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1 - INTRODUCTION

This document sets out the justification and implications for the proposed amendment to the Ku-ring-gai Local Environmental Plan 2015 to reclassify 4 Pennant Avenue, Gordon from 'community land' to 'operational land' and rezone from the current zoning of RE1 Public Recreation to R3 Medium Density Residential.

The information in this report will form the basis for preparing a formal planning proposal in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979* and *A Guide to Preparing Planning Proposals* (Department of Planning and Environment, 2016).

2- DESCRIPTION OF THE SITE AND USE

<u>Description</u> - The site is located at the eastern end of Pennant Avenue, Gordon. The site is situated approximately 250m west of the Pacific Highway, Gordon. The site is irregular in shape, with a main frontage to Pennant Avenue, and an access handle to the north of the site providing pedestrian access to Bushlands Avenue, Gordon (between numbers 18 and 22 Bushlands Avenue).

The site has a combined area of 12,838sqm. The site comprises:

- Lot X DP387680 1638sqm
- Lot Y DP387680 1.12ha

The site has historically been used by Gordon Bowling Club.

Lot X DP387680 is located at the western part of the site, and contains:

- Trees and vegetation identified as Sydney Turpentine-Ironbark Forest.
- Asphalt entrance and exit driveways to the carpark.

Lot Y DP387680, which is the larger of the two parcels, is located on the eastern part of the site and contains:

- A single storey former clubhouse building in the central northern portion of the site
- An asphalt paved carpark area located towards the south west of the former clubhouse building
- Three (3) lawn bowls greens
- A greenkeepers shed and storage area adjacent to the eastern boundary of the site
- A toilet block and additional greenkeepers storage towards the south eastern corner of the asphalt car parking area
- An asphalt pathway along the access handle in the northern portion of the site, providing pedestrian access to Bushlands Avenue.

Ownership and Use: Records indicate the site was progressively acquired by Council between 1950-1953.

Interests that affect the site include:

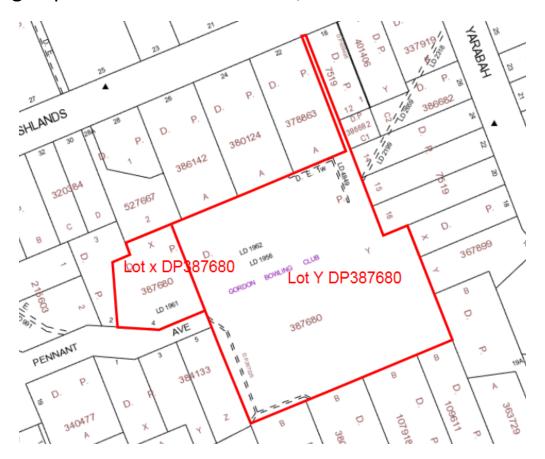
a number of drainage easements

- The Certificate of Title notes the lease to the Gordon Bowling Club, which expired in 2009 with two 5 year options for renewal. This lease has since been terminated see below.
- Trust Deed No.18029 dated 9 December 1953 notes that the subject lands are held by Council as Public Reserve.

The site was occupied by the former Gordon Bowling Club, which leased the site from Council. In 1953 the club was granted a 50 year licence to use the land to build the clubhouse and undertake bowling activities. Council constructed the first green, and the club were responsible for building the clubhouse and two further greens. Bowls has occurred on the site since 1954, and the clubhouse officially opened in 1956. On 15 August 2017, Gordon Bowling Club Limited advised Council that they wished to terminate the lease with Council and vacate the property in early 2018. The key reason for the club vacating the site was declining membership.



