NSW Department of Planning and Environment

Submission on Arncliffe and Banksia Priority Precinct Rezoning Proposal and Development Control Plan

I strongly urge the NSW Department of Planning and Environment (referred to as DPE in this document) to reconsider a number of factors in the draft Arncliffe and Banksia Priority Precinct Rezoning Proposal and Development Control Plan.

This is a summary of my concerns:

Number of new dwellings proposed

Given current conditions and the current number of new dwellings in our area, the height and bulk of the new developments would see Bayside West far exceeding its target for new dwellings, which would have a negative effect on the area. The current rezoning proposal allows for approximately five thousand new dwellings in Arncliffe and Banksia. The DPE's own Bayside West Precincts Draft Land Use & Infrastructure Strategy document outlines in Section 6.4 the forecasts of new dwellings for both Arncliffe and Banksia. Table 1 (page 27) shows that the number of additional dwellings in Arncliffe and Banksia by 2026 is projected to be 2,265, yet this number had already been exceeded in 2016. According to an analysis prepared for Balmain MP Jamie Parker in December 2016 and reported on by James Robertson in the SMH on 06/02/17 (http://www.smh.com.au/nsw/sydneys-tale-of-two-suburbs-new-analysis-shows-the-wide-spread-of-development-20170204-gu5hwq.html) Rockdale Council is over its projected target of new dwellings by 2,414 new dwellings. This means that there is a danger of reaching a glut of new dwellings in Bayside West, and thus not achieving the "revitalisation" which the DPE envisages for our area.

Responding to the local character and heritage values

As per the Draft Land Use and Infrastructure Strategy Document, any new developments must take into consideration the character and heritage values of our local area (Section 5). Section 5 also states that one of the key considerations is the importance of maintaining and enhancing views to significant landmarks. The 2011 Rockdale DCP "specifically identifies the views of the St Francis Xaviers Church and St David's Church spires on Forest Road as key landmarks which should be considered in site planning." (Draft Land Use and Infrastructure Strategy Document, page 22). Yet the proposed changes show that both churches would be surrounded by high- rise development. This proposal is thus not in keeping with the strategy guidelines or the current DCP. Greater consideration needs to be made to maintain and value the heritage of our area, such as these churches and their associated church buildings.

Appropriate Transitions in height and built form

The Strategy states that medium density, low rise residential development should adjoin existing areas of low density to ensure an appropriate transition in height and built form. This consideration has not always been adhered to in the draft rezoning plans.

For example, the block bordered by Forest Road, Somerville Street, and Pit-Owen Street is proposed to be high density of eight storeys. Given that in the current proposal the majority of dwellings surrounding this block are low density, the rezoning of this block to high density does not provide a suitable transition in heights to ensure that development is in keeping with the local character. In addition, the proposed Development Control Plan (DCP) states that properties on Forest Road opposite the block bordered by Forest Road, Somerville Street, and Pit-Owen Street and closer to Arncliffe town centre should have a street wall facing of two storeys, while any new build on the block bordered by Forest Road, Somerville Street, and Pit-Owen Street should have a street wall facing of 5 storeys.

In addition, the proposed DCP states that any new build should maintain the current set backs on Somerville Street and Pitt- Owen Streets. At present on Somerville Street the main dwellings are set back approximately 10 metres, however there are a few garages with only a 2 or 3 metre set back. The DCP needs to specify whether the current set backs apply to the main properties or to any built form, such as garages. Moving on to Pitt- Owen Street, there is currently a one storey property which has no setback from the footpath, and two additional two storey properties which have two metre setbacks to the footpath.

While on paper maintaining current setbacks may sound like a good idea, in reality by following these guidelines Pitt-Owen Street could have a development with a five storey street wall height with a set-back of as little as one metre, and Somerville could have a five storey street wall height at a set-back of as little as two metres. The properties on the opposite side of Pitt- Owen Street have set backs of four to five metres. The proposed DCP guidelines for this block are not specific enough, and as they stand do not provide an appropriate transition in height and built form. In addition, they do not follow the State Environmental Planning Policy No. 65, which states the principle of "ensuring good building separation between buildings on site and those around the site, for visual privacy, amenity and outlook." The DCP needs to be amended to reflect the above.

Height of development around schools

As well as the churches and their associated buildings, this proposal means that St Francis Xaviers Catholic primary school and Arncliffe Public School would be surrounded by high rise buildings. St Francis Xaviers school would have buildings of up to 31 metres surrounding it, and Arncliffe Public School would have buildings from 12 to 22 metres surrounding it. Allowing such developments puts our children at risk. The State Government requires that any person coming in to school premises must have a Working with Children Check, yet anybody at all could sit at the window of any of these high-rise buildings and watch our children while they are at school. In addition, school is a place where children should be able to play in open green space, not space which is hemmed in on all sides by high rise. Lastly, with all these additional dwellings our schools will need room to grow to accommodate a larger population. This must be considered before making any decisions about rezoning, not after the fact.

Publicly accessible open space

The amount of available green, open space is very small compared to the approximately ten thousand unit dwellings proposed. Recent research in the medical, public health and urban design literature shows the importance of publicly accessible green open space for both physical and mental public health. When referring to open space the Bayside West Precincts Draft Land Use & Infrastructure Strategy must designate green open space to be publicly accessible. There needs to be a greater number of pocket parks spread across the whole of Arncliffe and Banksia, and the Cooks Cove South must also remain in public hands, particularly the beautiful river fore shore, landing lights wetlands and the playing fields.

Effect of current rezoning proposal on traffic and parking

The streets in the Bayside West precinct are already busy, and street parking is already insufficient for the number of people in our area. I do not believe that the traffic flows have been appropriately thought through when deciding on the areas for rezoning. To take as an example once again the block bordered by Forest Road, Somerville Street, and Pit-Owen Street, where would driveways be located? Somerville street is a busy and narrow thoroughfare, with many drivers not keeping to the 50kmh speed limit, and using the street as an alternative to the Princes Highway, so would be far too busy for any main driveways. Forest Road is also far too busy to have driveways into any new development on the block. Pitt- Owen Street is a small dead end street off Forest road, and turning right from Pitt- Owen Street onto Forest Road would be quite difficult, thus reducing access for people living in any development there, should one be approved.

The above is just one example. Greater thought needs to be put into traffic flows for the whole area before any rezoning is approved; it cannot be treated as an after- thought.

The above summarises my main concerns with the Arncliffe and Banksia Priority Precinct Rezoning Proposal and Development Control Plan. Please amend the Proposal and Development Control Plan accordingly.