

NSW Department of Planning & Environment
10 Valentine Avenue,
Parramatta, NSW 2150

Sent via Online Submission by the owners of 72 Tallawong Rd, Rouse Hill, NSW, 2155.

04 July 2017

Dear Sir/Madam,

RE: Submission in response to Northwest Draft Exhibition Package.

Subject Site Street address: 72 Tallawong Rd, Rouse Hill, NSW, 2155

RDP: 65//DP30186

Land area: 5 Acres

Proximity to the Northwest Metro Rail Station: 400 metres – five-minute walk



Figure ONE: Aerial view of the “greenfield” site at 72 Tallawong Rd Rouse Hill, NSW.

The Department of Planning are currently exhibiting the "North West Land Use and Infrastructure Implementation Plan" (The Implementation Plan). The proposed changes on exhibit, relate to altering the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006*. And also the applicable *Growth Centre Development Control Plan 2017*.

The proposed changes including the proposed introduction of a maximum density cap of 25-35 dwellings per hectare for 72 Tallawong Rd, Rouse Hill (herein referred to as the site), don't make planning sense.

If implemented, they would lead to a poor outcome for the residents of Sydney. The proposed changes ignore directives to promote transit oriented development that would lead to social, economic and environmental benefits for future communities, noting the site's close proximity to the Northwest Metro rail station, associated amenities and ample open space.

The exhibited changes to the site are not evidence-based as they are at odds with the recommendations found in the exhibited technical studies.

They also contradict the objectives and recommendations of the statutory framework that ought to be underpinning planning including the Implementation Plan itself.

There is an undeniable consensus in current planning policies, that sites within close proximity to train stations (especially in the growth centres of North West Sydney) should be prioritized for higher density planning controls.

Our submission is that the proposed density cap on the site is abandoned, in favour of a higher density range of at least 100 units per hectare in line with other similar properties in close vicinity to the site and the new Northwest Metro rail station.

If the changes as exhibited were to be implemented the result would be, that there are less homes available next to the new train station located between Tallawong Rd and Cudgegong Rd due to open in 2019. This is despite the fact that there is already limited availability for residential development in the area, due to land space occupied by the stabling yards. This is completely inconsistent with the stated objective of the implementation plan and there is an absence of an adequate justification for this proposal.

There is no justification in the government investing billions in the Northwest metro train line, only for the Department of Planning to propose changes that will significantly reduce the number of homes available in such close proximity to the station. The proposed changes to planning controls for the site, would prevent the area from meeting its full potential through missed opportunities to maximize social, economic and environmental advantages of transit oriented development. The potential benefits that would be lost would be encouraging a reduced reliance on private cars, increased transport connectivity for a greater proportion of residents, the opportunity to supply the increasing demand for more affordable and denser housing options near trains and the lost opportunity to promote fast-uptake of the new metro line.

The proposed planning changes to limit the density to 35 dwellings per hectare, would not meet the expectations of the general public. The exhibited changes to the site, are not in the public interest and fail to achieve the desired outcomes for the North West Growth areas as espoused in various statutory planning documents.

The proposed density cap for the subject site is particularly low, despite the property's close proximity of 400 metres (five minutes walking distance) to the train station and associated amenities such as the proposed retail centre.

Furthermore, the property is a "greenfield" site that would not entail the wasteful exercise of bulldozing existing homes, as is likely to be the case along other Northwest Metro Stations.

The site is entirely free from building constraints and is ready for development.

Not only is the site within easy walking distance to the station, it is also surrounded by ample open space and parks. It is within a couple of minutes walking distance to Cudgegong Reserve and the new sporting fields on Tallawong Rd.

Furthermore, the position of the site is in area where the availability of land for residential purposes is already highly limited. The site, 72 Tallawong Rd, Rouse Hill, is located in very close proximity to sporting fields and stabling yards already located on the southern portion of Tallawong Rd, Rouse Hill. The residential population of Riverstone East will always be limited by this industrial usage.

Planning outcomes should not be compromised by any possible differences in “bargaining power” of developers and original landowners. Example developers who now own properties in areas that were released prior to the subject site, such as those in Area 20, as opposed to original landowners in Riverstone East.

The public interest and the interest of the future community should be paramount. This is best achieved through consistency in planning decisions. The proposal to allow higher densities in area 20 than those proposed in Riverstone East is arbitrary.

Both of these “planning precincts” are currently part of the same suburb of Rouse Hill within Blacktown City Council. Blacktown City Council is proposing that they remain within the same suburb but be renamed in coming years to either Tallawong, Cudgegong Rise or Whitlam Heights. The new Metro train station is located between Tallawong Rd and Cudgegong Rd. As such there is no justification for the variances between the proposed density restrictions in these two planning precincts.

Further-more the fact that there have been approvals for higher density developments in areas that lack easy access to transport and amenities is not a reasonable reason to limit the development potential of this site, and sites similar to it in the Stage 1, of the Riverstone East Area.

The scope of the proposed changes are wide-ranging and cover a large geographical area, It is clear that the unique characteristics of this site (72 Tallawong Rd, Rouse Hill) has not been adequately taken into consideration. It is an area that already has very limited capacity for residential development (due to the stabling yards in particular) despite its excellent location of being within five walking distance of multiple parks and the new Northwest Metro train station. We request that site be specifically reviewed and zoned with a higher residential density allowance to at-least a range of 100 dwellings per hectare, to maximize its development potential.

