



**Greater Sydney Commission**  
**Draft District Plans**  
PO Box 257 Parramatta 2124

[engagement@gsc.nsw.gov.au](mailto:engagement@gsc.nsw.gov.au)

**SUBMISSION - GREATER SYDNEY COMMISSION**  
**DRAFT NORTH DISTRICT PLAN**

The Mosman Parks & Bushland was founded in 1964 when bushland at Bradleys Head was threatened with destruction. Our members have continued to be actively involved in environmental protection and urban planning activities. Our objectives remain the protection and preservation of parks, bushland and open space in Mosman for the benefit of present and future generations of residents and visitors.

Our submission is informed by our belief that parks, bushland and open space have a vital role to play in preserving biodiversity and a public value in enhancing psychological and physical well being. These needs will only increase as population density increases.

We recognise the benefit of strategic planning for Greater Sydney and in particular for the Northern District and for the Harbour.

**SYDNEY HARBOUR NEEDS A PLAN OF ITS OWN**

We have identified two overarching issues. These are:

- 1. The challenge to resolve the increasing pressure on Sydney Harbour from urban development that seeks to capitalise on a harbour foreshore location: and**
- 2. Identifying ways and means to manage the harbour as a whole. This includes Middle Harbour, the Parramatta River and Lane Cove River Catchments.**

The issues raised above are not just local issues, though they do impact our local area. They go to matters of regional and more importantly of National significance.

There are additional issues stemming from these overarching issues that require consideration.

**Sydney Harbour is a key icon**, loved by Sydney siders and the admiration of tourists. Mosman Parks & Bushland Association believes that the protection of the Harbour is of sufficient importance to justify **a further Plan** to be superimposed on the existing Draft District Plans. Such a plan would extend around the entire harbour and take account of the Blue Grid and water management of other waterways of Greater Sydney.

### **Northern District excludes the Harbour**

The definition of the Northern District is defined by the land. Other than in the Pittwater area the Harbour and other waterways are excluded. This is a major shortcoming and must be rectified if the waterways and areas that adjoin them are to be protected.

Planning for Sydney Harbour and its management is complex. Its shape and topography mean that simplistic, generalised controls will not work.

### **Some of the harbour's assets which require planning and management:**

- Its sloping foreshores
- Control of run off especially if there is an increase in hard paved areas
- The need for Scenic Protection Areas
- The scale of development allowed
- Ratios of built area to landscaped tree cover
- Protection of flora and fauna
- Maintenance of views **from** and **across** the Harbour and public views **to** the harbour
- Harbourside public open space and public access which increases as population density increases and with the growth of tourism:
  - Protection, maintenance and additions to harbourside access and walkways
  - Intensification of use of public open spaces brings pressures - to upgrade and expand facilities including sports facilities, restaurants and marinas and to provide more car parking. Taronga Zoo is a case in point.
- Aboriginal Heritage around the harbour is a unique and special asset needing protection and interpretation
- Harbour ferries are symbolic and have great tourist potential

The harbour in particular, but also Northern District waterways and the bushland that adjoins them are most attractive to developers and home buyer/owners wishing to maximise harbour or bushland views with windfall gains guaranteed.

In Mosman the LEP has provisions for a foreshore building line and for development in foreshore scenic protection areas.

We contend that high level policies such as those in the Northern District Plan will not achieve what the detailed controls (quoted below) of the Mosman LEP can.

Relevant sections from the LEP.

#### 6.3 Foreshore building line

(1) The objectives of this clause are as follows:

- (a) to ensure that development in the foreshore area will not impact on natural foreshore processes or affect the significance and amenity of the area,
- (b) to protect the natural landform and landscape of the foreshore,
- (c) to contribute to a bushland and wildlife corridor around the foreshore of Mosman and enhance local native vegetation growth,
- (d) to protect the visual amenity and public view of the foreshore,
- (e) to protect dwellings from potential sea level rise.

(2) Development consent must not be granted for development on land in the foreshore area except for the following purposes:

- (a) the rebuilding of an existing building wholly or partly in the foreshore area,

3.

