



Director Urban Renewal
NSW Planning and Environment
GPO Box 39
Sydney NSW 2001

30 January 2016

Dear Sir/Madam

Objection to Urban Renewal Strategy for the Sydenham to Bankstown Metro Corridor

The Hurlstone Park Association (HPA) was formed in 2014 in response to growing community concerns about overdevelopment impacting residential areas of our small quiet suburb. We represent a diverse and growing cross section of our local community with a reach of well over 500 residents through e-mail and social media channels.

On behalf of the HPA, I am writing to object to the draft Urban Renewal Strategy for the Sydenham to Bankstown Metro Corridor, in particular as it relates to the suburb of Hurlstone Park and the area of Hurlstone Park currently excised to the Canterbury Precinct on the Strategy drawings.

Key issues of concern are provided below.

1 - Community consultation

The Urban Renewal Strategy proposes an additional 36,000 new dwellings along the corridor. The Strategy will almost double the population in the corridor over the next 20 years.

This quantum of urban consolidation will have significant and far reaching impacts on the diverse existing communities located along the corridor. The consultation undertaken to date appears ad hoc and is completely inadequate considering the size of population and the level of potential impact on the communities affected.

The HPA organised a community meeting in Hurlstone Park on 24 October 2015. The purpose of the meeting was to make the local community aware of the Strategy. Despite short notice, the meeting was extremely well attended with well over 250 participants. This attendance rate demonstrates the high level of interest in the Strategy. For many at the meeting, it was the first they had heard of the proposed rezoning and there was considerable shock and anxiety expressed at the sheer scale of potential development and lack of consultation. It is unacceptable that the Department has left it to local community groups to increase the awareness of such a significant Strategy.

The additional information session provided by the Department in Hurlstone Park is acknowledged as is the extension of the public exhibition of the Strategy until 31 January 2016. However, a considerable portion of the extension of the exhibition period has been over the Christmas/New Year summer holiday when many people are away. Most Council senior staff take annual leave and Council meetings are not held.

Numerous formal requests have been provided to the Department from State Members of Parliament, the HPA, Canterbury and Marrickville Councils and the public to extend the exhibition period until well after 31st January 2016 and to engage the community in genuine consultation. These requests have been unheeded. Again this is unacceptable. Notification of the Strategy advising individual households and businesses along the corridor plus a series of genuine consultation workshops held with the three main Councils affected, local interest groups and the community prior to the close of exhibition should have been the bare minimum provided as a consultation process.

A particular issue that the Department needs to address is that there is a very high proportion of the community living along the corridor that are either non English speaking or have English as a second language. A consultation Strategy that both informs and engages these people is required. Providing a translation of summary documents in a few languages well after the exhibition period started is not remotely adequate.

Another issue that the Department has failed to address is consultation with older citizens that are technically challenged by the large number of online documents and the submission process. This issue needs to be addressed as many of our older residents are very anxious about the proposed development and feel disenfranchised and powerless to voice their concerns.

2 - Proposed redevelopment strategy

Hurlstone Park is a green suburb characterised by consistent streetscapes comprising attractive and well built homes with generous front setbacks and landscaped gardens. These homes, which date from the Federation period onwards, provide a quality environment for the diverse families that live in our suburb.

With the exception of the shopping centre, the suburb is almost entirely single storey dwellings. A small proportion of the land is low rise two storey multi-residential dwelling housing with most of these complexes tucked away and so do not detract from the predominant landscape of family homes.

The Urban Renewal Strategy proposes the rezoning of residential streets around Hurlstone Park station to allow for residential apartments of up to 7 storeys in height and up to 8 storeys in the south eastern quadrant of Hurlstone Park near Canterbury station. In determining the extent of the upzoning, the constraints mapping that was undertaken to inform the Strategy has largely been ignored and the only factor that appears to have been considered is the distance from the station. This blunt and simplistic approach would result in the demolition of hundreds of fine homes, destruction of quality streetscapes and displacement of families, many of whom have lived in the area for decades and cared for and indeed restored the period buildings in the suburb.

It would also mean that single storey homes will be immediately adjacent to 5, 6, 7 and 8 storey buildings. The level of disruption during construction, disproportionate size of the new buildings and potential overshadowing will negatively impact on any single storey houses left in such rezoned areas. Existing residents will be forced to leave.