It is clear that the best outcome for the community is for the whole parcel of land to be zone R3 with a range of permissible housing density of at least 100 dwellings per hectare in order to maximize the development potential (remove the zoning for road and park on the subject site).

It is in the public interest to develop this site, to its full potential. Potential positive outcomes for the community should not be compromised by less than optimal planning outcomes in other areas where developments have already been approved. We note that it is strange to retrospectively zone areas with maximum dwelling caps, if developments have already been approved in those same areas, that exceed those limits. There should be transparency if this has occurred (information be made publicly available) and these issues ought to be addressed in those areas. It is not permissible for the planning of Riverstone East to be an “after thought” given its prime location along the North West Metro.

The proposal to cap density to a maximum of 35 dwelling on the subject site, just isn't logical. It is in the public interest for this site to be prioritized for high density residential development of a range of at least 100 dwellings per hectare if not higher.

Figure TWO: The below document and photo distributed by Transport for NSW, evidences the sites extremely close proximity to the New Metro Train Station between Tallawong and Cudgegong Roads, the extensive stabling yards located nearby, and extensive open space within close proximity such as the sporting fields and Cudgegong Reserve.







What we will do to minimise impacts:

- Traffic control will be in place to assist motorists with the temporary lane closure of Tallawong Road and postponing of unloading equipment until normal construction hours
- Positioning lighting to face away from residential properties Use of water carts to manage dust as required
- Implement traffic and pedestrian control measures where required

Works will generally occur between 7am and 6pm, Monday to Friday and 8am and 1pm on Saturday. Low impact activities such as concrete finishing works, refueling of machinery, environmental controls and the running of generators may occur outside of these hours where required.

To make a complaint, register for email updates or for more information phone 1800 019 989 (operating 24 hours a day, 7 days a week), email us at trains@metronorthwest.com.au or visit www.sydneymetro.info. Thank you for your patience and cooperation while we carry out this important work.



Above: Sydney Metro Trains Facility and Cudgegong Road Station construction site including work area


Figure THREE: The below document and photo distributed by Transport for NSW, evidences the sites extremely close proximity to the New Metro Train Station between Tallawong and Cudgegong Roads, the extensive stabling yards located nearby, and extensive open space with sporting fields and Cudgegong Reserve. The site of 72 Tallawong Rd, Rouse Hill, NSW is highlighted in the Fuchsia colour below.

Tallawong Rd Stabling Yard


Metro Station

Location of Sporting fields

72 Tallawong Rd Rouse Hill



northwest
rapid transit



NSW
GOVERNMENT


Transport
for NSW

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- Positioning lighting to face away from residential properties Use of water carts to manage dust as required
- Implement traffic and pedestrian control measures where required

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Above: Sydney Metro Trains Facility and Cudgegong Road Station construction site including work area

Figure FOUR –Aerial view – source

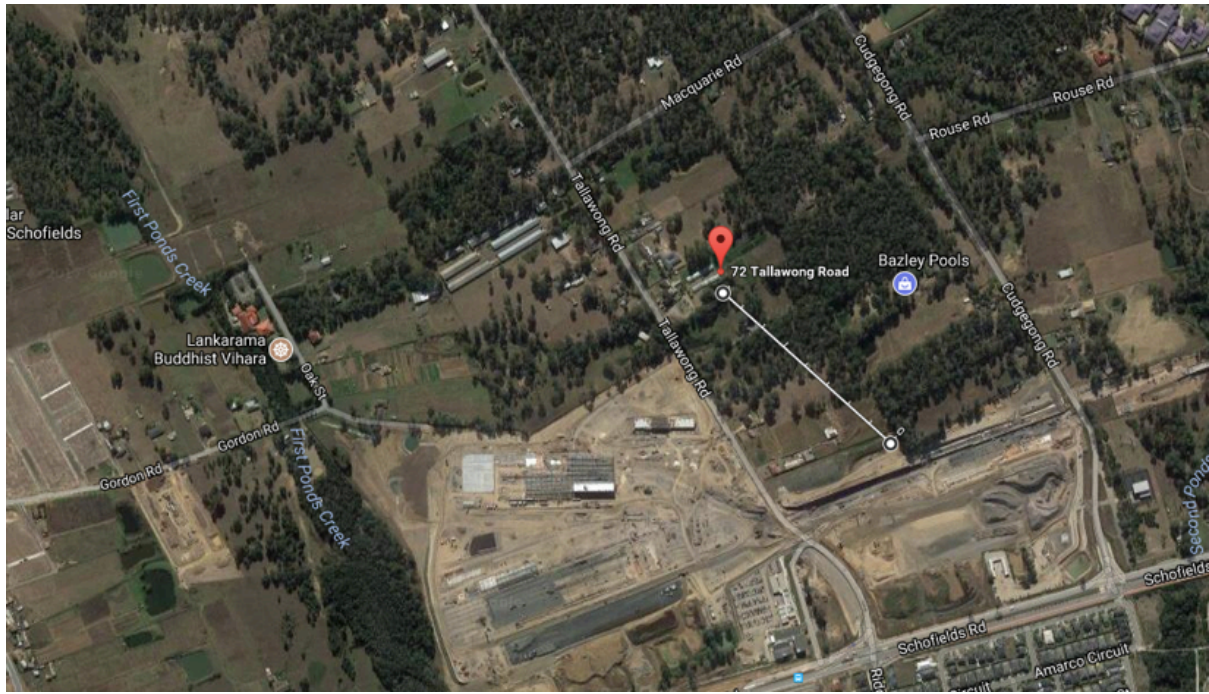


Figure FIVE: The diagram below of the indicative layout plan highlights the site's close proximity to open space, the Stabling yards (which is not available for residential development) and the Northwest Metro Station.

