

Draft South District Plan

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Organisation name: Keep Our Area Suburban

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First name: Barbara

Last name: Coorey

Suburb: 2192

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Number of attachments: 1

Submission Re Revised Draft District Plan - South

This submission is to outline further errors, misconceptions, omissions, bias and a general lack of procedural fairness and transparency in the document title *"Our Greater Sydney 2056 Revised Draft South District Plan*. The aforementioned are in addition to our submission dated 2 April 2017.

We note that none of the issues raised in our paper of 2 April 2017 have been addressed and or rectified. The situation seems to be that the Greater Sydney Commission (GSC) has "buried its head in the sand" on these issues.

The revised District Plan cannot be relied upon as it lacks proper community consultation, relies on creation of Priority Precincts which lack planning logic and more importantly a lack of a paper trail, lacks recognition of the flawed Canterbury Local Environmental Plan 2012 which upzoned for 44,000 units, lacks recognition of heritage and character of the suburbs earmarked for ultimate demolition by the District Plan, lacks recognition of open space and recreation and critical infrastructure for such a dramatic increase in dwelling numbers, continues to rely heavily on a flawed Sydenham to Bankstown Urban Renewal Strategy and accompanying Metro which have not been received planning approval and have just come off public exhibition.

Lack of Proper Public Consultation

What is the most concerning now is the so called public consultation did not occur in the suburbs that are to take the bulk of the housing targets for the South Region. The Canterbury Bankstown region is earmarked to take 13,250 dwellings out of the total of 25,000 proposed 5 year target for the entire South Region representing 53% of the total targeted growth.

The Community Feedback Workshops (for the Revised Draft Strategy) for the GSC South were held at Sutherland and Penshurst. Curiously Penshurst railway station is not earmarked to be a Priority Precinct and neither is Sutherland Railway station. **The Canterbury Bankstown Council region has been earmarked for 6 Priority Precincts being Canterbury, Campsie, Belmore, Lakemba Riverwood (and the Riverwood Estate State Significant Precinct) and Earlwood (subsumed in the Bardwell Park Turrella Priority Precincts)**. Yet no public consultation by the GSC South has occurred in these suburbs for this revised Plan. Furthermore the requirement for registration in order to participate reflected the non public access to this forum.

Priority Precincts - Lack of Paper Trail

We note that the Priority Precincts nominated in the aforementioned paragraph were not referred to at all in the Draft District Plan dated November 2016. The Priority Precincts for the Canterbury Bankstown LGA were announced on 1 June 2017 by the Premier.

These Priority Precincts announcement and inclusion in the Revised Draft District Plan displays what appears to be planning on the run – incoherent, unplanned and damaging to the goals of a liveable, affordable and sustainable Sydney.

Canterbury Local Environmental Plan 2012

The *Revised District Plan* fails to acknowledge the Canterbury Local Environmental Plan 2012 gazetted on 1 January 2013 which upzoned for an additional 44,000 dwellings. This was done (by the former Canterbury Council which was dismissed on 12 May 2016 and which is now the subject of ICAC investigations) without notification to adjoining property owners and transformed Canterbury Road from Hurlstone Park to Roselands into a wall of tower blocks (in some cases up to 10-12 storeys) and Charles Street Canterbury and Burwood Road Belmore, Haldon and Lakemba Street Lakemba and Broadway Punchbowl.

The lack of procedural fairness afforded to adjoining single storey residential property owners was indicative of the way the former council appears to have run roughshod over residents and ratepayers rights of this former local government area. The only technical report that the Council used to base the removal of Floor Space Ratio and increase of height to 18 metres and beyond into the newly created B2 and B5 zones was the Canterbury Road Masterplan .

It is of concern that the *Draft Plan* does not acknowledge this CLEP 2012, the Canterbury Road Masterplan and the upzoning it created. It is understood that the Department of Planning provided government grants for both projects in order to accelerate housing supply. Yet the District Commission seems to have these missing from the analysis.

No proper allocation of housing targets can be correctly set for the newly created Canterbury Bankstown council area until the housing targets and upzoning as a result of the aforementioned are taken into account.