Aerial Photo of 4 Pennant Avenue, Gordon



Lot X DP387680 and Lot Y DP387680 – 4 Pennant Avenue, Gordon



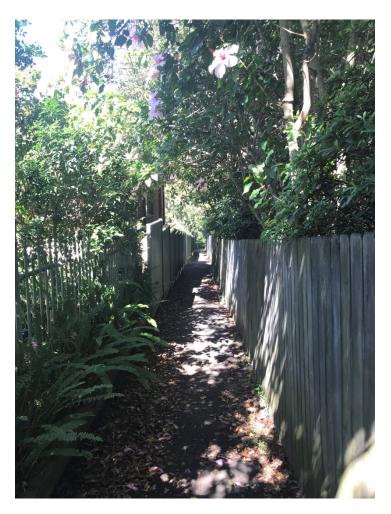
Bowling Greens (Lot Y DP387680) – 4 Pennant Avenue, Gordon



Carpark and clubhouse (Lot Y DP387680) - 4 Pennant Avenue, Gordon



Trees western part of site (Lot X DP387680) – 4 Pennant Avenue, Gordon



Pedestrian access way to Bushlands Avenue (Lot Y DP387680) – 4 Pennant Avenue, Gordon

3 - RELATIONSHIP WITH ADJOINING LAND

The sites are adjoined by single dwelling houses to the north, south, east and west. The surrounding area is zoned R2 Low Density Residential.

Further to the east of the site, closer to the Pacific Highway (between 90-150m from the site) is land zoned R3 Medium Density Residential and R4 High Density Residential.

The site is located approximately 400m (as the crow flies) from the Gordon town centre and Gordon Station. The site is approximately a 600m (9min) walk to Gordon Station via the pedestrian access handle to Bushlands Avenue.

4- PLANNING CONSIDERATIONS

Ku-ring-gai Local Environmental Plan 2015 sets out the key planning considerations for the sites.

Zoning: RE1 Public Recreation



Excerpt Zoning Map KLEP 2015

Floor Space Ratio: No Floor Space Ratio control for land Zoned RE1 Public Recreation



Excerpt Floor Space Ratio Map KLEP 2015

<u>Height of Buildings:</u> No height controls for land zoned RE1 Public Recreation.



Excerpt Height of Buildings Map KLEP 2015

<u>Lot Size:</u> No minimum lot size controls apply to land zoned RE1 Public Recreation



Excerpt Minimum Lot Size Map KLEP 2015

<u>Heritage:</u> The site is not identified as a Heritage item under Ku-ring-gai Local Environmental Plan 2015. The southern boundary of the site adjoins the Smith Grant Heritage Conservation Area (C19) and the eastern boundary of the site adjoins the Yarabah Avenue Conservation Area (C18).



Excerpt Heritage Map KLEP 2015

<u>Bushfire Prone Land:</u> The site is not recorded as Bush Fire Prone Land on the Bush Fire Prone Land Map.

<u>Riparian:</u> The property is mapped as containing Category 3a Water Course Restoration Riparian Land on the Riparian Lands Map in KLEP 2015. Category 3a is a discontinuous or piped watercourse.



Excerpt Riparian Lands Map KLEP 2015

<u>Biodiversity and Greenweb:</u> The property is mapped as containing areas of Biodiversity Significance under the KLEP 2015 Biodiversity Map. The Biodiversity Significant land is then broken down into different categories on the Greenweb Map. The site contains land mapped as Canopy Remnant, Biodiversity Corridors and Buffer Areas, and Support for Core Biodiversity Lands on the Greenweb Map.



Excerpt Biodiversity Significant Lands Map KLEP 2015



Excerpt Greenweb Map Ku-ring-gai DCP

<u>Ecological Significant and Condition of Lot X DP387680:</u> The lot contains roads running along the northern, western and southern boundaries and the east adjoins the carpark for the bowling club. The area of the lot which is not taken up by road is made up of an approximately 1000sqm vegetated area.

The site includes highly significant canopy remnants, including: 2xEucalyptus pilularis, 1xEucalyptus saligna and 2x Angophora costata each with a diameter at breast height (DBH) of greater than 120cm and

containing numerous hollows for local fauna. Additional trees including *Syncarpia glomulifera* and *Angophora costata* of much younger cohort are also present along with a mix of other tall shrubs and assorted canopy. The mid-storey and ground covers are largely absent and sections of the lot are mowed, whilst areas around the base of the larger trees are excluded from mowing and are mulched.

