

18 September 2015

The Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Madam/Sir,

## RE: Submission to the Riverstone East Draft Indicative Layout Plan

### 1 Introduction

We are making this submission on behalf of several land owners within the Riverstone East Precinct (the Precinct) and would like to thank the Department of Planning and Environment (the Department) for the opportunity to comment on the draft Indicative Layout Plan (ILP) for Riverstone East. We congratulate the Department on its extensive work to date and look forward to seeing the further development of precinct planning process informed by the feedback received during this current public exhibition period.

The purpose of this submission is to demonstrate the planning merit for an identified parcel of land (the Land), sited within the central and northern portion of the Precinct, to be included in the programmed 'Stage 2' sequence of development release. The Land is currently proposed for the Stage 3 sequence of release for the Precinct. This proposal has been informed by a strategic review of the documents currently on exhibition, as well as an analysis of the precinct context.

We set out below the key considerations supporting the inclusion of the Land within the Stage 2 release of the Riverstone East precinct. The Land is identified in **Figure 1** below. **The inclusion of this land will enable the orderly connectivity of an existing planned and gazetted neighbouring release area to the north, with Cudgegong Road Station a key transport node to the south.** A revision of the Stage 2 release boundary will not compromise the programmed delivery nor capacity of infrastructure services, namely electricity as the Land will be serviced at the same time as the proposed Stage 2 release of the Precinct. Having regard to the strategic location of the Land, and that the land will be serviced, there appears no impediment to its release and orderly development.

### 2 Identification of Land to be included in Stage 2

A review of the supporting precinct planning release investigations, in particular the '*Land use and Infrastructure Delivery Plan*' for Riverstone East (August 2015) identifies that the proposed 'staged' sequence for the release of development across the Precinct is to be correlated with the delivery of essential infrastructure services (i.e. water, sewer and electricity).

In this context it appears that the identification of the Land within Stage 3 is inconsistent with this approach as the Land will be serviced by all of the same essential infrastructure services as Stage 2 at the same time as Stage 2. The Land also provides the opportunity to connect an existing planned and gazetted priority growth area to the north of Windsor Road, namely Box Hill/Box Hill Industrial (in addition to The Gables development), with Cudgegong Road Station a key transport node. The importance and function of this connection appears to have been overlooked when defining the boundary for the Stage 2 release. Therefore, it is submitted that the opportunity to plan for and implement the 'spine' connector between Box Hill/Box Hill Industrial and Cudgegong Road Station, which is currently under construction and is due for completion in 2019, should be taken as soon as practical.

In regard to timing and delivery of key infrastructure, such as roads, the ability to implement a link 'spine' road through the Riverstone East precinct with the proposed Mt Carmel Road extension (from Box Hill), will enable the proposed business park at the corner of Windsor Road and Mt Carmel Road (Figure 2) to have a direct link to Cudgegong Road Station. Therefore the delivery of a 'spine' road, which under the draft ILP appears to be Clarke Road, should form part of the Stage 2 release but continue right through to the intersection of Mt Carmel Road and Windsor Road at the northern end of the precinct.

FIGURE 1 – THE LAND SUBJECT TO THIS SUBMISSION, OUTLINED IN 'RED' (SOURCE: BASE FROM DEPARTMENT OF PLANNING AND ENVIRONMENT, 2015)

