

Submission
No 207

INQUIRY INTO DEVELOPMENT OF THE TRANSPORT ORIENTED DEVELOPMENT PROGRAM

Organisation: East Gordon Residents

Date Received: 28 March 2024

Partially
Confidential

On Sunday 28th January, a small group of residents from streets across East Gordon met to discuss the proposed planning changes to our suburb by the NSW State Government.

The meeting was hosted by Dr Sandra Van de Water, a GP and longterm resident of , Gordon.

Also in attendance were Barbara Ward and Simon Lennon- our GORDON WARD KMC COUNCILLORS and residents from streets across East Gordon. Below is the submission compiled from our East Gordon Resident's Meeting.

SUBMISSION

The residents accept the need for increased density across NSW but object to delivering disproportionate higher density in Kuringai.

We also object to large scale destruction of trees and heritage neighbourhoods in Kuringai and the scale of new housing across not one, but FOUR, station precincts.

We object to further highrise of mid rise apartment blocks within 400 metres of the east side of Gordon station and two storey apartment blocks within 800 metres.

However, dual occupancy, if integrated into existing streetscapes of Gordon, allowing for trees and heritage homes as well as suburb character, would be acceptable.

We object to the haste of the proposals and the State Government Planning Department's refusal to accept submissions from residents regarding the TODs, even though many of us live within the 800 metres.

The limitations to massive development in Gordon, and our objections to the haste of the process, are clearly outlined below.

Prior to the meeting, we read the NSW Government Planning Department website where there are a lot of motherhood statements and inaccurate representation of what will actually be provided for communities around the railway hubs.

The residents discussed the statements on the NSW Planning website.

For instance, under the heading " *What does this mean for local communities?*" the website states that "*existing communities will benefit from improved access, walkable*

neighbourhoods, a great mix of housing choices , public open spaces, a vibrant night life and other new amenities and services."

The Residents dispute whether the above scenario will become a reality. Gordon has already filled housing quotas for the west side of Pacific Highway with massive highrise apartments, meeting State Government requirements up to 2023.

Yet despite multiple highrise buildings infilling the west side of the Pacific Highway in Gordon, we have NO new parks, NO new sporting facilities, NO new civic spaces, a tired shopping precinct with NO vibrancy, NO new schools, traffic gridlocks, tree loss, aging infrastructure and loss of cohesive community.

This makes it laughable that the Planning department wants to *"infill existing urban areas to do density well as these areas are well serviced by infrastructure and have capacity for growth"*.

Nothing has been provided in Gordon in the last phase of development up to 2023, yet somehow infrastructure will magically appear in the next phase of mass population growth for Gordon in the next ten years ?????

WE ARE ALREADY AT CAPACITY IN GORDON AND REFUTE THE NSW PLANNING DEPARTMENT STATEMENT THAT WE ARE "WELL SERVICED BY INFRASTRUCTURE."

THE EAST GORDON RESIDENTS HAVE THE FOLLOWING QUESTIONS FOR THE NSW PREMIER, PLANNING MINISTER AND PLANNING DEPARTMENT

EXHIBITION PERIOD

1. ***Why were the proposed new Housing zones including TODs exhibited over the Xmas/January holidays when most people are away or in holiday mode and Parliament was not sitting?***

Many of the residents were completely unaware of the proposed changes to our suburb due to the exhibition time being over Christmas and January holidays and back to school.

By exhibiting over this period and with a very short time frame, this has not given residents nor Council adequate time to be well informed and complete submissions.

Nor have residents within the 800 metre zone of each TOD been accorded the opportunity to send submissions to the NSW government despite the imminent and drastic changes to their lives.

Our Conclusion

The timing and short duration of the exhibition plus the overall lack of information (eg projections for population and analysis of infrastructure capacity) implies to residents that the State Government is aware that it is an ill conceived and poorly designed plan.

We conclude that it has been a "tick the box process" favouring developers. By rushing through the consultation process, the only conclusion that can be drawn by Council and residents is that the NSW State Government is imposing drastic changes to four Kuringgai suburbs with tokenistic consultation for political expediency.

