



DORAN DRIVE
PRECINCT
(SSD-15882721)

RESPONSE TO SUBMISSIONS
REPORT

DEICORP PROJECTS
(SHOWGROUND) PTY LTD

April 2022



Executive Summary

Purpose

This report presents a response to submissions received during the public exhibition of SSD-15882721 for Doran Drive Precinct and the request for additional information from the Department of Planning, Industry and Environment (DPIE). SSD-15882721 was publicly exhibited between 02 August 2021 and 30 August 2021 for a period of 28 days. A total of 15 submissions were lodged with DPIE during the public exhibition period. Of these 13 were received from public authorities, 2 from organisations.

Application SSD-15882721

This SSDA is seeking development consent for the construction of a new mixed-use development as the first stage of the Hills Showground Station Precinct to be delivered in accordance with the concept approval. Based on the Architectural Package prepared by Turner the proposed development includes:

- Six (6) levels of basement car parking accessed via a two-way driveway off De Clambe Drive;
- Four (4) residential towers above a 2-4 storey retail / commercial podium, comprising:
 - a supermarket (including fitout);
 - liquor store;
 - retail and commercial tenancies;
 - community spaces;
 - male, female and accessible bathroom facilities;
 - communal open space and associated landscaping; and
 - four hundred and thirty (430) residential units;
- Loading area and turntable for the developments use is accessed off Andalusian Way;
- Associated plant and mechanical equipment;
- Infrastructure upgrades;
- Outdoor public plaza at ground level fronting Doran Drive;
- Stormwater drainage works; and
- Signage strategy.

Supporting documents

In response to submissions a number of documents originally submitted with the SSDA have now been revised.

Table 1: Supporting Documentation

Supporting documents submitted with the SSD that have been revised		
Document	Document	Document
<i>Appendix to EIS - Updated Parking Provision Breakdown</i>	<i>Gyde</i>	Appendix 1
<i>Architectural Package w/ Colour & Material Schedule</i>	<i>Turner</i>	Appendix 2
<i>Shadow Diagrams</i>	<i>Turner</i>	Appendix 3
<i>Solar Access Diagrams</i>	<i>Turner</i>	Appendix 4
<i>Architectural Statement (SEPP 65)</i>	<i>Turner</i>	Appendix 5
<i>Signage Strategy</i>	<i>Turner</i>	Appendix 6
<i>Design Integrity Report</i>	<i>Turner</i>	Appendix 7
<i>Photomontages</i>	<i>Lunance</i>	Appendix 8
<i>Access Review</i>	<i>Morris Goding</i>	Appendix 9
<i>Lighting Report</i>	<i>JHA</i>	Appendix 10
<i>Stormwater Management Plan Civil Package MUSIC Model DRAINS Model</i>	<i>Aecom</i>	Appendix 11
<i>BASIX Report & Certificate</i>	<i>Windtech</i>	Appendix 12
<i>Landscape Report & Plans</i>	<i>Urbis</i>	Appendix 13
<i>Landscape Operation Maintenance Plan</i>	<i>Urbis</i>	Appendix 14
<i>Connecting with Country Public Art Strategy</i>	<i>Eastwood</i>	Appendix 15
<i>Woolworths Drawings</i>	<i>D & R Architects</i>	Appendix 16
<i>Retail Drawings</i>	<i>D & R Architects</i>	Appendix 17
<i>Regularity Compliance Report</i>	<i>Custom Development</i>	Appendix 18
<i>Flood & Stormwater Impact Assessment Report / Flood Model</i>	<i>ACE</i>	Appendix 19
<i>Responses to the State Design Review Panel 3&4</i>	<i>Deicorp</i>	Appendix 20
<i>Natural Cross Ventilation</i>	<i>Windtech</i>	Appendix 21
<i>Wind Tunnel Report</i>	<i>RWDI</i>	Appendix 22
<i>Traffic and Parking Assessment Report</i>	<i>Varga Traffic Planning</i>	Appendix 23
<i>Traffic Response Letter to The Hills Shire Council</i>	<i>Varga Traffic Planning</i>	Appendix 23a

<i>SIDRA MODEL</i>	<i>Varga Traffic</i>	Appendix 24
<i>Solar Light Reflectivity</i>	<i>Windtech</i>	Appendix 25
<i>Fire Statement</i>	<i>Affinity</i>	Appendix 26
<i>Section J</i>	<i>SLR</i>	Appendix 27
<i>Turntable Details</i>	<i>Australia Turntable Company</i>	Appendix 28
<i>Hills Community Memorandum of Understanding</i>	<i>Hills Community Aid</i>	Appendix 29
<i>Hills Community Aid Plan of Management</i>	<i>Hills Community Aid</i>	Appendix 30
<i>Response Letter to SINSW</i>	<i>Gyde</i>	Appendix 31
<i>Response to QIC</i>	<i>Hill PDA</i>	Appendix 32
<i>Affordable Housing Nominations</i>	<i>Bridge Housing</i>	Appendix 33
<i>Letter for Underground Corridor Protection</i>	<i>Aecom</i>	Appendix 34
<i>Acoustic Report</i>	<i>Koikas Acoustics</i>	Appendix 35
<i>Electrolysis & Stray Traction Current Report</i>	<i>Cathodic Protection Services</i>	Appendix 36
<i>Ground Water Take Assessment</i>	<i>Ei Australia</i>	Appendix 37
<i>Dewatering Management Plan</i>	<i>Ei Australia</i>	Appendix 38
<i>Monitoring Plan for Sydney Metro</i>	<i>Ei Australia</i>	Appendix 39
<i>Impact Assessment on Metro</i>	<i>Ei Australia</i>	Appendix 40
<i>Structural Assessment Report External Development</i>	<i>ABC Consultants</i>	Appendix 41
<i>Groundwater Monitoring Report</i>	<i>Ei Australia</i>	Appendix 42

1. Response to DPIE

1.1 Department of Industry and Environment

1. Built Form		
Issue/Recommendation	Project response	Appendix
<p>a) Amend the proposed buildings to ensure they are contained within the approved building envelopes, as required by Condition C3 of the Concept Approval SSD 9653.</p>	<p>Turner Architect</p> <p>The amended DA submission has reduced and/or shifted the floorplates of all buildings to ensure they sit fully within the approved building envelopes.</p> <p>Building A from Level 03 and above has been shifted south which allows for the façade articulation to sit within the approved envelopes. The podium has been reduced from 8 to 6 storeys. Building C has removed the encroachments at the north east corner and on the eastern elevation. The floorplate and apartment planning has been revised to achieve this change in built form. Building D has reduced the depth of the façade and articulation along the southern elevation so that it is within the envelope.</p>	Appendix 2
<p>b) Review and revise the proposal to be consistent with the endorsed Urban Design Guidelines (UDG), in particular, comply with the controls with respect to:</p> <ul style="list-style-type: none"> • maximum building façade lengths and articulation requirements • maximum floor plate size above 8 storeys • maximum number of storeys. <p>The Applicant is to submit revised plans and an updated Design Integrity Report, demonstrating the proposal is consistent with the UDG.</p>	<p>Turner Architect</p> <p>Façade lengths:</p> <p>The elevations of all buildings have been designed to allow for a series of modest floor plates, with short facades, and the provision of indents and stepping to mitigate any perception of bulk and scale. The materiality and façade expression varies between each of these façade lengths.</p> <p>The proposed façade lengths are compliant with the intent of the Urban Design Guidelines.</p> <p>Floorplate size:</p> <p>The floorplates of Buildings C & D have been significantly reduced above Level 8. This has allowed for the introduction of a continuous gap between Buildings C & D above Level 8, which further emphasises the slender proportions of the towers. All buildings are therefore now compliant with floorplate size.</p>	Appendix 2



Number of storeys:

The lower part of Building A has been reduced from 8 storeys to 6 storeys. The residential towers are maximum 20 storeys. All buildings are therefore now compliant with the maximum number of storeys.



2. Amenity

Issue/Recommendation	Project response	Appendix
<p>a) Review and amend the proposal to meet the Apartment Design Guide (ADG) requirements for:</p> <ul style="list-style-type: none"> • minimum solar access to apartments • communal open space, in terms of quantity identified as usable area and minimum solar access 	<p>Turner Architect</p> <p>The western façade of Building A has been rotated slightly and the depth of the façade reduced in order to further improve solar access.</p> <p>The depth of the western façade to Building B has been reduced in order to further improve solar access.</p> <p>The facades of Building C have been significantly redesigned as part of the amended submission and allow for quality solar compliance.</p> <p>The depth of the eastern façade of Building D has been further reduced in order to improve solar access. The column on the south-</p>	<p>Appendix 2</p>

<ul style="list-style-type: none"> • building separation between Building A and C • visual privacy between facing balconies and windows. 	<p>east corner of the tower has also been removed to allow increased solar access to the corner balcony.</p>	
<p>b) Submit additional solar analysis to demonstrate adequate solar access would be provided for apartments and open spaces, including:</p> <ul style="list-style-type: none"> • solar eye diagrams at 15 minutes intervals for the proposed buildings, communal open spaces and adjoining public open spaces • detailed illustration of the extent of sunlight (area and duration) received at the living area and private open spaces, particularly for Typical Apartment 4 in Building D between levels 5 and 14, Typical Apartment 1 in Building D between Levels 5 and 19, and Typical Apartment 18 in Building B between Levels 2 and 18. 	<p>Turner Architect</p> <p>The building floorplates and elevations have been amended significantly since the time of this query, in order to enhance solar compliance. The solar sun eye diagrams are provided at 15 minutes intervals and show the compliance of the revised scheme.</p>	<p>Appendix 2 & 4</p>
<p>c) Submit a revised wind assessment to demonstrate comfort criteria would be met for:</p> <ul style="list-style-type: none"> • communal open spaces and upper level balconies • outdoor dining fronting Doran Drive Plaza. <p>The Applicant is to consider the most up to date industrial practice on wind assessment as applicable to the proposed land uses.</p>	<p>RWDI Wind Engineer</p> <p>The Wind Tunnel report has been updated to incorporate the tunnel testing of the communal open spaces, upper-level balconies and outdoor dining fronting Doran Drive Plaza.</p> <p>A detailed wind investigation reveals suitable conditions for both pedestrian and sitting amenity at street level and throughout the publicly accessible spaces or outdoor communal spaces. Various mitigation measures including landscaping and architectural features have been implemented in the design to achieve the appropriate wind conditions required for passive (sitting and standing) and active space (strolling and walking) use.</p>	<p>Appendix 22</p>

