



28 February 2016
Our Ref: 9331A.3WG

planning consultants

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

Dear Sir/Madam

**Exhibition of Showground Station Precinct Proposal
Properties in Middleton Avenue, Partridge Avenue and Ashford Avenue, Castle Hill**

1.0 Introduction

DFP has been engaged by a resident group that own properties in Middleton Avenue, Partridge Avenue and Ashford Avenue, Castle Hill. DFP has reviewed the Showground Road Station Precinct Proposal and the North West Rail Link Showground Road Station Structure Plan prepared by the NSW Department of Planning, dated September 2013 and make the following submission on behalf of the resident group. DFP previously prepared a submission to the Hills Shire Council in relation to the Hills Corridor Strategy in November 2015. A copy of that submission was sent to the Department of Planning and Environment (DoPE) and is attached to this submission.

Warwick Gosling of DFP has met with the residents group on 2 occasions to discuss the various plans exhibited and relationship with other planning strategies.

Our submission to the Hills Shire Council recommended that the subject site be subject to a height limit that ranged from 8 storeys to 5 storeys, with an 8 storey height limit along Middleton Road providing taller buildings along the access spine for the residential area to the station precinct.

The exhibited material proposes a height range of 6-8 storeys on the site and in this regard we broadly support the Showground Station Precinct Proposal. DFP did not support the Hills Council's position in the Hills Corridor Strategy that this area should be subject to a 96 dwelling per hectare density control that would have resulted in residential apartment buildings in the order of 3 storeys.

This conclusion is based upon the close proximity of the site to the proposed station being within 400 metres of the proposed Showground Railway Station with a maximum distance to the station being approximately 600 metres, the site being located on Middleton Road which is the main thoroughfare to the station. Council's 96 dwellings per hectare proposed density control does not provide the economic incentive for properties in this locality to be redeveloped.

We understand that the Hills Shire Council may be objecting to the Showground Station Precinct Proposal on the basis that there is additional dwelling yields than originally contemplated. It is our opinion that the building heights and typologies proposed by the DoPE on our client's land is appropriate and to reduce the building heights in this locality would result in poorer built form outcomes and, due to the high base cost of land, may make it uneconomical to redevelop.

2.0 Subject Site

The subject site comprises 25 individual allotments (see **Figure 1**) and includes the following sites:

- 17-39 Middleton Avenue (12 sites);
- 3-7 Ashford Avenue (3 sites); and
- 12-28 Partridge Avenue (10 sites).

