

Submission: The North West Priority Growth Area Land Use & Infrastructure Implementation Plan Proposed Changes to Residential Density Controls

3rd July, 2017

The Department of Planning & Environment
NSW Government

Dear Sir/Madam,

We appreciate the opportunity to provide feedback to the proposed Amendments to the Growth Centres SEPP which will impose Residential Density Controls Ranges as proposed in The North West Priority Growth Area Land Use and Infrastructure Implementation Plan.

We can understand the requirement for maximum density controls for residential areas, however, we strongly object to the imposition of a maximum density of 20 dwellings/Ha for the R2 zone within the Box Hill Precinct. There are negative impacts for holders of R2 land. To facilitate orderly development of the R2 land in Box Hill we propose that the maximum density control for R2 land in Box Hill be set at 25 dwellings/ Ha to be consistent with the maximum residential density control for Blacktown precincts.

The reasons for this are:

1. It is not the R2 zone where residential targets have been far exceeded - that has been happening in R1, R3 and R4 zones.
2. We believe 25 dwellings/Ha as a maximum for R2 will better meet the objectives of the Residential Density Controls in *The Hills Growth Centre Precincts Plan* given that many R2 sites are now under development or DA approved under the prior Density rules. Below is outlined our arguments for a maximum of 25 dwellings/Ha rather than 20 dwellings/Ha with regard to each objective:

A) to establish minimum density requirements for residential development within the Box Hill Precinct or Box Hill Industrial Precinct,

* Development is well underway of the R2 Zone and the remaining land holders should not be punished by being used to resolve the excessive Density so far approved in R1, R3 and R4 zones.

* The 300 m² minimum lot size already ensures that developers in the R2 zone do not exceed anticipated dwelling densities for the R2 zone.

B) to ensure that residential development makes efficient use of land and infrastructure, and contributes to the availability of new housing,

* If the target is set at 20 dwellings/Ha, the number of lots on our block will be reduced. This erodes the value of our land and will make it harder to sell than it already is, further highlighting the effects on R2 land holders.

* A lower maximum of 20 dwellings/Ha will increase residential lot sizes, putting upward pressure on lot prices, making the house prices a lot less affordable and desirable to buyers.

* If approvals have already been given to developments that far exceed density targets, then the infrastructure should be upgraded to handle the added density rather than remaining landowners being punished. It should not be a policy of "First In, Best Dressed" rather than orderly development of the Box Hill Precinct as it was strategically planned. The remaining R2 landholders should not bear the brunt of correcting infrastructure issues that arise from State & Local Council approval of overdevelopment in other zones. This should have been an issue anticipated long before the approval and commencement of the Box Hill Precinct.

* An R2 maximum of 25 dwellings/Ha would be a more efficient use of land. One or two extra dwellings on my land will not be "the straw that breaks the camel's back" in terms of availability of infrastructure (when overdevelopments in R1 or R4 exceed by hundreds of dwellings per hectare).

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* Other parts of the Growth Centres such as Blacktown have a higher density target of 25 dwellings/Ha.

* A lower density target of R2 land in Box Hill places additional barriers to development of properties along Old Pitt Town Rd which have a mix of R2 large lot and low density. Currently, there is very little interest in the 2000 m² large lot area. Most R2 sites in Box Hill that are not partially 2000 m² large lot already have DAs approved or lodged. It is only a small area of R2 which still remains. Changing the maximum density control to 25 dwellings/Ha would have very little impact on the Box Hill Precinct density targets. Ideally, the large lot band should be removed to facilitate development. What would be the demand and affordability of large lot areas be and how would this affect land holders? If people are finding housing affordability difficult now, on a small sized lots, generally who would be able to afford a larger lot? Who is the intended target group? One could confidently presume, the target group would a very select and small percentage of buyers, therefore putting land holders at a disadvantage.

* Restricting the density of the R2 zone will encourage developers to choose to develop in other development areas with higher upper density limits giving higher yield and more affordable, marketable lots.

C) to ensure that the scale of residential development is compatible with the character of the precincts and adjoining land.

* Many Development Applications have already been approved for R2 land with development in progress, including our immediate neighbours with common roads adjoining our property.

* The remaining R2 sites should not be impeded from developing in the same character as surrounding R2 sites because of overdevelopment in R1, R3 and R4 zones.

* A maximum of 25 dwellings/Ha would retain the status quo and allow orderly development with regard to adjoining and surrounding sites already approved for development.

3. The Valuer General's Office uses previous sales of surrounding similarly zoned land to determine new land valuations for purposes of Council Rates and Land Tax. If those sales were based on different development potential than is now proposed, then our property will be de-valued and the assessment basis for our Council Rates is false and should be reviewed.

We are very concerned that residents in Box Hill, as owners of land negatively impacted by the proposed maximum Residential Density Controls, were not notified by the Department of Planning & Environment prior to the Amendments being placed on Exhibition from 15/5/2017 to 27/6/2017. There are many other residents of Box Hill who are unaware of the changes proposed and hence will not have an opportunity to place submissions. It should not be up to landowners to advise each other about potential detrimental impacts to their property values and saleability.

As R2 landholders we are being penalised for overdevelopment in other zones. An increase from 20 dwellings/Ha to 25 dwellings/Ha as a maximum density control for the R2 zone is not unreasonable and is consistent with the maximum proposed for Blacktown precincts. We appreciate the opportunity to put forward this submission and please contact us if you wish to discuss any parts of our submission.

Yours Sincerely,

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