

17 September 2015

Ms Carolyn McNally
Secretary
NSW Department of Planning and Infrastructure
23-33 Bridge Street
Sydney NSW 2000

Dear Ms McNally,

RE: SUBMISSION TO THE DRAFT RIVERSTONE EAST GROWTH PRECINCT PLANNING FRAMEWORK

1. Introduction

We make this submission on behalf of Mrs Sofronia Georgiou of 140 Guntawong Road, Rouse Hill (Lot 94 DP208203) being the Subject Property. The merits of this submission have been endorsed by the neighbours Mr Peter and Christina Heazlewood of 150 Guntawong Road, Rouse Hill.

Invoke Property has reviewed the Draft Riverstone East Growth Precinct Planning Framework that was placed on exhibition between 12 August 2015 and 18 September 2015 and provides this submission to the Department of Planning and Environment (DoP&E) requesting consideration be given to the amendment of the Draft Indicative Layout Plan (Draft ILP), Draft Residential Density Map and Draft Height of Buildings Map.

The underlying purpose of the amendments is to remove the current split controls within the Subject Property relating to zoning, height and density and extend the controls applying to the front of the site to match the adjoining land to the west given the advantageous proximity of the site to the B2 Local Centre zone, main road, and open space.

Additionally, the locality, including the Subject Property, is negatively impacted by high voltage powerlines that will have a negative financial impact on development which can only be offset by increased densities.

The amendments proposed will strengthen the urban form and viability of the proposed neighbourhood centre and maximize the opportunities presented by the main road location and nearby open space infrastructure. Further, the height and density effect on lower density land to the north will have no greater impact than that to be caused on adjoining land already benefiting from increased development potential.

It is also logical to extend this arrangement across properties eastward up to the perpendicular high voltage powerlines traversing north to south through the locality further east of the Subject Property (Stage 3 planning area) as these powerlines provide a suitable rational point of transition between medium density and low density development.

2. Land that is the Subject of this Submission

The area that is the subject of this submission is identified on **Figure 1** and is known as 140 Guntawong Road, Rouse Hill (Lot 94 DP208203). The site is approximately 2 hectares in area and is currently shown on the Indicative Layout Plan as accommodating a mix of medium and low-density residential uses with associated roads.

A high voltage powerline corridor crosses east to west across the middle of the site and contains a pylon supporting this infrastructure. The high voltage easement and pylon will remain as part of future development of the locality.

The Subject Property is to be positioned 140m east of the proposed Neighbourhood Centre to be located at the north west corner of the intersection of Guntawong and Tallawong Roads and immediately opposite a proposed open space area to be located at the south east corner of this intersection.

This land is advantageously located to benefit from both new transport connections to be provided along the main roads and Cudgegong Station further south as well as major open space/sporting facilities proposed under the Draft ILP.

The Subject Property is in a high amenity position with potential to support the viability of the local centre but is financially impacted by a limit on buildable area as a result of energy infrastructure. In this situation, it is reasonable to apply controls that promote the achievement of Growth Centre housing objectives close to services and offset economic loss for land that is impacted by constraints. This outcome has been provided for land immediately west of the Subject Property, which shares similar opportunities and constraints with 140 Guntawong Road, Riverstone.

The sections below outline the proposed amendments to achieve this outcome.

