

Draft South District Plan

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Turrella

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Submission content: See attached amended submission and Preliminary Heritage Report from Save Our Valley Inc. This is an update of the submission dated 6.12.2017 Save Our Valley Incorporated Committee

Number of attachments: 2

PRELIMINARY HERITAGE REPORT

GREATER SYDNEY COMMISSION DRAFT SOUTH DISTRICT PLAN AND DRAFT EASTERN CITY PLAN

SUBMITTED ON BEHALF OF SAVE OUR VALLEY- BARDWELL, EARLWOOD, TURRELLA

Save Our Valley was formed in July 2017, when many residents and business owners in Earlwood, Bardwell Park and Turrella expressed concerns about the NSW Government's plans for development in the area, specifically the Priority Precinct, which are now separate Planned Precincts for Turrella and Bardwell Park.

1. This submission is made in respect of the South District Plan because Earlwood is within the Canterbury-Bankstown Council area. Earlwood adjoins the suburbs of Bardwell Park, Bardwell Valley and Turrella, which are in the Eastern City District Plan. The Wollie Creek Regional Park is the natural feature that joins the two districts.
2. This submission is made in respect of the Eastern City District Plan because Bardwell Park and Turrella are within Bayside Council area. Bardwell Park, Bardwell Valley and Turrella adjoin the suburb of Earlwood which is in the South District Plan. The Wollie Creek Regional Park is the natural feature that joins the two districts.

This preliminary Heritage Report accompanies the general submission prepared by Save Our Valley, for the Draft South District Plan and the Draft Eastern City Plan. This submission assesses the likely impact of the strategies contained within the Draft South District Plan and the Draft Eastern City Plan, on the Aboriginal, European and natural heritage of the suburbs of Earlwood, Bardwell (Park and Valley), and Turrella. In particular, it addresses the Planned Precincts of Turrella and Bardwell Park as identified by the NSW Department of Planning and Environment, and contained within the District Plans.

DRAFT SOUTH DISTRICT PLAN AND DRAFT EASTERN CITY PLAN PRIORITIES AND ACTIONS- CONSERVATION OF ABORIGINAL, EUROPEAN AND NATURAL HERITAGE

Both the Draft South District Plan and Eastern City Plan include Priorities and Actions in relation to the conservation of Aboriginal, European and Natural Heritage. The two District Plans state:

Planning Priority S6 (South District Plan) and E6 (Eastern City Plan)- Creating and renewing great places and local centres, and respecting the District's heritage

Action 18: Conserve and enhance environmental heritage by a) engaging with the community early in the planning process to understand Aboriginal, European and natural heritage values and b) conserving and interpreting Aboriginal, European and natural heritage to foster distinctive local places.

The Draft District Plans do not include any identification of heritage items within these two Planned Precinct areas and it is understood that some form of heritage assessment will be undertaken as part of the Planned Precinct process, and potentially AFTER the District Plans are formalised.

This is in no way adequate. The suburbs of Bardwell Park, Bardwell Valley, Earlwood and Turrella are unique in that they have Aboriginal, natural and European heritage items, including groupings of Inter-War houses, aqueducts, wetlands, the Wolli Creek Valley and Aboriginal rock art and midden, together within a relatively small area. These are located in and around the Planned Precinct Areas. Heritage must be considered at the outset of any planning process proposing to rezone this area.

The following information provides an outline of the history of Bardwell Park, Bardwell Valley, Turrella and Earlwood, and the identified State and Local Heritage Items and potential Conservation Areas reflecting this history.

OUTLINE OF DEVELOPMENT: EARLWOOD, BARDWELL (PARK AND VALLEY), TURRELLA

The first Aboriginal people of the Cooks River lived tens of thousands of years ago in a time of cooler temperatures and lower sea levels. Botany Bay did not yet exist, but was instead a huge dune field. The river flowed south through what is now Kurnell and out to sea. Near the current site of Tempe House (Wolli Creek), traces of a fire and some stone tools from around 10,000 years ago suggest that Aboriginal people lived in this environment. Many artefacts such as stone tools can be found from later occupation of this area, along the Cooks River and within rock shelters above the waterways, as groups adapted to ongoing climate and environmental change.

The European development of the Canterbury Municipality (including the suburb of Earlwood), depended on road transport, and settlement was facilitated by the extension of the tramway from Hurlstone Park to Canterbury in 1921 and from Undercliffe to Earlwood in 1924. Canterbury's period of greatest growth occurred in the late 1920's with a surge of building of brick cottages and bungalows. The War Services Homes Commission was very active in the Canterbury Municipality acquiring land previously occupied by sawmills, timber yards, brick pits and tile works. Much of the suburb of Earlwood retains housing from the Federation and Inter-War period and it remains predominantly low-density, with some residential flat development limited to the ridge line of Homer Street facing Marrickville, and above existing shopfronts along Homer Street.

Bardwell Park was named after the free settler Thomas Hill Bardwell who owned land in the area. His grant was originally heavily timbered and bounded by Wolli Creek, Dowling Street and Wollongong Road. In 1881 the land was auctioned and 1600 acres was subdivided. The railway station opened on 21 September 1931 which opened up the area for home sites. Much of the suburb of Bardwell Park retains housing from the early stage of development in the 1930's, through to the 1960's.

In the nearby area which was to become Turrella, 1842 William Favell and his wife Eleanor farmed a property named Hillside. Their neighbours were the families of Thomas Curtis and Henry Blackwell, who were orchardists and gardeners. These farms and orchards were subdivided when the railway came through. The Turrella Railway Station also opened along with Bardwell Park Station on 21 September 1931. The light industrial buildings were built close to the railway line and one of the biggest factories in the area was the Streets Ice-Cream factory, which has since closed. Much of the suburb of Turrella retains housing from the early stage of development through to the 1960's. One industrial area remains, which is on the Canterbury-Bankstown Council side of the train line at Turrella.

The Environmental Heritage of Bardwell Park and Valley, Earlwood and Turrella is listed on the State Heritage Register, the Local Environmental Plans of Rockdale and Canterbury and by the National Trust of Australia. Aboriginal sites are also listed by the NSW National Parks and Wildlife Service.