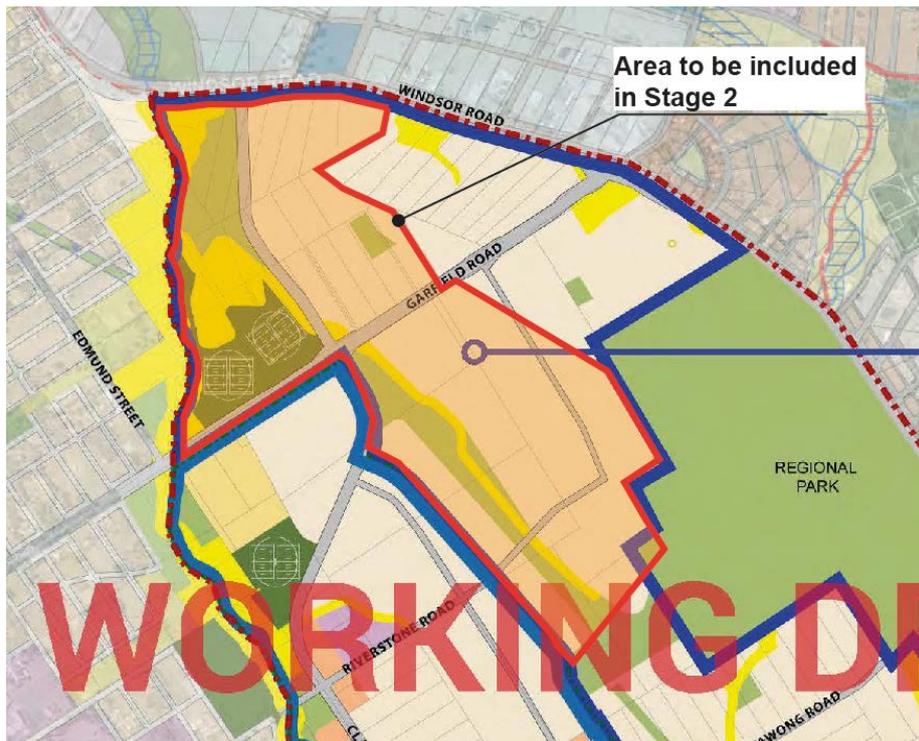


FIGURE 2 – FUTURE BUSINESS PARK, BOX HILL. (SOURCE: BOX HILL & BOX HILL INDUSTRIAL PRECINCT PLAN MARCH 2013)



### 3 Justification for inclusion of land in Stage 2

The following section provides further justification for the inclusion of the Land within the Stage 2 sequence of release.

#### 3.1 CONNECTIVITY BETWEEN EMPLOYMENT LANDS AND CUDGEGONG ROAD STATION

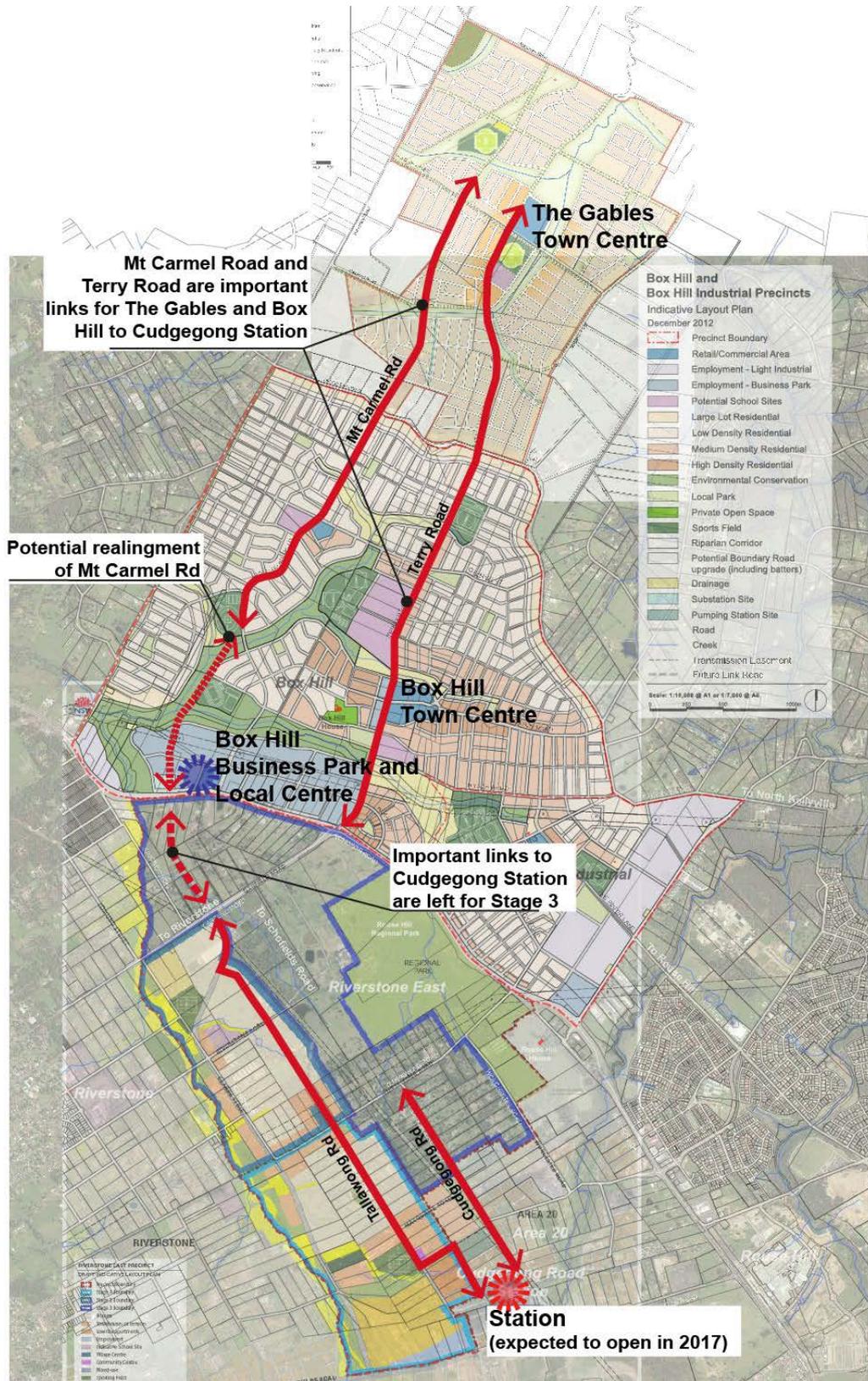
The land subject to this submission is strategically positioned between the key employment areas of Box Hill Business Park, Box Hill Industrial, the Box Hill Town Centre and Cudgegong Road Station.

