



## Cudgegong Local Centre

Submission to Exhibited  
Draft Area 20 Planning Controls

19 DECEMBER 2014

Project:	Cudgegong Local Centre		
Document:	Submission to SRGCC		
Revision:	Date:	Authored By:	Approved By:
Final	19/12/14	Jason Duda Mark Raikhman	

V:\14-042 43 & 53 Cudgegong Road Rouse Hill\Working\Reports\Submission to SRGC Commission

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## 1.0 Introduction

This submission makes recommendations for amendments to exhibited draft planning controls for Lots 72 and 73 in DP 208203 (see Figures 1 and 2) which is a key site in the proposed local centre in Area 20 Precinct of SEPP (SRGC) 2006 (see Figure 3). Recommendations are also made with regards to proposed amendments to Council Growth Centres Precinct Development Control Plan (DCP).

The exhibited draft amendments to the SEPP include:

- Rationalise the land use zoning of the site; and
- Increase the maximum building height on the site to twenty-six metres.

The exhibited draft amendments to Schedule 4 – Area 20 Precinct of the DCP:

- Finalise built form planning controls for the Cudgegong Local Centre (of which the subject site forms a part); and
- Finalise the Desired Future Layout (draft DCP, Schedule 4 – Area 20 Precinct, Fig. 4-2, p 27) for the Cudgegong Local Centre.

In response to the exhibited draft controls, we have conducted an investigation of permissible building envelopes and made the following findings:

- At maximum height as per existing controls, the development has an FSR of 1.51:1, a gross underdevelopment as compared to the permitted 2.75:1.



Figure 1: Site boundary

- At maximum height as per exhibited draft controls, the development has an FSR of 2.37:1, also an underdevelopment as compared to the permitted 2.75:1.
- At maximum FSR (2.75:1), the maximum height is up to twenty-two metres greater than existing controls and up to fourteen metres greater than exhibited draft controls.
- The Desired Future Layout cannot be achieved due to:
  - Assumptions regarding ownership and development of Lots 71, 72 and 73 in DP 208203. At present, Lots 72 and 73 in DP 208203 are in separate ownership though the owners intend to develop as one. This creates an opportunity for the development of the largest portion of the local centre.
  - Building separation provisions of the Residential Flat Design Code (RFDC) and setback requirements of the Blacktown City Council Growth Centre Precincts DCP 2010.

An amended scheme, substantially the same as desired by the Desired Future Layout is proposed as part of this submission. It is based on the following key concepts:

- Amalgamation of Lots 72 and 73 in DP 208203, excluding Lot 71.
- RFDC compliant building depths and building separation.
- DCP compliant street, side, rear and upper level setbacks.



Figure 2: Lot boundaries



- Retail GLA exceeding the 9,500m<sup>2</sup> recommended by Leyshon Consulting as part of their Retail Planning Advice for Area 20 (Department of Planning & Infrastructure 2011, Post Exhibition Planning Report, Appendix C, p ii) to increase opportunities for a greater variety of uses (e.g. medical, fitness, health and day-care centres).
- Reduced active street frontage to reflect the scale of the town centre.
- Increased residential density in order to implement principles of transit-oriented development and a vital and vibrant town centre.

In order to implement the amended scheme, we seek the amendment of planning controls as follows:

- Exhibited draft SEPP (SRGC) 2006 maps:
  - Maximum height:
    - Lot 72 in DP 208203: 26m and 35m
    - Lot 73 in DP 208203: 35m and 50m
  - FSR:
    - Lot 72 in DP 208203: 3.5:1
    - Lot 73 in DP 208203: 3.5:1
- Exhibited draft DCP (particular reference to Schedule 4 – Area 20 Precinct) by way of adoption of the proposal which includes:
  - Altered road network;
  - Main Street section; and
  - Building layout.

Further detail in relation to the proposed changes to the exhibited draft DCP are found in Section 4.0 of this report.

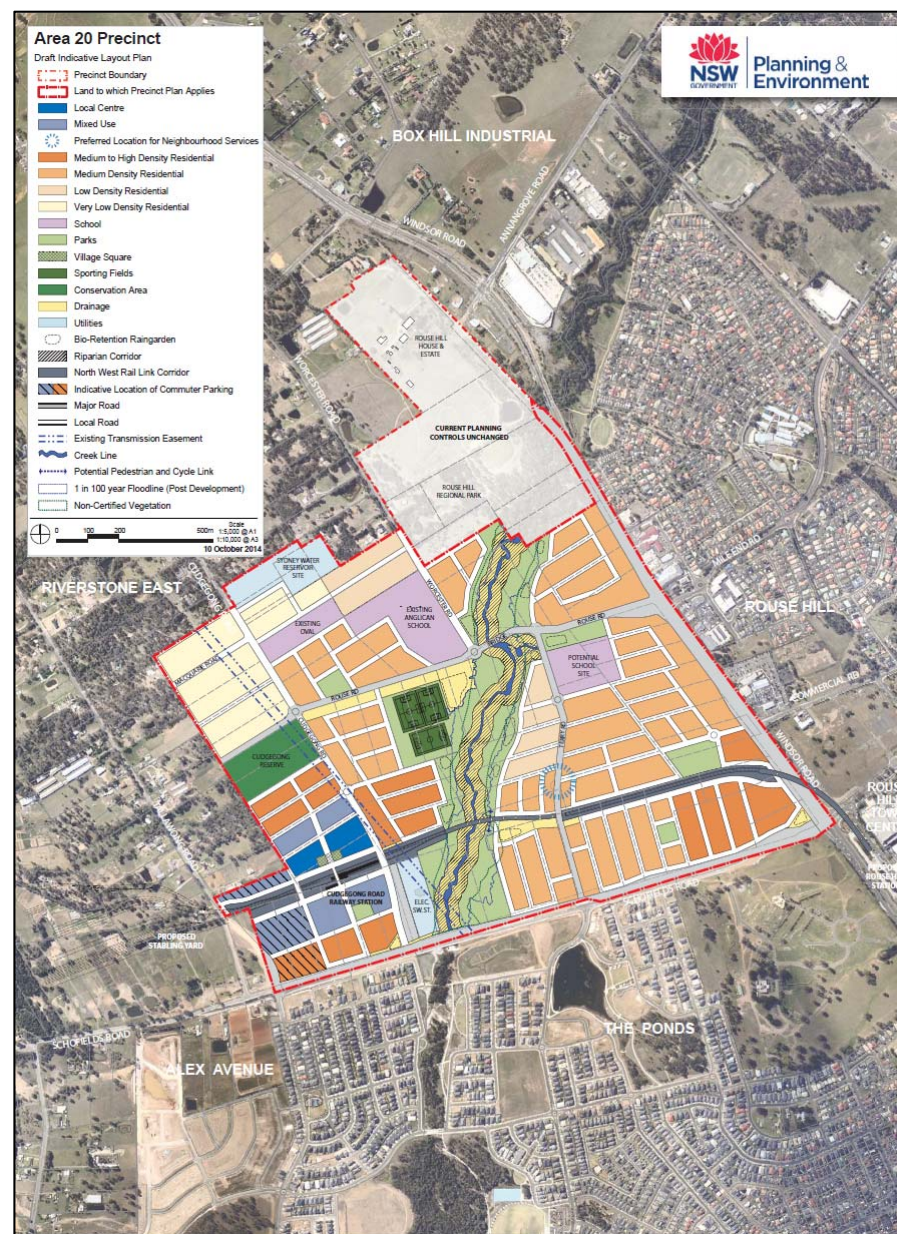


Figure 3: Draft Indicative Layout Plan (Department of Planning 2014)



## 2.0 Context

As seen in Figure 4, the subject site is located within Area 20, which is:

- Adjacent to new release area Rouse Hill, with The Rouse Hill Town Centre being 2.3km drive east along Schofields Road from the subject site.
- Adjacent to new release area The Ponds, with allotments forming part of the suburb located 500m drive south along Cudgegong Road.
- Proximate to growth centres:
  - Box Hill (and Box Hill Industrial Precinct) directly to the north.
  - Alex Avenue directly to the south-west (retail centre 4.2km drive west along Schofields Road).
  - Riverstone East directly to the west (undergoing precinct planning process).
  - Schofields 4.5km west along Schofields Road.
  - Riverstone and Riverstone West 6.2km west along Garfield Road East.
  - Marsden Park 9.3km west along Schofields Road and Grange Avenue.