HERITAGE LISTING: STATE HERITAGE REGISTER

The Earlwood Aboriginal Art Site is listed as a State Heritage Item on the NSW State Heritage Register. The exact location is not made available for the public on the Register. The Aboriginal Art Site at Earlwood comprises a midden in a rock shelter with stencils of hands and feet on the rock walls of the shelter. There are 23 white hand stencils, two of which also depict forearms. Also included are two white foot stencils, a rare occurrence in the Sydney area and throughout Australia. The midden is largely undisturbed although the soil and rubbish lie on top of the midden.

The Statement of Significance says that the Aboriginal art site at Earlwood is of State Heritage Significance as it provides clear and intact evidence of Aboriginal occupation of the area prior to European settlement. Comprising a rock shelter, midden and stencil work, the site offers a rare and unique insight into the daily life as well as the routine and ceremonial culture of the Bidjigal people prior to European contact. Its significance is strengthened in that it is a rare example of such an intact surviving occupation site in a highly urbanised setting.

The Aboriginal art and midden site at Earlwood is of State Significance as both a rare and representative example of painted stencil art including foot stencils, from the Sydney basin, providing a basis for cross comparison with other regional styles across NSW.

The site is exceptionally rare within the local area, being the only one of its kind in the City of Canterbury, and is also rare within the Central Sydney Region and the State, both for its combination of art and midden deposit, and especially for the presence of rare foot stencils.

The site is historically and culturally associated with the Bidjigal Aboriginal People.

The site has a high potential to reveal archaeological data and thus increase the understanding of the site and similar sites and their integration into traditional Aboriginal life and culture.

There is also an Aboriginal Heritage Study for the Wolli Creek Regional Park which must be reviewed to identify additional potential Aboriginal Sites within and around the Park and which may be impacted by development adjoining the Park as part of the Planned Precincts.

HERITAGE STUDIES AND HERITAGE LISTING: CANTERBURY LOCAL ENVIRONMENTAL PLAN 2012 SCHEDULE 5 (ENVIRONMENTAL HERITAGE) AND ROCKDALE LOCAL ENVIRONMENTAL PLAN 2011 SCHEDULE 5 (ENVIRONMENTAL HERITAGE)

In 1995 Canterbury Council, with funding from the NSW Department of Planning, engaged the National Trust of Australia to undertake a study of Inter-war housing in Earlwood with the aim of making recommendations regarding potential Conservation Areas. The Study identified seven important areas across the suburb and proposed that these be incorporated into seven Conservation Areas. Against the recommendations of the National Trust, the Council chose to individually list heritage items rather than create Conservation Areas within Earlwood, and to create one Conservation Area in Ashbury. However, Canterbury Council also chose to retain the low-density character of the suburb of Earlwood, and its consistency of streetscape and period of development, by creating a low-density zone for its residential areas, with higher density zoning in the form of mixed-use development/shop top housing in the main shopping precinct at Earlwood.

The Canterbury Local Environmental Plan 2012 Schedule 5 (Environmental Heritage) contains 23 individual Heritage Items located in the suburb of Earlwood. These 23 items include groupings of Inter-War housing, groupings of Federation housing, Inter-War street trees, Girrahween Park gates, two Victorian Sewage aqueducts- Cooks River Aqueduct and the Wolli Creek Aqueduct, one Federation sandstone shop and attached house and two Inter-War shops with dwelling above.

Rockdale Council has a Heritage Study which has formed the basis of the heritage listing within its Local Environmental Plan 2011. The Council did not identify any Conservation Areas due to the long history of development in the area, which is reflected in the mixture of dwelling types ranging from Victorian to modern contemporary. The Council, however, did ensure that local suburbs with consistent character such as Bardwell Park and Turrella, retained a low-density zoning and that high density development was to be located in more appropriate areas such as along Highways and at major town centres such as Rockdale Town Centre.

The Rockdale Local Environmental Plan 2011 Schedule 5 (Environmental Heritage) contains 1 item in Bardwell Park (Hillsdon's Nursery Cottage), 10 items in Bardwell Valley (including cottages and a quarry and rock face), 4 items in Turrella (a church, a school, a cottage and the Wolli Creek Wetlands), and also the Wolli Creek Valley.

NATIONAL TRUST OF AUSTRALIA'S INTER-WAR HOUSING STUDY 1995 : POTENTIAL CONSERVATION AREAS IN EARLWOOD

As indicated, the National Trust of Australia's Inter-war Housing Study identified seven significant areas across the suburb of Earlwood, and proposed that these be incorporated into seven Conservation Areas. Five of these proposed Conservation Areas are relevant to this submission as they are located within or adjacent to, the overall boundary of the Planned Precinct Areas for Bardwell Park and Turrella.

The five areas are:

- Precinct 6: Undercliffe
- Precinct 7: Earlwood North
- Precinct 8: Earlwood
- Precinct 9: River Street, Earlwood
- Precinct 10: Clemton Park

The five areas are shown in the map attached (Appendix 1).

1. Precinct 6: Undercliffe.

Description: The Undercliffe Precinct is located on the top of the ridge with panoramic views over Marrickville and Rockdale. Housing in the area consists predominantly of large 1920's Californian Bungalows and was developed in the same period giving a consistency of streetscape. Gardens are extensively landscaped and well-maintained.

Statement of significance: The area possesses streetscape integrity due to the development taking place in one period, and the excellent state of preservation of the houses and gardens. The area has a

uniformity of housing style including colour, form and architectural detail that gives the area an harmonious appearance. The predominance of the Californian Bungalow type illustrates the important influence of American housing ideals and styles on Australia as an important adjunct to the previous English and Indian-derived bungalows. It reflects the availability of finance enabling the middle class to borrow money and finance the purchase of a house and epitomises the great diversion of funds in Australia from private investment in industry and infrastructure to “non-productive” investment in private housing. By virtue of the importance of home ownership in Australia, the area embodies the success in successive Australian government’s political control and subjection of the electorate.

