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WEST SCHOFIELDS PRECINCT PLAN

This submission has been prepared for CSR Limited (CSR) as developer of part of the land within the West Schofields Precinct of the North West Priority Growth Area. It addresses issues relating to the exhibited draft West Schofields Precinct Plan. The purpose of the submission is to ensure that the next and more detailed stage of land use planning reflects the ownership and opportunity that CSR can contribute to the future residential area of West Schofields. CSR thank the Department of Planning and Environment (DPE) for the preparation and exhibition of the draft Precinct Plan and look forward to working closely to provide an outcome appropriate for the area.

CSR own and operate the PGH Bricks and Pavers facility at West Schofield and own a number of adjacent properties for total landholdings of some 87.9ha. It is CSR's intention at the closure of the facility to redevelop the area for the purpose of residential subdivision, consistent with the desires of the DPE.

To enable the efficient and most appropriate outcome for the site, CSR have identified a variety of concerns with the exhibited draft Precinct Plan, exhibited maps and the Indicative Layout Plan (ILP). This submission addresses the proposed ILP as it affects the landholdings of CSR only.

Key issues identified during this review include:

- Treatment of the Jemena gas easement;
- Road alignments straddling lot boundaries and land ownership;
- Provision of open space and sports field alignments;
- Orientation of residential blocks;
- Dwelling densities; and
- Proposed flood controls for residential development within the draft Blacktown City Council Growth Centre Precincts Development Control Plan Schedule 9 West Schofields (DCP).

This submission is supported by a revised Indicative Layout Plan prepared by Sitis Urban Design at **Attachment 1**.

1.0 Key Issues and Recommendations

We note the information placed on exhibition for the West Schofields Precinct. The following issues have been identified and recommended changes to the ILP and exhibited maps are provided. Refinements to the layout and land use of the precinct are recommended, to optimise yield and residential amenity as well as facilitate more timely delivery of development and infrastructure.

1.1 Gas Easement

As identified on the draft ILP the Jemena gas easement traverses through the eastern side of the precinct. Currently it passes through land proposed to be zoned as R2 Low Density Residential, shown on the ILP as within a future residential footprint. This would introduce restrictions on future landowners of any residential allotments in this location through the imposition of an easement and also introduces the issue of access for Jemena to maintain the pipeline.

It is proposed to provide the easement as publicly accessible open space with an area of approximately 1.56ha. This would provide a green corridor through the site, separating the sporting fields and providing opportunity for higher density lots to front a green space. Access would also be maintained for Jemena for maintenance purposes, removing the need to access the easement through residential properties.

1.2 Road Alignments

The draft ILP shows general alignments for future roads, including collector roads through the West Schofields Precinct. Currently the proposed road alignments straddle property boundaries in various locations. This introduces delivery constraints on timeframes for provision of the infrastructure.

The proposed north-south collector road that straddles the eastern boundary of the CSR land is recommended to be contained fully within the CSR landholdings. This will enable upfront delivery of the road by CSR (at the time of site redevelopment) and remove any reliance on neighbouring landowners to deliver access to the area. Additionally, the internal road layout has been reconfigured to provide a more efficient subdivision pattern and respond to amenity and solar access for future dwellings in this area.

1.3 Open Space and Sports Fields

The Demographic and Social Infrastructure Assessment by Hill PDA (forming part of the exhibited documentation) identifies that overall, 41.3ha of open space is required within the precinct, with four double playing fields (18ha), eight playgrounds, three tennis courts and four netball courts, with passive open space within 400m of all residents. The assessment identifies Blacktown Councils' current standards of provision for active and passive recreation of an overall provision of 2.83ha per 1,000 persons, with passive open space to be 400-500m from all residents. Playgrounds are to be provided at a rate of one per 1,750 people and within 500m of all residents, and sports fields (of at least 4.5ha) at a rate of one per 1,850 people.

The assessment indicates that the current draft ILP provides approximately 38.2ha of local open space and 70.8ha of playing fields which is considered sufficient to meet the needs of the future community in the West Schofields Precinct. It is also recognised that the West Schofields Precinct is providing additional open space above its requirements to make up a shortfall in other North West Growth Centre Precincts.

The draft ILP highlights several parks within the CSR land. In particular, three parks (and part of the proposed sports fields) are located on land owned by CSR and others. This will create delivery constraints due to anticipated timeframes for redevelopment. It is therefore proposed to relocate the parks to be located fully within CSR landholdings.

