



25 February 2016

Director Urban Renewal
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Madam

**DEPARTMENT OF PLANNING AND ENVIRONMENT
SHOWGROUND STATION PRECINCT PROPOSAL –RESPONSE ON BEHALF OF 12 LAND
OWNERS AT MIDDLETON AVENUE AND PARSONAGE ROAD, CASTLE HILL**

APP Corporation Pty Ltd (APP) has prepared this submission on behalf of twelve (12) landowners known as the '12 POD' within the Showground Station Precinct in response to the exhibited Showground Station Precinct Proposal and Draft Development Control Plan (DCP). Whilst the 12 POD group, welcomes the public exhibition of the draft documentation and endorses the vision for the precinct, there are a number of issues in relation to the draft plan and DCP, which the 12 POD landowners and residents wish to bring to the Department of Planning and Environment's (DPE) attention, the most notable of which is that the Precinct Plan, as currently drafted:

- is not financially viable for the proposed R3 Medium Density land;
- proposes a R3 Medium Density zoning that prohibits the redevelopment of land for residential flat buildings within a block that:
 - is within a 650-800 m (walking distance) from the site of the new Showground train station;
 - currently has excellent access to public transport (bus stops immediately adjacent on Parsonage Road and Middleton Avenue, two main thoroughfares to Carrington Road);
 - will have even better access to the new Showground train under the Draft DCP which envisages new footpaths, cycle ways and improved pedestrian amenity;
- proposes an urban structure that has not considered future ownership patterns or site amalgamations and fails to recognise that many of the landowners including the 12 POD site which comprises a 1.07 hectare block are united in anticipation of the future redevelopment of their land; and
- proposes a new local road layout over the 12 POD land that is unnecessary, hinders the consolidation of land holdings and adopts a building configuration that is both clumsy and assumes a specific product mix without undertaking detailed site analysis.

The 12 POD land owners are identified in **Appendix A**.

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1.0 Site Location and Context

The 1.07 hectare site is located within the block bounded by Middleton Avenue to the north, Parsonage Road to the south and James Place and Cockayne Reserve to the west (refer to Figures 1 and 2). An existing 1.5 m wide pedestrian and cycle pathway is located along the block's eastern boundary and provides a mid-block connection from Parsonage Road to Middleton Avenue to the north. There are six (6) bus stops along this block (i.e. 3 stops on each side of the road), which are currently serviced by Hillsbus Route 604 which provides regular access from Parramatta Station to Castle Hill (Castle Towers), via Parsonage Road and Middleton Avenue and what will be the location of the new train station at Showground.

From 45 Middleton Avenue, the walking time to the new train station at Showground is approximately seven (7) minutes at a leisurely pace. A time quicker than some of the land within the R4 zone without a direct route.

Views of the 12 POD site are provided in Figures 3-6.

