



25 February 2016  
Our Ref: 9398A.3WG

planning consultants

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

Dear Sir/Madam

**Submission on Exhibition of the Showground Station Precinct Proposal  
Properties in Showground Road, Belvedere Avenue, Kathleen Avenue and Britannia  
Road Castle Hill**

**1.0 Introduction**

DFP has been engaged by a resident group that owns properties in Showground Road, Belvedere Avenue, Kathleen Avenue and Britannia Road Castle Hill to review the Showground Station Precinct Proposal which has been prepared by the Department of Planning and Environmental (DoPE) and if warranted, make a submission. This precinct group has become identified as the "SBKB Boot Precinct". The names and address of members of this resident group are attached at **Attachment 1** of this submission.

In preparing this submission, DFP has reviewed The Draft Hills Corridor Strategy prepared by The Hills Shire Council (Council) and the Norwest Rail Link Showground Station Structure Plan prepared by the DoPE, dated September 2013 and the currently exhibited Showground Station Precinct Proposal.

Warwick Gosling of DFP has met with the resident group on 3 occasions to discuss the implications of the various strategies on their properties.

Warwick Gosling of DFP prepared a submission on behalf of this resident group to The Draft Hills Corridor Strategy in November 2015 which sought to rezone the subject site from its proposed R3 Medium Density Residential zone to R4 High Density Residential. A copy of this submission is attached at **Attachment 2** of this letter. This letter was also forwarded to the DoPE in November 2015.

For the reasons demonstrated in this submission, it is the conclusion of DFP that it is appropriate for land within this precinct to be zoned for residential apartment buildings generally ranging in height from 5 to 8 storeys with a 12 storey marker building located on the corner of Showground Road and Britannia Road which delineates the entry into the Showground precinct. A Site Analysis Plan is attached at **Attachment 3** whilst an envelope study is attached at **Attachment 4** which justifies the recommended built form.

It is noted that the Showground Road Station Structure Plan prepared by the DoPE in September 2013 recommended that residential apartment buildings be accommodated on the site with heights of up to 6 storeys. The current DoPE exhibited proposal has increased the height of buildings in the core up to 20 storeys. Therefore a height range of 8 to 5 storeys with a 12 storey marker is considered to provide a transition in height across the precinct.

A petition has been signed by 103 of the 110 Residents in the Showground/Belvedere and Kathleen Avenue Precinct all in support of allowing residential apartment buildings in this precinct. We understand that there are 4 resident groups in this precinct that have all lodged

submissions as part of this exhibition. We would request that the Department of Planning meet with the various groups collectively to determine the best planning outcomes for this precinct.

## 2.0 The Site

The site is located approximately 400 metres from the new Showground Road Railway Station. The site is also approximately 740 metres from Castle High School, Castle Bowling Club and Castle Hill RSL and approximately 1.5km from Castle Towers and Castle Hill Town Centre.

The site comprises 32 properties on Showground Road, Britannia Road, Kathleen Avenue and Belvedere Avenue. Details of the individual properties are provided at **Attachment 1**. The site has a total area of approximately 3.13 hectares. The site has the following boundaries:

- 321 metre frontage to Showground Road,
- 156 metre frontage to Britannia Road,
- 76 metre frontage to Kathleen Avenue; and
- 333m frontage to Belvedere Avenue.

A pedestrian pathway connects Belvedere Avenue to Showground Road and is located between 30 and 32 Belvedere Avenue and 116 and 118 Showground Road. A locality plan is shown at **Figure 1** and aerial photograph is provided at **Figure 2**.

