

DRAFT CUDGEGONG ROAD STATION DRAFT STRUCTURE PLAN

SUBMISSION BY ROUSE HILL HEIGHTS ACTION GROUP INC

PREAMBLE

Rouse Hill Heights Action Group Inc (RHHAG) is a community organisation representing the majority of landowners in the Cudgegong Road Station Study Area.

RHHAG was formed in 2005, when the then NSW Government proposed making the area a part of the Landscape and Rural Lifestyle Zone (the “Green Zone”). Since then, RHHAG has represented its members on many issues, and also joined forces with other Residents’ Action Groups to tackle issues affecting us all.

As well as the Green Zones, some of the issues RHHAG has been active on include the upgrade of Feeder 9JA; the 1 in 100,000 year flood zone; the attempt to change the name of our suburb to Vinegar Hill; the amendment of the Area 20 Precinct boundary; the proposed siting of a Transmission Tower in a residential part of Area 20; the imposition of the Very Low Density zoning in parts of Area 20; and the negative impact of the vista from Rouse Hill House on valuable housing land in the Study Area. While RHHAG looks after the interests of its members, the driving force behind our agendas has never been nimbyism. We have only campaigned against what is unfair, and have never demanded something which could be seen as greedy.

RHHAG has noted with interest that the Study Area has been identified by the Departments of Planning and Transport as an important and stand alone part of the North West Growth Centre. RHHAG has campaigned for years that this very area identified should be seen as one area, as it has unique characteristics which set it aside from Riverstone East.

RHHAG’s submission may be different from that of our members, but we have recommended what we believe is the best planning practice and will provide the best outcome for our members. We have encouraged our members to put in submissions, and we will forward on those that we have received.

RHHAG members have lived in this area for up to 50 years, and have an in depth knowledge of the Study Area. RHHAG has supplied submissions to almost all of the planning documents affecting the Study Area since 2005.

We recommend that the people compiling the plans for the Study Area talk to RHHAG before making any final decisions affecting this area.

ROUSE HILL HEIGHTS ACTION GROUP INC SUBMISSION

OVERVIEW:

RHHAG agrees with most of the Draft Structure Plan, in that the Study Area is prime housing land, close to all facilities. However, we feel that:

- There are many inaccuracies in the document;
- 6 storey medium density living will only work in the immediate environs of the station, village centre, and the triangle bounded by Windsor & Schofields Rds and Second Ponds Ck;
- The success of The Ponds development shows the popularity of 450+ sq m housing blocks, rather than medium or high density so far from the CBDs of Sydney, Parramatta, Chatswood, etc; People may buy Medium or High Density units, but usually only if it is in a CBD; or there is nothing else available; or they come from a culture where high rise living is the norm;
- Poor planning principles are evidenced in the waste of valuable housing land zoned as Very Low Density within 800 metres of the Village Centre; this zoning should be scrapped;
- The protection of the “vista” from Rouse Hill House is unnecessary and artificial, and has a negative effect on the amount of housing land available in the Study Area;
- The expansion of the Tallawong Road Stabling Yard means the waste of valuable housing and employment land close to all facilities; the success of Norwest Business Park has shown that people want to work close to home and transport, so these employment lands are needed;
- There are very few real constraints on the land contained in the Study Area, and thus almost all of the land can be utilised for housing and employment;
- There will be an issue with commuter parking around Cudgegong Station, as Rouse Hill station will have no additional spaces, and the parking provided at Rouse Hill Town Centre and Cudgegong Station will not cope;
- The retention of trees in the study area is not an issue, as most of the trees are regrowth; the Study Area is not identified on the Terrestrial Biodiversity Map; Sydney Water cleared many trees for Cudgegong Reservoir; it seems Blacktown Council is to sell or develop Cudgegong Park (mentioned P&D meeting 24th 2013) so there is precedence that trees don’t have to be kept;
- RHHAG was told by a member of the local Darug tribe that the bulk of the Study Area was cleared at the time the white man arrived in 1788, and there are many documents showing that the trees were cleared and regrew many times since Richard Rouse acquired the land;
- Riverstone East Precinct should be gazetted as soon as possible, and the infrastructure for Riverstone, Riverstone East, Alex Ave and Area 20 Precincts fast-tracked.
- Cudgegong Road village centre needs to be complementary to the Rouse Hill Town Centre.

