

30 April 2013

Strategic Assessments
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

By email: plan_comment@planning.nsw.gov.au

Dear Sir/Madam,

North West Rail Link Submission to Showground Station Draft Structure Plan

Introduction

This submission to the Showground Station Draft Structure Plan has been prepared on behalf of the following residents of Whitehaven Place, Castle Hill and specifically addresses the implications of proposed residential growth projections of the Structure Plan.

Whitehaven Place is a small court located off Parsonage Road, immediately adjacent and south-east of the Structure Plan study area.

NAME	ADDRESS	NUMBER OF YEARS AT ADDRESS
Dane and Kersten Philippe	1 Whitehaven Place	1 year
Bryan and Debbie Hynes	2 Whitehaven Place	18 years
Jacqueline Foley and Glenn Puckeridge	3 Whitehaven Place	20 years
John and Pam Edwards	4 Whitehaven Place	43 years
Charlie and Sarah Baylis	5 Whitehaven Place	2 years
Pat and Kate Gibbons	6 Whitehaven Place	10 years
Jeffrey and Sue Heath	7 Whitehaven Place	30 years
Hamed and Victoria Mustafa	8 Whitehaven Place	15 years

As evidenced above, the owners of Whitehaven Place are long term residents of this street and local community.

The residents of Whitehaven Place support the North-West Rail Project and the principle to facilitate transit oriented development around each of the new stations including Showground Station.

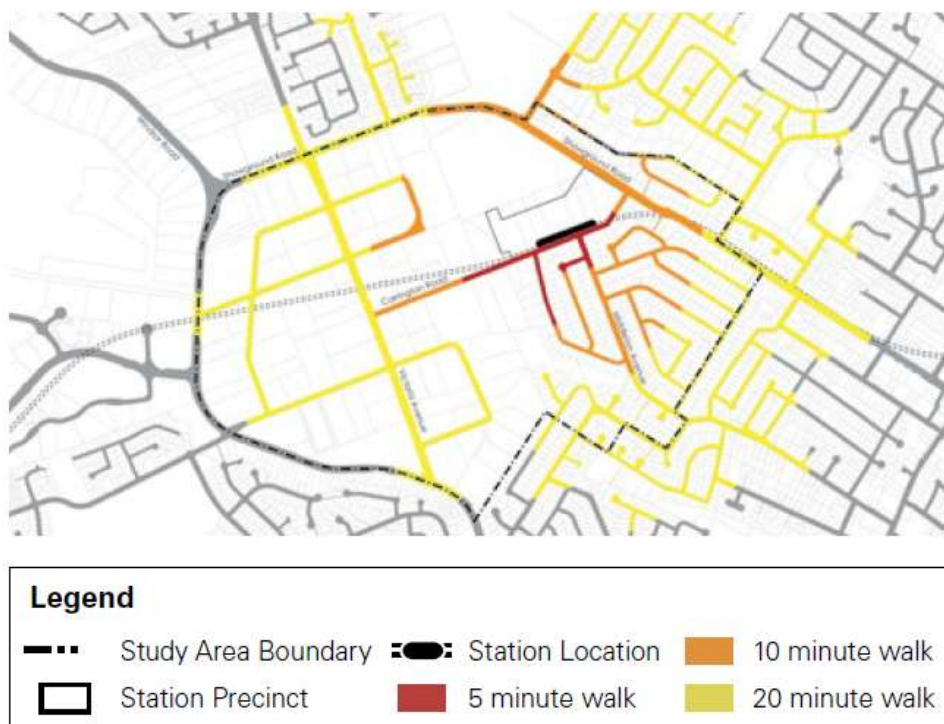
However, from our assessment, a number of issues should be addressed in finalising the draft Strategy that will assist in ensuring that the Strategy fulfils its stated aims and will not lead to adverse impacts on the surrounding community.

The key concerns being:

- The definition of the study area and extent of proposed medium density development;
- The assumptions on dwelling yield take up and the implications for the future character of the Structure Plan precinct.
- The timing and process for implementation of the Structure Plan.

Definition of Study Area

The Structure Plan explains the methodology of defining the Study area, which is substantially based around an 800 metre radius or approximate 10 minute walking time from the Town Centre. This is informed by the walking time analysis provided below.



Source: Showground Station Draft Structure Plan March 2013

This analysis demonstrates that in most cases the study area extends well beyond a 10 minute walking catchment particularly in locations to the south-west towards Whitehaven Place.

We consider that this catchment to be overly ambitious in terms of the concept of transport orientated development. The Structure Plan is advocating large apartment buildings of up to 6 storeys (with the expectation of lower vehicle ownership) but yet up to 15 minutes' walk from the Town Centre.

It is our submission that a far tighter study area should be adopted at this time having regard to the walkability of the catchment and the established character of this area.

For example, the proposed medium density townhouse living precinct as illustrated in the map below should be deleted from the study area for the reasons that:

- It is located outside of a walkable 800 metres to the Town Centre and well beyond a 10 minute walk.
- The townhouse precinct has no strategic value and bears little relevance to the Town Centre at this time and should only be considered well into the future when medium density is well entrenched immediately around the Town Centre.
- The future of this particular precinct should be determined in the future by the Hills Shire Council in accordance with its housing strategy.