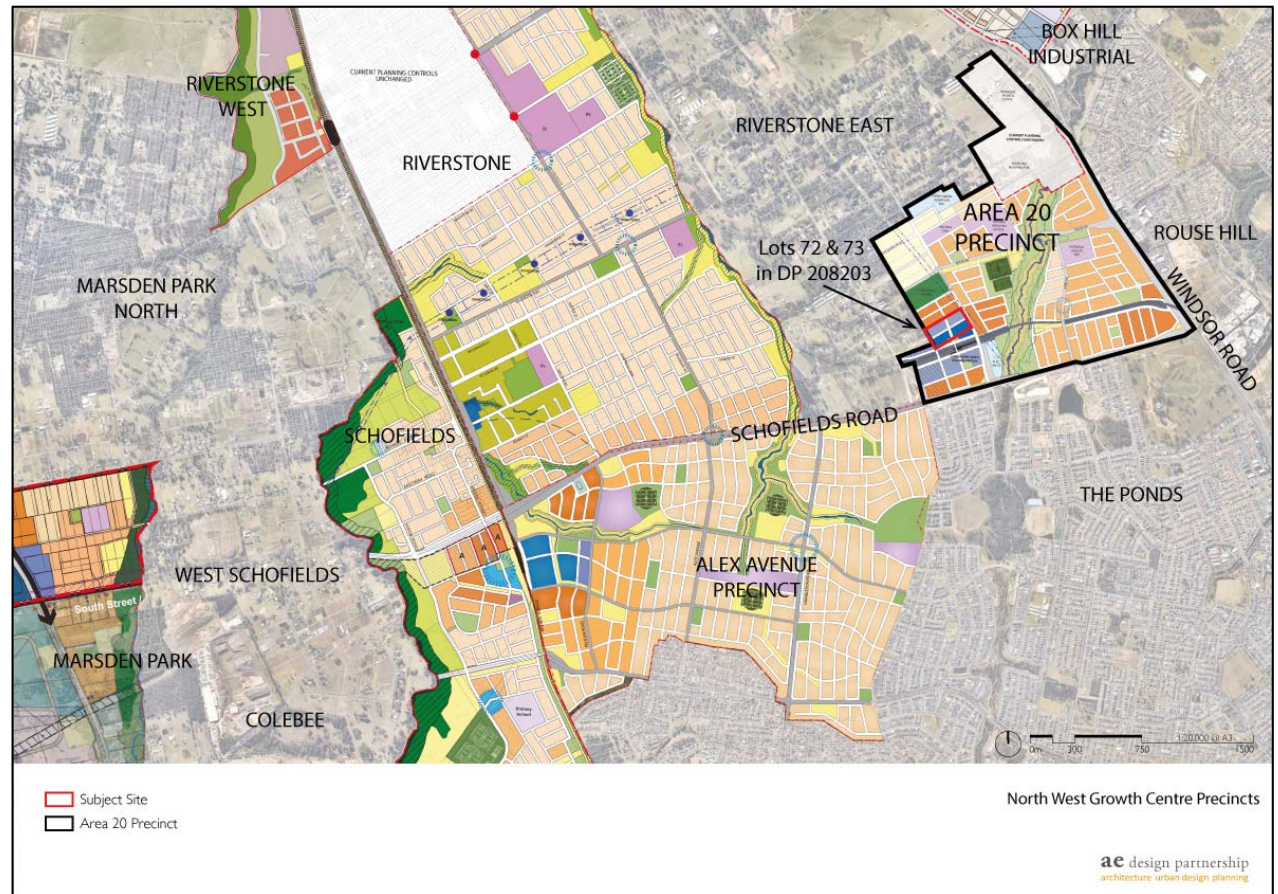


Figure 4: Area 20 and proximate growth centres

The subject site forms part of the Cudgegong Station Area under the SEPP and the Cudgegong Local Centre under the DCP 2010.

A fall in topography occurs from the north-western corner of the site to the south-eastern corner.

As seen in Figure 2, Area 20 is presently occupied by predominantly rural-residential uses.

## 3.0 Planning Background

Area 20 was rezoned in the October 2011 for urban purposes as part of the North West Growth Centre.

In 2014, finalisation of the North-West Rail Link Corridor and changes to the acquisition authority for trunk drainage corridors within the Rouse Hill Development Area enabled the finalisation and exhibition of SEPP, DCP and Indicative Layout Plan. The changes are on exhibition with Department of Planning until the 19<sup>th</sup> of December 2014.

A comparison of current and amended planning controls are tabled in Table 1.

Table 1: Current and Exhibited Zoning Controls

Lot No.	Land-Use Zoning		FSR		Maximum Height	
	Current Controls	Exhibited Draft Controls	Current Controls	Exhibited Draft Controls	Current Controls	Exhibited Draft Controls
72	B2 Local Centre at western portion; B4 Mixed Use at eastern portion.	B2 Local Centre	2.75:1	2.75:1	18m	26m
73	B4 Mixed Use at northern and north-eastern portion; B2 Local Centre at south-eastern corner.	B4 Mixed Use	2.75:1	2.75:1	18m	26m



## 3.0 Town Centre Plan

The exhibited draft DCP includes a Desired Future Layout for the Cudgegong Local Centre (Figure 5), defined by:

- Cudgegong Road at the eastern boundary;
- Schofields Road at the southern boundary;
- Tallawong Road at the southern portion of the western boundary;
- A proposed road along the northern boundary of Allotment 70 in DP 30186;
- A proposed road along the western boundary of Lots 72 and 73 in DP 208203; and
- A proposed road along the northern boundary of Lot 73 in DP 208203.

The future North West Rail Link Corridor, finalised as part of the exhibited draft amendment, creates a clearly defined boundary between the northern and southern portions of the town centre. The subject site is located within the northern portion, defined by:

- Cudgegong Road at the eastern boundary;
- The proposed Railway Street North at the southern boundary;
- A proposed road along the western boundary of Lots 72 and 73 in DP 208203; and
- A proposed road along the northern boundary of Lot 73 in DP 208203.



Figure 5: Desired Future Layout (Exhibited draft DCP, Schedule 4 – Area 20 Precinct, Fig. 4-2, p 27)

## 3.1 Urban Structure

- The east-west road along the common boundary of Lot 72 and 73 in DP 208203, the Desired Future Layout assumes that each allotment is in separate ownership.
- While Lots 72 and 73 in DP 208203 are in separate ownership, the owners intend to develop together.
- This creates an opportunity to develop the site such that block sizes are large enough to accommodate two supermarkets, as well as associated specialty shops and parking.
- This also provides the opportunity to develop in a staged sustainable manner as the growth area develops.

## 3.2 Land Use

The zoning, (Lot 72 - B2 Local Centre and Lot 73 - B4 Mixed Use) creates an opportunity to develop a town centre with:

- Retail being located predominantly towards the southern portion of the site, proximate to the future Cudgegong Railway Station.
- Residential in the form of shop-top housing within southern portion of the site and residential flat buildings within the northern portion of the site.

## 3.3 Street Frontages

- The DCP requires active street frontages to the proposed Cudgegong Local Main Road. The length of active street frontage (approximately 180m) is considered to be excessive, as compared to town

centres of similar size with a much larger primary retail catchment.

