



**TOWER 2, LEVEL 23  
DARLING PARK, 201 SUSSEX ST  
SYDNEY NSW 2000**

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ABN 50 105 256 228

28 February 2017

Department of Planning & Environment  
Land Release Team  
GPO Box 39, Sydney NSW 2001

Dear Sir/ Madam

## **SUBMISSION RE: INGLESIDE PRECINCT STRUCTURE PLAN**

### **INTRODUCTION**

Urbis has been instructed to review and prepare this submission in response to the exhibited Ingleside Precinct Structure Plan on behalf of Galstaun College, located on land known as Lot 1 in DP 808703, being 5 Chiltern Road, Ingleside.

Galstaun College, is a private school for K-12 students and supporting the Armenian Community. We note that the draft Ingleside Structure Plan identifies the land for a combination of:

- Environmental conservation
- Low density residential development, and
- Public open space – sporting fields

The draft structure plan therefore contemplates the long-term relocation of the school, which we understand has been tabled with the Department / Council during earlier consultation processes. Accordingly, we have been instructed to make comment on the appropriateness or otherwise of the proposed land use mix.

### **PROPOSED STRUCTURE PLAN – GENERAL OBSERVATIONS**

The proposed Ingleside Structure Plan represents one of the lowest density urban releases seen in Sydney for many years. Whilst there are acknowledged environmental constraints arising from its undulating and dissected topography, the gross dwelling per ha of 4.85 (3396 dwellings across 700ha) rates extremely low.

When coupled with infrastructure provision, the costs of which have not been fully disclosed at this stage, raises serious questions about the viability of the release and the capacity of the development industry to meaningfully contribute to the cost of servicing the release area.

On this point the draft strategy foreshadows that there will be a subsequent exhibition of a statutory planning package including a draft SIC and draft s.94CP. It is noted that the Demographic Report included in the exhibition material foreshadows that the current \$30,000,00 / lot cap for greenfield development will need to be reviewed in finalising s.94 contributions for the release area. In other words, the demographic study predicts that there will be a significant funding shortfall for the level of local infrastructure required to properly service the release area. When combined with other

preliminary and yet to be quantified costs associated with state infrastructure, creates significant uncertainty in determining all costs

At this stage, we note from the exhibition material that over \$110m of indicative costs have been identified for water, sewer and power. Conversely, there are no costs attributed yet to the identified need for local and regional road upgrades; public transport facilities; bikeways; open space; community facilities; or trunk drainage.

It is considered essential that the Department must undertake economic assessment of the potential viability of the entire release once full development costings are determined so that the quantum of contributions can be assessed as being affordable.

Only after these costs have been established, that further economic modelling of the release be undertaken. This may require a revisitation of proposed dwelling yields required to effectively “pay for the release”.

## **THE SUBJECT SITE - CURRENT AND PROPOSED LAND USE ARRANGEMENT**

The attached plan prepared by Urbis provides an overlay of the proposed Structure Plan on the subject site. There are 2 significant issues that are dictating the potential quantum of developable land as follows:

- The most obvious constraint on the site is the effect of the proposed APZ, marked in red hatch. Aside from an apparent anomaly in the mapping of the APZ in the central portion of the site (resulting in a triangular area of apparent bushfire unconstrained land), the APZ as depicted:
  - represents a significant land take on what is otherwise identified as land suitable and shaded for residential land use.
  - Extends across land that is already developed for the existing school, including school buildings.
  - These issues warrant a need for further examination of the appropriateness or otherwise of the APZ in this location.
- The other significant issue is the site's affectation by the proposed sporting fields which also extend across adjoining lands. It is noted that the proposed sporting fields partly extend over existing school grounds and facilities, including basketball courts and a car parking area.
- The planned provision of these playing fields has been informed by the draft Demographic Study. Based on our review of this document it is apparent that the quantum of playing field space proposed is intended not only to service the needs of the release area but also to service a wider shortfall of such across the LGA.
- In our opinion there needs to be a much clearer definition of what the excess demand for sporting fields are across the LGA that is driving the quantum of provision of playing fields in Ingleside.
- If a primary driver is to also cater for LGA demands for sporting fields, then it is entirely reasonable that the cost of these facilities be:
  - apportioned equitably across the entire LGA, and not just to development in the release area.