Source: Figure 28 Showground Station Draft Structure Plan March 2013

Request No.1 – Delete the area identified in Figure 28 above from the Showground Station Structure Plan

Assumptions on Dwelling Yield & Implications for the Future Character of the Area

The Structure Plan document refers to a capacity and demand study, however this study does not form part of the exhibition package. As a result, it is not possible to review and qualify the key assumptions made in arriving at the projected residential growth proposed to be facilitated.

The Structure Plan does however indicate that a realisation rate of 53% for housing, which has been used to identify each development type and used in the projected growth calculations. According to the study, the realisation rate has been informed by *“the high level of amenity and quality of life afforded within the Study Area at present and the added accessibility delivered by the North-West Rail Link”*.

While we cannot specifically comment on the assumed realisation rate (without the benefit of reviewing the demand study), the following matters should be noted:

- The study area is substantially comprised of modern single dwelling sites, with few if any large “opportunity sites” immediately available without significant land consolidation.
- As noted in the report, the study area has high amenity and value and therefore the ability to transform this precinct into higher densities could be problematic in the short to medium term, without compromising this amenity and value.
- The study assumes a take up rate of 165 dwellings per annum, thereby realising dwelling growth of 3600 dwellings by 2036.
- This projection assumes growth over 21 years presumably commencing from 2015/16, however, as the North-West Rail is not projected to be operational until at least 2020, the growth projections assume that higher density development will commence in advance of the railway infrastructure. This is a matter of concern that is addressed further below.
- The study assumes that the majority of dwelling growth in the study area will be in the form of apartment buildings of 3-6 storeys. However, we have concerns with the logic of this approach when much of this growth is located some distance from the Town Centre (ie. beyond a 10 minute walking catchment).

In summary, we consider that the growth forecasts are ambitious. Of greater concern however are the implications of a potential medium to high residential precinct being spread across a large area intermixed with established low scale dwelling housing.

It is our submission that little or no consideration has been given to the consequences of a large precinct being “upzoned” to facilitate medium density development when the likely realisation rate given the constraints is only approximately 50%.

The logical outcome of this will be fragmented medium density development interspersed with single lot housing with the negative impact upon the character and amenity. The Pacific Highway/rail corridor on the upper North Shore of Sydney is a good example of increased dwelling density around transport infrastructure and the consequential impacts that can occur either on the interface of the precinct or between new and established development.

It is our submission that a more constrained precinct should be identified for medium to high density development (ie. 3-6 storey apartments) and initially established within an approximate 400 metre radius of the Town Centre. Such an approach would establish a more compact medium density precinct highly accessible to public transport and seek to avoid ‘piecemeal’ development over a larger area. In time this precinct could be widened subject to further review of dwelling demand and take up.

Request No.2 – Reduce the precinct identified for medium residential development to an area approximate to a 400 metre radius of the Town Centre.

Timing & Process for Implementation

Whilst it is intended that the North West Rail Line will promote changes in travel behaviour and decrease the reliance on private motor vehicle, the success of this shift is dependent upon the delivery of the project prior to significant redevelopment occurring. Significant residential development within the Study area prior to completion of the North West Rail Line will not reduce the current dependency on private vehicles. This in turn will place considerable pressure on the road network, not only with the study area, but the surrounding region.

Development which is dependent upon the road rather than the rail, even in the short term, would result in significant increases in traffic levels and has the potential to impact on local road networks and the operation of critical intersections. Again, this is likely to erode the amenity of the area for established residents.

Concern is also raised regarding the ability of State agencies to deliver required infrastructure and services in a timely and coordinated manner to supplement the projected dwelling and job numbers. In progressing the rezoning of areas for increased residential densities, the State Government must be satisfied that services and infrastructure will be provided to cater for increased demand.

Request No.3 –Rezoning of residential land should be timed to occur in line with the commencement of operation of the North West Railway.

While we acknowledge that detailed rezoning processes will need to occur to effect real change, we note the significance of getting the foundations of the Structure Plan right. As the Structure Plan document states on page 31:

“The Draft Structure Plans for the NWRL Station Precincts are to be considered at the strategic planning level, similar to that of the Subregional Strategies for Sydney. The Draft Structure Plans will inform, and be implemented through, appropriate zonings, amendments to built form controls and to guide the assessment of major projects and development applications within the Study Area.

There is no doubt that the adopted Structure Plans will establish a very clear framework for the future of these areas over a long period of time. It is submitted that there is not sufficient information and understanding of the long term implications provided to make informed decisions on the Structure Plans in their present form. Accordingly, decisions to adopt the Structure Plan should not be rushed without exhaustive community consultation and debate. Such an approach would align with the recent release of the NSW Government’s White Paper on planning reform and the emphasis on ‘upfront’ consultation on strategic planning.

Request No.4 – That further time be afforded to the community with further consultation to fully understand the implications of the Draft Structure Plan.

Conclusion

The residents of Whitehaven Place support the North-West Rail Project and the principle to facilitate transit oriented development around Showground Station. However, as outlined in this submission, there are a number of matters that should be further considered and the Structure Plan amended to reflect these concerns prior to adoption.

We thank you for your consideration of the matters raised in this submission and please do not hesitate to contact the undersigned with any questions arising.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'T. Blythe'.

Tim Blythe
Regional Director