



22nd April 2020

The General Manager
Georges River Council
McMahon Street
HURSTVILLE NSW 2220

mail@georgesriver.nsw.gov.au

**RE: Planning Proposal (PP.20190004)
Draft Instrument – Georges River LEP'2020**

Dear Madam,

Our members have requested we submit a second submission to Council on the Proposed Planning Draft Instrument, specifically in relation to the reduction of Foreshore Scenic Protection Areas (FSPA) within the previous Hurstville Council Local Government Area (LGA) Local Environment Plan (LEP) 2012. Our association is totally opposed to the proposed reduction of well of 50% of the existing FSPA in this area.

As stated in our previous submission, the harmonisation of the former Hurstville and Kogarah LGA LEPs into one document goes well beyond the bounds of harmonisation.

This reduction of the FSPA will change the face of the entire Oatley West area, parts of Mortdale Heights, Peakhurst Heights, Lugarno and Riverwood.

The objectives of the FSPA as identified in the Hurstville LEP'2012 are:

1. to recognise, protect and enhance the natural, visual, environmental and heritage qualities of the scenic areas of Hurstville and the Georges River.
2. to protect significant views to and from the Georges River.
3. to reinforce the dominance of landscape over built form.

For the Draft LEP 2020 to now say the FSPA has been reduced in accordance with the principles of '**equity and consistency**' is completely over-riding the above objectives.

When the FSPA was introduced into Hurstville Council's LEP '**equity and consistency**' were not Heads of Consideration.

Matters considered worthy at the time of establishing the FSPA was the natural environment of the area including topography, rock formations, canopy vegetation and other significant vegetation; also matters for consideration would have been the visual environment including the views to and from the Georges River, foreshore reserves, residential areas and public places; Council would have considered the whole of the FSPA as having environmental heritage significance and last but not least Council wanted to **maintain the dominance of landscape over built form.**

Our association completely objects to the drastic reduction of existing FSPA as proposed in the Draft LEP 2020 especially since a reduction of FSPA's was not even discussed in the Local Strategic Planning Statement. Residents within the Oatley West



area, parts of Mortdale Heights, Peakhurst Heights, Lugarno and Riverwood areas will not have the opportunity to attend Council workshops or hear from Council officers why certain properties have been taken out of the FSPA zones and what implications there are for the broader area from their removal.

Our members believe that to eliminate a large portion of the FSPA as depicted in the existing Hurstville LEP'2012 is environmental deprivation. The proposal will increase the density of dwellings and hard surfaces and radically change the neighbourhood character in these areas and it will also diminish the quality of bushland, wetlands and the river that are central to why people choose to live in these areas.

This narrow redrawing of the FSPA will adversely affect critical habitat, threatened species, populations of ecological communities or their habitats as biodiversity clearly will be undermined by the removal of so much of the FSPA from the fringes of the Georges River and its bays.

This proposal also threatens the water quality in the Georges River.

Some of the most significant and sensitive environmental assets of the Georges River Council LGA are the Myles Dunphy Reserve, Oatley Park and the Lime Kiln Bay wetlands and each of these reserves either fringe or drain into the Georges River.

The Hurstville LEP'2012 recognises implicitly the importance of maintaining a FSPA buffer zone around these reserves and by its removal will increase the threat of greater volumes of polluted urban run-off entering the Georges River system.

It appears that the real reason that Council is promoting the reduction of the FSPA is to increase densities by stealth:

HOUSING TARGETS OVER THE ENVIRONMENT.

Our Association strongly encourages the Council to amend this strategy and reinstate the Foreshore Scenic Protection Areas in the former Hurstville LGA to those represented in the Hurstville Council LEP'2012.

We also support the reintroduction of FSPA's into the former Kogarah Council areas, however we believe that both sides of each street that adjoins the foreshore should be included in the FSPA.

Kind Regards

Jeff Powys – President

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