2. Precinct 7: Earlwood North. * Sheet missing- to be included at a later date.

3. Precinct 8: Earlwood.

Description: The Earlwood Precinct is located on the top of the Earlwood knoll with panoramic views over Bardwell Park. The Precinct includes the commercial centre which was largely constructed in the 1920’s and 1930’s (such as the Earlwood Hotel and Our Lady of Lourdes Church). Housing in the area consists predominantly of large 1920’s Californian Bungalows and was developed in the same period giving a consistency of streetscape. Gardens are extensively landscaped and well maintained.

Statement of significance: The area possesses streetscape integrity due to the development taking place in one period, and the excellent state of preservation of the houses and gardens. The area has a uniformity of housing style including colour, form and architectural detail that gives the area an harmonious appearance. The predominance of the Californian Bungalow type illustrates the important influence of American housing ideals and styles on Australia as an important adjunct to the previous English and Indian-derived bungalows. It reflects the availability of finance enabling the middle class to borrow money and finance the purchase of a house and epitomises the great diversion of funds in Australia from private investment in industry and infrastructure to “non-productive” investment in private housing. By virtue of the importance of home ownership in Australia, the area embodies the success in successive Australian government’s political control and subjection of the electorate.

4. Precinct 9: River Street, Earlwood.

Description: The River Street Precinct is a nineteenth century subdivision pattern consisting of extremely small allotments and narrow streets.

Statement of Significance: The area possesses streetscape integrity due to the development during one period and the excellent state of preservation of the houses and gardens. The area has a

uniformity of housing style including colour, form and architectural detail that gives the area an harmonious appearance. The subdivision illustrates the mean-ness of nineteenth century developers seeking to maximise profits and the later concerns of the effect of environment on the social fabric which resulted in government housing schemes and larger lots under the influence of the Garden City Movement.

5. Precinct 10: Clemton Park.

Description: The Clemton Park Precinct is located on the west and south sloping sides of the Earlwood knoll. Housing in the areas consists predominantly of 1920's Californian Bungalows in the southern half and 1930's bungalows around Homer Street and north of Homer Street. There are brush box street trees in the southern half (eg Wolli Avenue) and Eucalypts in some of the streets north of Homer Street.

Statement of Significance: The area possesses streetscape integrity due to the development taking place in one period in its two major parts and the excellent state of preservation of the houses and gardens. The area has a uniformity of housing style including colour, form and architectural detail that gives the area an harmonious appearance. The predominance of the Californian Bungalow type in the southern half illustrates the important influence of American housing ideals and styles on Australia as an important adjunct to the previous English and Indian-derived bungalows and the 1930's houses in the northern half illustrate the important influences of Tudor Revival and Colonial Revival. It reflects the availability of finance enabling the middle class to borrow money and finance the purchase of a house and epitomises the great diversion of funds in Australia from private investment in industry and infrastructure to "non-productive" investment in private housing. By virtue of the importance of home ownership in Australia, the area embodies the success in successive Australian government's political control and subjection of the electorate.

POTENTIAL IMPACT ON ON EXISTING ENVIRONMENTAL HERITAGE AND URBAN CHARACTER AREAS

The Planned Precincts of Bardwell Park and Turrella which aim to rezone land within 800m of train stations to fast-track high density residential development, will have a critical impact on the identified cultural heritage of these suburbs. Whilst the NSW Department of Planning and Environment has suggested a reduction in the area to be the focus of higher density rezoning (identified as blue on maps provided to residents by the DPE), this is at the concept stage and only a general boundary has been included in the Draft District Plans as prepared by the Greater Sydney Commission, which raises concern that the blue area can be expanded at any time.

As one of the main priorities of the Greater Sydney Commission is *to conserve and enhance environmental heritage and to foster distinctive local places* it is critical that the existing heritage items and urban character areas be protected from forced change.

The Earlwood Aboriginal Art Site and midden (exact location not identified) and other potential Aboriginal Sites within the Wollie Creek Regional Park are possibly located within the radius of the Planned Precincts and therefore Aboriginal heritage may be threatened by this proposal.

The Wollie Creek Wetlands and the Wollie Creek Valley are irreplaceable heritage items in the Rockdale LEP 2011. They are highly valued and are significant within the City of Sydney. The Planned Precincts surround these Items of Environmental Heritage and have a potential profound impact on these items.

The suburb of Earlwood is characterised by its areas of intact and consistent streetscapes and landscaping/gardens, which demonstrate particular periods of development of this suburb. The National Trust of Australia clearly states why this is the case in its report (funded by the NSW Department of Planning) and recommended that a number of Conservation Areas be created to protect this character. Since 1995 there has been little to alter the consistency of the streetscapes of Earlwood and those recommendations still apply. The National Trust's proposed Conservation Areas must be re-assessed for possible inclusion in the Canterbury LEP.

The three suburbs of Earlwood, Bardwell Park and Turrella have many items of European heritage which also are potentially impacted by the proposed Planned Precincts at Bardwell Park and Turrella.

RECOMMENDATIONS

It is recommended that the Planned Precincts of Bardwell Park and Turrella be excised from the Greater Sydney Commission's Draft District Plans South and City East, on heritage grounds until further heritage investigation takes place which clearly identifies the impacts on existing cultural heritage and the best means to protect and enhance this heritage.