- This creates an opportunity to prepare a revised scheme with a shorter length of active street frontage, consistent with Cl. 4.1.1 of exhibited draft DCP (Schedule 4 – Area 20, p 28), requiring *“fine grained and intensive retail and commercial uses that present an active street frontage ... along the Main Street”* within a *“compact, mixed use centre”*.

## 3.4 Built Form

Testing of building envelopes consistent with the DCP Desired Future Layout found that the layout could not be achieved due to inconsistency with:

- RFDC building separation and depth provisions, and
- DCP setback requirements to the following streets:
  - Cudgegong Road (s 3.0, Fig. 3-11, p 50).
  - Cudgegong Local Main Road (exhibited draft Schedule 4 – Area 20 Precinct, Fig. 4-6, p 36).
  - Local streets, i.e. all streets excluding Cudgegong Road and Cudgegong Local Main Road (s 3.0, Fig. 3-12, p 51).

Figures 6, 7 and 8 show building envelopes as a result of built form testing. These have shown there to be a mismatch between maximum height of buildings and maximum FSR. The results are shown in Table 2.

Table 2: Height, FSR and dwelling yield per building envelopes

Scheme	Figure	Height (storeys)		Height (m)		FSR (n:1)	Dwellings
		Lot 72	Lot 73	Lot 72	Lot 73		
Current controls (Limited by Max. Height)	6	5	5	18	18	1.51	529
Exhibited Draft Controls (Limited by Max. Height)	7	8	8	23	23	2.37	874
Exhibited Draft Controls (Limited by Max. FSR, exceed Maximum Height)	8	7	13	21	40	2.75	1029



In summary:

- At maximum height as per existing controls, the development has an FSR of 1.51:1, a gross underdevelopment as compared to the permitted 2.75:1.
- At maximum height as per exhibited draft controls, the development has an FSR of 2.37:1, also an underdevelopment as compared to the permitted 2.75:1.
- At maximum FSR (2.75:1), the maximum height is up to twenty-two metres greater than existing controls and up to fourteen metres greater than exhibited draft controls.
- Dwelling yields as per each Figure are insufficient to support a *“compact, mixed use centre with a high level of public transport accessibility to Cudgong Road Station”* and demonstrate *“the important principles of Transit Oriented Development”* (Point (10) of Cl. 4.1.1).

This creates an opportunity to redevelop the site such that:

- Is consistent with the RFDC and DCP controls.
- Does not include an east-west road along the common boundary of Lots 72 and 73 in DP 208203, permitting a podium and tower development either side of the future Cudgong Local Main Road; and reducing on-going costs for local government.
- Alleviates the mismatch between height and FSR.
- Maximises implementation of Transit Oriented Development principles (as per Point (10) of Cl. 4.1.1).

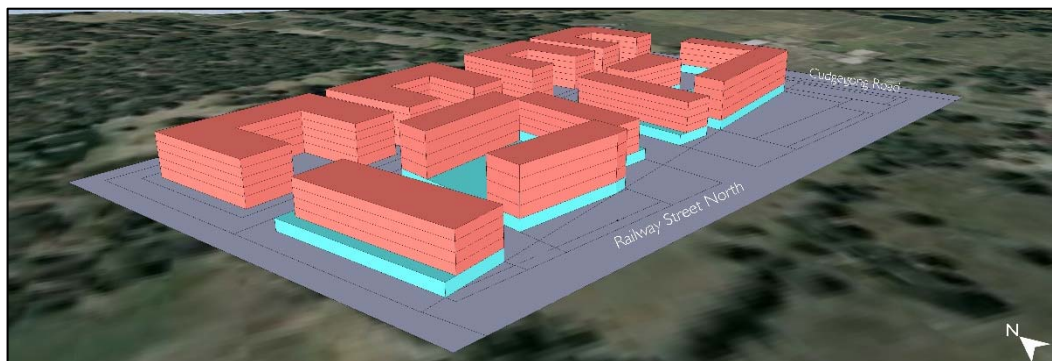


Figure 6: Building envelopes as per maximum height permitted by current controls

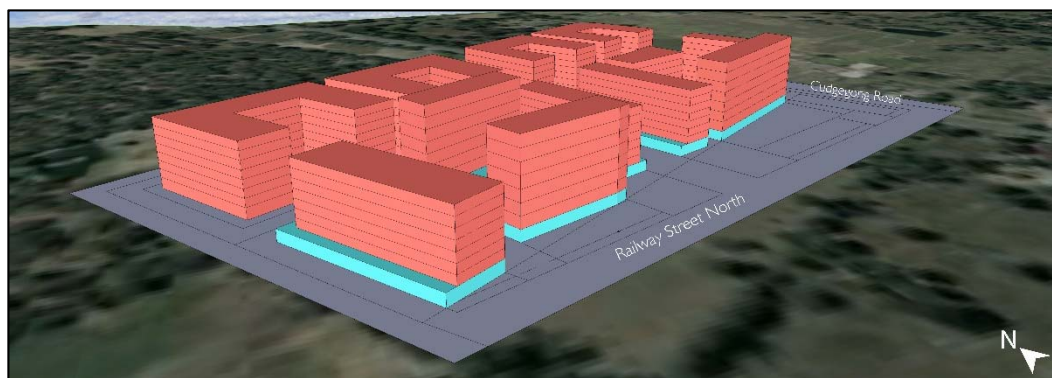


Figure 7: Building envelopes as per maximum height permitted by exhibited draft controls

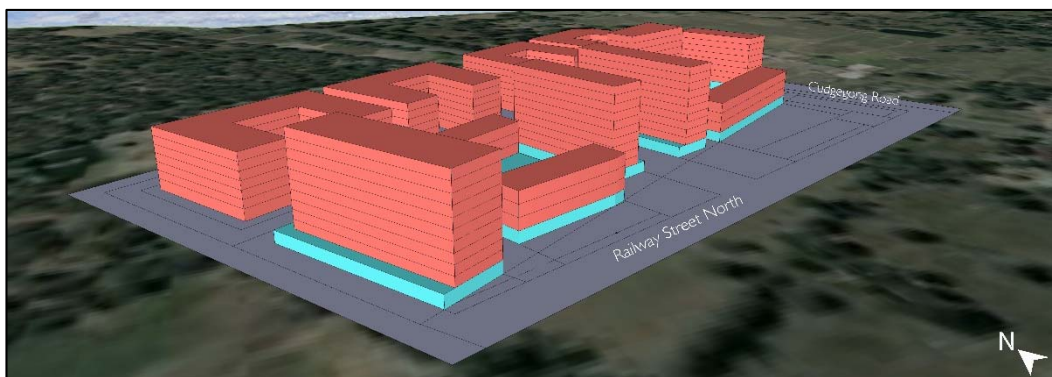


Figure 8: Building envelopes as per maximum FSR

## 3.5 Open Space

The key components comprising the open space system include:

- Two public squares at the intersection of Cudgegong Local Main Road and Railway Street North (Refer to Number (3) in Figure 5).
- Railway Street North, Cudgegong Local Main Road and streets bounding the northern portion of the Cudgegong Local Centre.

### 3.5.1 Village Squares

A variety of transportation methods converge at the Station as seen in Figure 4-7 DCP 2010 (Schedule 4 – Area 20 Precinct, p 37):

- Rail (NWRL);
- Buses;
- Private vehicles; and
- Pedestrian and cycle.

The proposed squares are to provide an appropriate landscaped open space treatment, benefitting commuters and the community through increased opportunities for social interaction, recreation, entertainment and alfresco dining. Crucially, the European style town square envisaged by Figure 4-7 enables the pedestrian to remain the most important traveller through the junction.

Although only the small, northern portions of the planned village squares form part of the subject site, there is an opportunity to address these (through active street frontage) as part of future development within the subject site.

### 3.5.2 Streets

Cudgegong Local Main Road contributes to the open space network through a landscaped treatment north from the village squares. The indicative street section is shown in Figure 9.

