



JM / TG

2 October 2015

NSW Department of Planning and Environment
Draft Riverstone East Precinct Plan
GPO Box 39
SYDNEY NSW 2001

By email: community@planning.nsw.gov.au

Dear Sir / Madam

**SUBMISSION TO DRAFT RIVERSTONE EAST PRECINCT PLAN
34 - 42 TALLAWONG ROAD, ROUSE HILL**

This submission has been prepared by JBA Planning on behalf of Metro Award (Client) who is acquiring 34 - 42 Tallawong Road, Rouse Hill (the Site). As the landowner (subject to completion of a contract for sale) of a key site within the Precinct, Metro Award welcome the opportunity to review and respond to the Draft Riverstone East Precinct Plan.

We also appreciate the short extension to the submission deadline to 2 October 2015, granted to our Client's vendor Ritchie Perera of Castle Development Group on 15 September 2015.

1.0 KEY FINDINGS

Metro Award are generally supportive of the State Government's vision for the Precinct. Notwithstanding this, the proposed 16 metre maximum building height limit on the Site limits the Precinct Plan's capacity to deliver homes adjacent to high frequency rail transport. Therefore, this submission outlines the strategic rationale to increase the maximum building height on the Site from 16 metres (as exhibited) to 26 metres which will increase the potential residential dwelling capacity and housing density. It is our belief that increasing the maximum height and housing density on the Site is appropriate for the following reasons:

- The Site is adjacent to the Cudgegong Station – which will form part of the Sydney Metro network. Cudgegong Station will provide fast high frequency services to key strategic centres at Rouse Hill, Macquarie University and Macquarie Park. Locating housing close to services, jobs and education is a key goal of A Plan for Growing Sydney and will increase the number of people living within the '30 minute city' as desired by key State Government policies.
- The Site is large (approx. 4 hectares), in single ownership and unconstrained by adverse environmental factors. The Site represents an immediate opportunity for orderly high density residential development adjacent to Cudgegong Station which can act as a catalyst for the broader redevelopment of Stage 1 in the Precinct.
- The SGS '*Housing Study for Riverstone East*' identifies capacity for 5,000 dwellings in the Precinct, including 400 high density dwellings provided at 100 dwellings per hectare. This is reflected in the Draft DCP Indicative Layout Plan which identifies the site for 'High Density Residential'. The characteristics and location of the Site are ideal to provide for increased heights above that envisaged in the background documents to accommodate the higher densities. We contend that upcoming reconsideration of Subregional Planning Targets will likely

consider an increase in dwelling targets for metropolitan Sydney, specifically those sites in close proximity to high frequency rail.

- The Site is within short walking distance of future town centre retail, schools, community facilities, and public open space including playing fields and parks. Housing density should be maximised in this location to optimise convenient living close to town centre amenities.
- The proposed 26 metre height limit is consistent with the height limit on the R3 Medium Density Residential and B4 Mixed Use land immediately east of the site in Area 20 which enjoys the same level of access to the future Station and town centre amenities. It appears that the Precinct Planning process may have missed this aspect in the planning process.

These considerations are discussed in further detail below.

2.0 THE SITE

The Site is in single ownership and is identified as Lots 68 & 69 in DP 30186. Its key features are summarised below:

- The total site area is approximately 4.08 hectares (40,800sqm);
- The land falls approximately 8-10 metres (east to west) from the rear boundary to the Tallawong Road frontage – a distance of approximately 250 metres;
- It is located within 400 metres of the future Cudgegong Railway Station and forms part of Stage 1 of the Draft Riverstone East Precinct.
- The Site is not known to be affected by the following:
 - Riparian corridors;
 - Flooding;
 - Aboriginal or European heritage; and
 - Bushfire risk

The Site is located on the south eastern boundary of the Riverstone East Precinct and is adjacent to the future Cudgegong Station and town centre which are located within Area 20. The site is highlighted below in Figure 1.

