

9 January 2015

Paul Robilliard
Director Greenfield Delivery
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Sir,

Proposed changes to planning controls in the Area 20 Precinct


Thank you for the opportunity to comment on the draft changes to the planning controls to the Area 20 Precinct in the North West Growth Centre.

Our submission to the proposed amendments is included at Attachment 1 to this letter. The submission covers matters relating to the acquisition of the Second Ponds Creek trunk drainage corridor, various drainage matters, traffic, open space, community facilities, local road widths in high density areas and general mapping issues.

We welcome the opportunity to further work with you to discuss and resolve these issues.

If you would like to discuss this matter further, please contact Council's Strategic Planner, Zara Tai on 9839 6237.

Yours faithfully,



Glennys James
Assistant General Manager

**Blacktown City Submission to
Proposed Changes to Planning Controls in the Area 20 Precinct**

1. Acquisition authority for the Second Ponds Creek trunk drainage land

- a. The proposed changes to the Area 20 Precinct Plan nominate Council as the relevant acquisition authority for the Second Ponds Creek trunk drainage corridor. This corridor is 16.3 ha in size. The acquisition of this land is estimated at \$10 million, based on a rate of \$60 per square metre. This cost will need to be included into Section 94 Contributions Plan No. 22 – Area 20 Precinct.
- b. Sydney Water had a Development Servicing Plan that collected funds for the acquisition of the Second Ponds Creek trunk drainage land. Any funds that have been collected by Sydney Water should be transferred to Council to supplement our new acquisition responsibility in the contributions plan.
- c. We oppose the nomination of Council as the acquisition authority until such time as the State Government can provide us with certainty that the necessary funds to acquire and embellish the drainage corridor can be assured. These funds should come from either Sydney Water and/or under the LIGS Funding Scheme for Section 94 costs over the \$30,000 cap.

2. Traffic

- a. The approved ILP (October 2011) has 5 entry/exit points for the area bounded by the North West Rail Link (NWRL), Terry Road, Schofields Road and Windsor Road. This includes 2 along the eastern side of the Precinct where the NWRL was underground, 2 above the NWRL just east of Terry Road and one short local road off Terry Road and south of the NWRL.
- b. Under the proposed amendments to the ILP, this area has only 2 exit points, one under the NWRL at the eastern part of the Precinct and one in a short local road on the eastern side of Terry Road, south of the NWRL.
- c. We are concerned that there will be a lack of entry/exit points servicing this area. The area is planned for medium to high density ranging from 25 dwellings per hectare to 45 dwellings per hectare. The 2 entry/exit roads are unlikely to cope with the amount of traffic in this area and there will be significant delays in exiting and entering during peak times. This area should be modelled to ascertain the traffic flows, the number of required exit/entry points and the types of traffic controls required.
- d. Further, due to the increase in the estimated number of dwellings (from 2,500 to 4,400), there is a need to generally check traffic volumes throughout the Precinct. We believe that the entire Precinct should be traffic modelled to ascertain the impact of the proposed changes to planning controls and to determine if more roads and intersection treatments are required.
- e. More specifically, the additional road crossing over the NWRL between Tallawong Road and Cudgegong Road needs to be justified to support the additional Section 94 costs, as there is a crossing at Cudgegong Road less than 300m away.

3. Stormwater drainage

- a. Included as an appendix to this submission is a plan showing a range of changes that we request be made to address drainage matters. These matters have previously been raised by Council, yet have not been incorporated as part of the proposed ILP amendments.
- b. The proposed changes to drainage shown in the draft ILP are not supported with updated stormwater concept designs, reports or modelling. It is not possible to verify whether the proposed land allocation for drainage is adequate where changes are proposed from the previous ILP layout. The supporting documentation is required to support justification to IPART for the costing of these items in our Section 94 Contributions Plan No. 22 – Area 20 Precinct.
- c. If the current grading of Cudgegong Road is maintained, then drainage could be directed along Cudgegong Road to Schofields Road and then to Second Ponds Creek. The changes to the NWRL alignment have an impact on how the area drains, particularly when road patterns and grades change. The previous drainage arrangements are no longer valid or cost effective, particularly if it means acquiring more land than is necessary. This is why there needs to be a review of how the drainage is configured.
- d. The section of drainage south of the NWRL and east of the Terry Road extension should be deleted as it is not required. This land should be zoned R3 Medium Density Residential.
- e. The section of drainage on the south side of Rouse Road from Cudgegong Road to the open space zoned land should be deleted, as an alternate trunk drainage solution along Rouse Road is more practical. The ILP road layout should be amended to enable residential development.