While the proposed road network as shown in Figure 5 will allow a permeable network, it results in excessive road pavement area that will need to be built and ultimately maintained by Council. The draft DCP proposed street structure has significant cost implication for both the developer and Council.

The draft DCP proposed street structure also leads to additional perimeter building edges which are difficult to activate due to the limited retail and commercial capacity of the centre, there would also be service areas. By reducing perimeter building edges and internalising service areas, pedestrian activity can be focused in the village square and streets leading from the station.

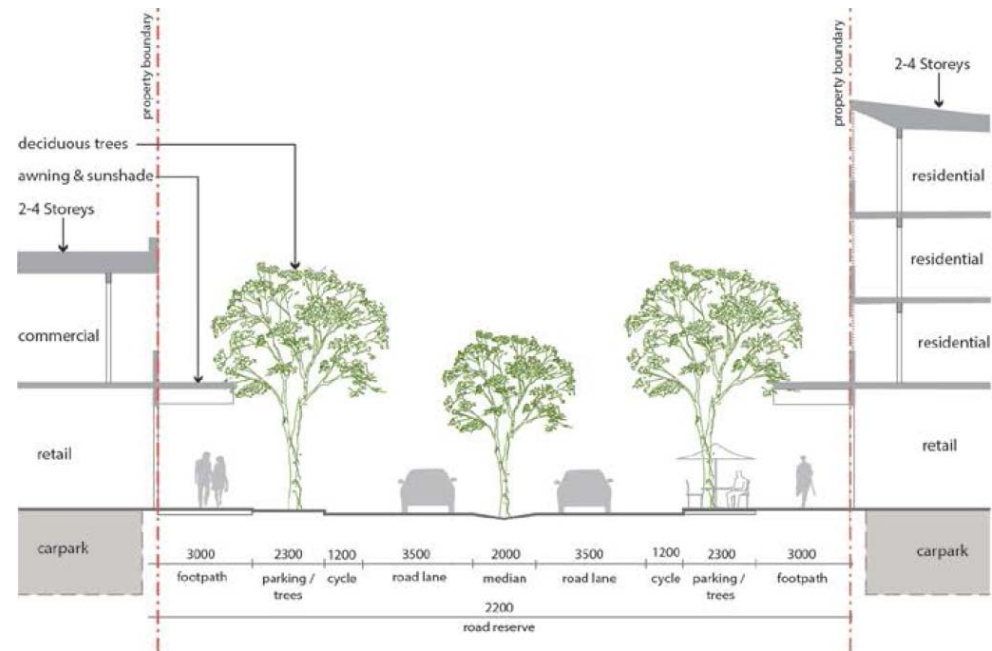


Figure 9: Figure 4-6 Indicative Cudgegong Local Centre Main Road Street Section (DCP)



## 4.0 Proposal

The proposal (see Figure 10) is substantially similar to the Desired Future Layout depicted in Figure 5. It is based on the refining that layout based on the key concepts listed in Section 1.0 of this report.

The plan adopts the following principles:

### 4.1 Transit-Oriented Development

As the subject site is located adjacent to the future Cudgegong Railway Station, an opportunity exists to implement principles of transit-oriented development.

Therefore, residential densities must be maximised within the Cudgegong Local Centre in order to:

- Improve access to housing, jobs and services;
- Increase the choice of available transport;
- Reduce travel demand and VKT; and
- Maximise patronage of the future Cudgegong Railway Station and North West Rail Link.

This can be achieved through an increase in maximum height and FSR as follows:

- Maximum height of buildings:
  - Lot 72 in DP 208203: 26m and 35m
  - Lot 73 in DP 208203: 35m and 50m
- FSR: 3.5:1 across the site.

Further detail in relation maximum height is provided in Section 4.5 of this report. Justification for the increase is provided in Section 5.0 of this submission.

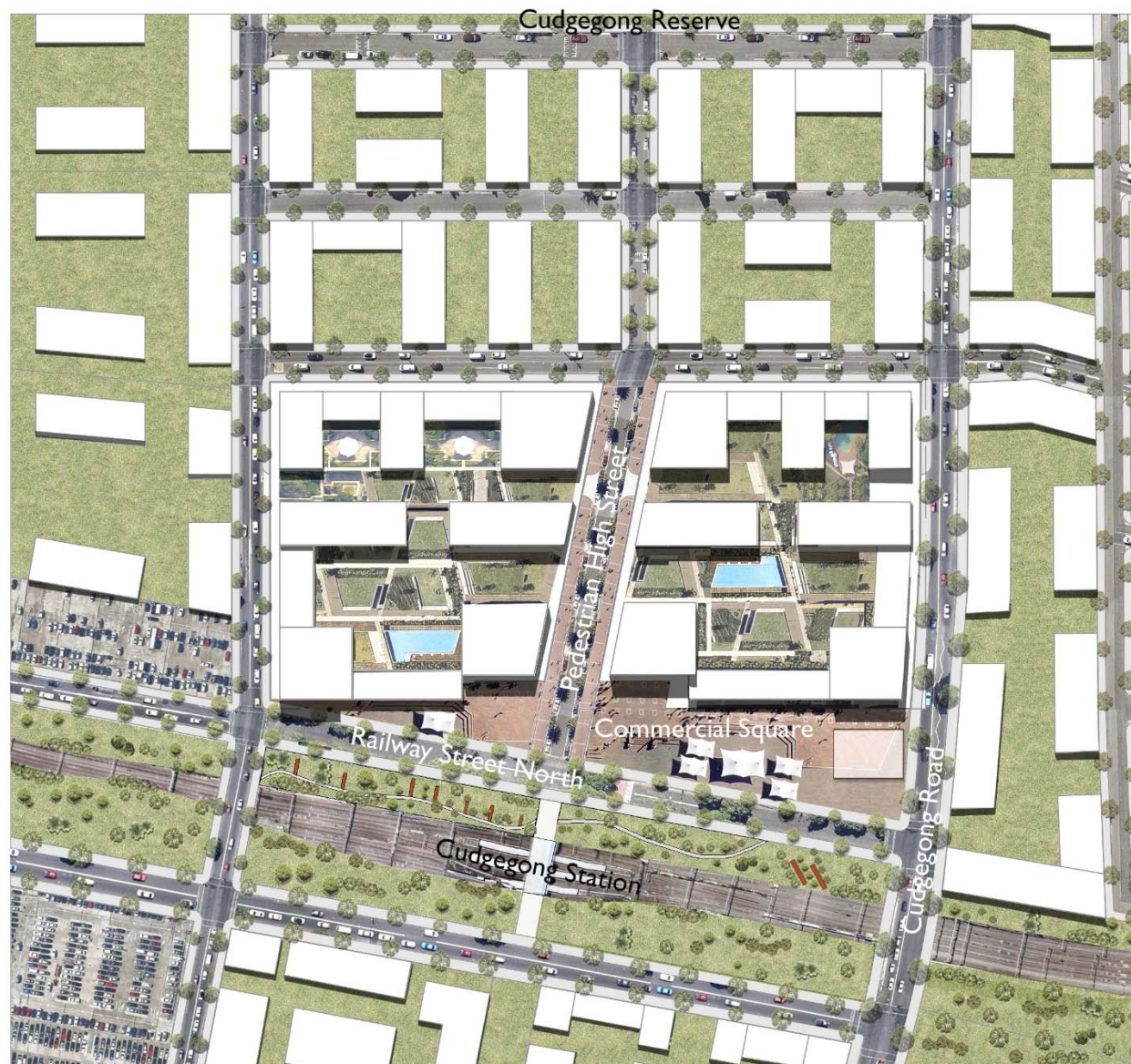


Figure 10: Proposed master plan (Replacement Desired Future Layout)

## 4.2 Vital and Vibrant Town Centre

The increased maximum height and FSR sought as part of this submission will enable the development of a centre incorporating the following ten principles:

- 1) *Multi-functional: residential, offices, retail, recreation, entertainment, civic, institutional and cultural facilities.*
- 2) *Community: serving and meeting its demands and acting as a community focal point.*
- 3) *Extended activity periods: operation outside of normal business hours.*
- 4) *Environment and ambience: experiences generated by the physical environment, commercial and community facilities and social interaction.*
- 5) *Scale: walkable distances, appropriate adjacent building heights and open space that does not detract from continuity of active street frontage.*
- 6) *Accessibility: ease of public transport and private vehicle access and pedestrian permeability.*
- 7) *Integration with surrounding uses: catering to and benefiting from surrounding residents, workers and visitors.*
- 8) *Retail: abundant, varying, vibrant, dynamic, adaptable and operating every day and for extended hours, generating essential pedestrian activity.*

9) *Local markets: substantial local captive population to support day-to-day viability and vitality of the town centre.*

10) *Sense of place: above factors, in addition to local character derived from geography, climate and characteristics of the local demographic.*

Compliance with each principle is tabled in Section 5.2 of this report.