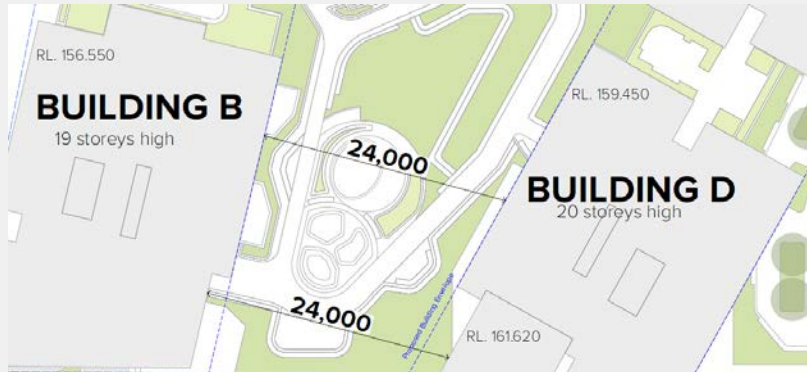
3. Land Uses and Precinct activation		
Issue/Recommendation	Project response	Appendix
a) Demonstrate how the proposal, including the land use mix and any retail strategy would achieve the strategic zoning objectives in delivering a vibrant and active new local centre.	<p>Gyde <i>Town Planner</i></p> <p>The land use mix and retail strategy for the Doran Drive Precinct, in delivering a vibrant and active new local center adjacent a metro station, were initially considered as part of the State Significant Development Application (SSDA) for the Hills Showground Station Precinct.</p> <p>Informed by a Retail and Economic Assessment (November 2019), this SSDA for the Hills Showground Station Precinct sought consent for maximum dwelling yields and gross floor areas (GFAs), with special consideration to the role of each of the individual precincts within. Noting the role of Doran Drive Precinct as a local center, it has the highest maximum non-residential GFA of the three precincts that form the wider Hills Showground Station Precinct. The proposed development for the Doran Drive Precinct has been designed to comply with the approved maximum dwelling yield and minimum and/or maximum residential and non-residential GFAs, which has directly influenced the mix of land uses that has been provided.</p> <p>As noted within HillPDA's Retail and Economic Assessment, the right retail mix is required to achieve a vibrant town center. HillPDA estimated an appropriate retail mix for the Hills Showground Station Precinct, which included a full-line supermarket as the main anchor tenant, restaurants and cafes, food specialties, non-food specialties, apparel, personal services and non-retail shop fronts. The proposed development includes a full-line Supermarket, liquor store, restaurant/ café offerings fronting Doran Drive Plaza and other tenancies of various sizes that can be used for commercial/ retail. Therefore, it is considered to provide an approximate retail mix.</p> <p>Moreover, the provision of apartments above the commercial/ retail podium, will provide an initial population to support the local center until such a time when the wider precinct has been fully developed.</p> <p>In ensuring that the proposed development creates activation, which is an essential component in creating a vibrant town center, the urban Design Guidelines prepared by Oculus and Cox, approved as part of the SSDA for the Hills Showground Station Precinct, identify specific objectives and controls for active use. The proposed development has been designed in accordance with the objectives and controls that apply to the Doran Drive Precinct as detailed with Section 4.2.10 of the submitted Urban Design Report. This includes the provision of commercial retail uses at ground level, the screening of the supermarket by other smaller active uses, the distribution of building entries across different street frontages, the consolidation of loading/ unloading and service areas and a pedestrian priority environment via a permeable ground floor plane.</p>	Appendix 1
b) Further illustrate how the design and layout of the proposed retail and	<p>Turner <i>Architect</i></p> <p>The proposal aims to create a vibrant and active mixed-use precinct.</p>	Appendix 2

<p>commercial area would achieve the desired character and design objectives in the UDG including creating a new local centre providing business and services required by the community and providing a plaza acting as the active heart of the precinct.</p>	<p>A wide range of uses are provided which allows for a quality and comprehensive hub for the community, including a large supermarket, specialty retail, a dining precinct, medical centre, gym, childcare, commercial offices, and two large community rooms.</p> <p>The facades of the non-residential podium levels have a large extent of glazing and openness. At street level the tenancies allow for direct and flush connections to the street for trade-out zones and dining areas.</p> <p>The main retail entry is reconfigured at the south-west corner, directly opposite the train station. This is now a prominent three storey glazed entry with clear sightlines into the heart of the retail centre.</p> <p>The retail levels have been reconfigured to create a strong axis from Mandala Parade to De Clambe Drive. This axis allows for an unobstructed view line between these two streets.</p> <p>The escalators have been relocated to align with this axis and sit on the direct path of travel. They are located within a large void which provides sightlines between the retail levels and assist further with intuitive wayfinding. The retail floorplates have been designed to allow plenty of natural light, and visual connections back to the surrounding streets and context.</p> <p>The proposal allows for articulation and variety in the architectural expression. The overall development is a collection of independent legible building forms, that sit together in a comfortable and playful manner.</p> <p>The high quality of landscaping finishes and Public Art within Doran Plaza further assists with creating a welcoming and memorable hub for the wider community.</p> 	
<p>c) Review and amend the signage strategy to demonstrate how future signage can be appropriately integrated into the proposed building</p>	<p>Turner Architect</p> <p>Signage has been integrated into the façade design to be visible and practical. The proposal makes sure that signage is dealt with a tidy manner, and does not detract from the façade composition and design excellence of the scheme. Deicorp have discussed the signage locations and sizes with some of the potential anchor tenants who have confirmed the suitability of locations.</p>	<p>Appendix 5</p>

design, particularly signage areas 12 & 13.	Note that signage locations 12 & 13 have been amended in order to facilitate the adjacent integrated artworks that are part of the Connecting to Country considerations.	
Provide evidence of consultation with The Hills Council on the design and use of Doran Drive Plaza, including ownership and on-going management.	Deicorp Projects (Showground) Pty Ltd Applicant Deicorp will retain the ownership of the publicly accessible plaza and maintain the park as per the attached Landscape Operation Maintenance Plan. Landscape Plan and Landscape Operation Maintenance Plan has been submitted for review and comments to Council's Parks team.	Appendix 14
4. Design Excellence		
Issue/Recommendation	Project response	Appendix
a) Review and amend the proposal in response to advice received from the State Design Review Panel (SDRP) on 4 May and 4 June 2021.	Deicorp Projects (Showground) Pty Ltd Applicant The Project was presented to the State Design Review Panel for on the 10 th of November 2021 (3 rd SDRP Meeting). Subsequently there was a fourth meeting held on the 30 th of March 2022.	
b) Seek further advice from the SDRP and its recommendations on whether the proposal achieves Design Excellence in accordance with clause 9.5 of the Hills Local Environmental Plan 2019.	Deicorp Projects (Showground) Pty Ltd Applicant The Project as presented to the SDRP on the 30 th of March 2022 displayed a high standard of architectural design, materials and detailing appropriate to the building type and location. The form, arrangement and external appearance will improve the quality and amenity of the public domain with no detrimental impact on view corridors. The development addresses: the suitability of the land, proposed uses and use mix, heritage issues / streetscape constraints, relationship with neighbouring sites in terms of separation, setbacks, amenity and urban form, bulk, massing and modulation, street frontage heights, sustainable design, overshadowing, wind and reflectivity, principles of ecologically sustainable development, pedestrian, cycle, vehicular and service access and circulation, proposed improvements to the public domain, appropriate interfaces at ground level between the building, and the public domain, excellence and integration of landscape design. The Advice Letter from the State Design Review Panel meeting on the 30/03/22 acknowledge the proposal has progressed well and no further meeting required as far as the project team addresses all the items within SDRP letter dated 8 th April 2022.	Appendix 20
The Applicant is to submit revised plans and an updated Design Integrity report detailing the proposal's response to the SDRP's advice with the Response to Submissions.	Deicorp Projects (Showground) Pty Ltd Applicant The revised Architectural Plans and Design Integrity Report have been amended to respond to the SDRP responses.	Appendix 2 & 7

5. Car Parking		
Issue/Recommendation	Project response	Appendix
<p>a) Review and revise the proposed car parking provisions with respect to the Concept Approval (SSD 9653) and the endorsed UDG, noting:</p> <ul style="list-style-type: none"> SSD 9653 MOD 1, which seeks a retail cap of 341 spaces or 1 space per 32 m2 (whichever is lower), is currently under assessment by the Department the maximum 1 space per dwelling only applies to the 409 market dwellings. Maximum car parking rates for the affordable housing is based on dwelling mix. 	<p>Deicorp Projects (Showground) Pty Ltd Applicant</p> <p>The car parking has been amended to comply with the rates determined by the UDG affordable housing & SSD 9653 MOD 1 Commercial/ Retail car parking.</p> <p>Under the affordable housing car parking requirements, 9 car parking spaces will be abandoned to comply with the UDG Affordable Housing Car parking rates. These 9 spaces will be indicated via a dotted line, which will indicate that in 10 years' time they will be reinstated back into the project.</p>	
<p>b) Clarify the shared parking arrangements between the residential visitor spaces and non-residential parking as required by Condition B1 of the Concept Approval and Control 4.2.12.4 of the UDG.</p>	<p>Deicorp Projects (Showground) Pty Ltd Applicant</p> <p>341 shared parking allocated for use of residential and non-residential (retail / commercial) visitors of the project.</p> <p>Residential visitor can access the retail / commercial parking 24X7 and will be able to access the residential lobbies from the street at any time. No direct access has been provided to the residential lifts from retail/commercial basements for security reasons. Traffic report has been updated.</p>	Appendix 23
<p>c) Review consistency between the submitted Environmental Impact Statement and architectural drawings on the allocation of car parking spaces and submit revised plans and documents.</p>	<p>Turner Architect</p> <p>The amended proposal includes for a revised configuration of basement level parking. This is due to the relocation of the travellers and revised structure/columns as part of the retail changes above. The parking provided is compliant with the approved maximum parking numbers. Turner and Gyde Town Planning have coordinated the numbers noted in our reports to reflect these latest design amendments.</p> <p>and Gyde Town Planner</p> <p>The table identifying the proposed car parking provision, as included within the Environmental Impact Statement, has been updated to reflect the architectural drawings. This updated table is appended to this response.</p>	Appendix 1 & 2