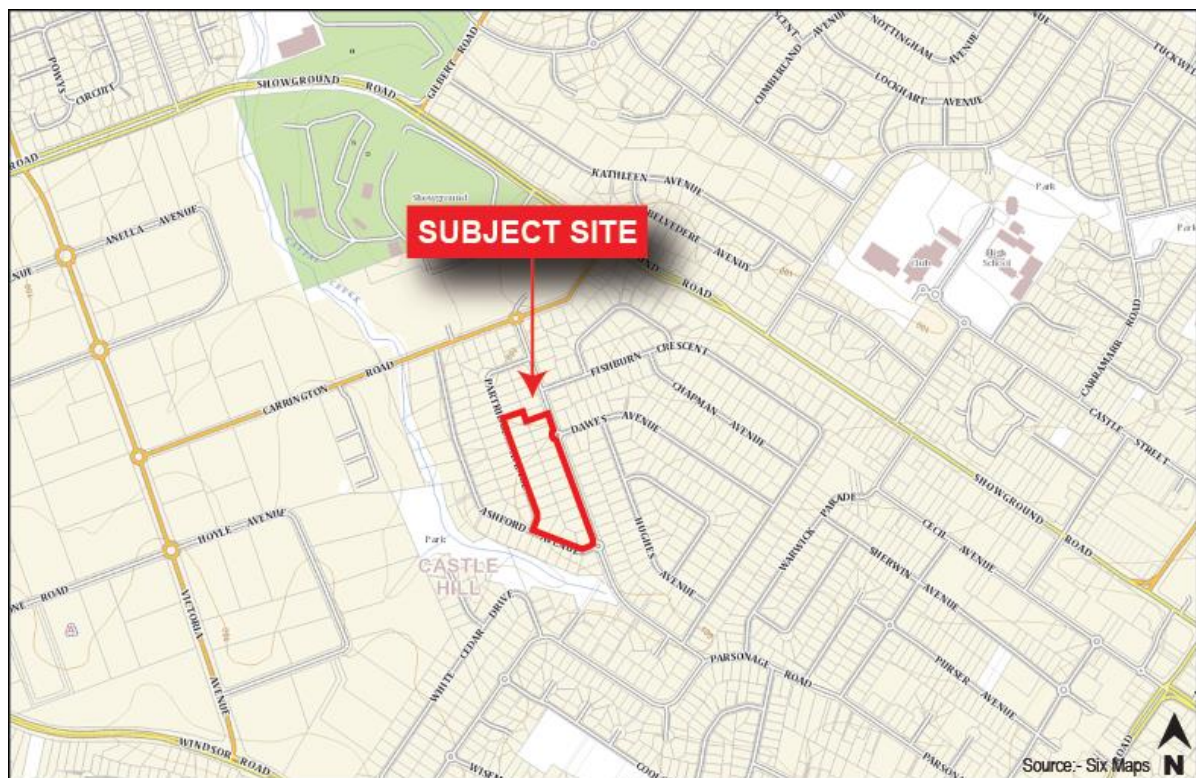


Figure 1: Locality Plan

The site is irregular in shape and has an area of approximately 2.5 hectares (see **Figure 2**).

Table 1 outlines the site's boundaries:

Table 1 Site Boundaries	
Eastern boundary to Middleton Avenue	288 metres
Southern boundary to Ashford Avenue	126 metres
Western boundary to Partridge Avenue	246 metres
Northern boundary to 15 Middleton and 10 Partridge	84 metres



Figure 2: Aerial Photograph

Each site contains a detached dwelling which is either one or two storeys in height. Dwellings along all three streets are generally setback 9-10 metres from the boundary and include street trees along the Council nature strip. Houses are similar in style and most appear to have been built in the 1980's, with some being newer in design. **Figures 3-6** show a variety of the dwellings that are located within the site.



Figure 3: No. 7 Ashford Avenue



Figure 4: No. 24 Partridge Avenue



Figure 5: No. 18 Partridge Avenue



Figure 6: No. 19 Middleton Avenue

Significant trees are present throughout the site. The majority of these trees are native species and vary in height. Trees are generally located within the rear and front yards of many of the allotments.

2.1 Surrounding Development

The site is located south of the proposed Showground Railway Station, the northern edge of the site is 250 metres from the station, while the southern edge is 550 metres from the station.

Middleton Avenue makes up the eastern boundary of the site and is the main vehicular thoroughfare for the immediate locality, acting as the main connector road for north/south traffic to the proposed Showground Station. Middleton Avenue has a road width of 10 metres and a width when measured from boundary to boundary of 20 metres (see **Figure 7**). A footpath is provided along the eastern side of the road.



Figure 7: Middleton Avenue, looking south

On the opposite side of the road, to the east are more residential dwellings similar in size and scale to the dwellings in the precinct. In addition to these dwellings, towards the northern side of the site, is the entry to Dawes Avenue, a local residential street.

Making the southern boundary of the site is Ashford Avenue, this street has a road width of 8 metres and a width when measured from boundary to boundary of 15 metres (**Figure 8**). Street trees are provided at regular intervals along Ashford Avenue which create a pleasant sense of enclosure.



Figure 8: Ashford Avenue, looking north west

On the opposite side of Ashford Avenue are detached residential dwellings which are similar in size and scale to the dwellings within the subject site. Behind these dwellings, further south, is Cockayne Reserve, a 6.7 hectare public open space reserve. The reserve includes a creek which runs north south, and connects to other creeks further north. This creek runs through the rear of several residential sites and divides the low density residential area from the light industrial area to the west. The reserve is accessed via Middleton Avenue and is approximately 80 metres south of the subject site.

Making the western boundary of the site is Partridge Avenue, this street has a road width of 8 metres and a width when measured from boundary to boundary of 15 metres (**Figure 9**). On the opposite side of Partridge Avenue are detached dwellings which are also similar in size and scale to the dwellings within the subject site.



