

26 February 2016

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



Dear Director Urban Renewal

Showground Precinct Planning Proposal Submission

We thank the Department of Planning for the opportunity to comment on the Planning Proposal relating to the urban renewal surrounding the new Showground Station, located in the Hill Shire Local Government Area. Elton Consulting has drafted this submission on behalf of Helvetia Project Management and the following land owners outlined in Table 1.

Table 1 Landowners associated with this submission

Street Address	Legal Description
16 Chapman Avenue	Lot 33 DP 246981
18 Chapman Avenue	Lot 32 DP 246981
20 Chapman Avenue	Lot 3 DP 583999
22 Chapman Avenue	Lot 128 DP 250610
24 Chapman Avenue	Lot 127 DP 250610
26 Chapman Avenue	Lot 126 DP 250610
28-30 Chapman Avenue	
17 Dawes Avenue	Lot 18 DP 255722
19 Dawes Avenue	Lot 19 DP 255722
21 Dawes Avenue	Lot 20 DP 255722
23 Dawes Avenue	Lot 21 DP 255722
25 Dawes Avenue	Lot 22 DP 255722
27 Dawes Avenue	Lot 23 DP 255722
22 Middleton Avenue	Lot 302 DP252593
24 Middleton Avenue	Lot 301 DP 252593
26 Middleton Avenue	Lot 207 DP 249973
28 Middleton Avenue	Lot 206 DP 249973
14 Middleton Avenue	Lot 35 DP247890
16 Middleton Avenue	Lot 36 DP 247890



Street Address	Legal Description
30 Middleton Avenue	Lot 205 DP249973
32 Middleton Avenue	Lot 204 DP 249973
34 Middleton Avenue	Lot 203 DP 249973
36 Middleton Avenue	Lot 202 DP 249973
3 Fishburn Avenue	Lot 34 DP 247890
5 Fishburn Avenue	Lot 33 DP 247890
7 Fishburn Avenue	Lot 35 DP 594083
9 Fishburn Avenue	Lot 36 DP 594083
11 Fishburn Avenue	Lot 37 DP 594083
11a Fishburn Avenue	Lot 1 DP 592885
15 Fishburn Avenue	Lot 123 DP 250610
28 Chapman Avenue	Lot 125 DP 250610
30 Chapman Avenue	Lot 124 DP 250610
37 Dawes Avenue	Lot 28 255722
39 Dawes Avenue	Lot 34 DP 594083
41 Dawes Avenue	Lot 32 DP592887
43 Dawes Avenue	Lot 31 DP 592887
45 Dawes Avenue	Lot 37 DP 247890

With the State Governments commitment to infrastructure, namely new railway line and railway station of the North West Metro, and in particular in the Showground precinct, scheduled for completion in 2019, our clients generally support the structure plan that will facilitate increased commercial and residential opportunities.

As land owners and interested stakeholders, we however have comments regarding how this new important infrastructure should be supported to:

- » maximise rail patronage and increase active transport combined with public transit patronage;
- » create correct floor space ratios and heights to support well designed and sustainable development;
- » reduce private vehicle dependence and associated costs of living impacts; and
- » deliver a strong framework for improvements in the public realm in the Showground precinct.

This submission outlines our support, but also our comments for improvement, to the Showground precinct.

Comments on the Showground Precinct Planning Proposal

1. Showground Precinct Structure Plan

Our clients are supportive of the structure plan outlined in the Showground Planning Proposal. However, it is considered that one of the key elements that has not been emphasised is the



provision of density within 400 - 800m of the railway line and providing increased housing density and heights. The density can also be supported by the retention of the Chapman Avenue Reserve which can provide opportunity for enhanced public realm opportunities.

The structure plan should consider the road hierarchy surrounding, and getting, to the Showground Station. It is proposed that more emphasis should be included on the Middleton Avenue spine (which links to Partonage Road) as it can provide a local connecting road to the surrounding areas and to the Showground Station. This local connecting route could have considerable advantages for the structure of the Precinct.