The Canterbury Residential Strategy 2013 which (which was also sponsored and paid for by the Department of Planning) appears to be highly flawed. It is worth noting that many of the planning proposals (which were reliant on the Canterbury Residential Strategy) have either been suspended or not proceeded with. No reliance can be placed upon this strategy given the controversy that currently surrounds the now dismissed council.

It is to be noted that no technical report were prepared (by the former Canterbury Council) to remove the Floor Space Ratio and increase heights in the newly created B2 town centre zones or the B5 Shop Top Housing Zones in the flawed CLEP .

Lack of Open Space and Infrastructure

It is to be noted that the Draft does not acknowledge that the former local government area of Canterbury is in the bottom level benchmark for open space requirements in the state of N W.

It is concerning that there is no reference to any upgrading of Canterbury or Bankstown Hospitals to cope with the extra population to be generated by the extra unit dwelling requirement in what is considered an inappropriate period of 5 year target.

There are no plans for schools, daycare centres, extra police and ambulance services for the increase in population in such a short period of time. There are no plans for open space and recreational facilities which are to be accessible by these unit dwellers living in the LGA of Canterbury Bankstown.

National Trust Conservation Areas and Department of Planning and Heritage

The architectural firm –Robertson and Hindmarsh prepared a study in February 1996 for the National Trust examining interwar housing in 20 Sydney Local Government Areas and in 2 NSW country local Government areas. **The funding for the study was allocated in 2 stages pursuant to the National Estates Grants Program and was administered in NSW by the Heritage branch of the NSW Department of Environment and Planning.**

The study concluded that Ku ring gai and Canterbury had the highest number of identified precincts being 23 and 24. The National Trust listed eighteen Urban Conservation Areas in the former local government area of Canterbury in 1998 and 1999.

It is now these very areas nominated as part of the Priority Precincts and Sydenham to Bankstown Urban Renewal Strategy (in the suburbs identified within the 400 and 800 metre radius in the former local government area of Canterbury) that are earmarked for massive upzoning of between 4 to 25 storeys and ultimate demolition.

We note with alarm under the heading *Heritage and character* in the Revised District Plan no heritage discussion and or areas are nominated for the former local government area of Canterbury which is to bear the brunt of the upzoning and demolition.

District Commissioner's Comments

The District Commissioner visited Hurlstone Park in July 2016 and he was reported as having made the following comments in the Bankstown Express on 6 July 2016;

It's clear to me from my observations that the scope for development in Hur/stone Park is limited. I just do not see that Hur/stone Park is the place for intense development for various reasons. The housing and the streetscape is unique. Intense development will have to take place elsewhere.

He pointed to existing city centres as Campsie as the most "practical option" to consolidate development.

The above comments are of concern in that the District Commissioner appears to have already formulated a regime for where the "intense development" is to take place without having read or heard the case whereby the same arguments and logic would apply to Campsie and other suburbs.

There is no information from the District Commissioner as to what the "*various reasons*" were.

The writer concurs fully for the preservation of Hurlstone Park and also believes that the other suburbs earmarked for demolition are worthy of the same comments and support for retention.

It is of great concern that Campsie has been earmarked for this intense development. Campsie is already very crowded and highly densely urbanised. There is very little open space other than Anglo Park which is used to capacity at all hours of the day 7 days a week. There are many homes in Campsie which are worthy of retention together with the art deco shops in Beamish Street which date back to the early 1900's. No thought has been given to the retention of this heritage suburb.

Railway and Urban Renewal and Canterbury Road to Increase Housing Supply

The Draft relies on the Sydenham to Bankstown Urban Renewal Strategy and renewal along Canterbury Road heavily to achieve the dwelling target for the next 5 years.

The Sydenham to Bankstown Urban Renewal Strategy does not just involve infill development but rather the rezoning of garden like suburbs (ranging from Marrickville, Dulwich Hill, Hurlstone Park, Canterbury, Campsie, Belmore, Lakemba, Wiley Park and Punchbowl) which contain War Services Commission homes, and areas earmarked as National Trust Conservation Zones for demolition in order to construct up to 36,000 units.

Up to 5000 to 8000 homes are earmarked for demolition in order to construct the 36,000 units for the Metro which range in towers from 4 storeys to up to 25 storeys in predominantly low rise low density suburbs.