Figure 9: Partridge Avenue, looking north from the Ashford Avenue/Partridge Road intersection

Further west of the existing low density residential area, on the opposite side of the creek that runs through Cockayne Reserve is the light industrial and business development area of Castle Hill. This area consists of large warehouses, storage facilities and bulky goods premises. This area is approximately 300 metres west of the site.

Directly north of the site is 15 Middleton Avenue (see **Figure 10**), and 10 Partridge Avenue. Both allotments contain a single storey detached dwelling constructed of brick.



Figure 10: 15 Middleton Avenue

Further north of the site is the proposed Showground Railway Station site. The station is currently under construction. Further north beyond the railway station is Castle Hill Showground. This site is regional private recreation space, however is generally open to the public. The site is used for various events throughout the year, including horse shows, community events, circuses, and large corporate events. The site includes grandstands, car parking and historic buildings (**Figure 11**).



Figure 11: The Castle Hill Showground

The subject site is approximately, 250 metres from the railway station, and 550 metres from Castle Hill Showground.

3.0 Exiting Environmental Planning Instruments

3.1 The Hills Local Environmental Plan 2012

The land that forms the subject site is currently zoned R2 Low Density pursuant to The Hills LEP (see **Figure 12**). The subject site has a maximum height limit of 9 metres (see **Figure 13**). No FSR Limit applies to the site

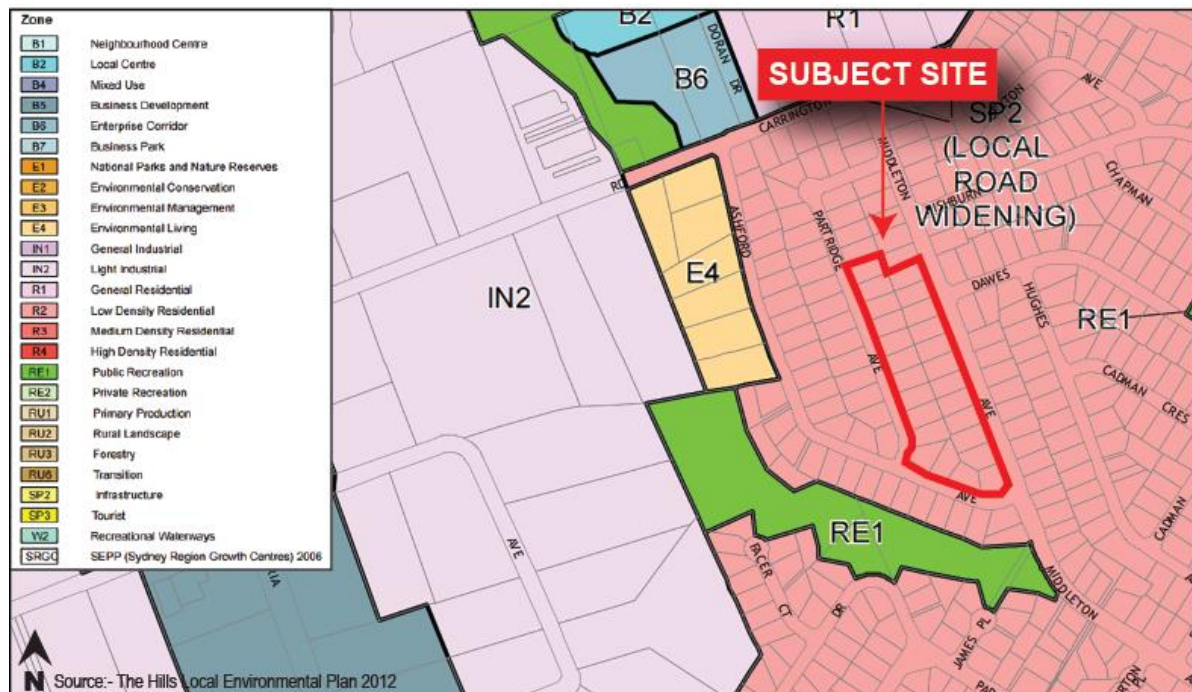


Figure 12: Zoning Map Extract (THLEP 2012)

