



KS/DA
16163

11 March 2016

Ann-Maree Carruthers
Director Urban Renewal
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Ann-Maree,

**SUBMISSION SUBMISSION SHOWGROUND STATION PRECINCT PROPOSAL
22-36 MIDDLETON AVENUE & 5-19 HUGHES AVENUE CASTLE HILL**

We thank you for the opportunity to comment on the *Showground Station Precinct Proposal* (the Precinct Proposal).

This submission has been prepared by JBA on behalf of a landowners group that own 22-36 Middleton Avenue and 5-19 Hughes Avenue, Castle Hill (the site) which is within 400 metres of the new Showground Railway Station.

JBA considers the site to be suitable for a floor space ratio (FSR) of 2.7:1 and a height of 27 metres based on the densities and heights applied to other similar sites in close proximity to the new station.

In addition, as the site provides a large consolidated area for redevelopment, it provides an appropriate opportunity to deliver additional floor space and residential accommodation in an accessible location, with the potential to provide a FSR of up to 3:1. An architectural scheme prepared for this submission by Platform Architects (see **Attachment A**) indicates that a FSR of 3:1 can be achieved on the site (within a height limit of 27 metres) without adverse built form or amenity impacts, and consistent with the design criteria set out for residential flat buildings in the Apartment Design Guide (ADG).

An increased FSR (and height) will also compensate for the loss of developable land on the site resulting from a proposed roadway extension over the site as envisaged in the Precinct Proposal, and will incentivise the delivery of this new road infrastructure within the Precinct.

On this basis, it is requested that the DP&E amend the Showground Station Precinct to that the DP&E increase the proposed FSR from 2.3:1 to 3:1 and the maximum height limit to 27 metres on the site. Further justification is provided below.

1.0 THE SITE

The site is located on 22-36 Middleton Avenue and 5-19 Hughes Avenue, Castle Hill and is part of The Hills local government area. A key feature of the site is its significant site area of 14,932m² and proximity (less than 400m) to the new Showground Railway Station.

The site is owned by a consortium of landowners and is proposed to be redeveloped as a single parcel of land. The site is currently of a low density residential character with detached housing as the primary built form within the area.

The existing planning controls applicable to the site under the *The Hills Local Environmental Plan 2012* are:

- Land Use Zone – R2 Low Density Residential
- Maximum Height of Buildings – 9 metres
- Maximum Floor Space Ratio – N/A

An aerial photo of the site is shown at **Figure 1**.



 The Site

Figure 1 – The site is shown outlined in red.

2.0 STRATEGIC PLANING CONTEXT

Sydney is growing and changing. By 2031 Sydney's population is forecast to grow by an additional 1.6 million people. Along with this is the changing demographic profile of the population with an increase in number of older persons, lone person households and oversea migrants. This indicates that not only housing growth within Sydney needs to provide an additional 664,000 homes by 2031, but the type and location of the dwellings needs to support the increasing demand for smaller, well-located homes such as apartments close to facilities and transport.

New housing production within the Sydney and the Central Coast has grown over the last five years, with approximately 22,800 additional dwellings delivered in 2014. However, it still significantly lags behind the required dwellings per annum to achieve the additional 664,000 dwellings by 2031.

The NSW Government has responded to this challenge with the announcement of the North West Rail Link (NWRL), a 23 kilometre line from Epping to Cudgegong Road that will connect with

the second stage of the Sydney Metro linking the area to Sydney CBD and west to Bankstown. The NWRL Corridor Strategy was accompanied by Structure Plans for each station along the NWRL to address the demand for growth within these areas, and to provide an integrated response to transport and land use planning along the corridor.

The site is located within the Showground Station Precinct (the Precinct) which forms part of the broader NWRL Corridor, and which will accommodate a new Railway Station. This will provide the catalyst for the area to evolve into an active transit oriented centre comprising of office, retailing, community facilities and housing.

