

# Draft North District Plan

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Organisation name: Hunters Hill Trust

Organisation type: Community Group

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Submission content: Please find Attached a submission from the Hunters Hill Trust regarding the Revised Draft North District Plan, and also a copy of our previous submission.

Number of attachments: 2



*PRESERVING AUSTRALIA'S OLDEST GARDEN SUBURB*

**██████████ HUNTERS HILL, N.S.W. 2110**

27 March 2017

**ADDENDUM TO OUR OCTOBER 2016 SUBMISSION  
REGARDING THE WORK OF  
THE GREATER SYDNEY COMMISSION**

Lucy Hughes Turnbull  
Chief Commissioner  
Greater Sydney Commission

Dear Mrs Turnbull,

The Hunters Hill Trust wrote to you in October 2016 (see our submission attached) expressing our concern that heritage preservation and conservation were not specifically included in the aims and objectives of the GSC

With the release of further detailed information and following our attendance at local consultation forums, we now know more about the Commission's plans and ideas for the future development of Sydney. This is an addendum to our previous submission, continuing our focus on the place of natural and built heritage and the importance of heritage and conservation in the Commission's plans, particularly in relation to the North District.

**Guiding principles for the Commission**

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An important aspect of the Commission's work, as stated in paragraph b) of its objectives is: *To promote orderly development in the Greater Sydney Region, integrating social, economic and environmental considerations with regard to the principles of ecologically sustainable development contained in section 6 (2) of the Protection of the Environment Administration (POEA) Act 1991,*

The POEA Act states that ... ecologically sustainable development requires the effective integration of economic and environmental considerations in decision-making processes and that this can be achieved through the implementation of the following principles and programs:

*(a) The precautionary principle—namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.*

*(b) Inter-generational equity—namely, that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations.*

*(c) Conservation of biological diversity and ecological integrity.*

*(d) Improved valuation and pricing of environmental resources.*

**The Trust questions whether adequate attention is being paid to the important principles of Ecologically Sustainable Development (ESD) in the formation of the District Plans.**

During the establishment period for the Commission and the drafting of the six District Plans, the level of development across our city and suburbs has continued alarmingly. It is doubly alarming that the GSC is working on the premise that this rate of development will continue.

### **Targets for the North District Plan**

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Behind the aims and objectives of the GSC is an assumption that Sydney's population will continue to grow at the current rate. We are already experiencing the negative impact of this rapid change, together with a sense that an increasingly congested and polluted future has already arrived. Nature and heritage are already under threat right across the metropolitan region and the level of threat is growing.

The Greater Sydney Commission's Plan for the North District sets out a target of 25,950 additional dwellings by 2021. The overall target for Greater Sydney is 189,100 additional dwellings in this time frame, although the Commission is working towards a 20 and ultimately 40 year "vision".

There is no comfort in Hunters Hill being allocated only 150 extra dwellings because the high-rise developments already under construction or approved will exceed this allocation. We are yet to feel the full impact of this development.

The Trust is looking beyond our locality to include the broader LGA that will merge Hunters Hill with Ryde and Lane Cove when their inevitable amalgamation is finalised. Thus a further 10,750 dwellings are proposed for the new merged LGA.

However, there is nothing included in this housing increase for additional essential infrastructure such as roads, public transport, schools etc that are needed to support this target. This lack comes on top of the failure to provide infrastructure for the increase in population that has already occurred in the last couple of decades in the Municipality of Hunters Hill alone to say nothing of the greater metropolitan area.

**The Trust questions why the GSC is so committed to the assumption of population increase as the major driver of Sydney's future.**

It is clear that Sydney is unable to cope with the growth that has occurred only in the last few years, let alone decades. Days of rain already impede traffic, create major disruption and see dangerous volumes of stormwater, including overflows from Sydney Water's inadequate sewerage system, flowing into our waterways.

We ask this simple question: *"How can we have proper planning when population growth, which is the major driver of all the new housing, jobs and infrastructure, is virtually unplanned?"*

Obviously there is a further question: *"How long can the population of Sydney continue to increase before living here becomes untenable?"*

We also question the role of demographers in accurately predicting what this growth will require in terms of infrastructure such as public transport links, sewerage capacity, new schools and other amenities.

The Trust also believes that the mix of the population growth figures that the GSC has quoted is incorrect because the impact of migration on the projected totals has been understated. Clearly Australia has global responsibilities when it comes to migration, but, unlike natural growth, migration is something that can be planned.

### **Quality of development**

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The high-rise development currently being built is poorly designed and mostly located along busy arterial roads – the worst possible environment for housing people. There is also no proper “place making” for the people who live in the new housing. Where are the additional squares, theatres, libraries etc. for the new housing that’s been built along Victoria Rd for example?