1. **INACCURACIES CONTAINED IN THE DRAFT DOCUMENT**

Section 1.2.2 of the Draft Structure Plan states that “a comprehensive site analysis has been undertaken” of the Study Area. RHHAG feels that much the information contained in Section 2, Opportunities and Constraints Analysis, is incorrect. We wonder if any of the planners have actually visited the Study Area, or whether they simply made plans based on Google Maps and outdated aerial maps.

Certainly no legal ground truthing has been done by the Government. Some of the residents paid for ground truthing to be done when the land was proposed to be frozen under the Landscape and Rural Lifestyle debacle, which showed no noteworthy vegetation; and many landowners sent in submissions stating the true nature of the vegetation on their land.

RHHAG also claims that the map shown as Figure 20 is inaccurate, as the circles don't match the scale in the BLC. Either the scale diagram is wrong or the circles are. We have attached 2 maps, one based on the scale and one showing the village centre as the centre of the circle.

Since this draft document was prepared, the NSW Government has announced the release of the Riverstone East Precinct. However, most landowners are unaware of the announcement. RHHAG has repeatedly told the NSW Department of Planning that acreage landowners do not get the local paper. We have heard that people are going around to landowners in the Riverstone East Precinct, asking if they are interested in selling their property. RHHAG calls on the Planning Department to gazette the release of Riverstone East Precinct immediately, and write to all the landowners informing them of the release.

The photos in Figures 4 and 13, purporting to show the character of the Study Area are completely inaccurate. Most of the seven photos just show the area around the proposed station on Cudgegong Road, and two are of the Electricity Switching Station opposite the station site. We have attached some photos to show a more accurate representation of the character of the Study Area.

Also since the draft document was prepared, plans have been made to greatly increase the size of the Tallawong Road Stabling Yards. This is poor planning as it significantly reduces the amount of Employment Lands available in the Study Area.

Section 1.3 talks about the goal “to locate 80% of all new housing within walking distance of centres, like the Cudgegong Road village centre, that have good public transport” but even the inaccurate map shows around 15 hectares, located less than 800 metres from this centre, zoned as Very Low Density, limiting it to one house every 2,000 sq metres. This is poor planning and in complete contrast to NSW Planning’s stated goals.

The structure plan is inconsistent and lacks clarity, as it is unclear what is actually allowed/ planned for R2 and R3. As well, housing numbers stated in 4.2 and 5.4 in the document don’t add up, and point to densities as low as 3 homes per hectare in parts of the Study Area!

2. **TALLAWONG ROAD STABLING YARD**

The increased Stabling Yard now takes at least two-thirds of the Employment Lands shown in Figure 20, cutting the additional jobs by about 3,000. This is again poor planning, for the proposed Employment Lands are next to a proposed Railway Station (Cudgegong Road); adjoin a major road with bus lanes and good transport links through to the Richmond Rail line, Richmond Road and the Marsden Park Employment and Housing Precincts (Schofields Road); and front a proposed feeder road, Tallawong Rd, which goes through to Garfield Rd.

The success of the employment lands at Norwest Business Park has shown that there is a need for more employment lands, and Section 5.4 of the draft document stated that it was anticipated that of the original 4,400 jobs, “96% ...would be realised”. It is a mistake to lose that much valuable employment land providing so many jobs.

3. **HOUSING DENSITIES**

RHHAG has concerns about Section 6.1, where it states that “current parking policies and minimum apartment sizes” may need to be revised. The Study Area is approximately 45 kilometres from the Sydney CBD, and small apartments and restricted parking spaces are not appropriate in the outer north-west.

There may be a need for a small number of these sorts of apartments immediately adjoining Cudgegong Station, as retirees may wish to downsize close to their children and grandchildren. However, young people and childless couples will want to live closer to the CBD, Parramatta, etc. Families will want a free standing block with room for children to play.

The recent success of the 28 storey building in Parramatta is interesting. The Sunday Telegraph, 28th April 2013, stated that “95% of the buyers were local Chinese”. They may be used to living in high density apartments, but it appears that they were virtually the only ones who wanted to do so.

As well, most people in outer suburbs have their own car, even if they live next to a train station or Transitway. Public transport is only attractive if it takes you where you want to go, when you want to go there.

The feedback from developers about the R3 zoning in Area 20 has been negative. They state that people want free standing homes on good size blocks, as evidenced by the success of the developments in The Ponds. So if the Government allows too many of these small blocks or medium density apartments with very limited parking spaces, there is the very real risk that they will be left unsold, or become a ghetto.

