



T: [REDACTED]
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W: [REDACTED]

16 October 2015

Western Sydney Infrastructure Plan
PO Box 973
Parramatta CBD
NSW 2124

Re: Submission in relation to land identified for a school and playing fields in the Draft Riverstone East Precinct Plan, [REDACTED]

1. Introduction

This submission has been prepared by Mecone Pty Ltd (Mecone) on behalf of the landowners of [REDACTED] (the subject site). The submission relates to the Draft Riverstone East Precinct Plan, which was recently placed on exhibition by the Department of Planning and Environment (DPE).

The subject site is currently used for rural purposes and is approximately 11.2 hectares in area. The site has been identified within the Draft Riverstone East Precinct Plan for educational and recreation purposes. The aerial presented in Figure 1 below identifies the site proposed within the Precinct Plan for educational and recreational purposes and the immediate surrounds.

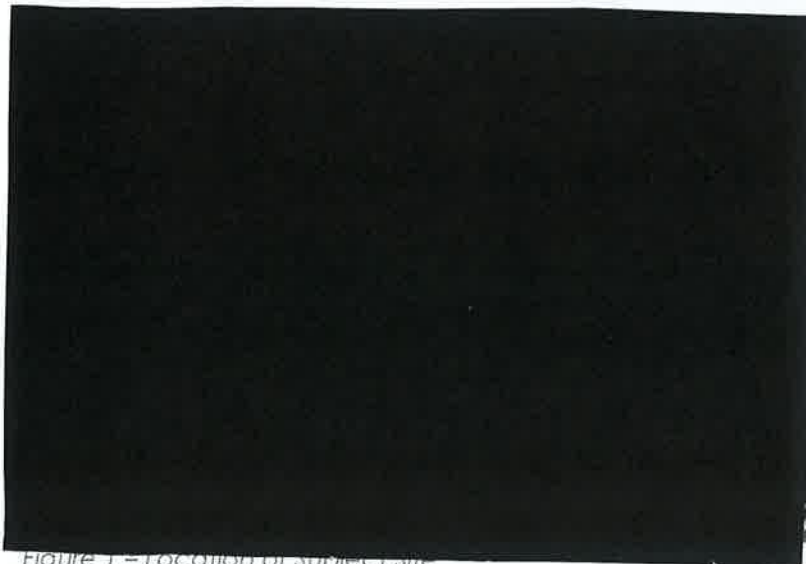


Figure 1 – Location of subject site
Source: SIX Maps

2. Draft Riverstone East Precinct Plan

The Riverstone East Precinct was placed on public exhibition in September 2015, however we have advice from DPE that this submission will be accepted until 16 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 (ILP), the Draft Development Control Plan (DCP) and other supporting technical studies.

The Riverstone East Precinct will be rezoned in three stages, with the draft controls on exhibition primarily showing the proposed outcomes for Stages 1 and 2. The subject land is located within Stage 3 of the Precinct, which has not had the level of detailed planning information prepared and released as the first two stages. As such, specific development controls and standards such as land zoning, maximum building heights, floor space ratios or street locations have not been prescribed for Stage 3.

The Draft Riverstone East ILP does however outline general landuses proposed for Stage 3. In terms of the subject site, these landuses include open space and playing fields on No. [REDACTED] and a new educational establishment on [REDACTED] (refer to Figure 2 below).