The Showground Station Precinct will be key to accelerating the delivery of housing as part of the DP&E's Priority Precinct Program, and is expected to deliver over 5,000 new homes over the next 20 years.

The site provides a rare and substantial opportunity to provide more housing on a consolidated site within the Precinct. Increasing the permitted density and height on the subject site will capitalise on the site's strategic location and will support the delivery of increased housing choice within the Corridor.

3.0 PROPOSED PLANNING CONTROLS UNDER THE PRECINCT PROPOSAL

The Precinct Proposal has identified the site within the Residential Apartment Sub-Precinct (Sub-Precinct) south of the new station. The following principal development controls are proposed to apply to the site:

- Land Use Zone – R4 High Density Residential
- Maximum Height of Buildings – 21 metres
- Maximum Floor Space Ratio – 2.3:1

The Precinct Proposal has also indicated that a proposed new road will extend Cadman Crescent through the site to link with Middleton Avenue (see **Figure 2** below).

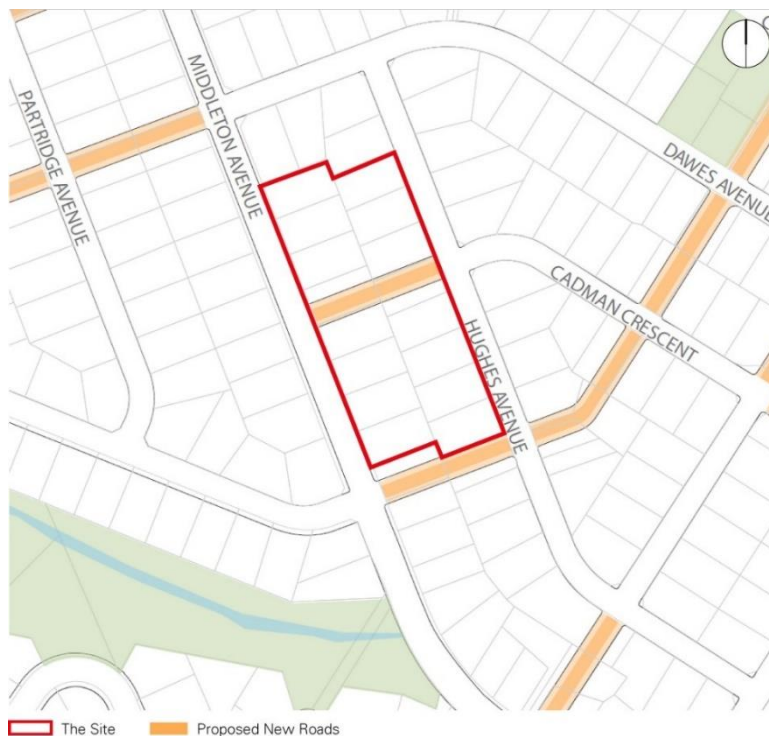
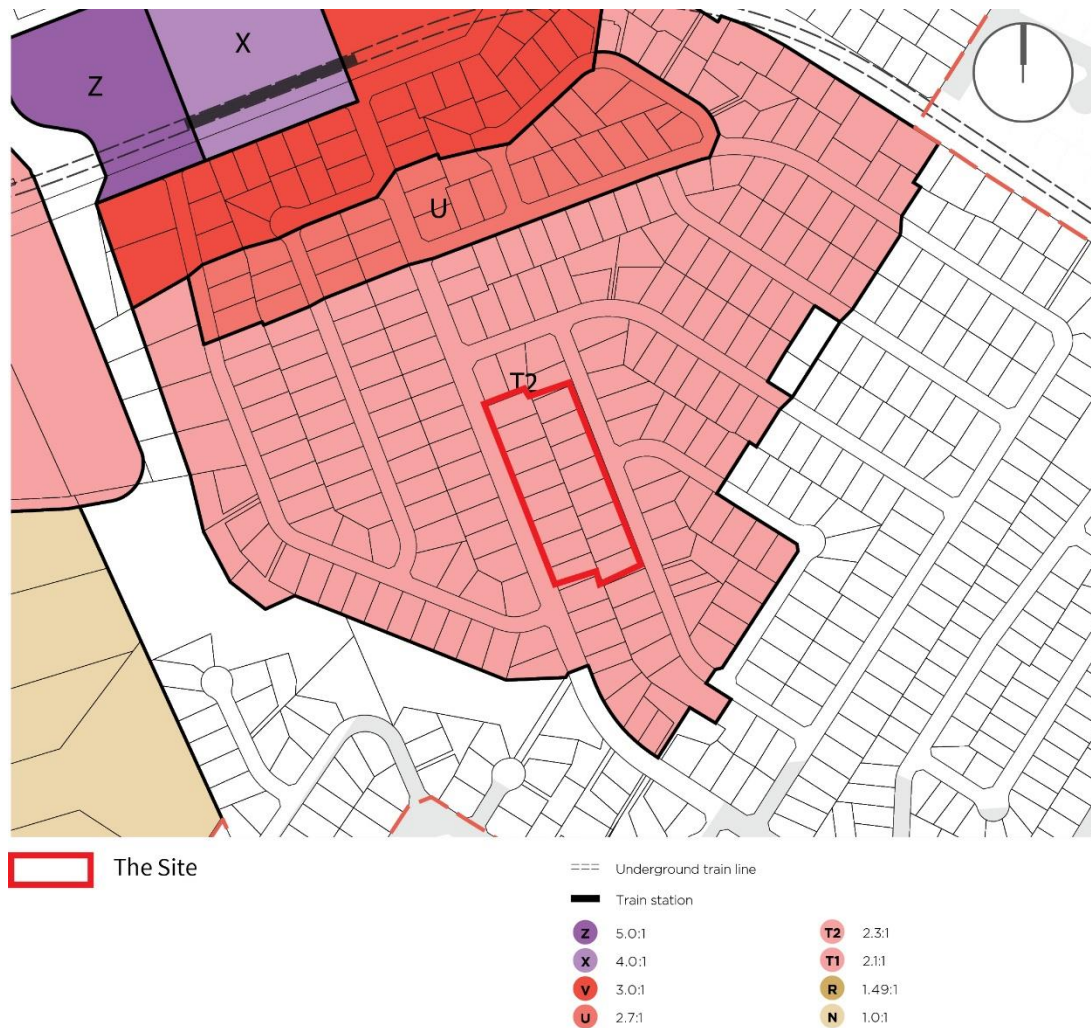


