

Dr Deborah Dearing  
North District Commissioner  
Greater Sydney Commission  
Draft District Plans  
PO Box 257,  
Parramatta NSW 2124

March 28 2017

Dear Dr Dearing,

RE: Draft North District Plan 2017

Thank you for giving us the opportunity to provide our comments on the draft North District Plan as proposed by the Greater Sydney Commission (GSC).

In terms of preliminary comments, we have 5 major concerns with the Plan prior to our detailed recommendations:

1. Throughout the North District plan there is an apparent lack of knowledge and understanding of Ku-ring-gai area. Many broad and undefined statements pepper the discussion on housing, heritage and environment within this document that highlight a lack of investigation and experience of the area. Hence undermining the intent of the plan.
2. The lack of co-ordination in terms of planning policy whereby this GSC planning and consultation process is being undermined by the Department of Planning and Environment, with the reduced protections within the recent NSW Biodiversity legislation amendments, and now the concurrent proposed changes:
  - a. The Environmental Planning and Assessment Act 1979 and review of the its regulations;
  - b. The proposed introduction of the ill-conceived Medium Density legislation expanding the Exempt and Complying Development Code;
  - c. The draft Child Care SEPP, Draft Coastal Management SEPP and infrastructure SEPP expansions

The expansion of complying developments to meet housing targets is a key concern that will have detrimental impacts on the character of Ku-ring-gai's built and natural environment.

3. The GSC and NSW Planning vision Towards our Greater Sydney 2056 outlined in Chapter 2 of the document, based on the Plan for a Growing Sydney, is not the vision of Sydney that FOKE believes is equitable or will deliver a sustainable, productive and most importantly liveable city. As the basis of this document, we do not believe this has been either rigorously developed or alternative management sought.

4. We support the attempt to cover the essential areas of Productivity, Liveability and Sustainability for a growing Sydney. However, the draft North District plan is a lengthy and broadly written document, incorporating essentially 'motherhood' statements. It lacks clarity in terms of clear objectives and priorities. There is considerable lack of detail how priorities are to be achieved and lacking detail on resources, with the document essentially 'a plan to make a plan'.
5. Though many of the objectives (if the objectives can be believed to be sincere and achievable) are supported as being important to a liveable, productive and sustainable Sydney, there remains little case for a 'one-size fits all' approach, either across Sydney or within the North District itself. The local Councils and community are best placed to determine how the development of an area can proceed while protecting and enhancing its character, heritage and amenity.

**FOKE requests that more detailed plans and studies (e.g. environment, heritage, traffic, parking and infrastructure studies) for the North District need to be viewed prior to any finalisation of the plan in order to see its impact, but also to ensure there are no unintended consequences of unfettered growth.**

Without this detail, this document currently appears to be 168 pages of justification for increasing housing supply and predominantly a land use plan for economic objectives.

#### **Our (NSW Planning) vision Towards our Greater Sydney 2056 (Chapter 2)**

**Both the 'A Plan for Growing Sydney' and the GSC District Plans rely on population projections that deliver a Sydney of 6.4 million by 2036.** This is a dramatic increase of 2.7 million over 20 years. However, the majority of this increase, 1.7 million, is a result of net overseas migration as highlighted by the Australian Bureau of Statistics (Outlook for net overseas migration 2016) and a 2016 report from the Planning Institute of Australia (Megatrends shaping our Future). This latter report concluded "Overseas migration continues to be the biggest contributor to population growth".

This begs the question where is the Federal and State Government's decentralisation policies? And why would any sensible government encourage the majority of its migration into its largest city?

***This is not the current community or resident vision!*** High growth rates are resource intensive, difficult to manage and can lead to significant long term environmental impacts. In the past, these have included a higher proportion of defective buildings, lags in required new infrastructure with traffic congestion increasing and damage to bushland and watercourses from greater urban stormwater run-off.

The current proposed annual growth rates for Sydney of around 1.6% are too high and need to be reduced to the more manageable levels based on the previous 3 decades of less than 1%. Critically, the Mercer World's Most Liveable Cities ranking indicates that beyond a population of around 6 million liveability declines.

***The current vision is one of continual and unfettered growth.*** The community is meant to define desired goals through a strategic approach of 'where we want the city to be in the future'. However, in practice this has degenerated into a mechanism for forcing excessive development into areas that neither want it or can support it. Where are the environmental and infrastructure studies to assess whether or not this Plan will be ecologically sustainable?