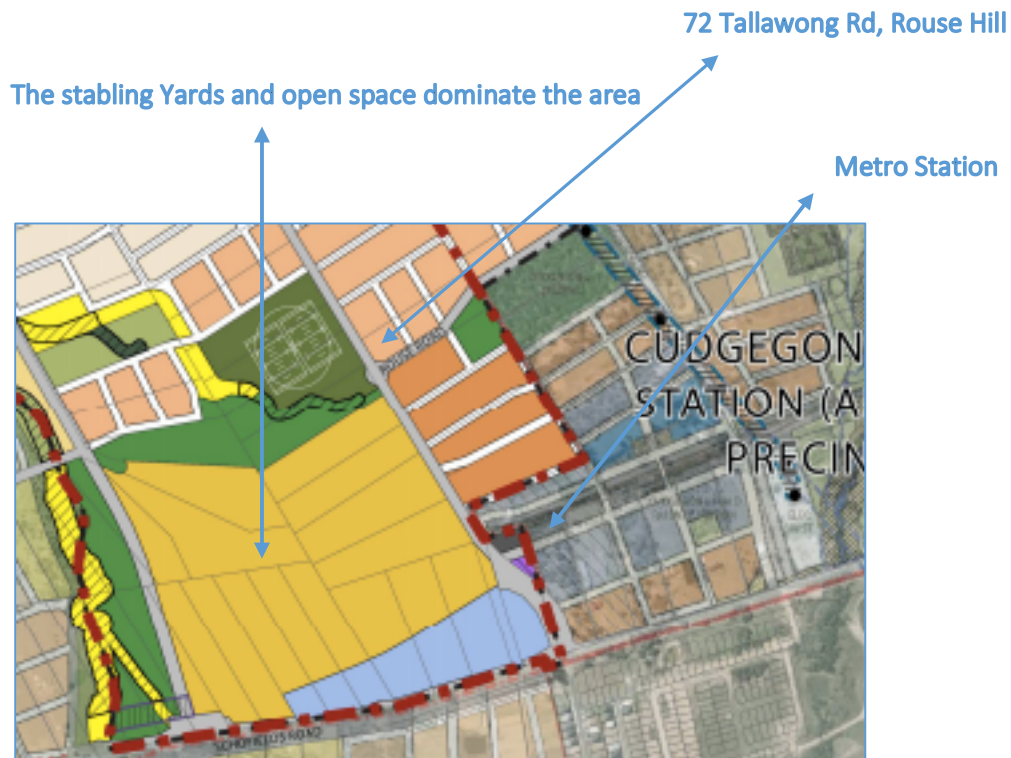


Figure Six below: Propose Suburbs

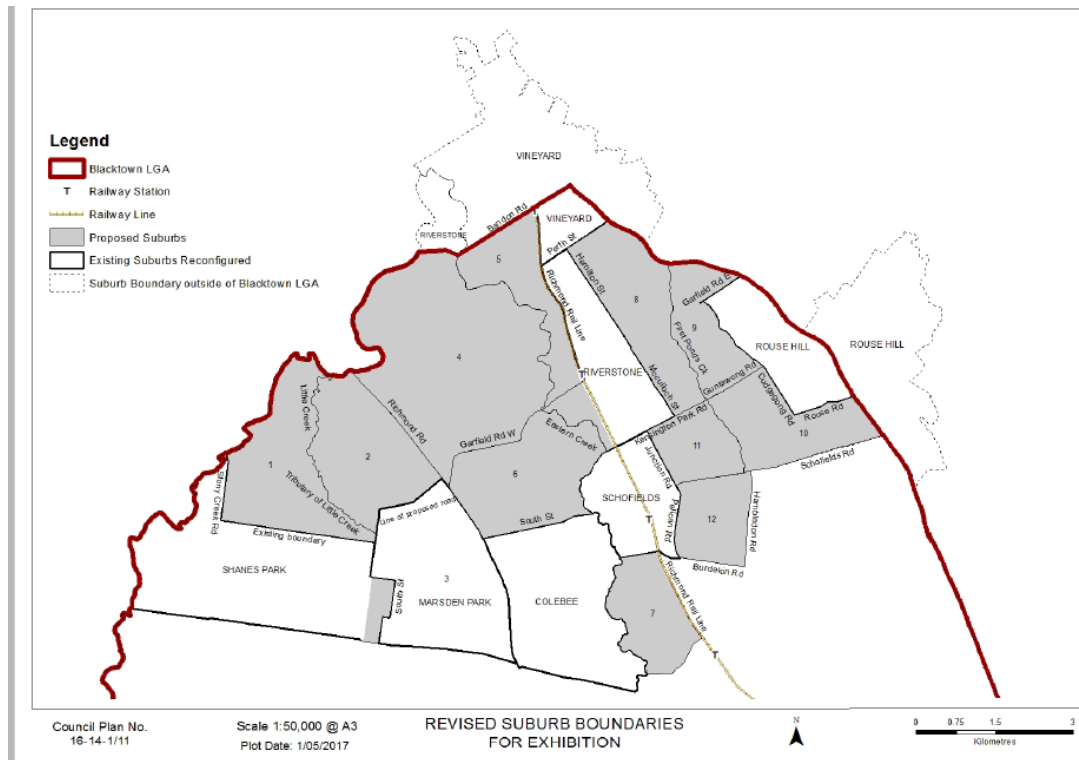


Figure Seven and Eight below – Cudgong Road Structure plan identifies the site as suitable for medium density development

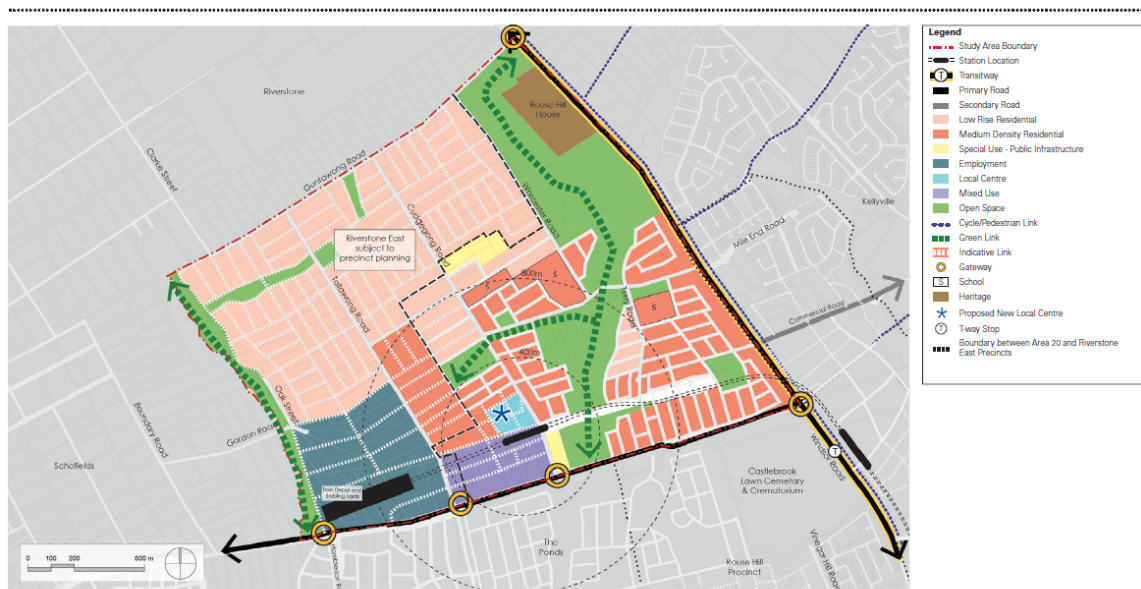


Figure 18: Structure Plan for the Cudgong Road Study Area



Medium Density Apartment Living

Objectives: To provide for the housing needs of a growing community and to provide a variety of housing types within close proximity of the station and associated uses.

Character: It is anticipated that this precinct could accommodate multi-dwelling housing only where the site is an appropriate size to deliver a high level of amenity for the existing and future residents. This could comprise of 3-6 storey apartment buildings, carefully master planned around communal open spaces and incorporating landscaped setbacks to existing streetscapes.



Figure 25: Proposed Location of Medium Density Apartment Living



Areas Expected to Remain Unchanged

Within the Study Area there are areas and sites which are expected to remain largely unchanged through the delivery of the NWRL and the Structure Plan.

This is due to a number of factors including existing uses, varying degrees of constraints, connectivity, accessibility and market demand.



Figure 26: Areas Expected to Remain Unchanged

Figure Nine – North West Metro Station between Cudgegong and Tallawong Roads

Cudgegong Road Station

Cudgegong Road Station is located in a cutting, open to the sky, but about six metres below street level.

The station is parallel to Schofields Road between Cudgegong Road and Tallawong Road. It has:

- 1000 commuter car parking spaces
- 6 spaces for buses
- 15 kiss-and-ride spaces
- 9 taxi spaces
- Parking and storage for bicycles.

Figure TEN below – the site is free from constraints - Source- *Riverstone East Land Use and Infrastructure Delivery Plan* Page 7..

