

27 February 2017
Department of Planning NSW
ATTN: Ann-Maree Carruthers - Director of Urban Renewal
GPO Box 39
Sydney NSW 2001

RE: Objection to the extensive rezoning of the Arncliffe-Banksia area as a Priority Precinct containing mainly high density zoning.

Dear Ann-Maree

I'm writing to convey my objection to the planned rezoning of the Arncliffe-Banksia area. The transport and infrastructure report highlights the fact that the Arncliffe-Banksia area is not suitable to proceed as a Priority Precinct as the infrastructure in the area is not capable of supporting additional growth from a transport perspective. Furthermore, I strenuously object to the areas on the western side of Barden St/Broe Ave being rezoned R4 high density with a height restriction of 22m. Rezoning of this area does not consider the nature of the local topography or the character of the local area.

Our roads and our rail cannot support the current community let alone the increase planned.

The road network within Arncliffe was not planned for high density population and would struggle under the weight of additional vehicular traffic, increase noise and air pollution and reduced safety for pedestrians with a lack of adequate footways, crossings and access options for such an increase in density.

Our roads are narrow and key access points are already congested throughout the day. The population and density targets envisaged in the Draft plan will compound existing problems and in fact recognises that the roads are currently at capacity. While the draft precinct plan identifies some of the main road pinch points it highlights the next action as 'possible review' in most instances. In all instances, improvements to road infrastructure as subject to feasibility and ultimate business case.

The roads in our suburb do not cope with the current levels of traffic and certainly don't have capacity for increased traffic. Local roads are not factored into any assessment and would bear the brunt of additional traffic chaos. For example the northern end of Station St is one way traffic and the adjacent length is narrow and unpassable for two way traffic. Rezoning and redevelopment as drafted is inappropriate and would cause exacerbate such flow issues. Further, the nature of any developing works occurring after rezoning would render the street virtually unusable as demonstrated by example that is found locally on Arncliffe St, Wolli Creek during that precinct's growth.

JTW data indicates that 64% of residents in the Arncliffe-Banksia precinct travel to work by a car and Appendix G: Arncliffe and Banksia Precinct Transport Plan states that the "current road network is already at capacity in several key locations, and has little to no spare capacity to accommodate additional growth in traffic volumes"

- The transport plan for the Arncliffe-Banksia precinct projects that driver numbers will elevate in peak hour in 2036 by 2310 peak hour person trips from the precinct
- Traffic and congestion on Princes Highway can only be remedied through the reduction in through traffic facilitated by the construction of the F6 Motorway. This road is only within an investigation phase and no funding has been allocated.

The Precinct Plan also acknowledges that the existing public transport infrastructure is also already at capacity. Adding 5000 dwellings to the area will logically exacerbate the problem with no funding prescribed to meaningfully fix capacity on the T4 line. While the Priority Precincts program is designed to provide new housing and jobs in centres with good existing or planned transport services the detailed report at Appendix G: Arncliffe and Banksia Precinct Transport Plan shows that the existing services on the T4 Illawarra line cannot “support long term growth along the line without sacrificing quality of service during peak periods.” and as such the basis of the Arncliffe-Banksia area as a Priority Precinct is severely flawed! In fact the report states that with **existing projected population growth** “it is anticipated that the existing services will reach load limits by approximately 2024.” and “As demand approaches the line load limit, passengers will experience significant increases in delay and travel time variability, as trains become too full to accept new passengers” (section 7.2 Rail Services).

The following items must be highlighted within the report:

- “The 6 all-stops services, which stop at Arncliffe and Banksia, have an average load of 98% nominal train capacity at Sydenham in the 2014 AM peak hour” (section 3.3.1 Passenger Rail)
- “The average train load across all 15 suburban service on the line was 99% nominal train capacity at Sydenham in 2014 AM peak hour” (section 3.3.1 Passenger Rail)
- “There is currently no funding for rail network upgrades that would benefit the Arncliffe and Banksia precincts. Any upgrades would likely be delivered post 2031.” (section 4.1.1 Rail Network Planning)
- “As this is a proposal founded on train station precincts, the forecast lack of available capacity on the T4 Illawarra and South coast Lines in the long term presents a **significant barrier** to being able to support additional growth within the Arncliffe and Banksia Precincts from a transport perspective, without bringing forward the need for significant rail investment”

The character of Arncliffe must be protected

The suburb of Arncliffe is a mature suburb consisting of leafy streets housing a varied and well established community. The precinct proposal does not consider the local qualities of our family orientated neighbourhood, taking a broad brush approach to the rezoning of buildings that create the character of the streetscapes and identity of the suburbs of Arncliffe and Banksia. The proposal does not meet the criteria set out within the Rockdale Development Control Plan (DCP) 2011 to protect and preserve the architectural styles, village character and housing diversity within Arncliffe. I invite you to **actually** visit the area and look at the many well kept Federation and Victorian houses that are threatened by the Priority Precinct Plan and I suggest you read the valuable reference “A Village Called Arncliffe” by Alderman R.W. Rathbone to gain an understanding of the history you are prescribing to be deleted with the flourish of your coloured markers! Your lack of understanding of Arncliffe and it’s history is a shameful indictment upon your department.

