

## Submission

Bayside West Precinct - Arncliffe, Banksia and  
Cooks Cove Draft Land Use Infrastructure Strategy

14-22 Loftus Street, Turrella

Submitted to Department of Planning and Environment  
On Behalf of Property NSW and the Department of Education

SUITE 6.02, 120 SUSSEX ST, SYDNEY NSW 2000  
TEL +61 2 8270 3500 FAX +61 2 8270 3501 [WWW.CITYPLAN.COM.AU](http://WWW.CITYPLAN.COM.AU)  
CITY PLAN STRATEGY & DEVELOPMENT P/L ABN 58 133 501 774



## Report Revision History

Revision	Date Issued	Prepared by	Reviewed by	Verified by
01	28/02/17	<b>Anthony Kazacos</b> <i>Senior Project Planner</i>	<b>Stephen Kerr</b> <i>Executive Director</i>	<b>Stephen Kerr</b> <i>Executive Director</i>

This document is preliminary unless approved by a Director of City Plan Strategy & Development

### CERTIFICATION

This report has been authorised by City Plan Strategy & Development, with input from a number of other expert consultants, on behalf of the Client. The accuracy of the information contained herein is to the best of our knowledge not false or misleading. The comments have been based upon information and facts that were correct at the time of writing this report.

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## 1. Summary of Submission

This submission has been undertaken for Property NSW on behalf of the Department of Education, the property owner of 14-22 Loftus Street, Turrella in response to the 'Bayside West Precinct - Arncliffe, Banksia and Cooks Cove Draft Land Use and Infrastructure Strategy' (the Strategy).

The site was purchased by the Department of Education in 1957 and has been used as a special needs school until 2016, when the school was closed and vacated.

This site has been identified as 'surplus' land by the Department of Education i.e. it is no longer required for educational land uses. Given the site's location, size and proximity to several train stations, the site is in a prime location for urban renewal.

We have reviewed the Draft Plan and supporting material currently on exhibition.

In summary, our submission concludes that the draft plan is appropriate in that it encourages growth and renewal in established areas of the Sydney metropolitan area. Specifically, our submission supports the draft plan's objectives to increase densities and allow for additional land uses such as residential and commercial.

Having regard to the unique characteristics of the site, we submit that the zoning boundary should be expanded to incorporate the remainder of the street block, and a height limit (21 metres) and FSR (1:1) should be applied which recognises the development capacity that is available without compromising the heritage significance of the site.

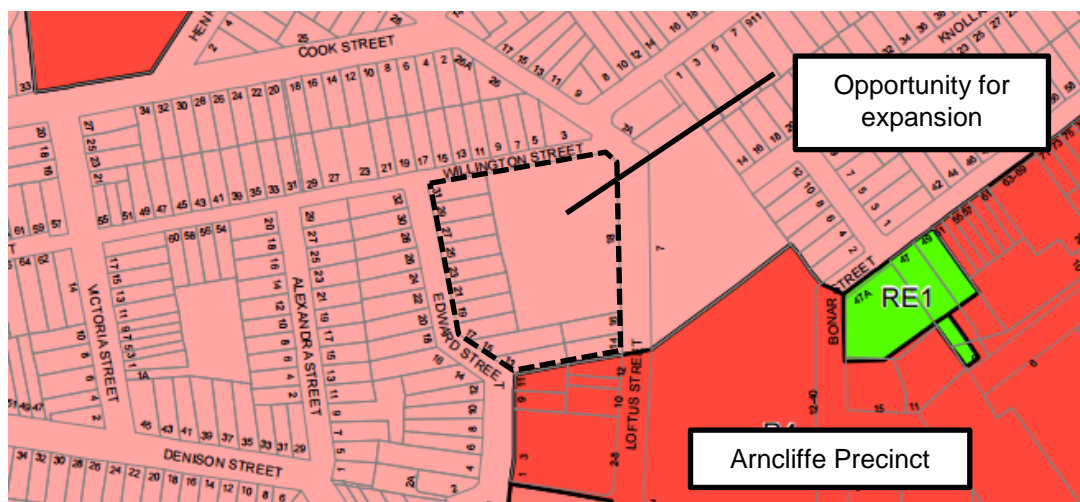


Figure 1: Proposed precinct boundary



## 2. Sites the Subject of this Submission

### 2.1 Site descriptions

As illustrated in the Figure below, the site has a street address of 14-22 Loftus Street, Turrella and is legally described as Lots 13 and 14 DP 12203 and Lot 1 DP 120192.