6. Community Facilities		
Issue/Recommendation	Project response	Appendix
a) Confirm the proposed arrangements (such as property transaction or lease) for a public authority or non-profit organisation to own or control the proposed community facilities.	Deicorp Projects (Showground) Pty Ltd Applicant Through a lease agreement with Hills Community Aid or similar not for profit organization will have unfiltered access to the spaces.	Appendix 29
b) Provide further information on the operation of the proposed community facility, including details of intended first operator and any draft plan of management.	Deicorp Projects (Showground) Pty Ltd Applicant Hills Community Aid been awarded the first operator for the project. A draft plan of management has been prepared in consultation with HCA.	Appendix 30
c) Submit proposed terms of a restrictive or positive covenant and proposed timing for the creation of a covenant and commencement of use for the community facility on title to secure: <ul style="list-style-type: none"> the on-going use of the premise for community facilities only any provisions to accommodate any future change of use, vacancy, end of lease, etc. 	Deicorp Projects (Showground) Pty Ltd Applicant A lease agreement has been prepared between Deicorp Projects Showground and Hills Community Aid. This lease is on the basis of \$1 per annum for 5 years, at which the agreement will be reviewed between the relevant parties or another not-for-profit organisation.	Appendix 29
7. Other		
Issue/Recommendation	Project response	Appendix
<ul style="list-style-type: none"> confirm calculation of Gross Floor Area, in particular, whether non-residential tenancy on Level 2 have been excluded from the calculation 	Turner Architect The non-residential tenancy noted on level 2 is intended as a childcare facility. This consists of large open plan flexible tenancy (noted in blue) with an associated large external terrace of approximately 638m2 which is required to meet the relevant childcare codes and regulations. This external space is open on more than one side and faces east towards Andalusian Way. As it is an external space, and it does not attract any GFA.	Appendix 2

<ul style="list-style-type: none"> nominate the proposed affordable housing units and confirm the proposed delivery method and dwelling mix 	<p>Deicorp Projects (Showground) Pty Ltd Applicant</p> <p>A management agreement between Bridge Housing and Deicorp Projects Showground Pty Ltd will be undertaken for a 10-year period. Refer to the submitted letter from Bridge Housing allocating the nominated affordable housing units.</p>	Appendix 33
<ul style="list-style-type: none"> amend the architectural drawings to include sufficient dimensions to confirm separation distances 	<p>Turner Architect</p> <p>Turner has provided further dimensions and annotation on the plans to clearly illustrate compliance with building separation. Within the amended submission Levels 06 & 07 in Building A have been significantly reduced in order to provide a minimum of 24m building separation between habitable uses in Buildings A and B within the first 4 storeys above the podium courtyard.</p> <p>We confirm that the building separation between Buildings B & D within the podium courtyard are 24m or greater between habitable uses.</p> 	Appendix 2
Clarify the use of the areas on Level 01, adjacent to amenity toilets and retail waste holding room.	<p>Turner Architect</p> <p>Turner has provided further annotation on the plans to clearly illustrate the use of all BOH areas and amenities on Level 01. Refer to the retail tenancy plans prepared by D & R.</p>	Appendix 17

2.2 The Hills Shire Council - Letter dated 3 September 2021

Unit Mix		
Issue/Recommendation	Project response	Appendix
The proposal is inconsistent with other Residential Flat Buildings approved within the Showground Precinct where at least 20% of the total number of dwellings contained in the development is provided with 3 or more-bedroom dwellings. Concern is raised to the provision of family friendly units available for future occupants of the development which is contrary to Council's local housing diversity provision for Priority Precincts.	<p>Gyde Town Planner</p> <p>Other residential flat buildings approved in the wider Showground Precinct are subject to the Hills DCP which requires at least 20% of the total number of dwellings to be 3 or more dwellings. The Hills DCP, however, does not apply to the Hills Showground Station State Significant Development Precinct (the SSD Precinct). Instead, the SSD Precinct is subject to a Stage 1 Concept Development Approval and detailed Urban Design Guidelines (UDGs) which are enlivened by the Stage 1 Concept Development Approval. The UDGs require at least 10% (to the nearest whole number) of the total number of dwellings within the Doran Drive Precinct to be 3+ bedrooms. The proposed development provides 43 x 3+ bedroom dwellings. This equates to 10% of the total number of dwellings. The</p>	

	<p>proposed development is consistent with the UDGs and the Stage 1 Concept Development Approval.</p> <p>More broadly, it is worth noting that a Housing Market Analysis prepared by Atlas Urban Economics and submitted with this development application demonstrates that there is a mismatch in housing supply and likely housing needs as smaller households (i.e., couples without children and lone person households) residing in larger 3- and 4-bedroom houses have little local choice should they wish to downsize. A similar observation was made in the Hills Shire Council's draft Local Housing Strategy (LHS). The Housing Market Analysis demonstrates the policy basis that underpins the statutory apartment mix control that applies to the site.</p>	
Setbacks / Active Street Frontages		
Issue/Recommendation	Project response	Appendix
<p>Whilst it is acknowledged that Council's DCP does not strictly apply to this State Significant Development Application, Council's DCP was made to inform the desired future character of the Showground Station Precinct. The DCP requires active street frontages on all property boundaries and a 3m street setback to De Clambe Drive and 5m upper-level setback to all other street frontages. The intent of the controls is to set taller building elements back from the street to reduce building scale and bulk and to facilitate a landscaped streetscape that can accommodate larger trees.</p> <p>The proposal includes significant built forms that comprise reduced setbacks with limited opportunities for landscaping. The basement carpark is proposed with minimal setbacks to all property boundaries which do not allow for the provision of deep soil planting to accommodate larger trees, particularly along the northern property boundary. The proposal also includes the removal of five street trees to allow for vehicular access and entry from De</p>	<p>Gyde Town Planner</p> <p>The fact is that the DCP does not apply to the SSD Precinct and as noted above, very detailed Urban Design Guidelines apply instead.</p> <p>The proposed development complies with the building and basement setbacks prescribed by the Urban Design Guideline as follows:</p> <ul style="list-style-type: none"> • 3-metre outdoor dining setback to Mandala Parade, Andalusian Way and De Clambe Drive; • 0-metre primary setback to all frontages; and • 3-metre secondary setback to all frontages. • Nil basement setback to all frontages <p>Hard and soft landscaping (landscaping above structure) is proposed in the 1,400m² Doran Drive Plaza and communal open space areas at Levels 2, 3, 6, 8 and 9. The proposed landscaping will achieve 40% and 45% canopy tree cover in accordance with the requirements of the Urban Design Guidelines. Street trees will be retained in the deep soil areas in the verges surrounding the site, as per the Urban Design Guidelines. The landscape plans prepared by Urbis should be referred to for further details on the proposed landscaping and SESL Australia's 'Soil Specification Design Report' submitted with the SSDA confirms that the soil depths proposed within the landscaped areas are suitable to support the growth of medium-sized trees as shown in the detailed landscape plans.</p> <p>The proposed vehicular access arrangements off De Clambe Drive and Andalusian Way inevitably result in the removal of some of the existing street trees. These street trees were planted as part of the early works for the Hills Showground Station Precinct as a whole, before the detailed design of the proposed development was known. Therefore, no matter where</p>	

<p>Clambe Drive. The location of this vehicular access results in reduced opportunities for not only landscaping but also activation of the northern street frontage. This is not in keeping with the desired future character of the Showground Station Precinct which envisaged an active street frontage and a more sensitive interface to the RE1 zone land to the north.</p>	<p>the access is located, some street trees would be required to be removed. The UDGs identified proposed zones in which parking and loading dock entries / exits may be located. This included one off De Clambe Drive and Andalusian Way each. Vehicle access to the proposed development is consistent with the endorsed UDGs.</p> <p>The Urban Design Guidelines and subsequently the subject development application for the Doran Drive Precinct have been designed to integrate with the Showground through the alignment of Doran Drive Plaza and the provision of active shopfronts and a through site link that connect with 'The Promenade' as identified in the draft Castle Hill Showground Master Plan. According to the draft Master Plan:</p> <p><i>"The Promenade will form an activate transition between the Metro station, the adjoining Neighbourhood Centre and the Showground. This proposal is a response to the existing open space of the Showground and future context of the Metro Development."</i></p>	
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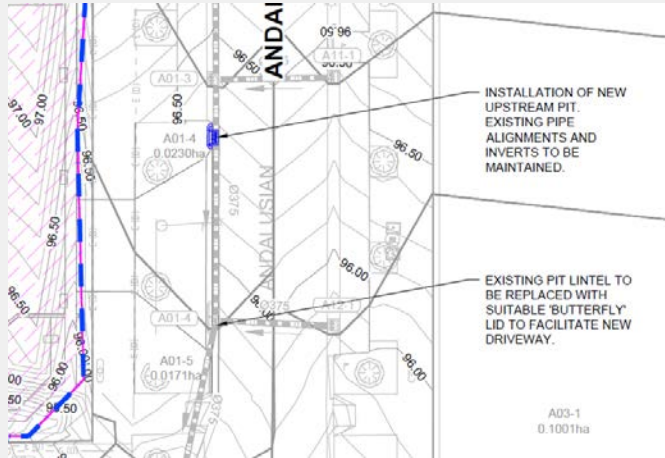
Car Parking

Issue/Recommendation	Project response	Appendix
<p>Council's DCP requires 1 space per 25m² GFA for retail floor area. For the development, 438 car spaces are required. The proposal includes 341 retail car parking spaces which results in a shortfall of 97 car parking spaces to this control. Concern is raised to the proposed development with regard to the provision of sufficient car parking for the supermarket. Sufficient parking is to be provided for future retail patrons that live within the locality.</p>	<p>Gyde Town Planner</p> <p>The proposed development provides 341 carparking spaces for the future retail patrons which aligns with the SSD-9653-Mod-1 approved on 10th December 2021.</p> <p>Additionally, the proposed development is atypical of The Hills in that it is within a TOD precinct and as such, it is apparent that it should not have the same retail car parking rate as places that are not supported by high frequency public transport infrastructure. The number of retail car parking spaces strikes a balance between not unnecessarily promoting the use of private motor vehicles, while at the same time ensuring there is adequate car parking to cater for the wider trade catchment area to ensure that overflow car parking does not occur on the surrounding streets.</p>	