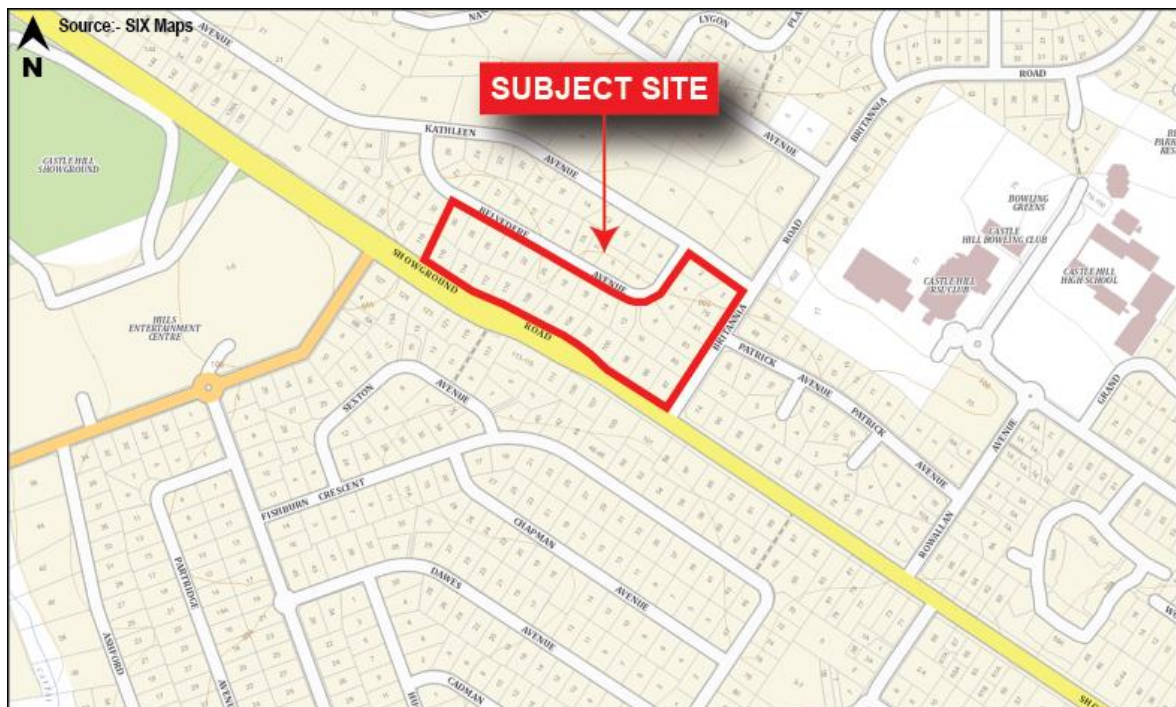


Figure 1: Locality Plan



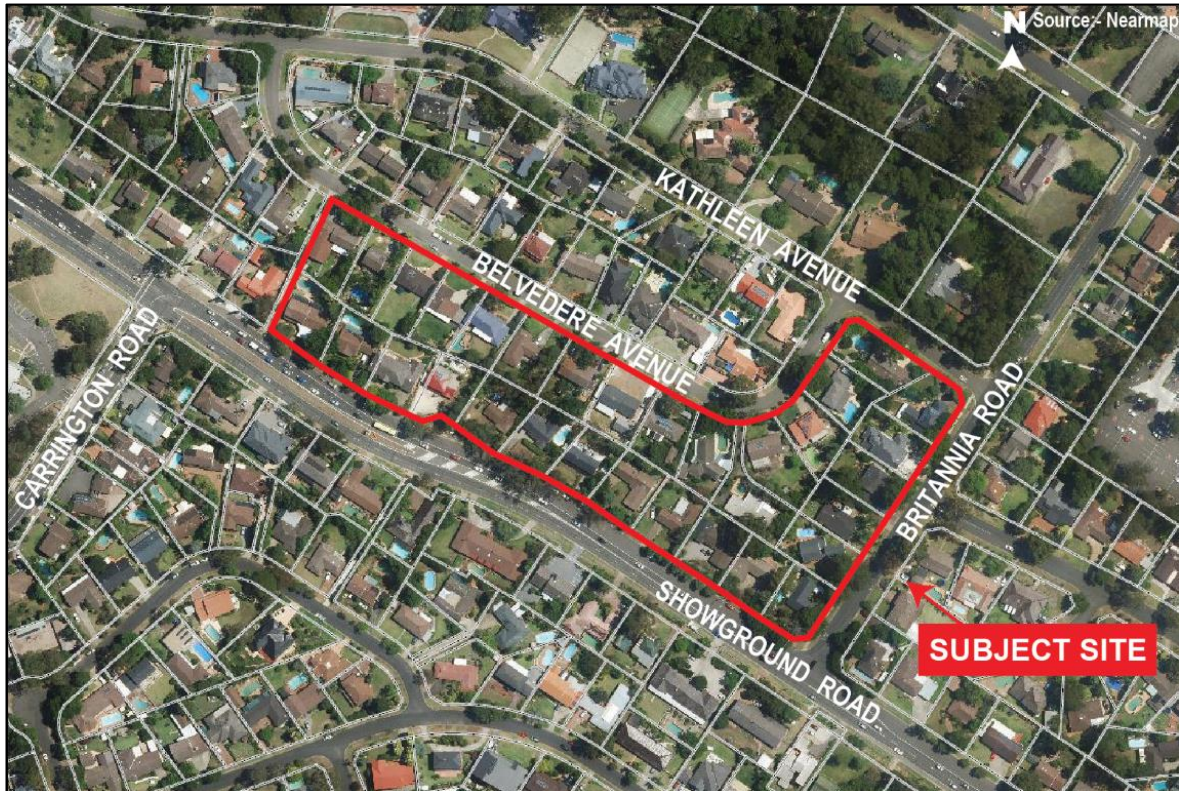


Figure 2: Aerial Photograph

The properties within the site are predominantly 1 and 2 storey detached residential dwellings of varying ages. One property at 98 Showground Road is currently used as a Dental Practice. The properties have landscaped gardens, with numerous mature native and exotic trees planted throughout the site. The locality contains high quality and well maintained dwelling houses.

The surrounding neighbourhood is a low density residential area comprising a mix of one and two storey dwellings, with some non-residential uses along Showground Road including medical and dental practices. The Castle Hill Showground is located approximately 450 metres to the northwest of the site.

Photographs of the site are shown at **Figures 2 to 8**.