Middleton Avenue, between the new Showground Station and Fishburn Crescent (southern end), has the following positive attributes:

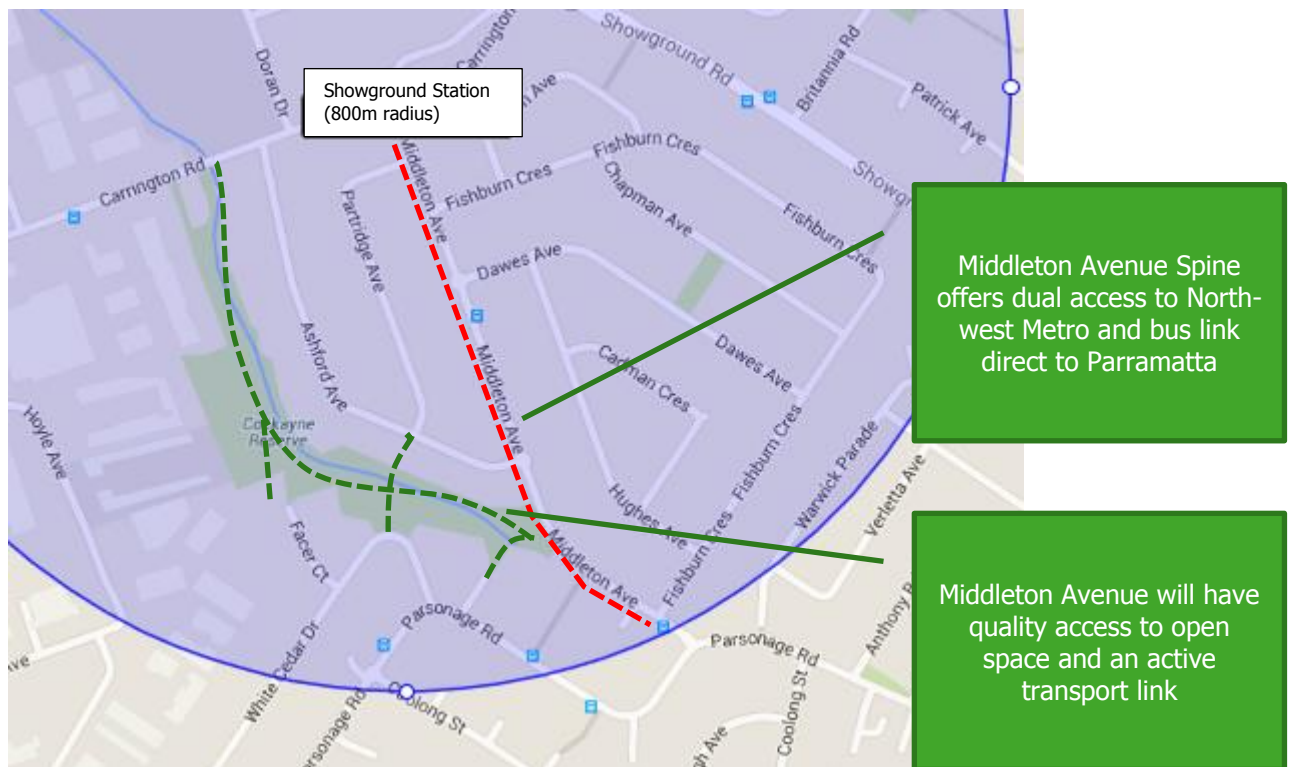
- » from Fishburn Crescent to the Showground Station is a maximum of 800m walk;
- » it is serviced by an existing bus routes with a stop opposite Fishburn Crescent (southern end) to Showground Station (approximately 800m to the station), and a stop just south of Dawes Crescent (400m to the station);
- » importantly, this bus route not only connects with the North-west Metro but also connects the location to Parramatta, the second Sydney Metropolitan CBD;
- » to the west of Middleton Avenue is Cockayne Reserve that could offer significant recreational opportunities, while maintaining and improving the natural bush setting and natural drainage functions, but also an active transport route to the core of the Showground Precinct. This could also offer an active transport network to encourage access to the Showground Station in areas outside the growth precinct.

An illustration is provided below and this active transport/space linkage is supported in the Planning Proposals structure plan (see Figure 1).