Building Separation

Issue/Recommendation	Project response	Appendix
<p>The Apartment Design Guide requires residential flat buildings to be provided with a 12m building separation for up to four storeys in height, a 18m separation for 5 -8 storeys and 24m separation for 9 storeys and above. The internal building separation is required to comply with the</p>	<p>Turner Architect</p> <p>The amended submission has embraced these comments and the floorplate of Levels 06 & 07 in Building A have been significantly reduced. This amendment provides a minimum of 24m building separation between habitable uses in Buildings A and B for levels that are more than 4 storeys above the podium courtyard. Please refer to plan DA-110-220 Roof level for Building Separation distances.</p>	<p>Appendix 2</p>

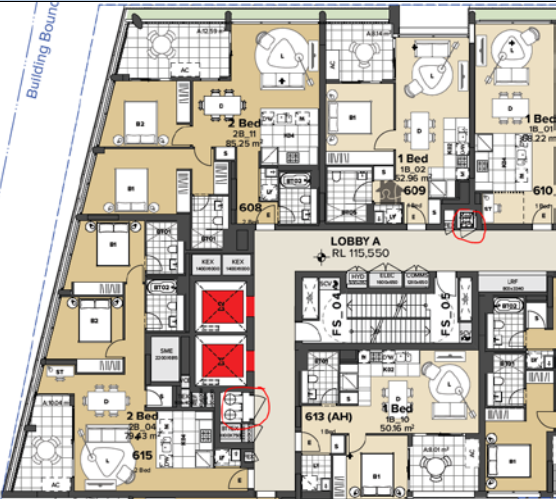
minimum design criteria in the Apartment Design Guide.		
The Hills Shire Council – Letter dated 14 September 2021		
ENGINEERING		
Issue/Recommendation	Project response	Appendix
1. Stormwater comments		
<p>1.1</p> <p>The capacity of the stormwater system into which stormwater from the development discharges into must be checked and analysed. Please note that the check/analysis shall be carried out to the legal point of discharge to ensure that the street pits will not be surcharged during minor events up to the 10 years ARI storm event. Therefore, the Rainfall Intensities shall be updated and consistent with the section 4.10 Council's Design Guidelines Subdivisions/ Developments. Similarly, the duration of the analysis shall be extended to 72 hours. Also, the overflow depth for major storm event shall be Max 200mm not 300mm.</p>	<p>Aecom Civil Engineer</p> <p>The stormwater comparison conducted for the proposed development includes the existing drainage network surrounding the lot, down to the network on De Clambe Drive which ultimately discharges to a constructed swale and precinct basin.</p> <p>The post-development model was run for the 20%, 10% and 1% AEP storms, for all durations up to and including 72 hours.</p> <p>There was no pit surcharge from the post-development model for either the 20% or 10% AEP storm events.</p> <p>As per section 4.10 of Council's Design Guidelines Subdivisions/Developments, stormwater analysis has been carried out with the latest BOM data (IFD 2016) utilizing the AR&R19 methodology for ILSAX model within the software DRAINS.</p> <p>The proposed development does not contribute to overland flow within the roads for major storm events (1% AEP) i.e., there is no increase in overflow depth due to the development.</p> <p>The DRAINS model for the post-development scenario is provided to Council for review along with extracts of the inputs and output.</p>	Appendix 11
<p>1.2</p> <p>Any proposed work on council's land/road due to the proposed development shall be prepared and provided in accordance with Council's Design Guidelines Subdivisions/ Developments and Works Specifications Subdivisions/Developments.</p>	<p>Aecom Civil Engineer</p> <p>Only minor works are proposed within Council's land, consisting of a driveway layback and access driveway, with minor modifications to the existing drainage network as a result.</p> <p>The driveway grading and layback details are to be as per Council standard details.</p> <p>Drainage modifications are detailed in response Item 1.3.</p> <p>The drainage connection, for controlled discharge from the site, is to an existing pit located within the south-western corner of the lot.</p> <p>These details are presented on drawing sheets 0621 and 0951.</p>	Appendix 11
<p>1.3</p> <p>Where the proposed</p>	<p>Aecom Civil Engineer</p>	Appendix 11


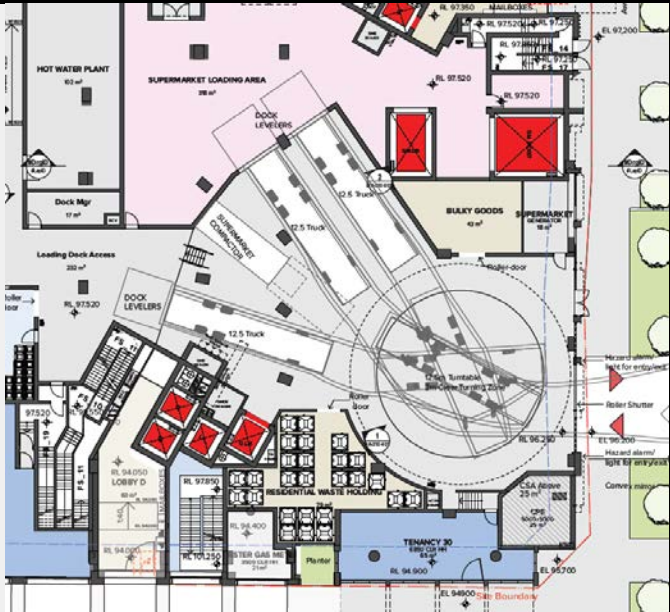
<p>driveway is impacting the existing stormwater pit. The kerb inlet pit must be replaced with a grated/ butterfly lid pit integrated into the new driveway and a new kerb inlet pit must be design upper slope of the butterfly pit.</p>	<p>Drainage modifications are presented on the screenshot below, showing the proposed pit type change and installation of the new upstream pit.</p>  <p>These modifications have been incorporated into the proposed developments post-development drainage model and it has been found that there are no losses to the network's drainage capacity because of the changes.</p>	
<p>1.4 The OSD and Rainwater tanks shall be shown on the architectural plans and relevant sections plans. OSD and rainwater tanks are permitted on common areas only. Rainwater tank and OSD underneath the tenancy/habitable area will not be supported.</p>	<p>Turner Architect We confirm that the OSD and Rainwater tanks have been revised on the architectural plans such that the tanks are accessed from common areas only. The Rainwater tank and OSD are not underneath any tenancy/habitable area and now comply with the requested change.</p>	<p>Appendix 2</p>
<p>1.5 Any proposed work on council's land/road due to the proposed development shall be subject/ requires separate approval from Council beforehand via Section 138 of the Roads Act 1993.</p>	<p>Noted</p>	
<p>1.6 When OSD, Water sensitive urban design elements and Rainwater tanks are provided for the development Positive Covenant/Restriction-as-to-use – legal protection placed on a property title requiring owners to repair and maintain the OSD systems.</p>	<p>Noted</p>	
<p>1.7 Stormwater and civil works shall be completed as part of stage 1 of the development.</p>	<p>Noted</p>	
<p>2. Flooding comments</p>		

2.1 The flood report and flood model was referred to Council's Waterways team for review and comments (i.e refer to the attached email). Therefore, further comments might be provided at a later stage.	Noted	
3. Internal Traffic and circulation comments		
3.1 The design of the Driveways, parking modules, circulation roadways and ramps (including obstruction, and curved roadways and ramps), and sight distance shall be designed in accordance with relevant AS/ NZS 2890.1, AS 2890.2 and AS/ NZS 2890.6.	Varga Traffic Planning Traffic Engineer Please Refer to Attached Traffic Response Letter Dated 10 th March 2022.	Appendix 23a
3.2 The parking modules and aisle width shall comply with each respect user class as per table 1.1 and figure 2.2 of the AS/ NZS 2890.1. The aisle width shall be provided on the basement plans and at least provide the typical parking modules.	Varga Traffic Planning Traffic Engineer Please Refer to Attached Traffic Response Letter Dated 10 th March 2022.	Appendix 23a
3.3 A cross section plan of driveways and RAMPs will need to be provided on plan; it must detail compliance gradient and changes of grade with the relevant AS/ NZS 2890.1 and AS 2890.2	Turner Architect Cross sections through the driveways and ramps have been provided as part of the amended submission. These details compliant gradient and changes of grade with the relevant AS/ NZS 2890.1 and AS 2890.2. Please refer to drawings DA-820-001, DA-820-002, DA-820-003, DA-820-004 and DA-820-005.	Appendix 2
4. Geotechnical comments		
4.1 Given the proximity of the proposed basements to the groundwater observation (i.e fluctuating between RL75.60m AHD and RL 90.50m AHD) as stated in Appendix 55 - Geotechnical Investigation prepared by Ei Australia , and the lowest basement is set at RL.70.2m AHD; the applicant's Geotechnical Engineer shall investigate the impact of the seepage/groundwater/water table on the proposed basements design, prior to excavation, during	Ei Australia Geotechnical Engineer A Groundwater Take Assessment has been completed by Ei Australia. Please refer to the attached Report dated 5 th November 2021. Based on the findings of the Ground Water Take Assessment and within the limitations of available data, EI concludes that: <ul style="list-style-type: none">Construction phase groundwater take will be approximately 4.32ML / 365 days based on the following assumptions:Continuous dewatering will take place at BEL, and construction of the basement will take 365 days;The perimeter shoring wall is assumed to be	Appendix 37

construction of the Basements, post construction phase, and shall provide a recommendation/conclude whether the basement shall be designed as a "tanked basement".	<p>free draining;</p> <ul style="list-style-type: none"> Groundwater inflow rates are constant during the excavation and construction of the basement; Groundwater within bedrock is confined to any defects within the rock and these are expected to be drained of groundwater as the excavation proceeds, resulting in a considerable reduction of seepage rates into the excavation overtime. Hence, EI considers that the modelled groundwater inflow rates into the excavation (which are constant overtime) are a conservative, upper-bound estimate. Measured groundwater levels which were used as the basis of our model should be considered in relation to the monitoring well depth, screening interval and number of defects contained within the excavated bedrock. Considering the above, we expect that control of groundwater inflows into the basement during and permanently after construction will be feasible using a suitably designed sump and pump system and hence tanking of basement structures will not be required for groundwater control. Should any design or construction conditions differ from that adopted in this report; this assessment report should be reviewed and updated as required. 	
4.2 Note that Sydney Metro will be required to comment about the possible impact/zone of influence to their tunnels.	<p>Deicorp Projects Showground Pty Ltd Applicant</p> <p>Applicant and Sydney Metro Corridor Protection planners are working together for the possible impacts and various mitigation measures.</p>	
WATERWAYS		
Issue/Recommendation	Project response	Appendix
Council's Waterways Team have reviewed your application and have advised that several design storms, durations and all 10 temporal patterns were assessed as part of the submitted flood study. However, the TUFLOW model uploaded has only 1% AEP 20min (Storm 1) model results. Council's Waterways Team have requested that for their review purposes, it is appropriate to have access to all the results (both existing and developed scenarios) which were indicated in the Flood Study Report. Once	<p>ACE Engineers Flood Engineer</p> <p>Requested TUFLOW model was submitted to council on 20th September 2021.</p> <p>Further to that, additional information was requested by Council's Waterways Team on 6 October 2021. Following information was resubmitted by the applicant on 12th October 2021:</p> <ul style="list-style-type: none"> 1D results for all the modelled runs 1D network layer used in TUFLOW model (1d_nwk_Pipes_MI.MIF) 	Appendix 19

