

Changes to create low and mid-rise housing  
Comments on behalf of Lane Cove Bushland & Conservation Society  
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The Lane Cove Bushland and Conservation Society Inc (LCBCS) has existed for 52 years, informing and working with Lane Cove Council to actively protect the amenity and bushland of our area. In particular, we see the local tree canopy as essential with the heating climate. Much of our energy is devoted to working with the Council to yield outcomes that are satisfactory with respect to multiple concerns, such as the provision of infrastructure and housing as well as environmental considerations.

1. **In summary.** The LCBCS does not support the “one size fits all” approach contained in the NSW Government's proposed "Changes to create low and mid-rise housing". This approach is contrary to good planning and does not allow for the fact that Lane Cove Council (like other Councils) has always met the State Government targets for increased density over many years.

The Society is alarmed at the effect the proposed changes will have on the urban tree canopy, the local climate and amenity for residents when our Local Environment Plans are overridden. The loss of tree canopy is in direct conflict with residents' and Australia's need to reduce greenhouse gas emissions and mitigate climate change. It is also contrary to Federal Labor policy in these respects.

The proposed reforms will lead to an enormous loss of the ecological services provided by trees and vegetation, namely the cooling, cleansing air effects of an urban tree canopy. The loss of back or front yard of deep soil needed for large trees due to unregulated dual occupancies, terraces and high-rise on too small-blocks of land, will disrupt microclimates and destroy the amenity of walking outdoors in suburban areas.

2. **Impacts on the planning system.** We are well aware that good planning must address a multitude of needs applying to both the local community and the broader metropolitan area. These needs are often misaligned, if not in direct conflict, but the proposed changes in the state's planning regime will have a negative effect on the resolution of these misalignments:

- \* The proposed changes will greatly reduce the ability of local Councils to plan for local circumstances, such as topography, local transport constraints, and local vegetation communities. In this way it will become much more difficult for us, or for any other local group, to play a constructive role.

- \* More broadly, the effect will be to severely undermine the democratic ideals embodied in local government and in the interaction of local government bodies with local organisations and local residents.

3. **Provision of housing.** We understand that housing is in short supply right across the Sydney Metropolitan Area, and that the need to meet this challenge is giving rise to a sense of urgency. However, that urgency is hardly new, given that for many years the State

Government has been setting targets for the provision of new housing in each LGA which Lane Cove Council has always met.

The proposed changes will further add to the burden on support systems such as transport infrastructure, community facilities, local retailing, and natural ecosystems. We suggest that if housing is to expand further – if not indefinitely – a rational planning approach is needed, oriented not merely to new housing, but to its integration with those other systems. And if the wider costs of that integration (e.g. in terms of traffic congestion, provision of schools, and threats to natural environment) are excessive, the Government ought to be willing to turn to alternative policies in areas such as regional development and immigration policy.

4. **Uniformity.** A notable aspect of the proposed changes is their treatment of the entire metropolitan area as being essentially uniform with respect to key attributes, including the provision of infrastructure and the urban landscape – a flat terrain punctuated only by “transport hubs” and “town precincts” – the latter serving in effect as the centres around which “walkable” circles are drawn on the planners’ map. This is clearly at odds with the actual landscape, which – especially in the inner North and East – is notable for its steep terrain, indented by the harbour and its tributaries. It may be that the “uniform” assumptions on which the proposal rests arise from a desire for uniform or equitable outcomes, but we urge the Government to see that a confusion of means and ends of this kind is deeply misguided.
5. **Urban quality.** Related to the issue of uniformity is that of the quality of the urban environment – including the quality of both the built and natural environment, both visual and substantial (e.g. in the presence of important ecological communities, or of old buildings that tell of change over time). In Sydney and in other cities around the world, it is evident that these things do not come into being overnight, but rather are the result of historical and natural processes operating over timescales of tens, sometimes hundreds, of years. The proposed changes seem to place no value at all on these qualities, in that they envisage the construction of massive quantities of new urban development without any consideration of architectural quality, integration with existing urban spaces, or impacts on natural communities. Such development is likely to yield a time-capsule embodying the worst of early C21 design.

**Conclusion.** The LCBCS suggests that a much more localized and fine-grained approach is needed, based on local development plans developed through collaboration between state and local governments, and supported by adequate State Government funding for concomitant needs, such as environmental works and maintenance, schools, and community centres.