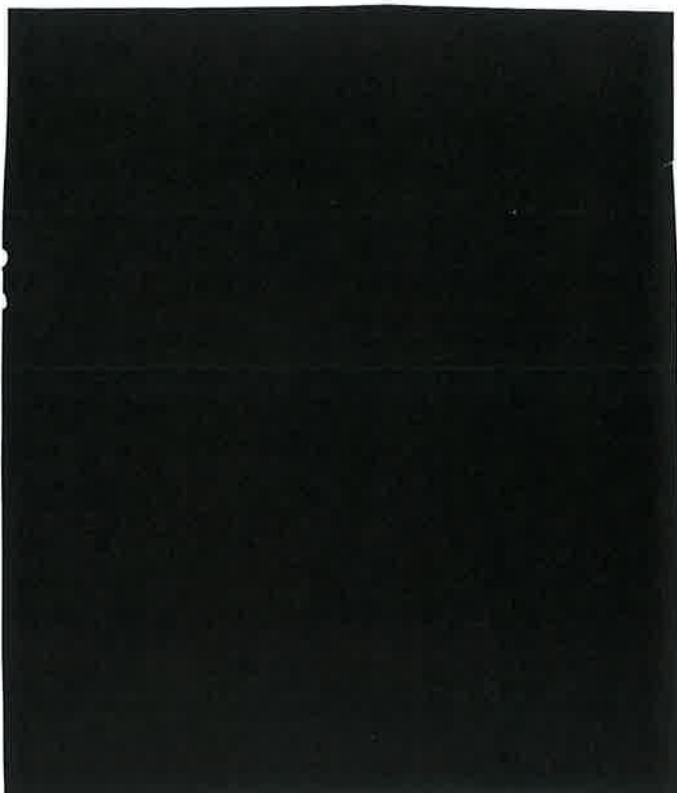


Figure 2 – Draft Riverstone East Indicative Layout Plan (Stage 3)
Source: NSW DPE

3. Site Characteristics

The subject site is located on the border of the Area 20 and Riverstone East Precincts within the North West Priority Growth Area. The site is primarily used for rural purposes, and contains a mix of dwellings types, rural structures, native vegetation and cleared land.

A primary characteristic of the site is its undulating topography. Contour maps obtained from Blacktown City Council and photos taken on site (see **Attachment 1**) demonstrate that the land is extremely uneven, with a cross fall from the southeastern to northwestern corner of approximately 20m.

4. Matters of Objection

The basis of this submission focuses on the unsuitability of the site for the proposed landuses. Schools and local open space will be acquired and developed by government authorities (NSW Department of Education and Blacktown City Council respectively). The key areas of concern arise from the site's topography, which is considered unsuitable for the location of playing fields and schools, as well as the traffic impacts that are likely to occur as a result of the school's location adjacent to the existing Rouse Hill Anglican College. These site constraints make it inappropriate to develop these sites for the nominated uses, whilst adding significant costs to such works, which are not in the public interest.

4.1 Slopes and Access

As outlined in Section 3 of this submission, the site is subject to significant issues with topography, with an uneven fall of over 20m. It is inappropriate to identify the land for playing fields and an educational establishment, due to the substantial earthworks that will be required and more onerous disabled access requirements, both costs which will need to be absorbed by public authorities, and passed onto residents through contributions and other mechanisms.

Playing Fields

Discussions have been held both with officers from Blacktown City Council's Strategic Planning and Sports & Recreation Services teams. From these discussions, we believe that the proposed location of the playing fields and open space areas will be unsatisfactory to Council, and will place a major monetary burden upon Council to carry out the necessary earthworks. This will include a need to bench the site in multiple locations, and provide a number of significant retaining walls.

Council's Sports and Recreation Services team have advised that many factors are considered in their identification of ideal sites for open space and playing fields. Topography is a key factor, with ideal sites presenting flat, useable and open spaces requiring minimal earthworks. With these factors in mind, we do not believe that the site chosen represents the best option within Stage 3 of the Riverstone East Precinct for local playing fields, which will need to be developed for the Council.

School Site

Reference is also made to the NSW Department of Education's *Educational Facilities Standards and Guidelines* (EFSG). This document provides matters for consideration and minimum standards for the elements of new school projects across the State.

