

PLANNING



BUILDING



HERITAGE



URBAN DESIGN

Submission in response to the Draft Bayside West Precinct Land Use and Infrastructure Strategy

299 - 307 Princes Highway, Banksia

Submitted to Department of Planning and Environment
On Behalf of the Feros Group

SUITE 6.02, 120 SUSSEX ST, SYDNEY NSW 2000
TEL +61 2 8270 3500 FAX +61 2 8270 3501 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	Click to enter a date.	Name Surname <i>LM</i>	Name Surname <i>SK</i>	Stephen Kerr <i>Add credentials & signature</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.

Copyright © City Plan Strategy & Development P/L
ABN 58 133 501 774

All Rights Reserved. No material may be reproduced without prior permission. While we have tried to ensure the accuracy of the information in this publication, the Publisher accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in information in this publication

Table of Contents

1. Summary of Submission	4
2. Subject of this Submission	5
3. Site analysis	7
3.1 Opportunities and constraints analysis	7
3.2 Summary of development potential	8
3.2.1 Strategic planning setting	8
4. Critique of draft Strategy	9
5. Need for alternative planning controls to facilitate development	9
5.1 Recommended amendments to planning proposal	11

Figures

Figure 1. The subject site outlined in red.	5
Figure 2. The southern boundary of the subject site and open carpark on Subway Road (Google Maps).	6
Figure 3. The southwest boundary of the subject site on Hattersley Avenue (Google Maps).	6
Figure 7. The northern part of the subject site from Beehag Avenue (Google Maps).	6
Figure 5. The eastern boundary of the subject site from Princes Highway (Google Maps).	6
Figure 4 - Now closed access to a pedestrian bridge which previously crossed sub-way road. Reinstated, this bridge would provide even more convenient pedestrian access to the site.	6
Figure 6. The northwest boundary of the subject site on the corner of Beehag Avenue and Hattersley Street (Google Maps).	6
Figure 8. Indicative sketch of proposed serviced apartment development (floor layout, first floor)	7

Tables

Table 1. Length of the site boundaries for each street that the site addresses with the direction shown in parentheses. Dimensions are in metres.	5
Table 2. The proposed LEP controls pertaining to 299 - 307 Princes Highway.	11

1. Summary of Submission

This submission has been prepared on behalf of the owners of The Rocksia Hotel located at 299 - 307 Princes Highway Banksia in response to the 'Bayside West Precinct - Arncliffe, Banksia and Cooks Cove Draft Land Use and Infrastructure Strategy' (the Strategy).

The Rocksia Hotel is an integral part of the Banksia Town Centre and a popular meeting place and focal point for the community. The Hotel is also located less than 150m from the Banksia Railway Station.

The owners of the Hotel wish to develop a serviced apartment building on an underutilised portion of the site, leveraging synergies with the existing hotel kitchen. The serviced apartments would cater for business travellers and support employment uses in the area and. Redevelopment of this portion of the site would also increase activation of the street frontage and improve the presentation of the site to the Princes Highway.

To facilitate the development of serviced apartments a B4 Mixed Use Zone is required, as serviced apartments are prohibited in the B6 Enterprise Corridor Zone. The Strategy proposes to introduce a mixed use zone in the vicinity of Banksia Station to "promote renewal around the station and the provision of a new retail street on Hattersley Road, to serve the eastern neighbourhoods. The proposed mixed use zone stops at the southern boundary of the Rocksia Hotel site.

Because the site is near the Banksia railway station, and would be regarded by most as an integral part of the Banksia town centre already, it is our opinion that the B4 zone and related height and FSR controls should logically be extended to incorporate the Hotel site. This of course would also facilitate the redevelopment of part of the site for serviced apartments. Because the Hotel site is bound on all four sides by roads, the relocated boundary, therefore, would terminate at a road (Beehag Street).

2. Subject of this Submission

This submission has been commissioned by the owner of No. 299 - 307 Princes Highway, Banksia (the Rocksia Hotel). The Rocksia Hotel is a one and two - storey large food and drink premises - hotel with several bars, a function room and substantial car parking.

The site is legally described as Lot 140 DP 1133516 and is 4, 219sqm. It has street frontage on all four sides; Princes Highway to the east, which the site addresses. Hattersley Street is on the western site boundary (rear of the site), Beehag Avenue is to the north and Subway Road is to the south (Figure 1). Site dimensions on each street frontage is in the (Table 1).