the information is submitted, Council staff will require two weeks to review the hydrology/hydraulic models from the day of receiving the requested results files.		
RESOURCE RECOVERY / WASTE MANAGEMENT		
Issue/Recommendation	Project response	Appendix
<u>Residential</u>		
<ul style="list-style-type: none"> Residential waste will be serviced by Council's domestic waste Contractor. Council will apply the following waste allocation based on 443 430 apartments <ul style="list-style-type: none"> 60 litres of garbage waste is allocated per unit per a twice a weekly collection. Garbage is compacted at 2:1. 30 litres of recycling is allocated per unit per a twice a weekly collection Therefore the site will be allocated a total of 12 x 1100 litre garbage and 12 x 1100 litre recycle bins. 	<i>Noted.</i>	
<u>Residential - Waste Chutes/ Garbage Holding Rooms</u>		
<ul style="list-style-type: none"> It is noted that a separate bin cupboard sized to store a 240litre bin has not been provided next to the chute openings on every residential floor. This is usually required to allow the disposal of items unsuitable for chute disposal. Additionally, the bin cupboard allows for a third waste stream to be implemented into residential flat buildings. As the State Government has mandated FOGO for all residential properties, the bin cupboard is anticipated to be used to store waste bins to accommodate FOGO waste. This is resourceful space which 	<i>Turner Architect</i> We confirm that there is a bin cupboard located at each floor of the residential buildings. This is in addition to the garbage and recycling chutes. Refer to the Waste Report by Elephants Foot which explains how best practice has been achieved in the design of this building. Both items are located close together and will have adequate signage to encourage appropriate use.	Appendix 2

<p>can be utilized as it is already provided within the building design.</p>	 <p><i>Building A – typical floor plan</i></p> <p>Elephant Foot Waste Consultant</p> <p>Space for 1 x 240L bin for FOGO waste has been provided on each residential level. This has since been discussed and confirmed with Council's Waste Officer Frances Arce on the 24th September 2021.</p>	
<ul style="list-style-type: none"> Ideally, garbage holding rooms should be located to open directly onto the waste loading bay. There are concerns as the garbage holding room and the truck service bay appear to be on different levels within Level 1. The stairs demonstrated to access the loading dock area indicates that there is not a suitable bin transfer path from the waste holding room to the rear of the waste collection vehicle. Bins cannot be transported down stairs to reach the waste vehicle for servicing. It is current form Council waste contractor (as well as the private contractor servicing commercial waste) will not be able to empty the bins as they cannot be wheeled down stairs. For ease of servicing it is recommended that the waste rooms are relocated to be at the same level of the loading bays and for the 	<p>Turner Architect</p> <p>The residential waste and bulky goods holding room have been relocated to open directly into the loading dock and have a flush interface with the loading dock. This will facilitate fast and efficient garbage collection. Please note, residents will not be allowed to access the loading dock. Waste transfer from the basement bin rooms will be managed by the strata manager.</p> <p>Non-residential waste will be collected by a private operator. The associated waste holding room is located near to the loading dock in a location that is convenient for the retail BOH lift and the BOH service corridors. A Dock lever is provided to facilitate level change to ensure easy pick up by the private collector. The position of the non-residential waste holding room has been reviewed and approved accordingly by the Waste Consultant.</p>	<p>Appendix 2</p>

<p>residential garbage holding room and bulky good storage to open directly onto the loading bay.</p> 		
<ul style="list-style-type: none"> Similarly, to the waste holding room, the bulky goods storage room should be located to open directly onto the waste loading bay. Currently there does not appear to be adequate space within the loading dock for the presentation of bulky good for collection. Also, as mentioned in the above point, Council's waste collection contractor will be required to carry waste in excessive distance down the stairs to place waste into the rear of the waste vehicle. To provide safe and convenient waste servicing the bulky goods storage room should be relocated to open directly onto the waste servicing bay and at the same level. 	<p>Turner Architect</p> <p>The residential bulky goods storage has been relocated to open directly into the loading dock and have a flush interface with the loading dock. Please note, residents will not be allowed to access the loading dock. Bulky goods transfer will be managed by the strata manager from the apartments directly.</p>	
<p>Residential - Waste Vehicle and Access Loading</p>		
<ul style="list-style-type: none"> Council usually requires a dedicated waste loading bay to be provided for the residential waste vehicle and for it to be demonstrated on plans. This is to ensure that there are no conflicts with other waste vehicles at time of servicing waste 	<p>Deicorp Projects Showground Pty Ltd Applicant</p> <p>Under Stata Scheme, a loading dock manager, center manager and strata manager will be responsible to coordinate the day-to-day operation and scheduling of deliveries and waste collection. This will ensure that the council's waste collections are always prioritised.</p>	

<p>collections. Residential waste collections should be priorities as Council's waste contractor have set schedules and are dependent on operational times for tipping.</p>		
<ul style="list-style-type: none"> • Turntables are not typically supported within The Hills Shire Council. Council's standard is for vehicular access and loading designs to rely on a typical three-point turn arrangement to enable waste collection vehicles to enter and leave the site in a forward direction. This arrangement is far more cost effective for all stakeholders and also avoids/reduces ongoing operational risks. Turntables are costly to install and maintain throughout their lifetime. According to WSROC's Residential Flat Building Waste Collection Infrastructure Fact Sheet turntables may incur \$32,000 to \$101,000 upfront costs with \$1,000 to \$3,000 per annum maintenance costs over an expected lifetime of 10 years. 	<p>Deicorp Projects Showground Pty Ltd Applicant</p> <p>Proposed turntables support the development needs to maximise use of the available limited space. The 12.5 diameter truck turntable will be supplied and installed by Australian Turntable Company, a world recognised, ISO accredited company. Deicorp has installed many turntables within our developments, and we can say with confidence that the products that have been supplied, installed, and maintained by Australian Turntable Company have been of a superior standard. Apart from that, turntable ensures that vehicles enter and exit loading docks in a forward direction and improves drivers' vision reducing public or property accidents.</p>	<p>Appendix 28</p>
<p>Furthermore, if the turntable malfunctions or does not operated at full capacity there is the potential for a significant impact on waste collections being able to be completed. Additionally, if this occurs at the time when the waste vehicle is positioning itself to enter the loading bays, the waste vehicle will be required to exit reversing out of the site. This potentially could cause significant traffic or safety issues.</p>	<p>Deicorp Projects Showground Pty Ltd Applicant</p> <p>In an event of a breakdown, the turntable function will switch to effortless manual function, and it will be manually operated by the loading dock manager whilst repairs are being conducted by the by Australian Turntable Company. Refer to the Australian Turntable Details pages 14 and 15 for details.</p> <p>This ensures loading dock function does not delay in any event.</p>	<p>Appendix 28</p>

Commercial		
<ul style="list-style-type: none"> Woolworth's supermarkets typically dispose waste into metal bins which are required to be serviced via a front lift waste vehicle. Operational space should be considered to ensure that if this is the case the waste vehicle will be able to lift the bin and empty its contents. 	<p>Turner Architect</p> <p>We confirm that the loading dock has been designed to provide adequate loading bays and compactors for the Woolworths Tenancy. The clearance with the loading dock has been reviewed and approved by both the traffic and waste consultants. The configuration of the loading dock has been discussed with Woolworths internal design team and has met their approval. The operational space provided for supermarket waste has been reviewed and deemed sufficient.</p>	
Commercial - Waste Vehicle and Access Loading		
<ul style="list-style-type: none"> Same concerns which have been raised for the residential component also apply for the commercial waste component. <p>To achieve a higher design and operational outcome for waste management is it strongly recommended that the above-mentioned points are taken into consideration and amendments are applied.</p> <p>The bin storage cupboard is considered to be a resourceful space and will assist in the implementation of a third waste stream e.g., FOGO. This will prove extremely beneficial as FOGO is set to be mandated by 2030.</p> <p>All waste collections rooms provided to directly open onto the loading bay will maximise efficiency in waste servicing. It will also provide a safer waste transfer path if waste rooms are also located on the same level as the loading bays. Waste is an essential service and must be planned and designed to achieve the highest outcome.</p>	<p>Turner Architect</p> <p>Non-residential waste will be collected by a private operator. The associated waste holding room is located near to the loading dock in a location that is convenient for the retail BOH lift and the BOH service corridors. The position of the non-residential waste holding room has been reviewed and approved accordingly by the Waste Consultant.</p> <p>FOGO Bins has been integrated into the commercial waste room design and located in the commercial bin room calculation.</p> <p>Elephant Foot Waste Consultant</p> <p>The Operational Waste Management Plan for the precinct (produced by Elephants Foot - Revision D, dated 08/07/21) includes 25 x FOGO bins for retail/commercial waste.</p>	Appendix 2
ENVIRONMENTAL HEALTH		
Issue/Recommendation	Project response	Appendix
No objections raised from Council's Environmental Health section. However, the	<p>Koikas Acoustic Acoustic Engineer</p> <p>Any impacts onto the development from the</p>	