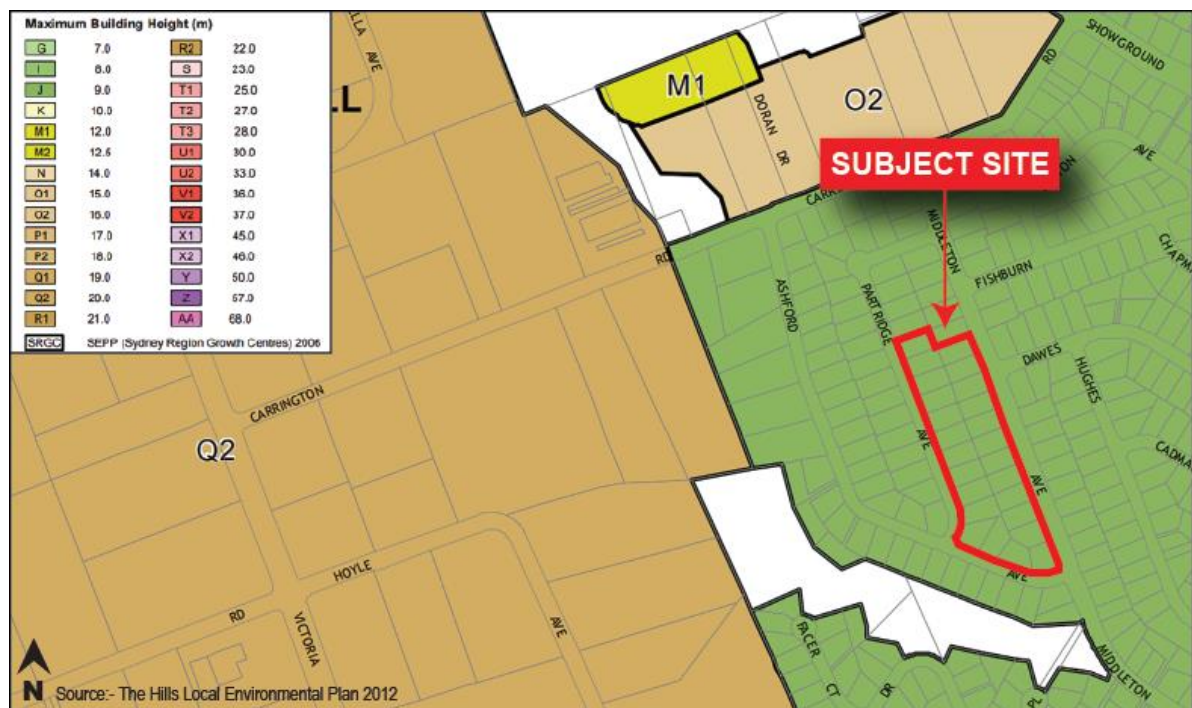


Figure 13: Building Height Map Extract (THLEP 2012)

Accordingly the current existing highest and best use of this site is residential development in the form of 2 storey dwelling houses. Notwithstanding, other development forms that may also be permissible by various State Environment Planning Policies that are not relevant to this submission.

3.2 North West Rail Link Showground Road Station Structure Plan 2013

The Showground Road Structure Plan undertook an exercise of opportunities and constraints and mapping to determine what sites were appropriate for higher density residential development to reflect the precinct's proximity to the proposed Showground Railway Station.

The subject site did not contain any constraints. Given that the dwellings on the subject site reflect the highest and best use, these properties, at present, cannot be redeveloped under the existing controls to an extent that would have a significant impact on providing new housing opportunities in the locality. Accordingly, the Showground Road Station Structure Plan identified the subject site as being located in an area nominated as an "opportunity for growth".

The Structure Plan identified that all exiting residential areas south of Carrington Road would be capable of accommodating medium density residential development. The Showground Road Structure Plan identifies medium density apartment living as comprising 3-6 storey apartment buildings. Medium density residential was proposed for all areas located within 400 metres and 800 metres from the railway station.

3.3 The Draft Hills Corridor Strategy

The Hills Corridor Strategy provides recommended density controls for residential properties in the Showground Precinct.