## 4.3 Urban Structure

The amalgamation of Lots 72 and 73 in DP 208203 enables the development of podium and tower development on both the eastern and western sides of a proposed Pedestrian High Street as seen in Figure 11:

- Cudgegong Local Main Road is transformed into a pedestrian priority High Street to create a safe and inviting environment for foot traffic.
- Cudgegong Road provides the primary form of access to the town centre by private vehicle.
- Local Roads, including Railway Street North, provide access to the future Cudgegong Road Station and circulation around the town centre.
- Pedestrian movements are anticipated between the future Cudgegong Road Station and Cudgegong Reserve, via retail with active street frontage to the Pedestrian High Street, as well as the Village Squares.
- Secondary pedestrian movements occur through a permeable retail podium with multiple entry points, allowing pedestrians to choose a path of least resistance when travelling between Pedestrian High Street and desired destination.
- The provision of village squares adjacent to the station will provide a plaza for commuters and visitors to the centre.

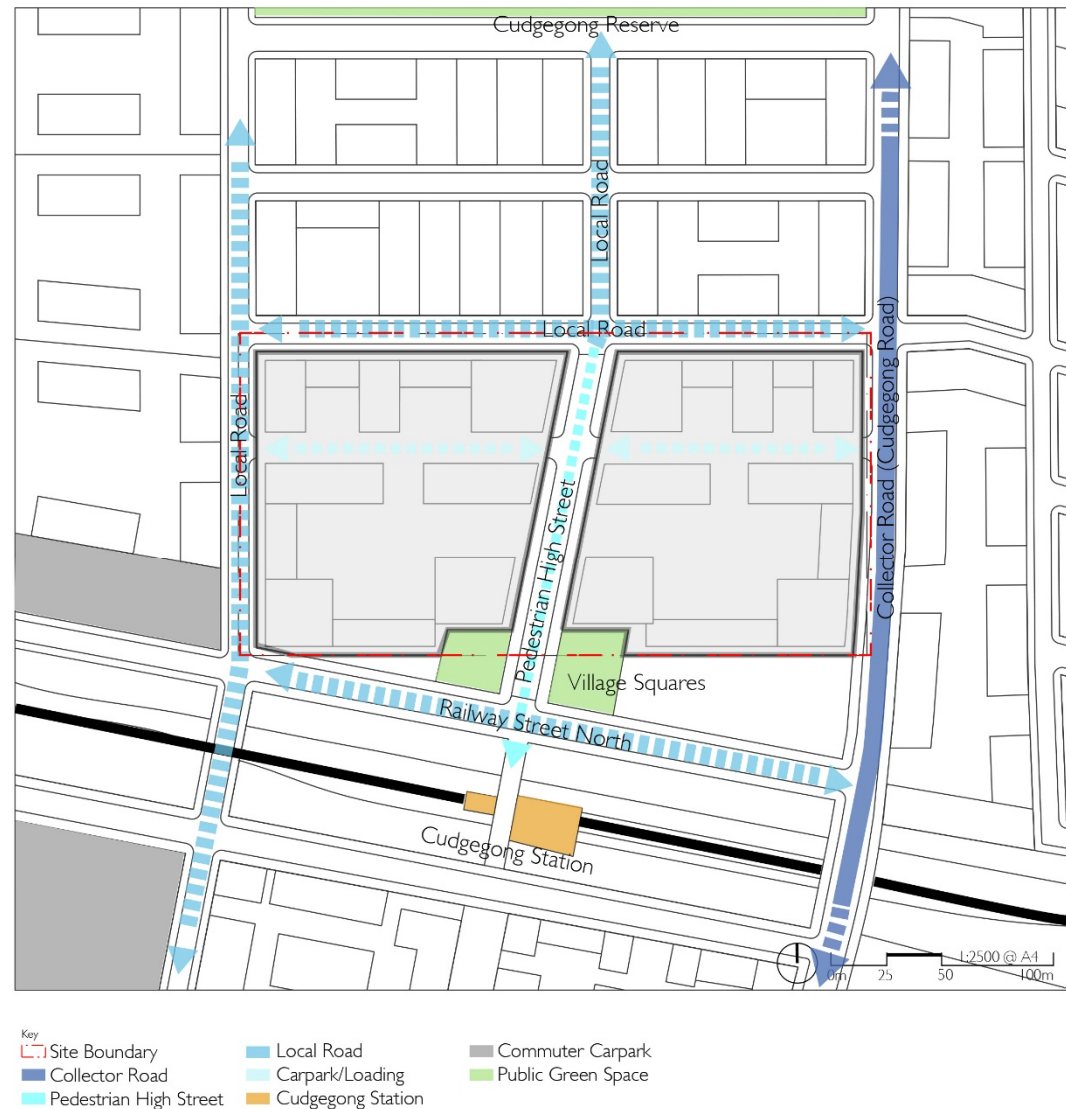


Figure 11: Urban structure

## 4.4 Land Uses

The anticipated land uses focus activity around the future station and village squares as shown in Figure 12.

- A reduced length of active street frontage to Pedestrian High Street, supporting the desire for *"fine grained and intensive retail uses that present an active street frontage ... along the Main Street"* (Cl. 4.1.1)
- Responds to the land use zoning by providing:
  - Retail and commercial floor space consistent with Cl. 4.1.1:
    - Predominantly located towards the southern portion of the site, proximate to the future Cudgegong Road Station.
    - Support a multi-functional centre with a variety of community uses and facilities (e.g. medical, fitness, health and childcare centres).
  - High density residential in the form of shop-top housing within southern portion of the site, consistent with Cl. 4.1.1: *"Mixed use developments containing residential uses on upper floors are located in the Centre to take advantage of access to transport and services, and to increase levels of activity within the Centre"*.
  - Residential flat buildings within the northern portion of the site, which provide a residential frame for the centre.

