

# **Draft South District Plan**

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[Submission to the Greater Sydney Commission on the Revised Draft South District Plan](#)

Dear Sir/Madam

I am a resident of Hurlstone Park and a professional civil and environmental engineer with many years of experience in strategic planning, economic analysis of service provision and sustainability issues. I am also an active member of the Hurlstone Park Association and therefore a well informed member of the community having had the opportunity to attend many public and private meetings on issues relating to urban densification and provision of community services in our area.

My personal submission relates to the revised draft South District Plan (SDP).

The SDP highlights the importance of collaboration, liveability and sustainability. However, I am extremely concerned that the Greater Sydney Commission (GSC) has concentrated more on marketing and glossy presentation (as have the Department of Planning and Environment and transport for NSW) than on detail or listening to local community views.

Thousands of residents have raised concerns through multiple fora on the SDP, Sydenham to Bankstown Urban Renewal Strategy (SBURS) and Metro extension. However, their concerns are not being seriously taken into consideration.

The SDP and associated SBURS and Metro extension will irrevocably change our region impacting on the existing social fabric and community spirit as well as highly sought after streetscapes, many with existing or potential heritage value. Such changes appear to be in direct conflict with many of the aims of the SDP.

A far more measured and sympathetic approach to urban densification is required that puts the needs of the existing communities and families first and draws on the highest sustainability principles for all new developments.

Sydney will have to grow to some extent but not necessarily to the extent portrayed in the GSC and DPE figures. We have a choice on whether policy drives a "Big" Australia and if so to what extent. We also have a choice on "where" in terms of "urban densification" and/or "regionalisation".

The push for a Big Australia and urban densification will ruin the cities we know and love, ripping apart the multicultural communities that it has taken generations to forge and eradicating the architectural and community individuality of our cities. It will be replaced with cookie cutter architecture which is cheap and nasty and with the barest minimum of sustainability principles applied.

For buildings constructed from now on we should use best practice "sustainability" and indeed "regeneration" principles if we are to assist in doing our bit in achieving global Sustainable Development Goals. The GSC documentation mentions sustainability, however, with very little detail on "how". Without leadership and major policy, regulation and management reform a transformation to beyond best practice architecture and new generation service delivery will not be embedded in urban form for years. It cannot be left to others including the developers to make this happen.

**I implore you to stop, fully engage and listen to the local residents and newly elected Canterbury Bankstown Council and find a way forward for our region that truly embraces measured densification and revitalisation in our area through true collaboration without ruining the existing social fabric and architectural merit of the region.**

I have many concerns on the revised draft SDP. Key concerns are provided as follows.

## **1. The “independence” of the GSC**

The GCS is an “independent” organisation. It is funded by the NSW Government with “*a duty to transparently and responsibly serve the public interest*”. However, the GSC plans seem to merely summarise the policies and plans of the Department of Planning and Environment (DPE) and transport for NSW (tNSW) rather than taking a highly valuable critical review role that ensures such policies and plans are in the public interest.

The DPEs SBURS aims to up-zone thousands of existing low-rise homes. The plans have been heavily criticised and strongly rejected by the local community affected. So has the inextricably linked tNSW Metro conversion of the existing T3 Bankstown line, which effectively acts as a trigger for unrestricted developer driven growth.

The community concerns have been heard by the newly elected Canterbury Bankstown Council (CBC) representing 350,000 people. The CBC have just submitted their submissions on the SBURS and Metro conversion EIS. Their submissions state that the **council does not support either the SBURS or Metro conversion** and they are highly critical of both on multiple fronts.

With hours of input from the local community in Hurlstone Park, this small village has been spared a large amount of inappropriate re-zoning, due to documentation of the high heritage value of the suburb, recognised by our District Commissioner Morris Iemma. Unfortunately surrounding areas, many with similar value have not been so lucky, with Belmore and Canterbury, for example, at risk of virtual demolition due to re-zoning of low-rise residential homes as part of the so-called ‘priority’ now named ‘planned’ precincts. Having four priority/planned precincts in such a short section of the T3 Bankstown line does not make sense, is not accepted by the community and seriously questioned by the recently elected CBC. The former Canterbury Council were convinced of the merit of proposing priority precincts in the area due to their short sighted greed of the promise of a \$5m bonus per precinct. This occurred shortly before they were removed from office.