The vegetation community represented on the lot, based on the remnant vegetation and position in the landscape, conforms to the Sydney Turpentine-Ironbark Forest vegetation community (STIF).

Sydney Turpentine-Ironbark Forest is listed as an Endangered Ecological Community (EEC) under the NSW Biodiversity Conservation Act 2016 (BC Act) and as a Critically Endangered Ecological Community (CEEC) under the Commonwealth EPBC Act. The vegetation on Lot X DP 387680 is consistent with the determination for STIF under the BC Act and maybe consistent with the determination under the EPBC Act.

Due to the large remnant canopy species which contain numerous hollows, the vegetation community being an EEC and a soil seed bank which is likely highly resilient and would respond well to appropriate restoration management, the site is highly significant from an ecological perspective.

<u>Contamination:</u> A Stage 1 Preliminary Site Investigation has been undertaken on the sites by Alliance Geotechnical 22 March 2018. The Phase 1 concludes that there are a number of areas of environmental concern that have been identified on the site from past activities, including uncontrolled demolition, uncontrolled filling, application of herbicides/pesticides and chemical storage.

The Phase 1 concludes that the site could be made suitable (from a land contamination perspective) for future land use settings subject to further assessment, management and remediation. The report recommends that a Stage 2 Detailed Site Investigation be undertaken for the site.

<u>Classification and Reclassification:</u> Public Land is defined by the *Local Government Act 1993* as any land vested in, or under Council control. Public land is managed under the *Local Government Act 1993* based on its classification. All public land must be classified as either 'community land' or 'operational land'. Both parcels of land (Lot X and Lot Y DP387680) are currently classified as 'community land'

- Community Land is land Council makes available for use by the general public, for example, parks, reserves or sports grounds. Community land must not be sold, exchanged or otherwise disposed by Council. It can be leased, but there are restrictions on the grant of leases and licences and also the way community land can be used.
- Operational Land is land which facilitates the functions of Council, and may not be open to the
 general public, for example, a works depot or Council garage. An operational classification permits
 Council to sell, exchange or grant an interest including longer term lease to another party other
 than in accordance with the provisions of the Local Government Act 1993.

Reclassification of public land can be undertaken through a planning proposal to make an amendment to the KLEP 2015, Schedule 4 Classification and Reclassification of Land.

Reclassification would be subject to the local plan making processes in the *Environmental Planning and Assessment Act 1979* and the public land management requirements in the *Local Government Act 1993*.

As part of the reclassification process any interests (such as leases, easements, covenants or restrictions) or public reserve status affecting the land can be extinguished.

5- OBJECTIVES AND INTENDED OUTCOMES

To rezone and reclassify the site to facilitate future development for multi dwelling housing. This could involve the following options:

Option 1:

- Reclassify part of the site being Lot Y DP387680 from 'community land' to 'operational land'
- Rezone part of the site being Lot Y DP387680 from RE1 Public Recreation to R3 Medium Density Residential
- Apply a Floor Space Ratio of 0.8:1 to part of the site being Lot Y DP387680
- Apply a Maximum Height of Building of 11.5m to part of the site being Lot Y DP387680
- The current RE1 Public Recreation zoning and 'community land' status of part of the site being Lot X DP387680 will be retained. This part of the site would be categorised as a Natural Area Bushland under the *Local Government Act 1993* and managed through bushland plan of management. This would allow for the retention of the significant trees and vegetation on the site, while providing open space for passive recreation.

Option 2:

- Reclassify the whole site being both Lot X DP387680 and Lot Y DP387680 from 'community land' to 'operational land'
- Rezone the whole site from RE1 Public Recreation to R3 Medium Density Residential
- Apply a Floor Space Ratio of 0.8:1
- Apply a Maximum Height of Building of 11.5m

6 - JUSTIFICATION

<u>Need for Planning Proposal</u> – The site is the former Gordon Bowling Club, which due to declining membership terminated their lease with Council and vacated the property in early 2018. The sites future use under the current RE1 Public Recreation zoning is not considered the highest or best use of the site.