*Figure 3: Dwelling on Showground Road*



*Figure 4: View south east along Showground Road*





*Figure 5: View north along Britannia Road*



*Figure 6: View west along Kathleen Avenue*





*Figure 7: View along Belvedere Avenue*



*Figure 8: Dwellings on Belvedere Avenue*





Figure 9: Pedestrian Laneway connecting Belvedere Avenue to Showground Road

### 3.0 Existing Planning Controls and Strategies

#### 3.1 The Hills Local Environmental Plan 2012

The site is located in the Hills Local Government Area and has the following key standards applying to the site:

- Land Use Zoning – R2 Low Density Residential
- Maximum Height Limit – 9 metres

The existing highest and best use of land in this precinct under the current zoning is residential dwelling houses with the predominant built form being 2 storey dwelling houses with pitched roofs. Other land uses are permitted through other State Environmental Planning Instruments, however they are not relevant to this submission.

#### 3.2 North West Rail Link Showground Road Station Structure Plan September 2013

The DoPE and NSW Department of Transport prepared the Showground Road Station Structure Plan which was released in September 2013. It provided a vision for the Showground Road Station locality which includes the subject site. This document provided a Structure Plan for the locality based on opportunity and constraint mapping.

This document identified that the subject site was not affected by any development constraints.

The site was identified as a short term opportunity site and accordingly the subject site was identified as being appropriate for medium density residential development. Medium density residential is defined in the Structure Plan as being residential apartments ranging in height from 3 to 6 storeys.

### 3.3 The Hills Corridor Strategy 2015

The Hills Corridor Strategy was prepared by Council in November 2015 and undertook an opportunity and constraints mapping exercise which culminated in a residential density plan.

The Hills Corridor Strategy did not find any constraints to development on the subject site. It recognised the pedestrian link that joins Kathleen Avenue to Showground Road which forms the north western boundary of the subject site as a site opportunity.

Despite not finding any constraints for the site, the Hills Corridor Strategy identified the subject site and all land within the Precinct on the north eastern side of Showground Road as being appropriate for townhouse/terrace development which has a density of 39 dwellings per hectare.

### 4.0 The Showground Station Precinct Proposal December 2015

The Showground Station Precinct proposal prepared by the DoPE in December 2015, proposes to zone the subject site R3 Medium Density Residential pursuant to the THLEP 2012. The R3 Medium Density Zone allows townhouses and villas as the highest and best use. **Figure 10** shows the exhibited land use zoning plan.

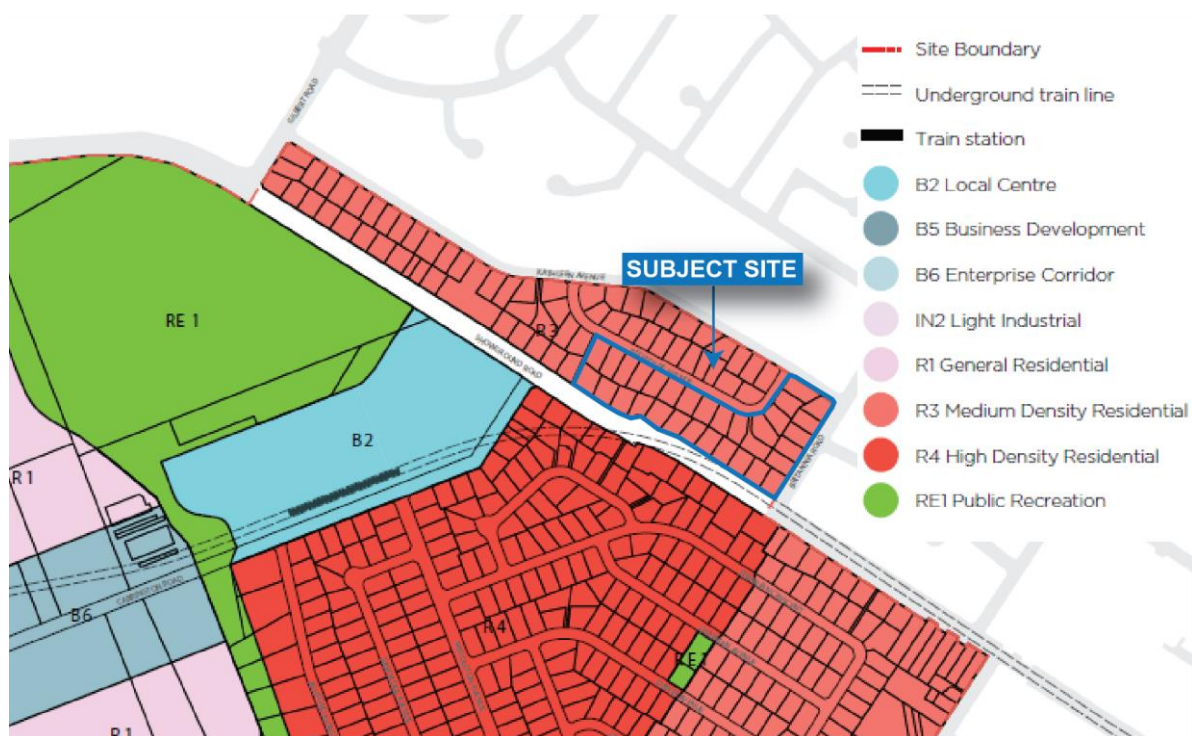


Figure 10: Exhibited zoning under the Precinct Proposal

The proposed height for the subject site is 10 metres and is described as 2-3 storeys.