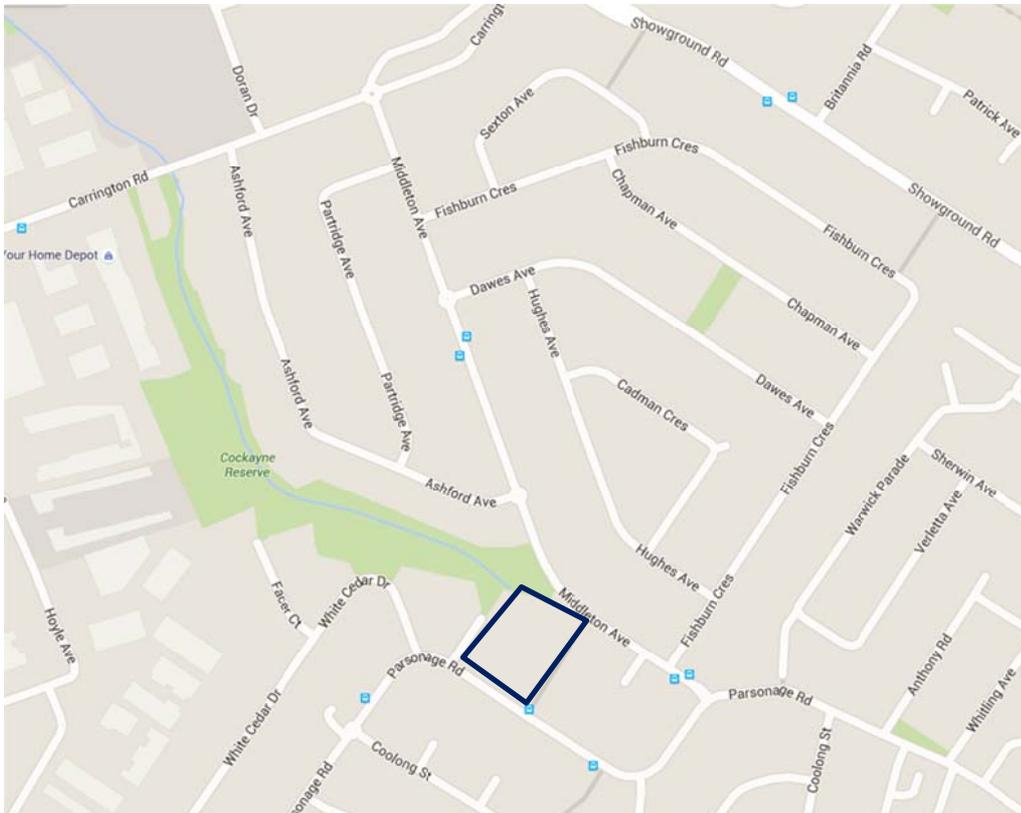


Figure 1 – General location of the 12 POD landowners



Figure 2 – Detailed Location Plan



Figure 3 – View of 12 POD properties along Parsonage Road, looking west



Figure 4 – View of 12 POD properties along Middleton Avenue, looking south-east



Figure 5 – View of 12 POD properties along Middleton Avenue looking west (and view of existing public pathway to the east of the 12 POD land)



Figure 6 – View of 12 POD properties on the corner of Parsonage Road and James Place, looking north

2.0 Showground Station Precinct Proposal

The draft Showground Station Precinct prepared by the DPE has been developed with the vision to create ‘The Hills Cultural and Innovation Precinct’. It shows in draft form, how the overall Showground Station Precinct including the Showground landowners group land, is anticipated to be developed over time. An extract of the Draft Precinct Plan illustrating where the 12 POD landowners APP represent is included in Figure 7.

Under the Showground Station Precinct Proposal, the 1.07 hectare site is proposed to be zoned R3 Medium Density Residential, with a minimum lot size of 240m² and a maximum height limit of 9 m (refer to Figures 8 and 9).

The precinct proposal also proposes:

- Improve Cattai Creek Corridor / Cockayne Reserve to be more publicly accessible and better connected to other parts of the precinct by providing paved bicycle and walking paths, lighting, landscaping;
- Upgrade pedestrian and cycling infrastructure for improved access in the precinct and encouraging more walking and cycling from the station for residents and workers (page 31-32 of planning report) by:
 - Providing new footpaths along Parsonage Road and Middleton Avenue ;
 - Proposing a new on-road cycleway along Parsonage Road and Middleton Avenue;
 - Proposed off-road cycleway from 45 Middleton Avenue running west through Cockayne Reserve to station, local centre and Fred Caterson Reserve further north; and
- Proposed new north-south road from Turton Place to Parsonage Road and new east-west road which connects end of James Place to new north-south road. These roads are identified in the precinct plan as “proposed new roads for further investigation” but in the draft DCP are shown as new roads.

The proposed pedestrian and cycling infrastructure is shown in Figure 10.

