

To: Australian Government
Productivity Commission

Re: Productivity Commission's 2026 Overview - Interim Report – Housing supply regulation

I have perused the above overview report and am concerned about its potential impact on planning systems that have served Australian communities well over a long period of time.

The report focuses on identifying regulatory impediments to the rapid construction of new housing, and in doing so gives scant consideration to the impacts of the proposed strategies on affected existing residents and the wider community.

I do not agree with the premise that homes in desirable locations are unaffordable per se. They are obviously affordable to some people, though they are more expensive than those in less sought-after locations. This has always been the case. People's housing choices are always limited by their incomes and circumstances. It has been common practice to purchase a more modest home in a less desirable area and aspire to move up within the housing market. As the report recognises, existing residents inevitably vacate their homes in the more expensive suburbs and younger owners move in, making space at the lower end of the market. It seems to me that the problem is not that we don't build enough homes in areas where people want to live. It's that we have not built enough homes overall, over a long period of time. Furthermore, building more homes in desirable areas will not necessarily make them affordable to those on low incomes, because their value is largely determined by the desirability of the area itself.

The first principle enunciated in the Interim Report is to adopt a 'Build' mindset. The report explicitly states that existing regulations are constraining housing supply. Most of the recommendations involve relaxing or removing the perceived constraints. This immediately raises concerns in my mind in relation to living standards for new residents and community protections for the remainder of the community.

Even the report concedes that 'some regulation is necessary to ensure the safety, quality and liveability of new housing.' The question is what constraints can be lifted without compromising those factors. I have commented below on some of the proposed planning directions that I think would have adverse impacts in both the short and long term. Existing regulations have evolved through experience. They have been informed by significant expert input and have been tested in practice.

A key aspect of development that the report does not consider is its impacts on existing communities. Much regulation has at its core the protection of existing residents and the community as a whole, and the preservation of desirable aspects of our suburbs and housing stock. The report denigrates the concept of considering neighbourhood 'character' when determining the suitability of a development and gives no weight to the effects on nearby residents. This represents a failure to protect the public interest as a whole. Most people consider the individual characteristics and 'feel' of their urban environments to be of critical importance. They contribute to the liveability and appeal of our cities and towns.

Australia has a distinctively open, bright and sunny ambience in comparison with other countries. People who love living here do not want their cities turned into a version of Hong Kong or Monaco or New York. Where land-use controls have prevented development altogether in the past, I would contend that there was good reason. For example, the community actions that prevented the destruction of The Rocks in Sydney or led to the creation of Sawmillers Reserve, are now applauded for the permanent benefits they achieved.

I offer the following comments in relation to specific reform directions proposed in the report.

2.1 – Allow up to 3-storey developments across most residential land

This is not a desirable strategy. Such a blanket change in policy ignores longstanding planning controls that are relied upon by communities. Those controls have been developed over time and adopted after public consultation. They take into account local factors such as services, facilities, demographics and topography. They are an integral part of what makes communities liveable and ensure a good level of amenity for both existing and new residents.

The randomly-located three-storey walk-ups of the 60's and 70's are examples of the impact of a global abandonment of local regulatory controls. As I understand it, developers were essentially allowed free rein to build wherever they chose, without regard for the local environment or neighbouring properties. That regime was stopped as a result of public outcry, but the structures built then remain a blight on the urban landscape of cities like Sydney. They are a testament to a comprehensive failure by authorities to properly plan and manage development.

I note that if this direction 2.1 were adopted, it would be essential at least to adjust the setback controls to account for the impacts of the additional height, for example in terms of privacy loss and solar impacts for neighbours.

In my opinion, it is critical that such a change to existing planning controls not be made globally, without undertaking the strategic planning necessary to protect valued urban environments against permanent destruction. Wholesale inappropriate development must not be allowed.

