

The General Manager
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8 May 2020

Dear Mr McKee,

RE: Ku-ring-gai Council Draft Housing Strategy - Reference S12728

Thank you for the opportunity to review the detailed information regarding the Draft Ku-ring-gai Housing Strategy (KHS).

We are disappointed that Council has not taken into account the impacts that COVID-19 has had on ratepayers and the day to day running of Council and the public exhibition of the KHS. The fact of denying the extension of the public exhibition period or postponing it until libraries and council offices are back open shows that Council has not fully recognised or appreciated the impacts the coronavirus health crisis is having on families. Residents have not had the opportunity to attend libraries or council offices to view the 600 page document associated with the public exhibition of the KHS. Moreover, residents have not had the opportunity to speak with and directly ask questions of urban planning staff at council due to the lockdown. Any enquiries have had to be handled via indirect emails as planning staff have been operating from home during the health crisis and through the majority of the six week public exhibition period.

The KHS is described by staff as a “*high-level strategic planning document that sets a series of overarching principles to identify appropriate areas for more detailed investigation for housing*”. However, being such a significant strategic planning document, what has Council done to make the public exhibition highly visible and public? Most people we have spoken to or have subsequently heard from, since our flyer was letterboxed, had no idea that the Draft KHS is on public exhibition. Instead, Council’s consultation has been minimised and hidden rather than publicised to encourage the engagement and participation by every ratepayer in having the opportunity to have say on the KHS. The only residents directly consulted have been those that have registered to receive emails from Council, have been directly contacted by council’s consultants, or may have seen a small one paragraph advertisement in the print media.

A strategy that proposes an increase of population of at least 41.5% and 25,000 additional residents is of importance and relevance to every ratepayer in the municipality and should not have been treated in such a tokenistic manner. In the case of this public exhibition, not even the residents in the four primary centres have been notified by Council by letter. It

has been left to FOKE and volunteers to distribute a flyer to the residents of the four primary centres in informing and encouraging residents to get involved. In the case of Lindfield, 'Support Lindfield' primarily concerned with the Lindfield Hub project, has just this week sent out a notice to its email list and members. It has taken community groups weeks to evaluate the KHS in making an assessment of how it will impact the centres.

With just six months set aside for the preparation, engagement and consultation of the Draft KHS, the conclusion is that the KHS seems already pre-determined, particularly as it will be ready to send to the Minister and Department of Planning in June 2020. We are also concerned due to the tokenistic public engagement that the public exhibition is just a 'tick the box' exercise. It is even doubtful that Ku-ring-gai councillors are fully informed and understand the ramifications of the KHS as to the long-term impacts to Ku-ring-gai.

The KHS is focussed on increasing housing in four key primary centres within 800 metres of Lindfield, Gordon, Turramurra and St Ives centres, with neighbourhood centres to be studied later. A housing strategy which proposes to significantly increase population and density impacts every ratepayer in some form or another, whether it is in overcrowding schools, classrooms, playgrounds and sports fields, crowded buses and trains, congesting local traffic and parking and increasing pressure on old and ageing services such as sewerage and water. Increasing population also puts greater pressure on the use of open space, local parks and services such as public libraries, community facilities and halls. There is nothing in the KHS which provides any certainty that public infrastructure or services, new community facilities and open space and parkland etc. have been assessed, will be planned, funded or delivered to cater for the proposed significant increases in population.

The KHS is full of motherhood statements with no critical evidence-based studies to ensure that heritage, environment and neighbourhood character will be conserved and protected. Baseline Studies that were studied in preparation for the Residential Development Strategy in 2000/02 have not been reviewed or referred to, particularly in regard to the pre-existing constraints that were researched and identified in the four studies at the time. Many of the constraints are still overlooked in the KHS and have not been acted upon and taken into account 19 years later. Moreover, no new baseline studies have been undertaken by council or are assured or their funding, apart from a local character study to be conducted at a later date, which was vital to critically inform the drafting of the KHS. The only studies undertaken to inform the KHS have been a capacity and viability study, which clearly shows the KHS is only based on housing needs and not the protection of Ku-ring-gai's unique tall tree environment particularly in meeting council's and the community's important stated aims of ***'conserving and enhancing Ku-ring-gai's unique visual and landscape character'***.