Figure 8.3 of the strategy identifies land on the south eastern side of Carrington Road, including the subject site, as being appropriate for high density residential development. This opportunity mapping is then translated into density controls. Land on the northern side of Fishburn Crescent was identified as having a density of 144 dwellings per hectare and land to the south east of Fishburn Crescent identified as 96 dwellings per hectare. The subject site is listed as having a residential density of 96 dwellings per hectare. Given that the subject site has a total area of 24,576m², this would equate to 235 dwellings for the site.

Our clients have had discussions with Jones Lang Lassalle, who indicated that with a density of 96 dwellings per hectare a developer would not be in a position to purchase land in the Precinct as the land values for a dwelling house exceed the value of the land as a development site. Accordingly, they are of the opinion that the proposed density will not result in these properties being redeveloped for residential apartments.

4.0 Response to the Showground Station Precinct Proposal

As indicated in the Introduction DFP broadly support the proposed building heights and typologies proposed in the DoPE Showground Station Precinct Proposal. Residential flat buildings with heights of 6-8 Storeys are considered appropriate for the following reasons;

- Middleton Avenue is the main vehicular and pedestrian thoroughfare through the residential Precinct to the railway station, thereby providing direct pedestrian access to the station.
- The subject site is a consolidated parcel of land with an area of 24,576m² with 3 road frontages.
- Residential opportunities within the entire Precinct area are limited, as the land to the west is employment land and land to the north is the Showground site.
- Middleton Avenue has a width from property boundary to property boundary of 20 metres, whilst Partridge Avenue and Ashford Avenue have widths from property to property boundary of 15 metres.

- The majority of the site is located within the 400 metre radius of the station with the southern extremity being 550 metres from the station. The southern extremity is still within a comfortable 10 minute walk to the railway station due to its direct pedestrian access.
- The Precinct currently has high quality housing stock, thus increased residential densities will be required to provide an economic incentive for these areas to be redeveloped for apartments,
- Planning for the Precinct needs to ensure that there is not a large height differential between the development at the station and other adjoining sites, especially within the 400 metre radius of the railway station.

4.1 Zoning

The proposed R4 zone to permit with consent residential flat buildings is supported.

4.2 Building Heights

In our submission to The Hills Shire Council on the Draft Corridor Strategy we had proposed that building heights of 8 storeys be provided along Middleton Avenue to create a built form response to the vehicular and pedestrian spine along Middleton Road. The building height would taper back to 5 storeys along Partridge Avenue. This approach was considered to provide a built form that led people to the station along the main spine to improve the legibility of the station precinct. Once on the spine of Middleton Road the 20 storey buildings at the Station precinct centre would draw people to the core.

The proposal on exhibition has provided a different built form approach with the height tapering back from the station rather than the main access spine. We understand the urban design philosophy of that approach and consider it to be sound.

Accordingly we support the proposal for a range of building heights from 6-8 Storeys across the site.

4.3 Floor Space Ratio.

We note that the floor space ratio map and the building height map do not correlate for properties in Middleton Avenue and Partridge Avenue. We understand that this may be partly due to the proposal to extend Fishburn Avenue through to Partridge Avenue.

In this regard the 27m height limit (T2) extends 7 properties south of northern extent of Partridge Ave, whilst the 2.7:1 FSR limit (U) only extends 3 properties south of the northern extent of Partridge Ave. This is illustrated in **Figure 14** and **15** below.

