



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

**RE: SUBMISSION TO THE DRAFT SHOWGROUND STATION PRECINCT PROPOSAL  
16-20 SALISBURY ROAD & 12-14 ANELLA AVENUE, CASTLE HILL (LOT 2, DP 832026 & LOT 10  
DP 788658)**

**Attention: Ann-Maree Carruthers**

**1. INTRODUCTION**

This submission is made on behalf of Goodman Property Services (Aust.) (Goodman), in relation to the draft Showground Station Precinct proposal prepared by the Department of Planning and Environment (DP&E) which seeks to amend *The Hills Local Environmental Plan 2012* (THLEP2012).

These proposed amendments to THLEP2012 are as a result of the construction of the Sydney Metro Northwest which delivers the railway corridor and a railway station through and within the Showground Station Precinct. The subject site is located approximately 400m from the future railway station.

Goodman currently owns the subject site being 16-20 Salisbury Road and 12-14 Anella Avenue, Castle Hill (subject site) which is currently zoned IN2 Light Industrial and identified in **Figure 1** below. The figure below also illustrates the site's proximity to the future railway station and corridor.

While Goodman generally agrees with a number of the recommendations of the proposal, concern is expressed primarily in regards to aspects of the proposed zoning and built form and density across the subject site

This submission therefore relates specifically to:

- a) the proposed zoning;
- b) floor space ratio;
- c) building height; and
- d) road connection.

A summary of the amendments to the draft Showground Station Precinct proposal as proposed by Goodman follows.



Figure 1. Aerial Map (Source: SixMaps, 2016)

## 2. SUMMARY OF PROPOSED AMENDMENTS BY GOODMAN PROPERTY SERVICES (AUST.):

It is proposed by Goodman that the amendments to the Showground Station Precinct proposal be reconsidered in relation to the subject site to achieve the following outcomes:

- Zoning: B4 Mixed Use Zone across whole of the subject site as opposed to the currently proposed split zoning.
- Floor Space Ratio: 2:1 across the whole of the subject site with a minimum commercial (non-residential) use of approximately 15,000m<sup>2</sup>.
- Building Height: Raise the maximum building height to allow up to 12 storeys.
- Street Network: Deletion of proposed new road through No. 16-20 Salisbury Road and instead a pedestrian bridge crossing closer to the Showground Station end of the site.

There are sound planning reasons made in support of the modifications to the amendments to the draft planning proposal. While the details of these reasons are discussed below, essentially there are significant constraints on the site that need to be taken into consideration and which when understood demonstrate that the amendments sought are logical and in line with the government's strategic planning objectives.

### 3. DETAILS OF SUBMISSION

While this submission is directly in response to the draft Showground Precinct proposal, it is appropriate to consider the following other statutory planning documents that are important when considering the rezoning proposal that is currently under consideration:

- *The Hills Local Environmental Plan 2012* and as proposed to be amended by *The Hills Corridor Strategy*;
- *The Goodman submission to The Hills Corridor Strategy, prepared by Willowtree Planning, dated 9 November 2015.*
- *A Plan for Growing Sydney*;
- *Draft West Central Subregional Strategy*;
- *State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development*;
- *Apartment Design Guide*; and
- *The Hills Corridor Strategy.*

#### 3.1 Proposed Zoning/Standards under the draft Showground Station Precinct proposal

The draft Showground Station Precinct proposal seeks amendments to THLEP2012 for the subject site as detailed in **Table 1** below.

**Table 1: Proposed planning controls under the draft Showground Station Precinct proposal**

12-14 Anella Avenue	Zoning	Floor Space Ratio	Height of Buildings
Existing	IN2 Light Industrial	1:1	20m
Proposed	B5 Business Development; RE1 Public Recreation	1.49:1	20m (Approx. 4 storeys)
16-20 Salisbury Road	Zoning	Floor Space Ratio	Height of Buildings
Existing	IN2 Light Industrial	1:1	20m
Proposed	B5 Business Development; R1 General Residential; RE1 Public Recreation	1.49:1	20m (Approx. 4 storeys); 27m (Approx. 6 storeys commercial or 8 storeys residential)

The subject site is located in what is currently an industrial/business hub which is experiencing significant transition due to surrounding development and the introduction of the Sydney Metro Northwest. The site also enjoys easy access to community facilities such as the open space and sporting facilities to the north, as well as retail land uses to the south and west.

Given the site's proximity to the future railway station (approximately 400m), as well as being strategically located adjacent the Castle Hill Showground, the site is considered to be well suited for high density residential and mixed use development.

It is unclear how it is expected that the site would transition to any higher and better use, in circumstances where the proposed zoning and built form control amendments only allow for a marginal change in development outcomes. A proposed FSR of 1.49:1 creates no incentive to make any physical change to the site or its present use. Furthermore, the proposed creek crossing would not be able to be delivered and the site would not be able to contribute to the strategic ambitions of the Hills Corridor Strategy or the various transit oriented development objectives of the State government. We are at some loss to understand what the purpose of a rezoning would be in the circumstances of such small marginal change in floor space density. A proposed FSR control of 1.49:1 is a sub-urban density control and inconsistent with the medium to high density controls that one would ordinarily expect to see around a high density TOD styled planning proposal which is promoted in words by the Department in its planning proposal.

The subject site enjoys opportunities for greater accessibility to public transport, future road and pedestrian connections/upgrades and minimal potential amenity impacts to adjoining sites. The density proposed for the subject site is considered to be **significantly less** than the site can accommodate or for which it is suitable. Furthermore, given its location, the site is considered well suited for mixed use development (B4 zone) as opposed to a split zoning comprising R1 and B5.

This submission proposes an amendment to the draft Showground Station Precinct proposal which results in a higher density across the subject site as well as a B4 zoning for mixed use purposes. The precinct and subject site is considered to be strategically located for high density residential housing and mixed use development as a transition from the low – medium density housing to the north and east to industrial land to the south and west. The site is also well placed to further complement the Castle Hill Showground to the east through a higher density of housing. Given the immediate surroundings of the site, a higher density of development could not possibly result in any adverse amenity impacts to existing properties, residents or land uses.