As a result, we believe there is solid evidence that the Middleton Avenue spine to Fishburn Crescent (southern end) could support greater residential growth that currently envisaged under the planning proposal. In addition, this spine should also be the focus of significant public realm improvements providing an attractive active transport route.

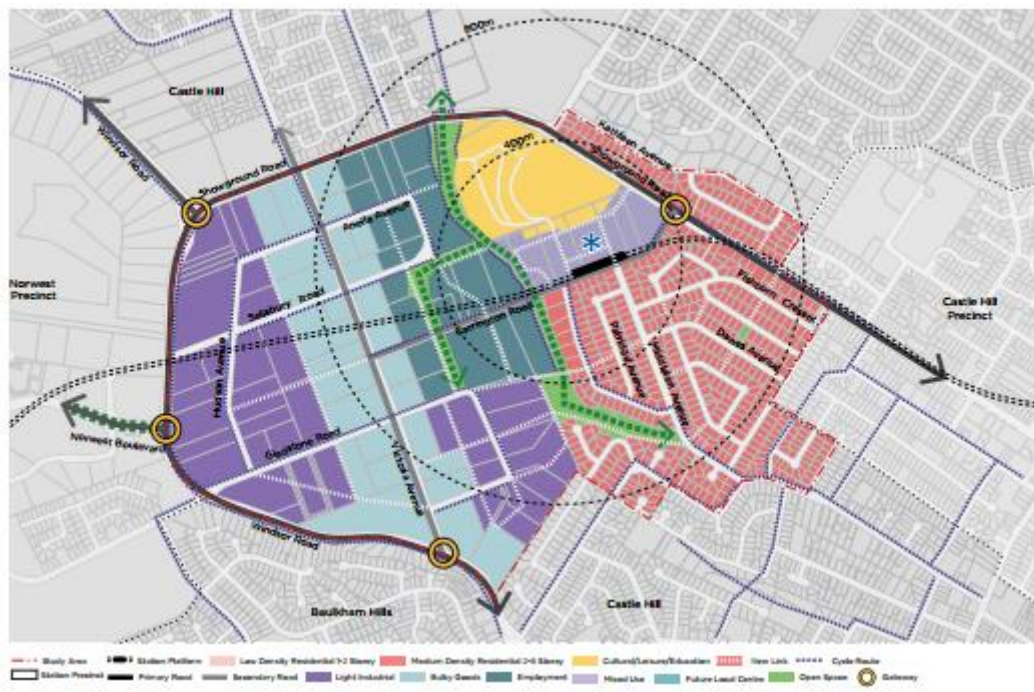


Figure 1 Middleton Avenue access and open space advantages



Nearmaps

Figure 2 Showground Precinct Structure Plan



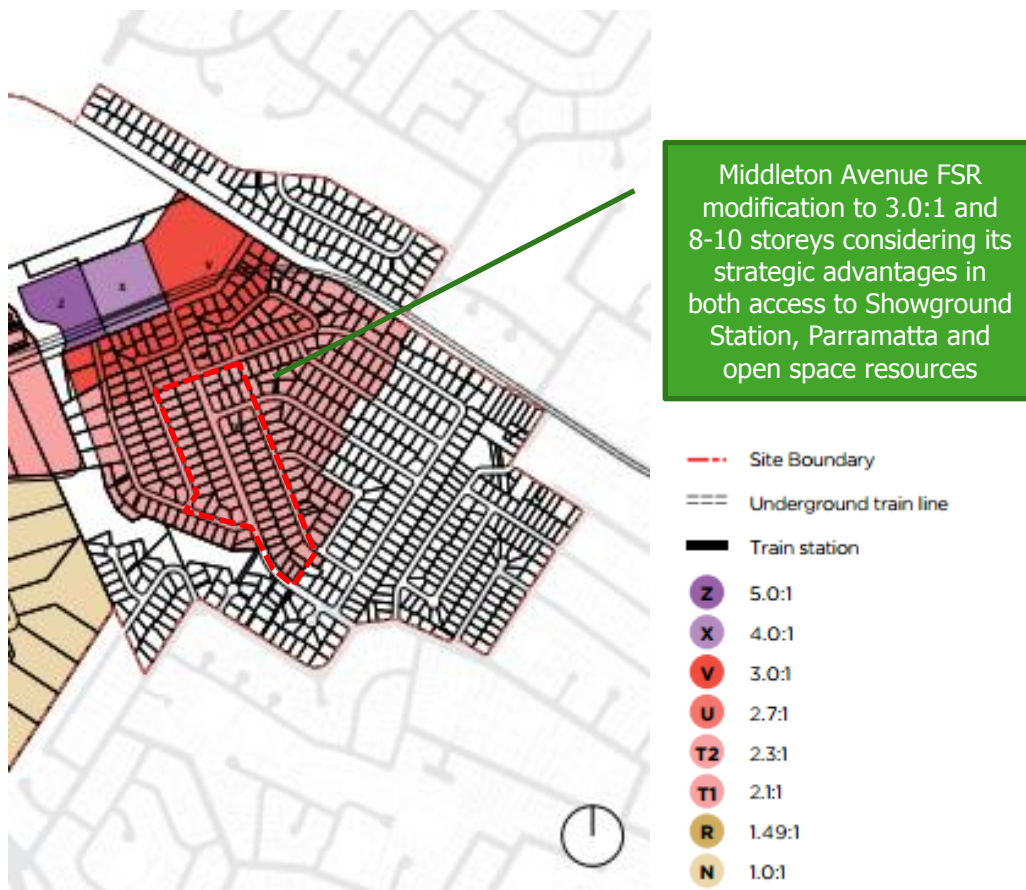
Showground Precinct Planning Proposal



It is proposed that the Middleton Avenue spine should support greater density along and to the southern end of Fishburn Crescent considering its accessibility to both the North-west Metro and Parramatta, with access to recreational resources.

As a result, we would suggest that an appropriate FSR for the Middleton Avenue spine should be 3.0:1 rather than 2.3:1, as in the northern end of this road, to create cohesive built form. The height limit could also be modified to allow 8 - 10 storey development.

Figure 3 Suggested modification to planning controls for the Middleton Avenue spine



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2. Disconnect between FSR and height controls in some areas of the R4 zone

An analysis undertaken of the sites relating to this submission in the Showground Precinct, indicates that the FSR's are not increased commensurate with the increased building heights. This is applicable to the area in Figure 4 outlined in the dotted red line.

While we support a transition of building heights further from the station, the increased building height will not result in any further development potential in this area, despite the lands excellent accessibility to the station, as a result of uniform FSR applied to it (2.3:1).



Figure 4 Planning Proposal Building Height Map (left) & FSR Map (right)



Planning Proposal Building Height Map and FSR Map