Figure 2: Site Location (Source: Six Maps)

The site is currently owned by the Department of Education and has been declared as surplus land and is no longer needed for educational purposes. The site is a corner allotment and a large land holding of approximately 8,900 sqm. The site's main lot and the associated vegetation has been identified by the Rockdale Local Environmental Plan 2009 as the 'Cairnsfoot School' which is a State Heritage Item. The site therefore comprises mainly school buildings and structures such as classrooms and playground equipment.

### 2.2 Surrounding Development

The site is located within the Rockdale Local Government Area (LGA) and is within a precinct currently transitioning from a low density residential and industrial suburb to a high density mixed use precinct. As outlined below, to the south-east of the site are new medium-high density residential developments within the suburb of Arncliffe.



Figure 3: New high density mixed use developments

### 3. Site analysis

The Strategy includes an opportunities and constraints analysis of the whole area subject to the Strategy. As the subject site is not included with the boundary of the Strategy we briefly outline our own 'finer grain' analysis of the site (and the surrounding area) the subject of this submission, which support the site's inclusion within the boundary of the precinct.

#### 3.1 Opportunities and constraints analysis

##### Opportunities

The site and surrounding area consists of several positive attributes which would facilitate urban renewal, including:

- **Topography:** The locality is relatively flat, with a slight elevation along Willington Street in the east-west direction;
- **Large land and dual street frontages:** The subject site comprises of a large parcel of land, on a corner allotment and with dual street frontages. This will assist in designing a well-planned development. Loftus Street is the site's main street frontage and provides direct access to Turrella Station to the site's north.
- **Accessibility and connectivity:** The locality is highly accessible to both public transportation and road infrastructure, including:
  - It is within walking distance to multiple train stations, namely Turrella, Arncliffe and the major train interchange station of Wolli Creek; and
  - On and off ramps to the M5 Motorway are in close proximity to the site. The M5 is currently being upgraded as part of the Westconnex project, which will involve the construction of new twin tunnels, providing additional capacity to the motorway.
- **Open Space:** The locality is surrounded by open space, including Arncliffe Park to the south, Cahill Park to the east, Coolibah Reserve to the west and Girrahween/Waterworth Park to the North.
- **Surrounding high density development controls:** The zone directly adjacent to the site's southern boundary allows for a FSR of 1.8:1 and an 18-metre height limit. Additional higher densities are located to the south and east, with FSRs of up to 3:1 and building heights of up to 24 metres.

##### Constraints

As outlined in the figure below, the site's main allotment is a heritage item, identified as the 'Cairnsfoot School' which is a State Heritage Item.