The proposed increase in housing density within the subject site will also contribute to the local economy including the existing business park to the south and west which includes retailers such as Bunnings, Victoria's Basement, Bob Jane T-Marts, BCF, Harvey Norman, JB Hi-Fi and The Good Guys. These land uses are envisaged to benefit significantly from an increased residential density across the site. A higher density outcome will enable proper activation of the riparian corridor and other private open space.

The subject site also benefits from surrounding open space including the Castle Hill Showground to the east and multiple sporting facilities to the north including The Hills Basketball Association, Castle Hill United Football Club, and cricket and baseball fields. The proposed increased in housing stock, future residents and associated commercial uses will benefit from these surrounding open space areas and facilities.

### 3.2 Goodman Proposal

#### 3.2.1 Zoning

As outlined above the subject site is considered to be well suited for mixed use development and it is therefore proposed that the zoning under the draft Showground Station Precinct proposal is amended in accordance with **Table 2** below.

**Table 2: Proposed Zoning**

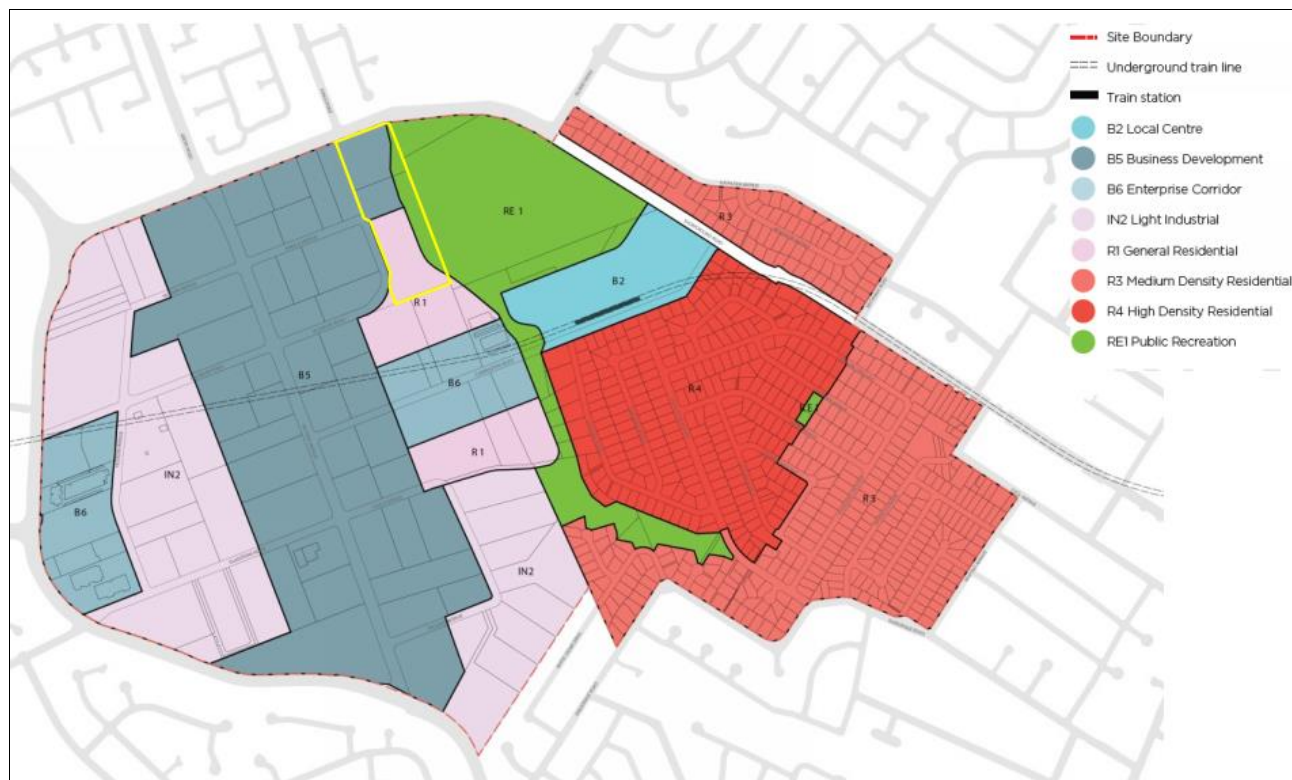
12-14 Anella Avenue	Zoning
Proposed under the draft Showground Station Precinct proposal	B5 Business Development; RE1 Public Recreation
Proposed by Goodman Property Services (Aust.)	B4 Mixed Use
16-20 Salisbury Road	Zoning
Proposed under the draft Showground Station Precinct proposal	B5 Business Development; R1 General Residential; RE1 Public Recreation
Proposed by Goodman Property Services (Aust.)	B4 Mixed Use

The subject site will benefit from the Sydney Metro Northwest as well as from improved transport, access and pedestrian movement within and around the Precinct. This includes a proposed pedestrian and cycleway through the subject site. The provision of additional pedestrian access links provides an appropriate environment for increased residential land uses.

The portion of the subject site adjoining Showground Road is considered to benefit from such provisions and therefore be suitable for some residential development as well as commercial development. The Precinct Plan nominates this portion of the site for future 'bulky good retail' development. The B4 Mixed Use zone permits *bulky goods premises* under THLEP2012. It is important to note that the proposed Mixed Use zone is consistent with the desired zoning by Council under *The Hills Corridor Strategy*. It should be noted that there is ample B5 zoned land in Victoria Avenue Precinct and bringing large volumes of commercial or retail traffic into the Anella Avenue cul-de-sac would be a sub-optimal planning and urban design outcome. Any destination shopping activity should be focussed on the Showground Road of the subject site only.



The R1 General Residential and B5 Business Development zones as illustrated in **Figure 2** below are not considered appropriate for the subject site and the future redevelopment of the site for residential and commercial purposes.