Table 1. Length of the site boundaries for each street that the site addresses with the direction shown in parentheses. Dimensions are in metres.

Street	Frontage (m)
Princes Highway (east)	90
Hattersley Street (west)	100
Beehag Avenue (north)	50
Subway Road (south)	50

As indicated in Table 1, the site is rectangular and has street access on four sides. From the Princes Highway to Hattersley Street, site depth varies from about 45 to 47m. From Beehag Avenue to Subway Road site depth is about 96m. The site is in its current form takes advantage of this unique location with access from Subway road, Beehag Avenue, and Hattersley Street (Figure 2 to Figure 5). Opposite the site on the Princes Highway (to the east) are single site developments, comprising of a KFC, vacant car yard and hotel. To the north are large car yards and light industry businesses. A small park is to the south of the site.

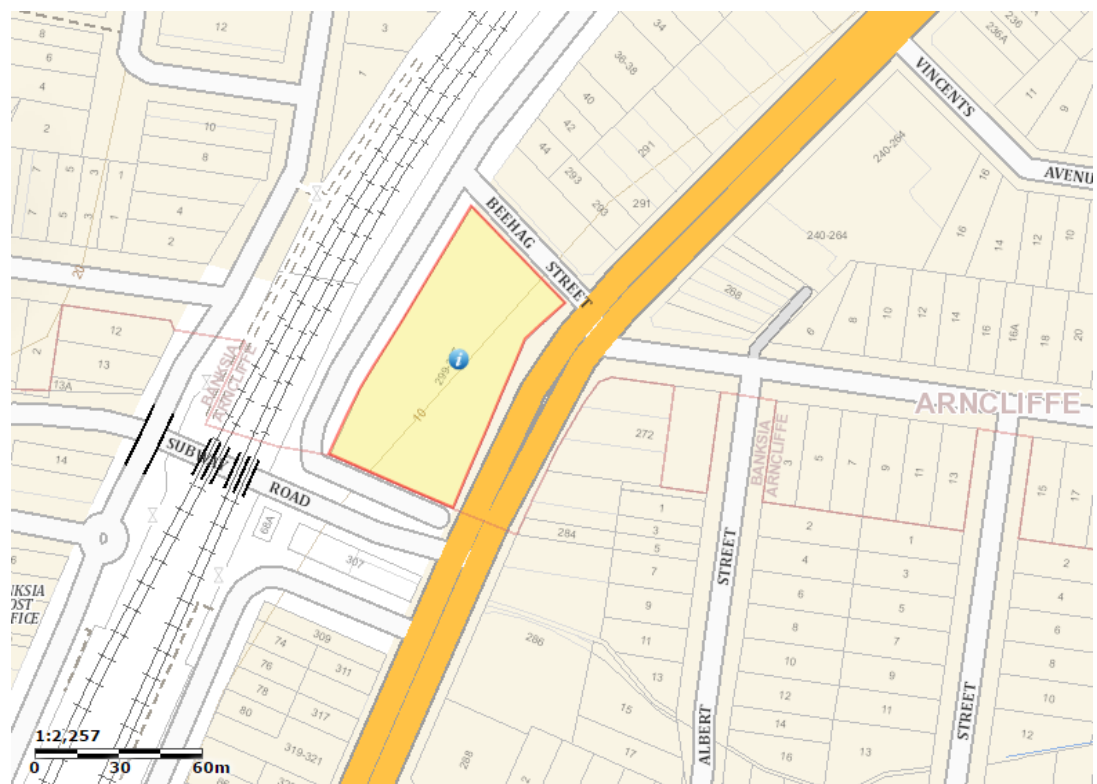


Figure 1. The subject site outlined in red.



Figure 2. The southern boundary of the subject site and open carpark on Subway Road (Google Maps).



Figure 3. The southwest boundary of the subject site on Hattersley Avenue (Google Maps).



Figure 7. The northwest boundary of the subject site on the corner of Beehag Avenue and Hattersley Street (Google Maps).



Figure 4. The northern part of the subject site from Beehag Avenue (Google Maps).



Figure 5. The eastern boundary of the subject site from Princes Highway (Google Maps).



Figure 6 - Now closed access to a pedestrian bridge which previously crossed sub-way road. Reinstated, this bridge would provide even more convenient pedestrian access to the site.