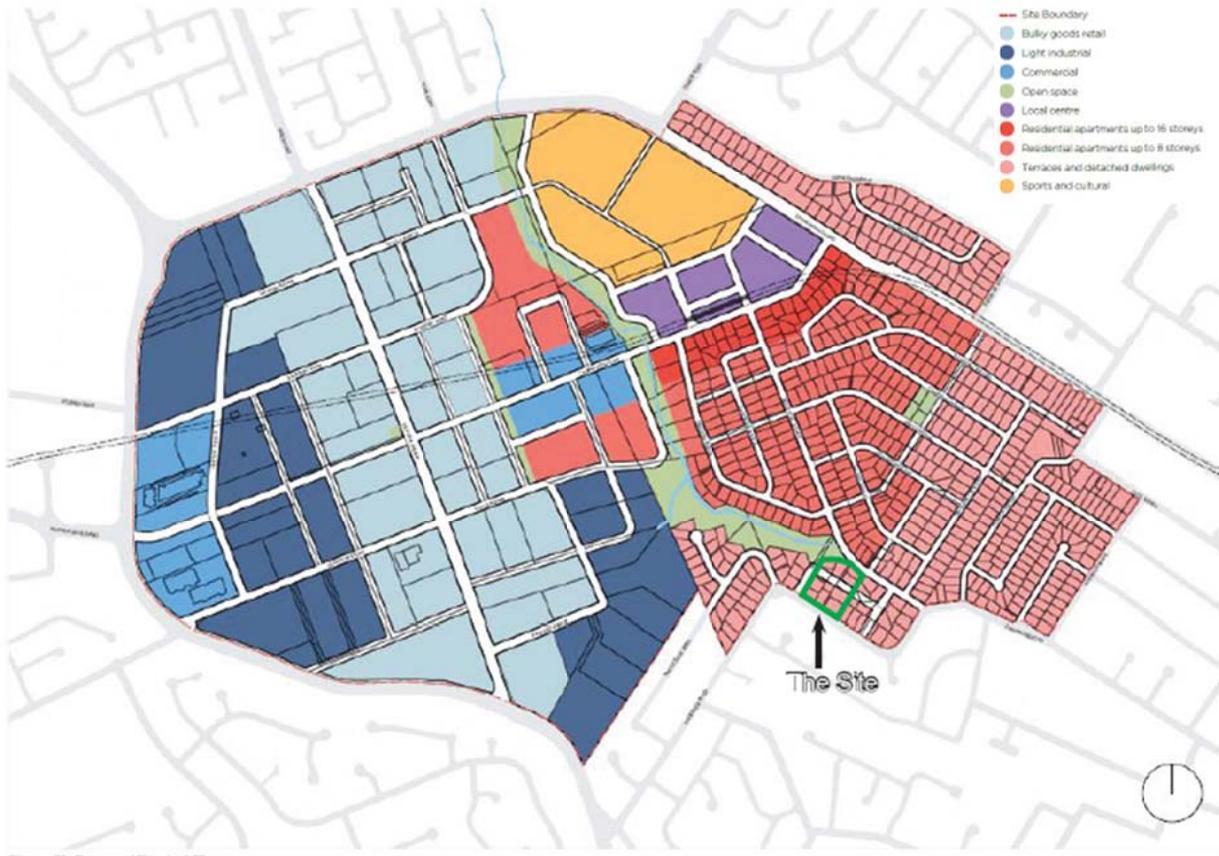


Figure 7 – Showground Precinct Plan

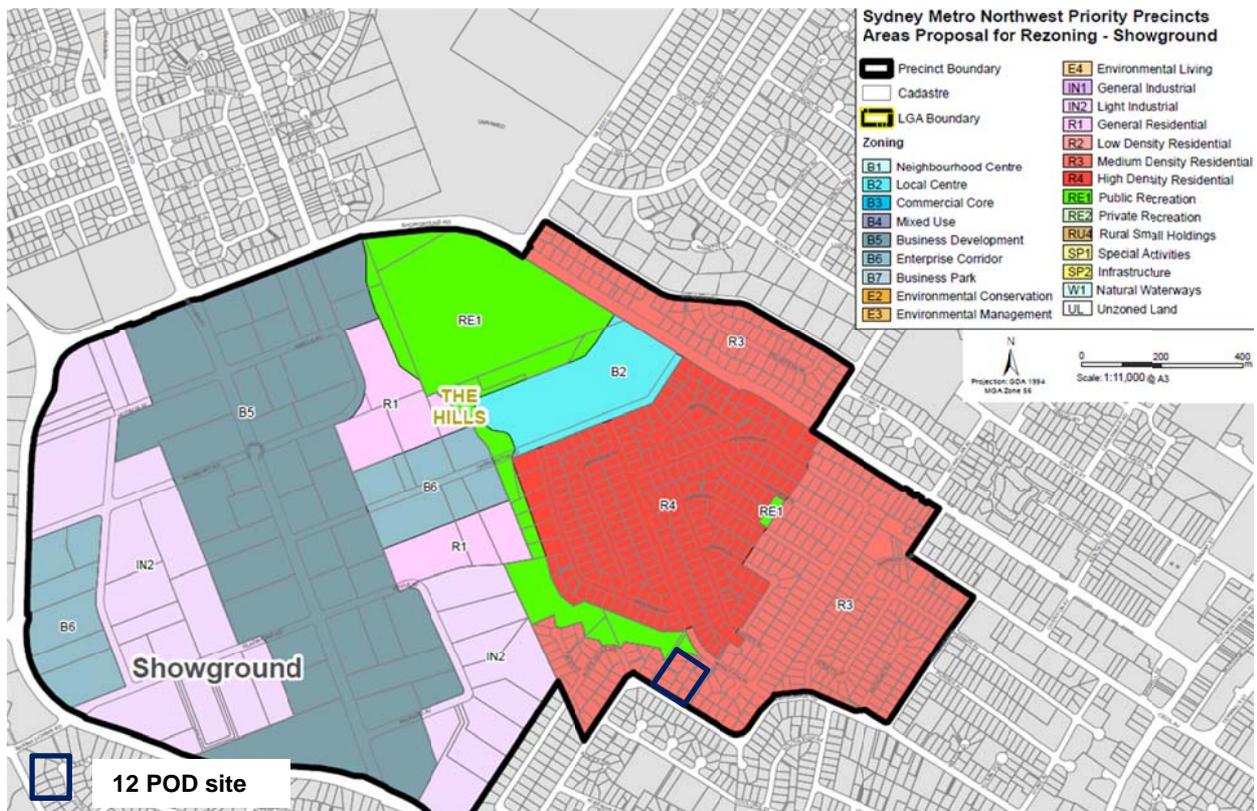


Figure 8 – Extract of proposed zoning map

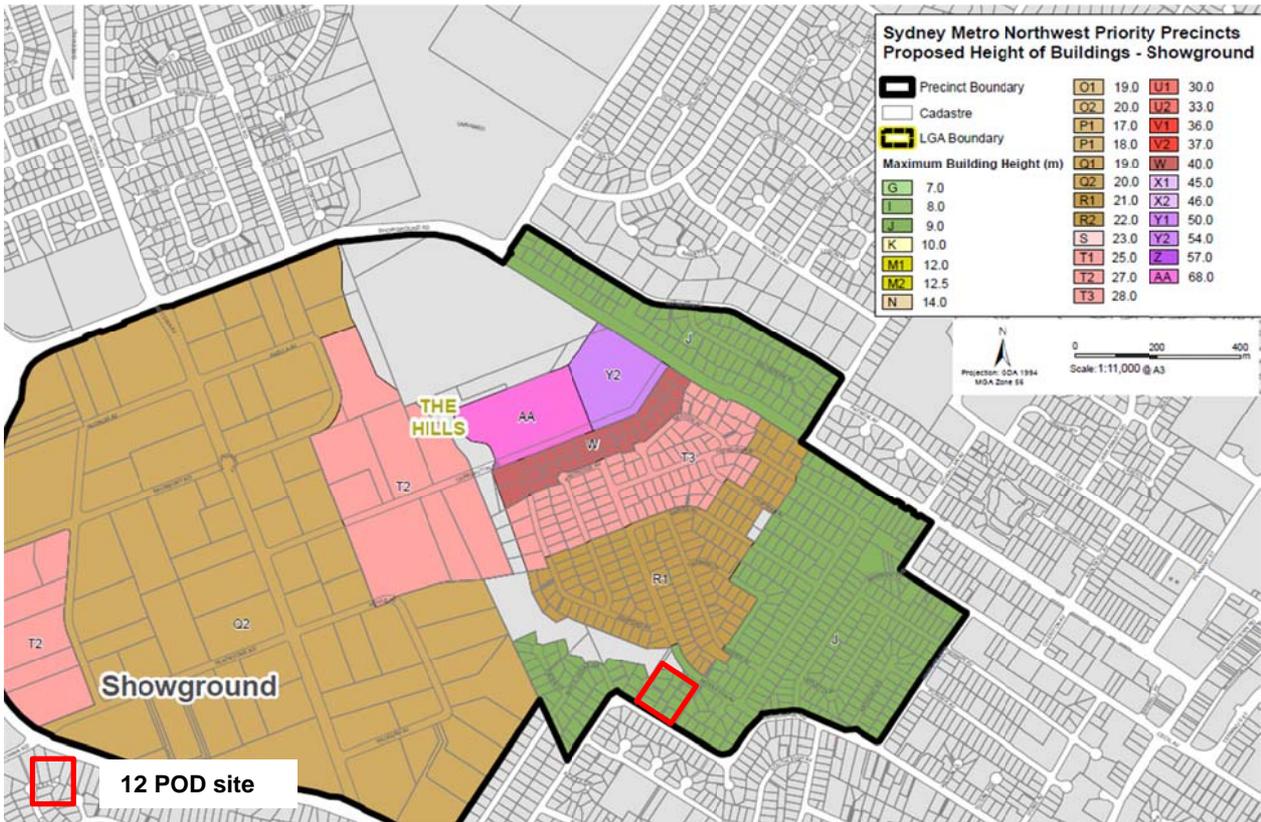


Figure 9 – Extract of proposed height map



Figure 10 – Proposed access and movement within the 12 POD site, envisaged under Precinct Plan and Draft DCP

3.0 The Issues

An explanation of our concerns raised in respect of the draft precinct proposal and draft DCP is provided below.

3.1 Financial Viability of the Showground Precinct Plan Residential Area

The draft precinct proposal is not financially viable for the proposed R3 Medium Density zoned land which includes the 12 POD land. The prohibition of residential flat buildings within the R3 zone combined with the proposed lot sizes and height controls detract from current land values and provides no incentive for landowners to sell and no incentive for developers to purchase. If an urban transformation