No floor space ratio (FSR) has been established for the R3 zone as part of the Showground Station Precinct Proposal. Therefore it is anticipated that the provisions of The Hills Local Environmental Plan 2012 would apply. No FSR applies to land within the R3 Medium Density Residential Zone in The Hills Shire.

It is not clear as to the reasons why the DoPE has sought to zone the subject site R3 Medium Density when the 2013 study indicated that the site was appropriate for residential apartment buildings between 3-6 storeys in height. On page 23 of Volume 1 of the Showground Station Precinct Planning report, the report states that there are some differences in the proposed land



uses compared to the Structure Plan finalised in 2013. There are 3 reasons stated, however none relate to the down zoning of the subject site. Moreover, bullet point 2 states the following:

*“The urban design analysis found that there is greater capacity for more homes close to the station, subject to appropriate design controls, as recommended to be adopted into The Hills Development Control Plan 2012;”*

There are areas within the subject site that are approximately 250 metres from the railway station and all of the site is within 800 metres of the railway station. In comparison there are areas to the south of the proposed station that are proposed to be zoned R4 that are indeed further away from the station compared to all of the properties on the subject site.

It is considered that zoning the subject site R3 is inconsistent with the visions and principles for the Showground Station Precinct. Providing 2-3 storey townhouses on the site that is directly opposite land that has a height limit of 12 storeys, 8 storeys and 6 storeys, does not provide the height transitions that the Showground Station Precinct is trying to achieve. The proposed height map currently on exhibition is provided below at **Figure 11**, which shows the height variations across the Precinct.

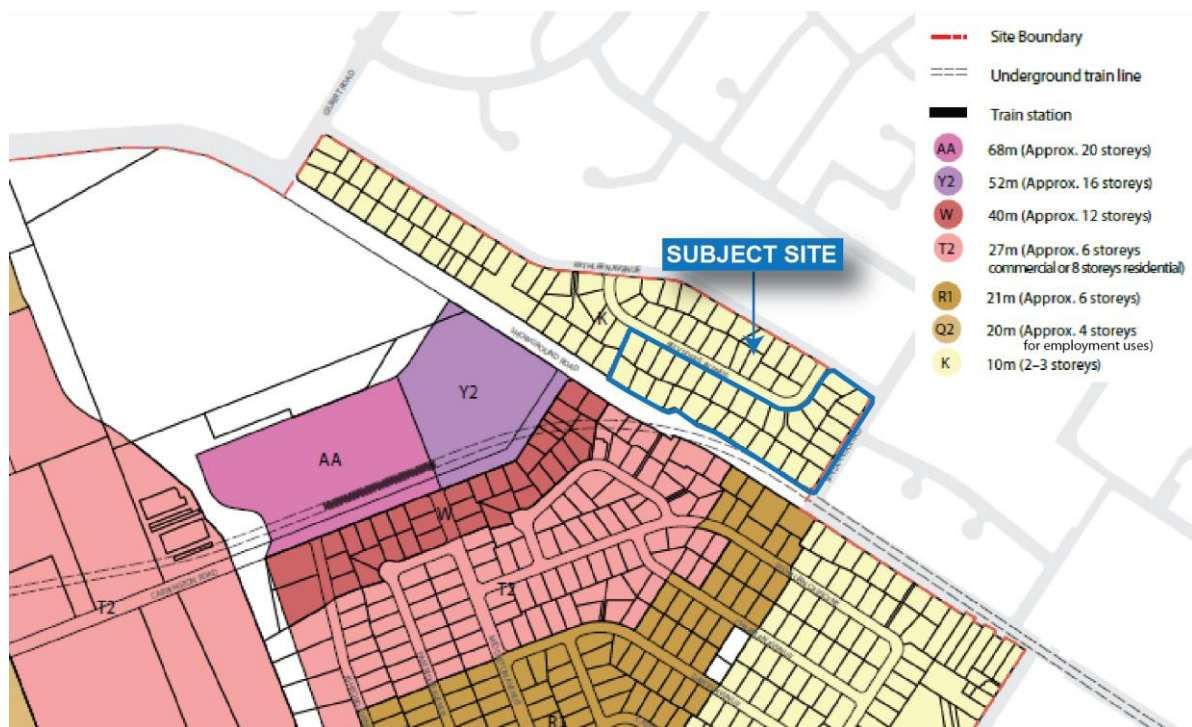


Figure 11: Exhibited Height Map

The lack of height transition is abundantly clear in **Figure 12** of the Showground Station Precinct Planning report which shows the proposed residential apartment buildings on the western side of Showground Road opposite the subject site which has heights of 2-3 storeys. This results in a height change of between 9 and 10 storeys.