(b) the erection of a building in the foreshore area, but only if the building is at or below the existing ground level, and if the levels, depth or other exceptional features of the site make it appropriate to do so,

(c) boat sheds, sea retaining walls, wharves, slipways, jetties, waterway access stairs or swimming pools.

(3) Development consent must not be granted under subclause (2) unless the consent authority is satisfied that:

(a) the development will contribute to achieving:

(i) the objectives for the zone in which the land is located, and

(ii) the objectives of this clause, and

(b) the appearance of any proposed structure, from both the waterway and adjacent foreshore areas, will be compatible with the surrounding area, and

(c) the development will not cause environmental harm, such as:

(i) pollution or siltation of the waterway, or

(ii) an adverse effect on surrounding uses, marine habitat, wetland areas, flora or fauna habitats, or

(iii) an adverse effect on drainage patterns, and

(d) opportunities to provide continuous public access along the foreshore and to the waterway will not be compromised, and

(e) any historic, scientific, cultural, social, archaeological, architectural, natural or aesthetic significance of the land on which the development is to be carried out and of surrounding land will be maintained, and

(f) in the case of development for the rebuilding of an existing building wholly or partly in the foreshore area, the rebuilding will not have an adverse impact on the amenity or aesthetic appearance of the foreshore.

#### 6.4 Scenic protection

(1) The objectives of this clause are as follows:

(a) to recognise and protect the natural and visual environment of Mosman and Sydney Harbour,

(b) to reinforce the dominance of landscape over built form,

(c) to ensure development on land to which this clause applies is located and designed to minimise its visual impact on those environments.

(2) This clause applies to land identified as "Scenic Protection Area" on the [Scenic Protection Map](#).

(3) Development consent must not be granted to any development on land to which this clause applies unless the consent authority is satisfied that:

(a) measures will be taken, including in relation to the location and design of the proposed

development, to minimise the visual impact of the development to and from Sydney Harbour, and

(b) the development will maintain the existing natural landscape and landform.

Mosman Council fought to to retain these provisions and unfortunately, they are not permanent at present. Detailed provisions such as these must be retained and applied to other sections of the harbour if it is to retain its beauty and iconic status.

Turning now to the

### **DRAFT NORTH DISTRICT PLAN , Co-creating a Greater Sydney**

From "Our vision – North District 2036"

*"The North District's expansive national parks, natural waterways and beaches, and its vibrant, connected and productive centres, will interact to create opportunity and amenity."*

The quality of the Northern District is defined by its extensive waterways and its bushland.

Waterways: The Lane Cove River and its catchment

Cowan Creek and its catchment

Northern parts of the Hawkesbury River and its catchment

Middle Harbour and its catchment

The significant bushland areas – National Parks, regional parks, nature reserves.

These qualities should be acknowledged upfront in the descriptor of the District, not lost in the body of the plan.

From "Achieving – our priorities"

*"The District's natural landscape, biodiversity and waterways are real assets and create an attractive backdrop for the District. While protecting these areas we also want to look at how we can attract more visitors and provide easier walking and cycle access to coastal and harbourside areas."*

1. Cycle and walking tracks will bring excellent health benefits, but we feel that this plan is inclined to overlook the pleasure that passive recreation brings.

2. It is important that increased visitation does not degrade these natural assets. Conservation and preservation come first.

### **Comments on some of the Sustainable City Priorities**

- protecting the North District in its landscape

The protection of biodiversity must be core and inalienable. Without that protection as the basis, all other priorities lack viability.

Every bit of bushland and open space is significant and its significance increases as we densify. At present many green spaces around greater Sydney are under pressure from residential development and infrastructure.

- protecting the District's waterways

A specific waterways plan is needed for Sydney Harbour and for the other District's other waterways

- maintain and improve water quality and waterway health

Increased density is likely to mean more hard surfaces and increased run off.

Increased population results in more waste that has to be trapped.