How the GSC hopes to improve this has, so far, not been spelled out in any detail. Clearly heritage protection and the conservation of the existing character of local areas must be essential considerations in planning for quality development. As well, these considerations must be integral and up front in making any planning proposals. They should not be a token add-on at the end of the process. We optimistically look forward to hearing more from the Commission.

### **Loss of cultural heritage and local amenity**

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To reiterate, The Trust believes it is essential to protect the existing character and amenity of local areas as part of any new plan for change. Such qualities have gradually been built up over time and are intrinsic to the historic memory of those places.

Existing neighbourhoods act as social hubs within which people identify and become involved. They strongly value their cultural heritage as well as their existing green open spaces, schools, shops and amenities, which should all be within reasonable walking distance of where people live.

Local neighbourhoods and their cultural history need to be respected and not viewed as standing in the way of profit-driven high-intensity development, which is destroying existing suburbs with a crude one-size-fits-all model for development control.

As well, the imposition of change without adequate licence from the community, which is what is now happening, disrupts social cohesion and stability. Consultation with existing community groups is an essential ingredient in the process of making new plans.

With the extension of Exempt and Complying Development Codes, the character of existing places is already under an increased threat. We are looking to the Greater Sydney Commission to review this legislation so that local communities can continue to have a say in what gets built and a more professional assessment is made of proposals, rather than leaving such assessment to the simplistic arithmetical controls of the complying codes.

### **District Plans need to be amended to address the following:**

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- Strategies to implement the principles of Ecologically Sustainable Development must be clearly specified throughout the document;
- Systems are required to ensure that heritage items and Heritage Conservation Areas are fully identified and protected from demolition and/or inappropriate development with

a professional assessment of all significant proposals rather than the tick of a private certifier's pencil;

- Protection of key sites of national and regional significance, including Gladesville Hospital for its heritage and open space values;
- Strategies to reduce waste of resources from demolition of useable homes and buildings. Focus on adaptive re-use and a resource tax to place a value on the benefits of retention of existing buildings;
- Policy relating to design excellence to be clearly defined and implemented with a clearly stated method of how "design excellence" can be assessed.
- Protection of biodiversity and preservation of the 'Green grid', particularly remnant bushland, urban tree cover and wildlife habitat corridors;
- Security for remnant Cumberland plain vegetation and vital waterways that are endangered by proposed excessive development in western Sydney;
- Ensuring Sydney's food security by keeping further residential development away from the remaining peri-urban agricultural lands;
- Recognising the value of gardens and the ecosystem services they provide as carbon sinks, havens for biodiversity, retention of rainwater and avoidance of stormwater pollutants flowing to waterways and wetlands;
- Planning to improve public transport systems rather than relying on environmentally damaging and costly major roads such as Westconnex.

There is an ominous sense of a development juggernaut in charge, leading the average citizen to feel powerless to have any say in what is happening to their suburbs.

The Hunters Hill Trust believes the creation of The Greater Sydney Commission is an acknowledgement by the State Government that the existing state of affairs needs to change. We would like to be part of the process and are keen to remain engaged with the work of the Commission.

Yours Sincerely,

A handwritten signature in black ink that reads "Tony Coote". The signature is written in a cursive, slightly slanted style.

Tony Coote,  
President, The Hunters Hill Trust



## Preserving Australia's Oldest Garden Suburb

[REDACTED]  
Hunters Hill, NSW 2110

Ms Lucy Hughes Turnbull,  
Chief Commissioner,  
Greater Sydney Commission,  
GPO Box 257,  
Parramatta, NSW 2124

15 December 2017

Dear Ms Turnbull,

### **Submission on the Revised draft North District Plan**

The Hunters Hill Trust wrote to you in October 2016 and again on 27 March 2017 (our submission of the latter date is attached). We expressed in detail our concerns that heritage preservation and conservation were not a specific focus within the aims and objectives of the GSC and were certainly not being reflected in the draft North District Plan.

We are now writing to you following the release of the revised draft Plan. Our interest again centres on the importance of Sydney's natural and built heritage and their position within the Commission's plans and aspirations in relation to the North District, as well as more broadly. We are once more disappointed to see that there remains scant evidence of respect for retaining our historical places as our city grows and changes. The Plan continues to pay lip service to the protection of built heritage and the conservation of Sydney's natural values.

The Trust considers that the draft North District Plan contains only limited amendment. We wish to make the following comments for your consideration, in addition to our previously outlined concerns.

### **ESD as a basis for the Commission's guiding principles**

As stated previously, the Trust is concerned that the principles of Ecologically Sustainable Development (ESD) are not sufficiently in evidence as a guide for the Commission's work. Although the draft District Plans have been reviewed following the earlier consultation period they appear substantially the same in their response to implementing ecological sustainability. In particular, it is of concern that of the three themes directing the GSC, Sustainability remains the third

consideration after Productivity and Liveability have been detailed in the documents.

