



CP/DA
16049
26 February 2016

Ann-Maree Carruthers
Director Urban Renewal
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Ann-Maree,

**SUBMISSION IN RESPONSE TO THE SHOWGROUND STATION PRECINCT PROPOSAL
7-13 MIDDLETON AVENUE & 4-10 PARTRIDGE AVENUE CASTLE HILL**

We thank you for the opportunity to comment on the *Showground Station Precinct Proposal* (the Proposal).

This submission has been prepared by JBA on behalf of a landowners group that own 7-13 Middleton Avenue and 4-10 Partridge Avenue, Castle Hill (the site). It requests that as part of the Proposal, that the Department of Planning and Environment (DP&E) remove plans for a proposed new road that extends Fishburn Crescent between Partridge Avenue and Middleton Avenue, and as part of the removal of the road, DP&E extend the 2.7:1 FSR to encompass 10 Partridge Avenue and 13 Middleton Avenue, Castle Hill.

There are a number of compelling planning and urban design reasons to support the removal of the proposed new road between Middleton Avenue and Partridge Avenue:

- the extension of Fishburn Crescent between Middleton and Partridge Avenues is considered unnecessary to improve access and vehicular movement within the precinct;
- removal of proposed road will create an improved block dimension that will align with the predominant block structure within the precinct to facilitate greater dwelling growth and create a better design outcome for the site; and
- due to existing amalgamation arrangements, the proposed road will isolate 10 Partridge Avenue and 13 Middleton Avenue.

Furthermore, as part of the request to remove the proposed new road, it also requested that proposed the FSR of 2.7:1 is extended to encompass 10 Partridge Avenue and 13 Middleton Avenue for the following reasons:

- it is consistent with the built form principles for the Residential Apartment Sub-precinct;
- a consistent FSR should be applied across all areas proposed for a 27 metre height limit within the R4 High Density Residential zone; and
- it is a large site under the ownership of a landowners group with no constraints that will catalyse the renewal process within Showground Station Precinct.

On this basis, it is requested that the DP&E amend the Showground Station Precinct to remove plans for a proposed new road that extends Fishburn Crescent between Partridge Avenue and Middleton Avenue, and as part of the removal of the road, DP&E extend the 2.7:1 FSR to encompass 10 Partridge Avenue and 13 Middleton Avenue, Castle Hill.

1.0 THE SITE

The site is located on 7-13 Middleton Avenue and 4-10 Partridge Avenue, Castle Hill and is part of The Hills local government area. A key feature of the site is its significant site area and proximity to the new Showground Railway Station.

The site is owned by a consortium of landowners that have teamed together to create a development parcel. The site is currently of a low density residential character with detached housing as the primary built form within the area. The land has a slight slope declining to the west toward Cockayne Reserve. It does not contain any heritage listed items, nor is it within a heritage conservation area.

An aerial photo of the site is shown at **Figure 1**.