Noteworthy within the EFSG are criteria under Design Guidelines *DG03-Site Factors* and *DG90 – Landscape Design*. Under DG03, the factors to be considered in selecting ideal sites for school developments include the location, available site options within the designated area, site topography, and monetary constraints. Factors such as the slope of the site are specifically referenced as a matter to be considered carefully, as this can influence the overall cost of development. DG03 further consists of design criteria for level changes, with cut and fill to be minimised, and details of maximum slopes permitted. Under DG90, the policy for new school development is to minimise site disturbance in landscape design. Giving consideration to the site's topography, these design guidelines are clearly unachievable on the chosen site, as a significant amount of cut and fill will be undertaken and the future design being compromised by the maximum grades permitted on school sites.

The location of the school site is also proposed at the highest point of a crest in Worcester Road, which is evident from the photos located at **Attachment 1**. This raises very serious safety traffic concerns. Line of sight is diminished along this portion of the road, which will be a poor outcome once a school is operational. Pick-up and drop-off areas adjacent to school sites will be heavily trafficked, and characterised by unpredictable vehicular and pedestrian movements and large crowds of children. With limited visibility for drivers approaching the

school site and the crest along Worcester Road, there is likely to be a greater potential for vehicle and pedestrian accidents.

Access

With respect to both the proposed school and playing field locations, the issue of accessibility becomes paramount. It is noted that the development of both sites for public purposes will need to be in accordance with the relevant standards for disability access, and as such we have sought advice from Accessibility Solutions to gain a better understanding of how this issue will affect future development (see **Attachment 2**).

The accessibility assessment of the site considers the impact on design and construction of school buildings and facilities, sports fields and facilities, mobility, and how the likely construction would impact on the inclusive participation of people with disabilities in terms of universal access and movement. In doing so, the following legislation was considered:

- Disability Discrimination Act (DDA);
- DDA Premises Standards 2010;
- NSW Disability Inclusion Act 2014;
- Australian Standard AS1428.1 (2009) – Design for Access and Mobility and Referenced Standards; and
- Australian Standard AS1735.12 (1999) – Lifts.

With respect to the school site, Accessibility Solutions have noted that the design of a school would require multiple building platforms connected by lifts and numerous ramps. The resultant design would create more circuitous accessways around the site, which would be more restrictive and less inclusive. There would also be difficulty in achieving compliance with the DDA Premises Standard which prohibits ramps with a vertical rise exceeding 3.6m, as the site would require at least 3 predominant building levels of approximately RL62.0, RL66.0 and RL70.0. Accessibility Solutions' report also references other schools within Sydney, such as Sydney Girls Grammar, which have attempted to upgrade facilities to become DDA compliant, at significant cost and interruption to school activity.

The sporting fields on [REDACTED] would also present design challenges for buildings constructed on the site, which would also need to comply with the DDA Premises Standards. Lifts, ramps, embankments and retaining walls could be incorporated into the design of the sporting fields but this would be at significant construction cost. Similarly, the sporting fields would require separate 'routes' for disabled persons and likely lead to a lesser degree of inclusive participation, contrary to the NSW Disability Inclusion Act 2014.

The subject sites are concluded as therefore being more suitable for residential development, as they provide good elevated land. The difficulties and costs arising from the topography would be easier to address on smaller residential sites, and are able to be implemented by the private sector.

Summary

Provision of disability access across the sites (proposed park and school sites) would be difficult to achieve, costly and require lengthy ramp structures, earthworks and retaining walls, and potentially the need to provide a number of lifts, particularly within the school site.

The cost to undertake these works would be substantial, and it is envisaged that there would also be ongoing maintenance costs and costs to ensure disabled access requirements are met in perpetuity. This is not the best use of public resources, particularly where more appropriate sites are available within the Precinct.

4.2 Transport Impacts

Concern is raised with the decision to locate the proposed school in such close proximity to the existing Rouse Hill Anglican College. The existing college is less than 100m south of the proposed location of the new school, and the location of a new larger school immediately adjacent is likely to exacerbate traffic issues for the local area.