The HPA is not anti-development. However, an urban renewal strategy that identifies development opportunities on redundant land rather than one that anticipates the destruction of quality homes should be prepared. Within the suburb of Hurlstone Park and its environs, the proposed increase in dwelling numbers could readily be achieved if the Strategy took into account the development potential of the following areas:

- Hurlstone Park retail precinct centred on Crinan Street. The HPA would welcome revitalisation of this precinct.
- Canterbury and New Canterbury Road corridors where significant redevelopment is already oc-

curing. It is noted that under the Canterbury LEP 2012 the development potential along these roads is greater than proposed in the Strategy.

Over the past five years, 2,500 dwellings have been approved and are currently being built in the Hurlstone Park and Canterbury suburbs. These dwellings need to be included in the Strategy dwelling forecasts.

The Marrickville Council side of New Canterbury Road is not included in the Strategy, despite the fact that it is less than 700m from Hurlstone Park Station and is zoned for high density mixed use. There is currently significant redevelopment occurring along this stretch of road, which should be acknowledged within the Strategy and the figures included in the dwelling forecasts.

Canterbury Race Course, which is privately owned and has the potential for a large number of additional dwellings (various sources have indicated in the order of 2,000 dwellings). This site is very large (38 hectares) and is close to Canterbury Station. It is inevitable that this site will be redeveloped for housing, similar to other areas like Harold Park. Given that the Strategy is a long term vision for the corridor, the site's development potential should be included in the dwelling forecasts.

- Sydenham Station precinct. It is noted that there is very little upzoning proposed within this precinct. Whilst it is acknowledged that this area is subjected to aircraft noise, other similar areas in Mascot have been recently upzoned. Hence Sydenham and its environs should be investigated further due to the significant quantity of brownfield sites that could be converted to residential apartments as well as commercial premises providing employment.
- The use of airspace above stations for commercial and residential development has been indicated as a possibility in media articles discussing the current State Governments policies. However, this has not been included as a scenario in the current Strategy. If such development were to occur, it would need to take into consideration the heritage constraints at some stations such as Dulwich Hill, Hurlstone Park and Canterbury.

3 - Heritage value

Hurlstone Park represents a bygone era of suburban residential charm. Most of the land is occupied by single dwelling houses (about 60% separate and 8% semi-detached; units comprise about 25%).

Most of the houses in the suburb were built around Federation or post World War I. Many of these period homes have retained original features and have been well maintained over the years.

The HPA is currently advocating for the suburb of Hurlstone Park to be made a Heritage Conservation Area.

Canterbury Council has previously expressed an interest in the heritage value of Hurlstone Park. On 25 October 2012, Council resolved to include in a Heritage Study, the options of amending Canterbury LEP 2012 in order to zone Hurlstone Park to an equivalent of a 2(a) Residential zone and where appropriate to zone some areas of Hurlstone Park to a Heritage Conservation Area similar to that of Ashbury.

Whilst the outcomes of the Heritage Study referred to in the Council resolution have not been released, it would appear that the Strategy's proposed demolition of large areas of Hurlstone Park contradict the intent of the resolution.

The Strategy fails to acknowledge and protect heritage items such as Canterbury Post Office,

Beulah Vista, St Paul's Church and the Sugar Mill¹ in both Canterbury and Hurlstone Park. These items have been included under rezoned areas such as main street shop top housing, low rise (2-4 storey) housing and even medium (8 storey) housing. The Strategy must be rectified.

One of our members has undertaken a study on the potential heritage value of Hurlstone Park. The study includes a pictorial survey of all of the period homes in the suburb. The report is available at <http://heritagehurlstonepark.org/>

4 - Precinct mapping

Approximately one quarter of the suburb of Hurlstone Park has been excised from the Hurlstone Park Precinct Plan and included in the Canterbury Precinct Plan.

The HPA has two main issues with this aspect of the precinct mapping:

- The Strategy proposes upzoning a large portion of this excised area with medium and high rise housing (up to 8 storeys). It is assumed that the rationale for the upzoning is proximity to Canterbury Station, rather than any other factor. This results in an increased impact on our small suburb as it is affected by proximity to two train stations and not just one.
- It makes it impossible to understand the demographics and economy section and the growth forecasts contained in the Strategy for the Canterbury and Hurlstone Park precincts. For example, do the growth forecasts for the suburb of Hurlstone Park include the section within the Canterbury precinct?