Additionally, two of the proposed parks (Parks 1 and 2) are located particularly close together and as such it is proposed to remove Park 2 (and use the land for residential development) and enlarge Park 1 while shifting it further east. The increase in area and reconfiguration of Park 3 also results in the retention of additional Cumberland Plain Woodland trees and clusters. This reconfiguration maintains access between parks of 400-500m with Park 5 (outside the CSR landholdings) proposed for retention. This still maintains the quantum of park land within this area of the Precinct, and provides accessibility to the parks in accordance with Blacktown Council's Recreation Open Space Strategy which provides:

- All residents to be 400–500m walking distance from open space;

- Minimum park size of 0.3ha to ensure greater useability and viability;
- Minimum 2 appropriately sized street frontages, preferably 3; and
- That open space is integrated, connected and multi-functional.

Furthermore, the draft Open Space for Recreation Guide prepared by the Government Architect states that 0.5ha is the minimum area for open space in greenfield areas, with a flexible shape, boundary of not less than 20m and a minimum of 50% road frontage. Depending on the age group of children using the space, there are recommended requirements for kick-about areas including a 40m by 60m space for this purpose. Shading in the order of at least 50% is also required through either natural or built shade.



Figure 1 The existing draft ILP provides a number of open space areas

Source: Department of Planning and Environment

The proposed removal of Park 2 allows for the reallocation of open space to other parks and the sports fields within the Precinct, and the relocation of Park 1 further east still provides for accessibility of all proposed residential areas to be within 400m of a proposed park. This does not result in a significant reduction in open space as outlined in **Table 1**. The change to the area of the sports fields in the eastern part of the site will allow for a more coherent arrangement and remove the transition land as proposed by the current ILP. Additionally, the gas easement can be used as open space to ensure maintenance access for Jemena while allowing a green buffer to be provided.

Table 1 Parks and Open Space within the West Schofields Precinct

Land Use	Current ILP	Proposed ILP
Park 1	1.42ha	1.84ha
Park 2	1.76ha	0ha
Park 3	1.67ha	1.95ha
Sports Fields	6.63ha	8.49ha

Land Use	Current ILP	Proposed ILP
Gas easement	0ha	0.98ha
Total	11.48ha	12.28ha*

Note: areas are estimates only

** Does not include the gas easement*

The proposed Park 1 and 3 achieve the general requirements for size, street frontage, location and accessibility. Council identify that playgrounds are to be provided at suitable walking distances within 500m, and fitness stations within an approximate one to 1.5km radius in residential areas. The proposed parks are sized appropriately to cater for these facilities.

The recommended changes to open space within the subject area of the precinct have the following benefits:

- the reconfiguration results in a like for like provision of open space areas;
- the proposed open space areas exceed the recommended minimum size of 0.3ha and are greater than the 0.5ha recommended by the Government Architect;
- the location ensures an even distribution of open space within 400m of all residents;
- the new and regularised shape of Park 1 allows CSR to provide surrounding lot orientations more suited to solar access, and the potential for; and
 - new built form typologies fronting the built form around the park with high amenity; and
 - provision of passive surveillance opportunities.
- the position of Park 2 provides for the appearance of a larger open space area to act as a gateway to the golf course.

Additionally, it is proposed to relocate the sports fields further south with the playing fields situated fully within the CSR landholdings. Presently the draft ILP shows the sports fields situated over numerous lots, with the southern part of the CSR land being proposed as RU6 Rural Transition (which prohibits dwelling houses). Shifting the fields into this area would regularise the delivery of the recreational area by one landowner, and the quantum of open space remains constant due to the intended removal of Park 2 (per above).

