are already narrow biodiversity corridors. We need to have both recreation areas and bushland areas (which provide a different sort of recreation) so those in more dense housing have sufficient recreational opportunities for community health. We need to be progressive and be adding pedestrian corridors around or close to bushland remnants (not through the middle) and adding structured biodiversity connections to make functional flora and fauna corridors.

From unplanned and uncontrolled exempt and complying expansion of medium density development within what are currently reasonably green suburbs there will be loss of habitat connectivity, additional run-off, increased pedestrian traffic in our green spaces, increased heat generated from more hard surfaces (and loss of vegetation) and increased traffic and associated pollution. At present flora and fauna corridors and connections rely heavily on the urban backyard for connectivity. With bigger buildings on smaller blocks and high rises acting as substantial barriers these connections will be lost. Alternative connections need to be provided and this cannot be done with street trees. Larger birds use street trees all other fauna including pollinators will be isolated in many areas unless appropriate structured habitat connections are provided.

With changing climate, more severe weather conditions and loss of connectivity through intensive development it is vital to have connected biodiversity corridors for the future survival of our local flora and fauna as well as for the wellbeing of the local community.



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Planning and development approval should stay with local Councils and provide a community consultation process and be able to adjust with changing times and situations.

On a personal note the heritage street within which I live now has a 6-8 story development on the corner. The street is already unable to cope with the additional parking and traffic required for this build. Now that there is a high rise presumably the heritage value of the street is downgraded and therefore opportunistic unsympathetic medium density development will be permitted. There goes our heritage.

I don't see any additional schools being built to support the increases in population. I have seen a local school triple in the number of children that it is caring for over the past 3 years via addition of demountable classrooms on what was play areas for the kids. Schools need to be adding play areas and providing opportunities for kids to expend their energy and to also link with the environment through food gardens and habitat corridors through the schools NOT just adding below standard classrooms.

In summary we are opposed to any extension of exempt and complying development unless greater thought is put into play regarding the intensification of impacts on biodiversity corridors and the exponentially growing flow on effects to bushland, coastal, estuary and other biodiverse communities. The Coastal Management SEPP needs to take into account the impacts of residential development and the Greater Sydney Commission needs to include a documented and separate biodiversity network alongside an expanded green network for recreational activities and mobility.

Sincerely

Bev Debrincat
Executive Director