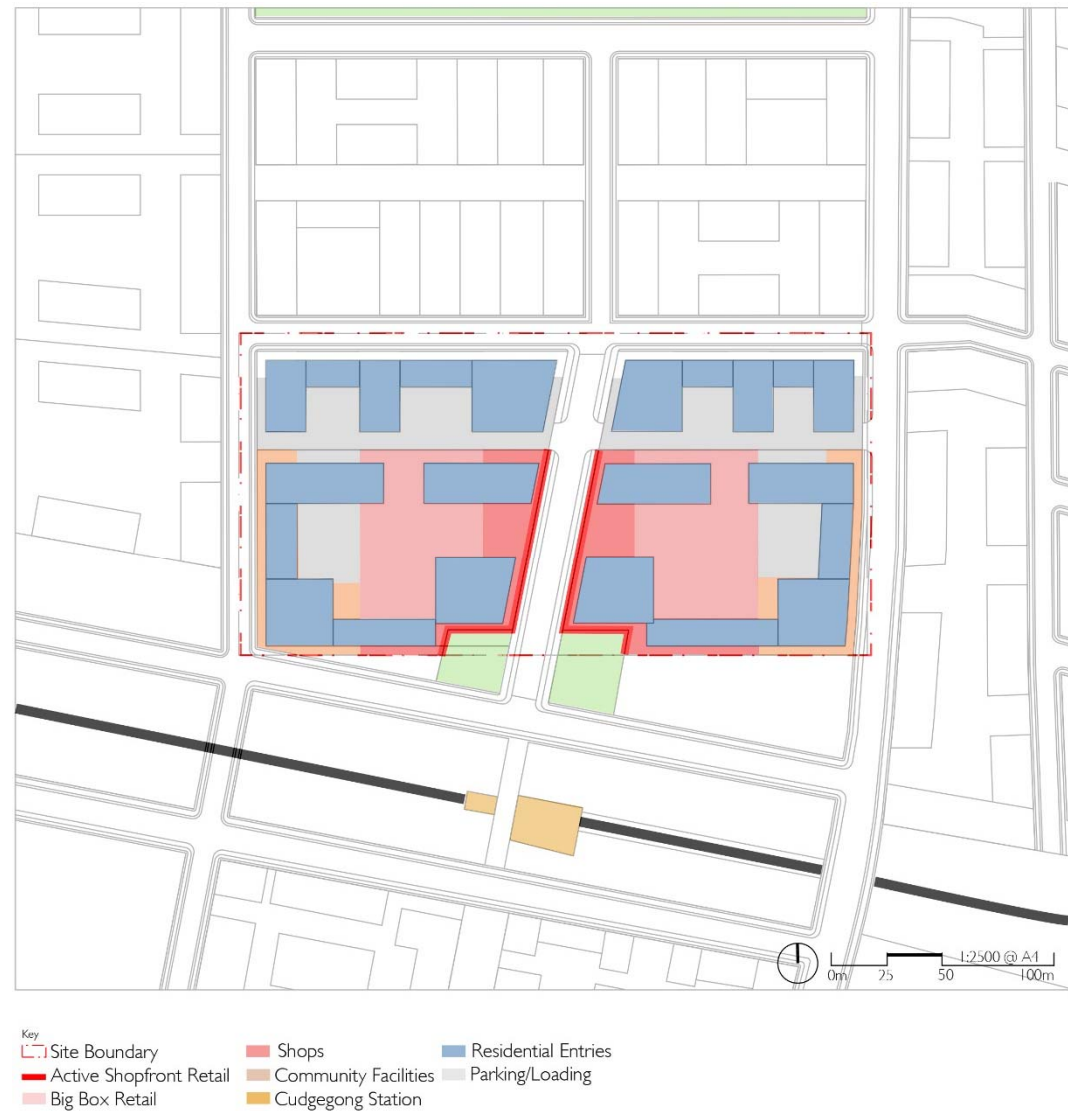


Figure 12: Land use

## 4.5 Built Form

We request that maximum building heights be amended as per Figure 13:

- **Lot 72** in DP 208203: **26m and 35m**
- **Lot 73** in DP 208203: **35m and 50m**

Maximum building heights reduce sequentially across the site, with greatest maximum height at the southern portion of the site (closest to Cudgegong Road Station). This strategy adopts the following principles:

- Transition to residential uses to the north, east and west whilst creating an identifiable town centre within the Area 20 Precinct; and
- Respond to the topography allowing the tallest building to be in the core of the centre.

Figure 14 shows that building separation compliant with the RFDC is achieved under the proposed layout. Additional building heights will allow variation in building height to provide built form interest and design quality as indicated in Figure 15.

Additional density is required in the centre to:

- Improve access to housing, jobs and services;
- Increase the choice of available transport;
- Reduce travel demand and VKT; and
- Maximise patronage of the future Cudgegong Railway Station and North West Rail Link.

Further justification for the increase is provided in Section 5.0 of this submission.



Figure 13: Height of buildings



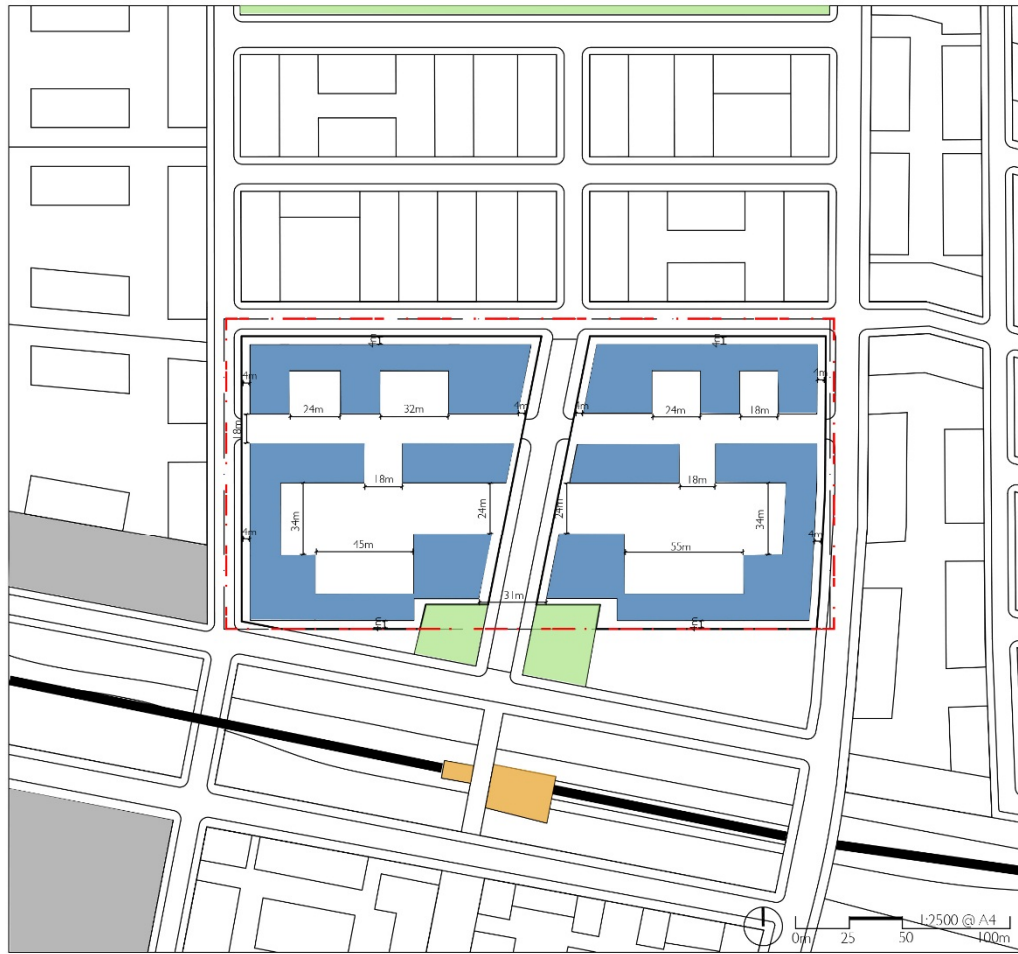


Figure 14: Building separation



Figure 15: Artist's perspective of potential town

## 4.6 Open Space

Open space takes the form of station plaza, village squares, Cudgegong Reserve and streets as shown in Figure 16.

- The Village Squares desired by the DCP 2010 are retained within the subject site. This creates an opportunity to further expand the squares throughout Lot 71 in DP 208203, permitting additional retail specialty stores (as depicted in Figures 17 and 18).
- The combination of the landscaped Northwest Rail Link Corridor and Village Squares creating a high amenity passageway along Railway Street North.
- Residents within the town centre will benefit from residential open space above the podium level forming communal open space (see Figure 16).
- A landscaped treatment is provided to the Pedestrian High Street, creating an environment conducive to foot traffic (see Figure 19).
- A vision for the retail high street and commercial squares are provided in Figure 17 and 18.

