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6 October 2015

Western Sydney Infrastructure Plan PO Box 973 Parramatta CBD NSW 2124

Re: Submission in relation to land included in the Draft Riverstone East Precinct Plan known as 95 to 103 Tallawong Road, Rouse Hill

1. Introduction

This submission has been prepared by Mecone Pty Ltd (Mecone) on behalf of the landowners of Lots 34-35 DP 30186, known as 95 and 103 Tallawong Road, Rouse Hill (the subject site).

The subject site is currently used for rural purposes and is approximately 3.9 hectares in area. The site has been identified within the Draft Riverstone East Precinct Plan for future residential development, with a small portion of land identified for drainage purposes. Mecone is supportive of the rezoning of the site for residential purposes, however this submission presents an alternative recommendation for the proposed road layouts and height controls, in order to facilitate a better future urban outcome.



Figure 1 – Location of Subject Site

Source: SIX Maps

2. Draft Riverstone East Precinct Plan

The Riverstone East Precinct has been placed on public exhibition until 18 September 2015, however we have received previous advice from DP&E that this submission will be accepted until 6 October 2015. Key documents placed on public exhibition include the draft amendments to the State Environmental Planning Policy Sydney Region Growth Centres 2006 ('the Growth Centres SEPP') maps, the Draft Riverstone East Indicative Layout Plan, the Draft Development Control Plan and supporting technical studies.

The Riverstone East Precinct will be rezoned in three stages, with the draft controls on exhibition showing the proposed outcomes for Stages 1 and 2. This includes the provision of 20ha of open space, a new primary school, more than 3,000 new homes, employment land, and conservation of environmentally sensitive land.

The key standards proposed for the subject site, as identified from the exhibition documents, are outlined in **Table 1** below.

Table 1. Key controls within the Draft Growth Centres SEPP applicable to the subject site	
Clause/standard	Provisions
Land use zone	R3 - Medium Density Residential, SP2 – Infrastructure – Local Drainage
Height of Building (HOB)	The site has a maximum height of 12m (M)
Flood prone land	A portion of the site is identified as being flood prone.
Dwelling density	The dwelling density for the site is 25 per hectare (T).

The Draft Riverstone East Indicative Layout Plan (ILP) in proximity to the site is shown in Figure 2 below. The Draft ILP shows the site is to be bounded by roads on all four sides, and traversed by an additional two north-south local roads running parallel to Tallawong Road. Land to the north is proposed as Low Density Residential, whilst land will be developed for recreational and infrastructure (drainage) purposes to the west and south. The sites to the east, across Tallawong Road, are proposed for medium density development to a similar scale as the subject site.



Figure 2 – Draft Riverstone East Indicative Layout Plan Source: NSW DP&E

3. Proposed Amendments to Draft Documents

The basis of this submission focuses on two key elements proposed for the site, namely the road layout within the ILP, and the Height of Buildings control within the Growth Centres SEPP. In summary, it is proposed that the two internal north-south roads parallel to Tallawong Road (to the most eastern boundary of the site) be removed to be replaced with through site links (both public and private) and the Height of Building (HOB) control be increased to 14m to better facilitate 4-storey development on the site.

Road Layout

The Draft Riverstone East ILP shows that Tallawong Road, the Collector Road at the eastern boundary of the site, is to be supported by a further three north-south Local Streets, with the site also bounded by two east-west Local Streets (refer to Figure 2 above).

Landowners of the subject site have together formulated an indicative building envelope for the future development of their sites. When the requirements of SEPP 65, the Apartment Design Guide (ADG) and the Blacktown City Council Growth Centres Precincts Development Control Plan 2015 (DCP 2015) are applied, the provision of two internal north-south streets unnecessarily restricts the development potential of the site/s. While determining the future building envelope the following considerations have been noted:

- Building separation of up to 12m;
- Street setbacks of 6m;
- Communal open space requirements of 25% of site, achieving sufficient solar access;
- Deep soil zone provision of 7% of site;
- Maximum site coverage of 50%; and
- Internal unit solar access requirement of 70%.

Taking all these matters into consideration, there is limited potential to provide a scheme that achieves desirable outcomes for residents and the surrounding public, particularly in terms of internal unit amenity and landscaped open areas and communal open space.

Accordingly, an amendment to the ILP is therefore recommended to remove the two internal north-south streets from the subject site as shown in Figure 3 below. Under this recommendation, the two aforementioned north-south streets are removed and replaced with through site links, whilst the southern perimeter road is shifted south by approximately **8m** to evenly straddle the subject property and the adjoining neighbour.