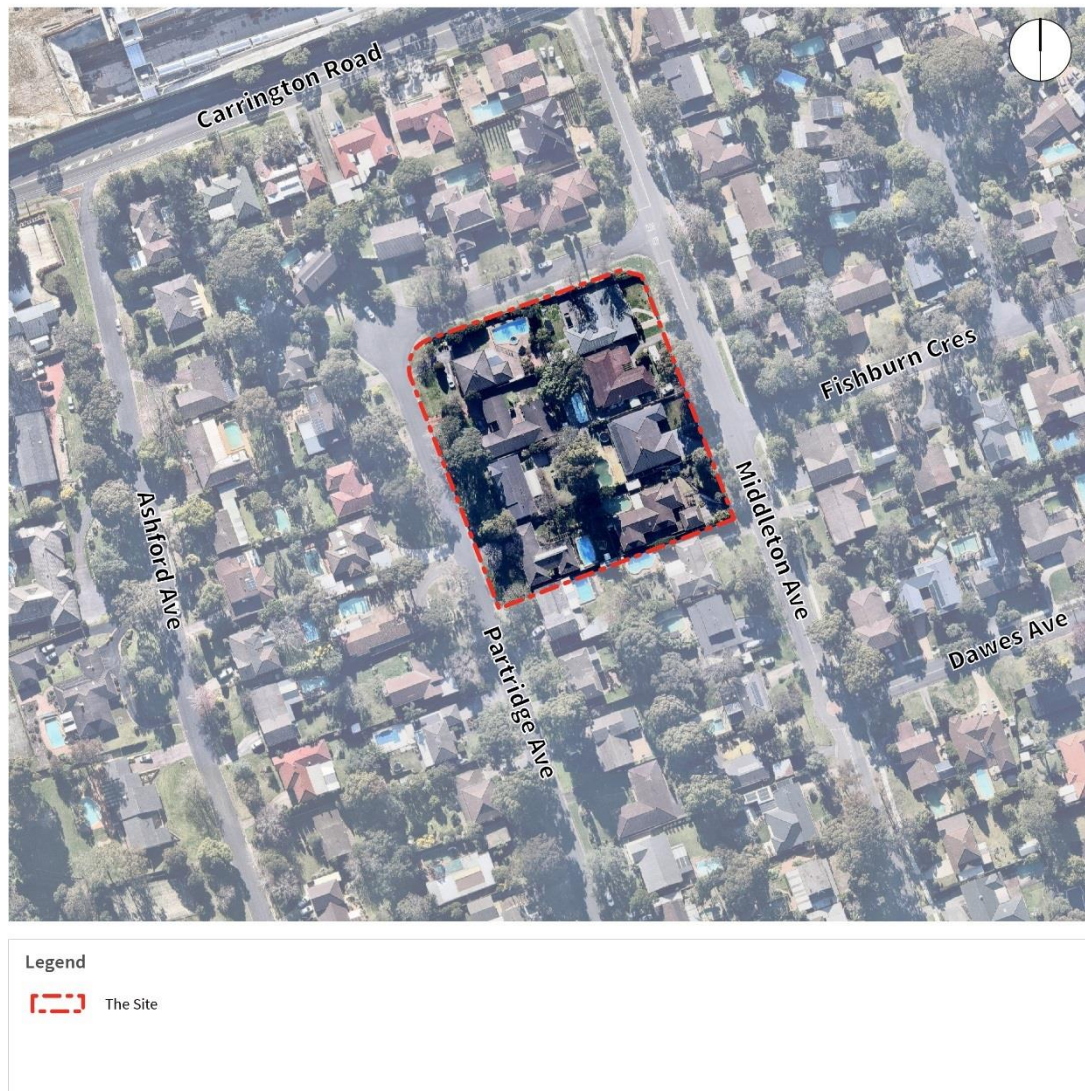


Figure 1 – The site is shown outlined in red.

2.0 STRATEGIC PLANING CONTEXT

Sydney is growing and changing. By 2031 Sydney's population is forecast to grow by an additional 1.6 million people. Along with this is the changing demographic profile of the population with an increase in number of older persons, lone person households and oversea migrants. This indicates that not only housing growth within Sydney needs to provide an additional 664,000 homes by 2031, but the type and location of the dwellings needs to support the increasing demand for smaller, well-located homes such as apartments close to facilities and transport.

New housing production within the Sydney and the Central Coast has grown over the last five years, with approximately 22,800 additional dwellings delivered in 2014. However, it still significantly lags behind the required dwellings per annum to achieve the additional 664,000 dwellings by 2031.

The NSW Government has responded to this challenge with the announcement of the North West Rail Link, a 23 kilometre line from Epping to Cudgegong Road that will connect with the second stage of the Sydney Metro linking the area to Sydney CBD and west to Bankstown. The North West Rail Link Corridor Strategy has prepared Structure Plans for each station along the NWRL to address the demand for growth within these areas and in conjunction with the delivery of the NWRL to structure an integrated transport and land use plan for the corridor. A new station proposed within the Showground Station Precinct, which forms part of the broader North West Rail Link Corridor, will provide the catalyst for the area to evolve the precinct into an active transit orientated centre comprising offices, retailing, community facilities and housing.

The Showground Station Precinct will be a key area to accelerate the delivery of housing as part of the DP&E's Priority Precinct Program. The precinct is expected to deliver over 5,000 new homes over the next 20 years which highlights the Precinct's important role to support growth of North West Sydney, with investment in infrastructure, providing new schools and recreation facilities alongside improvements to roads and public services.

3.0 STATUTORY PLANNING CONTEXT

The existing planning controls applicable to the site are prescribed by The Hills Local Environmental Plan 2012. The principal development controls applicable to the site are:

- Land Use Zone – R2 Low Density Residential
- Maximum Height of Buildings – 9 metres
- Maximum Floor Space Ratio – N/A

4.0 PROPOSED PLANNING CONTROLS UNDER THE PRECINCT PROPOSAL

The Precinct Proposal has identified the site within the residential apartment sub-precinct south of Carrington Road and proposes the following principal development controls to apply to the site:

- Land Use Zone – R4 High Density Residential
- Maximum Height of Buildings – 27 metres
- Maximum Floor Space Ratio – 2.3:1 – 2.7:1

The proposed land use zoning of the site is shown at **Figure 2**.

The plan for the Showground Station Precinct also proposes for a new road that will extend Fishburn Crescent between Middleton Avenue and Partridge Avenue (**Figure 3**).

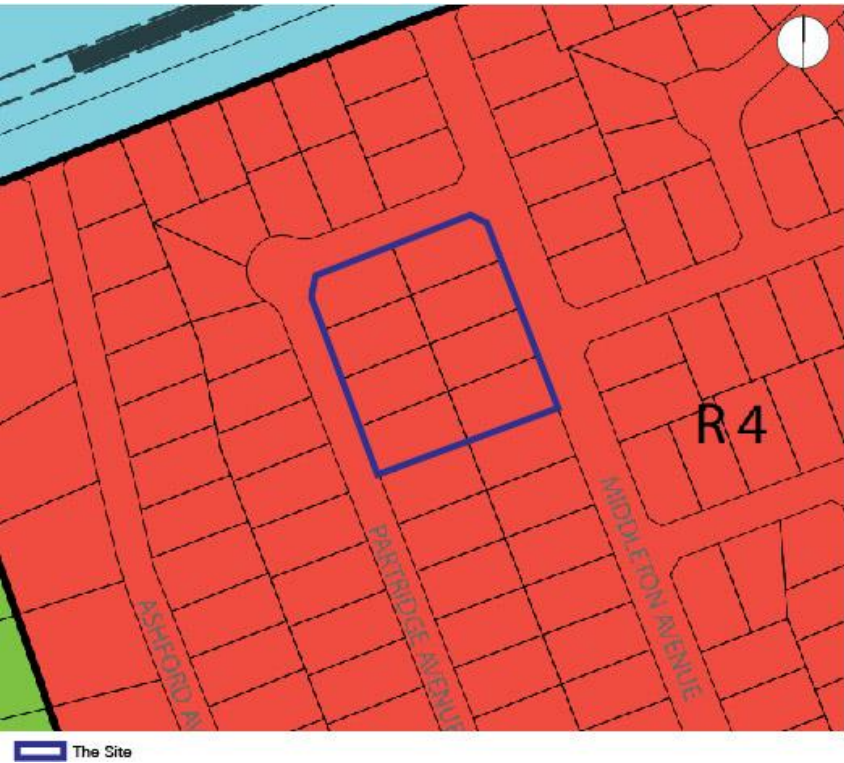


Figure 2 – The proposed zoning for the site
Source: NSW Department of Planning & Environment

