

DRAFT KU-RING-GAI HOUSING STRATEGY ON PUBLIC EXHIBITION UNTIL 8 MAY 2020



This Draft Ku-ring-gai Housing Strategy (KHS) document, following on from the Ku-ring-gai Local Strategic Planning Statement (LSPS) approved by Council and the Greater Sydney Commission (GSC) in March 2020, provides the next step in the determination of the development of Ku-ring-gai over the next 20 years to meet the State Government's dwelling targets.

Ku-ring-gai has been tasked with supplying 10,660 new dwellings as determined by the GSC and the Department of Planning, Industry & Environment.

The following assessment of the key element of the KHS have been made by FOKE following a review of all the attached documents of this Draft Housing Strategy. The main document is lacking in relevant details for residents, with the full detail of the impact of the Strategy included in the Technical Document and Ku-ring-gai Local Centres Housing Capacity Study!

These are five key points you can make in your submission. With some background information which you can draw from in support of each point. Please adapt the following to suit your own style of expression. Your submission can be short and simple!

1. New Dwelling Numbers are too High.

The LSPS acknowledged that the population of Ku-ring-gai has increased by 20% from 2006 to 2018, with a concentration of this increase in Lindfield, Killara, Gordon and St Ives over the past 5 years. The Ku-ring-gai Housing Strategy Technical Document (KHSTD) now projects another population increase of 21% to 2036 to a population of 147,809 (pg17). This is more than a 40% population increase over 30 years. This is an unsustainable increase that will adversely impact our environment, infrastructure, heritage, character and amenity.

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.

This Draft Housing Strategy is solely based on capacity and financial viability studies to ensure the delivery of new housing. And still these target numbers do not include additional housing requirements from senior housing, SEPP living and affordable housing requirements.

The target dwelling numbers are to be allocated in 5 year spans starting in 2016. Hence the 4000 required for Stage 1 to 2021 is substantially completed, either built or approved. However, another 3,000 is required for the next stage to 2026, and 1,800 each for stage 3 to 2031, and stage 4 to 2036.

The Draft Housing Strategy acknowledges that the 4000 new dwellings in Stage 1 will be met by existing planning controls. In fact, 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 this period to 2021.

This pipeline 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 3000 Stage 2 target.

As such, capacity under current planning controls meets and exceeds the dwelling target for Stage 2 to 2026! There is no justification for pursuing a high rise and high density strategy as proposed.

2. 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.

In Stage 3, the period to 2031, would, with a reduction of 374 dwellings, require 1426 new dwellings, rather than 1800, to be built. With the previous uptake of the existing capacity, the majority of these could remain as medium density.

Under this proposed Housing Strategy, the new dwellings are planned to be within 800 metres of an existing transport mode, or area scheduled to have transport infrastructure upgrades. 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 'significant growth' rate for the 10 years from 2006 to 2016, with this population growth concentrated in the suburbs of Lindfield, Killara, Gordon and St Ives, which have seen an increase in the provision of high density housing along major roads and North Shore rail line.

However 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, being a total of 6,600 new dwellings, weighted towards the earlier stage 2. This is unacceptable and unnecessary if the existing capacity under existing controls is taken into account.

Housing Capacity Study - 15 years 2021-2036 6,539 - 6,897 new dwellings (approximation)			
Gordon	Lindfield	Turramurra	St Ives
1,490 - 1,636	1,612 - 1,660	1,787 - 1,841	1,650 - 1,760

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, such as Heritage Items and Heritage Conservation Areas, biodiversity, slope, bushfire, riparian lands, land use and some strata titled properties, there remain large areas designated for medium density and apartments across an 800 metre radius from the town centres. (see Appendix C - Ku-ring-gai Local Centres Housing Capacity Study).

We contend that these Primary town centres should not be targeted with 100% of any new dwelling targets as they have already experienced considerable increased densification. As much of the built heritage and threatened natural environment of Ku-ring-gai 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 and community services.

As part of the strategy, other areas including neighbourhood centres will be investigated for further housing supply aiming for a 400 metre radius from their centres. This should be curtailed to half this.

3. Unacceptable Heights for Apartment Towers at 10, 15 and 20 storeys

The proposed new dwellings will be in apartments, townhouses, terraces, villa homes, dual occupancies. The various scenarios referred to in the Housing Capacity study referred to apartments as from 10 to 15 storeys in height for the Primary Local Centres and up to 20 storeys for Gordon.

A 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.

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

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!

4. 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. 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 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.

5. Inadequate protections

Housing Priority K12 states 'Managing change and growth in a way that conserves and enhances Ku-ring-gai's unique visual and landscape character'.

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.

We need protections for our Heritage Conservation Areas and Listed Heritage buildings to ensure they have a protection zone of no impeding development within a radius of 250 metres or more. We need larger protection zones around our threatened and unique biodiversity and Forest areas.

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 conservation of our natural and built heritage and environment, and our local character should take priority in any compromise between these competing objectives.

To see the full reports and Have Your Say, the following link is provided:

www.kmc.nsw.gov.au/Popular_pages/Ask_discuss_or_comment/Have_my_say_public_exhibitions/Draft_Ku-ring-gai_Housing_Strategy

It is extremely important that you take some time to express your views on areas of the Draft Ku-ring-gai Housing Strategy. The next steps from Council will be changes to Local Environment Plans and rezoning of areas for medium or high density.

Council will be finalising the Housing Strategy and submitting it to the State Government in June 2020. Changes to the Local Environmental Plans will then start to proceed.