The main issues that are relevant to residents of Ku-ring-gai are:

1. Housing targets – 5 year

2. Infrastructure improvements (not addressed aside from known plans)
3. Urban Renewal
4. Medium Density Infill development
5. Affordable housing and affordable rental housing targets
6. Protect and conserve our bushlands, parks, reserves, threatened urban forests and waterways
7. Heritage conservation and improved definition
8. Sympathetic development (referred to under Design-led planning principles)

### **Productivity priorities and actions (Chapter 3)**

The proposed priorities and actions for a productive North District focus on the District's major centres as generators of jobs growth and diversity. These objectives aim to realise opportunities to leverage health, education and knowledge clusters and prioritise investment and detailed land use planning around the Northern Beaches Hospital, St. Leonards and Macquarie Park, while investment in transport will provide better access to a greater choice of jobs closer to where people live.

FOKE supports the *Productivity Priority 1; Protect and support employment lands and urban services land*. Ku-ring-gai has little remaining land of this type and with ongoing pressure for housing capacity, the provision of adequate urban services is essential for existing and future populations. In addition, the plan should also acknowledge employment role of health and education sectors within the District, particularly the private sector, which are often outside of strategic and district centres, such as Wahroonga's Seventh Day Adventist Hospital.

### **Liveability priorities and actions (Chapter 4)**

#### **4.3 Improve Housing Choice**

***This section is all about increasing capacity to meet targets.*** The first action under Prepare Local Housing Strategies by Councils focus' the majority of considerations about increased supply, plus increases in affordable housing, and infrastructure considerations.

Across the North District the 5-year housing target is 25,950 new dwellings based on the Department of Planning's expectation of population growth. Ku-ring-gai's share is 4,000. The 20-year target for the North District is a high 97,000 new homes based on current projection models.

These targets do not take into account the 9669 new dwellings already approved in Ku-ring-gai over the past 10 years, with nearly 7000 already constructed and with 2000 new units still currently under construction.

The expectation is that increases in housing supply will increase affordability. However, as shown around the world, affordability is not such a simple equation. Many factors affect affordability that must be tackled at a State and Commonwealth level. These include foreign investment rules, tax advantages for investment, high rise buildings increasing local area prices.

#### **Priority 1: Deliver North District's Five Year Housing Targets**

- 1. Accelerate housing supply across Greater Sydney.** This priority is at odds with the following directives on good design, reflecting character of place and good quality construction. ***Until these improved construction and design rules are included as mandatory requirements there is little expectation of improved quality of supply that is sympathetic to the character of an area.***

The plan stresses the importance of addressing pent up demand that has resulted from past under-supply. This is NOT the case in Ku-ring-gai as it has over-supplied in terms of past targets.

**2. Accelerate Urban Renewal across greater Sydney:** This specifically targets the North District and will most affect Ku-ring-gai.

- This encompasses not only increased apartments, but also reducing lots sizes and increasing a diversity of housing choice such as terraces, townhouses and small blocks of flats across R2 residential zones, as highlighted in the Draft Medium Density Code on public exhibition in 2016. This new Code aims to significantly widen the areas of complying development across areas where predominantly detached dwellings are the norm.
- To date complying development has led to incongruous and ugly buildings, often of poor quality. It should not play such a major part in bringing increased housing choice into Ku-ring-gai's villages.
- Issues for consideration as outlined in this section, are basically part of the LEP and zoning process that should remain with Councils, not an overriding government body that has little understanding of the local area. These are stated as:
  - Consideration of heritage and cultural elements, visual impacts, natural elements such as flooding, special land uses and other environmental constraints.
  - Consideration of local features such as topography, lot sizes, strata ownership and the transition between the potential area and existing nearby areas.
  - Delivery considerations such as staging, enabling infrastructure, upgrades or expansions of social infrastructure such as local schools, open space and community facilities.

**Recommendation/Comment:** It is recommended that Council zoning should dictate areas suitable for increased density. It is essential to retain the character of an area, its heritage, tall tree landscape, sense of place and cohesive community. These are all aspects strongly espoused within this GSC plan as essential to a healthy and liveable city. These essential elements should not be undermined by a one-size fits all approach that increased complying developments will deliver.