2.2 - Allow mid-rise or high-rise apartments in high-demand areas

To enshrine as policy the concept that a massive amount of additional housing must be constructed in high-demand areas is naïve and impractical. Everyone in Sydney, for example, would prefer to live in a beachside or harbourside suburb. That is clearly not possible, and it is not practical or desirable. Very few such suburbs are at transport hubs. In fact, they are usually destinations 'at the end of the line' in public transport terms. Often, the essential services in such areas have limited capacity, because they are relatively isolated and already densely populated. Major shopping areas and office space are usually located elsewhere.

Higher density development around shopping precincts, transport hubs or employment centres would clearly be beneficial. However, the areas to be developed need to be carefully selected and appropriate height constraints need to be applied.

The NSW government's Low and Mid Rise housing (LMR) policy takes a broad-brush approach to implementing such a strategy, overwriting existing planning controls and disregarding local conditions. Its provisions are uncertain because the areas designated for uplift are not mapped in detail. The determination of permissible building heights has become a contentious issue, fought out between developers, local authorities and the public. Another area of uncertainty is how the LMR policy interacts with existing planning controls, although it explicitly states that these still require consideration in decision-making.

The NSW policy has generated widespread community backlash. Many hundreds of submissions have been lodged objecting to development proposals that contravene all planning controls other than the maximum allowable building height and bulk. The result of simply superseding existing controls without considering any local considerations in the affected areas has, predictably, been delays, re-design and requests for third party reviews.

These problems can be overcome by undertaking robust planning processes to identify areas suitable for multi-storey uplift, including considering local environmental and demographic conditions. Communities should be consulted to obtain a consensus view. Local government authorities are best placed to undertake these processes, and this has now been done in a number of LGAs in Sydney. As a result, both developers and the community in these areas have a shared understanding of what is allowed. If the proposals submitted are consistent with the agreed planning controls, there will be minimal grounds for objections.

2.3 – Reduce or remove minimum lot size requirements

This appears to me to be a poor idea. There are many large developments on the outskirts of our major cities where lot sizes have been reduced, and the outcomes are patently unsatisfactory. The homes in these areas typically have no green space around them, little privacy from neighbours and are accessed by narrow, choked streets. In terms of liveability, they are clearly inferior to homes in established neighbourhoods. There is already an outcry among some environmentally aware commentators about the lack of tree canopy in these areas and the creation of heat sinks which compromise liveability and make air-conditioning an essential (but expensive and environmentally damaging) requirement.

Minimum lot size requirements serve a purpose and reducing them will erode the beneficial amenity provided by free-standing homes, which I believe are still the most sought-after items in our housing system.

2.4 – Allow residential development in commercial zones

This seems to be a practical idea. Residential development is already found in many shopping precincts, for example above strip shops. They are well accepted where suitable heights are maintained and setbacks at higher levels ensure that adequate sun and light reach the street.

2.5 – Review, reduce and remove land-use controls

This strategy involves removing land-use controls that ‘do not adhere to best practice principles’. I take this to mean that controls should not be removed if they have proven utility in terms of safety, liveability or amenity for residents and the community at large. The issue, obviously, is to properly identify what controls are required to ensure ‘best practice’.

I do not think it is a good idea to reduce the off-street parking requirements for apartment blocks, for example. The current requirements in NSW already appear to be insufficient. Most families have at least 2 vehicles and I understand the average requirement per apartment is less than this. The result, visible in many locations around our cities, is that many cars are parked on public streets, even around new multi-storey developments.

The proposal to remove heritage listing for architecturally and aesthetically high-value areas is short-sighted. I do not believe it would be supported by the community in any area where it currently applies. Residents in our cities do not want all their established, low-rise, well vegetated, visually attractive suburbs, with their interesting and varied architecture, demolished and replaced by masses of multi-storey apartments with no character, little green space, diminished access to light and sun and limited privacy.

