

Mahbubeh Mahmoudi and  
Sanaz Zarkesh  
30B Kathleen Avenue  
Castle Hill, 2154

28 February 2016

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

Dear Ms Carruthers

We are writing to comment on the Department of Planning and Environment's (DPE) Draft Precinct Proposal for the Showground Precinct.

Our family have lived at 30B Kathleen Ave for over 5 years and within The Hills Shire for more than 16 years and have a strong connection in the area. We very much value the character of the area, of our street most specifically and have strong views on preserving this and on what the area should look like. We have a strong connection to the area, a good appreciation of its character and clear views on what it should look like as urban densities increase with the rezoning that will accompany the construction of the Sydney Metro Northwest.

As the 'Declaration of Unity of Property Owners' indicates, our immediate neighbours (the 'Central Pod' as attached) are united with us in the belief that the Kathleen Precinct should be zoned **R4 High Density Residential**. This view is also strongly held by all but two or three of the 106 property owners in the Kathleen Precinct.

In summary, the following points clearly support the view that the Central Pod area and the broader Kathleen Precinct should be zoned R4 High Density Residential:

#### **1. Located within 400 metres of Showground Station with excellent walking access**

The Central Pod properties (including 30b Kathleen Ave) are all located within 400 metres of the Showground Station which means they are an easy 5-7 minute walk from the station. To exclude properties within 400 metres from the station from a R4 High Density Residential zoning is contrary to current State Government Planning principles.

*A Plan for Growing Sydney* specifically says, "The most suitable areas for significant urban renewal are those best connected to employment and include:

- In and around centres that are close to jobs and are **served by public transport services** that are frequent and capable of moving large numbers of people. "

Being located within 400 metres of the Showground Station and with easy access to other services, it is logical for the properties in the **Central Pod to be zoned R4 High Density Residential development** rather than have an R3 zoning that will only allow for 2-3 storey townhouses and terraces.

## **2. Inconsistencies between the northern and southern sides of Showground Road**

As pointed out, the Central Pod properties are all located with 400 metres of the Showground Station, which means they are an easy 5-7 minute walk from the station. It is inconsistent to have these properties zoned for townhouses when it is proposed that properties over 800 metres from the station on the southern side of Showground Rd will be zoned for high density residential. This is an inconsistent and 'disorderly' approach to land use planning.

The zoning inconsistencies are accentuated by the fact that different zonings are proposed for the different sides of Showground Rd. The density proposed for the southern side of Showground Rd is in the order of 300 dwellings/hectare, yet on the northern side of Showground Rd (and Kathleen Ave/Belvedere Ave) the proposed density is about 39 dwellings/hectare.

## **3. A 'townhouse zoning' is likely to deliver reduced amenity and commercial viability**

Ironically, by proposing town house/terrace densities in the Central Pod and other areas of the Kathleen Precinct, DPE's Precinct Proposal is likely to condemn residents in this area to reduced open space and other amenity. To have any likelihood of commercial viability, town houses will need to be built to the maximum permissible densities, reducing open space and amenity. In contrast, multistorey development will encourage larger setbacks and the retention of trees and 'deep soil'.

Underlying land values in the Kathleen Precinct make townhouse and terrace development unviable. While this type of development can provide housing choice in 'greenfield areas' it is not economically viable for urban renewal in Castle Hill.

Feedback from the development industry (from the UDIA to individual companies) has made it very clear that 4 dwellings per 1000 sq metres is not commercially viable, particularly when there will be a good supply of R4 land available along the Sydney Metro Northwest corridor. With little incentive for existing property owners to sell and less incentive for developers, the Kathleen Precinct will be at risk of becoming a poorly planned, unpleasant patchwork of existing homes and new townhouses. It is likely to be disorderly development at its worst.

## **4. Unity between landowners offer an opportunity for large, orderly R4 development with ample provision for open space and community facilities**

The Kathleen Precinct is comprised of 7 landowner Pods whose members have signed the attached Declaration of Unity and are prepared to work with one, or a small number of developers to achieve orderly R4 development with generous open space and community facilities. In recent weeks, 4 Pods (comprising 44 properties) from our Central Pod west to Gilbert Rd have been in joint discussions with one property group.

This high level of cooperation is a strong indication that very large, contiguous development areas could be delivered in the Kathleen Precinct if it is zoned R4.

## **5. Showground Road is a gateway, not a barrier**

We do not accept that densities in the Kathleen Precinct should be restricted to R3 because Showground Road is a significant barrier to access to the train station. The

current pedestrian lights at the intersection of Showground Round and Carrington Avenue are within 100 metres of our property.

As well, if major R4 it will be possible to establish a major 'gateway' to the new station by using Section 94 and other developer contributions (perhaps augmented by government funding) to constructing one or two pedestrian overpasses to connect the Kathleen Precinct to the Showground Station.

#### **6. Changing Government Policy will allow the 'housing choice' of townhouses and terraces in other areas**

As the DPE Discussion Paper contained in the following link indicates, it is very likely that future government policy/regulation will allow 2 storey dual occupancy, manor homes, townhouses and terraces to become 'complying development' -

[http://planspolicies.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=7407](http://planspolicies.planning.nsw.gov.au/index.pl?action=view_job&job_id=7407)

If the policy described above comes into effect, townhouses and terraces will be available in all areas of Sydney. With this housing choice met, it is logical to devote the Kathleen Precinct and other land of high development potential to R4 densities that are less suited in areas removed from high volume public transport.

#### **7. With Showground Rd to the south of the Central Pod site and the site favoured by a significant slope, it is well suited to multistorey development**

Showground Rd to Kathleen Avenue 'runs' south to north and has a significant slope. For these reasons, the northern side of Showground Rd is well suited to multistorey development. The slope will assist the inclusion of underground car parks, while the south to north orientation means that the development can 'step down' from taller buildings on Showground Road and lower buildings on Kathleen Avenue to allow good 'solar access' for all residents. There will be minimum shadow effects, making the development more pleasant for all residents.

#### **8. The Central Pod is not affected by development constraints**

The Central Pod properties are not affected by typical development constraints as indicated in the table below:

<b>Potential Constraint</b>	<b>Details</b>
Areas of Potential Salinity	Not affected.
Aboriginal Archaeological Potential	AHIPs required, but significant ACH values are unlikely.
Road Hierarchy	Site is positioned next to gateway intersection with easy access to station.
Contamination Sites	Not affected.
Bushfire Risk & Asset Protection	Not affected.
Flood Prone Land	Not affected.
Heritage	Not affected.
Land Reservation Acquisition	Not affected.

Strata Development	Strata scheme unanimously agree to form part of the site.
Native Vegetation Protection	Not affected.
Riparian Protection Area	Not affected.

While there are 2 strata developments within the CSKB, it is important to note that we, one of the four owners involved are strong supporters of resident plans to jointly sell our properties and have signed the attached Declaration of Unity.

Given these points, it is our view that the Central Pod and other areas between Showground Rd and Kathleen Ave should be zoned R4 high Density Residential, with consideration given to the northern side of Kathleen Ave to be zoned for townhouses and terraces.

Kind Regards,

Ms Mahbubeh Mahmoudi  
& Miss Sanaz Zarkesh

Attachment 1

