



12 December 2018

Paula Bizimis and Annie Leung  
Key Sites Assessments  
NSW Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Paula and Annie

**SSDA 9063 - Tallawong Station Precinct South - Mixed-use development (formerly known as Cudgegong Road Station Precinct South)**

I refer to the proposed Tallawong Station Precinct South development at 75-81 Schofields Road, 38 Cudgegong Road, Rouse Hill, and Blacktown City Council's (BCC) submission dated 23 November 2018.

Please find Landcom and Sydney Metro's response to the issues raised by Council at Attachment A.

The Tallawong Station Precinct South Concept Proposal supports best practice transit-oriented design, providing increased residential density in immediate proximity of the new Tallawong Station. It provides a public park that is larger than required by the applicable Development Control Plan (DCP), and satisfies the requirements of the Growth Centres SEPP and the Rouse Hill Contributions Plan for the provision of open space.

Landcom requests that in any determination, conditions of consent be imposed to require that monetary contributions be paid in accordance with the requirements of the current Rouse Hill Contribution Plan and North West Special Infrastructure Contribution plan.

Should you require any additional information, or wish to discuss the proposal, please do not hesitate to contact me on 0459 834 788.

Yours sincerely,

A handwritten signature in black ink, appearing to read "David Schofield", written over a horizontal line.

**David Schofield**  
Development Director

## ATTACHMENT A

### Recreation Planning and Design

*The following comments were provided in the Recreation 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.*

**Response:**

- The proposal complies with the floor space ratio development standard, providing a floor space ratio of 1.33:1, less than the development standard of 1.75:1.

The proposal does have minor exceedances to the height standard to accommodate retail and commercial floor to ceiling heights, provide flexibility for future uses and due to the sloping site. The buildings never exceed eight storeys, which is the intention of the height standard.

As the proposal generally complies with these standards the floorspace as proposed and the resulting future population should have been expected at the time the site was rezoned.

- The 2.83 ha of open space for every 1000 people cited by Council's submission is a strategic planning benchmark.

It is not a statutory planning control or development standard and it is inappropriate to apply this at development application stage. Such a benchmark is appropriate only for strategic planning processes.

Provision of the monetary contributions in accordance with the Rouse Hill Contributions Plan will assist Council in providing open space beyond the site.

- 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.*

**Response:**

The Rouse Hill Contributions Plans 22L and 22W apply to the site, and contributions will be payable in accordance with the requirements of the plan, which includes an apportionment for the provision of land and works for open space. As the contributions plans are based on dwelling provision the monetary contribution is directly proportional to the level of development on the site.

- 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.*

**Response:**

The proposed location and size of open space in the Tallawong Station Precinct South development is appropriately consistent with the Area 20 Precinct Indicative Layout Plan, the Growth Centres SEPP, the DCP, the North West Growth Area Special Infrastructure Contribution framework, the Rouse Hill Contributions Plans 22L and 22W, and the planning framework established by legislation.

- 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.*

**Response:**

Landcom and Sydney Metro have responded to requests for additional open space by increasing the size of the park on the subject site. This park now exceeds the size requirements of the DCP. Being located within 200m of all site residents the park size and location satisfies relevant SEPP and DCP requirements for the provision of open space.

## **Access and Traffic Management**

*The following comments were provided in the Access and Traffic Management 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.*

**Response:**

Tallawong Station will have metro rail services every four minutes in the peak, which exceeds the level of service at most railway and light rail stations.

Because of the high frequency of metro services, and the proximity of the station within 300m of every resident, it is appropriate to also reduce parking provision to reflect the improved accessibility and connectivity.

More information on the reasons and appropriateness of reduced car parking provision is provided at section 5.2.3 of the Response to Submissions.

- 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.*

**Response:**

Off-street and visitor car parking will be provided for retail, commercial and residential uses. The level of car parking provided is considered appropriate given the principles of transit-oriented development, the proximity of the development to the station and the high frequency metro services that will be provided to the residents of this area.

- c) *Council policy is not to have trees on the carriageway, therefore no tree on the carriageway is supported.*

**Response:**

The intention of locating the trees in the roadway is to provide improved amenity and increase the tree canopy. This issue can be resolved at detailed development application stage.

- 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.*

**Response:**

The proposal complies with the 18m width for roads.

In addition the street intersection radii have been modified directly in response to comments by Blacktown City Council's City Architect at a meeting on 29 January 2018. The City Architect considered that the street intersection radii were overly generous and requested that the proposal include radius similar to those found in City of Sydney, as this will be a town centre. This was included in the proposal as lodged.

- e) *The applicant has modified the 18m wide road specification in the DCP in a manner that is not acceptable to Council*

**Response:**

The modification of the road specification is intended to provide for a separated cycle / pedestrian access adjacent to the north-south road, consistent with the objective of achieving transit-oriented development. It was understood this approach was supported by Council's City Architect and Recreation Planning and Design Manager. Landcom and Sydney Metro request that this matter is resolved at detailed development application stage.

## **Waste Management**

*The following comments were provided in the Waste Management section:*

*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.*

**Response:**

These matters can be conditioned.

## **Open Space Infrastructure - Landscaping and Street Trees**

*The following comments were provided in the Open Space Infrastructure – Landscaping and Street Trees section:*

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 Cimmarron.'*
- 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.*

**Response:**

These matters can be conditioned. It is requested that the potential for a kiosk in the park be subject to further discussions at detailed development application stage.

## Development Planning Issues

*The following comments were provided in the Development Planning Issues section:*

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.*

**Response:**

Please see comments above at Access and Traffic Management.

2. *The applicant must comply with the open space requirements as outlined in the open space comments above.*

**Response:**

Please see comments above at Recreation Planning and Design.

3. *Failure by the applicant to these 2 key aspects will result in:*

- *this development being an overdevelopment of the sites;*

**Response:**

Please see comments above at Recreation Planning and Design.

- *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;*

**Response:**

Please see comments above at Recreation Planning and Design.

- *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*

**Response:**

The proposed car parking rates are considered appropriate given the proximity to the station and the level of accessibility and frequency of the transport service. This will exist in few other locations other than those areas immediately adjacent to metro stations.

- *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.*

**Response:**

Please see comments above at Recreation Planning and Design.

## **Other Matters**

*The following comments were provided in the Other Matters section:*

1. *The applicant is to comply with Growth Centre Precincts Development Control Plan, including for road design and widths.*

**Response:**

All roads generally comply with the Growth Centre Precincts DCP widths. Landcom and Sydney Metro request that the matter of the design of the north-south street with separated cycle and pedestrian paths be resolved at detailed development application stage.

As noted above the street intersection radii have been modified directly in response to comments by BCC's City Architect, in order to be more appropriate for a town centre.

2. *The applicant is to submit a Stage 2 Contamination Report with testing to ANZECC Guidelines and the preparation of a Remediation Action Plan.*

**Response:**

This can be conditioned and provided at detailed development application stage.

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.*

**Response:**

This can be conditioned and provided at detailed development application stage.