### **Medium Density Infill Development**

**This will have the greatest future impact in the Ku-ring-gai area, especially as this is the main tool to deliver the North District housing targets within established areas.** As stated in the North District plan "Medium density housing is ideally located in transition areas between urban renewal precincts and existing suburbs, particularly around local centres and within the one to five-kilometre catchment of regional transport where links for walking and cycling help promote a healthy lifestyle."

A 5-kilometre catchment area from a railway or major bus routes would include all of Ku-ring-gai, and most of the North Shore.

The GSC document relies heavily on the Draft Medium Density Housing Code of complying developments, yet to be finalised, as a means of allowing greater development through residential areas. Future medium density in these areas is likely to be fast tracked by developers using this proposed Complying Medium Density Housing Code. Provided prescribed standards are met this could double building density without the need for Council, community or neighbour consent.

Low density residential housing is by far the dominant residential land use in Sydney and the North District. Allowing complying medium density in these areas, would have the potential to significantly change their character and would create public uncertainty as to the extent and concentration of medium density.

It would also undermine orderly strategic planning and Councils' capacity to plan for the population increase and required infrastructure. The subdivision pattern, including lot sizes, is instrumental in

determining the landscape and urban character of an area. Any changes to lot size through the recommended Torrens Title subdivision within this Draft Medium Density Code can have a significant effect over time on that character.

***The critical aspect of the draft Medium Density Code for complying development is that it is NOT limited to areas zoned for medium density but is intended to apply to R2 zoned residential areas where dual occupancy or multi-dwelling is permissible. The concern is that these areas are expanded in future LEPs. Only a few exemptions remain, such as Heritage Conservation Areas, bushfire prone and sensitive environmental sites.***

**Recommendation/Comment:** We strongly oppose application of any complying medium density developments in any Residential Zone other than those already zoned as Medium Density R3. The cumulative effects of this type of widespread medium density development can significantly affect the character and amenity of an area as well as stretching resources for childcare, schools, transport and utilities infrastructure.

The inclusion of complying medium density development as per the Draft Medium Density Code is contrary to the priorities within this document under section 4.6 Create great places in the North District and 4.7 Foster cohesive communities in the North District.

FOKE recommends the removal of all references to the Medium Density Housing Code from the North District plan.

#### **4.4 Improve Housing Diversity and Affordability**

“Due to planning context and recent economic conditions there has been significant supply of apartments in the North District and this is expected to continue. This provides transitional housing for seniors and more affordable homes for young people. However, they do not supply the full range greater diversity.”

Statements within the report such as “A recent review of the Department of Planning and Environment’s *Apartment Design Guidelines* provides consistent planning and design standards for apartments across NSW” show a either a lack of research or completely inadequate quality standards. Westpac CEO Brian Hartzler stated on March 8, 2017 before the House Economics Committee Review that in many instances Chinese buyers were “struggling” to dispose of their apartments as local buyers rejected these lower quality apartments in favour of higher quality developments. This is a sentiment on quality that many Sydney residents endorse.

The North District Plan states it wants “innovative responses to feasibility barriers, particularly in areas where demand for smaller homes is combined with low floor space ratios and/or mostly detached dwellings, creating a barrier to building medium density housing.” This however defines the character, its attractiveness to residents and the benefits of a strong neighbourhood community and support. The obstacles and barriers mentioned throughout the report relate to Council’s approval and exhibition system for neighbours and community comment. By removing these avenues for community input at the point of development, rather than at a higher strategic plan level, will be detrimental to the development of a cohesive community (Priority 4.7), as well as changing the character of an area and its current standards of liveability (Priority 4.2).

**Recommendation/Comment:** The North District research states that residents rate their area as a great family-friendly and safe place to live. Fast-tracking high levels of complying medium density development would be detrimental to the character of Ku-ring-gai and the North District.

We totally support the introduction of a more diverse housing stock to apartments across areas zoned for medium density. However, these need to be delivered in a manner that meets the area’s heritage and character, infrastructure, transport, amenities and community needs.

## **Deliver affordable housing and affordable rental housing**

Both very important objectives, however again it notes an 'inconsistent' approach across Councils. As long as targets are being met within a fair and equitable approach for all stakeholders, why is inconsistency a problem? The character, typography, built and natural environment of all our suburbs differ substantially. This should be something to be celebrated as it is in other large cities across the world, rather than removed as an obstacle!

The District Plan is clear on the requirement to provide affordable housing within all Council areas, particularly where there are transport networks and readily available access to service facilities. Whilst the intent is supported, the exclusion of the 'moderate' income households (only including 'very low' and 'low' income households as eligible) for affordable housing provision is not supported as this 'moderate' group includes the majority of the key-workers that support the local employment base.