4. Open space

- a. The proposed changes to the Area 20 Precinct Plan will result in an increase in population. This will result in a commensurate increase in the amount of open space and recreation facilities required. We understand that the shortfall in the quantum of open space and recreational facilities will be provided in the Riverstone East Precinct and not in the Rouse Hill Regional Park.
- b. The Riverstone East Precinct Plan needs to provide the required amount of useable open space in an equitable framework that considers the distribution of open space in response to the shortfall in the Area 20 ILP.
- c. The section of open space located between the electrical substation, NWRL and the Second Ponds Creek drainage corridor has little recreational benefit. This area is landlocked, unless there is enough clearance under the western side of the bridge at Second Ponds Creek for a road so that it can be accessed. There should be greater passive surveillance to ensure that this area is utilised by the public, otherwise the open space has little public benefit. Due to the access limitations, this area of open space should not be counted towards the required quantum of open space provision.

5. Community facilities

- a. In February 2014, 2 options for a community service facility for Area 20 were presented as part of the draft local centre investigations. The proposed facility was planned to provide for the needs of the population in both Area 20 and the Riverstone East Precinct.
- b. The proposed facility in the Area 20 Precinct would be apportioned, in terms of cost, across Riverstone East and the Area 20 Precinct. The planning for the Riverstone East Precinct has been based on the premise that there would be a community facility in the Area 20 Precinct.
- c. The amount of land required for the community facility is 4,500sqm. This will allow for a 750-1,000sqm hub. It should be identified on the land acquisition map, the ILP and within the desired future layout plan in the DCP. The preferred location for the community facility has been marked on the second appended plan.

6. Commercial Centre at the Proposed Railway Station

- a. Blacktown City is concerned about the potential size of the centre given the increase in amount of land zoned for business purposes. The Planning Report indicates the proposed business zones have an area of 4.1 ha (1.9 zoned B2 and 2.2 zoned B4). The draft zoning plan indicates an increase to 12.46 ha (3.10 zoned B2 and 9.36 zoned B4). This is a 300% increase on what was previously gazetted.
- b. It is appreciated that not all land zoned for business purposes will be developed to full capacity due to the potential for other uses to develop. This needs to be re-examined in the context of the retail hierarchy within Blacktown City.
- c. Similar to the Alex Avenue Precinct, there does not appear to be any mechanism in place to ensure the "village squares" can be achieved.

7. Land zoning map

- a. Schofields Road alignment
 - i. The zoning map shows most of the Schofields Road widening. The section of Schofields Road adjacent to the Area 20 Precinct has been constructed. The land use for the constructed and widened Schofields Road needs to be changed to SP2 Infrastructure (Classified Road) for its full extent. This issue has been previously raised by Council.
 - ii. The proposed bio-retention system at the corner of Cudgegong Road and Schofields Road is shown to be mostly located within the current Schofields Road reserve. This would not enable the bio-retention system to be constructed. This needs to be rectified.
 - iii. The ILP also needs to be updated to reflect the completed RMS works along Schofields Road to give certainty to current and future land owners as to the development potential of their land.
- b. Cudgegong Road alignment
 - i. The location of Cudgegong Road also needs to align properly with the intersection constructed by RMS. This also applies to the Tallawong Road deviation by RMS. Part of the proposed deviation of Cudgegong Road is shown as B2 Local Centre. This needs to be correctly reflected on the ILP and zoning map.
 - ii. Clarification of the proposed height above the exiting level to clear the NWRL is required at the Cudgegong Road overbridge. Concern is raised with the practicalities of having roads parallel to the NWRL connecting to Cudgegong Road, as it may require several metres of fill and retaining walls. Clarification is also required as to how much of the Cudgegong Road overpass will be funded and built as part of the NWRL and how much is to be apportioned to Section 94.

8. Native Vegetation Protection Map

- a. When the Native Vegetation Protection Maps are updated, a minimum 5 m clearance is required on either side of Rouse Road crossing Second Ponds Creek for construction purposes.

9. Other ILP matters

- a. Land west of the electrical substation
 - i. Clarification is sought on the proposed use of the redundant section of land west of Cudgegong Road near Schofields Road. Any decision on the land use and road configuration must maintain access to the zone substation.

b. Proposed school site on Terry Road

- i. The ILP shows a proposed school on Terry Road, Rouse Hill. On 15 December 2014, a Development Application was approved for a residential flat building on Lot 209 DP 208203, 9 Terry Road, Rouse Hill. This site occupies part of the land identified as the proposed school. This site was not exclusively zoned for the use as a school nor included on the SEPP acquisition maps on advice from the Department of Education and Communities (DEC). The DEC has confirmed that it does not require the site until at least another 5 to 10 years. It is understood that the preliminary planning of the Riverstone East Precinct may include a school which would cater for the demand generated in both the Area 20 Precinct and Riverstone East Precinct.
- ii. The annotation of the proposed school site should be removed and changed to "Medium to High Density Residential Development", consistent with adjoining land. The proposed road on Lots 100, 101 and 102 DP 1049793 should also be changed to make better use of land for medium and high density residential development adjacent to land at 9 Terry Road.