Excluding residents within the TODs from adequate consultation and due process such as allowing submissions to the State Government regarding their individual homes and their suburb, is ***anti democracy***.

We hear of government policies imposed on citizens in autocratic countries where *corruption is rife*, such as Russia.

But a didactic, one-size-fits-all planning model proposed by the NSW State Government, is unAustralian.

The Housing policy document and proposals are not future proofing and are not good governance.

It is disorderly development contradicting all best planning for a liveable, sustainable city.

ANALYSIS and POPULATION PROJECTIONS

2. *What studies and analysis of our infrastructure has the State Government done to support the notion that Gordon is "well serviced by existing facilities and infrastructure?"*

The NSW State Government has provided very little information on its website. Nor have Council or residents been provided with population projections nor given time for proper analysis of our infrastructure.

Without this, it is impossible to predict if the increase in dwellings in the TOD areas will be matched by new infrastructure or what the capacity of the current infrastructure is to cope with massive development.

Basic planning principles are being superseded by Housing numbers. People are not people in the document. They are "housing".

This is 2024 where Australians expect far better than this.

We expect our politicians to adhere to planning doctrines that are Best Practice and sustainable and offer solutions to climate change and sustainable population growth -not political expediency and wholesale destruction of existing communities.

We expect that planning will be led by communities and Councils, not developers and faceless government officials.

LIST OF SPECIFIC GORDON INFRASTRUCTURE AND FACILITIES DEFICITS

-OPEN SPACE

Gordon already has the LOWEST ratio of usable Open Space per head of population in

Kuringai. There are very few parks and playgrounds and almost none within walking distance of homes. Open Space for incidental exercise is minimal, residents are forced to walk on the golf course or footpaths.

Open Space cannot be retrofitted.

4.4 of the Housing document states that *"We are seeking feedback on council's preferred approach as a result of the proposed changes. The aim is to ensure that delivery of local infrastructure occurs at a rate that will keep up with the anticipated growth"*. Given the indecent haste to implement the policy by April, residents do not believe this statement is genuine or doable.

-SCHOOLS

We have one small primary school at capacity, Gordon East Public School.

What population projections have been done re the number of families and children that the suburb can take before we run out of places in local schools?

-HOSPITAL AND EMERGENCY CARE

Health facilities and ambulances will be stretched if the current housing proposals in Kuringai are implemented.

Gordon has no access to a public hospital within a 25 minute drive to an emergency department. Accident and emergency departments are already at capacity as are paramedic and ambulance services.

What planning and population projections have been done to demonstrate capability for basic access to emergency facilities for the residents of Gordon???

-CLIMATE CHANGE

What Climate Change analysis and stormwater analysis has been done to assess the potential for increased heat and flooding with removal of up to 30,000 trees across Kuringai? Our tree canopy provides cooling and tree roots intercept rainfall to prevent flooding.

Gordon has already had many freak weather events due to climate change, including a mini tornado in 2019 that caused widespread destruction to trees and canopy and bush land loss.

-BIODIVERSITY AND CANOPY

Biodiversity awareness in Kuringai is essential to support our wildlife populations. Our trees provide habitat stepping stones. Our garden blocks in Gordon and Kuringai are home to a multitude of animals including possums, bush turkeys, bandicoots, bees and birds.

The gardens of Kuringai are unique and deserve protection to sustain such unparalleled biodiversity, unheard of in a major international city.



Our suburban garden in

Gordon, has 19 small trees and a cottage garden

housing creatures and providing beauty. It's a slice of rural living close to urban areas but according to TOD Housing proposals, my block with its trees and gardens can be levelled for 2 storey apartments with minimal tree and garden coverage and no regard for 100 years of history.

-HERITAGE STREETSCAPES

Heritage homes and streetscapes are an historical feature of Kuringai suburbs, highly valued by residents. Council surveys endorse these views- that what makes our suburbs desirable are the streetscapes and gardens. They are indisputably why we live here. State Government planned housing development proposals will level the heritage of Kuringai and change our suburbs to soulless cookie cutter urban living.

Heritage buildings will lose context if wedged between highrise.