Heritage listing of single properties is problematic, even for developers. Locating a multi-storey development adjacent to a low-rise heritage dwelling causes issues for prospective developers and for the occupants of the heritage item. Adjacent development proposals are generally out of scale with the existing heritage item. This can lead to well-founded objections about aspects such as visual

dominance, overshadowing, loss of solar access and loss of privacy. The concept of protecting a heritage item is a pretence if the item is allowed to be swallowed up in a sea of apartment buildings.

For the owners of a single heritage property in an area zoned for development, there is considerable frustration and anguish involved in being unable to develop their own site while having the financial and aesthetic value of the property diminished by adjacent incongruous and often overwhelming development.

I expect the proposal to disregard any 'character' constraints for new developments would be resisted vigorously by most local communities, because existing urban environments are generally highly valued. It is one thing to demolish old industrial estates and erect 8 and 10-storey buildings in their place. It is another to insert such large-scale buildings on small parcels of land within an established area of low-rise homes. The latter generally causes severe loss of amenity for existing residents and inevitably leads to community resistance. If the intention is to insert a piecemeal collection of multi-storey apartments within an existing established residential area, then community outrage is the likely outcome. This is currently occurring in many areas of Sydney, as recent media reports confirm. An outraged community will fight every proposal with every means at its disposal. The result is delay and re-work, as a minimum.

Proper community consultation at a local level is essential if a review of heritage precincts or a change of 'character' are proposed. Every suburb has its own character, and this is in part what makes our cities diverse and liveable. Planning systems have taken 'character' into account for many decades and removing that consideration from the development approval process will ultimately destroy the urban environments we currently enjoy and treasure.

In areas of Sydney designated for LMR development, proponents are claiming, without community endorsement, that the 'desired future character' is a wall of 8 to 10-storey apartment blocks on both sides of the street, with reduced street setbacks and minimal space between buildings. This is causing a furore, with community groups forming and individuals spending enormous amounts of time and energy attempting to prevent the wholesale destruction of their living conditions.

2.6 – Relax or remove built-form controls that limit flexibility and choice

Built-form controls have been progressively developed over time, based on expert consideration of overall benefits, the public interest and community feedback. Extreme care needs to be taken if the controls enshrined in public documents are to be amended. They have been relied on for many years to balance the needs of different parties affected by a development proposal. They provide a degree of certainty for existing residents, prospective owners and developers alike.

The NSW Government's Apartment Design Guide (ADG), for example, is a robust guide that has been successfully applied for more than a decade. The specified controls protect existing landholders and assure new owners that they will be afforded a level of amenity comparable to others in the community. For example, the setbacks prescribed for multi-storey buildings are essential to preserve a level of privacy, access to light and sun and air and pleasant living spaces. Reducing the required setbacks in particular would be a regressive move, with significant negative long-term impacts.

Removing restrictions on the minimum size of balconies would be disastrous in terms of liveability and amenity. Balconies are often used as living spaces. They provide access to fresh air and sunshine. There is no point having a 'balcony' that is only wide enough to stand on, and where it is not possible to spend 'quality time'.

Reducing the minimum amount of storage in new apartments would be similarly short-sighted. The regulated storage spaces have been carefully thought out and provide a reasonable amount of space to ensure liveability for average homeowners. Competent architects in each jurisdiction will be well aware of the allowable minimums, so this should not delay the preparation of designs. The cost savings that can be achieved by skimping on storage space would be unlikely to ultimately result in any overall benefit.

Reducing the built form controls that affect liveability for residents, and allowing developers to make all the choices, is not ideal. Developers will always look to cut construction costs. The strategy may well result in dwellings of inadequate size and space. Many people may end up living in conditions they would not have chosen if they had been given the option of well-researched, tested designs and layouts. In the long term, the result will be a decrease in the quality and liveability of the housing stock on offer in this country.

There is a similar risk that, if built form controls are ignored at the whim of individuals, the resulting buildings will be unsuitable or undesirable for future occupants. It is one thing for an individual building a home for themselves to decide to omit parking (for example because they do not drive) or reduce storage space (for example because they are elderly and unlikely to share the home with anyone else). However, it is always likely that a home will be sold to someone with different needs. Minimum standards assist in ensuring properties are easily transferable to new owners. Idiosyncratic dwellings are not attractive to everyone, and if a stock of under-equipped homes is generated, it may not sustain a robust market in the future.