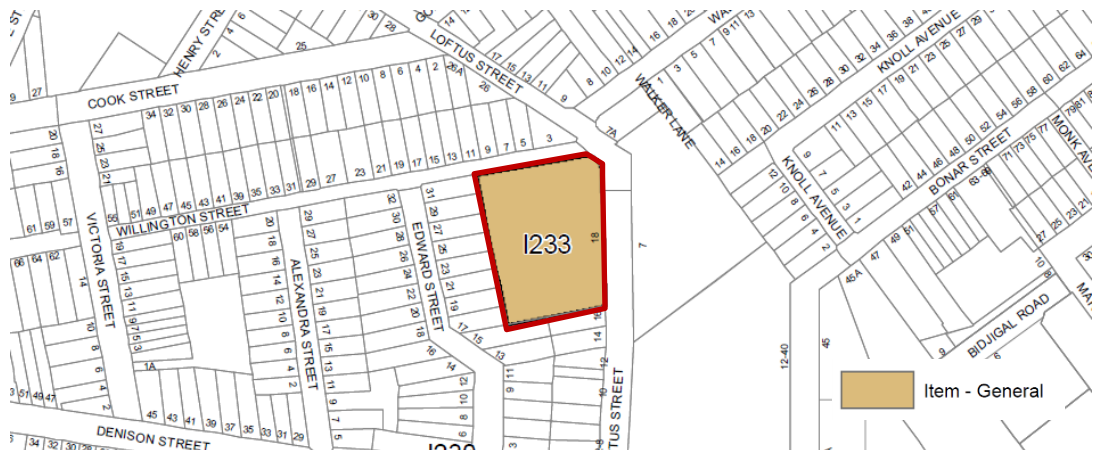


Figure 4: Heritage Map, subject site highlighted with red boundary (Source: NSW Legislation)



This classification only however relates to the school's main buildings and features. Portions of the site, therefore have the potential to be developed for other uses such as high density residential, as detailed below.

### 3.2 Summary of development potential

Underutilised government sites in established areas and which are no longer needed for their original purpose provide an opportunity for redevelopment and urban renewal.

Despite, the site's heritage listing, we consider certain 'pockets' of the site being highly suitable for redevelopment. The identified pockets have been identified in the figure below.

Development may potentially be located along the north western and south western corners of the main allotment, and potentially along the western elevation of the stables.

The remaining two lots to the south have not been identified as heritage items. Any development on these two southern lots may also extend into the site's main allotment along the south-western corner.

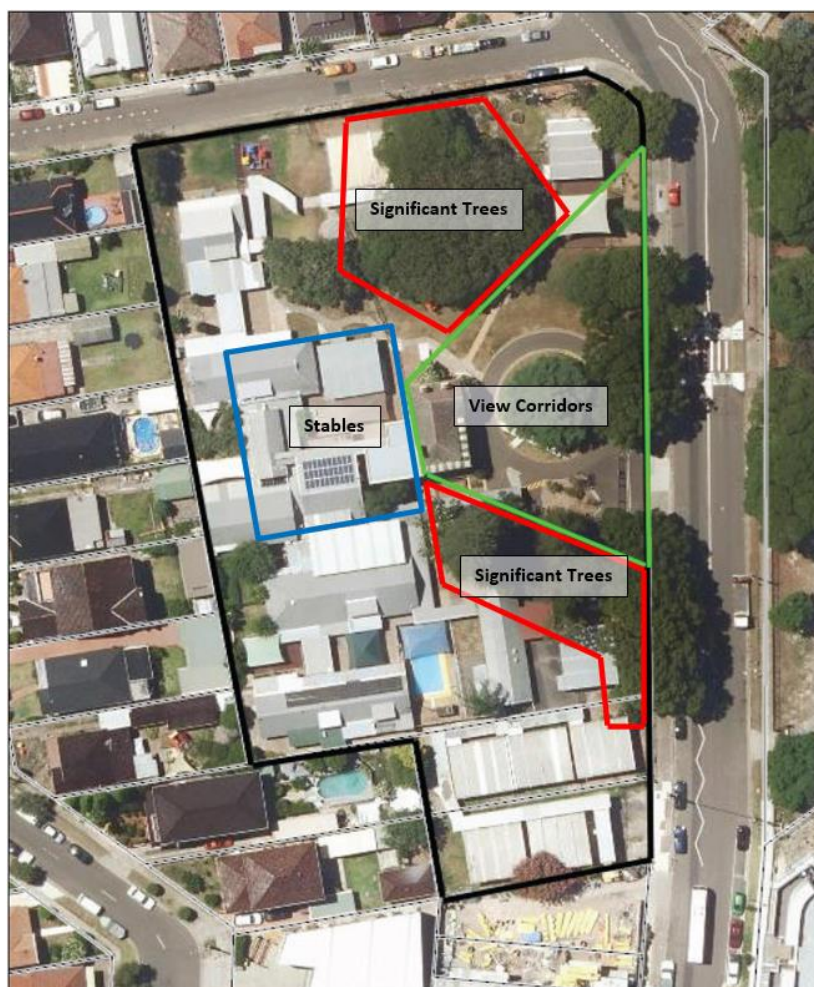


Figure 5: Indicative overview of the site's development potential (approximate locations)

### 3.3 Indicative Concept Plans

Property NSW, on behalf of the Department of Education have undertaken an extensive urban design and heritage analysis to determine how the site could be redeveloped while retaining its heritage significance.