The population and dwellings number within the document for Hurlstone Park and Canterbury suburbs are significantly different from the ABS 2011 census upon which they are supposed to be based and use different boundaries of analysis. This gives us little faith in the demographic figures used and associated forecasts.

5 - Dwelling forecasts

The population of Hurlstone Park is already increasing due to demographic changes and the large quantum of redevelopment along the Canterbury and New Canterbury Road corridors.

The projected growth forecasts in the Strategy rely on population and housing data from the ABS 2011 census, which is now out of date. For example over the past 5 years significant changes to the demographics of our suburb have occurred. Most of the recent sales of single homes have been either deceased estates or empty nesters. Families with children are buying into the suburb, taking advantage of the attractive homes and gardens and lower house prices for family homes compared to other more expensive areas closer to the city such as Dulwich Hill and Summer Hill.

An example of the level of growth in families in the area can be seen at the public primary school for the Hurlstone Park catchment, which is located on Church St within the Canterbury Station Precinct – Canterbury Public School. Five years ago the school only had one kindergarten class – approximately 20 children. This year it will have 3 kindergarten classes – approximately 60 children.

A significant level of mixed use development is currently being constructed along the Canterbury and New Canterbury Road corridors.

The growth forecasts in the Strategy for Hurlstone Park under estimate this growth. For example, on the Canterbury Council side of New Canterbury Road alone, we calculate that 286 new dwellings have been approved, are under construction or are in the pipeline. It is noted that this number does not include the new dwellings on the Marrickville Council side of New Canterbury Road.

¹ <http://www.canterbury.nsw.gov.au/Building/Heritage-in-Canterbury/Heritage-List>

286 new dwellings represent 97% of the Strategy's predicted growth rate for Hurlstone Park by 2026.

Given the exponential growth that is already occurring in Hurlstone Park, surely the existing high quality homes do not need to be demolished to provide more housing.

6 - Infrastructure needs

The Strategy identifies that new infrastructure in the form of hospitals, schools, public transport, roads, walking and cycling upgrades, community facilities, open spaces and services utilities (sewer, water, electricity and gas) will be required to support the projected growth within the rail corridor. However, the Strategy fails to satisfactorily identify appropriate mechanisms for the delivery of this infrastructure.

In many cases the current infrastructure isn't coping with existing community needs, let alone the development that is about to come online or the growth projections. For example, Canterbury Road is virtually at a standstill now during peak traffic periods. The existing road network will reach gridlock with the growth forecasts.

The existing stormwater system is frequently overloaded in Hurlstone Park and many residents have noted sewage contamination during severe storms.

The existing Council run childcare centre in Hurlstone Park currently has a waiting period of over two years and there is no indication of extension or duplication of this facility.

Also, the Metro line upon which the need for the rezoning is partially based (in terms of increased patronage to make a new private rail line economically viable) will only be ready by 2024 according to the Strategy documents. Before being completed nearly half of the 36,000 additional homes along the corridor are expected to be constructed. With the original rail network being closed and the new Metro network being constructed for a number of years there will be an unspecified period when the rail network will not be accessible to a large number of commuters along the corridor. The logistics of this need to be considered in the Strategy.

If the level of development proposed along the corridor goes ahead the community needs iron-clad guarantees from the State government that the necessary infrastructure can be delivered for a population that is expected to almost double over the next 20 years. Much of this infrastructure needs to be put in place now to cope with the significant level of development that is about to come on line due to the explosion of development in the last 5 years.

7 - Next steps

From a meeting with the Department's urban renewal team on 12 January 2016, the HPA understand that community workshops will be held in mid to end February 2016 on 'specific issues'. The Hurlstone Park and Canterbury workshops will likely be combined due to overlapping issues. We request that the HPA be invited to attend these workshops and at a minimum our concerned residents who have made submissions. Please note that many of the residents that have made submissions have English as a second language and this will need to be taken into consideration in a workshop environment.

Further, it is also understood that it is likely that the Strategy will be amended following the public exhibition of the draft Strategy and the workshops. The HPA requests that the amended Strategy be placed on public exhibition prior to its finalization. This will allow the large proportion of the population directly affected by the Strategy to view and comment on the revised plans. This re-exhibition should also be combined with a comprehensive consultation process that both informs and allows engagement of the diverse population affected, including those of non English speaking background, have English as a second language or have technology barriers.

We look forward to working with the Department and community to develop an urban renewal Strategy that will identify development opportunities rather than one that will negatively impact on our small suburb.

Yours sincerely

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