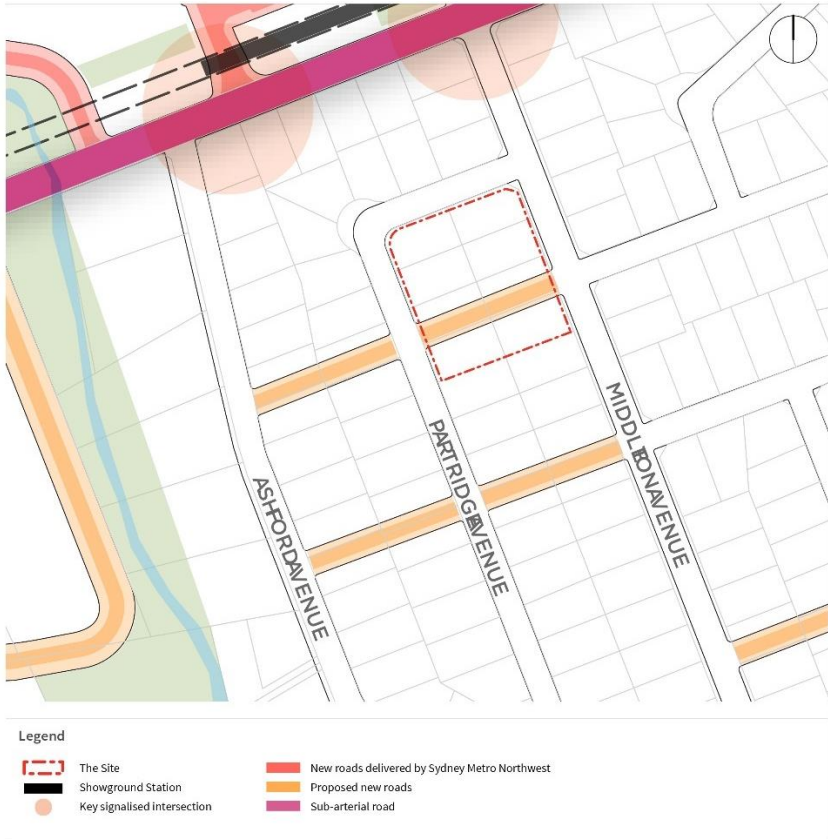


Figure 3 – The proposed Access and Movement for the site
Source: NSW Department of Planning & Environment

5.0 REMOVING FISHBURN CRESCENT ROAD EXTENSION BETWEEN MIDDLETON AND PARTRIDGE AVENUES

It is understood that the plan for the Showground Station Precinct proposes to extend Fishburn Crescent between Middleton Avenue and Ashford Avenue. It should be noted that the proposed road between Partridge Avenue and Ashford Avenue is supported, however JBA believes that a new road between Middleton Avenue and Partridge Avenue is an unnecessary proposal for the Precinct. Given the characteristics of the structure plan for the precinct and limited benefits of implementing a new road, JBA considers the proposed road infrastructure to be an unnecessary proposal that will have little to no benefit for the function of the precinct for the following reasons.

5.1 Unnecessary extension of Fishburn Crescent between Middleton and Partridge Avenues

As seen in **Figure 4**, Middleton Avenue will be a collector road within the residential apartment sub-precinct, connecting the sub-precinct to Showground Railway Station and the sub-arterial road of Carrington Road. A new signalised intersection between Middleton Avenue and Carrington Road is also proposed which will enable vehicles to exit the residential sub-precinct onto Carrington Road and connecting to the arterial road of Showground Road.