**Recommendation/comment:** A one-size fit all approach across a Sydney with such a diverse heritage, with a harbour that changed the way our city developed should never be the objective. Our local government areas should continue to build on their strengths and history, with development that is integrated and sympathetic.

Currently, smaller blocks of flats that were available as affordable units for sale or rental are being demolished across Ku-ring-gai in favour of expensive high rise apartments. This issue needs improved management and a longer-term approach to ensure this removal of existing affordable housing does not continue.

## **4.6 Create Great Places in the North District**

We totally agree with the statement, "Improving liveability means putting people at the heart of planning for great places. This means recognising, respecting and building on the valued characteristics of individual neighbourhoods while maximising the improvements that come with growth and change."

It proceeds to state "Enhancing the great places in the North District requires protecting and, where possible, enhancing these highly-valued liveability characteristics, and managing growth to create healthy, well-designed, safe and inclusive places that encourage economic and social activity, vibrancy and community spirit. "

**Recommendation/Comment:** In the demography and research supporting this document, the North District is already seen to deliver all these aspects of a healthy, well-designed, safe and inclusive area, that supports economic and social activity, is inclusive, cohesive and with great community spirit. Basically, any changes must be maintained with the current regime of LEPs, allowing for community and resident comment to ensure what is already working well is not reduced or destroyed.

### **4.6.1 Provide Design-led planning**

Though the objectives of improved design and urban architecture (Draft Policy on Urban Design and Architecture for Better Places) are supported, the community has been burned and has little confidence in NSW Planning, PAC's decisions and complying developments to deliver the elevated objectives of these principles. The experience of enforced housing targets, private certifiers and a Planning Assessment Commission which in over 95% of cases finds in favour of the developer, has led to numerous ugly, poor quality developments which conflict with the local character in both bulk, lack of graduation to surrounding buildings and visual impact, while compromising amenity and the environment for its own tenants.

Within this section is a recommended **Draft Policy on Urban Design and Architecture for Better Places**. This should be evaluated based on its success to date based on fast-tracking development without due consideration of local factors and forcing developments of poor design and quality against Council and community wishes.

**Seven Principles of Urban Design and Architecture for Better Places vs real world Ku-ring-gai experience.**

<p><b>1: Contextual, local and of its place.</b></p>	<p>The urban environment is where most of us live, work and recreate. Places should be designed to be integral with local people and cultures and connected to their landscape and setting. In this way, a place will be 'of its location' - distinctive, resonant and engaging.</p>	<p><b>FAIL</b> As oversize and incongruous developments have littered Ku-ring-gai. Streetscapes affected with massive clearing of tree canopy and loss of open spaces, community areas and parks. <b>Good design should respect the heritage and character of the place!</b></p>
<p><b>2: Sustainable, efficient and durable.</b></p>	<p>Cities, towns and the infrastructure they require have both a positive and negative impact on environmental quality and climate change. An urban area should be designed to be accessible and compact; to minimise consumption of energy, water and natural resources; and to avoid detrimental impacts on natural systems. It should be designed to respond and adapt to changes over time.</p>	<p><b>FAIL</b> Currently many new apartment buildings of poor quality that will deteriorate quickly, inappropriately situated and with reductions in trees and vegetation that would have assisted in minimising heat effects.</p>
<p><b>3: Equitable, inclusive and diverse.</b></p>	<p>The city represents the coming together of the full spectrum of society in a mutually beneficial arrangement. Cities and towns must accommodate and provide access to opportunities for all. Urban design should provide equitable access to housing, employment, public transport, public space and social opportunities.</p>	<p><b>FAIL</b> Many apartment and oversized developments have been built without due equitable consideration of their neighbours. They have crowded out existing detached dwellings and forced existing residents to sell.</p>
<p><b>4: Enjoyable, safe and comfortable.</b></p>	<p>How people experience cities has a daily impact on people's lives, and investment in development and infrastructure can have</p>	<p><b>FAIL</b> As per above</p>