Incorrect Maps for Priority Precincts

We note that the rezoning maps as first published for The Sydenham to Bankstown Urban Renewal Strategy have continuously changed over a period of 2 years. We note that the figures for unit construction differ widely with our independent analysis undertaken and the figures as provided by the Department in the exhibited documents as follows:

Department Unit Figures		Our Analysis for Units
Canterbury	4000	18000
Campsie	6000	40,000
Belmore	3000	12,000 (excl Yellow areas)
Lakemba	3000	18000
TOTAL UNITS	16,000	88,000

We are somewhat puzzled as to why the Strategy which earmarks another 88,000 unit dwellings for the former local government area of Canterbury (excl Wiley Park and Punchbowl which have not been independently verified) area did not take into account these proposed dwellings from the CLEP 2012.

Of concern is the calculation of the independent analysis of the 4 priority precincts total of 88,000 units. When one then adds the flawed CLEP 2012 dwelling figure of 44,000 one then reaches a figure of 132,000 units – This should be of concern to the GSC Draft Revised Plan as the forecast dwelling figures for Canterbury Bankstown of 13,250 for next 5 years cannot stand in view of the flawed dwelling figures for the 4 Priority Precincts.

The maps as exhibited are cause for concern due to the misleading nature of these exhibited documents over a 2 year period upon which other plans were reliant upon- namely the Draft District Plan – South.

Launch of Directions for A Greater Sydney

We understand that a paper titled "*Responses to a new growth paradigm in Sydney*" was presented by Patrick Fensham at an event on 22 August 2017.

This event was under the auspices of the **Planning Institute Australia's (PIA) Planning Reform Series** (of which Mr Brendan Nelson, Deputy Secretary of Department of Planning is also the President of the Board of Directors of the Planning Institute Australia)

Of particular interest is the use of the Sydney to Bankstown Infill example in the paper. We draw your attention to pages 5 and 6 under the heading *Not business as usual...*

- **High rates of infill required (at 75% approx.. 25,000 per year)**
- **Strategies support development near public transport**
- **We're used to greenfield planning but we've never done this before (eg Syd to Bankstown reference to social infrastructure, p30**
- **The liveability of our cities is being challenged**
- **Concerns are not just NIMBYISM; communities are mobilising**

We also point out page 9 of this rather informative paper under the heading *MappiItg can assist visualisation...Access to Open Space and Recreation* where one can clearly see the low score for the Bankstown line for open space and recreation.

Of further interest is the following (page 7) from the paper titled -'*Ensuring a liveability dividend from growth: A new Urban Renewal Community Compact*' dated June 2017 by Patrick Fensham as follows:

..!he intention to apply a value capture funding mechanism has to be signalled early. If land values rise in anticipation of future additional redevelopment potential without such a signal, then it will be more difficult to fund public benefit works anticipated by and committed through any Urban Renewal Community Compact.

Sydney and Melbourne are growing at unprecedented rates, including significant development in established areas. ...conventional structure planning of established areas with historical subdivision patterns and existing communities, followed up by 'catch up' infrastructure provision, will not be sufficient to ensure that quality of life standards are maintained let alone enhanced.

We are pleased at least Mr Fensham has recognised the historical nature of the subdivision patterns of the areas and existing communities.

The Draft District Plan does not provide any information as to how many homes are to be demolished in order to provide the 5 year dwelling target. The Draft does not recognise the heritage significance of the communities in the Sydenham to Bankstown Urban Renewal Corridor.

The Draft does not recognise the suspension of the heavy rail line between Sydenham to Bankstown for a period of at least 12 months in order to privatise the line and convert it to a privatised metro line. The Draft does not recognise or discuss the economic dislocation to shopping centres of Hurlstone Park, Canterbury, Campsie, Belmore, Lakemba, Wiley Park, Punchbowl and Bankstown by shutting down the heavy rail line and the placing of at least 30,000 people on buses (in peak time only) and 100,000 persons on buses each day for a period of between 6- 12 months between peak operating times .

Most importantly the Draft does not consider the removal of the direct train travel link which currently exists on the Bankstown Line which will be removed if the Metro proceeds forcing people to change at Sydenham or Central for the current city circle stations.