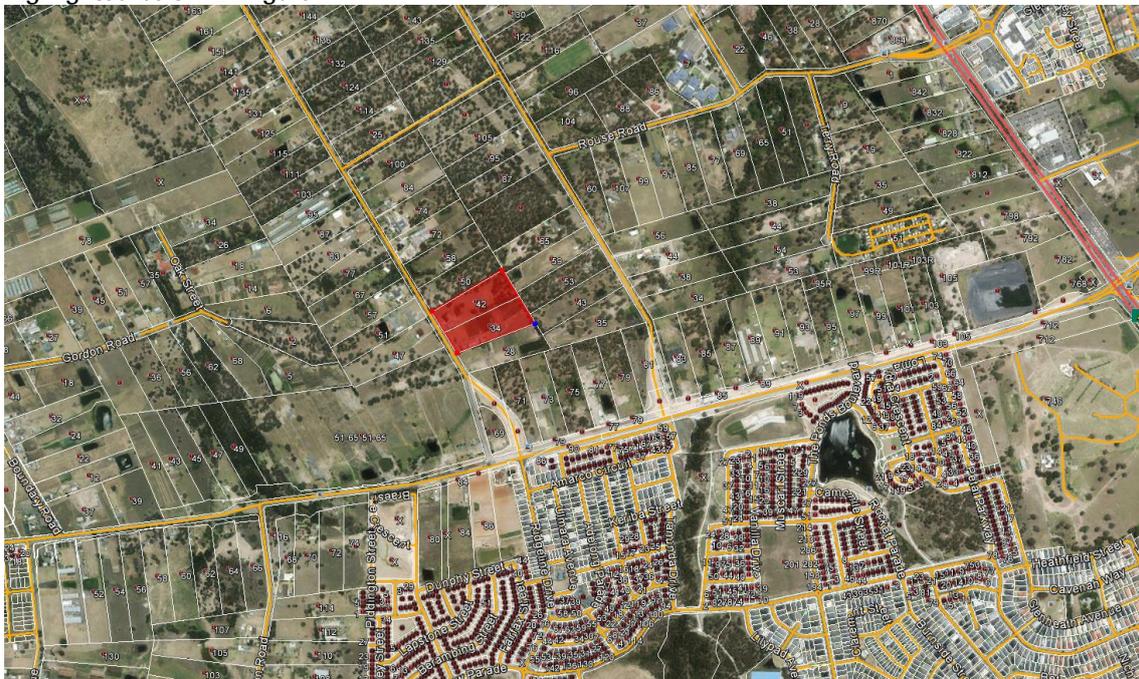


Figure 1: Site Aerial
Source: Google Maps

3.0 DRAFT RIVERSTONE EAST PRECINCT PLANNING CONTROLS

The Site is subject to the following controls under the Draft Riverstone East Precinct Plan:

Control	Site
Zone	R3 Medium Density Residential <i>Residential flat buildings are permissible with consent in the zone</i>
Height	16 metres
FSR	NA
Residential Density	Minimum 45 / hectare

The Draft Indicative Layout Plan identifies the Site as 'High Density Residential'. The immediately surrounding land uses are identified as follows:

- North – High density residential;
- South – Mixed use / rail corridor (max height limit 26 metres – Area 20);
- East – Mixed use / high density residential (max height limit 26 metres – Area 20); and
- West – General industrial (railway stabling yards).

The location of the site in regard to the Riverstone East Precinct Plan is illustrated in Figure 2.