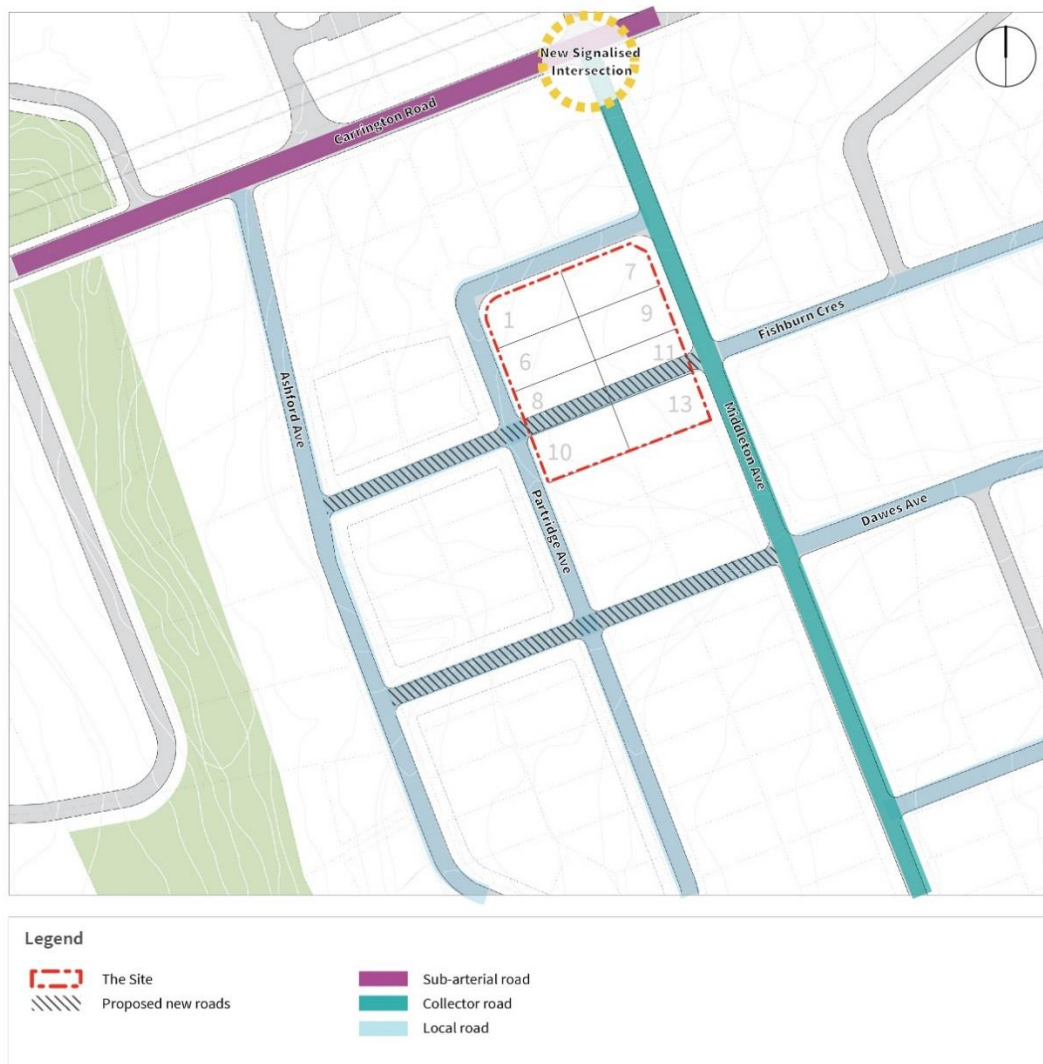


Figure 4 – Road hierarchy within Showground residential apartment sub-precinct

It is unlikely that traffic movements from Fishburn Crescent from the east will continue beyond the Middleton and Fishburn Avenue intersection on to the proposed road, as vehicles are likely to turn into Middleton Avenue due to Middleton Avenue's role as a collector road. This is further warranted by the lack of any particular destination or attraction on the western portion of the sub-precinct (i.e. parks, shops, community facilities) that would encourage travellers to travel to this area from the east. This highlights that the proposed road between Middleton and Partridge Avenue has no beneficial role in traffic movement and access arriving from the east along Fishburn Crescent.

JBA understands that the aim of the proposed road is to increase the permeability of areas west of Middleton Avenue and efficient vehicle movement to connect to Middleton Road. This is important for this part of the sub-precinct as vehicles are unable to enter onto Carrington Road from Ashford Avenue. However, it is believed that the proposed road between Middleton Avenue and Partridge Avenue has little benefit to access and vehicular movements within the residential sub-precinct.

As seen in **Figure 5** below, access and movement can be adequately supported by the proposed new roads between Ashford Avenue and Partridge Avenue (**Road A in Figure 5**) and the extension of Dawes Avenue between Middleton Avenue and Ashford Avenue (**Road B in Figure 5**) will adequately support the access and movement of the residential component west of Middleton Avenue.

