

Friends of Narrabeen Lagoon Catchment



P.O. Box 845, Narrabeen NSW 2101
www.narrabeenlagoon.org.au

28 April 2021

Department of Planning, Industry and Environment

Dear Sir/ Madam,

Submission on the
Explanation of Intended Effects
For the proposed Design and Place State Environmental Planning Policy

We provide the following submission on the proposed Design and Place SEPP.

Friends of Narrabeen Lagoon Catchment have over 365 members and 900 supporters whose mission is to seek permanent environmental protection for the remaining bushland in the catchment of Narrabeen Lagoon.

We are concerned that putting ***“place and design quality at the forefront of development”*** will be at the expense of the environment and threaten the remaining bushland in the Narrabeen lagoon Catchment and many other bushland catchments.

The Department of Planning website states “Our shared responsibility is to care for Country and sustain healthy, thriving communities underpins the policy” yet the introduction of another SEPP undermines the local environment and community participation in the development of LEPs.

The State Government has produced many SEPPs including HSPD & ARH which have resulted in LEPs being overridden and developments placed in inappropriate areas of the Northern Beaches LGA with the destruction of bushland and negative impact on water catchments.

Whilst our organisation supports good design and orderly planning, we are concerned that the proposed SEPP

- 1.is another document that will override controls in the LEP and is based on flexibility and discretion by applicants.
- 2.makes a mockery of the standards that developers must currently meet and replaces them with “flexibility” and “matters for consideration”.
- 3.allows applicants and their consultants to define the type and amount of open space for Development Applications.
- 4.directly conflicts with the new Northern Beaches LEP which will be based on the Local Strategic Planning Statement where the natural environment has been adopted as the TOP priority and supported by the Greater Sydney Commission.

5.further enhances the opportunity for developers to mount court cases to appeal decisions by Northern Beaches Council.

FoNLC reject the flexibility approach which invites trade- offs and undermining of fundamental goals.

We demand:

- certainty for communities around planning controls
- prevention of impacts on the natural environment
- protection of tree retention, mandatory open space targets free of weak compromise.
- Recognition in any planning document that climate change is urgent, and communities must be protected from dubious planning pathways which avoid emission reductions and delivery targets.
- Recognition that resilience of communities is paramount and not merely a “consideration”

The document states that a Principle based approach will encourage innovation and a stronger focus on better outcomes.

Our view is that change is certainly required by improving the prescribed controls to provide better outcomes for the community including residents in new developments. A Principle based approach will allow applicants for developments producing arguments to reduce outcomes.

To safeguard our shared values for future development in NSW FoNLC urge the State Government to scrap the proposed SEPP and allow Northern Beaches Council to continue with the preparation of the new LEP without the distraction of a proposed SEPP to override the LEP.

Yours sincerely,

Ron Patton, President