**Figure 2. Proposed Zoning Map** (Source: draft Showground Station Precinct proposal, 2015)

The B4 Mixed Use zone is considered to be a more compatible zoning across the entire subject site as it will facilitate a more reasonable and practical transition from the B5 zone to the west to the RE1 zone (Castle Hill Showground) to the east. The B4 zone allows for a greater mix of compatible land uses in a location experiencing a transition and will effectively integrate suitable commercial and residential land uses in a highly accessible location which will encourage the use of public transport, walking and cycling.

While the Department of Planning & Environmental seeks to create a split zone, part commercial and part residential, it is more important to note that The Hills Shire Council have proposed a B4 Mixed Use zone **across the whole site**. While The Hills Shire Council propose a minimum gross floor area of commercial land uses across the site for employment generating uses which is overly ambitious, the zoning intention is more consistent with how the site, given its proximity to the station and Showground Road, is more likely to be developed.

In Goodman's view, given the site's various road frontages and required APZ setbacks from the riparian corridor, the quantum of commercial land use that the Council and the Department are seeking is not considered achievable. The application of a B4 zoning across the subject site is considered most effective way to enable a properly integrated residential/commercial outcome and achieve the desired commercial floor area targets. The market will determine the nature and quantum of commercial land uses that are included. Goodman is willing to accept a minimum quantum of 15,000m<sup>2</sup> of commercially used floor space, which is likely to generate approximately 1000 jobs, which is greater than the current employment generation for the whole of the subject site. To seek a greater minimum commercial outcome is likely to leave the site sterilised.

It is important to note that the redevelopment scheme that is contained in the planning proposal prepared by the DPE is an obvious under-utilisation of the site. The proposed built form outcome that is put forward by the DPE highly unlikely to represent the highest and best use of the site. In the absence of higher density mixed use planning controls the subject site is likely to remain in its current built form.

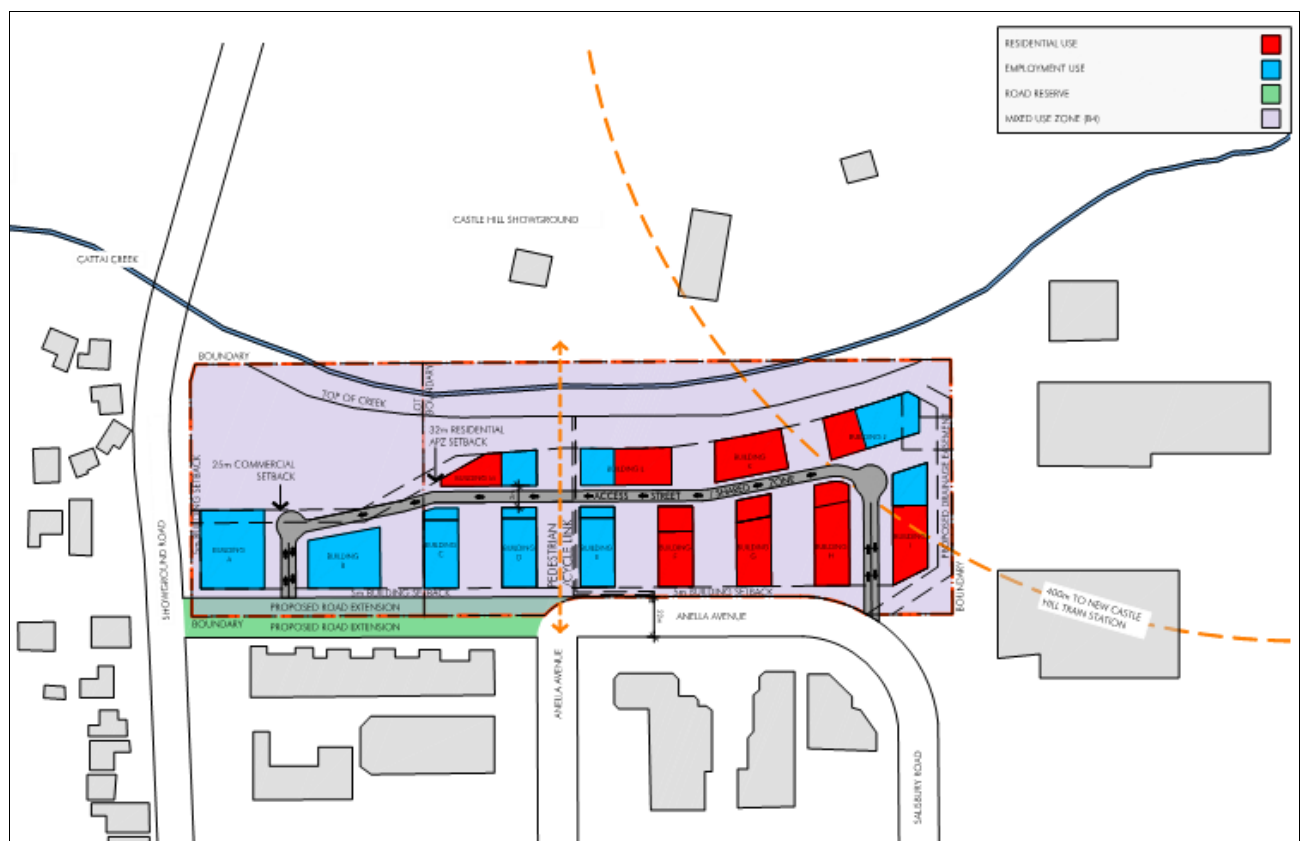
Whilst it is acknowledged that the protection of the riparian corridor (Cattai Creek) to the east is critical, the rezoning of this land to an RE1 Public Recreation zone is not considered necessary. The existing zoning across the subject site does not include an RE1 zone and as previously and currently required, future development of the site must consider the riparian corridor and ensure that no harm results from the redevelopment of the site.

Aecom has prepared a Riparian Corridor Assessment (**Appendix 1**) which stipulates the likely riparian corridor setbacks for the subject site as required by the NSW Office of Water (NOW) Guidelines for riparian corridors on waterfront land, July 2012'. Aecom find that by using these guidelines Cattai Creek is designated as a 2<sup>nd</sup> order watercourse, for which an average 20m vegetated riparian zone is required measured from the top of the highest bank on both sides of the watercourse.