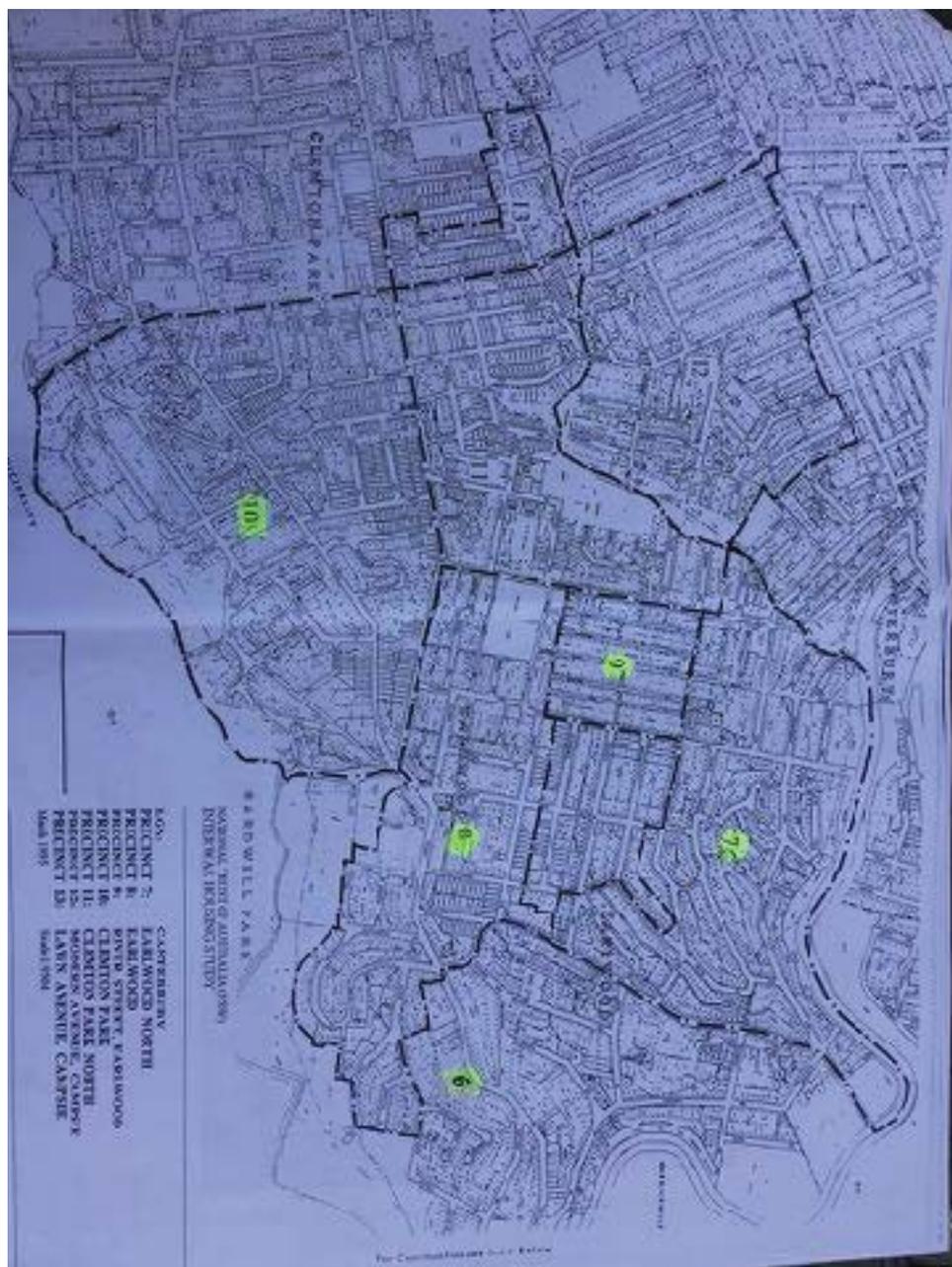
In particular, any plans for this area must ensure the protection of the State Heritage listed Earlwood Aboriginal Art Site and Midden. The Aboriginal Heritage Study must be reviewed and any potential additional Aboriginal sites within the boundaries of the proposed Planned Precincts, be identified and appropriate recommendations for their protection be made.

Any plan for this area must ensure the protection of all Items of Environmental Heritage, including the Wollie Creek Wetlands, the Wollie Creek Valley, houses, trees, quarries, churches, gates and aqueducts which reflect the history, community and ongoing development of these suburbs.

It is recommended that Canterbury-Bankstown Council undertake a Heritage Review based upon the 1995 National Trust assessment prepared for Canterbury Council, with a view to listing five Conservation Areas across Earlwood.

It is recommended that rezoning for higher density be limited *at this time*, to the existing areas and controls contained within the Canterbury Local Environmental Plan 2012, which currently allow higher density where appropriate, as shop-top housing in the main shopping strip of Earlwood, and the Rockdale Local Environmental Plan 2011, which identifies key locations such as Rockdale Town Centre.

APPENDIX 1: MAP SHOWING NATIONAL TRUST OF AUSTRALIA'S CANTERBURY INTER-WAR HOUSING STUDY 1995





Save Our Valley Incorporated Bardwell Earlwood Turrella

Submission to Greater Sydney Commission - District Plans – amended 12.12.2017

1. South District Plan - Earlwood is in the Canterbury-Bankstown Council area
2. Eastern City District Plan - Bardwell Park and Turrella are in Bayside Council area

Save Our Valley is incorporated with the Department of Fair Trading as a non-profit community group, made up of local volunteers. We are not affiliated with any political organisation or party.

As a volunteer organisation we have not had time or resources to examine the District Plans thoroughly. We submit that more time should be given for community consultation before any of the plans are implemented.

We would welcome the opportunity to discuss the District Plans with officers of the Greater Sydney Commission. We invite the Commission to meet with our members as part of the consultation process.

Save Our Valley was formed in July 2017, when many residents and business owners in Earlwood, Bardwell Park and Turrella expressed concerns about the NSW Government's plans for development in the area, specifically the Priority Precinct, which are now separate Planning Precincts for Turrella and Bardwell Park.

1. This submission is made in respect of the South District Plan because Earlwood is within the Canterbury-Bankstown Council area. Earlwood adjoins the suburbs of Bardwell Park, Bardwell Valley and Turrella, which are in the Eastern City District Plan. The Wolli Creek Regional Park is the natural feature that joins the two districts.
2. This submission is made in respect of the Eastern City District Plan because Bardwell Park and Turrella are within Bayside Council area. Bardwell Park, Bardwell Valley and Turrella adjoin the suburb of Earlwood which is in the South District Plan. The Wolli Creek Regional Park is the natural feature that joins the two districts.

This amended submission addresses the issue of flooding and includes as a separate annexure document a Preliminary Heritage Report that addresses specific heritage factors for these suburbs relevant to the District Plans. The Heritage Report makes clear that the suburbs should be taken out of the District Plans, Planned Precincts and other development proposals until a more detailed studies of the heritage components of the areas (eg Aboriginal sites, inter-war housing, ecological sites) is undertaken.

We are not against development. We are for integrated planning and development in consultation with the local community to ensure that the housing density levels are appropriate for our suburbs in a way

that respects the needs of the community and its urban character. We are for development only where it includes additional public transport, good traffic planning, new schools, open spaces, and community facilities in proportion to any projected increase in population.