Ultimately, it is important that a certain level of amenity be included in all homes. There has been talk of developing standard designs for homes, and I think this is a good idea. It would save on design costs and ensure a reasonable amount of space and comfort for anyone who lives in the home. It would also make the home appealing to more potential future buyers.

MAKE APPROVALS FASTER AND EASIER

This objective will not ultimately benefit the community if it is applied without due consideration of all the relevant factors. The controls that are often labelled 'red tape' or 'green tape' have evolved to protect the interests of communities, including existing residents and new ones.

Delays to approval processes can obviously occur when proposals do not comply with known controls and limitations. I have personally seen and commented on several recent proposals for apartment developments under the NSW government's LMR policy. None of those proposals complied with the relevant planning controls. In fact, all of them exceeded even the very generous additional height and bulk limits permitted under the current housing policies. Had they complied, it would have minimised the grounds for objections and the approvals process would have been smoother and faster.

It seems to be standard practice for developers to apply to exceed permissible limits and submit 'exception' reports claiming that it is unreasonable and unnecessary to require compliance. In every case I have seen, compliance with height controls would have reduced the building height by a whole floor, thereby markedly reducing the impacts on existing residents. It appears to me that compliance would have been eminently reasonable and necessary.

Non-compliance with setback controls is another common failing in the development proposals I have seen. Where this occurs, there is always unacceptable impact on neighbouring properties.

Landscaping is another key area where developers appear unwilling to comply with the minimum requirements. Deep soil planting in particular is to the detriment of the urban environment. Shrubs in planter boxes are no substitute for established trees and substantial gardens.

3.1 – Consider infrastructure requirements ... early through strategic planning

This aim is obviously worth pursuing. There are many examples of subdivisions on the outskirts of our cities where people are stranded without adequate services and facilities, due to poor forward planning.

3.2 – Expand the use of fast-track pathways to assess simple developments

This strategy could be effective in speeding up approvals, but ‘simple’ developments need to be properly defined. Also, as identified in the report, the decision as to whether a project is suitable for an accelerated approval pathway needs to be ‘risk-based’.

I would suggest that ad hoc infill development in established communities would never be appropriate for a fast-track pathway, due to the many and varied potential impacts. As mentioned above, it is essential that proper consideration be given to existing residents if an area is to be forever changed by a development and they are to be disrupted by the construction process. In such areas, planning requirements designed to protect the community and the environment must still be satisfied.

It would assist if approval authorities specifically identified, in advance, sites where the requirements for investigations and documentation for certain aspects of the development could be reduced. This would depend on the location of the site, and the potential of the proposal to impact the surrounding community and environment. Sites like the former White Bay power station or Wentworth Park racetrack would, I expect, be suitable for fast-track processes. Infill development in Rose Bay or Woollahra or Lindfield would potentially negatively impact many people and should be subject to the more rigorous processes that communities expect.

Standard designs could assist, but developments would still need to be subject to accepted planning controls. It should always be mandatory to comply with regulated setbacks, heights and floor space ratios. For high-rise developments in NSW, these are well documented in the ADG and well known to experienced architects, developers and builders. Achieving compliance should not delay the approval processes if the applicable controls are taken into account from the outset.

3.3 – Use state-significant pathways to approve developments with a clear need for state-led assessment

Such pathways should **only** be used for major projects with demonstrable public benefit.

Under the current policies in NSW, developers appear to be artificially inflating the estimated costs of small apartment buildings (for example by including golf practice rooms, saunas, wellness centres, etc) in order to use an accelerated pathway via the Department of Planning. This is clearly an attempt to circumvent local authorities who are aware of local conditions and long-standing planning controls and can be expected to attempt to address and alleviate the concerns of local residents. It also avoids having to comply with the often more stringent specific controls included in Council Development Control Plans, whose purpose is to protect the local communities and preserve valued urban landscapes.