The historic views from the Forest Rd ridgeline area to the CBD and Botany Bay, as noted within the Rockdale DCP 2011, must be maintained for the amenity of residents on the ridgeline and from public lookouts along the ridgeline such as Towers Place Lookout, this is best addressed through maintaining the current height restrictions.

No transitional medium density zoning has been considered between the R4 high density and retained existing R2 low density with the potential for unsightly, overshadowing high density development hard up against established low density dwellings. Further these plans offer very little by way of varied housing options as the plan is very heavy on high density across Arncliffe with only a small medium density area slatted on the Southern side of Wickham St (and this is only prescribed due to airport building height restriction requirements)

The designated R4 height restrictions do not consider the local topography of the terrain along the Forest Rd Ridgeline, for example The Pitt-Owen/Forest Rd/Sommerville St area is located on a steep ridgeline that is not remotely compatible with 8 Storey buildings. High density development in this area will have a detrimental impact upon important historic views to and from the local landmarks in the area as prescribed in the Rockdale Development Control Plan (DCP) 2011 including St. Frances Xaviers and St Andrews Churches

I'm concerned that the feasibility analysis of the proposal considered in Appendix H: The Economic & Feasibility Analysis shows the current FSR of 2:1 is not viable and that FSRs will be exceeded to make developments viable in the Precinct (Section 5.3 Land use and Density Threshold) such increases in FSR will lead to poor outcomes for the greater community through developments that provide for restricted open space and taller buildings with an even greater impact upon neighbouring properties.

The proposed high-density plans for the whole Arncliffe-Banksia precinct are not appropriately positioned in an area of stable, established communities. Our neighbourhood has many long term residents with families, cultural, social and community networks, these face being upended by this extremely poorly considered plan and would lead to our existing balanced blend of cultures and neighbourhood values being lost.

The priority precinct plans have been released after the 2016 amalgamation, a time when the local community has no elected representatives to voice their concerns. For this reason I request that if the NSW Department of Planning and the Environment is interested in true community consultation that the Priority Precinct process for the Bayside West Precincts of Arncliffe & Banksia and Cooks Cove be halted until the elected councillors of the newly formed Bayside Council are elected in the upcoming council elections in September 2017.

The timing of the release of the Precinct Proposal over the Christmas period has meant that many residents have been away and not focussed on local issues. Given that many residents most greatly affected by the rezoning plan have not been directly informed of the changes, the consultation period must be extended until at least 28 March 2017 to allow time for residents to make submissions on the proposal.

The information available for consultation is extensive; complex and ultimately confuses people and obfuscates the planning process. The range of illustrations provided change scale and must all be

read together to gain a true understanding of the changes and their application. This is not effective consultation or transparent communication with the community.

Also noted within the Report, Arncliffe and Banksia are culturally diverse communities with many experiencing housing stress and low average household incomes. These factors represent key vulnerabilities when it comes to exploitation in residential development plans and practice. It is incumbent the Department of Planning to make all efforts at genuine and meaningful consultation if they are to effectively consider or even respect these communities as important stakeholders in the changes that directly affect them. Information surrounding the 'repurposing' of the existing government housing in the area reinforces just how much of a 'done deal' local residents feel this plan is.

Additionally I have considerable concerns about the quality of development forecast. The existing development of Wolli Creek has shown little proactive or well-considered government management. One has only to consider the eyesore of "Top Garden" or the balcony to balcony views on Brodie Spark Drive to question just what is meant by 'quality development'. Simply put, government at all levels has demonstrated a significant lack of will or interest in regulating the activities of developers for the existing or even future communities. In this light, the rezoning to high density occurs to not only meet state targets but also to provide enough economic incentive for such development to occur

I sincerely request that you consider these items and rescind the plans for high density zoning in the Arncliffe-Banksia precinct to the west of Barden St/Broe Ave, maintaining the current R2 density, and ensure that the character of the suburb of Arncliffe is maintained.