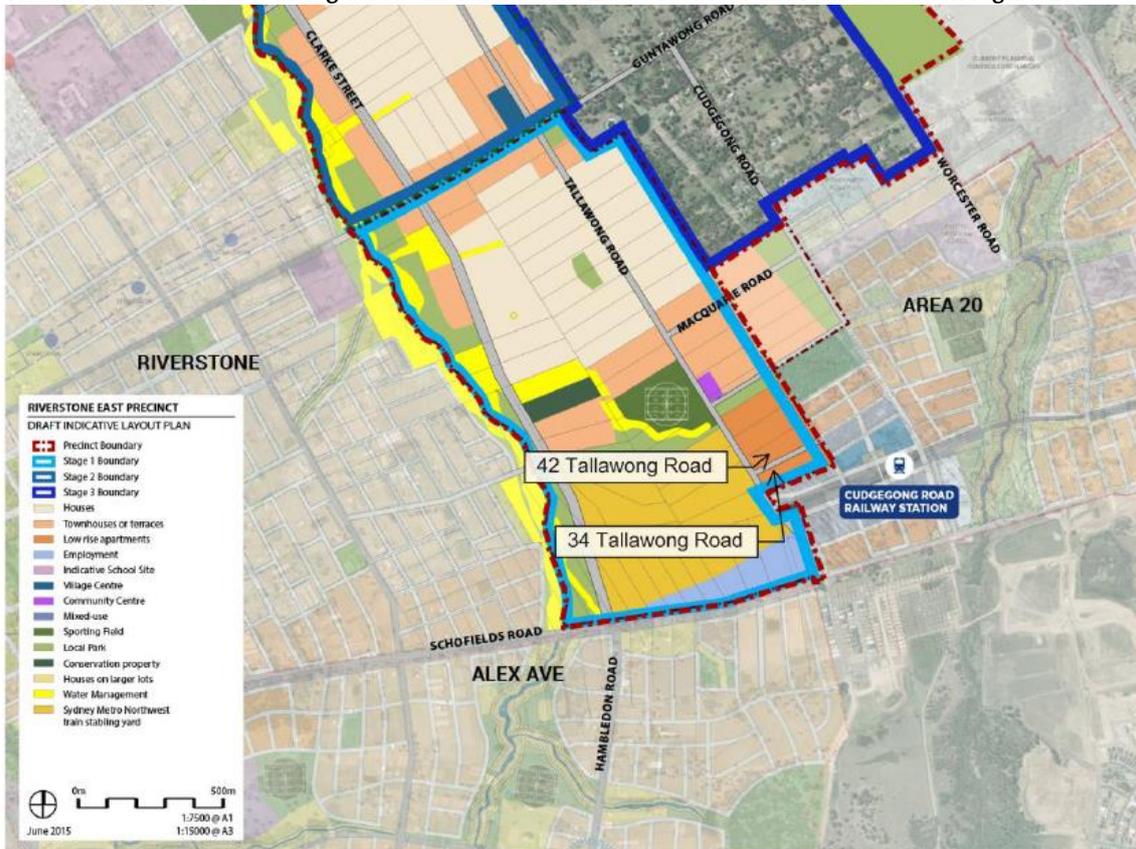


Figure 1: Riverstone East Precinct Plan
Source: NSW Department of Planning & Environment

4.0 STRATEGIC PLANNING CONTEXT

4.1 North West Growth Centre

The site is located within the North West Growth Centre under *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (SEPP SRGC). Within the North West Growth Centre, the site is located within the Riverstone East Precinct.

The Riverstone East Precinct was released by the Minister for Planning on 16 March 2013. Technical studies were subsequently prepared to determine the physical constraints, social and environmental infrastructure requirements, dwelling capacity and economic opportunities in order to inform the development of a Precinct Plan for the Release Area. It is this proposed Precinct Plan (being the draft SEPP amendment), and the accompanying technical studies and draft Indicative Layout Plan, which are currently on exhibition. In addition to an amendment to the SEPP SRGC, the Blacktown Growth Centres Development Control Plan 2006 is also proposed to be updated to provide more specific development controls in association with the future use of the land.

Together, when adopted, the SEPP SRGC and DCP will establish the permissibility for future land uses within the Release Area, and establish a framework for the assessment of future development applications.

4.2 A Plan for Growing Sydney

A Plan for Growing Sydney, released in December 2014, establishes the underlying principles for growth within the Sydney region. *A Plan for Growing Sydney (2014)* is the NSW Government's key strategic plan for guiding land use and planning decisions across the metropolitan region over the next 20 years. It sets a vision for Sydney to be a strong global city, a great place to live. Supporting this vision are four goals:

- a competitive economy with world-class services and transport
- a city of housing choice with homes that meet our needs and lifestyles
- a great place to live with communities that are strong, healthy and well connected
- a sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.

Action 2.4.1 – Deliver greenfield housing supply in the North West and South West Growth Centres contains the following directive: '*update structure plans for the North West and South West Growth Centres to realise the full potential of investment in new infrastructure.*'

In this regard, the site is located within 400 metres of the new railway station. The draft zoning of land and the Indicative Layout Plan appropriately reflect the need to increase densities around railway stations and support new infrastructure. However, the draft maximum building height will not allow the appropriate densities to be achieved on the site and is inconsistent with the land use controls on the adjoining sites to the east.

Increasing the maximum building height on the Site to allow the provision of high density residential development is consistent with, and will contribute to, the achievement of the NSW Government's key housing goals.

A key tenet of the plan is the notion of a '30 minute city' – where jobs, education, recreation and health facilities are within a 30 minute commute from the home. Clearly, allowing suitable densities proximate a high frequency rail node will allow increased housing close to services, jobs and education and will meet the tenets of key State Government policies.

Further, we would contend that upcoming reconsideration of Subregional Planning Targets could consider an increase in dwelling targets for metropolitan Sydney, specifically those sites in close

proximity to high frequency rail. Specifically, the timing of the Precinct Planning for Riverstone East would not have likely reflected revised targets now being considered by the Greater Sydney Commission.

4.3 Precinct Planning

As discussed above, technical studies have informed the development of the Draft SEPP amendment for the Riverstone East Release Area. The Draft Precinct Plan indicates that the land is free of constraints.

The *'Housing Study for the Riverstone East Precinct'*, prepared by SGS Economics and Planning, outlines the likely demand for various dwelling types and provides advice and recommendations in relation to the appropriate mix of dwelling types and densities to provide appropriate housing choice, contribute to housing affordability and maximise the commercial viability of residential development in the various parts of the Precinct and at various stages in the urbanisation of the Precinct. The Study found the following:

- The total population for the Precinct is predicted to be approximately 15,600 people;
- The total dwelling capacity for the Precinct is predicted to be approximately 5,000 dwellings;
- High density residential development is predicted to account for 8% of the total dwelling capacity (i.e. approximately 400 dwellings); and
- High density residential development is predicted to be provided at a rate of 100 dwellings per hectare.