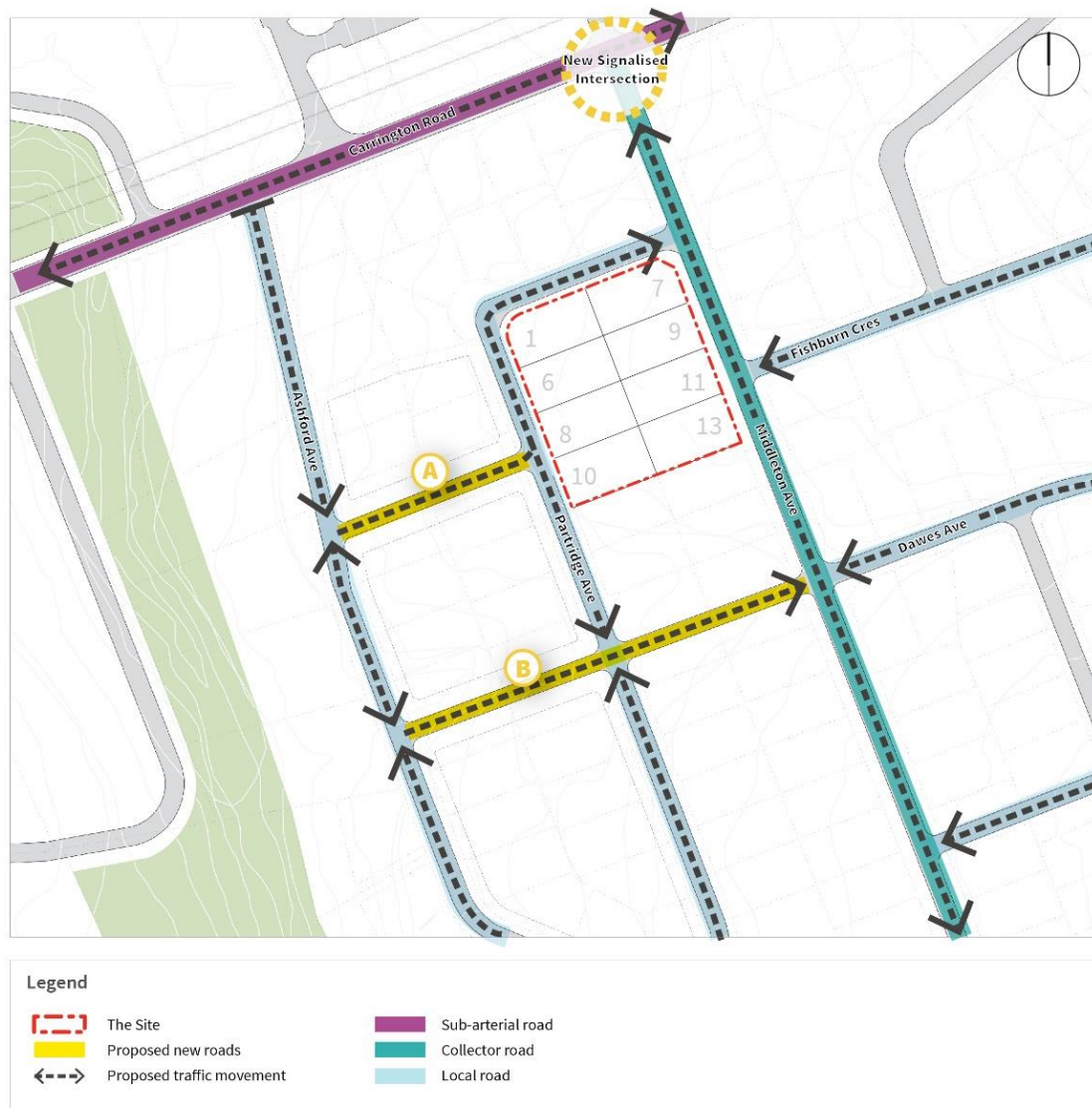


Figure 5 – Furthermore, funding for the proposed new roads is expected to be funded by local council's Section 94 Contributions. Given the little benefit of the proposed new road between Middleton Avenue

and Partridge Avenue, this will be a waste of funds to undertake the acquisition that will have little benefit to the function of the precinct. By removing the proposed new road, this will provide a greater developable area and suitable site dimensions that can effectively utilise the available FSR, enabling greater yield on the site that will increase contributory funds. This is seen to be a more effective approach to the dedication of contributory funds for other infrastructure needs within the precinct that are more pivotal to improving the function of the Showground Precinct.

5.2 Removal of proposed road will create an improved block dimensions

The proposed road extending Fishburn Crescent between Middleton Avenue and Partridge Avenue will create a small block bounded by Middleton, Fishburn and Partridge Avenues. The resulting block is not consistent with the predominant block formations of the precinct and will lead to a poor urban design outcome for the block and the precinct. Typical block dimensions within the precinct is approximately 85 metres by 150 metres, while the block affected by the proposed road will see dimensions of 83 metres by 56 metres (seen in **Figure 6**).

These dimensions will limit the flexibility in configuring built form options for the site. Due to the greater proportion of land taken up by front setback areas (5 metres) on all sides of the site, it will lead to small developable area on the site, which will limit the ability to effectively utilise all of the available FSR of 2.7:1 without compromising on residential amenity.

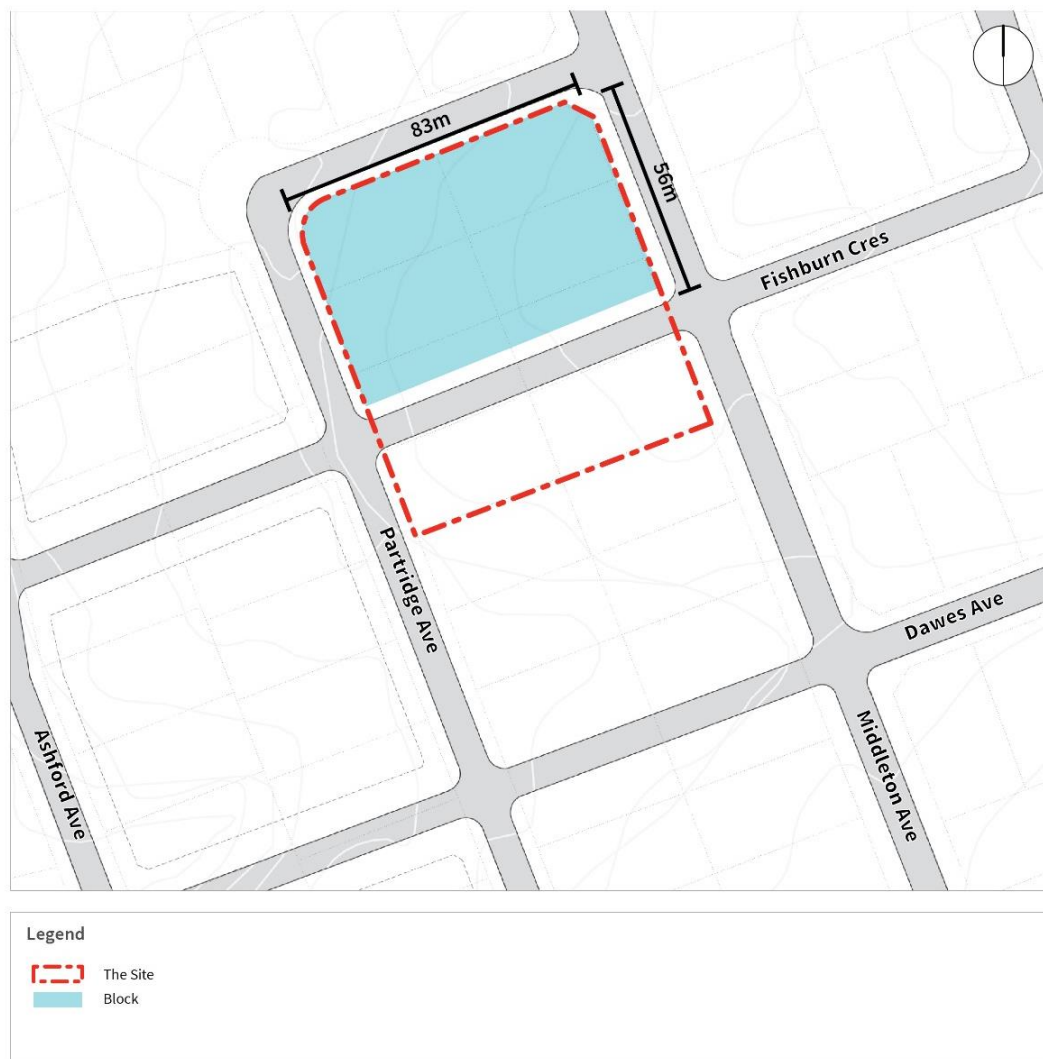


Figure 6 –

By removing the proposed new road between Middleton Avenue and Partridge Avenue, it will create an improved block formation with dimensions of 157 metres by 83 metres (**Figure 7**), which will be

consistent with the predominant block layout within the Showground Station Precinct. This will also increase the flexibility in configuring built form options that will utilise the available FSR without compromising on residential amenity, and create greater consistency in built form along Middleton Avenue. This will be critical in creating a better design outcome, while also facilitating greater dwelling yield to support the growth of the Priority Precinct.

