



Submission to the NSW Government on Proposed Changes to NSW Housing Policy and Impacts on Ku-ring-gai

From: Voices Of Ku-ring-gai Community Association

1. Introduction

The Voices Of Ku-ring-gai Community Association submits this document in response to the proposed changes to the NSW housing policy, specifically focusing on the Transport Oriented Development Program as outlined by the NSW Government.

Our submission reflects deep community concerns regarding the potential impacts of these policy changes on the environment, heritage, and community wellbeing of Ku-ring-gai.

The character and ecological integrity of Ku-ring-gai are at risk, highlighting the need for a re-evaluation of the proposed housing strategy to ensure sustainable development that respects local values and environmental conservation.

The concerns within our community extend beyond simple opposition to development; the proposed plan threatens to cause lasting and irreversible harm to a crucial aspect of Sydney's urban environment. This development will permanently alter the landscape, affecting its character and ecological balance in profound ways.

2. Concerns Regarding Transport Oriented Development (TAD) in Ku-ring-gai

a. Environmental Impact and Loss of Tree Canopy

Ku-ring-gai is renowned for its rich tree canopy and biodiversity, providing critical habitat for endangered wildlife and birds. The proposed policy changes threaten to drastically reduce the tree canopy in affected areas from 30% to a mere 7%, undermining the council's Urban Forest Strategy aimed at increasing tree coverage from 45% to 49%. This loss not only contradicts environmental conservation efforts but also diminishes the quality of life for residents by impacting air quality, reducing natural cooling, and eroding local biodiversity.

The significant loss of tree canopy is made all the worse as we have 6 endangered ecological communities in the Ku-ring-gai area, two of which are critically endangered.

The native vegetation in Ku-ring-gai is representative of Sydney Turpentine Ironbark Forest (STIF) and the Blue Gum High Forest which are listed as a Critically Endangered Ecological Community (CEEC) under the Biodiversity Conservation Act 2016. Much of the vegetation in Ku-ring-gai is recognised as being "biodiversity significant" under the Ku-ring-gai Environmental Plan (KLEP 2015). The reckless planning proposal will see the further destruction of these sensitive forests and contribute to extinction events of fauna such as the Powerful Owl.

The NSW Government's own [Independent Review of the Biodiversity Conservation Act 2016](#) by Dr Ken Henry concluded that *"it is clear that the operative provisions of the Act are incapable of supporting its objectives. Too much rests upon the operation of other pieces of legislation that have their own, competing, objectives."*

Henry told the [ABC's RN Breakfast](#) that *"every indicator (on the environment) was going in the wrong direction. The first and most important thing is that, if the environment is going to have a chance, then environmental considerations have to have primacy in policy thinking, it's not going to be any good in the future to say, well, the environment is a nice-to-have but really we've got to focus on investment here, or a residential development there, or a mining project here, or continuing to log native forest over there – that those things are more important than the environment."*

The Government's rash planning proposal does not take into consideration Dr Henry's urgent plea that "environmental considerations have to have primacy" for all governments.

b. Heritage Destruction and Tree Loss

The architectural and natural heritage of Ku-ring-gai stands as a testament to the region's history and environmental stewardship. The new planning controls pose a significant threat to this heritage, with the potential for widespread destruction of heritage properties and massive tree loss. Such outcomes would irreversibly damage the cultural and ecological fabric of Ku-ring-gai, erasing decades of conservation efforts. Once implemented, these changes can never be reversed.

c. Affordability and Housing Supply

While the initiative aims to address housing affordability and supply, there is scant evidence to suggest that the proposed development model will achieve these goals. The focus on high-density housing around transport hubs may not inherently result in more affordable housing options, potentially exacerbating existing issues rather than alleviating them. There has been no evidence of consideration of traffic and infrastructure issues arising from the development model.