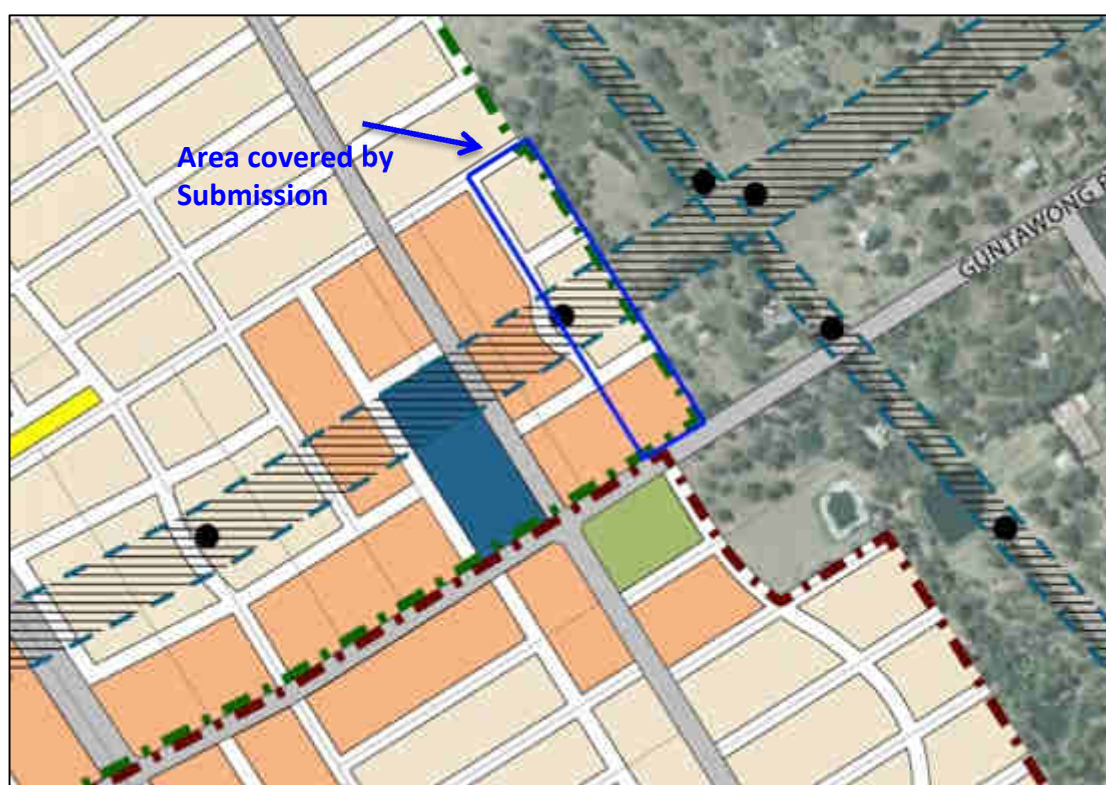


Figure 1 – Draft Riverstone East ILP showing Location of Land that is the Subject of this Submission

3. Land Use Zoning

The Draft Zoning Map indicates that the Subject property will be split-zoned R3 Medium Density Residential for the southern portion fronting Guntawong Road, with the remaining majority of the site to the north being zoned R2 Low Density (**Figure 2**).

This submission requests the R3 Medium Density zoning be expanded to apply across the entirety of the Subject Property to enable an urban form that responds to the site's close proximity to the future neighbourhood centre, open space and main roads. The increased density will also enable the financial burden of accommodating the high voltage powerlines and pylon which has rendered as a portion of the site as undevelopable and lowers the value of limited development that can be provided.

The proposed zoning arrangement will form a continuation of the zoning of the land to the west and zoning already allocated to the front portion of the site.

The expanded R3 zone will contribute to the underlying objectives of the Growth Centres initiative and enables a range of uses that contribute to the economic and sustainable provision of housing close to major transport and new public facilities.

The proposed zoning is shown in **Figure 3**.