Applicant is requested to address acoustic measures required to mitigate any land use conflict impacts with The Showground.	Showground has been acknowledged in the DA submitted acoustical report. Recommendations to mitigate the acoustic impacts have been investigated in the Acoustic Report and incorporated into the development.	
ASSET MANAGEMENT, TRAFFIC AND PARKS		
Issue/Recommendation	Project response	Appendix
<ul style="list-style-type: none"> The Traffic report submitted indicates that the traffic generation of the proposed development is consistent with the approved Traffic and Transport Assessment for the concept State Significant Development Application (SSDA) for the Hills Showground Station Precinct prepared by SCT Consulting. Therefore, no comments will be provided on the traffic generation from the proposed development and its impact to the surrounding road network. 	Noted.	
<ul style="list-style-type: none"> A SIDRA model should be provided in De Clambe Drive at the entrance to the proposed apartment to demonstrate that the traffic turning right from De Clambe Drive into the proposed development will not cause any queue in De Clambe Drive. 	Varga Traffic Planning Traffic Engineer Please Refer to Attached Traffic Response Letter Dated 10 th March 2022.	Appendix 23a
<ul style="list-style-type: none"> A median island shall be considered to restrict the right turn movements at the access of the proposed development if a queue is likely to occur in De Clambe Drive or in the car park of the proposed development due to the right turn movements. 	Varga Traffic Planning Traffic Engineer Please Refer to Attached Traffic Response Letter Dated 10 th March 2022.	Appendix 23a
<ul style="list-style-type: none"> Turning path diagrams shall be provided to demonstrate that a 12.5m heavy vehicle can turn left from Andalusian Way into the loading dock safely. 	Varga Traffic Planning Traffic Engineer Please Refer to Attached Traffic Response Letter Dated 10 th March 2022.	Appendix 23a
<ul style="list-style-type: none"> Clarification is sought regarding the detail of the public art proposed. The 	Deicorp Projects Showground Pty Ltd Applicant The extent of maintenance responsibility for the Doran	

public art is required to detail its fit for the space and maintenance obligations that may present for Council in the future.	Drive Plaza will be clearly defined on the ground by the developer. The publicly accessible plaza and public art will always remain in private ownership. The detailed design of the fountain will be created by an artist along with the team of experts at the construction stage.	
<ul style="list-style-type: none"> If new services are required in Carrington Road, please contact Council's Infrastructure and Transport Planning section for proposed surface levels to assist with their placement. 	<p>Varga Traffic Planning Traffic Engineer Please Refer to Attached Traffic Response Letter Dated 10th March 2022.</p>	Appendix 23a

2.3 Sydney Metro

Comments		
Issue/Recommendation	Project response	Appendix
a) The letter in Appendix 64A – Development Near Rail Corridor identifies the requirements of the Sydney Metro At Grade and Elevated Sections Corridor Protection Guidelines as the relevant document for works around the corridor. However for the underground sections of the network, the Applicant must provide an assessment or statement demonstrating compliance with the Sydney Metro Underground Corridor Protection Technical Guidelines v2 (2021).	<p>Aecom Civil Engineer Letter has been amended to address the Sydney Metro Underground Corridor Protection Technical Guidelines 2021</p>	Appendix 34
b) In the acoustic report for the proposed mixed-use development (Appendix 54), Section 1 states that Koikas Acoustics has determined that a	<p>Koikas Acoustics Acoustic Engineer Refer to Attached Report</p>	Appendix 35

<p>rail vibration assessment from the Hills Showground Station is required at the DA stage. However, such an assessment is not found in the report. A rail vibration and ground borne noise assessment is required.</p>		
<p>c) In Section 5.1.1, no ISEPP/DOP ground borne noise or vibration requirements for the proposed development are stated. The requirements are provided in Section 3.6.3 and 3.6.4 of the ISEPP/DOP and should be included in the assessment.</p>	<p>Koikas Acoustics Acoustic Engineer Refer to Attached Report</p>	<p>Appendix 35</p>
<p>d) Considerations for assessing operational noise and vibration impacts from rail operations on the development are available for the developer in Section 9.3.2 of the Sydney Metro Underground Corridor Protection Technical Guidelines.</p>	<p>Koikas Acoustics Acoustic Engineer Refer to Attached Report</p>	<p>Appendix 35</p>
<p>e) The basement and foundations of the proposed development and their relative locations to the underground rail corridor and the station should be considered in the ground borne noise and vibration assessment.</p>	<p>Koikas Acoustics Acoustic Engineer Refer to Attached Report</p>	<p>Appendix 35</p>
<p>f) There is no evidence provided that the structural design allows for</p>	<p>Cathodic Protection Services Electrolysis Consultant Refer to the revised Electrolysis & Stray Traction Current Report Page Number 8, Section 4.8.</p>	<p>Appendix 36</p>

an electrolysis monitoring point. Since this development is in close proximity to the Metro North West line, there is a high change of the building structure attracting stray dc currents.		
g) There is no evidence that insulated fitting have been used for incoming services. (together, Additional Information).	ABC Consultants Structural Engineer Refer to the Structural Assessment Report External Development Adjacent TfNSW Railway Corridor as there is an allowance for the stray current report requirements, see Section 6.7 page 18.	Appendix 41

2.4 Response to SINSW

1. Primary and Secondary School Capacity		
Issue/Recommendation	Project response	Appendix
<p>SINSW uses population and dwelling projection data provided by the Department of Planning, Industry and Environment (DPIE) as the basis for school planning. These form the Department's Student by Area (SbA) projections. This data allows SINSW to assess schools within an area or region to identify the best way to distribute student numbers and deliver new and upgraded facilities.</p> <p>SINSW has taken the proposed residential growth in the Doran Drive Precinct into consideration in its planning to ensure provision of education infrastructure to meet the anticipated primary and secondary school enrolment demand. Further, upgrades have been recently completed or in planning for Castle Hill, Excelsior, Matthew Pearce and Samuel Gilbert Public Schools. As a result, SINSW has determined that both primary and secondary level enrolment demand associated with the proposal</p>	<p>Gyde Town Planner Refer to the attached letter addressing concerns raised by SINSW.</p>	Appendix 31

<p>can be met through existing facilities in the surrounding locality.</p> <p>SINSW is committed to working with DPIE and Council to ensure that public schools are supporting community needs and continue to be appropriately resourced to respond to changes to its student population. Any growth and change identified for the locality will need to be considered carefully by SINSW with respect to the education needs of the community. For this reason, school intake areas are reviewed regularly to balance demand and capacity across the area.</p>		
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2. Traffic Impacts and Sustainable Travel

Issue/Recommendation	Project response	Appendix
<p>Increased growth will place further pressure on the existing transport networks in and around the precinct. As a result, it is essential that all modes of travel throughout the LGA are catered for. SINSW is therefore supportive of various actions that seek to deliver opportunities for greater active and public transport opportunities and recommends that the proposal consider the following actions to encourage and promote active and sustainable travel:</p>	<p>Gyde <i>Town Plan</i></p> <p>Refer to the attached letter addressing concerns raised by SINSW.</p>	<p>Appendix 31</p>
<p><u>Active Transport</u></p> <p>SINSW notes that there are currently no residents on the northern side of Carrington Road (adjacent to where the development site is located). As a result, it is likely that the majority of the pedestrian demand for this part of the precinct will be generated by the proposal.</p>	<p>Gyde <i>Town Planner</i></p> <p>Refer to the attached letter addressing concerns raised by SINSW.</p>	<p>Appendix 31</p>

<p>Additionally, students are considered vulnerable road users for transport purposes. Students are considered within walking or riding distance of their primary or secondary school if they live within a straight-line distance of 1.6km from the primary school or 1.9km from the secondary school. This is referred to as the 'active travel zone' (ATZ). Outside this zone, students are eligible for the Subsidised School Transport Scheme (SSTS) for free public transport or school bus access to school.</p> <p>Based on the above, SINSW seeks clarification on the active and public transport networks capacity to meet the demand at the site, given the Metro only caters for two directions of travel demand. SINSW expresses concern that students located outside the ATZ (and thus ineligible for the SSTS), will be faced with a formidable journey to both Samuel Gilbert Public and Castle Hill High School. To improve the journey to nearby schools such as Samuel Gilbert, the proposal should include consideration of pedestrian safety measures, as follows:</p> <ul style="list-style-type: none"> • A new pedestrian leg on the western side of the intersection of Gilbert Road / Caterson Drive to prevent students crossing the driveways and intersections on the east side of Gilbert Road. • A school service or new bus route between the development and Samuel Gilbert Public School. 		
<p><u>Intersection Signalisation</u></p> <p>SINSW notes that increased growth will place further pressure on the surrounding intersections. To operate</p>	<p>Gyde Town Planner</p> <p>Refer to the attached letter addressing concerns raised by SINSW.</p>	<p>Appendix 31</p>

<p>safely, the proposal should review the traffic signal operations and remove double phasing before AM and after PM bell times at the following locations:</p> <ul style="list-style-type: none"> • Showground Road intersection with Gilbert Road (for students walking to Samuel Gilbert Public School). • Showground Road / Carrington Road (for students walking to Castle Hill High School). 		
<p><u>Car Park / Loading Dock Design</u></p> <p>The proposal seeks to provide access to the loading dock via Andalusian Way along the eastern frontage of the site. SINSW notes that Drawing DA-110-010 of the Architectural Plans and the Vehicular Servicing and Management Plan details trucks entering / exiting the loading dock in a forward direction. However, further detail is required regarding measures to manage conflicts between trucks entering / exiting the loading dock and pedestrians utilising the Andalusian Way footpath. SINSW recommends that further review is completed and consideration is made for a pedestrian crossing in this area.</p> <p>Further, it appears from the Architectural Plans that the mouths of the Andalusian Way and De Clambe Drive driveways are setback within the building line behind the pedestrian pathway, meaning that vehicles entering and exiting the site will not be immediately apparent to pedestrians using the footpath. Conversely, pedestrians will not be immediately visible to vehicles exiting the site. As a</p>	<p>Gyde Town Planner</p> <p>Refer to the attached letter addressing concerns raised by SINSW.</p>	<p>Appendix 31</p>

result, this could be dangerous to pedestrians surrounding the site. As above, it is recommended that the applicant further considers the interaction between vehicles and pedestrians for these driveways.		
<p>Traffic Assessment</p> <p>SINSW has reviewed the Traffic and Parking Assessment exhibited as part of the SSD package (prepared by Varga Traffic Planning). The Assessment does not adequately detail the cumulative impact of the proposal in the context of surrounding Showground Station Precinct. SINSW requests that this be outlined within the assessment in order to determine how the surrounding road network will operate under this scenario.</p> <p>Furthermore, the report remains silent on the pedestrian travel demand anticipated to stem from the development. SINSW requests that this be clarified within the assessment to determine whether the pedestrian network can accommodate the increased load.</p>	<p>Gyde <i>Town Planner</i></p> <p>Refer to the attached letter addressing concerns raised by SINSW.</p>	<p>Appendix 31</p>

3 Response to Organisations

3.1 QIC

1.1 Inconsistency with the Concept DA SSD-9653		
Issue/Recommendation	Project response	Appendix
<p>The Concept Development Application (DA) SSD-9653, approved on 29 January 2021, grants consent for building envelopes for a 21-storey mixed use development with a maximum 51,065m² GFA for the Doran Drive Plaza Precinct. The conditions of consent included the following:</p> <p><i>C6. The rates of car parking and bicycle parking spaces for future development</i></p>	<p>Hill PDA <i>Urban Economics</i></p> <p>Please refer to the attached response letter addressing concerns raised by QIC.</p>	<p>Appendix 32</p>

applications are to be in accordance with the maximum rates and caps established under the Urban Design Guidelines endorsed pursuant to Condition B1.