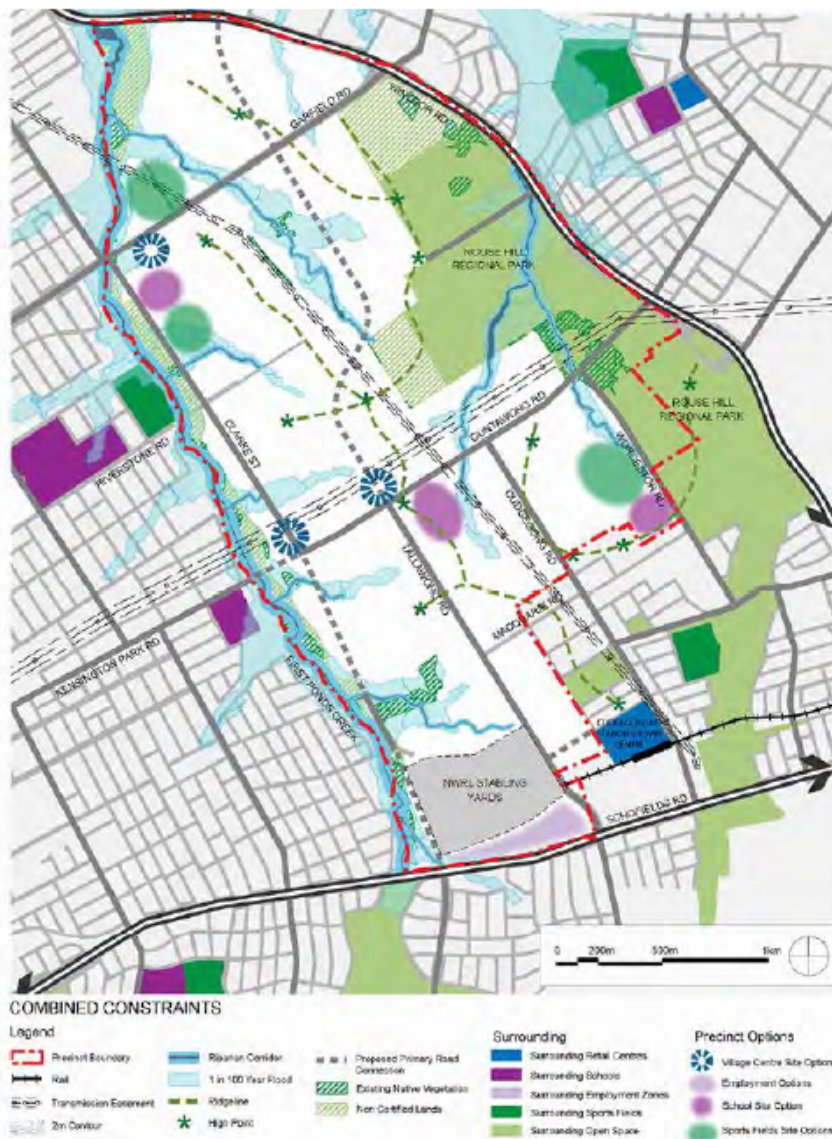


Figure 5 Site Constraints and Opportunities (Discussion Paper, June 2014)

In addition to the submissions already made, it is also clear that the technical studies and exhibited documents highlight the fact that a decision to impose a maximum density cap to the subject site of only 35 dwellings per hectare, would result in poor planning outcomes for the community. A review of these reports show that the proposal currently exhibited, is not evidence-based.

The technical studies and exhibited documents in fact, provide support for increasing the density at the subject site as a priority, due to the benefits of transit-oriented development. It is noted that there is an increasing appetite for apartments close to amenities and transport. Transit-Oriented development is noted to achieve positive economic, social and environmental outcomes for future communities. The technical studies encourage higher densities at locations closed to major rail and transport networks, such as 72 Tallawong Rd, to ensure the benefits of investing billions into transport is brought to fruition.

For example, the *NWGC Housing Market Needs Analysis*, points out there is already an increased demand for apartments close to train stations, which will be further driven by the completion of the Northwest Metro. One of the most salient points made by this expert study, commissioned by the Department of Planning, is the acknowledgement that **sites located close to train stations ought to be the logical priority for increased density:**

- “A great place to live with communities that are strong, healthy and well connected. A structural change in market preference and demand certainly **supports a case for a review and increase of current residential density levels, those precincts already benefiting from keen market interest and those focused around train stations are logical priorities for denser residential product.**” (Page 57)
- “An increasing dominance by units/flats and apartments is observed and this is **particularly notable around train stations and major transport nodes...** Key implications for housing demand are those of choice and affordability. It is therefore unsurprising that new buildings approvals indicate **a distinct shift in residential typologies away from separate houses to smaller and denser forms of dwellings.**” (Page 26)
- “Multi-unit living is perceived to be associated with a low maintenance and convenience lifestyle that is **accessible to a range of amenity and entertainment options.** Acknowledging that many people are drawn to multi-unit living for these lifestyle reasons, equally important are the issues of choice and affordability... Notwithstanding the factors of affordability and choice, **the completion of the NWRL is likely to also drive demand for smaller dwelling types,** attracting a different buyer profile (e.g. single and couple person households and those with no children) who would otherwise be attracted to separate/ detached housing in the NWGC...” (Page 33)
- “In the high growth scenario, an additional 77,868 dwellings are projected to be demanded by 2036. This exceeds the assessed market capacity (37,586 dwellings) and even the current theoretical capacity of 63,224 dwellings in NWGC. In all precincts, there is an argument for increasing permissible densities, not only to address market demand but to optimise services availability given that not all zoned land will be developed.” (Page 57)

Priority Growth Areas: North West Growth Centre (NWGC) Housing Market Needs Analysis; Department of Planning & Environment, Final Draft last saved 07/02/2017 – Esther Cheong, AEC Group ; Pages - 57,26,33,57.

