

Matthew Lennartz  
Executive Manager – Planning and Government  
Level 11, Meriton Tower  
528 Kent Street  
Sydney NSW 2000

17 January 2020

**Ref No: D03768163**

Dear Mr Lennartz

**Little Bay Cove Planning Proposal – Amended Scheme**

I write in relation to the amended scheme that was presented by you on 13 December 2019 here at Council, for land at 1406-1408 Anzac Parade, Little Bay also known as 'Little Bay Cove'.

The amended scheme would result in the following

- FSR 1.75:1
- 3-15 storeys
- 10% open space
- Approximately 1650 dwellings

The proposal includes a vision of a fully master planned site to the north of the proposal site, including the LAHC estate and the long bay Correctional Facility as part of the strategic context, and justification, for the proposal. It includes the relocation of the Long Bay Correctional Centre and the redevelopment of the Correctional Centre and the LAHC estate. Both of which has not been committed to by the State Government and no time frame has been established.

The proposal also relies on possible future public transport initiatives (i.e mass transit to south east, rapid bus links), as outlined in the State Government's Future Transport Strategy. However, these projects are identified for 'investigation only' and at this point in time, there is no certainty of these transport initiatives servicing the site in the short to long term. In the absence of the South East Sydney Transport Strategy and committed improvement to transport infrastructure to the site and area, the strategic potential of the area cannot be fully understood and with it any proposed increases in density.

In this regard, the primary determinants in allowing for a new strategic approach to the area is the provision of improved public transport infrastructure to the site and the relocation of key state infrastructure being the long bay gaol are uncertain and unknown. Put simply, there is not sufficient justification for an up zoning of this scale at this time.

Council officers have undertaken a preliminary review of the amended concept scheme and have identified the following key issues:

1. Scale and built form:

The tower configuration and heights proposed is incompatible with the sensitive coastal environment and surrounding development; and results in excessive building height and bulk as illustrated in the (revised) Visual Analysis including unacceptable impacts in terms of overshadowing.

A revised concept scheme should consider more low to mid-rise building typologies with lower rise buildings to the south and particularly to the east.

2. Density:

The revised scheme presents only a minor reduction to density from 2:1 to 1.75:1 and number of dwellings, i.e 15%. It is still more than three times the density that was originally approved (by the LEC) and without any certainty of improved transport infrastructure to the site. This substantial increase in density still results in excessive building height and bulk as illustrated in the (revised) Visual Analysis, and to the surrounding coastal setting.

3. View impact:

The revised scheme still presents an impact (although reduced) on views particularly from Little Bay Beach and the coastal scenic character of the area. No buildings should exceed the already approved height particularly on the sensitive eastern edge.

4. Housing diversity:

There is a lack of housing diversity, as high rise is still the predominant form in the revised proposal. There is a need to consider more low- rise housing types i.e terrace housing, single dwellings as demonstrated in the Prince Henry development to the south, to match housing need in the City. Council's draft housing strategy has identified the need for more housing diversity particularly semi-detached housing and low rise medium density housing types to suit family and down sizer households, particularly within the City's more suburban areas and outside of the town centres. Council's draft housing strategy identifies that higher density housing (as proposed by the proposal), is to be located within town centres, close to services and transport. The proposal is therefore inconsistent with the strategy's guiding principles for growth.

5. Open space and access:

The revised scheme has reduced the provision open space from the original planning proposal (lodged on 4 Sept 2019) of 35,670m<sup>2</sup> (36% of the site) down to 10%; and the configuration, function and usability of the open space proposed is poor.

6. Environmental considerations:

Issues with tower locations, basement excavation and proximity to the sensitive geological miocene site, ESBS and ochre deposits. Insufficient consideration on the potential impacts of the revised scheme on these environmental conditions.

7. Transport:

The revised scheme did not provide any additional information regarding transport and parking provision. Given that the density and overall number of dwellings have only reduced by 15%, the key issues remain regarding the lack of sufficient transport and parking infrastructure to support the intensification of use and the large number of dwellings and unrealistic mode share shift. The original proposal asserts that by using the reduced car parking, improved public transport and the mixed-use precinct, the mode shift between public transport and private vehicles will be essentially swapped from 18% public transport to 68%, and from 64% private vehicle to 30%. This mode shift is unlikely to occur in this location. Moreover, there are already capacity constraints at the Anzac Parade / Beauchamp Road and broader area without any development.

Without any certainty in the level of public transport infrastructure investment to the site and area in the short to long term, it is highly unlikely that a mode shift towards the rates proposed in the original proposal can be achieved.

In relation to the Voluntary Planning Agreement (VPA), it is Council's position that the strategic and site specific merits of the proposal needs to be established for there to be any meaningful discussion about public benefits through a VPA.

Please contact me on 9093 6894 should you require any further information and/or clarification on any of the points raised.

Sincerely

A handwritten signature in black ink, appearing to be 'Kerry Kyriacou', with a stylized, flowing script.

**Kerry Kyriacou**  
Director City Planning