The co-ordinated and orderly use of the land would be best facilitated by reclassifying the site to 'operational land' and rezoning to medium density residential to provide greater housing choice while still being compatible with the surrounding context and built form.

<u>Consistency with strategic planning framework</u> – The planning proposal to reclassify and rezone the site is consistent with the following strategic planning policies and plans:

- Ku-ring-gai Council Community Strategic Plan The reclassification and rezoning of the site is consistent with the following issue and long term objectives:
 - C6.1 Housing Choice and Affordability
 - Long Term Objectives 'Councils planning approach to the provision of housing across Kuring-gai addresses the supply, choice and affordability of the community 'and 'Diversity and

supply of new housing has been investigated to provide safe and responsive housing that addresses the changing population'

The site is located in an established residential area. The Planning Proposal would allow the site to be redeveloped for housing, increasing housing supply in the local area. Rezoning the site from RE1 Public Recreation to R3 Medium Density Residential would achieve the objectives relating to housing choice and affordability by better meeting the needs of the changing population by providing a broader and diverse range of housing – instead of free standing houses or apartments – to suit different lifestyles and address housing affordability.

A review of the Community Strategic Plan in 2017 included community planning workshops. The sentiments from the consultation was the need to provide a greater mix of housing, particularly housing in the form of townhouses in order to provide for downsizers and a more affordable housing option for younger families.

- Greater Sydney Region Plan A Metropolis of Three Cities (March 2018) This is the key strategic plan prepared by the Greater Sydney Commission and sets out the 40 year vision for the Sydney Metropolitan Area. It provides direction for Sydney's Infrastructure, Productivity, Liveability and Sustainability. The reclassification and rezoning of the site is consistent with the following objectives:
 - Objective 10 Greater Housing Supply
 - Objective 11 Housing is more diverse and affordable
 - Objective 14 Integrated land use and transport creates walkable and 30minute cities

Currently, most new home built in NSW fall into two categories – either traditional free standing houses or apartments. Almost 75% of all dwellings in Ku-ring-gai are separate houses (low density), which is much higher than the Greater Sydney average of 55%. Ku-ring-gai also has a significantly lower proportion of medium density dwellings than the Greater Sydney average. The changes resulting from the planning proposal will permit an increase in supply of medium density housing in Gordon, contributing to the objectives of providing ongoing housing supply and a range of housing types in the right location, in order to support Sydney's growing population.

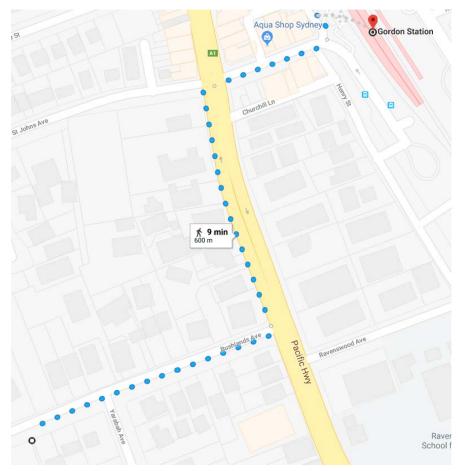
Rezoning part or all of the site to R3 Medium Density Residential will support the objective relating to diverse and affordable housing. A range of housing types within a centre provides for the needs of the community at different stages of life, and caters to diverse household types. It means that as people age they can move into smaller homes and stay in their existing neighbourhood. Medium density housing provides an alternative, and a more affordable housing choice compared to a free standing house.

The objective of a 30min city is so people are able to access jobs and services in their nearest metropolitan and strategic centre within 30min by public transport. The site is well located in terms of accessibility to transport, to both the Pacific Highway and Gordon Station, providing access to the metropolitan centre of Sydney CBD, and the strategic centres of Chatswood, Hornsby, Macquarie Park and St Leonards.

