

30 May 2019

The Hills Shire Council
PO Box 7064
Norwest NSW 2153

Via online submission on the Hills Shire Council website

Public Exhibition - Planning Proposal for 55 Coonara Avenue, West Pennant Hills (1/2018/PLP)

Thank you for the opportunity to comment on the above planning proposal. It is understood that the land is currently zoned B7 Business Park under The Hills Local Environmental Plan 2012 and is proposed to be rezoned to permit medium and high density residential development for up to 600 dwellings.

Hornsby Shire Council and The Hills Shire Council have previously committed to work together with the State Government to ensure an appropriate vision was developed for the Cherrybrook Metro Station precinct. This is a sound approach. The spot rezoning of the subject site is inconsistent with a coordinated approach and is proposed in the absence of a precinct structure plan or strategy that addresses the orderly transition of land uses for the area surrounding the Metro Station.

Council has consistently made its position known to the State Government that a whole of precinct approach is critical to planning for the area. It is paramount that the interests and concerns of the present and future communities of both local government areas are considered in a comprehensive and transparent manner.

The proposal by Mirvac to redevelop the subject property for residential purposes is likely to trigger further owner/ developer-led spot rezoning applications in the area. This would lead to an ad hoc approach to land use planning for the Metro Station precinct. The process would undermine the planning framework for both councils and lead to poor outcomes for the Cherrybrook community.

The planning proposal has not sufficiently considered the opportunities and constraints presented by the subject site in the context of the wider precinct and the cumulative impacts associated with the proposed development as the land uses in the area around the Metro Station transition over time.

Specific concerns include:

1. The economic assessments by Urbis (May 2017), and HillPDA (April 2017, January 2016) argue that residential uses (as opposed to any other uses) are the most economically feasible. Given that residential property prices in metropolitan Sydney are consistently higher in value than that of non-residential, and also that higher density residential is greater in value than that of lower density residential, any land developed for higher density residential purposes will obviously attract a premium. However, the assessments provided by the consultants do not consider whether the subject site is best placed to support higher density residential uses (as opposed to other land parcels in the area) with respect to the opportunities and constraints of the larger precinct.
2. The cumulative assessment of traffic and transport impacts is not evident in the supporting materials provided by ARC Traffic + Transport (July 2017), Ason Group (December 2017), GTA Consultants (October 2018). The proposed redevelopment of the subject site cannot be treated in isolation of its wider surroundings. The potential for other land parcels within the precinct which are in proximity to

the Metro Station to redevelop similarly for medium and high density residential has not been considered by the traffic assessments. There needs to be a precinct-level understanding with respect to the cumulative impacts on local and regional infrastructure.

3. The Consolidated Urban Design Report (2018) has been developed in isolation. The analysis does not consider the relationship of subject site to larger precinct, or whether the proposed development is contextually appropriate. For example, the community title approach to the redevelopment of the site significantly isolates the proposed public facility (sporting field), which form part of the “public benefits” package to The Hills Shire Council. The location of the proposed facility is the furthest away from the existing established communities, and its placement is in the least accessible and least connected part of the development site. The facility proposed may become privatised due to lack of visibility and connectivity to the wider community and also by the proposed subdivision under the community title scheme for local roads which would impede permeability across the subject site.

In summary, Hornsby Shire Council does not support the planning proposal for the land located at 55 Coonara Avenue, West Pennant Hills. A whole of precinct approach provides certainty that growth and infrastructure issues are considered in an integrated way and that the capacity of the entire Metro precinct is identified at the strategic level, upfront and with a regional perspective.

A piecemeal approach prejudices the outcomes of an overall strategy for the whole Cherrybrook community. Hornsby Councillors have received a large volume of submissions from the community raising concerns with the proposal and there is a high level of community angst in regards to the uncertainty about planning for the area. As you may be aware, Council continues to request a commitment from the State Government for an integrated transport and land use plan to ensure that regional implications and capacity for future changes are considered.

Any decision for this site should be deferred until a precinct-wide structure plan or strategy is adopted for all the land parcels surrounding the Cherrybrook Metro Station.

Should you have any questions regarding this submission, please contact Ash Chand, Principal Strategic Planner, by phone [REDACTED] or email AChand@hornsby.nsw.gov.au.

Yours faithfully,



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