	<p>an impact for decades and generations. Urban design should be people focused, providing environments that are user-friendly, enjoyable, accessible and dignified.</p>	
<p><b>5: Functional, responsive and fit for purpose</b></p>	<p>As the setting for our daily lives, the urban environment must work well for a wide range of purposes. Urban design can influence the functionality and workability of urban areas permanently, and so design quality at the outset is essential.</p>	<p><b>FAIL</b></p> <p>As above. Little design quality evidenced. Poor construction of many apartment buildings leading to aggravated tenants.</p>
<p><b>6: Value-creating and cost effective.</b></p>	<p>Substantial investment goes into the urban environment and infrastructure from a range of sources. Well-designed urban places have the potential to be highly cost effective over the long term, creating ongoing and increasing value for all.</p>	<p><b>FAIL</b></p> <p>Developer driven apartment buildings have done nothing to reduce home prices, and can be seen to have increased them.</p> <p>The one urban policy that the community has seen has been the push for higher density, which forms the basis of this document. However, there is a plethora of world-wide evidence that shows that high-density policies result in stifling traffic congestion, longer travel times to work, overloaded infrastructure, environmental unsustainability, unaffordable housing, lack of housing choice and destruction of heritage, all of which we now see is increasingly plaguing Sydneysiders.</p>
<p><b>7: Distinctive, visually interesting and appealing.</b></p>	<p>For most people the urban environment is where we live our daily lives. The design of the city or precinct is fundamental to how it looks, feels and works for people. <b>Poor design has a lasting, negative impact</b>, while good design provides ongoing benefits for all.</p>	<p><b>FAIL</b></p> <p>As above. Yes we all know about the lasting effects of poor design and this has been what has been foisted on the people of Sydney for the past 5 + years.</p>



**Recommendation/Comment:** Design and planning that meets the requirements of place, character, quality, heritage and environmental protection should remain with the local Council. As mentioned earlier, Sydney is too diverse to apply a one-size State level approach to achieve good outcomes at a local level.

Ensure that local planning incorporates clear and enforceable design principles via the Council development assessment process. Remove the use of PAC in finalising approvals for the North District as PAC has historically sided with the developer over Council and community objections, leading to developments that in scale and character do not meet local planning design requirements.

#### **4.6.2 Plan for Safe and Healthy Places**

As this report states, “healthy built environments can help prevent physical and mental health problems. This is achieved through the provision of functional well connected streets and public spaces in neighbourhoods that fulfil the services and social needs of residents.”

One glaring omission to this safe and healthy objective, which we in the North District enjoy and do not take for granted, is the impact of increased density in terms of overcrowding, increased noise and the higher levels of stress that this will create.

It is also essential that higher density does not lead to higher crime rates that would affect the safety of our suburbs, as evidenced by many large international cities.

As stated in ‘The Consequences of Living in High-Rise Buildings’, by Robert Gifford, Architectural Science Review, March 2007. “However, moderators aside, the literature suggests that high-rises are less satisfactory than other housing forms for most people, that they are not optimal for children, that social relations are more impersonal and helping behaviour is less than in other housing forms, that crime and fear of crime are greater, and that they may independently account for some suicides.”

**Recommendation/Comment:** However, Ku-ring-gai has, over the past 2 years, lost 26 sites that were either public parks or community spaces to be rezoned as operational intended for high-rise development. Similarly, the NSW Government’s Crown Lands Act allows further intrusion into public spaces for rezoning. These admirable statements do not support the reality of what is a loss of public spaces within Ku-ring-gai. High-rise must be limited as the main development option for Ku-ring-gai with more medium to low rise individual housing supported.

#### **4.7 Foster cohesive communities in the North District.**

The North District plan states clearly how well the North District is regarded by residents. That residents value our areas, villages, local communities and our natural environment.

We completely support the statement that ‘We can enhance social cohesion and achieve this by protecting the heritage and local identity of the many unique neighbourhoods across the district.’

**Recommendation/Comment:** Guidance to the GSC on the North District Plan. Do not tamper with something that is working so well. Protect it!

##### **4.7.1 Conserve and enhance environmental heritage, including Aboriginal, European and natural**

The Ku-ring-gai community is very proud of our heritage built environment and have seen too many grand examples destroyed to build new dwellings and apartments. These are now lost forever and

the history of the development of the north shore of Sydney is leaving a poorer legacy for future generations.

Our natural environmental heritage is no less important as Ku-ring-gai retains one of the last urban forests in Sydney, Sheldon Forest. This plus the number of endangered areas of the Blue Gum High Forest, the Sydney Turpentine-Ironbark Forest, Swamp Oak Floodplain Forest, Duffy's Forest, Coastal Upland Swamp, Estuarine Saltmarsh. We are also very protective of the habitat within these areas as well as those of the three National Parks that border three sides of Ku-ring-gai.