- North District Plan (March 2018) This plan implements the Greater Sydney Region Plan at a district level. The 20 year plan is a bridge between regional and local planning. The reclassification and rezoning of the site is consistent with the following planning priorities:
 - Planning Priority N5 Providing housing supply, choice and affordability, with access to jobs, services and public transport
 - Planning Priority N12 Delivering integrated land use and transport planning and a 30min city

The reclassification and rezoning would allow for the reasonable residential redevelopment of an existing well located site. The reclassification and rezoning meets the objectives relating to the delivery of housing supply and contributes to the additional 92,000 new homes required in the North District from 2016-2036. Rezoning to medium density residential provides housing choice which better meets the needs of Sydneys changing population by providing a broader range of housing options to suit different lifestyle and affordability needs.

The site is well located in terms of access to jobs, services and public transport, consistent with the objective of a 30min city. The site is in close proximity to Gordon town centre – providing access to shops and services, and in close proximity to Gordon Station providing access to public transport (trains and buses). An excerpt from Google Maps shows that the site is approximately 600m to the Gordon town centre and Gordon station, which is a 9min walk.



Excerpt Google Maps – Proximity to Gordon town Centre and Station

- o <u>S117 Ministerial Directions</u>—These are directions issued by the Minister for Planning to relevant planning authorities under s117 of the *Environmental Planning and Assessment Act 1979*. The reclassification and rezoning is consistent with the following directions:
 - <u>3.1 Residential Zones</u>
 - 3.4 Integrating Land Use and Transport
 - 7.1 Implementation of Metropolitan Plan

The reclassification and rezoning would be consistent with the objectives of 3.1 Residential Zones as it will provide a variety and choice of housing types to provide for existing and future housing needs of the local community, and Sydney as a whole. The site is well located, ensuring that new housing has appropriate access to infrastructure and services.

The objective of direction 3.4 integrating land use and transport is to ensure that urban structures, building forms, land use locations, development designs, subdivisions and street layouts achieve improved access to housing, jobs, and services by walking, cycling and public transport – reducing the demand and dependence of cars. The site is well located on the southern periphery of the Gordon town centre, providing access to shops and services, and is well located in terms of accessibility to public transport – including buses and trains – at Gordon Station. The site is a walkable distance (1km or 12min) to the local services and infrastructure.

- SEPPS State Environmental Planning Policies (SEPPs) are made where the Minister for Planning is
 of the opinion that the matters concerned are of significance for the State. The rezoning and
 reclassification is consistent with the following SEPP:
 - SEPP 55 Remediation a Phase 1 Preliminary Site Investigation was carried out on the subject site which concluded that a number of areas of environmental concern that have been identified on the site from past activities including uncontrolled demolition, uncontrolled filling, application of herbicides/pesticides and chemical storage. The Phase 1 concludes that the site could be made suitable (from a land contamination perspective) for future land use settings subject to further assessment, management and remediation. It is recommended that a Stage 2 Detailed Site Investigation be undertaken on the site.

<u>Context</u> – The site is adjoined by traditional freestanding residential houses, zoned low density residential. The site is on the periphery of the Gordon town centre, and is in close proximity to shops, services and public transport.

It is proposed that the site be rezoned from RE1 Public Recreation to R3 Medium Density Residential, which permits multi-dwelling housing – which would be generally described as townhouse style development. The maximum height of buildings for medium density is 11.5m and floor space ratio is 0.8:1, compared to a maximum height of buildings of 9.5m and floor space ratio of 0.3:1 for low density residential.

It is considered that the proposal to rezone part of the site to R3 Medium Density Residential is compatible with the surrounding context and built form. The NSW Land and Environment Court Planning Principle Compatibility in the Urban Environment sets out the principles for considering whether a proposal is compatible with surrounding development. The most appropriate meaning of 'compatible' in relation to the urban environment is "capable of existing together in harmony". Compatibility is therefore different

from 'sameness' - that is - development does not need to be the same to be compatible. It is generally accepted that buildings can exist together in harmony without having the same height, density, scale or appearance.