Save Our Valley's aims are to:

- alert the local community to the State Government's development plans for the suburbs of Bardwell Park, Bardwell Valley, Earlwood and Turrella.
- address issues arising from the Priority Precinct proposals and potential re-zonings in those suburbs
- act as a channel for the community to express its concerns about the proposals
- advocate for outcomes that respect the rights and values of local residents and business owners and are compatible with the local topography, amenity and heritage.

Our objectives are:

1. Consultation with community – consultation is conducted at all stages of the planning process with existing residents, community groups, and local businesses and is not limited to 'information sessions'.
2. Appropriate planning - approvals for residential, commercial and industrial developments reflect the existing character of Earlwood, Turrella, Bardwell Park and Bardwell Valley; and avoid overshadowing and limit building heights to 13 metres from ground level.
3. Planning for entire suburbs - planning for infrastructure, transport, residential scale and community amenity is on a whole-of-suburb basis, not site-by-site as DAs are submitted.
4. Mandated community infrastructure - locations and scale of community facilities, schools and open space are identified and mandated in advance of any rezoning for residential development in proportion to the projected increase in population.
5. Mandated open space and amenity - publicly accessible open space is increased by excluding i
6. Air quality – any development includes monitoring air quality at the pollution stacks resulting from the increased traffic on duplicated M5.
7. Jobs and businesses – job numbers created post-construction in priority precinct areas exceed job numbers lost from the rezoning of the Turrella industrial area; and the prosperity of the existing local small businesses is facilitated by good quality, integrated planning.

Specifically we have concerns about the following aspects of the draft District Plans:

1. It is commendable that the Greater Sydney Commission has prepared detailed regional strategies for the future for our Districts. However a main focus of the District Plans is to justify key areas for density increases, which are targeted for "urban renewal". Our suburbs were selected "for renewal" by the Department of Planning and Environment with no input by Council or residents of those suburbs. The Plans are focussed on the components of a place (e.g. housing, infrastructure, natural areas) rather than the communities that make up those places. The outcomes are already set and it appears that there is little opportunity for the community to alter or change those plans.
2. The District Plans and Planned Precinct Program conflict with the zoning and strategic planning by the former Canterbury and Rockdale Councils, in which areas suitable for high rise (e.g. Rockdale Train Station, Campsie Train Station) were identified but the urban character of low-density areas was maintained through low-density zoning. Canterbury-Bankstown Council is not supportive of the way the Department of Planning and Environment has identified suburbs for "renewal" and has recently voted to place an embargo on rezoning in certain suburbs until more detailed investigation takes place and planning for infrastructure is undertaken.
3. Many of the objectives of the District Plans conflict with the proposed "renewal" (upzoning) of Bardwell Park, Turrella and Earlwood, e.g. maintaining urban character and heritage; maintaining industrial areas; enhancing waterways and protecting; and enhancing critical urban bushland and green corridors.

4. Despite clearly-expressed community concerns, there is no detail as to how infrastructure will be provided to match density increases. The District Plans provide an image of what the City will look like but no plan for how to get there.

General Comments on the South District Plan

The housing plans proposed in the South District Plan are unfair and inequitable. When the draft District Plan housing projections for Canterbury City Council (South District) and Bayside Council (Eastern City District) areas are combined, that is a housing target of 23,400 in the next 5 years. This is a huge increase in population and is grossly disproportionate to other suburbs/areas within the two Districts and disproportionately high compared to the whole of Sydney. We consider that the allocation of extra densities as proposed by the Department of Planning and Environment and reinforced by the South District Plan, are inequitable and do not recognise the existing and desired future character of our area.

The suburbs of Earlwood, Bardwell Park and Turrella are connected by the Wolli Creek Valley and Regional Park and the proposed urban renewal areas in the District Plans will have a negative impact on the entire area, and particularly on its wildlife, the green canopy, waterways and open space. The proposed increases in density will impact on existing infrastructure, will worsen road congestion and public transport congestion and reduce the liveability of our suburbs.

Cultural Diversity

Comments: The three suburbs of Bardwell Park, Earlwood and Turrella are culturally diverse suburbs with thriving local networks. It is great that the District Plans include the need to understand and support cultural diversity. The District Plans contain many general statements with almost no real strategies to support our suburbs. Often the way a suburb is used is not well understood by those who have never been to the suburb. It is suggested that Local Government is better placed to understand, enhance and respond to the needs of diverse communities.

Healthy Communities

Comments: The emphasis on healthy and active lifestyles within the District Plan is supported. The concepts of strong social networks, physical activity and access to fresh food are critical to ensuring a healthy future for the residents of Sydney. Replacing existing housing (and residents) with higher density development (and new residents) undermines existing social networks and it is arguable that high-rise development is less healthy than lower and medium-density housing.

Inadequate planning for flood events

Comments: The District Plans do not consider flooding and water inundation events in the suburbs of Earlwood, Bardwell Park and Turrella any detailed manner, even though these suburbs lay within the Sydney waterways ecosystems, including Wolli Creek and the Cooks River. Significant flooding events occur regularly along Wolli Creek adjacent to the railway lines at Turrella, Bardwell Park (with Earlwood to the north) and Bexley North stations, with the height of the waterways rising rapidly. This affects traffic, public transport and pedestrian access to these suburbs, especially at the crucial bridge points which cross Wolli Creek north to south.

Any increase in multi-unit residential areas and loss of green space due to loss of houses with green space will significantly increase flooding in these Planned Precinct areas. Multi-unit residential complexes, whether medium density or high rise, have less garden space and grassed areas that can absorb rain and water in heavy rain events and extreme weather events compare to single dwelling or low density housing. This means that more stormwater will flow into the Cooks River and Wolli Creek systems from the medium-high density areas. Already Bayside Council is doing major stormwater pipe increases in the council areas because their modelling and projections anticipate huge stormwater increases for the waterways systems in these their local council areas as a result of increased density and consequent loss of green spaces.

If flooding in these areas increases as a result of State government and local council allowing inadequate design and infrastructure, poor planning and modelling and not taking into account the likely increased incidents of floods, inundation and deluge, residents, businesses and developers will take action for redress and compensation.