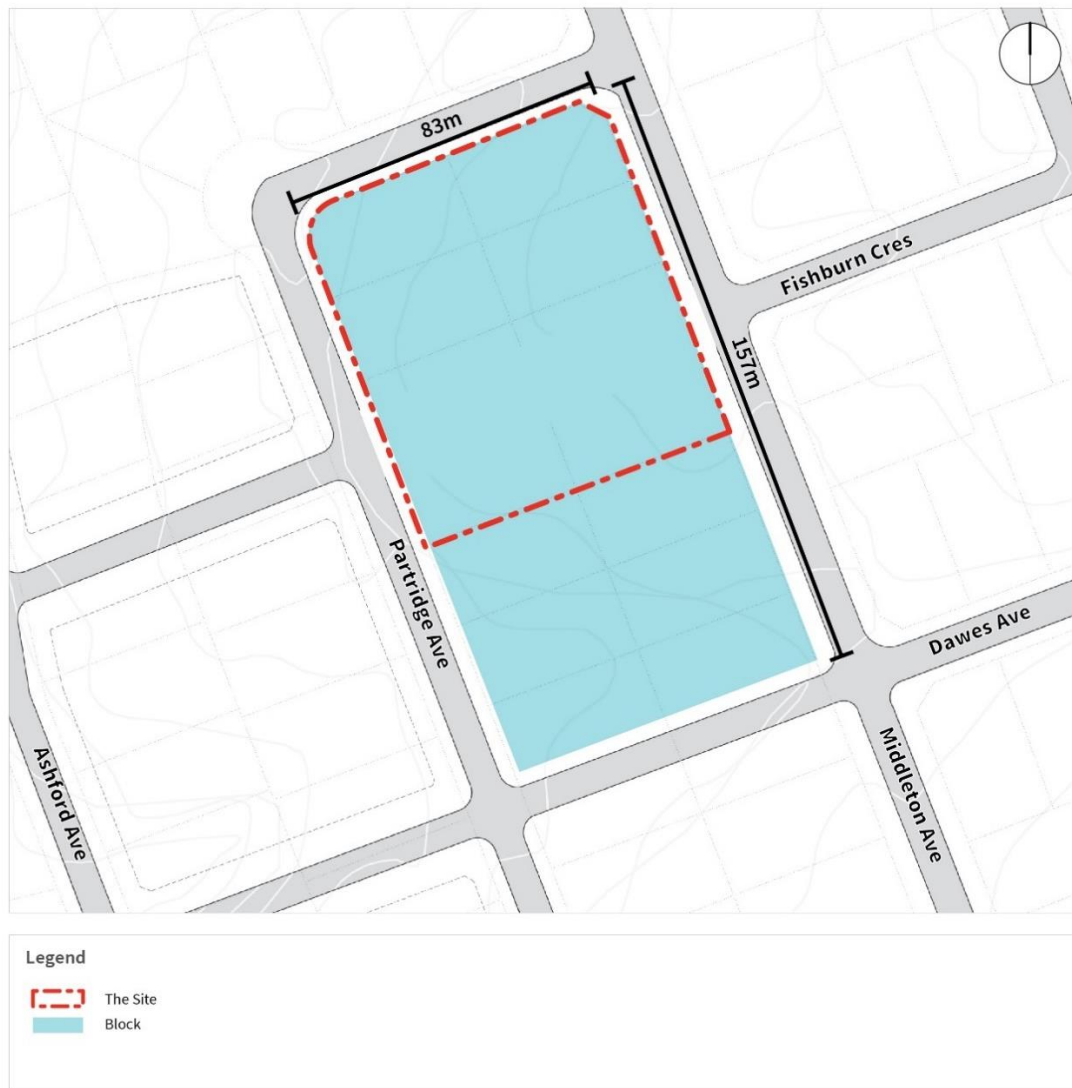


Figure 7 –

5.3 Potential Isolation

DP&E may not be aware that the land owners of the block bounded by Middleton, Partridge and Ashford Avenues have assembled into two predominant ownership groups. These groups have agreed to amalgamate as separate development parcels (seen in **Figure 8**). The two ownership groups are separated at the boundary of 10 Partridge Avenue & 13 Middleton Avenue to the north and 12 Partridge Avenue & 15 Middleton Avenue to the south.

The planned new road will lead to the isolation of 13 Middleton Avenue and 10 Partridge Avenue due to the existing amalgamation schemes between the landowners. Given the amalgamation agreements between the landowners of the block, 13 Middleton Avenue and 10 Partridge Avenue is unable to partner with the landowners group to the south.

This will result in a small residual development parcel of approximately 1982m², with dimensions that will lead to a thin elongated built form once boundary setbacks are subtracted from the site area. This

will be a poor design outcome for the site and will be inconsistent with the desired future built form of the residential sub-precinct.