4.1 – Coordinate strategic planning for infrastructure with housing objectives

This is obviously a worthy objective. Imposing an overarching state-wide overlay on existing functioning local planning systems without consultation, as has been done via the LMR policy in NSW, is not the best way to achieve the accelerated construction of thousands of new homes. This has become very apparent in recent months, as the community discovers the implications and attempts to fight for its urban environment.

Several local government authorities in NSW have now prepared strategic plans for development within their areas, incorporating the number of new dwellings required by the state government. Community consultation has been held and the strategic plans are integrated with planning systems that have been used to manage development for many decades, without generating community outrage. If adopted, they should help to streamline the regulatory processes and speed up development approvals.

Information Requests:

I note that the requests for information seem to be specifically directed to developers, whose responses will naturally favour their own interests. In most cases, I do not believe those interests will coincide with the interests of affected communities.

Conclusion

In summary, I would observe that adopting a 'Build' mindset while disregarding settled, well-integrated planning controls, is almost guaranteed not to achieve the aim of constructing large numbers of new homes in a limited time. The most efficient way forward, in NSW at least, would be to develop and adopt locally based strategic plans that accommodate the required development in defined areas of higher density development, taking into account community concerns and integrating the strategic plan with existing functioning planning controls.

[Redacted]

Appendix: My own situation – a case study

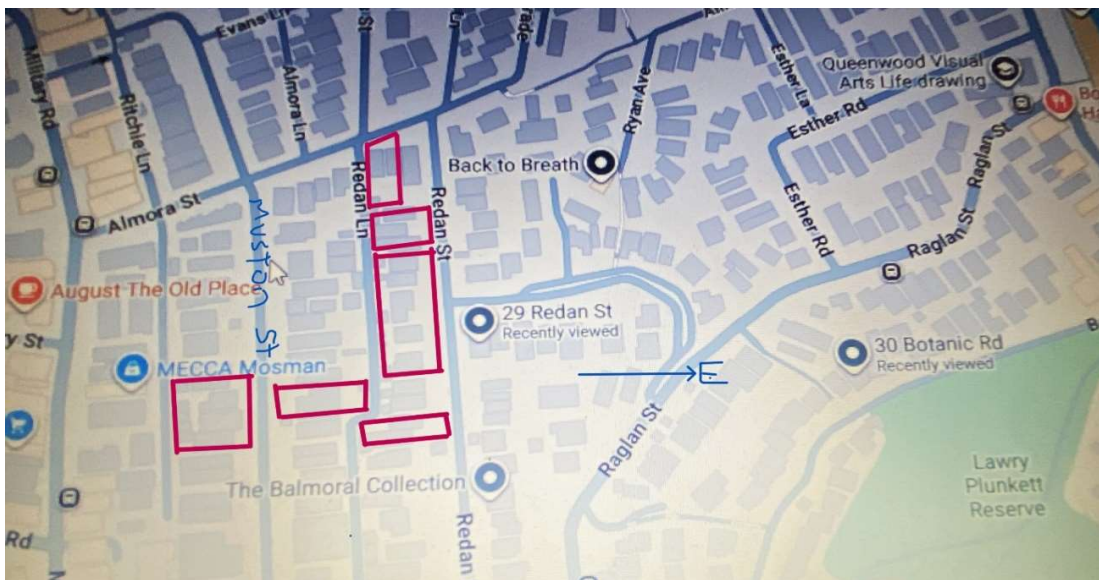
As a resident of Mosman in Sydney, I am experiencing first-hand the turmoil created by new State government housing policies that appear to adopt some of the strategies identified in the Interim Report without taking local conditions and long-standing planning controls into account.

