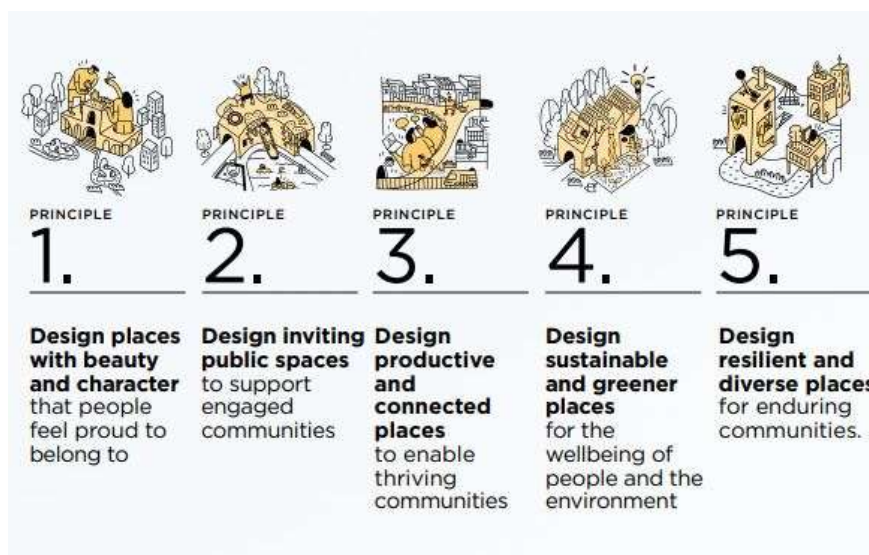


Members of New England Greens Armidale Tamworth (NEGAT) thank NSW Department of Planning, Industry and Environment for the opportunity to contribute to the important issue of the Design and Place State Environmental Planning Policy (SEPP).

NEGAT is concerned that the draft proposal's aims which are *to simplify and consolidate how to deliver good design in NSW* are mutually contradictory- good design is not simple design. The claim that the SEPP proposals reflect *Our shared responsibility to care for Country and sustain healthy, thriving communities (and this underpins the policy)* is undermined by the proposals that would act to remove the rights of local Councils.

The 5 Principles (adjacent) could serve communities well but only if linked to clear, achievable targets for the reduction of greenhouse gas emissions



We consider that inadequate attention is paid in the draft SEPP to the realities of the climate catastrophe facing us and that opportunities to embrace the technologies and practices of so many countries overseas are being lost. Planning must consider adverse climate impacts and decisions must be left in the hands of local communities rather than being abrogated by public authorities and ceded to private developers with a world of trade-offs, non-binding studies and choice of assessment methods best designed for developers to achieve their outcomes.

Climate considerations, carbon neutrality and transport:

Climate impacts: Twenty five percent of all emissions come from built environments; it is essential that all projects must explicitly consider climate impacts. These should include (but not be limited to) sea level rise, extreme precipitation/hail, more intense heatwaves, increased urban heat island effect, drought (water capture & recycling, impacts to structures due to low soil moisture, suitability of landscape plants), bushfires (including benefits of on-site generation and grid independence, need to bury power lines, indoor air quality), appropriately resilient and shady vegetation.

Carbon neutrality: No projects should be approved that are not demonstrably carbon neutral or carbon negative in operation and all projects should include embodied carbon and emissions due to construction (such as diesel fuel for construction equipment). Any offsets used to reach carbon neutrality should be gold standard.

Transport: Mobility for these new buildings and developments should also be carbon neutral, through design fostering walking and cycling, and support for public transport.

Building Regulations and BASIX:

NEGAT members acknowledge improvement in BASIX, however, we are concerned that the draft proposal allows the energy target in BASIX to be eliminated by considering the energy content of building materials. We argue that BASIX must, in fact, be even further improved, mandated and enforced and be a tool for achievement of net-zero emissions by 2035.

Mandated, improved BASIX would benefit communities through a reduction in the incidence of climate-associated deaths. More people die in Australia from heatwaves than any other natural disaster and Australia's rate of cold-associated deaths is double that of Sweden. Improved BASIX would lower energy bills, improve health and well-being, stimulate the economy and create jobs, improve the resilience of the electricity system, ensure low-cost emission reductions, facilitate social equity and reduce homelessness.¹

Current BASIX requirements are inadequate: that prospective purchasers do not have sufficient information about energy costs, so cannot make an informed choice. This market failure is best addressed by regulation. As well as benefits to consumers of reduced energy and water bills, improved water efficiency would reduce the financial risk to local councils of incurring substantial costs to truck water during droughts. The community health costs of air pollution from woodsmoke, now estimated to amount to thousands of dollars per wood heater per year, would also be reduced. Residents in the city of Armidale which experiences significant wood-smoke pollution (at an estimated health costs of over \$4,000 per wood heater per year²) would be well-served by improved BASIX.

Gas connections: There should be a moratorium on all new residential gas connections, and business/industry connections should have to be proven to be necessary

Energy and storage: New buildings should have provision for on-site renewables (or green roofs), and on-site storage. New precincts and larger developments should have on-site community/shared battery storage

Refrigerants: HVAC refrigerants must be compatible with the Kigali Amendment to the Montreal Protocol. The move to low GWP refrigerants must be accelerated by the SEPP and all refrigerants excluded by the Kigali Addendum should be phased out.

Better training and licensing for insulation installers and anyone working with refrigerants see [here](#), [here](#) and [here](#)

Training of architects: All architects and building engineers must receive training in environmentally sustainable design principles, climate risk, and emissions reduction with ongoing continuing professional development requirements

¹ Source: <https://renew.org.au/wp-content/uploads/2019/07/Community-Joint-Statement-for-Healthy-Affordable-Homes.pdf>

² Robinson, D. L., Monro, J.M., Campbell, E.A. (2007). "Spatial variability and population exposure to PM2.5 pollution from woodsmoke in a New South Wales country town." *Atmospheric Environment* **41**: 5464–5478.

Principle 4: Design sustainable and greener places for the well-being of people and the environment

Tree Canopies

NEGAT is concerned that, under this proposal, the retention of the existing mature tree canopy can be offset by green roofs, walls and softscape or two small trees, the survival of which is uncertain. In a region such as ours, which prides itself on its beautiful treescapes of intermixed European and native species, this is completely unacceptable. We are already afflicted by developments which raze all standing vegetation (including endangered ecological communities). The requirements of environmental sustainability and intergenerational equity demand the protection of these assets.

The 40% tree canopy must be mandated and not subject to 'trade offs'. As this graphic from 'Trees for Cooler and Greener Streetscapes' [here](#) clearly shows, a treed streetscape resolves the problems posed by:

- 1. the urban heat island effect: paved areas store heat that increases local temperatures and intensifies the impacts of heat waves;*
- 2. urban stormwater runoff: impermeable paved areas prevent rainwater from infiltrating into the ground, and instead shed water and pollution into waterways; and*
- 3. the lack of natural features and ecosystems: the absence of trees and vegetation severely impacts both human health (physical and mental) and ecological health in an urban environment. The integration of more trees and healthier trees in urban streetscapes will create cooler and greener public spaces.*



In conclusion NEGAT would urge the Department review the draft SEPP to include, as a matter of primary concern, clear, achievable targets for the reduction of greenhouse gas emissions and allow that planning in NSW should remain in the hands of local government bodies supported by further improved BASIX and a requirement for transparency in all 'development' projects.