The technical study – relating to Integrated Transport and Land Use Planning places a strong emphasis on transit-oriented development. This study was commissioned by the NSW Department of Planning and Environment and the Department of Transport and is referred to as:

North West Priority Growth Area Structure Plan Review, Exhibition Draft Report - Integrated Transport + Land Use Planning; Department of Planning and Environment; Department of Transport; Jacobs; November 2016.

This technical study underscores the important role Rouse Hill will play in Sydney’s future, as it is a connecting point for major transport corridors (rail and road networks) by linking the Northwest Metro train line to the existing CityRail Network. The technical study stresses the importance of aligning development to maximize investment in transport to gain economic, social and environmental benefits for communities. This in turn provides further support for increasing density at the subject site at Rouse Hill located only 400 metres from the new Metro station and Schofields Rd.

Key examples of the study that support the subject site being zoned to a higher density:

- “Refinement of the current Structure Plan should look for opportunities to **boost residential densities** along the chosen route corridors (Schofields Road and Garfield Road) and **around proposed rail station locations (Cudgegong Road, Schofields, Riverstone and Marsden Park)**. This will support the transit service and encourage trips by public transport rather than private vehicle. (Page 40)
- **“Concentration of higher densities in corridors and centres least constrained by topography and most accessible to primary transport (road and transit).”** (Page 41)
- “SMN (Sydney Metro Northwest) will have a station located near Schofields Road between Cudgegong Road and Tallawong Road. SMN will connect NWPGA with key employment centres along the Global Economic Corridor including Rouse Hill, Norwest, Macquarie Park, Chatswood, and eventually St Leonards and Sydney CBD, by providing high frequency services with two- to three-minute headways using high capacity single deck services. The estimated travel time from Cudgegong Road to Chatswood will be in the order of 37 minutes, providing faster and more direct services for residents within the NWPGA. A rapid transit corridor defined by the Sydney Metro Northwest (SMN) through the centre of the NWPGA will respond to emerging nodes within the centre and adjoining areas. It will be a catalyst to accommodate future network infrastructure and in the longer term, rapid transit services will provide an additional, more powerful attractor for transit users as well as stimulating further development.” (Page 50)
- “The NWPGA will be an area of intense development growth over the next 30 years and is one of two priority growth areas identified in A Plan for Growing Sydney. The 2011 population within the NWPGA is approximately 29,000 persons. At full development the population in the NWPGA is expected to increase to approximately 260,000. While existing infrastructure will in some way serve this growth, improvement and expansion of the transport network will be required to effectively serve the access and mobility needs of this emerging area. **The key to managing this growth will be through a highly compact and connected urban, land use and transport framework focused at precincts and serviced by an integrated land use and transport system.**” (Page 74)
- “Achieve urban consolidation by promoting higher intensity land uses while simultaneously improving local amenity and viability of the local community.”
- “Focus on customers using public Transport;
A key objective of the public transport network serving the NWPGA is to provide access for more people, more efficiently, on the available transport corridors. This reduces impacts on the traffic network, which is far less efficient in carrying high volumes of people within a constrained corridor. The key to achieving the required mode share to public transport is to understand and respond to the needs and expectations of the people that will (potentially) choose to use the public transport network. **This is a critical shift in thinking about transport planning: every decision and consideration needs to focus on the aim of attracting people to use public transport.**” (Page 86)
- “Providing transport supportive land use and urban form ;
The relationship between development patterns within the NWPGA and transit is the **idea of proximity to transit. This is really the same issue as density, but viewed from the customer’s point of view.** Cervero’s findings in his paper “Ridership Impacts of Transit Focussed Development” (1993) are summarised below:
 - **Residents living near rail stations are 5 times more likely to commute by rail.**
 - **Employees working near rail stations are 2.7 times more likely to commute by rail.”** (Page 87)
- “Increase density around transport Infrastructure;
NWPGA offers excellent physical dimensions for transit-oriented development, or development in such a way that can effectively and efficiently provide access by public transport. Increasing the amount of employment and density around the transport network in the early years will bring a range of economic benefits to operators of the bus network (including the North-West Transitway) and the SMN. By providing a larger patronage catchment, it will be more viable to run transit at higher levels of service.

This is critical to instill sustainable travel behaviour to, from and within the NWPGA, as well as promote transit oriented urban form within and around key centres.

It is crucial that residential densities are increased around transit infrastructure particularly at Schofields, Marsden Park and Riverstone because:

- It will result in a higher mode share to public transport, and a commensurate reduction in car use and dependence (and the range of associated economic, environmental and social impacts).
 - It will increase the viability and vitality of the commercial interests and community infrastructure in the study area.
 - It will improve the sustainability of the NWPG.” (Page 88)
- “Key strategic transport corridors and desire lines that have been identified include
 - Penrith to Rouse Hill via Marsden Park;
 - Rouse Hill to Castle Hill;
 - Parramatta to Rouse Hill;
 - Rouse Hill to WSA via WSPGA; and
 - Blacktown to Richmond via Marsden Park.” (Page 89)
 - “Travel behaviour – general travel behaviour of communities can best be influenced when they initially move to an area. If viable non-car based travel opportunities (transit, bike, walking) are available at the time of arrival to NWPGA, it is more likely that the community will make use of such opportunities.” (Page 91)