3. Site analysis

The Strategy includes an opportunities and constraints analysis of the whole area. While we accept and agree with much of that analysis, we will briefly outline our own 'finer grain' analysis of the site the subject of this submission, in the context of a specific development proposal for the Rocksia Hotel site.

The owners of the Rocksia Hotel wish to redevelop the area currently occupied by the on-grade car park to incorporate a serviced apartment development. The proposed serviced apartments would cater primarily for business travellers and would take advantage of synergies with the existing hotel kitchen. In this regard the proposal is complementary to the employment development in the area and is uniquely suited to the Hotel site. An indicative sketch is provided below (Figure 8).

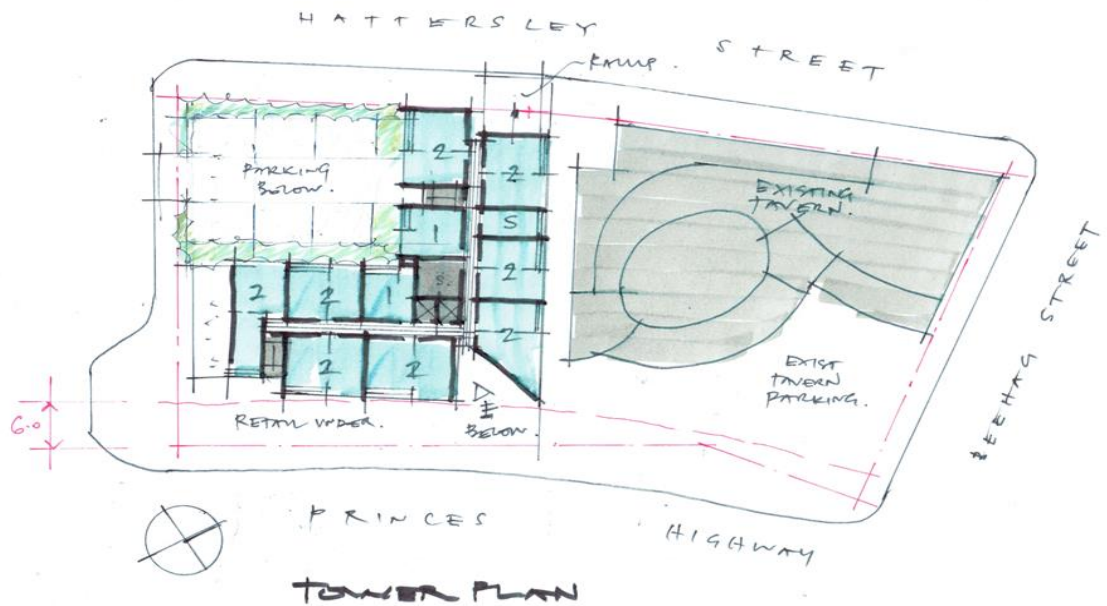


Figure 8. Indicative sketch of proposed serviced apartment development (floor layout, first floor)

3.1 Opportunities and constraints analysis

Opportunities

The site is effectively part of the existing local centre, focused on the Banksia rail station. The site is about 150m walking distance from Banksia Railway station via a level pedestrian walkway and a small urban park. From Banksia Railway Station, transport to the Sydney CBD is about 17 minutes. During peak hours, trains depart Banksia Railway Station to the Sydney central business district and Kogarah every 10 minutes. Outside peak times, trains leave Banksia every 30 minutes. The airport is only three stations from Banksia. Banksia Railway Station supports high level heavy rail and bus transport with excellent access to the city, surrounding suburbs of Kogarah and Hurstville, and is close to the airport. In addition, the Princes Highway is a dual carriage road and a major transport thoroughfare with connections to the airport and to the south of Sydney. The sites have excellent access to public transport infrastructure.

The site has a large area (4,219sqm), substantial site depth (about 50m east to west), opportunities for substantial basement car parking, with access and servicing from at least three street frontages other than the Princes Highway. The site is also located well away from 'sensitive receivers' in the form of 'medium density residential properties'; with the nearest property being about 80m west of the site across the railway line.

A large area of surface car parking provides an opportunity to increase activity on the site without disrupting the operation of the hotel.

With the exception of flood planning, the property is not subject to any heritage or other environmental constraints under the Rockdale Local Environmental Plan 2011 (RLEP), and is zoned for urban development.