Commuters travelling west of the Bankstown line will be forced change twice – once at Bankstown to change from the heavy rail to metro and secondly at Sydenham or Central for the current city circle stations.

The effect of the removal of the direct city circle route and the placement of 30,000 commuters onto buses during peak times and 100,000 person daily (and the resultant planned 5 year construction for this project) from Bankstown to Sydenham has not

been analysed or referred to in the Draft and the writer believes that this critical issue will substantially affect the dwelling uptake and projected construction targets.

The Draft does not refer to the alternative travel plan for the suspension of the T3 Bankstown Line which will see a total of 100,000 persons placed on buses each day to be bused to East Hills Airport and Southern Line due to the fact that Sydenham will not be able to cope with the planned 101 buses per hour required to go there.

What is of concern is that the Draft Plan makes no reference regarding ramifications of the planned shutdown and construction of the main infrastructure trigger - Metro at the time that the unit dwelling target is to take place – The Metro is not planned to be operational until 2024 yet the housing target plan is to take place almost immediately if the Draft Plan is enacted.

Flawed CLEP 2012 and lack of infill sites

The Draft does not acknowledge the haphazard and procedurally unfair manner by which the CLEP 2012 was enacted. It was this flawed CLEP 2012 which facilitated the inappropriate badly planned development along Canterbury Road . This development has (and continues to) receive much critical media attention.

There are no infill development areas along the Railway Corridor to achieve the dwelling targets as set by the Greater Sydney Commission. There are also very few infill development areas along Canterbury Road Corridor to achieve these targets.

Concerns have been expressed(by both the community and the Department of Planning) about the removal of employment generating sites from Canterbury Road for the construction of the tower units and to date no information has been provided as to what can be done to ameliorate this . Any more planned development along Canterbury to achieve housing targets must take into account the removal of these employment generating sites. The replacement shop at ground floor with no visible street parking are mere tokens to justify the shop top housing development which is the predominant use.

Housing targets across Metro Sydney are unbalanced and inequitable.

The writer is concerned at the unbalanced and fairly discriminatory manner by which the Greater Sydney Commission has imposed the dwelling target for the Southern District in comparison to other areas . A quick analysis reveals dwelling targets of 300 for Woollahra LOA, 150 for Hunters Hill LOA and 300 for Mosman LOA as set out in their Draft District Plans.

For the public to have confidence that the process by which the Greater Sydney Commission has allocated the dwelling target to the various Districts the aforementioned targets require immediate revision.

Conclusion

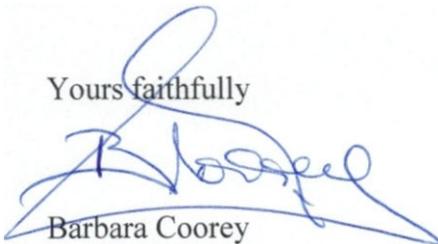
The writer is concerned that the flawed CLEP 2012 has already delivered a dwelling housing target much to the detriment of the local community in terms of destruction of neighborhoods and amenity of the local area. All this was done without proper community consultation, no procedural fairness and a lack of transparency.

In order for the projected dwelling targets to be attained the CLEP 2012 cannot remain in its present form. If the CLEP 2012 remains in its current form it will involve a form of "double dipping" which will be counter productive to the local community. The Draft District Plan must take into account the up zoning of the 44,000 dwellings which was created by this LEP as part of the dwelling target for the area.

The Draft District Plan also relies heavily for Dwelling target numbers on the Draft Priority Precincts and the highly flawed Sydenham to Bankstown Urban Renewal Strategy. They must be excised from the Draft District Plan as their status has yet to be determined. The dwelling targets set for the Canterbury Bankstown appear to be indicative of a modus operandi of literally dumping and imposing tens of thousands of unit in an Council area (former Canterbury Council) which is the subject of investigations by ICAC for its planning decisions.

We ask that the GSC give due consideration to heritage, infrastructure, open space and recreation requirements and procedural fairness in a revised version of this plan as a matter of urgency as the aforementioned appear to be lacking and make this Draft Plan highly defective.

Yours faithfully



Barbara Coorey

For and on Behalf of KOAS (Keep Our Area Suburban)



Belmore NSW 2192

15 December 2017