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Ku-ring-gai Council
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Attention: Will Adames

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17 December 2020

Dear Will

RE: Draft Ku-ring-gai Local Character Study

Thank you for giving us the opportunity to make a submission on the Draft Ku-ring-gai Local Character Study (KLCS) which we understand is in response to one of the key aims of the Ku-ring-gai Local Strategic Planning Statement (LSPS) called 'Planning Priority – K12'

Over the past 20 years forced high density planning policies forced by the previous State Government and subsequent gazetted LEP's have failed to '*conserve and enhance Ku-ring-gai's unique visual and landscape character*'. Neighbourhoods and streetscapes within 400 metres of six local centres – streets of Inter-War and Federation houses which heritage and neighbourhood character studies recommended conserving, have been lost to 'alien' overdevelopment. This could have been avoided with more careful and respectful planning, appropriate heritage protection, and prescriptive standards and controls to safeguard Ku-ring-gai's character. However, the State Government and development industry got its way by allowing development which many believe has detracted from Ku-ring-gai's traditional visual and landscape character. Not only have we seen a change in Ku-ring-gai's visual and landscape character and the loss of hundreds of critically endangered species of trees but the noticeable poor quality of some of the buildings that have been built!

The modernistic 'cookie cutter' 'one size fits all' development which is seen throughout the Sydney Metropolitan Area is now also represented throughout the ridgeline and transport corridor of Ku-ring-gai.

Ku-ring-gai is renowned for its architecture and of the prominent architects who have designed and built homes in this area since the railway came to Ku-ring-gai in the late 1890's. With the emergence in the last 20 years of project homes, 'McMansions' and 'cookie cutter' designed unit buildings Ku-ring-gai's heritage and prominent architectural heritage has diminished.

The destruction of local character must not continue, particularly if Ku-ring-gai Council's renowned remaining Inter-war and Federation character is to be protected into the future.

The fact that Council has recently adopted a scaled back Housing Strategy that will rely on existing capacity and controls in the current LEP's gives Ku-ring-gai a chance to reflect and review the overdevelopment of the past 20 years - development, which is described as overbearing, dominating and intrusive. Council now has an opportunity to plan more carefully for the future and to manage development more responsibly which '*conserves and enhances Ku-ring-gai's unique visual and landscape character*'.

We understand that Council's prime objective and the planning priority of the study is defined as 'Managing change and growth in a way that conserves and enhances Ku-ring-gai's unique visual and landscape character'. If that is Council's objective, then we believe that Council has started off on the wrong footing and will go down the same destructive path as the last 20 years!

Ku-ring-gai's Visual Character Study by M A Schell in 1999 (whilst in part limited in terms of the number of streets studied) and its methodology represents to us the better approach in going street by street in ground truthing as to what is actually on the ground than the very 'broad brush' and general approach taken with the latest Draft Local Character Study.

Unfortunately, the M A Schell Character Study does not appear to have been as effectively used or referred to consistently in protecting Ku-ring-gai's local character particularly when determining development applications as many of the new developments which have occurred over the last 20 years are completely "alien" to Ku-ring-gai's heritage and neighbourhood character.

The relatively new planning term "desired future character" has given planners and developers carte blanche to change local character and streetscapes so that they are today unrecognisable e.g. Bruce Avenue Killara, Lorne Avenue, Killara, Turramurra Avenue Turramurra and Victoria Street Roseville to name some examples.

The numerous consultants Heritage Studies dating back to 1987 and forward to 2013 that have been listed in the council advertised Draft Heritage Study must also inform the Draft Local Character Study as these studies have required ground truthing for their preparation and delivery to Council. Similarly, the Conacher Travers Environment Study in 2002 which was very comprehensive in outlining Ku-ring-gai's unique environmental sensitivity.

For example, the KLCS has simply ignored past heritage studies particularly in the north of the Municipality and along the ridgeline of Ku-ring-gai. The KLCS proposes a single "Heritage Core" (Draft Local Character Area 7) which is limited to only areas south of Mona Vale Road, and east of the railway corridor. There is no "Heritage Core" whatsoever north of Mona Vale Road (Pymble to Wahroonga), and there is no "Heritage Core" whatsoever west of the railway corridor (Roseville to Wahroonga). HCAs outside of this "Heritage Core" (Draft Local Character Area 7), notably in Pymble but also elsewhere, these areas have simply been ignored.

Moreover, to separate "Ku-ring-gai Ridge and Centres (Draft Local Character Area 2) area when it contains some of the earliest heritage buildings along which is the Ku-ring-gai rail corridor and rail line e.g. buildings on Pymble Hill, Hillview precinct Turramurra etc. These areas will become more susceptible through indiscriminate local land use planning and overdevelopment.

All gazetted heritage conservation areas in Ku-ring-gai need to be clearly identified on the local character map and areas of high biodiversity and critically endangered ecological communities.

We support the recommendations of the Godden Mackay Logan (GML) Neighbourhood and Character Study of 2000, information which is still of relevance today in guiding the development of new Local Character Studies. There are parts of Ku-ring-gai studied by GML and other heritage studies since 1987-2013 which still need the protection from indiscriminate future land use planning and overdevelopment.

The GML Neighbourhood and Character Study 2000 recommendations state:

“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.*

With respect to the KLCS Interactive Map that council has placed on exhibition on the website in conjunction with the exhibited study - a number of people we have spoken with are finding it very hard to navigate and needs to be reviewed in making it more practical and user friendly.

In summarising. The KLCS is, ultimately, a simplistic and superficial, one-size-fits-all approach to identifying Ku-ring-gai's local character and ignores key heritage areas identified in council studies. The KLCS sanitises and downgrades, and ultimately threatens, Ku-ring-gai's thoroughly researched and documented local character through many years of consultants studies such as the GML Neighbourhood and Character Study of 2000 which is still relevant today as well as the M A Schell Study of 1999. If adopted, the KLCS in the way it is being currently devised will facilitate further indiscriminate re-zonings for increased high-rise development and other forms of overdevelopment while weakening protection for Ku-ring-gai's heritage and documented character areas, items, and streetscapes.

We look forward to being kept updated and involved in the preparation of the KLCS.

Yours faithfully

Kathy Cowley
PRESIDENT