

The Secretary  
The Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Attention: The Secretary

### West Schofields Precinct Exhibition – 14 Durham Road, Schofields

Reference is made to the public exhibition of changes to the West Schofields Precinct Plan. This submission is made on behalf of Lidia De Lutiis, owner of 14 Durham Road, Schofields. Objection is raised to the location of a leg of the proposed collector road through the subject site, as the location of the proposed collector road leads to an inefficient subdivision pattern, requiring numerous land swaps to implement, and this site is forced to carry the burden of the road, which will also benefit adjoining properties.

Furthermore, the residential development on the site will be subject to onerous requirements for flood resilience as the majority of the site lies below the extent of the Probable Maximum Flood. Due to the low chance of incidence for events over the ARI 100 year flood event (the long-held planning standard in New South Wales), the degree of affectation for sites such as this are excessive and will make development more onerous and less attractive.

There is still no certainty in respect of the overall levels of the Special Infrastructure Charge and any proposed development contribution charges under s. 7.11 of the Environmental Planning and Assessment Act. This creates significant risk for the estimation of development yield and financial viability of development as landowners and developers are being requested to commit to a land use outcome without knowing the full financial implications of this decision. Overall, the draft planning controls proposed represent a significant diminution of the development potential of the subject site, seriously affecting its viability for residential subdivision.

### 1 SUBJECT SITE

The subject site is known as 14 Durham Road, Schofields being Lot 35 in DP 12076. The site is proposed to be zoned to R2 – Low Density Residential under the draft *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* Land Zoning Map for West Schofields.

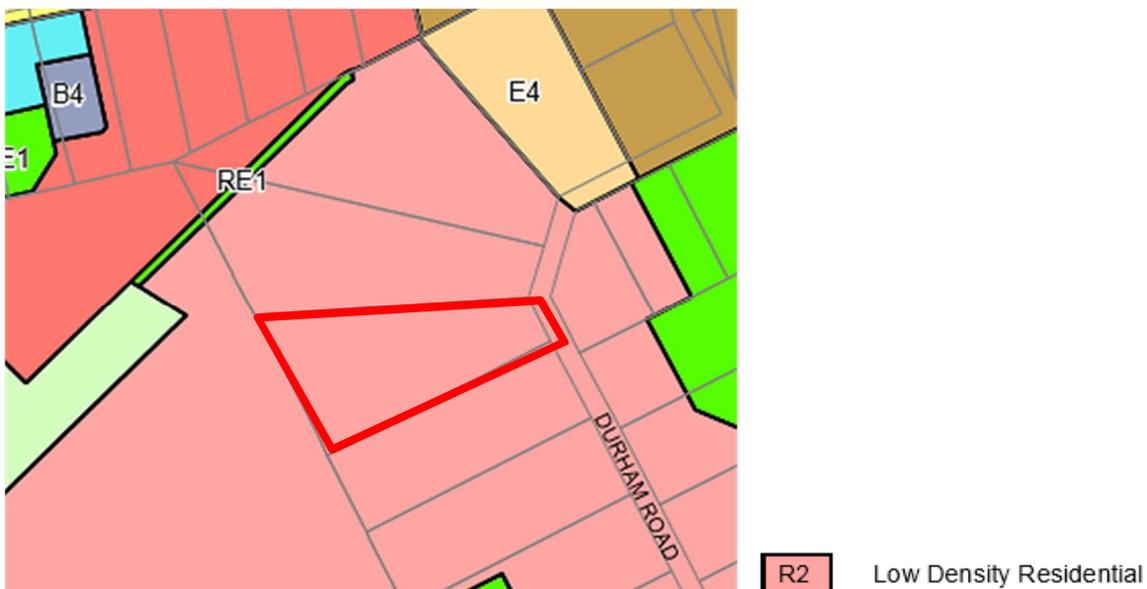


Figure 1: Extract from Draft West Schofields Zoning Map (Source – SEPP (SRGC) 2006)

## 2 WEST SCHOFIELDS PRECINCT PLAN

The Draft West Schofields Precinct Indicative Layout Plan implies major changes in the land use controls which will affect the overall subject site as shown in Figure 2.