Focussing 100% of the development within 800 metres of the centres will lead to significant swathes of intact Interwar and Federation homes to be demolished and replaced which are not protected within HCAs. In 1997 the National Trust (NT) studied and declared 28 Urban Conservation Areas along the length of the North Shore Railway Line from Roseville to Wahroonga. The NT classified areas were studied subsequently by Council's heritage consultants e.g. Godden McKay Logan and Perumal Murphy Alessi following the recommendations from the baseline studies in 2000/2. The majority of the NT classified HCA areas were supported for heritage protection. However, due to State Government intervention, the imposition of urban consolidation, areas formerly proposed for heritage

protection have been greatly diminished. They are now the target for more inappropriate development.

We also believe some of these still intact/relatively intact early subdivision areas have been deliberately excluded from HCAs to enable council to rezone areas for future medium and high density development. e.g. despite being recommended by several heritage experts part of the Heart of Lindfield Estate HCA has been left out of the Treatts Road HCA. These HCAs were recommended for inclusion in a HCA by the National Trust and also Godden McKay Logan and Perumal Murphy Alessi. This has resulted in significant areas of Ku-ring-gai's 28 National Trust classified HCAs being deliberately allowed to be sacrificed to high density development and not protected as heritage experts have recommended. With the latest proposal set out in the KHS , Ku-ring-gai is in danger of also losing significant areas of unprotected heritage character. Ku-ring-gai will end up with just small isolated pockets of protected heritage remaining. Ku-ring-gai was considered by the National Trust in 1997 following extensive heritage studies to have the most significant and important intact areas of Inter-War housing within the whole of Australia. The 28 classified National Trust Urban Inter-War heritage studies and subsequent recommended classified urban conservation areas (UCAs) were primarily situated within 800 metres of the railway line.

With the KHS plan to butt areas of medium and high density up to and adjacent to HCAs this will only impact the local heritage significance of the HCA but also put community pressure on council to remove HCAs altogether. Notably, this is what has happened to heritage listed properties which have been impacted by adjacent high density development e.g. 21 Lorne Avenue Killara. The heritage listed home was surrounded by R4 development and isolated, forcing the owners to lobby council to have the listing removed so the home could be incorporated into the surrounding 4-5 storey development. The KHS plans intruding into areas containing HCAs will we believe, weaken the ability of Ku-ring-gai to protect and preserve the heritage integrity of HCAs into the future. See Recommendation 7 relating to the protection of heritage in our submission.

Ku-ring-gai is already lagging at least 15 years behind in providing appropriate new infrastructure in the form of community services, sporting facilities, open space and parks to service the already significant 25,606 population increase since 2004, the start of the earlier residential development strategy (RDS). There has been no assessment nor information provided in the KHS documents as to what additional infrastructure is assessed to be needed to meet the additional proposed 25,000 person and 41.5% population increase to 2036.

There has been no assessment of additional dwellings that will be yielded in and throughout other areas of Ku-ring-gai in addition to the proposed KHS 10660 new dwellings to 2036. Ratepayers need to be informed as to what will may be yielded through State Government planning legislation, Council's LEP's and SEPP's such as SEPP Seniors Living units , boarding houses, group homes, dual occupancy developments, secondary dwellings in fire prone areas and the existing capacity yet to be taken up in local town centres commercial and business areas such Roseville, Pymble and Wahroonga. Ratepayers need to know what these additional dwellings are likely to yield over and above the 10660 new dwelling proposed to 2036.

The community were misled as to the actual proposed yield in the earlier RDS which has yielded an excess of 4000 – 6000 additional dwellings over and above the State

Government imposed target of 10,000 dwellings from 2004-2031. There needs to be accountability, full transparency and trust in the proposals in the KHS.

Since the 1900's council buildings and community facilities have been allowed by Council to run down and deteriorate to the point that many community facilities will either need replacing or major expenditure spent on the facilities to be able to be useful into the future e.g. Marian Street Theatre and Council Chambers.

Population increases impact lifestyle and living standards of residents in a variety of ways and yet the KHS provides no certainty that new infrastructure, parks, community facilities will be either funded or delivered to 2036.

FOKE submits to Council our evaluation of the documents and a number of areas for amendment prior to the acceptance or adoption of the strategy by Council.