- protect and conserve the values of Sydney Harbour

(cf our suggestion for a superimposed additional Plan)

- enhance access to Sydney Harbour foreshore and waterways

The challenge here is to balance access to the harbour and waterways with support for the waterways and adjoining bushland areas. Increased demand for boat moorings, marinas, storage facilities should be carefully controlled, transparently managed and should not limit access to sections of the public.

- managing coastal landscapes

- protecting and enhancing biodiversity

The value of biodiversity is intrinsic and its protection is imperative. The health of our community is dependent on the health of these natural areas. Increased dwelling density means that communities will need to access these spaces for rest, relaxation, solace and relief from the stresses of an urban environment.

Strong planning laws are needed to ensure the protection of all existing natural areas, be they national parks, nature reserves, crown land or unmade roads.

District planning instead of site by site management may be able to discover ways to increase connectivity by linking bush sites.

- Avoid and minimise impacts on biodiversity

i) We note (5.5 P 131) that protection brings a range of social and economic benefits such as opportunities for tourism and recreation and 3.9 in Productive City – Growing the tourism economy – has a number of actions for managing the visitor economy. Biodiversity is fragile. It must be protected before it is exploited.

5.

Visual amenity and public enjoyment are also at risk if large, commercial outlets become a feature of our natural assets.

ii) 5.5 P 132/3 Offsetting as compensation for biodiversity loss due to development. Any loss of biodiversity, habitat or threatened species is likely to be irredeemable and particularly so when a like for like offset is not possible.

iii) Asset Protection Zones should not extend into public land

- delivering Sydney's Green Grid

i) For the sake of biodiversity the green grid should aim to increase bushland to increase connectivity.

ii) All public land, no matter how degraded, should be kept and used for public benefit. It should never be sold. An opportunity to use it as part of the Green Grid should be taken if possible, reinstating it as bushland best of all.

iii) Only low impact walkways should be constructed through bushland. Mosman Parks & Bushland recognises the value of cycling for health and conveying people to natural places. However, cycleway construction and use in bushland are damaging to natural values and habitat.

- iv) We lack sufficient local knowledge of the priority projects for the Green Grid to comment on them.
- Align strategic planning to the vision for the Green Grid

As the map is still unavailable it is impossible to comment.

- protect, enhance and extend the urban canopy  
Preserving mature trees and planting new trees for reducing urban heat islands, for visual beauty and for cleaning the air is approved.  
Native species should be considered for their contribution to vegetation corridors.

Safety fears have caused the loss of trees in school playgrounds.

Appropriate choices and good maintenance should encourage their replacement or retention.

Urban development should observe SEPP 65 for the provision of soil for root space for large trees

- improve protection of ridgelines and scenic areas

Supported.

- managing the Metropolitan Rural Area
- discourage urban development in the Metropolitan Rural Area
- consider environmental, social and economic values when planning in the Metropolitan Rural Area
- provide for rural residential development while protecting the values of the Metropolitan Rural Area
- Creating an efficient North District
- support opportunities for District waste management
- planning for a resilient North District

i) To the comprehensive list of hazards we would like to add the necessity of including community green spaces in the urbanised areas, especially in any new development. These will mitigate against heat islands and will increase psychological well-being.

### **Implementing and monitoring actions**

Page 3 IM4 – improving the understanding of the plans with Councils.

This understanding needs to be two way. The GSC must also consider and respect the effectiveness and importance of local planning controls before these are abandoned as too detailed. In Mosman, as stated above, the foreshore building line and

6.

foreshore scenic protection areas must be retained in the local plan to ensure adequate protection. The need for this lies in the great diversity of topography in our harbour and waterways. This requires detailed knowledge, controls and assessments, not blanket statements.

Other advantageous monitoring action would be the creation of the dashboard for taking baseline then regular measurements to monitor progress of environmental targets eg Flora and Fauna studies.

Mapping of the Green Grid needs to be achieved.

We appreciate the informative community consultations you have held over recent months and we thank you for the opportunity to comment.

A handwritten signature in black ink that reads "Kate Eccles" followed by a long horizontal flourish.

Kate Eccles  
President  
31<sup>st</sup> March, 2017