### Collector Road

The Draft Indicative Layout Plan proposes one collector road and two local roads, these roads all intersect through majority of our clients land. This causes significant constraints such as:

- Irregular shaped lots
- Lessened potential residential development
- Decreased number of lots

Figure 15 of proposed Schedule 9 of the DCP shows a cross section for the Collector Road as being a total of 22m wide. This contradicts the Typical Collector Road cross section in the existing DCP (being Figure 3.11) which is only 20m wide.

We recommend that the Collector Road section width of 20m is adopted as per the existing DCP to retain consistency across all precinct releases. The 20m reserve maintains the functional use intended for this road status while limited life cycle cost impacts for the local council.

We also recommend that the Collector Road alignment be moved to the existing Durham Road as it is already a constructed 20m wide road corridor, rather than reconstructing this and another Collector Road in an alternate location. The collector road link through 14 Durham Road is not required for flood evacuation purposes, having a similar level of flood immunity to Durham Road itself and excessively burdens this lot.

The location of the proposed collector road leads to an inefficient subdivision pattern, requiring numerous land swaps to implement, and this site is forced to carry the burden of the road, which will also benefit adjoining properties. The precinct as a whole appear to be over-provisioned with collector roads and there appears to be scope to rationalise the collector road network to provide a more efficient overall development outcome for the landowners.

Furthermore, the current proposed arrangement results in a 'dog leg' arrangement from Angus Road, which may introduce a safety issue for vehicles making right hand turns in and out of the new collector road with regards to sight distances and the encouragement to speed.



Figure 2: Draft West Schofields Precinct Indicative Layout Plan (Source – NSW Department of Planning)

### Flooding

The subject site is mapped as being located below the Probable Maximum Flood level for the Eastern Creek catchment. As such it is subject to onerous requirements for flood resilience, by way of 'wet flood proofing' the property. The additional costs to be incurred by the stringent building controls ('wet flood proofing') proposed will add to the overall building cost, impacting housing affordability. This is a significant extension of flood planning controls in New South Wales, where the ARI 100 year flood level has long been the accepted standard for restriction of development for flood purposes, as stated in the New South Wales Flood Manual.

This control is likely to add significant cost to construction as well as lessening the attractiveness of the land for sale, by burdening it with additional requirements. We are concerned that this is unduly restrictive, given the low frequency of the events that may adversely affect properties that lie between the ARI 100 year and PMF flood levels. This is especially the case where the controls apply to lands that are located above the ARI 500 year flood line and the PMF flood level, where the probabilities that these controls will need to be called upon within the lifetime of any future dwelling houses would be very small.

### 3 RECOMMENDATION

Our client's first preference would be to delete the road altogether as a collector road and utilise Durham Road as a Collector road at 20 metres wide.