Figure 3 – Amended ILP Source: NSW DP&E amended by Mecone

A conceptual scheme for the site has been prepared for the site that provides a total of 10 buildings of differing forms, with internal local streets replaced with through site links accessible to residents and the public (see Figures 4 - 6 and Attachment 1 for further detail). This scheme is considered to result in a better outcome for future residents and the surrounding community, with public benefits including:

- Allowing for greater variation in building design, with less restricted lots;
- Protecting view corridors to parklands to the south of the site;
- Allowing for increased communal open space provision, in the form of both private and publicly accessible spaces through the dedicated through site link;
- Improved permeability of the site for pedestrians as a result of the aforementioned through site links; and
- Maintaining a reasonable dwelling yield as a result of a more efficient layout, assisting in achieving the dwelling targets for the Riverstone East Precinct and the North West Priority Growth Area.

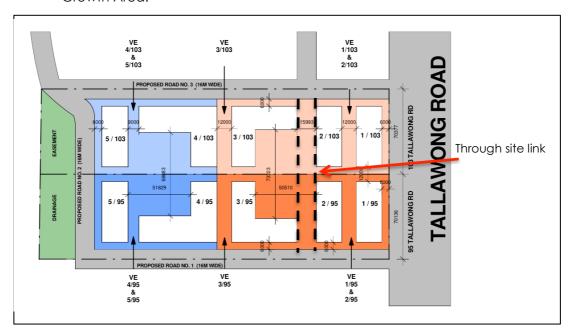


Figure 4 – Proposed Site Plan Source: Signature Property



Figure 5 – Concept image of proposed development Source: Mode Architects



Figure 6 – Concept image of proposed development Source: Mode Architects

It is acknowledged that the removal of two local streets from the site requires careful consideration of the associated traffic impacts. As such, accompanying this submission is a statement prepared by Colston Budd Hunt & Kafes traffic consultants (refer to **Attachment 2**). In the review of the traffic impacts resulting from the removal of two streets, Colston Budd Hunt & Kafes found that:

- In terms of access arrangements, the potential for access off the remaining streets is not compromised. The potential access from the remaining streets would be able to provide for the on-site resident and visitor parking in accordance with Australian Standards;
- The overall traffic generation of the site would be in the scale of 150 to 200 vehicles per hour at peak times. This would be spread between six access points along two roads adjacent to the site. The two subject streets are not required to cater for this generation, with the existing (proposed) street network having sufficient capacity;
- The two subject north-south roads would not provide any through traffic functions that are not able to be appropriately provided by Tallawong Road or the western perimeter road; and
- The southern and western perimeter roads act as key connections and would already be anticipated to cater for moderate traffic flows.

The two internal north-south streets in question would realistically only provide for traffic from the subject site. Tallawong Road and the perimeter road to the north of the site cater for all remaining traffic, while the open space to the south is catered for by the southern perimeter road. Playing fields to the south are also connected to the northern areas of the Precinct via the western perimeter road.

Height of Building

The site has been proposed with a HOB Control of 12m. We understand that it is intended that development up to four storeys is permitted within the Precinct, consistent with a number of recent approvals within the Growth Centres. As such, it would be more reasonable to adopt a **14m** height. The site is suitable for a 14m height control given its ideal location, within walking distance of future local infrastructure such as the Cudgegong Road Station, local open space and playing fields, and the future Riverstone East neighbourhood centre.

A 12m HOB control places significant restrictions on achieving 4 storey development, presenting difficulties on uneven sites and leaving little room for architectural variety, or for plant and lift overruns. This would typically lead to flat top buildings with minimal articulation. Whilst a 14m HOB control would not enable any additional level to be built, it would nevertheless provide a better architectural outcome, and as such we believe that the advantages presented by the site's location are burdened by a 12m limit.

Having the certainty of being able to comfortably provide four storey development in turn helps to provide greater housing diversity within Riverstone East, in line with the Precinct Vision for a mix of housing types for different households. Along with the potential for greater urban design outcomes, future residents will benefit from increased amenity provided from more generous apartment dimensions and access to natural ventilation and solar access.