"This draft District Plan recognises that development must be more than sympathetic to the District's heritage – it must enhance it. Heritage offers a point of difference that fosters connected communities and local vitality and planning should look at opportunities to adapt character and heritage buildings to new uses in a way that interprets heritage and history to maintain pride of place through the development process.

Statements such as these miss that the streetscapes are essential heritage areas, incorporating housing stock and individual gardens that make up our 'garden suburb', not just the larger heritage buildings. There is an apparent lack of local knowledge of the area.

**Recommendation/Comment:** We agree that the 'Relevant planning authorities need to identify, assess, manage and protect the heritage which underpins the community's pride of place.' However, these need to be local environmental officers as it appears throughout the document that there is little understanding of the heritage, built and natural environment of Ku-ring-gai that requires protection.

Additionally, the description of what is heritage is very narrow. The district plan is an opportunity to recognise and celebrate our district's distinctive heritage. An expanded definition and description of the North District's heritage should include inter-war and post-war architecture, including architecturally significant items such as Rose Seidler House among others.

#### **4.7.3 Create opportunities for more recreation and community facilities**

**Recommendation/Comment:** As mentioned earlier we have potentially lost 26 community facilities and open spaces that have been reclassified as operational sites for sale and or development. Ku-ring-gai with its increasing population urgently requires more facilities for recreation and community services, not only to replace what has been lost, but to allow for improved interaction and social cohesion across all age groups.

### **Sustainability priorities and actions (Chapter 5)**

#### **5.1 The Environment**

We fully support the GSC statement that "a sustainable city protects and enhances its natural environment, integrating its bushland, open spaces, waterways and vegetation into the planning for how it will grow and build its resilience and efficiency".

As mentioned earlier there are many unique and sensitive flora and fauna in Ku-ring-gai that must be protected and conserved.

As stated in this report "The importance of the environment to the residents of the North District is reflected in recent research, which showed that North District residents rated the environment more highly as an issue compared to residents of other districts in Greater Sydney."

Conserving our Environmental Heritage is a priority for Ku-ring-gai, yet the plan wrongly assumes that The Heritage Act (1977) and National Parks Act (1974) are sufficient.

**Recommendation/Comment:** It must be an overriding priority of the North District plan that our natural environment and its significance to not only Sydney, but also NSW, must be protected and conserved. This environmental policy must have a greater priority than housing capacity across all endangered and sensitive areas and their surrounds.

There is an urgent need for an update of environmental and heritage studies within Ku-ring-gai to identify and reinforce what should be protected, as existing protections are limited and have been broken down over the implementation of past and current LEPs, by the State Government watering down planning legislation. Details on each area of natural value need to be detailed and gazetted.

Strengthen protections as mandatory, not just as a consideration in terms of proposed developments or increased recreational activity. Local Councils need to be given greater statutory authority to protect the natural and built environment, when assessing small, medium and large scale developments.

## 5.5 Protecting and Enhancing biodiversity

As stated in the Plan “The North District is recognised as having a rich natural environment, supporting biodiversity. For the North District to be sustainable, we need to protect and enhance biodiversity and the landscapes that underpin our social and economic wellbeing.

Established urban areas in the North District contain areas of bushland that are important for biodiversity, as well as for their contribution to the visual landscape, waterway health and other environmental processes. We will examine opportunities to strengthen the protection of bushland in urban areas as part of the review of *A Plan for Growing Sydney* in 2017.”

These statements are inconsistent with the NSW Biodiversity Conservation legislation passed in 2016 which reduces protections across NSW.

‘Biodiversity offset schemes’ which this plan applauds that are included in the 2016 Biodiversity Conservation Bill are not supported as they have not been effective protection mechanisms in the past. Offsets allow developers to trade off their environmental responsibilities with limited benefits to the environment. There is no equitable model for recovering the cost of biodiversity impacts from urban growth and development. The loss of sensitive and unique sites within Ku-ring-gai cannot be replaced. This approach may be of use in some greenfield developments outside of the North District, however no areas remain in Ku-ring-gai that can be re-instated elsewhere within the LGA.

**Recommendation:** Within a strategic conservation plan there must be site-by-site evaluation, not just a strategic plan. Again, we see a one size fits all approach to Greater Sydney planning that is not supported by individual communities and does not return the best liveability, enhancement and protection results for both current and future generations.