The below provides **one** example of a potential redevelopment scenarios on the site. Careful attention has been given to the placement of the indicative building envelopes to ensure that

any redevelopment is sympathetic to the site's State Heritage status. Key features of this option include:

- Transitional heights: a transition in heights could be provided with 21 metres near the existing high density residential zones to the south of the site. A minimum height of 8.5 metres could be provided near the site's main heritage building and surrounding low density residential dwellings.
- Heritage Curtilage: building envelopes have been carefully placed to ensure that they do not interfere with the site's heritage curtilage along its Loftus Street boundary or the site's significant vegetation.
- A total of approximately 82 dwellings could be provided.

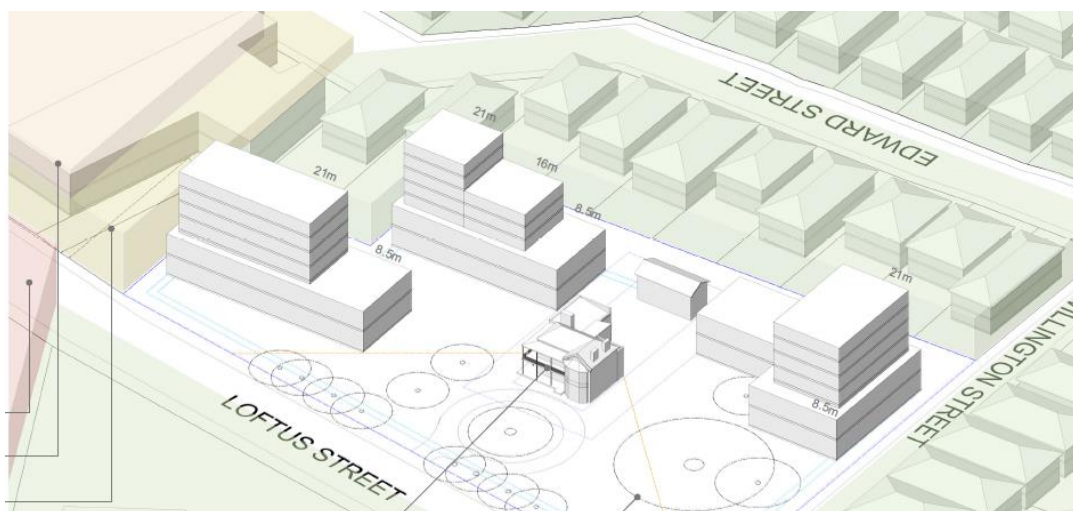


Figure 6: Indicative redevelopment scenario

As outlined below this development scenario generates minimal shadowing to the surrounding area - including the surrounding residential dwellings, significant vegetation or the site's heritage buildings



Figure 7: Potential shadowing - 12pm

It is important to note that the above are indicative only. Further input is required from the Office of Environment and Heritage to inform an overall design and layout for the site.



We understand that the Property NSW is currently preparing a Conservation Management Plan (CMP) in consultation with OEH. We understand that this is expected to be finalised by approximately June 2017.

Given the site's development potential we suggest that the site should have an opportunity to be included within the Arncliffe precinct boundary, to achieve an optimal development outcome on the site, which could not only support the ongoing conservation of the heritage item but also utilise a large government owned land holding, which is no longer needed for infrastructure purposes.

Utilising large land holdings in established areas is a government imperative and is consistent with government policy as outlined in the Section below.

### 3.3.1 Strategic planning setting

#### Central District Plan

Turrella is within the Greater Sydney Commission's draft Central District Plan.

The Draft Plan outlines residents within the District "want more affordable housing options closer to where they work and study. Any new development should enhance the appeal of the local area and deliver a diversity of housing."

Under the Central District Plan, the 2016-2021 housing target for the Bayside LGA is 10,150 dwellings or 2,030 dwellings per year over this 5-year period. As outlined in the below table the LGA over the last 5 year has a total of 1,184 dwellings being completed.