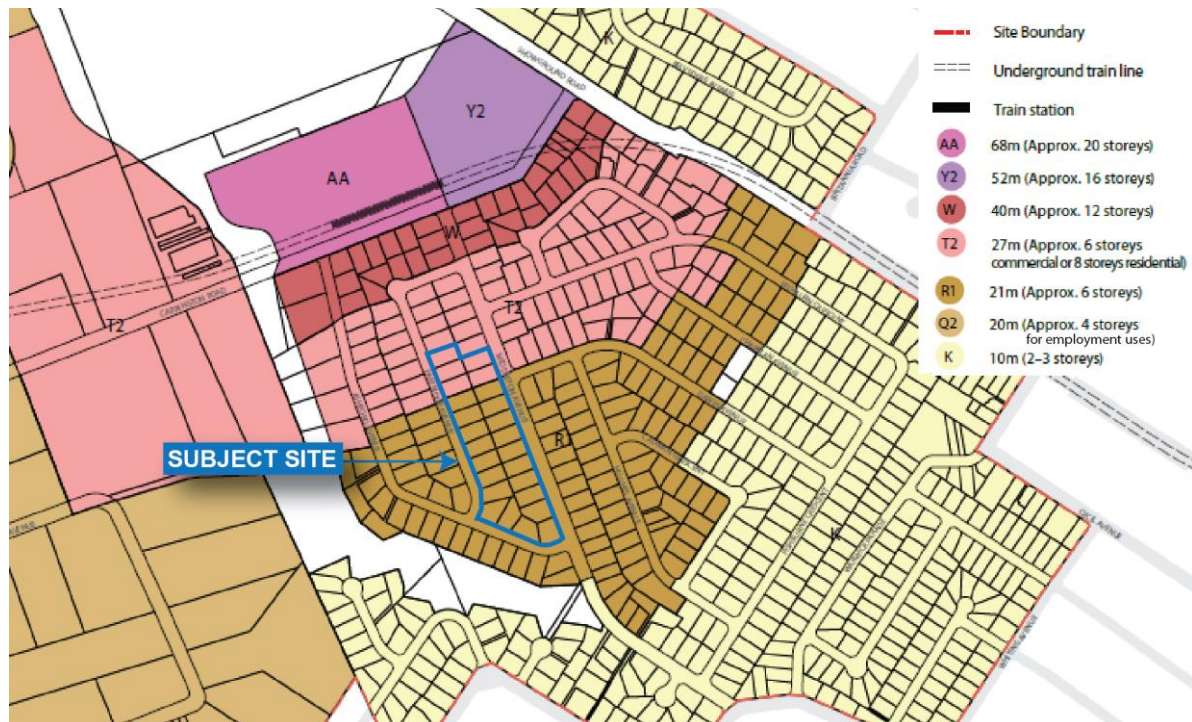


Figure 14: The height control proposed in the Showground Station Precinct Proposal