The NSW government's LMR policy is intended to encourage multi-storey development in 174 separate areas by resetting the height and bulk limits for apartment buildings within 800 metres 'safe walking distance' of mapped 'Town Centres'. Development up to 6 storeys is allowed within 400 metres from the boundary of a 'Town Centre' and up to 4 storeys is permitted in the outer area. The height limits supersede existing planning controls (as proposed in directions 2.1 and 2.2 in the interim report). The situation is complicated by a separate policy that permits an additional 30% uplift if a certain percentage of 'affordable' housing is included in the proposals.

The policies have introduced great uncertainty into the planning system. Firstly, there is the issue of identifying a 'safe' walking route for pedestrians in order to determine the permissible height and bulk of a development. There have already been many arguments between residents/Council and developers as to whether laneways with no pedestrian facilities are 'safe'. Very significantly, it is also not clear to what extent existing planning controls determine whether a proposal is approved, although the LMR policy explicitly states that they require consideration. Developers seem to be assuming that existing controls are, in effect, irrelevant if increased height and bulk limits are achieved. This is clearly in their interests, but it is causing enormous angst in the local community.

It has been left up to developers to decide where to site their proposals within the loosely designated uplift areas. Not surprisingly, in Mosman they have elected to construct the first of the new apartment blocks in the most profitable locations, on the eastern edge of the area identified for uplift, high up on the slopes above the foreshore. Here, the new buildings will have sweeping views across the harbour. They will never be built out because development further east, down the slope, is prohibited from being more than 2 storeys high by existing, unchanged planning controls.

Unfortunately for me, I live on the eastern side of the uplift area. Six separate developments have so far been proposed within 200 metres of my home, which is a duplex set in a pleasant, well vegetated low-rise medium-density residential area with varied housing types. The marked-up *Google maps* excerpt below shows in red outline where the new developments are proposed.



Five of the proposed developments are between 8 and 10 storeys high, including the one on the eastern side of Muston Street at No 65. The sixth, the most southerly, is proposed to be 4 storeys.

The proposed developments will completely block my views to the east and north-east, and most of the outlook to the south from my east-facing balcony will be hidden by a nine-storey wall with protruding balconies. A visual impact assessment for the proposed development directly to the east of my home includes images relating to the view from the apartment upstairs. The photograph on the left shows the current view, which is also seen from my balcony. The image on the right shows the anticipated outlook if the development proceeds. It is obvious that the impact could not be more disturbing. It is rated as 'devastating' by the visual consultants.



Anyone affected so badly by a development proposal would surely do everything possible to avert the shocking impact. We are told that every area needs to accept its share of the extra housing and have been labelled 'NIMBYs' for opposing the extent of proposed development. It does seem to me, however, that I am being expected to accept far more than my fair share of the negative impacts.

I am not the only resident in the area who is similarly affected. On the eastern side of Muston Street, every dwelling to the north of the proposed development at No 65, up to the corner of Almora Street, will lose its harbour view. This will impact at least 25 homes. In addition, we will all suffer a distressing loss of sunlight and daylight. Most residents can currently watch both the sun and the moon rise over the horizon. If the proposal proceeds, we will not see the winter sun on our eastern balcony before about 10 am. The effect on our living conditions will be profound. The sea breeze that provides relief from the summer heat will be blocked and the privacy we enjoy in our main, east-facing living areas will be lost. If the whole area develops as envisaged by developers, our open, sunny, leafy streetscape will become a tunnel with no early morning or late afternoon sun and a funnel for blustery southerly winds in winter.