An approximate eight storey height limit with an FSR of 2.3:1 will result in an approximate building footprint of 30% in the area, whilst areas south of the dotted line will be six storeys with an approximate 40% footprint. The low building footprint is inefficient and has the potential to create a lack of cohesion in the streetscape. The FSR of 2.3:1 control is resulting in a floor print and coverage which is less than the current DCP which provides guidelines for a 50% landscaping. The result of a 2.3:1 FSR is that it will not support efficient and feasible development and will result in an excess of poorly maintained and under-utilised ground level space. It also provides for an inefficient built form which is not supporting the character and vision for the area. In addition the proposed FSR will not support implementation of the vision outlined for the Showground Precinct of a height transition mechanism.

As such, it is necessary to increase the FSR for the built form in order to achieve higher density development in close proximity to the station, and allow for the most effective amalgamation of land in the precinct. This is particularly the case that the FSR needs to be commensurate with the heights in order that it would be possible to achieve all the provisions under SEPP 65 (Design Quality of Residential Flat Buildings). A FSR of 3.0:1 is therefore proposed in order that it can support the amalgamation of the sites outlined in this submission, as well as achieve a good built form, public realm and character.

Furthermore, in the Planning Study for the Showground Precinct, a map was provided that showed the relative walking distance to the new train station. See Figure 5.



Figure 5 Walking distance illustration – Showground Precinct Planning Study



Figure 4: Walking Catchment within the Study Area

We suggest that a planning control should allow heights of up to eight to ten storeys within the entire 10-minute walking zone, with a commensurate FSR to achieved building footprints of at least 50%. Planning controls should encourage the lower heights (six storeys) at the immediate transition, say 50-100m, of the R4 residential zone and the R3 Medium Density zone.