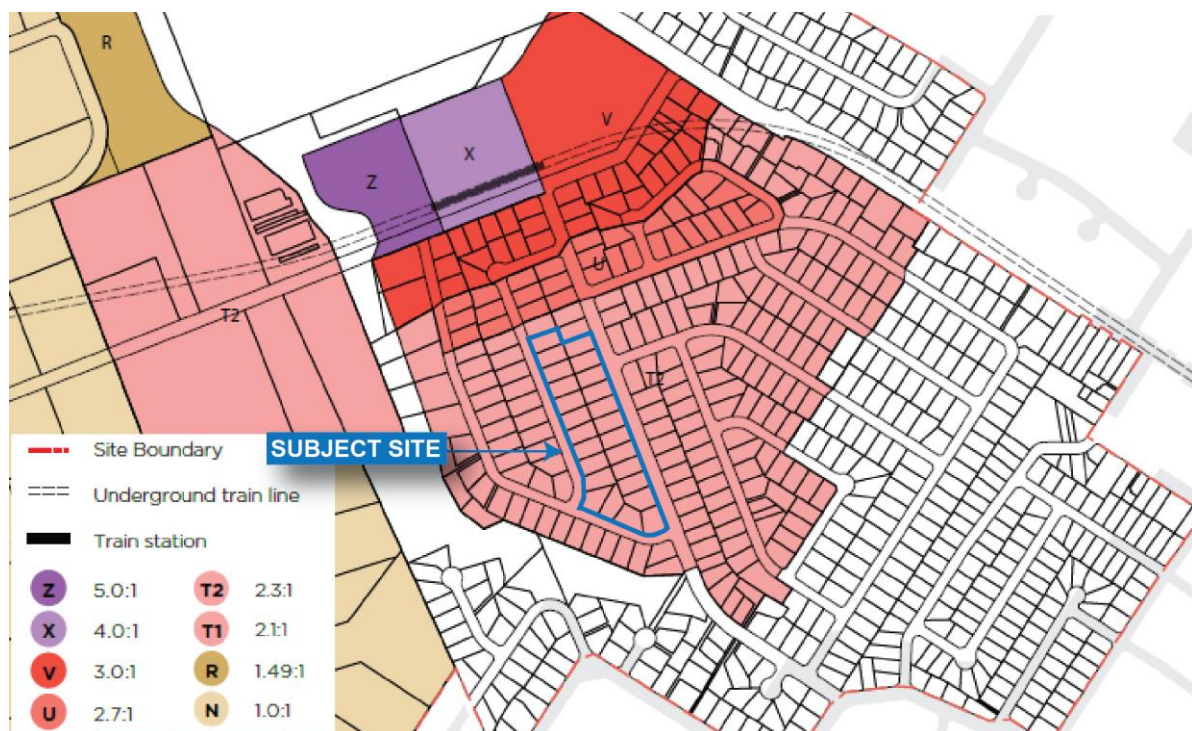


Figure 15: The FSR control proposed in the Showground Station Precinct Proposal

The outcome of this is that there are 5 properties with a height limit of 27 metres with a FSR of 2.3:1, where the other properties that have a height limit of 27 metres have a FSR of 2.7:1.

As indicated this resident group have a marketing agreement with Jones Lang Lassalle and it is likely that the whole site would be sold to a developer. The larger the development site the better opportunities exist for the provision of larger consolidated open space areas to be provided. It becomes complicated in a development scenario on a consolidated block where

parts of the site have a FSR that does not correlate with the height limit. This makes the design and assessment complicated.

It is recommended that the height limit matches the FSR. Other factors such as solar access, privacy and building separation issues will ultimately dictate the form of development on the edge of the height transition. Reducing the FSR over complicates this situation. As espoused in the exhibited Planning Report and in the Land and Environment Court Planning Principal “maximum heights and FSRs are not as of right”

It is therefore recommended that the 2.7:1 FSR control (U) be extended to the south to match the 27 metre height limit. This approach should also be taken to the properties on the eastern side of Middleton Road in Fishburn Avenue (see **Figure 16**).