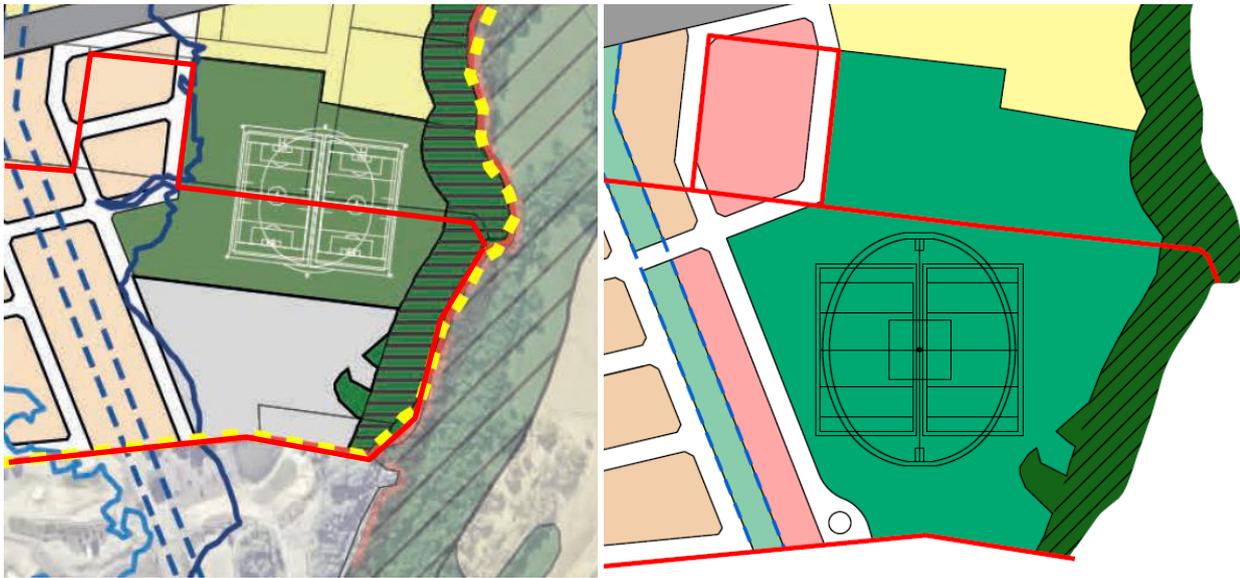


Figure 2 The existing sports field location and the proposed sports field location (CSR land outlined in red)

Source: Department of Planning and Environment, *Sitios Urban Design*

1.4 Block Orientation

The current draft ILP proposes a mix of development blocks oriented north-south and east-west. Greater amenity and solar access for future residential dwellings in the area would benefit from re-alignment of several blocks to a north-south orientation.

As such, it is recommended per the attached proposed ILP changes to reconfigure several development blocks to provide better solar access benefits for future dwellings. This will limit the design development required at a dwelling stage and provide for efficient approval processes, reducing the need for further assessment of solar access.

1.5 Dwelling Density

The exhibited Residential Density Map indicates three bands of density for the precinct:

- 15 to 20 dwellings per hectare;
- 15 to 25 dwellings per hectare; and
- 25 to 35 dwellings per hectare.

It is the intention of CSR to develop a medium density product fronting the sports fields (and backing onto the proposed open space corridor afforded by the gas easement) in the south-east corner of the precinct. Currently this area is subject to a dwelling density of 15 to 20 dwellings per hectare. CSR consider this should be increased to 15 to 25 dwellings per hectare due to the availability of open space and amenity for future dwellings.

Medium density development can include typologies such as townhouses and villas and is often used to frame open space and parks. The provision of higher density along the proposed road fronting the western boundary of the sporting fields will ensure surveillance across the fields but also provide a higher amenity for residents

Review of the draft DCP highlights in Section 4.1 that land zoned R2 Low Density Residential will have a density band of 15 to 20 dwellings per hectare on land between the 1 in 100-year flood level and the PMF. This would imply that the PMF is the reasoning behind the lower density band adjacent to the sporting fields.

The area intended to have a 15 to 25 dwellings per hectare density band directly adjacent to the sports fields is not subject to flood impacts under a 1 in 100-year flood event per the Flooding, Water Cycle Management and Riparian Corridor Assessment. As such, it is considered that a higher density band in this location (combined with a change in the land use zoning from R2 to R3 Medium Density Residential) can be achieved and would result in a greater urban design outcome along the frontage to the sporting fields.

1.6 Flood Management Development Controls

Section 6.2 of the exhibited draft DCP requires residential development between the 1 in 100-year flood level and the Probably Maximum Flood (PMF) to meet the controls outlined in the “Reducing Vulnerability of Buildings to Flood Damage – Guidance on Buildings in Flood Prone Areas” (Hawkesbury-Nepean Floodplain Management Strategy Steering Committee, June 2006), known as the ‘Blue Book’. This is a significant change from historical flood management which has generally accepted the 1 in 100-year flood event as the standard for development. There is a significant portion of the CSR land within the affected area of the draft ILP.

