

8<sup>th</sup> June 2021

Attention: Director Environment Policy  
NSW Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Online submission

To whom it may concern

**Re: draft Strategic Guide to Planning for Natural Hazards in NSW**

I write regarding *draft Strategic Guide to Planning for Natural Hazards in NSW*, (draft Guide) prepared by the Department of Planning Industry and Environment (DPIE).

The Urban Taskforce supports the draft Guide insofar as it contains “*guiding principles*” to guide the drafting of strategic plans to “*to build resilience to natural hazards in NSW*”. The Urban Taskforce accepts that in some areas of high-risk of natural hazards development opportunities can be limited - or in the extreme case – non-existent. Identifying these areas in Strategic Plans minimises impacts to new and existing communities and also provides some clarity to industry as to where investment in new development is restricted.

However, the Urban Taskforce is concerned that the draft Guide will be used by many (already) risk averse Councils as an excuse to use the risk, in many cases low, of natural hazards as an excuse to maintain the no-change sentiment favoured by some vocal constituents.

The accompanying draft Toolkit contains 41 references to help guide strategic plan-makers in considering natural hazards and risk. The guidance that is included in the Toolkit needs to allow for a balanced consideration of risk of natural hazards against the need to provide development for the purpose of new homes and jobs.

Accordingly, **Urban Taskforce recommends** the draft Toolkit be reviewed and refined to ensure all resources and references, on balance, allow for a reasonable and evidence-based consideration of risk of natural hazards against much needed new housing and jobs. Put simply, the risk of not proceeding with any given form of development must be measured against any risks associated with proceeding.

In the context of insufficient housing supply and escalating housing prices, if strategic plans are made or endorsed that further exclude or limit development on the basis of the risk of natural hazards, other land with additional development capacity will need to be identified. As such, **Urban Taskforce recommends** that DPIE, in making decisions, to exclude or limit land for new development offsets the

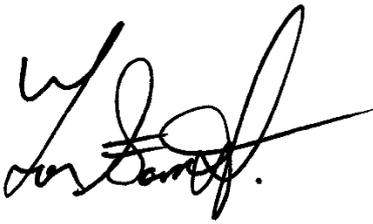
impact on supply of new housing by identifying, up-zoning and/or changing controls in other precincts with little to no risk of natural hazards.

*Table 1* contains a summary of all Urban Taskforce recommendations.

Urban Taskforce is available for additional to provide a development industry perspective on these issues.

Yours sincerely

**Tom Forrest**

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending from the end.

Chief Executive Officer

Table 1:  
**Summary of Urban Taskforce recommendations**

	<b>Urban Taskforce recommendation</b>
1.	<p><b>Urban Taskforce recommends</b> the draft Toolkit be reviewed and refined to ensure all resources and references, on balance, allow for a reasonable and evidence-based consideration of risk of natural hazards against much needed new housing and jobs. Put simply, the risk of not proceeding with any given form of development must be measured against any risks associated with proceeding.</p>
2.	<p>In the context of insufficient housing supply and escalating housing prices, if strategic plans are made or endorsed that further exclude or limit development on the basis of the risk of natural hazards, other land with additional development capacity will need to be identified. As such, <b>Urban Taskforce recommends</b> that DPIE, in making decisions, to exclude or limit land for new development offsets the impact on supply of new housing by identifying, up-zoning and/or changing controls in other precincts with little to no risk of natural hazards.</p>