- that opportunity for offsetting/works in kind be provided in any s.94CP that applies to the land.
- Clarity must be provided over the intended zoning of the sporting fields. It is assumed that any subsequent draft LEP would zone the proposed playing fields Public Recreation Open Space.
- If this is to occur, my client expects that the land will be the subject of a compulsory acquisition process in accordance with the Just Terms legislation. As mentioned above the proposed sporting fields extend across existing school facilities. The Just Terms legislation requires acquisition value for public purposes to be based on alternate highest and best use and this is reflected in the alternative layout proposed.

## ALTERNATIVE LAYOUT

Having regard to the factors above, an alternative urban design layout is attached with this submission. The key feature is the opportunity to provide added density around the site.

In our opinion the draft structure plan intention to limit housing on the school site to low density (i.e. single dwelling houses) is a lost opportunity that could take better advantage of easterly aspects across the proposed sporting fields.

Considering the current proposed road layout, and APZ, the site potentially has the capacity to yield approximately 12-15 detached houses @ circa 400sqm lots over land that is currently coloured for low density residential uses. This would take the form of single houses fronting the proposed single loaded road with rear yards serving as an APZ. Based on the proposed layout this is a very inefficient use of land. (Given that the proposed access road provides frontage and access to the proposed playing fields, we assume that cost of the road be included in any future s.94CP and accordingly is capable of being offset from contributions if it is constructed as part of gaining access to the subject site).

In this regard, it is apparent that the proposed built form largely been driven by the visual impact assessment contained in the exhibition material. It is arguable that this has taken a somewhat blunt approach to the application of the “townhouse/apartment” typology, considering that an 8.5m building height appears to be a key driver of visual impact.

This has the potential to set built form expectations unreasonably when land use planning is still at a structure planning stage. There is certainly no apparent land capability constraints that would preclude such as evident by our review of the Land Capability Assessment

An 8.5m building height can be equally applied to both single dwellings and town house / low rise apartment product. Given the stated concerns over yield more generally across the entire release area, it is critical that the structure plan does not serve to prescribe a less than optimal built form outcome when detailed design testing (and still to be determined DCP controls) has yet to be tested and exhibited.

This observation highlights some inconsistency in the Visual Impact Assessment in that the site falls within Area 2 where the assessment states:

*The relatively uniform physical landscape of Area 2 will also limit internal visibility of structures such as **low-rise apartment and town house built form which can be constructed without significant impact on views** from the external environment.*

*The limited external and internal visibility of Area 2 combined with its other physical and visual characteristics compared to other visual character areas, identify it as the area with the overall least visual constraints and **most potential for a range of residential development types**. (p.48 – our emphasis added)*

This quote from the Visual Impact Assessment does not align with the mapping on Page 45 of the report

Considering the Visual Impact Assessment suggesting opportunity for “low rise apartments” we have conducted a preliminary urban design analysis using a 9m building envelope spaced around a modified road network that provides opportunity for additional development over existing school land, but which has otherwise been identified for playing fields.

In this respect the preliminary urban design analysis has suggested a minor realignment of the proposed road to the south of the site such that it now abuts the southern boundary of the site. This minor realignment results in a more logical and efficient intersection design adjacent to proposed “Block G” and the adjacent open space. It also proposes an extension of a north south road to facilitate redevelopment of the school lands that is currently proposed as part of the playing fields.

The analysis has concluded that a SEPP 65 compliant arrangement of low rise medium density residential apartment blocks predominantly fronting the proposed open space, with an adjusted APZ buffer is achievable. This analysis has the potential to yield up to 256 apartments based on the assumptions as stated.

Increasing the density predominantly fronting the proposed sporting fields has many positive advantages, including:

- Maximising the utilisation of the adjoining open spaces’ amenity for a greater number of residents.
- Increases opportunity for passive surveillance.
- Increasing density around the playing fields provides an opportunity to better “frame” the space, which is expansive, providing a more distinct sense of identity and place.
- The increased density would also provide a better land use outcome by transferring the potential residential yield within the APZ into land which is unaffected by bush fire risk.