Assuming these trends continue, the Bayside LGA will not be able to accommodate the targets within the District Plans as an additional 846 dwellings per year are required.

Table 1: Gap Analysis

Annual target (2016-2021)	2,030
Average Completions (2011-2012 to 2015 to 2016)	1,184*
Gap (target - completions)	846

\*SOURCE: DEPARTMENT OF PLANNING AND ENVIRONMENT, METROPOLITAN DEVELOPMENT PROGRAM

The site therefore presents an ideal opportunity to support urban renewal in a highly accessible inner city location.

## 4. Critique of draft Strategy

As outlined in the figure below, the subject site is just outside the Arncliffe precinct boundary and is adjacent to the land identified as 'High density residential development (priority area for rezoning)' and 'Medium density, low-rise residential development (future opportunities)'

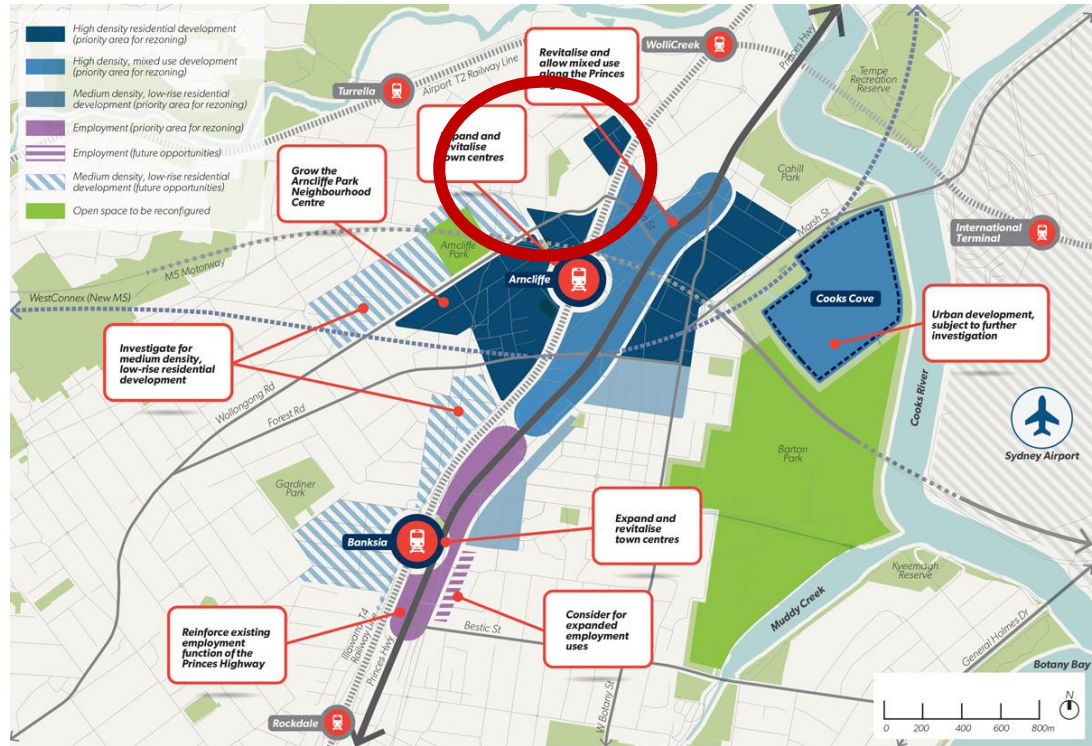


Figure 8: Precinct boundary (approximate location of subject site highlighted with red boundary)

The figures below outline a comparison of the proposed and existing building height and Floor Space Ratio (FSR) controls for the Arncliffe precinct, in relation to the subject site.

As outlined below, the subject site is already within a high-density precinct, with newly constructed residential flat buildings on the same block of land, immediately to the site's south with FSRs of 1.8:1 and 18 metre height limits.