<u>Open Space</u> – The need to provide open space for passive recreation is recognised within Gordon, and Kuring-gai as a whole. Council's Open Space Acquisition Strategy has been prepared to establish a series of principles for acquisition of land for local parks within priority areas. The priority areas are generally around the local centres and along the main road corridors where there is limited existing parkland and where new development is increasing the local population.

The Open Space Acquisition Strategy (OSAS) establishes principles and priorities for acquiring open space in Ku-ring-gai; a brief assessment of the subject site is undertaken below:

- **Location -** The site is located on the junction of priority 1 and 2 zones which might indicate that there is a need for a park in this location however there are three factors to consider:
 - there has been very little new development within walking distance (500 metres) of the subject site on the western side of the highway. With two heritage conservation areas to the south and north and a golf course to the west future significant development in the surrounds is unlikely.
 - Council has recently constructed a park (Greengate Park) on Bruce Avenue, which is approximately 500 metres from the subject site;
 - Council has resolved (OMC 5 April 2016) to develop the Gordon golf Course as a regional park, following the expiration of the lease of the Gordon Golf Club in 2023; the golf course is less than 350 metres from the subject site.
- **Size** The OSAS requires new parks to have an area greater than 3000m² to provide for maximum passive recreation opportunity. The subject is approximately 1.3Ha in size.
- Natural Systems There would be no potential conflicts between natural systems and recreation
 on the subject site
- Cultural heritage There would be no potential conflicts between heritage and recreation on the site
- **Visual and landscape quality -** The site does not have particularly high visual or landscape qualities that would enhance the recreational use of the site
- Accessibility The site is not in a prominent location and highly visible from public street and there
 is only two access points, one via a narrow walkway. The OSAS requires that new parks have at
 least 2 street frontages, the subject site does not comply with this requirement
- **Connectivity** The site would not provide potential to create new linkages between residential blocks
- Carrying Capacity The site does not extend or build on an existing reserve or system of reserves.
- **Economic Efficiency** Assessment of a walking catchment around the subject site indicates that a park in this location would not maximise the number of people within a 400 metre radius given the largely low density residential environment. Given the low levels of new development around the subject site a park in this location would be unlikely to meet S94 nexus criteria
- Management and Maintenance The subject site is likely to be affected by unacceptable risks such
 as contamination given the past use. This would dramatically increase the cost of construction of
 the park. Such costs are not budgeted for and must be avoided to ensure maximum funds are
 available to create new parks with high levels of facilities and amenities

Passive Surveillance - The location is not consistent with "Safety by Design" principles in terms of
passive surveillance. The subject site is surrounded on three sides by the back fences of adjoining
residential properties.

In summary when the site is assessed against the principles and criteria under the OSAS, the subject site is not considered suitable as a park primarily due to limited access and visibility as well as contamination risk.

Council is committed to providing additional open space within Gordon, and Ku-ring-gai as a whole. Council has been actively acquiring land over the past 10years for parkland in Wahroonga, Turramurra, St Ives, Killara, Lindfield and Gordon. A total of 20,000sqm of land have been purchased and much of this converted to new parklands. Council will continue to acquire sites that are better suited for the provision of open space needs of the community. To this end Council voted at the Ordinary Meeting of Council 13 March 2018 to establish a Gordon Public Realm Reference Committee to advise Council on community space issues particular to the suburb of Gordon. The reference committee will consist of Councillors, Gordon residents to be selected by a publicly placed advertisement, and a staff member.

Value and Yield -

- RE1 Public Recreation limited development options dwellings prohibited.
- R2 Low Density Residential subdivision of the site with an R2 zoning may result in approximately 15 lots.
- R3 Medium Density Residential may result in approximately 43 dwellings (dependent on dwelling size)

Considering the location and surrounding context it is recommended that medium density zoning be applied to the site as this represents the highest and best use of the site.

<u>Divestment</u> - Should the site be reclassified and rezoned, any future divestment would be subject to a separate Council Resolution, and would be undertaken in accordance with Councils Acquisition and Divestment of Land Policy 2014.