The current draft ILP and staging sequence does not reflect the important role of this land as enabling key connections between the major transport hub and employment lands. The proposed realignment of Mt Carmel Road provides an important connection with Riverstone East, and should be regarded as a key connector between Box Hill and Cudgegong Station.

Further, it is understood that the timing for the delivery of the Cudgegong Road Station is currently running ahead of its programmed 2019 completion date. This further supports the need for the draft ILP to reflect the important role of the northern portion of the precinct and facilitate the connectivity between the Box Hill/Box Hill Industrial and Cudgegong Road station (via Riverstone East). Refer to **Figure 3**.

We believe that the northern portion of the Precinct plays a significant role in the precinct planning of Riverstone East, in particular in terms of connectivity and transport. This crucial role should not be overlooked given that the Land can and will be easily serviced, and therefore is consistent with the 'new approach' for planning across the North West Priority Growth Area.

FIGURE 3 – CONNECTION BETWEEN BOX HILL AND CUDGEGONG ROAD STATION. (SOURCE: BASE FROM DEPARTMENT OF PLANNING AND ENVIRONMENT, 2015)



### 3.2 SERVICES CATCHMENT

Section 3.2 of the *Land Use and Infrastructure Delivery Plan* for the Riverstone East Precinct, identifies that the rationale for staging the rezoning of the precinct is informed by the understanding that ‘*the capacity of wastewater infrastructure and electricity networks in the Precinct will not be sufficient to service future urban development*’. However, upon review of the supporting technical reports and plans, it appears that the Land may be serviced by potable water, wastewater and electricity concurrently with the land comprising the current Stage 2 release boundary as marked on the draft ILP.

The inclusion of the northern portion of land within the Stage 2 release does not appear to impede on achieving sufficient service for the future urban development of the wider precinct.

#### 3.2.1 SEWER AND WATER

The *Infrastructure Precinct Planning Report*, as prepared by Mott MacDonald, indicates that the northern portion of the precinct is captured within the First Pond Creek wastewater catchment (as shown in **Figure 4**). The *Sewer Servicing Strategy Plan* for Riverstone East (**Figure 5**) indicates that the First Pond Creek wastewater catchment includes sub-catchments C3-10, with an approximate dwelling yield of 3,357. The associated works to service these catchments with sewer and water is understood to be nearing completion (i.e. in 2015), and will provide a servicing capacity for up to approximately 3,700 new dwellings.

Therefore, having regard to the supply of sewer and water services within the Precinct, the inclusion of the Land in Stage 2 will not adversely impact on the adequate sewer and water service supply which has been planned for and is currently under construction/near completion, as well as not impede the ability for the sewer and water infrastructure to operate within the intended capacity of the catchment.