The recommended built form would reflect the current school’s set back from the vegetation in response to the APZ, whilst providing a built form which addresses the open space and defines its perimeter. Where proposed building envelopes extend into the APZ, it correlates with existing school built form, reinforcing the need for detailed review of the APZ at DA stage. It is understood that the school has previously obtained development consent for 2 dwellings in the western portion of the site in an area currently proposed for environmental conservation. If this is the case further reinforces the need to properly reinvestigate the APZ as it applies to the site. In the meantime, this history of approval potentially provides an opportunity for low intensity alternate uses in this part of the site.

## SUMMARY

As highlighted in this letter, we express our major concerns regarding the Structure Plan providing uncertainty around the future land use of the site and that the proposed land use for the site represents a sub-optimal outcome.

The timely delivery of the Ingleside Release will be driven by its affordability and this submission has highlighted a significant risk to the achievement of such. Our submission suggests a strong need to review potential yields across the entire release area and based on our review of the subject site, suggests opportunity for such in this instance. This needs to be supported by better quantification of demand for sporting fields and more detailed ground truthing of APZs as they are currently proposed / apply to the site.

Importantly additional density (in the form of townhouse / low rise apartments) can be potentially achieved on the site without compromising the key visual impact considerations that appear to be given significant weighting in the proposed determination of built form, and hence yield, across the release area.

We recommend that the best outcome for the subject site is medium density residential fronting the open space. As such, the Ingleside Precinct Structure Plan should be reconfigured to facilitate this outcome and this should be reflected in subsequent statutory and DCP controls

We understand that exhibition of draft statutory controls is the next stage in the consultation process. Prior to that stage, my client would be more than happy to discuss the contents of this submission in greater detail. I can be contacted on 82339900.

Yours sincerely,

A handwritten signature in black ink, appearing to read "David Hoy", with a stylized flourish at the end.

David Hoy  
Regional Director



## **APPENDIX**

### **CURRENT LAND USE ARRANGEMENT AND DRAFT STRUCTURE PLAN OVERLAY**

### **ALTERNATE LAND USE STRUCTURE PLAN**







ASSUMPTIONS

- 99,572 Site Area, including road area: 33,831 (sqm)
- 29,462 Total Residential Site Area
- 70% Residential Efficiency, Gross Building Envelope to GFA
- 80% Commercial Efficiency, Gross Building Envelope to GFA
- 86 GFA per Residential Unit - 2 Bdrm average
- 30 GFA per car park space
- 3.1 Floor to Floor Height, Residential
- 1.35 Car Spaces per Residential Unit (Includes 0.25 for visitor)

NOTES

- GBA Gross Building Area
- GFA Gross Floor Area
- FSR Floor Space Ratio

Legend

- Site Boundary
- Residential Site Area
- Precinct Plan
- Water Reservoir
- Water Management
- Community Centre
- Sporting Fields
- Parks
- Environmental Conservation
- Low Rise Apartments/ Townhouses
- Houses
- Rural



Apartment						
Area Schedule						
Building	Floorplate	Levels	Total GBA	Total GFA	Height	#Units
Residential, A	1,079	3	3,238	2,267	9.3	30
Residential, B	1,477	3	4,431	3,102	9.3	41
Residential, C	759	3	2,277	1,594	9.3	18
Residential, D	797	3	2,391	1,674	9.3	19
Residential, E	1,075	3	3,225	2,258	9.3	25
Residential, F	1,020	3	3,061	2,143	9.3	24
Residential, G	1,001	3	3,003	2,102	9.3	23
Apartment, H	831	3	2,494	1,746	9.3	19
Apartment, I	1,211	3	3,633	2,543	9.3	28
Apartment, J	1,214	3	3,641	2,548	9.3	28
Total	10,465		31,394	21,976		256
Summary						
Total GFA	21,976					
Total Resi Units	256					
Total FSR	0.75					
Basement Parking	Floorplate	Car Park Spaces per level	Levels	Car Park		
Site - Basement	29,462	982.06	1	982		
Total spaces provided				982		



5 CHILTERN RD, INGLESIDE  
CONCEPT PLAN

DATE: 27.02.2017  
JOB NO: SA6591  
DWG NO: X-XX0-XX000  
REV: 0







AERIAL PERSPECTIVE TOWARDS THE DEVELOPMENT FROM SOUTH-EAST OF THE SITE



AERIAL PERSPECTIVE TOWARDS THE SITE FROM THE INTERSECTION OF CHILTERN RD AND MONA VALE RD