

7 October 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 make 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 advise that this letter follows a previous submission made on 18 September 2015 during the formal Riverstone East public exhibition period.

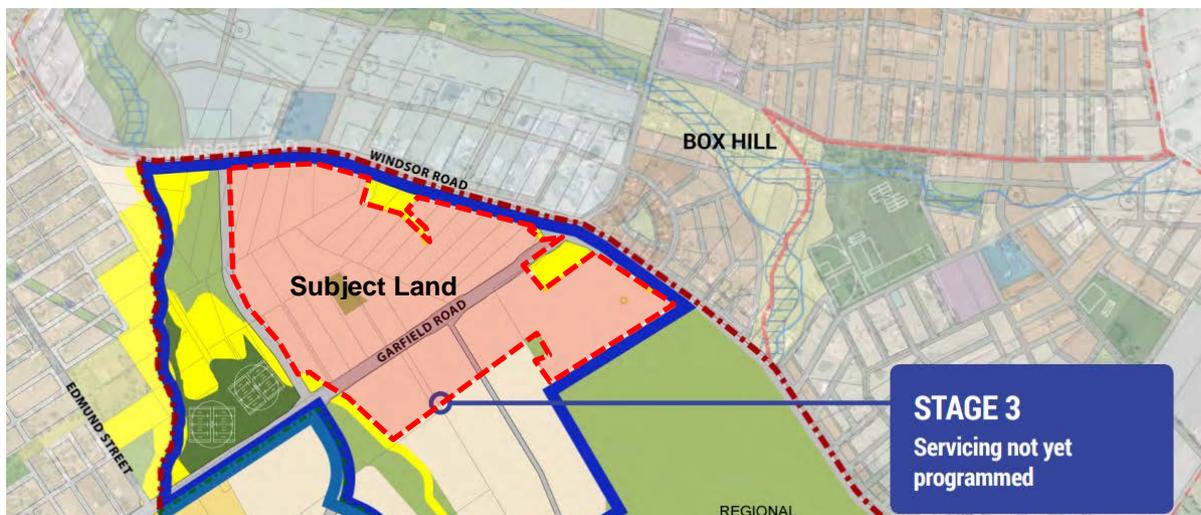
The purpose of this subsequent submission is to highlight the planning merit for reconsidering the future residential land use zoning across the identified parcels of land (the subject land), sited in the northern portion of the Precinct. The subject land, under the exhibited **Working Draft Indicative Layout Plan** (draft ILP) is simply notated as 'houses'. We have undertaken a review of the broader context of the subject land, in particular its interface with Box Hill to the north-east of Windsor Road, and it would appear that the subject land presents the opportunity to accommodate a balance between medium to high density residential in this location.

The following submission sets out a number of key development considerations for the review of residential zoning and density across the subject land as part of the further refinement of the Riverstone East precinct planning controls.

2 Site Context

The subject land is bound by Windsor Road to the north, the proposed Clark Street to the west and is inclusive of land north and south of Garfield Road. Refer to **Figure 1** below.

FIGURE 1 – THE SUBJECT LAND



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 (Refer to **Figure 4** of this submission).

The current draft ILP and the indicative land uses for the subject land, do not appear to appropriately reflect the sites strategic positioning and access to key employment hubs and transport nodes. The proposed realignment of Mt Carmel Road, from Box Hill, provides an important connection with Riverstone East, and should be regarded as a key connector between Box Hill and Cudgegong Station. The subject land and its direct interface with Windsor Road to the north, Clarke Road (extension) to the east and Garfield Road to the south, places further importance on ensuring that land use zoning and density are both complimentary to the location along key transport routes (local and regional) and the interface with the future Box Hill Business Park.

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).

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.

2.1.1 INTERFACE WITH BOX HILL BUSINESS PARK

As noted above, the subject land is located immediately adjacent to the proposed Box Hill Business Park, a key future employment hub in the North West. Therefore maximising the opportunity for housing opportunities close to key employment nodes should be further investigated for the subject land.

A review of the applicable 'Zoning' and 'Height of Buildings' provisions for the Box Hill Business Park (**Figure 2**) indicate that there is a merit opportunity to consider an appropriate form of residential, and other compatible uses within close proximity. The Box Hill Business Park (**Figure 3**) is zoned B7 *Business Park*, with a portion of land zoned B2 *Local Centre*. The B7 zone has a building height limit of 24 metres, whilst the local centre has a building height limit of 16 metres. Whilst understanding that the subject land is not a 'business park', the subject land is nonetheless strategically positioned to accommodate increased density and development opportunities that are complimentary to the adjacent form of development within the Box Hill Business Park.