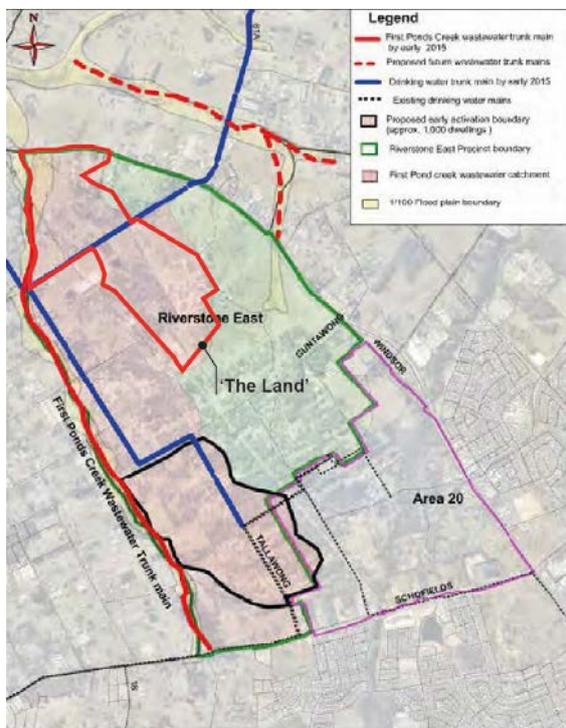


FIGURE 4 – FIRST POND CREEK CATCHMENT. (SOURCE: MOTT MACDONALD, 2015)

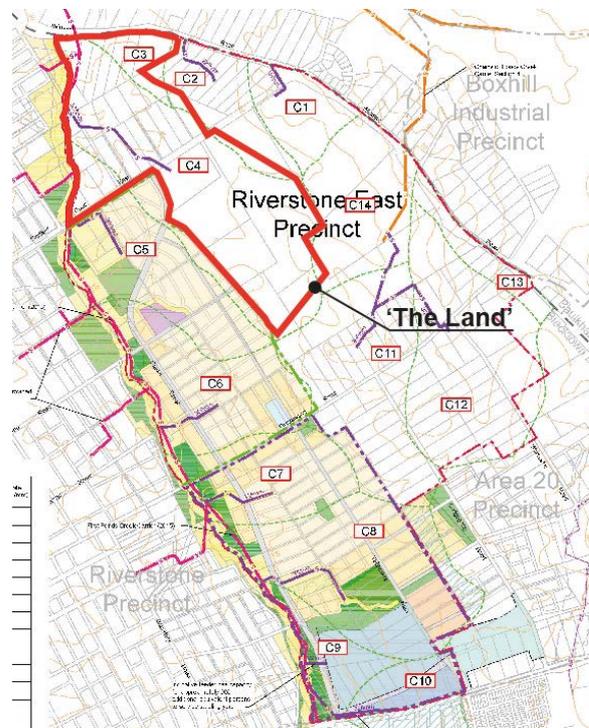
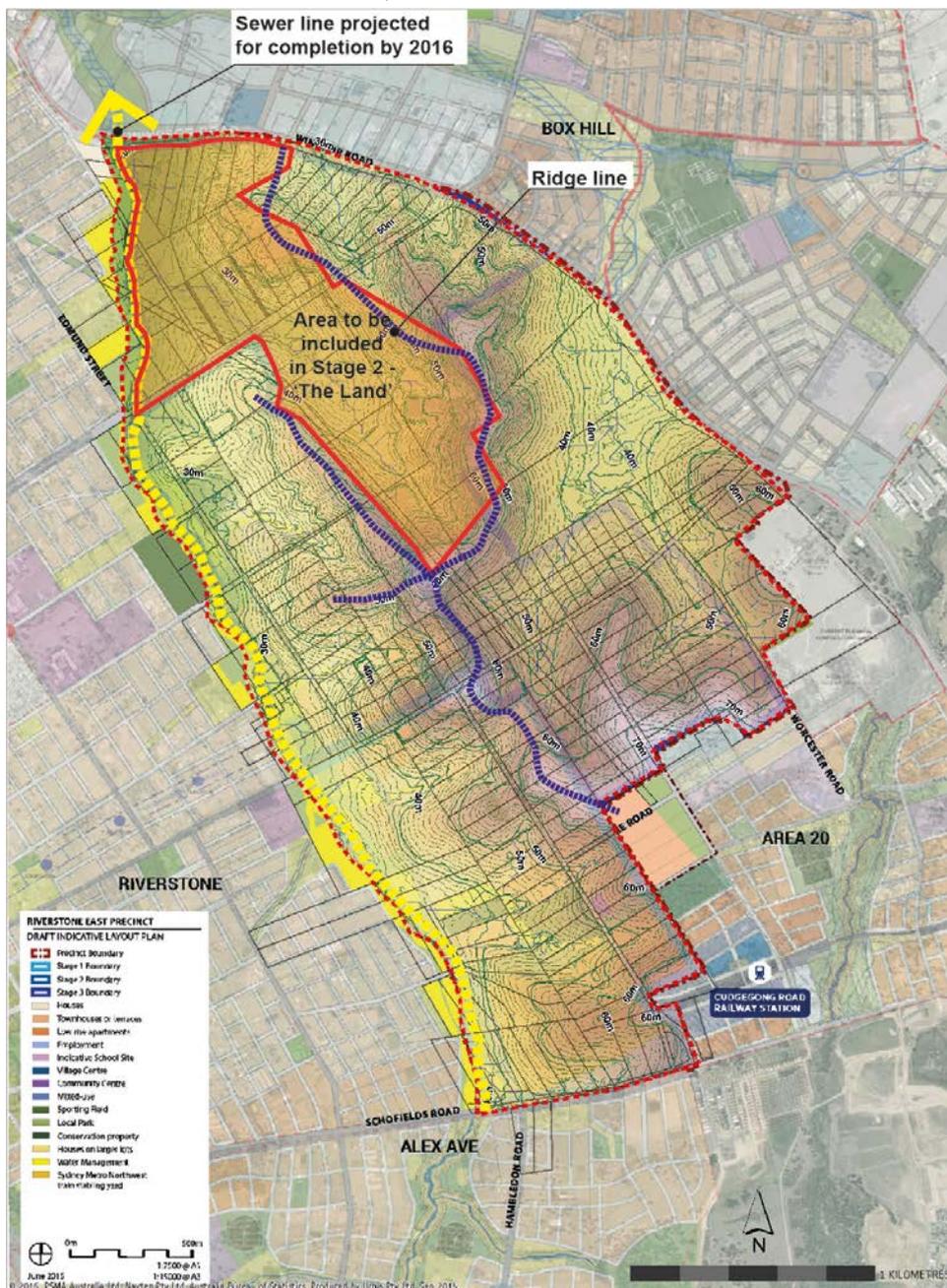