Overall, we believe the high population increase in this Strategy of 21% on top of the existing population increase of 21% from 2006 to 2018 (LSPS) is unsustainable and has already adversely impacted and will continue to damage our environment, our heritage, our local character and amenity. This is a combined 42% population increase over 30 years.

A. The targeted dwelling numbers are not supported by either the population projections or net migration numbers.

The required new dwelling numbers are overstated by approximately 2000.

For the forecast population growth of 25,337 from 2016 to 2036, the KHS has used a 2.38 average household size to generate a new dwellings target of 10,660. This is a massive 20% reduction in the average household size for Ku-ring-gai whether one uses the 2.97 average household size from 2016 or 2.95 from 2021, as per table 27 in the Housing Needs study.

This assumption of such a reduction in household size is erroneous and the actual household size figure is more likely to remain similar to that of 2021 to 2026 at 2.92 persons per household. This would generate a new dwelling figure of 8,677.

A reduction of 1983 dwellings from that based on the KHS erroneous assumptions.

The evidence is as follows:

1. There is no trend shown in the Australian Bureau of Statistics (ABS) figures of a reduction in household size, from 2006 to 2016, based on age distribution over the prior periods.

Comparing the 2006 to 2026 age distribution to the forecast age breakdown from the KHS report for 2036, the KHS report shows a skew which is not supported by the ABS data. However, even this skew is not significant enough to assume a 20% reduction in household size.

Changes in age distribution

	2006	2011	2016	2036
0-9	12.4%	12.4%	12.4%	11.4%
10 to 19	16.5%	16.2%	15.7%	15.2%
20 to 29	9.1%	9.3%	9.4%	8.8%
30 to 39	9.3%	9.1%	10.2%	9.1%
40 to 49	16.2%	16.0%	15.1%	15.4%
50 to 59	14.2%	13.8%	13.9%	14.2%
60 to 69	9.6%	10.4%	10.0%	10.1%
70 to 79	7.0%	6.8%	7.3%	8.2%
80+	5.7%	6.0%	6.0%	7.5%
	100.0%	100.0%	100.0%	100.0%

Table compiled from ABS Census data for 2006, 2011 and 2016. 2036 figures from Table 5 of Housing Needs study

2. The KHS report presents that there are substantial increases in the older age categories. (ref HNS pg 29). However, this is due to the low original base, with the 70+ group increasing from 13% to 15% of the overall population between 2016 to 2036, and the over 60's similarly showing a minimal increase from 23% to 26% for the same period. Overall, it is evident from the above table that the dominant groups remain families with dependent children, a total of 53% for the age groups of 0-19 and 30-49 in 2016 and 51% in 2036.
3. There will be no abatement of this high proportion of family households as Ku-ring-gai remains a desirable location with many excellent schools, both public and private. Supported by the high inward migration by families both from NSW and Overseas. (Ref Section 8.2 HNS)
4. Projected structural age change as assumed in the KHS report is not supported by facts.
 - In terms of inward migration, the largest group is families with children, as per the KHS report.
 - The DPIE forecasts that 45% of households will be couples with children. From the 2016 ABS statistics, this group accounted for 47% of dwellings in Ku-ring-gai. So only minimal change.
 - Similarly, the DPIE forecasts 42% will be lone and couple households. The 2016 ABS statistics, count this group as 40%. **Again not a 20% change!**
5. Persons per household have remained relatively stable
 - The ABS statistics show that the average household size for Ku-ring-gai has not changed with any significance. In 2006 it was 2.9, in 2011, 2.88 and 2.87 in 2016.
 - Similarly over these years, the 4 person household has actually increased from 23.5% in 2006, 23% in 2011 to 23.7% in 2016.

The KHS report supports the above, stating 'In the Ku-ring-gai LGA, the average household size has declined marginally. Between 2006 – 2016, growth in one, two,

three and four person households occurred, with more restrained growth in five-person and above households.’ (Housing Needs Pg 35)

There is a complete lack of substantiation in the report for a 2.38 average household size!

This information is in direct opposition with the forecast reduction in household size of 20%, upon which the new dwellings target has been set.

As such we recommend that a new dwelling target is more aligned to the facts and seeks a maximum of 8,677 new dwellings over the 2016 to 2036 period. Half of which are already completed or approved.

Recommendation 1: Amend the targeted dwelling numbers to 8,677 to align with the population growth, as supported by the DPIE forecasts.

