

23 February 2024

NSW Department of Planning and Environment  
4 Parramatta Square  
12 Darcy Street  
Parramatta NSW 2150

[Have Your Say Online Submission](#)

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

To whom it concerns,

The Cooks River Alliance (CRA) is pleased to provide a submission in response to the proposed changes to the planning system to encourage more low and mid-rise housing. The CRA is an alliance between councils in the Cooks River catchment – Bayside, Canterbury-Bankstown, Inner West, and Strathfield – and Sydney Water. This response is consistent with the overarching mission of the CRA, to “*Enhance the wellbeing of our community by taking a long-term, holistic, and cooperative approach to managing the health of the Cooks River*”.

We understand that the proposed reforms seek to:

- Allow dual occupancies (two dwellings on the same lot) in all R2 low density residential zones across NSW.
- Allow terraces, townhouses and 2 Storey apartment blocks near transport hubs and town centres in R2 low density residential zones across the Six Cities Region.
- Allow mid-rise apartment blocks near transport hubs and town centres in R3 medium density zones across the Six Cities Region.

The CRA recognises that in order to secure the health and well-being of individuals and communities in urban areas, it is essential to provide ready access to naturalised space (‘blue-green’ spaces)<sup>1</sup>. As such, the protection and enhancement of the Cooks River not only has environmental benefits, but important social and economic benefits as well.

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<sup>1</sup> Population Wellbeing and Environment Research Lab, Wollongong, NSW: <https://www.powerlab.site/>.

The CRA recognises that Australia, including NSW, is facing a housing crisis. It also recognises that everyone needs to play their part in addressing this crisis. However, we are concerned that the proposed reforms will have detrimental environmental and social consequences that may circumvent careful planning undertaken by our member councils to ensure the long-term health of our communities in the face of increased urban densification and the growing effects of climate change. This includes the incorporation of blue-green space and water sensitive urban design (WSUD) elements into the urban landscape that provide healthy living space whilst protecting the Cooks River from further degradation. These plans also account for the Cooks River and its tributaries as blue-green corridors that can and will provide important human liveability and ecological amenity.

### **Risks to the Cooks River (Environmental)**

The Cooks River is Australia's most urbanised river system, and one of the first river systems to be developed since colonisation. As a consequence, the Cooks River has suffered more than most river systems. However, thanks to strong community commitment that continues to this day, the Cooks River was brought back from the brink during the 1980s and has made great progress since. It now provides habitat to native and migratory species, and desperately needed green-blue space to some of Australia's most urbanised suburbs.

Without due consideration to the impacts of the proposed reforms on the Cooks River and its associated tributaries, we are deeply concerned that these changes may circumvent many of the gains made in transforming the river from an urban drain to a healthier river system that provides a number of environmental, social, and economic services to the community. These concerns include:

- A significant increase in impermeable (hard) surfaces, resulting in higher frequency and flow energies of stormwater runoff into the Cooks River and its tributaries, exacerbating eco-hydrologic impacts<sup>2</sup> and waterway bank erosion and sedimentation<sup>3</sup>.
- A construction boom that leads to significant increase in sedimentation of the Cooks River and its tributaries<sup>4</sup>.

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<sup>2</sup> Templet, Paul H., and Sorensen, Jens. (1995). *Eco-hydrological consequences of environmental degradation: Hydrology, ecology and environmental impacts*. In: Singh, V.P. (eds) *Environmental Hydrology*. Water Science and Technology Library, vol 15. Springer. Dordrecht.

<sup>3</sup> NSW Government (2019). *Waterway Health*. Accessed 16 February 2024: <https://www.environment.nsw.gov.au/topics/water/water-quality/protecting-and-managing-water-quality/waterway-health>

<sup>4</sup> The regional 'Get the Site Right' program reveals that a significant proportion of builders do not implement adequate construction controls.

- Increased population resulting in increased potential for litter and other sources of pollution (e.g. nutrients, oil and grease, and toxic trace metals and bacteria<sup>5</sup>), as well as increased likelihood of raw sewage entering the river due to heightened pressure on already overburdened sewage systems.
- Increased traffic and public transport pressures, resulting in increased potential for petrochemical and heavy metal pollution<sup>6</sup>.
- Increased risk of existing naturalised space being '*loved to death*', as a rapidly growing population competes to access already limited naturalised space within the Cooks River catchment. This includes the degradation of exceptional patches of conserved and restored habitat along the Cooks River and its tributaries.
- Reduced ecological climate change resilience of an already highly pressurised river system.

### Risks to the Cooks River community (social)

The CRA member organisations along with state government agencies have worked diligently with the community for several decades to realise the potential of the Cooks River to provide unique passive and active recreational space, as well as improving ecological services to the region. Such efforts are in line with NSW state government policy, promoting lifelong health and wellbeing for the community<sup>7</sup>. However, if the proposed reforms go ahead without due consideration of their implications, we are concerned that these gains will be much reduced because of the declining health of the river, resulting in urban development that does not provide adequate blue-green amenity to its citizens.

Flow on social implications will likely include:

- The overcrowding / overuse of existing blue-green space currently provided by the Cooks River and adjacent areas.

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<sup>5</sup> EPA Victoria. (2021). *Types of stormwater Pollution*. Environmental Protection Authority Victoria, Melbourne: <https://www.epa.vic.gov.au/for-community/environmental-information/water/stormwater/stormwater-pollution-types>.