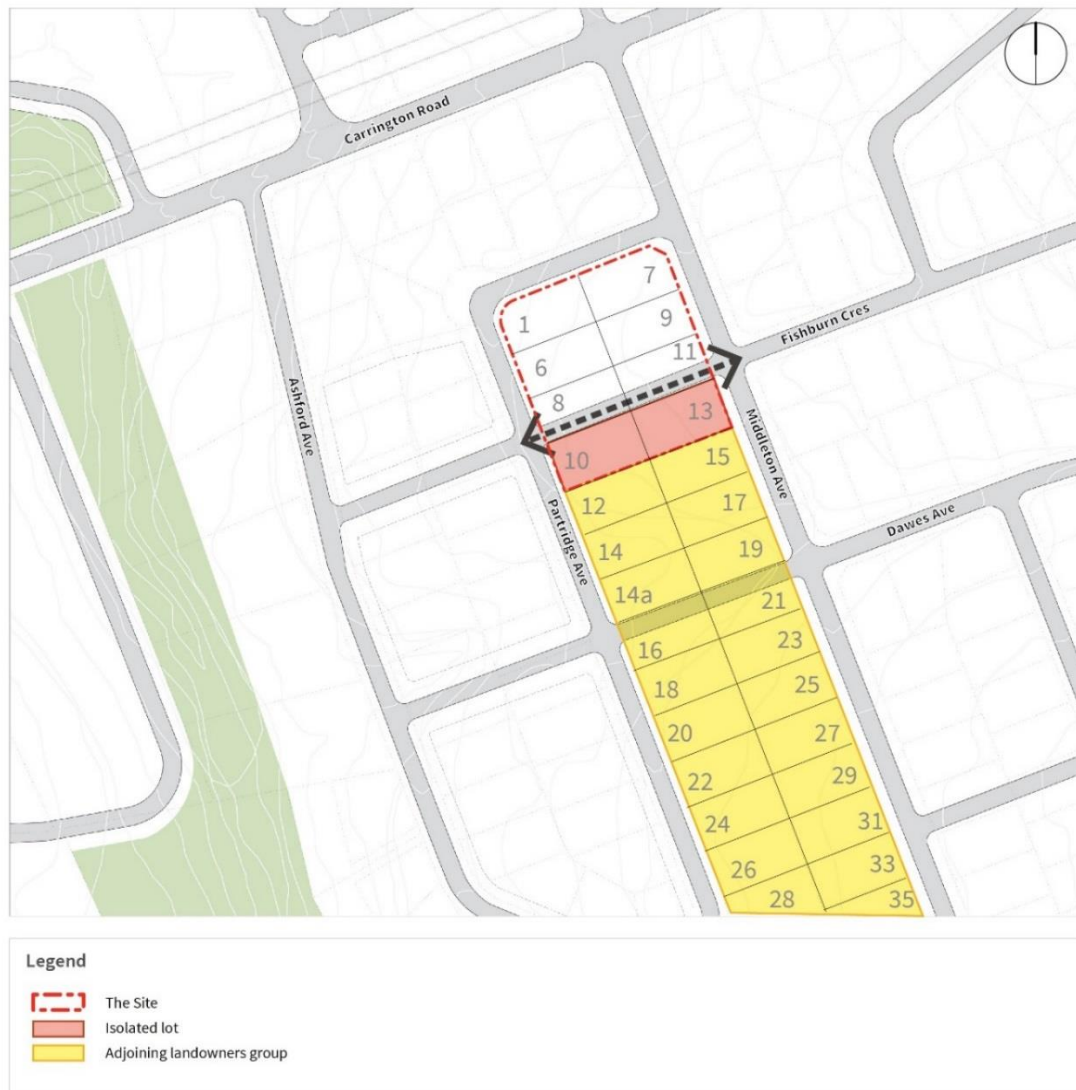


Figure 8 –

The Hills LEP 2012 also prefers larger allotments for the development of residential flat buildings within The Hills LGA, with their current clause '4.1A *Minimum lot sizes for dual occupancy, multi dwelling housing and residential flat buildings*' that requires a minimum lot size of 4000m² residential flat building developments. Although there is flexibility in the clause to develop at smaller lot sizes as long as the following can be demonstrated:

- *the form of the proposed structures is compatible with adjoining structures in terms of their elevation to the street and building height;*
- *the design and location of rooms, windows and balconies of the proposed structures, and the open space to be provided, ensures acceptable acoustic and visual privacy;*
- *the dwellings are designed to minimise energy needs and utilise passive solar design principles; and*
- *significant existing vegetation will be retained and landscaping is incorporated within setbacks and open space areas.*

These requirements will be compromised by the site constraints that will eventuate from the proposed new road. The isolation of these lots will prevent the effective utilisation of these lots that are in a prime position for the development and will hinder the potential for renewal within the precinct and limit the provision of housing to support the NWRL Strategy and the Plan for Growing Sydney.

6.0 EXTENSION OF PROPOSED 2.7:1 FSR TO ENCOMPASS 10 PARTRIDGE AVENUE AND 13 MIDDLETON AVENUE, CASTLE HILL

The site is proposed for a maximum height limit of 27 metres. However, the proposed maximum FSR under the plan splits the site, with a proposed FSR of 2.7:1 applying to 7-11 Middleton Avenue and 4-8 Partridge Avenue and an FSR of 2.3:1 applying to 10 Partridge Avenue and 13 Middleton Avenue. It is recommended that the proposed FSR of 2.7:1 is extended to encompass 10 Partridge Avenue and 13 Middleton Avenue, Castle Hill for the following reasons.

