



PRESERVING OUR HERITAGE

PO Box 85, HUNTERS HILL, NSW 2110
www.huntershilltrust.org.au

Department of Planning, Housing & Infrastructure
via: NSW Planning Portal

22 February 2024

cc: The Honourable Christopher Minns, Premier of NSW
The Honourable Paul Scully, Minister for Planning, Housing and Infrastructure

Submission re State Government's Proposed Housing Strategy

Former Treasury Secretary, Ken Henry got it right when he said policymakers have allowed intergenerational unfairness to become imbedded in our systems, with housing one of the big three policy failures of our time.

The State Government's proposed 'one-size-fits-all' changes to increase Housing Density can also be seen as undemocratic, unacceptable, unprecedented and most certainly, not fit for purpose. Homeowners, residents, local communities and representatives of local governments of regional cities across the state have rightly vented anger and alarm.

Much of our LGA, Hunters Hill, is a conservation area. Increased density via significant changes to our planning standards will increase heights and decrease landscaping requirements, resulting in loss of trees and vital tree canopy, increase traffic congestion and parking problems and will most definitely alter the look, character, liveability, environment and amenity of our municipality.

We strongly oppose the application of 'one-size-fits-all' and seek recognition of the individual uniqueness of our heritage conservation areas and special environmental factors.

The Trust has always supported the idea of in-fill housing to increase housing density ie terraces, semi-detached homes and dual occupancy and where applicable, adaptive-reuse. However, to initiate a blanket approach of planning rules which allow lot sizes as small as 450sm for dual occupancy and strip away protections with non-refusal standards that can override our LEP, is not the answer, nor is it suitable for small communities like Hunters Hill.

We question:

1. Why developers get to bypass LEP rules that protect our character, streetscape, built heritage, natural environment and reflect community vision and values for the future?
2. Where is the evidence that increasing development will make housing more affordable?
3. Where are the traffic, parking and infrastructure studies that demonstrate increased density is appropriate or feasible around local village shopping areas?

The National Trust suggests planning changes should not apply to heritage conservation areas nor to adjoining heritage items, and the Hunters Hill Trust strongly concurs. The National Trust also acknowledges that some areas have inherently resistant price points, meaning 'expensive areas will simply remain expensive'. We don't want to risk losing our history and irreplaceable heritage for no collective gain to the community and believe it's a misconception that such changes in planning rules will make housing more affordable.

Recent headlines report:

- Lending to property investors reached a six year high as a share of total home lending. ABS figures show over 36% of all housing finance in December went to investors. (February 14 SMH)
- Consultants Urbis, on behalf of AirBnB, concede there is a 'positive correlation' between 60,000 short-term AirBnB rentals and poor housing affordability in NSW. (February 12 SMH reported)
- Finance expert, Alan Kohler calls Australia's housing mess 'The Great Divide' in his recent Quarterly Essay. 'The place we call home and raise families in has turned into speculative investment assets due to years of policy failure and greed'.
- Further, Kohler writes 'after 9.5 years of production time, developers still held 76.2% of their land vacant'. It's called land banking' (page 81, a study by Prosper Australia)

And then there are factors like Negative Gearing, Immigration and Foreign Investors.

The reasons we got to where we are now are complex and it's simplistic to think that blanket planning controls will undo years of policy neglect and incentives that entrench housing as an investment and have led to unaffordable house prices and inequality.

Our homes, our neighbourhoods our sense of place and community and our precious natural environment are now under threat due to these changes. The people of Hunters Hill also have rights. A home is just that, a place to shelter, to raise a family, a place to feel safe. It's not just an investment opportunity. For many it is their only asset. To not have a say against changes that allow a neighbour to build a multi-story unit block overshadowing and reducing the amenity of your single level dwelling is a denial of rights.

The Hunters Hill's Local Environmental Plan is currently being reviewed. Much community consultation and serious considerations for future climate and sustainability has gone into this document, only for these protections to be now totally ignored?

Over-development and high-rise will ruin this unique natural environment with its harbour, river foreshore topography and natural bushland settings that also benefit the wider Sydney communities who visit to enjoy this special place. Increased traffic feeding into an already congested single road access to a central crossroad location city bound and northbound will result in a gridlocked system, made even worse by Victoria Road blockages due to West Connex.

It is unthinkable that future generations and historians may record in 2024 that a developer driven approach was taken by NSW State Government's Department of Planning to increase housing density, rather than a rational and objective process utilising experienced Council knowledge with input from local professional community groups and those who were democratically elected to represent them. Let's work together collaboratively to find a better solution and to ensure that our unique heritage areas and precious green environment can still be preserved to be enjoyed by future generations.

Yours sincerely



Karyn Raisin
President
Hunters Hill Trust