B. The KHS is not supported by critical studies

In 2002, Baseline studies were developed to inform the number and siting of new dwellings in Ku-ring-gai. These assessed the potential impacts on the environment, heritage and neighbourhood character, traffic and parking, and infrastructure. **None of these studies have been completed for this impost of even more dwellings.**

There will be a Local Character mapping study completed sometime before the end of stage1 (2021), which is far from satisfactory. This is both inadequate to conserve and protect our environment and heritage, and is completely the inverse order of what an orderly process would entail.

Recommendation 2: No changes to current controls until baseline studies are completed for not just the Local Character, but also covering heritage areas, environment, traffic, parking and infrastructure needs.

C. There is no justification for pursuing a high rise and high density strategy to meet new housing needs.

Based on numbers supplied in the Technical Document (pg 62/63) there will be an excess of 694 dwellings from the combination of already built and DA approved dwellings over Stage 1 to 2021.

This excess of 694 dwellings added to the capacity available under existing controls of 1,604 in Primary Local Centres and 1,076 outside of these, provides 3374, which exceeds the stated Stage 2 target.

When a correct new dwellings target of 8,677, based on population projections as above, then the total new dwelling number will be substantially achieved, at 7,374, with minimal new dwellings required going forward. This reduction in projected net migration, see Figure 6 from the Housing Needs study, supports a substantial reduction in new dwellings thereafter.

Recommendation 3. There is no need to change current zoning and planning controls as the new dwellings can be substantially met by existing controls. There is no need to contemplate apartment towers of 10, 15 or 20 storeys in Ku-ring-gai to meet our new dwelling needs.

D. Extension of town centres to allow more density will have massive detrimental impact to the environment, heritage and character of these centres.

The reduced need for rezoning areas has a major impact on the development levels required within the Primary Local Centres and hence will substantially assist in minimising the destructive aspect of medium and high density rezoning.

With the uptake of the existing capacity in the town centres for apartments, the majority of new dwellings could remain as medium density and more easily blend within the existing local character as well as provide the housing diversity for the community.

This Draft Housing Strategy focuses on Lindfield, Gordon, Turramurra and St Ives town centres for the first 10 years. (See Housing Priority H1).

In the LSPS, it is acknowledged that the population of Ku-ring-gai has experienced a 20% growth rate from 2006 to 2016, with this population growth concentrated in the suburbs of Lindfield, Killara, Gordon and St Ives, primarily as an increase in high density housing along major roads and North Shore rail line.

The Ku-ring-gai Housing Strategy Technical Document (KHSTD) now projects another population increase of 21% to 2036 to a population of 147,809.

Again Council is targeting these Primary Local Centres of Lindfield, Gordon, Turramurra and St Ives for 100% of the capacity for stages 2 to 4, the 15 years from 2021 to 2036. This is unacceptable and unnecessary if the existing capacity under existing controls is taken into account.

Under this Strategy, large tracts of these Primary town centres are being targeted for medium and high density dwellings to meet NSW Planning dwelling numbers.

Though the mapping has highlighted areas of constraints, there remain large areas designated for medium density and apartments across an 800 metre radius from the town centres.

As much of Ku-ring-gai's built heritage and threatened natural environment lies in these areas and along the Pacific Highway and St Ives ridgeline there will be massive degradation of these elements as well as further increased congestion, stress on education, parking and community services in these local centres.

Recommendation 4. These Primary town centres should not be targeted with 100% of any new dwelling targets as they have already experienced considerable increased densification.

E. Unacceptable heights for Apartment Towers when the community wants more diverse medium and low rise housing options.

A 10, 15 or 20 storey apartment tower will have a hugely invasive impact on these town centres and Ku-ring-gai overall. Ku-ring-gai has to date maintained heights that would not extend above the tree canopy. This must be maintained, otherwise the 'green' environment which supports Ku-ring-gai's unique character and 'nationally significant environmental and biodiversity assets' will be lost.

Ku-ring-gai is a series of small local centres, not a city such as Chatswood or Ryde. It is essential to an international city such as Sydney that areas retain their individuality and unique heritage and landscape and not present an experience of each LGA being unrecognisable from each other as part of an amorphous whole.