RHHAG's analysis of the inconsistent housing numbers proposed for the Study Area in 4.2 (3,000 dwellings including 2,500 in Area 20) and 5.4 (3,500 dwellings including 2,500 in Area 20) means that there will be only 500 or 1000 homes located in the 200 hectares of the Study Area which is outside the Area 20 Precinct.

Even allowing for 40 hectares for the Employment Lands/ Stabling Yard, this means there will be 500-1000 homes located in 160 hectares, which is only 3 - 6 homes per hectare!!!! !! What type of good planning principles proposes such low densities next to all facilities and infrastructure?

RHHAG proposes the following:

- The village centre be taken as the centre of the 400 and 800 metre circles, as this is the accepted planning norm, and is mentioned on p5 of the document, section 1.3;
- 6 storey apartments immediately adjoining Cudgegong Station and the village centre, and between Windsor Road, Schofields Road and Second Ponds Creek;
- Apartments decreasing in size down to 3 storeys until they reach the 400 metres radius from the village centre;
- No apartment blocks to be inward facing, as this type of development failed in Mt Druitt and in Sydney's South-West;
- That Low Density detached dwellings, and Medium Density Townhouse and Apartment Living, all be allowed in the 400-800 metres radius of the circle, with the type of development to be decided by demand;
- That Low Density blocks of 350-650 sq metres be allowed in the area outside the 800 metre radius of the circle;
- That the Very Low Density Zoning be removed, and replaced with the appropriate zoning as listed above;
- That block and apartment sizes be consistent with those popular in outer suburbs, and that there be adequate parking spaces provided;
- The vista from Rouse Hill House not have any effect on any land outside the Rouse Hill Regional Park, unless that land is Infrastructure or Drainage, or parkland;
- Ensuring transition between densities which would provide better cohesion between differing developments and improved streetscape consistency.

4. RETAINING TREES

RHHAG notes that none of the privately owned land in the Study Area is identified on the Terrestrial Biodiversity Map, and therefore the trees do not have to be preserved. We have attached to this submission, copies of statements from people who have lived or worked in this area since the 1940s, saying that most of the trees were cleared by the time the final subdivision of the Rouse Estate occurred in the 1970s. Therefore any trees which remain are regrowth, and of little value.

We also note that Sydney Water was able to clear a large amount of trees to build the Cudgegong Reservoir. We also note that the best preserved patch of trees in the Study Area, Cudgegong Park, is proposed to be bulldozed/sold for housing by Blacktown Council.

5. THE VISTA FROM ROUSE HILL HOUSE

RHHAG assumes that the land zoned as Very Low Density (VLD) is zoned such because it is thought to be within the vista from Rouse Hill House. However, only some of these blocks are shown to be completely contained within a “Very High Potential Visual Impact” area (Figure 15, p 28, “Area 20-Landscape and Visual Analysis including Rouse Hill Estate Curtilage”, Conybeare Morrison, March 2010.) Why then, are all of these blocks included in the VLD zone, especially when they are all situated within 800 metres of the proposed Cudgegong village centre?

RHHAG disputes that these properties will be seen from Rouse Hill House (RHH) at all. The Curtilage should not include any properties which can be seen from anywhere other than the front of the property. “While other early colonial homesteads overlooked their crops or pastures, Rouse Hill has always overlooked the busy Windsor Road.” (Historic Houses Trust, “Rouse Hill House & Farm Guidebook, A Brief History.”) Windsor Road has never been frozen because of the vista from RHH – in fact it has been re-sited, and there are plans for an industrial precinct directly in the line of sight from RHH-why should our area be stunted?

Good planning principles cannot be over-ridden by an artificial and inaccurate attempt to freeze this vista. The irony is that the very uniqueness of RHH is that it was never frozen in time- the house and its grounds continued to develop and change during its ownership by the Rouse and Terry families. If the family still owned the property, it would have continued to change, as would the vista.

It should be noted that RHH currently overlooks several electricity transmission lines, a Telecommunication Tower, several water towers, Rouse Hill Regional Centre, a commercial centre and several housing estates. Under the ISEPP, all infrastructure is allowed in the Study Area, so sewage, water treatment and water desalination plants would also be allowed, along with nuclear reactors!

The fairest way to stop RHH from having to overlook family homes is to have trees along the boundary of the Regional Park, along the roads and ridgelines.

6. OPPORTUNITIES AND CONSTRAINTS

Figure 18 on p 20 of the draft document shows almost all of the Study Area as an Opportunity Site.