FIGURE 2 – ZONING AND HEIGHT OF BUILDINGS EXTRACT FOR BOX HILL, SYDNEY GROWTH CENTRES SEPP 2006

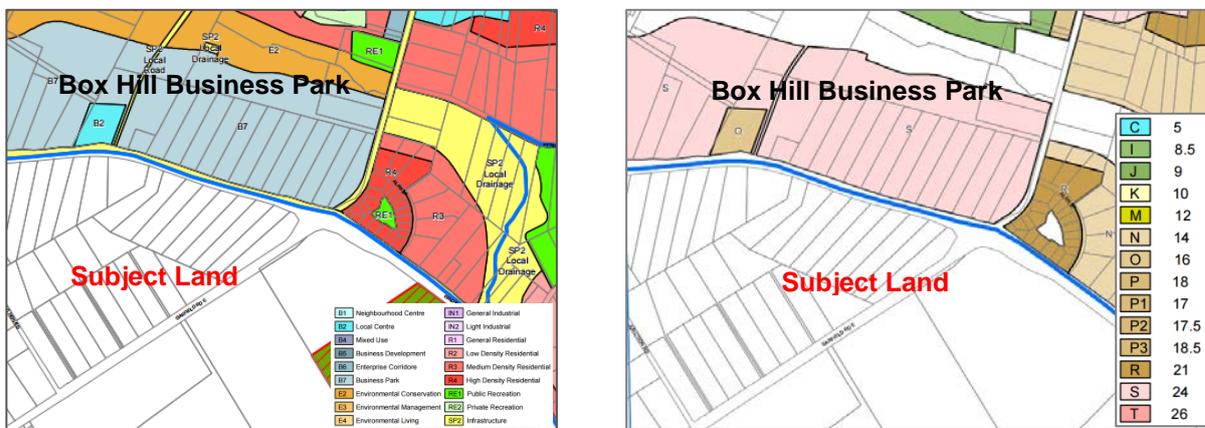


FIGURE 3 – FUTURE BUSINESS PARK, BOX HILL (SOURCE: BOX HILL & BOX HILL INDUSTRIAL PRECINCT PLAN MARCH 2013)



3 Land Use Opportunities

Since the release of the Box Hill precinct plan and zoning amendments, the State Government's commitment to and commencement of the construction of the North West Rail link has evidently resulted in a shift in the type of residential product being delivered within close proximity to key transport and business nodes (i.e. Norwest Business Park and North Kellyville). This is further supported by the release of the Department of Planning & Environment's *Housing Diversity Dwelling Density Guide* for Sydney's Growth Areas (July 2014).

The *Housing Diversity Dwelling Density Guide* recognises that the housing market is changing, and that subsequently there is an inherent need to ensure that the planning provisions encourage the delivery of housing that meets the needs of the community. The strategic positioning of the subject land at the juncture of a key regional and local transport connection, supported by a significant local employment hub to the north-east and a large Regional Park to the south, evidently indicates a need to reconsider residential zoning and density across the subject land.

The following sub-sections further highlight the key considerations which this submission seek to ensure are addressed as part of a review of the role and function of the subject lands within the Riverstone East precinct.

3.1 LOCAL CENTRE OPPORTUNITIES

The opportunity for an additional 'centre' to be located within the northern portion of the Riverstone East precinct, as indicatively indicated in **(Figure 4)** below, should be considered as part of the draft ILP review for the Riverstone East precinct. A suitable sized centre in this location could provide a convenience service sought by future residents in this location, in particular where higher densities may be located. The proposed location for a potential centre would complement the adjoining centre at Box Hill Business Park by way of further drawing residents/customers to the area, whilst being strategically positioned along a key connector road.

3.2 PROXIMITY TO EMPLOYMENT LAND

The land subject to this submission is strategically located adjacent to the Box Hill Business Park, a key employment node for the western sector of the North West precinct. Whilst the current draft ILP indicates that the subject land is proposed for 'housing', to achieve an efficient, orderly and economic use of the subject land, a review of the suitable residential zonings and densities for the subject land should be carried out as part of the finalisation of the Riverstone East ILP.