<u>Future Development</u> - Complying development for townhouse/terrace style development is unlikely to occur on the site under the Low Rise Medium Density Housing Code recently established by the NSW Department of Planning, as under the requirements of the code, each dwelling must face a public road. Due to the sites limited frontage to Pennant Avenue it is unlikely that development could occur under the code, unless a private road was established through the site.

A site specific Development Control Plan could be prepared for the site to ensure that any future development on the site responds to the essential elements that make up the character of the surrounding urban environment.

7 - CONSULTATION

Planning Proposals to reclassify public land are required to be publically exhibited for at least 28 days. A copy of the planning proposal, supporting studies and the Department of Planning and Environment's Practice Note PN 16-001 would be made available during the public exhibition. Surrounding properties would be notified of the public exhibition, and an advertisement placed in the North Shore Times.

Council must hold a public hearing when reclassifying land from 'community' to 'operational'. This gives the community an opportunity to expand on written submissions in a public forum. The public hearing is chaired by an independent chairperson. After the public exhibition has ended, 21 days public notice is required to be given before the public hearing. This allows the independent chairperson sufficient time to consider written submissions.

8- Assessment of Options

Option 1:

- Reclassify part of the site being Lot Y DP387680 from 'community land' to 'operational land'
- Rezone part of the site being Lot Y DP387680 from RE1 Public Recreation to R3 Medium Density Residential
- Apply a Floor Space Ratio of 0.8:1 to part of the site being Lot Y DP387680
- Apply a Maximum Height of Building of 11.5m to part of the site being Lot Y DP387680
- Retain the current RE1 Public Recreation zoning and 'community land' status of part of the site being Lot X DP387680.

Option 1 reclassifies and rezones part of the site, and retains part of the site as 'community land'. Retaining the smaller lot (Lot X DP387680) as 'community land', and the existing RE1 Public Recreation zoning will allow for this lot to be categorised as a Natural Area – Bushland under the *Local Government Act 1993* and managed through bushland plan of management. This would allow for the retention of the significant trees and vegetation on the site, while providing open space for passive recreation. This is will be an improvement to the current use of this part of the site – which is utilised for vehicle access into and out of the site.

Option 2:

- Reclassify the whole site being both Lot X DP387680 and Lot Y DP387680 from 'community land' to 'operational land'
- Rezone the whole site from RE1 Public Recreation to R3 Medium Density Residential
- Apply a Floor Space Ratio of 0.8:1
- Apply a Maximum Height of Building of 11.5m

Option 2 reclassifies and rezones the whole site. Lot X DP387680 (the smaller lot) is currently mapped as Biodiversity Significance and contains trees and vegetation identified as Sydney Turpentine-Ironbark Forest. In any future development across both lots, the KLEP 2015 seeks to retain and protect the significant vegetation, which would limit the development potential on Lot X . Accordingly, this would result in the transfer of the allowable floor space ratio from Lot X to be used on the main part of the site. This would potentially result in a denser development with increase bulk and density, and compromise the amount of deep soil and landscaping opportunities on the site.

9- CONCLUSION

4 Pennant Avenue Gordon is currently zoned for public recreation purposes, and the site has been historically utilised by the Gordon Bowling Club. Due to declining membership, the club terminated their lease with Council and vacated the property in early 2018.

The sites future use under the current RE1 Public Recreation zoning is not considered the highest or best use of the site. The co-ordinated and orderly use of the land would be best facilitated by reclassifying part of the site to 'operational land' and rezoning to medium density residential to provide greater housing supply and choice while still being compatible with the surrounding context and built form.

When the site is assessed against the principles and criteria under the Open Space Acquisition Strategy, the subject site is not considered suitable as a park, primarily due to limited access and visibility as well as contamination risk.

It is recommended that **Option 1** be the preferred option for the Planning Proposal.

There is sufficient strategic and site specific merit for the reclassification and rezoning of the site.