of the Showground Precinct is to occur, existing land owners must be motivated to sell and therefore will need a sales price for their home that exceeds its pre zoned land value.

APP has undertaken a high level financial feasibility analysis of the Draft Precinct Plan, the details of which are provided in the Showground Landowners submission prepared by APP (refer to Showground landowners submission). In summary, the analysis found that the R3 Medium Density zone would have an adverse effect on land prices. At current market prices, anything less than the R4 High Density zone, and realistic height controls is unlikely to be developed as it would not meet developer requirements for commercial returns. As a consequence, the R3 Medium Density zone with expectations to create smaller town house living would not be realised today nor well into future years. Indeed large lot, 700m² dwellings could become in greater demand given reduced supply making their market value lift considerably. The analysis found that the proposed R4 High Density zone, with 6 to 8 storey apartment developments is highly likely to sell. It is a viable development option that is necessary in The Hills area where land values are generally higher than other western Sydney urban renewal areas.

APP strongly urges the DPE to amend the precinct plan to provide an R4 High Density zone on the 12 POD land.

3.2 Boundary of the R4 High Density zone

The precinct plan, as currently drafted, envisages higher density development (residential flat buildings) within and adjacent to the town centre and new Showground Train Station, maximising access to services and public transport. Consistent with sound urban design principles, the draft plan has been prepared on the basis that most people are comfortable with a 10 minute walk to public transport and shops and services, which is about a distance of approximately 800 metres. This makes sense.

