



Willoughby Environmental Protection Association (WEPA) Inc  
WEPA, PO Box 4263  
Castlecrag 2068  
[wepa@wepa.org.au](mailto:wepa@wepa.org.au)

30 March 2017  
Greater Sydney Commission  
[Submitted online](#)

**GREATER SYDNEY COMMISSION –  
NORTH DISTRICT PLAN**

I am writing on behalf of members of the Willoughby Environmental Protection Association (WEPA) Inc in response to the call for comments on the draft district plans prepared by the Greater Sydney Commission (GSC).

WEPA, which was established in 1981, is a community-based group with a commitment to protecting the local bushland and biodiversity in the City of Willoughby on Sydney's North Shore and other Local Government Areas (LGAs) in our catchment. While maintaining a wider interest in the overall GSC planning process, the following submission will focus on the approach to urban development, biodiversity and green spaces provided in the draft [North District Plan](#) and its implications for the Willoughby LGA.

**Our Beautiful Environment**

Sydney is unique among Australian capital cities in having urban bushland so close to the city centre. As acknowledged in the draft [North District Plan](#) (p.125), the North District is characterised not only by areas of immense natural beauty but also by the high level of interest shown by its residents in this natural environment. In Willoughby great use is made of the local national parks and bushland reserves, large and small, which fringe the Middle Harbour coastline and are interspersed across Willoughby City. Last weekend the Willoughby City Council (WCC) Fauna Fair, held in Currey Park in the Chatswood CBD area, drew record crowds interested in finding out more about local fauna and flora and bushwalks available in the area.

We have an enviable ability in Willoughby to visit nearby bushland on a daily basis if desired. Tracks such as the ['Rail to River'](#) walk allow people to venture from Chatswood station for more than 3 kilometres through quiet, tree and garden lined streets and bushland parks and waterways to the Lane Cove River. We have the opportunity to take in broad scenic views, for example, from the headland at the Harold Reid Reserve in Castlecrag or from sandstone outcrops in Explosives Reserve at Castle Cove. From these viewpoints we can view Middle Harbour and its vegetation-fringed



foreshores as it may have appeared over 200 years ago. Our reserves and parks provide shelter for endangered birds and animals from the massive Powerful Owl to the tiny Red-Crowned Toadlet and have, in recent years, seen the return of Swamp Wallabies, Lyrebirds and other fauna absent since the 1950s. The value of such areas will only increase with time.

In contrast, over the last five to six years WEPA members have witnessed a sharp increase in the construction of medium to high density dwellings in the district. As a result, we have seen the continuous demolition of characterful houses and removal of long-established gardens and trees in favour of medium to high-rise apartments with concrete surrounds. Our tree canopy has been reduced for a variety of associated reasons, our scenic views impaired and our bushland impinged upon by the stress of over-development. There has also been serious pressure on existing recreation areas, severe traffic congestion, rising noise levels and overflowing schools.

These changes have served to strengthen our resolve to advocate for a fairer and more effective planning system which allows the local community a role in dictating the rate of change and maintaining the character and amenity which first drew them to invest their savings in, and choose to become part of, the Willoughby district.

#### **GSC plans and processes**

WEPA applauds the extent to which the broad goals and language contained within the draft North District Plan refer to biodiversity conservation and the protection of green spaces. There appears to be a presumption in the District Plan, however, that current or proposed legislation is adequate to protect biodiversity, natural ecosystems and urban bushland. The fast pace of biodiversity loss, polluted waterways and open space under threat across Sydney suggests otherwise. While understanding that the district plans have been framed deliberately to deal with a higher level of planning, we would like to urge the inclusion of strategies which both acknowledge the deficiencies of current legislation and introduce more concrete processes to protect bushland and biodiversity.

We would encourage the GSC to provide a clear, strategic direction to balance Greater Sydney's growth and development according to the principles of ecologically sustainable development.

