

# Submission in response to:

# "Explanation of Intended Effect: Changes to create low and mid-rise housing"

February 2024

Thank you for the opportunity to comment on the changes to the planning laws being proposed by the NSW Government, as outline in the document ""Explanation of Intended Effect: Changes to create low and mid-rise housing".

The Sutherland Shire Environment Centre (SSEC) is strongly opposed to these changes on the grounds they will:

- 1. amplify the environmental damage being caused by unsustainable population growth;
- 2. significantly increase congestion and pressure on infrastructure in our urban areas;
- 3. do nothing to address the current crisis in housing affordability or homelessness;
- 4. override heritage protections, local planning processes and the rights of citizens to object to developments which are likely to negatively impact them.

#### Environmental degradation caused by population growth

Population pressures are a significant driver of the current housing crisis in Australia. The proposed planning reforms are fundamentally flawed because they assume that continuous high levels of population growth are both inevitable and desirable. In fact, they are neither. They are the direct result of Federal immigration policies. Those policies are creating unsustainable pressures on our built and natural environments, driving deforestation, water shortages, species extinction and making our cities more crowded and less liveable. More people will simply make those problems worse.

The SSEC believes that Australia should have a population policy, based on principles of ecological and economic sustainability and with non-discriminatory immigration intakes set at levels consistent with those principles. Rather than pushing through draconian changes to the planning system to accommodate uncapped population growth, the NSW government should be lobbying the Federal government to cut immigration levels to sustainable levels.

As well as the strain the consumption demands of our population places on the fragile Australian environment, our growing cities are losing the tree cover that sustains significant populations of native animals and shields our homes from the increasingly hot summers occurring due to climate change. Urban infill on the scale advocated by this proposal will see a significant loss of the existing tree canopy across Greater Sydney, to the detriment of humans and native animals alike.

### Overcrowding, stress on infrastructure and loss of amenity

Increased urban infill will increase population densities and pressure on existing infrastructure such as roads, public transport, parking, hospitals, schools and public open space. Without commensurate investment in upgrading this infrastructure to meet higher demand, there will be an inevitable decline in public amenity and quality of life. The proposal makes no commitment to addressing any of these problems.

## Housing affordability and homelessness

The proposal offers no evidence that increasing housing supply and urban density will make housing more affordable. Nor does it outline how any of these changes will help NSW meet its commitment to providing more social housing.

The assumption seems to be that increasing dominance of the housing market by private developers will create more affordable and social housing stock, when the experience of the past several decades has been the exact opposite. Between 1971 and 2019, for example, the public housing component of new dwellings fell from 13.2% to just 1.1%.

The focus on developer-driven supply-side solutions also ignores the role of tax policy in the current housing crisis. The NSW government should be calling for a review of the impact of negative gearing and other tax concessions for the wealthy on the affordability of housing for the less well off. In the current housing market, it can be expected that the owners of the owners of the new dwellings envisaged by this proposal will be property investors, not first home buyers.

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Chair