Submission to the Department of Planning and Environment

Proponent: Castle Development Group

Address: 119 Cudgegong Road, Rouse Hill (Area 20 Precinct)

1.0 Introduction:

This report sets out Castle Development Groups submission in response to the exhibited SEPP (Sydneys Regional Growth Centres) 2006 amendment relating to the Area 20 Precinct.

Castle Development Group are a major land developer within the North West Growth Centre and seek to develop No. 119 Cudgegong Road (the subject land) into a medium density residential development.

2.0 Background:

The site is currently zoned R2 Low Density Residential, pursuant to SEPP Sydney’s Regional Growth Centres (2006). The proposed amendments to the SEPP (SRGC) relating to the rezoning of the Riverstone East Precinct include some amendments to the planning controls affecting five Lots within the Area 20 Precinct. The northern most Lot of these five Lots is the subject site, as shown below in Figure 1.
The reason for the proposed rezoning of the Lots within Area 20 is presumably so that a native vegetation screen is provided to the skyline of the Rouse Hill Estate with the proposed R3 Medium Density Residential zoning offsetting the subsequent decrease in density. The Department may also have considered the presence of the electricity easement in its density considerations.
3.0 The Site:

The site is known as 119 Cudgegong Road, Schofields, being legally described as Lots 82 in Deposited Plan 208203. It is situated partially on a ridgeline, designated “the northern ridgeline” in Blacktown City Councils DCP for the Area 20 Precinct.

The site has a frontage of 100.7m to Cudgegong Road and a frontage of 280.8m to Macquarie Road. The site has an area of 2.827 hectares.

The western and northern boundaries of the site coincide with the boundary of the Riverstone East Precinct as shown above in figure 1. Only the land to the west of the site is proposed to be rezoned as part of the upcoming SEPP amendment. The remainder will form part of stage 3 of the Riverstone East Precinct.

The site sits partially on a ridgeline and contains native trees (Cumberland Plain Woodland species). This ridgeline was identified in the Area 20 Landscape and Visual Analysis (Conybeare Morrison, 2010) as having a high degree of visual sensitivity. The site is also burdened by electricity transmission lines and an associated easement.

The properties to the south of the subject site similarly have the electricity main traversing through them and the proposed rezoning is considerate of this and purports to have RE1 Public Open Space to the east of the Electricity Easement with R3 Medium Density to the west of the Electricity Easement.

The subject site is not flood affected and lies wholly within the bio-certified area of the Growth Centres. The site is not located within a heritage conservation area and no buildings on the site are heritage items. The site has no visual relationship with any heritage items apart from Rouse Hill Estate which is approximately 1.3km away.

4.0 Context:

The following documents and plans form have been used for this submission:

- The SEPP and Maps associated with the Area 20 Precinct
- The Precinct Planning documents relating to the Area 20 Precinct, including the Indicative Layout Plan
- The proposed SEPP amendment and Maps relating to the Riverstone East Precinct
- The Precinct Planning documents relating to the Area 20 Precinct and the Riverstone East Precinct.
- A Vision for Cudgegong Road Station Surrounds
- The physical form of the site and its surrounds.

5.0 Proposed changes to planning controls

This submission seeks only to amend to the exhibited height of building control, as shown below in the below table.
<table>
<thead>
<tr>
<th></th>
<th>EXHIBITED</th>
<th>PROPOSED</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>HEIGHT OF BUILDING</strong></td>
<td>9</td>
<td>12</td>
</tr>
<tr>
<td><strong>FLOOR SPACE RATIO</strong></td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>LAND ZONING</strong></td>
<td>R3 - Medium Density Residential</td>
<td>R3 - Medium Density Residential</td>
</tr>
<tr>
<td><strong>MINIMUM LOT SIZE</strong></td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td><strong>DENSITY TARGET</strong></td>
<td>25</td>
<td>25</td>
</tr>
</tbody>
</table>

The objectives of the Height of Buildings control in SEPP (Sydneys Regional Growth Centres, 2006) are:

(a) to establish the maximum height of buildings for development

(b) to protect the amenity of adjoining development and land in terms of solar access to buildings and open space,

(c) to facilitate higher density development in and around the local centre, the neighbourhood centres and major transport routes while minimising impacts on adjacent residential, commercial and open space areas,

(d) to provide for a range of building heights in appropriate locations that provide a high quality urban form.

6.0 Justification

The key reasons to amend the exhibited SEPP controls for Height of Buildings are summarised below:

6.1 The subject sites proximity to transport routes

The site is located approximately 800m to the north of the Cudgegong Station site and as such, is within its service catchment area (per the Integrated Public Transport Service Planning Guidelines – Sydney Metropolitan Area, TfNSW, 2013).

The site is approximately 260m from Tallawong Road. Tallawong Road has been identified as a key regional bus route per the Riverstone East Precinct Transport Study (DoPE, 2015). The recommended bus spacing is 400m such that the site will be within the service catchment area of all bus routes along Tallawong Road.

The site has frontage to Cudgegong Road and any development on the site will be less than 150m to Cudgegong Road. This has also been identified as a key regional bus route.