#### **Urban renewal or overdevelopment?**

WEPA is concerned that the sheer scale of proposed increases in dwellings in the Willoughby area outlined in the North District Plan is neither sustainable nor supported by existing need. WCC was one of the first Councils in Sydney to meet its 21 year target under the Sydney Metropolitan Strategy (SMS) to provide additional dwellings. We understand it has now exceeded this target. The North District Plan suggests the inclusion of 1,1250 dwellings over the next 5 years; part of up to 6,750 more dwellings to be added by 2036. This would appear an overambitious increase and, in fact, an



unfair impost on WCC when it has already met its initial SMS target. The [2011 census](#) revealed that Willoughby LGA had more than 2,000 unoccupied dwellings. Could measures such as a vacancy tax encourage an opening up of these pre-existing dwellings to those seeking accommodation rather than resorting to immediate wide-scale development?

WEPA would also suggest that further information is required in the District Plan on how to achieve a balance in different types of housing. While the pressure appears to be on for more and larger apartment blocks in central areas, the growing numbers of local elderly people and 'down-sizers' in our area, as well as those looking for affordable accommodation, may find villas, terraces, courts and town houses more appropriate and liveable. Development on this modest scale has a far greater chance of fitting into the local landscape, maintaining amenity and preserving gardens and trees than the construction of tower blocks.

Rampant growth rates are hard to manage and have significant social and environmental impacts. Without the necessary powers and regulatory framework to integrate planning, infrastructure and environmentally sustainable development, the GSC will not be able to adequately respond to 'left field' proposals such as the recent snap announcement of a Northern Beaches tunnel. How does the tunnel plan, which seems to target parks and reserves in Willoughby for exploratory boring and set them up as potential dive sites and stack sites, fit in with the North District Plan to protect open spaces and biodiversity? Given recent Government actions in other parts of the city, we remain concerned that these types of infrastructure developments will override existing but weak guidelines leading to the destruction of native vegetation for temporary construction access and the parking of vehicles.

### **Green Grid**

WEPA agrees that the Green Grid concept underlying the District Plan is an important part of promoting community health, liveability and improving recreational spaces. As presently conceptualised, however, the Green Grid does not include biodiversity protection. This omission appears to set up a potential conflict between open space used for active recreation and sensitive natural areas along rivers, coast-lines and in nature reserves and parks.

A local priority proposal in the North District plan refers to 'Enhancing open spaces along the Lane Cove River foreshores to create unique recreational experiences'. It should be noted that these riverbanks provide highly diverse habitat for native animals including the small birds which are disappearing rapidly from our gardens and animals like the regionally rare Rakali or Australian Water Rat. The introduction of bike trails, for example, through this type of bushland directly clashes with its use by our local fauna and the quieter bushwalking and wildlife watching carried out presently.



We are also concerned at the suggestions relating to economic exploitation of bushland made from time to time in the GSC plan and the District Plan. WEPA believes that the leasing out of public bushland sets up complex problems in terms of balancing environmental with development needs. WEPA would not like to see our bushland and national parks treated as assets for commercialisation. Private leasehold of areas within bushland and clearance for hotels or other forms of accommodation are not supported.

In summary, WEPA supports the concept of the Green Grid but believes its objectives need to explicitly include the principles of maintaining and enhancing biodiversity and areas of high environmental value. We are also supportive of the recommendation made by the GSC Environmental Panel in its [Advisory Paper](#), to establish a Green Grid Trust, to identify, acquire, manage and prevent alienation of land that has significant biodiversity values.

### **Biodiversity Offsets**

In Sustainability Priority 4, the District Plan makes reference to the use of offsets in protecting biodiversity. WEPA believes that the GSC should press for the strengthening of the rules around biodiversity offsetting in line with the critique provided in the recent Nature Conservation Council report *Paradise Lost: The weakening and widening of biodiversity offsetting in NSW, 2005-2016*. Development and offsets should not occur in areas of high biodiversity value. Any biodiversity offsets scheme used should be on a strict like-for-like basis and exclude supplementary measures such as cash payments.