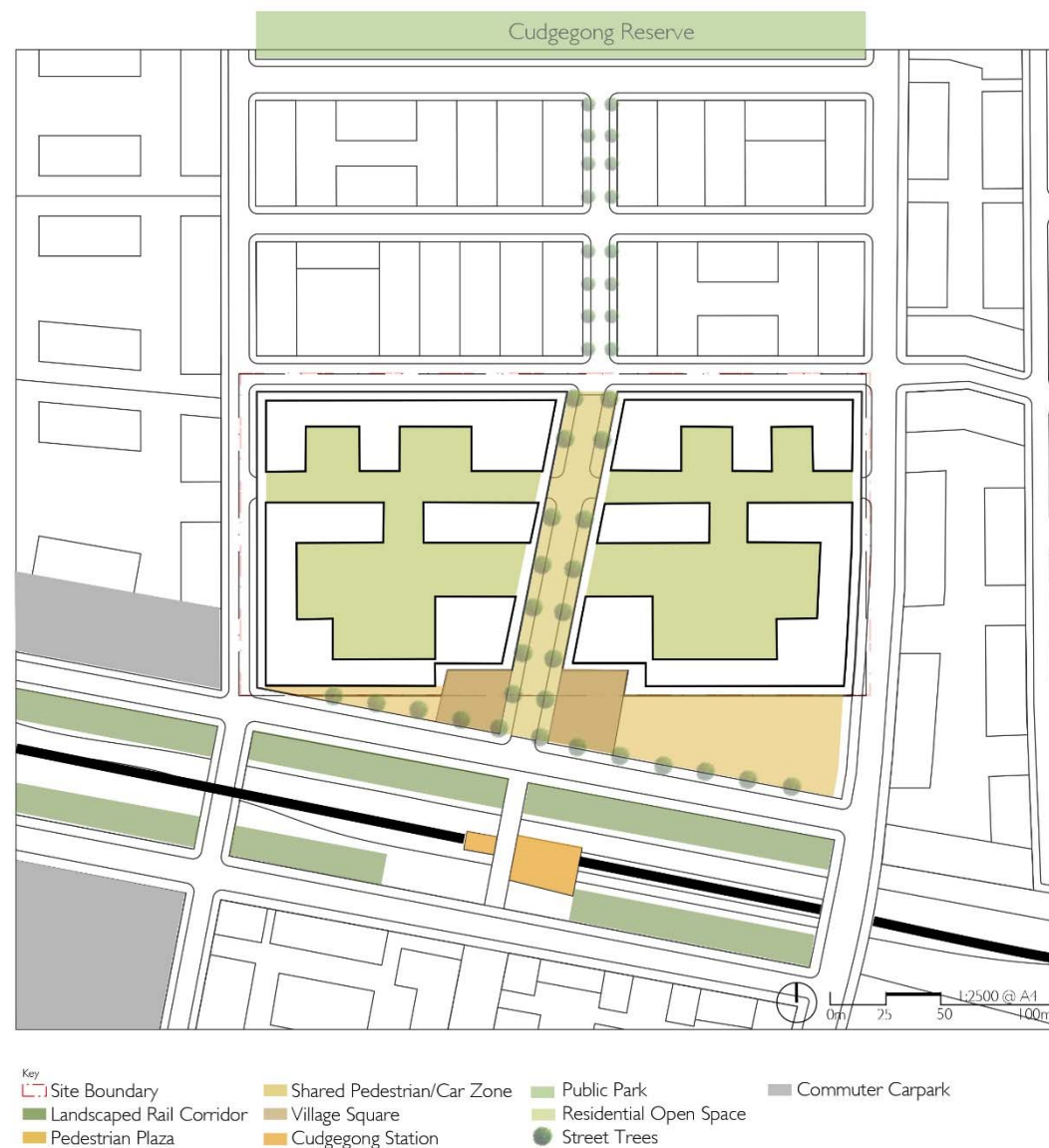


Figure 16: Open space network





Figure 18: Retail High Street example – Station Square / Burnaby, BC, Canada  
(Hillsdon 2013, Development boom transforming Metrotown landscape, image, Metro604)



Figure 178: Commercial square vision



## 5.0 Justification

### 5.1 Transit-Oriented Development

The dwelling yields calculated during built form testing (see Table 2) are not sufficient to effectively implement principles of transit-oriented development. A dwelling yield within the range of 1300 – 1500 dwellings:

- Responds to the opportunity afforded by the convergence of a variety of transportation methods within the Cudgegong Local Centre.
- Reinforces activity along pedestrian movements as illustrated in Figure 19, ensuring a vital and vibrant town centre both during the day and at night.

This outcome is best achieved through an increase in maximum height and FSR, as proposed as part of this submission. This is supported by the Governor-General's Section 117 Direction 3.4 Integrating Land Use and Transport. The objective of the s117 direction is to ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives:

- Improving access to housing, jobs and services by walking, cycling and public transport, and*
- Increasing the choice of available transport and reducing dependence on cars, and*
- Reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and*
- Supporting the efficient and viable operation of public transport services, and*
- Providing for the efficient movement of freight.*