Reference is made to the submission prepared by Invoke Property for landowners at 25 Macquarie Rd, Rouse Hill (Lot 61 DP 30186). Whilst these submissions have been prepared separately, we note that the submission for 25 Macquarie Street similarly raises issue with the 12m HOB control, and suggests a height limit of 14m instead. The issue of building feasibility is raised, due to the rapidly rising cost of undeveloped land in the Growth Centres, particularly in the vicinity of the future North West Rail Link stations. We therefore wish to reinforce the content of Invoke Property's submission.

4. Conclusion

This submission has been prepared on behalf of landowners at 95-103 Tallawong Road, Rouse Hill with respect to the Draft Riverstone East Precinct Plan, which has been prepared by the DP&E.

Mecone is supportive of the DP&E's progression with the rezoning of the Riverstone East Precinct, and we look forward to the eventual publication of the amended Growth Centres SEPP and DCP. However, as outlined in this submission, we believe that a reconsideration of two factors applicable to the subject land would result in an overall better outcome, and assist in achieving the goals set out or the precinct. In summary, our recommended controls for the site amend the Growth Centres SEPP Height of Buildings control and the Draft Riverstone East ILP as follows:

- Increase the maximum Height of Buildings control to **14m** as opposed to the currently proposed 12m; and
- Remove two north-south internal Local Streets, to be replaced at development application stage with through site links and increased public and private communal open space.

We thank you for the opportunity to provide a submission. Please contact Lauren McMahon, Mecone's Senior Planner on 02 8667 8668 or lmcmahon@mecone.com.au, if you wish to discuss this submission in more detail. Alternatively, we would be happy to attend a meeting alongside the landowners with representatives from DP&E to discuss the potential of the site further.

Yours sincerely,

Adam Coburn

Attachment 1

Indicative Concept Plans







PRELIMINARY

SIGNATURE PROPERTY DEVELOPMENTS





TALLAWONG ROAD MASTERPLAN 95 Tallawong Rd, ROUSEHILL





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Attachment 2

Traffic Statement



as Trustee for C & B Unit Trust ABN 27 623 918 759

Our Ref: JH\9934\jj

I October 2015

Transport Planning
Town Planning
Retail Studies

Signature Property Developers PO Box 6017 NORTH RYDE NSW 2113

Attention: Atul Kumar

Email: atul@signaturepropertydevelopers.com.au

Dear Sir,

RE: 95 AND 103 TALLAWONG ROAD, ROUSE HILL

- 1. As requested, we are writing regarding traffic aspects of potential future residential development on the above site. We understand that you are making a submission to the Riverstone East Draft Precinct Plan, which is currently on exhibition. The site is within the Riverstone East Precinct in the North West Growth Centre.
- 2. In particular, you have requested that we review the implications of removing two local streets which are shown on versions of the draft indicative layout plan for the precinct.
- 3. Our comments are set down through the following sections:
 - site location and road network;
 - proposed development;
 - □ future development and road network changes;
 - access arrangements;
 - likely traffic effects; and
 - summary.

Site Location and Road Network

- 4. The site is at 95 and 103 Tallawong Road, as shown in the attached Figure 1. The draft indicative layout plan (ILP) identifies the site for future residential development.
- 5. The site is on the western side of Tallawong Road, opposite Macquarie Road. The properties are currently rural uses. Surrounding land use is generally similar rural properties.

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- 6. Tallawong Road provides for two-way traffic and provides access to adjacent properties. It connects Guntawong Road in the north with Schofields Road in the south. It is currently closed to traffic south of the site in association with works being undertaken to provide the North West Rail Link.
- 7. Macquarie Road provides for two-way traffic and provides access to adjacent rural properties. It connects Cudgegong Road in the east with Tallawong Road. It has unsignalised t-intersections with these roads.
- 8. South of the site, Schofields Road provides a major east-west connection between Windsor Road in the east and areas to the west. Schofields Road is being upgraded for access between the Rouse Hill and Marsden Park town centres in association with development in the North West Growth Centre. The first stage of the upgrade, from Windsor Road to Tallawong Road, has been completed. The upgraded road provides two traffic lanes in each direction with a central median and traffic signals at major intersections, including at Tallawong Road. Stages to the west, including the ultimate connection to Richmond Road, are under construction or being planned.
- 9. Clarke Street is north-west of the site. It is identified for future extension south to connect to Schofields Road, at Hambledon Road.

Proposed Development

10. We understand that the proposed residential development on the site would include some 450 residential apartments. Vehicular access would be provided from Tallawong Road and/or future roads on the northern, southern and western sides of the site.