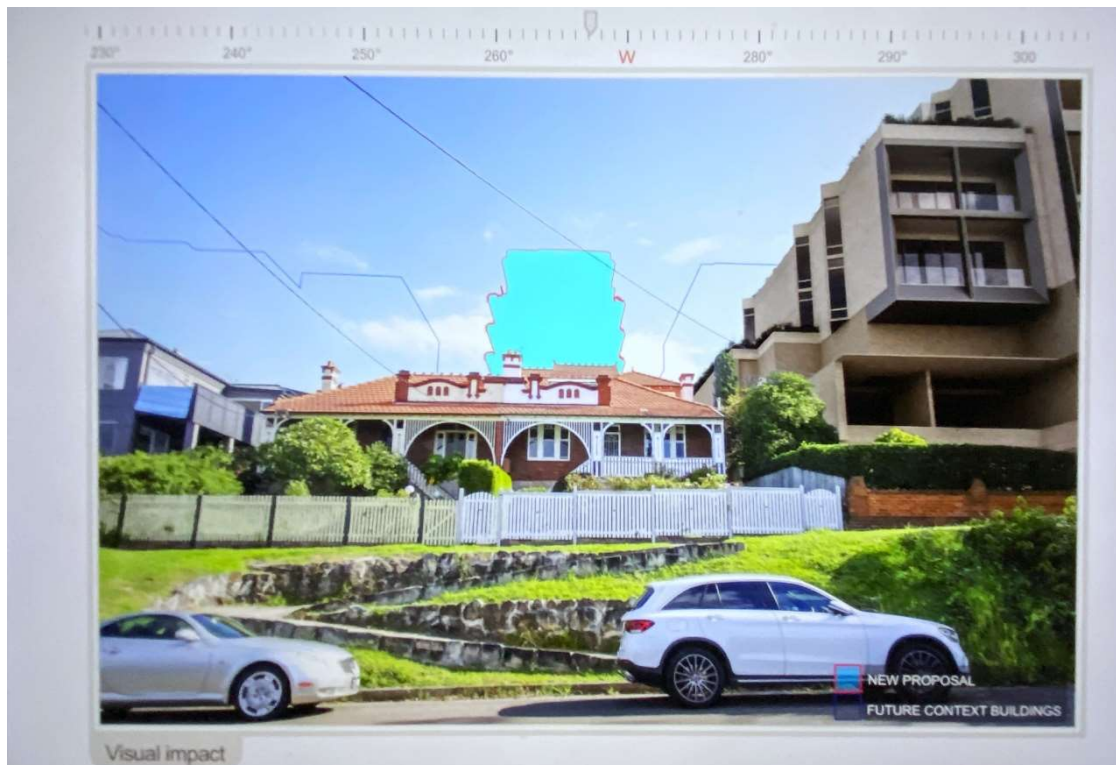
There is also a major financial impact involved for affected home-owners. Based on recent sale prices and opinions from a number of agents, I expect my property will be devalued by more than 30%, or around \$3 million. If I cannot bear to stay in this property, which was purchased largely for the view,

then I will not be able to afford a replacement of similar value. I will certainly not be able to afford an apartment in the new building that will block my view. In essence, what will happen is that a developer will appropriate the view I currently enjoy and sell it to someone else at an exorbitant profit, while irretrievably damaging my financial situation and my retirement lifestyle.

The insult is compounded by the fact that, until now, views from homes on the eastern side of Muston Street were protected because the area to our east was part of the Mosman Scenic Protection Area (SPA) where development above 2 storeys is not permitted. Almost 50% of the area in the lots to our east is actually included in the mapped SPA. Current residents of Muston Street (and those further west whose amenity and property values are also impacted) purchased their homes in the knowledge that their asset value would be protected by the existence of the SPA. The LMR policy overlay has emboldened developers to ignore this constraint, despite the fact that the SPA has not explicitly been superseded by the new planning controls. This is an example of what can happen when existing planning controls are overturned by ill-conceived, poorly implemented global changes (see my comments on proposed directions 2.1, 2.2 and 2.5).

The issue I mentioned above in relation to single heritage-listed properties (direction 2.5) is highlighted by the existence of two heritage-listed semi-detached cottages to the east of Muston Street. The image below, taken from the visual impact assessment for a proposed development at 65 Muston Street, illustrates the appalling impact of two of the currently proposed developments on the aesthetic value of the heritage cottages. The building on the right of the image (which is to the north of the heritage properties) DOES NOT yet exist. The structure shown in light blue behind to the cottages (to their west), is the proposed apartments at 65 Muston Street.