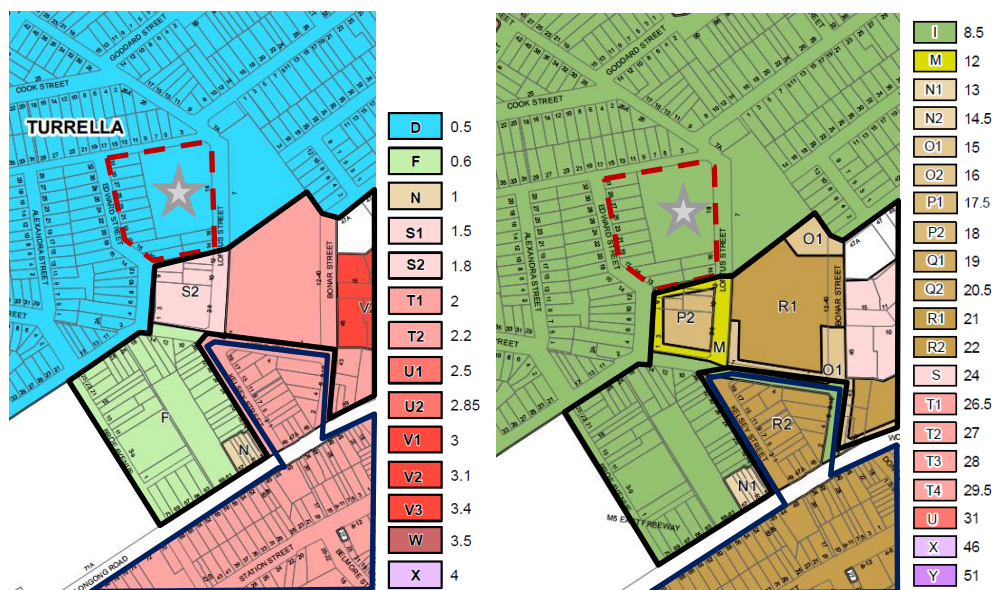


Figure 9: Planning Controls (subject site highlighted with star) Map Key: Red boundary = opportunity for further high density development. Black boundary = existing planning controls. Blue boundary = proposed controls under the Strategy.

It is unusual to have both low and high densities within the same street block. Perhaps this is due to the site previously being used as a special needs school, before recently being vacated.

Additional higher densities are located to the south and east, with FSRs of up to 3:1 and building heights of up to 24 metres.

This will only be further intensified, with the introduction of the proposed new controls, which will see further high density residential development to the immediate south of the site.

Given the block of land, which comprises of the subject site, already comprises of high-density land uses, it provides a prime opportunity for further high density residential development, which could act as a buffer to the surrounding existing low density dwellings.

To facilitate development on this block of land the following controls would be appropriate, in accordance with the zoning directly surrounding the site and having regard to the constraints imposed by the heritage item.

- Land use zoning - R4 High Density Residential;
- Building Height - transitional heights of up to 21 metres; and
- FSR - 1:1.



## 5. Recommended amendments to planning proposal

City Plan Strategy & Development, on behalf of Property NSW and the Department of Education, support the Department of Planning and Environment's strategic approach to encouraging urban renewal within the Arncliffe Precinct to accommodate population growth.

We would however, recommend the Department support even further growth. Specifically, we encourage an extension of the R4 - High Density Residential zone further north-west, in addition to revising the proposed height and FSR controls.

This would incorporate our client's site, 12-14 Loftus Street, which as previously mentioned has been identified as surplus land by the Department of Education. Additionally, the proposed boundary extension includes the remaining allotments on the same block of land which already comprise of high density land uses.

Revising these controls to increase density and height is necessary to support a financially feasible redevelopment which would facilitate urban renewal and ensure that the site's heritage item can be conserved.

We recommend the following controls are adopted:

Table 2. The proposed LEP controls

LEP	Recommended Control
Land use	R4 High Density Residential
FSR	1.1
Building height	transitional heights of up to 21 metres

Such controls could provide for positive urban design outcomes in relation to the Arncliffe precinct, whilst conserving the site's heritage status. Further, our client's site could easily accommodate a larger and taller redevelopment scenario given its generous width, generous depth, modest gradient, and single ownership structure.