Transport and Traffic Planning Associates have provided an assessment of the potential road, traffic and safety implications of the proposed school site (refer to **Attachment 3**). In their assessment, reference to both the road circumstances and traffic circumstances are made.

As discussed previously, Transport and Traffic Planning Associates note that the steep grades and severity of the crest in front of the proposed school site is considered problematic, as this is an area where stopping, turning and pedestrian/cyclist activity will be heightened. Furthermore, their traffic assessment also notes that the Rouse Hill Anglican College, currently with an enrolment of 1300 children, has sought to increase its capacity to 1700 with Blacktown City Council. The existing traffic generation is substantial, and with an enrolment of 1700 students the capacity of Worcester Road would be fully stretched during school arrival and departure times. The provision of a new school on an adjacent site is considered to be inappropriate, exacerbating the adverse road safety implications and causing delays and congestion.

It is noted that there has also been engagement with the Rouse Hill Anglican College on this matter, who have also prepared a submission. In his submission, which has been included at **Attachment 4**, [REDACTED], has similarly expressed concerns with the increased traffic congestion and problems which would be caused by clustering these two schools together.

5. Alternative Considerations

With the above matters taken into consideration, the site is not considered to represent the best possible location of a new educational establishment and active recreation area in Stage 3 of the Riverstone East Precinct. We therefore take this opportunity to recommend consideration of alternate sites which are better suited and minimise the financial impact to the relevant public authorities.

In our review of alternate land within Stage 3 that could be suitably developed for the same uses, we have considered the following:

- Site topography;
- Accessibility for Area 20 and Riverstone East Precinct residents; and
- Environmental constraints such as flood prone land.

Sports Field Alternative

We have identified adjacent properties along Worcester and Guntawong Roads as more ideal sites for the location of playing fields, as shown in Figure 3 below (91, 97 & 107 Worcester Road and 61 & 65 Guntawong Road). Accessibility Solutions noted that these sites have a far more gradual topography, more suitable for sporting fields and associated facilities. Being at the crossing of two major roads also allows better vehicular and pedestrian access, and greater passive surveillance of the sporting fields.



Figure 3 – Alternative Playing Fields Site
 Source: SIX Maps modified by Mecone

School Alternative

In a preliminary review of alternative sites within Stage 3 of the Riverstone East Precinct for a school, two locations have been identified. The first is located approximately 2.5km to the northwest, at 330 Garfield Road East. This location provides a new school location in an area that has been left largely void of any education establishments on the Draft ILP, north of Riverstone Road. This location is also a much more level site than the site on Worcester Road, as demonstrated by the contours at **Attachment 5**. The site levels change by only around 7m, and this is mainly on the western boundary. This is therefore an accessible and cost effective site to develop, but would also provide for greater access to schools for those in the northern parts of the Precinct, rather than the majority of new schools being clustered towards the south. This location is also close to playing fields and open space which can be utilised by the new school.



Figure 4 – Alternative School Site #1
 Source: SIX Maps modified by Mecone



Figure 5 – Alternative School Site #1 (ILP Perspective)
Source: NSW DPE

The second site that has been identified is on Guntawong Road, opposite the location we have identified for the relocated playing fields. A number of lots could potentially cater for a school at this location, including 36, 50 and 58 Guntawong Road (Lots 159-161 DP 208203), and were identified by Accessibility Solutions in their report as more suitable from an accessibility perspective. Given the depth of these lots, it is unlikely that the entirety would be required for a school site, and some land to the rear could be retained for residential purposes. This site is still within close proximity to residents of Area 20, and has good access to key transport routes such as Windsor Road, however is far enough away from Rouse Hill Anglican College as to avoid major traffic impacts. At this location, the school would also still be able to benefit from the adjacent playing fields on Worcester and Guntawong Roads.