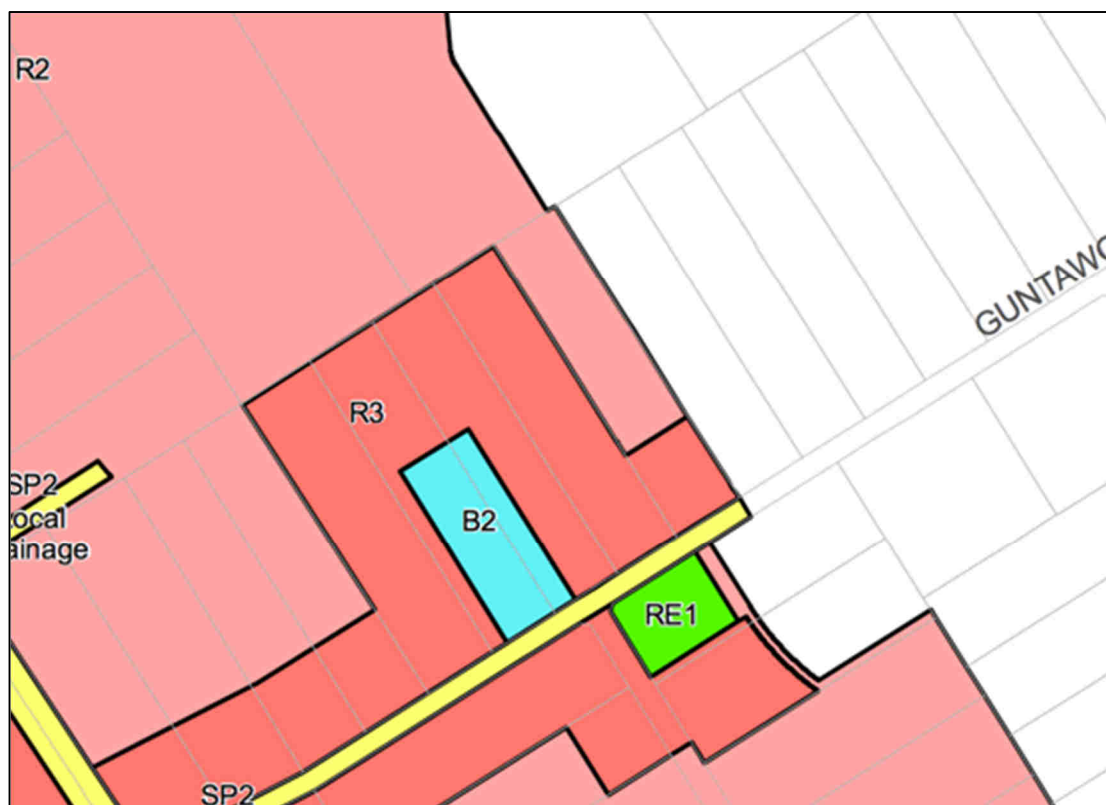


Figure 2 – Draft Riverstone East Precinct Zoning Map



Figure 3 – Amended Draft Riverstone East Precinct Zoning Map

3. Building Height

The draft Height of Buildings Map for the Riverstone East Precinct indicates that the Subject Property is to be limited to a maximum building height of 9 metres (**Figure 4**).

Where floor to ceiling heights for contemporary construction methods are considered to be no less than approximately 3.1m to allow for suitable provision of services and structural adequacy as well as being complemented by essential vertical circulation such as lift overruns, a fully compliant design would be limited to a maximum of three (3) storeys. This scale of development is considered to be a lost opportunity for a growth centre location that is within walking distance of new local centre, positioned along a main road, immediately opposite open space and within the catchment of a new railway station.

The feasibility of developing land with such high amenity for such a low outcome is also a major deterrent for future realisation of this area as costs of land purchase that have increased with the provision of the new station, parks and community facilities will significantly outweigh the financial benefit of development comprising only three (3) storeys. The added constraint of removing buildable land as a result of the site being burdened by high voltage powerlines creates an environment whereby significant negative financial impacts must be outweighed by viable development controls.

Increased opportunity for larger development up to the next height range, being 12m, would achieve a more suitable urban design outcome that permits economically viable development, creates an urban edge to the new local centre, creates improved casual surveillance of the public domain and provides the population to make new infrastructure viable.

Amending the maximum building height to 12m is consistent with the height applicable to the land to the west of the Subject Property and can be easily transitioned to the low density land further north. Additionally, as the land in question is to the south of lower density zoned land in the north, no solar access issues would result from such an amendment.

A draft markup of the recommended Building Heights Map is provided as **Figure 5**.