The 12 POD land is wholly located within 650- 800 m from the site of the new Showground train station, has existing street access on three sides and a pedestrian access on the fourth and currently has excellent access to public transport (bus stops located along Parsonage and Middleton Avenue, two main thoroughfares to Carrington Road). Under the draft precinct proposal and DCP, access and movement adjacent to and surrounding the 12 POD land will get even better, as new pedestrian and cycling infrastructure and additional through-site links through Cockayne Reserve to station, local centre and Fred Caterson Reserve further north are realised. It makes sense that the 12 POD land, which is within an easy 650- 800 m walk of the new train station, and which currently has and will be enhanced public transport is proposed to be zoned R4 High Density.

Higher densities should also be located in areas with high visual or landscape amenity such as within and around areas of open space. The immediate opposite homes on Middleton Avenue

have been zoned R4 and are the same distance to the new station as the subject land. That is, land on the northern side of the Cockayne Reserve is proposed to be zoned R4 High Density, however land on the southern side of the reserve including the 12 POD land is proposed to be zoned R3 Medium Density. This does not make sense.

APP strongly urges the DPE to amend the precinct plan to provide an R4 High Density zone on the 12 POD land.

3.3 Height

The draft Precinct Proposal currently proposes a 9 m height limit over the 12 POD land. As discussed above, higher density development (residential flat buildings) within taller building forms will benefit from a high level of accessibility to the station, shops and other facilities planned within the local centre. It makes sense from a public transport and road network perspective, to get as much as the population within walkable proximity to the train station and along key thoroughfares (roads and bus / cycle lanes) which have a direct access to the new train station and limit the 'spread' to the east and south-east.

Middleton Avenue is a main and direct route through to the station having the most efficient walking distance. It is also envisaged to have a designated bike lane. Like Showground Road, this avenue which includes the pocket of land bound by White Cedar Drive and Parsonage Road (southern and western sections) and includes the 12 POD land should be rezoned R4 High Density along with a corresponding height. Taller building forms free up the ground plane providing opportunities to provide additional open space (both public and communal space) and pocket parks and through-site links. Middleton Avenue should be treated as a significant element to the precincts public domain with the landscaping treatment to make it truly "Avenue" like.

It is indicated that the Precinct Plan seeks to achieve a 'gradation of height levels from the Station through to lower density two storey areas. In APP's view the transition of height from higher density to lower density is managed in an urban design sense through building design, potential tapering of higher levels, through landscape treatments along roadways and through road width and setbacks. These design features can be achieved on this site and through objective based controls within the DCP. Urban areas commonly manage design changes between high density and lower density forms, this should not lead to height and zoning controls that become commercially unviable and unattractive to developers.

It is requested that the Proposed Height of Buildings Plan be amended to maximise density and height closer to the new train station and local centre. For the 12 POD land this means an R4 High Density zone with a 21 m (6-7 storeys) height limit.

3.3 Consolidated land holdings

The draft precinct proposal and DCP proposes an urban structure that has not considered future ownership patterns or site amalgamations, failing to recognise that many of the landowners including the 12 POD land holding which comprises a 1.07 hectare block are united in anticipation of the future redevelopment of their land. The 12 POD residents are prepared to consolidate their holdings in land sales to maximise the design benefit that will be attractive to quality developers, urban planners and future residents. A set of controls that encourages master planned outcomes as opposed to small lot, say 1,500 square metre apartment developments that present with different building forms, facades, building materials and the like.

