

Draft Local Housing Strategy (8 Dec 2020) Submission by the Hunters Hill Trust

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Please accept this submission to Council, staff and Councilors regarding the Draft Local Housing Strategy

Summary

Behind the analysis and proposals of the Draft Local Housing Strategy (dLHS) is an assumption that Hunters Hill housing density must increase. Certainly, Government has imposed a modest increase, and undoubtedly those who profit from development would support a greater increase, but this Strategy should satisfy the *'needs and aspirations'* of the residents. This draft Strategy fails to establish whether the residents of Hunters Hill seek more than the current continuing increase which alone will satisfy Government's requests.

As observed in the Executive Summary of the dLHS, *'Development in Hunter's Hill will remain highly constrained and land/property is set to become increasingly unaffordable. A capacity assessment under existing planning controls reveals very limited ability to support new development across the majority of the LGA. These factors, combined with slow population growth and a relatively small population, mean that implied dwelling demand as assessed by NSW DPIE capacity experts remains low.'*

In recognition of the predictions of the Department of Planning, Industry and Environment (DPIE) and the recommendations of the Greater Sydney Commission (GSC), the dwelling targets for Hunters Hill are modest relative to much of Sydney, and most will be achieved by continuing the current level of development. While Council is obliged to prepare a housing strategy it need not impose a greater increase than that suggested by Government, and should not use this opportunity to formalise the suggestions made in HH Local Strategic Planning Statement of 2019 (LSPS), and the draft Community Infrastructure Plan 2020 (dCIP); still in draft form.

Major shortcomings of the Strategy

- The strategy fails to meet the Vision stated at its beginning (p4). The first paragraph of the Vision would apply to anywhere in Australia. And the strategy simply fails to satisfy the requirements stated in the second, namely to *'retain its current low-scale urban form whilst prioritising the protection of heritage, significant built and natural environs and unique garden suburb character.'*
- The assumption that a great deal of higher density housing is required, when the requirements of Government are quite modest, and residents have not been consulted for their views.
- Failure to discuss the constraints which give Council no direct ability to influence development in those parts of the LGA subject to the State Government's Complying Development.
- Failure to explain how or where in the Municipality *'affordable'* housing and accommodation for *'downsizers'* can be achieved and be compatible with environmental improvement.
- Failure to clarify Council's intents for the Council Works Depot, recognised as one of the possible sites for redevelopment in the draft CIP, in spite of the possibility of it's redevelopment being mentioned in that document.
- Inclusion of the expansion of retirement accommodation and aged care in the Priorities and Actions of Section 6 in spite of stating that there are no available sites on which to

locate them and there being no analysis of the number of existing retirement and aged care locations and capacity.

- It is disturbing that the document is not identified as a draft (rather than an agreed document) because there is no backing for some actions stated as already completed. For example, the Introduction (Section 1.1) states that Council has consulted with *'community housing organisations, seniors living providers and the Sydney Metropolitan Aboriginal Land Council (Metro LALC)*, yet the body of the document fails to reference or provide the content from these consultations, and simply states the intention to consult in the future.

Complying development

Thirty percent of the municipality lies outside the parts designated as Conservation Areas, and therefore outside the direct control of Council because it is subject to Complying Development. This sees modest-sized, single-storey family homes being replaced with large two-storey, family homes, not dual-occupancies or apartments, thus not altering the housing density but in many cases depleting the suburb of much needed tree canopy and green space. The implications of this need to be explored in the dLHS and a case made for some alternate thinking that encourages best design practices, preservation of scale and character of our suburb and innovation in providing additional accommodation, such as by sympathetic additions and 'granny flats'. The complying development laws are promoting unsustainable development that is impacting neighbour amenity and eroding the strong sense of community that Hunters Hill has historically enjoyed.