## 5.0 Opportunities and Constraints Investigation

To establish the most appropriate use, zoning and heights for the site DFP has prepared a site plan with the Opportunities and Constraints plan which is provided at **Attachment 3** to this submission. The opportunities of the site are considered to be as follows:

- Approximately 30% of the subject site is within a 400 metre radius of the proposed Showground Road Station.

- The site is bounded by Showground Road, Britannia Road, Kathleen Avenue, Belvedere Avenue and the pedestrian path. Accordingly, the site does not have an interface with other residential properties, thus forming a logical large consolidated development site.
- There are only 3 land owners within the subject site that have not agreed to be part of the resident group. DFP have been advised that these land owners do not object but do not want to actively participate in this submission. Accordingly the land owners are motivated to seek the redevelopment of their land.
- The configuration of the subject site allows vehicular access to be obtained from roads other than Showground Road. Due to the topography of the land which slopes down to the north, it would be logical for vehicular access to development to be obtained from Belvedere Avenue.
- The subject site occupies the eastern entry point into the Showground Station Precinct. Accordingly it is the opinion of DFP that it is appropriate to provide a marker building that delineates the entry into this Precinct. Therefore it is appropriate to consider planning for a tall slender marker building to be located on the intersection of Showground Road and Britannia Avenue.
- Due to the slope of the land, drainage of the site would occur through Kathleen Avenue and Belvedere Avenue. The orientation of the block is favourable given its large north facing exposure.
- Providing residential apartment buildings along Showground Road will act as an acoustic barrier to the traffic noise generated from Showground Road which is an arterial road. Any future development along Showground Road will need to be acoustically treated to ensure compliance with the State Environmental Planning Policy (Infrastructure).

DFP also identified several issues that needed to be overcome to provide the best and most logical development outcome for the site. These issues were:

- Provide appropriate building height transitions from Showground Road to the periphery of the Precinct.
- Noise generation from Showground Road
- Vegetation on the site and street trees along Britannia Avenue and Belvedere Avenue.

## 6.0 Recommended Development Scenario

Based on the findings of this opportunity and constraints study, Brian McDonald (Principal Urban Designer) of DFP has prepared an envelope study this is included at **Attachment 4**. This study adopts the following criteria and principals:

- A 10 metre front setback to Showground Road, Britannia Avenue, Kathleen Avenue, Belvedere and the pedestrian path that links Kathleen Avenue to Showground Road. This setback would enable the widening and/or integration of that pedestrian connection to be incorporated onto the site. The 10 metre setback is consistent with the existing setback controls in the Hills DCP – Residential Apartment Buildings. This will assist in preserving mature trees within the existing front yards of the dwellings



- Buildings are 'L' shaped and are orientated predominantly north east, south west to allow solar access penetration.
- The depth of the site between Showground Road and Belvedere Avenue enables building platforms which would provide street addresses to apartments to both Showground Road and Belvedere Avenue.
- The maximum building width of each portion of the 'L' Shape is 30 metres;
- Due to the width of Showground Road, it is appropriate to provide higher buildings along this interface given that approximately 50% of the Showground Road frontage is within 400 metres of the railway station.
- A transition in height down to 5 storeys is considered appropriate along the Belvedere Avenue and Kathleen Avenue frontages to provide a height transition to other land on the periphery of the Precinct.
- The opportunity exists to provide a tall slender marker building at the intersection of Showground Road and Britannia Avenue. This marker building would provide an entry feature into the Showground Precinct that creates a sense of arrival into this exciting precinct.
- The height transitions with 5 storeys at the north and 8 storeys to the south promotes solar access opportunities by maximising north facing apartments.
- Building separation distances of 18 metres are proposed in accordance with the Apartment Design Guide for buildings ranging in height from 8 to 5 storeys.
- The land slopes down to the north by approximately 3 metres, which promotes increased solar access penetration into the units on the higher part of the site to the south.

This proposal provides the economic incentive to enable the existing large and high quality dwelling houses on the subject site to be redeveloped.

It is highly unlikely that a zoning that allows townhouse development as the highest and best use on the site would be economically viable due to the existing high cost of properties in this locality. There will need to be a significant incentive for dwellings on the site to be developed. Existing residents living in high quality dwellings in the locality may be encouraged to remain living in their dwellings, enjoying the convenient access to the railway station if development incentive is not there. It is highly unlikely that over the life of this plan, i.e. 20 years, that the economic cycle would result in it being economically viable for the subject site to be redeveloped for townhouse development.

By providing taller buildings with 18 metre separation distances, there are greater opportunities for ground level consolidated open space areas for the use of residents. It is especially important that large consolidated open space areas are provided on sites if Council is seeking to encourage younger families to move into apartments.

Smaller residential apartment buildings, or indeed townhouse developments, do not provide the opportunities for large consolidated ground level open space as separation distances are smaller which results in larger site coverage.

In terms of converting the envelope study into a density control, it is anticipated that the envelope study would provide approximately 524 apartments based on 8 dwellings per floor

with the exception of the marker building where a combination of 4, 6 and 8 apartments would be provided per floor.