The newly elected CBC, local state members of Parliament along the SBURS corridor and the NSW opposition are opposed to the excessive levels of growth of the SBURS triggered by the metro conversion and ridiculous density of the priority/planned precincts.

With such out cry by local residents, the largest council in NSW and local area state government representatives, an “independent” body such as the GSC should listen and seriously question the economic, social and environmental validity of the SBURS and Metro conversion in the SDP region.

## **2. Infrastructure**

The SDP (p 18, 20) indicates that it is in response to major transport investments underway including the T3 Metro conversion. However, interestingly when the revised draft SDP was released the public submission period for the T3 Metro conversion EIS was still open. This provides yet another example of the NSW Government calling for public submissions yet having little regard for the views of the public (i.e. merely going through the motions). If the GSC were truly “independent” and cared what the local communities thought or wanted then the SDP would not embed the Metro conversion or SBURS in the draft SDP as “done deals”. Even with so much Government money having been spent on marketing and glossy brochures the public have not been convinced of the merit of the SDP, SBURS or Metro conversion. They can plainly see the “lipstick on the pig” and that the plans are not in the public interest.

Action 6 (p 19) aims to “maximize the utility of existing infrastructure”. Why on earth replace the existing T3 line with a Metro conversion? There are many opportunities to optimise the T3 service, articulated by transport specialists such as Ecotransit, including peak period shifting, tunnelling at Sydenham, modifications to signalling and timetables without the need to replace the existing T3 line with a metro service with smaller trains and less carrying capacity. The economic, social and environmental impacts of the project have not been adequately addressed and have been highly criticised by the public and the CBC and their expert advisers. The long term impacts, and for that matter short term ridiculous construction impacts, of the Metro conversion are just not warranted for a metro service that replaces an existing service and which is not suitable for a length of service such as the T3 line.

The GSC should fulfil its independent role and critically analyse the merit of infrastructure projects such as the Metro conversion and associated privatization that the State Government uses to underpin its infrastructure projects. The Productivity Commission in its 2017 five-yearly review has identified the average 26% cost blowout for major infrastructure projects like Westconnex and the light rail and poor service delivery as a consequence of privatization. Why continue to flog a dead horse?

### **3. Collaboration**

The Canterbury-Bankstown corridor was chosen for high growth. However the SDP review forum was held in Penshurst, well outside the main affected area. Such deliberate venue choices, outside the heat of the local debate, is a common theme in Government “community consultation”. The latest forums were not well attended considering the population of 350,000+. Far more effort on engagement is required especially considering the multi-cultural diversity of the region and significant proportion of the population that are unlikely to have access to computers.

There is an overwhelming perception amongst the local community and newly elected CBC that planning policies are being imposed on the area, that they are costly, poorly thought through, putting the interests of developers ahead of the communities affected and are being rolled out without proper public consultation or input. There is enormous public opposition to the SBURS, Metro conversion, priority/planned precincts and many of the large developments that have been approved in recent years through various mechanisms which the Government has purposefully separated from local input and decision-making to aid the speed of development approval, effectively by-passing the public interest.

With planning of the scale being proposed and the associated impacts it is essential to conduct meaningful engagement with the local communities and the local council. The CBC has only just been elected after removal of the former councils, merger of councils and the Administrator period. It is not acceptable to impose such major infrastructure modifications, urban densification, planning modifications and population targets on the Canterbury-Bankstown area without meaningful dialogue with the “elected” representatives and the community they represent.

Whilst the SGC and DPE may have been seen to engage with the local council over the last one to two years there has been no continuity of council representation. This is not acceptable.