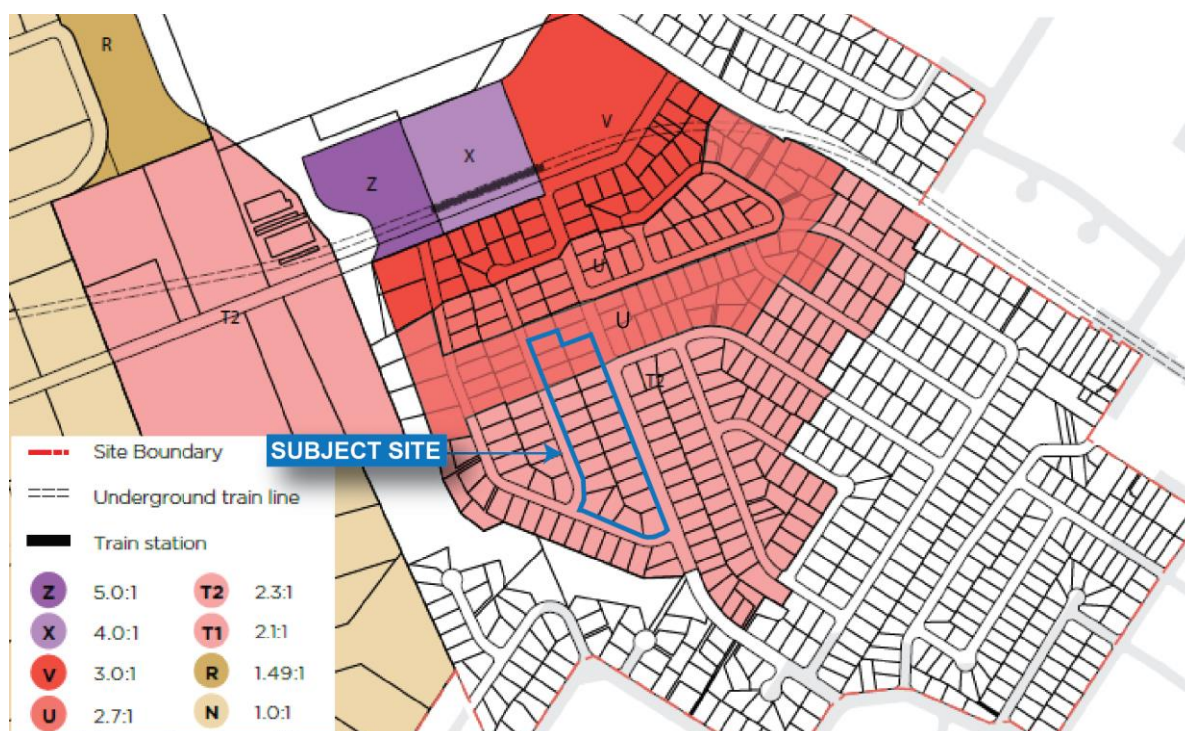


Figure 16: The amended FSR boundary proposed in this submission

4.4 Dwelling Yields

We would not support a reduction of the building heights or Floor Space Ratios for this site. From discussions with Jones Lang Lassalle any further reduction of yield may make it economically unviable in the short to medium term for the high quality residential dwellings on lots of approximately 1000m² to be purchased for development. Accordingly we do not support the Hills Shire Council's exhibited Corridor Strategy which proposed 96 dwellings per hectare which equates to approximately 3 storey residential flat buildings.

It is our recommendation that should the DoPE be convinced by Council the development yield for the entire precinct was too high that the DoPE reconsider the new residential areas in the R1 zones on the western side of Cattai creek in the current employment lands as opposed to reducing yields in areas such as Middleton and Partridge Avenue.

4.5 Road Pattern

We do not see the benefit of extending Fishburn Crescent to Partridge Avenue to create a straight road across Middleton Avenue as proposed on Page 23 of the Precinct Plan. Currently access is available to from Middleton Avenue along Partridge Avenue, the bend in the road

assists in reducing traffic speeds. The resultant road creates a small development parcel on the northern end of the site, which would benefit if it were consolidated with the properties to the south.

The extension of Fishburn Crescent through the subject site creates an additional intersection on Middleton Avenue within 50 metres of the existing intersection of Partridge Avenue. The new road access is not required to facilitate access from Middleton Ave to Partridge Ave as this link already exists.

5.0 Conclusion

This submission is written by DFP Planning on behalf of the residents of Middleton, Partridge and Ashford Avenue as identified in the site plan. This submission has demonstrated that the group is motivated to sell/develop their land in one consolidated block which provides opportunities for taller buildings with larger building separation distances being achieved.

DFP broadly support the proposed height limits as proposed by the State Government, however recommend that the FSR map reflect the height limit map. In this regard the areas that have a 27 metre height limit should be provided with a 2.7:1 FSR.

Furthermore we do not see the need to extend Fishburn Crescent across Middleton Avenue to connect with Partridge Avenue when Partridge Avenue already intersects with Middleton Avenue approximately 50 metres to the north of the proposed intersection. The road is additional public infrastructure which is not required to access properties or potential development sites. This proposed extension of Fishburn Crescent will create a small development site which would be better amalgamated with properties to the south to create a larger consolidated development site.

The advice from James Lang Lassalle is that the density of 96 dwellings per hectare proposed by the Hills Shire Council do not provide the economic incentives for redevelopment due to the high quality of residential properties currently occupying these sites. Without the economic incentive to redevelopment these properties will remain as dwelling houses in the long term.

DFP supports the opportunity provided in the Showground Road Station Precinct to create a vibrant urban area within the Showground Road Precinct that provides opportunities for taller residential flat buildings up to 8 storeys in height transitioning back from the station on large consolidated lots.

DFP trusts that the information contained in this submission provides The DoPE with the information it requires to ensure that this Precinct is redeveloped to the high standard. Should there be any further queries, please do not hesitate to contact Warwick Gosling on 9980 6933.

Yours faithfully
DFP PLANNING PTY LIMITED



WARWICK GOSLING
DIRECTOR

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Reviewed: _____

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Encl. 1. Previous Submission made for The Hills Corridor Strategy