Ageing of the population

As shown in Table 4.1, forecasts for the population to 2041 show that while the total population will fall, the proportion aged over 54 years will increase by an average of 1% every 5 years, equivalent to 30 people entering this category each year. Some of these people will remain in their family houses, some will seek to downsize from family homes to places with easier access (e.g. the absence of steps or stairs), and some will seek to move to aged-care facilities. The suggestion (5.7.3) that shop-top housing could suit an aging cohort must be qualified by stating that this requires purpose-designed buildings (with level entries, and fitted with lifts for people who wish to live on top of shops).

Is there a need to provide additional housing in Hunters Hill?

As discussed in Section 4.3.4, DPIE figures suggest an additional 75 dwellings are required to meet projected population growth by 2041. There seems also a need for greater diversity of housing, which currently is not being satisfied under Complying Development in that part of Hunters Hill not under Council's control.

The North District Plan of the Greater Sydney Commission (Section 4.3.5 and Table 5 of the DPIEs 'Hunters Hill data information pack' states that Hunters Hill is on target to meet its requirements (projected 159 dwellings of a target range 150 - 200).

With these relatively small targets, the projected increase in housing will be catered for by developments already approved in Gladesville, and possible residential development of the Gladesville Hospital site - although this potential must be approached carefully to ensure the preservation of this location for future generations as well.

There is certainly no justification for the Actions envisaged in 6.2-Housing Priority 1, such as to *'Focus mid-rise residential development on Gladesville Town Centre, Hunter's Hill Village and Boronia Park'*. Council should consider how it can preserve the character of Hunters Hill while enabling creative housing solutions - such as proposals to convert mansions into apartments that the suburb saw in the 1960s and 1970s that has left a legacy of beautiful heritage buildings and gardens but with increased housing capacity.

There still remains the requirement to provide greater diversity of housing, which will not necessarily eventuate under commercial conditions. Should Council decide to close permanently its Works Depot, it should open discussion of all possible uses for this site. Should it be converted to public open space, which is short in this part of the peninsular? Or rezoned for development as long-term affordable rental housing? This would provide a rare opportunity in an LGA described in the Strategy as having a *'highly constrained, unaffordable property market'*. Of course, this would reduce the sale price, and would require a watertight guarantee against it later being reclassified and resold into the general housing market, so creating a windfall profit for the then-current owners.

Section 6: Housing Strategy Implementation

Priority 1: Plan for additional housing in appropriate locations

The document equates Priority 1 to *'Alignment with Hunter's Hill LSPS Goals and Planning Priorities'*, which are recognised as being to meet community needs and aspirations, stating that the Strategy should:

- 'Provide services and facilities within Hunter's Hill to meet community needs and aspirations of the community', and
- 'Provide land use planning framework to support community needs and aspirations'

But there is no reference to having determined the needs and aspirations of the people likely to live in the additional housing proposed by this Strategy. While their needs and aspirations could well include *'a good level of residential amenity and connectivity via ready access to transport, shops, services and community facilities'*, perhaps they also have other concerns that are incompatible with being crammed into high density, multi-storey living in an over-developed Hunters Hill Village, above a new supermarket in Gladesville, or on top of a shop in Boronia Park.

A major failing of this Strategy is that it gives little attention to that portion of Hunters Hill that lies east of the overpass. The nominal reason for this is concern about traffic congestion on the route leading down the peninsula, but this is purely peak-hour congestion, which is shared by Ryde Rd and Victoria Rd (see Section 4.4.4). Perhaps the underlying reason is that summarised by the statement that *'Council is committed to maintaining the character, amenity and high environmental values that apply to the Hunter's Hill peninsula, whilst allowing for some additional capacity in appropriate locations'*. The Hunters Hill Trust acknowledges the special character of our part of Sydney but this is not limited to the peninsular. All of our through roads suffer peak hour traffic congestion, which can be reduced by enhancing other modes of transport such as cycling, walking and public transport. In summary, 'character, amenity and environmental values' are not confined to the peninsula.