Gordon has a wealth of history with Eryldene, home of Professor Waterhouse in MacIntosh St and the home of Annie Wyatt, the founder of the National Trust in Park Avenue as well as the beloved Gordon preschool building. Outstanding heritage East Gordon streetscapes include Nelson, Edward and Macintosh streets that should be preserved.



Eryldene Historic House and Garden | Sydney NSW

-TRAFFIC

Traffic in Gordon is already at capacity and our streets are full of commuter carparking. The higher density proposed with four homes per suburban block will see hundreds more people in Kuringai who will all want to park at Gordon station. Trains may take residents to work but

not to sport, beaches and peripheral suburbs. Sydney has a star shaped rail network with no ring circles out to peripheral suburbs as in dense cities overseas. Thus all residents will use their cars. We envisage a traffic disaster similar to the situation in Rozelle where residents are gridlocked within their suburb at peak hours and have no way out eg to drive to local schools or shops

-COMMUNITY FACILITIES

Council has already done studies showing there is an existing shortfall of libraries and community facilities of a high magnitude for our current population across Kuringai. In Gordon, we have no central squares, no plaza, no civic spaces or public halls. We have no area for cultural activities or for local celebrations or for large community gatherings. In short we lack a SOCIAL HEART or HUB. It is the furthest from a "vibrant" suburb that one could imagine.

CONCLUSION

Gordon lacks the necessary infrastructure to support massive development as proposed under the Transport Oriented Development Program 3.1 and 3.2 of the Housing Changes document.

The new planning proposals will devastate our heritage, streetscapes, trees and biodiversity.

The new proposals have no provision for new facilities or community spaces and do not allow for Council to plan accordingly in a rushed time frame.

HUMAN RIGHTS

3. What provisions for basic human rights have been allowed for by the State Government?

Access to health, schooling and opportunities for recreation are Human Rights according to the United Nations.

Children have the Right To Play, yet nowhere in the State Government document is the word "child" mentioned. Nor are specific provisions made for children.

We see no evidence on the NSW Government's website that they have planned according to basic needs and rights of populations and communities.

The proposed housing solutions look like a student assignment for planning a city thrown together in haste over a weekend without a basic understanding of sustainable communities and town planning principles.

Anything done in haste, without regard for longterm effects, is not going to withstand the tests of time. Moving large groups of people into an area without proper planning and facilities for integration of new residents, and without consideration for the existing population, will create social schisms and divides.

Our Conclusion

The proposals do not allow for mandatory provision of services and infrastructure . Thus

basic human rights such as health, schooling and recreation cannot be guaranteed. The Housing policy ignores the Child's Right To Play. The current State Government planning proposals do not adhere to Best Practice and are unacceptable in their current form.

OPEN SPACE

What analysis of our Open Space has been done by the NSW State Government and what allowance has been made for provision of usable Open Space for children, the elderly, disabled and their carers, grandparent carers and families in Gordon?

The residents unanimously agreed that Gordon has a deficit of usable Open Space provision within walking distance of homes.

Gordon's hilly topography adds to the poor access to Open Space.

Access to Open Space within walking distance of dwellings is deemed essential on the Department of Planning's website and a key criteria of urban planning. The deficit of Open Space in Gordon is contrary to the Department of Planning's own document "Greener Spaces".

An analysis of Gordon's Open Space by residents has found the following:

Across the suburb, East and West of Pacific Highway, the total of parks and playgrounds are as follows

- Gordon Recreation Ground with 4 tennis courts and one very small playground
- Darnley Oval with a junior sporting field and one flying fox
- Holford Crescent Park, a thin strip park with very little space and junior play equipment
- Annie Forsyth Wyatt Garden, a tiny strip of land near Gordon station with one seat and one gum tree
- A new urban park is proposed behind Council chambers to replace three blocks of land that were gazetted for Open Space in Dumaresq st. The original three blocks were rezoned by Kuringai Council as "operational". The new Civic Space replacing the Dumaresq Open Space will be a dismal, narrow strip behind tall buildings and with no spaces for children and families to play or picnic. It may be used by workers for a quick lunch but laughable to consider it a usable community space for a whole suburb.
- Richmond Forest has 2 tennis courts, no play equipment
- Gordon Golf Course

Our Conclusion

Gordon has a well documented existing DEFICIT of usable Open Space, playgrounds and sporting facilities.