Aecom however outlines that *the guidelines allow for the riparian corridor to be amended by 'the averaging rule', which allows for non-riparian corridor works and activities within the outer 50% of the corridor, so long as an equivalent area of riparian restoration connected to the corridor is put in place*. The drawing provided in Aecom's assessment illustrates the proposed riparian corridor restoration layout and provides the rationale for how the riparian corridor layout has been determined.

In light of the above, the inclusion of an RE1 zone along the eastern boundary of the site is not considered necessary and redevelopment of the site will subject to the NSW Office of Water Guidelines and their approval.

**Figure 3** below illustrates the proposed ground floor land use mix across the site with commercial land uses identified in blue and residential in red.



**Figure 3. Proposed Land Use Mix by Goodman Property Services (Aust.)** (Source: Nettletontribe proposal, 2016)

### 3.2.2 Floor Space Ratio

As outlined above the subject site is considered to be suitable for a higher density of development and it is therefore recommended that the Floor Space Ratio (FSR) proposed under the draft Showground Station Precinct proposal is amended in accordance with **Table 3** below.

**Table 3: Proposed Floor Space Ratio**

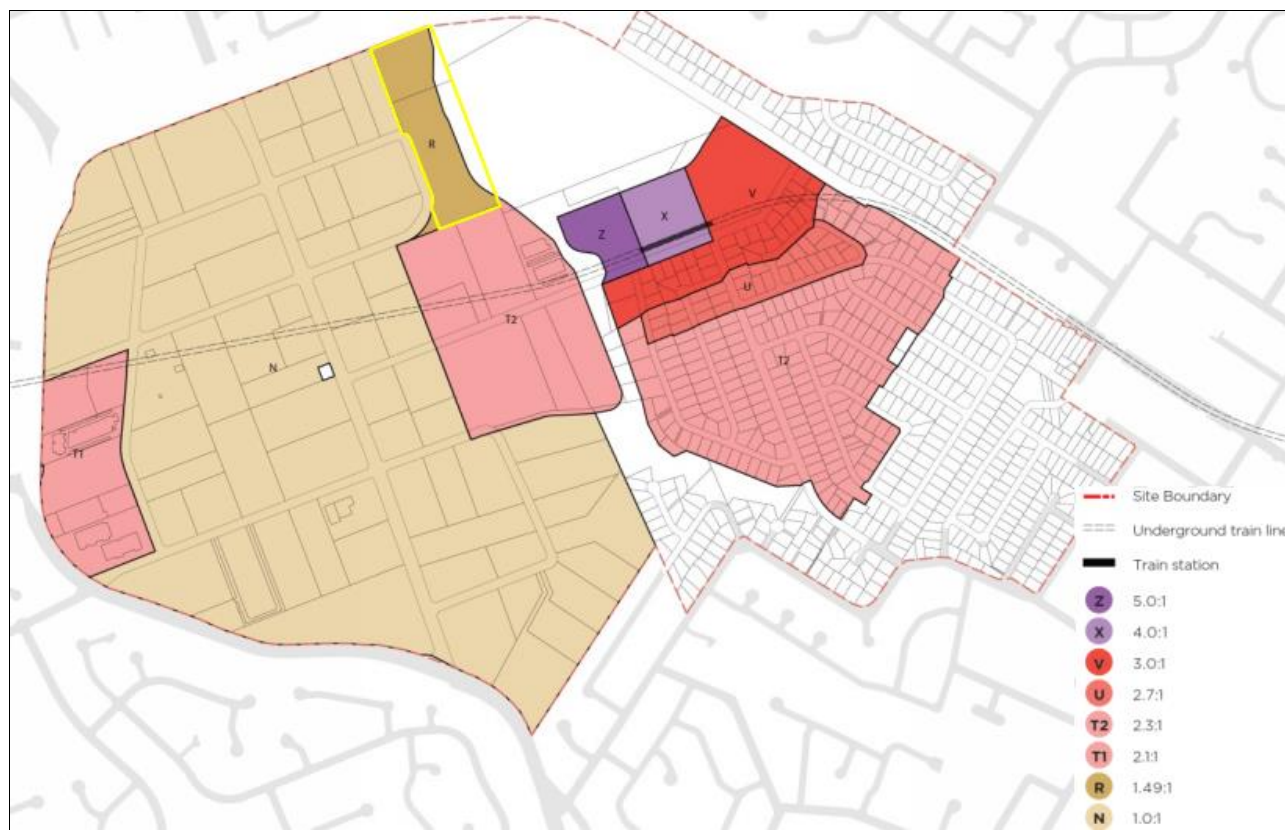
12-14 Anella Avenue	Floor Space Ratio
Proposed under the draft Showground Station Precinct proposal	1.49:1
Proposed by Goodman Property Services (Aust.)	2:1
16-20 Salisbury Road	Floor Space Ratio
Proposed under the draft Showground Station Precinct proposal	1.49:1
Proposed by Goodman Property Services (Aust.)	2:1

**Figure 4** below illustrates the FSR proposed by DP&E. Given the proposed zoning of the subject site to B4 Mixed Use, it is considered reasonable that the FSR is increased accordingly to facilitate new apartment buildings and shop top housing development to maximise employment opportunities and achieve housing targets.

The land directly south of the subject site zoned R1 General Residential and B6 Enterprise Corridor has been nominated an FSR of 2.3:1. Given the proximity of the subject site to this land and the similar permitted land uses, it is considered reasonable to propose an FSR of 2:1 across the subject site.

If the DP&E approach is adopted the site will be substantially underutilised. Sites is 400m of a station are generally accepted as being land within a Transit Orientated Development precinct and as such modern planning principles would encourage a higher density and development which would encourage the use of the new or existing infrastructure.