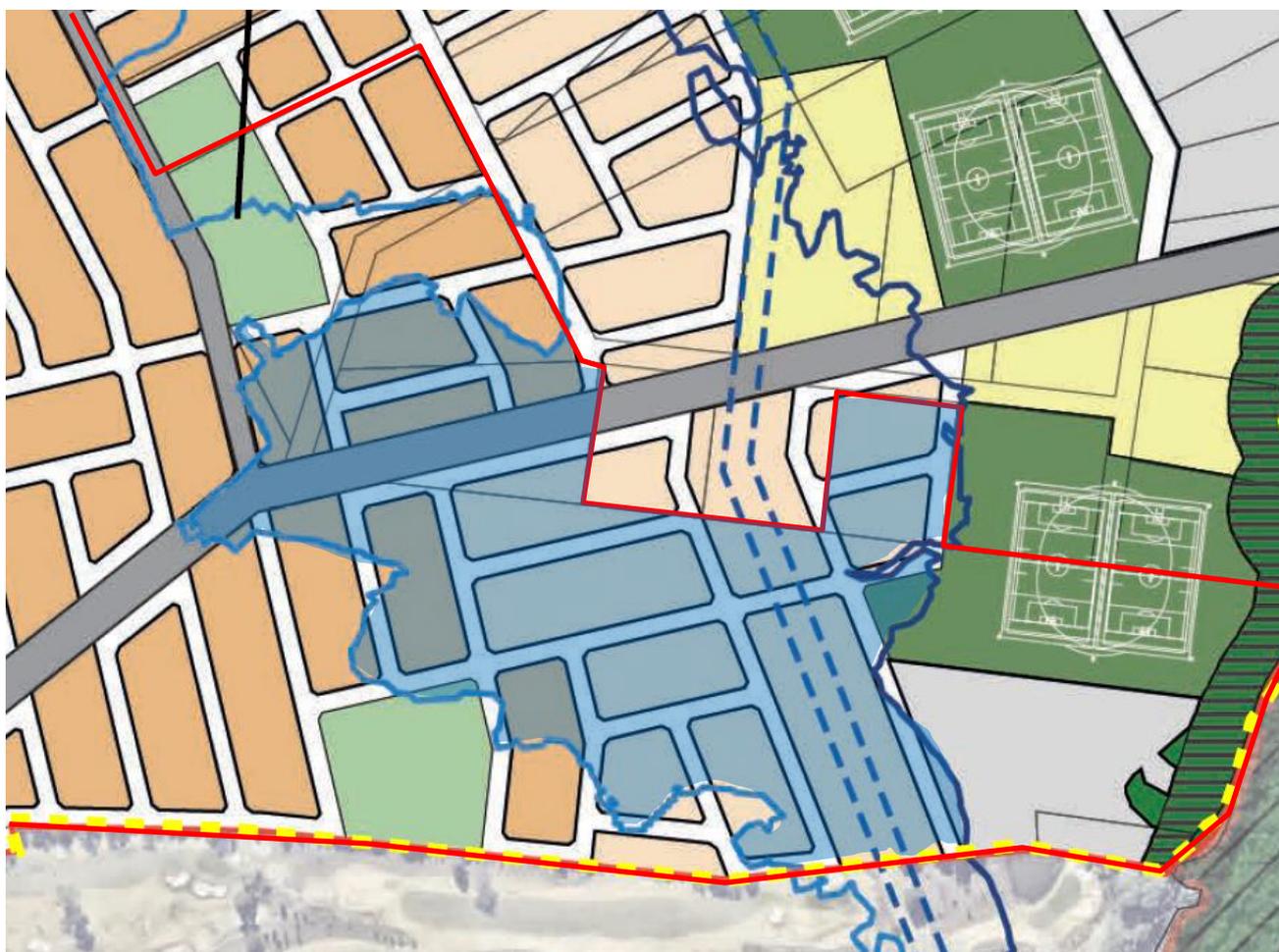


Figure 3 A large area to the west of the sports fields on CSR land are affected by the draft DCP controls

Source: Department of Planning and Environment

For a dwelling to be constructed to achieve a ‘wet flood proofing’ principle requires construction materials and techniques to be implemented to allow water to intentionally enter and leave a building. This will add substantial cost to the construction of new dwellings, and impact housing affordability.