Figure 2 – Proposed new road network

Source: NSW Department of Planning & Environment

Notably, land to the north of the site on the other side of Dawes Lane is also proposed to be zoned R4 High Density Residential but will benefit from a higher height limit of 27 metres and a FSR of 2.7:1 (see FSR and height maps at **Figures 3 and 4** below). Whereas the subject site, which is less than 100 metres from the 27 metre height zone, and which is still within 400 metres of the station, has a lower height limit of 21m metres applied.

Justification for a 27 metre height limit and a FSR of 3:1 is provided in **Section 4.0** below.



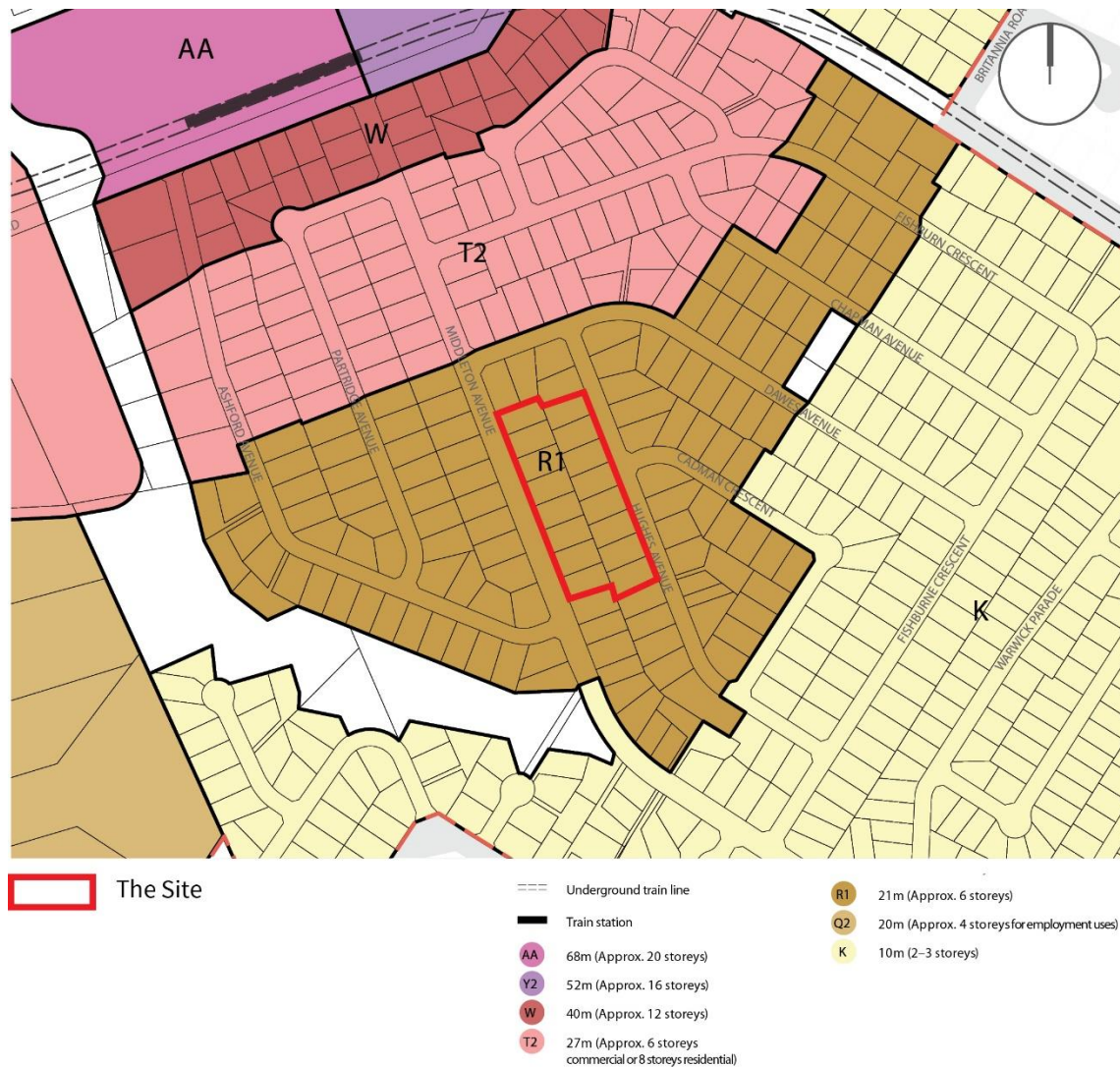


Figure 4 – Proposed Height
Source: NSW Department of Planning & Environment

4.0 SUITABILITY OF SITE FOR INCREASED DENSITY AND HEIGHT

There are a number of planning and urban design reasons to support increased densities and heights on the site as set out below.

4.1 Consistency with the built form features of the Residential Apartments Sub-precinct

The Sub-Precinct in which the site is located is immediately south of the new Showground Local Centre and will benefit from a high level of accessibility to the station, shops, open space and other facilities.

A staggered approach to heights and densities is proposed for this Sub-Precinct with heights of up to 40 metres proposed for residential areas immediately to the south of the station, and transitioning down to 27 metres for sites to the north of Dawes Avenue, 21 metres for site to the south of Dawes Avenue (including the subject site), and 10 metres for sites more than 800 metres from the new station.