The community consultation process highlighted that the community does not want high apartment towers, but wants a diverse range of housing choices. These predominantly were for town houses, villa homes and terraces, not more apartments. The strong thrust of these consultations was to protect Ku-ring-gai's unique character and heritage. This will not be achieved with high rise apartment towers!

Recommendation 5. Nothing above 8 or 9 storeys, the heights of new developments in Lindfield, should be allowed anywhere across Ku-ring-gai.

F. Infrastructure is lagging and unfunded

The strategy refers to the importance of Infrastructure to support housing development, but fails completely in identifying what is required, such as any timeline or funding for its delivery. The plan does not lock in or plan to deliver any new infrastructure or its funding.

New infrastructure projects continue to lag behind existing growth in dwellings and current infrastructure cannot support further growth, including school capacity, traffic congestion, recreation, community services and parks and open spaces.

All community workshops raised infrastructure as a major concern NOW, even before additional housing is considered. Especially in the areas of transport, education, health, utilities, community facilities, recreation, arts and culture, and open space.

Council has already failed to deliver on Parks (aside from Pocket Parks), Open Space or Community facilities (apart from the West Pymble Aquatic Centre) to support the community in respect of the massive growth already achieved in the past 15 years in the Primary Town Centres and across Ku-ring-gai.

The Ku-ring-gai Local Environment Plan Review pages 48/49 state that the "*The planning and delivery of local infrastructure is limited by the amount of funding that can be generated by Council*" and "*Council's limited financial resources preclude the provision of key infrastructure to support expected increase in the use of both the N-S and E-W corridors*". Therefore, it would be irresponsible and bad planning to go ahead with the KHS without adequate assessment of required infrastructure and the assurance to be able to deliver it.

Recommendation 6. No changes to existing controls and zoning until infrastructure is funded and approved for delivery to support the earlier population and proposed future population increases.

G. Inadequate protections in all areas are not addressed as part of the KHS action plan or guaranteed

Though the Housing Priorities H1 and H2 all refer to the North District plan N6 priority of 'creating and renewing great places and Local Centres, and respecting the District's heritage', the Ku-ring-gai LSPS and KHS fail completely in citing any objective that mentions preservation and conservation of Ku-ring-gai's unique character.

All through the documents, statements appear regarding the importance and significance of the Ku-ring-gai environment, our local character, our Federation and Inter-War homes, gardens and streetscape. But not a single Objective addresses the management and protection of these assets.

In Housing Priority H1, the statements focusing housing close to centres and transport are in direct contradiction to the following statement of minimising housing growth in areas of heritage conservation and biodiversity value. The heritage buildings in Ku-ring-gai are close to the centres and our heritage railway line! Similarly, many of our threatened ecological communities are also located along the Pacific Highway ridge, such as the critically endangered Blue Gum High Forest and Sydney Turpentine Forest areas is unacceptable.

In Housing priority H3, we see one Objective related to maintaining local character, 'To facilitate high quality housing that is responsive to Ku-ring-gai's local character'. With K12 from the LSPS stating '*Managing change and growth in a way that conserves and enhances Ku-ring-gai's unique visual and landscape character*'.

However, there is no detail on how this is to be achieved as the Action Plan states only 'Undertake a Local Character Study in accordance with Department of Planning, Industry and Environment's Local Character and Place Guidelines to inform the preparation of local character mapping and local character statements.'

The proposed heights of apartment towers, the increase in density in an ever-widening arc around town and neighbourhood centres does not provide any confidence that this objective will be achieved or given due diligence. The fact that studies into protecting the current environment, heritage and local character are still years away, means they will be impacted before any baseline is finalised.

Essentially mapping the existing local character does not highlight the loss and damage to date, mapping does not mean protection or conservation with mapping planned for a date following changes to the LEPs, so it is essentially tokenistic.

More rigour needs to be placed in the Housing Priorities regarding protection and conservation of our heritage, tree canopy and biodiversity. New or revised objectives need to be included under H1, and H2.

Targets for protection zones need to be included. We need to ensure the visual character unique to Ku-ring-gai is retained for future generations. Progressively throughout Ku-ring-gai our remaining heritage areas are being encroached and overlooked by high density developments. These protections are long overdue.

