

General Manager
Ku-ring-gai Council
818 Pacific Highway
GORDON NSW 2072

21 December 2020

Attention: Planning Department

kmc@kmc.nsw.gov.au

Dear Mr McKee

RE: Draft Ku-ring-gai Heritage Study Ref S12203

Thank you for giving us the opportunity to make a submission on the Draft Ku-ring-gai Heritage Study.

We understand the draft Ku-ring-gai Heritage Strategy is intended to measure, plan and report on heritage management in Ku-ring-gai. Moreover, that it is an important role of local government to identify, manage and protect heritage places as required by legislation, and district and local strategic plans.

Ku-ring-gai Council was one of the last council's in Metropolitan Sydney to gazette Heritage Conservation Areas (HCAs). Despite the eventual gazettal of parts of the 28 National Trust classified urban conservation areas (UCAs) recommended in 1997, areas were greatly diminished due to State Government intervention to stop the Council from proceeding in 2004. This was due to the policy of forced urban consolidation within 400 metres of the rail line.

Ku-ring-gai Council has commissioned and undertaken numerous heritage studies (as listed in the back of council's study) since 1987 however, despite the professional consultant studies and heritage consultant recommendations significant areas of what was proposed to be protected have not been given heritage classification. There are still areas of the National Trust 28 classified HCAs despite being studied in later heritage studies, subsequently recommended as HCAs, that have been denied heritage protection to allow, we believe, for future high density and medium density zoning proposals to occur e.g. Heart of Lindfield Estate, Newark Crescent and Middle Harbour Road HCA, Lindfield to name just a few areas.

Heritage protection has also become a highly political issue in the community which is not Ku-ring-gai's either short-term or long-term interests. That is why it is so important that Council continue to educate the community as to the benefits and positive merits of heritage protection and conservation.

The heritage items and areas most at risk are predominantly within 800 metres of rail stations, the early subdivision areas of Ku-ring-gai, where most of the intact contributory and heritage items are located. These areas unfortunately, are the very areas that the current State Government is wanting Council to target for additional medium and high-density unit development.

Having read the Draft Heritage Study, we generally support the objectives priorities outlined in the

2016 NATIONAL TRUST HERITAGE AWARDS HIGHLY COMMENDED
2009 NATIONAL TRUST HERITAGE AWARDS HIGHLY COMMENDED
2008 NSW GOVERNMENT HERITAGE VOLUNTEERS AWARD
2000 FOKE, WINNER, NSW HERITAGE OFFICE CULTURAL HERITAGE CONSERVATION AWARD
"HERITAGE WATCH OVER OUR PLACE OF NATIONAL SIGNIFICANCE –KU-RING-GAI"
KEEP AUSTRALIA BEAUTIFUL COUNCIL (NSW) METRO PRIDE AWARDS.

papers. We also attached the Godden McKay Logan recommendations from 2002 which are still very valid for council to follow. Being the principal heritage study undertaken over the last 20 years.

The GML Neighbourhood and Character Study 2000 recommendations stated:

“Summary:

Council has commissioned Godden Mackay Logan, Heritage Consultants, in association with Keys Young, Urban Designers and Planners, to prepare a Heritage and Neighbourhood Character Study as one of four baseline studies to inform the preparation of the Strategy.

Although initially intended as a standard Heritage Study (to be supplemented with a neighbourhood character component), the original study brief was later modified in scope, the primary objective being to inform the preparation of the Residential Development Strategy.

The brief required inter alia that a distinction be made between heritage and neighbourhood character values in order that appropriate management policies and controls could be formulated. The study process has included consultation with the local community on the parts of the Ku-ring-gai study area which they consider to have heritage value, as well as areas where there might be the potential to introduce new residential development and housing choice. In general, many members of the community stated, and the study fieldwork confirmed, that the heritage and neighbourhood character values of the study area are exceptional and therefore any new development introduced within the area must be based on and be compatible with those values.

Neighbourhood Character:

The neighbourhood character study included an analysis of the characteristics of existing neighbourhoods in order to determine those that need to be protected, enhanced and/or reinforced by new development. The prevailing pattern of residential development, which is common throughout most of the study area, is characterised by single dwelling houses addressing the street across an open-front garden, and providing a private rear garden. This pattern has enabled the landscape to and provide the most significant characteristic of Ku-ring-gai — its tree cover.

The consistency of this pattern, the abundant landscape and the relative cohesiveness of housing scale, form and style within the study areas of Ku-ring-gai make the neighbourhood special. The specific neighbourhood character areas are shown on the maps prepared for the eight suburbs along the highway/railway spine and the fifteen outlying neighbourhood centres.