Also considering the size of the CBC (350,000 people) neither the GSC nor DPE can honestly say there has been sufficient community engagement with such a diverse multi-cultural population with such low turnout at arranged fora. For many residents English is not their first language and many aged residents do not have access to computers. The engagement is by no means best practice and community events on the GSC, SBURS and Metro conversion with a reasonable turnout have only been managed when local community action groups have been involved in letting the community know. This just isn't acceptable and does not represent “collaboration”.

If the current elected CBC were in office over the last two years whilst the SBURS, Metro conversion and SDPs were variously being exhibited then the Government would have seen far more public engagement and council reaction to the plans as the CBC would have assisted in ensuring the community was informed and realised the full implications of the proposed plans.

### **4. Liveability**

The projected levels of growth, suggested by the DPE and the GSC are completely out of proportion to what local communities view as fair or sustainable. This is particularly true for priority/planned precincts which were unveiled as 25+ storey towers by the DPE well after the initial Oct 2015 draft plans were released. On the draft plans released in Oct 2015 the buildings were represented as 9+ storeys. Then suddenly after public pressure to have workshops to discuss the plans, more than 6 months later, the DPE provided revised plans for the workshops indicating that 9+ storeys actually often meant 25+ storeys, on existing single storey homes. Such growth will reduce liveability, amenity, heritage and green space in an area which is already acknowledged as one of the most densely populated in Sydney (draft Urban Renewal Strategy, DPE, 2016), even before the unrestrained recent development along the Canterbury Road corridor over the last five years. The green/open space ratio in the Canterbury Bankstown area is known to be inadequate now, without the enormous population targets proposed.

Whilst the SDP emphasises the importance of health, active lifestyles, strong social networks and physical activity etc. replacing existing homes (and importantly the families/residents) with high density development undermines existing social networks, many of which are multi-generational families in close proximity. If not designed well such densification is likely to lead to deleterious impacts including physical and mental health due to lack of solar access and destruction of neighbourhoods and community spaces. With the unrelenting development along Canterbury Road the local community has little faith “best practice” or even “good” design will be incorporated into the thousands of new flats proposed. The mechanisms and indeed funds for ensuring best practice design, ample green space, increased tree canopy cover and infrastructure are not obvious in the plans.

There is no mention of critical social infrastructure such as expanding funding or services at Canterbury Hospital which lies in the middle of the string of priority/planned precincts which will make it very difficult to access due to the already highly congested Canterbury Road, both during Metro construction and due to the projected population growth. Nor are the mechanisms to ensure all the new/refurbished schools and recreational facilities are built before the proposed population are in place. It is essential to engage with the newly elected council on these important matters and ensure that developers adequately contribute to local infrastructure needs. The area is already stretched and has serious backlog issues with respect to refurbishment of aging infrastructure such as schools. Augmentation of existing social infrastructure and services must be adequately planned now. It cannot be left as an after thought.

### **5. Housing supply**

The assumption that generating supply will cater for population growth and solve the problem of affordability is far too simplistic. Over half the population growth in Australia is attributable to immigration, the rest to natural birth rate. Federal government policy on immigration is a major driver for housing supply. This needs to be acknowledged in the SDP. So too is foreign investment. Supply needs to be delivered equitably and fairly across the entire city. It should not be imposed in clumps in priority/planned precincts on existing single storey homes such as those in the Canterbury Bankstown LGA, which is to take 83,500 new dwellings according to the GSC, having already borne much of the brunt of development in recent years and already being acknowledged as one of the most densely populated areas in Sydney. It is essential that growth is encouraged in a fair and sustainable way that benefits all communities and residents across Sydney.

Housing affordability is not driven just by supply. It is a highly complex issue. Simply focusing on generating supply will not resolve affordability. Housing prices in Sydney and other large cities have been affected by under supply, but principally by the taxation system and the use of negative gearing which has allowed investors to build up real estate portfolios. Until this is reformed, merely creating more residential supply will not resolve this problem for young Australians. Creating more residential supply simply facilitates more investment opportunities for those that have money to invest.