Recommendation 7. The KHS needs to be amended to add concrete protections for heritage, biodiversity and visual landscape. These need to be included as an objective and action to

- Retain of ALL areas of tree canopy and urban forest areas.
- Ensure a 250 metre non-development perimeter to all Heritage Items and Heritage Conservation Areas, thereafter only low-rise development
- Ensure a 250metre non-development perimeter to all urban forests and areas of threatened biodiversity, thereafter only low-rise development
- The KHS must be ecologically sustainable

H. Ku-ring-gai amended Medium Density Complying Housing code

FOKE supports the need to modify the NSW Planning's Low Rise Medium Density Housing Code to deliver a locally appropriate medium density model that protects Ku-ring-gai's heritage, environment and local character, under Housing Priority H2. The current model of complying medium density proposed for R2 zones would have destructive results within Ku-ring-gai. The existing code will have undesired impact on our sensitive flora and fauna, our bushfire, riparian and flood prone zones, our urban forests and green canopy, and our heritage items and conservation areas.

Ideally, a Ku-ring-gai code would be only partly complying. It needs to limit the areas applicable, focus strongly on protecting the garden landscape and tree canopy, meet local character and heritage protection tests and include some notification for neighbours. It is neighbours that may be able to raise specific issues that Council would otherwise overlook. It is essential in all matters with regard to the Housing Strategy that Ku-ring-gai retains its unique character and environment for future generations and retains its focus as a safe family friendly locality.

We agree the timetable should be no later than 2021.

Recommendation 8. Modify the current complying Low Rise Medium Density code to better protect Ku-ring-gai's unique assets and reduce impact on already stressed infrastructure.

I. Housing preferences do not agree with community views

The comparison of the high level of single detached dwellings to other areas in Sydney is not relevant. This is an essential part of the heritage of Ku-ring-gai and the way it has developed over the past 100 years from forests, orchards to suburbs and needs to be protected.

The Housing Needs study highlights that most of the migration into Ku-ring-gai is from families with a preference for single homes, more space, parks and recreation facilities. Community consultation continues to support a preference for detached homes for the majority of residents.

Housing for an Ageing Population, Section 5 of the Housing Needs Study, makes assumptions of the preference of ageing residents for apartments, due to the movement of this cohort into apartments. As Ku-ring-gai has very little in the way of alternative housing choice, as shown by comparisons with other areas, this preference is a result of wanting to age in place, rather than move to other areas.

The Community Consultation process has shown that older residents prefer options of villa homes, such as built in St Ives prior to developers convincing Council that apartments are preferable, followed by townhouses and terraces. This is borne out by Elton consulting that suggests that with greater housing diversity that 50% of older residents would prefer low rise medium density options.

Recommendation 9. Increase housing choice to include more low rise medium density options. Leave existing zoning for apartments in the town centres.

J. The need for higher towers in town centres to increase take-up rates is not supported

From the Technical Document (page 86) the statement is made that the take-up rates for residential development in the R4, R3 and B4 zones across the four Primary Local Centres are at good levels indicating the existing planning controls are not impeding the development of medium and high density housing.

However, it then contends that the current controls are impeding the take-up rates in B2 mixed use Local Centre zones for 2012-2019, with poor take-up in Gordon, St Ives, and Turrumurra (all less than 5%) and moderate take up in Lindfield (43%).

This conclusion of take-up rates in B2 areas, that need additional heights and looser planning controls does not stack up. More to the point is the fact that many retail tenants in B2 zones are long term and it can be difficult to amalgamate the sites in a short timeframe. As Ku-ring-gai is a desirable area for living, these sites will be taken up eventually without the need for change.

Overall, the numbers do not compute. Especially as the substantial developments in Lindfield alone re the Village Hub and Lindfield Library site are not yet at DA level. Mixed use at the Lindfield Coles site and Village Lane project are now progressing.

The KHS still regards the potential pipeline under existing controls in this area as approximately 5,602 dwellings, which is a substantial proportion of any of the required new dwelling numbers.

One needs to consider whether the low take-up in some areas may reflect the fact that Ku-ring-gai is a family oriented area and as such mixed use developments are not as appealing. Allowing higher levels will just destroy the town centre character while preferences will remain for non-mixed use development

Recommendation 10. It is Council's responsibility to ensure that the existing capacity under current rules is taken up, offering more options will only extend the town centre and increase heights for no community gain except for the profitability of the developer.