Current planning principles suggest that an FSR of 2:1 is a good starting point for medium to high density development. Anything less is likely to result in stagnation as the land would not be used for its highest and best use. The value of existing improvements, the cost of remediation and the cost of building new improvements to take advantage of the new zoning are all capital expenses that are not likely to be made unless there is sufficient economic incentive to move the site towards its higher and better planning use. Goodman is seeking a higher FSR, but not one that is out of line with surrounding FSRs that are proposed and one which is totally consistent with the State government's objectives. Comparisons to other TOD proposals, such as Epping Station, Delhi Road Station, Carter Street precinct, all confirm that the Goodman proposal for the subject site is very conservative, indeed at 2:1 is somewhat lower than what might otherwise be expected. However, Goodman is sensitive to the other urban design issues that exist in this location and thus it is not arguing for a significantly higher FSR, but certainly one that will support the strategic intentions of the DPE and the State.



**Figure 4. Proposed Floor Space Ratio Map** (Source: draft Showground Station Precinct proposal, 2015)

Given the constraints of the site including the riparian corridor along the eastern boundary, the building footprint potential across the site is limited. Further to this, the development of the site will be subject to the building height controls and adequate street and building setbacks under The Hills DCP 2012 as well as the Apartment Design Guide under *State Environmental Planning Policy No. 65*. Should an FSR of 2:1 be adopted, the potential scale and bulk of the future development of the site is therefore not considered to be detrimental to desired amenity of the area or surrounding land uses.

In light of the above, the intension of a proposed FSR of 2:1 is to allow for greater flexibility to the developable land within the subject site. This FSR increase will provide a more suitable built form transition from the land to the south and towards Showground Road. Furthermore the resulting built form will not impact upon adjoining land uses which are to be commercial to the west and the existing public open space to the east.

The proposed increase in FSR is consistent with the Precinct Proposal's vision in that it will make further provision for *a range of housing stock, employment and retail services close to public transport*. Furthermore is will ensure the *delivery of more homes close to the station to meet growing demand and increase housing choice to reflect changing household sizes and lifestyles*.

It is considered reasonable to conclude that the proposed FSR of 2:1 will not be detrimental to the amenity of the area or the surrounding land uses and will rather provide a significant contribution to the existing housing and employment demands within Sydney's North West.



### 3.2.3 Height of Buildings

As outlined above the subject site is considered to be suitable for a higher density of development and it is therefore recommended that the maximum building heights proposed under the draft Showground Station Precinct proposal is amended in accordance with **Table 4** below.

**Table 4: Proposed Height of Buildings**

12-14 Anella Avenue	Height of Buildings
Proposed under the draft Showground Station Precinct proposal	20m (Approx. 4 storeys)
Proposed by Goodman Property Services (Aust.)	9 – 10 storeys
16-20 Salisbury Road	Height of Buildings
Proposed under the draft Showground Station Precinct proposal	20m (Approx. 4 storeys); 27m (Approx. 6 storeys commercial or 8 storeys residential)
Proposed by Goodman Property Services (Aust.)	8 – 12 storeys

**Figure 4** below illustrates the height of buildings proposed by DP&E. Given the proposed zoning of the subject site to B4 Mixed Use, it is considered reasonable that the maximum building height is increased accordingly to facilitate new apartment buildings and shop top housing development to maximise employment opportunities and achieve housing targets.

Given its proximity to the future station, Showground Road and the proposed local centre bordering the Castle Hill Showground to the south, the site is considered suitably positioned for a higher building density and permitted building height.

The residential and commercial zoned land surrounding the future station has been nominated building heights of 12-20 storeys. Granted these sites surround the station itself, but the subject site is located only 150m from the Showgrounds Station at its nearest boundary.

The building heights proposed (4-8 storeys) are not considered reasonable and do not demonstrate the development potential of the site to contribute to achieving the desired employment and housing targets throughout the Precinct.

As illustrated in the Site Plan (**Appendix 2**) prepared by Nettletontribe, an amended maximum building height across the site is proposed. As per the Site Plan provided a maximum building height across the site ranging from 8-12 storeys is proposed.

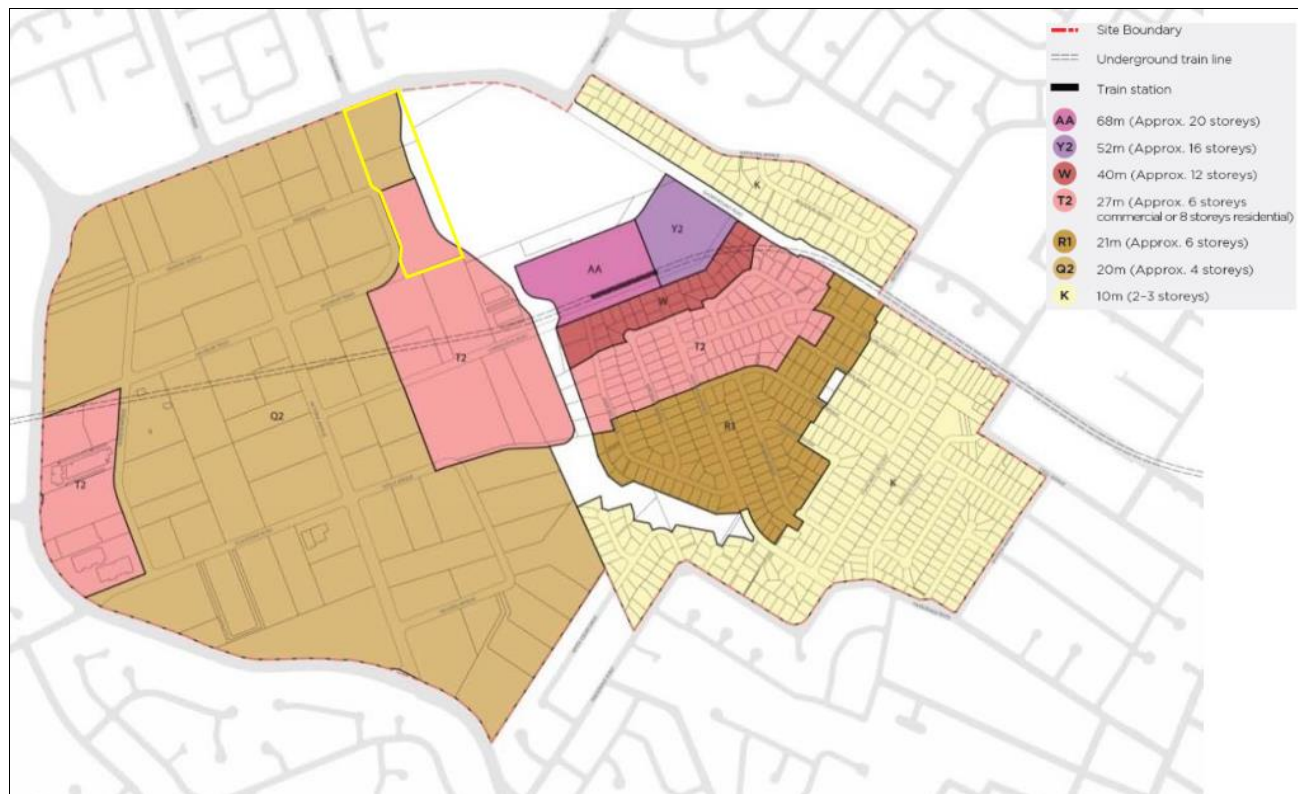
It is also important to note that the riparian setbacks that may be required and the consequent APZ zone that should probably be provided has the consequential impact of significantly reducing the future developable area. While the existing buildings do not reflect this future APZ and riparian boundaries, having been built many years ago, there would be no incentive for the owner to demolish existing buildings and have the consequential effect of reducing the developable areas without some compensation in the form of taller buildings.