d. Overriding of Local Environmental Controls

The proposed framework implies that Local Environmental Plans (LEPs) and Development Control Plans (DCPs) would be subordinate to the new planning directives unless they align, effectively diluting local authority and jeopardizing Ku-ring-gai's capability to safeguard its distinctive environmental and heritage assets. Environmental laws and guidelines lose their purpose if they are simply bypassed in the hasty push to construct more apartment buildings.

e. Lack of Genuine Community Consultation

The process leading to these proposed changes has lacked meaningful consultation with the

Ku-ring-gai community. Genuine engagement is crucial to ensure that development reflects community values, needs, and environmental sustainability goals. The absence of such consultation undermines the democratic process and community trust in governance. This appears part of an accelerating trend at all levels of government to pay lip service to community consultation when government policy is at odds with environmental protections.

3. Proposed Alternatives for Sustainable Development

In light of the above concerns, the Voices Of Ku-ring-gai Community Association proposes the following alternatives to achieve a more sustainable and community-focused approach to housing development:

a. Enhanced Environmental Protections

Implementing stricter environmental controls is crucial for protecting the tree canopy and wildlife corridors in Ku-ring-gai. This involves not only setting clear regulations that limit the removal of native vegetation and disruption to natural habitats but also enforcing these rules rigorously. Development projects should be required to conduct thorough environmental impact assessments (EIAs) that evaluate the potential effects on the local ecosystem and propose mitigation strategies to minimize harm. Additionally, efforts should be made to restore and reconnect fragmented habitats to ensure the long-term viability of local wildlife populations and the overall ecological integrity of the area

b. Preservation of Heritage

The preservation of heritage properties within development plans is essential for maintaining the cultural identity and historical significance of Ku-ring-gai. This can be achieved by establishing clear guidelines that define what constitutes a heritage property and outline the procedures for its preservation, restoration, and incorporation into new developments. Incentives for developers and property owners, such as tax breaks or grants, can encourage the maintenance and adaptive reuse of heritage buildings. Furthermore, engaging heritage professionals in the planning process can ensure that development respects and enhances the historical character of the area.

c. Community-led Planning

Fostering a participatory planning process allows for a more democratic and inclusive approach to development. This means actively engaging residents, local businesses, and other stakeholders in discussions about future projects from the outset, incorporating their feedback into planning decisions. Tools such as public forums, workshops, and online platforms can facilitate this dialogue, ensuring that development aligns with the community's values, needs, and sustainability goals. By giving the community a meaningful say in the development process, projects are more likely to gain public support and contribute positively to the local environment and quality of life.

d. Innovative Affordable Housing Solutions

Addressing the need for affordable housing in Ku-ring-gai requires thinking beyond traditional high-density development. Alternative models, such as low-level development, cooperative housing, land trusts and inclusionary zoning, offer ways to make housing more accessible without compromising the area's character or environment. Implementing a mix of these strategies can create diverse housing options that meet the future population needs of our community.

e. Integrated Traffic and Environmental Management

Developing comprehensive traffic management plans is essential for addressing potential congestion while minimizing environmental impacts. This involves analysing current traffic patterns, forecasting future demands, and identifying infrastructure improvements to enhance flow and safety. Incorporating green infrastructure, such as permeable pavements, green roofs, and enhanced public transit options, can reduce the environmental footprint of transportation networks. Encouraging alternative modes of transportation, like cycling and walking, through the development of dedicated lanes and paths can also contribute to a healthier, more sustainable urban environment.

4. Conclusion

Voices Of Ku-ring-gai urges the NSW Government to reconsider the proposed changes to the NSW housing policy in light of the significant concerns raised.

We advocate for a development approach that respects Ku-ring-gai's unique environmental and heritage values, addresses housing affordability through innovative solutions, and involves the community in meaningful decision-making processes.

Sustainable development is achievable with a commitment to collaboration, conservation, and community engagement, ensuring Ku-ring-gai remains a vibrant and liveable area for future generations.

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