How this conservation and protection of Ku-ring-gai's character can be achieved with the issues highlighted above is FOKE's main concern. We remain convinced that it is not realistic to manage the rapid change with this level of population growth as well as 'conserving and enhancing Ku-ring-gai's unique visual and landscape character'.

The last 15 years of urban consolidation in Ku-ring-gai has seen the increased loss of heritage and the environment without the provision of adequate safeguards or appropriate prescriptive protection in place. Ku-ring-gai's valued heritage conservation areas and ecologically threatened environment is predominantly situated within 800 metres of the rail line and St Ives centre, the very last areas where high density development should be considered if the aim is to conserve and protect heritage and the environment .

Concentrating high density development in classified heritage areas and areas of high ecological significance is highly inappropriate and can only be described as destructive top-down 'one size fits all' ideological planning. We believe the KHS proposals will only exacerbate and compound these losses further. The conservation of our natural and built heritage and environment, and our local character should take priority in any compromise between these competing objectives.

Council has the responsibility to protect and preserve the last remaining remnants of Ku-ring-gai's critically endangered ecological community namely the Blue Gum High Forest (BGHF) and endangered ecological community the Sydney Turpentine Ironbark Forest (STIF). These endemic tall tree species predominantly grow within 800 metres of the rail corridor and the St Ives centre where the KHS is targeted for increased population and development. The KHS and the resultant rezoning proposed for medium and high density development will only threaten and endanger these protected communities further. BGHF and STIF have not only been impacted by high density development but also from wild storms, climate change impacts and destructive State Government policies such as 10/50 Vegetation Clearing Code which has seen many hundreds of protected trees lost in recent years. This cannot continue to happen if Council's objective is to ***'conserve and enhance Ku-ring-gai's unique visual and landscape character'***.

The KHS requires significant review, amendment and backed up with critical studies with further community engagement and consultation before finalisation. It is essential that the requirements for new infrastructure such as the provision of open space and parkland, community and sporting facilities, be assessed, planned and delivered before the finalisation of any new Planning Proposals and a LEP.

The fact that past critical baseline studies have been ignored and continued to be ignored demonstrates to this community that Council and the State Government are not genuine in delivering a KHS that is in keeping with Ku-ring-gai and that will ***'conserve and enhance Ku-ring-gai's unique visual and landscape character' or a KHS that is ecologically sustainable.***

Finally, the KHS will need to be reviewed and examined in light of the COVID-19 health crisis which has impacted Australia and across the World. It is predicted that the impacts

from what could be a prolonged uncontained pandemic, will impact the flow of immigration and the World economies for some time to come. Economists are predicting countries including Australia, to experience at the very least a Recession or in the worst-case, a Depression.

The KHS will need to be reassessed in light of the potential for a significant reduction in immigration and therefore population increase and long-term growth implications. Potentially the reduction in immigration will impact the real estate, housing, building and development sectors.

The COVID-19 has shown that people living in highly populated cities and urban densities are more likely to suffer health impacts from Global Pandemics. The fact that the Ku-ring-gai population is predominantly housed in single dwelling houses is more conducive to enabling separation from neighbours and ‘social distancing’, therefore less scope for spreading highly infectious diseases. Whereas high rise buildings house large numbers of people living in more confined areas with the likelihood of closer interaction and the spreading of disease e.g. New York and other major cities across the World which have had difficulty in the containment of COVID-19. We have learnt from the experience of people on cruise ships and in nursing homes, that when people are confined together and unable to ‘social distance’ infection spreads more rapidly and is difficult to contain.

Ku-ring-gai Council as have other councils suffered economically during the pandemic. Council’s budget and financing will need to be re-evaluated, re-financed and managed in terms of the current and future economic downturn and in the planning and resourcing of baseline studies, new community infrastructure and facilities.

We look forward to Council reviewing and amending the KHS in line with our recommendations, community expectation and ratepayer submissions.

Yours faithfully

Kathy Cowley
PRESIDENT

cc Ku-ring-gai Mayor and Councillors
cc Minister for Planning and Infrastructure, The Hon Robert Stokes MP
cc Dr Debra Dearing, North District Commissioner Greater Sydney Commission
cc The Hon Jonathan O’Dea MP
cc Mr Alister Henskens SC MP
cc The Hon Paul Fletcher MP
cc Members of Friends of Ku-ring-gai Environment and Ku-ring-gai Community Groups