Priority 2: Support housing diversity and housing affordability

Quoting the LSPS Goals and Planning Priorities, these aims are stated to be to:

- 'Provide services and facilities within Hunter's Hill to meet community needs and aspirations of the community now and by 2040'; and
- 'Provide a caring and safe community where healthy activities are encouraged and promote a strong sense of community and connection among residents by 2040'

But the dLHS fails to identify the community's needs and aspirations regarding housing diversity and affordability, and simply assumes everyone (including *'shrinking household types, young families, those who wish to downsize'*) wish to live in *'one, two- and three-bedroom apartments'*. Surely *'diversity'* means more than everyone living in an apartment; this may coincide with the State government's current view, but is one we are not obliged to accept.

It is difficult to see how Action 2.5 (*'Work with neighbouring Councils ...'*) could improve affordable housing within Hunters Hill: it sounds more like seeking to transfer our responsibility to our neighbours.

Action 2.9 suggests 'a sensitive upgrade of existing housing stock and a consistent approach to assessing proposals to older apartment stock and some older residential buildings', but doesn't explain how this might increase diversity and/or affordability without reducing quality or degrading the environment. It is acknowledged, however, that older apartment stock is often better designed and built for amenity and preservation of green space than new apartments that just seek to maximise developer returns against the land acquisition costs.

Priority 3: Protect significant environmental values through sustainable developments and design quality of new developments

The aims to achieve sustainable development and design quality are stated to be to:

- Create great places and streetscapes for people.
- Facilitate and undertake sustainable practices.

The means to achieve these admirable but vague aims include to:

- *'investigate a design excellence bonus'; this is important, and could be combined with an Environmental Excellence bonus. But there would need to be a mechanism to provide some certainty that the measures permitted by the bonus were permanent.*
- *'locate future housing away from environmental risk areas', yet the proposed development of and around Figtree Park inevitably would degrade environmental values here through removal of tree canopy and green spaces which water absorption rather than run-off.*
- *'address transport and parking'; intensive development inevitably leads to increasing traffic congestion, so should be kept away from areas such as Figtree Park, and Boronia Park shopping area, both of which are already currently congested centres is with limited provision for parking.*

Priority 4: Encourage compatibility of new housing with existing local character and heritage

The aim of this Priority is stated to be to *'Maintain and enhance the natural and built heritage character of Hunter's Hill'*, which, in turn is stated to be *'a leafy established area with early garden suburb features and areas of urban bushland and scenic foreshore stretches that are highly valued by the community.'*

Such an aim is welcomed but shifts the burden of development sought by Council through the proposals for:

- 'mid-rise apartment living' in Gladesville, or
- 'buildings providing a 2-3 storey presentation to street in the Hunters Hill Village, or
- '2-3 storey buildings in a strip shopping centre' in Boronia Park

Protecting environmental values

While stated as an aim, no specific mechanisms are proposed to protect environmental values while increasing housing density. The reality of the euphemism *'renewal of existing housing stock'* is the 'knock-down-rebuild' pattern that, under the heavy touch of Complying Development, currently is blighting all but the Conservation Areas of Hunters Hill (and even here heavy-handed change is being imposed). Inevitably, such *'renewal'* is accompanied by the loss of open space and trees. Under complying development only 20% of the site area (as opposed to the original garden suburb rate of 50%) need be available to grow plants of any type, and replacing single-storey with multistorey structures exacerbates the impact on 'environmental values'.

Conclusion

- The document explains that the current rates of increase in housing will meet the requirements of both the Department of Planning, Industry and Environment (DPIE), and the Greater Sydney Commission, (GSC),

- The document contains no evidence that the community seeks increases beyond these,
- Traffic congestion and parking are already recognised as problems in our tightly constrained municipality, yet the proposals would intensify these problems,
- The only bodies likely to benefit from the proposed changes would be developers, and those (most of whom are not residents) who would benefit from demolition and construction.
- Council should amend this proposal to meet only the minimum requirements of the DPIE.