Gordon has the lowest ratio of usable Open Space per head of population in Kuringai.

There are very few playgrounds and no spaces to walk a dog to or for people of any age to take a ball or frisbee and get outdoors.

Grandparents and the elderly and the disabled are discriminated against, as the hilly topography mitigates against access to the small parks that are in existence.

As we have NO sporting facilities such as ovals and netball courts, families and individuals are forced to drive to facilities- negating the environmental advantages of the train line. The

North Shore line only services commuting.

There is far more than just provision for travel to the workplace that is required in sustainable and healthy urban planning!!!!

Kuringgai Council acknowledges that once land is rezoned within the 800 metres TODs areas, it will become very expensive, making it difficult for Council to acquire new land for Open Space.

Thus Council will have NO capacity to deliver Open Space for future and existing populations.

The removal of canopy and trees for the new developments, will create ugly streetscapes unrelieved by greenery. We do not have local parks to escape the confines of apartment living.

The lack of setbacks for apartments will see minimal gardens and trees. Large street trees will not grow due to the concrete slabs for underground parking.

This is deemed a POOR planning outcome for health and recreation reasons.

Without access to greenery and Open Spaces studies have shown adverse health outcomes including physical and mental health deterioration and a higher incidence of antisocial behaviour, domestic violence, obesity and diabetes.

Social connections are severely damaged when a suburb is highly urbanised and lacking parks and gardens.

See diagram below demonstrating the deficit of district and usable pocket parks and sporting facilities in Gordon.

GORDON



Figure 3.2: Total Open Space in Ku-ring-gai

Category	Area in Metres ²	Area in Hectares	% of Total	Metres ² Per Capita
Urban Parks (169) ¹⁰⁷	614,143.6m ²	61.4ha	4.3%	6.2m ²
Public Gardens (10)	58,661.8m ²	5.9ha	0.4%	0.6m ²
Subtotal Local Parks (179)	672,805.3m²	67.3ha	4.7%	6.8m²
Sports Reserves (46)	1,207,411.2m ²	120.7ha	8.4%	12.1m ²
Tennis Courts (19)	65,469.7m ²	6.5ha	0.5%	0.7m ²
Bowling Clubs (4)	44,347.6m ²	4.4ha	0.3%	0.4m ²
Subtotal Sporting Reserves (69)¹⁰⁸	1,317,228.4m²	131.7ha	9.1%	13.2m²
Sub-total Local Parks and Sporting Reserves (248)	1,990,033.8m²	199.0ha	13.8%	20.0m²
Golf Courses & Precincts (3)	692,962.5m ²	69.3ha	4.8%	7.0m ²
Natural Areas (136)	11,422,833.7m ²	1142.3ha	79.1%	114.9m ²
Community Nursery St Ives (1)	42,424.0m ²	4.2ha	0.3%	0.4m ²
Ku-ring-gai Wildflower Garden Education Centre Precinct ¹⁰⁹ (1)	41,510.1m ²	4.2ha	0.3%	0.4m ²
St Ives Showground (1)	252,205.1m ²	25.2ha	1.7%	2.5m ²
West Pymble Swimming Pool (1)	6,631.5m ²	0.7ha	0.1%	0.1m ²
Subtotal District & Other Open Space (143)	12,460,466.8m²	1246.0ha	86.5%	126.3m²
Total	14,460,600.6m²	1446.1ha	100.0%	146.3m²

