



PRESERVING AUSTRALIA'S OLDEST GARDEN SUBURB

P.O. BOX 85, 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

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

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

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

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:

- 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