ANEF levels for the site do not restrict residential developments subject to appropriate design measures to mitigate noise.

We note in the Flooding and Drainage review prepared by Mott MacDonald, the site is not within a key flood affected area and is not affected by the 1%AEP.

While the site is within the Airport Obstacle Limitation Surface (OLS), that is the maximum height of the subject site must be no greater than 42m above the AHD; this is not a restriction for mid-rise buildings up to at least 31m.

Constraints

As indicated above, while some potential constraints to the redevelopment of the site exist, including airport impacts, traffic noise and vehicular access from the Highway, these are all manageable through height limitations and detailed site and building design. As such they are not fundamental constraints to redevelopment, as demonstrated by the Strategy's proposal to allow more intensive redevelopment on the properties directly south of this site on the Highway.

3.2 Summary of development potential

The site is effectively part of a town centre, having excellent access to public transport either by train or bus at Banksia Railway Station and being a key destination in its own right. The Princes Highway also has excellent access to Port Botany, the Sydney CBD and other key employment areas. Underutilised sites, such as 299-307 Princes Highway, in established areas with such good access to transport and facilities provides an opportunity for redevelopment and urban renewal and services to support surrounding employment lands. In the absence of fundamental environmental or other constraints to its development, we consider this site as highly suitable for redevelopment.

We suggest that the site should have the opportunity to develop to its optimum economic potential that supports local market demands and is consistent with the Draft District Planning Principles. This is discussed in the next section.

3.2.1 Strategic planning setting

Central District Plan

Banksia is within the Greater Sydney Commission's draft Central District Plan. Key priorities for this district are to improve employment opportunities in service industries, finance and innovation supported by strong transport connections to Sydney Airport and Port Botany and Randwick Health and Education and a diverse housing choices that support the current and future populations. Under the draft Central District Plan, the Banksia area is identified as a priority precinct for urban renewal (p92 & 97).

Planning priorities that directly apply to the sites are:

- Protect and support employment and urban services land to increase the total number of jobs (p4); and,
- Support the development of a network of liveable centres and community hubs with good links to public transport and green spaces.

Princes Highway Corridor Strategy

Under the Princes Highway Corridor Strategy (Rockdale City Council, 2013), development in the Banksia area along the Princes Highway aims to revitalise the B6 Enterprise Corridor. To do this, Rockdale City Council resolved in 2013 to:

- Widen the range of permissible employment and service related land uses to attract new businesses to the corridor. These included more employment intensive land uses such as a food and drink premises, function centres, and industrial retail outlets.
- Allow for increased development potential for employment related land uses. In this regard, Council resolved to increase the maximum building height from 14.5 to 18 metres, and increase the density from 1.5:1 to 2.5:1.

The Council Strategy also identified that "*the rail station makes Banksia an attractive precinct for future transit orientated development.*" However, it stated that due to existing, principally aircraft noise, constraints, this role should not be pursued until the role and form of residential development can be "*considered as part of a holistic strategy for both ...sides of Banksia.*"

We submit that the current Strategy represents that "holistic strategy" and it is therefore appropriate to give serious consideration to the suitability of the subject site for transit orientated development (TOD).

4. Critique of draft Strategy

The Strategy argues that retaining the B6 zoning and FSR (1.5:1) with a 4m increase in maximum building height, is to preserve employment lands within the area and provide opportunities for large retail operations such as car dealerships and showrooms. While the precinct proposal recognises that for redevelopment to occur, development must be valuable enough to displace existing uses, it does not explain how proposing no change to existing planning controls, other than increasing the maximum building height from 14.5m to 18m, will achieve this outcome. We suggest that it will not.

As properties near the site have been vacant since September 2015, it is reasonable to assume that the existing planning controls do not support the planning objectives for the local area. Therefore, if current zoning and FSR have not stimulated redevelopment of these sites, how will retaining these controls stimulate redevelopment? Indeed, the addition of an extra storey will have little or no benefit as most of the permitted uses in the current and proposed B6 zone (such as car yards, light industries, transport facilities etc.) are unlikely to viably operate above the ground or on subsequent floors.

The proposal to develop serviced apartments on the Hotel site demonstrates the range of complementary land uses that can be legitimately associated with employment lands. To develop serviced apartments, however, not only is the B4 Zone to permit the use, the associated development standards, including a 31m height limit and 2.5:1 FSR, are required to accommodate a sustainable serviced apartment development.