The assumption that Sydney needs more supply based on projected population growth should be challenged given the documented number of empty apartments in Sydney and Melbourne. A recent analysis by Credit Suisse of NSW revenue revealed that at least 25% of new residential property was being purchased by overseas investors<sup>1</sup>. The City Futures Research Centre UNSW identified, in 2016, 90,000 vacant properties in Sydney. Issues related to foreign investment and tax incentives such as negative gearing need to be addressed.

The GSC appears to place faith in the DPE and developers to provide housing stock of sufficient quantity and quality. There appear to be no plans to mandate minimum quotas of affordable or social housing in developments. Without real engagement by the GSC in the driving issues of housing affordability and setting of minimum requirements for long term affordable or social housing it appears that developers will continue to profit above communities from the planned growth.

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<sup>1</sup> Financial review 11<sup>th</sup> October 2017, accessed 19<sup>th</sup> October 2017

<http://www.afr.com/real-estate/chinese-buy-1-in-4-new-properties-in-nsw-credit-suisse-20171010-gyy7nd>

## **6. Heritage**

Loss of heritage is a major concern with the proposed growth and development. The DPEs SBURS and priority/planned precincts as well as planned Metro conversion will wipe out swathes of historical buildings including thousands of irreplaceable federation homes and railway heritage items some of which are heritage listed and of state significance. This mass destruction of heritage buildings is contrary to the GSC objective of respecting local heritage. A full heritage assessment across the SDP region needs to be conducted and protection strengthened to minimise any potential impacts in areas of urban densification and/or major infrastructure development.

The DPE and the GSC will not deliver or create great places unless there is an understanding of the great places that already exist. The Chief Commissioner, for example, did not know of the many Federation homes in Haberfield being demolished for the Westconnex despite widespread community outrage and reporting on the news. Growth should be encouraged in areas that want it, on disused land not quality homes and in collaboration with communities and local government. The GSC should visit all areas marked for growth, talk to local groups that try to represent the views of their communities and understand what existing communities and historical value currently exists before trying to impose cookie cutter development that will obliterate the existing character of each area.

## **8. Sustainability**

The importance of green spaces, tree canopy cover and the protection of natural environments are addressed in the revised draft SDP, but again in insufficient detail. The Sydenham-Bankstown corridor has only been offered spare land along the rail corridor where available. This is simply unacceptable given the acknowledged low proportion of open space per capita already in this corridor and high usage rates of existing facilities even before urban densification. The revised draft SDP highlights the need for additional open space and sports facilities along the Sydenham-Bankstown corridor, the constraint to do this due to densification in the area and yet the need for such renewal and infrastructure programs to deliver net increased space. With the level of densification proposed this equation is highly unlikely to work.

There needs to be an audit of tree canopy cover and green space and assessment of needs for the existing and any proposed population growth along the Canterbury Bankstown corridor. All developments that reduce tree canopy cover and green space should have to engage in environmental off-set schemes that provide green space and tree cover locally. The overall level of green space in proximity to urban form needs to be increased to meet liveability and sustainability objectives.

The revised draft SDP highlights the importance of water and energy efficiency, minimisation of waste and the use of circular economy principles such as energy from waste. Again, however there is a lack of detail on how this will actually be achieved. With such significant proposed growth rates in Sydney over the coming years, construction of so many new buildings and the aspiration of net zero emissions there are both enormous opportunities and challenges.

To achieve such a goal as net zero emissions requires design excellence and a fundamental shift in how we manage our water, energy and waste services. It will require leadership from the government and radical changes in policy, regulations and management. Such changes can take years to put in place and enact if not put in place early and effectively. If we don't act now in making those policy, regulatory and management changes we will have "missed the boat" due to the rapid building of shoddy developments being put up by developers in the meantime adhering to the minimum requirements of BASIX at best.