Figure 4 – Draft Riverstone East Precinct Height of Buildings Map



Figure 5 – Amended Riverstone East Precinct Height of Buildings Map

4. Residential Density

The draft Residential Density Map for the Riverstone East Precinct indicates that the Subject Property is to have a target of no less than 25 dwellings per hectare for the front portion along Guntawong Road and a minimum of 15 dwellings per hectare for the remaining northern portion (**Figure 6**).

Similar to the justifications provided for the maximum building height above, namely proximity to the local centre, open space, main road and railway station catchment, the minimum density target of 15 dwellings per hectare is considered too low for a growth centre area with this level of accessibility and amenity. It is requested that the entire site be applied with a minimum density of no less than 25 dwellings per hectare target as allocated to the land adjoining to the west.

By increasing the minimum target, the Precinct Plan will acknowledge the important role of the growth centres to accommodate Sydney's growing population in a manner that is sustainable and will deter the types of development that would otherwise be unsuitable for this type of location. Any resulting built form will still need to comply with the numerical controls for setbacks, height (as proposed above), and open space provision to ensure amenity is achieved whilst ensuring important land resources are not lost to underdevelopment.

The increased density will also assist in offsetting the negative financial impact of the powerlines/pylon to encourage development in a manner that is viable.

The nominated 15 dwellings per hectare for the northern portion of the site provides the wrong indication to the community that the intended type of development suitable for this high amenity position and will encourage lower forms of built form that will inevitably create a situation where the target population numbers will be unachievable or financially unviable given the powerlines. The opportunity to develop this area in a manner that is appropriate in response to the local centre, transport and open space opportunities will then not come around for at least another 20-30 years.

We note the subject site area is approximately 20,000 square metres, of which 7,240sqm is nominated for a density of at least 15 dwellings per hectare (area excluding reserve for powerlines easement and roads shown on the Indicative Layout Plan). The nominated increase from 15 dwellings to 25 dwellings per hectare for this portion of the subject Property would produce no less than approximately 11 apartments. Consideration has been given to the Blacktown Development Control Plan 2015 Residential Flat Building criteria and State Environmental Planning Policy No. 65 – Design Quality of Residential Flat Development (SEPP 65) and Apartment Design Guide. Based on these documents, and subject to future design verification, we believe approximately 20 more apartments would be permitted. Hence, a range of 11 to 20 more apartments would be anticipated and is a negligible increase on demand for services.

A draft markup of the recommended Residential Density Map is provided as **Figure 7**.



Figure 6 – Draft Riverstone East Precinct Residential Density Map



Figure 7 – Amended Riverstone East Precinct Residential Density Map

6. Conclusion

The underlying principles of economic and efficient use of land is paramount to the success of the growth centres and the Subject Property appears to be earmarked for less than ideal levels of development whilst remaining financially burdened by powerline infrastructure. Without amendment to the portion of the site proposed for R2 Low Density Zoning, maximum building height of 9 metres, and minimum residential density of 15 dwellings per hectare to match the land adjoining to the west, the locality will have lost a significant opportunity for the economic, logical and sustainable allocation of the resources being provided.

Amendment maps indicating the changes proposed in this submission have been provided as **Attachment 1** to summarise the amendments proposed.

It is requested that DOP&E favourably consider the options presented in this submission and amend the Draft Indicative Precinct Layout as well as accompanying Land Zoning Map Building Heights Map and Residential Density Map to achieve more appropriate social, economic and environmental outcomes.

It is also requested that a meeting is held between DoP&E and Invoke Property to discuss the matters raised in this submission in further detail. Please advise the most appropriate date and time for this meeting to occur. In the interim, should you have any queries please do not hesitate to contact the undersigned.

Thank you for the opportunity to provide comment on the draft Precinct Plan documents and for consideration of the matters contained in this submission.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Rick Alloggia', written over a horizontal line.

Rick Alloggia
Managing Director
Invoke Property

Attachment 1 – Proposed Map Amendments

