



Submission on Proposed Design and Place SEPP

This submission is made on behalf of the Ryde Gladesville Climate Change Action Group. We are a community group of over 650 people concerned about climate change and wanting governments of all levels to take decisive and immediate action by putting into place strong policies that not only stop further carbon emissions but that remove carbon from the atmosphere and oceans.

With the effects of climate change becoming more pronounced, it is vital that urban areas in all parts of NSW are resilient and able to deal with increased temperatures, bushfire intensity and drought. In order for that to happen, ambitious, best practice and binding policies need to be implemented that will help with climate change adaptation and emissions reduction. The community must have confidence there are clear, achievable targets in place.

While there are good intentions with the five principles of this proposal, we have no confidence they can be achieved in its current, extremely weak state.

Our concerns about the proposed Design and Place SEPP are as follows:

1. There are repeated comments that *These intended effects will be realised through mandatory considerations...[including] for water management, green infrastructure, emissions, resource efficiency and tree canopy*. Past observations of developments would suggest that developers would be able to continue making environmental and liveability requirements as 'matters for consideration' by using 'flexibility', 'trade-offs' and 'moving away from prescriptive controls'. This would make any development requirements determined by the private developer and not the government.
2. Developers would be able to present studies as part of their project proposals that only "consider" environmental impacts meaning that councils and the community would have little capacity to fully assess development projects and argue for better, more sustainable developments.
3. The proposed SEPP sidelines communities and local councils and means that more developers will be able to contest local council decisions in court where councils have rejected or significantly amended development plans.
4. The NSW government has a 40% canopy cover target. However, the proposed SEPP allows the removal of existing tree canopy to be offset by things like green roofs and means that the government's own target cannot be met. It is vital that trees are retained and the cover increased. Trees are important habitat for our native fauna and flora, provide shade and health benefits, aid in minimising the effect of heat islands and improve urban water quality. Mandatory open space targets must not be offset by weak alternatives.

5. The current BASIX requirements including energy targets need to be strengthened to build more resilient buildings that will serve us well into the future and mitigate the effects of climate change.

Climate change is a real and urgent challenge. It will only get worse if governments do not now put into place strong policies that deal decisively with it and make our urban communities more resilient.

We therefore urge the government to recognise that the primary objective of this proposed SEPP must be to manage a rapidly changing climate and protect and increase biodiversity if we are to have healthy, liveable urban areas. We need a stronger, more transparent SEPP, not the one currently proposed to the NSW public.

Yours sincerely

Ryde Gladesville Climate Change Action Group