This would equate to a floor space ratio of 2.7:1.

DFP has prepared an indicative development envelope scheme which is provided at **Attachment 4**. It demonstrates how buildings on the site which range from 5-8 storeys with a 12 storey marker building can be accommodated on the site change regard to the SEPP 65 Apartment Design Guide and providing a height transition from the station.

**Attachment 4** also includes images based on a SketchUp model of the precinct which was prepared by DFP for this submission. The model took into consideration:

- The heights of the buildings in storeys, converting this to a 3 metre floor to ceiling height for each storey;
- The slope of the land; and
- The built form overview proposed on page 23 of The Precinct Proposal.

The images show three examples of how the proposed heights provided in the DoPE Proposal provide a height transition from the core to the precinct boundary. These images are compared to the height transitions proposed in the DFP Design.

## 7.0 Recommended Amendments to the Showground Station Precinct Proposal

In order to facilitate a development concept consistent with that shown at **Attachment 4** of this submission, it is recommended that the following amendments be made:

Amend the zoning to R4 High Density zone as shown below.

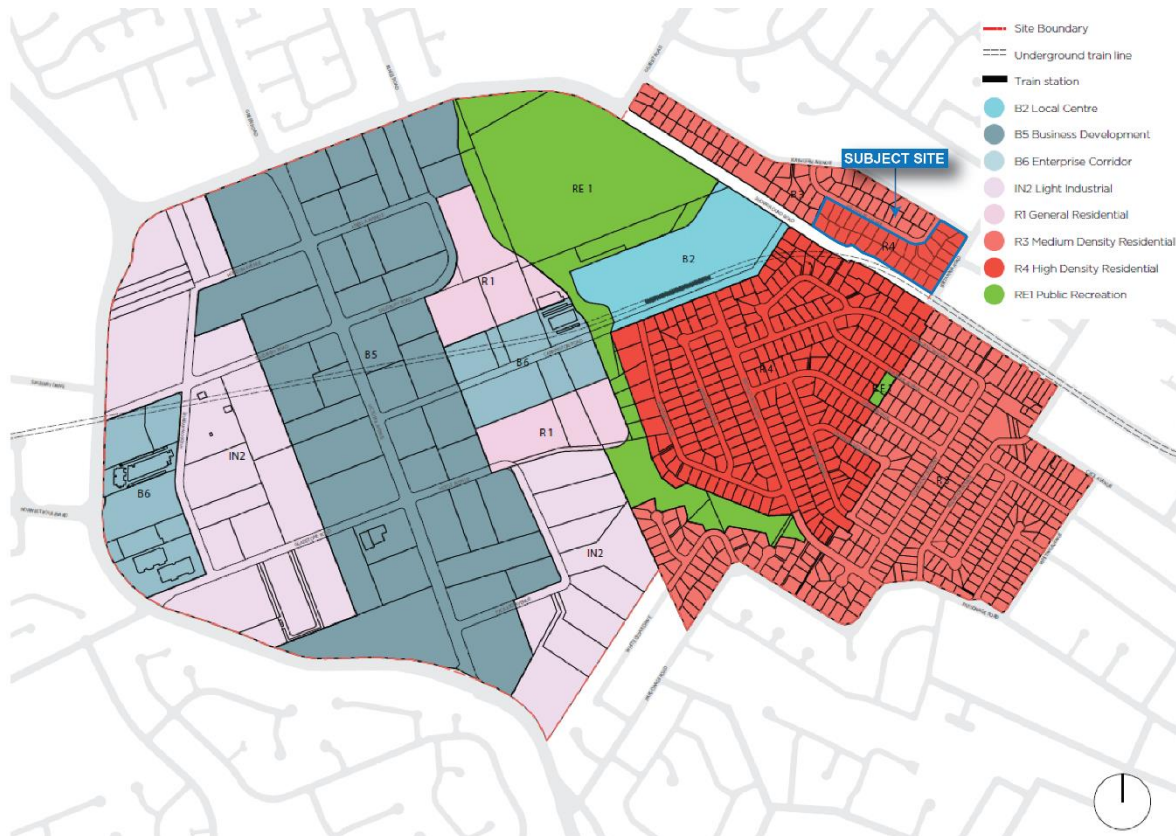


Figure 11: Proposed zoning map



Amend the height map to allow a marker building up to 12 storeys in height on the corner of Britannia Road and Showground Road with a height limit of 40 metres. The remainder of the site would have a height limit to allow up to 8 storeys with a proposed height of 27 metres.