Figure 3.3: Local Urban Parks and Public Gardens

Suburb	Square Metres	2006 ¹⁰³ Population	Per Capita
Wahroonga	54,750.97	11,132	4.92m ²
North Wahroonga	1,906.62	2,017	0.95m ²
Warrawee	3,561.21	2,394	1.49m ²
North Turramurra	31,906.06	3,996	7.98m ²
Turramurra	59,656.71	10,978	5.43m ²
South Turramurra	32,842.70	2,847	11.54m ²
West Pymble ¹⁰⁴	103,479.39	4,834	21.41m ²
Pymble	69,741.71	9,487	7.35m ²
St Ives	87,420.96	13,866	6.33m ²
St Ives Chase	20,260.93	3,001	6.76m ²
Total North	465,547.26	64,492	7.22m²
Gordon	16,245.62	5,228	3.11m ²
Killara	90,516.58	7,360	12.30m ²
East Killara	4,820.90	2,791	1.73m ²
Lindfield	33,176.70	7,985	4.15m ²
East Lindfield	16,867.48	3,441	4.90m ²
Roseville & Chase	45,630.83	8,092	5.64m ²
Total South	207,268.12	34,898	5.94m²
Total Ku-ring-gai	672,805.38	99,390	6.77m²
Total Ku-ring-gai < Bicentennial Park	613,805.38	99,390	6.17m²

What alternative solutions could be considered?

1. Immediate change in deadlines for delivery of the Housing policy. SLOW the NSW STATE Government planning process down and allow Councils to do proper analysis of infrastructure and incorporate public spaces within the precincts.
2. Stage future development around railway hubs such that infrastructure can be planned for and built so as not to overwhelm existing facilities eg stormwater, parks, schools, sporting, traffic. Mandatory planning for Open Space quotas and public squares and plazas within TODs and the greater suburb to be part of the State Government Housing policy. You cannot build high density in cities without places for people to go beyond the supermarket and coffee shop.
3. Limit the number of dwellings in Sydney and start planning for new population centres, similar to the new Bradfield city planned for Western Sydney. What planning has been proposed for rural centres eg Dubbo, Albury, and other rural centres that would welcome urban growth?
4. Limit the spread of highrise in East Gordon. Consider maximum height two storey apartments on the east side of Gordon only on the blocks directly opposite from Gordon Station, within the west side of Rosevale Road. All streetscapes in McIntosh, Nelson and Edward streets to be preserved. Instead of apartments and multi- dwelling housing 200-800 metres from station, allow

OPEN
PROV
POPI
STAT
SOU
FRO
KU-R
CON
PLA

for dual occupancy and GRANNY FLATS at the rear of existing suburban blocks, thus retaining trees and existing streetscapes and keeping heritage items in context. Sydney should not be a city of brick to fence developments. Maximum two dwellings per suburban block across Sydney and mandatory tree and garden planting of at least 30% coverage.

Higher shoptop housing in Gordon or building over the railway line to achieve density could be viable alternatives.

5. All higher rise dwellings including villas and two story apartments must retain large trees and have adequate setbacks to allow for gardens and greenery to soften the buildings and provide environmental cooling.
6. Create truly affordable Housing options and stop developer driven housing solutions. Encourage a true mix of housing types and affordable options for young people such as granny flats that integrate better into existing suburbs. Stop overseas investment that force up housing prices and leave many apartments unoccupied. Strongly Tax unoccupied apartments.
7. Return planning controls to Councils and remove the "no refusal" clause for developments in the TOD that don't meet LEPs.
8. Retain ALL environmental and heritage controls in suburbs across Sydney. In London, a highly dense city, there are strict heritage and greenery controls for all developments.
9. Develop a visionary plan for Sydney that retains our heritage, canopy, green spaces, individual suburb character and streetscapes while integrating sympathetic architecture and housing that is affordable, liveable and sustainable. Stop reliance on highrise as the go to architecture at every train station and use suburb by suburb analysis to tailor the development to the unique characteristics of each suburb. We want to be held up as the best planned, most liveable city in the world. The Minn's Government planning department one size fits all, back of the envelope planning, will be abhorrent now and for all future generations. You have the capacity to change this and rethink a better plan for population growth in Sydney and Greater Sydney.

Further to this submission, we are offering to Mr Minns or Mr Paul Scully to come and see first hand the strength of the community in Gordon and the dire lack of facilities to support the current Housing Policy proposals.

Please contact Dr Van de Water as per below.

Dr Sandra Van de Water,
Spokesperson East Gordon Residents.