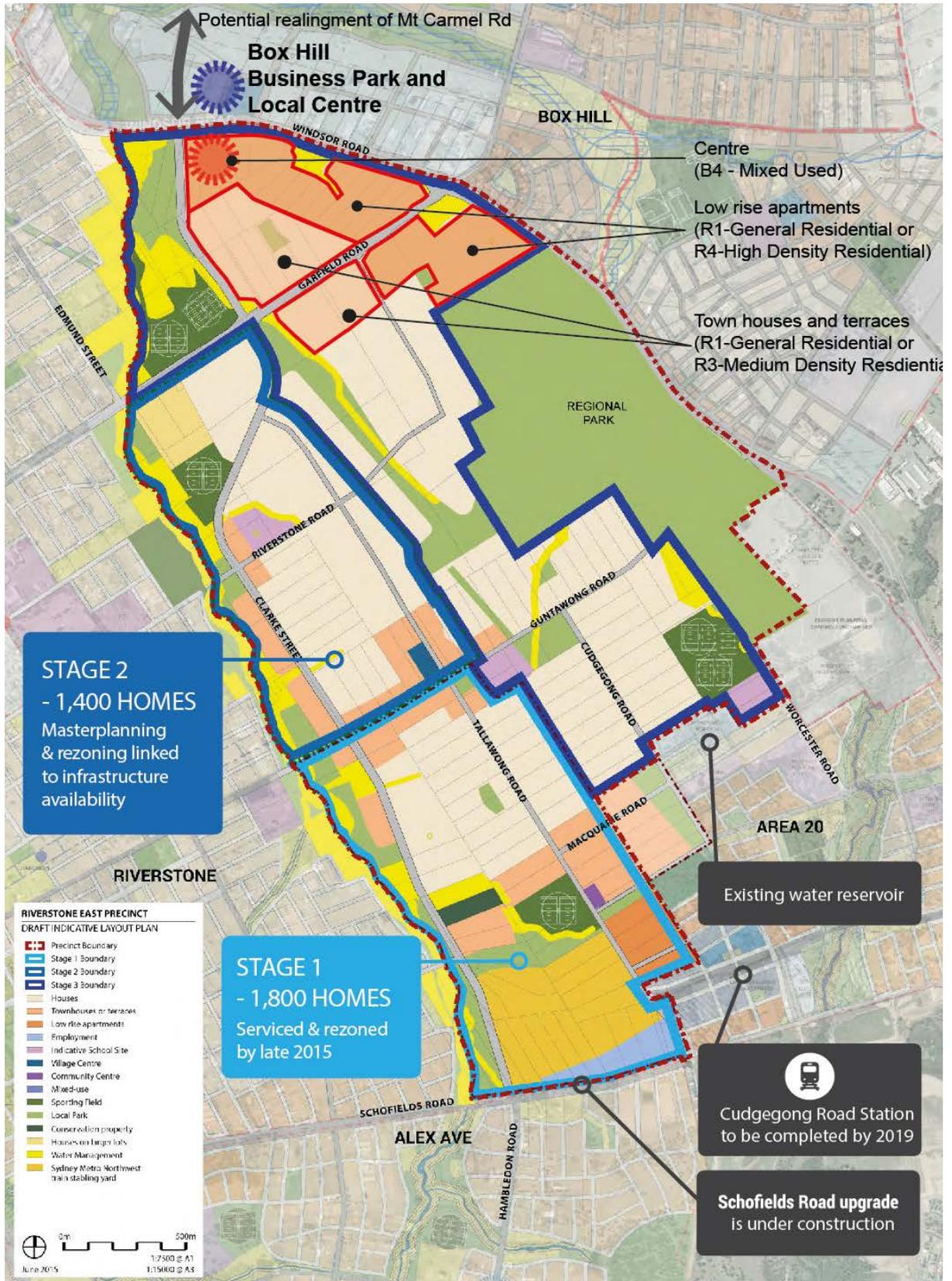
Potential residential zones for the subject land are illustrated in **Figure 4** below. The proposed residential zones give consideration to the opportunity to compliment the form and scale of residential that surrounds the Box Hill Business Park within the Box Hill precinct (i.e. R4 Residential), as well as the location of the subject land along a key connector road and adjacent to a Local Retail Centre.

3.3 FUTURE PROOFING

This submission acknowledges that it is the role of the ILP process to ensure that the release of future greenfield development opportunities can be realised without adversely impacting on the planned provision of servicing and infrastructure, at both a regional and local level. Therefore, to ensure that appropriate servicing and infrastructure capacity is planned for as part of the impending gazettal of land release across the North West Growth Centre, a review of the residential zoning and density opportunities for the subject land, should be reconsidered.

By undertaking this investigation and work now as part of the ILP process, it is envisaged that this will subsequently mitigate against future proponent led rezoning requests.

FIGURE 4 – THE SUBJECT LAND



4 Conclusion

In light of the above, this submission requests that the Riverstone East precinct planning process reconsider the opportunities to nominate land use zones for the subject land which accommodate an economic and orderly form of residential density that compliments and supports the immediate adjoining future planned uses within and around the precinct.

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