The Indicative Layout Plan identifies the Site as accommodating high density residential development. This should be reflected by increasing the maximum building height to 26 metres which will allow the dwellings to be provided at the predicted rate within an appropriate setting.

Further, the timing of the SGS study may not have considered the implications of dwelling targets predicated on the Sydney Metro.

5.0 KEY PLANNING JUSTIFICATION IN SUPPORT OF INCREASED HEIGHT AT THE SITE

5.1 Strategic Considerations

The recent announcement of the NSW State Government of the Greater Sydney Commission (GSC) was aimed at driving metropolitan planning in partnership with State and local government. A key tenet is to *"helping Sydneysiders to get the most out of their neighbourhoods and suburbs"*. It is envisaged that revised sub regional targets and supporting plans (including key infrastructure) will be delivered by the GSC.

As a result of the long term under-delivery on housing targets, it is anticipated that these targets will be revisited – and expect that greenfield locations on heavy rail nodes such as Riverstone East will support increased densities.

This is reflected in the Premier's recent announcement of NSW State Plan 'Priorities' which include faster housing approvals – seeking Ninety% of housing development applications determined within 40 days. This site is 'shovel ready' and able to deliver on the Premier's priority.

5.2 Housing Supply

Further to the above, there is a growing and significant body of analysis which has been prepared to demonstrate the demand for housing growth in Sydney. The Property Council of Australia recently commissioned research into housing supply, titled *"Missing the Mark"* prepared by MacroPlan Dimasi which identified the following:

- Sydney is facing a housing deficit that will rise to 190,000 homes by 2024 unless local councils accelerate the number of new approvals;

- Population projections show Sydney will need to produce 31,076 homes each year, and in the last three years (which has seen a favourable market) Sydney has averaged 23,350 approvals per year.
- Priority needs to be given to new housing, including urban renewal sites along Transport Corridors and in Centres.

It is within this updated policy context, which necessitates an increase in both housing and employment opportunities based on sound planning principles of connectivity and access to jobs and transport, that the Riverstone East Precinct should be reviewed.

We consider that there is a strong argument in favour of increasing densities to maximise the urban capability of the land over and above that proposed in the Precinct Plan. Further, we are of the opinion that the locality is capable of accommodating increased densities in appropriate locations.

5.3 Increase population density at Cudgegong Station

The Site is less than 400 metres from the future Cudgegong Railway Station. The Sydney Metro Northwest will run services every 4 minutes at peak times. The estimated travel time from Cudgegong to nearby strategic centres is:

- Rouse Hill – 2 minutes;
- Macquarie University – 26 minutes; and
- Macquarie Park – 28 minutes

Increasing the density on the Site will increase the catchment for the Station. This will have the following benefits:

- Increased transport choice and reduced reliance on private vehicles;
- Increased Sydney Metro patronage and therefore higher return on infrastructure investment;
- Increase of residents living in the '30 minute city' – proximate jobs, education and services.

5.4 The site is in single ownership

The Housing Study identifies fragmented lot ownership as a critical obstacle to the rate of development in the Precinct. The subject site is approximately 4 hectares adjacent to the Station and in single ownership – with a motivated land owner keen to deliver on the Premier's priority of housing delivery.

Being in single ownership the site is therefore able to be developed efficiently and in a coordinated and orderly manner. Other sites due to fragmentation cannot provide this certainty.

Allowing a 26 metre height limit will provide certainty that the overall dwelling capacity anticipated in the plan can be achieved and the Station will be well patronised and ambitious dwelling targets met.

5.5 The proposed height limit is consistent with the adjacent sites in the Town Centre

The sites to the east within Area 20 are subject to a 26 metre height limit.

The sites have the same locational factors / characteristics as the subject site and there is no reason why the subject site is not subject to the same density and height controls.

Perhaps this has been overlooked as a result of the site being at the boundary of the Riverstone East Precinct, however correlation with the adjacent Area 20 Plan should be undertaken and a consistent planning regime enforced.

6.0 CONCLUSION

We thank you for the opportunity to engage with the Department in the development of this important precinct on the strategically significant transport infrastructure of the Sydney Metro.

We believe however, that there is the opportunity for this site at 34-42 Tallawong Road to accommodate greater development density to reflect growing housing targets on high frequency heavy rail on unencumbered 'shovel ready' sites.

This site presents the opportunity for greater housing densities within the '30 minute city' and supports the NSW Premier's priority for accelerated housing delivery in metropolitan Sydney.

Should you have any queries about this matter, please do not hesitate to contact me on 02 9956 6962 or tgoode@jbaurban.com.au.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Tom Goode', followed by a period.

Tom Goode
Director