The developer's vision of future development is shown in blue outline. I note that a four-storey apartment block has already been proposed on the adjacent lot to the south. The damage to the architectural value of the heritage cottages is clear to see.



The current proposals would also have severe negative visual impacts for the general community. If extensive uplift occurs as predicted by developers, the natural ridgeline above the foreshore will be topped by a wall of apartment buildings, distinctive because of their height, bulk and predominantly glazed facades. They will be visible from the foreshore at Balmoral and anywhere further east. The images below, taken from a visual impact assessment for the proposed development at 65 Muston Street, illustrate why the community objects so strongly to the potential uplift that would comprehensively destroy the 'character' of the suburb (see my comments on proposed direction 2.5) and damage its visual appeal from publicly accessible areas.



A view of the Balmoral slopes from the swimming baths at Balmoral



The same image showing the anticipated wall of apartment developments on Redan and Muston Streets

Now that they realise the implications of the LMR policy, many communities in NSW have become incensed and have mobilised to try to prevent what they see as unacceptable and destructive development. Each development application made under the LMR policy in Mosman has literally been met with hundreds of objections.

Because many of the proposals have been submitted as State Significant Developments (SSDs), under a fast-track approval pathway, affected residents do not know what options are available for them to attempt to ameliorate the impacts on their lives. We have been disconcerted and somewhat shocked to learn that the community's objections have been forwarded directly to the developers for analysis

and response. The developers have predictably produced follow-up reports that briefly summarise the concerns, downplay their significance and make slight design changes that purport to address the issues raised. Community members have not been invited to comment on the developer responses to our objections, and we are anxiously aware that the developers have in effect been given the opportunity to make the final representations to the decision-makers. We do not know whether it will be possible to apply to a disinterested third party such as the NSW Land and Environment Court in order to have our concerns properly ventilated. The existence of a fast-track pathway directly to government (along the lines of what is proposed in direction 3.3) has only increased the level of stress and angst felt by the community. It has also increased the likelihood that development unacceptable to the bulk of the community might ultimately proceed.

In the case of the developments in my vicinity, using an SSD pathway can enable developers to ignore the requirements of the Mosman Development Control Plan (DCP). If the Mosman DCP applied, the developments to the east of Muston Street could not have been proposed in their current form due to specific landscaping constraints that apply in Redan Street to our east. This is yet another community protection that has been deliberately dismantled in implementing the LMR policy.

To add to our frustration, it is clear that a spate of unsuitable development in Mosman will not result in additional dwellings that are affordable for average income earners. In Mosman, most of the new apartments will be marketed as luxury homes, many with iconic views. They will command prices up to \$20 million. The few allegedly 'affordable' homes incorporated into the buildings will not be at the low end of the price spectrum. They will be in a sought-after suburb and will share facilities and design features with the prestige accommodation in the same buildings. Anyone who can afford to rent the apartments would need to be earning very generous salaries. They will surely not be 'essential workers' such as paramedics, the cohort for whom the government is pushing an accelerated housing program.

Summary

My recent experience demonstrates that, unless there is adequate strategic urban planning carried out concurrently, adopting strategies like those the report recommends can lead to widespread damaging consequences. Issues can be expected to arise because:

- Directions 2.1 and 2.2 overwrite existing established norms;
- Direction 2.5 ignores some highly valued aspects of the urban environment; and
- Direction 3.3 circumvents local authorities who have traditionally acted to protect their local communities and environments.

The LMR policy is focused solely on the number of new homes built, essentially ignoring other factors that are vitally important to the community. This is the root cause of the community backlash that is leading to delays and contention.

Mosman Council has now developed a strategic plan that accommodates the full number of additional dwellings required by the NSW government but does not breach the planning controls that are of most concern to local residents. The community was consulted during the preparation of the plan, supported its adoption, and is hoping that it will be accepted quickly in order to put an end to the piecemeal destruction of our living conditions and environment.