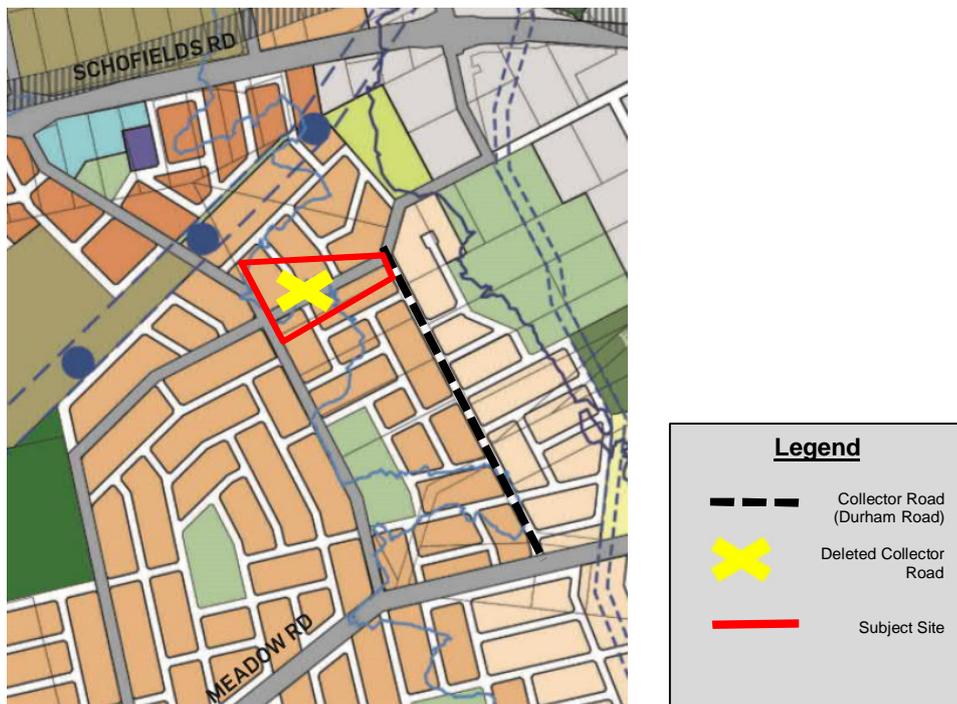


Figure 2: Draft West Schofields Precinct Indicative Layout Plan (Source – NSW Department of Planning)

#### 3.1 Alternative Option

Should it not be possible to remove the identified collector road entirely, we recommend an alternative route for the relocation of the proposed collector road as outlined in black in Figure 3 below. The alternative route for the collector road will join via the proposed road from the eastern direction through to the road in the western direction. This route will minimise the impact on the overall site, whilst only effecting the northern boundary. The collector road reserve width should be reduced to 20 metres for consistency with the adopted collector road widths elsewhere in the Blacktown City Council urban release areas.



Figure 3: Alternative Collector Road Example (Source – NSW Department of Planning)

#### 4 SUMMARY

1. Proposed that the collector road be deleted as Durham Road can perform this function.
2. We propose that should a collector road be maintained, within the West Schofields Precinct would be relocated towards the northern boundary of the subject site.

Deletion of the collector road will enable a more efficient development outcome on the subject land and surrounding properties. Alternative access exists for local residents to access the centre via the local road network.

The recommended route will provide linkage through the proposed roads and onto Schofields Road and Meadow Road, Schofields. This alternative route for the collector road will:

- Create regular shaped lots
- Increased potential residential development
- Increased number of lots
- Create better road connectivity

The proposed alignment of the collector road through the property does not facilitate efficient development of the subject land. The positioning of the road will result in lots of excessive depth on the southern side, and significant land swaps will be required with the adjacent property to facilitate frontage development. Note that having the collector solely on this lot is an excessive burden on this lot relative to those surrounding.

Residential development on the site will be subject to onerous requirements for flood resilience as the entire site lies below the extent of the Probable Maximum Flood. Due to the low chance of incidence for events over the ARI 100 year flood event (the long-held planning standard in New South Wales), the degree of affectation for sites such as this are excessive and will make development more onerous and less attractive. We request this requirement be removed.

There is still no certainty in respect of the overall levels of the Special Infrastructure Charge and any proposed development contribution charges under s. 7.11 of the Environmental Planning and Assessment Act. This creates significant risk for the estimation of development yield and financial viability of development as landowners and developers are being requested to commit to a land use outcome without knowing the full financial implications of this decision. We request that the plan not be finalised until the full extent of contributions is known.

If you have any further questions, please do not hesitate to contact me at Calibre Group on (02) 8808 5000 or alternatively via email on [Tom.Foster@calibregroup.com](mailto:Tom.Foster@calibregroup.com).

A handwritten signature in black ink, appearing to read "Tom Foster", written in a cursive style.

Tom Foster  
**Senior Town Planner**  
**Calibre Professional Services**