The proposed bus Route provides good connectivity to Parramatta, Windsor, Rouse Hill, Box Hill and Marsden Park.

An increase in density to the site, bought about by an increase in the minimum height of buildings control would make efficient use of this bus network as well as capitalising on the surrounding infrastructure works and being in accordance with objective (c) of the R3 zone relating to higher densities being concentrated in proximity to transport routes.
6.2 The site is in close proximity to Public Parks

The eastern portion of the site is proposed to be zoned RE1 and this is to form part of a strip of RE1 Public Recreation with the four properties to the south of the site as shown in figure 2. Part of this land will be burdened by the Electricity Easement however a viable area of land (approx. 7800m² in size) is free of encumbrances. The proposed increase in the Height of Building control, and its subsequent increase in density will benefit from this Parks proximity to the site.

Fig 2. The area bounded yellow is the subject site.

The Park shown above will likely be for passive recreation. A more active future green space is located approximately 500m from the site as shown below in figure 3.
Fig 3. The area bounded yellow is the subject site.

Whilst proximity to green space is not an objective for the R3 Medium Density Residential Zone, it is recognised that the provision of active green space areas within higher density development sites is difficult to achieve and is best provided through good proximity to Public Parks.

6.3 The increase in height can be achieved without overshadowing existing or proposed residential areas or Open Spaces.

The Indicative Lot Layout Plan has positioned local access roads to the west and north of the site and to the west of the electricity easement. As such, there is ample space between any future development on the subject site and any development on adjoining sites.

Shadow Diagrams based on the sites maximum three dimensional building envelope have been prepared and shown below. This envelope is set 6m inside the sites boundaries, with a height of 12m above the existing surface.

The shadow diagrams have been calculated for 9:00am and 3:00pm only.

Fig 4. Shadows at March 21 9am and 3pm

Fig 5. Shadows at June 22 9am and 3pm
Fig 6. Shadows at September 23 9am and 3pm

The shadow diagrams show that there is no loss of solar access to any adjoining residential or open space land.

6.4 The increase in height can be achieved without a loss of privacy to adjoining residential developments.

Directly to the west of the site is land proposed to have a Height of Building control of 12m. This submission seeks the same control such that each development will require the same level of consideration with regards to the privacy of ground level courtyards and ground level common space.

Privacy impacts to the north are considered to be nil given that there is a planned Public Road (per the Riverstone East ILP) separating the sites.

Similarly, an existing Public Road (Macquarie Road) separates the subject site from development to the South.

To the east of the site is an electricity easement and an area proposed to be RE2 Public Recreation. This provides a buffer between the site and any development to the east, as does Cudgegong Road.

6.5 The increase in height can be achieved without significantly altering the skyline visible from the Rouse Hill Estate.

A landscape and visual analysis prepared by Conybeare Morrison International + Context Landscape Design identified the Northern Ridge (where the site partially sits), and its trees, as having the potential for visual impact to the Rouse Hill Estate Heritage item.

As this submission seeks to increase the maximum Height of Building control to 12m rather than 9m, the impact of this change to the skyline viewable from the Rouse Hill Estate has been investigated.

Contours generated by LiDAR data (purchased from Lands NSW) have been overlaid onto the cadastre (available from SIX) and a surface profile between the subject site and the Rouse Hill Estate had been generated in order to analyse the visual relationship. The land use (existing and proposed) has been below shows the shown on this profile along with the associated Height of Buildings. Figure 7 below
shows the working draft ILP for stage 3 of the Riverstone East Precinct and is the basis for any assumptions as to the future land use between the subject site and Rouse Hill Estate. Figure 8 shows the alignment of the profile. Figure 9 is the profile itself.

Development and infrastructure staging

Fig 7. The working draft ILP for Riverstone East Stage 3.
Fig 8. The alignment of the profile between the subject site and the Rouse Hill Estate.
Fig 9. The surface profile. Vertical exaggeration is 1:10
The analysis shown above demonstrates that an increase in the Height of Building control to 12m does not impact on the skyline viewable from Rouse Hill Estate. The built form in between the subject site and the Rouse Hill Estate will screen development on the subject site, as will the presence of trees on the RE1 zoned land. For our visual analysis, we have assumed what is believed to be a conservative tree height of 15m for trees representative of the Cumberland Plain Woodland community.

6.6 The proposed height limit integrates well into the surrounding built form.

To the west of the site is land proposed to have a Height of Building maximum of 12m. Adopting the same Height limit control will provide a consistent streetscape along the northern side of Macquarie Road rather than having a 3m step down in heights of the buildings.

![Fig 10. The surrounding Height of Building controls.](image)

7.0 Conclusion

We believe that our request for an increase in the Height of Building control from 9m to 12m is reasonable based on the justifications provided above and ask that submission be considered carefully.

We thank you for the opportunity to submit a submission with respect to the exhibited documents. Should you wish to discuss the above, please feel free to contact the undersigned. We would be please to discuss the above in person or by phone.

Yours Faithfully,

Aaron Gray

Town Planner