

Your ref: SSD 9063
File no: MC-18-00001

6 December 2018

Key Site Assessment
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Luisa Maguire

Dear Ms Maguire,

Re: SSD 9063 - Tallawong Station Precinct South (formerly known as Cudgegong Road Station South) - 69-79 Schofields Road, Rouse Hill

Thank you for your correspondence dated 8 November 2018 forwarding the Response to Submissions (RtS) and inviting us to provide further comments on the State Significant Development lodged under Part 4 of the *Environmental Planning and Assessment Act 1979* ("the Act") for the above proposal.

The RtS were discussed with the proponents – Landcom at a meeting on 14 November 2018. Based on the discussion at the meeting and the comments provided by our officers, we still maintain our strong objections to some key aspects of the proposal as outlined in Attachment A. We request these matters to be addressed in amended details and referred back to Council for reconsideration and to enable conditions to be formulated for your inclusion in any final consent granted.

If you would like to discuss this matter further, please contact Mr Shakeeb Mushtaq on 9839 6053.

Yours faithfully,



Judith Portelli
Manager Development Assessment

ATTACHMENT A

Matters to be considered and addressed:

Recreation Planning and Design

The following comments were provided by the Recreational Planning and Design section:

- a) The proposal intends to accommodate far more additional people on this site than originally forecast by the Precinct Planning. Adopting the North West Growth Centre and Department of Planning and Environment open space provision rates, 2.83 ha is required for every 1,000 people.
- b) The Applicant, Landcom, is therefore requested to provide additional open space off site or a financial contribution to address the shortfall of open space generated by this significant proposal.
- c) This requirement is consistent with that placed on all developers, public and private, to which they comply. It would be unfortunate for Landcom not to comply with a standard condition that private developers are required to comply with and provide a lesser standard of open space provision for the significant development which will ultimately be on-sold to private developers to do the development. .
- d) Further, we have presented Landcom (Ms Kerrie Symonds) with achievable solutions where Landcom can provide the shortfall of open space less than 200 m away from the subject site as part of a Landcom development that is in its schematic stage – a development that arranges open space, drainage land and a proposed school site.

Access and Traffic Management

The following comments were provided by the Traffic section:

- a) Development should provide on-site parking for residents as well as their visitors as per the SEPP 65 requirement i.e. RMS subregional parking rate be used to determine parking numbers. We do not support using parking rates from different councils.
- b) We do not accept on-street parking to be attributed to a development as suggested in the post exhibition traffic report. This sets a serious precedent and any such street parking will also be used by commuters parking near the station.
- c) Council policy is not to have trees on the carriageway, therefore no tree on the carriageway is supported.
- d) All public roads must meet Blacktown Growth Centre DCP requirements for road reservation and carriageway width. In this instance, minimum 18m wide roads are required.
- e) The applicant has modified the 18m wide road specification in the DCP in a manner that is not acceptable to Council

Waste Management

The waste management information is inadequate and so the applicant must:

- a) provide a waste management plan for the ongoing management for each residential site (1A, 1B, 2A, 2B, 2C, 2D and 2E) and commercial/retail site within the proposed development:
 - proposed waste management features for the site
 - proposed truck size to service the site
 - number of stages, buildings and number of units in each
 - provision of a caged bulky waste storage area for each building (and its size)
 - physical treatment of the loading bays to prevent unauthorised parking
 - waste and recycling generation rates, bin capacities and collection frequencies
 - collection point and associated access for collection vehicles
 - provision of chutes on each residential floor and 240L recycling bins adjacent
 - method to move bins from the chute discharge points to the collection points
 - resident access to waste rooms, bulky items storage and chute discharge points
 - use of a building manager to coordinate ongoing management:
 - access to loading bay for collection trucks
 - the bulky waste storage area (including access)
 - the waste facilities onsite including cleaning of bins and waste rooms etc.
- b) Satisfy Council that all waste collection is to be within the basement area and a minimum 4.5 clearance is required for the waste collection area within the basement.

Open Space Infrastructure – Landscaping and Street Trees

The following comments are provided:

- a) Street trees in roads or parking bays is not acceptable.
- b) Water Element – greater detail required, water play area would not be acceptable.
- c) Seating wall requires skateboard deterrent and possibly too much sandstone seating.
- d) Swale grade preferably 1:6 grade with a 1.5 – 2m wide base of the swale.
- e) Incorporate the use of councils park furniture suite including shelters.
- f) No kiosk on RE1 land
- g) Eucalyptus and Corymbia species are not acceptable as street trees at the present time possible alternatives, Angophora floribunda, Angophora costata, Syncarpia glomulifera.

- h) No *Fraxinus griffithii* as street trees, alternatives *Fraxinus pennsylvanica* 'Urbanite' or 'Cimmaron.'
- i) Root barrier on kerb and path side of tree pits.
- j) Porous paving finish on street trees and plaza plantings no mulch in these areas.
- k) No steel edging on tree pits that adjoin turf areas.
- l) Page 5 of landscape plan has unacceptable species *Sapium*, *Jacarandas* and *Eucalyptus* species, street tree species on page 18 are acceptable but *Fraxinus oxycarpa* 'Raywoodii' can only be used in plaza plantings not as a street tree species.

Development Planning Issues

1. The applicant must comply with the car parking requirements in SEPP 65 which calls up the RMS requirements due to proximity of the site to a railway station as outlined in the traffic comments above.
2. The applicant must comply with the open space requirements as outlined in the open space comments above.
3. Failure by the applicant to these 2 key aspects will result in:
 - this development being an overdevelopment of the sites;
 - it set a serious precedent to other developers in the North West Growth Centre also seek variations to minimum parking and open space requirements just to fit in more development;
 - further, as the development concept approval is going to be sold to one or more private developers, they will become aware of the departures granted and will use this as a catalyst to do the same elsewhere; and
 - finally, failure by Landcom to comply with these basic principles means that they will increase the residential density on land even higher than the current controls permit which is contrary to the recent draft SEPP amendment by the Department of Planning and Environment to reduce densities in these areas.

Other Matters

1. The applicant is to comply with Growth Centre Precincts Development Control Plan, including for road design and widths.
2. The applicant is to submit a Stage 2 Contamination Report with testing to ANZECC Guidelines and the preparation of a Remediation Action Plan.
3. The applicant is to ensure the site can be validated to National Environmental Protection Measures 2013 to Residential 'A' standards by an EPA accredited Site Auditor.