RHHAG agrees with this, as due to our local knowledge,

- The mapping of vegetation is not accurate;
- A lot of the vegetation is exotic species;
- Many of the native trees are suffering dieback or in other ways unhealthy;
- There has never been a bushfire in the study area, and it will be even less likely when the area is cleared for housing; if Feeder 9JA had been put underground, it would be non-existent;

- Flooding is limited to the lands along First and Second Ponds Creek, and has really only affected the causeway on Rouse Road, and to a lesser extent along Schofields Road from Second Ponds Creek; First Ponds creek is outside our immediate knowledge, but does have more serious flooding;
- The electricity easement does have a constraint, and should have been undergrounded when the upgrade took place a few years ago;
- However, the expanded Stabling Yard is now a major constraint on development.

7. EARLY GAZETAL OF RIVERSTONE EAST PRECINCT

RHHAG assumes that work has already been done on planning for the Study Area, and should have started on the rest of Riverstone East Precinct. It is essential that the release of the land be gazetted immediately, and all landowners in the Precinct immediately advised that their land has been released.

At the very least, the remainder of the Study Area should be rezoned within the next few years, so that when the railway arrives, the employment lands, village centre and homes are there at the same time. The Study Area is already surrounded by infrastructure – it adjoins Schofields and Windsor Roads, which have been or are being upgraded; contains the Rouse Hill Regional Park and the Rouse Hill Anglican School; is situated immediately adjacent to Rouse Hill Village Centre, Rouse Hill Town Centre and the Transitway; and has buses connecting it to the Richmond rail line and Rouse Hill Town Centre and the Transitway, allowing public transport to Norwest Business Park, Blacktown, Parramatta and Sydney CBD.

The NSW Government just needs to ensure that the supply of water and sewer to all the released and rezoned precincts is fast-tracked.

8. PLANNING CONTROLS

The new Planning Controls must be carefully decided, taking into account what buyers want, and what will sell in the area.

RHHAG has the following views:

- Building heights should vary from 18 metres down to 9 metres;
- The Stabling Yard should be relocated, or at least be only be a small temporary facility, to allow for more Employment Lands and housing;
- R3 zones should be allowed to downsize, that is, allow stand alone homes on 450 metre blocks as well as medium density if the demand is there;
- R2 should be stand alone blocks of 350-650 sq metres, which will allow backyards and the retention of trees;
- Floor space ratio should not apply to low density lots, and should be of an adequate size in the Medium Density lots;
- There should be adequate car spaces provided in the Medium Density apartments, of at least one space for every 2 bedrooms.

9. OPPORTUNITIES FOR GROWTH

Virtually all of the Study Area is prime housing and or employment lands, and is walking distance from the proposed village centre, as evidenced by Figure 5. As the draft document states on p30, the Study Area already affords such a “high level of amenity and quality of life”, that once the NWRL comes through, “the take up/realisation rate is considered to be 81% for housing and 96% for employment.” RHHAG considers that if the right zonings are in place, the take up rate for housing will be closer to 96%, as evidenced by the popularity of the neighbouring area of The Ponds.

However, the constraint imposed by the Stabling Yard must be removed. Also, there must be serious consideration given to the amount of commuter parking provided for Rouse Hill and Cudgegong Stations, so the situation currently being faced by Schofields Station does not occur here, where the roads surrounding the station are clogged by commuter cars.

As well, there must be efforts made to ensure that the Cudgegong village centre is designed so that it is not driven out of business by its larger neighbour just down the road, Rouse Hill Town Centre. A village centre full of empty shops creates social problems, and makes the surrounding homes less desirable. Please learn from the mistakes of Mount Druitt.

CONCLUSION

Government should remain proactive in planning in an efficient and timely manner and in accordance with plans which have been presented to and subjected to inputs from the local community. So many times in the past, government has said it has consulted with the community when it has told the community what is to happen as arrangements have already been made. All actions should be transparent and in the best interests of the whole community, to ensure sustainable, healthy and liveable communities in the Growth Centres.

The development of the Study Area should be undertaken with the emphasis on good planning principles, while providing people with the types of home sites that they want, rather than forcing something onto them.

Land can be made more affordable by not inflicting almost \$200,000 of various charges from all three levels of Government onto every house lot.

The RHHAG executive is happy to meet with anyone from the Departments of Planning and Transport or the Growth Centres Commission, to take you through the Study Area and give you the benefit of our local knowledge.

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