FIGURE 5 – SEWER SUB-CATCHMENTS. (SOURCE: MOTT MACDONALD, 2015)

The subject parcel of land to which this submission refers to, and its relationship with the *First Pond Creek Catchment*, is illustrated in **Figure 6** below.

FIGURE 6 – TOPOGRAPHY AND SEWER SERVICING CATCHMENT. (SOURCE: BASE FROM DEPARTMENT OF PLANNING AND ENVIRONMENT, 2015)



### 3.2.2 ELECTRICITY

The *Infrastructure Precinct Planning Report*, as prepared by Mott MacDonald, indicates that ‘the ultimate development strategy will see a new zone substation in Riverstone East / Box Hill providing power to the central and northern areas’ of the Riverstone East Precinct (refer **Figures 7** and **8**). This submission assumes that when referring to the ‘central areas’, this includes the Stage 2 release within the precinct.



#### 4 Conclusion

This submission requests that the Department review the staging plan and include the Land within the Stage 2 Release of the Riverstone East Precinct. Inclusion of the Land in Stage 2 would:

- enable the orderly connectivity of an existing planned and gazetted neighbouring release area to the north, with a key transport node in Cudgegong Road Station to the south.
- not contravene the programmed delivery nor capacity of the essential infrastructure services, including electricity, for which currently the Stage 2 release area is already programmed to align with noting that both sewer and water infrastructure to service the Land is currently being constructed and nearing completion
- ensure that serviced land is released to the market in a timely manner rather than being left unutilised given the acute current shortfall in supply of zoned and serviced land in the northern portion of the North West Priority Growth area as evidenced by recent increasing/record residential building lot land prices in the area.

We thank you once again for the opportunity to provide the above submission to the draft Riverstone East ILP.

In the meantime, please do not hesitate to contact the undersigned on 02 8233 9900 should you wish to discuss any of the above or require any further information.

Kind regards,



Carlos Frias  
Director - Design