P. 8 South District Structure Plan 2036

Comment: The map omits Wolli Creek Regional Park, which should be shaded green as “protected natural area”.

P. 11 Greater Sydney Context

Plan Summary: People want to live close to jobs and services....more housing in the right places which will assist with housing affordability.

Comment: Merely increasing supply of high-rise housing does not necessarily improve affordability or housing choice. Affordability requires a more complex approach including planning for social and community housing, targeted affordable housing through new development and local government involvement. There is only one type of housing emphasised (high-rise) but no increase in medium density housing in the District Plan although the South District will see a growth in families with young children and those over 65.

Improved transport within and between each of the three cities will produce a 30 minute city.

Comment: The arrangement of the City of Sydney into three parts is arbitrary. The CBD still dominates as the main employer of people and many workers do not wish to be restricted to working in local areas. The District Plan also reinforces a move to private transport such as the Metro and WestConnex toll road but there is no proposal to improve existing bus or public rail services. The Plan groups taxis and Uber into public transport infrastructure which it is not. Without improvements in public transport it is hard to see how this will become a “30 minute City”.

P. 20 Planning Priority S2- Working through collaboration

Action 7: Identify, prioritise and deliver Collaboration Areas

Comment: Our suburbs were selected “for renewal” by the Department of Planning and Environment with no input by Council or residents of those suburbs. With the District Plans, the community continues to be given neither opportunity to substantially alter these housing densities nor any justification as to why they need to be “renewed”. Canterbury-Bankstown Council is not supportive of the way the Department of Planning and Environment has identified suburbs for “renewal” and has recently voted to place an embargo on rezoning in certain suburbs until more detailed investigation takes place and planning for infrastructure is undertaken.

Bayside Council also does not appear to support the key strategies contained in the District Plans.

Bardwell Park...in collaboration with Georges River Council

Comment: Bardwell Park is within the Bayside Council area and adjoins Canterbury-Bankstown Council area.

P.21 Table 1: Urban Transformation

Focus: Focus on optimisation of government-owned land and urban renewal

Comment: The continued sell-off of Crown Land for development purposes is not supported.

P.24 Planning Priority S3- Providing services and social infrastructure to meet people’s changing needs

Action 8: Deliver social infrastructure to reflect the needs of the community now and in the future

Comment: With significant increases in densities it is critical that social infrastructure is planned at the outset to meet expected demand. The District Plans propose increases in families with primary-aged children and also those over 65. There is no clear outline of social infrastructure provision in the District Plans and the burden is shifted to local councils and community providers. There are more “strategies” such as a “NSW Ageing Strategy 2016-2022” and the “Schools Assets Strategic Plan” which do not give assurances that we will be able to respond to changing demands that are proposed in these District Plans. The District Plans suggest increased shared use of existing facilities and sell-off or use of publicly owned land.

P 36 Planning Priority S5- Providing housing supply, choice and affordability, with access to jobs and services

More Housing in the right locations

Objective 10: Greater housing supply, and Objective 11: Housing is more diverse and affordable
Other matters to be carefully considered include: • the feasibility of development, including financial viability across a range of housing configurations (one, two, three or more bedrooms) and consistency with market demand • heritage and cultural elements, visual impacts, natural hazards such as flooding, special land uses and other environmental constraints • local features such as topography, lot sizes, strata ownership and the transition between different built forms • the staging of enabling infrastructure, upgrades or expansions of social infrastructure such as local schools, open space including sport and community facilities.

Comment: The topography of Earlwood is significant. The suburb is built on sandstone escarpment which means that access to sites is difficult and streets are narrow with little room to expand. This means that traffic congestion will significantly increase with any substantial increase in population either in Earlwood and/or in Bardwell Park and Turrella because the suburbs share roadways and public transport facilities.

P 38 Planning Priority S5- Providing housing supply, choice and affordability, with access to jobs and services

Housing strategies and targets

Table 2 sets five-year housing targets for the South District which are the same as published in the November 2016 draft District Plan. These are based on the District's dwelling needs and the existing opportunities to deliver supply. They include all types of housing – traditional detached and attached houses, apartments, seniors housing, granny flats and aged care. The five-year targets are generally consistent with known housing approvals and construction activity. These are minimum targets and largely reflect delivery potential under current planning controls.

Comment: In the next 5 years Canterbury Bankstown Council is scheduled to take on 13,250 dwellings of a total estimate of 23,250 for the entire district - as a minimum. This is a totally unfair distribution. The debacle of shoddy and non-compliant development along Canterbury Road and Canterbury and Campsie is evidence that developers and councils cannot be trusted to deliver the kind of housing that the Greater Sydney Plan envisages. Meaningful and sustained community engagement prior to any development proposal going to council or the Department of Planning is essential to ensure we do not make the same mistakes.

P. 40 Planning Priority S6- Creating and renewing great places and local centres, and respecting the District's heritage.

Action 18: Conserve and enhance environmental heritage by a) engaging with the community early in the planning process to understand Aboriginal, European and natural heritage values and b) conserving and interpreting Aboriginal, European and natural heritage to foster distinctive local places.

Comment: Environmental heritage will be the subject of a separate submission which argues that the Urban Renewal Areas of Bardwell Park, Earlwood and Turrella conflict with the history and urban character of these suburbs. The submission will look at the National Trust environmental heritage study for the former Canterbury Council which recommended a number of conservation areas through Earlwood. If maintaining heritage is a critical objective of the District Plans, then the existing low-density streets which had been identified as potential conservation areas should be maintained and high-density development located elsewhere.

P. 46 Productivity

Action 38: Manage industrial land in the South District by protecting all industrial zoned land from conversion to residential development, including conversion to mixed-use zones

Comment: The proposed Urban Renewal areas include industrial land at Turrella which is proposed for high-rise development. This conflicts with the objectives contained in the District Plan and it is therefore recommended that the industrial uses remain at Turrella.

P.82 Planning Priority S13- Protecting and improving the health and enjoyment of the District's waterways.