### **Saving our Bush**

WEPA believes that there are a number of ways in which the District Plan can assist further in protecting and even expanding our bushland and biodiversity. These include:

- identifying and mapping potential habitat eg determining potential wildlife corridors and degraded sites suitable for rehabilitation;
- seeking change under the new *Crown Lands Management Act 2016* to ensure that any Crown Lands containing green space that is transferred to a local council must be the subject of a special reservation prescribing its retention for that purpose in perpetuity;
- ensure critically endangered ecological communities, even those in 'pocket parks' or on school grounds (such as the Blue Gum High Forest in the grounds of Chatswood High School) are protected as Nature Reserves. These reserves are isolated pockets that are often encroached on by housing and other infrastructure developments. Bushland buffers need to be maintained around these endangered forest areas;



- setting standards with local councils to stop the clearing of allotments from boundary to boundary and allowing for sufficient landscaping to permit growth of at least one deep-rooted tree;
- identifying and preserving the habitats and hollows utilised by endangered fauna; and
- ensuring the protection of long views and scenic outlooks in reserves and along ridge lines.

### **Tree policy and canopy cover**

In Sustainability Priority 5, the District Plan alludes to the extent to which trees and a canopy cover will assume far greater importance for a changing climate – in countering the heat island effect, moderating temperature and microclimate, stabilising soil and providing habitat and wildlife corridors. Trees also improve air quality, visual and landscape amenity and providing simple enjoyment thus contributing to liveability.

Recent Government policies, such as the 10/50 rules, have led to staggering tree losses which demonstrate a lack of understanding of the functions provided by trees and should not be allowed to continue. The draft Medium Density Housing Code will also have a deleterious impact on community involvement in decision-making about the environment and on the preservation of green space and urban tree cover. The Department of Planning has been reviewing the Urban Bushland SEPP 19 that defines protection of trees and urban bushland for well over a year. It would have been of assistance to know what it will cover and how it will fit in with the District Plan. In its absence, WEPA suggests that District Plans need to develop targets, key performance indicators and direct actions to increase canopy cover across areas. Street trees and trees on private property are valuable and should be protected by local authorities (as they are within the current WCC Tree and Bushland Preservation Order). In addition, Councils should be required to prioritise native tree species for open space and urban tree planting. Plans for underground cabling should be progressed to allow trees to grow into their natural forms and to facilitate the planting of further trees.

### **Performance Indicators**

The recommendations made by the North District Plan in relation to biodiversity and the natural environment would be greatly strengthened by the commissioning of bench-marking research and the identification of performance indicators for biodiversity conservation, liveability and sustainability. Indicators for Councils and the GSC Districts to report against might include the:

- percentage of tree canopy cover;
- percentage of restored habitat for endangered species;
- total area of threatened species habitat;
- area of green space in square metres per person;



- area of green space provided by new developments relative to the number of new residents;  
and
- local green space within a 10 minute walk.

### **Built and Cultural Heritage**

WEPA has noted that in the recent reworking of the planning strategy for Willoughby, which we understand has been informed by the draft District Plan, heritage conservation areas have not been excluded from rezoning and development. These areas were developed with community consultation over extended periods of time – they are designed to protect and retain the valued natural, built and cultural heritage which speaks to our community's sense of place. WEPA believes that District Plans should actively seek to identify, recognise and protect heritage items and Heritage Conservation areas from demolition and/or inappropriate development in order to maintain the distinct character of local areas and the sense of place of residents.

Please feel free to contact me if further information is required in relation to WEPA's submission.

***Dr Meredith Foley***

***Hon. Secretary, WEPA Inc***

***0438 890 902***

[mfolwil@bigpond.net.au](mailto:mfolwil@bigpond.net.au)

<http://www.wepa.org.au/>