10. DCP road widths in medium and high density areas

- a. The current DCP contains controls for the width of local roads. These road widths are not delineated by density, so the local road width is the same for both low density and higher density areas. We request a change to the DCP road widths for areas that will be developed for medium density (R3 zones) to cater for increased traffic movements and on-street parking generated from medium density urban environments.
- b. The width of these roads does not allow for parked cars on either side of the road and 2 travel lanes (one car passing in either direction). This does not present a problem in low density areas, where sufficient off-street parking is provided in driveways and garages and traffic volumes are lower. However, in medium and high density areas this is a problem as there will be significantly more cars using the road and less off-street parking spaces available which will force more on-street parking.
- c. The local road width controls currently require a 9m wide carriageway in a 16m wide road reservation. We request an 11m wide carriageway in an 18m wide road reservation. This will be a new road category called "High Density Local Roads". The dimensions of the carriageway should be the same as "Collector (1) Road" in Table 3.1 Road Hierarchy and Widths in Blacktown City Council Engineering Guide for Development 2005. This would allow for parked vehicles on either side of the road and 2 through lanes.
- d. The local road widths in the B2 Local Centre and B4 Mixed Use zones (located around the proposed railway station) are inadequate for the same reason. These roads should have the same width as documented in Section 3.2.4 Built Form in the Alex Avenue Schedule of the Blacktown City Council Growth Centres DCP 2010. Control 5 states that main and secondary streets are to be 20 - 25 m wide.
- f. We propose to prepare a draft DCP amendment to include this additional road width control to apply to all medium – high density areas and around town centres in the North West Growth Centre precincts in Blacktown City. In the immediate term, we request that these new controls be incorporated into the DCP Schedule applying to Area 20 as we have had several discussions with developers interested in developing residential flat buildings in that precinct.



11. DCP figures that need updating

- a. Figure 1.1 Land Application Map needs to be updated. It is identical to what was adopted in October 2011.
- b. Figure 3.1 Precinct Road Hierarchy, Figure 3.2 Public Transport Networks and Figure 3.3 Pedestrian and Cycle Networks need to be updated. They are identical to the DCP Schedule that was adopted in October 2011. A "high density local road" typical section should be provided in this section as discussed above.

- c. The Public Domain Strategy needs to be updated. It is identical to the DCP Schedule that was adopted in October 2011. Some additions to the controls in Section 3.2.2 Public Domain and Landscape Character Windsor Road Interface in the south-east corner are required. The change to the ILP in this section makes the controls provided for the Windsor Road Interface obsolete. Figure 3.9 Section A – Indicative Windsor Road Interface does not correlate with the amended road layout in the south-east corner of the Precinct.
- d. In Figure 4.6 the 2m central landscaped strip should be deleted. The footway should be widened from 3m to 4.5m wide. This would result in a 23m road reserve width. There is a typing error in the overall width.

Area 20 Precinct

Draft Indicative Layout Plan

-  Precinct Boundary
-  Land to which Precinct Plan Applies
-  Local Centre
-  Mixed Use
-  Preferred Location for Neighbourhood Services
-  Medium to High Density Residential
-  Medium Density Residential
-  Low Density Residential
-  Very Low Density Residential
-  School
-  Parks
-  Village Square
-  Sporting Fields
-  Conservation Area
-  Drainage
-  Utilities
-  Bio-Retention Raingarden
-  Riparian Corridor
-  North West Rail Link Corridor
-  Indicative Location of Commuter Parking
-  Major Road
-  Local Road
-  Existing Transmission Easement
-  Creek Line
-  Potential Pedestrian and Cycle Link
-  1 in 100 year Floodline (Post Development)
-  Non-Certified Vegetation

Scale
0 100 200 500m
1:5,000 @ A1
1:10,000 @ A3
10 October 2014



Planning & Environment

BOX HILL INDUSTRIAL

WINDSOR ROAD
ANMAN GROVE ROAD

ROUSE HILL HOUSE & ESTATE

CURRENT PLANNING CONTROLS UNCHANGED

ROUSE HILL REGIONAL PARK

RIVERSTONE EAST

This section of drainage can be deleted

What are level differences and can these road connections to overpass be achieved?

Need details of amended and extra drainage elements

Delete this section of drainage

Extra road crossing over railway will add cost to S94 and hard to justify on demand

Adjust ILP & zoning maps to suit RMS works and boundaries

What is intended use of redundant section of Cudgong Road? Parking, drainage, other?