No-one denies that a sound economic base and infrastructure are essential but without the foundation of a healthy environment and a cohesive community a city cannot grow to be the best it can be. Sustainability must be of prime concern rather than appearing an add-on. In particular, mitigation against the impending impacts of climate change is not given enough prominence in a Plan that determines the viability of an ever-expanding city such as Sydney.

The Trust continues to question why the GSC does not examine the assumption of population increase as the major driver of Sydney's future. We also ask how the exceedingly rapid rate of this growth can occur successfully without adequate oversight - and the lack of a planning system that takes social and environmental imperatives into account equally with economics - another major principle of ESD.

### **Rate of growth**

The rate of development across our suburbs has continued at a disturbing pace since the commencement of the Greater Sydney Commission. The system favours developers. They march on with very little impediment to their progress while communities are disempowered. The draft amendment to *A Plan for Growing Sydney* (November 2016) states that by 2036 the city will "accommodate 1,740,400 million additional people and more than 725,000 new homes". The North District will take up 11% of that total growth.

Since the GSC has not revised these figures downwards, we must assume the Commission accepts that this rate of development will continue. This is in spite of the clear concerns of so many suburban residents about the current high density policy which is altering the skyline, causing congested roads and reducing quality of life. Nature and heritage are already at great risk across the metropolitan region, as described in previous submissions, and this can only increase.

The Trust would hope that the Commission can use its influence with the State and Federal governments to question the high level of annual population increase and the consequent over-development that will inevitably result in a lack of capacity to sustain the beneficial characteristics of our major cities.

### **Quality of development**

The Trust is particularly concerned with the high rise development currently being built along Victoria Road, Gladesville, most of it very poorly designed and located without setback along this constantly congested arterial road. This is surely the least healthy environment for housing and yet there is more to come. Recently a new childcare enterprise has been situated directly next to this polluted main road. This represents faulty decision-making.

A massive over-development of the Gladesville Shopping Village has been proposed for some years now and has received pre-Gateway "strategic merit" to proceed to

the next stage. This is in spite of greatly exceeding the controls set down in Hunter's Hill's Local Environment Plan and having major local opposition.

How this mode of profit-driven development is likely to improve is not clear to the Trust. Along with heritage protection, the conservation of the existing character and the social amenity of local areas, quality of life must equally be an essential consideration in planning for our suburbs.

The further loss of garden space and enjoyment of outdoor living is clearly being signalled by the changes occurring. While the District Plans speak to a lifestyle where communities and amenities are linked by walking paths and bike tracks, this seems to largely contradict what we see happening around us. Well functioning neighbourhoods are harder to sustain in a high density residential environment.

### **Protecting our natural heritage**

While the Green Grid is now a more developed concept, the associated documents are replete with motherhood statements that provide little confidence that the quality and extent of our public open space will remain. In particular, we are concerned for our bushland heritage which gives Sydney its extraordinary character as a global city capable of supporting and valuing indigenous culture, native wildlife and biodiversity at its core.

So many of the much-loved bushland remnants were saved by the actions of local residents and remain in the care of volunteers to ensure their viability. Sadly, the fight goes on to protect this precious irreplaceable heritage from encroachment and insensitive development.

The Green Grid usefully provides mapping of the open space currently available for public recreation as well as that required for nature's intrinsic needs. However, with the high population projections and rising rates of visitation the danger is that recreational and tourism demands will be given priority to the detriment of natural places, the urban forest, wildlife habitat corridors and heritage-listed parklands. Sydney's unique character will become further diminished.

### **Conclusion**

The Trust had hoped for amendments to the North District Plan that address our concerns, as previously outlined. The following are briefly reiterated:

1. Strategies to implement the principles of Ecologically Sustainable Development need to be clearly specified throughout the District Plans and be evident in the work of the Greater Sydney Commission;
2. The required planning for climate change mitigation to provide sustainability for the Sydney region must be given far greater priority in the Plans;
3. Heritage items and Heritage Conservation Areas need to be identified, protected from demolition and/or inappropriate development and require a

professional assessment of all significant proposals, not simply a private certifier's approval;

4. Key sites of national and regional significance, including Gladesville Hospital, must be fully protected for their heritage and open space values;

5. There must be a reduction in the wastage of resources from demolition of useable homes and buildings, with greater adaptive re-use to increase the retention of existing and heritage buildings enabled;

6. An urgent review is needed relating to the proposed excessive development in western Sydney to give equity to residents, security for remnant Cumberland plain vegetation and protection of vital waterways;

7. Sydney's food security must be protected via permanently conserving all peri-urban productive lands;

8. Improved planning is required for public transport systems, pedestrians and cycling.

The Hunters Hill Trust thanks you for a further opportunity to engage with the work of the Commission.

Yours Sincerely,

Alister Sharp,  
President, The Hunters Hill Trust