

25 February 2016

Department of Planning and Environment
GPO Box 39
Sydney 2001

Dear Sir/Madam,

Sydney Metro Northwest Priority Urban Renewal Corridor - Draft Bella Vista and Kellyville Station Precinct Proposals

Thank you for the opportunity to comment on the abovementioned proposal for the Bella Vista and Kellyville Station Precinct, which includes land within Blacktown City.

We support the Government's initiative in planning for the transformation of these precincts into vibrant and connected communities focused on the new Sydney Metro Northwest. We especially encourage the focus on balancing new homes with creating opportunities for new businesses and jobs to help create self-contained communities.

We believe there is a lack of evidence to address the impact of the proposal on the existing local road network and required open space provision in Blacktown City. Also, the practicalities of rezoning an existing Community Title development have also not been addressed in the proposal.

Whilst we support the principle of increasing density within the walking catchment of the Kellyville Station, we believe it is premature to zone land R4 High Density Residential until further work is undertaken to outline a mechanism for achieving the intended development outcome. We suggest a staged approach to the Kellyville Station Precinct Plan, that excludes the upzoning of land in Stanhope Gardens in the short to medium term.

Our full submission on the proposal is included at Attachment 1 to this letter.

Should you require clarification or further information regarding this submission, please contact Manager Strategic Planning, Chris Shannon on 9839 6229.

Yours faithfully,



Glennys James
Director Design and Development

Blacktown City Council submission**Draft Kellyville Station Precinct Proposal**

1. Existing built form and existing Community Title subdivision

- 1.1 Existing development in the area proposed to be upzoned to R4 High Density Residential is typically less than 15 years old. These existing Torrens title residential lots form part of a 133 lot Community Title scheme that includes a swimming pool, tennis court and clubhouse that residents contribute towards and benefit from.
- 1.2 We do not believe that the redevelopment of these Community Title lots for high density housing is likely to occur in the short to medium term, given the age of the dwelling stock and nature of the existing Community Title scheme. This is supported by the AEC Economic Feasibility Report that shows that redevelopment in Kellyville will not be feasible until 2020.
- 1.3 There is no evidence provided in the exhibited documentation that discusses how the 133 lot Community Title scheme could be subdivided to enable redevelopment. The proposal should have dealt with this issue in more detail. We do not support the proposed change in zoning until such time as there is a practical solution proposed to address this matter. We would, however, support a staged rezoning of this area over a medium to longer term period if it can be demonstrated that redevelopment is reasonably practical. We raised this issue early in the precinct planning process and it should have been addressed.

2. Width of local roads

- 2.1 The existing road widths in the area proposed to be rezoned to R4 are currently too narrow to service the scale of density proposed. Local roads within the proposed R4 zone would need to be widened from their current 5.5 m carriageways (13 m road reserve) to at least 11 m carriageways (18 m road reserve) to facilitate two-way traffic movement and parking on both sides of the road.
- 2.2 We are addressing a similar concern in the North West Growth Centre. We recently exhibited a draft DCP to amend the road widths in the Blacktown Growth Centre Precincts DCP 2010, specifically to address the local road widths in higher density areas. We proposed an 11 m wide carriageway (18 m wide road reserve) across all precincts, to address traffic movements and on-street parking difficulties. We received a submission from the Department of Planning and Environment supporting the proposed 11 m wide carriageways (18 m wide road reserves) for higher density residential areas.
- 2.3 There is no evidence or analysis in the exhibited documentation on the capacity of the local roads to enable 2-way traffic movement and parking on both sides of the road generated by the increase in residential densities. Until this matter has been adequately addressed, we do not support the upzoning of land on narrow road

carriageways in Stanhope Gardens. We also raised this issue early in the precinct planning process.

3. Traffic

- 3.1 The proposed rezoning of land in Stanhope Gardens will result in a significant increase in traffic on the local road network. The existing road network and intersections were designed as part of a low to medium density masterplanned residential estate.
- 3.2 The Transport Plan estimates that only 8-9% of traffic generated by the station will be distributed within Blacktown City (Stanhope Gardens and surrounds) compared to 33% in The Hills (Kellyville). We believe this under-estimates the distribution of traffic in Blacktown City.
- 3.3 Newbury Avenue between Old Windsor Road and Perfection Avenue is already operating beyond capacity. Significant delays are experienced at this intersection, particularly during morning peak periods. To alleviate the problem and facilitate improved access to the new station precinct, Newbury Avenue between Old Windsor Road and Rothbury Terrace should be widened as part of the proposal to accommodate future growth.
- 3.4 The intersection of Ascot Glen and Newbury Avenue, located approximately 100m west of Old Windsor Road, should be closed or made into a left-in/left-out intersection. A roundabout should also be included at the intersection of Midlands Terrace and Newbury Avenue as part of the proposal to facilitate all-way traffic movements.

4. Open space

- 4.1 The provision of adequate open space and recreational areas is an integral component of the framework that contributes to the long term wellbeing of the community. The supporting documentation to the precinct plan states that the existing open space network is adequate to cater for additional demand. Our sporting facilities in and around the study area are operating at, or near to, capacity. The assessment does not state this nor does it state how the additional demands will be met.
- 4.2 The draft SEPP proposes a minor increase in open space (approximately 6,000 sq.m) to cater for the needs of the future residential population in Stanhope Gardens. The required amount of open space should be double, approximately 12,000 sq.m. This proposed RE1 Public Recreation zone encompasses 7 existing residential properties, including the Community Title clubhouse, swimming pool and tennis court. The mechanism for acquiring and providing this additional local open space has not been addressed in this proposal.
- 4.3 For this reason, we do not support the proposed RE1 Public Recreation zoned land. The redevelopment of Stanhope Gardens needs a more practical detailed consideration before any zoning changes should be contemplated.