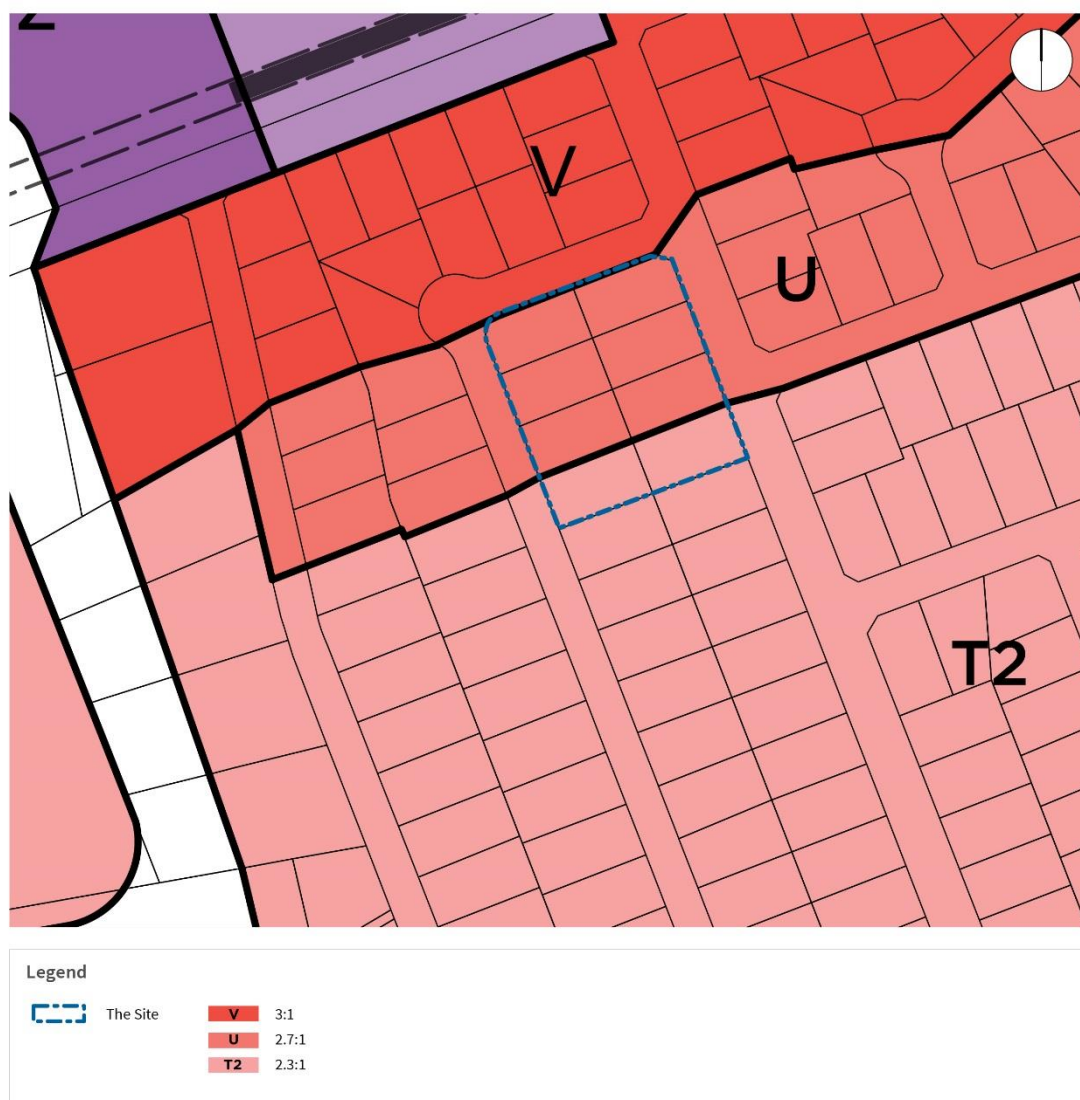


Figure 9 – Proposed FSR under Showground Precinct Proposal
Source: NSW Department of Planning & Environment

6.1 Consistency with the built form features of the Residential Apartments Sub-precinct

The key built form features of the sub-precinct:

- A range in heights, reducing further from the station to transition building heights down, and provide for a range of building forms to provide greater housing choice;
- Buildings up to 16 storeys in height on the northern side of Carrington Road and 12 storeys immediately to the south;
- Building heights reducing to 8 storeys adjoining these tallest buildings and 6 storeys further again from the station;
- 5m landscaped setbacks; and
- Private open space and landscaping requirements for a high level of residential amenity and improved appearance of new buildings.

The request to extend the 2.7:1 FSR boundary will remain consistent with the above features, particularly the desired height transition, as it does not seek to increase the height limit of 10 Partridge Avenue and 13 Middleton Avenue, only FSR.

6.2 Consistency between FSR and height limit

There is no justification found within the Showground Precinct Proposal for varying the FSR from 2.7:1 to 2.3:1 in areas that are all proposed for a maximum height limit of 27 metres. This will lead to an inconsistent built form for the site and surrounding R4 High Density Residential areas that have a 27 metre height limit. It is therefore requested that the 2.7:1 FSR be applied to not only 10 Partridge Avenue and 13 Middleton Avenue, but also the surrounding areas proposed for a 27 metre height limit within the R4 High Density Residential zone in order to support a better design outcome for the sub-precinct.

6.3 Large Site Area

One of the significant challenges for renewal is the ability to consolidate lots to create a sufficient development parcel. Due to the site's large, consolidated site area as a result of the landowner's agreement to consolidate into one development parcel, it is an ideal site to support growth and catalyse the process of urban renewal within the Showground Station Precinct.

7.0 CONCLUSION

There are a number of compelling planning and urban design reasons to support the removal of the proposed new road between Middleton Avenue and Partridge Avenue:

- the extension of Fishburn Crescent between Middleton and Partridge Avenues is considered unnecessary to improve access and vehicular movement within the precinct;
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Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or cprocter@jbaurban.com.au.

Yours sincerely,



Chris Procter
Director