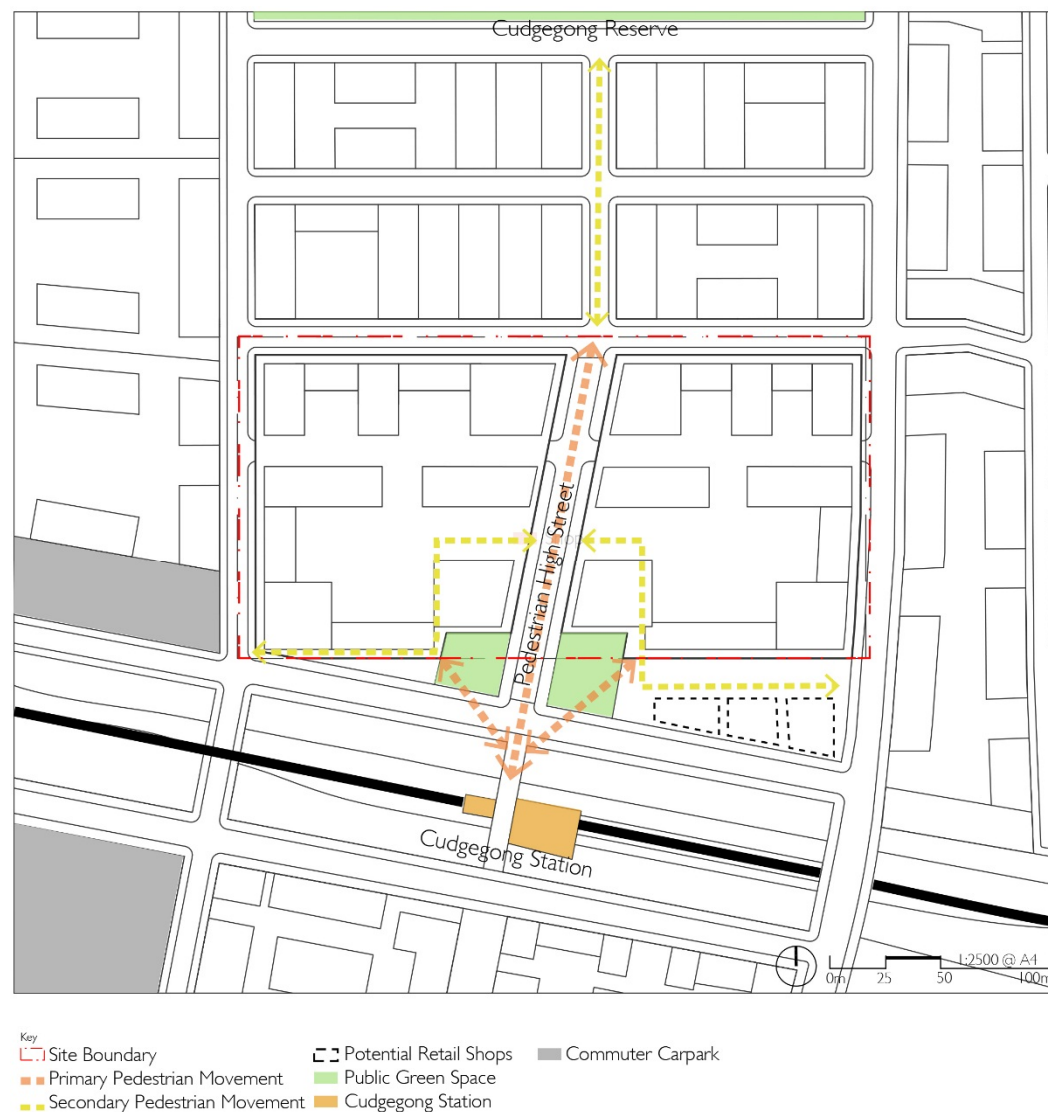


Figure 19: Pedestrian and open space network north of station

## 5.2 Vital and Vibrant Town Centre

An increase in maximum height and FSR enables the development of a successful town centre. Table 3 provides an assessment of the ten principles set out in Section 4.2 of this submission, as well as comments as to how the revised scheme contributes to their achievement in the Cudgegong Local Centre.

Additionally the proposal focuses the movement and activity of pedestrians in the core of the centre adjacent to the Cudgegong Road station as shown in Figure 20.



Figure 20: Example vibrant town space

Table 3

NUMBER:	CHARACTERISTIC:	COMMENT:
1	Multiple functions	<p>Supported by the critical mass of population enabled by the proposed increase in maximum height and FSR, a mixture of uses are facilitated within the Cudgegong Local Centre:</p> <ul style="list-style-type: none"> <li>• Residential: <ul style="list-style-type: none"> <li>○ With dwelling yield that achieves the site's full potential for transit-oriented development, and</li> <li>○ With dwelling yield that creates a sufficient local captive population to generate regular visits, in addition to contributing to the vitality of the precinct.</li> </ul> </li> <li>• Office: <ul style="list-style-type: none"> <li>○ Creating local employment opportunities, and</li> <li>○ Contributing to local captive population to generate regular visits, in addition to contributing to the vitality of the precinct.</li> </ul> </li> <li>• Retail: <ul style="list-style-type: none"> <li>○ With GLA consistent with Cl. 4.1.1 of the DCP 2010 (exhibited draft Schedule 4 – Area 20), p 28,</li> <li>○ Creating local employment opportunities, and</li> <li>○ Generating vital local pedestrian and retail activity.</li> </ul> </li> </ul> <p>With time, additional functions, including recreation, entertainment, civic, institutional, and cultural facilities will develop as the local centre becomes established.</p>
2	Community orientation and ownership	Community orientation and ownership is achieved through a town centre assuming the role of a community focal point. The revised scheme achieves this through a commercial GLA to permit
3	Extended activity periods	A critical mass of population enabled by the proposed increase in maximum height and FSR facilitates activity beyond normal business hours.
4	Environment and ambience	A critical mass of population enabled by the proposed increase in maximum height and FSR facilitates a vital and vibrant town centre generating opportunities for social interaction and shared experiences.
5	Scale	The proposed increase in maximum height and FSR will result in a scale representative of a town centre, setting it apart from lower intensity uses within the locality.
6	Accessibility and exposure	Regional and local access is critical to the success of the local centre. This is to be provided in the form of Cudgegong Railway Station on its opening in 2019, as well as roads within the site (as required by the Figures 3 and 4).



7	Integration with surrounding land uses	The proposed increase in maximum height and FSR facilitates the development of a vital and vibrant local centre, providing for the retail, employment, services and transport needs of residents of surrounding areas.
8	Retailing	<p>The total retail GLA (12,739m<sup>2</sup> enabled by this scheme):</p> <ul style="list-style-type: none"> <li>• Is supported by a critical mass of population enabled by the proposed increase in maximum height and FSR,</li> <li>• Exceeds Leyshon Consulting's recommended 9,500m<sup>2</sup> (Department of Planning &amp; Infrastructure 2011, Post Exhibition Planning Report, Appendix C – Retail Planning Advice for Area 20, p ii), and</li> <li>• Is consistent with Cl. 4.1.1 of the exhibited draft Schedule 4 – Area 20 (DCP 2010, p 28) in terms of: <ul style="list-style-type: none"> <li>○ Point (1) of Cl. 4.1.1 requiring between 12,500m<sup>2</sup> and 15,000m<sup>2</sup> of retail/commercial floor area,</li> <li>○ Point (2) of Cl. 4.1.1 requiring sufficient floor space to facilitate a variety of uses (e.g. medical, fitness, health and day-care centres) to support a multi-functional centre,</li> <li>○ Point (4) of Cl. 4.1.1, requiring maximisation of employment opportunities within the town centre,</li> <li>○ Points (5), (6), (7) and (8) requiring co-located, fine grained and intensive retail and commercial uses that front the Main Street and integrate with public open spaces (Town Squares).</li> </ul> </li> </ul>
9	Local markets	<p>The most important single factor underpinning the success of a town centre is the presence of a substantial local captive population.</p> <ul style="list-style-type: none"> <li>• The proposed increase in maximum height and FSR supports a critical mass of population to generate regular visits, in addition to contributing to the vitality of the precinct.</li> <li>• The increased retail GLA facilitates a larger worker base within the town centre to support its day-to-day function.</li> </ul>
10	A sense of place	Successful places bring together most or all of the features described above, and infuse the distinct local character brought by geography, climate and the characteristics of the local market. Through a critical mass of population enabled by an increased maximum height and FSR, Cudgegong Town Centre is capable of becoming a vital and vibrant town centre by facilitating the day and night interaction of a variety of people for a variety of reasons.

## 6.0 Conclusions and Recommendations

In response to the exhibited draft controls, we have conducted an investigation of permissible building envelopes and made the following findings:

- There is a mismatch between maximum height and FSR;
- The Desired Future Layout assumes ownership and development of Lots 71, 72 and 73 in DP 208203; and
- The Desired Future Layout is not consistent with building separation provisions within Residential Flat Design Code and setback requirements of the Blacktown City Council Growth Centre Precincts DCP 2010.
- The Desired Future Layout road pattern has excessive roads and lanes.

This submission makes recommendations for amendments to exhibited draft planning controls within Lots 72 and 73 in DP 208203 in the Area 20 Precinct of SEPP (SRGC) 2006, as listed below:

- Exhibited draft SEPP (SRGC) 2006 maps:
  - Maximum height:
    - **Lot 72** in DP 208203: **26m and 35m**
    - **Lot 73** in DP 208203: **35m and 50m**
  - FSR:
    - **Lot 72** in DP 208203: **3.5:1**
    - **Lot 73** in DP 208203: **3.5:1**
- Exhibited draft DCP (particular reference to Schedule 4 – Area 20 Precinct) adoption of the proposal included in Section 4.0 of this report which includes:
  - Altered road network;
  - Main Street section; and
  - Building layout.

The proposal as outlined in this document is consistent with the requested height and FSR provisions. It is substantially the same as the plan desired by the DCP 2010. However it refines the layout based on the following key concepts:

- Amalgamation of Lots 72 and 73 in DP 208203, excluding Lot 71 allowing development to occur in a stages sustainable manor.
- Residential Flat Design Code (SEPP 65) compliancy.
- DCP 2010 compliant street, side, rear and upper level building setbacks.
- Retail GLA consistent with the DCP and supporting the development of a multi-functional centre.
- Reduced active street frontage to reflect the town centre's scale and a compact vibrant centre.
- Increased residential density in order to implement principles of transit-oriented development and a vital and vibrant town centre.