5. Flooding and drainage

- 5.1 An outcome of the precinct flooding and drainage study recommends further investigation into the flood impact of the proposed rezoning. This investigation needs to ensure that there is no increase in flood levels in Blacktown City. It should also investigate the performance of the existing culvert under Windsor Road and identify any improvements that may be required.

6. Pedestrian and cycle paths

- 6.1 A new pedestrian bridge across Old Windsor Road will link residents in Stanhope Gardens to the station and local centre. We support this addition to the pedestrian and cycle network, but are concerned about the resulting impact on parking in nearby local streets. It is suggested that a Parking Study for the Blacktown side of the station precinct should, as a minimum, consider the following:
- a. access and connectivity
 - b. the impact on on-street parking in surrounding residential areas, particularly on the Blacktown City side of Old Windsor/Windsor Road (where pedestrian access is to be provided to station precincts)
 - c. growth in population and parking demand
 - d. potential options/sites for additional parking.

7. Minimum lot size for development

- 7.1 We are opposed to a blanket control of 600 sq.m for both forms of dual occupancies (attached and detached). We are also opposed to a reduction in the minimum lot size for multi dwelling housing to 1,500 sq.m. There is no evidence to support a change to the current minimum lot sizes that exist in *Blacktown Local Environmental Plan 2015* (the Blacktown LEP).
- 7.2 Clause 4.1B of BLEP 2015 includes the following minimum lot sizes for dual occupancies and multi dwelling housing:
- a. dual occupancy (attached) in R2 Low Density Residential zone – 500 sq.m
 - b. dual occupancy (detached) in R2 Low Density Residential zone – 600 sq.m
 - c. multi dwelling housing in R3 Medium Density Residential zone – 1,800 sq.m.
- 7.3 As this proposal is a change to the Blacktown LEP, it affects the whole of the Blacktown LGA and not just a small area in the Kellyville Precinct. We have only recently finalised an extensive process in preparing the LEP that included consultation with over 110,000 properties in Blacktown City. Our planning controls were reviewed in detail and it was determined that 1,800 sq.m for multi dwelling housing and 500 sq.m for attached dual occupancies are the appropriate lot sizes in Blacktown City. We are opposed to any change to these minimum lot size controls for these forms of development.

8. Floor space ratios

- 8.1 The draft SEPP proposes a range of floor space ratios (FSR) for the R4 zone in Stanhope Gardens. The Blacktown LEP only applies FSR controls to development in the Business Zones. High density residential development in Blacktown City is controlled primarily by height controls in the LEP, and a range of controls in our DCP. We also take into consideration the Apartment Design Guide.
- 8.2 Our experience is that FSR is problematic as a design control for residential flat buildings. We request that no FSR control be applied to high density residential zoned land in Blacktown City.

9. Building height

- 9.1 The proposed buildings of 46 m (15 storeys), 27 m (8 storeys) and 18m (6 storeys) are out of keeping with the existing character of development in Stanhope Gardens. We are especially concerned about the proposed building heights in the context of our concerns about narrow road widths and provision of open space.
- 9.2 There does not appear to be any evidence provided in the exhibited documentation that explains how the proposed building heights for the Kellyville Precinct were derived. The economic and market feasibility study does not discuss the scale of residential development, other than to note that:

"recognising that multi-level apartment buildings could be inappropriate and inconsistent with the low density character of the area, consideration for row housing (terraces) or townhouse developments could be contemplated."

- 9.3 The AEC report also comments that, based on generic feasibility modelling and after allowing for the cost to assemble a development block (including land cost with a 20% premium) in Stanhope Gardens, a minimum density threshold of FSR 2.5:1 was found to be required to facilitate feasible residential development (subject to site assembly). Although it suggests that for redevelopment to occur before 2020 densities exceeding this FSR would be required.
- 9.4 Given that high density development is not feasible in the immediate future, we do not feel it is appropriate to apply the proposed building heights at the present time. Doing so will only lead to concern and angst for existing residents who fear the impacts of rate rises ahead of any real potential to achieving the proposed redevelopment.
- 9.5 This further aligns with our suggestion towards a staged approach to the rezoning that excludes the upzoning of land in Stanhope Gardens in the short to medium term. This would alleviate the concerns of existing residents who fear the impacts of high rise development on their properties.
- 9.6 There are a total of 10 existing railway stations in Blacktown City. This will be increased when Cudgegong Station and new stations on the future extension of the Sydney Metro Northwest are completed. The planning controls for the Kellyville Station precinct need to be considered in the context of these other station precincts in Blacktown City and its role in the hierarchy.

9.7 By way of comparison, the maximum building height and FSR controls for other new station precincts in Blacktown City are as follows:

- a. Cudgegong Station Precinct – 26 m and 2.75:1
- b. Marsden Park Town Centre – 28 m and 0.4:1
- c. Alex Avenue (Schofields) Town Centre – 18.5 m and 3.5:1.