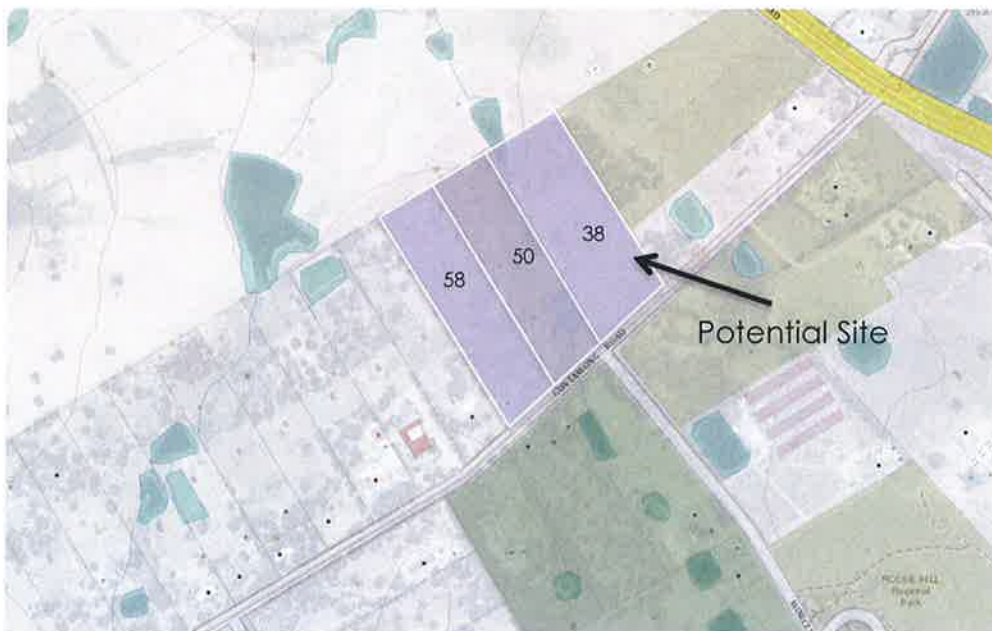


Figure 6 – Alternative School Site #2
Source: NSW DPE

These sites are examples only of potentially suitable sites within the area, and we urge the DPE to work with Council and agencies to identify the key criteria needed to appropriately, efficiently and cost effectively establish school and public recreation areas.

6. Conclusion

This submission has been prepared to the NSW Department of Planning and Environment in response to the exhibition of the Draft Riverstone East Precinct Plan.

The release of the Riverstone East Precinct overall is a positive step in addressing the need for additional housing supply in Sydney, and capturing the value of important infrastructure projects such as the Sydney Metro Northwest. However, as outlined in this submission, we believe that the sites identified in Stage 3 as the location for future educational and recreational uses along Worcester Road are not the best suited within the Precinct to cater for these developments and are inappropriate for the intended use.

In this submission, we have expressed the issues evident with the site's potential future uses. The site's undulating and steep terrain will present a range of accessibility and safety issues, resulting in additional construction and design costs inherited by Blacktown City Council and the NSW Department of Education to ensure level ground and DDA compliance. Further, clustering a new school directly adjacent to the Rouse Hill Anglican College, expected to grow to 1700 students in the future, will place serious pressure on Worcester Road and will result in congestion, delays, and safety concerns.

We have recommended two alternative school sites and one alternative playing field site within this submission, which we believe will provide a more desirable outcome when accessibility access, earthworks and construction costs, pedestrian safety, and road traffic are concerned.

We thank you for the opportunity to provide a submission. If you wish to discuss this submission in more detail, please contact [REDACTED]

[REDACTED] We recognise that Precinct rezonings are lengthy and detailed processes and as such we would be happy to attend a meeting with DPE alongside the landowners and/or Council to further assist in the consideration of the matters outlined in this submission.

Regards,

[REDACTED]
[REDACTED]

Attachment 1

Contour Maps and Photos



Attachment 2

Accessibility Statement



Attachment 3

Traffic Statement



Attachment 4

Rouse Hill Anglican College Submission

Attachment 5

330 Garfield Road East Contours