The Goodman proposed building heights are considered to demonstrate a more appropriate transition from the local centre and away from the station, i.e. generally falling from the station to Victoria Avenue while allowing the subject site to act as a gateway to the station. Furthermore these building heights are unlikely to result in detrimental impact to adjoining land uses as the site is ideally located adjacent to the Castle Hill Showground and Showground Road to accommodate these building heights.

The proposed increase in building heights is consistent with the Precinct Proposal's vision in that it will make further provision for *a range of housing stock, employment and retail services close to public transport*. Furthermore it will ensure the *delivery of more homes close to the station to meet growing demand and increase housing choice to reflect changing household sizes and lifestyles*.

It is also useful to reflect on the expectation that the building heights Goodman site would be a gateway site to the rejuvenated Showgrounds precinct and station head. The subject site should therefore have some additional permissible height to encourage that transformation and to enable the subject site to perform that function of guiding urban form and design outcomes for the station precinct

It is therefore considered reasonable to conclude that the building heights proposed by Goodman as set out in the Nettleton Tribe plans (**Appendix 2**) will not be detrimental to the amenity of the area or the surrounding land uses but will rather provide a significant contribution to the existing housing and employment demands within Sydney's North West.



**Figure 5. Proposed Height of Buildings Map** (Source: draft Showground Station Precinct proposal, 2015)

### 3.2.4 Extension of Anella Avenue

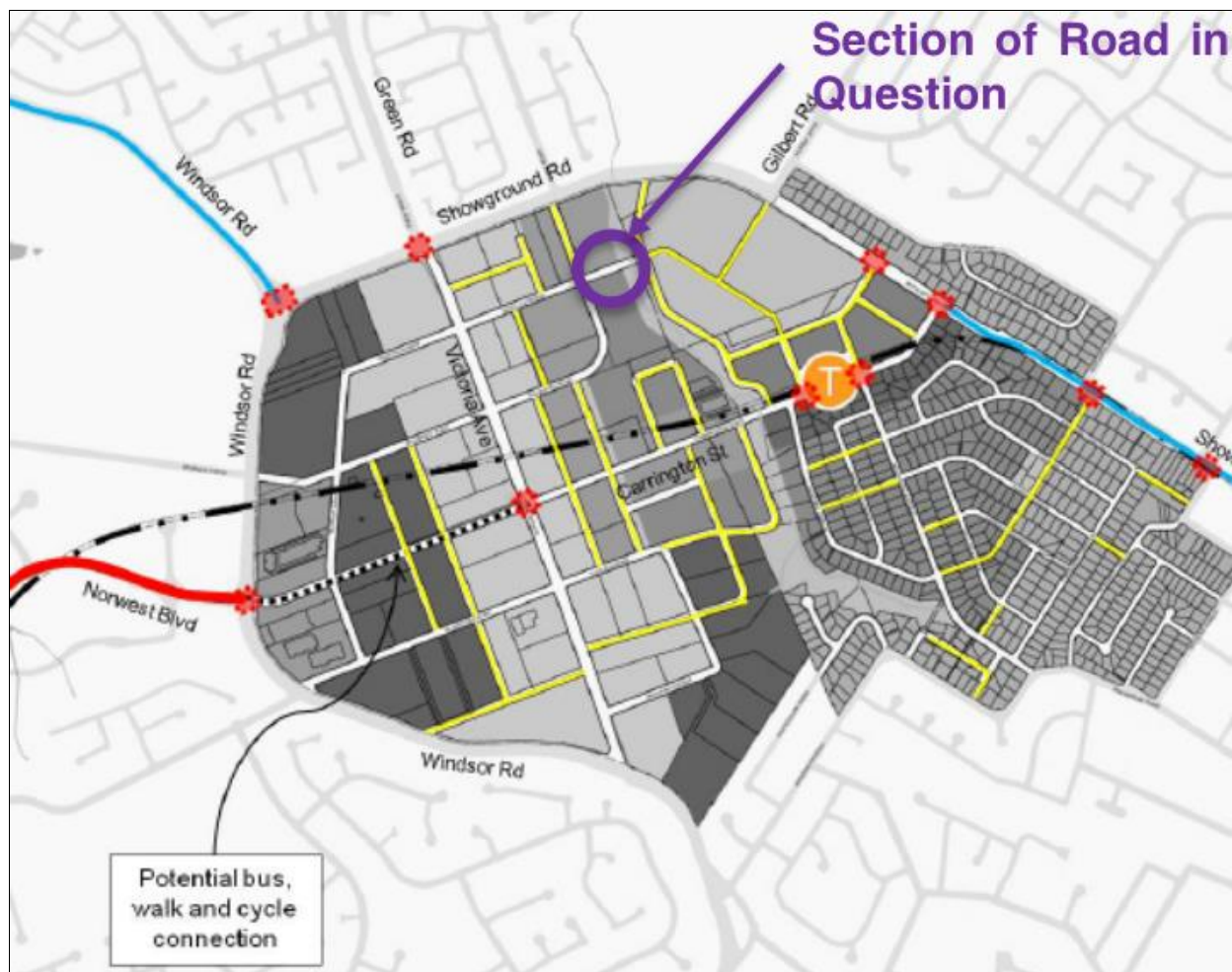
The draft Showground Station Precinct Proposal identifies a new local road running east-west as an extension of Anella Avenue through No. 16-20 Salisbury Road as illustrated in **Figure 6** below.