The Blue Book identifies a range of factors that can be applied to assist dwellings during times of flood, including building orientation, built form and dwelling typology. The draft DCP controls specifically identify that Section 4.3

Construction Materials of the Blue Book apply and compliance must be achieved. The requirements within Section 4.3 to manage flood impacts are significantly costlier in terms of materials and construction techniques. The Blue Book also identifies that higher density products including multi-unit development can provide greater flood benefits as they can:

- Allow dwellings to be located above the PMF, resulting in garages and common property at ground level;
- Be specifically designed to resist flowing water forces through stronger construction; and
- Provide a refuge for residents unable to evacuate in time.

The proposed DCP control will likely result in individual residential allotments located between the 1 in 100-year flood event and PMF level being less attractive to potential purchases due to the increased construction costs and imposition of flood controls.

It is considered that this control is restrictive on the land due to the low occurrence rates of such flood events that may impact the affected properties between the 1 in 100 year and PMF flood levels. The flood mapping completed by Calibre in the Flooding, Water Cycle Management and Riparian Corridor Assessment (exhibited with the draft Precinct Plan) indicates that under developed conditions the site is generally not impacted by a 1 in 100-year flood event, and the imposition of restrictive controls is considered unnecessary.

Furthermore, the Flood Evacuation Study completed by Stantec iterates that it is not possible to provide complete protection against a PMF event, both physically and economically. That study identifies that the available shortest evacuation time for the West Schofields Precinct in a 1 in 5000-year flood event is five hours. Recommended design principles for the precinct include:

- Increasing the elevation of perimeter roads;
- Maintain a rising road nature for regional evacuation routes across the future transport corridor;
- Arterial roads above the PMF should be straightened to increase traffic flow; and
- Develop roads to at least the 1 in 100-year flood planning level flood immunity level (including 0.5m freeboard).

It is considered that these broader precinct design principles are better suited to managing flood impacts for the area rather than the application of dwelling specific design controls, with evacuation the appropriate mitigation measure.

The imposition of the proposed DCP flood controls has the potential of severely limiting development within that area of the CSR site between the 1 in 100 year and PMF flood level. Cumulative impacts of Special Infrastructure Contributions, Section 7.11 contributions and the additional construction costs required by the draft controls impose challenges for the delivery of affordability of housing. It is recommended that these controls be removed.

It is also unclear what impact the proposed flood management controls would have regarding approval pathways and whether future dwelling approvals could still utilise complying development, noting that complying development cannot be carried out on a flood control lot without a flood engineer certifying the land. This may introduce additional assessment requirements for Council and cost and delay for housing delivery.

The proposed flood controls within the draft DCP will significantly impact housing affordability, which is inconsistent with Objective 11 of the Greater Sydney Region Plan that seeks to provide more diverse and affordable housing. Increasing construction costs will affect the ability for families to purchase a detached home. Importantly, the Housing Market Analysis by Macroplan Dimasi (exhibited with the draft Precinct Plan) identifies that housing growth in the area needs to consider diversity to accommodate the need for families. The provision of more affordable semi-detached products for families who cannot afford a detached home will be restricted due to the increased build costs under the proposed flood controls. Provision of medium density housing within the area is likely to provide more affordable outcomes, particularly in terms of a two-storey and above product which can assist in providing flood management outcomes as described in the Blue Book (per the above).

2.0 Recommendations

In summary, the proposed changes and recommendations to the exhibited draft Precinct Plan for the West Schofields Precinct include:

- Changes to the alignment of development blocks and roads within the CSR landholdings for better solar amenity and delivery of roads;
- Reconfiguration and relocation of open spaces including the number of parks and the use of the gas easement as an open space corridor;
- Shifting of the sporting fields to be fully contained within the CSR land;
- Introduction of medium density fronting the sporting fields; and
- Removal of the proposed DCP flood controls.

The above recommendations will require changes to the exhibited draft plans, specifically the:

- Indicative Layout Plan
- Land Zoning Map;
- Height of Buildings Map;
- Residential Density Map; and
- Land Reservation Acquisition Map.

Yours sincerely,



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