Future Development and Road Network Changes

- II. As noted above, the site is within the Riverstone East precinct in the North West Growth Centre (NWGC). Along with the South West Growth Centre, the NWGC will provide for a significant part of greater Sydney's housing and employment in the coming years.
- 12. The NWGC is some 10,000 hectares and includes parts of Blacktown, The Hills and Hawkesbury local government areas. There are 16 precincts in the centre, including Riverstone East.

- 13. The Riverstone East precinct is being rezoned to provide for development. The precinct will provide for some 3,000 homes, as well as parks, open space, retail uses and employment space. Ultimately, the NWGC will provide for some 70,000 dwellings and 200,000 residents.
- 14. Sydney Metro Northwest (North West Rail Link) is under construction south of the site. It will include a railway station and commuter parking at Cudgegong Road.
- 15. A town centre is being provided on the northern side of Guntawong Road, north of the site. A new road network would be provided to provide access to the redeveloped precinct.
- 16. The draft indicative layout plan (ILP) identifies the site for future residential development. Playing fields would be provided south of the site, with residential to the north and east. Areas of water management and an environmental corridor would be provided to the west.
- 17. Draft versions of the (ILP) identify new local roads on the northern, southern and western perimeters of the site, as well as two north-south roads connecting the northern and southern perimeter roads. The southern perimeter road would also adjoin the playing fields to the south. The northern and southern perimeter roads would connect to Tallawong Road. The southern perimeter road would also connect, to the west, to Clarke Street.
- 18. Draft Schedule 7 of the Blacktown City Council Growth Centre Precincts Development Control Plan 2010 (Riverstone East Precinct) includes requirements for various orders of roads for the area, including sub-arterial road, collector road, local street, streets along parks/riparian zones, laneways and slip roads.
- 19. The transport study¹ for the precinct identifies Tallawong Road as a future collector road. Clarke Street, west of the site, is identified as a sub-arterial road. At this stage, neither the draft ILP nor the transport study include detailed information regarding lower order roads. However, it would appear that many of these roads, including new roads adjacent to and through the site, would be local or lower order roads.
- 20. Experience with other sites in the North West Growth Centre indicates that some local roads in a precinct may not be provided, depending on the development of a site or sites.

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¹ "Riverstone East Precinct Transport Study." Final draft report prepared by ARUP for Department of Planning & Environment, April 2015.

Access Arrangements

- 21. Vehicular access to future residential on the site would be provided from future roads on the northern and southern sides of the site.
- 22. With the scale of development envisaged for the site (some 450 dwellings in a number of buildings), the potential for access from these streets would readily and appropriately provide for the on-site resident and visitor parking, in accordance with Australian Standards.
- 23. The two north-south roads through the site, connecting the northern and southern perimeter roads, would therefore not be required for access to the site.

Likely Traffic Effects

- 24. The overall traffic generation of the development of the North West Growth Centre has been assessed in previous planning studies for the area. These studies have considered the full development of the centre, including residential, employment, recreational and other uses.
- 25. The surrounding road network and its intersections are being planned and constructed to accommodate this future traffic growth.
- 26. Traffic generation of the potential scale of residential development on the site would be some 150 to 200 vehicles per hour two-way at peak times, based on traffic generation rates in RMS guidelines. These are modest generations which would be spread between a number of access points and roads adjacent to the site. The two north-south roads identified would not be required to cater for this relatively low traffic generation.
- 27. As previously discussed, the southern perimeter road, adjacent to the site, would connect Tallawong Road to the east with the future extended Clarke Street to the west. It would also adjoin the playing fields to the south. It will therefore carry modest traffic flows in the future in association with these roles.
- 28. The western perimeter road will connect the southern perimeter road and playing fields with residential areas to the north. It will also carry modest traffic flows.

- 29. However, the two north-south roads shown through the site would not provide any through traffic function that could not be appropriately provided by Tallawong Road or the western perimeter road.
- 30. Therefore, based on the envisaged residential development for the site and consideration of likely surrounding traffic patterns in the redeveloped precinct, there is not considered to be a need for the two north-south roads to be provided through the site, as:
 - o they would not be required for site access; and
 - they would not be required to cater for other traffic in the precinct.
- 31. It should be noted that a pedestrian connection would be provided through the site for pedestrian access to and from the playing fields to the south.
- 32. We trust the above provides the information you require. Finally, if you have any queries please do not hesitate to contact us.

Yours faithfully,

COLSTON BUDD HUNT & KAFES PTY LTD

oshratlothi

<u>J Hollis</u>

Director