It is proposed that this road extension be removed from the proposal whilst maintaining the pedestrian access and cycleway connection through the site. Traffic consultants, Ason Group, have carried out a review of the proposal and specifically the intended extension of Anella Avenue and is provided in **Appendix 3**.

The original Structure Plan carried out by Transport for NSW (TfNSW) in September 2013 did not envisage this local road connection across the riparian corridor. Furthermore this connection is shown only as a pedestrian link within *The Hills Corridor Strategy*.

As outlined in Ason Group's review, The Hills Shire Council have expressed concerns with the increased traffic volumes throughout the Precinct especially along Carrington Street. In response to these concerns Ason Group have found that *the intersections of Carrington Street with Victoria Avenue and Showground Road will operate with acceptable delays during peak periods, following implementation of the improvement works identified to those locations*.

In light of the above, the current traffic modelling does not indicate any particular capacity constraints along Carrington Street that would warrant provision of an alternative vehicular connection in this location.



**Figure 6. Proposed Road Location** (Source: Showground Station Precinct Transport Plan, 2015)

As outlined in Ason Group's review the area immediately surrounding the road in question lies within 800m of the future Showground Station and the use of the new Sydney Metro Northwest service should be encouraged.

Ason Group further outline that the extension of this road could result in the creation of a traffic route for trucks and other commercial vehicles associated with the bulky goods and light industrial land uses surrounding and potentially having a detrimental impact on future residents.

Furthermore this extension of Anella Avenue is proposed to traverse the existing riparian corridor of Cattai Creek. This is considered to potentially result in detrimental impacts to the riparian corridor due to the nature of the bridge structure required for vehicles and the constant flow over vehicles along this road.

Ason Group concludes that the subject road *provides minimal benefit to the vehicular connections to the surrounding arterial road network* and that its removal *will not have a significant impact on the previous transport planning and modelling undertaken by TfNSW*.

If any link is to be retained, whether or not it is used also for vehicles, we also strongly recommend the (pedestrian) link be moved closer to the station so that pedestrians enjoy the most direct, less circuitous route to the station. At its present location, bisecting the Goodman lands, would require pedestrians to walk further away from the station to get to the pedestrian link that would then take them to the station. If the link was shifted further to the south east of the Goodman property, closer to the station, then it would be more convenient for all users seeking to access the station.



### 3.2.5 Additional Comments

The draft Showground Station Precinct proposal nominates a conceptual built form across the Precinct and subject site and illustrated in **Figure 7** below. This figure demonstrates five (2) individual buildings broken up into commercial and residential land uses. Whilst a mix of commercial and residential land uses is supported, the built form and layout of these buildings are not considered to demonstrate the full development potential of the subject site.

An amended built form across the subject site is therefore proposed which still achieves the relevant standard including floor space ratio, building heights, landscaping, setbacks, building separation and remains clear of the existing riparian corridor to the east.