Action 57: Protect environmentally sensitive coastal areas and waterways, and Action 59: Improve the health of catchments and waterways through a risk-based approach to manage the cumulative impact of development

Comment: Whilst the District Plan includes protecting waterways as a main objective, it also proposes to build high-density residential development on land surrounding Wolli Creek (e.g.

Turrella). This will have adverse impacts on the health of the Creek, its wildlife, flora and on flooding. It is suggested again that the proposal to rezone the existing low scale industrial areas at Turrella to high-rise is conflicting with these objectives.

P. 86 Planning Priority S14- Protecting and enhancing bushland, biodiversity and scenic and cultural landscapes and better managing rural areas

Action 61: Protect and enhance biodiversity by a) supporting landscape-scale biodiversity conservation and the restoration of bushland corridors and b) managing urban bushland and remnant vegetation as green infrastructure

Comment: The South District Plan includes a project for Wollie Creek Regional Park and Bardwell Valley Parkland to provide connected areas of ecologically significant vegetation and improved water quality and stormwater management. This proposal conflicts with the Urban Renewal Areas of Turrella, Bardwell Park and Earlwood which surround and back onto Wollie Creek Regional Park and the Bardwell Valley Parklands. Introducing high rise development will impact on existing wildlife, the quality of the Regional Park and the Valley and is therefore not supported.

Comment: Wollie Creek Regional Park and is the main dividing point between the South District and Eastern City District, so the plans for one district will impact on the other. The Eastern City District Plan contains an important aim of protecting Wollie Creek Regional Park and Bardwell Valley Parklands as critical remnant bushland and waterway. It states that this is an area of ecologically significant vegetation and is a “priority green grid project for both the South and Eastern City Districts”. However, both District Plans show Priority Precincts (now ‘Planned Precincts’) slated for high-rise, surrounding this critical area. As the Wollie Creek Regional Park adjoins the Priority Precincts of Earlwood, Bardwell Park and Turrella we are greatly concerned about the impact of development on this precious piece of bushland and the native fauna and other wildlife that inhabit the bushland. Save Our Valley Incorporated is concerned that even if the actual housing developments do not encroach on the actual Regional Park area, the development - including light pollution from high rise buildings along the rail corridor - will impact negatively on the health of Wollie Creek bushland, for example, the flying fox colonies that use this ‘green highway’ to navigate from the city to their feeding grounds.

General Comments on the Eastern City Plan

In the next 5 years Bayside Council is scheduled to take on 10,150 dwellings of a total estimate of 46,550 for the entire district - as a minimum. It is second only to City of Sydney Council. This is a totally unfair and inequitable distribution. The debacle of shoddy and non-compliant development along Canterbury Road and Canterbury and Campsie is evidence that developers and councils cannot be trusted to deliver the kind of housing that the Greater Sydney Plan envisages. Meaningful and sustained community engagement prior to any development proposal going to council or the Department of Planning is essential to ensure we do not make the same mistakes.

The suburbs of Bardwell Park and Turrella are connected by the Wollie Creek Valley and Regional Park and the proposed urban renewal areas in the District Plans will have a negative impact on the entire area, and particularly on its wildlife, the green canopy, waterways and open space. The proposed increases in density will impact on existing infrastructure, will worsen road congestion and public transport congestion and reduce the liveability of our suburbs.

Cultural Diversity

Comments: The three suburbs of Bardwell Park, Earlwood and Turrella are culturally diverse suburbs with thriving local networks. It is great that the District Plans include the need to understand and support cultural diversity. The District Plans contain many general statements with almost no real strategies to support our suburbs. Often the way a suburb is used is not well understood by those who have never been to the suburb. It is suggested that Local Government is better placed to understand, enhance and respond to the needs of diverse communities.

Healthy Communities

Comments: The emphasis on healthy and active lifestyles within the District Plan is supported. The concepts of strong social networks, physical activity and access to fresh food are critical to ensuring a healthy future for the residents of Sydney. Replacing existing housing (and residents) with higher

density development (and new residents) undermines existing social networks and it is arguable that high-rise development is less healthy than lower and medium-density housing.

Inadequate planning for flood events

Comments: The District Plans do not consider flooding and water inundation events in the suburbs of Earlwood, Bardwell Park and Turrella any detailed manner, even though these suburbs lay within the Sydney waterways ecosystems, including Wolli Creek and the Cooks River. Significant flooding events occur regularly along Wolli Creek adjacent to the railway lines at Turrella, Bardwell Park (with Earwood to the north) and Bexley North stations, with the height of the waterways rising rapidly. This affects traffic, public transport and pedestrian access to these suburbs, especially at the crucial bridge points which cross Wolli Creek north to south.

Any increase in multi-unit residential areas and loss of green space due to loss of houses with green space will significantly increase flooding in these Planned Precinct areas. Multi-unit residential complexes, whether medium density or high rise, have less garden space and grassed areas that can absorb rain and water in heavy rain events and extreme weather events compare to single dwelling or low density housing. This means that more stormwater will flow into the Cooks River and Wolli Creek systems from the medium-high density areas. Already Bayside Council is doing major stormwater pipe increases in the council areas because their modelling and projections anticipate huge stormwater increases for the waterways systems in these their local council areas as a result of increased density and consequent loss of green spaces.

If flooding in these areas increases as a result of State government and local council allowing inadequate design and infrastructure, poor planning and modelling and not taking into account the likely increased incidents of floods, inundation and deluge, residents, businesses and developers will take action for redress and compensation.

P. 8 Eastern City District Structure Plan 2036

Comment: Omits Wolli Creek Regional Park, which should be shaded green as a “protected natural area”. It also shows a connected corridor of urban development stretching from Turrella and Bardwell Park to Brighton-Le-Sands, however this corridor and how this is to be developed, is not discussed in the Eastern City Plan.

P. 20 Planning Priority E2- Working through collaboration

Objective 5: Benefits of growth realised by collaboration of governments, community and business

Comment: Our suburbs were selected “for renewal” by the Department of Planning and Environment with no input by Council or residents of those suburbs. With the District Plans, the community continues to be given no opportunity to substantially alter these housing densities and no justification as to why they need to be “renewed”. Canterbury-Bankstown Council is not supportive of the way the Department of Planning and Environment has identified suburbs for “renewal” and has recently voted to place an embargo on rezoning in certain suburbs until more detailed investigation takes place and planning for infrastructure is undertaken. Bayside Council in the Eastern City District also does not appear to support the key strategies contained in the District Plans.