As shown in Table 1 below, the proposed 341 retail car parking spaces significantly exceeds the maximum permitted retail car parking of 84-182 spaces based on the endorsed Concept DA approved rate of 1 space per 60m² (maximum) - 130m² (minimum) of GFA for retail uses. The subsequent Section 4.55 (1A) modification application to adjust the car parking rates to enable the provision of a full line supermarket to be economically viable is not supported as this undermines the original intention of the Concept DA. The Concept DA specifically sought to deliver a convenience-based mixed-use centre, with retail facilities focused to:

“Serve localised demand from residents, workers and commuters. The retail floor space will generally focus on convenience goods, everyday comparison goods, food and beverage offerings to complement the proposed Castle Hill Showground master plan food and beverage retail offer, personal services and complementary non-food speciality e.g. pharmacy and newsagent and apparel and supporting non-retail uses e.g. real estate, medical, financial services, travel agent.” (SSD-9653 EIS 2021, pg 100)

Table 1.
Provision of parking spaces
Allowed under Concept DA SSD-9653

- 84-182 spaces
- 1 space per 60m² (max.) –130m² (min.) of retail GFA

Proposed in SSD-15882721

<ul style="list-style-type: none"> ○ 341 spaces ○ 1 space per 32m2 <p>Furthermore, the Concept DA intended to deliver a high-density mixed-use centre with supporting retail, commercial, recreation and community uses integrated within the Hills Showground Station to support the population within the precinct, rather than attract visitors by car from the broader region.</p>		
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1.2 Inconsistency with statutory Design Excellence requirements

Issue/Recommendation	Project response	Appendix
<p>In considering whether the development exhibits design excellence, Clause 9.5(4)(e) of The Hills Local Environmental Plan (LEP) 2019 requires the consent authority to have regard to the requirements of the development control plan (DCP) referred to in Clause 9.4. The DCP must provide for:</p> <p><i>(d) encouraging sustainable transport, including increased use of public transport, walking and cycling, road access and the circulation network and car parking provision, including integrated options to reduce car use,</i></p> <p>Part D, Section 19 (5.11) of The Hills DCP 2012 – Showground Station Precinct requires car parking rates to be determined by a merit-based assessment for retail and commercial uses in the B2 Local Centre zone. DAs are to be accompanied by a traffic and parking study which demonstrates that the parking provision is sufficient to meet the forecast demand. Section 2.8 of the UDG identifies design excellence as the fundamental reason for the production of the UDG. It is therefore considered that the maximum car parking rates in the UDG assist in delivering design excellence across the Showground precinct. Deviating from these controls</p>	<p>Hill PDA Urban Economics</p> <p>Please refer to the attached response letter addressing concerns raised by QIC.</p>	<p>Appendix 32</p>

<p>raises the question as to whether the proposed development would continue to exhibit design excellence in accordance with The Hills LEP 2019.</p> <p>An increase in car parking is not supported as this contradicts the UDG and the principles of design excellence, which both encourage sustainable transport and a reduction in car use. If a full-line supermarket upon the site cannot be supported within the existing car parking parameters prescribed by the UDG, the site is not considered to be suitable for a supermarket of this scale.</p>		
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1.3 Section 4.55(1A) modification does not result in minimal environmental impact

Issue/Recommendation	Project response	Appendix
<p>A Section 4.55 (1A) modification to the Concept DA (SSD-9653-Mod-1) has been lodged which proposes to amend the endorsed Urban Design Guidelines (UDG) as part of the Concept DA, specifically in relation to the car parking rates it establishes for retail and commercial uses in the Doran Drive Precinct. It is proposed to remove these car parking rates and introduce a cap on retail/commercial car parking. While the modification is yet to go on public exhibition, commentary is captured in this submission as the proposed supermarket is intrinsically linked to the lodged modification.</p> <p>The proposed modification seeks to increase the retail car parking spaces permitted by 87%. The increase in maximum retail car parking rates would have adverse implications by encouraging the use of private vehicles and discouraging the use of sustainable transport.</p> <p>The EP&A Act provides that for</p>	<p>Hill PDA Urban Economics</p> <p>Please refer to the attached response letter addressing concerns raised by QIC.</p>	<p>Appendix 32</p>

<p>a modification application to be considered under Section 4.55(1A), the consent authority must be satisfied that the proposed modification is of minimal environmental impact.</p> <p>Given the significance of the proposed increase in retail car parking and the resulting consequences on the local traffic network, this modification will not have a “minimal” environmental impact, and therefore does not constitute a modification pursuant to Section 4.55 (1A) of the Environmental Planning and Assessment Act 1979 (EPA&A).</p>		
1.4 Deviates from intended transit-oriented development		
Issue/Recommendation	Project response	Appendix
<p>The site is situated along the new Sydney Northwest Metro urban corridor and within the Hills Showground Station Precinct and is considered a strategic transit-oriented development (TOD) site expected to support the provision of more housing and jobs within The Hills Shire LGA.</p> <p>This is identified within various government strategies and planning policies including:</p> <ul style="list-style-type: none"> • Greater Sydney Region Plan – A Metropolis of Three Cities (GSC, 2018); • Central City District Plan (GSC, 2018); • North West Rail Link Corridor Strategy (DPIE & TfNSW, 2013); • Hills Future 2036: Local Strategic Planning Statement (The Hills Shire Council, 2019); and • The Hills Corridor Strategy (The Hills Shire Council 2015). <p>Specifically, the Greater Sydney Region Plan – A Metropolis of Three Cities, Central City District Plan and Hills Future 2036: Local</p>	<p>Hill PDA Urban Economics</p> <p>Please refer to the attached response letter addressing concerns raised by QIC.</p>	<p>Appendix 32</p>

Strategic Planning Statement highlight that Sydney Metro Station precincts are to be planned using transport-oriented design principles that provide a mix of land uses to promote walkability and public domain. The priority to encourage sustainable travel modes, improve active transport accessibility and reduce the reliance of private vehicles is a widely recognised objective across all strategic plans. The delivery of the precinct as TOD is identified as a key component to the overall project.

In addition, The Hills Corridor Strategy vision emphasises the role of the Showground Precinct focused on accommodating future residential demand and retail as a secondary objective: "High density residential living with access to employment, limited retail, cultural and recreational opportunities." (Hills Corridor Strategy, pg. 38).

Therefore, the proposed increase in car parking to support the feasibility of a full-line supermarket compromises the role of the Hills Showground Station Precinct as a TOD site. The provision of additional car parking above the nominated parking rate will increase car dependency, inconsistent with the TOD purpose to encourage walking, cycling and public transport use and reducing demand for private car use. Support of the increase in car parking will ultimately limit the potential of the site to achieve TOD principles and best utilise the Sydney Northwest Metro line.

Further, the approved Concept DA EIS states that the total number of parking spaces at the approved parking rate is appropriate for TOD and in line with RMS's traffic generating

development to naturally limit traffic impacts. Therefore, the proposal to increase the number of parking on site does not ultimately demonstrate best practice TOD principles.

Clarity is required whether the additional car parking spaces will be restricted to the patrons of the supermarket, or whether the car parking spaces are also accessible to patrons of other retail/commercial tenancies. Increasing the options for car usage would further comprise the TOD credentials of the precinct. This should be addressed in a revised Supermarket Plan of Management.

QIC acknowledges that the SSD concept approval permits the further densification of the Showground Station Precinct, and it is expected for the site to support the growing residential population, which will additionally increase a need for retail and supportable supermarket space. However, it is considered that a smaller format or convenience style supermarket would be more appropriate with the existing retail already provided. These supermarkets typically comprise a maximum of 1,000m² and have limited onsite parking, consistent with TOD principles and will support the rise of population for the site. These supermarkets trade well in highly patronised train station precincts with high density living in walking distance, in line with the vision of the application. Notwithstanding the above, the proposed delivery of a larger full-line supermarket will ultimately lead to an over reliance on cars within the precinct.

1.5 Impact on Castle Towers landholdings

Issue/Recommendation	Project response	Appendix
The proposed full-line	<i>Hill PDA</i>	Appendix 32

<p>supermarket will likely have a negative impact of detracting existing and future customers from the established Castle Towers Shopping Centre. This will ultimately have a flow on effect to the complementary retail offering and compromises the role of Castle Hill as a planned strategic centre, intended to provide a wide range of goods and services.</p> <p>The clear focus of retail activity in the Castle Hill strategic centre is to ensure efficient and sustainable planning whereby public and private investment in infrastructure, public domain and marketing are more efficiently targeted, transport impacts of retail activity can be planned well in advance and trip generation is minimised as the centre provides a variety of retail, services, entertainment and jobs. Therefore, to maintain Castle Hill as the strategic centre, a more appropriate proposal for the Doran Drive Plaza Precinct would be that of a small format supermarket accommodating the daily needs of local residents.</p>	<p>Urban Economics</p> <p>Please refer to the attached response letter addressing concerns raised by QIC.</p>	
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1.6 Poor land use and urban design outcome

Issue/Recommendation	Project response	Appendix
<p>The proposed full-line supermarket will detract from the overall vision of the Doran Drive Plaza Precinct as a mixed-use vibrant centre as the future full line supermarket will dominate as they key use for the site. Whilst appreciating that an anchor tenant is key to a successful retail centre, to develop a full line supermarket with a significant dominant footprint does not allow a true mixed use of the land. The proposal ultimately goes beyond an appropriate scale of retail for the precinct as a local centre and does not provide for the most efficient use of the site. As a result of this</p>	<p>Hill PDA</p> <p>Urban Economics</p> <p>Please refer to the attached response letter addressing concerns raised by QIC.</p>	<p>Appendix 32</p>

dominant footprint, the proposed design to accommodate a full-line supermarket emphasises a large visual bulk appearance and will give way to a lost opportunity for active frontages along key street elevations to be viewed by pedestrians and shoppers. Blank walls are widely recognised as a poor design solution and are commonly recommended to be avoided in all forms of development. Therefore, the overall lack of an articulated façade presents a poor urban design outcome.		
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1.7 Traffic and transport impacts