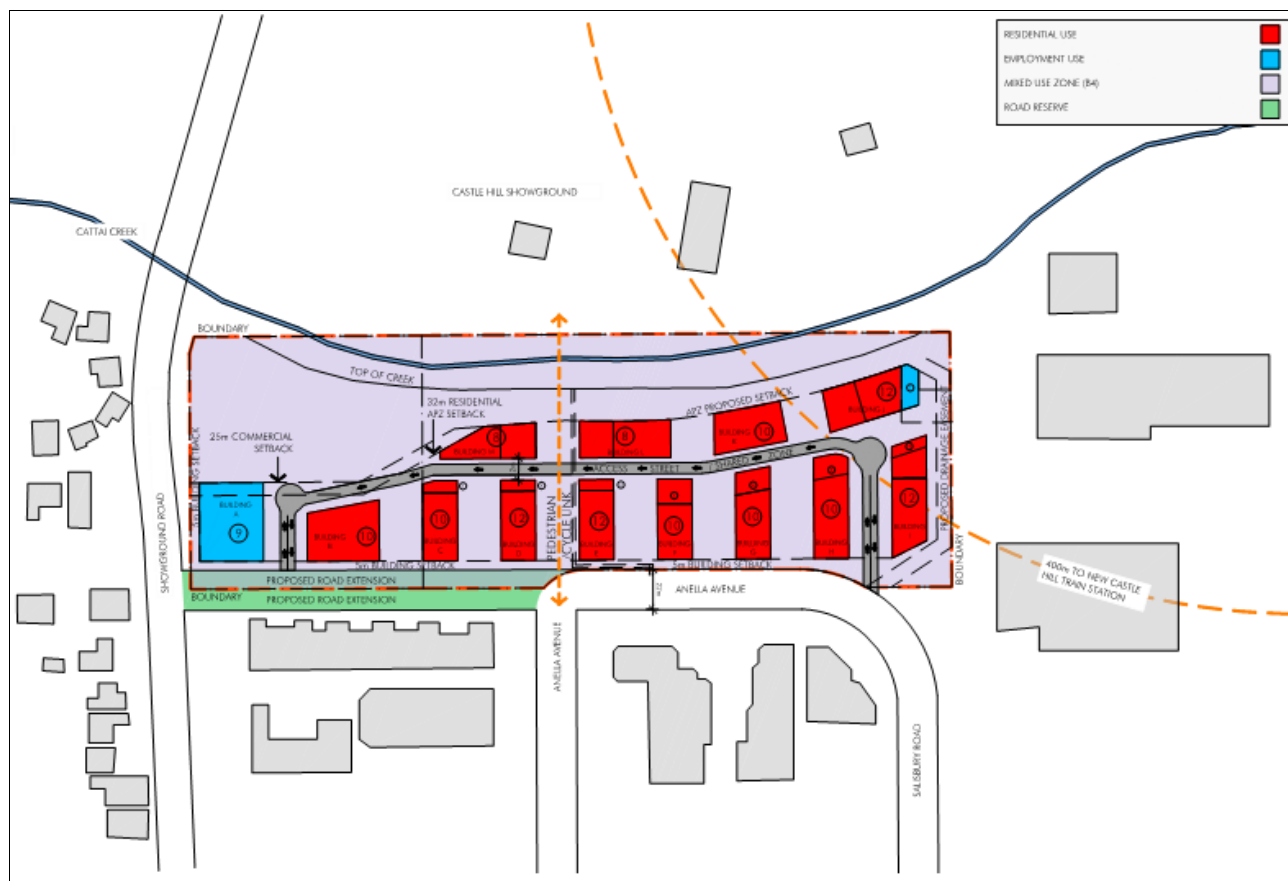


**Figure 7. Proposed Built Form** (Source: draft Showground Station Precinct proposal, 2015)

Architects, Nettletontribe, have prepared a set of drawings to demonstrate the desired built form and layout across the subject site and are provided in **Appendix 2**.

The proposed Site Plan (**Figure 8**) below illustrates an array of mixed use and residential buildings as well a commercial building on the corner of Showground Road and Anella Avenue extension.





**Figure 8. Proposed Built Form by Goodman Property Services (Aust.)** (Source: Nettletontribe proposal, 2016)

These plans prepared by Nettletontribe are considered to demonstrate a more suitable layout and achieve the full development potential across the site.

Although conceptual, these plans are considered to demonstrate a compliant scheme against The Hills DCP 2012 and the requirements under *State Environmental Planning Policy No. 65* including the Apartment Design Guide.

It is acknowledged that the proposed amendments to the building layout across the site conflict with the existing stormwater easements within site. AT&L have provided a Stormwater Diversion Strategy (**Appendix 4**) which confirms that the diversion of these easements is achievable as part of the redevelopment of the site as demonstrated in the drawing provided in the strategy by AT&L.

This built form and layout will contribute to the provision of an increased housing stock and employment and retail services close to public transport without adversely impacting on the amenity of the area or surrounding land uses.

Given the proposed built form across the balance of the Precinct, the proposed amendment is not considered to be unreasonable and is consistent with the layouts nominated to surrounding sites for similar land uses.

The proposed built form demonstrated in **Appendix 2** is therefore considered to be far more beneficial for the Precinct and likely to contribute considerably to the vision of the draft Showground Station Precinct proposal.

### 3.3 A Plan for Growing Sydney

To achieve the Government's vision for Sydney as *a strong global City, a great place to live*, A Plan for Growing Sydney sets out four main goals, for Sydney to be:

- a competitive economy with world-class services and transport;
- a City of housing choice with homes that meet our needs and lifestyles;
- a great place to live with strong, healthy and well connected communities; and
- a sustainable and resilient City that protects the natural environment and has a balanced approach to the use of land and resources.

The proposed increased in density across the site ensures opportunity for the provision of an increase in housing stock and employment opportunities. The proposal supports the Plan through the provision and opportunity for additional housing choice that meets the needs and lifestyles within the region.

One of the biggest challenges to achieving the goals of the Plan is how to provide for the 664,000 new homes and 689,000 new jobs needed for the predicted 1.6 million residents by 2031.

The Priority Precinct program has been implemented by the NSW Government and is an integral part to meeting the goals in A Plan for Growing Sydney. The Priority Precincts program aims to provide for new housing and jobs in centres with good transport connections making it easier for people to get to and from home to work.

The Showground Precinct has been identified as a Priority Precinct due to its proximity to public transport, open space and its ability to attract future residents and employment opportunities. Whilst it is acknowledged that built form and density characteristics throughout the Precinct should be diverse, the location of the subject site is considered to be appropriate for a higher density of mixed use development.

The draft Showground Station Precinct proposal is therefore considered to have adopted a highly conservative approach for the site which will likely only cater to the short to medium term goals of A Plan for Growing Sydney as opposed to the long term goals.

The proposed amendments to the zoning, built form and density under the proposal are therefore considered to be far more effective in achieving these goals.

The site is located within the West Central Subregion which encompasses The Hills entire LGA. The West Central Subregion is discussed below.

### 3.4 Draft West Central Subregional Strategy

The West Central Subregion has been identified as an area with significant focus on infrastructure investment and intensive growth over the next 20 years. The strategy focuses on the provision of a network of centres to support the Greater Parramatta region.

The priorities for the West Central Subregion are as follows:

- A competitive economy;
- Accelerate housing supply, choice and affordability and build great places to live; and
- Protect the natural environment and promote its sustainability and resilience.

By adopting this methodology and allowing an increased density across the site for development which achieves the Strategy's criteria, future development of the site will be subject to a standalone assessment to determine whether a density of this magnitude is to be granted consent. Council will still have the ability to only grant consent to the desired built form and density in the event the key design criteria are achieved.

In light of the above, the nominated zoning and density standards across the subject site under the proposal are not considered to be suitable or beneficial in achieving the desired outcomes under the proposal or A Plan for Growing Sydney. Furthermore these provisions do not demonstrate the subject site's full development potential.

Based on the matters discussed above it is recommended that the draft Showground Station Precinct proposal be amended to accommodate the desired zoning and density for the subject site as these are considered far more suitable and strategically beneficial to the Precinct and surrounding land uses.

Should you require further information, please contact the undersigned.

Yours Faithfully,



Thomas Cook  
Associate Director  
Willowtree Planning (NSW) Pty Ltd  
ACN 146 035 707