It is also very important to note that the proposal to cap the density on the subject site to only 35 dwellings per hectare is at odds with the stated objective of the Implementation plan. The listed intention of the *North West Priority Growth Area - North West Land Use and Infrastructure Implementation Plan May 2017*, (the Implementation Plan), is to update the planning framework since the release of the *North West Growth Centre Structure Plan 2006* (the Structure Plan):

“It identifies the opportunities for future urban growth and recommends a planning pathway to realise the area’s potential. The Implementation Plan also builds on the framework set in the *draft West and West Central District Plans* released by the Greater Sydney Commission in late 2016.” (Page 3)

Stated Objectives for the North West Priority Growth Area include:

- To plan for an increased population in Sydney’s North West in vibrant and liveable neighbourhoods.
- To balance the needs of a growing population with opportunities for employment and recreation
- Improve transport accessibility and connectivity throughout the area
- To facilitate the delivery of infrastructure that will support housing and employment growth
- Identify and enhance key biodiversity areas, open spaces, riparian corridors and culturally sensitive areas
- Explore new land uses along major infrastructure corridors to maximize public investment in infrastructure

The proposed zoning cap of a maximum 35 dwellings per hectare does little to realise the area’s potential and does not deliver on the stated objectives quoted above.

The site should have its density increased significantly, to at least the “Z” zoning (up to 100 dwellings per hectare) if not more, in order to deliver on the above objectives such as creating vibrant liveable areas that are well connected, with improved transport and connectivity. Doing so would result in the

area's potential being realised, in particular maximizing the positive returns possible from the significant public investment in the North West Metro train line.

The need to for residential developments to support housing for greater numbers of people was recognised by the report "**Councils zone out on new housing**"; dated 26 Nov 2016, published by the Property Council of Australia and JBA:

"The strategic vision encapsulated in the District Plans is a positive contribution to Sydney's future, but if we're not seeing leadership from councils and the district plans do not translate to action– then it will all be for nothing...We need residential developments that provide housing for a greater number people – if not, prices will continue to rise, targets will slip and the dream of home ownership will be dashed for thousands of people...The districts we looked at have received millions of dollars dedicated to major infrastructure, yet we are not seeing councils leading zoning to provide for major residential development to locate houses and people within easy access to this infrastructure...New home construction is crucial to the state's economic fortunes as it underpins growth, jobs and affordability, Zoned Out shows us that councils are not taking up the challenge of meeting the demands of a growing population and without better strategic planning, the community will suffer."

Summary of factors supporting increased density at 72 Tallawong Rd, Rouse Hill (in addition to those already listed) include:

1. Close proximity – 400 metres to the new North West Metro Station.
The site is in a desirable location being in a close proximity of 400 metres (five minute walk) to the Northwest Metro Rail Link train station currently under construction between Tallawong and Cudgegong Rds. It is therefore also placed in close proximity to associated amenities such as a planned retail precinct. The decision to change planning controls to reduce the number of homes on the site makes no planning sense.
2. Link to wider Sydney - It has been confirmed that the station between Tallawong Rd and Cudgegong Rd will link to the Sydney Metro by 2024 creating a direct link to the CBD in under 50 minutes. The NSW Department of Transport has also secured a corridor of land to likely link the station to the existing City-Rail network at Schofield's train station. As such the location will have easy access to the CBD (via two separate connections), the Hills area, Northwest, Greater West, South West and beyond which will make it a desirable place to live and fuel demand for increased density.
3. The Government's stated objectives through multiple planning policies to deliver better Transit Oriented Development demands that the site be zoned at a much higher density than the proposed maximum of 25-35 dwellings per hectare.
4. Close proximity to open space - The site is located next to parks, such as Cudgegong Reserve, and the proposed sporting fields are across the road to East of the site. This makes it a suitable area for higher density development.
5. There is already very limited capacity for residential development in areas adjacent to the site at Riverstone East, due to the Tallawong Rd Stabling Yards. Therefore, there won't be an overcrowding issue at this specific site if the density is increased.
6. The site is free from all building constraints and is ready to be developed.
7. It is a largely vacant land and is a "greenfield" development sites to be preferred over the wasteful exercise of bull-dozing existing suburban developments as is proposed to take place along other Northwest Metro stations.