5. Need for alternative planning controls to facilitate development

Land Use Zoning

For the reasons outlined above, the Strategy's proposal to retain the existing B6 zoning in its present form will not achieve its aim to revitalise Banksia. This contrasts with the Strategy's proposed mixed-use zoning directly opposite the site and other areas north of the site, around Arncliffe railway station. Much of the argument for B4 mixed - use zoning around Arncliffe applies equally to such zoning on the Princes Highway near Banksia Railway Station. That is;

"The Strategy recommends changing the land uses adjoining the Princes Highway, through Arncliffe, to allow for a wider range of commercial uses.... The purpose of this change is to encourage revitalization of the corridor, bringing additional business opportunities...."

In recommending that areas around Arncliffe are rezoned from B6 to B4, this is a clear acknowledgement that a broad array of permitted uses would contribute to generating employment through redevelopment. Indeed, the Princes Highway Corridor Strategy by Rockdale City Council (2013, p41) argued for an increased array of employment uses under the B6 land use zone with the aim of attracting new businesses to the corridor. Rockdale City Council recommended ten additional employment uses were included in the B6 zone. These uses included: amusement centres, entertainment facilities, food and drink premises (i.e. restaurants, cafes, small bars), function centres, registered club, kiosks, markets, industrial retail outlets, shops; and veterinary hospitals. While serviced apartments were not listed in Council's recommendations, such a land use would be compatible with the permitted array of land uses and these proposed uses.

Allowing serviced apartments at the Rocksia hotel site is a logical location as the site is near the Banksia rail station and facilities on the site, such as the existing food and drink premises, would support the apartments and therefore promote the employment opportunities in the Princes Highway Corridor.

However, if permitted uses under the B6 zone are not broadened, then rezoning the land use from B6 to B4 would enable the owners of the Rocksia Hotel to respond to market demands and provide further employment opportunities on the site. Whether the site is rezoned from B4 to B6 or serviced apartments are permitted in the B6 zone, allowing serviced apartments to be developed on the site would enhance opportunities for people to work close to where they live with good public transport connections. In doing so, we recommend that the local provision in the Rockdale LEP relating to street activation be applied to this site to ensure that the ground floor frontage contributes to street activation of the area.

FSR and Height

As well as proposing a change in land use, we recommend that the proposed density and height controls are also revised in order to stimulate redevelopment. The 'Princes Highway Corridor Strategy (Rockdale City Council, 2013) (p49) suggested that the maximum floor space ratio within the highway Enterprise Corridor is increased 1.5:1 to 2.5:1. Retaining the current height and FSR, for example, will not enable the proposed serviced apartments.

In terms of appropriate building height, we propose a maximum height to 31 metres

Revising height and FSR to increase density and height would facilitate redevelopment of the site and support increased opportunities for employment development.

We note the building height does not breach the OLS, which is approximately 42m above the AHD in this location.

Active street Frontages

In providing a serviced apartment development, we believe that a requirement for 'active street frontages' is essential in addressing concerns on personal safety and amenity on the Princes Highway. A proposal to include a requirement for active street frontages would help to mitigate the harsh environment of the Princes Highway and contribute to the strategy objectives of revitalising the Princes Highway Corridor. Indeed, the strategy proposes to provide a *"...tree lined road corridor with large setbacks and wide footpaths to enhance pedestrian safety and amenity."* Therefore, active street frontages are essential in promoting passive surveillance of the area, encouraging a sense of safety in an otherwise busy thoroughfare, and 'ground' the proposed building heights to a human scale of development.

5.1 Recommended amendments to planning proposal

For the reasons outlined in this submission, we conclude that to meet the aims of the Strategy to revitalise Banksia and facilitate the unique and beneficial redevelopment of the Banksia Hotel site, it is necessary to amend proposed land use and built form controls.

We recommend the following controls are adopted (Table 2).

Table 2. The proposed LEP controls pertaining to 299 - 307 Princes Highway.

LEP	Draft Strategy Control	Recommended Control
Land use	B6 Enterprise Corridor	B4 mixed use
FSR	1.5:1	2.5:1
Building height	18m	31m
Street activation	N/A	
Local provision		Local Clause: Clause 6.11 <i>Active street frontages</i> to apply all properties.