The Plan objective to facilitate urban growth and development in line with *A Plan for Growing Sydney* and this draft District Plan should be removed from any a strategic conservation plan. Facilitating urban development in areas to be conserved and protected is nonsensical.

‘Biodiversity offset schemes’ which this plan applauds that are included in the 2016 Biodiversity Act are not supported as they have not been effective protection mechanisms in the past. Offsets allow developers to trade off their environmental responsibilities with limited benefits to the environment. This needs to be removed and replaced with effective protections.

## 5.6 Delivering Sydney's Green Grid

As an objective, this GSC plans that it has “developed a vision for Sydney's Green Grid with an appreciation of Greater Sydney's landscape and recognition of the diversity of elements and connections, including the Blue Grid of Sydney's beaches, estuaries and waterways, its variety of parks and open spaces and connections to bushland, from local pockets of native vegetation to Sydney Harbour.”

As Ku-ring-gai has for decades claimed the title of the Green Heart of Sydney, these are essential priorities for our Council land use zones.

**Recommendation/Comment:** Though there is no detail provided on what is included we support the idea of a Green Grid across and through Sydney, not just on its outskirts. Similarly, we support tree canopy cover being protected and extended in established urban areas. It is essential for a liveable and sustainable city that will require efficient ways to minimise heat retention from an increasingly built cityscape.

The community needs to see the detail of the Green Grid as it applies to the North District to ensure existing bushlands, parks, reserves and waterways are included, and where new ones will be located to support the priority of a healthy and active lifestyle for an increasing population.

Whilst the Plan addresses biodiversity protection within the background text, the objectives and priorities fail to adequately clarify this desired outcome. There is a need for Sydney's Green Grid objectives to address the protection and conservation of biodiversity.

The Plan fails to clearly articulate between the types of recreational activities and access within the Green Grid and needs to further distinguish between provision of biodiversity connectivity as opposed to connectivity for recreational use. In seeking to increase recreational opportunities, it is imperative that biodiversity values within High Environmental Value area are protected.

Blue and green grid outcomes should feature more strongly in connection with active transport, liveability and environmental outcomes.

## 5.8 Creating an efficient North District

### 5.8.2 Energy and Water

There is a real opportunity for the North District Plan to adopt the principles of a Water Sensitive City and draw on the expertise of the Cooperative Research Centre (CRC) for Water Sensitive Cities to enable Greater Sydney to transition to a Water Sensitive City. This would represent best practice water management.

FOKE supports the NSW target of net zero carbon emissions by 2050. FOKE also supports embedding the NSW Climate Change Policy Framework into local planning decisions. Both the North District Plan and NSW Climate Change Policy framework could be significantly strengthened, however, to reflect the recommendations of introducing a binding emissions budget for Greater Sydney that limits cumulative emissions consistent with the aim of limiting warming to less than 2 degrees Celsius inclusive of a set of interim emissions reduction targets for Greater Sydney.

The North District Plan should be strengthened by the introduction of a renewable energy target, to ensure that there is sufficient certainty for renewable energy development to continue in Greater Sydney, congruent with science based emission reduction targets.

As we highlighted earlier in our submission we await more detailed plans and studies for the North District prior to any finalisation of the plan in order to see its impact but also to ensure there are no unintended consequences.

We hope that the Greater Sydney Commission will respond positively to community submissions and make necessary changes to the North District Plan. Community groups were assured by the Chief Commissioner Lucy Turnbull and CEO Sarah Hill at the Parramatta Presentation in November 2016 that the Draft Plans “are just the start of the conversation”. We wish to be part of that ongoing conversation and look forward to viewing and responding to more detailed plans in the coming months.

Yours faithfully,

Kathy Cowley  
PRESIDENT

cc The Premier, The Hon Gladys Berejiklian MP  
cc Minister for Planning, The Hon Anthony Roberts MP  
cc Ms Lucy Turnbull, Chief Commissioner, Greater Sydney Commission  
cc Mr. Jonathan O’Dea MP Member for Davidson, Parliamentary Secretary to the Premier and Treasurer  
cc Mr. Alister Henskens SC MP Member for Ku-ring-gai, Parliamentary Secretary to the Minister for Finance.  
cc The Hon. Paul Fletcher MP, Federal Member for Bradfield and Minister for Urban Infrastructure  
cc Mayor and Councillors Ku-ring-gai Council