This logical strategic planning and urban design approach is consistent with best practice policy where higher densities are accommodated closer to transport nodes. The common benchmark used to identify sites within walking distance of a station is 800 metres. The site is well within 800

metres of the station, and its northern boundary is within the station's 400 metre radius. Therefore, it is considered appropriate to apply a height limit of 27 metres to the site consistent with land to the north.

In addition, as shown in **Figures 3 and 4** above, some areas that are currently proposed to have a height limit of 27 metres benefit from a FSR of 2.7:1, whereas other areas within the 27 metre height zone are proposed to have a FSR of 2.3:1. To provide consistent built form outcomes it is recommended that, at a minimum, a 2.7:1 FSR apply to all sites with a height limit of 27 metres (including the subject site).

Further, the site benefits from some unique attributes which make it suitable to accommodate a greater FSR of 3:1 as set out in **Section 4.2** below.

4.2 Unique Site Attributes

One of the significant challenges for renewal is the ability to consolidate lots to create a sufficient development parcel. Due to the site's large, consolidated site area, it represents an ideal opportunity to support growth and catalyse the process of urban renewal within the Showground Station Precinct.

The size of the site also enables greater flexibility in the configuration of buildings that will result in better design outcomes, siting arrangements and modulation of buildings. This allows the site to accommodate the increased FSR without adverse amenity of built form impacts.

In addition, a roadway (an extension of Cadman Crescent) is proposed to bisect the site. It is important that Precinct Proposal incorporate additional floor space to compensate for the loss of developable land for this roadway, and to incentivise the redevelopment of the site. This will ensure that this key piece of transport infrastructure is delivered on the site to support the road network framework envisaged for the broader Precinct.

Furthermore, the site is not subject to any known constraints (such as strata ownership or heritage significance) that would constrain development. Therefore, it provides an appropriate opportunity for immediate redevelopment for the purposes of higher density housing.

4.3 Appropriate Built Form Outcome

Platform Architects have provided a site plan and massing diagrams at **Attachment A** that illustrate an appropriate built form outcome for the site based on a FSR of 3:1 and a height limit of 27 metres.

The envisioned built form will have seven storeys at the street frontage, with the eighth floor set further back to accommodate private terraces and common roof terraces. This will reduce the scale of the built form at the interface to the public domain, and will maintain a good level of solar access for the internal courtyards and the public domain. Based on this design, development at a FSR of 3:1 is capable of maintaining a high level of amenity for the residential dwellings and surrounding developments within a 27 metres height limit.

In addition, as demonstrated in the massing diagrams at **Attachment A**, a residential flat building development at a FSR of 3:1 and a height of 27 metres, is likely to meet the requirements of the ADG, and will be consistent with the envisioned key built form features for the Precinct. The site plan illustrates adequate common open space areas with internal courtyards, with most buildings orientated north-south to enhance solar access for these communal open space areas and solar penetration of residential dwellings.

4.4 Minimal Traffic Impacts

GTA Consultants have also undertaken an assessment of the potential traffic impacts with an increased FSR and height controls applied to the site. The preliminary assessment has indicated that the existing road network and proposed improvements (i.e. proposed new roads) is capable

of supporting the additional density on the site from an increase of FSR from 2.3:1 to 3:1. As indicated with the preliminary site transport assessment (**Attachment 2**), under a 2.3:1 FSR the following net increase of vehicles will be generated compared to the existing traffic:

- AM Peak: +57 trips
- PM Peak: +43 trips
- Daily: +416 trips

An increase of the FSR from 2.3:1 to 3:1 on the site will see a slight increase in trips as shown below:

- AM Peak: +23 trips
- PM Peak: +17 trips
- Daily: +178 trips

Although further assessment of the impact of the additional traffic will need to be undertaken, the increase of trips between a 2.3:1 and 3:1 FSR is considered minimal and is unlikely to have an adverse affect on the function of traffic movements within the precinct. The ability to accommodate this additional capacity should support the further densification of the Showground Station Priority Precinct. This will enable greater dwelling capacity without adverse impact on the traffic capacity of the precinct.