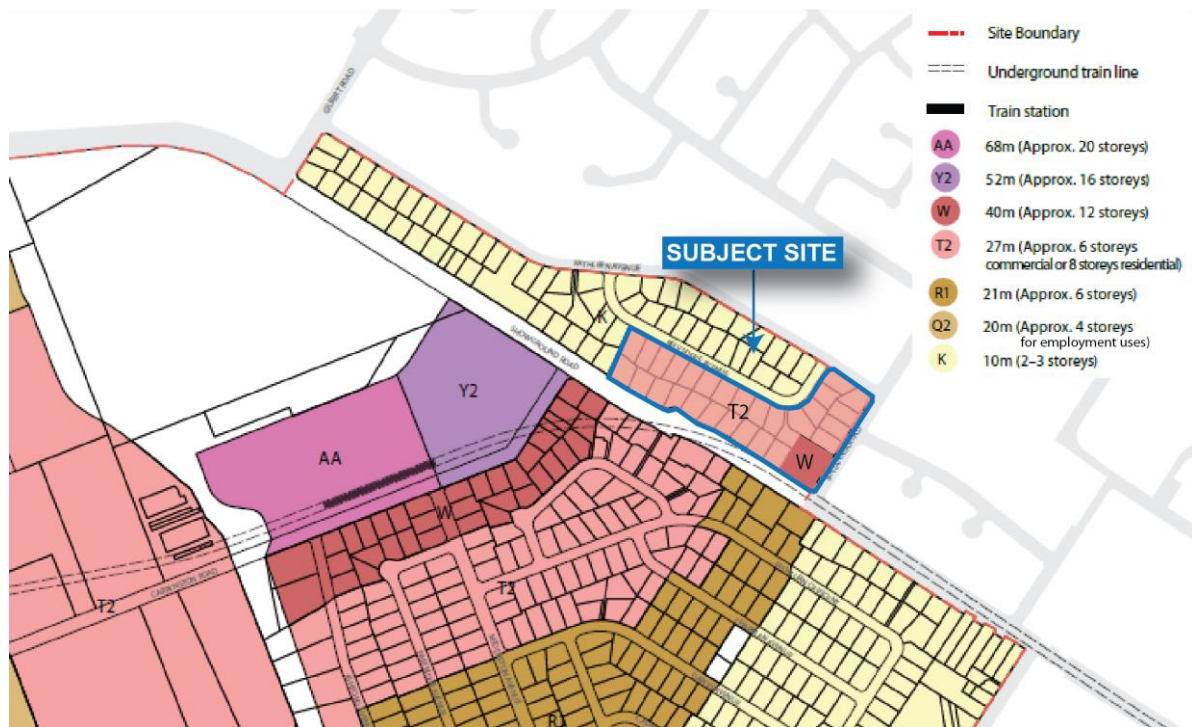


Figure 12: Proposed Building Height Map

Amend the Floor Space Ratio map to provide a floor space ratio of 2.7:1 as shown in the FSR Map extract below.

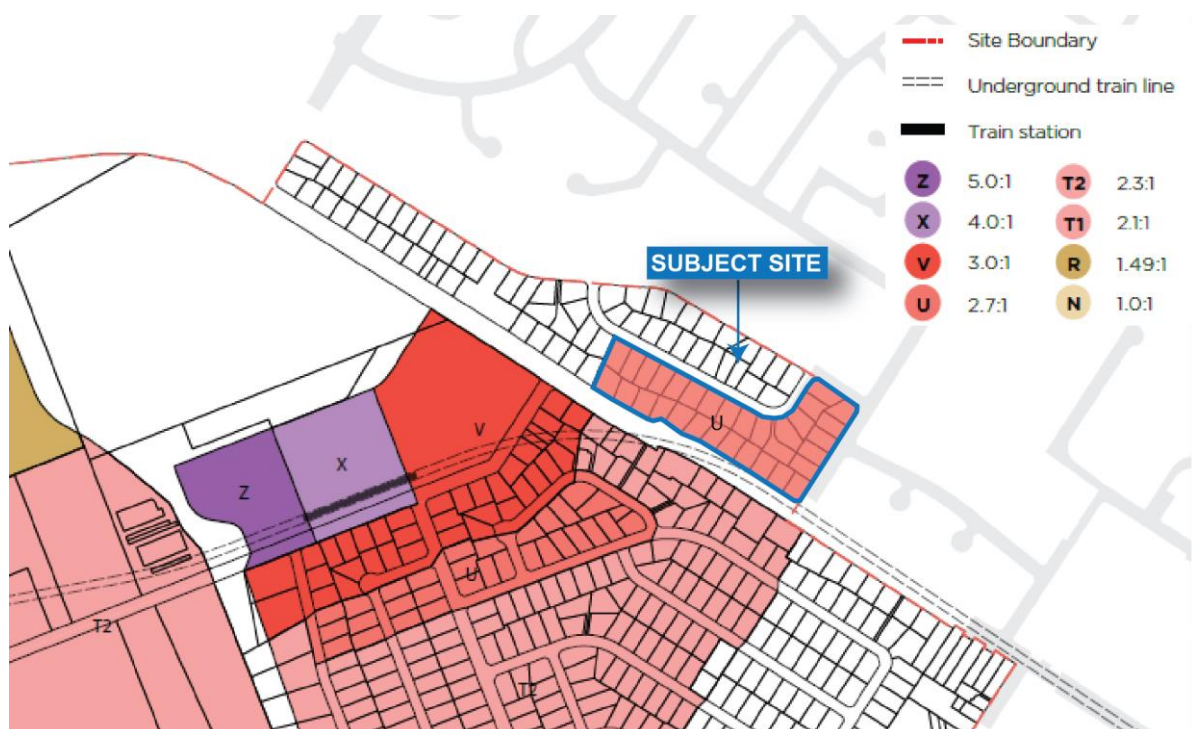


Figure 13: Proposed FSR Map

The amendments to the planning instrument to facilitate a development consistent with that shown at **Attachment 4** would achieve the following objectives:

- Provides additional residential apartments that are located within 400 metres of the proposed Showground Railway station.
- Provides a height transition from the 16 storey height limit opposite the subject site. **Attachment 4** demonstrates a section through the Precinct from the Showground Railway Station through the subject site of what the skyline would look like under the existing controls. This diagram demonstrates the significant change in height from the western side of Showground Road down to the subject by 9-11 storeys. Also forming part of **Attachment 4** is a diagram which shows the same skyline through the same section if the envelope concept was constructed. It is evident to see that this scheme provides a height transition from the station.
- The marker building of 12 storeys on the corner of Britannia Avenue and Showground Road provides a sense of entry into this Precinct when travelling north-west along Showground Road from Castle Hill. A 12 storey marker building on the corner of Britannia and Showground Road marks the entry to the high density residential area and provides a visual focal point when entering the Precinct. 12 storeys was considered appropriate as it is lower than the buildings in the station core, but taller than the buildings surrounding it, so as not to interfere with the legibility of the Station Precinct.
- We have been advised by a Property Broker that it is unlikely that these properties will be redeveloped for townhouse developments in the short to medium term as it is not economically feasible to do so. Accordingly, it is likely that these detached dwelling houses will remain in this Precinct beyond the 20 year timeframe of this Plan.

In relation to other areas that are proposed for significant rezoning under this Precinct Proposal, DFP does not see the utility in zoning land R1 General Residential on land is currently zoned for employment purposes on the western side of Cattai Creek to the west of the proposed station. Additional residential apartment buildings in the form of shop-top housing on the western side of Cattai Creek reduces the amount of employment land available for the area and potentially causes land use conflict between new residents and existing or proposed light industrial or bulky goods operators.

It is the opinion of DFP that it is more appropriate to provide residential apartment buildings on the subject site within an existing residential area than convert employment lands to residential units. The proposed R1 zones on the western side of Cattai Creek are a similar distance from the proposed railway station as the subject site.

Attached under separate cover to this submission is a petition signed by 103 of the 110 owners of land within the precinct of Showground Road, Belvedere Avenue, Kathleen Avenue, Britannia Road and Gilbert Road which all support the rezoning of land in this Precinct to R4 High Density Residential. Rarely is there such overwhelming support for a rezoning.

If it were the case that the Showground Railway Station had been in existence for over 100 years like the majority of railway stations in Sydney, it is highly likely that the subject site would have been rezoned for high density residential development as there are few areas in the Sydney Metropolitan area that are located within 400 metres of a railway station that are not zoned for residential apartment buildings.



## 8.0 Conclusion

This submission has considered the various planning instruments and structure plans that have been exhibited and that affect the subject site. This submission demonstrates the reasons why the subject site is considered appropriate for residential apartments given that the various structure plans have identified that the site does not contain any development constraints.

The owners within this group, with the exception of 2, have all contributed to this study demonstrating their interest in seeing this site redeveloped. The residential group have no interest in selling their properties purely for townhouse development as land value would not be great enough to justify relation and repurchasing costs and would prefer to remain in their houses and enjoy the convenience of the station.

This submission includes a Constraints and Opportunities map (**Attachment 3**) and a building envelope concept (**Attachment 4**) that demonstrates that the site is appropriate for a variety of apartment buildings ranging in height from 5 storeys to 12 storeys. The 12 storey building is a marker building located on the intersection of Showground Road and Britannia Avenue marking the entry into the Showground Precinct. The majority of buildings range in height from 8 to 5 storeys with the 8 storey buildings located along Showground Road which provide an acoustic buffer to units at the rear.

The stepping down of the buildings to the north assists in solar access, but also provides a transition to other residential properties on the periphery of the precinct as demonstrated in the plan at **Attachment 4**.

The concept plan has demonstrated that the site can appropriately accommodate approximately 524 units on the 3.13 hectare site. Accordingly it is requested that the DoPE consider amending Showground Station Precinct to R4 High Density Residential, amend the height map to allow 5-12 storey buildings and amend the FSR map to 2.7:1.

DFP trusts the information contained in this submission assists Council in its consideration of the Showground Railway Station Precinct and should there be any further queries, please do not hesitate to contact Warwick Gosling on 9980 6933.

Yours faithfully  
**DFP PLANNING PTY LIMITED**

A handwritten signature in black ink, appearing to read 'W. Gosling', written over a horizontal line.

**WARWICK GOSLING**  
**DIRECTOR**

wgosling@dfplanning.com.au

Reviewed: \_\_\_\_\_

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- Encl.    1.    List of Residents  
          2.    Previous submission  
          3.    Site Plan and opportunities and constraints  
          4.    Development concept and height transition diagrams