8. The failure to increase zoning at the site would create negative effects on housing affordability by not providing for sufficient dwellings to be released and in particular apartments. It is noted that the technical studies show there is clearly a greater demand for apartments (within walking distance of train stations and parks). This is against the government's stated desired outcomes.
9. The failure to increase zoning at the site would create a poor outcome by failing to deliver a range of housing options where it is most likely to be in demand.
10. The studies on exhibit, don't provide support for the changes proposed by the department of planning. There is no justification in the government investing billions in the Northwest metro train line, only for the Department of Planning to propose changes that will significantly reduce the number of homes available in such close proximity to the station. The proposed changes to planning controls for the site, would prevent the area from meeting its full potential through missed opportunities to maximize social, economic and environmental advantages of transit oriented development such as reduced reliance on private cars, increased connectivity for a greater share of residents, meeting demand for affordable denser housing options and failure to promote fast-uptake of the new metro line.
11. The proposed planning changes to limit the density to 35 dwellings per hectare, would not meet the expectations of the general public.
12. The exhibited changes to the site, are not in the public interest and fail to achieve the desired outcomes for the North West Growth areas as espoused in various statutory planning documents such as the Implementation Plan, *A Plan for Growing Sydney*, *The State Environmental Planning Policies*, S117 directions, *Long Term Transport Master Plan and Rebuilding NSW - State Infrastructure Strategy 2014*, reports published by the Greater Sydney Commission including "A draft amendment to update a Plan for Growing Sydney - *Towards our Greater Sydney 2056* – Published November 2016 – Greater Sydney Commission; the *North West Rail Link Corridor Strategy for Cudgegong Station* released in 2013 etc...
13. There is an undeniable common theme that housing density should be prioritised in areas where there has been an investment in transport such as close to the Metro train stations.
14. One of the intended actions of the implementation plan is to deliver more dwellings. The proposed amendment to planning controls that impose a density cap of 35 dwellings per hectare, is completely inconsistent with this stated objective. The only way to achieve this objective is to increase the density
15. There is no justification for the sizeable inconsistencies in the proposed maximum densities (limits to the number of dwellings allowable per hectare, height limits etc) for R3 zoned land in Area 20 and Riverstone East sites, being proposed. The areas both being in Rouse Hill and in close proximity to the new train station. The variance of a limit of up to 100 dwellings as opposed to a maximum of 35 dwellings per hectare is not justified.
16. The Blacktown council is currently displaying proposals to name ten new suburbs in the Northwest Growth Area. It is of note that Riverstone East and Area 20 will be part of one brand-new suburb named either, a) Tallawong; b) Cudgegong Heights or c) Whitlam Heights. This highlights the fact that the proposed vast differences in zoning in are 20 and Riverstone East make no sense. They are currently part of the same suburb (Rouse Hill) and in future will be part of the same suburb. The distinction between Are a20 and Riverstone East is purely arbitrary.
17. If the department of planning is concerned with over-development in areas of the northwest priority area, it ought to address that concern meaningfully by targeting strategies to address areas of excess density that do not possess areas of close proximity to transit or other amenities.
18. The proposed changes are too wide-ranging and not well thought out. It is not in the public interest and against good faith to zone land inappropriately in areas of high amenity such as the subject site, due to to over development taking place in other areas.

19. It seems strange to zone areas with maximum density caps, if developments have already been approved on those sites that exceed the proposed density caps. In the interests of transparency, and in order to act in good faith, this should be recognized on planning maps or the information ought to be made publicly available via published documents
20. Planning outcomes should not be compromised by any possible differences in “bargaining power” of developers and original landowners. Example developers who now own properties in areas that were released prior to the subject site, such as those in Area 20, as opposed to original landowners in Riverstone East should not be given preferential treatment. The best way to manage this is with consistent decision making.
21. The public interest and the interest of the future community should be paramount. This is best achieved through consistency in planning decisions.
22. It is clear that the best outcome for the community is for the whole parcel of land to be zone R3 with a range of permissible housing density of at least 100 dwellings per hectare in order to maximize the development potential (remove the zoning for road and park).
23. The proposal to allow higher densities in area 20 than those proposed in Riverstone East is arbitrary.
24. The people of Sydney deserve better than planning in high amenity areas close to public transport and open space such as this site, to simply be an after-thought.
25. This is particularly pertinent having regard to the housing shortage within Sydney driving the prices of properties to unaffordable levels for many young working Australians. As well as the fact that transport in North Western Sydney could be greatly improved upon with better access to the North West Metro rail line.
26. SEPP 65 already provides a framework for consistent apartment design policy throughout the state. The new proposed changes add yet another layer of planning controls in Northwest Sydney. It doesn't make sense to propose new and different rules to the rest of Sydney. SEPP 65 confirms the importance of providing apartments close to public transport and existing services which as per the department's website "...reduces car usage, pollution and congestion, and increases the potential for residents to walk to and use public transport with the associated health benefits; and it encourages a more consistent approach to design across the state, more certainty for councils, architects and applicants, and design innovation. It doesn't make sense to limit density to only 35 dwellings per hectare.
27. The exhibited changes to the site are not evidence-based as they are at odds with the recommendations found in the exhibited technical studies and contradict the objectives and recommendations of the statutory framework that ought to be underpinning planning including the Implementation Plan itself.
28. Rather than a density cap being imposed, the zoning should remain a “range” of at least a maximum of 100 dwellings per hectare in order to allow the flexibility to maximize the potential of the site to deliver positive returns on the public investment in the North West Metro line.

Given the location of the site including its close proximity to the new metro station, the site should have its density increased significantly to a range, rather than a cap of at least the “Z” zoning (up to 100 dwellings per hectare) if not more. This will allow the site to deliver on the objectives of creating vibrant liveable communities that are well connected, with improved transport and connectivity. Doing so would result in the area's potential being realised, in particular maximizing the positive returns possible from the public investment in the North West Metro train line.

It simply doesn't make planning sense to limit potential future development to 35 dwellings per hectare.

We hope that full consideration will be given to these submissions. We welcome discussions with the department.

-End-