THE PONDS

ALEX AVENUE

SCHOMEDON ROAD

ROUSE HILL

COMMERCIAL RD

WINDSOR ROAD

ROUSE HILL

ROUSE HILL

ROUSE HILL

ROUSE HILL

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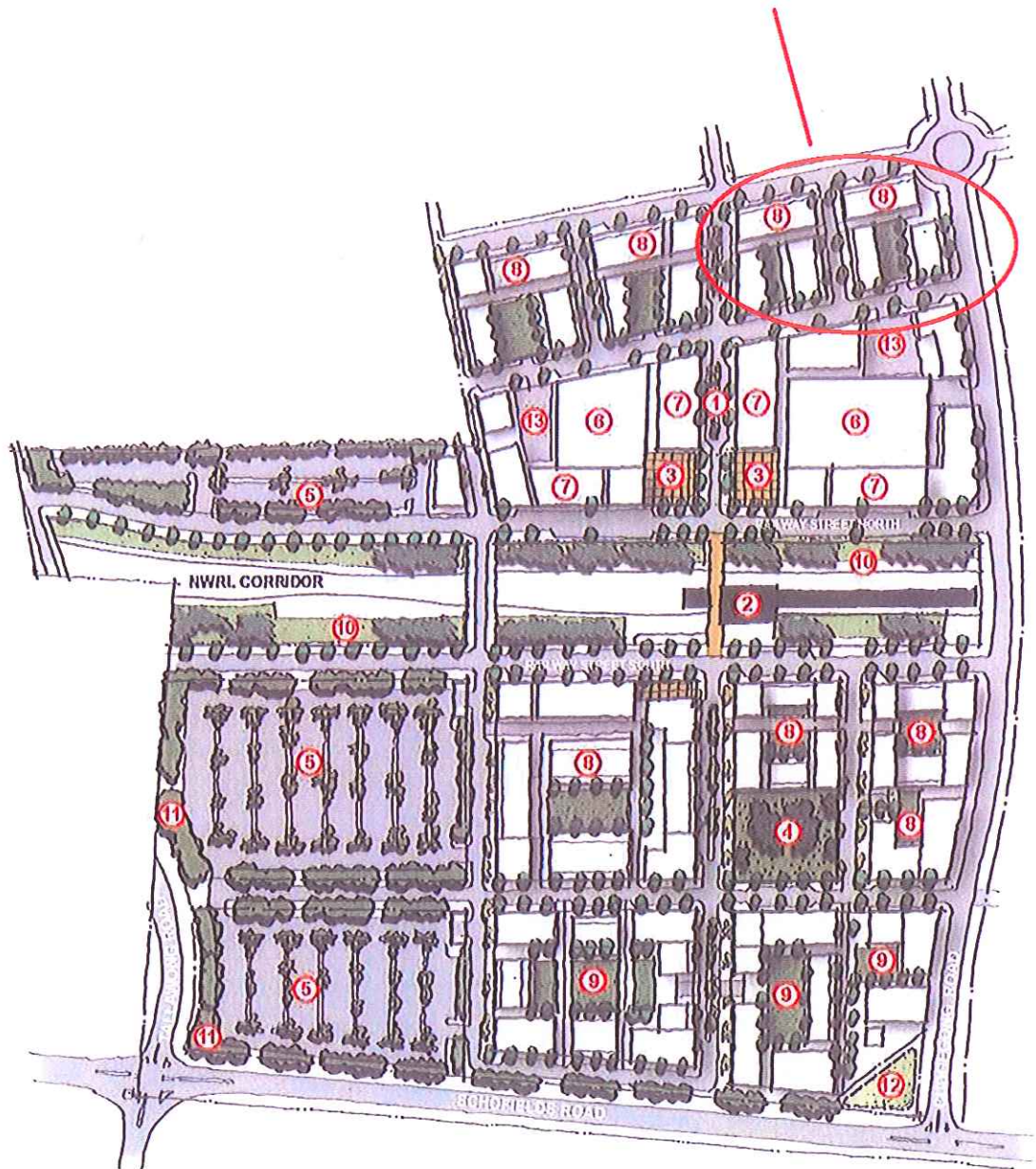
ROUSE HILL

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ROUSE HILL

Preferred location of community facilities 4500 m2 in site area



Desired Future Layout

- | | | |
|---------------------------------|--------------------------------------|-------------------------|
| ① Main Street | ⑦ Retail (Shops) | ⑫ Drainage (Raingarden) |
| ② Cuddegong Railway Station | ⑧ Mixed Use Buildings | ⑬ Service Areas |
| ③ Village Square | ⑨ Medium to High Density Residential | |
| ④ Village Park | ⑩ Landscaped NWRL Corridor | |
| ⑤ Preferred Commuter Carparking | ⑪ Landscape Buffer | |
| ⑥ Retail (Supermarkets) | | |

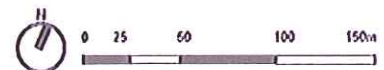


Figure 4-2 Desired Future Layout for Cuddegong Local Centre