



Preserving Australia's Oldest Garden Suburb

P.O. Box 85,
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