<sup>6</sup> Transport for NSW. (2024). Land, water and contamination. NSW Government. Accessed 19 February 2024: <https://www.transport.nsw.gov.au/operations/roads-and-waterways/environment-and-heritage/land-water-and-contamination>

<sup>7</sup> NSW Ministry of Health. (2020). *Healthy Built Environment Checklist – A guide for considering health in development policies, plans, and proposals*. NSW Government, St Leonards.

- Potentially over-riding well researched local councils' planning strategies designed to open up additional blue-green space whilst increasing housing (e.g. the acquisition of land for public access where current property boundaries extend to the river bank).
- Reduced community wellbeing, both mentally and physically due to a reduction in blue-green space and active transport opportunities relative to population growth.<sup>1,7</sup>
- Reduced resilience to climate change due to increased flooding, tidal and coastal inundation, and urban heat (urban heat is already a critical issue for many suburbs within the catchment of the Cooks River)<sup>8,9</sup>.
- Increased incidence of disease due to heightened exposure to polluted waters, including raw sewage.
- Potential increases in delinquent behaviour and higher rates of crime brought about by development inconsistent with human psychological needs (i.e., lack of opportunity to access nearby blue-green space)<sup>7,10</sup>.
- Increased costs associated with public health services and crime prevention<sup>7</sup>.
- Costs associated with the correction of urban planning miss-steps brought about by rapid increase in urban density without due consideration to environmental and social realities (typically, the cost of retrofitting is higher than incorporating blue-green space and waterway protection measures at the planning stage).
- Intergenerational opportunity costs in terms of liveability and unrealised economic development of the river (e.g., polluted / heavily built out rivers do not encourage the development of 'river economies' that encourage retail and hospitality ventures).

## Housing reforms as an opportunity to re-design our urban spaces to the benefit of all

While the above challenges seem daunting, the current need to establish additional housing may present an opportunity to redesign our cities to better serve residents whilst addressing housing shortages. By rethinking how we plan and build medium and high-density housing, it is quite possible to increase housing and enhance the liveability of our urban areas whilst protecting our urban rivers. Incorporating principles like 'Streets are ecosystems' and WSUD into our buildings

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<sup>8</sup> AdaptNSW. (2024). *Climate change in Metropolitan Sydney*. NSW Government, Accessed 19 February 2024: <https://www.climatechange.environment.nsw.gov.au/my-region/metropolitan-sydney#:~:text=Climate%20change%20is%20affecting%20the.key%20to%20adaptation%20and%20resilience.>

<sup>9</sup> NSW DPE. (2023). *Average tree canopy cover, heat vulnerability index and urban heat island of suburbs in greater Sydney*. NSW Department of Planning and Environment, NSW Government, Sydney.

<sup>10</sup> Schertz, Kathryn E., Saxon, James., Cardenas-Iniguez, Carlos., Bettencourt, Luis M., Ding, Yi., Hoffman, Henry., Berman, Marc G., (2021). *Neighborhood street activity and greenspace usage uniquely contribute to predicting crime*. npj Urban Sustainability **1**, 19.

and public spaces<sup>11</sup> provide the means to achieving such outcomes, as well as helping us build-in long-term climate change resilience and water security into our communities.

One way to achieve this is to assist local councils to deliver their existing plans that already take these factors into account, while providing for increased housing. These plans represent years of dedication to community engagement and the inclusion of best urban planning practice in order to provide healthy living space that effectively balances increased population density with the liveability. For example, Canterbury-Bankstown Council's Master Plan for Campsie<sup>12</sup> incorporates many of the critical elements recommended by the NSW Government to ensure healthy communities and a healthy Cooks River. This includes the upgrading of existing open space, as well as the creation of new green spaces, whilst still achieving higher rates of residential space. Importantly, the Master Plan incorporates overt consideration of Cooks River and its foreshore, taking advantage of this once maligned waterway, turning it to the benefit of the community and the local environment. The Master Plan links it to Canterbury town centres to provide opportunities for active transport (such strategies also help to reduce traffic issues). It also recognises the opportunity to incorporate WSUD, with the intention of transforming Campsie into a "water sensitive precinct" (pg. 77) to better manage and retain water in urban areas to improve liveability, biodiversity, and climate change resilience.

## Summary

The CRA member organisations recognise that NSW is facing a housing crisis. As socially aware and responsible councils, we also recognise that there is a need for us to respond to this crisis, hand in hand with the State Government. However, we are concerned that allowing the blanket proposed reforms without due consideration of the impact on liveability and our urban rivers could have unintended consequences that will adversely affect the social and economic wellbeing of the region into the future. This problem is particularly acute for suburbs within the Cooks River catchment which have some of the lowest levels of access to naturalised blue-green spaces in NSW<sup>9</sup>. Accordingly, we recommend that the NSW State Government work closely with our member councils such that their urban planning is not circumvented. By doing this, the State Government can take advantage of their local knowledge, and the community engagement and

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<sup>11</sup> NSW Government. (2023). *Streets are ecosystems. Movement and Place*. NSW State Government. Accessed 19 February 2024: <https://www.movementandplace.nsw.gov.au/design-principles/design-road-and-streets-guide/street-functions/streets-are-ecosystems>

<sup>12</sup> CB City. (2023). *Campsie Town Centre Adopted Master Plan*. Canterbury Bankstown Council, Bankstown: <https://www.cbcity.nsw.gov.au/development/planning-for-the-city/master-plans/campsie-town-centre-master-plan>

detailed planning that these councils have undertaken to ensure people can find affordable, healthy places to live.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Clare Raffan".

Clr Clare Raffan  
Chair  
Cooks River Alliance.