We believe this is essential to ensure the maximised usage of the substantial investment in public-transit infrastructure, and ensuring the largest number of people will have easy walkable access to the station. The rare opportunity of such significant public-transit upgrades, that once developed sterilises further opportunities for a substantial period of time, should be developed with a long-term view of optimising highly accessible housing opportunities.

3. Increasing pedestrian links, open space improvements and other public benefits

In reviewing the plans, there appears to be substantial opportunities south of Carrington Road to maximise the pedestrian links, further encouraging active transport combined with public-transit usage. Similarly, significant upgrades to open space are required.

We believed that it would enhance the development outcomes of the precinct if the Planning Proposal provides for opportunities to increase FSR and heights where public benefit is provided. This could be included as an additional clause in the Baulkham Hill LEP as a Local Provision.

The properties associated with the this submission neighbour Chapman Avenue Reserve, which will require significant upgrade to service new resident population. It may also be necessary to provide additional pedestrian connections between Dawes and Fishburn Crescent to create improved linkages across the Precinct. It is considered that the sites which are referred to in this submission, can provide those added benefits to the public, and therefore special consideration should be noted in the Planning Proposal regarding public benefits and associated FSR or height increases.

4. Showground Precinct Planning Proposal and Infrastructure

The Showground Precinct Planning Proposal provides a list of infrastructure that will likely be required to support the urban regeneration of the area. However, no indication of likely costs per dwelling or Net Developable Area is provided.



To support the orderly and timely delivery of infrastructure, potential developers should be aware of the likely contributions and the timing of delivery. As in other Priority Precincts, it is considered that broad costs and levies should be provided.

In addition, the infrastructure list does not outline the integration with the local facilities, and the extent of social facilities needed to support the regeneration. A local infrastructure strategy will be needed to support the new precinct, with a clearly defined timeline for delivery and likely contribution requirements. It is understood that this will be undertaken by the state government and Baulkham Hills Council. As a significant amalgamated lot within the Precinct, it is considered that discussions with us.

Covenants

Covenants and easements apply to the properties associated with this submission, and many are likely to impact most properties within the precinct.

To release, vary or modify these restrictions, consultation and negotiation is required to be undertaken with the Hills Shire Councils. Alternatively, a general legal mechanism should be considered during the Planning Proposal phase as per the Sydney greenfield Growth Centres.

Examples of these property restrictions include:

- » *Only one main building, a single private dwelling, may be constructed on each lot that was created as part of the original subdivision*
- » *The restriction does not prevent the dwelling from being used for the purposes of a medical practitioner or dentist*
- » *If a garage is to be built, it needs to be done so concurrently or following the construction of the main dwelling*
- » *The minimum area for the main dwelling of between 140sqm to 150sqm, excluding the garage and patio, with no walls being closer than 2m from the boundary of the lots*
- » *No paling fences are allowed*
- » *No front fence is allowed closer to the street than the front setback established by the Council*
- » *All roofs must be constructed with tiles*
- » *All electricity connections must be underground, and not from overhead powerlines.*

It is considered necessary that the Planning Proposal look at these covenants/restrictions holistically as it effects the entire area. The covenants could be dealt with as part of the Proposal rather than individual lot basis. A holistic approach could assist implementation of the Precinct vision more effectively.

Conclusion

The Showground Precinct represents a quality urban regeneration opportunity that needs to maximise patronage of the significant infrastructure investment the North-west Metro represents. It also encourages as many residents to utilise a combination of active and public-transit transport and utilise land resources as effectively as possible and facilitate the best urban outcomes in terms of infrastructure.

In this respect our submission recommends a number of changes to amend the Showground Precinct.



We appreciate the time taken to review this submission. Due to the significant land parcel this submissions covers and the importance of getting the structure of the Precinct in the most right, we request a meeting with yourself to discuss the proposal.

As the clients are working together to consider the future development of the lands, they reserve their right to make a further submission, if required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jenny Rudolph'.

Jenny Rudolph
Director
jenny@elton.com.au