4.5 Access to high quality public transport

The site has excellent access to high quality public transport, being located within 400 metres of the Showground Station Precinct. The site's position on Middleton Avenue also provides the site with direct walking access to the new Showground Railway Station. The proposed Sydney Rapid Transit servicing the Showground Precinct Station will connect the area to other Strategic Centres along the Global Economic Corridor including, Castle Hill, Norwest, Macquarie Park, St Leonards, North Sydney and Sydney CBD. This highlights the site's access to surrounding retail, employment and service areas throughout the Sydney region, and its suitability for more intensive residential development than currently contemplated by the Precinct controls.

4.6 Access to retail and employment uses

The Precinct is proposed to have between 5,000m² to 10,000m² of shops and services within the new Showground Local Centre. The Local Centre is expected to provide new active ground floor uses and a new public domain. The site is within easy walking distance of the Local Centre within the Showground Precinct. The proposed new local centre providing excellent access to retail and local services for future residents of the community.

Not only will future residents on the site benefit from these services, but an increase in density would also result in increased population within the area to support the viability of local services and retail premises.

Furthermore, the proposal has indicated that the employment precinct to the west of the Cattai Creek Corridor is expected to create a further 2,300 jobs over the next 20 years. The site is also near the Strategic Centre of Norwest Business Park that currently supports a number of employment opportunities as part of the Global Economic Corridor. By supporting the intensification of the site, it will support greater access to the existing and future employment opportunities within the Precinct. This will further support the aim of the Priority Precincts program to provide new housing within proximity to these services.

4.7 Access to Social Infrastructure

The site is surrounded by key social infrastructure that supports the site's suitability for more intensive residential uses. This includes nearby open space areas such as Chapman Avenue Reserve and Cattai Creek Corridor (Cockayne Reserve), which links the residential apartment

precinct to the regional recreational and cultural facility of Castle Hill Showground. The Castle Hill Showground is expected to have a new multi-purpose facility that will accommodate a much broader range of open space, sporting, recreational, cultural, and community activities to meet the needs of existing and future residents and visitors of the precinct. This highlights the site's high level of access to these open space areas and facilitates. Increasing the permitted density and height limit on the site is consistent with the objective of the Priority Precincts program to provide housing in areas that are supported by public open space and community facilities.

5.0 CONCLUSION

There are a number of compelling planning and urban design reasons to support the increase of FSR and height on the site to 3:1 and 27 metres. These are as follows:

- it is consistent with the DP&E's envisioned built form controls Sub-Precinct and will provide a more consistent approach to FSR and height controls within the Precinct;
- the site's large site area provides an appropriate opportunity to deliver additional housing consistent with the ADG design criteria;
- the prepared site and massing plans have illustrated that an FSR of 3:1 can be adequately supported within a 27 metre height limit on the site without adverse built form or amenity impacts;
- an increased density and height control for the site would incentivise the delivery of the proposed roadway on the site and compensate for the loss of developable land;
- an increased density will not have adverse impacts on the function and movement of traffic within the precinct;
- the site is located in close proximity to the Showground Railway Station and therefore suitable to accommodate increased densities to support additional residential accommodation;
- the site will have excellent access to the proposed Showground Local Centre to provide retail and services;
- the site will have excellent access to employment opportunities within the precinct and from surrounding Strategic Centres along the Global Economic Corridor;
- the site has a high level of access to open space areas within the precinct;
- the development of a such a large site will catalyse the renewal process within Showground Station Precinct; and
- there are no identified, significant constraints on the site that would inhibit its redevelopment.

On this basis, it is requested that the DP&E amend the Showground Station Precinct to that the DP&E increase the proposed FSR from 2.3:1 to 3:1 and the maximum height limit to 27 metres on 22-36 Middleton Avenue and 5-19 Hughes Avenue, Castle Hill.

Should you have any queries about this matter, please do not hesitate to contact me on 9956 4943 or kshmuel@jbaurban.com.au.

Yours sincerely,



Kim Shmuel
Associate