3.4 The Proposed Road Layout

The new road layout presented in the draft Precinct Plan and DCP is an unnecessary inhibitor in allowing good urban design outcomes. The proposed new local road layout which is overlain on the 12 POD land is identified in one part of the Precinct Plan “for future investigation” but in another part of the DCP locks these roads in over the 12 POD land. The local road layout is unnecessary, hinders the consolidation of land holdings and adopts a building configuration that is clumsy, assuming a specific product mix and layout without undertaking a detailed site analysis. Such fine grain detail for a local road layout is not needed at this stage of planning. It creates a rigidity in planning controls that prevents innovative designs and fails to promote the consolidation of the allotments into larger parcels of land that can be master planned and integrated through detailed design with a good movement network. Good permeability, movement and accessibility initiatives for Showground can be set through a set of planning objectives within a DCP. Flexibility should be encouraged and applicants for future development given the opportunity to achieve these objectives through a detailed master planning process. This local road layout detail should be removed, specifically the proposed new north-south road from Turton Place to Parsonage Road and new east-west road which connects end of James Place to new north-south road. The Transport Analysis with the draft Precinct Plan has not provided the detail to demonstrate their need nor their justification for the location chosen, so their inclusion is premature. Indeed, if any road was to be provided in this area, it would be far more beneficial and cost effective for Council that it be designed as a private road without reliance on Section 94 funding for its delivery.

3.4 Opportunities to enhance Cattai Creek

As part of the precinct planning process there is a real opportunity to enhance Cattai Creek as part of the stormwater management for the precinct and create more attractive green band linking Middleton Avenue to Fred Caterson Reserve with associated cycle and walkways picnic sites. The 12 POD land is located adjacent to the southern end of this reserve.

4.0 CONCLUSION

Planning for the Showground Station Precinct is a once in a lifetime opportunity to transform the precinct into an exemplary high density mixed use community. The Showground landowners are advocating for a precinct plan and supporting planning framework for the Showground Station Precinct that is realistic, financially sound and forward looking.

As discussed in this submission, the draft Precinct Plan and supporting DCP:

- is not financially viable for the proposed R3 Medium Density land;
- proposes a R3 Medium Density zoning that prohibits the redevelopment of land for residential flat buildings within a block that:
 - is within 650-800 m (walking distance) from the site of the new Showground train station;
 - currently has excellent access to public transport (bus stops located along Parsonage and Middleton Avenue, two main thoroughfares to Carrington Road);
 - will have even better access to the new Showground train under the Draft DCP which envisages new footpaths, cycle ways;
- proposes an urban structure that has not considered future ownership patterns or site amalgamations and fails to recognise that many of the landowners including the 12 POD site which comprises a 1.07 hectare block are united in anticipation of the future redevelopment of their land; and
- proposes a new local road layout over the 12 POD land that is unnecessary, hinders the consolidation of land holdings and adopts a building configuration that is both clumsy and assumes a specific product mix without undertaking detailed site analysis.

We strongly urge DPE to reconsider planning for the 12 POD land in terms of its proposed zoning and height limits, which should be reflective of the land's location within 650-800 m of the new Showground train station, its excellent access to existing and future pedestrian paths and cycleways and its location adjacent to Cockayne Reserve, an area with high visual and landscape amenity.

We trust DPE will consider the issues raised in this submission. Should you have any questions, please do not hesitate to contact Allison Smith or Elise Cramer on 9956 1295 or email Elise.Cramer@app.com.au.

Yours sincerely

APP CORPORATION PTY LIMITED

A handwritten signature in black ink that reads "Allison Smith". The signature is written in a cursive style with a small mark above the 'i' in "Smith".

Allison Smith
Executive Manager
Urban Development

Appendix A – The 12 POD landowners

| No | Name | Address |
|----|----------------------------|--------------------|
| 1 | McCORMACK, Brian | 3 James Place |
| 7 | WATTS, Peter & Jocelyn | 7 James Place |
| 3 | CHEN, Frieda | 9 James Place |
| 4 | DAINES, Neil & Gail | 45 Middleton Road |
| 5 | ABUL, Kalam & Eve | 45a Middleton Road |
| 6 | SALIB, Talaat & Madeleine | 47 Middleton Road |
| 7 | CHEN, Doug & Veronica | 49 Middleton Road |
| 8 | FONG, James & Sandra | 86 Parsonage Road |
| 9 | HONEYMAN, Peter & Jodie | 88 Parsonage Road |
| 10 | HOWE, Richard & Sharon | 90 Parsonage Road |
| 11 | FALAMICH, Michelle & Peter | 92 Parsonage Road |