Landscape Topography *is a major determinant of the landscape character of the suburbs within the study area. The pattern of alternating spurs and deep gullies on the sides of the main ridge provide a diversity of visual experiences, ranging from extensive, richly textured views to a distant horizon, to enclosed, almost intimate views where the focus is on dominant items in the foreground. In many cases, these comprise the huge, mature remnant eucalypts of the tall forests that covered this landscape prior to European settlement.*

Although the relatively flat plateaux of the ridges proved ideal for residential development, the many steep gullies and valleys were unsuitable for this, and were left alone to harbour the great stands of eucalypts. Because many of the subdivisions in the northern and western sectors occurred after the environmental movement had influenced the degree to which people valued and preserved native vegetation. It was this vegetation that became the chief historical resource of these suburbs. In other words, because the residential developments in Ku-ring-gai are relatively new, and the native vegetation relatively ancient, it is the remnant stands that have, by default, become the chief landscape heritage items. The identified landscape heritage items and key landscape features are shown on the landscape map accompanying the sections of this report which focus on the

respective study areas.

Heritage Values:

The current Heritage and Neighbourhood Character Study builds on the findings of the 1987 Heritage Study by focusing on the history and heritage of specific areas. It has found that these areas contribute to the significance of Ku-ring-gai in the following ways:

- *The spine areas contain the majority of heritage items identified in the 1987 Heritage Study. Only a small number of these items warrant reconsideration of their listing as heritage items. In cases where they do, this is mostly due to the adverse effects caused by recent subdivision and loss of curtilage for these items.*
- *Within the spine areas particularly, the study identifies the collective value of relatively intact Federation and Interwar period subdivision and development. A number of areas, both east and west of the railway line, clearly articulate the settlement pattern within this period and should be managed as conservation areas. Three of these areas (Wahroonga Heights, Warrawee and Ku-ring-gai Avenue) have long been classified as Urban Conservation Areas by the National Trust (NSW), one as early as 1978. One area, Ku-ring-gai/Womerah Avenue, is a conservation area in a draft LEP. Other areas have been more recently classified by the National Trust (NSW) as Urban Conservation Area Precincts (UCAs) in 1997.*
- *Throughout the study area, additional built and landscape elements, which provide evidence of the various themes of Ku-ring-gai's history, have been identified. These potential heritage items warrant further assessment.*
- *Within the outlying areas, the study has found evidence of post-World War II planning philosophies which sought to foster a community identity. In some cases, such as in West Pymble, these ideals were reinforced by the involvement of Council itself in the development of the neighbourhood centre and the surrounding residential subdivision.*
- *Historical research has revealed that, in addition to the use of early planning tools contained in various provisions introduced under the local Government Act of 1919, the community, through their early progress associations, played a large role in achieving the segregation of residential from other uses. Wahroonga, Warrawee and Killara retain evidence of early residents' efforts to exclude shops from residential areas east of the railway line." End of Quote.*

There are still areas in Ku-ring-gai which have heritage value which should be confirmed by Ku-ring-gai Council as Council's heritage list should not be static.

With the unfortunate requirement by the State Government to develop in and around the rail stations, Ku-ring-gai's early heritage items and gazetted HCAs and local heritage items are being adversely degraded and impacted from high density and medium density development. Heritage items are easily undermined by inappropriate and unsympathetic medium and high-rise development.

We believe the Ku-ring-gai's LEPs and DCP's should be amended to ensure adequate separation, interface and distance is maintained between proposed high density and medium density development and heritage items.

Ku-ring-gai's current LEPs allow a very blunt and unsympathetic approach to planning in and around heritage items and as a result a number of heritage listed homes and HCAs have been

unduly impacted with overbearing and unsympathetic development. Ku-ring-gai's LEPs need to be amended to ensure stricter interface, building and landscaping controls to ensure heritage items are not unduly impacted as is the case now. We believe that Council should ensure that all heritage items have adequate separation and distance from potential conflicting urban consolidation zoning.

We support the draft study's recommendations:

1. To support as a priority the fulfilling of obligations to conserve Ku-ring-gai's heritage.
2. To support the priority that council continues to use and draw on previous consultant's heritage studies.
3. To support as a priority the conservation and protection of significant mid-late 20th Century development.
4. To support the priority to review existing and identify new heritage items and HCAs.
5. To support the priority to review and refine existing DCPs and LEPs to ensure heritage items are not unduly impacted by unsympathetic or inappropriate development.
6. To support the priority to focus on areas that interface heritage items and HCAs given the potential for conflicting and unsympathetic development to potentially degrade heritage items.
7. To ensure continued and regular engagement with the Ku-ring-gai Historical Society.
8. To continue to promote and facilitate Heritage Home Grants.
9. To maintain heritage profile in Ku-ring-gai Design awards.
10. To continue to promote heritage in the wider community.
11. To participate in the annual National Trust Heritage Festival.
12. To support the priority to make interim heritage orders where appropriate.
13. To continue to support the priority to identify and correct heritage anomalies.
14. To continue to support owners of heritage properties in Ku-ring-gai.

We support and commend the Draft Heritage Study and look forward to council continuing to identify, manage and protect heritage places as required by legislation, through district and local strategic plans now and into the future, as set out in the study's recommendations.

Yours faithfully

Kathy Cowley

PRESIDENT

cc Mayor and Councillors

cc The Hon Jonathan O'Dea Member for Davidson

cc Mr Alister Henskens SC MP Member for Ku-ring-gai

cc The Hon Paul Fletcher MP Member for Bradfield