Issue/Recommendation	Project response	Appendix
<p>The justification of the additional car parking is principally based on a benchmarking comparison of the rates of supply at other shopping centres. However, the key metric should be car parking demands, to which there is little to no reference in the proposal. The dataset provided includes Castle Towers, where it is presented that the rate of supply is 5 car spaces per 100sqm. However, we note that the rate of demand at Castle Towers is closer to 3.7 car spaces per 100sqm. Furthermore, the appropriateness of comparing a local neighbourhood shopping centre to regional shopping centres like Castle Towers should be questioned.</p> <p>There is no consideration of the appropriateness of the car parking provision, having regard to the travel demand management principles that have clearly informed the parking controls. In our view, if car parking is to be provided above a maximum, the traffic impact assessment should quantify the additional traffic demand and thus impact of the higher car parking provision. In this case, the traffic impact</p>	<p>Hill PDA Urban Economics Please refer to the attached response letter addressing concerns raised by QIC.</p>	<p>Appendix 32</p>

<p>assessment simply assesses the traffic generation with the assumption of no option for a lesser provision. This results in an automatic conclusion that the traffic impacts are acceptable, and therefore oversimplifies the fact that the impact would have been lesser with the reduced parking provision.</p> <p>The traffic generation assessment assumes that the GLFA is equal to 75% of the GFA. This assumption is not necessarily accurate as the GLFA is instead able to be attained from the DA plans. This potentially significantly underestimates the traffic generation of the site.</p> <p>The traffic distribution assumes that 25% of the development generated traffic occurs by vehicles already on the road network; that is, by passing vehicles. Whilst this information is valid, the assessment should include the movements to/from the site to assess the traffic impacts accurately. It appears the traffic assessment has excluded these movements from the network.</p> <p>Finally, the SIDRA analysis in the traffic impact assessment appears to be based on existing data from March and May 2021. This raises concerns as to whether the traffic demands at this time were typical, due to the impacts of COVID-19. The SIDRA analysis should be revised to reflect typical traffic demands more accurately.</p>		
Conclusion		
Issue/Recommendation	Project response	Appendix
<p>The proposed Doran Drive Plaza Precinct SSDA aims to deliver a vibrant commercial and residential precinct that will enhance the Hills Showground Station. Whilst QIC supports the proposed</p>	<p>Gyde <i>Town Planner</i></p> <p>HillPDA have prepared a detailed response to the issues raised in the submission from QIC. In summary, this response prepared by Hill PDA makes the following conclusions:</p>	<p>Appendix 32</p>

<p>development's intention to increase housing and best optimise investment of the Sydney Northwest Metro line, concern is raised about the proposed full-line supermarket and subsequent increase in carparking.</p> <p>QIC welcomes the opportunity to comment on the SSDA and looks forward to further opportunities to engage with and contribute to the future strategic planning process for The Hills Shire and specifically the Castle Hill strategic centre. In summary, our key recommendations in relation to the proposed Doran Drive Plaza Precinct SSDA are as follows:</p> <ul style="list-style-type: none"> • The overall strategic intent of the proposed Doran Drive Precinct SSD as a TOD is supported and will achieve increased housing to achieve housing targets. • QIC supports the proposal's vision for a TOD and the proposed built form to support increase housing in close proximity to Hills Showground station but seeks to ensure that the future determination will limit the future retail offering to deliver a vibrant mixed-use centre as identified across the strategic planning framework and Concept SSDA-9653 approval. • At a maximum, the proposed development should be limited to a small format supermarket with no increase in parking above the approved SSDA-9653 parking rate. This will ensure that the proposed development achieves the intended purpose of a TOD site consistent with strategic plans and will not result in an over reliance of cars within the precinct. This will also assist in the 	<p>The proposed variation to the retail car parking rate established by the concept approval is to ensure the commercial viability of this new local centre in both the short and long term, noting the current population in the walkable catchment is insufficient to support the supermarket.</p> <p>The proposed retail car parking will not undermine the role of this new local centre to provide convenience shopping within the Hills Showground Station Precinct's walkable catchment, noting in the short-term population levels in the walkable catchment are low, and in the long-term it will provide more choice for residents living outside the walkable catchment that are currently travelling further distances to undertake most of their grocery shopping.</p> <p>The Section 4.55(2) Modification Application to modify the approved retail car parking rate will have a positive contribution towards transport sustainability for the reasons identified above.</p> <p>The provision of a full-line supermarket will not compromise the role of the Hills Showground Station Precinct as a transit orientated development (TOD) as it is the metro station and mix of high-density land uses located around the station within a walkable catchment, which will contribute to the success of the precinct as a TOD precinct.</p> <p>The proposed development will not significantly impact on Castle Towers, particularly noting that Castle Towers is already trading 15% above the median level for 'Big Gun' centers.</p> <p>The response prepared by HillPDA supports our view that the provision of a full-line supermarket within the Hills Showground Station Precinct promotes the transit-oriented credentials of the precinct. As noted above, the metro station and the high-density land uses surrounding the precinct are the key features which make the Hills Showground Station Precinct a Transit Oriented Development. The provision of a full-line supermarket in this location maximises the number of people who can do their shopping without having to rely on private vehicle transport.</p> <p>The alternative is to only provide a metro style supermarket which forces residents of the TOD precinct to travel by private vehicle to do shopping which requires a full-line supermarket. While this might be in QIC's interests, it is certainly not in the public interest.</p>	
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delivery of design excellence in accordance with The Hills LEP 2019 which aims to encourage sustainable transport and reduce options for car use.		
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3.2 Shelter NSW

Comments		
Issue/Recommendation	Project response	Appendix
<p>Having reviewed the Environmental Impact Statement for the Doran Drive Precinct at Hills Showground station (the EIS), we posit that this development provides inadequate public benefit due to the limited amount of affordable and social housing proposed. A failure to ensure a large enough supply of affordable rental and social housing may also undermine the goals of this development to provide a diverse and resilient community.</p> <p>Sydney is experiencing a severe affordable housing crisis and a social housing deficit that spans across the entire city. This crisis is widely recognised by the NSW Government and is acknowledged in the state's housing strategy, Housing 2041, which names 'affordability' as one of the four pillars of the NSW housing system, aiming to "provide housing that is affordable and secure". It is for this reason we believe the EIS should consider the social impacts of unaffordable and insecure rental housing in this precinct.</p> <p>We are concerned that the proposed development will only deliver 22 affordable housing units, which, at 5%, is the absolute minimum that is required to be delivered under state policy. This is particularly concerning given its location on government-</p>	<p>Deicorp Projects (Showground) Pty Ltd Applicant</p> <p>Shelter's submission proposes an increase from the contractually agreed and costed figure of 5% to an arbitrary target of 20-25% and 10% social housing. The figure posited by Shelter is not based on any evidence and has not been developed based on identified need in the community. Importantly, this figure is not based on the targets established by The Hills Council in its Housing Strategy 2019 and does not accord with the Actions adopted in The Hills 2036 Local Strategic Planning Statement.</p> <p>The subject site is located in the suburb of Castle Hill which according to the latest available ABS data has 3.89% of all households experiencing rental stress. This is substantially lower than the average of rental households across the Sydney statistical district.</p> <p>Further, the wish-list figures provided by Shelter do not acknowledge the fundamental truism about subsidised housing. That is, the provision of subsidised housing requires a subsidy. The development agreement issued by Landcom and agreed by the landowner has already factored in the delivery of affordable housing at the agreed rate, for the agreed period. The suggestion of providing additional social and affordable housing in perpetuity would require the terms of the agreement with the NSW Government's development arm to be revisited to provide a subsidy sufficient to cover the cost of any additional affordable housing. This is unlikely.</p> <p>Notwithstanding the above, Shelter's proposal of 25% affordable housing and 10% social housing more closely reflects the targets for projects under the NSW Government's Communities Plus program which is delivered on government-owned land through the NSW Land and Housing Corporation (LaHC). Under Communities Plus, LaHC effectively contributes the land for free to the development project in return for the delivery of social and affordable housing at a ratio of about 30-35% of the total project. This arrangement is the delivery model contained in the NSW Government's Future Directions for Social Housing Strategy. The Doran Drive Plaza Precinct project was not owned by LaHC, the project was not run as a Communities Plus program and therefore these targets cannot apply. In fact, the landowner has agreed to purchase the land at market rates to deliver market housing plus 5% affordable housing consistent with the targets contained in by the Greater Sydney Commission's Plan for Sydney as well as for comparable Landcom projects.</p>	

owned land and raises questions about the commitment of the NSW Government and Landcom to deliver more affordable housing. The EIS states that this site is one of the only state-owned development projects in the Central City District. As such, there are few opportunities to deliver subsidised housing options in this region, and the Hills Showground precinct poses a significant opportunity. We also highlight the social impact of displacing affordable housing residents once the 22 dwellings revert to market housing after 10 years, which we are beginning to witness as the National Affordability Rental Scheme comes to an end¹. It is imperative that any new affordable housing remains affordable in order to deliver a meaningful and much-needed increase in the supply of genuine affordable rental dwellings that will contribute to addressing the critical undersupply of affordable rental housing in NSW.

Additionally, we believe social housing should be delivered as part of this project. Whether it be loss of income or a dramatic change in personal circumstances, all communities need a stock of social housing; it is essential, for example, for people to leave domestic violence situations, seniors in the rental market, and those who may have lost income due to COVID-19. According to the Department of Communities and Justice, there are 1833 households waiting for social housing in the GW01 Parramatta/Baulkham Hills zone, which includes Castle Hill. Of these, 94 are considered priority i.e. in urgent need of housing. The minimum wait on social

housing is 5-10 years for a studio/one bedroom unit, and 10+ years for all other dwelling types.

It is in the public interest to delivery affordable and social housing to every community in Sydney. The development must therefore deliver more to be in the public interest and to create a truly diverse and socially resilient community. As such, we propose that the Doran Drive Plaza Precinct development, and any development on government-owned land, should deliver a minimum of 20-25% affordable housing and 10% social housing to deliver meaningful social impact and public benefit. The use of government owned land to increase affordable and social housing is a well-established strategy aimed at addressing housing issues. This strategy is able to reduce the cost of developing subsidised housing, addresses spatial dislocation of low-income households and has the potential to assist governments in meeting targets by significantly scaling up supply.