P.24 Liveability

Liveability is about people’s quality of life....provision of a range of housing types in the right locations with measures to include affordability. This enables people to stay in their neighbourhoods and communities as they transition through life.

Comments: The proposed Urban Renewal Areas of Turrella and Bardwell Park involve ‘upzoning’ existing low-density residential housing to develop high-rise housing. This essentially moves residents from their suburb and prevents them from remaining in their neighbourhoods and communities. The corridor of redevelopment from Turrella/Bardwell Park to Brighton-Le-Sands will create a significant dislocation of existing residents, many of whom are elderly. It fractures existing communities.

P. 28 Planning Priority E3- Providing services and social infrastructure to meet people’s changing needs

Older People: More compact housing types and medium-density housing, as well as the design of walkable neighbourhoods, will create opportunities for older people to continue living in their community, where being close to family, friends and established health and support networks improves people’s wellbeing.

Comments: The proposed Urban Renewal Areas of Turrella and Bardwell Park involve 'upzoning' existing low-density residential housing to develop high-rise housing. This essentially moves some residents from their suburb and prevents them from remaining in their neighbourhoods and communities. The District Plan states that development in Urban Renewal Areas will be high-rise but that local government will be left to provide medium-density housing, but that medium-density housing is better for older residents. It also later states that high-rise can provide housing for seniors. There are mixed messages in this District Plan.

P. 38 Planning Priority E5- Providing housing supply, choice and affordability with access to jobs and services

Historic Housing supply: Large-scale urban renewal precincts are increasing both the numbers and proportion of high-density dwellings.

Comments: This conflicts with P. 36 which states that "apartments can provide important housing for seniors and more affordable houses for young people....This needs to be balanced with medium density row, terrace and villa homes that provide diversity". The District Plan works against its own objectives as it is forcing one type of housing (high-rise) and is reducing diversity (medium and low density housing).

Current initiatives and opportunities: The Priority Precincts (Turrella, Bardwell Park) will be consistent with the objectives and strategies of the Greater Sydney Region Plan...planning will be supported by a Special Infrastructure Contribution or similar satisfactory arrangement to help fund the delivery of essential community infrastructure such as health, schools, open space and roads.

Comments: No details are provided as to how critical infrastructure will meet increased housing provision.

Local Government strategies that identify opportunities to increase capacity for housing in the Eastern City District include Rockdale Council's Residential Strategy (2007), Rockdale Urban Centres Strategy (2010) and Rockdale Town Centres Masterplan (2012).

Comments: The now Bayside Council retained a low density zone for Turrella and Bardwell Park in recognition of its existing urban character and because of site constraints such as topography and location around a waterway and Regional Park. The decision to rezone residential land at Turrella and Bardwell Park was solely made by the Department of Planning and Environment and goes against the zoning of the Council.

P. 92 Planning Priority E14- Protecting and improving the health and enjoyment of the District's waterways

Action Item 59: Improve the health of catchments and waterways through a risk-based approach to managing the cumulative impact of development including coordinated monitoring of outcomes.

Action Item 60.Reinstate more natural conditions in highly modified urban waterways.

Comment: Wolli Creek feeds into the Cooks River. The Wolli Creek Preservation Society has worked hard over many years to improve this waterway. Save Our Valley Incorporated is concerned that even if the actual housing developments do not encroach on the Regional Park area, the development will impact negatively on the health of Wolli Creek and the Cooks River.

Action Item 61. Protect and enhance biodiversity by: a. supporting landscape-scale biodiversity conservation and the restoration of bushland corridors b. managing urban bushland and remnant vegetation as green infrastructure.

Comment: The Eastern City District Plan contains an important aim of protecting Wolli Creek Regional Park and Bardwell Valley Parklands as critical remnant bushland and waterway. It states that this is an area of ecologically significant vegetation and is a "priority green grid project for both the South and Eastern City Districts". However, both District Plans show Priority Precincts (now 'Planned Precincts') slated for high-rise, surrounding this critical area. As the Wolli Creek Regional Park adjoins the Priority Precincts of Earlwood, Bardwell Park and Turrella we are greatly concerned about the impact of development on this precious piece of bushland and the native fauna and other wildlife that inhabit the bushland. Save Our Valley Incorporated is concerned that even if the actual housing developments do not encroach on the actual Regional Park area, the development - including light pollution from high rise buildings along the rail corridor - will impact negatively on the health of Wolli Creek bushland, for example, the flying fox colonies that use this 'green highway' to navigate from the city to their feeding grounds.

More information is coming to light all the time concerning the issues raised in the District Plans and we trust that there will be opportunities to provide that information to the Greater Sydney Commission and have it taken into account when it becomes available

Yours sincerely

Save Our Valley Incorporated Committee

12 December 2017

Annexure: Preliminary Heritage Report - Save Our Valley Incorporated

Please select the theme/s which best relate to your submission (in bold):

IMPLEMENTATION, INFRASTRUCTURE AND COLLABORATION

Three Metropolitan Cities *

Infrastructure *

Collaboration Areas *

Implementation *

Site specific planning proposal *

LIVEABILITY

Housing supply targets & locations *

Affordable housing *

Services & social infrastructure *

Cultural Diversity *

Place Based Planning & Great Places *

Healthy Communities

Arts & Cultural industries

Walking & Cycling

Heritage *

PRODUCTIVITY

Harbour CBD

Greater Parramatta

Western Sydney Airport & Badgerys Creek Aerotropolis

Centres

Health and Education and Innovation corridors/precincts

Industrial and urban services *

Freight and logistics

30 minute cities

Sustainability

Coast and waterways

Urban bushland and remnant vegetation *

Urban tree canopy*

Metropolitan rural areas

Parks and Open Space *

Green Grid Links *

Greenhouse gas emissions

Energy and water efficiency

Natural & Urban hazards

Annexure: Preliminary Heritage Report – Save Our Valley Inc. Bardwell Earlwood Turrella

END OF SUBMISSION

